

**Table T22-0162R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**  
**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile, 2027 <sup>1</sup>**  
**Summary Table**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units with Tax Increase or Cut <sup>4</sup>				Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change (\$)	Average Federal Tax Rate <sup>6</sup>	
	With Tax Cut		With Tax Increase					Change (%) Points)	Under the Proposal
	Pct of Tax Units	Avg Tax Change (\$)	Pct of Tax Units	Avg Tax Change (\$)					
<b>Lowest Quintile</b>	62.9	-460	0.0	0	1.4	29.7	-290	-1.4	2.8
<b>Second Quintile</b>	93.9	-120	0.0	0	0.2	10.0	-110	-0.2	9.7
<b>Middle Quintile</b>	98.8	-110	0.0	0	0.1	8.4	-100	-0.1	15.1
<b>Fourth Quintile</b>	99.9	-180	0.0	0	0.1	11.8	-180	-0.1	18.8
<b>Top Quintile</b>	100.0	-720	0.0	0	0.2	38.9	-720	-0.1	26.7
<b>All</b>	88.5	-290	0.0	0	0.2	100.0	-250	-0.2	21.0
<b>Addendum</b>									
<b>80-90</b>	100.0	-310	0.0	0	0.2	8.7	-310	-0.1	21.8
<b>90-95</b>	100.0	-480	0.0	0	0.2	6.4	-480	-0.1	24.0
<b>95-99</b>	100.0	-900	0.0	0	0.2	9.2	-900	-0.1	27.4
<b>Top 1 Percent</b>	100.0	-5,800	0.0	0	0.3	14.5	-5,800	-0.2	32.4
<b>Top 0.1 Percent</b>	99.9	-28,410	0.0	0	0.3	7.3	-28,400	-0.2	32.7

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

Number of AMT Taxpayers (millions). Baseline: 7.7 Proposal: 7.7

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes 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. For a description of expanded cash income, see

<http://www.taxpolicycenter.org/TaxModel/income.cfm>

(3) 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 2022 dollars): 20% \$32,000; 40% \$62,700; 60% \$111,200; 80% \$201,400; 90% \$292,900; 95% \$420,100; 99% \$1,017,300; 99.9% \$4,731,900.

(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) 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.

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**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile, 2027 <sup>1</sup>**  
**Detail Table**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	62.9	0.0	1.4	29.7	-290	-33.3	-0.3	0.5	-1.4	2.8
Second Quintile	93.9	0.0	0.2	10.0	-110	-2.2	-0.1	4.0	-0.2	9.7
Middle Quintile	98.8	0.0	0.1	8.4	-100	-0.7	0.0	10.4	-0.1	15.1
Fourth Quintile	99.9	0.0	0.1	11.8	-180	-0.6	0.1	18.5	-0.1	18.8
Top Quintile	100.0	0.0	0.2	38.9	-720	-0.5	0.2	66.3	-0.1	26.7
All	88.5	0.0	0.2	100.0	-250	-0.9	0.0	100.0	-0.2	21.0
<b>Addendum</b>										
80-90	100.0	0.0	0.2	8.7	-310	-0.5	0.1	14.7	-0.1	21.8
90-95	100.0	0.0	0.2	6.4	-480	-0.5	0.0	11.2	-0.1	24.0
95-99	100.0	0.0	0.2	9.2	-900	-0.5	0.1	16.8	-0.1	27.4
Top 1 Percent	100.0	0.0	0.3	14.5	-5,800	-0.5	0.1	23.6	-0.2	32.4
Top 0.1 Percent	99.9	0.0	0.3	7.3	-28,400	-0.6	0.0	10.7	-0.2	32.7

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile, 2027 <sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	48,800	26.1	20,930	4.0	860	0.8	20,070	4.9	4.1	
Second Quintile	41,530	22.2	52,080	8.6	5,150	4.0	46,920	9.8	9.9	
Middle Quintile	38,420	20.6	95,620	14.5	14,530	10.4	81,100	15.7	15.2	
Fourth Quintile	31,000	16.6	168,890	20.7	31,900	18.5	136,990	21.3	18.9	
Top Quintile	25,520	13.7	515,990	52.1	138,480	66.0	377,510	48.4	26.8	
All	#####	100.0	135,260	100.0	28,660	100.0	106,600	100.0	21.2	
<b>Addendum</b>										
80-90	13,090	7.0	272,880	14.1	59,720	14.6	213,150	14.0	21.9	
90-95	6,380	3.4	388,340	9.8	93,720	11.2	294,620	9.4	24.1	
95-99	4,870	2.6	667,320	12.9	183,960	16.7	483,370	11.8	27.6	
Top 1 Percent	1,180	0.6	3,272,780	15.3	1,064,530	23.5	2,208,250	13.1	32.5	
Top 0.1 Percent	120	0.1	14,341,850	6.9	4,714,940	10.7	9,626,900	5.8	32.9	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

