

Instructions for Form 965-A



Department of the Treasury
Internal Revenue Service

(Rev. January 2021)

Individual Report of Net 965 Tax Liability

Section references are to the Internal Revenue Code unless otherwise noted.

Future Developments

For the latest information about developments related to Form 965-A and its instructions, such as legislation enacted after they were published, go to [IRS.gov/Form965A](https://www.irs.gov/Form965A).

What's New

In Parts I, II, and III of the form, line 4 is now designated for use for 2020 reporting.

Changes to the carryback of net operating losses. The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) added section 172(b)(1)(D)(i), which provides for a carryback of any net operating loss (NOL) arising in a taxable year beginning after December 31, 2017, and before January 1, 2021, to each of the five taxable years preceding the taxable year in which the loss arises, including those years in which a taxpayer had a section 965(a) inclusion (section 965 years). A taxpayer applying for a tentative refund resulting from the carryback of an NOL to a section 965 year must include with the Form 1045 an amended Form 965-A to record the amount of the change in the section 965 net tax liability, if any, caused by the NOL carryback, and a statement of explanation to explain the change in the section 965 net tax liability. See [Rev. Proc. 2020-24](#), 2020-18 I.R.B. 750, and [Frequently asked questions about carrybacks of NOLs for taxpayers who have had Section 965 inclusions](#) for additional information regarding the consequences of carrying back an NOL to a section 965 year, including limitations on refunds for taxpayers that carry back NOLs to section 965 years.

Reminders

The IRS has developed the following forms:

- Form 965-C, Transfer Agreement Under Section 965(h)(3).
- Form 965-D, Transfer Agreement Under Section 965(i)(2).
- Form 965-E, Consent Agreement Under Section 965(i)(4)(D).

The instructions for these forms contain information that may be useful to filers of Form 965-A. As such, references to these instructions have been added throughout the instructions for Form 965-A.

Background

On December 22, 2017, section 965 of the Code was amended. As a result of the amendment, certain taxpayers are required to include in income an amount (a section 965(a) inclusion amount) based on the accumulated post-1986 deferred foreign income of certain foreign corporations (specified foreign corporations) that are deferred foreign income corporations (DFICs) that they own either directly or indirectly through other entities. Other taxpayers may have inclusions in income under section 951(a) by reason of section 965 due to ownership of DFICs through domestic pass-through entities that are U.S. shareholders of the DFICs. When referring to both amounts in the preceding two sentences, these instructions use the term "section 965(a) inclusion." Section 965 also allows for a deduction (section 965(c) deduction). Section 965(a) inclusions and corresponding section 965(c) deductions are taken into account based on the last tax year of the DFIC that begins before January 1, 2018.

Certain taxpayers may make certain elections with respect to section 965. Relevant to this form, these elections include: (i) an election to pay a net 965 tax liability over 8 years, and (ii) an election by S corporation shareholders to defer payment of a net 965 tax liability with respect to an S corporation until a triggering event. In the case of the deferral election by S corporation shareholders, the deferred amounts are subject to annual reporting requirements, and when a triggering event occurs, the S corporation shareholder may then (subject to certain limitations) elect to pay the amount of the net 965 tax liability that is no longer subject to deferral over 8 years.

General Instructions

Purpose of Form

This form should be used by individual taxpayers and entities taxed like individuals (for example, certain trusts and estates). This form is used to report a taxpayer's net 965 tax liability for each tax year in which a taxpayer must report or pay section 965 amounts. In addition, this form is used to report the determination of a taxpayer's net 965 tax liability, whether or not to be paid in installments; the payments of a net 965 tax liability to be paid in installments; adjustments of any net 965 tax liabilities outstanding, including any net 965 tax liability of the taxpayer that has been assumed by another taxpayer or any net 965 tax liability that the taxpayer has assumed; an S corporation shareholder's net 965 tax liability with respect to an S corporation, whether or not to be deferred; and the beginning balance of, adjustments to, and ending balance of any deferred net 965 tax liabilities with respect to an S corporation. In summary, this form is intended to be a cumulative report of a taxpayer's net 965 tax liabilities through payment in full. This form must be completed by a taxpayer for every tax year for which the taxpayer has any net 965 tax liability outstanding and not fully paid at any point during the tax year, including deferred net 965 tax liabilities with respect to an S corporation.

