Joint Committee on Taxation April 28, 1995 JCX-21-95

ESTIMATED BUDGET EFFECTS OF THE PROVISIONS RELATING TO THE "CONTRACT WITH AMERICA TAX RELIEF ACT OF 1995" AS PASSED BY THE HOUSE OF REPRESENTATIVES (Titles I, II, III, IV, and VI)

Fiscal Years 1995 - 2005

[Billions of Dollars]

Provision	Effective	1995	1996	1997	1998	1999	2000	1995-00	2001-05	1995-0
Title I. American Dream Restoration									, <u>-</u> -	
A. Family Tax Credit (\$500 in 1996, and										
thereafter; children under age 18; phase-out from \$200,000 to \$250,000)	1/1/00		4.0							
B. Credit to Reduce the Marriage Penalty	1/1/96		-4.6	-23.3	-24.1	-26.2	-26.7	-104.9	-157.9	-262.
C. Establishment of American Dream Savings	tyba DoE		-0.2	-2.0	-2.0	-2.0	-2.0	-8.2	-10.3	-18.
Accounts and Spousal IRAs:										
American Dream Savings Accounts	1/1/96	***	1.2	1.6	1.0	0.2	-2.0	2.0	00.5	0.4
2. \$2,000 Spousal IRA	1/1/96		[1]	-0.1	-0.1	-0.1	-2.0 -0.1	2.0 -0.5	-26.5 -0.5	-24.
TOTAL, Title I.	***************************************		3.7	-23.8	-25.2	-28.1	-30.9	-111.6	-195.2	-1. -306.
itle II. Senior Citizens' Equity									100.2	-300.
A. Repeal of increase in Tax on Social										
Security Benefits (phase-in 75%, 65%, 60%,										
55%, 50%)	1/1/96		-0.5	-1.9	-3.2	-4.3	-5.6	-15.6	-40.8	-56
B. Treatment of Long-Term Care Insurance	1/1/96		-0.9	-1.0	-1.2	-1.4	-1.6	-13.0 -6.1		• • • • • • • • • • • • • • • • • • • •
C. Tax Treatment of Accelerated Death			0.0	0	1.4-	1.77	-1.0	-0.1	-11.7	-17.
Benefits under Life Insurance Contracts	1/1/96		[1]	-0.1	-0.1	-0.2	-0.2	-0,6	-1.9	-2.
TOTAL, Title II.	*******************		-1.4	-3.0	-4.5	-5.9	-7.4	-22.3	-54.4	-76.

Provision	Effective	1995	1996	1997	1998	1999	2000	1995-00	2001-05	1995-05
Title III Joh Oversion and IV				···	 .					-1000 00
Title III. Job Creation and Wage Enhancement A. Capital Gains Reforms: Provisions in										
"Contract" but (a) indexing is not allowed to										
create losses; (b) no indexing and max rate										
of 25% for corporations; (c) collectibles -										
choice of indexing or 28% max rate; (d)										
holding period for indexing of 3 years; (e)										
indexing applies only to assets acquired										
after 1994, but with an election to										
mark-to-market for 1995; (f) net lease exclusion removed; and (g) other										
miscellaneous changes	1/1/95	0.0	44.0	5.0		400				
B. Leasehold Improvements Provision	lida 3/13/95	0.3 [1]	11.3 [1]	-5.2	-10.4	-13.0	-14.9	-31.9	-87.2	-119.0
C. Neutral Cost Recovery	ppisa 12/31/94	נין 1.2	رب _ا 9.2	[1] 10.0	[1] 6.3	[1] -1.2	[1] -8.8	[2] 16.7	[1]	[2]
D. Corporate Alternative Minimum Tax (AMT)		1.2	٥.٤	10.0	0.5	-1.2	-0.0	16.7	-105.4	-88.8
Reform: Prospective repeal of corporate										
AMT and business preferences under the										
individual AMT; Full repeal of the corporate	•									
AMT beginning in 2001	generally 1/1/96 [3]	-0.8	-2.7	-3.6	-3.3	-3.7	-2.7	-16.9	-17.7	-34,6
E. Interaction Between Neutral Cost Recovery	•									
(C.) and Corporate AMT (D.) Provisions [4]F. Deficit Reduction Checkoff and Trust Fund	tuba DaC	0.4	0.7	0.7	0.4	0.1	[5]	2.3	2.2	4.5
G. Small Business Incentives:	tyba DoE				No	Revenue	Effect -			
Increase in unified estate and gift tax										
credits [6]	1/1/96			-1.4	-1.6	-1.8	-2.1	-6.8	40.0	00.0
2. Increase in expense treatment for small				-1.4	-1.0	-1.0	-2.1	-0.6	-16.2	-23.0
businesses (\$22,500 for 1996, \$27,500										
for 1997, \$32,500 for 1998, and \$35,000										
for 1999 and thereafter)	tyba 12/31/95		-0.6	-1.4	-2.0	-2.1	-1.8	-7.8	-4.5	-12.3
Clarification of definition of principal place										
of business; Treatment of storage of	4 (4 (0.0				٠					
product samples	1/1/96		-0.1	-0.2	-0.2	-0.2	-0.2	-0.9	-1.0	-1.9
TOTAL, Title III.	***************************************	1.1	17.8	-1.1	-10.8	-21.9	-30.5	-45.3	-229.8	-275.1

Provision	Effective	1995	1996	1997	1998	1999	2000	1995-00	2001-05	1995-05
Fitle IV. Family Reinforcement										
A. Credit for Adoption Expenses B. Credit for Custodial Care of Certain Elderly	tyba 12/31/95		[1]	-0.2	-0.2	-0.2	-0.2	-1.0	-1.3	-2.
Dependents in Taxpayer's Home	tyba 12/31/95		-0.1	-0.2	-0.2	-0.2	-0.2	-1.0	-1.4	-2.3
TOTAL, Title IV.			-0.1	-0.4	-0.4	-0.4	-0.4	-2.0	-2.7	-4.0
itle VI. Technical Corrections					·		*U-1.			
A. Technical Corrections Provisions TOTAL, Title VI		[5]				;		[5]	[5]	[5
		[5]						[5]	[5]	[5
							e resonant on	da utriya 4 sedi	ojský je dokadací	Property (September 1989)
AL, REVENUE PROVISIONS (Titles I, II, III, IV, VI)	[7]	1.1	12.6	-28.3	-40.9	-56.4	-69.2	-181.2	-482.1	-663.3

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding.

Legend for "Effective" column: tyba DoE = taxable years beginning after date of enactment

ppisa = property placed in service after tyba = taxable years beginning after

lida = leasehold improvements disposed of after

- [1] Loss of less than \$50 million.
- [2] Loss of approximately \$100 million.
- [3] The Alternative Minimum Tax depreciation adjustment would be repealed for: (1) all property covered under the Neutral Cost Recovery System; and (2) all other depreciable property placed in service after March 13, 1995.
- [4] The positive interaction between these two provisions will go to zero if either of these provisions is removed from the package.
- [5] Gain of less than \$50 million.
- [6] Beginning after 1998, estimate includes indexing of the following: (1) the \$10,000 annual exclusions for gifts; (2) the \$750,000 ceiling amount on special use valuation under section 2032A of the Internal Revenue Code; (3) the \$1,000,000 generation-skipping transfer tax exemption; and (4) the value of closely held business eligible for the special four-percent interest rate under section 6601(j) of the Internal Revenue Code.
- [7] Total does not include all possible interaction among provisions.