

Time limit for completion of assessment, reassessment, recomputation

New Income Tax Act Vs. Old Act

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Income Tax Act, 1961		Income tax Act, 2025		
Section		Section		Remarks
Section 158BE	Time-limit for completion of block assessment.	296	Time-limit for completion of block assessment	
158BE (1)	Notwithstanding the provisions of section 153, the order under section 158BC shall be passed within twelve months from the end of the quarter in which the last of the authorisations for search under section 132, or requisition under section 132A, was executed or made, as the case may be:	296(1)(a)	Irrespective of the provisions of section 286 , the order under section 294 shall be passed within twelve months from the end of the quarter in which the last of the authorisations for search was executed, or requisition was made.	New Section only valid for searched conducted before 31.03.2026 Finance Bill brought amendment for searches conducted on and after 01.04.2026
		296(1)	(1) Irrespective of the provisions of section 286, the order under section 294 shall be passed <u>within eighteen months from the end of the quarter in which the search was initiated or requisition was made.</u>	Amendment as per new Finance Bill, 2026
	Provided that in a case where search under section 132 was initiated, or requisition under section 132A was made, and during the course	296(2)	Where search was initiated or requisition was made, and during the course of assessment or reassessment of the total undisclosed income of	

	of the proceedings for the assessment or reassessment of the total undisclosed income of the relevant block period, any reference under sub-section (1) of section 92CA is made, the period available for making an order of assessment or reassessment in respect of the block period shall be extended by twelve months.		the relevant block period, any reference under section 166(1) is made, the period available for completion of such assessment or reassessment proceeding shall be extended by twelve months.	
	Provided further that in a case where in pursuance to fifth proviso to clause (a) of sub-section (1) of section 158BC, the time allowed under the said clause for furnishing return is extended by a further period of thirty days, the provisions of this sub-section shall have effect, as if for the words “twelve months”, the words “thirteen months” had been substituted.	296(1)(b)	Where in pursuance to section 294(1)(a)(v) , the time allowed under the said section for furnishing return is extended by a further period of thirty days, the provisions of sub-section (1) and (5) shall have effect, as if for the words “twelve months”, the words “thirteen months” had been substituted.	
158BE (2)	In computing the period of limitation under sub-section (1), the period (not exceeding one hundred and eighty days) commencing from the date on which a search is initiated under section 132 or a requisition is made under section 132A and ending on the date on which the books of account, or other documents or money or bullion	296(3)	In computing the period of limitation under sub-section (1), the period (not exceeding one hundred and eighty days) commencing from the date on which a search is initiated or a requisition is made and ending on the date on which assets as provided in section 261(b) and material seized or requisitioned as provided in section 261(i) are	

	or jewellery or other valuable article or thing seized under section 132 or requisitioned under section 132A, as the case may be, are handed over to the Assessing Officer having jurisdiction over the assessee, in whose case such search is initiated under section 132 or such requisition is made under section 132A, as the case may be, shall be excluded:		handed over to the Assessing Officer having jurisdiction over the assessee shall be excluded.	
	Provided that where after exclusion of the period referred to in this sub-section, the period of limitation for making an order of assessment or reassessment, as the case may be, expires before the end of a month, such period shall be extended to the end of such month.	296(4)	If after exclusion of the period referred to in sub-section (3), the remaining period of limitation for completion of assessment or reassessment, expires before the end of a month, such period shall be extended to end of such month.	
158BE(3)	The period of limitation for completion of assessment or reassessment for the block period in the case of the other person referred to in section 158BD shall be twelve months from the end of the quarter in which the notice under section 158BC in pursuance of section 158BD, was issued to such other person:	296(5)	The period of limitation for completion of assessment or reassessment for the block period in the case of the other person referred to in section 295 shall be twelve months from the end of the quarter in which the notice under section 294 in pursuance of section 295 , was issued to such other person.	

