

**REVENUE ESTIMATES OF THE
ADMINISTRATION'S FISCAL YEAR 2017 REVENUE PROPOSALS 1/ 2/**
(fiscal years, in millions of dollars)

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2017-21	2017-26
ELEMENTS OF BUSINESS TAX REFORM													
Reform the U.S. international tax system:													
Restrict deductions for excessive interest of members of financial reporting groups	0	2,822	4,986	5,485	6,033	6,637	7,300	8,030	8,833	9,717	10,688	25,963	70,531
Provide tax incentives for locating jobs and business activity in the United States and remove tax deductions for shipping jobs overseas	0	-11	-18	-20	-20	-21	-22	-23	-24	-26	-26	-90	-211
Repeal delay in the implementation of worldwide interest allocation	0	-1,406	-2,400	-2,496	-2,596	-1,055	0	0	0	0	0	-9,953	-9,953
Impose a 19-percent minimum tax on foreign income	0	24,201	38,418	35,969	33,192	32,831	34,211	35,651	37,117	38,635	40,166	164,611	350,391
Impose a 14-percent one-time tax on previously untaxed foreign income													
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	411	657	697	731	771	815	848	882	918	958	3,267	7,688
Modify tax rules for dual capacity taxpayers	0	465	814	878	930	970	992	1,032	1,074	1,121	1,359	4,057	9,635
Tax gain from the sale of a partnership interest on look-through basis	0	146	251	264	277	291	305	321	337	354	371	1,229	2,917
Modify sections 338(h)(16) and 902 to limit credits when non-double taxation exists:													
<i>Extend section 338(h)(16) to certain asset acquisitions</i>	<i>0</i>	<i>42</i>	<i>70</i>	<i>322</i>	<i>672</i>								
<i>Remove foreign taxes from a section 902 corporation's foreign tax pool when earnings are eliminated</i>	<i>0</i>	<i>17</i>	<i>32</i>	<i>35</i>	<i>35</i>	<i>35</i>	<i>35</i>	<i>35</i>	<i>36</i>	<i>36</i>	<i>37</i>	<i>154</i>	<i>333</i>
Subtotal, modify sections 338(h)(16) and 902 to limit credits when non-double taxation exists	0	59	102	105	105	105	105	105	106	106	107	476	1,005
Close loopholes under subpart F:													
<i>Create a new category of subpart F income for transactions involving digital goods or services</i>	<i>0</i>	<i>459</i>	<i>787</i>	<i>827</i>	<i>868</i>	<i>912</i>	<i>957</i>	<i>1,005</i>	<i>1,055</i>	<i>1,108</i>	<i>1,163</i>	<i>3,853</i>	<i>9,141</i>
<i>Expand foreign base company sales income to include manufacturing service arrangements</i>	<i>0</i>	<i>968</i>	<i>1,662</i>	<i>1,745</i>	<i>1,832</i>	<i>1,924</i>	<i>2,020</i>	<i>2,121</i>	<i>2,227</i>	<i>2,338</i>	<i>2,455</i>	<i>8,131</i>	<i>19,292</i>
<i>Amend controlled foreign corporation attribution rules</i>	<i>0</i>	<i>30</i>	<i>83</i>	<i>141</i>	<i>205</i>	<i>275</i>	<i>351</i>	<i>435</i>	<i>525</i>	<i>624</i>	<i>731</i>	<i>734</i>	<i>3,400</i>
