

TABLES OF REVENUE ESTIMATES

Table 1: ADJUSTMENTS TO THE BALANCED BUDGET AND EMERGENCY DEFICIT CONTROL ACT (BBEDCA) BASELINE
(fiscal years, in millions of dollars)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Adjustments to the BBEDCA Baseline:													
Permanently extend increased refundability of the child tax credit 1/	0	0	0	-546	-10,919	-10,985	-11,099	-11,123	-11,085	-11,267	-11,296	-22,450	-78,320
Permanently extend Earned Income Tax Credit (EITC) for larger families and married couples:													
Permanently extend EITC marriage penalty relief 1/	<u>0</u>	<u>0</u>	<u>0</u>	<u>-93</u>	<u>-1,439</u>	<u>-1,419</u>	<u>-1,469</u>	<u>-1,501</u>	<u>-1,505</u>	<u>-1,524</u>	<u>-1,561</u>	<u>-2,951</u>	<u>-10,511</u>
Permanently extend EITC for larger families 1/	<u>0</u>	<u>0</u>	<u>0</u>	<u>-105</u>	<u>-1,997</u>	<u>-2,015</u>	<u>-2,077</u>	<u>-2,130</u>	<u>-2,164</u>	<u>-2,207</u>	<u>-2,261</u>	<u>-4,117</u>	<u>-14,956</u>
Subtotal, permanently extend EITC for larger families and married couples	0	0	0	-198	-3,436	-3,434	-3,546	-3,631	-3,669	-3,731	-3,822	-7,068	-25,467
Permanently extend the American Opportunity Tax Credit (AOTC) 1/	0	0	0	-533	-7,418	-9,776	-9,446	-9,277	-8,995	-8,599	-8,433	-17,727	-62,477
Total, Adjustments to the BBEDCA Baseline	0	0	0	-1,277	-21,773	-24,195	-24,091	-24,031	-23,749	-23,597	-23,551	-47,245	-166,264
Total receipt effect	0	0	0	-565	-5,444	-5,271	-4,896	-4,704	-4,419	-4,015	-3,815	-11,280	-33,129
Total outlay effect	0	0	0	712	16,329	18,924	19,195	19,327	19,330	19,582	19,736	35,965	133,135

Department of the Treasury

Notes:

1/ This proposal affects both receipts and outlays. Both effects are shown above. The outlay effects included in these estimates are listed below.

Permanently extend increased refundability of the child tax credit	0	0	0	547	10,921	10,987	11,100	11,124	11,086	11,268	11,298	22,455	78,331
Permanently extend EITC marriage penalty relief	0	0	0	67	1,334	1,311	1,355	1,380	1,379	1,394	1,427	2,712	9,647
Permanently extend EITC for larger families	0	0	0	98	1,970	1,984	2,044	2,093	2,124	2,165	2,217	4,052	14,695
Permanently extend the AOTC	<u>0</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>2,104</u>	<u>4,642</u>	<u>4,696</u>	<u>4,730</u>	<u>4,741</u>	<u>4,755</u>	<u>4,794</u>	<u>6,746</u>	<u>30,462</u>
Total outlay effect	0	0	0	712	16,329	18,924	19,195	19,327	19,330	19,582	19,736	35,965	133,135

