

## Transition to SURI: Phase 3

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### PRACTICE AREAS

- Tax

### An McV Tax Alert

February 7, 2020

On January 31, 2020, the Puerto Rico Treasury Department (“PR Treasury”) issued various publications regarding the transition of certain transactions currently conducted through its current digital platforms (“Current Platforms”) to its web-based tool, the Internal Revenue Unified System, also known as “SURI” (for its Spanish acronym).

The following summarizes PR Treasury’s guidance on the reports, payments, applications or transactions that must be submitted/processed through SURI beginning **February 24th, 2020**.

### **Internal Revenue Informative Bulletin No. 20-01 of January 31, 2020 (“IB 20-01”)**

Per IB 20-01, the following transactions must be undertaken in SURI:

1. Individuals, Corporations, Pass-through and Other Entities, as applicable:
  - Filing and amendment of:
    - Individual Income Tax Return (Form 482.0) and Corporate Income Tax Return (Form 480.20) for 2018 and subsequent taxable years.
  - Filing of:
    - Informative Income Tax Return Pass-Through Entity (Form 480.20(EC));
    - Informative Return - Pass-Through Entity (Form 480.6 EC), Revocable Trust or Grantor Trust Informative Return (Form 480.60 F), and Informative Return Employees Owned Special Corporation (Form 480.60 CPT) - Will be filed in the “Pass-Through Entities” SURI account for taxable year 2019 and subsequent taxable years, instead of the “Other Income Withholding” SURI account used for taxable year 2018; and
    - Request for Extension of Time to File the Income Tax Return, Form AS 2644 (“Extension Request”) for 2019 and subsequent taxable years, for all taxpayers.
  - Payment of:

- Estimated Income Tax Installments; and
  - Income Tax liability with the return (including payment in two installments for eligible individuals).
  - Application and automatic approval of payment plans under \$50,000.
  - Submission of evidence required with the return of individuals or corporations for 2018 and subsequent taxable years.
  - Individuals tax refund status for 2019 and subsequent taxable years.
2. 4% Excise Tax under Act 154-2010:
- Filing of Quarterly Excise Tax Return pursuant to Act No. 154 of October 25, 2010 (Form 480.36-Q); and
  - Remittance of Monthly Excise Tax pursuant to Act No. 154 of October 25, 2010 (Form 480.36).
3. Related Entities:
- Registration and management of group of related entities; and
  - Filing of Apportionment of the Deduction for the Surtax Computation – Group of Related Corporations (Form AS 2652.1).
4. Returns Specialists:
- Filing of Application to Register as a Returns, Declarations or Refund Claims Specialist (Form AS 2887) and registration-fee payment;
  - Renewal of Specialist’s Registration Number and renewal-fee payment; and
  - Management of persons authorized to use the Specialist’s Registration Number.
5. Public Notaries - Filing of Informative Return on Segregation, Merger or Transfer of Real Estate (Form SC 2821).
6. Tax Exemption
- Filing of:
    - Application for Tax Exemption under Section 1101.01 of the Puerto Rico Internal Revenue Code of 2011, as amended (Form AS 2645.1) for not-for-profit entities;
    - Application for Tax Exemption Applicable to Credit Unions under Section 1101.01 of the Puerto Rico Internal Revenue Code of 2011, as amended (Form SC 2647); and
    - Application for Tax Exemption under Act No. 168 of June 30, 1968, as amended (Form SC 4202) applicable to hospital units.

- Access to Tax Exemption Certificate of Effectiveness for Not-for-profit Entities after tax exemption has been granted by PR Treasury.
  - Submission of evidence required with the above applications for 2018 and subsequent taxable years.
  - Payment of the applicable service charges for the above.
7. Environmental Protection Deposit - Filing, amendment and payment of the Tri-Annual Return of the Environmental Protection Deposit (Form SC 2222).

PR Treasury will provide further guidance on the launching of SURI's Phase 3, including the registration procedure for the above transactions. To access IB 20-01, please **follow this link**.

**Internal Revenue Informative Bulletin Nos. 20-02 and 20-03 of January 31, 2020 (“IB 20-02 and IB 20-03, respectively”)**

In IB 20-02, PR Treasury notifies that from February 12 to February 24, 2020 (“Transition Period”) it will be transferring the information from several of its Current Platforms to SURI in preparation for the launching of SURI's Phase 3. During the Transition Period, PR Treasury will be accepting payments only for stamps, certain withholding and payment receipts, traffic fines and vehicle's registration tags, and the Current Platforms will be available as follows:

**Service through:**

**Transactions related to:**

**Available until:**

**Note:**

*Colecturía Virtual*

Payment, filing of returns, request for extension or any other transaction related to income taxes.

11:59pm of February 11, 2020.

On February 12, 2020, this platform will no longer be available for these transactions.

### *Colecturía Virtual*

Negative debt and filing certification requests.

11:59pm of February 14, 2020.

On February 15, 2020, this platform will no longer be available for these transactions.

### *PR Treasury's Collection Offices*

Payment, filing of returns, request for extension or any other transaction related to income taxes.

February 11, 2020 at regular business hours.

From February 12 to February 24, 2020, *PR Treasury's Collection Offices* will be accepting payments only for stamps, certain withholding and payment receipts, traffic fines and vehicle's registration tags.

### *Sistema de Registro de Grupos de Corporaciones Relacionadas*

Controlled group registration and filing or amendment of Form AS 2652.1.

11:59pm of February 13, 2020.

On February 14, 2020, this platform will no longer be available for these transactions.

### *Sistema Ley 154*

Monthly deposit, filing a return or any other transaction related to Act 154-2010.

11:59pm of February 13, 2020.

On February 14, 2020, this platform will no longer be available for these transactions.

### *Notarios – Sistemas de radicación de planilla informativa sobre bienes inmuebles*

Filing of Informative Return on Segregation, Merger or Transfer of Real Estate.

11:59pm of February 13, 2020.

On February 14, 2020, this platform will no longer be available for these transactions.

SURI

Any transaction related to sales and use tax, income tax withholding, estate, gifts, excise and alcoholic beverages taxes and licenses fees.

5:00pm of February 20, 2020.

Available again on February 24, 2020 at 8:00am.

Considering that the Current Platforms will not be available as indicated above, PR Treasury will postpone the following due dates:

### **Matter**

#### **Original Due Date**

#### **Extended Due Date**

- Sales and use tax
- Income tax withholding
- Estate and gift taxes
- Excise and alcoholic beverages taxes and licenses fees.

Any return, form, declaration, payment or any other transactions related to these taxes, due between February 20 and February 24, 2020.

Tuesday, March 3, 2020

Informative Returns

Any Informative Return (Forms 480.5, 480.6A, 480.6B, 480.6B.1, 480.6D, 480.6G, 480.6SP, 480.6SP.2, 480.7, 480.7B, 480.7B.1, 480.7C, 480.7C.1 and 480.7E) due February 28, 2020.

Tuesday, March 3, 2020

### Income Tax

Any return, form, declaration, payment or any other income tax transactions due between February 12 and February 24, 2020.

Monday, March 16, 2020

You can access IB 20-02 **in this link**.

In IB 20-03, PR Treasury informs that the only payment methods available in SURI will be (1) Visa or Master Card credit card; (2) ACH Debit; and (3) ACH Credit. For more information on the requirements for ACH Credit payments, you can access Publication 06-06 through **this link**.

To access PR Treasury's IB 20-03, please **follow this link**.

We suggest safekeeping any evidence or making back-up copies of reports, returns, payments, filings and other transactions undertaken through any of the Current Platforms that will no longer be in use in case the information is lost during the Transition Period.

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