Definitions

Deferred foreign income corporation (DFIC). A DFIC is, with respect to any U.S. shareholder, any specified foreign corporation (as defined under section 965(e)) of a U.S. shareholder that has accumulated post-1986 deferred foreign income (as defined under section 965(d)(2)) as of November 2, 2017, or December 31, 2017, that is greater than zero.

U.S. shareholder. For tax years of foreign corporations beginning before January 1, 2018, a U.S. shareholder is a U.S. person who owns (directly, indirectly, or constructively) 10% or more of the total combined voting power of all classes of stock of a foreign corporation. A U.S. person for this purpose is defined in section 957(c) of the Code.

Net income tax liability. The taxpayer's regular income tax liability reduced by the credits allowed under subparts A, B, and D of part IV of subchapter A (generally non-refundable credits; specifically, those credits allowed under sections 21 through 30D and sections 38 through 45T).

Net 965 tax liability. The excess of the taxpayer's net income tax liability computed with all section 965 amounts included ("with calculation") over the taxpayer's net income tax liability without regard to section 965 ("without calculation"). See

Regulations section 1.965-7(g)(10) for rules for computing the net 965 tax liability.

S corporation-related net 965 tax liability. With respect to an S corporation, the excess of the taxpayer's net income tax liability computed with all section 965 amounts included (which, in this case, includes only section 965 amounts allocated from such S corporation with respect to DFICs of which such S corporation is a U.S. shareholder) ("with calculation") over the taxpayer's net income tax liability without regard to section 965 ("without calculation").

Reporting year. The tax year of the return with which this form is being filed.

Who Must File

Any individual taxpayer (or taxpayer taxed like an individual) who has a net 965 tax liability for any tax year or has any net 965 tax liability remaining unpaid at any time during a tax year must file this form.

When and Where To File

File Form 965-A with the income tax return of the taxpayer for the reporting year by the due date (taking into account extensions, if any) of the return.

Electronic Filing of Form 965-A

If you file your income tax return electronically, Form 965-A is filed with the electronic income tax return. See the instructions for your income tax return for general information about electronic filing.

Specific Instructions

Amended Report

Check the amended report box at the top of page 1 of the form if Form 965-A is filed with an amended return that is filed to change any reporting related to section 965, regardless of whether a Form 965-A has previously been filed. The amended return box must also be checked for any amended Form 965-A filed with a Form 1045 applying for a tentative refund resulting from the carryback of an NOL to a section 965 year pursuant to section 172(b)(1)(D)(i).

Part I – Report of Net 965 Tax Liability and Election to Pay in Installments

Lines 1 through 8. Report in Part I net 965 tax liability amounts as follows.

On lines 1, 2 and 3, you must continue to report 2017, 2018, and/or 2019 amounts for all columns, including the original computation of net 965 tax liability reported in columns (b) through (i) on a prior-year Form 965-A. Report in column (j) any current-year net 965 tax liability transferred out (that is, for which you filed a valid transfer agreement as the transferor) or any current tax year subsequent adjustments. Also, complete column (k), if applicable.

For 2020 tax years, use line 4 to report section 965(a) inclusions derived solely through interests in pass-through entities that are U.S. shareholders of DFICs.

Use lines 5 through 8 to report other amounts of net 965 tax liability of the taxpayer, such as:

- **Installment liability transfers in.** The taxpayer may, in certain circumstances, and by agreement with the Secretary, assume as transferee the installment payment liability for the transferor's remaining net 965 tax liability and pay it in the same manner as if the taxpayer were the transferor. (See instructions

for Form 965-C for more details.) If this occurs, the transferee should complete one of lines 5 through 8 in Part I as follows:

- In column (a), enter the tax year of the net 965 tax liability for which the installment payment liability is being assumed. For example, if a net 965 tax liability incurred in tax year 2017 (with respect to which an installment payment election was made) was transferred to a transferee in 2022, in 2022 the taxpayer (transferee) reports "2017" in column (a).
- Skip columns (b) through (i).
- In column (j), report, as a positive number, the remaining installment payment liability (that is, original liability less payments made by the transferor) assumed by the taxpayer as transferee.
- In column (k), report the tax identification number of the transferor.
- Payments of such liability would then be reported on the corresponding line of Part II in the same manner as if the taxpayer were the transferor.

