State of Wisconsin • DEPARTMENT OF REVENUE

2135 RIMROCK ROAD • Mail Stop 624A • P.O. BOX 8933 • MADISON, WISCONSIN 53708-8933 • 608-266-6466 • FAX (608) 266-5718
http://www.revenue.wi.gov

Scott Walker
Governor

Richard G. Chandler
Secretary of Revenue

Date: March 8, 2013

To: Interested Parties

From: Richard G. Chandler, Secretary of Revenue RGC

Re: Minnesota-Wisconsin Income Tax Reciprocity Study

Attached is a new study that has been completed by the Minnesota and Wisconsin Departments of Revenue about the effects of reinstating an income tax reciprocity agreement between the two states.

Summary

The study reported that Wisconsin would owe Minnesota approximately $69 million per year if a new reciprocity agreement were to be implemented with payments made to reflect the net revenue foregone by each state from taxes paid by taxpayers from the other state who work there, the same approach used for calculating payments under the prior agreement.

Background

Wisconsin would very much like to reach a new income tax reciprocity agreement that will allow taxpayers who live in one state and work in the other to file income tax returns in their home state only, rather than in both states as they do now. Taxpayers were allowed to file returns in their home state only under the prior reciprocity agreement which Minnesota canceled in 2009.

Minnesota cited two concerns when it canceled the prior agreement:

1. A cash flow concern, because Wisconsin made payments to Minnesota for the net tax revenue foregone by Minnesota under the agreement twelve months after the close of each tax year. The payments were made with a substantial interest payment, but Minnesota wanted payments made during the course of each tax year for cash flow reasons. Wisconsin has agreed to address this concern by making estimated payments during the course of each tax year, with a final reconciliation payment made by one state to the other when final calculations are made after the end of each tax year.

2. A concern that the amounts of the payments Wisconsin made to Minnesota were based on yearly calculations based on a benchmark study originally done in 1995 and were therefore based on outdated information. To address this concern, both states agreed to do an updated study, to be completed by March 1, 2013. That study has now been completed.

Results of Study

As indicated in Table 1, the new study has concluded the following, based on a detailed review of 2011 tax returns filed in both states:

- If the net revenue foregone by Minnesota as a result of a new reciprocity agreement was calculated the same way as under the old agreement, and if a new agreement would have been in place for tax year 2011, Wisconsin would owe Minnesota a net amount of approximately $69 million.

- The Minnesota DOR has now taken the position that it will not enter into a new reciprocity agreement unless Wisconsin pays it an additional amount above and beyond the net amount of revenue foregone that was paid under the old agreement. That additional amount would provide Minnesota with the additional revenue it now receives from a tax increase on Minnesota taxpayers caused by the absence of a reciprocity agreement. The increase is due to the fact that Minnesota does not allow its taxpayers a full credit for the amount of taxes paid to other states (the TPOS credit limitation).

  The study has concluded that the amount of this additional payment to the Minnesota treasury by Minnesota taxpayers is $6.0 million per year. Minnesota had previously said that it thought this amount was somewhere between $5 million and $15 million per year.

Wisconsin's position is that under a new reciprocity agreement Wisconsin should make payments to Minnesota to reflect the net revenue foregone by each state from payments by taxpayers from the other state who work there, calculated the same way as the payments were calculated under the prior agreement. The study has concluded that this amount is approximately $69 million, according to both the Minnesota and Wisconsin Departments of Revenue.

The Minnesota DOR position is that Wisconsin should pay Minnesota the net revenue foregone amount (now identified as $69 million) plus an amount to compensate the Minnesota treasury for the revenue it would no longer receive due to the rollback of the tax increase experienced by Minnesota residents when the old agreement was canceled (now identified as $6.0 million). Wisconsin's position is that our statutes do not allow us to make this additional $6.0 million payment, and it is unreasonable to expect Wisconsin taxpayers to send $6.0 million to Minnesota to reverse a tax increase imposed on Minnesota taxpayers by Minnesota's cancelation of the old agreement.

Next Steps

We believe it is very helpful to have the figures from the March 1 study. We have now addressed the concerns that Minnesota had about assuring that reciprocity payments would be calculated based on an up-to-date study.

