

The **Allen Consulting** Group

**A harmonised payroll tax system for NSW and
Victoria**

Estimated change in the administrative burden

February 2009

Standard Cost Model Report

The Allen Consulting Group

The Allen Consulting Group Pty Ltd
ACN 007 061 930, ABN 52 007 061 930

Melbourne

Level 9, 60 Collins St
Melbourne VIC 3000
Telephone: (61-3) 8650 6000
Facsimile: (61-3) 9654 6363

Sydney

Level 12, 210 George St
Sydney NSW 2000
Telephone: (61-2) 8272 5100
Facsimile: (61-2) 9247 2455

Canberra

Empire Chambers, Level 2, 1-13 University Ave
Canberra ACT 2600
GPO Box 418, Canberra ACT 2601
Telephone: (61-2) 6204 6500
Facsimile: (61-2) 6230 0149

Perth

Level 21, 44 St George's Tce
Perth WA 6000
Telephone: (61-8) 6211 0900
Facsimile: (61-8) 9221 9922

Online

Email: info@allenconsult.com.au
Website: www.allenconsult.com.au

Disclaimer:

While The Allen Consulting Group endeavours to provide reliable analysis and believes the material it presents is accurate, it will not be liable for any claim by any party acting on such information.

© The Allen Consulting Group 2008

Contents

<i>Executive Summary</i>	<i>1</i>
<i>Introduction</i>	<i>2</i>
<i>Background</i>	<i>3</i>
Context	3
Victoria NSW harmonisation of payroll tax	3
<i>Overview of the burden</i>	<i>8</i>
Administrative requirements	8
Trends/themes identified	11
Net results of the changes in the administrative burden	13
Consultation period	15
<i>Summary of SCM measurement exercise</i>	<i>16</i>
Cost parameter assumptions	16
<i>Empirical data collection methodology</i>	<i>21</i>
Selection process for the interviews	21
Businesses	21
Practitioners	21
Number of interviews	22
Expert opinion	23
<i>Empirical data standardisation process</i>	<i>24</i>
<i>References</i>	<i>25</i>
<i>Appendix A</i>	<i>26</i>

Executive Summary

NSW and Victoria enacted virtually identical payroll tax legislation with effect from 1 July 2007. This change introduced consistent payroll tax rules across both States (although the rates and thresholds continue to differ). The harmonisation initiative involved Victoria changing certain payroll tax definitions to be consistent with NSW definitions and NSW changing certain definitions to be consistent with Victoria.

Under the *Reducing the Regulatory Burden* initiative, the Victorian Government made a commitment to measure changes in the administrative burden of Victorian regulation using the standard cost model (SCM). The SCM was developed by the Dutch Government to provide a consistent method for estimating the administrative costs imposed on business by government.

Administrative costs are those costs incurred by firms to demonstrate compliance with state regulation or to allow the State Government to administer the regulation. These costs include costs associated with familiarisation with the requirement, record keeping to meet the requirement and reporting, including inspection and enforcement of regulation.

This report outlines the estimated change in the administrative burden arising from the changes to Victorian payroll tax definitions, using the SCM. The report does not seek to assess all the benefits of harmonising payroll tax legislation. The SCM is designed to measure only one aspect of the impact of changes to regulation, being the change in the administrative burden, and does not seek to measure the benefit or cost of change in its totality.

The present analysis is the first time the SCM has been used in Victoria to measure the change in the administrative burden arising from harmonisation of legislation between two jurisdictions.

Overall, harmonisation is estimated to save Victorian businesses \$1.5 million in administrative burden. Of the nineteen data requirements associated with the harmonisation, eight resulted in administrative savings and two resulted in an increase in administrative costs. It was estimated that the remaining requirements would not have a material impact on the administrative burden.

Introduction

1. NSW and Victoria enacted virtually identical payroll tax legislation with effect from 1 July 2007. This change introduced consistent payroll tax rules across both States (although the rates and thresholds continue to differ).
2. The harmonisation initiative involved Victoria changing certain payroll tax definitions to be consistent with NSW definitions and NSW changing certain definitions to be consistent with Victoria.
3. Major objectives underpinning this change included simplification of tax administration and reduction of red tape and compliance costs for businesses.
4. Under the *Reducing the Regulatory Burden* initiative, the Victorian Government made a commitment to cut the existing administrative burden of regulation by 15 per cent over three years, and 25 per cent over five years. Progress towards achieving targeted reductions in administrative burdens will be measured using the standard cost model (SCM). The SCM was developed by the Dutch Government to provide a consistent method for estimating the administrative costs imposed on business by government.
5. Administrative costs are those costs incurred by firms to demonstrate compliance with state regulation or to allow the State Government to administer the regulation. These costs include costs associated with familiarisation with the requirement, record keeping to meet the requirement and reporting, including inspection and enforcement of regulation.
6. The SCM is designed to produce indicative estimates of burdens, and to develop a strong understanding of the drivers of these burdens. The SCM is not designed to provide statistically robust data. In line with the Victorian Government's requirements, the SCM has been used in this report to measure the change in the administrative burden arising from changes to Victorian payroll tax definitions.
7. The report does not seek to assess all the benefits of harmonising payroll tax legislation either between Victoria and NSW, or nationally. The SCM is designed to measure only one aspect of the impact of changes to regulation, being the change in the administrative burden; it does not measure the benefit or cost of change in its totality.

Background

Context

8. Payroll tax is a levy on the value of certain forms of remuneration paid within a particular State by firms to, or on behalf of, their employees. Although now a State tax, payroll tax was initially introduced by the Commonwealth in 1941 and transferred to the States in 1971.
9. Interstate differences in either the tax bases and/or tax rates have been raised as a potential problem with State taxation arrangements (State Business Tax Review Committee 2001). The main concerns are the efficiency costs imposed by such differences, and the ability of a State to protect its revenue base in the face of interstate tax competition.
10. There have been only a limited number of studies looking at the compliance costs associated with payroll tax¹. In 2000–01 the Victorian Government commissioned a review of State taxes and charges paid by business. The State Business Tax Review Committee found that tax harmonisation across jurisdictions would:
 - reduce the incentive for inter-jurisdictional migration of tax bases
 - reduce administrative and compliance costs
 - protect state revenue bases
 - simplify legislation
 - reduce enforcement costs
 - increase tax equity (State Business Tax Review Committee 2001).
11. Recently there have been increased efforts to introduce a more harmonised payroll tax base. In addition to the changes in Victoria and NSW, from 1 July 2008 Tasmania introduced harmonised payroll tax legislation. The other jurisdictions have agreed to harmonise, initially over eight items (including grouping provisions and vehicle and accommodation allowance exemptions) with work continuing on harmonising arrangements in other areas (Treasury (Cth) 2008).

