

# ADVANCED STATE INCOME TAX SCHOOL

George Mason University  
The Mason Inn Conference Center & Hotel  
Fairfax, Virginia  
June 5 - 10, 2011



This school is a thorough, five-day program that examines in-depth the more complex problems those responsible for state income taxes face, including nexus and entity concerns, separate and consolidated/combined return issues, apportionment complexities, reorganizations and mergers, tax planning nuances, FIN 48 and more.

The Institute, founded in 1976, is a 501(c)(3) non-profit educational association serving over 4500 members who represent approximately 1450 corporations, firms, or taxpayers throughout the United States and Canada. It is the only professional organization that educates, certifies and establishes strict codes of conduct for state and local income, property and sales & use tax professionals who represent taxpayers. (government officials or organizations do not qualify for membership).

INSTITUTE FOR PROFESSIONALS IN TAXATION

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# ADVANCED STATE INCOME TAX SCHOOL

## SUNDAY, June 5, 2011

4:00 pm - 6:30 pm      Registration

6:30 pm                  Welcome Reception/Dinner

## MONDAY, June 6, 2011

8:00 am - 8:30 am      Opening

Welcome - IPT President  
**Robert D. Butterbaugh, CMI**  
 Senior Manager, State & Local Taxes  
 Ernst & Young LLP  
 Philadelphia, PA

8:30 am - 9:45 am

General Session

### **Overview of Constitutional Clauses Used in Defense of SALT**

*This session will arm you with an expert-level view of the constitutional issues that impact state and local taxation -- the tools needed to know when and how to challenge a suspect tax. The session will include an in-depth analysis of the Due Process and Commerce Clause restrictions on state taxing powers with emphasis on the current developments under the four-prong test of Complete Auto. The parameters of the prohibition on discrimination against interstate commerce and restrictions on credits and incentives will also be covered.*

Learning Objectives

- ▶ Understand the numerous constitutional provisions that may impact state taxation
- ▶ Learn to identify constitutional issues such as unfair apportionment, discrimination, and general due process issues

Instructor:

**David J. Shipley, CMI, Esq.**  
 Partner  
 McCarter & English, LLP  
 Philadelphia, PA

9:45 am - 10:00 am      Break

10:00 am - 12 noon      General Session  
**Nonbusiness Income**

# ADVANCED STATE INCOME TAX SCHOOL

MONDAY, June 6, 2011 - continued

*This presentation will explore the distinction between business and non-business income by reviewing the decisions of various state courts regarding the treatment of specific types of income. This presentation also will focus on the sourcing rules for allocating nonbusiness income. Additionally, this presentation will review various state-specific allocation rules for sourcing certain types of income.*

## Learning Objectives

- ▶ Understand the effect of characterizing income as business income or nonbusiness income
- ▶ Explain the transactional and functional tests for determining whether income is business or nonbusiness income
- ▶ Understand the basis for and effect of the liquidation exception to the functional test
- ▶ Recognize the effect of non-uniform definitions of business and non-business income
- ▶ Analyze different fact patterns and determine if the resulting income is business income or nonbusiness income under the various statutes, regulations and cases
- ▶ Understand and apply UDITPA nonbusiness income allocation rules
- ▶ Recognize existence of areas outside of nonbusiness income where states may directly allocate income

Instructors:

**Kimberley M. Reeder, Esq.**

Partner

Morgan, Lewis & Bockius LLP

Palo Alto, CA

**David J. Shipley, CMI, Esq.**

Partner

McCarter & English, LLP

Philadelphia, PA

12:00 pm - 1:00pm

Lunch

1:00 pm - 2:45 pm

General Session

## **Unitary Business**

*This session will review the United States Supreme Court's decisions that developed the unitary business principle and the various tests used to determine what constitutes a unitary business. Additionally, this presentation will discuss the treatment in separate-company states of income*

# ADVANCED STATE INCOME TAX SCHOOL

## MONDAY, June 6, 2011 - continued

*derived from non-unitary business activities as well as income derived from non-unitary affiliates. This session also will discuss the implications of being part of a unitary business in unitary combined reporting states.*

