



JOINT COMMITTEE ON TAXATION

March 23, 2011

JCX-20-11

**ERRATA**  
**“GENERAL EXPLANATION OF TAX LEGISLATION**  
**ENACTED IN THE 111TH CONGRESS”**

1. On page 555, add the following footnote 1582A to the word “amount” in the next to last sentence in example 3:

The provision adds new section 2010(c)(4), which generally defines “deceased spousal unused exclusion amount” of a surviving spouse as the lesser of (a) the basic exclusion amount, or (b) the excess of (i) the basic exclusion amount of the last deceased spouse of such surviving spouse, over (ii) the amount with respect to which the tentative tax is determined under section 2001(b)(1) on the estate of such deceased spouse. A technical correction may be necessary to replace the reference to the basic exclusion amount of the last deceased spouse of the surviving spouse with a reference to the applicable exclusion amount of such last deceased spouse, so that the statute reflects intent. Applicable exclusion amount is defined in section 2010(c)(2), as amended by the provision.

2. Beginning on page 706, replace the entire **Appendix: The Estimated Budget Effects of Tax Legislation Enacted in the 111th Congress** with the attached revenue table. The Appendix printed in JCS-2-11 contains errors as a result of the printing process, including unreadable characters and an omission of an outlay from footnote 38 that necessitated moving footnote 38 (to become footnote 25 in the corrected revenue table) and renumbering footnotes 25 through 37. Due to formatting differences, the pagination of the corrected revenue table differs from the pagination of the revenue table printed in JCS-2-11.

**APPENDIX:  
ESTIMATED BUDGET EFFECTS OF TAX LEGISLATION ENACTED IN THE 111TH CONGRESS**

**Fiscal Years 2009 - 2020**

*[Millions of Dollars]*

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
<b>PART ONE: THE CHILDREN'S HEALTH INSURANCE PROGRAM REAUTHORIZATION ACT OF 2009 (P.L. 111-3, signed into law by the President on February 4, 2009)</b>														
I. Requirements for Group Health Plans [1] [2].....	DOE	---	-150	-275	-325	-350	-375	-375	-425	-450	-475	---	---	-3,200
II. Other Revenue Provisions														
A. Increase in Excise Tax Rate on Tobacco Products and Cigarette Papers and Tubes [3]														
1. Small Cigars.....	ara 3/31/09	46	108	91	91	91	92	92	92	92	92	---	---	886
2. Large Cigars.....	ara 3/31/09	75	424	419	425	433	442	451	458	466	474	---	---	4,070
3. Cigarettes.....	ara 3/31/09	3,489	6,479	6,173	6,117	6,066	6,014	5,960	5,906	5,849	5,795	---	---	57,850
4. All other tobacco products.....	ara 3/31/09	145	307	289	286	285	283	281	279	276	274	---	---	2,705
B. Modify Definition of Roll-Your-Own Tobacco.....	ara 3/31/09	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	---	---	2
C. Permit, Reporting, and Recordkeeping Requirements for Manufacturers and Importers of Processed Tobacco.....														
	4/1/09	----- <i>Negligible Revenue Effect</i> -----												
D. Broaden Authority to Deny, Suspend, and Revoke Tobacco Permits.....														
	DOE	----- <i>Negligible Revenue Effect</i> -----												
E. Clarify Statute of Limitations Pertaining to Excise Taxes Imposed on Imported Alcohol, Tobacco Products, and Cigarette Papers and Tubes.....														
	aiiUSa DOE	----- <i>Negligible Revenue Effect</i> -----												
F. Impose Immediate Tax on Unlawfully Manufactured Tobacco Products and Cigarette Papers and Tubes.....														
	DOE	----- <i>Negligible Revenue Effect</i> -----												
G. Use of Tax Information in Tobacco Transition Payment Assessments [5].....														
	DOE	[4]	1	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	---	---	2
H. Study Concerning Magnitude of Tobacco Smuggling in the United States.....														
	[6]	----- <i>No Revenue Effect</i> -----												
I. Modify Timing for Corporate Estimated Tax Payment [7] .....														
	DOE	---	---	---	---	302	-302	---	---	---	---	---	---	---
<b>TOTAL OF PART ONE.....</b>		<b>3,755</b>	<b>7,169</b>	<b>6,697</b>	<b>6,594</b>	<b>6,827</b>	<b>6,154</b>	<b>6,409</b>	<b>6,310</b>	<b>6,233</b>	<b>6,160</b>	<b>---</b>	<b>---</b>	<b>62,315</b>

706

**PART TWO: THE AMERICAN RECOVERY AND REINVESTMENT TAX ACT OF 2009 (P.L. 111-5, signed into law by the President on February 17, 2009)**

I. Tax Provisions

A. Tax Relief for Individuals and Families

1. Making Work Pay Credit - credit of 6.2% of earned income up to a maximum of \$400 single (\$800 joint) for tax years 2009 and 2010; phaseout for taxpayers with modified AGI in excess of \$75,000 (\$150,000 joint); and treatment of the U.S. Possessions [8].....

tyba 12/31/08 -19,900 -66,133 -30,166 --- --- --- --- --- --- --- --- -116,199

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
2. \$250 Refundable Credit for Federal and State Pensioners not Eligible for Social Security Benefits for Tax Year 2009 [9] [10].....	tyba 12/31/08	-44	-174	---	---	---	---	---	---	---	---	---	---	-218
3. Temporary increase in earned income tax credit for taxable years 2009 and 2010.....	tyba 12/31/08	-23	-2,349	-2,291	---	---	---	---	---	---	---	---	---	-4,663
4. Temporarily reduce the earnings threshold for the refundable portion of the child tax credit for taxable years 2009 and 2010 to \$3,000.....	tyba 12/31/08	[11]	-7,489	-7,342	---	---	---	---	---	---	---	---	---	-14,830
5. American Opportunity Tax Credit														
a. Amend the HOPE scholarship credit for taxable years 2009 and 2010 so that it is available for four years at a rate of 100% of first \$2,000 of expenses and 25% of next \$2,000; phaseout for taxpayers with modified AGI between \$80,000 - \$90,000 (\$160,000- \$180,000 joint); make textbooks a qualifying expense; allow against the AMT [9]....	tyba 12/31/08	-791	-4,425	-5,040	---	---	---	---	---	---	---	---	---	-10,256
b. Make 40% of the allowable American Opportunity Tax Credit refundable; and treatment of the U.S. Possessions [9] .....	tyba 12/31/08	-331	-1,725	-1,595	---	---	---	---	---	---	---	---	---	-3,651
6. Temporarily allow computer technology and equipment as a qualified higher education expense for qualified tuition programs for 2009 and 2010.....	epoia 12/31/08	[11]	[11]	[11]	-1	-1	-1	-1	-1	-1	-1	-1	---	-6
7. Extension of first-time homebuyer credit; increase maximum credit to \$8,000; waiver of requirement to repay first-time homebuyer credit unless home is sold within 36 months of purchase (sunset 11/30/09).....	qhpa 12/31/08	-1,115	-3,261	235	38	-102	-680	-597	-514	-384	-164	-94	---	-6,638
8. Grants to States for low-income housing projects in lieu of low-income housing credit allocations for 2009 [12].....	DOE	-3,006	28	150	309	350	350	350	350	350	350	350	---	-69
9. Provide that certain Federal grant monies do not reduce basis for purposes of determining the applicable low-income housing tax credit for such building [10].....	DOE	-1	-3	-8	-12	-14	-16	-17	-18	-18	-18	-18	---	-143
10. Exclude up to \$2,400 of unemployment insurance benefits from gross income for taxable year 2009.....	tyba 12/31/08	-948	-3,792	---	---	---	---	---	---	---	---	---	---	-4,740
11. Sales tax deduction for purchase (up to \$49,500) of new cars, light trucks, motorcycles, and motor homes; phaseout for taxpayers with modified AGI in excess of \$125,000 (\$250,000 joint) (sunset 12/31/09).....	po/a DOE	-424	-1,269	9	---	---	---	---	---	---	---	---	---	-1,684
12. Increase individual AMT exemption amount to \$46,700 (\$70,950 joint) and allow personal credits against the AMT (sunset 12/31/09).....	tyba 12/31/08	-2,054	-82,720	15,015	---	---	---	---	---	---	---	---	---	-69,759
B. Tax Incentives for Business														
1. Special allowance for certain property acquired during 2009:														
a. One-year extension of special allowance.....	ppisa 12/31/08	-23,503	-14,301	8,047	6,501	5,574	4,553	3,046	1,941	1,217	929	922	---	-5,074
b. One-year extension of election to accelerate AMT and R&E credits in lieu of bonus depreciation.....	tyea 12/31/08	-20	-984	49	47	33	21	15	10	8	8	8	---	-805

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
2. One-year extension of temporary increase in limitation on expensing of certain depreciable business assets.....	tyba 12/31/08	-642	-425	352	222	162	125	79	45	22	10	10	---	-41
3. 5-year carryback of 2008 NOLs for businesses with gross receipts of \$15 million or less.....	[13]	-4,741	708	753	648	486	365	274	205	154	115	87	---	-947
4. Reduce required estimated tax payments in 2009 for certain small businesses.....	tybi 2009	-275	275	---	---	---	---	---	---	---	---	---	---	---
5. Modification of the work opportunity tax credit - incentives to hire unemployed veterans and disconnected youth.....	iwbwa 12/31/08 & [14]	-32	-81	-70	-28	-11	-6	-2	[11]	---	---	---	---	-231
6. Clarification of regulations related to limitations on certain built-in losses following an ownership change.....	DOE	1,437	1,775	646	261	225	304	419	457	470	484	499	---	6,977
7. Treatment of certain ownership changes of manufacturing firms for purposes of limitation on net operating loss carryforwards and certain built-in losses.....	oca DOE	---	---	-19	-19	-181	-289	-289	-491	-625	-625	-625	---	-3,163
8. Deferral and ratable inclusion of income arising from business indebtedness discharged by the reacquisition of a debt instrument, and temporary AHYDO exception for debt exchange or modification.....	ra 12/31/08 & before 1/1/11; [15]	-12,113	-22,803	-7,479	-483	-269	4,948	8,349	8,328	8,306	8,285	3,310	---	-1,622
9. Special rules applicable to qualified small business stock for 2009 and 2010.....	saa DOE	2	6	2	---	---	-207	-360	-163	-50	-36	-22	---	-829
10. Temporarily reduce the S corporation built-in gains holding period from 10 to 7 years.....	tyba 12/31/08 and before 1/1/11	-31	-154	-73	-32	-28	-19	-20	-16	-14	-13	-15	---	-415
<b>C. Fiscal Relief for State and Local Governments</b>														
1. Modification of rules applicable to financial institutions for interest expense relating to tax-exempt income.....	oia 12/31/08 & before 1/1/11	-79	-239	-326	-340	-336	-331	-326	-321	-317	-312	-307	---	-3,234
2. For bonds issued during 2009 and 2010, suspend alternative minimum tax limitations on private-activity tax-exempt bonds and modify ACE to exclude interest from all tax-exempt bonds; and provide AMT relief for current refundings of certain private activity bonds during 2009 and 2010 (refundings of private activity bonds issued since 1/1/04).....	oia 12/31/08	-27	-69	-76	-49	-49	-49	-49	-48	-47	-46	-46	---	-555
3. For bonds issued in 2009 and 2010, expand industrial development bonds to include creation of intangible property and eliminate 25% of proceeds restriction for facilities functionally related and subordinate to a manufacturing facility...	oia DOE & before 1/1/11	-1	-6	-16	-23	-24	-23	-23	-23	-22	-22	-21	---	-203
4. Qualified school construction bonds (\$1.1 billion in 2009 and 2010).....	oia DOE	-19	-110	-315	-611	-918	-1,179	-1,345	-1,390	-1,362	-1,325	-1,303	---	-9,877
5. Extend and expand qualified zone academy bonds (\$1.4 billion in 2009 and 2010).....	oia 12/31/08	-1	-10	-40	-90	-130	-140	-137	-131	-125	-121	-120	---	-1,045
6. Build America Bonds - general rule: 35% credit to bondholders for bonds issued in 2009 and 2010 35% refundable credit to issuers for bonds issued 2009 and 2010.....	oia DOE	-53	-323	-506	-495	-475	-455	-436	-417	-406	-396	-386	---	-4,348

