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CONTEMPORARY U.S. TAX POLICY

SECOND EDITION

C. EUGENE STEUERLE

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Operating Abroad Under Current U.S. Tax Rules and Economic Policies Practising Law Institute, 1965

Taxes in America Leonard E. Burman, Joel Slemrod, 2012-10-25 Despite their passion and fury contemporary Americans are remarkably clueless about how their tax system works But with heated debates over taxation now roiling Congress and the nation an understanding of our tax system is of vital importance Taxes in America What Everyone Needs to Know by preeminent tax scholars Leonard E Burman and Joel Slemrod offers a clear concise explanation of how our tax system works how it affects people and businesses and how it might be improved Accessibly written and organized in a clear question and answer format the book describes the intricacies of the modern tax system in an easy to grasp manner Burman and Slemrod begin with the basic definitions of taxes and then delve into more complicated and indeed contentious concerns They address such questions as how to recognize Fool's Gold

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The Corporate Income Tax System Mark P. Keightley, Molly F. Sherlock, 2012-10-22 Many economists and policymakers believe that the U S corporate tax system is in need of reform There is however disagreement over why the corporate tax system needs to be reformed and what specific policy measures should be included in a reform To assist policymakers in designing and evaluating corporate tax proposals this report 1 briefly reviews the current U S corporate tax system 2 discusses economic factors that may be considered in the corporate tax reform debate and 3 presents corporate tax reform policy options including a brief discussion of current corporate tax reform proposals The current U S corporate income tax system generally taxes corporate income at a rate of 35% This tax is applied to income earned domestically and abroad although taxes on certain income earned abroad can be deferred indefinitely if that income remains overseas The U S corporate tax system also contains a number of deductions exemptions deferrals and tax credits often referred to as tax expenditures Collectively these provisions reduce the effective tax rate paid by many U S corporations below the 35% statutory rate In 2011 the sum of all corporate tax expenditures was 158.8 billion The significance of the corporate tax as a federal revenue source has declined over time At its post WWII peak in 1952 the corporate tax generated 32.1% of all federal tax revenue In 2010 the corporate tax accounted for 8.9% of federal tax revenue The decline in corporate revenues is a combination of decreasing effective tax rates an increasing fraction of business activity that is being carried out by pass through entities particularly partnerships and S corporations which are not subject to the corporate tax and a decline in corporate sector profitability A particular aspect of the corporate tax system that receives substantial attention is the 35% statutory corporate tax rate Although the U S has the world's highest statutory corporate tax rate the U S effective corporate tax rate is similar to the Organization for Economic Co operation and Development OECD average Further the U S collects less in corporate tax revenue relative to Gross Domestic Production GDP 1.9% in 2009 than the average of other OECD countries 2.8% in 2009 This report discusses a number of economic considerations that may be made while evaluating various corporate tax reform proposals These might include analyses of the likely effect on households of certain reforms also known as incidence analysis Policymakers might also want to consider how certain corporate tax provisions contribute to the allocation of economic resources choosing policies that promote an efficient use of resources Other goals of corporate tax reform may include designing a system that is simple to comply with and administer while also promoting competitiveness of U S corporations Commonly discussed corporate tax reforms include policies that would broaden the tax base i.e. eliminate tax expenditures to finance reduced corporate tax rates Concerns that the U S corporate tax system inefficiently imposes a double tax on corporate income has led some to consider an integration of the corporate and individual tax systems The

treatment of pass through income business income not earned by C corporations has also received considerable attention in tax reform debates How the U S taxes income earned abroad and the possibility of moving to a territorial tax system have emerged as important issues Both the Obama Administration and the House Committee on Ways and Means Chairman David Camp have released tax reform proposals that would change the current tax treatment of U S multinationals

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