

TAXATION (TX)

TX 590 Internship in Tax Practice (1 credit)

A one-credit field-based educational experience for Bentley students, with the opportunity to (1) observe professional practices in taxation, (2) apply hands-on taxation knowledge learned in classes, (3) develop professional skills, (4) test aptitude and personal preferences for various career directions, and (5) establish a basis for future professional employment. This internship option is available to Bentley graduate students. Students must work a minimum of 15 hours per week for a minimum of 10 weeks at an organization and position suitable for the individual student's field learning experience and complete specific requirements during their internship. A student is limited to doing one such one-credit internship before degree completion.

Typically Offered: As needed

TX 600 Professional Tax Practice (3 credits)

Covers the development and implementation of tax strategies. Encompasses the application of alternative tax laws to a variety of fact situations. Applies an integrated approach to develop solutions that consider the numerous aspects of wealth maximization. Emphasizing the use of case studies, the course introduces theories and methods of tax research and analysis that include research tools, techniques, and quantitative methods. Students use the college's specialized information technology resources, such as the Accounting Center for Electronic Learning and Business Measurement and the Trading Room as well as public domain and proprietary tax databases. Examines the role and regulation of the tax practitioner and representation of taxpayers before the IRS. Other topics include ethical responsibilities, IRS examination of returns, statutes of limitations, and tax practice strategies and techniques. Promotes teamwork, and emphasizes written and oral presentations.

Typically Offered: Once a year

TX 601 Federal Taxation of Income (3 credits)

Not open to students who have taken or are required to take AC 750

This course studies federal tax law as it applies to individuals. It emphasizes the determination of gross income, deductions and credits, as well as identity of the taxable person, tax accounting and timing principles. The course introduces the tax treatment of individuals as owners of pass-through entities. It involves an in-depth analysis of the applicable tax statutes, regulations, rulings and leading court cases. Students gain an awareness of the history and tax policy considerations behind various Internal Revenue Code provisions.

Typically Offered: Once a year

TX 602 Transactions (3 credits)

This course deals with property transactions (tangible and intangible) and the ultimate tax consequences. It analyzes transactions to explore the significance of realization and recognition concepts and the characterization of gains and losses. It covers dispositions of property used in a trade or business, and held for personal use or investment, as well as deferred payment transactions. It introduces structuring the reorganization or sale of entire business units in mergers and acquisitions. It examines Internal Revenue Code provisions and selected issues that relate to determining basis, holding period, loss (active and passive) and attribute carryovers. The course also reviews transactions with the goal of conducting a thorough analysis, exploration of alternatives, and ultimate structuring to assure the desired result.

Typically Offered: Once a year

TX 603 Corporations and Shareholders (3 credits)

This course focuses on tax treatment of events in the life of a corporation, with special emphasis on problems at both the corporate and shareholder levels. Topics include the taxability of associations, partnerships and trusts as corporations; tax considerations in the organization and reorganization of the corporation; dividend distributions; stock redemptions; and complete and partial liquidations.

Typically Offered: Once a year

TX 604 Multi-Jurisdictional Taxation (3 credits)

This course addresses the increased importance of international, multistate and e-business taxation in today's global environment. It introduces students to the principles guiding nexus, geographic allocation of income, and avoidance of double taxation. The course develops an understanding of the U.S. tax rules that may apply to income involving the U.S. and another country, and compares these with the multistate tax rules. It deals with the tax implications of business conducted electronically. Students use specialized information technology resources and public domain databases to conduct relevant research. The course applies multi-jurisdictional tax principles and rules to real-world case studies.

Typically Offered: Once a year

TX 700 Directed Study in Taxation (3 credits)

A Directed Study is designed for highly qualified students who, under the direction of a member of the sponsoring academic department, engage in an agreed-upon in-depth independent examination, investigation or analysis of a specialized topic.

Typically Offered: As needed

TX 704 Federal Taxation of Income from Trusts and Estates (3 credits)

This course analyzes taxation of trusts and estates, and their creators and beneficiaries. It examines taxation of simple and complex trusts for example, grantor trusts, irrevocable trusts and revocable trusts. Topics include trusts distinguished from corporations, distributable net income, fiduciary accounting income, the tier system, capital gains in estates and trusts, termination of estates and trusts, and administrative powers. The course considers charitable remainder trusts, pooled income funds and charitable beneficiaries, as well as planning for estate administration. Students also study income in respect of a decedent (IRD), including structural relationships, basis of IRD, relationship of IRD to distribution rules, character of IRD, and deductions.

Typically Offered: Every two or more years

TX 707 Pass-Through Entities and Closely Held Businesses (3 credits)

This course provides an in-depth study of pass-through entities and problems peculiar to closely held businesses. It emphasizes students' understanding of the tax statutes, court cases and practice techniques related to the concept of "choice of entity," and creates an awareness of the potential consequences of choosing a particular form of entity. The course focuses on the practical (and tax practice) aspects of working with and advising clients on such decisions.

