Capitol Hill briefing. November 3, 2023



#### In this issue:

Democrats blast House-passed bill that cuts IRS funding to pay for Israel assistance	1
Finance Committee approves Rollinson's nomination as IRS chief counsel	5
Deloitte Tax looks at Pillar One draft treaty	6
Deloitte Tax resources address implications of Pillar Two for global stock-based compensation, state and local taxes	8
House taxwriters approve disaster-relief package	9
IRS permanently allows use of e-signatures for select forms	11
Finance Committee schedules hearing on high-income individuals, tax planning, and the federal tax code	12
Blumenauer to retire after 2024	12

# Democrats blast House-passed bill that cuts IRS funding to pay for Israel assistance

In one of his first major moves since taking the top spot in the House of Representatives just days ago, Speaker Mike Johnson, R-La., shuttled legislation through the chamber this week that would rescind \$14.3 billion in

mandatory funding provided to the Internal Revenue Service as part of the Inflation Reduction Act of 2022 (P.L. 117-169) in order to offset an equivalent amount of military assistance to Israel. But Senate Democrats and the White House quickly blasted the proposal and challenged the veracity of GOP claims that the proposed IRS spending cuts are budgetary "savings."

URL: https://www.congress.gov/117/plaws/publ169/PLAW-117publ169.pdf

The Israel Security Supplemental Appropriations Act, 2024 (H.R. 6126) passed the House on November 2 by a vote of 226-196. Although a dozen House Democrats crossed over to support the legislation, President Biden and Senate Majority Leader Charles Schumer, D-N.Y., have consistently castigated the bill since its introduction, dimming its prospects for success as spending talks continue.

URL: https://rules.house.gov/sites/republicans.rules118.house.gov/files/ISRAELFINAL xml.pdf

#### Dead-on-arrival in the Senate

Although most House Democrats may have been eager to support the aid for Israel—including the amount proposed in this bill, which aligns with the Israel component of a recent White House supplemental spending request—the vast majority of the caucus had a relatively easy time dismissing the Republican-drafted aid package as overly partisan.

At the most basic level, "emergency supplemental appropriations" legislation—as the House GOP's Israel assistance measure was designated—is not customarily offset, by either party, with other budgetary measures.

And the "pay-for" House Republicans chose to offset the Israel aid—that is, clawing-back an equivalent amount of IRS funding that had been provided through the Inflation Reduction Act, most of which is set to be dedicated to enhanced tax enforcement efforts over the coming years, especially with respect to large corporate and high net worth taxpayers—was cast by Democrats as a budget ploy that stands no chance in the Democratic-controlled Senate.

"Speaker Johnson is failing his first test," Rep. Jake Auchincloss, D-Mass., wrote in a social media post. "Conditioning aid to Israel on helping the rich avoid taxes is cynical partisanship, not leadership."

Across the Capitol, Senate Majority Leader Charles Schumer, D-N.Y., urged Speaker Johnson before the vote to "quickly change course . . . because this stunningly unserious proposal is not going to be the answer."

And at the White House, President Biden announced in a statement of administration policy that he would veto the House bill if it reached his desk, adding that the GOP measure "would create a dangerous precedent of demanding partisan poison pill offsets in return for meeting core national security needs of the United States."

**URL:** https://www.whitehouse.gov/wp-content/uploads/2023/11/Israel-Security-Supplemental-Appropriations-Act-SAP.pdf

### The budget offset that wasn't

Democratic opposition to the measure was cemented further when the nonpartisan Congressional Budget Office (CBO) released a formal estimate—prepared in response to a request from Reps. Steny Hoyer, D-Md., and Brad Schneider, D-III.—of the budgetary effects of House Republicans' proposed IRS recissions.

