

# FLORIDA ATLANTIC UNIVERSITY™

## Graduate Programs—COURSE CHANGE REQUEST

UGPC APPROVAL \_\_\_\_\_  
 UFS APPROVAL \_\_\_\_\_  
 SCNS SUBMITTAL \_\_\_\_\_  
 CONFIRMED \_\_\_\_\_  
 BANNER POSTED \_\_\_\_\_  
 CATALOG \_\_\_\_\_


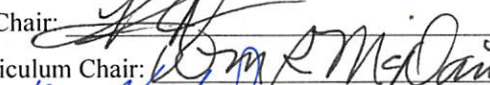



DEPARTMENT: SCHOOL OF ACCOUNTING	COLLEGE: BUSINESS
COURSE PREFIX AND NUMBER: TAX 6525	CURRENT COURSE TITLE: INTERNATIONAL TAXATION
CHANGE(S) ARE TO BE EFFECTIVE (LIST TERM): SPRING 2015	_____ TERMINATE COURSE (LIST FINAL ACTIVE TERM):

CHANGE TITLE TO:  CHANGE PREFIX FROM:                      TO:  CHANGE COURSE NO. FROM:              TO:  CHANGE CREDITS FROM:                      TO:  CHANGE GRADING FROM:                      TO:  CHANGE DESCRIPTION TO:	CHANGE PREREQUISITES/MINIMUM GRADES TO*:  CURRENT: Prerequisites: Graduate standing and TAX 6105.  PROPOSED: Prerequisites: Graduate standing and TAX 6065 AND TAX4011 or TAX6105.  CHANGE COREQUISITES TO*:  CHANGE REGISTRATION CONTROLS TO:  *Please list both existing and new pre/corequisites, specify AND or OR, and include minimum passing grade.
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Attach syllabus for ANY changes to current course information.

Should the requested change(s) cause this course to overlap any other FAU courses, please list them here.	Departments and/or colleges that might be affected by the change(s) must be consulted and listed here. Please attach comments from each.
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Faculty contact, email and complete phone number:  
 George R. Young, [gyoung@fau.edu](mailto:gyoung@fau.edu), (954) 236-1195

<b>Approved by:</b> Department Chair:  College Curriculum Chair:  College Dean:  UGPC Chair:  Graduate College Dean: 	<b>Date:</b> 9/10/14 9-24-2014 9-24-2014 10/5/14 10-15-14	<b>ATTACHMENT CHECKLIST</b> ♦Syllabus (see guidelines for requirements: <a href="http://www.fau.edu/graduate/facultyandstaff/programscommittee/index.php">http://www.fau.edu/graduate/facultyandstaff/programscommittee/index.php</a> )  ♦Written consent from all departments affected by changes
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Email this form and syllabus to [UGPC@fau.edu](mailto:UGPC@fau.edu) one week before the University Graduate Programs Committee meeting so that materials may be viewed on the UGPC website prior to the meeting.



**TAX 6525**  
**International Taxation**

**Professor Information**

Name: Dr. Claire Nash, CPA, *Assistant Professor of Accounting*  
Office Address: Boca Campus, DS  
101C e-mail address: [cnash8@fau.edu](mailto:cnash8@fau.edu)  
Phone Number: 561.297.2541 Course Site: <https://sso.fau.edu>

**Office Hours**

TBA and by appointment.

**Required Text and Materials**

Misey Jr., Robert J. and Michael S. Schadewald, *A Practical Guide to U.S. Taxation of International Transactions*, (CCH Eighth Edition, 2011), ISBN 978-0-8080-2682-2.

Pugh, Richard, Gustafson, Charles, and Robert Peroni, *International Income Taxation: Code and Regulations – Selected Sections*, (CCH 2014 Edition).

The Code and regs. can also be accessed on the IRS website at:

<http://www.irs.gov/taxpros/article/0,,id=98137,00.html>; or, on the commercial tax treatises sites available to you via the FAU library (*Intelliconnect* by CCH, RIA, Lexus/Nexus) using *EZproxy*. Use your owl card to access library resources via *EZproxy* at, <https://login.ezproxy.fau.edu/login?url=http://www.fau.edu/library>. Information about OWL cards is available at: [http://www.fau.edu/business-services/owl\\_card.php](http://www.fau.edu/business-services/owl_card.php).

