

## DISTRIBUTIONAL ANALYSIS OF THE TAX CUTS AND JOBS ACT AS PASSED BY THE SENATE FINANCE COMMITTEE

## TPC Staff

November 20, 2017

The Tax Policy Center has released distributional estimates of the Senate version of the Tax Cuts and Jobs Act as passed by the Senate Finance Committee on November 16, 2017. We find the bill would reduce taxes on average for all income groups in both 2019 and 2025. In general, higher income households receive larger average tax cuts as a percentage of after-tax income, with the largest cuts as a share of income going to taxpayers in the 95<sup>th</sup> to 99<sup>th</sup> percentiles of the income distribution. On average in 2027, taxes would rise modestly for the lowest-income group, change little for middle-income groups, and decrease for higher-income groups. Compared to current law, 9 percent of taxpayers would pay more in 2019, 12 percent in 2025, and 50 percent in 2027.

he Senate Finance Committee Chairman's Mark of the Tax Cuts and Jobs Act, introduced on November 9, 2017, and passed by the Committee on November 16, 2017, would make major changes to the individual and corporate income taxes, estate and gift taxes, and certain federal excise taxes.<sup>1</sup> The bill would also repeal the Affordable Care Act's individual mandate, but the distributional estimates presented here do not include the effects of that provision.<sup>2</sup>

The Tax Policy Center has released distributional estimates of this legislation. We find the following:

• Compared to current law, taxes would fall for all income groups on average in 2019, increasing overall average after-tax income by 1.7 percent. In general, tax cuts as a percentage of after-tax income would be

<sup>&</sup>lt;sup>1</sup> This analysis is based on the version of the Tax Cuts and Jobs Act as ordered reported by the Senate Finance Committee on November 16, 2017. Descriptions of the bill as introduced and modified are available at JCX-51-17 and JCX-56R-17 on the Joint Committee on Taxation's website.

<sup>&</sup>lt;sup>2</sup> The effects of this provision are not included because only a small portion of the \$318 billion change in the federal budget deficit over the 2018-2027 period is due to a change in tax receipts. A recent report from the Congressional Budget Office of the tax and non-tax effects of repealing the individual mandate is available at <u>https://www.cbo.gov/publication/53300</u>.

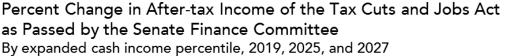
larger for higher-income groups, with the largest cuts as a share of income going to taxpayers in the 95th to 99th percentiles of the income distribution.

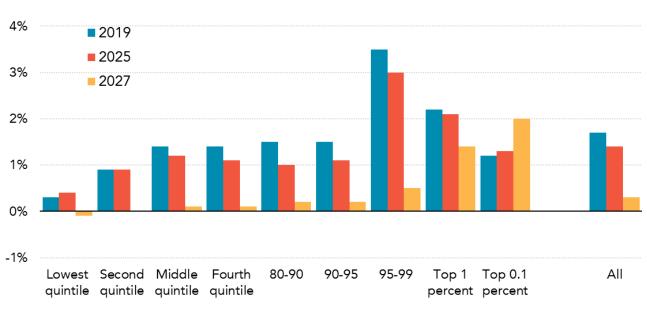
- The pattern of tax changes across income groups would be similar in 2025 (the last year before nearly all the individual provisions sunset) although the magnitude of average tax decreases would be slightly smaller for most income groups.
- In 2027, the overall tax reduction would be just 0.3 percent of after-tax income. On average, relative to current law, low-income taxpayers would experience a modest tax increase; middle-income taxpayers would see little change; and taxpayers in the top 1 percent would receive an average tax cut of 1.4 percent of after-tax income.
- Some taxpayers would pay more in taxes under the proposal in 2019 and 2025—about 9 percent of taxpayers in 2019 and 12 percent in 2025. In 2027, however, taxes would increase for 50 percent of taxpayers.

## DISTRIBUTIONAL EFFECTS

The Senate bill would have different effects on the distribution of tax burdens in different years, so we present results for 2019, 2025, and 2027 (figure 1).<sup>3</sup>

## FIGURE 1





Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1).

