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GOP budget plans aimed at expediting tax reform wind through House, Senate

Republicans in the House of Representatives successfully cleared a long-stalled fiscal year 2018 budget resolution this week drafted, in part, with an eye toward fast-tracking revenue-neutral tax reform. Across the Capitol, meanwhile, GOP members of the Senate Budget Committee advanced their own budget plan designed to move a net tax cut of as much as $1.5 trillion.

Similarities, but also many differences

The two budget resolutions, while broadly similar in the sense that both would rely on so-called "budget reconciliation" instructions to advance subsequent tax legislation on a filibuster-proof basis in the Senate, also are notably different in several respects. Assuming the Senate Budget Committee-reported blueprint ultimately clears the full chamber later this month, those differences will need to be ironed out in a House-Senate conference committee and agreed to by GOP majorities in both chambers before the reconciliation process can be unlocked. (Provided strict parliamentary and procedural rules are met, legislation moved under budget reconciliation can pass the House and Senate with a simple majority vote, making it a potentially powerful tool for Republicans who control 52 Senate seats, short of the three-fifths majority – that is, 60 votes – normally needed to advance legislation under regular order in that chamber.)

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House plan: House Budget Committee Chair Diane Black, R-Tenn., successfully shuttled the blueprint through her panel on July 19, but its consideration by the full chamber had been held up since that time as members of the conservative House Freedom Caucus demanded additional details from congressional and White House negotiators on what tax reform would look like before giving their assent to a budget bill intended to fast-track a tax code overhaul.

Those reservations melted away, however, after the so-called "Big Six" tax reform negotiating group – comprised of House Speaker Paul Ryan, R-Wis., House Ways and Means Committee Chairman Kevin Brady, R-Texas, Senate Majority Leader Mitch McConnell, R-Ky., Senate Finance Committee Chairman Orrin Hatch, R-Utah, Treasury Secretary Steven Mnuchin, and National Economic Council Director Gary Cohn – released their "unified framework" on tax reform September 27. (For prior coverage of the Big Six framework, see *Tax News & Views*, Vol. 18, No. 33, Sept. 27, 2017.)
URL: http://newsletters.usdbriefs.com/2017/Tax/TNV/170927_1.html

The House ultimately passed its budget resolution on October 5 on a party-line 219-206 vote.

In addition to calling for subsequent *revenue-neutral* tax reform legislation to be moved under the budget reconciliation process, the plan also directs 11 committees to report a total of $203 billion in deficit-cutting legislation. Though the budget resolution itself cannot specify particular policies to be reported by other committees, the policy document accompanying the budget is clear that these savings should be generated within mandatory spending programs such as the Supplemental Nutrition Assistance Program (food stamps) and Temporary Assistance for Needy Families (TANF), and through other actions such as medical malpractice reform.

This vision – which would essentially tie tax reform's filibuster-free status in the Senate under reconciliation to the concurrent movement of tens of billions of dollars of (sometimes controversial) spending cuts – was defended by Rep. Black on October 4.

"If we continue to spend more than what we bring in year after year, it doesn't matter how much tax reform we do. We have got to have restraint on what we spend," Black said.

As approved, the plan would reach balance by 2027 – the last year in the budget's 10-year window – through an offsetting mix of:

- Roughly $5.4 trillion in total spending cuts (that is, the "reconciled" cuts plus additional proposed spending reductions on programs such as Medicare, Medicaid, and nondefense appropriations);
- $1.1 trillion in tax cuts (due to an assumption that, apart from tax reform, the Affordable Care Act, including its various tax increases, is fully repealed); and
- $1.5 trillion in assumed savings from additional economic growth ($300 billion of which the plan states should be dedicated to helping make tax reform budget-neutral).

Senate plan: By contrast, the upper chamber's fiscal year 2018 budget resolution – drafted by Senate Budget Committee Chairman Mike Enzi, R-Wyo., and passed through committee October 5 on a party-line vote of 12-11 – is less fiscally ambitious and less specific in terms of policy.

On taxes, it incorporates a handshake deal between Budget Committee Republicans Bob Corker of Tennessee and Pat Toomey of Pennsylvania that would direct the Finance Committee – through a reconciliation instruction – to report legislation that would reduce revenues by as much as $1.5 trillion over the next 10 years. (For more on that deal between Corker, a fiscal hawk, and Toomey, an avid tax-cutter, and its potential interplay with the "Byrd Rule" restriction against increasing long-run deficits, see *Tax News & Views*, Vol. 18, No. 32, Sept. 22, 2017.)
URL: http://newsletters.usdbriefs.com/2017/Tax/TNV/170922_1.html

The plan also would exempt the follow-on tax reconciliation bill from the Senate's Pay-As-You-Go rule – which normally takes 60 votes to waive.