URL: https://www.cbo.gov/system/files/2023-11/Letter to Hoyer.pdf

In that assessment, the CBO projects that the bill's \$14.3 billion cut to the IRS's mandatory funding stream provided by the Inflation Reduction Act would actually increase the deficit by a net amount of about \$12.5 billion over the next 10 years, through the combined effects of a roughly \$14.3 billion reduction in direct spending and a \$26.8 billion reduction in revenues because of forgone tax collections. (It's worth noting that the CBO recently estimated that a proposal by Kentucky Republican Sen. Rand Paul to slice \$25 billion from the IRS's newly increased enforcement budget, which he offered as an amendment to a three-bill "minibus" appropriations package in that chamber, would result in a net increase to the federal deficit of nearly \$23.8 billion over 10 years. Paul's proposed amendment was defeated this week by a vote of 23-74. The minibus appropriations package was subsequently approved by a vote of 82-15.)

URL: https://www.cbo.gov/system/files/2023-10/Whitehouse\_letter-SA1226\_10-16-2023\_1.pdf

This dynamic between enhanced tax enforcement and deficit reduction is well-known to Democratic taxwriters and Democrats relied on it as a key offset when they drafted the Inflation Reduction Act last year, so the results of the CBO's analysis of the House GOP's aid package prompted a wry response from Ways and Means Committee ranking member Richard Neal, D-Mass.

"Told you so," Neal said in a November 1 news release.

**URL:** https://democrats-waysandmeans.house.gov/media-center/press-releases/neal-statement-deficit-increasing-cbo-score-republicans-political-ploy

## Senate GOP has its own views

The House GOP's Israel assistance bill also prompted concerns from a number of Senate Republicans, who were disappointed that the bill does not include additional assistance for Ukraine.

"[T]he threats facing America and our allies are serious and they're intertwined," said Senate Minority Leader Mitch McConnell, R-Ky., on October 31. "If we ignore that fact, we do so at our own peril."

McConnell, for his part, supports a \$106 billion aid package put forward by the Biden administration that would not only provide military assistance to Israel and Ukraine, but also provide assistance to Taiwan, fund humanitarian relief efforts, and shore up security on the US southern border.

Senate Appropriations Committee ranking Republican Susan Collins of Maine also gave her backing to a more expansive aid package.

"It's not only a bill to help our ally Israel, and to assist the Ukrainians in repelling the Russian invasion," Collins said of the White House proposal. "It also includes funding to help discourage China from its ambitions, and it has absolutely critical money for border security."

Senate Democrats—led by Majority Leader Schumer—are also standing firmly behind the White House proposal.

It is important to note, however, that the views espoused by McConnell and Collins this week on a global aid package are by no means a consensus position among Senate Republicans, a number of whom would prefer to bifurcate the issues and begin by passing an Israel-only bill. Support for a unified measure like the president's request faces even more challenges among House Republicans, who are more reluctant than their Senate counterparts to continue to fund the war effort in Ukraine.

#### November 17 appropriations deadline also looms

The discussion over billions in global aid spending is coming at a time when the nation is also once again moving toward a possible government shutdown, as the current continuing resolution (CR) keeping the government's doors open is set to expire in just two weeks, on November 17.

In a letter to his GOP colleagues penned during his brief campaign to lead the House, now-Speaker Johnson outlined what he characterized as an "ambitious schedule" for the chamber to clear all 12 individual spending measures required to fund federal government operations for the remainder of fiscal year 2024 which began on October 1. He noted, though, that if a broad-scale agreement on funding is not in place by the time the current CR expires—a near-certainty at this point—he would be open to a stopgap measure "that expires on January 15 or April 15 . . . to ensure the Senate cannot jam the House with a Christmas omnibus."

During a November 2 press conference, Johnson reiterated that he would favor a CR through January 15. But—somewhat confusingly to many observers—he also mentioned a possible "laddered" CR that would apparently extend programs within particular appropriations measures along a staggered schedule that, in theory, would be designed to compel legislative action on individual spending bills as those various deadlines arrive and, in the process, avoid the type of so-called "omnibus" spending measure that has drawn the ire of conservatives.

Regardless of the duration and structure of any stopgap measure (or measures), Johnson will also have to determine whether funding would be set at the fiscal year 2023 levels in place under the current CR—as supported by congressional Democrats—or if he would instead insist on spending cuts as demanded by more conservative House Republicans during the last round of House and Senate negotiations on a funding patch in the days leading up to the close of fiscal year 2023 on September 30.

