

April 2013

# TAX EXPENDITURES

## IRS Data Available for Evaluations Are Limited



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Accountability \* Integrity \* Reliability

Highlights of [GAO-13-479](#), a report to congressional requesters

## Why GAO Did This Study

By one measure, tax expenditures resulted in an estimated \$1 trillion of revenue forgone by the federal government in fiscal year 2011. GAO has recommended greater scrutiny of tax expenditures, as periodic reviews could help determine how well specific tax expenditures achieve their goals and how their benefits and costs compare to those of other programs with similar goals. To assist with this, GAO recently issued a guide ([GAO-13-167SP](#)) for evaluating the performance of tax expenditures. GAO was asked to identify data needed for evaluating tax expenditures and its availability. This report: (1) determines the information available from IRS for evaluating tax expenditures; and (2) compares, for a few case studies, the information identified by federal agencies for evaluating outlay programs with similar purposes to tax expenditures. To address these objectives, GAO analyzed 173 tax expenditures, and information from IRS tax forms, federal agency performance reports, and prior GAO reports.

## What GAO Recommends

GAO made no recommendations in this report. IRS provided technical comments that were incorporated as appropriate.

View [GAO-13-479](#). For more information, contact James R. White at (202) 512-9110 or [whitej@gao.gov](mailto:whitej@gao.gov).

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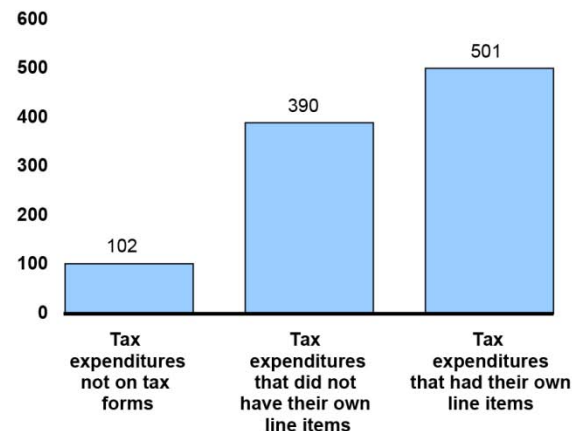
# TAX EXPENDITURES

## IRS Data Available for Evaluations Are Limited

### What GAO Found

Internal Revenue Service (IRS) data are not sufficient for identifying who claims a tax expenditure and how much they claim for \$492 billion or almost half the dollar value of all tax expenditures that GAO examined. Such basic data are not available at IRS for tax expenditures because they do not have their own line item on a tax form. This included \$102 billion of tax expenditures that were not on tax forms, such as the exclusion of interest on life insurance savings, and \$390 billion of tax expenditures that were on tax forms but did not have their own line items, such as the credit for holding clean renewable energy bonds which is aggregated with other credits on a single line item.

**Tax Expenditures on Tax Forms by Estimated Dollar Amount, Fiscal Year 2011**  
 Dollars in billions



Source: GAO analysis of IRS tax forms and Treasury tax expenditure amounts.

In four cases in which the Office of Management and Budget (OMB) identified outlay programs and comparable tax expenditure programs that shared similar purposes, the related agencies produced performance measures and goals only for the outlay programs and not for the comparable tax expenditures. For example, OMB identified the Alternative Technology Vehicle Credit as having a comparable purpose to the Department of Energy (DOE) Vehicle Technologies outlay program—both are intended to create more fuel efficient modes of transportation. DOE produced a performance measure and goal for the outlay program—petroleum consumption reduced by 570 million gallons per year by 2011—as required under the provisions of the Government Performance and Results Act of 1993 and the Government Performance and Results Act Modernization Act of 2010. However, DOE did not produce measures and goals for the comparable tax expenditure as neither act requires DOE or other federal agencies to do so. Although IRS is responsible for administering these tax expenditures, it is required by law, unless otherwise directed by Congress, to collect only data which are required for administration of the tax code. GAO has recommended that the agencies responsible for tax expenditures be identified and the lack of credible performance data be addressed.

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## Abbreviations

CAP	Cross-Agency Priority
CRS	Congressional Research Service
DOE	Department of Energy
DOL	Department of Labor
EZ	Empowerment Zone
GPRA	Government Performance and Results Act of 1993
GPRAMA	Government Performance and Results Act Modernization Act of 2010
HUD	Department of Housing and Urban Development
IRD	Indian reservation depreciation
IRS	Internal Revenue Service
OMB	Office of Management and Budget
SOI	Statistics of Income
Treasury	Department of the Treasury
WIA	Workforce Investment Act
WOTC	Work Opportunity Tax Credit

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United States Government Accountability Office  
Washington, DC 20548

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April 30, 2013

The Honorable John Lewis  
Ranking Member  
Committee on Ways and Means  
Subcommittee on Oversight  
United States House of Representatives

The Honorable Lloyd Doggett  
United States House of Representatives

Tax expenditures are special exemptions and exclusions from taxation, deductions, credits, deferrals of tax liability, and preferential tax rates that are exceptions from a “normal” tax. They represent a substantial federal commitment. An estimated \$1 trillion in revenue was forgone through tax expenditures in fiscal year 2011—an estimate produced by summing the Department of the Treasury’s (Treasury) estimates for each of the 173 tax expenditures reported in that year. As we have pointed out in our recently issued guide to evaluating tax expenditures, many tax expenditures are equivalent to spending through the tax code.<sup>1</sup> For example, some tax expenditure programs are intended, like some spending programs, to encourage economic development in disadvantaged areas, finance postsecondary education, and stimulate research and development. The revenue the federal government forgoes from tax expenditures reduces funds available for other federal activities, requires higher tax rates to raise any given amount of revenue, or increases the budget deficit. The Internal Revenue Service (IRS) is responsible for administering the tax laws, including those for tax expenditures. However, IRS is not required to collect or evaluate data other than those which are required for administration of the tax code unless it is legislatively mandated to collect additional information.

Since 1994, we have recommended greater scrutiny of tax expenditures, as periodic reviews could help determine how well specific tax expenditures work to achieve their goals and how their benefits and costs compare to those of spending and other programs with similar goals.

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<sup>1</sup>GAO, *Tax Expenditures: Background and Evaluation Criteria and Questions*, [GAO-13-167SP](#) (Washington, D.C.: Nov. 29, 2012).

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Our recently issued guide, cited above, provides a framework for evaluating the performance of tax expenditures. As requested, this report focuses on the availability of data needed to evaluate tax expenditures. Specifically, our objectives are to (1) determine the information available from IRS for evaluating tax expenditures; and (2) compare, for a few case studies, the information identified by federal agencies for evaluating outlay programs with similar purposes to tax expenditures.

