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semplice e veloce, accedendo al servizio on-line "Rateizza adesso", presente nella propria area riservata del portale
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**RICHIESTA O PROROGA DI RATEIZZAZIONE SECONDO UN PIANO ORDINARIO
MAX 72 RATE - IMPORTI FINO A 120.000 EURO¹ (Art. 19 DPR n. 602/1973)
PER TUTTI I SOGGETTI**

Il/La sottoscritto/a..... nato/a il.....
a..... (Prov.....) codice fiscale.....
 in proprio (persone fisiche);
 in qualità di..... (specificare se titolare di ditta individuale/legale rappresentante/tutore/curatore.....)
del/della..... (Prov.....) In.....

ai fini dell'esame e della trattazione di questa richiesta dichiara di essere.....
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**THE INSTALMENT PLAN
OF THE NOTICES OF PAYMENT**

HANDBOOK

THE INSTALMENT PLAN OF THE NOTICES OF PAYMENT

HANDBOOK

(September 2024)

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INTRODUCTION

With the aim of **simplifying** and **streamlining** the **fulfilment** of the obligations of taxpayers, the Italian Revenue-Collection Agency (from this point forward also referred to as the RCA or the Tax Collection Agent) is currently undertaking the process of **upgrading** its **services** and **simplifying** the methods of use.

One of the first measures is related to the **payment of debts**. In fact, an **instalment plan** is envisaged for the sums claimed by the RCA in the relevant notices of payment. This instalment plan is designed for taxpayers who want to be compliant and settle the amount due, but who are unable to pay with a single payment.

Specifically, Article 19 of the Decree of the President of the Republic No. 602/1973 and Article 26 of Italian Legislative Decree No. 46/1999 assign the power to defer payment of sums enrolled in the tax register to the Tax Collection Agent.

Taxpayers have the right to request the Italian Revenue-Collection Agency to divide the payment into an instalment plan based on the amount of the debt and the economic conditions declared or, as explained in this handbook, supported by the relevant documents.

An instalment plan is granted for a maximum period of six years in the case of ordinary instalment plans, and 10 years in the case of extraordinary instalment plans, extendable, and subject to a minimum limit of EUR 50 for each instalment payment.

This guide provides information on what type of **sums** are eligible for the **instalment plan**, how to submit an application, the methods of **payment** of the instalments and the **effects of the instalment plan** or of the **possibility of a lapse**.

For information, the relevant forms and to submit applications for an instalment plan:

www.agenziaentrateriscossione.gov.it



1. WHEN AN INSTALMENT PLAN IS POSSIBLE

1.1 The objective framework: what is deferrable and what is not

The sums claimed in the notices of payment are eligible for the instalment plan, with the sole exception of the specific cases that are outlined in detail below.

In fact, the scope of application of the instalment plan, governed by Article 19 of the Decree of the President of the Republic No. 602/1973, includes the sums of the listed taxes from:

- **State Administrations, Agencies established by the State, Independent Administrative Authorities and other Public Social Security Entities;**
- other types of creditor Entities (Municipalities, Regions, etc.), unless they have opted, by notifying the RCA, for a different determination that will take effect from the 30th day following the date of receipt of the communication; a list of the Entities that have opted to manage the instalment of their credits independently is available on the website of the RCA, in the Citizens or Businesses and Professionals sections, under the heading "Instalment Plans".

SUMS OF LISTED TAXES

Sums determined to be due by the taxpayer as a result of the inspections performed by the creditor Entities such as the Italian Revenue Agency, the National Institute for Social Security (*Istituto Nazionale della Previdenza Sociale - INPS*), the Regions and the Municipalities, and which have not been paid (in full or in part) are enrolled in the register and forwarded to the RCA for collection.

The **register is a list** produced by the creditor Entities which is transmitted to the RCA with the names of the debtors, the type of debt to be collected and the relevant sums due.

The term "listed sums" also includes the sums transferred for collection to the RCA and that are included in the enforceable **verification notices issued by the Revenue Agency** (Article 29, paragraph 1, letter a), of Italian Legislative Decree No. 78/2010, converted, with amendments, by Italian Law No. 122/2010), by the **Local Authorities** (Article 1, paragraphs 784 to 813, of Italian Law No. 160/2019) and in the **debit notices** issued by **INPS** (Article 30, paragraph 1, of the same Italian Legislative Decree No. 78/2010).

Conversely, sums that have been transferred for collection by creditor Entities to the Italian Revenue-Collection Agency are **excluded** from the scope of application of the instalment plan scheme:

- a. if the sums are already the **object of a pre-existing instalment plan which has lapsed** due to non-payment of the number of instalment payments scheduled at the relevant time.

