

Combined Reporting Example

The example illustrates a unitary group that includes a parent corporation and three subsidiaries. Three of the four unitary corporations have sufficient connection with Idaho requiring them to file Idaho income tax returns. Because the group is unitary, we've used the combined reporting method to compute business income and everywhere property, payroll and sales. We've computed the Idaho apportionment factors, Idaho taxable income, Idaho net operating loss deduction, Idaho credits, and Idaho tax liability for each of the three corporations required to file in Idaho.

Because our example assumes a group return is being filed, the schedules include totals that would appear on the Idaho Form 41 filed for the group.

Combined federal taxable income

Of the four corporations, the following three corporations filed a federal consolidated income tax return, Form 1120: ParentCorp, Subsidiary 1 (Sub 1), and Subsidiary 2 (Sub 2). Both Sub 1 and Sub 2 are 100% owned by ParentCorp.

Subsidiary 3 (Sub 3) isn't included in the federal consolidated return, but files a separate return. ParentCorp owns 70% of the stock of Sub 3, which is less than the 80% ownership required for inclusion in a federal consolidated return but meets the more than 50% ownership required to be included in the combined report.

Schedule 1300, page 12, shows the federal taxable income of the four corporations.

Defining the scope of the unitary business and combined apportionable income

More than 50% of the voting stock of all four corporations is owned directly or indirectly by a common owner. Common ownership is required for inclusion in a combined report.

Some of the factors indicating that the four corporations operate as a unitary business are:

- ParentCorp, Sub 1, Sub 2, and Sub 3 have some of the same directors and officers.
- Capital budgets for all four corporations are reviewed by ParentCorp.
- There are \$2,000,000 in intercompany sales.
- ParentCorp purchases insurance for all of the corporations and provides legal counsel. Insurance and legal services provided by ParentCorp were billed to its subsidiaries with the intercompany charges totaling \$300,000 and reported by ParentCorp as "other income."
- Large loans for all four corporations are arranged by ParentCorp.

These facts indicate that ParentCorp and its three subsidiaries are unitary. The combined reporting method is therefore required.

The income of the unitary business is the total of each corporation's income or loss net of intercompany eliminations. See Schedules 1200 and 1300 for the computation of apportionable income. The total net income of the four corporations is the "combined income" that is apportioned between Idaho and other taxing jurisdictions.

Addition of tax-exempt interest

Idaho Code requires the addition of interest and dividends received or accrued during the tax year from securities issued by states other than Idaho and its political subdivisions, which interest is exempt from federal income tax under the IRC. However, any expenses not allowed under IRC Sections 265 and 291 that are related to the production of this income reduce the amount of interest and dividends added back.

On Schedule 1200 we see an addition for “Interest and dividends exempt under IRC” for \$20,000. ParentCorp received a total of \$21,000 of interest income from municipal obligations issued in states other than Idaho. This interest income is tax exempt under the IRC. ParentCorp reduced its interest expense on its federal return by \$1,000 pursuant to IRC Section 265. Consequently, the net amount of tax-exempt interest income added back is \$20,000.

Interest expense offset for tax-exempt interest income

A deduction isn’t allowed for interest expense on indebtedness related to obligations that earn interest income exempt from Idaho tax. The portion of interest expense attributable to tax-exempt obligations is computed using a ratio.

On Schedule 1200 we see a deduction for “Tax-Exempt Interest on U.S. Obligations” of \$75,000 “Less interest expense offset” of (\$2,684) which was computed on Schedule 1500, page 13.

Bonus depreciation

Idaho conformed to federal bonus depreciation only for property acquired during 2008 and 2009. If you claim bonus depreciation on property acquired during other years, you must report an Idaho adjustment for the difference between federal depreciation and Idaho depreciation computed without claiming bonus depreciation. You’ll also need to report an Idaho adjustment if you sold or exchanged property before it was fully depreciated on which you claimed federal bonus depreciation.

To determine the Idaho adjustment:

1. Complete and include with your return a separate federal Form 4562 or detailed computation for Idaho depreciation purposes as if you hadn’t claimed the special depreciation allowance. Mark this with “Idaho” at the top.
2. Use the Idaho depreciation amounts to compute the Idaho adjusted basis and any gains or losses from the sales or exchange of the property.
3. Determine the net difference between the federal amounts of depreciation and gain or loss from these assets and the Idaho amounts. The net difference will be an Idaho bonus depreciation addition or subtraction on Idaho Form 41.

In our example, ParentCorp has a net Idaho addition of \$40,000.

