JOINT COMMITTEE ON TAXATION May 28, 2020 JCX-16-20

ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS CONTAINED IN H.R. 6800, THE "HEALTH AND ECONOMIC RECOVERY OMNIBUS EMERGENCY SOLUTIONS ('HEROES') ACT," AS PASSED BY THE HOUSE OF REPRESENTATIVES ON MAY 15, 2020

Fiscal Years 2020 - 2030

[Millions of Dollars]

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
DIVISION B - REVENUE PROVISIONS														
THE "COVID-19 TAX RELIEF ACT OF 2020"														
I. Economic Stimulus														
A. 2020 Recovery Rebate Improvements - include \$500 rebates for dependents; replace Social Security Number ("SSN") requirement with a taxpayer identification number ("TIN") requirement; 2020 recovery rebates not subject to reduction or offset with respect to past-due support; protection of 2020 recovery rebates; payments to representative payees and fiduciaries; and application to taxpayers with respect to whom advance payment has already been made (sunset														
12/31/20)	[1] & DOE	-20,410	-2,268										-22,678	-22,678
B. Additional Recovery Rebates to Individuals - \$1,200 for singles/\$2,400 for married filing jointly, and \$1,200 per dependent (maximum of 3); phaseout rate of 5% for AGI over \$75,000 for single/\$112,500 for head of household/\$150,000 for married filing jointly; TIN requirement; and payments to certain Federal beneficiaries													,	
(sunset 12/31/20) [2]	DOE	-404,276	-8,251										-412,527	-412,52
C. Earned Income Tax Credit														
1. Strengthening the earned income tax credit for individuals														
with no qualifying children (sunset 12/31/20) [3]	tyba 12/31/19		-10,140										-10,140	-10,14
2. Taxpayer eligible for childless earned income credit														
in case of qualifying children who fail to meet certain														
identification requirements [3]	tyba DOE			-1	-1	-1	-1	-1	-2	-2	-2	-2	-4	-1
3. Credit allowed in case of certain separated spouses [3]	tyba DOE			-22	-23	-24	-26	-27	-28	-29	-30	-31	-95	-23
4. Elimination of disqualified investment income test [3]	tyba DOE			-391	-372	-396	-406	-425	-447	-445	-445	-452	-1,565	-3,77
5. Application of earned income tax credit in possessions of	D 0 D					= 2 4				0.04			• • • •	
the United States [3]	DOE		-82	-702	-720	-736	-753	-770	-785	-801	-818	-836	-2,993	-7,00
6. Temporary special rule for determining earned income for	ftybi 2020		-3,110										-3,110	2 1 1
purposes of earned income tax credit [3] D. Child Tax Credit - child tax credit fully refundable;	itybi 2020		-3,110										-3,110	-3,110
include 17 year olds; \$3,000 credit amount (\$3,600 if														
child younger than 6 years old) (sunset 12/31/20); and														
payments to possessions [3]	tyba 12/31/19	4 420	-108,775	-768	-833	-899	-906	-954	-311	-316	-320	-316	-116,601	-118,818