To address the first objective, we identified 173 tax expenditures for fiscal year 2011 from Treasury's list of tax expenditures from the *Budget of the United States Government, Fiscal Year 2012*.<sup>2</sup> To determine the dollar amount of these tax expenditures, we used revised fiscal year 2011 estimates from the fiscal year 2013 budget. We then reviewed IRS tax returns, information returns, other tax forms, and publications for tax year 2011 to determine whether they had information on the tax expenditures that appeared on the Treasury list.<sup>3</sup> For those tax expenditures that had information, we reviewed IRS's Statistics of Income (SOI) documentation guide, *Proposed Tax Year 2010 Forms and Schedules*, the latest year available, to determine whether SOI collects this information from tax forms.<sup>4</sup> We also reviewed our prior reports to identify instances where IRS data available for evaluating tax expenditures were limited and the limitations were not remedied by data from other sources.

To address the second objective, we based our selection of case studies on the tax expenditures identified by agencies and the Office of Management and Budget (OMB) as contributing to crosscutting priority goals. We chose Department of Energy (DOE) and Department of Labor (DOL) outlay programs that we considered comparable to these tax expenditures for fiscal year 2011—the year most closely corresponding to our list of tax expenditures and estimates of their dollar value. We analyzed these reports for examples of information reported for the Weatherization, Vehicle Technologies, Renewable Energy, and the

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<sup>2</sup>Office of Management and Budget, *Analytical Perspectives, Budget of the United States Government, Fiscal Year 2012* (Washington, D.C.: 2011).

<sup>3</sup>For purposes of this report, we will refer to IRS tax returns, information returns, and other tax forms as "tax forms".

<sup>4</sup>SOI analyzes data from tax forms to study and report on such things as sources of income, exemptions, deductions, tax credits, and tax payments.

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Workforce Investment Act<sup>5</sup> (as it pertained to dislocated workers) outlay programs and used the performance evaluation criteria developed in a prior report to assess their usefulness for evaluations. Detailed information on our scope and methodology can be found in appendix I.

We conducted this performance audit from September 2012 through April 2013 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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## Background

Tax expenditures are provisions of the tax code that are viewed as exceptions to the “normal structure” of the individual and corporate income tax (i.e., exceptions to taxing income).<sup>6</sup> They take the form of exemptions, exclusions, deductions, credits, deferrals, and preferential tax rates; however, not all such provisions are tax expenditures. For example, some provisions that determine tax liability, such as business expense deductions, are not considered to be tax expenditures because costs of earning income are usually deducted in calculating taxable income for businesses. Generally, tax expenditures grant special tax relief for certain kinds of behavior by taxpayers or for taxpayers in special circumstances.<sup>7</sup> Holding tax rates constant, tax expenditures result in forgone tax revenue the government incurs by granting the relief.<sup>8</sup> Many

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<sup>5</sup>The Workforce Investment Act of 1998, Pub. L. No. 105-220, 112 Stat. 936 (Aug. 7, 1998).

<sup>6</sup>The concept of tax expenditures extends beyond the income tax. Tax expenditures also exist for other types of taxes such as excise and payroll taxes; however, this report considers only tax expenditures for the federal income tax system.

<sup>7</sup>While income tax expenditures are exceptions to taxing income, not all such exceptions are considered tax expenditures. Furthermore, the tax expenditures discussed in this report are for an income tax; different tax expenditures would apply in the case of a consumption tax. For details on the concept of tax expenditures and the different types of tax expenditures, see [GAO-13-167SP](#) and GAO, *Understanding the Tax Reform Debate: Background, Criteria, & Questions*, [GAO-05-1009SP](#) (Washington, D.C.: Sept. 1, 2005).

<sup>8</sup>Revenue loss estimates do not incorporate any behavioral responses and, thus, do not necessarily represent the exact amount of revenue that would be gained if a specific tax expenditure was repealed.

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of these provisions may, in effect, be viewed as spending programs channeled through the tax system.

Congress updated the statutory framework for performance management in the federal government, the Government Performance and Results Act of 1993 (GPRA), with the GPRA Modernization Act of 2010 (GPRAMA).<sup>9</sup> Both acts require agencies to set goals and measure and report the performance of their programs. GPRAMA introduced a more integrated and crosscutting approach to performance measurement that cuts across organizational boundaries. The act requires that OMB, in coordination with agencies, develop long-term crosscutting priority goals to improve performance and management of the government. OMB is to coordinate annually with agencies to develop a federal government performance plan which establishes performance indicators for achieving these goals. Moreover, GPRAMA requires that this plan identify the tax expenditures that contribute to each crosscutting priority goal. As we noted in a recent report,<sup>10</sup> sporadic progress has been made along these lines. OMB Circular A-11 guidance directs agencies to list tax expenditures among the various programs and activities that contribute to the subset of performance goals that are designated as agency priority goals.<sup>11</sup>

A performance evaluation of a tax expenditure program would use largely the same concepts, methods, and types of data as an evaluation of an outlay program. In prior reports, we have described in some detail how such program evaluations would be conducted to measure progress toward achieving the program's intended purpose.<sup>12</sup> Even if a tax

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<sup>9</sup>Government Performance and Results Act of 1993, Pub. L. No. 103-62, 107 Stat. 285 (Aug. 3, 1993). GPRA Modernization Act of 2010, Pub. L. No. 111-352, 124 Stat. 3866 (Jan. 4, 2011).

<sup>10</sup>GAO, *Managing for Results: GAO's Work Related to the Interim Crosscutting Priority Goals under the GPRA Modernization Act*, [GAO-12-620R](#) (Washington, D.C.: May 31, 2012).

<sup>11</sup>Another recent GAO report found that only one agency had identified tax expenditures that support an agency performance goal. See GAO, *Managing for Results: Agencies Should More Fully Develop Priority Goals under the GPRA Modernization Act*, [GAO-13-174](#) (Washington, D.C.: Apr. 19, 2013).

<sup>12</sup>See for example GAO, *Designing Evaluations: 2012 Revision*, [GAO-12-208G](#) (Washington, D.C.: Jan. 31, 2012) and *Executive Guide: Effectively Implementing the Government Performance and Results Act*, [GAO/GGD-96-118](#) (Washington, D.C.: June 1, 1996).



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expenditure is meeting its intended purpose, broader questions can be asked about its effects beyond that purpose. Specifically, the long standing criteria of fairness, economic efficiency, transparency, simplicity, and administrability can be used to evaluate whether a tax expenditure is good tax policy.<sup>13</sup>

Some agencies may be better positioned to collect tax expenditure information and make it available for analysis than others. As we said in our *Guide for Evaluating Tax Expenditures*, for a tax expenditure that is part of a crosscutting agency priority goal, the responsible agencies identified in the related performance plan may be the logical agencies responsible for evaluating the tax expenditure. Although IRS is the federal agency responsible for administering tax expenditures, it is not responsible for the program areas targeted by many tax expenditures. The information available at IRS is generally limited by the Paperwork Reduction Act to data used for tax administration, not for performance evaluation.<sup>14</sup>

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## Information for Almost \$500 Billion of Tax Expenditures Is Not Collected on Tax Forms

Of the 163 tax expenditures identified by Treasury for tax year 2011,<sup>15</sup> 102, or 63 percent, were not on a tax return, information return, or other tax form; or they were on these tax forms but did not have their own line item, as shown in table 1. For these tax expenditures, the tax forms do not capture information on who claimed the tax expenditures and how much they claimed. An example of a tax expenditure not on a tax form is the exclusion of interest on life insurance savings where the taxpayer is not asked to report the amount of the exclusion anywhere on a tax form, while an example of a tax expenditure without its own line item is the credit for holding clean renewable energy bonds where the credit is

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<sup>13</sup>See [GAO-13-167SP](#) and [GAO-05-1009SP](#).

