

Activities to be undertaken for GST Compliances of FY 2022-23 in March 2023

We are fast approaching the end of the financial year 2022-23. It mandates for some activities to be carried out under GST laws for smooth transition to Financial Year 2022-23. We have listed down certain important activities for the smooth transition/ closure of Financial Year 2022-23:

A. Availment of correct Input Tax Credit for the FY 2022-23

1. Prepare the yearly reconciliation of ITC booked in books and ITC availed in GSTR 3B during the FY 2022-23 and availed in the subsequent month's GSTR 3B till 30th November 2023 or date of filing Annual return for FY 2022-23, whichever is earlier and reconcile the same with GSTR 2B.
2. Follow up with suppliers to furnish/report transactions in their GSTR 1 with payment of taxes in GSTR 3B in case stated transactions is not populated in your GSTR 2B.
3. Identify the ineligible ITC (Blocked credit/ ITC on exempt supplies) already availed in GSTR 3B of the FY 2022-23 and reverse/pay the same along with interest thereon @24% if ITC being utilized to avoid the litigation and demand of interest & penalty in future. Further, note that no interest & penalty leviable on reversal of wrongly availed credit but not utilised.
4. Prepare and Review that any payment to suppliers is not pending beyond 180 days from the date of issuance of supplier's invoice. If such ITC is availed without making payment within 180 days from date of issuance of invoice, then said ITC needs to be reversed along with interest @ 18%. Further, re-avail such ITC in subsequent month's GSTR-3B if payment has been made without any time limit (i.e. even post-filing of GSTR 3B for October 2023 as the time limit for availing ITC u/s 16(4) of CGST Act is not applicable in the case of re-availment of input tax credit).
5. In case of purchases made from any composition supplier, ITC is not available and should not be booked in books as well as availed in GSTR 3B. If done, then, reverse the same in books as well as in return.
6. Compile & reconcile ITC auto populated in GSTR 2A/2B for full FY 2022-23 and for the period April to October 2023 (relevant for FY 2022-23) and identify the suppliers whose registration has been either cancelled or suspended for any reasons during the FY 2022-23 for your onward needful actions.

7. In compiled data of GSTR 2A/2B, check status of date of filing of GSTR-1 and GSTR 3B of the suppliers to know whether your suppliers are tax compliant or not as your ITC has been made totally dependent on the compliances done by the suppliers.
8. Check for the transactions covered under reverse charge mechanism (RCM) either from registered suppliers or unregistered suppliers and make the payment of tax under RCM as per time of supply provisions and claim ITC if not done earlier. Also, raise the self-invoice in case of specified goods or services covered under RCM, received from unregistered person.

B. Reporting of correct outward supplies for the FY 2022-23

1. Prepare and reconcile the turnover as reported in GSTR 1/GSTR 3B with books of accounts for FY 2022-23. Also, check that it has been classified under correct HSN/ SAC code and correct GST rate has been levied on the same. Further, any outward supplies of FY 2022-23 shown in a period of April to October 2023 should be captured properly for proper disclosure in GSTR 9 & GSTR 9C of FY 2022-23.
2. Compile and reconcile the amount of taxes paid in GSTR 1 and GSTR 3B filed during the FY 2022-23 with books of accounts and pay the tax if there is any shortfall vide filing DRC 03 to avoid the litigation and penalty.
3. Prepare the reconciliation of E-way bills generated during the FY 2022-23 with tax invoices reported in GSTR 1 and give prior intimation to the department in case of any deficiency.
4. In case of compulsory generation of e-invoices, check & reconcile whether all the tax invoices for B2B supplies have been duly reported on dedicated e-Invoice portal and IRN generated with QR code and digitally signed. If not, then kindly report the same on e-invoice portal and take the necessary action in subsequent month's GSTR 1. Further, pls prepare reconciliation with e-invoices with IRN viz. e-way bills generated viz. reported or furnished in GSTR 1.
5. Check whether all the invoices raised during the FY 2022-23 have been properly reported in GSTR 1 and taxes have been paid thereon in GSTR 3B. In case, any kind of amendment required viz. GSTIN, Invoice Number, Invoice Date, Taxable Value, taxes, B2C to B2B, etc., needs to be done, then the same must be done till 30th November 2023 or date of filing Annual return for FY 2022-23, whichever is earlier.

