

2025 - 2027

TAX EXPENDITURE REPORT

STATE OF OREGON



Governor Tina Kotek

Tina Kotek

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State of Oregon

2025-27



Tax Expenditure Report

Department of Revenue
Research Section

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GOVERNOR'S MESSAGE

Dear Fellow Oregonians -

The biennial Tax Expenditure Report is an important tool for understanding how government works towards our state's goals within Oregon's tax structure. My 2025-2027 recommended budget relies on the accuracy and predictability of our tax structure to make progress on Oregonians' top priorities.

This report, as a companion to the biennial Governor's Recommended Budget, contains important information that can help policy makers understand the broad scope of spending that occurs through tax credits and deductions. We must continue to examine the tax expenditures in this report to ensure that they are still effective, equitable, and deliver on the outcomes initially promised. Many of the tax expenditures in this report connect to existing federal tax code. If new proposals come forward at the federal level, this report should be used as an objective resource to determine whether Oregon should remain connected to specific federal tax codes.

Oregonians deserve full disclosure of how well the revenue system is working, consistent with my commitment to accountability, transparency, and excellent customer service. This report provides a factual contribution to the healthy debate of our public finance system.

Sincerely,



Governor Tina Kotek
State of Oregon

TABLE OF CONTENTS

PAGE

Introduction	1
Tax Expenditure Defined	1
Purpose of the Tax Expenditure Report	1
How to Use This Report	2
Acknowledgments	4
Summary	5
Sunsetting Tax Expenditures and Governor's Recommendations	7
Index of Tax Expenditures by Tax Program	10
Detailed Descriptions of Tax Expenditures	
Chapter 1: Personal & Corporate Income Taxes	29
Tax Expenditures in Federal Taxable Income	31
Federal Exclusions	32
Federal Adjustments	70
Federal Deductions.....	76
Other Federal Provisions (Unquantified or Disconnected).....	93
Tax Expenditures from Oregon Income Tax Provisions	96
Oregon Subtractions.....	97
Oregon Credits.....	127
Oregon Other.....	178
Chapter 2: Property Tax	187
Full Exemption	189
Partial Exemption	269
Special Assessment.....	298
Other	314
Chapter 3: Gas, Use, and Jet Fuel Taxes	315
Chapter 4: Weight-Mile Tax	323
Chapter 5: Cigarette Tax	331
Chapter 6: Other Tobacco Products Tax	335
Chapter 7: Beer and Wine Taxes	337
Chapter 8: Emergency and Crisis Services Taxes	341
Chapter 9: Corporate Activity Tax	345
Chapter 10: Electric Cooperative Tax	349
Chapter 11: Oil and Gas Privilege Tax	351
Chapter 12: Medical Provider Taxes	355
Chapter 13: Lodging Tax	361
Chapter 14: Local Construction Tax	365
Chapter 15: Estate Transfer Tax	367
Chapter 16: Marijuana Tax	375
Chapter 17: Vehicle Use Tax	377
Chapter 18: Vehicle Privilege Tax	381

TABLE OF CONTENTS

PAGE

Appendix A: Oregon Statute Requiring Tax Expenditure Report	385
Appendix B: Contributors	389
Appendix C: New, Modified, or Removed Tax Expenditures	391
Appendix D: Personal and Corporate Income Tax Expenditures	395
Index of Tax Expenditures by Keyword	409

INTRODUCTION

Oregon's 1995 Budget Accountability Act (the Act) requires the Governor, with the assistance of the Department of Revenue (DOR) and the Department of Administrative Services, to produce a tax expenditure report every biennium, along with the Governor's Budget. The report was first prepared in 1996 for the 1997–99 biennium. This report covers tax expenditures for the 2025–27 biennium.

TAX EXPENDITURE DEFINED

The Act (see ORS 291.201) defines a tax expenditure as:

any law of the federal government or of this state that exempts, in whole or in part, certain persons, income, goods, services, or property from the impact of established taxes, including, but not limited to tax deductions, tax exclusions, tax subtractions, tax exemptions, tax deferrals, preferential tax rates, and tax credits.

The term "tax expenditure" derives from the parallel between these tax provisions and direct government expenditures. For example, a program to encourage businesses to purchase pollution abatement equipment could be structured with an incentive in the form of a tax credit or a direct payment by the state to businesses.

It's not always entirely clear which provisions meet Oregon's definition of tax expenditure. For example, a law could exempt certain persons, income, goods, services, or property from the impact of a tax, but it may not be obvious whether that exemption was meant to be an *exemption from the established tax*, or if it was intended to *define the base of the established tax*.

For this report, a number of factors were considered to determine if a provision of law was included in this report. More information about the criteria used can be found on DOR's website in the associated document "Factors Used in Identifying Tax Expenditures Included in Oregon's Tax Expenditure Report."

This report describes 357 tax expenditures in 18 Oregon tax programs. Because tax expenditures impart special treatment to groups of taxpayers, it is necessary to begin with a clear explanation of how the tax generally works. Each of the 18 chapters in the report begins with a general description of the tax program, including a forecast of revenues based on current law.

In some tax programs, an alternative tax or fee is imposed for recipients of a tax expenditure. In the interest of being comprehensive, this report includes provisions involving tax relief from a specific tax, even if those taxpayers are subject to an alternative tax. The alternative taxes or fees paid are reported as *In Lieu* payments in the descriptive information for each tax expenditure.

This report provides general information about Oregon's tax expenditures. It is not intended as legal advice and is not a complete statement of Oregon laws and rules.

PURPOSE OF THE TAX EXPENDITURE REPORT

The Act declares the necessity of:

a review of the fairness and efficiency of all tax deductions, tax exclusions, tax subtractions, tax exemptions, tax deferrals, preferential tax rates, and tax credits. These types of tax expenditures are similar to direct government expenditures because they provide special benefits to favored individuals or businesses, and thus result in higher tax rates for all individuals... It is in the best interest of this state to have prepared a biennial report of tax expenditures that will allow the public and policy makers to identify and analyze tax expenditures and to periodically make criteria-based decisions on whether the expenditures should be continued. The tax expenditure report will allow tax expenditures to be debated in conjunction with on-line budgets and will result in the elimination of inefficient and inappropriate tax expenditures, resulting in greater accountability by state government and a lowering of the tax burden on all taxpayers.

The Act specifies that the report include the following information: a list of the tax expenditures; the statutory authority for each; the purpose for which each was enacted; estimates of the revenue loss for the coming biennium; the revenue loss for the preceding biennium; and a determination of whether each tax expenditure has achieved its

purpose, including an analysis of the persons who benefit from the tax expenditure. Each tax expenditure is to be categorized according to the programs or functions it supports. Finally, for those expenditures that will sunset next biennium, the report is to include the Governor’s opinion on whether the sunset should be allowed to take effect as scheduled or be revised to a different date.

HOW TO USE THIS REPORT

Organization

This report has been designed to allow a quick overview of Oregon’s current tax expenditures as well as a perusal of more extensive details. There are four main sections: the summary, the Governor’s recommendations on tax expenditures scheduled to sunset in the 2025–27 biennium, an index of all tax expenditures by tax program, and detailed descriptions of each tax expenditure (Chapters 1–18).

The [Index of Tax Expenditures by Tax Program on page 10](#) is a good starting point to identify those expenditures for which more information is desired. The numbering system can be used as an index to locate the full description of each tax expenditure in Chapters 1–18. In the PDF version of this report, blue text can be clicked on to navigate to a section or tax expenditure.

The main body of this report, Chapters 1–18, is organized by tax program. Each chapter begins with a description of that chapter’s tax and contains detailed descriptions of the tax expenditures associated with that tax program.

[Appendix A on page 385](#) and [Appendix B on page 389](#) include the full text of the Budget Accountability Act and a list of contributors to this report, including the agencies that evaluated the tax expenditures. [Appendix C on page 391](#) lists the tax expenditures that are new, modified, or that have been removed since this report was last published in 2023.

[Appendix D on page 395](#) lists the personal income tax expenditures and corporation income tax expenditures separately along with their corresponding revenue impacts. The [Index of Tax Expenditures by Keyword on page 409](#) orders tax expenditures by keyword. For example, finding “veterans” in the keyword index lists all of the tax expenditures with “veterans” in the name.

Program/Function Categories

Each tax expenditure has been assigned to one of 10 program/function categories. Wherever possible, an expenditure was categorized as one of the budget program areas used in the Governor’s Budget: Education, Human Services, Economic and Community Development, Natural Resources, Transportation, and Consumer and Business Services. Those that did not fit one of these program areas were assigned to one of four function categories: Tax Administration, Government, Social Policy, and Federal Law. Because some tax expenditures can fit neatly into more than one category, those who wish to sum the revenue impacts by program or function should be careful that they agree with these assignments or change them accordingly.

Evaluations

Personnel in many state agencies contributed to this report, including evaluating whether these tax expenditures achieve their purpose (see Appendix B). Agencies were asked to evaluate tax expenditures if the expenditure related to their program responsibility or if they had appropriate knowledge of the subject matter.

Not all tax expenditures were evaluated. Tax expenditures were generally not evaluated if:

- it has already sunset in a previous biennium
- the revenue impact estimate for any biennia is less than \$100,000
- no one qualifies for the tax expenditure
- there is no specific agency with program responsibility for the tax expenditure, or
- the tax expenditure exists for tax administration purposes only

In addition, income tax expenditures that result from Oregon’s connection to federal law are also generally not evaluated by state agencies. Instead, citations are given for the federal assessments of the federal laws.

Revenue Impacts

The revenue impact of a tax expenditure is intended to measure indirect “spending” through the tax system with respect to that one provision, or alternatively the amount of relief or subsidy being provided through that provision. The revenue impact is generally estimated as the amount of tax not collected due to the tax expenditure, but the dollar impact is NOT the amount of revenue that could be gained by repealing the tax expenditure. There are four main reasons for this:

- Many income tax credits are taken over a period of years or the taxpayer can carry forward some amount of the credit if there is insufficient tax liability to offset. Similarly, some property tax exemptions and special assessments are granted for a specified number of years which may extend beyond when the tax expenditures expire. In these and other similar cases, even if the tax expenditure were eliminated, some taxpayers would be able to continue to get a reduction in their taxes for some years after the law had sunset.
- For property taxes, when a property no longer receives an exemption, its maximum assessed value is reset. The impact of this reset is unpredictable and can lead to higher or lower tax bills going forward.
- The revenue impact estimates do not incorporate behavioral changes that may occur if a tax expenditure were eliminated.
- Each provision is estimated independently. A tax expenditure beneficiary may qualify for a tax reduction under more than one law, thus eliminating one provision might increase the use of another one.
- Administratively, governments may not be able to collect the full liability for some tax expenditures.

For these reasons, and because tax expenditures interact with each other and the rest of the tax system, caution should be used when summing the revenue impacts.

The tax expenditures reported here represent revenue loss to the state and local governments. For example, income tax expenditures reduce state General Fund revenue while property tax expenditures reduce revenue to local governments. The property tax is unique in that exempting property from property taxation may result in both a revenue loss to local governments and a shift of taxes to other taxpayers. A complete explanation of revenue loss and shift can be found at the beginning of [Property Tax on page 187](#). For all property tax expenditures, the detailed descriptions report the revenue loss and shift separately.

Revenue impact estimates are generally rounded to the nearest \$100,000. For tax expenditures with an impact greater than zero but less than \$100,000, the revenue impact is listed as “Less than \$100,000.” Revenue estimates for tax expenditures that arise from Oregon’s connection to federal income taxes are generally rounded to the nearest \$500,000, and tax expenditures with an impact greater than zero but less than \$500,000 are listed as “Less than \$500,000.”

Because tax expenditures reflect income or property that is not taxed, direct data often did not exist for estimating revenue impacts. For income tax expenditures, the primary and secondary data sources were Oregon and federal tax returns, respectively. Where appropriate, estimates of selected federal tax expenditures made by the Joint Committee on Taxation of the U.S. Congress were used as the basis for Oregon estimates. For property tax expenditures, information reported by county assessors was used whenever possible. For all tax programs, data from various federal and state agencies were used where available.

Estimates provided within this book are based on current law at the time this publication was finalized in November 2024. Current law anticipates expiration of federal tax provisions that are scheduled to expire. Several provisions are routinely reauthorized for one- or two-year periods, often retroactively. These federal tax expenditures are commonly referred to as “tax extenders” because of their routine reauthorization. Most recently, the Inflation Reduction Act of 2022 (P.L. 117-169) extended a few federal provisions but also modified and added others. (Several more federal tax code modifications, though no “extenders”, were enacted by the SECURE 2.0 Act of 2022, which was part of the omnibus legislative package of the Consolidated Appropriations Act of 2023, P.L. 117-328.) Future extension of expired or expiring federal provisions, most notably ones associated with the Tax Cuts and Jobs Act of 2017 (P.L. 115-97), could directly affect the revenue impact of those provisions. Because of the interactive effects between tax expenditures and the other reasons detailed above, revenue estimates should be viewed as orders of magnitude.

Who Benefits

Where possible, this report provides information about the beneficiaries of tax expenditures using the most recent tax return data available. For corporation returns, 2021 is the most recent complete tax year available; for personal income tax returns, 2022 is the most recent complete tax year available; and, for property tax information, tax year 2023–24 is the most recent year available. Note that these numbers are a snapshot at the time this report was published and could change as returns are amended, filed late, or changed as a result of an audit.

Where data is available for individual income tax provisions, we provide distributional tables by income for claimants. The term "filer" used in these tables corresponds to a filed return (either single or joint). For example, a return comprised of two people filing jointly would be reflected in the tables as one filer.

ACKNOWLEDGMENTS

Although the Department of Revenue coordinated the construction of this report, numerous Oregon state agencies provided important information and analysis regarding the objectives and effectiveness of individual tax expenditures. These agencies are listed in Appendix B.

The Congressional Research Service publication, *Tax Expenditures: Compendium of Background Material on Individual Provisions*, is used extensively throughout this report to describe and evaluate the tax expenditures that result from Oregon's connection to the federal income tax. Estimates of federal tax expenditures made by the Joint Committee on Taxation of the U.S. Congress were used to estimate many tax expenditures that result from Oregon's connection to the federal income tax.

SUMMARY

This report describes 357 individual tax expenditures currently specified in Oregon and federal law. Of those, 167 are related to Oregon’s personal and corporation income taxes and 140 are related to local property taxes. The remaining 50 are related to various other state tax programs. Of the 167 income tax expenditures, 84 result from Oregon’s connection to the federal income tax code. Oregon is tied to the federal definition of taxable income, except for a few provisions for which Oregon has explicitly disconnected. By adopting the federal definition of income, Oregon also adopts most of the exclusions and deductions from income that are part of federal personal and corporation income taxes.

It is also important to note that there are several extremely large single tax expenditures in both the property and income tax programs that influence these totals. For example, for 2025–27, roughly \$7.3 billion of the nearly \$13.5 billion of tax expenditures in the property tax program is related to three property tax expenditures: [2.078, State and Local Property](#) (\$3.6 billion), [2.072, Personal Property for Personal Use](#) (\$2.2 billion), and [2.063, Motor Vehicles and Trailers](#) (\$1.5 billion). Similarly, the three largest income tax expenditures ([1.007, Employer Paid Medical and Cafeteria Plan Benefits](#); [1.307, Social Security Benefits \(Oregon\)](#); and [1.008, Pension Contributions and Earnings](#)) account for about \$7.3 billion of the total \$18.0 billion for all income tax expenditures.

In addition, some tax expenditures included in this report fit the statutory definition of tax expenditure but do not fit as easily into the framework of “spending” through the tax system. For example, the federal government prohibits state and local governments from taxing certain income (such as [1.324, Income Earned in "Indian Country"](#)) or property (such as [2.093, Federal Property](#)). These “tax expenditures” do not represent the same explicit policy decisions as some of the more direct Oregon subtractions and credits.

SUMMARY OF OREGON TAX PROGRAMS WITH TAX EXPENDITURES (\$ Millions)

Tax Program	Number of Expenditures	Estimated Revenues 2025-27	Revenue Impact	
			2023-25	2025-27
Income (Personal and Corporate)	167	32,401	16,507	18,093
Federal Exclusions	54		8,527	9,468
Federal Adjustments/Deductions	30		3,130	3,316
Oregon Subtractions	30		2,931	3,356
Oregon Credits	45		1,660	1,683
Other Oregon Provisions	8		260	272
Property	140	20,418	12,540	13,442
Full Exemptions	94		11,024	11,878
Partial Exemptions	31		879	874
Special Assessment	14		642	700
Other	1		0	0
All Other Oregon Taxes with Tax Expenditures	50	8,090	622	628
All Oregon Taxes with Tax Expenditures	357	60,909	29,675	32,174

For reasons explained in [Revenue Impacts on page 3](#), there are difficulties with summing tax expenditures. This table is intended only to provide rough orders of magnitudes for large groups of tax expenditures and caution should be exercised when adding revenue impacts.

SUNSETTING TAX EXPENDITURES AND GOVERNOR'S RECOMMENDATIONS

Many tax laws are explicitly written with a limited period of applicability; the last day the law is in effect is referenced in this book as the **sunset date**. In addition to explicit sunsets written into statute, ORS 315.037 specifies sunsets for recently enacted tax expenditures:

- (1) As used in this section, “tax expenditure” has the meaning given that term in ORS 291.201.
- (2) Any tax credit enacted by the Legislative Assembly on or after January 1, 2010, shall apply for a maximum of six tax years beginning with the initial tax year for which the credit is applicable, unless the Legislative Assembly expressly provides for another period of applicability.
- (3) Any tax expenditure enacted by the Legislative Assembly on or after January 1, 2014, shall apply for a maximum of six tax years beginning with the initial tax year for which the tax expenditure is applicable, unless the Legislative Assembly expressly provides for another period of applicability.

ORS 315.037 has added two sources of uncertainty to identification and reporting of sunset dates. The first source of uncertainty is the statutory definition of tax expenditure in ORS 291.201. The definition is difficult to apply because it relies on identifying exemptions from an “established tax,” which is undefined. The second source of uncertainty is that “period of applicability” is not defined for purposes of ORS 315.037.¹ For provisions in this report that have an unclear sunset status, the source of uncertainty is noted in the description of the provision.

GOVERNOR'S RECOMMENDATIONS

ORS 291.214 requires that the Governor’s Tax Expenditure Report:

Identify each tax expenditure that has a full or partial sunset that, if allowed to take effect, will have a fiscal impact on the state or on school districts for the next biennium, and shall prepare a recommendation as to each tax expenditure identified under this paragraph that indicates the Governor’s opinion on whether the full or partial sunset of the tax expenditure should be allowed to take effect as scheduled or should be revised to a different date.

According to Oregon statute “full sunset” means any provision that completely eliminates an existing tax expenditure on a specified date, while “partial sunset” means any provision that reduces the amount of an existing tax expenditure or that alters the eligibility requirements for the expenditure as of a specified date. On the following pages are the 20 tax expenditures that are set to expire during the 2025–27 biennium, and the Governor’s recommendation as to whether the specific tax provision should be allowed to sunset as scheduled, or have the sunset date changed. The table includes the revenue impact the tax expenditure will have under current law, and the additional cost if the tax expenditure were extended through the end of the 2025–27 biennium. For more details on these tax expenditures, see their entries in the full report.

1. For example, many statutes have language such as “This Act applies to tax years beginning on or after January 1, 2023 and before January 1, 2029,” which suggests a clear period in which the tax expenditure is applicable. Other statutes have language like this: “This Act applies to tax years beginning on or after January 1, 2023.” It is unclear if the absence of the end date, as shown in the latter example, implies that the Legislature intended the six-year limit from ORS 315.037 to apply.

TAX EXPENDITURES SCHEDULED FOR SUNSET IN 2025-27

As part of the 1995 Budget Accountability Act, the governor is required to identify each tax expenditure that has a full or partial sunset occurring in the coming biennium and prepare a recommendation that indicates whether the full or partial sunset should be allowed to take effect. Below are those tax expenditures.

	TAX EXPENDITURE NAME	TYPE	SUNSET	2025-27 REVENUE IMPACT (\$000)*	2025-27 COST TO EXTEND (\$000)*	GOVERNOR'S RECOMMENDATION
1.303	AmeriCorps Awards	Income Tax Subtraction	12-31-2026	Less than 100	Less than 100	Extend Sunset
1.313	Manufactured Dwelling Park Capital Gain	Income Tax Subtraction	12-31-2025	300	600	Extend Sunset
1.314	First-time Home Buyer Savings	Income Tax Subtraction	12-31-2026	3,000	1,000	Extend Sunset
1.317	Personal Casualty Loss	Income Tax Subtraction	12-31-2025	200	0	Extend Sunset
1.318	Wildfire Judgment or Settlement and Legal Fees	Income Tax Subtraction	12-31-2025	Not Available	Not Available	Extend Sunset
1.406	Earned Income Credit	Income Tax Credit	12-31-2025	54,300	54,400	Extend Sunset
1.425	Manufactured Dwelling Park Closure	Income Tax Credit	12-31-2025	Less than 100	Less than 100	Extend Sunset
1.431	Crop Donation	Income Tax Credit	12-31-2025	200	100	Extend Sunset
1.445	Certain Retirement Income	Income Tax Credit	12-31-2025	400	400	Extend Sunset
2.015	Brownfield Development	Property Tax Exemption	01-01-2027	Less than 100	Less than 100	Extend Sunset
2.026	Cargo Containers	Property Tax Exemption	06-30-2026	Less than 100	Less than 100	Extend Sunset
2.102	Vertical Housing Development Zone	Partial Property Tax Exemption	12-31-2025	12,900	8,800	Extend Sunset
2.108	Nonprofit Low-Income Rental Housing	Partial Property Tax Exemption	06-30-2027	45,400	0	Extend Sunset
2.109	New or Rehabilitated Multi-Unit Rental Housing	Partial Property Tax Exemption	01-02-2027	Less than 100	Less than 100	Extend Sunset
3.003	Vehicle Used for Testing Emissions (Gas and Use Fuel Taxes)	Gas, Use, and Jet Fuel Taxes Exclusion	12-31-2025	0	0	Extend Sunset

* The revenue impact includes the effect of the currently scheduled sunset. The cost to extend is the additional revenue impact if the tax expenditure is extended.

TAX EXPENDITURES SCHEDULED FOR SUNSET IN 2025-27

As part of the 1995 Budget Accountability Act, the governor is required to identify each tax expenditure that has a full or partial sunset occurring in the coming biennium and prepare a recommendation that indicates whether the full or partial sunset should be allowed to take effect. Below are those tax expenditures.

	TAX EXPENDITURE NAME	TYPE	SUNSET	2025-27 REVENUE IMPACT (\$000)*	2025-27 COST TO EXTEND (\$000)*	GOVERNOR'S RECOMMENDATION
4.003	Vehicle Used for Testing Emissions (Weight-Mile Tax)	Weight-Mile Tax Exclusion	12-31-2025	200	500	Extend Sunset
7.003	Oregon Grapes for Wine Without Oregon Designation or AVA	Beer and Wine Tax Exclusion	06-30-2027	Less than 100	Less than 100	Extend Sunset
9.001	Sales of Prescription Drugs by Eligible Pharmacies	Corporate Activity Tax Exclusion	12-31-2025	4,600	4,700	Extend Sunset
9.002	Subcontractor Labor Payments for Residential Construction	Corporate Activity Tax Exclusion	12-31-2025	900	1,000	Extend Sunset
9.004	Insurers Subject to Retaliatory Tax	Corporate Activity Tax Exclusion	12-31-2026	Not Available	Not Available	Extend Sunset

* The revenue impact includes the effect of the currently scheduled sunset. The cost to extend is the additional revenue impact if the tax expenditure is extended.

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
Personal & Corporate Income Taxes						
<i>Federal Exclusions</i>						
1.001	Scholarship and Fellowship Income	Education	1954	316.048	34,000	38,000
1.002	Qualified Education Savings (Federal)	Education	1996	316.048	41,000	43,000
1.003	Exclusion of Employer-Provided Tuition Reduction	Education	1984	316.048	2,000	2,500
1.004	Certain Foster Care Payments	Human Services	1982	316.048	4,000	4,000
1.005	Employee Adoption Benefits	Human Services	1996	316.048	Less than 500	Less than 500
1.006	Compensatory Damages	Human Services	1918	316.048	16,000	15,000
1.007	Employer Paid Medical and Cafeteria Plan Benefits	Human Services	1918 and 1978	316.048	1,800,000	1,800,000
1.008	Pension Contributions and Earnings	Human Services	1921	316.048	3,100,000	3,900,000
1.009	Social Security Benefits (Federal)	Human Services	1938	316.048	898,000	972,000
1.010	Regional Economic Development Incentives	Economic/Community	1993	316.048, 317.013	Less than 500	Less than 500
1.011	Capital Gain Invested in Opportunity Zone	Economic/Community	2017	316.048, 317.013	23,000	2,500
1.012	Exclusion of Gain from Certain Small Business Stock	Economic/Community	1993	316.048	78,000	77,000
1.013	Imputed Interest Rules	Economic/Community	1984	316.048, 317.013	7,500	8,000
1.014	Employer Provided Dependent Care	Economic/Community	1981	316.048	7,000	9,000
1.015	Capital Gains on Home Sales	Economic/Community	1997	316.048	450,000	470,000
1.016	Income Earned Abroad by U.S. Citizens	Economic/Community	1926	316.048	50,000	51,000
1.017	Cancellation of Mortgage Debt	Economic/Community	2007	316.048	1,500	Less than 500
1.018	Employer Paid Group Life Insurance Premiums	Economic/Community	1920	316.048	35,000	36,000
1.019	Employer Paid Accident and Disability Insurance	Economic/Community	1954	316.048	54,000	57,000

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.020	Employer Provided On-Site Gyms	Economic/Community	1984	316.048	16,000	15,000
1.021	Miscellaneous Fringe Benefits	Economic/Community	1984	316.048	82,000	81,000
1.022	Employee Meals and Lodging (Nonmilitary)	Economic/Community	1918	316.048	89,000	83,000
1.023	Employee Stock Ownership Plans	Economic/Community	1974	316.048, 317.013	50,000	52,000
1.024	Employee Awards	Economic/Community	1986	316.048	4,000	4,000
1.025	Employer Provided Education Benefits	Economic/Community	1978	316.048	14,000	11,000
1.026	Spread on Acquisition of Stock	Economic/Community	1981	316.048	9,500	10,000
1.027	Meal and Entertainment Expenses	Economic/Community	1962	316.048	7,500	8,000
1.028	Veterans' Benefits and Services	Economic/Community	1917	316.048	160,000	170,000
1.029	Military and Dependents TRICARE Insurance	Economic/Community	1925	316.048	98,000	110,000
1.030	Cash Accounting, Other than Agriculture	Economic/Community	1916	316.048, 317.013	21,000	20,000
1.031	Inventory Methods of Valuation	Economic/Community	1938	316.048, 317.013	13,000	13,000
1.032	Energy Conservation Subsidies (Federal)	Natural Resources	1992	316.048	500	500
1.033	Pass-Through Status of Specified Publicly Traded Partnerships	Natural Resources	1987	317.013	4,500	6,500
1.034	Employer Paid Transportation Benefits	Transportation	1984	316.048	53,000	52,000
1.035	Certain Disaster Mitigation Payments	Consumer and Business Services	2005	316.048, 317.013	1,000	500
1.036	Credit Union Income	Consumer and Business Services	1951	317.080(1)	32,000	37,000
1.037	Elimination of Tax Exempt Interest Allocation for Banks	Consumer and Business Services	2009	317.013	4,500	4,500
1.038	Workers' Compensation Benefits (Medical)	Consumer and Business Services	1918	316.048	37,000	44,000
1.039	Workers' Compensation Benefits (Nonmedical)	Consumer and Business Services	1918	316.048	25,000	23,000
1.040	Gain on Nondealer Installment Sales	Tax Administration	1921	316.048, 317.013	49,500	53,500
1.041	Gain on Like-Kind Exchanges	Tax Administration	1921	316.048, 317.013	108,000	95,500

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.042	Allowances for Federal Employees Abroad	Government	1943	316.048	4,000	4,000
1.043	Interest on Oregon State and Local Debt	Government	1913	316.048	40,400	41,600
1.044	Voluntary Employees' Beneficiary Associations	Social Policy	1928	316.048	16,000	16,000
1.045	Rental Allowances for Clergy Housing	Social Policy	1921	316.048	7,500	7,500
1.046	Discharge of Certain Student Loan Debt	Social Policy	1984	316.048	12,000	6,500
1.047	Capital Gains on Inherited Property	Social Policy	1921	316.048	690,000	730,000
1.048	Capital Gains on Gifts	Social Policy	1921	316.048	49,000	40,000
1.049	Life Insurance Proceeds	Social Policy	1913	316.048, 317.013	135,000	146,000
1.050	Disability Benefits of Military and Victims of Terrorism	Social Policy	1942	316.048	3,000	3,500
1.051	Benefits and Allowances of Armed Forces Personnel	Social Policy	1925	316.048	64,000	66,000
1.052	Combat Pay	Social Policy	Pre-1945	316.048	6,500	7,500
1.053	Deferral of Interest on Savings Bonds	Social Policy	1951	316.048	4,000	3,500
1.054	Deferral of Certain Advance Payments	Federal Law	2017	316.048, 317.013	15,500	16,500
<i>Federal Adjustments</i>						
1.101	Teacher Classroom Expenses	Education	2002	316.048	1,900	1,900
1.102	Interest on Student Loans	Education	1997	316.048	18,200	38,000
1.103	Self-Employment Health Insurance	Human Services	1986	316.048	83,000	84,600
1.104	Health Savings Accounts	Human Services	2003	316.048	92,000	110,000
1.105	IRA Contributions and Earnings	Human Services	1974	316.048	220,000	280,000
1.106	Moving Expenses	Economic/Community	1964	316.048	100	3,500
1.107	Overnight Travel Expenses of National Guard and Reserve Members	Social Policy	2003	316.048	2,000	2,000

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
<i>Federal Deductions</i>						
1.201	Medical and Dental Expenses	Human Services	1942	316.695	255,000	288,000
1.202	Removal of Architectural Barriers	Human Services	1976	316.048, 317.013	Less than 500	Less than 500
1.203	Deduction of Certain Film and Television Production Costs	Economic/Community	2004	316.048, 317.013	500	Less than 500
1.204	Accelerated Depreciation of Certain Buildings	Economic/Community	1954	316.048, 317.013	5,000	4,500
1.205	Accelerated Depreciation of Equipment	Economic/Community	1954	316.048, 317.013	133,000	3,500
1.206	Section 179 Expensing Allowances	Economic/Community	1958	316.048, 317.013	45,000	47,000
1.207	Amortization of Business Start-Up Costs	Economic/Community	1980	316.048, 317.013	1,000	1,500
1.208	Foreign-Derived Intangible Income	Economic/Community	2017	317.013	120,000	110,000
1.209	Accelerated Depreciation of Rental Housing	Economic/Community	1954	316.048, 317.013	37,000	27,000
1.210	Home Mortgage Interest	Economic/Community	1913	316.695	962,000	1,010,000
1.211	Property Taxes	Economic/Community	1913	316.695	587,000	656,000
1.212	Soil and Water Conservation Expenditures	Natural Resources	1954	316.048, 317.013	500	500
1.213	Fertilizer and Soil Conditioner Costs	Natural Resources	1960	316.048, 317.013	500	500
1.214	Extended Carryback of Farming Loss	Natural Resources	1999	316.048	500	500
1.215	Intangible Development Costs for Fuels	Natural Resources	1954	316.695, 317.013	3,000	2,000
1.216	Amortization of Air Pollution Control Facilities	Natural Resources	2005	317.013	Less than 500	Less than 500
1.217	Expensing Timber-Growing Costs	Natural Resources	1986	316.048, 317.013	2,500	2,500
1.218	Expensing and Amortization of Reforestation Costs	Natural Resources	1980	316.048, 317.013	500	500
1.219	Magazine Circulation Expenditures	Tax Administration	1950	316.048, 317.013	Less than 500	Less than 500
1.220	Completed Contract Rules	Tax Administration	1986	316.048, 317.013	7,500	8,500
1.221	Charitable Contributions	Social Policy	1917 and 1935	316.695, 317.013	543,000	605,000