For example, assume Transferor had an original net 965 tax liability of \$100 in year 1, when an installment payment election was made. In years 1 through 5, Transferor reports payments of five 8% installments. Then, in year 6, the liability to pay the remaining installments (15%, 20%, and 25%) totaling \$60 is transferred to Taxpayer as transferee. Taxpayer would report on a line in Part I the tax year of the net 965 tax liability for which the installment payment liability is being assumed in column (a); the \$60 amount of the transfer as a positive number in column (j); and the tax identification number of Transferor in column (k). In addition, on the corresponding line in Part II, Taxpayer would report the \$15 installment payment made in column (g), Paid for Year 6 (the installment year as if Taxpayer were paying as Transferor). In the next reporting year, Taxpayer would report all the same information in Part II, plus the payment of \$20 (20% of the original \$100 liability) in column (h), Paid for Year 7. In the following reporting year, Taxpayer would report all the same information as in year 7, plus the final payment of \$25 (25% of the original \$100 liability) in column (i), Paid for Year 8.

- **Triggered deferred S corporation-related net 965 tax liability.** Deferred S corporation-related net 965 tax liabilities become subject to payment when a triggering event occurs. (See instructions for [Part III](#) and [Part IV](#) for information concerning the computation, reporting, deferral election, and triggering events for S corporation-related net 965 tax liabilities.) When such a deferred liability is triggered, it must be transferred from Part IV, where it is annually reported, to Part I, column (f). Such a triggered S corporation-related net 965 tax liability is generally eligible for an election to be paid in 8 installments beginning in the year of the triggering event. In the case of a triggering event with respect to a deferred S corporation-related net 965 tax liability, complete one of lines 5 through 8 as follows: In column (a), report the tax year in which the triggering event occurred. Skip columns (b) through (e) and report the triggered liability in column (f). Report in column (g) whether the taxpayer elected to pay the triggered liability in 8 installments by entering "Yes" or "No."



For certain triggered net 965 tax liabilities, the taxpayer may elect to pay in installments only with consent of the Secretary. (See instructions for Form 965-E for more details.) Without consent, the taxpayer must enter a checkmark in the "No" column of column (g) and enter the amount of the triggered liability in column (h).

- If the taxpayer does not (or cannot) elect to pay the triggered deferred net 965 tax liability in installments, then report the amount from column (f) in column (h). This should equal the payment reported in the corresponding line of Part II, column (b), Paid for Year 1.
- If the taxpayer elects to pay the triggered liability in installments, skip column (h) and report the amount from column

(f) in column (i). The corresponding line in Part II, column (b), Paid for Year 1, should report an 8% payment of the amount elected to be paid in installments. The remaining payments should generally be reported in subsequent reporting years according to the installment schedule. (See instructions for [Part II, line 1](#), for the general installment schedule.)

- If lines 5 through 8 do not provide adequate lines to report all the taxpayer's transactions described above, an additional Form 965-A should be used.

Note. Even if a net 965 tax liability was reported on a taxpayer's income tax return and fully paid, because no elections were made, the taxpayer must complete the appropriate line in Part I and report the related payment on the corresponding line in Part II, column (b).

Note. If an installment election under section 965(h) or a deferral election under section 965(i) was made, then the taxpayer must complete the appropriate line in Part I, as well as the corresponding line in Parts II through IV, as applicable, to report the status of the net 965 tax liability and any related adjustments for the reporting year.

Column (b). Report the taxpayer's net income tax liability for the tax year reported in column (a), with all section 965 amounts included ("with calculation").

Column (c). Report the taxpayer's net income tax liability for the tax year reported in column (a), without regard to section 965 ("without calculation").