Number of AMT Taxpayers (millions). Baseline: 7.7 Proposal: 7.7

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

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(2) Includes 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. For a description of expanded cash income, see

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(3) 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 2022 dollars): 20% \$32,000; 40% \$62,700; 60% \$111,200; 80% \$201,400; 90% \$292,900; 95% \$420,100; 99% \$1,017,300; 99.9% \$4,731,900.

(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(7) 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.

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**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**  
**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile Adjusted for Family Size, 2027 <sup>1</sup>**  
**Detail Table**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	61.2	0.0	1.5	25.3	-290	-92.1	-0.2	0.0	-1.5	0.1
Second Quintile	88.3	0.0	0.4	12.8	-150	-3.7	-0.1	3.0	-0.3	8.5
Middle Quintile	98.4	0.0	0.1	8.0	-100	-0.8	0.0	8.5	-0.1	13.8
Fourth Quintile	99.8	0.0	0.1	11.3	-150	-0.6	0.1	17.7	-0.1	18.3
Top Quintile	100.0	0.0	0.2	41.5	-610	-0.5	0.3	70.5	-0.1	26.4
All	88.5	0.0	0.2	100.0	-250	-0.9	0.0	100.0	-0.2	21.0
<b>Addendum</b>										
80-90	99.9	0.0	0.1	9.2	-260	-0.5	0.1	15.6	-0.1	21.5
90-95	100.0	0.0	0.2	7.0	-410	-0.5	0.1	12.2	-0.1	23.7
95-99	100.0	0.0	0.2	10.1	-770	-0.5	0.1	18.1	-0.1	26.9
Top 1 Percent	100.0	0.0	0.3	15.2	-4,980	-0.6	0.1	24.7	-0.2	32.2
Top 0.1 Percent	99.9	0.0	0.3	7.6	-24,810	-0.6	0.0	11.2	-0.2	32.7

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile Adjusted for Family Size, 2027 <sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	40,760	21.8	19,880	3.2	320	0.2	19,560	4.0	1.6	
Second Quintile	39,210	21.0	46,850	7.3	4,150	3.0	42,700	8.4	8.9	
Middle Quintile	38,230	20.5	85,630	13.0	11,880	8.5	73,740	14.2	13.9	
Fourth Quintile	34,810	18.6	147,590	20.3	27,150	17.7	120,450	21.1	18.4	
Top Quintile	32,240	17.3	440,380	56.2	116,650	70.3	323,740	52.4	26.5	
All	#####	#####	135,260	100.0	28,660	100.0	106,600	100.0	21.2	
<b>Addendum</b>										
80-90	16,450	8.8	233,500	15.2	50,530	15.5	182,970	15.1	21.6	
90-95	8,120	4.4	335,170	10.8	79,900	12.1	255,260	10.4	23.8	
95-99	6,230	3.3	573,070	14.1	155,100	18.0	417,970	13.1	27.1	
Top 1 Percent	1,440	0.8	2,817,250	16.1	910,860	24.6	1,906,390	13.8	32.3	
Top 0.1 Percent	150	0.1	#####	7.2	4,110,460	11.2	8,403,510	6.1	32.9	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

Number of AMT Taxpayers (millions). Baseline: 7.7 Proposal: 7.7

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

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(3) 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 incomes used are adjusted for family size by dividing by the square root of the number of people in the tax unit. The resulting percentile breaks are (in 2022 dollars): 20% \$22,800; 40% \$44,000; 60% \$74,900; 80% \$124,000; 90% \$179,700; 95% \$252,500; 99% \$594,900; 99.9% \$2,685,000.