The one remaining issue is the Minnesota DOR demand that Wisconsin pay an additional $6.0 million above and beyond the $69 million net revenue foregone amount. We would hope that the Minnesota Legislature would pass statutory language stating that Minnesota should enter into a new agreement without demanding this additional payment. Wisconsin stands ready to sign a new agreement if the Minnesota Legislature takes that very reasonable approach.

I hope this information is helpful. Please contact the Wisconsin Department of Revenue if you have questions.

Table 1

Fiscal Effect of Reinstating Income Tax Reciprocity March 1, 2013 Study Showing Effect for Tax Year 2011			
Effect on Minnesota Treasury		Effect on Wisconsin Treasury	
Revenue Foregone Before Refundable Credits	-105.3	+104.9	Revenue Gain Before TPOS Limitation
Revenue Gain Before TPOS Credit Limitation	+36.4	-35.8	Revenue Foregone Before Refundable Credits
Net Revenue Foregone by Minnesota (Amount to be Paid by Wisconsin Under Previous Reciprocity Approach)	-68.9	+69.2	Net Revenue Gain to Wisconsin (Amount to be Paid by Wisconsin Under Previous Reciprocity Approach)
Effect of Discontinuation of Refundable Credits for Wisconsin Residents	+1.2	-1.9	Effect of New Agreement on TPOS Payments for Wisconsin Residents
Effect of End of TPOS Credit Limitation for Minnesota Residents	-6.0	+0.0	Effect of Refundable Credits
Final Revenue Reduction to Minnesota Treasury	**-73.7**	**+67.3**	Final Revenue Gain to Wisconsin Treasury

Notes:

1. The "Net Revenue Foregone" line for Minnesota and the "Net Revenue Gain" line for Wisconsin represent the amount that would have been paid by Wisconsin to Minnesota under the previous reciprocity agreement, using the updated figures from the March 1, 2013 study. The $0.3 million difference between the two figures in the Minnesota and Wisconsin columns is due to slight differences in data used in the calculations by the Minnesota and Wisconsin Departments of Revenue.
2. The figures for "Revenue Gain Before TPOS Credit Limitation" and "Effect of End of TPOS Credit Limitation for Minnesota Residents" are based on Wisconsin DOR calculations based on Minnesota DOR figures. The net amount of those two figures was provided by the Minnesota DOR; the allocation between the two lines was projected by the Wisconsin DOR.
3. Minnesota currently pays $1.2 million per year in refundable credits to Wisconsin residents who work in Minnesota and who now file tax returns there. This is an amount that was not paid in the past, when the Wisconsin residents only filed in Wisconsin. This $1.2 million payment would stop if we entered into a new reciprocity agreement and the Minnesota treasury would retain this amount, and would result in $1.2 million of new revenue for Minnesota.
4. Wisconsin, unlike Minnesota, does not put any limit on the credit for taxes paid to other states that a Wisconsin resident can claim. However, in some cases, a Wisconsin resident's tax payments to Minnesota exceed their total Wisconsin tax liability, and they do not have any additional tax obligations in Wisconsin. In these cases, since the TPOS credit is not refundable, they do not receive the full benefit of the TPOS credit. Under the approach followed under the prior reciprocity agreement, the full amount of taxes owed by Wisconsin residents would be credited to Minnesota in making the net revenue foregone calculation. This would result in reduced revenue of $1.9 million for Wisconsin.

Minnesota-Wisconsin Income Tax Reciprocity Study

A Report Prepared Pursuant to 2009 Wisconsin Act 359

March 1, 2013

Wisconsin Department of Revenue, Division of Research and Policy

In cooperation with

Minnesota Department of Revenue, Division of Tax Research

Executive Summary

2009 Wisconsin Act 359 requires the Wisconsin Department of Revenue in cooperation with the Minnesota Department of Revenue to study income tax reciprocity between the two states. Table 1 below summarizes the results of the study based on 2011 income tax returns.

Table 1
Results of Minnesota-Wisconsin Income Tax Reciprocity Study, Tax Year 2011

	Estimates by State DOR	
	Minnesota	Wisconsin
Number of Returns		
WI residents working in MN	55,743	50,577
MN residents working in WI	23,940	24,346
Income Earned $M		
WI residents working in MN	$2,434	$2,356
MN residents working in WI	718	717
Tax Revenue Foregone Under Reciprocity $M		
WI Residents working in MN	$104.1	$103.0
MN Residents working in WI	30.4	35.8
Net Revenue Under Reciprocity		
Final Net Minnesota Loss	73.7	
Final Net Wisconsin Gain		67.3

Under reciprocity, Minnesota's revenue loss exceeds Wisconsin's revenue gain. The difference in revenue loss arises from the application of tax credits.

