## A Positive Theory of Tax Reform

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## Motivation

#### • Tax policy of changes through discrete reforms

- No clear notion of reform in most political economy models of tax policy
- Is there something distinct about the politics of tax reform?

#### • Most tax reforms involve changes in the tax base

- Not only in tax rates
- No sharp distinction between the base and rates in existing political economy models of taxation

#### • Large focus on vertical redistribution.

- But tax reform often attempts to address **horizontal** inequities and resultant distortions
- E.g. TRA 1986 designed to be vertically neutral

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## What I Do in this Paper

- Tractable model based on Yitzhaki (1979), Wilson (1989), Slemrod-Kopczuk (2002)
  - Monopolistic competition among firms
    - Distributional implications of narrow tax base
  - Endogenous labor supply
    - Aggregate demand externality of narrow tax base

- Tax base and tax rates determined through a political process
  - Lobbying model with fixed entry costs

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- Tax reform more likely when revenue needs are high
- Tax reform can be Pareto improving at a "reform moment"
- Large reforms easier to implement than marginal ones
- Politically feasible reforms involve **broadening the base** and **lowering** marginal **rates**
- Incentives to lobby for tax reform are strategically complementary ⇒ Multiple equilibria



## Citizen preferences, constraint, choice

$$u^{j} = x^{j} - \frac{(h^{j})^{1+\frac{1}{\eta}}}{1+1/\eta}$$
 (Preferences)  
$$x^{j} = \left[\int_{i=0}^{1} (x^{j}(i))^{\frac{\varepsilon-1}{\varepsilon}} di\right]^{\frac{\varepsilon}{\varepsilon-1}}$$
 (CES aggregate)  
$$\underbrace{\int_{i=0}^{1} p(i) x^{j}(i) di}_{\text{Consumption}} \leq \underbrace{(1-\tau) (wh^{j} + \pi^{j})}_{\text{Net income}} + \underbrace{\tau \int_{i=f}^{1} p(i) x^{j}(i) di}_{\text{Tax Deduction}}$$

 $\Rightarrow$  Demand for variety  $x^{j}(i)$ , labor supply  $h^{j}$ .

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Firms

$$\max \pi(i)$$
 s.t.

$$x\left(i\right) = \int_{0}^{1} x^{j}\left(i\right) dj, \qquad \qquad \text{(Demand)}$$

 $x(i) \le zh(i)$  (Technology)

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 $p(i) = \mu \frac{w}{z} = p = 1$  (Price)  $\pi(i) = \frac{\mu - 1}{\mu} x(i)$  (Markup)

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## CPI and Tax Wedge

$$p^{c}(i) = rac{1}{1 - \tau(i)}; \qquad au(i) = \begin{cases} 0 & i ext{ exempt} \\ au & i ext{ taxed} \end{cases}$$
 (Consumer Price)

$$p^{\mathsf{c}} \equiv \left( \int_{i=0}^{1} \left( p^{\mathsf{c}} \left( i \right) \right)^{1-\varepsilon} \right)^{\frac{1}{1-\varepsilon}} = \frac{1}{1-\hat{\tau}} \tag{CPI}$$

$$1 - \hat{\tau} \equiv \left[ f \left( 1 - \tau \right)^{\varepsilon - 1} + \left( 1 - f \right) \right]^{\frac{1}{\varepsilon - 1}}$$
 (Effective tax rate)

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## Indirect Utility

$$u^{j} = (z (1 - \hat{\tau}))^{\eta + 1} \left( \frac{1}{1 + \eta} + (\mu - 1) \frac{(1 - \tau (f))^{\varepsilon}}{(1 - \hat{\tau})^{\varepsilon - 1}} \right)$$

Two components:

Utility of "worker"

$$wh^{j} - rac{\left(h^{j}
ight)^{1+rac{1}{\eta}}}{1+\eta} = rac{\left(z\left(1-\hat{\tau}
ight)
ight)^{\eta+1}}{1+\eta}$$

- Same regardless of tax status.
- Decreasing in effective tax rate  $\hat{\tau}$ .

## Indirect Utility

$$u^{j} = (z (1 - \hat{\tau}))^{\eta + 1} \left( \frac{1}{1 + \eta} + (\mu - 1) \frac{(1 - \tau (f))^{\varepsilon}}{(1 - \hat{\tau})^{\varepsilon - 1}} \right)$$

#### 2. Utility of "entrepreneur"

$$\pi^{j} = (\mu - 1) \underbrace{(z (1 - \hat{\tau}))^{\eta + 1}}_{\text{Aggregate Demand}} \underbrace{\frac{(1 - \tau (j))^{\varepsilon}}{(1 - \hat{\tau})^{\varepsilon - 1}}}_{\text{Belative Demand}}$$

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## Revenues

$$\rho = \underbrace{\tau\left(wh + \pi\right)}_{\text{Pre-deductions}} - \underbrace{\tau \int_{i=f}^{1} p\left(i\right) x\left(i\right) di}_{\text{Deductions}}$$
(Revenues)  
$$\log \rho = \underbrace{\log \tau + \eta \log\left(1 - \hat{\tau}\right)}_{\text{Standard}} + \underbrace{\log f}_{\text{Base}} + \underbrace{(\varepsilon - 1) \log\left(\frac{1 - \tau}{1 - \hat{\tau}}\right)}_{\text{Tax efficiency}}$$