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
7. Recovery zone bonds (\$15 billion private activity bond allocation; \$10 billion allocation for refundable issuer credit bonds, credit rate 45%).....	oia DOE & before 1/1/11	-175	-313	-503	-565	-568	-561	-554	-545	-537	-529	-521	---	-5,371
8. Tribal economic development bonds - create a national pool of tax-exempt bonds for use by Indian tribes for economic development (\$2 billion allocation).....	oia DOE	-1	-4	-15	-31	-39	-39	-39	-38	-37	-36	-36	---	-315
9. Specify treatment of tax-credit bonds held by regulated investment companies.....	tyea DOE	----- No Revenue Effect -----												
10. Delay 3% withholding on government contracts by one year.....	DOE	---	---	-5,819	5,528	---	---	---	---	---	---	---	---	-291
11. Extend and modify the new markets tax credit - increase new markets tax credit equity limitation to a total of \$5 billion for calendar years 2008 and 2009.....	DOE	-51	-31	-48	-103	-115	-138	-131	-117	-86	---	4	---	-815
<b>D. Energy Incentives</b>														
1. Extend by three years the placed-in-service date for each section 45 qualified facility, (two years for marine renewables), excluding coal and solar facilities.....	ppisa 12/31/09 & 12/31/10	---	-127	-440	-921	-1,365	-1,603	-1,649	-1,700	-1,743	-1,788	-1,806	---	-13,143
2. Election of investment credit for section 45 facilities in lieu of production credits.....	ppisa 12/31/08	-96	-131	-71	-16	9	12	6	2	1	1	---	---	-285
3. Modify section 48 energy credit - remove cap for small wind systems, and remove cutback to credit for subsidized energy financing.....	pa 12/31/08	-31	-33	-42	-50	-59	-71	-87	-104	-66	-32	-26	---	-604
4. Grants for specified energy property in lieu of tax credits [12].....	ppisa 12/31/08 & before 1/1/11	-27	-77	-18	41	41	27	8	---	---	---	---	---	-5
5. Increased limitation on issuance of new clean renewable energy bonds (\$1.6 billion additional allocation).....	DOE	-1	-4	-15	-36	-59	-73	-78	-78	-78	-78	-78	---	-578
6. Increased limitation on issuance of qualified energy conservation bonds (\$2.4 billion additional allocation); and clarify green community programs for purposes of loans, grants and other repayment mechanisms.....	DOE	-1	-5	-17	-41	-69	-95	-111	-116	-116	-116	-116	---	-803
7. Modify speed requirement for high-speed rail exempt facility bonds.....	oia DOE	[11]	-1	-3	-7	-13	-20	-29	-38	-48	-58	-71	---	-288
8. Extension and temporary increase to 30% (\$1,500 per residence cap) credit for all section 25C nonbusiness energy property, repeal reduction in section 25C credits by reason of receipt of subsidized energy financing, and modify definition of qualified energy property and wood stoves (sunset 12/31/10).....	tyba 12/31/08 [16]	-186	-1,006	-842	---	---	---	---	---	---	---	---	---	-2,034
9. Credit for residential energy efficient property - remove credit cap for residential wind, geothermal property, and residential solar thermal property under section 25D, repeal reduction in all section 25D credits (residential solar, geothermal, wind, fuel cells) by reason of receipt of subsidized energy.....	tyba 12/31/08	-7	-29	-30	-32	-33	-34	-36	-37	-28	---	---	---	-268

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
10. Temporarily increase credit rate for nonhydrogen refueling property to 50%; increase max credit to \$50,000 for business property (\$200,000 in the case of hydrogen) and \$2,000 for nonbusiness property (sunset 12/31/10).....	tyba 12/31/08	-11	-21	-14	-6	-4	-2	1	1	1	1	1	---	-54
11. Modify carbon dioxide sequestration credit to require permanent geologic storage for CO2 used as a tertiary injectant.....	DOE	----- <i>Negligible Revenue Effect</i> -----												
12. Modification of the alternative motor vehicle credit and the credit for qualified plug-in electric drive motor vehicles.....	generally DOE [17]	-3	-20	-39	-74	-39	4	-85	-232	-383	-540	-589	---	-2,002
13. Credit for plug-in electric vehicle conversion (sunset 12/31/11).....	ppisa DOE	----- <i>Estimate Included in C.12.</i> -----												
14. Treatment of alternative motor vehicle credit as a personal credit allowed against AMT.....	tyba 12/31/08	----- <i>Estimate Included in C.12.</i> -----												
15. Equalize tax-free transit and parking benefits, set both at \$230 for 2009 and then index equally in 2010.....	mbo/a DOE	-57	-106	-29	---	---	---	---	---	---	---	---	---	-192
16. Credit for investment in advanced energy property (\$2.3 billion of credits to allocate).....	ppisa DOE	---	-168	-281	-319	-193	-152	-159	-152	-126	-72	-26	---	-1,647
<b>E. Other Provisions</b>														
1. Prohibition on Collection of Certain Payments Made Under the Continued Dumping and Subsidy Offset Act of 2000 [5] [10].....	DOE	-10	-30	-30	-10	-10	---	---	---	---	---	---	---	-90
2. Economic Recovery Payments to Certain Individuals - economic recovery payments to recipients of Social Security, supplemental security income, railroad retirement benefits, and veterans disability compensation or pension benefits [5] [10].....	DOE	-14,041	-169	-15	---	---	---	---	---	---	---	---	---	-14,225
<b>III. Health Insurance Assistance</b>														
A. Premium Assistance for COBRA Continuation Coverage for Unemployed Workers and Their Families - 65% subsidy for up to 9 months; phased out for taxpayers with AGI above \$125,000 single (\$250,000 joint) [18] [19].....	[20]	-14,302	-9,154	-1,407	26	75	46	29	10	1	---	---	---	-24,677
B. Modifications to Health Coverage Tax Credit, including increase to 80% (sunset 12/31/10) [21].....	generally DOE	-108	-267	-80	-1	---	---	---	---	---	---	---	---	-457
<b>TOTAL OF PART TWO.....</b>		<b>-97,843</b>	<b>-221,749</b>	<b>-39,862</b>	<b>9,226</b>	<b>1,851</b>	<b>4,572</b>	<b>6,016</b>	<b>4,659</b>	<b>3,911</b>	<b>3,855</b>	<b>-1,036</b>	<b>---</b>	<b>-326,412</b>

**PART THREE: AIRPORT AND AIRWAY TRUST**  
**FUND EXTENSIONS (P.L. 111-12, signed into law by the President on March 30, 2009; P.L. 111-69, signed into law by the President on October 1, 2009; P.L. 111-116, signed into law by the President on December 16, 2009; P.L. 111-153, signed into law by the President on March 31, 2010; P.L. 111-161, signed into law by the President on April 30, 2010; P.L. 111-197, signed into law by the President on July 2, 2010; P.L. 111-216, signed into law by the President on August 1, 2010; P.L. 11-249, signed into law by the President on September 30, 2010; and P.L. 111-329, signed into law by the President on December 22, 2010).....**

DOE ----- *No Revenue Effect* -----

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
<b>PART FOUR: THE HIGHWAY TRUST FUND</b>														
<b>PURPOSES (P.L. 111-46, signed into law by the President on August 7, 2009; P.L. 111-68, signed into law by the President on October 1, 2009; P.L. 111-118, signed into law by the President on December 19, 2009; P.L. 111-144, signed into law by the President on March 2, 2010; P.L. 111-147, signed into law by the President on March 18, 2010; and P.L. 111-322 signed into law by the President on December 22, 2010).....</b>														
	various	----- <i>No Revenue Effect</i> -----												
<b>PART FIVE: THE WORKER, HOMEOWNERSHIP, AND BUSINESS ASSISTANCE ACT OF 2009 (P.L. 111-92, signed into law by the President on November 6, 2009)</b>														
A. Extension and Modification of First-Time Homebuyer Credit (sunset 4/30/10).....	[22]	---	-9,960	-2,755	678	668	473	30	24	11	4	3	---	-10,823
B. Increase Carryback Period to Five Years for Net Operating Losses Arising in Either 2008 or 2009.....	[23]	---	-33,197	5,870	5,202	3,808	2,673	1,877	1,319	928	653	461	---	-10,407
C. Exclude From Gross Income Qualified Military Base Realignment and Closure Fringe.....	pma 2/17/09	---	-119	-41	-15	-12	-11	-11	-8	-8	-8	-9	---	-243
D. Delay in Application of Worldwide Allocation of Interest Until 2018.....	tyba 12/31/10	---	---	494	1,362	3,077	3,200	3,328	3,361	3,475	1,826	---	---	20,123
E. Modification of Penalty for Failure to File Partnership or S Corporation Returns														
1. Increase the penalty for failure to file partnership return by \$106 to \$195.....	tyba 12/31/09	---	---	---	2	39	92	95	98	102	105	109	---	642
2. Increase the penalty for failure to file an S Corporation return by \$106 to \$195.....	tyba 12/31/09	---	---	---	2	36	84	87	90	93	96	99	---	587
F. Expansion of Electronic Filing by Return Preparers.....	rfa 12/31/10	----- <i>Negligible Revenue Effect</i> -----												
G. Increase the Required Corporate Estimated Tax Payments Factor for Corporations with Assets of at Least \$1 Billion for Payments Due in July, August, and September 2014 by 33 Percentage Points.....	DOE	---	---	---	---	---	18,298	-18,298	---	---	---	---	---	---
<b>TOTAL OF PART FIVE.....</b>		---	<b>-43,276</b>	<b>3,568</b>	<b>7,231</b>	<b>7,616</b>	<b>24,809</b>	<b>-12,892</b>	<b>4,884</b>	<b>4,601</b>	<b>2,676</b>	<b>663</b>	---	<b>-121</b>
<b>PART SIX: HAITI TAX RELIEF - ACCELERATE THE INCOME TAX BENEFITS FOR CHARITABLE CASH CONTRIBUTIONS FOR THE RELIEF OF VICTIMS OF EARTHQUAKE IN HAITI (P.L. 111-126, signed into law by the President on January 22, 2010).....</b>														
	cma 1/11/10 & before 3/1/20	----- <i>Loss of Less Than \$2 Million</i> -----												
<b>PART SEVEN: THE HIRING INCENTIVES TO RESTORE EMPLOYMENT ACT (P.L. 111-147, signed into law by the President on March 18, 2010)</b>														
A. Incentives for Hiring and Retaining Unemployed Workers														
1. Payroll tax forgiveness for hiring unemployed workers (sunset 12/31/10) [24].....	wpa DOE	---	-4,184	-3,432	---	---	---	---	---	---	---	---	---	-7,616
2. Business credit for retention of certain newly hired individuals in 2010.....	wpa DOE	---	---	-2,169	-2,467	-428	-196	-114	-49	---	---	---	---	-5,422
B. Expensing - Increase in Expensing of Certain Depreciable Business Assets (sunset 12/31/10).....	tyba 12/31/09	---	-556	-368	305	192	140	108	68	39	19	9	8	-35

