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## Recent Canada-U.S. Tax Treaty Changes Impact Cross-Border Service Providers and Employees

The Canada-U.S. tax treaty was updated last fall when the Fifth Protocol to the treaty was signed in September. On July 10, 2008, the U.S. Treasury Department released the Technical Explanation to the Protocol—see the article in this publication entitled “Technical Explanation for The Fifth Protocol of the Canada-U.S. Tax Treaty Released”.

The Protocol contained a number of significant changes to the treaty that impact cross-border activities. This article will examine some of the Protocol changes that specifically impact cross-border service providers and cross-border employees and will highlight some further insights provided in the Technical Explanation.

### Cross-Border Service Providers

Under Canadian domestic law, a U.S. resident individual or company who is performing services in Canada is considered to be carrying on business in Canada and is subject to Canadian tax on this income. Similarly, a Canadian resident individual or company who is performing services in the U.S. is considered to have “income effectively connected with a U.S. trade or business” and is subject to U.S. tax on this income under U.S. domestic law. Under the current treaty, a resident of one country will only be taxable on business income (including income from performing services) if they have a permanent establishment in the other country. A permanent establishment is defined under the current treaty to include a fixed place of business through which the business of the taxpayer is wholly or partly carried on, such as an office.

Due to the increase in cross-border services performed, both the Canadian and U.S. governments have become concerned with protecting their tax base and, in particular, with ensuring that they can tax income from services performed in their country where a non-resident is spending a substantial amount of time there. In recent years, both the Canadian and U.S. authorities have been aggressive in arguing that service providers from the other country have permanent establishments in their country, and are therefore subject to tax there, even though it is not clear whether they are providing those

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services through a fixed place of business in their country. To provide more certainty in this area, the new Protocol contains a new deemed permanent establishment rule for service providers.

The Protocol introduces two new specific tests which if met, will deem a service provider to have a permanent establishment in the other country. Under the first test, a service provider resident in one country will have a permanent establishment in the other country if those services are performed by an individual who is present in the other country for 183 days or more in any 12-month period and during that period, more than 50% of the “gross active business revenue” of the enterprise (including revenue from active business activities unrelated to the provision of services) consists of income derived from the services performed by that individual in the other country. “Gross active business revenue” refers to gross revenues from active business activities that the service provider has charged or should charge, regardless of when the actual billing takes place or when the revenues are taxed.

Under the second test, a service provider will have a deemed permanent establishment in the other country if services are provided in the other country for 183 days or more in any 12-month period with respect to the same or connected project for customers who are resident of the other country or who maintain a permanent establishment in that other country and the services are performed in respect of that permanent establishment. Projects will be considered connected if they “constitute a coherent whole, commercially and geographically” from the point of view of the service provider (not that of the customer) and will depend on the specific facts and circumstances of each case. This rule is designed, in part, to prevent the use of potentially abusive situations in which work is artificially divided into separate projects or pieces to avoid meeting the 183 day threshold.

The Technical Explanation highlights the fact that the methods of counting the days for each test are slightly different—under the first test, physical presence during a day is sufficient whereas under the second test, only days during which services are provided by the enterprise in the other country are counted such that weekends, holidays and other non-work days do not count.

The deemed permanent establishment rule will be effective as of the third taxable year of the service provider that ends after the Protocol enters into force, giving cross-border service providers time to adapt to the new rules. If the Protocol is ratified in 2008, this change will apply for taxation years which begin January 1, 2010, for businesses with a calendar taxation year.

## Income from Employment

Under Canadian domestic tax law, when an individual performs employment services in Canada, the individual is taxable in Canada on this Canadian source income. Similarly, when an individual performs employment services in the U.S., U.S. tax has to be paid on this income under U.S. domestic law. The Canada-U.S. tax treaty, however, provides an exemption from the taxation of employment income received by the resident of one country in respect of employment income earned in the other country if certain conditions are met.

Under the current treaty, a Canadian resident individual who performs employment services in the U.S. will be exempt from U.S. tax on the employment income, if, in a calendar year, one of the following two tests is met:

- (a) The remuneration does not exceed \$10,000 (in the currency of that other State, which in this case would be U.S. dollars); or
- (b) The employee is present in the other country (in this case, the Canadian employee who is performing employment services in the U.S.) for a period or periods not exceeding in the aggregate 183 days in that year (referring to the calendar year) and the remuneration is not borne (i.e. allowable as a deduction in computing taxable income) by an employer who is a resident of that other State (i.e. a U.S. employer in this case) or by a permanent establishment or a fixed base which the employer has in that other State (in this case, a permanent establishment or a fixed base which the Canadian employer has in the U.S.).