Capital gains

In our example, ParentCorp has a \$350,000 capital gain on the sale of stock representing a minority interest in a corporation not included in the unitary group. The stock investment wasn’t a temporary investment of working capital of the unitary business. ParentCorp bought the stock when it thought the shares were undervalued. The stock wasn’t purchased to further a business relationship with either a supplier or customer of any of the four unitary corporations, to obtain technical know-how or marketing information, or for any other operational reasons. The investment was passive rather than operational. As a result, the gain on the sale of this stock is excluded from the unitary group’s apportionable tax base, and neither the sales price nor the gain from the sale of the stock is included in the sales factor computation.

The \$350,000 nonbusiness gain on the sale of the stock was included in the \$800,000 of capital gain net income reported as part of federal taxable income, as shown on Schedule 1300. Consequently, a nonbusiness deduction of \$350,000 is a state adjustment on Schedule 1200. Because the nonbusiness gain is income from the sale of an intangible, it's allocated to the state of the corporation's commercial domicile. If nonbusiness income is attributable to property other than an intangible, the nonbusiness income is allocated to the jurisdiction where the property is located. Since nonbusiness income isn't included in apportionable income, it isn't included in the sales factor computation.

The remaining \$450,000 of capital gain net income was net gain on the sale of securities that were included in an investment portfolio as part of the corporation's treasury function. A treasury function is a pooling and management of liquid assets used to meet the cash-flow needs of the business, such as providing liquidity for a taxpayer's business cycle, providing a reserve for business contingencies, holding trading positions in foreign currencies, and providing for business acquisitions. If the taxpayer holds liquid assets in connection with a treasury function, the overall net gain (rather than the gross receipts) from the disposal of these assets is included in the sales factor. In our example, the \$450,000 net gain results from the company's treasury transactions (transactional test) in the regular course of the taxpayer's business. As apportionable business income, the \$450,000 net gain is included in the sales factor computation as part of "Other gross receipts" under Everywhere Sales on Schedule 1800, page 15.

On Schedule 1300, Sub 1 reported a \$275,000 gain on the sale of an idle production facility. This gain is apportionable business income because the plant at one time functioned as an operational asset (functional test). The sales factor includes receipts from the sale of the plant, rather than the net gain. In this case, the plant sold for \$1,500,000, which is the amount included in the sales factor, rather than the resulting \$275,000 net gain. The \$1,500,000 is included in the sales factor denominator (see "Other gross receipts" under Everywhere Sales on Schedule 1800), but not in the Idaho numerator because the plant was located outside of Idaho.

Expense offset for nonbusiness income

All deductions and interest expense directly related to the production of nonbusiness income must be allocated together with the income produced. Any allowable deduction that's applicable both to business and nonbusiness income of the taxpayer is prorated to those classes of income in determining income subject to tax.

In the example, the taxpayer allocated to its state of commercial domicile \$350,000 of gain on the sale of stock. The federal return included deductions related to this sale for commissions paid, fees paid to legal counsel to prepare and review documents, compensation paid to corporate executives for the time spent on the sale, and sundry other expenses totaling \$40,000. The \$40,000 of expenses are reflected as a nonbusiness expense offset to the \$350,000 deduction for allocated nonbusiness gain (see Schedule 1200).

In the example, the corporation sold stock that was held solely for investment purposes that generated \$350,000 of nonbusiness gain. Prior to the sale of the stock, ParentCorp received a \$25,000 dividend, which it also treated as nonbusiness income. Schedule 1200 of the example shows a deduction from apportionable income for the \$25,000 of nonbusiness dividends. Administrative expenses of \$5,000 related to the allocated dividend are shown as an offset on Schedule 1200.

Corporations subject to Idaho's jurisdiction to tax

Both ParentCorp and Sub 1 lease property and transact business in Idaho. Consequently, both are subject to Idaho's income tax.

Sub 2 doesn't do business in Idaho, but it filed with the Idaho Secretary of State's office and received a certificate of authority to transact business in Idaho. Although Sub 2 has no property, payroll, or sales in Idaho, its authorization to do business in Idaho establishes a filing requirement. It's subject to the \$20 minimum corporate income tax and the \$10 permanent building fund excise tax.

Sub 3 makes some sales into Idaho. The orders are taken by phone at a sales office outside of Idaho and goods are shipped into Idaho by common carrier. Sub 3 has no other contact with Idaho, such as sales of services, owned or rented property in the state, nor has it filed with the Idaho Secretary of State. Mere solicitation of sales in Idaho isn't enough to give Sub 3 nexus in Idaho under Public Law 86-272. Consequently, Sub 3 isn't required to file an income tax return. Sub 3's sales aren't included in the sales factor numerator, and Sub 3 doesn't owe the \$20 minimum income tax, nor the \$10 permanent building fund tax.

