

# TAXATION (MTAX)

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## MTAX 6405 - Taxation of Property Transactions (3 Credits)

This course focuses on the fundamental concepts regarding the taxation of transactions involving property, including concepts such as basis of property, realization and recognition of gain or loss, effects of taxing gains and losses from capital assets, depreciable status, amortization of intangible property, depreciation methods, property casualties and losses, limitations on passive losses, and non-recognition transactions. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

## MTAX 6415 - Employment Taxes and Related Topics (1 Credit)

This course explores existing employment tax risks and employment tax planning opportunities through appropriate compensation and entity structuring techniques, analyzes proper worker classification, and highlights preventive techniques to avoid personal liability. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 1 Credit.

Grading Basis: Letter Grade

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

## MTAX 6420 - Estate and Gift Taxes (3 Credits)

This course is an introduction to principles and practices associated with the taxation of estates, gifts, and other gratuitous transfers under Subtitle B of the Internal Revenue Code. Using relevant examples, this course also focuses on the practical aspects of completing IRS Form 706, United States Estate (and Generation-Skipping Transfer) Tax Return, and IRS Form 709, United States Gift (and Generation-Skipping Transfer) Tax Return. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

Typically Offered: Spring.

## MTAX 6425 - Taxation of S Corporations and Their Shareholders (3 Credits)

This course focuses on fundamental tax issues relating to S corporations and their shareholders arising from the formation, operation, and liquidation of S corporations. Course work includes an examination of pertinent federal income tax returns of a S corporation. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

## MTAX 6430 - International Taxation (3 Credits)

International taxation focuses on the U.S. taxation of cross-border transactions. A review of the Internal Revenue Code's basic international tax rules is covered, including residency rules, sourcing of income and expenses, taxation of in-bound transactions (FDAP and "effectively connected income" rules), overview of U.S. model tax treaty provisions, anti-deferral regimes, and foreign tax credits. Students are often required to study the tax regimes of another country to compare and contrast foreign tax laws to U.S. laws. A brief review of interest-charge domestic international sales corporations is often covered. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

Typically Offered: Summer.

## MTAX 6431 - Inbound International Taxation (3 Credits)

An inbound transaction deals with a foreign person (e.g., a foreign individual, partnership, or corporation) doing business in the U.S. This course begins by discussing that a foreign person is taxed on two types of U.S. income: (1) FDAP (generally, investment income) and (2) effectively connected income (business income). FDAP includes a foreign person investing in marketable securities, as well as key planning issues when a foreign person invests in U.S. real estate. The effectively connected income discussion includes the branch profits tax. Planning opportunities such as avoiding U.S. income tax when a foreign person exports goods into the U.S.; choice of U.S. business entity; and structuring U.S. business entities between different foreign tax systems (world-wide taxation by the foreign country or territorial taxation by the foreign country) are also presented. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

## MTAX 6432 - Outbound International Taxation (3 Credits)

Outbound international taxation addresses U.S. tax issues when a U.S. person (e.g., U.S. individual, partnership, or corporation) is investing or doing business abroad. For U.S. individuals working abroad, this course covers the foreign income exclusion and the housing exclusion. The foreign tax credit protects both the U.S. individual or business from double taxation, but only if correctly structured when dealing with closely held U.S. businesses. From a business perspective, the deferral aspects of a foreign corporation are covered, as well as the anti-deferral regimes of (1) a controlled foreign corporation with subpart F income and (2) the passive foreign income company (PFIC). Planning issues such as creating foreign source income, corporate reorganizations under IRC § 367 are also discussed. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6435 - Income Tax Accounting and Methods (3 Credits)**

Topics in this course include the adoption of and change in accounting periods; income recognition and deduction allowance under the cash and accrual methods of accounting; the time value of money and original interest discount rules; prepaid and contested income and expenses; income and deduction reversals; accounting method changes; installment sales; long-term contracts; inventory accounting, including LIFO, FIFO and manufacturers' inventories; and net operating losses.

