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**Table T22-0161R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**  
**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>**  
**Summary Table**

| Expanded Cash Income<br>Level (thousands of 2022<br>dollars) <sup>2</sup> | Tax Units with Tax Increase or Cut <sup>3</sup> |                        |                   |                        | Percent Change<br>in After-Tax<br>Income <sup>4</sup> | Share of Total<br>Federal Tax<br>Change | Average<br>Federal Tax<br>Change (\$) | Average Federal Tax Rate <sup>5</sup> |                       |
|---|---|------------------------|-------------------|------------------------|---|---|---------------------------------------|---------------------------------------|-----------------------|
|   | With Tax Cut                                    |                        | With Tax Increase |                        |   |   |                                       | Change (%)<br>Points)                 | Under the<br>Proposal |
|   | Pct of Tax Units                                | Avg Tax Change<br>(\$) | Pct of Tax Units  | Avg Tax Change<br>(\$) |   |   |                                       |                                       |                       |
| Less than 10  | 44.3  | -600                   | 0.0               | 0                      | 4.6   | 4.5                                     | -270                                  | -4.4                                  | 0.4                   |
| 10-20   | 55.3  | -640                   | 0.0               | 0                      | 2.1   | 13.9                                    | -350                                  | -2.0                                  | 1.0                   |
| 20-30   | 74.6  | -330                   | 0.0               | 0                      | 0.9   | 10.0                                    | -250                                  | -0.9                                  | 3.4                   |
| 30-40   | 87.8  | -170                   | 0.0               | 0                      | 0.4   | 5.2                                     | -150                                  | -0.4                                  | 6.5                   |
| 40-50   | 93.9  | -120                   | 0.0               | 0                      | 0.2   | 3.3                                     | -110                                  | -0.2                                  | 9.2                   |
| 50-75   | 97.9  | -90                    | 0.0               | 0                      | 0.2   | 5.2                                     | -90                                   | -0.1                                  | 12.6                  |
| 75-100  | 99.0  | -110                   | 0.0               | 0                      | 0.1   | 4.3                                     | -110                                  | -0.1                                  | 15.1                  |
| 100-200   | 99.9  | -170                   | 0.0               | 0                      | 0.1   | 13.5                                    | -170                                  | -0.1                                  | 18.5                  |
| 200-500   | 100.0   | -390                   | 0.0               | 0                      | 0.2   | 17.7                                    | -390                                  | -0.1                                  | 23.1                  |
| 500-1,000   | 100.0   | -1,030                 | 0.0               | 0                      | 0.2   | 6.7                                     | -1,030                                | -0.1                                  | 28.0                  |
| More than 1,000   | 100.0   | -5,700                 | 0.0               | 0                      | 0.3   | 14.6                                    | -5,700                                | -0.2                                  | 32.3                  |
| All   | 88.5  | -290                   | 0.0               | 0                      | 0.2   | 100.0                                   | -250                                  | -0.2                                  | 21.0                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

Number of AMT Taxpayers (millions). Baseline: 7.7

Proposal: 7.7

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes both filing and non-filing units but excludes those that are dependents of other tax units. Tax units with negative adjusted gross income are excluded from their respective income class but are included in the totals. For a description of expanded cash income, see

<http://www.taxpolicycenter.org/TaxModel/income.cfm>

(3) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(4) After-tax income is expanded cash income less: individual income tax net of refundable credits; corporate income tax; payroll taxes (Social Security and Medicare); estate taxes; and excise taxes.

(5) Average federal tax (includes individual and corporate income tax, payroll taxes for Social Security and Medicare, the estate tax, and excise taxes) as a percentage of average expanded cash income.