	Provided that in case where during the course of the proceedings for the assessment of undisclosed income of the block period in case of other person referred to in section 158BD, a reference under sub-section (1) of section 92CA is made, the period available for making an order of assessment in respect of the block period in case of such other person shall be extended by twelve months.	296(6)	The period available for completion of assessment or reassessment proceeding in respect of the block period in a case referred to in sub-section (5) shall be extended by twelve months, where a reference under section 166(1) is made in such case.	
	Provided further that in a case where in pursuance to fifth proviso to clause (a) of sub-section (1) of section 158BC, the time allowed under the said clause for furnishing return is extended by a further period of thirty days, the provisions of this sub-section shall have effect, as if for the words “twelve months”, the words “thirteen months” had been substituted	296(3)	In computing the period of limitation under sub-section (1), the period (not exceeding one hundred and eighty days) commencing from the date on which a search is initiated or a requisition is made and ending on the date on which assets as provided in section 261(b) and material seized or requisitioned as provided in section 261(i) are handed over to the Assessing Officer having jurisdiction over the assessee shall be excluded.	
Section 158BE(4)	In computing the period of limitation under this section, the following period shall be excluded,—	296(7)	In computing the period of limitation under this section, the following period shall be excluded,—	

158BE(4)(i)	the period commencing on the date on which stay on assessment proceedings was granted by an order or injunction of any court and ending on the date on which certified copy of the order vacating the stay was received by the jurisdictional Principal Commissioner or Commissioner; or	296(7)(a)	the period commencing on the date on which stay on assessment proceeding was granted by an order or injunction of any court and ending on the date on which certified copy of the order vacating the stay was received by jurisdictional Principal Commissioner or Commissioner; or	
158BE(4)(ii)	the period commencing from the date on which a reference or first of the references for exchange of information is made by an authority competent under an agreement referred to in section 90 or section 90A and ending with the date on which the information requested is last received by the Principal Commissioner or Commissioner or a period of one year, whichever is less; or	296(7)(b)	the period commencing from the date on which a first of the reference for exchange of information (made by an authority competent under an agreement referred to in section 159) is made and ending with the date on which such information requested is last received by the jurisdictional Principal Commissioner or Commissioner or one year, whichever is less; or	
158BE(4)(iii)	the time taken in reopening the whole or any part of the proceeding or giving an opportunity to the assessee to be re-heard under the proviso to section 129; or	296(7)(c)	the time taken in reopening the whole or any part of the proceeding or giving an opportunity to the assessee to be re-heard under section 244(2) ; or	
158BE(4)(iv)	the period commencing from the date on which the Assessing Officer directs the assessee to get	296(7)(d)	the period commencing from the date on which the Assessing Officer directs the assessee to get	

	<p>his accounts audited or inventory valued under sub-section (2A) of section 142 and—</p> <p>(a) ending with the last date on which the assessee is required to furnish a report of such audit or inventory valuation under that sub-section; or</p> <p>(b) where such direction is challenged before a court, ending with the date on which the order setting aside such direction is received by the Principal Commissioner or Commissioner; or</p>		<p>his accounts audited or inventory valued under section 268(5), and—</p> <p>(i) ending with the last date on which the assessee is required to furnish a report of such audit or inventory valuation under that sub-section; or</p> <p>(ii) where such direction is challenged before a court, ending with the date on which the certified copy of the order setting aside such direction is received by the jurisdictional Principal Commissioner or Commissioner; or</p>	
158BE(4)(v)	<p>the period commencing from the date on which the Assessing Officer makes a reference to the Valuation Officer under sub-section (1) of section 142A and ending with the date on which the report of the Valuation Officer is received by the Assessing Officer; or</p>	296(7)(e)	<p>the period commencing from the date on which the Assessing Officer makes a reference to the Valuation Officer under section 269(1) and ending with the date on which the report of the Valuation Officer is received by the Assessing Officer; or</p>	
158BE(4)(vi)	<p>the period commencing from the date on which the Assessing Officer intimates the Central Government or the prescribed authority, the</p>	296(7)(f)	<p>the period commencing from the date on which the Assessing Officer intimates the Central Government or the prescribed authority, the</p>	