### Learning Objectives

- ▶ Understand the evolution of unitary business concept
- ▶ Recognize and understand cases attempting to exclude nonunitary income from tax
- ▶ Identify and apply the three tests for determining the existence of a unitary business
- ▶ Explain the difference between operational and investment income and identify when the operational function test should be applied
- ▶ Understand the application of the unitary business principle in separate company states
- ▶ Understand the various state statutory definitions of a unitary business

### Instructors:

**John M. Allan, Esq.**

Partner  
Jones Day  
Atlanta, GA

**David J. Shipley, CMI, Esq.**

Partner  
McCarter & English, LLP  
Philadelphia, PA

2:45 pm - 3:00 pm      Break

3:00 pm - 5:00 pm      **Case Study—Unitary Business**

## TUESDAY, June 7, 2011

7:45 am - 8:00 am      Opening

8:00 am - 8:30 am      Quiz

8:30 am - 9:00 am      Quiz Review

9:00 am - 10:00 am    General Session  
**Entities Subject To Tax**

*This session will examine the various forms of business organizations:*

# ADVANCED STATE INCOME TAX SCHOOL

**TUESDAY, June 7, 2011 - continued**

*how they are taxed and why it makes a difference. The focus will be on choosing the right entity form for the business from the state and local income/franchise tax perspective. There will be consideration of pitfalls as well as planning opportunities available.*

## Learning Objectives

- ▶ Distinguish between an entity's legal classification and its federal/state income tax classification
- ▶ Evaluate the impact of an entity's federal/state income tax classification on the taxability and tax liability of the entity and its owners
- ▶ Identify state specific considerations that relate to and/or result from an entity's tax classification (e.g., nexus, apportionment, withholding, etc.)

## Instructors:

**John M. Allan, Esq.**

Partner  
Jones Day  
Atlanta, GA

**Kimberley M. Reeder, Esq.**

Partner  
Morgan, Lewis & Bockius LLP  
Palo Alto, CA

10:00 am - 10:15 am Break

10:15 am - 12 noon General Sessions

## **Tax Planning**

*No matter what your position, it is critical that you be equipped to evaluate the state and local tax concerns in any proposed tax planning (whether being done for federal or for state purposes) or any proposed restructuring of your business. This session will also explore the growing importance of having business purpose and economic substance from a state and local tax perspective.*

## Learning Objectives

- ▶ Understand the state tax considerations of corporate/entity reorganizations
- ▶ Understand and be able to identify restructuring options that lead to a more tax efficient outcome
- ▶ Understand business purpose and economic substance concepts, and when to be concerned about them

# ADVANCED STATE INCOME TAX SCHOOL

TUESDAY, June 7, 2011

Instructors:

**Maureen Pechacek, CPA**

Partner

PricewaterhouseCoopers LLP

San Diego, CA

**Margaret C. Wilson, CMI, Esq.**

Partner

McDermott Will & Emery LLP

New York, NY

12:00 pm - 1:00 pm

Lunch

1:00 pm - 1:45 pm

Case Study - Tax Planning

1:45 pm - 2:45 pm

General Session

**Nexus and P.L. 86-272**

*This session will examine in detail the United States Supreme Court decisions discussing the "substantial nexus" standard of the Commerce Clause of the United States Constitution and how this standard has been interpreted and developed by various state courts. The discussion will include the development of economic nexus and attributional nexus concepts. Finally, we will examine federal statutory limitations on the states' ability to impose net income-based taxes on nonresident taxpayers pursuant to P.L. 86-272 and selected cases interpreting this limitation.*

Learning Objectives

- ▶ Understand the nuances of the "Substantial Nexus" standard of the commerce clause
- ▶ Recognize how this standard has been interpreted and developed by various state courts
- ▶ Discuss the concepts of economic nexus and attributional nexus
- ▶ Discern federal statutory limitations on the states' ability to impose net income –based taxes on nonresident taxpayers pursuant to P.L. 86-272 and other selected cases

Instructors:

