

Structuring a Tax Course to Develop Student Interaction and Analytical Skills: A Peer Review of Student Tax Memoranda

*Winner of the 2000 American Taxation Association/Arthur Andersen
Teaching Innovation Award, Undergraduate Course Category*

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AAA National Meeting, August 16, 2000

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*Instructors of tax courses are welcome to use these resources, but I have 2 requests:
Please give me credit for the development of these materials
Please let me know of ideas for the use/adaptation of these materials (so I can learn!)*

This document contains:

- Presentation outline, AAA National Meeting, August 16, 2000
- Overall Process for Research Case
- Review Sheet (Individual Review)
- Review Sheet (Group Review)
- Notes Provided to Students to Assist in Research and Writing Research Memoranda
- Excerpt from the Active Learning Exercises chapter in the American Taxation Association's Teaching Monograph, forthcoming February 2001
- Syllabus for Tax Research and Planning course (Spring 2000)

Information on PwC Case Studies in Tax:

PricewaterhouseCoopers Case Studies in Tax, edited by Betty R. Jackson, last updated in 1999, New York, NY: PricewaterhouseCoopers Foundation. [To obtain (free of charge to instructors) one copy each of the student materials and instructor manual, please contact Ms. Terry R. Harris (Phone: 212-259-1546; email: terry.r.harris@us.pwcglobal.com) at PricewaterhouseCoopers LLP, 1301 Avenue of the Americas, New York, NY 10019.]

Please contact me if you'd like more information.

Presentation outline, AAA National Meeting, August 16, 2000

Structuring a Tax Course to Develop Student Interaction and Analytical Skills:
A Peer Review of Student Tax Memoranda
by Marguerite (Zite) Hutton, PhD, CPA

The Challenge

To find ways to enhance:

- Student communication skills
- Student analytical skills
- Student research skills

(without condemning the instructor to grading-24-hours-per-day-for-life without parole)

A Response to the Challenge

- A model where students utilize a system of student peer review combined with “consulting group” interaction
(Currently used primarily in our *undergraduate* Tax Research and Planning course)

Exchanging Information

- Tax professionals accumulate information and research techniques through experience and through discussions with other tax practitioners – *a major resource in tax practice!*
- I have attempted to simulate this exchange of ideas and information through the use of “consulting groups”

Consulting Groups

- Students are assigned to groups based on work experience, previous tax courses, & tax experience (e.g., VITA)
- Each group consists of 4 to 5 students with diverse experience and course backgrounds. (All have had basic tax course.)
- Each student researches a different issue within a complex tax case.
- Students discuss each other’s research as the process evolves, primarily during class time. The instructor acts as a roving consultant.
- The group integrates their individual research results into a group memorandum or executive summary, complete with planning strategies.
- Students research a series of cases with increasing levels of technical difficulty as the course progresses
- Each group works on the same case
- For challenging cases, class is divided into “issue groups” also – students from the different consulting groups who are researching a particular issue

Issue Groups

- Members of the issue group discuss the issue at length to make sure that all researchers have a full understanding of the issue
- As research progresses, they share sources of information and relevant authority
- The use of issue groups has not resulted in uniform answers!

Peer Review Process

- All research cases are subject to two levels of double-blind student peer review before the cases are submitted to the instructor for grading
- Students use a review sheet as a guideline for evaluation
- 1st review: review of individual research
- 2nd review: individual and group review

Sample Evaluation Items

- Authority and reasoning supporting conclusions
- Clarity of memorandum (relevant facts, tax question, conclusion, reasoning)
- Proper citation format
- Professional appearance of work (visual & grammatical)

Guidelines

- Students must use constructive criticism, backed by thoughtful, helpful comments
- Review is done (in class) by a student who has researched the same issue
- Review sheets and overall process of case (and other information) are available (in Word format) at: <http://www.cbe.wvu.edu/hutton>