(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

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**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile Adjusted for Family Size, 2027<sup>1</sup>**  
**Detail Table - Single Tax Units**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	53.4	0.0	2.0	41.3	-310	-40.2	-0.6	0.9	-1.9	2.9
Second Quintile	86.4	0.0	0.6	21.4	-190	-5.4	-0.2	5.7	-0.5	9.1
Middle Quintile	98.2	0.0	0.2	8.3	-80	-0.9	0.1	14.2	-0.1	14.4
Fourth Quintile	99.5	0.0	0.1	8.5	-120	-0.6	0.2	22.8	-0.1	19.3
Top Quintile	99.9	0.0	0.2	19.4	-400	-0.5	0.5	56.2	-0.1	26.8
All	82.8	0.0	0.4	100.0	-210	-1.5	0.0	100.0	-0.3	19.2
<b>Addendum</b>										
80-90	99.8	0.0	0.2	5.2	-190	-0.5	0.2	15.5	-0.1	22.7
90-95	100.0	0.0	0.2	3.6	-310	-0.5	0.1	10.3	-0.1	24.5
95-99	100.0	0.0	0.2	4.7	-550	-0.5	0.1	13.9	-0.1	27.5
Top 1 Percent	99.9	0.0	0.3	6.0	-3,470	-0.5	0.2	16.5	-0.2	33.7
Top 0.1 Percent	99.8	0.0	0.3	3.1	-18,280	-0.6	0.1	7.7	-0.2	34.7

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile Adjusted for Family Size, 2027<sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	26,280	28.3	16,020	6.1	770	1.5	15,250	7.2	4.8	
Second Quintile	21,950	23.7	37,440	11.9	3,600	5.9	33,840	13.4	9.6	
Middle Quintile	19,540	21.1	66,430	18.8	9,680	14.1	56,760	20.0	14.6	
Fourth Quintile	14,420	15.6	108,220	22.7	21,000	22.6	87,230	22.7	19.4	
Top Quintile	9,710	10.5	285,620	40.3	76,790	55.6	208,830	36.5	26.9	
All	92,760	100.0	74,280	100.0	14,450	100.0	59,830	100.0	19.5	
<b>Addendum</b>										
80-90	5,390	5.8	167,490	13.1	38,140	15.3	129,350	12.6	22.8	
90-95	2,300	2.5	241,320	8.1	59,400	10.2	181,920	7.6	24.6	
95-99	1,680	1.8	398,850	9.7	110,090	13.8	288,760	8.7	27.6	
Top 1 Percent	340	0.4	1,903,810	9.4	644,550	16.3	1,259,260	7.7	33.9	
Top 0.1 Percent	30	0.0	8,701,010	4.2	3,039,010	7.6	5,662,000	3.4	34.9	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

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(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

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(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(7) 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.

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**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile Adjusted for Family Size, 2027<sup>1</sup>**  
**Detail Table - Married Tax Units Filing Jointly**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	57.0	0.0	1.3	9.5	-330	-61.7	-0.1	0.0	-1.2	0.8
Second Quintile	82.5	0.0	0.3	5.5	-140	-3.3	0.0	1.1	-0.2	7.0
Middle Quintile	98.1	0.0	0.1	6.8	-130	-0.9	0.0	5.0	-0.1	12.6
Fourth Quintile	100.0	0.0	0.1	13.6	-190	-0.6	0.0	14.9	-0.1	17.5
Top Quintile	100.0	0.0	0.2	63.4	-710	-0.5	0.1	78.7	-0.1	26.2
All	92.8	0.0	0.2	100.0	-350	-0.7	0.0	100.0	-0.2	22.5
<b>Addendum</b>										
80-90	100.0	0.0	0.1	13.2	-310	-0.5	0.0	16.1	-0.1	21.0
90-95	100.0	0.0	0.2	10.6	-460	-0.5	0.0	13.4	-0.1	23.5
95-99	100.0	0.0	0.2	16.0	-870	-0.5	0.0	20.9	-0.1	26.8
Top 1 Percent	100.0	0.0	0.3	23.6	-5,350	-0.5	0.0	28.3	-0.2	32.0
Top 0.1 Percent	100.0	0.0	0.3	11.3	-26,150	-0.6	0.0	12.3	-0.2	32.4