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.222	Casualty and Theft Losses	Social Policy	1913	316.695	400	2,200
1.223	Local Income Taxes	Social Policy	1913	316.695	8,700	26,100
<i>Oregon Subtractions</i>						
1.301	Oregon 529 College Savings Network	Education	1999	316.699	1,300	0
1.302	Scholarship Awards Used for Housing Expenses	Education	1999	316.846	1,400	1,400
1.303	AmeriCorps Awards	Education	2021	316.847	Less than 100	Less than 100
1.304	Medical Subtraction for Elderly	Human Services	2013	316.693	55,000	55,000
1.305	Additional Deduction for Elderly or Blind	Human Services	1989	316.695(7)	28,300	29,600
1.306	ABLE Account Contributions	Human Services	2015	316.699	Less than 100	0
1.307	Social Security Benefits (Oregon)	Human Services	1985	316.054	1,350,000	1,560,000
1.308	Film Production Labor Rebate	Economic/Community	2005	316.698, 317.394	1,000	1,000
1.309	Artist's Charitable Contribution	Economic/Community	1979	316.838	Less than 100	Less than 100
1.310	Oregon Investment Advantage	Economic/Community	2001	316.778, 317.391	Not Available	Not Available
1.311	Dividend Received from an IC-DISC	Economic/Community	2013	316.749(1)	13,200	14,100
1.312	Individual Development Accounts (Exclusion and Subtraction)	Economic/Community	1999	316.848	Less than 100	Less than 100
1.313	Manufactured Dwelling Park Capital Gain	Economic/Community	2005	Ore. Laws 2005 c.826 §6-10	900	300
1.314	First-time Home Buyer Savings	Economic/Community	2018	316.798	1,100	3,000
1.315	Manufactured Dwelling Tenant Payment	Economic/Community	2007	316.795, 317.092	Less than 100	Less than 100
1.316	Interest from State and Local Government Bonds	Economic/Community	1987	316.056	300	300
1.317	Personal Casualty Loss	Economic/Community	2023	316.850	600	200
1.318	Wildfire Judgment or Settlement and Legal Fees	Economic/Community	2024	Ore. Laws 2024 c.50	Not Available	Not Available
1.319	Depletion Costs for Metal Mines	Natural Resources	Pre-1953	317.374	Less than 100	Less than 100
1.320	Energy Conservation Subsidies (Oregon)	Natural Resources	1981	316.744, 317.386	Less than 100	Less than 100

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.321	Agriculture Sector Net Operating Loss Carryback	Natural Resources	2022	Ore. Laws 2022 c.82 §12-15	10,700	19,300
1.322	Wet Marine and Transportation Policies	Consumer and Business Services	1995	317.080(8)	2,500	2,500
1.323	Hydroelectric Dam and Waterway Workers	Tax Administration	1997	316.127(8), (10)	Not Available	Not Available
1.324	Income Earned in "Indian Country"	Government	1977	316.777	8,600	9,300
1.325	Federal Pension Income	Government	1998	316.680(1)(e)	129,000	129,000
1.326	Legislative Per Diem and Allowance	Government	1967	171.072(7)	100	100
1.327	Oregon State Lottery Prizes	Government	1985	461.560	400	500
1.328	Federal Income Tax Subtraction	Social Policy	1929	316.680(1)(b), 316.685, 316.695	1,200,000	1,420,000
1.329	Military Active Duty and Related Pay	Social Policy	1969	316.792	47,200	48,100
1.330	Interest and Dividends on U.S. Obligations	Federal Law	1970	316.680(1)(a)	79,000	62,000
<i>Oregon Credits</i>						
1.401	Employer Provided Scholarships	Education	2001	315.237	Less than 100	Less than 100
1.402	Contributions of Computer Equipment	Education	1985	317.151	Less than 100	Less than 100
1.403	Opportunity Grant Fund Contributions	Education	2018	315.643	Not Available	Not Available
1.404	Employee Training	Education	2017	315.523	Less than 100	Less than 100
1.405	Contributions to 529 Account	Education	2019	315.650	17,600	17,600
1.406	Earned Income Credit	Human Services	1997	315.266	106,000	54,300
1.407	Child with a Disability	Human Services	1985	316.099(3)	8,700	8,700
1.408	Rural Medical Practice	Human Services	1989	315.613, 315.616, 315.619	11,800	11,000
1.409	Volunteer Rural Emergency Medical Providers	Human Services	2005	315.622	100	100
1.410	Severe Disability	Human Services	1985	316.758	7,800	7,800
1.411	Contributions to ABLE Account	Human Services	2019	315.650	600	600
1.412	Oregon Kids Credit	Human Services	2023	315.273	78,100	79,600
1.413	Farmworker Housing Lender's Credit	Economic/Community	1989	317.147	Less than 100	0

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.414	Agriculture Workforce Housing Construction	Economic/Community	1989	315.164	7,300	10,000
1.415	Film Production Development Contributions	Economic/Community	2003	315.514, 315.516	38,800	38,800
1.416	Renewable Resource Equipment Manufacturing Facilities	Economic/Community	2011	315.341	Less than 100	Less than 100
1.417	Oregon Low-Income Community Jobs Initiative	Economic/Community	2011	315.533(2)	Not Available	Not Available
1.418	Long Term Rural Enterprise Zone Facilities (Income Tax)	Economic/Community	1997	317.124	Not Available	Not Available
1.419	Reservation Enterprise Zone (Income Tax)	Economic/Community	2001	315.506	Less than 100	Less than 100
1.420	Public University Venture Development Fund	Economic/Community	2005	315.640	200	200
1.421	Working Family Household and Dependent Care	Economic/Community	2015	315.264	34,300	34,200
1.422	Contributions to Office of Child Care	Economic/Community	2001	315.213	Less than 100	Less than 100
1.423	Individual Development Account Donation (Credit)	Economic/Community	1999	315.271	13,400	13,700
1.424	Oregon Affordable Housing Lender's Credit	Economic/Community	1989	317.097	15,000	16,000
1.425	Manufactured Dwelling Park Closure	Economic/Community	2007	316.090	Less than 100	Less than 100
1.426	Qualified Research Expenses for Semiconductor Companies	Economic/Community	2023	315.518, 315.519	23,900	55,500
1.427	Publicly Supported Housing Seller's Credit	Economic/Community	2023	315.283	Not Yet Available	Not Yet Available
1.428	Agricultural Worker Overtime	Natural Resources	2022	315.133	19,600	50,400
1.429	Small Forest Owner Forest Conservation (Income Tax)	Natural Resources	2022	315.124	Not Available	Not Available
1.430	Bovine Manure	Natural Resources	2017	315.176(3)(a)	Less than 100	Less than 100
1.431	Crop Donation	Natural Resources	1977	315.156	300	200
1.432	Energy Conservation Lender's Credit	Natural Resources	1981	317.112	Less than 100	Less than 100
1.433	Transportation Projects	Natural Resources	2011	315.336(1)	Less than 100	0
1.434	Alternative Energy Devices (Residential)	Natural Resources	1977	316.116	200	Less than 100
1.435	Business Energy Facilities, Conservation and Renewables	Natural Resources	1979	315.354	300	Less than 100

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.436	Energy Conservation Projects	Natural Resources	2011	315.331(1)	Less than 100	Less than 100
1.437	Weatherization Lender's Credit	Natural Resources	1977	317.111	Less than 100	Less than 100
1.438	Fish Screening Devices	Natural Resources	1989	315.138	Less than 100	Less than 100
1.439	Short Line Railroad Rehabilitation	Transportation	2019	315.593	Not Available	Not Available
1.440	Oregon Life and Health IGA Assessments	Consumer and Business Services	1975	734.835	700	200
1.441	Political Contributions	Government	1969	316.102	6,000	4,600
1.442	Oregon Cultural Trust	Social Policy	2001	315.675	8,500	8,800
1.443	Personal Exemption	Social Policy	1985	316.085	1,260,000	1,270,000
1.444	Oregon Veterans' Home Physicians	Social Policy	2007	315.624	Less than 100	Less than 100
1.445	Certain Retirement Income	Social Policy	1991	316.157	900	400
<i>Oregon Other</i>						
1.501	Public Warehouse Sales Throwback Exemption	Economic/Community	2005	314.665	Less than 100	Less than 100
1.502	Tax Rates for Certain Pass-Through Income	Economic/Community	2013	316.043(2)	242,000	253,000
1.503	Income Averaging for Farmers	Natural Resources	2001	314.297	1,300	1,300
1.504	Capital Gains from Farm Property	Natural Resources	2001	316.045, 317.063, 318.020	4,700	5,200
1.505	Nonresident Disaster Related Income	Consumer and Business Services	2015	401.690	Not Available	Not Available
1.506	Apportionment for Utility and Telecommunication Companies	Consumer and Business Services	2001	314.280	800	800
1.507	Nonresident Armed Forces	Social Policy	1942	50 U.S.C. § 4001	11,100	11,800
1.508	Nonresident Spouse of Nonresident Servicemember Serving in Oregon	Social Policy	2009	50 U.S.C. § 4001	Not Available	Not Available

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
Property Tax						
<i>Full Exemptions</i>						
2.001	Academies, Day Care, and Student Housing	Education	1957	307.145	78,800	85,500
2.002	Student Housing Furnishings	Education	1957	307.195	Less than 100	Less than 100
2.003	Leased Student Housing Publicly Owned	Education	1947	307.110(3)(a)	37,200	41,800
2.004	Higher Education Parking Space	Education	1989	307.110(3)(f)	Incl. in 2.078	Incl. in 2.078
2.005	Private Libraries for Public Use	Education	1854	307.160	Less than 100	Less than 100
2.006	Leased Rural Health Care Property	Human Services	1999	307.110(3)(i)	400	500
2.007	Senior Services Centers	Human Services	1993	307.147	400	500
2.008	Land Owned by Nonprofit for Purpose of Building Low-Income Housing	Economic/Community	2015	307.513	100	100
2.009	Agricultural Housing and Day Care Facilities	Economic/Community	1973	307.485	800	900
2.010	Fairground Leased Storage Space	Economic/Community	1987	307.110(3)(d), (e)	Less than 100	Less than 100
2.011	Commercial Buildings Under Construction	Economic/Community	1959	307.330	77,000	84,500
2.012	Construction in Process in an Enterprise Zone	Economic/Community	2003	285C.170	Incl. in 2.011	Incl. in 2.011
2.013	Enterprise Zone Businesses	Economic/Community	1985	285C.175	98,100	190,000
2.014	Long Term Rural Enterprise Zone (Property Tax)	Economic/Community	1997	285C.409	356,000	389,000
2.015	Brownfield Development	Economic/Community	2016	Ore. Laws 2016 c.96, 2019 c.492	Less than 100	Less than 100
2.016	New Industrial Property in Rural Areas	Economic/Community	2016	Ore. Laws 2016 c.112, 2018 c.111 §15, 2019 c.575	Less than 100	Less than 100
2.017	Industry Apprenticeship/ Training Trust	Economic/Community	1983	307.580	1,500	1,600
2.018	Rural Renewable Energy Development Zone	Economic/Community	2003	285C.362	5,300	10,700
2.019	Housing Authority Rental Properties	Economic/Community	1937	307.092	39,100	44,300

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
2.020	Local Government Owned Low-Income Housing	Economic/Community	2013	307.110(3)(h)	3,900	4,300
2.021	Federal Land Under Summer Homes	Economic/Community	1975	307.183 to 307.184	Not Available	Not Available
2.022	Federal Land Under Recreation Facility	Economic/Community	1975	307.182	100	100
2.023	Nonprofit Elderly Housing State Funded	Economic/Community	1977	307.242	3,400	3,600
2.024	Inventory	Economic/Community	1969	307.400	925,000	981,000
2.025	Business Personal Property and Residential Floating Structures	Economic/Community	1979	308.250(2)(a)	10,500	11,400
2.026	Cargo Containers	Economic/Community	1979	307.835	200	Less than 100
2.027	Leased Docks and Airports	Economic/Community	1947	307.120	12,800	13,900
2.028	Ship Repair Facility Materials	Economic/Community	1957	308.256(7)	Incl. in 2.024	Incl. in 2.024
2.029	Railroad Cars Being Repaired	Economic/Community	1973	308.665	900	1,000
2.030	Low-Income Housing Owned by Religious Organization	Economic/Community	2021	307.140(4)	Incl. in 2.087	Incl. in 2.087
2.031	New ADU or Newly Converted Multiplex	Economic/Community	2023	Ore. Laws 2023 c.583	200	400
2.032	Food Processing Equipment	Natural Resources	2005	307.455	13,600	18,500
2.033	Farm Machinery and Equipment	Natural Resources	1973	307.394	109,000	115,000
2.034	Mobile Field Incinerators	Natural Resources	1971	307.390	Incl. in 2.033	Incl. in 2.033
2.035	Crops, Plants, and Fruit Trees	Natural Resources	1957	307.320	16,600	18,100
2.036	Agricultural Products Held by the Farmer	Natural Resources	1965	307.325	100	100
2.037	Nursery Stock	Natural Resources	1971	307.315	4,700	5,100
2.038	Leased State and Local Farming and Grazing Land	Natural Resources	1971	307.110(3)(b)	Incl. in 2.078	Incl. in 2.078
2.039	Leased Federal Grazing Land	Natural Resources	1961	307.060	Incl. in 2.093	Incl. in 2.093
2.040	Shellfish Growing on State Land	Natural Resources	1969	622.290	Less than 100	Less than 100
2.041	Center Pivot Irrigation Equipment	Natural Resources	1973	307.398	Incl. in 2.033	Incl. in 2.033
2.042	Other Farm/Aquaculture/ Egg Equipment	Natural Resources	1973	307.397	Incl. in 2.033	Incl. in 2.033
2.043	Field Burning Smoke Management Equipment	Natural Resources	1973	307.391	Incl. in 2.033	Incl. in 2.033

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
2.044	Crab Pots	Natural Resources	1969	508.270	400	500
2.045	Land Leased From State Land Board	Natural Resources	1982	307.168	2,600	2,700
2.046	Natural Gas Pipeline Extension	Natural Resources	2007	307.107	Less than 100	Less than 100
2.047	Solar Projects	Natural Resources	2015	Ore. Laws 2015 c.571, 2019 c.628, 2021 c.571	7,500	8,200
2.048	Cooperative Providing Heat by Combustion of Biomass	Natural Resources	2019	308.521	Not Available	Not Available
2.049	Nonprofit Sewage Treatment Facilities	Natural Resources	1997	307.118	Less than 100	Less than 100
2.050	Riparian Habitat Land	Natural Resources	1981	308A.362	400	400
2.051	Environmentally Sensitive Logging Equipment	Natural Resources	1999	307.827	6,900	7,400
2.052	Skyline and Swing Yarders	Natural Resources	1999	307.831	Incl. in 2.051	Incl. in 2.051
2.053	Forest Fire Protection Association	Natural Resources	1957	307.125	300	400
2.054	Federal Standing Timber Under Contract	Natural Resources	1965	307.050	1,800	1,900
2.055	State and Local Standing Timber Under Contract	Natural Resources	1965	307.100	1,500	1,600
2.056	Western Private Standing Timber	Natural Resources	1977	321.272	455,000	489,000
2.057	Eastern Private Standing Timber	Natural Resources	1961	321.829	32,500	34,900
2.058	Private Farm and Logging Roads	Natural Resources	1963	308.236	45,300	49,000
2.059	Nonprofit Public Park Use Land	Natural Resources	1971	307.115	300	400
2.060	Inactive Mineral Interests	Natural Resources	1997	308.115	Less than 100	Less than 100
2.061	Mining Claims on Federal Land	Natural Resources	1898	307.080	600	600
2.062	Small Watercraft	Natural Resources	1959	830.790(3)	66,300	67,700
2.063	Motor Vehicles and Trailers	Transportation	1921	803.585	1,510,000	1,570,000
2.064	ODOT Land Under Use Permit	Transportation	1981	307.110(3)(c)	0	0
2.065	Tollways and Related Facilities	Transportation	1995	383.017(1)	0	0
2.066	Foreign-Owned Aircraft and Aircraft Not Owned by Air Transportation Companies	Transportation	1987	308.558(4), (5)	30,500	31,100

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
2.067	Nonprofit Water Associations	Consumer and Business Services	1937	307.210	300	300
2.068	Nonprofit Electrical Distribution Associations	Consumer and Business Services	1943	308.805	27,700	32,500
2.069	Property Used for Disaster or Emergency Related Work	Consumer and Business Services	2015	401.690(1)(d)	Not Available	Not Available
2.070	Beverage Containers Requiring Deposit	Tax Administration	1983	307.402	Less than 100	Less than 100
2.071	Manufactured Structure in High-Population County	Tax Administration	2010	308.250(2)(b), (3)	7,600	7,700
2.072	Personal Property for Personal Use	Tax Administration	1854	307.190	2,080,000	2,230,000
2.073	Heavy Equipment Rental	Tax Administration	2018	307.872	13,100	13,900
2.074	Beach Lands	Government	1969	307.450	Not Available	Not Available
2.075	Property of Indians and on Tribal Trust Land	Government	1854	307.180, 307.181(1), 307.181(2)	Not Available	Not Available
2.076	Equipment for Maritime Emergency Response	Government	2010	307.197	Less than 100	Less than 100
2.077	Interstate Bridges of Local Governments	Government	2017	381.310(10)(a)	0	0
2.078	State and Local Property Corporations for Irrigation, Drainage, Water Supply or Flood Control	Government	1854	307.090	3,350,000	3,620,000
2.079		Government	1937	554.320	Incl. in 2.078	Incl. in 2.078
2.080	Local Government Public Ways	Government	1895	307.200	Not Available	Not Available
2.081	Interstate Bridges of Other States or Subdivisions	Government	2014	381.824	0	0
2.082	Property Used Exclusively for Tribal Government Services	Government	2012	307.181(3)	Not Available	Not Available
2.083	Federally Leased High-Voltage Electricity Transmission Property	Government	2013	307.040(3)	2,000	2,100
2.084	Solar Improvement on Tribal Land	Government	2024	307.181(2)(c)	0	6,100
2.085	Charitable, Literary, and Scientific Organizations	Social Policy	1854	307.130	281,000	306,000
2.086	Fraternal Organizations	Social Policy	1961	307.136	18,500	22,000
2.087	Religious Organizations	Social Policy	1854	307.140	152,000	165,000
2.088	Cemeteries, Burial Grounds, and Mausoleums	Social Policy	1854	307.150	6,700	6,900
2.089	City Owned Sports Facility	Social Policy	2001	307.171	3,500	3,800

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
2.090	Exempt Lease from Taxable Owner	Social Policy	1977	307.112	Incl. in others	Incl. in others
2.091	Exempt Lease from Exempt Owner	Social Policy	1973	307.166	Incl. in others	Incl. in others
2.092	Property of LLC Owned by Nonprofit Corporation	Social Policy	2005	307.022	Incl. in others	Incl. in others
2.093	Federal Property	Federal Law	1854	307.040	1,120,000	1,170,000
2.094	Amtrak Passenger Railroad	Federal Law	1983	308.515(3)(d)	4,100	4,200
<i>Partial Exemptions</i>						
2.095	Fraternities, Sororities, and Cooperatives	Education	1973	307.471	200	200
2.096	New Rural Health Care Facilities	Human Services	2001	307.804(2)	Less than 100	Less than 100
2.097	Long Term Care Facilities	Human Services	1999	307.811	200	200
2.098	Facilities with Prepayment Agreement	Economic/Community	1975	311.865	Less than 100	Less than 100
2.099	Certain Communication Related Property	Economic/Community	2001	308.671	63,000	67,800
2.100	Strategic Investment Program	Economic/Community	1993	307.123	681,000	654,000
2.101	Cap on Central Assessment for Certain Companies	Economic/Community	2015	308.674	4,000	4,400
2.102	Vertical Housing Development Zone	Economic/Community	2001	307.864	11,800	12,900
2.103	Certain Single-Unit Housing	Economic/Community	1989	307.664	3,900	4,200
2.104	Rehabilitated Housing	Economic/Community	1975	308.459	Less than 100	Less than 100
2.105	Multi-Unit Rental Housing in Designated Areas	Economic/Community	1975	307.612	21,100	24,600
2.106	Low Income Multi-Unit Rental Housing	Economic/Community	1999	307.612	Incl. in 2.105	Incl. in 2.105
2.107	Property for Low-Income Rental	Economic/Community	1989	307.517, 307.518	4,500	5,100
2.108	Nonprofit Low-Income Rental Housing	Economic/Community	1985	307.541	39,000	45,400
2.109	New or Rehabilitated Multi-Unit Rental Housing	Economic/Community	2017	Ore. Laws 2017 c.624	Less than 100	Less than 100
2.110	Home Share Program Low-Income Housing	Economic/Community	2019	Ore. Laws 2019 c.566	Less than 100	Less than 100
2.111	Disabled Veterans or Surviving Spouses of Veterans	Economic/Community	1921	307.250	32,300	35,000
2.112	Veterans in Nonprofit Elderly Housing	Economic/Community	1969	307.370	300	300

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
2.113	Workforce Housing	Economic/Community	2021	Ore. Laws 2021 c.527	Less than 100	Less than 100
2.114	Affordable Housing Covenant	Economic/Community	2021	307.555	200	300
2.115	Affordable Housing Projects Receiving Grant	Economic/Community	2024	Ore. Laws 2024 c.110	Not Yet Available	Not Yet Available
2.116	Alternative Energy Systems	Natural Resources	1975	307.175	13,500	14,700
2.117	Pollution Control Facilities	Natural Resources	1967	307.405	Less than 100	Less than 100
2.118	Watercraft Centrally Assessed	Natural Resources	1925	308.515(3)(a-c)	Not Available	Not Available
2.119	Aircraft Under 75,000 Pounds Owned by Air Transportation Companies	Transportation	1987	308.565(5)	200	200
2.120	Homestead Exemption for Active Duty Military	Social Policy	2005	307.286	100	100
2.121	Surviving Spouse of Public Safety Officer	Social Policy	2016	307.295	Less than 100	Less than 100
2.122	Seismic Upgrades	Social Policy	2017	Ore. Laws 2017 c.537	Less than 100	Less than 100
2.123	Railroad Right of Way in Water District	Social Policy	1943	264.110	Less than 100	Less than 100
2.124	Railroad Right of Way in Highway Lighting District	Social Policy	1947	372.190	Less than 100	Less than 100
2.125	Railroad Right of Way in Rural Fire District	Social Policy	1969	478.010(2)(d)	3,800	4,100
<i>Special Assessments</i>						
2.126	Use-Restricted Multi-Unit Rental Housing	Economic/Community	2001	308.704	4,500	5,000
2.127	Nonprofit Housing for the Elderly	Economic/Community	1969	308.490	Less than 100	Less than 100
2.128	Homes Rebuilt After 2020 Wildfires	Economic/Community	2024	Ore. Laws 2024 c.94	Not Available	Not Available
2.129	Farmland	Natural Resources	1967	308A.062, 308A.068, 308A.128	411,000	448,000
2.130	Farm Homesites	Natural Resources	1987	308A.253	26,300	29,300
2.131	Historic Property	Natural Resources	1975	358.505	3,300	2,400
2.132	Wildlife Habitat	Natural Resources	2003	308A.415	2,000	2,100
2.133	Conservation Easements	Natural Resources	2007	308A.456	700	700
2.134	Open Space Land	Natural Resources	1971	308A.315	1,100	1,200
2.135	Forest Homesites	Natural Resources	1989	308A.253	9,000	9,700
2.136	Western Private Forestland	Natural Resources	1977	321.354	134,000	144,000

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
2.137	Eastern Private Forestland	Natural Resources	1971	321.833	14,700	15,900
2.138	Small Tract Forestland Option	Natural Resources	2003	321.722	29,900	36,700
2.139	Watercraft Locally Assessed	Natural Resources	1925	308.256	5,300	5,300
<i>Other</i>						
2.140	Destroyed or Damaged Property	Social Policy	1971	308.146, 308.425	400	400
Gas, Use, and Jet Fuel Taxes						
3.001	Forest Products: Gasoline	Natural Resources	1945	319.320(1)(b), (d)	0	0
3.002	Forest Products: Other than Gasoline	Natural Resources	1965	319.831(1)(c), (g)	0	0
3.003	Vehicle Used for Testing Emissions (Gas and Use Fuel Taxes)	Transportation	2015	825.475	0	0
3.004	Fuel for Aircraft Departing U.S.	Transportation	1953	319.330(2)	Less than 100	Less than 100
3.005	Public Services	Government	1961	319.831(1)(d-f), (h-k)	2,100	2,100
3.006	Public Transportation	Government	1974	267.570(2)	1,000	1,000
Weight-Mile Tax						
4.001	Farming Operations	Natural Resources	1983	825.017(4), 825.024	13,400	13,600
4.002	Forest Products on County Roads	Natural Resources	1977	825.017(8)	Less than 100	Less than 100
4.003	Vehicle Used for Testing Emissions (Weight-Mile Tax)	Transportation	2015	825.475	700	200
4.004	Elementary and Secondary School Vehicles	Government	Pre-1953	825.017(1)	2,900	3,000
4.005	Fire Protection	Government	1977	825.017(16)	Less than 100	Less than 100
4.006	Government Owned or Operated Vehicles	Government	1947	825.017(10)	800	800
4.007	Public Mass Transit Vehicles	Government	1977	825.017(11)	8,100	8,300
4.008	Charitable Organizations	Social Policy	1977	825.017(13)	200	200

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
Cigarette Tax						
5.001	Small Quantity by Consumers	Tax Administration	1965	323.060	400	400
5.002	Federal and Veterans Institutions (Cigarette)	Federal Law	1965	323.055	500	500
Other Tobacco Products Tax						
6.001	Federal and Veterans Institutions (Other Tobacco Products)	Federal Law	1985	323.515	Less than 100	Less than 100
Beer and Wine Taxes						
7.001	Small Wineries	Economic/Community	1977	473.050(5)	3,700	4,000
7.002	Wine Marketing Activities	Economic/Community	2001	473.047	Less than 100	Less than 100
7.003	Oregon Grapes for Wine Without Oregon Designation or AVA	Natural Resources	2019	473.046	Less than 100	Less than 100
Emergency and Crisis Services Taxes						
8.001	State and Local Subscribers	Government	1981	403.205(1)	11,500	11,600
8.002	Oregon Telephone Assistance Program	Government	2023	403.205(2)	100	100
8.003	Federal Subscribers	Federal Law	1981	403.205(1)	1,100	1,200
8.004	Indian Reservation Subscribers	Federal Law	1981	403.205(1)	1,000	1,100
Corporate Activity Tax						
9.001	Sales of Prescription Drugs by Eligible Pharmacies	Human Services	2022	317A.123	9,000	4,600
9.002	Subcontractor Labor Payments for Residential Construction	Economic/Community	2019	317A.122	1,700	900
9.003	Precious Metals	Economic/Community	2023	317A.100(1)(b)(WW)	100	200
9.004	Insurers Subject to Retaliatory Tax	Consumer and Business Services	2021	317A.100(4)(h)	Not Available	Not Available

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
Electric Cooperative Tax						
10.001	Revenue from Government Leased Lines	Natural Resources	1969	308.805, 308.807(1)	200	200
Oil and Gas Privilege Tax						
11.001	State and Local Interests	Government	1981	324.090(1)	Not Available	Not Available
11.002	Credit for Property Taxes Paid	Natural Resources	1981	324.090(2)	Not Available	Not Available
Medical Provider Taxes						
12.001	Excluded Hospitals	Human Services	2003	414.853(3)(b)	a	a
12.002	Oregon Veterans' Home	Human Services	2003	409.803	a	a
12.003	Type A and B Hospitals	Human Services	2017	414.855(3)(c)	a	a
Lodging Tax						
13.001	Exempt Dwelling Units	Social Policy	2005	320.308	Not Available	Not Available
13.002	Lodging Paid for by the Federal Government	Federal Law	2003	U.S. Constitution, Article VI, Clause 2	800	800
Local Construction Tax						
14.001	Exempt Construction	Social Policy	2007	320.173	Not Available	Not Available
Estate Transfer Tax						
15.001	Conservation Easement	Natural Resources	2011	118.010(3)	Less than 100	Less than 100
15.002	Marital Deduction	Economic/Community	2011	118.010(3), (8)	399,000	399,000
15.003	Natural Resource and Fishing Property (Deduction)	Natural Resources	2023	118.145	23,400	31,300
15.004	Charitable Bequests	Social Policy	2011	118.010(3)	109,000	109,000
15.005	Natural Resource and Fishing Property (Credit)	Natural Resources	2007	118.140	Less than 100	Less than 100
15.006	Small Forest Owner Forest Conservation (Estate Transfer Tax)	Natural Resources	2022	315.124	Not Available	Not Available
15.007	Special Valuation	Economic/Community	2011	118.010(3)	Not Available	Not Available

INDEX OF TAX EXPENDITURES BY TAX PROGRAM

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
Marijuana Tax						
16.001	Marijuana Purchased for Medical Use	Human Services	2016	475C.678	18,900	19,200
Vehicle Use Tax						
17.001	Certain Vehicle Modifications (Vehicle Use Tax)	Economic/Community	2018	320.400(2)(b)	Not Available	Not Available
17.002	Vehicles Purchased by the Federal Government or Tribes	Federal Law	2017	U.S. Constitution, Article VI, Clause 2	200	200
Vehicle Privilege Tax						
18.001	Certain Vehicle Modifications (Vehicle Privilege Tax)	Economic/Community	2018	320.400(2)(b)	Not Available	Not Available
18.002	Vehicles Sold at Auction	Economic/Community	2017	320.425(2)	100	100
18.003	Vehicles Sold for Out of State Use	Economic/Community	2017	320.425(1)	12,700	14,300

a. No revenue loss, tax expenditure results in a shift in tax liability from exempt to nonexempt taxpayers.

CHAPTER 1. PERSONAL & CORPORATE INCOME TAXES

This chapter describes tax expenditures in Oregon’s personal and corporation income tax programs. The chapter is divided into sections based on the legal source and form of the tax expenditures. A more complete discussion of how Oregon tax expenditures are identified is available at www.oregon.gov/DOR/Stats. The following is a brief summary of how tax expenditures are identified for the income tax programs.

Oregon law defines a tax expenditure as a reduction in tax resulting from a deviation from the “established tax.” For tax expenditures resulting from Oregon’s connection to the federal definition of taxable income, we adopt the definition of the tax expenditures used by the U.S. Congressional Research Service (CRS) and the federal Joint Committee on Taxation (JCT). Under that definition, the tax base is income from all sources, including both monetary and nonmonetary income, less any expenses incurred in earning investment and business income. Monetary income includes wages, salaries, interest, dividends, public assistance payments, and all other monetary income. Examples of nonmonetary income include the value of health benefits provided by employers, the value of gifts received by the individual, and discounts that employees may receive when they buy products from their employer. For business income, the expenses necessary to produce the income are not considered income, so deductions that result from economic expenses like wages and rents are not considered tax expenditures.

For tax expenditures that are specific to Oregon, we report provisions that create specific reductions in taxable income, differential tax rates, tax credits, and other provisions that reduce tax and are explicit in Oregon law.

The starting point for calculating Oregon’s personal and corporate income taxes is income taxable at the federal level, and this connection to the federal tax code has important implications for Oregon’s tax. Using the same definition of income helps simplify the Oregon tax return, reducing the number of calculations taxpayers need to make. The connection to the federal definition of taxable income also makes the tax easier for the state of Oregon to administer.

In 2017, significant changes were made to the federal income tax system by the law generally known as the Tax Cuts and Jobs Act of 2017 (TCJA). For individuals, TCJA temporarily increased the standard deduction, eliminated the personal exemption, lowered tax rates, and made changes to itemized deductions. Most of those changes do not directly affect Oregon’s definition of taxable income, but a federal cap of \$10,000 in deductible state and local income taxes impacts Oregon tax paid by taxpayers who itemize Oregon deductions and have property taxes in excess of \$10,000. Most of these temporary federal provisions from TCJA will expire after tax year 2025. For corporations, TCJA made several permanent changes, including a reduction in the tax rate and significant changes in the way international corporations’ income is taxed. Oregon is not connected to federal tax rates, but does have a connection to many federal provisions, including changes in treatment of depreciation and expensing, as well as the changes in international taxation.

Oregon has some deviations from federal taxable income. Income taxed federally but not by Oregon is subtracted from federal taxable income when computing Oregon tax (called subtractions). There are also additions to federal taxable income: income Oregon taxes that is not taxed federally. After those calculations are complete, Oregon also has tax expenditures expressed as tax credits or preferential tax rates.

Personal Income Tax

The personal income tax, sometimes called the individual income tax, is the state of Oregon’s largest source of revenue. For the 2023–25 biennium, this revenue is estimated to be \$21.9 billion, or 81 percent of General Fund revenues, and \$29.3 billion for 2025–27. The Department of Revenue publishes an annual report that provides detailed information and statistics on the personal income tax. The most recent edition of *Oregon Personal Income Tax Statistics* is at www.oregon.gov/DOR/Stats.

Corporation Excise and Income Taxes

Oregon’s corporation excise and income taxes are the taxes on corporate profits where net income is the measure of profitability. Virtually all corporate tax filers pay the excise tax, and very few pay the income tax. Because the taxes are nearly identical and the tax base is net income, we refer here to both taxes as the corporation income tax.

