How Closely Do Business Taxes Conform to the Benefits Principle?

Richard H. Mattoon and William A. Testa

Federal Reserve Bank of Chicago

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Context

- GRT's have emerged from the dead. Ohio, Texas have recently adopted GRTs and Illinois had major GRT proposal. Why the sudden popularity?
- Larger issue—the growing difficulty of taxing business. Traditional structures fail to capture revenue from new business forms such as LLPs and and S corps.
- Philosophical issue—how should we tax business? What tax principles should guide the discussion?

What should guide business taxation?

- Benefits principle would seem to be best candidate (Oakland and Testa).
- Businesses should pay based on the benefits they receive for public services (or for their social costs). (User charges preferable)
- Can you really tax business rents or export the burden? If not, over-taxing business leads to poor public choices...may over-consume government services since voters don't think they are paying for them
- Salutary effects on current development policy?
- Current evidence suggests state and local business taxation is significantly too high

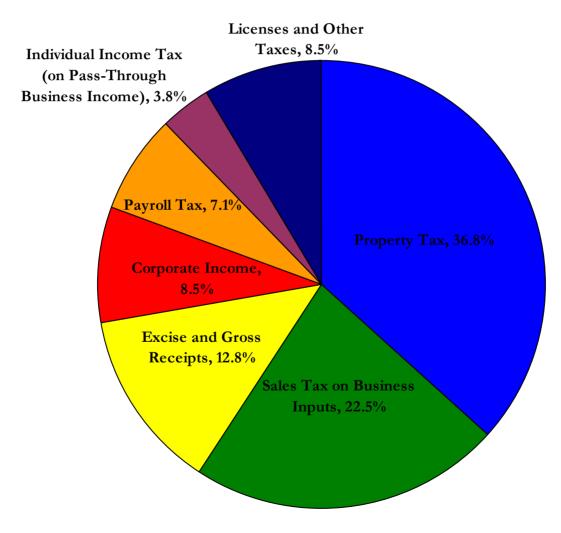
State & local business taxes in the United States, 2005

| | Total (\$ billions) | Percent of business | Percent of total state-local taxes |
|---|---------------------|------------------------|------------------------------------|
| Property Tax | \$182.8 | 36.7 | 16.0 |
| Sales Tax on Business Inputs | \$111.7 | 22.5 | 9.8 |
| Excise and Gross Receipts | \$63.7 | 12.8 | 5.6 |
| Corporate Income | \$42.1 | 8.5 | 3.7 |
| Unemployment Insurance Tax | \$35.5 | 7.1 | 3.1 |
| Individual Income Tax (on Pass-Through Business Income) | \$19.1 | 3.8 | 1.7 |
| Licenses and Other Taxes | \$42.5 | 8.5 | 3.7 |
| Total Business Taxes | \$497.4 | 100.0 | 43.6 |
| Total Taxes | \$1140.6 | | |

Source: Ernst & Young

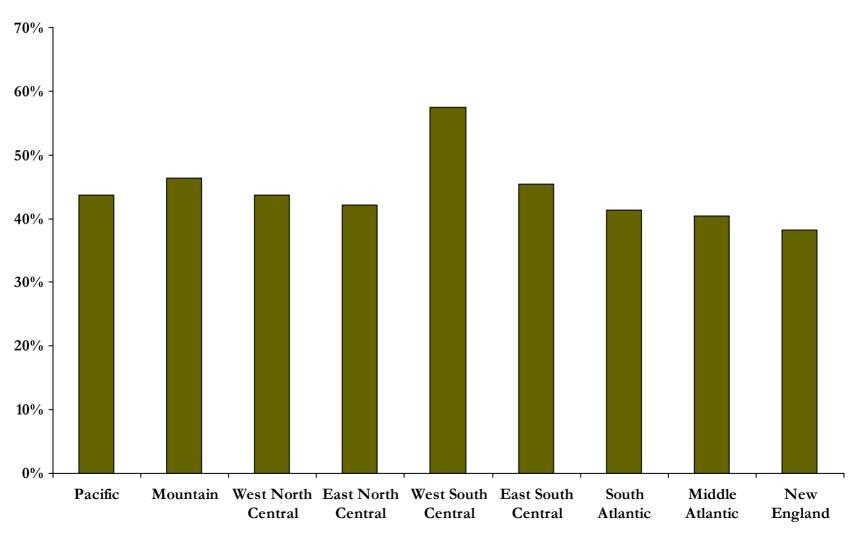
• Business taxes fall heavily on capital returns and investment

