JOINT COMMITTEE ON TAXATION November 19, 2021 JCX-46-21

ESTIMATED BUDGET EFFECTS OF THE REVENUE PROVISIONS OF TITLE XIII - COMMITTEE ON WAYS AND MEANS, OF H.R. 5376, THE "BUILD BACK BETTER ACT," AS PASSED BY THE HOUSE OF REPRESENTATIVES

Fiscal Years 2022 - 2031

[Millions of Dollars]

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE E - INFRASTRUCTURE FINANCING AND													
COMMUNITY DEVELOPMENT													
Part 1 - Low Income Housing Credit													
1. Increases in State allocations	cyba 12/31/21	-3	-20	-73	-252	-345	-359	-326	-264	-228	-213	-693	-2,083
2. Tax-exempt bond financing requirement (sunset 12/31/26)	[1]	-57	-200	-424	-736	-1,010	-1,062	-1,226	-1,291	-1,305	-1,307	-2,426	-8,617
3. Buildings designed to serve extremely low-income													
households	[2]	-7	-31	-75	-130	-183	-227	-275	-319	-362	-416	-426	-2,025
4. Repeal of qualified contract option	DOE	2	7	16	27	38	49	60	72	84	101	91	457
5. Modification and clarification of rights relating to													
building purchase	[3]	2	8	18	32	45	59	74	88	103	124	105	553
Total of Part 1 - Low Income Housing Credit		-63	-236	-538	-1,058	-1,454	-1,540	-1,693	-1,715	-1,708	-1,712	-3,349	-11,716
Part 2 - Neighborhood Homes Investment Act	tyba 12/31/21	-192	-481	-1061	-1170	-1177	-1086	-494	-198			-4,082	-5,859
Part 3 - Investments in Tribal Infrastructure													
1. Treatment of Indian Tribes as States with respect to													
bond issuance	oii cyba DOE	[4]	-1	-3	-4	-6	-8	-10	-12	-15	-17	-14	-77
2. New markets tax credit for Tribal Statistical Areas	cya 12/31/21		[4]	-2	-6	-13	-21	-29	-34	-37	-36	-22	-178
3. Inclusion of Indian areas as difficult development	•												
areas for purposes of certain buildings	bpisa 12/31/21	[4]	-2	-4	-8	-11	-13	-16	-18	-21	-24	-25	-117
Total of Part 3 - Investments in Tribal Infrastructure		[4]	-3	-9	-18	-30	-42	-55	-64	-73	-77	-61	-372
Part 4 - Other Provisions													
Possessions economic activity credit	[5]	-406	-853	-938	-1.017	-1.091	-1.169	-1.229	-1.270	-1.312	-1,356	-4,305	-10,641
2. Tax treatment of certain assistance to farmers, etc	[6] -				,	e to be Pro	vided by the	Congress	ional Budge	,-			
3. Exclusion of amounts received from State-based	F.,1									35,100			
catastrophe loss mitigation programs	tyba 12/31/20	-8	-10	-10	-11	-12	-13	-14	-15	-16	-17	-52	-126
Total of Part 4 - Other Provisions		-414	-863	-948	-1,028	-1,103	-1,182	-1,243	-1,285	-1,328	-1,373	-4,357	-10,767
TOTAL OF SUBTITLE E - INFRASTRUCTURE FINANCING A													
COMMUNITY DEVELOPMENT		-668	-1,583	-2,556	-3,274	-3,764	-3,850	-3,485	-3,262	-3,109	-3,162	-11,848	-28,715