The corporation income tax is the second largest source of revenue for the state General Fund. For the 2023–25 biennium, this revenue is estimated to be \$3.11 billion, or 11 percent of General Fund revenues, and \$3.12 billion for 2025–27. The Department of Revenue publishes an annual report that provides detailed information and statistics on

the corporation income tax. The most recent version of *Oregon Corporate Excise and Income Tax* is at www.oregon.gov/DOR/Stats.

Changes to Tax on Corporations' International Earnings

The Tax Cuts and Jobs Act of 2017 made significant changes to how taxes are applied to corporations. In Oregon, a tax expenditure is a provision that exempts income from “the impact of established taxes,” the established tax base of corporations with international operations is taken to be income earned within the U.S. Four major features of the federal system for taxing corporations with international operations are particularly relevant to state-reported tax expenditures.

- **Participation Exemption:** Corporations are taxed on their profits within the U.S. and not taxed on the profits of their foreign subsidiaries. This is accomplished by allowing a 100 percent deduction for dividends paid by foreign corporations to U.S. based corporations with at least 10 percent ownership in the payer. The exemption of foreign profits from domestic tax is considered the established tax base for a territorial tax system and is not reported as an Oregon tax expenditure.
- **Global Intangible Low Taxed Income (GILTI):** Corporations are required to add earnings in foreign countries that exceed 10 percent of their investment to the otherwise territorial base as taxable income. They are then allowed a deduction and a limited credit for foreign taxes paid on that income. Because those earnings would not be included in a purely territorial tax base, this acts as a minimum tax on foreign profits. The deduction that corresponds to the additional income included by GILTI is not reported as a tax expenditure in Oregon.
- **Foreign Derived Intangible Income (FDII):** Corporations with earnings in the U.S. that are attributable to exports can deduct a portion of those earnings that exceed 10 percent of their investment. This income is part of a territorial tax base, and therefore, the deduction is intended to selectively benefit exporters. This benefit is reported as an Oregon tax expenditure because it provides favorable treatment of some income that would otherwise be included in the territorial tax base.
- **Base Erosion and Anti-Abuse Tax (BEAT):** This federal provision acts as a minimum tax to very large corporations making significant payments to foreign affiliates. Oregon is not connected to the BEAT, therefore it has no impact on Oregon tax expenditure reporting.

TAX EXPENDITURES IN FEDERAL TAXABLE INCOME

Like many states, Oregon’s income tax calculations begin with the definition of taxable income in federal law, with some specific exceptions. Tying to the federal definition of taxable income implicitly adopts many of the tax expenditures that exist in the federal tax code. Special provisions allowed by the federal government that reduce taxable income will flow through to Oregon’s tax and result in lower Oregon tax collections.

The listing of federal tax expenditures is based on the December 2023 estimates prepared by the federal Joint Committee on Taxation¹. That publication is our primary source of information used to estimate the Oregon revenue reduction associated with federal tax expenditures. An additional source of information is the Fiscal Year 2025 Analytical Perspectives publication prepared by the White House’s Office of Management and Budget².

For several of the tax expenditures, revenue impacts were estimated from Oregon personal income tax return information. Beginning with tax year 2018, a new schedule was created to complement the Oregon personal income tax return, where taxpayers who itemize deductions for Oregon are required to list their itemized deductions. This allowed for a more direct measure of the revenue impact for several of the tax expenditures related to itemized deductions.

The tax expenditures in this report differ from those reported by JCT in the following ways:

- Oregon does not have an automatic connection to federal tax credits, federal rates, or taxable income for insurance companies, so related federal tax expenditures are not presented;
- deviations from a “normal tax structure” that generally result in higher taxes are not listed in this report (JCT refers to these as negative tax expenditures);
- earnings of businesses outside the U.S. are no longer part of Oregon’s established tax base after the changes made by the Tax Cuts and Jobs Act of 2017;
- some related provisions were combined, though an attempt was made to specify which ones have been combined in the descriptions of the tax expenditures; and
- employment-related moving expenses is listed as a tax expenditure.

For federal tax expenditures that reduce Oregon receipts and have an associated revenue impact estimated by JCT, this report provides full descriptions. The descriptions rely heavily on the Congressional Research Service Compendium of Tax Expenditures³, which is a good resource to peruse for more detailed descriptions and analysis.

In addition, for these tax expenditures included in this report, if the federal counterpart is listed in the Congressional Research Service Compendium of Tax Expenditures, a specific citation is given under the Evaluation, which points to the federal assessment of that federal tax expenditure.

Tax expenditures resulting from the connection to federal taxable income are categorized into exclusions, adjustments (above-the-line deductions), and deductions.

The first part of the income tax chapter of this report provides estimates and descriptions for 84 federal provisions (exclusions, deductions, and adjustments). Of those, 53 flow through to Oregon’s personal income tax, 5 flow through to corporations, and 26 flow through to both the personal and corporation income taxes.

We generally do not provide full descriptions of federal tax expenditures that are listed by JCT as *de minimis*, or not quantifiable. Nor do we give full descriptions of provisions that Oregon specifically does not connect to. These provisions are listed in [Other Federal Provisions \(Unquantified or Disconnected\)](#) on page 93.

1. Joint Committee on Taxation, *Estimates of Federal Tax Expenditures for Fiscal Years 2023-2027* (JCX-59-23), December 7, 2023. <https://www.ict.gov/publications/2023/jcx-59-23/>
2. Office of Management and Budget, *Analytical Perspectives Budget of the U.S. Government Fiscal year 2025*. https://www.whitehouse.gov/wp-content/uploads/2024/03/spec_fy2025.pdf
3. Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*, Senate Committee Print 117-24, December 2022, U.S. Government Printing Office. <https://www.congress.gov/117/cprt/SPRT49569/CPRT-117SPRT49569.pdf>

1.001 SCHOLARSHIP AND FELLOWSHIP INCOME

Internal Revenue Code Section: 117

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1954

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$34,000,000	\$34,000,000
2025-27	Not Applicable	\$38,000,000	\$38,000,000

DESCRIPTION

Scholarships and fellowships are excluded from personal taxable income to the extent that they cover tuition and course related expenses (e.g. books, supplies, fees and equipment) of individuals who are candidates for undergraduate or graduate degrees at colleges, universities, or other educational institutions.

This provision is extended by the subtraction described in [1.302, Scholarship Awards Used for Housing Expenses](#).

PURPOSE

This provision "...initially justified the exclusion of scholarship and fellowship income on the grounds that the awards were analogous to gifts. With the development and proliferation of grant programs based on financial need, justification now rests on the hardship that taxation would impose." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Individuals receiving scholarship or fellowship income or reduced tuition. Students attending schools with higher tuition costs will generally benefit more because tuition and course-related fees are greater.

EVALUATION

See Exclusion of Scholarship and Fellowship Income, Assessment, p. 723 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.002 QUALIFIED EDUCATION SAVINGS (FEDERAL)

Internal Revenue Code Section: 529 and 530

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1996

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$41,000,000	\$41,000,000
2025-27	Not Applicable	\$43,000,000	\$43,000,000

DESCRIPTION

Individuals may establish tax-deferred and tax-exempt college savings plans through state-sponsored savings plans, trust or custodial accounts, or prepaid tuition accounts through qualifying educational institutions. These accounts are set up for the purpose of paying education-related expenses or tuition on behalf of a designated beneficiary. The SECURE 2.0 Act of 2022 allowed tax-free distributions in 2024 onwards for 529 qualified tuition programs to Roth IRAs, subject to some limitations.

Qualifying distributions from savings or prepaid tuition plans are excluded from taxable income. Nonqualifying distributions are subject to a federal penalty, and the earnings of the nonqualifying distribution are subject to income taxation.

Under federal law, contributions to these accounts are not tax deductible, but the earnings on the account balances are excluded from income. The revenue impact for this expenditure is based on earnings on the accounts.

The estimated revenue loss for this tax expenditure includes the following components listed separately by the U.S. Joint Committee on Taxation:

- Prepaid Tuition Programs.
- Savings Account Programs.
- Exclusion of earnings of trust accounts for higher education (“Coverdell ESAs”).

Oregon also has a tax benefit for taxpayers who contribute to an Oregon 529 College Savings Network account in the form of a refundable tax credit. See [1.405, Contributions to 529 Account](#).

PURPOSE

“...529 plans were intended to encourage families to save for college...” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2020). Presumably, the purpose of the exclusion is to further encourage families to contribute to 529 plans as a way to save for college.

WHO BENEFITS

Students and families of students are able to defer and eventually avoid tax on earnings of these accounts and therefore may accumulate savings more quickly for future higher education expenses. Tax benefits are more likely to accrue to higher income families reflecting higher tax rates and means to save for college.

EVALUATION

See Assessments for tax expenditures related to Education Savings, p. 701 and 707 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.003 EXCLUSION OF EMPLOYER-PROVIDED TUITION REDUCTION

Internal Revenue Code Section: 117(d)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1984

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$2,000,000	\$2,000,000
2025-27	Not Applicable	\$2,500,000	\$2,500,000

DESCRIPTION

Tuition reductions for employees of educational institutions may be excluded from federal income taxes provided they do not represent payment for services. The exclusion also applies to tuition reductions for an employee’s spouse and dependent children. Tuition reductions can occur at schools other than where the employee works, provided they are granted by the school attended, and not paid by the employing school. Tuition reductions cannot discriminate in favor of highly compensated employees.

PURPOSE

“Educational institutions provide tuition reductions to employees as a fringe benefit, which may reduce costs of labor and job turnover.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022).

WHO BENEFITS

Employees of education institutions who receive untaxed tuition reductions.

EVALUATION

See Exclusion of Employer-Provided Tuition Reduction Benefits, *Assessment*, p. 719 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.004 CERTAIN FOSTER CARE PAYMENTS

Internal Revenue Code Section: 131

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1982

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$4,000,000	\$4,000,000
2025-27	Not Applicable	\$4,000,000	\$4,000,000

DESCRIPTION

Payments made by a state, local, or qualified foster care placement agency to a foster care provider for caring for a qualified foster individual in the provider's home are excluded from personal taxable income of the foster care provider. Payments received in excess of actual expenses incurred represent the monies that would be taxable were it not for the exclusion. A qualified foster individual is an individual placed by a qualified foster care placement agency, regardless of age at the time of placement.

PURPOSE

"... payments made by charitable child-placing agencies or governments (such as child welfare agencies) were not taxable when the payments were reimbursements or advances for expenses incurred on behalf of the agencies or governments by the foster parents." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Foster care providers for qualified individuals.

EVALUATION

See Exclusion of Certain Foster Care Payments, *Assessment*, p. 874 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.005 EMPLOYEE ADOPTION BENEFITS

Internal Revenue Code Section: 137

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1996

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$500,000	Less than \$500,000
2025-27	Not Applicable	Less than \$500,000	Less than \$500,000

DESCRIPTION

Benefits that employees who adopt children receive under employer-sponsored adoption assistance programs are excluded from personal taxable income. The maximum exclusion in 2023 was \$15,950 per child, including special needs children. Expenses may be incurred over several years. Employees who receive employer-provided adoption assistance must do so under an established employer-sponsored adoption assistance program (see IRS publication 15-B for description of employee program parameters). In 2023, the exclusion was phased out for modified adjusted gross

incomes between \$239,230 and \$279,230, at which point no exclusion was allowed. The exclusion limit and the beginning of the income phase-out range are permanently indexed to inflation. The \$40,000 range over which the exclusion is phased-out is not indexed to inflation.

PURPOSE

“According to the Joint Committee on Taxation, Congress enacted the ... exclusion because of the belief that the financial costs associated with the adoption process should not be a barrier to adoption.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Adoptive parents who receive benefits from employer-sponsored adoption assistance programs.

EVALUATION

See Adoption Credit and Employee Adoption Benefits Exclusion, *Assessment*, p. 868 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.006 COMPENSATORY DAMAGES

Internal Revenue Code Section: 104(a)(2)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1918

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$16,000,000	\$16,000,000
2025-27	Not Applicable	\$15,000,000	\$15,000,000

DESCRIPTION

Payments that a person receives as compensatory damages for physical injury or physical sickness, whether paid in a lump sum or in periodic payments, are excluded from taxable income.

PURPOSE

“It [the exclusion] is based on the reasoning that these payments are compensating for a loss.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*), Presumably, the purpose of the exclusion is to avoid reducing of the value of these payments.

WHO BENEFITS

People who have been injured and received compensatory damages.

EVALUATION

See Exclusion of Damages on Account of Personal Physical Injuries or Physical Sickness, *Assessment*, p. 1012 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.007 EMPLOYER PAID MEDICAL AND CAFETERIA PLAN BENEFITS

Internal Revenue Code Section: 105, 106 and 125

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1918 and 1978 (Cafeteria plan benefits)

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,800,000,000	\$1,800,000,000
2025-27	Not Applicable	\$1,800,000,000	\$1,800,000,000

DESCRIPTION

Employer payments for health insurance, other employee medical expenses, and long-term care insurance are not included in the employee's personal taxable income. Federal law does require that the imputed value of health and other fringe benefits of a domestic partner be included in adjusted gross income when cohabitating couples are not married.

Also included in this tax expenditure are employer-paid benefits under cafeteria plans, which offer employees a choice between taking monetary compensation or qualified benefits such as health insurance, dependent care assistance, and adoption assistance. The employee pays no tax when choosing the benefits but does pay tax when choosing the cash. This provision was enacted in federal law in 1978.

PURPOSE

"The exclusion for employer-provided health benefits is thought to exert a strong influence on the health insurance coverage for a substantial share of the nonelderly working population. Because of the subsidy, employers face a significant incentive to offer employee compensation in the form of health benefits rather than taxable wages salaries. (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022).

WHO BENEFITS

Employees, their spouses, and dependents receiving employer-paid health benefits and employees receiving employer-paid cafeteria plan benefits.

EVALUATION

See Exclusion of Employer Contributions for Health Care, Health Insurance Premiums, and Long-Term Care Insurance Premiums, *Assessment*, p. 968 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.008 PENSION CONTRIBUTIONS AND EARNINGS

Internal Revenue Code Section: 401–407, 410–418E, and 457

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1921

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$3,100,000,000	\$3,100,000,000
2025-27	Not Applicable	\$3,900,000,000	\$3,900,000,000

DESCRIPTION

In general, all compensation (wages and benefits) of an employee is taxable income for the employee. This provision exempts employer contributions to pension plans from inclusion in the employee's personal taxable income in the year

of contribution. In addition, self-employed individuals are allowed to reduce taxable income for qualified contributions to qualified retirement accounts. Earnings on balances in those accounts are also not taxed.

Tax on contributions and earnings is deferred until distribution when withdrawals are included in taxable income. The estimated revenue impact is a net figure; the revenue foregone in a given year is offset by the amount of tax paid on withdrawals in that year. The bulk of the revenue impact in most years is from the exclusion on earnings.

This tax expenditure includes the following components listed separately by the federal Joint Committee on Taxation:

- Defined Benefit Plans.
- Defined Contribution Plans.
- Plans covering partners and sole proprietors (sometimes referred to as “Keogh Plans”).

More than 90 percent of the estimated revenue loss of this provision is attributable to employer (defined benefit and contribution) plans.

PURPOSE

“The major economic justification for the favorable tax treatment of pension plans is that they arguably increase savings and increase retirement income security.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Employees and self-employed individuals with qualified retirement savings or pension benefits.

EVALUATION

See Assessments for tax expenditures related to pension contributions and earnings, p. 1041, 1049, and 1059 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.009 SOCIAL SECURITY BENEFITS (FEDERAL)

Internal Revenue Code Section: 86 (and multiple revenue rulings)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1938

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$898,000,000	\$898,000,000
2025-27	Not Applicable	\$972,000,000	\$972,000,000

DESCRIPTION

A portion of Social Security and Railroad Retirement Board benefits are considered nontaxable at the federal level. Oregon extends the tax exemption to the full amount of benefits. As a result, there are two tax expenditures pertaining to these benefits. This tax expenditure pertains to those benefits that are exempt at the federal level. The tax expenditure pertaining to the portion of benefits that are taxed at the federal level but are exempt in Oregon is [1.307, Social Security Benefits \(Oregon\)](#).

The portion of benefits subject to federal taxation depends on the amount of “provisional income” above certain thresholds. Provisional income is adjusted gross income plus one-half of Social Security benefits and otherwise tax-exempt interest income (i.e., interest from tax-exempt bonds) as well as certain income specifically excluded from federal income taxation. Taxpayers with provisional income under \$25,000 (single) or \$32,000 (married filing jointly) pay no federal tax.

If provisional income is above these thresholds but below \$34,000 (single) or \$44,000 (joint) then the amount of benefits subject to tax is the lesser of: (1) 50 percent of benefits, or (2) 50 percent of provisional income above the first threshold. If income is above the second threshold, the amount of benefits subject to tax is the lesser of: (1) 85 percent

of benefits, or (2) 85 percent of income above the second threshold, plus the smaller of \$4,500 (single) or \$6,000 (joint), or 50 percent of benefits. For couples filing separately, taxable benefits are the lesser of 85 percent of benefits or 85 percent of provisional income.

PURPOSE

The Congressional Research Service cited three reasons for the original exclusion: (1) Congress did not intend for these benefits to be taxed, (2) the benefits were intended to be in the form of government transfers, and (3) taxing these benefits would defeat their intended purposes.

WHO BENEFITS

Oregon taxpayers who receive federally taxable Social Security or Railroad Retirement Board benefits. For 2022, about 430,500 full-year Oregon filers used this exclusion or the related Oregon subtraction.

For more detail, see the distributional table presented with the Oregon subtraction, [1.307, Social Security Benefits \(Oregon\)](#).

EVALUATION

See Exclusion of Untaxed Social Security and Railroad Retirement Benefits, *Assessment*, p. 1108 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.010 REGIONAL ECONOMIC DEVELOPMENT INCENTIVES

Internal Revenue Code Section: 38(b), 39(d), 280C(a), and 1391–1397D

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: 12-31-2025

Year Enacted: 1993

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$500,000	Less than \$500,000	Less than \$500,000
2025-27	Less than \$500,000	Less than \$500,000	Less than \$500,000

DESCRIPTION

Federal law allowed for the designation of up to 40 empowerment zones, 95 enterprise communities, and 40 renewal communities in the United States to receive special tax benefits. These tax benefits include a wage tax credit (Oregon is not connected to the federal tax credit), the nonrecognition of gains on rollovers of empowerment zone investments, and expanded tax-exempt financing for certain empowerment zone facilities.

Designated areas must satisfy eligibility criteria including poverty rates, population, and geographic size limits. These provisions were enacted as temporary but have been extended several times. After the most recent extension (in the Consolidated Appropriations Act of 2021), designated areas are eligible for benefits through December 31, 2025.

Oregon currently has no areas that qualify for this tax expenditure. The 10-year designation of two Oregon federal Enterprise Communities in Josephine County and Portland ended on December 31, 2004. As of the publication date of this report, there has been no Oregon area designated as a federal Empowerment Zone or Renewal Community.

Oregon taxpayers may have lower taxable income due to investments in these zones despite their location outside Oregon.

PURPOSE

“The geographically targeted tax provisions [of this tax expenditure] may encourage increased employment and income of individuals living and working in the zones and increased incentives to businesses operating in the zones.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022).

WHO BENEFITS

Both businesses and employees within the designated areas may benefit.

EVALUATION

See Empowerment Zone Tax Incentives, *Assessment*, p. 627 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.011 CAPITAL GAIN INVESTED IN OPPORTUNITY ZONE

Internal Revenue Code Section: 1400Z-1 and 1400Z-2

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: 12-31-2026

Year Enacted: 2017

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$3,000,000	\$20,000,000	\$23,000,000
2025-27	Less than \$500,000	\$2,500,000	\$2,500,000

DESCRIPTION

Capital gains invested in or derived from investments in designated Opportunity Zones are eligible for deferral or exclusion from income.

Three tax incentives are associated with qualified Opportunity Zones:

- Federal income tax on capital gains may be temporarily deferred if the gains are reinvested in a qualified opportunity fund (QOF) within 180 days after the sale or disposition of the related asset.
- If the investment in the QOF is held for at least five years, 10 percent of the gain may be excluded from taxable income. If the asset or investment is held for at least seven years, 15 percent of the gain may be excluded from taxable income.
- QOF investments held for at least 10 years and until at least December 31, 2026, are to be eligible for permanent exclusion of capital gains tax on any gains from the qualified portion of their investment earned within the Opportunity Zone when the QOF investment is sold or disposed.

A qualified opportunity fund is a corporation or partnership that invests at least 90 percent of its assets in property in a designated qualified opportunity zone.

Designated Opportunity Zones are certain low-income census tracts designated by state governors and approved by the U.S. Treasury. In May of 2018, all 86 of Oregon's nominated Opportunity Zones were approved.

Oregon taxpayers may have lower taxable income due to investments in these zones whether their location is inside or outside Oregon.

Opportunity Zone tax incentives are in effect from December 22, 2017 through December 31, 2026. There is no gain or deferral available with respect to any sale or exchange made after December 31, 2026, and there is no exclusion available for investments in qualified Opportunity Zones made after December 31, 2026.

PURPOSE

"Opportunity Zones are an economic development tool – that is, they are designed to spur economic development and job creation in distressed communities" (Internal Revenue Service Opportunity Zones Frequently Asked Questions, accessed July 2018)

WHO BENEFITS

Taxpayers who invest in qualified opportunity funds.

EVALUATION

See Qualified Opportunity Zones, *Assessment*, p. 647 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.012 EXCLUSION OF GAIN FROM CERTAIN SMALL BUSINESS STOCK

Internal Revenue Code Section: 1202 and 1045

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1993

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$78,000,000	\$78,000,000
2025-27	Not Applicable	\$77,000,000	\$77,000,000

DESCRIPTION

Individual and non-corporate business taxpayers (including pass-through entities like partnerships and S corporations) are allowed to exclude from gross income 50 percent or more of gain from the sale or exchange of qualified small business stock (QSBS).

The exclusion is 100 percent for stock acquired after September 27, 2010 if it meets all of the following:

- The stock must be acquired by a noncorporate taxpayer at the time of issue in exchange for money, property, or services; and then held for at least five years.
- The stock must be issued by a C corporation with no more than \$50 million in gross assets, and at least 80 percent of its assets must be employed during the five-year holding period.
- The corporation must be a “specialized small business investment company” (SSBIC) or in any line of business excluding the following: healthcare, law, engineering, architecture, food service, lodging, farming, insurance, finance, and mining.

The exclusion is limited to the greater of \$10 million or ten times the taxpayer’s basis in the stock. The former limit is not adjusted for inflation.

PURPOSE

“The QSBS gains exclusion seems largely intended to increase the flow of equity capital to new or young small firms and SSBICs in a range of industries. These firms may have difficulty raising capital from more traditional sources such as banks, angel investors, or private equity firms.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Individuals who invest in qualified small business stock at the initial offering and later realize gains on that investment. According to the Congressional Research Service, most of the benefits are captured by small business owners and high-income individuals.

EVALUATION

See Exclusion of Gain from Certain Small Business Stock, *Assessment*, p. 575 in [Tax Expenditures: Compendium of Background Material on Individual Provisions, 2022](#).

1.013 IMPUTED INTEREST RULES

Internal Revenue Code Section: 163(e), 483, 1274 and 1274A

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1984

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$500,000	\$7,500,000	\$7,500,000
2025-27	Less than \$500,000	\$8,000,000	\$8,000,000

DESCRIPTION

For debt instruments that pay less than the market rate of interest, a higher market rate (imputed interest rate) generally must be used to calculate income and expenses for tax purposes. The imputed interest must be included as income to the recipient and is deducted by the payer.

There are several exceptions to the general imputed interest rule. Debt associated with the sale of property when the total sales price is no more than \$250,000, the sale of farms or small businesses by individuals when the sales price is no more than \$1 million, and the sale of a personal residence are not subject to the imputation rules. The reported impact of this provision is the revenue loss caused by the exceptions.

A common example of this exemption is a low interest, no interest, or “gift” loan involved in the sale of property between family members.

PURPOSE

According to the Congressional Research Service, the purpose of these exemptions is “to allow more flexibility in structuring sales of personal residences, small businesses, and farms by the owners, and to avoid the administrative problems that might arise in applying the rules to other smaller sales.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Sellers of residences, small businesses, and farms who would otherwise pay tax on interest they do not charge and will not receive.

EVALUATION

See Exemptions from Imputed Interest Rules, *Assessment*, p. 505 in [Tax Expenditures: Compendium of Background Material on Individual Provisions, 2022](#).

1.014 EMPLOYER PROVIDED DEPENDENT CARE

Internal Revenue Code Section: 129

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1981

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$7,000,000	\$7,000,000
2025-27	Not Applicable	\$9,000,000	\$9,000,000

DESCRIPTION

Employer payments for dependent care through a dependent care assistance program are not included in the employee’s personal taxable income. The maximum exclusion is \$5,000 and may not exceed the employee’s (or employee’s spouse if married) earned income. To qualify, the employer assistance must be provided under a plan that meets certain conditions, such as eligibility requirements that do not discriminate in favor of certain employees.

PURPOSE

“The provision was intended to recognize the similarity of child care expenses to employee business expenses and provide a limited benefit.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022).

WHO BENEFITS

Employees receiving employer paid dependent care benefits.

EVALUATION

See Credit for Child and Dependent Care and Exclusion of Employer-Provided Child Care, *Assessment*, p. 853 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.015 CAPITAL GAINS ON HOME SALES

Internal Revenue Code Section: 121

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1997

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$450,000,000	\$450,000,000
2025-27	Not Applicable	\$470,000,000	\$470,000,000

DESCRIPTION

Homeowners may exclude from personal taxable income up to \$250,000 (single taxpayers) or \$500,000 (married taxpayers filing joint returns) of capital gain realized on the sale of their principal residence. (These limits are not indexed to inflation.) To qualify, the taxpayer must have owned and occupied the home for at least two of the previous five years. The exclusion applies only to the portion of the property associated with the residence, not portions of the property used in business activity. The exclusion is allowed each time a taxpayer meets the eligibility requirements, but generally not more than once every two years.

PURPOSE

“... many see the exclusion on the sale of a principal residence as justifiable because the tax law does not allow the deduction of personal capital losses, because much of the profit from the sale of a personal residence can represent inflationary gains, and because the purchase of a principal residence is less of a profit-motivated decision than other types of investments. Taxing the gain on the sale of a principal residence might also interfere with labor mobility...” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022).

WHO BENEFITS

Homeowners who sell their principal residences for a gain.

EVALUATION

See Exclusion of Capital Gains on Sales of Principal Residences, *Assessment*, p. 397 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.016 INCOME EARNED ABROAD BY U.S. CITIZENS

Internal Revenue Code Section: 911

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1926

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$50,000,000	\$50,000,000
2025-27	Not Applicable	\$51,000,000	\$51,000,000

DESCRIPTION

U.S. citizens (except U.S. federal employees) who live abroad may exclude from personal taxable income any salary or wages earned from employment overseas. In 2023, the maximum exclusion is up to \$120,000. The income limit of the foreign earned income exclusion is indexed to inflation. A taxpayer must meet foreign residence tests to receive the exclusion. Taxpayers may also exclude the value of employer provided foreign housing expenses if certain conditions are met.

Oregon law (ORS 316.027) clarifies that individuals qualifying for this federal exemption are not considered residents for the purpose of calculating Oregon individual income taxes.

This tax expenditure includes the following components listed separately by the federal Joint Committee on Taxation:

- Exclusion of Foreign Earned Income: Housing.
- Exclusion of Foreign Earned Income: Salary.

PURPOSE

“Historically, the foreign-earned income and housing cost exclusions have been defended on the grounds that they help increase U.S. exports, because Americans working abroad play an important role in promoting the sale of U.S. goods abroad.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

U.S. citizens who live and work abroad.

EVALUATION

See Exclusion of Foreign Earned Income: Housing and Salary, *Assessment*, p. 37 in [Tax Expenditures: Compendium of Background Material on Individual Provisions, 2022](#).

1.017 CANCELLATION OF MORTGAGE DEBT

Internal Revenue Code Section: 108

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: 12-31-2025

Year Enacted: 2007

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,500,000	\$1,500,000
2025-27	Not Applicable	Less than \$500,000	Less than \$500,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

In general, when a “discharge of indebtedness” occurs, the forgiven debt is considered income to the taxpayer. An exception is allowed for debt discharged through 2025 up to \$2 million (\$1 million if married filing separately) if the

debt was incurred to acquire, construct, or substantially improve the taxpayer’s principal residence. The Taxpayer Certainty and Disaster Tax Relief Act of 2020 extended this provision, which was to expire in tax year 2020, through tax year 2025.

PURPOSE

“A rationale for excluding canceled mortgage debt income has focused on minimizing hardship for households in distress.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Taxpayers who have had eligible debt discharged.

EVALUATION

See Exclusion of Income Attributable to the Discharge of Principal Residence Acquisition Indebtedness, *Assessment*, p. 435 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.018 EMPLOYER PAID GROUP LIFE INSURANCE PREMIUMS

Internal Revenue Code Section: 79

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1920

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$35,000,000	\$35,000,000
2025-27	Not Applicable	\$36,000,000	\$36,000,000

DESCRIPTION

The cost of employer provided group term life insurance plans that satisfy “anti-discrimination” provisions, net of employee contributions, above a \$50,000 (not indexed to inflation) coverage threshold is excluded from the employees’ gross income.

PURPOSE

The Congressional Research Service did not state a clear purpose for this federal provision. Presumably, the purpose is to encourage employers and employees to incorporate life insurance benefits into compensation packages without discriminating between type of employee. An example of discriminating between employees would be offering insurance benefits to officers, owners, and/or highly compensated employees only.

WHO BENEFITS

Employees who have some life insurance premiums paid by their employer.

EVALUATION

See Exclusion of Other Employee Benefits: Premiums on Group Term Life Insurance, *Assessment*, p. 1089 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.019 EMPLOYER PAID ACCIDENT AND DISABILITY INSURANCE

Internal Revenue Code Section: 105 and 106

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1954

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$54,000,000	\$54,000,000
2025-27	Not Applicable	\$57,000,000	\$57,000,000

DESCRIPTION

Employer payments for employee accident and disability insurance premiums are not included in the employee's personal taxable income. Benefits paid to employees are generally taxable, however payments that relate to permanent injuries are excluded from taxable income so long as those payments are computed without regard to the amount of time an employee is absent from work.

PURPOSE

To encourage employers and employees to incorporate accident and disability insurance into compensation packages.

WHO BENEFITS

Employees who have some accident and disability insurance premiums paid by their employer.

EVALUATION

See Exclusion of Other Employee Benefits: Premiums on Accident and Disability Insurance, *Assessment*, p. 1092 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.020 EMPLOYER PROVIDED ON-SITE GYMS

Internal Revenue Code Section: 132(j)(4)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1984

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$16,000,000	\$16,000,000
2025-27	Not Applicable	\$15,000,000	\$15,000,000

DESCRIPTION

The value that employees gain from having access to an on-site athletic facility provided and operated by their employer is exempt from personal income tax. The exemption applies if substantially all of the users of the facilities are employees, their spouses, and their children.

PURPOSE

To codify the traditional treatment of these benefits as not contributing to taxable income and to avoid the difficulty of monitoring and assigning values to them.

WHO BENEFITS

Employees with access to employer-provided on-site gyms at their workplace.

EVALUATION

See Exclusion of Employer-Provided (On-Site) Gyms, *Assessment*, p. 820 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.021 MISCELLANEOUS FRINGE BENEFITS

Internal Revenue Code Section: 132 and 117(d)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1984

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$82,000,000	\$82,000,000
2025-27	Not Applicable	\$81,000,000	\$81,000,000

DESCRIPTION

Certain fringe benefits are exempt from personal income tax. These benefits include no-additional-cost services (such as free standby flights for airline employees), qualified employee discounts, working condition fringe benefits, and low value fringe benefits (such as providing coffee to employees or allowing them occasional personal use of an office copy machine). Also included are subsidized parking and eating facilities. The provision of these fringe benefits must meet certain “anti-discrimination” rules to qualify. The benefits must be provided solely to employees, their spouses, and dependent children; retired employees; or the widows or widowers of former employees.

PURPOSE

To codify the traditional treatment of these benefits as not contributing to taxable income and to avoid the difficulty of monitoring and assigning values to them.

WHO BENEFITS

Employees receiving fringe benefits.

EVALUATION

See Exclusion of Miscellaneous Fringe Benefits, *Assessment*, p. 814 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.022 EMPLOYEE MEALS AND LODGING (NONMILITARY)

Internal Revenue Code Section: 119 and 132(e)(2)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1918

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$89,000,000	\$89,000,000
2025-27	Not Applicable	\$83,000,000	\$83,000,000

DESCRIPTION

Employees do not include in personal taxable income the fair market value of meals furnished by employers if the meals are furnished on the employer’s business premises and for the convenience of the employer. In certain situations, this includes the value of meals provided to an employee at a subsidized eating facility operated by the employer.

