

National Tax Association





106th Annual Conference on Taxation

CONFERENCE CHAIR: Diane Lim, President, **National Tax Association**

PROGRAM CHAIRS: Tracy Gordon, Brookings Institution

Daniel Shaviro, New York University School of Law

PROGRAM

REGISTRATION — AUDUBON FOYER

Wednesday, November 20, (3:00 PM - 7:00 PM)

Thursday, November 21, (7:30 AM - 5:00 PM)

Friday, November 22, (8:00 AM - 3:00 PM)

Program at a Glance

THURSDAY, NOVEMBER 21

GENERAL SESSION 8:30 - 10:00 AM

Pathways to Tax Reform

COFFEE BREAK 10:00 - 10:15 AM

CONCURRENT SESSIONS 10:15-11:45 AM

Nineteenth and Twentieth Century Tax History The Political Economy of State and Local Funding

Corporate Taxation: Behavioral Effects

Fiscal Decentralization and Local Government Finance Reforms:

Cases from Developing Countries

Do Retirement Savers React to Changing Tax Rules

Behavioral Incentives, Tax Compliance, and Choice of Policy Instruments

LUNCHEON NOON - 1:30 PM

Speaker: Peter Orszag, Vice Chairman of Global Banking, Citicorp

CONCURRENT SESSIONS 1:45 - 3:15 PM

Property Taxes in the Great Recession and Beyond

Enforcement, Evasion, and Reporting

Empirical Studies of the Nonprofit Sector

Risk, Tax Policy, and Entrepreneurship

Tax Responsiveness of Older Workers

Fiscal Decentralization and Local Government Finance Reforms:

A Comparative Perspective

NTA: The Next Generation

COFFEE BREAK 3:15 - 3:30 PM

CONCURRENT SESSIONS 3:30 - 5:00 PM

Achieving the Local Public Good

State Tax Policy and Economic Growth

Payroll Taxes and Tax Reform

Corporate Taxation and Tax History

International Tax: Repatriation and Expatriation

Employment, Marriage, and the Earned Income Tax Credit

5:00 - 6:00 PM

National Tax Association Annual Meeting

Presidential Address, Diane Lim

Presentation of Awards: Dissertation Award Winners

RECEPTION 6:15 - 7:15 PM

FRIDAY, NOVEMBER 22

CONCURRENT SESSIONS 8:30 – 10:00 AM

State and Local Development Incentives Under the Microscope

Optimal Policy and Real People

We're All in This Together: National, State, and Local Interrelationships

among Economies and Budgets

Formulary Approaches to International Taxation

Abusive Tax Planning, Tax Aggressiveness, and Tax Penalties

Local Fiscal Sustainability and Pensions

Taxes, Changing Taxes, and Distribution

COFFEE BREAK 10:00 - 10:15 AM

CONCURRENT SESSIONS 10:15 - 11:45 AM

Anything You Can Do I Can Do Better: Tax Competition and Location Choice

The Big Picture: Major Reforms and Tax Policy Discourse

Interacting Federal and State Taxes

Business Taxation: Managerial Incentives and Investment Decisions

Efficiency, Distribution, and the Design of Fundamental Tax Reform

Toward a Deeper Understanding of Tax Salience

LUNCHEON NOON - 1:30 PM

Speaker: Raj Chetty, Professor of Economics, Harvard University, Winner 2013 John Bates Clark Medal of The American Economic Association