Column (d). Report the excess of the taxpayer's "with calculation" reported in column (b) over the "without calculation" reported in column (c). This is the taxpayer's net 965 tax liability for the tax year reported in column (a).

Column (e). If the taxpayer is a shareholder in one or more S corporation(s) with section 965 amounts, report the total of column (g) from Part III for the tax year reported in column (a). This is the total S corporation-related net 965 tax liability the taxpayer elected to defer. See detailed instructions for [Part III](#) regarding the S corporation-by-S corporation calculations and elections.

Column (f). Report the amount in column (d), less the amount in column (e), if any. This is the taxpayer's net 965 tax liability eligible for the installment payment election.

Column (g). If the taxpayer made an election to pay a net 965 tax liability in installments over 8 years as provided for in section 965(h) and in the manner described in Regulations section 1.965-7(b)(2), enter a check mark in the "Yes" column. If "Yes," skip column (h) and enter the amount from column (f) in column (i). Otherwise, enter a check mark in the "No" column. If "No," enter the amount from column (f) in column (h) and skip column (i).



The actual payment of the first installment is due no later than the due date of the return for the tax year without extension, even if the election is made on a return filed by the extended due date.

Column (j). Report the following in column (j):

- Report, as a negative number, any net 965 tax liability for the year reported in column (a) that has been transferred out to a transferee, by agreement with the Secretary, under which the transferee becomes liable for the remaining installments due on the liability in the same manner as if such transferee were the taxpayer. (See instructions for Form 965-C for more details.) In addition, provide the tax identification number of the transferee in column (k). For example, if the taxpayer (transferor) incurred a net 965 tax liability in tax year 2017, for which an installment payment election was made, then properly transferred the

liability net of payments previously made, to a transferee in 2022, the taxpayer (transferor) would report, on line 1, column (j), as a negative number, the amount of the net liability transferred out. The making and reporting of payments on such liability should generally cease (see instructions for [Part II](#), later).

- Report any transfer in of a net 965 tax installment payment liability from a seller/transferor by a transferee (see the instructions for [Lines 1 through 8](#), earlier).
- Report subsequent adjustments to the net 965 tax liability for the tax year reported in column (a) for which no amended return was required to be filed, such as an audit adjustment. A liability increase should be reported as a positive number and a decrease as a negative number.

Note. An adjustment of a net 965 tax liability elected to be paid in installments is generally prorated to all installments.

For example, for tax year 2017, a taxpayer (TP) reported a \$100 net 965 tax liability for which an installment election was made. For each of years 1 through 5, TP pays and reports an \$8 installment. Also, in year 5, an audit adjustment increases the 2017 net 965 tax liability to \$150, a \$50 positive adjustment. No amended return was required and there was no negligence, intentional disregard, or fraud on the part of TP. This adjustment would be prorated to all the installments. TP would report the \$50 adjustment in Part I, line 1, column (j), as a positive number, so the reported adjusted liability would be \$150. In addition, TP would pay and report (in addition to the original \$8 installment reported for year 5) \$20 on Part II, line 1, column (f), representing 8% of the adjustment prorated to each of years 1 through 5, for which the installment due date had already arrived. For year 6, TP would pay and report \$22.50 (15% of the adjusted \$150 liability); for year 7, \$30 (20% of the adjusted \$150 liability); and for year 8, \$37.50 (25% of the adjusted \$150 liability).

In a case in which a net 965 tax liability for a tax year is both adjusted and transferred, report the net adjustment/transfer number in column (j), a transferee tax identification number in column (k), and provide a statement, attached to this form, which includes details of the amounts netted in column (j).

Part II – Record of Amount of Net 965 Tax Liability Paid by the Taxpayer

Part II is intended to be a cumulative record of the actual payments the taxpayer has made with respect to the net 965 tax liabilities reported in Part I.

Line 1. This line records the actual payments with respect to the net 965 tax liability reported on line 1 of Part I for the tax year 2017.

