13. TAX EXPENDITURES

The Congressional Budget Act of 1974 (Public Law 93–344) requires that a list of "tax expenditures" be included in the budget. Tax expenditures are defined in the law as "revenue losses attributable to provisions of the Federal tax laws which allow a special exclusion, exemption, or deduction from gross income or which provide a special credit, a preferential rate of tax, or a deferral of tax liability." These exceptions may be viewed as alternatives to other policy instruments, such as spending or regulatory programs.

Identification and measurement of tax expenditures depends crucially on the baseline tax system against which the actual tax system is compared. The tax expenditure estimates presented in this document are patterned on a comprehensive income tax, which defines income as the sum of consumption and the change in net wealth in a given period of time.

An important assumption underlying each tax expenditure estimate reported below is that other parts of the Tax Code remain unchanged. The estimates would be different if tax expenditures were changed simultaneously because of potential interactions among provisions. For that reason, this document does not present a grand total for the estimated tax expenditures.

Tax expenditures relating to the individual and corporate income taxes are estimated for fiscal years 2017–2027 using two methods of accounting: current revenue effects and present value effects. The present value approach provides estimates of the revenue effects for tax expenditures that generally involve deferrals of tax payments into the future.

TAX EXPENDITURES IN THE INCOME TAX

Tax Expenditure Estimates

All tax expenditure estimates and descriptions presented here are based upon current tax law enacted as of July 1, 2017 and reflect the economic assumptions from the Mid-Session Review of the 2017 Budget. In some cases, expired or repealed provisions are listed if their revenue effects occur in fiscal year 2017 or later.

The total revenue effects for tax expenditures for fiscal years 2017–2027 are displayed according to the Budget's functional categories in Table 1. Descriptions of the specific tax expenditure provisions follow the discussion of general features of the tax expenditure concept.

Two baseline concepts—the normal tax baseline and the reference tax law baseline—are used to identify and estimate tax expenditures.[1] For the most part, the two concepts coincide. However, items treated as tax expenditures under the normal tax baseline, but not the reference tax law baseline, are indicated by the designation "normal tax method" in the tables. The revenue effects for these items are zero using the reference tax rules. The alternative baseline concepts are discussed in detail below.

Tables 2A and 2B report separately the respective portions of the total revenue effects that arise under the individual and corporate income taxes. The location of the estimates under the individual and corporate headings does not imply that these categories of filers benefit from the special tax provisions in proportion to the respective tax expenditure amounts shown. Rather, these breakdowns show the form of tax liability that the various provisions affect. The ultimate beneficiaries of corporate tax expenditures could be shareholders, employees, customers, or other providers of capital, depending on economic forces.

Table 3 ranks the major tax expenditures by the size of their 2018–2027 revenue effect. The first column provides the number of the provision in order to cross reference this table to Tables 1, 2A, and 2B, as well as to the descriptions below.

Interpreting Tax Expenditure Estimates

The estimates shown for individual tax expenditures in Tables 1 through 3 do not necessarily equal the increase in Federal revenues (or the change in the budget balance) that would result from repealing these special provisions, for the following reasons.

First, eliminating a tax expenditure may have incentive effects that alter economic behavior. These incentives can affect the resulting magnitudes of the activity or of other tax provisions or Government programs. For example, if capital gains were taxed at ordinary rates, capital gain realizations would be expected to decline, resulting in lower tax receipts. Such behavioral effects are not reflected in the estimates.

Second, tax expenditures are interdependent even without incentive effects. Repeal of a tax expenditure provision can increase or decrease the tax revenues associated with other provisions. For example, even if behavior

[1] These baseline concepts are thoroughly discussed in Special Analysis G of the 1985 Budget, where the former is referred to as the pre-1983 method and the latter the post-1982 method.

does not change, repeal of an itemized deduction could increase the revenue costs from other deductions because some taxpayers would be moved into higher tax brackets. Alternatively, repeal of an itemized deduction could lower the revenue cost from other deductions if taxpayers are led to claim the standard deduction instead of itemizing. Similarly, if two provisions were repealed simultaneously, the increase in tax liability could be greater or less than the sum of the two separate tax expenditures, because each is estimated assuming that the other remains in force. In addition, the estimates reported in Table 1 are the totals of individual and corporate income tax revenue effects reported in Tables 2A and 2B, and do not reflect any possible interactions between individual and corporate income tax receipts. For this reason, the estimates in Table 1 should be regarded as approximations.

Present-Value Estimates

The annual value of tax expenditures for tax deferrals is reported on a cash basis in all tables except Table 4. Cash-based estimates reflect the difference between taxes deferred in the current year and incoming revenues that are received due to deferrals of taxes from prior years. Although such estimates are useful as a measure of cash flows into the Government, they do not accurately reflect the true economic cost of these provisions. For example, for a provision where activity levels have changed over time, so that incoming tax receipts from past deferrals are greater than deferred receipts from new activity, the cash-basis tax expenditure estimate can be negative, despite the fact that in present-value terms current deferrals have a real cost to the Government. Alternatively, in the case of a newly enacted deferral provision, a cash-based estimate can overstate the real effect on receipts to the Government because the newly deferred taxes will ultimately be received.

Discounted present-value estimates of revenue effects are presented in Table 4 for certain provisions that involve tax deferrals or other long-term revenue effects. These estimates complement the cash-based tax expenditure estimates presented in the other tables.

The present-value estimates represent the revenue effects, net of future tax payments that follow from activities undertaken during calendar year 2017 which cause the deferrals or other long-term revenue effects. For instance, a pension contribution in 2017 would cause a deferral of tax payments on wages in 2017 and on pension fund earnings on this contribution (e.g., interest) in later years. In some future year, however, the 2017 pension contribution and accrued earnings will be paid out and taxes will be due; these receipts are included in the present-value estimate. In general, this conceptual approach is similar to the one used for reporting the budgetary effects of credit programs, where direct loans and guarantees in a given year affect future cash flows.

Tax Expenditure Baselines

A tax expenditure is an exception to baseline provisions of the tax structure that usually results in a reduction in the amount of tax owed. The 1974 Congressional Budget Act, which mandated the tax expenditure budget, did not specify the baseline provisions of the tax law. As noted previously, deciding whether provisions are exceptions, therefore, is a matter of judgment. As in prior years, most of this year's tax expenditure estimates are presented using two baselines: the normal tax baseline and the reference tax law baseline. Tax expenditures may take the form of credits, deductions, special exceptions and allowances.

The normal tax baseline is patterned on a practical variant of a comprehensive income tax, which defines income as the sum of consumption and the change in net wealth in a given period of time. The normal tax baseline allows personal exemptions, a standard deduction, and deduction of expenses incurred in earning income. It is not limited to a particular structure of tax rates, or by a specific definition of the taxpaying unit.

The reference tax law baseline is also patterned on a comprehensive income tax, but it is closer to existing law. Reference law tax expenditures are limited to special exceptions from a generally provided tax rule that serve programmatic functions in a way that is analogous to spending programs. Provisions under the reference law baseline are generally tax expenditures under the normal tax baseline, but the reverse is not always true.

Both the normal and reference tax baselines allow several major departures from a pure comprehensive income tax. For example, under the normal and reference tax baselines:

- Income is taxable only when it is realized in exchange. Thus, the deferral of tax on unrealized capital gains is not regarded as a tax expenditure. Accrued income would be taxed under a comprehensive income tax.
- There is a separate corporate income tax.
- Tax rates on noncorporate business income vary by level of income.
- Individual tax rates, including brackets, standard deduction, and personal exemptions, are allowed to vary with marital status.
- Values of assets and debt are not generally adjusted for inflation. A comprehensive income tax would adjust the cost basis of capital assets and debt for changes in the general price level. Thus, under a comprehensive income tax baseline, the failure to take account of inflation in measuring depreciation, capital gains, and interest income would be regarded as a negative tax expenditure (i.e., a tax penalty), and failure to take account of inflation in measuring

interest costs would be regarded as a positive tax expenditure (i.e., a tax subsidy).

Although the reference law and normal tax baselines are generally similar, areas of difference include:

Tax rates. The separate schedules applying to the various taxpaying units are included in the reference law baseline. Thus, corporate tax rates below the maximum statutory rate do not give rise to a tax expenditure. The normal tax baseline is similar, except that, by convention, it specifies the current maximum rate as the baseline for the corporate income tax. The lower tax rates applied to the first $10 million of corporate income are thus regarded as a tax expenditure under the normal tax. By convention, the Alternative Minimum Tax is treated as part of the baseline rate structure under both the reference and normal tax methods.

Income subject to the tax. Income subject to tax is defined as gross income less the costs of earning that income. Under the reference tax rules, gross income does not include gifts defined as receipts of money or property that are not consideration in an exchange nor does gross income include most transfer payments from the Government.[2] The normal tax baseline also excludes gifts between individuals from gross income. Under the normal tax baseline, however, all cash transfer payments from the Government to private individuals are counted in gross income, and exemptions of such transfers from tax are identified as tax expenditures. The costs of earning income are generally deductible in determining taxable income under both the reference and normal tax baselines.[3]

Capital recovery. Under the reference tax law baseline no tax expenditures arise from accelerated depreciation. Under the normal tax baseline, the depreciation allowance for property is computed using estimates of economic depreciation.

Treatment of foreign income. Both the normal and reference tax baselines allow a tax credit for foreign income taxes paid (up to the amount of U.S. income taxes that would otherwise be due), which prevents double taxation of income earned abroad. Under the normal tax method, however, controlled foreign corporations (CFCs) are not regarded as entities separate from their controlling U.S. shareholders. Thus, the deferral of tax on income received by CFCs is regarded as a tax expenditure under this method. In contrast, except for tax haven activities, the reference law baseline follows current law in treating CFCs as separate taxable entities whose income is not subject to U.S. tax until distributed to U.S. taxpayers. Under this baseline, deferral of tax on CFC income is not a tax expenditure because U.S. taxpayers generally are not taxed on accrued, but unrealized, income.

As illustrated in the Fiscal year 2004 Tax expenditure Budget, provisions defined as tax expenditures in this Budget would be different if a pure comprehensive income tax were employed as the baseline. Similarly, they would also look quite different if a consumption tax were employed; the current income tax can be considered as a hybrid tax with income and consumption tax features. Comprehensive income, also called Haig-Simons income, is the real, inflation adjusted, accretions to wealth, accrued or realized. Using a comprehensive income tax baseline, the tax base can be larger than that considered here. A broad-based consumption tax is a combination of an income tax plus a deduction for net saving, or just consumption plus the change in net worth. Under this baseline, some of the current tax provisions would no longer be considered as tax expenditures (e.g. retirement savings). Because of the dramatic changes in the tax system introduced by the Tax Cuts and Jobs Act of 2017, the Fiscal Year 2020 Budget will update the earlier analysis of 2004 using the new law with its modified tax base and new tax rate structure.

Descriptions of Income Tax Provisions

Descriptions of the individual and corporate income tax expenditures reported on in this document follow. These descriptions relate to current law as of July 1, 2017. The estimates provided below do not reflect the effect of changes introduced by the Tax Cuts and Jobs Act (TCJA), signed into law on December 22, 2017. Given its late date of enactment, these effects will be reflected in the estimates reported in the FY 2020 Budget. Under the Act, a number of provisions were scaled back, expanded, and repealed, or newly introduced. Provisions otherwise untouched directly by the Act were also affected by the modification of the individual tax rate schedule and reduction of corporate tax rates. Below is a brief summary of how TCJA affected tax expenditure provisions, with the Receipts Chapter providing an expanded listing and description.

For individuals, the Act expanded the child tax credit, the deduction for charitable contributions and certain tax preferences for education. It scaled back the deduction for state and local taxes, the mortgage interest deduction, and certain fringe benefits. It also repealed the moving expense deduction and exclusion for non-military taxpayers. For businesses, the Act expanded depreciation allowances and scaled back on the benefit of deferral of gains in like-kind exchanges. It also altered the tax treatment of foreign earnings of US multinational corporations by switching from a global to a territorial tax system. The Act also scaled back the benefit extended to municipal bonds by disallowing advanced refunding, as well as repealing tax credit bonds.

[2] Gross income does, however, include transfer payments associated with past employment, such as Social Security benefits.

[3] In the case of individuals who hold "passive" equity interests in businesses, the pro-rata shares of sales and expense deductions reportable in a year are limited. A passive business activity is defined generally to be one in which the holder of the interest, usually a partnership interest, does not actively perform managerial or other participatory functions. The taxpayer may generally report no larger deductions for a year than will reduce taxable income from such activities to zero. Deductions in excess of the limitation may be taken in subsequent years, or when the interest is liquidated. In addition, costs of earning income may be limited under the Alternative Minimum Tax.

Table 13–1. ESTIMATES OF TOTAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027

(In millions of dollars)

	Total from corporations and individuals											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
National Defense:												
1 Exclusion of benefits and allowances to armed forces personnel	12,400	12,830	11,640	11,680	12,040	12,520	13,040	13,590	14,190	14,820	15,490	131,840
International affairs:												
2 Exclusion of income earned abroad by U.S. citizens	6,600	6,930	7,280	7,640	8,020	8,420	8,840	9,290	9,750	10,240	10,750	87,160
3 Exclusion of certain allowances for Federal employees abroad	1,370	1,430	1,510	1,580	1,660	1,740	1,830	1,920	2,020	2,120	2,230	18,040
4 Inventory property sales source rules exception	3,320	3,570	3,840	4,170	4,480	4,760	5,070	5,410	5,780	6,180	6,640	49,900
5 Deferral of income from controlled foreign corporations (normal tax method)	107,200	112,560	118,190	124,100	130,310	136,820	143,660	150,850	158,390	166,310	174,620	1,415,810
6 Deferred taxes for financial firms on certain income earned overseas	16,080	16,880	17,730	18,620	19,550	20,520	21,550	22,630	23,760	24,950	26,190	212,380
General science, space, and technology:												
7 Expensing of research and experimentation expenditures (normal tax method)	8,330	8,340	9,140	10,100	10,910	11,640	12,310	13,040	13,820	14,660	15,540	119,500
8 Credit for increasing research activities	11,500	12,250	13,010	13,820	14,680	15,600	16,580	17,630	18,730	19,900	21,140	163,340
Energy:												
9 Expensing of exploration and development costs, fuels	–650	–290	–30	120	200	260	290	290	300	350	370	1,860
10 Excess of percentage over cost depletion, fuels	440	550	600	640	700	830	990	1,110	1,210	1,360	1,510	9,500
11 Exception from passive loss limitation for working interests in oil and gas properties	20	20	20	20	20	30	30	30	30	30	30	260
12 Capital gains treatment of royalties on coal	140	160	150	140	150	150	160	160	170	180	190	1,610
13 Exclusion of interest on energy facility bonds	10	10	10	10	10	10	10	30	30	30	30	180
14 Enhanced oil recovery credit	270	350	400	450	440	460	500	530	510	490	440	4,570
15 Energy production credit [1]	1,590	2,230	2,870	3,430	3,880	4,280	4,600	4,790	4,850	4,750	4,440	40,120
16 Marginal wells credit	70	110	70	30	30	40	100	140	180	210	230	1,140
17 Energy investment credit [1]	1,850	3,410	3,470	3,330	3,330	2,710	1,630	670	80	–120	–150	18,360
18 Alcohol fuel credits [2]	20	0	0	0	0	0	0	0	0	0	0	0
19 Bio-Diesel and small agri-biodiesel producer tax credits [3]	40	0	0	0	0	0	0	0	0	0	0	0
20 Tax credits for clean-fuel burning vehicles and refueling property	590	680	670	490	360	330	280	240	180	130	100	3,460
21 Exclusion of utility conservation subsidies	470	490	520	540	570	590	620	650	680	710	750	6,120
22 Credit for holding clean renewable energy bonds [4]	70	70	70	70	70	70	70	70	70	70	70	700
23 Deferral of gain from dispositions of transmission property to implement FERC restructuring policy	–190	–270	–210	–190	–150	–120	–70	–20	0	0	0	–1,030
24 Credit for investment in clean coal facilities	140	110	100	250	320	190	20	–20	–10	–10	–10	940
25 Temporary 50% expensing for equipment used in the refining of liquid fuels	–1,380	–1,140	–930	–740	–560	–370	–180	–40	0	0	0	–3,960
26 Natural gas distribution pipelines treated as 15-year property	140	150	150	150	120	60	–20	–100	–190	–270	–320	–270
27 Amortize all geological and geophysical expenditures over 2 years	70	60	70	70	70	80	70	60	40	40	50	610
28 Allowance of deduction for certain energy efficient commercial building property	30	–10	–30	–30	–30	–30	–30	–30	–30	–30	–30	–280
29 Credit for construction of new energy efficient homes	170	70	10	0	0	0	0	0	0	0	0	80
30 Credit for energy efficiency improvements to existing homes	290	0	0	0	0	0	0	0	0	0	0	0
31 Credit for residential energy efficient property	1,430	1,380	1,360	1,250	1,060	530	120	20	0	0	0	5,720
32 Qualified energy conservation bonds [5]	30	30	30	30	30	30	30	30	30	30	30	300
33 Advanced Energy Property Credit	50	0	–20	–20	–10	–10	0	0	0	0	0	–60
34 Advanced nuclear power production credit	0	0	170	440	550	550	550	550	550	550	550	4,460
35 Reduced tax rate for nuclear decommissioning funds	210	230	240	260	270	280	290	310	320	340	350	2,890
Natural resources and environment:												
36 Expensing of exploration and development costs, nonfuel minerals	40	50	50	50	50	50	50	50	50	50	50	500
37 Excess of percentage over cost depletion, nonfuel minerals	140	140	150	150	150	150	150	150	140	140	140	1,460
38 Exclusion of interest on bonds for water, sewage, and hazardous waste facilities	420	410	420	420	450	500	540	580	610	650	680	5,260

Table 13–1. ESTIMATES OF TOTAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017–2027—Continued

(In millions of dollars)

		Total from corporations and individuals											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
39	Capital gains treatment of certain timber income	140	160	150	140	150	150	160	160	170	180	190	1,610
40	Expensing of multiperiod timber growing costs	340	350	350	360	370	400	400	410	410	420	420	3,890
41	Tax incentives for preservation of historic structures	500	510	520	530	540	550	560	570	590	600	610	5,580
42	Industrial CO_2 capture and sequestration tax credit	190	200	200	0	0	0	0	0	0	0	0	400
43	Deduction for endangered species recovery expenditures	30	30	30	40	50	50	50	50	70	70	80	520
Agriculture:													
44	Expensing of certain capital outlays	190	200	210	220	240	250	260	270	280	290	300	2,520
45	Expensing of certain multiperiod production costs	310	320	330	340	350	370	390	410	420	440	450	3,820
46	Treatment of loans forgiven for solvent farmers	40	50	50	50	50	50	60	60	60	60	70	560
47	Capital gains treatment of certain income	1,360	1,550	1,470	1,450	1,480	1,520	1,580	1,640	1,720	1,800	1,890	16,100
48	Income averaging for farmers	140	150	160	170	180	180	190	200	210	220	230	1,890
49	Deferral of gain on sale of farm refiners	20	20	20	20	20	20	20	20	20	30	30	220
50	Expensing of reforestation expenditures	60	50	60	60	60	70	70	80	80	80	80	690
Commerce and housing:													
	Financial institutions and insurance:												
51	Exemption of credit union income	2,918	2,901	3,053	3,113	3,246	3,450	3,648	3,839	3,967	4,170	4,372	35,759
52	Exclusion of life insurance death benefits	14,750	15,450	16,290	17,210	18,500	19,810	20,970	22,070	23,220	24,420	25,560	203,500
53	Exemption or special alternative tax for small property and casualty insurance companies	50	50	60	60	60	60	70	70	80	80	80	670
54	Tax exemption of insurance income earned by tax-exempt organizations	720	750	790	840	890	920	950	980	1,000	1,030	1,060	9,210
55	Small life insurance company deduction	30	30	30	30	40	40	40	40	40	40	50	380
56	Exclusion of interest spread of financial institutions	160	240	280	290	300	310	320	330	340	350	360	3,120
	Housing:												
57	Exclusion of interest on owner-occupied mortgage subsidy bonds	1,150	1,120	1,150	1,160	1,230	1,360	1,490	1,620	1,710	1,790	1,860	14,490
58	Exclusion of interest on rental housing bonds	1,060	1,040	1,070	1,080	1,140	1,260	1,370	1,490	1,580	1,650	1,710	13,390
59	Deductibility of mortgage interest on owner-occupied homes	65,600	69,130	74,510	81,330	89,030	96,840	104,490	111,810	118,900	125,560	131,630	1,003,230
60	Deductibility of State and local property tax on owner-occupied homes	33,710	35,790	38,190	40,920	43,750	46,600	49,550	52,700	55,940	59,230	62,680	485,350
61	Deferral of income from installment sales	1,590	1,760	1,700	1,690	1,730	1,770	1,830	1,900	1,970	2,050	2,140	18,540
62	Capital gains exclusion on home sales	43,220	43,870	44,550	45,380	46,160	46,870	47,710	48,630	49,500	50,370	51,280	474,320
63	Exclusion of net imputed rental income	121,350	126,000	131,110	136,680	142,590	148,830	155,330	162,180	169,480	177,100	185,370	1,534,670
64	Exception from passive loss rules for $25,000 of rental loss	7,410	7,710	8,060	8,390	8,730	9,080	9,440	9,750	10,100	10,490	10,860	92,610
65	Credit for low-income housing investments	8,310	8,410	8,960	9,090	9,270	9,480	9,720	9,990	10,270	10,600	10,920	96,710
66	Accelerated depreciation on rental housing (normal tax method)	2,090	2,680	3,510	4,370	5,050	5,860	6,660	7,410	8,130	8,810	9,470	61,950
67	Discharge of mortgage indebtedness	310	0	0	0	0	0	0	0	0	0	0	0
	Commerce:												
68	Discharge of business indebtedness	–70	0	10	0	10	30	40	40	40	40	50	260
69	Exceptions from imputed interest rules	60	60	60	70	70	80	80	80	90	90	100	780
70	Treatment of qualified dividends	27,550	29,130	30,700	32,460	34,420	36,580	38,940	41,500	44,310	47,290	50,440	385,770
71	Capital gains (except agriculture, timber, iron ore, and coal)	101,510	115,910	109,880	107,970	110,230	113,500	117,650	122,620	128,280	134,450	141,100	1,201,590
72	Capital gains exclusion of small corporation stock	790	1,020	1,240	1,400	1,520	1,630	1,730	1,830	1,900	1,980	2,050	16,300
73	Step-up basis of capital gains at death	37,910	38,710	39,560	40,160	40,560	41,240	41,860	42,620	43,230	43,820	44,540	416,300
74	Carryover basis of capital gains on gifts	5,190	4,840	4,670	4,560	4,530	4,530	4,560	4,640	4,700	4,730	4,780	46,540
75	Ordinary income treatment of loss from small business corporation stock sale	70	80	80	80	80	80	90	90	90	100	100	870
76	Deferral of gains from like-kind exchanges	7,690	8,080	8,500	8,920	9,360	9,830	10,320	10,840	11,380	11,940	12,490	101,660
77	Depreciation of buildings other than rental housing (normal tax method)	–8,800	–8,970	–9,570	–10,250	–10,770	–11,360	–11,990	–12,690	–13,130	–13,510	–13,980	–116,220
78	Accelerated depreciation of machinery and equipment (normal tax method)	44,300	36,740	26,380	–9,310	–9,550	5,100	14,730	23,590	31,120	37,050	42,050	197,900
79	Expensing of certain small investments (normal tax method)	3,410	3,400	3,710	7,540	7,910	6,970	6,740	6,700	6,770	7,020	7,230	63,990