Victoria NSW harmonisation of payroll tax

12. In February 2007 the Victorian and NSW Treasurers announced their decision to harmonise payroll tax legislation. These changes were designed to benefit employers operating in both Victoria and NSW by providing the framework to develop more streamlined administrative arrangements.

¹ Pope, Fayle and Chen (1993) and the Queensland Chamber of Commerce and Industry (QCCI) (1996) found that the absolute cost of complying with payroll tax increases with firm size, but decreases as a proportion of revenue raised per employee. The QCCI study also found that 20 per cent of companies sought external advice to enable them to meet their obligations, with accountants being the main source of advice. These studies have shown that payroll tax is costly in a compliance and administrative sense (Pope 1994, QCCI 1996) and suggest harmonisation across jurisdictions could reduce costs significantly (Gabbittas and Eldridge 1998).

13. In the second reading speech introducing the Payroll Tax Bill in May 2007, the Victorian Treasurer noted that Victoria/NSW legislative harmonisation was the starting point to achieving greater administrative consistency. The Treasurer confirmed the Government was committed to payroll tax harmonisation with all states and territories, and that national reform would bring ‘even greater benefits to a greater number of taxpayers and further drive down the cost of doing business across jurisdictions.’
14. Prior to harmonisation, businesses operating in both Victoria and NSW, who were required to pay payroll tax, had to understand and comply with relatively different legislative regimes in each State. Table 1.1 outlines the situation before and after harmonisation arising from Victoria-specific changes to payroll tax legislation and the administrative activity required to be undertaken. Table 1.2 outlines the situation before and after harmonisation arising from changes to payroll tax legislation in Victoria and NSW. Changes to NSW legislation are outlined in Appendix A.

Table 1.1

PAYROLL TAX LEGISLATION CHANGES IN VICTORIA ONLY

Victoria	Before harmonisation	Administrative activity to be undertaken (before harmonisation)	After harmonisation	Administrative activity to be undertaken (after harmonisation)
Annual adjustment (Reconciliation)	Due date for the Annual Adjustment payment was 7 July.	<p>Affected businesses had to:</p> <ul style="list-style-type: none"> gather the information finalise calculations and lodge the information with the SRO by 7 July. <p>If businesses could not complete their annual reconciliation by 7 July, they could :</p> <ul style="list-style-type: none"> calculate an estimated liability and make an interim payment by 7 July revise their calculations and adjust for any errors and submit their finalised annual adjustment return by the end of July. 	Victoria extended the due date for the Annual Adjustment / Reconciliation to 21 July.	<p>Affected businesses need to:</p> <ul style="list-style-type: none"> gather the information finalise calculations lodge the information with the SRO by 21 July.
Anti-avoidance provisions	Previously there were no general anti-avoidance provisions.	Affected businesses did not have to pay payroll tax.	Victoria introduced general anti-avoidance provisions relating to agreements or arrangements which have the effect of reducing or avoiding payroll tax liability.	<p>The SRO determines whether the anti-avoidance provisions apply. If so, affected business need to:</p> <ul style="list-style-type: none"> gather and provide requested information finalise and transmit the information to the SRO
Community development employment scheme (CDES)	There was no exemption for wages paid under the CDES.	Businesses did not have to identify wages paid under a CDES.	Victoria introduced an exemption for wages paid to an Aboriginal person employed under an employment project under a Community Development Employment Project.	<p>Affected businesses self assess whether the exemption applies. If so, they need to :</p> <ul style="list-style-type: none"> gather information to quantify the wages that are exempt under this provision keep records to verify the exemption claim in the case of an audit.
Employee share acquisition scheme (ESAS)	Employee share schemes were not liable to payroll tax.	Businesses with share schemes did not pay payroll tax on the value of the shares.	In Victoria the value of an employer's contribution to any grant of a share or option to an employee, a director, former director, member of the governing body of the company or a former member of the governing body or deemed employee is now be subject to payroll tax.	<p>Businesses self assess whether their share scheme is taxable. Affected businesses need to:</p> <ul style="list-style-type: none"> gather the information finalise calculations transmit the information to the SRO on a monthly basis and/or do an annual return
Employees in voluntary emergency relief	There was no exemption for wages paid to employees participating in voluntary work for bush fires or emergency relief.	Business did not have to identify employees engaged in voluntary work for bush fires or emergency relief.	Victorian wages are exempt if they are paid or payable to an employee in respect of any period when he or she was engaging in emergency activities within the meaning of the Emergency Management Act 1986 as a volunteer emergency worker within the meaning of the Act.	<p>Affected businesses self assess whether the exemption applies. If so, they need to:</p> <ul style="list-style-type: none"> gather information to quantify the wages that are exempt under this provision keep records to verify the exemption claim in the case of an audit.
Non-monetary superannuation contributions	Non-monetary superannuation contributions	Businesses did not need to keep records of these payments for payroll tax	Victorian non-monetary superannuation contributions are now subject to payroll tax	<p>Affected business need to:</p> <ul style="list-style-type: none"> gather information on the value of their non-monetary

Victoria	Before harmonisation	Administrative activity to be undertaken (before harmonisation)	After harmonisation	Administrative activity to be undertaken (after harmonisation)
	were not taxable.	purposes.		super contributions <ul style="list-style-type: none"> finalise calculations transmit the information to the SRO
Refunds and reassessments	The period allowed for refund claims and reassessments was three years.	Affected businesses had to: <ul style="list-style-type: none"> gather the information finalise calculations transmit the information to the SRO — within three years.	The period for refunds and reassessments the period is now five years.	Affected businesses need to: <ul style="list-style-type: none"> gather the information finalise calculations transmit the information to the SRO — within five years.
Termination payments to non-employee directors and deemed employees	Termination payments to non-employee directors or deemed employees were not taxable.	Businesses did not need to retain records of these payments for payroll tax purposes.	Termination payments to non-employee directors and former directors and deemed employees under a relevant contract are now taxable.	Affected businesses need to: <ul style="list-style-type: none"> gather the information finalise calculations transmit the information to the SRO
Tracing provisions	Provisions requiring tracing of interests in corporations did not exist.	Businesses were not previously required to group themselves based on interests in other corporations.	Victoria introduced provisions that group an entity with a corporation if the entity has a controlling interest in the corporation.	Affected businesses need to self assess whether they are grouped under this provision. If so, they need to: <ul style="list-style-type: none"> gather the information finalise calculations transmit the information to the SRO on the basis they form a group for payroll tax purposes.

