Quarterly Return Monthly Payment Scheme under GST

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Registered person having aggregate turnover IN preceding FY up to Five (5) crore rupees

Sr. No.	Notification	Remarks	
1	Notification No. 82/2020 – Central Tax, dated 10.11.2020.	Makes the Thirteenth amendment (2020) to the CGST Rules 2017.	
2	Notification No. 84/2020 – Central Tax, dated 10.11.2020.	Notifies class of persons under proviso to section 39(1) of the CGST Act.	
3	Notification No. 85/2020 – Central Tax dated 10.11.2020.	Notifies special procedure for making payment of tax liability in the first two months of a quarter	

Sections & Rules to be considered

Section	Rules	Particulars
37	59	Furnishing details of outward supplies
38	59 and 60	Furnishing details of outward supplies
39	61 to 67	Furnishing details of returns

Whether tax required to be paid if there is Nil liability in preceding quarter

Eligibility for QRMP Scheme



Switching from fixed method to self assessment method

Interest liability if amount deposited in first two months is less than actual liability

Refund if tax paid in first two months is more than actual tax liability

Late Fee on Delayed Payment of PMT-06

GSTR-1 monthly or quarterly

27-12-2020

Conditions of scheme

CA AANCHALKAPOOR



Overview of QRMP (Quarterly Return Monthly Payment)

RULE 61

Effective from 01.01.2021

Form & Manner of Furnishing Return

3B made quarterly for

Agg Turnover upto
 Rs. 5 cr. As per
 84/2020

20th of Succeeding Month

Pay Tax through GSTR-3B

Monthly Filling

Pay Tax for each of first two months of the qtr = Form GST PMT-06 by 25th day of succeeding month

Quarterly

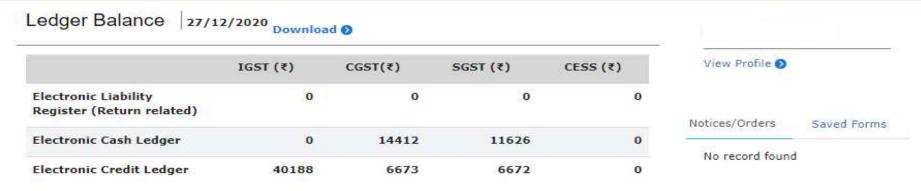
Filling

As per
States
22nd or 24th day of
month of
Succeeding quarter

- ☐ The amount deposited through PMT-06 for 1st and 2nd month will remain in the cash ledger and will be adjusted on filing 3B at the end of Quarter.
- Any claim of refund of such amount lying in balance in the electronic cash ledger, if any, out of the amount so deposited shall be permitted only after the return in **FORM GSTR-3B** for the said quarter has been filed.

SCREEN SHOT AGGREGATE TURNOVER

Aggregate annual turnover for the preceding financial year shall be <u>calculated in the common portal</u> taking into account the <u>details furnished in the returns by the taxpayer for the tax periods in the preceding financial year</u>



Annual Aggregate Turnover (includes all GSTINs of the related PAN)

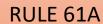
Financial Year Annual Aggregate Turnover

2019-20 Upto Rs.5 Cr*.

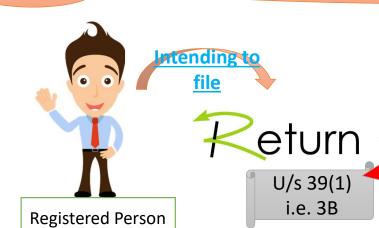
In case of any discrepancy in the turnover displayed, please lodge your grievance at selfservice.gstsystem.in



^{*}For Turnover calculation methodology Click here



Manner of opting for furnishing Quarterly Return-3B



Quarterly

Indicate his preference for furnishing of return on a quarterly basis, electronically, on the common portal, from the 1st day of the second month of the preceding quarter till the last day of the first month of the quarter for which the option is being exercised:

Example:- Option for filing return for **Jan- March, 2022** is to be selected

Option to be selected on the portal from 1st Nov,2021 to 31st Jap 2022.(subject to conditions)

Fixed Quarters in GST

RULE 61A(1)

Manner of opting for furnishing Quarterly Return-3B

New Rule Inserted

N. N. 84/2020-CT



Once option exercised, RP shall continue to furnish return on qtrly basis future tax periods unless

RP becomes **ineligible** for furnishing the return on a quarterly basis as per the conditions and restrictions notified in this regard



opts for furnishing of return on a monthly basis, electronically, on the common portal:

Condition

All Last returns due on the date of exercising such option must have been furnished.