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE F - GREEN ENERGY													
THE "GROWING RENEWABLE ENERGY AND EFFICIENCY	•												
NOW (GREEN') ACT OF 2021"													
Part 1 - Renewable Electricity and Reducing Carbon Emissions													
1. Extension and modification of credit for electricity													
produced from certain renewable resources (sunset	fpisa 12/31/21 &												
12/31/26) [7]	ftcowba 12/31/21	-331	-1,087	-1,983	-3,014	-4,380	-5,846	-7,489	-9,306	-10,470	-10,981	-10,795	-54,887
2. Extension and modification of energy credit (sunset 12/31/26) [7]	generally ppisa 12/31/21	-769	-1,380	-1,565	-2,655	-5,946	-7,557	-7,587	-7,795	-8,194	-8,633	-12,315	-52,081
3. Increase in energy credit for solar facilities placed in service	;												
in connection with low-income communities (sunset													
12/31/26)	1/1/22					Estimat	e Included	in Item F.1	.2. Above-				
4. Elective payment for energy property and electricity													
produced from certain renewable resources, etc	tyba 12/31/21 -				Estin	nate Include	ed in Items	F.1.1. thro	ugh F.1.3.	Above			
5. Investment credit for electric transmission property	ppisa 12/31/21 &												
(sunset 12/31/31) [7]	ptcowba 12/31/21				-788	-1,213	-1,213	-1,213	-2,001	-2,426	-2,425	-2,001	-11,279
6. Extension and modification of credit for carbon oxide													
sequestration (sunset 12/31/31)	foetcowba 12/31/21	-26	-103	-276	-426	-450	-222	-141	-161	-162	-160	-1,281	-2,128
7. Green energy publicly traded partnerships	•	-148	-126	-137	-144	-99	-50	-56	-64	-72	-80	-654	-975
8. Zero-emission nuclear power production credit	epasa 12/31/21												
(sunset 12/31/27) [7]	itybasd	-4,383	-2,909	-3,253	-3,524	-3,710	-3,838	-1,357				-17,779	-22,975
Total of Part 1 - Renewable Electricity and Reducing Carbon En	missions	-5,657	-5,605	-7,214	-10,551	-15,798	-18,726	-17,843	-19,327	-21,324	-22,279	-44,825	-144,324
Part 2 - Renewable Fuels													
Extension of incentives for biodiesel, renewable diesel													
and alternative fuels (sunset 12/31/26)	fsoua 12/31/21	-149	-2,688	-3,721	-3,802	-3,816	-1,028					-14,177	-15,205
Extension of second generation biofuel incentives	15044 12/51/21	117	2,000	3,721	3,002	3,010	1,020					11,177	13,203
(sunset 12/31/26)	qsgbpa 12/31/21	-10	-19	-20	-22	-24	-11					-95	-106
3. Sustainable aviation fuel credit (sunset 12/31/26)	fsoua 12/31/22		-7	-16	-24	-29	-13					-76	-90
4. Credit for production of clean hydrogen [7]	[8]	-70	-195	-347	-550	-785	-1,027	-1,283	-1,565	-1,681	-1,690	-1,947	-9,193
Total of Part 2 - Renewable Fuels		-229	-2,909	-4,104	-4,398	-4,654	-2,079	-1,283	-1,565	-1,681	-1,690	-16,295	-24,594
			_,, 0,	.,	1,000	1,00	_,0	1,200	1,000	1,001	1,000	10,2>0	- 1,0> 1
Part 3 - Green Energy and Efficiency Incentives for Individuals													
1. Extension, increase, and modifications of	generally												
nonbusiness energy property credit (sunset	ppisa 12/31/21 &												
12/31/31)	apoia 12/31/21	-259	-1,681	-1,427	-1,402	-1,424	-1,405	-1,352	-1,377	-1,391	-1,405	-6,193	-13,123
2. Extension and modification of residential energy efficient													
property credit (sunset 12/31/31)	ema DOE	-46	-514	-1,216	-3,012	-3,098	-3,188	-3,283	-3,378	-3,459	-3,563	-7,886	-24,756
3. Energy efficient commercial buildings deduction	tyba 12/31/21 &												
(sunset 12/31/31)	ppisa 12/31/21 ityeasd	-18	-72	-70	-68	-67	-66	-65	-66	-67	-69	-295	-626
4. Extension, increase, and modifications of new													
energy efficient home credit (sunset 12/31/31)	duaa 12/31/21	-132	-233	-258	-271	-289	-307	-321	-320	-305	-289	-1,182	-2,724
5. Modifications to income exclusion for conservation													
3. Wodifications to income exclusion for conscivation													