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6440 - Tax Practice and Procedures (3 Credits)**

This course provides a study of the organization, policies, and procedures of federal and state taxing authorities. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6445 - Entrepreneurs' Tax and Finance (3 Credits)**

This course focuses on entrepreneurs and start-ups. Topics include choice of entity considerations regarding the proper business entity for conducting the new venture, tax efficient ways of raising capital, incentivizing employees, planning for retirement, and taking a successful company public. This course provides students with the tools and background to make intelligent, thoughtful decisions regarding tax and finance issues impacting the formation, operation, funding, and expansion of entrepreneurial ventures. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6455 - Tax Aspects Relating to Exempt Organizations (3 Credits)**

This course focuses on the statutory exemptions for "charities" and other entities organized under IRC section 501(c). It also addresses the political campaign activities, funds, and lobbying activities of political organizations and entities organized under IRC section 501(c); the "prohibited transactions" rules; private foundations; the "unrelated business income" tax; the dissolution of, and distribution of assets held by, exempt organizations; and the charitable contribution. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6460 - Advance Topics in Taxation (3 Credits)**

This course focuses on a variety of advanced tax topics for businesses and individuals. This course is offered on an infrequent basis. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6465 - State and Local Taxation (3 Credits)**

This course focuses on various state and local taxation issues, such as the constitutionality of certain state and local tax regimes; nexus or jurisdictional tax due process; allocation and apportionment formulae under various state and local tax regimes; business versus nonbusiness income; the multi-state tax compact; the "unitary" concept; residency definitions; nonresident income sources; sales of tangible personal property and their taxation, including the impact of sales and use taxes on selected transactions, such as interstate purchases and sales, drop shipments, purchases from and sales to state and federal governments, occasional or "casual" sales, leasing transactions, and construction and manufacturing transactions; retail and wholesale sales; valuation techniques for real and personal property for purposes of certain state and local property taxes; and administrative procedures applied by various state and local tax jurisdictions. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6470 - Professional Judgment and Ethical Decision Making in Accounting and Tax (3 Credits)**

The content of this course includes the following: the ethical responsibilities of accountants, both personal and professional; ethical dilemmas facing accountants; ethical theory; the various accounting codes of conduct and ethical guidance for accountants; and the application of ethical theory, codes of conduct, and professional standards. In addition, this course includes discussions on ethical considerations, mandates, and penalties germane to a tax accounting practice, with an emphasis on Treasury Department Circular No. 230; on tax penalties under IRC Code sections 6662, 6664, 6694, 6695, and 6696 as those penalties relate to taxpayers and tax return preparers; on the standards governing the issuance of tax opinions to clients, and on AICPA statements on standards for tax services. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6473 - Auditing for Taxes and Tax Fraud (3 Credits)**

This course provides an introduction to and guidance for creation of an effective audit program for tax-based systems, with a focus on auditing tax fraud. The tax audit is designed specifically to detect potential misreporting of income and deductions and potential tax fraud. This course focuses on various methodologies that allow auditors to develop standards, objectives and procedures to examine systematically tax returns and tax strategies for misreported tax items and tax fraud. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA within the Business School. Max hours: 3 Credits. Grading Basis: Letter Grade

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6475 - Accounting for Income Taxes (3 Credits)**

This course addresses financial accounting reporting standards for income taxes. Principal topics include an understanding financial statement disclosures, identification of permanent and temporary differences, and calculation of current and deferred tax provisions. Additional topics include uncertain tax positions and valuation allowances. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or NBD within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or NBD within the Business School.

**MTAX 6482 - Advanced Partnership Taxation (3 Credits)**

Advanced federal income tax course focusing on the taxation of partnerships and their partners. Topics: "substantial economic effect", allocation of debt to partners' bases, "hot assets", profits interests, related-party transactions, distribution "waterfalls", profit and loss allocation "waterfalls", and taxation of retiring partners. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or NBD within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or NBD within the Business School.