RULE 61A(2)

RULE 61A(2)

If T.O. exceeds 5 crores being in QRMP

<u>example:</u> A registered person intending to avail of the Scheme for the quarter 'July to September' can exercise his option during 1st of May to 31st of July. If he is exercising his option on 27th July for the quarter (July to September), in such case, he must have furnished the return for the month of June which was due on 22/24th July

RP shall opt for furnishing of return on a monthly basis

From the first month of the quarter, succeeding the quarter during which his aggregate turnover exceeds 5 crore rupees.

e.g. Apr,2021 to June ,2021 Quarterly filling but exceeded Rs. 5 cr in this quarter in May, from July shall opt monthly filling

Circular No. 143/13/2020- GST

Quarterly Return Monthly Payment Scheme

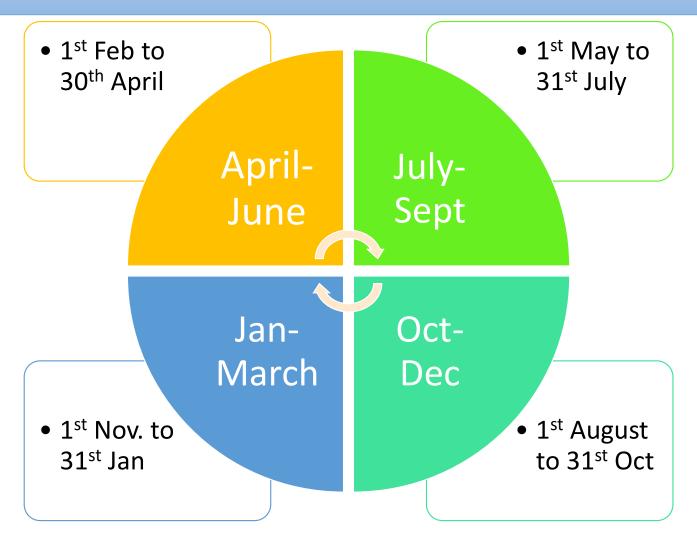
Registered persons are <u>not required to exercise the option every quarter</u>. Where such option has been exercised once, they shall continue to <u>furnish the return as per the selected option for future tax periods, unless they revise the said option</u>

Opting out of scheme

Opting out of the Scheme for a quarter will be available <u>from first day of second month of preceding quarter to the last</u> day of the first month of the quarter

QRMP Scheme is GSTIN wise and therefore, distinct persons as defined in Section 25 of the CGST Act (different GSTINs on same PAN) have the option to avail the QRMP Scheme for one or more GSTINs. In other words, some GSTINs for that PAN can opt for the QRMP Scheme and remaining GSTINs may not opt for the Scheme

Timeline for opting IN/OUT from QRMP Scheme



Notification 84/2020-CT

Deemed Option for GSTR-3B based GSTR-1

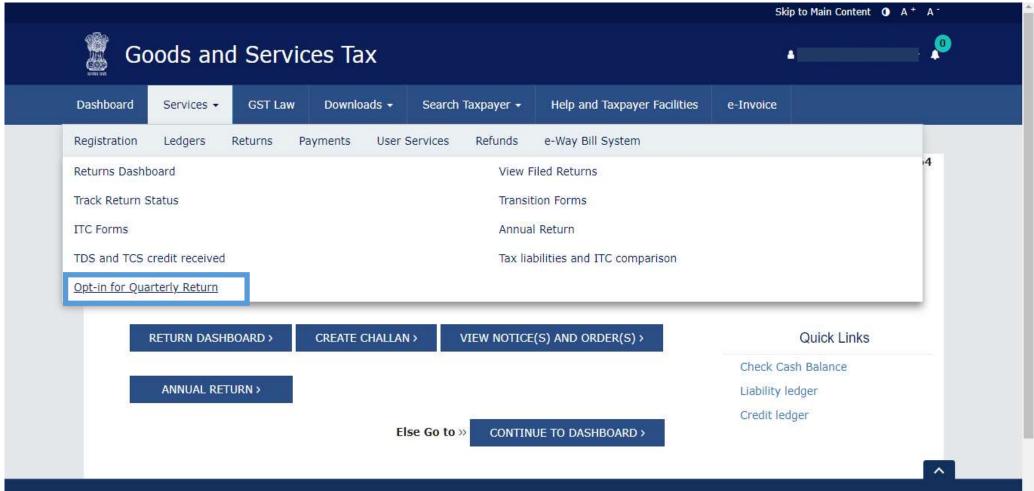
RP furnished the return 3B for the tax period October, 2020 on or before 30th November, 2020

SI. No.	Class of registered persons	Deemed option—3B
1	Aggregate turnover of up to 1.5 crore rupees, Form GSTR-1Quarterly in C/Y	Quarterly return
2	Aggregate turnover of up to 1.5 crore rupees, Form GSTR-1 Monthly in C/Y	Monthly return
3	Aggregate turnover >1.5 crore rupees =< 5 crore rupees in P/Y	Quarterly return