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
6. Credit for qualified wildfire mitigation expenditures	epoia DOE ityeasd	-12	-28	-31	-36	-42	-44	-46	-48	-49	-50	-149	-387
Total of Part 3 - Green Energy and Efficiency Incentives for Indi	viduals	-473	-2,530	-3,004	-4,792	-4,924	-5,015	-5,073	-5,195	-5,278	-5,383	-15,722	-41,664
Part 4 - Greening the Fleet and Alternative Vehicles													
 Refundable new qualified plug-in electric drive motor vehicle credit for individuals (sunset 12/31/31) [7] Credit for previously-owned qualified plug-in electric drive 	vaa 12/31/21 & vaa 12/31/22	-96	-494	-576	-709	-832	-1,001	-1,171	-1,304	-1,447	-1,559	-2,709	-9,192
motor vehicles (sunset 12/31/31)	vaa 12/31/21	-33	-104	-119	-150	-166	-183	-202	-224	-247	-269	-572	-1,696
3. Qualified commercial electric vehicles (sunset 12/31/31)	vaa 12/31/21	-79	-171	-235	-303	-396	-516	-624	-717	-808	-914	-1,184	-4,762
4. Qualified fuel cell motor vehicles (sunset 12/31/31)	ppisa 12/31/21	-4	-7	-8	-9	-11	-4					-40	-44
5. Alternative fuel refueling property credit (sunset													
12/31/31)	ppisa 12/31/21	-93	-404	-461	-523	-591	-666	-749	-837	-932	-1,027	-2,072	-6,283
6. Reinstatement and expansion of employer-provided fringe	4 1 12/21/21	20	21	22	2.4	16	1.6	1.0	10	10	10	102	104
benefits for bicycle commuting [9]	tyba 12/31/21	-20	-21	-23	-24	-16	-16	-18	-18	-19	-19	-103	-194
7. Credit for certain new electric bicycles (sunset 12/31/25)	ppisa 12/21/21 ityeasd	-254	-683	-889	-1,157	-1,126	-8	-7	-6	-6	-4	-4,108	-4,139
Total of Part 4 - Greening the Fleet and Alternative Vehicles	•••••••••••••••••••••••••••••••••••••••	-579	-1,884	-2,311	-2,875	-3,138	-2,394	-2,771	-3,106	-3,459	-3,792	-10,788	-26,310
Part 5 - Investment in the Green Workforce													
Extension of the advanced energy project credit [7][10] Labor costs of installing mechanical insulation property	1/1/22	-1,476	-2,053	-1,184	-787	-796	-528	-380	-240	-169	-36	-6,296	-7,649
(sunset 12/31/25)	apoia 12/31/21 ityeasd	-371	-745	-939	-1,099	-813	-532	-480	-428	-326	-207	-3,967	-5,940
3. Advanced manufacturing investment credit (sunset 12/31/25) [7]	[11]	-1,501	-2,706	-2,931	-2,842	-913	115	130	145	151	157	-10,895	-10,197
4. Advanced manufacturing production credit	10/01/01		225	2.40		404				4.0			
(sunset 12/31/29) [7]	cpasa 12/31/21	-214	-336	-348	-372	-401	-353	-256	-151	-40		-1,672	-2,472
Total of Part 5 - Investment in the Green Workforce		-3,562	-5,840	-5,402	-5,100	-2,923	-1,298	-986	-674	-384	-86	-22,830	-26,258
Part 6 - Qualified Environmental Justice Credit (sunset													
12/31/31) [7][10]	1/1/22		-400	-700	-800	-900	-1,000	-1,000	-1,000	-1,000	-1,000	-2,800	-7,800
Part 7 - Reinstatement of Superfund	7/1/22	290	1,229	1,280	1,323	1,357	1,390	1,424	1,459	1,494	1,530	5,479	12,776
Part 8 - Incentives for Clean Electricity and Clean Transportation	n												
Clean electricity production credit [7]	[12]							-19	-546	-1,878	-3,558		-6,002
2. Clean electricity investment credit [7]	[12]						-723	-1,082	-8,774	-13,127	-13,519		-37,225
3. Increase in clean electricity investment credit for facilities													
placed in service in connection with low-income													
communities	1/1/27 -					Estimate	Included i	n Item F.8.	2. Above -				
Cost recovery for qualified facilities, qualified property, and													
grid improvement property	fappisa 12/31/26						-26	-83	-134	-171	-211		-624
5. Clean fuel production credit [7]	tfpa 12/31/26						-1,499	-2,104	-2,204	-2,320	-1,590		-9,716
Total of Part 8 - Incentives for Clean Electricity and Clean Trans						-2,248	-3,288	-11,659	-17,496	-18,878		-53,567	
TOTAL OF SUBTITLE F - GREEN ENERGY	-10,210	-17,940	-21,456	-27,193	-30,980	-31,369	-30,819	-41,067	-49,128	-51,578	-107,782	-311,741	

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE G - SOCIAL SAFETY NET Part 1 - Child Tax Credit: Extend and modify ARP modifications to CTC, income lookback for phase out, expanded safe harbor, fully advanced credit with MAGI limit, no child SSN requiremen (sunset 12/31/22); no child SSN requirement, full refundability of CTC (not the \$500 credit) (taxable years beginning after	t												
12/31/22) [7]	tyba 12/31/21	-101,390	-28,936	-12,236	-11,714	-12,669	-3,604	-3,527	-3,503	-3,515	-3,551	-166,945	-184,646
Part 2 - Earned Income Tax Credit													
Certain improvements to the earned income tax credit													
extended through 2022 [7]	tyba 12/31/21	-578	-12,693									-13,271	-13,271
2. Funds for administration of earned income tax credits in the	•											ŕ	,
territories [7]	pmf cyba 12/31/21		-5	-5	-5	-5	-5	-5	-5	-5	-5	-20	-45
Total of Part 2 - Earned Income Tax Credit		578	-12,698	-5	-5	-5	-5	-5	-5	-5	-5	-13,291	-13,316
Part 3 - Expanding Access to Health Coverage and													
Lowering Costs													
Improve affordability and reduce premium costs of													
health insurance for consumers (sunset 12/31/25)	tyba 12/31/21				Estimat	e to be Prov	vided by the	Congressi	onal Rudge	et Office			
2. Modification of employer sponsored coverage affordability	0,000 12/01/21				2500000		incu oy inc	co.,g. coo.	onar Bunge	i ojjiec			
test in health insurance premium tax credit (sunset													
12/31/25)	tyba 12/31/21				Estimat	e to be Prov	vided by the	Congressi	onal Budge	et Office			
3. Treatment of lump-sum Social Security benefits in	·						•	Ü	Ü	00			
determining household income	tyba 12/31/21				Estimat	e to be Prov	vided by the	Congressi	onal Budge	et Office			
4. Temporary expansion of health insurance premium tax	-						-	_	_				
credits for certain low-income populations (sunset 12/31/25)													
[13]	tyba 12/31/21				Estimat	e to be Prov	vided by the	Congressi	onal Budge	et Office			
5. Special rule for individuals receiving unemployment													
compensation (sunset 12/31/22)	tyba 12/31/21				Estimat	e to be Prov	vided by the	Congressi	onal Budge	et Office			
6. Permanent credit for health insurance costs [7]	cmba 12/31/21	-8	-18	-19	-20	-31	-44	-47	-49	-52	-56	-96	-344
7. Exclusion of certain dependent income for purposes of													
premium tax credit (sunset 12/31/26)	tyba 12/31/22				Estimat	e to be Prov	vided by the	Congressi	onal Budge	et Office			
8. Requirements with respect to cost-sharing for certain insulin													
products	pybo/a 1/1/23												
9. Oversight of pharmacy benefit manager services	pybo/a 1/1/23				Estimat	e to be Prov	vided by the	Congressi	onal Budge	et Office			
Total of Part 3 - Expanding Access to Health Coverage and													
Lowering Costs		8	-18	-19	-20	-31	-44	-47	-49	-52	-56	-96	-344
Part 4 - Pathway to Practice Training Programs -													
Establishing rural and underserved pathway to practice training programs for post-baccalaureate students, medical students,													
and medical residents [7]	tyba DOE			-74	-165	-262	-387	-589	_Q11	-1.136	-1,420	-500	-4,877
and incurcal restuents [7]	typa DOE			-/ -	-103	-202	-30/	-307	-044	-1,130	-1,420	-300	-4,0 / /

