# JOINT COMMITTEE ON TAXATION November 4, 2021 JCX-45-21

# ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS OF TITLE XIII - COMMITTEE ON WAYS AND MEANS, OF H.R. 5376, THE "BUILD BACK BETTER ACT," AS REPORTED BY THE COMMITTEE ON THE BUDGET, WITH MODIFICATIONS (RULES COMMITTEE PRINT 117-18)

## Fiscal Years 2022 - 2031

[Millions of Dollars]

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE E - INFRASTRUCTURE FINANCING AND													
COMMUNITY DEVELOPMENT													
Part 1 - Low Income Housing Credit													
Increases in State allocations	cyba 12/31/21	-3	-20	-73	-252	-345	-359	-326	-264	-228	-213	-693	-2,083
<ol> <li>Tax-exempt bond financing requirement (sunset 12/31/26).</li> <li>Buildings designed to serve extremely low-income</li> </ol>	[1]	-57	-200	-424	-736	-1,010	-1,062	-1,226	-1,291	-1,305	-1,307	-2,426	-8,617
households	[2]	-7	-31	-75	-130	-183	-227	-275	-319	-362	-416	-426	-2,025
4. Repeal of qualified contract option	DOE	2	7	16	27	38	49	60	72	84	101	91	457
5. Modification and clarification of rights relating to													
building purchase	[3]	2	8	18	32	45	59	74	88	103	124	105	553
Total of Part 1 - Low Income Housing Credit		-63	-236	-538	-1,058	-1,454	-1,540	-1,693	-1,715	-1,708	-1,712	-3,349	-11,716
Part 2 - Neighborhood Homes Investment Act	tyba 12/31/21	-192	-481	-1061	-1170	-1177	-1086	-494	-198			-4,082	-5,859
Part 3 - Investments in Tribal Infrastructure													
1. Treatment of Indian Tribes as States with respect to													
bond issuance	oii cyba DOE	[4]	-1	-3	-4	-6	-8	-10	-12	-15	-17	-14	-77
New markets tax credit for Tribal Statistical Areas      Inclusion of Indian areas as difficult development	cya 12/31/21		[4]	-2	-6	-13	-21	-29	-34	-37	-36	-22	-178
areas for purposes of certain buildings	bpisa 12/31/21	[4]	-2	-4	-8	-11	-13	-16	-18	-21	-24	-25	-117
Total of Part 3 - Investments in Tribal Infrastructure		[4]	-3	-9	-18	-30	-42	-55	-64	-73	-77	-61	-372
Part 4 - Other Provisions													
Possessions economic activity credit	[5]	-406	-853	-938	-1,017	-1,091	-1,169	-1,229	-1,270	-1,312	-1,356	-4,305	-10,641
2. Tax treatment of certain assistance to farmers, etc	[6] -				Estimate	e to be Pro	vided by the	. Congress	ional Budge	et Office			
3. Exclusion of amounts received from State-based							•	Ü					
catastrophe loss mitigation programs	tyba 12/31/20	-8	-10	-10	-11	-12	-13	-14	-15	-16	-17	-52	-126
Total of Part 4 - Other Provisions		-414	-863	-948	-1,028	-1,103	-1,182	-1,243	-1,285	-1,328	-1,373	-4,357	-10,767
TOTAL OF SUBTITLE E - INFRASTRUCTURE FINANCING A	ND												
COMMUNITY DEVELOPMENT		-668	-1,583	-2,556	-3,274	-3,764	-3,850	-3,485	-3,262	-3,109	-3,162	-11,848	-28,715

