



**77<sup>th</sup>**

**Annual Conference**  
 Scottsdale, AZ  
 Preliminary Program



**SUNDAY, OCTOBER 23**

9:00 - 11:30 AM	Executive Committee Meeting
11:30 AM - 1:00 PM	<b>Executive Committee and Past International Presidents Luncheon</b>
1:00 - 4:00 PM	Board of Directors Meeting
4:00 - 5:00 PM	<b>Committee Meetings</b> (CTM, FED, IRSAA/CAP, SALT, INTL)
6:30 - 7:30 PM	<b>Welcome Reception</b>
7:30 - 9:30 PM	<b>Executive Committee and Past International Presidents Dinner</b>

**MONDAY, OCTOBER 24**

	7:00 - 7:45 AM	<b>TEI Chapter Leaders' Roundtable</b> ○
	8:00 - 8:15 AM	Welcome & Opening Remarks – Wayne G. Monfries, <i>International President, Tax Executives Institute, Inc.</i>
FED/INTL/CTM	8:15 - 9:30 AM	<b>Swamp Talk – Federal Tax Legislative &amp; Regulatory Update, Midterm Elections, and 118th Congress Preview</b>
	9:30 - 9:45 AM	Break
FED/INTL/CTM	9:45 - 11:00 AM	<b>Facing the Challenges of Today and Preparing for Tomorrow – A Roundtable Discussion with the Big Four's U.S. Tax Practice Leaders</b> ○
	11:00 - 11:15 AM	Break
INTL/SALT	11:15 AM - 12:15 PM	<b>Hybrid &amp; Remote Workforce Issues – Corporate Income Tax Risks and Best Practices</b>
FED/IRSAA/TECH		<b>Technology Tools to Improve Your Research Credit Process and Comply with the Capitalization Requirement for Post-2021 Section 174 Expenditures</b>
FED/INTL		<b>Tax Implications of Cryptocurrency, NFTs, and Other Digital Assets</b>
	12:15 - 2:15 PM	<b>LUNCHEON &amp; TEI Award Presentation</b>
SALT	2:15 - 3:15 PM	<b>Hybrid &amp; Remote Workforce Issues – State Employment and Payroll Tax Considerations</b>
INTL/IRSAA		<b>International Tax Controversy – APAs, Competent Authority, and MAP Proceedings</b>
FED/INTL		<b>Unpacking the Tax Treatment of Post-2021 R&amp;E Expenditures Under Section 174 and Potential Implications Across the Return</b>
	3:15 - 3:45 PM	<b>Sponsor Networking Break</b>
FED/INTL	3:45 - 4:45 PM	<b>The Inflation Reduction Act's Book Minimum Tax</b>
CTM/FED/INTL		<b>Taxation of Financial Instruments and Hedging Transactions – A Timely Refresher for Turbulent Times</b>
SALT/TECH		<b>Enhancing the Value of the State Tax Function Through Technology and Process Automation</b>
	4:45 - 5:00 PM	Break
INTL	5:00 - 6:00 PM	<b>Applying the New Foreign Tax Credit Regulations</b>
FED/IRSAA		<b>Navigating IRS Requests for Increased Transparency in Research Credit Positions</b>

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

- CTM – Corporate Tax Management
- FIN – Financial Reporting
- IRSAA – IRS Administrative Affairs
- TECH – Tax Technology
- FED – Federal Tax
- INTL – International Tax
- SALT – State & Local Tax