**Required Materials:**

This course does not meet face-to-face. Students must have access to a computer to access course materials on the *eCollege* and *Blackboard* course sites, and for communication via e-mail. **School of Accounting (SOA) policies require each student to have an e-mail account through the university to be used with all correspondence in this course.**

**Course Description**

A survey of U.S. income tax laws applicable to U.S. citizens and corporations doing business abroad, as well as to foreign taxpayers investing in the U.S.



### **Course Prerequisites and Credit Hours**

*Prerequisites: Graduate standing and TAX 6065 AND TAX4011 or TAX6105.*

According to Florida State Regulation 6A-10.033, students must spend a minimum 2,250 minutes of in class time during a 3-credit course. Additionally, students enrolled in a 3-credit course are expected to spend a minimum of 4,500 minutes of out-of-class-time specifically working on course-related activities (i.e., reading assigned pieces, completing homework preparing for exams and other assessments, reviewing class notes, etc.) and fulfilling any other class activities or duties as required.

In accordance with Florida State Statute 6A-10.033, students should plan to spend at least 2 to 3 hours preparing for each hour of class time normally scheduled for a 3-credit course. *For a fully online course, that is 2 to 3 hours in addition to the time that would normally be spent in the class room.* The requirements for this course are designed to meet the state in-class and out-of-class time requirements.

### **Supplemental Course Description**

The course is designed to provide students with an introduction to U.S. taxation of U.S. firms, citizens, and residents with foreign source income, and U.S. taxation of foreign firms and individuals doing business within the United States.

Increasing global integration of business operations and financial markets means that tax professionals are increasingly confronted with cross-border transactions and tax laws affecting international transactions of individuals and multinational corporations. Even smaller businesses have found that they must compete in international markets in order to earn higher profit margins. Tax is, in general, one of the higher costs of doing business. The idea of “the government as a business partner” is especially germane for multinational firms that deal with governments in many jurisdictions. Tax professionals must be knowledgeable about the tax consequences of international transactions.

### **Course Learning Objectives**

The objectives of this course are to provide a basic understanding of how to:

1. Mitigate the double taxation of foreign source income through the foreign tax credit.
2. Choose the form of entity through which to do business outside the United States.
3. Set up operations to defer or eliminate U.S. taxation of foreign source income.
4. Repatriate foreign earnings to the United States.
5. Set a transfer price for intercompany sales of goods and services.
6. Comply with FIT requirements for sending U.S. employees abroad.
7. U. S. taxation of the activities of foreign corporations, nonresident alien individuals, and other foreign persons doing business in the U.S.



### Course Resources

Tax research treatises (*Intelliconnect* by CCH, RIA, etc.) are available to you via the FAU library to facilitate your understanding of tax compliance and the completion of course assignments requiring tax research.

### Grading Scale

A	93% to 100%	B+	86% to 89%	C+	76% to 79%	D+	66% to 69%
A-	90% to 92%	B	83% to 85%	C	73% to 75%	D	63% to 65%
		B-	80% to 82%	C-	70% to 72%	D-	60% to 62%
						F	Below 60%

The grade "C" reflects an **average** command or grasp of the material covered in the course. The grade "B" reflects an **above average** mastery of the material and the grade "A" indicates an **excellent** mastery of the material. The final semester grade will be determined by reference to the percentage of points earned by the individual student in relationship to the total possible points for the semester.

### Course Evaluation Method

#### Course Methods:

**Weekly Assignments:** Weekly assignments are available online on the TAX 6525 *eCollege* course site and are designed to meet the state in-class and out-of-class time requirements. It is important that you approach the course assignments like accounting professionals. Professionals do the task they are expected to do, and strive for high quality in all they do. One of the most frequent requests of instructors by potential employers, is to describe the student's work ethic. Course performance is often an indicator of professional performance. A professional fully understands the importance of meeting or exceeding standards and deadlines for assigned work.