Table 1.2

PAYROLL TAX LEGISLATION CHANGES: NSW AND VICTORIA

NSW and Victoria	Before harmonisation	Administrative activity to be undertaken	After harmonisation	Administrative activity to be undertaken
Exemption for charities	Previously the Victorian exemption only applied to charitable bodies.	Non-profit bodies other than charitable bodies were required to pay payroll tax.	VIC and NSW have consistent exemption provisions: Victoria expanded its exemption to include wages paid or payable by non-profit organisations with benevolent, philanthropic or patriotic objects.	Affected organisations self assess whether they are exempt. If so, they need to: <ul style="list-style-type: none"> • keep records to demonstrate entitlement to the exemption in the case of an audit.
Fringe benefits	Taxable value of fringe benefits for payroll tax determined in accordance with ATO requirements (i.e. Type 1 benefits grossed up using Type 1 gross up rate and Type 2 benefits grossed up using Type 2 gross up rate.	Affected businesses had to: <ul style="list-style-type: none"> • gather the information • finalise calculations • transmit the information to the SRO on a monthly and/or annual basis 	VIC and NSW both changed how the taxable value of fringe benefits is determined. The taxable value is determined by grossing up all fringe benefits (ie. both Type 1 and Type 2 benefits) using the lower (Type 2) gross-up rate only. This differs from the ATO calculation and requires additional calculations to be completed.	Affected businesses need to: <ul style="list-style-type: none"> • gather the information • finalise calculations using the Type 2 gross-up rate only • transmit the information to the SRO on a monthly and/or annual basis
Grouping	Grouping provisions between Vic and NSW previously different.	Affected businesses had to: <ul style="list-style-type: none"> • gather the information • finalise calculations • transmit the information to the SRO on a monthly and/or annual basis — for entities for whom they had controlling interest of 50 per cent	VIC and NSW have consistent grouping provisions. Victoria changed the test for determining a controlling interest from '50 per cent or more' to 'more than 50 per cent'.	Businesses previously grouped under the former test need to self assess whether they still constitute a group. If not, they do not have to pay tax as a group.
Motor vehicle and accommodation allowances	Rates for motor vehicle and accommodation allowances were prescribed by Regulations and were different to NSW.	Affected businesses had to: <ul style="list-style-type: none"> • gather the information • finalise calculations and prepare the information (in different forms for different States) • transmit the information to the SRO on a monthly and/or annual basis 	VIC and NSW have consistent exempt rates for motor vehicle and overnight accommodation allowances, which are aligned to the ATO rate.	Affected businesses need to: <ul style="list-style-type: none"> • gather the information • finalise calculations (using rates now aligned with the ATO rates) • transmit the information to the SRO on a monthly and/or annual basis
Wages for work performed overseas	Wages paid in NSW or Victoria for the first six months of service performed in another country for a continuous period of more than six months were taxable. The wages paid for the subsequent period (i.e. seventh month and onwards) were exempt	Businesses were required to determine which employees were working overseas for more than six continuous months and paid in Victoria. Affected businesses had to: <ul style="list-style-type: none"> • distinguish the wages paid for the first six months of services performed overseas. • gather the information • finalise calculations • transmit the information to the SRO on a monthly and/or annual basis. 	VIC and NSW both exempt wages paid in NSW or Victoria for services performed in another country for a continuous period of more than six months (including the first six months). Therefore, businesses do not have to distinguish the wages paid for the first six months and declare these wages in their returns.	Affected businesses self assess whether they can claim this exemption. If so, they need to: <ul style="list-style-type: none"> • gather information on which employees were overseas and for how long • keep records to verify the exemption claim in the case of an audit.

Overview of the burden

Administrative requirements

15. The main administrative activities for businesses consist of:
 - gathering information and calculating payroll tax liability on a monthly basis and/or annual basis and submission of this estimate to the SRO
 - completion of an annual reconciliation return in July each year that calculates the actual payroll tax liability for the year.
16. The harmonisation was expected to have an impact on administration of payroll tax in two ways: one, by changing the way that the amount of payroll tax is calculated and two, by changing the way that information must be kept and recorded. Therefore, the SCM was broken into two information obligations.
17. Information obligation 1 includes all the changes to administrative effort required to calculate payroll tax. Information obligation 2 includes all the administrative effort required to keep records.
18. Information obligation 1 involves 18 data requirements. Information obligation 2 involves only one, as shown in Table 1.3.

Table 1.3

DATA REQUIREMENTS AND INFORMATION OBLIGATIONS

Information obligation 1	Payroll tax calculation and lodgement
Data Requirement 1	Understanding the obligations
Data Requirement 2	Exemption for charities
Data Requirement 3	Fringe benefits
Data Requirement 4	Grouping
Data Requirement 5	Motor vehicle and accommodation allowances
Data Requirement 6	Wages for work performed overseas
Data Requirement 7	Annual adjustment reconciliation
Data Requirement 8	Anti avoidance provisions
Data Requirement 9	Community Development Employment Scheme
Data Requirement 10	Employee share acquisition scheme
Data Requirement 11	Employees in voluntary/emergency relief
Data Requirement 12	Non monetary superannuation contributions
Data Requirement 13	Termination payments
Data Requirement 14	Tracing provisions
Data Requirement 15	Refund and reassessments
Data Requirement 16	Joint public ruling changes
Data Requirement 17	Joint private ruling changes
Data Requirement 18	Annual reconciliation form changes
Information obligation 2	Record keeping
Data Requirement 1	Record keeping

19. 'Understanding the obligations' was created as a separate data requirement as it was expected all businesses spend time or money understanding their payroll tax obligations. In other words, the cost of understanding their payroll tax obligations is captured here, rather than captured against all of the other data requirements. (The exception relates to the employee share acquisition scheme, as the cost of understanding this is estimated to be significant, and only applies to those firms with such a scheme.)
20. In the first 12 months following the harmonisation, it was estimated that all businesses would spend more time understanding their obligations than before the changes (ie. over and above 'business as usual' time spent keeping up to date with various taxation laws), but following that, businesses operating in both NSW and Victoria would spend less time (than before the changes) understanding their payroll tax obligations. This is because, for example, payroll tax officers could be confident that the rules applying in both States are identical in many regards.

21. Initial consultations provided data on the increase in time to understand the changes in year one. As the Better Regulation Unit note on uneven changes in the administrative burden requires estimation of an average when the impact of a regulation varies unevenly over time, further consultations were held to collect data on the longer-term impact of the changes. One small Victorian/NSW interviewee, one medium Victorian/NSW interviewee and one large Victorian/NSW interviewee were consulted. They estimated time savings per annum of 3, 3.25 and 3 hours respectively. Further, the medium sized interviewee was a practitioner, and was therefore able to provide estimates of the average time likely to be saved by that practitioner’s clients (of which 80 were medium sized Vic/NSW businesses). As these estimates did not vary significantly by size they were averaged to obtain an estimate for a normally efficient business.² A tax expert was also consulted, who validated these results.
22. Table 1.4 shows the calculations used to estimate the change in this data requirement. For all of Victoria it was estimated that understanding changes in payroll tax obligations would increase costs by \$12.7 million in the first year but then reduce aggregate costs by \$2.3 million each year in the following nine years. The total aggregate savings for understanding the requirement is therefore \$7.66 million and the annualised figure is \$0.77 million (\$7.66 million divided by 10).

