**Disclosed Practice Number X - Voluntary Disclosure Agreements (Adopted May __, 2017)**

**Background:** When a seller registers through the Streamlined Sales Tax Central Registration System (SSTRS), the seller is required to register in all of the Streamlined full member states. The seller also has the option of registering in the contingent and associate member states.

Some sellers considering registering through the SSTRS may have identified a possible past liability in one or more of the Streamlined states. Those sellers may have started the process of entering into a voluntary disclosure agreement (VDA) with one or more of the states to address any potential past liability. Although in many cases these sellers want to register and start collecting the appropriate sales and use taxes as soon as possible, they are concerned that registering through the SSTRS may adversely affect one or more of the VDAs they may be working on with the Streamlined states.

The purpose of these disclosed practices is to assist sellers in determining the earliest date the seller may register without that registration adversely impacting the outcome of the VDA(s).

**<u>Disclosed Practice X.1 – Determining the Earliest Possible Date to Register Without It Adversely Affecting a Voluntary Disclosure Agreement</u>**

X.1.a. A seller's voluntary disclosure agreement (VDA) will be adversely affected if the seller registers with the state prior to the seller (or its representative) submitting the state's VDA application.

X.1.b. A seller's voluntary disclosure agreement (VDA) will be adversely affected if the seller registers with the state after the seller (or its representative) submits the state's VDA application, but before either the seller or the state signs the actual VDA.

X.1.c. A seller's voluntary disclosure agreement (VDA) will be adversely affected if the seller registers with the state after the state signs the actual VDA, but before the seller signs it.