

S 357

No Tax Breaks for Outsourcing Act

Congress: 118 (2023–2025, Ended)

Chamber: Senate

Policy Area: Taxation

Introduced: Feb 9, 2023

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

Latest Action: Read twice and referred to the Committee on Finance. (Feb 9, 2023)

Official Text: <https://www.congress.gov/bill/118th-congress/senate-bill/357>

Sponsor

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

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

Cosponsors (16 total)

Cosponsor	Party / State	Role	Date Joined
Sen. Baldwin, Tammy [D-WI]	D · WI		Feb 9, 2023
Sen. Blumenthal, Richard [D-CT]	D · CT		Feb 9, 2023
Sen. Booker, Cory A. [D-NJ]	D · NJ		Feb 9, 2023
Sen. Casey, Robert P., Jr. [D-PA]	D · PA		Feb 9, 2023
Sen. Duckworth, Tammy [D-IL]	D · IL		Feb 9, 2023
Sen. Durbin, Richard J. [D-IL]	D · IL		Feb 9, 2023
Sen. Heinrich, Martin [D-NM]	D · NM		Feb 9, 2023
Sen. Hirono, Mazie K. [D-HI]	D · HI		Feb 9, 2023
Sen. Markey, Edward J. [D-MA]	D · MA		Feb 9, 2023
Sen. Merkley, Jeff [D-OR]	D · OR		Feb 9, 2023
Sen. Murphy, Christopher [D-CT]	D · CT		Feb 9, 2023
Sen. Reed, Jack [D-RI]	D · RI		Feb 9, 2023
Sen. Schatz, Brian [D-HI]	D · HI		Feb 9, 2023
Sen. Van Hollen, Chris [D-MD]	D · MD		Feb 9, 2023
Sen. Warren, Elizabeth [D-MA]	D · MA		Feb 9, 2023
Sen. Fetterman, John [D-PA]	D · PA		May 14, 2024

Committee Activity

Committee	Chamber	Activity	Date
Finance Committee	Senate	Referred To	Feb 9, 2023

Subjects & Policy Tags

Policy Area:

Taxation

Related Bills

Bill	Relationship	Last Action
118 HR 8268	Related bill	May 7, 2024: Referred to the House Committee on Ways and Means.
118 S 4275	Related bill	May 7, 2024: Read twice and referred to the Committee on Finance. (text: CR S3505)
118 HR 884	Identical bill	Feb 9, 2023: Referred to the House Committee on Ways and Means.

Summary (as of Feb 9, 2023)

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 controlled foreign corporation (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 an international 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

- **Feb 9, 2023:** Introduced in Senate
- **Feb 9, 2023:** Read twice and referred to the Committee on Finance.