<sup>14</sup>Pub. L. No. 104-13, §3506, 109 Stat.171-172 (May 22, 1995).

<sup>15</sup>We report our analysis for 163 of 173 tax expenditures identified by Treasury. We excluded 10 tax expenditures because either they were not in effect in 2011 or we believed the tax expenditure amounts, if identifiable, would not be complete. Of these, 5 were not in effect for tax year 2011; 3 only had part of the tax expenditure reported on a tax form, such as the Exclusion of Benefits and Allowances to Armed Forces Personnel where only the combat pay portion was reported on a Form W-2 (Wage and Tax Statement); and 2 had the reporting on the tax form as optional, such as Employer Plans on Form W-2.

aggregated with other credits on a single line item.<sup>16</sup> Nearly all deferrals or exclusions were either not on a tax form or did not have their own line item. For information on our classification by specific tax expenditure, see appendix II.

**Table 1: Tax Expenditures on Tax Forms by Type of Tax Expenditure, Tax Year 2011**

Type of tax expenditure	Number of tax expenditures not on a tax form	Number of tax expenditures on a tax form but did not have their own line item <sup>a</sup>	Number of tax expenditures on a tax form and had their own line item <sup>b</sup>	Totals	Percentage of tax expenditures that did not have their own line item
Credits	0	10	29	39	26
Deductions	0	10	15	25	40
Exemptions	0	3	4	7	43
Exclusions	23	27	8	58	86
Deferrals	4	19	1	24	96
Preferential tax rates	0	5	2	7	71
Multiple types <sup>c</sup>	0	1	2	3	33
<b>Totals</b>	<b>27</b>	<b>75</b>	<b>61</b>	<b>163</b>	<b>63</b>

Source: GAO analysis of Treasury tax expenditures and IRS tax forms.

<sup>a</sup>Some tax expenditures may be combined with other tax expenditures or similar transaction types that are not tax expenditures on the same line of a tax form.

<sup>b</sup>Some tax expenditures use multiple tax forms, multiple line items, or both to account for all parts of the tax expenditure. When multiple forms or line items were used, we considered the tax expenditure as having its own line item when all parts of the tax expenditure were on tax forms and had their own line items.

<sup>c</sup>A tax expenditure can include more than one type, as in the case of the adoption credit and exclusion.

If a tax expenditure has its own line item on a tax form, the IRS can identify the claimant and amount of the claim. These account for about half of the total tax expenditures. As shown in figure 1, these accounted for \$501 billion of the almost \$1 trillion of revenue estimated by Treasury in 2011 for the tax expenditures that we analyzed. The remaining \$492

<sup>16</sup>Another example of aggregation is the three tax expenditures dealing with the deductibility of different types of charitable contributions (education, health, and other contributions) which are reported on a single line item. Although charitable contributions are listed as one deduction under the tax code, they are broken out in the budget into three functional categories and are counted as three separate tax expenditures by Treasury.

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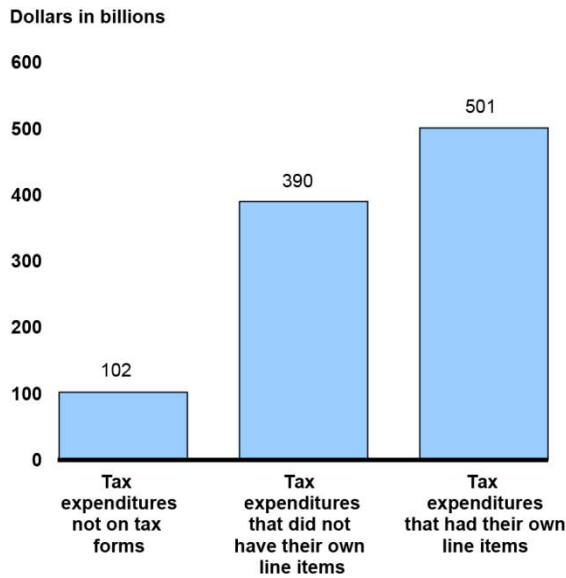
billion were not on tax forms or did not have their own line items.<sup>17</sup> Having such basic information about tax expenditures can facilitate certain kinds of analysis. Specifically, when a tax expenditure has its own line item, the claimant can be matched to his or her income which is also reported on the tax return. This linkage facilitates analyses of the distributional effects of a tax expenditure by showing tax expenditure use by income category.<sup>18</sup>

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<sup>17</sup>Estimates of the amount of revenue forgone for tax expenditures where IRS does not have information about who claims the tax expenditure and how much they claim require the use of data sources outside IRS such as the U.S. Census Bureau and the Bureau of Economic Analysis. In these cases, the amounts are inferred from economic aggregates and no attempt is made to determine the number of claimants and their characteristics, which makes these estimated total amounts of limited value for performance or effectiveness reviews.

<sup>18</sup>See GAO, *Energy Conservation and Climate Change: Factors to Consider in the Design of the Nonbusiness Energy Property Credit*, [GAO-12-318](#) (Washington, D.C.: Apr. 2, 2012) for a distributional analysis of the equity effects of changes in the design of the Residential Energy Credit. It is important to note that the claimant of a tax expenditure is not always the beneficiary. For example, while state and local tax-exempt bondholders could be considered to be the direct claimants or recipients of a tax expenditure, to the extent that interest costs for tax-exempt state and local bonds are lower than they would be otherwise, state and local governments benefit from the tax expenditure.

**Figure 1: Tax Expenditures on Tax Forms by Estimated Dollar Amount, Fiscal Year 2011**



Source: GAO analysis of IRS tax forms and Treasury tax expenditure amounts.

The sum of tax expenditure revenue loss estimates that appear in figure 1 approximates the total revenue forgone through tax expenditure provisions. While sufficiently reliable as a gauge of general magnitude, the sum of the individual revenue loss estimates has important limitations in that any interactions between tax expenditures will not be reflected in the sum.<sup>19</sup>

Data necessary to assess how often a tax expenditure is used and by whom generally would not be collected on tax returns unless IRS needs the information to know the correct amount of taxes owed or is legislatively mandated to collect or report the information. IRS is obligated

<sup>19</sup>For further discussion of the limitations of tax expenditure estimates see [GAO-13-167SP](#) and GAO, *Government Performance and Accountability: Tax Expenditures Represent a Substantial Federal Commitment and Need to Be Reexamined*, [GAO-05-690](#), (Washington, D.C.: Sept. 23, 2005).