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
C. Qualified Tax Credit Bonds - Allow a Refundable Credit to the Issuers of Qualified Zone Academy Bonds, Qualified School Construction Bonds, New Clean Renewable Energy Bonds, and Qualified Energy Credit Bonds (Refundable at 100% of Applicable Tax Credit Bond Rate) [25].....	bia DOE	---	-81	-559	-813	-895	-713	-550	-393	-260	-159	-81	-57	-4,561
D. Revenue Provisions Contained in Extension of Current Surface Transportation Programs - Extend Highway Trust Fund (sunset 12/31/10), Provide for Interest and Certain Fund Transfers [26].....	DOE	----- <i>No Revenue Effect</i> -----												
E. Offset Provisions														
1. Foreign account tax compliance.....	various	---	343	448	710	769	804	840	878	917	958	1,001	1046	8,714
2. Delay implementation of worldwide interest allocation until 2021.....	tyba 12/31/17	---	---	---	---	---	---	12	97	131	1,897	3,811	3,963	9,911
3. Increase the required corporate estimated tax payments due in July, August, and September 2014 to 157.75% of the payment otherwise due for corporations with assets of at least \$1 billion [27].....	DOE	---	---	---	---	---	13,611	-13,611	---	---	---	---	---	---
4. Increase the required corporate estimated tax payments due in July, August, and September 2015 to 121.5% of the payment otherwise due for corporations with assets of at least \$1 billion.....	DOE	---	---	---	---	---	---	13,267	-13,267	---	---	---	---	---
5. Increase the required corporate estimated tax payments due in July, August, and September 2019 to 106.5% of the payment otherwise due for corporations with assets of at least \$1 billion.....	DOE	---	---	---	---	---	---	---	---	---	---	4,428	-4,428	---
<b>TOTAL OF PART SEVEN.....</b>		---	<b>-4,478</b>	<b>-6,080</b>	<b>-2,265</b>	<b>-362</b>	<b>13,646</b>	<b>-48</b>	<b>-12,666</b>	<b>827</b>	<b>2,715</b>	<b>9,168</b>	<b>532</b>	<b>991</b>

**PART EIGHT: HEALTH CARE PROVISIONS**

**I. THE PATIENT PROTECTION AND AFFORDABLE CARE ACT (P.L. 111-148 signed into law by the President on March 23, 2010) IN COMBINATION WITH THE HEALTH CARE AND EDUCATION RECONCILIATION ACT OF 2010 (P.L. 111-152, signed into law by the President on March 30, 2010) THE PATIENT PROTECTION AND AFFORDABLE CARE ACT**

**Title I. Quality, Affordable Health Care for All Americans**

1. Tax exemption for certain member-run health insurance issuers.....	DOE	----- <i>Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28]</i> -----												
2. Tax exemption for entities established pursuant to transitional reinsurance program for individual market in each State.....	DOE	----- <i>Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28]</i> -----												
3. Refundable tax credit providing premium assistance for coverage under a qualified health plan.....	tyea 12/31/13	---	---	---	---	---	-5,000	-11,000	-18,000	-22,000	-24,000	-26,000	---	-107,000
4. Reduced cost-sharing for individuals enrolling in qualified health plans.....	DOE	----- <i>Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28]</i> -----												
5. Disclosures to carry out eligibility requirements for certain programs.....	DOE	----- <i>Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28]</i> -----												

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
6. Premium tax credit and cost-sharing reduction payments disregarded for Federal and federally assisted programs.....	DOE	----- Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28] -----												
7. Small business tax credit.....	tyba 12/31/09	---	-2,000	-4,000	-5,000	-6,000	-5,000	-4,000	-3,000	-3,000	-4,000	-4,000	---	-40,000
8. Excise tax on individuals without essential health benefits coverage.....	tyba 12/31/13	---	---	---	---	---	---	2,000	3,000	4,000	4,000	4,000	---	17,000
9. Reporting of health insurance coverage.....	cyba 2013	----- Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28] -----												
10. Shared responsibility for employers.....	mba 12/31/13	---	---	---	---	---	3,000	8,000	10,000	10,000	10,000	11,000	---	52,000
11. Reporting of employer health insurance coverage.....	pba 12/31/13	----- Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28] -----												
12. Offering of qualified health plans through cafeteria plans.....	tyba 12/31/13	----- Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28] -----												
13. Conforming amendments.....	DOE	----- Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28] -----												
Title III. Improving the Quality and Efficiency of Health Care														
1. Disclosures to carry out the reduction of Medicare Part D subsidies for high income beneficiaries.....	DOE	----- Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28] -----												
Title VI. Transparency and Program Integrity														
1. Impose Fee on Insured and Self-Insured Health Plans; Patient- Centered Outcomes Research Trust Fund.....	[29]	---	---	---	---	110	267	325	360	418	512	659	---	2,649
Title IX. Revenue Provisions														
1. 40% excise tax on health coverage in excess of \$10,200/\$27,500 (subject to adjustment for unexpected increase in medical costs prior to effective date) and increased thresholds of \$1,650/\$3,450 for over age 55 retirees or certain high-risk professions, both indexed for inflation by CPI-U plus 1%; adjustment based on age and gender profile of employees; vision and dental excluded from excise tax; levied at insurer level; employer aggregates and issues information return for insurers indicating amount subject to the excise tax; nondeductible [30].....	tyba 12/31/17	---	---	---	---	---	---	---	---	---	12,200	19,800	---	32,000
2. Employer W-2 reporting of value of health benefits.....	tyba 12/31/10	----- Negligible Revenue Effect -----												
3. Conform the definition of medical expenses for health savings accounts, Archer MSAs, health flexible spending arrangements, and health reimbursement arrangements to the definition of the itemized deduction for medical expenses (excluding over-the-counter medicines prescribed by a physician).....	eia 12/31/10	---	---	400	600	600	600	600	600	600	600	600	---	5,000
4. Increase in additional tax on distributions from HSAs and Archer MSAs not used for qualified medical expenses to 20%.....	dma 12/31/10	---	---	[31]	[31]	100	100	100	200	200	300	300	---	1,400
5. Limit health flexible spending arrangements in cafeteria plans to \$2,500; indexed to CPI-U after 2013 [30] [32].....	tyba 12/31/12	---	---	---	---	1,500	2,100	2,100	2,000	1,900	1,700	1,700	---	13,000
6. Require information reporting on payments to corporations.....	pma 12/31/11	---	---	---	400	3,300	2,000	2,100	2,200	2,300	2,400	2,500	---	17,100
7. Additional requirements for section 501(c)(3) hospitals.....	tyba DOE	----- Negligible Revenue Effect -----												

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
8. Impose annual fee on manufacturers and importers of branded drugs (\$2.5 billion for 2011, \$2.8 billion per year for 2012 and 2013, \$3.0 billion per year for 2014 through 2016, \$4.0 billion for 2017, \$4.1 billion for 2018, and \$2.8 billion for 2019 and thereafter) [30].....	cyba 12/31/10	---	---	2,200	2,900	2,900	2,900	2,900	2,900	3,400	4,000	2,900	---	27,000
9. Impose annual fee on manufacturers and importers of certain medical devices (\$2 billion per year for 2011 through 2017; and \$3 billion per year thereafter).....	DOE	----- <i>Provision Repealed by Enactment of the "Health Care Education Reconciliation Act of 2010"</i> -----												
10. Impose annual fee on health insurance providers (\$8 billion in 2014, \$11.3 billion in 2015 and 2016, \$13.9 billion in 2017, \$14.3 billion in 2018, and indexed to medical cost growth thereafter) [30].....	[33]	---	---	---	---	---	6,100	9,300	9,500	11,400	11,700	12,100	---	60,100
11. Study and report of effect on veterans health care.....	DOE	----- <i>No Revenue Effect</i> -----												
12. Eliminate deduction for expenses allocable to Medicare Part D subsidy [30].....	tyba 12/31/12	---	---	---	---	400	600	600	600	700	700	800	---	4,500
13. Raise 7.5% AGI floor on medical expenses deduction to 10%; AGI floor for individuals age 65 and older (and their spouses) remains at 7.5% through 2016.....	tyba 12/31/12	---	---	---	---	400	1,500	1,600	1,700	2,500	3,700	3,900	---	15,200
14. \$500,000 deduction limitation on taxable year remuneration to officers, employees, directors, and service providers of covered health insurance providers.....	[34]	---	---	---	---	100	100	100	100	100	100	100	---	600
15. Broaden Medicare Hospital Insurance Tax Base for High-Income Taxpayers - additional HI tax of 0.9% on earned income in excess of \$200,000/\$250,000 (unindexed).....	tyba 12/31/12	---	---	---	---	13,300	6,000	10,400	13,100	14,100	14,700	15,200	---	86,800
16. Modification of section 833 treatment of certain health organizations.....	tyba 12/31/09	---	[31]	100	100	[31]	[31]	[31]	[31]	[31]	[31]	[31]	---	400
17. Impose 10% excise tax on indoor tanning services.....	tspo/a 7/1/10	---	[31]	200	200	300	300	300	300	300	300	300	---	2,700
18. Provide income exclusion for specified Indian tribe health benefits.....	[35]	---	---	[36]	[36]	[36]	[36]	[36]	[36]	[36]	[36]	[36]	---	[36]
19. Simple cafeteria plan nondiscrimination safe harbor for certain small employers.....	tyba 12/31/10	----- <i>Negligible Revenue Effect</i> -----												
20. Qualifying therapeutic discovery project credit (sunset 12/31/10).....	[37]	---	-400	-200	-100	-100	[36]	[36]	---	---	---	---	---	-900
Title X. Strengthening Quality, Affordable Health Care for All Americans														
1. Study of geographic variation in application of FPL.....	DOE	----- <i>No Revenue Effect</i> -----												
2. Free choice vouchers.....	after 12/31/13	----- <i>Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28]</i> -----												
3. Exclusion for assistance provided to participants in State student loan repayment programs for certain health professionals.....	tyba 12/31/08	---	[36]	[36]	[36]	[36]	[36]	[36]	[36]	[36]	[36]	[36]	---	-100
4. Make the adoption credit refundable; increase qualifying expenses threshold, and extend the adoption credit through 2011.....	tyba 12/31/09	---	-168	-586	-452	[31]	---	---	---	---	---	---	---	-1,206
THE HEALTH CARE AND EDUCATION RECONCILIATION ACT OF 2010														
1. Adult dependents.....	DOE	----- <i>Estimate Provided by the Congressional Budget Office in Collaboration with the Joint Committee on Taxation [28]</i> -----												