<i>Eliminate the 30-day grace period before subpart F inclusions</i>	<i>0</i>	<i>60</i>	<i>103</i>	<i>108</i>	<i>114</i>	<i>119</i>	<i>125</i>	<i>131</i>	<i>138</i>	<i>145</i>	<i>152</i>	<i>504</i>	<i>1,195</i>
Subtotal, close loopholes under subpart F	0	1,517	2,635	2,821	3,019	3,230	3,453	3,692	3,945	4,215	4,501	13,222	33,028
Restrict the use of hybrid arrangements that create stateless income:													
<i>Restrict the use of hybrid arrangements that create stateless income</i>	<i>0</i>	<i>45</i>	<i>80</i>	<i>88</i>	<i>97</i>	<i>107</i>	<i>117</i>	<i>129</i>	<i>142</i>	<i>156</i>	<i>172</i>	<i>417</i>	<i>1,133</i>
<i>Limit the application of exceptions under subpart F for certain transactions that use reverse hybrids to create stateless income</i>	<i>0</i>	<i>70</i>	<i>121</i>	<i>127</i>	<i>133</i>	<i>140</i>	<i>147</i>	<i>154</i>	<i>162</i>	<i>170</i>	<i>178</i>	<i>591</i>	<i>1,402</i>
Subtotal, restrict the use of hybrid arrangements that create stateless income	0	115	201	215	230	247	264	283	304	326	350	1,008	2,535
Limit the ability of domestic entities to expatriate	0	118	327	556	807	1,083	1,383	1,711	2,068	2,457	2,880	2,891	13,390
Subtotal, reform the U.S. international tax system	0	28,525	46,140	44,675	42,945	45,364	49,121	52,011	55,055	58,296	61,896	207,649	484,028
Simplification and tax relief for small business:													
Expand expensing for small business	0	-2,101	-2,863	-2,072	-1,625	-1,335	-1,132	-1,009	-961	-971	-997	-9,996	-15,066
Expand simplified accounting for small business and establish a uniform definition of small business for accounting methods	0	-6,248	-4,874	-2,819	-1,975	-1,814	-1,745	-1,724	-1,819	-1,839	-1,845	-17,730	-26,702
Increase the limitations for deductible new business expenditures and consolidate provisions for start-up and organizational expenditures	0	-490	-484	-477	-473	-471	-469	-465	-461	-456	-452	-2,395	-4,698
Expand and simplify the tax credit provided to qualified small employers for non-elective contributions to employee health insurance 3/	-10	-170	-163	-146	-131	-100	-118	-80	-60	-27	-14	-710	-1,009
Subtotal, simplification and tax relief for small business	-10	-9,009	-8,384	-5,514	-4,204	-3,720	-3,464	-3,278	-3,301	-3,293	-3,308	-30,831	-47,475
Incentives for job creation, manufacturing, research, and clean energy:													
Enhance and simplify research incentives	0	-959	-1,896	-2,154	-2,409	-2,660	-2,913	-3,166	-3,426	-3,690	-3,964	-10,078	-27,237
Extend and modify certain employment tax credits, including incentives for hiring veterans	0	-2	-7	-9	-511	-1,062	-1,194	-1,308	-1,406	-1,492	-1,573	-1,591	-8,564
Provide new Manufacturing Communities tax credit	0	-97	-277	-483	-619	-693	-751	-788	-677	-417	-107	-2,169	-4,909

