

LAW 7632 Sec. 15545 – Deferred Compensation

Spring 2019

Class Meetings: Monday 4:30 PM – 6:20 PM
Location: HH – 285A
Instructor: Professor Fred Murray
Office Hours: Available most weekdays, except when traveling. Best to send me an email in advance if possible to coordinate a time to get together
Phone: 352-273-0896
E-mail: f.murray@law.ufl.edu

Course Description: This course will provide an overview of the taxation of deferred compensation, both in the qualified and nonqualified context, as well some aspects of the labor law side of the Employee Retirement Income Security Act.

Course Objectives: Students should develop a sound grasp of the basic principles of deferral and of the technical requirements for qualified and nonqualified plans.

Expected Learning Outcomes:

Subject Matter Understanding: By the end of the semester, students should have an understanding of the major components of employee benefits law, focusing on the major areas of taxation, including (for qualified plans) vesting, nondiscrimination, contribution and benefit calculations especially in the §401(k) context, and distributions, as well as some areas of the labor law aspects of ERISA, especially spousal interests.

Students will also learn the major components of nonqualified deferred compensation arrangements for executives, for both cash and stock deferral plans.

In all of these areas, students will gain an understanding of the basic building blocks of the various plans, and most importantly will develop the analytical and research tools to learn additional information in areas we don't have time to cover, in order to serve their future clients' needs.

Skills: Through the use of class discussion of cases and statutes, and of problems requiring careful reading and application of the statutes, regulations and other guidance,

students will develop and practice skills in statutory and regulatory interpretation that are the bedrock skill set of every tax practitioner. Students will also, thru reading and class discussion, further develop their analytical skills to enable them to identify the tax and employee benefit issues presented by clients and accurately apply the law to develop strategies to deal with those issues.

These objectives will be accomplished through:

- Review and study of the relevant authorities, particularly the Internal Revenue Code.
- Discussion of the operation of the processes created by those authorities.
- Working and discussion of hypothetical problems posed by examples.

Course Approach:

There is an ancient Chinese proverb attributed to Confucius (551–479 BCE) that is roughly translated: *“Teachers open doors, but you must enter by yourself.”* I will do my best to help you succeed, to provide you with knowledge, at least at an overarching level that is high enough that we may fit it in the time we have together but sufficient to give you the framework and principles that guide further scrutiny and action. But, as in any work setting, you must accept that knowledge and apply the necessary effort to fully comprehend it and then to apply it.

The final exam will test your grasp of what we do together in class. We will discuss that in the first class, and in a Review session in the last class.

Class Preparation and Participation: Come to class having completed the assignments to the best of your ability and prepared to discuss the assignment.

Students should expect to spend, on average, approximately two hours preparing for every hour of class. Reading assignments are posted on the “Modules” link on the Canvas site (located on the left side of the Canvas site). It is anticipated that you will spend approximately 2 hours out of class reading and/or preparing for in class assignments for every 1 hour in class. ABA Standard 310 requires that students devote 120 minutes to out-of-class preparation for every “classroom hour” of in-class instruction. (Course) has 3 “classroom hours” of in-class instruction each week, requiring at least 6 hours of preparation outside of class. Accordingly, you will have about 60 pages of reading each week. Because the course includes statutory and regulatory excerpts that require careful reading, as well as discussion problems that require thoughtful advance written preparation, you should spend at least one hour on every 10-15 pages of reading.

Participation is important to you, your classmates, and your professor. Below-average participation means no contributions to class and/or comments that detract from the discussion; average participation includes comments that contribute positively to the discussion; above-average participation means comments that contribute positively to the discussion and display some insight, analysis, creativity, and/or synthesis; and excellent

participation means comments that contribute positively to the discussion and display significant insight, analysis, creativity, and/or synthesis.

Repeated lack of preparedness may be counted as an unexcused absence. Repeated class disruption (e.g., excessive noise, texting, personal internet use, arriving late, leaving early) may be counted as an unexcused absence. You will be notified each time you accrue an unexcused absence on account of lack of preparedness and/or disruptive behavior.

If you are absent because of a special situation (religious holiday, sickness, family emergency, job interview, etc.), the absence **may** be excused at Prof. Murray's discretion after you have provided any documentation of the situation requested by Prof. Murray and you have completed a make-up assignment, if requested. If you are dealing with a personal situation of high difficulty and prolonged duration, please seek assistance from Student Affairs as soon as possible.