Since accounting is a "practiced" art, this course involves a great deal of reading, preparation and practice. Completion of the reading and written assignments in a timely manner is essential to succeed in this course. Thus it is important to complete **EACH AND EVERY ONE** of the assignments. We will use the *eCollege* dropbox tool to manage the weekly assignments for this course. The requirements for completing and submitting weekly assignments (judicial briefs, article summaries, and chapter problems) are available on *eCollege*.

You are responsible for making whatever arrangements you must to ensure you



will be able to complete and submit all weekly assignments on time. ***Late assignments will NOT be accepted. Zero points will be awarded for weekly assignments that are not submitted to the correct eCollege dropbox by the due date and time.***

***Cases:*** The cases and case requirements will be available on *eCollege*. You are responsible for making whatever arrangements you must to ensure you will be able to complete the cases on time. Case solutions must be deposited in the correct *eCollege* dropbox by the due date and time. ***Ten percent (10%) of the total possible points will be deducted from the grade earned on the case FOR EACH CALENDAR DAY a case is late. Late cases will not be accepted after three days beyond the due date.***

***Research Paper:*** The research paper requirements, appropriate topics, and grading criteria will be available on *eCollege*. You are responsible for making whatever arrangements you must to ensure you will be able to complete the research paper on time. Research papers must be deposited in the correct *eCollege* drop box by the due date and time. ***Ten percent (10%) of the total possible points will be deducted from the grade earned on the research paper FOR EACH CALENDAR DAY a research paper is late. Late research papers will not be accepted after three days beyond the due date.***

Students agree by taking this course that all required papers may be subject to submission for textual similarity review to *SafeAssign* or similar software for the detection of plagiarism. All submitted papers will be included as source documents in the *SafeAssign* or other reference database solely for the purpose of detecting plagiarism of such papers.

***Threaded Discussions:*** Student participation in online discussions is very important for a distance learning class, as it allows the student to apply what he/she has learned of the course material. Posting to the discussion forum allows everyone to get the same information at the same time and contribute to the conversation. Submission and participation by every student is essential to the success of the discussion group. The requirements for submitting comments are available on *eCollege*. Topics for discussion will be posted on the *eCollege* discussion board each week. ***Contributions to class discussions are necessary for a student to excel in the achievement of the outcomes of this course.*** If you would like to discuss a current tax issue related to a topic being covered in class, I encourage you to send me the question/topic for consideration. There may be other students who are interested in the same tax issue/question.

**The eCollege Course Site: E-mail and Chat Room:** E-mail will be the method of communication in this class. You can e-mail me and other members of the class using the class *eCollege* mail. Email is the best way to reach me. I check my e-mail frequently on weekdays. Often I can answer questions quickly and easily via e-mail. Log on to the



*eCollege* course page to access mail or use my email address above to reach me outside of *eCollege*. Note that any posting to the class discussion forum will be distributed to all members of the class and to me. *Therefore, do not use the discussion forum for communications intended only for me or for a particular individual.*

There is also a chat room available for real-time discussion of topics. Students can meet in the chat room to study, or for real-time discussion of course topics. Log on to the *eCollege* course site to access the chat room.

***Blackboard Collaborate (formally Eliminate Live!) Sessions:*** Although it is not likely, it might be necessary to conduct a meeting using *Blackboard Collaborate*. In order to be prepared for such an occasion, you will need to complete the online "Participant Orientation," located at <http://www.blackboard.com/Platforms/Collaborate/Services/On-Demand-Learning-Center/Web-Conferencing.aspx>. The orientation takes approximately 5-10 minutes. If necessary, you will access a meeting held via *Blackboard Collaborate* through the course "Tools" > "*Blackboard Collaborate*" links. The TAX 6525 *Blackboard* course site is available to each student registered for the class. To access *Blackboard*, log on to <https://bb.fau.edu>, enter your FAU e-mail name and password, and select this course.