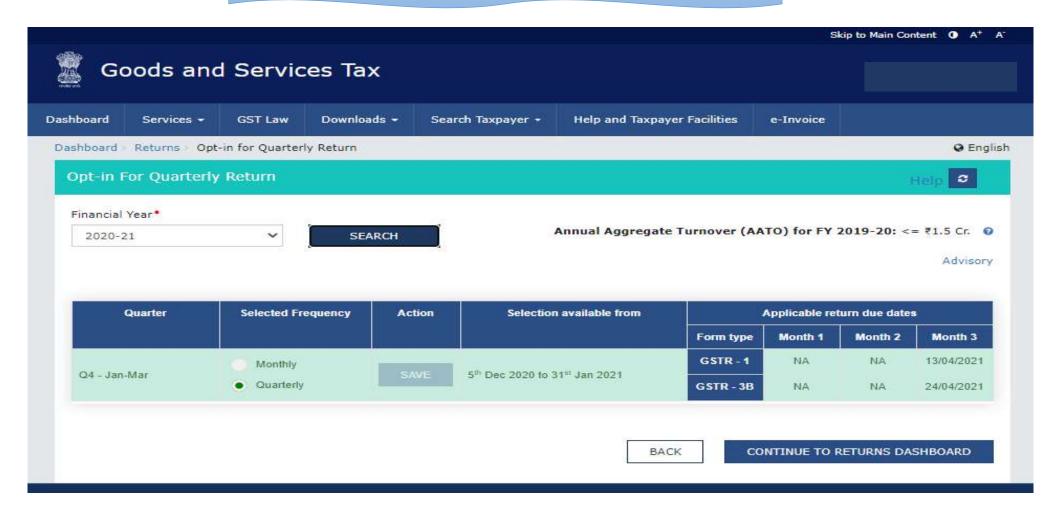
RP may change default option electronically on the common portal, during the period from the 5th day of December, 2020 to the 31st day of January, 2021.



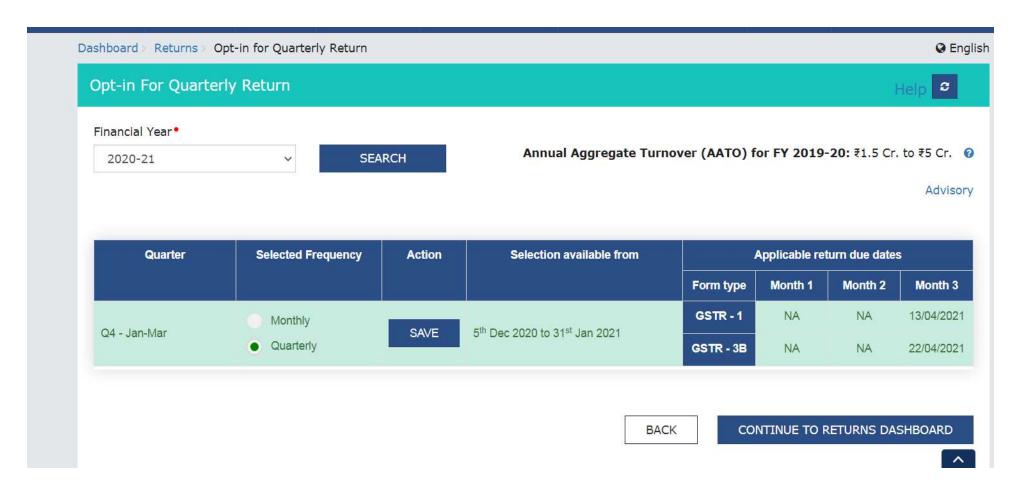
How to opt the QRMP Scheme?



How to opt the QRMP Scheme?



How to opt the QRMP Scheme?





Eligibility

Aggregate T.O. 4 Cr 3.5 Cr 4 Cr 6.5 Cr CA AANCHAL KAPOOR

Eligible





Up to Nov.

F.Y. 2019-20

F.Y. 2020-21

Up to Nov.