Page 2

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
E. Dependent Care Assistance														
1. Refundability and enhancement of child and dependent														
care tax credit (sunset 12/31/20) [3]	tyba 12/31/19	-112	-5,577										-5,689	-5,689
2. Increase in exclusion for employer-provided dependent	tyou 12/01/19	112	5,577										5,005	2,007
care assistance (sunset 12/31/20) [4]	tyba 12/31/19	-35	-141										-176	-176
F. Flexibility for Certain Employee Benefits	tyou 12/01/19	55	111										170	170
1. Increase in carryover for health flexible spending														
arrangements [5]	DOE	15	225	94									335	335
2. Carryover for dependent care flexible spending														
arrangements [6]	DOE		217	54									271	271
3. Carryover of paid time off	DOE					Estin	mate Inclua	led in Divi	sion B, Iten	n I.F.1				
4. Change in election amount	DOE					Estin	mate Inclua	led in Divi	sion B, Iten	n I.F.1				
5. Extension of grace periods, etc	DOE					Estimate I	ncluded in	Division B	, Items I.F.	1. and I.F.	2			
6. Plan amendments	DOE					Estimate I	ncluded in	Division B	, Items I.F.	1. and I.F.	2			
G. Deduction of State and Local Taxes - Elimination for														
2020 and 2021 of Limitation on Deduction of State and														
Local Taxes	tpoai tyba 12/31/19	-1,623	-94,360	-44,993	4,381								-136,595	-136,595
Total of Economic Stimulus		430,861	-232,262	-46,729	2,432	-2,056	-2,092	-2,177	-1,573	-1,593	-1,615	-1,637	-711,567	-720,161
II. Additional Relief for Workers														
A. Additional Relief														
1. Increase in above-the-line deduction for certain expenses														
of elementary and secondary school teachers	tyba 12/31/19		-162	-138	-144	-172	-173	-181	-214	-241	-211	-213	-789	-1,848
2. Above-the-line deduction allowed for certain expenses of	tyba 12/51/19		-102	-156	-144	-1/2	-175	-101	-214	-241	-211	-215	-789	-1,040
first responders	tyba 12/31/19	-103	-180	-183	-186	-190	-198	-205	-208	-210	-213	-221	-1,041	-2,098
3. Temporary above-the-line deduction for supplies and	tyba 12/51/19	-105	-160	-105	-100	-190	-198	-203	-208	-210	-215	-221	-1,041	-2,098
equipment of first responders and COVID-19 front line														
employees (sunset 12/31/20)	tyba 12/31/19	-775	-560										-1,335	1 2 2 5
 Payroll credit for certain pandemic-related employee 	tyba 12/31/19	-775	-300										-1,555	-1,335
	anabana 2/12/20	28 520	4 2 1 6										-42,845	12 945
benefit expenses paid by employers (sunset 12/31/20)	qprebepa 3/12/20	-38,529	-4,316										-42,845	-42,845
B. Tax Credits to Prevent Business Interruption														
1. Improvements to employee retention credit	[7]	120.070	22 601										162 571	162 571
(sunset 12/31/20)	[7]	-130,970	-32,601										-163,571	-163,571
2. Payroll credit for certain fixed expenses of employers														
subject to closure by reason of COVID-19 (sunset	afan aga 2/12/20	24 441	6 110										20 552	20 552
12/31/20)	qfepoaa 3/12/20	-24,441	-6,110										-30,552	-30,552
 Business interruption credit for certain self-employed individuals (sunset 12/31/20) 	DOE	-17,034	-4,259										-21,293	-21,293
C. Credits for Expanded Paid Sick and Family Leave -		,	,										,'	,
extension of credits; repeal of reduced rate of credit for														
certain leave; increase in limitations on credits for paid family	ý													
leave; election to use prior year net earnings from														
self-employment in determining average daily														
self-employment income; Federal, State, and local														
governments allowed tax credits for paid sick and paid														
family and medical leave; certain technical improvements;														
	FOL DOD 0													
and credits not allowed to certain large employers (sunset 12/31/21) [3][9]	[8], DOE & wpa DOE												-32,008	

