RSTP NMTRI

JOINT COMMITTEE ON TAXATION November 17, 2017 JCX-59-17

ESTIMATED REVENUE EFFECTS OF THE "TAX CUTS AND JOBS ACT," AS ORDERED REPORTED BY THE COMMITTEE ON FINANCE ON NOVEMBER 16, 2017

Fiscal Years 2018 - 2027

[Billions of Dollars]

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
I. Tax Reform for Individuals													
 A. Simplification and Reform of Rates, Standard Deductions, and Exemptions 													
1. 10%, 12%, 22%, 24%, 32%, 35%, and 38.5% income													
tax rate brackets (sunset 12/31/25) [1][2]	tyba 12/31/17	-89.8	-130.9	-136.3	-141.7	-147.1	-153.1	-159.0	-165.5	-50.3	[3]	-645.8	-1,173.8
2. Modify standard deduction (\$12,000 for singles, \$24,000									10010	50.5	[5]	043.0	-1,175.0
for married filing jointly, \$18,000 for HoH) (sunset													
12/31/25) [2]	tyba 12/31/17	-58.3	-84.1	-86.6	-89.7	-92.6	-95.1	-98.1	-101.6	-30.8	[3]	-411.2	-736.9
3. Repeal of deduction for personal exemptions (sunset				a 1400 m									
12/31/25) [2]	tyba 12/31/17	93.9	138.1	142.5	147.4	153	158.8	164.6	170.5	51.7		675.0	1,220.6
B. Treatment of Business Income of Individuals	tyba 12/31/17	0.8	2.2	5.5	8.3	10.4	12.9	16.7	20.1	25.6	31.5	27.2	134.0
1. Allow 17.4% deduction of certain domestic non-service													
passthrough income of individuals, capped at 50 percent of													
taxpayer's share of total wages paid by the business.													
Exceptions (1) allow the deduction for service passthrough													
income for individuals below taxable income threshold,													
and (2) provide the wage cap does not apply for individuals													
below taxable income threshold. Threshold is taxable													
income below \$500,000 for joint filers, \$250,000 for all													
other individuals, phased out over next \$100,000 for joint filers and \$50,000 for all others (sunset 12/31/25) [4]	. 1 10/01/17	24.5	41.6	10.0									
2. Disallow active pass-through losses in excess of \$500,000	tyba 12/31/17	-24.5	-41.6	-43.9	-45.3	-46.1	-45.1	-46.1	-44.5	-22.0	-3.1	-201.3	-362.2
for joint filers, \$250,000 for all others (sunset 12/31/25)	tyba 12/31/17	10.2	16.5	16.6	17.2	17.0	10.0	10.0	10.5	5.0			
C. Reform of the Child Tax Credit	tyba 12/31/17	10.2	10.5	10.0	17.2	17.8	18.2	18.8	19.5	5.9	-3.5	78.4	137.4
1. Modification of child tax credit: \$2,000 not indexed;													
refundable up to \$1,000 indexed up to nearest \$100 base													
year 2017; \$2,500 refundability threshold not indexed;													
\$500 other dependents not indexed; phase outs													
\$500K/\$500K not indexed; increase to less than 18 years			100000										
old (sunset 12/31/25) [2]	tyba 12/31/17	-31.9	-68.0	-69.7	-71.0	-72.3	-75.6	-77.0	-78.1	-40.6		-313.0	-584.3

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
Require valid Social Security number of each child to claim refundable portion of child credit (otherwise \$500 dependent credit) (sunset 12/31/25) [2]	tyba 12/31/17		3.2	3.0	2.9	2.9	2.9	2.9	2.8	2.8	0.5	12.0	23.9
accrued in a trade or business, interest on home equity debt, non-disaster casualty losses, tax preparation expenses, and certain miscellaneous expenses (sunset 12/31/25) [2]	tyba 12/31/17	58.6	104.9	109.1	115.5	121.9	128.7	136.1	143.6	59.2		510.1	977.7
of cash to public charities (sunset 12/31/25)	cmi tyba 12/31/17 -					Estimo	ate Include	ed in Item	I.D.1				
3. Repeal of overall limitation on itemized deductions	tyba 12/31/17					Estimo	ate Include	ed in Item	I.D.1				
(sunset 12/31/25)	tyba 12/31/17												
residence (sunset 12/31/25)	saea 12/31/17	[5]	0.1	0.1	0.1	0.1	0.1	0.1	0.1	[5]		0.4	0.8
5. Repeal exclusion for employer-provided bicycle commuter fringe benefit (sunset 12/31/25)6. Repeal exclusion for employer-provided qualified	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]		[5]	[5]
moving expense reimbursements (sunset 12/31/25) [6][7]	tyba 12/31/17	0.4	0.6	0.6	0.6	0.6	0.6	0.6	0.7	0.2		2.7	4.8
7. Repeal of deduction for moving expenses (other than members of the Armed Forces) (sunset													7.0
12/31/25)	tyba 12/31/17	0.6	0.8	0.9	0.9	1.0	1.0 [5]	1.1 [5]	1.1 [5]	0.3 [5]		4.2 0.1	7.6 0.1
8. Modification to wagering losses (sunset 12/31/25)	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[3]	[5]	[2]	[2]		0.1	0.1
E. Double Estate, Gift and GST Tax Exemption Amount (sunset 12/31/25)	dda & gma 12/31/17	-1.2	-8.1	-8.8	-9.1	-9.6	-10.1	-10.7	-11.1	-11.0	-3.3	-36.8	-83.0
F. Repeal of Alternative Minimum Tax on Individuals (sunset 12/31/25)	tyba 12/31/17	-8.0	-97.2	-85.4	-90.0	-95.0	-99.5	-104.4	-110.0	-79.7	[3]	-375.6	-769.
G. Reduce ACA Individual Shared Responsibility Payment Amount to Zero [2][8][9]	pdtnc ba cy 2018		6.5	10.2	28.8	37.5	41.2	44.1	46.8	50.1	53.2	83.0	318.4
 H Other Provisions 1. Allow for increased contributions to ABLE accounts; allow saver's credit for ABLE contributions (sunset 			503	.	[2]	[2]	[2]	[3]	[3]	[3]	[3]	[3]	[3
12/31/25)	tyba 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	[5]	[5]	[2]	[2]	[2]	Ľ
Allow rollovers from 529 accounts to ABLE accounts (sunset 12/31/25)	da 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]		
3. Extend time limit for contesting IRS levy (sunset 12/31/25)	[10]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3
4. Individuals held harmless on improper levy on						N	egligible F	Revenue Ei	ffect				
retirement plans (sunset 12/31/25)	laaitrtia 12/31/17						egngiote i	10 / 0/1110 25	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				
5. Treatment of certain individuals performing services in the Sinai Peninsula of Egypt (sunset 12/31/25)	spo/a 6/9/15	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]		. [3]	[:
6. Modification of user fees for installment agreements (sunset 12/31/25)	F113	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[:

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
7. Extend the limitations period with respect to excluding													
amounts received by wrongfully incarcerated individuals (sunset 12/31/25)	. DOE	[2]											
Treatment of student loans discharged on account of		[3]										[3]	[3]
death or disability (sunset 12/31/25)	doia 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1
12/31/25)	tyba 12/31/17	[3]	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.1		-0.8	-1.5
Simplified filing requirements for individuals over 65 years of age (sunset 12/31/25)	. tyba DOE -						- No Reve	E.C					
 Sense of the Senate to improve customer service and protections for taxpayers by reinstating appropriate IRS 	.,						- No Keve	пие Едјесі					
funding levels (sunset 12/31/25)	DOE -						- No Reve	nua Effact					
12. Return preparation programs for low-income taxpayers (sunset 12/31/25)													
13. Codify and permanently extend the Free File Program	DOE -						- No Reve	nue Effect					
14. Allow 529 contributions for the in utero (sunset 12/31/25)	DOE -							nue Effect					
15. Mississippi River Delta flooding relief (sunset		[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1
12/31/25) [12]	DOE	-0.3	[3]	[5]	[5]	[3]	[3]	[3]	[3]	[3]	[3]	-0.5	-0.5
12/31/25)	facii tyba 12/31/17	[3]	[2]	[2]	[2]	F27	F0.7	503					
17. Clarification of IRS whistleblower awards [2]	[13]	[3]	[3] [3]	[3] [3]	[3] [3]	[3] [3]	[3] [3]	[3] [3]	[3] [3]	[3] [3]	[3]	-0.1 [3]	-0.1 -0.1
Total of Tax Reform for Individuals		-49.5	-157.2	-142.4	-125.3	-117.7	-114.3	-110.5	-105.8	-38.7	75.3	-592.0	-886.4
II. Business Tax Reform													
A. Tax Rates													
1. 20% corporate tax rate in 2019 and thereafter	tyba 12/31/18	-15.2	-99.0	-138.6	-141.9	-143.2	-147.7	-152.5	-157.0	-163.1	-171.0	-537.9	1 200 0
Reduction of dividends received deduction percentages	tyba 12/31/18		0.4	0.5	0.5	0.6	0.6	0.6	0.6	0.6	0.7	-337.9	-1,329.2
3. Zero percent dividends paid deduction and reporting						15.5.5	0.0	0.0	0.0	0.0	0.7	2.0	5.1
penalty	tyba 12/31/18 -					Ne	egligible R	evenue Efi	ect				
B. Repeal of Alternative Minimum Tax on Corporations [2]	tyba 12/31/17	-15.3	-8.3	-4.5	-4.7	-1.3	-1.3	-1.3	-1.3	-1.2	-1.1	-34.0	-40.3
C. Small Business Reforms								1.0	1.5	1.2	-1.1	-34.0	-40.3
1. Increase section 179 expensing to \$1 million with a													
phaseout range beginning at \$2.5 million and expand													-
definition of qualified property	ppisi tyba 12/31/17	-3.5	-6.3	-4.3	-2.6	-2.0	-1.5	-1.1	-0.9	-0.9	-0.8	-18.8	-24.0
2. Simplified accounting for small business	[14]	-8.7	-6.9	-2.6	-1.6	-1.3	-1.2	-1.2	-1.3	-1.4	-1.4	-21.1	-27.6
D. Cost Recovery, etc.											1.1	21.1	-27.0
1. Limit net interest deductions to 30% of adjusted													
taxable income, carryforward of denied deduction	tyba 12/31/17	24.6	39.2	30.6	30.4	29.2	28.7	28.4	30.4	32.8	34.2	153.8	308.1
2. Provide temporary 100% bonus depreciation	ppisa &												50011
(sunset 12/31/22) [15]	sppoga 9/27/17	-36.2	-40.4	-23.3	-13.4	-11.0	8.8	22.3	14.9	10.6	6.4	-124.3	-61.3
and live theater (sunset 12/31/22)	Ppisa 9/27/17	-0.8	-1.6	-1.3	-1.0	-0.8	0.3	1.3	1.0	0.7	0.6	-5.5	-1.7