**Paul A. Broman, Esq.**

State Tax Issues, Audits & Appeals

BP America

Houston, TX

# ADVANCED STATE INCOME TAX SCHOOL

## TUESDAY, June 7, 2011 - continued

**Margaret C. Wilson, CMI, Esq.**  
Partner  
McDermott Will & Emery LLP  
New York, NY

2:45 pm - 3:00 pm

Break

3:00 pm - 4:00 pm

General Session  
**Nexus and P.L. 86-272** (continued)

Instructors:

**Paul A. Broman, Esq.**  
State Tax Issues, Audits & Appeals  
BP America  
Houston, TX

**Margaret C. Wilson, CMI, Esq.**  
Partner  
McDermott Will & Emery LLP  
New York, NY

4:00 pm - 6:00 pm

General Session  
**Alternatives to Traditional Income Taxes**

*This session will look at why more states are adopting gross receipts taxes. The session will identify taxable entities and persons subject to gross receipts taxes and the differences in states' jurisdiction to impose gross receipts taxes. The instructors will explain typical elements in the gross receipts tax base, common exemptions, and reporting rules. The session will also review apportionment factor issues and discuss the major compliance issues for gross receipts taxes imposed in Washington, Michigan, Ohio and Texas.*

Learning Objectives

- ▶ Understand why states have adopted gross receipts taxes
- ▶ Identify the taxable entities and persons that are commonly subject to gross receipts taxes
- ▶ Specify why nexus is different for a gross receipts tax from other types of state taxes
- ▶ Understand nuances of what constitutes the gross receipts tax base
- ▶ Identify nuances of items exempted from the gross receipts tax base
- ▶ Identify nuances of gross receipts tax reporting options (e.g., combined, consolidated or separate)

# ADVANCED STATE INCOME TAX SCHOOL

## TUESDAY, June 7, 2011

- ▶ Understand apportionment factor rules
- ▶ Recognize the major credits for the gross receipts taxes in Washington, Ohio, Texas, and Michigan
- ▶ Discuss the major compliance issues for the gross receipts taxes in Washington, Ohio, Texas, and Michigan
- ▶ Identify issues related to the financial statement treatment of gross receipts taxes

Instructors:

**Gregg D. Barton, Esq.**

Partner  
Perkins Coie LLP  
Seattle, WA

**Paul A. Broman, Esq.**

State Tax Issues, Audits & Appeals  
BP America Inc.  
Houston, TX

**Lynn A. Gandhi, Esq., CPA**

Partner  
Honigman Miller Schwartz and Cohn LLP  
Detroit, MI

## WEDNESDAY, June 8, 2011

8:15 am - 8:30 am      Opening

8:30 am - 10:30 am    General Session

**Advanced Return Methodologies and Mechanics**

*Implications of separate, consolidated and combined state income tax returns differences, including discussion of the mechanics and implications of each, the income and apportion factors used, the effect on inter-company transactions and treatment of tax attributes.*

Learning Objectives

- ▶ Explain which entities are typically included in the different types of returns
- ▶ Appreciate the distinctions between a full consolidated return versus a nexus consolidated return
- ▶ Recognize the difference between the states authority to require combination versus a taxpayers ability to elect combination



# ADVANCED STATE INCOME TAX SCHOOL

WEDNESDAY, June 8, 2011 - continued

- ▶ Recognize the difference in the treatment of intercompany transactions under different return types

Instructors:

**Mark L. Nachbar, Esq., CPA**

Principal

Ryan

Downers Grove, IL

**Ellen McCabe, CPA**

Partner

Ernst & Young LLP

Cleveland, OH

10:30 am - 10:45 am Break

10:45 am - 12 noon General Session

**M&A**

*Acquisitions, mergers and reorganizations can take many different forms, and each can have significant state and local tax implications. This session will explore the various types of transactions used to buy and sell businesses and examine the state tax issues inherent in such deals. The session will also review typical provisions in acquisition agreements with an analysis emphasizing the consequences for state income taxes, as well as sales and property taxes.*