D	2
Page	: 5

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
D. Other Relief														
1. Payroll tax deferral allowed for recipients of certain loan														
forgiveness (sunset 12/31/20)	[10]	-9,498	-8,091	8,584	8,478								-528	-528
2. Emergency financial aid grants not includible in gross income	e													
and do not reduce educational tax credits [3]	qefagma 3/26/20		-269	-67									-337	-337
3. Certain loan forgiveness and other business financial														
assistance under CARES Act not includible in gross														
income	[11]						Na	Revenue	Effect					
4. Authority to waive certain information reporting														
requirements	DOE						Na	Revenue	Effect					
5. Clarification of treatment of expenses paid or incurred														
with proceeds from certain grants and loans	[11]						Na	Revenue	Effect					
6. Reinstatement of certain protections for taxpayer return	54.03								T 00					
information	[12]						Neglig	ible Reven	ue Effect -					
Total of Additional Relief for Workers		229,938	-76,682	4,910	8,148	-362	-371	-386	-422	-451	-424	-434	-294,299	-296,415
III. Net Operating Losses														
1. Limitation on excess business losses of non-corporate														
taxpayers restored and made permanent	tyba 12/31/17	64,160	72,455	-1,773	-793	-394	-202	8,913	24,428	25,517	26,468	27,461	133,454	246,240
2. Certain taxpayers allowed limited carryback of net operating														
losses arising in 2019 and 2020 only	[13]	54,181	1,729	-2,830	-4,457	-6,969	-8,965	-8,979	-6,024	-4,104	-2,678	-3,018	32,689	7,887
Total of Net Operating Losses		. 118,341	74,184	-4,603	-5,250	-7,363	-9,167	-66	18,404	21,413	23,790	24,443	166,143	254,127
TOTAL OF DIVISION B		542,458	-234,760	-46,422	5,330	-9,781	-11,630	-2,629	16,409	19,369	21,751	22,372	-839,723	-762,449
NUMBER OF THE AT THE REQUISIONS														
DIVISION C - HEALTH PROVISIONS														
III. Private Insurance Provisions 1. Worker Health Coverage Protection - Premium Assistance														
for COBRA Continuation Coverage and Furloughed														
Continuation Coverage for Individuals and Their Families	cpbo/a 3/1/20 &													
(sunset 1/31/21) [14]	tyea DOE	-55,699	-42,002										-97,700	-97,700
· · · · ·	•	<i>,</i>	,										,	-
TOTAL OF DIVISION C		55,699	-42,002										-97,700	-97,700
DIVISION D - RETIREMENT PROVISIONS														
THE "EMERGENCY PENSION RELIEF ACT OF 2020"														
I. Relief for Multiemployer Pension Plans [3][15]	various	-31	-6,239	6 1 4 1	-6,138	-6,184	-6,064	-4.827	-4,896	-5,798	-5,778	-5,776	-30,797	-57,871
1. Kenet for Municippoyer 1 ension r fans [5][15]	various	-51	-0,239	-6,141	-0,130	-0,104	-0,004	,04/	-4,070	-3,170	-3,770	-3,770	-30,797	-57,071
II. Relief for Single Employer Pension Plans														
1. Extended amortization for single employer														
plans [3][15][16]	pyba 12/31/19	14	112	415	870	1,393	2,736	2,061	2,931	2,744	2,228	1,561	5,540	17,065
2. Extension of pension funding stabilization percentages for	PJ04 12/51/17	17	112	715	070	1,575	2,750	2,001	2,751	2,744	2,220	1,201	5,540	17,005
single employer plans [3]	pyba 12/31/19					Es	timate Inclu	ded in Div	ision D Ita	em II.1				
	1.									11.1		_		
Total of Relief for Single Employer Pension Plans		. 14	112	415	870	1,393	2,736	2,061	2,931	2,744	2,228	1,561	5,540	17,065