**MTAX 6485 - Advanced Partnership Taxation (3 Credits)**

This course is an advanced federal income tax course focusing on the taxation of partnerships and their partners. Topics often include discussions on allocations of partnership income and loss under the "substantial economic effect" and the partner's interest in the partnership rules, targeted capital accounts, allocation of debt to partners' bases, "hot assets", profits interests, related-party transactions, distribution "waterfalls", profit and loss allocation "waterfalls", and taxation of retiring partners. Students cannot receive credit for both MTAX 6485 and MTAX 6482. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6490 - Income Tax of Trusts, Estates, and Beneficiaries (3 Credits)**

There are five major income tax areas that are fundamental to a CPA or legal tax practice: (1) individual; (2) partnership; (3) C corporations; (4) S corporations; and (5) "fiduciary" taxation. This course focuses on the last of the core types of income taxation – fundamentally, the taxation of trusts, estates and their beneficiaries under Subchapter J of the Internal Revenue Code. There are three major areas covered by Subchapter J. First, the grantor trust rules deal with revocable trusts and, to many practitioner's surprise, many irrevocable trusts. Second, estates and irrevocable trusts that are not grantor trusts are governed by the distributable net income rules. Third, when someone inherits an asset that was not taxed to the decedent, such as a retirement plan, the income in respect of a decedent rules apply to the heir. This course examines each of these three major areas of income taxation under Subchapter J and focuses on the practical aspects of completing IRS Form 1041, U.S. Income Tax Return for Estates and Trusts, using real life examples. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits. Grading Basis: Letter Grade

Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6495 - Travel Study: Washington, D.C. Tax Experience (2 Credits)**

By petition only. This course is a travel program. Students will travel to Washington, D.C. to meet with representatives from the various governmental entities that influence federal taxation. In particular, students will meet with representatives (i) from the various Congressional committees and legislative advisory committees involved in drafting tax legislation, (ii) from the Internal Revenue Service and Treasury Department, and (iii) from the United States Tax Court and other courts that consider federal tax cases. Prereq: At least 6 credit hours of MTAX courses and a cumulative MTAX GPA of no less than 3.00. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 2 Credits.

Grading Basis: GRD

Prereq: At least 6 credit hours of MTAX courses and a cumulative MTAX GPA of no less than 3.00. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

**MTAX 6499 - Consolidated Group Returns (3 Credits)**

This course focuses on the preparation of consolidated group corporate tax returns filed pursuant to Internal Revenue Code section 1501 and the Treasury Regulations promulgated thereunder. Corporate affiliated groups are also discussed. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

MTAX 6500 - Advanced Corporate Taxation (3 Credits)

A study of the statutory and judicial tax rules and problems relating primarily to corporate reorganizations and commonly controlled corporations, with a special emphasis on the tax rules associated with restructuring of corporate entities in the context of corporate merger and acquisition transactions. Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: Grade of C (2.0) or higher in ACCT 6140 or ACCT 4410 or at least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

MTAX 6800 - Special Topics in Taxation (3 Credits)

Courses offered irregularly for the purpose of presenting new subject matter in Taxation. Consult the current 'Schedule Planner' for semester offerings. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

Repeatable. Max Hours: 9 Credits.

Grading Basis: Letter Grade

Repeatable. Max Credits: 9.

Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

MTAX 6840 - Tax Independent Study (1-3 Credits)

Permission of instructor required. Allowed only under special and unusual circumstances. Regularly scheduled courses cannot be taken as independent study. Prereq: At least 9 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Letter Grade

Prereq: At least 9 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.

MTAX 6939 - Tax Internship/Cooperative Education (1-3 Credits)

Supervised experiences involving the application of tax return preparation and tax planning concepts and skills in an employment situation. Prereq: At least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School. Max hours: 3 Credits.

Grading Basis: Satisfactory/Unsatisfactory

Prereq: At least 6 credit hours of MTAX courses. Restriction: Restricted to graduate business majors and NDGR majors with a sub-plan of NBA or CPA within the Business School.