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE F - GREEN ENERGY													
THE "GROWING RENEWABLE ENERGY AND EFFICIENCY													
NOW (GREEN') ACT OF 2021"													
Part 1 - Renewable Electricity and Reducing Carbon Emissions													
1. Extension and modification of credit for electricity	6 : 10/01/01 6												
produced from certain renewable resources (sunset 12/31/26) [7]	fpisa 12/31/21 & ftcowba 12/31/21	-331	-1,087	-1.983	-3.014	-4,380	-5,846	-7,489	-9,306	-10,470	-10,981	-10,795	-54,887
2. Extension and modification of energy credit (sunset	generally	-331	-1,00/	-1,963	-3,014	-4,360	-3,640	-/,409	-9,300	-10,470	-10,981	-10,793	-34,007
12/31/26) [7]	ppisa 12/31/21	-769	-1,380	-1.565	-2,655	-5,946	-7,557	-7,587	-7,795	-8.194	-8,633	-12,315	-52,081
3. Increase in energy credit for solar facilities placed in service	1.1	, 0,	1,500	1,000	2,000	5,5 .0	,,00,	7,007	,,,,,	0,12.	0,000	12,515	52,001
in connection with low-income communities (sunset													
12/31/26)	1/1/22					Estimate	e Included i	in Item F.1.	.2. Above-				
4. Elective payment for energy property and electricity													
produced from certain renewable resources, etc	tyba 12/31/21 -				Estin	ate Include	ed in Items	F.1.1. thro	ugh F.1.3. 2	4bove			
5. Investment credit for electric transmission property	ppisa 12/31/21 &												
(sunset 12/31/31) [7]	ptcowba 12/31/21				-788	-1,213	-1,213	-1,213	-2,001	-2,426	-2,425	-2,001	-11,279
6. Extension and modification of credit for carbon oxide													
sequestration (sunset 12/31/31)		-26	-103	-276	-426	-450	-222	-141	-161	-162	-160	-1,281	-2,128
7. Green energy publicly traded partnerships	tyba 12/31/21	-148	-126	-137	-144	-99	-50	-56	-64	-72	-80	-654	-975
8. Zero-emission nuclear power production credit	epasa 12/31/21	4.202	2 000	2 2 5 2	2.524	2.710	2.020	1 255				15.550	22.055
(sunset 12/31/27) [7]	itybasd	-4,383	-2,909	-3,253	-3,524	-3,710	-3,838	-1,357				-17,779	-22,975
Total of Part 1 - Renewable Electricity and Reducing Carbon En	nissions	-5,657	-5,605	-7,214	-10,551	-15,798	-18,726	-17,843	-19,327	-21,324	-22,279	-44,825	-144,324
Part 2 - Renewable Fuels													
1. Extension of incentives for biodiesel, renewable diesel													
and alternative fuels (sunset 12/31/26)	fsoua 12/31/21	-149	-2,688	-3,721	-3,802	-3,816	-1,028					-14,177	-15,205
2. Extension of second generation biofuel incentives													
(sunset 12/31/26)	qsgbpa 12/31/21	-10	-19	-20	-22	-24	-11					-95	-106
3. Sustainable aviation fuel credit (sunset 12/31/26)	fsoua 12/31/22		-7	-16	-24	-29	-13					-76	-90
4. Credit for production of clean hydrogen [7]	[8]	-70	-195	-347	-550	-785	-1,027	-1,283	-1,565	-1,681	-1,690	-1,947	-9,193
Total of Part 2 - Renewable Fuels		-229	-2,909	-4,104	-4,398	-4,654	-2,079	-1,283	-1,565	-1,681	-1,690	-16,295	-24,594
Part 3 - Green Energy and Efficiency Incentives for Individuals													
1. Extension, increase, and modifications of	generally												
nonbusiness energy property credit (sunset	ppisa 12/31/21 &												
12/31/25)	apoia 12/31/21	-274	-1,782	-1,511	-1,484	-1,508	-1,487	-1,432	-1,458	-1,473	-1,488	-6,560	-13,898
2. Extension and modification of residential energy efficient													
property credit (sunset 12/31/31)	ema DOE	-46	-514	-1,216	-3,012	-3,098	-3,188	-3,283	-3,378	-3,459	-3,563	-7,886	-24,756
3. Energy efficient commercial buildings deduction	tyba 12/31/21 &	4.0										• • •	
(sunset 12/31/31)	ppisa 12/31/21 ityeasd	-18	-72	-70	-68	-67	-66	-65	-66	-67	-69	-295	-626
4. Extension, increase, and modifications of new	1 12/21/21	122	222	250	271	200	207	221	220	205	200	1 102	0.704
energy efficient home credit (sunset 12/31/31)	duaa 12/31/21	-132	-233	-258	-271	-289	-307	-321	-320	-305	-289	-1,182	-2,724
5. Modifications to income exclusion for conservation	ana 12/21/10	-6	-2	-2	-3	-4	-5			-7	-7	-17	40
subsidies	ara 12/31/18	-0	-2	-2	-3	-4	-3	-6	-6	-/	-/	-1 /	-48

