

**REPORT OF THE VIRGINIA
DEPARTMENT OF TAXATION**

Tax Clearance Study

**TO THE GOVERNOR AND
THE GENERAL ASSEMBLY OF VIRGINIA**



SENATE DOCUMENT NO. 7

**COMMONWEALTH OF VIRGINIA
RICHMOND
2008**



COMMONWEALTH of VIRGINIA

Department of Taxation

January 4, 2008

TO: The Honorable Timothy M. Kaine, Governor of Virginia and Members of the General Assembly of Virginia

RE: Tax Clearance Study

The Virginia Department of Taxation ("TAX") is pleased to transmit its report regarding the feasibility of requiring a certification that all tax obligations are paid prior to the issuance of or the renewal of a state license or permit. This report is required by Item 265 of the Appropriations Act for the 2006-2008 Biennium (2007 Acts of Assembly, Chapter 847). Please let me know if you have any further questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Janie E. Bowen".

Janie E. Bowen
Tax Commissioner

JEB/ams

Preface

Authority

Item 265 of the Appropriations Act for the 2006-2008 Biennium (2007 Acts of Assembly, Chapter 847) directs the Department of Taxation ("TAX") to study the feasibility of requiring a certification that all tax obligations are paid prior to the issuance of or the renewal of a state license or permit. This Item, as amended during the 2007 General Assembly Session, also requires TAX to make a final report to the Governor and the General Assembly for consideration by the 2008 Session of the General Assembly.

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Executive Summary

Item 265 E of the Appropriations Act for the 2006-2008 Biennium (2007 Acts of Assembly, Chapter 847) requires the Department of Taxation ("TAX") to examine the effectiveness of various alternatives for implementing a tax clearance certification. A tax clearance certification program requires some form of verification that a taxpayer has paid all tax obligations prior to the issuance or renewal of a state license or permit.

The alternatives for instituting a tax clearance certification program that were studied by TAX included: (i) requiring the applicant to certify that all tax obligations are paid and authorizing the certifying agency to verify that certification with TAX, (ii) requiring the applicant to obtain a tax clearance letter from TAX, and (iii) allowing TAX to obtain licensing information from certifying agencies and to maintain such information until a delinquency occurred, at which time TAX would notify the certifying agency of the delinquency.

TAX met with interested parties from the public and from state agencies that issue licenses. Based on the information and comments gathered during the course of the study, it does not appear to be feasible for the Commonwealth to institute a tax clearance system at this time. There are several practical reasons for this conclusion. Various state agencies issue numerous licenses of different types, using different procedures and different computer systems, which would require more than one type of tax clearance procedure. TAX would incur substantial costs to develop and administer the different tax clearance procedures and, in addition, each licensing agency would incur costs to modify its systems and procedures to suspend or revoke licenses for delinquent taxes. The impediment of incompatible computer systems may be alleviated in the future as the Virginia Information Technologies Agency implements a statewide information management plan.

Moreover, the delinquent taxpayers would have the right to contest the tax delinquency as well as the tax clearance procedures employed to suspend or revoke their licenses. The administrative hearings and litigation resulting from these disputed cases would also be costly.

Furthermore, there are legal issues regarding taxpayer confidentiality. Although there are provisions in the law that allow TAX to share taxpayer information with other agencies, these exceptions should be tightly controlled.

Tax Clearance Study Report

Introduction

In Virginia, many different agencies are responsible for licensing a wide variety of professions and businesses. Some of the major licensing agencies include the Department of Professional and Occupational Regulation (“DPOR”), which is responsible for issuing licenses to those working or having a business in twenty-four different professions, and the Department of Health Professions (“DHP”), which oversees sixty different types of health care professionals and entities. While licensing and regulating different fields is the primary function of these agencies, many other state agencies license individuals and businesses as a secondary part of their responsibilities.

Currently, Virginia does not require those who obtain state licenses or permits to provide any proof that tax obligations have been paid. In addition, there are no procedures in place that would allow a licensing authority to verify that all tax obligations of the applicant are current prior to the issuance of a license or permit, nor do the licensing authorities have statutory authority to refuse to issue or renew a license if the taxes of the licensee have not been paid. Thus, those who have not paid their tax obligations are able to use licenses obtained from the Commonwealth to generate income while they shift their fair share of the tax burden onto law-abiding taxpayers.

