

**ESTIMATED REVENUE EFFECTS OF H.R. 3301,  
THE "TAXPAYER CERTAINTY AND DISASTER TAX RELIEF ACT OF 2019,"  
SCHEDULED FOR MARKUP BY THE COMMITTEE ON WAYS AND MEANS ON JUNE 20, 2019**

Fiscal Years 2019 - 2029

*[Millions of Dollars]*

Provision	Effective	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2019-24	2019-29
<b>I. Extension of Certain Expiring Provisions</b>														
A. Tax Relief and Support for Families and Individuals														
1. Exclusion from gross income of discharge of indebtedness on qualified principal residence indebtedness (sunset 12/31/20).....	doia 12/31/17	-853	-764	-666	---	---	---	---	---	---	---	---	-2,283	-2,283
2. Extension of mortgage insurance premiums treated as qualified residence interest (sunset 12/31/20).....	apoa 12/31/17	-261	-566	-426	---	---	---	---	---	---	---	---	-1,253	-1,253
3. Medical expense deduction for expenses in excess of 7.5 percent of adjusted gross income (sunset 12/31/20).....	tyea 12/31/18	-170	-2,010	-1,433	---	---	---	---	---	---	---	---	-3,613	-3,613
4. Extension of above-the-line deduction for qualified tuition and related expenses (sunset 12/31/20).....	tyba 12/31/17	-58	-431	-175	---	---	---	---	---	---	---	---	-664	-664
5. Black Lung Disability Trust Fund - increase in amount of excise tax on coal (sunset 12/31/20).....	[1]	56	161	41	---	---	---	---	---	---	---	---	257	257
B. Incentives for Employment, Economic Growth, and Community Development														
1. Extension of Indian employment tax credit (sunset 12/31/20).....	tyba 12/31/17	-78	-77	-69	[2]	[2]	[2]	[2]	[2]	[2]	[2]	[2]	-223	-223
2. Extension of railroad track maintenance credit (sunset 12/31/20).....	epoid tyba 12/31/17	-334	-216	-97	---	---	---	---	---	---	---	---	-647	-647
3. Extension of mine rescue team training credit (sunset 12/31/20).....	tyba 12/31/17	-2	-1	-1	-1	[2]	[2]	[2]	[2]	[2]	[2]	---	-6	-7
4. Extension of 7-year recovery period for motorsports entertainment complexes (sunset 12/31/20).....	ppisa 12/31/17	-32	-39	-41	-30	-21	-17	-13	-7	1	5	7	-180	-187
5. Extension of accelerated depreciation for business property on Indian reservations (sunset 12/31/20).....	ppisa 12/31/17	-16	-47	-27	-12	-3	-2	-4	-9	-12	-14	-14	-106	-159
6. Extension of special expensing rules for certain film, television, and live theatrical productions (sunset 12/31/20).....	pca 12/31/17	-1,471	-289	601	899	260	---	---	---	---	---	---	---	---
7. Extension of empowerment zone tax incentives (sunset 12/31/20).....	tyba 12/31/17	-320	-326	-185	2	1	1	[2]	[2]	[2]	[2]	[2]	-826	-826
8. Extension of American Samoa economic development credit (sunset 12/31/20).....	tyba 12/31/17	-12	-8	-4	---	---	---	---	---	---	---	---	-25	-25