Results

- On anonymous evaluations, students were asked if their writing skills improved as a result of the review process
 - (“1” = not at all; “5” = very much)
 - 100% of students chose “2” through “5”
 - 2/3 of students chose “4” or “5”
- Spirit of camaraderie developed - everyone wanted to help everyone else

Overall Process for Research Case

1. The consulting group is assigned a case (divided into issues by the instructor).
2. The consulting group discusses the case and makes sure that it is understood. The class meets in issue groups to reinforce understanding of the case.
3. Each member of a consulting group researches his or her part of the case, conferring with other members of their consulting group and issue group, as needed.
4. Each consulting group member creates a memorandum of his or her part of the case.
5. A member of a different consulting group reviews the memorandum using a provided Review Sheet (exhibit 2).
6. The reviewer returns the memorandum to the researcher with the instructions: "Thoughtfully read the Review Sheet. Try not to be defensive. Carefully consider suggestions and implement those that have merit."
7. The researcher has the opportunity to rate the quality, thoroughness, and helpfulness of the review.
8. The researcher revises the memoranda.
9. The consulting group discusses the results, prepares an executive summary, and creates an organized case file. The executive summary states basic conclusions and enough information so that the reader knows how to locate supporting materials if he or she wants further details. The case is assembled into a coherent whole and the executive summary is not merely a "cut and paste" collection from the various separate pieces of research. If additional research appears necessary, the consulting group conducts it, adding the results to the case file.
10. Another consulting group reviews the case file using a provided Review Sheet (exhibit 3). This review includes a second review of each member's separate memoranda plus a group review of the executive summary.
11. Each researcher again has an opportunity to rate the quality of the review.
12. The consulting group makes final modifications to the case file.
13. The consulting group turns the case file in to the instructor.
14. Consulting group members evaluate the efforts of the other members of their groups.

Review Sheet (Individual Review)

Instructions to the reviewer:

- Read the memorandum prepared by the researcher. As you read, write comments (*constructive* comments, in a contrasting color; e.g., correct grammar, ask clarifying questions, tell the writer what worked and what didn't work) on the researcher's memorandum. IMPORTANT: "key" the comments to the review sheet by using the letters below (e.g., **A, B, C**, etc.)
- For *each* element below, rate the element as:
 1. Needs major improvement.
 2. Needs some improvement.
 3. Absolutely perfect as is.
- Where appropriate, for each element below, summarize your comments.
- You will be graded on the thoroughness and helpfulness of your review.

A. Were the relevant facts restated? 1 2 3 _____

B. Was the tax question(s) stated clearly? 1 2 3 _____

C. Was the basic conclusion(s) stated clearly? 1 2 3 _____

D. Was the reasoning & authority easy to follow? 1 2 3 _____

E. Proper citation format used? 1 2 3 _____

F. Authority easily distinguishable from the reasoning?.. 1 2 3 _____

G. Do the reasoning & authority support the conclusion? 1 2 3 _____

H. Spelling, grammar, complete sentences?..... 1 2 3 _____

I. Is the visual appearance professional? 1 2 3 _____

J. Does the memorandum make sense? Y N (circle one) _____

Overall comments: _____

Was the memorandum sufficiently incomplete so as to impede the review process? Y N
If so, what percentage of the grade for this assignment should be forfeited for this incompleteness?

Instructions to the researcher: Thoughtfully read the Review Sheet. Try not to be defensive. Carefully consider suggestions and implement those that have merit. Revise your memorandum. Read the revision. Work with your consulting group to combine the "pieces" into a comprehensive report.

Researcher's comments on (evaluation of) Reviewer (be professional!): _____

(*Why* were the comments useful or not? Make specific comments on the back of this page!)
Circle one: 3 (Exceeds expectations) 2 (Meets expectations) 1 (Below expectations)

Review Sheet (Group Review)

Instructions to the reviewing group:

- Read the executive summary prepared by the researcher group and review the overall case file. As you read, write comments (*constructive* comments, in a contrasting color; e.g., correct grammar, ask clarifying questions, tell the writer what worked and what didn't work) in the researcher group's case file. Summarize your comments below.
- For *each* element below, rate the element as:
 1. Needs major improvement.
 2. Needs some improvement.
 3. Absolutely perfect as is.
- You will be graded on the thoroughness and helpfulness of your review.

