



JOINT COMMITTEE ON TAXATION

February 3, 2015

JCX-5-15

**DESCRIPTION OF AN AMENDMENT IN THE NATURE OF
A SUBSTITUTE TO THE PROVISIONS OF H.R. 644, THE
“FIGHTING HUNGER INCENTIVE ACT OF 2015”**

The Chairman’s amendment in the nature of a substitute modifies H.R. 644. The amendment replaces “5 succeeding years” with “5 succeeding taxable years” in describing the carryover rules for excess contributions (subsection 170(e)(3)(C)(iii)(I) of the Code, as added by the proposal). The amendment also clarifies the effective date of the proposal by providing that: (1) in general, the proposal is effective for contributions made after the date of enactment, in taxable years ending after such date; and (2) the increase in the percentage limit to 15 percent for food inventory contributions by C corporations and the related carryover and coordination rules for such contributions are effective for contributions made in taxable years ending after the date of enactment.

The following presents the estimated Federal fiscal year budget effects of the Chairman’s amendment.

Fiscal Years												
[Millions of Dollars]												
<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>2025</u>	<u>2015-20</u>	<u>2015-25</u>
-59	-160	-195	-202	-209	-216	-223	-231	-239	-248	-256	-1,041	-2,239

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