

[Millions of Dollars]

[illegible]

Provision	Effective	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2025-29	2025-34
19. Extension of rollovers from qualified tuition programs to ABLE accounts permitted.....	tyba 12/31/25	---	[5]	-1	-1	-1	-1	-1	-2	-2	-2	-3	-11
20. Extension of treatment of certain individuals performing services in the Sinai Peninsula and enhancement to include additional areas.....	spo/a 1/1/26	---	-1	-1	-1	-1	-1	-1	-1	-1	-1	-4	-11
21. Extension of exclusion from gross income of student loans discharged on account of death or disability.....	doia 12/31/25	---	---	-44	-45	-46	-47	-49	-50	-51	-52	-136	-385
Part 2 - Additional Tax Relief for American Families and Workers													
1. No tax on tips (sunset 12/31/28).....	tyba 12/31/24	---	-12,247	-9,739	-10,546	-6,611	-90	-98	-107	-117	-127	-39,143	-39,681
2. No tax on overtime (sunset 12/31/28).....	tyba 12/31/24	---	-44,458	-35,546	-32,472	-11,541	---	---	---	---	---	-124,016	-124,016
3. Enhanced deduction for seniors (sunset 12/31/28) [1].....	tyba 12/31/24	-4,424	-17,660	-17,677	-18,123	-13,751	---	---	---	---	---	-71,635	-71,635
4. No tax on car loan interest (sunset 12/31/28).....	iia 12/31/24	-3,640	-10,167	-15,194	-18,670	-10,003	---	---	---	---	---	-57,673	-57,673
5. Enhancement of employer-provided child care credit.....	apoia 12/31/25	---	-45	-72	-76	-80	-84	-88	-93	-98	-94	-274	-731
6. Extension and enhancement of paid family and medical leave credit (45S) [9].....	tyba 12/31/25	---	-102	-260	-379	-489	-610	-737	-870	-972	-1,036	-1,229	-5,454
7. Enhancement of adoption tax credit [1].....	tyba 12/31/24	-189	-419	-301	-301	-183	-184	-185	-186	-187	-189	-1,393	-2,325
8. Recognizing Indian tribal governments for purposes of determining whether a child has special needs for purposes of the adoption credit [1].....	tyba 12/31/24	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	[5]	-1	-1
9. Tax credit for contributions of individuals to scholarship granting organizations (credit sunset 12/31/29).....	tyba 12/31/25	---	---	-4,987	-5,253	-4,991	-4,351	-566	-291	-1	-1	-15,232	-20,442
10. Additional elementary, secondary, and home school expenses treated as qualified higher education expenses for purposes of 529 accounts.....	dma DOE	---	-11	-13	-16	-16	-17	-17	-18	-18	-19	-56	-145
11. Certain postsecondary credentialing expenses treated as qualified higher education expenses for purposes of 529 accounts.....	dma DOE	----- Estimate Included in Item A.2.10. -----											
12. Reinstatement of partial deduction for charitable contributions of individuals who do not elect to itemize (sunset 12/31/28).....	tyba 12/31/24	-388	-1,876	-1,625	-1,684	-1,374	---	---	---	---	---	-6,947	-6,947
13. Exclusion for certain employer payments of student loans under educational assistance programs made permanent and adjusted for inflation.....	pma 12/31/25	---	-706	-1,034	-1,106	-1,182	-1,263	-1,349	-1,438	-1,531	-1,629	-4,027	-11,238
14. Extension of rules for treatment of certain disaster-related personal casualty losses.....	DOE	-6	-52	---	---	---	---	---	---	---	---	-60	-60
15. MAGA accounts	tyba 12/31/24	0	-7	-80	-183	-305	-441	-593	-762	-948	-1,153	-575	-4,473
16. MAGA accounts contribution pilot program [1].....	tyba 12/31/24	-644	-5,800	-3,218	-3,210	---	---	---	---	---	---	-12,872	-12,872
Part 3 - Investing in Health of American Families and Workers													
1. Treatment of health reimbursement arrangements integrated with individual market coverage.....	pyba 12/31/25	----- Estimate Included in Item A.3.3. Below -----											
2. Participants in CHOICE arrangement eligible for purchase of Exchange insurance under cafeteria plan.....	tyba 12/31/25	----- Estimate Included in Item A.3.3. Below -----											
3. Employer credit for CHOICE arrangement [15].....	tyba 12/31/25	---	-6	-10	-29	-44	-57	-74	-87	-93	-93	-88	-492
4. Individuals entitled to Part A of Medicare by reason of age allowed to contribute to health savings accounts [1][11][17].....	mba 12/31/25	---	-90	-239	-409	-523	-569	-598	-627	-649	-676	-1,260	-4,380
5. Treatment of direct primary care service arrangements [16]...	mba 12/31/25	---	-94	-177	-241	-311	-348	-372	-396	-423	-450	-823	-2,811

