



2019 SALT BASICS SCHOOL

January 20 – 25, 2019
Dallas/Ft. Worth, Texas

Agenda – 1-15-2019

Sunday, January 20, 2019

All Tracks

5:00 – 8:00 p.m.	Registration/Dinner/Networking - <i>Meritage</i>
7:15 – 8:00 p.m.	Tablet Orientation – <i>Meritage</i>

Monday, January 21, 2019

All Tracks

7:45 – 8:30	Introductions of Staff, Facilities and Format – <i>Val Verde</i> Charles Drury, COST Vice-President/Chief Operating Officer, Washington, DC Arthur Parham, COST Chair, Entergy Services, Inc., Woodlands, TX		
8:30 – 11:00	State and Local Practice Overview – <i>Val Verde</i> <u>Curriculum:</u> Overview of major state taxes and state revenue programs including: income/franchise, sales/use, property and employment taxes; credits, incentives and unclaimed property. <u>Instructors:</u> Gerry Amoroso, Industrial Tax Consulting, Austin, TX Harley Duncan, KPMG*, Washington, DC Arthur Parham, Entergy Services, Inc., Woodlands, TX Breen Schiller, Horwood Marcus & Berk*, Chicago, IL		
9:30– 9:45	Refreshment & Networking Break		
11:00 –12:30	Financial Statements/Federal Tax Issues for the State Tax Professional – <i>Val Verde</i> <u>Curriculum:</u> Overview of tax accounting for above and below the line financial statement presentations; federal tax concepts that affect computation of state income/franchise tax base; federal transactions that may trigger state income or sales tax consequences; international tax concepts affecting state tax calculation. <u>Instructors:</u> Kelly Smith, PwC*, Atlanta, GA Malcolm Williams, PwC*, Dallas, TX		
12:30 – 1:30	Lunch – <i>Windfall Dining Room</i>		
Income and SALT Tracks		Sales Track	
1:30 – 3:15	Basic Unitary/Filing Methods – <i>Val Verde</i> <u>Curriculum:</u> Overview of filing methods required by the various states with a discussion of the unitary method. <u>Instructors:</u> Todd Lard, Eversheds Sutherland (US)*, Washington, DC Robert Porcelli, PwC*, McLean, VA		Restrictions on A State's Ability to Tax – <i>Delaney</i> <u>Curriculum:</u> Review of the various restrictions on a state's ability to impose taxes such as constitutional restrictions, federal legislation and judicial pronouncements. <u>Instructors:</u> Sherry Lam, Grant Thornton*, Fort Lauderdale, FL

3:15 – 3:30	Refreshment & Networking Break			Christopher Lutz, Horwood Marcus & Berk*, Chicago, IL Scott Peterson, Avalara*, Nashville, TN
3:30 – 5:30	State Income Tax Base I – <i>Val Verde</i> <u>Curriculum:</u> Review concepts involved in computing state income tax base, including tie-in to federal return, modifications to federal tax base, multi-corporate group filing options, business/non-business determination and allocation/apportionment. <u>Instructors:</u> Scott Bedunah, Deloitte*, Dallas, TX Christanna Taylor, Deloitte*, Dallas, TX	2:15 – 3:15 3:15 – 3:30 4:30 – 5:30	Facilitated Breakout Refreshment & Networking Break Facilitated Breakout	
4:45 – 5:30	Facilitated Breakout			
6:15 – 9:00	Vegas Night with COST – <i>Austin Ranch Roundup</i>			
Tuesday, January 22, 2019				
Income Tax Track		Sales Tax Track and SALT Track		
8:00 – 12:00	State Income Tax Admin. & Compliance – <i>Delaney</i> <u>Curriculum:</u> Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements. <u>Instructors:</u> Susan Courson-Smith, Pfizer, Memphis, TN Amy Thomas Laub, Nationwide, Columbus, OH Frances Sewell, NextEra Energy, Juno Beach, FL Steven Spaletto, Deloitte*, Indianapolis, IN Patrick Waldo, Nationwide, Columbus, OH Michael Woo, Retired, San Ramon, CA	8:00 – 10:00	Introduction to Sales Tax Theory/Definition of Key Terms – <i>Val Verde</i> <u>Curriculum:</u> Review history, theory and policy underlying sales taxation; define key terms and concepts used to implement the tax. <u>Instructors:</u> Kathy Saxton, Deloitte*, Atlanta, GA Liudmila Wilhelm, Deloitte*, Atlanta, GA	
10:00 – 10:15	Refreshment & Networking Break			
12:00 – 1:00	Lunch – <i>Windfall Dining Room</i>	10:15 - 12:00	Sales Tax Base, Taxability and Characterization - <i>Val Verde</i> <u>Curriculum:</u> Analyze nature of sales vs. use taxes, including typical statutes and other authorities; explore application of form over substance doctrine and presumption for taxing tangible personal property. <u>Instructors:</u> Brandon Jumonville, KPMG*, Dallas, TX Becca Thompson, KPMG*, Dallas, TX	
1:00 – 5:15	State Income Tax Admin. & Compliance (cont'd.) – <i>Delaney</i> <u>Curriculum:</u> Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements.	12:00– 1:00	Lunch – <i>Windfall Dining Room</i>	
2:45 – 3:00	Refreshment & Networking Break	1:00 – 2:45	Sales Tax Base, Taxability and Characterization (cont'd) – <i>Val Verde</i> <u>Curriculum:</u> Analyze nature of sales vs. use taxes, including typical statutes and other authorities; explore application of form over substance doctrine and presumption for taxing tangible personal property.	