Also unclear is whether Johnson would accept a "clean" CR (that is, with no extraneous provisions) or if he would instead demand certain policy riders that are favored by some factions within the Republican Conference but are generally viewed as nonstarters by the Senate and the White House.

Any decisions around whether Congress will move a year-end omnibus spending package or a continuing resolution that extends into next year—and what a CR, if adopted, might look like—will, of course, have to be hammered out by Johnson, Senate Majority Leader Schumer, and Senate Minority Leader McConnell (since such a measure would be unable to overcome a Senate filibuster if all Republicans oppose it), and also be acceptable to President Biden.

Alex Brosseau
 Tax Policy Group
 Deloitte Tax LLP

# Finance Committee approves Rollinson's nomination as IRS chief counsel

The Senate Finance Committee advanced a key tax policy nominee on November 2, voting 16-11 to send to the full Senate the nomination of Marjorie Rollinson, President Biden's pick to serve as the next chief counsel for the Internal Revenue Service. Two Republicans on the panel, Sens. Bill Cassidy of Louisiana and Thom Tillis of North Carolina, joined 14 Democrats in the "aye" column.

The chief counsel is one of only two posts at the IRS that require Senate confirmation—the other is the commissioner—and plays a key role in developing guidance and regulations on new tax legislation. The position has been vacant since President Biden took office in January of 2021. William Paul, the current principal deputy chief counsel, has been serving as acting chief counsel in the interim.

Rollinson, who is currently retired, spent much of the past 36 years at a Big Four professional services firm, most recently as deputy director of its national tax department. However, she also served in the IRS chief counsel's office from 2013 to 2019, finishing her time there as associate chief counsel, international.

At a Finance Committee hearing September 28, Republican senators posed a host of questions to Rollinson on topics including the OECD project to overhaul international tax rules, interpretation of the tax provisions from Inflation Reduction Act of 2022 (P.L. 117-169) and the guidance implementing those provisions, and IRS's focus for taxpayer audits. (For details on Rollinson's responses, see *Tax News & Views*, Vol. 24, No. 32, Sep. 29, 2023. The Finance Committee on October 11 released Rollinson's written responses to additional questions for the record that taxwriters submitted after the hearing.)

**URL:** https://www.congress.gov/117/plaws/publ169/PLAW-117publ169.pdf **URL:** https://dhub.deloitte.com/Newsletters/Tax/2023/TNV/230929\_1.html

https://www.finance.senate.gov/imo/media/doc/responses\_to\_questions\_for\_the\_record\_to\_marjorie\_rollinson.pdf

The top Republican on the panel, Sen. Mike Crapo of Idaho, said in his statement before this week's vote that Rollinson "has a strong resume and impressive technical expertise" and that he was encouraged by the commitments she made in her hearing and meetings with senators; however, he ultimately concluded that he could not support her nomination "given the many existing unresolved issues at the IRS and Treasury."

"There are a number of concerning developments at the IRS and Treasury," Crapo said, "including an increasingly partisan framing of the tax gap and IRS enforcement efforts; the continued inability of the IRS to adequately address long-known security flaws; the IRS's continued focus on the development of the partisan and duplicative Direct File program; and Treasury's advancement of the OECD Pillar Two negotiations without meaningful congressional input, to the likely detriment of domestic businesses and workers. Despite continued assurances that transparency and taxpayer service will improve, there haven't been demonstrable changes to support these commitments."

In his own statement supporting Rollinson's nomination, Finance Committee Chairman Ron Wyden, D-Ore., noted "[i]t's no secret that Democrats and Republicans have differing views about how the IRS should operate," but he added that the role of the chief counsel has traditionally received bipartisan support.

Plans for taking up Rollinson's nomination on the Senate floor had not been announced at press time.

Storme Sixeas
 Tax Policy Group
 Deloitte Tax LLP

# **Deloitte Tax looks at Pillar One draft treaty**

The OECD on October 11 published the "current consensus" of a multilateral convention for the implementation of Pillar One Amount A (the "Pillar One MLC" or MLC). The Pillar One MLC was accompanied by an explanatory statement and an Understanding on the Application of Certainty under Amount A. The OECD also published an updated estimate of the economic impact of Amount A and an overview document. Taken together, these documents represent about 1,000 pages of text.