The general installment payment schedule for a net 965 tax liability subject to an election to pay in installments is:

1. 8% of the net 965 tax liability payable in year 1 (the year of the section 965(a) inclusion or triggering event with respect to a deferred S corporation-related net 965 tax liability),
2. 8% of the net 965 tax liability payable in year 2,
3. 8% of the net 965 tax liability payable in year 3,
4. 8% of the net 965 tax liability payable in year 4,
5. 8% of the net 965 tax liability payable in year 5,
6. 15% of the net 965 tax liability payable in year 6,
7. 20% of the net 965 tax liability payable in year 7, and
8. 25% of the net 965 tax liability payable in year 8.

If, for any reason, the actual payment differs from the schedule, report the actual payment made.

Example. If the reporting year is 2020 and the taxpayer is reporting a 2017 net 965 tax liability for which an installment

payment election was made, because the 2020 reporting year is “Year 4” with respect to a 2017 net 965 tax liability being paid in installments, installment payments reported in Part II on line 1, the line for 2017, should generally be:

- In column (b), Paid for Year 1, report 8% of the 2017 net 965 tax liability;
- In column (c), Paid for Year 2, report 8% of the 2017 net 965 tax liability;
- In column (d), Paid for Year 3, report 8% of the 2017 net 965 tax liability; and
- In column (e), Paid for Year 4, report 8% of the 2017 net 965 tax liability.

Column (a). Report the tax year of the section 965(a) inclusion, the net 965 tax liability for which an installment payment liability is being assumed, or triggering event with respect to a deferred S corporation-related net 965 tax liability, as reported on the corresponding line of Part I, column (a).

Columns (b) through (i). These columns are used to record the taxpayer’s cumulative payments, made each reporting year, for the net 965 tax liability reported on the corresponding line in Part I.

If no installment election is made, the net 965 tax liability reported in Part I, column (h), should be paid and reported on the corresponding line of Part II, column (b), Paid for Year 1, and the remaining payment columns (c) through (i) left blank.

If an installment election is made, and no transfers, acceleration events, or adjustments occur during the 8-year installment period, then 8% of the net 965 tax liability should be paid and reported in column (b), Paid for Year 1 (the year of the installment payment election). In the next reporting year, the relevant information from the prior reporting year should be carried forward, plus 8% of the net 965 tax liability should be paid and reported in column (c), Paid for Year 2. In future reporting years, the payments and payment reporting should continue similarly in accordance with the general installment payment schedule described above.

If the taxpayer transfers out a net 965 tax liability, then the making and reporting of installment payments should generally cease for the transferred net 965 tax liability in the year of transfer. However, reporting with respect to the net 965 tax liability is still required for the reporting year if any net 965 tax liability of the taxpayer remains unpaid at any time during the reporting year.

If an acceleration event occurs, then the unpaid portion of all remaining installments is due on the date of the acceleration event and should be paid and reported in the column for the year in which the acceleration event occurs; however, reporting with respect to the net 965 tax liability is still required for the reporting year if any net 965 tax liability of the taxpayer remains unpaid at any time during the reporting year.

If an adjustment occurs to a net 965 tax liability for which an installment election has been made, including on an amended return, the adjustment should generally be prorated over all the installment payments. For the part of the adjustment prorated to installments whose payment date has already arrived, adjust the payment for the reporting year in which the adjustment is made and report accordingly. For the part of the adjustment prorated to installments for which the payment date has not yet arrived, pay and report in accordance with the installment schedule.

Payments should include both actual installment payments made and excess payments of other income tax liabilities applied to the taxpayer’s net 965 tax liability.

Column (j). Report the net 965 tax liability remaining unpaid after the payment for the reporting year. This amount should equal the amount reported on the corresponding line in Part I, column (f), or column (i), as applicable, plus or minus any

amount reported on the corresponding line in Part I, column (j), less any payments reported in Part II, columns (b) through (i).

Column (k). For each line, report only the payment made (if any) for the reporting year.

Current-year reporting of column (k) amounts:

Individuals: For tax year 2020, enter the amount from Form 965-A, Part II, column (k), line 4, on Schedule 2 (Form 1040), line 9.

