

BEFORE THE TAX COMMISSION OF THE STATE OF IDAHO

In the Matter of the Protest of)	
)	DOCKET NO. 0-641-553-408
)	
Petitioner.)	DECISION
)	

██████████ (Petitioner) protested the Notice of Deficiency Determination (Notice) dated July 9, 2025, issued by the Idaho State Tax Commission’s (Tax Commission) Income Tax Audit (Audit). Petitioner disagreed with the Internal Revenue Service’s (IRS) adjustment to her federal income tax return for tax year 2022. The Tax Commission has reviewed the matter and upholds the Notice for the reasons stated below.

BACKGROUND

Audit received information from the IRS that adjustments were made to Petitioner’s 2022 federal income tax return. The IRS changed Petitioner’s filing status from Head of Household to Single and corrected the standard deduction to match the filing status. After reviewing the federal changes, Audit determined that Petitioner’s 2022 Idaho income tax return required a corresponding adjustment and issued a Notice.

Petitioner acknowledges that her filing status may have been incorrect due to technical requirements but asks for reconsideration due to financial hardship. She also stated she is actively working with the IRS to correct and resolve the issue. However, Petitioner did not provide any documents from the IRS showing that her federal audit was being reconsidered.

Audit acknowledged Petitioner’s protest and sent the case to the Tax Commission’s Appeals Unit (Appeals) for administrative review. Appeals reviewed the matter and sent Petitioner a letter stating the options available for redetermining a protested Notice. Petitioner did not

respond. Appeals then requested information from the IRS and found only payment activity posted to Petitioner's federal account transcript with no indication that the IRS made any changes to their audit or that a reconsideration was pending. Therefore, the Tax Commission decides the matter based on the information available.

LAW AND ANALYSIS

Idaho Code section 63-3002 states that it is the intent of the Idaho Legislature, insofar as possible, to make the Idaho Income Tax Code identical to the Internal Revenue Code in the way taxable income is determined. Idaho Code section 63-3069 (2000) states that upon a final determination of any deficiency or refund of federal taxes, written notice shall be immediately sent to the State Tax Commission by a taxpayer. Income Tax Administrative Rule 890.03, IDAPA 35.01.01 (1997) provides that negligence penalties may be imposed if a taxpayer has not provided the written notice within 60 days of the final determination.

From the cited Idaho Code sections and the Administrative Rule, it is clear the Idaho Legislature intended any changes made to the taxpayer's federal tax return to be reflected on the taxpayer's Idaho state tax return. Therefore, it is the Tax Commission's position that the adjustment made to Petitioner's federal return must be made to Petitioner's Idaho income tax return per Idaho Code.

CONCLUSION

Petitioner has the burden of proving the adjustment was incorrect and she has failed to meet that burden. Since Petitioner has not provided the Tax Commission with a contrary result to the federal redetermination, the Tax Commission must uphold the deficiency as asserted.

Audit added interest and penalty to Petitioner's tax deficiency. The Tax Commission reviewed those additions and found them to be appropriate and in accordance with Idaho Code sections 63-3045 and 63-3069, respectively.

THEREFORE, the Notice dated July 9, 2025, and directed to [REDACTED] [REDACTED] is hereby AFFIRMED and MADE FINAL.

IT IS ORDERED that Petitioner pay the following tax, penalty, and interest calculated per Idaho Code section 63-3045:

<u>YEAR</u>	<u>TAX</u>	<u>PENALTY</u>	<u>INTEREST</u>	<u>TOTAL</u>
2022	\$316	\$0	\$44	\$360

DEMAND for immediate payment of the foregoing amount is hereby made and given.

An explanation of Petitioner's right to appeal this decision is enclosed.

DATED this _____ day of _____ 2026.

IDAHO STATE TAX COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that on this _____ day of _____ 2026,
a copy of the within and foregoing DECISION was served by sending the same by United States
mail, postage prepaid, in an envelope addressed to:



Receipt No.