<sup>&</sup>lt;sup>3</sup> We do not show distributional results for 2018 because the combination of a broader corporate base in 2018 and no corporate rate cut until 2019 makes 2018 law unrepresentative of the effects of the proposal's corporate tax changes on taxpayers.

## <u>2019</u>

In 2019, taxes would be reduced by almost \$1,300 on average, increasing after-tax incomes 1.7 percent (table 1). Taxes would decline on average across all income groups. Taxpayers in the bottom quintile (those with income less than about \$25,000) would see an average tax cut of \$50, or 0.3 percent of after-tax income. Taxpayers in the middle income quintile (those with income between about \$50,000 and \$87,000) would receive an average tax cut of about \$900, or 1.4 percent of after-tax income. Taxpayers in the 95<sup>th</sup> to 99<sup>th</sup> income percentiles (those with income between about \$310,000 and \$750,000) would benefit the most as a share of after-tax income, with an average tax cut of about \$12,000 or 3.5 percent of after-tax income. Taxpayers in the top 1 percent of the income distribution (those with income more than \$750,000) would receive an average cut of \$34,000, or 2.2 percent of after-tax income.

## TABLE 1

## Distribution of Federal Tax Change of the Tax Cuts and Jobs Act as Passed by the Senate Finance Committee By expanded cash income percentile, 2019<sup>a</sup>



Expanded cash	Percent change in after-tax	Share of total federal tax change	Average federal tax change –	Average federal tax rate <sup>d</sup>		
income percentile <sup>b</sup>	income <sup>c</sup> (%)		(dollars)	Change (% points)	Under the proposal (%)	
Lowest quintile	0.3	1.0	-50	-0.3	3.9	
Second quintile	0.9	5.7	-330	-0.9	8.0	
Middle quintile	1.4	13.1	-850	-1.2	12.7	
Fourth quintile	1.4	18.4	-1,430	-1.2	16.2	
Top quintile	2.2	63.2	-5,740	-1.6	24.2	
All	1.7	100.0	-1,260	-1.3	18.7	
Addendum						
80-90	1.5	12.6	-2,230	-1.2	19.0	
90-95	1.5	8.5	-3,130	-1.2	21.0	
95-99	3.5	24.5	-11,610	-2.6	22.9	
Top 1 percent	2.2	17.6	-34,130	-1.4	31.7	
Top 0.1 percent	1.2	4.5	-85,640	-0.8	33.3	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1)

**Notes:** Number of Alternative Minimum Tax (AMT) taxpayers (millions): Baseline: 5.2; Proposal: 0. Itemizers (millions): Baseline: 48.6, Proposal: 10.3. (a) Calendar year. Baseline is current law. Proposal includes provisions contained in the Tax Cuts and Jobs Act as passed by the Senate Finance Committee on 11/16/2017. Excludes the effects of repealing the Affordable Care Act's Individual Shared Responsibility Payment (i.e., "individual mandate").

(b) Percentiles include 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. The income percentile classes used in this table are based on the income distribution for the entire population and contain an equal number of people, not tax units. The breaks are (in 2017 dollars): 20% \$25,400; 40% \$49,600; 60% \$87,400; 80% \$150,100; 90% \$217,800; 95% \$308,200; 99% \$746,100; 99.9% \$3,587,300. For a description of expanded cash income, see http://www.taxpolicycenter.org/TaxModel/income.cfm

(c) 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.

(d) 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.