But unlike that House plan, which also seeks to expedite movement of tens of billions of dollars of spending cuts alongside tax reform, the Senate budget includes just one other reconciliation instruction – this one to the Energy and Natural Resources Committee, calling for $1 billion in deficit reduction ostensibly aimed at expanding oil production in the Arctic National Wildlife Refuge.

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The Senate plan also calls for nearly $4.9 trillion in additional spending cuts – mainly coming from unspecified cuts to mandatory spending programs and to a lesser extent from nondefense appropriations – and derives roughly $1.4 trillion of assumed savings from added economic growth. However, due to the tax-cutting instruction to the Finance Committee, the plan is not able achieve balance within the 10-year budget window. (The plan does, however, claim to achieve "on-budget" balance by 2026 – a characterization that excludes "off-budget" accounts such as Social Security and the postal service.)

'Current policy' revenue baseline, 'dynamic' scoring off the table?: Notably, neither the House nor the Senate budget resolution attempts to modify the revenue baseline against which the Congressional Budget Office (CBO) and Joint Committee on Taxation (JCT) would measure the fiscal impact of a future tax reform bill – for example, by assuming certain temporary tax provisions such as bonus depreciation are instead extended indefinitely ("current policy") rather than being allowed to lapse as under CBO and JCT's current scoring methodology that is rooted in the concept of "current law."

Nor do the budget plans specifically call for the use of so-called "dynamic" scores – that is, revenue estimates that incorporate the feedback effects on revenue levels of changes in the overall economy – in the context of measuring whether any subsequent tax bill complies with the reconciliation instruction (revenue-neutral in the case of the case of the House, and a tax cut of no more than $1.5 trillion in the case of the Senate). The Senate plan does repeat largely similar dynamic scoring language from a prior budget resolution that requires CBO and JCT to produce such estimates in certain cases, but those estimates are understood to be only supplementary, or informational, in nature in that chamber.

It had been assumed that Republicans would lean on one or both of these tactics to make the budget math of tax reform a bit less onerous – for example, the House Republican tax reform "blueprint" released in June of 2016 specifically called for the use of both a current policy baseline and dynamic scoring. However, in recent weeks it has become far less clear to some observers to what extent the Senate parliamentarian would allow them in determining whether any tax reconciliation bill complied with the various procedural and budgetary rules that go along with the reconciliation process, which may help explain their omission.

What's next?

The Senate is scheduled to be out of session during the week of October 9. As a result, a floor vote on the Senate blueprint is not expected until the week of October 16. Assuming the Senate GOP rallies behind the plan in sufficient numbers and passes it – they can afford to lose no more than two votes, given near-certain unanimous Democratic opposition – negotiations would then ensue with the House. It is likely not until after any conference agreement passes both chambers that tax reform mark-ups could occur in the taxwriting committees pursuant to reconciliation – although it is possible that draft legislative text could be released before any formal mark-ups occur.

Given the notable differences between the two chambers' budget plans, the duration and difficulty of any negotiations remains unclear. Some in the House GOP are already conceding, however, that they will likely have to move more toward the Senate's vision than vice versa, given the slim majority Republicans maintain in the upper chamber.

"Buckle up, get ready, because what we're going to be voting on – the final budget resolution – will not be what leaves the House. That's reality," said Rep. Charlie Dent, R-Pa., on October 4 in advance of the House's budget vote.

And other Republicans increasingly see the budget resolution this year as nothing more than a formality to get reconciliation instructions in place for tax reform – just as the fiscal year 2017 budget resolution and the reconciliation instructions that flowed from it were used as a means to advance legislation to repeal and replace the Affordable Care Act, albeit unsuccessfully – a reality that could make conference negotiations less contentious.

"Look, the budget itself is always a joke. It's a total joke. It's not worth the paper that it's written on," said Senate Republican Bob Corker. "This is a vehicle to begin a debate on tax reform."

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Tax reform messaging wars continue

Lawmakers on Capitol Hill and interest groups in the tax community this week continued to weigh in on the recently released tax reform framework from the "Big Six" Republican negotiating team and on what they do – and don't – want to see included in a yet-to-be-written tax reform package.