**Table T22-0161R**  
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Baseline: Current Law

Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>

Detail Table

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Percent of Tax Units <sup>3</sup> |                   | Percent Change in After-Tax Income <sup>4</sup> | Share of Total Federal Tax Change | Average Federal Tax Change |                      | Share of Federal Taxes |                    | Average Federal Tax Rate <sup>6</sup> |                    |
|---|-----------------------------------|-------------------|---|-----------------------------------|----------------------------|----------------------|------------------------|--------------------|---------------------------------------|--------------------|
|   | With Tax cut                      | With Tax Increase |   |                                   | Dollars                    | Percent <sup>5</sup> | Change (% Points)      | Under the Proposal | Change (% Points)                     | Under the Proposal |
| Less than 10  | 44.3                              | 0.0               | 4.6   | 4.5                               | -270                       | -92.6                | 0.0                    | 0.0                | -4.4                                  | 0.4                |
| 10-20   | 55.3                              | 0.0               | 2.1   | 13.9                              | -350                       | -66.2                | -0.1                   | 0.1                | -2.0                                  | 1.0                |
| 20-30   | 74.6                              | 0.0               | 0.9   | 10.0                              | -250                       | -20.5                | -0.1                   | 0.4                | -0.9                                  | 3.4                |
| 30-40   | 87.8                              | 0.0               | 0.4   | 5.2                               | -150                       | -5.6                 | 0.0                    | 0.8                | -0.4                                  | 6.5                |
| 40-50   | 93.9                              | 0.0               | 0.2   | 3.3                               | -110                       | -2.3                 | 0.0                    | 1.2                | -0.2                                  | 9.2                |
| 50-75   | 97.9                              | 0.0               | 0.2   | 5.2                               | -90                        | -1.0                 | 0.0                    | 4.4                | -0.1                                  | 12.6               |
| 75-100  | 99.0                              | 0.0               | 0.1   | 4.3                               | -110                       | -0.7                 | 0.0                    | 5.5                | -0.1                                  | 15.1               |
| 100-200   | 99.9                              | 0.0               | 0.1   | 13.5                              | -170                       | -0.6                 | 0.1                    | 20.8               | -0.1                                  | 18.5               |
| 200-500   | 100.0                             | 0.0               | 0.2   | 17.7                              | -390                       | -0.5                 | 0.1                    | 30.6               | -0.1                                  | 23.1               |
| 500-1,000   | 100.0                             | 0.0               | 0.2   | 6.7                               | -1,030                     | -0.5                 | 0.1                    | 12.2               | -0.1                                  | 28.0               |
| More than 1,000   | 100.0                             | 0.0               | 0.3   | 14.6                              | -5,700                     | -0.5                 | 0.1                    | 23.8               | -0.2                                  | 32.3               |
| All   | 88.5                              | 0.0               | 0.2   | 100.0                             | -250                       | -0.9                 | 0.0                    | 100.0              | -0.2                                  | 21.0               |

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Level, 2027 <sup>1</sup>**

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Tax Units          |                  | Pre-Tax Income    |                  | Federal Tax Burden |                  | After-Tax Income <sup>4</sup> |                  | Average Federal Tax Rate <sup>6</sup> |
|---|--------------------|------------------|-------------------|------------------|--------------------|------------------|-------------------------------|------------------|---------------------------------------|
|   | Number (thousands) | Percent of Total | Average (dollars) | Percent of Total | Average (dollars)  | Percent of Total | Average (dollars)             | Percent of Total |                                       |
| Less than 10  | 7,930              | 4.2              | 6,090             | 0.2              | 290                | 0.0              | 5,800                         | 0.2              | 4.8                                   |
| 10-20   | 18,550             | 9.9              | 17,310            | 1.3              | 530                | 0.2              | 16,780                        | 1.6              | 3.1                                   |
| 20-30   | 18,950             | 10.1             | 28,170            | 2.1              | 1,220              | 0.4              | 26,950                        | 2.6              | 4.3                                   |
| 30-40   | 16,290             | 8.7              | 39,460            | 2.5              | 2,710              | 0.8              | 36,760                        | 3.0              | 6.9                                   |
| 40-50   | 14,060             | 7.5              | 50,810            | 2.8              | 4,760              | 1.3              | 46,050                        | 3.3              | 9.4                                   |
| 50-75   | 26,490             | 14.2             | 69,830            | 7.3              | 8,920              | 4.4              | 60,910                        | 8.1              | 12.8                                  |
| 75-100  | 19,570             | 10.5             | 98,250            | 7.6              | 14,950             | 5.5              | 83,300                        | 8.2              | 15.2                                  |
| 100-200   | 37,590             | 20.1             | 159,240           | 23.7             | 29,580             | 20.8             | 129,660                       | 24.5             | 18.6                                  |
| 200-500   | 21,550             | 11.5             | 326,050           | 27.8             | 75,640             | 30.4             | 250,420                       | 27.1             | 23.2                                  |
| 500-1,000   | 3,090              | 1.7              | 748,330           | 9.1              | 210,810            | 12.2             | 537,520                       | 8.3              | 28.2                                  |
| More than 1,000   | 1,210              | 0.7              | 3,217,300         | 15.5             | 1,045,310          | 23.7             | 2,171,990                     | 13.2             | 32.5                                  |
| All   | 186,800            | 100.0            | 135,260           | 100.0            | 28,660             | 100.0            | 106,600                       | 100.0            | 21.2                                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

Number of AMT Taxpayers (millions). Baseline: 7.7

Proposal: 7.7

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes both filing and non-filing units but excludes those that are dependents of other tax units. Tax units with negative adjusted gross income are excluded from their respective income class but are included in the totals. For a description of expanded cash income, see

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(3) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(4) After-tax income is expanded cash income less: individual income tax net of refundable credits; corporate income tax; payroll taxes (Social Security and Medicare); estate tax; and excise taxes.

(5) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(6) Average federal tax (includes individual and corporate income tax, payroll taxes for Social Security and Medicare, the estate tax, and excise taxes) as a percentage of average expanded cash income.