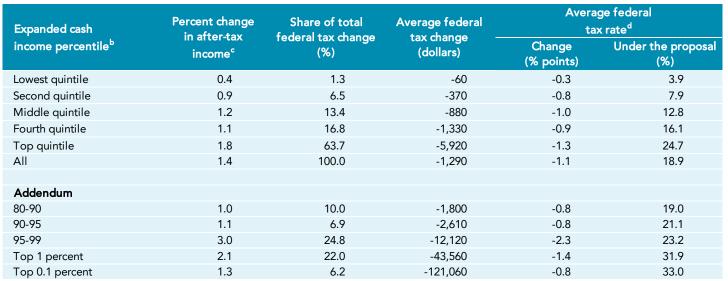
## <u>2025</u>

In 2025, the average tax cut would be \$1,300, or 1.4 percent of after-tax income (table 2). The magnitude of the average tax cut as a share of after-tax income would be smaller in 2025 than in 2019 for most income groups, mainly because the tax system would be indexed to the slower-growing chain-weighted consumer price index and because certain business tax incentives expire after 2022.

Taxpayers in the bottom quintile would see an average tax cut of \$60, or 0.4 percent of after-tax income. Taxpayers in the middle income quintile would receive an average tax cut of almost \$900, or 1.2 percent of after-tax income. Taxpayers in the 95<sup>th</sup> to 99<sup>th</sup> income percentiles would benefit the most as a share of after-tax income, with an average tax cut of \$12,100, or 3.0 percent of after-tax income. Taxpayers in the top 1 percent of the income distribution would receive an average cut of about \$44,000, or 2.1 percent of after-tax income.

## TABLE 2

## Distribution of Federal Tax Change of the Tax Cuts and Jobs Act as Passed by the Senate Finance Committee By expanded cash income percentile, 2025<sup>a</sup>



Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1)

Notes: Number of Alternative Minimum Tax (AMT) taxpayers (millions): Baseline: 5.7; Proposal: 0. Itemizers (millions): Baseline: 54.9, Proposal: 14.6.

(a) Calendar year. Baseline is current law. Proposal includes provisions contained in the Tax Cuts and Jobs Act as passed by the Senate Finance Committee on 11/14/2017. Excludes the effects of repealing the Affordable Care Act's Individual Shared Responsibility Payment (i.e., "individual mandate").

(b) Percentiles include 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. The income percentile classes used in this table are based on the income distribution for the entire population and contain an equal number of people, not tax units. The breaks are (in 2017 dollars): 20% \$27,300; 40% \$53,400; 60% \$91,700; 80% \$153,800; 90% \$224,400; 95% \$308,900; 99% \$837,800; 99.9% \$4,704,600. For a description of expanded cash income, see http://www.taxpolicycenter.org/TaxModel/income.cfm

(c) 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.

(d) 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.

## <u>2027</u>

In 2027, the overall average tax cut would be about \$300, or 0.3 percent of after-tax income (table 3), largely because almost all individual income tax provisions would sunset after 2025.

On average, taxes would be little changed for taxpayers in the bottom 95 percent of the income distribution. Taxpayers in the bottom quintile of the income distribution would face an average tax increase of 0.1 percent of after-tax income; taxpayers in the middle income quintile would receive an average tax cut of 0.1 percent of after-tax incomes; and taxpayers in the 95<sup>th</sup> to 99<sup>th</sup> income percentiles would receive an average tax cut of 0.5 percent of after-tax income. Taxpayers in the top 1 percent of the income distribution would receive an average tax cut of 1.4 percent of after-tax income.

## TABLE 3

Distribution of Federal Tax Change of the Tax Cuts and Jobs Act as Passed by the Senate Finance Committee



By expanded cash income percentile, 2027<sup>a</sup>

Expanded cash	Percent change in after-tax	Share of total federal tax change	Average federal tax change –	Average federal tax rate <sup>d</sup>	
income percentile <sup>b</sup>	income <sup>c</sup>	(%)	(dollars)	Change (% points)	Under the proposal (%)
Lowest quintile	-0.1	-1.0	10	0.1	4.4
Second quintile	0.0	-0.3	*	0.0	8.9
Middle quintile	0.1	2.9	-50	-0.1	13.8
Fourth quintile	0.1	7.2	-150	-0.1	16.8
Top quintile	0.6	90.0	-2,230	-0.5	25.8
All	0.3	100.0	-340	-0.3	19.9
Addendum					
80-90	0.2	7.1	-340	-0.1	19.6
90-95	0.2	5.6	-560	-0.2	21.7
95-99	0.5	15.5	-2,010	-0.4	25.2
Top 1 percent	1.4	61.8	-32,510	-0.9	32.5
Top 0.1 percent	2.0	39.8	-208,060	-1.3	32.5

**Source:** Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1)

**Notes:** Number of Alternative Minimum Tax (AMT) taxpayers (millions): Baseline: 5.6; Proposal: 6.0. Itemizers (millions): Baseline: 56.8, Proposal: 57.4. \* Non-zero value rounded to zero.