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Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
ppies 12/31/17					Estima	te Include	d in Item I	I.D.2				
	[3]	[3]	[3]	-0.1	-0.2	-0.3	-0.2	-0.1	[3]	[3]	-0.4	-1.1
					21.1	27.0	25.5	17.4	10.2	7.1	70.5	157.8
				1.8	2.3	2.9	3.7	4.5	5.6	6.7	7.0	30.5
					-1.2	-1.3	-1.2	-1.4	-1.6	-1.3	-4.4	-11.1
									26.3	35.8		62.1
apoia 12/31/23												
anais DOE	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
apoia DOE	[2]	[5]	[-]	[-1	L-3							
1 - 12/21/19	0.3	3.4	7.9	8.7	9.1	9.5	10.0	10.3	10.5	11.5	28.8	80.7
tyba 12/31/18	-0.5	3.1	7.5	0.,	15.500							
10/21/17 0-												
The second second second	1.6	2.0	2.1	2.1	2.2	2.3	2.4	2.5	2.8	2.9	10.0	22.9
									1.9	2.0	7.9	17.4
apoia 12/31/17	1.3	1.5	1.7	1.7	1.0	110	5.5.5					
	1.0	2.0	1.6	1.6	0.6	0.2	0.2	0.2	0.2	0.2	7.8	8.9
tyba 12/31/17	1.9	2.0	1.0	1.0	0.0	0.2	0.2	0.2				
		0.1	1.5	1.6	0.0	0.2	0.2	0.3	0.3	0.3	7.4	8.7
. tyba 12/31/17	1.3	2.1	1.5	1.3	0.9	0.2	0.2	0.5	0.5	0.0		
		1.5	1.0	2.2	20	3.2	3.7	4.2	47	5.1	9.0	29.9
. apoii tyba 12/31/17	0.5	1.5	1.9	2.3	2.0	3.2	3.1	7.2	1.7	5.1	,,,	
				0.6	0.5	0.2	0.2	0.2	0.2	0.2	2.0	3.
[19]	[5]	0.3	0.6	0.6					0.2	0.2	2.0	
tyba 12/31/17					IV	egiigibie R	(evenue <u>Lj</u>	<i>jeci</i>				
		ATTO - 1/10			0.2	0.0					_4 1	-4.3
tyba 12/31/17	-0.7	-1.5	-1.1	-0.5	-0.3	-0.2					-4.1	
		12 NO	9 74		1.4	1.5	1.5	1.5	1.6	1.6	6.8	14.5
tyba 12/31/17	0.8											
ar bia 12/31/17	0.4	1.1	1.4	1.7	1.9	2.0	2.0	2.1	2.1	۷.1	0.5	10.0
						0.0	0.0	0.2	0.2	0.2	1.3	2.4
seaoda 12/31/17	0.2	0.4	0.3	0.2	0.2	0.2	0.2	0.2	0.2	0.2	, 1.5	2.
					2		^ ~	0.7	0.7	0.5	, 24	6.
tyba 12/31/17	0.1	1.2	0.7	0.7	0.7	0.7	0.7	0.7	0.7	0.7	3.4	0.
•							520 11	-		0.0	, , , , ,	
tyba 12/31/17	0.3	0.4	0.4	0.4	0.4 -0.1	0.4	0.4 [5]	0.4 [5]	0.4 -0.1	0.3 -0.1		
				-0.2		-0.1						
	ppisa 12/31/17 ppisa 12/31/17 lai tyba 12/31/17 generally eca 12/31/17 ppisa 12/31/17 apoia 12/31/25 apoia DOE tyba 12/31/18 apoia 12/31/17 & apoia 12/31/17 tyba 12/31/17 tyba 12/31/17 [19] tyba 12/31/17 [19] tyba 12/31/17 tyba 12/31/17	ppisa 12/31/17 [3] lai tyba 12/31/17 [3] lai tyba 12/31/17 0.6 ppisa 12/31/17 -0.4 apoia 12/31/25 apoia DOE [3] tyba 12/31/18 -0.3 apoia 12/31/17 & apoia 12/31/17 & apoia 12/31/17 1.3 tyba 12/31/17 1.3 tyba 12/31/17 1.3 apoii tyba 12/31/17 0.5 [19] [5] tyba 12/31/17 tyba 12/31/17 -0.7 tyba 12/31/17 0.8 ar bia 12/31/17 0.4 seaoda 12/31/17 0.2 tyba 12/31/17 0.4 seaoda 12/31/17 0.2	ppisa 12/31/17	ppisa 12/31/17	ppisa 12/31/17	ppisa 12/31/17 [3] [3] [3] -0.1 -0.2 lai tyba 12/31/17 13.0 12.7 10.0 13.8 21.1 generally eca 12/31/17 -0.6 1.0 1.3 1.8 2.3 ppisa 12/31/17 -0.4 -0.8 -0.9 -1.0 -1.2 apoia 12/31/25 apoia DOE [3] [3] [3] [3] [3] [3] tyba 12/31/18 -0.3 3.4 7.9 8.7 9.1 apoia 12/31/17 & apoia 12/31/17 & apoia 12/31/17 1.3 1.5 1.7 1.7 1.8 tyba 12/31/17 1.9 2.0 1.6 1.6 0.6 tyba 12/31/17 1.3 2.1 1.5 1.5 0.9 apoii tyba 12/31/17 0.5 1.5 1.9 2.3 2.8 [19] [5] 0.3 0.6 0.6 0.5 apoii tyba 12/31/17 -0.7 -1.5 -1.1 -0.5 -0.3 tyba 12/31/17 0.8 1.8 1.4 1.4 1.4 tyba 12/31/17 0.8 1.8 1.4 1.4 1.7 tyba 12/31/17 0.8 1.8 1.4 1.4 1.7 ar bia 12/31/17 0.8 1.8 1.4 1.4 1.7 ar bia 12/31/17 0.4 1.1 1.4 1.7 1.9 seaoda 12/31/17 0.2 0.4 0.3 0.2 0.2 tyba 12/31/17 0.1 1.2 0.7 0.7 0.7	ppisa 12/31/17	ppisa 12/31/17	ppisa 12/31/17	Popisa 12/31/17 13.0 12.7 10.0 13.8 21.1 27.0 25.5 17.4 10.2	Ppisa 12/31/17	Pissa 12/31/17 13.0 12.7 10.0 13.8 23.1 27.0 25.5 17.4 10.2 7.1 70.5