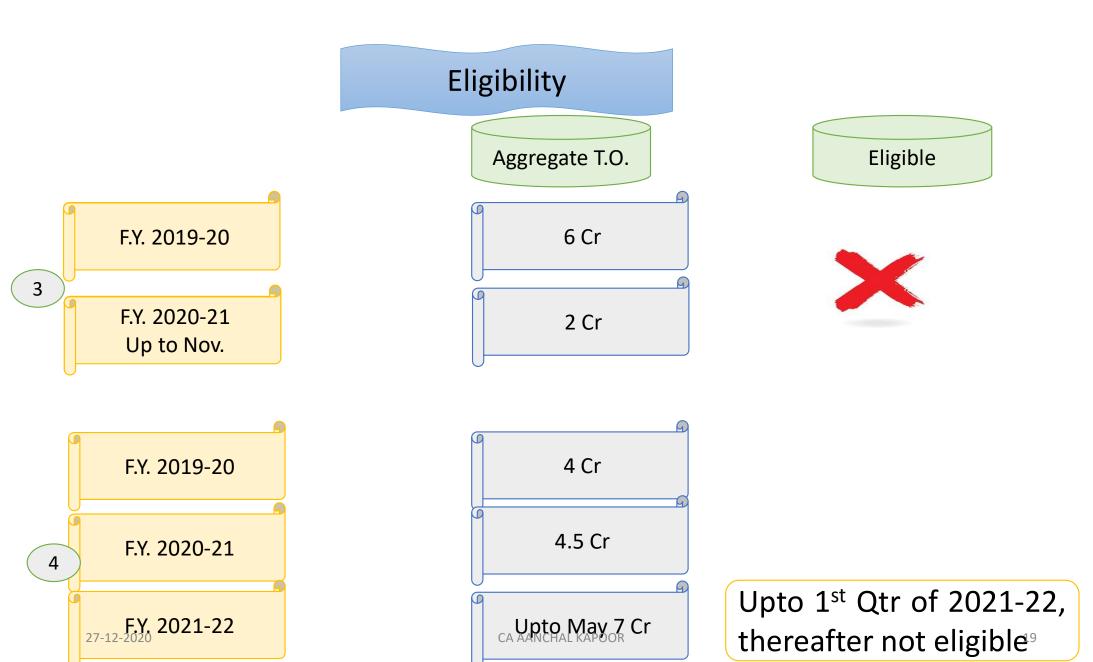
F.Y. 2019-20

F.Y. 2020-21

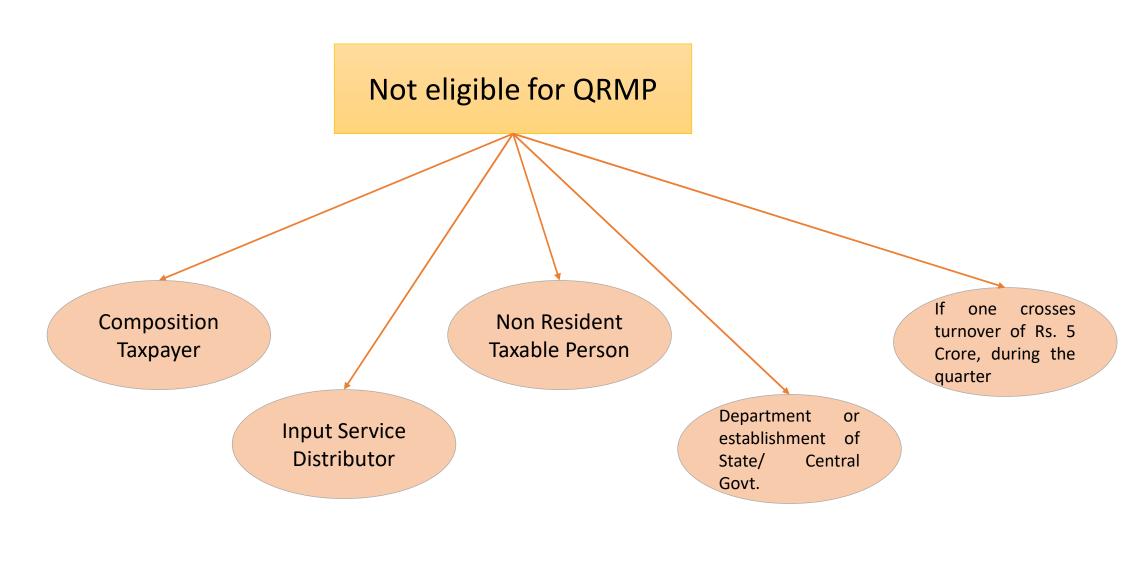
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27-12-2020

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Notification 85/2020-CT

Monthly
Deposit for
Month 1 &

Month 2

Fixed Sum Method

Available only if person was registered for complete preceding Tax

Period

35% of the tax paid in cash in the previous quarter

Monthly 38

Otrly 3B

100% of tax paid in cash in last month of the previous quarter

Self Assessment Method

Actual Output less Input

RP is free to avail either of the two tax payment method above in any of the two months of the quarter

Facilitate ITC calculationas per GSTR-2B

Complete Tax Period for Fixed Sum Method

A complete tax period means a tax period in which the person is registered from the first day of the tax period till the last day of the tax period.

Example :- If one is opting for the scheme on 25th January for Jan-Mar, 2021 quarter, then if got registration on 10th

December, then he cannot opt for Fixed Payment Method, as he was not registered on first day of Tax Period.

Consequences in case of cancellation of registration

- In case of cancellation of registration,
- such person during any of the <u>first two months of the quarter</u>,
- he is <u>still required to furnish return in Form GSTR-3B</u> for the relevant tax period.



✓	The Amount Deposited in First Two Months will be OFFSET ON FILLING OF GSTR-3B.
✓	Any claim of refund in respect of the amount deposited for the first two months of a quarter for payment of tax shall
	be permitted only after the return in FORM GSTR-3B for the said quarter has been furnished.
✓	Further, this deposit cannot be used by the taxpayer for any other purpose till the filing of return for the quarter

Notification 85/2020-CT



Special procedure for payment of tax under proviso to sec. 39(1)

Deposit of an amount in the electronic cash ledger equivalent to, -

- i. 35%. of the tax liability paid by debiting the electronic cash ledger in the return for the preceding quarter where the return is furnished quarterly; Or
- ii. the tax liability paid by debiting the electronic cash ledger in the return for the last month of the immediately preceding quarter where the return is furnished monthly:

Provided that no such amount may be required to be deposited-

- a) for the first month of the quarter, where the balance in the electronic cash ledger or electronic credit ledger is adequate for the tax liability for the said month or where there is nil tax liability;
- b) for the <u>second month of the quarter</u>, where the balance in the <u>electronic cash ledger or electronic credit ledger is adequate for the cumulative tax liability for the first and the second month of the quarter or where there is nil tax liability:</u>

Provided further that <u>registered person shall not be eligible for the said special procedure unless he has furnished the return for a complete tax period preceding such month.</u>

Explanation- For the purpose of this notification, the expression — a complete tax period means a tax period in which the person is registered from the first day of the tax period till the last day of the tax period.