Table 2: RESERVE FOR BUSINESS TAX REFORM THAT IS REVENUE NEUTRAL IN THE LONG RUN 1/
(fiscal years, in millions of dollars)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Reform the U.S. international tax system:													
Restrict deductions for excessive interest of members of financial reporting groups	0	2,566	4,533	4,987	5,485	6,034	6,637	7,301	8,031	8,834	9,718	23,605	64,126
Provide tax incentives for locating jobs and business activity in the United States and remove tax deductions for shipping jobs overseas	0	-13	-22	-23	-24	-25	-25	-27	-28	-29	-31	-107	-247
Repeal delay in the implementation of worldwide interest allocation	0	-1,352	-2,308	-2,400	-2,496	-2,596	-1,055	0	0	0	0	-11,152	-12,207
Extend the exception under subpart F for active financing income	0	-4,081	-7,006	-7,356	-7,724	-8,110	-8,516	-8,942	-9,389	-9,858	-10,351	-34,277	-81,333
Extend the look-through treatment of payments between related controlled foreign corporations (CFC)	0	-488	-838	-880	-924	-971	-1,019	-1,070	-1,124	-1,180	-1,239	-4,101	-9,733
Impose a 19-percent minimum tax on foreign income	0	11,881	19,710	19,873	20,246	20,633	21,200	21,799	22,675	23,478	24,481	92,343	205,976
Impose a 14-percent one-time tax on previously untaxed foreign income 2/ ..													
Limit shifting of income through intangible property transfers	0	88	167	201	237	275	315	361	413	473	542	968	3,072
Disallow the deduction for excess non-taxed reinsurance premiums paid to affiliates	0	346	616	667	708	744	784	829	863	897	934	3,081	7,388
Modify tax rules for dual capacity taxpayers	0	533	914	956	999	1,043	1,089	1,119	1,168	1,220	1,274	4,445	10,315
Tax gain from the sale of a partnership interest on look-through basis	0	183	253	266	279	293	308	323	339	356	374	1,274	2,974
Modify sections 338(h)(16) and 902 to limit credits when non-double taxation exists:													
Extend section 338(h)(16) to certain asset acquisitions	0	42	70	70	70	70	70	70	70	70	70	322	672
Remove foreign taxes from a section 902 corporation's foreign tax pool when earnings are eliminated	0	13	25	32	35	35	35	35	35	36	36	140	317
Subtotal, modify sections 338(h)(16) and 902 to limit credits when non-double taxation exists	0	55	95	102	105	105	105	105	105	106	106	462	989
Close loopholes under subpart F:													
Create a new category of subpart F income for transactions involving digital goods or services	0	437	750	787	827	868	912	957	1,005	1,055	1,108	3,669	8,706
Expand foreign base company sales income to include manufacturing service arrangements	0	922	1,583	1,663	1,744	1,832	1,924	2,020	2,121	2,227	2,339	7,744	18,375
Amend CFC attribution rules	0	30	83	141	205	275	351	435	525	624	731	734	3,400
Eliminate the 30-day grace period before subpart F inclusions	0	60	103	108	114	119	125	131	138	145	152	504	1,195
Subtotal, close loopholes under subpart F	0	1,449	2,519	2,699	2,890	3,094	3,312	3,543	3,789	4,051	4,330	12,651	31,676
Restrict the use of hybrid arrangements that create stateless income:													
Restrict the use of hybrid arrangements that create stateless income	0	45	80	88	97	107	117	129	142	156	172	417	1,133
Limit the application of exceptions under subpart F for certain transactions that use reverse hybrids to create stateless income	0	71	121	127	133	139	147	154	162	170	178	591	1,402
Subtotal, restrict the use of hybrid arrangements that create stateless income	0	116	201	215	230	246	264	283	304	326	350	1,008	2,535
Limit the ability of domestic entities to expatriate	0	113	311	530	769	1,031	1,317	1,630	1,970	2,340	2,743	2,754	12,754
Subtotal, reform the U.S. international tax system	0	11,396	19,145	19,837	20,780	21,796	24,716	27,254	29,116	31,014	33,231	92,954	238,285
Simplification and tax relief for small business:													
Expand and permanently extend increased expensing for small business	-7,200	-10,941	-8,935	-7,300	-6,254	-5,502	-5,108	-4,968	-4,896	-4,929	-5,012	-38,932	-63,845
Expand simplified accounting for small business and establish a uniform definition of small business for accounting methods	0	-5,812	-3,809	-1,443	-762	-507	-492	-493	-488	-479	-472	-12,333	-14,757
Eliminate capital gains taxation on investments in small business stock	0	0	0	0	0	-206	-710	-1,277	-1,811	-2,342	-2,869	-206	-9,215
Increase the limitations for deductible new business expenditures and consolidate provisions for start-up and organizational expenditures	0	-359	-446	-440	-434	-431	-428	-426	-423	-419	-415	-2,110	-4,221
Expand and simplify the tax credit provided to qualified small employers for non-elective contributions to employee health insurance 3/	-24	-305	-328	-218	-174	-148	-102	-113	-76	-60	-26	-1,173	-1,550
Subtotal, simplification and tax relief for small business	-7,224	-17,417	-13,518	-9,401	-7,624	-6,794	-6,840	-7,277	-7,694	-8,229	-8,794	-54,754	-93,588
Incentives for manufacturing, research, and clean energy:													
Enhance and make permanent research incentives	-3,552	-7,529	-9,290	-10,356	-11,389	-12,396	-13,387	-14,370	-15,352	-16,336	-17,327	-50,960	-127,732

