



2021 SALT BASICS SCHOOL
December 5-10, 2021
Atlanta, Georgia

(draft 08/03/21)

Sunday, December 5, 2021			
All Tracks			
5:00 – 8:00 p.m.	Registration/Dinner/Networking		
7:15 – 8:00 p.m.	COST Events App Orientation Don't forget to bring your laptop or personal device that you plan to use during the week.		
Monday, December 6, 2021			
All Tracks			
7:45 – 8:30	Introductions of Staff, Facilities and Format Doug Lindholm, COST President/Chief Executive Officer, Washington, DC Robert Tuinstra, COST Chair, Corteva Agriscience, Wilmington, DE Charles Drury, COST Vice-President/Chief Operating Officer, Washington, DC		
8:30 – 11:00	State and Local Practice Overview <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. This session will also cover a <i>brief</i> discussion of jurisdiction and nexus. <u>Instructors:</u> Gerry Amoroso, Grant Thornton*, Austin, TX Harley Duncan, KPMG*, Washington, DC Arthur Parham, Entergy Services, Inc., Woodlands, TX TBD		
9:30– 9:45	Refreshment & Networking Break		
11:00 –12:30	Financial Statements - Issues for the State Tax Professional – <u>Curriculum:</u> Overview of tax accounting for above and below the line financial statement presentations and their impact on and relationship to state tax return preparation. <u>Instructors:</u> Kelly Smith, PwC*, Atlanta, GA TBD		
12:30 – 1:30	Lunch		
Income and SALT Tracks		Sales Track	
1:30 – 3:15	Basic Unitary/Filing Methods – <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	1:30 – 5:30	Jurisdiction to Tax – <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 Christopher Lutz, Horwood Marcus & Berk*, Chicago, IL Scott Peterson, Avalara*, Nashville, TN
3:15 – 3:30	Refreshment & Networking Break		
3:30 – 5:30	State Income Tax Base I –		

4:45 – 5:30	<p>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.</p> <p>Instructors: Susan Ferlianto, Deloitte*, Atlanta, GA Cari Sorsa, Deloitte*, Atlanta, GA</p>	2:15 – 3:15 3:15 – 3:30 4:30 – 5:30	Facilitated Breakout Refreshment & Networking Break Facilitated Breakout
6:15 – 9:00	Vegas Night with COST		
Tuesday, December 7, 2021			
Income Tax Track		Sales Tax Track and SALT Track	
8:00 – 12:00	<p>State Income Tax Admin. & Compliance – Curriculum: Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements.</p> <p>Instructors: Susan Courson-Smith, Pfizer, Memphis, TN Jonathan Mieritz, Corteva Agriscience, Wilmington, DE Arthur Parham, Entergy Services Inc., Winter Park, FL Frances Sewell, Pfizer, Memphis, TN Patrick Waldo, Nationwide, Columbus, OH Michael Woo, Retired, San Ramon, CA</p>	8:00 – 10:00	<p>Introduction to Sales Tax Theory/Definition of Key Terms – Curriculum: Review history, theory and policy underlying sales taxation; define key terms and concepts used to implement the tax.</p> <p>Instructors: Kathy Saxton, Deloitte*, Atlanta, GA Liudmila Wilhelm, Deloitte*, Atlanta, GA</p>
10:00 – 10:15	Refreshment & Networking Break		
12:00 – 1:00	Lunch –	10:15 - 12:00	<p>Sales Tax Base, Taxability and Characterization - 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.</p> <p>Instructors: Scott Jackson, KPMG*, Atlanta, GA Thomas Lopez, KPMG*, Atlanta, GA</p>
1:00 – 5:15	<p>State Income Tax Admin. & Compliance (cont'd.) – Curriculum: Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements.</p>	12:00– 1:00	Lunch –
2:45 – 3:00	Refreshment & Networking Break	1:00 – 2:45	<p>Sales Tax Base, Taxability and Characterization (cont'd) – 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.</p>
		1:45 –2:45	Facilitated Breakout
		2:45 –3:00	Refreshment & Networking Break

		3:00 – 5:30	Sales Tax - Exempt and Non-Taxable Transactions – Curriculum: Examine entity-level and activity-related exemptions; use of exemption certificates, and transactions outside scope of the statute. Instructors: Jeff Lemmons, PwC*, Dallas, TX Brian Tan, PwC*, Dallas, TX		
6:30 – 9:30	Optional Evening Outing				
Wednesday, December 8, 2021					
Income Tax Track		Sales Tax Track and SALT Track			
8:00 – 12:00	State Income Tax Admin. & Compliance (cont'd.) – Curriculum: Review of income tax filing requirements, including software, form instructions vs. law, estimated payments, RARs, amended returns, mailing requirements. Instructors: Susan Courson-Smith, Pfizer, Memphis, TN Jonathan Mieritz, Corveva Agriscience, Wilmington, DE Arthur Parham, Entergy Services Inc., Winter Park, FL Frances Sewell, Pfizer, Memphis, TN Patrick Waldo, Nationwide, Columbus, OH Michael Woo, Retired, San Ramon, CA	8:00 – 11:15	Sales Tax – Situsing – Curriculum: 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. Instructors: Karen Currie, EY*, Dallas, TX TBD		
		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 – Curriculum: An overview of other methods of taxation that states are using to impose tax. Instructor: James Adams, EY*, Atlanta, GA	11:15 – 12:00	Property Taxes – Curriculum: An overview of property taxation and the various methods of valuation and imposition. Instructor: Fred Nicely, COST, Washington, DC
12:00 – 1:00	Lunch –	12:15– 1:15	Lunch –	12:00 – 1:00	Lunch –
1:00 – 2:30	State Income Tax Admin. & Compliance (REVIEW) – Curriculum: 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 – 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. Instructors: Amee Appel, PwC*, Chicago, IL Carolynn Kranz, Industry Sales Solutions*, Washington, DC Diane Yetter, YETTER*, Chicago, IL	1:00 – 2:30	Legislation – Curriculum: A session that will cover the basics of legislation and how it can be used to benefit the taxpayer. Instructors: Aziza Farooki, COST, Washington, DC TBA
2:30 – 3:30	Gross Receipts and Net Worth Taxes – Curriculum: An overview of other methods of taxation that states are using to impose tax.			2:30 – 3:30	Gross Receipts and Net Worth Taxes –

