

**AMENDMENT TO H.R. 1994, AS REPORTED**  
**OFFERED BY MR. NEAL OF MASSACHUSETTS**

In section 107, insert after subsection (a) the following:

1           (b) COORDINATION WITH QUALIFIED CHARITABLE  
2 DISTRIBUTIONS.—Add at the end of section 408(d)(8)(A)  
3 of such Code the following: “The amount of distributions  
4 not includible in gross income by reason of the preceding  
5 sentence for a taxable year (determined without regard to  
6 this sentence) shall be reduced (but not below zero) by  
7 an amount equal to the excess of—

8                           “(i) the aggregate amount of deduc-  
9                           tions allowed to the taxpayer under section  
10                           219 for all taxable years ending on or after  
11                           the date the taxpayer attains age 70½,  
12                           over

13                           “(ii) the aggregate amount of reduc-  
14                           tions under this sentence for all taxable  
15                           years preceding the current taxable year.”.

In section 401(k)(15)(B)(iii) of the Internal Revenue Code of 1986, as proposed to be added by section 112, add at the end the following: “, and section 411(a)(6)

shall be applied by substituting ‘at least 500 hours of service’ for ‘more than 500 hours of service’ in subparagraph (A) thereof’.

In section 401(k)(15)(B)(iv) of the Internal Revenue Code of 1986, as proposed to be added by section 112, insert “(other than clause (iii))” after “This subparagraph”.

In section 114(c), strike paragraph (2).

In section 303(m)(6) of the Employee Retirement Income Security Act of 1974, as proposed to be added by section 115, strike “a community newspaper plan which elects the application of” and insert “a plan for which an election is made to apply”.

In section 202(b), insert before the period at the end the following: “and shall require such information as will enable a participant in a plan to identify any aggregated return or report filed with respect to the plan”.

In section 302, strike subsections (b) and (d).

Amend section 401(a)(9)(H)(iv) of the Internal Revenue Code of 1986, as proposed to be added by section 401, to read as follows:

1 “(iv) APPLICATION TO CERTAIN ELI-  
2 GIBLE RETIREMENT PLANS.—For purposes

1 of applying the provisions of this subpara-  
2 graph in determining amounts required to  
3 be distributed pursuant to this paragraph,  
4 all eligible retirement plans (as defined in  
5 section 402(c)(8)(B), other than a defined  
6 benefit plan described in clause (iv) or (v)  
7 thereof or a qualified trust which is a part  
8 of a defined benefit plan) shall be treated  
9 as a defined contribution plan.”.

In section 403(a)(1), strike “\$105” and insert  
“\$250”.

In section 403(a)(2), strike “\$50,000” and insert  
“\$150,000”.

In section 403(b)(1), strike “\$2” and insert “\$10”.

In section 403(b)(2), strike “\$10,000” and insert  
“\$50,000”.

In section 403(b)(3), strike “\$5,000” and insert  
“\$10,000”.

Add at the end the following:

1           **TITLE V—TAX RELIEF FOR**  
2                           **CERTAIN CHILDREN**

3   **SEC. 501. CERTAIN MILITARY SURVIVOR BENEFITS, CER-**  
4                           **TAIN PAYMENTS MADE BY INDIAN TRIBAL**  
5                           **GOVERNMENTS, CERTAIN SCHOLARSHIPS OR**  
6                           **FELLOWSHIP GRANTS, AND ALASKA PERMA-**  
7                           **NENT FUND DIVIDENDS TREATED AS EARNED**  
8                           **INCOME FOR KIDDIE TAX.**

9           (a) IN GENERAL.—Section 1(g)(4)(C) of the Internal  
10 Revenue Code of 1986 is amended to read as follows:

11                           “(C) TREATMENT OF CERTAIN AMOUNTS  
12 AS EARNED INCOME.—For purposes of this sub-  
13 section, each of following amounts shall be  
14 treated as earned income of the child referred  
15 to in paragraph (1) to the extent included in  
16 the gross income of such child:

17                           “(i) DISTRIBUTIONS FROM QUALIFIED  
18 DISABILITY TRUSTS.—Any amount in-  
19 cluded in the gross income of such child  
20 under section 652 or 662 by reason of  
21 being a beneficiary of a qualified disability  
22 trust (as defined in section  
23 642(b)(2)(C)(ii)).

24                           “(ii) CERTAIN MILITARY SURVIVOR  
25 BENEFITS.—Any benefit under laws ad-

1 ministered by the Secretary of Defense or  
2 the Secretary of Veterans Affairs which is  
3 received by such child by reason of the  
4 child being the survivor of a deceased  
5 member of the Armed Forces or of a de-  
6 ceased veteran.

7 “(iii) CERTAIN INDIAN TRIBAL PAY-  
8 MENTS.—Any payment made by an Indian  
9 tribal government (as defined in section  
10 139E(c)(1)), or from a trust of which the  
11 Indian tribal government is treated as the  
12 owner under subpart E of part I of sub-  
13 chapter J, to such child if—

14 “(I) such child is an enrolled  
15 member of the tribe with respect to  
16 such Indian tribal government, and

17 “(II) such payment is received by  
18 such child by reason of such enroll-  
19 ment.

20 “(iv) CERTAIN SCHOLARSHIPS OR  
21 FELLOWSHIP GRANTS.—Any scholarship or  
22 fellowship grant which is received by such  
23 child if—

24 “(I) such child is a candidate for  
25 a degree at an educational organiza-

1                   tion       described       in       section  
2                   170(b)(1)(A)(ii), and

3                               “(II) such scholarship or grant  
4                   supports such candidacy.

5                               “(v) ALASKA PERMANENT FUND DIVI-  
6                   DENDS.—Any Alaska Permanent Fund  
7                   dividend.”.

8       (b) APPLICATION TO ALTERNATIVE MINIMUM  
9 TAX.—Section 59(j)(1)(A) of such Code is amended by  
10 inserting “and including amounts treated as earned in-  
11 come under section 1(g)(4)(C)” after “section 911(d)(2)”.

12       (c) EFFECTIVE DATE.—The amendment made by  
13 this section shall apply to taxable years beginning after  
14 December 31, 2017.

