



INTERMEDIATE CORPORATE TAX COMPLIANCE

For experienced tax professionals looking to deepen their understanding of complex compliance considerations within the tax function, the **Intermediate Corporate Tax Compliance** program will take a detailed look into several key areas of focus, including consolidated returns, tax credits, tax controversy, and indirect tax issues. Participants will learn how pass-through entity reporting requirements differ from those applicable to corporations, and they will explore numerous technical issues the tax department faces related to business development and planning. The program will also cover the impacts of international operations, including information reporting, disclosures and elections, foreign tax credits, and transfer pricing considerations.



WHO IS THIS PROGRAM FOR?

- Experienced tax department team members with return review responsibilities.
- Professionals seeking to deepen their understanding of more complex tax compliance technical and reporting issues, business development, planning, reporting, and tax controversy matters.
- Tax and accounting department professionals with responsibility for non-income-based taxes.

DURATION

1 Course | 10 Bi-Weekly Classes
75 Minutes Each | 15 CPEs

PROGRAM FEE

\$3,000 USD Per Participant
Discounts available for multiple participants.



HOW TO REGISTER

Scan the QR code to view full program details and register for an upcoming session. For questions regarding the program, including registration, contact gti@gtmtax.com or call (484) 395-4048.

PROGRAM CLASSES

1. Consolidated Returns

This class will offer a comprehensive exploration of the consolidated return area. It will include an in-depth discussion of attribution rules and cover various types of related party transactions. Topics will encompass an overview of highly technical regulations, along with the practical aspects of short-period returns and elections.

2. Overview of Pass-Through Entities

This class highlights the differences between corporations and pass-through entities, such as partnerships and S-corporations. It will provide an overview of the reporting requirements and how they compare to corporate reporting. Participants will gain an understanding of the tax consequences of contributions and distributions, as well as an understanding of the flow-through concept.

3. Tax Controversy

This class provides participants with an understanding of LB&I Active Campaigns (the successor to the Coordinated Issues). It will offer an overview of various options available to taxpayers, including Fast Track Settlements, the Compliance Assurance Process (CAP Program), Competent Authority, the Private Letter Ruling (PLR) process, and more. Additionally, this class will cover best practices regarding audit procedures and the appeals process.

4. Tax Credits

This class will offer an overview of many commonly claimed tax credits, including the Research and Development (R&D) credit, as well as various recently enacted energy-related tax credits. It will also include a discussion of the impact of the Section 174 research capitalization requirement on the R&D tax credit.

5. Business Development & Planning - Part 1

This class will survey various topics commonly encountered in corporate business development and planning. These include: structuring as stock vs. asset acquisitions; the consequences of contingent consideration; installment sale treatment when payments extend beyond one tax year; bankruptcy and debt restructuring; the treatment of casualty losses and disaster situations; and like-kind exchanges. Additionally, the class will discuss what disclosures need to be made in the various scenarios.

6. Business Development & Planning - Part 2

This class will discuss the various steps in the business development process and the tax department's role in those steps. It will cover best practices in the due diligence process, understanding the opening day Balance Sheet (ODBS), classifying transaction costs, the potential limitations on tax attributes, and considerations regarding the integration of business operations.

7. Tax Planning

Participants will be introduced to various tax-free reorganizations. The class will also provide an overview of the check-the-box regulations. Additionally, discussions will cover the process and tax ramifications of establishing and liquidating corporations. Transfers to foreign corporations and the use of Gain Recognition Agreements (GRA) will also be included in the class.

8. International Topics - Part 1

This class will provide an overview of the foreign tax credit (FTC) regime and considerations. It will also cover the concept of transfer pricing (TP), available methods, and potential challenges encountered in determining and defending TP positions.

9. International Topics - Part 2

This class will cover the information reporting requirements for various structures of international operations focusing on Forms 5471, 5472, and 8858. Discussions will include best practices in information gathering and reporting.

10. SALT Taxes Beyond Income & Franchise Taxes

This class will provide an overview of some of the taxes that businesses incur in the state and local area, in addition to income and franchise taxes. These include Sales & Use Tax (SUT), Gross Receipts Tax, and Property Tax. Additionally, the class will discuss the application of technology and automation to these non-income-based taxes.