

State Tax Matters

The power of knowing. May 21, 2021

Article:

GILTI High-Tax Exclusion: Impact on State Taxes

When the concept of global intangible low-taxed income was introduced as part of the Tax Cuts and Jobs Act1 in 2017, it required a sprawling state income tax analysis: Would states tax GILTI? How would the income be apportioned? The past few years have brought some, if not all, of the answers to those questions.

In this installment of *Inside Deloitte*, Alexis Morrison-Howe, Sarah Murray, Steven Spaletto and Sara Clear of Deloitte Tax LLP examine the impact of the global intangible low-taxed income (GILTI) retroactive high-tax exclusion election on state income tax and future cash repatriation.

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