Company apportionment factors and tax liability

The amount of combined income apportioned to Idaho operations of the unitary business is computed by a three-factor formula. See Schedule 1100, page 10, and supporting Schedules 1700, 1800, and 1900.

Both ParentCorp and Sub 1 transact business in Idaho, resulting in an apportionment factor for each of these corporations.

Sub 2 is only a name holder in Idaho. Consequently, its apportionment factor is zero.

Although part of the unitary business, Sub 3 doesn't transact business and isn't a name holder in Idaho. Consequently, its apportionment factor is zero.

In computing the factors, intercompany transactions are eliminated. Intercompany transactions eliminated from the sales factor include sales, interest, rents, royalties, and management fees. Intercompany transactions eliminated from the property factor include items such as intercompany profits in beginning and ending inventories and intercompany rents.

The sales factor is double weighted for all corporations except for electrical and telephone utilities. A unitary group that includes corporations that qualify and corporations that don't qualify as electrical or telephone corporations, should attach a schedule to the Form 41 that shows the computation of each corporation's Idaho apportionment factor. One Form 42 should be filed for the group by carrying forward the total amounts from the by-company schedule and entering them on the appropriate lines of the Form 42. Double weighting of the sales factor is shown on Schedule 1800 of the example.

Throwback sales

Sub 1 makes sales into Montana, filling orders from inventory located in Idaho. The sales activities in Montana by Sub 1 employees fall within the protection of P.L. 86-272 and therefore Sub 1 isn't subject to income tax in Montana. Consequently, the \$200,000 in sales of merchandise into Montana are included in the Idaho sales numerator as throwback sales because the merchandise was shipped from a warehouse in Idaho. See Schedule 1800.

Sales to the U.S. government are included in the sales factor numerator of the state from which they were shipped.

Unitary sharing of investment tax credit

Each corporation included in a combined report is required to compute Idaho credits and applicable limitations. Limitations based on tax are computed using the individual corporation's own tax liability, not the total tax of the unitary group. With the exception of the Idaho investment tax credit, credit earned by one corporation included in a unitary group can't be used by another member of the unitary group.

Idaho allows an investment tax credit (ITC) equal to 3% of the amount of qualifying property. Earned credit can be used to offset 50% of the income tax liability of the corporation that earned the credit. If the earned credit exceeds 50% of the corporation's tax liability, the amount not used may be shared with other members of the unitary group that haven't met the 50% limitation. ITC not used or shared may be carried forward up to 14 years. The unitary sharing of ITC is the one exception to the principle of separate tax attributes for members of a combined group.

In our example, we see on Schedule 1700 that Sub 1 increased the amount of real and tangible personal property in Idaho by \$800,000. Of this amount, \$500,000 qualifies for ITC as shown on Schedule 2200, page 17. The \$15,000 of credit earned is more than Sub 1 can use in the current year. Therefore, the unused credit became available to the other corporations in the combined group that have an Idaho income tax liability.

See schedules below:

- Schedule 1100 - Company apportionment factors and tax liability
- Schedule 1200 - Computation of apportionable income
- Schedule 1300 - Combined federal taxable income
- Schedule 1500 - Interest expense offset for tax-exempt interest income
- Schedule 1700 - Property factor computation
- Schedule 1800 - Sales factor computation
- Schedule 1900 - Payroll factor computation
- Schedule 2200 - Unitary sharing of Idaho investment tax credit

