

## Income/Franchise:

### Massachusetts: Proposed Amended Nonresident Income Tax Rule Reflects How Pass-Through Entities Must Source Income

*Proposed Amended Rule 830 CMR 62.5A.1, Mass. Dept. of Rev. (11/13/24); Notice of Public Hearing, December 16, 2024, Mass. Dept. of Rev. (11/13/24).* The Massachusetts Department of Revenue proposed amendments to its rule on the application of Massachusetts personal income tax law to nonresidents – clarifying that for taxable years beginning on or after January 1, 2025, pass-through entities must apportion their taxable net income using the single sales factor apportionment rules under Mass. Gen. Laws. c. 63, § 38. The proposed amendments also establish certain exemptions from the requirement that married individuals must file a joint Massachusetts income tax return for any year for which they file a joint federal income tax return. A virtual public hearing on the proposal is scheduled for December 16, 2024. Please contact us with any questions.

**URL:** <https://www.mass.gov/regulations/830-CMR-625a1-non-resident-income-tax-proposed-regulation>

**URL:** <https://www.mass.gov/info-details/notice-of-public-hearing-december-16-2024>

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