This exclusion:

- ✓ is permanently effective in the case of an instalment plan based on applications submitted **on or after July 16 2022**, in which case the debt included in such lapsed instalment schemes is no longer eligible for additional instalment plans;
 - ✓ may be remedied if the debt was included, instead, in a previous instalment plan relating to an application **submitted up to and including July 15 2022**; in this case, the debt may be divided into instalment payments again only if a sum equal to the amount of the instalment payments of the previous instalment plan that had expired at the date of the new application is paid in full and in advance;
- b. if the amounts relate to what are known as "non-deferrable debts", namely debts which, by their very nature or because of the specific nature of the applicable legislation, are not payable by an instalment scheme: for example, breaches of specific customs regulations or the recovery of State aid (a list of the taxes concerned and the types of tax is published on the website of the RCA, in the "Citizens" or "Businesses and Professionals" sections, under the heading "Instalment Plans").
 - c. if the sums are assigned by those Entities that have decided not to delegate to the RCA the power to apply instalment plans for their credits (a list of the Entities that have chosen to manage an instalment scheme of their credits independently is published on the website of the RCA in the "Citizens" or "Businesses and Professionals" sections, under the heading "Instalment Plans");
 - d. if the sums are the object of the subsidised measures known as "**Rottamazione ter**" or "**Saldo e stralcio**" (Articles 3 and 5 of Italian Legislative Decree No. 119/2018 or by Article 1, paragraphs 190 and 193, of Italian Law No. 145/2018 or by Article 16-bis of Italian Legislative Decree No. 34/2019), for which the **ineffectiveness of the same measures** has been established due to the non/insufficient/delayed settlement of one of expiring instalment payments starting from the year 2020.

ATTENTION

Based on the amendments introduced by what is termed the "*DL Aiuti*" (Italian Decree-Law No. 50/2022), **the lapse of the benefit** of the instalment plan of one or more debts **does not preclude** the possibility of requesting and obtaining an instalment plan for **different debts** from the ones already included in the lapsed instalment plan (paragraph 3-ter of Article 19 of the Decree of the President of the Republic No. 602/1973 introduced by Article 15-bis, paragraph 1, of Italian Decree-Law No. 50/2022 converted, with amendments, by Italian Law No. 91/2022).

In addition, Italian Law No. 197/2022, Article 1, paragraphs 231 to 252, **does not preclude** the possibility of requesting an instalment plan applied to the debts for which the so-called "**Rottamazione-quater**" has been requested and accepted and the ineffectiveness of the measure has been determined due to the non-payment of one of the instalment payments of the subsidised plan; this, of course, unless one of the exclusion conditions mentioned in points a., b., c. above applies.

1.2 Prerequisites to have access to an instalment plan

In order to be eligible for the benefit of an instalment plan, the taxpayer must, depending on the case, simply declare or even prove the following at the time of submitting the request:

- the **temporary situation of objective economic difficulty** that prevents the taxpayer from paying the debt in a single payment; this condition allows access to the instalment plan for a maximum of 72 instalment payments (6 years);
- the **proven and severe situation of difficulty linked** to the current economic situation irrespective of the individual responsibility of the taxpayer, if, although the requirements of "temporary status" are applicable, the taxpayer can only bear the financial burden of the instalment payment if the number of the single instalment payments exceeds 72; the existence of this condition entitles the taxpayer to have access to the instalment plan for a maximum number of 120 instalment payments (10 years);
- the proven condition of an increased temporary state of economic difficulty of the taxpayer, if, as a result of certain circumstances, the assets and income conditions of the taxpayer have deteriorated to such an extent as to make it possible to reschedule the instalment plan that had been previously granted.

ATTENTION

The condition of "temporary status" is the essential element supporting the establishment of an instalment plan. In fact, it is **indispensable and crucial that the taxpayer testifies and, in certain cases, demonstrates the ability to pay** the debts, even if payment is under an instalment plan.

On the contrary, this condition does not apply in cases where the economic difficulty is "definitive", as in the case of individuals who have ceased their business activities or who are in the process of being declared bankrupt or put into judicial liquidation, as a result of which they are effectively unable to pay their debts, even under an instalment plan.

In addition, subjects involved in specific bankruptcy procedures, which, even if they do not manifest a situation of irreversible insolvency, require compliance with the principle known as "*par condicio creditorum*", the equal treatment of all creditors, are excluded from access to an instalment plan.

ATTENTION

Companies in liquidation must also always submit, **regardless of** the amount requested in an instalment plan, a report signed by a professional expert (the requirements of which are specified in Article 2, paragraph 1, letter o) of the Company Crisis and Insolvency Code), stating the **reasons** for the inability to pay the debt in a single payment and, alternatively:

- the existence of assets capable of ensuring the equal and full repayment of the creditors of the company and, therefore, the existence of the means necessary to settle the debt and of cash flows sufficient to ensure the regularity of payments;
- or, in the absence of these means, the existence of the availability of third parties to guarantee, prior to the granting of the measure, the settlement in instalment payments in the form of a bank surety bond, surety policy or a first-degree mortgage on assets whose value, calculated under the terms of Article 79 of the Decree of the President of the Republic No. 602/1973, exceeds the amount of the residual debt plus the deferment interest. In the latter case, the deferment measure must in any case be signed for acceptance by the third party guarantor.

