#21-2 093 VERY PRELIMINARY 20-Dec-21

ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS OF TITLE XII - COMMITTEE ON FINANCE, OF H.R. 5376, THE "BUILD BACK BETTER ACT"

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													
1. Increases in State allocations	cyba 12/31/21	-2	-15	-46	-60	-223	-315	-359	-368	-370	-370	-346	-2,129
2. Tax-exempt bond financing requirement (sunset 12/31/26)	[1]	-58	-214	-472	-731	-1,045	-1,081	-1,223	-1,281	-1,293	-1,295	-2,521	-8,695
3. Buildings designed to serve extremely low-income													
households	[2]	-6	-31	-75	-124	-177	-217	-261	-301	-341	-393	-413	-1,925
4. Repeal of qualified contract option	DOE	2	8	18	28	41	51	61	73	84	102	97	468
5. Modification and clarification of rights relating to													
building purchase	[3]	2	8	21	34	49	62	75	89	104	125	113	567
Total of Part 1 - Low Income Housing Credit		-63	-244	-554	-853	-1,356	-1,501	-1,706	-1,789	-1,816	-1,832	-3,069	-11,713
Part 2 - Neighborhood Homes Investment Act (sunset 12/31/25)	tyba 12/31/21	-192	-481	-1,061	-1,170	-1,177	-1,086	-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
2. New markets tax credit for Tribal Statistical Areas	cya 12/31/21		[4]	-2	-6	-13	-21	-29	-34	-37	-36	-22	-178
3. Inclusion of Indian areas as difficult development	·												
areas for purposes of certain buildings	bpisa 12/31/21	[4]	-2	-5	-8	-11	-13	-16	-19	-21	-24	-26	-119
Total of Part 3 - Investments in Tribal Infrastructure		[4]	-3	-10	-18	-30	-42	-55	-65	-73	-77	-62	-374
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	to be Prov	ided by the	Congressi	onal Budge	t Office			
3. Exclusion of amounts received from State-based	[-]									- 55			
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 AN	JD												
COMMUNITY DEVELOPMENT		-669	-1,591	-2,573	-3,068	-3,666	-3,812	-3,498	-3,336	-3,217	-3,282	-11,570	-28,714

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE F - GREEN ENERGY													
Part 1 - Renewable Electricity and Reducing Carbon Emissions													
Extension and modification of credit for electricity													
produced from certain renewable resources (sunset	fpisa 12/31/21 &												
12/31/26) [7]	ftcowba 12/31/21	-342	-1,119	-2,042	-3,103	-4,510	-6,019	-7,710	-9,580	-10,778	-11,305	-11,117	-56,509
2. Extension and modification of energy credit (sunset	generally												
12/31/26) [7]	ppisa 12/31/21	-792	-1,421	-1,613	-2,735	-6,123	-7,778	-7,809	-8,022	-8,433	-8,885	-12,684	-53,610
3. Increase in energy credit for solar facilities placed in servic	e												
in connection with low-income communities (sunset													
12/31/26)	1/1/22 -					Estimate	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 -				Estim	ate Include	d in Items .	F.1.1. throi	igh F.1.3. A	1bove			
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	•	-148	-126	-137	-144	-99	-50	-56	-64	-72	-80	-654	-975
8. Zero-emission nuclear power production credit	epasa 12/31/21												
(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 E	missions	-5,691	-5,679	-7,321	-10,721	-16,105	-19,119	-18,287	-19,828	-21,871	-22,855	-45,517	-147,476
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 12/31/31)	fsoua 12/31/22		-10	-25	-40	-49	-22					-124	-147
4. Credit for production of clean hydrogen [7]	[8]	-70	-215	-421	-708	-1,062	-1,401	-1,730	-2,100	-2,254	-2,266	-2,476	-12,227
Total of Part 2 - Renewable Fuels		-229	-2,932	-4,187	-4,572	-4,951	-2,462	-1,730	-2,100	-2,254	-2,266	-16,872	-27,685
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 &												
12/31/31)	apoia 12/31/21	-346	-2,243	-1,878	-1,860	-1,890	-1,877	-1,830	-1,860	-1,877	-1,894	-8,217	-17,554
2. Extension and modification of residential energy efficient	1			ŕ	ŕ	ŕ	ŕ	,			ŕ	ŕ	ŕ
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 &												
(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													
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													
subsidies	ara 12/31/18	-6	-2	-2	-3	-4	-5	-6	-6	-7	-7	-17	-48
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 Ind	lividuals	-560	-3,092	-3,455	-5,250	-5,390	-5,487	-5,551	-5,678	-5,764	-5,872	-17,746	-46,095