GOP takes on Tax Policy Center analysis

Much of the debate centered on a preliminary analysis of the Big Six framework published by the Tax Policy Center, a joint think tank of the Brookings Institution and the Urban Institute, which concluded that, based on its assumptions, taxpayers in the top 1 percent (earning more than $730,000 a year) would claim half of all benefits under the Big Six's plan if it were enacted into law. The report, which was released September 29, also estimated that the plan would result in a revenue loss of $2.4 trillion on a static basis in the first decade, and $3.2 trillion in the second 10 years.
URL: http://www.taxpolicycenter.org/sites/default/files/publication/144971/a_preliminary_analysis_of_the_unified_framework_0.pdf

Republicans – especially House Ways and Means Chairman Kevin Brady of Texas, who called the Tax Policy Center report "a work of fiction that Stephen King would be proud of" in a Fox News Radio interview October 3 – have pushed back hard on the analysis, arguing that it is based on too many assumptions since many of the specific details are still being worked out and the bill itself is still being drafted. In speeches and interviews throughout the past week, members of the Big Six, along with GOP taxwriters, rank-and-file Republicans, and administration officials, and have argued that the tax reform legislation will provide the biggest benefit for middle-class families.

House Speaker Paul Ryan, R-Wis., pointed to plans to double the standard deduction, expand somewhat the child tax credit, and maintain current-law incentives for mortgage interest and charitable giving.

"Those are all middle-class tax things," he said. "The purpose of this is to help people who are living by a paycheck keep more of their own hard-earned money but also get more jobs, a faster-growing economy."

(Ryan and Brady are both members of the Big Six, along with Senate Finance Committee Chairman Orrin Hatch, R-Utah, Senate Majority Leader Mitch McConnell, R-Ky., Treasury Secretary Steven Mnuchin, and National Economic Council Director Gary Cohn.)

At a press conference on October 5, Senate Democratic Leader Charles Schumer of New York decried Republicans' message that their tax reform plan is targeted at middle-class relief.

"I've never heard such a fraudulent statement," he said.

SALT licking

One of the more contentious proposals in the GOP framework is the presumed elimination of the state and local tax (SALT) deduction. (The framework does not address SALT by name but does call for eliminating "most itemized deductions" with only a few explicit exceptions.)

While the change would largely impact Democratic-leaning states, there is a large enough contingent of Republican House members whose constituents disproportionately claim the current-law deduction that GOP leaders are being forced to reconsider the proposal and look at a potential compromise. The elimination of SALT is unofficially estimated to raise $1.2 trillion in revenue to offset tax cuts and other changes, so dropping the proposal entirely would put a big hole in the current framework.

Ways and Means Chairman Brady this week reportedly discussed alternatives – including capping the SALT deduction for the highest earners and allowing taxpayers to choose between deducting mortgage interest or property taxes – with several GOP members who oppose eliminating the deduction outright.

Rep. Tom MacArthur, R-N.J., a leading voice of opposition, said his preferred approach would be to create a new tax credit that combines mortgage interest and property taxes.

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"This tax break is on the back of six or seven states. [Tax reform] can't pass in this form," he said.

Speaking on Hugh Hewitt's radio show October 4, Brady rebuffed reports that Republicans had already agreed to scrap the elimination of the tax break but added, "Here's what I can confirm: that we are listening to lawmakers, especially those in high-tax states, where those governors and those mayors are really putting the screws to hard-working taxpayers. We want to make sure we lower taxes for every American, regardless of where they live."

But White House Press Secretary Sarah Huckabee Sanders told reporters October 5 that President Trump may be less interested in compromising on the SALT deduction.

"The president's been clear about his position and we're moving forward with the framework that we've laid out," she said when asked if the administration was open to negotiation on the issue.

Estate tax

Also meeting some resistance from within the Republican party is the framework's proposed elimination of the estate tax, which will affect about 5,500 families this year. While abolishing the tax has been a longtime GOP goal, at least two senators this week pushed back on its inclusion in tax reform, arguing that the revenue that would be lost could be better used to enhance other favorable tax provisions in the bill being crafted, and several others said the provision wasn't a top priority for them.

"I don't think we have to totally repeal it because I think the folks on the upper end of it are all avoiding it right now legally anyway," Sen. Mike Rounds, R-S.D., told the *Wall Street Journal* October 5. "For me, we can't fail on [tax reform] and whatever we can do to pick up the last few votes we may need, I'm ready to negotiate."

