

Provision	Effective	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1996-00	2001-05	1996-05
5. Authority to validate certain invalid elections.....	tyba 12/31/82	---	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-1
6. Allow interim closing of the books.....	tyba 12/31/96	---												
7. Expand post-termination period and amend subchapter S audit procedures.....														
8. S corporations permitted to hold S or C subsidiaries.....	tyba 12/31/96	---	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-1
9. Treatment of distributions during loss years.....	tyba 12/31/96	---	-5	-9	-11	-13	-15	-17	-20	-23	-26	-38	-101	-139
10. Treatment of S corporations as shareholders in C corporations.....	tyba 12/31/96	---	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-1
11. Elimination of certain earnings and profits of S corporations.....	tyba 12/31/96	---	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[4]	[5]	[6]
12. Treatment of certain losses carried over under at-risk rules.....	tyba 12/31/96	---	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[4]	[5]	[6]
13. Adjustments to basis of inherited S stock.....	tyba 12/31/96	---	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[4]	[5]	[6]
14. Treatment of certain real estate held by an S corporation.....	dda DOE	---	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]	[7]
15. Transition rule for elections after termination.....	tyba 12/31/96	---	-1	-1	-2	-2	-2	-2	-2	-2	-2	-6	-10	-16
16. Treat financial institutions that do not use the reserve method as eligible corporations.....	tyba 12/31/96	---	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[4]	[5]	[6]
17. Permit tax-exempts to be subchapter S shareholders with UBTI inclusion and ESOP benefit restriction.....	tyba 12/31/96	---	-1	-3	-5	-6	-8	-10	-12	-14	-15	-15	-59	-74
18. Interaction of subchapter S changes.....	tyba 12/31/97	---	---	-3	-9	-11	-13	-15	-17	-19	-21	-23	-85	-108
Subtotal of Provisions Relating to S Corporations.....	---	---	-32	-73	-92	-106	-115	-125	-136	-147	-157	-303	-680	-987
II. Pension Simplification Provisions														
A. Simplified Distribution Rules														
1. Repeal of 5-year income averaging for lump-sum distributions.....	tyba 12/31/99	---	74	77	108	78	70	44	17	15	---	337	145	482
2. Repeal of \$5,000 exclusion of employees' death benefits.....	dda DOE	---	28	49	52	54	55	55	56	57	57	183	280	463
3. Simplified method for taxing annuity distributions under certain employer plans.....	asda 90 da DOE	---	22	28	28	29	29	29	30	30	31	107	149	256
4. Minimum required distributions.....	yba 12/31/96	---	-1	-4	-4	-4	-4	-4	-4	-4	-4	-13	-20	-33
B. Increased Access to Retirement Savings Plans -														
1. Establish SIMPLE pension plan as modified, but repeal salary reduction SEPs.....	yba 12/31/96	---	-50	-76	-79	-81	-84	-87	-91	-94	-97	-285	-453	-735
2. Tax-exempt organizations eligible under section 401(k).....	yba 12/31/96	---	-8	-22	-24	-25	-26	-28	-29	-30	-31	-79	-144	-223
3. Increase availability of spousal IRAs.....	yba 12/31/96	---	-57	-168	-184	-195	-206	-219	-233	-248	-264	-604	-1,170	-1,774
C. Nondiscrimination Provisions														
1. Simplified definition of highly compensated employees [8].....	yba 12/31/96	---	[9]	[9]										
2. Repeal of family aggregation rules [8].....	yba 12/31/96	---	[10]	[10]										
3. Modification of additional participation requirements.....	yba 12/31/96	---												
4. Safe-harbor nondiscrimination rules for qualified cash or deferred arrangements and matching contributions [11].....	yba 12/31/98	---				-39	-155	-160	-164	-169	-174	-179	-195	-847
5. Definition of compensation for section 415 purposes.....	yba 12/31/97	---		-1	-1	-2	-2	-2	-2	-2	-3	-4	-11	-15

