

F.No.225/56/2026/ITA-II
Government of India
Ministry of Finance
Department of Revenue
Central Board of Direct Taxes

10018, Kartavya Bhawan I, New Delhi,
the 4th June, 2026

To

All Pr.Chief Commissioners of Income-tax/ Chief Commissioners of Income-tax
All Pr. Director Generals of Income-tax/ Director Generals of Income-tax.

Madam/Sir,

Subject: Guidelines for Compulsory Selection of returns for Complete Scrutiny during the Financial Year 2026-27 – procedure for compulsory selection in such cases – reg.

Kindly refer to the above.

2. The Guidelines for Compulsory Selection of returns filed during the financial year 2025-26 under the Income-tax, Act 1961 are hereby issued in pursuance of Section 536(2)(c) of the Income-tax Act, 2025. The parameters for compulsory selection of returns for complete scrutiny during Financial Year 2026-27 and procedure for compulsory selection in such cases are prescribed as under:

Systems Scenario code	Parameters	Procedures
CS 01	Cases pertaining to survey u/s 133A of the Income-tax Act,1961 - Case(s) of the assessee(s), in whose case survey u/s 133A of the said Act [other than survey u/s 133A(2A) of the said Act] has been conducted on or after 01.04.2024.	Cases shall be selected for compulsory scrutiny under this parameter by Directorate of Income-tax (Systems) with the approval of the DGIT(Systems), Delhi on the basis of information of survey cases provided by Commissioner (OSD)(Investigation), CBDT. Notice u/s 143(2) of the Income-tax Act, 1961 shall be served on the assessee through the Prescribed Income-tax Authority or the Assessing Officer concerned. The Pr. CCsIT/ Pr. DGsIT/ DGsIT(Inv.)/ CCsIT(Central) shall provide consolidated list of cases in respect of their jurisdiction to be selected under this parameter to the Commissioner (OSD) (Investigation), CBDT, in the format prescribed by the

		<p>Commissioner (OSD) (Investigation), CBDT.</p> <p>If any case is lying outside Central Charges, the Pr. CIT/ Pr. DIT/ CIT/ DIT concerned shall ensure that such case is transferred to the Central Charge within 15 days of service of notice under section 143(2) of the Income-tax Act, 1961.</p> <p><i>(For Assessing Officers in International Taxation and Central Charges refer para 3 at page no.5)</i></p>
CS 02	<p>Cases pertaining to Search initiated or Requisition made</p> <p>Case(s) of the assessee(s), in whose case Search u/s 132 of the Income-tax Act, 1961 has been initiated or Requisition u/s 132A of the said Act has been made, on or after 01.04.2024.</p> <p>For Searches initiated or Requisition made on or after 01.09.2024, the return shall be selected for the assessment year, which is covered by the provisions of section 158BA (6) of the said Act.</p>	<p>Cases shall be selected for compulsory scrutiny by the Assessing Officer concerned, with prior administrative approval of Pr. CIT/ Pr. DIT/ CIT/ DIT concerned.</p> <p>If any case is lying outside Central Charges, the Pr. CIT/ Pr. DIT/ CIT/ DIT concerned shall ensure that such case is transferred to Central Charge within 15 days of service of notice under section 143(2) of the Income-tax Act, 1961.</p> <p><i>(For Assessing Officers in International Taxation and Central Charges refer para 3 at page no.5)</i></p>
CS 03	<p>Cases where notice u/s 148 of the Income-tax Act, 1961 has been issued</p> <p>(i) Cases wherein <i>search & seizure action has been initiated on or after the 01.04.2021 but before 01.09.2024 or survey action conducted on or after the 01.04.2021:</i></p>	<p>The Jurisdictional Assessing Officer (JAO) concerned shall serve the notice u/s 143(2) of the Income-tax Act, 1961 wherein return has been furnished.</p> <p>If any case is lying outside central charges after the issue of such notice, Pr.CIT/Pr.DIT/CIT/DIT concerned shall ensure that such cases are transferred to central charges u/s 127 of the said Act, only if covered by <u>the Board's guidelines under F.No.</u></p>

		<p><u>299/107/2013-IT(Inv.III)/1568</u> dated <u>25.04.2014</u>.</p> <p>Jurisdictional Assessing Officers (JAOs) shall upload the underlying documents on the basis of which notice u/s 148 of the said Act was issued, wherein return has been furnished or has not been furnished.</p>
	<p>(ii) Cases, other than search & seizure/survey, wherein notice u/s 148 of the said Act has been issued and which are to be completed on or before 31.03.2027:</p>	<p>The Directorate of Income-tax (Systems) shall forward these cases to National Faceless Assessment Centre (NaFAC), which will take further necessary action. Notice u/s 143(2) of the said Act shall be served on the assessee through NaFAC, where return has been furnished.</p> <p>Jurisdictional Assessing Officers (JAOs) shall upload the underlying documents on the basis of which notice u/s 148 of the said Act was issued, wherein return has been furnished or has not been furnished.</p> <p><i>(For Assessing Officers in International Taxation and Central Charges refer para 3 at page no.5)</i></p>
CS 04	<p>Cases related to registration/ approval under various sections of the Income-tax Act, 1961, such as 12A, 12AB, 35(1)(ii)/ (iia)/ (iii), 10(23C)(iv)/(v)/(vi)/(via), etc.</p> <p>Cases where registration /approval under various sections of the said Act, such as section 12A, 12AB, 35(1)(ii)/(iia)/(iii), 10(23C)(iv)/(v)/(vi)/(via) etc.,</p> <p>(i) have not been granted or have been cancelled/withdrawn by the Competent Authority on or before 31.03.2025 and,</p>	<p>Cases shall be selected for compulsory scrutiny using this parameter by Directorate of Income-tax (Systems) with the approval of DGIT(Systems), Delhi on the basis of returns filed by these entities in FY 2025-26.</p> <p>Notice u/s 143(2) of the Income-tax Act, 1961 shall be served on the assessee through NaFAC or the prescribed income-tax authority.</p> <p>The Jurisdictional Assessing Officers shall upload the underlying documents</p>