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile Adjusted for Family Size, 2027<sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	6,630	10.2	26,790	1.1	540	0.1	26,250	1.4	2.0	
Second Quintile	8,810	13.5	61,160	3.4	4,390	1.1	56,770	4.1	7.2	
Middle Quintile	12,470	19.1	111,400	8.9	14,180	5.0	97,220	10.0	12.7	
Fourth Quintile	16,510	25.3	182,710	19.2	32,090	14.9	150,620	20.5	17.6	
Top Quintile	20,440	31.3	517,800	67.4	136,410	78.6	381,400	64.2	26.3	
All	65,350	100.0	240,210	100.0	54,300	100.0	185,910	100.0	22.6	
<b>Addendum</b>										
80-90	9,900	15.2	272,320	17.2	57,520	16.1	214,800	17.5	21.1	
90-95	5,280	8.1	381,720	12.8	90,080	13.4	291,640	12.7	23.6	
95-99	4,250	6.5	648,980	17.6	174,630	20.9	474,350	16.6	26.9	
Top 1 Percent	1,020	1.6	3,067,730	19.9	985,780	28.2	2,081,940	17.4	32.1	
Top 0.1 Percent	100	0.2	13,483,130	8.5	4,397,290	12.3	9,085,840	7.4	32.6	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes 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. For a description of expanded cash income, see

<http://www.taxpolicycenter.org/TaxModel/income.cfm>

(3) 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 incomes used are adjusted for family size by dividing by the square root of the number of people in the tax unit. The resulting percentile breaks are (in 2022 dollars): 20% \$22,800; 40% \$44,000; 60% \$74,900; 80% \$124,000; 90% \$179,700; 95% \$252,500; 99% \$594,900; 99.9% \$2,685,000.

(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(7) 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.

**Table T22-0162R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**  
**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile Adjusted for Family Size, 2027<sup>1</sup>**  
**Detail Table - Head of Household Tax Units**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	93.1	0.0	0.7	44.0	-210	13.2	-0.6	-4.6	-0.8	-6.7
Second Quintile	99.7	0.0	0.1	14.0	-70	-1.3	0.0	12.9	-0.1	8.8
Middle Quintile	99.8	0.0	0.1	13.6	-100	-0.7	0.1	24.8	-0.1	14.5
Fourth Quintile	100.0	0.0	0.1	12.1	-160	-0.5	0.2	29.0	-0.1	19.7
Top Quintile	99.7	0.0	0.2	15.6	-480	-0.5	0.3	37.9	-0.1	25.6
All	97.7	0.0	0.2	100.0	-150	-1.2	0.0	100.0	-0.2	14.6
<b>Addendum</b>										
80-90	99.6	0.0	0.1	5.0	-250	-0.5	0.1	12.7	-0.1	22.6
90-95	99.9	0.0	0.2	3.0	-360	-0.5	0.1	7.1	-0.1	22.8
95-99	100.0	0.0	0.2	2.3	-670	-0.5	0.1	6.1	-0.1	26.7
Top 1 Percent	99.9	0.0	0.3	5.3	-5,730	-0.5	0.1	12.0	-0.2	31.5
Top 0.1 Percent	100.0	0.0	0.3	3.4	-37,990	-0.6	0.0	7.0	-0.2	32.1

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile Adjusted for Family Size, 2027<sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	7,320	30.9	27,660	10.1	-1,620	-4.0	29,280	12.6	-5.9	
Second Quintile	7,380	31.2	58,270	21.5	5,190	13.0	53,090	23.0	8.9	
Middle Quintile	5,020	21.2	99,590	25.0	14,520	24.7	85,070	25.1	14.6	
Fourth Quintile	2,750	11.6	156,150	21.5	30,900	28.8	125,250	20.3	19.8	
Top Quintile	1,150	4.9	375,610	21.7	96,480	37.6	279,120	18.9	25.7	
All	23,690	100.0	84,320	100.0	12,490	100.0	71,830	100.0	14.8	
<b>Addendum</b>										
80-90	700	3.0	234,460	8.2	53,240	12.6	181,220	7.5	22.7	
90-95	300	1.3	306,190	4.5	70,140	7.0	236,050	4.1	22.9	
95-99	120	0.5	548,920	3.4	147,260	6.1	401,660	2.9	26.8	
Top 1 Percent	30	0.1	3,358,250	5.6	1,064,420	11.9	2,293,820	4.5	31.7	
Top 0.1 Percent	*	0.0	19,906,530	3.2	6,421,440	6.9	13,485,080	2.5	32.3	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes 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. For a description of expanded cash income, see

<http://www.taxpolicycenter.org/TaxModel/income.cfm>

(3) 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 incomes used are adjusted for family size by dividing by the square root of the number of people in the tax unit. The resulting percentile breaks are (in 2022 dollars): 20% \$22,800; 40% \$44,000; 60% \$74,900; 80% \$124,000; 90% \$179,700; 95% \$252,500; 99% \$594,900; 99.9% \$2,685,000.

