

Additional Guidance on Payment and Filing Deadlines

In Notice 2020-18, the Treasury Department and the Internal Revenue Service (IRS) announced special Federal income tax return filing and payment relief in response to the ongoing COVID-19 emergency. The IRS has published additional guidance in the form of questions and answers. Some of this guidance relates to employee benefit plans and is summarized below. The complete text of the IRS guidance can be accessed by [clicking on this link](#).

Q&A-17: Contributions can be made to your IRA, for a particular year, at any time during the year or by the due date for filing your return for that year. Because the due date for filing Federal income tax returns has been postponed to July 15, the deadline for making contributions to your IRA for 2019 is also extended to July 15, 2020.

Q&A-20: An employer with an April 15, 2020 due date for filing the employer's tax return (e.g., Form 1120) can take advantage of the grace period for filing tax returns for purposes of making contributions to its workplace-based retirement plan that are treated as made on account of 2019. The end of the grace period under Section 404(a)(6) will end on July 15, 2020 in lieu of April 15.

Q&A-21: Contributions may be made to your health savings account (HSA) or Archer MSA, for a particular year, at any time during the year or by the due date for filing your return for that year. Because the due date for filing Federal income tax returns is now July 15, 2020, under this relief, you may make contributions to your HSA or Archer MSA for 2019 at any time up to July 15, 2020.

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