Negligible Revenue Effect

Considered in Other Provisions

Considered in Other Provisions

Negligible Revenue Effect

Provision	Effective	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1996-00	2001-05	1996-05
D. Miscellaneous Provisions														
1. Plans covering self-employed individuals.....	yba 12/31/96													
----- <i>Negligible Revenue Effect</i> -----														
2. Elimination of special vesting rule for multiemployer plans.....	yba 12/31/96	---	[2]	-1	-1	-1	-1	-1	-1	-1	-1	-3	-5	-8
3. Distributions under rural cooperative plans.....	DOE													
----- <i>Negligible Revenue Effect</i> -----														
4. Treatment of governmental plans under section 415.....	yba 12/31/94													
----- <i>Negligible Revenue Effect</i> -----														
5. Uniform retirement age [8].....	yba 12/31/96	---	[10]	[10]										
----- <i>Considered in Other Provisions</i> -----														
6. Contributions on behalf of disabled employees.....	yba 12/31/96													
----- <i>Negligible Revenue Effect</i> -----														
7. Treatment of deferred compensation plans of State and local governments and tax-exempt organizations.....	tyba 12/31/96	---	[2]	-1	-1	-1	-2	-2	-2	-2	-2	-3	-10	-13
8. Require section 457 plan assets to be held in trust.....	DOE	---	-7	-21	-24	-25	-25	-26	-27	-28	-29	-77	-135	-212
9. Correction of GATT interest and mortality rate provisions in the Retirement Protection Act.....	[12]	---	-4	-4	-4	---	---	---	---	---	---	-12	---	-12
10. Multiple salary reduction agreements permitted under section 403(b).....	tyba 12/31/95													
----- <i>Negligible Revenue Effect</i> -----														
11. Application of elective deferral limit to section 403(b) plans.....	tyba 12/31/95													
----- <i>Negligible Revenue Effect</i> -----														
12. Treatment of Indian tribal governments under section 403(b).....	cpbo/a 12/31/96													
----- <i>Negligible Revenue Effect</i> -----														
13. Modify notice required of right to qualified joint and survivor annuity.....	pyba 12/31/96													
----- <i>Negligible Revenue Effect</i> -----														
14. Repeal of combined plan limit.....	lyba 12/31/99	---	---	---	---	-72	-195	-201	-207	-213	-219	-72	-1,035	-1,107
15. 3-year waiver of excess distribution tax.....	1/1/97	---	42	44	47	32	---	---	---	---	---	165	---	165
16. Increase section 4975 excise tax on prohibited transactions from 5% to 10%.....	ptoa DOE	---	2	4	4	4	4	4	4	4	4	14	20	34
17. Treatment of leased employees.....	yba 12/31/96													
----- <i>Negligible Revenue Effect</i> -----														
18. Uniform penalty provision to apply to certain pension reporting requirements.....	1/1/97													
----- <i>No Revenue Effect</i> -----														
19. Clarify that SECA does not apply to certain parsonage allowance income.....	ybbo/a 12/31/94													
----- <i>Negligible Revenue Effect</i> -----														
20. Direct IRS to develop model forms for qualified domestic relations orders ("QDRO") and spousal consent provisions.....	DOE													
----- <i>Negligible Revenue Effect</i> -----														
21. Date of adoption of plan amendments.....	DOE													
----- <i>No Revenue Effect</i> -----														
22. Permit volunteer firefighters to make deferrals under section 457 (limited to \$3,000 per year).....	do/a 1/1/97	---	-2	-5	-7	-9	-11	-13	-16	-18	-20	-23	-78	-101
Subtotal of Pension Simplification Provisions.....		---	34	-106	-129	-373	-558	-615	-674	-708	-757	-564	-3,314	-3,875
III. Extension of Certain Expiring Provisions														
1. Extend the work opportunity tax credit, with modifications through 9/30/97 [13].....	10/1/96	---	-117	-143	-83	-33	-12	-2	---	---	---	-376	-14	-390
2. Employer-provided educational assistance; sunset after 12/31/96.....	1/1/95	-136	-740	---	---	---	---	---	---	---	---	-876	---	-876
3. R&E credit, with modifications through 6/30/97.....	7/1/96	-202	-745	-469	-232	-165	-89	-20	---	---	---	-1,813	-109	-1,922
4. Orphan drug tax credit through 6/30/97 with section 39 benefits.....	7/1/96	-6	-18	-1	-1	-1	-1	[2]	[2]	[2]	[2]	-26	-2	-28
5. Contribution of appreciated stock to private foundations through 6/30/97.....	7/1/96	-14	-86	-11	-4	---	---	---	---	---	---	-115	---	-115

