

AICPA recommendations to state CPA societies

- During the pandemic, state and local jurisdictions should:
- - **Waive interest and penalties and provide broad reasonable cause relief for late payment and late estimated payment and late filing for returns originally due 3/1-7/15 that are filed and paid by 10/15 and other delays and late actions as a result of the pandemic.**
 - Example: [Minnesota](#)
- - **Permit secure electronic fund transfers for payments with no additional fees (instead of paper checks).**
 - Example: [Mississippi](#)
- - **Permit electronic images (scanned or photographed) of signatures (instead of wet signature requirements) for returns (and other documents, including a Power of Attorney).**
 - Examples: 16 states - [AZ](#), [CA](#), [DC](#), [GA](#), [IA](#), [KS](#), [MA](#), [MD](#), [MI](#) ([MI Treas.](#)), [MS](#), [NE](#), [NJ](#), [NY](#) ([esig on efile auth.](#)), [OH](#), [PA](#), [RI](#) ([IRS memo](#), [IRS memo 12/11/20 extend to 6/30/21](#), permanent legislation on e-file authorizations – [NY](#))
- [AICPA Chart on COVID-19 Impact on 2019 State Income Tax Return Signature Requirements](#)
- [Model language for guidance on electronic signatures for state returns](#)
- [Model LEGISLATIVE language on electronic signatures, e-file authorizations, and electronic submissions and attachments for state returns](#)
- - **Provide automatic acceptance into the state electronic filing program if accepted by the IRS and do not require a separate signature authorization form other than the IRS Form 8879 series.**
 - Examples: 12 states do not require a signature form unique to that state when e-filing an individual tax return (Form 1040) - CT, FL, [GA](#), KS, ME, MN, MT, NH, NC, OH, TN, TX, (Kansas City and St. Louis, MO, KY cities, MI cities, MI business tax, some OR cities including Portland, OH cities, PA cities including Philadelphia and Pittsburgh)



AICPA additional recommendations to state CPA societies

- During the pandemic, state and local jurisdictions should:
- - **Permit electronic filing and secure email transmission of documents and returns (including allowing an email of a PDF of a return).**
Example: [Georgia](#), [Maryland](#), [Mississippi](#), [New York](#)
- - **Accept alternatives instead of attachments to paper returns.**
- - **In lieu of complete Schedules K-1, accept a consolidated summary of the partners' share of Schedule K-1 line items, Schedules K-1 on an external digital storage media device, or Schedules K-1 securely e-mailed to a person at the Department.**
- - **Regarding federal return attachments, accept a state return without the federal return attached, or allow the taxpayer to attach a single statement to state returns that states "federal return and Schedules K-1 available upon request," or allow federal returns and Schedules K-1 to be submitted on an external digital storage media device or securely emailed to someone at the Department.**
- - **Suspend any requirement to send items and returns via certified mail.**
Example: [Mississippi](#)
- - **Extend the time to file a refund claim for a previous tax year with a statute of limitation that expires from 3/1/20 until 90 days after the end of the Governor's declared state of emergency in the state.**
- Example: [California](#), [Georgia](#), [Kentucky](#), [New Jersey](#), [Oregon](#)



States Allowing Electronic Signatures During the Pandemic



- 16 States allow e-signatures in pandemic ([AZ](#), [CA](#), [DC](#), [GA](#)[^], [IA](#), [KS](#)[^], [MA](#), [MD](#)[^], [MI](#) (MI Treas.), [MS](#)[^], [NE](#), [NJ](#), [NY](#)[^] (esig on efile auth.), [OH](#)^{*}, [PA](#), and [RI](#))
- 11 states do not require a signature form unique to that state when e-filing an individual tax return (Form 1040) - CT, FL, [GA](#), KS, ME, MN, MT, NH, NC, OH^{*}, TN, TX, (Kansas City and St. Louis, MO, KY cities, MI cities, MI business tax, some OR cities including Portland, OH cities, PA cities including Philadelphia and Pittsburg)

● [^] 4 States also permit electronic filing and secure email transmission of documents and returns (including allowing an email of a PDF of a return) ([Georgia](#), [Maryland](#), [Mississippi](#), [New York](#)) (in addition to also being a state that allows e-signatures in pandemic)

