

LEGISLATIVE FISCAL OFFICE
Fiscal Note



Fiscal Note On: **SB 196** SLS 26RS 458

Bill Text Version: **ORIGINAL**

Opp. Chamb. Action:

Proposed Amd.:

Sub. Bill For.:

Date: March 20, 2026 1:27 PM	Author: FOIL
Dept./Agy.: Department of Revenue and Board of Tax Appeals	Analyst: Garrett Ordner
Subject: Notice of Assessment and Refund Claim Appeals	

TAX/TAXATION

OR SEE FISC NOTE GF RV

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Provides relative to the time period to appeal a notice of assessment or the disallowance of a refund claim. (8/1/26)

Present law provides that upon receipt of a notice of assessment and right to appeal for local sales and use taxes, the recipient must (1) pay the assessment within 60 days; (2) appeal to the Board of Tax Appeals (BTA) within 60 days; (3) pay under protest within 60 days and then either file suit or file a petition with the BTA; or (4) agree in writing with the collector to a mediation within 15 days. Present law provides that that a taxpayer has 60 days from the date of payment or posting bond to appeal to the BTA for a redetermination of the assessment when the tax is in jeopardy and property has been distrained. Present law provides a taxpayer 60 days for the date of notice of assessment from the Department of Revenue (LDR) to pay the assessment or appeal to the BTA for a reassessment, and present law provides a taxpayer 60 days after LDR disallows a refund claim to appeal the disallowance with the BTA.

Proposed law increases all of the above 60-day time limits to 90 days.

EXPENDITURES	2026-27	2027-28	2028-29	2029-30	2030-31	5 -YEAR TOTAL
State Gen. Fd.	\$0	\$0	\$0	\$0	\$0	\$0
Agy. Self-Gen.	\$52,750	\$0	\$0	\$0	\$0	\$52,750
Ded./Other	\$0	\$0	\$0	\$0	\$0	\$0
Federal Funds	\$0	\$0	\$0	\$0	\$0	\$0
Local Funds	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	

Annual Total

REVENUES	2026-27	2027-28	2028-29	2029-30	2030-31	5 -YEAR TOTAL
State Gen. Fd.	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	
Agy. Self-Gen.	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	
Ded./Other	\$0	\$0	\$0	\$0	\$0	\$0
Federal Funds	\$0	\$0	\$0	\$0	\$0	\$0
Local Funds	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	SEE BELOW	

Annual Total

EXPENDITURE EXPLANATION

The La Department of Revenue (LDR) reports that it will incur expenses totaling \$52,750 in FY 27 for programming, testing, and system development costs to implement the new payment deadlines in its system pursuant to proposed law. However, LDR expects to absorb these costs with its existing budget authority. Any corresponding costs to local tax collectors are indeterminable. The Board of Tax Appeals (BTA) reports that any changes to its costs will be minimal.

The BTA reports that it currently accepts all petitions filed by taxpayers. If a petition is filed late, the tax collector will file an exception pointing out the deficiency, and the BTA will conduct a hearing on the exception where the taxpayer and the tax collector can present evidence on whether the notice was appropriately issued or whether the prescription was suspended or interrupted. The BTA then rules on whether the case is dismissed or proceeds depending on whether it finds that the notice was appropriate and the appeal was untimely filed.

Proposed law may allow petitions that would otherwise have been untimely to instead proceed, which may reduce the number of exception hearings, but which may also increase the number of trials conducted on the merits of the case. BTA therefore expects that any costs incurred pursuant to proposed law will be minimal.

REVENUE EXPLANATION

LDR reports that the extended payment period will delay enforcement actions against delinquent taxpayers and therefore delay the collection of taxes, penalties, and interest, as well as LDR's collection fees. The extended payment period may have a similar effect on local tax revenues. The extent of any impacts on state and local revenues is indeterminable.

The extended appeal period offered by proposed law may also allow more appeals to proceed to trial on the merits of the appeal, which may ultimately have an impact on the assessment amount if the BTA finds in favor of the taxpayer.

Senate

Dual Referral Rules

House

13.5.1 >= \$100,000 Annual Fiscal Cost {S & H}

6.8(F)(1) >= \$100,000 SGF Fiscal Cost {H & S}

13.5.2 >= \$500,000 Annual Tax or Fee Change {S & H}

6.8(G) >= \$500,000 Tax or Fee Increase or a Net Fee Decrease {S}

Alan M. Boxberger

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Legislative Fiscal Officer