Was the executive summary easy to follow? 1 2 3 _____

Did the executive summary make sense? 1 2 3 _____

Was the case file well organized? (e.g., were the components of the case file integrated into a coherent whole, or was the case file disjointed?)..... 1 2 3 _____

Was the case file easy to reassemble? 1 2 3 _____

Was the case file a "complete package" - discussing the possible implications of the planned strategy? 1 2 3 _____

Were alternative planning strategies suggested, and presented in a complete fashion?
(e.g., having Tom participate in the original incorporation) 1 2 3 _____

Do the reasoning & authority support the conclusion? 1 2 3 _____

Spelling, grammar, complete sentences? 1 2 3 _____

Visually, was the case file professional?..... 1 2 3 _____

Overall, does the case file make sense? Y N (circle one) _____

Comments: _____

Researcher group's comments on (evaluation of) Reviewer group (be professional!): _____

(*Why* were the comments useful or not? Make specific comments on the back of this page!)
Circle one: 3 (Exceeds expectations) 2 (Meets expectations) 1 (Below expectations)

Notes Provided to Students to Assist in Research and Writing Research Memoranda

Research and analysis:

- Your written analysis should always start with the highest level of authority (e.g., the Internal Revenue Code) and work "downward," adding reasoning as you go.
- When you cite cases or rulings:
- Summarize the facts, decision, and the authority for the decision (citations need to be as specific as possible).
- State how the case or ruling is similar/dissimilar to/from your situation.
- State how the case or ruling influenced your reasoning/decision.
- Tie the authority into your situation using your reasoning. Think of "reasoning" as "glue." Authority should be clearly distinguished from reasoning. Some researchers like to put all "reasoning" in italics, in order to aid the reader/reviewer.
- If you find no cases or rulings on an issue, state this in your memorandum. Otherwise, it appears that you did not complete your research. (Always look for cases/rulings. Frequently, Internal Revenue Code sections appear to be very clear... until you look at cases and rulings that reveal how the Code was interpreted!)
- Do not ignore an authority when it is or seems opposite to your conclusion. You should state why it does not apply to your particular situation.
- Do not skip an issue just because you do not understand it. This is dangerous!
- Consider the consequences of a Code section applying or not applying to a situation. (For example: if you concluded that §351 does not apply to the situation, what are the tax consequences?)
- Watch for domino effects – when one item interacts with second, and the second interactions with a third, etc.
- Anticipate questions that the client might have about the situation and address them.

Organization:

- If you have multiple issues, clearly identify where one stops and another starts.
- Use a logical train of thought. There should not be gaps in your authority and reasoning.
- Avoid too much summarization if it is at the expense of a logical train of thought or reasoning.
- Make your memorandum easy to read.
- Do not treat the research memorandum as a theoretical exercise. It should have immediate practical use. Give clear examples where appropriate and use the taxpayer's facts and situation.
- Cross-reference or index supporting materials to the research memorandum if appropriate.
- In a tax class, the terms "section" and "Code" generally refer to a section of the Internal Revenue Code. It is not necessary to mention "I.R.C." or "the Code" in every reference since these are implicitly understood. If you refer to a section of other acts (e.g., the Uniform Partnership Act), such a reference should be clearly stated (e.g., U.P.A. Sec. 101).

The following is an excerpt from the Active Learning Exercises chapter in the American Taxation Association's Teaching Monograph, forthcoming February 2001.

It describes this teaching innovation in detail.

Please do not quote without permission.

