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world and we rank 13th in infrastructure. In order to pay for this plan, Biden is stating that he will raise taxes.

- Increase the corporate tax rate from 21% to 28% and tighten inversion regulations.
- Raise the tax on **Global Intangible Low Tax Income (GILTI)** to 21 percent, calculate it on a country-by-country basis, and eliminate the exemption of a 10 percent return on tangible investment abroad (QBAI).
- Impose a 15% minimum tax on corporate **book income**, which would be levied on a firm's financial profits instead of **taxable income** for firms with revenue over \$100 million.
- Repeal the Foreign Derived Taxable Income deduction, which incentivizes firms to move intellectual property (IP) into the U.S.
- Provide a tax credit for certain onshoring activity and deny expense deductions on jobs that were offshored.
- Increase corporate tax enforcement.
- Eliminate certain deductions and credits for the fossil fuel industry.

According to www.taxfoundation.org:

“The tax proposals in the American Jobs Plan (Biden infrastructure plan) rely on mistaken assumptions about how corporate taxes work, how corporations respond, and how workers are affected. Here are the facts:

- An increase in the federal corporate tax rate to 28 percent would raise the U.S. federal-state combined tax rate to 32.34 percent, higher than every country in the OECD, the G7, and all our major trade partners and competitors including China. This would harm U.S. economic **competitiveness** and diminish our role in the world.

- When the U.S. last had the highest corporate tax rate in the OECD, prior to tax

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Whether we use corporate tax burdens as a portion of GDP, average effective tax rates, or marginal tax rates, each measure shows that the U.S. effective corporate tax burden is close to or above the average compared to its OECD peers. Raising corporate income taxes would put the U.S. at a competitive disadvantage, [whether one looks at statutory tax rates or effective corporate tax rates.](#)"

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