Provision	Effective	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2019-24	2019-29
C. Incentives for Energy Production, Efficiency, and Green Economy Jobs														
1. Biodiesel and renewable diesel incentives - extend present-law income tax credits, excise tax credit, and outlay payments (sunset 12/31/20).....	fsoua 12/31/17	-5,068	-3,042	-830	---	---	---	---	---	---	---	---	-8,940	-8,940
2. Extension of second generation biofuel producer credit (sunset 12/31/20).....	qsgbpa 12/31/17	-21	-15	-7	---	---	---	---	---	---	---	---	-43	-43
3. Extension of credit for section 25C nonbusiness energy property (sunset 12/31/20).....	ppisa 12/31/17	-208	-624	-393	---	---	---	---	---	---	---	---	-1,225	-1,225
4. Extension of alternative motor vehicle credit for qualified fuel cell motor vehicles (sunset 12/31/20).....	ppa 12/31/17	-7	-5	-2	---	---	---	---	---	---	---	---	-14	-14
5. Extension of credit for alternative fuel vehicle refueling property (sunset 12/31/20).....	ppisa 12/31/17	-88	-111	-97	-9	-8	-8	-7	-4	-1	1	1	-323	-332
6. Extension of credit for two-wheeled plug-in electric vehicles (sunset 12/31/20).....	vaa 12/31/17	-1	-1	-1	[2]	[2]	[2]	[2]	---	---	---	---	-3	-3
7. Extension of beginning-of-construction date for renewable power facilities eligible to claim the electricity production credit or investment credit in lieu of the production credit (sunset 12/31/20).....	tyba 12/31/17 & tyba 12/31/19	---	-102	-185	-214	-162	-169	-208	-239	-258	-261	-262	-831	-2,060
8. Extension of production credit for Indian coal facilities (sunset 12/31/20).....	cpa 12/31/17	-33	-26	-16	-9	-8	-8	-7	-4	-2	[2]	---	-100	-113
9. Extension of credit for construction of energy-efficient new homes (sunset 12/31/20).....	haa 12/31/17	-230	-184	-119	-64	-56	-56	-45	-26	-7	---	---	-710	-788
10. Extension of special depreciation allowance for second generation biofuel plant property (sunset 12/31/20).....	ppisa 12/31/17	----- <i>Negligible Revenue Effect</i> -----												
11. Extension of energy efficient commercial buildings deduction (sunset 12/31/20).....	ppisa 12/31/17	-140	-83	-25	5	4	4	3	3	2	2	2	-234	-224
12. Extension of special rule for sales or dispositions to implement Federal Energy Regulatory Commission ("FERC") or State electric restructuring policy for qualified electric utilities (sunset 12/31/20).....	da 12/31/17	-276	-147	2	78	78	78	78	62	37	10	---	-186	---
13. Extension and clarification of excise tax credits relating to alternative fuels (sunset 12/31/20).....	fsoua 12/31/17	-1,241	-747	-202	---	---	---	---	---	---	---	---	-2,191	-2,191
14. Extension of Oil Spill Liability Trust Fund financing rate (sunset 12/31/20).....	fdofcmba DOE	----- <i>No Revenue Effect</i> -----												
D. Certain Provisions Expiring at the End of 2019														
1. New markets tax credit (sunset 12/31/20) [3].....	cyba 12/31/19	---	[2]	-8	-37	-113	-173	-200	-226	-247	-248	-215	-332	-1,468
2. Employer credit for paid family and medical leave (sunset 12/31/20) [4].....	wpi tyba 12/31/19	---	-767	-803	-334	-167	-119	-48	---	---	---	---	-2,190	-2,237
3. Work opportunity tax credit (sunset 12/31/20).....	iwbwfta 12/31/19	---	-571	-826	-289	-113	-86	-78	-32	-28	-16	-2	-1,885	-2,042
4. Excise taxes on beer, wine, and distilled spirits (sunset 12/31/20):														
a. Special rule for the production period for beer, wine, and distilled spirits.....	icpoaa 12/31/19	---	-27	5	5	5	4	-1	[2]	[2]	[2]	[2]	-8	-10
b. Modifying the rates of taxation of beer and certain other rules.....	bra 12/31/19	---	-86	-39	---	---	---	---	---	---	---	---	-126	-126

