Contents

Defining Tax Expenditures
2:1 Christopher Heady, “Tax Expenditures: Definitional and Policy Issues”
3:1 Paul R. McDaniel, “The Staff of the Joint Committee on Taxation Revision of Tax Expenditure Classification Methodology: What Is To Be Made of a Change That Makes No Changes?”

Distributional Effects of Tax Expenditures
4:1 Eric J. Toder, Benjamin H. Harris, and Katherine Lim, “Distributional Effects of Tax Expenditures in the United States”
5:1 Thaddeus Hwong, “The Distributional Effects of Making Personal Income Tax Credits Refundable”

Tax Expenditures and the Political Process
7:1 Christopher Howard, “The Politics of Tax Expenditures in Wealthy Democracies”

Tax Expenditures and the Environment
8:1 David G. Duff and E. Ian Wiebe, “Tax Expenditures To Limit the Growth of Carbon Emissions in Canada: Identification and Evaluation”

Tax Expenditures and Housing
11:1 Miranda Stewart, “Housing Tax Expenditures in Australia: Rethinking Benchmarks and Policy Goals”

Health Tax Expenditures
12:1 Tamara Larre, “The Children’s Fitness Tax Credit: Right Message, Wrong Policy Instrument”

Retirement Savings and Tax Expenditures
14:1 Jinyan Li, “Tax Treatment of Retirement Savings Plans: Past, Present, and Future”
## Detailed Contents

### DEFINING TAX EXPENDITURES

**Tax Expenditure Analysis: State of the Art, Neil Brooks, Jinyan Li, and Lisa Philipps**

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overview</td>
<td>1:1</td>
</tr>
<tr>
<td>Defining Tax Expenditures</td>
<td>1:2</td>
</tr>
<tr>
<td>Distributional Effects of Tax Expenditures</td>
<td>1:5</td>
</tr>
<tr>
<td>Tax Expenditures and the Political Process</td>
<td>1:7</td>
</tr>
<tr>
<td>Tax Expenditures and the Environment</td>
<td>1:10</td>
</tr>
<tr>
<td>Tax Expenditures and Housing</td>
<td>1:14</td>
</tr>
<tr>
<td>Health Tax Expenditures</td>
<td>1:17</td>
</tr>
<tr>
<td>Retirement Savings and Tax Expenditures</td>
<td>1:19</td>
</tr>
<tr>
<td>Conclusion</td>
<td>1:22</td>
</tr>
<tr>
<td>Notes</td>
<td>1:23</td>
</tr>
</tbody>
</table>

### Tax Expenditures: Definitional and Policy Issues, Christopher Heady

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abstract</td>
<td>2:1</td>
</tr>
<tr>
<td>Introduction</td>
<td>2:2</td>
</tr>
<tr>
<td>The Definition of Tax Expenditures</td>
<td>2:2</td>
</tr>
<tr>
<td>The Case Against Tax Expenditures</td>
<td>2:6</td>
</tr>
<tr>
<td>A Closer Examination of Tax Expenditures</td>
<td>2:9</td>
</tr>
<tr>
<td>Technical Tax Expenditures</td>
<td>2:10</td>
</tr>
<tr>
<td>Tax Expenditures That Have the Same Purpose as Social Benefits</td>
<td>2:10</td>
</tr>
<tr>
<td>Preferential Tax Treatment of Social Benefits</td>
<td>2:11</td>
</tr>
<tr>
<td>Tax Expenditures That Are Designed To Modify Behaviour</td>
<td>2:12</td>
</tr>
<tr>
<td>The Distinction Between “General” and “Narrow” Tax Expenditures</td>
<td>2:14</td>
</tr>
<tr>
<td>Conclusions</td>
<td>2:15</td>
</tr>
<tr>
<td>Notes</td>
<td>2:15</td>
</tr>
</tbody>
</table>

