

ACCT 7415
Tax Policy and Research
Fall 2024

IMPORTANT: The course syllabus is a general plan for the course; deviations announced to the class by the instructor may be necessary.

Both the Terry College and I are committed to promoting diversity, equity, inclusion, and belonging among its students, faculty, and staff. This class welcomes the open exchange of ideas and values freedom of thought and expression. This class provides a professional environment that recognizes the inherent worth of every person. It aims to foster dignity, understanding, and mutual respect among all individuals in the class.

Instructor: Jennifer L. Chapman, JD, CPA

Office: A302 Moore-Rooker Hall

Cell: (706)654-7484*

Email: jennchap@uga.edu *

*A text message, email, or call to my cell are the best ways to reach me. Please note any communication received after 9 pm will generally be returned the following day.

Classroom: 218 Correll Hall

Meeting Time & Days: MW 9:35-10:50 (CRN 13366) or MW 11:10-12:25 (CRN 27686)

Dr. Chapman's Office Hours:

Drop-in Office Hours: Tuesdays from 8:00 am to 11:00 am. (NOTE: Depending on my schedule, I will announce additional office hours I am able to offer in advance of major assignments, if any.)

LOCATION: My office (A302 Moore-Rooker)

NOTE: If you are not available during any of these times *due to class conflicts or for medical reasons*, please text or email me in advance. Then, we can try to arrange either a Zoom or in-person meeting at another mutually convenient time. As a reminder, not having class until 11 am or later on Tuesdays does NOT mean you are unavailable from 8 to 11 am.

Grader Office Hours: Aaron Eigenbauer, a fellow MAcc student who has taken this course, will be assisting me this semester and will hold peer-to-peer office hours on Thursdays from 2:30 to 4:00 pm beginning a couple of weeks into the course. Please check eLC for additional details.

Course Description:

Development of tax research tools and the development of an understanding of tax policy issues as they arise in social policy and professional accounting settings.

Effective analysis, communication, and planning are stressed. Selected Code sections and topics are used for illustration.

Course Outcomes:

This course provides an introduction to the fundamentals of tax research. Upon completion of this course, students will be able to:

- (1) Demonstrate a basic understanding of tax law authorities and tax practice and procedure,
- (2) Demonstrate the ability to research basic income tax problems using appropriate tax authorities and research services, and

- (3) Communicate tax research results orally and in writing at a level appropriate to an entry-level tax associate.

Required Prerequisites:

ACCT 5400/7400 and permission of the department

Required Texts:

- Internal Revenue Code, Current Edition (Both Volumes, Unabridged, No older than summer 2023 Edition)

Recommended Texts:

- Federal Tax Research, 11th Edition (Cengage 2017). ISBN-10: 1337282987 (Hardbound) or ISBN-10: 1337485942 (eBook) (NOTE: 10th edition is OK if you cannot find the 11th edition.)
- Texas Law Review Manual on Usage & Style (14th or 15th edition), ISBN: 1-878674-58-7 or 1-878674-59-5. The 15th edition is available at <https://law.utexas.edu/publications/books/manual-on-usage-and-style-mous/> for \$17.00 (It's usually more expensive on Amazon.)

Academic Accommodations:

If you have a letter from Disability Services indicating you have a documented disability that requires academic accommodations, please present the letter to me in person by the end of the second week of the semester so we can discuss the accommodations you might need for the class.

Mental Health and Wellness Resources:

- If you or someone you know needs assistance, you are encouraged to contact Student Care and Outreach in the Division of Student Affairs at 706-542-7774 or visit <https://sco.uga.edu>. They will help you navigate any difficult circumstances you may be facing by connecting you with the appropriate resources or services.
- UGA has several resources for a student seeking mental health services (<https://www.uhs.uga.edu/bewelluga/bewelluga>) or crisis support (<https://www.uhs.uga.edu/info/emergencies>).
- If you need help managing stress anxiety, relationships, etc., please visit BeWellUGA (<https://www.uhs.uga.edu/bewelluga/bewelluga>) for a list of FREE workshops, classes, mentoring, and health coaching led by licensed clinicians and health educators in the University Health Center.
- Additional resources can be accessed through the UGA App.

Organization:

The course will follow the organization in the attached schedule. The first few weeks of class will include an intense introduction to tax research methodologies and tools. Subsequent class meetings will be used to explore these tools in a more in-depth manner, including professional ethics and IRS practice & procedure, refine research skills, and develop communication skills. Required readings and homework assignments will be communicated via eLC in advance of class.

