**Private Letter Ruling**

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| **Ruling Number:** | **P-2001-050** |

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| **Tax Type:** | **Kansas Retailers' Sales Tax** |
| **Brief Description:** | **Procurement of temporary workers and management services by means of the Internet.** |
| **Keywords:** |  |
| **Approval Date:** | **05/31/2001** |

**Body:**

Office of Policy & Research

May 31, 2001

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XXXX
XXXX

RE: Your fax inquiry

Dear XXXX:

I have been asked to answer your e-mail. Your company, Temp-X, provides broad range of services for procuring temporary workers and management services by means of the internet.

You ask what the sales tax implications are for services that involve tracking worker hours and expenses that are billed to clients. No equipment or other tangible personal property is supplied with the temporary workers. Temp-X acts as an intermediary, with the client paying Temp-X and Temp-X paying the temporary service provider or the individual worker. Temp-X has no offices in Kansas.

The State of Kansas, unlike a number of other States, does not impose sales tax on services provided by temporary service providers. This means that for the Temp-X services that you describe, the billings to clients should not have sales tax added. Similarly, the billing to Temp-X from any temporary service provider for services provided within the Kansas should not have sales tax added to it. Please note that Temp-X, like all other non-taxable service providers, must pay sales tax on any property or taxable services purchased in Kansas.

This is a private letter ruling and is based solely on the facts provided in your request. If it is determined that undisclosed facts were material or necessary to make an accurate determination by the department, this ruling is null and void. This private letter ruling will be revoked in the future by operation of law without further department action if there is a change in the statutes, administrative regulations, or case law, or a published revenue ruling, that materially affects this private letter ruling.

Sincerely,

Thomas E. Hatten
Attorney/Policy & Research

**Date Composed: 06/25/2001 Date Modified: 10/11/2001**