Learning Objectives

- ▶ Understand the state tax principles of mergers and acquisitions
- ▶ Understand specific state income tax considerations of reorganizations, for both buyer and seller
- ▶ Understand provisions of an acquisition agreement and the relevant importance in a transaction

Instructors:

**John P. Barrie, Esq.**

Partner

Bryan Cave LLP

Washington, DC

**Margaret C. Wilson, CMI, Esq.**

Partner

McDermott Will & Emery LLP

New York, NY

# ADVANCED STATE INCOME TAX SCHOOL

## WEDNESDAY, June 8, 2011 - continued

12:00 pm - 1:00 pm      Lunch

1:00 pm - 2:00 pm      General Session  
**M&A** (continued)

Instructors:

**John P. Barrie, Esq.**

Partner

Bryan Cave LLP

Washington, DC

**Margaret C. Wilson, CMI, Esq.**

Partner

McDermott Will & Emery LLP

New York, NY

2:00 pm - 2:45 pm      General Session  
**FAS 5/FIN 48**

*A review of the requirements of FIN 48, relating to accounting for uncertainty in income taxes, with examples of how the rules apply in practice with respect to uncertain state tax positions, including nexus and related party transaction reporting (or non-reporting) positions.*

Learning Objectives

▶ Understand the FASB Interpretation Number 48

▶ Understand how to apply the FIN 48 criteria to state income taxes

Instructors:

**John M. Allan, Esq.**

Partner

Jones Day

Atlanta, GA

**Linda A. Klang, Esq.**

Vice-President Taxes

Lehman Brothers Holdings, Inc.

Jersey City, NJ

2:45 pm - 3:00 pm      Break

3:00 pm - 4:15 pm      General Session  
**FAS 5/FIN 48** (continued)

# ADVANCED STATE INCOME TAX SCHOOL

## WEDNESDAY, June 8, 2011 - continued

Instructors:

**John M. Allan, Esq.**

Partner

Jones Day

Atlanta, GA

**Linda A. Klang, Esq.**

Vice-President Taxes

Lehman Brothers Holdings, Inc.

Jersey City, NJ

4:15 pm - 5:00 pm

General Session

### **Mechanics of FIN 48 Computations**

*Explore more of the nuances of FIN 48 by working through practical applications of it. Mastering the computational aspects of FIN 48.*

- ▶ Improve upon technical ability to apply FIN 48 to situations faced in practice.

Instructors:

**John M. Allan, Esq.**

Partner

Jones Day

Atlanta, GA

## THURSDAY, June 9, 2011

7:45 am - 8:00 am

Opening

8:00 am - 8:30 am

Quiz

8:30 am - 10:15 am

General Session

### **Apportionment**

*This session discusses the major issues pertaining to apportionment. The management of a taxpayer's property, payroll and sales factors can give a taxpayer some discretion over their apportionment profile and, to some extent, which state(s) it will pay tax in. In some cases, state law may contain certain unique and beneficial rules for constructing the traditional apportionment formulas or permit favorable alternative apportionment. In other cases, "nowhere" factors can be created by having amounts in the denominator of a factor which are not included in any state numerators. These issues, as well as efforts by states to modify a taxpayer's factors--through throwout and throwback statutes, for example--will be discussed.*

# ADVANCED STATE INCOME TAX SCHOOL

**THURSDAY, June 9, 2011 - continued**

## Learning Objectives

### Units 1 and 2

- ▶ Understand the growing trend away from an evenly weighted three-factor formula
- ▶ Recognize unique rules for sourcing from services, intangibles, and capital assets
- ▶ Understand the difference between sourcing receipts costs of performance and market approaches
- ▶ Recognize the rationale for a state's inclusion of net receipts, as opposed to gross receipts, from sales of treasury function investments in the sales factor
- ▶ Recognize some of the gray areas in characterizing income for sales factor purposes
- ▶ Discuss the different methods used to value property for property factor purposes
- ▶ Understand the property factor treatment of rented property, property in transit, moveable property and leased property
- ▶ Understand what compensation is included in a state's payroll factor
- ▶ Discuss the concept of payroll attribution