Table 13–1. ESTIMATES OF TOTAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017–2027—Continued

(In millions of dollars)

		Total from corporations and individuals											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
80	Graduated corporation income tax rate (normal tax method)	1,550	1,510	1,440	1,430	1,350	1,330	1,280	1,250	1,180	1,180	1,150	13,100
81	Exclusion of interest on small issue bonds	140	150	140	140	160	180	190	200	220	220	240	1,840
82	Deduction for US production activities	13,520	14,150	14,790	15,500	16,280	17,090	17,950	18,850	19,790	20,790	21,830	177,020
83	Special rules for certain film and TV production	200	110	60	30	0	0	0	0	0	0	0	200
Transportation:													
84	Tonnage tax	80	80	90	90	90	100	100	110	110	120	130	1,020
85	Deferral of tax on shipping companies	20	20	20	20	20	20	20	20	20	20	20	200
86	Exclusion of reimbursed employee parking expenses	3,202	3,319	3,452	3,582	3,731	3,862	3,971	4,117	4,257	4,404	4,571	39,266
87	Exclusion for employer-provided transit passes	1,123	1,192	1,270	1,355	1,446	1,532	1,613	1,719	1,819	1,934	2,054	15,934
88	Tax credit for certain expenditures for maintaining railroad tracks	60	0	0	0	0	0	0	0	0	0	0	0
89	Exclusion of interest on bonds for Highway Projects and rail-truck transfer facilities	200	190	170	170	160	160	140	140	130	130	120	1,510
Community and regional development:													
90	Investment credit for rehabilitation of structures (other than historic)	20	20	20	20	20	20	20	20	20	20	20	200
91	Exclusion of interest for airport, dock, and similar bonds	660	650	660	680	720	790	860	930	990	1,040	1,080	8,400
92	Exemption of certain mutuals' and cooperatives' income	150	150	150	160	160	160	170	170	180	180	190	1,670
93	Empowerment zones	110	50	30	30	10	10	10	0	0	0	0	140
94	New markets tax credit	1,460	1,410	1,320	1,280	1,210	1,090	880	570	290	80	–120	8,010
95	Credit to holders of Gulf Tax Credit Bonds.	240	250	270	300	320	350	380	400	420	430	440	3,560
96	Recovery Zone Bonds [6]	130	140	150	160	180	190	210	220	230	240	250	1,970
97	Tribal Economic Development Bonds	40	40	40	50	50	60	60	70	70	70	80	590
Education, training, employment, and social services:													
	Education:												
98	Exclusion of scholarship and fellowship income (normal tax method)	3,300	3,410	3,490	3,650	3,800	3,970	4,140	4,310	4,500	4,690	4,890	40,850
99	Tax credits and deductions for postsecondary education expenses [7]	16,460	16,360	16,320	16,310	16,290	16,190	16,180	16,170	16,120	16,020	15,980	161,940
100	Education Individual Retirement Accounts	30	30	40	40	40	40	40	40	30	30	30	360
101	Deductibility of student-loan interest	2,340	2,360	2,390	2,500	2,510	2,520	2,610	2,610	2,630	2,650	2,670	25,450
102	Qualified tuition programs	1,950	2,140	2,330	2,530	2,730	2,940	3,150	3,380	3,600	3,830	4,070	30,700
103	Exclusion of interest on student-loan bonds	370	370	370	380	400	440	480	520	550	580	600	4,690
104	Exclusion of interest on bonds for private nonprofit educational facilities	2,250	2,200	2,260	2,280	2,410	2,660	2,900	3,160	3,330	3,510	3,640	28,350
105	Credit for holders of zone academy bonds [8]	170	180	170	150	130	110	90	80	60	50	50	1,070
106	Exclusion of interest on savings bonds redeemed to finance educational expenses	30	30	30	30	40	40	40	40	50	50	50	400
107	Parental personal exemption for students age 19 or over	9,600	9,500	9,490	9,500	9,540	9,590	9,630	9,670	9,700	9,770	9,940	96,330
108	Deductibility of charitable contributions (education)	5,480	5,890	6,330	6,730	7,100	7,490	7,860	8,250	8,630	9,000	9,370	76,650
109	Exclusion of employer-provided educational assistance	900	940	990	1,040	1,100	1,150	1,210	1,270	1,340	1,400	1,480	11,920
110	Special deduction for teacher expenses	200	210	200	210	250	250	250	260	260	260	270	2,420
111	Discharge of student loan indebtedness	100	100	100	110	110	110	110	120	120	120	120	1,120
112	Qualified school construction bonds [9]	650	650	650	650	650	650	650	650	650	650	650	6,500
	Training, employment, and social services:												
113	Work opportunity tax credit	1,320	1,340	1,370	990	490	310	230	180	130	100	70	5,210
114	Employer provided child care exclusion	900	900	940	970	1,000	1,030	1,060	1,100	1,140	1,180	1,220	10,540
115	Employer-provided child care credit	10	10	10	10	10	10	10	10	10	10	10	100
116	Assistance for adopted foster children	590	620	660	690	730	780	820	860	910	950	1,000	8,020
117	Adoption credit and exclusion	620	620	650	620	640	690	690	710	690	710	720	6,740
118	Exclusion of employee meals and lodging (other than military)	4,830	4,990	5,150	5,290	5,440	5,590	5,750	5,910	6,060	6,220	6,380	56,780
119	Credit for child and dependent care expenses	4,600	4,690	4,790	4,890	4,960	5,060	5,140	5,220	5,300	5,370	5,440	50,860
120	Credit for disabled access expenditures	10	10	10	10	10	10	10	10	10	10	10	100
121	Deductibility of charitable contributions, other than education and health	47,760	51,720	55,030	58,590	61,930	65,250	68,510	71,820	75,090	78,270	81,870	668,080
122	Exclusion of certain foster care payments	490	510	530	550	570	590	610	620	640	660	680	5,960

Table 13–1. ESTIMATES OF TOTAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017–2027—Continued

(In millions of dollars)

		Total from corporations and individuals											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
123	Exclusion of parsonage allowances	920	970	1,021	1,075	1,132	1,192	1,255	1,322	1,392	1,465	1,543	12,367
124	Indian employment credit	40	20	20	20	20	10	10	10	10	10	10	140
125	Credit for employer differential wage payments	0	0	10	10	10	20	20	20	20	20	20	150
Health:													
126	Exclusion of employer contributions for medical insurance premiums and medical care [10]	214,280	227,880	242,880	257,390	273,180	291,180	309,500	328,620	349,300	370,360	393,430	3,043,720
127	Self-employed medical insurance premiums	8,140	8,170	7,750	8,010	8,460	8,830	9,220	9,640	10,110	10,610	11,170	91,970
128	Medical Savings Accounts / Health Savings Accounts	8,240	9,400	10,650	11,730	12,750	13,820	14,830	15,770	16,720	17,700	18,730	142,100
129	Deductibility of medical expenses	9,720	10,030	10,870	11,850	12,840	13,790	14,790	15,830	16,910	18,090	19,400	144,400
130	Exclusion of interest on hospital construction bonds	3,380	3,310	3,400	3,430	3,630	4,000	4,370	4,740	5,010	5,260	5,470	42,620
131	Refundable Premium Assistance Tax Credit [11]	5,630	6,310	7,100	7,740	8,380	8,910	9,370	10,040	10,590	11,390	12,140	91,970
132	Credit for employee health insurance expenses of small business [12]	90	80	70	50	30	20	10	10	10	10	10	300
133	Deductibility of charitable contributions (health)	5,120	5,530	5,960	6,350	6,710	7,080	7,430	7,790	8,150	8,500	8,860	72,360
134	Tax credit for orphan drug research	2,280	2,760	3,340	4,030	4,880	5,900	7,140	8,630	10,450	12,630	15,290	75,050
135	Special Blue Cross/Blue Shield tax benefits	590	610	630	670	700	740	780	820	870	910	960	7,690
136	Tax credit for health insurance purchased by certain displaced and retired individuals [13]	30	20	10	0	0	0	0	0	0	0	0	30
137	Distributions from retirement plans for premiums for health and long-term care insurance	460	480	500	520	540	560	580	600	620	650	670	5,720
Income security:													
138	Child credit [14]	24,340	24,270	23,960	23,580	23,140	22,690	22,270	21,860	21,410	20,980	20,610	224,770
139	Exclusion of railroad retirement (Social Security equivalent) benefits	290	280	280	270	260	250	240	220	210	190	170	2,370
140	Exclusion of workers' compensation benefits	9,970	10,040	10,110	10,180	10,250	10,320	10,390	10,470	10,540	10,610	10,690	103,600
141	Exclusion of public assistance benefits (normal tax method)	590	600	620	640	670	680	700	730	740	750	660	6,790
142	Exclusion of special benefits for disabled coal miners	20	20	20	20	20	10	10	10	10	10	10	140
143	Exclusion of military disability pensions	170	180	180	190	190	200	200	210	210	220	220	2,000
	Net exclusion of pension contributions and earnings:												
144	Defined benefit employer plans	76,091	76,998	77,341	78,453	77,081	75,678	73,516	71,376	68,657	65,592	61,673	726,365
145	Defined contribution employer plans	69,440	71,270	80,480	87,010	89,310	95,400	112,200	122,030	126,140	130,240	137,820	1,051,900
146	Individual Retirement Accounts	17,320	19,110	20,630	22,180	23,790	25,460	27,100	28,150	29,080	29,880	30,640	256,020
147	Low and moderate income savers credit	1,440	1,470	1,470	1,460	1,440	1,440	1,440	1,440	1,420	1,450	1,430	14,460
148	Self-Employed plans	28,460	26,980	30,010	33,390	36,930	40,280	44,000	48,070	52,400	57,060	62,170	431,290
	Exclusion of other employee benefits:												
149	Premiums on group term life insurance	3,350	3,140	3,250	3,370	3,500	3,630	3,770	3,910	4,070	4,230	4,390	37,260
150	Premiums on accident and disability insurance	330	330	330	330	340	340	340	350	350	350	350	3,410
151	Income of trusts to finance supplementary unemployment benefits	20	30	40	40	50	50	50	50	60	60	60	490
152	Income of trusts to finance voluntary employee benefits associations	1,180	1,240	1,290	1,350	1,420	1,480	1,550	1,630	1,710	1,780	1,860	15,310
153	Special ESOP rules	2,080	2,140	2,210	2,280	2,360	2,430	2,510	2,580	2,660	2,740	2,820	24,730
154	Additional deduction for the blind	30	30	30	30	40	40	40	50	50	60	60	430
155	Additional deduction for the elderly	3,470	3,770	4,050	4,380	4,780	5,090	5,470	5,850	6,290	6,810	7,380	53,870
156	Tax credit for the elderly and disabled	10	10	10	0	0	0	0	0	0	0	0	20
157	Deductibility of casualty losses	330	350	380	400	430	460	500	530	560	590	630	4,830
158	Earned income tax credit [15]	1,760	1,810	3,960	4,100	2,060	2,150	2,250	2,370	2,500	2,570	2,700	26,470
Social Security:													
	Exclusion of social security benefits:												
159	Social Security benefits for retired and disabled workers and spouses, dependents and survivors	34,500	36,110	37,660	39,430	41,430	43,840	46,830	48,780	50,130	53,690	57,850	455,750
160	Credit for certain employer contributions to social security	1,040	1,080	1,130	1,190	1,250	1,310	1,380	1,440	1,520	1,590	1,680	13,570
Veterans benefits and services:													
161	Exclusion of veterans death benefits and disability compensation	7,920	8,620	9,190	9,560	9,910	10,290	10,680	11,090	11,520	11,960	12,440	105,260
162	Exclusion of veterans pensions	480	510	540	560	580	610	630	660	690	720	750	6,250

Table 13–1. ESTIMATES OF TOTAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017–2027—Continued

(In millions of dollars)

		Total from corporations and individuals											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
163	Exclusion of GI bill benefits	1,740	1,830	1,910	2,010	2,110	2,220	2,330	2,440	2,570	2,700	2,840	22,960
164	Exclusion of interest on veterans housing bonds	10	10	10	10	10	10	10	30	30	30	30	180
General purpose fiscal assistance:													
165	Exclusion of interest on public purpose State and local bonds	28,560	27,920	28,650	28,950	30,680	33,830	36,880	40,060	42,290	44,470	46,160	359,890
166	Build America Bonds [16]	0	0	0	0	0	0	0	0	0	0	0	0
167	Deductibility of nonbusiness State and local taxes other than on owner-occupied homes	70,420	74,980	80,190	86,220	91,900	97,460	103,350	109,610	116,020	122,310	128,980	1,011,020
Interest:													
168	Deferral of interest on U.S. savings bonds	960	950	940	930	930	920	910	900	890	880	890	9,140
Addendum: Aid to State and local governments:													
	Deductibility of:												
	Property taxes on owner-occupied homes	33,710	35,790	38,190	40,920	43,750	46,600	49,550	52,700	55,940	59,230	62,680	485,350
	Nonbusiness State and local taxes other than on owner-occupied homes	70,420	74,980	80,190	86,220	91,900	97,460	103,350	109,610	116,020	122,310	128,980	1,011,020
	Exclusion of interest on State and local bonds for:												
	Public purposes	28,560	27,920	28,650	28,950	30,680	33,830	36,880	40,060	42,290	44,470	46,160	359,890
	Energy facilities	10	10	10	10	10	10	10	30	30	30	30	180
	Water, sewage, and hazardous waste disposal facilities	420	410	420	420	450	500	540	580	610	650	680	5,260
	Small-issues	140	150	140	140	160	180	190	200	220	220	240	1,840
	Owner-occupied mortgage subsidies	1,150	1,120	1,150	1,160	1,230	1,360	1,490	1,620	1,710	1,790	1,860	14,490
	Rental housing	1,060	1,040	1,070	1,080	1,140	1,260	1,370	1,490	1,580	1,650	1,710	13,390
	Airports, docks, and similar facilities	660	650	660	680	720	790	860	930	990	1,040	1,080	8,400
	Student loans	370	370	370	380	400	440	480	520	550	580	600	4,690
	Private nonprofit educational facilities	2,250	2,200	2,260	2,280	2,410	2,660	2,900	3,160	3,330	3,510	3,640	28,350
	Hospital construction	3,380	3,310	3,400	3,430	3,630	4,000	4,370	4,740	5,010	5,260	5,470	42,620
	Veterans' housing	10	10	10	10	10	10	10	30	30	30	30	180

[1] Firms can take an energy grant in lieu of the energy production credit or the energy investment credit for facilities whose construction began in 2009, 2010, or 2011. The effect of the grant on outlays (in millions of dollars) is as follows: 2017 $1,100; 2018 $50; and $0 thereafter.

[2] The alternative fuel mixture credit results in a reduction in excise tax receipts (in millions of dollars) as follows: 2017 $420 and $0 thereafter.

[3] In addition, the biodiesel producer tax credit results in a reduction in excise tax receipts (in millions of dollars) as follows: 2017 $2,090 and $0 thereafter.

[4] In addition, the credit for holding clean renewable energy bonds has outlay effects of (in millions of dollars) : 2017 $40; 2018 $40; 2019 $40; 2020 $40; 2021 $40; 2022 $40; 2023 $40; 2024 $40; 2025, $40; 2026 $40; and 2027 $40.

[5] In addition, the qualified energy conservation bonds have outlay effects of (in millions of dollars): 2017 $40; 2018 $40; 2019 $40; 2020 $40; 2021 $40; 2022 $40; 2023 $40; 2024 $40; 2025, $40; 2026 $40; and 2027 $40.

[6] In addition, recovery zone bonds have outlay effects (in millions of dollars) as follows: 2017 $290; 2018 $290; 2019 $290; 2020 $290; 2021 $290; 2022 $290; 2023 $290; 2024 $290; 2025, $290; 2026 $290; and 202 $290.

[7] In addition, the tax credits and deductions for postsecondary education expenses have outlay effects of (in millions of dollars): 2017 $5,770; 2018 $5,690; 2019 $5,570; 2020 $5,520; 2021 $5,460; 2022 $5,410; 2023 $5,360; 2024 $5,310; 2025 $5,240; 2026 $5,170; and 2027 $5,100.

[8] In addition, the credit for holders of zone academy bonds has outlay effects of (in millions of dollars) : 2017 $60; 2018 $60; 2019 $60; 2020 $60; 2021 $60; 2022 $60; 2023 $60; 2024 $60; 2025 $60; 2026 $60; and 2027 $60.

[9] In addition, the provision for school construction bonds has outlay effects of (in millions of dollars) : 2017 $740; 2018 $795; 2019 $795; 2020 $795; 2021 $795; 2022 $795; 2023 $795; 2024 $795; 2025 $795; 2026 $795; and 2027 $795.

[10] In addition, the employer contributions for health have effects on payroll tax receipts (in millions of dollars) as follows: 2017 $127,140; 2018 $133,530; 2019 $140,060; 2020 $146,970; 2021 $155,010; 2022 $164,100; 2023 $173,140; 2024 $182,640; 2025 $192,960; 2026 $203,240; and 2027 $214,700.

[11] In addition, the premium assistance credit provision has outlay effects (in millions of dollars) as follows : 2017 $29,730; 2018 $31,890; 2019 $33,840; 2020 $35,720; 2021 $37,770; 2022 $40,010; 2023 $42,110; 2024 $44,400; 2025 $46,790; 2026 $49,340; and 2027 $51,980.

[12] In addition, the small business credit provision has outlay effects (in millions of dollars) as follows : 2017 $20; 2018 $20; 2019 $10; 2020 $10; 2021 $10; 2022 $10; and $0 thereafter.

[13] In addition, the effect of the health coverage tax credit on receipts has outlay effects of (in millions of dollars) 2017 $20; 2018 $30; 2019 $30; 2020 $10; and $0 thereafter.

[14] In addition, the effect of the child tax credit on receipts has outlay effects of (in millions of dollars) : 2017 $29,980; 2018 $30,000; 2019 $30,010; 2020 $30,010; 2021 $30,270; 2022 $30,390; 2023 $30,540; 2024 $30,680; 2025 $30,840; 2026 $31,040; and 2027 $31,150.

[15] In addition, the earned income tax credit on receipts has outlay effects of (in millions of dollars) : 2017 $62,070; 2018 $67,870; 2019 $ 67,120; 2020 $68,500; 2021 $72,630; 2022 $74,420; 2023 $76,390; 2024 $78,260; 2025 $80,240; 2026 $82,240; and 2027 $84,150.

[16] In addition, the Build America Bonds have outlay effects of (in millions of dollars) : 2017 $3,610; 2018 $3,610; 2019 $3,610; 2020 $3,610; 2021 $3,610; 2022 $3,610; 2023 $3,610; 2024 $3,610; 2025, $3,610; 2026 $3,610; and 2027 $3,610.

Note: Provisions with estimates denoted normal tax method have no revenue loss under the reference tax law method.

All estimates have been rounded to the nearest $10 million. Provisions with estimates that rounded to zero in each year are not included in the table.

Table 13–2A. ESTIMATES OF TOTAL CORPORATE INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027

(In millions of dollars)

		Total from corporations											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
National Defense:													
1	Exclusion of benefits and allowances to armed forces personnel	0	0	0	0	0	0	0	0	0	0	0	0
International affairs:													
2	Exclusion of income earned abroad by U.S. citizens	0	0	0	0	0	0	0	0	0	0	0	0
3	Exclusion of certain allowances for Federal employees abroad	0	0	0	0	0	0	0	0	0	0	0	0
4	Inventory property sales source rules exception	3,320	3,570	3,840	4,170	4,480	4,760	5,070	5,410	5,780	6,180	6,640	49,900
5	Deferral of income from controlled foreign corporations (normal tax method)	107,200	112,560	118,190	124,100	130,310	136,820	143,660	150,850	158,390	166,310	174,620	1,415,810
6	Deferred taxes for financial firms on certain income earned overseas	16,080	16,880	17,730	18,620	19,550	20,520	21,550	22,630	23,760	24,950	26,190	212,380
General science, space, and technology:													
7	Expensing of research and experimentation expenditures (normal tax method)	7,620	7,640	8,420	9,290	10,040	10,700	11,320	11,990	12,710	13,480	14,290	109,880
8	Credit for increasing research activities	10,520	11,160	11,840	12,560	13,330	14,140	15,010	15,940	16,910	17,940	19,020	147,850
Energy:													
9	Expensing of exploration and development costs,fuels	–470	–210	–20	90	150	190	210	210	220	260	270	1,370
10	Excess of percentage over cost depletion, fuels	350	440	480	510	560	660	790	890	970	1,090	1,210	7,600
11	Exception from passive loss limitation for working interests in oil and gas properties	0	0	0	0	0	0	0	0	0	0	0	0
12	Capital gains treatment of royalties on coal	0	0	0	0	0	0	0	0	0	0	0	0
13	Exclusion of interest on energy facility bonds	0	0	0	0	0	0	0	10	10	10	10	40
14	Enhanced oil recovery credit	220	280	320	360	350	370	400	420	410	390	350	3,650
15	Energy production credit [1]	1,190	1,670	2,150	2,570	2,910	3,210	3,450	3,590	3,640	3,560	3,330	30,080
16	Marginal wells credit	20	30	20	10	10	10	30	40	50	60	70	330
17	Energy investment credit [1]	1,390	2,560	2,600	2,500	2,500	2,030	1,220	500	60	–90	–110	13,770
18	Alcohol fuel credits [2]	0	0	0	0	0	0	0	0	0	0	0	0
19	Bio-Diesel and small agri-biodiesel producer tax credits [3]	10	0	0	0	0	0	0	0	0	0	0	0
20	Tax credits for clean-fuel burning vehicles and refueling property	190	210	180	120	90	80	60	40	30	10	10	830
21	Exclusion of utility conservation subsidies	30	30	30	30	30	30	30	30	30	30	30	300
22	Credit for holding clean renewable energy bonds [4]	20	20	20	20	20	20	20	20	20	20	20	200
23	Deferral of gain from dispositions of transmission property to implement FERC restructuring policy	–190	–270	–210	–190	–150	–120	–70	–20	0	0	0	–1,030
24	Credit for investment in clean coal facilities	130	100	90	230	290	170	20	–20	–10	–10	–10	850
25	Temporary 50% expensing for equipment used in the refining of liquid fuels	–1,380	–1,140	–930	–740	–560	–370	–180	–40	0	0	0	–3,960
26	Natural gas distribution pipelines treated as 15-year property	140	150	150	150	120	60	–20	–100	–190	–270	–320	–270
27	Amortize all geological and geophysical expenditures over 2 years	50	40	50	50	50	60	50	40	30	30	40	440
28	Allowance of deduction for certain energy efficient commercial building property	10	0	–10	–10	–10	–10	–10	–10	–10	–10	–10	–90
29	Credit for construction of new energy efficient homes	50	20	0	0	0	0	0	0	0	0	0	20
30	Credit for energy efficiency improvements to existing homes	0	0	0	0	0	0	0	0	0	0	0	0

