



**COST 2018 SALT Basics School**  
**January 21 – January 26, 2018**  
**AT&T Executive Conference Center**  
**Austin, Texas**  
**Agenda 1/15/18**

**Sunday, January 21, 2018**

5:00 – 8:00 p.m. Registration, Dinner & Networking – *Tejas Dining Room*  
7:15 - 8:00 p.m. Tablet Orientation

**Monday, January 22, 2018**

**Plenary Session:**

7:30 – 8:00 **Tablet Orientation** - For those who were unable to attend the Orientation last night – *Salon C*

8:00 – 9:00 **Introductions of Staff, Facilities and Format** – *Salon C*  
Charles Drury, COST Vice-President/Chief Operating Officer, Washington, DC  
Arthur Parham, Entergy Services, Inc., Woodlands, TX

9:00 – 12:00 **State and Local Practice Overview** – *Salon C*  
Gerard Amoroso, Popp Hutcheson\*, Austin, TX  
Harley Duncan, KPMG\*, Washington, DC  
Arthur Parham, Entergy Services, Inc., Woodlands, TX  
Breen Schiller, Horwood Marcus & Berk\*, Chicago, IL

Curriculum: Overview of major state taxes and state revenue programs including: income/franchise, sales/use, property and employment taxes; credits, incentives and unclaimed property.

10:00 – 10:15 Refreshment & Networking Break  
11:00 – 12:00 Facilitated Breakout Session

12:00 – 1:00 Lunch & Networking – *Tejas Dining Room*

1:00 – 3:00 **Constitutional Restrictions** – *Salon C*  
Karl Frieden, COST, Washington, DC  
Mitchell Newmark, Morrison Foerster\*, New York, NY  
Andres Vallejo, Reed Smith\*, San Francisco, CA

Curriculum: Examine Due Process, Commerce, Supremacy and Equal Protection Clauses and other Constitutional restrictions on the rights of states to levy taxes.

3:00 – 3:15 Refreshment & Networking Break

3:15 – 3:45 **Evolving Property Tax Issues** – *Salon C*  
Gerard Amoroso, Popp Hutcheson\*, Austin, TX  
Fred Nicely, COST, Washington, DC

Curriculum: Overview of evolving property tax issues including approaches to value, intangibles, split rolls/cap, inventory tax & third party audits.

3:45 – 4:45 **Local Taxes** – *Salon C*  
Frank Gallo, Reed Smith\*, Philadelphia, PA  
Glenn McCoy, KPMG\*, New York, NY

Curriculum: Survey of various local taxes, including gross receipts, sales/use, and business operating taxes, with discussion of best practices for compliance.

4:45 – 5:30 **Streamlined Sales Tax Project – Changing the Landscape** – *Salon C*  
Fred Nicely, COST, Washington, DC  
Patrick Reynolds, COST, Washington, DC

Curriculum: Overview of what the SSTP is and what are its future prospects

6:15 – 8:30 Vegas Night with COST – *Rowling Ballroom 5&6*

**Tuesday, January 23, 2018**

**Plenary Session:**

8:00 – 11:00 **Jurisdiction to Tax** – *Salon C*  
Todd Lard, Eversheds Sutherland (US)\*, Washington, DC  
Robert Porcelli, PwC\*, McLean, VA

Curriculum: Analyze P.L. 86-272 and explore the parameters of nexus for income-based and sales/use taxes; review authorities for protected vs. unprotected activities; survey state-specific and administrative exemptions.

10:00 – 10:15 Refreshment & Networking Break  
10:15 – 11:00 Facilitated Breakout Session

**Income Tax and SALT Concepts Tracks Breakout**

11:00 – 12:15	<b>Financial Statements/Federal Tax Issues for the State Tax Professional – Salon C</b> Kelly Smith, PwC*, Atlanta, GA Malcolm Williams, PwC*, Dallas, TX
Curriculum:	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.
12:15 – 1:15	Lunch & Networking – <i>Tejas Dining Room</i>
1:15 – 3:15	<b>Financial Statements/Federal Tax Issues for the State Tax Professional (continued) – Salon C</b>
2:15 – 3:15	Facilitated Breakout Session
3:15 – 3:30	Refreshment & Networking Break
3:30 – 5:30	<b>Pass-Through or Disregarded Entities – Salon C</b> Steve Lyell, KPMG*, Houston, TX Lori Wiseman, KPMG*, Dallas, TX
Curriculum:	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.
4:45 – 5:30	Facilitated Breakout Session
6:30 – 9:30 p.m.	Outing to 6 <sup>th</sup> Street – Enjoy sights and sounds that make Austin famous.

