

JOINT COMMITTEE ON TAXATION

April 3, 2014

JCX-32-14

ESTIMATED REVENUE EFFECTS OF THE CHAIRMAN'S MODIFICATION TO
THE "EXPIRING PROVISIONS IMPROVEMENT REFORM AND EFFICIENCY ACT OF 2014,"
SCHEDULED FOR MARKUP BY THE COMMITTEE ON FINANCE ON APRIL 3, 2014

Fiscal Years 2014 - 2024

[Millions of Dollars]

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
I. Provisions Expiring in 2013														
A. Individual Tax Extenders														
1. Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15).....	tyba 12/31/13	-11	-246	-173	---	---	---	---	---	---	---	---	-430	-430
2. Discharge of indebtedness on principal residence excluded from gross income of individuals (sunset 12/31/15).....	doioa 12/31/13	-471	-3,012	-1,929	---	---	---	---	---	---	---	---	-5,413	-5,413
3. Parity for exclusion for employer-provided mass transit and parking benefits (sunset 12/31/15) [1].....	ma 12/31/13	-44	-105	-30	---	---	---	---	---	---	---	---	-180	-180
4. Premiums for mortgage insurance deductible as interest that is qualified residence interest (sunset 12/31/15).....	apoa 12/31/13	-138	-922	-794	---	---	---	---	---	---	---	---	-1,854	-1,854
5. Deduction for State and local general sales taxes (sunset 12/31/15).....	tyba 12/31/13	[2]	-3,382	-2,872	-240	---	---	---	---	---	---	---	-6,494	-6,494
6. Contributions of capital gain real property made for qualified conservation purposes (sunset 12/31/15).....	tyba 12/31/13	-23	-64	-53	-12	-2	-7	-21	-27	-23	-20	-18	-160	-268
7. Above-the-line deduction for qualified tuition and related expenses (sunset 12/31/15).....	tyba 12/31/13	-15	-344	-237	---	---	---	---	---	---	---	---	-596	-596
8. Tax-free distributions from IRAs to certain public charities for individuals age 70-1/2 or older, not to exceed \$100,000 per taxpayer per year (sunset 12/31/15).....	dmi tyba 12/31/13	-248	-633	-411	-50	-55	-57	-60	-63	-66	-68	-70	-1,453	-1,779
B. Business Tax Extenders														
1. Research credit (sunset 12/31/15).....	apoa 12/31/13	-2,171	-3,911	-2,341	-1,226	-1,079	-949	-838	-763	-726	-703	-664	-11,677	-15,371
2. Temporary minimum LIHTC rate for non-Federally subsidized new buildings (9%) and existing buildings (4%) (sunset 12/31/15).....	ama 12/31/13	---	-1	-2	-4	-5	-6	-6	-6	-6	-6	-6	-19	-49
3. Military housing allowance exclusion for determining area median gross income (sunset 12/31/15).....	da 12/31/13	-1	-4	-5	-5	-5	-5	-5	-5	-5	-5	-4	-25	-49
4. Indian employment tax credit (sunset 12/31/15).....	tyba 12/31/13	-21	-51	-39	-11	-1	---	---	---	---	---	---	-124	-124
5. New markets tax credit (sunset 12/31/15).....	cyba 12/31/13	-2	-5	-27	-90	-171	-221	-252	-279	-288	-267	-234	-514	-1,835
6. Railroad track maintenance credit (sunset 12/31/15).....	epoi tyba 12/31/13	-72	-207	-135	[2]	---	---	---	---	---	---	---	-414	-414
7. Mine rescue team training credit (sunset 12/31/15).....	tyba 12/31/13	-1	-2	-1	-1	[2]	[2]	[2]	---	---	---	---	-3	-5
8. Modify the employer wage credit for activated military reservists (sunset 12/31/15).....	pma 12/31/13	-5	-58	-121	-79	-12	---	---	---	---	---	---	-274	-274

