

Course Outline

Course Code	RSM 424 H1 F
Course Name	Matthew Roman
Term, Year	Fall, 2024
Course Meets	Mondays 11am to 1pm
Web page URL	https://q.utoronto.ca

Instructor Details

Name	Email	Phone	Office Hours	Virtual Office Link
Matthew Roman	Matthew.roman@rotman.utoronto.ca	416 646 8051	TBD	Available on Quercus

Course Description

This is the second in a two-course series in Canadian federal income taxation. The course is designed to give the student an understanding of more complex issues of Canadian income tax law and tax planning. Topics include computation of corporate taxes, corporate reorganizations, business acquisitions and divestitures, partnerships, joint ventures, and trusts. The two-course sequence (RSM324 & RSM424) has been designed to provide students with coverage of all the tax topics listed in the *CPA Competency Map*.

Learning Outcomes

By the end of this course, students will be able to:

- identify tax issues,
- determine the tax implications of the issues identified,
- analyse the alternatives, and
- prepare the appropriate communication.

Course Prerequisites

RSM324H1

Course Materials

Required Readings

1) Canadian Income Taxation – Planning and Decision Making, 2024-2025 edition with CONNECT PrePak © 2024, by Buckwold/Kitunen/Roman/Iqbal, published by McGraw-Hill Education.

Note – due to significant tax changes resulting from the 2024 federal budget, the 2023-2024 edition of the text cannot be used this term. Students will need the latest edition.

2) Income Tax Act. Students are NOT required to purchase a copy of the Income Tax Act. The Act will be referenced in the text and in the lectures. You can access a copy of the Act at https://edu.knotia.ca.myaccess.library.utoronto.ca/Home.aspx or at https://laws-lois.justice.gc.ca/eng/acts/i-3.3/

Electronic Course Materials

This course will be using the following electronic course materials:

- Income Tax Act, and
- **CONNECT**, which contains self-study questions and assignment questions, as well as solutions to review questions & key concept questions from the text.

There is no charge for the use of the electronic Income Tax Act. The printed text with Connect retails for \$159.95. The printed text alone retails for \$149.95. Connect with E-Book retails for \$99.00. Connect without the E-Book retails for \$65. The use of these materials complies with all University of Toronto policies which govern fees for course materials.

Evaluation and Grades

Grades are a measure of the knowledge and skills developed by a student within individual courses. Each student will receive a grade on the basis of how well they have command of the course materials, skills and learning objectives of the course.

Work	Percentage of grade	Due Date
Participation/Attendance	5%	Ongoing
Connect Homework	10%	Ongoing
Connect Quizzes	15%	September 23
		Nov 4
		November 11
		December 3
Term Test	30%	October 21 (during
		class)
Final Assessment	40%	TBA
Total	100%	

Course Format and Expectations

Class Participation

The 5% grade component for participation is being awarded as an additional incentive for students to do the readings and problems/cases assigned each week and to actively participate in discussions. Learning and retention can be increased substantially through active discussion. Additional details will be provided on Quercus.

Some of the behaviors that contribute to effective participation are captured in the questions that follow:

- 1) Is the participant a good listener?
- 2) Are the points that are made relevant to the discussion? Are they linked to the comments of others?
- 3) Do the comments show evidence of preparation for the class?
- 4) Is there a willingness to share knowledge and ideas with other class members?
- 5) Do comments clarify important aspects of earlier comments and lead to a clearer statement of the concepts being covered?

Connect Homework:

There are 10 homework assignments in total for 10% of the final grade. These questions are similar to the end of textbook materials. **You are allowed a maximum of three attempts and only the highest attempt will count**. Your score will be shown after each attempt, and you can use your previous attempt as a starting point for your next attempt (as opposed to starting over). The full solution is available after your final attempt. Homework assignments are due by **11:59pm on Sundays**. Details regarding assignment due dates will be posted to Quercus.

Connect Quizzes:

These are online quizzes that are to be completed on CONNECT (as purchased with the textbook) by the scheduled due date. You only get one attempt, so do not start the quiz until you are prepared to take it. The submissions are graded within CONNECT and students will have access, through CONNECT, to their grades one hour after the deadline for each assignment. Please ensure that you have access to CONNECT. There are a total of four (4) CONNECT quizzes for a total of fifteen (15) marks toward the final course grade.

Missed Tests and Assignments

Students who miss a term test or assignment for reasons entirely beyond their control (e.g. illness) may request special consideration **within 2 business days** of the missed midterm/test/assignment due date.

In such cases, students must:

- 1. Complete the Request for Special Consideration form: https://uoft.me/RSMConsideration
- Provide documentation to support the request, eg. Absence Declaration from <u>ACORN</u>, medical note etc.

Please note: As of September 2023, students may use the Absence Declaration on ACORN *one time per term* to report an absence and request consideration. Any subsequent absence will require a <u>Verification of Illness form</u> or other similar relevant documentation.