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under the Paperwork Reduction Act to keep the administrative burden on taxpayers as low as possible, while still fulfilling its mission.<sup>20</sup>

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### Data for Evaluating Tax Expenditures May Not Be Available from Other Sources

In prior reports, we identified tax expenditures that could not be evaluated because appropriate data were not available from any source, including sources other than IRS. One example is Indian reservation depreciation (IRD), where IRS did not collect information on the identity of claimants, amounts claimed, or the location of the qualified investment. In addition, we could not find reliable data at other agencies on which taxpayers use IRD, how much IRD investment was made, or whether the provision was having a positive effect on economic development.<sup>21</sup>

For some tax expenditures, IRS data limitations can be remedied to some extent by information available from other federal agencies. For example, for Empowerment Zone (EZ) employment tax credits, IRS cannot separate the total credits claimed to show how much was claimed for specific EZ communities. This limitation is partially remedied by the Department of Housing and Urban Development (HUD), which collects community level information for some EZ-related tax expenditures. However, as we have previously reported, HUD was unable to validate the information on the use of some of these tax expenditures and it tracks

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<sup>20</sup>One way IRS makes tax expenditure data available to external parties such as the public and other government agencies is through its Statistics of Income Division. Section 6103 of the Internal Revenue Code requires confidentiality of returns and return information and limits the types of information IRS can share with these external parties.

<sup>21</sup>GAO, *Tax Expenditures: Available Data Are Insufficient to Determine the Use and Impact of Indian Reservation Depreciation*, [GAO-08-731](#) (Washington, D.C.: June 26, 2008). GAO has found a lack of evaluation data for other tax expenditures as well. See, for example, GAO, *Community Development: Limited Information on the Use and Effectiveness of Tax Expenditures Could Be Mitigated through Congressional Attention*, [GAO-12-262](#) (Washington, D.C.: Feb. 29, 2012).

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only a portion of the EZ employment credits.<sup>22</sup> HUD and IRS have begun collaborating to produce better data on the use of EZ tax credits.

For some tax expenditures, it may be possible to estimate missing IRS information using other sources such as public records, state agency records, and surveys. However, in general, such estimates cannot be expected to be as precise as data from tax returns. For example, in the case of an evaluation of the Research Tax Credit, a measure of spending that qualifies for the credit derived from research spending as reported on corporate annual reports will not be as accurate as a measure derived from corporate tax returns because of differences in the tax and accounting rules for reporting the spending.<sup>23</sup> The less accurate data can lead to less reliable conclusions from the evaluation.

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## Case Studies of Comparable Outlay and Tax Expenditure Programs Show Differences in Data Available for Measuring Performance

After reviewing the GPRAMA-mandated cross-agency priority (CAP) goals established by OMB and federal agencies, we chose four outlay programs—three addressing energy efficiency and one addressing job training—that we considered to be comparable to certain tax expenditures based on their similar purposes. Table 2 provides descriptions of these tax expenditures and comparable outlay programs.

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<sup>22</sup>GAO, *Empowerment Zone and Enterprise Community Program: Improvements Occurred in Communities, but the Effect of the Program is Unclear*, [GAO-06-727](#) (Washington, D.C.: Sept. 22, 2006). In some cases, when the basic data about claimants and amounts claimed were available in IRS, researchers outside the agencies have been able to measure aspects of the performance of certain tax expenditures using the agency data. For example, we matched IRS data on claimants of the Work Opportunity Tax Credit (WOTC) with DOL and state employment agency data to analyze characteristics of WOTC employers and the wage and employment history of WOTC hires. See GAO, *Work Opportunity Tax Credit: Employers Do Not Appear to Dismiss Employees to Increase Tax Credits*, [GAO-01-329](#) (Washington, D.C.: Mar. 13, 2001).

<sup>23</sup>For a discussion of data reliability issues, see GAO, *Tax Policy and Administration: Review of Studies of the Effectiveness of the Research Tax Credit*, [GAO/IGD-96-43](#) (Washington, D.C.: May 21, 1996).

**Table 2: Descriptions of Comparable Outlay Programs and Tax Expenditures**

Outlay programs			
Weatherization Assistance	Vehicle Technologies	Renewable Energy Programs	Workforce Investment Act (WIA) as it pertains to dislocated workers
<p>DOE provides assistance through its Weatherization Assistance Program to low-income families to reduce their energy bills by making their homes more energy efficient.</p> <p>The program includes Sustainable Energy Resources for Consumers Grants, which provide \$90 million in grants under the American Recovery and Reinvestment Act to support the use of energy efficiency and renewable energy technologies by 101 high-performing local weatherization providers.</p> <p>The program has developed the National Training and Education Resource to provide an “open source” platform for learners and instructors.</p>	<p>DOE provides funding opportunities for advanced vehicle technology projects through competitive solicitations for private firms, educational institutions, nonprofit organizations, state and local governments, Native American organizations, and individuals.</p> <p>DOE also provides funding through the Small Business Innovation Research and Small Business Technology Transfer to small (i.e., no more than 500 employees) businesses. For fiscal year 2013 there is \$34 million in funds available for grants up to \$3.45 million.</p>	<p>DOE provides:</p> <p><b>SunShot:</b> Funding for research and development of concentrating solar power technologies through competitive awards to industry, national laboratories, and universities for making solar energy systems cost competitive without subsidies.</p> <p><b>Wind:</b> Funding for wind power in rural, agricultural, and Native American communities through Wind Powering America awards to such entities as public-owned utilities and cooperatives.</p> <p><b>Biomass:</b> Funding for research for converting biomass resources into biofuels. Criteria for grants are unique to each request for proposal.</p>	<p>DOL provides funding for services to dislocated workers including those who have been laid off, have exhausted unemployment compensation, are unlikely to return to their previous industry, or are displaced homemakers.</p> <p>The funds are allocated to states, which then may allocate them to specialized centers in local labor market areas to provide services, including job search, placement assistance, and career counseling to qualified dislocated workers.</p>
Tax expenditures			
Residential Energy Credits	Alternative-Technology Vehicle Credit	Renewable Energy Production Credits	Work Opportunity Tax Credit
<p>A credit equal to 10 percent of the purchase price of qualified residential energy efficiency property, up to \$500.</p> <p>A credit equal to 30 percent of residential solar electric and water heating property, geothermal heat pumps, small wind energy property, and fuel cell power plants. For fuel cell property, the credit is limited to \$500 per half kilowatt of capacity.</p>	<p>A credit equal to 50 percent of the incremental cost of technology, which cannot exceed \$4,000 to \$32,000 per vehicle, depending on the vehicle type. The credit includes a 30 percent bonus credit for certain types of new qualified technology and higher credits are allowed for heavier vehicles.</p>	<p><b>Solar:</b> A credit equal to 1.1 cents per kilowatt hour for electricity produced from qualified property.</p> <p><b>Wind:</b> A credit equal to 2.2 cents per kilowatt hour for electricity produced from qualified property.</p> <p><b>Biomass:</b> A credit equal to 2.2 cents per kilowatt hour for electricity generated.</p>	<p>A credit generally equal to 40 percent of the first \$6,000 of wages during the first year of hire if the qualified worker is retained for at least 400 hours (and 25 percent for 120 to 399 hours).</p>

Sources: U.S. Congress, Senate Committee on the Budget, *Tax Expenditures: Compendium of Background Material on Individual Provisions*, S. Prt. 111-58. Prepared by CRS (Washington, D.C.: December 2010); U.S. Department of Energy, *Fiscal Year 2011 Annual Performance Report*; and Workforce Investment Act of 1998. The information from the annual reports was accessed from <http://www.performance.gov> on October 19, 2012.

