

## Coronavirus Task Force

The COVID-19 pandemic is creating significant business and legal challenges for companies throughout the world. In response to client demand, Miller & Chevalier Chartered has formed an interdisciplinary task force, comprised of attorneys in seven main practice areas, to help businesses navigate the complex legal issues created by this global event. The Miller & Chevalier Coronavirus Task Force advises clients in a wide range of industries regarding legislative, regulatory, and strategic implications of the COVID-19 outbreak, including:

- **Employee Benefits & Employment:** Implementation of Coronavirus Aid, Relief, and Economic Security (CARES) Act provisions in tax-qualified retirement and health plans; application of Employee Benefits Security Administration (EBSA) Notice 2020-01 and the Internal Revenue Service (IRS)/Department of Labor (DOL) Joint Notice extending Consolidated Omnibus Budget Reconciliation Act (COBRA) insurance, special enrollment, and claims deadlines; obligations under federal leave laws (FMLA) or company leave and paid time off policies; application of the Employee Retention Credit and the Paid Sick Leave/Paid Family Leave Credit; Paycheck Protection Program (PPP) procedures and the impact of PPP loans on employer credits; employer disaster relief payments to employees under Internal Revenue Code section 139; federal and state tax issues from remote work arrangements; disaster relief provisions applicable to deferred compensation arrangements; and duties owed by employers under the Occupational Safety and Health Administration (OSHA) updated coronavirus guidance, including reporting and recording standards and the General Duty Clause.
- **Domestic & International Tax:** Tax issues relating to supply chain and other business disruptions, including the treatment of losses and the permanent negative international tax consequences, which may be particularly dramatic given recent changes made by the Tax Cuts and Jobs Act; potential for legislative business tax relief (*e.g.*, enhanced net operating loss relief, enhanced charitable contribution incentives) modeled after "disaster relief" packages that are commonly enacted in response to natural disasters; tax filing and compliance issues.
- **Government Contracts:** Reimbursement under Section 3610 of the CARES Act; schedule delays, suspensions of work or stop work orders, changes, terminations for convenience, increased costs and other performance issues impacting prime contractors and subcontractors; negotiating contractual and statutory indemnity for the performance of high-risk work; use of rapid acquisition techniques for COVID-19 response supplies and services.
- **Customs & Import Trade:** Planning for supply chain disruption; evaluating alternative suppliers and logistics providers; outreach to customs administrations; application and enforceability of *force majeure* clauses in international trade contracts.
- **Economic Sanctions & Export Controls :** Humanitarian and medical assistance to sanctioned countries and parties; evaluating alternative suppliers, vendors, and partners in response to supply chain disruptions; liaising with government agencies to secure guidance, licenses, and other authorizations; impact and enforceability of trade-related contract obligations, including *force majeure* and other grounds for rescission.
- **Commercial Disputes:** Business disputes arising from supply chain disruption, event, and travel cancellations, and policy/regulatory changes; invocation of *force majeure*, reformation principles and other contractual issues stemming from the spread of COVID-19.
- **Cross-Border Investigations and Corporate Due Diligence:** Managing remote internal investigation and government-led interviews; navigating information collection, including from decentralized systems around the world; conducting due diligence, including in and due diligence required for ongoing mergers, acquisitions, joint ventures, or relationships with third parties.
- **Corporate Compliance Programs:** Enhancing and tailoring compliance programs to identify and meet the needs of a changing workplace, workforce, product, supply chain, counterparty landscape, and other pandemic-related shifts.

- **Paycheck Protection Program** : Applying for PPP loans, monitoring use of eligible expenses, applying for loan forgiveness, preparing for and responding to Small Business Administration (SBA) loan audits, and responding to government investigations and False Claims Act suits.
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## Resource Library: Active and Enacted Legislative Responses to COVID-19

*Jump to a topic:*

[Senate and House Reconciliation Bills](#) | [President Biden's American Rescue Plan](#) | [House Ways and Means Committee Budget Reconciliation Recommendations](#) | [Consolidated Appropriations Act](#) | [Bipartisan Senate/House Problem Solvers Caucus Virus Relief Proposals](#) | [Delivering Immediate Relief to America's Families, Schools, and Small Businesses Act](#) | [HEROES Act](#) | [HEALS Act](#) | [CARES Act](#) | [CARES Act Precursor Materials](#) | [FFCRA](#) | [Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020](#) | [Take Responsibility for Workers and Families Act](#)