Students who do not submit their requests and documentation within 2 days may receive a grade of 0 (zero) on the missed course deliverable.

In the case of a missed term test, a make-up test will not be provided. The weight of the term test (40%) will be added to the weight of the final assessment such that the final assessment will form 70% of the overall course grade.

Final Exams: If you miss the final exam in this course for a legitimate reason (illness, etc) you will need to contact your College Registrar to file a petition for a deferred exam. This deferred exam will be written at a later date as established by the Faculty of Arts & Science. Instructions can be found here: https://www.artsci.utoronto.ca/current/faculty-registrar/petitions-appeals/preparing-petition

Late Assignments

Connect assignments and quizzes that are late will be awarded a zero grade. The instructor can be contacted for an extension in situations where there are extenuating circumstances that

prevent the student from submitting on time. Extensions will be granted at the discretion of the instructor based on the specific facts and circumstances behind the request.

Statement on Equity, Diversity and Inclusion

The University of Toronto is committed to equity, human rights and respect for diversity. All members of the learning environment in this course should strive to create an atmosphere of mutual respect where all members of our community can express themselves, engage with each other, and respect one another's differences. U of T does not condone discrimination or harassment against any persons or communities.

Commitment to Accessibility

The University is committed to inclusivity and accessibility, and strives to provide support for, and facilitate the accommodation of, individuals with disabilities so that all may share the same level of access to opportunities and activities offered at the University.

If you require accommodations for a temporary or ongoing disability or health concern, or have any accessibility concerns about the course, the classroom or course materials, please <a href="mailto:emailto:

Plagiarism Detection

Normally, students will be required to submit their course essays to the University's plagiarism detection tool for a review of textual similarity and detection of possible plagiarism. In doing so, students will allow their essays to be included as source documents in the tool's reference database, where they will be used solely for the purpose of detecting plagiarism. The terms that apply to the University's use of this tool are described on the University's Plagiarism Detection Tool FAQ page from Centre for Teaching Support & Innovation.

Generative AI / ChatGPT

The knowing use of generative artificial intelligence tools, including ChatGPT and other Al writing and coding assistants, for the completion of, or to support the completion of, an examination, term test, assignment, or any other form of academic assessment, may be considered an academic offense in this course.

Academic Integrity

Academic Integrity is a fundamental value essential to the pursuit of learning and scholarship at the University of Toronto. Participating honestly, respectfully, responsibly, and fairly in this academic community ensures that the U of T degree that you earn will continue to be valued and respected as a true signifier of a student's individual work and academic achievement. As a result, the University treats cases of academic misconduct very seriously.

<u>The University of Toronto's Code of Behaviour on Academic Matters</u> outlines the behaviours that constitute academic misconduct, the process for addressing academic offences and the penalties that may be imposed. You are expected to be familiar with the contents of this document. Potential offences include, but are not limited to:

In papers and assignments

- Using someone else's ideas or words without appropriate acknowledgement.
- Submitting your own work in more than one course without the permission of the instructor.
- Making up sources or facts.
- Obtaining or providing unauthorized assistance on any assignment (this includes collaborating with others on assignments that are supposed to be completed individually).

On test and exams

- Using or possessing any unauthorized aid, including a cell phone.
- Looking at someone else's answers.
- Misrepresenting your identity.
- Submitting an altered test for re-grading.

Misrepresentation

- Falsifying institutional documents or grades.
- Falsifying or altering any documentation required by the University, including (but not limited to) medical notes.

All suspected cases of academic dishonesty will be investigated by the procedures outlined in the <u>Code of Behaviour on Academic Matters</u>. If you have any questions about what is or is not permitted in the course, please do not hesitate to contact the course instructor. If you have any questions about appropriate research and citation methods, you are expected to seek out additional information from the instructor or other U of T or RC resources such as the RC Centre for Professional Skills, the College Writing Centres or the Academic Success Centre.

Email

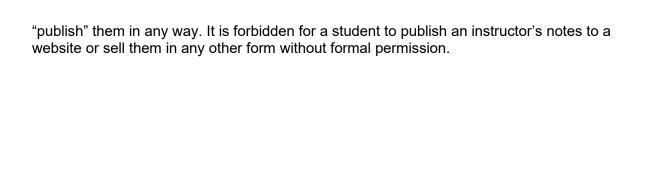
At times, the course instructor may decide to communicate important course information by email. As such, all U of T students are required to have a valid UTmail+ email address. You are responsible for ensuring that your UTmail+ email address is set up and properly entered on ACORN. For more information visit the <u>Information Commons Help Desk</u>.

Forwarding your utoronto.ca email to a Gmail or other type of email account is not advisable. In some cases, messages from utoronto.ca addresses sent to Gmail accounts are filtered as junk mail, which means that important messages from your course instructor may end up in your spam or junk mail folder.