The Student Research Forum Posters on Display in Registration Area

1:30 - 1:45 PM

CONCURRENT SESSIONS 1:45 - 3:15 PM

Research Using New IRS Administrative Tax Return Data

Fiscal Policy Challenges Due to Macroeconomic Imbalance and Changing

Dynamics of Fiscal Federalism

Incidence and Enforcement of Federal, State, and Local Corporate Taxes

Health Policy

Papers from the DC Tax Revision Commission

State and Local Tax Policy: Alternative Frameworks of Analysis

Frontiers of Public Finance: 2013 NTA Outstanding Doctoral Dissertation

Award Winners

COFFEE BREAK 3:15 - 3:30 PM

GENERAL SESSION 3:30 - 5:00 PM

In Honor of Michael Graetz, 2013 Holland Award Recipient

The Student Research Forum Posters on Display in Registration Area

5:00 - 5:30 PM

RECEPTION 5:15 - 6:15 PM

In Honor of Michael Graetz, 2013 Holland Award Recipient

SATURDAY, NOVEMBER 23

CONCURRENT SESSIONS 8:30 – 10:00 AM

Tax Policy: Empirical Evidence of Unintended Consequences

Local Fiscal Policy and Budget Stabilization over the Business Cycle

Behavioral Responses to Taxation

Targeted Aid: Education and Empowerment Zone

The Compliance Costs of Taxation; Some International Evidence

The Impact of Legalized Lottery and Casino Gaming and Implications for

State and Local Revenues

COFFEE BREAK 10:00 - 10:15 AM

CONCURRENT SESSIONS 10:15 – 11:45 AM

Infrastructure and Municipal Bonds

The Fiscal Policy Space of Cities

Laboratory Experiments in Public Finance

Taxing Cross-Border Income

Local Sales Taxes: Who Levies, Who Pays, and How Much Pyramiding?

Housing Bubbles, Location-Based Taxes, and Metropolitan Housing

THURSDAY, NOVEMBER 21

GENERAL SESSION 8:30 - 10:00 AM

PATHWAYS TO TAX REFORM

LOCATION: AUDUBON DEF

Organizer: James Nunns, Urban-Brookings Tax Policy Center

Moderator: William Gale, Brookings Institution

Progressive Consumption Taxation: The X Tax Revisited, *Robert Carroll*, Ernst and Young LLP and *Alan Viard*, American Enterprise Institute

The Bipartisan Policy Center Tax Reform Plan, *Leonard Burman*, Urban-

Brookings Tax Policy Center

A VAT as the Linchpin For Fundamental Tax Reform, *Michael Graetz*, Columbia University Law School

Discussant: Pam Olson, PricewaterhouseCoopers

COFFEE BREAK 10:00 – 10:15 AM AUDUBON FOYER

CONCURRENT SESSIONS 10:15 - 11:45 AM

NINETEENTH AND TWENTIETH CENTURY TAX HISTORY

LOCATION: AUDUBON B

Organizer/Moderator: *Joseph Thorndike,* Tax Analysts
Who Invented the Single Tax Principle? An Essay of the History of U.S.
Treaty Policy, *Reuven Avi-Yonah*, University of Michigan

The Almost-Restatement of Income Tax of 1954: When Tax Giants Roamed the Earth, *Larry Zelenak*, Duke University School of Law

The First National Income Tax, 1861–1872, Sheldon Pollack, University of Delaware

Discussant: Joseph Thorndike, Tax Analysts

THE POLITICAL ECONOMY OF STATE AND LOCAL FUNDING

LOCATION: AUDUBON C

Organizer/Moderator: *Eric Brunner*, Georgia State University
The Parcel Tax and the Price of Public School Quality, *Bree Lang*, Xavier
University and *Jon Sonstelie*, University of California, Santa Barbara

The Political Economy of Education Finance: The Case of Texas, *Larry Kenny*, University of Florida

Homeowners, Renters and the Political Economy Of Property Taxation, Eric Brunner, Georgia State University, Stephen Ross, University of Connecticut and Becky Simonsen, Columbia University

Are Property Taxes and Impact Fees Sufficient to Produce Optimal Suburban Densities?, *William Fischel*, Dartmouth College

Discussants: Kim Rueben, Urban-Brookings Tax Policy Center, Robert Buschman, Georgia State University, Andrew Reschovsky, Lincoln Institute of Land Policy and Nathan Anderson, Northwestern University

CORPORATE TAXATION: BEHAVIORAL EFFECTS

LOCATION: WHITE IBIS

Organizer/Moderator: Rudolf de Mooij, International Monetary Fund Taxation and Corporate Leverage: The Difference between Banks and Non-Banks, Ruud de Mooij, International Monetary Fund