If you have more than two unexcused absences from regularly scheduled classes, your participation grade will be 0, and further more than 2 unexcused absences will result in a half a grade reduction in your final grade.

Course Structure:

The course will be divided into modules of material, some of which may be discussed in more or less than one class.

Grades:

There will be a 4-hour take home final exam that will be open to Limited Materials (see discussion below). We will discuss the permissible materials in class. The format of the exam will be essay and problems. Your grade will be based approximately 80% on the final exam and 20% on attendance and class participation.

The final examination will be four hours in length, and will consist of three essay-type questions. Each of the questions will be weighted equally for grading purposes. Each question will include a statement of facts followed by some specific questions based on the facts. I will expect you to answer each question and provide a summary of what you considered in reaching your answer. I do not want an essay addressing everything you know about what you think the subject of the question is. I will give you credit for your answer only if it correctly relates the facts to the law in reaching the answer.

Questions from previous final examinations will not be available for your review. You must turn in your final examination questions along with your answers when you are done.

The Exam instructions will state:

This is an OPEN book exam. Users are permitted to access other documents, outlines, notes, files, etc. on their hard drives, or other materials in their possession. iPads, e-readers and other electronic devices that store information may be used. Calculators may be used.

Notwithstanding the foregoing, students may not access the Internet, except as necessary to use the Online Exam Management System, during the examination and to submit their examination. Doing so is a disciplinary violation of the Honor Code. Students may not consult one another or any other person by computer or other electronic device or otherwise, and may not consult any materials not specifically permitted.

The final exam will be given as a take-home examination during the examination period specified by the College of Law.

Grade Scale & Grading Policies:

| <u>Grade</u> | <u>Points</u> |
|------------------|---------------|
| A (Excellent) | 4.0 |
| A- | 3.67 |
| B+ | 3.33 |
| B (Good) | 3.00 |
| B- | 2.67 |
| C+ | 2.33 |
| C (Satisfactory) | 2.00 |
| C- | 1.67 |
| D+ | 1.33 |
| D (Poor) | 1.00 |
| D- | 0.67 |
| E (Failure) | 0.00 |

The law school grading policy is available at <http://www.law.ufl.edu/student-affairs/current-students/academic-policies#9>. **Note that the mandatory mean does not apply to LL.M. students.**

Required Course Materials:

All students must have access to the United States *Internal Revenue Code of 1986*, and the relevant *Income Tax Regulations*. (Note that this information also is available via the web using the RIA, CCH, or LEXIS Tax Research Services.)

Kathryn Kennedy, Employee Benefits Law: Qualification and ERISA Requirements, Carolina Academic Press, 3rd Edition.

Materials (PowerPoint Decks, cases, rulings, and other interpretive material) will be supplied for particular topics by the professor. These readings (including current event course related items), lecture slides, cases, and other handouts are available from the Canvas course web page with postings announced via the class email list.

Materials not marked as “Skim” or “Helpful Supplementary Reading” in the Reading Assignments set forth below are required reading.

Class Web Page:

The course materials are in the UF Canvas E-Learning system. You will need your GATORLINK USERID and PASSWORD to access the course information. If you don't have a GatorLink account, create your GatorLink account at gatorlink.ufl.edu.

Web-based Information Resources:

All students in the course have access to several electronic tax research libraries. These include Tax Analysts Tax Notes, CCH Tax Research Library, RIA Checkpoint Tax Research Service, LEXIS/NEXIS, and BNA Tax Management Portfolios. Although there is substantial overlap across these services, all provide useful and unique research tools, including complete versions of tax research services (commentary and explanation), Code, regulations, court cases, rulings, tax treaties, etc. You may access these libraries from anywhere you can access the internet. Both LEXIS/NEXIS and CCH require no password as long as you access the database via a UF computer account. There are several methods (e.g., proxy server or VPN) for making your computer think it is linked to a UF sever via a few special commands; if you need this information, see “<http://web.uflib.ufl.edu/ufproxy.html>” or the class web site.