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
2. Unearned Income Medicare Contribution on 3.8% on investment income for taxpayers with AGI in excess of \$200,000/\$250,000 (unindexed).....	tyba 12/31/12	---	---	---	1,300	7,200	10,600	18,900	19,600	20,700	21,900	23,300	---	123,400
3. Impose 2.3% excise tax on manufacturers and importers of certain medical devices.....	sa 12/31/12	---	---	---	---	1,800	2,700	2,800	3,000	3,100	3,200	3,400	---	20,000
4. Exclusion of unprocessed fuels from the cellulosic biofuel producer credit.....	fsouo/a 1/1/10	---	---	6,600	6,500	5,500	3,000	1,500	400	---	---	---	---	23,600
5. Codify economic substance doctrine and impose penalties for underpayments.....	teia DOE	---	67	316	409	471	505	523	536	551	566	601	---	4,545
6. Increase by 15.75 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2014.....	DOE	---	---	---	---	---	8,800	-8,800	---	---	---	---	---	---
<b>II. CLARIFICATION THAT THE HEALTH CARE PROVIDED BY THE SECRETARY OF VETERANS AFFAIRS CONSTITUTES MINIMUM ESSENTIAL COVERAGE - (P.L. 111-173, signed into law by the President on May 27, 2010).....</b>														
	[38]	----- <i>No Revenue Effect</i> -----												
<b>III. MEDICARE AND MEDICAID EXTENDERS ACT OF 2010 - LIMITATIONS ON AGGREGATE AMOUNT RECOVERED ON RECONCILIATION OF THE HEALTH INSURANCE TAX CREDIT AND THE ADVANCE OF THAT CREDIT (P.L. 111-309, signed into law by the President on December 15, 2010) [1] [25].....</b>														
	tyba 12/31/13	---	---	---	---	---	546	1416	2425	3181	3533	3787	4106	18,995
<b>TOTAL OF PART EIGHT.....</b>		---	<b>-2,501</b>	<b>5,030</b>	<b>6,857</b>	<b>31,881</b>	<b>41,718</b>	<b>41,764</b>	<b>51,521</b>	<b>54,450</b>	<b>68,111</b>	<b>76,947</b>	<b>4,106</b>	<b>378,783</b>
<b>PART NINE: PRESERVATION OF ACCESS TO CARE FOR MEDICARE BENEFICIARIES AND PENSION RELIEF ACT OF 2010 COVERAGE (P.L. 111-192, signed into law by the President on June 25, 2010)</b>														
<b>A. Authority to Disclose Return Information Concerning Outstanding Tax Debts for Purposes of Enhancing Medicare Program Integrity [5] [25].....</b>														
	DOE	---	---	---	38	38	50	50	50	50	50	50	50	425
<b>B. Pension Funding Relief</b>														
1. Single-employer plans [39].....	various	---	110	777	1,595	1,524	859	468	239	-134	-1,006	-1,743	-1,380	1,309
2. Multiemployer plans [39].....	various	---	9	34	56	79	99	117	134	132	99	40	-2	797
<b>TOTAL OF PART NINE.....</b>		---	<b>119</b>	<b>811</b>	<b>1,689</b>	<b>1,641</b>	<b>1,008</b>	<b>635</b>	<b>423</b>	<b>48</b>	<b>-857</b>	<b>-1,653</b>	<b>-1,332</b>	<b>2,531</b>
<b>PART TEN: THE HOMEBUYER ASSISTANCE AND IMPROVEMENT ACT OF 2010 (P.L. 111-198, signed into law by the President on July 2, 2010)</b>														
<b>A. Extend the Time for Closing on a Principal Residence Eligible for the First-Time Homebuyer Credit (Sunset 9/30/10).....</b>														
	rpa 6/30/10	---	-26	-114	---	---	---	---	---	---	---	---	---	-140
<b>B. Revenue Offsets</b>														
1. Application of bad checks penalty to electronic payments.....	ita DOE	---	1	4	4	4	5	5	5	5	5	5	5	48
2. Disclosure of prisoner return information to State prisons [40].....	Dma DOE	---	[4]	[4]	[4]	1	1	1	1	1	1	1	1	6

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
3. Amendment of the Travel Promotion Act of 2009 [5] [10].....	DOE	---	6	-14	-6	23	7	120	-30	-10	---	---	---	95
<b>TOTAL OF PART TEN.....</b>		<b>---</b>	<b>-19</b>	<b>-124</b>	<b>-2</b>	<b>28</b>	<b>13</b>	<b>126</b>	<b>-24</b>	<b>-4</b>	<b>6</b>	<b>6</b>	<b>6</b>	<b>9</b>
<b>PART ELEVEN: THE DODD-FRANK WALL STREET REFORM AND CONSUMER PROTECTION ACT - CERTAIN SWAPS, ETC., NOT TREATED AS SECTION 1256 CONTRACTS (P.L. 111-203, signed into law by the President on July 21, 2010).....</b>														
	<b>tyba DOE</b>	<b>---</b>	<b>---</b>	<b>1</b>	<b>6</b>	<b>7</b>	<b>8</b>	<b>11</b>	<b>13</b>	<b>15</b>	<b>18</b>	<b>19</b>	<b>21</b>	<b>120</b>
<b>PART TWELVE: THE _____ ACT OF _____ (P.L. 111-226, signed into law by the President on August 10, 2010)</b>														
A. Rules to Prevent Splitting Foreign Tax Credits from the Income to Which They Relate.....	generally fitpoaa 12/31/10	---	---	170	240	375	390	575	600	550	500	450	400	4,250
B. Denial of Foreign Tax Credit With Respect to Foreign Income Not Subject to United States Taxation by Reason of Covered Asset Acquisitions.....	generally caaa 12/31/10	---	---	45	400	400	400	400	400	400	400	400	400	3,645
C. Separate Application of Foreign Tax Credit Limitation, etc., to Items Resourced Under Treaties.....	tyba DOE	---	---	25	25	25	25	25	25	25	25	25	25	250
D. Limitation on the Amount of Foreign Taxes Deemed Paid with Respect to Section 956 Inclusions.....	[41]	---	---	5	20	40	60	80	99	100	100	100	100	704
E. Special Rule with Respect to Certain Redemptions by Foreign Subsidiaries.....	aa DOE	---	---	25	25	25	25	25	25	25	25	25	25	250
F. Modification of Affiliation Rules for Purposes of Rules Allocating Interest Expense.....	tyba DOE	---	---	225	150	10	5	[4]	[4]	[4]	[4]	[4]	[4]	390
G. Termination of Special Rules for Interest and Dividends Received from Persons Meeting the 80% Foreign Business Requirements.....	generally tyba 12/31/10	---	---	1	2	6	9	12	15	21	25	29	33	153
H. Limitation on Extension of Statute of Limitations for Failure to Disclose Certain Foreign Transactions.....	[42]	---	----- <i>No Revenue Effect</i> -----											
I. Elimination of Advanced Refundability of Earned Income Credit .....	tyba 12/31/10	---	---	153	122	102	102	103	105	107	110	112	114	1,131
<b>TOTAL OF PART TWELVE.....</b>		<b>---</b>	<b>---</b>	<b>649</b>	<b>984</b>	<b>983</b>	<b>1,016</b>	<b>1,220</b>	<b>1,269</b>	<b>1,228</b>	<b>1,185</b>	<b>1,141</b>	<b>1,097</b>	<b>10,773</b>
<b>PART THIRTEEN: THE FIREARMS EXCISE TAX IMPROVEMENT ACT OF 2010 (P.L. 111-237, signed into law by the President on August 17, 2010)</b>														
A. Time For Payment Of Manufacturers' Excise Tax On Recreational Equipment [43].....	[44]	---	-82	31	29	10	5	1	1	1	[4]	[4]	[11]	-5
B. Assessment Of Certain Criminal Restitution.....	[45]	---	[4]	1	1	1	1	1	1	1	1	1	1	9
C. Increase by 0.25 Percentage Points the Required Corporate Estimated Tax Payments Factor for Corporations with Assets of at Least \$1 Billion for Payments Due in July, August, and September 2015.....	DOE	---	---	---	---	---	---	153	-153	---	---	---	---	---
<b>TOTAL OF PART THIRTEEN.....</b>		<b>---</b>	<b>-82</b>	<b>32</b>	<b>30</b>	<b>11</b>	<b>6</b>	<b>155</b>	<b>-151</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>4</b>

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
<b>PART FOURTEEN: THE SMALL BUSINESS JOBS ACT</b>														
<b>OF 2010 (P.L. 111-240, signed into law by the President on September 27, 2010)</b>														
<b>I. Small Business Relief</b>														
<b>A. Providing Access to Capital</b>														
1. Modification to exclusion for gain from certain small business stock (sunset 12/31/10).....	saa DOE	---	---	2	---	---	---	-276	-155	-34	-26	-17	-9	-518
2. Five-year carryback of general business credit of eligible small business (sunset 12/31/10).....	[46]	---	---	-1,440	241	192	180	156	144	132	114	96	78	-107
3. General business credits of eligible small business not subject to alternative minimum tax (sunset 12/31/10).....	[46]	---	---	-1,031	8	4	4	3	5	6	4	7	12	-977
4. Reduction in recognition period for built-in gains tax (sunset 12/31/11).....	tyba 12/31/10	---	---	-45	-23	-2	---	---	---	---	---	---	---	-70
<b>B. Encouraging Investment</b>														
1. Expand definition of eligible section 179 property to include certain real property and increase maximum amount and phase-out thresholds to \$500,000 and \$2,000,000, respectively.....	tyba 12/31/09 & before 1/1/12	---	---	-9,735	-3,024	3,441	2,280	1,705	1,291	838	509	302	215	-2,177
2. One-year extension of bonus depreciation.....	ppisa 12/31/09	---	---	-40,065	10,571	7,120	5,620	4,427	2,848	1,736	981	668	641	-5,454
3. Special rule for long-term contract accounting.....	ppisa 12/31/09	---	---	-1,785	751	463	276	163	82	38	12	---	---	---
<b>C. Promoting Entrepreneurship</b>														
1. Increase in amount allowed as a deduction for start-up expenditures.....	apoi tyba 12/31/09	---	---	-347	4	18	17	16	15	14	13	11	9	-230
<b>D. Promoting Small Business Fairness</b>														
1. Limitation on penalty for failure to disclose reportable transactions based on resulting tax benefits.....	paa 12/31/06	---	---	-85	-21	-16	-8	-8	-8	-8	-8	-8	-8	-176
2. Deduction for health insurance costs in computing self-employment taxes [47].....	tyba 12/31/09 & before 1/1/11	---	---	-1,754	-165	---	---	---	---	---	---	---	---	-1,919
3. Remove cellular telephones and similar telecommunications equipment from listed property.....	tyba 12/31/09	---	---	-29	-25	-31	-34	-38	-42	-46	-51	-55	-59	-410
<b>II. Revenue Provisions</b>														
<b>A. Reducing the Tax Gap</b>														
1. Require information reporting for rental property expense payments.....	pma 12/31/10	---	---	[48]	227	247	259	269	284	294	309	324	335	2,546
2. Increase penalties related to information returns and payee statements.....	rtbfo/a 1/1/11	---	---	30	41	42	42	43	43	43	44	45	47	421
3. Annual reports on certain penalties and other enforcement tools.....	DOE [49]	---	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----	-----
4. Application of continuous levy to tax liabilities of certain Federal contractors.....	lia DOE	---	---	127	98	100	102	104	106	108	110	112	114	1,080
<b>B. Promoting Retirement Preparation</b>														
1. Allow participants in governmental 457 plans to treat elective deferrals as Roth contributions.....	tyba 12/31/10	---	---	12	17	25	36	48	56	60	69	83	100	506
2. Allow rollovers from elective deferral plans to Roth designated accounts.....	da DOE	---	---	226	529	486	389	487	596	711	661	494	520	5,099
3. Permit partial annuitization of a nonqualified annuity contract.....	tyba 12/31/10	---	---	5	20	37	56	77	99	124	149	179	210	956

