

**AMENDMENT TO  
RULES COMMITTEE PRINT 115-39  
OFFERED BY MS. KUSTER OF NEW HAMPSHIRE**

At the end, add the following:

1 **TITLE VI—WORKFORCE DEVEL-**  
2 **OPMENT INVESTMENT ACT**  
3 **OF 2017**

4 **SEC. 6001. SHORT TITLE.**

5 This title may be cited as the “Workforce Develop-  
6 ment Investment Act of 2017”.

7 **SEC. 6002. CREDIT FOR EMPLOYERS WHICH PARTNER WITH**  
8 **EDUCATIONAL INSTITUTIONS TO IMPROVE**  
9 **WORKFORCE DEVELOPMENT AND JOB TRAIN-**  
10 **ING FOR STUDENTS.**

11 (a) **IN GENERAL.**—Subpart D of part IV of sub-  
12 chapter A of chapter 1 of the Internal Revenue Code of  
13 1986 is amended by adding at the end the following new  
14 section:

1 **“SEC. 45S. EMPLOYERS PARTNERING WITH EDUCATIONAL**  
2 **INSTITUTIONS TO IMPROVE WORKFORCE DE-**  
3 **VELOPMENT AND JOB TRAINING FOR STU-**  
4 **DENTS.**

5 “(a) GENERAL RULE.—For purposes of section 38,  
6 the employer partnering credit determined under this sec-  
7 tion for any taxable year is an amount equal to \$5,000  
8 for each qualified educational institution engaged in a  
9 qualified partnership with the employer.

10 “(b) MAXIMUM CREDIT.—

11 “(1) IN GENERAL.—The maximum credit deter-  
12 mined under this section for the taxable year shall  
13 not exceed \$20,000.

14 “(2) CONTROLLED GROUPS.—For purposes of  
15 paragraph (1), all persons treated as a single em-  
16 ployer under subsection (b), (c), (m), or (o) of sec-  
17 tion 414 shall be treated as a single taxpayer.

18 “(c) DEFINITIONS.—For purposes of this section—

19 “(1) QUALIFIED EDUCATIONAL INSTITUTION.—  
20 The term ‘qualified educational institution’ means  
21 any community college, any other institution of high-  
22 er education, and any area career and technical edu-  
23 cation school.

24 “(2) COMMUNITY COLLEGE.—The term ‘com-  
25 munity college’ means an institution of higher edu-  
26 cation that—

1           “(A) admits as a regular student an indi-  
2           vidual who is beyond the age of compulsory  
3           school attendance in the State in which the in-  
4           stitution is located and who has the ability to  
5           benefit from the training offered by the institu-  
6           tion, and

7           “(B) offers a 2-year program in engineer-  
8           ing, mathematics, or the physical or biological  
9           sciences designed to prepare a student to work  
10          as a technician or at the semiprofessional level  
11          in engineering, scientific, or other technological  
12          fields requiring the understanding and applica-  
13          tion of basic engineering, scientific, or mathe-  
14          matical principles of knowledge.

15          “(3) INSTITUTION OF HIGHER EDUCATION.—  
16          The term ‘institution of higher education’ has the  
17          meaning given such term in section 102 of the High-  
18          er Education Act of 1965 (20 U.S.C. 1002).

19          “(4) AREA CAREER AND TECHNICAL EDU-  
20          CATION SCHOOL.—The term ‘area career and tech-  
21          nical education school’ has the meaning given such  
22          term in section 3 of the Carl D. Perkins Career and  
23          Technical Education Act of 2006 (29 U.S.C. 2302).

24          “(5) QUALIFIED PARTNERSHIP.—Not later  
25          than six months after the date of the enactment of

1 this section, the Secretary of Education, in consulta-  
2 tion with the Secretary of Labor, shall define the  
3 term ‘qualified partnership’. Such term shall include  
4 a partnership through which—

5 “(A) an employer collaborates with an edu-  
6 cational institution to help develop curriculum  
7 in order to improve workforce development and  
8 job training for students,

9 “(B) an employer helps provide instruction  
10 to students in the classroom, and

11 “(C) an employer provides internships, ap-  
12 prenticeships, or other similar educational op-  
13 portunities in the workplace for students.

14 “(d) CERTAIN RULES TO APPLY.—For purposes of  
15 this section, rules similar to the rules of subsections (c),  
16 (d), and (e) of section 52 shall apply.”.

17 (b) CREDIT TO BE PART OF GENERAL BUSINESS  
18 CREDIT.—Section 38(b) of such Code is amended by strik-  
19 ing “plus” at the end of paragraph (35), by striking the  
20 period at the end of paragraph (36) and inserting “, plus”,  
21 and by adding at the end the following new paragraph:

22 “(37) the employer partnering credit deter-  
23 mined under section 45S.”.

24 (c) CLERICAL AMENDMENT.—The table of sections  
25 for subpart D of part IV of subchapter A of chapter 1

1 of such Code is amended by adding at the end the fol-  
2 lowing new item:

“Sec. 45S. Employers partnering with educational institutions to improve work-  
force development and job training for students.”.

3 (d) **EFFECTIVE DATE.**—The amendments made by  
4 this section shall apply to taxable years beginning after  
5 the date of the enactment of this Act.