(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(7) 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.

**Table T22-0162R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**  
**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile Adjusted for Family Size, 2027 <sup>1</sup>**  
**Detail Table - Tax Units with Children**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	95.0	0.0	0.9	20.7	-280	19.7	-0.2	-0.9	-1.0	-5.9
Second Quintile	99.8	0.0	0.2	6.4	-90	-1.4	0.0	3.0	-0.1	9.3
Middle Quintile	99.9	0.0	0.1	7.8	-120	-0.7	0.0	8.1	-0.1	15.2
Fourth Quintile	100.0	0.0	0.1	13.4	-200	-0.5	0.0	18.0	-0.1	20.0
Top Quintile	100.0	0.0	0.2	50.5	-800	-0.5	0.1	71.6	-0.1	27.7
All	98.9	0.0	0.2	100.0	-290	-0.7	0.0	100.0	-0.2	22.4
<b>Addendum</b>										
80-90	99.9	0.0	0.1	10.7	-340	-0.5	0.0	15.4	-0.1	22.9
90-95	100.0	0.0	0.2	8.0	-520	-0.5	0.0	11.7	-0.1	25.3
95-99	100.0	0.0	0.2	12.1	-960	-0.4	0.0	18.5	-0.1	28.5
Top 1 Percent	100.0	0.0	0.3	19.7	-5,980	-0.5	0.0	26.0	-0.2	32.6
Top 0.1 Percent	100.0	0.0	0.3	9.4	-29,570	-0.6	0.0	11.0	-0.2	32.5

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile Adjusted for Family Size, 2027 <sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	11,100	21.5	28,590	3.2	-1,420	-0.7	30,000	4.4	-5.0	
Second Quintile	11,190	21.6	63,120	7.2	5,940	3.0	57,170	8.4	9.4	
Middle Quintile	9,930	19.2	117,720	11.9	18,020	8.1	99,700	13.0	15.3	
Fourth Quintile	9,820	19.0	202,510	20.2	40,640	18.0	161,870	20.8	20.1	
Top Quintile	9,470	18.3	601,010	57.7	167,550	71.5	433,460	53.7	27.9	
All	51,730	#####	190,630	100.0	42,910	100.0	147,710	100.0	22.5	
<b>Addendum</b>										
80-90	4,780	9.2	310,130	15.0	71,430	15.4	238,700	14.9	23.0	
90-95	2,310	4.5	441,940	10.4	112,430	11.7	329,510	10.0	25.4	
95-99	1,880	3.6	760,220	14.5	217,840	18.4	542,380	13.3	28.7	
Top 1 Percent	490	1.0	3,562,930	17.8	1,167,080	25.9	2,395,850	15.5	32.8	
Top 0.1 Percent	50	0.1	#####	7.5	5,122,990	11.0	#####	6.6	32.7	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

Note: Tax units with children are those claiming an exemption for children at home or away from home or with children qualifying for the Child Tax Credit or EITC.

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

<http://www.taxpolicycenter.org/taxtopics/Baseline-Definitions.cfm>

(2) Includes 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. For a description of expanded cash income, see

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(3) 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 incomes used are adjusted for family size by dividing by the square root of the number of people in the tax unit. The resulting percentile breaks are (in 2022 dollars): 20% \$22,800; 40% \$44,000; 60% \$74,900; 80% \$124,000; 90% \$179,700; 95% \$252,500; 99% \$594,900; 99.9% \$2,685,000.

(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(7) 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.

**Table T22-0162R**  
**Modify Certain Business Provisions Enacted by the 2017 Tax Act (TCJA), Make the Child Tax Credit (CTC) Fully Refundable, and**  
**Extend Expansion of EITC for Workers without Qualifying Children Enacted by American Rescue Plan (ARP)**  
**Baseline: Current Law**  
**Distribution of Federal Tax Change by Expanded Cash Income Percentile Adjusted for Family Size, 2027 <sup>1</sup>**  
**Detail Table - Elderly Tax Units**

