

**ESTIMATED BUDGET EFFECTS OF AN AMENDMENT IN THE NATURE OF A SUBSTITUTE TO H.R. 3474,
THE "EXPIRING PROVISIONS IMPROVEMENT, REFORM, AND EFFICIENCY ('EXPIRE') ACT OF 2014,"
SCHEDULED FOR CONSIDERATION BY THE SENATE**

Fiscal Years 2014 - 2024

[Millions of Dollars]

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
Title I. Extensions and Modifications of Expired and Expiring Tax Provisions														
Subtitle A. Provisions Expiring in 2013														
Part I - Individual Tax Extenders														
1. Health coverage tax credit (sunset 12/31/15) [1].....	cmba 12/31/13	-22	-82	-31	---	---	---	---	---	---	---	---	-134	-134
2. Above-the-line deduction of up to \$250 for teacher classroom expenses (sunset 12/31/15).....	tyba 12/31/13	-11	-246	-173	---	---	---	---	---	---	---	---	-430	-430
3. Discharge of indebtedness on principal residence excluded from gross income of individuals (sunset 12/31/15).....	doia 12/31/13	-471	-3,012	-1,929	---	---	---	---	---	---	---	---	-5,413	-5,413
4. Parity for exclusion from income for employer-provided mass transit and parking benefits (sunset 12/31/15) [2].....	ma 12/31/13 & tyba 12/31/13	-44	-105	-30	---	---	---	---	---	---	---	---	-180	-180
5. Mortgage insurance premiums treated as qualified residence interest (sunset 12/31/15).....	apoa 12/31/13	-138	-922	-794	---	---	---	---	---	---	---	---	-1,854	-1,854
6. Deduction for State and local general sales taxes (sunset 12/31/15).....	tyba 12/31/13	[3]	-3,382	-2,872	-240	---	---	---	---	---	---	---	-6,494	-6,494
7. Contributions of capital gain real property made for conservation purposes (sunset 12/31/15).....	cmi tyba 12/31/13	-23	-64	-53	-12	-2	-7	-21	-27	-23	-20	-18	-160	-268
8. Above-the-line deduction for qualified tuition and related expenses (sunset 12/31/15).....	tyba 12/31/13	-15	-344	-237	---	---	---	---	---	---	---	---	-596	-596
9. 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 (sunset 12/31/15).....	dmi tyba 12/31/13	-248	-633	-411	-50	-55	-57	-60	-63	-66	-68	-70	-1,453	-1,779
Part II - Business Tax Extenders														
1. Modification of the research credit (sunset 12/31/15).....	apoa 12/31/13 & cdf tyba 12/31/13	-2,376	-4,238	-2,459	-1,220	-1,071	-941	-821	-755	-720	-697	-661	-12,305	-15,959
2. Modification of temporary minimum LIHTC rate for non-Federally subsidized new buildings (9%) and existing buildings (4%) (sunset 12/31/15).....	1/1/14	---	-1	-2	-4	-5	-6	-6	-6	-6	-6	-6	-19	-49
3. Military housing allowance exclusion for determining area median gross income (sunset 12/31/15).....	ido/a 1/1/14	-1	-4	-5	-5	-5	-5	-5	-5	-5	-5	-4	-25	-49
4. Indian employment tax credit (sunset 12/31/15).....	tyba 12/31/13	-21	-51	-39	-11	-1	---	---	---	---	---	---	-124	-124
5. Modification of the new markets tax credit (sunset 12/31/15)..	cyba 12/31/13	-2	-5	-27	-90	-171	-221	-252	-279	-289	-268	-235	-514	-1,838
6. Railroad track maintenance credit (sunset 12/31/15).....	epoii tyba 12/31/13	-72	-207	-135	[3]	---	---	---	---	---	---	---	-414	-414
7. Mine rescue team training credit (sunset 12/31/15).....	tyba 12/31/13	-1	-2	-1	-1	[3]	[3]	[3]	---	---	---	---	-3	-5