### Unit 3

- ▶ Appreciate the risk of being denied the right to apportion
- ▶ Define the "ultimate destination" rule
- ▶ Describe the "throwback rule" and when it applies
- ▶ Define the "Joyce" rule and when it applies
- ▶ Define the "Finnegan" rule and when it applies
- ▶ Describe the "double throwback rule" and when it applies
- ▶ Describe the "throwout rule" and when it applies
- ▶ Define a "dock sale" and its potential implication on sales factor apportionment

### Unit 4

- ▶ Identify the major constitutional issues related to the apportionment of income, including the issues related to the Due Process Clause and Commerce Clause
- ▶ Address the ability of a taxpayer to request a change or modification of a statutory apportionment factor and what information may influence the state to grant such a modification
- ▶ Understand the state taxing authorities' powers to modify a taxpayer's apportionment factor and how the state may apply these powers

Instructors:

# ADVANCED STATE INCOME TAX SCHOOL

## THURSDAY, June 9, 2011 - continued

**Duane W. Dobson, Jr., CMI, CPA**  
 Director - State and Local Tax  
 Grant Thornton LLP  
 McLean, VA

**Giles B. Sutton, Esq.**  
 Partner  
 Grant Thornton LLP  
 Charlotte, NC

10:15 am - 10:30 am

Break

10:30 am - 12:00 pm

General Session  
**Apportionment** (continued)

Instructor:  
**Giles B. Sutton, Esq.**  
 Partner  
 Grant Thornton LLP  
 Charlotte, NC

12:00 pm - 1:00 pm

Lunch

1:00 pm - 2:15 pm

**Case Study - Apportionment**

2:15 pm - 3:30 pm

General Session  
**Federal Audit Adjustments**

*Amending state returns pursuant to federal changes can be a daunting task, and one in which taxpayers frequently seek advice. In particular, issues such as when a final federal determination has been made for state reporting purposes and what items are open for adjustment of state returns can involve state-specific research. This session of the school highlights several issues that practitioners should be aware of when companies report federal income tax adjustments for state purposes.*

Learning Objectives

- ▶ Understand the federal post-audit settlement process
- ▶ Define a “final federal determination”: for state reporting purposes

Instructor:  
**Giles B. Sutton, Esq.**  
 Partner  
 Grant Thornton LLP  
 Charlotte, NC

# ADVANCED STATE INCOME TAX SCHOOL

## THURSDAY, June 9, 2011 - continued

3:30 pm - 3:45 pm      Break

3:45 pm - 5:00 pm      General Session

### **Issues Related to Net Operating Losses**

*This session will focus on the issues related to the calculation and utilization of state net operating losses (NOLs). The session will address differences in the calculation of NOLs (e.g., some states calculate NOLs on a pre-apportionment basis and others calculate NOLs on a post-apportionment basis), issues related to the utilization of NOLs (e.g., the ability to carryforward or carryback NOLs), and the measurement and recognition of NOLs for financial statement purposes. We will also discuss related issues such as capital loss carryforwards and the interaction of alternative minimum tax calculations with NOL utilization.*

#### Learning Objectives

- ▶ Understand the issues and methodologies related to the states' calculation of net operating loss carryforwards (NOLs)
- ▶ Determine the potential utilization of NOLs, including when a taxpayer may carryback or carryforward an NOL and when the states limit the ability to carryback or carryforward the NOL
- ▶ Apply the information to situations where taxpayers must address the correct reporting of state NOLs for tax compliance and financial reporting purposes

Instructor:

**Duane W. Dobson, Jr., CMI, CPA**

Director - State and Local Tax

Grant Thornton LLP

McLean, VA

## FRIDAY, June 10, 2011

7:45 am - 8:00 am      Opening

8:00 am - 9:00 am      General Session

### **MTC/UDITPA**

*A history of the origin and growth of the Multistate Tax Commission, including in-depth discussion of the origins of UDITPA and the current efforts to rewrite its provisions. Students will also gain an understanding of the audit, uniformity and lobbying efforts currently being undertaken by the Commission.*

