

# Malas Notches

Ben Lockwood<sup>1</sup>

University of Warwick and CEPR

ASSA, 6 January 2018

## Introduction

- Important new development in public economics - the sufficient statistic approach, which "derives formulas for the welfare consequences of policies that are functions of high-level elasticities rather than deep primitives" (Chetty (2009), p 451).
- Feldstein (1999): for a proportional income tax  $t$ , marginal excess burden (MEB) only depends on behavioral responses via the elasticity of taxable income (ETI),  $e$ .
  - $e$  measures the *intensive margin* response to a change in  $t$  i.e. the change in the taxable income of a given individual to  $t$
- Now a large literature on empirical estimates of  $e$  (e.g. Gruber and Saez (2002), Saez, Slemrod, and Giertz (2012), Kleven and Schultz (2014), Weber (2014)).

# Introduction

- Saez (2001) showed that the Feldstein formula could be extended to a proportional income tax with an allowance (single-bracket tax), with one more sufficient statistic  $a$  of the income distribution, constant if the top tail of the income distribution is Pareto
- Also, he showed that revenue-maximising tax rate depends only on  $e, a$  and the welfare maximising tax rate depends on  $e, a$  and a welfare weight  $\bar{g}$

## This Paper

- The “sufficient statistics” approach fails with notches
- Specifically,  $MEB = \frac{te+C}{1-t-te-C}$  where  $C > 0$  is a correction factor
  - This is the formula for the MEB of a *proportional* tax (Feldstein (1999)) plus a correction factor  $C$
- But, correction factor is complex (does not depend on simple sufficient statistics) and is quantitatively important for a calibrated version of the model
  - At baseline values, ignoring  $C$  underestimates the MEB by about 86%, and the revenue-maximising tax is overestimated by around 100%
- Application to VAT: MEB is underestimated by about 50%

# Tax Notches

- Some notches in income taxes:
  - PIT; Pakistan has notches of up to 5% (Kleven and Waseem (2013)), Ireland, an emergency income levy with a notch of up to 4% (Hargaden (2015)), small notches in the federal PIT in the US (Slemrod (2013)).
  - notches in the CIT in Costa Rica (Bachas and Mauricio (2015)).
- Notches in housing transactions taxes in the UK and the US (Best and Kleven (2014), Kopczuk and Munroe (2014)).
- Slemrod (2013): many examples of commodity tax notches
  - a marginal change in some characteristic can change the product classification so as to produce a discrete change in the tax liability e.g. the US Gas Guzzler Tax
- Most important case: a VAT threshold can be a tax notch (Liu & Lockwood (2015))

## Related Literature

- Already known that due the sufficient statistic approach is limited due to externalities
- Saez, Slemrod and Giertz (2012); positive externalities if “socially valuable” activities can be deducted from income tax e.g. charitable giving/mortgage interest payments
- Chetty (2010): possible positive fiscal externalities with income tax evasion if (part of) the cost of evasion is a transfer payment (e.g. a fine to the government)
- By contrast, our results nothing to do with externalities- rather, difference between intensive margin and total ETI.

## The Set-Up

- Individual taxpayers indexed by a skill or taste parameter  $n \in [\underline{n}, \bar{n}]$ , distributed with density  $h(n)$ .
- A type  $n$  individual has preferences over consumption  $c$  and taxable income  $z$  of  $u(c, z; n) = c - d(z; n)$
- Assume  $d_z, d_{zz} > 0, d_n, d_{nz} < 0$
- Iso-elastic case:  $d(z; n) = \frac{n}{1+1/e} (z/n)^{1+1/e}$
- The budget constraint is  $c = z - T(z)$ , where  $T(\cdot)$  is the tax function.
- Household  $n$ 's utility over  $z$  is  $u(z; n) = z - T(z) - d(z; n)$ .
- For any marginal rate  $t$ ,  $z(1 - t, n)$  is household  $n$ 's optimal taxable income
  - In iso-elastic case,  $z(1 - t, n) = (1 - t)^e n$

## Kinks and Notches

- For simplicity, we focus on a two-bracket tax; results extend straightforwardly to the highest tax in a piecewise-linear tax system with any number of brackets.
- So, kinked and notched two-bracket taxes are:

$$T_K(z) = \begin{cases} t_L z, & z \leq z_0 \\ t_L z_0 + t_H(z - z_0), & z > z_0 \end{cases}$$

$$T_N(z) = \begin{cases} t_L z, & z \leq z_0 \\ t_H z, & z > z_0 \end{cases}$$



# Bunching

- With either a kink or a notch, all types in an interval  $n \in [n_L, n_H]$  will bunch at taxable income  $z_0$ .
- With both a kink and a notch:  $z(1 - t_L; n_L) = z_0$
- With a kink,  $n_H$  is defined by  $z(1 - t_H; n_H) = z_0$
- With a notch,  $n_H$  is defined by

$$(1 - t_L)z_0 - d(z_0; n_H) = v(t_H; n_H)$$

where  $v(t; n) \equiv \max_z (1 - t)z - d(z; n)$

# The Bunching Effect on Revenue

- Tax revenue  $R$  depends on  $t_H$  both directly, and indirectly, via its effect on bunching i.e.  $R(t_H, n_H(t_H))$
- So:

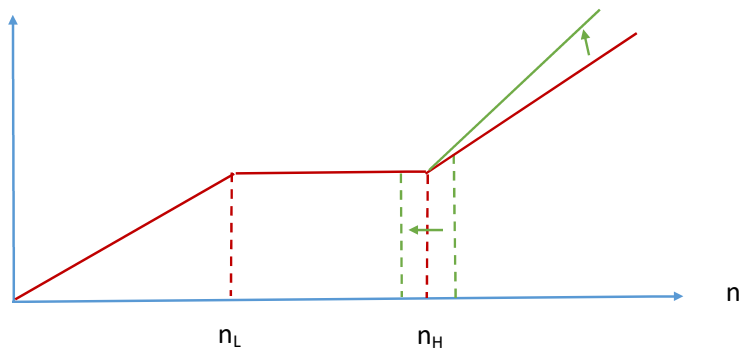
$$\frac{dR}{dt_H} = \underbrace{\frac{\partial R}{\partial t_H}}_{\text{intensive}} + \underbrace{\frac{\partial R}{\partial n_H} \frac{\partial n_H}{\partial t_H}}_{\text{bunching}}$$

- In the kink case, the bunching effect is zero, because  $\frac{\partial R}{\partial n_H} = 0$
- In the notch case,  $\frac{\partial R}{\partial n_H} = (t_L z_0 - t_H z(1 - t_H; n_H))h(n_H) < 0$

# The Bunching Effect on Tax Revenue with A Kink

Assume iso-elastic disutility so  $z(1-t; n) = (1-t)^e n$

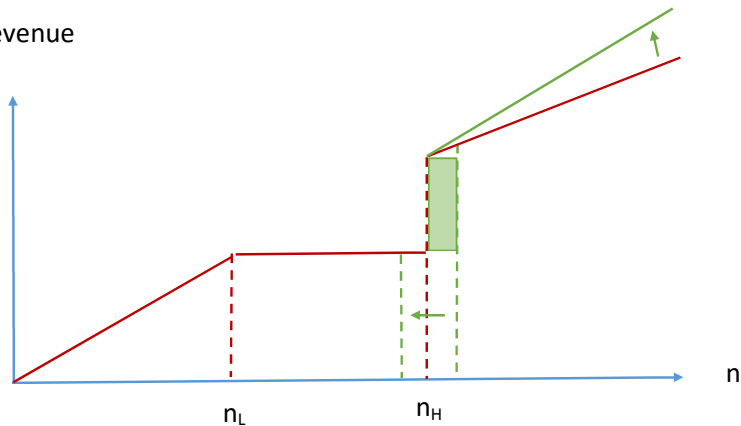
Tax revenue



# The Bunching Effect on Tax Revenue with a Notch

Assume iso-elastic disutility so  $z(1-t; n) = (1-t)^e n$

Tax revenue



## Marginal Excess Burden with a Notch

- Generally,  $MEB = -\frac{dW/dt_H}{dR/dt_H}$ , where welfare  $W$  is calculated assuming that tax revenue is redistributed as a lump-sum back to households.
- With iso-elastic utility and a Pareto upper tail of the income distribution:

$$MEB = \frac{t_H e + C}{1 - t_H(1 + e) - C},$$

$$C = \frac{(1 - t_H)(t_H(1 - t_H)^e - t_L z_0 / n_H)(1 - a)(1 + e)}{(1 - t_H)^{1+e} - (z_0 / n_H)^{1+1/e}} > 0$$

- $C$  cannot be written in terms of sufficient statistics  $e, a$  (depends also on tax parameters  $t_H, t_L, z_0$ , and on  $n_H$ , which is endogenous)

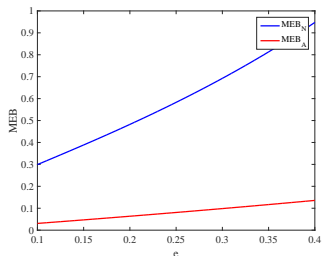
# The Welfare-Maximizing Top Rate of Tax with a Notch

- Government's objective is  $W = \int_{\underline{n}}^{\bar{n}} G(v(n))h(n)dn$
- $G$  is strictly concave, so government has a redistribution objective,  $G' = g$  are the welfare weights
- Also, government budget constraint is that  $R$  must exceed some exogenous amount
- Then, the welfare-maximising level of  $t_H$  is  $t^* = \frac{1-\bar{g}-C}{1+e}$ , where  $\bar{g}$  is the average welfare weight on all top-rate taxpayers
- Special case of revenue-maximising  $t_H$  is  $\bar{g} = 0$  i.e.  $t^* = \frac{1-C}{1+e}$