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
<b>C. Closing Unintended Loopholes</b>														
1. Crude oil ineligible for cellulosic biofuel producer credit.....	fsouo/a 1/1/10	---	---	523	512	425	237	118	34	---	---	---	---	1,849
2. Source rules for income on guarantees.....	gia DOE	---	---	200	200	200	200	200	200	200	200	200	200	2,000
<b>D. Increase by 36 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2015 [50].....</b>														
	DOE	---	---	---	---	---	---	21,234	-21,234	---	---	---	---	---
<b>TOTAL OF PART FOURTEEN.....</b>		---	---	<b>-55,191</b>	<b>9,961</b>	<b>12,751</b>	<b>9,656</b>	<b>28,728</b>	<b>-15,636</b>	<b>4,216</b>	<b>3,090</b>	<b>2,441</b>	<b>2,405</b>	<b>2,419</b>
<b>PART FIFTEEN: THE CLAIMS RESOLUTION ACT OF 2010 (P.L. 111-291, signed into law by the President on December 8, 2010)</b>														
A. The Individual Indian Money Account Litigation.....	DOE	---	----- <i>No Revenue Effect</i> -----											
B. Collection of Past-Due, Legally Enforceable State Debts [25] [51].....	[52]	---	---	---	1,308	960	211	7	-67	-60	-28	152	178	2,662
<b>TOTAL OF PART FIFTEEN.....</b>		---	---	---	<b>1,308</b>	<b>960</b>	<b>211</b>	<b>7</b>	<b>-67</b>	<b>-60</b>	<b>-28</b>	<b>152</b>	<b>178</b>	<b>2,662</b>
<b>PART SIXTEEN: THE TAX RELIEF, UNEMPLOYMENT INSURANCE REAUTHORIZATION, AND JOB CREATION ACT OF 2010 (P.L. 111-312, signed into law by the President on December 17, 2010)</b>														
<b>I. Temporary Extension of Tax Relief</b>														
<b>A. Marginal Individual Income Tax Rate Reductions</b>														
1. Retain 10% income tax bracket (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	-30,990	-44,807	-13,511	[11]	---	---	---	---	---	---	-89,308
2. Retain the 25% and the 28% income tax brackets (sunset 12/31/12).....	tyba 12/31/10	---	---	-12,792	-18,376	-5,526	[11]	---	---	---	---	---	---	-36,693
3. Retain the 33% and the 35% income tax brackets (sunset 12/31/12).....	tyba 12/31/10	---	---	-19,714	-31,276	-9,783	[11]	---	---	---	---	---	---	-60,774
B. Repeal Overall Limitation on Itemized Deduction and the Personal Exemption Phaseout (sunset 12/31/12).....	tyba 12/31/10	---	---	-4,862	-10,384	-5,489	[11]	---	---	---	---	---	---	-20,735
<b>C. Child Tax Credit - retain the child tax credit at \$1,000; refundable up to greater of 15% of earned income in excess of \$10,000 (indexed from 2001) or the taxpayer's social security tax liability to the extent that it exceeds the taxpayer's earned income credit; allow credit against the AMT; repeal AMT offset of refundable credits (sunset 12/31/12) [25]....</b>														
	tyba 12/31/10	---	---	-7,075	-35,565	-29,056	---	---	---	---	---	---	---	-71,697
<b>D. Marriage Penalty Relief and Earned Income Tax Credit Simplification</b>														
1. Standard deduction and 15% rate bracket set at 2 times single for married filing jointly (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	-6,287	-8,962	-2,686	[11]	---	---	---	---	---	---	-17,935

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
2. EIC modification and simplification - increase in joint returns beginning and ending income level for phaseout by \$3,000 indexed after 2008; simplify definition of earned income; use AGI instead of modified AGI; simplify definition of qualifying child and tie-breaker rules; and allow math error procedure with Federal Case registry data beginning in 2004 (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	-44	-4,424	-4,469	---	---	---	---	---	---	---	-8,937
E. Education Incentives														
1. Coverdell Education Savings Accounts ("ESAs") - increase the annual contribution limit to \$2,000; allow ESA contributions for special needs beneficiaries above the age of 18; allow corporations and other entities to contribute to ESAs; allow contributions until April 15 of the following year; allow a taxpayer to exclude ESA distributions from gross income and claim the HOPE or Lifetime Learning credits as long as they are not used for the same expenses; repeal excise tax on contributions made to ESA when contribution made by anyone on behalf of same beneficiary to QTP; modify phaseout range for married taxpayers; allow tax-free expenditures for elementary and secondary school expenses; expand the definition of qualified expenses to include certain computers and related items (sunset 12/31/12).....	tyba 12/31/10	---	---	-11	-17	-5	---	---	---	---	---	---	---	-32
2. Employer provided educational assistance - extend the exclusion for undergraduate courses and graduate level courses (sunset 12/31/12) [53].....	cba 12/31/10	---	---	-707	-964	-243	---	---	---	---	---	---	---	-1,914
3. Student loan interest deduction - eliminate the 60-month rule and the disallowance for voluntary payments; increase phaseout ranges to \$50,000-\$65,000 single/ \$100,000-\$130,000 joint, indexed for inflation (sunset 12/31/12).....	ipa 12/31/10	---	---	-63	-631	-560	---	---	---	---	---	---	---	-1,254
4. Eliminate the tax on awards under the National Health Service Corps Scholarship program and F. Edward Hebert Armed Forces Health Professions Scholarship and Financial Assistance Program (sunset 12/31/12).....	tyba 12/31/10	---	---	-9	-35	-27	---	---	---	---	---	---	---	-70
5. Increase arbitrage rebate exception for governmental bonds used to finance qualified school construction from \$10 million to \$15 million (sunset 12/31/12).....	bia 12/31/10	---	---	[11]	-1	-2	-3	-3	-3	-3	-3	-3	-3	-24
6. Issuance of tax-exempt private activity bonds for qualified education facilities with annual State volume caps the greater of \$10 per resident or \$5 million (sunset 12/31/12).....	bia 12/31/10	---	---	[11]	-1	-3	-5	-5	-5	-5	-5	-5	-5	-39

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
<b>F. Other Incentives for Families and Children</b>														
1. Dependent care tax credit - increase the credit rate to 35%, increase the eligible expenses to \$3,000 for one child and \$6,000 for two or more children (not indexed), and increase the start of the phase-out to \$15,000 of AGI (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	-76	-302	-222	---	---	---	---	---	---	---	-600
2. Adoption credit - increase the expense limit and the exclusion to \$10,000 for both non-special needs and special needs adoptions, make the credit independent of expenses for special needs adoptions, extend the credit and the exclusion, increase the phase-out start point to \$150,000, index for inflation the expenses limit and the phase-out start point for both the credit and the exclusion, and allow the credit to apply to the AMT (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	---	-95	-221	---	---	---	---	---	---	---	-315
3. Employer-provided child care credit of 25% for childcare expenditures and 10% for child care resource (sunset 12/31/12).....	tyba 12/31/10	---	---	-11	-33	-15	---	---	---	---	---	---	---	-58
<b>G. Allow Electing Alaska Native Settlement Trusts to Tax Income to the Trust not the Beneficiaries (sunset 12/31/12).....</b>	tyba 12/31/10	---	---	-2	-5	-2	---	---	---	---	---	---	---	-9
<b>H. Reduced Rate on Dividends and Capital Gains</b>														
1. Tax capital gains with a 0%/15% rate structure (sunset 12/31/12).....	tyba 12/31/10	---	---	-10,477	2,355	-1,915	-15,840	---	---	---	---	---	---	-25,877
2. Tax dividends with a 0%/15% rate structure (sunset 12/31/12).....	tyba 12/31/10	---	---	-4,677	-13,555	-9,042	---	---	---	---	---	---	---	-27,274
<b>I. Extension of American Opportunity Tax Credit (sunset 12/31/12) [25].....</b>	tyba 12/31/10	---	---	-1,194	-7,094	-9,277	---	---	---	---	---	---	---	-17,566
<b>J. Reduce the Earnings Threshold for the Refundable Portion of the Child Tax Credit to \$3,000 (sunset 12/31/12) [25].....</b>	tyba 12/31/10	---	---	---	-9,826	-9,917	---	---	---	---	---	---	---	-19,743
<b>K. Earned Income Credit</b>														
1. Increase in earned income tax credit percentage (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	-18	-1,845	-1,822	---	---	---	---	---	---	---	-3,685
2. EIC modification and simplification - increase in joint returns beginning and ending income level for phaseout by \$5,000 indexed after 2008 (sunset 12/31/12) [25].....	tyba 12/31/10	---	---	-16	-1,553	-1,532	---	---	---	---	---	---	---	-3,101
<b>II. Temporary Alternative Minimum Tax Relief - Set the AMT Exemption Amount at \$47,450 (\$72,450 Joint) in 2010 and \$48,450 (\$74,450 Joint) in 2011 and Allow Personal Credits against the AMT (sunset 12/31/11).....</b>	tyba 12/31/09	---	---	-85,833	-67,597	16,754	---	---	---	---	---	---	---	-136,676
<b>III. Temporary Estate and Gift Tax Relief - \$5 Million Unified and Indexed Exemption Amount; 35% Maximum Rate; Portability of Exemption Amount; and Decedents Dying in 2010 Can Elect into EGTRRA (sunset 12/31/12).....</b>	dda/gsta 12/31/09 & gma 12/31/10	---	---	-4,546	-28,050	-29,349	-3,483	-2,088	-981	-53	130	135	136	-68,149
<b>IV. Temporary Extension of Investment Incentives</b>														
A. Increase Additional First-Year Depreciation to 100 Percent (sunset 12/31/11); Extend 50 Percent Additional First-Year Depreciation for Property Placed in Service after 12/31/11 (sunset 12/31/12)....	ppisa 9/8/10	---	---	-55,419	-54,422	2,687	25,519	19,778	15,671	11,161	7,071	4,297	2,775	-20,883