		1:45 –2:45	Facilitated Breakout		
		2:45 –3:00	Refreshment & Networking Break		
		3:00 – 5:30	Sales Tax - Exempt and Non-Taxable Transactions – <i>Val Verde</i> <u>Curriculum:</u> Examine entity-level and activity-related exemptions; use of exemption certificates, and transactions outside scope of the statute. <u>Instructors:</u> Jeff Lemmons, PwC*, Dallas, TX Brian Tan, PwC*, Dallas, TX		
6:30 – 9:30	Optional Evening Outing – Tour of AT&T Stadium (Home of the Dallas Cowboys) – <i>Sponsored by: Ryan</i> Get a behind the scenes tour of one of the largest stadiums in the U.S. Space is limited and is on a first come basis.				
Wednesday, January 23, 2019					
Income Tax Track			Sales Tax Track and SALT Track		
8:00 – 12:00	State Income Tax Admin. & Compliance (cont'd.) – <i>Delaney</i> <u>Curriculum:</u> Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements. <u>Instructors:</u> Susan Courson-Smith, Pfizer, Memphis, TN Amy Thomas Laub, Nationwide, Columbus, OH Frances Sewell, NextEra Energy, Juno Beach, FL Steven Spaletto, Deloitte*, Indianapolis, IN Patrick Waldo, Nationwide, Columbus, OH Michael Woo, Retired, San Ramon, CA	8:00 – 11:15	Sales Tax – Situsing – <i>Val Verde</i> <u>Curriculum:</u> Review how states situs sales of tangible personal property, services, digital transactions, etc..., and how these methods can differ depending on a variety of factors. <u>Instructors:</u> Karen Currie, EY*, Dallas, TX Joe Fichera, Ryan*, Houston, TX Randy Hilger, Ryan*, St. Louis, MO		
		10:15– 10:30	Refreshment & Networking Break		
		10:30– 11:15	Facilitated Breakout		
			Sales Tax Track		SALT Track
10:15 – 10:30	Refreshment & Networking Break	11:15– 12:15	Gross Receipts and Net Worth Taxes – <i>Val Verde</i> <u>Curriculum:</u> An overview of other methods of taxation that states are using to impose tax. <u>Instructor:</u> Donna Rutter, EY*, Houston, TX	11:15 – 12:00	Property Taxes – <i>Ste. Genevieve</i> <u>Curriculum:</u> An overview of property taxation and the various methods of valuation and imposition. <u>Instructor:</u> Fred Nicely, COST, Washington, DC
12:00 – 1:00	Lunch – <i>Windfall Dining Room</i>	12:15– 1:15	Lunch – <i>Windfall Dining Room</i>	12:00 – 1:00	Lunch – <i>Windfall Dining Room</i>
1:00 – 2:30	State Income Tax Admin. & Compliance (REVIEW) – <i>Delaney</i> <u>Curriculum:</u> Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements.	1:15 – 3:30	Sales & Use Tax -Administration & Compliance – <i>Val Verde</i> <u>Curriculum:</u> Review of vital issues associated with administration of the sales/use tax function, including: registration, exemption certificates,	1:00 – 2:30	Legislation – <i>Ste. Genevieve</i> <u>Curriculum:</u> A session that will cover the basics of legislation and how it can be used to benefit the taxpayer. <u>Instructors:</u> Deborah Bierbuam, AT&T, Bedminster, NJ Nikki Dobay, COST, Portland, OR Aziza Farooki, COST, Washington, DC