The Rise of Sub-S Banks and the Resulting Fall of Corporate Tax Revenues, *Edith Brashares* and *Michael Stevens*, U.S. Department of the Treasury

Do Multinational Firms Use Complex Group Structures to Facilitate Income Shifting and Repatriation?, *Tim Wagener* and *Christoph Watrin*, University of Münster

Characteristics Of New Businesses Versus Small Businesses and the Use of Tax Preferences, *John McClelland* and *Richard Prisinzano*, U.S. Department of the Treasury

Discussants: Juan Carlos Suárez Serrato, Stanford University, Dhammika Dharmapala, University of Illinois at Urbana-Champaign, Tim Wagener, University of Münster, Rudolf de Mooij, International Monetary Fund

FISCAL DECENTRALIZATION AND LOCAL GOVERNMENT FINANCE REFORMS: CASES FROM DEVELOPING COUNTRIES

LOCATION: AUDUBON D

Organizer/Moderator: Paul Smoke, New York University
Efficiency Cost of Fiscal Equalization: The Case of Belarus, Sebastian
Eckardt, World Bank, Jorge Martinez-Vazquez and Andrey Timofeev,
Georgia State University

Fiscal Decentralization, Local Borrowing and Growth in Turkish Provinces, *Mehmet Tosun*, University of Nevada-Reno, *Dilek Uz*, University of California, Berkeley and *Serdar Yilmaz* World Bank

Funding Follows Function: Vertical and Horizontal Sharing Under Devolution in Kenya, *Kathy Whimp*, World Bank

Discussant: François Vaillancourt, Universite de Montreal

DO RETIREMENT SAVERS REACT TO CHANGING TAX RULES

LOCATION: AUDUBONE

Organizer/Moderator: Peter Brady, Investment Company Institute
Do Required Minimum Distributions Constrain Household Behavior?
The Effect of the 2009 RMD Suspension on Retirement Savings Distributions, Jeffrey Brown, University of Illinois Urbana-Champaign,
James Poterba, MIT and David Richardson, TIAA-CREF Institute

Do IRA Investors Respond to Changes in Tax Law, *Steven Bass, Sarah Holden* and *Daniel Schrass*, Investment Company Institute

Recent Trends in Pension and IRA Distributions Reported On Form 1040: What Can We Learn from Information Returns?, *Peter Brady*, Investment Company Institute and *Kevin Pierce*, Internal Revenue Service

Discussants: Jean Young, Vanguard and Gary Koenig, AARP Public Policy

BEHAVIORAL INCENTIVES, TAX COMPLIANCE, AND CHOICE OF POLICY INSTRUMENTS

LOCATION: AUDUBON F

Organizer/Moderator: Jacob Goldin, Princeton University
Microdeterrence, Leigh Osofsky, University of Miami
On Double-Distortion Arguments, Distribution Policy, and the Optimal
Tax Mix, David Gamage, University of California, Berkeley
Regulation from the Inside Out: Nudges and Price Instrument Theory
for Internalities and Externalities, Brian Galle, Boston College
In Defense of Tax Priority, Shu-Yi Oei, Tulane Law School

Discussants: *Kirk Stark,* of UCLA Law School and *Joel Slemrod*, University of Michigan, Ann Arbor

■ LUNCHEON NOON – 1:30 PM AUDUBON A

SPEAKER: PETER ORSZAG, VICE CHAIRMAN OF GLOBAL BANKING, CITICORP

CONCURRENT SESSIONS 1:45 – 3:15 PM

PROPERTY TAXES IN THE GREAT RECESSION AND BEYOND

LOCATION: AUDUBON B

Organizer/Moderator: *John Mikesell,* Indiana University Assessment Limits and Timing of Real Estate Transactions, *Seba*:

Assessment Limits and Timing of Real Estate Transactions, Sebastien

Bradley, Drexel University

Structural/Institutional Determinants of Variations in Household Property Tax Burdens and Effective Tax Rates Within and Across Local Governments: The Effect of the Great Recession and Beyond, *John Mikesell*, Indiana University and *Daniel Mullins*, American University