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
Part 5 - Higher Education													
Credit for public university research infrastructure	qccma 12/31/21	-33	-37	-36	-36	-26	-9					-168	-177
2. Treatment of Federal Pell Grants for income tax purposes	•												
(sunset 12/31/25) [7]	tyba 12/31/21	-6	-229	-225	-215	-205						-880	-880
3. Repeal of denial of American Opportunity Tax Credit on													
basis of felony drug conviction [7]	tyba 12/31/21	-3	-21	-21	-20	-20	-20	-20	-19	-18	-18	-85	-180
Total of Part 5- Higher Education		-42	-287	-282	-271	-251	-29	-20	-19	-18	-18	-1,133	-1,237
Part 6 - Limit Itemized Deductions for State and Local Taxes to													
\$80,000	tyba 12/31/20	-52,133	-51,827	-54,028	-56,277	-15,733	44,182	40,129	41,607	43,198	75,677	-229,998	14,795
TOTAL OF SUBTITLE G - SOCIAL SAFETY NET		-154,151	-93,766	-66,644	-68,452	-28,951	40,113	35,941	37,187	38,472	70,627	-411,963	-189,625
SUBTITLE H - RESPONSIBLY FUNDING OUR PRIORITIES													
Part 1 - Corporate and International Tax Reforms													
A. Corporate Provisions													
Corporate alternative minimum tax	tyba 12/31/22	4,481	55,753	49,165	32,588	24,695	22,747	25,789	30,535	34,969	38,189	166,682	318,911
Excise tax on repurchase of corporate stock	rosa 12/31/21	8,212	11,782	12,011	12,343	13,149	13,632	13,569	13,208	13,051	13,267	57,497	124,226
B. Limitations on Deduction for Interest Expense	tyba 12/31/22	´	1,520	3,123	3,285	3,254	3,173	3,279	3,398	3,435	3,430	11,182	27,896
C. Outbound International Provisions	•		,	,	,		Ź		ĺ	,	Ź	,	,
1. Modifications to deduction for foreign-derived													
intangible income and global intangible low-taxed income	[14]		12,597	26,422	28,687	20,624	11,481	11,432	11,109	11,000	10,926	88,330	144,278
2. Repeal of election for 1-month deferral in determination				ŕ		ŕ	ŕ	ŕ	ŕ	ŕ	ŕ		
of taxable year of specified foreign corporations	tyosfcba 11/30/22		3,353	3,353	[15]							6,706	6,706
3. Modifications of foreign tax credit rules applicable to certain	1												
taxpayers receiving specific economic benefits	apoaa 12/31/21	217	438	469	619	802	769	903	941	772	791	2,545	6,721
4. Modifications to foreign tax credit limitations	[16]	-18	698	1,621	2,010	2,006	1,597	1,207	966	850	1,064	6,317	12,000
5. Foreign oil and gas extraction income and foreign oil													
related income to include oil shale and tar sands	tyba 12/31/21					- Estimate	Included in	n Item H.1.	C.6. Below				
6. Modifications to inclusion of global intangible	•												
low-taxed income	[17]	150	1,273	4,102	6,175	5,997	5,896	6,837	8,022	8,838	9,691	17,697	56,980
7. Modifications to determination of deemed paid credit													
for taxes properly attributable to tested income	[18]		-1,514	-3,155	-3,250	-3,057	-3,022	-3,194	-3,350	-3,397	-3,255	-10,976	-27,194
8. Deduction for foreign source portion of dividends limited to													
controlled foreign corporations, etc	[19]	21	42	44	45	46	48	49	51	52	54	198	451
9. Limitation on foreign base company sales and													
services income	[20]	9	814	1,754	1,913	1,534	1,144	1,162	1,190	1,232	1,287	6,025	12,041
D. Inbound International Provisions													
1. Modifications to base erosion and anti-abuse tax	tyba 12/31/21	-1,633	-2,531	1,529	7,233	9,260	9,412	10,191	10,578	11,144	11,904	13,858	67,088
E. Other Business Tax Provisions													
1. Credit for clinical testing of orphan drugs limited to first													
use or indication	tyba 12/31/21	88	186	208	234	260	286	314	346	380	418	975	2,720
2. Modifications to treatment of certain	lai tyba 12/31/21 &												
losses	lo/a DOE	25	165	172	179	186	193	201	209	217	226	726	1,773
3. Adjusted basis limitation for divisive reorganization	roo/a DOE	689	1,294	1,769	1,917	1,944	1,975	2,006	2,037	2,069	2,103	7,613	17,803