Table 1.4

ESTIMATES FOR UNDERSTANDING OBLIGATIONS

Year	1	2	3	4	5	6	7	8	9	10	Total
One off costs ('000)	\$12 742										\$12 742
Ongoing costs ('000)		-\$2267	-\$2267	-\$2267	-\$2267	-\$2267	-\$2267	-\$2267	-\$2267	-\$2267	-\$20 406*
Total nominal change ('000)											-\$7664
Annual average change ('000)											-\$766

* Calculation differences due to rounding

23. The record-keeping requirement was created as a separate information obligation as all businesses are required to keep records associated with payroll tax. It was expected that changes in legislation would require taxpayers to change their record keeping requirements.

² ‘Victorian only’ businesses would not experience savings because they would not benefit in the same way businesses located in both jurisdictions would. Validating this finding, a tax expert said that businesses located in both jurisdictions would experience time savings in the future when the full scope of the harmonisation became evident. Payroll officers would become increasingly confident that they would not need to consult, for example, both the Victorian and NSW websites or both sets of legislation.

24. Like the impact of understanding obligations, the impact of the Employee Share Acquisition Scheme (ESAS) was estimated to vary over the ten-year period. In particular, one-off costs (in year one) were estimated to differ from ongoing costs (in years 2 to 10). One-off costs included the cost of understanding the change³ and amending administration systems. Ongoing costs included the annual costs of administering payroll tax on ESASs. One-off costs in year one were estimated to be \$521 010, the subsequent ongoing costs were estimated to be \$373 868. In aggregate, the estimated costs of the ESAS change is \$0.895 million or \$89 488 per year — as shown below.
25. All businesses were asked to estimate the one-off cost of understanding the change and amending systems and the ongoing costs of administration.

Table 1.5

ESTIMATES FOR ESAS OBLIGATIONS

Year	1	2	3	4	5	6	7	8	9	10	Total
One off costs	\$521 010										\$521 010
Ongoing costs		\$41 541	\$41 541	\$41 541	\$41 541	\$41 541	\$41 541	\$41 541	\$41 541	\$41 541	\$373 868*
Total nominal change											\$894878
Annual average change											\$89 488*

*Calculation differences due to rounding

Trends/themes identified

26. Interviewees identified that the change in the administrative burden is a result of additional savings associated with:
- *understanding the change in legislation*: the broad range of changes resulting from harmonisation required businesses to spend time understanding the scope and impact of changes and to also seek advice from practitioners which was costly in the first year. In subsequent years however, it would take less time to understand payroll tax processes and legislation for businesses operating in both NSW and Victoria. On balance therefore, harmonisation would lead to time savings.
 - *consistent grouping provisions*: lessening the test for determining controlling interest from '50 per cent or more' to 'more than 50 per cent' meant that some businesses became ungrouped and therefore some payroll tax officers were required to calculate payroll tax for only one company, rather than for the group, leading to time savings. No entities would have become grouped (if they were not grouped previously, under the former legislation) as a result of this change.

³ There is a separate cost for 'understanding the requirement' for the ESAS change because those businesses affected by it spent additional time understanding it over and above the time they spent understanding their obligations in general.

- *motor vehicle and accommodation allowances*: businesses identified in interviews that the rate calculation had been simplified as it was now consistent with the ATO rate calculation.
- *wages paid overseas*: businesses identified savings because payroll tax was not required to be paid on wages paid in NSW or Victoria for services performed overseas for more than six months. Previously businesses were required to gather the information, calculate and pay payroll tax for the wages paid for services performed overseas for the first six months (see Table 1.2).
- *the change in due date for the annual adjustment reconciliation*: prior to harmonisation some businesses would prepare a draft or interim return to meet the submission date of 7 July. This would then require re-work to finalise. Some businesses had to re-do their payroll tax reconciliations because they made errors due to the short amount of time provided to submit the return. Extending the due date therefore reduced the administrative burden.
- *introduction of joint public rulings* saved businesses time because they did not need to check both jurisdiction's websites for public rulings, but could read one ruling and be confident it applied in both jurisdictions.
- *annual reconciliation form changes*: the Victorian annual reconciliation form was streamlined and made consistent with the NSW form and this saved businesses time during lodgment.

27. The savings described above are offset by costs which are a result of:

- *changes to the way in which the fringe benefits tax is calculated*: changes to the formula and basis for calculation for fringe benefits has required some businesses to implement changed, and more complex, administrative procedures. Previously the taxable value of fringe benefits for payroll tax purposes was determined in accordance with ATO requirements (see Table 1.2).
- *inclusion of the employee share acquisition scheme*: the process for managing share schemes in Victoria was changed to bring it into line with NSW. This change required more detailed data management of individual employees' share entitlements.

28. A change in burden was predicted for the record keeping information obligation but actual results from interviews concluded that there was no change in the record-keeping burden. Record keeping for businesses consisted of managing the wage and fringe benefit details of individual employees. Although the tax formulas or rates applied in some cases changed, businesses reported no overall change in the process of managing this data or its volume. This was because they had to keep the information for other purposes such as for the ATO, or for their own internal use.

29. Interviewees did not identify administrative savings (or costs) associated with certain data requirements. While it would be expected that these changes would result in administrative savings (or costs) for some businesses, none of the businesses and practitioners interviewed identified any changes. These were:

- *the exemption for charities*: None of the businesses or practitioners interviewed noted any change in administrative burden due to the introduction of the charities exemption. It is likely that very few businesses/charities would be affected by this change.
 - *changes to Community Development Employment Scheme provisions*: None of the businesses interviewed employed under this scheme. The practitioners interviewed indicated that the number of businesses impacted would be small.
 - *employees in voluntary/emergency relief*: None of the businesses interviewed were aware of any employees undertaking relief work. One practitioner stated that in some cases businesses may not track this information if they considered the administrative overhead larger than the tax saving. This suggests the saving would not be substantial.
 - *non-monetary superannuation contributions*: None of the businesses interviewed used non-monetary superannuation contributions.
 - *termination payments*: None of the businesses interviewed had terminated deemed employees or directors under the old or new system so were unable to comment.
 - *tracing provisions*: None of the businesses interviewed considered the tracing provisions applied to them in the last 12 months.
 - *introduction of joint private ruling*: None of the businesses interviewed had applied for a private ruling in the previous 12 months and thus no businesses were able to estimate the time savings. Tax experts and the SRO suggested that joint private rulings would have a material impact on the administrative burden. Taking a desktop analysis approach administrative savings resulting from joint private rulings were estimated using SRO data on time and population. A time estimate provided by the SRO, derived from a previous survey, was used — businesses spent 7.5 hours drafting, finalising and sending private rulings to the SRO. The population for private rulings was derived by the number of private rulings provided by SRO, apportioned to the different type of businesses according to location and size.
30. Savings and cost estimates are provided in Table 1.6. These were derived by asking businesses how much time they spent/saved as a result of each change to the legislation. Their time estimate was multiplied by the average wage rate and then multiplied by the relevant population group.

