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Tax News & Views Health Care Edition

Impact of FATCA on the health care industry

The Foreign Account Tax Compliance Act's (FATCA) core objective is to address perceived abuses by U.S. taxpayers with respect to their offshore accounts and indirect investment income through non-U.S. entities. The regulations impact not only financial institutions, but also nonfinancial companies that make U.S.-source "withholdable payments" to non-U.S. entities. Furthermore, the regulations impose significant compliance burdens on payors making such cross-border payments and liability for any underwithholding. The reach of FATCA will require nearly every business with an international footprint or conducting business outside the United States to confront new compliance realities.

FATCA broadly defines Foreign Financial Institutions (FFIs) to include any foreign entity that accepts deposits; holds financial assets for the account of others as a substantial part of its business; or engages primarily in the business of investing or trading securities, commodities, partnerships, or any interests in such positions. FFIs are required to report the identities of their U.S. accountholders to the Internal Revenue Service (IRS). Failure to comply results in the imposition of a 30% withholding tax levied on any payment of U.S.-source income to the noncompliant FFI. To avoid the tax, FFIs must enter into a formal FFI agreement with the IRS to share the identities of U.S. accountholders and asset holders or comply with the requirements of an Intergovernmental Agreement, if applicable. FFIs must also register with the IRS and obtain a Global Intermediary Identification Number (GIIN). Unless exempted, other Nonfinancial Foreign Entities (NFFEs) seeking to avoid the tax will be required to provide information regarding certain of their U.S. owners to U.S. withholding agents (USWAs).

Industry Impact

The new FATCA rules will impose challenges for the health care industry.

- For health care organizations that engage in activities designed to mitigate risk, such as direct investment in offshore captive insurance companies or investment strategies executed through owned offshore funds, FATCA classification of these entities as an FFI or as a passive NFFE can result in FATCA obligations for the health care organization, such as FFI registration or documentation of an NFFE's U.S. owners.
- Activities with third-party offshore entities, such as investments to offset specific risks or structuring potential settlements through offshore insurance companies, could also result in FATCA impacts, including documentation, withholding, and reporting requirements.
- U.S. health care organizations engaged in the offshore outsourcing of services will need to meet the USWA requirements under FATCA.

Health care organizations that manage risk using insurance companies, hedge funds, and other investment structures and activities need to understand how entities are classified, when withholdable payments arise, and be able to analyze the application of the FATCA provisions and exemptions to the various structures used and activities into which they have entered. The scope of FATCA can impact investor relations; operations; and legal, compliance, and tax areas of the health care organization.

Examples of how health care organizations may be caught up in FATCA include:

- U.S. borrower obtaining a loan from a FFI that is not FATCA compliant
- Hedging transactions with non-U.S. counterparties
- Certain employee pension and retirement plans set up offshore
- Purchase of U.S. subsidiary from a foreign entity
- Captive offshore insurance companies that provide annuities written to U.S. persons or certain entities owned by U.S. persons
- Offshore insurance companies (not recognized as such by United States) investing funds on behalf of U.S. companies
- Holding companies and treasury centers that do not meet the exceptions under the regulations
- Companies that are owned by private equity firms that may be classified as FFIs or have investors that are FFIs
- Fixed, Determinable, Annual, or Periodical payments to undocumented NFFEs
- Documentation (e.g., Forms W-8 and W-9) and reporting requirements for both USWAs and FFIs will increase.

Find it Fast

Health care organizations that are impacted still may need to undertake substantial work to overcome any implementation challenges. As important FATCA effective dates in 2014 are nearing, health care organizations should begin now to analyze FATCA's implications on processes, systems, and business relationships.

Important FATCA dates* 2014	
April 25	Last date an FFI can register with IRS to confirm inclusion in the June 2, 2014 IRS FFI GIIN list.
June 2	IRS scheduled to publish first GIIN list. GIINs must be validated annually by USWAs making payments to FFIs.
July 1	Cutoff for certain obligations (e.g., debt) grandfathered under FATCA.
July 1	USWA and FFI to begin new account onboarding, including gathering of documentation (W-9, W-8 forms).
July 1	Begin income withholding.
December 31	FFI and USWA to complete documenting/ remediating preexisting accounts that are considered "prima facie FFIs."

* Other Withholding/Reporting requirements (e.g., with respect to Gross Proceeds) phase in from 2015 through 2018.

