JOINT COMMITTEE ON TAXATION April 1, 2014 JCX-27-14

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

Fiscal Years 2014 - 2024

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
visions Expiring in 2013														
Individual Tax Extenders														
Above-the-line deduction of up to \$250 for teacher														
classroom expenses (sunset 12/31/15)	tyba 12/31/13	-11	-246	-173									-430	-430
Discharge of indebtedness on principal residence excluded														
from gross income of individuals (sunset 12/31/15)	doioa 12/31/13	-471	-3,012	-1,929									-5,413	-5,413
Parity for exclusion for employer-provided mass transit														
and parking benefits (sunset 12/31/15) [1]	ma 12/31/13	-44	-105	-30									-180	-180
Premiums for mortgage insurance deductible as interest														
that is qualified residence interest (sunset 12/31/15)	apoaa 12/31/13	-138	-922	-794									-1,854	-1,854
Deduction for State and local general sales taxes (sunset														
12/31/15)	tyba 12/31/13	[2]	-3,382	-2,872	-240								-6,494	-6,494
Above-the-line deduction for qualified tuition and related														
expenses (sunset 12/31/15)	tyba 12/31/13	-15	-344	-237									-596	-596
Tax-free distributions from IRAs to certain public charities														
for individuals age 70-1/2 or older, not to exceed \$100,000														
per taxpayer per year (sunset 12/31/15)	dmi tyba 12/31/13	-248	-633	-411	-50	-55	-57	-60	-63	-66	-68	-70	-1,453	-1,779
Business Tax Extenders														
Research credit (sunset 12/31/15)	apoia 12/31/13	-2,171	-3,911	-2,341	-1,226	-1,079	-949	-838	-763	-726	-703	-664	-11,677	-15,371
Temporary minimum LIHTC rate for non-Federally														
subsidized new buildings (9%) (sunset 12/31/15)	ama 12/31/13		-1	-1	-1	[2]	[2]	[2]	[2]				-4	-4
Military housing allowance exclusion for determining area														
median gross income (sunset 12/31/15)	da 12/31/13	-1	-4	-5	-5	-5	-5	-5	-5	-5	-5	-4	-25	-49
Indian employment tax credit (sunset 12/31/15)	tyba 12/31/13	-21	-51	-39	-11	-1							-124	-124
New markets tax credit (sunset 12/31/15)	cyba 12/31/13	-2	-5	-27	-90	-171	-221	-252	-279	-288	-267	-234	-514	-1,835
Railroad track maintenance credit (sunset 12/31/15)	epoii tyba 12/31/13	-72	-207	-135	[2]								-414	-414
Mine rescue team training credit (sunset 12/31/15)	tyba 12/31/13	-1	-2	-1	-1	[2]	[2]	[2]					-3	-5
Employer wage credit for activated military reservists														
(sunset 12/31/15)	pma 12/31/13	[2]	-1	-1									-1	-1
Work opportunity tax credit (sunset 12/31/15)	wpoifibwa 12/31/13	-399	-1,012	-852	-337	-150	-74	-28	-4				-2,825	-2,857
Qualified zone academy bonds (sunset 12/31/15)	oia 12/31/13	[2]	-3	-10	-21	-30	-34	-33	-32	-30	-29	-28	-98	-251
Classification of certain race horses as 3-year property														
(sunset 12/31/15)	ppisa 12/31/13	-24	-73	-71	-13	26	39	43	38	22	6		-117	-9
	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sumset 12/31/15)	isions Expiring in 2013 Individual Tax Extenders Above-the-line deduction of up to \$250 for teacher classroom expenses (sumset 12/31/15)	bisions Expiring in 2013 Individual Tax tyba 12/31/13 -11 -246 -173	Sistors Expiring in 2013 Individual Ta: Extenders Above-the-line deduction of up to \$250 for teacher classcome expenses (sumset 1231/15)

[Millions of Dollars]