**Table T22-0161R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**

Baseline: Current Law

Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>

Detail Table - Single Tax Units

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Percent of Tax Units <sup>3</sup> |                   | Percent Change in After-Tax Income <sup>4</sup> | Share of Total Federal Tax Change | Average Federal Tax Change |                      | Share of Federal Taxes |                    | Average Federal Tax Rate <sup>6</sup> |                    |
|---|-----------------------------------|-------------------|---|-----------------------------------|----------------------------|----------------------|------------------------|--------------------|---------------------------------------|--------------------|
|   | With Tax cut                      | With Tax Increase |   |                                   | Dollars                    | Percent <sup>5</sup> | Change (% Points)      | Under the Proposal | Change (% Points)                     | Under the Proposal |
| Less than 10  | 44.8                              | 0.0               | 4.5   | 8.4                               | -250                       | -63.1                | -0.1                   | 0.1                | -4.2                                  | 2.4                |
| 10-20   | 51.8                              | 0.0               | 2.2   | 26.6                              | -350                       | -42.4                | -0.4                   | 0.5                | -2.1                                  | 2.8                |
| 20-30   | 73.7                              | 0.0               | 1.0   | 17.5                              | -260                       | -13.5                | -0.2                   | 1.7                | -0.9                                  | 6.0                |
| 30-40   | 91.0                              | 0.0               | 0.5   | 8.1                               | -160                       | -4.2                 | -0.1                   | 2.7                | -0.4                                  | 9.4                |
| 40-50   | 96.9                              | 0.0               | 0.2   | 4.3                               | -100                       | -1.8                 | 0.0                    | 3.6                | -0.2                                  | 11.4               |
| 50-75   | 98.5                              | 0.0               | 0.1   | 6.1                               | -80                        | -0.8                 | 0.1                    | 11.7               | -0.1                                  | 14.9               |
| 75-100  | 99.3                              | 0.0               | 0.1   | 4.9                               | -100                       | -0.6                 | 0.1                    | 12.4               | -0.1                                  | 18.0               |
| 100-200   | 99.9                              | 0.0               | 0.2   | 10.0                              | -170                       | -0.5                 | 0.3                    | 29.3               | -0.1                                  | 22.2               |
| 200-500   | 100.0                             | 0.0               | 0.2   | 6.5                               | -420                       | -0.5                 | 0.2                    | 19.1               | -0.1                                  | 25.9               |
| 500-1,000   | 100.0                             | 0.0               | 0.2   | 1.9                               | -1,120                     | -0.5                 | 0.1                    | 5.8                | -0.2                                  | 30.1               |
| More than 1,000   | 99.7                              | 0.0               | 0.3   | 4.7                               | -6,480                     | -0.6                 | 0.1                    | 12.7               | -0.2                                  | 34.8               |
| All   | 82.8                              | 0.0               | 0.4   | 100.0                             | -210                       | -1.5                 | 0.0                    | 100.0              | -0.3                                  | 19.2               |

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Level, 2027 <sup>1</sup>**

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Tax Units          |                  | Pre-Tax Income    |                  | Federal Tax Burden |                  | After-Tax Income <sup>4</sup> |                  | Average Federal Tax Rate <sup>6</sup> |
|---|--------------------|------------------|-------------------|------------------|--------------------|------------------|-------------------------------|------------------|---------------------------------------|
|   | Number (thousands) | Percent of Total | Average (dollars) | Percent of Total | Average (dollars)  | Percent of Total | Average (dollars)             | Percent of Total |                                       |
| Less than 10  | 6,520              | 7.0              | 6,070             | 0.6              | 400                | 0.2              | 5,670                         | 0.7              | 6.6                                   |
| 10-20   | 14,890             | 16.1             | 17,220            | 3.7              | 830                | 0.9              | 16,390                        | 4.4              | 4.8                                   |
| 20-30   | 13,120             | 14.1             | 27,960            | 5.3              | 1,950              | 1.9              | 26,010                        | 6.2              | 7.0                                   |
| 30-40   | 9,780              | 10.5             | 39,450            | 5.6              | 3,860              | 2.8              | 35,600                        | 6.3              | 9.8                                   |
| 40-50   | 8,170              | 8.8              | 50,820            | 6.0              | 5,890              | 3.6              | 44,930                        | 6.6              | 11.6                                  |
| 50-75   | 14,950             | 16.1             | 69,680            | 15.1             | 10,440             | 11.6             | 59,230                        | 16.0             | 15.0                                  |
| 75-100  | 9,360              | 10.1             | 97,490            | 13.2             | 17,660             | 12.3             | 79,830                        | 13.5             | 18.1                                  |
| 100-200   | 11,560             | 12.5             | 151,200           | 25.4             | 33,700             | 29.1             | 117,490                       | 24.5             | 22.3                                  |
| 200-500   | 3,060              | 3.3              | 317,560           | 14.1             | 82,790             | 18.9             | 234,760                       | 13.0             | 26.1                                  |
| 500-1,000   | 340                | 0.4              | 748,320           | 3.7              | 226,460            | 5.8              | 521,860                       | 3.2              | 30.3                                  |
| More than 1,000   | 140                | 0.2              | 3,351,230         | 7.0              | 1,173,540          | 12.6             | 2,177,690                     | 5.6              | 35.0                                  |
| All   | 92,760             | 100.0            | 74,280            | 100.0            | 14,450             | 100.0            | 59,830                        | 100.0            | 19.5                                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