**URL:** https://www.oecd.org/tax/inclusive-framework-releases-new-multilateral-convention-to-address-tax-challenges-of-globalisation-and-digitalisation.htm

URL: https://www.oecd.org/tax/beps/multilateral-convention-to-implement-amount-a-of-pillar-one.pdf

**URL:** https://www.oecd.org/tax/beps/explanatory-statement-multilateral-convention-to-implement-amount-a-of-pillar-one.pdf

**URL:** https://www.oecd.org/tax/beps/understanding-on-the-application-of-certainty-for-amount-a-of-pillar-one.pdf **URL:** https://www.oecd.org/tax/beps/multilateral-convention-amount-A-pillar-one-overview.pdf

#### Some unfinished business

Importantly, the Pillar One MLC is not yet open for signature as there are still areas being negotiated, largely defined in the footnotes to the Pillar One MLC. On October 16, US Treasury Secretary Janet Yellen told reporters that the negotiations with respect to the Pillar One MLC "will take into next year." (For prior coverage, see *Tax News & Views*, Vol. 24, No. 35, Oct. 20, 2023.)

**URL:** https://dhub.deloitte.com/Newsletters/Tax/2023/TNV/231020\_2.html

In a previous July 2023 Outcome Statement, the OECD had expressed the view that "[t]he MLC will be opened in the second half of 2023 and a signing ceremony will be organised by year end, with the objective of enabling the MLC to enter into force in 2025, allowing for the domestic consultation, legislative, and administrative processes applicable in each jurisdiction."

**URL:** https://www.oecd.org/tax/beps/outcome-statement-on-the-two-pillar-solution-to-address-the-tax-challenges-arising-from-the-digitalisation-of-the-economy-july-2023.htm

The July Outcome Statement also explained that, subject to at least 30 jurisdictions accounting for at least 60 percent of the Ultimate Parent Entities (UPEs) of in-scope multinational entities (MNEs) signing the MLC before the end of 2023, members of the Inclusive Framework agreed to refrain from imposing newly enacted digital services taxes (DSTs) or relevant similar measures, as defined in the MLC, on any company between January 1, 2024, and the earlier of December 31, 2024, or the entry into force of the MLC. This represents a one-year extension of the current moratorium on such taxes, which was originally agreed to run through the end of 2023 unless the MLC came into force sooner. Given the ongoing negotiations and the fact that the MLC will not meet the target metrics for signatories before year-end, it remains an open question whether countries will agree to a continuation of the DST standstill. (It's worth noting that Canada appears intent on collecting its new DST beginning in 2024. For prior coverage, see *Tax News & Views*, Vol. 24, No. 31, Sep. 22, 2023.) URL: https://dhub.deloitte.com/Newsletters/Tax/2023/TNV/230922\_4.html

## **Public comments requested**

The Treasury Department announced a request for public comments on the Pillar One MLC and accompanying documents by December 11, 2023. Treasury Assistant Secretary for Tax Policy Lily Batchelder stated in the announcement that the release of the MLC and supporting documents is "a key step forward in the Pillar One negotiations," adding that the materials "reflect countless hours of discussions, across multiple US administrations, and among hundreds of negotiators."

Batchelder noted that "Treasury stands behind the negotiations, which have resulted in many difficult compromises by all sides with respect to both the design of the partial reallocation of taxing rights and the elimination of discriminatory digital services taxes and similar measures"; but she added that "Pillar One represents a uniquely significant reform to the international tax system" and "[b]ecause of the breadth and complexity of the changes proposed, we view public input as critical to our process—to ensure transparency, to facilitate the resolution of several remaining open issues, and to hear whether the proposed framework would be workable for US taxpayers and other stakeholders."