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
J. Insurance													
1. Net operating losses of life insurance companies	tyba 12/31/17					E							
2. Repeal of small life insurance company deduction	tyba 12/31/17	[5]	[5]	[5]	rea			ed in Item 1				~	
3. Adjustment for change in computing reserves	tyba 12/31/17	0.2	0.1	[5] 0.1	[5] 0.1	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.2
4. Repeal of special rule for distributions to shareholders	.,	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.6	1.3
from pre-1984 policyholders surplus account	tyba 12/31/17	[5]	[5]	F53	[6]	[6]	5.63	5.53					
Modification of proration rules for property and	-y = = = = = = = = = = = = = = = = = = =	[2]	[2]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
casualty insurance companies	tyba 12/31/17	0.2	0.3	0.2	0.2	0.2	0.2	0.0	0.0				
6. Repeal of special estimated tax payments	tyba 12/31/17	[5]	[5]	[5]	[5]	0.2	0.2	0.2	0.2	0.2	0.2	1.1	2.2
7. Capitalization of certain policy acquisition expenses	tyba 12/31/17	0.4	1.5	2.1	2.2	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
8. Tax reporting for life settlement transactions	generally tyba 12/31/17	[3]	[3]	[5]		2.4	2.5	2.7	2.9	3.1	3.2	8.6	23.0
9. Clarification of tax basis of life insurance contracts	generally teia 8/25/09	[-]	[2]		[5]	[5]	[5]	[5]	[5]	0.1	0.1	[5]	0.2
10. Exception to transfer for valuable consideration rules	ta 12/31/17					Estima	te inciuae	d in Item I	'.J.8 ·				
K. Partnerships						Estima	<i>те іпсінае</i>	d in Item I	.J.8 ·				
1. Tax gain on the sale of a partnership interest on look-thru													
basis	saea 12/31/17	[5]	0.2	0.3	0.3	0.4	0.5	0.7					
2. Expand the definition of substantial built-in loss for	5444 12/31/17	[2]	0.2	0.3	0.5	0.4	0.5	0.5	0.5	0.5	0.6	1.2	3.8
purposes of partnership loss transfers	topia 12/31/17	[5]	[5]	0.1	0.1	0.1	0.1						-/48
3. Charitable contributions and foreign taxes taken into	10pta 12/31/1/	[5]		0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.5
account in determining limitation on allowance of													
partner's share of loss	tyba 12/31/17	[5]	0.1	0.1	0.1	0.1							
L. Tax-Exempt Organizations	1,04 12/31/17	[2]	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.5	1.2
1. Excise tax based on investment income of private													
colleges and universities	tyba 12/31/17	0.2	0.2	0.2	0.2	0.2	0.2	0.0					
2. Name and logo royalties treated as unrelated business	tyou 12/51/17	0.2	0.2	0.2	0.2	0.3	0.3	0.3	0.3	0.3	0.3	1.2	2,5
taxable income	tyba 12/31/17	0.2	0.2	0.2	0.2	0.2	0.0						
3. Unrelated business taxable income separately computed	generally	0,2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.3	0.8	2.0
for each trade or business activity	tyba 12/31/17	0.3	0.3	0.3	0.2	0.3	0.0						
4. Repeal tax-exempt status for professional sports leagues	tyba 12/31/17	[5]			0.3	0.3	0.3	0.3	0.3	0.3	0.4	1.6	3.2
5. Modification of taxes on excess benefit transactions	tyou 12/51/17	[2]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1
(intermediate sanctions)	tyba 12/31/17					3.7							
6. Exception to private foundation excess business holdings	tyba 12/31/17					Neg	ligible Re	venue Effec	et				
rules for philanthropic business holdings	tyba 12/31/17	[5]	[5]	[6]	661	5.63	5.07		_				
7. Charitable deduction not allowed for amounts paid in	tybu 12/31/17	[5]	[3]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]
exchange for college athletic event seating rights	cmi tyba 12/31/17	0.2	0.2	0.0	0.0								
8. Repeal substantiation exception for charitable	Cim tyba 12/31/17	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.9	1.9
contributions reported by donee organization	cmi tyba 12/31/16												į.
M. Retirement Savings	omi tyba 12/31/10					Negi	igible Rev	enue Effec	t				
1. Conformity of contribution limits for employer-sponsored	pyba &												
plans	tyba 12/31/17	0.1	0.1	0.1	0.0	0.0							* ************************************
Repeal of special rule permitting recharacterization	tyoa 12/51/17	0.1	0.1	0.1	0.2	0.2	0.2	0.2	0.2	0.2	0.2	0.7	1.7
of IRA contributions	tyba 12/31/17	[5]	[6]	F. 6.3	F.63	5.63							
	cyon 12/31/17	[5]	[5]	[5]	[5]	[5]	0.1	0.1	0.1	0.1	0.1	0.2	0.5