**KEY:** ○ – **ROUNDTABLE**  
 Ⓐ – Accounting Credit  
 Ⓔ – Ethics Credit

SALT		Around the States – Everything you Need to Know About the Top State and Local Tax Issues
	6:00 - 6:45 PM	Thomson Reuters Cocktail Reception
	7:00 - 11:00 PM	Sponsor Parties & Events
<b>TUESDAY, OCTOBER 25</b>		
	7:00 - 8:00 AM	CTO BREAKFAST
	8:00 - 8:20 AM	Welcome Back & TEI Award Presentation
INTL	8:20 - 9:30 AM	OECD/G20 BEPS Pillars One & Two – Where Are We and Will We Cross the Finish Line?
	9:30 - 9:45 AM	Break
INTL	9:45 - 10:45 AM	OECD/G20 BEPS Pillars One & Two Implementation – Holistic and Practical Issues
CTM/FED/IRSA		Challenging the Validity of Treasury Regulations and IRS Guidance – Considerations (and Major Questions) for the In-House Tax Professional
SALT		SALT Considerations During an Economic Slowdown
	10:45 - 11:00 AM	Break
INTL/TECH	11:00 AM - 12:00 PM	GloBE Meets GILTI – Integrated Planning & Modeling Strategies
FED		Using of Partnerships and Other Pass-Through Entities in Corporate Groups – A Balancing Act
SALT		NOLs – The Most Valuable State Tax Assets You Only Think You Have
	12:00 - 2:00 PM	LUNCHEON & TEI Award Presentation Inflation Reduction Act – Beyond the Beltway Briefing
INTL	2:00 - 3:00 PM	Current & Emerging Issues in Cross-border U.S.–Canada Structures and Transactions
CTM/FIN		Linking Tax to Environmental, Social and Governance (ESG) Policymaking
SALT		The Worst SALT Decisions of the Year
	3:00 - 3:15 PM	Break
FED	3:15 - 4:15 PM	The Fundamentals of Section 704(c) – Understanding Partnership Book-Tax Differences
INTL/SALT/TECH		A New Era in Collecting and Remitting Indirect Taxes – E-Invoicing and Other Emerging Indirect Tax Issues
CTM/FED		Insuring Your Company's Tax Positions – A Guide for the In-House Tax Professional
	4:15 - 4:45 PM	Sponsor Networking Break
INTL/TECH	4:45 - 5:45 PM	Modeling Transfer Pricing Outcomes in Uncertain Times
FIN		FASB/Financial Reporting Update
FED/SALT		Adding Value Through Tax Credits and Incentives
	7:00 - 9:00 PM	TEI Grand Reception
<b>WEDNESDAY, OCTOBER 26</b>		
	7:30 - 8:30 AM	Thomson Reuters Advisory Boards
CTM/FED/INTL/IRSA	8:30 - 9:30 AM	A Case Study on the IRS Private Letter Ruling Process for Business Taxpayers, and Understanding the Associated Benefits, Costs, and Risks
FIN/INTL/TECH		Achieving Operational Readiness for Pillar 2 – The Time Is Now
IRSA		Update on IRS Appeals
	9:30 - 9:45 AM	Break

CTM/FED/ IRSAA	9:45 - 10:45 AM	Ethics and Privilege Issues for In-House Tax Professionals in a High-Tech World ● E
INTL/SALT		State Taxation of Foreign Income – An Update on TCJA Conformity, Subpart F Inclusion, Factor Representation, and Other Issues
TECH		How Tax Department Leaders Effectively Use Technology to Measure and Disclose a Company's Total Tax Contribution and Other ESG Indicators
	10:45 - 11:00 AM	Break
CTM	11:00 AM - 12:15 PM	Tax Strategy & Best Practices for Maintaining an In-Person/Mobile/Hybrid/Remote Workforce in a Post-Pandemic World

**ELIGIBILITY TO ATTEND:** Registration is open to TEI members and other in-house tax professionals. (Individuals engaged in private law, accounting, or other consulting practice are ineligible to attend.)

#### REGISTRATION FEES

TEI is offering an early registration discount to members and non-members whose registrations and payments are received by TEI by September 23, 2022.

FEES	EARLY (BY 9/23/22)	REGULAR (AFTER 9/23/2022)
TEI Member	\$895	\$995
Non-Member	\$1,150	\$1,295
Member Emeritus or Member in Transition	\$725	\$795
First Time Attendee (Annual and/or Midyear Conference)	\$765	\$850

**MEMBERS-IN-TRANSITION:** TEI has lowered the conference fee for members-in-transition. Unemployed individuals who are members in good standing may register for the conference by paying only \$725 by September 23, 2022, or \$795 thereafter. Members wishing to take advantage of the reduced fee should contact TEI at [meetings@tei.org](mailto:meetings@tei.org) to affirm both their desire to obtain a full-time position in industry and that they do not hold non-qualifying employment such as with a law or accounting firm, as well as their adherence to TEI's policy of non-solicitation. They will then be given a discount code to use during the registration process.

**REGISTRATION PROCEDURE:** Please register online at [ac22.tei.org](http://ac22.tei.org) or send the completed registration form to TEI with your registration fee. Checks should be made payable to Tax Executives Institute, Inc. All payments must be in U.S. dollars. A registration form will not be processed unless accompanied by payment.

Because of TEI's lockbox procedures, registrations should not be sent to TEI's street address.

By Web: Go to [ac22.tei.org](http://ac22.tei.org)

By Email: [meetings@tei.org](mailto:meetings@tei.org)

By Mail and USPS Express Mail: Send registration form with check or credit card information (VISA, MasterCard, American Express, and Discover accepted) to Tax Executives Institute, Lockbox 9407, PO Box 70280, Philadelphia, PA 19176-0280.

By Fax: (202) 638-5607. Credit card registrations only.

