



“Mastering the art (and articulation) of state tax: Distilling the complex” breakouts

Tax transformation: The path forward for multistate tax function

With tax reform, the rise of the digital economy, migration to the cloud, re-examination of indirect tax post-*Wayfair*, and the changing global regulatory regime, today’s multistate tax environment presents an increasingly complex landscape for tax departments to navigate. This dynamic environment, the exploding volume of data, and increasing pressure for more real-time analysis, analytics, and tax reporting are prompting tax executives to explore ways to transform their tax departments and meet these challenges. In this session, the speakers will address some ways in which tax departments are leveraging emerging technologies to more efficiently bring greater transparency and visualization to vast amounts of data, improve state tax planning, and meet growing intricate state tax compliance requirements—including ways to bring together tax professionals and automation to amplify their collective capabilities and cultivate needed talent and skills for the digital future.

State corporate income tax complexities post-Tax Cuts and Jobs Act

This session will explore some state corporate income tax compliance issues and potential planning considerations in light of select provisions of the federal Tax Cuts and Jobs Act (TCJA) and accompanying administrative guidance, including IRC §163(j) interest expense limitations and debt-related considerations; global intangible low-taxed income (GILTI) and the taxation of foreign source income; and the deduction for foreign-derived intangible income (FDII). The speakers will address underlying factor representation considerations; nuanced state coupling, decoupling, and other tax-base related issues; and state filing groups and other methodologies. Learn how your business may navigate the maze of ongoing and evolving complexities post-TCJA, including tips on distilling and articulating these issues for the nontax business leaders in your organization, as well as how to better support and document your return positions along the way.

State indirect tax complexities post-*Wayfair*

This panel of indirect tax specialists will explore the varying state and local tax responses to *Wayfair* and touch on related roles of Congress and the Streamlined Sales Tax Governing Board. From a practical standpoint, the panel will discuss how *Wayfair* not only impacts some retailers and e-commerce, but also businesses selling SaaS, cloud, and digital goods/services to end users, including inbound companies with no U.S. permanent

establishment that sell into the country. The session will focus on day-to-day considerations for related tax compliance, such as how internal IT systems, business models, and processes may be impacted—as well as emerging issues over required recordkeeping, audit exposure, and liability protections and determining who is the “retailer” and “responsible party” in a transaction. The speakers also will consider how to articulate these issues to the nontax business leaders in your company.

State tax controversies: A closer look at administrative interpretations

In today’s transformed tax environment with its multitude of “open issues,” corporate tax departments nonetheless must move forward despite the lack of formal state guidance in many instances. However, even in situations where state taxing authorities have taken positions on tax law, how much deference should these interpretations be given, and under what circumstances? This session will consider whether federal principles of administrative agency deference apply to state tax audits and controversies. The session also will consider 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; moreover, learn how your business may benefit from potential related opportunities to offset tax due or enhance refunds at the state level, as well as apprise your nontax leaders about the subject overall.