#### **Notable details**

The Pillar One MLC follows the contours of the Amount A discussions to date without notable departures, although there is surely more detail in these documents than was previously available in public. Among the items worthy of note:

• Issues around withholding tax at the source on royalties, technical fees/services, and interest that already allocates tax to market countries have been largely addressed with adjustments to minimize

- double taxation. Some open points remain under discussion, however, particularly on the adjustments for withholding taxes, and the text of the multilateral convention notes objections by India, Brazil, and Colombia in this regard.
- Amount A now includes a targeted exclusion for defense entities, which uses broadly the same
  approach as the exclusions for extractives and regulated financial services, as well as an exemption for
  "purely domestic-oriented" businesses.

For businesses within the scope of DSTs, there is a useful annex identifying the specific DST measures (including the UK DST and other European DSTs, plus the equalization levies in India) that will be withdrawn as part of the Amount A implementation. Signatories of the MLC will also commit not to introduce a DST or relevant similar measure in the future. A country that does so will not receive an allocation of Amount A tax.

#### Find out more

The relevant provisions of the Pillar One MLC are described in a new international tax alert from Deloitte Tax LLP.

URL: https://dhub.deloitte.com/Newsletters/Tax/2023/TNV/231103\_3\_suppA.pdf

Michael DeHoff
 Tax Policy Group
 Deloitte Tax LLP

# Deloitte Tax resources address implications of Pillar Two for global stock-based compensation, state and local taxes

Recently released resource guides from Deloitte Tax LLP discuss the ways in which Pillar Two of the international tax reform agreement being advanced through the OECD may affect decision-making around global stock-based compensation and state and local taxes.

#### Global stock-based compensation

Pillar Two dramatically increases the complexity and scope of tax accounting for multinational entities. As companies digest the new rules and weigh benefits of several elections, the planning considerations around stock-based compensation should be part of the conversation.

A new publication from Deloitte Tax provides an overview of Pillar Two and explains some of the opportunities and challenges that the emerging rules present for in-scope companies that offer global stock-based compensation programs.

**URL:** https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/us-tax-deloittes-take-on-pillar-two-and-global-stock-based-compensation.pdf

#### State and local taxes

The influence of Pillar Two extends far beyond international and US federal income taxes. Many state and local taxes are considered "covered taxes" within the Pillar Two framework, making state and local taxes an integral part of the overall Pillar Two analysis. This analysis typically involves taking an inventory of current state and local tax profiles, including policies and implications related to planning, tax reserves, credits, and incentives.

A new 5x5 resource guide from Deloitte Tax identifies five insights taxpayers need to know about how Pillar Two interacts with state and local taxes and five actions taxpayers can take now to prepare for prepare for its implementation.

**URL:** https://www2.deloitte.com/content/dam/Deloitte/us/Documents/Tax/us-tax-pillar-two-implications-for-state-and-local-taxes.pdf

Michael DeHoff
 Tax Policy Group
 Deloitte Tax LLP

# House taxwriters approve disaster-relief package

The House Ways and Means Committee approved legislation on November 2 that would temporarily relax various rules around the tax treatment of relief payments received by and casualty losses incurred by individuals who are victims of certain federally declared natural disasters.

## Highlights of tax relief provisions

The Federal Disaster Tax Relief Act, 2023 (H.R. 5863) cleared the panel by a vote of 38-0. The legislation was originally sponsored by Ways and Means Committee Republican Greg Steube of Florida, but Chairman Jason Smith, R-Mo., noted in his opening statement that California Democratic taxwriters Mike Thompson and Jimmy Panetta also have played key roles in advancing the issue of disaster-related tax relief in the committee.

URL: https://gop-waysandmeans.house.gov/wp-content/uploads/2023/11/AINS-to-H.R.-5863.pdf

The measure drew plaudits from taxwriters on both sides of the aisle at the mark-up, although Democrat Lloyd Doggett of Texas cautioned that until Congress is willing to address the larger issue of climate change, "there will come a time when even the massive resources of the federal government will be insufficient to provide complete relief to those who suffer from natural disasters made so much worse by unnatural causes."

Key provisions in the legislation are outlined below.

