



# Impact Analysis & Health Check

Consulting Services

## OVERVIEW

Are you a U.S. or non-U.S. person that has control, receipt, custody, disposal, or payment of any item of income of a non-U.S. person that is subject to withholding? If so, the IRS classifies you as a withholding agent which creates a responsibility to comply with the tax rules that govern the obligation to withhold, deposit, and report payments to foreign persons.

Every year, U.S. financial institutions and multinational corporations make payments of U.S. source income to non-U.S. individuals and entities. Sections 1441, 1442, 1443, 1446 and 1461 of the Internal Revenue Code and Treasury Regulations set forth the rules for what is often referred to as the nonresident alien ("NRA") Withholding Regime." These rules and regulations require 30% tax withholding on payments of U.S. source income to a non-U.S. person and the filing of Form 1042 and related Forms 1042-S.

## BSM & CTI CAN HELP

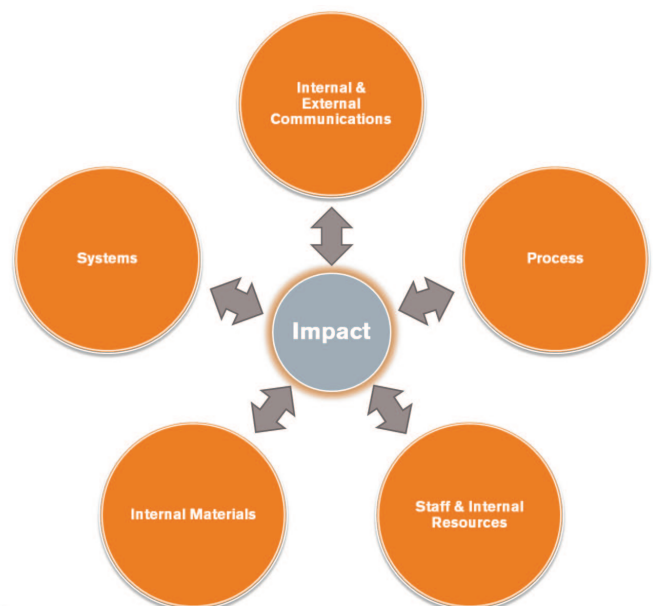
BSM and CTI can help simplify the complex rules and regulations to ensure compliance by conducting a thorough investigation of systemic and operational procedures with an Impact Analysis and Health Check.

## IMPACT ANALYSIS & HEALTH CHECK

Our Impact Analysis provides recommendations as to whether the current tax, systemic, and operational procedures comply with the 1441 NRA withholding rules, which can be used to prepare for an IRS audit. Alternatively, the Health Check review provides an overall systemic and operational review, identifying areas of heightened risk of non-compliance, and providing a holistic approach to compliance recovery in the NRA withholding regime.

BSM and CTI will deliver:

- A detailed Impact Analysis organized by functional categories.
- A summary of the relevant tax technical rules applicable to the functional category.
- An analysis of current procedures within each functional category.
- Recommendations on how to modify, change, or improve current processes or procedures to comply with the relevant tax technical rule(s).
- An analysis of the business and systems logic impact to your organization.
- An action plan matrix for each functional category detailing the actions and sub-actions necessary to enact the recommended changes or additions.
- A summary of project management details with groups affected and delivery dates for each recommended action in the action plan matrix.



## ABOUT US

Burt, Staples & Maner, LLP ("BSM") is an international law firm with offices in Washington D.C. and London specializing in every aspect of U.S. and international taxation. The Firm's lawyers bring to the practice their government and inter-governmental experience in tax policy, administration, and litigation acquired at the IRS and related agencies, as well as their experience at Big Four accounting firms.

Compliance Technologies International, LLP ("CTI") is the leader in cutting edge global tax withholding and information return reporting technology, consulting, and outsourcing services. We have a strong team of highly experienced international and domestic tax professionals, ranging from lawyers and accountants to software engineers and operations experts located in Boston, Los Angeles, New York, Washington D.C., and London.

BSM and CTI can keep you compliant with:

- Expert understanding of the tax regulations from industry leading tax professionals.
- Comprehensive current state analysis with proven methodologies from expert business analysts.
- Thorough system audits from system analysts with extensive tax technical experience.
- Complete suite of tax document validation, reporting, and withholding tools to help you achieve and maintain compliance.

## DISTINCT EXPERTISE

The BSM and CTI team prides itself in being different. Our unique set of experience, personnel, and resources helps our clients stay ahead of the curve. Seven out of world's top financial institutions depend on us to be compliant. Shouldn't you?

## CONTACT US

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**BURT, STAPLES & MANER, LLP**  
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## What Makes Us Unique?

Significant IRS experience gives you the knowledgeable resources you need.

Broad operational and industry experience gets you the expertise you deserve.

Experienced business analysts, system analysts, and project managers know your business.

Big Four background provides you with confidence in our results.

Proven methodology gives you peace of mind.

Tax law experts help you get the right answer the first time.