Provision	Effective	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2025-29	2025-34
6. Allowance of bronze and catastrophic plans in connection with health savings account [11].....	mba 12/31/25	---	-127	-286	-373	-431	-438	-451	-469	-490	-499	-1,217	-3,563
7. On-site employee clinics [23].....	mi tyba 12/31/25	---	-42	-108	-183	-270	-312	-331	-349	-368	-385	-603	-2,349
8. Certain amounts paid for physical activity, fitness, and exercise treated as amounts paid for medical care [20].....	tyba 12/31/25	---	-200	-523	-899	-1,206	-1,344	-1,443	-1,532	-1,633	-1,759	-2,828	-10,539
9. Allow both spouses to make catch-up contributions to the same health savings account [21].....	tyba 12/31/25	---	-67	-160	-197	-212	-225	-239	-251	-262	-267	-636	-1,880
10. FSA and HRA terminations or conversions to fund HSAs [18].....	dma 12/31/25	---	-22	-39	-42	-42	-43	-43	-44	-44	-45	-146	-363
11. Special rule for certain medical expenses incurred before establishment of health savings account [19].....	cba 12/31/25	---	-7	-21	-25	-24	-24	-24	-23	-22	-21	-77	-190
12. Contributions permitted if spouse has health flexible spending arrangement [22].....	pyba 12/31/25	---	-327	-593	-695	-740	-788	-843	-894	-946	-993	-2,354	-6,819
13. Increase in health savings account contribution limitation for certain individuals.....	tyba 12/31/25	---	-414	-775	-912	-949	-986	-1,032	-1,064	-1,107	-1,156	-3,050	-8,394
14. Interaction of healthcare tax provisions in Subtitle A3 [24]....	---	---	-27	-93	-166	-219	-234	-241	-250	-260	-269	-504	-1,759
Total of Subtitle A.....		-26,831	-373,300	-597,994	-622,348	-578,332	-532,667	-551,842	-574,521	-598,970	-626,539	-2,198,806	-5,083,350

SUBTITLE B - MAKE RURAL AMERICA AND MAIN STREET GROW AGAIN

Part 1- Extension of Tax Cuts and Jobs Act Reforms or Rural America and Main Street

1. Extension of special depreciation allowance for certain property (sunset 12/31/29).....	ppisa 1/19/25	-16,968	-82,787	-65,673	-57,842	-42,099	33,091	83,583	53,987	35,853	22,257	-265,369	-36,598
2. Deduction for domestic research and experimental expenditures (sunset 12/31/29).....	tyba 12/31/24	-28,938	-38,834	-29,801	-20,363	-10,559	28,573	39,475	26,372	12,739	-1,441	-128,495	-22,778
3. Modified calculation of adjusted taxable income for purposes of business interest deduction (sunset 12/31/29).....	tyba 12/31/24	-9,474	-6,455	-6,245	-5,813	-5,479	-3,100	-960	-805	-699	-522	-33,468	-39,554
4. Extension of deduction for foreign-derived intangible income and global intangible low-taxed income.....	tyba 12/31/25	---	-7,253	-14,477	-15,425	-18,124	-17,811	-16,053	-17,354	-18,342	-17,767	-55,278	-142,605
5. Extension of base erosion minimum tax amount.....	tyba 12/31/25	---	-1,991	-2,841	-2,043	-2,862	-3,647	-4,260	-4,552	-4,518	-4,527	-9,737	-31,241