Table 2

Fiscal Effect of Reinstating Income Tax Reciprocity, $M			
Effect on Minnesota Treasury		Effect on Wisconsin Treasury	
Revenue Foregone Before Refundable Credits	-105.3	+104.9	Revenue Gain Before TPOS Limitation
Revenue Gain Before TPOS Credit Limitation	+36.4	-35.8	Revenue Foregone Before Refundable Credits
Net Revenue Foregone by Minnesota (Amount to be Paid by Wisconsin Under Previous Reciprocity Approach)	**-68.9**	**+69.2**	**Net Revenue Gain to Wisconsin** (Amount to be Paid by Wisconsin Under Previous Reciprocity Approach)
Effect of Discontinuation of Refundable Credits for Wisconsin Residents	+1.2	-1.9	Effect of End of TPOS Credit Limitation for Wisconsin Residents
Effect of End of TPOS Credit Limitation for Minnesota Residents	-6.0	+0.0	Effect of Refundable Credits
Final Revenue Reduction to Minnesota Treasury	-73.7	+67.3	Final Revenue Gain to Wisconsin Treasury

Background

From 1968 to 2009, Wisconsin and Minnesota recognized income tax reciprocity between the two states. Under the terms of the agreement, residents working in one state and living in the other would only have to file a single return with their home state.

The basic agreement was modified several times. In 1972, the original agreement was modified to include compensating payments. In 1976, the Institute for Social Research was commissioned to develop a methodology for calculating the compensating payments. That study also specified the amounts of the compensation payments for 1973 to 1976 and established a benchmark for future payments. This method was re-benchmarked again on 1983 tax returns and again for 1995 returns.

In 2002, the reciprocity agreement was modified to include interest payments.

Under the terms of the reciprocity agreement, Wisconsin paid Minnesota for their lost revenue plus interest for the delay in receiving the net income tax due. Table 3 summarizes the ten most recent payments.

Table 3
Minnesota-Wisconsin Income Tax Reciprocity Compensation Payments, Tax Years 2000 to 2009 in Millions of Dollars

Tax	Taxes Foregone by			Tax Amount Paid by	Interest Paid by	Total Paid by	
Year	Minnesota	Wisconsin	Difference	Wisconsin	Wisconsin	Wisconsin	Payment Date
2000	64.8	$16.9	47.9	47.9	0.0	47.9	Dec. 2001
2001	60.5	16.5	44.0	44.2	4.8	49.0	Dec. 2002
2002	59.8	16.7	43.2	42.7	3.5	46.2	Dec. 2003
2003	64.3	17.4	46.9	46.9	2.9	49.9	Dec. 2004
2004	72.2	18.5	53.8	53.7	3.1	56.8	Dec. 2005
2005	79.1	20.1	59.0	59.0	4.4	63.5	Dec. 2006
2006	84.0	21.5	62.5	62.5	6.5	69.1	Dec. 2007
2007	90.0	21.8	68.2	68.1	7.7	75.9	Dec. 2008
2008	81.5	20.2	61.3	61.6	5.3	66.9	Dec. 2009
2009	75.8	19.8	56.0	56.2	3.5	59.7	July 2011

In 2009, Minnesota requested that the agreement be revised to provide for earlier payment to Minnesota. The original request was for an acceleration of the compensation payments starting with tax year 2010. This would have increased Wisconsin's payments by $105 million on a one-time basis in FY11. The two sides failed to come to terms on modifying the agreement and on September 18, 2009, Minnesota Governor Tim Pawlenty informed Wisconsin Governor Jim Doyle that the Minnesota Commissioner of Revenue was exercising his authority to discontinue the income tax reciprocity agreement as of tax year 2010.

To restart reciprocity discussions, in May 2010, the Wisconsin Legislature adopted 2009 Act 359 requiring the Wisconsin Department of Revenue, in cooperation with the Minnesota Department of Revenue, to study income tax reciprocity. The Minnesota legislature responded with similar legislation the following year with the passage of Minnesota Laws 2011, First Special Session, Chapter 7, Article 1, Section 9. The legislatures directed the departments to determine (1) the number of residents of each state who earn income from personal services in the other state, (2) the total amount of income earned in each state by those taxpayers, and (3) the amount of tax revenue that would be foregone by each state if an income tax reciprocity arrangement resumed.