Table 13–2A. ESTIMATES OF TOTAL CORPORATE INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

	Total from corporations											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
31 Credit for residential energy efficient property	0	0	0	0	0	0	0	0	0	0	0	0
32 Qualified energy conservation bonds [5]	10	10	10	10	10	10	10	10	10	10	10	100
33 Advanced Energy Property Credit	40	0	–20	–20	–10	–10	0	0	0	0	0	–60
34 Advanced nuclear power production credit	0	0	170	440	550	550	550	550	550	550	550	4,460
35 Reduced tax rate for nuclear decommissioning funds	210	230	240	260	270	280	290	310	320	340	350	2,890
Natural resources and environment:												
36 Expensing of exploration and development costs, nonfuel minerals	40	50	50	50	50	50	50	50	50	50	50	500
37 Excess of percentage over cost depletion, nonfuel minerals	120	120	130	130	130	130	130	130	120	120	120	1,260
38 Exclusion of interest on bonds for water, sewage, and hazardous waste facilities	130	130	130	120	130	140	140	140	140	150	170	1,390
39 Capital gains treatment of certain timber income	0	0	0	0	0	0	0	0	0	0	0	0
40 Expensing of multiperiod timber growing costs	210	220	220	230	230	240	240	250	250	260	260	2,400
41 Tax incentives for preservation of historic structures	430	440	450	460	470	480	490	500	510	520	530	4,850
42 Industrial CO_2 capture and sequestration tax credit	190	200	200	0	0	0	0	0	0	0	0	400
43 Deduction for endangered species recovery expenditures	10	10	10	20	20	20	20	20	30	30	30	210
Agriculture:												
44 Expensing of certain capital outlays	10	10	10	10	20	20	20	20	20	20	20	170
45 Expensing of certain multiperiod production costs	20	20	20	20	20	20	30	30	30	30	30	250
46 Treatment of loans forgiven for solvent farmers	0	0	0	0	0	0	0	0	0	0	0	0
47 Capital gains treatment of certain income	0	0	0	0	0	0	0	0	0	0	0	0
48 Income averaging for farmers	0	0	0	0	0	0	0	0	0	0	0	0
49 Deferral of gain on sale of farm refiners	20	20	20	20	20	20	20	20	20	30	30	220
50 Expensing of reforestation expenditures	20	20	20	20	20	30	30	30	30	30	30	260
Commerce and housing:												
Financial institutions and insurance:												
51 Exemption of credit union income	2,918	2,901	3,053	3,113	3,246	3,450	3,648	3,839	3,967	4,170	4,372	35,759
52 Exclusion of life insurance death benefits	2,870	2,990	3,130	3,280	3,450	3,620	3,810	4,000	4,200	4,420	4,640	37,540
53 Exemption or special alternative tax for small property and casualty insurance companies	50	50	60	60	60	60	70	70	80	80	80	670
54 Tax exemption of insurance income earned by tax-exempt organizations	720	750	790	840	890	920	950	980	1,000	1,030	1,060	9,210
55 Small life insurance company deduction	30	30	30	30	40	40	40	40	40	40	50	380
56 Exclusion of interest spread of financial institutions	0	0	0	0	0	0	0	0	0	0	0	0
Housing:												
57 Exclusion of interest on owner-occupied mortgage subsidy bonds	350	360	350	340	350	380	380	400	400	420	460	3,840
58 Exclusion of interest on rental housing bonds	320	340	330	320	330	350	350	370	370	390	420	3,570
59 Deductibility of mortgage interest on owner-occupied homes	0	0	0	0	0	0	0	0	0	0	0	0
60 Deductibility of State and local property tax on owner-occupied homes	0	0	0	0	0	0	0	0	0	0	0	0
61 Deferral of income from installment sales	0	0	0	0	0	0	0	0	0	0	0	0
62 Capital gains exclusion on home sales	0	0	0	0	0	0	0	0	0	0	0	0
63 Exclusion of net imputed rental income	0	0	0	0	0	0	0	0	0	0	0	0

Table 13–2A. ESTIMATES OF TOTAL CORPORATE INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

	Total from corporations											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
64 Exception from passive loss rules for $25,000 of rental loss	0	0	0	0	0	0	0	0	0	0	0	0
65 Credit for low-income housing investments	7,890	7,990	8,510	8,640	8,810	9,010	9,230	9,490	9,760	10,070	10,370	91,880
66 Accelerated depreciation on rental housing (normal tax method)	360	470	580	700	840	990	1,120	1,230	1,350	1,460	1,570	10,310
67 Discharge of mortgage indebtedness												0
Commerce:												
68 Discharge of business indebtedness	0	0	0	0	0	0	0	0	0	0	0	0
69 Exceptions from imputed interest rules	0	0	0	0	0	0	0	0	0	0	0	0
70 Treatment of qualified dividends	0	0	0	0	0	0	0	0	0	0	0	0
71 Capital gains (except agriculture, timber, iron ore, and coal)	0	0	0	0	0	0	0	0	0	0	0	0
72 Capital gains exclusion of small corporation stock	0	0	0	0	0	0	0	0	0	0	0	0
73 Step-up basis of capital gains at death	0	0	0	0	0	0	0	0	0	0	0	0
74 Carryover basis of capital gains on gifts	0	0	0	0	0	0	0	0	0	0	0	0
75 Ordinary income treatment of loss from small business corporation stock sale	0	0	0	0	0	0	0	0	0	0	0	0
76 Deferral of gains from like-kind exchanges	6,000	6,310	6,630	6,960	7,300	7,670	8,050	8,460	8,880	9,320	9,750	79,330
77 Depreciation of buildings other than rental housing (normal tax method)	–3,860	–3,960	–4,150	–4,400	–4,660	–4,920	–5,190	–5,480	–5,670	–5,820	–6,020	–50,270
78 Accelerated depreciation of machinery and equipment (normal tax method)	28,810	24,120	17,490	–3,510	–3,390	5,540	11,460	16,960	21,650	25,380	28,500	144,200
79 Expensing of certain small investments (normal tax method)	290	280	290	1,040	1,120	890	790	730	700	710	710	7,260
80 Graduated corporation income tax rate (normal tax method)	1,550	1,510	1,440	1,430	1,350	1,330	1,280	1,250	1,180	1,180	1,150	13,100
81 Exclusion of interest on small issue bonds	40	50	40	40	50	50	50	50	50	50	60	490
82 Deduction for US production activities	9,930	10,400	10,870	11,390	11,960	12,550	13,180	13,840	14,530	15,260	16,020	130,000
83 Special rules for certain film and TV production	160	90	50	20	0	0	0	0	0	0	0	160
Transportation:												
84 Tonnage tax	80	80	90	90	90	100	100	110	110	120	130	1,020
85 Deferral of tax on shipping companies	20	20	20	20	20	20	20	20	20	20	20	200
86 Exclusion of reimbursed employee parking expenses	0	0	0	0	0	0	0	0	0	0	0	0
87 Exclusion for employer-provided transit passes	0	0	0	0	0	0	0	0	0	0	0	0
88 Tax credit for certain expenditures for maintaining railroad tracks	50	0	0	0	0	0	0	0	0	0	0	0
89 Exclusion of interest on bonds for Highway Projects and rail-truck transfer facilities	50	50	40	40	40	40	30	30	30	30	30	360
Community and regional development:												
90 Investment credit for rehabilitation of structures (other than historic)	10	10	10	10	10	10	10	10	10	10	10	100
91 Exclusion of interest for airport, dock, and similar bonds	200	210	200	200	210	220	220	230	230	250	270	2,240
92 Exemption of certain mutuals' and cooperatives'income	150	150	150	160	160	160	170	170	180	180	190	1,670
93 Empowerment zones	50	20	10	10	0	0	0	0	0	0	0	40
94 New markets tax credit	1,430	1,380	1,290	1,250	1,180	1,070	860	550	280	70	–120	7,810
95 Credit to holders of Gulf Tax Credit Bonds.	70	70	70	70	70	70	70	70	70	70	70	700
96 Recovery Zone Bonds [6]	40	40	40	40	40	40	40	40	40	40	40	400
97 Tribal Economic Development Bonds	10	10	10	10	10	10	10	10	10	10	10	100
Education, training, employment, and social services:												

Table 13–2A. ESTIMATES OF TOTAL CORPORATE INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

		Total from corporations											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
	Education:												
98	Exclusion of scholarship and fellowship income (normal tax method)	0	0	0	0	0	0	0	0	0	0	0	0
99	Tax credits and deductions for postsecondary education expenses [7]	0	0	0	0	0	0	0	0	0	0	0	0
100	Education Individual Retirement Accounts	0	0	0	0	0	0	0	0	0	0	0	0
101	Deductibility of student-loan interest	0	0	0	0	0	0	0	0	0	0	0	0
102	Qualified tuition programs	0	0	0	0	0	0	0	0	0	0	0	0
103	Exclusion of interest on student-loan bonds	110	120	110	110	110	120	120	130	130	140	150	1,240
104	Exclusion of interest on bonds for private nonprofit educational facilities	690	710	690	670	690	740	740	780	780	830	900	7,530
105	Credit for holders of zone academy bonds [8]	170	180	170	150	130	110	90	80	60	50	50	1,070
106	Exclusion of interest on savings bonds redeemed to finance educational expenses	0	0	0	0	0	0	0	0	0	0	0	0
107	Parental personal exemption for students age 19 or over	0	0	0	0	0	0	0	0	0	0	0	0
108	Deductibility of charitable contributions (education)	860	900	950	1,000	1,040	1,100	1,150	1,210	1,270	1,330	1,390	11,340
109	Exclusion of employer-provided educational assistance	0	0	0	0	0	0	0	0	0	0	0	0
110	Special deduction for teacher expenses	0	0	0	0	0	0	0	0	0	0	0	0
111	Discharge of student loan indebtedness	0	0	0	0	0	0	0	0	0	0	0	0
112	Qualified school construction bonds [9]	160	160	160	160	160	160	160	160	160	160	160	1,600
	Training, employment, and social services:												
113	Work opportunity tax credit	1,000	1,020	1,050	730	380	250	190	150	110	80	60	4,020
114	Employer provided child care exclusion	0	0	0	0	0	0	0	0	0	0	0	0
115	Employer-provided child care credit	10	10	10	10	10	10	10	10	10	10	10	100
116	Assistance for adopted foster children	0	0	0	0	0	0	0	0	0	0	0	0
117	Adoption credit and exclusion	0	0	0	0	0	0	0	0	0	0	0	0
118	Exclusion of employee meals and lodging (other than military)	0	0	0	0	0	0	0	0	0	0	0	0
119	Credit for child and dependent care expenses	0	0	0	0	0	0	0	0	0	0	0	0
120	Credit for disabled access expenditures	0	0	0	0	0	0	0	0	0	0	0	0
121	Deductibility of charitable contributions, other than education and health	1,800	1,900	1,930	2,010	2,090	2,170	2,250	2,340	2,430	2,530	2,630	22,280
122	Exclusion of certain foster care payments	0	0	0	0	0	0	0	0	0	0	0	0
123	Exclusion of parsonage allowances	0	0	0	0	0	0	0	0	0	0	0	0
124	Indian employment credit	20	10	10	10	10	0	0	0	0	0	0	40
125	Credit for employer differential wage payments	0	0	10	10	10	10	10	10	10	10	10	90
Health:													
126	Exclusion of employer contributions for medical insurance premiums and medical care [10]	0	0	0	0	0	0	0	0	0	0	0	0
127	Self-employed medical insurance premiums	0	0	0	0	0	0	0	0	0	0	0	0
128	Medical Savings Accounts / Health Savings Accounts	0	0	0	0	0	0	0	0	0	0	0	0
129	Deductibility of medical expenses	0	0	0	0	0	0	0	0	0	0	0	0
130	Exclusion of interest on hospital construction bonds	1,030	1,070	1,040	1,010	1,040	1,110	1,120	1,170	1,170	1,240	1,350	11,320
131	Refundable Premium Assistance Tax Credit [11]	0	0	0	0	0	0	0	0	0	0	0	0
132	Credit for employee health insurance expenses of small business [12]	10	10	10	10	0	0	0	0	0	0	0	30

Table 13–2A. ESTIMATES OF TOTAL CORPORATE INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

		Total from corporations											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
133	Deductibility of charitable contributions (health)	0	0	0	0	0	0	0	0	0	0	0	0
134	Tax credit for orphan drug research	2,240	2,710	3,280	3,960	4,790	5,800	7,020	8,490	10,280	12,440	15,060	73,830
135	Special Blue Cross/Blue Shield tax benefits	590	610	630	670	700	740	780	820	870	910	960	7,690
136	Tax credit for health insurance purchased by certain displaced and retired individuals [13]	0	0	0	0	0	0	0	0	0	0	0	0
137	Distributions from retirement plans for premiums for health and long-term care insurance	0	0	0	0	0	0	0	0	0	0	0	0
Income security:													
138	Child credit [14]	0	0	0	0	0	0	0	0	0	0	0	0
139	Exclusion of railroad retirement (Social Security equivalent) benefits	0	0	0	0	0	0	0	0	0	0	0	0
140	Exclusion of workers' compensation benefits	0	0	0	0	0	0	0	0	0	0	0	0
141	Exclusion of public assistance benefits (normal tax method)	0	0	0	0	0	0	0	0	0	0	0	0
142	Exclusion of special benefits for disabled coal miners	0	0	0	0	0	0	0	0	0	0	0	0
143	Exclusion of military disability pensions	0	0	0	0	0	0	0	0	0	0	0	0
	Net exclusion of pension contributions and earnings:												
144	Defined benefit employer plans	0	0	0	0	0	0	0	0	0	0	0	0
145	Defined contribution employer plans	0	0	0	0	0	0	0	0	0	0	0	0
146	Individual Retirement Accounts	0	0	0	0	0	0	0	0	0	0	0	0
147	Low and moderate income savers credit	0	0	0	0	0	0	0	0	0	0	0	0
148	Self-Employed plans	0	0	0	0	0	0	0	0	0	0	0	0
	Exclusion of other employee benefits:												
149	Premiums on group term life insurance	0	0	0	0	0	0	0	0	0	0	0	0
150	Premiums on accident and disability insurance	0	0	0	0	0	0	0	0	0	0	0	0
151	Income of trusts to finance supplementary unemployment benefits	0	0	0	0	0	0	0	0	0	0	0	0
152	Income of trusts to finance voluntary employee benefits associations	0	0	0	0	0	0	0	0	0	0	0	0
153	Special ESOP rules	1,960	2,020	2,080	2,150	2,220	2,290	2,360	2,430	2,510	2,580	2,660	23,300
154	Additional deduction for the blind	0	0	0	0	0	0	0	0	0	0	0	0
155	Additional deduction for the elderly	0	0	0	0	0	0	0	0	0	0	0	0
156	Tax credit for the elderly and disabled	0	0	0	0	0	0	0	0	0	0	0	0
157	Deductibility of casualty losses	0	0	0	0	0	0	0	0	0	0	0	0
158	Earned income tax credit [15]	0	0	0	0	0	0	0	0	0	0	0	0
Social Security:													
	Exclusion of social security benefits:												
159	Social Security benefits for retired and disabled workers and spouses, dependents and survivors	0	0	0	0	0	0	0	0	0	0	0	0
160	Credit for certain employer contributions to social security	490	510	530	560	590	620	650	680	720	750	790	6,400
Veterans benefits and services:													
161	Exclusion of veterans death benefits and disability compensation	0	0	0	0	0	0	0	0	0	0	0	0
162	Exclusion of veterans pensions	0	0	0	0	0	0	0	0	0	0	0	0
163	Exclusion of GI bill benefits	0	0	0	0	0	0	0	0	0	0	0	0
164	Exclusion of interest on veterans housing bonds	0	0	0	0	0	0	0	10	10	10	10	40
General purpose fiscal assistance:													
165	Exclusion of interest on public purpose State and local bonds	8,710	9,020	8,740	8,530	8,800	9,410	9,450	9,900	9,900	10,510	11,370	95,630

Table 13–2A. ESTIMATES OF TOTAL CORPORATE INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

	Total from corporations											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
166 Build America Bonds [16]	0	0	0	0	0	0	0	0	0	0	0	0
167 Deductibility of nonbusiness State and local taxes other than on owner-occupied homes	0	0	0	0	0	0	0	0	0	0	0	0
Interest:												
168 Deferral of interest on U.S. savings bonds	0	0	0	0	0	0	0	0	0	0	0	0
Addendum: Aid to State and local governments:												
Deductibility of:												
Property taxes on owner-occupied homes	0	0	0	0	0	0	0	0	0	0	0	0
Nonbusiness State and local taxes other than on owner-occupied homes	0	0	0	0	0	0	0	0	0	0	0	0
Exclusion of interest on State and local bonds for:												
Public purposes	8,710	9,020	8,740	8,530	8,800	9,410	9,450	9,900	9,900	10,510	11,370	95,630
Energy facilities	0	0	0	0	0	0	0	10	10	10	10	40
Water, sewage, and hazardous waste disposal facilities	130	130	130	120	130	140	140	140	140	150	170	1,390
Small-issues	40	50	40	40	50	50	50	50	50	50	60	490
Owner-occupied mortgage subsidies	350	360	350	340	350	380	380	400	400	420	460	3,840
Rental housing	320	340	330	320	330	350	350	370	370	390	420	3,570
Airports, docks, and similar facilities	200	210	200	200	210	220	220	230	230	250	270	2,240
Student loans	110	120	110	110	110	120	120	130	130	140	150	1,240
Private nonprofit educational facilities	690	710	690	670	690	740	740	780	780	830	900	7,530
Hospital construction	1,030	1,070	1,040	1,010	1,040	1,110	1,120	1,170	1,170	1,240	1,350	11,320
Veterans' housing	0	0	0	0	0	0	0	10	10	10	10	40

See Table 1 footnotes for specific table information

Table 13–2B. ESTIMATES OF TOTAL INDIVIDUAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027

(In millions of dollars)

	Total from individuals											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
National Defense:												
1 Exclusion of benefits and allowances to armed forces personnel	12,400	12,830	11,640	11,680	12,040	12,520	13,040	13,590	14,190	14,820	15,490	131,840
International affairs:												
2 Exclusion of income earned abroad by U.S. citizens	6,600	6,930	7,280	7,640	8,020	8,420	8,840	9,290	9,750	10,240	10,750	87,160
3 Exclusion of certain allowances for Federal employees abroad	1,370	1,430	1,510	1,580	1,660	1,740	1,830	1,920	2,020	2,120	2,230	18,040
4 Inventory property sales source rules exception	0	0	0	0	0	0	0	0	0	0	0	0
5 Deferral of income from controlled foreign corporations (normal tax method)	0	0	0	0	0	0	0	0	0	0	0	0
6 Deferred taxes for financial firms on certain income earned overseas	0	0	0	0	0	0	0	0	0	0	0	0
General science, space, and technology:												
7 Expensing of research and experimentation expenditures (normal tax method)	710	700	720	810	870	940	990	1,050	1,110	1,180	1,250	9,620
8 Credit for increasing research activities	980	1,090	1,170	1,260	1,350	1,460	1,570	1,690	1,820	1,960	2,120	15,490
Energy:												
9 Expensing of exploration and development costs,fuels	–180	–80	–10	30	50	70	80	80	80	90	100	490
10 Excess of percentage over cost depletion, fuels	90	110	120	130	140	170	200	220	240	270	300	1,900
11 Exception from passive loss limitation for working interests in oil and gas properties	20	20	20	20	20	30	30	30	30	30	30	260
12 Capital gains treatment of royalties on coal	140	160	150	140	150	150	160	160	170	180	190	1,610
13 Exclusion of interest on energy facility bonds	10	10	10	10	10	10	10	20	20	20	20	140
14 Enhanced oil recovery credit	50	70	80	90	90	90	100	110	100	100	90	920
15 Energy production credit [1]	400	560	720	860	970	1,070	1,150	1,200	1,210	1,190	1,110	10,040
16 Marginal wells credit	50	80	50	20	20	30	70	100	130	150	160	810
17 Energy investment credit [1]	460	850	870	830	830	680	410	170	20	–30	–40	4,590
18 Alcohol fuel credits [2]	20	0	0	0	0	0	0	0	0	0	0	0
19 Bio-Diesel and small agri-biodiesel producer tax credits [3]	30	0	0	0	0	0	0	0	0	0	0	0
20 Tax credits for clean-fuel burning vehicles and refueling property	400	470	490	370	270	250	220	200	150	120	90	2,630
21 Exclusion of utility conservation subsidies	440	460	490	510	540	560	590	620	650	680	720	5,820
22 Credit for holding clean renewable energy bonds [4]	50	50	50	50	50	50	50	50	50	50	50	500
23 Deferral of gain from dispositions of transmission property to implement FERC restructuring policy	0	0	0	0	0	0	0	0	0	0	0	0
24 Credit for investment in clean coal facilities	10	10	10	20	30	20	0	0	0	0	0	90
25 Temporary 50% expensing for equipment used in the refining of liquid fuels	0	0	0	0	0	0	0	0	0	0	0	0
26 Natural gas distribution pipelines treated as 15-year property	0	0	0	0	0	0	0	0	0	0	0	0
27 Amortize all geological and geophysical expenditures over 2 years	20	20	20	20	20	20	20	20	10	10	10	170
28 Allowance of deduction for certain energy efficient commercial building property	20	–10	–20	–20	–20	–20	–20	–20	–20	–20	–20	–190
29 Credit for construction of new energy efficient homes	120	50	10	0	0	0	0	0	0	0	0	60
30 Credit for energy efficiency improvements to existing homes	290	0	0	0	0	0	0	0	0	0	0	0
31 Credit for residential energy efficient property	1,430	1,380	1,360	1,250	1,060	530	120	20	0	0	0	5,720
32 Qualified energy conservation bonds [5]	20	20	20	20	20	20	20	20	20	20	20	200
33 Advanced Energy Property Credit	10	0	0	0	0	0	0	0	0	0	0	0
34 Advanced nuclear power production credit	0	0	0	0	0	0	0	0	0	0	0	0
35 Reduced tax rate for nuclear decommissioning funds	0	0	0	0	0	0	0	0	0	0	0	0
Natural resources and environment:												
36 Expensing of exploration and development costs, nonfuel minerals	0	0	0	0	0	0	0	0	0	0	0	0
37 Excess of percentage over cost depletion, nonfuel minerals	20	20	20	20	20	20	20	20	20	20	20	200

Table 13–2B. ESTIMATES OF TOTAL INDIVIDUAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