Table 2: RESERVE FOR BUSINESS TAX REFORM THAT IS REVENUE NEUTRAL IN THE LONG RUN 1/ -- continued
(fiscal years, in millions of dollars)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
<i>Repeal expensing of intangible drilling costs</i>	0	2,267	3,182	2,351	1,867	1,566	1,243	848	695	723	753	11,233	15,495
<i>Repeal deduction for tertiary injectants</i>	0	7	10	10	10	10	10	10	10	10	10	47	97
<i>Repeal exception to passive loss limitation for working interests in oil and natural gas properties</i>	0	9	17	19	20	20	20	20	20	20	20	85	185
<i>Repeal percentage depletion for oil and natural gas wells</i>	0	1,118	1,790	1,669	1,585	1,498	1,375	1,246	1,122	994	856	7,660	13,253
<i>Repeal domestic manufacturing deduction for oil and natural gas production</i>	0	647	1,115	1,139	1,173	1,208	1,242	1,280	1,321	1,366	1,413	5,282	11,904
<i>Increase geological and geophysical amortization period for independent producers to seven years</i>	0	91	341	537	532	440	337	226	147	125	100	1,941	2,876
Subtotal, eliminate oil and natural gas preferences	0	4,139	6,455	5,725	5,187	4,742	4,227	3,630	3,315	3,238	3,152	26,248	43,810
Eliminate coal preferences:													
<i>Repeal expensing of exploration and development costs</i>	0	40	68	70	74	77	77	75	73	71	69	329	694
<i>Repeal percentage depletion for hard mineral fossil fuels</i>	0	183	299	288	278	266	254	241	228	214	199	1,314	2,450
<i>Repeal capital gains treatment for royalties</i>	0	27	54	53	54	55	58	61	61	62	62	243	547
<i>Repeal domestic manufacturing deduction for the production of coal and other hard mineral fossil fuels</i>	0	45	48	50	53	54	57	59	62	65	68	250	561
Subtotal, eliminate coal preferences	0	295	469	461	459	452	446	436	424	412	398	2,136	4,252
<i>Treat publicly-traded partnerships for fossil fuels as C corporations</i>	0	0	0	0	0	0	303	322	341	358	375	0	1,699
Subtotal, eliminate fossil fuel tax preferences	0	4,434	6,924	6,186	5,646	5,194	4,976	4,388	4,080	4,008	3,925	28,384	49,761
Reform the treatment of financial and insurance industry products:													
Require that derivative contracts be marked to market with resulting gain or loss treated as ordinary	0	2,926	4,769	4,138	2,731	1,733	1,186	731	531	535	516	16,297	19,796
Modify rules that apply to sales of life insurance contracts	0	23	43	46	48	50	54	56	58	61	63	210	502
Modify proration rules for life insurance company general and separate accounts	0	385	676	722	762	792	816	836	843	849	862	3,337	7,543
Expand pro rata interest expense disallowance for corporate-owned life insurance	0	65	159	252	364	492	641	809	980	1,160	1,357	1,332	6,279
Conform net operating loss rules of life insurance companies to those of other corporations	0	15	27	29	30	32	34	36	37	39	40	133	319
Subtotal, reform the treatment of financial and insurance industry products	0	3,414	5,674	5,187	3,935	3,099	2,731	2,468	2,449	2,644	2,838	21,309	34,439
Other revenue changes and loophole closers:													
Repeal last-in, first-out method of accounting for inventories	0	5,505	7,866	7,812	8,012	7,908	8,070	7,752	7,644	7,931	7,592	37,103	76,092
Repeal lower-of-cost-or-market inventory accounting method	0	743	1,491	1,501	1,511	889	266	278	291	304	317	6,135	7,591
Modify like-kind exchange rules for real property and collectibles	0	659	2,005	2,026	2,048	2,070	2,094	2,119	2,145	2,174	2,202	8,808	19,542
Modify depreciation rules for purchases of general aviation passenger aircraft	0	108	338	499	531	596	593	395	198	139	141	2,072	3,538
Expand the definition of substantial built-in loss for purposes of partnership loss transfers	0	6	7	7	7	7	8	8	10	10	10	34	80
Extend partnership basis limitation rules to nondeductible expenditures	0	69	97	102	105	108	110	112	114	116	118	481	1,051
Limit the importation of losses under related party loss limitation rules	0	63	87	92	95	97	99	100	102	104	106	434	945
Deny deduction for punitive damages	0	30	43	44	45	46	47	48	49	51	52	208	455
Conform corporate ownership standards	0	1	17	32	33	34	35	36	38	40	42	117	308
Tax corporate distributions as dividends:													
<i>Prevent elimination of earnings and profits through distributions of certain stock with basis attributable to dividend equivalent redemptions</i>													
<i>Prevent use of leveraged distributions from related foreign corporations to avoid dividend treatment</i>	0	13	23	23	24	25	26	27	28	30	31	108	250
<i>Treat purchases of hook stock by a subsidiary as giving rise to deemed distributions</i>	0	3	5	5	6	6	6	6	7	7	7	25	58
<i>Repeal gain limitation for dividends received in reorganization exchanges</i> ..	0	32	54	58	60	63	66	70	73	76	80	267	632
Subtotal, tax corporate distributions as dividends	0	48	82	86	90	94	98	103	108	113	118	400	940