Proxy info: <https://www.law.ufl.edu/library/library-information/remote-access>

For Checkpoint: Register on campus at <http://www.checkpoint-registration.riag.com/schools> (need to register on campus; use off campus through VPN)

For Tax Analyst: Register at <http://www.taxnotes.com> (need to register on campus; use off campus through VPN)

For Bloomberg (BNA): Register at <https://essential.bna.com/login/signin?msg=deny&url=https%3A%2F%2Fwsauth.bna.com%2Fwsauth%2Fblawauth%3Ftarget%3Dhttps%3A%2F%2Fwww.bloomberglaw.com%2Fstart&lddy=-518&pcv=> (can use off campus without going through VPN)

Note that these accounts last approximately a year and you may already have a valid account from a prior signup. For problems, see Sarah Lewis in the library or at slewis@law.ufl.edu.

Class Policies:

All University of Florida and Levin College of Law rules apply. Particularly note University policies regarding software use and the honor code.

READING ASSIGNMENTS

The attached assignment sheet lists the chapter in the textbook and additional materials that will be covered during each class. The textbook (at the beginning of each chapter), and in some cases the assignment sheet, list other resource materials. I strongly suggest that you study the assigned chapter and the resource materials very carefully before each class. I may also assign other materials that should be studied as well.

Each chapter has problems at the end of the chapter. The assignment sheet lists the problems that will be covered in each class. You should be prepared to discuss the problems in class. We will spend substantial time in class discussing these and hypothetical problems that I will present in class.

I expect you to be prepared and to participate in the discussion. I will call on students to join in the discussion and encourage you to ask questions. I strongly recommend that you attend all classes and pay careful attention to the discussion. The assigned problems are typical of the problems that will be on the final examination.

You should bring to class whatever you will need to discuss the assignment for that day. I strongly suggest that you also bring the Internal Revenue Code and Treasury Regulations, or copies of the provisions that we will be studying that day. You may not record any class.

| Class | Date | |
|-------|-------|---|
| | | <p>I. Background and Basic Principles (Classes One and Two)</p> <p>Origins and Fundamentals of the US Pension and Retirement System (including Social Security and private sources of retirement income)</p> <p>Basics of Tax Deferral and Timing</p> <p>Typology of Retirement Plans – Defined Benefit and Defined Contribution Plans</p> <p>Origins of ERISA</p> |
| 1 | Jan 7 | <p>For the first class read the Halperin article on Employer-Based Retirement Income, and the JCT Enron report materials (2 items) both available on the web site (this is just for background, so you can skim it).</p> <p>We will discuss the context of executive deferred compensation against the backdrop of plans available to rank and file employees during the first class, using the Enron plans as a case study in the ethics of advising clients on deferred compensation arrangements. We will then start discussing the basics of deferral - in the Unit 1 Reading Materials, read pp. 3-38 - the JCT description of nonqualified deferred comp (again, this is for background, so you can skim it), the posted rulings, especially Rev. Rul. 60-31, which we will spend quite a bit of time on, and the first</p> |

| Class | Date | |
|-------|--------|--|
| | | <p>Albertsons’ 9th Circuit decision - also review the Code and Regulation sections cited in Rev. Rul. 60-31. There are no problems for the first class.</p> <p>READING:</p> <p>Skim Chapter 1 of text (background); Read carefully Chapter 2 of text – we won’t do the text problems in class.</p> <p>Read the first two rulings in the supplemental course materials posted at the course web site and use the rest of the materials as sources for authority to answer the first 2 problems in those materials.</p> <p>Code and Reg Assignment: Basics of Deferral: Code: §§451; 83(a), (h); 402(b)(1), (3); 403(c); 404(a)(1)(A), (a)(3), (a)(4), (a)(5) Regs: §§1.83-3(a), -3(c), -3(e); -6(a) §§1.402(b)-1(b)(1) §§1.404(a)-1(c), -12(a), (b)(1) and (2); §1.404(b)-1T Q&A 1&2; 1.404(d)-1T §§1.451-1(a), -2(a), (b)</p> <p>Basics of Qualified Plans Code: §§ 401(a)(1), (2), (3), (4), (5), (7), (8), (9), (11), (13), (14), (16), (17), (26), (27); §72(t)(1), (2)(A); §4975((a),(b),(c), (e)(2) Regs: §§ 1.401-1; 1.401-2</p> |
| 2 | Jan 14 | <p>We will continue on the material previously assigned, finishing the rulings up to the Minor case, and then looking at Minor and Albertsons. We will finish the Unit One materials by doing Problems I-1 through I-4. These problems involve all most of the remaining materials in Unit One, so do a close reading of the rulings in developing your answers. For our purposes at the moment, ignore the existence of Section 409A, as we want to lay the foundation for examining that by looking at what the law required prior to the passage of 409A.</p> |
| | | <p>II. Tax Treatment of Qualified Pension and Profit Sharing Plans; Selected ERISA Based Plan Requirements (Classes Three – Nine)</p> <ul style="list-style-type: none"> A. Definitions; Qualification Rules and Agency Administration B. Minimum Age and Service Rules C. Vesting D. Nondiscrimination in Coverage E. Nondiscrimination in Benefits and Allocations H Deductibility of Employer Contributions I. Distributions Overview |
| 3 | Jan 28 | Age and service rules. |