**Course Assessments:**

Grades are **earned** based on the following assessments:

Assessment	Points	%
Midterm Exam	237.5	23.75%
Final Exam	237.5	23.75%
Research Paper	200.0	20.00%
Cases	125.0	12.50%
Weekly Assignments	100.0	10.00%
Threaded Discussions	<u>100.0</u>	<u>10.00%</u>
Totals	<u>1,000.0</u>	<u>100.00%</u>

**Examinations:** Two exams will be given, a midterm exam and a final exam. The exam instruction will be available on the *eCollege* course site. The exams are open book, open notes, but you may not collaborate with others. The exams will include essay and problem solving questions and are designed to emphasize material covered each week. See the tentative schedule below and the *eCollege* course site exam dates and material covered. **There will be NO make-up exams.** You are expected to clear your schedules and make the arrangements necessary to complete and submit the exams in the correct *eCollege* drop box by the due date and time. **Ten percent (10%) of the total possible points will be deducted from the grade earned on the exam FOR EACH CALENDAR DAY the exam is late. Late exams will not be accepted after three days beyond the due date.**

**Additional Course Policies**

Missing Exams

Please note that there will be **NO** make-up exams. You are expected to clear your schedules and make the arrangements necessary to complete the exams by the due date and time. **Ten percent (10%) of the total possible points will be deducted from the grade earned on the exam FOR EACH CALENDAR DAY the exam is late. Late exams will not be accepted after three days beyond the due date.**

Late Assignments

When required, assignments must be submitted via the *eCollege* dropbox prior to the due date and time. Late weekly assignments will not be accepted. The due dates are posted on *eCollege*.



Attendance Policy

This course will be delivered entirely online.

Anti-plagiarism Software

Written components of any assignment or project may be submitted to anti-plagiarism software to evaluate the originality of the work. Any students found to be submitting work that is not their own will be deemed in violation of the University's honor code discussed above.

Course Outline

*Tentative Schedule:*

Week	Chapter: Topic	
1	Chapter 1: Overview of U.S. Taxation of International Transactions Chapter 2: Tax Jurisdiction	
2	Chapter 3: Source of Income Rules (Income)	
3	Chapter 3: Source of Income Rules (Deductions)	
4	Chapter 4: Foreign Tax Credit	
5	Chapter 4: Foreign Tax Credit – Deemed Paid Credit	
6	Chapter 4: Anti-Deferral Provisions	
7	Chapter 13: Tax Treaties Case 1 Due	
8	MIDTERM EXAM	
9	Chapter 12: Transfer Pricing	
10	Chapter 6: Foreign Currency Translation and Transactions	
11	Chapter 8: Planning for Foreign Operations Chapter 14: Sec. 367-Outbound, Inbound, and Foreign-to-Foreign Transfers	
12	Chapter 9: Foreign Persons Investing in the United States	
13	Chapter 10: Foreign Persons Doing Business in the United States Case 2 Due Research Paper Due	
14	Chapter 11: Planning for Foreign Owned United States Operations	
15	FINAL EXAM	

**Selected University and College Policies**

School of Accounting Policies

Students are responsible for School of Accounting policies available at <http://fau.edu/academic/registrar/FAUcatalog/business.php#accounting>.

***These policies are considered to be an integral part of this syllabus.***





#### Code of Academic Integrity Policy Statement

Students at Florida Atlantic University are expected to maintain the highest ethical standards. Academic dishonesty is considered a serious breach of these ethical standards, because it interferes with the university mission to provide a high quality education in which no student enjoys an unfair advantage over any other. Academic dishonesty is also destructive of the university community, which is grounded in a system of mutual trust and places high value on personal integrity and individual responsibility. Harsh penalties are associated with academic dishonesty. For more information, see [University Regulation 4.001](#).

#### Disability Policy Statement

In compliance with the Americans with Disabilities Act Amendments Act (ADAAA), students who require reasonable accommodations due to a disability to properly execute coursework must register with the Office for Students with Disabilities ([OSD](#))—in Boca Raton, SU 133 (561-297-3880); in Davie, LA 203 (954-236-1222); or in Jupiter, SR 117 (561-799-8585) —and follow all OSD procedures.