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
8. Employer wage credit for activated military reservists (sunset 12/31/15).....	pma 12/31/13	-5	-58	-121	-79	-12	---	---	---	---	---	---	-274	-274
9. Modification of work opportunity tax credit (sunset 12/31/15).....	iwbwfta 12/31/13	-449	-1,126	-938	-368	-164	-81	-31	-4	---	---	---	-3,127	-3,162
10. Modification of qualified zone academy bonds (sunset 12/31/15).....	oia 12/31/13 & [4]	[3]	-3	-11	-24	-34	-39	-38	-36	-34	-33	-32	-111	-284
11. Classification of certain race horses as 3-year property (sunset 12/31/15).....	ppisa 12/31/13	-24	-73	-71	-13	26	39	43	38	22	6	---	-117	-9
12. 15-year straight-line cost recovery for qualified leasehold improvements, qualified restaurant buildings and improvements, and qualified retail improvements (sunset 12/31/15) [5].....	ppisa 12/31/13	-67	-273	-483	-551	-542	-522	-498	-494	-492	-476	-426	-2,438	-4,825
13. 7-year recovery period for motorsports entertainment complexes (sunset 12/31/15) [6].....	ppisa 12/31/13	-3	-12	-18	-15	-10	-7	-6	-5	-1	2	3	-64	-71
14. Accelerated depreciation for business property on an Indian reservation (sunset 12/31/15).....	ppisa 12/31/13	-56	-155	-138	-32	31	65	73	49	17	-4	-8	-285	-158
15. Bonus depreciation:														
a. Additional first-year depreciation for 50% of basis of qualified property (sunset 12/31/15) [7].....	ppisa 12/31/13 ityeasd	-8,126	-73,611	1,958	28,047	18,113	13,159	8,823	4,851	2,353	1,012	568	-20,459	-2,852
b. Election to accelerate AMT credit in lieu of bonus depreciation (sunset 12/31/15).....	ppisa 12/31/13 ityeasd	-121	-265	-171	-34	-2	-3	-3	-2	-1	[3]	[3]	-596	-602
16. Enhanced charitable deduction for contributions of food inventory (sunset 12/31/15).....	cma 12/31/13	-57	-145	-89	---	---	---	---	---	---	---	---	-292	-292
17. Modification of increased expensing limitations and treatment of certain real property as section 179 property (sunset 12/31/15).....	tyba 12/31/13	-7,249	-12,779	-1,355	6,659	4,230	3,070	2,089	1,148	568	270	162	-7,424	-3,186
18. Election to expense mine safety equipment (sunset 12/31/15).....	ppisa 12/31/13	-12	-16	1	8	5	4	4	3	2	[8]	---	-9	---
19. Special expensing rules for certain film and television productions; special expensing for live theatrical productions (sunset 12/31/15).....	generally pca 12/31/13	-37	-387	-64	136	104	59	44	36	30	26	26	-189	-27
20. Deduction allowable with respect to income attributable to domestic production activities in Puerto Rico (sunset 12/31/15).....	tyba 12/31/13	-36	-110	-76	---	---	---	---	---	---	---	---	-222	-222
21. Modification of tax treatment of certain payments under existing arrangements to controlling exempt organizations (sunset 12/31/15).....	proaa 12/31/13	-14	-18	-4	---	---	---	---	---	---	---	---	-36	-36
22. Treatment of certain dividends of RICs (sunset 12/31/15).....	[9]	-68	-100	-30	---	---	---	---	---	---	---	---	-198	-198
23. Treatment of RICs as "qualified investment entities" under section 897 (FIRPTA) (sunset 12/31/15).....	1/1/14	-31	-47	-15	---	---	---	---	---	---	---	---	-93	-93
24. Exception under subpart F for active financing income (sunset 12/31/15).....	[10]	-2,033	-5,166	-3,175	---	---	---	---	---	---	---	---	-10,373	-10,373
25. Look-through treatment of payments between related CFCs under foreign personal holding company income rules (sunset 12/31/15).....	[10]	-808	-1,254	-389	---	---	---	---	---	---	---	---	-2,450	-2,450