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Repeal Federal Insurance Contributions Act tip credit	0	480	993	1,062	1,137	1,216	1,301	1,389	1,483	1,581	1,687	4,888	12,329
Repeal the excise tax credit for distilled spirits with flavor and wine additives .	0	85	112	112	112	112	112	112	112	112	112	533	1,093
Subtotal, other revenue changes and loophole closers	0	7,797	13,138	13,375	13,726	13,177	12,833	12,452	12,294	12,675	12,497	61,213	123,964
Total, Reserve for Business Tax Reform that is Revenue Neutral in the Long Run	-11,238	1,249	18,851	18,969	16,114	14,138	15,226	14,426	13,748	14,215	14,529	69,321	141,465
Total receipt effect	-11,232	1,631	20,336	22,054	21,618	21,396	23,729	24,648	25,888	28,294	30,555	87,035	220,149
Total outlay effect	6	382	1,485	3,085	5,504	7,258	8,503	10,222	12,140	14,079	16,026	17,714	78,684

Department of the Treasury

Notes:

1/ Presentation in this table does not reflect the order in which these proposals were estimated.

2/ The Administration believes that this proposal should be enacted in the context of comprehensive business tax reform that is revenue neutral in the long run. However, the proposal generates one-time transition revenue in the short run, which the Budget proposes to dedicate to surface transportation reauthorization. Therefore, the effect of the proposal on receipts, shown below, is also included in the Budget proposals presented in Table 3 and is counted in the Budget's receipts and deficit totals.

Impose a 14-percent one-time tax on previously untaxed foreign income ...	0	34,559	56,407	54,420	52,434	50,448	19,861	0	0	0	0	248,268	268,129
---	---	--------	--------	--------	--------	--------	--------	---	---	---	---	---------	---------

3/ This proposal affects both receipts and outlays. Both effects are shown above. The outlay effects included in these estimates are listed below.

Expand and simplify the tax credit provided to qualified small employers for non-elective contributions to employee health insurance	6	76	68	32	23	21	11	10	8	8	4	220	261
Modify and permanently extend renewable electricity production tax credit and investment tax credit	0	0	20	47	63	71	78	83	90	95	101	201	648
Provide a carbon dioxide investment and sequestration tax credit	0	0	0	0	729	728	170	28	48	65	76	1,457	1,844
Provide AFFB and expand eligible uses	0	253	1,154	2,483	3,874	5,319	6,811	8,345	9,909	11,492	13,090	13,083	62,730
Allow eligible uses of AFFB to include financing all qualified private activity bond program categories	0	53	243	523	815	1,119	1,433	1,756	2,085	2,419	2,755	2,753	13,201
Total outlay effect	6	382	1,485	3,085	5,504	7,258	8,503	10,222	12,140	14,079	16,026	17,714	78,684

4/ This provision is estimated to have zero receipt effect under the Administration's current economic projections.