Provision	Effective	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1996-00	2001-05	1996-05
6. Extend section 29 binding contract date to 6 months after date of enactment and placed-in service date to 1/1/98 for biomass and coal.....	DOE	---	-8	-32	-51	-51	-40	-35	-36	-37	-38	-142	-187	-329
7. Suspend excise tax on motorboat diesel through 6/30/97.....	7/1/96	-8	-26	---	---	---	---	---	---	---	---	-34	---	-34
Subtotal of Certain Expiring Provisions.....		-366	-1,740	-656	-371	-250	-142	-57	-36	-37	-38	-3,382	-312	-3,694
IV. Revenue Offsets														
1. Possessions tax credit: Wage credit companies - 6 years of present law, thereafter subject to income cap and, after 10 years, wage credit percentage lowered to 40%; Income companies - 2 years of present law followed by 8 years subject to income cap; QPSII - repealed later of taxable years beginning after 12/31/95 or earnings after 6/30/96.....	tyba 12/31/95	190	595	540	530	475	500	685	1,075	1,295	1,555	2,330	5,110	7,440
2. Repeal 50% interest income exclusion for financial institution loans to ESOPs [14].....	Ima DOE	10	64	105	144	182	220	256	292	327	360	505	1,455	1,960
3. Provide that punitive damages are not excludable from income.....	ara 6/30/96	---	5	7	7	7	8	8	8	8	8	26	40	66
4. Provide for flow through treatment for Financial Asset Securitization Investment Trusts (FASITs).....	DOE	---	36	18	9	3	-2	-7	-12	-17	-22	66	-60	6
5. Phase out and extend luxury automobile excise tax through 12/31/02.....	sma 6/30/96	-10	-58	-105	-132	124	183	140	32	---	---	-180	355	175
6. Modify two county tax-exempt bond rule for local furnishers of electricity or gas; prohibit new local furnishers (with current service areas grandfathered).....	DOE	---	[15]	5	1	-1	3	4	8	16	22	5	53	58
7. Eliminate interest allocation exception for certain nonfinancial corporations.....	tyba 12/31/95	35	99	107	123	141	163	187	201	215	228	505	994	1,499
8. Reinstate Airport and Airway Trust Fund excise taxes through 12/31/96, with exemption for fixed-wing emergency medical aircraft, and mining, oil, and gas industry helicopters for flights not using FAA services.....	tp7data DOE	392	1,530	---	---	---	---	---	---	---	---	1,922	---	1,922
9. Tax-free treatment of contributions in aid of construction for water utilities; change depreciation for water utilities.....	[16]	---	-21	-9	-3	11	24	35	45	55	64	-22	223	201
10. Revision of expatriation tax rules.....	2/6/95	15	37	63	97	139	181	216	247	275	298	351	1,217	1,568
Subtotal of Revenue Offsets.....		632	2,287	731	776	1,081	1,280	1,524	1,896	2,174	2,513	5,508	9,387	14,895
V. Technical Corrections.....		14	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	14	[3]	14
SUBTOTAL OF PARTS I., II., III., IV., AND V.		255	414	-368	-173	-84	-409	-326	-100	174	520	55	-147	-94
VI. Other Provisions														
A. Miscellaneous Provisions														
1. Exempt from diesel dyeing requirement any States exempt from Clean Air Act dyeing requirement.....	fcqa DOE	[2]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-3	-3	-6