Part 2 - Additional Tax Relief for Rural America and Main Street

[illegible]

Provision	Effective	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2025-29	2025-34
businesses.....	tyba 12/31/25	---	-3,366	-3,341	-1,603	-1,076	-1,012	-962	-1,026	-1,110	-1,153	-9,386	-14,646
11. Global intangible low-taxed income determined without regard to certain income derived from services performed in the Virgin Islands.....	tyba DOE	---	-42	-89	-96	-99	-103	-107	-111	-115	-119	-327	-883
12. Extension and modification of clean fuel production credit [10] (sunset 12/31/31).....	[27a]	---	-1,150	-2,296	-6,644	-7,943	-6,975	-8,460	-6,045	-3,154	-2,690	-18,033	-45,357
Part 3 - Investing in the Health of Rural American and Main Street													
1. Expanding the Definition of Rural Emergency Hospital Under the Medicare Program.....	---	----- Estimate to be Provided by the Congressional Budget Office -----											
Total of Subtitle B.....		-60,031	-178,444	-166,240	-155,254	-128,175	-781	73,618	37,792	16,523	20,969	-688,145	-540,022
SUBTITLE C - MAKE AMERICA WIN AGAIN													
Part 1 - Working Families over Elites													
1. Termination of previously-owned clean vehicle credit.....	vaa 12/31/25	---	121	434	542	862	1,136	1,297	1,592	1,460	---	1,959	7,444
2. Termination of clean vehicle credit.....	vaa 12/31/25	---	1,760	3,257	7,887	13,032	15,565	17,445	19,570	---	---	25,936	78,516
3. Termination of qualified commercial clean vehicles credit.....	vaa 12/31/25	---	7,156	10,263	12,363	14,755	17,250	18,846	20,894	3,651	-621	44,537	104,557
4. Termination of alternative fuel vehicle refueling property credit.....	ppisa 12/31/25	---	35	83	119	140	161	191	227	169	84	377	1,210
5. Termination of energy efficient home improvement credit.....	ppisa 12/31/25	---	258	2,598	2,735	2,880	3,032	3,192	3,360	3,167	---	8,471	21,222
6. Termination of residential clean energy credit.....	ppisa 12/31/25	-142	-753	5,486	7,942	9,321	10,135	10,853	11,526	11,943	11,048	21,855	77,361
7. Termination of new energy efficient home credit.....	haa 12/31/25	---	271	702	766	809	845	867	870	634	269	2,547	6,032
8. Phase out and restrictions on clean electricity production credit	[xa]	---	---	3	177	698	1,774	3,079	4,755	7,040	10,004	878	27,529
9. Phase out and restrictions on clean electricity investment credit.....	[xb]	---	347	9,561	14,434	16,187	18,190	20,207	22,989	25,016	27,951	40,529	154,881
10. Repeal of transferability of clean fuel production credit.....	fpa 12/31/27	----- Estimate Included in Item B.3.12. Above -----											
11. Restrictions on carbon oxide sequestration credit.....	[xc]	---	---	710	1,306	1,660	2,048	2,446	2,874	3,350	3,617	3,676	18,011
12. Phase out and restrictions on zero-emission nuclear power production credit.....	[xd]	---	---	---	---	739	1,834	2,811	3,665	1,383	---	739	10,432
13. Termination of clean hydrogen production credit [1][10].....	fbca 12/31/25	---	16	107	275	525	875	1,094	1,527	2,119	2,690	923	9,228
14. Phase-out and restrictions on advanced manufacturing production credit.....	[xe]	25	5,549	9,451	8,982	7,960	6,138	3,852	1,854	420	---	31,967	44,231
15. Phase-out of credit for certain energy property.....	[xf]	---	---	2	3	3	2	2	2	3	4	9	22
16. Income from hydrogen storage, carbon capture added to qualifying income of certain publicly traded partnerships treated as corporations.....	tyba 12/31/25	---	-195	-202	-210	-218	-226	-235	-244	-253	-263	-825	-2,046
17. Limitation on amortization of certain sports franchises.....	paa DOE	3	16	39	61	84	108	132	157	182	209	203	991
18. Limitation on individual deductions for certain State and local taxes.....		---	36,443	89,076	93,245	99,605	106,891	112,722	119,158	125,805	132,679	318,369	915,624