Schedule 1100: Company Apportionment Factors and Tax Liability

	Group return	ParentCorp	Sub 1	Sub 2	Sub 3
Idaho property factor (Schedule 1700)	15.8281%	8.3911%	7.4370%	0.0000%	0.0000%
Idaho double-weighted sales factor (Schedule 1800)	31.6050%	20.9520%	10.6530%	0.0000%	0.0000%
Idaho payroll factor (Schedule 1900)	12.9468%	9.7868%	3.1600%	0.0000%	0.0000%
Total percent	60.3799%	39.1299%	21.2500%	0.0000%	0.0000%
<i>Divide by 4</i>					
Idaho apportionment factor	15.0950%	9.7825%	5.3125%	0.0000%	0.0000%
Combined unitary business income subject to apportionment (Schedule 1200)	2,872,684	2,872,684	2,872,684	2,872,684	2,872,684
Idaho apportionment factor	15.0950%	9.7825%	5.3125%	0.0000%	0.0000%
Unitary business income apportioned to Idaho	433,631	281,020	152,611	0	0
Add: Nonbusiness income (loss) allocated to Idaho					
Less: Expenses allocated to Idaho nonbusiness income					
Less: Idaho net operating loss (NOL) carryforward					
IDAHO TAXABLE INCOME	433,631	281,020	152,611	0	0
Tax rate (applicable for 2018)		6.925%	6.925%	6.925%	6.925%
Idaho income tax (minimum \$20 if required to file Idaho tax return)	30,049	19,461	10,568	20	0
Add: Idaho investment tax credit recapture					
Less: Payments		0	0	0	0
Less: Credits (See Schedule 2200 for unitary sharing of ITC)	15,000	9,716	5,284	0	
Tax due	15,079	9,755	5,294	30	0

Schedule 1200: Computation of Apportionable Income							
	Combined	Intercompany eliminations	Total before eliminations	ParentCorp	Sub 1	Sub 2	Sub 3
Net income before state adjustments (from Schedule 1300)	2,935,000	(150,000)	3,085,000	1,912,500	660,000	(747,500)	1,260,000
<i>Add:</i>							
Interest + dividends exempt under IRC	20,000		20,000	20,000			
State + local taxes measured by income	255,500		255,500	120,000	47,000	500	88,000
NOL deducted on federal return							
Dividends received deduction	24,500	(400,000)	424,500	424,500			
Bonus depreciation	40,000		40,000	40,000			
Total Additions	340,000	(400,000)	740,000	604,500	47,000	500	8,800
<i>Deduct:</i>							
Foreign dividend gross-up							
Idaho municipal interest							
Interest on U.S. government obligations	75,000		75,000	75,000			
Less interest expense offset (Sch. 1500)	(2,684)		(2,684)	(2,684)			
Allocated income (capital gain income)	350,000		350,000	350,000			
Less expense offset	(40,000)		(40,000)	(40,000)			
Allocated income (dividend income)	25,000		25,000	25,000			
Less expense offset	(5,000)		(5,000)	(5,000)			
Bonus depreciation							
Total Deductions	402,316	0	402,316	402,316	0	0	0
Combined Unitary Business Income Subject to Apportionment	2,872,684	(550,000)	3,422,684	2,114,684	707,000	(747,000)	1,348,000

Schedule 1300: Combined Federal Taxable Income							
	Combined	Intercompany eliminations	Total before eliminations	ParentCorp	Sub 1	Sub 2	Sub 3
Sales	26,000,000	(2,000,000)	28,000,000	10,500,000	6,000,000	3,500,000	8,000,000
Cost of goods sold	16,900,000	(1,850,000)	18,750,000	7,000,000	3,750,000	3,000,000	5,000,000
Gross Profit	9,100,000	(150,000)	9,250,000	3,500,000	2,250,000	500,000	3,000,000
Dividends	35,000	(400,000)	435,000	430,000	5,000		
Interest	240,000	(40,000)	280,000	175,000	105,000		
Gross rents	10,000	(45,000)	55,000	55,000			
Gross royalties	0		0				
Capital gain net income	80,000		800,000	800,000			
Net gains and losses	275,000		275,000		275,000		
Other income	0	(300,000)	300,000	300,000			
Total Income	10,460,000	(935,000)	11,395,000	5,260,000	2,635,000	500,000	3,000,000
Compensation of officers	1,080,000		1,080,000	450,000	180,000	150,000	300,000
Salaries and wages	3,365,000		3,365,000	615,000	1,100,000	750,000	900,000
Repairs	15,000		15,000		15,000		
Bad debts	0		0				
Rents	27,500	(45,000)	72,500	7,500	65,000		
Taxes	278,000		278,000	165,000	30,000	33,000	50,000
Interest	375,000	(40,000)	415,000	375,000	15,000		25,000
Contributions			0				
Depreciation	364,500		364,500	205,000	75,000	34,500	50,000
Depletion	0		0				
Advertising	400,000		400,000	400,000			
Pension, profit-sharing, etc., plans	43,000		43,000	43,000			
Employee benefit programs	200,000		200,000	95,000	35,000	30,000	40,000
Other deductions	1,352,500	(300,000)	1,652,500	567,500	460,000	250,000	375,000
Total Deductions	7,500,500	(385,000)	7,885,500	2,923,000	1,975,000	1,247,500	1,740,000
Taxable income before NOLs, sp. Ded.	2,959,500	(550,000)	3,509,500	2,337,000	660,000	(747,500)	1,260,000
Net operating loss (NOL) deduction							
Special deductions	24,500	(400,000)	424,500	424,500			
Federal Taxable Income Before State Adjustments	2,935,000	(150,000)	3,085,000	1,912,500	660,000	(747,500)	1,260,000