**Deduction for disaster-related personal casualty losses:** The measure would extend temporary taxpayer-favorable rules for deducting certain personal casualty losses related to major federally declared disasters that were last renewed in the Consolidated Appropriations Act, 2021 (P.L. 116-260) and are now expired. Thus,

individuals who incur uncompensated personal casualty losses in disasters declared during the period running from January 1, 2020, through 60 days after the date this legislation is signed into law would be allowed to deduct those losses (to the extent they exceed \$500 per casualty) without regard to the requirement that net aggregate disaster-related losses exceed 10 percent of adjusted gross income. Nonitemizers who incur disaster-related personal casualty losses in this period would be permitted to deduct those losses in addition to claiming the standard deduction.

URL: https://www.congress.gov/116/plaws/publ260/PLAW-116publ260.pdf

This provision would be effective upon enactment.

**Exclusion for certain wildfire relief payments:** The measure would provide an exclusion from gross income for amounts received as qualified wildfire relief payments. These are defined as any amount received by or on behalf of an individual as compensation for losses, expenses, or damages—including compensation for additional living expenses, lost wages (other than compensation for lost wages paid by the employer which would have otherwise paid such wages), personal injury, death, or emotional distress—incurred as a result of a qualified wildfire disaster, but only to the extent the losses, expenses, or damages compensated by such payment are not compensated for by insurance or otherwise.

A qualified wildfire disaster means any federally declared disaster (as defined in section 165(i)(5)(A)) declared, after December 31, 2014, as a result of any forest or range fire. Qualified wildfire relief payments would not include payments for any expenses or losses compensated for by insurance or otherwise.

The legislation also would provide that no deduction or credit is allowed with respect to any expenditure to the extent of the amount excluded with respect to the expenditure. The basis of any property would not be increased by amounts excluded from gross income under the proposal.

This provision would apply to qualified wildfire relief payments received during taxable years beginning after December 31, 2019, and before January 1, 2026.

Treatment of East Palestine disaster relief payments: The bill would treat payments received by individuals incurring damages or losses related to the train derailment in East Palestine, Ohio, on February 3, 2023, as qualified disaster relief payments for purposes of section 139(b) and therefore excludable from gross income and subject to other present-law provisions—such as excludability from employment taxes and self-employment taxes (section 139(d)) and the prohibition on double benefits (section 139(h))—that are applicable to qualified disaster relief payments.

This provision defines an East Palestine train derailment payment as any amount received by or on behalf of an individual as compensation for loss, damages, expenses, loss in real property value, closing costs with respect to real property (including realtor commissions), or inconvenience (including access to real property) resulting from the East Palestine train derailment if the amount was provided by a federal, state, or local government agency; Norfolk Southern Railway; or a subsidiary, insurer, or agent of Norfolk Southern Railway or any related person.

This relief would apply to applies to amounts received on or after February 3, 2023.

#### No revenue raisers

The bill as approved does not include revenue-raising provisions to offset the cost of the proposed tax relief. The Joint Committee on Taxation staff estimates the measure would decrease federal receipts by just over \$4.9 billion from 2024 through 2033.

**URL:** https://www.jct.gov/publications/2023/jcx-50-23/

Texas Democrat Lloyd Doggett criticized GOP members of the panel for not including offsets in the legislation, given the stated concerns within the House Republican Conference about the federal deficit.

With its nearly \$5 billion price tag, the bill represents "an expenditure through the tax code that is every bit as real as if the Appropriations Committee approved the handing out of checks to those who've been victims of these disasters," he said.

Doggett did not offer revenue offsets as amendments during the mark-up, however.

### **Next steps uncertain**

Plans for moving the legislation to the House floor have not yet been announced.

Michael DeHoff
 Tax Policy Group
 Deloitte Tax LLP

# IRS permanently allows use of e-signatures for select forms

The IRS announced on October 30 that certain tax forms can be signed with e-signatures instead of "wet" ink signatures, including Forms 1128, Forms 3115, Forms 8832, elections under section 83(b), and the Form 8453 series. Taxpayers must still hand sign all other forms. In addition, IRS personnel are permitted to accept e-signatures on certain documents when dealing with taxpayers during examinations, Appeals, and collection.