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
B. Election To Accelerate AMT Credit in Lieu of Additional First-Year Depreciation (sunset 12/31/12).....	[54]	---	---	-11	-536	-212	37	29	19	13	9	7	6	-639
C. Section 179 Expensing Amounts and Threshold Limits \$125,000/ \$500,000 (sunset 12/31/12).....	tyba 12/31/11	---	---	---	-3,266	-2,160	1,791	1,131	822	636	401	227	110	-307
V. Temporary Extension of Unemployment Insurance and Related Matters [5] [25] [10].....	various	---	---	-34,515	-21,642	-100	-102	-76	-41	-29	-4	---	---	-56,510
VI. Temporary Payroll Tax Reduction (Employee Side of OASDI) by 2 Percentage Points (sunset 12/31/11) [55]....	tyba 12/31/10	---	---	-67,239	-44,414	---	---	---	---	---	---	---	---	-111,653
VII. Temporary Extension of Certain Expiring Provisions														
A. Energy														
1. Incentives for biodiesel and renewable diesel (sunset 12/31/11).....	fsoua 12/31/09	---	---	-1,677	-300	---	---	---	---	---	---	---	---	-1,977
2. Placed-in-service date for facilities eligible to claim the refined coal production credit (excluding steel industry fuel) (sec. 45(d)) (sunset 12/31/11).....	ppisa 12/31/09	---	---	-15	-20	-23	-24	-24	-24	-25	-26	-26	-24	-230
3. Credit for construction of energy efficient new homes (sunset 12/31/11).....	haa 12/31/09	---	---	-66	-25	-12	-11	-9	-8	-5	-1	---	---	-138
4. Incentives for alternative fuel and alternative fuel mixtures (modified to exclude black liquor) (sunset 12/31/11).....	fsoua 12/31/09	---	---	-176	-26	---	---	---	---	---	---	---	---	-202
5. Special rule to implement electric transmission restructuring (sunset 12/31/11).....	Da 12/31/09	---	---	-232	-92	51	51	51	51	51	51	18	---	---
6. Extension of suspension of 100 percent-of-net-income limitation on percentage depletion for oil and natural gas from marginal properties (sunset 12/31/11).....	tyba 12/31/09	---	---	-182	-42	---	---	---	---	---	---	---	---	-224
7. Grants for specified energy property in lieu of tax credits (sunset 12/31/11) [25].....	ppisa DOE	---	---	-1,941	-1,045	---	---	---	---	---	---	---	---	-2,987
8. Extension of provisions related to alcohol used as fuel (extension of present law):														
a. Extension of income tax credits for alcohol fuels; and extension of excise tax credits and outlay payments for alcohol fuel mixtures (sunset 12/31/11).....	pa 12/31/10 & saua 12/31/10	---	---	-3,558	-1,311	---	---	---	---	---	---	---	---	-4,869
b. Extension of additional duties on ethanol (sunset 12/31/11) [5].....	1/1/11	---	---	8	3	---	---	---	---	---	---	---	---	10
9. Credit for energy efficient appliances (sunset 12/31/11).....	apa 12/31/10	---	---	-7	-17	-14	-9	-8	-6	-5	-4	-4	-3	-78
10. Extension and modification of section 25C nonbusiness energy property (sunset 12/31/11).....	ppisa 12/31/10	---	---	-119	-477	---	---	---	---	---	---	---	---	-596
11. Alternative fuel vehicle refueling property (non-hydrogen refueling property) (sunset 12/31/11).....	ppisa 12/31/10	---	---	-7	-6	-2	-1	-1	[4]	[4]	[4]	[4]	[4]	-16
B. Individual Tax Relief														
1. Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/11).....	tyba 12/31/09	---	---	-39	-195	-156	---	---	---	---	---	---	---	-390
2. Deduction of State and local general sales taxes (sunset 12/31/11).....	tyba 12/31/09	---	---	-2,829	-2,393	-314	---	---	---	---	---	---	---	-5,536
3. Contributions of capital gain real property made for qualified conservation purposes (sunset 12/31/11)....	cmi tyba 12/31/09	---	---	-63	-48	---	---	---	---	---	---	---	---	-111
4. Deduction for qualified tuition and related expenses (sunset 12/31/11) [56].....	tyba 12/31/09	---	---	-711	-450	---	---	---	---	---	---	---	---	-1,161

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
5. Tax-free distributions from IRAs to certain public charities for individuals age 70 1/2 or older, not to exceed \$100,000 per taxpayer per year; distributions made in January 2011 may count against the 2010 \$100,000 limit and satisfy the 2010 minimum distribution requirement (sunset 12/31/11).....	dmi tyba 12/31/09	---	---	-517	-197	-29	-30	-31	-32	-34	-35	-36	-38	-979
6. Estate tax look-through for certain RIC stock held by nonresidents (sunset 12/31/11).....	dda 12/31/09	---	---	-5	-5	---	---	---	---	---	---	---	---	-10
7. Parity for exclusion for employer-provided mass transit and parking benefits (sunset 12/31/11) [1].....	ma 12/31/10	---	---	-102	-34	---	---	---	---	---	---	---	---	-136
8. Refunds disregarded in the administration of Federal programs and federally assisted programs (sunset 12/31/12) [5] [25].....	Ara 12/31/09	---	---	-4	-4	---	---	---	---	---	---	---	---	-8
<b>C. Business Tax Relief</b>														
1. Tax credit for research and experimentation expenses (sunset 12/31/11).....	apoa 12/31/09	---	---	-5,984	-2,055	-923	-813	-715	-631	-575	-547	-530	-501	-13,272
2. Indian employment tax credit (sunset 12/31/11).....	tyba 12/31/09	---	---	-59	-33	-9	-1	---	---	---	---	---	---	-102
3. New markets tax credit (\$3.5 billion allocation for 2010 and \$3.5 billion allocation for 2011) (sunset 12/31/11).....	cyba 12/31/09	---	---	-5	-29	-94	-180	-221	-252	-279	-288	-267	-194	-1,810
4. 50% tax credit for certain expenditures for maintaining railroad tracks (sunset 12/31/11).....	epoid tyba 12/31/09	---	---	-232	-99	[11]	---	---	---	---	---	---	---	-331
5. Mine rescue team training credit (sunset 12/31/11)...	tyba 12/31/09	---	---	-2	-1	-1	[11]	[11]	[11]	---	---	---	---	-5
6. Employer wage credit for activated military reservists (sunset 12/31/11).....	pma 12/31/09	---	---	-2	-1	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	-3
7. 15-year straight-line cost recovery for qualified leasehold, restaurant, and retail improvements and new restaurants (sunset 12/31/11).....	ppisa 12/31/09	---	---	-281	-359	-397	-395	-389	-385	-380	-369	-350	-324	-3,629
8. 7-year recovery period for certain motorsports racing track facilities (sunset 12/31/11).....	ppisa 12/31/09	---	---	-40	-3	-1	---	---	-1	1	3	3	3	-36
9. Accelerated depreciation for business property on Indian reservations (sunset 12/31/11).....	ppisa 12/31/09	---	---	-98	-23	5	17	27	22	12	1	-2	-1	-41
10. Enhanced charitable deduction for contributions of food inventory (sunset 12/31/11).....	cma 12/31/09	---	---	-92	-42	---	---	---	---	---	---	---	---	-134
11. Enhanced charitable deduction for contributions of book inventories to public schools (sunset 12/31/11).....	cma 12/31/09	---	---	-37	-16	---	---	---	---	---	---	---	---	-53
12. Enhanced charitable deduction for corporate contributions of computer inventory for educational purposes (sunset 12/31/11).....	cmd tyba 12/31/09	---	---	-245	-105	---	---	---	---	---	---	---	---	-350
13. Election to expense mine safety equipment (sunset 12/31/11).....	ppisa 12/31/09	---	---	-20	1	5	4	3	3	2	1	[4]	---	-1
14. Special expensing rules for certain film and television productions (sunset 12/31/11).....	qfatpca 12/31/09	---	---	-162	-158	39	45	34	29	23	21	16	12	-101
15. Expensing of "Brownfields" environmental remediation costs (sunset 12/31/11).....	epoa 12/31/09	---	---	-493	-536	-66	83	91	86	77	67	57	50	-583
16. Deduction allowable with respect to income attributable to domestic production activities in Puerto Rico (sunset 12/31/11).....	tyba 12/31/09	---	---	-229	-186	---	---	---	---	---	---	---	---	-415
17. Modify tax treatment of certain payments under existing arrangements to controlling exempt organizations (sunset 12/31/11).....	proaa 12/31/09	---	---	-34	-5	---	---	---	---	---	---	---	---	-40

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
18. Treatment of certain dividends of regulated investment companies ("RICs") (sunset 12/31/11).....	[57]	---	---	-108	-66	---	---	---	---	---	---	---	---	-174
19. Extend the treatment of RICs as "qualified investment entities" under section 897 (FIRPTA) (sunset 12/31/11).....	1/1/10	---	---	-23	-36	---	---	---	---	---	---	---	---	-59
20. Exception under subpart F for active financing income (sunset 12/31/11).....	tyba 12/31/09	---	---	-5,200	-3,957	---	---	---	---	---	---	---	---	-9,157
21. Look-through treatment of payments between related CFCs under foreign personal holding company income rules (sunset 12/31/11).....	tyba 2009	---	---	-814	-691	---	---	---	---	---	---	---	---	-1,505
22. Basis adjustment to stock of S corporations making charitable contributions of property (sunset 12/31/11).....	cmi tyba 12/31/09	---	---	-19	-36	-6	-3	-3	-3	-3	-3	-3	-3	-82
23. Empowerment zone tax incentives (sunset 12/31/11).....	pa 12/31/09	---	---	-330	-46	3	1	---	-4	-1	-4	-4	-4	-387
24. Tax incentives for investment in the District of Columbia (sunset 12/31/11).....	pa 12/31/09	---	---	-88	-21	-2	-1	-4	-7	-4	-4	-4	-4	-138
25. Temporary increase in limit on cover over of rum excise tax revenues (from \$10.50 to \$13.25 per proof gallon) to Puerto Rico and the Virgin Islands (sunset 12/31/11) [58].....	abiUSa 12/31/09	---	---	-235	-27	---	---	---	---	---	---	---	---	-262
26. Economic development credit for American Samoa (sunset 12/31/11).....	tyba 12/31/09	---	---	-15	-12	---	---	---	---	---	---	---	---	-27
27. Work opportunity tax credit (sunset 12/31/11).....	wpoifibwa 8/31/11	---	---	[11]	-131	-16	-8	-5	-2	---	---	---	---	-162
28. Qualified zone academy bonds (\$400 million allocation) (sunset 12/31/11).....	oia 12/31/10	---	---	[11]	-3	-8	-16	-21	-22	-22	-21	-19	-19	-151
29. Premiums for mortgage insurance deductible as interest that is qualified residence interest (sunset 12/31/11).....	apoa 12/31/10	---	---	-261	-87	---	---	---	---	---	---	---	---	-348
30. Special rules applicable to qualified small business stock (sunset 12/31/11).....	saa 12/31/10	---	---	15	6	---	---	-62	-768	-420	-97	-74	-47	-1,445
D. Temporary Disaster Relief Provisions														
1. New York Liberty Zone - tax-exempt bond financing (sunset 12/31/11).....	bia 12/31/09	---	---	-8	-12	-12	-12	-12	-12	-12	-12	-12	-12	-116
2. GO Zone:														
a. Increase in rehabilitation credit (sunset 12/31/11).....	apoa 12/31/09	---	---	-39	-21	[11]	1	1	1	2	2	2	1	-50
b. Extend the placed-in-service deadline for GO Zone low-income housing credits (sunset 12/31/11).....	ppisa 12/31/10	---	---	-8	-34	-34	-34	-34	-34	-34	-34	-34	-34	-314
c. Tax-exempt bond financing (sunset 12/31/11).....	DOE	---	---	-5	-18	-26	-26	-26	-26	-25	-25	-25	-25	-226
d. Bonus depreciation for specified GO Zone extension property (sunset 12/31/11).....	ppisa 12/31/09	---	---	-171	-61	-4	-1	2	4	6	7	7	7	-202
<b>TOTAL OF PART SIXTEEN.....</b>		---	---	<b>-374,154</b>	<b>-422,910</b>	<b>-119,751</b>	<b>6,551</b>	<b>17,410</b>	<b>13,461</b>	<b>10,070</b>	<b>6,282</b>	<b>3,371</b>	<b>1,859</b>	<b>-857,806</b>

**PART SEVENTEEN: THE REGULATED INVESTMENT COMPANY MODERNIZATION ACT OF 2010 (P.L. 111-325, signed into law by the President on December 22, 2010)**