Academic Honesty:

As a University of Georgia student, you have agreed to abide by the University's academic honesty policy, "A Culture of Honesty," and the Student Honor Code: *"I will be academically honest in all of my academic work and will not tolerate academic dishonesty of others."* A Culture of Honesty, the University's policy and procedures for handling cases of suspected dishonesty, can be found at www.uga.edu/ovpi.

Lack of knowledge of the academic honesty policy is not a reasonable explanation for a violation. Questions related to course assignments and the academic honesty policy should be directed to the instructor. All

academic work submitted in this course must be your own unless you have received my permission to collaborate and have properly acknowledged receiving assistance. It is my responsibility to uphold the University's academic honesty policy and report my belief of dishonesty to the Office of the Vice President for Instruction. The *minimum* penalty for academic dishonesty is an "F" in this course.

NOTE ON ARTIFICIAL INTELLIGENCE AND THE ACADEMIC HONESTY POLICY:

I will let you know in advance if the use of AI is permitted on a given assignment. Unauthorized use of artificial intelligence software or word mixing software to write papers or other assignments or to disguise plagiarized work as your own is considered unauthorized assistance in this course and will be considered a violation of the University's academic honesty policy.

Grading:

Cases - Total	50 %
IRC	2%
CCH	4%
RIA	4%
Group 1	7.5%
Individual 1	7.5%
Group 2	12.5%
Individual 2	12.5%
Exams (equally weighted)	42 %
In-Class/Homework Activities	8 %
TOTAL	100%

Cases - Purpose:

Research cases serve several purposes. First, research cases require the location and analysis of tax authorities and encourage the development of efficient and effective tax research skills. Second, research cases serve as a means for improving communication skills including organization, writing style, and presentation. The discussion and deliberation of solutions provide a mechanism for expanding and refining tax problem-solving skills.

In practice, research solutions (called write-ups or research memos) are produced primarily for two reasons. First, research memos identify problems and communicate proposed solutions with a specific organization. Second, memos provide work products, which document the effort and competency of the professional. Both the content and the style of the memos are reviewed by supervisors who (usually) reward creative solutions, which are communicated efficiently and effectively. Grammar, punctuation, and appropriate format and tone are crucial in a professional accounting environment. **Please see the above NOTE on the unauthorized use of AI and the academic honesty policy.**

Cases - Evaluation:

Solutions to tax research cases are rarely definitive. Instead, many different approaches to a single case can be justified depending upon the authorities and the reasoning used in the solution. Each solution, however, should contain three elements. A solution should first identify the relevant tax issues. Next, solutions should identify the most relevant tax authorities that apply to the problem. Finally, each solution should provide the reasoning for applying authorities to solve the issues and reach a clear conclusion. These three elements provide the basis for evaluating the content of research case solutions. *Research cases are also evaluated on style, grammar, spelling, and punctuation.*

Solutions are generally transmitted through a file memorandum or other form of internal communication. Sometimes a form of external communication, such as a client letter or IRS protest, is used in conjunction with

an internal communication. Each of these forms may be modified to provide a clear, concise, and precise presentation of the research content. Presentation is evaluated primarily by whether the contents of the solution are presented in a manner that facilitates effective and efficient communication. The format and structure of the solution must be coherent and well-organized, authorities must be correctly and clearly analyzed, and the communication should not suffer from technical problems (errors in grammar, punctuation, or citations).

Cases - Format:

The first page should be a professionally formatted cover page. The cover page must include your name, the due date, and the name of the case (e.g., Individual Case 1) as well as a signed or initialed honor code statement: “This is my own work.” (You may type in your signature or initials or handwrite it, as you prefer. By doing so, you are indicating that you have not violated the UGA Academic Honesty Policy in the completion of your case assignment and have not witnessed any violation of that policy.)

Unless the instructions provide otherwise for a given assignment, all case solutions (i.e., research memos) should be prepared in accordance with the following format.