(Note that these tests also apply to U.S. resident individuals who perform employment services in Canada to determine whether the income is exempt from Canadian tax).

The Protocol will change the second test, generally effective with respect to taxable years beginning after the calendar year in which the Protocol enters into force. While the \$10,000 threshold (applied on a calendar-year basis) for exemption will remain, the second exemption will now be:

- (b) The employee is present in the other country (in the case above, the Canadian employee who is performing employment services in the U.S.) for a period or periods not exceeding in the aggregate 183 days in any 12-month period commencing or ending in the fiscal year concerned, and the remuneration is not paid by, or on behalf of, a person who is resident of that other State (i.e. a U.S. person in this case) and is not borne by a permanent establishment in other State (i.e. a permanent establishment in the U.S.).

The new rule results in two significant changes from the current treaty. First, the 183 day test is no longer to be applied within a particular calendar year. For example, the exemption can be denied where an employee is present in the other country for a 183 day period which straddles two calendar years, but doesn't meet the 183 day test in any particular calendar year. For example, if a Canadian employee went to the U.S. on October 15th in year 1 and stayed in the U.S. until May 15th of the following year, under the current exemption in the treaty, they would have spent less than 183 days in the U.S. for each of years 1 and 2. Under the new test, they would have spent more than 183 days in the U.S. in a 12-month period that commenced in year 1 and ended in year 2 and therefore could not claim an exemption from U.S. tax on this employment income.

The second change is that the new exemption adds a new hurdle for the employee in that the requirement that

the remuneration be borne by an "employer" has been removed. Under the current exemption, an employee who is resident in Canada may be able to claim an exemption for remuneration received for employment services rendered in the U.S., even if a related entity resident in the U.S. bore the costs of the remuneration, where the entity that bore the costs was not the employer of the individual. Under the new exemption, the remuneration need not be borne by any employer—it need only be borne by a person who has a permanent establishment in the other State (the U.S. in this case). This change was made to respond to certain abusive cases involving the recharacterization of employment relationships.

*If you or your company is engaged in providing cross-border services, it is important to understand how these new rules may impact you. For more information on how these changes may affect you, contact your BDO advisor.*



## Technical Explanation for The Fifth Protocol of the Canada-U.S. Tax Treaty Released

On July 10, 2008, the U.S. Treasury Department released the Technical Explanation (TE) to the Fifth Protocol of the Canada-U.S. Tax Treaty (which was released on September 21, 2007). This is the first step that must be taken in ratifying the Protocol in the U.S.—the release of the TE coincided with the review of the Protocol by the U.S. Senate Committee of Foreign Relations. Canada ratified the Protocol on December 14, 2007.

With this first step out of the way, it is very possible that the Protocol could be ratified by the U.S. before the end of 2008. That said, concerns were expressed to the committee about certain provisions of the Protocol which could delay its ratification. One of the biggest concerns expressed was that under the new Protocol, Canadian Unlimited Liability Companies (ULCs) will no longer qualify for treaty benefits, which is a big concern for many U.S. investors into Canada who have used ULCs to hold their Canadian investments.

The TE clarified many aspects of the Protocol while leaving many questions unanswered, including the following:

- ◆ The elimination or reduction of withholding taxes on interest applies retroactively to January 1st of the calendar year in which the Protocol comes into force. If the Protocol is ratified in 2008, withholding tax on interest paid to unrelated persons will be reduced to 0% effective January 1, 2008 and a reduced 7% rate will apply on interest paid to related persons (with the rate being reduced to 4% effective January 1, 2009

and then eliminated as of January 1, 2010). Any tax that has been withheld in excess of what is required can be recovered by applying for a refund.

