

## Table of Contents

<b>Introduction</b> . . . . .	<b>5</b>
<b>Chapter 1. Selected Issues in Regard to CIT</b> . . . . .	<b>9</b>
1. General remarks . . . . .	9
2. Higher education institutions as CIT payers . . . . .	10
3. Statutory operation of higher education institutions . . . . .	11
4. HEI investments in special purpose vehicles and investment funds . . . . .	15
5. Compensation amounts, statutory interest and litigation costs . . . . .	19
6. Financing the operation of HEIs via bank financial instruments . . . . .	20
7. Managing HEI-owned immovable property . . . . .	21
8. Managing the immovable property of a church institution of higher education . . . . .	27
9. Taxation of research and development activity . . . . .	29
9.1 The concept of R&D . . . . .	29
9.2 The idea of tax relief . . . . .	34
9.3 Payroll expenses . . . . .	36
9.4 Materials and raw materials directly related to R&D . . . . .	41
9.5 Opinions and consultancy services . . . . .	41
9.6 Paid use of scientific and research equipment . . . . .	44
9.7 Acquisition of a patent and a protection right used for R&D activity . . . . .	45
9.8 Depreciation write-offs . . . . .	46
9.9 The status of an R&D centre . . . . .	46
9.10 Exclusions in the catalogue of entities conducting R&D activities . . . . .	50
10. Concluding remarks . . . . .	53
<b>Bibliography</b> . . . . .	<b>54</b>

<b>Chapter 2. Selected Issues in Regard to PIT</b> . . . . .	<b>61</b>
1. General remarks . . . . .	61
2. Tax exemptions . . . . .	62
2.1 The catalogue of exemptions and definition problems . . . . .	62
2.2 Scholarships and lump sums related to a temporary stay abroad . . . . .	68
2.3 Scholarships and financial aid awarded under the Act 2.0 and scholarships granted as part of the State's science policy . . . . .	72
2.4 Scholarships and other funding under the NAWA Act . . . . .	79
2.5 Scholarships awarded by PAN scientific institutes and research institutes; the scholarship of the president of the Polish Academy of Sciences . . . . .	80
2.6 Fulbright scholarships and other benefits . . . . .	82
2.7 Scholarships for students awarded by local government units and public benefit organizations . . . . .	84
2.8 The 'Mobility Plus' programme . . . . .	85
3. Preferential 50% tax-deductible costs for academic teachers . . . . .	89
3.1 New regulation by the Act 2.0 . . . . .	89
3.2 Creative activity in light of the Copyright Law . . . . .	90
3.3 Responsibilities of academic teachers . . . . .	93
3.4 The Finance Minister's general interpretation . . . . .	96
4. Taxation of research and development activities . . . . .	98
5. Concluding remarks . . . . .	104
Bibliography . . . . .	105
<b>Chapter 3. Selected Issues in Regard to VAT</b> . . . . .	<b>111</b>
1. General remarks . . . . .	111
2. The tax law status of higher education institutions . . . . .	114
3. HEI as a VAT payer and an autonomous definition of economic activity . . . . .	117
4. Education services and VAT exemption . . . . .	120
5. Conferences and trainings . . . . .	125
6. Admissions to studies . . . . .	128
7. The HEI's profile versus exemption . . . . .	129
8. Artistic activities and museums, libraries and academic publishing offices . . . . .	131
9. Halls of residence . . . . .	137
10. Payment of social benefits to HEI employees . . . . .	138
11. Concluding remarks . . . . .	141
Bibliography . . . . .	143
<b>Conclusion</b> . . . . .	<b>147</b>