Fair market value of lodging provided by the employer can also be excluded from income, if the lodging is furnished on business premises for the convenience of the employer, and if the employee is required to accept the lodging as a condition of employment.

The Tax Cuts and Jobs Act of 2017 included a provision denying businesses a tax deduction for 50 percent of expenses for meals provided to employees for the convenience of the employer. The federal Joint Committee on Taxation lists the increased tax paid by employers under these provisions as a “negative tax expenditure.” Oregon’s law defining tax

expenditures does not contemplate this type of negative tax expenditure, so an estimate of the impact of the associated tax increase for Oregon corporate tax is not included. Predominantly the reduction in taxes paid by employees is reflected in the estimated revenue loss above. This revenue impact would also include a small amount from a “negative tax expenditure” for businesses that report their business income on their federal personal income tax return, as the Joint Committee on Taxation reports only a net revenue impact.

PURPOSE

To eliminate record keeping difficulties and to acknowledge that the fair market value of employer provided meals and lodging may be difficult to measure.

WHO BENEFITS

Employees who are furnished exempt meals or lodging by their employers.

EVALUATION

See Treatment of Meals and Lodging (Other Than Military), *Assessment*, p. 785 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.023 EMPLOYEE STOCK OWNERSHIP PLANS

Internal Revenue Code Section: 401(a)(28), 404(a)(9), 404(k), 415(c)(6), 512(e), 1042, 4975(d)(3), 4978, and 4979A
Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1974

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$26,000,000	\$24,000,000	\$50,000,000
2025-27	\$29,000,000	\$23,000,000	\$52,000,000

DESCRIPTION

An Employee Stock Ownership Plan (ESOP) is a defined contribution plan (similar to a 401(k) plan) that is required to invest primarily in the stock of the sponsoring employer. Generally, sponsoring employers provide the funds for the ESOP to purchase the stock for the benefit of their employees—no contribution from the employee is required, but the employees are the owners of the stock.

Employees are not taxed on the employer contributions or the earnings on invested funds until they are distributed. An employer may deduct dividends paid on stock held by an ESOP if the dividends are paid to plan participants, if the dividends are used to repay a loan that was used to buy the stock, or for dividends paid on stock in a retirement plan.

Under certain circumstances, a stockholder may defer the recognition of the gain from the sale of stock to an ESOP. The estimated tax benefit is a net figure; the revenue foregone in a given year is offset by the amount of tax paid on distributions in that year.

PURPOSE

According to the Congressional Research Service, the purpose of the tax incentive is to broaden employee stock ownership, provide employees with a source of retirement income, and grant employers a tax favored means of financing.

WHO BENEFITS

Employers and employees of participating companies.

EVALUATION

See Special Tax Provisions for Employee Stock Ownership Plans (ESOPs), *Assessment*, p. 770 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.024 EMPLOYEE AWARDS

Internal Revenue Code Section: 74(c) and 274(j)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1986

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$4,000,000	\$4,000,000
2025-27	Not Applicable	\$4,000,000	\$4,000,000

DESCRIPTION

Tangible personal property given as awards to employees for length of service or for safety are excluded from personal taxable income. The amount of the exclusion is usually limited to \$400 but may be as much as \$1,600 for individual awards given as part of qualified employee achievement rewards plan. There are certain qualification requirements to ensure that the awards do not constitute disguised compensation.

PURPOSE

To encourage longevity in employment and safety practices on the job.

WHO BENEFITS

Employees who receive length of service or safety awards.

EVALUATION

See Exclusion of Employee Awards, *Assessment*, p. 781 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.025 EMPLOYER PROVIDED EDUCATION BENEFITS

Internal Revenue Code Section: 127 and 3121(a)(18)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1978

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$14,000,000	\$14,000,000
2025-27	Not Applicable	\$11,000,000	\$11,000,000

DESCRIPTION

Employer-provided graduate and undergraduate assistance benefits are excluded from the personal taxable income of the recipient if they are part of an educational assistance program. The limit on the annual exclusion is \$5,250, which is not indexed for inflation. Characteristics of the program must include the following:

- The program must not discriminate in favor of highly compensated employees.
- Assistance provided to employees owning more than 5 percent of the business may not exceed more than 5 percent of the benefits.
- Employees must have reasonable notification of the program's availability and terms.

Educational assistance includes the payment of tuition, fees, books, supplies, and equipment; however, it does not include items such as meals, lodging, and transportation. The exclusion does not apply to education pertaining to sports, games, or hobbies unless they involve the employer's business. Through 2025, student loan payments are eligible expenses.

PURPOSE

According to the Congressional Research Service, the purpose of the exclusion is to encourage employers to offer educational assistance to employees.

WHO BENEFITS

Employees receiving employer-provided educational assistance.

EVALUATION

See Exclusion of Employer-Provided Education Assistance Benefits, *Assessment*, p. 764 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.026 SPREAD ON ACQUISITION OF STOCK

Internal Revenue Code Section: 421, 422, and 423

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1981

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$9,500,000	\$9,500,000
2025-27	Not Applicable	\$10,000,000	\$10,000,000

DESCRIPTION

Employees who have been granted stock options under a qualified plan are allowed to exercise, or buy, those options within a specified time frame. Generally, these provisions provide options to employees allowing them to buy stock for less than the current market price. At the time the employee exercises his or her options, the stock is transferred from the company to the employee, but the difference in value between the market value and the option price is not immediately included in taxable income. The value of this exemption is that the tax is deferred until the employee sells the stock.

Contrary to normal treatment of compensation paid to employees, the employers that grants qualified options are not allowed to deduct the options as an expense. As a result, employers pay higher taxes than they would without these provisions. The Joint Committee on Taxation lists the increased tax paid by employers under these provisions as a “negative tax expenditure.” Oregon’s law defining tax expenditures doesn’t contemplate this type of negative tax expenditure, so an estimate of the impact of the associated tax increase for Oregon corporate tax is not included. Predominantly the reduction in taxes paid by employees is reflected in the estimated revenue loss above. This revenue impact would also include a small amount from a “negative tax expenditure” for businesses that report their business income on their federal personal income tax return, as the Joint Committee on Taxation reports only a net revenue impact.

This tax expenditure includes the following components listed separately by the federal Joint Committee on Taxation:

- Deferral of Taxation on Spread on Acquisition of Stock under Incentive Stock Option Plans.
- Deferral of Taxation on Spread on Employee Stock Purchase Plans.

PURPOSE

“The Economic Recovery Tax Act of 1981 (P.L. 97-34) reinstated special rules for qualified stock options with the justification that encouraging the management of a business to have a proprietary interest in its successful operation would provide an important incentive to expand and improve the profit position of the companies involved.”(Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Taxpayers who receive stock options as a form of compensation.

EVALUATION

See Assessments for tax expenditures related to spread on acquisition of stock, p. 789 and 795 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.027 MEAL AND ENTERTAINMENT EXPENSES

Internal Revenue Code Section: 274

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1962

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$7,500,000	\$7,500,000
2025-27	Not Applicable	\$8,000,000	\$8,000,000

DESCRIPTION

Employees do not include in personal taxable income the fair market value of entertainment provided by their employers. Employee holiday parties or annual picnics might be examples of employer-provided entertainment excluded by this provision.

The Tax Cuts and Jobs Act of 2017 included a provision denying businesses a tax deduction for most entertainment expenses. The federal Joint Committee on Taxation lists the increased tax paid by employers under these provisions as a “negative tax expenditure.” Oregon’s law defining tax expenditures does not contemplate this type of negative tax expenditure, so an estimate of the impact of the associated tax increase for Oregon corporate tax is not included. Predominantly the reduction in taxes paid by employees is reflected in the estimated revenue loss above. This revenue impact would also include a small amount from a “negative tax expenditure” for businesses that report their business income on their federal personal income tax return, as the Joint Committee on Taxation reports only a net revenue impact.

PURPOSE

To eliminate record keeping difficulties and to acknowledge that the fair market value of employer provided entertainment may be difficult to measure.

WHO BENEFITS

Employees who are furnished exempt entertainment by their employers.

EVALUATION

See Treatment of Meals and Entertainment, Assessment, p. 825 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.028 VETERANS' BENEFITS AND SERVICES

Federal Code: U.S. Code Title 38, Section 5301

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1917

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$160,000,000	\$160,000,000
2025-27	Not Applicable	\$170,000,000	\$170,000,000

DESCRIPTION

All benefits provided by the U.S. Department of Veterans Affairs (VA) are excluded from the personal taxable income of recipients, including disability compensation, pensions, and GI bill benefits.

This tax expenditure includes the following components listed separately by the federal Joint Committee on Taxation:

- Exclusion of Veteran’s Disability Compensation.
- Exclusion of Veteran’s Pensions.
- Exclusion of Veteran’s Readjustment [GI bill] Benefits.

PURPOSE

“Many have concluded that the exclusion is in recognition of the extraordinary sacrifices made by armed forces personnel, especially during periods of war.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Veterans, their survivors, and dependents and their families receiving benefits from the VA.

EVALUATION

See Assessments for tax expenditures related to veterans' benefits and services, p. 1118, 1124, and 1128 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.029 MILITARY AND DEPENDENTS TRICARE INSURANCE

Internal Revenue Code Section: 112 and 134

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1925

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$98,000,000	\$98,000,000
2025-27	Not Applicable	\$110,000,000	\$110,000,000

DESCRIPTION

Health insurance benefits, such as medical and dental benefits, provided to dependents of active-duty military personnel as well as retired military and their dependents are not taxed. Some medical care for such dependents is provided in military facilities and by military doctors on a space available basis. The tax expenditure for benefits not taxed for active-duty military personnel is described in [1.051, Benefits and Allowances of Armed Forces Personnel](#).

The Department of Defense (DOD) has implemented TRICARE, in an effort to coordinate the efforts of armed services’ medical facilities and civilian providers. Beneficiaries can receive care under one of three options:

- TRICARE Prime, a DOD-managed HMO
- TRICARE Extra, a preferred-provider organization
- TRICARE Standard, a fee-for-service option that provides access to any authorized provider but at a higher copayment.

Under the latter two options, beneficiaries are reimbursed for portions of the costs of health care received from civilian providers. Retirees and their dependents who are eligible for Medicare and participate in Medicare Part B are allowed to retain their TRICARE coverage, which includes pharmaceutical benefits.

The revenue estimate is based on two provisions listed separately by the federal Joint Committee on Taxation. The two provisions arise by differentiating between recipients based on their eligibility for Medicare.

PURPOSE

“In 1925, the United States Court of Claims, in its ruling in *Jones v. United States*, 60 Ct. Cl. 552 (1925), drew a sharp distinction between the pay and the allowances received by military personnel. The court ruled that housing and housing allowances for these individuals constituted reimbursements similar to other tax-exempt benefits received by employees in the executive and legislative branches.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Retired military personnel receiving medical benefits for themselves or their dependents, and active-duty military members receiving medical care benefits for their dependents.

EVALUATION

See Assessments for tax expenditures related to military and dependents medical care and insurance, p. 973 and 980 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.030 CASH ACCOUNTING, OTHER THAN AGRICULTURE

Internal Revenue Code Section: 446 and 448

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1916

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$5,000,000	\$16,000,000	\$21,000,000
2025-27	\$5,000,000	\$15,000,000	\$20,000,000

DESCRIPTION

Employee-owned service businesses and small businesses with average annual gross receipts of less than \$26 million (as of 2022) for the prior three years are allowed to choose the cash method of accounting instead of the accrual method.

The Tax Cuts and Jobs Act of 2017 increased the gross receipts threshold for tax years beginning in 2018 and added indexing for inflation. The prior threshold was \$5 million in gross receipts.

This expenditure changes the timing of reporting earnings and expense but is classified here as an exclusion of income. Using the cash method of accounting for tax purposes effectively defers corporation and personal income tax by allowing qualified businesses to record income when it is received rather than when it is earned.

This expenditure relates to "Cash Accounting for Agriculture", which is among the Joint Committee on Taxation's list of de minimis tax expenditures. More information about this expenditure may be found on p. 327 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

PURPOSE

“Most self-employed individuals and many other smaller businesses use the cash method of accounting for tax purposes because recordkeeping is less burdensome. [...] The Revenue Act of 1916 allowed businesses to calculate their taxable income using the same accounting method they used to compute their income for financial reporting”. (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Primarily, owners of eligible small businesses and professional service corporations of all sizes.

EVALUATION

See Cash Accounting, Other than Agriculture, Assessment, p. 527 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.031 INVENTORY METHODS OF VALUATION

Internal Revenue Code Section: 475, 491–492

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1938

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$11,000,000	\$2,000,000	\$13,000,000
2025-27	\$11,000,000	\$2,000,000	\$13,000,000

DESCRIPTION

A taxpayer who sells goods must generally maintain inventory records to determine the cost of goods sold. Inventory can be kept by tracking individual items or may use several other methods.

The method that is considered normal for purposes of this tax expenditure is FIFO (first-in, first-out, assuming the most recent good sold is the earliest one purchased). The method with the largest difference versus FIFO is known as LIFO (last-in, first-out, assuming the most recent good sold is the last one purchased). If using FIFO, a taxpayer with inventory that is valued below cost may choose the lower of cost or market (LCM) method which allows the taxpayer a further tax reduction. Taxpayers may also use a method known as "specific identification" to specify which lots are sold and which are valued in inventory.

The federal Joint Committee on Taxation lists estimates of the impact for the first two alternate methods separately, but the bulk of the impact of this provision is from the LIFO method. The Joint Committee on Taxation considers the impact of the "specific identification" method as de minimis and is therefore not included in this estimate.

PURPOSE

When LIFO was adopted for tax purposes in 1939, the "reason for adopting it was to allow a standard accounting practice." In 1981, LIFO reporting was simplified, "...by allowing a simplified dollar value method that could be applied to all inventory by small businesses and allowed the use of external indexes. The reason was to make the method that most effectively mitigates the effects of inflation more accessible to all businesses." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Business taxpayers who use alternate methods of valuing their inventory.

EVALUATION

See Inventory Methods and Valuation: LIFO, LCM, and Specific Identification, *Assessment*, p. 584 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.032 ENERGY CONSERVATION SUBSIDIES (FEDERAL)

Internal Revenue Code Section: 136

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1992

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$500,000	\$500,000
2025-27	Not Applicable	\$500,000	\$500,000

DESCRIPTION

Residential energy customers can exclude from personal taxable income subsidies provided by public utilities for the purchase or installation of an energy conservation improvement.

Subsidies paid to corporations are not exempt under this federal provision but can be subtracted from gross income under 1.320, [Energy Conservation Subsidies \(Oregon\)](#).

PURPOSE

According to the Congressional Research Service, the purpose of the exclusion is to encourage residential customers of public utilities to participate in conservation programs sponsored by the utility. This would enhance energy efficiency of dwelling units and encourage energy conservation in residential buildings.

WHO BENEFITS

Homeowners who participate in conservation programs and receive rebates to install energy saving devices.

EVALUATION

See Exclusion of Energy Conservation Subsidies Provided by Public Utilities, *Assessment*, p. 124 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.033 PASS-THROUGH STATUS OF SPECIFIED PUBLICLY TRADED PARTNERSHIPS

Internal Revenue Code Section: 7704

Oregon Statute: 317.013 (Connection to federal corporation taxable income)

Sunset Date: None

Year Enacted: 1987

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$4,500,000	Not Applicable	\$4,500,000
2025-27	\$6,500,000	Not Applicable	\$6,500,000

DESCRIPTION

With a few exceptions, publicly traded partnerships that receive at least 90 percent of their gross income from qualifying sources are treated as pass-through entities for tax purposes and are exempt from corporate taxes that would otherwise apply. This exemption is an exception to general rules that subject partnerships traded on established securities markets to corporate taxes.

Qualifying income sources include interest, dividends, property rental income and gain from disposition of real property. In addition, income derived from certain activities related to energy or mining of natural resources also qualifies. The federal Joint Committee on Taxation classifies this as a tax expenditure affecting personal income taxpayers and lists one provision for energy and another for mining.

PURPOSE

The Congressional Research Service notes that proponents of these policies may argue, "...that the industries targeted through the definition of qualified income have reason to be subsidized, and government policy should help spur investment and growth" in the energy sector and the exploration of natural resources. (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Owners of publicly traded partnerships that are exempt from corporate-level taxation.

EVALUATION

See Assessments for tax expenditures related to pass through status of specified publicly traded partnerships, p. 113 and 303 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.034 EMPLOYER PAID TRANSPORTATION BENEFITS

Internal Revenue Code Section: 132(f)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None (TCJA suspension of bike benefits is temporary, see description)

Year Enacted: 1984

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$53,000,000	\$53,000,000
2025-27	Not Applicable	\$52,000,000	\$52,000,000

DESCRIPTION

In general, all compensation (wages and benefits) of an employee is taxable income of the employee. This provision exempts employer payments for employee parking, transportation in a commuter highway vehicle, and transit passes from inclusion in employees' personal taxable income. Employees can use pretax dollars, if their employer allows, to pay for transit passes, vanpool fares, and parking. Parking facilities provided free of charge by the employer are also excludable from income. Employees are allowed to elect taxable cash compensation in lieu of qualified transportation fringe benefits.

For 2024, the maximum exclusion for parking, transit, and commuter transportation is \$315 per month, which is adjusted each year for inflation.

The Tax Cuts and Jobs Act of 2017 (TCJA) made these benefits non-deductible for employers that provide them. The federal Joint Committee on Taxation lists the increased tax paid by employers under these provisions as a "negative tax expenditure." Oregon's law defining tax expenditures does not contemplate this type of negative tax expenditure, so an estimate of the impact of the associated tax increase for Oregon corporate tax is not included. Predominantly, the reduction in taxes paid by employees is reflected in the estimated revenue loss above. This revenue impact would also include a small amount from a "negative tax expenditure" for businesses that report their business income on their federal personal income tax return, as the Joint Committee on Taxation reports only a net revenue impact.

TCJA also suspended the bicycle commuting exclusion for 2018 through 2025. The maximum exclusion for qualified bicycle commuting expenses was \$20 per month for employees who regularly used a bicycle for commuting and did not receive other commuting benefits. The maximum exclusion for bicycle commuting is not adjusted for inflation.

PURPOSE

According to the Congressional Research Service, the exclusions for mass transit and commuter transportation were introduced because "Subsidies for mass transit and vanpools encourage use of mass transportation and may reduce congestion and pollution." The parking benefit was given a statutory exclusion in 1984 because some employers had been providing free parking as a fringe benefit, "for many years, and employers, employees, and the Internal Revenue Service had not considered [it] taxable." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

The exclusion benefits both employers and employees. Employees benefit through higher compensation while their employers may benefit through lower wage costs. To the extent this exemption induces employees to use mass transportation, and assuming mass transportation reduces congestion, this exemption may lower commuting costs to all workers in urban areas.

EVALUATION

See Treatment of Employer-Paid Transportation Benefits (Parking, Van Pools, and Transit Passes, Black Car Services), *Assessment*, p. 616 in [Tax Expenditures: Compendium of Background Material on Individual Provisions, 2022](#).

1.035 CERTAIN DISASTER MITIGATION PAYMENTS

Internal Revenue Code Section: 139(g)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 2005

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$500,000	\$1,000,000	\$1,000,000
2025-27	Less than \$500,000	\$500,000	\$500,000

DESCRIPTION

Disaster mitigation payments made to the owner of a property to mitigate hazards to that property, as paid through the Robert T. Stafford Disaster Relief and Emergency Assistance Act or the National Flood Insurance Act, are excluded from taxable income.

PURPOSE

To retain the value of disaster mitigation payments by not imposing tax on those payments.

WHO BENEFITS

Recipients of specified disaster mitigation payments.

EVALUATION

See Exclusion of Disaster Mitigation Payments, *Assessment*, p. 1002 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.036 CREDIT UNION INCOME

Internal Revenue Code Section: 501(c)(14) and 12 U.S.C. § 1768

Oregon Statute: 317.080(1)

Sunset Date: None

Year Enacted: 1951

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$32,000,000	Not Applicable	\$32,000,000
2025-27	\$37,000,000	Not Applicable	\$37,000,000

DESCRIPTION

Credit unions without capital stock, organized and operated for mutual purposes and without profit are exempt from corporate income taxation. Credit unions are nonprofit cooperatives organized by people with a common bond that distinguishes them from the general public. Members pool their funds to make loans to one another. Credit unions may be more likely to provide services to low-income individuals at rates lower than other financial institutions.

Credit union members with deposits pay federal income tax on interest earned on those deposits, independent of this federal provision.

Before 1951, the income of mutual banks, savings and loans, and credit unions was not taxed. In 1951, the exemption from mutual banks and savings and loans was removed, but credit unions retained the exemption.

PURPOSE

In 1951, at the time that the exemption for mutual banks and savings and loan institutions was removed, no specific reason was given for continuing the exemption of credit unions. "Supporters of the credit union exemption emphasize the uniqueness of credit unions compared to other depository institutions." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Credit unions meeting the eligibility requirements.

EVALUATION

See Exemption of Credit Union Income, *Assessment*, p. 342 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.037 ELIMINATION OF TAX EXEMPT INTEREST ALLOCATION FOR BANKS

Internal Revenue Code Section: 265(a), 265(b), 291(e) and 141

Oregon Statute: 317.013 (Connection to federal corporation taxable income)

Sunset Date: None

Year Enacted: 2009

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$4,500,000	Not Applicable	\$4,500,000
2025-27	\$4,500,000	Not Applicable	\$4,500,000

DESCRIPTION

This tax expenditure is a modification from complex rules intended to keep financial institutions from benefiting from two tax exemptions on interest on tax exempt bonds. Financial institutions normally deduct the interest they pay depositors from their income as a business expense. The interest deduction is required to be reduced by the percentage of a financial institution's investments that are in tax-free bonds.

For bonds issued in 2009 and 2010, the reduced interest deduction does not apply if the financial institution has less than 2 percent of its investments in tax-free bonds, or its tax-free bonds meet certain qualifying criteria.

PURPOSE

According to the Congressional Research Service, "The American Recovery and Reinvestment Act of 2009 (P.L. 111-5) expanded the de minimis level for small issuers and allowed a two-percent safe harbor for financial institutions to stimulate demand for tax-exempt obligations." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Banks that have qualified investments in tax-free bonds.

EVALUATION

See Eliminate Requirement that Financial Institutions Allocate Interest Expense Attributable to Tax-Exempt Interest, *Assessment*, p. 1146 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.038 WORKERS' COMPENSATION BENEFITS (MEDICAL)

Internal Revenue Code Section: 104(a)(1)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1918

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$37,000,000	\$37,000,000
2025-27	Not Applicable	\$44,000,000	\$44,000,000

DESCRIPTION

Workers' compensation medical benefits are not included in personal taxable income. These benefits include payments for medical treatment of work-related illness or injury. The revenue impact estimates shown are for workers' compensation medical benefits only; workers' compensation nonmedical benefits are covered in tax expenditure 1.039, [Workers' Compensation Benefits \(Nonmedical\)](#).

PURPOSE

To compensate for the economic hardship imposed by work-related injury, sickness, or death and to be consistent with the tax treatment of court-awarded compensatory damages. See tax expenditure 1.006, [Compensatory Damages](#).

WHO BENEFITS

Any worker covered by the workers' compensation program including injured or ill workers who receive workers' compensation medical benefits.

EVALUATION

See Exclusion of Workers' Compensation Benefits (Medical Benefits), *Assessment*, p. 944 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.039 WORKERS' COMPENSATION BENEFITS (NONMEDICAL)

Internal Revenue Code Section: 104(a)(1)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1918

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$25,000,000	\$25,000,000
2025-27	Not Applicable	\$23,000,000	\$23,000,000

DESCRIPTION

Workers' compensation nonmedical benefits are not included in personal taxable income. Nonmedical workers' compensation benefits are paid to disabled workers in the case of work-related injury or to their families in cases of work-related death. The revenue impact estimates shown above are for workers' compensation nonmedical benefits only. These benefits may include cash earnings replacement payments, special payments for physical impairment, and coverage for certain injury or death-related expenses (e.g., burial costs). The effect of workers' compensation medical benefits is covered in tax expenditure 1.038, [Workers' Compensation Benefits \(Medical\)](#).

PURPOSE

To compensate for the economic hardship imposed by work-related injury, sickness, or death, and to be consistent with the tax treatment of court-awarded compensatory damages. See tax expenditure 1.006, [Compensatory Damages](#), for more information.

WHO BENEFITS

Any worker covered by the workers' compensation program including workers or their families (in cases of work-related death) receiving workers' compensation benefits.

EVALUATION

See Exclusion of Workers' Compensation Benefits (Disability and Survivors Payments), *Assessment*, p. 1007 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.040 GAIN ON NONDEALER INSTALLMENT SALES

Internal Revenue Code Section: 453 and 453A(b)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1921

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$41,000,000	\$8,500,000	\$49,500,000
2025-27	\$46,000,000	\$7,500,000	\$53,500,000

DESCRIPTION

Persons who do not deal regularly in selling property (nondealers) are allowed to defer the tax on gains from sales of property that are not readily tradable by using the installment method of accounting. Under the installment method, gross profit from the sale is prorated over the years during which the payments are received. The deferral of taxes conveys a tax advantage compared to being taxed in full in the year of sale.

Interest must be paid to the federal government on the deferred taxes attributable to the portion of the installment sales that exceed \$5 million. Oregon law (ORS 314.302) requires that interest also be paid to Oregon for these deferred taxes.

PURPOSE

To match the timing of tax payments to the timing of the cash flow generated by the sale of the property. Requiring an up-front payment of taxes by a seller who won't receive the bulk of payments for the property until the future can place a heavy burden on infrequent sellers of property.

WHO BENEFITS

Infrequent sellers of property who sell on an installment basis. "...the primary benefit probably flows to sellers of farms, small businesses, and small real estate investments." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

EVALUATION

See Deferral of Gain on Non-Dealer Installment Sales, *Assessment*, p. 457 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.041 GAIN ON LIKE-KIND EXCHANGES

Internal Revenue Code Section: 1031

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1921

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$10,000,000	\$98,000,000	\$108,000,000
2025-27	\$9,500,000	\$86,000,000	\$95,500,000

DESCRIPTION

Like-kind exchanges are exchanges of properties that are of the same general type but may be of very different quality and use, such as real estate. For exchanges in 2018 or later, the Tax Cuts and Jobs Act of 2017 limits the deferral of gain to real property (generally land and buildings).

Gain at the time of exchange is deferred until the property is ultimately disposed of. In the case of properties being exchanged in a series of transactions, the accumulated gains from each transaction are claimed for tax purposes only in the year the final property in the series is disposed of.

Before 2001, non-Oregon residents were required to claim the accumulated gains on property within Oregon at the time the property was disposed of in exchange for property outside Oregon. Following the passage of HB 2206 in 2001, non-Oregon resident taxpayers are allowed the same benefits as Oregon resident taxpayers in regard to continuing to defer the gains from the Oregon property until the series of like-kind exchanges is ended by the disposal of the final property.

PURPOSE

To recognize that the investment in the new property is much like a continuation of the investment in the old and therefore, is not a taxable event.

WHO BENEFITS

Taxpayers who engage in exchanges of like properties. This type of activity is concentrated in the real estate sector.

EVALUATION

See Deferral of Gain on Non-Dealer Installment Sales, *Assessment*, p. 457 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.042 ALLOWANCES FOR FEDERAL EMPLOYEES ABROAD

Internal Revenue Code Section: 912

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1943

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$4,000,000	\$4,000,000
2025-27	Not Applicable	\$4,000,000	\$4,000,000

DESCRIPTION

U.S. federal civilian employees working abroad are allowed to exclude from personal taxable income certain special allowances that are primarily for the costs of living abroad, such as the costs of housing, education, and travel.

PURPOSE

“Congress determined that federal personnel overseas were engaged in ‘highly important’ duties and that the allowances merely offset the extra costs of working and living abroad. Congress determined that the government should bear the full burden of the excess living costs, including any income taxes that would otherwise be imposed on cost-of-living allowances.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Federal civilian employees working abroad.

EVALUATION

See Exclusion of Certain Allowances for Federal Employees Abroad, *Assessment*, p. 41 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.043 INTEREST ON OREGON STATE AND LOCAL DEBT

Internal Revenue Code Section: 103, 141-146, 501(c)(3)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1913

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$40,400,000	\$40,400,000
2025-27	Not Applicable	\$41,600,000	\$41,600,000

DESCRIPTION

The interest income earned from state or local government obligations is excluded from federal corporate and personal taxable income. Oregon does not allow this exclusion for corporate income taxpayers; however, Oregon does allow this exclusion for personal income taxpayers for interest income from Oregon state or local government obligations. These obligations are primarily bonds issued by the state of Oregon and local government taxing districts such as cities, counties, and school districts. Interest and dividends on bonds and notes of other states or political subdivisions are taxable in Oregon.

These bonds fall into two categories. First, there are governmental bonds in which the bond proceeds generally are used to build capital facilities that are owned and operated by governmental entities and serve the general public interest, such as highways, schools, and government buildings. The majority of the tax benefit falls in this category.

Second, there are qualified private activity bonds where a portion of the bond benefits accrue to individuals or businesses rather than to the general public. These include state and local government bonds for: energy production, local furnishing of electric energy or gas, and local district heating or cooling facilities; sewage, water as well as solid and hazardous waste facilities; owner-occupied, rental, and veterans' housing; small issue industrial development; high-speed rail, private airports, docks, mass-commuting, highway and surface freight transfer facilities; student loans and public education facilities; private nonprofit hospital facilities; carbon capture facilities; broadband projects; green building and sustainable design projects. Many of these bonds are subject to the state private activity bond annual volume cap set by the federal government.

Interest income on qualified private activity bonds is exempt from federal income tax as well as Oregon income tax. There are other nonqualified private activity bonds. The interest earned on these bonds is taxable at the federal level but not at the state level. See tax expenditure [1.316, Interest from State and Local Government Bonds](#), for more information.

PURPOSE

"... many believe the exemption for governmental bonds is still justified on economic grounds, principally as a means of encouraging state and local governments to invest in public capital." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022). Presumably, the exclusion is allowed for interest from Oregon state or local government obligations for personal income taxpayers as a way to lower the cost of borrowing for Oregon state and local governments.

WHO BENEFITS

In 2022, about 64,800 Oregon taxpayers reported nontaxable interest income from Oregon state or local government debt obligations, saving a total of about \$18.9 million in tax.

EVALUATION

See Exclusion of Interest on Public Purpose State and Local Government Bonds, *Assessment*, p. 1133 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.044 VOLUNTARY EMPLOYEES' BENEFICIARY ASSOCIATIONS

Internal Revenue Code Section: 419, 419A, 501(a), 501(c)(9), 512(a)(3), and 4976

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1928

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$16,000,000	\$16,000,000
2025-27	Not Applicable	\$16,000,000	\$16,000,000

DESCRIPTION

Voluntary Employees' Beneficiary Associations (VEBAs) generally fund the expenses of life insurance, medical, accident, and other benefits to associations of employees, their dependents, and their beneficiaries. If certain requirements are met, contributions to and income earned by VEBAs can be exempt from income taxes. Depending on the circumstances, benefit distributions to recipients from VEBAs may or may not be taxable.

PURPOSE

To promote the provision of life, sickness, accident, and other insurance and fringe benefits and the structuring of benefits in an irrevocable trust fund associated with a VEBA.

WHO BENEFITS

Recipients of the program benefits and employers who contribute.

EVALUATION

See Exclusion of Income Earned by Voluntary Employees' Beneficiary Associations, *Assessment*, p. 809 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.045 RENTAL ALLOWANCES FOR CLERGY HOUSING

Internal Revenue Code Section: 107 and 265

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1921

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$7,500,000	\$7,500,000
2025-27	Not Applicable	\$7,500,000	\$7,500,000

DESCRIPTION

Clergy members can exclude from personal taxable income the fair rental value of a home owned or rented by a religious organization or a cash housing allowance paid as part of the clergy member's compensation. While the terms "minister" and "church" are referenced in the Internal Revenue Code, these exclusions apply to clergy in all religions.

PURPOSE

"The exclusion for the housing allowances for ministers entered the federal tax code through the Revenue Act of 1921. There is no record of why Congress did so. ... Congress may have intended to provide tax relief to a segment of society that was widely seen as essential to the spiritual welfare of Americans, but that often experienced economic deprivation because of their relatively low salaries." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Clergy members who receive a housing allowance or who live in a home provided by the religious organization.