One way of combating this problem is to institute a tax clearance certification program. A tax clearance certification program requires some form of verification that all tax obligations have been paid prior to the issuance or renewal of a state license or permit.

Other States

Approximately twenty states have some form of program to verify that tax obligations have been paid prior to the issuance or renewal of a license (see Appendix B). Ten of these states, Hawaii, Idaho, Indiana, Iowa, Maine, Massachusetts, Nebraska, New Jersey, New York, and Washington, either have a limited tax clearance system, a weakly enforced system, or were unable to provide TAX with information regarding their programs. Because of these factors, TAX did not receive detailed information from these states.

The remaining ten states, Delaware, Illinois, Louisiana, Maryland, Minnesota, Missouri, Oklahoma, Oregon, Rhode Island, and Vermont, utilize tax clearance programs similar to the proposal that TAX was required to study and were able to provide TAX with information regarding how their tax clearance procedures work, how much revenue they capture, and any recommendations that they had for a state considering a similar system.

Out of the ten states, only four require direct action by the licensee. Illinois requires the licensee to obtain a tax clearance certification from the Department of Revenue, while Rhode Island and Vermont require the licensee to certify to the licensing agency that he or she is current with all tax obligations. The licensing agency may later verify this certification in some manner with the Department of Revenue. Finally, Louisiana requires the licensee who is applying for a new license to apply for a tax clearance with the Department of Revenue. If the licensee should not meet his tax obligations at a later time, the Department will notify the licensing agency and a future license renewal will be denied.

Five states, Maryland, Minnesota, Missouri, Oklahoma, and Oregon, require communication between the licensing agency and the taxing agency, but do not directly involve the licensee. In Maryland, the licensing agency must verify tax compliance when the licensee applies for or renews a license. In Minnesota, Missouri, and Oklahoma, the licensing agency provides the names of licensees to the tax agency, which then sends out notifications when there is a delinquency. Finally, Oregon allows the Department of Revenue to request information regarding licensees from the licensing agencies. The Department of Revenue will then notify taxpayers and the applicable licensing agency of any tax delinquencies.

The final state, Delaware, employs a unique system in that it does not involve either the licensee or the licensing agency. Instead, when a business has an outstanding tax liability of \$2,500 or more, the Division of Revenue will go to court in order to revoke the license of the delinquent business. In order to effectively use its resources, the Division of Revenue primarily focuses on habitual offenders.

Only four states were able to provide TAX with revenue information. Louisiana received approximately \$373,000 in its main office in Fiscal Year 2006. It did not have information from other offices. Maryland received approximately \$3.5 million in Fiscal Year 2006. Minnesota stated that it receives approximately \$500 per month from most licenses, but that it receives between \$10 million and \$15 million per year from liquor companies. Finally, Rhode Island received \$8 million during Fiscal Year 2005, but it estimated that it would receive \$6 million in Fiscal Year 2006.

The ten states had several recommendations regarding tax clearance programs. Three recommendations were repeated by several states. The first was to publicize the program in order to encourage taxpayer compliance. In addition, many of the states informed TAX that agency cooperation is crucial to the success of any tax clearance program. This is because, in order for the program to be effective, each agency must be prepared to share information with other agencies and to act on information received from other agencies. If all agencies are not willing or able to do so, the program will not be successful. Finally, several states recommended the use of an automated system. This is another aspect in which agency cooperation is so crucial. When the computer systems used by various state agencies are compatible, the tax clearance procedure may be more fully automated.

Public Meeting

The Department of Taxation ("TAX") held a public meeting regarding the tax clearance study on September 26, 2006. The meeting was attended by representatives from TAX, the Department of Alcoholic Beverage Control, the Medical Society of Virginia, the International Paper Company, the Department of Planning and Budget, the Virginia Hospital and Healthcare Association, Southern States Cooperative, the Virginia Chamber of Commerce, DPOR, DHP, Hunton and Williams, LLP, and the Virginia Society of Enrolled Agents. In addition, representatives from the Virginia State Bar, the Virginia Board of Accountancy, the Tax Executives Institute, the Virginia Bar Association, the Virginia Manufacturers Association, and the Virginia Society of CPAs were also invited, but did not attend.