### The Staff of the Joint Committee on Taxation Revision of Tax Expenditure Classification Methodology: What Is To Be Made of a Change That Makes No Changes? Paul R. McDaniel

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abstract</td>
<td>3:1</td>
</tr>
<tr>
<td>Introduction</td>
<td>3:2</td>
</tr>
<tr>
<td>Methodology Historically Used To Classify Code Provisions</td>
<td>3:2</td>
</tr>
<tr>
<td>The Tax Base</td>
<td>3:2</td>
</tr>
<tr>
<td>Tax Rates</td>
<td>3:3</td>
</tr>
<tr>
<td>The Taxable Unit</td>
<td>3:3</td>
</tr>
<tr>
<td>Accounting Rules</td>
<td>3:3</td>
</tr>
<tr>
<td>International Tax System</td>
<td>3:4</td>
</tr>
<tr>
<td>Tax Administration</td>
<td>3:4</td>
</tr>
<tr>
<td>Methodology Adopted by JCT Staff</td>
<td>3:4</td>
</tr>
<tr>
<td>Tax Subsidies</td>
<td>3:4</td>
</tr>
<tr>
<td>Tax-Induced Structural Distortions</td>
<td>3:5</td>
</tr>
<tr>
<td>The 2008 Tax Expenditure Estimates</td>
<td>3:5</td>
</tr>
</tbody>
</table>
CRITIQUE OF THE REASONS FOR THE JCT STAFF’S CHANGES .............................................. 3:6
Conclusions ......................................................................................................................... 3:10
Notes ................................................................................................................................... 3:11

DISTRIBUTIONAL EFFECTS OF TAX EXPENDITURES

Distributional Effects of Tax Expenditures in the United States,
Eric J. Toder, Benjamin H. Harris, and Katherine Lim ......................................................... 4:1
Abstract ................................................................................................................................. 4:1
Introduction ............................................................................................................................ 4:2
Review of Tax Expenditure Literature .................................................................................. 4:3
Issues in Measuring Distributional Effects ............................................................................. 4:6
  Definition of the Baseline .................................................................................................... 4:6
  Timing: Cash Flow Versus Present Value .......................................................................... 4:8
  Behavioural Responses ....................................................................................................... 4:8
  Tax Incidence ....................................................................................................................... 4:9
  Use of Additional Revenue ................................................................................................. 4:10
Methodology .......................................................................................................................... 4:11
Distributional Effects of Tax Expenditures for Owner-Occupied Housing ......................... 4:13
  Provisions Estimated ......................................................................................................... 4:13
  Effects of Eliminating the Tax Expenditures on After-Tax Distribution of Income ........ 4:14
  Effects of Using Alternative Offsets .................................................................................. 4:14
Distributional Effects of Tax Expenditures for Medical Care ............................................. 4:17
  Provisions Estimated ......................................................................................................... 4:17
  Effects of Eliminating the Tax Expenditures on After-Tax Distribution of Income .......... 4:19
  Effects Using Alternative Offsets ....................................................................................... 4:19
Distributional Effects of Tax Expenditures for Retirement Saving ....................................... 4:21
  Provisions Estimated ......................................................................................................... 4:22
  Components of the “Cash Flow” Tax Expenditure .......................................................... 4:22
  Eliminating Tax Expenditures for New Saving ................................................................. 4:23
  Effects of Eliminating the Tax Expenditures on After-Tax Distribution of Income .......... 4:24
  Effects Using Alternative Offsets ....................................................................................... 4:25
Conclusions ........................................................................................................................... 4:29
Appendix Distribution of Offsets per $100 Billion Returned to Taxpayers ......................... 4:30
Notes ...................................................................................................................................... 4:32