- ◆ Canada will continue to view a U.S. S corporation as a resident of the U.S. for purposes of the tax treaty and therefore S corporations will continue to be eligible for benefits under the treaty. There was a concern that S corporations would no longer be eligible for treaty benefits under the Protocol as an S corporation is generally treated as fiscally transparent for U.S. tax purposes, while it is viewed as a corporation for Canadian tax purposes.
- ◆ Canada, when determining the right of a U.S. resident to treaty benefits, will do so within its own framework. Applying this to a U.S. Limited Liability Company (LLC) means that only the LLC will be a Canadian taxpayer, and not the members of the LLC, as Canada treats an LLC as a corporation. This means that Canada will not require members of LLCs to file Canadian tax returns (the LLC, however, in determining whether treaty benefits are available, must look at the residence of the members of the LLC). This also means that in determining whether there is a permanent establishment in Canada, the activities of the LLC itself are considered and not the activities of the members of the LLC. If the LLC does not have a permanent establishment in Canada, then only the portion the LLC's income that belongs to its U.S. members

would be exempt from Canadian tax under the treaty. If the LLC has a permanent establishment in Canada, it is the LLC that will pay Canadian tax on its business profits, rather than its members.

- ◆ The denial of treaty benefits to certain hybrid entities used in cross-border tax planning, including ULCs, was not addressed in the TE. These changes are effective on the first day of the third calendar year that ends after the Protocol enters into force, to give taxpayers a chance to restructure arrangements that will be impacted by these changes (if the Protocol is ratified in 2008, this means that this change will be effective January 1, 2010). Any cross-border plans that use hybrid entities will

have to be reviewed to determine the impact these changes will have.

The TE also contained a number of clarifications for other items included in the Protocol. For a more detailed explanation of the Protocol changes, see our September 2007 *Fast Fact 07-04*, New Protocol to the Canada-U.S. Tax Treaty. Also, see the article in this edition of the *Tax Factor* titled “Recent Canada-U.S. Treaty Changes Impact Cross-Border Service Providers and Employees” which outlines the impact of the Protocol on cross-border service providers and employees. And, as always, do not hesitate to contact your BDO advisor.

## Changes Coming for Non-Residents Disposing of Taxable Canadian Property

The 2008 Federal budget contained changes that are intended to ease the compliance burden on non-residents who dispose of Taxable Canadian Property (TCP) in certain situations. Unfortunately, the proposed changes may only benefit those who transact with related parties.

### The Current Rules

Under Canadian tax rules, when TCP is disposed of by a non-resident, the purchaser must withhold a portion of the amount paid for the property and remit it to the government, unless the non-resident vendor obtains a clearance certificate (known as a section 116 certificate, which is the section of the Canadian tax rules which contain this requirement). While the definition of TCP is broad, the most common type of properties that are subject to these requirements are Canadian real estate and shares of private Canadian companies.

The rules require that a non-resident vendor of TCP apply for a clearance certificate by filing a prescribed form, either before the disposition, or not later than 10 days after the disposition. For capital gains, the vendor generally will have to remit 25% of the gain to the Canada Revenue Agency (CRA) to obtain the certificate, unless they can demonstrate that the gain will not be taxable in Canada by virtue of the provisions of a tax treaty (if the property sold is depreciable property, the withholding



tax will be higher for any recapture of previously claimed tax depreciation). The amount remitted is basically a withholding tax—the non-resident is still obligated to file a Canadian tax return to report the disposition of the TCP and calculate the actual Canadian taxes owing. A purchaser of TCP from a non-resident has an obligation to withhold and remit 25% of the proceeds of any amount paid for TCP unless the non-resident vendor has obtained the required clearance certificate (again, the withholding tax may be higher if the TCP sold is depreciable property).

These rules have led to a backlog at the CRA, meaning that it can take several months to obtain a clearance certificate.

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## Changes to Section 116

In an attempt to alleviate this backlog, the changes introduced in the Federal budget are as follows, effective for dispositions that take place after 2008:

**No Withholding Tax Required for Treaty-Protected Property** – Under the changes, if the non-resident vendor will not have to pay Canadian tax on the disposition of TCP because of an exemption under the provisions of a tax treaty, the purchaser will not have to withhold any part of the purchase price. This will most commonly apply to the disposition of shares of private Canadian companies—under many tax treaties Canada has with other countries, these capital gains are often only taxable in the country where the vendor is resident. If the disposition is between related parties, the purchaser must send to the CRA, within 30 days of the date of the transaction, a notice setting out basic information about the transaction and the vendor.