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
12. 15-year straight-line cost recovery for qualified leasehold														
improvements, qualified restaurant buildings and														
improvements, and qualified retail improvements (sunset				100		- 10		100	10.1	100	18.6	10.6	a (a)	4025
12/31/15) [3]	ppisa 12/31/13	-67	-273	-483	-551	-542	-522	-498	-494	-492	-476	-426	-2,438	-4,825
 Accelerated depreciation for business property on an Indian reservation (sunset 12/31/15) 	ppisa 12/31/13	-56	-155	-138	-32	31	65	73	49	17	-4	-8	-285	-158
14. Bonus depreciation:	pp18a 12/31/13	-50	-155	-156	-52	51	05	75	49	17	-4	-0	-285	-156
a. Additional first-year depreciation for 50% of basis	ppisa													
of qualified property (sunset 12/31/15) [4]		-8,126	-73,611	1,958	28,047	18,113	13,159	8,823	4,851	2,353	1,012	568	-20,459	-2,852
b. Election to accelerate AMT credit in lieu of bonus	ppisa													
depreciation (sunset 12/31/15)	12/31/13 ityeasd	-121	-265	-171	-34	-2	-3	-3	-2	-1	[2]	[2]	-596	-602
15. Enhanced charitable deduction for contributions of food														
inventory (sunset 12/31/15)	cma 12/31/13	-57	-145	-89									-292	-292
16. Increased expensing limitations and treatment of														
certain real property as section 179 property (sunset	t-1- 10/21/12	7.010	10 004	1.000	C 200	1007	2.052	2 000	1 102	E 47	200	1.57	7 150	2 002
12/31/15)	tyba 12/31/13	-7,019	-12,294	-1,263	6,398	4,067	2,952	2,008	1,103	547	260	157	-7,158	-3,083
17. Election to expense mine safety equipment (sunset 12/31/15)	ppisa 12/31/13	-12	-16	1	8	5	4	4	3	2	[5]		-9	
 Beduction allowable with respect to income attributable 	ppisa 12/31/13	-12	-10	1	0	5	4	4	5	2	[5]		-9	
to domestic production activities in Puerto Rico (sunset														
12/31/15)	tyba 12/31/13	-36	-110	-76									-222	-222
19. Modify tax treatment of certain payments under existing	5													
arrangements to controlling exempt organizations (sunset														
12/31/15)	proaa 12/31/13	-14	-18	-4									-36	-36
20. Treatment of certain dividends of RICs (sunset 12/31/15)	[6]	-68	-100	-30									-198	-198
21. Treatment of RICs as "qualified investment entities"														
under section 897 (FIRPTA) (sunset 12/31/15)	1/1/14	-31	-47	-15									-93	-93
22. Exception under subpart F for active financing income $(12/21/15)$	(1 10/21/12	0.000	5166	2 175									10 272	10 272
(sunset 12/31/15)	tyba 12/31/13	-2,033	-5,166	-3,175									-10,373	-10,373
23. Special rules applicable to qualified small business stock (sunset 12/31/15)	saa 12/31/13	2	15	18			-134	-924	-925				-99	-1,948
24. Basis adjustment to stock of S corporations making	saa 12/31/13	2	15	10			-134	-724	-923				-77	-1,940
charitable contributions of property (sunset 12/31/15)	cmi tyba 12/31/13	-16	-58	-28	-2	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-104	-104
25. Reduction in S corporation recognition period for		10	20		-	[-]	L=1	[-]	L=1	[-]	r=1	[-]	101	
built-in gains tax (sunset 12/31/15)	tyba 12/31/13	-15	-138	-59	-6	-5	-3	-2	-1	-1	-1	-1	-226	-232
26. Increase in limit on cover over of rum excise tax revenues	-													
(from \$10.50 to \$13.25 per proof gallon) to Puerto Rico														
and the Virgin Islands (sunset 12/31/15) [7] [8]	abiUSa 12/31/13	-142	-168	-26									-336	-336
27. Economic development credit for American Samoa														
(sunset 12/31/15)	tyba 12/31/13	-10	-15	-5									-29	-29
C. Energy Tax Extenders	. 1 10/01/10 0													
1. Alternative fuel refueling property ((including extension for hydrogen grouperty) (sugget 12/21/15)	tyba 12/31/13 &	22	40	10	2	2	1	[5]	1	1	1	1	02	00
hydrogen property) (sunset 12/31/15)	tyba 12/31/14 vaa 12/31/13	-23	-42 -2	-19 -1	-3	-2	-1	[5]	1	1	1	1	-92 -2	-89 -2
2. Credit for electric motorcycles (sunset 12/31/15)	vaa 12/31/13	[2]	-2	-1									-2	-2