(a) Calendar year. Baseline is current law. Proposal includes provisions contained in the Tax Cuts and Jobs Act as passed by the Senate Finance Committee on 11/14/2017. Excludes the effects of repealing the Affordable Care Act's Individual Shared Responsibility Payment (i.e., "individual mandate").

(b) Percentiles include 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. The income percentile classes used in this table are based on the income distribution for the entire population and contain an equal number of people, not tax units. The breaks are (in 2017 dollars): 20% \$28,100; 40% \$54,700; 60% \$93,200; 80% \$154,900; 90% \$225,400; 95% \$304,600; 99% \$912,100; 99.9% \$5,088,900. For a description of expanded cash income, see http://www.taxpolicycenter.org/TaxModel/income.cfm

(c) 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.

(d) 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.

## WINNERS AND LOSERS

The impact of the proposal on individual taxpayers differs depending on their income sources, demographic and family statuses, and other characteristics that affect eligibility for certain tax benefits. Our estimates of the number of taxpayers that would pay more tax or less tax than under current law exclude certain minor provisions (listed in tables 4, 5, and 6) for which it is difficult to assign the tax changes to specific taxpayers.<sup>4</sup> Overall, the excluded provisions represent a net tax increase, so we are overestimating the number of taxpayers that would see a tax cut and underestimating the number of taxpayers that would see a tax increase.

In 2019, 76 percent of taxpayers would receive a tax cut from the included provisions, averaging almost \$2,000, and about 9 percent would face an average tax increase of about \$2,700 (table 4).<sup>5</sup> In the bottom income quintile, 53 percent would receive a tax cut and 2 percent would face a tax increase. In the middle income quintile, 88 percent would receive a tax cut and 11 percent would face a tax increase. In the top 1 percent of the income distribution, 86 percent would receive a tax cut and 14 percent would face a tax increase.

#### TABLE 4

Tax Units with a Tax Change from Major Provisions of the Tax Cuts and Jobs Act as Passed by the Senate Finance Committee By expanded cash income percentile, 2019<sup>a</sup>

Expanded cash income percentile <sup>b</sup>	Tax units with tax cut or increase <sup>c</sup>				Average federal tax change	
	With tax cut		With tax increase			
	Percent of tax units	Average tax cut	Percent of tax units	Average tax increase	All Provisions	Major Provisions included here
Lowest quintile	52.8	-110	1.5	840	-50	-50
Second quintile	85.4	-430	5.1	810	-330	-330
Middle quintile	87.9	-1,100	10.8	980	-850	-860
Fourth quintile	83.6	-2,020	16.0	1,490	-1,430	-1,450
Top quintile	83.7	-8,060	16.2	6,080	-5,740	-5,760
All	76.3	-1,970	8.5	2,680	-1,260	-1,270
Addendum						
80-90	82.1	-3,180	17.7	1,840	-2,230	-2,280
90-95	79.6	-4,540	20.4	2,000	-3,130	-3,210
95-99	92.9	-12,980	7.1	5,120	-11,610	-11,690
Top 1 percent	86.0	-54,540	14.0	98,290	-34,130	-33,190
Top 0.1 percent	70.5	-257,250	29.5	342,070	-85,640	-80,310

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1)

Notes: Number of Alternative Minimum Tax (AMT) taxpayers (millions): Baseline: 5.2; Proposal: 0. Itemizers (millions): Baseline: 48.6, Proposal: 10.3.