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
6. Credit for qualified wildfire mitigation expenditures	epoia DOE ityeasd	-12	-28	-31	-36	-42	-44	-46	-48	-49	-50	-149	-387
Total of Part 3 - Green Energy and Efficiency Incentives for Indi	viduals	-488	-2,631	-3,088	-4,874	-5,008	-5,097	-5,153	-5,276	-5,360	-5,466	-16,089	-42,439
Part 4 - Greening the Fleet and Alternative Vehicles													
1. Refundable new qualified plug-in electric drive motor	vaa 12/31/21 &												
vehicle credit for individuals (sunset 12/31/31) [7]	vaa 12/31/22	-96	-494	-576	-709	-832	-1,001	-1,171	-1,304	-1,447	-1,559	-2,709	-9,192
motor vehicles (sunset 12/31/31)	vaa 12/31/21	-33	-104	-119	-150	-166	-183	-202	-224	-247	-269	-572	-1,696
3. Qualified commercial electric vehicles (sunset 12/31/31)	vaa 12/31/21	-79	-171	-235	-303	-396	-516	-624	-717	-808	-914	-1,184	-4,762
<ul><li>4. Qualified fuel cell motor vehicles (sunset 12/31/31)</li><li>5. Alternative fuel refueling property credit (sunset</li></ul>	ppisa 12/31/21	-4	-7	-8	-9	-11	-4					-40	-44
12/31/31)	ppisa 12/31/21	-93	-404	-461	-523	-591	-666	-749	-837	-932	-1,027	-2,072	-6,283
6. Reinstatement and expansion of employer-provided fringe	ppisa 12/31/21	,,,	101	101	323	371	000	, 1,	057	752	1,027	2,072	0,203
benefits for bicycle commuting [9]	tyba 12/31/21	-20	-21	-23	-13	-16	-16	-18	-18	-19	-19	-93	-183
7. Credit for certain new electric bicycles (sunset 12/31/25)		-254	-683	-889	-1,157	-1,126	-8	-7	-6	-6	-4	-4,108	-4,139
7. Credit for certain new electric oregeres (sunset 12/31/23)	ppisa 12/21/21 hyeasa	251	003	007	1,137	1,120	0	,	Ü	O	•	1,100	1,137
Total of Part 4 - Greening the Fleet and Alternative Vehicles		-579	-1,884	-2,311	-2,864	-3,138	-2,394	-2,771	-3,106	-3,459	-3,792	-10,778	-26,299
Part 5 - Investment in the Green Workforce													
1. Extension of the advanced energy project credit [7][10]	1/1/22	-1,476	-2,053	-1,184	-787	-796	-528	-380	-240	-169	-36	-6,296	-7,649
2. Labor costs of installing mechanical insulation property													
(sunset 12/31/25)	apoia 12/31/21 ityeasd	-371	-745	-939	-1,099	-813	-532	-480	-428	-326	-207	-3,967	-5,940
3. Advanced manufacturing investment credit													
(sunset 12/31/25) [7]	[11]	-1,501	-2,706	-2,931	-2,842	-913	115	130	145	151	157	-10,895	-10,197
4. Advanced manufacturing production credit													
(sunset 12/31/29) [7]	cpasa 12/31/21	-214	-336	-348	-372	-401	-353	-256	-151	-40		-1,672	-2,472
Total of Part 5 - Investment in the Green Workforce		-3,562	-5,840	-5,402	-5,100	-2,923	-1,298	-986	-674	-384	-86	-22,830	-26,258
Part 6 - Qualified Environmental Justice Credit (sunset													
12/31/31) [7][10]	1/1/22		-400	-700	-800	-900	-1,000	-1,000	-1,000	-1,000	-1,000	-2,800	-7,800
Part 7 - Reinstatement of Superfund	7/1/22	622	2,116	2,406	2,506	2,601	2,698	2,800	2,906	3,017	3,132	10,251	24,804
De 40 Leave and a Charles Electrical Charles Transport													
Part 8 - Incentives for Clean Electricity and Clean Transportatio								10	510	1.070	2.550		C 002
1. Clean electricity production credit [7]	[12]							-19	-546	-1,878	-3,558		-6,002
2. Clean electricity investment credit [7]	[12]						-723	-1,082	-8,774	-13,127	-13,519		-37,225
3. Increase in clean electricity investment credit for facilities													
placed in service in connection with low-income	1/1/07					E .:			2 41				
communities	1/1/27					- Estimate	ncluded i	n Item F.8.	2. Above -				
4. Cost recovery for qualified facilities, qualified property, and	C : 10/21/26						26	00	107	1.71	211		<i>.</i>
grid improvement property	fappisa 12/31/26						-26	-83	-134	-171	-211		-624
5. Clean fuel production credit [7]	tfpa 12/31/26						-1,499	-2,104	-2,204	-2,320	-1,590		-9,716
Total of Part 8 - Incentives for Clean Electricity and Clean Trans	portation						-2,248	-3,288	-11,659	-17,496	-18,878		-53,567
TOTAL OF SUBTITLE F - GREEN ENERGY		-9,893	-17,154	-20,414	-26,081	-29,820	-30,143	-29,523	-39,701	-47,687	-50,059	-103,367	-300,477