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Baseline: Current Law

Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>

Detail Table - Married Tax Units Filing Jointly

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Percent of Tax Units <sup>3</sup> |                   | Percent Change in After-Tax Income <sup>4</sup> | Share of Total Federal Tax Change | Average Federal Tax Change |                      | Share of Federal Taxes |                    | Average Federal Tax Rate <sup>6</sup> |                    |
|---|-----------------------------------|-------------------|---|-----------------------------------|----------------------------|----------------------|------------------------|--------------------|---------------------------------------|--------------------|
|   | With Tax cut                      | With Tax Increase |   |                                   | Dollars                    | Percent <sup>5</sup> | Change (% Points)      | Under the Proposal | Change (% Points)                     | Under the Proposal |
| Less than 10  | 31.0                              | 0.0               | 5.3   | 0.9                               | -270                       | -230.8               | 0.0                    | 0.0                | -5.2                                  | -3.0               |
| 10-20   | 49.3                              | 0.0               | 2.5   | 2.8                               | -420                       | -84.7                | 0.0                    | 0.0                | -2.4                                  | 0.4                |
| 20-30   | 51.8                              | 0.0               | 1.1   | 3.5                               | -320                       | -47.3                | 0.0                    | 0.0                | -1.1                                  | 1.2                |
| 30-40   | 64.0                              | 0.0               | 0.5   | 2.6                               | -200                       | -20.9                | 0.0                    | 0.1                | -0.5                                  | 1.9                |
| 40-50   | 78.5                              | 0.0               | 0.4   | 2.1                               | -180                       | -8.9                 | 0.0                    | 0.1                | -0.4                                  | 3.6                |
| 50-75   | 94.7                              | 0.0               | 0.2   | 3.6                               | -140                       | -2.6                 | 0.0                    | 0.9                | -0.2                                  | 7.5                |
| 75-100  | 98.0                              | 0.0               | 0.1   | 3.1                               | -110                       | -1.0                 | 0.0                    | 2.0                | -0.1                                  | 10.9               |
| 100-200   | 100.0                             | 0.0               | 0.1   | 15.7                              | -170                       | -0.6                 | 0.0                    | 16.0               | -0.1                                  | 16.3               |
| 200-500   | 100.0                             | 0.0               | 0.2   | 29.0                              | -380                       | -0.5                 | 0.1                    | 36.4               | -0.1                                  | 22.5               |
| 500-1,000   | 100.0                             | 0.0               | 0.2   | 11.7                              | -1,010                     | -0.5                 | 0.0                    | 15.6               | -0.1                                  | 27.8               |
| More than 1,000   | 100.0                             | 0.0               | 0.3   | 23.7                              | -5,370                     | -0.5                 | 0.0                    | 28.6               | -0.2                                  | 32.0               |
| All   | 92.8                              | 0.0               | 0.2   | 100.0                             | -350                       | -0.7                 | 0.0                    | 100.0              | -0.2                                  | 22.5               |

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Level, 2027 <sup>1</sup>**

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Tax Units          |                  | Pre-Tax Income    |                  | Federal Tax Burden |                  | After-Tax Income <sup>4</sup> |                  | Average Federal Tax Rate <sup>6</sup> |
|---|--------------------|------------------|-------------------|------------------|--------------------|------------------|-------------------------------|------------------|---------------------------------------|
|   | Number (thousands) | Percent of Total | Average (dollars) | Percent of Total | Average (dollars)  | Percent of Total | Average (dollars)             | Percent of Total |                                       |
| Less than 10  | 760                | 1.2              | 5,200             | 0.0              | 120                | 0.0              | 5,090                         | 0.0              | 2.3                                   |
| 10-20   | 1,540              | 2.4              | 17,350            | 0.2              | 500                | 0.0              | 16,850                        | 0.2              | 2.9                                   |
| 20-30   | 2,570              | 3.9              | 28,780            | 0.5              | 670                | 0.1              | 28,110                        | 0.6              | 2.3                                   |
| 30-40   | 2,950              | 4.5              | 39,560            | 0.7              | 970                | 0.1              | 38,590                        | 0.9              | 2.4                                   |
| 40-50   | 2,720              | 4.2              | 50,810            | 0.9              | 2,020              | 0.2              | 48,790                        | 1.1              | 4.0                                   |
| 50-75   | 5,970              | 9.1              | 70,320            | 2.7              | 5,380              | 0.9              | 64,940                        | 3.2              | 7.7                                   |
| 75-100  | 6,400              | 9.8              | 99,300            | 4.1              | 10,930             | 2.0              | 88,370                        | 4.7              | 11.0                                  |
| 100-200   | 20,940             | 32.1             | 165,210           | 22.0             | 27,160             | 16.0             | 138,050                       | 23.8             | 16.4                                  |
| 200-500   | 17,350             | 26.6             | 328,740           | 36.3             | 74,330             | 36.4             | 254,410                       | 36.3             | 22.6                                  |
| 500-1,000   | 2,650              | 4.1              | 748,220           | 12.6             | 208,640            | 15.6             | 539,580                       | 11.8             | 27.9                                  |
| More than 1,000   | 1,020              | 1.6              | 3,101,410         | 20.0             | 998,650            | 28.6             | 2,102,760                     | 17.6             | 32.2                                  |
| All   | 65,350             | 100.0            | 240,210           | 100.0            | 54,300             | 100.0            | 185,910                       | 100.0            | 22.6                                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes both filing and non-filing units but excludes those that are dependents of other tax units. Tax units with negative adjusted gross income are excluded from their respective income class but are included in the totals. For a description of expanded cash income, see