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
Part 4 - Greening the Fleet and Alternative Vehicles													
1 1 8	vaa 12/31/21 &												
vehicle credit for individuals (sunset 12/31/31) [7]	vaa 12/31/22	-179	-826	-576	-709	-832	-1,001	-1,171	-1,304	-1,447	-1,559	-3,123	-9,606
2. Credit for previously-owned qualified plug-in electric drive													
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
	ppisa 12/31/21	-4	-7	-8	-9	-11	-4					-40	-44
5. Alternative fuel refueling property credit (sunset													
· · · · · · · · · · · · · · · · · · ·	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	1 10/01/01	• •						4.0	4.0		4.0	400	404
, ,,,	tyba 12/31/21	-20	-21	-23	-24	-16	-16	-18	-18	-19	-19	-103	-194
7. Credit for certain new electric bicycles (sunset 12/31/25) ppis	sa 12/21/21 ityeasd	-254	-683	-889	-1,157	-1,126	-8	-7	-6	-6	-4	-4,108	-4,139
Total of Part 4 - Greening the Fleet and Alternative Vehicles		-662	-2,216	-2,311	-2,875	-3,138	-2,394	-2,771	-3,106	-3,459	-3,792	-11,202	-26,724
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) apoi	ia 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	-224	-353	-366	-390	-422	-444	-458	-396	-289	-172	-1,755	-3,515
Total of Part 5 - Investment in the Green Workforce		-3,572	-5,857	-5,420	-5,118	-2,944	-1,389	-1,188	-919	-633	-258	-22,913	-27,301
Part 6 - Qualified Environmental Justice Credit (sunset													
12/31/31) [7][10]	1/1/22		-529	-846	-952	-1,005	-1,057	-1,057	-1,057	-1,057	-1,057	-3,331	-8,618
Part 7 - Reinstatement of Superfund	7/1/22	290	1,229	1,280	1,323	1,357	1,390	1,424	1,459	1,494	1,530	5,479	12,776
Part 8 - Incentives for Clean Electricity and Clean Transportation													
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													
communities	1/1/27					- Estimate	Included is	n Item F.8.	2. Above				
4. Cost recovery for qualified facilities, qualified property, and													
e, c	appisa 12/31/26						-26	-83	-134	-171	-211		-624
5. Clean fuel production credit [7]	tfpa 12/31/26						-1,513	-2,130	-2,229	-2,346	-1,616		-9,834
Total of Part 8 - Incentives for Clean Electricity and Clean Transpor	rtation						-2,262	-3,314	-11,684	-17,522	-18,904		-53,685
TOTAL OF SUBTITLE F - GREEN ENERGY		-10,424	-19,076	-22,261	-28,164	-32,176	-32,780	-32,473	-42,913	-51,066	-53,474	-112,102	-324,808

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]	t	-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
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 1. Improve affordability and reduce premium costs of health insurance for consumers (sunset 12/31/25)	tyba 12/31/21 tyba 12/31/21 tyba 12/31/21 tyba 12/31/21 tyba 12/31/21 tyba 12/31/21 tyba 12/31/22	-8	-18	-19	Estimate Estimate Estimate Estimate - 20	e to be Prov	ided by the ided by the ided by the ided by the -44	Congression Congression Congression Congression -47	onal Budge onal Budge onal Budge onal Budge -49	t Office t Office t Office t Office52	-56	-96	
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 1. 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