Table 3: BUDGET PROPOSALS 1/ 2/

(fiscal years, in millions of dollars)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Tax reform for families and individuals:													
Reform child care tax incentives 3/	0	-4,024	-4,191	-4,429	-4,639	-4,841	-5,052	-5,292	-5,532	-5,615	-6,257	-22,124	-49,872
Simplify and better target tax benefits for education:													
Expand and modify the AOTC and repeal Lifetime Learning Credits 3/	0	25	-869	-2,651	-2,661	-3,114	-3,454	-4,103	-4,387	-4,995	-5,084	-9,270	-31,293
Make Pell Grants excludable from income 3/	0	-30	-1,041	-2,182	-2,105	-2,050	-2,052	-2,031	-2,035	-2,032	-1,997	-7,408	-17,555
Modify reporting of tuition expenses and scholarships on Form 1098-T 3/ ..	0	5	51	63	65	67	70	72	73	75	77	251	618
Repeal the student loan interest deduction and provide exclusion for certain debt relief and scholarships 3/	0	-5	-13	-14	-14	-15	73	169	259	345	463	-61	1,248
Repeal Coverdells and reduce the Federal tax benefits of qualified tuition programs	0	0	11	31	55	85	121	163	212	270	336	182	1,284
Subtotal, simplify and better target tax benefits for education	0	-5	-1,861	-4,753	-4,660	-5,027	-5,242	-5,730	-5,878	-6,337	-6,205	-16,306	-45,698
Provide for automatic enrollment in IRAs, including a small employer tax credit, increase the tax credit for small employer plan start-up costs, and provide an additional tax credit for small employer plans newly offering auto-enrollment 3/	0	0	-993	-1,589	-1,700	-1,754	-1,831	-2,005	-2,176	-2,410	-2,661	-6,036	-17,119
Expand penalty-free withdrawals for long-term unemployed	0	-162	-235	-240	-245	-250	-255	-260	-265	-270	-276	-1,132	-2,458
Require retirement plans to allow long-term part-time workers to participate ..	0	-39	-55	-54	-53	-52	-50	-47	-44	-40	-34	-253	-468
Facilitate annuity portability													
Simplify minimum required distribution rules	0	-5	-5	-3	4	14	30	51	74	105	142	5	407
Allow all inherited plan and IRA balances to be rolled over within 60 days													
Expand the EITC for workers without qualifying children 3/	0	-460	-6,256	-6,297	-6,350	-6,481	-6,612	-6,716	-6,804	-6,921	-7,047	-25,844	-59,944
Simplify the rules for claiming the EITC for workers without qualifying children 3/	0	-44	-593	-599	-588	-605	-620	-631	-642	-653	-678	-2,429	-5,653
Provide a second-earner tax credit 3/	0	-2,067	-9,007	-9,104	-9,383	-9,502	-9,727	-9,872	-9,936	-10,127	-10,306	-39,063	-89,031
Extend exclusion from income for cancellation of certain home mortgage debt	-2,542	-3,265	-2,978	-724	0	0	0	0	0	0	0	-6,967	-6,967
Subtotal, tax reform for families and individuals	-2,542	-10,071	-26,174	-27,792	-27,614	-28,498	-29,359	-30,502	-31,203	-32,268	-33,322	-120,149	-276,803
Reforms to capital gains taxation, upper-income tax benefits, and the taxation of financial institutions:													
Reduce the value of certain tax expenditures	0	28,028	46,032	50,592	54,995	59,478	63,843	68,379	72,914	77,231	81,734	239,125	603,226
Reform the taxation of capital income	3,634	9,048	20,705	18,041	21,448	21,892	21,538	22,276	23,178	24,292	25,466	91,134	207,884
Implement the Buffett Rule by imposing a new "Fair Share Tax"	0	6,671	-93	1,178	2,810	3,695	3,872	4,008	4,177	4,351	4,507	14,261	35,176
Impose a financial fee	0	5,644	11,084	10,978	11,208	11,470	11,734	12,003	12,280	12,562	12,851	50,384	111,814
Subtotal, reforms to capital gains taxation, upper-income tax benefits, and the taxation of financial institutions	3,634	49,391	77,728	80,789	90,461	96,535	100,987	106,666	112,549	118,436	124,558	394,904	958,100
Loophole closers:													
Require current inclusion in income of accrued market discount and limit the accrual amount for distressed debt	0	4	12	20	27	34	41	49	58	68	78	97	391
Require that the cost basis of stock that is a covered security must be determined using an average cost basis method	0	0	69	209	353	507	597	620	645	673	702	1,138	4,375
Tax carried (profits) interests as ordinary income	0	1,294	2,417	2,421	2,316	2,204	2,094	1,692	1,271	1,036	953	10,652	17,698
Require non-spouse beneficiaries of deceased IRA owners and retirement plan participants to take inherited distributions over no more than five years	0	87	237	400	567	737	786	748	694	640	583	2,028	5,479
Limit the total accrual of tax-favored retirement benefits	0	1,418	1,987	2,213	2,287	2,438	2,634	2,785	3,183	3,396	3,702	10,343	26,043
Conform Self-Employment Contribution Act taxes for professional service businesses	0	4,465	6,268	6,622	6,977	7,372	7,837	8,371	8,837	9,248	8,554	31,704	74,551
Limit Roth conversions to pre-tax dollars	0	0	14	23	24	38	49	50	51	67	79	99	395
Eliminate deduction for dividends on stock of publicly-traded corporations held in employee stock ownership plans	0	589	830	851	865	879	892	907	922	936	951	4,014	8,622
Repeal exclusion of net unrealized appreciation in employer securities	0	145	245	249	254	260	265	270	275	281	287	1,153	2,531