<http://www.taxpolicycenter.org/TaxModel/income.cfm>

(3) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(4) After-tax income is expanded cash income less: individual income tax net of refundable credits; corporate income tax; payroll taxes (Social Security and Medicare); estate tax; and excise taxes.

(5) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(6) Average federal tax (includes individual and corporate income tax, payroll taxes for Social Security and Medicare, the estate tax, and excise taxes) as a percentage of average expanded cash income.

**Table T22-0161R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**

Baseline: Current Law

Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>

Detail Table - Head of Household Tax Units

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Percent of Tax Units <sup>3</sup> |                   | Percent Change in After-Tax Income <sup>4</sup> | Share of Total Federal Tax Change | Average Federal Tax Change |                      | Share of Federal Taxes |                    | Average Federal Tax Rate <sup>6</sup> |                    |
|---|-----------------------------------|-------------------|---|-----------------------------------|----------------------------|----------------------|------------------------|--------------------|---------------------------------------|--------------------|
|   | With Tax cut                      | With Tax Increase |   |                                   | Dollars                    | Percent <sup>5</sup> | Change (% Points)      | Under the Proposal | Change (% Points)                     | Under the Proposal |
| Less than 10  | 67.1                              | 0.0               | 6.2   | 7.4                               | -530                       | 50.4                 | -0.1                   | -0.3               | -7.1                                  | -21.2              |
| 10-20   | 86.9                              | 0.0               | 1.7   | 18.0                              | -340                       | 17.1                 | -0.2                   | -1.5               | -1.9                                  | -13.1              |
| 20-30   | 96.8                              | 0.0               | 0.5   | 12.1                              | -150                       | 7.8                  | -0.2                   | -2.0               | -0.5                                  | -7.2               |
| 30-40   | 99.3                              | 0.0               | 0.2   | 7.5                               | -90                        | -27.9                | -0.1                   | 0.2                | -0.2                                  | 0.6                |
| 40-50   | 99.9                              | 0.0               | 0.1   | 5.0                               | -70                        | -2.0                 | 0.0                    | 3.0                | -0.1                                  | 6.7                |
| 50-75   | 99.8                              | 0.0               | 0.1   | 9.7                               | -70                        | -0.9                 | 0.0                    | 12.5               | -0.1                                  | 11.2               |
| 75-100  | 100.0                             | 0.0               | 0.1   | 8.2                               | -100                       | -0.7                 | 0.1                    | 14.5               | -0.1                                  | 14.1               |
| 100-200   | 99.8                              | 0.0               | 0.1   | 17.3                              | -150                       | -0.5                 | 0.3                    | 39.4               | -0.1                                  | 18.8               |
| 200-500   | 99.9                              | 0.0               | 0.2   | 7.6                               | -340                       | -0.5                 | 0.1                    | 19.3               | -0.1                                  | 23.5               |
| 500-1,000   | 100.0                             | 0.0               | 0.2   | 1.3                               | -920                       | -0.4                 | 0.0                    | 3.8                | -0.1                                  | 28.6               |
| More than 1,000   | 99.8                              | 0.0               | 0.3   | 5.1                               | -7,580                     | -0.6                 | 0.1                    | 11.1               | -0.2                                  | 31.5               |
| All   | 97.7                              | 0.0               | 0.2   | 100.0                             | -150                       | -1.2                 | 0.0                    | 100.0              | -0.2                                  | 14.6               |