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Provide Community College Partnership tax credit	0	-109	-277	-380	-406	-405	-273	-124	-96	-79	-64	-1,577	-2,213
Designate Promise Zones 3/	0	-301	-610	-681	-829	-902	-836	-786	-752	-730	-723	-3,323	-7,150
Modify and permanently extend renewable electricity production tax credit and investment tax credit 3/	0	-122	-230	-345	-587	-1,041	-1,359	-1,633	-3,990	-6,549	-8,287	-2,325	-24,143
Modify and permanently extend the deduction for energy-efficient commercial building property	0	-159	-268	-281	-285	-283	-279	-277	-273	-270	-272	-1,276	-2,647
Provide a carbon dioxide investment and sequestration tax credit 3/	0	-9	-34	-47	-48	-388	-709	-409	-791	-677	-338	-526	-3,450
Provide additional tax credits for investment in qualified property used in a qualifying advanced energy manufacturing project	0	-74	-194	-1,118	-787	-111	-4	34	28	14	3	-2,284	-2,209
Extend the tax credit for second generation biofuel production	0	-87	-157	-172	-175	-175	-175	-153	-118	-83	-48	-766	-1,343
Provide a tax credit for the production of advanced technology vehicles	0	-505	-503	-497	-469	-386	-220	-83	161	296	267	-2,360	-1,939
Provide a tax credit for medium- and heavy-duty alternative-fuel commercial vehicles	0	-44	-78	-85	-89	-93	-61	-15	0	0	0	-389	-465
Modify and extend the tax credit for the construction of energy-efficient new homes	0	-82	-182	-238	-268	-288	-306	-323	-351	-382	-405	-1,058	-2,825
Subtotal, incentives for job creation, manufacturing, research, and clean energy	0	-2,550	-4,713	-6,490	-7,482	-8,487	-9,080	-9,031	-11,691	-14,059	-15,511	-29,722	-89,094
Incentives to promote regional growth:													
Modify and permanently extend the New Markets Tax Credit	0	0	0	0	-97	-278	-483	-716	-970	-1,235	-1,505	-375	-5,284
Reform and expand the Low-Income Housing Tax Credit (LIHTC):													
Allow conversion of private activity bond volume cap into LIHTCs	0	-17	-93	-262	-499	-754	-1,014	-1,281	-1,555	-1,837	-2,128	-1,625	-9,440
Encourage mixed income occupancy by allowing LIHTC-supported projects to elect a criterion employing a restriction on average income													Negligible revenue effect
Add furthering fair housing and preservation of publically assisted affordable housing to allocation criteria													Negligible revenue effect
Remove the qualified Census tract population cap	-1	-2	-6	-10	-13	-15	-17	-19	-21	-23	-24	-46	-150
Implement requirement that LIHTC-supported housing protect victims of domestic abuse													Negligible revenue effect
Subtotal, reform and expand LIHTC	-1	-19	-99	-272	-512	-769	-1,031	-1,300	-1,576	-1,860	-2,152	-1,671	-9,590
Subtotal, incentives to promote regional growth	-1	-19	-99	-272	-609	-1,047	-1,514	-2,016	-2,546	-3,095	-3,657	-2,046	-14,874
Incentives for investment in infrastructure:													
Provide America Fast Forward Bonds (AFFB) and expand eligible uses:													
Provide AFFB and expand eligible uses 3/	0	0	0	0	1	-1	0	0	1	0	0	0	1
Allow eligible use of AFFB to include financing all qualified private activity bond program categories 3/	0	-1	-4	-10	-15	-20	-26	-32	-38	-44	-48	-50	-238
Subtotal, provide AFFB and expand eligible uses	0	-1	-4	-10	-14	-21	-26	-32	-37	-44	-48	-50	-237
Allow current refundings of State and local governmental bonds	0	-1	-5	-5	-5	-5	-5	-5	-5	-5	-5	-21	-46
Repeal the \$150 million non-hospital bond limitation on qualified section 501(c)(3) bonds	0	0	-1	-3	-5	-7	-9	-11	-13	-16	-17	-16	-82
Increase national limitation amount for qualified highway or surface freight transfer facility bonds	-6	-28	-60	-93	-125	-153	-167	-163	-136	-96	-55	-459	-1,076
Provide a new category of qualified private activity bonds for infrastructure projects referred to as "Qualified Public Infrastructure Bonds"	0	-27	-121	-258	-397	-534	-646	-698	-714	-728	-741	-1,337	-4,864
Modify qualified private activity bonds for public educational facilities													Negligible revenue effect
Modify treatment of banks investing in tax-exempt bonds	0	-5	-38	-131	-225	-317	-405	-493	-574	-630	-616	-716	-3,434
Repeal tax-exempt bond financing of professional sports facilities	0	3	11	23	35	47	60	72	85	97	109	119	542
Allow more flexible research arrangements for purposes of private business use limits	0	0	0	0	-1	-1	-1	-3	-3	-3	-4	-2	-16
Modify tax-exempt bonds for Indian tribal governments	0	-4	-12	-12	-12	-12	-12	-12	-12	-12	-12	-52	-112
Subtotal, incentives for investment in infrastructure	-6	-63	-230	-489	-749	-1,003	-1,211	-1,345	-1,409	-1,437	-1,389	-2,534	-9,325