1. Facts - Briefly condense the case facts in your own words. Do not merely copy & paste the facts from the case assignment.
2. Issue(s) - Briefly discuss the specific federal income tax issues involved in the case. Don’t necessarily limit yourself to the questions explicitly stated in the case, if any; those are there to get you started but should not be considered all-inclusive. We will not address other taxes in memos in this course, only the federal income tax.
3. Authorities – list correctly formatted citations for all relevant authorities in hierarchical order - e.g., IRC Sections & regulations, court cases, etc.
4. Conclusion(s) - Very succinctly state your conclusion for each issue.
5. Analysis(es) - Summarize your analysis by issue and reasoning for your conclusion.

NOTE: I provide you with a variety of research & writing resources both in class and through eLC links. USE THEM! I promise they are there to help you become the best writer you can be.

Cases - Due Dates, etc.:

All individual and group cases (1 copy per group) are due promptly at the beginning of your class period on the assigned due date. BE ON TIME!! PRINT IN ADVANCE!! There are **no allowances** made for late work except in extreme circumstances (severe illness, death in the family, etc.).

For individual cases, each student is responsible for the research on the case assigned as well as the completion of the research memo. Stated another way, each individual case is not a team project. It is an individual project, and I am looking for the product of your work. Accordingly, as a reminder, include the statement, “This is my own work,” on the cover page of each individual case solution and sign it. **Group discussion or work on these cases is considered a violation of the academic dishonesty policy and will be treated in accordance with University guidelines.**

For the group cases, each group is responsible for the research on the case assigned as well as the completion of the research memo. Stated another way, each group case is not a class project. It is a group project, and I am looking for the product of your group’s and only your group’s work. Accordingly, include the statement, “This is our own work,” on the cover page of each case solution and sign it. **Cross-group discussion or work on these cases is considered a violation of the academic dishonesty policy and will be treated in accordance with University guidelines.**

Cases - Oral Presentation:

You should be prepared to present part or all of each case – both individual and group assignments -- as part of our class discussions. I may cold call on you during class at any time, so be prepared to answer questions and support your analysis and conclusion.

Exams:

There are three, equally weighted exams. The first midterm exam will be given IN CLASS on the date indicated in the attached schedule. The exam will consist of a series of research questions that require ONLY the use of your hard copy of the Internal Revenue Code. NO other resources, including any online resources, will be allowed for purposes of the first midterm exam.

The second midterm will be given at the assigned date and time (evening) indicated on the attached schedule. The exam will be a closed-book and closed-note exam that tests your understanding of research tools and authorities based on the outside readings and lectures from this course. You should take good notes in class on days I lecture or we discuss readings in order to succeed on this exam. You should also take good notes on the guest speaker's presentations, as you will be asked about the materials they cover as well. Merely reviewing the PowerPoint slides is not sufficient to succeed on this exam.

The last midterm exam will be conducted at the assigned date and time indicated on the attached schedule. This exam will consist of a series of short research questions, which you will answer using CCH and/or RIA internet tax resources. This exam may move online as a timed individual research assignment if needed. Regardless of format, you will NOT have to write a memo on this exam.

NOTE: There are no allowances for missed exams (i.e., no make-up exams) except in extreme circumstances (severe illness, death in the family, etc.).

In-Class/Homework Activities:

Performance corresponds with preparation, and therefore, it is imperative to keep up with the assignment schedule. The grade assigned to participation is designed to provide an incentive to keep current with class discussions. Participation is evaluated through case discussions and class discussions – either face-to-face or online. The evaluation of discussions is based upon comprehension and preparation as demonstrated by the presentation and deliberation of innovative solutions, responses to questions, and inquiries posed during class. In accordance, each student is expected to attend all classes either in-person or synchronously online (NOTE: Please notify me ASAP if you have IT issues so that I can get you an asynchronous version of that day's class to review.) and positively contribute to case and class discussions.

Non-case, in-class or homework assignments, possibly including unannounced quizzes, will be given from time-to-time during the semester, both in class and as homework. These assignments are designed to facilitate preparation and encourage discussion

In-Class/Homework Activities grades will be based on effort, completeness, and accuracy.

No late assignments will be accepted for any reason.