In any case, regardless of the amount requested under an instalment plan, the deferment measure **must not exceed 24 months**, unless the report indicates that the complexity of the liquidation of the assets requires a longer period.

2. THE STANDARD INSTALMENT PLAN WITH 72 INSTALMENT PAYMENTS

Taxpayers who are in a temporary situation of objective difficulty have the option to request and obtain a **standard instalment plan of up to 72 monthly instalment payments (6 years)**.

The instalment payments may be of a **constant amount** or, at the request of the taxpayer, of an **increasing** amount from one year to the next.

The minimum instalment payment is equal to EUR 50.

2.1 The standard instalment plan for amounts up to EUR 120,000

If taxpayers want to apply for an instalment plan for debts **up to EUR 120,000**, they must **declare** that they are in temporary and objective economic difficulty. It is not necessary to submit any supporting documentation.

Applications must be submitted with the procedures described in Chapter 6.

2.2 The standard instalment plan for amounts above EUR 120,000

If the debts included in each request for an instalment plan are **above EUR 120,000**, the deferment of payment may be granted if the taxpayer submits **documentation** proving the existence of a temporary situation of objective economic difficulty.

In order to provide evidence of the temporary situation of objective economic difficulty and also to determine the number of instalment payments to be granted (up to a maximum of 72), taxpayers who are **natural persons or individual enterprises** operating under the simplified accounting regime must attach to the application the certification related to the Equivalent Economic Situation Indicator (*Situazione Economica Equivalente* - **ISEE**) of their household.

If, instead, the taxpayer requesting a deferment of payment is a **legal person or an individual enterprise operating under the ordinary accounting regime**, the taxpayer must submit, together with the application, the accounting documentation necessary to verify:

- the existence of the condition of temporary economic difficulty determined by the value of the **Liquidity Index**, extracted from the economic/capital situation of the enterprise, which must be less than 1;

- the number of instalment payments that can be granted (up to a maximum of 72) in relation to the value of the **Alfa Index**, which is calculated as the ratio between the amount of the total debt to be paid in instalments and the value of production (e.g. for limited companies, cooperatives, mutual insurance companies) or the total revenues and income (e.g. for partnerships, sole proprietorships, associations, etc.) multiplied by 100. Specifically, the maximum number of instalment payments that may be granted in relation to the value of the Alfa Index is outlined in the following table:

More than	Up to	Maximum number of instalment payments
0	2	18
2	4	36
4	6	48
6	8	60
8		72

Applications must be submitted with the procedures described in Chapter 6.

ATTENTION

For applications to pay with an instalment plan **submitted after July 16 2022**, the threshold of **EUR 120,000** refers exclusively to the outstanding amount of the debt of **each individual application for an instalment plan**. Previously, the threshold that determined whether or not the condition of temporary economic difficulty had to be documented was also calculated by taking into account the residual amount of any instalment payments already granted to the same individual that was still outstanding.

3. THE EXTRAORDINARY INSTALMENT PLAN WITH 120 INSTALMENT PAYMENTS

Taxpayers who, in addition to a temporary situation of objective difficulty, also have a **proven and severe situation linked to the current economic situation, for reasons beyond their responsibility** and who are therefore unable to sustain the payment of the debt according to an ordinary instalment plan subdivided into 72 monthly instalment payments, are entitled to apply for an **extraordinary instalment plan for a maximum of 120 instalment payments (10 years)**.

The requirements for a serious and proven situation of difficulty are defined by the Decree of the Italian Ministry of Economy and Finance of November 6 2013 [Economic and Financial Documentation - Article Detail \(finanze.it\)](#), which also establishes the maximum number of instalment payments that can be granted based on the current economic situation.

In this case, as stipulated in the Decree described above, the instalment payments are restricted to a constant amount.

Applications must be submitted with the procedures described in Chapter 6.

3.1 Natural persons or individual enterprises operating under the simplified accounting regime

If the taxpayer is a **natural person or an individual enterprise operating under the simplified accounting regime**, the serious and proven situation of difficulty exists if the amount of the instalment payment, based on a schedule of 72 instalment payments, is greater than 20% of the monthly income of the household as indicated by the Income Situation Indicator (*Indicatore della Situazione Reddittuale - ISR*) reported in the **ISEE** form that must be attached to the application.

