



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

Colleges and Universities

Disclaimer

This material has been prepared for general informational and educational purposes only and is not intended, and should not be relied upon, as accounting, tax, or other professional advice. Please refer to your advisors for specific advice.

Today's presenters

Robert Friz
Partner, PwC LLP
Robert.w.friz@pwc.com

Neelu Mehrotra
Executive Director
Ernst & Young LLP
Neelu.Mehrotra@ey.com

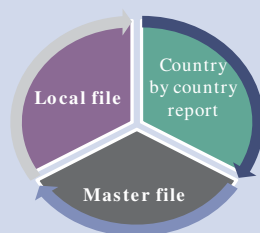
Julia Shahan
Executive Director, Tax
Columbia University
Js4717@Columbia.edu

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



Filing and notification: US regulations



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

Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the [UT Law CLE eLibrary \(utcle.org/elibrary\)](http://utcle.org/elibrary)

Title search: Action 13: Country-by-Country Reporting (CbCR) — Colleges and Universities

Also available as part of the eCourse

[Country-by-Country Reporting for Universities](#)

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