Payment system

Pay tax every month by way of making a deposit of an amount in the electronic cash ledger equivalent to,

- i. thirty five per cent. of the tax liability paid by debiting the electronic cash ledger in the return for the preceding quarter where the return is furnished quarterly; or
- ii. the tax liability paid by debiting the electronic cash ledger in the return for the last month of the immediately preceding quarter where the return is furnished monthly:

Proviso

no such amount may be required to be deposited-

(a) for the first month of the quarter, where the **balance in the electronic cash ledger**

<u>Or</u>

electronic credit ledger is adequate for the tax liability for the said month

Or

where there is nil tax liability;

(b) for the second month of the quarter, where the balance in the electronic cash ledger or electronic credit ledger is adequate for the cumulative tax liability for the first and the second month of the quarter or where there is nil tax liability:

Monthly Payment of Tax

The registered person under the QRMP Scheme would be required to pay the tax <u>due in each of the first two months of the quarter</u> by depositing the due amount in FORM GST PMT-06, by the twenty fifth day of the month succeeding such month.

While generating the challan, taxpayers should select "Monthly payment for quarterly taxpayer" as reason for generating the challan

Methods for monthly payment of tax

Fixed Sum Method

A facility is being made available on the portal for **generating a pre-filled challan in FORM GST PMT-06** for an amount equal to

- 35% of the tax paid in cash in the preceding quarter where the return was furnished quarterly; or
- equal to the tax paid in cash in the last month of the immediately preceding quarter where the return was furnished monthly.

In case the last return filed was on quarterly basis for Quarter Ending March, 2021:

Tax paid in Cash in Quarter (January - March, 2021)		Tax required to be paid in each of the months – April and May, 2021	
CGST	100	CGST	35
SGST	100	SGST	35
IGST	500	IGST	175
Cess	50 27-12-2020	Cess	17.5

In case the last return filed was monthly		
for tax period March, 2021:		

Tax paid in Cash in March, 2021		Tax required to be paid in each of the months – April and May, 2021		
CGST	50	CGST	50	
SGST	50	SGST	50	(
IGST	80	IGST	80	`
Cess	-	Cess	- CA AANCI	IAL KAPOOF

Self assessment Method

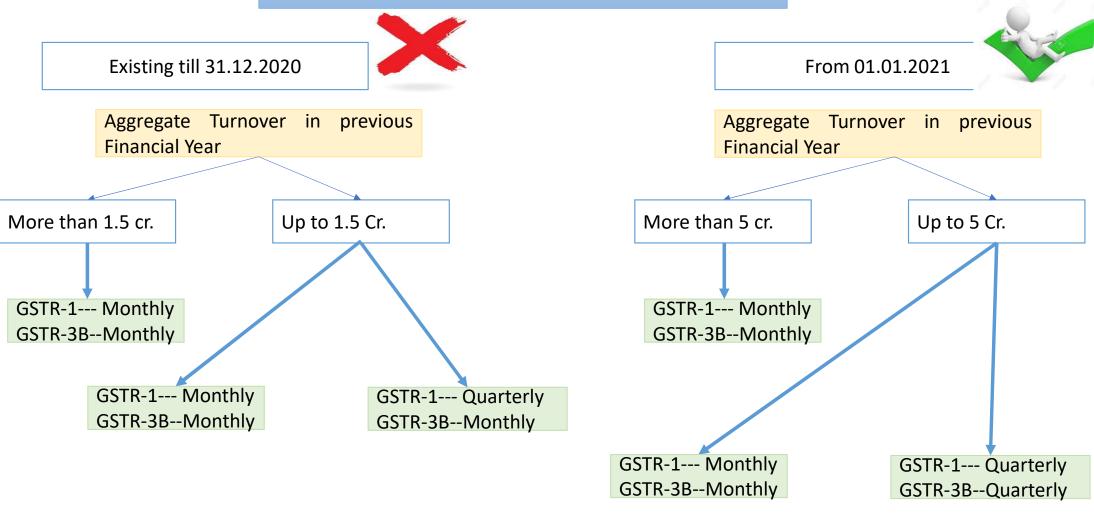
The said persons, in any case, can pay the tax due <u>by considering</u> the tax liability on inward and outward supplies and the input tax credit available, in FORM GST PMT-06.

In order to facilitate ascertainment of the ITC available for the month, an auto-drafted input tax credit statement has been made available in FORM GSTR2B, for every month.

