

MEMO# 31500

November 27, 2018

Chairman Brady's Tax Package (Technical Corrections)

[31500]

November 27, 2018 TO: ICI MembersTax Committee SUBJECTS: Tax RE: Chairman Brady's Tax Package (Technical Corrections)

On November 26, 2018, House Ways and Means Committee Chairman Kevin Brady released the text of an [omnibus tax bill](#) that includes, among other things, technical corrections to H.R. 1, commonly referred to as the "Tax Cuts and Jobs Act of 2017."^[1]

Section 501(a) on page 186 of the bill amends section 852(b) to allow shareholders of regulated investment companies (RICs) to take into account qualified REIT dividends and qualified publicly traded partnership income which are reported by the RIC (in written statements furnished to its shareholders).^[2] The amendment also provides that if the qualified publicly traded partnership income of the company is less than zero, such income shall be reported by the company.

The amendment would take effect as if included in H.R. 1 on its date of enactment. Prospects for enactment of this bill in 2018 are uncertain.

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endnotes

^[1] See Institute Memorandum No. 30991, dated December 21, 2017, which can be found at: https://www.ici.org/my_ici/memorandum/memo30991.

^[2] See ICI Letter on Pass-Through of Qualified REIT Dividends and PTP Income Under Section 199A, dated September 27, 2018, which can be found at: https://www.ici.org/my_ici/memorandum/memo31416.

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