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Level, 2027 <sup>1</sup>**

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Tax Units          |                  | Pre-Tax Income    |                  | Federal Tax Burden |                  | After-Tax Income <sup>4</sup> |                  | Average Federal Tax Rate <sup>6</sup> |
|---|--------------------|------------------|-------------------|------------------|--------------------|------------------|-------------------------------|------------------|---------------------------------------|
|   | Number (thousands) | Percent of Total | Average (dollars) | Percent of Total | Average (dollars)  | Percent of Total | Average (dollars)             | Percent of Total |                                       |
| Less than 10  | 500                | 2.1              | 7,440             | 0.2              | -1,050             | -0.2             | 8,490                         | 0.3              | -14.1                                 |
| 10-20   | 1,870              | 7.9              | 17,890            | 1.7              | -2,010             | -1.3             | 19,890                        | 2.2              | -11.2                                 |
| 20-30   | 2,900              | 12.2             | 28,510            | 4.1              | -1,900             | -1.9             | 30,410                        | 5.2              | -6.7                                  |
| 30-40   | 3,130              | 13.2             | 39,400            | 6.2              | 310                | 0.3              | 39,100                        | 7.2              | 0.8                                   |
| 40-50   | 2,620              | 11.1             | 50,750            | 6.7              | 3,460              | 3.1              | 47,290                        | 7.3              | 6.8                                   |
| 50-75   | 4,680              | 19.8             | 69,560            | 16.3             | 7,860              | 12.4             | 61,700                        | 17.0             | 11.3                                  |
| 75-100  | 3,060              | 12.9             | 98,020            | 15.0             | 13,910             | 14.4             | 84,100                        | 15.1             | 14.2                                  |
| 100-200   | 4,020              | 17.0             | 152,640           | 30.7             | 28,780             | 39.1             | 123,860                       | 29.3             | 18.9                                  |
| 200-500   | 790                | 3.3              | 302,170           | 12.0             | 71,410             | 19.1             | 230,760                       | 10.7             | 23.6                                  |
| 500-1,000   | 50                 | 0.2              | 752,840           | 2.0              | 216,430            | 3.8              | 536,410                       | 1.6              | 28.8                                  |
| More than 1,000   | 20                 | 0.1              | 4,334,860         | 5.2              | 1,372,630          | 11.1             | 2,962,230                     | 4.2              | 31.7                                  |
| All   | 23,690             | 100.0            | 84,320            | 100.0            | 12,490             | 100.0            | 71,830                        | 100.0            | 14.8                                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes both filing and non-filing units but excludes those that are dependents of other tax units. Tax units with negative adjusted gross income are excluded from their respective income class but are included in the totals. For a description of expanded cash income, see

<http://www.taxpolicycenter.org/TaxModel/income.cfm>

(3) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(4) After-tax income is expanded cash income less: individual income tax net of refundable credits; corporate income tax; payroll taxes (Social Security and Medicare); estate tax; and excise taxes.

(5) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(6) Average federal tax (includes individual and corporate income tax, payroll taxes for Social Security and Medicare, the estate tax, and excise taxes) as a percentage of average expanded cash income.

**Table T22-0161R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**

Baseline: Current Law

Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>

Detail Table - Tax Units with Children

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Percent of Tax Units <sup>3</sup> |                   | Percent Change in After-Tax Income <sup>4</sup> | Share of Total Federal Tax Change | Average Federal Tax Change |                      | Share of Federal Taxes |                    | Average Federal Tax Rate <sup>6</sup> |                    |
|---|-----------------------------------|-------------------|---|-----------------------------------|----------------------------|----------------------|------------------------|--------------------|---------------------------------------|--------------------|
|   | With Tax cut                      | With Tax Increase |   |                                   | Dollars                    | Percent <sup>5</sup> | Change (% Points)      | Under the Proposal | Change (% Points)                     | Under the Proposal |
| Less than 10  | 74.5                              | 0.0               | 8.0   | 3.6                               | -690                       | 61.9                 | 0.0                    | -0.1               | -9.2                                  | -24.1              |
| 10-20   | 91.2                              | 0.0               | 1.8   | 6.5                               | -360                       | 16.9                 | -0.1                   | -0.3               | -2.0                                  | -14.1              |
| 20-30   | 97.8                              | 0.0               | 0.7   | 5.9                               | -210                       | 12.1                 | 0.0                    | -0.4               | -0.7                                  | -6.9               |
| 30-40   | 99.4                              | 0.0               | 0.4   | 4.1                               | -140                       | -44.1                | 0.0                    | 0.0                | -0.4                                  | 0.4                |
| 40-50   | 99.8                              | 0.0               | 0.2   | 2.6                               | -110                       | -3.3                 | 0.0                    | 0.5                | -0.2                                  | 6.1                |
| 50-75   | 99.8                              | 0.0               | 0.2   | 4.2                               | -90                        | -1.2                 | 0.0                    | 2.2                | -0.1                                  | 10.7               |
| 75-100  | 99.9                              | 0.0               | 0.1   | 3.4                               | -110                       | -0.8                 | 0.0                    | 2.9                | -0.1                                  | 13.5               |
| 100-200   | 99.9                              | 0.0               | 0.1   | 13.5                              | -160                       | -0.6                 | 0.0                    | 16.6               | -0.1                                  | 18.1               |
| 200-500   | 100.0                             | 0.0               | 0.1   | 24.0                              | -360                       | -0.5                 | 0.1                    | 34.6               | -0.1                                  | 23.3               |
| 500-1,000   | 100.0                             | 0.0               | 0.2   | 10.1                              | -940                       | -0.4                 | 0.0                    | 15.4               | -0.1                                  | 28.4               |
| More than 1,000   | 100.0                             | 0.0               | 0.2   | 21.2                              | -5,090                     | -0.5                 | 0.1                    | 28.3               | -0.2                                  | 32.4               |
| All   | 98.9                              | 0.0               | 0.2   | 100.0                             | -290                       | -0.7                 | 0.0                    | 100.0              | -0.2                                  | 22.4               |