Registration fees cover the following conference events: a welcome reception on Sunday; continental breakfast, breaks, and lunch on Monday; continental breakfast, breaks, lunch, and an evening reception on Tuesday; continental breakfast and breaks on Wednesday; and digital copies of all conference materials. After your registration has been processed, you will receive a confirmation and a receipt via email within two business days. (If you don't see it in your inbox, check your spam filter or send us an email at [meetings@tei.org](mailto:meetings@tei.org).)

**TEAM DISCOUNT:** As a special incentive for companies to send multiple attendees to the conference, a 25% discount will apply for the second (and all subsequent) full conference registrants from your company. In order to take advantage of this discount, the second and subsequent registrants must put in "AC22TEAM" into the discount code field during registration. The first registrant should not put in the discount code.

\* Every participant in the team discount must register for a full conference member or non-member rate.

\*\*Discounts may not be combined. You may not take the discounted First Timer Rate and also take the TEAM Discount. However, a First Timer may count as your first full registrant from your organization to earn the other attendees from your company the discount.

**FINANCIAL AID FOR ILLINOIS LICENSED ATTORNEYS:** Scholarships to defray tuition expense for this program are available for in-house tax professionals (both TEI members and nonmembers) who are temporarily unemployed and who are Illinois licensed attorneys with a demonstrated financial hardship. Scholarships will be reviewed and provided upon application on a case-by-case basis. Attorneys who qualify will receive at least a 50% reduction in the conference fee (which does not include any reduction or reimbursement for meals, lodging, or travel costs associated with the conference). To request information on whether you might qualify, please contact us at [meetings@tei.org](mailto:meetings@tei.org).

**CONFERENCE PARTICIPATION:** Conference name badges will be required for admission to all education sessions. A full conference registration cannot be split between registrants. Registrants are encouraged to visit exhibits hosted by TEI's conference sponsors, whose financial support enables the Institute to pursue its educational, networking, and advocacy goals without raising program fees or dues. Registrants should know that by entering drawings held by the sponsors, they are consenting to being contacted by the firms. In addition, TEI grants a one-time license to conference sponsors to contact registrants following the conference. Registrants wishing to have their names removed from the list provided to sponsors should write the word "remove" on the back of their business card and drop it off at the TEI Registration Desk.

Questions about TEI's sponsorship program should be directed to [asktei@tei.org](mailto:asktei@tei.org). Sponsors are not permitted to attend any educational sessions.

**MEAL TICKETS:** Registrants may purchase luncheon and reception tickets for guests at the TEI Registration Desk. Guest tickets may not be purchased for sponsors or practitioners.

**CONFERENCE HANDOUT MATERIALS:** Conference materials (e.g., session handouts, presentation slides) will be posted on the virtual conference platform. TEI encourages you to download or print documents of interest in advance. All materials will remain accessible to registrants for at least three months after the conference on the conference website.

**CONFERENCE PROGRAM:** The conference program is subject to change. Please check the interactive program on [ac22.tei.org](https://ac22.tei.org) for the most up-to-date schedule of events.

**CPE CREDIT INFORMATION:** Tax Executives Institute is registered with the National Association of State Boards of Accountancy as a sponsor of "group live" and Group Internet Based continuing professional education on the National Registry of CPE Sponsors (registry number 103086). State boards of accountancy have final authority on the acceptance of individual courses. Complaints regarding sponsors may be addressed to National Registry of CPE Sponsors, 150 Fourth Avenue North, Ste. 700, Nashville, TN 37219-2417. Website: [www.nasba.org](http://www.nasba.org). For more information regarding administrative policies such as complaint and refund, call TEI at (202) 638-5601.

Date: 77th Annual Conference, October 23-26, 2022

Delivery Method: Group Live

Prerequisites: None

Program Level: Overview

Field of Study: Taxes

**LEARNING OBJECTIVES:** To provide updates on legislative, regulatory, and judicial developments relating to international, indirect, and direct tax, corporate tax management and tax controversy, as well as to analyze the effect of financial reporting developments and tax technology on the effective operation for corporate tax departments.

Advanced Preparation: No advanced preparation required.

CPE Credits possible: Approx. 17.0

CLE Credits possible: Approx. 14.0

CPE/CLE requirements vary from jurisdiction to jurisdiction. TEI's educational programs are designed to meet NASBA standards and are generally accepted by CPE/CLE agencies across the United States. Registrants should check the rules in their own jurisdictions to ensure eligibility. TEI's 77th Annual Conference is co-sponsored by TEI Educational Fund, a qualified section 501(c)(3) organization.