Monthly tax payment through this method would not be available to those registered persons who have not furnished the return for a complete tax period preceding such month. A complete tax period means a tax period in which the person is registered from the first day of the tax period till the last day of the tax period



Return Filing Structure



Head wise Payment issue

Preceding Month

Only Cash Paid in CGST/SGST

QRMP First month

Payment is required in IGST

What would be auto-generation of Challan by the portal if it generated for IGST or vice-versa and supply is otherwise?

- ✓ It will be CGST/SGST
- ✓ It is pertinent to note that FOR Cash payment to be utilized in other head, one can use PMT-09.

Nil liability

☐ In case the balance in the electronic cash ledger and/or electronic credit ledger is adequate for the tax due (for the

first month or cumulative dues in the second month) **Or**

■ where there is a nil tax liability,

the registered person may not deposit any amount for the said months.

Example

Tax paid in Jan – Mar 2021 ----- 0.00

For Apr. 2021 not required to pay tax.

Returns under QRMP Scheme

The Form 'PMT 06' is required to be used for tax payment. The due date of the tax payment is the 25th of the succeeding month. While generating the challan, taxpayers should select "Monthly payment for the quarterly taxpayer" as a reason for generating the challan.

GSTR-3B

By 22nd or 24th of the month succeeding the quarter

For 1st Quarter of 2021-22 due date 22nd /24th July

GSTR-1

By 13th of the month succeeding the quarter

For 1st Quarter of 2021-22 due date 13th July

The registered persons opting for the Scheme would be required to furnish the details of an outward supply in FORM GSTR-1 quarterly as per rule 59 of the CGST Rule.



Interest Applicability

Fixed Sum Method

No interest would be payable in case the tax due is paid in the first two months of the quarter by way of depositing **auto-calculated fixed sum amount** as detailed in para 6.1(a) above by the due date.

In other words, if while furnishing return in FORM GSTR-3B, it is found that in any or both of the first two months of the quarter, the tax liability net of available credit on the supplies made /received was higher than the amount paid in challan, then, no interest would be charged provided they deposit system calculated amount for each of the first two months and discharge their entire liability for the quarter in the FORM GSTR-3B of the quarter by the due date.



In case such payment of tax by depositing the system calculated amount in **FORM GST PMT-06 is not done** by due date, **interest would be payable at the applicable rate**, from the due date of furnishing FORM GST PMT-06 till the date of making such payment.

Further, in <u>case FORM GSTR-3B for the quarter is furnished beyond the due date, interest would be payable</u> as per the provisions of Section 50 of the CGST Act for the tax liability net of ITC.

EXAMPLES

A registered person, who has opted for the Scheme, had paid a total amount of Rs. 100/- in cash as tax liability in the previous quarter of October to December.

He opts to pay tax under fixed sum method. He therefore pays Rs. 35/- each on 25th February and 25th March for discharging tax liability for the first two months of quarter viz. January and February.

In his return for the quarter, it is found that liability, based on the outward and inward supplies, for January was Rs. 40/- and for February it was Rs. 42/-.

No interest would be payable for the lesser amount of tax (i.e. Rs. 5 and Rs. 7 respectively) discharged in these two months provided that he discharges his entire liability for the quarter in the FORM GSTR-3B of the quarter by the due date.

A registered person, who has opted for the Scheme, had paid a total amount of Rs. 100/- in cash as tax liability in the previous quarter of October to December. He opts to pay tax under fixed sum method.

He therefore pays Rs. 35/- each on 25th February and 25th March for discharging tax liability for the first two months of quarter viz. January and February. In his return for the quarter, it is found that total liability for the quarter net of available credit was Rs. 125 but he files the return on 30th April.

Interest would be payable at applicable rate on Rs. 55 [Rs. 125 – Rs. 70 (deposit made in cash ledger in M1 and M2)] for the period between due date of quarterly GSTR 3B and 30th April