Net results of the changes in the administrative burden

31. Overall payroll tax harmonisation between Victoria and NSW is estimated to save Victorian businesses \$1.5 million in administrative burden. The decrease in administrative burden was due to a decrease in Information Obligation 1. There was no increase/decrease in Information Obligation 2 (record-keeping) as all records were required to be kept for other purposes (see Table 1.6).

Table 1.6

ADMINISTRATIVE COSTS AND SAVINGS FROM HARMONISATION ATTRIBUTABLE TO VICTORIA

Savings		Explanation
Understanding	-\$766 441	This figure represents the time costs of understanding the change in the first year, less the time savings in the subsequent 9 years.
Motor vehicle and accommodation allowances	-\$313 662	This figure represents the value of the time savings associated with the change in the way the motor vehicle and accommodation allowances are calculated following harmonisation.
Annual adjustment reconciliation due date	-\$258 045	This figure represents the value of the time savings derived from the annual adjustment reconciliation due date being the same as the NSW due date.
Grouping	-\$89 717	This figure represents the value of the time savings for some businesses who are no longer grouped as a result of the harmonisation and therefore do not have to calculate and lodge payroll tax for the grouped entity.
Annual reconciliation form changes	-\$7501	This figure represents the value of the time savings derived from making the annual reconciliation form easier to follow and complete
Joint public ruling changes	-\$156 390	This figure represents the value of the time savings that occur because businesses no longer need to check both websites for public ruling information.
Wages for work performed overseas	-\$9823	This figure represents the value of the time savings to businesses who no longer needed to pay payroll tax on the wages for services performed overseas.
Joint private ruling changes	-\$46 065*	This figure represents the value of the time savings accruing to businesses as a result of no longer needing to apply for private rulings in both jurisdictions.
Costs		
Fringe benefits	\$106 526	This figure represents the value of the time spent calculating fringe benefits that occur due to the requirement to do a different type of calculation than before.
Employee share acquisition scheme	\$89 488	This figure represents the value of the time spent estimating the payroll tax to be paid on employee shares.
No change		\$ 0
Record keeping	\$0	This figure shows that there has been no cost to businesses in terms of record keeping as a result of the harmonisation change.
No estimates available		
Community Development Employment Scheme	—	This shows that no interviewee had experience with this change.
Exemption for charities	—	This shows that no interviewee had experience with this change.
Anti-avoidance provisions	—	This shows that no interviewee had experience with this change.
Tracing provisions	—	This shows that no interviewee had experience with this change.
Employees in voluntary/emergency relief	—	This shows that no interviewee had experience with this change.
Non-monetary superannuation contributions	—	This shows that no interviewee had experience with this change.
Termination payments	—	This shows that no interviewee had experience with this change.
Refund and re-assessment period changes	—	This shows that no interviewee had experience with this change.
TOTAL	-\$1 451 629	

* estimate was derived using SRO data

Consultation period

32. Consultation took place between June and October 2008. This included initial contact with interviewees in June and July, completion of initial interviews, follow-up contact in August and further consultation in September to get additional clarity on the operations of a normally efficient business. Consultation was mostly undertaken in face-to-face interviews using a standard set of questions. Some follow up consultations were undertaken by phone.

Summary of SCM measurement exercise

Cost parameter assumptions

Tariff

33. The tariff was calculated based on wages costs for staff within businesses and fees for professional services.
34. The average hourly wage rate for accountant salaries (\$74 829) was taken from *my.career.com.au*, using the default overhead percentage rate as advised in the Victorian Guide to Regulation (2007). The payroll salary provided by mycareer (\$58 589) was not used because it did not accord with interviews undertaken. That is, most interviewees advised that they managed other aspects of the accounts and their annual salaries were more similar to the accountant average salary than the payroll average salary estimate. Calculations were made as follows:

$$\$74\,829 / (44 \text{ weeks worked per annum} \times 41 \text{ hours worked per week}) \times 1.165 \text{ (labour on-cost multiplier)} \times 1.5 \text{ (overhead cost multiplier)}$$

$$= \$72.5 \text{ per hour}$$

Time

35. The time saving/cost estimates were provided by interviewees from businesses or from estimates on the 'average business' from practitioners.
36. Businesses and practitioners also gave estimates of the amount charged for external advice: businesses told us the amount billed by external advisors, and practitioners advised the amount they charged for advice on certain elements of the change.
37. Time estimates for monthly activities were multiplied by 11. Time estimates for the annual reconciliation were multiplied by 1. These figures were added together to get a total time estimate for a certain activity. On some occasions, businesses reported the time taken to undertake certain activities in aggregate. This time was then apportioned according to the percentage of time interviewees reported spending on each activity. On some occasions, businesses and practitioners reported time and cost estimates in terms of a range, e.g. between 7 to 10 hours. On these occasions, the estimate used was the middle of the range i.e. 8.5.
38. As noted above, for some of the data requirements, none of the businesses or practitioners interviewed had any experience of the change. Based on a desktop analysis, drawing on advice from tax experts and the SRO (see Table 1.7) it was considered that— for all but one of the changes⁴ — so few businesses would be affected that the aggregate figure would not be materially changed.

⁴ Joint private ruling changes.

Table 1.7

CHANGES THAT HAD AN IMMATERIAL IMPACT ON THE ADMINISTRATIVE BURDEN

Change	Reason for deciding that the change would have an immaterial impact on administrative savings/costs
Community Development Employment Scheme (CDES)	The SRO estimated that fewer than ten businesses employ under this scheme in Victoria based on the number of CDES organisations in Victoria (see www.workplace.gov.au)
Exemption for charities	Based on data held by the SRO, it is estimated that the expanded exemption would apply to less than ten non profit organisations.
Anti-avoidance provisions	Tax experts advised this change would not affect a significant number of businesses because the majority of businesses comply with their payroll tax obligations. The SRO confirmed that it has not applied anti-avoidance provisions in the last 12 months.
Tracing provisions	Tax experts advised very few businesses are grouped in this way. The SRO confirmed it has not grouped any entities under this provision in the last 12 months.
Employees in voluntary/emergency relief	The impact of this exemption depends upon the occurrence of bushfires or other emergencies, which varies each year. Employers self assess whether the exemption applies. SRO estimates few businesses claim the exemption each year.
Non-monetary superannuation contributions	Tax experts advised this change would not affect a significant number of businesses because few employees receive superannuation contributions in a non-monetary form. The SRO confirmed it is not aware of any instances where this has occurred in the last 12 months.
Termination payments	Tax experts advised this change would not have a significant impact on many businesses because termination payments to a non-employee director or deemed employee are infrequent. The SRO confirmed it is not aware of any instances where this has occurred in the last 12 months.
Refund and re-assessment period changes	The tax experts advised that few businesses would have occasion to seek a refund four or five years after an issue arose. The SRO confirmed that, in its experience, very few refund claims are received outside three years. In addition, SRO confirmed that the move from three to five years is being phased in and the impact to date has been minimal.

