

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 107, strike subsection (c) and insert the following:

16 (c) EFFECTIVE DATE.—

1 (1) IN GENERAL.—Except as provided in para-
2 graph (2), the amendments made by this section
3 shall apply to contributions made for taxable years
4 beginning after December 31, 2019.

5 (2) SUBSECTION (b).—The amendment made
6 by subsection (b) shall apply to distributions made
7 for taxable years beginning after December 31,
8 2019.

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(e), 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
3 of applying the provisions of this subpara-
4 graph in determining amounts required to
5 be distributed pursuant to this paragraph,
6 all eligible retirement plans (as defined in
7 section 402(c)(8)(B), other than a defined
8 benefit plan described in clause (iv) or (v)
9 thereof or a qualified trust which is a part
10 of a defined benefit plan) shall be treated
11 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. MODIFICATION OF RULES RELATING TO THE TAX-**
4 **ATION OF UNEARNED INCOME OF CERTAIN**
5 **CHILDREN.**

6 (a) IN GENERAL.—Section 1(j) of the Internal Rev-
7 enue Code of 1986 is amended by striking paragraph (4).

8 (b) COORDINATION WITH ALTERNATIVE MINIMUM
9 TAX.—Section 55(d)(4)(A) of the Internal Revenue Code
10 of 1986 is amended by striking “and” at the end of clause
11 (i)(II), by striking the period at the end of clause (ii)(III)
12 and inserting “, and”, and by adding at the end the fol-
13 lowing new clause:

14 “(iii) subsection (j) of section 59 shall
15 not apply.”.

16 (c) EFFECTIVE DATE.—

17 (1) IN GENERAL.—Except as otherwise pro-
18 vided in this subsection, the amendment made by

1 subsection (a) shall apply to taxable years beginning
2 after December 31, 2018.

3 (2) COORDINATION WITH ALTERNATIVE MIN-
4 IMUM TAX.—The amendment made by subsection
5 (b) shall apply to taxable years beginning after De-
6 cember 31, 2017.

7 (3) ELECTIVE RETROACTIVE APPLICATION.—In
8 the case of a taxpayer who elects the application of
9 this paragraph (at such time and in such manner as
10 the Secretary of the Treasury (or the Secretary's
11 designee) may provide), the amendment made by
12 subsection (a) shall apply to taxable years beginning
13 after December 31, 2017.