**“Reasonable Inquiry” Protection** – Under current rules, purchasers are protected from an obligation to withhold tax on dispositions of TCP if, after “reasonable inquiry”, they satisfy themselves that the vendor is resident in Canada. This rule will now be expanded to apply to purchases of TCP from a non-resident vendor if the following conditions are met:

- ◆ The purchaser concludes after reasonable inquiry that the vendor is, under the provisions of a tax treaty that Canada has with a particular country, resident in that country;

- ◆ The property would be treaty-protected property of the vendor if the vendor were, under the tax treaty, resident in the particular country, and
- ◆ The purchaser sends to the CRA, within 30 days of the transaction, a notice setting out basic information about the transaction and the vendor.

**Exemption from Filing Canadian Tax Returns** – As noted above, a non-resident must file a Canadian income tax return for any taxation year in which the non-resident disposes of TCP, even if no Canadian income tax is actually payable. Under these changes, the non-resident will no longer have to file a Canadian return if no Canadian tax is payable for the year, the non-resident isn’t liable to pay any Canadian tax for any preceding tax year (other than an amount for which the CRA has adequate security), and the TCP disposed of is either treaty-protected property or a certificate under section 116 with respect to the disposition has been issued by the CRA.

While these changes are welcome, they may only benefit non-residents who sell to related parties. Purchasers of TCP from arm’s length non-residents will likely continue to insist that the non-resident obtain a clearance certificate from the CRA for treaty-protected property or they will continue to withhold tax from the purchase price, because the purchaser will not want to take on the responsibility of ensuring that the vendor is eligible for exemption from Canadian tax under the provisions of a tax treaty.

*Contact your BDO advisor if you have any questions on how these changes impact you.*

## Tax Breaks for the Physically and Mentally Challenged

If your personal circumstances have recently changed and you have just learned that you or someone close to you has become either physically or mentally challenged, chances are you have already considered the financial obligations that are associated with this. If this is the case, you are also probably wondering if there are any tax incentives that you should be aware of. There are, fortunately, several tax measures, including tax credits, deductions and benefits that do provide support for physically and mentally challenged individuals. This article highlights some of these items and helps you determine which ones you or your loved one may be eligible for. When discussing tax credits, we have made reference to the federal income tax rules. However, most provinces offer some or all of the credits. For specific credit amounts, please see our publication *Tax Facts 2008* (available on [www.bdo.ca](http://www.bdo.ca)).

### Who qualifies for these tax incentives?

Before we begin, perhaps we should take a step back and determine who exactly qualifies for these tax incentives. To be eligible for many of the incentives, the taxpayer must generally be either “disabled” or “infirm”. Although these are common terms, they have a specific meaning for income tax purposes, and the distinction between the two is crucial. A disabled person, for purposes of the Disability Tax Credit (DTC), includes ... *an individual that has one or more severe and prolonged impairments in mental or physical functions, such that the individual’s ability to perform a basic activity of daily living is markedly restricted or would be markedly restricted but for life-sustaining therapy.*

Not all of the incentives that we will discuss require that the individual be disabled. Some of the credits we'll discuss require that the person be dependent on an individual because of mental or physical infirmity. Although the term "infirm" is not defined for tax purposes, it is generally considered to be a less onerous test than that used for determining whether an individual is disabled. For instance there is no requirement that the dependant have a severe and prolonged impairment as described above. It is important to talk to your BDO advisor to help you determine whether you or your family member is considered "disabled" or "infirm" for tax purposes.

## What Types of Tax Incentives are Available?

### Disability Tax Credit

The DTC is intended to provide a credit for non-itemized disability related expenses but is not based on any expenses incurred. If you have one or more severe and prolonged impairments in physical or mental functions, you may be entitled to claim the DTC. In order to claim the credit however, a prescribed form (T2201, Disability Tax Credit Certificate) certifying that your disability is severe and prolonged must be completed and signed by a health care professional.

If your spouse or a dependant is disabled, you may be able to claim the unused amount of their credit. As well, if you have a child under age 18 that is disabled, a supplemental credit can also be added to the base DTC. This supplement is reduced by child care and attendant care expenses in excess of a specific amount.

### Medical Expenses Tax Credit

You can claim eligible medical expenses that you incur for yourself, your spouse or common-law partner or your (or your spouse or common-law partner's) children who were under age 18 and were dependent on you for support. To claim this credit, there is no requirement that you or your relatives be disabled or infirm.