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE G - SOCIAL SAFETY NET Part 1 - Child Tax Credit: Extend and modify ARP modifications to CTC, income lookback for phase out, expanded safe harbor, fully advanced credit with MAGI limit, no child SSN requirement (sunset 12/31/22); no child SSN requirement, full refundability of CTC (not the \$500 credit) (taxable years beginning after 12/31/22) [7]	tyba 12/31/21	-101,390	-28,936	-12,236	-11,714	-12,669	-3,604	-3,527	-3,503	-3,515	-3,551	-166,945	-184,646
Part 2 - Earned Income Tax Credit													
Certain improvements to the earned income tax credit extended through 2022 [7]	tyba 12/31/21	-578	-12,693									-13,271	-13,271
Funds for administration of earned income tax credits in the territories [7]	pmf cyba 12/31/21		-5	-5	-5	-5	-5	-5	-5	-5	-5	-20	-45
	1 ,	 											
Total of Part 2 - Earned Income Tax Credit		-578	-12,698	-5	-5	-5	-5	-5	-5	-5	-5	-13,291	-13,316
Part 3 - Expanding Access to Health Coverage and Lowering Costs													
Improve affordability and reduce premium costs of health insurance for consumers (sunset 12/31/25)      Matigation of supplementary and supplementary of supplementary and supplement	tyba 12/31/21				Estimate	e to be Prov	rided by the	: Congressi	onal Budge	et Office			
Modification of employer sponsored coverage affordability test in health insurance premium tax credit (sunset 12/31/25)	tyba 12/31/21				Estimate	e to be Prov	rided by the	: Congressi	onal Budge	et Office			
Treatment of lump-sum Social Security benefits in determining household income	tyba 12/31/21				Estimate	e to be Prov	ided by the	: Congressi	onal Budge	et Office			
Temporary expansion of health insurance premium tax credits for certain low-income populations (sunset 12/31/25) [13]	tyba 12/31/21				Estimate	e to be Prov	rided by the	: Congressi	onal Budge	et Office			
5. Special rule for individuals receiving unemployment													
compensation (sunset 12/31/22)	tyba 12/31/21					e to be Prov	-	_	_				
Permanent credit for health insurance costs [7]      Exclusion of certain dependent income for purposes of	cmba 12/31/21	-8	-18	-19	-20	-31	-44	-47	-49	-52	-56	-96	-344
premium tax credit (sunset 12/31/26)	tyba 12/31/22				Estimati	e to he Prov	ided by the	Conoressi	onal Rudoe	et Office			
8. Requirements with respect to cost-sharing for certain insulin	ty 04 12/31/22				Liman	0 10 00 1 101	idea by inc	congressi	onai Buage	i Ojjiee			
products	pybo/a 1/1/23				Estimate	e to be Prov	ided by the	. Congressi	onal Budge	et Office			
9. Oversight of pharmacy benefit manager services	pybo/a 1/1/23				Estimate	e to be Prov	rided by the	. Congressi	onal Budge	et Office			
Total of Part 3 - Expanding Access to Health Coverage and Lowering Costs		-8	-18	-19	-20	-31	-44	-47	-49	-52	-56	-96	-344
Part 4 - Pathway to Practice Training Programs - Establishing rural and underserved pathway to practice training													
programs for post-baccalaureate students, medical students, and medical residents [7]	tyba DOE			-74	-165	-262	-387	-589	-844	-1,136	-1,420	-500	-4,877

Part 5 - Higher Education												2022-26	2022-31
Credit for public university research infrastructure	. qccma 12/31/21	-33	-37	-36	-36	-26	-9					-168	-177
2. Treatment of Federal Pell Grants for income tax purposes													
(sunset 12/31/25) [7]	. tyba 12/31/21	-6	-229	-225	-215	-205						-880	-880
3. Repeal of denial of American Opportunity Tax Credit on													
basis of felony drug conviction [7]	tyba 12/31/21	-3	-21	-21	-20	-20	-20	-20	-19	-18	-18	-85	-180
Total of Part 5- Higher Education		-42	-287	-282	-271	-251	-29	-20	-19	-18	-18	-1,133	-1,237
Part 6 - Limit Itemized Deductions for State and Local Taxes to													
\$72,500 (sunset 12/31/31)	. tyba 12/31/20	-50,627	-50,314	-52,431	-54,597	-14,002	45,966	42,028	43,592	45,265	47,159	-221,972	2,037
OTAL OF SUBTITLE G - SOCIAL SAFETY NET		-152,645	-92,253	-65,047	-66,772	-27,220	41,897	37,840	39,172	40,539	42,109	-403,937	-202,383
UBTITLE H - RESPONSIBLY FUNDING OUR PRIORITIES													
Part 1 - Corporate and International Tax Reforms													
A. Corporate Provisions													
Corporate alternative minimum tax	tyba 12/31/22	4,481	55,753	49,165	32,588	24,695	22,747	25,789	30,535	34,969	38,189	166,682	318,911
Excise tax on repurchase of corporate stock	rosa 12/31/21	8,212	11,782	12,011	12,343	13,149	13,632	13,569	13,208	13,051	13,267	57,497	124,226
B. Limitations on Deduction for Interest Expense	. tyba 12/31/22		1,520	3,123	3,285	3,254	3,173	3,279	3,398	3,435	3,430	11,182	27,896
C. Outbound International Provisions	·												
1. Modifications to deduction for foreign-derived													
intangible income and global intangible low-taxed income.	[14]		12,597	26,422	28,687	20,624	11,481	11,432	11,109	11,000	10,926	88,330	144,278
2. Repeal of election for 1-month deferral in determination			ŕ	ŕ		ŕ	,	ŕ		ŕ	ŕ	,	ŕ
of taxable year of specified foreign corporations	tyosfcba 11/30/22		3,353	3,353	[15]							6,706	6,706
3. Modifications of foreign tax credit rules applicable to certa:	•												
taxpayers receiving specific economic benefits	apoaa 12/31/21	217	438	469	619	802	769	903	941	772	791	2,545	6,721
4. Modifications to foreign tax credit limitations	•	-18	698	1,621	2,010	2,006	1,597	1,207	966	850	1,064	6,317	12,000
5. Foreign oil and gas extraction income and foreign oil				ŕ		ŕ	,	ŕ			ŕ	,	ŕ
related income to include oil shale and tar sands	tyba 12/31/21					- Estimate	Included in	n Item H.1.	C.6. Below				
6. Modifications to inclusion of global intangible	Ž												
low-taxed income	[17]	150	1,273	4,102	6,175	5,997	5,896	6,837	8,022	8,838	9,691	17,697	56,980
7. Modifications to determination of deemed paid credit	L · J		,	, -	-,	- /	- ,	-,	- / -	-,	- ,	.,	/
for taxes properly attributable to tested income	[18]		-1,514	-3,155	-3,250	-3,057	-3,022	-3,194	-3,350	-3,397	-3,255	-10,976	-27,194
8. Deduction for foreign source portion of dividends limited to			-,	-,	-,	-,,	-,	-,	-,	-,	-,	,	,
controlled foreign corporations, etc		21	42	44	45	46	48	49	51	52	54	198	451
Limitation on foreign base company sales and	[17]	2.1		• • • • • • • • • • • • • • • • • • • •	15	10	10	.,	51	32	51	170	131
services income	. [20]	9	814	1,754	1,913	1,534	1,144	1,162	1,190	1,232	1,287	6,025	12,041
D. Inbound International Provisions	. [20]		011	1,731	1,713	1,551	1,111	1,102	1,170	1,232	1,207	0,023	12,011
Modifications to base erosion and anti-abuse tax	tyba 12/31/21	-1,633	-2,531	1,529	7,233	9,260	9,412	10,191	10,578	11,144	11,904	13,858	67,088
E. Other Business Tax Provisions	1,04 12/31/21	1,055	2,331	1,527	,,233	7,200	>,112	10,171	10,570	11,177	11,707	13,030	07,000
Credit for clinical testing of orphan drugs limited to first													
use or indication	tyba 12/31/21	88	186	208	234	260	286	314	346	380	418	975	2,720
Modifications to treatment of certain	lai tyba 12/31/21 &	00	100	200	234	200	200	217	570	300	710	713	2,720
	· ·	25	165	172	179	186	193	201	209	217	226	726	1,773
losses  3. Adjusted basis limitation for divisive reorganization		689	1,294	1,769	1,917	1,944	1,975	2,006	2,037	2,069	2,103	7,613	17,803