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27	l
1. 6 11:														
Length of service awards for public safety volunteers [22]	tyba 12/31/17	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	-0.1	-0.1	-0.1	-0.1	-0.5	
4. Extended rollover period for certain plan loan offsets	tyba 12/31/17 -					Neg	gligible Re	venue Effe	ct					
N. Other Provisions														
Modify tax treatment of Alaska Native Corporations and		547	F0.7	[2]	[2]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	
Settlement Trusts	[23]	[3]	[3]	[3]	[3]	[3]	[3]	[5]	[5]	[2]	[~]	LF.G		
2. Modification of low income housing	generally					Nes	oligible Re	venue Effe	ect					
program	12/31/17 -					1,02	58							,
3. Expansion of qualifying beneficiaries of an electing small	1/1/18 feoqb &													P
business trust, and modify charitable contribution	tyba 12/31/17 fc	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.1	-0.3	
deduction for electing small business trusts	generally	[-]	r-1											1
4. Craft beverage modernization and tax reform (sunset 12/31/19)	1/1/18	-1.6	-1.5	-1.1			1					-4.2	-4.2	1
5. Exempt amounts paid for aircraft management services								to seeming.			507	[2]	[2]	1
from the excise taxes imposed on transportation by air	apa DOE	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3] -7.7	[3] -1.6	1
6. Create qualified opportunity zones	DOE	-1.2	-1.7	-1.6	-1.7	-1.6	-1.5	-1.5	-1.6	8.1	2.7	-/./	-1.0	1
7. Deny deduction for settlements subject to a nondisclosure				200		5.63	563	r.c.1	[5]	[5]	[5]	[5]	[5]	1
agreement paid in connection with sexual harassment	apoia DOE	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[2]	[2]	[2]	1
8. Uniform treatment of expenses in contingency fee				0.1	0.1	0.1	[5]	[5]	[5]	[5]	[5]	0.4	0.5	
cases	eacpoii tyba DOE	[5]	0.1	0.1	0.1	0.1	[5]	[5]	[2]	[2]	[2]			
Expand provision relating to the non-deductibility		r.c.1	[6]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.1	
of fines and penalties	apoiooa DOE	[5]	[5] [5]	[5] 0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.3	0.6	
10. Repeal of deduction for local lobbying expenses	apoio/a DOE	[5]	[3]	0.1	0.1	0.1	0.1							
11. Recharacterization of certain gains on property held for														
fewer than 3 years in the case of partnership profits														
interest held in connection with performance of investment	tyba 12/31/17	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.7	1.2	
services	•			111.4	-95.0	-82.6	-59.4	-48.8	-65.0	-42.2	-48.3	-418.4	-682.4	
Total of Business Tax Reform		-35.6	-93.8	-111.4	-95.0	-02.0	-37.4	-40.0	02.0					
III. International Tax Reform														
A. Establishment of Participation Exemption System for														
Taxation of Foreign Income														
1. Deduction for dividends received by domestic		17.6	26.2	-18.2	-20.1	-20.5	-20.4	-21.7	-22.7	-23.3	-24.6	-102.8	-215.5	
corporations from certain foreign corporations	[24]	-17.6	-26.3	-18.2	-20.1	-20.5	-20.4	21.7	22,7					
2. Special rules relating to sales or transfers involving	dri tyba &	0.2	0.2	0.5	0.8	1.2	1.4	1.6	1.5	1.7	2.2	2.9	11.3	9
certain foreign corporations	Ta 12/31/17	0.2	0.2	0.5	0.0									
3. Treatment of deferred foreign income upon transition														
to participation exemption system of taxation and														
mandatory inclusion at two-tier rate (5-percent rate	[25]	45.2	21.5	5.9	6.5	7.5	16.0	29.9	41.6	18.8	-8.1	86.6	184.8	
for illiquid assets, 10-percent rate for liquid assets)	[25]													
B. Rules Related to Passive and Mobile Income Current year inclusion of global intangible low-taxed									.04 10	0.00			100	
income, with deduction, by United States shareholders	. [24]	19.6	24.6	9.7	9.4	9.0	8.6	8.9	8.9	15.1	21.3			1
income, with acquetion, by office offices states												Deputs		