Composition of business taxes U.S. 2005



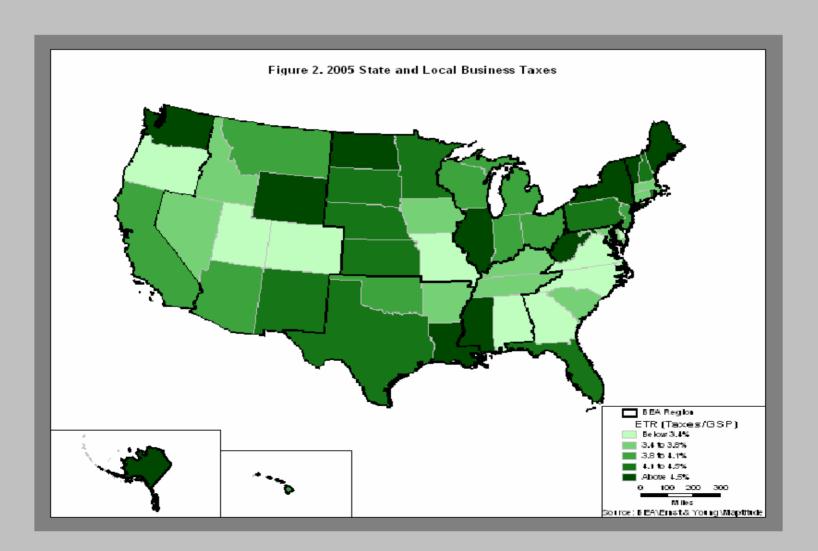
Source: Ernst & Young

Business Share of Total Taxes BEA Regions 2005



Source: Ernst & Young

Estimated tax rates for a hypothetical single tax on economic activity(S/L Business taxes/GSP)



Crude estimates of benefit principle in business taxation and state-local expenditure

- How much does state-local government currently spend on unpriced inputs to production?
- How do these expenditures compare to current business taxation?

Methodology for estimating tax-funded expenditure

In estimating "business expenditures," we would want to exclude those expenditures already funded by user fees and by the federal government.

Step 1: Deriving tax-funded expenditures



Step 2: Parsing expenditures to the household versus business sector

Result from step 1: Tax-funded state-local expenditures to be allocated to businesses and households, FY 2005

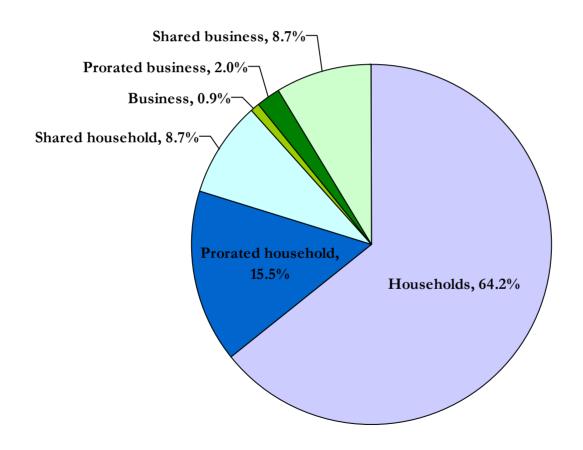
| Spending category | Total (\$ millions) | Share of Total (percent) | | | |
|--|---------------------|--------------------------|--|--|--|
| Education | 512,189 | 42.24 | | | |
| Libraries | 7,078 | 0.58 | | | |
| Housing and community development | 4,949 | 0.41 | | | |
| Natural resources (fish + forestry) | 3,961 | 0.33 | | | |
| Natural resources n.e.c. | 10,951 | 0.90 | | | |
| Parks and recreation | 19,820 | 1.63 | | | |
| Sewage | 3,220 | 0.27 | | | |
| Solid waste management | 7,207 | 0.59 | | | |
| All other and unallocable | 17,141 | 1.41 | | | |
| General interest on debt | 76,823 | 6.34 | | | |
| Financial administration | 32,808 | 2.71 | | | |
| General public buildings | 10,300 | 0.85 | | | |
| Judicial | 33,194 | 2.74 | | | |
| Other government administration (L+CS) | 18,273 | 1.51 | | | |
| Corrections | 57,764 | 4.76 | | | |
| Fire protection | 23,445 | 1.93 | | | |
| Police | 62,529 | 5.16 | | | |
| Protective inspection and regulation | 11,824 | 0.98 | | | |
| Health | 40,777 | 3.36 | | | |
| Hospital | 23,728 | 1.96 | | | |
| Veteran services | 1,349 | 0.11 | | | |
| Welfare | 134,559 | 11.10 | | | |
| Air transportation | 876 | 0.07 | | | |
| Highways | 67,775 | 5.59 | | | |
| Parking | -196 | -0.02 | | | |
| Water transport | 493 | 0.04 | | | |
| Unemployment insurance | 29,816 | 2.46 | | | |
| Total | 1,212,652 | 100.00 | | | |