Note: Residential Energy Credits refers to the tax credits for residential energy efficient property and for energy efficiency improvements to existing homes. Renewable Energy Production Credits refers to the tax credits for electricity production from renewable resources.

As shown in table 3, the four comparable outlay programs and tax expenditures associated with DOE and DOL had broadly similar purposes in the areas of energy conservation and employment.<sup>24</sup>

**Table 3: Purposes of Outlay Programs and Comparable Tax Expenditures for Four Case Studies, Fiscal Year 2011**

Outlay programs			Workforce Investment Act as it pertains to dislocated workers
Weatherization Assistance	Vehicle Technologies	Renewable Energy Programs	
To coordinate with national goals to reduce petroleum consumption and increase the energy efficiency of the U.S. economy, aiming at market transformation to reduce market barriers to the cost effective adoption of renewable energy and energy efficiency technologies.	To develop more energy efficient and environmentally friendly highway transportation technologies that will enable America to use less petroleum. The long-term aim is to develop "leap frog" technologies that will provide Americans with greater freedom of mobility and energy security, while lowering costs and reducing impacts on the environment.	<p><b>SunShot:</b> to make solar energy technologies cost-competitive by 2020.</p> <p><b>Wind:</b> to enable rapid expansion of clean, affordable, reliable, domestic wind power to promote national security, economic vitality, and environmental quality.</p> <p><b>Biomass:</b> to sustainably transform the nation's abundant renewable resources into biomass energy.</p>	To increase opportunities for America's workers to acquire the skills and knowledge to succeed in a knowledge-based economy.

<sup>24</sup>The purposes for tax expenditures in table 3 were derived from U.S. Congress, Senate Committee on the Budget, *Tax Expenditures: Compendium of Background Material on Individual Provisions*, S. Prt. 111-58. Prepared by the Congressional Research Service (CRS) (Washington, D.C.: December 2010). The purposes for the outlay programs were derived from the DOE and DOL fiscal year 2011 agency performance reports. Categories of outlay programs that were comparable to the tax expenditures were identified in the annual reports and we matched the tax expenditures to specific programs within these categories by comparing their structure and purpose. Details of this match are provided in appendix I.



Tax expenditures			
Residential Energy Credits	Alternative-Technology Vehicle Credit	Renewable Energy Production Credits	Work Opportunity Tax Credit
To reduce energy consumption by enhancing residential energy efficiency, consistent with increasing energy security and addressing environmental concerns.	To transform the mode of transportation in the United States toward clean, fuel-efficient vehicles, reducing reliance on imported petroleum.	To encourage the development and utilization of electric generating technologies that use specified renewable energy resources, as opposed to conventional fossil fuels.	To help individuals, who have difficulty obtaining employment in both good and bad economic times, get jobs in the private sector. The credit is designed to reduce the relative cost of hiring the low-skilled individuals by subsidizing their wages, and hence to increase employers' willingness to give them jobs despite their presumed low productivity.

Sources: U.S. Congress, Senate Committee on the Budget, *Tax Expenditures: Compendium of Background Material on Individual Provisions*, S. Prt. 111-58. Prepared by CRS (Washington, D.C.: December 2010); U.S. Department of Energy, *Fiscal Year 2011 Annual Performance Report*; and U.S. Department of Labor, *Fiscal Year 2011 Annual Performance Report*. The information from the annual reports was accessed from <http://www.performance.gov> on October 19, 2012.

As shown in table 4, DOE and DOL produced performance measures and goals for outlay programs in their annual reports but did not do so for the comparable tax expenditures. Agencies were not required by GPRAMA to produce these measures for the tax expenditures. Also, IRS collects the basic information about claimants and the amounts claimed for the four tax expenditures in our case studies. (See appendix II table 5). But, since IRS is not tasked with evaluating tax expenditures, it has not formulated performance measures or goals for these tax expenditures.

**Table 4: Performance Measures and Goals of Outlay Programs and Comparable Tax Expenditures for Four Case Studies, Fiscal Year 2011**

Outlay programs			
Weatherization Assistance	Vehicle Technologies	Renewable Energy Programs	Workforce Investment Act as it pertains to dislocated workers
<b>Performance measures</b>			
Number of weatherized homes	Gallons of petroleum saved Kilowatts per kilogram, kilowatts per liter, and cost at kilowatt peak	<b>SunShot (Solar):</b> change in electricity cost <b>Wind:</b> number of wind turbines installed <b>Biomass:</b> production capacity of gallons of advanced biofuels	Average earnings for WIA-related dislocated worker

Outlay programs			
Weatherization Assistance	Vehicle Technologies	Renewable Energy Programs	Workforce Investment Act as it pertains to dislocated workers
<b>Performance goals</b>			
Weatherize over 1 million homes starting in fiscal year 2002	Reduce petroleum consumption by 570 million gallons per year by 2011  Reduce cost of electric-drive technologies to \$18 per kilowatt peak	<b>SunShot (Solar):</b> electricity cost reduced to 14 to 16 cents per kilowatt hour  <b>Wind Energy:</b> 5,369 wind turbines in fiscal year 2011  <b>Biomass:</b> increase production capacity by more than 5 million gallons of advanced biofuels in fiscal year 2011; to 100 million by fiscal year 2014	Six months average earnings for WIA-related dislocated worker increased to \$16,567 by fiscal year 2013
<b>Data sources used in the performance reports</b>			
<i>An Evaluation of State Energy Program Accomplishments: 2002 Program Year</i> , ORNL/Con-492, (adjusted for inflation) 2005 Oak Ridge National Laboratory; available by contacting DOE.	National Renewable Energy Laboratory's <i>Clean Cities 2010 Annual Metrics Report</i> (NREL/TP-7A30-52714).  September 2011 Oak Ridge National Laboratory monthly status report to DOE.	<b>SunShot (Solar):</b> results from National Renewable Energy Laboratory's Solar Advisor Model, available by contacting DOE.  <b>Wind:</b> American Wind Energy Association's 2010 <i>U.S. Small Wind Turbine Market Report</i> .  <b>Biomass:</b> engineering independent reports on the Abengoa Hugoton and Mascoma Frontier Renewables projects (confidential and business sensitive).	Data in DOL <i>Fiscal Year Annual Performance Report</i> , based on data collected through annual (ETA-9091) and quarterly (ETA-9090) state WIA performance reports.
<b>Tax expenditures</b>			
Residential Energy Credits	Alternative-Technology Vehicle Credit	Renewable Energy Production Credits	Work Opportunity Tax Credit
Neither IRS nor the agencies responsible for these outlay programs created performance goals or measures for tax expenditures in fiscal year 2011. GPRMA and GPRAMA do not require them to do so.			