3.2 Legal persons or individual enterprises operating under the ordinary accounting regime

Instead, if the taxpayer is a **legal person or an individual enterprise operating under the ordinary accounting regime**, the existence of a serious and proven situation of difficulty is determined with the simultaneous presence of two conditions to be indicated in the form, with the requirement to attach the relevant documentation to the request:

- a **Liquidity Index** between 0.50 and less than 1;
- the **value of the instalment payment** as determined in the case of an ordinary plan exceeding 10% of the value of production (or total revenues and income) on a monthly basis.

4. THE EXTENSION OF AN INSTALMENT PLAN

If a taxpayer proves that the situation of objective economic difficulty has increased since the first instalment plan was granted, the Italian Revenue-Collection Agency may grant an **extension of the instalment plan**.

The extension **may be requested only once**, and on condition that the relevant instalment plan for which the extension is requested **has not lapsed**.

The extension may be:

- **standard**, up to a maximum of an additional 72 instalment payments;
- **extraordinary**, up to a maximum of 120 instalment payments if, in addition to the condition of an increased situation of economic difficulty, there is also a proven and severe situation of difficulty linked to adverse current economic conditions.

The maximum number of instalment payments that may be granted for a request for an extended instalment plan is determined by the difference between the number of instalment payments requested and granted (maximum 72 or maximum 120) and the number of instalment payments due and unpaid at the date of acceptance, of the previous instalment plan for which an extension is being requested.

The request for an extension must be submitted using the same forms available for the application for an instalment plan, which are described in Chapter 6.

Taxpayers must indicate the protocol number of the instalment plan for which they request an extension and attach the documents, specified on the form, that prove that **the temporary state of objective economic difficulty has increased**.

5. READMISSION

Exclusively under certain conditions, it is possible to request the rescheduling of **debts** included in a previous instalment plan that **has already lapsed** due to non-payment of the relevant number of instalment payments, as provided for by law from time to time (which is referred to as readmission).

More specifically, this option is only permitted if the lapsed instalment request, which included the debts to be newly deferred with a readmission request, **was submitted before July 16 2022**; in addition, a corresponding **advance settlement** of the amount of the instalment payments of the previous instalment plan that had expired and had not been paid at the date the new request was submitted must be executed.

The new instalment plan may be granted for a maximum number of instalment payments not exceeding the number of instalment payments remaining, at the date of the new application, of the plan for which readmission is requested.

Instead, debts lapsed from instalment plan requests that **were submitted on or after July 16 2022** are no longer eligible for an additional instalment plan.

6. HOW TO APPLY FOR AN INSTALMENT PLAN

Taxpayers - **natural persons, individual enterprises or legal persons** - have a variety of methods available to them for submitting an application for an instalment plan.

The methods **are differentiated based on the amount of debt** that the taxpayer wants to pay with an instalment plan and on the **type** of deferment requested (standard, extraordinary, and extended).

In particular, and with reference to the specific methods described in the following paragraphs, applications may be submitted as follows:

- for the **standard instalment plan for amounts up to EUR 120,000**, by using the "**Instalment Now**" service which is available on the website of the RCA in the reserved area, without the need to attach any identification documents or any other supporting documentation;
by using this service, taxpayers **can obtain the instalment plan directly online**. The "Instalment Now" service can also be used by a **trusted person** or **tax intermediaries** (accountants, labour consultants, trade associations, etc.) specifically delegated by the same taxpayer to perform online all the main collection-related operations on his/her behalf, including the submission of a request for an instalment plan. In such cases, the delegated party is authorised to operate, on behalf of the taxpayer, in the relevant reserved area of the taxpayer;
- for all types of instalment plans regardless of the amount requested, by filling in the appropriate **application form**, attaching an **identification document** and, where applicable, the required **supporting documentation** certifying the conditions for obtaining the deferment of payment, it is necessary to make sure that the following is submitted:
 - ✓ the indication of the **domicile** - physical address, e-mail address or certified electronic mail (Pec) - that the Italian Revenue-Collection Agency has to use in order to send the notifications related to the instalment plan and the relevant payment slips;
 - ✓ the completed "**proxy**" section of the form if a taxpayer delegates another individual to submit the application on his/her behalf; in this case, also attach a copy of the identity document of the delegated individual.