**Sales & Use Tax Track Breakout**

11:00 – 12:15	<b>Financial Statements Issues for the State Transactional Tax Professional – Classroom 105</b> Justin Hill, EY*, Dallas, TX David Yerkes, EY*, Dallas, TX
Curriculum:	Overview of tax accounting for above and below the line financial statement presentations with a primary focus on issues that impact the calculations and reporting that are most relevant to non-income tax professionals.
12:15 – 1:15	Lunch & Networking – <i>Tejas Dining Room</i>
1:15 – 3:15	<b>Financial Statements Issues for the State Transactional Tax Professional (continued) – Classroom 105</b>
3:15 – 3:30	Refreshment & Networking Break
3:30 – 5:45	<b>Introduction to Sales Tax Theory/Definition of Key Terms – Classroom 105</b> Kathy Saxton, Deloitte*, Atlanta, GA Liudmila Wilhelm, Deloitte*, Atlanta, GA
Curriculum:	Review history, theory and policy underlying sales taxation; define key terms and concepts used to implement the tax.
6:30 – 9:30 p.m.	Outing to 6 <sup>th</sup> Street – Enjoy sights and sounds that make Austin famous

Wednesday, January 24, 2018

**Income Tax and SALT Concepts Tracks Breakout:**

8:00 – 10:00	<b>State Income Tax Base I – Salon C</b> Allison Anderson, Deloitte*, Dallas, TX Scott Bedunah, Deloitte*, Dallas, TX
Curriculum:	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.
9:00 – 10:00	Facilitated Breakout Session
10:00 – 10:15	Refreshment & Networking Break
10:15 – 12:15	<b>Unitary Business Principle &amp; Apportionment – Salon C</b> Barbara Coulter, PwC*, Atlanta, GA Erin Eakes, PwC*, Sacramento, CA
Curriculum:	Examine the unitary business principle and its implications for formulary apportionment of multi-corporate groups; computation of factors: sales, property and payroll.
12:15 – 1:15	Lunch & Networking – <i>Tejas Dining Room</i>
1:15 – 2:00	<b>Unitary Business Principle &amp; Apportionment – Salon C (continued)</b> Facilitated Breakout Session
2:00 – 4:30	<b>State Income Tax Base II – Salon C</b> Greg Abbott, Alvarez Marsal Taxand*, Atlanta, GA Sloane Kukanza, Alvarez Marsal Taxand*, Atlanta, GA
Curriculum:	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.
3:30 – 3:45	Refreshment & Networking Break
3:45 – 4:30	Facilitated Breakout Session
4:30 – 5:30	<b>Net Worth/Capital Taxes – Salon C</b> Donna Rutter, EY*, Dallas, TX
Curriculum:	Explore alternative tax bases computed on net worth and capital, with the state tax planning implications these taxes create.
7:00	Trivia and Game Night - <i>Tejas Dining Room</i>

**Sales & Use Tax Track Breakout:**

8:00 – 11:15	<b>Sales Tax Base, Taxability and Characterization – Classroom 105</b> Shawn Fraciane, KPMG*, Houston, TX Rachael Hartfield, KPMG*, Houston, TX
Curriculum:	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.
10:00 – 10:15	Refreshment & Networking Break
10:15 – 11:15	Facilitated Breakout Session
11:15 – 12:15	<b>Sales Tax – Exempt and Non-Taxable Transactions – Classroom 105</b> Donna Daday, PwC*, Philadelphia, PA Tim Winks, PwC*, McLean, VA
Curriculum:	Examine entity-level and activity-related exemptions; use of exemption certificates, and transactions outside scope of the statute.
12:15 – 1:15	Lunch & Networking – <i>Tejas Dining Room</i>
1:15 – 2:15	<b>Sales Tax – Exempt and Non-Taxable Transactions (continued) – Classroom 105</b>
2:15 – 5:30	<b>Sales Tax - Siting – Classroom 105</b> Karen Currie, EY*, Dallas, TX Randy Hilger, Ryan*, Saint Louis, MO
Curriculum:	Review how states situs sales of tangible personal property, services, digital transactions, etc..., and how these methods can be different depending on a variety of factors.
3:30 – 3:45	Refreshment & Networking Break
4:30 – 5:30	Facilitated Breakout Session
7:00	Trivia and Game Night - <i>Tejas Dining Room</i>