Population

39. A survey was used to establish the population for each data requirement. The survey was an ‘opt-in’ online survey attached to the annual reconciliation webpage on the SRO website. Individuals completing the annual reconciliation return were asked to identify which of the harmonisation changes applied to their business.
40. Specific population estimates were obtained outside of the survey for particular harmonisation changes where the SRO held more specific data. These were:

- the grouping change: The SRO updated 2208 employer’s records as a result of grouping related enquiries from 1 July 2007 to 30 June 2008. The SRO reviewed a sample of 200 of these updates to establish the proportion that resulted from the change in the controlling interest test. Of the sample, seven (3.5 per cent) no longer constituted a group as a result of this change. Extrapolating this to the total number of records, 77 businesses (3.5 per cent) have been excluded due to the harmonised change. This was taken to be the population.
- public rulings: The SRO had a public ruling subscriber list with 2271 payroll tax subscribers. This figure was apportioned to each segment of the population using the segmentation provided by the survey results.
- private rulings: 189 payroll tax rulings were completed in 2007–08 according to SRO records. This figure was apportioned to each segment of the population using the segmentation provided by the survey results.

41. Details of the size of payroll and location of business for each completed survey were obtained from the annual reconciliation return. The total survey sample size was 1700 businesses, or six per cent of the total number of businesses in Victoria paying payroll tax. Table 1.8 summarises the survey results.

Table 1.8

SURVEY POPULATION RESULTS

Location	Victoria	Victoria	Victoria	Victoria NSW	Victoria NSW	Victoria NSW
Size	Small	Medium	Large	Small	Medium	Large
Number	438	280	220	331	143	288
Percentage	25.8%	16.5%	12.9%	19.5%	8.4%	16.9%

Note: Size of businesses defined as follows: *small* as up to \$0.55m to \$1m in payroll in Victoria, *medium* as between \$1m and \$2m Victorian payroll and *large* as more than \$2m in Victorian payroll.

42. This segmentation was used as it was initially assumed that the change in administrative burden for businesses would be determined by:

- the size of payroll in Victoria
- the geographical coverage, with businesses operating only in Victoria impacted differently to those operating in both Victoria and NSW.

43. The extent to which the results varied according to size and/or geographical coverage varied depending on the data requirement. Five data requirements (fringe benefits, motor vehicle allowances, due date, wages paid overseas and reconciliation form) did not appear to vary according to size or location and thus averages were taken across all results. The other data requirements varied either according to size and/or geographical coverage:

- Costs associated with grouping and the employee share acquisition scheme increased with size and so averages were derived for each segment.

- Two data requirements appeared to vary significantly according to geographical coverage — joint public rulings and joint private rulings. This was because only businesses in both States would benefit from joint rulings. To account for this, averages were taken across the three Victorian/NSW segments.
 - Certain costs associated with understanding obligations varied according to business size and location. Increased costs (for the first twelve months) associated with understanding the changes did increase with size because larger businesses needed external advice — to account for this we took averages according to each segment. Further, while all businesses were expected to face increased costs in the first twelve months in understanding the changes, in the long term, businesses operating in both NSW and Victoria were expected to experience a reduction in the time/effort required to understand their obligations. To account for this, we only applied the average estimated saving to certain segments (i.e. only to businesses operating in both NSW and Victoria).
44. The results of the interviews incorporate estimated changes in administrative burden that arise from changes made to payroll tax provisions in both Victoria and NSW. To estimate the change in the administrative burden arising from changes to Victorian payroll tax provisions only, the following adjustments were made to the results of the business interviews:
- *Victorian only changes:* One hundred percent of the impact of these changes has been allocated to Victoria.
 - *Changes made in both NSW and Victoria:* Fifty percent of the impact of these changes has been allocated to Victoria. Fifty per cent was chosen as the default rate based on the assumption that the savings/costs were attributable equally to both jurisdictions.
 - *Understanding obligations:* Because these savings relate to all the legislative changes, they cannot be apportioned in the same way as above. Therefore it was necessary to determine an appropriate rate of apportionment to ascertain Victoria's share of these savings. This rate is calculated to be 83 per cent⁵.

⁵ The absolute impact of the changes in administrative burden was used to apportion these costs (for example, where there is a reduction in the burden of \$50 000 and an increase in the burden of \$75 000, the absolute change is represented as \$125 000). The proportion of the impact accruing to NSW associated with the joint changes (\$220 736) was divided by the total impact of all the changes (\$1 290 371, excluding the impact of understanding obligations) giving 17 per cent. The 17 per cent was then subtracted from 100 per cent, resulting in 83 per cent of the costs of understanding the obligations reported in the business interviews being attributable to Victoria. This does not mean that the full extent of savings for understanding obligations attributable to NSW is 17 per cent. To calculate the full extent of savings attributable to NSW, it would be necessary to also include the impact of understanding obligation for the NSW only changes (outlined in Appendix A) which were not reported in the business interviews. The detailed calculations are set out in the spreadsheet which accompanies this report.

45. During the SCM process, the project team considered further segmentation. In particular, consideration was given to separating businesses that obtained professional tax advice from those that did not. It was hypothesised that businesses seeking professional advice had more complex tax arrangements than those that did not, and would have significantly higher costs and thus should be considered as different 'normally operating businesses'. However, this hypothesis was not supported by closer analysis of the interview and survey results.
46. A compliance rate of 100 per cent was assumed because payroll tax is a legislative requirement.

Frequency

47. As payroll tax is lodged every year, a frequency of '1' was applied across all data requirements. As discussed earlier in the report, time estimates for monthly activities were multiplied by 11 and time estimates for the annual reconciliation were multiplied by 1. These figures were added together to get a total time estimate for a certain activity and then multiplied by a frequency of '1' to get an annual figure.

Empirical data collection methodology

Selection process for the interviews

48. Interviews were obtained in two steps. The SRO made initial contact with businesses and practitioners to obtain agreement to be interviewed. Using this list as a basis, the Allen Consulting Group team made contact to arrange an interview.
49. In total, the SRO obtained agreement from 21 businesses and 12 practitioners. Only a proportion of this number were available for an interview.

