

# Sales Taxation of Online Education

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1

## Agenda

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- Why now?
- Taxation of digital goods and services
- Exclusions and exemptions for online education
- Advanced issues
- Next steps



2

2

## Why Now?

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- The world has changed.
  - We are all selling online education.
  - Our students are across state lines.
- The law has changed.
  - Under *South Dakota v. Wayfair*, economic nexus can suffice.
  - *Plus*: Remote employees may trigger nexus with physical presence.
- The law is still changing.
  - Taxation of digital goods and services is expanding.

3

## A Year of Online Education

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4

# Digital Goods

Tangible Personal Property

Digital Goods



**NETFLIX**

# Base Erosion

Tangible Personal Property

Digital Goods



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