6 **SEC. 6003. TAX CREDIT FOR EMPLOYERS WHO ENGAGE IN**  
7 **QUALIFIED WORKER TRAINING.**

8 (a) **IN GENERAL.**—Subpart D of part IV of sub-  
9 chapter A of chapter 1 of the Internal Revenue Code of  
10 1986, as amended by the preceding provisions of this Act,  
11 is amended by adding at the end the following new section:

12 **“SEC. 45T. CREDIT FOR EMPLOYERS WHO ENGAGE IN**  
13 **QUALIFIED WORKER TRAINING.**

14 “(a) **IN GENERAL.**—For purposes of section 38, in  
15 the case of any employer, the worker training tax credit  
16 determined under this section with respect to any eligible  
17 employee of the employer is an amount equal to the lesser  
18 of—

19 “(1) 50 percent of the job training program ex-  
20 penditures of the taxpayer with respect to such em-  
21 ployee during the taxable year, or

22 “(2) \$5,000.

23 “(b) **JOB TRAINING PROGRAM EXPENSES.**—For pur-  
24 poses of this section—

1           “(1) IN GENERAL.—The term ‘job training pro-  
2           gram expenses’ means amounts paid or incurred by  
3           the employer for expenses incurred by or on behalf  
4           of an eligible employee for participation in a quali-  
5           fied training program.

6           “(2) QUALIFIED TRAINING PROGRAM.—The  
7           term ‘qualified training program’ means—

8                   “(A) a qualified partnership (as defined in  
9                   section 45S(c)(5)), or

10                   “(B) an apprenticeship program registered  
11                   and certified with the Secretary of Labor under  
12                   section 1 of the National Apprenticeship Act  
13                   (29 U.S.C. 50).

14           “(c) ELIGIBLE EMPLOYEE.—For purposes of this  
15           section, the term ‘eligible employee’ means any employee  
16           of the employer who, while participating in the qualified  
17           training program, is—

18                   “(1) employed on average at least 40 hours of  
19                   service per week, or

20                   “(2) in the case of a qualified training program  
21                   which a qualified partnership (as defined in section  
22                   45S(c)(5)), meets such hourly work requirements as  
23                   may be specified by the Secretary of Education in  
24                   connection with such partnership.

1           “(d) RECAPTURE OF CREDIT FOR EMPLOYEE NOT  
2 PERFORMING MINIMUM SERVICE.—

3           “(1) IN GENERAL.—In the case of any em-  
4 ployee with respect to whom a credit is allowed  
5 under this section and whose employment is termi-  
6 nated by the employer (other than by reason of such  
7 employee’s gross misconduct) before the end of the  
8 2-year period beginning on the first day of the em-  
9 ployee’s study or training with respect to which a  
10 credit is allowed under this section, the tax of the  
11 taxpayer under this chapter for the taxable year dur-  
12 ing which such termination occurs shall be increased  
13 by an amount equal to—

14           “(A) the aggregate decrease in the credits  
15 allowed under section 38 for all prior taxable  
16 years which would have resulted if the job  
17 training program expenses with respect to such  
18 employee had been zero, multiplied by

19           “(B) the inclusion ratio.

20           “(2) INCLUSION RATIO.—For purposes of this  
21 subsection, the inclusion ratio is the ratio which—

22           “(A) an amount equal to the difference  
23 of—

24           “(i) the number of days in the 2-year  
25 period, over

1                   “(ii) the number of days such em-  
2                   ployee was employed by the employer dur-  
3                   ing such 2-year period, bears to

4                   “(B) the number of days in the 2-year pe-  
5                   riod.

6                   “(e) CONTROLLED GROUPS.—For purposes of this  
7                   section, all persons treated as a single employer under sub-  
8                   section (b), (c), (m), or (o) of section 414 shall be treated  
9                   as a single employer.”.

10                  (b) CREDIT TO BE PART OF GENERAL BUSINESS  
11                  CREDIT.—Subsection (b) of section 38 of such Code, as  
12                  amended by the preceding provisions of this Act, is amend-  
13                  ed by striking “plus” at the end of paragraph (36), by  
14                  striking the period at the end of paragraph (37) and in-  
15                  serting “, plus”, and by adding at the end the following  
16                  new paragraph:

17                         “(38) the worker training tax credit determined  
18                         under section 45T(a).”.

19                  (c) CLERICAL AMENDMENT.—The table of sections  
20                  for subpart D of part IV of subchapter A of chapter 1  
21                  of such Code is amended by adding at the end the fol-  
22                  lowing new item:

                          “Sec. 45T. Credit for employers who engage in qualified worker training.”.

23                  (d) EFFECTIVE DATE.—The amendments made by  
24                  this section shall apply to taxable years beginning after  
25                  the date of the enactment of this Act.

1 **SEC. 6004. CORPORATE RATE INCREASE TO ACHIEVE REV-**  
2 **ENUE NEUTRALITY.**

3 (a) **IN GENERAL.**—The rate of tax specified in sec-  
4 tion 11(b)(1) of the Internal Revenue Code of 1986 (after  
5 the amendment made by section 3001(a)) shall be in-  
6 creased by such number of percentage points as is nec-  
7 essary to fully offset the aggregate reduction in Federal  
8 revenues which result from the amendments made by this  
9 title.

10 (b) **EFFECTIVE DATE.**—Subsection (a) shall apply as  
11 if such provision were an amendment made by section  
12 3001(a).