	<p>(ii) the assessee has been found to be claiming tax-exemption/deduction in the return filed in ITR-7,</p> <p>However, where such orders of withdrawal of registration/approval have been reversed/set-aside in appellate proceedings, those cases will not be selected under this parameter.</p>	<p>containing specific information regarding this parameter immediately.</p> <p><i>(For Assessing Officers in International Taxation and Central Charges refer para 3 at page no.5)</i></p>
CS05	<p>Cases involving addition in an earlier assessment year(s) on a recurring issue of law or fact and/or law and fact:</p> <p>Where the addition in an earlier assessment year(s) on a recurring issue of law or fact and/or law and fact (including transfer pricing issue) is:</p> <p>a. exceeding Rs. 50 Lakh in eight metro charges at Ahmedabad, Bengaluru, Chennai, Delhi, Hyderabad, Kolkata, Mumbai and Pune;</p> <p>b. exceeding Rs. 20 lakh in charges other than the eight metro charges;</p> <p>and, where such an addition:</p> <p>(i) has become final, as no further appeal has been preferred against the assessment order; or</p> <p>(ii) has been upheld by the Appellate Authorities in favour of Revenue, even if further appeal of assessee is pending, against such order.</p>	<p>For Parameters CS 05 and CS 06:</p> <p>The Jurisdictional Assessing Officers (JAOs) shall prepare a list of cases falling under this parameter and the same may be submitted for the administrative approval of Pr.CIT/Pr.DIT/CIT/DIT concerned.</p> <p>The consolidated list of such cases shall be submitted by the Pr.CIT/Pr.DIT/CIT/DIT to the Pr.CCIT concerned.</p> <p>Pr.CCIT concerned shall forward this list of cases to the Directorate of Income-tax (Systems) latest by 15.06.2026.</p> <p>Notice u/s 143(2) of the Income-tax Act, 1961 shall be served on the assessee through NaFAC.</p> <p>The Jurisdictional Assessing Officers shall upload the underlying documents</p>
CS06	<p>Cases related to specific information regarding tax-evasion:</p> <p>Cases, in respect of which:</p> <p>(a) specific information pointing out tax-evasion for the relevant assessment year is provided by any law-enforcement agency, (Investigation Wing/ Intelligence/ Regulatory Authority/ Agency, etc.) and</p>	

	<p>(b) the return for the relevant assessment year is furnished by the assessee.</p> <p><i>It is clarified that where return has been furnished in response to notice u/s 142(1) of the Income-tax Act, 1961 and such notice u/s 142(1) of the said Act was issued in connection with information contained in NMS Cycle/ AIS/ Statement of Financial Transactions (SFT)/ CPC-TDS information/ information received from Directorate of I&CI, such return will not be taken up for compulsory scrutiny unless falling under Parameter CS 06.</i></p>	<p>containing specific information regarding this parameter immediately.</p> <p><i>(For Assessing Officers in International Taxation and Central Charges refer para 3 at page no.5)</i></p>
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3. **For Assessing Officers in International Taxation and Central charges:** Cases may be selected for compulsory scrutiny by the International Taxation and Central charges following the above prescribed parameters at Para 2 with prior administrative approval of Pr.CIT/Pr.DIT/CIT/DIT concerned and these selected cases shall continue to be handled by International Taxation and Central Circle charges respectively, as earlier. It is further clarified that communication to NaFAC for access and/or further action after selection for Compulsory Scrutiny will not apply to the International Taxation and Central charges.

4. **Time limit:** As per the proviso to section 143(2) of the Income-tax Act, 1961 and in terms of section 536(2)(c) of the Income-tax Act, 2025, the time limit for service of notice u/s 143(2) of the Income-tax Act, 1961 for the ITRs filed in the Financial Year (FY) 2025-26 is **30.06.2026**.

5. These instructions may be brought to the notice of all concerned for necessary compliance.



(Dr.Indu Bala)

Deputy Secretary to Government of India

Copy to:

1. Chairman, CBDT & All Members, CBDT
2. All Joint Secretaries/CsIT, CBDT
3. All Directors/Deputy Secretaries, CBDT
4. DGIT (Systems)-Delhi and Bengaluru for necessary action
5. Web Manager for uploading on the Departmental website
6. JDIT, Data-Base Cell for uploading on irsofficersonline website
7. Guard File



Deputy Secretary to Government of India