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Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
2. Deduction for foreign-derived intangible income derived													
from trade or business within the United States	tyba 12/31/17	-1.3	3.7	6.0	<i>C</i> 1	0.2							
3. Special rules for transfers of intangible property from	tyba 12/31/17	-1.3	3.7	6.8	6.4	0.3	-11.4	-15.8	-19.9	-17.8	-15.3	15.9	-64.4
controlled foreign corporations to United States													
shareholders	[26]	-3.9	-7.3	-8.9	10.1	0.2	0.0						
C. Other Modifications of Subpart F Provisions	[20]	-3.9	-1.3	-0.9	-12.1	-8.3	-0.9	1.7	1.8	1.9	1.9	-40.6	-34.1
1. Elimination of inclusion of foreign base company													
oil related income	[24]	-0.1	-0.3	-0.3	-0.3	0.4	0.4	0.4					
2. Inflation adjustment of de minimis exception for	[27]	-0.1	-0.5	-0.5	-0.3	-0.4	-0.4	-0.4	-0.5	-0.5	-0.6	-1.4	-4.0
foreign base company income	[24]	[3]	[3]	[3]	[2]	F23	[2]	523	507		100		
3. Repeal of inclusion based on withdrawal of previously	[21]		[5]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-0.2	-0.4
excluded subpart F income from qualified investment	[24]	[3]	[3]	[2]	[2]	F0.7	F07	507		-			
4. Modification of stock attribution rules for determining	[24]	[3]	[5]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]
status as a controlled foreign corporation	[25] -					r							
5. Modification of definition of United States shareholder	[24]	0.2	0.2	0.1	0.1			d in Item 1					
6. Elimination of requirement that corporation must be	[24]	0.2	0.2	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.8	1.4
controlled for 30 days before subpart F inclusions apply	[24]	[5]	0.1	[6]	F.6.3	5.63	5.53						
7. Look-thru rule for controlled foreign corporations	[24]	[3]	0.1	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.2	0.4
made permanent	[27]			-0.8	1.0	1.2	4.04				200 0		
8. Corporations eligible for deduction for dividends from	[27]			-0.8	-1.2	-1.3	-1.4	-1.5	-1.7	-1.8	-2.0	-3.3	-11.8
controlled foreign corporations exempt from subpart F to													
investments in United States property	[24]	-0.1	-0.2	-0.2	0.0	0.0	0.0						
D. Prevention of Base Erosion	[24]	-0.1	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-0.2	-1.0	-2.0
1. Denial of deduction for interest expense of United States													
shareholders which are members of worldwide affiliated													
groups with excess domestic indebtedness	tyba 12/31/17	0.5	0.8	0.7	0.0	0.7	0.0		2.2				781
2. Limitation on income shifting through intangible	tyba 12/31/17	0.5	0.8	0.7	0.8	0.7	0.9	1.0	0.9	1.2	1.3	3.5	8.8
property transfers	Ta tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1						
3. Certain related party amounts paid or accrued in	1 a tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.5	1 1 1.3
hybrid transactions or with hybrid entities	tyba 12/31/17 -												likely thla
4. Termination of special rules for domestic international	tyba 12/31/17 -					Estimai	te Included	d in Item L	II.A.1			V.	Jan Jan
sales corporation	tyba 12/31/18		0.3	0.5	0.6	0.6	0.6	0.5				•	
5. Surrogate foreign corporations not eligible for	tyba 12/31/18		0.3	0.3	0.6	0.6	0.6	0.6	0.7	0.7	0.7	2.0	5.3
reduced rate on dividends	dpa 12/31/17	0.1	0.1	0.1	0.1	0.1	0.4						
E. Modifications Related to Foreign Tax Credit System	upa 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.3	0.7
1. Repeal of section 902 indirect foreign tax credits;													
determination of section 960 credit on current year													
basis	[24]												
Separate foreign tax credit limitation basket for	[24]					Estimat	e Included	t in Item II	I.A.1				
foreign branch income	tyba 12/31/17					F							
3. Acceleration of election to allocate interest, etc., on a	tyba 12/31/17					Estimat	e Included	l in Item II	I.B.1				
worldwide basis	tyba 12/31/17	-0.3	0.6	0.7	0.4								
	tyva 12/31/17	-0.3	-0.6	-0.7	-0.4							-2.0	-2.0

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Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
Source of income from sales of inventory determined solely on basis of production activities	tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.3	0.5
F. Inbound Provisions 1. Base erosion and anti-abuse tax	apoaa 12/31/17	3.8	9.3	11.4	12.1	12.6	13.4	14	14.6	20.2	26.3	49.2	137.6
G. Other Provisions Taxation of passenger cruise gross income of foreign corporations and nonresident alien individuals	tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.4	0.7
Restriction on insurance business exception to passive foreign investment company rules	tyba 12/31/17	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.2	0.2	0.2	0.5	1.1
Repeal of fair market value method of interest expense apportionment Treatment of sourcing rules for U.S. territories	tyba 12/31/17 tyba 12/31/18	[5] 	0.1 [3]	0.1 -0.1	[5] -0.1	0.2 -0.3	0.2 -0.6						
Repeal exclusion applicable to certain passenger aircraft operated by a foreign corporation	tyba 12/31/17	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1	0.2
6. Increase the excise tax on stock compensation in an inversion from 15 percent to 20 percent	DOE	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	0.1
Total of International Tax Reform		46.7	26.5	6.9	2.8	1.7	6.7	18.6	25.7	16.7	3.6	84.1	154.6
IV. Revenue-Dependent Repeals	[29]								[30]	[30]	[30]		[30]
NET TOTAL		-38.4	-224.5	-246.9	-217.5	-198.6	-167.0	-140.7	-145.1	-64.2	30.6	-926.3	-1,414.2

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is generally assumed to be December 1, 2017.