6. Check whether the GST paid on advances received in FY 2022-23 towards the supply of services made or agreed to be made has been properly adjusted in GSTR 1 and GSTR 3B.
7. Check the tax compliances in case of supply of business assets during the FY 2022-23 on which ITC has been availed.
8. In case of material sent for job work, check whether the same has been returned within the time limit prescribed (Inputs – 1 year and Capital goods – 3 years) and the same has been duly reported in ITC 04.
9. Check whether the goods sent on approval basis has been either returned within 6 months or sold on issuance of tax invoices.

C. Important Activities to be undertaken.

1. Important step to be taken by the exporters before the beginning of FY 2023-24: Apply for Letter of Undertaking (LUT) in Form GST RFD 11 for FY 2023-24 to continue export of goods/services or supplies to SEZ without payment of GST from 01st April 2023.
2. Time limit to avail option to opt out from the QRMP Scheme: Taxpayers having Turnover below Rs 5 Crores shall have an option to select the frequency of GST return filing for FY 2023-24 till 30th April 2023. So, if the taxpayers have opted for Jan – Mar 2023 and want to continue monthly filing of returns from FY 2023-24, they need to take action by 30th April 2023.
3. Time limit for availing ITC pertaining to the FY 2022-23 coming to an end: Avail the ITC pertaining to FY 2022-23 till 30th November 2023 or the date of filing of Annual return for FY 2022-23 whichever is earlier. Hence, prepare reconciliation of ITC for FY 2022-23 is availed in FY 2022-23 and in the period April to October 2023 for proper disclosure in GSTR 9 & GSTR 9C of FY 2022-23.
4. Time limit for issuance of credit notes under GST for FY 2022-23: Credit Notes for supplies made during FY 2022-23 can be issued but not later than 30th November 2023 or the date of filing of Annual return for FY 2022-23 whichever is earlier. Hence, capture CN details of FY 2022-23 is shown in FY 2023-24 and in the period April to November 2023 for proper disclosure in GSTR 9 & GSTR 9C of FY 2022-23.

D. Other Important Aspects for FY 2022-23

1. Check whether the purchase (ITC) register prepared for FY 2022-23 contains all necessary details/ information like tax invoice no./ date, description of goods or services, nature of goods or services like -inputs/capital goods/input services and account head, etc. for ITC matching with supplier's invoice.
2. Computation of reversal of ITC under Rule 42 and Rule 43
3. Check whether the sales register (Output taxes) captures all the necessary/ details information as required.
4. Check the tax has been correctly calculated and paid under RCM in case of import of Services, sitting fees paid to directors, GTA, Security Services, rent a Cab, Advocate fees, etc.
5. Ensure that all the other provisions of GST Law have been duly complied with.
6. Reconcile GST TDS/TCS credit reconciliation with e-Cash Ledger on GST portal and books of accounts for FY 2022-23.
7. Reconciliation of E-Credit ledger with books of accounts for FY 2022-23.
8. For the purpose of reporting under clause 44 of the Tax Audit Form (Form 3CD) for Financial Year 2022-23, the entity (on which Tax Audit is applicable in accordance with relevant section of the Income Tax Act, 1961) needs to disclose the break-up of total expenditure of entities registered or not registered under GST. The entity is advised to prepare following working for the purpose of reporting the expense under the aforesaid clause in the Form 3CD :-
 - (I). Total Amount of Expenditure (capital expenditure as well as revenue expenditure) incurred during FY 2022-23.
 - (II). Expenditure in respect of entities registered under GST.
 - (III). Expenditure in respect of entities not registered under GST.
 - (IV). Expenditure relating to goods or services exempt under GST.
 - (V). Expenditure relating to entities falling under composition scheme.
 - (VI). Expenditure relating to other registered entities.

(VII). Total payment to registered entities.

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