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# Feasible Policies For $g \in [10\%, 50\%]$ of GDP



Preferred policy of *j*:

$$\begin{split} \max_{\tau,f} u^{j} & \Longleftrightarrow \max_{\tau,f} \left( z \left( 1 - \hat{\tau} \right) \right)^{\eta + 1} \left( \frac{1}{1 + \eta} + \left( \mu - 1 \right) \frac{\left( 1 - \tau \left( f, j \right) \right)^{\varepsilon}}{\left( 1 - \hat{\tau} \right)^{\varepsilon - 1}} \right) \\ \text{s.t.} \\ \rho \left( \tau, f \right) \geq g. \end{split}$$

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## Utility with and without a Tax Break



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## Utility with and without a Tax Break



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## **Preferred Policy**

#### **Proposition 2:**

- Optimal base for all citizens f = 1, keeping their *own* tax status fixed.
  - Always prefer broadening the base
  - as long as it doesn't affect own tax status
- $\Rightarrow$  Socially optimal tax base always f = 1.
  - We'll refer to a move from f < 1 to f = 1 as tax reform

Parameter Assumption

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## Utility with and without a Tax Break



There is a tax base below which tax reform is Pareto improving

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#### **Proposition 3:**

For any value of g there exists a tax base f = f<sup>R</sup> such that all citizens prefer f = 1 to all feasible tax bases f < f<sup>R</sup>

#### • $\Rightarrow f = 1$ is Pareto improving relative to all $f < f^R$

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## Marginal Reform



If losers must be compensated, marginal reform always costly

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## **Big-Bang Reform**



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### Private Value of Tax Break



Prop. 4: Private value of tax break decreasing in tax base

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## Increases in Public Good Needs...



## Increase the Scope for Pareto-Improving Reform



## Politics: Fixed Cost to Lobbying

#### 3 Stage political game:

- Each citizen *i* decides whether to lobby.
   Lobbying incurs a fixed cost φ.
- The value of g is drawn from a distribution Γ(g).
   Lobbyists choose policy {τ, f} to maximize joint utility.
- Solution Sconomy operates under policy  $\{\tau, f\}$ ; payoffs are realized.

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## Subgame equilibrium of Stage 2



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## Benefit of Lobbying in Stage 2



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## Expected Cost and Benefit of Lobbying

Equilibrium lobby size



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- Tax reform triggered by large revenue needs.
- Tax reform involves broadening the base and (typically) lowering rates.
- Large reforms feasible. Marginal reforms politically difficult.
- Private gains from tax breaks higher when tax base is narrow
   ⇒ Multiple equilibria.

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## Data

- Data on corporate tax base changes from Kawano and Slemrod (2012)
  - 30 OECD Countries
  - 1980-2004
- Define *Broaden*= 1 as any broadening of the tax base for domestic corporations
  - Robust to international tax reforms
- Right hand side variables
  - Tax revenues / GDP (or G/GDP or Debt/GDP)
  - Current statutory corporate tax rate
  - Change in statutory rate

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Results

#### Table: Regression Results

Dependent Variable = Reform					
1	2	3	4	5	6
.009** (.004)	.010** (.004)	.009** (.004)	.032** (.014)	.008** (.003)	.007* (.004)
	.009*** (.002)	.007*** (.002)	.026*** (.009)	.008*** (.003)	.007* (.004)
	017*** (.006)	018*** (.006)	060*** (.022)	020*** (.007)	014** (.006)
NO	NO	YES	YES	YES	YES
NO	NO	NO	NO	YES	YES
0.01	0.05	0.15	0.11	0.20	0.19
709	621	621	566	621	653
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	1 .009** (.004) NO NO NO 0.01 709	Dep           1         2           .009**         .010**           (.004)         .009***           (.002)        017***           .006)         NO           NO         NO           NO         NO           0.01         0.05           709         621	Dependent Val           1         2         3           .009**         .010**         .009**           (.004)         (.004)         (.004)           .009***         .007***           (.002)         (.002)          017***        018***           (.006)         VES           NO         NO           NO         NO           0.01         0.05           709         621	$\begin{array}{c c c c c c c c c c c c c c c c c c c $	Dependent Variable = Reform           1         2         3         4         5           .009**         .010**         .009**         .032**         .008**           (.004)         (.004)         (.014)         (.003)           .009***         .007***         .026***         .008***           (.002)         (.002)         (.009)         (.003)          017***        018***         .060***        020***           (.006)         .016         .022         '.007           NO         NO         YES         YES           NO         NO         NO         YES           0.01         0.05         0.15         0.11         0.20           709         621         621         566         621

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- Tractable model for political determination of tax base+rates.
- Provides predictions for when and how these policies might be reformed.
- Consistent with tax reform experiences in OECD countries over past few decades.

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## Tax Aversion

• If (but not only if)

$$(1-\hat{\tau})^{\varepsilon-1} > (\mu-1) (\varepsilon - \eta - 2) \dots$$

...all citizens prefer lower statutory and effective tax rates.

- Assumption 1: Citizens are tax averse
- E.g. (parameterization used in figures)
  - $\eta = 0.5$ •  $\varepsilon = 2$  (Broda and Weinstein, 2006).

$$1 - \hat{\tau} > -0.5 \, (\mu - 1)$$

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