| Class | Date | |
|-------|--------|--|
| | | <p>READING:</p> <p>Additional material is posted in the Course Documents folder - please read Rev. Rul. 80-360 carefully before tackling the problems. Read Chapter 3 in the textbook and look at the problems.</p> <p>Code: section 410(a) Regs: sections 1.410(a)-1, -3, -3T, -4, -5; -8T</p> |
| 4 | Feb 4 | <p>Vesting and Accrual</p> <p>READING:</p> <p>Materials in the Course Documents Folder; Casebook - Chapter 5.</p> <p>Code: Sections 411(a)(1)-(3)(A), (G); (4); (5)(A); (6)(A), (E); (7)(A), (8) - (11)(A); Sections 411(b)(1)(A), (C) (skim this); (2)(A); (3); (4)(A) & (C); Sections 411(c)(1); (2)(A); 411(d)(1), (6)(A), (B); 414(q), (s); 415(c)(3) Regs: Read carefully Sections 1.411(a)-7(d); 411(c)-1; Sections 1.411(a) -3T (a), (c), (f); -4T; 1.411(b) - 1(b) (skim)</p> |
| 5 | Feb 11 | <p>Coverage nondiscrimination.</p> <p>READING:</p> <p>Read Chapter 4 of the book, but concentrate on the Code and regs.</p> <p>Code: Sections 410(b); 401(a)(26)(A), (B); 414(q) Regs: Sections 1.410(b) -2(a), (b); 1.410(b)-3(a)(1), 1.410(b) -4(a), (b), (c); 1.410(b) -5(a), (b), (c), (d)(4), (d)(5)(i), 1.410(b) -6(a), (b)(1), (c), (d)(1), (d)(2)(i), (f); 1.410(b)-7(a), (c)(3); 1.410(b) -8(a); 1.410(b) -9</p> <p>For our problem in this area, read Rev Rul 83-58 (in the Course Documents folder) and determine how to apply section 410(b) Code and regs to determine if the plan would meet the current coverage nondiscrimination requirements. Assume, for this purpose, that the 4 most highly compensated employees are highly compensated as defined in Section 414(q). Also assume that each employee is allocated 10% of pay in the profit-sharing plan's allocation formula. We will be walking through this step by step in class, so you don't need to have it completely prepared ahead of time - but spend some time looking at the Code and regs to see if you can outline a structure.</p> |
| 6 | Feb 18 | <p>Benefit Nondiscrimination</p> <p>We will continue and finish the coverage nondiscrimination discussion applying current law and regs to the facts of Rev Rul 83-58. We will then turn to benefit nondiscrimination - read the material in the book on 401(a)(4), but we will concentrate on the regulations in doing the benefit nondiscrimination problem I have placed in the Course Documents folder.</p> <p>READING:</p> <p>Chapter 8 in the book.</p> |