### Senate and House Reconciliation Bills (the American Rescue Plan Act of 2021, H.R. 1319)

- [Legislative text of the Senate-passed reconciliation bill \(H.R. 1319\)](#) - tax provisions start on page 342
- [Title-by-title summary of the Senate bill](#)
- [Summary of the Senate modifications to the bill](#)
- [Joint Committee on Taxation Report: Estimated Revenue Effects of H.R. 1319, as approved by the Senate](#)
- [Legislative text of the American Rescue Plan Act of 2021 \(H.R. 1319\)](#) as passed by the House on February 27, 2021
- [Legislative text of the American Rescue Plan Act](#) (for House Budget Committee markup on February 22, 2021)
- [House Budget Committee Report \(H. Rept. 177-7\)](#)
- [Congressional Budget Office cost estimate for the American Rescue Plan Act](#)
- [Joint Committee on Taxation Report: Estimated Revenue Effects of H.R. 1319, The "American Rescue Plan Act Of 2021," Scheduled For Consideration by the House of Representatives on February 26, 2021](#)
- [Joint Committee on Taxation Report: Technical Explanation of the Modification of Exceptions of Reporting Third Party Network Transactions](#)
- [Congressional Research Service: The American Rescue Plan Act of 2021 \(H.R. 1319\) Title IX Subtitle G—Tax Provisions Related to Promoting Economic Security](#)

[President Biden's American Rescue Plan](#)

- [COVID-19 Relief Package fact sheet](#)

### House Ways and Means Committee Budget Reconciliation Recommendations (February 2021)

- [Joint Committee on Taxation Report: Estimated Budgetary Effects of the Revenue Provisions of the Budget Reconciliation Legislative Recommendations, Scheduled for Markup by the House Committee on Ways And Means on February 10, 2021](#)
- [Subtitle A. Budget Reconciliation Legislative Recommendations Relating to Crisis Support for Unemployed Workers](#)
  - [Summary](#)
  - [Legislative Text](#)

- Subtitle B. Budget Reconciliation Legislative Recommendations Relating to Emergency Assistance to Families Through Home Visiting Programs
  - [Summary](#)
  - [Legislative Text](#)
- Subtitle C. Budget Reconciliation Legislative Recommendations Relating to Emergency Assistance for Children and Families
  - [Summary](#)
  - [Legislative Text](#)
- Subtitle D: Budget Reconciliation Legislative Recommendations Relating to Elder Justice and Support Guarantee
  - [Summary](#)
  - [Legislative Text](#)
- Subtitle E. Budget Reconciliation Legislative Recommendations Relating to Support to Skilled Nursing Facilities in Response to COVID-19
  - [Summary](#)
  - [Legislative Text](#)
- Subtitle F. Budget Reconciliation Legislative Recommendations Relating to Continuation of Job-Based Coverage
  - [Summary](#)
  - [Legislative Text](#)
  - Joint Committee on Taxation Report: [Description of the Budget Reconciliation Legislative Recommendations Relating to Continuation of Job-Based Coverage](#)
- Subtitle G. Budget Reconciliation Legislative Recommendations Relating to Promoting Economic Security
  - [Summary](#)
  - [Legislative Text](#)
  - Joint Committee on Taxation Report: [Description of the Budget Reconciliation Legislative Recommendations Relating to Prompting Economic Security](#)
  - CRS Report: [Tax Provisions for COVID-19 Relief: Subtitle G—Budget Reconciliation Legislative Recommendations Relating to Promoting Economic Security](#)
- Subtitle H. Budget Reconciliation Legislative Recommendations Relating to Pensions
  - [Summary](#)
  - [Legislative Text](#)
  - Joint Committee on Taxation Report: [Description of the Budget Reconciliation Legislative Recommendations Relating to Pensions](#)
- Subtitle I. Budget Reconciliation Legislative Recommendations Relating to Child Care for Workers
  - [Summary](#)