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
4. Rents from prison facilities not treated as qualified													
income for purposes of REIT income tests	tyba 12/31/21	5	9	10	10	6	3	3	3	3	3	40	55
5. Modifications to exemption for portfolio interest	oia DOE	576	876	405	118	25	20	16	13	10	8	2,000	2,067
6. Certain partnership interest derivatives	pma 12/31/22	4	9	9	9	9	10	10	10	10	10	41	90
7. Adjustments to earnings and profits of controlled													
foreign corporations	[21]	150	325	375	425	475	525	575	625	675	725	1,750	4,875
8. Certain dividends from controlled foreign corporations to													
United States shareholders treated as extraordinary													
dividends	[22]					- Estimate	Included i	n Item H.1.	C.4. Above				
9. Limitation on certain special rules for section 1202	generally												
gains	saeoa 9/13/21	69	470	517	572	639	698	705	710	677	661	2,267	5,718
10. Constructive sales	generally csa DOE					- Estimate	Included in	n Item H.1.	E.12. Below				
11. Rules relating to common control	tyba 12/31/21	628	1,267	1,276	1,313	1,434	1,601	1,788	2,011	2,248	2,457	5,919	16,023
12. Modification of wash sale rules	sdata 12/31/21	3,226	4,946	2,725	1,626	1,074	804	653	587	562	559	13,597	16,762
13. Research and experimental expenditures													
(sunset 12/31/25)	DOE	-29,091	-39,856	-32,161	-24,133	19,284	38,009	29,958	19,853	9,269	4,851	-105,956	-4,016
Total of Part 1 - Corporate and International Tax Reforms		-12,192	53,916	75,743	73,918	103,646	111,001	107,453	103,052	98,066	99,369	295,033	813,974
Part 2 - Tax Increases for High-Income Individuals													
1. Application of net investment income tax to trade or													
business income of certain high income individuals	tyba 12/31/21	12,742	19,543	21,734	24,050	25,861	27,966	28,997	29,675	30,439	31,156	103,930	252,163
2. Limitations on excess business losses of noncorporate	.,	,,	,	,,	,			,	,,,,,	,,	,	,	,
taxpayers made permanent, with carryforward													
modification	tyba 12/31/20	3,127	2,046	2,123	2,204	2,288	21,665	31,221	30,130	31,909	33,563	11,788	160,276
3. Surcharge on high income individuals, estates, and trusts	,	-, .	,	, -	, -	,	,	- ,	,	- ,	/	,	
(initial surtax on AGI of 5% in excess of \$10,000,000 and													
additional surtax of 3% on AGI in excess of \$25,000,000)	tyba 12/31/21	40,035	-18,667	22,215	23,436	24,332	24,223	25,465	27,540	28,779	30,413	91,350	227,771
Total of Part 2 - Tax Increases for High-Income Individuals		55,904	2,922	46,072	49,690	52,481	73,854	85,683	87,345	91,127	95,132	207,068	640,210
Part 3 - Modifications of Rules Relating to Retirement Plans A. Limitations on High-Income Taxpayers with Large													
Retirement Account Balances													
Contribution limit for individual retirement plans of	tyba 12/31/28 &												
high-income taxpayers with large account balances						- Fstimate	Included in	1 Itom H 3	4.2 Relow -				
Increase in minimum required distributions for	pyou 12/31/20					- Lsumaie	тистичей т	i item 11.5.	1.2. Delow -				
high-income taxpayers with large retirement account	tyba 12/31/28 &												
balancesbalances	pyba 12/31/28								3,269	2,713	1,362		7,344
B. Other Provisions Relating to Individual Retirement Plans	pyou 12/31/20	-				-	-		3,207	2,113	1,502		7,277
Tax treatment of rollovers to Roth IRAs and													
accounts	[23]	73	151	177	195	211	227	239	251	322	878	808	2,724
Statute of limitations with respect to IRA noncompliance	[24]	[15]	1	1	1	1	1	1	1	1	1	3	7
3. IRA owners treated as disqualified persons for purposes of	r1	[10]	1	1	-	•	•		•	•	•	J	•
prohibited transaction rules	toa 12/31/21		1	1	1	1	1	2	2	2	2	5	13
			_										
Total of Part 3 - Modifications of Rules Relating to Retirement P	Tans	73	153	179	196	213	229	241	3,522	3,038	2,242	815	10,087