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
26. Exclusion of 100 percent of gain on certain small business stock (sunset 12/31/15).....	saa 12/31/13	2	15	18	---	---	-134	-924	-925	---	---	---	-99	-1,948
27. Basis adjustment to stock of S corporations making charitable contributions of property (sunset 12/31/15).....	cmi tyba 12/31/13	-16	-58	-28	-2	[3]	[3]	[3]	[3]	[3]	[3]	[3]	-104	-104
28. Reduction in S corporation recognition period for built-in gains tax (sunset 12/31/15).....	tyba 12/31/13	-15	-138	-59	-6	-5	-3	-2	-1	-1	-1	-1	-226	-232
29. Empowerment zone tax incentives (sunset 12/31/15).....	pa 12/31/13	-81	-205	-153	-27	-12	-4	-2	-3	-4	-4	-3	-483	-498
30. 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 12/31/15) [1] [11].....	abiUSa 12/31/13	-142	-168	-26	---	---	---	---	---	---	---	---	-336	-336
31. American Samoa economic development credit (sunset 12/31/15).....	tyba 12/31/13	-10	-15	-5	---	---	---	---	---	---	---	---	-29	-29
Part III - Energy Tax Extenders														
1. Modification of credit for section 25C nonbusiness energy property (sunset 12/31/15).....	ppisa 12/31/13	-198	-807	-643	---	---	---	---	---	---	---	---	-1,648	-1,648
2. Credit for two-wheeled plug-in electric vehicles (sunset 12/31/15).....	vaa 12/31/13	[3]	-2	-1	---	---	---	---	---	---	---	---	-2	-2
3. Second generation biofuel producer credit (sunset 12/31/15).....	fpa 12/31/13	-15	-28	-12	---	---	---	---	---	---	---	---	-55	-55
4. Incentives for biodiesel and renewable diesel:														
a. Income tax credits for biodiesel fuel, biodiesel used to produce a qualified mixture, and small agri-biodiesel producers (sunset 12/31/15).....	saua 12/31/13	-945	-1,276	-344	---	---	---	---	---	---	---	---	-2,565	-2,565
b. Income tax credits for renewable diesel fuel and renewable diesel used to produce a qualified mixture (sunset 12/31/15).....	saua 12/31/13	----- Estimate Included In Item I.C.4.a. -----												
c. Excise tax credits and outlay payments for biodiesel fuel mixtures (sunset 12/31/15).....	saua 12/31/13	----- Estimate Included In Item I.C.4.a. -----												
d. Excise tax credits and outlay payments for renewable diesel fuel mixtures (sunset 12/31/15).....	saua 12/31/13	----- Estimate Included In Item I.C.4.a. -----												
5. Modification of credit for the production of Indian coal (sunset 12/31/15).....	cpa 12/31/13	-18	-31	-15	-4	-3	-2	-1	[2]	---	---	---	-75	-76
6. 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 12/31/15).....	1/1/14	-75	-116	-234	-580	-1,049	-1,485	-1,749	-1,876	-1,992	-2,064	-2,127	-3,540	-13,347
7. Credit for construction of energy-efficient new homes (sunset 12/31/15).....	haa 12/31/13	-95	-192	-114	-55	-49	-42	-36	-23	-6	---	---	-547	-612
8. Special allowance for second generation biofuel plant property (sunset 12/31/15).....	ppisa 12/31/13	-1	-3	-2	[8]	[8]	[8]	[8]	[8]	[8]	[8]	[8]	-4	-1
9. Modifications of energy efficient commercial buildings deduction (sunset 12/31/15).....	ppisa 12/31/13	-107	-175	-58	7	6	6	5	4	3	3	2	-321	-304
10. Special rule for sales or dispositions to implement Federal Energy Regulatory Commission ("FERC") or State electric restructuring policy for qualified electric utilities (sunset 12/31/15).....	da 12/31/13	-232	-336	-45	105	105	105	105	105	72	19	---	-300	---

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
11. Excise tax credits and outlay payments for alternative fuel, and excise tax credits for alternative fuel mixtures (including extensions for liquefied hydrogen) (sunset 12/31/15).....	fsoua 12/31/13 & fsoua 9/30/14	-327	-453	-122	---	---	---	---	---	---	---	---	-903	-903
Total of Subtitle A. Provisions Expiring in 2013.....		-24,916	-112,884	-16,230	31,539	19,429	12,948	6,730	1,730	-573	-2,307	-2,830	-90,113	-87,361
Subtitle B. Provisions Expiring in 2014														
Part I - Energy Tax Extenders														
1. Alternative motor vehicle credit for qualified fuel cell motor vehicles (sunset 12/31/15).....	vpa 12/31/14	---	-30	-16	---	---	---	---	---	---	---	---	-47	-47
2. Alternative fuel refueling property ((including extension for hydrogen property) (sunset 12/31/15).....	ppisa 12/31/13	-23	-42	-19	-3	-2	-1	[8]	1	1	1	1	-92	-89
Part II - Extenders Relating to Multiemployer Defined Benefit Pension Plans														
1. Multiemployer defined benefit plans (sunset 12/31/15) [12].....	asa 12/31/14 & pyba 12/31/14	----- <i>Gain of less than \$500,000</i> -----												
Total of Subtitle B. Provisions Expiring in 2014.....		-23	-72	-35	-3	-2	-1	[8]	1	1	1	1	-139	-136
Subtitle C. Revenue Provisions														
1. Penalty for failure to meet due diligence requirements for the child tax credit [1].....	tyba 12/31/14	---	[8]	5	5	5	5	5	5	5	5	5	19	43
2. 100 percent continuous levy authority on payment to Medicare providers and suppliers.....	pmsma DOE	---	57	78	80	81	83	84	86	88	90	91	379	818
3. Exclusion from gross income of certain clean coal power grants.....	pri tyba 12/31/11	-35	-60	-52	-28	8	41	47	34	24	17	8	-126	4
4. Reform of rules related to qualified tax collection contracts [1].....	DOE	[8]	50	214	225	235	246	257	269	282	296	310	970	2,384
5. Special compliance personnel program.....	acarbsa DOE	----- <i>No Revenue Effect</i> -----												
6. Exclusion of dividends from controlled foreign corporations from the definition of personal holding company income for purposes of the personal holding company rules.....	tyeo/a DOE	[8]	1	1	1	1	1	2	2	2	2	2	7	15
7. Inflation adjustment for certain civil tax penalties under the Internal Revenue Code.....	rrtbfa 12/31/14	---	1	2	4	6	9	12	15	18	21	25	23	115
Total of Subtitle C. Revenue Provisions.....		-35	49	248	287	336	385	407	411	419	431	441	1,272	3,379
Total of Title I.		-24,974	-112,907	-16,017	31,824	19,763	13,332	7,137	2,143	-153	-1,875	-2,388	-88,981	-84,118
Title II. Tax Technical Corrections.....	various	----- <i>No Revenue Effect</i> -----												
Title III. Hire More Heroes - employees with health coverage under TRICARE or the Veterans Administration may be exempted from employer mandate under the Patient Protection and Affordable Care Act [13].....														
	mba 12/31/13	---	---	-64	-68	-72	-77	-82	-88	-93	-99	-104	-281	-748