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
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 - Compromise on Deduction for State and Local Taxes	tyba 12/31/20					- Proposal	Requires F	urther Spe	cification				
TOTAL OF SUBTITLE G - SOCIAL SAFETY NET		-102,018	-41,939	-12,616	-12,175	-13,218	-4,069	-4,188	-4,420	-4,726	-5,050	-181,965	-204,420
SUBTITLE H - RESPONSIBLY FUNDING OUR PRIORITIES													
Part 1 - Corporate and International Tax Reforms													
A. Corporate Provisions													
Corporate alternative minimum tax	tyba 12/31/22	4,805	53,747	46,526	30,204	22,133	20,190	23,327	28,007	32,644	35,998	157,415	297,581
2. 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		1,278	2,628	2,763	2,737	2,669	2,758	2,859	2,890	2,885	9,406	23,467
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													
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 certai			ŕ	ŕ								•	ŕ
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	[16]	-18	741	1,708	2,098	2,096	1,688	1,299	1.059	944	1,159	6,624	12,773
5. Foreign oil and gas extraction income and foreign oil	,			,	,	,	,	,	,		,	- ,-	,
related income to include oil shale and tar sands	tyba 12/31/21					- Estimate	Included in	Item H.1.0	C.6. Below				
6. Modifications to inclusion of global intangible	J												
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	[-/]	100	1,275	.,	0,170	2,,,,	2,070	0,057	0,022	0,020	,,0,1	17,057	20,500
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. Modifications related to deduction for foreign source portion			1,511	3,133	3,230	3,037	3,022	5,171	3,330	3,371	3,233	10,570	27,171
of dividends and controlled foreign corporations status		7	15	15	16	16	17	17	18	18	19	69	158
Limitation on foreign base company sales and	[17]	,	13	13	10	10	1,	1,	10	10	17	0)	130
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]		014	1,/34	1,713	1,554	1,177	1,102	1,170	1,232	1,207	0,023	12,041
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	tyba 12/31/21	-1,033	-2,331	1,527	1,233	7,200	7,712	10,171	10,576	11,177	11,704	13,636	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
2. Modifications to treatment of certain	lai tyba 12/31/21 &	00	100	200	234	200	200	314	340	360	710	913	2,720
	lo/a DOE	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
Adjusted basis initiation for divisive reorganization Modifications to exemption for portfolio interest	oia DOE	576	876	405	1,917	25	20	2,006	13	2,009	2,103	2,000	2,067
Modifications to exemption for portion interest Certain partnership interest derivatives	pma 12/31/22	376 4	8/6	403 9	9	23 9	10	10	10	10	8 10	2,000 41	2,067 90
Certain partnership interest derivatives Adjustments to earnings and profits of controlled	рша 12/31/22	4	9	9	9	9	10	10	10	10	10	41	90
foreign corporations	[21]	150	325	375	425	475	525	575	625	675	725	1.750	4,875
toreign corporations	[21]	150	323	3/3	423	4/3	323	313	023	0/3	123	1,/30	4,073