During the meeting, TAX presented its findings regarding the tax clearance methods used by other states (see Appendix B). In addition, some of the recommendations made by other states were discussed. These included computerizing the tax clearance process, maintaining a high level of communication among state agencies, publicizing the tax clearance program, and ensuring that there is a process to manage those who cannot afford to pay their taxes.

The different approaches to the tax clearance system were also discussed. These were broken down in terms of who would bear the primary administrative burden. First, methods placing the burden on the applicant were examined. In this situation, the applicant would be required to certify that all tax obligations were paid when applying for a license or a renewal, or the applicant would be required to obtain a tax clearance letter from TAX.

Second, the group looked at tax clearance methods in which the burden is placed on the licensing agency. In that case, the licensing agency would be required to obtain a clearance from TAX or verify the applicant's tax certification in some other manner upon receiving an application for a license or renewal.

Finally, methods in which TAX would bear the administrative burden were examined. Under such a method, the licensing agencies would be required to routinely provide information on all applicants to TAX. TAX would then determine if there were any delinquencies and would direct the applicable licensing agency to revoke or refuse to issue a license when a tax was owed.

This background information generated a great deal of discussion among the representatives attending the meeting. It quickly became clear that instituting a tax clearance system would be more complex and expensive than anticipated. The specific concerns expressed during this meeting are discussed in depth below.

In addition to this public meeting, TAX sent an e-mail on April 13, 2007 detailing the status of the Tax Clearance Study. This e-mail informed those who had attended the

meeting that TAX was in the process of analyzing all of the information that was gathered at the meeting and through contact with the various state agencies and was compiling all of the information into a draft report.

State Agency Processes

When this study was first initiated, TAX immediately identified several state agencies, such as DHP and DPOR, which would clearly be impacted by a tax clearance proposal. At the tax clearance study public meeting, however, several other agencies that would possibly be impacted were identified.

As a result of this input, TAX created a list of thirteen state agencies that would possibly be affected by any potential tax clearance proposal. These agencies are:

- Department of Alcoholic Beverage Control
- Department of Professional and Occupational Regulation
- Department of Health Professions
- Department of Motor Vehicles
- Department of Education
- Department of Agriculture and Consumer Services
- Department of Environmental Quality
- State Corporation Commission
- Department of Criminal Justice Services
- Department of Charitable Gaming
- Department of Game and Inland Fisheries
- Virginia Lottery
- Department of Social Services

Although this list is not comprehensive, it provided a helpful sample which was used to study the impact of a possible tax clearance system. Representatives from TAX attempted to contact these agencies in order to establish the number of licenses issued by each one. In addition, the representatives from TAX inquired about the processes for issuing, renewing, and revoking licenses, and whether or not tax compliance is currently verified prior to the issuance or renewal of a license. Finally, the representatives from TAX asked about the types of computer systems used by each of the agencies. The information that was gathered indicates that:

- Most agencies oversee many different licenses. For example, a representative from DPOR stated that that agency issues over one hundred and eighty types of licenses.
- Agencies may be organized into semi-autonomous units, with each following separate statutory mandates to license and regulate public activity. For example, the Department of Environmental Quality and the Department of Agriculture and

Consumer Services are divided into several subsections that are each responsible for issuing and monitoring a number of different licenses.

- There is no common procedure used among the state agencies to issue, renew, or revoke licenses. For example, some agencies utilize paper applications, while others rely on an on-line process. There are also fundamental differences in the processes used to review license applications, usually attributable to the laws governing the particular license. Finally, even the processes used within a single agency may be different for the various licenses that it issues, especially when licenses are issued by different subsections or divisions within an agency.
- The information obtained by the licensing agencies is not consistent. In particular, several licensing agencies do not request an individual's social security number or home address. Lacking this information, TAX cannot match licensee and delinquent taxpayer names without considerable manual investigation.
- There is little, if any, similarity in the computer systems used by the state agencies. Once again, because of the subdivisions within the agencies, there are sometimes different computer systems used by the same agency. It must also be noted that this is an area that can change very rapidly. Several agencies, such as the State Corporation Commission and the Department of Criminal Justice Services, have indicated that they may be changing their computer systems in the near future.
- With some possible exceptions, no agency currently considers tax compliance relevant to carrying out its own statutory mandates. One example of an agency that does consider compliance is the Department of Alcoholic Beverage Control ("ABC"). That agency pointed out that when a determination of good moral character is required, tax compliance might be an element of that determination. In fact, at one time, TAX and ABC computer systems routinely exchanged information and ABC used tax compliance information as part of its license issuing process. When TAX upgraded its system in the 1980's, however, this information exchange capability was lost.
- Funding is a significant issue because many licensing agencies use the fees that they collect to fund their licensing activities. This issue was of particular concern to DHP and DPOR, as they are not supported by General Fund revenues. To the extent that any tax clearance procedure increases costs for these agencies, the agencies would have to increase the fees that they charge or receive General Fund appropriations.