- Legislative Text

## **Consolidated Appropriations Act, 2021 (H.R. 133), as passed by the House and Senate on December 21, 2020**

- Legislative text of the Consolidated Appropriations Act, 2021
- Division-by-division summary of authorizing matters
- House Ways and Means Committee section-by-section summary of tax provisions
- Joint Committee on Taxation revenue estimate
- Congressional Budget Office for Divisions A through L of H.R. 133
- House Ways and Means Committee (Republican) reforming the tax extender process
- House Ways and Means Committee (Republican) provisions in the 2020 year-end legislation
- Congressional Research Service Report: Employee Retention and Employee Retention and Rehiring Tax Credits

## **Bipartisan Senate/House Problem Solvers Caucus Virus Relief Proposals**

- Legislative text of the Emergency Coronavirus Relief Act
- Section-by-section summary of the Emergency Coronavirus Relief Act
- Legislative text of the Bipartisan State and Local Support and Small Business Protection Act
- Section-by-section summary of the Bipartisan State and Local Support and Small Business Protection Act

## **Delivering Immediate Relief to America's Families, Schools, and Small Businesses Act**

- Draft relief package proposed by Senate Majority Leader Mitch McConnell (R-KY) for potential floor consideration

## **Health and Economic Recovery Omnibus Emergency Solutions (HEROES) Act (Revised - H.R. 925, passed October 1, 2020; original - H.R. 6800, passed May 15, 2020)**

- Legislative text of H.R. 925 (as passed by the House on October 1, 2020)
- Section-by-section summary of H.R. 925
- Joint Committee on Taxation estimate of the revenue provisions the HEROES Act (as passed by the House October 1, 2020)
- Congressional Research Service Report: Revenue Provisions of the revised HEROES Act
- Legislative text of H.R. 6800 (as introduced on May 12, 2020)
- Summary of H.R. 6800 as introduced
- House Ways and Means Committee press release
- Joint Committee on Taxation (JCT) estimate of the revenue provisions of the HEROES Act
- Congressional Research Service Report: HEROES Act: Division B—Revenue Provisions

- Congressional Research Service Report: [COVID-19: Summary of the Direct Payments Proposed in the HEROES Act](#)
- Congressional Research Service Report: [How Would the HEROES Act Modify the Direct Payments Enacted in the CARES Act?](#)
- Congressional Research Service Report: [Selected Federal Reserve Provisions](#)
- Congressional Budget Office (CBO) cost estimate of the HEROES Act as passed by the House

## **Health, Economic Assistance, Liability Protection and Schools (HEALS) Act**

*The HEALS Act comprises eight separately proposed bills.*

- American Workers, Families, and Employers Assistance Act (S. 4318)
  - Sponsor: Sen. Charles Grassley (R-IA)
  - [Legislative text](#)
  - [Section-by-section summary](#)
- Supporting America's Restaurant Workers Act (S. 4319)
  - Sponsor: Sen. Tim Scott (R-SC)
  - [Legislative text](#)
- Restoring Critical Supply Chains and Intellectual Property Act (S. 4324)
  - Sponsor: Sen. Lindsay Graham (R-SC)
  - [Legislative text](#)
  - [Section-by-section summary](#)
- Continuing Small Business Recovery and Paycheck Protection Program Act (S. 4321)
  - Sponsor: Sen. Marco Rubio (R-FL)
  - [Legislative text](#)
  - [Section-by-section summary](#)
  - [One-page summary](#)
- Safely Back to School and Back to Work Act (S. 4322)
  - Sponsor: Sen. Lamar Alexander (R-TN)
  - [Legislative text](#)
  - [Section-by-section summary](#)
  - [One-pager: student loan provisions](#)
  - [One-pager: school choice provisions](#)
  - [One-pager: child care provisions](#)

- [Safeguarding America's Frontline Employees To Offer Work Opportunities Required to Kickstart the Economy Act \(SAFE TO WORK\) Act \(S. 4317\)](#)
  - [Sponsor: Sen. John Cornyn \(R-TX\)](#)
  - [Legislative text](#)
  - [Section-by-section summary](#)
- [Coronavirus Response Additional Supplemental Appropriations Act, 2020 \(S. 4320\)](#)
  - [Sponsor: Sen. Richard Shelby \(R-AL\)](#)
  - [Legislative text](#)
  - [Summary](#)
- [Time to Rescue United States Trusts \(TRUST\) Act of 2020 \(S. 4323\)](#)
  - [Sponsor: Sen. Mitt Romney \(R-UT\)](#)
  - [Legislative text](#)
  - [One-page summary](#)
  - [Section-by-section summary](#)