All others: For all other filers (that is, other taxpayers taxed like an individual), follow the form instructions for that other applicable return.

Part III – S Corporation Shareholder: Report of Calculation of Net 965 Tax Liability Related to 965 Amounts Allocated from an S Corporation and Election To Defer Such Net 965 Tax Liability

This Part allows a taxpayer that is an S corporation shareholder to report net 965 tax liabilities related to section 965 amounts with respect to S corporations. For each S corporation-related net 965 tax liability, the taxpayer may elect to defer payment of such liability until a triggering event occurs. (See instructions for [Part IV](#) for more information on triggering events.) Each S corporation-related net 965 tax liability is calculated on an individual S corporation basis, and an election to defer such liability is also made on an individual S corporation basis. Such liabilities deferred, if any, must be totaled by tax year, and the total carried to Part I, column (e), of the respective tax year line.

Lines 1 through 4. Report S corporation-related net 965 tax liabilities for the tax year indicated. On lines 1, 2 and 3, you must continue to report 2017, 2018, and/or 2019 amounts for all columns, even though they were reported on a prior-year Form 965-A. Space is provided for reporting net 965 tax liabilities related to up to four S corporations. If additional lines are needed for the tax year, use additional Forms 965-A.

Column (a). Report the name of the S corporation from which the taxpayer is allocated section 965 amounts. Abbreviate as needed.

Column (b). Report the tax identification number of the S corporation reported in column (a). The tax identification number of an S corporation is its employer identification number (EIN).

Column (c). Report the taxpayer’s net income tax for the tax year calculated only with section 965 amounts allocated from this S corporation with respect to DFICs of which the S corporation is a U.S. shareholder. This is the S corporation-related “with calculation.”

Column (d). Report the taxpayer’s net income tax for the tax year calculated without regard to section 965, that is, the “without calculation.” This should equal the taxpayer’s net tax liability without section 965 amounts for the corresponding tax year reported in Part I, column (c).

Column (e). Report the excess of the taxpayer’s S corporation-related “with calculation” reported in column (c) over the “without calculation” reported in column (d). This is the taxpayer’s S corporation-related net 965 tax liability with respect to this S corporation for the tax year.

Column (f). If the taxpayer made an election to defer payment of this S corporation-related net 965 tax liability as provided for in section 965(i) and in the manner described in Regulations section 1.965-7(c)(2), enter a check mark in the “Yes” column. Otherwise, enter a check mark in the “No” column.

Column (g). If the taxpayer elected to defer an S corporation-related net 965 tax liability, enter the amount from column (e). (If the election was not made, then the liability remains a part of the taxpayer's total net 965 tax liability subject to an installment payment election.) The total of column (g) for a tax year represents the taxpayer's total deferred S corporation-related net 965 tax liability for the tax year and should be entered on the corresponding tax year line in Part I, column (e).

Part IV – Annual Report of Deferred Net 965 Tax Liability Related to 965 Amounts Allocated from S Corporations

Any shareholder of an S corporation that makes an election to defer payment of an S corporation-related net 965 tax liability must report such liability with their income tax return for the year of election and every year thereafter through the year in which such amount is fully paid. Part IV provides for the required annual reporting of deferred S corporation-related net 965 tax liabilities and any adjustments related to such deferred liabilities during the reporting year.



If the taxpayer fails to report for any year information required to be reported under section 965(i)(7) by the due date of the return for such year, 5% of the deferred net 965 tax liability shall be assessed as an addition to tax for such reporting year.

Column (a). Report the year of:

- **Deferral election.** In a year for which an election is made to defer an S corporation-related net 965 tax liability, any amounts elected to be deferred must be transferred from Part III, column (g), to the corresponding line in Part IV, column (d). Enter the year for which the election is made in column (a) of the corresponding line.
- **Transfer in.** In certain circumstances, by agreement with the Secretary, a taxpayer may assume a deferred S corporation-related net 965 tax liability from another taxpayer who had elected to defer such amount. The transferee is liable for the deferred S corporation-related net 965 tax liability in the same manner as the transferor, including being subject to annual reporting requirements. (See instructions for Form 965-D for more details.) Enter the tax year of transfer in column (a). See the instructions for [Part IV, column \(g\)](#), later, for reporting the amount of the transfer in.