Sources: U.S. Congress, Senate Committee on the Budget, *Tax Expenditures: Compendium of Background Material on Individual Provisions*, S. Prt. 111-58. Prepared by CRS (Washington, D.C.: December 2010); U.S. Department of Energy, *Fiscal Year 2011 Annual Performance Report*; and U.S. Department of Labor, *Fiscal Year 2011 Annual Performance Report*.

The performance measures shown in table 4 can track the progress of the outlay programs, on an ongoing basis, toward specific goals (stated in terms of number of gallons produced, number of turbines installed, etc.). However, additional data may be needed for an assessment of broader purposes and the impact of the programs. For example, for the vehicle technologies program, the purpose of reducing petroleum consumption

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can be measured by the performance measure in table 4 (gallons of petroleum saved) but additional data are needed to measure the outlay program's broader purpose of reducing environmental impacts.<sup>25</sup>

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## Concluding Observations

With so much spending going through the tax code in the form of tax expenditures, the need to determine whether this spending is achieving its purpose becomes more pressing. This report identifies gaps in the data required to evaluate tax expenditures but makes no recommendations on how to fill these gaps. A key step in collecting the data is first determining who should undertake this task. As we said in our guide for evaluating tax expenditures, the agency or agencies responsible for the program ought to determine what data should be collected to evaluate tax expenditures relevant to their goals. We recommended in our 2005 report that the Director of OMB, in consultation with the Secretary of the Treasury, determine which agencies will have leadership responsibilities to review tax expenditures and how to address the lack of credible performance information on tax expenditures.<sup>26</sup> However, these agencies have not yet been identified. GPRAMA may make a start on answering the question of who should evaluate tax expenditures by requiring that the responsible agencies identify the various program activities that contribute to their goals, which we believe should include tax expenditures.

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## Agency Comments and Our Evaluation

The IRS provided technical comments after viewing a draft of this report, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 30 days from the report date. At that time, we are sending copies of this report to the Acting Commissioner of Internal Revenue and other interested parties. This

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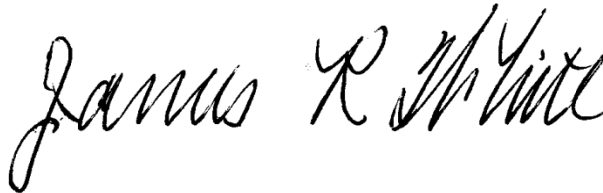
<sup>25</sup>Our analysis of the agencies' data is for the performance measures that appear in their fiscal year 2011 performance reports. We did not attempt to determine whether the agencies had attempted such evaluations or to examine these or any other data that they may have used for these evaluations.

<sup>26</sup>[GAO-05-690](#).

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report will also be available at no charge on GAO's website at <http://www.gao.gov>.

If you have any questions on this report, please contact me at (202) 512-9110 or [whitej@gao.gov](mailto:whitej@gao.gov). Contact points for our offices of Congressional Relations and Public Affairs may be found on the last page of this report. Key contributors to this report are listed in appendix III.

A handwritten signature in black ink that reads "James R. White". The signature is written in a cursive style with a large, prominent initial "J".

James R. White  
Director, Tax Issues  
Strategic Issues

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# Appendix I: Scope and Methodology

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To determine what Internal Revenue Service (IRS) data are available for evaluating tax expenditures, we used 173 tax expenditures for fiscal year 2011 that were developed by the Department of the Treasury (Treasury) and reported by the Office of Management and Budget (OMB) in *Analytical Perspectives, Budget of the United States Government, Fiscal Year 2012*. We reviewed IRS tax returns, tax forms, information returns, and publications for tax year 2011 and categorized the tax expenditures based on whether they were (1) not listed on tax forms, (2) listed on tax forms but did not have their own line item, or (3) listed on tax forms and had their own line item so the claimants and the amount claimed could be identified. The tax returns we reviewed were primarily Form 1040 for individual taxpayers, Form 1120 for corporate taxpayers, and Form 990 for tax-exempt organizations. Although the tax expenditure concept can also be applied to other kinds of taxes, such as excise taxes, this report covers only tax expenditures for the federal income tax system.

We sent a list of the tax expenditures that we initially identified as not appearing on a tax form to IRS for verification of our assignment of these tax expenditures to this category. (IRS was not able to verify our assignment of all of the tax expenditures to their categories due to time constraints encountered as the agency readied for the tax filing season.) In addition, when IRS verified those not listed on a tax form, it generally used information from tax returns but not from information returns.

Our assignment of the tax expenditures to the three categories sometimes required that we make judgments about the adequacy of the information on the tax forms. For example, according to IRS, the amount of deferred income from installment sales can be obtained from Form 6252 (Installment Sale Income) by subtracting the installment sale income line item from the gross profit line item. However, according to OMB, this difference does not represent the amount of the tax expenditure. The tax expenditure is the deferred amount less than \$5 million for which non-dealers are not required to pay interest on their deferred taxes. Therefore, since we could not identify the deferral amount for non-dealers, and the amount of the tax expenditure deferral does not have its own line item, we classified it as a tax expenditure that is on a tax form but does not have its own line item.

During our matching, we identified 10 tax expenditures that we did not include in our analysis because (1) they were not available in tax year 2011, such as the Hope Tax Credit which was temporarily replaced by the American Opportunity Tax Credit; (2) some but not all parts of the tax expenditure were on a tax form, such as the Exclusion of Benefits and

Allowances to Armed Forces Personnel where only the combat pay portion was reported on a tax form—Form W-2 (Wage and Tax Statement); and (3) where reporting of the tax expenditure was optional, such as Employer Plans on Form W-2. Some tax expenditures use multiple tax forms, multiple line items, or both on the forms to account for all parts of the tax expenditure. When multiple forms or line items were used, we considered the tax expenditure as having its own line item when all parts of the tax expenditure were on tax forms and had their own line items. For example, the Adoption Credit and Exclusion tax expenditure lists the credit and exclusion on different line items of the Form 8839 (Qualified Adoption Expenses). Therefore, we considered this tax expenditure as having its own line item.

