

**Syllabus**  
***Introduction to International***  
***Taxation***  
**ACCT 70671**

**University of Notre Dame du Lac**  
**Mendoza College of Business**

**Fall – 2021**

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Text: None

**Course Description:**

Introduction to International Taxation, ACCT 70671 (1.5 credits)

Successful businesses are increasingly expanding their global footprint in search for new customers, more competitive supply chains, and profit opportunities. International tax professionals are being called upon to structure, report and pay taxes on these global business activities in an accurate and tax efficient manner. At the same time, tax laws around the world are changing at an accelerated pace, with each change introducing added complexity (and uncertainty). Local tax authorities have continued their quest for new revenue sources, and are growing substantially more aggressive and sophisticated in targeting MNC’s locally-based activities. At the same time, society is demanding MNCs and wealthy individuals “pay their fair share” of taxes – even if this requires paying taxes in excess of today’s tax rules, regulations and accepted tax practices.

This confluence has heightened the visibility, importance and complexity of tax departments in general, and international tax professionals specifically. This course is designed to introduce students to features of cross-border taxation, with an emphasis on U.S. income tax rules of both foreign corporations doing business in the U.S. (i.e., Inbound Investment) and U.S. MNCs doing business abroad (i.e., Outbound Investment). This course will pay particular attention to key changes introduced by the 2017 Tax Cut and Jobs Act, as well as recent actions by the Biden Administration, the European Union (“EU”) and the Organization of Economic Council of Development (“OECD”).

**Course Objectives:**

Most students graduating from the Mendoza College of Business will be hired by, or interact with, business ventures doing business globally. Graduates with either an accounting or tax concentration will be expected to be aware of and conversant in the complexities associated with

multi-national business arrangements. For some, there will be opportunities to specialize in the most complex and rewarding area of taxation – international tax.

The course will focus on U.S. corporate income tax rules and regulations. Corollary rules and provisions of foreign jurisdictions will be discussed to provide students with a global tax perspective. This course will provide an introductory framework of international taxation. Key tax rules and regulations will be presented to provide students with a fundamental understanding of global taxation. Calling upon my 38 years of international tax experience, I hope to use client situations to bring the material to life.

By its nature, the material is technical and complex. But as an introductory course, it is not the intent for students to get mired in the complexities of narrow and numerous exceptions of tax legislation. Memorization is not the objective. Rather, it is hoped students master the material sufficiently to be conversant and aware of the key principles driving international tax policy. Critical thinking is the objective – not memorization or achieving a grade.

In my experience, less-tenured staff are unaccustomed to reading, and are intimidated by, tax law (e.g., the Internal Revenue Code and Income Tax Treaties). Thus, another objective is to instill a “comfort” with reading the Internal Revenue Code, Treasury Regulations and Income Tax Treaties. Rather than designing a class content around a traditional text book chapter, advance reading will be directed at a specific Code section. I strongly encourage everyone to become familiar with Catalyst - Thompson Reuter’s CheckPoint available on Notre Dame’s digital library. You will need to register using your ND access.

**By design, weekly advance preparation will be minimal, but required.** Class time will be spent explaining the applicable code section (i.e., the subject of the pre-read), practical applications to most businesses, and how consultants deal with the vagaries associated from ambiguity and planning opportunities. The course has been designed akin to continuing education programs professionals attend post-graduation. Introducing students to their future learning style is another objective. One positive aspect of this learning approach is that advance preparation will be kept to a minimum!

Continuing with the object to prepare students for success within their career, I hope to give insight into various day-to-day actions and behaviors for students to differentiate themselves and succeed professionally. Sharing experiences from internships and recruiting expectations will be encouraged. I’ll add commentary about my experiences within public accounting and what I’ve witnessed within Corporate America. Another facet is skill-based readiness. For example, a course objective is to promote a student’s writing of a tax technical subject matter. Tax professionals are expected to write opinion letters, technical memoranda, summation of findings, etc. in a clear and concise fashion. A Written Essay will be a major component to the Learning Path.

### **Course Content and Layout:**

The course learning path will be divided into four main segments, including:

1. Overview of international taxation (defining key terms, common industry conventions, income tax treaties, etc.);
2. Inbound investment (e.g., U.S. withholding, tax nexus, earning stripping rules, etc.);
3. Outbound investment (e.g., foreign tax credits, anti-deferral rules, etc.); and

4. Global tax developments of the European Union and OECD – time permitted.

The course schedule, maintained on Sakai, will list required and optional readings and subject matters to be discussed each week. This schedule may be updated during the semester and is subject to change. Please frequently refer to the Sakai site.

It is intended to limit time required for weekly preparation for our class. Some level of advanced reading will be required. It is expected each student read the assigned materials and attend class to engage in dialogue.

With the time saved preparing for class each week, students will instead be required to submit a 8 - 10 page paper on an international tax matter of interest. The papers should contain a strong element of critical thinking. **Papers must be submitted no later than Sunday, September 19, 2021.** Students may work in groups of two (2) if they wish. Students have complete autonomy in selecting their subject international tax matter. I will be happy to discuss various choices, provide insight and direction, offer ideas and additional potential topics.... In fact, I would enjoy participating in student's selection of their subject matter. The following [link](#) will direct you to the Written Assignment instructions as well as a non-exclusive listing of some potential topics. The file can also be found on Sakai.

**Course Grade:**

Course grades will comply with the Mendoza College of Business grading guidelines. In all likelihood, I will curve the grades (up or down), accordingly.

Grades will be determined on the basis of total points earned. Points for this course are assigned as shown in the table below. Letter grades will be assigned based on relative performance on course materials. Notre Dame's MSA program specifies a mean GPA range for all MSA courses.

Written Essay	200	40%
Final exam (date and time TBA)	200	40%
Other assignments (participation, problem sets, professionalism, etc)	100	20%
Total points	500	100%

A portion of the 'other assignments' component will be your in-class participation and professionalism. I expect students to actively engage in the learning process during class time. This includes asking and answering questions during our discussions as well as class exercises, readings, etc. Professionalism includes both your participation in the learning process and the manner in which this is exhibited.

**Advance Reading:**

Advanced reading has been intentionally kept to a minimum. But students are expected to complete the reading assignment prior to each class. The assignment listing is in Sakai.

**Mendoza College of Business Graduate Academic Code of Honor:**

You are responsible to uphold The Mendoza College of Business Graduate Academic Code of Honor (see [Academic and Honor Codes](#)). The Code of Honor will be followed as described in the material. The Academic Code of Honor includes an understanding that all submitted work must be a student's own work. Any kind of academic dishonesty is a violation of the Code. If a student becomes aware of an Honor Code violation, he or she must take responsible action by notifying either the instructor or the Associate Dean (see section 4.4).