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
7. Certain dividends from controlled foreign corporations to													
United States shareholders treated as extraordinary													
dividends	[22]					- Estimate	Included in	n Item H.1.	C.4. Above				
8. 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
9. Constructive sales	generally csa DOE							1 Item H.1.1					46000
10. 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
11. 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
12. Research and experimental expenditures	DOE	20.001	20.956	22 161	24 122	10 204	20,000	20.059	10.052	0.260	1 051	105.056	4.016
(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
inverted corporations	tyba 12/31/21	50	96	113	156	202	252	279	242	201	198	618	1,790
inverted corporations	tyba 12/31/21	30	90	113	130	202	232		242	201		010	1,790
Total of Part 1 - Corporate and International Tax Reforms	•••••	-11,837	51,771	72,770	71,217	100,823	108,249	104,806	100,284	95,454	96,888	284,746	790,430
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	Item H.3.A	1.2. Below -				
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 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	10/01/01							2	_	2	2	-	1.2
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 F	Plans	. 73	153	179	196	213	229	241	3,522	3,038	2,242	815	10,087
Part 4 - Funding the Internal Revenue Service and Improving													
Taxpayer Compliance													
1. Enhancement of Internal Revenue Service resources	DOE				Estimat	e to be Pro	vided by th	e Congress	ional Budge	et 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
2. Application of backup withholding with respect to third		-2	-1				•	Ü					

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
3. 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
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
2. Extension of tax to fund Black Lung Disability Trust	•											,	ŕ
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													ŕ
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													
qualifying insurance corporations under passive foreign	tyba 12/31/17 &												
investment company rules	rma DOE	[4]	-2	-4	-5	-8	-9	-12	-14	-14	-14	-18	-81
8. Extension of period of limitation for certain legally married													
couples	DOE	-33	-22									-55	-55
9. Allow an above-the-line deduction of up to \$250 in union													
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													
(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													
businesses	tyba 12/31/21	-51	-81	-85	-89	-94	-98	-102	-107	-111	-113	-401	-932
15. Termination of employer credit for paid family and medical													
leave [29]	tyba 12/31/23			101	219	168	77	44	26	7		489	642
Total of Part 5 - Other Provisions		-484	-1,457	-1,055	-609	237	800	1,084	1,084	1,086	1,131	-3,369	1,809
TOTAL OF SUBTITLE H - RESPONSIBLY FUNDING OUR PR	IORITIES	43,855	53,609	118,079	120,610	153,874	183,253	191,940	192,363	190,837	195,528	490,028	1,443,946

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE I - DRUG PRICING: Selected Drug Manufacturer Excise Tax Imposed During Noncompliance Periods	ise Tax Imposed During Noncompliance Periods sa DOE sa DOE												
NET TOTAL		69,256	-8,997	80,629	77,203	104,814	142,593	151,780	141,694	131,827	133,723	184,391	886,005
Joint Committee on Taxation													
NOTE: Details may not add to totals due to rounding. The date of en	actment is assumed to	be before De	ecember 31	, 2021. Re	venue prov	isions as su	ıbmitted in	statutory d	raft GOE2	1E33.			
I 10 00000 (d for "Effective" column:												
e e e e e e e e e e e e e e e e e e e		c-: = c:	1:4:1_	1 :	- 0			/					
apiori = amounts paid, incurred, or received in apoia = amounts paid or incurred after		fpisa = faci fsoua = fue	-		aner				rganization	s occurring	on or after		
		ftcowba = ft				_	rts made af						
apoaa = amounts paid or accrued after ara = amounts received after		goda = gain							ons made aft				
bpisa = buildings placed in service after		itybasd = in				ah data					ond general		.er
cpasa = components produced and sold after		ityeasd = in	-	_	-					tion after	ond genera	tion bioruci	
cqba = calendar quarters beginning after		lai = losses	-	ars chang	arter such c	iaic			sa = sales a				
csa = constructive sales after		lii = losses	_								nanges only	after	
cya = calendar years after		lo/a = liquid										ests acquired	d or hold
cyba = calendar years beginning after		oia = obliga							on or afte		i other mier	esis acquirec	ı oı neid
da = days after		oii = obliga									one and ter	rminations af	fter
DOE = date of enactment		pa = period		J 111							uel produce		ittei
duaa = dwelling units acquired after		pci = produ		mencing in					-	-	urring after		
ema = expenditures made after		pmf = payn		_						ring on or a			
epasa = electricity produced and sold after		pma = payn								eginning aft			
epoia = expenditures paid or incurred after		ppisa = pro			after				•	ble years e			
fappisa = facilities and property placed in service after		ptcowba = 1				h			•	•	_	ied foreign c	ornorations
foetcowba = facilities or equipment the construction of		begins aft			01				beginning		01 SP 011	10.0.611 0	Pormions
which begins after		0.5								cles acquire	d 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 Table 21-2 093 continued:

<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2030</u>	<u>2031</u>	<u>2022-26</u>	<u>2022-31</u>
164	537	980	1,490	2,165	2,889	3,701	4,598	5,174	5,426	5,336	27,124
380	682	774	1,313	2,939	3,733	3,748	3,850	4,048	4,265	6,088	25,733
			328	504	504	504	832	353		832	3,024
2,104	1,396	1,562	1,692	1,781	1,842	651				8,534	11,028
34	96	173	283	421	558	699	859	917	908	1,007	4,948
55	62	70	82	98	117	130	145	159	159	367	1,077
708	986	569	378	382	253	183	115	81	17	3,022	3,672
627	1,130	1,223	1,186	1,116	349					5,282	5,632
93	147	152	162	175	185	190	165	120	72	730	1,461
	504	806	907	957	1,007	1,007	1,007	1,007	1,007	3,173	8,210
						9	262	901	1,708		2,881
					347	519	4,212	6,301	6,489		17,868
					726	1,022	1,070	1,126	775		4,720
78,647	21,355	12,236	11,714	12,669	3,604	3,527	3,503	3,515	3,551	136,621	154,322
	10,381									10,381	10,381
	5	5	5	5	5	5	5	5	5	20	45
5	7	8	8	15	18	19	20	21	22	43	143
	167	159	153	150						629	629
	6	6	6	6	6	6	5	5	5	23	50
		37	82	131	205	370	614	899	1,176	250	3,514
	164 380 2,104 34 55 708 627 93 78,647 5	164 537 380 682 2,104 1,396 34 96 55 62 708 986 627 1,130 93 147 504 78,647 21,355 10,381 5 5 7 167 6	164 537 980 380 682 774 2,104 1,396 1,562 34 96 173 55 62 70 708 986 569 627 1,130 1,223 93 147 152 504 806 78,647 21,355 12,236 10,381 5 5 5 7 8 167 159 6 6 37	164 537 980 1,490 380 682 774 1,313 328 2,104 1,396 1,562 1,692 34 96 173 283 55 62 70 82 708 986 569 378 627 1,130 1,223 1,186 93 147 152 162 504 806 907 78,647 21,355 12,236 11,714 5 5 5 5 7 8 8 167 159 153 6 6 6 6 6 37 82	164 537 980 1,490 2,165 380 682 774 1,313 2,939 328 504 2,104 1,396 1,562 1,692 1,781 34 96 173 283 421 55 62 70 82 98 708 986 569 378 382 627 1,130 1,223 1,186 1,116 93 147 152 162 175 504 806 907 957 78,647 21,355 12,236 11,714 12,669 10,381 5 5 5 5 5 7 8 8 15 167 159 153 150 6 6 6 </td <td>164 537 980 1,490 2,165 2,889 380 682 774 1,313 2,939 3,733 328 504 504 2,104 1,396 1,562 1,692 1,781 1,842 34 96 173 283 421 558 55 62 70 82 98 117 708 986 569 378 382 253 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 504 806 907 957 1,007 347 347 347 347 </td> <td>164 537 980 1,490 2,165 2,889 3,701 380 682 774 1,313 2,939 3,733 3,748 328 504 504 504 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 55 62 70 82 98 117 130 708 986 569 378 382 253 183 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 504 806 907 957 1,007 1,007 347 519 726 1,022 78,647 21,355</td> <td>164 537 980 1,490 2,165 2,889 3,701 4,598 380 682 774 1,313 2,939 3,733 3,748 3,850 328 504 504 504 832 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 859 55 62 70 82 98 117 130 145 708 986 569 378 382 253 183 115 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 165 504 806 907 957 1,007 1,007 1,007 </td> <td>164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 328 504 504 504 832 353 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 859 917 55 62 70 82 98 117 130 145 159 708 986 569 378 382 253 183 115 81 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 165 120 504 806 907 957 1,007</td> <td>164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 5,426 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 4,265 328 504 504 504 832 353 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 859 917 908 55 62 70 82 98 117 130 145 159 159 708 986 569 378 382 253 183 115 81 17 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 165<td>164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 