		Total from individuals											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
38	Exclusion of interest on bonds for water, sewage, and hazardous waste facilities	290	280	290	300	320	360	400	440	470	500	510	3,870
39	Capital gains treatment of certain timber income	140	160	150	140	150	150	160	160	170	180	190	1,610
40	Expensing of multiperiod timber growing costs	130	130	130	130	140	160	160	160	160	160	160	1,490
41	Tax incentives for preservation of historic structures	70	70	70	70	70	70	70	70	80	80	80	730
42	Industrial CO_2 capture and sequestration tax credit	0	0	0	0	0	0	0	0	0	0	0	0
43	Deduction for endangered species recovery expenditures	20	20	20	20	30	30	30	30	40	40	50	310
Agriculture:													
44	Expensing of certain capital outlays	180	190	200	210	220	230	240	250	260	270	280	2,350
45	Expensing of certain multiperiod production costs	290	300	310	320	330	350	360	380	390	410	420	3,570
46	Treatment of loans forgiven for solvent farmers	40	50	50	50	50	50	60	60	60	60	70	560
47	Capital gains treatment of certain income	1,360	1,550	1,470	1,450	1,480	1,520	1,580	1,640	1,720	1,800	1,890	16,100
48	Income averaging for farmers	140	150	160	170	180	180	190	200	210	220	230	1,890
49	Deferral of gain on sale of farm refiners	0	0	0	0	0	0	0	0	0	0	0	0
50	Expensing of reforestation expenditures	40	30	40	40	40	40	40	50	50	50	50	430
Commerce and housing:													
	Financial institutions and insurance:												
51	Exemption of credit union income	0	0	0	0	0	0	0	0	0	0	0	0
52	Exclusion of life insurance death benefits	11,880	12,460	13,160	13,930	15,050	16,190	17,160	18,070	19,020	20,000	20,920	165,960
53	Exemption or special alternative tax for small property and casualty insurance companies	0	0	0	0	0	0	0	0	0	0	0	0
54	Tax exemption of insurance income earned by tax-exempt organizations	0	0	0	0	0	0	0	0	0	0	0	0
55	Small life insurance company deduction	0	0	0	0	0	0	0	0	0	0	0	0
56	Exclusion of interest spread of financial institutions	160	240	280	290	300	310	320	330	340	350	360	3,120
	Housing:												
57	Exclusion of interest on owner-occupied mortgage subsidy bonds	800	760	800	820	880	980	1,110	1,220	1,310	1,370	1,400	10,650
58	Exclusion of interest on rental housing bonds	740	700	740	760	810	910	1,020	1,120	1,210	1,260	1,290	9,820
59	Deductibility of mortgage interest on owner-occupied homes	65,600	69,130	74,510	81,330	89,030	96,840	104,490	111,810	118,900	125,560	131,630	1,003,230
60	Deductibility of State and local property tax on owner-occupied homes	33,710	35,790	38,190	40,920	43,750	46,600	49,550	52,700	55,940	59,230	62,680	485,350
61	Deferral of income from installment sales	1,590	1,760	1,700	1,690	1,730	1,770	1,830	1,900	1,970	2,050	2,140	18,540
62	Capital gains exclusion on home sales	43,220	43,870	44,550	45,380	46,160	46,870	47,710	48,630	49,500	50,370	51,280	474,320
63	Exclusion of net imputed rental income	121,350	126,000	131,110	136,680	142,590	148,830	155,330	162,180	169,480	177,100	185,370	1,534,670
64	Exception from passive loss rules for $25,000 of rental loss	7,410	7,710	8,060	8,390	8,730	9,080	9,440	9,750	10,100	10,490	10,860	92,610
65	Credit for low-income housing investments	420	420	450	450	460	470	490	500	510	530	550	4,830
66	Accelerated depreciation on rental housing (normal tax method)	1,730	2,210	2,930	3,670	4,210	4,870	5,540	6,180	6,780	7,350	7,900	51,640
67	Discharge of mortgage indebtedness	310	0	0	0	0	0	0	0	0	0	0	0
	Commerce:												
68	Discharge of business indebtedness	–70	0	10	0	10	30	40	40	40	40	50	260
69	Exceptions from imputed interest rules	60	60	60	70	70	80	80	80	90	90	100	780
70	Treatment of qualified dividends	27,550	29,130	30,700	32,460	34,420	36,580	38,940	41,500	44,310	47,290	50,440	385,770
71	Capital gains (except agriculture, timber, iron ore, and coal)	101,510	115,910	109,880	107,970	110,230	113,500	117,650	122,620	128,280	134,450	141,100	1,201,590
72	Capital gains exclusion of small corporation stock	790	1,020	1,240	1,400	1,520	1,630	1,730	1,830	1,900	1,980	2,050	16,300
73	Step-up basis of capital gains at death	37,910	38,710	39,560	40,160	40,560	41,240	41,860	42,620	43,230	43,820	44,540	416,300
74	Carryover basis of capital gains on gifts	5,190	4,840	4,670	4,560	4,530	4,530	4,560	4,640	4,700	4,730	4,780	46,540
75	Ordinary income treatment of loss from small business corporation stock sale	70	80	80	80	80	80	90	90	90	100	100	870
76	Deferral of gains from like-kind exchanges	1,690	1,770	1,870	1,960	2,060	2,160	2,270	2,380	2,500	2,620	2,740	22,330
77	Depreciation of buildings other than rental housing (normal tax method)	–4,940	–5,010	–5,420	–5,850	–6,110	–6,440	–6,800	–7,210	–7,460	–7,690	–7,960	–65,950
78	Accelerated depreciation of machinery and equipment (normal tax method)	15,490	12,620	8,890	–5,800	–6,160	–440	3,270	6,630	9,470	11,670	13,550	53,700

Table 13–2B. ESTIMATES OF TOTAL INDIVIDUAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued
(In millions of dollars)

	Total from individuals											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
79 Expensing of certain small investments (normal tax method)	3,120	3,120	3,420	6,500	6,790	6,080	5,950	5,970	6,070	6,310	6,520	56,730
80 Graduated corporation income tax rate (normal tax method)	0	0	0	0	0	0	0	0	0	0	0	0
81 Exclusion of interest on small issue bonds	100	100	100	100	110	130	140	150	170	170	180	1,350
82 Deduction for US production activities	3,590	3,750	3,920	4,110	4,320	4,540	4,770	5,010	5,260	5,530	5,810	47,020
83 Special rules for certain film and TV production	40	20	10	10	0	0	0	0	0	0	0	40
Transportation:												
84 Tonnage tax	0	0	0	0	0	0	0	0	0	0	0	0
85 Deferral of tax on shipping companies	0	0	0	0	0	0	0	0	0	0	0	0
86 Exclusion of reimbursed employee parking expenses	3,202	3,319	3,452	3,582	3,731	3,862	3,971	4,117	4,257	4,404	4,571	39,266
87 Exclusion for employer-provided transit passes	1,123	1,192	1,270	1,355	1,446	1,532	1,613	1,719	1,819	1,934	2,054	15,934
88 Tax credit for certain expenditures for maintaining railroad tracks	10	0	0	0	0	0	0	0	0	0	0	0
89 Exclusion of interest on bonds for Highway Projects and rail-truck transfer facilities	150	140	130	130	120	120	110	110	100	100	90	1,150
Community and regional development:												
90 Investment credit for rehabilitation of structures (other than historic)	10	10	10	10	10	10	10	10	10	10	10	100
91 Exclusion of interest for airport, dock, and similar bonds	460	440	460	480	510	570	640	700	760	790	810	6,160
92 Exemption of certain mutuals' and cooperatives'income	0	0	0	0	0	0	0	0	0	0	0	0
93 Empowerment zones	60	30	20	20	10	10	10	0	0	0	0	100
94 New markets tax credit	30	30	30	30	30	20	20	20	10	10	0	200
95 Credit to holders of Gulf Tax Credit Bonds.	170	180	200	230	250	280	310	330	350	360	370	2,860
96 Recovery Zone Bonds [6]	90	100	110	120	140	150	170	180	190	200	210	1,570
97 Tribal Economic Development Bonds	30	30	30	40	40	50	50	60	60	60	70	490
Education, training, employment, and social services:												
Education:												
98 Exclusion of scholarship and fellowship income (normal tax method)	3,300	3,410	3,490	3,650	3,800	3,970	4,140	4,310	4,500	4,690	4,890	40,850
99 Tax credits and deductions for postsecondary education expenses [7]	16,460	16,360	16,320	16,310	16,290	16,190	16,180	16,170	16,120	16,020	15,980	161,940
100 Education Individual Retirement Accounts	30	30	40	40	40	40	40	40	30	30	30	360
101 Deductibility of student-loan interest	2,340	2,360	2,390	2,500	2,510	2,520	2,610	2,610	2,630	2,650	2,670	25,450
102 Qualified tuition programs	1,950	2,140	2,330	2,530	2,730	2,940	3,150	3,380	3,600	3,830	4,070	30,700
103 Exclusion of interest on student-loan bonds	260	250	260	270	290	320	360	390	420	440	450	3,450
104 Exclusion of interest on bonds for private nonprofit educational facilities	1,560	1,490	1,570	1,610	1,720	1,920	2,160	2,380	2,550	2,680	2,740	20,820
105 Credit for holders of zone academy bonds [8]	0	0	0	0	0	0	0	0	0	0	0	0
106 Exclusion of interest on savings bonds redeemed to finance educational expenses	30	30	30	30	40	40	40	40	50	50	50	400
107 Parental personal exemption for students age 19 or over	9,600	9,500	9,490	9,500	9,540	9,590	9,630	9,670	9,700	9,770	9,940	96,330
108 Deductibility of charitable contributions (education)	4,620	4,990	5,380	5,730	6,060	6,390	6,710	7,040	7,360	7,670	7,980	65,310
109 Exclusion of employer-provided educationalassistance	900	940	990	1,040	1,100	1,150	1,210	1,270	1,340	1,400	1,480	11,920
110 Special deduction for teacher expenses	200	210	200	210	250	250	250	260	260	260	270	2,420
111 Discharge of student loan indebtedness	100	100	100	110	110	110	110	120	120	120	120	1,120
112 Qualified school construction bonds [9]	490	490	490	490	490	490	490	490	490	490	490	4,900
Training, employment, and social services:												
113 Work opportunity tax credit	320	320	320	260	110	60	40	30	20	20	10	1,190
114 Employer provided child care exclusion	900	900	940	970	1,000	1,030	1,060	1,100	1,140	1,180	1,220	10,540
115 Employer-provided child care credit	0	0	0	0	0	0	0	0	0	0	0	0
116 Assistance for adopted foster children	590	620	660	690	730	780	820	860	910	950	1,000	8,020
117 Adoption credit and exclusion	620	620	650	620	640	690	690	710	690	710	720	6,740
118 Exclusion of employee meals and lodging (other than military)	4,830	4,990	5,150	5,290	5,440	5,590	5,750	5,910	6,060	6,220	6,380	56,780

Table 13–2B. ESTIMATES OF TOTAL INDIVIDUAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued

(In millions of dollars)

		Total from individuals											
		2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
119	Credit for child and dependent care expenses	4,600	4,690	4,790	4,890	4,960	5,060	5,140	5,220	5,300	5,370	5,440	50,860
120	Credit for disabled access expenditures	10	10	10	10	10	10	10	10	10	10	10	100
121	Deductibility of charitable contributions, other than education and health	45,960	49,820	53,100	56,580	59,840	63,080	66,260	69,480	72,660	75,740	79,240	645,800
122	Exclusion of certain foster care payments	490	510	530	550	570	590	610	620	640	660	680	5,960
123	Exclusion of parsonage allowances	920	970	1,021	1,075	1,132	1,192	1,255	1,322	1,392	1,465	1,543	12,367
124	Indian employment credit	20	10	10	10	10	10	10	10	10	10	10	100
125	Credit for employer differential wage payments	0	0	0	0	0	10	10	10	10	10	10	60
Health:													
126	Exclusion of employer contributions for medical insurance premiums and medical care [10]	214,280	227,880	242,880	257,390	273,180	291,180	309,500	328,620	349,300	370,360	393,430	3,043,720
127	Self-employed medical insurance premiums	8,140	8,170	7,750	8,010	8,460	8,830	9,220	9,640	10,110	10,610	11,170	91,970
128	Medical Savings Accounts / Health Savings Accounts	8,240	9,400	10,650	11,730	12,750	13,820	14,830	15,770	16,720	17,700	18,730	142,100
129	Deductibility of medical expenses	9,720	10,030	10,870	11,850	12,840	13,790	14,790	15,830	16,910	18,090	19,400	144,400
130	Exclusion of interest on hospital construction bonds	2,350	2,240	2,360	2,420	2,590	2,890	3,250	3,570	3,840	4,020	4,120	31,300
131	Refundable Premium Assistance Tax Credit [11]	5,630	6,310	7,100	7,740	8,380	8,910	9,370	10,040	10,590	11,390	12,140	91,970
132	Credit for employee health insurance expenses of small business [12]	80	70	60	40	30	20	10	10	10	10	10	270
133	Deductibility of charitable contributions (health)	5,120	5,530	5,960	6,350	6,710	7,080	7,430	7,790	8,150	8,500	8,860	72,360
134	Tax credit for orphan drug research	40	50	60	70	90	100	120	140	170	190	230	1,220
135	Special Blue Cross/Blue Shield tax benefits	0	0	0	0	0	0	0	0	0	0	0	0
136	Tax credit for health insurance purchased by certain displaced and retired individuals [13]	30	20	10	0	0	0	0	0	0	0	0	30
137	Distributions from retirement plans for premiums for health and long-term care insurance	460	480	500	520	540	560	580	600	620	650	670	5,720
Income security:													
138	Child credit [14]	24,340	24,270	23,960	23,580	23,140	22,690	22,270	21,860	21,410	20,980	20,610	224,770
139	Exclusion of railroad retirement (Social Security equivalent) benefits	290	280	280	270	260	250	240	220	210	190	170	2,370
140	Exclusion of workers' compensation benefits	9,970	10,040	10,110	10,180	10,250	10,320	10,390	10,470	10,540	10,610	10,690	103,600
141	Exclusion of public assistance benefits (normal tax method)	590	600	620	640	670	680	700	730	740	750	660	6,790
142	Exclusion of special benefits for disabled coal miners	20	20	20	20	20	10	10	10	10	10	10	140
143	Exclusion of military disability pensions	170	180	180	190	190	200	200	210	210	220	220	2,000
	Net exclusion of pension contributions and earnings:	0	0	0	0	0	0	0	0	0	0	0	0
144	Defined benefit employer plans	76,091	76,998	77,341	78,453	77,081	75,678	73,516	71,376	68,657	65,592	61,673	726,365
145	Defined contribution employer plans	69,440	71,270	80,480	87,010	89,310	95,400	112,200	122,030	126,140	130,240	137,820	1,051,900
146	Individual Retirement Accounts	17,320	19,110	20,630	22,180	23,790	25,460	27,100	28,150	29,080	29,880	30,640	256,020
147	Low and moderate income savers credit	1,440	1,470	1,470	1,460	1,440	1,440	1,440	1,440	1,420	1,450	1,430	14,460
148	Self-Employed plans	28,460	26,980	30,010	33,390	36,930	40,280	44,000	48,070	52,400	57,060	62,170	431,290
	Exclusion of other employee benefits:	0	0	0	0	0	0	0	0	0	0	0	0
149	Premiums on group term life insurance	3,350	3,140	3,250	3,370	3,500	3,630	3,770	3,910	4,070	4,230	4,390	37,260
150	Premiums on accident and disability insurance	330	330	330	330	340	340	340	350	350	350	350	3,410
151	Income of trusts to finance supplementary unemployment benefits	20	30	40	40	50	50	50	50	60	60	60	490
152	Income of trusts to finance voluntary employee benefits associations	1,180	1,240	1,290	1,350	1,420	1,480	1,550	1,630	1,710	1,780	1,860	15,310
153	Special ESOP rules	120	120	130	130	140	140	150	150	150	160	160	1,430
154	Additional deduction for the blind	30	30	30	30	40	40	40	50	50	60	60	430
155	Additional deduction for the elderly	3,470	3,770	4,050	4,380	4,780	5,090	5,470	5,850	6,290	6,810	7,380	53,870
156	Tax credit for the elderly and disabled	10	10	10	0	0	0	0	0	0	0	0	20
157	Deductibility of casualty losses	330	350	380	400	430	460	500	530	560	590	630	4,830
158	Earned income tax credit [15]	1,760	1,810	3,960	4,100	2,060	2,150	2,250	2,370	2,500	2,570	2,700	26,470
Social Security:													
	Exclusion of social security benefits:												
159	Social Security benefits for retired and disabled workers and spouses, dependents and survivors	34,500	36,110	37,660	39,430	41,430	43,840	46,830	48,780	50,130	53,690	57,850	455,750

Table 13–2B. ESTIMATES OF TOTAL INDIVIDUAL INCOME TAX EXPENDITURES FOR FISCAL YEARS 2017-2027—Continued
(In millions of dollars)

	Total from individuals											
	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018–2027
160 Credit for certain employer contributions to social security	550	570	600	630	660	690	730	760	800	840	890	7,170
Veterans benefits and services:												
161 Exclusion of veterans death benefits and disability compensation	7,920	8,620	9,190	9,560	9,910	10,290	10,680	11,090	11,520	11,960	12,440	105,260
162 Exclusion of veterans pensions	480	510	540	560	580	610	630	660	690	720	750	6,250
163 Exclusion of GI bill benefits	1,740	1,830	1,910	2,010	2,110	2,220	2,330	2,440	2,570	2,700	2,840	22,960
164 Exclusion of interest on veterans housing bonds	10	10	10	10	10	10	10	20	20	20	20	140
General purpose fiscal assistance:												
165 Exclusion of interest on public purpose State and local bonds	19,850	18,900	19,910	20,420	21,880	24,420	27,430	30,160	32,390	33,960	34,790	264,260
166 Build America Bonds [16]	0	0	0	0	0	0	0	0	0	0	0	0
167 Deductibility of nonbusiness State and local taxes other than on owner-occupied homes	70,420	74,980	80,190	86,220	91,900	97,460	103,350	109,610	116,020	122,310	128,980	1,011,020
Interest:												
168 Deferral of interest on U.S. savings bonds	960	950	940	930	930	920	910	900	890	880	890	9,140
Addendum: Aid to State and local governments:												
Deductibility of:												
Property taxes on owner-occupied homes	33,710	35,790	38,190	40,920	43,750	46,600	49,550	52,700	55,940	59,230	62,680	485,350
Nonbusiness State and local taxes other than on owner-occupied homes	70,420	74,980	80,190	86,220	91,900	97,460	103,350	109,610	116,020	122,310	128,980	1,011,020
Exclusion of interest on State and local bonds for:												
Public purposes	19,850	18,900	19,910	20,420	21,880	24,420	27,430	30,160	32,390	33,960	34,790	264,260
Energy facilities	10	10	10	10	10	10	10	20	20	20	20	140
Water, sewage, and hazardous waste disposal facilities	290	280	290	300	320	360	400	440	470	500	510	3,870
Small-issues	100	100	100	100	110	130	140	150	170	170	180	1,350
Owner-occupied mortgage subsidies	800	760	800	820	880	980	1,110	1,220	1,310	1,370	1,400	10,650
Rental housing	740	700	740	760	810	910	1,020	1,120	1,210	1,260	1,290	9,820
Airports, docks, and similar facilities	460	440	460	480	510	570	640	700	760	790	810	6,160
Student loans	260	250	260	270	290	320	360	390	420	440	450	3,450
Private nonprofit educational facilities	1,560	1,490	1,570	1,610	1,720	1,920	2,160	2,380	2,550	2,680	2,740	20,820
Hospital construction	2,350	2,240	2,360	2,420	2,590	2,890	3,250	3,570	3,840	4,020	4,120	31,300
Veterans' housing	10	10	10	10	10	10	10	20	20	20	20	140

See Table 1 footnotes for specific table information

Table 13–3. INCOME TAX EXPENDITURES RANKED BY TOTAL FISCAL YEAR 2018–2027 PROJECTED REVENUE EFFECT
(In millions of dollars)

	Provision	2018	2019	2018–2027
126	Exclusion of employer contributions for medical insurance premiums and medical care [10]	227,880	242,880	3,043,720
63	Exclusion of net imputed rental income	126,000	131,110	1,534,670
5	Deferral of income from controlled foreign corporations (normal tax method)	112,560	118,190	1,415,810
71	Capital gains (except agriculture, timber, iron ore, and coal)	115,910	109,880	1,201,590
145	Defined contribution employer plans	71,270	80,480	1,051,900
167	Deductibility of nonbusiness State and local taxes other than on owner-occupied homes	74,980	80,190	1,011,020
59	Deductibility of mortgage interest on owner-occupied homes	69,130	74,510	1,003,230
144	Defined benefit employer plans	76,998	77,341	726,365
121	Deductibility of charitable contributions, other than education and health	51,720	55,030	668,080
60	Deductibility of State and local property tax on owner-occupied homes	35,790	38,190	485,350
62	Capital gains exclusion on home sales	43,870	44,550	474,320
159	Social Security benefits for retired and disabled workers and spouses, dependents and survivors	36,110	37,660	455,750
148	Self-Employed plans	26,980	30,010	431,290
73	Step-up basis of capital gains at death	38,710	39,560	416,300
70	Treatment of qualified dividends	29,130	30,700	385,770
165	Exclusion of interest on public purpose State and local bonds	27,920	28,650	359,890
146	Individual Retirement Accounts	19,110	20,630	256,020
138	Child credit [14]	24,270	23,960	224,770
6	Deferred taxes for financial firms on certain income earned overseas	16,880	17,730	212,380
52	Exclusion of life insurance death benefits	15,450	16,290	203,500
78	Accelerated depreciation of machinery and equipment (normal tax method)	36,740	26,380	197,900
82	Deduction for US production activities	14,150	14,790	177,020
8	Credit for increasing research activities	12,250	13,010	163,340
99	Tax credits and deductions for postsecondary education expenses [7]	16,360	16,320	161,940
129	Deductibility of medical expenses	10,030	10,870	144,400
128	Medical Savings Accounts / Health Savings Accounts	9,400	10,650	142,100
1	Exclusion of benefits and allowances to armed forces personnel	12,830	11,640	131,840
7	Expensing of research and experimentation expenditures (normal tax method)	8,340	9,140	119,500
161	Exclusion of veterans death benefits and disability compensation	8,620	9,190	105,260
140	Exclusion of workers' compensation benefits	10,040	10,110	103,600
76	Deferral of gains from like-kind exchanges	8,080	8,500	101,660
65	Credit for low-income housing investments	8,410	8,960	96,710
107	Parental personal exemption for students age 19 or over	9,500	9,490	96,330
64	Exception from passive loss rules for $25,000 of rental loss	7,710	8,060	92,610
127	Self-employed medical insurance premiums	8,170	7,750	91,970
131	Refundable Premium Assistance Tax Credit [11]	6,310	7,100	91,970
2	Exclusion of income earned abroad by U.S. citizens	6,930	7,280	87,160
108	Deductibility of charitable contributions (education)	5,890	6,330	76,650
134	Tax credit for orphan drug research	2,760	3,340	75,050
133	Deductibility of charitable contributions (health)	5,530	5,960	72,360
79	Expensing of certain small investments (normal tax method)	3,400	3,710	63,990
66	Accelerated depreciation on rental housing (normal tax method)	2,680	3,510	61,950
118	Exclusion of employee meals and lodging (other than military)	4,990	5,150	56,780
155	Additional deduction for the elderly	3,770	4,050	53,870
119	Credit for child and dependent care expenses	4,690	4,790	50,860
4	Inventory property sales source rules exception	3,570	3,840	49,900
74	Carryover basis of capital gains on gifts	4,840	4,670	46,540
130	Exclusion of interest on hospital construction bonds	3,310	3,400	42,620
98	Exclusion of scholarship and fellowship income (normal tax method)	3,410	3,490	40,850
15	Energy production credit [1]	2,230	2,870	40,120
86	Exclusion of reimbursed employee parking expenses	3,319	3,452	39,266
149	Premiums on group term life insurance	3,140	3,250	37,260
51	Exemption of credit union income	2,901	3,053	35,759
102	Qualified tuition programs	2,140	2,330	30,700
104	Exclusion of interest on bonds for private nonprofit educational facilities	2,200	2,260	28,350
158	Earned income tax credit [15]	1,810	3,960	26,470