<b>Income Tax Track:</b>		<b>SALT Concepts Track:</b>		<b>Sales &amp; Use Tax Track:</b>	
8:00 – 12:15	<b>State Income Tax Admin. &amp; Compliance – Salon C</b> Susan Courson-Smith, Pfizer, Memphis, TN Tracy George, The Coca Cola Company, Atlanta, GA Frances Sewell, NextEra Energy, Juno Beach, FL Steven Spaletto, Deloitte*, Indianapolis, IN Michael Woo, Bank of the West, Ramon, CA  Curriculum: Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements.	8:00 – 10:15	<b>Introduction to Sales Tax Theory/Definition of Key Terms – Classroom 107</b> Kathy Saxton, Deloitte*, Atlanta, GA Liudmila Wilhelm, Deloitte*, Atlanta, GA  Curriculum: Review history, theory and policy underlying sales taxation; define key terms and concepts used to implement the tax.	8:00 - 12:00	<b>Sales &amp; Use Tax - Administration &amp; Compliance – Salon AB</b> Tony Chirico, Medtronic Inc., Mansfield, MA Carolynn Kranz, Industry Sales Solutions*, Washington, DC Diane Yetter, YETTER*, Chicago, IL  Curriculum: 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.
10:00-10:15	Refreshment & Networking Break	10:15 - 10:30	Refreshment & Networking Break	9:35 – 9:50	Refreshment & Networking Break
12:15 – 1:15	Lunch & Networking – <b>Tejas Dining Room</b>	10:30 – 12:30	<b>Sales Tax Base, Taxability and Characterization – Classroom 107</b> Shawn Fraciane, KPMG*, Houston, TX Rachael Hartfield, KPMG*, Houston, TX  Curriculum: 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.	11:50 – 12:50	Lunch & Networking – <b>Tejas Dining Room</b>
1:15 – 5:45	<b>State Income Tax Admin. &amp; Compliance (continued) – Salon C</b>  Curriculum: Best practices review of making files audit ready, organizing and filing workpapers, performing research, documenting positions, and responding to notices.	12:30 – 1:30	Lunch & Networking – <b>Tejas Dining Room</b>	12:50 – 5:45	<b>Sales &amp; Use Tax - Administration &amp; Compliance (continued) – Salon AB</b> Same Panel as Morning  Curriculum: Focus on sales/use function compliance issues including use tax accrual, record retention, data analysis for preparation of returns, filing amended returns, responding to notices, and tax automation.
3:30 – 3:45	Refreshment & Refreshment Break	1:30 – 3:30	<b>Sales Tax - Exempt and Non-Taxable Transactions – Classroom 107</b> Donna Daday, PwC*, Philadelphia, PA Tim Winks, PwC*, McLean, VA  Curriculum: Examine entity-level and activity-related exemptions; use of exemption certificates, and transactions outside scope of the statute.	2:35 – 2:50	Refreshment & Networking Break
		3:30 – 3:45	Refreshment & Networking Break		
		3:45 – 5:45	<b>Sales Tax - Situsng – Classroom 107</b> Karen Currie, EY*, Dallas, TX Randy Hilger, Ryan*, Saint Louis, MO  Curriculum: Review how states situs sales of tangible personal property, services, digital transactions, etc..., and how these methods can be different depending on a variety of factors.		

**Plenary Sessions**

8:00 – 9:15	<b>State Tax Research Tools – Salon C</b> Matthew Mantle, Jones Walker*, New Orleans, LA Gregg Perry, Austin, TX  Curriculum: 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.
9:15 – 10:15	<b>SALT Career Choices – Salon C</b> James Eads, Ryan*, Austin, TX Douglas Lindholm, COST, Washington, DC Charolette Noel, Jones Day*, Dallas, TX Jennifer Shaanty, EY*, Houston, TX  Curriculum: The speakers will discuss the considerations and actions that professionals new to the practice of state taxation should be aware of in order to maximize their career potential and get the greatest satisfaction from their career.
10:15 – 10:30	<b>Refreshment &amp; Networking Break and Hotel Check Out</b>
10:30 – 11:45	<b>Evolving Unclaimed Property and VAT Issues – Salon C</b> Patrick Reynolds, COST, Washington, DC Philippe Stephanny, KPMG*, Washington, DC  Curriculum: 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?
11:45 – 12:45	<b>Preparing for Audit Challenge &amp; Controversy – Salon C</b> Kelly Butler, Ryan*, Houston, TX Tracy George, The Coca Cola Company, Atlanta, GA John Murphy, Kolesar & Associates, Reno, NV Daniel Stanley, Honigman Miller Schwartz & Cohn*, Lansing, MI  Curriculum: 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 department of revenues.
12:45 – 1:45	Lunch & Networking – <b>Tejas Dining Room</b>
1:45	School Adjourns