| Class | Date | |
|-------|--------|---|
| | | <p>Code: Secs 401(a)(4) Regs: Secs 1.401(a)(4)-1(a),-1(b)(1), (2)(i),(ii(A),(3),(4) -1(c)(1), (2), (3), (4), (8), (10), (11) 1.401(a)(4) -2 (except skip 2(b)(2)(ii), and 2(b)(4)(vi)). 1.401(a)(4) -4(a), (b), (c), (e) 1.401(a)(4) -5(a)(1), (4) Examples 1-5 1.401(a)(4) -9(a) 1.401(a)(4) -12 Definitions as you need them in the other assigned reg sections.</p> |
| 7 | Feb 25 | <p>Aggregation rules and Separate Lines of Business</p> <p>We will now discuss aggregated employers and plans, including the affiliated service group rules and the problems including Problem 3. We will also discuss the family attribution rules, and in that regard, in Problem 2, see if it would make a difference if Alice were married to Charles and Betty were married to Dan. We will then move on to the separate line of business material - there is no additional problem, but use the facts in problem 2 and decide what facts you would need to know about each employer to determine whether the SLOB regulations might assist each in passing the nondiscrimination rules. I will cover permitted disparity, AKA integration with Social Security, limits on contributions and benefits, mainly section 415, and the top-heavy rules.</p> <p>READING:</p> <p>Chapter 11 of the text.</p> <p>Code: §414(r) Regs: 1.414(r)-0 (including flow chart), -1(a), (b), (c)(1), -2(a), (b)(2)(i), -3(a), (b), -4, -5(a), (b), (c).</p> |
| 8 | Mar 11 | <p>We will finish our discussion of aggregated employers and plans, including the affiliated service group rules, and do the problems, including going over aggregation problem 2 to determine whether the plans will satisfy the coverage nondiscrimination tests of 410(b). We will then move on to the separate line of business material previously assigned - there is no additional problem, but use the facts in problem 2 and decide what facts you would need to know about each employer to determine whether the SLOB regulations might assist each in passing the nondiscrimination rules. We will cover permitted disparity, AKA integration with Social Security, limits on contributions and benefits, mainly section 415, and skim the top-heavy rules.</p> |
| 9 | Mar 18 | <p>ERISA Fiduciary rules and Prohibited Transactions</p> <p>READING:</p> <p>Chapter 18 of the text.</p> |
| | | <p>III. Employer-Sponsored Tax Favored Savings Plans – 401(k) (Classes Ten and Eleven)</p> |

| Class | Date | |
|-------|--------|---|
| 10 | Mar 25 | <p>We will then turn to CODA's under 401(k) and (m) and IRAs, including Roth IRA's and conversion issues. I have placed, in addition to the problems, three sets of readings in the Course Documents folder - Part A General 401(k) and 401(m) reading, Part B on 401(k) safe harbor rules, and Part C 401(k) SIMPLE plans. Read all of this generally, and then go back if you need specific guidance when doing the problems. We will do IRAs after 401(k) and (m).</p> <p>READING:</p> <p>CODA's are covered in Chapter 17 of the book. We will do at least the first problem for 401(k) and 401(m) and possibly the second as well.</p> <p>Code: Sections 401(k), 401(m) Regs: Be sure to note the pre-2006 and post-2006 rules - we will concentrate on the post-2006 effective regs: Reg 1.401(k)-0; 1.401(k)-1, -2(a),(b),-3(a),(b),(c), -4, -6</p> <p>The same goes for pre- and post-2006 401(m) regs - be sure you use the new sections for the problems. Reg 1.401(m)-1, -2(a),(b), -3(a)-(d), -5</p> |
| 11 | Apr 1 | <p>Distributions and IRAs (including anti-alienation)</p> <p>After reviewing the IRA material and assigned problems, we will restart distributions, including vehicles for receipt of distributions, principally IRAs. Some changes in these areas, not terribly significant, were made by the Pension Protection Act of 2006, so be sure to check materials on the PPA that are included in the Course Documents folder for descriptions of changes in some of the distribution rules. We will do the problems that are in the Course Documents folder.</p> <p>READING:</p> <p>Materials: Distributions reading materials – Chapter 14 of the text</p> <p>Code: §§ 72(a), (b), (c), (d), (e), (m), (o), (p), (q), (s), (t); 219; 401(a)(9); 402(a), (b), (c), (d), (e)(3),(4)(A),(B),(C),(D), (6), (f); 408; 408A 3405; 4975(c)(1),(3), (d)(1), (e)(1), (2), (3), (f)(6)(A) Regs: §§ 1.402(c)-2 Q&A's 1, 2, 3, 4, 7, 11, 12; 1.408-1. -2, -4, -8; 1.408A -1, -2, -3.</p> <p>Code: §§ 414(p), 401(a)(11), (13). Regs: §§1.401-1(b)(1)(i), (ii);1.401(a)-11; 1.401(a)-13</p> <p>Also read Code Sections 408 and 408A and their accompanying regs, particularly those sections referenced in the book. We will touch on IRA's primarily as rollover destinations.</p> |
| | | <p>I am not going to hold you responsible for IRA's, other than as rollover vehicles, on the exam. I have added materials on IRA's and estate planning issues connected to qualified plans in the Course Documents folder, but those are solely for your use if you're interested - they will not be covered on the exam.</p> |
| | | |