Rounds suggested this week doubling or tripling the current exemption rather than repealing the tax outright.

Maine Republican Susan Collins told reporters that "[w]e've taken care of the problem for the vast majority of family-owned businesses or ranchers in this country," referring to the increased exemption level and generally lower rate that has been levied on estates over the years. "So that is not a priority for me as we seek to craft this tax bill."

The Congressional Budget Office has estimated that the estate tax will raise $25 billion to $34 billion annually over the next 10 years.

Taxing the 1 percent

Another lynchpin of Republican tax orthodoxy that looked shakier this week was a reduced rate for the highest earners. The current top individual rate is 39.6 percent. The Big Six framework calls for a new top rate of 35 percent, but in an acknowledgment of criticism that the plan would be a boon for wealthy taxpayers, the document also notes that "[a]n additional top rate may apply to the highest-income taxpayers to ensure that the reformed tax code is at least as progressive as the existing tax code and does not shift the tax burden from high-income to lower- and middle-income taxpayers."

Several members of the conservative House Freedom Caucus – typically vociferous proponents of tax cuts across all income levels – told *Politico* this week they could support a bill that with a fourth bracket that keeps the current top rate in place. Several said their preference would be to lower the rate but that they place a higher priority on completing tax reform that lowers rates for the majority of taxpayers.

"It wouldn't be a reason I'd vote against tax reform, let me put it that way," said Rep. Thomas Massie, R-Ky. "It wouldn't be a show-stopper for me."

Proposed income thresholds have not yet been released for any of the new brackets.

Push for Democratic support

Democrats have generally been cool to – or in some cases outraged by – the Republicans' tax reform proposal; nonetheless, there are still efforts underway by GOP leaders to coax some of their Democratic colleagues into crossing the aisle. Ways and Means Chairman Brady reportedly met October 4 with members of the moderate, pro-growth New

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Democratic Coalition (which has about 60 members) and the centrist "Blue Dog" Coalition (18 members) to hear their views. The New Democratic Coalition has said it supports modernizing the tax code in a way that would make US businesses more competitive internationally, and it has called for a bipartisan approach to tax reform. Blue Dogs have expressed support for lower rates for corporations and passthroughs but maintain that tax reform should focus on the middle class, be revenue neutral, and move through Congress on a bipartisan basis under regular order. An aide to the Blue Dog Coalition told *Politico* after the meeting that "[t]he Blue Dog leadership walked out feeling it was positive and that the door to bipartisan efforts on tax reform is certainly not closed."

At the same time, Americans for Prosperity, a conservative advocacy organization funded by the Koch brothers, will undertake a $4.5 million television advertising campaign this month lobbying Democratic Sens. Tammy Baldwin of Wisconsin, Joe Donnelly of Indiana, and Claire McCaskill of Missouri, to support the GOP's tax reform framework. All three senators are up for re-election next year in states won by President Trump. Their support for reform could prove critical in getting a bill through the Senate if some Republicans cannot be convinced to vote for it.

For their part, the Democrats on the House Ways and Means Committee sent a letter to Chairman Brady September 28 demanding a "fully executed conventional revenue estimate" from the Joint Committee on Taxation (JCT), along with a JCT distributional analysis, macroeconomic analysis, and a technical explanation for any tax reform legislation to be considered by the committee. The letter harkened back to the lengthy path that the 1986 tax reform bill took and cited recent failed Republican attempts to repeal the Affordable Care Act as an example of what can happen when lawmakers move legislation without first undertaking a comprehensive analysis.
URL: http://newsletters.usdbriefs.com/2017/Tax/TNV/171006_2suppA.pdf

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Senate taxwriters discuss 'minimum tax,' deemed repatriation at international tax reform hearing

Lawmakers and witnesses at an October 3 Senate Finance Committee hearing on international tax reform wrestled with questions around how to design a proposed "minimum tax" to prevent US base erosion and how to structure a proposed deemed repatriation tax that would serve as a transition to a new territorial tax regime.