6.1 The standard instalment plan for amounts up to EUR 120,000

The Italian Revenue-Collection Agency provides several channels to submit an application for standard instalment plans up to EUR 120,000. In particular, the request must be submitted:

- with the "**Instalment Now**" service, available in the reserved area of the website of the Italian Revenue-Collection Agency or from the Equiclick app. Citizens have the possibility of accessing the reserved area with their public digital identity system (*Sistema Pubblico di Identità Digitale* - **SPID**), an Italian electronic identity card

(*Carta di Identità Elettronica - CIE*), or the National Services Card (*Carta Nazionale dei Servizi*); tax intermediaries and enterprises can also use their specific Italian Revenue Agency (Entratel) credentials;

- by forwarding [form R1](#), duly completed and signed, to the PEC certified e-mail address indicated on the form itself, relating to the Province of issue of the notice of payment/debit notice for which an instalment plan is requested;

6.2 The standard instalment plan for amounts above EUR 120,000

The standard instalment plan for amounts above EUR 120,000 must be requested by completing [form R2](#) (natural persons or individual enterprises operating under the simplified accounting regime) or [form R3](#) (legal persons or individual enterprises operating under the ordinary accounting regime) and by attaching documentation proving the situation of temporary economic difficulty.

The form and the supporting documentation must be:

- submitted to the **PEC certified e-mail address** indicated on the form, related to the Region of issue of the notice of payment/debit notice for which the instalment plan is requested;
- presented to the **service desks** of the Italian Revenue-Collection Agency.

6.3 The extraordinary instalment plan

The extraordinary instalment plan must be requested, regardless of the amount of the debt, by completing [form R4](#) (natural persons or individual enterprises operating under the simplified accounting regime) or [form R5](#) (legal persons or individual enterprises operating under the ordinary accounting regime) and by attaching the attaching documentation confirming **the proven and severe situation related to the current economic situation**.

The form and the supporting documentation must be:

- submitted to the **PEC certified e-mail address** indicated on the form, related to the Region of issue of the notice of payment/debit notice for which the instalment plan is requested;
- presented to the **service desks** of the Italian Revenue-Collection Agency.

6.4 The deferral of a standard or extraordinary instalment plan

The deferral of a standard instalment plan for sums up to EUR 120,000 is requested by:

- submitting [form R1](#) to the **PEC certified e-mail address** indicated on the form, relative to the Province of notice of payment/debit notice for which the taxpayer is requesting a deferral of the instalment plan, indicating the references of the relevant instalment plan for which the deferral is requested and attaching the

documentation proving that the condition of temporary economic difficulty has increased;

The **deferral of a standard instalment plan for sums above EUR 120,000** must be requested by completing [form R2](#) (natural persons or individual enterprises operating under the simplified accounting regime) or [form R3](#) (legal persons or individual enterprises operating under the ordinary accounting regime).

The relevant form and supporting documentation, proving the condition of **increased temporary economic difficulty**, must be:

- submitted to the **PEC certified e-mail address** indicated on the form, related to the Region of issue of the notice of payment/debit notice for which the taxpayer is requesting an instalment plan, including the references of the instalment plan for which the deferral is being requested;
- presented to the **service desks** of the Italian Revenue-Collection Agency.

The deferral of an extraordinary instalment plan, regardless of the amount of the debt, must be requested by completing [form R4](#) (natural persons or individual enterprises operating under the simplified accounting regime) or by completing [form R5](#) (legal persons or individual enterprises operating under the ordinary accounting regime) and attaching the documentation proving that the condition of economic difficulty has increased, and also, if the extraordinary deferral is requested for an instalment plan that had previously been granted for up to 72 instalment payments, documentation in support of the existence of a severe condition of difficulty linked to the current economic situation;

The form and the supporting documentation must be:

- submitted to the **PEC certified e-mail address** indicated on the form, related to the Region of issue of the notice of payment/debit notice for which the instalment plan is requested;
- presented to the **service desks** of the Italian Revenue-Collection Agency.

7. WHAT HAPPENS AFTER SUBMITTING AN APPLICATION FOR AN INSTALMENT PLAN

7.1 The effects of submitting an application

Submitting an application for an instalment plan has several effects on the debt that is the subject of the application. More specifically:

- The Italian Revenue-Collection Agency **cannot launch any new precautionary procedures** (e.g. administrative blocks on motor vehicles or motorbikes, mortgages on real estate) or **executive procedures** (e.g. distraints), with the following exceptions:
 - ✓ distraints on credits that are the object of default notifications issued in compliance with Article 48-bis of the Decree of the President of the Republic No. 602/1973: in this case, any instalment plan is **granted only net of the amounts for which the notification was served**;
 - ✓ interventions of the Italian Revenue-Collection Agency in a real estate procedure promoted by other entities;
 - ✓ any precautionary procedures subject to a previous agreement with the taxpayer;
- any **precautionary actions** that have already been registered/transcribed are maintained;
- ongoing **executive actions** are continued;
- conservative actions such as **revocation measures** (which render ineffective the acts of disposition of assets carried out by the debtor) are maintained or may be initiated in order to allow the Italian Revenue-Collection Agency to safeguard the guarantees on the assets of the debtor;
- all the measures in **real estate proceedings promoted by third parties** (for example, the auction sale of a property promoted by other entities) remain effective.