Table 13–3. INCOME TAX EXPENDITURES RANKED BY TOTAL FISCAL YEAR 2018–2027 PROJECTED REVENUE EFFECT—Continued

(In millions of dollars)

	Provision	2018	2019	2018–2027
101	Deductibility of student-loan interest	2,360	2,390	25,450
153	Special ESOP rules	2,140	2,210	24,730
163	Exclusion of GI bill benefits	1,830	1,910	22,960
61	Deferral of income from installment sales	1,760	1,700	18,540
17	Energy investment credit [1]	3,410	3,470	18,360
3	Exclusion of certain allowances for Federal employees abroad	1,430	1,510	18,040
72	Capital gains exclusion of small corporation stock	1,020	1,240	16,300
47	Capital gains treatment of certain income	1,550	1,470	16,100
87	Exclusion for employer-provided transit passes	1,192	1,270	15,934
152	Income of trusts to finance voluntary employee benefits associations	1,240	1,290	15,310
57	Exclusion of interest on owner-occupied mortgage subsidy bonds	1,120	1,150	14,490
147	Low and moderate income savers credit	1,470	1,470	14,460
160	Credit for certain employer contributions to social security	1,080	1,130	13,570
58	Exclusion of interest on rental housing bonds	1,040	1,070	13,390
80	Graduated corporation income tax rate (normal tax method)	1,510	1,440	13,100
123	Exclusion of parsonage allowances	970	1,021	12,367
109	Exclusion of employer-provided educational assistance	940	990	11,920
114	Employer provided child care exclusion	900	940	10,540
10	Excess of percentage over cost depletion, fuels	550	600	9,500
54	Tax exemption of insurance income earned by tax-exempt organizations	750	790	9,210
168	Deferral of interest on U.S. savings bonds	950	940	9,140
91	Exclusion of interest for airport, dock, and similar bonds	650	660	8,400
116	Assistance for adopted foster children	620	660	8,020
94	New markets tax credit	1,410	1,320	8,010
135	Special Blue Cross/Blue Shield tax benefits	610	630	7,690
141	Exclusion of public assistance benefits (normal tax method)	600	620	6,790
117	Adoption credit and exclusion	620	650	6,740
112	Qualified school construction bonds [9]	650	650	6,500
162	Exclusion of veterans pensions	510	540	6,250
21	Exclusion of utility conservation subsidies	490	520	6,120
122	Exclusion of certain foster care payments	510	530	5,960
31	Credit for residential energy efficient property	1,380	1,360	5,720
137	Distributions from retirement plans for premiums for health and long-term care insurance	480	500	5,720
41	Tax incentives for preservation of historic structures	510	520	5,580
38	Exclusion of interest on bonds for water, sewage, and hazardous waste facilities	410	420	5,260
113	Work opportunity tax credit	1,340	1,370	5,210
157	Deductibility of casualty losses	350	380	4,830
103	Exclusion of interest on student-loan bonds	370	370	4,690
14	Enhanced oil recovery credit	350	400	4,570
34	Advanced nuclear power production credit	0	170	4,460
40	Expensing of multiperiod timber growing costs	350	350	3,890
45	Expensing of certain multiperiod production costs	320	330	3,820
95	Credit to holders of Gulf Tax Credit Bonds.	250	270	3,560
20	Tax credits for clean-fuel burning vehicles and refueling property	680	670	3,460
150	Premiums on accident and disability insurance	330	330	3,410
56	Exclusion of interest spread of financial institutions	240	280	3,120
35	Reduced tax rate for nuclear decommissioning funds	230	240	2,890
44	Expensing of certain capital outlays	200	210	2,520
110	Special deduction for teacher expenses	210	200	2,420
139	Exclusion of railroad retirement (Social Security equivalent) benefits	280	280	2,370
143	Exclusion of military disability pensions	180	180	2,000
96	Recovery Zone Bonds [6]	140	150	1,970
48	Income averaging for farmers	150	160	1,890
9	Expensing of exploration and development costs, fuels	–290	–30	1,860
81	Exclusion of interest on small issue bonds	150	140	1,840
92	Exemption of certain mutuals' and cooperatives' income	150	150	1,670

Table 13–3. INCOME TAX EXPENDITURES RANKED BY TOTAL FISCAL YEAR 2018–2027 PROJECTED REVENUE EFFECT—Continued

(In millions of dollars)

	Provision	2018	2019	2018–2027
12	Capital gains treatment of royalties on coal	160	150	1,610
39	Capital gains treatment of certain timber income	160	150	1,610
89	Exclusion of interest on bonds for Highway Projects and rail-truck transfer facilities	190	170	1,510
37	Excess of percentage over cost depletion, nonfuel minerals	140	150	1,460
16	Marginal wells credit	110	70	1,140
111	Discharge of student loan indebtedness	100	100	1,120
105	Credit for holders of zone academy bonds [8]	180	170	1,070
84	Tonnage tax	80	90	1,020
24	Credit for investment in clean coal facilities	110	100	940
75	Ordinary income treatment of loss from small business corporation stock sale	80	80	870
69	Exceptions from imputed interest rules	60	60	780
22	Credit for holding clean renewable energy bonds [4]	70	70	700
50	Expensing of reforestation expenditures	50	60	690
53	Exemption or special alternative tax for small property and casualty insurance companies	50	60	670
27	Amortize all geological and geophysical expenditures over 2 years	60	70	610
97	Tribal Economic Development Bonds	40	40	590
46	Treatment of loans forgiven for solvent farmers	50	50	560
43	Deduction for endangered species recovery expenditures	30	30	520
36	Expensing of exploration and development costs, nonfuel minerals	50	50	500
151	Income of trusts to finance supplementary unemployment benefits	30	40	490
154	Additional deduction for the blind	30	30	430
42	Industrial CO_2 capture and sequestration tax credit	200	200	400
106	Exclusion of interest on savings bonds redeemed to finance educational expenses	30	30	400
55	Small life insurance company deduction	30	30	380
100	Education Individual Retirement Accounts	30	40	360
32	Qualified energy conservation bonds [5]	30	30	300
132	Credit for employee health insurance expenses of small business [12]	80	70	300
11	Exception from passive loss limitation for working interests in oil and gas properties	20	20	260
68	Discharge of business indebtedness	0	10	260
49	Deferral of gain on sale of farm refiners	20	20	220
83	Special rules for certain film and TV production	110	60	200
85	Deferral of tax on shipping companies	20	20	200
90	Investment credit for rehabilitation of structures (other than historic)	20	20	200
13	Exclusion of interest on energy facility bonds	10	10	180
164	Exclusion of interest on veterans housing bonds	10	10	180
125	Credit for employer differential wage payments	0	10	150
93	Empowerment zones	50	30	140
124	Indian employment credit	20	20	140
142	Exclusion of special benefits for disabled coal miners	20	20	140
115	Employer-provided child care credit	10	10	100
120	Credit for disabled access expenditures	10	10	100
29	Credit for construction of new energy efficient homes	70	10	80
136	Tax credit for health insurance purchased by certain displaced and retired individuals [13]	20	10	30
156	Tax credit for the elderly and disabled	10	10	20
18	Alcohol fuel credits [2]	0	0	0
19	Bio-Diesel and small agri-biodiesel producer tax credits [3]	0	0	0
30	Credit for energy efficiency improvements to existing homes	0	0	0
67	Discharge of mortgage indebtedness	0	0	0
88	Tax credit for certain expenditures for maintaining railroad tracks	0	0	0
166	Build America Bonds [16]	0	0	0
33	Advanced Energy Property Credit	0	–20	–60
26	Natural gas distribution pipelines treated as 15-year property	150	150	–270
28	Allowance of deduction for certain energy efficient commercial building property	–10	–30	–280
23	Deferral of gain from dispositions of transmission property to implement FERC restructuring policy	–270	–210	–1,030
25	Temporary 50% expensing for equipment used in the refining of liquid fuels	–1,140	–930	–3,960
77	Depreciation of buildings other than rental housing (normal tax method)	–8,970	–9,570	–116,220

See Table 1 footnotes for specific table information

The modified rate structures also have the effect of reducing the cost of most tax expenditures. Statutory individual income tax rates were reduced for most taxpayers. In addition, the expanded standard deduction also had the effect of reducing the benefit of itemized deductions. On the other hand, the repeal of personal exemptions has the effect of increasing the value of tax expenditures as individuals are pushed into higher brackets. The reduction in the corporate tax from 35 to 21 percent also reduces the benefit of tax expenditures as well.

National Defense

1. ***Exclusion of benefits and allowances to armed forces personnel.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income because they represent accretions to wealth that do not materially differ from cash wages. As an example, a rental voucher of $100 is (approximately) equal in value to $100 of cash income. In contrast to this treatment, certain housing and meals, in addition to other benefits provided military personnel, either in cash or in kind, as well as certain amounts of pay related to combat service, are excluded from income subject to tax.

International Affairs

2. ***Exclusion of income earned abroad by U.S. citizens.***—Under the baseline tax system, all compensation received by U.S. citizens and residents is properly included in their taxable income. It makes no difference whether the compensation is a result of working abroad or whether it is labeled as a housing allowance. In contrast to this treatment, U.S. tax law allows U.S. citizens and residents who live abroad, work in the private sector, and satisfy a foreign residency requirement to exclude up to $80,000, plus adjustments for inflation since 2004, in foreign earned income from U.S. taxes. In addition, if these taxpayers are provided housing by their employers, then they may also exclude the cost of such housing from their income to the extent that it exceeds 16 percent of the earned income exclusion limit. This housing exclusion is capped at 30 percent of the earned income exclusion limit, with geographical adjustments. If taxpayers do not receive a specific allowance for housing expenses, they may deduct housing expenses up to the amount by which foreign earned income exceeds their foreign earned income exclusion.

3. ***Exclusion of certain allowances for Federal employees abroad.***—In general, all compensation received by U.S. citizens and residents is properly included in their taxable income. It makes no difference whether the compensation is a result of working abroad or whether it is labeled as an allowance for the high cost of living abroad. In contrast to this treatment, U.S. Federal civilian employees and Peace Corps members who work outside the continental United States are allowed to exclude from U.S. taxable income certain special allowances they receive to compensate them for the relatively high costs associated with living overseas. The allowances supplement wage income and cover expenses such as rent, education, and the cost of travel to and from the United States.

4. ***Inventory property sales source rules exception.***—The United States generally taxes the worldwide income of U.S. persons and business entities. Under the baseline tax system, taxpayers receive a credit for foreign taxes paid which is limited to the pre-credit U.S. tax on the foreign source income. In contrast, the sales source rules for inventory property under current law allow U.S. exporters to use more foreign tax credits by allowing the exporters to attribute a larger portion of their earnings to foreign sources than would be the case if the allocation of earnings was based on actual economic activity.

5. ***Deferral of income from controlled foreign corporations (normal tax method).***—Under the baseline tax system, the United States generally taxes the worldwide income of U.S. persons and business entities. In contrast, certain active income of foreign corporations controlled by U.S. shareholders is not subject to U.S. taxation when it is earned. The income becomes taxable only when the controlling U.S. shareholders receive dividends or other distributions from their foreign stockholding. The reference law tax baseline reflects this tax treatment where only realized income is taxed. Under the normal tax method, however, the currently attributable foreign source pre-tax income from such a controlling interest is considered to be subject to U.S. taxation, whether or not distributed. Thus, the normal tax method considers the amount of controlled foreign corporation income not yet distributed to a U.S. shareholder as tax-deferred income.

6. ***Deferred taxes for financial firms on certain income earned overseas.***—The United States generally taxes the worldwide income of U.S. persons and business entities. The baseline tax system would not allow the deferral of tax or other relief targeted at particular industries or activities. In contrast, the Tax Code allows financial firms to defer taxes on income earned overseas in an active business.

General Science, Space, and Technology

7. ***Expensing of research and experimentation expenditures (normal tax method).***—The baseline tax system allows a deduction for the cost of producing income. It requires taxpayers to capitalize the costs associated with investments over time to better match the streams of income and associated costs. Research and experimentation (R&E) projects can be viewed as investments because, if successful, their benefits accrue for several years. It is often difficult, however, to identify whether a specific R&E project is successful and, if successful, what its expected life will be. Because of this ambiguity, the reference law baseline tax system would allow expensing of R&E expenditures. In contrast, under the normal tax method, the expensing of R&E expenditures is viewed as a tax expenditure. The baseline assumed for the normal

Table 13–4. PRESENT VALUE OF SELECTED TAX EXPENDITURES FOR ACTIVITY IN CALENDAR YEAR 2017
(In millions of dollars)

	Provision	2017 Present Value of Revenue Loss
5	Deferral of income from controlled foreign corporations (normal tax method)	63,630
7	Expensing of research and experimentation expenditures (normal tax method)	3,390
22	Credit for holding clean renewable energy bonds	0
9	Expensing of exploration and development costs - fuels	740
36	Expensing of exploration and development costs - nonfuels	40
40	Expensing of multiperiod timber growing costs	110
45	Expensing of certain multiperiod production costs - agriculture	50
44	Expensing of certain capital outlays - agriculture	30
50	Expensing of reforestation expenditures	20
66	Accelerated depreciation on rental housing	14,080
77	Depreciation of buildings other than rental	–5,300
78	Accelerated depreciation of machinery and equipment	27,200
78	Expensing of certain small investments (normal tax method)	1,320
105	Credit for holders of zone academy bonds	160
65	Credit for low-income housing investments	9,120
102	Qualified tuition programs	3,990
144	Defined benefit employer plans	29,729
145	Defined contribution employer plans	79,310
146	Exclusion of IRA contributions and earnings	1,600
146	Exclusion of Roth earnings and distributions	5,300
146	Exclusion of non-deductible IRA earnings	500
148	Exclusion of contributions and earnings for Self-Employed plans	5,480
165	Exclusion of interest on public-purpose bonds	16,520
	Exclusion of interest on non-public purpose bonds	4,260
170	Deferral of interest on U.S. savings bonds	260

tax method is that all R&E expenditures are successful and have an expected life of five years.

8. ***Credit for increasing research activities.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. In contrast, the Tax Code allows an R&E credit of up to 20 percent of qualified research expenditures in excess of a base amount. The base amount of the credit is generally determined by multiplying a “fixed-base percentage” by the average amount of the company’s gross receipts for the prior four years. The taxpayer’s fixed base percentage generally is the ratio of its research expenses to gross receipts for 1984 through 1988. Taxpayers can elect the alternative simplified credit regime, which equals 14 percent of qualified research expenses that exceed 50 percent of the average qualified research expenses for the three preceding taxable years.

Energy

9. ***Expensing of exploration and development costs, fuels.***—Under the baseline tax system, the costs of exploring and developing oil and gas wells and coal mines or other natural fuel deposits would be capitalized and then amortized (or depreciated) over an estimate of the economic life of the property. This insures that the net income from the well or mine is measured appropriately each year.

In contrast to this treatment, current law allows immediate deduction, i.e. expensing, of intangible drilling costs for successful investments in domestic oil and gas wells (such as wages, the cost of using machinery for grading and drilling, and the cost of unsalvageable materials used in constructing wells). Current law also allows immediate deduction of eligible exploration and development costs for domestic coal mines and other natural fuel deposits. Because expensing allows recovery of costs sooner, it is more generous for the taxpayer than amortization. Expensing provisions for exploration expenditures apply only to properties for which a deduction for percentage depletion is allowable. For oil and gas wells, integrated oil companies may deduct only 70 percent of intangible drilling costs and must amortize the remaining 30 percent over five years. Non-integrated oil companies may expense all such costs.

10. ***Excess of percentage over cost depletion, fuels.***—The baseline tax system would allow recovery of the costs of developing certain oil, gas, and mineral fuel

properties using cost depletion. Cost depletion is similar in concept to depreciation, in that the costs of developing or acquiring the asset are capitalized and then gradually reduced over an estimate of the asset's economic life, as is appropriate for measuring net income.

In contrast, the Tax Code generally allows independent fuel producers and royalty owners to take percentage depletion deductions rather than cost depletion on limited quantities of output. Under percentage depletion, taxpayers deduct a percentage of gross income from fossil fuel production. In certain cases the deduction is limited to a fraction of the asset's net income. Over the life of an investment, percentage depletion deductions can exceed the cost of the investment. Consequently, percentage depletion offers more generous tax treatment than would cost depletion, which would limit deductions to an investment's cost.

11. ***Exception from passive loss limitation for working interests in oil and gas properties.***—The baseline tax system accepts current law's general rule limiting taxpayers' ability to deduct losses from passive activities against nonpassive income (e.g., wages, interest, and dividends). Passive activities generally are defined as those in which the taxpayer does not materially participate, and there are numerous additional considerations brought to bear on the determination of which activities are passive for a given taxpayer. Losses are limited in an attempt to limit tax sheltering activities. Passive losses that are unused may be carried forward and applied against future passive income.

An exception from the passive loss limitation is provided for a working interest in an oil or gas property that the taxpayer holds directly or through an entity that does not limit the liability of the taxpayer with respect to the interest. Thus, taxpayers can deduct losses from such working interests against nonpassive income without regard to whether they materially participate in the activity.

12. ***Capital gains treatment of royalties on coal.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low tax rates to apply to certain types or sources of income. For individuals, tax rates on regular income vary from 10 percent to 39.6 percent (plus a 3.8-percent surtax on high income taxpayers), depending on the taxpayer's income. In contrast, current law allows capital gains realized by individuals to be taxed at a preferentially low rate that is no higher than 20 percent (plus the 3.8-percent surtax). Certain sales of coal under royalty contracts qualify for taxation as capital gains rather than ordinary income, and so benefit from the preferentially low 20 percent maximum tax rate on capital gains.

13. ***Exclusion of interest on energy facility bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows interest earned on State and local bonds used to finance construction of certain energy facilities to be exempt from tax. These bonds are generally subject to the State private-activity-bond annual volume cap.

14. ***Enhanced oil recovery credit.***—A credit is provided equal to 15 percent of the taxpayer's costs for enhanced oil recovery on U.S. projects. The credit is reduced in proportion to the ratio of the reference price of oil for the previous calendar year minus $28, adjusted for inflation from 1990, to $6.

15. ***Energy production credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code provides a credit for certain electricity produced from wind energy, biomass, geothermal energy, solar energy, small irrigation power, municipal solid waste, or qualified hydropower and sold to an unrelated party. Wind facilities must have begun construction before January 1, 2020. Facilities that begin construction in 2017 receive 80 percent of the credit, facilities that begin construction in 2018 receive 60 percent of the credit, and facilities that begin construction in 2019 receive 40 percent of the credit. Qualified facilities producing electricity from sources other than wind must begin construction before January 1, 2017. In addition to the electricity production credit, an income tax credit is allowed for the production of refined coal for facilities placed in service before January 1, 2012. The Tax Code also provided an income tax credit for Indian coal facilities. The Indian coal facilities credit expired on December 31, 2016.

16. ***Marginal wells credit.***—A credit is provided for crude oil and natural gas produced from a qualified marginal well. A marginal well is one that does not produce more than 1,095 barrel-of-oil equivalents per year, with this limit adjusted proportionately for the number of days the well is in production. The credit is no more than $3.00 per barrel of qualified crude oil production and $0.50 per thousand cubic feet of qualified natural gas production. The credit for natural gas is reduced in proportion to the amount by which the reference price of natural gas at the wellhead for the previous calendar year exceeds $1.67 per thousand cubic feet and is zero for a reference price that exceeds $2.00. The credit for crude oil is reduced in proportion to the amount by which the reference price of oil for the previous calendar year exceeds $15.00 per barrel and is zero for a reference price that exceeds $18.00. All dollar amounts are adjusted for inflation from 2004.

17. ***Energy investment credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. However, the Tax Code provides credits for investments in solar and geothermal energy property, qualified fuel cell power plants, stationary microturbine power plants, geothermal heat pumps, small wind property and combined heat and power property. A temporary credit of up to 30 percent is available for certain qualified property placed in service before January 1, 2017. For solar energy, a temporary credit is available for property for which construction begins before January 1, 2022, and which is placed in service before January 1, 2024. The credit is 30 percent for property that begins construction

before 2020, 26 percent for property that begins construction in 2020, and 22 percent for property that begins construction in 2021. A permanent 10 percent credit is available for geothermal property placed in service after December 31, 2017 and for qualified solar property for which construction begins after December 31, 2021 or that is placed in service after December 31, 2023. . Owners of renewable power facilities that qualify for the energy production credit may instead elect to take an energy investment credit at a rate specified by law.

18. ***Alcohol fuel credits.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code provided an income tax credit for qualified cellulosic biofuel production which was renamed the Second generation biofuel producer credit. This provision expired on December 31, 2016.

19. ***Bio-diesel and small agri-biodiesel producer tax credits.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. However, the Tax Code allowed an income tax credit for Bio-diesel and for Bio-diesel derived from virgin sources. In lieu of the Bio-diesel credit, the taxpayer could claim a refundable excise tax credit. In addition, small agri-biodiesel producers were eligible for a separate income tax credit for biodiesel production and a separate credit was available for qualified renewable diesel fuel mixtures. This provision expired on December 31, 2016.

20. ***Tax credits for clean-fuel burning vehicles and refueling property.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code allows credits for plug-in electric-drive motor vehicles, alternative fuel vehicle refueling property, two-wheeled plug-in electric vehicles, and fuel cell motor vehicles. These provisions, except for the plug-in electric-drive motor vehicle credit, expired after December 31, 2016.

21. ***Exclusion of utility conservation subsidies.***—The baseline tax system generally takes a comprehensive view of taxable income that includes a wide variety of (measurable) accretions to wealth. In certain circumstances, public utilities offer rate subsidies to non-business customers who invest in energy conservation measures. These rate subsidies are equivalent to payments from the utility to its customer, and so represent accretions to wealth, income that would be taxable to the customer under the baseline tax system. In contrast, the Tax Code exempts these subsidies from the non-business customer's gross income.