EVALUATION

See Exclusion of Housing Allowances for Ministers, *Assessment*, p. 800 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.046 DISCHARGE OF CERTAIN STUDENT LOAN DEBT

Internal Revenue Code Section: 108(f), 20 U.S.C. § 1087ee(a)(5)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None (TCJA provisions are temporary, see description)

Year Enacted: 1984

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$12,000,000	\$12,000,000
2025-27	Not Applicable	\$6,500,000	\$6,500,000

DESCRIPTION

Income for tax purposes generally includes cancelled, forgiven, or debt repaid on the borrower's behalf. Discharged student loan debt may be excluded if the relevant loan was made by specified types of lenders, borrowed to assist an individual in attending an educational organization, and contained terms providing that some or all of the loan would be cancelled for work performed for a specified period of time, in a certain profession, and for a specified broad class of employers. Specified lenders include the federal government, state and local governments, public benefit corporations, tax-exempt public benefit corporations, and qualified educational institutions.

The major federal loans qualifying for exempt discharge of indebtedness are the William D. Ford Federal Direct Loan (DL), Federal Perkins Loan, and the Federal Family Education Loan (FFEL – no longer available, however any amount remaining amount on the loan that is cancelled may be excluded). This provision also excludes repayment of loans on behalf of graduates made under the National Health Service Corps repayment program.

The Tax Cuts and Jobs Act of 2017 temporarily expanded this provision, allowing discharge due to death or permanent disability to qualify in tax years 2018 through 2025. The American Rescue Plan Act (ARPA) of 2021 broadened this temporary expansion to include loans discharged for almost any reason.

PURPOSE

To encourage individuals to work for federal, state, or local government agencies and school districts where discharge of a student loan is offered as an incentive.

WHO BENEFITS

Individuals with student loans discharged under the program.

EVALUATION

See Exclusion of Income Attributable to the Discharge of Certain Student Loan Debt and Certain Federal and State Education Loan Repayment Programs, *Assessment*, p. 748 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.047 CAPITAL GAINS ON INHERITED PROPERTY

Internal Revenue Code Section: 303, 1001, 1014, 1023, 1040, 1221, and 1222

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1921

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$690,000,000	\$690,000,000
2025-27	Not Applicable	\$730,000,000	\$730,000,000

DESCRIPTION

In general, capital gains are taxed based on the increased value of property when it is sold or exchanged. However, when property is transferred at death, unrealized capital gains on the property are excluded from personal taxable income. The new basis for the heir is set to the market value on the date of the decedent's death. The revenue loss estimates do not reflect any potential tax liability associated with Oregon's estate tax.

In addition, income from redemption of stock (selling stock back to the corporation) after the decedent's death receives the new basis and is treated as a capital gain if the stock is more than 35 percent of the estate and the redemption value does not exceed the expenses or taxes associated with the estate. This redemption of stock is listed as a separate expenditure by the federal Joint Committee on Taxation, but income from redemption of stock represents a very small part of this tax expenditure.

PURPOSE

At the federal level, this treatment is intertwined with the treatment of gifts given while a person is alive ("*inter vivos* gifts"). "The original rationale for nonrecognition of capital gains on *inter vivos* gifts or transfers at death is not indicated in the legislative history of any of the several interrelated applicable provisions. One current justification given for the treatment, however, is that death and *inter vivos* gifts are considered as inappropriate events to result in the recognition of income." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Recipients of inherited assets with accumulated capital gains.

EVALUATION

See Assessments for tax expenditures related to capital gains on inherited property, p. 454 and 580 [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.048 CAPITAL GAINS ON GIFTS

Internal Revenue Code Section: 1015, 1023, 1040, 1221, and 1222

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1921

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$49,000,000	\$49,000,000
2025-27	Not Applicable	\$40,000,000	\$40,000,000

DESCRIPTION

When a gift is made, any capital gain accrued on the property while held by the donor is excluded from personal taxable income until the recipient disposes of the property. The recipient is taxed on the capital gains at the time of sale

of the property. The tax expenditure is the net value of deferred taxes in a given year, minus the taxes on realized gains deferred in prior years.

PURPOSE

At the federal level, gifts given while a person is alive are often called “*inter vivos* gifts” to distinguish them from inherited property given at the time of death. “The original rationale for nonrecognition of capital gains on *inter vivos* gifts or transfers at death is not indicated in the legislative history of any of the several interrelated applicable provisions. One current justification given for the treatment, however, is that death and *inter vivos* gifts are considered as inappropriate events to result in the recognition of income.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Donors and recipients of gifts.

EVALUATION

See Carryover Basis of Appreciated Property Transferred by Gifts, *Assessment*, p. 532 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.049 LIFE INSURANCE PROCEEDS

Internal Revenue Code Section: 101

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1913

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$15,000,000	\$120,000,000	\$135,000,000
2025-27	\$16,000,000	\$130,000,000	\$146,000,000

DESCRIPTION

Life insurance proceeds paid to a beneficiary because of the death of the insured person are generally excluded from taxable income. A few cases exist where proceeds may be included in taxable income, including interest on a delayed payment or certain profits from selling a policy during the lifetime of the insured person.

PURPOSE

Presumably, the purpose is to support family members and businesses that receive a payment from a life insurance policy.

WHO BENEFITS

Beneficiaries of untaxed life insurance proceeds.

EVALUATION

See Exclusion of Amounts Received Under Life Insurance Contracts, *Assessment*, p. 1096 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.050 DISABILITY BENEFITS OF MILITARY AND VICTIMS OF TERRORISM

Internal Revenue Code Section: 104(a)(4)-(5) and 104(b)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1942

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$3,000,000	\$3,000,000
2025-27	Not Applicable	\$3,500,000	\$3,500,000

DESCRIPTION

Individuals who were members of the armed forces on or before September 24, 1975, may be eligible for the exclusion of disability pay from personal taxable income. In addition, under the Victims of Terrorism Tax Relief Act of 2001, any civilian or member of the military whose disability is attributable to terrorism or military action anywhere in the world may exclude disability income from gross income.

For members of the armed forces, the amount of disability pay is calculated as the greater of:

- The percentage of disability multiplied by the terminal monthly basic pay
- The terminal monthly basic pay multiplied by the number of service years times 2.5.

If the percentage-of-disability method is used, the entire amount is excludable from taxable income. If the years-of-service method is used, only the portion that would have been paid under the percentage-of-disability method is excludable.

Members of the armed forces who joined after September 24, 1975, may exclude Department of Defense disability payments equivalent to disability payments they could have received from the Veterans' Administration. Otherwise, disability pensions may be excluded only if the disability is combat related.

PURPOSE

To compensate for the economic hardship imposed by injury or sickness and to be consistent with the tax treatment of workers' compensation payments and court-awarded damages, which also are not taxed.

WHO BENEFITS

Veterans or victims of terrorism receiving excluded disability payments.

EVALUATION

See Exclusion of Military Disability Benefits, *Assessment*, p. 27 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.051 BENEFITS AND ALLOWANCES OF ARMED FORCES PERSONNEL

Internal Revenue Code Section: 112 and 134

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1925

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$64,000,000	\$64,000,000
2025-27	Not Applicable	\$66,000,000	\$66,000,000

DESCRIPTION

Various in-kind benefits received by military personnel are not taxed. These benefits include medical and dental benefits, group term life insurance, professional education and dependent education, moving and storage, premiums for survivor and retirement protection plans, subsistence allowances, uniform allowances, housing allowances, overseas cost of living allowances, evacuation allowances, family separation allowances, travel for consecutive overseas tours, emergency assistance, family counseling and defense counsel, burial and death services, and travel of dependents to a burial site. In addition, payments made to families as death gratuities when members of the armed forces die are tax exempt.

PURPOSE

“For some compensation, the rationale for an exclusion was a desire to reduce the tax burden of military personnel during wartime (e.g., the exclusion for combat pay). For other compensation, the exclusion was based on the belief that the benefits were intrinsic to the military way of life”. (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

People serving in the U.S. military.

EVALUATION

See Exclusion of Benefits and Allowances for Armed Forces Personnel, *Assessment*, p. 22 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.052 COMBAT PAY

Internal Revenue Code Section: 112

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None (TCJA provisions are temporary, see description)

Year Enacted: Pre-1945

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$6,500,000	\$6,500,000
2025-27	Not Applicable	\$7,500,000	\$7,500,000

DESCRIPTION

Compensation paid to members of the U.S. armed forces is generally taxable. This provision excludes income earned by active-duty armed forces members in combat zones. It also applies to members hospitalized for injury received or a disease contracted in a combat zone for up to two years after termination of combatant activities in the combat zone.

The Tax Cuts and Jobs Act of 2017 includes a temporary provision expanding the definition of combat zones to include a “qualified hazardous duty area.” Currently, the definition adds the Sinai Peninsula of Egypt. This provision applies to the portion of the first taxable year ending after June 9, 2015 as well as subsequent taxable years beginning before January 1, 2026.

PURPOSE

“Generally, the compensation paid to military personnel serving in a combat zone is increased to reflect the hazards inherent in such a duty. Excluding combat pay from taxation may reflect a general public recognition that service members should be rewarded for putting their lives at risk.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Active-duty military personnel serving in a combat zone.

EVALUATION

See Exclusion of Combat Pay, *Assessment*, p. 31 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.053 DEFERRAL OF INTEREST ON SAVINGS BONDS

Internal Revenue Code Section: 454(c)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1951

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$4,000,000	\$4,000,000
2025-27	Not Applicable	\$3,500,000	\$3,500,000

DESCRIPTION

Owners of U.S. Treasury Series E, Series EE, and Series I savings bonds have the option of either including interest in taxable income as it accrues or excluding interest from taxable income until the bond is redeemed. The revenue loss shown above is the tax that would be due on the deferred interest if it were reported and taxed as it accrued.

The deferral of tax on interest income on savings bonds provides two advantages. The first advantage is the deferral of any tax payment on the accrued interest, which is equivalent to receiving an interest-free loan. The second advantage results from the taxpayer often being in a lower income tax bracket when the bond is redeemed, such as after the taxpayer has retired.

PURPOSE

The Congressional Research Service reports that the purpose is to encourage holding U.S. savings bonds.

WHO BENEFITS

Holders of savings bonds that defer the inclusion of earned interest in their taxable income. According to the Congressional Research Service, the primary beneficiaries are middle-income taxpayers.

EVALUATION

See Deferral of Interest on Savings Bonds, *Assessment*, p. 1155 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.054 DEFERRAL OF CERTAIN ADVANCE PAYMENTS

Internal Revenue Code Section: 451(c)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation income)

Sunset Date: None

Year Enacted: 2017

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$12,000,000	\$3,500,000	\$15,500,000
2025-27	\$13,000,000	\$3,500,000	\$16,500,000

DESCRIPTION

Taxpayers usually account for income using the accrual method, which accounts for income based on when transactions are made. The Tax Cuts and Jobs Act of 2017 (TCJA) codified an exception with respect to advance payments—i.e. payments received before the goods or services are provided—that had been formerly allowed by administrative guidance. The exception, which applies to tax years beginning after December 31, 2017, allows

taxpayers to defer, for one year only, the recognition of advance payments if the taxpayer's financial accounting statement defers recognition. Payments for goods and services (such as subscriptions and gift cards) are eligible whereas items such as rent and insurance payments are not.

PURPOSE

The Congressional Research Service did not state a clear purpose for this federal provision. Presumably, it is meant to support businesses that receive advance payments. The Congressional Research Service did note, however, that this provision "conforms the recognition of income more closely to financial accounting and is consistent with matching income and costs." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Taxpayers who receive advance payments. According to the Congressional Research Service, this tax expenditure "is used more extensively by unincorporated businesses." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

EVALUATION

See Deferral of Certain Advance Payments, Assessment, p. 600 in [*Tax Expenditures: Compendium of Background Material on Individual Provisions, 2022*](#).

1.101 TEACHER CLASSROOM EXPENSES

Internal Revenue Code Section: 62(a)(2)(D)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 2002

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,900,000	\$1,900,000
2025-27	Not Applicable	\$1,900,000	\$1,900,000

DESCRIPTION

Eligible elementary or secondary school employees are allowed to deduct unreimbursed eligible expenses. The deduction was limited to \$300 in 2023. This amount is adjusted each year for inflation (rounded to the nearest \$50) and can be taken without itemizing (known as an adjustment or above the line deduction).

Eligible expenses are for books, supplies, computer equipment, supplementary materials used in the classroom and professional development. Eligible employees include kindergarten through grade 12 teachers, instructors, counselors, and principals working in a school for at least 900 hours during a school year.

This provision was enacted as a temporary provision in 2002 and was temporarily extended several times. The PATH Act of 2015 (P.L. 114-113) made this provision permanent, added the inflation adjustment, and added professional development as an eligible expense.

PURPOSE

“An above-the-line deduction targeted at educators may be considered desirable because teachers voluntarily augment school funds by purchasing items thought to enhance the quality of children’s education”. (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

In 2022, about 40,400 taxpayers claimed on average an adjustment of \$267, which resulted in a savings of \$22 in Oregon tax due to this provision. The table below shows use of this adjustment for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Adjustment	Average Adjustment	Total Adjusted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	990	\$250	\$0.2	<\$0.1	1%
\$19,400 - \$40,400	2,670	\$240	\$0.7	<\$0.1	6%
\$40,400 - \$67,700	6,160	\$270	\$1.6	\$0.1	16%
\$67,700 - \$117,800	10,770	\$280	\$3.1	\$0.3	30%
Above \$117,800	14,590	\$320	\$4.6	\$0.4	46%
All Full-Year Filers	35,160	\$290	\$10.2	\$0.9	100%
Part-Year and Nonresident Filers	5,220	\$110	\$0.6	<\$0.1	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

See Deduction for Teacher Classroom Expenses, *Assessment*, p. 678 in [Tax Expenditures: Compendium of Background Material on Individual Provisions, 2022](#).

1.102 INTEREST ON STUDENT LOANS

Internal Revenue Code Section: 221

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1997

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$18,200,000	\$18,200,000
2025-27	Not Applicable	\$38,000,000	\$38,000,000

DESCRIPTION

A taxpayer may deduct interest on qualified higher education loans. The maximum deduction is \$2,500 and is not indexed to inflation. The deduction can be taken without itemizing (known as an adjustment or above-the-line deduction). The deduction is not allowed for individuals who may be claimed as a dependent on another taxpayer's return.

A qualified education loan is indebtedness incurred solely to pay for qualified higher education expenses, such as tuition, fees, and room and board. Interest on loans from relatives or qualified employer plans may not be deducted. The qualifying expenses must be reduced by amounts received from other tax-free education benefits.

For 2023, the deduction was phased out for income between \$75,000 and \$90,000 (single) or \$155,000 and \$185,000 (married). For income above those upper amounts, no deduction is allowed. The phase-out range is adjusted for inflation each year.

PURPOSE

"The interest deduction was seen as a way to help taxpayers repay student loan debt, which has risen substantially in recent years." Additionally, "The tax deduction can be justified both as a way of encouraging persons to undertake additional education and as a means of easing repayment burdens". (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Taxpayers who incurred indebtedness to pay qualified higher education expenses for themselves, their spouse, or their dependents. In 2022, approximately 57,900 Oregon taxpayers claimed on average, an adjustment of \$786, which resulted in a savings of \$64 in Oregon tax due to this provision. The table below shows usage of this adjustment for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Adjustment	Average Adjustment	Total Adjusted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	4,050	\$900	\$3.6	\$0.2	5%
\$19,400 - \$40,400	7,340	\$910	\$6.7	\$0.6	16%
\$40,400 - \$67,700	12,530	\$930	\$11.7	\$1.0	30%
\$67,700 - \$117,800	13,500	\$820	\$11.1	\$1.0	28%
Above \$117,800	10,660	\$760	\$8.1	\$0.7	21%
All Full-Year Filers	48,080	\$860	\$41.2	\$3.4	100%
Part-Year and Nonresident Filers	9,810	\$440	\$4.3	\$0.3	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

See Deduction for Interest on Student Loans, *Assessment*, p. 693 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.103 SELF-EMPLOYMENT HEALTH INSURANCE

Internal Revenue Code Section: 162(L)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1986

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$83,000,000	\$83,000,000
2025-27	Not Applicable	\$84,600,000	\$84,600,000

DESCRIPTION

Self-employed individuals may deduct amounts paid for health insurance. The insurance must be for themselves, their spouses, or their dependents. The deduction can be taken without itemizing (known as an adjustment or an above-the-line deduction) and is limited to the taxpayer's earned income. This adjustment is also available to working partners in a partnership and employees of an S corporation who own more than 2 percent of the corporation's stock.

Self-employed individuals may also adjust personal income by amounts paid for qualified long-term care insurance.

PURPOSE

"In establishing the deduction for spending on health insurance and long-term care insurance by the self-employed, Congress seemed to have two motivations. One was to provide those individuals with a tax benefit comparable to the exclusion from the taxable income of any employer-provided health benefits received by employees. A second motive was to improve access to health care by the self-employed." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Self-employed individuals who paid for health and/or long-term care insurance, and their immediate family. In 2022, approximately 80,700 Oregon taxpayers claimed on average an adjustment of \$6,232, which resulted in a savings of \$538 in Oregon tax due to this provision. The table below shows usage of this adjustment for tax year 2022.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Adjustment	Average Adjustment	Total Adjusted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	6,710	\$3,560	\$23.9	\$0.4	1%	
\$19,400 - \$40,400	6,820	\$3,360	\$22.9	\$1.6	4%	
\$40,400 - \$67,700	8,290	\$4,420	\$36.6	\$3.1	7%	
\$67,700 - \$117,800	12,730	\$6,100	\$77.7	\$6.7	16%	
Above \$117,800	28,350	\$10,970	\$311.0	\$29.2	71%	
All Full-Year Filers	62,910	\$7,510	\$472.2	\$40.9	100%	
Part-Year and Nonresident Filers	17,740	\$1,710	\$30.4	\$2.5		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

See Deduction for Health Insurance Premiums and Long-Term Care Insurance Premiums by the Self-Employed, Assessment, p. 958 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.104 HEALTH SAVINGS ACCOUNTS

Internal Revenue Code Section: 223

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 2003

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$92,000,000	\$92,000,000
2025-27	Not Applicable	\$110,000,000	\$110,000,000

DESCRIPTION

Contributions to health savings accounts (HSAs) by qualified individuals, or by a qualified individual's employer on behalf of the employee, are deductible from federal gross income. The deduction can be taken without itemizing (known as an adjustment or above-the-line deduction). Withdrawals from HSAs are exempt from income taxes if used for qualified medical expenses. HSA account earnings are tax-exempt and unused balances may accumulate without limit. The revenue loss numbers provided above include the losses related to both the adjustment and exclusion connected to HSAs.

The accounts are used to pay medical costs incurred until an insurance deductible amount is met. To qualify for 2023, individuals must have high deductible (at least \$1,500 for individual coverage and \$3,000 for families) health insurance and generally have no other health care coverage. Contributions are limited to \$3,850 for individual coverage and \$7,750 for a family. The deductible amounts and contribution limits are adjusted annually for inflation. Individuals who are 55 or older and not yet covered by Medicare may contribute an additional \$1,000 each year.

PURPOSE

"HSAs are a tax-advantaged account designed to help people save and pay for unreimbursed medical expenses such as health insurance cost sharing (e.g., deductibles, copayments, and co-insurance) and services not covered by insurance ... HSAs in concert with HDHPs [high-deductible health insurance plans] allow individuals to save for routine and other medical costs while insuring against large or catastrophic medical expenses. Properly designed, they may encourage more cost-conscious health care use and the accumulation of funds for medical care ... HDHPs and HSAs have also been touted as a way to lower overall health care costs, as consumers are incentivized to find out what health care providers charge and be willing to switch to lower-cost providers or forgo a doctor's visit for what they may consider a minor ailment." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

Taxpayers who use health savings accounts.

EVALUATION

See Health Savings Accounts, *Assessment*, p. 912 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.105 IRA CONTRIBUTIONS AND EARNINGS

Internal Revenue Code Section: 219, 408, and 408A

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1974

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$220,000,000	\$220,000,000
2025-27	Not Applicable	\$280,000,000	\$280,000,000

DESCRIPTION

There are two types of Individual Retirement Accounts (IRAs) from which taxpayers may receive a tax benefit: Traditional and Roth. The Traditional IRA allows for tax deductible contributions, while the Roth IRA allows for tax-free withdrawals. The revenue impact consists of the tax benefits from the deductibility of traditional IRAs, the tax-deferred earnings of traditional IRAs, and the tax-free earnings of Roth IRAs. This deduction can be taken without itemizing (known as an adjustment or above-the-line deduction).

The federal Joint Committee on Taxation lists the two account types as separate tax expenditures, but their estimated impact is combined here.

The Coronavirus Aid, Relief, and Economic Security (CARES) Act of 2020 made a temporary waiver of the minimum distribution requirement of certain employer-provided qualified retirement plans and IRAs for calendar year 2020. This waiver could change the timing of when taxpayers make withdrawals, hence affecting the earnings. The exact effect on the revenue impact is uncertain, however it is thought to be relatively small.

PURPOSE

To provide an incentive for taxpayers to save for retirement, education, and homeownership, and to provide a savings incentive for workers who do not have employer provided pension plans.

WHO BENEFITS

Taxpayers who contribute to eligible IRAs or have earnings within an eligible IRA.

EVALUATION

See Assessments for tax expenditures related to IRA contributions and earnings, p. 1073 and 1079 [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.106 MOVING EXPENSES

Internal Revenue Code Section: 217

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None (TCJA provisions are temporary, see description)

Year Enacted: 1964

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$100,000	\$100,000
2025-27	Not Applicable	\$3,500,000	\$3,500,000

DESCRIPTION

Active-duty members of the military incurring moving expenses related to being stationed in a new location are allowed an adjustment to personal taxable income for qualified moving expenses. The Tax Cuts and Jobs Act of 2017 suspended this provision for tax years 2018 through 2025 for non-military taxpayers.

This deduction is taken without itemizing (known as an adjustment or an above-the-line deduction). The expenses include costs of moving household goods and traveling expenses while moving.

The federal Joint Committee on Taxation does not consider this adjustment to be a tax expenditure, presumably because the costs associated with seeking income (e.g. a job) would be deductible under their “normal tax structure.”

PURPOSE

To reduce employment-related moving costs for active-duty members of the military.

WHO BENEFITS

Active-duty members of the military incurring moving expenses related to being stationed in a new location. The number of taxpayers claiming this adjustment in 2022 was about 700 and the average savings in Oregon tax from this provision was \$80.

EVALUATION

Not evaluated.

1.107 OVERNIGHT TRAVEL EXPENSES OF NATIONAL GUARD AND RESERVE MEMBERS

Internal Revenue Code Section: 162(p) and 62(a)(2)(E)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 2003

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$2,000,000	\$2,000,000
2025-27	Not Applicable	\$2,000,000	\$2,000,000

DESCRIPTION

A deduction is allowed for all unreimbursed overnight travel, meals, and lodging expenses of National Guard and Reserve members. This deduction can be taken without itemizing (known as an adjustment or above-the-line deduction). To qualify, recipients must have traveled more than 100 miles away from home and stayed overnight as part of an activity while on official duty. No deduction is permitted for commuting expenses to and from drill meetings, and the amount of expenses may not exceed the general federal government per diem rate applicable to that locale.

PURPOSE

To offer a partial reimbursement to National Guard and Reserve members for unreimbursed overnight travel expenses incurred in the line of duty.

WHO BENEFITS

Members of the National Guard and Reserve.

EVALUATION

See Deduction for Overnight-Travel Expenses of National Guard and Reserve Members, *Assessment*, p. 16 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.201 MEDICAL AND DENTAL EXPENSES

Internal Revenue Code Section: 213

Oregon Statute: 316.695 (Connection to federal personal deductions)

Sunset Date: None

Year Enacted: 1942

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$255,000,000	\$255,000,000
2025-27	Not Applicable	\$288,000,000	\$288,000,000

DESCRIPTION

Most medical expenses paid for by an individual but not reimbursed by an employer or insurance company are deductible from taxable income to the extent they exceed 7.5 percent of adjusted gross income (AGI) for the taxpayer. The Disaster Tax Relief Act of 2020 made the 7.5 percent of AGI floor permanent. The deduction includes amounts paid for such things as:

- Health insurance premiums
- Diagnosis, treatment, mitigation, or prevention of disease
- Prescription drugs and insulin (not over-the-counter medication)
- Transportation for and/or essential to medical care
- Long-term care insurance premiums up to an age-based annual limit. For 2023 the limit ranges from \$480 for taxpayers 40 or younger, up to \$5,960 for taxpayers over 70.

See also [1.304, Medical Subtraction for Elderly](#), which provides a description of Oregon’s provision allowing certain qualified taxpayers to subtract medical and dental expenses.

PURPOSE

“For individual taxpayers who itemize, the deduction can ease the financial burden imposed by costly medical expenses. The federal tax code, in part, regards these expenses as involuntary expenses that reduce a taxpayer’s ability to pay taxes by absorbing a substantial part of income” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*)

WHO BENEFITS

In 2022, approximately 254,000 Oregon taxpayers claimed on average a deduction for medical expenses of \$8,700, which resulted in a savings of \$510 in Oregon tax. The table below shows the use of this deduction for 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Deduction	Average Deduction	Total Deducted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	56,400	\$7,280	\$410.7	\$4.6	4%
\$19,400 - \$40,400	46,600	\$7,660	\$357.1	\$16.1	13%
\$40,400 - \$67,700	45,700	\$8,600	\$393.1	\$25.4	20%
\$67,700 - \$117,800	54,600	\$9,620	\$525.5	\$40.0	32%
Above \$117,800	32,300	\$13,940	\$450.3	\$38.6	31%
All Full-Year Filers	235,600	\$9,070	\$2,136.7	\$124.7	100%
Part-Year and Nonresident Filers	18,800	\$4,120	\$77.5	\$4.5	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

See Deduction for Medical Expenses and Long-Term Care Expenses, *Assessment*, p. 924 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.202 REMOVAL OF ARCHITECTURAL BARRIERS

Internal Revenue Code Section: 190

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1976

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$500,000	Less than \$500,000	Less than \$500,000
2025-27	Less than \$500,000	Less than \$500,000	Less than \$500,000

DESCRIPTION

A deduction from corporation or personal taxable income of up to \$15,000 is allowed for the removal of architectural and transportation barriers. This limit is not adjusted for inflation. Eligible expenses include those necessary to make facilities or transportation vehicles, for use in trade or business, more accessible to the disabled and people 65 and over.

PURPOSE

To reduce physical barriers for employees and customers who are disabled or age 65 and over.

WHO BENEFITS

The taxpayers incurring eligible costs of making the structural changes.

EVALUATION

See Expensing of Costs to Remove Architectural and Transportation Barriers to the Handicapped and Elderly, *Assessment*, p. 569 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.203 DEDUCTION OF CERTAIN FILM AND TELEVISION PRODUCTION COSTS

Internal Revenue Code Section: 181

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable incomes)

Sunset Date: 12-31-2025

Year Enacted: 2004

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$500,000	Less than \$500,000	\$500,000
2025-27	Less than \$500,000	Less than \$500,000	Less than \$500,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

The cost of producing films and television programs is usually depreciated over a period of time using the income forecast method (which allows deductions based on the pattern of expected earnings). This federal tax provision allows production costs to be deducted when incurred. Eligible productions are restricted to those with a cost of \$15 million or less (\$20 million if produced in certain designated low-income areas) and in which at least 75 percent of the compensation is for services performed in the United States. Only the first 44 episodes of a television series qualify, and sexually explicit productions are not eligible.

This provision was enacted temporarily in 2004 and has been extended several times. The Taxpayer Certainty and Disaster Tax Relief Act of 2020 extended it through tax year 2025.

PURPOSE

To encourage film production in the United States.

WHO BENEFITS

Taxpayers with eligible film and television production costs.

EVALUATION

Not evaluated.

1.204 ACCELERATED DEPRECIATION OF CERTAIN BUILDINGS

Internal Revenue Code Section: 167 and 168

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None (TCJA and other provisions are temporary, see description).

Year Enacted: 1954

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$2,500,000	\$2,500,000	\$5,000,000
2025-27	\$2,500,000	\$2,000,000	\$4,500,000

DESCRIPTION

In general, taxpayers may deduct from corporation and personal taxable income the depreciation of buildings based on a straight-line method where equal amounts are deducted in each period. This tax expenditure permits the use of accelerated depreciation methods for most buildings, which allow for faster write-offs than the straight-line method. The revenue impact of this tax expenditure represents the additional tax that would have been paid if straight-line depreciation had been used. Note: The tax expenditure associated with rental housing is covered separately in [1.209, Accelerated Depreciation of Rental Housing](#).

The Tax Cuts and Jobs Act of 2017 (TCJA) made several changes to depreciation allowances. In terms of the estimated revenue impact, the extension of “bonus depreciation” was the most substantive. Bonus depreciation generally allows additional depreciation of an asset’s cost in the first year it is in service. If an asset is acquired and placed in service between September 27, 2017 and December 31, 2022, the changes allow 100 percent expensing. For assets placed in service at later dates, the percentage declines by 20 points per year. Consequently, the bonus depreciation rate is 80 percent in 2023, and completely phased out beginning in 2026. The referenced end dates are increased by one year for longer production-period property with longer lives. TCJA also expanded the applicability of bonus depreciation to used buildings.

Accelerated depreciation of any type of capital does not change the cumulative amount of depreciation over all years. Therefore, this provision allows a taxpayer to deduct more in the first year of the investment and subsequently less in the later years of the capital life cycle resulting in a potential net increase in tax revenue from this provision in the years following accelerated depreciation of the building(s) (reported as a negative revenue impact).

PURPOSE

“Accelerated depreciation provides a tax incentive to the extent it is faster than economic (i.e., actual) depreciation.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022). Presumably, this could promote investment in buildings.

WHO BENEFITS

This expenditure benefits owners of buildings used in a trade or business.

EVALUATION

See Depreciation of Buildings Other Than Rental Housing in Excess of Alternative Depreciation System, *Assessment*, p. 352 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.205 ACCELERATED DEPRECIATION OF EQUIPMENT

Internal Revenue Code Section: 167 and 168

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None (TCJA and other provisions are temporary, see description)

Year Enacted: 1954

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$97,000,000	\$36,000,000	\$133,000,000
2025-27	\$3,500,000	Less than \$500,000	\$3,500,000

DESCRIPTION

In general, taxpayers may deduct from corporation and personal taxable income the depreciation of equipment based on a straight-line method where equal amounts are deducted in each period. This tax expenditure permits the use of accelerated depreciation methods, which allow for faster write-offs than the straight-line method. The tax expenditure is the additional tax that would have been paid if straight-line depreciation had been used.

The Tax Cuts and Jobs Act of 2017 (TCJA) made several changes to depreciation allowances. In terms of the estimated revenue impact, the extension and expansion of “bonus depreciation” was the most substantive. Bonus depreciation generally allows additional depreciation of an asset’s cost in the first year it is in service. If an asset is acquired and placed in service September 27, 2017 through December 31, 2022, the changes allow 100 percent expensing. For assets placed in service at later dates, the percent declines by 20 points per year. Consequently, the bonus depreciation rate is 80 percent in 2023, and completely phased out after 2026. The referenced end dates are increased by one year for some production property with longer lives. TCJA also expanded applicability of bonus depreciation provisions to used equipment.

Accelerated depreciation of any type of capital does not change the cumulative amount of depreciation over all years. Therefore, this provision allows a taxpayer to deduct more in the first year of the investment and subsequently less in the latter years of the capital life cycle resulting in a potential net increase in tax revenue from this provision in the years following accelerated depreciation of the equipment (reported as a negative revenue impact).

This tax expenditure includes the following components listed separately by the federal Joint Committee on Taxation:

- Depreciation of equipment in excess of the alternative depreciation system.
- Five-year Modified Accelerated Cost Recovery System (MACRS) for certain energy property (solar, wind, etc.)
- 10-year MACRS for smart electric distribution property.
- 15-year MACRS for certain electric transmission property.
- 15-year MACRS for natural gas distribution line.
- 15-year straight-line cost recovery for qualified leasehold improvements, qualified restaurant improvements, and qualified retail improvements. (TCJA included language that leaves the status of these properties uncertain.)

PURPOSE

“This [provision] represents a tax expenditure because the depreciation methods are faster than economic (i.e., actual) depreciation. Existing evidence indicates that the economic decline rate for equipment is much slower than that reflected in tax depreciation methods” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022*). Presumably, this could promote investment in business equipment.

WHO BENEFITS

Owners of equipment used in a trade or business.

EVALUATION

See Depreciation on Equipment in Excess of Alternative Depreciation System, Assessment, p. 485 and Depreciation Recovery Periods for Energy-Specific Items, Assessment, p. 109 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.206 SECTION 179 EXPENSING ALLOWANCES

Internal Revenue Code Section: 179

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1958

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$7,000,000	\$38,000,000	\$45,000,000
2025-27	\$8,000,000	\$39,000,000	\$47,000,000

DESCRIPTION

In general, the cost of business property must be deducted from personal and corporation income as it depreciates over its useful life. Subject to specific limits, Section 179 allows a taxpayer to elect to take an immediate deduction for qualifying property.

