



Connect. Engage. Impact.

2026 Annual Conference

Grand Hyatt Nashville
October 18–21

Program at a Glance

Monday, October 19, 2026

	8:00 AM - 8:10 AM	Welcome/Introductions
FED/INTL	8:10 AM - 9:25 AM	Midterm Election Preview and Implications for Tax Policy
	9:25 AM - 9:45 AM	Break
TECH	9:45 AM - 10:45 AM	Breakout Sessions
INTL		OECD Pillar Two: Lessons Learned from the First GIR Filing Cycle
IRSAA		The New IRS Exam Environment: Workforce Shifts, Technology, and Practical Strategies
SALT		State Tax Policy & Legislative Outlook: 2026–2027 Priorities for Tax Departments
TECH	TAX LAB	Uniting CoCounsel Tax and ONESOURCE
	10:45 AM - 11:00 AM	Break
	11:00 AM - 12:00 PM	Breakout Sessions
INTL		Tariffs, Transfer Pricing, and Cost Pressure: Aligning Tax and Trade Strategies
IRSAA		IRS Exam to Appeals: Deep Dive into Trending Resolution Strategies
CTO/FIN		Beyond the Footnote: What ASU 2023-09 Reveals About ETRs and Tax Policy
TECH	TAX LAB	Catalyst for Change: Architecting a GenAI-Driven Tax Function
	12:00 PM - 1:30 PM	Luncheon (Chapter Leaders Lunch)

TRACK DESIGNATIONS: Educational tracks are identified throughout the program as follows:

TLD – Tax Leadership & Development
CTO – Chief Tax Officer
GEN – General

FED – Federal Tax
FIN – Financial Reporting

IRSAA – IRS Administrative Affairs
INTL – International Tax

TECH – Tax Technology
SALT – State & Local Tax
CAN – Canada

KEY: **A** Accounting Credit

October 18 - 21, 2026 / Grand Hyatt, Nashville

TEI's 81st Annual Conference Program

Monday, October 19, 2026 (cont.)

1:30 PM - 2:30 PM		Breakout Sessions
TLD		From Confusing to Compelling: C-Suite Communication for Tax Leaders in the Age of AI
IRSAA/FED		A Turning Point in R&D Credit Cases: Key Principles and Implications
INTL		Top 10 Things Every U.S. Tax Director Should Know about Canadian Sales Taxes
TECH	TAX LAB	Prompt Engineering for Tax Teams (Pt 1)
2:30 PM - 2:45 PM		Break
2:45 PM - 3:45 PM		Breakout Sessions
SALT		Base Broadening Playbook: Where States Are Expanding Sales Tax Next
IRSAA/FED		R&D Credit Documentation: What's Changed and Compliance Best Practices
FED		Troubled Companies: Tax Considerations in Distress, Restructuring, and Turnaround Situations
TECH	TAX LAB	Strategic Scenario Modeling in Bloomberg Tax Workpapers
3:45 PM - 4:15 PM		Sponsor Networking Break
4:15 PM - 5:15 PM		Breakout Sessions
INTL		Brazil Tax Update
SALT		Unlocking State Tax Incentives: Practical Strategies for Tax Departments
IRSAA/FED		Captive Partnerships in Corporate Groups: Opportunities, Pitfalls, and Defending IRS Challenges
TECH	TAX LAB	The Anatomy of a Tax Defense—Mining Administrative Rulings and Legislative History in CCH
6:30 PM - 11:00 PM		Sponsor Parties/Events

Tuesday, October 20, 2026

8:15 AM - 8:30 AM		Welcome Back
TLD	8:30 AM - 9:30 AM	Organizational Change Management and the Humanization of AI Dave Martin Leadership Speaker / Success Coach
9:30 AM - 9:45 AM		Break

TEI's 81st Annual Conference Program

Tuesday, October 20, 2026 (Cont.)

9:45 AM - 10:45 AM		Breakout Sessions
INTL		Foreign Tax Redeterminations and Pillar Two: Managing Post Filing Adjustments
IRSAA/FED		Economic Substance Doctrine Developments: Court Decisions, IRS Enforcement, and Practical Implications for Taxpayers
SALT		State Tax Cases to Watch: Key Rulings and Strategic Implications
TECH	TAX LAB	Research Credit Automation
10:45 AM - 11:00 AM		Break
11:00 AM - 12:00 PM		Breakout Sessions
FED		Deductibility Under Debate: Section 174, Capitalization, and What's Next for R&D
IRSAA		Preparing for IRS Appeals: Strategy, Advocacy, and Issue Resolution
INTL		Global Mobility Tax Update
TECH	TAX LAB	Tax Controversy Technology
12:00 PM - 1:30 PM		Luncheon - CTO Session
1:30 PM - 2:30 PM		Breakout Sessions
SALT		State Conformity Update: Navigating OBBBA Fallout and Complex Decoupling Issues
IRSAA		Smarter IDR Responses: Leveraging Human Insight and Technology
FED		Payroll and Employment Tax Opportunities in Complex Transactions
TECH	TAX LAB	Getting Started with Power BI: Hands-On Fundamentals Extended Lab (Pt. 1)
2:30 PM - 2:45 PM		Break
2:45 PM - 3:45 PM		Breakout Sessions
INTL		Multilateral Dispute Resolution: The Latest
SALT		State Corporate Income Tax Developments: Key Trends and Implications
FED		Tax Due Diligence: What's Changed in the Last 12 Months
TECH	TAX LAB	Getting Started with Power BI: Hands-On Fundamentals Extended Lab (Pt. 2)
3:45 PM - 4:15 PM		Sponsor Networking Break

Tuesday, October 20, 2026 (Cont.)

4:15 PM - 5:15 PM		Breakout Sessions
INTL/FIN		Accounting Issues in Pillar Two, the Side-by-Side System, and CbC Reporting
SALT		Alternative Apportionment Strategies: Challenging Distortion in a Single Sales Factor Environment
FED		The Evolving Consolidated Group Continuation Landscape
TECH	TAX LAB	Less Compliance, More Strategy—AI's Promise for Tax
6:30 PM - 9:30 PM		TEI Grand Reception

Wednesday, October 21, 2026

7:30 AM - 8:30 AM		Thomson Reuters Advisory Board
8:30 AM - 9:30 AM		Breakout Sessions
TLD		The Talent Highway: Hiring, Upskilling, and Thriving in the AI Era
SALT/TECH		Operational SALT Transformation: Data, Workflows, and AI-Assisted Execution
FED		The Acronyms Strike Back: FEOC, BEAT, CAMT and Other Key Tax Credit Purchase Considerations
TECH	TAX LAB	Using AI to Analyze Excel Files for Accountants Extended Lab (Pt. 1)
9:30 AM - 9:45 AM		Break
9:45 AM - 10:45 AM		Breakout Sessions
		XXX: Todd Idea: Tax Tech with Tools you Have for Tier 3 Accounting Firms
SALT		SALT Audit Survival Guide: Navigating Modern State Audits
FED		Beyond Cash Tax Savings: The CFO and Investor Relations Case for Tax Credit Purchases
TECH	TAX LAB	Using AI to Analyze Excel Files for Accountants Extended Lab (Pt. 2)
10:45 AM - 11:00 AM		Break
TLD		11:00 AM - 12:15 PM Advanced AI in Tax: Use Cases, Privilege, and Practical Risk Management