Businesses

50. The SRO used the 2006-07 Annual Reconciliations to identify businesses paying interstate wages and the White Pages (to identify those businesses with a NSW Office). A list of 52 businesses was identified under the specified categories.
51. The SRO made two separate efforts to gain an interview sample. In mid May, the SRO contacted 27 businesses with 21 agreeing to be interviewed (including at least two that fell in each of the specified category types).
52. After the ACG project team asked if further businesses could be identified, the original list of 52 was reviewed again in mid June, specifically to identify businesses that had payroll in excess of \$1 million. Another 6 employers were contacted but were not available for an interview. The SRO staff, answering general phone calls, also asked businesses within the relevant categories whether they would be willing to be interviewed. None of these businesses agreed to be interviewed.
53. The ACG team telephoned each contact a minimum of three times to schedule an interview.

Practitioners

54. Practitioners were also interviewed to provide data on the administrative burden in respect of their clients. Practitioners were asked to distinguish between their answers for different segments. For example, practitioners were asked what proportion of their clients were small, medium and large businesses (based on the size of their payroll) and where they were based, ie. only in Victoria or also in NSW. In some cases, the changes affected businesses in different segments equally — this explains why some results are identical across different segments. Practitioners were asked to estimate the savings/costs for the average business in each segment, based on their experience with their own clients.
55. As with the business interviews, the SRO made two separate efforts to develop a contact list of tax practitioners. Initially, the SRO contacted the practitioners who have regular payroll tax dealings with the office (which is a fairly small number). The majority of these were accounting firms (including larger, medium and smaller accounting practices). The sample also included 2 legal firms.

56. In the second round, the pool of potential interviewees was extended to include firms that had any dealings with the SRO and practitioners obtained from the list of attendees to the SRO Annual Reconciliation seminars (which were delivered in May and June 2008). The list of practitioners attending the TIA Annual States' Taxation Conference was also reviewed for any further potential interviewees.
57. Overall, the SRO approached 26 practitioners (including accounting firms and legal firms).
- 6 practitioners indicated that payroll tax was only a very minor part of their business and therefore they would not be able to make any useful contribution.
 - 10 practitioners were unavailable for interview.
58. The ACG team telephoned each contact a minimum of three times to schedule an interview.
59. Seven interviews were undertaken, with one practitioner excluded from the sample as they did not provide direct payroll tax advice to business.

Number of interviews

60. The number of interview results in each segment is outlined in Table 1.9. There were 12 businesses and 6 practitioners interviewed. Each practitioner provided interview results for several segments.

Table 1.9

NUMBER OF INTERVIEWS IN EACH SEGEMENT

Segment	Businesses interviewed	Practitioner results	Total number of interviews
Small, Victoria only	1	5	6
Small, Victoria and NSW	1	5	6
Medium, Victoria only	1	6	7
Medium, Victoria and NSW	4	5	9
Large, Victoria only	3	6	9
Large, Victoria and NSW	2	5	7
Total	12	32*	44

* six practitioners in total

61. A number of interviewees were consulted more than once to gather time estimates on changes to the annual reconciliation form. It was also necessary to contact a number of interviewees to gain information about the time/effort to understand payroll tax obligations brought about by harmonisation in the future. To this end two businesses, one practitioner and two tax experts were consulted to estimate the subsequent time savings after the first year following the harmonisation change. The businesses and practitioner (whose clients were medium and large Victorian and NSW businesses) estimated that the time saved in subsequent years would be, on average, three hours per year. Tax experts verified this estimate. They advised that understanding payroll tax legislation and processes would be less in future years as a result of the harmonisation.

Expert opinion

62. Toward the conclusion of the initial consultation period, two tax law experts who specialised in providing advice to taxpayers and tax accountants were interviewed to cross-check initial findings with tax law ‘theory’ and to validate the general findings of the interviews. The two experts were both supportive of harmonisation and said that more savings and benefits would materialise when all Australian jurisdictions harmonised aspects of their payroll tax legislation. In particular, they highlighted the potential benefits of harmonisation of private and public rulings.

Empirical data standardisation process

63. The data collected from the face-to-face interviews was standardised to provide an estimate for a normally efficient business. In the main, results of the empirical data collection were averaged to provide a single estimate for a normally efficient business for each of the six segments (either a weighted average or an overall average, depending on whether the cost varied by segment). The average was then multiplied by the population (identified from the survey or provided by SRO, depending on the data requirement) for that segment. While some estimates appeared to be outliers, due to the small numbers interviewed in some segments it was not considered possible to reliably exclude any particular results as an outlier. The one exception was in relation to record keeping costs (Information Obligation 2, data requirement 1). Only one business (out of a sample of 44) identified extra record keeping costs, for this reason it has been marked as an outlier and excluded from the calculation of the normally efficient business.
64. Other points to note about the standardisation process are:
- the normally efficient business was estimated by taking an average of time and cost estimates when the particular change applied to them. If a particular change did not apply to that interviewee (ie. that business did not have an ESAS and was therefore not affected) then their response was marked not as a 'zero response' but as 'NA' and was not counted in the process
 - as mentioned above, results were averaged across the entire dataset when results did not suggest that size or location mattered. When results appeared to be affected by size or location, then results were averaged across the respective segments.
65. Three survey respondents completed the survey indicating that all harmonisation changes applied to their businesses. This was assumed to be erroneous as it was considered highly unlikely that one business would be affected by all data requirements given so few businesses were affected by changes to the charities exemption, CDES and voluntary emergency relief (refer Table 1.7 for explanations). These responses were therefore excluded from the population sample.

References

- Buchanan, B. 1989, 'The harmonisation of State taxes: an interstate view' Chapter 8 in ATRF, *State Taxation: Assessing the NSW Tax Taskforce Report*, ATRF, Sydney
- Collins, D. 1990, 'Competition and harmonisation in state taxation', Chapter 2 in Walsh 9C (ed) *Issues in State Taxation*, Centre for Research on Federal Financial Relations, ANU, Canberra
- Gabbitas, O. and Eldridge, D. 1998 *Directions for State Tax Reform*, Productivity Commission Staff Research Paper, AusInfo, Canberra
- Government of Victoria, 2007, *Victorian Guide to Regulation*, Department of Treasury and Finance, Melbourne
- NSW Tax Task Force 1988, *Review of the State Tax System*, Sydney
- Pope, J. Fayle, R. and Chen, D 1993, *The compliance costs of employment-related taxation in Australia*, Research Study No. 19 ATRF, Sydney
- Pope, J. 1994 'Compliance costs of taxation: policy implications', *Australian Tax Forum*, 11 p 85-121
- QCCI 1996, *Regulatory Compliance Costs and Other Burdens, A Survey Report*, Queensland Chamber of Commerce and Industry, Brisbane, July/August
- State Business Tax Review Committee (2001) (Freebairn, J., Harvey, J. Townsend, K. Feely, N. Pollard, D). *Review of State Business Taxes* Victorian Department of Treasury and Finance
- Treasury, Commonwealth of Australia (2008) *Architecture of Australia's tax and transfer system* www.taxreview.treasury.gov.au Accessed September 2008
- Walrut, B. 1989, 1989, 'The harmonisation of State taxes: an interstate view' Chapter 8 in ATRF, *State Taxation: Assessing the NSW Tax Taskforce Report*, ATRF, Sydney