We used the fiscal year 2013 budget, for fiscal year 2011 revised estimates, to identify the tax expenditure amounts. We chose the tax expenditure estimates reported in the budget for our analysis because Treasury develops revised estimates based on changes in tax policy and economic activity for the year prior to the reported fiscal budget year (i.e., retrospective estimates). Even though Treasury's estimates are retrospective, the final reported numbers are still estimates and may not reflect additional policy changes. In addition, tax expenditure revenue loss estimates for specific provisions do not take into account potential behavioral responses to changes in these provisions on the part of taxpayers. These revenue loss estimates do not represent the amount of revenue that would be gained if certain tax expenditures were repealed since repeal would probably change taxpayer behavior in some way that would affect revenue.

For tax expenditures that were listed on tax forms, we reviewed IRS's Statistics of Income (SOI) *Proposed Tax Year 2010 Forms and Schedules* to determine whether SOI collected data for tax year 2010, the latest year available. We also reviewed SOI publications to identify the types of available information and whether they included tax expenditures. We reviewed our prior reports to identify instances where IRS data available for evaluating tax expenditures were limited and the limitations were not remedied by data from other sources.

To analyze examples of data that agencies used to evaluate outlay programs that are comparable to tax expenditures, we visited the performance.gov web site on October 19, 2012. We reviewed the Government Performance and Results Act Modernization Act of 2010-mandated crosscutting, or what OMB calls cross-agency priority (CAP), goals for contributing agencies and programs that explicitly included tax

expenditures among their policy initiatives. As examples of tax expenditures, we chose five tax credits from the sixteen tax expenditures listed under the CAP goal of energy efficiency and the one tax credit listed under the CAP goal of job training. As examples of what we considered to be comparable outlay programs, we chose three energy efficiency and renewable energy outlay programs, Weatherization, Vehicle Technologies, and Renewable Energy, and one Department of Labor-based outlay program, the Workforce Investment Act as it pertained to dislocated workers. We then reviewed the 2011 annual performance reports from the Department of Energy and the Department of Labor. We used fiscal year 2011 performance reports so the performance data would be comparable to the tax expenditure data we analyzed for tax year 2011. These performance reports were not available for fiscal year 2012. We identified their performance measures and goals, as well as the data they used to evaluate and assess these outlay programs. Lastly, we used our own criteria for performance measures and examples of data used to construct them. Table 2 provides a more detailed description of the tax expenditures and comparable outlay programs.

# Appendix II: Tax Expenditures and Their Inclusion on Tax Forms

To determine whether tax expenditures were included on tax forms and had their own line items, we matched the Department of Treasury's list of tax expenditures for fiscal year 2011 to Internal Revenue Service tax forms for tax year 2011. The relationships of the tax expenditures to tax forms are shown in table 5.

**Table 5: Tax Expenditures and Their Relationship to Tax Forms by Type of Tax Expenditure, Tax Year 2011**

Tax expenditure	Tax expenditure not on tax form	Tax expenditure on tax form but did not have its own line item	Tax expenditure on tax form and had its own line item
<b>Credits</b>			
Inventory property sales source rules exception		X	
Credit for increasing research activities			X
Alternative fuel production credit			X
Energy production credit			X
Energy investment credit			X
Alcohol fuel credits			X
Biodiesel and small agri-biodiesel producer tax credits			X
Credit for holding clean renewable energy bonds		X	
Credit for investment in clean coal facilities			X
Credit for construction of new energy efficient homes			X
Credit for energy efficiency improvements to existing homes			X
Credit for energy efficient appliances			X
Credit for residential energy efficient property			X
Qualified energy conservation bonds		X	
Advanced energy property credit			X
Tax incentives for preservation of historic structures			X
Industrial carbon dioxide capture and sequestration tax credit			X
Credit for low-income housing investments			X
Credit for homebuyer			X
Tax credit for certain expenditures for maintaining railroad tracks			X
Investment credit for rehabilitation of structures (other than historic)			X
New markets tax credit			X
Credit to holders of gulf tax credit bonds		X	
Lifetime learning tax credit		X	
American opportunity tax credit		X	
Credit for holders of zone academy bonds		X	
Qualified school construction bonds		X	



**Appendix II: Tax Expenditures and Their  
Inclusion on Tax Forms**

<b>Tax expenditure</b>	<b>Tax expenditure not on tax form</b>	<b>Tax expenditure on tax form but did not have its own line item</b>	<b>Tax expenditure on tax form and had its own line item</b>
Work opportunity tax credit			X
Employer-provided child care credit			X
Child tax credit			X
Credit for child and dependent care expenses			X
Credit for disabled access expenditures			X
Employee retention credit for employers in certain federal disaster areas		X	
Credit for employee health insurance expenses of small business			X
Tax credit for orphan drug research			X
Tax credit for health insurance purchased by certain displaced and retired individuals			X
Tax credit for the elderly and disabled			X
Earned income tax credit			X
Build America bonds		X	
<b>Total</b>	<b>0</b>	<b>10</b>	<b>29</b>
<b>Deductions</b>			
Excess of percentage over cost depletion, fuels		X	
Exception from passive loss limitation for working interests in oil and gas properties		X	
Allowance of deduction for certain energy efficient commercial building property		X	
Deduction for endangered species recovery expenditures		X	
Small life insurance company deduction			X
Deductibility of mortgage interest on owner-occupied homes			X
Deductibility of state and local property tax on owner-occupied homes			X
Exception from passive loss rules for \$25,000 of rental loss		X	
Ordinary income treatment of loss from small business corporation stock sale		X	
Deduction for U.S. production activities			X
Special rules for certain film and television production		X	
Deductibility of student-loan interest			X
Deduction for higher education expenses			X
Deductibility of charitable contributions (education)		X	
Special deduction for teacher expenses			X

**Appendix II: Tax Expenditures and Their  
Inclusion on Tax Forms**

<b>Tax expenditure</b>	<b>Tax expenditure not on tax form</b>	<b>Tax expenditure on tax form but did not have its own line item</b>	<b>Tax expenditure on tax form and had its own line item</b>
Deductibility of charitable contributions, other than education and health		X	
Self-employed medical insurance premiums			X
Medical savings accounts/health savings accounts			X
Deductibility of medical expenses			X
Deductibility of charitable contributions (health)		X	
Special Blue Cross/Blue Shield deduction			X
Additional deduction for the blind			X
Additional deduction for the elderly			X
Deductibility of casualty losses			X
Deductibility of nonbusiness state and local taxes other than on owner-occupied homes			X
<b>Total</b>	<b>0</b>	<b>10</b>	<b>15</b>
<b>Exemptions</b>			
Exemption of credit union income			X
Special alternative tax on small property and casualty insurance companies			X
Tax exemption of certain insurance companies owned by tax-exempt organizations			X
Exemption of certain mutuals' and cooperatives' income			X
Recovery zone bonds		X	
Tribal economic development bonds		X	
Parental personal exemption for students age 19 or over		X	
<b>Total</b>	<b>0</b>	<b>3</b>	<b>4</b>
<b>Exclusions</b>			
Exclusion of income earned abroad by U.S. citizens			X
Exclusion of certain allowances for federal employees abroad	X		
Exclusion of interest on energy facility bonds		X	
Exclusion of utility conservation subsidies	X		
Exclusion of interest on bonds for water, sewage, and hazardous waste facilities		X	
Exclusion of gain or loss on sale or exchange of certain brownfield sites	X		
Treatment of loans forgiven for solvent farmers		X	
Exclusion of interest on life insurance savings	X		