Expanded Cash Income Percentile <sup>2,3</sup>	Percent of Tax Units <sup>4</sup>		Percent Change in After-Tax Income <sup>5</sup>	Share of Total Federal Tax Change	Average Federal Tax Change		Share of Federal Taxes		Average Federal Tax Rate <sup>7</sup>	
	With Tax Cut	With Tax Increase			Dollars	Percent <sup>6</sup>	Change (% Points)	Under the Proposal	Change (% Points)	Under the Proposal
Lowest Quintile	21.8	0.0	0.4	6.8	-70	-29.6	-0.1	0.2	-0.4	0.9
Second Quintile	73.3	0.0	0.3	16.8	-140	-9.9	-0.2	1.6	-0.3	2.9
Middle Quintile	96.6	0.0	0.1	12.3	-110	-1.7	-0.1	7.5	-0.1	7.8
Fourth Quintile	99.6	0.0	0.1	13.7	-160	-0.9	0.0	15.2	-0.1	12.6
Top Quintile	100.0	0.0	0.2	48.7	-710	-0.7	0.3	74.8	-0.2	24.4
All	77.3	0.0	0.2	100.0	-200	-1.0	0.0	100.0	-0.2	16.7
<b>Addendum</b>										
80-90	100.0	0.0	0.2	10.1	-280	-0.8	0.0	13.3	-0.1	16.9
90-95	100.0	0.0	0.2	7.2	-450	-0.8	0.0	9.9	-0.2	19.7
95-99	100.0	0.0	0.2	11.1	-850	-0.7	0.1	17.5	-0.2	24.7
Top 1 Percent	100.0	0.0	0.3	20.4	-5,740	-0.6	0.1	34.0	-0.2	32.0
Top 0.1 Percent	100.0	0.0	0.3	11.4	-25,320	-0.7	0.1	18.1	-0.2	32.7

**Baseline Distribution of Income and Federal Taxes**  
**by Expanded Cash Income Percentile Adjusted for Family Size, 2027 <sup>1</sup>**

Expanded Cash Income Percentile <sup>2,3</sup>	Tax Units		Pre-Tax Income		Federal Tax Burden		After-Tax Income <sup>5</sup>		Average Federal Tax Rate <sup>7</sup>	
	Number (thousands)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total	Average (dollars)	Percent of Total		
Lowest Quintile	9,980	19.0	19,780	3.3	250	0.2	19,540	3.9	1.2	
Second Quintile	13,190	25.1	42,950	9.3	1,370	1.8	41,590	10.9	3.2	
Middle Quintile	12,340	23.5	78,930	16.0	6,220	7.5	72,700	17.8	7.9	
Fourth Quintile	9,190	17.5	133,790	20.2	16,950	15.2	116,840	21.2	12.7	
Top Quintile	7,240	13.8	429,030	51.1	105,310	74.6	323,720	46.4	24.6	
All	52,600	#####	115,550	100.0	19,440	100.0	96,110	100.0	16.8	
<b>Addendum</b>										
80-90	3,800	7.2	210,480	13.2	35,830	13.3	174,660	13.1	17.0	
90-95	1,690	3.2	302,130	8.4	59,910	9.9	242,220	8.1	19.8	
95-99	1,380	2.6	521,830	11.8	129,670	17.5	392,160	10.7	24.9	
Top 1 Percent	380	0.7	2,871,210	17.7	923,420	33.9	1,947,790	14.5	32.2	
Top 0.1 Percent	50	0.1	#####	9.2	3,880,640	18.0	7,925,190	7.4	32.9	

Source: Urban-Brookings Tax Policy Center Microsimulation Model (version 0722-2).

\* Non-zero value rounded to zero; \*\* Insufficient data

Note: Elderly tax units are those with either head or spouse (if filing jointly) age 65 or older.

(1) Calendar year. Baseline is the law currently in place as of December 4, 2022. Proposal would: (a) make the CTC fully refundable regardless of earned income or individual income tax liability; (b) increase the phase-in and phase-out rates of the EITC for workers without qualifying children to 15.3 percent; increase the end of the phase-in range to \$9,820, indexed for inflation after 2021; increase the start of the phase-out range to \$11,610 (\$17,550 for married couples filing jointly), indexed for inflation after 2021; and modify age requirements; (c) repeal amortization of research and experimental (R&E) expenditures; (d) extend limitation of interest deductions to 30 percent of EBITDA; and (e) make 100 percent bonus depreciation permanent.

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(4) Includes tax units with a change in federal tax burden of \$10 or more in absolute value.

(5) 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.

(6) For income categories for which the baseline tax burden is negative, a positive percent change in average federal tax indicates a net increase in federal subsidies, and a negative percent change indicates a net decrease in federal subsidies.

(7) 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.