The two revenue departments agreed to use 2011 tax year data as the most current available. After preliminary discussions in April, the two departments established the protocols for data exchange for the appropriate tax returns. Data was exchanged between the two states on four occasions, June 2012, August 2012, November 2012, and January 2013.

The methodology and findings of the two departments are discussed in the following sections.

Methodology for the Minnesota Department of Revenue Study

The responses to the two reciprocity questions on the M1 were captured for both the paper and electronically-filed returns. The responses were entered during processing for all returns, not just those marked "yes".

Wisconsin residents filing a Minnesota return must complete Schedule M1NR for Nonresidents and Part-Year Residents. Minnesota residents claiming a credit for tax paid to Wisconsin must complete Schedule M1CR, Credit for Income Tax Paid to Another State. For paper returns, it was necessary to capture additional information during processing from Schedules M1NR and M1CR. For electronically-filed returns, existing procedures provided for the capture of all information from the schedules.

A separate work group was established to review the returns. An experienced employee from the Income Tax Division took a mobility position as project manager. Six temporary personnel were hired to work full time for the duration of the study. A conference room was converted into their work space. Work stations were set up with computers and access to the systems necessary to complete the task.

A computer program was written to select returns for review. The program identified all returns that *potentially* had reciprocity income. The manual review then identified the returns that *actually* had reciprocity income.

Each of the temporary personnel was assigned returns to review. For each return, a determination was made if the return would be affected by reciprocity. If so, the amount of income that would be subject to reciprocity was determined and entered. For paper returns, additional information from the M1NR and M1CR was also entered.

Several sources of information were used to determine the income that would be subject to reciprocity, including information provided by the Wisconsin Department of Revenue. In addition to the Minnesota income tax return, the determination included review of W2s filed by Minnesota employers, data from Wisconsin income tax returns, and W2s filed by Wisconsin employers. (Minnesota provided comparable information to Wisconsin from Minnesota income tax returns and W2s filed by Minnesota employers.)

The only returns that were not reviewed one-by-one were those that could be identified with certainty from the available information, which were electronically-filed returns by full-year Wisconsin residents whose only Minnesota-source income was wages. A total of 39,632 returns were identified in this manner.

For Wisconsin residents working in Minnesota who had income that would be subject to reciprocity, a program was written to determine the amount of Minnesota income tax that was attributable to reciprocity income. The tax calculated is the tax after all credits, both nonrefundable and refundable.

For Minnesota residents working in Wisconsin who had income that would be subject to reciprocity, a program was written to determine the amount of the credit for tax paid to Wisconsin that was attributable to reciprocity income.

Minnesota Department of Revenue Study: Summary of Results

Wisconsin Residents Working in Minnesota
For tax year 2011, 55,743 Minnesota income tax returns were filed by Wisconsin residents who earned personal service income of $2.434 billion in Minnesota. Of that total, 45,290 returns incurred a Minnesota tax liability on their personal service income.

Minnesota Residents Working in Wisconsin
For tax year 2011, 23,940 Minnesota returns were filed by Minnesota residents who earned personal service income of $718 million in Wisconsin. Of that total, 18,224 returns claimed a credit on their Minnesota return for tax paid to Wisconsin on their personal service income.

Revenue Impact*
There are more than twice as many Wisconsin residents who work in Minnesota as Minnesota residents who work in Wisconsin. For this reason, Minnesota would have a revenue loss under reciprocity.

Minnesota's net revenue loss would be the net of two amounts: the loss of the Minnesota tax on Wisconsin residents working in Minnesota and the gain from not providing to Minnesota residents a credit for tax paid to Wisconsin.

Table 4

Estimated Impact of Reciprocity on Minnesota Tax Revenue Tax Year 2011	
Loss of the Minnesota tax on Wisconsin residents working in Minnesota	-104.1 million**
plus: Gain from not providing to Minnesota residents a credit for tax paid to Wisconsin	+30.4 million
Net: Minnesota net revenue loss due to reciprocity	-73.7 million

* The revenue impact measures the difference between the current situation without reciprocity and what would occur if reciprocity had been in effect for tax year 2011. The revenue impact is before any payment that Wisconsin would make to Minnesota.
** The revenue loss of $104.1 million is a net number. The total loss of $105.3 million was offset by $1.2 million for returns where the low-income refundable credits reduced the tax below zero.