Consulting Group Simulations

In practice, professionals frequently interact with a network of other tax professionals for the exchange of ideas and information about issues. A tax professional's database of information and research techniques, generally accumulated through experience and discussion with other tax practitioners, is one of the major resources used in tax practice. I have attempted to simulate this exchange of ideas and information through the use of "consulting groups" in my Tax Research and Planning course.

In that course, students are assigned to groups based on the results of a detailed questionnaire which includes questions on work experience, previous tax courses, and tax experience. Each group consists of four to five students with diverse experience and course backgrounds. All students have completed the basic course in taxation.

Each consulting group is assigned a complex case (e.g., from the *PricewaterhouseCoopers Case Studies in Tax*) with each individual in the group researching a different issue within the case. The consulting group allows the students to discuss each other's research as the process evolves and to integrate their individual research results for particular issues into an group memorandum or executive summary which includes planning strategies.

The research case assignments are designed to increase in difficulty as the course progresses. Feedback and consultations with both the consulting group and instructor, acting as a roving consultant, are utilized throughout the learning process in order to monitor student progress. Consultation is done primarily during class, while the actual research is done outside of class time.

Each consulting group in the class works on the same research case. Division of issues is done by the instructor, and, as mentioned earlier, each student in a group is assigned a

different part of the case. If groups have unequal size, the smaller group is assigned a smaller number of issues for their overall case. For challenging tax cases, I have found it extremely helpful to divide the class into “issue groups” as well. Each issue group consists of the students from different consulting groups who are researching a particular issue. Students generally benefit from discussing their part of the case with others researching the same issue. Members of the issue group discuss the issue at length to make sure that all researchers have a full understanding, and then, as research progresses, share sources of information and relevant authority. Interestingly, the use of issue groups does not result in uniform answers from students. Instead, it seems to assist students in gaining confidence in their own research and analytical skills.

Research memoranda undergo two rounds of double-blind peer review during class time prior to being submitted to the instructor for grading. The first review is of the individual research only, while the second review includes both an individual and a group review. This iterative procedure helps to ensure that students understand the issues that they are researching, that they have thought through the entire research process, and that they are effectively communicating their results in a professional memorandum. Exhibit 1 summarizes the overall process for the research and review process using consulting groups.

[Insert Exhibit 1 here; this is the “Overall Process” above, in this document]

In preparation for review, each student assembles a case file consisting of a memorandum of his or her research results, with authority, reasoning, and supporting documentation. Students are encouraged to get feedback from their consulting group prior to submission of the research findings for the review process. The case file contains no information that identifies the author of the file; instead it contains only an identification number (e.g., student B in consulting group 3 is designated as “3B”). This process allows for reasonably unbiased peer reviews within the class, even though the students understand that in professional tax practice one’s name would be known.

At the first level of a research case’s review, each student’s work is reviewed by an individual from another consulting group utilizing a “Review Sheet.” The Review Sheet instructs

the students to read the memorandum and write constructive comments (e.g., correct grammar, ask clarifying questions, tell the author what works and what does not work). A list of specific elements for evaluation and a rating mechanism for those elements is supplied. The Review Sheet for individual issues is shown in exhibit 2.

[Insert Exhibit 2 here; this is the "Review Sheet (Individual Review)" above, in this document]

The reviewer is encouraged to seek guidance and input from his or her consulting group as deemed appropriate. The reviewer, like the student researcher, is identified only by number. Students are instructed that it is imperative that the review process be conducted in a professional manner. When the review is complete, the case file is immediately returned, via the instructor, to the student researcher. At this point, the student researcher generally conducts additional research and meets with members of his or her consulting group and issue group prior to preparing for the second level of review. Prior to the second review, the consulting group assembles the individual components of the case into a group case file with an executive summary of the entire case, including planning strategies. The student researcher also rates the quality of the review as exceeding expectations, meeting expectations, or not meeting expectations.