For tax year 2023, the maximum for a Section 179 immediate deduction is \$1.16 million for property placed in service in 2018 or later. The deduction is phased out for total expenditures exceeding \$2.89 million. These limits are adjusted for inflation.

The Tax Cuts and Jobs Act of 2017 increased the allowed immediate deduction from \$500,000 to \$1 million and the amount for total expenditures where the deduction is phased out from \$2 million to \$2.5 million.

Immediate expensing of any type of property for tax purposes is in lieu of depreciating the property over a number of years and does not change the cumulative amount of depreciation over all years. Therefore, this provision allows a taxpayer to deduct more in the first year of the investment and subsequently less in the later years of the capital life cycle resulting in a potential net increase in tax from this provision (reported as a negative revenue impact).

PURPOSE

When initially enacted, Section 179 expensing "...was intended to reduce the tax burden on small firms, give them an incentive to invest more, and simplify their tax accounting." (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Businesses with qualified property purchases.

EVALUATION

See Expensing Under Section 179 of Depreciable Business Property, Assessment, p. 493 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.207 AMORTIZATION OF BUSINESS START-UP COSTS

Internal Revenue Code Section: 195

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1980

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$500,000	\$1,000,000	\$1,000,000
2025-27	Less than \$500,000	\$1,500,000	\$1,500,000

DESCRIPTION

This provision allows a taxpayer to deduct from personal or corporation taxable income eligible start-up expenditures incurred prior to the day the business starts. A deduction of these expenditures as a current expense is available up to \$10,000 and any remaining amount is amortized over 15 years. The expense limit is reduced dollar for dollar when start-up expenses exceed \$60,000. Thus, no deduction as a current expense is available if start-up expenditures are \$70,000 or greater. Start-up expenditures must satisfy two requirements to qualify for this treatment. First, they must be paid in connection with creating or investigating a trade or business before the taxpayer begins an active business. Second, they must be an expenditure that would have been deductible for an active business.

PURPOSE

To encourage the formation of new businesses and to clarify the tax treatment of start-up expenditures.

WHO BENEFITS

New businesses that incur start-up costs.

EVALUATION

See Amortization of Business Startup Costs, *Assessment*, p. 500 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.208 FOREIGN-DERIVED INTANGIBLE INCOME

Internal Revenue Code Section: 250

Oregon Statute: 317.013 (Connection to federal corporation taxable income)

Sunset Date: None (deduction reduced after 12-31-2025, see description)

Year Enacted: 2017

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$120,000,000	Not Applicable	\$120,000,000
2025-27	\$110,000,000	Not Applicable	\$110,000,000

DESCRIPTION

Corporations deduct 37.5 percent of “foreign-derived intangible income” from their federal taxable income for tax years 2018 through 2025. The deduction is reduced to 21.875 percent starting in tax year 2026.

The concept of “foreign-derived intangible income” (FDII) is complex and defined in the Tax Cuts and Jobs Act of 2017 (TCJA). In brief summary, FDII is U.S. profits on sales of exported property or services that exceed 10 percent of the corporation’s investment.

The deduction for FDII works in conjunction with provisions for Global Intangible Low Taxed Income (GILTI). The subsidy provided by FDII is supplemented by GILTI, which taxes certain international income that would otherwise be excluded from tax. The GILTI inclusion is based on profits exceeding 10 percent of the corporation’s investment in countries outside the United States.

For a brief discussion on the changes to tax on corporations' international earnings due to TCJA see the introduction to Chapter 1, Income Tax (Personal and Corporation).

PURPOSE

Presumably, to encourage locating intangible assets in the United States.

WHO BENEFITS

Domestic corporations that export goods or services.

EVALUATION

See Deduction for Foreign-Derived Intangible Income Derived from Trade or Business within the United States, *Assessment*, p. 63 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.209 ACCELERATED DEPRECIATION OF RENTAL HOUSING

Internal Revenue Code Section: 168(c)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1954

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$6,000,000	\$31,000,000	\$37,000,000
2025-27	\$5,000,000	\$22,000,000	\$27,000,000

DESCRIPTION

In general, taxpayers may deduct from corporation and personal taxable income the depreciation of rental housing based on a straight-line method where equal amounts are deducted in each period over 27.5 years.

This tax expenditure measures the revenue loss due to deductions in excess of those allowed under a 40-year straight-line depreciation method permitted by the Alternative Minimum Tax. Rental housing properties placed in service before 1986 continue depreciation according to the method they started with, which may allow the property to depreciate faster than under a straight-line method.

PURPOSE

To promote investment in rental housing by effectively deferring taxes paid on those investments.

WHO BENEFITS

Owners of rental housing.

EVALUATION

See Depreciation of Rental Housing in Excess of Alternative Depreciation System, *Assessment*, p. 412 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.210 HOME MORTGAGE INTEREST

Internal Revenue Code Section: 163(h)

Oregon Statute: 316.695 (Connection to federal personal deductions)

Sunset Date: None (TCJA provisions are temporary, see description)

Year Enacted: 1913

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$962,000,000	\$962,000,000
2025-27	Not Applicable	\$1,010,000,000	\$1,010,000,000

DESCRIPTION

Mortgage interest paid by owner-occupants on their primary and secondary residences is deductible from personal taxable income for taxpayers who itemize deductions. The current law allows this deduction for debt incurred after December 15, 2017 up to \$750,000 (\$375,000 if married filing separately) for a home purchase and does not allow the deduction of interest on home equity loans unless the proceeds are used for constructing or significantly improving the taxpayer's residence.

These temporary limits of the deduction set by Tax Cuts and Jobs Act of 2017 will revert to the previous limits for debts after December 31, 2025, allowing the deduction of the interest on loans up to \$1 million (\$500,000 if married filing separately) for the purchase of the residence. Deductions will also be allowed on home equity loans up to \$100,000 (\$50,000 if married filing separately).

PURPOSE

According to the Congressional Research Service, no rationale was provided when this provision was originally enacted in 1913. Originally, when this provision was enacted, the deduction made no distinction between interest payments made for business, personal, living, or family expenses and there is no evidence in the legislative history that the interest deduction was intended to encourage home ownership or to stimulate the housing industry at that time. However, the Congressional Research Service also notes that major justifications for the mortgage interest deduction have been stated as the desire to encourage homeownership and to stimulate residential construction.

WHO BENEFITS

In 2022, approximately 687,800 Oregon taxpayers claimed on average, a deduction for home mortgage interest paid of \$7,670, which resulted in a savings of \$640 in Oregon tax. The table below shows the use of this deduction for 2022.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Deduction	Average Deduction	Total Deducted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	31,800	\$6,040	\$192.0	\$1.9	<1%	
\$19,400 - \$40,400	42,300	\$6,100	\$258.0	\$15.8	4%	
\$40,400 - \$67,700	85,800	\$6,680	\$573.0	\$47.1	11%	
\$67,700 - \$117,800	172,800	\$7,660	\$1,322.8	\$114.1	28%	
Above \$117,800	252,300	\$10,250	\$2,586.8	\$235.4	57%	
All Full-Year Filers	584,900	\$8,430	\$4,932.6	\$414.4	100%	
Part-Year and Nonresident Filers	102,900	\$3,340	\$343.6	\$25.9		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

See Deduction for Mortgage Interest on Owner-Occupied Residences, *Assessment*, p. 386 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.211 PROPERTY TAXES

Internal Revenue Code Section: 164

Oregon Statute: 316.695 (Connection to federal personal deductions)

Sunset Date: None (TCJA provisions are temporary, see description)

Year Enacted: 1913

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$587,000,000	\$587,000,000
2025-27	Not Applicable	\$656,000,000	\$656,000,000

DESCRIPTION

Property taxes on nonbusiness property paid to state or local governments for services or benefits for the general public welfare are deductible from personal taxable income for taxpayers who itemize deductions. The taxes must be based on the value of the property and be charged uniformly across all property in the jurisdiction of the governing entity.

The Tax Cuts and Jobs Act of 2017 (TCJA) temporarily limits this deduction. For federal tax purposes, there is a limit of \$10,000 total for the deduction for property tax combined with the deduction for state and local income tax. Because Oregon does not allow a deduction for state income tax, and, for most taxpayers, the local income tax deduction is very small, taxpayers who itemize Oregon deductions will generally have the \$10,000 limit apply to their Oregon itemized deduction for property tax alone. This limit is in place for tax years 2018 through 2025.

PURPOSE

“Deductibility of state and local taxes was adopted in 1913 to avoid taxing income that was obligated to expenditures over which the taxpayer had little or no discretionary control.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

In 2022, approximately 865,000 Oregon taxpayers claimed on average a deduction for property taxes of \$4,150, which resulted in a savings of \$336 in Oregon tax. The table below shows the use of this deduction for 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Deduction	Average Deduction	Total Deducted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	56,700	\$3,600	\$204.1	\$2.6	<1%
\$19,400 - \$40,400	64,900	\$3,590	\$233.2	\$13.4	5%
\$40,400 - \$67,700	110,400	\$3,630	\$400.9	\$31.9	11%
\$67,700 - \$117,800	208,900	\$4,150	\$867.2	\$74.1	27%
Above \$117,800	301,800	\$5,710	\$1,724.7	\$156.7	56%
All Full-Year Filers	742,700	\$4,620	\$3,430.0	\$278.8	100%
Part-Year and Nonresident Filers	121,900	\$1,300	\$158.0	\$12.0	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

See Deduction of Nonbusiness State and Local Government Taxes, *Assessment*, p. 1140 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.212 SOIL AND WATER CONSERVATION EXPENDITURES

Internal Revenue Code Section: 175

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1954

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$500,000	\$500,000	\$500,000
2025-27	Less than \$500,000	\$500,000	\$500,000

DESCRIPTION

For corporation and personal income tax purposes, certain investments in soil and water conservation projects that produce benefits over a number of years can be expensed rather than depreciated. The expensing of these costs represents a departure from the typical practice of depreciating improvements and represents a tax expenditure because deductions can be claimed before the income associated with the deductions is realized.

PURPOSE

To promote soil and water conservation and to reduce the tax burden on farmers.

WHO BENEFITS

Farmers who engage in projects that conserve soil and water. In many cases these improvements are made to land or water areas that may not provide any return on investment to the farmer.

EVALUATION

See Expensing of Soil and Water Conservation Expenditures, *Assessment*, p. 318 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.213 FERTILIZER AND SOIL CONDITIONER COSTS

Internal Revenue Code Section: 180 and 464 (Reg. S1.180-1 and S1.180-2)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1960

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$500,000	\$500,000	\$500,000
2025-27	Less than \$500,000	\$500,000	\$500,000

DESCRIPTION

For corporation and personal income tax purposes, certain investments in soil fertilization and conditioning projects that produce benefits over a number of years can be expensed rather than depreciated. The expensing of these costs represents a departure from typical practice and represents a tax expenditure because deductions can be claimed before the income associated with the deductions is realized.

PURPOSE

To promote activities that maintain and improve the fertility of the soil.

WHO BENEFITS

Farmers who invest in projects to fertilize and condition their soil.

EVALUATION

See Expensing by Farmers for Fertilizer and Soil Conditioner Costs, *Assessment*, p. 336 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.214 EXTENDED CARRYBACK OF FARMING LOSS

Internal Revenue Code Section: 172(b)(1)(B)

Oregon Statute: 316.048 (Connection to federal personal taxable income)

Sunset Date: None

Year Enacted: 1999

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$500,000	\$500,000
2025-27	Not Applicable	\$500,000	\$500,000

DESCRIPTION

This tax expenditure is an exception to a general limit imposed on loss carrybacks. When an individual taxpayer has a net operating loss (business expenses exceed gross income), the taxpayer generally may not elect to subtract the loss

amount from income that was taxed in previous years. This provision allows farming losses to be carried back up to two years.

The Tax Cuts and Jobs Act of 2017 modified this provision for losses incurred for tax years ending after 2017. Net operating loss was previously allowed up to two years for most individual taxpayers, and up to five years for farming.

For a related Oregon provision, see [1.321, Agriculture Sector Net Operating Loss Carryback](#).

PURPOSE

According to the Congressional Research Service, congressional committee reports indicated that an extension of time to carry back losses was considered appropriate for the farm industry because of the volatility of farm income.

WHO BENEFITS

Farmers with losses to carry back.

EVALUATION

See Two-Year Carryback Period for Net Operating Losses Attributable to Farming, *Assessment*, p. 339 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.215 INTANGIBLE DEVELOPMENT COSTS FOR FUELS

Internal Revenue Code Section: 263(c), 291, 616, 617, 57(a)(2), 59(e) and 1254

Oregon Statute: 316.695 and 317.013 (Connections to federal personal and corporation deductions)

Sunset Date: None

Year Enacted: 1954

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$3,000,000	Less than \$500,000	\$3,000,000
2025-27	\$2,000,000	Less than \$500,000	\$2,000,000

DESCRIPTION

Intangible drilling and development costs incurred in oil, gas, and geothermal wells may be expensed. Intangible drilling and development costs include amounts paid for fuel, labor, materials, hauling, or repair to drilling equipment. Costs associated with determining the precise location and potential size of a mineral deposit are amortized over two years by independent businesses, and over five years by major oil companies.

Though relatively few oil, gas and geothermal wells exist in Oregon, corporations' income is apportioned to Oregon after these costs are expensed.

This tax expenditure includes the following components listed separately by the federal Joint Committee on Taxation:

- Expensing of Exploration and Development Costs for Oil and Gas.
- Amortization of geological and geophysical expenditures associated with oil and gas exploration.

PURPOSE

To encourage development of petroleum, natural gas, and geothermal wells.

WHO BENEFITS

The owners incurring the specified expenses for qualified activities.

EVALUATION

See Assessments for tax expenditures related to intangible development cost for fuels, p. 127 and 133 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.216 AMORTIZATION OF AIR POLLUTION CONTROL FACILITIES

Internal Revenue Code Section: 169(d)(5)

Oregon Statute: 317.013 (Connection to federal corporation taxable income)

Sunset Date: None

Year Enacted: 2005

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$500,000	Not Applicable	Less than \$500,000
2025-27	Less than \$500,000	Not Applicable	Less than \$500,000

DESCRIPTION

Coal-fired electric generation plants may amortize investments in certified pollution control equipment over shorter periods than the life of the equipment. A pollution control facility placed in service after April 11, 2005 qualifies for a 5-year (for plants placed in service prior to 1976) or 7-year amortization (newer plants) if the useful life of the facility is 15 years or less. The amount available for this amortization is reduced for facilities with useful lives in excess of 15 years.

PURPOSE

“For installations in pre-1976 plants, the five-year amortization of pollution control equipment was added by the Tax Reform Act of 1969 (P.L. 91-172) to compensate for the loss of the investment tax credit, which was repealed by the same act.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Owners of coal-fired electric generation plants who install certified pollution control equipment.

EVALUATION

See Amortization of Air Pollution Control Facilities, *Assessment*, p. 209 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.217 EXPENSING TIMBER-GROWING COSTS

Internal Revenue Code Section: 263A(c)(5)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1986

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$2,500,000	Less than \$500,000	\$2,500,000
2025-27	\$2,500,000	Less than \$500,000	\$2,500,000

DESCRIPTION

Most of the production costs (e.g. disease and pest control, clearing brush, etc.) of growing timber may be expensed rather than capitalized when computing corporation and personal taxable income. Expensing allows full deduction in the year the expenses are incurred, while capitalization requires the deduction to be taken over a number of years. In most other industries, these expenses must be capitalized.

PURPOSE

To provide tax relief to timber growers in recognition of the long growing periods for timber during which no revenue is produced.

WHO BENEFITS

Taxpayers who have timber-growing expenses that are not connected with a timber harvest or reforestation activity.

EVALUATION

See Expensing of Timber-Growing Costs, Assessment, p. 284 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.218 EXPENSING AND AMORTIZATION OF REFORESTATION COSTS

Internal Revenue Code Section: 194 and 263A(c)(5)

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1980

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$500,000	\$500,000	\$500,000
2025-27	Less than \$500,000	\$500,000	\$500,000

DESCRIPTION

Qualified reforestation costs can be expensed up to \$10,000 annually with the remainder amortized (deducted) over seven years. Costs that qualify for amortization are those for site preparation, seed or seedlings, labor, and tools. The limitation on expensing is for each qualifying property.

Without this provision, reforestation costs would be capitalized into the property's cost basis and deducted when sold.

Reforestation costs do not include any costs for which the taxpayer has been reimbursed under any governmental reforestation cost-sharing program unless the amounts reimbursed have been included in the gross income of the taxpayer.

PURPOSE

To lower the annual after-tax cost of reforestation.

WHO BENEFITS

Business taxpayers who are reforesting forest lands.

EVALUATION

See Amortization and Expensing of Reforestation Expenses, Assessment, p. 306 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.219 MAGAZINE CIRCULATION EXPENDITURES

Internal Revenue Code Section: 173

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1950

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$500,000	Less than \$500,000	Less than \$500,000
2025-27	Less than \$500,000	Less than \$500,000	Less than \$500,000

DESCRIPTION

This provision allows publishers of periodicals to deduct expenditures to establish, maintain, or increase circulation in the year that the expenditures are made. The revenue impact of this tax expenditure is the difference between the current deduction of costs and the recovery that would have been allowed if these expenses were capitalized and deducted over time.

PURPOSE

To reduce the cost of tax compliance.

WHO BENEFITS

Publishers of periodicals.

EVALUATION

See Expensing of Magazine Circulation Expenditures, *Assessment*, p. 508 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.220 COMPLETED CONTRACT RULES

Internal Revenue Code Section: 460

Oregon Statute: 316.048 and 317.013 (Connections to federal personal and corporation taxable income)

Sunset Date: None

Year Enacted: 1986

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$7,000,000	\$500,000	\$7,500,000
2025-27	\$7,500,000	\$1,000,000	\$8,500,000

DESCRIPTION

Some taxpayers with construction or manufacturing contracts extending for more than one tax year are allowed to use the completed contract method of accounting. Under this method, income and costs pertaining to the contract are reported when the contract is completed; however, some indirect costs may be deducted from corporation and personal taxable income in the year paid or incurred. This mismatching of income and expenses results in a deferral of tax payments.

This provision is restricted to apply mostly to long-term home construction contracts. Other real estate construction contracts may qualify if the gross receipts of the contractor are \$25 million or less and the contract is estimated to be completed within two years.

PURPOSE

This tax reporting method was allowed because these contracts may involve “so many uncertainties that profit or loss was undeterminable until the contract was completed.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Residential construction contractors are the main beneficiaries.

EVALUATION

See Completed Contract Rules, *Assessment*, p. 517 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.221 CHARITABLE CONTRIBUTIONS

Internal Revenue Code Section: 170 and 642(c)

Oregon Statute: 316.695 and 317.013 (Connections to federal personal and corporation deductions)

Sunset Date: None (TCJA expansions are temporary, see description)

Year Enacted: 1917 and 1935 (personal and corporation)

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$38,000,000	\$505,000,000	\$543,000,000
2025-27	\$50,000,000	\$555,000,000	\$605,000,000

DESCRIPTION

Contributions to charitable, educational, health, religious, and certain other nonprofit organizations are allowed as itemized deductions from personal taxable income of amounts up to 60 percent of adjusted gross income. Corporations can deduct from corporate taxable income contributions up to 10 percent of adjusted taxable income. Taxpayers who donate property may deduct the current market value of the property up to 30 percent of adjusted gross income and do not need to pay tax on any capital gains realized on the property. Contributions in excess of the limits may be applied up to five future tax years until the contributions are completely deducted.

Due to the passage of HB 2060 in 2013, an Oregon deduction is not allowed for contributions to a charitable organization that does not spend at least 30 percent of its total annual functional expenses on program services. Affected organizations are required to notify donors in writing that donations are not deductible for Oregon tax purposes.

The Tax Cuts and Jobs Act of 2017 (TCJA) temporarily increased the previous 50 percent of adjusted gross income limit for charitable cash donations to the current 60 percent limit. This limit is in effect from tax years 2018 through 2025. In addition, TCJA repealed the portion of the deduction that had been allowed to taxpayers who made donations to colleges in exchange for the right to purchase tickets to athletic events. That portion of the deduction is disallowed for tax years after 2017.

PURPOSE

“The deduction for charitable contributions reduces the net cost of contributing.” (Congressional Research Service, Tax Expenditures: Compendium of Background Material on Individual Provisions: 2022) Presumably, the purpose is to encourage donations to designated charitable organizations.

WHO BENEFITS

In 2022, approximately 608,000 Oregon personal income tax taxpayers claimed a deduction for donations to charitable organizations on their Oregon Schedule OR-A. The average deduction of about \$4,930 by those taxpayers resulted in an average tax savings of \$430. See the table below for details on the use of the deduction by income level.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Deduction	Average Deduction	Total Deducted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	35,000	\$1,620	\$56.7	\$0.9	<1%	
\$19,400 - \$40,400	47,100	\$2,420	\$114.0	\$5.7	2%	
\$40,400 - \$67,700	73,300	\$2,680	\$196.7	\$14.6	6%	
\$67,700 - \$117,800	142,800	\$3,210	\$459.1	\$38.3	16%	
Above \$117,800	232,500	\$8,380	\$1,947.8	\$182.9	75%	
All Full-Year Filers	530,700	\$5,230	\$2,774.3	\$242.4	100%	
Part-Year and Nonresident Filers	77,400	\$2,860	\$221.5	\$19.1		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

According to the federal Joint Committee on Taxation, of the total amount deducted for personal income taxpayers for federal fiscal year 2023, 13 percent was for donations to educational organizations, 10 percent for donations to health organizations, and 77 percent for donations to other charitable organizations. Of the total amount deducted for

corporate income taxpayers, 23 percent was for donations to educational organizations, 27 percent for donations to health organizations, and 50 percent for donations to other charitable organizations.

EVALUATION

See Assessments for Charitable Contribution related tax expenditures for Education, Health and Other, p. 755, 938, and 881 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.222 CASUALTY AND THEFT LOSSES

Internal Revenue Code Section: 165(c)(3), 165(e) and 165(h)-165(k)

Oregon Statute: 316.695 (Connection to federal personal deductions)

Sunset Date: None (TCJA provisions are temporary, see description)

Year Enacted: 1913

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$400,000	\$400,000
2025-27	Not Applicable	\$2,200,000	\$2,200,000

DESCRIPTION

Taxpayers who itemize deductions may deduct from personal taxable income nonbusiness casualty and theft losses that are not reimbursed through insurance. For tax years 2018 through 2025, taxpayers can only claim this deduction if the losses were associated with a federally declared disaster. Taxpayers may deduct only losses of more than \$100 each, but only to the extent that the total of such losses exceed 10 percent of adjusted gross income (AGI).

The limitation related to losses associated with a federally declared disaster, which was set by the Tax Cuts and Jobs Act of 2017 (TCJA), becomes no longer in effect after tax year 2025. For tax years beginning 2026, eligible losses will include losses arising from fire, storm, shipwreck, or other casualty, or from theft. The cause of the loss should be considered a sudden, unexpected, and unusual event.

PURPOSE

According to the Congressional Research Service, no rationale was provided when this provision was originally enacted in 1913. However, it stated “The deduction was intended to be for extraordinary, nonrecurring losses which go beyond the average or usual losses incurred by most taxpayers in day-to-day living”. (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

About 80 taxpayers claimed a deduction for losses incurred in federally declared disasters in 2022.

EVALUATION

See Deduction for Casualty and Theft Losses, *Assessment*, p. 1039 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

1.223 LOCAL INCOME TAXES

Internal Revenue Code Section: 164

Oregon Statute: 316.695 (Connection to federal personal deductions)

Sunset Date: None

Year Enacted: 1913

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$8,700,000	\$8,700,000
2025-27	Not Applicable	\$26,100,000	\$26,100,000

DESCRIPTION

Income taxes paid to cities and other local governments are deductible from personal taxable income for taxpayers who itemize deductions for state income tax.

For individual taxpayers, the Arts Tax imposed by the City of Portland, the Multnomah County Preschool for All Income Tax, and the Portland Metro Supportive Housing Services Income Tax qualify for this deduction.

For business taxpayers, while local taxes are deductible, it is considered a normal business cost and is not reported as an Oregon tax expenditure.

The Tax Cuts and Jobs Act of 2017 temporarily limits this deduction for individuals but not businesses. For federal tax purposes, there is a limit of \$10,000 total for the deduction for property tax combined with the deduction for state and local income tax. The limit may reduce the impact of this Oregon itemized deduction for individuals. This limit is in place for tax years 2018 through 2025.

PURPOSE

“Deductibility of state and local taxes was adopted in 1913 to avoid taxing income that was obligated to expenditures over which the taxpayer had little or no discretionary control.” (Congressional Research Service, *Tax Expenditures: Compendium of Background Material on Individual Provisions*: 2022)

WHO BENEFITS

Taxpayers who pay income taxes to local governments.

EVALUATION

See Deduction of Nonbusiness State and Local Government Taxes, *Assessment*, p. 1140 in [Tax Expenditures: Compendium of Background Material on Individual Provisions](#), 2022.

OTHER FEDERAL PROVISIONS (UNQUANTIFIED OR DISCONNECTED)

Tax Expenditures listed by federal Joint Committee on Taxation as “Quantitatively *de minimis*”

These are tax expenditures that flow through to Oregon through the connection to federal taxable income, but JCT has estimated that their impact is lower than \$250 million in federal tax for federal fiscal years 2023 through 2027. It is important to note that, in previous reports, the JCT used a lower threshold of \$50 million. As a result, the following list has expanded.

- Miscellaneous nonresident individual income tax exclusions (certain gambling winnings, ship or aircraft operation income, certain exchange or training programs compensation, bond income of residents of the Ryukyu Islands, certain wagering income) (IRC 871(j), 872(b))
- Miscellaneous foreign corporate income tax exclusions (ship or aircraft operation income, foreign railroad rolling stock earnings, certain communication satellite earnings (IRC 883))
- Exclusion of interest on state and local qualified private activity bonds for green buildings and sustainable design projects (IRC 142(a)(14))
- Seven-year MACRS for Alaska natural gas pipeline (IRC 168(e)(3)(C))
- Energy efficient commercial buildings deduction (IRC 179D)
- Expensing of tertiary injectants (IRC 193)
- Expensing of exploration and development costs, other fuels (IRC 616 and 617)
- Special depreciation allowance for certain reuse and recycling property (IRC 168(m))
- Special rules for mining reclamation reserves (IRC 468)
- Exclusion of earnings of certain environmental settlement funds (IRC 468B(g))
- Expensing of exploration and development costs, nonfuel minerals (IRC 616 and 617)
- Exclusion of cancellation of indebtedness income of farmers (IRC 108(a)(1)(C))
- Exclusion of cost-sharing payments of farmers (IRC 126)
- Cash accounting for agriculture (IRC 446)
- Expensing of costs of raising dairy and breeding cattle (IRC 1231(b)(3))
- Exclusion of investment income from structured settlement arrangements (IRC 72(u)(3)(C) and 130)
- Inclusion of income arising from business indebtedness discharged by the reacquisition of a debt instrument (IRC 108(i))
- Alaska Native Corporation trusts (IRC 139G, 247, and 646)
- Seven-year MACRS for motorsports entertainment complexes (IRC 168(i)(15))
- Special rules for magazine, paperback book, and record returns (IRC 458)
- Inventory methods and valuation: specific identification for homogeneous products (IRC 471)
- Exclusion from unrelated business taxable income (“UBTI”) of certain payments to controlling exempt organizations (IRC 512)
- Bad debt reserves of financial institutions (IRC 585)

- Deferral of gain on sales of property to comply with conflict-of-interest requirements (IRC 1043)
- Exclusion of gain or loss on sale or exchange of brownfield property (IRC 512(b)(19))
- Exclusion of interest on state and local qualified private activity bonds for high-speed intercity rail facilities (IRC 142(a)(11))
- Exclusion of Indian general welfare benefits (IRC 139E)
- Accelerated depreciation for business property on an Indian reservation (IRC 168(j))
- Exclusion of Olympic and Paralympic medals and prizes (IRC 74(d))
- Exclusion of interest on educational savings bonds (IRC 135)
- Exclusion of restitution payments received by victims of the Nazi regime and the victims' heirs and estates (Section 803 of Pub. L. No. 107-16)
- Archer Medical savings accounts (IRC 220)
- Exclusion of survivor annuities paid to families of public safety officers killed in the line of duty (IRC 101(h))
- Exclusion of special benefits for disabled coal miners (IRC 501(c)(21))
- ABLE accounts (IRC 529A)
- Burial expenses for veterans (IRC Section 134 and 38 USC 5301)
- Exclusion of certain amounts received by wrongfully incarcerated individual (IRC 139F)

Tax Expenditures listed by federal Joint Committee on Taxation as “Not Quantifiable”

These are tax expenditures that flow through to Oregon through the connection to federal taxable income, but JCT has noted that projected revenue changes due to these provisions are not available.

- Deduction for US employment tax paid under section 3121(l) agreements for employees of foreign affiliates
- Accelerated deductions for nuclear decommissioning costs (IRC 468A)
- Fossil fuel capital gains treatment (IRC 631(C))
- Exception to partial interest rule for qualified conservation contribution (IRC 170(h))
- Ten-year MACRS for single purpose agricultural or horticultural structures (IRC 168(e)(3), (i)(13))
- Exceptions from dealer disposition definition for installment sales (IRC 453(1)(2)(A))
- Exceptions from interest calculation on installment sales for small dispositions (IRC 453A(b)(3))
- Unrecaptured section 1250 gain rate, which applies to depreciation taken on real property (IRC 1(h))
- Treatment of loans under life insurance and annuity contracts and 401(k) plans (IRC 72(e), 72(p), and 7702)
- Amortization of organizational expenditures (IRC 248)
- Deferral of prepaid subscription income (IRC 455)
- Deferral of prepaid dues income of certain membership organizations (IRC 456)
- Exemption for cemetery companies (IRC 501(c)(13))
- Certain exceptions to the UBTI rules - passive income gains, income from certain research, trade shows and fairs, bingo games, pole rentals, sponsorship payments, real estate exception to the debt-financed income rules (IRC 512-514)

- Amortization of partnership organization and syndication fees (IRC 709)
- Nonrecognition of in-kind distributions by regulated investment companies in redemption of their stock (IRC 852(b)(6))
- Specific identification of sold equities (IRC 1012 (and Treasury Reg. sect. 1012-1))
- Losses on small business stock (IRC 1242-1244)
- Special discount rate rule for certain debt instruments where stated principal amount is \$2.8 million or less (IRC 1274A)
- Tax treatment of convertible bonds (Treasury Reg. sect. 1.1275-4; Revenue Ruling 2002-31)

Oregon law is not connected to Federal law

These are federal tax expenditures but not Oregon tax expenditures because of specific modifications to federal taxable income in Oregon law.

- Interest expense allocation: Separate grouping of affiliated financial companies (IRC 864). ORS 317.625 disconnects from federal treatment in sections 861 to 864 of IRC.
- Inventory property sales source rules exception (IRC 861, 862, 863, and 865). ORS 317.625 disconnects from federal treatment in sections 861 to 864 of IRC.
- Excess of percentage over cost depletion for Oil and Gas (IRC 611, 612, 613, 613A, and 291). ORS 317.374 disconnects from federal treatment in IRC 611 and requires a "reasonable" Oregon depletion allowance in calculating Oregon taxable income.
- Excess of percentage over cost depletion for Other Fuels (IRC 611, 612, 613, 613A, and 291). ORS 317.374 disconnects from federal treatment in IRC 611 and requires a "reasonable" Oregon depletion allowance in calculating Oregon taxable income.
- Excess of percentage over cost depletion for nonfuel minerals (IRC 611, 612, 613, and 291). ORS 317.374 disconnects from federal treatment in IRC 611 and requires a "reasonable" Oregon depletion allowance in calculating Oregon taxable income.
- Deduction for income attributable to domestic production (QPAI) (IRC 199). ORS 316.836 and 317.398 require that taxpayers add the amount deducted from federal taxable income based on IRC 199 to calculate Oregon taxable income. The Tax Cuts and Jobs Act repealed this provision beginning with tax year 2018.
- Deferral of tax on capital construction funds of shipping companies (IRC 7518). ORS 317.319 requires that taxpayers add the amount deferred to Oregon taxable income.
- Special rules for interest-charge domestic international sales corporations (IRC 991-997). ORS 317.283 does not recognize transactions related to IC-DISCs formed after January 1, 2014. It does impose special treatment for IC-DISCs formed on or before January 1, 2014 (see [1.311, Dividend Received from an IC-DISC](#) in this report).