Methodology for the Wisconsin Department of Revenue Study

The Wisconsin Department of Revenue (WI DOR) study relied more on computer programming and less on the examination of returns by personnel. Wisconsin's Data Warehouse routinely captures more data from the Wisconsin paper returns. This provides more information electronically than was the case for Minnesota. As additional funding was not provided as part of the Wisconsin legislation requiring the WI DOR to study the impact of individual income tax reciprocity, WI DOR internally funded its study. Therefore, Wisconsin selectively examined individual returns.

A computer program identified returns with reciprocity income. The primary indicator for Minnesota residents with Wisconsin reciprocity income was a non-resident return indicating Minnesota as the state of residence and indicating wages taxable to Wisconsin. The primary indicator for Wisconsin residents with Minnesota reciprocity income was the presence of a credit schedule for tax paid to another state, listing Minnesota wages.

Multiple data exchanges were crucial to identifying additional reciprocity related returns as well as for purposes of data cleansing previously identified returns. The Minnesota Department of Revenue identified a number of returns that WI DOR could then verify programmatically or by assigning personnel to review the returns. WI DOR retained one temporary employee to selectively examine returns as necessary.

The three main return categories that were not otherwise incorporated from Wisconsin data are: 1) filers with self-employment personal service income, 2) Wisconsin residents with reciprocity income, but no Minnesota tax liability, and 3) Part-year residents who claimed a Minnesota credit for tax paid to Wisconsin.

The Wisconsin revenue gain from income tax reciprocity was calculated by writing a computer program that computed the impact of removing the credit for tax paid to Minnesota on reciprocity income. Similarly, the Wisconsin revenue loss from income tax reciprocity was calculated by writing a computer program that computed the impact of excluding the reciprocity income of Minnesota residents from Wisconsin income tax.

Wisconsin Department of Revenue Study: Summary of Results

Minnesota Residents Working in Wisconsin
For tax year 2011, 24,346 Wisconsin returns were filed by Minnesota residents who earned personal service income of $717,448,170 in Wisconsin. Of that total, 18,413 returns incurred a Wisconsin tax liability on their personal service income.

Wisconsin Residents Working in Minnesota
For tax year 2011, 50,577 returns were filed by Wisconsin residents who earned personal service income of $2,356,556,210 in Minnesota. Of that total, 38,534 returns had a reduced Wisconsin tax liability due to their personal service income earned in Minnesota.

Revenue Impact
Wisconsin would have a revenue gain under reciprocity because there are more than twice as many Wisconsin residents who work in Minnesota as Minnesota residents who work in Wisconsin.

Wisconsin's net revenue gain would be the net of two amounts: the loss of the Wisconsin tax on Minnesota residents working in Wisconsin and the gain from not providing to Wisconsin residents a credit for tax paid to Minnesota.

Table 5

Estimated Impact of Reciprocity on Wisconsin Tax Revenue Tax Year 2011	
Loss of the Wisconsin tax on Minnesota residents working in Wisconsin	-35.8 million
plus: Gain from not providing to Wisconsin residents a credit for tax paid to Minnesota	+$103.0 million
Net: Wisconsin net revenue gain due to reciprocity	+67.3 million

Comparing the Minnesota and Wisconsin Results

Table 6
Comparing the Results of Minnesota-Wisconsin Results, Tax Year 2011

	Estimates by State DOR Minnesota	Wisconsin
Number of Returns		
WI residents working in MN	55,743	50,577
MN residents working in WI	23,940	24,346
Income Earned $M		
WI residents working in MN	$2,434	$2,356
MN residents working in WI	718	717
Tax Revenue Foregone Under Reciprocity $M		
WI Residents working in MN	$104.1	$103.0
MN Residents working in WI	30.4	35.8
Net Revenue Under Reciprocity		
Minnesota Loss	73.7	
Wisconsin Gain		67.3

The estimates of earned income for both states are substantially close.

The differences arise in foregone tax revenue. Those differences result from the application and limit of tax credits.

As shown in Table 7 below, there is little difference in the estimates of Minnesota net revenue loss and Wisconsin revenue gain before applying the credits.