The second review includes both an individual and group review. The individual review of the separate memorandum is performed by the same reviewer who prepared the first review. This allows the reviewer to see and evaluate the response to his or her comments and recommendations. If the student researcher chooses not to utilize suggestions of the reviewer, the researcher explains this decision in a professional manner on the Review Sheet. The format of the Review Sheet is the same for the first and second individual reviews. In contrast, the Review Sheet for the group review, presented in exhibit 3, is slightly different because it is performed by one consulting group for the work of another consulting group and it evaluates that group's executive summary, supporting research, and overall case file (e.g., reviewer 2A evaluates the work of researcher 3B for the second time, and consulting group 2 evaluates the work of consulting group 3 for the first and only time).

[Insert Exhibit 3 here; this is the "Review Sheet (Group Review)" above, in this document]

For the above process to work, all research assignments must be completed in a timely manner. Late assignments are penalized, with the level of penalty for incomplete work being a percentage of the individual portion of the grade for the case. Penalties are determined by reviewers and can be revised during the second review.

To assure that the groups are working together in a professional manner, each member of a consulting group completes a confidential evaluation of the other members of his or her consulting group and turns this evaluation in to the instructor on the day that the group's case file is collected. Evaluation criteria include the other group members' (1) understanding and resolution of their portion of the case, (2) preparation and willingness to work with the group, (3) participation in group discussion, (4) contribution of useful ideas and information, (5) effort to help others for best group performance, (6) professional demeanor, and (7) overall contribution to group performance.

Consulting groups remain together throughout the course, doing four case studies as well as a number of other projects. A percentage of the final course grade is based on the quality of case reviews and a peer evaluation by other members of a student's consulting group. Since attendance is necessary to realize the full benefit of the consulting groups, it is also a factor in the course grade.

(end of excerpt from ATA Teaching Monograph)

SYLLABUS for Tax Research and Planning course

ACC 477 TAX RESEARCH AND PLANNING
Monday and Wednesday 2:00 - 3:15 PM, ES 70

SPRING 2000

Professor: Dr. Zite (zeet) Hutton
Office: Parks Hall 451; Office Phone: (360) 650-4889
Email: Zite.Hutton@wwu.edu; Home page: <http://www.cbe.wwu.edu/hutton>
Office Hours: Monday & Wednesday: 3:30 – 4:30pm; Thursday: 1 - 3pm; other times by appointment.

Course Objectives:

Ethical [E] issues are covered throughout the course, as are the influence of legal [L] and regulatory [R] issues, and the political [P] and social [S] issues which affect taxation. The use of technology [T] is also a vital component of this course. The occurrence of these issues [E, L, R, P, S & T] are noted below.

Upon completion of this course, you should be able to:

- Identify tax issues for a variety of situations and tax entities [ELRPST];
- Research the issues and draw conclusions [ELRT];
- Use computerized tax tools and other appropriate technology [LRT];
- Offer alternative tax planning recommendations [ELR];
- Clearly communicate the results of your research and analysis in both written and oral formats [ELRT]
- Review and evaluate the work of other students [ELRT]
- Understand basic tax practice and procedure [ELRPS]

Course Materials: (REQUIRED)

1. Crumbley, *The Ultimate Rip-off: A Taxing Tale*, Revised Edition, (Thos. Horton & Daughters), **1998**.
2. Materials for assembly of case (e.g., portfolio, binder clips; determined in group)

Grading:

| | |
|--|-------------|
| Research Case #1 [ELRT]..... | 10% |
| Research Case #2 [ELRT]..... | 16% |
| Research Case #3 [ELRT]..... | 20% |
| Research Case #4 (preparation for Mock Tax Court) [ELRT] | 12% |
| Tax resource familiarization exercise [LR]..... | 2% |
| Quiz on <i>The Ultimate Rip-off</i> [ELRPS]..... | 10% |
| Issue identification/planning exercise (video) [ELRPST]..... | 15% |
| Class participation [EST] | 15% |
| TOTAL | <u>100%</u> |

Course Grading Scale:

| | | |
|--------------|--------------|--------------|
| 93 - 100 = A | 80 - 82 = B- | 67 - 69 = D+ |
| 90 - 92 = A- | 77 - 79 = C+ | 63 - 66 = D |
| 87 - 89 = B+ | 73 - 76 = C | 60 - 62 = D- |
| 83 - 86 = B | 70 - 72 = C- | Below 60 = F |

Issue Identification/Planning Exercise (video):

Each consulting group will view a contemporary movie, summarize it, then identify as many tax issues as possible and explain why they are issues, labeling each issue with the appropriate Code Section. The group will also prepare a list of tax planning recommendations to accompany the issues.