**URL:** https://www.irs.gov/newsroom/irs-extends-popular-flexibilities-set-to-expire-electronic-signatures-and-encrypted-email-enhance-the-taxpayer-experience

**URL:** https://www.irs.gov/pub/irs-pdf/f1128.pdf **URL:** https://www.irs.gov/pub/irs-pdf/f3115.pdf **URL:** https://www.irs.gov/pub/irs-pdf/f8832.pdf

URL: https://www.taxnotes.com/research/federal/usc26/83

**URL:** https://www.irs.gov/pub/irs-pdf/f8453.pdf

Before the COVID-19 pandemic, the IRS required "wet" ink signatures on most forms and documents. When it became difficult to obtain handwritten signatures in the COVID-19 environment, the IRS temporarily allowed

taxpayers and representatives to use e-signatures on certain forms and documents in examinations, Appeals, and collection. The temporary relief was set to expire on October 31, 2023.

This week's announcement from the IRS makes the relief permanent for certain forms and documents.

The IRS also had allowed employees to receive and send encrypted documents by e-mail. That relief has been extended by separate interim guidance through October 31, 2025.

**URL:** https://www.irs.gov/pub/foia/ig/spder/pgld-10-1023-0002-10262023.pdf

#### Find out more

A new alert from Deloitte Tax LLP discusses the forms that may be filed using electronic signatures and the requirements for legally binding digital signatures.

URL: https://dhub.deloitte.com/Newsletters/Tax/2023/TNV/231103 6 suppA.pdf

Michael DeHoff
 Tax Policy Group
 Deloitte Tax LLP

# Finance Committee schedules hearing on high-income individuals, tax planning, and the federal tax code

The Senate Finance Committee announced this week that it will hold a hearing on November 9 at 10:00 a.m. to examine "how the tax code affects high-income individuals and tax planning strategies."

Witnesses as of press time include Chye-Ching Huang of the New York University School of Law, Morris Pearl of Patriotic Millionaires, William McBride of the Tax Foundation, and Douglas Holtz-Eakin of the American Action Forum.

Michael DeHoff
 Tax Policy Group
 Deloitte Tax LLP

## Blumenauer to retire after 2024

House Ways and Means Committee Democrat Earl Blumenauer of Oregon announced this week that he will not run for re-election in 2024 and will retire from Congress at the end of his current term.

Blumenauer was first elected to the House in 1996 and joined the Ways and Means Committee in 2007. He is currently ranking member of the Ways and Means Trade Subcommittee and chaired the panel in the 116th and 117th Congresses when Democrats held the majority. He also has a seat on the Health Subcommittee in the current Congress.

In addition to his focus on trade, Blumenauer has championed health care and environmental issues—including clean-energy provisions that were incorporated into last year's Inflation Reduction Act (P.L. 117-169)—and has fought for federal tax benefits for bicycle commuters.

URL: https://www.congress.gov/117/plaws/publ169/PLAW-117publ169.pdf

In a news release, Ways and Means ranking member Richard Neal, D-Mass., lauded Blumenauer for leading "the Ways and Means Trade Subcommittee through tremendous triumphs, never shying away from holding administrations, corporations, and trading partners accountable. He has shone a light on the use of forced labor worldwide and helped bolster US enforcement efforts to end these abusive practices. As a climate leader, Earl guided the single largest investment in combating the climate crisis in our nation's history with many of the Inflation Reduction Act's historic provisions."

Michael DeHoff
 Tax Policy Group
 Deloitte Tax LLP

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organization") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and independent entities.

#### **About Deloitte**

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide services to clients. Please see www.deloitte.com/about to learn more.

Deloitte provides industry-leading audit and assurance, tax and legal, consulting, financial advisory, and risk advisory services to nearly 90% of the Fortune Global 500® and thousands of private companies. Our professionals deliver measurable and lasting results that help reinforce public trust in capital markets, enable clients to transform and thrive, and lead the way toward a stronger economy, a more equitable society and a sustainable world. Building on its 175-plus year history, Deloitte spans more than 150 countries and territories. Learn how Deloitte's approximately 415,000 people worldwide make an impact that matters at www.deloitte.com.