Fall 2024 - Course Schedule
(SUBJECT TO CHANGE, CHECK eLC DAILY FOR ANY CHANGES OR UPDATES)

Date	Topic	Distributed	Due
8/14	Introduction; Definition of Tax Research <i>READ: Tax Research Methodology Article</i>		
8/19	Tax Research Methods <i>RE-READ: Tax Research Methodology Article</i>		
8/21	Tax Research Methods cont'd & Issue Spotting Exercises <i>RE-READ: Writing Tax Research Memos Article</i>	<i>At Home Group Ex.</i>	
8/26	Written & Oral Communication <i>BRING: Writing Tax Research Memos Article</i> <i>RE-READ: Writing Tax Research Memos Article</i>	<i>IRC Mini Cases</i>	At Home Ex.
8/28	Using the IRC & Substantial Authority <i>BRING: Your Code</i> <i>READ: IRC and Regulations Overview Article, and Federal Tax Law Hierarchy Article</i>		
9/2	Labor Day – NO CLASS		
9/4	Review of IRC Mini Cases Introduction to Citation Formats Beyond the Code and Intro to Internet Research <i>BRING: Your laptop and your Code.</i>		IRC Mini Cases
9/9	RIA Instruction <i>BRING: Your laptop – you should log in to RIA and follow along with the exercises</i>	<i>RIA Mini Cases</i>	
9/11	Judicial Authorities <i>READ: Understanding the Federal Courts Article</i>		
9/16	Administrative Authorities & Other Sources <i>RE-READ: Federal Tax Law Hierarchy Article</i> <i>BRING: Your Code, laptop, & <u>a printed draft of your RIA Mini Cases memo</u></i>		
9/18	Discussion of RIA Mini Cases <i>BRING: Your Code & laptop</i>		RIA Mini Cases

Date	Topic	Distributed	Due
9/23	CCH Instruction <i>BRING: Your laptop – you should log in to CCH and follow along with the exercises.</i>	<i>CCH Mini Cases</i>	
9/25	Citators <i>BRING: Your laptop & <u>a printed solid first draft of your CCH Mini Cases</u></i>		
9/30	Discussion of CCH Mini Cases <i>BRING: Your Code & laptop</i>	<i>Group Case 1</i>	CCH Mini Cases
10/2	Review of Tax Research Process, Hierarchy, etc. & Importance of Good Communication <i>REVIEW: Writing Tax Research Memos Article; IRC and Regulations Overview Article, Federal Tax Law Hierarchy Article</i>		
10/7	Review of Citation Formats & Writing Memos <i>BRING: Your laptop & <u>a printed solid DRAFT of Group Case 1</u></i>		
10/9	Discussion of Group Case 1	<i>Indiv. Case 1</i>	Group Case 1
10/14	Taxpayer Penalties <i>READ: Secs. 6662, 6663, 6664</i> <i>SKIM: IRC Secs. 6651, 6652, 6702, 6652, 6698</i>		
10/16	Midterm Exam I: Code-based research – You can only use your Code! In class. BRING: Your IRC – both volumes.		
10/21	Preparer Penalties <i>BRING: Your Code</i> <i>READ: Secs. 6662, 6694, 6700, 6701 and Circular 230</i>		
10/23	Discussion of Indiv. Case 1	<i>Group Case 2</i>	Indiv. Case 1
10/28	Ethics/Professional Responsibilities Guest Speaker – Deloitte <i>READ: Speaker's Slides</i> <i>SKIM: Circular 230 & AICPA Code of Professional Conduct & Statements on Standards for Tax Services</i>		
10/30	Current Issues: Tax Policy Discussion #1 ESG AND TAX <i>READ: Assigned Article(s) – See eLC for details</i>		
11/4	Discussion of Group Case 2	<i>Indiv. Case 2</i>	Group Case 2
11/6	National Tax Policy / IRS Administration Guest Speaker – PwC <i>READ: Speaker's Slides</i> <i>SKIM: IRS Publications 5, 556, & 594</i>		

Date	Topic	<i>Distributed</i>	Due
11/11	Current Issues: AI, Data Analytics, and Tax Policy & Research <i>READ: Assigned Article(s) – See eLC for details</i>		
11/13	Catch-up Day/Exam Review		
11/18	Midterm Exam II & End of Semester Celebration – EVENING Time TBD (Approx. 6 to 8 pm) Covers Notes from Class and Guest Speakers – Closed Book		
11/20	Discussion of Indiv. Case 2		Indiv. Case 2
11/25	Midterm Exam III – POSSIBLY EVENING Time TBD (Approx. 6 to 8 pm)/POSSIBLY ONLINE Timed Research Exam: You Will Need Your CCH and RIA Log In Information and Your Laptop		
11/27 to 11/29	– Thanksgiving Break		
12/2	NO CLASS!		