Research Cases:

The research case assignments are designed to increase in difficulty and expertise needed as the course progresses. Feedback and consultations with your consulting group and the professor will be utilized throughout the learning process in order to monitor student progress. Students will communicate the results of their research and offer tax planning opportunities through the use of memoranda and client letters. Knowing how to find the answer is only one part of the problem. It is also essential that you be able to communicate the results of research. Communication skills are necessary for a successful professional career. Therefore, in memoranda of research results, as in any professional communications, no spelling, grammar, or punctuation errors will be tolerated.

An additional goal in learning tax research is to make sure that the students become familiar with the various tax resources available. Therefore, for every research case done, each student must provide a copy of the *research trail* followed (as part of the supplemental materials in the case file). The research trail may be in rough (unrefined, handwritten) format. (When using CCH Online or Internet Tax Research Network (<http://tax.cch.com>), you can print your "research path.")

Each consulting group will research & offer planning strategies for each research case.

1. The group will be assigned a case.
2. The case will be divided into issues (by the instructor).
3. The group will discuss the case and make sure that *it is understood*.
4. Each member of a group will research *part* of the case (see #2 above).

5. Each group member will create a memorandum of their *part only of the case.
6. There will be a double-blind, in-class review of the separate memoranda.
7. Researchers will have the opportunity to "grade" the review they received.
8. Revisions will be made to the memorandum.
9. *The group will discuss the results and prepare an "executive summary" and create an organized case file. This includes planning strategies. (The "executive summary" should state basic conclusions, with sufficient brief information that the reader should only have to go to the supporting materials if he/she wants further in-depth details. When assembling the case into a coherent whole & writing the executive summary, interaction between the issues may require further group research, which should be included in the case file. The executive summary should NOT be merely a "cut & paste" collection from the various separate pieces of research.)
10. The entire file will be reviewed (double-blind, in-class) by another group. (This review includes a second review of the separate memoranda plus a *group review of the executive summary.)
11. Researchers will once again have the opportunity to "grade" the review they received.
12. Final modifications may be made to the group case file.
13. The case file will be turned in.
14. Group members will evaluate the efforts of the other members of their groups.

**Research Case #1 will not include an executive summary or group-level review, since all researchers will be doing the same case.*

Review and Grading of Research Cases:

*All assignments will be done **ON TIME**. "Late" assignments are not acceptable in tax practice, and will be penalized.*

Each student will create a memorandum of his/her portion of a research case.

The case file will contain **NO** information that identifies the author of the file, but will contain **only** the researcher's number (e.g., person B in Consulting Group 3 will be designated as "3B." This will allow reasonably unbiased peer review within the class. It is understood that one's actual name would be known in professional tax practice. Researchers are encouraged to get feedback from their consulting group *prior to* submission of the research findings for the review process. The reviewer should expect to receive a finished product from the researcher.

Review process:

A member of a different consulting group will perform the first review on the research case, utilizing the "Review Sheet" which is provided. The reviewer is encouraged, after an initial review of the file, to seek guidance/input from his/her consulting group if the reviewer believes that such input would be beneficial. The Review Sheet will also have a section for written comments (**constructive** criticism) by the reviewer. The reviewer will be identified only by number. It is **imperative** that the review process be conducted in a professional manner.

