



General Assembly

January Session, 2025

***Raised Bill No. 1558***

LCO No. 7060



Referred to Committee on FINANCE, REVENUE AND  
BONDING

Introduced by:  
(FIN)

***AN ACT CONCERNING INCOME TAXES IMPOSED BY OTHER  
JURISDICTIONS ON RESIDENTS OF THE STATE.***

Be it enacted by the Senate and House of Representatives in General  
Assembly convened:

1 Section 1. Subsection (a) of section 12-704 of the general statutes is  
2 repealed and the following is substituted in lieu thereof (*Effective January*  
3 *1, 2026, and applicable to taxable years commencing on or after January 1,*  
4 *2026*):

5 (a) (1) Any resident or part-year resident of this state shall be allowed  
6 a credit, subject to the provisions of subdivision (6) of this subsection,  
7 against the tax otherwise due under this chapter in the amount of any  
8 income tax imposed on such resident or part-year resident for the  
9 taxable year by another state of the United States or a political  
10 subdivision thereof or the District of Columbia on income derived from  
11 sources therein and [which] that is also subject to tax under this chapter.

12 (2) In the case of a resident, the credit provided under this section  
13 shall not exceed the proportion of the tax otherwise due under this  
14 chapter that the amount of the taxpayer's Connecticut adjusted gross

15 income derived from or connected with sources in the other taxing  
16 jurisdiction bears to such taxpayer's Connecticut adjusted gross income  
17 under this chapter. The provisions of this section shall also apply to  
18 resident trusts and estates and, wherever reference is made in this  
19 section to residents of this state, such reference shall be construed to  
20 include resident trusts and estates.

21 (3) In the case of a part-year resident, the credit provided under this  
22 section shall not exceed the proportion of the tax otherwise due during  
23 the period of residency under this chapter that the amount of the  
24 taxpayer's Connecticut adjusted gross income derived from or  
25 connected with sources in the other jurisdiction during the period of  
26 residency bears to such taxpayer's Connecticut adjusted gross income  
27 during the period of residency under this chapter. The provisions of this  
28 section shall also apply to part-year resident trusts and, wherever  
29 reference is made in this section to part-year residents of this state, such  
30 reference shall be construed to include part-year resident trusts.

31 (4) The allowance of the credit provided under this section shall not  
32 reduce the tax otherwise due under this chapter to an amount less than  
33 what would have been due if the income subject to taxation by such  
34 other jurisdiction were excluded from Connecticut adjusted gross  
35 income.

36 (5) For purposes of this subsection, a tax on wages that is paid to  
37 another state of the United States or a political subdivision thereof or the  
38 District of Columbia by an employer on behalf of an employee and for  
39 which a credit is allowed by such other jurisdiction shall be considered  
40 an income tax and a comparable credit may be claimed by the resident  
41 or part-year resident, subject to the limitations set forth in this  
42 subsection, in the form and manner prescribed by the commissioner.

43 (6) Notwithstanding the provisions of subdivisions (2) and (3) of this  
44 subsection, the portion of the amount of any credit allowed pursuant to  
45 this section that is attributable to income derived from services rendered

46 while such resident or part-year resident was within this state shall be  
47 multiplied by ninety-nine-hundredths per cent.

48       Sec. 2. (*Effective from passage*) The Attorney General shall study  
49 specific steps the office of the Attorney General may take to defend  
50 residents of this state from having taxes imposed by another state of the  
51 United States or a political subdivision thereof or the District of  
52 Columbia on income derived from services rendered while such  
53 resident was within this state. Not later than January 1, 2026, the  
54 Attorney General shall submit a report, in accordance with the  
55 provisions of section 11-4a of the general statutes, of the findings of such  
56 study and any recommendations of said office to the joint standing  
57 committee of the General Assembly having cognizance of matters  
58 relating to finance, revenue and bonding.

59       Sec. 3. (NEW) (*Effective from passage*) For taxable years commencing  
60 on or after January 1, 2020:

61       (1) A resident of this state who satisfies the provisions of  
62 subparagraphs (A) to (D), inclusive, of this subdivision shall be allowed  
63 a credit against the tax otherwise due for the applicable taxable year  
64 under chapter 229 of the general statutes, other than the liability  
65 imposed by section 12-707 of the general statutes, in an amount equal to  
66 fifty per cent of the amount of taxes owed to this state as a result of the  
67 readjustment of the credit for taxes paid to another state of the United  
68 States or a political subdivision thereof or the District of Columbia,  
69 pursuant to section 12-704 of the general statutes, as amended by this  
70 act. To be eligible for the credit under this section, such resident shall  
71 have:

72       (A) Paid any income tax or wage tax imposed for the taxable year by  
73 another state of the United States or a political subdivision thereof or the  
74 District of Columbia;

75       (B) Applied for and been denied a refund from such other jurisdiction  
76 for taxes paid to such other jurisdiction on income derived from services

77 rendered while such resident was within this state;

78 (C) Filed an appeal with a court or tribunal through which such  
79 resident formally protested such denial; and

80 (D) Obtained a final decision that resulted in such resident being  
81 refunded taxes paid to such other jurisdiction on income derived from  
82 services rendered while such resident was within this state.

83 (2) No penalty or interest shall be imposed on any late payment of  
84 the tax due under chapter 229 of the general statutes, other than the  
85 liability imposed by section 12-707 of the general statutes, if (A) such  
86 late payment is attributable to a reduction in the credit for taxes paid  
87 under section 12-704 of the general statutes, as amended by this act, (B)  
88 such reduction in the credit for taxes paid is the direct result of a refund  
89 that a resident of this state received from another state of the United  
90 States or a political subdivision thereof or the District of Columbia, (C)  
91 such refund relates to income derived from services rendered while  
92 such resident was not within such other jurisdiction, and (D) such other  
93 jurisdiction requires employee income to be sourced to an employer's  
94 location if a nonresident renders services from an out-of-state location.

This act shall take effect as follows and shall amend the following sections:		
Section 1	<i>January 1, 2026, and applicable to taxable years commencing on or after January 1, 2026</i>	12-704(a)
Sec. 2	<i>from passage</i>	New section
Sec. 3	<i>from passage</i>	New section

**Statement of Purpose:**

To (1) reduce a portion of the amount of the credit for income taxes paid to other states, (2) require the Attorney General to study ways to defend residents from having income tax imposed by other jurisdictions on income derived from services rendered while such resident was within

this state, and (3) provide a credit to residents who file an appeal protesting the tax imposed by such other jurisdiction.

***[Proposed deletions are enclosed in brackets. Proposed additions are indicated by underline, except that when the entire text of a bill or resolution or a section of a bill or resolution is new, it is not underlined.]***