Legend for "Effective" column:

apa = amounts paid after

apoia = amounts paid or incurred after

apoaa = amounts paid or accrued after

apoii = amounts paid or incurred in

apoio/a = amounts paid or incurred on or after

ar = advance refunding

bia = bonds issued after

cmi = contributions made in

DOE = date of enactment

da = distributions after

dda = decedents dying after

doia = discharges of indebtedness after

dpa = dividends paid after

dri = dividends received in

eacpoii = expenses and costs paid or incurred in

eca = exchanges completed after

facii = fees and costs incurred in

fc = for charitable

feoqb = for expansion of qualifying beneficiaries

gma = gifts made after

laaitrtia = levied amounts, and interest thereon,

returned to individuals after

lai = losses accrued in

pdtnc = payments due to non-coverage

ppisa = property placed in service after

Ppisa = productions placed in service after

ppisi = property placed in service in

pyba = plan years beginning after

saea = sales and exchanges after seaoda = sales, exchanges, and other dispositions after spa = services performed after spo/a = service provided on or after

sppoga = specified plants planted or grafted after

ta = transactions after

Ta = transfers after

teia = transactions entered into after

topia = transfers of partnership interests

tyba = taxable years beginning after

[Footnotes for JCX-59-17 appear on the following page]

Footnotes for JCX-59-17:

2] Estimate includes the following outlay effects:	<u>2018</u>	2019	2020	2021	2022	2023	2024	2025	2026	2027	2010.22	2010
10%, 12%, 22%, 24%, 32%, 35%, and 38.5% tax brackets		1.0	1.1	1.2	1.2	1.2	1.2	1.2	1.3	[28]	2018-22	2018-2
Modify standard deduction		9.4	9.7	10.2	10.4	10.5	10.6	10.7	10.9	[28]	4.4	9
Repeal personal exemptions	-10.8	-15.9	-16.3	-16.6	-16.9	-17.2	-17.4	-17.7	-5.3	[20]	39.7	82
Alternative inflation measure		-0.3	-0.6	-1.3	-1.6	-2.1	-2.5	-3.1	-3.6	-4.1	-76.6	-134
Modification of child tax credit		18.0	18.4	18.3	18.3	20.3	20.2	20.2	20.2		-3.9	-19
Require valid Social Security number of each child to claim refundable portion							20.2	20.2	20.2		73.0	153
of child credit (otherwise \$500 dependent credit)		-3.2	-3.0	-2.9	-2.9	-2.9	-2.9	-2.8	-2.8	0.5	10.0	
Repeal of itemized deductions for taxes not paid or accrued in a trade or						,	2.7	-2.0	-2.0	-0.5	-12.0	-23
business, interest on home equity debt, non-disaster casualty losses and												
certain miscellaneous expenses		-0.5	-0.4	-0.4	-0.4	-0.4	-0.4	-0.4	-0.4		1.6	
Repeal of alternative minimum tax on corporations.	10.8	3.8	-0.4	-0.3				-0.7	-0.4		-1.6	-3
Reduce amount of the ACA individual shared responsibility payment to zero		-6.2	-12.9	-28.2	-35.2	-38.4	-40.7	-43.1	-45.2	47.0	13.9	13
Clarification of IRS whistleblower awards	[28]	[28]	[28]	[28]	[28]	[28]	[28]	[28]		-47.8	-82.5	-297
Estimate includes the following budget effects:					r1	[20]	[20]	[20]	[28]	[28]	[28]	C
Total Payance Effect (CECA):	2018	<u>2019</u>	2020	2021	2022	2023	2024	2025	2026	2027	2010.00	
Total Revenue Effect (SECA interaction)	-1.3	-1.8	-1.6	-1.3	-0.9	1.7	2.7	1.9	2026 0.4	<u>2027</u>	2018-22	<u>2018-</u>
On oddget effects	-0.2	-0.4	-0.3	-0.3	-0.2	0.3	0.6	0.4	0.4		-6.8	-0
Off-budget effects	-1.0	-1.4	-1.2	-1.0	-0.7	1.4	2.2	1.5	0.1		-1.4	[.
Fetimete includes the following to the control of t							4.2	1.5	0.5		-5.4	[:
Estimate includes the following budget effects:	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2010.00	
Total Revenue Effect.	0.4	0.6	0.6	0.6	0.6	0.6	0.6	0.7	2026 0.2	<u>2027</u>	2018-22	2018-2
On-budget effects	0.3	0.4	0.5	0.5	0.5	0.5	0.5	0.7			2.7	4
Off-budget effects	0.1	0.1	0.1	0.1	0.1	0.1	0.3	0.3	0.1		2.2	3
Detinate metades policy that retains exclusion under section 217(a) (malatal 4)	of the Arm	ned Forces)			0	0.1	0.1	0.1			0.6	1.
Settlet provided by the Joint Committee on Taxation staff in collaboration with the Ca	ngressiona	l Budget Ó	ffice.									
and the following budget effects:	2018	2019	2020	2021	2022	2023	2024	2025	2026			
Total Revenue Effect		6.5	10.2	28.8	37.5	41.2	<u>2024</u> 44.1	2025	<u>2026</u>	<u>2027</u>	<u>2018-22</u>	<u>2018-2</u>
On-budget effects		6.5	9.4	26.9	35.2	38.8	44.1 41.4	46.8 43.9	50.1 47.2	53.2 50.4	83.0	318.
Off-budget effects											78.0	299.

^[10] Effective with respect to: (1) levies made after the date of enactment; and (2) levies made on or before the date of enactment provided that the nine-month period has not expired as of the date of enactment. [11] Effective for agreements entered into on or after the date that is 60 days after date of enactment.

^[12] Applies to the "Mississippi River Delta flood area" defined as the area with respect to which a major disaster has been declared by the President under section 401 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act before March 31, 2016, by reason of severe flooding occurring in Louisiana, Texas, and Mississippi during March of 2016, or before September 3, 2016, by reason of severe flooding occurring in Louisiana during August of 2016.