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
4. Rents from prison facilities not treated as qualified													
income for purposes of REIT income tests	tyba 12/31/21	5	9	10	10	6	3	3	3	3	3	40	55
5. Modifications to exemption for portfolio interest	oia DOE	576	876	405	118	25	20	16	13	10	8	2,000	2,067
6. Certain partnership interest derivatives	pma 12/31/22	4	9	9	9	9	10	10	10	10	10	41	90
7. Adjustments to earnings and profits of controlled													
foreign corporations	[21]	150	325	375	425	475	525	575	625	675	725	1,750	4,875
8. Certain dividends from controlled foreign corporations to													
United States shareholders treated as extraordinary													
dividends	[22]					Estimate	Included i	n Item H.1.	C.4. Above				
9. Limitation on certain special rules for section 1202	generally												
gains	saeoa 9/13/21	69	470	517	572	639	698	705	710	677	661	2,267	5,718
10. Constructive sales	generally csa DOE -						Included in	n Item H.1.	E.12. Below				
11. Rules relating to common control	tyba 12/31/21	628	1,267	1,276	1,313	1,434	1,601	1,788	2,011	2,248	2,457	5,919	16,023
12. Modification of wash sale rules	sdata 12/31/21	3,226	4,946	2,725	1,626	1,074	804	653	587	562	559	13,597	16,762
13. Research and experimental expenditures													
(sunset 12/31/25)	DOE	-29,091	-39,856	-32,161	-24,133	19,284	38,009	29,958	19,853	9,269	4,851	-105,956	-4,016
Total of Part 1 - Corporate and International Tax Reforms	······································	-12,192	53,916	75,743	73,918	103,646	111,001	107,453	103,052	98,066	99,369	295,033	813,974
Part 2 - Tax Increases for High-Income Individuals													
1. Application of net investment income tax to trade or													
business income of certain high income individuals	tyba 12/31/21	12,742	19,543	21,734	24,050	25,861	27,966	28,997	29,675	30,439	31,156	103,930	252,163
2. Limitations on excess business losses of noncorporate													
taxpayers made permanent, with carryforward													
modification	tyba 12/31/20	3,127	2,046	2,123	2,204	2,288	21,665	31,221	30,130	31,909	33,563	11,788	160,276
3. Surcharge on high income individuals, estates, and trusts													
(initial surtax on AGI of 5% in excess of \$10,000,000 and													
additional surtax of 3% on AGI in excess of \$25,000,000)	tyba 12/31/21	40,035	-18,667	22,215	23,436	24,332	24,223	25,465	27,540	28,779	30,413	91,350	227,771
Total of Part 2 - Tax Increases for High-Income Individuals		55,904	2,922	46,072	49,690	52,481	73,854	85,683	87,345	91,127	95,132	207,068	640,210
Part 3 - Modifications of Rules Relating to Retirement Plans													
A. Limitations on High-Income Taxpayers with Large													
Retirement Account Balances													
1. Contribution limit for individual retirement plans of	tyba 12/31/28 &												
high-income taxpayers with large account balances	pyba 12/31/28 -					- Estimate	Included in	ı Item H.3	4.2. <i>Below</i> -				
2. Increase in minimum required distributions for													
high-income taxpayers with large retirement account	tyba 12/31/28 &												
balances.	pyba 12/31/28								3,269	2,713	1,362		7,344
B. Other Provisions Relating to Individual Retirement Plans													
1. Tax treatment of rollovers to Roth IRAs and	5007				405		225	•••			0=6	00-	:
accounts	[23]	73	151	177	195	211	227	239	251	322	878	808	2,724
2. Statute of limitations with respect to IRA noncompliance	[24]	[15]	1	1	1	1	1	1	1	1	1	3	7
3. IRA owners treated as disqualified persons for purposes of	10/21/21							_	•	•	•	-	10
prohibited transaction rules	toa 12/31/21		1	1	1	1	1	2	2	2	2	5	13
Total of Part 3 - Modifications of Rules Relating to Retirement P	lans	73	153	179	196	213	229	241	3,522	3,038	2,242	815	10,087