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2017-21	2017-26
Eliminate fossil fuel tax preferences:													
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<i>Repeal the enhanced oil recovery credit for eligible costs attributable to a qualified enhanced oil recovery project</i>	0	235	559	792	979	1,070	1,049	1,011	1,010	1,038	1,060	3,635	8,803
<i>Repeal the credit for oil and gas produced from marginal wells 4/</i>	0	0	0	0	0	0	0	0	0	0	0	0	0
<i>Repeal the expensing of intangible drilling costs</i>	0	966	1,541	1,439	1,645	1,526	1,100	733	472	340	288	7,117	10,050
<i>Repeal the deduction for costs paid or incurred for any tertiary injectant used as part of a tertiary recovery method</i>	0	5	8	8	8	8	8	8	8	8	8	37	77
<i>Repeal the exception to passive loss limitations provided to working interests in oil and natural gas properties</i>	0	9	12	12	12	11	10	10	9	9	9	56	103
<i>Repeal the use of percentage depletion with respect to oil and gas wells</i> ..	0	483	770	725	666	589	509	429	350	270	199	3,233	4,990
<i>Repeal the ability to claim the domestic manufacturing deduction against income derived from the production of oil and gas</i>	0	470	836	869	901	932	962	993	1,026	1,062	1,098	4,008	9,149
<i>Repeal two-year amortization of independent producers' geological and geophysical expenditures, instead allowing amortization over the seven-year period used by integrated oil and gas producers</i>	0	54	197	307	296	235	170	103	58	47	48	1,089	1,515
<i>Repeal expensing of exploration and development costs</i>	0	20	35	35	33	32	30	27	25	24	24	155	285
<i>Repeal percentage depletion for hard mineral fossil fuels</i>	0	113	183	177	145	114	99	87	75	66	62	732	1,121
<i>Repeal capital gains treatment for royalties</i>	0	26	52	52	52	52	52	52	52	52	52	234	494
<i>Repeal the ability to claim the domestic manufacturing deduction against income derived from the production of coal and other hard mineral fossil fuels</i>	0	11	20	21	22	23	24	25	26	27	28	97	227
<i>Repeal the exemption from the corporate income tax for publicly traded partnerships with qualifying income and gains from activities relating to fossil fuels</i>	0	0	0	0	0	0	201	280	295	309	323	0	1,408
Subtotal, eliminate fossil fuel tax preferences	0	2,392	4,213	4,437	4,759	4,592	4,214	3,758	3,406	3,252	3,199	20,393	38,222
Subtotal, eliminate fossil fuel tax preferences	0	2,392	4,213	4,437	4,759	4,592	4,214	3,758	3,406	3,252	3,199	20,393	38,222
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	3,674	5,415	4,347	2,743	1,665	1,124	679	466	434	405	17,844	20,952
Modify rules that apply to sales of life insurance contracts	0	26	44	46	48	50	54	56	58	61	63	214	506
Modify proration rules for life insurance company general and separate accounts	0	345	527	534	551	579	609	628	642	658	681	2,536	5,754
Expand pro rata interest expense disallowance for corporate-owned life insurance	0	116	232	337	457	597	753	910	1,075	1,245	1,422	1,739	7,144
Conform net operating loss rules of life insurance companies to those of other corporations	0	18	28	30	31	33	35	36	38	39	41	140	329
Subtotal, reform the treatment of financial and insurance industry products	0	4,179	6,246	5,294	3,830	2,924	2,575	2,309	2,279	2,437	2,612	22,473	34,685
Other business revenue changes and loophole closers:													
Repeal last-in, first-out method of accounting for inventories	0	5,369	7,647	8,307	8,394	8,611	8,082	8,032	8,455	9,475	8,963	38,328	81,335
Repeal lower-of-cost-or-market inventory accounting method	0	878	1,321	1,381	1,390	521	240	250	260	271	283	5,491	6,795
Modify like-kind exchange rules	0	2,684	7,828	6,889	5,903	4,870	3,986	3,668	3,748	3,831	3,916	28,174	47,323
Modify depreciation rules for purchases of general aviation passenger aircraft	0	48	159	260	345	460	511	434	346	286	208	1,272	3,057
Expand the definition of substantial built-in loss for purposes of partnership loss transfers	0	7	8	8	8	9	9	10	10	10	10	40	89
Extend partnership basis limitation rules to nondeductible expenditures	0	89	122	126	129	132	134	136	139	141	144	598	1,292
Deny deduction for punitive damages	0	48	70	72	73	76	77	79	80	82	84	339	741
Conform corporate ownership standards	0	1	16	31	32	33	34	35	36	38	40	113	296
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>													Negligible revenue effect
<i>Prevent use of leveraged distributions from related corporations to avoid dividend treatment</i>	0	14	23	24	25	26	27	28	30	31	32	112	260