^[13] Effective for information provided before, on, or after the date of enactment with respect to which a final determination has not been made before such date.

Footnotes for Table JCX-59-17 continued:

- [14] The expansion of the threshold allowing the use of the cash method, the creation of an exemption from the requirement to use inventories, and the expansion of the exception from the uniform capitalization rules are effective for taxable years beginning after December 31, 2017. The expansion of the exception from the requirement to use the percentage of completion method is effective for contracts entered into after December 31, 2017, in taxable years ending after such date. The threshold applicable to each provision is indexed for inflation for taxable years beginning after December 31, 2018.
- [15] Estimate contains interaction with the section 179 expansion in II.C.1.
- [16] Estimate includes the following provisions: for nonresidential real property, reduce the applicable recovery period to 25 years from 39 years; for residential rental property, reduce the applicable recovery period to 25 years from 27.5 years; for qualified improvement property, reduce the applicable recovery period to 10 years from 15 years.

[10] Estimate includes the annica	ible recove	ery period	to 10 year	S HOID 13	years.						2010 22	2018-27
period to 25 years from 27.5 years; for qualified improvement property, reduce the application	2010	2010	2020	2021	2022	2023	2024	2025	<u> 2026</u>	<u> 2027</u>	<u>2018-22</u>	2016-21
[17] Estimate includes the following budget effects:	2018	<u> 2019</u>	2020	<u> 2021</u>	2022	2.2	2.4	2.5	2.8	2.9	10.0	22.9
[17] Estimate includes the following budget effects:	1.6	2.0	2.1	2.1	2.2	2.3	2.4	2.5	2.0	2.4	0.2	19.0
Total Revenue Effect	1.2	1.6	17	1.8	1.8	1.9	2.0	2.1	2.4	2.4	8.2	15.0
On-budget effects	1.5	1.6	1.7	0.4	0.4	0.4	0.4	0.4	0.4	0.4	1.8	3.9
Oil-budget officers	0.3	0.4	0.4	0.4	0.4		0.4		2026	2027	2018-22	2018-27
Off-budget effects	2018	2019	2020	2021	2022	<u> 2023</u>	<u> 2024</u>	<u> 2025</u>	<u>2026</u>	<u>2027</u>	2010-22	2010 21
[18] Estimate includes the following budget effects:	2018	2017	1.7	1.7	1.8	1.8	1.8	1.9	1.9	2.0	7.9	17.4
Total Revenue Effect	1.3	1.5	1.7	1.7	1.0	1.0	1.5	1.5	1.5	1.6	6.4	13.9
Total Revenue Effect	1.0	1.2	1.3	1.3	1.4	1.4	1.5	1.5	1.3	1.0	0.1	2.5
On-budget effects		0.2	0.2	Λ3	0.4	0.4	0.4	0.4	0.4	0.4	1.6	3.3
	0.3	0.3	0.3	0.5		0.	6 . D	h on 2	1 2017 th	e 24mon	th	
Off-budget effects	on rule pro	widing the	at for build	dings owne	ed or lease	d at all tin	nes after Do	ecember 3	1, 201/, th	C 2-1 111011	***	

- [19] Generally effective for amounts paid or incurred after December 31, 2017, with a transition rule providing that for buildings owned or leased at all times after December 31, 2017, the 24-month period for making qualified rehabilitation expenditures begins no later than 180 days after the date of enactment, and the repeal is effective for such expenditures paid or incurred after the end of the taxable year in which such 24-month period ends.
- [20] Transition rule for any remuneration under a written binding contract which was in effect on November 2, 2017, and which was not modified thereafter in any material respect.
- [21] Effective for options exercised or restricted stock units settled after December 31, 2017. The penalty for failure to provide a notice is effective for failures after December 31, 2017.
- 2018-27 2018-22 2027 <u>2020</u> 2019 2018 -0.5[22] Estimate includes the following budget effects: -0.1-0.1-0.1-0.1-0.1 [3] [3] [3] [3] [3] Total Revenue Effect.... [3] [3] -0.3-0.1-0.1 [3] [3] [3] [3] [3] [3] On-budget effects.... [3] [3] -0.2[3] [3] -0.1[3] [3] [3] [3] [3] [3] [3] Off-budget effects.... [3]
- [23] Generally, taxable years beginning after December 31, 2016. The deduction for contributions to a Settlement Trust is effective for taxable years for which the Native Corporation's refund statute of limitations period has not expired, with a one-year waiver of the refund statute of limitations period in the event that the period expires before the end of the one-year period
- [24] Effective for taxable years of foreign corporations beginning after December 31, 2017, and to taxable years of United States shareholders with or within which such taxable years of foreign corporations end.
- [25] Effective for the last taxable year of foreign corporations beginning before January 1, 2018, and all subsequent taxable years of foreign corporations and for the taxable years of a United States shareholder
- [26] Effective for distributions made in taxable years of foreign corporations beginning after December 31, 2017, and for taxable years of United States shareholders with or within which such taxable years of
- [27] Effective for taxable years of foreign corporations beginning after December 31, 2019, and to taxable years of United States shareholders with or within which such taxable years of foreign corporations end.
- [29] Repeal provisions are effective for taxable years beginning after December 31, 2025, and reporting requirements and penalties are effective for taxable years beginning after December 31, 2024.
- [30] Negligible revenue effect.