# ADVANCED STATE INCOME TAX SCHOOL

## FRIDAY, June 10, 2011 - continued

### Learning Objectives

- ▶ Understand how the Multistate Tax Commission was formed and how it maintains authority
- ▶ Recognize the authority of the Multistate Tax Commission, its audit program and its uniformity program
- ▶ Understand the origins and basic provisions of the Uniform Division of Income for Tax Purposes Act
- ▶ Understand the controversy surrounding the current proposal to revise UDITPA

### Instructors:

**Shirley K. Sicilian, Esq.**

General Counsel  
Multistate Tax Commission  
Washington, DC

9:00 am - 10:00 am

General Session

### **10 Best/Worst Audit and Appeal Practices**

*In this session, students will hear many entertaining examples of best and worst practices in the state and local income tax audit and appeal process as well as walk away with real-world advice on how to handle several specific situations.*

### Learning Objectives

- ▶ Evaluate the pros and cons of a particular practice and determine when it should be implemented
- ▶ Recall and apply best practices to specific examples
- ▶ Understand penalty concerns related to practice choices
- ▶ Recognize the need for flexibility in implementing best practices

### Instructors:

**John M. Allan, Esq.**

Partner  
Jones Day  
Atlanta, GA

**Patrick J. Reynolds, Esq., CPA**

Senior Tax Counsel  
J. C. Penney Company, Inc.  
Plano, TX

10:00 am - 10:15 am Break

# ADVANCED STATE INCOME TAX SCHOOL

## FRIDAY, June 10, 2011 - continued

10:15 am - 11:15 am    General Session  
**10 Best/Worst Audit and Appeal Practices** (continued)

Instructors:

**John M. Allan, Esq.**

Partner

Jones Day

Atlanta, GA

**Patrick J. Reynolds, Esq., CPA**

Senior Tax Counsel

J. C. Penney Company, Inc.

Plano, TX

11:15 am - 12:15 pm    General Session

### **Ethics**

*Unethical conduct on the part of sports and entertainment celebrities, government officials and business leaders continues to make headlines. Violations affect not just the offending individual, but families, colleagues, employers, clients and the profession at large. The publication and enforcement of a Code of Ethics is central to IPT's mission as an organization promoting the integrity of the SALT profession and the members of the public who use our services. This session examines the provisions of the IPT Code in the context of real-life scenarios with which state and local tax professionals are confronted. Emphasis is given to recent amendments to the Code and a discussion is included of the procedures followed when a complaint is filed.*

Learning Objectives:

- ▶ Develop an understanding of the role of ethical canons in the SALT profession
- ▶ Become familiar with the IPT Code of Ethics
- ▶ Learn the procedures for reporting and responding to complaints alleging a violation of the IPT Code

Instructor:

**Cass D. Vickers, CMI, Esq.**

Deputy Executive Director and State Tax Counsel

Institute for Professionals in Taxation

Atlanta, GA

12:15 pm - 12:45 pm    Quiz



# ADVANCED STATE INCOME TAX SCHOOL

## PROGRAM COMMITTEE and FACULTY

### **John M. Allan, Esq.**

Partner  
Jones Day  
Atlanta, GA

### **John P. Barrie, Esq.**

Partner  
Bryan Cave LLP  
Washington, DC

### **Gregg D. Barton, Esq.**

Partner  
Perkins Coie LLP  
Seattle, WA

### **Paul A. Broman, Esq.**

State Tax Issues, Audits & Appeals  
BP America Inc.  
Houston, TX

### **Duane W. Dobson, Jr., CMI, CPA - Co Chair**

Director - State and Local Tax  
Grant Thornton LLP  
McLean, VA

### **Lynn A. Gandhi, Esq., CPA**

Partner  
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Detroit, MI

### **Linda A. Klang, Esq.**

Vice-President Taxes  
Lehman Brothers Holdings, Inc.  
Jersey City, NJ

### **Ellen McCabe, CPA**

Partner  
Ernst & Young LLP  
Cleveland, OH

### **Mark L. Nachbar, Esq., CPA**

Principal  
Ryan  
Downers Grove, IL

### **Maureen Pechacek, CPA**

Partner  
PricewaterhouseCoopers LLP  
San Diego, CA

### **Kimberley M. Reeder, Esq.**

Partner  
Morgan, Lewis & Bockius LLP  
Palo Alto, CA

### **Patrick J. Reynolds, Esq., CPA**

Senior Tax Counsel  
J. C. Penney Company, Inc.  
Plano, TX

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McCarter & English, LLP  
Philadelphia, PA