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
Part 4 - Funding the Internal Revenue Service and Improving Taxpayer Compliance													
Enhancement of Internal Revenue Service resources	DOE -				- Estimate	to be Prov	ided by the	Congressio	onal Budge	t Office			
2. Application of backup withholding with respect to third													
party network transactions	cyba 12/31/21	-2	-1	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	-3	-4
Modification of procedural requirements relating to assessment of penalties	[25]	201	221	113	116	119	122	125	128	132	135	771	1,414
Total of Part 4 - Funding the Internal Revenue Service and													
Improving Taxpayer Compliance		199	220	113	116	119	122	125	128	132	135	768	1,410
Do 45 Odkov Dovičskom													
Part 5 - Other Provisions 1. Modifications to limitation on deduction of excessive													
employee remuneration	tyba 12/31/21	315	639	656	674	683	692	868	881	893	905	2,966	7,205
Extension of tax to fund Black Lung Disability Trust	ty 04 12/31/21	515	057	050	071	005	0,2	000	001	0,5	705	2,700	7,203
Fund [26]	sa 12/31/21	101	137	135	131	32						536	536
3. Prohibited transactions relating to holding DISC or FSC in													
individual retirement account	saoiaoho/a 12/31/21	39	95	126	157	187	217	249	277	292	301	605	1,940
4. Clarification of treatment of DISC gain and distributions of													
certain foreign shareholders	goda 12/31/21	41	86	92	95	96	97	99	101	103	106	410	915
5. Treatment of certain qualified sound recording productions													
[27]	pci tyea DOE	-310	-59	6	43	112	86	43	21	11	12	-208	-35
6. Payment to certain individuals who dye fuel	[28]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	-2	-4
7. Treatment of financial guaranty insurance companies as	. 1 12/21/17 0												
qualifying insurance corporations under passive foreign investment company rules	tyba 12/31/17 & rma DOE	[4]	-2	-4	-5	-8	-9	-12	-14	-14	-14	-18	-81
8. Extension of period of limitation for certain legally married	IIIIa DOE	[4]	-2	-4	-3	-0	-9	-12	-14	-14	-14	-10	-01
couples	DOE	-33	-22									-55	-55
9. Allow an above-the-line deduction of up to \$250 in union	DOL	33										33	55
dues paid (sunset 12/31/25)	tyba 12/31/21	-66	-442	-442	-443	-377						-1,770	-1,770
10. Temporary increase in employer-provided child care credit	·											ŕ	,
(sunset 12/31/25)	tyba 12/31/21	-30	-41	-42	-43	-11						-166	-166
11. Payroll credit for compensation of local news journalists													
(sunset 12/31/26)	cqba DOE	-207	-366	-310	-308	-320	-162					-1,511	-1,674
12. Allow an above-the-line deduction of up to \$250 for													
employee uniforms (sunset 12/31/24)	tyba 12/31/21	-111	-742	-756	-650							-2,259	-2,259
13. Expenses in contingency fee cases	apiori tyba DOE	-172	-659	-532	-390	-231	-101	-105	-101	-95	-66	-1,985	-2,453
14. Increase in research credit against payroll tax for small	4-1- 12/21/21	<i>E</i> 1	0.1	0.5	00	0.4	0.0	102	107	111	112	401	022
businesses	tyba 12/31/21	-51 180	-81 1129	-85 1173	-89 1126	-94 1028	-98 940	-102 865	-107 792	-111 720	-113 654	-401 4,635	-932 8,606
15. Imposition of tax on nicotine	[29]	180	1129	11/3	1120	1028	940	603	192	720	034	4,033	0,000

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
16. Termination of employer credit for paid family and medical leave [30]	tyba 12/31/23			101	219	168	77	44	26	7		489	642
Total of Part 5 - Other Provisions		-304	-328	118	517	1,265	1,740	1,949	1,876	1,806	1,785	1,266	10,415
TOTAL OF SUBTITLE H - RESPONSIBLY FUNDING OUR PRICE	ORITIES	43,680	56,883	122,225	124,437	157,725	186,945	195,452	195,923	194,169	198,663	504,950	1,476,096
NET TOTAL	1	119,526	-54,107	34,208	28,311	96,921	194,849	200,283	192,132	183,912	187,551	-14,202	944,521

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be December 1, 2021.