You must include your receipts for your medical expenses when you claim the tax credit, and you cannot claim expenses already claimed in a previous return. As well, the medical expenses claimed must all be paid within any 12-month period ending in the taxation year.

The CRA provides extensive details regarding the nature of expenditures that qualify as medical expenses. Of interest, you can claim as a medical expense certain costs associated with attendant care or care in an establishment such as a special school. Other costs that can be claimed as a medical expense include the cost of a specially trained animal for use by a person who is blind, or certain renovation costs.

### Disability Supports Deduction

If you have a physical or mental impairment, you may also be able to deduct the expenses that you incur in order to work, go to school, or do research for which you received a grant. In order to claim this deduction, you must complete Form T929, Disability Supports Deduction. The CRA provides an extensive list of expenses that can be claimed, some of which include optical scanners, teletypewriters, and certain tutoring services.

It is worth noting that some disability support expenses are also eligible to be claimed as medical expenses. Although you cannot claim amounts that you or someone else claimed as medical expense, you can split the claim between this deduction and the medical expense credit as long as the total of the amounts claimed is not more than the total of the expense.

### Amount for Infirm Dependant age 18 or Older

You can claim a dependant tax credit for a relative who is 18 years of age or older at the end of the year and who is dependent on you at any time during the year by reason of mental or physical infirmity. You may claim this credit even though the dependant does not qualify for the DTC. Having said that, the CRA does require that a medical doctor provide a statement supporting the infirmity (which you should keep on file). The amount of the credit is fixed and is reduced by the dependant's income in excess of a certain amount.

### Eligible Dependant Amount

If you supported a dependant (child, grandchild, brother or sister by blood marriage, common-law partnership, or adoption) who is mentally or physically infirm and you are unmarried or living apart from your spouse, it may be possible to claim the eligible dependant amount rather than the infirm dependant amount for one dependant. The amount of the credit is higher, but is reduced by the dependant's net income. The infirmity test doesn't apply for dependants under age 18.



### Caregiver Tax Credit

You can claim this credit if you maintain (alone or jointly with others) a self-contained domestic establishment which at some time during the year is the ordinary place of residence of yourself and another person who is a child, grandchild, parent, grandparent, sibling, aunt, uncle, niece, or nephew and is dependent on you due to a mental or physical impairment, or for a parent or grandparent who is 65 or older. Note that dependants other than a child or grandchild must be residents of Canada. The credit is based on a fixed amount and is reduced dollar for dollar by the dependant's income over a specified threshold.

### Special Circumstances - Caring for a Disabled Child

Caring for a disabled child can not only be difficult, it can be a financial hardship. However, in addition to the many tax credits and deductions that you and your family may be entitled to, there may be other deductions and benefits available to you and your child.

### Child Disability Benefit

If your child qualifies for the DTC, you may be eligible to receive the Child Disability Benefit (CDB). The CDB will be automatically calculated and included in the Canada Child Tax Benefit Payment for qualifying children. The CDB is based on net income and is a tax-free benefit. (For the period of July 2008 to June 2009, the CDB provides up to \$2,395 per year).

### Child Care Expenses

If you or your spouse or common-law partner pay someone to look after your child who has a mental or physical impairment, the spouse or common-law partner with the lower net income can deduct the expenses on their tax return. However, the expenses can only be claimed if they were paid so you or your spouse could earn income, go to school or do research during the year. If your child is eligible for the DTC, the deduction limit is \$10,000 per year. As well, it should be noted that the total deduction cannot exceed two-thirds of the claimant's earned income for the year.

### Children's Fitness Tax Credit

Since 2007, taxpayers have been entitled to claim a credit of up to \$500 for fees that relate to the cost of registering your or your spouse's or common-law partner's child in a prescribed program of physical activity. Under recently

enacted legislation, if the child qualifies for the DTC, and is under age 18, an additional credit amount of up to \$500 may be claimed where a minimum of \$100 is spent on registration fees in an eligible program.

### Registered Disability Savings Plan

The Registered Disability Savings Plan (RDSP) is a new plan that was introduced in the 2007 Federal budget that will allow funds to be invested tax-free until withdrawal. It was specifically designed to help parents and others save for the long-term financial security of a child with a disability.