Typically Offered: Once a year

TX 711 Mergers and Acquisitions (3 credits)

This course focuses on the formation, acquisition, merger, reorganization, recapitalization and divestiture transactions of business entities. It addresses the topic of planning for transactions, with a view toward identifying the approaches that are most efficient and tax-free. The course examines Internal Revenue Code and judicial requirements that must be satisfied for successful execution of these transactions. It also reviews transaction elements (taxable and non-taxable), acceptable consideration, basis, entity attributes and carryovers.

Typically Offered: Once a year

TX 731 Investment Companies and Other Financial Products (3 credits)

This course explores the tax treatment of investment companies and financial products. It introduces the major types of investment and their classification for tax purposes. The course focuses on mutual funds, exchange-traded funds, unit investment trusts, separately managed accounts, and offshore funds. It analyzes the applicable special tax provisions in light of the economic function and operation of these entities. The course also examines the taxation of financial products such as mutual fund shares.

Typically Offered: Every two or more years

TX 732 Intellectual Properties (3 credits)

Devotes attention to the tax treatment of the development, purchase, sale and licensing of intellectual properties. Specific areas of interest include computer software, research and development, the research credit, valuation of intellectual properties, amortization of intangibles, licensing, multi-jurisdictional issues, and related-party transactions. Includes an introduction to computer software, patents, trade secrets, know-how, trademarks, trade names and copyrights.

Typically Offered: Every two or more years

TX 733 Tax Aspects of Buying and Selling a Business (3 credits)

This course provides a comprehensive review of the tax issues that arise in merger and acquisition transactions. It will explore all the popular mechanisms for transferring a business from a taxable sale of assets or corporate stock, to tax-free reorganizations, to contingent "earn out" transactions, to transactions involving an employee stock ownership plan ("ESOP"). The course examines and prepares the optimal strategies for selling a C or S corporation, an LLC (partnership), and a sole proprietorship. It examines tax strategies such as purchase price allocations under Code 1060; elections under Code 338(g) and 338(h) (10); the complicated planning strategies for an S corporation subject to the Code 1374 "Sting Tax"; the opportunities and risks of a contingent earn-out structure; the circumstances for a tax-free merger; structuring an investment by and/or sale to private equity investors; and creating a market for a company by selling shares through an ESOP.

Typically Offered: Every two or more years

TX 741 Tax Accounting Problems (3 credits)

This course considers the intricacies of the tax accounting rules and their contrast to financial accounting. It covers a range of topics that include the cash and accrual methods of accounting and the tax consequences of changing from one method to another, inventory identification and valuation, and tax depreciation with a focus on tax accounting and the major differences from financial accounting. The course deals with forgiveness of debt, passive loss rules, interest expense and the alternative minimum tax.

Typically Offered: Once a year

TX 755 Special Topics Seminar in Taxation (3 credits)

Pre-Req: Varies by topic

This course offers an in-depth exploration of taxation issues and topics developed based on student and faculty interests. It provides an opportunity for students who have specific projects in mind. Students conduct research and write original papers of publishable quality, and make an oral presentation of the research findings to fellow seminar participants at the end of the semester.

Typically Offered: Every two or more years

TX 761 State and Local Tax Practice (3 credits)

This course addresses the sources of state and local revenues derived from taxation, including multi-jurisdictional business excise taxes, personal income tax, consumer and transaction taxes, property taxes, and death taxes. It builds on the knowledge base developed in TX 604. Students examine constitutional restrictions on the jurisdiction to tax; allocation and apportionment of multistate income; state taxation of e-commerce; domicile concepts; and detailed review of administrative provisions related to the audit, assessment, collection and appeal of state and local taxes.

Typically Offered: Once a year

TX 771 International Tax Practice (3 credits)

This course explores international taxation with comprehensive coverage of inbound and outbound U.S. tax issues. It expands the knowledge base developed in TX 604. The course considers the federal government's jurisdiction to tax on the basis of both residence and source of income. Topics covered include taxation of U.S. citizens abroad, individuals and corporations with resident and nonresident alien status, the concept of income effectively connected with U.S. trade or business, taxation of domestic entities doing business abroad, controlled foreign corporations, foreign tax credits, intercompany pricing, and allocation and apportionment of domestic expense. The course includes discussion of export incentives such as the Extraterritorial Income Exclusion (successor to Foreign Sales Corporations).

Typically Offered: Once a year

TX 781 Internship in Tax Practice (3 credits)

This course enables students to enhance their development and direction by integrating prior classroom study with the real-world experience of professional employment. Each student is required to prepare a research paper addressing a contemporary tax issue and a paper assessing the work experience, under the supervision of a faculty advisor.

Typically Offered: Fall and Spring

TX 799 Tax Special Topics (3 credits)

Pre-Req: Varies by topic

Selected Topics, and Special Topics, are intended to address timely or transient themes or new content areas not intended for permanent course status. Any particular topic may be offered only twice.

Typically Offered: Every two or more years