### Legend for "Effective" column:

apiori = amounts paid, incurred, or received in

apoia = amounts paid or incurred after

apoaa = amounts paid or accrued after

ara = amounts received after

bpisa = buildings placed in service after

cpasa = components produced and sold after

cqba = calendar quarters beginning after

csa = constructive sales after

cya = calendar years after

cyba = calendar years beginning after

da = days after

DOE = date of enactment

duaa = dwelling units acquired after

ema = expenditures made after

epasa = electricity produced and sold after

epoia = expenditures paid or incurred after

fappisa = facilities and property placed in service after

foetcowba = facilities or equipment the construction of

which begins after

fpisa = facilities placed in service after

fsoua = fuel sold or used after

ftcowba = facilities the construction of which begins after

goda = gains or distributions after

itybasd = in taxable years beginning after such date

ityeasd = in taxable years ending after such date

lai = losses arising in

lii = losses incurred in

lo/a = liquidations on or after

oia = obligations issued after

oii = obligations issued in

pa = periods after

pci = productions commencing in

pmf = payments made for

pma = payments made after

ppisa = property placed in service after

ptcowba = property the construction of which

begins after

pybo/a = plan years beginning on or after

roo/a = reorganizations occurring on or after

rosa = repurchases of stock after

rma = reports made after

qccma = qualified cash contributions made after

qsgbpa = qualified second generation biofuel

production after

sa = sales after

saeoa = sales and exchanges only after

saoiaoho/a = stock and other interests acquired or held

on or after

sdata = sales, dispositions, and terminations after

tfpa = transportation fuel produced after

toa = transactions occurring after

too/a = transfers occurring on or after

tyba = taxable years beginning after

tyea = taxable years ending after

tyosfcba = taxable years of specified foreign corporations

beginning after

vaa = vehicles acquired after

- [1] Effective for buildings some portion of which, or of the land on which the building is located, is financed by an obligation which is described in section 42(h)(4)(A) and which is part of an issue the issue date of which is after December 31, 2021.
- [2] Effective for allocations of housing credit dollar amount after December 31, 2021, and for buildings that are described in section 42(h)(4)(B) taking into account only obligations that are part of an issue the issue date of which is after December 31, 2021.
- [3] The amendments made by subsections (a) and (c) shall apply to agreements entered into or amended after the date of the enactment. The amendments made by subsection (b) shall apply to agreements among the owners of the project (including partners, members, and their affiliated organizations) and persons described in section 42(i)(7)(A) of the Internal Revenue Code of 1986 entered in of the Internal Revenue Code of 1986 entered into before, on, or after the date of the enactment.
- [4] Loss of less than \$500,000.
- [5] Applies to taxable years beginning after the date of the enactment of this Act, and in the case of a qualified corporation that is foreign corporation, to taxable years beginning after the date of enactment and to taxable years of United States shareholders in which or with which taxable years of foreign corporations end. The credit is not available for taxable years beginning after December 31, 2031.
- [6] Effective as if included in sec. 1005 of the American Rescue Plan Act of 2021 (Public Law 117-2).

### Footnotes for JCX-45-21 continued:

Extension and modification of energy credit (sunset 12/31/26)	20,568 24,999 3,024 11,028 3,723												
Investment credit for electric transmission property (sunset 12/31/31)	3,024 11,028 3,723 1,077												
Zero-emission nuclear power production credit (sunset 12/31/27)	11,028 3,723 1,077												
Credit for production of clean hydrogen	3,723 1,077												
	1,077												
Refundable new qualified plug-in electric drive motor vehicle credit for individuals													
(sunset 12/31/31)	2 (52												
Extension of the advanced energy project credit	3,672												
Advanced manufacturing investment credit (sunset 12/31/25)	5,632												
Advanced manufacturing production tax credit (sunset 12/31/29)	1,079												
Qualified environmental justice credit (sunset 12/31/31)	7,410												
Clean electricity production credit	2,881												
Clean electricity investment credit	17,868												
Clean fuel production credit	4,664												
Child tax credit	154,322												
Certain improvements to the earned income tax credit extended through 2022 10,381 10,381 10	10,381												
Funds for administration of earned income tax credits in the territories	45												
	143												
Federal Pell Grants excluded from gross income 167 159 153 150 629	629												
Repeal of denial of American Opportunity Tax Credit on basis of felony drug													
conviction 6 6 6 6 5 5 5 23	50												
Establishing rural and underserved pathway to practice training programs for													
post-baccalaureate students, medical students, and medical residents [31]	3,514												
[8] Effective for hydrogen produced after December 31, 2021, at facilities for which construction commenced on or before December 31, 2028; for facilities the construction of which begins after December 31, 2021,													

[8] Effective for hydrogen produced after December 31, 2021, at facilities for which construction commenced on or before December 31, 2028; for facilities the construction of which begins after December 31, 2021 for electricity produced after December 31, 2021, for property placed in service after December 31, 2021, and, for any property the construction of which begins prior to January 1, 2022, only to the extent of the basis thereof attributable to the construction, reconstruction, or erection after December 31, 2026.