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
9. Extension and expansion of the work opportunity tax credit to include the long-term unemployed (sunset 12/31/15).....	wpoifibwa 12/31/13	-449	-1,126	-938	-368	-164	-81	-31	-4	---	---	---	-3,127	-3,162
10. Extension and modification of qualified zone academy bonds (sunset 12/31/15).....	oia 12/31/13 & [3]	[2]	-3	-11	-24	-34	-39	-38	-36	-34	-33	-32	-111	-284
11. Classification of certain race horses as 3-year property (sunset 12/31/15).....	ppisa 12/31/13	-24	-73	-71	-13	26	39	43	38	22	6	---	-117	-9
12. 7-year recovery period for motorsports entertainment complexes (sunset 12/31/15) [4].....	ppisa 12/31/13	-3	-12	-18	-15	-10	-7	-6	-5	-1	2	3	-64	-71
13. 15-year straight-line cost recovery for qualified leasehold improvements, qualified restaurant buildings and improvements, and qualified retail improvements (sunset 12/31/15) [5].....	ppisa 12/31/13	-67	-273	-483	-551	-542	-522	-498	-494	-492	-476	-426	-2,438	-4,825
14. Accelerated depreciation for business property on an Indian reservation (sunset 12/31/15).....	ppisa 12/31/13	-56	-155	-138	-32	31	65	73	49	17	-4	-8	-285	-158
15. Bonus depreciation:														
a. Additional first-year depreciation for 50% of basis of qualified property (sunset 12/31/15) [6].....	ppisa 12/31/13 ityeasd	-8,126	-73,611	1,958	28,047	18,113	13,159	8,823	4,851	2,353	1,012	568	-20,459	-2,852
b. Election to accelerate AMT credit in lieu of bonus depreciation (sunset 12/31/15).....	ppisa 12/31/13 ityeasd	-121	-265	-171	-34	-2	-3	-3	-2	-1	[2]	[2]	-596	-602
16. Enhanced charitable deduction for contributions of food inventory (sunset 12/31/15).....	cma 12/31/13	-57	-145	-89	---	---	---	---	---	---	---	---	-292	-292
17. Increased expensing limitations and treatment of certain real property as section 179 property (sunset 12/31/15).....	tyba 12/31/13	-7,019	-12,294	-1,263	6,398	4,067	2,952	2,008	1,103	547	260	157	-7,158	-3,083
18. Election to expense mine safety equipment (sunset 12/31/15).....	ppisa 12/31/13	-12	-16	1	8	5	4	4	3	2	[7]	---	-9	---
19. Special expensing rules for certain film, television, and theatrical productions (sunset 12/31/15).....	pca 12/31/13	-37	-387	-64	136	104	59	44	36	30	26	26	-189	-27
20. Deduction allowable with respect to income attributable to domestic production activities in Puerto Rico (sunset 12/31/15).....	tyba 12/31/13	-36	-110	-76	---	---	---	---	---	---	---	---	-222	-222
21. Modify tax treatment of certain payments under existing arrangements to controlling exempt organizations (sunset 12/31/15).....	proaa 12/31/13	-14	-18	-4	---	---	---	---	---	---	---	---	-36	-36
22. Treatment of certain dividends of RICs (sunset 12/31/15).....	[8]	-68	-100	-30	---	---	---	---	---	---	---	---	-198	-198
23. Treatment of RICs as "qualified investment entities" under section 897 (FIRPTA) (sunset 12/31/15).....	1/1/14	-31	-47	-15	---	---	---	---	---	---	---	---	-93	-93
24. Exception under subpart F for active financing income (sunset 12/31/15).....	tyba 12/31/13	-2,033	-5,166	-3,175	---	---	---	---	---	---	---	---	-10,373	-10,373
25. Look-through treatment of payments between related CFCs under foreign personal holding company income rules (sunset 12/31/15).....	tyba 12/31/13	-808	-1,254	-389	---	---	---	---	---	---	---	---	-2,450	-2,450