The unified GOP tax reform framework released by a team of White House officials and congressional Republican leaders (dubbed the "Big Six") on September 27 calls for a corporate tax rate of 20 percent (reduced from 35 percent under current law) and outlines a transition from our current worldwide system for taxing foreign-source income of US multinationals – where US companies are taxed on profits regardless of where they are earned – to a territorial system in which only income earned in the US would be taxable. According to the framework, this would be accomplished with a 100 percent exemption on dividends paid to US companies by their foreign subsidiaries. However, the framework leaves the details for the transition as well as base erosion measures to the Senate Finance Committee and House Ways and Means Committee.

Minimum tax: Global or country-by-country?

A transition to a territorial system has long been promoted as a way to bring US tax rules in line with our trading partners, almost all of whom have territorial systems of some sort, and address the issues of deferred earnings remaining stashed overseas; but issues arise when contemplating how to protect the US tax base from erosion after the transition. Because a territorial system would exempt income earned overseas from US tax, new rules would need to be put in place to prevent US companies from moving profits to offshore jurisdictions with more favorable tax rates.

While the US cannot prevent this completely, its effects are mitigated through the current subpart F regime, which forces US businesses to pay taxes on certain passive-type or readily moveable income earned by certain foreign subsidiaries. If the income is earned by a controlled foreign corporation (that is, a foreign corporation in which certain US shareholders directly, indirectly, or constructively hold a majority interest by vote or value), then the earnings are included in a US shareholder's taxable income even if the earnings are not actually repatriated, which helps shore up the US tax base.

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As Senate Finance Committee Chairman Orrin Hatch, R-Utah said in his opening remarks at the hearing, the subpart F regime was created in the 1960s to address increasing shifting of income and production overseas. According to Hatch, these rules in combination with our comparatively high statutory tax rate have led to income shifting and sophisticated tax planning that erodes the US tax base.

The Big Six framework calls for "rules to protect the US tax base by taxing at a reduced rate and on a global basis the foreign profits of US multinational corporations" but offers no additional elaboration. The word "global," has led many to hypothesize that the base erosion mechanism would be a global minimum tax, meaning a corporation would average taxes paid across all jurisdictions to determine whether or not it had reached whatever global minimum level was set. (Then-House Ways and Means Chairman Dave Camp, R-Mich., called for a minimum tax of 15 percent on certain income earned outside the US in the tax reform proposal he introduced in 2014.)

However, at least two of the witnesses at the hearing encouraged lawmakers to apply a stricter standard. Kimberly Clausing, a professor of economics at Reed College, said the minimum tax needed to be calculated on a country-by-country basis rather than a global basis. A global minimum tax, which she called "toothless," would allow companies to use taxes paid in high-tax jurisdictions like Europe to offset very minimal tax paid in low-tax jurisdictions considered "havens."

Clausing explained this more fully in response to a question from Sen. Johnny Isakson, R-Ga.

"If you earn income in Bermuda, say, where the tax rate is zero, that per country minimum tax would tax the Bermuda income right away," Clausing said. "If you have a global minimum tax you could use taxes paid in Germany to offset the Bermuda income and then you have an incentive to move income to both Bermuda and Germany."

Steven Shay, a professor of law at Harvard Law School, also encouraged a country-by-country minimum tax. He argued that to truly combat base erosion the rate should be set at 60 to 80 percent of the US corporate rate – that is, 12 to 16 percent based on the 20 percent corporate rate proposed in the framework.

Itai Grinberg, a professor of law at Georgetown University Law Center, cautioned lawmakers that rules to calculate taxes paid on a country-by-country basis would be very difficult to administer, as multinationals do not operate in that way nor would they have these records. In response to a question from Finance Committee member Bill Cassidy, R-La., Grinberg said companies would likely be able to use transfer pricing agreements to get around a country-by-country minimum. Instead, Grinberg argued for an inbound minimum tax that would tax all activity in the US the same regardless of whether the parent company is domestic or foreign. (The House GOP tax reform blueprint released by Ways and Means Committee Chairman Kevin Brady, R-Texas, and Speaker Paul Ryan, R-Wis., in June of last year included a form of an inbound minimum – specifically, a border-adjustment tax that would impose a 20 percent tax on goods and services imported into the US, regardless of where they are produced but impose no tax on goods and services exported from the US, again regardless of their production location. The border-adjustment tax proposal proved to be divisive among lawmakers and within the business community, however, and was officially rejected as an option for tax reform in the consensus statement that members of the Big Six released in July of this year.)
URL: https://www.republicanleader.senate.gov/newsroom/press-releases/joint-statement-on-tax-reform

Brett Wells, a professor of law at Houston University Law Center, also argued the best approach would be an inbound, source-based rule instead of a global minimum tax or the current subpart F regime. He contended that as long as the rules treat foreign-parented multinationals more favorably than their US counterparts, there will always be incentives to shift income and jobs overseas.

