

# TAXATION (MSL)

NYSED: 36064 HEGIS: 1499.00 CIP: 22.9999

## Program Description

The Master of Studies in Law (MSL) in Taxation (<https://www.law.nyu.edu/msltax/>) is an entirely online, part-time degree program for accountants and financial professionals. It is specifically designed to enhance the intellectual and professional toolkit of those who advise on the tax aspects of sophisticated business transactions.

In the MSL program, you'll design your own schedule to customize a program of study that best suits your career objectives and organizational needs. You'll study tax as it is taught to law students and practicing tax lawyers and learn from leading faculty whose interests and expertise range from corporate mergers to complex partnership transactions to transfer pricing planning and disputes to tax policy.

## 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/>)

## Licensure

This program is designed for accountants and financial professionals who already hold the relevant credentials and licenses for their field, and who want access to advanced tax law classes to supplement their knowledge.

The MSL in Taxation does not prepare or qualify students for the practice of law, or to sit for any state bar exam, CPA exam, or other professional licensure exam.

## Program Requirements

Students in the MSL program earn their degree by completing either 30 credits or 24 credits (if they have earned a prior master's degree in a related field). Most MSL students have earned a prior master's degree and follow a 24-credit program of study. Up to four credits may be taken in non-tax electives. All MSL students must complete Survey of Tax Procedure.

### Areas of Concentration in Taxation for MSL Students

#### General Taxation

If a student is seeking a general background in taxation and does not yet have plans to practice in a specific area of tax law, we recommend a broad exposure.

Course	Title	Credits
<b>Major Requirements</b>		
LAW-LW 10707	Survey of Tax Procedure	1
LAW-LW 11871	Taxation of Property Transactions	2
LAW-LW 11907	Corporate Tax I	2
LAW-LW 10878	Corporate Tax II	2
LAW-LW 11920	International Tax I	2
LAW-LW 10082	International Tax II	2
LAW-LW 11865	Advanced International Tax: Outbound	2
LAW-LW 11776	Partnership Taxation	3
LAW-LW 11967	Taxation of Executive Compensation	2
LAW-LW 11728	Taxation of Mergers and Acquisitions	2
LAW-LW 10852	Taxation of Private Equity Transactions	2
LAW-LW 10499	Taxation of Financial Instruments	2
Other Elective Credits <sup>1</sup>		2-8
<b>Total Credits</b>		
<b>24-30</b>		

LAW-LW 11776	Partnership Taxation	3
<b>Electives</b>		
Other Elective Credits <sup>1</sup>	8-14	
<b>Total Credits</b>		<b>24-30</b>

<sup>1</sup> Common choices include Timing Issues and the Income Tax, Taxation of Executive Compensation, Estate and Gift Tax, Income Taxation of Trusts and Estates I, a course in Multistate Taxation, Taxation of Private Equity Transactions, or Taxation of Mergers and Acquisitions.

Of course, a student's schedule depends on their background and interests. Students should consider coursework in multistate tax, executive compensation, or estate and gift tax/income tax of trusts and estates. It is possible to enter specialized groups that focus on those areas, though in smaller markets, one may be called upon to handle a broader range of areas than in larger markets where specialization is more common.

#### Business Taxation

Our core business offerings include the following courses: Corporate Taxation I (two credits), Corporate Tax II (two credits), Partnership Taxation (three credits), International Tax I, II, and Advanced International Tax: Outbound (six credits), Taxation of Mergers & Acquisitions (two credits), Taxation of Private Equity Transactions (two credits), Taxation of Financial Instruments (two credits), Taxation of Executive Compensation (two credits).

We also recommend one or both of Taxation of Property Transactions (two credits) and Timing Issues and the Income Tax (two credits) if you have not taken many technical tax courses yet.

Course	Title	Credits
<b>Major Requirements</b>		
LAW-LW 10707	Survey of Tax Procedure	1
LAW-LW 11907	Corporate Tax I	2
LAW-LW 10878	Corporate Tax II	2
LAW-LW 11920	International Tax I	2
LAW-LW 10082	International Tax II	2
LAW-LW 11865	Advanced International Tax: Outbound	2
LAW-LW 11776	Partnership Taxation	3
LAW-LW 11967	Taxation of Executive Compensation	2
LAW-LW 11728	Taxation of Mergers and Acquisitions	2
LAW-LW 10852	Taxation of Private Equity Transactions	2
LAW-LW 10499	Taxation of Financial Instruments	2
Other Elective Credits <sup>1</sup>		2-8
<b>Total Credits</b>		
<b>24-30</b>		

<sup>1</sup> Common choices include Timing Issues and the Income Tax, Estate and Gift Tax, Income Taxation of Trusts and Estates I, or a course in Multistate Taxation.

#### International Taxation

The core of our offerings in international taxation consists of the following courses: International Tax I, II, and Advanced International Tax: Outbound (six credits),

Course	Title	Credits
<b>Major Requirements</b>		
LAW-LW 10707	Survey of Tax Procedure	1
LAW-LW 11920	International Tax I	2
LAW-LW 10082	International Tax II	2
LAW-LW 11865	Advanced International Tax: Outbound	2
LAW-LW 11871	Taxation of Property Transactions	2
LAW-LW 11907	Corporate Tax I	2
LAW-LW 10878	Corporate Tax II	2
LAW-LW 11728	Taxation of Mergers and Acquisitions	2
LAW-LW 11853	Transfer Pricing	1
Other Elective Credits		8-14
<b>Total Credits</b>		<b>24-30</b>

### Estate Planning

The core of our offerings in the estate planning area consists of three courses: Estate & Gift Taxation (three credits), Estate Planning (two credits), and Income Taxation of Trusts & Estates I (two credits).