### **Shirley K. Sicilian, Esq.**

General Counsel  
Multistate Tax Commission  
Washington, DC

### **Giles B. Sutton, Esq.**

Partner  
Grant Thornton LLP  
Charlotte, NC 28244

### **Cass D. Vickers, CMI, Esq.**

Deputy Executive Director and  
State Tax Counsel  
Institute for Professionals in Taxation  
Tallahassee, FL

### **Margaret C. Wilson, CMI, Esq. - Co Chair**

Partner  
McDermott Will & Emery LLP  
New York, NY

# ADVANCED STATE INCOME TAX SCHOOL

## REGISTRATION INFORMATION

Registrations must be submitted in advance through the IPT office and are accepted on a first-received basis. Enrollment is limited to IPT members or employees of companies who have members in IPT. **PLEASE NOTE:** If a faxed application, received by IPT, is accepted (acceptance letters will be sent), and the person declines the acceptance, there will be a \$100 cancellation fee imposed. There will also be a substitution fee if someone other than the original applicant attends.

In order to encourage early registration, a discount of \$25.00 is available to those who register on or before May 6, 2011. The fees (U.S. funds) are:

### Payments received on or before May 6, 2011\*:

\$775 (Individual personally holds membership in IPT)

\$975 (Individual does not hold membership, but company/firm has members in IPT)

### Payments received after May 6, 2011\*:

\$800 (Individual personally holds membership in IPT)

\$1,000 (Individual does not hold membership, but company/firm has members in IPT)

\*For any payment received after May 6, 2011, the \$25.00 discount does not apply. This includes faxed registration forms received without payment prior to this date.

If the registrant so elects, he/she may join as an Associate Member (company already has members) for annual dues payment of \$275\* (nonrefundable), and will be eligible for the reduced school fee of \$775. Please see registration form.

\*For individuals who have never held a membership in IPT, the associate dues will be \$138.00.

The following credit cards can be used: American Express, VISA and MasterCard. In order for credit card to be processed, it is important that the information requested on the registration form is filled out completely. Make check payable to: Institute for Professionals in Taxation and remit to: 1200 Abernathy Road, N.E., Building 600, Suite L-2, Atlanta, GA 30328.

### Cancellation/Substitution Policy

Refunds, subject to a cancellation charge of \$100, will be made upon written notification of cancellations received on or before May 20, 2011. There is also a substitution charge of \$40 on or before May 6, 2011, \$50 after that date. For more information regarding administrative policies such as complaint and refund, please contact our office at 404.240.2300.

## ACCOMMODATIONS

Registrants for this program are expected to reside at the The Mason Inn Conference Center and Hotel. Reservations may be made by calling the Reservation office at 703/865-5705 reference the Tax School room block or online at <https://reservations.ihotelier.com/onescreenGroup.cfm?hotelID=73874>. Booking code: Tax School. Reservations should be made with the hotel by May 2, 2011 to ensure receiving the group rate. After this date, or once the room block is filled, reservations requested will be on a space available basis. The package rate for this program is \$1,175 plus tax (currently 9%) per person single occupancy or double occupancy. Package includes: Dinner on Sunday - Thursday nights; 5 nights lodging (Sunday-Thursday); breakfast Monday - Friday; Lunch Monday - Thursday. Check-in time is 3:00 pm and check-out time is 12:00 pm. The hotel accepts cash, major credit cards, or travelers checks. In order to guarantee a reservation, a deposit equivalent to one night's room and tax or the guarantee of the same by a major credit card is required. Please check with the hotel regarding their cancellation policy.

There is a \$500.00 supplementary registration fee for local registrants not staying at the Mason Inn Conference Center and Hotel under IPT's group package.

