Course Description/Overview

Advanced research in federal taxation. Includes historical and current developments, sources of tax law, research methodology, case studies and reports.

Prerequisite Knowledge
ACCT 3361 (Income Tax Accounting) and either ACCT 4362 or ACCT 6361 (Advanced Tax Accounting)

Course Technology
- Internet access is necessary.
- Course materials may be found on the University’s Blackboard system at http://blackboard.angelo.edu.

Class Meeting Times
Monday and Wednesday 12:30 pm – 1:45 pm*
* Materials and lectures are available on Connect and Blackboard
Rassman Building (RAS) 111

Technical Support
The Technology Service Center (TSC) may be contacted by calling (325) 942-2911 or 1-866-942-2911 or by email at helpdesk@angelo.edu

Faculty/Instructor Information

Renee Foshee, JD, LLM, CPA
Asst. Professor of Accounting
Office: Rassman Building Room 256
Phone: 325-486-6407
E-Mail: renee.foshee@angelo.edu
Office Hours: By appointment (e-mail to schedule). Appointments may be online.
Course Objectives

Learning Objectives:
At the completion of this course a student should be able to:

- Use multiple research sources to research tax problems
- Make effective use of current and reliable sources of tax law to address various situations.
- Identify relevant sources of tax law to address various situations.
- Demonstrate skills in the appropriate use of research technology to research tax problems.
- Identify critical tax issues for a variety of situations and tax entities.
- Apply original ideas to resolving identified critical tax issues.
- Clearly communicate the results of your research and analysis in both written and oral formats.
- Understand basic tax practice and procedure.

Assessment Methods
Students will demonstrate competence in the objectives listed above through a combination of exams and written assignments.

Course Textbook and Required Readings

No textbook is required for this course.

Readings will be assigned in a timely manner as needed and will be provided to you as PDF, in MS Word format, or as a link to an online resource.
## Grading Policies

This course employs the following to measure student learning.

<table>
<thead>
<tr>
<th>Grade Calculations</th>
<th>Percent of Grade</th>
</tr>
</thead>
<tbody>
<tr>
<td>Homework, Quizzes, and Cases</td>
<td>60%</td>
</tr>
<tr>
<td>Mid-Term Examination</td>
<td>20%</td>
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<tr>
<td>Final Research Project</td>
<td>20%</td>
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</tbody>
</table>

Angelo State University employs a letter grade system. Grades in this course are determined on a percentage scale:

- A = 90 – 100%
- B = 80 – 89%
- C = 70 – 79%
- F = 59 % and below.

Per ASU policy, grades of D are not given in graduate courses

**Homework, Quizzes, and Cases:** As we move through the material I will place assignments in Blackboard. These assignments may consist of advanced readings and problems and homework problems relating to the material we cover in class. The deadlines for these assignments will always be at 11:59PM on the day they are due. At that time (11:59PM) the system will close and you will be graded on the work completed prior to that time. I will make every effort to remind you of due dates in class, but ultimately you are responsible for meeting the deadlines that are listed on Blackboard for this course.

Written work products will be prepared during the semester. It is anticipated that students will prepare a client letter, protest letter, memo to file, research memorandum, and short answer assignments. Unless the specific assignment instructions differ, assignments should be typed, double space.

Written assignments will be graded as follows:

- 30% law
- 30% analysis
20% citation
10% format
8% attention to detail
2% outline
100%

The portion of homework and quiz points will be determined by a percentage of the total number of points earned divided by the total possible points. For example, if there are a possible 2,500 points available for homework and quizzes and you get 2,173; then 2,173 ÷ 2,500 = 0.8692. Therefore, you would get 86.92% of the 25% available for homework and quizzes.

Examinations: There will be one semester exam covering material covered in lectures, readings, and projects to that point.

Final Research Project: One in-depth final research project will be assigned. Students will be required to conduct research and communicate the analysis in a memo format. The project will be due on Monday, May 10, by midnight.

Missed/Late Work:

Assignments are an opportunity to practice and demonstrate the use of tax rules. To encourage participation in assignments, homework and quizzes have been allocated 60% of the class grade.

You are highly encouraged to complete assignments on or before the assigned date because it is related to classwork. Completed assignments and quizzes are due on the assignment date in the assignment software or Blackboard.

We will not review the answers to all assignments in class, but if the answer to a problem is discussed in class, then late submission will not be possible for that problem. If the problem is part of a larger assignment, then the possible credit for the late work will be reduced by the value of that problem.

Late assignments will be reduced by 10% per week. For example, if a 100 point assignment is due in week 2, but is turned in in week 4, the maximum point allocation to that assignment will be 80 points. The 80 points will be assigned proportionately to the percentage of correct answers/total answers.
Extra Credit:

There may be possible extra credit assignments/activities opportunities during the semester.

Participation/Absenteeism
Students who attend class in person will be required to abide by a seating chart. If needed, this seating chart will be used by ASU for contact tracing purposes.