	contravention of the provisions of clause (21) or clause (22B) or clause (23A) or clause (23B) of section 10, under sub-clause (i) of the first proviso to sub-section (3) of section 143 and ending with the date on which the copy of the order withdrawing the approval or rescinding the notification, as the case may be, under those clauses is received by the Assessing Officer; or		contravention of the provisions of Schedule III (Table: Sl. No. 23, 24 or 25) as referred to in section 270(11)(i) and ending with the date on which the copy of the order withdrawing the approval or rescinding the notification, under those clauses is received by the Assessing Officer; or	
158BE(4)(vii)	the period commencing from the date on which the Assessing Officer makes a reference to the Principal Commissioner or Commissioner under the second proviso to sub-section (3) of section 143 and ending with the date on which the copy of the order under clause (ii) or clause (iii) of the fifteenth proviso to clause (23C) of section 10 or clause (ii) or clause (iii) of sub-section (4) of section 12AB, as the case may be, is received by the Assessing Officer; or	296(7)(g)	the period commencing from the date on which the Assessing Officer makes a reference to the Principal Commissioner or Commissioner as per section 270(13) and ending with the date on which the copy of the order under section 351(2)(ii)(A) or (B) , is received by the Assessing Officer; or	
158BE(4)(viii)	the period commencing from the date on which a reference for declaration of an arrangement to be an impermissible avoidance arrangement is received by the Principal Commissioner or	296(7)(h)	the period commencing from the date on which a reference for declaration of an arrangement to be an impermissible avoidance arrangement is received by the jurisdictional Principal	

	Commissioner under sub-section (1) of section 144BA and ending on the date on which a direction under sub-section (3) or sub-section (6) or an order under sub-section (5) of the said section is received by the Assessing Officer; or		Commissioner or Commissioner under section 274(1) and ending on the date on which a direction under sub-section (3) or (6) or an order under sub-section (5) of the said section is received by the Assessing Officer; or	
158BE(4)(ix)	the period commencing from the date on which an application is made before the Authority for Advance Rulings or before the Board for Advance Rulings under sub-section (1) of section 245Q and ending with the date on which the order rejecting the application is received by the Principal Commissioner or Commissioner under sub-section (3) of section 245R; or	296(7)(i)	the period commencing from the date on which an application is made before the Board for Advance Rulings under section 383(1) and ending with the date on which the order rejecting the application is received by the jurisdictional Principal Commissioner or Commissioner under section 384(5) ; or	
158BE(4)(x)	the period commencing from the date on which an application is made before the Authority for Advance Rulings or before the Board for Advance Rulings under sub-section (1) of section 245Q and ending with the date on which the advance ruling pronounced by it is received by the Principal Commissioner or Commissioner under sub-section (7) of section 245R:	296(7)(j)	the period commencing from the date on which an application is made before the Board for Advance Rulings under section 383(1) and ending with the date on which the advance ruling pronounced by it is received by the jurisdictional Principal Commissioner or Commissioner under section 384(8) .	

	<p>Provided that where immediately after the exclusion of the aforesaid period, the period of limitation referred to in sub-section (1) or sub-section (3) available to the Assessing Officer for making an order under clause (c) of sub-section (1) of section 158BC is less than sixty days, such remaining period shall be extended to sixty days and the aforesaid period of limitation shall be deemed to be extended accordingly:</p>	<p>296(8)</p>	<p>Where immediately after the exclusion of the period referred to in sub-section (3) or (7), the remaining period of limitation referred to in sub-section (1) or (5) available to the Assessing Officer for completion of assessment under section 294 is less than sixty days, such remaining period shall be extended to sixty days and the aforesaid period of limitation shall be deemed to be extended accordingly.</p>	
	<p>Provided further that where after extension of the period referred to in the first proviso, the period of limitation for making an order of assessment or reassessment, as the case may be, expires before the end of a month, such period shall be extended to the end of such month.</p>	<p>296(9)</p>	<p>Where after extension of the period referred to in sub-section (8), the period of limitation for making an order of assessment or reassessment, expires before the end of a month, such period shall be extended to the end of such month.</p>	