

Americas Tax Roundup

Latest news – Americas

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[US FY2024 Budget includes few new international tax proposals, largely reprising proposals from prior budgets](#)

In its [FY2024 explanation of the Biden Administration's revenue proposals](#), the US Treasury includes a number of international tax proposals from prior budgets but also describes a few new measures as part of the administration's FY 2024 Budget. While the prospects for enactment are dim this year, taxpayers should familiarize themselves with these proposals in case they appear as revenue offsets in later legislation.

[USCIS announces mail delivery process for receiving ADIT \(I-551\) stamp](#)

On 16 March 2023, US Citizenship and Immigration Services (USCIS) announced that lawful permanent residents (LPRs) may receive temporary evidence of their LPR status in the form of an Alien Documentation, Identification, and Telecommunication (ADIT) stamp (also known as an I-551 stamp) by mail, rather than scheduling an appointment at a local USCIS field office.

[Honduran Government to file new tax reform before the National Congress](#)

The Honduran Government announced that it will file before the National Congress a bill that would significantly reform the current tax system. The bill would establish a worldwide income tax that would apply to all local source and foreign source income and ratify the Convention on Mutual Administrative Assistance in Tax Matters.

[Costa Rican tax authority creates National Large Taxpayers Dialogue Forum](#)

Costa Rica's General Directorate of Taxation published a resolution, creating the National Large Taxpayers Dialogue Forum (Forum). The purpose of the Forum is to promote openness and collaboration between companies classified as national large taxpayers and the National Large Taxpayers' Directorate by sharing knowledge, participating in discussions and exchanging solutions to general tax issues of common interest.

[Costa Rican authorities amend Joint Resolution for Transparency and Beneficial Owner Register](#)

Costa Rica's tax authority and the Costa Rican Institute on Drugs published a resolution, modifying several provisions of the Joint Resolution for the Transparency and Beneficial Ownership Register. Specifically, the resolution modifies the time period for making corrections to the information submitted to the register.

[Council of Ministers of Economic Integration of Central America establishes US\\$3 charge for each DUCA-F transmitted through the SIECA platforms](#)

Through Resolution No. 471-2022, the Council of Ministers of Economic Integration (COMIECO) have established that as of 1 April 2023, the Secretary of Economic Integration of Central America (SIECA) will receive US\$3 for the service it provides in electronically transmitting through SIECA's electronic platforms each Central American Single Declaration (DUCA-F) used for the trade of goods originating in the Central American region. The COMIECO member states include Costa Rica, El Salvador, Guatemala, Honduras, Nicaragua and Panama.



[Uruguayan Tax Office clarifies substance requirements applicable to the corporate income tax's source criteria](#)
The Uruguayan Tax Office issued a resolution that clarifies several aspects of the substance requirements applicable to the corporate income tax's source criteria. The resolution went into effect on 15 March 2023.

[Canadian Post-Graduation Work Permit holder extensions announced](#)
On 17 March, Minister Sean Fraser announced that students holding a Post-Graduation Work Permit (PGWP) that expired or will expire in 2023 may be eligible to apply for an 18-month PGWP extension. This new PGWP extension program is scheduled to kick off 6 April. To qualify under this program, the foreign national must have a PGWP expiring in 2023.

[EY's 'Latest on BEPS and Beyond' for March 2023](#)
EY's Latest on BEPS and Beyond (March 2023 edition) highlights (1) the US President's release of the 2024 budget; and (2) Brazil's Normative Instruction on the early adoption of the new transfer pricing rules.

This week's tax treaty news in the Americas

- ▶ Brazil and Guernsey: text of exchange of information agreement approved by Brazilian Congress
- ▶ Canada and Austria: social security agreement entered into force
- ▶ Dominican Republic and Ecuador: administrative arrangement to social security agreement signed
- ▶ United States and Romania: social security agreement and administrative arrangement signed

Upcoming webcasts

[How recent developments potentially impact cross-border tax controversy procedures and processes \(30 March\)](#)
During this webcast, representatives from jurisdictions around the world will share emerging trends in cross-border controversy. They will also discuss the OECD's recently published Bilateral APA Manual, Manual on the Handling of Multinational MAPs and APAs, and the revised BEPS Action 14 review process.

[What to know about the 2023 EY Tax risk and controversy survey results – Americas and Europe \(5 April\)](#)
In this webcast for Americas and European audiences, EY explores how taxpayers perceive and manage tax risk and controversy in 2023.

[EY global economic webcast outlook \(19 April\)](#)
This webcast will examine the economic outlook for 2023–24 and how companies can adapt and thrive despite elevated economic uncertainty, financial market volatility and persistent inflation.