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[9] Estimate includes the following budget effects:	<u>2022</u>	2023	2024	<u>2025</u>	<u>2026</u>	2027	2028	2029	2030	2031	2022-26	2022-31
Total Revenue Effect	20	21	23	24	16	16	17	18	19	19	104	193
On-budget effects	12	13	14	15	9	10	10	11	11	12	63	117
Off-budget effects	8	8	9	9	6	7	7	7	8	8	40	77

- [10] Annual base allocation amounts end 2031, unused amounts may be reallocated through 2036.
- [11] Effective for property placed in service after December 31, 2021, and, for any property the construction of which begins prior to January 1, 2022, only to the extent of the basis thereof attributable to the construction, reconstruction, or erection after December 31, 2021.
- [12] Effective for property placed in service after December 31, 2026, and, for any property the construction of which begins prior to January 1, 2027, only to the extent of the basis thereof attributable to the construction, reconstruction, or erection after December 31, 2026.
- [13] For purposes of this subsection, the term 'termination date' means the later of January 1, 2025, or the date on which the Secretary of Health and Human Services makes a written certification to the Secretary that the Secretary of Health and Human Services has fully implemented the program described in section 1948.
- [14] Generally applies to tyba 12/31/22, except that certain other modifications apply to taxable years beginning after the date of enactment.
- [15] Gain of less than \$500,000.

### Footnotes for JCX-45-21 continued:

- [16] Generally effective for taxable years beginning after December 31, 2022, with the following exceptions: changes with respect to foreign tax credit carryback or carryover are effective for taxes paid or accrued in taxable years beginning after December 31, 2022; changes to the treatment of certain asset dispositions are generally effective for transactions after the date of enactment; changes to elections of claims or deductions are effective for taxes paid or accrued for taxable years beginning after December 31, 2021; changes related to redeterminations of foreign taxes are effective for changes that occur 60 days or more after DOE; and changes to the special limitations period are effective for taxes paid, accrued or deemed paid in in taxable years beginning after December 31, 2021.
- [17] Generally applies to taxable years of foreign corporations beginning after December 31, 2022, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end, except that changes to regulatory authority and coordination with other provisions apply to taxable years of foreign corporations beginning after date of enactment, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [18] Generally applies to taxable years of foreign corporations beginning after December 31, 2021 2022, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end, except that changes to the application of the foreign tax credit limitation to amounts included under section 78 and the disallowance of foreign tax credit and deduction with respect to distributions of previously taxed global intangible low-taxed income apply to taxable years of foreign corporations beginning after date of enactment, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [19] Generally applies to distributions made after date of enactment, exception that modifications related to the determination of status as controlled foreign corporation apply to taxable years of foreign corporations beginning after the date of the enactment, and taxable years of United States persons in which or with which such taxable years of foreign corporations end.
- [20] Applies to taxable years of foreign corporations beginning after December 31, 2021, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [21] Applies to taxable years of foreign corporations ending after the date of enactment, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [22] Applies to dividends paid (or amounts treated as dividends) after the date of enactment.
- [23] The amendments made by subsection (a) shall apply to distributions, transfers, and contributions made after December 31, 2021. The amendments made by subsection (b) shall apply to distributions, transfers, and contributions made in taxable years beginning after December 31, 2031.
- [24] Applicable for taxes with respect to which the 3-year period under section 6501(a) of the Internal Revenue Code of 1986 (without regard to the amendment made by this section) ends after December 31, 2021.
- [25] Repeal of Internal Revenue Code section 6751(b) is effective as if included in section 3306 of the Internal Revenue Service Restructuring and Reform Act of 1998. Quarterly certifications of compliance with procedural requirements apply to notices of penalty issued after date of enactment.
- [26] The temporary increase in the amount of tax on coal terminates for sales after December 31, 2025.
- [27] Sunsets 12/31/25 (section 181) and 12/31/26 (section 168(k)).
- [28] Effective for eligible indelibly dyed diesel fuel or kerosene removed on or after the date which is 180 days after the date of enactment.
- [29] The amendments made by this section shall apply to articles removed in calendar quarters beginning after the date which is 180 days after the date of enactment.

[30] Estimate includes the following budget effects:	2022	2023	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	2028	<u>2029</u>	<u>2030</u>	2031	<u>2022-26</u>	2022-31
Total Revenue Effect			101	219	168	77	44	26	7		489	642
On-budget effects			107	227	171	77	44	26	7		505	659
Off-budget effects			-6	-8	-2						-17	-17

[31] Outlays arising from Medicare funding of residency positions are provided by the Congressional Budget Office.