

FEBRUARY 6, 2015

RULES COMMITTEE PRINT 114-6
TEXT OF H.R. 636, AMERICA'S SMALL BUSINESS
TAX RELIEF ACT OF 2015

[Showing the texts of H.R. 636, H.R. 629, and H.R. 630 as ordered reported by the Committee on Ways and Means with conforming changes.]

1 **SECTION 1. SHORT TITLE.**

2 This Act may be cited as the “America’s Small Business Tax Relief Act of 2015”.

4 **SEC. 2. EXPENSING CERTAIN DEPRECIABLE BUSINESS AS-**
5 **SETS FOR SMALL BUSINESS.**

6 (a) IN GENERAL.—

7 (1) DOLLAR LIMITATION.—Section 179(b)(1) of
8 the Internal Revenue Code of 1986 is amended by
9 striking “shall not exceed—” and all that follows
10 and inserting “shall not exceed \$500,000.”.

11 (2) REDUCTION IN LIMITATION.—Section
12 179(b)(2) of such Code is amended by striking “ex-
13 ceeds—” and all that follows and inserting “exceeds
14 \$2,000,000.”.

15 (b) COMPUTER SOFTWARE.—Section
16 179(d)(1)(A)(ii) of such Code is amended by striking “,
17 to which section 167 applies, and which is placed in service

1 in a taxable year beginning after 2002 and before 2015”
2 and inserting “and to which section 167 applies”.

3 (c) ELECTION.—Section 179(c)(2) of such Code is
4 amended—

5 (1) by striking “may not be revoked” and all
6 that follows through “and before 2015”, and

7 (2) by striking “IRREVOCABLE” in the heading
8 thereof.

9 (d) AIR CONDITIONING AND HEATING UNITS.—Sec-
10 tion 179(d)(1) of such Code is amended by striking “and
11 shall not include air conditioning or heating units”.

12 (e) QUALIFIED REAL PROPERTY.—Section 179(f) of
13 such Code is amended—

14 (1) by striking “beginning after 2009 and be-
15 fore 2015” in paragraph (1), and

16 (2) by striking paragraphs (3) and (4).

17 (f) INFLATION ADJUSTMENT.—Section 179(b) of
18 such Code is amended by adding at the end the following
19 new paragraph:

20 “(6) INFLATION ADJUSTMENT.—

21 “(A) IN GENERAL.—In the case of any
22 taxable year beginning after 2015, the dollar
23 amounts in paragraphs (1) and (2) shall each
24 be increased by an amount equal to—

25 “(i) such dollar amount, multiplied by

1 “(ii) the cost-of-living adjustment de-
2 termined under section 1(f)(3) for the cal-
3 endar year in which the taxable year be-
4 gins, determined by substituting ‘calendar
5 year 2014’ for ‘calendar year 1992’ in sub-
6 paragraph (B) thereof.

7 “(B) ROUNDING.—The amount of any in-
8 crease under subparagraph (A) shall be round-
9 ed to the nearest multiple of \$10,000.”.

10 (g) EFFECTIVE DATE.—The amendments made by
11 this section shall apply to taxable years beginning after
12 December 31, 2014.

13 **SEC. 3. REDUCED RECOGNITION PERIOD FOR BUILT-IN**
14 **GAINS OF S CORPORATIONS MADE PERMA-**
15 **NENT.**

16 (a) IN GENERAL.—Paragraph (7) of section 1374(d)
17 of the Internal Revenue Code of 1986 is amended to read
18 as follows:

19 “(7) RECOGNITION PERIOD.—

20 “(A) IN GENERAL.—The term ‘recognition
21 period’ means the 5-year period beginning with
22 the 1st day of the 1st taxable year for which
23 the corporation was an S corporation. For pur-
24 poses of applying this section to any amount in-
25 cludible in income by reason of distributions to

1 shareholders pursuant to section 593(e), the
2 preceding sentence shall be applied without re-
3 gard to the phrase ‘5-year’.

4 “(B) INSTALLMENT SALES.—If an S cor-
5 poration sells an asset and reports the income
6 from the sale using the installment method
7 under section 453, the treatment of all pay-
8 ments received shall be governed by the provi-
9 sions of this paragraph applicable to the taxable
10 year in which such sale was made.”.

11 (b) EFFECTIVE DATE.—The amendment made by
12 this section shall apply to taxable years beginning after
13 December 31, 2014.

14 **SEC. 4. PERMANENT RULE REGARDING BASIS ADJUST-**
15 **MENT TO STOCK OF S CORPORATIONS MAK-**
16 **ING CHARITABLE CONTRIBUTIONS OF PROP-**
17 **ERTY.**

18 (a) IN GENERAL.—Section 1367(a)(2) of the Internal
19 Revenue Code of 1986 is amended by striking the last sen-
20 tence.

21 (b) EFFECTIVE DATE.—The amendment made by
22 this section shall apply to contributions made in taxable
23 years beginning after December 31, 2014.

1 **SEC. 5. BUDGETARY EFFECTS.**

2 The budgetary effects of this Act shall not be entered
3 on either PAYGO scorecard maintained pursuant to sec-
4 tion 4(d) of the Statutory Pay-As-You-Go Act of 2010.