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
Part 4 - Funding the Internal Revenue Service and Improving													
Taxpayer Compliance													
1. Enhancement of Internal Revenue Service resources	DOE -				Estimat	e to be Pro	vided by th	e Congress	ional Budg	et Office - ·			
2. Application of backup withholding with respect to third													
party network transactions	cyba 12/31/21	-2	-1	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	-3	-4
3. Modification of procedural requirements relating to													
assessment of penalties	[25]	201	221	113	116	119	122	125	128	132	135	771	1,414
Total of Part 4 - Funding the Internal Revenue Service and													
Improving Taxpayer Compliance		199	220	113	116	119	122	125	128	132	135	768	1,410
Part 5 - Other Provisions													
1. Modifications to limitation on deduction of excessive													
employee remuneration	tyba 12/31/21	315	639	656	674	683	692	868	881	893	905	2,966	7,205
2. Extension of tax to fund Black Lung Disability Trust	•												
Fund [26]	sa 12/31/21	101	137	135	131	32						536	536
3. Prohibited transactions relating to holding DISC or FSC in													
individual retirement account	saoiaoho/a 12/31/21	39	95	126	157	187	217	249	277	292	301	605	1,940
4. Clarification of treatment of DISC gain and distributions of													
certain foreign shareholders	goda 12/31/21	41	86	92	95	96	97	99	101	103	106	410	915
5. Treatment of certain qualified sound recording productions													
[27]	pci tyea DOE	-310	-59	6	43	112	86	43	21	11	12	-208	-35
6. Payment to certain individuals who dye fuel	[28]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	[4]	-2	-4
7. Treatment of financial guaranty insurance companies as													
qualifying insurance corporations under passive foreign	tyba 12/31/17 &												
investment company rules	rma DOE	[4]	-2	-4	-5	-8	-9	-12	-14	-14	-14	-18	-81
8. Extension of period of limitation for certain legally married													
couples	DOE	-33	-22									-55	-55
9. Allow an above-the-line deduction of up to \$250 in union													
dues paid (sunset 12/31/25)	tyba 12/31/21	-66	-442	-442	-443	-377						-1,770	-1,770
10. Temporary increase in employer-provided child care credit													
(sunset 12/31/25)	tyba 12/31/21	-30	-41	-42	-43	-11						-166	-166
11. Payroll credit for compensation of local news journalists													
(sunset 12/31/26)	cqba DOE	-207	-366	-310	-308	-320	-162					-1,511	-1,674
12. Allow an above-the-line deduction of up to \$250 for													
employee uniforms (sunset 12/31/24)	tyba 12/31/21	-111	-742	-756	-650							-2,259	-2,259
13. Expenses in contingency fee cases	apiori tyba DOE	-172	-659	-532	-390	-231	-101	-105	-101	-95	-66	-1,985	-2,453
14. Increase in research credit against payroll tax for small													
businesses	tyba 12/31/21	-51	-81	-85	-89	-94	-98	-102	-107	-111	-113	-401	-932
15. Imposition of tax on nicotine	[29]	180	1129	1173	1126	1028	940	865	792	720	654	4,635	8,606
16. Termination of employer credit for paid family and medical													
leave [30]	tyba 12/31/23			101	219	168	77	44	26	7		489	642
Total of Part 5 - Other Provisions		-304	-328	118	517	1,265	1,740	1,949	1,876	1,806	1,785	1,266	10,415
TOTAL OF SUBTITLE H - RESPONSIBLY FUNDING OUR PR	IORITIES	43,680	56,883	122,225	124,437	157,725	186,945	195,452	195,923	194,169	198,663	504,950	1,476,096

Provision	Effective	2022	2023	2024	2025	2026	2027	2028	2029	2030	2031	2022-26	2022-31
SUBTITLE I - DRUG PRICING: Selected Drug Manufacturer Excise Tax Imposed During Noncompliance Periods	. sa DOE						- No Reve	nue Effect					
NET TOTAL		121,349	-56,406	31,569	25,519	94,030	191,839	197,088	188,781	180,404	214,550	-26,643	946,015
Joint Committee on Taxation													
NOTE: Details may not add to totals due to rounding. The date of en	actment is assumed to	o be Decembe	er 1, 2021.										
Legend for "Effective" column:													
apiori = amounts paid, incurred, or received in		fpisa = faci	lities placed	d in service	after				roo/a = reo	rganization	s occurring	on or after	
apoia = amounts paid or incurred after		fsoua = fue								irchases of			
apoaa = amounts paid or accrued after		ftcowba = f	acilities the	e constructi	on of which	begins aft	er		_	rts made af			
ara = amounts received after		goda = gair				J						ons made aft	er
bpisa = buildings placed in service after		itybasd = ir				h date					ond genera		
cpasa = components produced and sold after		ityeasd = in	-	_	-					tion after	C		
cqba = calendar quarters beginning after		lai = losses	-	Ü					sa = sales a	after			
csa = constructive sales after		lii = losses	incurred in						saeoa = sal	es and excl	nanges only	after	
cya = calendar years after		lo/a = liqui	dations on o	or after					saoiaoho/a	= stock and	d other inter	ests acquired	l or held
cyba = calendar years beginning after		oia = obliga	ations issue	d after					on or afte	r		•	
da = days after		oii = obliga	tions issued	d in					sdata = sale	es, dispositi	ons, and ter	minations af	ter
DOE = date of enactment		pa = period	s after							_	uel produce		
duaa = dwelling units acquired after		pci = produ	ctions com	mencing in					-	actions occi	-		
ema = expenditures made after		pmf = payn	nents made	for					too/a = trai	nsfers occui	ring on or a	ıfter	
epasa = electricity produced and sold after		pma = payr	nents made	after							eginning aft		
epoia = expenditures paid or incurred after				•	ble years ei	-							
fappisa = facilities and property placed in service after ptcowba = property the construction of which tyosfcba = taxal												ied foreign co	orporations
foetcowba = facilities or equipment the construction of		begins aft	er						beginning	after	•	-	-
which begins after		pybo/a = pl		ginning on	or after					cles acquire	d after		