Provision	Effective	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2025-29	2025-34
19. Excessive employee remuneration from controlled group members and allocation of deduction.....	tyba 12/31/25	---	643	1,484	1,719	1,793	1,868	1,941	2,014	2,085	2,155	5,640	15,702
20. Expanding application of tax on excess compensation within tax-exempt organizations.....	tyba 12/31/25	---	236	334	362	393	426	462	501	543	589	1,324	3,844
21. Modification of the excise tax on net investment income of private colleges and universities	tyba 12/31/25	---	[25]	721	816	778	811	842	874	907	941	2,315	6,691
22. Modification of excise tax on investment income of certain private colleges and universities	tyba DOE	423	1,159	1,555	1,615	1,679	1,745	1,814	1,886	1,961	2,038	6,431	15,875
23. Certain purchases of employee-owned stock disregarded for purposes of foundation tax on excess business holdings	[26]	----- Negligible Revenue Effect -----											
24. Unrelated business taxable income increased by amount of certain fringe benefit expenses for which deduction is disallowed.....	apoa 12/31/25	---	205	279	287	296	305	314	323	333	343	1,067	2,685
25. Name and logo royalties treated as unrelated business taxable income.....	tyba 12/31/25	---	231	346	370	396	424	453	485	519	555	1,342	3,778
26. Exclusion of research income limited to publicly available research.....	aroad 12/31/25	----- Negligible Revenue Effect -----											
27. Limitation on excess business losses of noncorporate taxpayers.....	tyba 12/31/25	---	794	1,448	1,233	1,098	996	937	909	902	905	4,573	9,224
28. 1-percent floor on deductions of charitable corporations made by corporations.....	tyba 12/31/25	---	1,276	1,872	2,142	1,964	1,832	1,787	1,816	1,953	1,962	7,255	16,603
29. Enforcement of remedies against unfair foreign taxes.....	DOE		12,560	28,721	31,810	27,259	19,241	9,514	160	-4,828	-8,134	100,351	116,303
30. Reduction of excise tax on firearms silencers.....	cqbmt 90da DOE	-30	-84	-96	-111	-128	-147	-170	-195	-225	-259	-449	-1,444
31. Modifications to de minimis entry privilege for commercial shipments.....	transfers after DOE	----- Estimate to be Provided by the Congressional Budget Office -----											
32. Limitation on drawback of taxes paid with respect to substituted merchandise [a].....	cfooa 7/1/26	---	85	879	1,207	1,380	1,524	1,642	1,737	1,810	1,856	3,550	12,118
Part 2 - Removing Taxpayer Benefits for Illegal Immigrants													
1. Permitting premium tax credit only for certain individuals.....	tyba 12/31/26	----- Estimate Included in Item C.2.2. Below -----											
2. Certain aliens ineligible for premium tax credit [1][11].....	tyba 12/31/26	---	---	5,377	7,777	8,205	8,548	8,927	9,289	9,452	9,632	21,359	67,207
3. Disallowing premium tax credit during periods of Medicaid ineligibility due to alien status[1][11].....	tyba 12/31/25	---	3,318	4,762	5,177	5,444	5,641	5,935	6,247	6,460	6,719	18,701	49,703
4. Limiting Medicare coverage of certain individuals.....	---	----- Estimate to be Provided by the Congressional Budget Office -----											
5. Excise tax on remittance transfers.....	ra 12/31/25	---	1,078	2,074	2,377	2,485	2,597	2,711	2,828	2,950	3,075	8,014	22,175
6. Social security number requirement for American Opportunity and Lifetime Learning Credits [1].....	tyba 12/31/25	---	20	101	108	110	110	110	110	110	111	339	891
Part 3 - Preventing Fraud, Waste and Abuse													
1. Requiring Exchange verification of eligibility for health plans [1][11].....	tyba 12/31/27	---	---	---	3,924	5,711	5,769	5,992	6,238	6,614	7,080	9,635	41,328
2. Disallowing premium tax credit in case of certain coverage enrolled in during special enrollment period [1][11].....	[12]	---	1,884	3,402	4,678	5,118	4,986	4,966	5,028	5,378	5,594	15,082	41,034

