



Take the lead—Tax reform and fortifying state positions breakouts

Positioning for more favorable outcomes: Income and franchise tax controversies

In light of the many important state implications surrounding federal tax reform, this session will address how businesses may tactically position and manage their daily corporate operations in preparation for imminent state income tax audits and controversies to help avoid unnecessary costs, disruptions, and expensive litigation, as well as increase overall tax department efficiency. The panelists will discuss contemporaneous documentation policies to better substantiate your company's facts with respect to its state income tax filing positions. This session will also consider some potential opportunities available to businesses due to the recently enacted federal tax changes, as well as to those undergoing audit—including refunds and offsets—as well as effectively presenting the facts, handling requests for documents and interviews, negotiating settlements, and preparing for and managing post-assessment appeals.

Positioning for more favorable outcomes: Indirect tax controversies

As states increasingly implement far-reaching nexus policies and expanded tax bases, this session will discuss the practical aspects of proactively preparing for state indirect tax audits and assessments. The discussion will include leading practices for addressing day-to-day corporate operations and risk—including contemporaneous data collection and compliance responsibilities, technology considerations, sampling agreements, reverse audits, voluntary disclosure and/or amnesty agreements, and administrative ruling requests. The session will also focus on successfully managing ongoing indirect tax audits and the state-by-state nuances of administrative controversies—including how to better support and present your company's facts and circumstances—as well as potential opportunities for post-assessment refunds/offsets, and negotiating conciliation and settlement agreements.

Corporate governance perspectives on controversy

In confronting many of the practicalities surrounding federal tax reform and state tax controversies, sometimes the underlying “non-tax issues” dwarf the tax-related concerns within a business organization—especially in terms of considering a company's costs, core principles, industry, shareholders, and public perception. Panelists in this session will focus on such corporate governance issues involving tax matters, including government and industry regulations and/or limitations, as well as potential opportunities to form and build taxpayer or trade-group coalitions in an era where state agencies are attempting to tax today's business concepts and realities with some arguably outdated tax statutes and regulations.

State tax implications of IRS controversies

This session will discuss why state tax professionals should be involved with federal income tax audits, controversies, and settlements, and what these federal tax outcomes could mean from a state perspective. Presenters will review recent federal decisions and consider their implications for state tax cases. Moreover, learn how your organization may avail itself of potential opportunities to offset tax due or enhance refunds at the state level. The session will also consider some recent developments, such as how states are responding to the recently enacted federal tax reforms, as well as changes in the federal partnership audit and adjustment process.