For those looking to focus exclusively on estate planning, there is still a baseline of general tax coursework that we feel all students should get exposure to: corporate, international, and partnership taxation.

Additional courses include: Tax-exempt Organizations (two credits), Private Foundations and Their Alternatives (one credit), and Tax Aspects of Charitable Giving (one credit). Many practitioners also find state and local tax (SALT) issues to be relevant if their clients don't limit themselves to one US state, so consider the Multistate Tax classes even if you do not plan on specializing in the SALT area.

Course	Title	Credits
<b>Major Requirements</b>		
LAW-LW 10707	Survey of Tax Procedure	1
LAW-LW 11893	Estate and Gift Taxation	2
LAW-LW 10561	Estate Planning	2
LAW-LW 11038	Income Taxation of Trusts and Estates I	2
LAW-LW 11907	Corporate Tax I	2
LAW-LW 10878	Corporate Tax II	2
LAW-LW 11920	International Tax I	2
LAW-LW 11055	Multistate Taxation: Income Taxation	2
LAW-LW 11589	Tax Aspects of Charitable Giving	1-2
LAW-LW 10974	Income Taxation of Trusts & Estates II	2
Other Elective Credits		6-11
<b>Total Credits</b>		<b>24-30</b>

### Final Project

Students complete a final written project that addresses a timely tax law or policy topic.

As with course selection, students have the opportunity to choose a topic based on their area of interest from several different tax subject areas (e.g., business taxation, international taxation, and estate planning or tax controversy). This project offers students an opportunity to apply their learning in a practical and valuable context.

## Sample Plan of Study

This sample plan of study is for a student in the General Taxation concentration who must complete 24 credits. All other concentrations are established in close consultation with an adviser.

Course	Title	Credits
<b>1st Semester/Term</b>		
LAW-LW 10707	Survey of Tax Procedure	1
Elective Course		2
<b>Credits</b>		
<b>2nd Semester/Term</b>		
LAW-LW 11907	Corporate Tax I	2
Elective Course		1-2
<b>Credits</b>		
<b>3rd Semester/Term</b>		
LAW-LW 11871	Taxation of Property Transactions	2
Elective Course		1-2
<b>Credits</b>		
<b>4th Semester/Term</b>		
LAW-LW 11920	International Tax I	2
Elective Course		1-2
<b>Credits</b>		
<b>5th Semester/Term</b>		
LAW-LW 10878	Corporate Tax II	2
Elective Course		1-2
<b>Credits</b>		
<b>6th Semester/Term</b>		
LAW-LW 10082	International Tax II	2
Elective Course		1-2
<b>Credits</b>		
<b>7th Semester/Term</b>		
LAW-LW 11865	Advanced International Tax: Outbound	2
Elective Course		1-2
<b>Credits</b>		
<b>8th Semester/Term</b>		
LAW-LW 11776	Partnership Taxation	3
Final Project		
<b>Credits</b>		
<b>Total Credits</b>		
<b>24-30</b>		

## Learning Outcomes

It is specifically designed to enhance the intellectual and professional toolkit of those who advise on the tax aspects of sophisticated business transactions. This program is designed for accountants and financial professionals who already hold the relevant credentials and licenses

The following learning outcomes apply to the JD (including Dual Degrees), LLM, Advanced Certificate, and Master of Studies in Law (MSL) programs in Taxation:

### 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 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*, which examines the federal income tax treatment of corporations and their shareholders arising from various transactions, including transfers to controlled corporations, distributions, redemptions, liquidations, and 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 Taxation.* In addition to *Corporate Tax*, students planning to work on transactional matters at a corporate law firm or a major accounting firm should enroll in *Partnership Taxation, International Tax I & II, and Advanced International Tax: Outbound*.
- *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 and Public Finance Colloquium*. Students 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

#### Transfer Credit Policy

Students in the MSL program are awarded transfer credit for up to six credits of Master's level coursework in a related field, regardless of whether those credits were already applied to another earned degree. We typically require students to have earned a B or better, if graded on a letter-grade scale. Thus, a student who has already earned an MBA, or a master's degree in accounting, tax, economics, etc. would be able to complete the MSL program in 24 credits rather than 30. In addition to this six credit reduction, the vice dean may consider additional transfer credits (up to four additional credits) of master's level related coursework which was not applied towards another earned degree (e.g., if before or during their MSL a student took two credits of graduate level coursework in a related field that was not applied towards an earned degree, we would consider the grant of transfer credit, subject to the vice dean's approval). MSL students should contact the program director for preapproval of transfer credit before registering for a course at another institution.

#### Grading Policy

MSL sections are graded on a High Pass/Pass/Fail basis. Some employers reimburse students for their tuition, but may require students to show they earned a B grade or better, for example. MSL students should contact the program director to request a letter indicating what the letter grade equivalent would have been for a course. We have found that this has satisfied the requirements of employers for reimbursement.

#### 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/>).