			taxability decisions, software, return preparation, claims for refund. <u>Instructors:</u> Tony Chirico, Medtronic Inc., Mansfield, MA Carolynn Kranz, Industry Sales Solutions*, Washington, DC Diane Yetter, YETTER*, Chicago, IL		TBD
2:30 – 3:30	Gross Receipts and Net Worth Taxes – Delaney <u>Curriculum:</u> An overview of other methods of taxation that states are using to impose tax. <u>Instructor:</u> Donna Rutter, EY*, Houston, TX			2:30 – 3:30	Gross Receipts and Net Worth Taxes – Delaney <u>Curriculum:</u> An overview of other methods of taxation that states are using to impose tax. <u>Instructor:</u> Donna Rutter, EY*, Houston, TX
3:30	Session adjournment for the Day!!				
3:30	Evening On Your Own				
Thursday, January 24, 2019					
Income Tax Track		Sales Tax Track		SALT Track	
8:00 – 10:00	Unitary Business Principle & Apportionment – Val Verde <u>Curriculum:</u> Examine the unitary business principle and its implications for formulary apportionment of multi-corporate groups; computation of factors: sales, property and payroll. <u>Instructors:</u> Barbara Coulter, PwC*, Atlanta, GA Benjamin Muilenburg, PwC*, Sacramento, CA	8:00– 12:00	Sales & Use Tax -Administration & Compliance (cont'd) – Delaney <u>Curriculum:</u> Review of vital issues associated with administration of the sales/use tax function, including: registration, exemption certificates, taxability decisions, software, return preparation, claims for refund. <u>Instructors:</u> Tony Chirico, Medtronic Inc., Mansfield, MA Carolynn Kranz, Industry Sales Solutions*, Washington, DC Diane Yetter, YETTER*, Chicago, IL	8:00 – 10:00	Unitary Business Principle & Apportionment – Val Verde <u>Curriculum:</u> Examine the unitary business principle and its implications for formulary apportionment of multi-corporate groups; computation of factors: sales, property and payroll. <u>Instructors:</u> Barbara Coulter, PwC*, Atlanta, GA Benjamin Muilenburg, PwC*, Sacramento, CA
		10:00– 10:15	Refreshment & Networking Break		
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10:15 – 12:00	Restrictions on A State's Ability to Tax – Val Verde <u>Curriculum:</u> Review of the various restrictions on a state's ability to impose taxes such as constitutional restrictions, federal legislation and judicial pronouncements. <u>Instructors:</u> Karl Frieden, COST, Washington, DC Mitchell Newmark, Morrison Foerster*, New York, NY			10:15 – 12:00	Restrictions on A State's Ability to Tax – Val Verde <u>Curriculum:</u> Review of the various restrictions on a state's ability to impose taxes such as constitutional restrictions, federal legislation and judicial pronouncements. <u>Instructors:</u> Karl Frieden, COST, Washington, DC Mitchell Newmark, Morrison Foerster*, New York, NY