Deemed repatriation: Bifurcated rates or not?

Another frequently discussed issue in the transition from a worldwide to a territorial system of taxation is how to tax previously untaxed foreign-source earnings. Various reports suggest that the amount of capital currently sitting offshore is upwards of $2 trillion dollars, so a tax on that income would generate a significant amount of revenue to offset the cost of a corporate rate reduction and other relief included in an eventual tax reform bill.

Sen. Isakson outlined the gravity of getting the transition right and missing the one chance to collect this revenue.

"Effectively going to a territorial system ends the repatriation issue for Congress because it [the revenue] goes away," he said.

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Prior reform plans have included a "deemed" repatriation provision under which previously untaxed foreign-source earnings would be subject to a one-time levy – payable over several years – at a rate that is both lower than the statutory rate and bifurcated based on type of asset. Both the Camp proposal in 2014 and the House GOP blueprint in 2016 proposed a bifurcated rate of 8.75 percent for cash or cash equivalents and 3.5 percent for illiquid assets, with the resulting tax payable over eight years.

The Big Six framework provides for a deemed repatriation tax but offers few details other than stating there would be a different rate for cash and cash equivalents than for illiquid assets.

In response to a question from Finance Committee member Bill Cassidy, all the witnesses agreed that bifurcated rates would lead to planning by businesses, especially if those rates are announced in advance.

"It's not a good idea to announce to sophisticated businesspeople that if you shift your offshore earnings from cash into illiquid assets, which has already in essence been announced, you're going to get a lower rate by 4 percent" Shay argued.

Additionally, Shay and Clausing both discouraged lawmakers from offering a reduced rate for repatriation of pre-effective date earnings. Clausing argued in her opening remarks that because that income had already been earned, there was no reason to reduce the rate, as it would not create new economic activity and would lose revenue.

Carrots and sticks

Sen. Cassidy also inquired whether a system such as a "patent box" – a regime of preferential tax rates for certain intellectual property kept in a country's tax base – would create the "proper balance of carrots and sticks" to reduce some of the base erosion issues the US has faced and boost development of intangibles domestically.

Witnesses seemed split on the efficacy of patent boxes, which Grinberg said were blessed by the Organization for Economic Cooperation and Development and thus have become more common. Shay argued that the tax incentives should be based on where the actual research and development was performed.

Wells encouraged taxwriters to take a holistic approach rather than targeting one type of income. He also argued that Treasury should write additional regulations under section 367(d), which governs outbound transfers of intangibles.

Sen. Rob Portman, R-Ohio, said in his closing remarks that intellectual property tends to bring jobs with it as various countries have enacted rules regarding research and development. Shay argued these types of incentives simply lower the effective tax rates for certain taxpayers, creating additional complications. However, Grinberg said that lowering the rate would help to reduce base erosion. He also added that rules need to be in place to repatriate intellectual property that has been transferred overseas. Clausing agreed with Shay that lower rates were not enough, citing her research that showed 80 percent of outbound payments went to 7 havens with effective tax rates in the single digits.

Portman had asked earlier about carve-outs for active businesses like those used in the European Union and Japan. Grinberg cautioned against these, calling them narrow and capable of doing more harm than good. For example, a rule that requires more people physically present in a subsidiary before it is considered "active" (intended to limit the number of businesses eligible for such a carve-out) may simply encourage a company to send more jobs overseas.

Clausing also encouraged members to consider prior "off the shelf" proposals to combat base erosion, such as an exit tax on companies who change their domicile or an increased ownership threshold in inversion transactions for determining when the inverted entity is considered foreign.

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Treasury announces actions aimed at reducing tax regulatory burdens

The Treasury Department released a report October 4 outlining actions it plans to take on eight tax regulations that it identified earlier this year as unduly burdensome. Treasury also announced that it continues to work to identify additional regulations for modification or repeal by evaluating significant regulations issued recently and initiating a comprehensive review of all regulations.
URL: https://www.treasury.gov/press-center/press-releases/Documents/2018-03004_Tax_EO_report.pdf

Details on Treasury's plans are available in this alert from Deloitte Tax LLP.
URL: http://newsletters.usdbriefs.com/2017/Tax/TNV/171006_4suppA.pdf

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