Provision	Effective	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
III. Other Retirement Related Provisions														
 Waiver of required minimum distributions for 2019 Waiver of 60-day rule in case of rollover of otherwise 	[17]	-3,684	-1,688	29	282	260	250	279	284	272	263	255	-4,551	-3,198
required minimum distributions in 2019 or 2020	tyba 12/31/18					Esti	mate Inclu	ded in Divi	sion D, Iter	n III.1 ·				
CARES Act loan limits from employer plans	[18] -						Neglig	ible Reven	ue Effect -					
 Exclusion of benefits provided to volunteer firefighters and emergency medical responders made permanent 	tyba 12/31/20		-63	-71	-72	-74	-75	-77	-78	-79	-81	-83	-355	-753
 Application of special rules to money purchase pension plans 	DOE	2	-59	-9	-1	-1	-1	-1	-1	-1	-2	-2	-68	-75
 Modification of special rules for minimum funding standards for community newspaper plans [3][15][19] 	pyea 12/31/17	16	21	34	45	46	68	31	52	49	45	40	228	445
7. Minimum rate of interest for certain determinations														
related to life insurance contracts	cia 12/31/20	-3,666	-8 -1,797	-38 - 55	-92 162	-160 71	-242 0	-334 -102	-438 -181	-553 - 312	-672 - 447	-791 -581	-540 -5,286	-3,328 -6,909
TOTAL OF DIVISION D		-3,683	-7,924	-5,781	-5,106	-4,720	-3,328	-2,867	-2,146	-3,366	-3,998	-4,797	-30,543	-47,715
 DIVISION K - COVID-19 HERO ACT V. Forgiving Student Loan Debt and Protecting Student Borrow 1. Up to \$10,000 write-down of Federal student loans excluded from income [20] 2. No recapture of tax benefits and exclusion from income for relief for defrauded borrowers [20] 	wers DOE DOE	-158	-15,657 -1	49 -2	146 -2	146 -1	142 -1	139 -1	150 -1	139 [21]	137 [21]	125 [21]	-15,333 -7	-14,643 -9
TOTAL OF DIVISION K	••••••	-158	-15,658	47	144	145	141	138	149	139	137	125	-15,340	-14,652
DIVISION N - GIVING RETIREMENT OPTIONS TO WORKERS ACT [3][15]	various .					Esti	imate Inclu	ded in Div	ision D, It	em I.1				
DIVISION Q - COVID-19 HEROES FUND THE "COVID-19 HEROES FUND ACT OF 2020" [20][14]	DOE -						No	Revenue I	Effect					

Page 4

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be June 1, 2020.

Legend and Footnotes for JCX-16-20:

Legend for "Effective" column:		
cpbo/a = coverage period beginning on or after	qfepoaa = qualified fixed expenses paid or accrued after	tpoai = taxes paid or accrued in
cia = contracts issued after	qprebepa = qualified pandemic-related employee benefit	tyba = taxable years beginning after
DOE = date of enactment	expenses paid after	tyea = taxable years ending after
ftybi = first taxable year beginning in	pyba = plan years beginning after	wpa = wages paid after
qefagma = qualified emergency financial aid grants made after	pyea = plan years ending after	

[1] Effective as if included in section 2201 of the "Coronavirus Aid, Relief, and Economic Security ('CARES') Act," (Public Law 116-136).

[2] The estimated change in net revenues shown here accounts for any rebates sent based on information provided by the Social Security Administration, Veterans Administration, and Internal Revenue Service, as well as payments to possessions.