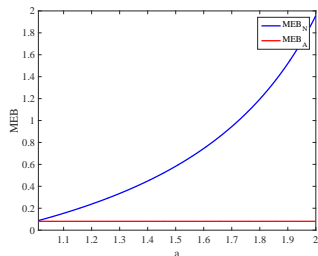
# Calibration

parameter	baseline value	range	sources
$e$	0.25	0.1- 0.4	S&S (2012), Kleven and Schultz (2014)
$a$	1.5	1.01-2.0	Piketty and Saez (2003)
$t_H - t_L$	0.03	0.0- 0.05	Kleven and Waseem (2013)
$t_L$	0.2		
$z_0$	2.168		20% of population have $z \geq z_0$

# The Marginal Excess Burden



(a)

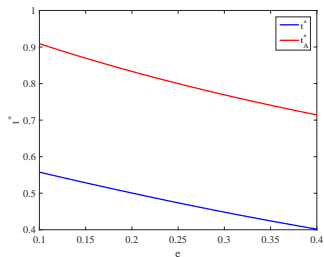


(b)

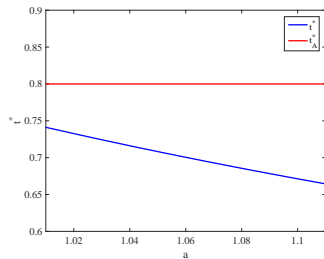
Figure: MEB as  $e, a$  vary



# The Welfare-Maximizing Top Rate of Tax



(a)



(b)

Figure:  $t^*$  as  $e, a$  vary ( $\bar{g} = 0.25$ )

## A Simple Model of VAT Registration

- Simplified version of Liu and Lockwood (2015) : a single industry with a large number of small traders producing a homogeneous good
- Every small trader combines his own labor input with an intermediate input to produce output via a fixed coefficients technology
- Buyers have perfectly elastic demand for the good (like the assumption made implicitly in the taxable income literature that labor demand is perfectly elastic at a fixed wage.)
- This is formally equivalent to the notched income tax model.
- But MEB is the marginal excess burden on *producers* (demand is perfectly elastic)

## A Simple Model of VAT Registration

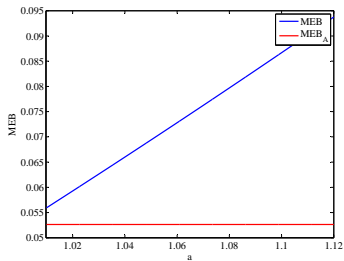
- Key variable is  $s$ , units of input required per unit of output.
- If  $s = 0$ , then the MEB of the VAT is mathematically identical to income tax case:  $MEB = \frac{e \frac{t}{1+t} + C}{1 - \frac{t}{1+t}(1+e) - C}$ .
- If  $s > 0$ , then MEB is similar, but details are more complex, because a change in the statutory rate of VAT also changes the effective tax on non-registered firms via unrecovered input VAT
- Important to consider  $s > 0$ , as empirically relevant (for the UK,  $s = 0.45$ )

# Calibration

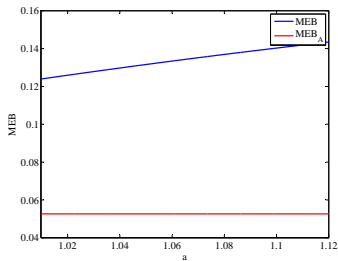
parameter	baseline value	range	sources
$e$	0.25	0.1- 0.4	SSG (2012), Kleven and Schultz (2014)
$a$	1.06		Luettmer (1995)
$t_R - t_N$	0.17/0.14		LL: $t = 0.2, s = 0.0/0.45$
$t_N$	0.0/0.16		LL: $t = 0.2, s = 0.0/0.45$
$z_0$	2.168		LL : 37.5% of firms have $z \geq z_0$

LL=Liu and Lockwood (2016)

# The Marginal Excess Burden of VAT



(a)



(b)

Figure: MEB as  $a$  varies ( $s = 0.0, 0.45$ )

## Conclusions

- We show that sufficient statistic approach does not apply to notched tax systems due to the fact that bunching response has a first-order effect on tax revenue
- Formulae for MEB and revenue-maximising top rate of tax can be written as proportional tax formulae plus a correction factor
- But, correction factor is complex (does not depend on simple sufficient statistics) and is quantitatively important
- For example, at baseline values, the MEB is underestimated by about 86%, and the revenue-maximising tax is overestimated by around 30%, and the errors can be much larger for some parameter values.
- Analysis can be applied to VAT; treating VAT as a simple proportional tax underestimates the MEB of the VAT by about 50%