#### Religious Accommodation Policy Statement

In accordance with rules of the Florida Board of Education and Florida law, students have the right to reasonable accommodations from the University in order to observe religious practices and beliefs with regard to admissions, registration, class attendance and the scheduling of examinations and work assignments. For further information, please see [Academic Policies and Regulations](#).

#### University Approved Absence Policy Statement

In accordance with rules of the Florida Atlantic University, students have the right to reasonable accommodations to participate in University approved activities, including athletic or scholastics teams, musical and theatrical performances and debate activities. It is the student's responsibility to notify the course instructor at least one week prior to missing any course assignment.

#### College of Business Minimum Grade Policy Statement

The minimum grade for College of Business requirements is a "C". This includes all courses that are a part of the pre-business foundation, business core, and major program. In addition, courses that are used to satisfy the university's Writing Across the Curriculum and Gordon Rule math requirements also have a minimum grade requirement of a "C". Course syllabi give individualized information about grading as it pertains to the individual classes.

#### Incomplete Grade Policy Statement

A student who is passing a course, but has not completed all work due to exceptional circumstances, may, with consent of the instructor, temporarily receive a grade of incomplete ("I"). The assignment of the "I" grade is at the discretion of the instructor, but is allowed only if



the student is passing the course.

The specific time required to make up an incomplete grade is at the discretion of the instructor. However, the College of Business policy on the resolution of incomplete grades requires that all work required to satisfy an incomplete ("I") grade must be completed within a period of time not exceeding one calendar year from the assignment of the incomplete grade. After one calendar year, the incomplete grade automatically becomes a failing ("F") grade.

#### Withdrawals

Any student who decides to drop is responsible for completing the proper paper work required to withdraw from the course.

#### Grade Appeal Process

A student may request a review of the final course grade when s/he believes that one of the following conditions apply:

- There was a computational or recording error in the grading.
- Non-academic criteria were applied in the grading process.
- There was a gross violation of the instructor's own grading system.

The procedures for a grade appeal may be found in Chapter 4 of the University Regulations.

#### Disruptive Behavior Policy Statement

Disruptive behavior is defined in the FAU Student Code of Conduct as "... activities which interfere with the educational mission within classroom." Students who behave in the classroom such that the educational experiences of other students and/or the instructor's course objectives are disrupted are subject to disciplinary action. Such behavior impedes students' ability to learn or an instructor's ability to teach. Disruptive behavior may include, but is not limited to: non-approved use of electronic devices (including cellular telephones); cursing or shouting at others in such a way as to be disruptive; or, other violations of an instructor's expectations for classroom conduct.

#### Faculty Rights and Responsibilities

Florida Atlantic University respects the right of instructors to teach and students to learn. Maintenance of these rights requires classroom conditions which do not impede their exercise. To ensure these rights, faculty members have the prerogative:

- To establish and implement academic standards
- To establish and enforce reasonable behavior standards in each class
- To refer disciplinary action to those students whose behavior may be judged to be disruptive under the Student Code of Conduct.

### **Computer Requirements**



It is a student's responsibility to meet the minimum computer requirements for FAU online courses. All students are required to use Windows-based PCs, Macintosh/Apple computers are not compatible with some programs that may be used. You should also set your browser to allow it to run activeX controls to use web-based applications. Due to the online nature of the course, DSL or modem connection is strongly desired, but not required.

Support for FAU Computing is available through the IRM help desk, at (561) 297-3999. If you experience technical problems with the eCollege website, contact the [helpdesk@faumba.net](mailto:helpdesk@faumba.net). Do not contact your instructor. Contact your ISP (Internet Service Provider) for problems with your internet connection, or your computer retailer or software vendor for various other problems.

#### Disclaimer

This syllabus and tentative schedule for course work is merely a guide to assist the student in planning, and is subject to change at any time upon reasonable notice. ***The course assignments are also tentative and may change at any time upon reasonable notice. Timely posting of changes to eCollege is considered to be reasonable notice. Students should check the online postings to eCollege daily.***