

Sales Taxation of Online Education

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Agenda

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



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Why Now?

- 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.

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A Year of Online Education



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Digital Goods

Tangible Personal Property

Digital Goods

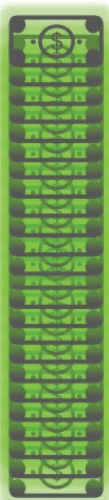


NETFLIX

Base Erosion

Tangible Personal Property

Digital Goods



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