**I. Capital Loss Carryovers of Regulated Investment**

Companies ("RICs").....	[59]	---	---	3	22	34	39	43	48	53	59	65	-262	104
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Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
II. Modification of Gross Income and Asset Tests of RICs - savings provisions for failures of regulated investment companies to satisfy gross income and asset tests.....	[60]	---	---	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]
III. Modification of Rules Related to Dividends and Other Distributions														
A. Modification of Dividend Designation Requirements and Allocation Rules for RICs.....	di tyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
B. Earnings and Profits of RICs.....	tyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
C. Pass-Thru of Exempt-Interest Dividends and Foreign Tax Credits in Fund of Funds Structure.....	tyba DOE	---	---	-2	-4	-4	-4	-4	-4	-4	-5	-5	-5	-41
D. Modification of Rules for Spillover Dividends of RICs.....	di tyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
E. Return of Capital Distributions of RICs.....	di tyba DOE	---	---	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]
F. Distributions in Redemption of Stock of a RIC.....	da DOE	---	---	-5	-9	-9	-10	-10	-10	-11	-11	-12	-12	-99
G. Repeal Preferential Dividend Rule for Publicly Offered RICs.....	di tyba DOE	---	---	Negligible Revenue Effect										
H. Elective Deferral of Certain Late-Year Losses of RICs.....	tyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
I. Exception to Holding Period Requirement for Certain Regularly Declared Exempt-Interest Dividends.....	[61]	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
IV. Modifications Related to Excise Tax Applicable to RICs														
A. Excise Tax Exemption for Certain RICs Owned by Tax Exempt Entities.....	cyba DOE	---	---	Negligible Revenue Effect										
B. Deferral of Certain Gains and Losses of RICs for Excise Tax Purposes.....	cyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
C. Distributed Amount for Excise Tax Purposes Determined on Basis of Taxes Paid by RICs.....	cyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
D. Increase from 98% to 98.2% the Required Distribution Rate on Capital Gain Income by RICs...	cyba DOE	---	---	29	23	10	4	4	4	4	4	4	5	92
V. Other Provisions														
A. Repeal of Assessable Penalty with Respect to Liability for Tax of RICs.....	tyba DOE	---	---	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]	[11]
B. Modification of Sale Load Basis Deferral Rule for RICs.....	cii tyba DOE	---	---	-6	-8	-5	-2	-1	-1	-1	-1	-1	-1	-26
<b>TOTAL OF PART SEVENTEEN.....</b>		---	---	<b>19</b>	<b>24</b>	<b>26</b>	<b>27</b>	<b>32</b>	<b>37</b>	<b>41</b>	<b>46</b>	<b>51</b>	<b>-275</b>	<b>30</b>
<b>PART EIGHTEEN: THE OMNIBUS TRADE ACT OF 2010 (P.L. 111-344, signed into law by the President on December 29, 2010)</b>														
A. Extension of Health Coverage Tax Credit Improvements (sunset 2/13/11) [25].....	[62]	---	---	-19	-11	---	---	---	---	---	---	---	---	-31
B. Increase by 4.5 Percentage Points the Required Corporate Estimated Tax Payments Factor for Corporations With Assets of at Least \$1 Billion for Payments Due in July, August, and September 2015 [63].....	DOE	---	---	---	---	---	---	2,475	-2,475	---	---	---	---	---
<b>TOTAL OF PART EIGHTEEN.....</b>		---	---	<b>-19</b>	<b>-11</b>	---	---	<b>2,475</b>	<b>-2,475</b>	---	---	---	---	<b>-31</b>

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
<b>PART NINETEEN: THE JAMES ZADROGA 9/11 HEALTH AND COMPENSATION ACT OF 2010 - EXCISE TAX ON FOREIGN PROCUREMENT (P.L. 111-347, signed into law by the President on January 2, 2011).....</b>														
	pruceio/a DOE	---	---	305	495	490	485	480	475	471	466	461	457	4,585
<b>PART TWENTY: AUTHORITY OF TAX COURT TO APPOINT EMPLOYEES (P.L. 111-366, signed into law by the President on January 4, 2011).....</b>														
	[64]	---	----- <i>No Revenue Effect</i> -----											
<b>PART TWENTY-ONE: CUSTOMS USER FEES, CORPORATE ESTIMATED TAXES, AND EXTENSION OF ASSISTANCE FOR COBRA CONTINUATION COVERAGE [65]</b>														
A. Extension of Customs User Fees [66].....	various	----- <i>Estimated by the Congressional Budget Office</i> -----												
B. Modifications to Corporate Estimated Tax Payments														
1. Repeal 2010, 2011, and 2013 corporate estimated tax adjustments and add new 0.25 percentage point adjustment for payments due in July, August, and September 2014; applies to corporations with assets of at least \$1 billion (P.L. 111-42, signed into law by the President on July 28, 2009).....	DOE	---	6,864	3,024	-9,888	-11,850	11,994	-144	---	---	---	---	---	---
2. Increase by 1.50 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2014 (P.L. 111-124, signed into law by the President on December 28, 2009).....	DOE	---	---	---	---	---	806	-806	---	---	---	---	---	---
3. Increase the required corporate estimated tax payments otherwise due in July, August, or September 2014 by 0.75 percentage points and July, August, or September 2015 by 0.75 percentage points (P.L. 111-171, signed into law by the President on May 24, 2010).....	DOE	---	---	---	---	---	356	107	-463	---	---	---	---	---
4. Increase by 0.75 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2015 (P.L. 111-171, signed into law by the President on May 24, 2010).....	DOE	---	---	---	---	---	---	463	-463	---	---	---	---	---
5. Increase by 0.25 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2015 (P.L. 111-210, signed into law by the President on August 11, 2010).....	DOE	---	---	---	---	---	---	153	-153	---	---	---	---	---

Provision	Effective	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
6. Increase by 0.50 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2015 (P.L. 111-227, signed into law by the President on August 11, 2010).....	DOE	---	---	---	---	---	---	305	-305	---	---	---	---	---
7. Increase by 4.5 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2015 (P.L. 111-344, signed into law by the President on December 29, 2010).....	DOE	---	---	---	---	---	---	2,475	-2,475	---	---	---	---	---
C. Extension of Assistance for COBRA Continuation Coverage														
1. COBRA credit in Department of Defense Appropriations Act, 2010 (P.L. 111-118, signed into law by the President on December 19, 2009) [25].....	[67]	---	-4,473	-1,673	-330	-15	---	---	---	---	---	---	---	-6,490
2. COBRA credit in the Temporary Extension Act of 2010 (P.L. 111-144, signed into law by the President on March 2, 2010) [25].....	[68]	---	-735	-339	-11	---	---	---	---	---	---	---	---	-1,085
3. COBRA credit in the Continuing Extension Act of 2010 (P.L. 111-157, signed into law by the President on April 15, 2010) [25].....	[67]	---	-1,391	-642	-21	---	---	---	---	---	---	---	---	-2,054
<b>TOTAL OF PART TWENTY-ONE .....</b>		---	<b>265</b>	<b>370</b>	<b>-10,250</b>	<b>-11,865</b>	<b>13,156</b>	<b>2,553</b>	<b>-3,859</b>	---	---	---	---	<b>-9,629</b>

726

Joint Committee on Taxation

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

**Legend and Footnotes for the Appendix:**

Legend for "Effective" column:

aa = acquisitions after  
 abiUSA = articles brought into the United States after  
 aiiUSA = articles imported into the United States after  
 apa = appliances produced after  
 apoaa = amounts paid or accrued after  
 apoia = amounts paid or incurred after  
 apoii = amounts paid or incurred in  
 ara = articles removed after  
 Ara = amounts received after  
 bia = bonds issued after  
 caaa = covered asset acquisitions after  
 cba = courses beginning after  
 cii = charges incurred in  
 cma = contributions made after  
 cmd = contributions made during  
 cmi = contributions made in  
 cyba = calendar years beginning after  
 da = distributions after  
 Da = dispositions after  
 dda = decedents dying after  
 dda/gsta = decedents dying after and generation-  
 skipping transfers after  
 di = distributions in  
 dma = distributions made after

Dma = disclosures made after  
 dmi = distributions made in  
 DOE = date of enactment  
 eia = expenses incurred after  
 epoia = expenses paid or incurred after  
 epiod = expenses paid or incurred during  
 fitpoaa = foreign income taxes paid or accrued after  
 fsoua = fuel sold or used after  
 fsouo/a = fuels sold or used on or after  
 gma = gifts made after  
 gia = guarantees issued after  
 haa = homes acquired after  
 ipa = interest paid after  
 ita = instruments tendered after  
 iwbwa = individuals who begin work after  
 lia = levies issued after  
 ma = months after  
 mba = months beginning after  
 mbo/a = months beginning on or after  
 oca = ownership changes after  
 oia = obligations issued after  
 pa = periods after  
 paa = penalties assessed after  
 pba = periods beginning after

pma = payments made after  
 po/a = purchases on or after  
 ppisa = property placed in service after  
 proaa = payments received or accrued after  
 pruceio/a = payments received under contracts  
 entered into on or after  
 qfatpca = qualified film and television  
 productions commencing after  
 qhpa = qualified homes purchased after  
 ra = repurchases after  
 rfa = returns filed after  
 rpa = residences purchased after  
 rtbfo/a = returns to be filed on or after  
 sa = sales after  
 saa = stock acquired after  
 saua = sales and uses after  
 teia = transactions entered into after  
 tspo/a = tanning services performed on or after  
 tyba = taxable years beginning after  
 tybi = taxable years beginning in  
 tyea = taxable years ending after  
 wpa = wages paid after  
 wpoifibwa = wages paid or incurred for individuals  
 beginning work after

[1] Estimate includes the following off-budget effects:	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2009-20</u>
Requirements for Group Health Plans.....	---	-50	-100	-125	-125	-125	-125	-150	-150	-150	---	---	-1,100
Limitations on aggregate amount recovered on reconciliation of the health insurance tax credit and the advance of that credit.....	---	---	---	---	---	-14	-24	-40	-44	-49	-51	-52	-275
Parity for exclusion for employer-provided mass transit and parking benefits.....	---	---	-34	-11	---	---	---	---	---	---	---	---	-45
[2] Estimate does not include the following effects on Medicaid	<u>2009</u>	<u>2010</u>	<u>2011</u>	<u>2012</u>	<u>2013</u>	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2009-20</u>
outlays.....	---	30	60	70	70	80	90	90	100	110	---	---	700
[3] The excise tax rates on tobacco products and cigarette papers and tubes would be as follows:													
Cigars weighing not more than three pounds per thousand ("small cigars").....	\$50.33 per thousand (\$1.0066 per pack)												
Cigars weighing more than three pounds per thousand ("large cigars").....	52.75% of the manufacture's or importer's sales price but not more than \$0.4026 per cigar												
Cigarettes weighing not more than three pounds per thousand ("small cigarettes").....	\$50.33 per thousand (\$1.0066 per pack)												
Cigarettes weighing more than three pounds per thousand ("large cigarettes").....	\$105.69 per thousand												
Cigarette papers.....	\$0.0315 for each 50 papers												
Cigarette tubes.....	\$0.0630 for each 50 tubes												
Snuff.....	\$1.51 per pound												
Chewing tobacco.....	\$0.5033 per pound												
Pipe tobacco.....	\$2.8311 per pound												
Roll-your-own tobacco.....	\$24.78 per pound												
[4] Gain of less than \$500,000.													
[5] Estimate provided by the Congressional Budget Office.													
[6] The study will be completed no later than one year after the date of enactment.													
[7] Increase by 0.5 percentage points the required corporate estimated tax payments factor for corporations with assets of at least \$1 billion for payments due in July, August, and September 2013.													
[8] Estimated outlay effects as a result of U.S. possessions provision provided by the Joint Committee on Taxation in consultation with the Congressional Budget Office.													