Property Tax Delinquencies and Local Revenue Volatility During the Great Recession, *Olha Krupa*, Seattle University

The Public Financing of America's Largest Cities: An Autopsy of City Financial Records in the Wake of the Great Recession, *Justin Ross, Wenli Yan* and *Craig Johnson*, Indiana University

Discussants: *Molly Sherlock,* Congressional Research Service, *William Fischel,* Dartmouth College

PAYROLL TAXES AND TAX REFORM

LOCATION: WHITE IBIS

Organizer/Moderator: Leonard Burman, Urban-Brookings Tax Policy Center

Broadening the Employer Payroll Tax Base to a Consumption Tax Base, James Nunns and Joseph Rosenberg, Urban-Brookings Tax Policy Center Distributional Effects of Including Employer-Sponsored Health Insur-

ance Premiums in the Payroll Tax Base, Eric Toder, Urban-Brookings

Tax Policy Center

Labor and Capital Income in the Self-Employment Tax Base, Paul Burnham, Congressional Budget Office

Discussants: Peter Merrill, PricewaterhouseCoopers, Janet Holtzblatt, Congressional Budget Office, and James Alm, Tulane University

CORPORATE TAXATION AND TAX HISTORY

LOCATION: AUDUBON E

Organizer/Moderator: Steven Bank, UCLA School of Law When We Taxed the Pyramids, Steven Bank, UCLA School of Law Comparative History of the Immediate Expensing Rule, Mirit Eyal-Cohen, University of Pittsburgh

"Trafficking" in Loss Corporations: The Dynamics of Public-Private Corporate Tax Administration, 1954–1962, Sloan Speck, New York University

Discussant: Sheldon Pollack, University of Delaware

INTERNATIONAL TAX: REPATRIATION AND EXPATRIATION **LOCATION: AUDUBON C**

Organizer/Moderator: Dhammika Dharmapala, University of Illinois at Urbana-Champaign

Investor Responses to Dividends Received Deductions: Rewarding Multinational Tax Avoidance?, Sebastien Bradley, Drexel University

Investor Valuations of Japan's Adoption of a Territorial Tax Regime: Quantifying the Direct and Competitive Effects of International Tax Reform, Estelle Dauchy, New Economic School, Sebastien Bradley, Drexel University, and Makoto Hasegawa University of Michigan,

The Effect of Moving to a Territorial Tax System on Profit Repatriations: Evidence from Japan, Makoto Hasegawa University of Michigan, Ann Arbor and Kozo Kiyota, Yokohama National University

"Looking Through" Corporate Expatriations for Buried Intangibles, Elizabeth Chorvat, University of Chicago

Discussants: Dhammika Dharmapala, University of Illinois at Urbana-Champaign and Kevin Markle, University of Waterloo

EMPLOYMENT, MARRIAGE AND THE EARNED INCOME TAX CREDIT LOCATION: AUDUBON F

Organizer/Moderator: Katie Fitzpatrick, Seattle University Income Changes During Unemployment: Further Evidence from Tax Return Data, Laura Kawano, U.S. Department of the Treasury and Sara LaLumia, Williams College

The Impact of Maternal Employment on Youth Crime: Evidence from the Earned Income Tax Credit, Katie Fitzpatrick, Seattle University and Andrew Hanson, Marquette University

The EITC and Employment of People with Disabilities, Reagan Baughman and Andrew Houtenville, University of New Hampshire

Labor Force Participation Elasticities of Women and Secondary Earners within Married Couples, Robert McClelland, Shannon Mok, Congressional Budget Office, and Kevin Pierce, Internal Revenue Service

Discussants: Caroline Weber, University of Oregon and Samara Gunter, Colby College

GENERAL SESSION 5:00 - 6:00 PM

LOCATION: AUDUBON DEF

ANNUAL MEETING OF THE NATIONAL TAX ASSOCIATION PRESIDENTIAL ADDRESS, Diane Lim, Pew Charitable Trusts