## **Coronavirus Aid, Relief, and Economic Security (CARES) Act (H.R. 748, P.L. 116-136)**

- [Legislative text of H.R. 748 \(as approved by the House and Senate\)](#)
- [Senate Finance Committee summary of the bill's tax and unemployment provisions](#)
- [Senate Finance Committee summary of the bill's health provisions](#)
- [Senate Health, Education, Labor and Pensions \(HELP\) Committee summary of the provisions within its jurisdiction](#)
- [Senate Banking Committee Section-by-Section Summary](#)
- [Senate Banking Committee Summary of Lending Provisions](#)
- [Senate Small Business Committee Section-by-Section Summary of CARES Act Title 1 - Keeping American Workers Paid and Employed Act](#)
- [Senate Appropriations Committee summary of the bill's emergency spending provisions](#)
- [House Republican Ways and Means Committee summary of key tax and health provisions](#)
- [JCT revenue estimate for CARES Act](#)
- [JCT description of the tax provisions of the CARES Act](#)
- [Congressional Research Service Report: The CARES Act - Tax Relief for Individuals and Businesses](#)
- [President's signing statement on H.R. 748 on March 27, 2020](#)
- [Senate Finance Committee FAQs on employee retention credit](#)

- [Congressional Research Service Report: The Employee Retention Tax Credit](#)
- [Senate Finance Committee CARES Act Retirement Provisions FAQs](#)
- [Congressional Research Service Report: Retirement and Pension Provisions in the CARES Act](#)
- [Congressional Research Service Report: Interaction of International Tax Provisions with Business Provisions in the CARES Act](#)
- [Congressional Research Service Report: Tax Treatment of Net Operating Losses \(NOLs\) in the CARES Act](#)
- [Congressional Research Service Report: Limits on Business Interest Deductions Under the CARES Act](#)
- [CARES Act section-by-section summary](#)
- [CBO preliminary estimate of the effects of H.R. 748](#)
- [CBO Report: Budgetary Effects of Laws Enacted in Response to the 2020 Coronavirus Pandemic, March and April 2020](#)
- [Congressional Research Service Report: Charitable Contribution Deductions](#)

#### **Precursor Materials for the Coronavirus Aid, Relief, and Economic Security (CARES) Act (introduced as S. 3548)**

- [Legislative text of S. 3548, the "Coronavirus Aid, Relief, and Economic Security Act" \(CARES Act\) as introduced on March 19, 2020](#)
- [Senate Finance Committee summary of the individual and business tax provisions of the CARES Act](#)
- [Senate Finance Committee summary of the health-related tax provisions in the CARES Act](#)
- [Senate Health, Education, Labor, and Pensions \(HELP\) Committee summary of health provisions in the CARES Act within its jurisdiction](#)
- [Senate Commerce Committee summary of the bill's provisions affecting airlines and other distressed industries](#)
- [Treasury Department's initial "Stage Three Proposal" to Senate Republicans on March 17, 2020](#)

#### **Families First Coronavirus Response Act (H.R. 6201, Public Law 116-127) (FFCRA)**

- [Bill text as signed into law](#)
- [JCT technical explanation of Division G, "Tax Credits For Paid Sick And Paid Family And Medical Leave," of the FFCRA](#)
- [JCT estimated revenue effects of the revenue provisions contained in Division G of the FFCRA](#)
- [CBO preliminary estimate of the effects of the FFCRA](#)
- [House Education and Labor Committee Republican summary](#)
- [DOL Webinar Slides on the FFCRA](#)

#### **Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020 (H.R. 6074, Public Law No: 116-123)**

- [Text as enacted into law](#)
- [House Appropriations Committee summary](#)



- [Congressional Budget Office Cost estimate of H.R. 6074](#)
- [Congressional Research Service Report: Coronavirus Preparedness and Response Supplemental Appropriations Act, 2020 \(P.L. 116-123\): First Coronavirus Supplemental](#)