**Classes** for the Advanced State Income Tax School are being held at the Mason Inn Conference Center and Hotel.

## THE MASON INN CONFERENCE CENTER & HOTEL

Nestled among a natural wooded setting on the southside of George Mason University campus is The Mason Inn. This Fairfax, Virginia hotel is designed to be a first-class venue hosting world-class conferences with an environment conducive to academic and business interactions. The Mason Inn embodies the ideas of George Mason, the man, while incorporating the Patriot image and mission. From an initial welcome in the handsomely appointed lobby to a much-needed break in the comfortably sophisticated Ma-

# ADVANCED STATE INCOME TAX SCHOOL

son Lounge, each guest is greeted with impeccable service. Visitors are immersed in a setting that reflects the integrity, professionalism, and spirit of the university around them.

## General Information

The IPT registration desk will be open from 4:00 - 6:30 p.m. on Sunday, June 5, 2011 at the Mason Inn Conference Center and Hotel. Registrants should pick up their materials at that time.

Quizzes will be given during the week, with a final quiz on Friday. A cumulative passing score must be realized on the quizzes for successful completion of the school. The final quiz must be taken Friday at the scheduled time, so travel arrangements should be made accordingly. **No exceptions can be made to taking the quiz at the stated time on Friday.**

Fluency in English is required for successful completion of this course. Foreign language dictionaries may not be used during examinations.

Attire during the day is business casual.

Photos will be taken at this event to use in publications on the IPT website and in organizational and individual photo albums.

## Continuing Education Credit

Approximately 41 continuing education credits (including 1 IPT Ethics credit) are available for full attendance. In accordance with the standards of the National Registry of CPE Sponsors, CPE credits have been granted based on a 50-minute hour. CMIs will obtain credit on an hour for hour basis for attendance.

Registrants who wish to obtain credit from other organizations for the school must submit their own forms to the IPT office or utilize the standardized form provided by the Institute.

As required by regulatory agencies, IPT must verify individual attendance at sessions in order to grant Continuing Education Credits. Each attendee's name badge has a unique barcode that identifies that individual. In order to obtain CE credit, the individual must have his or her bar-coded badge scanned during the first 15 minutes of each session. No credit for the session will be given to un-scanned attendees. Lost name badges should be reported immediately to an IPT staff member for a replacement. All attendees will receive a Certificate of Attendance with a record of their scanned attendance.

The Institute for Professionals in Taxation is registered with the National Association of State Boards of Accountancy (NASBA) as a sponsor of continuing professional education on the National Registry of CPE Sponsors. State Boards of Accountancy have final authority on the acceptance of individual courses for CPE credit. Complaints regarding registered sponsors may be addressed to the National Registry of CPE Sponsors, 150 Fourth Avenue North, Suite 700, Nashville, TN, 37219-2417. Website [www.nasba.org](http://www.nasba.org).

## CMI Designation—Income Tax

The Institute for Professionals in Taxation's designation, Certified Member of the Institute (CMI), is available to anyone who meets specific educational requirements, has five years of income tax experience, and is currently an income tax member in good standing of the Institute. The educational requirements to achieve the CMI Income Tax professional designation include successful completion of IPT's Income Tax Schools, IPT's Income Tax Symposium and either the IPT/ABA Income Tax Seminar or the Income Tax track at IPT's Annual Conference. Other educational credits, which may be obtained by attending additional programs such as IPT's Income Tax Symposia as well as other income/franchise tax courses, are required. A description of acceptable courses can be found in the CMI brochure and application available on the IPT website ([www.ipt.org](http://www.ipt.org)).

Successful completion of both the written and oral CMI examinations is required. The CMI requirements and the CMI Candidacy Application can be downloaded from the IPT website at: [www.ipt.org](http://www.ipt.org), or you may contact the IPT office at 404.240.2300.

**Prerequisites:** Five or more years experience in state income taxes  
**Field of Study:** Taxation (Income Tax)  
 Regulatory Ethics  
**Program Level:** Advanced  
**Instructional Method:** Group Live  
**Advance Preparation Required:** None