Table 7

Fiscal Effect of Reinstating Income Tax Reciprocity, $M			
Effect on Minnesota Treasury		Effect on Wisconsin Treasury	
Revenue Foregone Before Refundable Credits	-105.3	+104.9	Revenue Gain Before TPOS Limitation
Revenue Gain Before TPOS Credit Limitation	+36.4	-35.8	Revenue Foregone Before Refundable Credits
Net Revenue Foregone by Minnesota (Amount to be Paid by Wisconsin Under Previous Reciprocity Approach)	**-68.9**	**+69.2**	**Net Revenue Gain to Wisconsin** (Amount to be Paid by Wisconsin Under Previous Reciprocity Approach)
Effect of Discontinuation of Refundable Credits for Wisconsin Residents	+1.2	-1.9	Effect of End of TPOS Credit Limitation for Wisconsin Residents
Effect of End of TPOS Credit Limitation for Minnesota Residents	-6.0	+0.0	Effect of Refundable Credits
Final Revenue Reduction to Minnesota Treasury	-73.7	+67.3	Final Revenue Gain to Wisconsin Treasury

NB: Estimates of Minnesota gain before and after TPOS credit limitation are Wisconsin DOR calculations.

In Table 7, the largest adjusting entry is the Minnesota credit for Taxes Paid to Other States (TPOS). Minnesota residents working in Wisconsin receive a TPOS credit on their Minnesota taxes for payments to Wisconsin but only up to their Minnesota liability. The credit is also non-refundable, paid only until Minnesota tax liability is exhausted. The combined effect of these limits reduces affected taxpayers' credits by $6.0 million. Under reciprocity, this incremental Minnesota tax revenue on Minnesotans working in Wisconsin would be retained by Minnesota taxpayers and not paid to the Minnesota treasury.

Under reciprocity, this loss to the Minnesota treasury would be partially offset by the elimination of low-income refundable credits paid to Wisconsin residents. Minnesota, unlike Wisconsin, allows nonresidents to claim the state earned income credit (and other refundable credits).

Wisconsin also has a TPOS credit but recognizes the full amount paid to Minnesota until Wisconsin liability is exhausted. In the Table 7, $1.9 million is shown as the reduction in TPOS credits because it is non-refundable.

Comparing the Minnesota and Wisconsin Results to the Prior Agreement

By way of comparison, Wisconsin DOR prepared an estimate of the reciprocity payment that would be due Minnesota if the prior agreement remained in place for the 2011 tax year. The overall level of economic activity on both sides of the states' border is higher than estimated under the old method. Taxes foregone by the two states to the other state's residents is $12 to $15 million higher than estimated under the prior method.

However, the net compensation payment of the prior method would be similar to the findings in this report. The old methodology updated for tax year 2011 would have resulted in the compensation payment below.

Table 8
Minnesota-Wisconsin Income Tax Reciprocity Compensation Payments, TY2011
Prior Method of Calculation, Millions of Dollars

Tax	Taxes Foregone $M		
Year	Minnesota	Wisconsin	Difference
2011	92.0	22.8	69.2

This result is close to the estimates of Minnesota net revenue loss and Wisconsin net revenue gain before consideration of the credits shown in Table 3. It is also between the range of estimates of revenue losses and gains with consideration of the credit.

Acknowledgements

The extensive cooperation between the Minnesota and Wisconsin Departments of Revenue made this analysis possible.

The Wisconsin Department of Revenue wishes to recognize the invaluable contributions of our colleagues in the Minnesota Department of Revenue.

Tax Research Division Reciprocity Staff:

Linda Senechal	Project Leader) – Information Technology Specialist 3
Susan Thomas	Office and Administrative Specialist
Mark Davies	Office and Administrative Specialist
Tiffany Peterson	Office and Administrative Specialist
Matthew Wilford	Office and Administrative Specialist
Patricia Sanders	Office and Administrative Specialist
Spider Mann	Office and Administrative Specialist

Paul Wilson	Director, Tax Research Division
Rod Hoheisel	Assistant Director
Carolyn Carlson	Revenue Operations Specialist
Mike Reinartz	Revenue Operations Specialist
Eric Johnson	Senior Research Analyst

At the Wisconsin Department of Revenue, these individuals conducted the research and prepared this report.

Amy Boutelle and staff	Business Intelligence Services Section

Division of Research and Policy

Brad Caruth	Revenue Economist-Senior
Jake Jones	Research Assistant
John Koskinen	Chief Economist and Division Administrator