The Distributional Effects of Making Personal Income Tax Credits Refundable, Thaddeus Hwong ............................................................ 5:1
Abstract .................................................................................................................................. 5:1
Making Personal Income Tax Credits Refundable? ............................................................ 5:1
Using the SPSD/M To Estimate the Outcomes of Credit Conversions .............................. 5:3
Simulation Results ................................................................................................................ 5:4
  Overall Results .................................................................................................................. 5:5
  Individual .......................................................................................................................... 5:5
<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Family</td>
<td>5:6</td>
</tr>
<tr>
<td>Work</td>
<td>5:8</td>
</tr>
<tr>
<td>Education</td>
<td>5:8</td>
</tr>
<tr>
<td>Health</td>
<td>5:10</td>
</tr>
<tr>
<td>Old Age</td>
<td>5:11</td>
</tr>
<tr>
<td>Community</td>
<td>5:12</td>
</tr>
<tr>
<td>Implications of the Results</td>
<td>5:13</td>
</tr>
<tr>
<td>Future Research Directions</td>
<td>5:14</td>
</tr>
<tr>
<td>Notes</td>
<td>5:16</td>
</tr>
</tbody>
</table>

**TAX EXPENDITURES AND THE POLITICAL PROCESS**

*Capturing Contemporary “Democracy”: The Shortcomings of Australian Tax Expenditure Management and Their Ideological Foundations,* Mark Burton

**Abstract**

**Introduction**

Possible Explanations for Australia's Pathological Tax Expenditure Management

- Professional Governing Elite Acting Appropriately?
- Majority Rule
- Public Choice

The Role of Ideology in Propagating and Perpetuating Quiescence

Ideological Sources of Inertia

- Tying Tax Expenditures to Ideological Sacred Cows
- Constraining the Ideological Field
  - Economic Efficiency and the Great Vanishing Act—Bringing a Tax Expenditure Within the Normative Taxation System
  - Rewarding Entrepreneurship—The Protestant Ethic and Public Rewards for Private Risk Taking
  - Out of Sight, Out of Mind—Hobbling Distributive Justice
- Tax Expenditures Are Not “Real”: The Skeptical Critique of the Tax Expenditure Concept
- Surrey's Legacy—The Technical Remoteness of the Tax Expenditure Concept
- Making the Best of an Unjust System—The Official Discourse of Formal Justice, Ethics, and Tax Compliance
  - Tax Administration and the Rhetorical Separation of Formal Justice and Substantive Justice
  - The Rhetoric of the Apolitical Legislative Process—The Official Discourse of Bureaucratic Rationality

**Conclusion: Findings and Implications**

**Notes**

*The Politics of Tax Expenditures in Wealthy Democracies,* Christopher Howard

**Abstract**

**Introduction**

**Tax Breaks for Social Purposes**
# Detailed Contents

## Tax Expenditures and Housing

**Tax Expenditures and Policy: A Case Study of Housing Policy in Canada,**
*George Fallis* .................................................. 10:1

**Abstract** ................................................................. 10:1

**Introduction** ......................................................... 10:1

**Housing Tax Expenditures in Canada** ........................................ 10:2

**Critical Reflections on Canada's Tax Expenditure Reporting** ........... 10:6

**A Review of Canadian Housing Policy** .................................. 10:10

- **Period 1: 1945-1964** ........................................... 10:11
- **Period 2: 1964-1978** ........................................... 10:12
- **Period 3: 1978-1998** ........................................... 10:15
- **Period 4: 1998-2008** ........................................... 10:17

**A Revised Interpretation of Tax Expenditures in Canadian Housing Policy** ........................................ 10:19

**Lessons from the Case Study of Housing Policy** ....................... 10:23

**Notes** ................................................................. 10:24

**Housing Tax Expenditures in Australia: Rethinking Benchmarks and Policy Goals,**
*Miranda Stewart* .................................................... 11:1

**Abstract** ................................................................. 11:1

**Introduction** ......................................................... 11:1

**Housing in Australia** .................................................. 11:3

**Defining the Tax Expenditure Benchmark** .................................. 11:5

- **Income Tax** .......................................................... 11:8
  - **Home Ownership** ............................................. 11:8
  - **Rental Housing** ............................................... 11:10
  - **Consumption Tax and the GST** ............................... 11:12
  - **Land Tax** ..................................................... 11:15