22. ***Credit for holding clean renewable energy bonds.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. In contrast, the Tax Code provides for the issuance of Clean Renewable Energy Bonds which entitles the bond holder to a Federal income tax credit in lieu of interest. As of March 2010, issuers of the unused authorization of such bonds could opt to receive direct payment with the yield becoming fully taxable.

23. ***Deferral of gain from dispositions of transmission property to implement FERC restructuring policy.***—The baseline tax system generally would tax gains from sale of property when realized. It would not allow an exception for particular activities or individuals. However, the Tax Code allowed electric utilities to defer gains from the sale of their transmission assets to a FERC-approved independent transmission company. The sale of property must have been made prior to January 1, 2017.

24. ***Credit for investment in clean coal facilities.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. In contrast, the Tax Code provides investment tax credits for clean coal facilities producing electricity and for industrial gasification combined cycle projects.

25. ***Temporary 50 percent expensing for equipment used in the refining of liquid fuels.***—The baseline tax system allows the taxpayer to deduct the decline in the economic value of an investment over its economic life. However, the Tax Code provided for an accelerated recovery of the cost of certain investments in refineries by allowing partial expensing of the cost, thereby giving such investments a tax advantage. Qualified refinery property must have been placed in service before January 1, 2014.

26. ***Natural gas distribution pipelines treated as 15-year property.***—The baseline tax system allows taxpayers to deduct the decline in the economic value of an investment over its economic life. However, the Tax Code allows depreciation of natural gas distribution pipelines (placed in service between 2005 and 2011) over a 15 year period. These deductions are accelerated relative to deductions based on economic depreciation.

27. ***Amortize all geological and geophysical expenditures over two years.***—The baseline tax system allows taxpayers to deduct the decline in the economic value of an investment over its economic life. However, the Tax Code allows geological and geophysical expenditures incurred in connection with oil and gas exploration in the United States to be amortized over two years for non-integrated oil companies, a span of time that is generally shorter than the economic life of the assets.

28. ***Allowance of deduction for certain energy efficient commercial building property.***—The baseline tax system would not allow deductions in lieu of normal depreciation allowances for particular investments in particular industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code allows a deduction for certain energy efficient commercial building property. The basis of such property is reduced by the amount of the deduction. This provision expired on December 31, 2016.

29. ***Credit for construction of new energy efficient homes.***—The baseline tax system would not allow

credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. However, the Tax Code allowed contractors a tax credit of $2,000 for the construction of a qualified new energy-efficient home that had an annual level of heating and cooling energy consumption at least 50 percent below the annual consumption under the 2006 International Energy Conservation Code. The credit equaled $1,000 in the case of a new manufactured home that met a 30 percent standard or requirements for EPA's Energy Star homes. This provision expired on December 31, 2016.

30. ***Credit for energy efficiency improvements to existing homes.***—The baseline tax system would not allow credits for particular activities, investments, or industries. However, the Tax Code provided an investment tax credit for expenditures made on insulation, exterior windows, and doors that improved the energy efficiency of homes and met certain standards. The Tax Code also provided a credit for purchases of advanced main air circulating fans, natural gas, propane, or oil furnaces or hot water boilers, and other qualified energy efficient property. This provision expired on December 31, 2016.

31. ***Credit for residential energy efficient property.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. However, the Tax Code provides a credit for the purchase of a qualified photovoltaic property and solar water heating property, as well as for fuel cell power plants, geothermal heat pumps and small wind property used in or placed on a residence. The credit for qualified solar electric and solar water heating property is 30 percent for property placed in service before January 1, 2020, 26 percent for property placed in service in 2020, and 22 percent for property placed in service in 2021. The credit for fuel cell, small wind, and geothermal heat pump property is 30 percent for property placed in service before January 1, 2017.

32. ***Credit for qualified energy conservation bonds.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. However, the Tax Code provides for the issuance of energy conservation bonds which entitle the bond holder to a Federal income tax credit in lieu of interest. As of March 2010, issuers of the unused authorization of such bonds could opt to receive direct payment with the yield becoming fully taxable.

33. ***Advanced energy property credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. However, the Tax Code provides a 30 percent investment credit for property used in a qualified advanced energy manufacturing project. The Treasury Department may award up to $2.3 billion in tax credits for qualified investments.

34. ***Advanced nuclear power facilities production credit.***—The baseline tax system would not allow credits or deductions for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code allows a tax credit equal to 1.8 cents times the number of kilowatt hours of electricity produced at a qualifying advanced nuclear power facility. A taxpayer may claim no more than $125 million per 1,000 megawatts of capacity. The Treasury Department may allocate up to 6,000 megawatts of credit-eligible capacity.

35. ***Reduced tax rate for nuclear decommissioning funds.***—The baseline tax system would uniformly tax all returns to investments and not allow special rates for particular activities, investments, or industries. In contrast, the Tax Code provides a special 20% tax rate for investments made by Nuclear Decommissioning Reserve Funds.

Natural Resources and Environment

36. ***Expensing of exploration and development costs, nonfuel minerals.***—The baseline tax system allows the taxpayer to deduct the depreciation of an asset according to the decline in its economic value over time. However, certain capital outlays associated with exploration and development of nonfuel minerals may be expensed rather than depreciated over the life of the asset.

37. ***Excess of percentage over cost depletion, nonfuel minerals.***—The baseline tax system allows the taxpayer to deduct the decline in the economic value of an investment over time. Under current law, however, most nonfuel mineral extractors may use percentage depletion (whereby the deduction is fixed as a percentage of revenue) rather than cost depletion, with percentage depletion rates ranging from 22 percent for sulfur to 5 percent for sand and gravel. Over the life of an investment, percentage depletion deductions can exceed the cost of the investment. Consequently, percentage depletion offers more generous tax treatment than would cost depletion, which would limit deductions to an investment's cost.

38. ***Exclusion of interest on bonds for water, sewage, and hazardous waste facilities.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows interest earned on State and local bonds used to finance construction of sewage, water, or hazardous waste facilities to be exempt from tax. These bonds are generally subject to the State private-activity-bond annual volume cap.

39. ***Capital gains treatment of certain timber.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low tax rates to apply to certain types or sources of income. However, under current law certain timber sales can be treated as a capital gain rather than ordinary income and therefore subject to the lower capital-gains tax rate. For individuals, tax rates on regular income vary from 10 percent to 39.6 percent (plus a 3.8-percent surtax on high income taxpayers), depending on the taxpayer's income. In contrast, current law allows capital gains to be taxed at a preferentially low rate that is no higher than 20 percent (plus the 3.8-percent surtax).

40. ***Expensing of multi-period timber growing costs.***—The baseline tax system requires the taxpayer to capitalize costs associated with investment property. However, most of the production costs of growing timber may be expensed under current law rather than capitalized and deducted when the timber is sold, thereby accelerating cost recovery.

41. ***Tax incentives for preservation of historic structures.***—The baseline tax system would not allow credits for particular activities, investments, or industries. However, expenditures to preserve and restore certified historic structures qualify for an investment tax credit of 20 percent under current law for certified rehabilitation activities. The taxpayer's recoverable basis must be reduced by the amount of the credit.

42. ***Industrial CO_2 capture and sequestration tax credit***.—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. In contrast, the Tax Code allows a credit for qualified carbon dioxide captured at a qualified facility and disposed of in secure geological storage. In addition, the provision allows a credit for qualified carbon dioxide that is captured at a qualified facility and used as a tertiary injectant in a qualified enhanced oil or natural gas recovery project. The credit is not allowed after the end of the calendar year in which 75 million metric tons of qualified carbon dioxide are certified as having been taken into account.

43. ***Deduction for endangered species recovery expenditures.***—The baseline tax system would not allow deductions in addition to normal depreciation allowances for particular investments in particular industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, under current law farmers can deduct up to 25 percent of their gross income for expenses incurred as a result of site and habitat improvement activities that will benefit endangered species on their farm land, in accordance with site specific management actions included in species recovery plans approved pursuant to the Endangered Species Act of 1973.

Agriculture

44. ***Expensing of certain capital outlays.***—The baseline tax system requires the taxpayer to capitalize costs associated with investment property. However, farmers may expense certain expenditures for feed and fertilizer, for soil and water conservation measures and certain other capital improvements under current law.

45. ***Expensing of certain multiperiod production costs.***—The baseline tax system requires the taxpayer to capitalize costs associated with an investment over time. However, the production of livestock and crops with a production period greater than two years is exempt from the uniform cost capitalization rules (e.g., for costs for establishing orchards or structure improvements), thereby accelerating cost recovery.

46. ***Treatment of loans forgiven for solvent farmers.***—Because loan forgiveness increases a debtors net worth the baseline tax system requires debtors to include the amount of loan forgiveness as income or else reduce their recoverable basis in the property related to the loan. If the amount of forgiveness exceeds the basis, the excess forgiveness is taxable if the taxpayer is not insolvent. For bankrupt debtors, the amount of loan forgiveness reduces carryover losses, unused credits, and then basis, with the remainder of the forgiven debt excluded from taxation. Qualified farm debt that is forgiven, however, is excluded from income even when the taxpayer is solvent.

47. ***Capital gains treatment of certain income.***—For individuals, tax rates on regular income vary from 10 percent to 39.6 percent (plus a 3.8-percent surtax on high income taxpayers), depending on the taxpayer's income. The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low tax rates to apply to certain types or sources of income. In contrast, current law allows capital gains to be taxed at a preferentially low rate that is no higher than 20 percent (plus the 3.8-percent surtax). Certain agricultural income, such as unharvested crops, qualify for taxation as capital gains rather than ordinary income, and so benefit from the preferentially low 20 percent maximum tax rate on capital gains.

48. ***Income averaging for farmers.***—The baseline tax system generally taxes all earned income each year at the rate determined by the income tax. However, taxpayers may average their taxable income from farming and fishing over the previous three years.

49. ***Deferral of gain on sales of farm refiners.***—The baseline tax system generally subjects capital gains to taxes the year that they are realized. However, the Tax Code allows a taxpayer who sells stock in a farm refiner to a farmers' cooperative to defer recognition of the gain if the proceeds are re-invested in a qualified replacement property.

50. ***Expensing of reforestation expenditures***.—The baseline tax system requires the taxpayer to capitalize costs associated with an investment over time. In contrast, the Tax Code provides for the expensing of the first $10,000 in reforestation expenditures with 7-year amortization of the remaining expenses.

Commerce and Housing

This category includes a number of tax expenditure provisions that also affect economic activity in other functional categories. For example, provisions related to investment, such as accelerated depreciation, could be classified under the energy, natural resources and environment, agriculture, or transportation categories.

51. ***Exemption of credit union income.***—Under the baseline tax system, corporations pay taxes on their profits under the regular tax rate schedule. However, in the Tax Code the earnings of credit unions not distributed to members as interest or dividends are exempt from the income tax.

52. ***Exclusion of life insurance death benefits.***—Under the baseline tax system, individuals and

corporations would pay taxes on their income when it is (actually or constructively) received or accrued. Nevertheless, current law excludes from tax amounts received under life insurance contracts if such amounts are paid by reason of the death of the insured.

53. ***Exclusion or special alternative tax for small property and casualty insurance companies.***— The baseline tax system would require corporations to pay taxes on their profits under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. Under current law, however, stock non-life insurance companies are generally exempt from tax if their gross receipts for the taxable year do not exceed $600,000 and more than 50 percent of such gross receipts consist of premiums. Mutual non-life insurance companies are generally tax-exempt if their annual gross receipts do not exceed $150,000 and more than 35 percent of gross receipts consist of premiums. Also, non-life insurance companies with no more than $2.25 million of annual net written premiums generally may elect to pay tax only on their taxable investment income. Their underwriting income (premiums, less insurance losses and expenses) is excluded from tax.

54. ***Tax exemption of insurance income earned by tax-exempt organizations.***—Under the baseline tax system, corporations pay taxes on their profits under the regular tax rate schedule. The baseline tax system would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. Generally the income generated by life and property and casualty insurance companies is subject to tax, albeit under special rules. However, income from insurance operations conducted by such exempt organizations as fraternal societies, voluntary employee benefit associations, and others are exempt from tax.

55. ***Small life insurance company deduction.***— The baseline tax system would require corporations to pay taxes on their profits under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. Under current law, small life insurance companies (with gross assets of less than $500 million) can deduct 60 percent of the first $3 million of otherwise taxable income. The deduction phases out for otherwise taxable income between $3 million and $15 million.

56. ***Exclusion of interest spread of financial institutions.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. Consumers pay for some deposit-linked services, such as check cashing, by accepting a below-market interest rate on their demand deposits. If they received a market rate of interest on those deposits and paid explicit fees for the associated services, they would pay taxes on the full market rate and (unlike businesses) could not deduct the fees. The Government thus foregoes tax on the difference between the risk-free market interest rate and below-market interest rates on demand deposits, which under competitive conditions should equal the value added of deposit services.

57. ***Exclusion of interest on owner-occupied mortgage subsidy bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows interest earned on State and local bonds used to finance homes purchased by first-time, low-to-moderate-income buyers to be exempt from tax. These bonds are generally subject to the State private-activity-bond annual volume cap.

58. ***Exclusion of interest on rental housing bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows interest earned on State and local government bonds used to finance multifamily rental housing projects to be tax-exempt.

59. ***Mortgage interest expense on owner-occupied residences.***—Under the baseline tax system, expenses incurred in earning income would be deductible. However, such expenses would not be deductible when the income or the return on an investment is not taxed. In contrast, the Tax Code allows an exclusion from a taxpayer's taxable income for the value of owner-occupied housing services and also allows the owner-occupant to deduct mortgage interest paid on his or her primary residence and one secondary residence as an itemized non-business deduction. In general, the mortgage interest deduction is limited to interest on debt no greater than the owner's basis in the residence, and is also limited to interest on debt of no more than $1 million. Interest on up to $100,000 of other debt secured by a lien on a principal or second residence is also deductible, irrespective of the purpose of borrowing, provided the total debt does not exceed the fair market value of the residence. As an alternative to the deduction, holders of qualified Mortgage Credit Certificates issued by State or local governmental units or agencies may claim a tax credit equal to a proportion of their interest expense.

60. ***Deduction for property taxes on real property.***—Under the baseline tax system, expenses incurred in earning income would be deductible. However, such expenses would not be deductible when the income or the return on an investment is not taxed. In contrast, the Tax Code allows an exclusion from a taxpayer's taxable income for the value of owner-occupied housing services and also allows the owner-occupant to deduct property taxes paid on real property.

61. ***Deferral of income from installment sales.***— The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates, or deferral of tax, to apply to certain types or sources of income. Dealers in real and personal property (i.e., sellers who regularly hold property for sale or resale) cannot defer taxable income from installment sales until the receipt of the loan repayment. Nondealers (i.e., sellers of real property used in their business) are required to pay interest on deferred taxes attributable to their total installment obligations in

excess of $5 million. Only properties with sales prices exceeding $150,000 are includable in the total. The payment of a market rate of interest eliminates the benefit of the tax deferral. The tax exemption for nondealers with total installment obligations of less than $5 million is, therefore, a tax expenditure.

62. ***Capital gains exclusion on home sales.***—The baseline tax system would not allow deductions and exemptions for certain types of income. In contrast, the Tax Code allows homeowners to exclude from gross income up to $250,000 ($500,000 in the case of a married couple filing a joint return) of the capital gains from the sale of a principal residence. To qualify, the taxpayer must have owned and used the property as the taxpayer's principal residence for a total of at least two of the five years preceding the date of sale. In addition, the exclusion may not be used more than once every two years.

63. ***Exclusion of net imputed rental income.***—Under the baseline tax system, the taxable income of a taxpayer who is an owner-occupant would include the implicit value of gross rental income on housing services earned on the investment in owner-occupied housing and would allow a deduction for expenses, such as interest, depreciation, property taxes, and other costs, associated with earning such rental income. In contrast, the Tax Code allows an exclusion from taxable income for the implicit gross rental income on housing services, while in certain circumstances allows a deduction for some costs associated with such income, such as for mortgage interest and property taxes.

64. ***Exception from passive loss rules for $25,000 of rental loss.***—The baseline tax system accepts current law's general rule limiting taxpayers' ability to deduct losses from passive activities against nonpassive income (e.g., wages, interest, and dividends). Passive activities generally are defined as those in which the taxpayer does not materially participate and there are numerous additional considerations brought to bear on the determination of which activities are passive for a given taxpayer. Losses are limited in an attempt to limit tax sheltering activities. Passive losses that are unused may be carried forward and applied against future passive income. In contrast to the general restrictions on passive losses, the Tax Code exempts certain owners of rental real estate activities from "passive income" limitations. The exemption is limited to $25,000 in losses and phases out for taxpayers with income between $100,000 and $150,000.

65. ***Credit for low-income housing investments.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. However, under current law taxpayers who invest in certain low-income housing are eligible for a tax credit. The credit rate is set so that the present value of the credit is equal to 70 percent for new construction and 30 percent for (1) housing receiving other Federal benefits (such as tax-exempt bond financing), or (2) substantially rehabilitated existing housing. The credit can exceed these levels in certain statutorily defined and State designated areas where project development costs are higher. The credit is allowed in equal amounts over 10 years and is generally subject to a volume cap.

66. ***Accelerated depreciation on rental housing.***—Under an economic income tax, the costs of acquiring a building are capitalized and depreciated over time in accordance with the decline in the property's economic value due to wear and tear or obsolescence. This insures that the net income from the rental property is measured appropriately each year. Current law allows depreciation that is accelerated relative to economic depreciation. However, the depreciation provisions of the Tax Code are part of the reference law rules, and thus do not give rise to tax expenditures under reference law. Under normal law, in contrast, depreciation allowances reflect estimates of economic depreciation.

67. ***Discharge of mortgage indebtedness.***—Under the baseline tax system, all income would generally be taxed under the regular tax rate schedule. The baseline tax system would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allowed an exclusion from a taxpayer's taxable income for any discharge of indebtedness of up to $2 million ($1 million in the case of a married individual filing a separate return) from a qualified principal residence. The provision applied to debt discharged after January 1, 2007, and before January 1, 2017.

68. ***Discharge of business indebtedness.***—Under the baseline tax system, all income would generally be taxed under the regular tax rate schedule. The baseline tax system would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows an exclusion from a taxpayer's taxable income for any discharge of qualified real property business indebtedness by taxpayers other than a C corporation. If the canceled debt is not reported as current income, however, the basis of the underlying property must be reduced by the amount canceled.

69. ***Exceptions from imputed interest rules.***—Under the baseline tax system, holders (issuers) of debt instruments are generally required to report interest earned (paid) in the period it accrues, not when received. In addition, the amount of interest accrued is determined by the actual price paid, not by the stated principal and interest stipulated in the instrument. But under current law, any debt associated with the sale of property worth less than $250,000 is exempted from the general interest accounting rules. This general $250,000 exception is not a tax expenditure under reference law but is under normal law. Current law also includes exceptions for certain property worth more than $250,000. These are tax expenditure under reference law and normal law. These exceptions include, sales of personal residences worth more than $250,000, and sales of farms and small businesses worth between $250,000 and $1 million.

70. ***Treatment of qualified dividends.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low tax rates to apply to certain types or sources of income. For individuals, tax rates on regular income vary from 10 percent to 39.6 percent (plus a 3.8-percent

surtax on high income taxpayers), depending on the taxpayer's income. In contrast, under current law, qualified dividends are taxed at a preferentially low rate that is no higher than 20 percent (plus the 3.8-percent surtax).

71. ***Capital gains (except agriculture, timber, iron ore, and coal).***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low tax rates to apply to certain types or sources of income. For individuals, tax rates on regular income vary from 10 percent to 39.6 percent (plus a 3.8-percent surtax on high income taxpayers), depending on the taxpayer's income. In contrast, under current law, capital gains on assets held for more than one year are taxed at a preferentially low rate that is no higher than 20 percent (plus the 3.8-percent surtax).

72. ***Capital gains exclusion of small corporation stock.***—The baseline tax system would not allow deductions and exemptions, or provide preferential treatment of certain sources of income or types of activities. In contrast, the Tax Code provided an exclusion of 50 percent, applied to ordinary rates with a maximum of a 28 percent tax rate, for capital gains from qualified small business stock held by individuals for more than 5 years; 75 percent for stock issued after February 17, 2009 and before September 28, 2010; and 100 percent for stock issued after September 27, 2010. A qualified small business is a corporation whose gross assets do not exceed $50 million as of the date of issuance of the stock.

73. ***Step-up basis of capital gains at death.***—Under the baseline tax system, unrealized capital gains would be taxed when assets are transferred at death. It would not allow for exempting gains upon transfer of the underlying assets to the heirs. In contrast, capital gains on assets held at the owner's death are not subject to capital gains tax under current law. The cost basis of the appreciated assets is adjusted to the market value at the owner's date of death which becomes the basis for the heirs.

74. ***Carryover basis of capital gains on gifts.***—Under the baseline tax system, unrealized capital gains would be taxed when assets are transferred by gift. In contrast, when a gift of appreciated asset is made under current law, the donor's basis in the transferred property (the cost that was incurred when the transferred property was first acquired) carries over to the donee. The carryover of the donor's basis allows a continued deferral of unrealized capital gains.

75. ***Deferral of capital gains from like-kind exchanges.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates, or deferral of tax, to apply to certain types or sources of income. In contrast, current law allows the deferral of accrued gains on assets transferred in qualified like-kind exchanges.

76. ***Ordinary income treatment of loss from small business corporation stock sale.***—The baseline tax system limits to $3,000 the write-off of losses from capital assets, with carryover of the excess to future years. In contrast, the Tax Code allows up to $100,000 in losses from the sale of small business corporate stock (capitalization less than $1 million) to be treated as ordinary losses and fully deducted.

77. ***Depreciation of buildings other than rental housing.***—Under an economic income tax, the costs of acquiring a building are capitalized and depreciated over time in accordance with the decline in the property's economic value due to wear and tear or obsolescence. This insures that the net income from the property is measured appropriately each year. Current law allows depreciation deductions that differ from those under economic depreciation. However, the depreciation provisions of the Tax Code are part of the reference law rules, and thus do not give rise to tax expenditures under reference law. Under normal law, in contrast, depreciation allowances reflect estimates of economic depreciation.

78. ***Accelerated depreciation of machinery and equipment.***—Under an economic income tax, the costs of acquiring machinery and equipment are capitalized and depreciated over time in accordance with the decline in the property's economic value due to wear and tear or obsolescence. This insures that the net income from the property is measured appropriately each year. Current law allows depreciation deductions that are accelerated relative to economic depreciation. However, the depreciation provisions of the Tax Code are part of the reference law rules, and thus do not give rise to tax expenditures under reference law. Under normal law, in contrast depreciation allowances reflect estimates of economic depreciation.