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<i>Treat purchases of hook stock by a subsidiary as giving rise to deemed distributions</i>	0	3	5	6	6	6	6	7	7	7	7	26	60
<i>Repeal gain limitation for dividends received in reorganization exchanges</i> .	0	31	54	57	60	63	66	69	72	76	80	265	628
Subtotal, tax corporate distributions as dividends	0	48	82	87	91	95	99	104	109	114	119	403	948
Repeal Federal Insurance Contributions Act tip credit	0	729	883	921	961	1,004	1,047	1,092	1,140	1,189	1,241	4,498	10,207
Repeal the excise tax credit for distilled spirits with flavor and wine additives .	0	82	109	109	109	109	109	109	109	109	109	518	1,063
Subtotal, other business revenue changes and loophole closers .	0	9,983	18,245	18,191	17,435	15,920	14,328	13,949	14,432	15,546	15,117	79,774	153,146
Subtotal, elements of business tax reform	-17	33,438	61,418	59,832	55,925	54,543	54,969	56,357	56,225	57,647	58,959	265,156	549,313
Transition to a reformed business tax system:													
Impose a 14-percent one-time tax on previously untaxed foreign income	0	35,930	59,883	59,883	59,883	59,883	23,953	0	0	0	0	275,462	299,415
OTHER REVENUE PROPOSALS													
Middle-class and pro-work tax reforms:													
Reform child care tax incentives 3/	0	-684	-3,539	-3,720	-3,909	-4,081	-4,277	-4,459	-4,652	-5,009	-5,492	-15,933	-39,822
Simplify and better target tax benefits for education:													
<i>Expand and modify the American Opportunity Tax Credit and repeal the Lifetime Learning Credit 3/</i>													
	0	15	-2,524	-2,623	-2,623	-3,192	-3,552	-4,113	-4,490	-5,015	-5,018	-10,947	-33,135
<i>Make Pell Grants excludable from income 3/</i>	0	-29	-1,995	-2,029	-1,956	-1,924	-1,955	-1,917	-1,968	-1,940	-1,890	-7,933	-17,603
<i>Modify reporting of scholarships on Form 1098-T 3/</i>	0	1	19	48	37	37	39	40	42	44	46	142	353
<i>Repeal the student loan interest deduction and provide exclusion for certain debt relief and scholarships 3/</i>	0	-6	-18	-18	-19	-10	93	212	326	446	590	-71	1,596
Subtotal, simplify and better target tax benefits for education	0	-19	-4,518	-4,622	-4,561	-5,089	-5,375	-5,778	-6,090	-6,465	-6,272	-18,809	-48,789
Expand the EITC for workers without qualifying children 3/	0	-468	-6,255	-6,387	-6,495	-6,628	-6,756	-6,894	-7,028	-7,176	-7,322	-26,233	-61,409
Simplify the rules for claiming the EITC for workers without qualifying children 3/	0	-41	-550	-540	-547	-560	-572	-587	-601	-615	-629	-2,238	-5,242
Provide a second-earner tax credit 3/	0	-2,037	-8,926	-9,065	-9,160	-9,281	-9,429	-9,563	-9,703	-9,841	-10,016	-38,469	-87,021
Extend exclusion from income for cancellation of certain home mortgage debt	0	-2,467	-822	0	0	0	0	0	0	0	0	-3,289	-3,289
Subtotal, middle-class and pro-work tax reforms	0	-5,716	-24,610	-24,334	-24,672	-25,639	-26,409	-27,281	-28,074	-29,106	-29,731	-104,971	-245,572
Reforms to retirement and health benefit plans:													
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	-959	-1,556	-1,672	-1,722	-1,779	-1,885	-1,989	-2,119	-2,221	-5,909	-15,902
Expand penalty-free withdrawals for long-term unemployed	0	-226	-231	-235	-240	-245	-250	-255	-260	-265	-270	-1,177	-2,477
Require retirement plans to allow long-term part-time workers to participate ..	0	-46	-47	-49	-50	-51	-52	-53	-55	-56	-57	-243	-516
Facilitate annuity portability													
Simplify minimum required distribution rules	0	-5	-6	-2	4	19	37	61	91	127	172	10	498
Allow all inherited plan and IRA balances to be rolled over within 60 days													
Permit unaffiliated employers to maintain a single multiple-employer defined contribution plan	0	-97	-137	-147	-155	-169	-181	-196	-209	-230	-246	-705	-1,767
Improve the excise tax on high cost employer-sponsored health coverage	0	0	0	0	-66	-112	-138	-172	-209	-254	-314	-178	-1,265
Subtotal, reforms to retirement and health benefit plans	0	-374	-1,380	-1,989	-2,179	-2,280	-2,363	-2,500	-2,631	-2,797	-2,936	-8,202	-21,429
Reforms to capital gains taxation, upper-income tax benefits, and the taxation of financial institutions:													
Reduce the value of certain tax expenditures	0	31,092	50,403	54,946	59,515	63,910	68,322	72,776	77,183	81,525	85,866	259,866	645,538
Reform the taxation of capital income	0	14,757	24,669	20,639	22,015	23,211	23,426	24,696	25,976	27,254	28,565	105,291	235,208
Implement the Buffett Rule by imposing a new "Fair Share Tax"	0	7,848	-62	1,317	3,102	4,035	4,136	4,170	4,240	4,334	4,388	16,240	37,508
Impose a financial fee	0	5,653	11,084	10,949	11,163	11,420	11,683	11,952	12,226	12,508	12,795	50,269	111,433
Subtotal, reforms to capital gains taxation, upper-income tax benefits, and the taxation of financial institutions	0	59,350	86,094	87,851	95,795	102,576	107,567	113,594	119,625	125,621	131,614	431,666	1,029,687