Provision	Effective	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1996-00	2001-05	1996-05
2. Application of common paymaster rules to certain agency accounts at State universities [17].....	rpa 12/31/96	---	[18]	[18]	[18]	[18]	[18]	[18]	[18]	[18]	[18]	[18]	[18]	[18]
3. Exempt imported recycled halons from ozone-depleting chemicals tax.....	cia 12/31/96	---	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-5	-9
4. Authorize tax-exempt bonds for purchase of Alaska Power Authority.....	bia DOE	---	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-5	-9
5. Allow for tax-free conversion of common trust funds to mutual funds.....	ta 12/31/95	-4	-9	-8	-8	-8	-8	-8	-9	-9	-9	-37	-43	-80
6. Clarify that State prepaid tuition plans are tax-exempt entities; clarify OID rules.....	tyba 12/31/95	----- Negligible Revenue Effect -----												
7. Suspend excise tax on ozone depleting chemicals used in metered dose inhalers.....	DOE + 7 days	---	-12	-8	-8	-2	---	---	---	---	---	-30	---	-30
Subtotal of Miscellaneous Provisions.....		[2]	-24	-19	-19	-13	-11	-11	-12	-12	-12	-78	-56	-134
B. Additional Revenue Offsets														
1. Modify basis adjustment rules under section 1033.....	ica DOE	---	1	5	9	14	20	29	37	46	56	29	188	217
2. Repeal exemption for withholding on gambling winnings from bingo and keno where proceeds exceed \$5,000.....	DOE + 30 days	3	12	6	6	6	7	7	7	7	8	33	36	69
3. Treatment of certain insurance on retired lives.....	tyba 12/31/95	---	2	1	-2	5	2	[2]	10	-5	2	6	8	14
Subtotal of Additional Revenue Offsets.....		3	15	12	13	25	29	36	54	48	66	68	232	300
SUBTOTAL OF PART VI.....		3	-9	-7	-6	12	18	25	42	36	54	-10	176	166
NET TOTAL		258	405	-375	-179	-72	-391	-301	-58	210	574	45	29	72

Joint Committee on Taxation

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

Legend for "Effective" column: ara = amounts received after
asda = annuity starting date after
bia = bonds issued after
cia = chemicals imported after
cpbo/a = contracts purchased before, on, or after
dda = decedents dying after
DDA = disasters declared after
do/a = deferrals on or after
DOE = date of enactment
fcqa = first calendar quarter after
ica DOE = involuntary conversions after date of enactment
lida = leasehold improvements disposed of after
lma = loans made after
lyba = limitation years beginning after

ppiso/a/b = property placed in service on, after, or before
ptoa = prohibited transactions occurring after
pyba = plan years beginning after
rpa = remuneration paid after
sma = sales made after
spa = services performed after
ta = transfers after
tyba = taxable years beginning after
tp7data DOE = tickets purchased 7 days after date of enactment for travel 7 days after date of enactment
yba = years beginning after
ybbo/a = years beginning before, on, or after
90 da DOE = 90 days after date of enactment

Provision	Effective	1996	1997	1998	1999	2000	2001	2002	2003	2004	2005	1996-00	2001-05	1996-05
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Footnotes for JCX-30-96:

- [1] Effective as if included in the Omnibus Reconciliation Act of 1993.
- [2] Loss of less than \$500,000.
- [3] Loss of less than \$5 million.
- [4] Loss of less than \$15 million.
- [5] Loss of less than \$20 million.
- [6] Loss of less than \$30 million.
- [7] Gain of less than \$1 million.
- [8] Revenue effect after 1/1/99 included in the revenue estimate for the safe harbor provision due to interactions between this provision and Item III.C.4.
- [9] Loss of less than \$10 million.
- [10] Negligible revenue effect.
- [11] This provision considers interaction effects of SIMPLE retirement plan provisions (Items III.C.1, III.C.2, and III.D.5)
- [12] Effective as if included in the General Agreement on Tariffs and Trade of 1994.
- [13] Credit rate at 35% on first \$6,000 of income; eligible workers expanded to include welfare cash recipients, veteran foodstamp recipients, and 18 - 24 year olds living in a household receiving food stamps for a period of at least 3 months on the date of hire without pre-certification; 375 hour work requirement; 21 day certification requirement.
- [14] The repeal would not apply to loans made pursuant to a binding contract entered into before 6/10/96.
- [15] Gain of less than \$500,000.
- [16] Effective for amounts received after 6/12/96 and property placed in service after 6/12/96 with the exception of certain property subject to a binding contract before 6/10/96.
- [17] Estimates provided by the Congressional Budget Office.
- [18] Loss of less than \$1 million.