PRESENTATION OF THE 2013 NTA OUTSTANDING DOCTORAL **DISSERTATION AWARD WINNERS**



(BACK UP AUDUBON A)

FRIDAY, NOVEMBER 22

CONCURRENT SESSIONS 8:30 – 10:00 AM

STATE AND LOCAL DEVELOPMENT INCENTIVES UNDER THE MICROSCOPE

LOCATION: AUDUBON E

Organizer/Moderator: Cynthia Rogers, University of Oklahoma Jobless Capital? The Role of Capital Subsidies, Carlianne Patrick, Georgia State University

Evaluating Tax Incentives: Measuring Results, Informing Policy, Brandon Brockmyer, Jeff Chapman, Josh Goodman, Julie Srey, Will Wilson and Robert Zahradnik, Pew Charitable Trusts

Accountability for Economic Development Incentives: The Case for a Procedural Duty of Care, Stephen Ellis and Cynthia Rogers, University of Oklahoma and Grant Hayden, Hofstra University

Spatial Determinants of Economic Activity in the District of Columbia, Marvin Ward Jr., Jeffrey Oakman, Lindsay Clark and Brian Kirrane, DC Office of the Chief Financial Officer

Discussants: Marvin Ward, Jr, Office of Revenue Analysis, District of Columbia, Cynthia Rogers, University of Oklahoma, Brandon Brockmyer, Pew Center on the States Trust, Trey Trosper, University of Oklahoma

OPTIMAL POLICY AND REAL PEOPLE

LOCATION: AUDUBON D

Organizer/Moderator: *Matthew Weinzierl*, Harvard Business School Misperceptions of the Social Security Earnings Test, Alexander Gelber, University of California, Berkeley, and NBER, Damon Jones, University of Chicago and Daniel Sacks, The Wharton School, University of Pennsylvania

Happy Taxpayers? Income Taxation and Well-Being, Alpaslan Akay, IZA - Institute for the Study of Labor, Olivier Bargain, Mathias Dolls, Dirk Neumann, Andreas Peichl and Sebastian Siegloch, IZA - Institute for the Study of Labor

A New (Very Old) Approach to Benefits-Based Taxation, Matthew Weinzierl, Harvard Business School

Taxes, Subsidies, and Obesity: A Dynamic Approach, Nathalie Mathieu-Bolh, University of Vermont and Christiane Schroeter, California Polytechnic State University

Discussants: Joel Slemrod, University of Michigan, Ann Arbor and Alexander Gelber, The Wharton School, University of Pennsylvania, and NBER, Andreas Peichl, IZA - Institute for the Study of Labor, and Benjamin B. Lockwood, Harvard University

WE'RE ALL IN THIS TOGETHER: NATIONAL, STATE, AND LOCAL **INTERRELATIONSHIPS AMONG ECONOMIES AND BUDGETS**

LOCATION: WHITE IBIS

Organizer/Moderator: Diane Lim, Pew Charitable Trusts Understanding the Interrelationships between and among National-State-and Local-Level Economies and Fiscal Policies, Diane Lim, Pew Charitable Trusts

Harnessing Economic and Revenue Volatility to Enhance State Fiscal Health, Meghan Atwell, Brenna Erford, Stephen Fehr, Liz Gross, Alicia Mazzara, Aidan Russell and Robert Zahradnik, Pew Charitable Trusts

Federal Actions: State Consequences. The Many and Varied Links in Federal and State Fiscal Policies and the Impacts on States of Federal Changes, Kasia O'Neill Murray, Phil Oliff, Ethan Pollack and Mark Robyn, Pew Charitable Trusts

How America's Big Cities Managed Tough Volatile Times: Meeting Fiscal Challenges and Preparing For the Future, Alyssa Lee, Michael Levine, Mary Murphy, Sergio Ritacco, Matt Separa and Robert Zahradnik, Pew Charitable Trusts

Discussants: Tom Woodward, Woodward Farm, Lori Metcalf, DC Office of Tax and Revenue, and Ranjana Madhusudhan, Department of Treasury