Proposed guidance issued for tax-exempt social welfare organizations

On November 29, 2013, the Treasury Department and the IRS issued proposed regulations that provide guidance on the requirements to qualify as a tax-exempt social welfare organization under Section 501(c)(4). Specifically, the proposed regulations define the term "candidate-related political activity" and would amend current regulations by indicating that the promotion of social welfare does not include this type of activity.

Under the proposed guidelines, candidate-related political activity includes:

Communications

- Communications that expressly advocate for a clearly identified political candidate or candidates of a political party.
- Communications that are made within 60 days of a general election (or within 30 days of a primary election) and clearly identify a candidate or political party.
- Communication expenditures that must be reported to the Federal Election Commission.

Grants and Contributions

- Any contribution that is recognized under campaign finance law as a reportable contribution.
- Grants to Section 527 political organizations and other tax-exempt organizations that conduct candidate-related political activities (note that a grantor can rely on a written certification from a grantee stating that it does not engage in, and will not use grant funds for, candidate-related political activity).

Activities Closely Related to Elections or Candidates

- Voter registration drives and "get-out-the-vote" drives.
- Distribution of any material prepared by or on behalf of a candidate or by a Section 527 political organization.
- Preparation or distribution of voter guides that refer to candidates (or, in a general election, to political parties).
- Holding an event within 60 days of a general election (or within 30 days of a primary election) at which a candidate appears as part of the program.

The IRS currently applies a "facts and circumstances" test to determine whether an organization is engaged in political activities that do not promote social welfare. The proposed guidance would reduce the need to conduct fact-intensive inquiries by replacing the test with more definitive rules. The proposed regulations apply only to Section 501(c)(4) organizations and do not address the definition of political campaign intervention under Section 501(c)(3).

Senator Baucus releases tax reform discussion drafts on tax administration, international tax, and tax accounting rules

Senate Finance Committee Chairman Max Baucus (D-Mont.) released three tax reform discussions drafts on November 20-22, 2013, regarding tax administration, international tax, and cost recovery. Each draft is not an introduced bill, but does contain legislative language and indicates the direction that Baucus is contemplating as he undertakes a large-scale rewrite of the tax code. The text of each proposal, summaries prepared by Finance Committee staff, and technical explanations prepared by the Joint Committee on Taxation staff were all released as part of each draft and are available on the Finance Committee website.

Tax Administration Reform Draft:
http://www.finance.senate.gov/newsroom/chairman/release/?id=a4f8205c-d286-4a41-a61d-753d1abd23d3
International Tax Reform Draft:
http://www.finance.senate.gov/newsroom/chairman/release/?id=f946a9f3-d296-42ad-bae4-bcf451b34b14
Cost Recovery and Accounting Reform Draft:
http://www.finance.senate.gov/newsroom/chairman/release/?id=536eefeb-2ae2-453f-af9b-946c305d5c93

The draft on reforming tax administration would aim to simplify the tax filing process, provide additional enforcement tools to the IRS, and reduce the tax gap by increasing information reporting in certain areas. The draft proposes several changes to due dates and filing requirements that Baucus says will simplify the process. For example, for calendar-year taxpayers, the draft proposes to accelerate the due date for partnership income tax returns from April 15 to March 15, delay the due date for S corporation returns to March 31, and delay the due date for C corporation income tax returns to

April 15. In addition, the draft would accelerate deadlines for filing information returns, such as Forms W-2 and 1099. Electronic filing would also be increased under the draft's proposals. Tax-exempt organizations would be required to file Forms 990 electronically, unless a waiver was granted. The draft would also increase electronic filing of Forms 5500 by employee benefit plans.

The draft on international tax reform proposes an overhaul of the tax rules governing U.S. multinational corporations. The draft on cost recovery and tax accounting rules includes proposed changes, such as repealing current-law depreciation rules; eliminating the like-kind exchange rules; and the last-in, first-out method of accounting, as well as requiring taxpayers to amortize half of their advertising expenses.

Modified "use-or-lose" rule for Health FSAs

IRS Notice 2013-71 was issued on October 31, 2013. The notice allows an employer to amend its health flexible spending arrangement (Health FSA) to permit an employee to carry a balance of up to $500 forward to the following plan year. Employers that want to take advantage of the new rule can make the change effective for the current year. The carryover of up to $500 does not affect the maximum amount of salary reduction contributions that the participant is permitted to make ($2,500 adjusted for inflation after 2012). The new carryover option provides an alternative to the current grace period rule.