7.2 Notification of total and partial acceptance or refusal

When a taxpayer submits an application for an instalment plan, the Italian Revenue-Collection Agency **initiates an administrative procedure** (Italian Law No. 241/1990) which is concluded with an express measure (acceptance or, if there are grounds against the deferment of payment, a justified measure of refusal).

Upon receipt of the application, the RCA issues or delivers to the taxpayer the specific "**Notice of Initiation of Proceedings**". This notification is not sent if the procedure is completed directly and immediately after its initiation with the issuance of the acceptance measure (for example, at the service desk, or by accessing the reserved area of the website of the RCA or of the Equiclick app with the direct release of the acceptance plan).

The administrative procedure is concluded with the following results:

- **a measure of total acceptance**, if the request for an instalment plan is accepted with the granting of a deferment payment scheme for the entire amount of the debt divided into instalment payments and for the same number of instalment payments requested by the taxpayer;
- **a measure of partial acceptance**, if the request for an instalment plan is accepted with the granting of a deferment payment plan only for a portion of the debt requested for an instalment plan (for example, if there are also charges excluded from the scope of application of the institution of the instalment plan in compliance with Article 19 of the Decree of the President of the Republic No. 602/1973) or for a number of instalment payments that is lower than the number requested;
- **a measure of refusal**: this is preceded by a notice of rejection (in order to give the taxpayer the opportunity to regularise the position and/or rectify any elements preventing the grant; in this case, the taxpayer has 10 days to respond) if the conditions for granting the instalment plan are not met at the time of the first assessment. More specifically, in cases in which:
 - ✓ the application for an instalment plan **is not supported**, where necessary, by **documentation** proving the temporary state of economic difficulty or the fact that the state of temporary economic difficulty has increased;
 - ✓ the assessment proves that the **prerequisites for access to the deferment of payment instrument are not present** (for example, the request for an instalment plan is related only to non-deferrable charges);
 - ✓ the indicators resulting from the **assessment of the documents** submitted do not permit the requested instalment plan or there are elements that prevent the granting of the deferment of a payment scheme (for example, the deletion of the business entity under assessment from the National Register of Enterprises (*Registro delle Imprese*) or the existence of bankruptcy proceedings).

If there are no reasons preventing the acceptance of an application, the Italian Revenue-Collection Agency sends the measure of acceptance to the special domicile specifically selected by the taxpayer at the time of the presentation of the request (registered letter with acknowledgement of receipt, PEC certified e-mail, or e-mail) or delivery (to the taxpayer or to the person specifically authorised to collect documents on behalf of the taxpayer); the measure of acceptance is supported by other documents attached, namely the repayment plan, with the breakdown of the debt into the number of instalment payments granted, the amount and the relevant due dates, as well as the relevant pagoPA payment forms for the payment of the first 12 instalment payments.

Subsequent payment forms are sent by the Italian Revenue-Collection Agency to the domicile specified by the taxpayer in the relevant instalment plan application; these forms can also be requested through the "**Instalment Plan-Request Payment Forms**" service which is available in the public area of the website of the Italian Revenue-Collection Agency by entering the tax code, an e-mail address and the number and

date of the measure granting the instalment plan. Alternatively, these forms can be downloaded from the reserved area of the portal (in the "**Paying a Debt by Instalments-Instalment Plans**" section); the forms are also available at the RCA service desks.

7.3 The effects following the approval of an application

The effects that follow the grant of the acceptance measure are the same as the effects already described in relation to the presentation of the application referred to in paragraph 7.1.

The **only exception** is represented by the fact that the acceptance of the application for an instalment plan **removes the state of default referred to in Article 48-bis of the Decree of the President of the Republic No. 602/1973**, for the purposes of **subsequent enquiries or requests** by the Public Administration.

In addition, with the acceptance of the application for an instalment plan, the taxpayer is entitled to receive a certificate of correct payment of social security contributions (*Documento Unico di Regolarità Contributiva - DURC*), if there are no other social security debts that have not been paid in instalments and are overdue.

8. PAYMENT

8.1 Instalment payments: how the amount is structured

The instalment payments of an instalment plan, the amount of which may not, as a rule, be less than EUR 50, are formed by:

- the residual portion of the charge assigned for collection (**tax, penalty, and interest**);
- any **interest on arrears** accrued at the date of submission of the application;
- the so-called "**aggio**" surcharge on collection, which is only applicable to the charges assigned for collection up to December 31 2021 and which is calculated, in compliance with the percentages provided for by law, on the sums referred to in the preceding points;
- **instalment interest**, at the rate currently applicable calculated at the date of definition of the plan (currently 4.5% for tax collection registers and 9,65% for social security registers);
- **fees/charges for the notification** of documents included in the instalment plan (charged in full on the first instalment payment of the relevant plan);
- **the costs of any enforcement/cautionary measures** already undertaken (also charged in full to the first instalment payment of the plan).

