

TAXATION - EXECUTIVE PROGRAM (LLM)

NYSED: 32015 HEGIS: 1499 CIP: 22.0211

Program Description

In this LLM specialization (<https://www.law.nyu.edu/llmjsd/executivellmtax/>), you can be part of the most prestigious graduate tax program—from anywhere in the world.

The NYU Law Graduate Tax Program is the preeminent program of its kind, offering dozens of courses taught by the country's most respected academics and leading practitioners (<https://www.law.nyu.edu/tax/taxprogramfaculty/>). This innovative part-time program uses a cutting-edge online video system to offer students the opportunity to take many of these same courses and to have the same high quality educational experiences as on-campus students. You can complete the entire degree by participating in online courses, and are welcome to take some classes on campus in Greenwich Village as well.

Admissions

- Eligibility and Admission Standards (<https://www.law.nyu.edu/graduateadmissions/eligibilityandstandards/>)
- How to Apply (<https://www.law.nyu.edu/graduateadmissions/>)
- Scholarships and Financing (<https://www.law.nyu.edu/graduateadmissions/scholarshipprograms/>)

Admission to the Executive LLM program is highly selective. Executive LLM students must meet the same admission standard as our on-campus students. To apply, you must hold a first degree in law (JD or LLB) from a law school that is approved by the Section of Legal Education of the American Bar Association or a bachelor of law degree from a non-US law school approved by its foreign equivalent. For more information on application requirements, please visit our How to Apply (<http://www.law.nyu.edu/graduateadmissions/>) page. If you would like to discuss which of our tax programs best suits your needs, please contact us (law.taxprograms@nyu.edu).

Program Requirements

The Executive LLM in Taxation requires 24 credits of study, 20 of which must be in advanced tax courses taken through NYU. "Advanced tax courses" are any tax courses at NYU excepting Income Taxation, Survey of Securities Regulation, and Survey of Income Tax. Many, but not all of our tax classes are offered online. Feel free to contact us if you have a question about whether a specific course will be offered online. All 24 credits of coursework required for the Executive LLM in Taxation may be completed through online study, which is not the case with our other degree programs. The only specific requirement is that students must take a course in tax procedure. Several courses meet this requirement, including Survey of Tax Procedure (1 credit), Tax Procedure (2 credits), and Tax Penalties and Prosecutions (2 credits).

Aside from the requirement to complete a course in tax procedure, students are free to design their curriculum to suit their individual needs. One course that all students should consider taking is "Taxation of Property Transactions." This course gives you a "basis" in the issues and concepts that pervade tax law. The instructors in the more advanced

courses assume that all students have mastered this material and do not spend class time reviewing these issues and concepts.

For those students interested in designing their program of study to concentrate on areas of particular interest (<http://www.law.nyu.edu/tax/academicprograms/graduatetaxprogram/suggestedcurricula/>), the Graduate Tax Program provides suggested courses of study for the following areas: General Taxation, Business Taxation, International Taxation, Estate Planning, and Tax Policy.

| Course | Title | Credits |
|------------------------------|---|-----------|
| Major Requirements | | |
| Select one of the following: | | 1-2 |
| | LAW-LW 10707 Survey of Tax Procedure | |
| | LAW-LW 11137 | |
| | LAW-LW 10744 Civil Tax Controversies and Litigation | |
| Electives | | |
| Other Elective Credits | | 22 |
| Total Credits | | 24 |

Sample Plan of Study

| Course | Title | Credits |
|--------------------------|--------------------------------------|----------------|
| 1st Semester/Term | | |
| | Corporate Taxation I & II | 4 |
| | Taxation of Property Transactions | 3 |
| | International Tax I & II | 4 |
| | | Credits |
| | | 11 |
| 2nd Semester/Term | | |
| | International Tax III | 2 |
| | Tax Policy | 2 |
| | Partnership Taxation | 3 |
| | Survey of Tax Procedure | 2 |
| | | Credits |
| | | 9 |
| 3rd Semester/Term | | |
| | LAW-LW 10707 Survey of Tax Procedure | 1 |
| | Elective | 3 |
| | | Credits |
| | | 4 |
| Total Credits | | 24 |

Learning Outcomes

In accordance with Revised ABA Standard 302; N.Y. Court of Appeals Rule 520.18(a)(1) please find an inventory of student learning outcomes that covers the areas of "substantive knowledge and procedural law"; lawyering skills; and "proper professional and ethical responsibilities to clients and the legal system."