**Appendix II: Tax Expenditures and Their  
Inclusion on Tax Forms**

<b>Tax expenditure</b>	<b>Tax expenditure not on tax form</b>	<b>Tax expenditure on tax form but did not have its own line item</b>	<b>Tax expenditure on tax form and had its own line item</b>
Exclusion of interest spread of financial institutions	X		
Exclusion of interest on owner-occupied mortgage subsidy bonds		X	
Exclusion of interest on rental housing bonds		X	
Capital gains exclusion on home sales		X	
Exclusion of net imputed rental income	X		
Discharge of mortgage indebtedness		X	
Cancellation of indebtedness		X	
Exceptions from imputed interest rules	X		
Capital gains exclusion of small corporation stock		X	
Step-up basis of capital gains at death		X	
Exclusion of interest on small issue bonds		X	
Exclusion of reimbursed employee parking expenses	X		
Exclusion for employer-provided transit passes	X		
Exclusion of interest on bonds for highway projects and rail-truck transfer facilities		X	
Exclusion of interest for airport, dock, and similar bonds		X	
Education individual retirement accounts	X		
State prepaid tuition plans		X	
Exclusion of interest on student-loan bonds		X	
Exclusion of interest on bonds for private nonprofit educational facilities		X	
Exclusion of interest on savings bonds redeemed to finance educational expenses			X
Exclusion of employer-provided educational assistance	X		
Discharge of student loan indebtedness	X		
Employer provided child care exclusion			X
Assistance for adopted foster children	X		
Exclusion of employee meals and lodging (other than military)	X		
Exclusion of certain foster care payments	X		
Exclusion for benefits provided to volunteer EMS and firefighters	X		
Exclusion of employer contributions for medical insurance premiums and medical care			X
Exclusion of interest on hospital construction bonds		X	
Distributions from retirement plans for premiums for health and long-term care insurance		X	
Exclusion of railroad retirement system benefits		X	
Exclusion of workers' compensation benefits		X	

**Appendix II: Tax Expenditures and Their  
Inclusion on Tax Forms**

<b>Tax expenditure</b>	<b>Tax expenditure not on tax form</b>	<b>Tax expenditure on tax form but did not have its own line item</b>	<b>Tax expenditure on tax form and had its own line item</b>
Exclusion of public assistance benefits (normal tax method)	X		
Exclusion of special benefits for disabled coal miners	X		
Exclusion of military disability pensions		X	
401(k) plans			X
Individual retirement accounts			X
Low and moderate income savers credit			X
Keogh plans			X
Premiums on group term life insurance	X		
Premiums on accident and disability insurance	X		
Income of trusts to finance supplementary unemployment benefits	X		
Social Security benefits for retired workers		X	
Social Security benefits for disabled workers		X	
Social Security benefits for spouses, dependents and survivors		X	
Exclusion of veterans death benefits and disability compensation	X		
Exclusion of veterans pensions		X	
Exclusion of GI bill benefits	X		
Exclusion of interest on veterans housing bonds		X	
Exclusion of interest on public purpose state and local bonds		X	
<b>Total</b>	<b>23</b>	<b>27</b>	<b>8</b>
<b>Deferrals</b>			
Deferral of income from controlled foreign corporations (normal tax method)		X	
Deferred taxes for financial firms on certain income earned overseas	X		
Expensing of research and experimentation expenditures (normal tax method)		X	
Expensing of exploration and development costs, fuels		X	
Deferral of gain from dispositions of transmission property to implement Federal Energy Regulatory Commission restructuring policy		X	
Temporary 50 percent expensing for equipment used in the refining of liquid fuels		X	
Natural gas distribution pipelines treated as 15-year property		X	
Amortize all geological and geophysical expenditures over 2 years		X	
Expensing of exploration and development costs, nonfuel minerals		X	
Excess of percentage over cost depletion, nonfuel minerals		X	

**Appendix II: Tax Expenditures and Their  
Inclusion on Tax Forms**

<b>Tax expenditure</b>	<b>Tax expenditure not on tax form</b>	<b>Tax expenditure on tax form but did not have its own line item</b>	<b>Tax expenditure on tax form and had its own line item</b>
Expensing of multiperiod timber growing costs		X	
Expensing of certain capital outlays		X	
Expensing of certain multiperiod production costs		X	
Deferral of gain on sale of farm refiners	X		
Expensing of reforestation expenditures		X	
Deferral of income from installment sales		X	
Accelerated depreciation on rental housing (normal tax method)			X
Carryover basis of capital gains on gifts		X	
Accelerated depreciation of buildings other than rental housing (normal tax method)		X	
Accelerated depreciation of machinery and equipment (normal tax method)		X	
Expensing of certain small investments (normal tax method)		X	
Deferral of tax on shipping companies	X		
Expensing of environmental remediation costs		X	
Deferral of interest on US savings bonds	X		
<b>Total</b>	<b>4</b>	<b>19</b>	<b>1</b>
<b>Preferential tax rates</b>			
Capital gains treatment of royalties on coal		X	
Capital gains treatment of certain timber income		X	
Capital gains treatment of certain income		X	
Income averaging for farmers			X
Treatment of qualified dividends			X
Capital gains (except agriculture, timber, iron ore, and coal)		X	
Graduated corporation income tax rate (normal tax method)		X	
<b>Total</b>	<b>0</b>	<b>5</b>	<b>2</b>
<b>Multiple types</b>			
Tax credit and deduction for clean-fuel burning vehicles			X
Empowerment zones and renewal communities		X	
Adoption credit and exclusion			X
<b>Total</b>	<b>0</b>	<b>1</b>	<b>2</b>
<b>Total for all tax expenditures</b>	<b>27</b>	<b>75</b>	<b>61</b>

Source: GAO analysis of Treasury tax expenditures and IRS tax forms.

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# Appendix III: GAO Contact and Staff Acknowledgments

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## GAO Contact

James R. White, (202) 512-9110 or [whitej@gao.gov](mailto:whitej@gao.gov)

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## Staff Acknowledgments

In addition to the contact name above, Kevin Daly, (Assistant Director), Laurie King (Analyst-in-Charge), Jeff Arkin, Elizabeth Curda, Robert Gebhart, Lois Hanshaw, Benjamin Licht, Ed Nannenhorn, Karen O'Connor, Michael O'Neill, Robert Robinson, Alan Rozzi, MaryLynn Sergent, Stephanie Shipman, and Anne Stevens all made contributions to this report.

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