**Housing Tax Reform** ................................................... 11:15

- **Home Ownership: Retaining the Status Quo** ......................... 11:16
- **Increasing Access to Home Ownership** ................................ 11:17
- **Taxing Rental Housing: Toward a “Dual Income Tax”?** ............... 11:19
- **Taxing Housing Wealth Through a Land Tax** ........................ 11:21

**Conclusion** .............................................................. 11:22

**Notes** ................................................................. 11:23

## Health Tax Expenditures

**The Children’s Fitness Tax Credit: Right Message,**
*Wrong Policy Instrument,*
*Tamara Larre* .......................................................... 12:1

**Abstract** ................................................................. 12:1

**Introduction** ......................................................... 12:1

**Targeting Physical Inactivity: Right Message** ............................. 12:3

**The Children’s Fitness Tax Credit: Wrong Policy Instrument** ........ 12:5

**Institutional Characteristics of the Income Tax System** ................ 12:5

**Evaluating the CFTC** .................................................. 12:6

- **The Amount Is Insufficient To Provide an Incentive Effect** ........ 12:8
- **The CFTC Is Not Sufficiently Targeted** ................................ 12:9
- **The Delayed Benefit Will Be Discounted** ................................ 12:10
- **A Financial Incentive May Not Be Effective** ........................... 12:11
Empirical Assessment of Outcomes Will Be Difficult
Self-Assessment May Lead to Lower Uptake and Higher Compliance Costs
Non-Filers Will Not Benefit
Restriction to Organized Programs Favours Better-Off Families
Conclusion
Notes

RETIREMENT SAVINGS AND TAX EXPENDITURES

Tax Expenditures as Part of Australia’s Retirement Income System: The Elevation from “Disguised” Expenditures to Architectural Pillars of the 21st Century, Kerrie Sadiq

Abstract
Introduction
Tax Expenditures in Australia: History and Context
Observations on Key Tax Expenditure Reviews and Findings
Current Tax Expenditure Reporting
The Retirement Income System
The Incremental Development of the “Three Pillars”
The Development of the Concessional Tax Regime
The Current Cost of Retirement Savings in a Tax Expenditure Framework
The Henry Tax Review: An Evaluation as Part of the Retirement Income System Architecture
A Spending Framework for Retirement Savings Concessions
Conclusion
Notes

Tax Treatment of Retirement Savings Plans: Past, Present, and Future, Jinyan Li

Abstract
Introduction
Original Intent
Assisting Companies with Occupational Pension Plans
Equalizing Tax-Assisted Savings Opportunities for the Employed and Self-Employed
Top-Up Public Pensions
Encouraging Retirement Savings
Technical Design
Registration
Benefiting Canadian Workers
Targeted Income Replacement Rate
Retirement Income Security
Tax Expenditure Analysis
Controversy About Characterization
Measuring the Cost of the Pension Tax Expenditures
Methodology
Trends
Magnitude
Beneficiaries of the Pension Tax Expenditures .................................................. 14:13
Canadians with Earned Income ............................................................................. 14:13
Proportion of Taxpayers with RPPs/RRSPs ............................................................. 14:14
Sensitivity to Income Levels .................................................................................. 14:15
Assessment ............................................................................................................. 14:16
Declining Coverage of RPPs, Especially DB Plans .................................................. 14:16
Top-Up for Higher Income Groups ......................................................................... 14:17
Effectiveness in Promoting Savings for Retirement ................................................. 14:18
The Future of the Pension Tax Expenditures ............................................................ 14:21
Foundation of Pillar 3 .............................................................................................. 14:21
Managing the Gaps in Coverage ............................................................................. 14:21
Institutional Limitations ......................................................................................... 14:22
Conclusions ............................................................................................................ 14:22
Notes ...................................................................................................................... 14:23