Schedule 1700: Property Factor Computation					
	Group Return	ParentCorp	Sub 1	Sub 2	Sub 3
<i>Numerator: Idaho property</i>					
Beginning inventory	133,500	68,500	65,000	0	0
Intercompany profits in beginning inventory	(7,000)	(7,000)			
Beginning real and tangible personal property	715,000	615,000	100,000	0	0
Total beginning owned property - Idaho	841,500	676,500	165,000	0	0
Ending inventory	175,000	78,000	79,000	0	0
Intercompany profits in ending inventory	(10,000)	(10,000)			
Ending real and tangible personal property	1,550,000	650,000	900,000	0	0
Total ending owned property - Idaho	1,697,000	718,000	979,000	0	0
Average beginning/ending owned property	1,269,250	697,250	572,000	0	0
Idaho rent expense	29,800	4,800	25,000	0	0
Intercompany rents	(15,000)		(15,000)		
Net Idaho rent expense capitalized X 8	118,400	38,400	80,000	0	0
Total owned + rented property - Idaho	1,387,650	735,650	652,000	0	0
(Average less property plus capitalized rents)					
<i>Denominator: Everywhere property</i>					
Beginning inventory	2,870,000	2,200,000	250,000	235,000	185,000
Intercompany profits in beginning inventory	(100,000)	(100,000)			
Beginning real and tangible personal property	5,192,000	2,567,000	700,000	475,000	1,450,000
Total beginning owned property - Everywhere	7,962,000	4,667,000	950,000	710,000	1,635,000
Ending inventory	1,672,000	1,035,000	270,000	217,000	150,000
Intercompany profits in ending inventory	(150,000)	(150,000)			
Ending real and tangible personal property	7,610,000	2,575,000	2,500,000	435,000	2,100,000
Total ending owned property - Everywhere	9,132,000	3,460,000	2,770,000	652,000	2,250,000
Average beginning/ending owned property	8,547,000	4,063,500	1,860,000	681,000	1,942,500
Everywhere rent expense	72,500	7,500	65,000		
Intercompany rents	(45,000)		(45,000)		
Net Everywhere rent expense capitalized X 8	220,000	60,000	160,000		
Total owned + rented property - Everywhere	8,767,000	4,123,500	2,020,000	681,000	1,942,500
(Average less property plus capitalized rents)					
Total owned and rented property - Idaho	1,387,650	735,650	652,000	0	0
Total owned and rented property - Everywhere	8,767,000	8,767,000	8,767,000	8,767,000	8,767,000
Idaho Property Factor	15.8281%	8.3911%	7.4370%	0.0000%	0.0000%

Schedule 1800: Sales Factor Computation NOTES					
A	[ParentCorp column]				
	\$25,000 consists of \$10,000 interest income received on installment sale to Idaho customer plus \$15,000 received from Sub 1 on warehouse rental in Idaho.				
B	[Sub 1 column]				
	\$5,000 of interest income received by Sub 1 from Idaho customers on revolving lines of credit to Idaho customers.				
C	[ParentCorp column]				
	\$15,000 of rents received by ParentCorp from Sub 1 on warehouse space in Idaho is eliminated as an intercompany receipt.				
D	[ParentCorp column]				
	Dividends	430,000			
	Interest	175,000			
	Interest and dividends exempt under the IRC	20,000			
	Gross rents	55,000			
	Net gain on securities in cash management portfolio (\$800,000 less \$350,000 nonbusiness gain)	450,000			
	Other income	300,000			
	ParentCorp, Other gross receipts	1,430,000			
E	[Sub 1 column]				
	Dividends	5,000			
	Interest	105,000			
	Sales price of mfg. plant resulting in \$350,000 gain	1,500,000			
	Sub 1, Other gross receipts	1,610,000			
F	[ParentCorp column]				
	Dividends	400,000			
	Interest	40,000			
	Rents	45,000			
	Other income	300,000			
	ParentCorp, Intercompany receipts	785,000			
G	[Columns: Sub 1, Sub 2, and Sub 3]				
	Sub 1, intercompany sales	200,000			
	Sub 2, intercompany sales	1,400,000			
	Sub 3, intercompany sales	400,000			
	Agrees with line 1 on Schedule 1300	2,000,000			

