



## **Action 13: Country-by-Country Reporting (CbCR)**

Colleges and Universities

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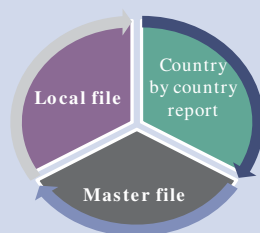
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## Agenda

- Action 13 Background and Overview
- Application to Colleges and Universities
- Roadmap

## Action 13 Overview and Background

### The OECD's Approach



#### Objectives

Provide a high-level overview in order to place the MNE group's transfer pricing practices in their global economic, legal, financial and tax context

Provide assurance that the taxpayer has complied with the arm's length principle in its material transfer pricing positions affecting a specific jurisdiction

Support high level transfer pricing risk assessment

#### Three-Tiered Approach

**Master file: 'blueprint' of MNE's business**

**Local file: detailed information on specific intercompany transactions**

**Country-by-country report: aggregated information on revenues, profits, taxes and indicators of economic activity**

## Filing and notification: US regulations



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Every ultimate parent entity of a US multinational enterprise (MNE) group with annual revenue for the immediately preceding reporting period > \$850 million.

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First appeared as part of the conference materials for the  
5<sup>th</sup> Annual Higher Education Taxation Institute session  
"Country-by-Country Reporting"