5,426 5,336 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 4,265 6,088 328 504 504 504 832 353 832 2,104 1,396 1,562 1,692 1,781 1,842 651 8,534 34 96 173 283 421 558 699 859 917 908 1,007 55 62 70 82 98 117 130 145 159 159 367 708 986 569 378 382 253 183 115 81 17 3,022 627 1,130 1,223 1,186 1,116 349 5,282</td></td>	164 537 980 1,490 2,165 2,889 380 682 774 1,313 2,939 3,733 328 504 504 2,104 1,396 1,562 1,692 1,781 1,842 34 96 173 283 421 558 55 62 70 82 98 117 708 986 569 378 382 253 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 504 806 907 957 1,007 347 347 347 347	164 537 980 1,490 2,165 2,889 3,701 380 682 774 1,313 2,939 3,733 3,748 328 504 504 504 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 55 62 70 82 98 117 130 708 986 569 378 382 253 183 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 504 806 907 957 1,007 1,007 347 519 726 1,022 78,647 21,355	164 537 980 1,490 2,165 2,889 3,701 4,598 380 682 774 1,313 2,939 3,733 3,748 3,850 328 504 504 504 832 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 859 55 62 70 82 98 117 130 145 708 986 569 378 382 253 183 115 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 165 504 806 907 957 1,007 1,007 1,007	164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 328 504 504 504 832 353 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 859 917 55 62 70 82 98 117 130 145 159 708 986 569 378 382 253 183 115 81 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 165 120 504 806 907 957 1,007	164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 5,426 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 4,265 328 504 504 504 832 353 2,104 1,396 1,562 1,692 1,781 1,842 651 34 96 173 283 421 558 699 859 917 908 55 62 70 82 98 117 130 145 159 159 708 986 569 378 382 253 183 115 81 17 627 1,130 1,223 1,186 1,116 349 93 147 152 162 175 185 190 165 <td>164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 5,426 5,336 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 4,265 6,088 328 504 504 504 832 353 832 2,104 1,396 1,562 1,692 1,781 1,842 651 8,534 34 96 173 283 421 558 699 859 917 908 1,007 55 62 70 82 98 117 130 145 159 159 367 708 986 569 378 382 253 183 115 81 17 3,022 627 1,130 1,223 1,186 1,116 349 5,282</td>	164 537 980 1,490 2,165 2,889 3,701 4,598 5,174 5,426 5,336 380 682 774 1,313 2,939 3,733 3,748 3,850 4,048 4,265 6,088 328 504 504 504 832 353 832 2,104 1,396 1,562 1,692 1,781 1,842 651 8,534 34 96 173 283 421 558 699 859 917 908 1,007 55 62 70 82 98 117 130 145 159 159 367 708 986 569 378 382 253 183 115 81 17 3,022 627 1,130 1,223 1,186 1,116 349 5,282

[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, or erection after December 31, 2026.

[9] Estimate includes the following budget effects:	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
Total Revenue Effect	-20	-21	-23	-24	-16	-16	-18	-18	-19	-19	-103	-194
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 Table 21-2 093 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 dved diesel fuel or kerosene removed on or after the date which is 180 days after the date of enactment.

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[29] Estimate includes the following budget effects:	2022	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2030</u>	<u>2031</u>	<u>2022-26</u>	<u>2022-31</u>
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

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