**Footnotes for the Appendix continued:**

- [9] Estimate includes interaction with Making Work Pay Credit and Additional Tax Relief for Families With Children.  
 [10] This item does not have a separate description in the text of the document.  
 [11] Loss of less than \$500,000.  
 [12] Estimate includes outlay effects provided by the Congressional Budget Office.  
 [13] Effective for net operating losses generated in either a taxable year beginning in 2008 or a taxable year ending in 2008.  
 [14] Effective for any unemployed veteran hired in 2009 and 2010 within five years (but not less than two months) of the date of discharge.  
 [15] The temporary suspension of section 163(e)(5) applies to obligations issued after August 31, 2008, in taxable years ending after such date. The additional authority granted to the Secretary to use a rate higher than the applicable Federal rate for purposes of applying section 163(e)(5) applies to obligations issued after December 31, 2009, in taxable years ending after such date.  
 [16] Modifications to the definitions of qualified energy property are effective for property placed in service after the date of enactment.  
 [17] The neighborhood electric vehicle and motorcycle rule is effective for vehicles acquired after date of enactment. The elimination of neighborhood vehicles and heavy plug-ins from section 30D and the 200,000 vehicle/manufacturer cap is effective for vehicles acquired after December 31, 2009.  
 [18] Estimate includes indirect effects of COBRA subsidy on Unemployment Insurance program.  
 [19] We estimate that approximately 7 million people, including COBRA policyholders and their dependents, would benefit from this credit for some portion of 2009.  
 [20] Effective for premiums for months of coverage beginning after the date of enactment.  
 [21] Estimate includes indirect revenue effects of Trade Adjustment Assistance Reauthorization; estimate does not include outlay effects of TAA.  
 [22] In general, the modifications apply to residences purchased after November 30, 2009. The waiver of recapture for individuals on qualified official extended duty applies to dispositions and cessations after December 31, 2008. The mathematical error authority applies to returns for taxable years ending on or after April 9, 2008. Provisions relating to long-time residents of the same principal residence, and income, purchase price, age, related party, dependent, and documentation limitations apply for purchases after the date of enactment.  
 [23] Generally effective for net operating losses arising in taxable years ending after December 31, 2007.

[24] The proposal also appropriates a transfer from the General Fund to the Social Security Trust Fund to keep the trust fund whole. Thus, the reported estimate is all on-budget.

[25] Estimate includes the following outlay effects:	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2009-20
Qualified Tax Credit Bonds.....	---	98	694	1,091	1,314	1,441	1,441	1,441	1,441	1,441	1,441	1,441	13,284
Limitations on aggregate amount recovered on reconciliation of the health insurance tax credit and the advance of that credit.....	---	---	---	---	---	-610	-1,297	-2,167	-2,639	-2,893	-3,081	-3,283	-15,969
Authority to disclose return information concerning outstanding tax debts for purposes of enhancing Medicare Program Integrity [5].....	---	---	---	-38	-38	-50	-50	-50	-50	-50	-50	-50	-425
Collection of past-due, legally enforceable State debts [51].....	---	---	---	-1,308	-1,076	-455	-337	-291	-270	-276	-416	-433	-4,863
Retain 10% bracket.....	---	---	---	1,198	1,239	---	---	---	---	---	---	---	2,437
Retain the child tax credit at \$1,000; refundable; AMT rules.....	---	---	---	16,457	16,530	---	---	---	---	---	---	---	32,987
Marriage penalty - standard deduction and 15% rate.....	---	---	---	2,000	2,030	---	---	---	---	---	---	---	4,030
EIC modification and simplification (\$3,000).....	---	---	---	3,724	3,781	---	---	---	---	---	---	---	7,505
Dependent care tax credit.....	---	---	---	49	146	---	---	---	---	---	---	---	195
Adoption credit.....	---	---	---	---	53	---	---	---	---	---	---	---	53
American opportunity tax credit.....	---	---	---	2,086	2,172	---	---	---	---	---	---	---	4,258
Reduce the earnings threshold for the refundable portion of the child tax credit to \$3,000.....	---	---	---	9,826	9,917	---	---	---	---	---	---	---	19,743
Increase in earned income tax credit percentage.....	---	---	---	1,694	1,688	---	---	---	---	---	---	---	3,382
EIC modification and simplification (\$5,000).....	---	---	---	1,270	1,250	---	---	---	---	---	---	---	2,520
Temporary extension of unemployment insurance and related matters [5].....	---	---	34,515	21,565	---	---	---	---	---	---	---	---	56,080
Grants for specified energy property in lieu of tax credits.....	---	---	1,941	1,045	---	---	---	---	---	---	---	---	2,987
Refunds disregarded in the administration of Federal programs and Federally assisted programs [5].....	---	---	4	4	---	---	---	---	---	---	---	---	8
Extension of health coverage tax credit improvements.....	---	---	15	9	---	---	---	---	---	---	---	---	24
COBRA credit in DOD Act.....	---	---	---	313	157	27	8	---	---	---	---	---	504
COBRA credit in TEA.....	---	---	---	51	34	8	---	---	---	---	---	---	94
COBRA credit in CEA.....	---	---	---	97	64	16	---	---	---	---	---	---	177

728

- [26] Estimates for the rest of this title were provided by the Congressional Budget Office.  
 [27] Present law provides for a corporate estimated payments factor of 134.75 percent.

**Footnotes for the Appendix continued:**

- [28] Estimate included with estimate of associated effects of coverage provisions on revenues and other revenue provisions as reported by the Congressional Budget Office, Congressional Budget Office, cost estimate for the amendment in the nature of a substitute for H.R. 4782, the "Reconciliation Act of 2010," incorporating a proposed manager's amendment made public on March 20, 2010, available at <http://www.cbo.gov/ftpdocs/113xx/doc11379/AmendReconProp.pdf>.
- [29] The fee on health insurance and self-insurance plans is effective with respect to policies and plans for portions of policy or plan years beginning on or after October 1, 2012.
- [30] The description and revenue estimate of the provision reflects the modifications made by the "Health Care and Education Reconciliation Act of 2010."
- [31] Gain of less than \$50 million.
- [32] Estimate includes interaction with the high premium excise tax.
- [33] Effective for calendar years beginning after December 31, 2013; fee is allocated based on market share of net premiums written for any United States health risk for calendar years beginning after December 31, 2012.
- [34] Effective for remuneration paid in taxable years beginning after 2012 with respect to services performed after 2009.
- [35] Effective for health benefits and coverage provided after the date of enactment.
- [36] Loss of less than \$50 million.
- [37] Effective for expenditures paid or incurred after December 31, 2008, in taxable years beginning after December 31, 2008.
- [38] Effective as if included in section 1501(b) of the Patient Protection and Affordable Care Act.
- [39] Estimate does not include Congressional Budget Office outlay effects. These effects were provided by the Congressional Budget Office separately.
- [40] The provision amends Internal Revenue Code section 6103(k)(10), which sunsets December 31, 2011. Revenue effects after the sunset date are due to a decrease in the growth rate of prisoner fraud prior to the sunset. Although the present-law growth rate resumes after the sunset, the level of fraud remains lower due to preventive measures assumed to take place prior to the sunset.
- [41] Effective for acquisitions of U.S. property determined under section 956(c) after December 31, 2010.
- [42] Effective as if included in section 513 of the "Hiring Incentives to Restore Employment Act."
- [43] Estimate includes effects on outlays from the Pittman-Robertson Aid to Wildlife Trust Fund (provided by the Congressional Budget Office).
- [44] Effective for articles sold by the manufacturer, producer, or importer after the date of enactment.
- [45] Effective for restitution ordered after the date of enactment.
- [46] Effective for credits determined in the taxpayer's first taxable year beginning after December 31, 2009.
- [47] Estimate includes effects on the Social Security trust fund.
- [48] Negligible revenue effect.
- [49] First report shall be submitted not later than December 31, 2010.
- [50] Estimate is based on a 36 percentage point increase to the 2015 corporate estimated tax shift under paragraph (2) of section 561 of the "Hiring Incentives to Restore Employment Act," in effect on September 16, 2010.
- [51] Estimate provided by the Joint Committee on Taxation in collaboration with the Congressional Budget Office.
- [52] Effective with respect to refunds under section 6402 payable on or after the date of enactment.
- [53] Estimate includes the following effects:
- |                            | <u>2009</u> | <u>2010</u> | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2014</u> | <u>2015</u> | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> | <u>2020</u> | <u>2009-20</u> |
|----------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|----------------|
| Total Revenue Effects..... | ---         | ---         | -707        | -964        | -243        | ---         | ---         | ---         | ---         | ---         | ---         | ---         | -1,914         |
| On-budget effects.....     | ---         | ---         | -460        | -653        | -164        | ---         | ---         | ---         | ---         | ---         | ---         | ---         | -1,277         |
| Off-budget effects.....    | ---         | ---         | -246        | -311        | -79         | ---         | ---         | ---         | ---         | ---         | ---         | ---         | -636           |
- [54] Effective for property placed in service after December 31, 2010, in taxable years ending after such date.
- [55] Estimate includes the following effects:
- |                            | <u>2009</u> | <u>2010</u> | <u>2011</u> | <u>2012</u> | <u>2013</u> | <u>2014</u> | <u>2015</u> | <u>2016</u> | <u>2017</u> | <u>2018</u> | <u>2019</u> | <u>2020</u> | <u>2009-20</u> |
|----------------------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|----------------|
| Total Revenue Effects..... | ---         | ---         | -67,239     | -44,414     | ---         | ---         | ---         | ---         | ---         | ---         | ---         | ---         | -111,653       |
| On-budget effects.....     | ---         | ---         | 1,293       | 1,274       | ---         | ---         | ---         | ---         | ---         | ---         | ---         | ---         | 2,567          |
| Off-budget effects.....    | ---         | ---         | -68,532     | -45,688     | ---         | ---         | ---         | ---         | ---         | ---         | ---         | ---         | -114,220       |
- [56] Estimate includes interaction with the extension of the American opportunity tax credit.
- [57] Effective for dividends with respect to taxable years of regulated investment companies beginning after December 31, 2009.
- [58] Estimate provided by the Congressional Budget Office and is preliminary and subject to change.
- [59] The provision generally applies to net capital losses for taxable years beginning after the date of enactment. The provision relating to the treatment of present-law carryovers applies to taxable years beginning after the date of enactment.
- [60] The provision applies to taxable years with respect to which the due date (determined with regard to extensions) of the return of tax is after the date of enactment.
- [61] Effective for stock for which the taxpayer's holding period begins after the date of enactment.
- [62] Effective for months beginning (or, for certain provisions, plan years beginning or events occurring) after December 31, 2010.
- [63] Estimate is based on a 4.5 percentage point increase to the 2015 corporate estimated tax shift under paragraph (2) of section 561 of the "Hiring Incentives to Restore Employment Act," in effect on December 21, 2010.
- [64] Effective on the date the United States Tax Court adopts a personnel management system after the date of enactment.
- [65] Not elsewhere included.
- [66] For the details relating to Custom User Fees, see Part Twenty-One of the General Explanation. For the estimates relating to the Custom User Fees, see the Congressional Budget Office website, [www.CBO.gov](http://www.CBO.gov).
- [67] Effective as if included in the American Recovery and Reinvestment Act of 2009.
- [68] Generally effective as if included in the American Recovery and Reinvestment Act of 2009.