If a payment is made after the due date of the scheduled instalment payment date, the following expenses are also charged:

- **default interest** calculated for the time elapsed between the due date of the instalment and the effective date of payment;
- only for the charges assigned for collection up to December 31 2021, **possible additional pro-rated "aggio" surcharge** calculated at the full rate

ATTENTION

The 2022 Budget Law (Italian Law No. 234/2021) provides for the **abolition** of the **collection charges** (the so-called "**aggio**" surcharge) for the amounts assigned to the Tax Collection Agent as of January 1 2022.

8.2 How to settle instalment payments

Amortisation plans always provide that the due date of the first instalment payment is scheduled not earlier than 8 working days from the date of issue of the order granting the deferment, in order to give the taxpayer the necessary time to make the payments.

The settlement of the instalment payments is performed:

- in the **reserved area of the website of the RCA or on the app**, using the reference information on the pagoPA payment forms;
- using the pagoPA payment forms at all **Payment Service Providers participating in the pagoPA network** (Post Offices, Banks, Tobacconists, the SISAL circuit, Lottomatica - the full list is published at www.pagopa.gov.it);
- by **direct debit to the relevant account (Sepa Direct Debit - SDD)**. In this case, the taxpayer must inform the Italian Revenue-Collection Agency of the debit account by using the service "**Activate/Revoke an SDD Mandate for Instalment Plans**", which is available in the section "**Paying the Debt by Instalments**" in the reserved area for Citizens and in the reserved area for Businesses of our website, or by filling in the corresponding form available at our service counters. The first instalment payment that is charged is the one that is due 30 days from the date of delivery of the order; at the same time, any instalment payments that have fallen due in the past and have not been paid are also charged - with interest on arrears;
- at the **service desks** of the Italian Revenue-Collection Agency.

At the service desks of the Italian Revenue-Collection Agency, it is also possible to settle the instalment payments by **offsetting** them against any tax credits referred to in Article 28-ter of the Decree of the President of the Republic No. 602/1973 if the debts included in the offsetting proposal sent to the taxpayer have been regularised in the meantime and there are no additional overdue amounts or by offsetting against non-prescribed, specific, liquid and collectable credits that are specified in Article 28-quarter of the Decree of the President of the Republic No. 602/1973, accrued against public administrations, **within the limits prescribed by the same Article**.

An instalment plan may also be **repaid before the final instalment date**, with full payment of the outstanding debt, at the service desks of the Collection Agent. In this case, the amount to be paid is calculated without taking into account the interest on the instalment amounts due after the instalment payment due in the month following the request for advance repayment.

Early repayment may also be **limited to one or a few notices of payment** included in the relevant plan. In this case, once the partial payment has been made, the Italian Revenue-Collection Agency elaborates a new plan, which reports the same submission date as the previous plan and the same number of remaining instalment payments, the first of which expires on the date of the first unpaid instalment of the previous plan.

8.3 The effects of settling the first instalment payment

The **settlement of the first instalment payment** of a repayment scheme determines a series of effects on the debt included in the instalment plan and on any related procedures.

Specifically:

- The RCA **suspends any administrative blocks** previously ordered on any registered movable property, for example, a motor vehicle provided that all the debts subject to an administrative block have been included in the deferment application. With the suspension of an administrative block, the taxpayer can therefore use the relevant motor vehicle, but cannot have it disposed of or sold. The administrative block is **cancelled** by the Italian Revenue-Collection Agency after the payment of the **full amount** of the deferred debt associated with the administrative block. Suspensions and cancellations are transmitted online by the RCA to the Italian Vehicle Registration Authority (*Pubblico Registro Automobilistico* - **PRA**);
- pending enforcement proceedings (distrainments) are considered **terminated, under the condition** that a successful auction has not yet been successfully completed or an application for assignment has not been filed, or the third party has not made a positive declaration or an assignment order has not already been issued for the distrained credits.

Conversely, the **settlement** of the first instalment payment **has no effect** on any **proceedings** of a conservative nature that **have already been initiated** (for example, **revocation measures**) or on **interventions** that have already been **executed** for real estate proceedings brought by third parties.

In addition, with regard to the procedures described above, the Revenue-Collection Agency may, also after the settlement of the first instalment payment, initiate new **revocation measures** or, in the case of real estate procedures promoted by third parties, it may undertake new measures.

Lastly, once the instalment payments have been settled and the amount of the debt has consequently been reduced, taxpayers have the option, at their own expense and subject to specific conditions, of requesting the **reduction** (the decrease of the amount guaranteed by the mortgage) or **restriction** (partial release of one or more of the mortgaged properties) of any mortgage registered in compliance with Article 77 of the Decree of the President of the Republic No. 602/1973 dated before the submission of the request.