(a) Calendar year. Baseline is current law. Proposal includes provisions contained in the modified Chairman's Mark as passed by the Senate Finance Committee on 11/14/2017. Excludes the effects of repealing the Affordable Care Act's Individual Shared Responsibility Payment (i.e., "individual mandate"). Due to data limitations, this table also excludes the following provisions: repeal of exclusion for employer-provided qualified moving expense reimbursements; repeal of deduction for moving expenses (other than members of the Armed Forces); simplified accounting for small business; limitation on deduction by employers of expenses on qualified transportation fringes; modification of limitation on excessive employee remuneration; 20 percent excise tax on excess tax-exempt organization executive compensation; repeal of advanced refunding bonds; tax gain on the sale of a partnership interest on look-thru basis; and Craft Beverage Modernization and Tax Reform.

(b) Percentiles include 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. The income percentile classes used in this table are based on the income distribution for the entire population and contain an equal number of people, not tax units. The breaks are (in 2017 dollars): 20% \$25,400; 40% \$49,600; 60% \$87,400; 80% \$150,100; 90% \$217,800; 95% \$308,200; 99% \$746,100; 99.9% \$3,587,300. For a description of expanded cash income, see http://www.taxpolicycenter.org/TaxModel/income.cfm (c) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

<sup>&</sup>lt;sup>4</sup> We do include the average effect of these provisions by income group in tables 1-3, but their effects vary substantially within each group and we do not have the information necessary to assign the tax changes to specific individuals or households.

<sup>&</sup>lt;sup>5</sup> The remaining 15 percent of taxpayers would see no material change in their tax burden.

In 2025, 74 percent of taxpayers would experience a tax cut from the included provisions averaging almost \$2,300, and 12 percent would face an average tax increase of almost \$2,800 (table 5). In the bottom income quintile, 56 percent would receive a tax cut and 4 percent would face a tax increase. In the middle income quintile, 85 percent would receive a tax cut and 14 percent would face a tax increase. In the top 1 percent of the income distribution, 83 percent would receive a tax cut and 17 percent would face a tax increase.

## TABLE 5

# Tax Units with a Tax Change from Major Provisions of the Tax Cuts and Jobs Act as Passed by the Senate Finance Committee



By expanded cash income percentile, 2025<sup>a</sup>

Expanded cash income percentile <sup>b</sup>	Tax units with tax cut or increase <sup>c</sup>				Average federal tax change	
	With tax cut		With tax increase			Mater Deviat
	Percent of tax units	Average tax cut	Percent of tax units	Average tax increase	All Provisions	Major Provisions included here
Lowest quintile	55.8	-150	4.4	400	-60	-60
Second quintile	82.4	-530	6.9	810	-370	-380
Middle quintile	84.6	-1,250	14.0	1,170	-880	-890
Fourth quintile	78.8	-2,230	20.9	1,850	-1,330	-1,370
Top quintile	76.3	-9,940	23.5	6,070	-5,920	-6,160
All	74.1	-2,250	12.2	2,750	-1,290	-1,330
Addendum						
80-90	72.5	-3,390	27.3	2,170	-1,800	-1,870
90-95	71.3	-4,780	28.4	2,400	-2,610	-2,730
95-99	91.4	-14,200	8.6	6,910	-12,120	-12,380
Top 1 percent	83.1	-77,190	16.9	106,590	-43,560	-46,200
Top 0.1 percent	70.7	-360,430	29.2	417,090	-121,060	-132,970

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1)

Notes: Number of Alternative Minimum Tax (AMT) taxpayers (millions): Baseline: 5.7; Proposal: 0. Itemizers (millions): Baseline: 54.9, Proposal: 14.6.

(a) Calendar year. Baseline is current law. Proposal includes provisions contained in the Tax Cuts and Jobs Act as passed by the Senate Finance Committee on 11/14/2017. Excludes the effects of repealing the Affordable Care Act's Individual Shared Responsibility Payment (i.e., "individual mandate"). Due to data limitations, this table also excludes the following provisions: repeal of exclusion for employer-provided qualified moving expense reimbursements; repeal of deduction for moving expenses (other than members of the Armed Forces); simplified accounting for small business; limitation on deduction by employers of expenses on qualified transportation fringes; modification of limitation on excessive employee remuneration; 20 percent excise tax on excess tax-exempt organization executive compensation; repeal of advanced refunding bonds; and tax gain on the sale of a partnership interest on look-thru basis.