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Level, 2027 <sup>1</sup>**

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Tax Units          |                  | Pre-Tax Income    |                  | Federal Tax Burden |                  | After-Tax Income <sup>4</sup> |                  | Average Federal Tax Rate <sup>6</sup> |
|---|--------------------|------------------|-------------------|------------------|--------------------|------------------|-------------------------------|------------------|---------------------------------------|
|   | Number (thousands) | Percent of Total | Average (dollars) | Percent of Total | Average (dollars)  | Percent of Total | Average (dollars)             | Percent of Total |                                       |
| Less than 10  | 760                | 1.5              | 7,540             | 0.1              | -1,120             | 0.0              | 8,660                         | 0.1              | -14.9                                 |
| 10-20   | 2,690              | 5.2              | 17,750            | 0.5              | -2,140             | -0.3             | 19,890                        | 0.7              | -12.1                                 |
| 20-30   | 4,140              | 8.0              | 28,590            | 1.2              | -1,750             | -0.3             | 30,340                        | 1.6              | -6.1                                  |
| 30-40   | 4,370              | 8.5              | 39,560            | 1.8              | 320                | 0.1              | 39,250                        | 2.3              | 0.8                                   |
| 40-50   | 3,630              | 7.0              | 50,680            | 1.9              | 3,210              | 0.5              | 47,470                        | 2.3              | 6.3                                   |
| 50-75   | 6,600              | 12.8             | 69,920            | 4.7              | 7,590              | 2.3              | 62,330                        | 5.4              | 10.9                                  |
| 75-100  | 4,810              | 9.3              | 98,430            | 4.8              | 13,430             | 2.9              | 85,000                        | 5.4              | 13.7                                  |
| 100-200   | 12,350             | 23.9             | 163,750           | 20.5             | 29,780             | 16.6             | 133,970                       | 21.7             | 18.2                                  |
| 200-500   | 9,920              | 19.2             | 329,020           | 33.1             | 77,170             | 34.5             | 251,860                       | 32.7             | 23.5                                  |
| 500-1,000   | 1,600              | 3.1              | 749,410           | 12.1             | 213,710            | 15.4             | 535,710                       | 11.2             | 28.5                                  |
| More than 1,000   | 630                | 1.2              | 3,079,370         | 19.5             | 1,002,910          | 28.2             | 2,076,460                     | 17.0             | 32.6                                  |
| All   | 51,730             | 100.0            | 190,630           | 100.0            | 42,910             | 100.0            | 147,710                       | 100.0            | 22.5                                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

Note: Tax units with children are those claiming an exemption for children at home or away from home or with children qualifying for the Child Tax Credit or EITC.

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

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(3) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(4) After-tax income is expanded cash income less: individual income tax net of refundable credits; corporate income tax; payroll taxes (Social Security and Medicare); estate tax; and excise taxes.

(5) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

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**Table T22-0161R**  
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**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**

Baseline: Current Law

Distribution of Federal Tax Change by Expanded Cash Income Level, 2027 <sup>1</sup>

