

ESTIMATED REVENUE EFFECTS OF THE CHAIRMAN'S AMENDMENT IN THE NATURE OF A SUBSTITUTE TO H.R. 7,
THE "CHARITABLE GIVING ACT OF 2003,"
SCHEDULED FOR MARKUP BY THE COMMITTEE ON WAYS AND MEANS ON SEPTEMBER 9, 2003

Fiscal Years 2004 - 2013

[Millions of Dollars]

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
Charitable Giving Incentive Provisions													
1. Provide charitable contribution deduction for non-itemizers with cash contributions in excess of \$250 for individuals and \$500 for joint returns; cap on deduction of \$250 for individuals and \$500 for joint returns	tyba 12/31/03 & tybb 1/1/06	-214	-1,431	-1,244	---	---	---	---	---	---	---	-2,889	-2,889
2. Allow tax-free distributions from IRAs for charitable purposes for individuals age 70 1/2 and above, apply to both direct gifts and split-interest gifts; modify return requirements and penalties for certain trusts.....	dma 12/31/03 & rf tyba 12/31/03	-97	-204	-236	-256	-242	-229	-246	-350	-449	-470	-1,036	-2,780
3. Raise the cap on corporate charitable contributions from 10% to: 11% in 2004, 12% in 2005, 13% in 2006, 14% in 2007, 15% in 2008 through 2011, and 20% in 2012 and thereafter	tyba 12/31/03	-40	-89	-118	-149	-156	-154	-160	-166	-222	-270	-553	-1,525
4. Extend and modify present-law 170(e)(3) enhanced deduction for food inventory to all businesses; limit non-C corporation taxpayers to corporate cap percentage of their taxable income [1].....	tyba 12/31/03	-30	-56	-60	-63	-66	-68	-70	-73	-77	-80	-275	-643
5. Reform of certain excise taxes related to private foundations:													
a. Replace 2% tax on net investment income with 1% tax	tyba 12/31/03	-144	-196	-218	-225	-230	-237	-244	-251	-260	-270	-1,012	-2,273
b. Modify definition of qualifying distributions to exclude certain administrative expenses and increase first tier of self-dealing tax [2].....	tyba 12/31/03	----- Negligible Revenue Effect -----											
6. Modify tax on unrelated business taxable income of charitable remainder trusts	tyba 12/31/03	-4	-4	-5	-5	-5	-5	-6	-6	-6	-6	-23	-52
7. Expand enhanced deduction allowed for scientific property used for research and for computer technology and equipment to assembled property; permanent extension of enhanced deduction for qualified computer contributions [1]	tyba 12/31/03	-67	-133	-142	-149	-156	-163	-171	-179	-187	-195	-647	-1,540
8. Adjustment to basis of S corporation stock for certain charitable contributions	tyba 12/31/03	-13	-29	-33	-37	-41	-45	-50	-55	-62	-68	-152	-433
9. Charitable organizations permitted to make collegiate housing and infrastructure grants.....	gma 12/31/03	-5	-12	-13	-14	-15	-15	-14	-13	-13	-13	-59	-127
10. Treat certain games of chance as a related business for UBIT purposes.....	gca 12/31/03	[3]	-1	-1	-1	-1	-1	-1	-1	-1	-1	-2	-6
11. Federal excise tax exemptions for blood collector organizations	1/1/04	-1	-1	-1	-1	-1	-1	-1	-1	-1	-2	-6	-13

Provision	Effective	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2004-08	2004-13
12. Extend nonrecognition period on certain capital gains realized by section 501(c)(7) organizations.....	[4]	-8	-11	-8	-7	-7	-7	-7	-7	-8	-8	-41	-78
13. One-year exemption of certain qualified 501(c)(3) bonds for nursing homes from Federal guarantee prohibitions.....	bia 12/31/03 & woyo DOE	[3]	-1	-1	-2	-2	-2	-2	-2	-2	-2	-7	-16
Total of Charitable Giving Incentive Provisions		-623	-2,168	-2,080	-909	-922	-927	-972	-1,104	-1,288	-1,385	-6,702	-12,375
Tax Reform and Improvements Relating to Charitable Organizations and Programs													
1. Suspension of tax-exempt status of terrorist organizations.....	dmbo/a DOE	----- <i>Negligible Revenue Effect</i> -----											
2. Clarify that the church tax inquiry procedures do not apply to contacts made by the IRS for the purpose of educating churches with respect to tax laws governing exempt organizations	DOE	----- <i>No Revenue Effect</i> -----											
3. Extension of declaratory judgment procedures to non-501(c)(3) tax-exempt organizations	[5]	----- <i>Negligible Revenue Effect</i> -----											
4. Exclusion from income of certain landowner incentives program payments.....	ara 12/31/03 in tyea sd	-2	-4	-4	-4	-4	-4	-4	-4	-4	-4	-18	-38
5. Modify tax treatment of certain payments to controlling exempt organizations	[6]	-28	-13	-13	-14	-15	-16	-17	-18	-20	-21	-84	-175
6. Elimination of separate limitation on grass-roots lobbying...	tyba 12/31/03	-1	-1	-1	-1	-1	-2	-2	-2	-2	-2	-6	-14
7. Pilot project for forest conservation activities.....	oia DOE ab 12/31/06	-5	-7	-6	-6	-6	-6	-6	-6	-6	-6	-31	-61
Total of Tax Reform and Improvements Relating to Charitable Organizations and Programs		-36	-25	-24	-25	-26	-28	-29	-30	-32	-33	-139	-288
Other Provisions													
1. Compassion Capital Fund [7] [8]	DOE	----- <i>No Revenue Effect</i> -----											
2. Expansion of assets for Independence Act demonstration spending program [7] [8]	effy 2004 through 2008	----- <i>No Revenue Effect</i> -----											
3. Maternity Group Homes [7] [8]	DOE	----- <i>No Revenue Effect</i> -----											
Total of Other Provisions		---	---	---	---	---	---	---	---	---	---	---	---
NET TOTAL		-659	-2,193	-2,104	-934	-948	-955	-1,001	-1,134	-1,320	-1,418	-6,841	-12,663

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding.

Legend for "Effective" column:

- ab = and before
- ara = amounts received after
- bia = bonds issued after
- dma = distributions made after
- dmbo/a = designations made before, on, or after

- DOE = date of enactment
- effy = effective for fiscal years
- gca = games conducted after
- gma = grants made after
- oia = obligations issued after

- rf = returns for
- sd = such date
- tyba = taxable years beginning after
- tybb = taxable years beginning before
- tyea = taxable years ending after
- woyo = within one year of

[1] Includes interaction with increase in corporate charitable contribution limit.

[2] Estimate is preliminary and subject to change upon receipt of new data.

[3] Loss of less than \$500,000.

[4] Sales for which the 3-year nonrecognition period had not expired as of January 1, 2001.

[5] Effective for pleadings filed with respect to determinations (or requests for determinations) made after the date of enactment.

[6] Effective for payments received or accrued after December 31, 2003, and extends grandfather rule to certain payments received or accrued before January 1, 2001.

[7] Estimate provided by the Congressional Budget Office.

[8] Proposal provides authorization for spending subject to appropriations.