Provision	Effective	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2025-29	2025-34
3. Eliminating limitation on recapture of advance payment of premium tax credit [1][13][11].....	tyba 12/31/25	---	38	2,222	2,188	2,360	2,404	2,477	2,552	2,594	2,711	6,808	19,547
Implementing artificial intelligence tools for purposes of.....													
4. Enforcement provisions with respect to COVID- related employee retention credits.....	---	----- Estimate to be Provided by the Congressional Budget Office -----											
5. Employee retention tax credit.....	DOE	945	3,854	1,417	79	---	---	---	---	---	---	6,294	6,294
6. Earned income tax credit reforms.....	[7]	---	4	565	495	2,581	2,268	2,317	2,315	2,336	2,350	3,645	15,230
7. Task force on the termination of direct file.....	DOE	----- Negligible Revenue Effect -----											
8. Termination of tax-exempt status of terrorist supporting organizations.....	[28]	----- Negligible Revenue Effect -----											
9. Increase in penalties for unauthorized disclosures of taxpayer information.....	Dma DOE	----- Negligible Revenue Effect -----											
10. Restriction on regulation of contingency fees with respect to tax returns, etc.....	DOE	----- Negligible Revenue Effect -----											
11. Interactions of health policies in Subtitle C [1][11][14].....	---	---	-158	-2,311	-4,088	-4,631	-4,814	-5,009	-5,240	-5,463	-5,620	-11,189	-37,336
Total of Subtitle C.....		1,224	78,168	186,722	214,793	233,333	242,292	246,763	254,653	222,480	222,273	714,236	1,902,697

**SUBTITLE D - INCREASE IN DEBT LIMIT -
MODIFICATION OF LIMITATION ON THE PUBLIC**

DEBT.....	-----	----- No Revenue Effect -----											
NET TOTAL		-85,638	-473,575	-577,512	-562,810	-473,173	-291,156	-231,462	-282,076	-359,967	-383,297	-2,172,715	-3,720,675

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be July 1, 2025.

Legend for "Effective" column:

apoa = amounts paid or incurred after
 aroaa = amounts received or accrued after
 Bpisa = buildings placed in service after
 Bpis tyba = buildings placed in service in taxable years beginning after
 cba = coverage beginning after
 Cba = construction beginning after
 cfoaa = claims filed on or after
 cma = contributions made after
 cqbmt = calendar quarters beginning more than
 Cya = calendar years after
 da = discharges after
 Da = distributions after
 dda = decedents dying after
 dma = distributions made after
 Dma = disclosures made after
 DOE = date of enactment

DOI = date of introduction
 doia = discharge of indebtedness after
 fbca = facilities beginning construction after
 fpa = fuel produced after
 gma = gifts made after
 haa = homes acquired after
 iae = inflations adjustment effective
 haa = homes acquired after
 ie = increase effective
 iia = indebtedness incurred after
 mba = months beginning after
 mi = months in
 miaef = modified inflation adjustment effective for
 paa = property acquired after
 pci = productions commencing in
 pma = payment made after

ppisa = property placed in service after
 pyba = plan years beginning after
 ra = remittances after
 spa = services performed after
 spo/a = service provided on or after
 tyba = taxable years beginning after
 tyea = taxable years ending after
 vaa = vehicles acquired after
 90da = 90 days after