

2015 Higher Education Taxation Institute
June 7-9, 2015 • AT&T Conference Center • Austin, TX

Sunday Afternoon, June 7, 2015

Presiding Officer:

Kyle R. ZumBerge, The University of Texas System Office of General Counsel - Austin, TX

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| 2:00 pm | Registration Opens Includes light refreshments. |
| FUNDAMENTALS OF HIGHER EDUCATION TAXATION ISSUES | |
| 2:50 pm | Welcoming Remarks |
| 3:00 pm 1.00 hr | Fundamentals of Section 501(c)(3) Status An overview of the requirements of section 501(c)(3) as they apply to universities, foundations and other types of entities. Richard A. Speizman, KPMG LLP - Washington, DC |
| 4:00 pm 1.00 hr | Fundamentals of UBIT and Qualified Sponsorships Knowing the basics is essential in determining whether unrelated business income (UBI) exists. Learn some of the reasons for unrelated business income tax (UBIT) and the three basic requirements, review the exceptions and exclusions for UBIT; plus, understand the basics of qualified sponsorships. Joseph R. Irvine, The Ohio State University - Columbus, OH |
| 5:00 pm | Break |
| 5:15 pm 1.00 hr | Fundamentals of Fringe Benefits Fringe benefits are an important part of any employment package. Understand the tax complexities that go along with common perks and benefits. Tracy Paglia, Moss Adams LLP - Stockton, CA |
| 6:15 pm 1.00 hr | Tax Fundamentals of Scholarships and Fellowships An introductory level examination of the federal income tax treatment and reporting obligations involving scholarships and fellowships, including qualified scholarship awards and related expenses, tuition reduction arrangements, and the tax and reporting treatment of awards with employment or other service obligations. Sean P. Scally, Vanderbilt University and Medical Center - Nashville, TN |
| 7:15 pm | Welcome to Texas Reception and Buffet Meet and network with your fellow colleagues and enjoy Texas barbeque and live music. |

Monday Morning, June 8, 2015

Presiding Officer:

Mary M. Bachinger, National Association of College and University Business Officers (NACUBO) - Washington, DC

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| 7:45 am | Conference Room Opens Includes continental breakfast. |
| 8:30 am 1.00 hr | Recent Developments in College and University Tax Law Recent tax law developments that affect institutions of higher education, including updates on Congressional activity, IRS enforcement initiatives and pronouncements, and judicial decisions. Bertrand M. Harding Jr., Law Offices of Bertrand M. Harding Jr. - Alexandria, VA |
| 9:30 am 0.75 hr | Understanding UBIT for Digital and Online Activities Colleges and universities conduct a myriad of activities online, particularly through their website, including education, publishing, advertising, sponsorship and sale of merchandise. An institution may conduct the activities itself or in conjunction with a service provider or other "partner." Applying IRS current guidance in these areas often raises issues, especially since the guidance has not kept pace with the changes in technology. Explore various online/digital activities, examine the potential unrelated business implications and discuss possible alternatives to unrelated business income tax treatment. Richard J. Locastro, Gelman, Rosenberg & Freedman - Bethesda, MD |
| 10:15 am | Break |
| 10:30 am 1.25 hrs | Nonresident Alien Tax Issues—Digging Deeper Review the complexities of paying foreign entities that receive U.S.-sourced income payments from start to possible tax exemption to reporting. Plus, look at specific cases to see what's really happening and how to deal with the nonresident alien tax issues that emerge. Donna Kepley, Arctic International LLC - Austin, TX |
| 11:45 am 0.50 hr | FATCA: What it Means For Your Institution The new Foreign Account Tax Compliance Act (FATCA) regulations impact institutions with foreign academic, research or investment activities. Hear planning strategies and best practices for addressing FATCA compliance at your institution. Bob Lammey, Ernst & Young LLP - Boston, MA Lauren Weronick, Ernst & Young LLP - Austin, TX |
| 12:15 pm | Pick Up Lunch Included in registration. |

Monday Afternoon, June 8, 2015

Presiding Officer:

Joseph R. Irvine, The Ohio State University - Columbus, OH

LUNCHEON PRESENTATION

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| 12:35 pm 0.75 hr | <p>What's on the Horizon: Legislative and Policy Outlook for Colleges and Universities</p> <p>A look from inside the beltway at how Congress is addressing current tax issues affecting higher education institutions; plus what you need to know about approaching excise taxes on high-cost health plans.</p> <p>Richard A. Grafmeyer, Capitol Tax Partners - Washington, DC</p> |
| 1:20 pm | <p>Break</p> |
| 1:35 pm 0.75 hr | <p>Tax Aspects of Settlement Payments</p> <p>An overview of proper tax reporting and withholding treatment of settlement payments arising from agreements to resolve and release the educational institution from actual or threatened claims of legal action by employees, former employees, students or others.</p> <p>Sean P. Scally, Vanderbilt University and Medical Center - Nashville, TN</p> |
| 2:20 pm 1.00 hr | <p>Alternative Investments: Navigating the New Normal</p> <p>Many organizations that are invested in alternative investments are faced with managing the related risk and compliance. Walk through the technical tax aspects of alternative investments and hear best practices to manage organizational risk and compliance.</p> <p>Moderator: Jackie Coburn, Crowe Horwath LLP - Dallas, TX Panelists: Rick Klee, University of Notre Dame - Notre Dame , IN David L. Stark, KPMG LLP - Greensboro, NC</p> |
| 3:20 pm | <p>Break</p> |
| 3:30 pm 0.75 hr | <p>Issuing and Processing Tax-Exempt Bonds</p> <p>Gain a better understanding of tax responsibilities connected to all phases of debt issuance, including an overview of how the tax and debt management functions interact throughout the debt issuance phase, with a discussion of project spending, reimbursements, private use, arbitrage, and allocations.</p> <p>Kelly Farmer, University of Minnesota - Minneapolis, MN Carole Fleck, University of Minnesota - Minneapolis, MN</p> |
| 4:15 pm 1.00 hr | <p>Beyond the University: Structuring, Creating, and Maintaining Related Entities</p> <p>Analyze different uses of related organizations by colleges and universities, and learn best practices for entity choice and creation (taxable, disregarded or tax-exempt), corporate governance, tax compliance, and tax planning.</p> <p>Erin Couture, PwC - Boston, MA Ben Davidson, Stanford University - Palo Alto, CA</p> |
| 5:15 pm | <p>Adjourn</p> |

Tuesday Morning, June 9, 2015

Presiding Officer:

Mike Sorrells, BDO USA, LLP - Bethesda, MD

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| 7:45 am | Conference Room Opens Includes continental breakfast. |
| 8:30 am 1.50 hrs | Athletics and Tax A discussion about the tax issues on your Athletic Director's mind, including qualified sponsorship, licensing, equipment and apparel deals, compensation and fringe benefits for coaches, personal appearances, endorsements, facility rental, UBIT, charitable giving, and more. Ben Davidson, Stanford University - Palo Alto, CA Rick Klee, University of Notre Dame - Notre Dame , IN Joel Levenson, University of Central Florida - Orlando, FL |
| 10:00 am | Break |
| 10:15 am 1.00 hr | Tax Issues in Research and Technology Identify various tax issues connected to university conducted research and resulting technology and come away with information on how to work through tax issues connected to these important areas. Moderator: Kelly Farmer, University of Minnesota - Minneapolis, MN Panelist: Bertrand M. Harding Jr., Law Offices of Bertrand M. Harding Jr. - Alexandria, VA Sean P. Scally, Vanderbilt University and Medical Center - Nashville, TN |
| 11:15 am 1.00 hr | IRS Audit Experiences: Lessons Learned Insight on dealing with an IRS audit and strategies on best practices in preparing for future examinations, ranging from managing net operating losses (NOLs) from unrelated business taxable income (UBTI) to reviewing and possibly revising contracts with respect to employment agreements, sponsorship arrangements, and other matters. Moderator: Joel Levenson, University of Central Florida - Orlando, FL Bertrand M. Harding Jr., Law Offices of Bertrand M. Harding Jr. - Alexandria, VA Rick Klee, University of Notre Dame - Notre Dame , IN |
| 12:15 pm | Adjourn |