- [1] Effective for buildings some portion of which, or of the land on which the building is located, is financed by an obligation which is described in section 42(h)(4)(A) and which is part of an issue the issue date of which is after December 31, 2021.
- [2] Effective for allocations of housing credit dollar amount after December 31, 2021, and for buildings that are described in section 42(h)(4)(B) taking into account only obligations that are part of an issue the issue date of which is after December 31, 2021.
- [3] The amendments made by subsections (a) and (c) shall apply to agreements entered into or amended after the date of the enactment. The amendments made by subsection (b) shall apply to agreements among the owners of the project (including partners, members, and their affiliated organizations) and persons described in section 42(i)(7)(A) of the Internal Revenue Code of 1986 entered in of the Internal Revenue Code of 1986 entered into before, on, or after the date of the enactment.
- [4] Loss of less than \$500,000.
- [5] Applies to taxable years beginning after the date of the enactment of this Act, and in the case of a qualified corporation that is foreign corporation, to taxable years beginning after the date of enactment and to taxable years of United States shareholders in which or with which taxable years of foreign corporations end. The credit is not available for taxable years beginning after December 31, 2031.
- [6] Effective as if included in sec. 1005 of the American Rescue Plan Act of 2021 (Public Law 117-2).
- [7] Estimate contains the following outlay effects: 2023 2024 2025 2026 2027 2028 2029 2030 2031 2022-26 2022-31 Credit for electricity produced from certain renewable resources (sunset /12/31/26)...... 281 825 2,008 2,712 4,229 87 498 1,375 3,489 5,064 3,066 20,568 Extension and modification of energy credit (sunset 12/31/26)..... 369 663 751 1,274 2,854 3,627 3,642 3,741 3,933 4,144 5,911 24,999 Investment credit for electric transmission property (sunset 12/31/31)..... 328 504 504 504 832 353 832 3,024

Footnotes for JCX-46-21 continued:

[7] Estimate contains the following outlay effects (continued):	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	2029	<u>2030</u>	2031	<u>2022-26</u>	2022-31
Zero-emission nuclear power production credit (sunset 12/31/27)	2,104	1,396	1,562	1,692	1,781	1,842	651				8,534	11,028
Credit for production of clean hydrogen.	34	87	143	220	311	409	518	640	684	677	795	3,723
Refundable new qualified plug-in electric drive motor vehicle credit for individuals												
(sunset 12/31/31)	55	62	70	82	98	117	130	145	159	159	367	1,077
Extension of the advanced energy project credit.	708	986	569	378	382	253	183	115	81	17	3,022	3,672
Advanced manufacturing investment credit (sunset 12/31/25)	627	1,130	1,223	1,186	1,116	349					5,282	5,632
Advanced manufacturing production tax credit (sunset 12/31/29)	93	147	152	162	175	154	112	66	17		730	1,079
Qualified environmental justice credit (sunset 12/31/31)		380	665	760	855	950	950	950	950	950	2,660	7,410
Clean electricity production credit.							9	262	901	1,708		2,881
Clean electricity investment credit.						347	519	4,212	6,301	6,489		17,868
Clean fuel production credit.						720	1,010	1,058	1,113	763		4,664
Child tax credit.	78,647	21,355	12,236	11,714	12,669	3,604	3,527	3,503	3,515	3,551	136,621	154,322
Certain improvements to the earned income tax credit extended through 2022		10,381									10,381	10,381
Funds for administration of earned income tax credits in the territories		5	5	5	5	5	5	5	5	5	20	45
Permanent credit for health insurance costs.	5	7	8	8	15	18	19	20	21	22	43	143
Federal Pell Grants excluded from gross income.		167	159	153	150						629	629
Repeal of denial of American Opportunity Tax Credit on basis of felony drug												
conviction		6	6	6	6	6	6	5	5	5	23	50
Establishing rural and underserved pathway to practice training programs for												
post-baccalaureate students, medical students, and medical residents [31]			37	82	131	205	370	614	899	1,176	250	3,514
[8] Effective for hydrogen produced after December 31, 2021, at facilities for which construct	ction comm	enced on o	r before De	ecember 31,	2028; for f	acilities the	construction	on of which	begins aft	er Decemb	er 31, 2021,	
for electricity produced after December 31, 2021, for property placed in service after Dec	ember 31	2021 and	for any pro	nerty the co	nstruction of	of which be	oins prior t	o Ianuary 1	2022 onl	v to the ex	tent of the	

[8] Effective for hydrogen produced after December 31, 2021, at facilities for which construction commenced on or before December 31, 2028; for facilities the construction of which begins after December 31, 2021, for electricity produced after December 31, 2021, for property placed in service after December 31, 2021, and, for any property the construction of which begins prior to January 1, 2022, only to the extent of the basis thereof attributable to the construction, or erection after December 31, 2026.