The second review will include both an individual and a group review:

- Individual review of separate memoranda by same reviewer
- Group review of executive summary, supporting research, and overall case file

The reviews will be done by the same person/group. This will allow the reviewer to see and evaluate the researcher's response to the reviewer's comments and recommendations. If the researcher chooses *not* to utilize suggestions of the reviewer, the researcher will indicate on the Review Sheet why the suggestions were not used. Be professional!

Quiz (on The Ultimate Rip-Off: A Taxing Tale):

A multiple choice quiz of approximately 20 questions will be utilized to encourage reading and understanding of The Ultimate Rip-Off: A Taxing Tale. The quiz will focus primarily on IRS procedures, terminology commonly used, and the structure and function of the IRS. (Quiz scheduled for Wednesday, May 10.)

Tax Resource Familiarization Exercises:

Reference search exercise (Wilson Library, worth 2 points) is due Monday, April 3.

Class Participation:

The class participation grade [15% of your course grade] will consist of the following:

- Posting to the ACCT 477 WebCT Bulletin Board by Wednesday, April 5th [1%]
- Participation (meaningful) in the ACCT 477 WebCT Bulletin Board [3%]
- Quality of case reviews (from recommendations by researchers) [5%]
- Evaluation by the members of your consulting group (based upon effort, participation in the group, professional demeanor, and cooperation) [3%]
- Attendance (this is necessary so that the full benefit of the consulting groups is realized) and participation in review process [3%]

Summary of Internet/computer needs for this class:

- Email address (through the University, or an Internet service provider).
- For ACCT 477 WebCT Bulletin Board: internet access, using a browser that supports "frames" (through any lab at WWU, CBE (PH210), or through a private Internet provider) [<http://webct.cbe.wvu.edu:8900>]
- For CCH tax research:
 - Internet access if you choose to use the CCH Internet Tax Research Network instead of (or in addition to) the CCH software, OR
 - PC (*not* Mac) at home with modem (check out software from Prof. Hutton), OR

- Account in CBE computer lab (PH210) [CCH software is in this lab ONLY]
(you can choose to use any combination of the above 3 options)
You will need your CCH User ID (handed out by Prof. Hutton) for access to CCH whether you connect from home or the PH210 lab.

Course Schedule:

ALL assignments are to be done by the beginning of class on the date assigned.

URO = The Ultimate Rip-Off: A Taxing Tale (all references are to Chapter numbers)

| DATE | IN-CLASS | URO |
|------|--|---------------|
| 3/29 | Introduction | |
| 4/3 | Discussion of Research Case #1 Turn in research questions for Research Case #1 Reference Search TRFE (Wilson Library) due | |
| 4/5 | Research #1(I) Must have posted Intro to the ACCT 477 WebCT Bulletin Board | 1 - 3 |
| 4/10 | Research #1 (II) | 4 - 5 |
| 4/12 | Discussion of Research #2 ALSO, <u>before</u> class on April 12 th , you must read & understand the basics of corporate formation (§ 351, etc. - use outline as a guide) | 6 - 8 |
| 4/17 | Research #2 (I) | 9 - 11 |
| 4/19 | Discussion of Research #2 | 12 - 15 |
| 4/24 | Research #2 (II) | 16 - 18 |
| 4/26 | Discussion of Research Case #3 | 19 - 21 |
| 5/1 | Research #3 (I) | 22 - 23 |
| 5/3 | Discussion of Research Case #3 | 24 - Epilogue |
| 5/8 | Research #3 (II) | |
| 5/10 | QUIZ on "The Ultimate Rip-off" | |
| 5/15 | Issue Identification/Planning Exercise due Research #4 Review (in group) & Mock Tax Court preparation | |
| 5/17 | Mock Tax Court | |
| 5/22 | Mock Tax Court | |
| 5/24 | Mock Tax Court | |
| 5/29 | HOLIDAY | |
| 5/31 | Class summarization | |
| 6/8 | "FINAL EXAM" (3:30 - 5:30, Thursday) To be discussed in class. | |