[Tax in a time of transition: Legislative, economic, regulatory and IRS developments \(21 April\)](#)
Please join us for a fast-paced overview of recent tax and economic developments designed to help you stay on top of changes in today's shifting economic, legislative and regulatory environment. In this regularly occurring webcast series, panelists will provide updates on: (i) the US economy and tax policy; (ii) what's happening at the IRS; and (iii) breaking developments.

[US corporate income tax compliance \(26 April\)](#)
The US corporate tax landscape continues to evolve as we prepare for the tax year 2022 filing season. Join EY professionals for an in-depth discussion of how companies can continue to navigate the complexity and challenges of ever-changing tax compliance, while preparing for tax year 2022 and beyond.

For a full list of upcoming webcasts, please access EY's webcast page on [ey.com](#) [here](#).



Recently archived webcasts

[EY Webcast addresses new developments about the US CHIPS and Science Act of 2022 \(21 March\)](#)

The CHIPS Act aims to build a domestic US supply chain for semiconductor chips in the face of foreign competition. The law includes \$52.7 billion in funding for semiconductor manufacturing subsidies, grants and loans. Please join a panel of subject-matter professionals from across the EY organization as they share their insights on the CHIPS and Science Act of 2022 and the application process.

Recently issued EY podcasts

[US Cross-Border Taxation weekly podcast, 24 March 2023](#)

EY's weekly US Cross-border Taxation podcast reviews the week's US international tax-related developments. Highlights this week include:

- ▶ IRS issues guidance on treatment of nonfungible tokens as collectibles, requests comments
- ▶ US Treasury official says IF unlikely to craft BEPS Pillar Two GloBE permanent safe harbor

You can register for this weekly podcast on Apple Podcasts [here](#).

This week's EY Global Tax Alerts

Americas Global Tax Alerts

- ▶ [Report on recent US international tax developments - 24 March 2023](#)
- ▶ [The Latest on BEPS and Beyond | March 2023 edition](#)
- ▶ [OECD updates to MAP and APA guidance have implications for US multinationals](#)
- ▶ [Costa Rican authorities amend Joint Resolution for Transparency and Beneficial Owner Register](#)
- ▶ [Costa Rican Tax Authority creates National Large Taxpayers Dialogue Forum](#)
- ▶ [Honduran Government to file new tax reform before the National Congress](#)
- ▶ [US FY2024 Budget includes few new international tax proposals, largely reprising proposals from prior budgets](#)
- ▶ [Uruguayan Tax Office clarifies substance requirements applicable to the Corporate Income Tax's source criteria](#)

Other Global Tax Alerts

- ▶ [Cyprus Tax Authority publishes 10-year government bond yield rates for NID purposes](#)
- ▶ [Germany Federal Ministry of Finance publishes draft BEPS 2.0 Pillar Two implementation bill](#)
- ▶ [Luxembourg submits draft legislation introducing public country-by-country reporting for multinational enterprises](#)
- ▶ [Nigeria's Tax Appeal Tribunal rules that network facilities/infrastructure providers should not be subject to the National Information Technology Development Act levy](#)
- ▶ [Türkiye introduces tax amnesty](#)
- ▶ [Türkiye introduces additional tax for 2022](#)



Human Capital Alerts

- ▶ China Mainland eases travel restrictions and reinstates certain visa-free policies
- ▶ Denmark passes bill simplifying hiring of third-country nationals
- ▶ France now requires new Declaration of Occupancy
- ▶ South Africa plans changes to address visa application backlogs and processing times
- ▶ Spain's Large Business Unit to now accept only digital signatures for work and residence permit applications
- ▶ UAE issues additional guidance on determination of tax residency for individuals
- ▶ USCIS Announces Mail Delivery Process for Receiving ADIT (I-551) Stamp

Indirect Tax Alerts

- ▶ Council of Ministers of Economic Integration of Central America establishes US\$3 charge for each DUCA-F transmitted through the SIECA platforms
- ▶ Saudi Arabia announces third wave of Phase 2 e-invoicing integration

EY Industry and Tax Services publications

Industry

Banking & Capital Markets

- ▶ Three ways to unleash the power of people in banking transformation

Technology, Media & Entertainment, and Telecommunications

- ▶ The CIO Imperative: How emerging tech can accelerate a path to sustainability

Services

People and workforce

- ▶ Updated: How COVID-19 is disrupting immigration policies and worker mobility: a tracker

Tax

- ▶ Why now is the time to prepare for the global tax transformation
- ▶ Five steps tax accounting teams can take to prepare for BEPS 2.0

Comments

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