Please follow all COVID-19 guidelines provided by ASU (see https://www.angelo.edu/covid-19/) which includes daily health screenings when you will be on campus and may include moving the class online.

Please stay home if you feel ill, have any symptoms associated with COVID-19, or suspect you have been exposed to the virus. In-person attendance will not be a factor in the final grades, but the student still needs to inform the instructor of any conflict that can be anticipated and will affect the submission of an assignment or the ability to take an exam. Only the instructor can excuse a student from a course requirement or responsibility.

This class may go online for some, or all of the remainder, of the semester as required by ASU or at the discretion of the instructor. You will be advised by email or Blackboard if the class will be meeting online. During a period that the class is meeting online, exams given during that period will be online.

At this time, it is expected that all lectures will be recorded and placed Blackboard. Additional materials, including videos, will also be placed on Blackboard. If student cannot, or prefers not to, attend class or classes in person, it is the student’s responsibility to follow along. If you are not attending class in person, please notify the instructor so that arrangements can be made for exams.

When conflicts can be anticipated, such as for many University-sponsored activities and religious observations, the student should inform the instructor of the situation as far in advance as possible. For unanticipated or emergency conflict, when advance notification to an instructor is not possible, the student should contact the instructor as soon as possible by email.

Classroom Policies
Students are expected to display professional conduct during class. You should arrive on time and be in your seat at the scheduled class start time and when we return from breaks. In general, I will start exactly on time at the beginning of class and following breaks. However, if you must be late, please still come to class. I would rather you come I late than miss the material.

In addition to the above the following rules will also apply:
1. Programmable calculators, cell phone calculators, and mp3 players cannot be used during exams in this course. There are no exceptions to this rule.
2. Please do not disrupt the class by talking to others. If you have a question, please ask me.
3. Please turn off your cell phones so that it does not distract others. Also refrain from texting or surfing the internet during class. If you feel the need to do this, please leave the room and do not distract those around you.
4. You are the only one that can drop you from this course. I cannot drop you from the course. The last day to drop this class is **Friday, April 30, 2021**. Do not just quit coming to class. If you do you will receive an “F” in the course.

**Course Policies**

*Academic Honesty and Integrity*

Angelo State University expects its students to maintain complete honesty and integrity in their academic pursuits. Students are responsible for understanding and complying with the university Academic Honor Code, which is in both print and web versions of the ASU Student Handbook.

Academic integrity is expected. This includes, but is not limited to, any form of cheating, plagiarism, unauthorized sharing of work, or unauthorized possession of course materials. The professor assumes that all students can be trusted. Please do not violate this trust. Violation of academic integrity will result in a failing grade for the course.

It is the professor’s intention to be as fair and impartial as is humanly possible. Therefore, all students will be asked to adhere to the same set of guidelines and rules UNLESS there are disabilities or documented extenuating circumstances that have been discussed with the professor and the Student Life Office. Please make sure you inform the professor as soon as any situation arises. Do NOT wait until the problem is compounded by poor class performance, poor attendance, etc.

*Plagiarism*

Plagiarism is a serious topic covered in ASU’s Academic Integrity policy in the Student Handbook. Plagiarism is the action or practice of taking someone else’s work, idea, etc., and passing it off as one’s own. Plagiarism is literary theft.

In your discussions and/or your papers, it is unacceptable to copy word-for-word without quotation marks and the source of the quotation. It is expected that you will summarize or paraphrase ideas giving appropriate credit to the source both in the body of your paper and the reference list.

Papers are subject to be evaluated for originality via Turnitin. Resources to help you understand this policy better are available at the ASU Writing Center.

*Copyright Policy*

Students officially enrolled in this course should make only one printed copy of the given articles and/or chapters. You are expressly prohibited from distributing or reproducing any portion of course readings in printed or electronic form without written permission from the copyright holders or publishers.
**Code of Ethics**

Students, faculty, administrators and professional staff of the College of Business should always:

- Be forthright and truthful in dealings with all stakeholders
- Take responsibility for one’s actions and decisions
- Serve as an example of ethical decision-making and behavior to others
- Admit errors when they occur, without trying to conceal them
- Respect the basic dignity of others by treating them as one would wish to be treated

**Courtesy and Respect**

Courtesy and respect are essential ingredients to this course. We respect each other's opinions and respect others’ points of view at all times while in our class sessions. The use of profanity and harassment of any form is strictly prohibited (Zero Tolerance), as are those remarks concerning one's ethnicity, life style, religion, etc., violations of these rules will result in appropriate disciplinary actions.

**Required Use of Masks/Facial Coverings at Angelo State University**

As a member of the Texas Tech University System, Angelo State University has adopted the mandatory [Facial Covering Policy](#) to ensure a safe and healthy classroom experience. Current research on the COVID-19 virus suggests there is a significant reduction in the potential for transmission of the virus from person to person by wearing a mask/facial covering that covers the nose and mouth areas. Therefore, in compliance with the university policy students in this class are required to wear a mask/facial covering before, during, and after class. Faculty members may also ask you to display your daily screening badge as a prerequisite to enter the classroom. You are also asked to maintain safe distancing practices to the best of your ability. For the safety of everyone, any student not appropriately wearing a mask/facial covering will be asked to leave the classroom immediately. The student will be responsible to make up any missed class content or work. Continued non-compliance with the Texas Tech University System Policy may result in disciplinary action through the Office of Student Conduct.