Legal Concerns

Along with the practical concerns of developing and maintaining a workable tax clearance system, there are also legal concerns. One of the most important of these concerns is whether the rights of the affected taxpayers would be protected. This issue could arise in a variety of ways. For example, during the tax clearance study meeting,

several agencies asked what would happen if TAX were unable to find a taxpayer in order to notify him of the delinquency prior to the revocation of his license. In addition, some asked what would happen if the process to resolve the tax delinquency went on for a long time, during which the taxpayer may be deprived of the ability to earn a living through the licensed activity and the licensing agency may be required to monitor or participate in legal proceedings.

All taxpayers currently have the right to administrative and judicial proceedings to dispute the liability for taxes assessed by TAX. Any tax clearance process would also be required to contain additional rights to administrative and judicial proceedings to ensure that proper notice and procedures have been followed before a license is suspended or revoked.

These concerns present financial as well as legal problems. Several agencies raised concerns regarding who would bear the costs of the administrative hearings that would be required to take place. These hearings could become very costly depending on the number of taxpayers who were affected and the nature of the proceedings to resolve disputed tax delinquencies and the impact on a license renewal, suspension, or revocation.

An additional legal issue that was not discussed in light of these other concerns is taxpayer confidentiality. Under *Va. Code* § 58.1-3, the employees of TAX are prohibited from divulging confidential tax information acquired during the performance of their duties. Such a restriction would prevent TAX from releasing tax compliance information to other state agencies. This restriction is not absolute, as the law does allow TAX to share information with certain agencies for specific purposes.

TAX considers the confidentiality of tax information to be vital to Virginia's reliance upon voluntary compliance by taxpayers. If we cannot maintain this confidentiality, taxpayers may become less willing to disclose information related to their income and assets, which would make it very difficult for TAX to ensure that taxpayers were fulfilling their tax obligations. Thus, exceptions to taxpayer confidentiality should be tightly controlled.

Revenue Impact

TAX was unable to develop a revenue estimate for several reasons. First, TAX does not have reliable data on the number of licensees who are delinquent in their Virginia tax obligations. Second, TAX already has numerous compliance programs and actively collects delinquent tax assessments. We routinely compare Virginia tax filings with federal tax filings. Delinquent tax assessments will cause federal and Virginia income tax refunds to be offset against the delinquent tax. In fact, almost any payment by the Commonwealth will be offset against delinquent tax liability. While a tax clearance procedure would supplement these ongoing compliance programs, it is not clear how much new revenue would be generated that would not have been collected by existing programs.

Any new revenue might not be enough, however, to exceed the cost to TAX and the licensing agencies for developing and administering the tax clearance system. While the primary responsibility for a tax clearance system would clearly reside with TAX, any such system would have a significant impact on the operations of licensing agencies. For these reasons, it is unlikely that a tax clearance system would ever create a large revenue gain for the Commonwealth.

Conclusion

Based on the information that has been gathered, it does not appear to be feasible for the Commonwealth to institute a tax clearance system at this time. The number of agencies issuing licenses, the variety of licenses and the different procedures and computer systems involved would require multiple tax clearance procedures and could result in numerous administrative proceedings.

A tax clearance procedure is only feasible if it can be substantially automated. In order to do so, however, the licensing agencies would be required to make significant, time-consuming, and probably very costly modifications to their systems and procedures for a purpose that is unrelated to their mission. If it is determined that a tax clearance procedure should be pursued at some point, the issue of technological compatibility should be considered when reviewing systems requests that are made by the various state agencies in the future. While different computer systems are currently in use by state agencies, the Virginia Information Technologies Agency is in the process of assuming responsibility for state agency information systems and managing a statewide information management plan. When fully implemented, a statewide information management plan may remove the logistical impediment for a tax clearance procedure. At that time this issue could be revisited.