Detail Table - Elderly Tax Units

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Percent of Tax Units <sup>3</sup> |                   | Percent Change in After-Tax Income <sup>4</sup> | Share of Total Federal Tax Change | Average Federal Tax Change |                      | Share of Federal Taxes |                    | Average Federal Tax Rate <sup>6</sup> |                    |
|---|-----------------------------------|-------------------|---|-----------------------------------|----------------------------|----------------------|------------------------|--------------------|---------------------------------------|--------------------|
|   | With Tax cut                      | With Tax Increase |   |                                   | Dollars                    | Percent <sup>5</sup> | Change (% Points)      | Under the Proposal | Change (% Points)                     | Under the Proposal |
| Less than 10  | 17.0                              | 0.0               | 1.3   | 0.8                               | -70                        | -67.0                | 0.0                    | 0.0                | -1.3                                  | 0.6                |
| 10-20   | 16.3                              | 0.0               | 0.3   | 3.2                               | -60                        | -30.7                | 0.0                    | 0.1                | -0.3                                  | 0.8                |
| 20-30   | 43.2                              | 0.0               | 0.4   | 6.0                               | -100                       | -18.0                | -0.1                   | 0.3                | -0.4                                  | 1.7                |
| 30-40   | 72.2                              | 0.0               | 0.4   | 7.3                               | -140                       | -12.4                | -0.1                   | 0.5                | -0.4                                  | 2.5                |
| 40-50   | 86.4                              | 0.0               | 0.3   | 5.6                               | -120                       | -5.4                 | -0.1                   | 1.0                | -0.2                                  | 4.2                |
| 50-75   | 95.7                              | 0.0               | 0.2   | 8.5                               | -110                       | -2.3                 | -0.1                   | 3.8                | -0.2                                  | 6.7                |
| 75-100  | 97.4                              | 0.0               | 0.1   | 6.4                               | -120                       | -1.2                 | 0.0                    | 5.4                | -0.1                                  | 9.5                |
| 100-200   | 100.0                             | 0.0               | 0.1   | 17.8                              | -190                       | -0.9                 | 0.0                    | 21.5               | -0.1                                  | 14.0               |
| 200-500   | 100.0                             | 0.0               | 0.2   | 17.6                              | -490                       | -0.7                 | 0.1                    | 24.7               | -0.2                                  | 20.2               |
| 500-1,000   | 100.0                             | 0.0               | 0.2   | 6.5                               | -1,260                     | -0.6                 | 0.0                    | 10.8               | -0.2                                  | 26.6               |
| More than 1,000   | 100.0                             | 0.0               | 0.3   | 18.7                              | -7,380                     | -0.6                 | 0.1                    | 31.2               | -0.2                                  | 32.3               |
| All   | 77.3                              | 0.0               | 0.2   | 100.0                             | -200                       | -1.0                 | 0.0                    | 100.0              | -0.2                                  | 16.7               |

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Level, 2027 <sup>1</sup>**

| Expanded Cash Income Level (thousands of 2022 dollars) <sup>2</sup> | Tax Units          |                  | Pre-Tax Income    |                  | Federal Tax Burden |                  | After-Tax Income <sup>4</sup> |                  | Average Federal Tax Rate <sup>6</sup> |
|---|--------------------|------------------|-------------------|------------------|--------------------|------------------|-------------------------------|------------------|---------------------------------------|
|   | Number (thousands) | Percent of Total | Average (dollars) | Percent of Total | Average (dollars)  | Percent of Total | Average (dollars)             | Percent of Total |                                       |
| Less than 10  | 1,180              | 2.2              | 5,900             | 0.1              | 110                | 0.0              | 5,790                         | 0.1              | 1.9                                   |
| 10-20   | 5,510              | 10.5             | 18,020            | 1.6              | 200                | 0.1              | 17,820                        | 1.9              | 1.1                                   |
| 20-30   | 6,170              | 11.7             | 28,000            | 2.8              | 570                | 0.3              | 27,430                        | 3.4              | 2.0                                   |
| 30-40   | 5,450              | 10.4             | 39,630            | 3.6              | 1,140              | 0.6              | 38,480                        | 4.2              | 2.9                                   |
| 40-50   | 4,880              | 9.3              | 50,850            | 4.1              | 2,240              | 1.1              | 48,610                        | 4.7              | 4.4                                   |
| 50-75   | 8,230              | 15.6             | 69,420            | 9.4              | 4,790              | 3.9              | 64,630                        | 10.5             | 6.9                                   |
| 75-100  | 5,870              | 11.2             | 98,340            | 9.5              | 9,490              | 5.4              | 88,850                        | 10.3             | 9.7                                   |
| 100-200   | 10,020             | 19.1             | 155,290           | 25.6             | 21,930             | 21.5             | 133,360                       | 26.4             | 14.1                                  |
| 200-500   | 3,830              | 7.3              | 323,890           | 20.4             | 65,800             | 24.6             | 258,090                       | 19.5             | 20.3                                  |
| 500-1,000   | 550                | 1.0              | 745,230           | 6.7              | 199,600            | 10.7             | 545,630                       | 5.9              | 26.8                                  |
| More than 1,000   | 270                | 0.5              | 3,659,240         | 16.1             | 1,187,540          | 31.1             | 2,471,700                     | 13.1             | 32.5                                  |
| All   | 52,600             | 100.0            | 115,550           | 100.0            | 19,440             | 100.0            | 96,110                        | 100.0            | 16.8                                  |

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

Note: Elderly tax units are those with either head or spouse (if filing jointly) age 65 or older.

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes both filing and non-filing units but excludes those that are dependents of other tax units. Tax units with negative adjusted gross income are excluded from their respective income class but are included in the totals. For a description of expanded cash income, see

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