**Accommodations for Disability**

ASU is committed to the principle that no qualified individual with a disability shall, on the basis of disability, be excluded from participation in or be denied the benefits of the services, programs or activities of the university, or be subjected to discrimination by the university, as provided by the Americans with Disabilities Act of 1990 (ADA), the Americans with Disabilities Act Amendments of 2008 (ADAAA), and subsequent legislation.

Student Affairs is the designated campus department charged with the responsibility of reviewing and authorizing requests for reasonable accommodations based on a disability, and it is the student’s responsibility to initiate such a request by emailing studentservices@angelo.edu, or by contacting:

Mrs. Dallas Swafford  
Director of Student Development  
Office of Student Affairs  
University Center, Suite 112  
325-942-2047 Office  
325-942-2211 FAX  
Dallas.Swafford@angelo.edu
Student absence for religious holidays

As stated in the Angelo State University Operating Policy and Procedures (OP 10.19 Student Absence for Observance of Religious Holy Day), a student who intends to miss class to observe a religious holy day should make that intention known in writing to the instructor prior to the absence. A student who is absent from classes for the observance of a religious holy day shall be allowed to take an examination or complete an assignment scheduled for that day within a reasonable time after the absence.

Course Drop

To view information about how to drop this course or to calculate important dates relevant to dropping this course, you can visit http://www.angelo.edu/services/registrars_office/course_drop_provisions.php.

Incomplete as a Course grade

As stated in the Angelo State University Operating Policy and Procedure (OP 10.11 Grading Procedures), the grade "I" is given when the student is unable to complete the course because of illness or personal misfortune. For undergraduates, an "I" that is not removed before the end of the next long semester automatically becomes an "F". A graduate student will be allowed one year to remove a grade of "I" before it automatically becomes an "F". To graduate from ASU, a student must complete all "I"s.

Grade Appeal Process

As stated in the Angelo State University Operating Policy and Procedures (OP 10.03 Student Grade Grievances), a student who believes that he or she has not been held to appropriate academic standards as outlined in the class syllabus, has experienced inequitable evaluation procedures, or inappropriate grading practices, may appeal the final grade given in the course. The burden of proof is upon the student to demonstrate the appropriateness of the appeal. A student with a complaint about a grade is encouraged to first discuss the matter with the instructor. For complete details, including the responsibilities of the parties involved in the grade appeal process and the number of days allowed for completing the steps in the process, see Operating Procedure 10.03 at: http://www.angelo.edu/content/files/14196-op-1003-grade-grievance.
## Tentative Course Outline - This schedule may change.

<table>
<thead>
<tr>
<th>Class Number</th>
<th>Week Number</th>
<th>Week Starting</th>
<th>Date</th>
<th>Day</th>
<th>Lesson</th>
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<tr>
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<td>24-Jan</td>
<td>25-Jan</td>
<td>M</td>
<td>Introduction and Establishing Facts</td>
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<td>27-Jan</td>
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<td>3</td>
<td>2</td>
<td>31-Jan</td>
<td>1-Feb</td>
<td>M</td>
<td>Tax Research Methodology – locate authority</td>
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<td>3-Feb</td>
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<td>8-Feb</td>
<td>7-Feb</td>
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<td>Tax Research Methodology – identify issues</td>
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<td>10-Feb</td>
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<td>15-Feb</td>
<td>14-Feb</td>
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<td>Tax Research Methodology – evaluate authority</td>
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<td>17-Feb</td>
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<tr>
<td>9</td>
<td>5</td>
<td>22-Feb</td>
<td>21-Feb</td>
<td>M</td>
<td>Tax Research Methodology – develop conclusions</td>
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<td>24-Feb</td>
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<td>11</td>
<td>6</td>
<td>1-Mar</td>
<td>28-Feb</td>
<td>M</td>
<td>Tax Research Methodology – communicate results</td>
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<td>8-Mar</td>
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<td>M</td>
<td>Writing Process</td>
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<td>9</td>
<td>21-Mar</td>
<td>22-Mar</td>
<td>M</td>
<td>Constitutional and legislative sources</td>
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<td>28-Mar</td>
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<td>Judicial sources</td>
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<td>11</td>
<td>5-Apr</td>
<td>4-Apr</td>
<td>M</td>
<td>Administrative sources</td>
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<td>12-Apr</td>
<td>11-Apr</td>
<td>M</td>
<td>IRS Practice and Procedure</td>
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<td>10-May</td>
<td>M</td>
<td>Final Project Due</td>
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<td>30-Apr</td>
<td>F</td>
<td>Last Day to drop</td>
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