**HOTEL INFORMATION:** A discounted block of sleeping rooms is available at the Westin Kierland Hotel for TEI Annual Conference attendees. Discounted sleeping rooms will be available for \$309 per night + \$19 resort fee (+ tax). To make your reservation [CLICK HERE](#). TEI's room block is limited and could sell out before our reservations cutoff dates on Monday, October 3. Please make your reservations early to avoid missing out on TEI's discounted room rate.

#### RESORT FEE COVERS:

- Resort-wide Wireless Internet
- Complimentary local and long-distance calls (domestic) from guest room phones
- Access to Agave, The Arizona Spa facilities (guests must be 18 years of age or older), Run Concierge, boot camp, yoga and Wellness Walk classes
- Expanded shuttle service to Kierland Commons and Scottsdale Quarter shopping districts
- Complimentary s'mores (Friday and Saturdays from 6:00-8:00 pm)
- Complimentary 2-hour bike rental per registered guest per day (based on availability)
- Tennis, Pickleball and basketball court privileges, including equipment rental
- Additional guest perks can be had by joining Marriott's Bonvoy loyalty program

## Transportation Information

The Westin Kierland does not have shuttle service from the Phoenix Sky Harbor International Airport (PHX). The Westin Kierland is approximately 19.5 miles from the Phoenix airport.

Taxi Service: Rate is approximately \$40-50 from PHX to Westin Kierland (19.5 miles) for one to four passengers

Uber and Lyft are also affordable options in getting to and from the hotel.

If you choose to rent a car while in Phoenix/Scottsdale, here are the hotel's current parking prices (rates subject to change):

- Valet Parking - **\$35 per day/night**
- Self-Parking - **\$20 per day/night**

**COVID-19 PROTOCOLS:** We are committed to fostering a safe and comfortable experience for those attending the Conference. All attendees must agree to comply with all COVID-19 safety protocols established by TEI and The Westin Kierland. For up-to-date information regarding these requirements, please visit: [ac22.tei.org](https://ac22.tei.org).

Participants cannot attend the event if they are feeling unwell, are aware that they have been in contact with someone who has tested positive for COVID-19 within 7 days leading up to the event or have displayed COVID-19 symptoms within 48 hours preceding the event. These symptoms may include fever or chills, coughing, shortness of breath, fatigue, muscle or body aches, headache, new loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting, and diarrhea. If you are unable to attend the event for any of these reasons, TEI's staff will work with you to transfer your registration to the following year's event or provide a full refund, at your choice. If an attendee becomes unwell during an event, he or she should not re-enter the TEI event space, but rather should immediately inform a TEI staff member who will work with the Westin Kierland to isolate the individual and seek medical attention as needed. If an attendee becomes unwell within the five days following the event, please notify TEI immediately. In appropriate circumstances, TEI will notify participants of potential COVID-19 exposures while doing our utmost to maintain attendees' privacy. Please contact [meetings@tei.org](mailto:meetings@tei.org) for assistance with any of these concerns.

**PERSONAL PROTECTIVE EQUIPMENT:** TEI will follow the Scottsdale's guidance regarding whether masks are required in indoor conference spaces. Scottsdale does not have a mask mandate. An inherent risk of exposure to COVID-19 exists in any public place where people are present. TEI encourages attendees to wear masks in indoor public settings. Free face masks will be available at the registration desk.

**ENHANCED SANITIZATION:** The Westin Kierland maintains the highest standards of hygiene and cleanliness, which include heightened sanitization of all spaces before and during each event with particular emphasis on high-touch surfaces such as door handles, restrooms, counters, and tables. During breaks, meeting rooms will be cleaned and refreshed. Wherever possible, we ask participants to retain the same seat throughout the day.

TEI and The Westin Kierland will provide hand sanitizing stations at key locations throughout the event space. Further, all participants are encouraged to frequently wash and disinfect their hands.

### **Cancellation and Substitution Policy:**

Cancellations made in writing by October 7, 2022 and will be subject to an administrative service charge of \$75 (USD); for cancellations after October 7 the charge will be \$200 (USD). No refunds will be made for cancellations received after October 14 or for no-shows; however, registrants will have full access to any on-demand content issued following the event. To cancel your registration, please send an email to [meetings@tei.org](mailto:meetings@tei.org).

**SUBSTITUTIONS:** There is a \$25 processing fee for each substitution, plus any registration fee difference. To request a substitution, please send an email to [meetings@tei.org](mailto:meetings@tei.org).

**CANCELLATION OR OVER-SUBSCRIPTION OF THE CONFERENCE:** In the event the conference must be canceled or is oversubscribed, TEI's liability is limited to the return of the registration fee.