TAX EXPENDITURES FROM OREGON INCOME TAX PROVISIONS

Oregon has many provisions in its income tax law that reduce tax. Some provisions, known as subtractions, reduce federal taxable income, the starting point for calculating Oregon’s personal and corporate income taxes. Other provisions, known as tax credits, directly reduce the tax. Finally, there are a small number of provisions that reduce tax through other mechanisms, such as reduced tax rates. Not all of these provisions are tax expenditures, as some exist, for example, to prevent double taxation.

Some tax expenditures only affect the personal income tax or corporate income tax, but many apply to both. Some tax expenditures specifically apply to businesses. The structure of a business determines how the income and hence the tax expenditure is reported. For C corporations, tax expenditures are reported on their corporate income tax returns. For sole proprietorships, partnerships, and S corporations, tax expenditures are reported on the business owners’ personal income tax returns.

This report includes 30 Oregon specific subtractions (29 apply to the personal income tax and eight apply to the corporate income tax), 45 Oregon specific credits (43 apply to the personal income tax and 30 apply to the corporate income tax), and eight other provisions that reduce Oregon tax. See [Appendix D on page 395](#) for a list separated by personal and corporate income tax.

Subtractions represent income included in federal taxable income that is not taxed by Oregon and deductions allowed by Oregon that are not included in federal taxable income. An example of the former is a subtraction for certain military related income. An example of the latter is a subtraction for medical expenses for elderly taxpayers beyond the deduction allowed at the federal level.

Tax credits reduce taxpayers’ tax liability on a dollar-for-dollar basis. For a typical tax credit, the tax credit can only reduce the tax liability to zero. For some credits, if there is an excess portion more than the tax liability, that portion is lost and cannot be used. For other credits that additional portion can be carried forward to future tax years. Oregon has a small number of special credits called “refundable” credits where the taxpayer receives a payment for any portion of the credit that is more than the tax liability. Some credits have the feature that the credit may be transferred from one taxpayer to another qualified taxpayer at a specified rate. Typically, a taxpayer will transfer a credit when they do not have the tax liability to use it. To help readers of this report, additional information has been included in the header of each Oregon tax credit to indicate if the credit has a carryforward, is refundable, and is transferable.

A small number of other provisions in Oregon tax law also reduce income tax. These provisions include reduced tax rates for certain types of income, rules that determine how income is apportioned to Oregon for certain companies, and averaging a certain type of income over several years.

1.301 OREGON 529 COLLEGE SAVINGS NETWORK

Oregon Statute: 316.699

Sunset Date: 12-31-2019

Year Enacted: 1999

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,300,000	\$1,300,000
2025-27	Not Applicable	\$0	\$0

DESCRIPTION

The Oregon 529 College Savings Network subtraction has expired and been replaced with a refundable credit. The last allowable contributions for this subtraction must have been made during tax years beginning before January 1, 2020. Nevertheless, there is a revenue impact for the 2023-25 biennium due to unused subtraction amounts carried forward to succeeding years. Carryforward of unused amounts in excess of the limitations may be subtracted from taxable income for up to four succeeding years after the donation. A taxpayer who donated at the time of the sunset may have carried forward unused amounts through tax years beginning before January 1, 2024.

A subtraction was allowed from individual taxable income for contributions made to Oregon 529 College Savings Network accounts for higher education. The maximum allowable carryforward subtraction amount for 2023 was \$5,580 on a joint return or \$2,790 on all other returns. This maximum applies to the combined total of ABE account (see [1.306, ABE Account Contributions](#)) and Oregon 529 College Savings Network contributions carried forward.

The proceeds of these accounts are meant to be used to pay higher education related expenses for a designated beneficiary. Total contributions to these accounts were allowed up to the amount necessary to cover the qualified higher education expenses of the beneficiary or limits specified by the Oregon 529 Savings Board. Contributions over the annual limit could be carried forward for up to four years. Beginning with tax year 2012, taxpayers could make direct deposit contributions of personal income tax refunds into accounts.

The revenue impact above includes only the impact of the state allowed subtraction for contributions. Under federal law, contributions to these accounts are not tax deductible. However, earnings on contributions and qualifying distributions from the accounts are excluded from federal taxable income. The revenue impact and complete description of federal tax benefits applicable to Oregon 529 College Savings Network accounts are detailed in tax expenditure [1.002, Qualified Education Savings \(Federal\)](#).

Federal tax reform passed by Congress in December 2017, the Tax Cuts and Jobs Act, extended the tax exemption for earnings to distributions used to pay elementary and secondary school tuition. HB 4080 (2018) amended ORS 316.680 to specify that funds in Oregon 529 savings plans could be used for higher education expenses only, and that earnings and previously subtracted contributions that were withdrawn and used to pay K-12 costs must be added to taxable income.

Legislation in 2019 (HB 2164) replaced this subtraction with a refundable credit for contributions to an Oregon 529 College Savings Network account. For details on the new credit, see [1.405, Contributions to 529 Account](#).

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. Presumably, the purpose was to increase the ability of families and individuals to save for higher education.

WHO BENEFITS

Oregon personal income taxpayers who contributed to Oregon 529 College Savings Network accounts. For tax year 2022, only amounts carried forward from previous years were allowed to be subtracted. The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	280	\$2,120	\$0.6	<\$0.1	<1%
\$19,400 - \$40,400	270	\$1,760	\$0.5	<\$0.1	1%
\$40,400 - \$67,700	510	\$1,710	\$0.9	\$0.1	2%
\$67,700 - \$117,800	1,600	\$2,200	\$3.5	\$0.3	10%
Above \$117,800	7,610	\$3,530	\$26.9	\$2.5	86%
All Full-Year Filers	10,270	\$3,150	\$32.4	\$2.9	100%
Part-Year and Nonresident Filers	350	\$3,290	\$1.2	\$0.1	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Not evaluated.

1.302 SCHOLARSHIP AWARDS USED FOR HOUSING EXPENSES

Oregon Statute: 316.846

Sunset Date: None

Year Enacted: 1999

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,400,000	\$1,400,000
2025-27	Not Applicable	\$1,400,000	\$1,400,000

DESCRIPTION

A subtraction from taxable income is allowed for scholarship and fellowship income used to pay for housing expenses. This provision extends the federal exclusion described in tax expenditure [1.001, Scholarship and Fellowship Income](#), for income received from scholarships and fellowships that is used only for tuition and course-related expenses. The scholarship recipient must be either the taxpayer or a dependent of the taxpayer and must be attending an accredited community college, college, university, or other institution of higher education. A subtraction may not be allowed under this section if the amounts are not included in the taxpayer's federal gross income for the tax year or are taken as a deduction on the taxpayer's federal income tax return for the tax year.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to help students meet the financial challenges of attending college.

WHO BENEFITS

Individuals receiving scholarship or fellowship income to pay for housing expenses. The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	550	\$4,450	\$2.4	\$0.1	26%
\$19,400 - \$40,400	440	\$5,630	\$2.5	\$0.2	41%
\$40,400 - \$67,700	170	\$5,370	\$0.9	\$0.1	16%
\$67,700 - \$117,800	90	\$5,560	\$0.5	<\$0.1	8%
Above \$117,800	70	\$6,240	\$0.4	<\$0.1	8%
All Full-Year Filers	1,320	\$5,130	\$6.8	\$0.5	100%
Part-Year and Nonresident Filers	210	\$5,380	\$1.1	<\$0.1	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure is a fiscally effective method of achieving its purpose, which is to reduce the cost of postsecondary education and training. It makes more funding available to these students, allowing them to complete their education with less debt. The preponderance of the expenditure is claimed by individuals that typically require the greatest assistance managing the cost of attendance (i.e., are least able to afford the cost of college/university).

Housing expenses are typically the largest expense for postsecondary students, making this an effective means for making postsecondary education and training more affordable. Because of the restrictions around using the benefit (the recipient must be either the taxpayer or a dependent of the taxpayer enrolled in an accredited institution), the benefit is effectively structured to flow to the intended recipients.

1.303 AMERICORPS AWARDS

Oregon Statute: 316.847

Sunset Date: 12-31-2026

Year Enacted: 2021

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$100,000	Less than \$100,000
2025-27	Not Applicable	Less than \$100,000	Less than \$100,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

AmeriCorps national service educational award amounts can be subtracted from Oregon personal taxable income. Education awards can be used to pay current educational expenses at eligible schools or used to repay qualified student loans.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2433 (2021), the purpose of this provision is "...to eliminate a tax burden on AmeriCorps members when using their education award, causing a subsequent increase in use of awards, and acting as an incentive for AmeriCorps members of other states to attend school in Oregon."

WHO BENEFITS

Individuals receiving AmeriCorps national service educational awards. In tax year 2022, about 30 personal income taxpayers saved approximately \$320, on average, using this subtraction.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure is a fiscally effective method of reducing the cost of postsecondary education and training. It makes more funding available to students who are strengthening communities through their AmeriCorps service. AmeriCorps members engage in community service, and this fiscal benefit encourages the feasibility of that work. The program allows them to complete their education with less debt. Because of the restrictions around using the benefit (the recipient must receive the AmeriCorps national service educational award), the benefit is effectively structured to flow to the intended recipients.

1.304 MEDICAL SUBTRACTION FOR ELDERLY

Oregon Statute: 316.693

Sunset Date: None

Year Enacted: 2013

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$55,000,000	\$55,000,000
2025-27	Not Applicable	\$55,000,000	\$55,000,000

DESCRIPTION

The amount an individual pays for medical care that is not compensated for by insurance or otherwise may be subtracted from their federal taxable income for purposes of calculating Oregon personal income tax liability. Medical care for dependents is not allowed to be subtracted under this provision. This subtraction is available to taxpayers age 66 and over.

The maximum allowable subtraction of medical expenses attributable to each individual taxpayer meeting the age requirement depends on filing status and income. None of the amounts are adjusted for inflation.

Filing Status	Federal Adjusted Gross Income	Maximum Allowable Subtraction per Qualifying Individual
Single or Married Filing Separately	Below \$25,000	\$1,800
	\$25,000 - \$49,999	\$1,400
	\$50,000 - \$99,999	\$1,000
	Above \$100,000	\$0
Married Filing Jointly, Head of Household, or Qualifying Surviving Spouse	Below \$50,000	\$1,800
	\$50,000 - \$99,999	\$1,400
	\$100,000 - \$199,999	\$1,000
	Above \$200,000	\$0

Legislation in 2013 (HB 3601) created this subtraction to replace the former Oregon Additional Medical Deduction for Elderly, which, when combined with the federal deduction, allowed certain taxpayers to deduct all or most of their medical and dental expenses from Oregon taxable income.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to offset the costs of medical and dental expenses for older taxpayers. The itemized deduction of the former expenditure was converted to a subtraction so that it would be available to all eligible taxpayers, whether they use the standard deduction or itemize their deductions.

WHO BENEFITS

Older taxpayers with medical and dental expenses. Approximately 285,100 returns used the subtraction for tax year 2022. The average subtracted amount per tax return was approximately \$1,600.

The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	56,400	\$1,120	\$63.0	\$1.4	5%
\$19,400 - \$40,400	50,840	\$1,710	\$87.1	\$4.6	16%
\$40,400 - \$67,700	54,430	\$1,720	\$93.4	\$6.5	23%
\$67,700 - \$117,800	71,730	\$1,710	\$122.4	\$9.9	35%
Above \$117,800	38,150	\$1,690	\$64.7	\$5.6	20%
All Full-Year Filers	271,550	\$1,590	\$430.6	\$27.9	100%
Part-Year and Nonresident Filers	13,540	\$1,540	\$20.9	\$0.8	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Department of Human Services

This tax measure seems to meet its purpose in allowing older individuals to deduct expenses for their medical and dental care from their Oregon taxable income. This allows individuals to keep or have more income available to them to support them remaining independent and less likely to use other state and federal programs.

1.305 ADDITIONAL DEDUCTION FOR ELDERLY OR BLIND

Oregon Statute: 316.695(7)

Sunset Date: None

Year Enacted: 1989

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$28,300,000	\$28,300,000
2025-27	Not Applicable	\$29,600,000	\$29,600,000

DESCRIPTION

Taxpayers age 65 or over and those who are blind receive a larger Oregon standard deduction from personal taxable income based on their filing status. For taxpayers who are single or head of household, the standard deduction is increased by \$1,200 per qualifying condition. For all other filers, the additional amount is \$1,000 per qualifying condition. For example, the additional deduction amount is \$2,400 if a single taxpayer is age 65 or over and blind. These amounts are not adjusted for inflation. This tax expenditure does not benefit taxpayers who itemize deductions for Oregon because they do not use the standard deduction. Taxpayers can take advantage of both this expenditure and [1.304, Medical Subtraction for Elderly](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to offset associated living expenses of Oregon taxpayers who are elderly or blind.

WHO BENEFITS

The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	44,530	\$1,120	\$60.7	\$1.4	11%
\$19,400 - \$40,400	25,440	\$1,100	\$35.3	\$2.6	21%
\$40,400 - \$67,700	24,770	\$1,090	\$34.4	\$2.8	23%
\$67,700 - \$117,800	26,090	\$1,050	\$39.1	\$3.3	27%
Above \$117,800	15,460	\$1,030	\$25.3	\$2.3	18%
All Full-Year Filers	136,290	\$1,080	\$194.9	\$12.3	100%
Part-Year and Nonresident Filers	14,250	\$400	\$7.7	\$0.5	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

Since both taxpayers on a joint return can claim this deduction, the 150,540 filed tax returns that took the subtraction presented in the above table represent approximately 199,230 individuals claiming the additional deduction. The majority, about 196,340, are elderly individuals.

EVALUATION

Provided by the Oregon Department of Human Services

This tax expenditure achieves its purpose and is effective in promoting independence among its recipients. The deduction allows for greater disposable income for eligible individuals and helps build individual self-sufficiency. This money enables individuals to avoid needing other services offered by the state Department of Human Services. It is most beneficial to those people who are on the margin between self-reliance and reliance on the state.

1.306 ABLE ACCOUNT CONTRIBUTIONS

Oregon Statute: 316.699

Sunset Date: 12-31-2019

Year Enacted: 2015

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$100,000	Less than \$100,000
2025-27	Not Applicable	\$0	\$0

DESCRIPTION

The ABLE (Achieving a Better Life Experience) Account Contributions subtraction has expired and been replaced with a refundable credit. The last allowable contributions for this subtraction must have been made for tax years beginning before January 1, 2020. Nevertheless, there is a revenue impact for the 2023-25 biennium due to unused subtraction amounts carried forward to succeeding years. Carryforward of unused amounts in excess of the limitations may have been subtracted from taxable income for up to four succeeding years after the donation. A taxpayer who donated at the time of the sunset may have carried forward unused amounts through tax years beginning before January 1, 2024.

A subtraction was allowed from individual taxable income for contributions made to an Oregon ABLE account when the contributions were made before the designated beneficiary of the account was 21 years old. The maximum allowable carryforward subtraction amount for 2023 was \$5,580 on a joint return or \$2,790 on all other returns. This maximum applies to the combined total of ABLE account and Oregon 529 College Savings Network (see [1.301, Oregon 529 College Savings Network](#)) contributions carried forward.

The proceeds of these accounts are meant to be used to pay qualified disability expenses of the designated beneficiary, including education, housing, transportation, employment training and support, health care, and financial management. Individuals diagnosed with a disability before the age of 26 (age 46 after 2025) are eligible for an Oregon

ABLE Savings Plan account. Up to \$100,000 can be saved within an ABLE account without the assets affecting federal and state benefits, and up to the gift tax exemption limit (\$18,000 in 2024) can be contributed annually. That said, for some taxpayers, the 2017 Tax Cuts and Jobs Act (TCJA) temporarily increased the allowable contribution for tax years 2018 through 2025. Beyond the standard annual contribution limit mentioned previously, eligible employed designated beneficiaries are allowed to contribute an additional amount up to the lower of the prior year’s poverty level for a household of one or the beneficiary’s compensation in the tax year. The TCJA also allows rollovers from 529 plans owned by the beneficiary or a family member into an ABLE account (subject to contribution limits).

Oregon legislation in 2017 (SB 1027) amended the law so that, in the event of the death of the designated beneficiary, the money in the ABLE account can be transferred to the estate of the beneficiary or to another eligible individual’s ABLE account.

The revenue impact above includes only the impact of the state-allowed subtraction for contributions. Under federal law, contributions to these accounts are not tax deductible. However, earnings on the contributions and qualifying distributions from the accounts are excluded from federal taxable income. The Joint Committee on Taxation considers the federal tax expenditure to be quantitatively *de minimis*. As such, the federal tax expenditure is listed in the "Other Federal Provisions" section of this report.

Legislation in 2019 (HB 2164) replaced this Oregon subtraction with a refundable credit for contributions to an ABLE account. For details on the new credit, see [1.411, Contributions to ABLE Account](#).

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. According to the legislative staff revenue impact statement for the bill that created the Oregon subtraction, SB 777 (2015), the purpose was “...to help people with disabilities to save money for necessary expenses to meet the challenges of life.”

WHO BENEFITS

For tax year 2022, only amounts carried forward from previous years were allowed to be subtracted. About 310 personal income taxpayers saved approximately \$130, on average, using this subtraction.

EVALUATION

Not evaluated.

1.307 SOCIAL SECURITY BENEFITS (OREGON)

Oregon Statute: 316.054

Sunset Date: None

Year Enacted: 1985

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,350,000,000	\$1,350,000,000
2025-27	Not Applicable	\$1,560,000,000	\$1,560,000,000

DESCRIPTION

Social Security and Railroad Retirement Board benefits are exempt from Oregon personal income tax. A portion of Social Security and Railroad Retirement Board benefits are considered nontaxable at the federal level. Oregon extends the tax exemption to the full amount of benefits. As a result, there are two tax expenditures pertaining to these benefits. This tax expenditure pertains to those benefits that are exempt only in Oregon (i.e., they are taxable at the federal level). The tax expenditure pertaining to those benefits that are exempt at both the federal level and in Oregon is [1.009, Social Security Benefits \(Federal\)](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the Official 1986 Primary Voters’ Pamphlet, which described the ballot measure that passed and amended the Oregon Constitution to ban state and local taxes on Social Security and Railroad Retirement Board benefits, “Social Security benefits are the basic

retirement income for many Oregonians. These benefits do not provide an adequate standard of living. The erosion of these benefits through taxations would place an undue hardship on many Oregonians least able to pay. The taxation of Social Security benefits would also be unfair. Social Security recipients paid income taxes on their contribution to Social Security during their many years of work. It would be unfair to tax these benefits after retirement.”

WHO BENEFITS

Oregon taxpayers who receive federally taxable Social Security or Railroad Retirement Board benefits.

For tax year 2022, the table below shows the combined usage of this subtraction and the federal exclusion, 1.009, Social Security Benefits (Federal).

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers with SS Benefits	Average SS Benefit	Total SS Benefits (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	104,960	\$1,240	\$2,397.1	\$129.9	14%
\$19,400 - \$40,400	68,360	\$1,960	\$1,758.8	\$134.3	14%
\$40,400 - \$67,700	70,490	\$2,110	\$1,817.7	\$148.8	16%
\$67,700 - \$117,800	98,980	\$2,470	\$2,864.3	\$244.0	26%
Above \$117,800	87,710	\$3,280	\$3,216.9	\$288.1	30%
All Full-Year Filers	430,510	\$2,200	\$12,054.8	\$945.1	100%
Part-Year and Nonresident Filers	43,650	\$650	\$382.5	\$28.3	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Department of Human Services

This tax expenditure achieves its purpose; however, the issue continues to be the focus of significant national discussion and debate. While this tax subtraction provides the recipients with more disposable income, some are concerned over the viability of the Social Security benefits system in the long term. Retirement index data forecasts that retirement programs and savings patterns of persons aged 30–48 years are not adequate to maintain these individuals at a living standard commensurate with their current living standards. Projections suggest that the rate of retirement savings must increase threefold from present standards in order to accomplish this future parity. The inability to achieve this parity will cause greater numbers of people to look to government service programs to assist them. The present population of those ages 30–48 years is substantial, and this program could have a dramatic impact when they reach the retirement age.

1.308 FILM PRODUCTION LABOR REBATE

Oregon Statute: 316.698 and 317.394

Sunset Date: 12-31-2029 (certification)

Year Enacted: 2005

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$1,000,000	\$1,000,000
2025-27	Less than \$100,000	\$1,000,000	\$1,000,000

DESCRIPTION

Labor rebate payments are excluded from taxation for individuals or corporations that incur \$1 million or more in actual expenses for film, commercial, or television show production in Oregon. For S corporations and other pass-through entities that have qualifying income for the subtraction, the subtraction is shared by the shareholders and subtracted from their Oregon personal income tax. The Oregon Film and Video Office (OFVO) certifies persons or businesses engaging in qualifying film production as eligible for the labor rebate, commonly known as the Greenlight Oregon Labor Rebate, if it is reasonably likely that the person or business will incur actual expenses of at least \$1

million. Upon completion of the film production, OFVO verifies actual expenses and disallows the rebate if actual expenses are less than \$1 million.

The labor rebate is equal to 6.2 percent of the payroll paid during qualifying film production for which Oregon personal income tax withholding applies. Upon verification that the qualifying film production has paid the required withholding taxes, the Department of Revenue issues rebate payments to the Greenlight Oregon Labor Rebate Fund (GOLRF).

Legislation in 2021 extended the scheduled sunset of the provision from December 31, 2023 to December 31, 2029 (HB 2433).

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2433 (2021), the purpose of this provision is “...to maximize the value of the Greenlight Oregon Labor Rebate Fund.”

WHO BENEFITS

Individuals and businesses engaging in film production with expenses over \$1 million who receive labor rebate payments from the GOLRF. The Department transferred \$5.8 million to the GOLRF in fiscal year 2023 and \$5.9 million in fiscal year 2024.

EVALUATION

Provided by the Oregon Film and Video Office

This tax expenditure achieves its purpose of retaining and recruiting film production in the state and generating associated spending and employment. Without this program, there would undoubtedly be a drop in activity for Oregon's film, television, and commercial industry. This is an industry that provides jobs, small business spending and on-going media marketing value for the state.

The GOLRF, in tandem with the Oregon Production Investment Fund (OPIF), is integral in Oregon's ability to compete with the more than 30 other US states that offer production incentives and is directly responsible for the \$285 million of direct film, television, and commercial production spending that was recorded in the 2021-2023 biennium. This number includes more than \$37 million of local commercial production spending directly attributed to the GOLRF program.

In addition to helping recruit out-of-state productions into Oregon, this program also supports Oregon's local commercial production industry. Oregon-based commercial production companies utilize GOLRF to increase their competitive edge to both create work here in the state for export and to attract work into the state, creating a more sustained workforce and a stronger company foundation. Combined, GOLRF and OPIF have accounted for a more than \$2 billion in direct production spending in Oregon since the program's inception in 2005, currently affecting more than 3600 jobs on an annual basis on more than 100 Oregon-based projects.

GOLRF has been integral to creating a balanced system that imports work into the state as much as creates and retains work from established companies and individuals already located here in the state. Oregon's media incentive programs are critical to making media work more competitive here in Oregon in a national landscape that includes more than 30 states and all Canadian provinces offering Film & Media incentive programs.

1.309 ARTIST'S CHARITABLE CONTRIBUTION

Oregon Statute: 316.838

Sunset Date: None

Year Enacted: 1979

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$100,000	Less than \$100,000
2025-27	Not Applicable	Less than \$100,000	Less than \$100,000

DESCRIPTION

Under section 170 of the federal Internal Revenue Code, artists who donate their artwork for charitable contributions can only deduct the costs of materials used to produce the artwork, not the fair market value of the artwork. Oregon law expands the federal provision for charitable contributions, in that it allows artists liable for Oregon personal income taxes to subtract from taxable income the fair market value of the art, not just the costs of materials. Note that this subtraction only applies to artwork donated by the artist because if the donation of the artwork is by someone other than the artist, federal provisions already allow the deduction of the fair market value of the artwork. Due to the passage of HB 2060 in 2013, artists cannot use this subtraction if the donation was to a charitable organization disqualified from receiving tax deductible contributions due to not spending at least 30 percent of its total annual functional expenses on program services.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage the donation of artists' works to charitable organizations.

WHO BENEFITS

Artists who donate their art to charitable organizations benefit from this expenditure. For tax year 2022, approximately 240 personal income taxpayers claimed an average subtraction of \$1,300, resulting in a tax savings of \$100 per taxpayer.

EVALUATION

Not evaluated.

1.310 OREGON INVESTMENT ADVANTAGE

Oregon Statute: 316.778 and 317.391

Sunset Date: None

Year Enacted: 2001

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Available*	Not Available*	Not Available*
2025-27	Not Available*	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue impact numbers are not provided for tax expenditures that may affect at most a few taxpayers.

DESCRIPTION

Income from business operations at a certified facility may be subtracted for up to 10 consecutive years from Oregon taxable income on personal or corporate tax returns. For S corporations and other pass-through entities that have qualifying income, the subtraction is distributed among the shareholders or owners of the business to potentially reduce their Oregon personal income taxes. To be eligible for the subtraction, the business must apply for preliminary certification from the Oregon Business Development Department (OBDD) before hiring employees, starting construction, making improvements, or beginning facility operations. To qualify for preliminary certification, all the following must be true:

- The proposed facility site is in an eligible county (see below), and
 - (i) inside the urban growth boundary of a city of 15,000 or fewer residents, or
 - (ii) on industrially zoned land in a larger city or unincorporated area.
- The proposed facility is intended to operate for at least 10 years.
- The proposed operations at the facility

- (i) constitute new business operations, unlike what the business does anywhere else in Oregon, and
- (ii) do not compete with existing employers in the city, port, or county where the facility is located.
- The city, port, or county does not formally object within 60 days.
- The business intends to hire five or more full-time, year-round employees, who for preliminary certification applications submitted to OBDD:
 - between July 1, 2011, and October 5, 2017, receive compensation (wages and benefits) at least 50 percent higher than per capita personal income (PCPI) for the county at the time of the application, or at least equal to county PCPI while providing health insurance benefits, or,
 - since October 6, 2017 (HB 2066, 2017):
 - (i) receive compensation meeting the above minimums or that is at least 30 percent more than county PCPI for locations outside any metropolitan statistical area, and
 - (ii) (in all cases) receive average annual wage at least equal to the current average wage for the county.

To claim the subtraction, a preliminarily certified business needs to apply annually to OBDD for certification and confirm compliance with hiring and compensation requirements. If the business does not comply in a particular year when seeking certification, it is disqualified from the program for that year and any subsequent year.

Since July 1, 2016, a statutory definition for eligible counties are those counties that are both in the lower half among county PCPIs and in the upper half of annual unemployment rates. In 2024, this meant that businesses may apply to receive preliminary certification for locations only in 14 counties: Baker, Crook, Curry, Douglas, Grant, Harney, Jefferson, Josephine, Klamath, Lake, Linn Umatilla Union and Wallowa.

For a corporation, the amount of subtracted income is determined by multiplying the corporation's Oregon taxable income by the sum of:

- Fifty percent of the ratio of the payroll of the business from employment at the certified facility to total statewide payroll of the business, and
- Fifty percent of the ratio of the value of the property of the business at the certified facility to the value of the property of the business statewide.

For a personal income taxpayer who qualifies for a subtraction as a shareholder or owner of an S corporation or other pass-through entity that operates a certified facility, the amount of subtracted income is determined by multiplying the taxpayer's federal taxable income (limited for non-residents or part year residents to Oregon-sourced federal taxable income) by the product of:

- The ratio of the taxpayer's portion of federal adjusted gross income from the business to the taxpayer's total federally adjusted gross income, and
- The ratio of business income derived from sales at the certified facility to sales from all the business's activities.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to encourage business development in low-income areas with high unemployment rates, especially those areas with low population.

WHO BENEFITS

Businesses investing in new facility operations in areas with relatively high unemployment and lower incomes, especially in smaller cities.

During the 2024 fiscal year, OBDD issued annual certifications for fewer than ten businesses.

EVALUATION

Provided by the Oregon Business Development Department

Depending on a business firm's state income tax situation and the nature of the facility, this exemption of taxable income—as a type of state tax holiday—may seem quite enticing for developments ranging from those by small business owners to very large corporate projects in certain parts of rural Oregon, where it is otherwise challenging to spur economic activity and diversity. It is, however, a complex incentive, requiring sophisticated tax knowledge to even estimate the probable, medium-term savings in any given case.

After 2011, new preliminary certification applications dropped off, probably due in part to further statutory complexities that hindered communication and marketing of this tax exemption, despite the five-year reinstatement of slightly broader eligibility criteria. Currently certified business firms employ 220 persons full-time with excellent levels of compensation for rural Oregon.

As Oregon's only significant incentive for business development based on state income taxes, this expenditure is valuable in fostering private investments to help counterbalance conditions in parts of Oregon that lack urban centers in economic development activity. Not only is it unique, but the tax benefit does not depend on the sheer size of new capital outlays like a property tax abatement. Even though its geographic focus is still quite narrow within rural Oregon, and despite other restrictions on use, this expenditure has served as a critical driver in advancing certain projects.

Further analysis is needed to take these geographic objectives into account, as well as incremental tax effects among a relatively small number of situations. Business Oregon presently lacks access to data and resources to thoroughly conduct such an analysis.

It may be noted, however, that while an analogous income tax credit would be simpler to communicate to businesses, this expenditure is less comparable to a direct government expenditure than a credit would be. The taxes abated by this expenditure might relate more directly to otherwise additional state tax revenues, such that there is not necessarily as much of a net fiscal loss. Other advantages over a direct expenditure include individual businessperson's determining where and what investments are economically cost-effective under the current tax structure, market conditions and so forth, as well as general avoidance of bureaucratic-administrative costs, complications or resource allocation inefficiencies. Nevertheless, it is not as finely controllable as a direct expenditure might be for policy purposes.

Other than its policy bias toward rural locations and against the expansion of existing business operations, this tax expenditure does not favor one group of industries in Oregon over another. Finally, like a tax credit, its effectiveness as an incentive depends on the taxpayer's having an Oregon tax liability, but the 10-year exemption period and potential for the new facility to generate additional taxable income could mitigate that issue.

1.311 DIVIDEND RECEIVED FROM AN IC-DISC

Oregon Statute: 316.749(1)

Sunset Date: None

Year Enacted: 2013

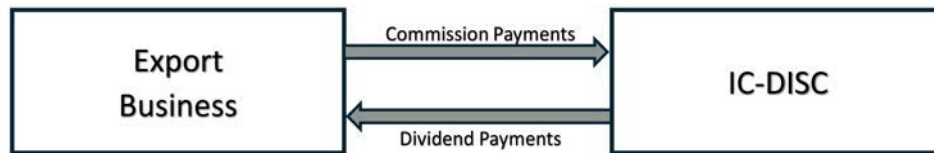
	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$13,200,000	\$13,200,000
2025-27	Not Applicable	\$14,100,000	\$14,100,000

DESCRIPTION

Personal income taxpayers may subtract from Oregon taxable income any dividend received since 2013 from an Interest Charge – Domestic International Sales Corporation (IC-DISC) that was formed on or before January 1, 2014 if the IC-DISC is subject to tax under ORS 317.283(2)(a). An IC-DISC is defined in section 992 of the Internal Revenue Code.

As a simple overview, an export-oriented business creates an IC-DISC. The business then makes commission payments to the IC-DISC as a percentage of export sales. This income to the IC-DISC is then returned to the owners or

shareholders of the business as dividends. In most cases, aside from other functions or services performed through the IC-DISC, the amount of commission payments will equal the amount of dividend payments. The diagram below shows this simplified flow of funds.



At the federal level, regardless of when the IC-DISC was formed, an IC-DISC is not subject to federal income taxes and the dividends are taxed at the lower capital gains tax rate rather than the standard federal personal income tax rate.

At the state level, taxation of an IC-DISC depends on when the IC-DISC was formed. First, the commission payments to an IC-DISC are deductible if the IC-DISC was formed on or before January 1, 2014. Second, the IC-DISC formed before 2014 is taxed at a rate of 2.5 percent on its commissions received (see In Lieu below). Third, the owners or shareholders of the IC-DISC subtract the IC-DISC dividends on their personal income tax returns. In general, the net effect of the flow of payments is that the IC-DISC income distributed to the IC-DISC’s owners or shareholders is taxed at a rate of 2.5 percent rather than at the prevailing marginal income tax rate of typically 8.75 or 9.9 percent.

For Oregon export businesses that created an IC-DISC after January 1, 2014, the IC-DISC is disregarded and dividends paid by it to the export business are treated as regular taxable income.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 3601 (2013 Special Session), the purpose of this provision “...is to encourage export activity of Oregon based businesses.”