It must also be noted that a tax clearance system could create significant problems for businesses operating within the Commonwealth. Depending on the type of business, companies must often obtain several different types of licenses. Such a company could face a huge administrative burden if TAX required some form of tax clearance for every license. In addition, if a company were shut down because of a lack of compliance, this would not only have impacts on the actual company, but also on the employees and customers of that company.

The amount of new revenue from a tax clearance system is uncertain since it would supplement existing compliance programs that already collect substantial delinquent taxes.

Therefore, while this idea does have merit, for all of the preceding reasons, TAX recommends that the Commonwealth should not institute a tax clearance certification process at this time.

Appendix A

Item 265 E of the Appropriations Act for the 2006-2008 Biennium, as Amended (2007 Acts of Assembly, Chapter 847)

E. The Department of Taxation shall study the feasibility of requiring a certification that all tax obligations are paid prior to the issuance of or the renewal of a state license or permit. Specifically, the department shall examine the effectiveness of various alternatives for implementing this certification, including (i) requiring the applicant to certify that all tax obligations are paid and authorizing the certifying agency to verify that certification with the Department of Taxation, (ii) requiring the applicant to obtain a tax clearance letter from the Department of Taxation, and (iii) allowing the Department of Taxation to obtain licensing information from certifying agencies and to maintain such information until a delinquency occurs, at which time the department may notify the certifying agency of such delinquency. All other agencies of the Commonwealth, particularly the Department of Professional and Occupational Regulation and the Department of Health Professions, shall provide the names of licensees, the date of licensure, the length of time that the license continues, the date of license renewal, and any other information or assistance to the Department of Taxation for this study, upon request. A report shall be made to the Governor and the General Assembly for consideration by the 2008 Session of the General Assembly.

Appendix B
Tax Clearance Methods Used by Other States

State	Method Description	Revenue	Administrator's Recommendations
DE	<ul style="list-style-type: none"> • The Div. of Revenue can go to court to revoke the license of a business that has an outstanding tax liability of \$2500 or more • The Division attempts to go after habitual offenders • 30 Del. C. § 2124 	N/A	<ul style="list-style-type: none"> • Do not include loopholes in the statute • Publicize the program in order to increase voluntary compliance
IL	<ul style="list-style-type: none"> • Any individual who requires a tax clearance must fill out Form ITR-1 and send it to the Dept. of Revenue • Once the taxpayer is cleared, he will receive a form that he can send to the licensing agency • 215 ILCS 5/500-70 	N/A	N/A
LA	<ul style="list-style-type: none"> • The Dept. of Revenue notifies licensing agencies when a taxpayer is noncompliant • The agency will then deny the renewal of a license for a taxpayer who is noncompliant • Taxpayers applying for new licenses can apply for a clearance over the phone or through a written application • La. R.S. 26:80, La. R.S. 26:280, La. R.S. 27:306, La. R.S. 47:9060 	FY 06 - \$373,000 ¹ FY 07 - \$6,781 ²	<ul style="list-style-type: none"> • Receive statutory permission to send clearance directly to agencies after taxpayer application

¹ From the main office only

² Represents the first 1.5 months of FY 07 in the main office

State	Method Description	Revenue	Administrator's Recommendations
MD	<ul style="list-style-type: none"> • When a new business or an individual applies for or renews a license, the licensing board e-mails the tax compliance office • Tax compliance checks each applicant as well as the business itself • All renewal requests are checked against a tax database via computer • Md. Tax-General Code Ann. § 1-205 	FY 06 - \$3.5 million	<ul style="list-style-type: none"> • Computerize the process
MN	<ul style="list-style-type: none"> • The licensing agencies annually provide the Dept. of Revenue with the names of those holding licenses • If the taxpayer is delinquent, he gets a notice of intent to revoke. The taxpayer then has 30 days to either request a hearing or pay his taxes. If he does not do so, the licensing agency is notified and has 30 days to revoke the license. • If the information is provided before the renewal or issuance of the license, the DOR can stop the renewal or issuance and the taxpayer has no right to a hearing until after the license has been denied • Minn. Stat. § 270C.72 	<ul style="list-style-type: none"> • Approximately \$500/month • Receives \$10 to \$15 million per year from posting delinquent liquor companies 	<ul style="list-style-type: none"> • Agency cooperation • Broad terminology • Enforcement provisions for the agencies • Uniform formats for information provided by the agencies
MO	<ul style="list-style-type: none"> • The Dept. of Revenue sends a list of those who are delinquent with their taxes to the various licensing agencies • For the taxpayer to receive his license, he must give the agency a “no tax due” letter from the DOR • § 324.010 R. S. Mo. 	N/A	<ul style="list-style-type: none"> • Make the process automatic-computer databases, etc.