A Health FSA allows employees to elect for each plan year to treat an amount of compensation to be available to reimburse qualifying medical expenses on a pretax basis. Qualifying contributions to, and withdrawals from, Health FSAs are tax exempt. Under the old rules, any unused amounts remaining in the Health FSA account at year-end would generally be forfeited. An employer could choose to provide an optional grace period following the end of each plan year of up to 2 1/2 months. Claims incurred during the grace period could be reimbursed from the prior plan year's unused balance.

Notice 2013-71 allows employers to offer either the $500 carryforward allowance or the 2 1/2-month grace period, but not both. An employer can offer a carryforward balance of an amount less than $500, but the same carryover limit must apply to all Health FSA plans. Amounts carried over to the next plan year pursuant to the new rule can be used to pay or reimburse medical expenses incurred at any time during that plan year. Employers wanting to take advantage of the new option must amend their Section 125 plan documents accordingly.

Not-for-profit organization operating two ice rink facilities maintains exempt status

The IRS issued TAM 201344009 concluding that a not-for-profit organization operating recreational ice rink facilities available to the general community continued to be tax exempt under Section 501(c)(3) even though it charged fees for ice time. The organization was formed by volunteers supportive of youth and adult ice hockey and other recreational ice hockey leagues. The ice rinks are used by three youth and adult ice hockey associations and figure skating clubs, all of which are open to anyone in the community to join. Two of the associations are recognized by the IRS as tax exempt and the third group is a non-profit entity. While the ice rink organization does not directly educate the children and adults in the skating activities, it does support the groups using the facilities to enable the instruction by providing and maintaining the ice rinks. The organization's hourly rates and open skate fees for its facilities are at or below the average hourly rates and fees for similar ice rink facilities in its region, including the facilities run by other counties, and the fees are all used to cover the cost of operating the facility. The organization also donates, free of charge, significant ice time to various other tax-exempt organizations in the local community for their activities.

In its analysis, the IRS stated that the operation of a community recreational facility may be considered "charitable" if the facilities are available to the general community and the fees do not restrict the use of the facilities to a limited number of the members of the public. The IRS stated that the organization's provision of the facilities to the public through open skate periods, physical education classes, youth ice hockey and figure skating groups, and donation of ice time to various charities establishes that the ice rinks and programs are available to, and affordable by, a significant segment of the general population or community. In addition, maintenance of an ice rink gives children the opportunity to learn and participate in sports and combats community deterioration and juvenile delinquency. Accordingly, the IRS held these activities are "charitable" and the organization continues to be tax exempt.

Did you know?

IRS releases updated Form 8822-B

The IRS has issued an updated Form 8822-B, Change of Address or Responsible Party. Effective January 1, 2014, taxpayers must use Form 8822-B to notify the IRS of a change of address or the identity of a responsible party. The responsible party is defined as the person who has a level of control over, or entitlement to, the funds or assets in the entity that enables the individual, directly or indirectly, to control, manage, or direct the entity and the disposition of its funds and assets. Form 8822-B must be filed within 60 days of the change. If the change in responsible party occurred before 2014 and the taxpayer has not previously notified the IRS of the change, Form 8822-B should be filed before March 1, 2014, reporting only the most recent change. There is a specific box on the form that exempt organizations must check.

IRS publishes inflation-adjusted items for 2014

The IRS published Revenue Procedure 2013-35, which outlines inflation-adjusted items for 2014. Certain items may affect tax-exempt organizations. For purposes of determining the insubstantial benefit limitations for contributions associated with charitable fundraising, "low cost articles" are articles costing $10.40 or less. The reporting exception for certain exempt organizations with nondeductible lobbying expenditures applies if the annual per person, family, or entity dues limitation is $110 or less.

California Franchise Tax Board newsletter discusses tax-exempt automatic revocations

The California Franchise Tax Board's November newsletter includes information for tax-exempt organizations with California tax-exempt status. Similar to the IRS process, California requires tax-exempt organizations organized or operating in California to apply for California tax-exempt status and file annual returns. If an organization fails to file the required California annual returns for three consecutive years, it will automatically lose its California tax-exempt status effective as of the filing due date of the third year. If an organization loses its California tax-exempt status, it must reapply using FTB 3500, Exemption Application. Loss of California tax-exempt status means an organization must file Form 100, *California Corporation Franchise or Income Tax return*, and the entity would be subject to the annual franchise tax.