payments to possessions.													
[3] Estimates contain the following outlay effects:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
Strengthening the earned income tax credit for individuals with no qualifying													
children (sunset 12/31/20)		8,933										8,933	8,933
Taxpayer eligible for childless earned income credit in case of qualifying children													
who fail to meet certain identification requirements			9	9	10	10	10	2	2	2	2	37	55
Credit allowed in case of certain separated spouses			1	1	1	1	1	2	2	2	2	4	13
Elimination of disqualified investment income test			257	257	276	284	295	306	305	307	311	1,074	2,598
Application of earned income tax credit in possessions of United States		82	702	720	736	753	770	785	801	818	836	2,993	7,003
Temporary special rule for determining earned income for purposes of earned													
income tax credit		2,799										2,799	2,799
Child Tax Credit - child tax credit fully refundable; include 17 year olds; \$3,000 credit													
credit amount (\$3,600 if child younger than 6 years old); (sunset 12/31/20); and													
payments to possessions		88,390	768	833	899	906	954	311	316	320	316	91,796	94,013
Refundability and enhancement of child and dependent care tax credit													
(sunset 12/31/20)		3,443										3,443	3,443
Credits for Expanded Paid Sick and Family Leave (sunset 12/31/21)	230	2,090	362									2,681	2,681
Emergency financial aid not includible in gross income and does not reduce													
educational tax credits		159	40									199	199
Modification of special rules for minimum funding standards for													
community plans [15]		-9	-10	-15	-19	-46	-4	-29	-33	-37	-40	-99	-242
Relief for multiemployer pension plans [15]	31	6,245	6,151	6,149	6,208	6,152	5,039	5,169	6,101	6,117	6,140	30,936	59,503
Extended amortization for single employer plans [15]		-18	-75	-176	-323	-1,191	-162	-1,009	-1,214	-1,356	-1,433	-1,783	-6,957
Extension of pension funding stabilization percentages for single employer plans				Outlay	s Included	l in Extend	amortizatio	on for sing	le employe	r, above -			
Giving Retirement Options to Workers Act				Outla	ys Include	d in Relief j	for multien	ıployer per	nsion plans	s, above			
[4] Estimate includes the following budget effects:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
Total Revenue Effect	-35	-141										-176	-176
On-budget effects	-26	-104										-130	-130
Off-budget effects	-9	-37										-47	-47
[5] Estimate includes the following budget effects:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
Total Revenue Effect	15	225	94									335	335
On-budget effects	10	152	63									225	225
Off-budget effects	5	73	31									109	109

Page 6

Footnotes for JCX-16-20 continued:

[6] Estimate includes the following budget effects:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
Total Revenue Effect		217	54									271	271
On-budget effects		160	40									200	200
Off-budget effects		57	14									71	71
[7] Effective as if included in section 2301 of the CARES Act.													
[8] Effective on date of enactment of the Families First Coronavirus Response Act.													
[9] Includes revenue effects of Division L, Title I - Amendments to Emergency Family and M	Aedical Lea	ave Expans	sion Act an	d Emergen	ncy Paid Sid	ck Leave A	.ct.						
[10] Effective as if included in section 2302 of the CARES Act.													
[11] Effective for taxable years ending after the date of enactment of the CARES Act.													
[12] Effective for disclosures made after the date of the enactment of the FUTURE Act (Public	c Law 116-	91).											
[13] Effective as if included in section 2303(b) of the CARES Act.													
[14] Estimate provided by the Joint Committee on Taxation staff in collaboration with the Com	gressional	Budget Of	ffice.										
[15] Estimate provided by the Congressional Budget Office.													
[16] Estimate includes the following budget and outlay effects:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
Total Revenue Effect	14	112	415	870	1,393	2,736	2,061	2,931	2,744	2,228	1,561	5,540	17,065
On-budget effects	13	81	290	580	878	1,242	1,527	1,544	1,218	690	106	3,083	8,167
Off-budget effects	1	14	51	115	191	303	373	378	312	181	22	674	1,941
[17] Provision shall take effect as if included in the enactment of section 2203 of the Coronavi	rus Aid, R	elief, and H	Economic S	Security Ac	et, except th	nat subpara	graph (c)(1) thereof s	hall be app	lied by sub	stituting D	ecember 31,	2018,
for December 31, 2019.													
[18] Provision shall take effect as if included in the enactment of section 2202(b) of the Coron	avirus Aid	, Relief, an	d Econom	ic Security	Act.								
[19] Estimate includes the following budget and outlay effects:	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2030	2020-25	2020-30
Total Revenue Effect	16	21	34	45	46	68	31	52	49	45	40	228	445
On-budget effects	12	7	18	24	21	16	22	18	13	6	-25	99	133
Off-budget effects	4	4	5	6	6	6	6	5	3	1	25	30	70
[20] Estimate does not include any potential outlay effects which would be estimated by the C	ongression	al Budget	Office										

[20] Estimate does not include any potential outlay effects which would be estimated by the Congressional Budget Office.

[21] Loss of less than \$500,000.