

Tax Research Seminar

Credit Hours. 2

Course Description.

This is a research seminar focusing on business tax policy, broadly defined. The course consists of two parts. Part 1, which comprises three meetings in January and February of 2024, provides an overview of business tax policy debates. Part 2 comprises three class meetings in April 2024 and a research paper. The class meetings in Part 2 consist of students' presentations of their research projects.

Course Objectives/Learning Outcomes.

Students successfully completing the course will:

- Acquire a basic understanding of significant tax policy issues in business taxation, including:
 - Economic analysis of taxation;
 - Income and consumption taxation; and
 - Corporate tax.

Required Readings.

Chapters 3 and 6 of Leonard E. Burman & Joel Slemrod, Taxes in America: What Everyone Needs to Know (2nd ed. 2020). The book is available on reserve and for purchase online at https://www.amazon.com/Taxes-America-What-Everyone-Needs-dp-0190920866/dp/0190920866/ref=dp_ob_title_bk.

Other readings consist of provisions of the Internal Revenue Code, excerpts from scholarly articles, and other materials as indicated on the course schedule below. Most of the readings are readily available online. I will circulate materials that are more difficult to locate. Please read the materials in the order in which they are listed on the schedule.

Optional Texts. Students may find review of background material helpful, including any of the following:

Bittker et al., Federal Income Taxation of Corporations and Shareholders (updated periodically).

Burke, Federal Income Taxation of Corporations and Stockholders in a Nutshell (8th ed. 2018).

Attendance and Paper.

Attendance. You are expected to attend class and participate in class discussions. For Part 1 of the course, I will circulate questions before class that you should be prepared to answer if called on. You are on call every class, unless you notify me before class by email that you would like to pass. Each student may take one pass at no penalty during the semester without offering any reason. If you believe that you need to pass more frequently, please contact me outside of class or email me. Students who are excused from being on call are effectively present as visitors and may not participate in the discussion.

Paper. You must submit a brief (not more than one paragraph) description of your topic by Feb. 1. Once your topic is approved, I strongly encourage (but do not require) you to provide me with an outline, a rough draft or both no later than March 31. Feedback that I provide on outlines and rough drafts is not graded.

Your final paper is due on Thursday, May 9, at 5:00 p.m.

Statement on Workload: Students should expect to spend, on average, at least two full hours preparing for every 55- minute hour of class, and often more. This estimate does not include time spent researching and writing the paper for the course.

Grading.

Grades will be awarded in accordance with the College of Law's posted grading policy (available at <https://www.law.ufl.edu/life-at-uf-law/office-of-student-affairs/current-students/academic-policies>). Grades are based on class participation in Part 1 (20%), your presentation in Part 2 (20%) and your final paper (60%).

Letter grades correspond to grade points as follows:

Letter Grade	Point Equivalent
A (Excellent)	4.0
A-	3.67
B+	3.33
B (Good)	3.0
B-	2.67
C+	2.33
C (Satisfactory)	2.0
C-	1.67
D+	1.33
D (Poor)	1.0
D-	0.67
E (Failure)	0.0

Note that the mandatory Law School mean does not apply to LLM students.

Office Hours.

Mondays, 1:05 to 2:45, and by appointment. I strongly encourage you to see me if you have questions about the material. I am also happy to discuss any aspect of tax law or tax practice with you.

Course Policies.

1. Accommodations. Students requesting accommodation for disabilities must first register with the Dean of Students Office (<http://www.dso.ufl.edu/drc/>). The Dean of Students Office will provide documentation to the student, who must then provide this documentation to Student Affairs (Dean Rachel Inman) when requesting accommodation. You must submit this documentation prior to submitting assignments or taking the quizzes or exams. Accommodations are not retroactive. Therefore, students should contact the office as soon as possible in the term for which they are seeking accommodations.
2. University Policy on Academic Misconduct. Academic honesty and integrity are fundamental values of the University community. Students should be sure that they understand and comply with the UF Student Honor Code, available at: <https://www.dso.ufl.edu/%20sccr/process/student-conduct-honor-code>. Failure to comply can result in sanctions, as described in the UF Student Honor Code.
3. Netiquette: Common Courtesy. All members of the class are expected to follow rules of common courtesy in all email messages, threaded discussions and chats. They also are advised to adhere to the guidelines and rules set forth in the University's policy, available at <http://teach.ufl.edu/wp-content/uploads/2012/08/NetiquetteGuideforOnlineCourses.pdf>. Students who consistently or intentionally fail to follow these rules may be subject to discipline, including but not limited to grade reduction and referral to the Law School or University for further disciplinary action.
4. Recordings of Class. All classes will be recorded via Mediasite in case students must miss class for health reasons. The Office of Student Affairs will work with faculty to determine when students may have access to these recordings, and the recordings will be password protected. It is the student's responsibility to contact the Office of Student Affairs as soon as possible after an absence.
5. Online Course Evaluation. Students are expected to provide feedback on the quality of instruction in this course by completing online evaluations at <https://evaluations.ufl.edu>. Evaluations are typically open during the last two or three weeks of the semester, but students will be given specific times when they are open. Summary results of these assessments are available to students at <https://evaluations.ufl.edu/results/>.
6. UF Law respects students' observance of religious holidays. Students, upon prior notification to their instructors, shall be excused from class or other scheduled academic activity to observe a religious holy day of their faith.

7. Students shall be permitted a reasonable amount of time to make up the material or activities covered in their absence.
8. Students shall not be penalized due to absence from class or other scheduled academic activity because of religious observances.

SCHEDULE

Jan. 22 (first day of class)	Basic principles of public finance	1. Len Burman & Joel Slemrod, <u>Taxes in America: What Everyone Needs to Know</u> , Chapters 3, 6.
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