Deloitte Thoughtware

Health Reform. The health reform bills (HR3590 and HR4872) are now law and will trigger sweeping changes and disruptions – some rather quickly and some over many years. The industry is asking, "What now?" At Deloitte, we continue to explore and debate the specific questions facing the industry, and we look forward to helping our clients find and implement the appropriate answers for their organizations. To learn more, visit Health Care Solutions on the Deloitte website.

Health Care Regulation. With quality in the spotlight on a national level, hospitals across the country are renewing their commitment to confirm that their services meet the core measures for quality set by the government and that internal controls are in place to help determine that the collection and reporting of quality data are accurate, complete, and compliant with government reporting requirements. The financial and operational impacts of regulation and legislative oversight in the life sciences and health care industries are pervasive and constantly changing. @Regulatory is a monthly publication that apprises readers of the latest regulatory, legislative, and other public policy developments affecting life sciences and health care organizations. Visit @Regulatory on the Deloitte website.

Deloitte Dbriefs

Deloitte Dbriefs are live webcasts that give you valuable insights on important developments affecting your business. We apologize for the inconvenience, but our registration links for the upcoming quarter are still in the process of being developed. Please visit http://www.deloitte.com/us/dbriefs to register for a webcast or click on the buttons below to be taken to the page where the Dbriefs registration link will be made available within a given series.

Financial Executives

Health Care Reform: New Insights and Actions for CFOs *January 15, 3:00 PM ET*

Even with the Affordable Care Act's shared responsibility penalties deferred until 2015, many companies are struggling with their strategy for health reform. What does the ACA mean for your organization, what are your choices, and how will decisions impact your workforce and brand? We'll discuss:

- Recent developments in ACA regulations, implementation, and adoption.
- Practical steps for addressing waste and wellness – the roots of health care costs.
- Cost containment and compliance opportunities, including hiring medical specialists, making wellness programs mandatory, and joining a hospital's or insurer's board.

Hear results of Deloitte's 3rd Quarter 2013 CFO Signals survey to learn how finance chiefs are addressing health care reform.

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2014 Outlook: Driving Business Growth in a Complicated and Uncertain Economy *January 23, 2:00 PM ET*

With the start of a new year, businesses still face uncertainty and economic complexity as they consider strategies for growth. What is the current forecast in this increasingly complex environment? We'll discuss:

- Evolving monetary and fiscal policies and the underlying health of the U.S. economy.
- Emerging trends in social and mobile, including the changing landscape and related risks, and their impact on transactions and business events.
- Outlook for transactions activity and factors impacting key industries, including economic issues, market competitiveness, and regulatory concerns.

Gain insights into evolving economic and market conditions to help set your business course in the year ahead.

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Charting a New Course: How Procurement Will Be Transformed by 2020 *February 19, 3:00 PM ET*

Procurement in 2020 could look very different than it does today, changing how financial executives look at procurement as a corporate function and competence. How can organizations that embrace new procurement models gain significant advantage over the competition? We'll discuss:

- How tomorrow's procurement function can be integral in supporting growth and driving bottom line performance.
- Ways that the procurement function can help identify and mitigate supplier and company risk.
- Talent implications of this evolution and the need for stronger alignment between finance, procurement, and the broader business.

Learn about the procurement renaissance taking place and how your company can take advantage of these changes.

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Financial Executives (cont'd)

Supply Chain Forensics: Identify Fraud, Waste, and Abuse in Your Organization *February 26, 2:00 PM ET*
For many companies, the supply chain represents both the largest source of cash outflows and interaction with outside business entities, so it can harbor many fraud, waste, and abuse-related risks. How can you leverage data analytics and forensic accounting to combat these risks? We'll discuss:

- Developing tailored criteria-based processes to help evaluate the relative risk value of your vendor relationships.
- Detecting and mitigating potentially costly risks, while also identifying opportunities to boost the organization's bottom line.
- Identifying and eliminating fraud, waste, and abuse perpetrated by your employees or your company's vendors.

Learn how leading companies employ supply chain forensics to mitigate risk and increase shareholder value.

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The Real Deal with Big Data: What Are the Right Analytics? *February 27, 2:00 PM ET*
Executive teams face myriad opportunities and risks surrounding big data. Boards and financial executives should understand what big data is, why it matters, and where high-value applications of analytics may be found. Are

your board and management team making the most out of big data? We'll discuss:

- A practical and useful definition of big data and associated opportunities and challenges.
- A process to help management focus on strategic analytics for risk management purposes.
- Considerations for leveraging analytics to help guide management toward high-return activities.