Recording Lectures

Lectures and course materials prepared by the instructor are considered by the University to be an instructor's intellectual property covered by the Canadian Copyright Act. Students wishing to record a lecture or other course material in any way are required to ask the instructor's explicit permission and may not do so unless permission is granted. Students who have been previously granted permission to record lectures as an accommodation for a disability are excepted. This includes tape recording, filming, photographing PowerPoint slides, Quercus materials, etc.

If permission for recording is granted by the instructor (or via Accessibility Services), it is intended for the individual student's own study purposes and does not include permission to





Weekly Schedule

Week #	Week starting	Topic	Text reading(s)	
1	Sept 9	Introduction	Chapter 11	
		Relationship between the Corporation and its Shareholders	Chapter 11	
		Determination of Taxable Income for a corporation		
		Loss restriction events (acquisition of control)		
		The Integration of Corporate and individual Taxation		
2	Sept 16	Organization, Capital Structures and Income Distributions of Corporations	Chapter 12	
		Corporate capitalization – Debt or Equity		
		Transferring Assets to a Corporation Corporate Distributions to Shareholders [ITA 85]		
		Stop loss rules		
3	Sept 23	Canadian-Controlled Private Corporations Definition and Basic Principles	Chapter 13 (Parts I to III and Part VII)	
		Taxation of Income Earned by a Canadian-Controlled Private Corporation		
		Overall Tax Calculation for a Canadian-Controlled Private Corporation		
4	Sept 30	Limitations to the Small Business Deduction Associated Corporations	Chapter 13 (Part VI)	
		Taxable Capital		
		Adjusted aggregate investment income		
		Specified corporate income		
5	Oct 7	Corporate distributions - dividends and salary	Chapter 13 (Parts IV	
		Ordering of CCPC distributions	and V)	
		General Rate Income Pool Capital Dividends		
		Shareholder Loans		
		TERM TEST (held during regular class hours)		
6	Oct 21	covers class 1 through 5		

7	Nov 4	General partnerships Limited partnerships Trusts Joint Ventures	Chapters 15, 16 and 17
8	Nov 11	Sale of Assets vs. Sale of Shares Qualifying Small Business Corporation Shares	Chapter 18 Chapter 10 (Part IV)
9	Nov 18	Sale of Assets vs. Sale of Shares – continued from previous class	No new readings
10	Nov 25	Tax Planning and Corporate Reorganizations Other Rollovers and Estate Freezes [ITA 85.1 and 86] Anti-Avoidance Rules: Surplus Stripping [ITA 84.1; 55(2)] General Anti Avoidance Rule: ITA 245	Chapter 14 (Part I Section E and Part II) Chapter 19 (except amalgamations/windups) Chapter 2
11	Dec 2	GST/HST basics Small suppliers Reporting periods Place of supply rules Input tax credits	Chapter 22 (Parts I and II)
12	Dec 3 (make up date for Thanksgivin g)	Streamlined methods for calculating net tax Employee benefits and employment expenses Rules with respect to real property Special situations Administrative matters	Chapter 22 (Parts III to VII)
Final Exam		Details to come	

Please note that the last day you can drop this course without academic penalty is November 4, 2024.



Other Useful Links

- Become a volunteer note taker
- Accessibility Services Note Taking Support
- Credit / No-Credit in RSM courses
- Rotman Commerce Academic Support
- Where to find teaching assistant opportunities

URL links for print

- ACORN: http://www.acorn.utoronto.ca/
- Email Accessibility Services: accessibility.services@utoronto.ca
- Accessibility Services website: http://studentlife.utoronto.ca/as
- University's Plagiarism Detection Tool FAQ: https://uoft.me/pdt-faq
- The University of Toronto's Code of Behaviour on Academic Matters: http://www.governingcouncil.utoronto.ca/policies/behaveac.htm
- Information Commons Help Desk: http://help.ic.utoronto.ca/category/3/utmail.html
- Become a volunteer note taker: https://studentlife.utoronto.ca/program/volunteer-note-taking/
- Accessibility Services Note Taking Support: https://studentlife.utoronto.ca/service/note-taking-support/
- Credit / No-Credit in RSM courses: https://rotmancommerce.utoronto.ca/current-students/degree-requirements/credit-no-credit-option/
- Rotman Commerce Academic Support: https://rotmancommerce.utoronto.ca/current-students/academic-support/
- Book an appointment with a writing or presentation coach: http://uoft.me/writingcentres
- Writing and Presentation Coaching academic support page: https://rotmancommerce.utoronto.ca/current-students/academic-support/writing-and-presentation-coaching/
- Centre for Professional Skills Teamwork Resources page: https://rotmancommerce.utoronto.ca/teamwork-resources
- Book an appointment with a Teamwork Mentor: http://uoft.me/writingcentres