State	Method Description	Revenue	Administrator's Recommendations
OK	<ul style="list-style-type: none"> • The licensing agencies provide information regarding all renewing licenses to the Tax Commission one year prior to renewal • This is done either monthly or yearly • The Tax Commission notifies any licensee who is noncompliant • The licensee has 6 months to comply • After 6 months, if the licensee is still noncompliant, the Tax Commission notifies the licensing agency. • 68 Okl. St. § 238.1 	N/A	<ul style="list-style-type: none"> • Ensure cooperation among state agencies
OR	<ul style="list-style-type: none"> • The Dept. of Revenue may request information from licensing agencies • The DOR identifies noncompliant taxpayers and sends a notice to the taxpayer and the licensing agency • The agency will then refuse to reissue, renew, or extend the license until the DOR notifies the agency that the taxpayer is in good standing. • ORS § 305.385 	N/A	<ul style="list-style-type: none"> • Be careful about disclosure issues
RI	<ul style="list-style-type: none"> • Taxpayers must certify that taxes have been paid when applying for a license • Div. of Taxation receives name and SSN electronically from agency • Primarily using DMV, other agencies coming on board • Also check sales permits w/in own agency • R.I. Gen. Laws §§ 5-76-1 through 5-76-8 	FY 05 - \$8 million FY 06 - \$6 million ³	<ul style="list-style-type: none"> • Have mechanism to handle those who cannot pay taxes • Get other agencies involved • Make sure other agencies get/release SSNs

³ Estimated

State	Method Description	Revenue	Administrator's Recommendations
VT	<ul style="list-style-type: none"> • The taxpayer files a certificate of good standing at time of licensure or renewal • Dept. of Taxes requests info from licensing boards • Choose one or two boards a year • Pick up nonfilers and outstanding balances • 32 V.S.A § 3113 	N/A	<ul style="list-style-type: none"> • Communication among TAX, other boards • Organization – rotating schedule so that word gets out in each industry

Additional States with Some Form of Tax Clearance

- Hawaii (HRS §§ 103-53, 231-28, WCHR 16-77-10): The contractor's license board requires tax clearance letter by administrative rule. The real estate board requires a tax clearance letter as part of proof of financial responsibility for new applicants.
- Idaho (Idaho Code § 23-933): A liquor license may be seized for sales tax delinquency.
- Indiana (Burns Ind. Code Ann. §§ 4-30-8-2, 4-30-9-7, 25-1-1-1): There is a tax clearance procedure for many types of licenses, but most revenue comes from liquor licenses.
- Iowa (Iowa Code §§ 99F.7, 321.30, 331.553, 421.17): Tax delinquency information is shared with licensing agencies, but they generally ignore it.
- Maine (8 M.R.S. §§ 1016, 1018, 36 MRS § 175): Authority is available to prevent renewal of licenses, but the process is cumbersome (3 certified notices & court appeal).
- Massachusetts (ALM GL ch. 62C, §§ 47A, 49A): Applicants must certify tax compliance, but there is no enforcement except for private detective licenses.
- Nebraska (R.R.S. Neb. § 9-1,104): Tax clearances are required for charitable gaming only.
- New Jersey (N.J. Stat. §§ 54:50-26 through 54:50-26.3, 54:50-28): 2004 legislation allows revocation of licenses for tax liability. New Jersey was unable to provide any information when contacted, however.
- New York (NY CLS Tax §§ 5, 431, 502, 1137, 1607): Tax clearances are required to register certain vehicles, liquor and lottery and street vendors by agency agreements. Licensing agencies are required to provide information to the Tax Department.
- Washington (Rev. Code Wash. (ARCW) § 50.13.060): The Tax Department can enter data sharing agreements with other agencies, and licenses may be revoked for tax delinquency.