Source: Census Bureau

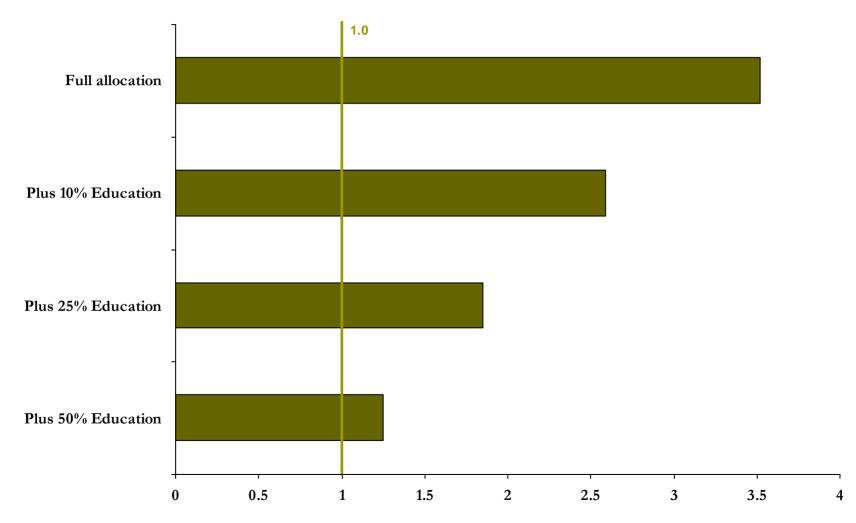
Step 2: Census Expenditure Categories as Allocated (Summary)

| Households | Business | Shared | Pro-rated |
|--|--------------------------|---|---|
| Education | Natural resources n.e.c. | Sewage | All other and unallocable |
| Libraries | Water transport | Solid waste management | General interest on debt |
| Housing and community development | | Judicial | Financial administration |
| Parks and recreation | | Fire protection | General public buildings |
| Natural resources (fish + forestry) | | Protective inspection and regulation | Other government administration (legislative + central staff) |
| Health | | Police | Corrections |
| Hospital | | Air transportation | |
| Veteran services | | Highways | |
| Welfare | | Parking | |
| Unemployment insurance | | | |