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Disallow the deduction for charitable contributions that are a prerequisite for purchasing tickets to college sporting events	0	126	201	218	233	249	266	283	302	323	345	1,027	2,546
Subtotal, loophole closers	0	8,128	12,280	13,226	13,903	14,718	15,461	15,775	16,238	16,668	16,234	62,255	142,631
Incentives for job creation, clean energy, and manufacturing:													
Designate Promise Zones 3/	0	-604	-1,130	-1,010	-938	-890	-852	-813	-791	-792	-807	-4,572	-8,627
Provide a tax credit for the production of advanced technology vehicles	0	-581	-475	-512	-567	-507	-418	-299	6	197	209	-2,642	-2,947
Provide a tax credit for medium- and heavy-duty alternative-fuel commercial vehicles	0	-46	-76	-77	-80	-61	-26	-5	0	0	0	-340	-371
Modify and extend the tax credit for the construction of energy-efficient new homes	-60	-132	-164	-195	-227	-252	-270	-286	-302	-329	-341	-970	-2,498
Reduce excise taxes on liquefied natural gas to bring into parity with diesel ..	0	-4	-5	-6	-6	-6	-7	-7	-9	-9	-10	-27	-69
Enhance and modify the conservation easement deduction:													
<i>Permanently enhance incentives and reform the deduction for donations of conservation easements</i>	<i>-59</i>	<i>-153</i>	<i>-102</i>	<i>-20</i>	<i>3</i>	<i>3</i>	<i>2</i>	<i>3</i>	<i>3</i>	<i>3</i>	<i>4</i>	<i>-269</i>	<i>-254</i>
<i>Pilot an allocable credit for conservation contributions and report to Congress</i>	<i>-5</i>	<i>-19</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-25</i>	<i>-119</i>	<i>-244</i>
<i>Eliminate the deduction for contributions of conservation easements on golf courses</i>	<i>5</i>	<i>21</i>	<i>38</i>	<i>50</i>	<i>56</i>	<i>60</i>	<i>62</i>	<i>66</i>	<i>69</i>	<i>73</i>	<i>76</i>	<i>225</i>	<i>571</i>
<i>Restrict deductions and harmonize the rules for contributions of conservation easements for historic preservation</i>	<i>2</i>	<i>7</i>	<i>13</i>	<i>17</i>	<i>20</i>	<i>21</i>	<i>22</i>	<i>23</i>	<i>24</i>	<i>25</i>	<i>27</i>	<i>78</i>	<i>199</i>
Subtotal, enhance and modify the conservation easement deduction	<i>-57</i>	<i>-144</i>	<i>-76</i>	<i>22</i>	<i>54</i>	<i>59</i>	<i>61</i>	<i>67</i>	<i>71</i>	<i>76</i>	<i>82</i>	<i>-85</i>	<i>272</i>
Subtotal, incentives for job creation, clean energy, and manufacturing	-117	-1,511	-1,926	-1,778	-1,764	-1,657	-1,512	-1,343	-1,025	-857	-867	-8,636	-14,240
Modify estate and gift tax provisions:													
Restore the estate, gift, and generation-skipping transfer (GST) tax parameters in effect in 2009	0	0	14,611	15,938	17,310	18,723	20,444	22,230	24,261	26,612	29,182	66,582	189,311
Require consistency in value for transfer and income tax purposes	0	0	267	279	303	337	356	383	407	438	467	1,186	3,237
Modify transfer tax rules for grantor retained annuity trusts and other grantor trusts	0	0	1,054	1,198	1,359	1,574	1,892	2,294	2,637	3,073	3,273	5,185	18,354
Limit duration of GST tax exemption					Negligible revenue effect								
Extend the lien on estate tax deferrals where estate consists largely of interest in closely held business	0	0	23	23	24	25	27	29	31	32	34	95	248
Modify GST tax treatment of Health and Education Exclusion Trusts	0	0	-32	-31	-29	-28	-25	-24	-22	-21	-19	-120	-231
Simplify gift tax exclusion for annual gifts	0	0	78	155	217	320	389	428	517	618	724	770	3,446
Expand applicability of definition of executor					Negligible revenue effect								
Subtotal, modify estate and gift tax provisions	0	0	16,001	17,562	19,184	20,951	23,083	25,340	27,831	30,752	33,661	73,698	214,365
Other revenue raisers:													
Increase and modify Oil Spill Liability Trust Fund financing	0	105	150	155	160	165	168	176	177	181	191	735	1,628
Reinstate Superfund taxes:													
<i>Reinstate and extend Superfund excise taxes</i>	<i>0</i>	<i>589</i>	<i>791</i>	<i>798</i>	<i>805</i>	<i>811</i>	<i>819</i>	<i>826</i>	<i>833</i>	<i>839</i>	<i>855</i>	<i>3,794</i>	<i>7,966</i>
<i>Reinstate Superfund environmental income tax</i>	<i>0</i>	<i>996</i>	<i>1,257</i>	<i>1,282</i>	<i>1,305</i>	<i>1,315</i>	<i>1,341</i>	<i>1,379</i>	<i>1,426</i>	<i>1,468</i>	<i>1,508</i>	<i>6,155</i>	<i>13,277</i>
Subtotal, reinstate Superfund taxes	<i>0</i>	<i>1,585</i>	<i>2,048</i>	<i>2,080</i>	<i>2,110</i>	<i>2,126</i>	<i>2,160</i>	<i>2,205</i>	<i>2,259</i>	<i>2,307</i>	<i>2,363</i>	<i>9,949</i>	<i>21,243</i>
Increase tobacco taxes and index for inflation	0	8,434	10,826	10,663	10,633	10,301	9,860	9,403	8,850	8,342	7,830	50,857	95,142
Make unemployment insurance surtax permanent	0	1,108	1,527	1,552	1,575	1,596	1,620	1,643	1,669	1,695	1,701	7,358	15,686
Expand Federal Unemployment Tax Act base	0	0	3,634	3,618	3,457	3,600	3,901	6,485	6,313	6,647	7,100	14,309	44,755
Subtotal, other revenue raisers	0	11,232	18,185	18,068	17,935	17,788	17,709	19,912	19,268	19,172	19,185	83,208	178,454
Reduce the tax gap and make reforms:													
Expand information reporting:													
Improve information reporting for certain businesses and contractors:													
<i>Require a certified TIN from contractors and allow certain withholding</i>	<i>0</i>	<i>16</i>	<i>39</i>	<i>64</i>	<i>88</i>	<i>92</i>	<i>96</i>	<i>100</i>	<i>105</i>	<i>109</i>	<i>114</i>	<i>299</i>	<i>823</i>
<i>Require information reporting for private separate accounts of life insurance companies</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>1</i>	<i>3</i>	<i>8</i>
Subtotal, improve information reporting for certain businesses and contractors	<i>0</i>	<i>16</i>	<i>39</i>	<i>65</i>	<i>89</i>	<i>93</i>	<i>97</i>	<i>101</i>	<i>106</i>	<i>110</i>	<i>115</i>	<i>302</i>	<i>831</i>

