

TAX CUTS AND JOBS ACT

An Insider's Look at the Law's
Drafting and Impact



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Tax Cuts and Jobs Act
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Agenda

- I. Overview of the Tax Cuts and Jobs Act
 - A. Budget Reconciliation and Revenue Estimate
 - B. Byrd rule in Senate
 - C. Distribution of the Tax Burden

- II. Corporate Tax Provisions
 - A. Rate Cut
 - B. Expensing

- III. Individual Tax Provisions
 - A. Lower rates
 - B. 199A -- 20% deduction for qualified business income
 - C. Increase of standard deduction and repeal of personal exemptions
 - D. Temporary expiring at the end of 2025

- IV. International Tax Provisions
 - A. FDII and GILTI
 - B. BEAT

- V. Estate Tax Provisions
 - A. Double the exemption amount
 - B. No repeal

ESTIMATED BUDGET EFFECTS OF THE CONFERENCE AGREEMENT FOR H.R. 1,
THE "TAX CUTS AND JOBS ACT"

Fiscal Years 2018 - 2027

[Billions of Dollars]

Provision	Effective	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	2018-22	2018-27
I. Individual Tax Reform													
A. Simplification and Reform of Rates, Standard Deductions, and Exemptions													
1. 10%, 12%, 22%, 24%, 32%, 35%, and 37% income tax rate brackets (sunset 12/31/25) [1][2].....	tyba 12/31/17	-94.1	-135.3	-140.9	-146.4	-152.0	-158.1	-164.3	-171.1	-52.0	[3]	-668.7	-1,214.2
2. Modify standard deduction (\$12,000 for singles; \$24,000 for married filing jointly; \$18,000 for HoH) (sunset 12/31/25) [2].....	tyba 12/31/17	-57.2	-82.6	-84.7	-87.5	-90.7	-92.9	-95.7	-99.1	-30.0	[3]	-402.6	-720.4
3. Repeal of deduction for personal exemptions (sunset 12/31/25) [2].....	tyba 12/31/17 generally	93.3	137.1	141.6	146.4	151.8	157.6	163.3	169.2	51.3	---	670.1	1,211.5
4. Alternative inflation measure [2].....	tyba 12/31/17	0.8	2.1	5.5	8.2	10.4	12.8	16.6	20.0	25.6	31.5	27.0	133.5
B. Treatment of Business Income of Individuals, Trusts, and Estates													
1. Allow 20 percent deduction of qualified business income and certain dividends for individuals and for gross income of agricultural or horticultural cooperatives (sunset 12/31/25) [4].....	tyba 12/31/17 generally	-27.7	-47.1	-49.9	-51.8	-52.8	-52.2	-53.6	-53.2	-24.2	-1.9	-229.5	-414.5
2. Disallow active passthrough losses in excess of \$500,000 for joint filers, \$250,000 for all others (sunset 12/31/25).....	tyba 12/31/17	9.5	16.2	17.2	18.0	18.8	19.6	20.4	19.4	9.3	1.3	79.7	149.7
C. Reform of the Child Tax Credit													
1. Modification of child tax credit: \$2,000 not indexed; refundable up to \$1,400 indexed down to nearest \$100 base year 2018; \$2,500 refundability threshold not indexed; \$500 other dependents not indexed; phase outs \$200K/\$400K not indexed (sunset 12/31/25) [2].....	tyba 12/31/17	-29.3	-67.7	-69.2	-70.4	-71.4	-73.8	-74.9	-76.0	-40.7	---	-308.1	-573.4
2. Require valid Social Security number of each child to claim refundable and non-refundable portions of child credit, non-child dependents and any child without a valid Social Security number still receives \$500 non-refundable credit (sunset 12/31/25) [2].....	tyba 12/31/17	---	3.9	3.8	3.8	3.7	3.8	3.7	3.7	3.0	0.5	15.2	29.8

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