## **House Democratic Leadership Proposed Legislation: Take Responsibility for Workers and Families Act (H.R. 6379)**

- [Text of the draft bill released March 23, 2020](#)
- [Summary](#)
- [FAQs: Economic Assistance Payments](#)
- [FAQs: Unemployment Compensation Provisions](#)

## **Resource Library: Coronavirus Regulatory Guidance**

*Jump to a topic:*

[Advance Pricing Agreements](#) | [Business Interest Expense Deduction](#) | [Deferral of Employment Tax](#) | [Delayed Filing Deadline](#) | [Employee Plan Guidance](#) | [Employee Retention Tax Credit](#) | [Federal and State Executive Responses](#) | [High Deductible Health Plans](#) | [Information for Nonresident Aliens and Foreign Businesses Impacted by COVID-19](#) | [Travel Disruptions](#) | [IRS Enforcement and Compliance](#) | [Net Operating Losses](#) | [New Markets Tax Credit](#) | [Opportunity Zones](#) | [Paid Leave](#) | [Payroll Tax Deferral](#) | [REITs and RICs](#) | [Renewable Energy](#) | [Tax-Exempt Bonds](#)

### **IRS Coronavirus Tax Guidance**

- [www.irs.gov/coronavirus](http://www.irs.gov/coronavirus)

### **Advance Pricing Agreements**

- [IRS announcement on electronic filing under its Advance Pricing Agreement program](#)

### **Business Interest Expense Deduction**

- [IRS Revenue Procedure 2020-22](#) providing guidance regarding the business interest expense deduction under section 163(j)

### **Deferral of Employment Tax**

- [IRS FAQs](#) on the deferral of employment tax deposits and payments through 2020

### **Delayed Filing Deadline**

- [IRS Notice 2020-18](#): Relief for Taxpayers Affected by Ongoing Coronavirus Disease 2019 Pandemic
- [IRS Notice 2020-23](#): Update to Notice 2020-18, Additional Relief for Taxpayers Affected by Ongoing Coronavirus Disease 2019 Pandemic
- [IRS filing and payment deadlines Q&As](#)
- [IRS Notice 2020-17](#): Relief for Taxpayers Affected by Ongoing Coronavirus Disease 2019 Pandemic (*Note: this Notice is superseded by Notice 2020-18*)
- [IR-2020-58, Tax Day now July 15](#): Treasury, IRS extend filing deadline and federal tax payments regardless of amount

- [Updated Statement: Filing and Payment Deadline Extended to July 15, 2020](#)
- [IRS grants extension of time to file FATCA information returns](#)
- [IRS grants extension of time to file Form 8966, FATCA Report, for Reporting Model 2 financial institutions and participating foreign financial institutions](#)
- [IRS FATCA FAQ Number 21](#) extending the FATCA certification deadline from July 1, 2020 to December 15, 2020
- [IRS Notice 2020-20: Gift and Generation-Skipping Transfer Tax Filing and Payment Deadline Relief](#)
- [IRS FAQs](#) on COVID-19 relief for estate and gift tax
- [IRS FAQs](#) on Estate Tax Form 706
- [IRS extends deadlines for 403\(b\) Plans and Pre-Approved Defined Benefit Plans](#)
- [Treasury delays tax and reporting due dates for alcohol, tobacco, firearms, and ammunition businesses hit by COVID-19](#)
- [Alcohol and Tobacco Tax and Trade Bureau \(TTB\) Industry Circular 2020-2 : Tax Payment and Other Filing Due Dates Postponed for Industry Members Affected by COVID-19](#)
- [IRS Installment Agreement Direct Debit FAQs](#)
- [IRS Revenue Procedure 2020-23: Allowing Eligible Partnerships to File Amended Returns for 2018 and 2019](#)
- [IRS Notice 2020-58](#) providing temporary relief from certain rehabilitation tax credit compliance requirements
- [IRS announcement](#) delaying the tax filing deadline to May 17, 2021
- [IRS Notice 2021-21: Relief for 1040 Filers Affected by Ongoing Coronavirus Disease 2019 Pandemic](#)