Provision	Effective	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029	2019-24	2019-29
c. Modifying the rates of taxation of wine and certain other rules.....	wra 12/31/19	---	-114	-72	---	---	---	---	---	---	---	---	-186	-186
d. Modifying the rates of taxation of distilled spirits and certain other rules.....	dsra 12/31/19	---	-427	-415	---	---	---	---	---	---	---	---	-842	-842
e. Simplification of rules regarding records, statements, and returns.....	cqba 12/31/19	----- <i>Negligible Revenue Effect</i> -----												
5. Look-through treatment of payments between related CFCs under foreign personal holding company income rules (sunset 12/31/20).....	[5]	---	-471	-202	---	---	---	---	---	---	---	---	-673	-673
6. Credit for health insurance costs of eligible individuals (health coverage tax credit) (sunset 12/31/20) [6].....	mba 12/31/19	---	-28	-15	---	---	---	---	---	---	---	---	-43	-43
<b>Total of Extension of Certain Expiring Provisions .....</b>		<b>-10,864</b>	<b>-12,191</b>	<b>-6,732</b>	<b>-10</b>	<b>-303</b>	<b>-551</b>	<b>-530</b>	<b>-482</b>	<b>-515</b>	<b>-521</b>	<b>-483</b>	<b>-30,654</b>	<b>-33,190</b>
<b>II. Estate and Gift Tax - Reduction of Unified Credit Against Estate Tax.....</b>														
dda & gma 12/31/22		---	---	19	144	1,121	10,264	11,481	11,990	1,733	667	142	11,548	37,561
<b>III. Disaster Tax Relief</b>														
1. Special disaster-related rules for use of retirement funds.....	DOE	-19	-198	-159	-68	-58	-24	[2]	[2]	[2]	[2]	[2]	-525	-525
2. Employee retention credit for employers affected by qualified disasters.....	[7]	-167	-28	-14	-8	-4	[2]	[2]	[2]	[2]	[2]	[2]	-221	-221
3. Other disaster-related tax relief provisions:														
a. Temporary increase in limitation on qualified contributions.....	DOE	-2,752	-131	1,202	471	294	187	---	---	---	---	---	-728	-728
b. Special rules for qualified disaster-related personal casualty losses.....	DOE	-2,677	-2,646	-957	-408	-70	---	---	---	---	---	---	-6,758	-6,758
c. Special rule for determining earned income [6].....	DOE	-122	-30	---	---	---	---	---	---	---	---	---	-152	-152
4. Automatic extension of filing deadlines in case of certain taxpayers affected by Federally declared disasters.....	Fddda DOE	----- <i>Negligible Revenue Effect</i> -----												
5. Modification of the tax rate for the excise tax on investment income of private foundations.....	tyba DOE	[2]	[2]	[2]	-1	-1	-1	-1	-1	-1	-1	-1	-2	-6
6. Additional low-income housing credit allocations for qualified 2017 and 2018 California disaster areas.....	DOE	-2	-25	-65	-92	-99	-99	-99	-99	-99	-99	-97	-382	-875
7. Treatment of certain possessions.....	DOE	----- <i>Estimate Included in Items III.1.- III.6.</i> -----												
<b>Total of Disaster Tax Relief .....</b>		<b>-5,739</b>	<b>-3,058</b>	<b>7</b>	<b>-106</b>	<b>62</b>	<b>63</b>	<b>-100</b>	<b>-100</b>	<b>-100</b>	<b>-100</b>	<b>-98</b>	<b>-8,768</b>	<b>-9,265</b>
<b>NET TOTAL .....</b>		<b>-16,603</b>	<b>-15,249</b>	<b>-6,706</b>	<b>28</b>	<b>880</b>	<b>9,776</b>	<b>10,851</b>	<b>11,408</b>	<b>1,118</b>	<b>46</b>	<b>-439</b>	<b>-27,874</b>	<b>-4,894</b>

Joint Committee on Taxation

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

[Legend and Footnotes for JCX-31-19 appear on the following page]

**Legend and Footnotes for JCX-31-19:**

Legend for "Effective" column:

apoa = amounts paid or incurred after  
 bra = beer removed after  
 cba = construction beginning after  
 cpa = coal produced after  
 cqba = calendar quarters beginning after  
 cyba = calendar years beginning after  
 da = dispositions after  
 dda = decedents dying after  
 DOE = date of enactment  
 doia = discharge of indebtedness after  
 dsra = distilled spirits removed after

epoid = expenditures paid or incurred during  
 gma = gifts made after  
 fdofcmba = first day of first calendar month beginning after  
 Fddda = Federally declared disasters declared after  
 fsoua = fuel sold or used after  
 haa = homes acquired after  
 icpoaa = interest costs paid or accrued after  
 iwbfwtea = individuals who begin work for the employer after  
 mba = months beginning after

pca = productions commencing after  
 ppa = property purchased after  
 ppisa = property placed in service after  
 qsgbpa = qualified second generation biofuel production after  
 tyba = taxable years beginning after  
 vaa = vehicles acquired after  
 wpi = wages paid in  
 wra = wine removed after

[1] Effective on and after the first day of the first calendar month beginning after the date of the enactment of this Act.

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

[3] Allocation in calendar year 2020 increased to \$5 billion.

[4] Estimate includes the following budget effects:

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2019-24</u>	<u>2019-29</u>
Total Revenue Effect.....	---	-767	-803	-334	-167	-119	-48	---	---	---	---	-2,190	-2,237
On-budget effects.....	---	-774	-806	-334	-167	-119	-48	---	---	---	---	-2,199	-2,246
Off-budget effects.....	---	7	3	---	---	---	---	---	---	---	---	9	9

[5] Effective for taxable years of foreign corporations beginning after December 31, 2019, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.

[6] Estimates contain the following outlay effect:

	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2019-24</u>	<u>2019-29</u>
Credit for health insurance costs of eligible individuals (health coverage tax credit).....	---	26	9	---	---	---	---	---	---	---	---	35	35
Special rule for determining earned income.....	88	22	---	---	---	---	---	---	---	---	---	110	110

[7] For employers affected by qualified disasters, effective for wages paid or incurred from the incident beginning date of such qualified disaster and 150 days after the last day of the last day of the incident period of such qualified disaster.