	Andres Vallejo, Reed Smith*, San Francisco, CA				Andres Vallejo, Reed Smith*, San Francisco, CA
12:00 – 1:00	Lunch – <i>Windfall Dining Room</i>	12:00 – 1:00	Lunch – <i>Windfall Dining Room</i>	12:00 – 1:00	Lunch – <i>Windfall Dining Room</i>
1:00 – 4:00	State Income Tax Base II – Val Verde <u>Curriculum:</u> In-depth focus on apportionment formula variations, special issues in apportionment, sourcing services & intangible income; detailed analysis of tax base additions & subtractions, multinational issues & credits. <u>Instructors:</u> Greg Abbott, Alvarez Marsal Taxand*, Atlanta, GA Emilio Martinez, Alvarez Marsal Taxand*, Miami, FL	1:00 – 5:30	Sales & Use Tax -Administration & Compliance (cont'd.) – Delaney <u>Curriculum:</u> Review of vital issues associated with administration of the sales/use tax function, including: registration, exemption certificates, taxability decisions, software, return preparation, claims for refund. Refreshment & Networking Break	1:00 – 4:00	State Income Tax Base II – Val Verde <u>Curriculum:</u> In-depth focus on apportionment formula variations, special issues in apportionment, sourcing services & intangible income; detailed analysis of tax base additions & subtractions, multinational issues & credits. <u>Instructors:</u> Greg Abbott, Alvarez Marsal Taxand*, Atlanta, GA Emilio Martinez, Alvarez Marsal Taxand*, Miami, FL
3:00 – 3:15	Refreshment & Networking Break	3:00 – 3:15		3:00 – 3:15	Refreshment & Networking Break
3:15 – 4:00	Facilitated Breakout			3:15 – 4:00	Facilitated Breakout
4:00 – 5:30	Pass-Through or Disregarded Entities – Val Verde <u>Curriculum:</u> Recognize the income and sales/use tax significance of various pass-through or disregarded entities, including federal treatment of the entity, state tax base implications, and impact on income allocation & apportionment. <u>Instructors:</u> Christopher Grissom, Bradley Arant Boult Cummings*, Birmingham, AL Lori Wiseman, KPMG*, Dallas, TX			4:00 – 5:30	Pass-Through or Disregarded Entities – Val Verde <u>Curriculum:</u> Recognize the income and sales/use tax significance of various pass-through or disregarded entities, including federal treatment of the entity, state tax base implications, and impact on income allocation & apportionment. <u>Instructors:</u> Christopher Grissom, Bradley Arant Boult Cummings*, Birmingham, AL Lori Wiseman, KPMG*, Dallas, TX
6:30 – 8:30	Trivia and Game Night with COST – Join your fellow attendees for a night of trivia and fun at the Hilton. The fun will start at 6:30; trivia will start at 7:30 pm in the <i>Meritage</i> . Prizes will be given to the winning team.				

Friday, January 25, 2019

All Tracks

8:00 – 9:15	<p>State Tax Research Tools – Val Verde</p> <p><u>Curriculum:</u> Practical tips on conducting basic SALT research, including online databases and hardcopy text, with a brief assessment of select commercial resources; and preparing an effective file memo.</p> <p><u>Instructors:</u> Matthew Mantle, Jones Walker, New Orleans, LA</p>
9:15 – 10:15	<p>Local Taxes – Val Verde</p> <p><u>Curriculum:</u> Survey of various local taxes, including gross receipts, sales/use, and business operating taxes, with discussion of best practices for compliance.</p> <p><u>Instructors:</u> Nicole Crighton Vescio, KPMG*, New York NY Frank Gallo, Reed Smith*, Philadelphia, PA</p>
10:15 – 10:45	Refreshment Break/Hotel Checkout
10:45 – 11:45	<p>Evolving Unclaimed Property and VAT Issues – Val Verde</p> <p><u>Curriculum:</u> Overview of emerging issues associated with unclaimed property; and review of operation of a VAT and is a national state-based VAT in the U.S. future?</p> <p><u>Instructors:</u> Patrick Reynolds, COST, Washington, DC Philippe Stephanny, KPMG*, Washington, DC</p>
11:45 – 1:00	<p>Preparing for Audit Challenge & Controversy – Val Verde</p> <p><u>Curriculum:</u> Practical tips on dealing with auditor proposed changes, including best practices for responding to notices of proposed assessments and preparing for informal and formal hearings with the state departments of revenue.</p> <p><u>Instructors:</u> Kristi Bryant, Ryan*, Dallas, TX John Murphy, Kolesar & Associates, Reno, NV Daniel Stanley, Honigman Miller Schwartz & Cohn*, Lansing, MI</p>
1:00	Basics School Adjourns – Lunch is Available in the Windfall Dining Room