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Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
3. Second generation biofuel producer credit (sunset														
12/31/15)	fsoua 12/31/13	-15	-28	-12									-55	-55
4. Incentives for biodiesel and renewable diesel:														
a. Income tax credits for biodiesel fuel, biodiesel														
used to produce a qualified mixture, and small														
agri-biodiesel producers (sunset 12/31/15)	fsoua 12/31/13	-945	-1,276	-344									-2,565	-2,565
b. Income tax credits for renewable diesel fuel and														
renewable diesel used to produce a qualified														
mixture (sunset 12/31/15)	fsoua 12/31/13					,	Estimate In	cluded In I	tem I.C.4.a	1				
c. Excise tax credits and outlay payments for														
biodiesel fuel mixtures (sunset 12/31/15)	fsoua 12/31/13 -						Estimate In	cluded In I	tem I.C.4.a	1				
d. Excise tax credits and outlay payments for														
renewable diesel fuel mixtures (sunset 12/31/15)	fsoua 12/31/13 -					,	Estimate In	cluded In I	tem I.C.4.a	1				
5. Modified credit for production of Indian coal (sunset														
12/31/15)	cpa 12/31/13	-18	-31	-15	-4	-3	-2	-1	[1]				-75	-76
6. Credit for construction of energy-efficient new homes														
(sunset 12/31/15)	haa 12/31/13	-95	-192	-114	-55	-49	-42	-36	-23	-6			-547	-612
7. Special depreciation allowance for second generation	10/01/10													
biofuel plant property (sunset 12/31/15)	ppisa 12/31/13	-1	-3	-2	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	-4	-1
8. Excise tax credits and outlay payments for alternative														
fuel, and excise tax credits for alternative fuel mixtures														
(including extensions for liquefied hydrogen) (sunset	fsoua 12/31/13 &		150	100										
12/31/15)	fsoua 9/30/14	-327	-453	-122									-903	-903
Total of Provisions Expiring in 2013		-22,863	-108,505	-14,144	31,772	20,148	14,172	8,270	3,454	1,327	-274	-709	-79,419	-67,352
II. Provisions Expiring in 2014														
A. Energy Tax Extenders														
1. Alternative motor vehicle credit for qualified fuel														
cell motor vehicles (sunset 12/31/15)	tyba 12/31/14		-30	-16									-47	-47
B. Extenders Relating to Multiemployer Defined Benefit														
Pension Plans														
1. Multiemployer defined benefit plans (sunset 12/31/15)	pyba & asa 12/31/14						Prese	ently Unava	uilable					
Total of Provisions Expiring in 2014			-30	-16									-47	-47
NET TOTAL		-22,863	-108,535	-14,160	31,772	20,148	14,172	8,270	3,454	1,327	-274	-709	-79,466	-67,399
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Joint Committee on Taxation														

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

Legend and Footnotes for JCX-27-14:

Legend for "Effective" column:																
abiUSa = articles brought into the United States after	da = determinations after								oia = obligations issued after							
ama = allocations made after	Da = disposi		pma = payments made after													
apoaa = amounts paid or accrued after	dmi = distrib			ppisa = property placed in service after												
apoia = amounts paid or incurred after	doioa = disc	debtedness	after		proaa = payments received or accrued after											
asa = applications submitted after	epoii = expe	nses paid o	or incurred			pyba = plan years beginning after										
cma = contributions made after	fsoua = fuel	ed after			saa = stock acquired after											
cmi = contributions made in	haa = homes			tyba = taxable years beginning after												
cpa = coal produced after	ityeasd = in	late			wpoifibwa = wages paid or incurred for individuals											
cyba = calendar years beginning after	ma = month	is after	-				beginning work after									
[1] Estimate includes the following effects:	<u>2014</u>	2015	2016	2017	2018	<u>2019</u>	2020	2021	2022	2023	2024	2014-19	2014-24			
General Fund	30	-70	-20									-120	-120			
OASDI	15	-35	-10									-60	-60			
[2] Loss of less than \$500,000.																
[3] Estimate includes interaction with section 179 and bonus depreciation.																
[4] Estimate includes interaction with section 179.																
[5] Gain of less than \$500,000.																
[6] Effective for dividends with respect to taxable years of regulated investment companie	es beginning a	fter Decen	nber 31, 20	13.												
[7] Estimate includes the following outlay effects:	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24			
Increase in limit on cover over of rum excise tax revenues to Puerto Rico																
and the Virgin Islands [8]	. 142	168	26									336	336			
[8] Estimate provided by the Congressional Budget Office																

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