Column (b). Report the name of the S corporation to which the deferred net 965 tax liability relates. Abbreviate as needed.

Column (c). Report the tax identification number of the S corporation reported in column (b). The tax identification number of an S corporation is its employer identification number (EIN).

Column (d). Report the beginning deferred S corporation-related net 965 tax liability.

- For the year of the deferral election, this amount will be the S corporation-related net 965 tax liability for which the taxpayer elects to defer payment and should be transferred from the corresponding line for such S corporation in Part III, column (g).
- For subsequent reporting years, the amount reported should equal the amount on the corresponding line in column (i) from Part IV of Form 965-A for the prior reporting year.
- For assumptions of deferred S corporation-related net 965 tax liabilities, by agreement with the Secretary, the amount reported should equal the amount of S corporation-related net 965 tax liability assumed by the taxpayer.

Column (e). Reserved for future use.

Column (f). Report the amount of each deferred S corporation-related net 965 tax liability, payment of which ceases to be deferred as a result of a triggering event during the reporting year (“triggered S corporation-related net 965 tax liability”). The triggered S corporation-related net 965 tax liability amount should be reported in column (f) as a negative number and transferred to column (f) on one of lines 5 through 8 in Part I as a positive number. See *Triggered deferred S corporation-related net 965 tax liability*, in the instructions for [Part I, lines 1 through 8](#), earlier.

Column (g). Report the amount of deferred S corporation-related net 965 tax liability transferred out or in.

Transfers (out). When a taxpayer transfers stock of an S corporation with respect to which the taxpayer has made an election to defer payment of its S corporation-related net 965 tax liability, the transfer is not treated as a triggering event if the transferee, by agreement with the Secretary, becomes liable for the deferred S corporation-related net 965 tax liability in the same manner as the transferor. (See instructions for Form 965-D for more details.)

Report the amount of the transfer out as a negative number in column (g) of the same line as the taxpayer reported the deferred S corporation-related net 965 tax liability at the beginning of the reporting year.

In a case of multiple transferees, report the total deferred S corporation-related net 965 tax liability transferred as a negative number in column (g) and in column (h) report the tax identification number of a transferee and attach a schedule to Form 965-A providing a breakdown of the total deferred S corporation-related net 965 tax liability transferred and the associated tax identification numbers of each transferee.

Transfers in. A taxpayer may assume, by agreement with the Secretary, a deferred 965 net tax liability as a buyer/transferee of S corporation stock with respect to which the transferor has a deferred S corporation-related net 965 tax liability. The taxpayer will then be liable for the deferred S corporation-related net 965 tax liability in the same manner as the transferee, including being subject to annual reporting requirements, beginning for the tax year of transfer. (See instructions for Form 965-D for more details.) For the year of transfer, a new line in Part IV must be completed, skipping columns (d), (e), and (f), and entering in both columns (g) and (i) the deferred S corporation-related net 965 tax liability transferred in as a positive number.

For reporting years following the year of transfer, report the transferred deferred S corporation-related net 965 tax liability in the same fashion as all other deferred S corporation-related net 965 tax liabilities.

Column (h). Provide the tax identification number of the transferee or transferor.

Column (i). For each line, combine the amounts reported in columns (d) through (g).

Paperwork Reduction Act Notice

We ask for the information on this form to carry out the Internal Revenue laws of the United States. You are required to give us the information. We need it to ensure that you are complying with these laws and to allow us to figure and collect the right amount of tax.

You are not required to provide the information requested on a form that is subject to the Paperwork Reduction Act unless the form displays a valid OMB control number. Books or records relating to a form or its instructions must be retained as long as their contents may become material in the administration of any Internal Revenue law. Generally, tax returns and return information are confidential, as required by section 6103.

The time needed to complete and file this form will vary depending on individual circumstances. The estimated burden for individual taxpayers filing this form is approved under OMB

control number 1545-0074 and is included in the estimates shown in the instructions for their individual income tax return.