Provision	Effective	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2014-19	2014-24
Sense of the Senate Committee on Finance To Express Support for Comprehensive Tax Reform.....	DOE	----- <i>No Revenue Effect</i> -----												
NET TOTAL		-24,974	-112,907	-16,081	31,756	19,690	13,255	7,055	2,055	-246	-1,974	-2,492	-89,262	-84,866

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be July 1, 2014. Revenue provisions as submitted in statutory draft MCG14285.

Legend for "Effective" column:

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|---|---|--|
| abiUSa = articles brought into the United States after | doia = discharge of indebtedness after | pma = payments made after |
| acarbsa = amounts collected and retained by the Secretary after | epoi = expenses paid or incurred in | pmsma = payments made six months after |
| apooa = amounts paid or accrued after | fpa = fuel produced after | ppisa = property placed in service after |
| apoi = amounts paid or incurred after | fsoua = fuel sold or used after | pri = payments received in |
| asa = applications submitted after | haa = homes acquired after | proaa = payments received or accrued after |
| cdf = credits determined for | ido/a = income determinations on or after | pyba = plan years beginning after |
| cma = contributions made after | ityeasd = in taxable years ending after such date | rtbfa = returns required to be filed after |
| cmbsa = coverage months beginning after | iwbwfta = individuals who begin work for the employer after | saa = stock acquired after |
| cmi = contributions made in | ma = months after | saua = sales and uses after |
| cpa = coal produced after | mba = months beginning after | tyba = taxable years beginning after |
| cyba = calendar years beginning after | oia = obligations issued after | tyeo/a = taxable years ending on or after |
| da = dispositions after | pa = periods after | vpa = vehicles purchased after |
| dmi = distributions made in | pca = productions commencing after | |

[1] Estimate includes the following outlay effects:	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2014-19</u>	<u>2014-24</u>
Health coverage tax credit.....	20	67	18	---	---	---	---	---	---	---	---	106	106
Increase in limit on cover over of rum excise tax revenues to Puerto Rico and the Virgin Islands [11].....	142	168	26	---	---	---	---	---	---	---	---	336	336
Penalty for failure to meet due diligence requirements for the child tax credit.....	---	---	-4	-4	-4	-4	-4	-4	-4	-4	-5	-17	-40
Reform of rules relating to qualified tax collection contracts.....	[14]	50	214	225	235	246	257	269	282	296	310	970	2,384
[2] Estimate includes the following effects:	<u>2014</u>	<u>2015</u>	<u>2016</u>	<u>2017</u>	<u>2018</u>	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2014-19</u>	<u>2014-24</u>
General Fund.....	-30	-70	-20	---	---	---	---	---	---	---	---	-120	-120
OASDI.....	-15	-35	-10	---	---	---	---	---	---	---	---	-60	-60

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

[4] Technical correction regarding Internal Revenue Code section 6431 effective as if included in section 310 of American Taxpayer Relief Act of 2012.

[5] Estimate includes interaction with section 179 and bonus depreciation.

[6] Estimate includes interaction with bonus depreciation.

[7] Estimate includes interaction with section 179.

[8] Gain of less than \$500,000.

[9] Effective for dividends paid with respect to any taxable year of regulated investment companies beginning after December 31, 2013.

[10] Effective for taxable years of foreign corporations beginning after December 31, 2013, and for taxable years of U.S. shareholders with or within which such taxable years of such foreign corporations end.

[11] Estimate provided by the Congressional Budget Office.

[12] Estimate is preliminary and subject to change.

[13] Estimate provided by the staff of the Joint Committee on Taxation and the Congressional Budget Office.

[14] Increase in outlays of less than \$500,000.