79. ***Expensing of certain small investments.***—Under the reference law baseline, the costs of acquiring tangible property and computer software would be depreciated using the Tax Code's depreciation provisions. Under the normal tax baseline, depreciation allowances are estimates of economic depreciation. However, the Tax Code allows qualifying investments by small businesses in tangible property and certain computer software to be expensed rather than depreciated over time.

80. ***Graduated corporation income tax rate.***—Because the corporate rate schedule is part of reference tax law, it is not considered a tax expenditure under the reference method. A flat corporation income tax rate is taken as the baseline under the normal tax method; therefore the lower rate is considered a tax expenditure under this concept.

81. ***Exclusion of interest on small issue bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows interest earned on small issue industrial development bonds (IDBs) issued by State and local governments to finance manufacturing facilities to be tax exempt. Depreciable property financed with small issue IDBs must be depreciated, however, using the straight-line method. The annual volume of small issue IDBs is subject to the unified volume cap discussed in the mortgage housing bond section above.

82. ***Deduction for U.S. production activities.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow

preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows for a deduction equal to a portion of taxable income attributable to domestic production.

83. ***Special rules for certain film and TV production.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow deductions and exemptions or preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allowed taxpayers to deduct up to $15 million per production ($20 million in certain distressed areas) in non-capital expenditures incurred during the year. This provision expired at the end of 2016.

Transportation

84. ***Tonnage tax.***—The baseline tax system generally would tax all profits and income under the regular tax rate schedule. U.S. shipping companies may choose to be subject to a tonnage tax based on gross shipping weight in lieu of an income tax, in which case profits would not be subject to tax under the regular tax rate schedule.

85. ***Deferral of tax on shipping companies.***—The baseline tax system generally would tax all profits and income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows certain companies that operate U.S. flag vessels to defer income taxes on that portion of their income used for shipping purposes (e.g., primarily construction, modernization and major repairs to ships, and repayment of loans to finance these investments).

86. ***Exclusion of reimbursed employee parking expenses.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, would be included in taxable income. Dedicated payments and in-kind benefits represent accretions to wealth that do not differ materially from cash wages. In contrast, the Tax Code allows an exclusion from taxable income for employee parking expenses that are paid for by the employer or that are received by the employee in lieu of wages. In 2017, the maximum amount of the parking exclusion is $255 per month. The tax expenditure estimate does not include any subsidy provided through employer-owned parking facilities.

87. ***Exclusion for employer-provided transit passes.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, would be included in taxable income. Dedicated payments and in-kind benefits represent accretions to wealth that do not differ materially from cash wages. In contrast, the Tax Code allows an exclusion from a taxpayer's taxable income for passes, tokens, fare cards, and vanpool expenses that are paid for by an employer or that are received by the employee in lieu of wages to defray an employee's commuting costs. Due to a parity to parking provision, the maximum amount of the transit exclusion is $255 per month in 2017.

88. ***Tax credit for certain expenditures for maintaining railroad tracks.***—The baseline tax system would not allow credits for particular activities, investments, or industries. However, the Tax Code allowed eligible taxpayers to claim a credit equal to the lesser of 50 percent of maintenance expenditures and the product of $3,500 and the number of miles of track owned or leased. This provision applies to maintenance expenditures in taxable years beginning before January 1, 2017.

89. ***Exclusion of interest on bonds for Highway Projects and rail-truck transfer facilities.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code provides for $15 billion of tax-exempt bond authority to finance qualified highway or surface freight transfer facilities.

Community and Regional Development

90. ***Investment credit for rehabilitation of structures.***—The baseline tax system would uniformly tax all returns to investments and not allow credits for particular activities, investments, or industries. However, the Tax Code allows a 10-percent investment tax credit for the rehabilitation of buildings that are used for business or productive activities and that were erected before 1936 for other than residential purposes. The taxpayer's recoverable basis must be reduced by the amount of the credit.

91. ***Exclusion of interest for airport, dock, and similar bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allows interest earned on State and local bonds issued to finance high-speed rail facilities and Government-owned airports, docks, wharves, and sport and convention facilities to be tax-exempt. These bonds are not subject to a volume cap.

92. ***Exemption of certain mutuals' and cooperatives' income.***—Under the baseline tax system, corporations pay taxes on their profits under the regular tax rate schedule. In contrast, the Tax Code provides for the incomes of mutual and cooperative telephone and electric companies to be exempt from tax if at least 85 percent of their revenues are derived from patron service charges.

93. ***Empowerment zones.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low tax rates to apply to certain types or sources of income, tax credits, and write-offs faster than economic depreciation. In contrast, the Tax Code allowed qualifying businesses in designated economically depressed areas to receive tax benefits such as an employment credit, increased expensing of investment in equipment, special tax-exempt financing, and certain capital gains incentives. A taxpayer's ability to accrue new tax benefits for empowerment zones expired on December 31, 2016.

94. ***New markets tax credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. However, the Tax Code allowed taxpayers who made qualified equity investments in a community development entity (CDE), which then made qualified investments in low-income communities, to be eligible for a tax credit that is received over 7 years. The total equity investment available for the credit across all CDEs is $3.5 billion for each calendar year 2010 through 2019, the last year for which credit allocations are authorized.

95. ***Credit to holders of Gulf and Midwest Tax Credit Bonds.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, under current law taxpayers that own Gulf and Midwest Tax Credit bonds receive a non-refundable tax credit rather than interest. The credit is included in gross income.

96. ***Recovery Zone Bonds.***—The baseline tax system would not allow credits for particular activities, investments, or industries. In addition, it would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code allowed local governments to issue up $10 billion in taxable Recovery Zone Economic Development Bonds in 2009 and 2010 and receive a direct payment from Treasury equal to 45 percent of interest expenses. In addition, local governments could issue up to $15 billion in tax exempt Recovery Zone Facility Bonds. These bonds financed certain kinds of business development in areas of economic distress.

97. ***Tribal Economic Development Bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, the Tax Code was modified in 2009 to allow Indian tribal governments to issue tax exempt "tribal economic development bonds." There is a national bond limitation of $2 billion on such bonds.

Education, Training, Employment, and Social Services

98. ***Exclusion of scholarship and fellowship income.***—Scholarships and fellowships are excluded from taxable income to the extent they pay for tuition and course-related expenses of the grantee. Similarly, tuition reductions for employees of educational institutions and their families are not included in taxable income. From an economic point of view, scholarships and fellowships are either gifts not conditioned on the performance of services, or they are rebates of educational costs. Thus, under the baseline tax system of the reference law method, this exclusion is not a tax expenditure because this method does not include either gifts or price reductions in a taxpayer's gross income. The exclusion, however, is considered a tax expenditure under the normal tax method, which includes gift-like transfers of Government funds in gross income (many scholarships are derived directly or indirectly from Government funding).

99. ***Tax credits and deductions for post-secondary education expenses.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Under current law in 2017, however, there were two credits for certain post-secondary education expenses. A deduction for post-secondary expenses expired at the end of 2016. The American Opportunity Tax Credit allows a partially refundable credit of up to $2,500 per eligible student for qualified tuition and related expenses paid during each of the first four years of the student's post-secondary education. The credit is phased out for taxpayers with modified adjusted gross income between $160,000 and $180,000 if married filing jointly ($80,000 and $90,000 for other taxpayers), not indexed. The Lifetime Learning Credit allows a non-refundable credit for 20 percent of an eligible student's qualified tuition and fees, up to a maximum credit per return of $2,000. In 2017, the credit is phased out ratably for taxpayers with modified AGI between $112,000 and $132,000 if married filing jointly ($56,000 and $66,000 for other taxpayers), indexed. The credit can be claimed in any year in which post-secondary education expenses are incurred. The deduction for post-secondary education expenses provides a maximum deduction of $4,000 for qualified post-secondary education expenses for taxpayers with modified adjusted gross income up to $130,000 if married filing jointly ($65,000 for other taxpayers). Taxpayers with modified adjusted gross income up to $160,000 if married filing jointly ($80,000 for other taxpayers) could deduct up to $2,000 of qualified post-secondary education expenses. This provision expired on December 31, 2016.

100. ***Education Individual Retirement Accounts (IRA).***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. While contributions to an education IRA are not tax-deductible under current law, investment income earned by education IRAs is not taxed when earned, and investment income from an education IRA is tax-exempt when withdrawn to pay for a student's education expenses. The maximum contribution to an education IRA in 2017 is $2,000 per beneficiary. In 2017, the maximum contribution is phased down ratably for taxpayers with modified AGI between $190,000 and $220,000 if married filing jointly ($95,000 and $110,000 for other taxpayers).

101. ***Deductibility of student loan interest.***—The baseline tax system accepts current law's general rule limiting taxpayers' ability to deduct non-business interest expenses. In contrast, taxpayers may claim an above-the-line deduction of up to $2,500 on interest paid on an education loan. In 2017, the maximum deduction is phased down ratably for taxpayers with modified AGI between $135,000 and $165,000 if married filing jointly ($65,000 and $80,000 for other taxpayers).

102. ***Qualified tuition programs.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low

(or zero) tax rates to apply to certain types or sources of income. Some States have adopted prepaid tuition plans, prepaid room and board plans, and college savings plans, which allow persons to pay in advance or save for college expenses for designated beneficiaries. Under current law, investment income, or the return on prepayments, is not taxed when earned, and is tax-exempt when withdrawn to pay for qualified expenses.

103. ***Exclusion of interest on student-loan bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, interest earned on State and local bonds issued to finance student loans is tax-exempt under current law. The volume of all such private activity bonds that each State may issue annually is limited.

104. ***Exclusion of interest on bonds for private nonprofit educational facilities.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, under current law interest earned on State and local Government bonds issued to finance the construction of facilities used by private nonprofit educational institutions is not taxed.

105. ***Credit for holders of zone academy bonds.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Under current law, however, financial institutions that own zone academy bonds receive a non-refundable tax credit rather than interest. The credit is included in gross income. Proceeds from zone academy bonds may only be used to renovate, but not construct, qualifying schools and for certain other school purposes. The total amount of zone academy bonds that may be issued was limited to $1.4 billion in 2009 and 2010. As of March 2010, issuers of the unused authorization of such bonds could opt to receive direct payment with the yield becoming fully taxable. An additional $0.4 billion of these bonds with a tax credit was authorized to be issued each year in 2011 through 2016.

106. ***Exclusion of interest on savings bonds redeemed to finance educational expenses.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. Under current law, however, interest earned on U.S. savings bonds issued after December 31, 1989 is tax-exempt if the bonds are transferred to an educational institution to pay for educational expenses. The tax exemption is phased out for taxpayers with AGI between $117,250 and $147,250 if married filing jointly ($78,150 and $93,150 for other taxpayers) in 2017.

107. ***Parental personal exemption for students age 19 or over.***—Under the baseline tax system, a personal exemption would be allowed for the taxpayer, as well as for the taxpayer's spouse and dependents who do not claim a personal exemption on their own tax returns. To be considered a dependent, a child would have to be under age 19. In contrast, the Tax Code allows taxpayers to claim personal exemptions for children aged 19 to 23, as long as the children are full-time students and reside with the taxpayer for over half the year (with exceptions for temporary absences from home, such as for school attendance).

108. ***Charitable contributions to educational institutions.***—The baseline tax system would not allow a deduction for personal expenditures. In contrast, the Tax Code provides taxpayers a deduction for contributions to nonprofit educational institutions that are similar to personal expenditures. Moreover, taxpayers who donate capital assets to educational institutions can deduct the asset's current value without being taxed on any appreciation in value. An individual's total charitable contribution generally may not exceed 50 percent of adjusted gross income; a corporation's total charitable contributions generally may not exceed 10 percent of pre-tax income.

109. ***Exclusion of employer-provided educational assistance.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income because they represent accretions to wealth that do not materially differ from cash wages. Under current law, however, employer-provided educational assistance is excluded from an employee's gross income, even though the employer's costs for this assistance are a deductible business expense. The maximum exclusion is $5,250 per taxpayer.

110. ***Special deduction for teacher expenses.***—The baseline tax system would not allow a deduction for personal expenditures. In contrast, the Tax Code allowed educators in both public and private elementary and secondary schools, who worked at least 900 hours during a school year as a teacher, instructor, counselor, principal or aide, to subtract up to $250 of qualified expenses, indexed to 2014, when determining their adjusted gross income (AGI).

111. ***Discharge of student loan indebtedness.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, the Tax Code allows certain professionals who perform in underserved areas or specific fields, and as a consequence have their student loans discharged, not to recognize such discharge as income.

112. ***Qualified school construction bonds.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code was modified in 2009 to provide a tax credit in lieu of interest to holders of qualified school construction bonds. The national volume limit is $22.4 billion over 2009 and 2010. As of March 2010, issuers of such bonds could opt to receive direct payment with the yield becoming fully taxable.

113. ***Work opportunity tax credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code provides employers with a tax credit for qualified wages paid to individuals.

The credit applies to employees who began work on or before December 31, 2019 and who are certified as members of various targeted groups. The amount of the credit that can be claimed is 25 percent of qualified wages for employment less than 400 hours and 40 percent for employment of 400 hours or more. Generally, the maximum credit per employee is $2,400 and can only be claimed on the first year of wages an individual earns from an employer. However, the credit for long-term welfare recipients can be claimed on second year wages as well and has a $9,000 maximum. Also, certain categories of veterans are eligible for a higher maximum credit of up to $9,600. Employers must reduce their deduction for wages paid by the amount of the credit claimed.

114. ***Employer-provided child care exclusion.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, under current law up to $5,000 of employer-provided child care is excluded from an employee's gross income even though the employer's costs for the child care are a deductible business expense.

115. ***Employer-provided child care credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. In contrast, current law provides a credit equal to 25 percent of qualified expenses for employee child care and 10 percent of qualified expenses for child care resource and referral services. Employer deductions for such expenses are reduced by the amount of the credit. The maximum total credit is limited to $150,000 per taxable year.

116. ***Assistance for adopted foster children.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. Taxpayers who adopt eligible children from the public foster care system can receive monthly payments for the children's significant and varied needs and a reimbursement of up to $2,000 for nonrecurring adoption expenses; special needs adoptions receive the maximum benefit even if that amount is not spent. These payments are excluded from gross income under current law.

117. ***Adoption credit and exclusion.***—The baseline tax system would not allow credits for particular activities. In contrast, taxpayers can receive a tax credit for qualified adoption expenses under current law. Taxpayers may also exclude qualified adoption expenses provided or reimbursed by an employer from income, subject to the same maximum amounts and phase-out as the credit. The same expenses cannot qualify for tax benefits under both programs; however, a taxpayer may use the benefits of the exclusion and the tax credit for different expenses.

118. ***Exclusion of employee meals and lodging.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, under current law employer-provided meals and lodging are excluded from an employee's gross income even though the employer's costs for these items are a deductible business expense.

119. ***Credit for child and dependent care expenses.***—The baseline tax system would not allow credits for particular activities or targeted at specific groups. In contrast, the Tax Code provides parents who work or attend school and who have child and dependent care expenses a tax credit. Expenditures up to a maximum $3,000 for one dependent and $6,000 for two or more dependents are eligible for the credit. The credit is equal to 35 percent of qualified expenditures for taxpayers with incomes of up to $15,000. The credit is reduced to a minimum of 20 percent by one percentage point for each $2,000 of income in excess of $15,000.

120. ***Credit for disabled access expenditures.***—The baseline tax system would not allow credits for particular activities, investments, or industries. In contrast, the Tax Code provides small businesses (less than $1 million in gross receipts or fewer than 31 full-time employees) a 50-percent credit for expenditures in excess of $250 to remove access barriers for disabled persons. The credit is limited to $5,000.

121. ***Deductibility of charitable contributions, other than education and health.***—The baseline tax system would not allow a deduction for personal expenditures including charitable contributions. In contrast, the Tax Code provides taxpayers a deduction for contributions to charitable, religious, and certain other nonprofit organizations. Taxpayers who donate capital assets to charitable organizations can deduct the assets' current value without being taxed on any appreciation in value. An individual's total charitable contribution generally may not exceed 50 percent of adjusted gross income; a corporation's total charitable contributions generally may not exceed 10 percent of pre-tax income.

122. ***Exclusion of certain foster care payments.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. Foster parents provide a home and care for children who are wards of the State, under contract with the State. Under current law, compensation received for this service is excluded from the gross incomes of foster parents; the expenses they incur are nondeductible.

123. ***Exclusion of parsonage allowances.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, would be included in taxable income. Dedicated payments and in-kind benefits represent accretions to wealth that do not differ materially from cash wages. In contrast, the Tax Code allows an exclusion from a clergyman's taxable income for the value of the clergyman's housing allowance or the rental value of the clergyman's parsonage.

124. ***Indian employment credit.***—The baseline tax system would not allow credits for particular activities, investments, or industries. Instead, it generally would seek to tax uniformly all returns from investment-like activities. In contrast, the Tax Code provides employers with a tax credit for qualified wages paid to employees

who are enrolled members of Indian tribes. The amount of the credit that could be claimed is 20 percent of the excess of qualified wages and health insurance costs paid by the employer in the current tax year over the amount of such wages and costs paid by the employer in 1993. Qualified wages and health insurance costs with respect to any employee for the taxable year could not exceed $20,000. Employees have to live on or near the reservation where he or she work to be eligible for the credit. Employers must reduce their deduction for wages paid by the amount of the credit claimed. The credit does not apply to taxable years beginning after December 31, 2016.

125. Credit for employer differential wage payments.—The baseline tax system would not allow credits for particular activities, investments, or industries. In contrast, the Tax Code provides employers with a 20 percent tax credit for eligible differential wages paid to employees who are members of the uniformed services while on active duty for more than 30 days. The amount of eligible differential wage payments made to a qualified employee in a taxable year is capped at $20,000. Employers must reduce their deduction for wages paid by the amount of the credit claimed.

Health

126. ***Exclusion of employer contributions for medical insurance premiums and medical care.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, under current law, employer-paid health insurance premiums and other medical expenses (including long-term care) are not included in employee gross income even though they are deducted as a business expense by the employee.

127. ***Self-employed medical insurance premiums.***—Under the baseline tax system, all compensation and remuneration, including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, under current law self-employed taxpayers may deduct their family health insurance premiums. Taxpayers without self-employment income are not eligible for this special deduction. The deduction is not available for any month in which the self-employed individual is eligible to participate in an employer-subsidized health plan and the deduction may not exceed the self-employed individual's earned income from self-employment.

128. ***Medical Savings Accounts and Health Savings Accounts.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. Also, the baseline tax system would not allow a deduction for personal expenditures and generally would tax investment earnings. In contrast, individual contributions to Archer Medical Savings Accounts (Archer MSAs) and Health Savings Accounts (HSAs) are allowed as a deduction in determining adjusted gross income whether or not the individual itemizes deductions. Employer contributions to Archer MSAs and HSAs are excluded from income and employment taxes. Archer MSAs and HSAs require that the individual have coverage by a qualifying high deductible health plan. Earnings from the accounts are excluded from taxable income. Distributions from the accounts used for medical expenses are not taxable. The rules for HSAs are generally more flexible than for Archer MSAs and the deductible contribution amounts are greater (in 2017, $3,350 for taxpayers with individual coverage and $6,750 for taxpayers with family coverage). Thus, HSAs have largely replaced MSAs.

129. ***Deductibility of medical expenses.***—The baseline tax system would not allow a deduction for personal expenditures. In contrast, under current law personal expenditures for medical care (including the costs of prescription drugs) exceeding 7.5 percent of the taxpayer's adjusted gross income are deductible. For tax years beginning after 2012, only medical expenditures exceeding 10 percent of the taxpayer's adjusted gross income are deductible. However, for the years 2013, 2014, 2015 and 2016, if either the taxpayer or the taxpayer's spouse turns 65 before the end of the taxable year, the threshold remains at 7.5 percent of adjusted income. Beginning in 2017, the 10-percent threshold will apply to all taxpayers, including those over 65.

130. ***Exclusion of interest on hospital construction bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, under current law interest earned on State and local government debt issued to finance hospital construction is excluded from income subject to tax.

131. ***Refundable Premium Assistance Tax Credit.***—The baseline tax system would not allow credits for particular activities or targeted at specific groups. In contrast, for taxable years ending after 2013, the Tax Code provides a premium assistance credit to any eligible taxpayer for any qualified health insurance purchased through a Health Insurance Exchange. In general, an eligible taxpayer is a taxpayer with annual household income between 100% and 400% of the Federal poverty level for a family of the taxpayer's size and that does not have access to affordable minimum essential health care coverage. The amount of the credit equals the lesser of (1) the actual premiums paid by the taxpayer for such coverage or (2) the difference between the cost of a statutorily-identified benchmark plan offered on the exchange and a required payment by the taxpayer that increases with income.

132. ***Credit for employee health insurance expenses of small business.***—The baseline tax system would not allow credits for particular activities or targeted at specific groups. In contrast, the Tax Code provides a tax credit to qualified small employers that make a certain level of non-elective contributions towards the purchase of certain health insurance coverage for its employees. To receive a credit, an employer must have fewer than 25 full-time-equivalent employees whose average annual full-time-equivalent wages from the employer are less than $50,000 (indexed for taxable years after 2013). However, to receive a full credit, an employer

must have no more than 10 full-time employees, and the average wage paid to these employees must be no more than $25,000 (indexed for taxable years after 2013). A qualifying employer may claim the credit for any taxable year beginning in 2010, 2011, 2012, and 2013 and for up to two years for insurance purchased through a Health Insurance Exchange thereafter. For taxable years beginning in 2010, 2011, 2012, and 2013, the maximum credit is 35 percent of premiums paid by qualified taxable employers and 25 percent of premiums paid by qualified tax-exempt organizations. For taxable years beginning in 2014 and later years, the maximum tax credit increases to 50 percent of premiums paid by qualified taxable employers and 35 percent of premiums paid by qualified tax-exempt organizations.

133. ***Deductibility of charitable contributions to health institutions.***—The baseline tax system would not allow a deduction for personal expenditures including charitable contributions. In contrast, the Tax Code provides individuals and corporations a deduction for contributions to nonprofit health institutions. Tax expenditures resulting from the deductibility of contributions to other charitable institutions are listed under the education, training, employment, and social services function.

134. ***Tax credit for orphan drug research.***—The baseline tax system would not allow credits for particular activities, investments, or industries. In contrast, under current law drug firms can claim a tax credit of 50 percent of the costs for clinical testing required by the Food and Drug Administration for drugs that treat rare physical conditions or rare diseases.

135. ***Special Blue Cross/Blue Shield tax benefits.***—The baseline tax system generally would tax all profits under the regular tax rate schedule using broadly applicable measures of baseline income. It would not allow preferentially low tax rates to apply to certain types or sources of income. In contrast, certain Blue Cross and Blue Shield (BC/BS) health insurance providers and certain other health insurers are provided with special tax benefits, provided that their percentage of total premium revenue expended on reimbursement for clinical services provided to enrollees or for activities that improve health care quality is not less than 85 percent for the taxable year. Qualifying insurers may take as a deduction 100 percent of any net increase in their unearned premium reserves, instead of the 80 percent allowed other insurers. Qualifying insurers are also allowed a special deduction equal to the amount by which 25 percent of an insurer's health-claim expenses exceeds its beginning-of-the-year accounting surplus. The deduction is limited to the insurer's taxable income determined without the special deduction.