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
26. Special rules applicable to qualified small business stock (sunset 12/31/15).....	saa 12/31/13	2	15	18	---	---	-134	-924	-925	---	---	---	-99	-1,948
27. Basis adjustment to stock of S corporations making charitable contributions of property (sunset 12/31/15).....	cmi tyba 12/31/13	-16	-58	-28	-2	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-104	-104
28. Reduction in S corporation recognition period for built-in gains tax (sunset 12/31/15).....	tyba 12/31/13	-15	-138	-59	-6	-5	-3	-2	-1	-1	-1	-1	-226	-232
29. Increase in limit on cover over of rum excise tax revenues (from \$10.50 to \$13.25 per proof gallon) to Puerto Rico and the Virgin Islands (sunset 12/31/15) [9] [10].....	abiUSa 12/31/13	-142	-168	-26	---	---	---	---	---	---	---	---	-336	-336
30. Economic development credit for American Samoa (sunset 12/31/15).....	tyba 12/31/13	-10	-15	-5	---	---	---	---	---	---	---	---	-29	-29
C. Energy Tax Extenders														
1. Modify section 25C nonbusiness energy property (sunset 12/31/15).....	ppisa 12/31/13	-198	-807	-643	---	---	---	---	---	---	---	---	-1,648	-1,648
2. Alternative fuel refueling property ((including extension for hydrogen property) (sunset 12/31/15).....	tyba 12/31/13 & tyba 12/31/14	-23	-42	-19	-3	-2	-1	[7]	1	1	1	1	-92	-89
3. Credit for electric motorcycles (sunset 12/31/15).....	vaa 12/31/13	[2]	-2	-1	---	---	---	---	---	---	---	---	-2	-2
4. Second generation biofuel producer credit (sunset 12/31/15).....	fsoua 12/31/13	-15	-28	-12	---	---	---	---	---	---	---	---	-55	-55
5. Incentives for biodiesel and renewable diesel:														
a. Income tax credits for biodiesel fuel, biodiesel used to produce a qualified mixture, and small agri-biodiesel producers (sunset 12/31/15).....	fsoua 12/31/13	-945	-1,276	-344	---	---	---	---	---	---	---	---	-2,565	-2,565
b. Income tax credits for renewable diesel fuel and renewable diesel used to produce a qualified mixture (sunset 12/31/15).....	fsoua 12/31/13	----- Estimate Included In Item I.C.5.a. -----												
c. Excise tax credits and outlay payments for biodiesel fuel mixtures (sunset 12/31/15).....	fsoua 12/31/13	----- Estimate Included In Item I.C.5.a. -----												
d. Excise tax credits and outlay payments for renewable diesel fuel mixtures (sunset 12/31/15).....	fsoua 12/31/13	----- Estimate Included In Item I.C.5.a. -----												
6. Modified credit for production of Indian coal (sunset 12/31/15).....	cpa 12/31/13	-18	-31	-15	-4	-3	-2	-1	[1]	---	---	---	-75	-76
7. Beginning-of-construction date for renewable power facilities eligible to claim the electricity production credit or investment credit in lieu of the production credit (sunset 12/31/15).....	ppisa 12/31/13	-75	-116	-234	-580	-1,049	-1,485	-1,749	-1,876	-1,992	-2,064	-2,127	-3,540	-13,347
8. Credit for construction of energy-efficient new homes (sunset 12/31/15).....	haa 12/31/13	-95	-192	-114	-55	-49	-42	-36	-23	-6	---	---	-547	-612
9. Special depreciation allowance for second generation biofuel plant property (sunset 12/31/15).....	ppisa 12/31/13	-1	-3	-2	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	-4	-1
10. Energy efficient commercial buildings deduction with modifications (sunset 12/31/15).....	ppisa 12/31/13	-107	-175	-58	7	6	6	5	4	3	3	2	-321	-304

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
11. Excise tax credits and outlay payments for alternative fuel, and excise tax credits for alternative fuel mixtures (including extensions for liquefied hydrogen) (sunset 12/31/15).....	fsoua 12/31/13 & fsoua 9/30/14	-327	-453	-122	---	---	---	---	---	---	---	---	-903	-903
Total of Provisions Expiring in 2013.....		-24,169	-111,491	-15,810	31,192	19,163	12,720	6,529	1,576	-666	-2,336	-2,833	-88,394	-86,124
II. Provisions Expiring in 2014														
A. Energy Tax Extenders														
1. Alternative motor vehicle credit for qualified fuel cell motor vehicles (sunset 12/31/15).....	tyba 12/31/14	---	-30	-16	---	---	---	---	---	---	---	---	-47	-47
B. Extenders Relating to Multiemployer Defined Benefit Pension Plans														
1. Multiemployer defined benefit plans (sunset 12/31/15) [11].....	pyba & asa 12/31/14	----- <i>Gain of less than \$500,000</i> -----												
Total of Provisions Expiring in 2014.....		---	-30	-16	---	---	---	---	---	---	---	---	-47	-47
III. Sense of the Senate To Express Support for Comprehensive Tax Reform.....														
	DOE	----- <i>No Revenue Effect</i> -----												
IV. Provisions That Raise Revenue														
1. Allow Treasury to levy up to 100 percent of a payment made to a Medicare provider to collect unpaid taxes.....	pmsma DOE	---	57	78	80	81	83	84	86	88	90	91	379	818
2. Exclude grants and awards for Clean Coal Power Initiative from gross income.....	pri tyba 12/31/11	-35	-60	-52	-28	8	41	47	34	24	17	8	-126	4
3. Extend paid preparer EITC due diligence requirements to the child tax credit [9].....	tyba 12/31/14	---	[7]	5	5	5	5	5	5	5	5	5	19	43
Total of Provisions That Raise Revenue.....		-35	-3	31	57	94	129	136	125	117	112	104	272	865
NET TOTAL		-24,204	-111,524	-15,795	31,249	19,257	12,849	6,665	1,701	-549	-2,224	-2,729	-88,169	-85,306

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be July 1, 2014.

[Legend and Footnotes for JCX-32-14 appear on the following page]