| Class | Date | |
|-------|--------|--|
| | | <p>IV. Nonqualified Deferred Compensation (Classes Twelve through Thirteen)</p> <p>A. Cash Nonqualified Deferred Compensation – Rabbi Trusts, etc. B. Stock Based Deferred Compensation C. Section 409A</p> |
| 12 | Apr 8 | <p>We will discuss cash NQDC before passage of 409A, using the problems as a basis for discussion. We will then turn to section 409A in the cash NQDC context, and apply it to the problems to see if any different results are obtained under 409A, as well as doing the last 3 problems which are specific to 409A. Be sure to read the 2016 regulations.</p> <p>READING:</p> <p>Reg sections: 1.409A-1 Definitions (a)(1), (2), (3),(5); 1(b)(1),(2), (3), (4), (8); (c)(1), (3); (d)(1), (3); (e)(1), (2); (f)(1), (2); (g); (h)(1); 1.409A-2 Deferral elections (a)(1)-(7), (12); (b)(1), (2)(i), (iii); (9) Examples 1, 2, 3, 5, 6, 7, 8, 9, 10, 1.409A -3 Permissible payments (a), (b), (f), (g)(1), (i)(1)(i) 1.409A-6 Statutory effective dates (a)(1), (4)(i)</p> |
| 13 | Apr 15 | <p>This week we discuss stock as compensation - Restricted Stock, Stock Options and other varieties of stock arrangements, doing all problems. We'll discuss the Martin cases in particular, as well as reviewing Minor, and the rest of the rulings assigned. We will continue looking at section 409A, which was enacted in 2004, taking effect in 2005 and later (although that was delayed by the IRS while they were drafting regulations). Finish reading the materials, which include a couple of articles discussing 409A, and in doing the problems, consider what your answer would be before enactment of 409A and after.</p> <p>READING:</p> <p>Please review the 409A materials already provided focusing on discussions of how 409A has affected stock options, SARs, etc.</p> <p>Code and Regs: IRC Section 83 and accompanying regulations; section 409A and regulations addressing compensatory stock arrangements.</p> |
| | | <p>V. Miscellaneous Issues</p> |
| 14 | Apr 22 | <p>Miscellaneous issues (including selected international issues such as use of tax treaties)</p> <p>See materials in the Course Document Folder on the course site.</p> |

Syllabus Addendum

Attendance: Although attendance may not be taken at every class, students are expected to attend and participate in every class. Students should prepare for all classes even if they miss and are responsible for material covered in their absence. Students may not attend a class unless they are officially registered for the course. The Levin College of Law does not approve requests to audit its courses. Students who do not attend at least one of the first two class meetings of a course or laboratory in which they are registered, and who have not contacted the School to indicate their intent, may be dropped from the course. The instructor adheres to all UF attendance policies.

Honesty: Academic dishonesty will not be tolerated. Students are required to know and comply with the university's policy on academic honesty. Academic honesty and integrity are fundamental values of the University community. Students should be sure that they understand the UF Student Honor Code at <http://www.dso.ufl.edu/students.php>.

Civility: This course will be conducted in a courteous and professional manner. Inappropriate classroom behavior of any form will not be tolerated. At the instructor's discretion, students acting in an uncivil manner will receive a grade reduction commensurate with the infraction. Students can be withdrawn from the course for excessive unacceptable behavior.

Disabilities: The University of Florida is committed to providing academic accommodations for students with disabilities. Students with disabilities requesting accommodations should first register with the Disability Resource Center (352-392-8565, www.dso.ufl.edu/drc/) by providing appropriate documentation. Once registered, the Dean of Students Office will provide documentation to the student who must then provide this documentation to Dean Rachel Inman when requesting accommodation. You must submit this documentation prior to submitting assignments or taking the quizzes or exams. Accommodations are not retroactive, therefore, students should contact the office as soon as possible in the term for which they are seeking accommodations.

If your accommodation regards special testing arrangements, you must then submit an Accommodated Test Request (ATR) online for each exam/quiz. Students with disabilities are encouraged to follow these procedures as early as possible within the semester. If you do not follow the Disability Resource Center procedures or meet the deadline for requesting accommodations or for submitting your ATRs, you will have to take the exam with your class without accommodations.

Evaluation: Students are expected to provide feedback on the quality of instruction in this course based on 10 criteria. These evaluations are conducted online at <https://evaluations.ufl.edu>. Students will be given specific times when they are open. Summary results of these assessments are available to students at <https://evaluations.ufl.edu/results/>.