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2017-21	2017-26
Loophole closers:													
Require current inclusion in income of accrued market discount and limit the accrual amount for distressed debt	0	4	12	20	28	34	42	50	58	69	79	98	396
Require that the cost basis of stock that is a covered security must be determined using an average cost basis method	0	0	74	223	377	539	634	657	684	713	744	1,213	4,645
Tax carried (profits) interests as ordinary income	0	2,619	2,633	2,520	2,420	2,351	1,932	1,472	1,213	1,121	1,029	12,543	19,310
Require non-spouse beneficiaries of deceased IRA owners and retirement plan participants to take inherited distributions over no more than five years	0	111	285	471	660	853	891	841	780	718	654	2,380	6,264
Limit the total accrual of tax-favored retirement benefits	0	1,616	2,302	2,406	2,639	2,947	3,084	3,465	3,606	3,828	4,085	11,910	29,978
Rationalize net investment income and Self-Employment Contributions Act taxes	0	16,660	23,276	24,773	25,913	26,943	28,124	29,421	30,816	32,163	33,570	117,565	271,659
Limit Roth conversions to pre-tax dollars	0	0	5	10	16	20	20	21	28	32	99	51	251
Eliminate deduction for dividends on stock of publicly-traded corporations held in employee stock ownership plans	0	702	945	962	978	995	1,011	1,028	1,044	1,062	1,079	4,582	9,806
Repeal exclusion of net unrealized appreciation in employer securities	0	16	27	28	13	4	4	-12	-23	-23	-24	88	10
Disallow the deduction for charitable contributions that are a prerequisite for purchasing tickets to college sporting events	0	<u>150</u>	<u>237</u>	<u>255</u>	<u>272</u>	<u>290</u>	<u>308</u>	<u>327</u>	<u>348</u>	<u>369</u>	<u>391</u>	<u>1,204</u>	<u>2,947</u>
Subtotal, loophole closers	0	21,878	29,796	31,668	33,316	34,976	36,050	37,270	38,554	40,052	41,706	151,634	345,266
Modify estate and gift tax provisions:													
Restore the estate, gift, and generation-skipping transfer (GST) tax parameters in effect in 2009	0	0	15,717	17,102	18,415	20,027	21,695	23,660	25,815	28,303	31,020	71,261	201,754
Expand requirement of consistency in value for transfer and income tax purposes	0	0	142	143	169	174	185	198	211	228	243	628	1,693
Modify transfer tax rules for grantor retained annuity trusts and other grantor trusts	0	0	1,123	1,241	1,478	1,622	1,969	2,374	2,743	3,194	3,405	5,464	19,149
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	24	25	26	27	28	29	31	34	36	102	260
Modify GST tax treatment of Health and Education Exclusion Trusts	0	0	-35	-33	-30	-29	-27	-26	-24	-23	-20	-127	-247
Simplify gift tax exclusion for annual gifts	0	0	84	160	259	336	413	453	548	657	770	839	3,680
Expand applicability of definition of executor					Negligible revenue effect								
Subtotal, modify estate and gift tax provisions	0	0	17,055	18,638	20,317	22,157	24,263	26,688	29,324	32,393	35,454	78,167	226,289
Other revenue raisers:													
Impose an oil fee	0	7,221	14,439	21,505	28,450	35,135	41,377	41,989	42,521	42,977	43,456	106,750	319,070
Increase and modify Oil Spill Liability Trust Fund financing	0	94	133	135	138	138	139	141	143	144	147	638	1,352
Reinstate Superfund taxes:													
<i>Reinstate and extend Superfund excise taxes</i>	<i>0</i>	<i>920</i>	<i>1,175</i>	<i>1,242</i>	<i>1,273</i>	<i>1,340</i>	<i>1,354</i>	<i>1,402</i>	<i>1,436</i>	<i>1,473</i>	<i>1,507</i>	<i>5,950</i>	<i>13,122</i>
<i>Reinstate Superfund environmental income tax</i>	<i>0</i>	<i>676</i>	<i>912</i>	<i>921</i>	<i>929</i>	<i>936</i>	<i>946</i>	<i>957</i>	<i>963</i>	<i>972</i>	<i>985</i>	<i>4,374</i>	<i>9,197</i>
Subtotal, reinstate Superfund taxes	0	1,596	2,087	2,163	2,202	2,276	2,300	2,359	2,399	2,445	2,492	10,324	22,319
Increase tobacco taxes and index for inflation	0	9,982	12,910	12,715	12,719	12,329	11,880	11,436	10,877	10,399	9,902	60,655	115,149
Make unemployment insurance surtax permanent	0	1,172	1,604	1,624	1,645	1,667	1,690	1,712	1,737	1,762	1,789	7,712	16,402
Expand Federal Unemployment Tax Act (FUTA) base and reform FUTA credit reduction rules	0	0	3,128	3,185	3,923	4,303	5,424	6,802	6,068	6,346	7,113	14,539	46,292
Subtotal, other revenue raisers	0	20,065	34,301	41,327	49,077	55,848	62,810	64,439	63,745	64,073	64,899	200,618	520,584
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>15</i>	<i>35</i>	<i>59</i>	<i>81</i>	<i>84</i>	<i>88</i>	<i>92</i>	<i>96</i>	<i>101</i>	<i>105</i>	<i>274</i>	<i>756</i>
<i>Require information reporting for private separate accounts of life insurance companies</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>1</i>	<i>4</i>	<i>9</i>
Subtotal, improve information reporting for certain businesses and contractors	0	15	36	60	82	85	89	93	97	102	106	278	765