	<u>Instructor:</u> James Adams, EY*, Atlanta, GA				<u>Curriculum:</u> An overview of other methods of taxation that states are using to impose tax. <u>Instructor:</u> James Adams, EY*, Atlanta, GA
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3:30 **Session adjournment for the Day!!**

3:30 **Evening On Your Own**

Thursday, December 9, 2021

Income Tax Track	Sales Tax Track	SALT Track
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8:00 – 10:00 Unitary Business Principle & Apportionment – <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) – <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> Ameer Appel, PwC*, Chicago, IL Carolynn Kranz, Industry Sales Solutions*, Washington, DC Diane Yetter, YETTER*, Chicago, IL	8:00 – 10:00 Unitary Business Principle & Apportionment – <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
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10:00 – 10:15 Refreshment & Networking Break	10:00– 10:15 Refreshment & Networking Break	10:00 – 10:15 Refreshment & Networking Break
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10:15 – 12:00 Restrictions on A State's Ability to Tax – <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, Blank Rome*, New York, NY Andres Vallejo, Vallejo, Antolin, Agarwal & Kanter*, San Francisco, CA	10:15 – 12:00 Restrictions on A State's Ability to Tax – <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, Blank Rome*, New York, NY Andres Vallejo, Vallejo, Antolin, Agarwal & Kanter*, San Francisco, CA
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12:00 – 1:00 Lunch –	12:00 – 1:00 Lunch –	12:00 – 1:00 Lunch –
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1:00 – 4:00 State Income Tax Base II – <u>Curriculum:</u> In-depth focus on apportionment formula variations, special issues in apportionment, sourcing services & intangible	1:00 – 5:30 Sales & Use Tax -Administration & Compliance (cont'd.) – <u>Curriculum:</u> Review of vital issues	1:00 – 4:00 State Income Tax Base II – <u>Curriculum:</u> In-depth focus on apportionment formula variations, special issues in apportionment, sourcing services
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3:00 – 3:15	income; detailed analysis of tax base additions & subtractions, multinational issues & credits. <u>Instructors:</u> Greg Abbott, BDO*, Atlanta, GA TBD	3:00 – 3:15	associated with administration of the sales/use tax function, including: registration, exemption certificates, taxability decisions, software, return preparation, claims for refund.	3:00 – 3:15	& intangible income; detailed analysis of tax base additions & subtractions, multinational issues & credits. <u>Instructors:</u> Greg Abbott, BDO*, Atlanta, GA TBD
3:15 – 4:00	Refreshment & Networking Break Facilitated Breakout		Refreshment & Networking Break	3:15 – 4:00	Refreshment & Networking Break Facilitated Breakout
4:00 – 5:30	Pass-Through or Disregarded Entities – 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. <u>Instructors:</u> TBD, KPMG* Will Thistle, Bradley*, Birmingham, AL			4:00 – 5:30	Pass-Through or Disregarded Entities – 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. <u>Instructors:</u> TBD, KPMG* Will Thistle, Bradley*, Birmingham, AL,
6:30 – 8:30	Trivia and Game Night with COST – Join your fellow attendees for a night of trivia and fun at the Georgia Tech Conference Center. The fun will start at 6:30; trivia will start at 7:30 pm. Prizes will be given to the winning team.				

Friday, December 10, 2021

All Tracks

8:00 – 9:15	State Tax Research Tools – 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. <u>Instructors:</u> Matthew Mantle, Jones Walker, New Orleans, LA
9:15 – 10:15	Local Taxes – Curriculum: Survey of various local taxes, including gross receipts, sales/use, and business operating taxes, with discussion of best practices for compliance. <u>Instructors:</u> Nicole Crighton Vescio, KPMG*, New York NY Frank Gallo, Reed Smith*, Philadelphia, PA
10:15 – 10:45	Refreshment Break/Hotel Checkout
10:45 – 11:45	Evolving Unclaimed Property and VAT Issues – 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? <u>Instructors:</u> Patrick Reynolds, COST, Washington, DC TBD, KPMG*, Washington, DC

11:45 – 1:00	<p>Preparing for Audit Challenge & Controversy – <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. <u>Instructors:</u> Kelly Butler, Ryan*, Dallas, TX John Murphy, Kolesar & Associates, Reno, NV Daniel Stanley, Honigman*, Lansing, MI</p>
1:00	<p>Basics School Adjourns – Lunch is Available in the</p>