

103^D CONGRESS
1ST SESSION

H. R. 1862

To amend the Internal Revenue Code of 1986 to provide tax relief to families with young children.

IN THE HOUSE OF REPRESENTATIVES

APRIL 26, 1993

Mr. TORRICELLI introduced the following bill; which was referred to the Committee on Ways and Means

A BILL

To amend the Internal Revenue Code of 1986 to provide tax relief to families with young children.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 That (a) subsection (d) of section 151 of the Internal Rev-
4 enue Code of 1986 (relating to exemption amount) is
5 amended by adding at the end thereof the following new
6 paragraphs:

7 “(5) INCREASE IN EXEMPTION AMOUNT FOR
8 CERTAIN YOUNG CHILDREN.—

9 “(A) IN GENERAL.—In the case of a de-
10 pendent of the taxpayer who is a qualified child,

1 the exemption amount shall be twice the
2 amount which would otherwise have been deter-
3 mined under this subsection.

4 “(B) QUALIFIED CHILD.—For purposes of
5 this paragraph, the term ‘qualified child’ means
6 any child (as defined in subsection (c)(3)) of
7 the taxpayer if—

8 “(i) such child has not attained age 7
9 before the close of the taxable year, and

10 “(ii) the taxpayer elects to treat such
11 child as a qualified child under this para-
12 graph for such taxable year.

13 “(6) RECAPTURE RULES.—

14 “(A) IN GENERAL.—If the taxpayer made
15 an election under paragraph (5)(B) with respect
16 to any child for 1 or more taxable years, the tax
17 imposed by this chapter on such taxpayer for
18 each taxable year in the recapture period for
19 such child shall be increased by an amount
20 equal to—

21 “(i) the recapture amount with re-
22 spect to such child, divided by

23 “(ii) the number of taxable years in
24 the recapture period.

1 “(B) RECAPTURE PERIOD.—For purposes
2 of this paragraph, the recapture period for any
3 child is the period of consecutive taxable
4 years—

5 “(i) which begins with the taxable
6 year in which the child attains age 7, and

7 “(ii) which consists of a number of
8 taxable years equal to two times the num-
9 ber of taxable years for which the child
10 was treated as a qualified child under
11 paragraph (5).

12 “(C) RECAPTURE AMOUNT.—For purposes
13 of this paragraph, the recapture amount with
14 respect to any child is the aggregate decrease in
15 the taxpayer’s tax under this chapter for prior
16 taxable years by reason of treating such child
17 as a qualified child under paragraph (5).

18 “(D) SPECIAL RULE.—Any increase in tax
19 under this paragraph shall not be treated as a
20 tax imposed by this chapter for purposes of—

21 “(i) determining the amount of any
22 credit allowable under this chapter, and

23 “(ii) determining the amount of the
24 minimum tax imposed by section 55.”

1 (b) The amendment made by subsection (a) shall
2 apply to taxable years beginning after December 31, 1993.

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