**REVENUE ESTIMATES OF THE
ADMINISTRATION'S FISCAL YEAR 2017 REVENUE PROPOSALS 1/ 2/ -- continued**
(fiscal years, in millions of dollars)

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2017-21	2017-26
Provide an exception to the limitation on disclosing tax return information to expand TIN matching beyond forms where payments are subject to backup withholding													
Provide for reciprocal reporting of information in connection with the implementation of the Foreign Account Tax Compliance Act													
Require Form W-2 reporting for employer contributions to defined contribution plans													
Subtotal, expand information reporting	0	15	36	60	82	85	89	93	97	102	106	278	765
Improve compliance by businesses:													
Increase certainty with respect to worker classification	5	93	451	871	1,038	1,127	1,220	1,321	1,428	1,544	1,668	3,580	10,761
Increase information sharing to administer excise taxes	0	4	9	13	14	16	17	17	18	18	19	56	145
Provide authority to readily share information about beneficial ownership information of U.S. companies with law enforcement	0	0	1	2	9	6	4	3	3	3	3	18	34
Subtotal, improve compliance by businesses	5	97	461	886	1,061	1,149	1,241	1,341	1,449	1,565	1,690	3,654	10,940
Strengthen tax administration:													
Modify the conservation easement deduction and pilot a conservation credit:													
Reform the deduction for donations of conservation easements	0	4	13	20	21	21	23	24	25	26	28	79	205
Eliminate the deduction for contributions of conservation easements on golf courses	0	5	21	38	50	56	60	62	66	69	73	170	500
Restrict deductions and harmonize the rules for contributions of conservation easements for historic preservation	0	2	7	13	17	20	21	22	23	24	25	59	174
Pilot an allocable credit for conservation contributions and report to Congress	0	-5	-19	-25	-25	-25	-25	-25	-25	-25	-25	-99	-224
Subtotal, modify the conservation easement deduction and pilot a conservation credit	0	6	22	46	63	72	79	83	89	94	101	209	655
Impose liability on shareholders to collect unpaid income taxes of applicable corporations	0	395	423	442	461	481	502	524	546	570	595	2,202	4,939
Implement a program integrity statutory cap adjustment for tax administration	0	278	1,585	3,263	5,008	6,763	8,327	9,264	9,590	9,737	9,814	16,897	63,629
Revise offer-in-compromise application rules	0	1	2	2	2	2	2	2	2	2	2	9	19
Make repeated willful failure to file a tax return a felony	0	0	0	0	1	1	1	1	2	2	2	2	10
Facilitate tax compliance with local jurisdictions	0	1	1	1	2	2	2	2	2	2	2	7	17
Improve investigative disclosure statute	0	0	0	0	1	1	1	1	2	2	2	2	10
Allow the IRS to absorb credit and debit card processing fees for certain tax payments	0	2	2	2	2	2	2	2	2	2	2	10	20
Provide the IRS with greater flexibility to address correctable errors 3/	0	31	62	62	63	65	66	68	70	72	74	283	633
Enhance electronic filing of returns	0	0	0	0	1	1	1	1	2	2	2	2	10
Improve the whistleblower program													
Index all civil tax penalties for inflation													
Combat tax-related identity theft													
Allow States to send notices of intent to offset Federal tax refunds to collect State tax obligations by regular first-class mail instead of certified mail													
Accelerate information return filing due dates 3/	0	3	5	11	12	12	13	13	13	13	14	43	109
Increase oversight of paid tax return preparers 3/	0	14	31	34	37	41	45	49	54	57	62	157	424
Enhance administrability of the appraiser penalty													
Subtotal, strengthen tax administration	0	731	2,133	3,863	5,653	7,443	9,041	10,010	10,374	10,555	10,672	19,823	70,475
Subtotal, reduce the tax gap and make reforms	5	843	2,630	4,809	6,796	8,677	10,371	11,444	11,920	12,222	12,468	23,755	82,180
Simplify the tax system:													
Modify adoption credit to allow tribal determination of special needs	0	0	0	0	-1	-1	-1	-1	-1	-1	-1	-2	-7
Repeal non-qualified preferred stock designation	0	33	55	55	53	50	46	41	36	32	29	246	430
Reform excise tax based on investment income of private foundations	0	-5	-5	-6	-6	-6	-6	-6	-7	-7	-7	-28	-61

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2017-21	2017-26
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 activity limits on governmental bonds	0	0	-1	-3	-5	-7	-9	-11	-13	-15	-17	-16	-81
Repeal technical terminations of partnerships	0	13	19	21	23	25	27	29	30	32	33	101	252
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	-368	-327	-287	-248	-209	-170	-132	-94	-57	-44	-1,439	-1,936
Increase the standard mileage rate for automobile use by volunteers	0	-20	-62	-65	-68	-69	-71	-72	-74	-76	-79	-284	-656
Consolidate contribution limitations for charitable deductions and extend the carryforward period for excess charitable contribution deduction amounts	0	0	-93	-51	-6	-6	-6	-491	-1,188	-1,830	-2,416	-156	-6,087
Exclude from gross income subsidies from public utilities for purchase of water runoff management													
Provide relief for certain accidental dual citizens	0	-63	-108	-58	-23	-25	-26	-28	-29	-30	-32	-277	-422
Subtotal, simplify the tax system	0	-434	-624	-605	-585	-621	-634	-1,107	-1,793	-2,418	-3,010	-2,869	-11,831
User fee:													
Reform inland waterways funding	0	3	78	118	156	156	156	156	156	155	155	511	1,289
Subtotal, user fee	0	3	78	118	156	156	156	156	156	155	155	511	1,289
Other initiatives:													
Allow offset of Federal income tax refunds to collect delinquent State income taxes for out-of-state residents													
Improve disclosure for child support enforcement													
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
Subtotal, other revenue proposals	5	95,615	143,340	157,483	178,021	195,850	211,811	222,703	230,826	240,195	250,619	770,309	1,926,463
Total, Administration's Fiscal Year 2017 Revenue Proposals	-12	164,983	264,641	277,198	293,829	310,276	290,733	279,060	287,051	297,842	309,578	1,310,927	2,775,191
Total, receipt effect	-12	165,645	278,240	292,772	311,257	330,088	313,269	303,831	314,771	327,996	341,889	1,378,002	2,979,758
Total, outlay effect	0	662	13,599	15,574	17,428	19,812	22,536	24,771	27,220	30,154	32,311	67,075	204,567