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Subtotal, strengthen tax administration	0	966	2,487	3,994	5,654	7,313	8,747	9,798	10,468	10,957	11,341	20,414	71,725
Subtotal, reduce the tax gap and make reforms	0	1,175	3,116	5,063	6,926	8,683	10,223	11,383	12,173	12,785	13,298	24,963	84,825
Simplify the tax system:													
Modify adoption credit to allow tribal determination of special needs	0	0	0	0	0	0	-1	-1	-1	-1	-1	0	-5
Repeal non-qualified preferred stock designation	0	26	44	43	41	38	35	30	26	23	20	192	326
Repeal preferential dividend rule for publicly traded and publically offered real estate investment trusts													
Reform excise tax based on investment income of private foundations	0	0	-6	-5	-5	-6	-6	-6	-6	-6	-7	-22	-53
Remove bonding requirements for certain taxpayers subject to Federal excise taxes on distilled spirits, wine, and beer													
Simplify arbitrage investment restrictions	0	0	-2	-10	-18	-28	-38	-46	-58	-68	-76	-58	-344
Simplify single-family housing mortgage bond targeting requirements	0	0	-1	-3	-5	-7	-10	-12	-17	-20	-22	-16	-97
Streamline private business limits on governmental bonds	0	0	-1	-3	-5	-7	-9	-11	-13	-15	-17	-16	-81
Repeal technical terminations of partnerships	0	10	16	18	20	22	24	26	28	29	31	86	224
Repeal anti-churning rules of section 197	0	-24	-99	-198	-281	-338	-370	-378	-378	-378	-378	-940	-2,822
Repeal special estimated tax payment provision for certain insurance companies													
Repeal the telephone excise tax	0	-296	-349	-308	-266	-225	-208	-161	-128	-80	-31	-1,444	-2,052
Increase the standard mileage rate for automobile use by volunteers	0	-15	-47	-48	-49	-50	-51	-52	-53	-55	-56	-209	-476
Consolidate contribution limitations for charitable deductions and extend the carryforward period for excess charitable contribution deduction amounts	0	-88	-49	-5	-6	-6	-6	-482	-1,168	-1,801	-2,379	-154	-5,990
Exclude from gross income subsidies from public utilities for purchase of water runoff management													
Provide relief for certain accidental dual citizens	0	-60	-103	-55	-23	-24	-25	-26	-28	-29	-30	-265	-403
Subtotal, simplify the tax system	0	-447	-597	-574	-597	-631	-665	-1,119	-1,796	-2,401	-2,946	-2,846	-11,773
User fee:													
Reform inland waterways funding	0	113	113	113	113	113	113	113	113	113	113	565	1,130
Subtotal, user fee	0	113	113	113	113	113	113	113	113	113	113	565	1,130
Other initiatives:													
Allow offset of Federal income tax refunds to collect delinquent State income taxes for out-of-state residents													
Authorize the limited sharing of business tax return information to improve the accuracy of important measures of the economy													
Eliminate certain reviews conducted by the U.S. Treasury Inspector General for Tax Administration													
Modify indexing to prevent deflationary adjustments													
Subtotal, other initiatives	0	0	0	0	0	0	0	0	0	0	0	0	0
Impose a 14-percent one-time tax on previously untaxed foreign income 4/													
0	34,559	56,407	54,420	52,434	50,448	19,861	0	0	0	0	0	248,268	268,129
Total, Budget Proposals	975	92,569	155,133	159,097	170,981	178,450	155,901	146,225	154,148	162,400	169,914	756,230	1,544,818
Total receipt effect	975	93,765	164,803	171,875	183,824	191,512	169,495	160,271	168,647	177,281	185,031	805,779	1,666,504
Total outlay effect	0	1,196	9,670	12,778	12,843	13,062	13,594	14,046	14,499	14,881	15,117	49,549	121,686