Learn how strategic analytics, applied to big data, can help detect opportunities and risks for your business.

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Analytics Trends: What Does the Future Hold for CFOs? *March 19, 3:00 PM ET*
With analytics already an important tool for many companies, what's next? How can CFOs use analytics to create new competitive advantage and enterprise value? We'll discuss:

- Current power users of analytics, including finance, marketing, and sales functions, and how CFOs can leverage the results.
- Emerging opportunities for analytics, including accessing new data sources, more advanced technology, and ways CFOs can influence and support decision-making across the business.
- Common barriers to widespread adoption, including data quality, IT infrastructure, alignment between initiatives, and skill sets.

Hear results of the Deloitte Analytics Advantage survey to learn about analytics trends and valuable insights to help guide CFOs next year.

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Getting Smart About Smartphone Technology *March 26, 2:00 PM ET*
With the growing popularity of bring your own device policies, smartphones now provide millions of employees with real-time access to both business and personal information. To mitigate risk and facilitate digital compliance, organizations should know what type of business information resides on employee smartphones and ways to preserve smartphone data for litigation, regulatory, or investigation matters. We'll discuss:

- Differences between data preservation on smartphones and computers and the impact this can have on organizations.
- Applications that may pose a data security risk to your organization.
- Potential challenges of smartphone data preservation.

Gain insights on how to protect your organization better in a world of changing technology.

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Industries

First, Do No Harm – Managing Privacy and Security Risks in Health Care *January 14, 1:00 PM ET*
As technological advances move health care toward quality improvements and cost reductions, sensitive information now in electronic format is at risk. How can health care organizations maintain the trust of consumers while protecting their sensitive information? We'll discuss:

- Health care industry challenges and trends that could disrupt current security and privacy practices.
- Considerations for health care organizations around confidentiality, integrity, availability, and accountability based on sound risk management practices.
- The role of policy as a foundation for security and privacy practices in health care.

Explore challenges associated with privacy and security in health care and potential strategies health care organizations might implement to manage these risks.

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2014 Investment Management Outlook: Adjusting for Growth in a Fast-Changing Environment *January 14, 2:00 PM ET*
Investment managers enter 2014 with a significantly changed competitive, legislative, and regulatory landscape. What are the top-of-mind issues for the industry and key opportunities for growth? We'll discuss:

- Hedge funds creating competitive advantage by catering to institutional investor demands and selecting alpha-generating opportunities.
- Mutual funds – tactically pursuing growth opportunities and achieving operational excellence amidst challenging market conditions.
- Private equity investors – adapting to the uncertainty around deal making, fundraising, regulatory developments, and tax legislation.
- Family offices – accommodating changing dynamics of wealthy families in a global investing environment.

Explore investment management industry trends and actions that may help position you for success for the year ahead.

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Fee-for-Service, Now Leaving the Station – Next Stop, Value-Based Care *February 11, 1:00 PM ET*
The transformation of the health care system through health care reform has fast-tracked the transition from fee-for-service to quality-based reimbursement. What are some recent developments that health system stakeholders should consider? We'll discuss:

- New and emerging frameworks for thinking about innovations required to begin paying for outcomes.
- Approaches current innovators are using to identify technologies and capabilities to manage the transition to quality-based reimbursement.
- How non-traditional players, such as retailers, employers, and financial institutions, will begin to shape the industry in new ways.

Explore potential implications these rapidly evolving models of reimbursement and care can have on consumers, new entrants, and the health care industry as a whole.

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Visualizing Resilience: Embracing Today's Technologies to Enable Real-Time Decision Making *February 19, 2:00 PM ET*
Despite technology advances, organizations still don't fully leverage new capabilities as they prepare for, respond to, and recover from crises. How can organizations use visualization applications and the enormous amounts of data available to them for real-time decision-making? We'll discuss:

- Ways that situational awareness can support proactive management of crises and enable real-time decision making.
- Understanding and visualizing risks and challenges across the resilience life cycle.
- Integrating various data sources for a broad view of readiness levels, key indicators, crisis response, and status of recovery efforts before, during, and after a crisis.

Explore the art of the possible for resilience data visualization.

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Health Care Technology Trends: Welcome to the Future *March 11, 1:00 PM ET*
The health care industry is likely to be in a state of flux responding to the democratization of medical knowledge, the consumerization of health care, and big data's impacts. What do these changes mean for health care stakeholders? We'll discuss:

- Emerging technology trends changing how the health care system operates and delivers care, including mHealth, analytics, and new care settings.
- Implications for the industry, including security and privacy, mobile device management, and new solutions to old problems.
- How the health care industry can capitalize on these emerging trends.