(b) Percentiles include 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. The income percentile classes used in this table are based on the income distribution for the entire population and contain an equal number of people, not tax units. The breaks are (in 2017 dollars): 20% \$27,300; 40% \$53,400; 60% \$91,700; 80% \$153,800; 90% \$224,400; 95% \$308,900; 99% \$837,800; 99.9% \$4,704,600. For a description of expanded cash income, see http://www.taxpolicycenter.org/TaxModel/income.cfm (c) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

In 2027, 28 percent of taxpayers would experience a tax cut from the included provisions averaging about \$1,600, and 50 percent would face an average tax increase of about \$200 (table 6). In the bottom income quintile, 12 percent would receive a tax cut and 32 percent would face a tax increase. In the middle income quintile, 28 percent would receive a tax cut and 66 percent would face a tax increase. In the top 1 percent of the income distribution, 83 percent would receive a tax cut and 17 percent would face a tax increase.

#### TABLE 6

# Tax Units with a Tax Change from Major Provisions of the Tax Cuts and Jobs Act as Passed by the Senate Finance Committee



By expanded cash income percentile, 2027<sup>a</sup>

Expanded cash income percentile <sup>b</sup>	Tax units with tax cut or increase <sup>c</sup>				Average federal tax change	
	With tax cut		With tax increase			
	Percent of tax units	Average tax cut	Percent of tax units	Average tax increase	All Provisions	Major Provisions included here
Lowest quintile	11.8	-130	32.4	80	10	10
Second quintile	24.7	-310	56.0	130	*	*
Middle quintile	27.5	-550	65.6	140	-50	-60
Fourth quintile	38.2	-720	58.9	170	-150	-180
Top quintile	53.0	-4,920	45.7	380	-2,230	-2,430
All	28.0	-1,640	50.3	170	-340	-380
Addendum						
80-90	44.3	-1,210	54.0	280	-340	-380
90-95	57.1	-1,450	41.6	430	-560	-640
95-99	63.9	-3,850	35.4	690	-2,010	-2,220
Top 1 percent	83.0	-42,410	16.8	980	-32,510	-35,010
Top 0.1 percent	98.1	-223,970	1.8	1,510	-208,060	-219,720

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0217-1)

Notes: Number of Alternative Minimum Tax (AMT) taxpayers (millions): Baseline: 5.6; Proposal: 6.0. Itemizers (millions): Baseline: 56.8, Proposal: 57.4.

\* Non-zero value rounded to zero.

(a) Calendar year. Baseline is current law. Proposal includes provisions contained in the Tax Cuts and Jobs Act as passed by the Senate Finance Committee on 11/14/2017. Excludes the effects of repealing the Affordable Care Act's Individual Shared Responsibility Payment (i.e., "individual mandate"). Due to data limitations, this table also excludes the following provisions: repeal of exclusion for employer-provided qualified moving expense reimbursements; repeal of deduction for moving expenses (other than members of the Armed Forces); simplified accounting for small business; limitation on deduction by employers of expenses on qualified transportation fringes; modification of limitation on excessive employee remuneration; 20 percent excise tax on excess tax-exempt organization executive compensation; repeal of advanced refunding bonds; and tax gain on the sale of a partnership interest on look-thru basis.

(b) Percentiles include 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. The income percentile classes used in this table are based on the income distribution for the entire population and contain an equal number of people, not tax units. The breaks are (in 2017 dollars): 20% \$28,100; 40% \$54,700; 60% \$93,200; 80% \$154,900; 90% \$225,400; 95% \$304,600; 99% \$912,100; 99.9% \$5,088,900. For a description of expanded cash income, see http://www.taxpolicycenter.org/TaxModel/income.cfm (c) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

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