## **Employee Plan Guidance**

- [IRS/EBSA rule](#) extending certain timeframes for employee benefit plans, participants, and beneficiaries affected by the COVID-19 outbreak
- [EBSA Disaster Relief Notice 2020-01](#) providing guidance and relief for employee benefit plans due to the COVID-19 outbreak
- [EBSA FAQs](#) on health and retirement benefit issues for plan participants and beneficiaries, plan sponsors, and employers impacted by the COVID-19 outbreak
- [IRS retirement plans and IRAs questions and answers](#) on coronavirus-related provisions
- [IRS Notice 2020-29](#) extending the claims period for health FSAs and dependent care assistance programs and allowing taxpayers to make mid-year changes
- [IRS Notice 2020-42](#) providing temporary relief from the physical presence requirement for spousal consents under qualified retirement plans
- [IRS Notice 2020-46](#) providing guidance on the tax treatment of cash payments made by employers under leave-based donation programs to aid victims
- [IRS FAQs](#) on leave-sharing plans

- Congressional Research Service Report: [Coronavirus Impacts on HSAs and FSAs](#)
- [IRS Notice 2020-50](#) providing guidance for distributions and loans from retirement plans under the CARES Act
- [IRS Notice 2020-51](#) providing guidance on waiver of 2020 required minimum distributions
- [IRS Notice 2020-52](#): COVID-19 relief and other guidance on mid-year reductions or suspensions of contributions to safe harbor 401(k) and 401(m) plans
- [PBGC CARES Act Q&As](#) on missed contribution reporting requirements and premium filings for single-employer plans
- [IRS Notice 2020-61](#) providing guidance on funding and benefit limitation rules for single-employer defined benefit plans under the CARES Act
- [IRS announcement](#) allowing cash balance/hybrid plan determination letter requests to supplement applications
- [IRS Notice 2020-82](#) extending the due date for contributions to defined benefit plans to January 4, 2021
- [PBGC Technical Update 20-2](#) extending due date for inclusion of prior year contributions

## **Employee Retention Tax Credit**

- [IRS FAQs](#): Employee Retention Credit under the CARES Act
- [Treasury press release](#) on the launch of the Employee Retention Tax Credit

## **Federal and State Executive Responses**

- [Library of Congress report](#) on federal and state executive responses to COVID-19

## **High Deductible Health Plans**

- [IR-2020-54](#): IRS: High-deductible health plans can cover coronavirus costs
- [IRS Notice 2020-15](#): High deductible health plans and expenses related to COVID-19

## **Information for Nonresident Aliens and Foreign Businesses Impacted by COVID-19 Travel Disruptions**

- [IRS Revenue Procedure 2020-20](#) for eligible individuals to claim a COVID-19 medical condition travel exception
- [IRS Revenue Procedure 2020-27](#), waiver for individuals who reasonably expected to meet the eligibility requirements of section 911(d)(1) during 2019 or 2020, but failed to do so because the individual departed a foreign country on or after a specified date
- [IRS Revenue Procedure 2020-30](#) providing that certain activities are not taken into account for purposes of Form 8858 as a result of travel restrictions
- [IRS FAQs](#)

## **IRS Enforcement and Compliance**

- [IRS announcement](#) postponing certain payments related to Installment Agreements and Offers in Compromise and limiting certain enforcement actions

- [IRS announcement](#) on its internal operations and administrative priorities during the coronavirus crisis
- [IRS Revenue Procedure 2020-29](#) allowing taxpayers to electronically submit requests for private letter rulings and other legal advice.
- [IRS memorandum](#) on accepting images of signatures and digital signatures and approval to receive and transmit documents by email
- [Guidance](#) on payroll support to aid airline industry employees and on loans to airline industry
  - [Guidelines and application procedures](#) for payroll support to air carriers and contractors under Division A, Title IV, Subtitle B of the CARES Act
  - [Procedures and minimum requirements](#) for loans to air carriers and eligible businesses and national security businesses under Division A, Title IV, Subtitle A of the CARES Act
- [IRS Announcement 2020-4](#): Announcement that IRS will conduct all public hearings on guidance by telephone
- [Large Business and International \(LB&I\) Division memorandum](#) on Information Document Request Enforcement
- [IRS Memo](#): Revised LB&I Compliance Priorities During the COVID-19 Pandemic and Approval for Deviation from IDR Process and Enforcement
- [Tax Exempt and Government Entities \(TE/GE\) Division memorandum](#) on Information Document Request Enforcement
- [FAQs issued by IRS, DOL, and HHS](#) for group health plans and health insurance issuers regarding FFCRA and CARES Act implementation
- [IRS temporary and proposed regulations](#) on recapturing excess employment tax credits under the CARES Act and FFCRA