136. ***Tax credit for health insurance purchased by certain displaced and retired individuals.***—The baseline tax system would not allow credits for particular activities, investments, or industries. In contrast, the Tax Code provides a refundable tax credit of 72.5 percent for the purchase of health insurance coverage by individuals eligible for Trade Adjustment Assistance and certain Pension Benefit Guarantee Corporation pension recipients. This provision will expire on December 31, 2019.

137. ***Distributions from retirement plans for premiums for health and long-term care insurance.***—Under the baseline tax system, all compensation, including dedicated and deferred payments, should be included in taxable income. In contrast, the Tax Code provides for tax-free distributions of up to $3,000 from governmental retirement plans for premiums for health and long term care premiums of public safety officers.

Income Security

138. ***Child credit.***—The baseline tax system would not allow credits for particular activities or targeted at specific groups. Under current law, however, taxpayers with children under age 17 can qualify for a $1,000 partially refundable per child credit. Any unclaimed credit due to insufficient tax liability may be refundable – taxpayers may claim a refund for 15 percent of earnings in excess of a $3,000 floor, up to the amount of unused credit. Alternatively, taxpayers with three or more children may claim a refund of the amount of payroll taxes paid in excess of the Earned Income Tax Credit received (up to the amount of unused credit) if this results in a larger refund. The credit is phased out for taxpayers at the rate of $50 per $1,000 of modified AGI above $110,000 ($75,000 for single or head of household filers and $55,000 for married taxpayers filing separately).

139. ***Exclusion of railroad Social Security equivalent benefits.***—Under the baseline tax system, all compensation, including dedicated and deferred payments, should be included in taxable income. In contrast, the Social Security Equivalent Benefit paid to railroad retirees is not generally subject to the income tax unless the recipient's gross income reaches a certain threshold under current law. See provision number 158, Social Security benefits for retired workers, for discussion of the threshold.

140. ***Exclusion of workers' compensation benefits.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. However, workers compensation is not subject to the income tax under current law.

141. ***Exclusion of public assistance benefits.***—Under the reference law baseline tax system, gifts and transfers are not treated as income to the recipients. In contrast, the normal tax method considers cash transfers from the Government as part of the recipients' income, and thus, treats the exclusion for public assistance benefits under current law as a tax expenditure.

142. ***Exclusion of special benefits for disabled coal miners.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. However, disability payments to former coal miners out of the Black Lung Trust Fund, although income to the recipient, are not subject to the income tax.

143. ***Exclusion of military disability pensions.***—Under the baseline tax system, all compensation,

including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, most of the military disability pension income received by current disabled military retirees is excluded from their income subject to tax.

144. ***Defined benefit employer plans.***—Under the baseline tax system, all compensation, including deferred and dedicated payments, should be included in taxable income. In addition, investment income would be taxed as earned. In contrast, under current law certain contributions to defined benefit pension plans are excluded from an employee's gross income even though employers can deduct their contributions. In addition, the tax on the investment income earned by defined benefit pension plans is deferred until the money is withdrawn.

145. ***Defined contribution employer plans.***—Under the baseline tax system, all compensation, including deferred and dedicated payments, should be included in taxable income. In addition, investment income would be taxed as earned. In contrast, under current law individual taxpayers and employers can make tax-preferred contributions to employer-provided 401(k) and similar plans (e.g. 403(b) plans and the Federal Government's Thrift Savings Plan). In 2017, an employee could exclude up to $18,000 of wages from AGI under a qualified arrangement with an employer's 401(k) plan. Employees age 50 or over could exclude up to $24,000 in contributions. The defined contribution plan limit, including both employee and employer contributions, is $54,000 in 2017. The tax on contributions made by both employees and employers and the investment income earned by these plans is deferred until withdrawn.

146. ***Individual Retirement Accounts (IRAs).***—Under the baseline tax system, all compensation, including deferred and dedicated payments, should be included in taxable income. In addition, investment income would be taxed as earned. In contrast, under current law individual taxpayers can take advantage of traditional and Roth IRAs to defer or otherwise reduce the tax on the return to their retirement savings. The IRA contribution limit is $5,500 in 2017; taxpayers age 50 or over are allowed to make additional "catch-up" contributions of $1,000. Contributions to a traditional IRA are generally deductible but the deduction is phased out for workers with incomes above certain levels who, or whose spouses, are active participants in an employer-provided retirement plan. Contributions and account earnings are includible in income when withdrawn from traditional IRAs. Roth IRA contributions are not deductible, but earnings and withdrawals are exempt from taxation. Income limits also apply to Roth IRA contributions.

147. ***Low and moderate-income savers' credit.***—The baseline tax system would not allow credits for particular activities or targeted at specific groups. In contrast, the Tax Code provides an additional incentive for lower-income taxpayers to save through a nonrefundable credit of up to 50 percent on IRA and other retirement contributions of up to $2,000. This credit is in addition to any deduction or exclusion. The credit is completely phased out by $62,000 for joint filers, $46,500 for head of household filers, and $31,000 for other filers in 2017.

148. ***Self-employed plans.***—Under the baseline tax system, all compensation, including deferred and dedicated payments, should be included in taxable income. In addition, investment income would be taxed as earned. In contrast, under current law self-employed individuals can make deductible contributions to their own retirement plans equal to 25 percent of their income, up to a maximum of $54,000 in 2017. Total plan contributions are limited to 25 percent of a firm's total wages. The tax on the investment income earned by self-employed SEP, SIMPLE, and qualified plans is deferred until withdrawn.

149. ***Premiums on group term life insurance.***—Under the baseline tax system, all compensation, including deferred and dedicated payments, should be included in taxable income. In contrast, under current law employer-provided life insurance benefits are excluded from an employee's gross income (to the extent that the employer's share of the total costs does not exceed the cost of $50,000 of such insurance) even though the employer's costs for the insurance are a deductible business expense.

150. ***Premiums on accident and disability insurance.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In contrast, under current law employer-provided accident and disability benefits are excluded from an employee's gross income even though the employer's costs for the benefits are a deductible business expense.

151. ***Exclusion of investment income from Supplementary Unemployment Benefit Trusts.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In addition, investment income would be taxed as earned. Under current law, employers may establish trusts to pay supplemental unemployment benefits to employees separated from employment. Investment income earned by such trusts is exempt from taxation.

152. ***Exclusion of investment income from Voluntary Employee Benefit Associations trusts.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. Under current law, employers may establish associations, or VEBAs, to pay employee benefits, which may include health benefit plans, life insurance, and disability insurance, among other employee benefits. Investment income earned by such trusts is exempt from taxation.

153. ***Special ESOP rules.***—ESOPs are a special type of tax-exempt employee benefit plan. Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income. In addition, investment income would be taxed as earned. In contrast, employer-paid contributions (the value of stock issued to the ESOP) are deductible by the employer as part of employee compensation costs. They are not included in the employees' gross income for tax purposes, however, until they are paid out as benefits.

In addition, the following special income tax provisions for ESOPs are intended to increase ownership of corporations by their employees: (1) annual employer contributions are subject to less restrictive limitations than other qualified retirement plans; (2) ESOPs may borrow to purchase employer stock, guaranteed by their agreement with the employer that the debt will be serviced by his payment (deductible by him) of a portion of wages (excludable by the employees) to service the loan; (3) employees who sell appreciated company stock to the ESOP may defer any taxes due until they withdraw benefits; (4) dividends paid to ESOP-held stock are deductible by the employer; and (5) earnings are not taxed as they accrue.

154. ***Additional deduction for the blind.***—Under the baseline tax system, the standard deduction is allowed. An additional standard deduction for a targeted group within a given filing status would not be allowed. In contrast, the Tax Code allows taxpayers who are blind to claim an additional $1,550 standard deduction if single, or $1,250 if married in 2017.

155. ***Additional deduction for the elderly.***—Under the baseline tax system, the standard deduction is allowed. An additional standard deduction for a targeted group within a given filing status would not be allowed. In contrast, the Tax Code allows taxpayers who are 65 years or older to claim an additional $1,550 standard deduction if single, or $1,250 if married in 2017.

156. ***Tax credit for the elderly and disabled.***—Under the baseline tax system, a credit targeted at a specific group within a given filing status or for particular activities would not be allowed. In contrast, the Tax Code allows taxpayers who are 65 years of age or older, or who are permanently disabled, to claim a non-refundable tax credit equal to 15 percent of the sum of their earned and retirement income. The amount to which the 15-percent rate is applied is limited to no more than $5,000 for single individuals or married couples filing a joint return where only one spouse is 65 years of age or older or disabled, and up to $7,500 for joint returns where both spouses are 65 years of age or older or disabled. These limits are reduced by one-half of the taxpayer's adjusted gross income over $7,500 for single individuals and $10,000 for married couples filing a joint return.

157. ***Deductibility of casualty losses.***—Under the baseline tax system, neither the purchase of property nor insurance premiums to protect the property's value are deductible as costs of earning income. Therefore, reimbursement for insured loss of such property is not included as a part of gross income, and uninsured losses are not deductible. In contrast, the Tax Code provides a deduction for uninsured casualty and theft losses of more than $100 each, to the extent that total losses during the year exceed 10 percent of the taxpayer's adjusted gross income.

158. ***Earned income tax credit (EITC).***—The baseline tax system would not allow credits for particular activities or targeted at specific groups. In contrast, the Tax Code provides an EITC to low-income workers at a maximum rate of 45 percent of income. For a family with one qualifying child, the credit is 34 percent of the first $10,000 of earned income in 2017. The credit is 40 percent of the first $14,040 of income for a family with two qualifying children, and it is 45 percent of the first $14,040 of income for a family with three or more qualifying children. Low-income workers with no qualifying children are eligible for a 7.65-percent credit on the first $6,670 of earned income. The credit is phased out at income levels and rates which depend upon how many qualifying children are eligible and marital status. In 2017, the phase-down for married filers begins at incomes $5,590 greater than for otherwise similar unmarried filers. Earned income tax credits in excess of tax liabilities owed through the individual income tax system are refundable to individuals.

Social Security

159. ***Social Security benefits for retired and disabled workers and spouses, dependents, and survivors.***—The baseline tax system would tax Social Security benefits to the extent that contributions to Social Security were not previously taxed. Thus, the portion of Social Security benefits that is attributable to employer contributions and to earnings on employer and employee contributions (and not attributable to employee contributions which are taxed at the time of contribution) would be subject to tax. In contrast, the Tax Code may not tax all of the Social Security benefits that exceed the beneficiary's contributions from previously taxed income. Actuarially, previously taxed contributions generally do not exceed 15 percent of benefits, even for retirees receiving the highest levels of benefits. Therefore, up to 85 percent of recipients' Social Security and Railroad Social Security Equivalent retirement benefits are included in (phased into) the income tax base if the recipient's provisional income exceeds certain base amounts. (Provisional income is equal to other items included in adjusted gross income plus foreign or U.S. possession income, tax-exempt interest, and one half of Social Security and Railroad Social Security Equivalent retirement benefits.) The untaxed portion of the benefits received by taxpayers who are below the income amounts at which 85 percent of the benefits are taxable is counted as a tax expenditure. Benefits paid to disabled workers and to spouses, dependents, and survivors are treated in a similar manner. Railroad Social Security Equivalent benefits are treated like Social Security benefits. See also provision number 138, Exclusion of railroad Social Security equivalent benefits.

160. ***Credit for certain employer social security contributions.***—Under the baseline tax system, employer contributions to Social Security represent labor cost and are deductible expenses. Under current law, however, certain employers are allowed a tax credit, instead of a deduction, against taxes paid on tips received from customers in connection with the providing, delivering, or serving of food or beverages for consumption, The tip credit equals the full amount of the employer's share of FICA taxes paid on the portion of tips, when added to the employee's non-tip wages, in excess of $5.15 per hour. The credit is available only with respect to FICA taxes paid on tips.

Veterans Benefits and Services

161. ***Exclusion of veterans death benefits and disability compensation.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income because they represent accretions to wealth that do not materially differ from cash wages. In contrast, all compensation due to death or disability paid by the Veterans Administration is excluded from taxable income under current law.

162. ***Exclusion of veterans pensions.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income because they represent accretions to wealth that do not materially differ from cash wages. Under current law, however, pension payments made by the Veterans Administration are excluded from gross income.

163. ***Exclusion of G.I. Bill benefits.***—Under the baseline tax system, all compensation, including dedicated payments and in-kind benefits, should be included in taxable income because they represent accretions to wealth that do not materially differ from cash wages. Under current law, however, G.I. Bill benefits paid by the Veterans Administration are excluded from gross income.

164. ***Exclusion of interest on veterans housing bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, under current law, interest earned on general obligation bonds issued by State and local governments to finance housing for veterans is excluded from taxable income.

General Government

165. ***Exclusion of interest on public purpose State and local bonds.***—The baseline tax system generally would tax all income under the regular tax rate schedule. It would not allow preferentially low (or zero) tax rates to apply to certain types or sources of income. In contrast, under current law interest earned on State and local government bonds issued to finance public-purpose construction (e.g., schools, roads, sewers), equipment acquisition, and other public purposes is tax-exempt. Interest on bonds issued by Indian tribal governments for essential governmental purposes is also tax-exempt.

166. ***Build America Bonds.***—The baseline tax system would not allow credits for particular activities or targeted at specific group. In contrast, the Tax Code in 2009 allowed State and local governments to issue taxable bonds through 2010 and receive a direct payment from Treasury equal to 35 percent of interest expenses. Alternatively, State and local governments could issue taxable bonds and the private lenders receive the 35-percent credit which is included in taxable income.

167. ***Deductibility of nonbusiness State and local taxes other than on owner-occupied homes.***—Under the baseline tax system, a deduction for personal consumption expenditures would not be allowed. In contrast, the Tax Code allows taxpayers who itemize their deductions to claim a deduction for State and local income taxes (or, at the taxpayer's election, State and local sales taxes) and property taxes, even though these taxes primarily pay for services that, if purchased directly by taxpayers, would not be deductible. (The estimates for this tax expenditure do not include the estimates for the deductibility of State and local property tax on owner-occupied homes. See item 59.)

Interest

168. ***Deferral of interest on U.S. savings bonds.***—The baseline tax system would uniformly tax all returns to investments and not allow an exemption or deferral for particular activities, investments, or industries. In contrast, taxpayers may defer paying tax on interest earned on U.S. savings bonds until the bonds are redeemed.

APPENDIX

Performance Measures and the Economic Effects of Tax Expenditures

The Government Performance and Results Act of 1993 (GPRA) directs Federal agencies to develop annual and strategic plans for their programs and activities. These plans set out performance objectives to be achieved over a specific time period. Most of these objectives are achieved through direct expenditure programs. Tax expenditures – spending programs implemented through the tax code by reducing tax obligations for certain activities -- contribute to achieving these goals in a manner similar to direct expenditure programs.

Tax expenditures by definition work through the tax system and, particularly, the income tax. Thus, they may be relatively advantageous policy approaches when the benefit or incentive is related to income and is intended to be widely available. Because there is an existing public administrative and private compliance structure for the tax system, income-based programs that require little oversight might be efficiently run through the tax system. In addition, some tax expenditures actually simplify the operation of the tax system (for example, the exclusion for up to $500,000 of capital gains on home sales). Tax expenditures also implicitly subsidize certain activities in a manner similar to direct expenditures. For example, exempting employer-sponsored health insurance from income taxation is equivalent to a direct spending subsidy equal to the forgone tax obligations for this type of compensation. Spending, regulatory or tax-disincentive policies can also modify behavior, but may have different economic effects. Finally, a variety of tax expenditure

tools can be used, e.g., deductions; credits; exemptions; deferrals; floors; ceilings; phase-ins; phase-outs; and these can be dependent on income, expenses, or demographic characteristics (age, number of family members, etc.). This wide range of policy instruments means that tax expenditures can be flexible and can have very different economic effects.

Tax expenditures also have limitations. In many cases they add to the complexity of the tax system, which raises both administrative and compliance costs. For example, personal exemptions, deductions, credits, and phase-outs can complicate filing and decision-making. The income tax system may have little or no contact with persons who have no or very low incomes, and does not require information on certain characteristics of individuals used in some spending programs, such as wealth or duration of employment. These features may reduce the effectiveness of tax expenditures for addressing socioeconomic disparities. Tax expenditures also generally do not enable the same degree of agency discretion as an outlay program. For example, grant or direct Federal service delivery programs can prioritize activities to be addressed with specific resources in a way that is difficult to emulate with tax expenditures.

Outlay programs have advantages where the direct provision of government services is particularly warranted, such as equipping and maintaining the armed forces or administering the system of justice. Outlay programs may also be specifically designed to meet the needs of low-income families who would not otherwise be subject to income taxes or need to file a tax return. Outlay programs may also receive more year-to-year oversight and fine tuning through the legislative and executive budget process. In addition, many different types of spending programs include direct Government provision; credit programs; and payments to State and local governments, the private sector, or individuals in the form of grants or contracts provide flexibility for policy design. On the other hand, certain outlay programs may rely less directly on economic incentives and private-market provision than tax incentives, thereby reducing the relative efficiency of spending programs for some goals. Finally, spending programs, particularly on the discretionary side, may respond less rapidly to changing activity levels and economic conditions than tax expenditures.

Regulations may have more direct and immediate effects than outlay and tax-expenditure programs because regulations apply directly and immediately to the regulated party (i.e., the intended actor), generally in the private sector. Regulations can also be fine-tuned more quickly than tax expenditures because they can often be changed as needed by the Executive Branch without legislation. Like tax expenditures, regulations often rely largely on voluntary compliance, rather than detailed inspections and policing. As such, the public administrative costs tend to be modest relative to the private resource costs associated with modifying activities. Historically, regulations have tended to rely on proscriptive measures, as opposed to economic incentives. This reliance can diminish their economic efficiency, although this feature can also promote full compliance where (as in certain safety-related cases) policymakers believe that trade-offs with economic considerations are not of paramount importance. Also, regulations generally do not directly affect Federal outlays or receipts. Thus, like tax expenditures, they may escape the degree of scrutiny that outlay programs receive. Some policy objectives are achieved using multiple approaches. For example, minimum wage legislation, the earned income tax credit, and the food stamp program (SNAP) are regulatory, tax expenditure, and direct outlay programs, respectively, all having the objective of improving the economic welfare of low-wage workers and families.

A Framework for Evaluating the Effectiveness of Tax Expenditures

Across all major budgetary categories - from housing and health to space, technology, agriculture, and national defense - tax expenditures make up a significant portion of Federal activity and affect every area of the economy. For these reasons, a comprehensive evaluation framework that examines incentives, direct results, and spillover effects will benefit the budgetary process by informing decisions on tax expenditure policy.

As described above, tax expenditures, like spending and regulatory programs, have a variety of objectives and economic effects. These include: encouraging certain types of activities (e.g., saving for retirement or investing in certain sectors); increasing certain types of after-tax income (e.g., favorable tax treatment of Social Security income); and reducing private compliance costs and Government administrative costs (e.g., the exclusion for up to $500,000 of capital gains on home sales). Some of these objectives are well suited to quantitative measurement and evaluation, while others are less well suited.

Performance measurement is generally concerned with inputs, outputs, and outcomes. In the case of tax expenditures, the principal input is usually the revenue effect. Outputs are quantitative or qualitative measures of goods and services, or changes in income and investment, directly produced by these inputs. Outcomes, in turn, represent the changes in the economy, society, or environment that are the ultimate goals of programs. Evaluations assess whether programs are meeting intended goals, but may also encompass analyzing whether initiatives are superior to other policy alternatives.

The Administration is working towards examining the objectives and effects of the wide range of tax expenditures in our budget, despite challenges related to data availability, measurement, and analysis. Evaluations include an assessment of whether tax expenditures are achieving intended policy results in an efficient manner, with minimal burdens on individual taxpayers, consumers, and firms; and an examination of possible unintended effects and their consequences.

As an illustration of how evaluations can inform budgetary decisions, consider education, and research investment credits.

Education. There are millions of individuals taking advantage of tax credits designed to help pay for educational expenses. There are a number of different credits available as well as other important forms of Federal support for higher education such as subsidized loans and grants. An evaluation would explore the possible relationships between use of the credits and the use of loans and grants, seeking to answer, for example, whether the use of credits reduce or increase the likelihood of the students applying for loans. Such an evaluation would allow stakeholders to determine the most effective program – whether it is a tax credit, a subsidized loan, or a grant.

Investment. A series of tax expenditures reduce the cost of investment, both in specific activities such as research and experimentation, extractive industries, and certain financial activities and more generally throughout the economy, through accelerated depreciation for plant and equipment. These provisions can be evaluated along a number of dimensions. For example, it is useful to consider the strength of the incentives by measuring their effects on the cost of capital (the return which investments must yield to cover their costs) and effective tax rates. The impact of these provisions on the amounts of corresponding forms of investment (e.g., research spending, exploration activity, equipment) might also be estimated. In some cases, such as research, there is evidence that the investment can provide significant positive externalities—that is, economic benefits that are not reflected in the market transactions between private parties. It could be useful to quantify these externalities and compare them with the size of tax expenditures. Measures could also indicate the effects on production from these investments such as numbers or values of patents, energy production and reserves, and industrial production. Issues to be considered include the extent to which the preferences increase production (as opposed to benefiting existing output) and their cost-effectiveness relative to other policies. Analysis could also consider objectives that are more difficult to measure but still are ultimate goals, such as promoting the Nation's technological base, energy security, environmental quality, or economic growth. Such an assessment is likely to involve tax analysis as well as consideration of non-tax matters such as market structure, scientific, and other information (such as the effects of increased domestic fuel production on imports from various regions, or the effects of various energy sources on the environment).

The tax proposals subject to these analyses include items that indirectly affect the estimated value of tax expenditures (such as changes in income tax rates), proposals that make reforms to improve tax compliance and administration, as well as proposals which would change, add, or delete tax expenditures.

Barriers to Evaluation. Developing a framework that is sufficiently comprehensive, accurate, and flexible is a significant challenge. Evaluations are constrained by the availability of appropriate data and challenges in economic modeling:

- Data availability. Data may not exist, or may not exist in an analytically appropriate form, to conduct rigorous evaluations of certain types of expenditures. For example, measuring the effects of tax expenditures designed to achieve tax neutrality for individuals and firms earning income abroad, and foreign firms could require data from foreign governments or firms which are not readily available.

- Analytical constraints. Evaluations of tax expenditures face analytical constraints even when data are available. For example, individuals might have access to several tax expenditures and programs aimed at improving the same outcome. Isolating the effect of a single tax credit is challenging absent a well-specified research design.

- Resources. Tax expenditure analyses are seriously constrained by staffing considerations. Evaluations typically require expert analysts who are often engaged in other more competing areas of work related to the budget.

The Executive Branch is focused on addressing these challenges to lay the foundation for the analysis of tax expenditures comprehensively, alongside evaluations of the effectiveness of direct spending initiatives.