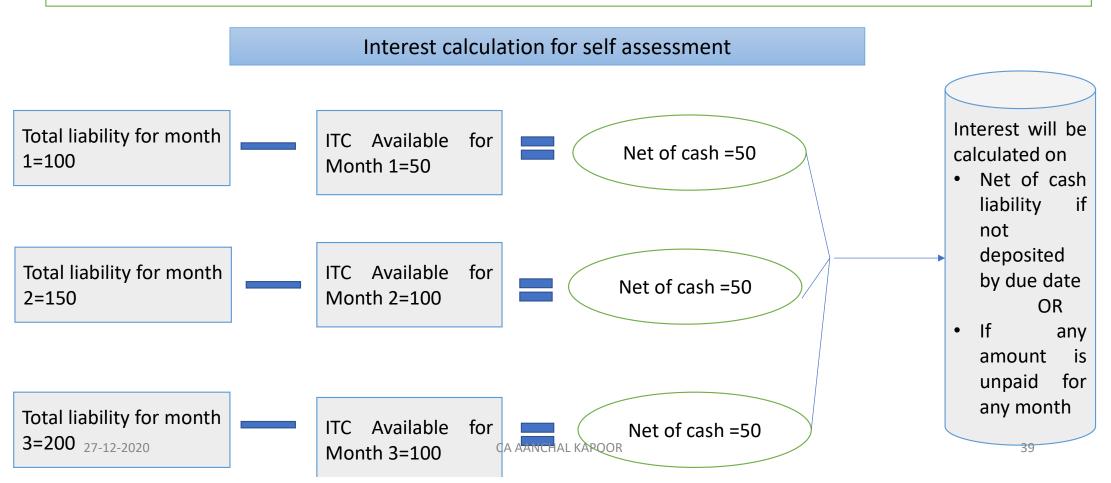
Interest under Fixed Sum Method

Tax due in 1 st month	PMT-06 filed on 25 th	Tax due for 2 nd month	PMT-06 filed on 25 th	Total Liability in the quarter(Net ITC)	Difference	GSTR 3B filed on due date	Interest Payable?	Remarks
35	Yes	35	Yes	150	80	Yes	No	-
35	No	35	Yes	150	80	Yes	Yes	Interest payable on 35 for no. of delay in filing 1st month PMT-06
35	Yes	35	No	150	80	Yes	Yes	Interest payable on 35 for no. of delay in filing 2 nd month PMT-06
35	Yes	35	Yes	150	80	No	Yes	Interest payable on 80 for no. of days delay in filing 3B
35	No	35	No	150	80	No	Yes	Interest to be calculated separately for No. of days delay in 1 st month PMT-06, 2 nd month PMT-06 and GSTR 3B

Interest Applicability

Self Assessment method

Interest amount would be payable as per the provision of Section 50 of the CGST Act for tax or any part thereof (net of ITC) which remains unpaid / paid beyond the due date for the first two months of the quarter.





Late Fee Under QRMP Scheme

Late Fee is applicable only for the delay in furnishing the GSTR 3B and GSTR 1

For Quarterly GSTR 3B filers, the late fee will apply only on the delay in furnishing the GSTR 3B for the quarter.

No late fee if the PMT-06 is filed beyond the due date during M1 and M2

Is scheme applicable GSTIN wise or PAN wise?

➤ It is clarified that for calculating aggregate annual turnover, the turnover of PAN shall be considered. And while opting for the scheme, taxpayer can opt in as per GSTIN wise.

Example:- If ABC Ltd, is having PAN based turnover of Rs. 3.67 Crore, then it can opt for the scheme. Now, it's having 3 GSTIN A, B, C, then GSTIN A can opt for the scheme. It is not compulsory that all GSTIN should opt for the scheme.

Due Date for filling quarterly returns and payment of tax?

Due date for filling GSTR 3B would be 22nd or 24th day of month succeeding such quarter. The due date for filling GSTR 1 would be 13th day of month succeeding such quarter. Also, the tax shall be paid by 25th day of the succeeding month due in each of the **first two months**.

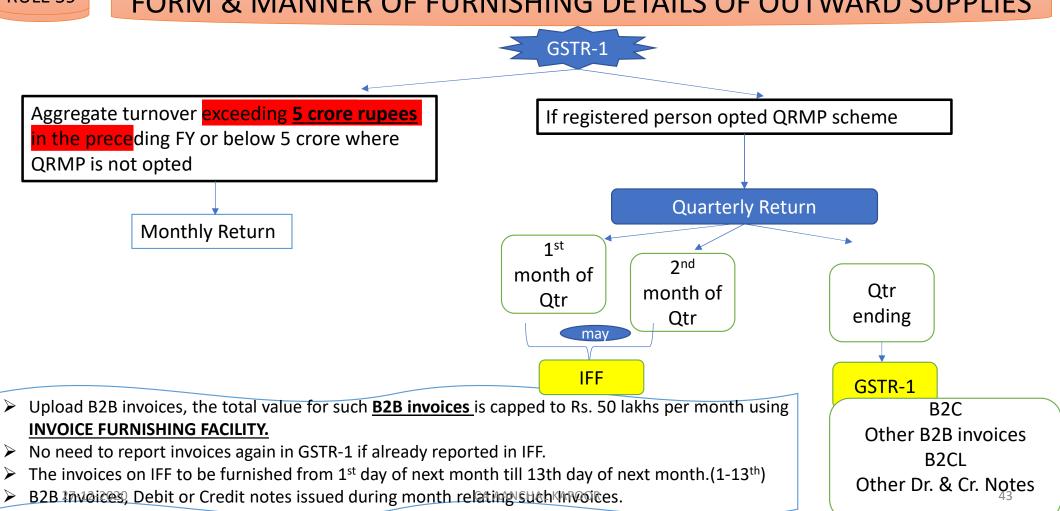
Notification No. 82/2020-CT(R) Dated 10.11.2020