[9] Estimate includes the following budget effects:	<u>2022</u>	2023	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	2028	<u>2029</u>	<u>2030</u>	2031	<u>2022-26</u>	<u>2022-31</u>
Total Revenue Effect	-20	-21	-23	-24	-16	-16	-18	-18	-19	-19	-103	-194
On-budget effects	-12	-13	-14	-15	-9	-10	-10	-11	-11	-12	-63	-117
Off-budget effects	-8	-8	-9	-9	-6	-7	-7	-7	-8	-8	-40	-77

- [10] Annual base allocation amounts end 2031, unused amounts may be reallocated through 2036.
- [11] Effective for property placed in service after December 31, 2021, and, for any property the construction of which begins prior to January 1, 2022, only to the extent of the basis thereof attributable to the construction, reconstruction, or erection after December 31, 2021.
- [12] Effective for property placed in service after December 31, 2026, and, for any property the construction of which begins prior to January 1, 2027, only to the extent of the basis thereof attributable to the construction, reconstruction, or erection after December 31, 2026.
- [13] For purposes of this subsection, the term 'termination date' means the later of January 1, 2025, or the date on which the Secretary of Health and Human Services makes a written certification to the Secretary that the Secretary of Health and Human Services has fully implemented the program described in section 1948.
- [14] Generally applies to tyba 12/31/22, except that certain other modifications apply to taxable years beginning after the date of enactment.
- [15] Gain of less than \$500,000.
- [16] Generally effective for taxable years beginning after December 31, 2022, with the following exceptions: changes with respect to foreign tax credit carryback or carryover are effective for taxes paid or accrued in taxable years beginning after December 31, 2022; changes to the treatment of certain asset dispositions are generally effective for transactions after the date of enactment; changes to elections of claims or deductions are effective for taxes paid or accrued for taxable years beginning after December 31, 2021; changes related to redeterminations of foreign taxes are effective for changes that occur 60 days or more after DOE; and changes to the special limitations period are effective for taxes paid, accrued or deemed paid in in taxable years beginning after December 31, 2021.

Footnotes for JCX-46-21 continued:

- [17] Generally applies to taxable years of foreign corporations beginning after December 31, 2022, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end, except that changes to regulatory authority and coordination with other provisions apply to taxable years of foreign corporations beginning after date of enactment, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [18] Generally applies to taxable years of foreign corporations beginning after December 31, 2021 2022, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end, except that changes to the application of the foreign tax credit limitation to amounts included under section 78 and the disallowance of foreign tax credit and deduction with respect to distributions of previously taxed global intangible low-taxed income apply to taxable years of foreign corporations beginning after date of enactment, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [19] Generally applies to distributions made after date of enactment, exception that modifications related to the determination of status as controlled foreign corporation apply to taxable years of foreign corporations beginning after the date of the enactment, and taxable years of United States persons in which or with which such taxable years of foreign corporations end.
- [20] Applies to taxable years of foreign corporations beginning after December 31, 2021, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [21] Applies to taxable years of foreign corporations ending after the date of enactment, and to taxable years of United States shareholders in which or with which such taxable years of foreign corporations end.
- [22] Applies to dividends paid (or amounts treated as dividends) after the date of enactment.
- [23] The amendments made by subsection (a) shall apply to distributions, transfers, and contributions made after December 31, 2021. The amendments made by subsection (b) shall apply to distributions, transfers, and contributions made in taxable years beginning after December 31, 2031.
- [24] Applicable for taxes with respect to which the 3-year period under section 6501(a) of the Internal Revenue Code of 1986 (without regard to the amendment made by this section) ends after December 31, 2021.
- [25] Repeal of Internal Revenue Code section 6751(b) is effective as if included in section 3306 of the Internal Revenue Service Restructuring and Reform Act of 1998. Quarterly certifications of compliance with procedural requirements apply to notices of penalty issued after date of enactment.
- [26] The temporary increase in the amount of tax on coal terminates for sales after December 31, 2025.
- [27] Sunsets 12/31/25 (section 181) and 12/31/26 (section 168(k)).
- [28] Effective for eligible indelibly dyed diesel fuel or kerosene removed on or after the date which is 180 days after the date of enactment.
- [29] The amendments made by this section shall apply to articles removed in calendar quarters beginning after the date which is 180 days after the date of enactment.

[30] E	stimate includes the	following budge	t effects:	2022	-	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>	<u>2030</u>	<u>2031</u>	2022-26	2022-31
	Total Revenue E	ffect		 			101	219	168	77	44	26	7		489	642
	On-budget effe	cts		 	•		107	227	171	77	44	26	7		505	659
	Off-budget effe	ects		 	-		-6	-8	-2						-17	-17

[31] Outlays arising from Medicare funding of residency positions are provided by the Congressional Budget Office.