Department of the Treasury

Notes:

1/ Presentation in this table does not reflect the order in which these proposals were estimated. The date of enactment of the proposals is assumed to be July 15, 2016.

2/ Table 12-2 in the Analytical Perspectives of the FY 2017 Budget includes the effects of a number of proposals that are not reflected here. These proposals would: enact changes to the military retirement reform enacted in the FY 2016 National Defense Authorization Act, extend the Children's Health Insurance Program through 2019, create State option to provide 12-month continuous Medicaid eligibility for adults, standardize definition of American Indian and Alaska Native in the Affordable Care Act, modernize the unemployment insurance (UI) program, create a mandatory reemployment services eligibility assessment (RESEA) program, levy a fee on the production of hardrock minerals to restore abandoned mines, return fees on the production of coal to pre-2006 levels to restore abandoned mines, enhance UI program integrity, request a program integrity cap adjustment for the RESEA program, reauthorize special assessment on domestic nuclear utilities, establish user fee for Electronic Visa Update System, enact the Trans-Pacific Partnership Trade Agreement, 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.

Expand and simplify the tax credit provided to qualified small employers for non-elective contributions to employee health insurance	0	21	23	19	17	12	14	10	7	4	2	92	129
Designate Promise Zones	0	27	29	29	31	31	33	35	37	37	39	147	328
Modify and permanently extend renewable electricity production tax credit and investment tax credit	0	58	155	281	453	695	973	1,300	1,695	2,117	2,629	1,642	10,356
Provide a carbon dioxide investment and sequestration tax credit	0	0	0	0	0	142	280	123	338	226	0	142	1,109
Provide AFFB and expand eligible uses	0	239	1,085	2,328	3,635	5,002	6,407	7,836	9,282	10,743	12,217	12,289	58,774
Allow eligible uses of AFFB to include financing all qualified private activity bond program categories	0	49	221	475	742	1,020	1,307	1,599	1,894	2,192	2,492	2,507	11,991
Reform child care tax incentives	0	0	962	1,009	1,051	1,091	1,147	1,182	1,227	1,264	1,268	4,113	10,201

**REVENUE ESTIMATES OF THE
ADMINISTRATION'S FISCAL YEAR 2017 REVENUE PROPOSALS 1/ 2/ -- continued**
(fiscal years, in millions of dollars)

	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2017-21	2017-26
Expand and modify the AOTC and repeal the Lifetime Learning Credit	0	0	2,682	2,813	2,817	3,015	3,389	3,608	3,980	4,207	4,231	11,327	30,742
Make Pell Grants excludable from income	0	0	1,705	1,747	1,689	1,675	1,726	1,692	1,753	1,731	1,679	6,816	15,397
Modify reporting of tuition expenses and scholarships on Form 1098-T	0	0	-10	-39	-27	-27	-29	-30	-32	-33	-35	-103	-262
Repeal the student loan interest deduction and provide exclusion for certain debt relief and scholarships	0	0	0	0	0	0	-7	-15	-22	-35	-42	0	-121
Expand the EITC for workers without qualifying children	0	273	5,468	5,577	5,677	5,796	5,906	6,020	6,134	6,262	6,383	22,791	53,496
Simplify the rules for claiming the EITC for workers without qualifying children	0	24	484	475	481	492	503	516	528	541	553	1,956	4,597
Provide a second-earner tax credit	0	0	739	735	735	740	754	758	760	759	754	2,949	6,734
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	126	198	203	207	215	222	228	230	236	734	1,865
Provide the IRS with greater flexibility to address correctable errors	0	-26	-53	-52	-53	-54	-55	-56	-58	-59	-61	-238	-527
Accelerate information return filing due dates	0	-1	-3	-6	-7	-7	-8	-8	-8	-8	-8	-24	-64
Increase oversight of paid tax return preparers	<u>0</u>	<u>-2</u>	<u>-14</u>	<u>-15</u>	<u>-16</u>	<u>-18</u>	<u>-19</u>	<u>-21</u>	<u>-23</u>	<u>-24</u>	<u>-26</u>	<u>-65</u>	<u>-178</u>
Total, outlay effect	0	662	13,599	15,574	17,428	19,812	22,536	24,771	27,720	30,154	32,311	67,075	204,567

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