Explore technology innovations from Deloitte's annual Technology Trends report that could transform health care and ultimately improve consumers' health.

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Succession Management: Building Your Organization's Bench Strength *March 18, 2:00 PM ET*
By 2016 an estimated one-third of the federal workforce, including many in the Senior Executive Service, will be eligible for retirement. With similar estimates for state and local governments, the public sector faces a looming talent challenge. Are you ready? We'll discuss:

- Key elements and guiding principles of succession management.
- A six-step process that can help build your agency's bench strength.
- How immersive learning techniques can help develop the next generation of leaders, and how some agencies have begun to reap rewards from their cohesive pipeline-development strategies.

Learn about pitfalls that can limit the potential of your talent development program and drivers that can improve it.

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HR Executives

Uncovering Talent: A New Model for Inclusion *January 22, 2:00 PM ET*
Corporate America has made great strides toward inclusion, yet clearly programs and initiatives alone aren't enough. How can talent, inclusion, and diversity leaders change the game to get closer to their goals? We'll discuss:

- The extent to which employees are engaging in covering – the process through which individuals manage or downplay their differences.
- The negative impact covering has on individuals' sense of self and commitment to their respective organizations.
- The new model of uncovering talent and specific actions organizations can take to address these challenges.

Learn ways to uncover talent to achieve inclusion within your organization.

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Unlocking the Explorer's Passion: Develop Talent Your Company Can't Live Without *February 12, 2:00 PM ET*
Facing today's rapid change, companies need workers who embrace challenges, connect with others to find solutions, and are committed to making an impact in their domain. So why do only 11 percent of U.S. workers possess these critical attributes? We'll discuss:

- Hiring for dispositions rather than skills to help weather challenges and discover opportunities.
- Developing talent through meaningful and challenging on-the-job learning opportunities rather than traditional training programs and employee engagement efforts.
- How legacy institutional practices designed to maximize predictability may actually squelch passion.

Based on results of a recent Deloitte survey, learn how to identify passionate workers in your organization and cultivate these behaviors throughout your workforce.

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High-Impact HR: What's Holding Organizations Back? *March 12, 2:00 PM ET*
Organizations have transformed their HR functions for years to be more strategic partners to business units. So why haven't more HR organizations achieved true, high-impact HR? We'll discuss:

- Drivers of high-impact HR, including globalization, diversification of business strategies, and the war for top talent.
- Considerations for effective HR transformation, including HR's role as business partner, the value of analytics and internal and external data, and establishing the case for change.
- HR structures that help drive and maintain business alignment.
- Five emerging trends that may constitute the next wave of HR transformation.

Hear results of research from Bersin by Deloitte to learn how companies are achieving high-impact HR.

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Contacts

Please contact your local Deloitte Tax LLP provider for more information on our services.

Fran Bedard — Nashville
fbedard@deloitte.com
+1 615 259 1811

Lori Boyce — Detroit
lboyce@deloitte.com
+1 313 396 3324

Jeff Frank — Indianapolis
jdfrank@deloitte.com
+1 317 656 6921

Margaret Grinnell — Chicago
mgrinnell@deloitte.com
+1 312 486 9025

William Homer — Philadelphia
whomer@deloitte.com
+1 215 299 4642

Christine Kawecki — Jericho
ckawecki@deloitte.com
+1 516 918 7138

Tom Kromer — Columbus
tkromer@deloitte.com
+1 614 229 4705

Frank Neczypor — Boston
fneczypor@deloitte.com
+1 617 437 2728

Diana McCutchen — Costa Mesa
djmccutchen@deloitte.com
+1 714 436 7702

Mary Rauschenberg — Chicago and Washington National Tax
mrauschenberg@deloitte.com
+1 312 486 9544

Steve Rovner — Tampa
srovner@deloitte.com
+1 813 273 8355

John W. Sadoff, Jr. — Atlanta
jsadoff@deloitte.com
+1 404 220 1352

Jim Sowar — Cincinnati
jsowar@deloitte.com
+1 513 784 7242

Mike Walton — San Francisco
mwalton@deloitte.com
+1 415 783 6424

Yvette Woods — McLean
ywoods@deloitte.com
+1 703 251 1420

Sharon Zorbach — San Jose
szorbach@deloitte.com
+1 408 704 2063