

107TH CONGRESS
1ST SESSION

H. R. 744

To amend the Internal Revenue Code of 1986 to encourage charitable contributions to public charities for use in medical research.

IN THE HOUSE OF REPRESENTATIVES

FEBRUARY 27, 2001

Ms. DUNN (for herself and Mr. CARDIN) introduced the following bill; which was referred to the Committee on Ways and Means

A BILL

To amend the Internal Revenue Code of 1986 to encourage charitable contributions to public charities for use in medical research.

1 *Be it enacted by the Senate and House of Representa-
2 tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Medical Research In-
5 vestment Act of 2001”.

6 **SEC. 2. INCREASE IN LIMITATION ON CHARITABLE DEDUC-
7 TION FOR CONTRIBUTIONS FOR MEDICAL RE-
8 SEARCH.**

9 (a) IN GENERAL.—Paragraph (1) of section 170(b)
10 of the Internal Revenue Code of 1986 (relating to percent-

1 age limitations) is amended by adding at the end the fol-
2 lowing new subparagraph:

3 “(G) SPECIAL LIMITATION WITH RESPECT
4 TO CERTAIN CONTRIBUTIONS FOR MEDICAL RE-
5 SEARCH.—

6 “(i) IN GENERAL.—Any medical re-
7 search contribution shall be allowed to the
8 extent that the aggregate of such contribu-
9 tions does not exceed the lesser of—

10 “(I) 80 percent of the taxpayer’s
11 contribution base for any taxable year,
12 or

13 “(II) the excess of 80 percent of
14 the taxpayer’s contribution base for
15 the taxable year over the amount of
16 charitable contributions allowable
17 under subparagraphs (A) and (B) (de-
18 termined without regard to subpara-
19 graph (C)).

20 “(ii) CARRYOVER.—If the aggregate
21 amount of contributions described in clause
22 (i) exceeds the limitation of such clause,
23 such excess shall be treated (in a manner
24 consistent with the rules of subsection
25 (d)(1)) as a medical research contribution

- 1 in each of the 10 succeeding taxable years
- 2 in order of time.

25 (b) CONFORMING AMENDMENTS.—

13 (A) in the matter preceding subclause (I),
14 by inserting “or a medical research contribu-
15 tion” after “applies”, and

16 (B) in the second sentence, by inserting
17 “(other than medical research contributions)”
18 before the period.

19 (c) EFFECTIVE DATE.—The amendments made by
20 this section shall apply—

21 (1) to contributions made in taxable years be-
22 ginning after December 31, 2001, and

23 (2) to contributions made on or before Decem-
24 ber 31, 2001, but only to the extent that a deduction
25 would be allowed under section 170 of the Internal

1 Revenue Code of 1986 for taxable years beginning
2 after December 31, 1999, had section 170(b)(1)(G)
3 of such Code (as added by this section) applied to
4 such contributions when made.

5 SEC. 3. TREATMENT OF CERTAIN INCENTIVE STOCK OP-
6 TIONS.

7 (a) AMT ADJUSTMENTS.—Section 56(b)(3) of the
8 Internal Revenue Code of 1986 (relating to treatment of
9 incentive stock options) is amended—

10 (1) by striking “Section 421” and inserting the
11 following:

15 (2) by adding at the end the following new sub-
16 paragraph:

11 (b) NONRECOGNITION OF CERTAIN INCENTIVE
12 STOCK OPTIONS.—Section 422(c) of the Internal Revenue
13 Code of 1986 (relating to special rules) is amended by
14 adding at the end the following new paragraph:

15 “(8) MEDICAL RESEARCH CONTRIBUTIONS.—
16 For purposes of this section and section 421, the
17 transfer of a share of stock which is a medical re-
18 search stock transfer (as defined in section
19 56(b)(3)(B)) shall be treated as meeting the require-
20 ments of subsection (a)(1).”.

21 (c) EFFECTIVE DATE.—The amendments made by
22 this section shall apply to transfers of stock made after
23 the date of the enactment of this Act.