GSTR 1

Effective from 01.01.2021

RULE 59

FORM & MANNER OF FURNISHING DETAILS OF OUTWARD SUPPLIES



Example of Timelines for IFF

For January Upload invoices in IFF till 13th February

For February Upload invoices in IFF till 13th March

For March Upload invoices in GSTR 1 till 13th April

RULE 60

FORM & MANNER OF ASCERTAINING details of INWARD Supplies

Effective from 01.01.2021

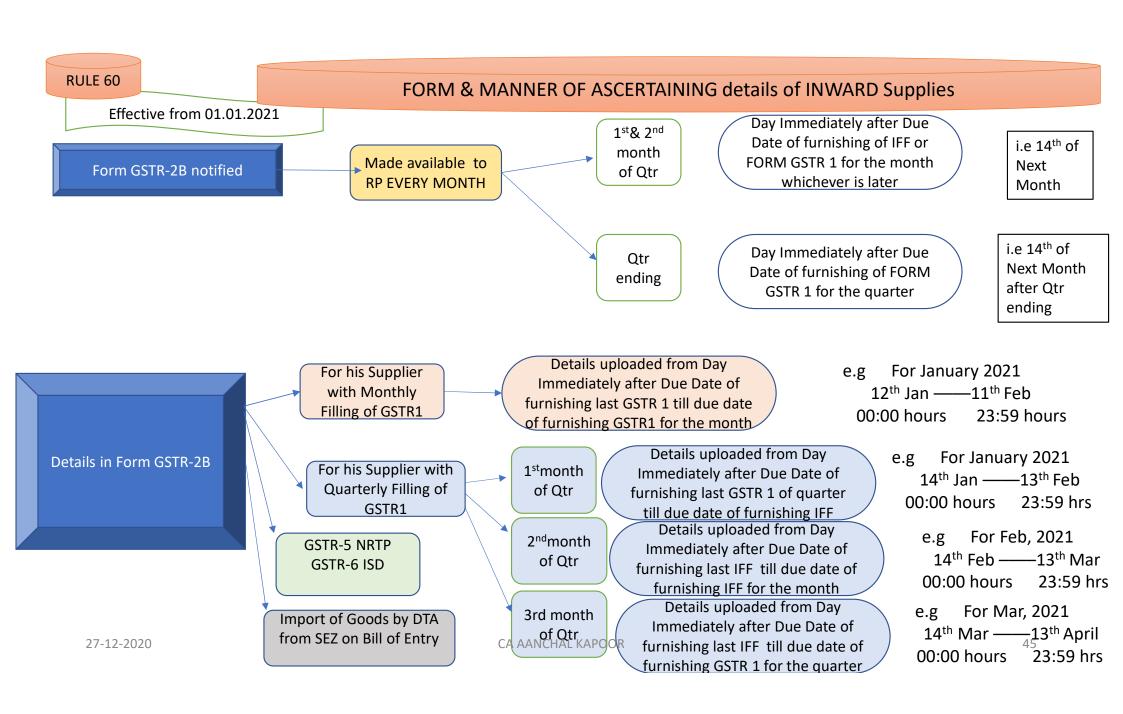
Invoices uploaded in IFF will appear in

PART A of GSTR 2A Form GSTR-4A Form GSTR-6A

Import of Goods by DTA from SEZ on Bill of Entry

PART D OF GSTR 2A

CA AANCHAL KAPOOR



Return filing due dates w.e.f. 1st Jan 2021

Category of taxpayers	GSTR-1	Invoice filing facility	PMT-06 for Month 1	PMT-06 for month 2	GSTR 3B
Taxpayer who are required to file monthly return: Taxpayers whose aggregate turnover is over Rs. 5 crore		NA	NA	NA	20 th of the following month
Taxpayer who have opted for QRMP scheme	·	1 st to 13 th day in Month 1 & Month 2	•	•	•



Benefits of QRMP

Compliance burden of the taxpayer will be reduced significantly

Taxpayer needs to file only 4 GSTR-3B returns instead of 12 GSTR 3B returns in a year.

Taxpayer would be required to file only 4 GSTR -1 returns since invoice filing facility is provided under the scheme

Pay the tax on monthly basis either by fixed sum method or self assessment method by generating pre filled challan selecting "Monthly payment for quarterly taxpayers"

Furnish invoice details in IFF depending upon the requirement of their recipient, for first two months of the quarter. The remaining invoice details can be furnished in the quarterly GSTR-1

Important points regarding GSRT 1 (Notified vide NN 94/2020 CT dt 22-12-2020

- ■A registered person shall not be allowed to file GSTR-1 if he has not furnished the GSTR 3B for the preceding 2 months.
- A registered person who opted for the QRMP scheme shall not be allowed to furnish the GSTR-1 or use the IFF, if he has not furnished the GSTR 3B for the preceding tax period.
- A Registered person who is restricted from using the amount in the credit ledger in terms of Rule 86B shall not be allowed to be allowed to file the GSTR-1 or use the IFF if he has not furnished the GSTR 3B for the preceding tax period.
- •With effect from Jan 2021, where the value of taxable supply in a month exceeds Rs. 50 Lakhs (excluding exempt supply and zero-rated supply), the registered person shall be allowed to use the credit ledger only for discharge of 99% of the tax liability (New Rule 86B inserted)(subject to Exceptions)

THANK YOU

Disclaimer

The views expressed are solely of the author and the content of this document is solely for information purpose and not to be construed as a professional advice. In cases where the reader has any legal issues, he/she must in all cases seek independent legal advice.



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