Distribution of state and local expenditures U.S. 2005



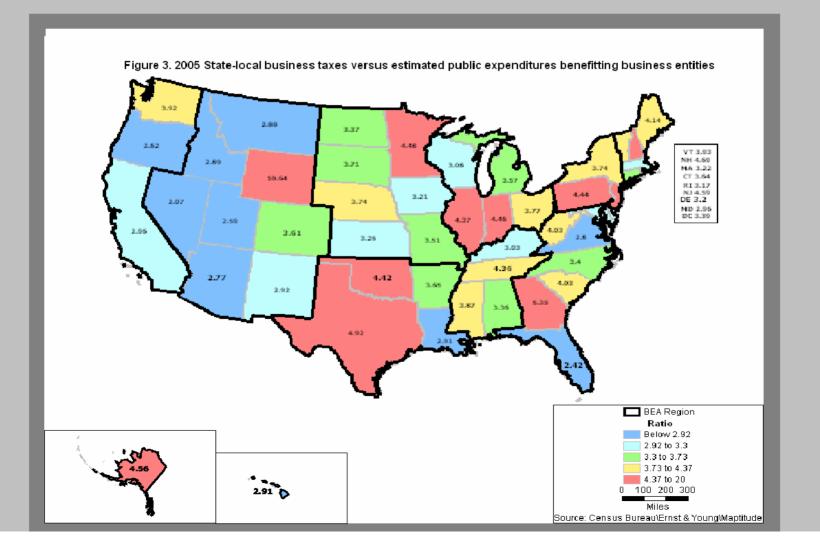
Result: Ratio of Business Taxes to Business Expenditures– U.S. Average



Business Tax/Benefit by State 2005 (ranked)

| | | | | | v | Vyoming (10. | 6) | 2 | | Missouri | (3.5) | | | | | | |
|---|---------------------|---------|----------------|-------|----|--------------|----|------------|---------------|--------------------|--------------|---|----|----|----|--|--|
| | | | Georgia | (5.4) | | | - | 45- 72- | | | rolina (3.4) | | | | | | |
| | | | Texas (4.9) | | | | | | | | Columbia | | | | | | |
| | New Hampshire (4.7) | | | | | | | | | North Dakota (3.4) | | | | | | | |
| | New Jersey (4.6) | | | | | | | | Alabama (3.4) | | | | | | | | |
| | | Al | aska (4.6) | | | | | 47 | | Kansas (3 | | | | | | | |
| - | | Mi | nnesota (4. | 5) | | | | | | | setts (3.2) | | | | | | |
| | | Inc | diana (4.5) | | | | | | | Iowa (3.2) | | | | | | | |
| | | Pe | nnsylva nia | (4.4) | | | | | | Delaware | | | | | | | |
| 1 | | Ok | lahoma (4.4 | +) | | | | | | Rhode Isla | | | | | | | |
| | | Illin | iois (4.4) | | | | | | | Wisconsin | | | | | | | |
| | | Ter | nnessee (4. | 4) | | | | - | | Kentucky (3 | | | | | | | |
| | | Ma in | e (4.1) | | | | | | | Maryland (3 | | | | | | | |
| | | Sout | h Carolina (| 4.0) | | | | | | | | | | | | | |
| | | West | : Virginia (4. | .0) | | | | | | California (3 | | | | | | | |
| | | Verme | ont (3.9) | | | | | - | | New Mexico | | | | | | | |
| | | Wash | ington (3.9) |) | | | | - | 1000 | Louisiana (2 | | | | | | | |
| | | Missis | sippi (3.9) | | | | | _ | | Hawaii (2.9) | | | | | | | |
| | | Ohio (| 3.8) | | | | | - | | daho (2.9) | | | | | | | |
| | | New Yo | ork (3.7) | | | | | | | Montana (2. | | | | | | | |
| | | | ska (3.7) | | | | | | | firginia (2.8) | | | | | | | |
| | | | Dakota (3.7 |) | | | | | | rizona (2.8) | | | | | | | |
| | | | as (3.7) | | | | | 24 | - | regon (2.6) | | | | | | | |
| | | | ticut (3.6) | | | | | 45 | | ah (2.6) | | | | | | | |
| | | Colorad | lo (3.6) | | | | | | | rida (2.4) | | | | | | | |
| | | Michiga | n (3.6) | | | | | | Neva | da (2.1) | | | | | | | |
| 0 | 2 | 4 | 6 | 8 | 10 | 12 | 14 | 0 | 2 | 4 | 6 | 8 | 10 | 12 | 14 | | |

Map of taxes levied vs benefits received



Conclusion

- States are trying to find appropriate tax structures for a shifting economy—particularly taxing services, and are turning to what look like "business taxes"
- The current structure of business taxation is skewed toward capital returns and usage; they do not fare well against a benefits principle yardstick
- VAT-type business tax approach would be the better option, particularly if the rates are set based on benefits received...
- Based on benefits principle estimates of current business taxation, income and consumption taxes should be considered to fund state-local spending