9. SUSPENSION

If a judicial or administrative suspension, even partial, of the debt occurs during the period of an instalment plan, it is possible to **interrupt the relative instalment payments limited to the suspended amounts**.

In this case, the taxpayer is entitled to make an appointment at the [online](#) or [territorial](#) service counter to recalculate the instalments net of the suspended amounts.

At the end of the suspension period and before the possible lapse of the instalment scheme, in which instalment payments due during the suspension period are not counted, the taxpayer has the right to request payment of the remaining debt in the same number of unpaid instalment payments as in the original plan; alternatively, the taxpayer has the option of requesting a different number of instalment payments, not exceeding a total number of 72.

10. LAPSE

A taxpayer lapses the benefits of an instalment plan for **default** if the taxpayer fails to pay a number of instalment payments, **including non-consecutive** instalment payments. The number of unpaid instalment payments triggering the lapse varies, according to the regulatory measures that have been enacted in this regard, in relation to several elements, as summarised in the table below:

INSTALMENT PLAN	LAPSE
For instalment plans existing on March 8 2020 (February 21 for citizens residing in the former COVID "red zone")	18 instalment payments , including non-consecutive
For instalment plans granted after March 8 2020 and applied for by December 31 2021	10 instalment payments , including non-consecutive
For instalment plans submitted from January 1 2022 to July 15 2022	5 instalment payments , including non-consecutive
For instalment plans submitted from July 16 2022	8 instalment payments , including non-consecutive

If the last instalment is included in the unpaid instalments, the lapse is effective even if the number of unpaid instalments is less than the number of instalments scheduled.

If a lapse is effected, the debt is due for payment in one single instalment and collection measures may be undertaken with immediate effect.

If a lapse is the result of a default, a new instalment extension may be requested only after payment of an amount equal to the amount of the lapsed instalments at the time of the new request; this option applies to debts included in instalment plans submitted until July 15 2022. Instead, for applications for instalment plans submitted after July 16 2022, it is not possible to be granted a new instalment plan for the same debts if they have lapsed.

The lapse of one or more instalment plans does not preclude further instalment requests for debts not included in the lapsed instalment plans.

11. ADDITIONAL INFORMATION

[Decree of the President of the Republic No. 602/1973](#) (*Provisions on Income Tax Collection*) – Article 19, Article 21, Article 28 ter, Article 28 quater, Article 30, Article 48 bis, Article 77, Article 79, Article 86

[Italian Law No. 241/1990](#) (*New rules governing administrative procedures and the right of access to administrative documents*)

[Italian Legislative Decree No. 46/1999](#) (*Reorganisation of the provisions regulating collection using a register, in compliance with Article 1 of Italian Law No. 337 of September 28 1998*) - Article 26

[Decree of the Italian Ministry of Economy and Finance of November 6 2013](#) – (*Extraordinary instalment plan of the sums enrolled on a register, in compliance with Article 52, paragraph 3, of Italian Legislative Decree No. 69 of 2013, converted, with amendments, by Italian Law No. 98 of 2013*)

[Italian Legislative Decree No. 119/2018](#) (*Urgent provisions in the field of taxation and finance*) - Articles 3 and 5

[Italian Law No. 145/2018](#) (*State budget for the financial year 2019 and multiannual budget for the three-year period 2019-2021*) - Article 1, paragraphs 190 and 193

[Italian Legislative Decree No. 14/2019](#) (*Business Crisis and Insolvency Code in implementation of Italian Law No. 155 of October 19 2017*) – Article 2, paragraph 1, letter o)

[Italian Legislative Decree No. 34/2019](#) (*Urgent measures for economic growth and the resolution of specific situations of crisis*) - Article 16 bis

[Italian Legislative Decree No. 137/2020](#) (*the "Ristori" Decree - Additional urgent measures for health protection, support of workers and enterprises, justice and security, related to the epidemiological emergency caused by Covid-19*) - Article 13 decies, paragraph 1, letter b)

[Italian Law No. 234/2021](#) (*the 2023 Budget Law*), Article 1, paragraphs 15 to 19

[Italian Legislative Decree No. 50/2022](#) (*Urgent measures in the field of national energy policies, business productivity and investment attraction, and in the area of social policies and the Ukrainian crisis*) - Article 15 bis, paragraph 1

[Italian Law No. 197/2022](#) (*the 2023 Budget Law*) - Article 1, paragraphs 231 to 252

[INPS Circular No. 89 of September 16 2024](#) (*Variation in the amount of the interest applied to deferred and extended payments and of the additional amounts for non-payment or late payment of social security and welfare contributions*)

The regulatory and procedural documents listed are accessible through the service maintained by [CERDEF](#) (Centre for Economic and Financial Research and Documentation) on the website of the Italian Department of Finance

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