The structure of the RDSP is similar to a Registered Education Savings Plan. Contributions that you make to an RDSP are not deductible; however, the investment income earned on the contributions is not subject to tax. The investment income earned will be included in the beneficiary's income when paid out of the RDSP. Payments from an RDSP must begin by or before the end of the year in which the beneficiary turns age 60. The payments themselves are subject to a maximum annual limit depending on the age of the beneficiary and the fair market value of the plan's assets.

You can set up an RDSP for a disabled child who is eligible for the DTC. Anyone including parents and grandparents can contribute to an RDSP; but all contributions are limited to a lifetime maximum of \$200,000, with no annual limit. Contributions to an RDSP will be permitted until the earlier of the end of the year in which the child attains 59 years of age, becomes deceased, no longer qualifies for the DTC or is no longer resident of Canada.

The Federal government has put two programs in place that are designed to enhance funds that have been contributed to an RDSP. Under the Canada Disability Savings Grant program, the Federal government will contribute funds equivalent to 100% to 300% of RDSP contributions, up to a maximum of \$3,500 annually depending on the net income of the beneficiary's family (a lifetime limit of \$70,000 applies). The government will also contribute up to \$1,000 annually as a Canada Disability Savings Bond depending on the net income of the beneficiary's income.

*If you or someone close to you is either mentally or physically challenged and has any questions regarding any of the items discussed above, contact your BDO advisor.*



**The Registered Disability Savings Plan is a new plan... that will allow funds to be invested tax-free until withdrawal**

## Are You Overpaying Employment Insurance Premiums?

If you employ family members in your business, do you review whether employment insurance (EI) premiums should be paid? We continue to hear of situations where the EI status of family employees is determined for the first time when the family member applies for EI benefits. If the government rules at that time that the employment relationship is non-arm's length in nature, then benefits are denied (a refund can be requested for some or all of the premiums previously paid).

For business people who employ family members, it makes more sense to determine their EI status now. Here are some suggestions:

- ◆ Where a family member is employed in a manner similar to that for arm's-length employees, and the family member wants to be eligible for EI benefits in the future, the goal will be to strengthen and document the arm's length characteristics of the

relationship to ensure that the employment relationship is insurable. In addition, applying for an EI ruling before you start paying premiums may make sense so that you know where you stand. If the government will insist the relationship is non-arm's length in nature, it is better to know that now.

- ◆ If a family member won't apply for EI benefits in the future, or the employment relationship has non-arm's length characteristics, the goal will be to document why the relationship is non-arm's length so that it won't be necessary to pay EI premiums. When you analyze a family employment situation, it's usually possible to identify factors indicating that the relationship is not arm's length.

For more information, see "When is Employment Income Subject to EI?" in the 2006-02 issue of *The Tax Factor* (available on [www.bdo.ca](http://www.bdo.ca)).

## T2s Now Required for Non-Taxable Corporations



Effective for taxation years ending after March 31, 2008, all corporations that are exempt from tax under section 149 of the Income Tax Act are required to file corporate tax returns (Form T2). If they don't, the Canada Revenue Agency (CRA) will stop paying GST rebates to them.

Technically, all incorporated entities are required to file a T2. However, many companies that were exempt from tax never filed T2s, and the CRA never seemed to care because they were exempt from tax. However, under compliance refund hold legislation that was introduced in the 2006 Federal budget, no refunds or rebates will be paid to any corporation that is behind in any of its

required tax filings —and that includes a T2 return.

This change applies to corporate entities that are exempt from paying federal income tax under subsection 149(1) of the Income Tax Act, in the following sectors:

- Municipalities
- Universities
- Schools
- Hospitals
- Non-profit organizations
- Federal crown corporations
- Indian band councils

Registered charities, Hutterites and provincial crown corporations are not required to file a corporate income tax return and are therefore not subject to the provisions of the compliance refund hold legislation.

*Contact your BDO advisor if you have any questions about this change.*

The *Tax Factor* is published quarterly by BDO Dunwoody LLP. Our goal is to keep you up-to-date on recent tax developments and offer practical advice on tax and business issues. Comments and suggestions should be addressed to National Tax, by Fax: **(416) 367-3912** or E-mail at [info@bdo.ca](mailto:info@bdo.ca). We invite you to visit our web site at [www.bdo.ca](http://www.bdo.ca) to find out more about our firm and the offices near you.

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