Tax Administration Perspectives

H.R.1 provisions that will flow through to VT with normal conformity	IRC Section	FY26 *(Millions)*	FY27 *(Millions)*
Child and Dependent Care Tax Credit Expansion	21	0.00	-1.00
Full Expensing of Domestic R&E	174A	-2.27	-2.29
Amended Limitation on Business Interest Deduction	163(j)	-0.93	-1.10
More Generous Expensing of Depreciable Assets	179	-0.26	-0.58
Special Depreciation for Qualified Production Property	168(n)	-0.24	-3.51
International Tax Provisions (H.R.1 changes only)	250(a), 951A	2.16	2.50
Pro-Rata Share Rules	951, 951A	0.00	0.10
Charitable Deductions for Corporations	170(b)(2)(A), (d)(2)	0.00	0.14
Miscellaneous Business and Corporate Provisions		0.00	0.08
Total		**-1.54**	**-5.65**

Red = Worst for Tax to decouple from administratively