Department of the Treasury

Notes:

1/ Presentation in this table does not reflect the order in which these proposals were estimated.

2/ Table 12-4 in the Analytical Perspectives of the FY 2016 Budget includes the effects of a number of proposals that are not reflected here. These proposals would: reform the unemployment insurance (UI) extended benefits program, modernize the UI program, levy a fee on the production of hardrock minerals to restore abandoned mines, return fees on production of coal to pre-2006 levels to restore abandoned mines, enhance UI program integrity, reauthorize special domestic nuclear utilities, extend Generalized System of Preferences, extend African Growth Opportunity Act, extend the Children's Health Insurance Program through 2019, create State option to provide 12-month continuous Medicaid eligibility for adults, extend reserve depletion date for Social Security's Disability Insurance program, and enact comprehensive immigration reform.

3/ This proposal affects both receipts and outlays. Both effects are shown above. The outlay effects included in these estimates are listed below.

Reform child care tax incentives	0	932	969	1,014	1,066	1,107	1,139	1,190	1,231	1,227	1,265	5,088	11,140
--	---	-----	-----	-------	-------	-------	-------	-------	-------	-------	-------	-------	--------

Table 3: BUDGET PROPOSALS 1/ 2/ -- continued
(fiscal years, in millions of dollars)

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2016-20	2016-25
Expand and modify the AOTC and repeal Lifetime Learning Credits	0	0	1,125	2,934	2,948	3,047	3,376	3,686	3,998	4,291	4,392	10,054	29,797
Make Pell Grants excludable from income	0	0	743	1,905	1,844	1,801	1,825	1,817	1,826	1,833	1,802	6,293	15,396
Modify reporting of tuition expenses and scholarships on Form 1098-T	0	0	-6	-17	-18	-19	-21	-22	-22	-23	-24	-60	-172
Repeal the student loan interest deduction and provide exclusion for certain debt relief and scholarships	0	0	0	0	0	0	-3	-10	-17	-26	-35	0	-91
Provide for automatic enrollment in IRAs, including a small employer tax credit, increase the tax credit for small employer plan start-up costs, and provide an additional tax credit for small employer plans newly offering auto-enrollment	0	0	127	195	200	209	212	215	220	225	229	731	1,832
Expand the EITC for workers without qualifying children	0	276	5,519	5,553	5,600	5,709	5,825	5,914	5,997	6,090	6,198	22,657	52,681
Simplify the rules for claiming the EITC for workers without qualifying children	0	26	522	527	517	532	545	555	565	574	596	2,124	4,959
Provide a second-earner tax credit	0	0	732	729	750	740	761	768	770	762	767	2,951	6,779
Designate Promise Zones	0	12	28	29	31	32	34	35	37	38	41	132	317
Provide the IRS with greater flexibility to address correctable errors	0	-26	-53	-54	-55	-55	-56	-57	-59	-60	-62	-243	-537
Rationalize tax return filing due dates so they are staggered	0	-22	-22	-22	-23	-23	-23	-24	-24	-25	-25	-112	-233
Explicitly provide that the Department of the Treasury and IRS have the authority to regulate all paid tax return preparers	<u>0</u>	<u>-2</u>	<u>-14</u>	<u>-15</u>	<u>-17</u>	<u>-18</u>	<u>-20</u>	<u>-21</u>	<u>-23</u>	<u>-25</u>	<u>-27</u>	<u>-66</u>	<u>-182</u>
Total outlay effect	0	1,196	9,670	12,778	12,843	13,062	13,594	14,046	14,499	14,881	15,117	49,549	121,686

4/ The Administration believes that this proposal should be enacted in the context of comprehensive business tax reform that is revenue neutral in the long run. However, the proposal generates one-time transition revenue in the short run, which the Budget proposes to dedicate to surface transportation reauthorization. Therefore, the effect of the proposal on receipts, shown here, is included in the Budget's receipts and deficit totals.