



COMPANY ENSURES TCJA ALIGNMENT, MEETS TAX DEADLINES WITH SEAMLESS INTERIM STAFFING



Challenge

A communications technology company had changing tax leadership who wanted assurance of tax compliance and transition tax calculations in line with the TCJA. Then their internal tax team lost critical staff with deadlines looming for tax provisions and domestic compliance.



Solution

Armanino integrated tax professionals came in to work with the existing tax team in a review and advisory capacity. When key staff members left, our team was positioned with the working knowledge of corporate structure and tax methodology to step in and provide seamless support.



Result

By working with our tax advisors on a staffing solution customized to their unique needs, the company was able to complete their annual and quarterly tax provision and U.S. tax returns on time, and make organizational structural assessments to better align with TCJA changes.

CLIENT CHALLENGE

When the Tax Cuts and Jobs Act (TCJA) hit, a large communications technology and equipment manufacturer sought out Armanino to review and consult regarding their U.S. tax return, comprehensive Section 965 transition tax calculation and a complex quantitative modeling analysis for optimal tax operational structure. The projects uncovered meaningful discussions and adjustments that had not been considered.

THE TAX ISSUE

Armanino had previously provided tax compliance support, including comprehensive capabilities within U.S. international tax, U.S. domestic tax and compliance software. The company required additional support to complete their returns and to provide confidence in the accuracy of the complex calculations. While reviewing the transition tax calculations, Armanino found a significant adjustment.

In addition, the IRS was issuing regulations regarding new TCJA requirements and opportunities within international areas, including GILTI, FDII, BEAT and FTC. The company had questions regarding their existing corporate structure and opportunities to adjust and better align with TCJA requirements.

During this same period, the internal tax department also suffered a significant loss in headcount, losing multiple members at a critical time in their provision and domestic tax deadlines.

OUR SOLUTION

To solve for the corporate structure concerns post-TCJA, Armanino professionals engaged in a modeling exercise, analyzing several options and quantifying the various structures, better positioning management to make an informed decision.

To supplement the short-staffed internal team, Armanino utilized their existing knowledge of the company's organizational structure, how they make profits and their current tax situation. Armanino's tax team was in the ideal position to provide interim staffing support and was able to step in seamlessly and work closely with the internal employees.

THE RESULT

By working with our tax advisors on a staffing solution customized to their unique needs, the company was able to complete their annual and quarterly tax provision on time, with minimal stress, in addition to making organizational structural assessments to better align with TCJA changes.



OUR EXPERT

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