## **Low-Income Housing Credit**

- [IRS Notice 2020-53](#) providing temporary relief from certain requirements under section 42

## **Net Operating Losses (NOLs)**

- [IRS Revenue Procedure 2020-24](#) providing guidance under section 172(b)(1) and section 172(b)(3)
- [IRS Notice 2020-26](#) extending the deadline for filing an application for a tentative carryback adjustment under section 6411
- [IRS FAQs](#) on temporary procedures to fax certain Forms 1139 and 1045 due to COVID-19
- [IRS FAQs](#) on NOLs for taxpayers with section 965 inclusions
- [IRS FAQs](#) on carryback of NOLs by certain exempt organizations
- [Temporary regulations](#) on carrybacks of consolidated NOLs under section 2303 of the CARES Act
- [Proposed regulations](#) on consolidated NOLs under the CARES Act

## **New Markets Tax Credit**

- [IRS Notice 2020-49](#) providing relief for New Markets Tax Credit investments

## **Opportunity Zones**

- [IRS Notice 2020-39](#) providing relief for Qualified Opportunity Funds and investors

## **Paid Leave**

- [CRS Report: Payroll Tax Credit for COVID-19 Sick and Family Leave](#)
- [DOL revised regulations clarifying paid leave provisions under the FFCRA \(9/11/20\)](#)
- [DOL press release announcing revised FFCRA regulations](#)
- [DOL temporary regulations on paid leave under the FFCRA](#)
- [DOL temporary regulations on paid leave corrections](#)
- [DOL Press Release: U.S. Department of Labor Announces New Paid Sick Leave and Expanded Family and Medical Leave Implementation](#)
- [IR-2020-57: Treasury, IRS, and Labor announce plan to implement coronavirus-related paid leave for workers and tax credits](#)
- [News Release: Labor Department Issues Initial Guidance on Paid Leave](#)
- [FFCRA: DOL Questions and Answers](#)
- [DOL Fact Sheet for Employers](#)
- [DOL Fact Sheet for Employees](#)
- [DOL Field Assistance Bulletin \(FAB 2020-01\): Temporary Non-Enforcement Period Applicable to the Families First Coronavirus Response Act \(FFCRA\)](#)
- [IRS Notice 2020-21: Guidance on Effective Dates For Paid Leave Employment Tax Credits](#)
- [IRS Notice 2020-22: Relief from Penalty for Failure to Deposit Employment Taxes](#)
- [IRS FAQs: COVID-19-Related Tax Credits for Required Paid Leave Provided by Small and Midsize Businesses](#)

## **Payroll Tax Deferral**

- [Presidential Memorandum](#) on Deferring Payroll Tax Obligations in Light of the Ongoing COVID-19 Disaster
- [IRS Notice 2020-65](#) providing guidance on Presidential Memorandum deferring certain employee Social Security tax withholding

## **Real Estate Investment Trusts (REITs) and Regulated Investment Companies (RICs)**

- [IRS Revenue Procedure 2020-19](#) providing temporary guidance on the treatment of certain stock distributions by publicly offered REITs and RICs
- [IRS Revenue Procedure 2020-34](#) providing safe harbors for certain real estate held in trusts

## **Renewable Energy**

- [IRS Notice 2020-41: Safe Harbor Guidance on Renewable Energy Projects](#)

## **Tax-Exempt Bonds**

- [IRS Notice 2020-25](#) providing expanded temporary rule allowing governmental issuers to purchase certain of their own tax-exempt bonds
- [IRS Revenue Procedure 2020-21](#) providing temporary guidance regarding the public approval requirement under Internal Revenue Code section 147(f) for tax-exempt qualified private activity bonds
- [IRS Revenue Procedure 2020-48](#) extending until September 30, 2021 the temporary guidance in Revenue Procedure 2020-21 regarding the public approval requirement under Internal Revenue Code section 147(f) for tax-exempt qualified private activity bonds