

S 714

No Tax Breaks for Outsourcing Act

Congress: 117 (2021–2023, Ended)

Chamber: Senate

Policy Area: Taxation

Introduced: Mar 11, 2021

Current Status: Read twice and referred to the Committee on Finance.

Latest Action: Read twice and referred to the Committee on Finance. (Mar 11, 2021)

Official Text: <https://www.congress.gov/bill/117th-congress/senate-bill/714>

Sponsor

Name: Sen. Whitehouse, Sheldon [D-RI]

Party: Democratic • **State:** RI • **Chamber:** Senate

Cosponsors (8 total)

Cosponsor	Party / State	Role	Date Joined
Sen. Durbin, Richard J. [D-IL]	D · IL		Mar 11, 2021
Sen. Gillibrand, Kirsten E. [D-NY]	D · NY		Mar 11, 2021
Sen. Merkley, Jeff [D-OR]	D · OR		Mar 11, 2021
Sen. Reed, Jack [D-RI]	D · RI		Mar 11, 2021
Sen. Van Hollen, Chris [D-MD]	D · MD		Mar 11, 2021
Sen. Warren, Elizabeth [D-MA]	D · MA		Mar 11, 2021
Sen. Murphy, Christopher [D-CT]	D · CT		Apr 29, 2021
Sen. Baldwin, Tammy [D-WI]	D · WI		Jul 27, 2021

Committee Activity

Committee	Chamber	Activity	Date
Finance Committee	Senate	Referred To	Mar 11, 2021

Subjects & Policy Tags

Policy Area:

Taxation

Related Bills

Bill	Relationship	Last Action
117 HR 2976	Related bill	May 4, 2021: Referred to the House Committee on Ways and Means.
117 S 1501	Related bill	Apr 29, 2021: Read twice and referred to the Committee on Finance. (text: CR S2364-2365)
117 HR 1785	Identical bill	Mar 11, 2021: Referred to the House Committee on Ways and Means.

No Tax Breaks for Outsourcing Act

This bill modifies the tax treatment of the foreign source income of domestic corporations. The bill includes provisions that

- modify calculations of the gross income of U.S. shareholders to include net CFC tested income in the current taxable year,
- apply limitations on the foreign tax credit on a country-by-country basis,
- limit the tax deduction for the interest expense of a U.S. corporation that is a member of a financial reporting group (i.e., a group that prepares consolidated financial statements according to generally accepted accounting principles or international financial reporting standards),
- modify the rules for the taxation of inverted corporations (i.e., U.S. corporations that acquire foreign companies to reincorporate in a foreign jurisdiction with income tax rates lower than the United States), and
- treat certain foreign corporations managed and controlled primarily in the United States as domestic corporations for tax purposes.

Actions Timeline

- **Mar 11, 2021:** Introduced in Senate
- **Mar 11, 2021:** Read twice and referred to the Committee on Finance.