Tax Law

Tax law is relevant to a wide variety of legal matters, from corporate transactions to divorce negotiations to criminal prosecutions. At the federal level, the tax law is the primary means by which the government attempts to influence behavior in order to achieve public policy objectives, whether by encouraging individuals to donate money to charity, purchase health insurance or even ride public transportation to work. The basic *Income Taxation* course features a deep exploration of statutory law and examines why legislators drafted particular provisions of the tax law the way they did and whether they achieved their intended policy objectives. In order to take advantage of the vast tax curriculum at the Law School, the tax faculty strongly recommends that students enroll in *Income Taxation* during their 1L or 2L year, if possible. Students

who desire to study tax further should next enroll in *Corporate Tax I & II*, which examines the federal income tax treatment of corporations and their shareholders arising from various transactions including transfers to controlled corporations, distributions, redemptions, liquidations, acquisitive and divisive reorganizations.

In selecting from over 50 advanced tax courses offered at the Law School each year, students should consider taking courses within the following areas of tax specialization:

- *Business Tax*. In addition to *Corporate Tax I & II*, students planning to work on transactional matters at a corporate law firm or a major accounting firm should enroll in *Partnership Tax* and either *International Taxation I, II and/or III* or *Survey of International Taxation*.
- *Government/Policy*. All students who plan to pursue a career in tax law may benefit from taking one of several tax policy offerings, including the *Tax Policy Colloquium*, *Tax and Social Policy Seminar* and/or the *Federal Budget Policy and Process Seminar*. Students who are interested in serving in government, working at a think tank or pursuing a career in legal academia are strongly encouraged to enroll in one or more of these seminars.
- *Individuals/Non-Profits*. Students who desire to advise individual clients, rather than businesses, should consider enrolling in *Estate and Gift Taxation*, *Tax-Exempt Organizations*, and/or *Tax Aspects of Charitable Giving*.
- *Tax Controversy*. Tax controversy involves the representation of taxpayers, both individuals and businesses, in disputes with the taxing authority (such as the IRS) at the administrative and judicial levels. Students who are drawn more to litigation than transactional work should consider this practice area. Students who are interested in tax controversy should enroll in *Survey of Tax Procedure*, *Tax Procedure*, and/or *Tax Penalties & Prosecutions*.

Find out more about Tax (<https://www.law.nyu.edu/areasofstudy/tax/>) at NYU Law.

Policies

Program Policies

Students who have previously taken law school coursework in tax procedure or participated in a tax clinic may request permission to waive the tax procedure requirement by contacting the program director. If the requirement is waived, students must still complete 24 credits.

LLM students who completed a JD at NYU School of Law may apply a maximum of twelve credits taken in advanced tax coursework during the JD degree toward the degree requirements for the LLM.

Mechanics

Students may only enroll in the Executive LLM on a part-time basis. Part-time students are generally limited to taking six credits per semester, and working attorneys rarely take more than 4 credits in a semester. All graduate tax students must complete a total of 24 credits. Part-time degree candidates, such as those enrolled in the Executive LLM, must complete 20 of these credits in graduate tax courses, including a course in tax procedure. If a student has taken a tax procedure course in law school this requirement may be waived. All students must maintain a B- (2.667) grade point average. On a part-time basis, a student may take up to five years to complete the degree, with most part-time students

finishing their studies in about three years. It is expected that applicants complete a basic federal income tax course before enrolling in the LLM program, though a zero credit online income tax survey course is available.

Exams

Exams aren't usually thought of by prospective students, but they present an important logistical issue. Students in the Executive LLM degree program are currently eligible to take remote exams using Exam4 software and their remote proctoring system. This service allows Executive LLM students to examine in their home or office, subject to video and audio monitoring. The date of each course exam is fixed and cannot be changed except in exigent circumstances, exactly as with our on-campus students. Some adjustments can be made for Executive LLM students in other time zones to avoid early morning or late night testing and so that they can test during our hours of technical support availability.

NYU Policies

University-wide policies can be found on the New York University Policy pages (<https://bulletins.nyu.edu/nyu/policies/>).

School of Law Policies

Additional academic policies can be found on the School of Law academic policies page (<https://bulletins.nyu.edu/graduate/law/academic-policies/>).