Appendix A

Table A.1

CHANGES TO NSW LEGISLATION

NSW	Legislation Change
Adoption/maternity leave	<ul style="list-style-type: none"> • Introduction of an exemption for adoption leave and maternity leave payments
Contractors	<ul style="list-style-type: none"> • Removal of the exemption for payments under a relevant contract exceeding \$800,000
Designated group employer	<ul style="list-style-type: none"> • Requirement for grouped employers to appoint a Designated Group Employer (DGE) to claim the benefit of the tax free threshold (deduction)
Employment agents	<ul style="list-style-type: none"> • Removal of the exemption provided to employment agents that on-hire staff to clients with wages below the \$600 000 tax free threshold
Financial planners	<ul style="list-style-type: none"> • Removal of exemption for wages paid to financial planners under the relevant contract provisions
Portable long service leave and redundancy schemes	<ul style="list-style-type: none"> • Contributions to a portable long service leave scheme and a redundancy or severance scheme will no longer be liable
Trust distributions	<ul style="list-style-type: none"> • Trust distributions will no longer be liable

Spreadsheet 1: SCM results

Regulation:
A harmonised payroll tax system for
NSW and Victoria

	Proposed Change to the Burden (Small Vic)				Proposed Change to the Burden (Small Vic/NSW)				Proposed Change to the Burden (Medium Vic)				Proposed Change to the Burden (Medium Vic/NSW)				Proposed Change to the Burden (Large Vic)				Proposed Change to the Burden (Large Vic/NSW)			
	Price	Frequency	Population	Cost of Existing Burden	Price	Frequency	Population	Cost of Existing Burden	Price	Frequency	Population	Cost of Existing Burden	Price	Frequency	Population	Cost of Existing Burden	Price	Frequency	Population	Cost of Existing Burden	Price	Frequency	Population	Cost of Existing Burden
	(Tariff x Time)	(Occurrences per annum)	(Number of businesses & not-for-profits)	(Per annum)	(Tariff x Time)	(Occurrences per annum)	(Number of businesses & not-for-profits)	(Per annum)	(Tariff x Time)	(Occurrences per annum)	(Number of businesses & not-for-profits)	(Per annum)	(Tariff x Time)	(Occurrences per annum)	(Number of businesses & not-for-profits)	(Per annum)	(Tariff x Time)	(Occurrences per annum)	(Number of businesses & not-for-profits)	(Per annum)	(Tariff x Time)	(Occurrences per annum)	(Number of businesses & not-for-profits)	(Per annum)
Information Obligation 1																								
Data Requirement 1 (understanding)	30	1	7034	212471	53	1	5315	282596	45	1	4496	203506	592	1	2296	1360089	1934	1	3533	6830888	1078	1	4625	4986165
understanding savings in Year 2+		1		0	-224	1	5315	-1188124	0	1		0	-224	1	2296	-513252	0	1		0	-224	1	4625	-1033880
Data Requirement 2 (charities)	0	1	0	0	0	1		0	0	1		0	0	1		0	0	1		0	0	1		0
Data Requirement 3 (fringe)	22	1	1044	22702	22	1	1236	26894	22	1	723	15717	22	1	691	15018	22	1	1236	26894	22	1	1863	40515
Data Requirement 4 (grouping)	0	1	11	0	0	1	17	0	0	1	7	0	-2500	1	8	-19154	-4703	1	11	-50451	-2500	1	24	-59378
Data Requirement 5 (allowances)	-193	1	273	-52795	-193	1	418	-80745	-193	1	321	-62111	-193	1	209	-40372	-193	1	353	-68322	-193	1	723	-139750
Data Requirement 6 (wages overseas)	0	1	0	0	0	1	32	0	0	1	0	0	0	1	64	0	0	1	0	0	-136	1	145	-19646
Data Requirement 7 (due date)	-28	1	2377	-67356	-28	1	1477	-41870	-28	1	1654	-46876	-28	1	739	-20935	-28	1	1397	-39594	-28	1	1461	-41415
Data Requirement 8 (anti-avoidance)	0	1		0	0	1		0	0	1		0	0	1		0	0	1		0	0	1		0
Data Requirement 9 (CDES)	0	1		0	0	1		0	0	1		0	0	1		0	0	1		0	0	1		0
Data Requirement 10 (ESAS)	0	1	16	0	0	0	32	0	0	1	48	0	543	1	112	60981	1711	0	32	16484	1535	1	289	443545
ongoing costs ESAS		1		0		1		0	544	1		0	109	1	112	12180	215	1	32	6872	78	1	289	22489
Data Requirement 11 (Emergency)	0	1	32	0	0	1	16	0	0	1	0	0	0	1	16	0	0	1	0	0	0	1	0	0
Data Requirement 12 (Non-monetary super)	0	1	32	0	0	1	32	0	0	1	0	0	0	1	0	0	0	1	16	0	0	1	48	0
Data Requirement 13 (Termination)	0	1	177	0	0	1	80	0	0	1	80	0	0	1	64	0	0	1	80	0	0	1	112	0
Data Requirement 14 (Tracing)	0	1	64	0	0	1	96	0	0	1	0	0	0	1	64	0	0	1	80	0	0	1	112	0
Data Requirement 15 (Refunds)	0	1	64	0	0	1	0	0	0	1	32	0	0	1	16	0	0	1	16	0	0	1	80	0
Data Requirement 16 (Public ruling)	0	1	585	0	-154	1	442	-67933	0	1	374	0	-154	1	191	-29349	0	1	294	0	-154	1	385	-59108
Data Requirement 17 (Private rulings)	0	1	49	0	-544	1	37	-20010	0	1	31	0	-544	1	16	-8645	0	1	24	0	-544	1	32	-17410
Data Requirement 18 (AAR form)	-1	1	2377	-1958	-1	1	1477	-1217	-1	1	1654	-1363	-1	1	739	-609	-1	1	1397	-1151	-1	1	1461	-1204
Information Obligation 2		1.00		0.00	0.00	1.00		0.00	0.00	1.00	4496	0.00	0.00	1.00	2296	0.00	0.00	1.00		0.00	0.00	1.00		0.00
Data Requirement 1	0.00	1.00	7034	113064.75	0.00	1.00	5315	-1090409.16	0.00	1.00	4496	108873.28	0.00	1.00	2296	815953.94	0.00	1.00	3533	6721619.30	0.00	1.00	4625	4120921.55