WHO BENEFITS

Taxpayers with taxable personal income who receive a dividend from an IC-DISC that was formed on or before January 1, 2014. In tax year 2022, about 250 personal income taxpayers saved approximately \$24,000 in tax, on average, using this subtraction.

Over 99 percent of the revenue impact goes to personal income tax filers with incomes above \$100,000.

IN LIEU

An IC-DISC is taxed on income at a rate of 2.5 percent. For tax year 2021, approximately 230 IC-DISCs paid a total of \$3.0 million in income tax.

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure may bolster foreign sales activity for certain Oregon exporters that work with IC-DISCs formed before 2014 especially during the brief period immediately following passage of HB 3601 by the 2013 special session of the Legislature, which could have an ongoing benefit to the Oregon economy. Nationally, that is the intent of the federal law that provides for IC-DISCs in the first place; for any IC-DISC formed after 2013, Oregon provisions for affected taxpayers operate more restrictively with respect to state taxable income compared to federal tax returns. The department lacks data or direct experience to address this expenditure further.

1.312 INDIVIDUAL DEVELOPMENT ACCOUNTS (EXCLUSION AND SUBTRACTION)

Oregon Statute: 316.848

Sunset Date: None

Year Enacted: 1999

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$100,000	Less than \$100,000
2025-27	Not Applicable	Less than \$100,000	Less than \$100,000

DESCRIPTION

Contributions, matching deposits (from fiduciary organizations), and account earnings of individual development accounts (IDAs) for low-income households are exempt from state income tax if funds are withdrawn for approved purposes. Contributions to the accounts by the account holder are subtracted from federal taxable income of the account holder as they are made, and the matching deposits and account earnings are exempt from taxation until withdrawn. If withdrawals from the account are for a qualified purpose, the entire withdrawal is exempt from taxation. For this subtraction, low-income households are defined as those having a net worth less than \$20,000 and income no greater than 80 percent of the area median household income as determined by the U.S. Department of Housing and Urban Development.

The Oregon Housing and Community Services Department (OHCS) administers the Oregon IDA Initiative through Neighborhood Partnerships, which selects fiduciary organizations to manage the IDAs. These fiduciary organizations may establish lower thresholds for income and net worth of account holders than prescribed by statute. Approved purposes for which withdrawals may be made include: acquiring postsecondary education, the first time purchase of a primary residence, certain improvements and repairs to a primary residence, purchase of equipment or training needed to obtain or maintain employment, saving for retirement, and capitalization of a small business. Account holders may not accrue more than \$6,000 of matching funds in any 12-month period. OHCS establishes a maximum total amount of state directed resources that may be used as matching funds for asset purchase for each individual development account.

Amounts remaining in accounts after asset purchase may be rolled over into qualified tuition savings program accounts. Legislation in 2015 (HB 2171) expanded the approved purposes for which withdrawals may be made and provided that accounts established for retirement savings may be rolled over into an individual retirement account, a retirement plan, or a similar account or plan established under the Internal Revenue Code. Legislation in 2021 (HB 2433) increased the maximum accrual of matching funds during any 12-month period from \$3,000 to \$6,000.

There is another tax expenditure closely related to this program: [1.423, Individual Development Account Donation \(Credit\)](#), provides a credit for individuals or businesses that make contributions to the Oregon IDA Initiative through Neighborhood Partnerships in support of IDA programs.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to help lower income Oregonians obtain the assets needed to become economically more resilient by instituting an asset-based prosperity strategy that promotes improved personal financial management and savings and the accumulation of key assets.

WHO BENEFITS

In tax year 2022, about 90 personal income taxpayers saved approximately \$110, on average, using this subtraction.

EVALUATION

Not evaluated.

1.313 MANUFACTURED DWELLING PARK CAPITAL GAIN

Oregon Law: Ore. Laws 2005 c.826 §6-10

Sunset Date: 12-31-2025

Year Enacted: 2005

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$900,000	\$900,000
2025-27	Less than \$100,000	\$300,000	\$300,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

Individuals or corporations that sell a manufactured dwelling park may subtract the taxable gain from Oregon taxable income if the sale was made to a corporate entity formed by tenants of the park, or a nonprofit corporation or housing authority as described in ORS 90.844. In 2019, the Legislature (HB 2164) extended the sunset to December 31, 2025.

HB 2456 (2021) allows individuals or corporations to subtract the taxable gains from Oregon taxable income for any manufactured dwelling park that is destroyed by a natural disaster if the sale is made to a nonprofit corporation or housing authority that will redevelop the site as a manufactured dwelling park.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of this subtraction is “to encourage sales of manufactured dwelling parks to a corporate entity formed by the tenants of the park, or by a nonprofit corporation or housing authority.”

WHO BENEFITS

Owners of manufactured dwelling parks who sell to one of the listed organizations and have a gain as a result of the sale. Few taxpayers have used this expenditure.

EVALUATION

Provided by the Oregon Housing and Community Services Department

Through General Housing Account Program (GHAP) and/or Housing Development Grant Program (HDGP) funding, a number of manufactured home parks were preserved and sold either to a nonprofit or to a resident nonprofit cooperative, where the tenants form an organization to purchase the park. Preservation of parks is a critical tool for retaining housing stock affordable to low-income Oregonians, particularly for lower income rural communities. Nonprofits and resident nonprofit cooperatives compete with private investors when manufactured dwelling parks are for sale and this incentive provides a useful tool for encouraging park owners to consider selling to nonprofits. Despite low usage, any incentive that promotes retention of manufactured parks is absolutely meeting its objectives and is achieving the purpose of the tax expenditure.

1.314 FIRST-TIME HOME BUYER SAVINGS

Oregon Statute: 316.798

Sunset Date: 12-31-2026 (new accounts); 12-31-2036 (existing accounts)

Year Enacted: 2018

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,100,000	\$1,100,000
2025-27	Not Applicable	\$3,000,000	\$3,000,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A subtraction from Oregon taxable income is allowed for cash contributed by an eligible account holder to an eligible first-time home buyer savings account. In addition, earnings on the account, including interest and other income, are exempt from state taxation up to a specified limit, provided that conditions are met.

A savings account is eligible if it is established for the purpose of paying or reimbursing the down payment and allowable closing costs for the purchase of a single-family dwelling in Oregon that serves as the principal residence of the account holder (or a qualified beneficiary, starting in 2025). Manufactured homes, residential trailers, mobile homes, and condominium units also qualify. A home buyer is eligible if they are an Oregon resident and haven't owned or purchased a single-family residence within three years prior to purchasing the single-family residence.

The subtraction may be claimed each year for up to ten years after the account is opened and cannot exceed specified limits that are adjusted for inflation. The combined principal and earnings per account holder that may be subtracted over the ten years is limited to \$50,000. This subtraction is not available to accounts opened after December 31, 2026.

The subtraction is phased out for taxpayers with federal adjusted gross income of \$104,000 or more if filing individually or income of \$149,000 or more if filing a joint return. This table shows the maximum allowable annual subtraction amounts for 2024. Only amounts in the rightmost column are adjusted for inflation.

Filing Status	Federal Adjusted Gross Income	Maximum Allowable Subtraction
Married Filing Jointly	Below \$149,000	\$11,865
	\$149,000 - \$157,999	\$9,495
	\$158,000 - \$166,999	\$7,120
	\$167,000 - \$175,999	\$4,750
	\$176,000 - \$186,999	\$2,375
	Above \$186,999	\$0
All Others	Below \$104,000	\$5,935
	\$104,000 - \$110,999	\$4,750
	\$111,000 - \$116,999	\$3,560
	\$117,000 - \$122,999	\$2,375
	\$123,000 - \$130,999	\$1,190
	Above \$130,999	\$0

To qualify for the subtraction, an eligible residence must be purchased within ten years of opening the account. Any amount withdrawn and used for an unqualified purpose before the end of the ten-year period is subject to a five percent penalty and the amount withdrawn must be added back to income if previously subtracted. Any amount that remains in the account at the end of the tenth year must be added back to income if previously subtracted.

People other than the account holder may contribute to an account established for this program. However, only the account holder is eligible to claim this subtraction on their Oregon return.

Legislation in 2024 (SB 1527) made two modifications to this subtraction for accounts created on or after January 1, 2025. First, it allows the funds to be used by a designated qualified beneficiary in addition to the account holder. Second, it removes the requirement for financial institutions to designate accounts as first-time home buyer savings accounts and instead requires the taxpayers to designate the accounts.

PURPOSE

The law that created this subtraction, Oregon Laws 2018, Chapter 109, states that “the Legislative Assembly finds that saving for a down payment and closing costs for the purchase of a first home is challenging in the present economy. The first-time home buyer savings account program will provide opportunities for Oregon residents to save funds for first-time home ownership and will provide Oregonians with meaningful incentives to save for the purchase of a first home.”

WHO BENEFITS

For tax year 2022, approximately 1,250 taxpayers claimed this subtraction. The average subtraction was slightly over \$5,000.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	70	\$3,440	\$0.2	<\$0.1	1%	
\$19,400 - \$40,400	160	\$3,960	\$0.6	<\$0.1	9%	
\$40,400 - \$67,700	350	\$4,330	\$1.5	\$0.1	26%	
\$67,700 - \$117,800	440	\$5,870	\$2.6	\$0.2	44%	
Above \$117,800	180	\$6,250	\$1.1	\$0.1	20%	
All Full-Year Filers	1,190	\$5,080	\$6.1	\$0.5	100%	
Part-Year and Nonresident Filers	60	\$5,740	\$0.3	<\$0.1		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Housing and Community Services Department

Homeownership is a key tool for lifting families out of poverty and creating generational wealth, which disproportionately impacts communities of color who have been excluded from ownership through direct actions of governments, financial institutions, and individual actors. OHCS doesn't administer this program and therefore cannot speak to the utilization rate or ultimate success.

1.315 MANUFACTURED DWELLING TENANT PAYMENT

Oregon Statute: 316.795 and 317.092

Sunset Date: None

Year Enacted: 2007

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

Under state law (ORS 90.645), an owner of a manufactured dwelling park is required to pay each manufactured dwelling tenant if the tenant is forced to relocate because the owner is closing the park. The tenant receiving this money can subtract this amount from their Oregon taxable income.

The payment amount depends on the size of the dwelling. Legislation passed in 2017 (HB 2008) requires the Oregon Housing and Community Services Department (OHCS) to update the amounts annually for inflation. OHCS reports that, as of 2024, the tenant of a single-wide manufactured dwelling will receive \$7,982; the tenant of a double-wide manufactured dwelling will receive \$10,643; and the tenant of a triple-wide manufactured dwelling will receive \$13,304.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to provide financial assistance to manufactured dwelling owners who are forced to relocate because of the closure of the manufactured dwelling park.

WHO BENEFITS

Residents of closed manufactured dwelling parks who receive payments from the park owners. Few taxpayers claim this subtraction.

EVALUATION

Not evaluated.

1.316 INTEREST FROM STATE AND LOCAL GOVERNMENT BONDS**Oregon Statute:** 316.056**Sunset Date:** None**Year Enacted:** 1987

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$300,000	\$300,000
2025-27	Not Applicable	\$300,000	\$300,000

DESCRIPTION

Interest or dividends from all federally taxable bonds issued by Oregon state and local governments may be subtracted from Oregon taxable income. This includes interest or dividends received from obligations of counties, cities, local service districts, special government bodies, the Oregon Health and Science University, Oregon public universities, or other political subdivisions of Oregon that are authorized by the Legislative Assembly to issue bonds. Interest on revenue bonds issued by the State Treasurer can be subtracted from income for tax purposes only to the extent that the structure financed is located within Oregon.

This provision also applies to nonqualified private activity bonds, which are bonds primarily issued by local governments to help finance private developments.

This subtraction applies only to interest or dividends that are taxed at the federal level but not by Oregon. See tax expenditure [1.043, Interest on Oregon State and Local Debt](#), for information related to interest or dividends not taxed federally or by Oregon.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to promote projects that have public benefits by encouraging the purchase of federally taxable bonds issued by the State of Oregon and local governments.

WHO BENEFITS

Taxpayers holding these bonds benefit from the tax-free interest income. For tax year 2022, approximately 810 personal income taxpayers claimed an average subtraction of about \$2,300 using this provision. The State of Oregon and local governments also benefit because this provision reduces the costs of borrowing.

EVALUATION

Not evaluated.

1.317 PERSONAL CASUALTY LOSS**Oregon Statute:** 316.850**Sunset Date:** 12-31-2025**Year Enacted:** 2023 (HB 2812)

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$600,000	\$600,000
2025-27	Not Applicable	\$200,000	\$200,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

The federal Tax Cuts and Jobs Act (TCJA) of 2017 temporarily limited the deduction of personal casualty losses only to those caused by a federally declared disaster. An Oregon provision enacted in 2023 (HB 2812) allows for the subtraction from taxable income of personal casualty losses that are incurred in Oregon and would have been federally deductible if not for the TCJA.

For this subtraction, qualified personal casualty losses must result from an event that is subject to a state of emergency declared by the Governor or which occur in an area subject to a Governor's executive order invoking the Emergency Conflagration Act. Subtractions are not allowed for losses from theft or which are deducted on a taxpayer's federal income tax return. Except for the requirement of a federal disaster declaration, other limitations associated with federal deductions for casualty losses still apply. See 1.222, [Casualty and Theft Losses](#) for a description of the related federal tax expenditure.

This subtraction applies to tax years beginning on or after January 1, 2020 and before January 1, 2026.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2812 (2023), "the policy purpose of this measure is to provide support to Oregonians with property destroyed in areas subject to Oregon declared emergencies thereby eliminating the tax deduction disparity between federal and state declared disasters."

WHO BENEFITS

Personal income taxpayers who would have been otherwise limited by a temporary federal law in their ability to subtract or deduct qualified personal casualty losses for Oregon tax purposes.

EVALUATION

Provided by the Oregon Department of Emergency Management

The purpose of this tax expenditure appears to be meeting the appropriate stipulations for those residents incurring personal casualty losses in Oregon due to a catastrophic event for which a state of emergency has been declared by the Governor. Without this declaration, or invoking of the Emergency Conflagration Act, Oregonians affected by the event would be at a distinct economic disadvantage when trying to recover from personal casualty loss.

The structure of the tax expenditure allows those directly affected to benefit from the disparity that exists between federal and state law without this tax expenditure.

1.318 WILDFIRE JUDGMENT OR SETTLEMENT AND LEGAL FEES

Oregon Law: Ore. Laws 2024 c.50

Sunset Date: 12-31-2025 (see description)

Year Enacted: 2024 (SB 1520)

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	Not Available	Not Available
2025-27	Not Applicable	Not Available	Not Available

DESCRIPTION

Income received in judgment or settlement of a civil lawsuit arising from a qualifying wildfire may be subtracted from taxable income for Oregon personal income tax purposes. Wildfires (defined in ORS 477.089) qualify for this subtraction if they are the subject of a state of emergency declared by the Governor, occur in an area subject to an executive order of the Governor invoking the Emergency Conflagration Act, or are federally declared disasters, whether located within Oregon or elsewhere.

This subtraction is only allowed for amounts not taken as a deduction or credit from federal income taxes and only to the extent that the damages remedied by the judgment or settlement are not compensated by insurance or otherwise.

Legal fees incurred by a plaintiff in wildfire-related litigation may also be subtracted from taxable income. In contrast, for tax years 2018 through 2025, such legal fees are not generally allowed to be deducted for federal tax purposes due to the federal Tax Cuts and Jobs Act of 2017.

The subtraction applies to declarations and executive orders issued between January 1, 2018 and December 31, 2025. Judgment or settlement amounts or legal fees arising from wildfires during that time may be subtracted as they are received or incurred going forward, effective 2018. For tax years beginning before January 1, 2021, taxpayers may file amended returns on an extended timeline (prior to May 15, 2025) to claim the subtraction retroactively. No interest accrues on such retroactive claims for applicable refunds.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 1520 (2024), "the policy purpose of this measure is to assist taxpayers in rebuilding and recovering following the impact of a catastrophic wildfire."

WHO BENEFITS

Plaintiffs in wildfire-related civil litigation who pay legal fees or receive a judgment or settlement arising from a qualifying wildfire. Relatively few taxpayers have used this new subtraction as of the publication date of this report.

EVALUATION

Provided by the Oregon Department of Emergency Management

The purpose of this tax expenditure appears to be meeting the appropriate stipulations for those residents incurring legal fees or receiving a judgment in wildfire-related civil litigation in Oregon due to a catastrophic event for which a state of emergency has been declared by the Governor.

Oregonians affected by such events are already dealing with the effects of the catastrophic event and the benefit of this subtraction appears to be properly structured to pass through to its intended recipients allowing for economic relief as applicable.

1.319 DEPLETION COSTS FOR METAL MINES

Oregon Statute: 317.374

Sunset Date: None

Year Enacted: Pre-1953

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

Oregon operators of timber, mines, fossil fuel wells and other natural deposits are allowed a depletion allowance based on the cost of the property used to produce the natural resources (known as cost depletion). A partial exception exists for Oregon operators of metal mines which are allowed the option of calculating depletion using the percentage depletion method as opposed to cost depletion which is considered the standard accounting method.

The percentage depletion method allows Oregon operators of metal mines to elect to deduct a depletion allowance equal to 15 percent of the gross income from the metal mine. Up to 50 percent of the net income from the metal mine may be deducted using the depletion allowance based on gross income from the metal mine.

A tax expenditure exists if the percentage depletion method used by the metal mine operator yields a greater tax benefit than the cost depletion method otherwise would.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage discovery and development of metal deposits by potentially reducing the taxes on mining operations.

WHO BENEFITS

Very few metal mining companies using the percentage depletion method.

EVALUATION

Not evaluated.

1.320 ENERGY CONSERVATION SUBSIDIES (OREGON)

Oregon Statute: 316.744 and 317.386

Sunset Date: None

Year Enacted: 1981

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

Cash payments provided by publicly and investor-owned utilities for the purchase or installation of an energy conservation device under the Residential Energy Conservation Act (ORS 469.631–469.687) can be subtracted from corporate and personal taxable income. Cash payments received from the Oregon Housing and Community Services Department for energy conservation in oil-heated dwellings are also eligible.

For personal income taxpayers who receive cash payments from utilities as part of energy conservation programs, federal law already exempts these payments for residential energy customers from personal taxable income; see [1.032, Energy Conservation Subsidies \(Federal\)](#). As a result, for personal income taxes, this expenditure only includes payments that are not covered by the federal law, that is, payments received from entities other than utilities.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to promote energy conservation by encouraging owners of housing to participate in conservation programs sponsored by utilities or the Oregon Housing and Community Services Department.

WHO BENEFITS

Homeowners and contractors who receive payments from the Oregon Housing and Community Services Department for completing weatherization or energy conservation projects on oil-heated dwellings. The Oregon Housing and Community Services Department expects to provide payments of approximately \$100,000 in 2024. Additionally, corporate owners of rental housing who receive cash payments from utilities as part of energy conservation programs may benefit.

EVALUATION

Not evaluated.

1.321 AGRICULTURE SECTOR NET OPERATING LOSS CARRYBACK

Oregon Law: Ore. Laws 2022 c.82 §12-15

Sunset Date: 12-31-2028

Year Enacted: 2022

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$10,600,000	\$100,000	\$10,700,000
2025-27	\$19,100,000	\$200,000	\$19,300,000

DESCRIPTION

Net operating loss carryback allows businesses that have losses in a given year to deduct these losses from the taxable profit of preceding years by amending prior year tax returns. For certain eligible personal and corporate taxpayers, a net operating loss may be carried back for up to three years preceding the tax year in which the losses occur. This loss carryback is available to losses arising in tax years 2023 through 2028. Eligible taxpayers are those doing business (as identified by the 2017 North American Industry Classification System) in crop production, animal production, or aquaculture.

The federal Tax Cuts and Jobs Act of 2017 (TCJA) allowed personal income taxpayers in the specified industries to carry back losses for two years and such losses were allowed to offset up to 80 percent of taxable income for tax years after 2017. Oregon legislation passed in 2022 (SB 1524) grants an additional year to carry back losses incurred on personal income and removes the limitation of offsetting only 80 percent of taxable income. For personal income taxes, this tax expenditure and revenue impact estimate only includes the additional year to carry back losses and the removal of the 80 percent limit, as the initial two years are included in [1.214, Extended Carryback of Farming Loss](#).

For corporations, the TCJA only allowed losses to be carried forward whereas carryback was not allowed. The new legislation in 2022 allows corporate taxpayers in the specified industries to carry back losses for a total of three years.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 1524 (2022) “the policy purpose of the net operating loss carryback provision is to smooth the tax liability of farm businesses reflective of the ups and downs in farm business income and losses.”

WHO BENEFITS

Personal and corporate income taxpayers in the agriculture sector.

EVALUATION

Provided by the Oregon Department of Agriculture

The tax subtraction facts are described and cannot be evaluated until implemented in 2024 for the 2023 tax year.

1.322 WET MARINE AND TRANSPORTATION POLICIES

Oregon Statute: 317.080(8)

Sunset Date: None

Year Enacted: 1995

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$2,500,000	Not Applicable	\$2,500,000
2025-27	\$2,500,000	Not Applicable	\$2,500,000

DESCRIPTION

Foreign or alien insurers (those formed under the laws of a state other than Oregon or a country other than the United States, respectively) that are authorized by Oregon and write wet marine and transportation (often referred to as ocean marine) insurance are allowed to subtract from taxable income the underwriting profit derived from wet marine and transportation insurance. As described in ORS 731.194, wet marine and transportation insurance covers:

- The insurance of ships and freight
- The insurance of personal property in transport between countries or transported by coast or inland waterways
- The insurance of railroads and aircraft along with their freight while engaged in interstate transport or commerce

Legislation in 2019 (HB 2787) limited this subtraction to only authorized insurers.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to conform to other states' tax treatment of wet marine and transportation insurers.

WHO BENEFITS

Authorized foreign or alien insurers that sell wet marine and transportation policies.

IN LIEU

Authorized insurers that write wet marine and transportation policies are required under ORS 731.824 to pay an underwriting profit tax. A 5 percent tax is imposed on the average wet marine insurance underwriting profit during the previous three years. For calendar year 2023, 87 insurers had premiums; 38 of these insurers paid \$191,885 in tax based on underwriting profits from writing wet marine and transportation insurance.

EVALUATION

Provided by the Department of Consumer and Business Services

Wet marine and transportation insurers have been taxed only on their underwriting profit since at least 1928. Wet marine and transportation is subject to federal law and treaty. Taxing wet marine and transportation insurers based on underwriting profit rather than gross premium helps to achieve uniformity among states. This method of taxation ultimately benefits parties that purchase this type of insurance, such as ports and interstate transportation carriers, including marine, railroad, and aircraft, by reducing the cost of insurance (if the insurer passes the savings on to the insured).

If this tax expenditure were eliminated, Oregon would have a unique tax structure compared to other states. If the tax subtraction were repealed, it could potentially put the policy holders at a competitive disadvantage with other states.

1.323 HYDROELECTRIC DAM AND WATERWAY WORKERS

Oregon Statute: 316.127(8) and (10)

Sunset Date: None

Year Enacted: 1997

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	Not Available	Not Available
2025-27	Not Applicable	Not Available	Not Available

DESCRIPTION

Under federal law enacted in 1998 (P.L.105-261), Oregon cannot tax nonresident federal employees who provide services at federally owned hydroelectric facilities on the Columbia River. In 2001, the Oregon Legislature (SB 426) made compensation nontaxable when earned by any nonresident dam workers on the Columbia River, not just nonresident federal employees working at the dams.

Under federal law approved in 2000 (P.L. 106-489), Oregon cannot tax nonresidents working on vessels or ships that operate in navigable waters of more than one state.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purposes are to comply with federal law and simplify tax compliance for certain nonresidents with regularly assigned duties in more than one state.

WHO BENEFITS

Nonresident workers at federal dams on the Columbia River and nonresident pilots, captains, and crews of vessels operating in navigable waters of more than one state.

EVALUATION

Provided by the Department of Revenue

This expenditure complies with federal law and also relieves the specified taxpayers of the difficulty of determining the portion of income earned in Oregon while working on dams or ships in border river areas.

1.324 INCOME EARNED IN "INDIAN COUNTRY"

Oregon Statute: 316.777

Sunset Date: None

Year Enacted: 1977

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$8,600,000	\$8,600,000
2025-27	Not Applicable	\$9,300,000	\$9,300,000

DESCRIPTION

Income earned within the boundaries of federally recognized "Indian country" (as defined in 18 USC 1151) in Oregon by members of federally recognized American Indian tribes is exempt from taxation under Oregon's personal income tax. The taxpayer must reside in Indian country in Oregon and the income must be earned in Indian country to qualify for the exemption.

As defined in 18 USC 1151, "Indian country" means "(a) all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and, including rights-of-way running through the reservation, (b) all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the limits of a state, and (c) all Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same."

PURPOSE

To comply with federal law.

WHO BENEFITS

Tribal members who earn income in "Indian country." The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	270	\$9,400	\$2.5	<\$0.1	1%	
\$19,400 - \$40,400	420	\$26,110	\$10.9	\$0.5	14%	
\$40,400 - \$67,700	420	\$43,490	\$18.2	\$1.1	29%	
\$67,700 - \$117,800	260	\$63,210	\$16.4	\$1.1	29%	
Above \$117,800	110	\$114,070	\$12.8	\$1.0	26%	
All Full-Year Filers	1,470	\$41,280	\$60.7	\$3.8	100%	
Part-Year and Nonresident Filers	30	\$31,380	\$1.1	\$0.1		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

1.325 FEDERAL PENSION INCOME

Oregon Statute: 316.680(1)(e)

Sunset Date: None

Year Enacted: 1998

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$129,000,000	\$129,000,000
2025-27	Not Applicable	\$129,000,000	\$129,000,000

DESCRIPTION

Pension income attributable to federal employment prior to October 1, 1991, is exempt from the Oregon personal income tax. The subtraction is prorated based on the number of months of federal employment prior to October 1991 versus the months after October 1991.

This tax expenditure is the result of a series of legislative actions and court cases through the 1990s which attempted to define a consistent tax policy toward government pension income. This followed the 1989 U.S. Supreme Court ruling that state pensions could not receive better tax treatment than federal pensions (*Davis v. Michigan*, 489 U.S. 803).

PURPOSE

To comply with federal law.

WHO BENEFITS

The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	1,890	\$9,450	\$17.8	\$0.3	<1%	
\$19,400 - \$40,400	5,250	\$16,090	\$84.5	\$3.6	6%	
\$40,400 - \$67,700	7,370	\$22,490	\$165.8	\$10.2	17%	
\$67,700 - \$117,800	10,860	\$27,570	\$299.3	\$22.6	37%	
Above \$117,800	8,710	\$32,000	\$278.8	\$24.0	40%	
All Full-Year Filers	34,080	\$24,830	\$846.2	\$60.7	100%	
Part-Year and Nonresident Filers	660	\$23,680	\$15.7	\$0.7		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

1.326 LEGISLATIVE PER DIEM AND ALLOWANCE

Oregon Statute: 171.072(7)

Sunset Date: None

Year Enacted: 1967

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$100,000	\$100,000
2025-27	Not Applicable	\$100,000	\$100,000

DESCRIPTION

Members of the Oregon Legislature are allowed to subtract from their Oregon taxable income a legislative per diem or allowance received. Members receive a per diem for each day that the Legislature is in session. In addition, members are entitled to a monthly allowance for expenses incurred in the performance of official duties during periods when the Legislature is not in session. Members may also receive mileage reimbursement and a per diem for each interim day spent serving on a nonlegislative committee or entity such as an interstate body or advisory committee. Further, when the Legislature is not in session, members may receive mileage reimbursement for periods spent working on a legislative committee or task force.

Reimbursements of actual expenses related to legislative work, as well as ordinary and necessary business expenses in excess of the reimbursements may also be subtracted from income for state income tax purposes. Reimbursements by the state for actual expenses for meals and lodging associated with state travel for the same period during which a legislator receives per diem are subject to state income tax.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to maintain the benefits available to members serving in Oregon’s Legislature.

WHO BENEFITS

Members of the Oregon Legislative Assembly. For tax year 2022, approximately 30 taxpayers claimed an average subtraction of about \$10,700, for an average tax savings of about \$950.

EVALUATION

Not evaluated.

1.327 OREGON STATE LOTTERY PRIZES

Oregon Statute: 461.560

Sunset Date: None

Year Enacted: 1985

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$400,000	\$400,000
2025-27	Not Applicable	\$500,000	\$500,000

DESCRIPTION

Oregon State Lottery (Lottery) prize winners may subtract from Oregon taxable income Oregon Lottery winnings of up to \$600. The \$600 limit applies to a single play of a single game. The amount is not adjusted for inflation.

Originally, all prizes awarded by the Lottery were exempt from tax. In 1997, the Oregon Legislature changed the law so that only prizes up to and including \$600 were exempt. However, individuals who purchased a winning ticket prior to January 1, 1998, may continue to subtract those winnings.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to enable ease of play and prize redemption for Lottery game participants and to support ease of selling and prize payment for Lottery game retailers.

WHO BENEFITS

For tax year 2022, approximately 640 personal income taxpayers claimed an average subtraction of about \$4,600 using this provision. The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	110	\$1,860	\$0.2	<\$0.1	2%	
\$19,400 - \$40,400	80	\$2,050	\$0.2	<\$0.1	5%	
\$40,400 - \$67,700	140	\$2,480	\$0.3	<\$0.1	13%	
\$67,700 - \$117,800	140	\$4,130	\$0.6	<\$0.1	25%	
Above \$117,800	130	\$9,540	\$1.2	<\$0.1	54%	
All Full-Year Filers	600	\$4,170	\$2.5	\$0.2	100%	
Part-Year and Nonresident Filers	40	\$11,530	<\$0.1	<\$0.1		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Lottery

This tax expenditure achieves its purpose and helps support the statutory purpose of the Lottery: to generate profits for the public purpose without imposing additional or increased taxes. Eliminating this tax expenditure would be a disincentive to players. Most prizes awarded in Lottery games are less than \$600. For example, in Fiscal Year 2023, players claimed more than \$170 million in prizes each worth \$600 or less. Because these prizes are not subject to reporting and withholding, winners can claim them through a statewide retailer network, such as at a local convenience store or gas station. The remaining prizes above \$600 are subject to reporting and taxation and/or withholding. In calendar year 2023, 8,147 W2Gs were sent to DOR resulting in the remittance of \$3,950,199.49 in state tax withholding for traditional Lottery prizes.

Since 2009, the Lottery has changed the prize mix on Video Lottery games offered to the public. In 2009 all Video Lottery prizes were under \$600 and therefore not subject to taxation. These prizes were paid by 3,200 retailers throughout the State. In 2010 Lottery began awarding prizes above \$600 which were subject to reporting and tax withholding for State purposes. In calendar year 2023, 47,220 W2Gs were sent to DOR resulting in the remittance of \$10,166,843.86 in state tax withholding for Video Lottery prizes.

In October 2019 Lottery introduced an on-line sports betting game which is sold only through Lottery's downloadable mobile application. In calendar year 2023, 60,886 W2Gs were sent to DOR resulting in the remittance of \$2,718,099.86 in state tax withholding for Lottery sports prizes.

As with Traditional prizes, most video prizes (which are also under \$600) are paid directly by Lottery retailers. Changing the taxation and reporting requirements for Video and Traditional prizes would require that winners travel to claim centers for payment of smaller prizes and would be a burden for both winners from an inconvenience perspective and the Lottery. Specifically, there would be significant costs to program Lottery gaming systems and change processes to accommodate the tax change to send out reporting and withholding documents to all players for prizes paid by Lottery. These costs would result in reduced funds available as transfers to beneficiaries.

Lottery continues to face pressures from other entertainment options and gambling opportunities (such as illegal offshore gambling) for which players do not pay taxes. If players choose other options, as an example, a loss of even 1% of video sales over the last two fiscal years to competition would have reduced transfers to the state by roughly \$15.8 million.

1.328 FEDERAL INCOME TAX SUBTRACTION

Oregon Statute: 316.680(1)(b), 316.685, and 316.695

Sunset Date: None

Year Enacted: 1929

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,200,000,000	\$1,200,000,000
2025-27	Not Applicable	\$1,420,000,000	\$1,420,000,000

DESCRIPTION

Taxpayers are allowed a limited subtraction for their current year's federal income tax liability after credits. The subtraction limit is up to \$8,250 for 2024 (indexed to inflation), except that those taxpayers who use a filing status of married filing separately have a subtraction limit up to 50 percent of that amount or \$4,125 for 2024.

The maximum subtraction limit is phased down for high income filers. Filers with a filing status of single or married filing separately with an adjusted gross income of \$125,000 to \$145,000 have a reduced limit, as do filers with a filing status married filing jointly, head of household, or surviving spouse with an adjusted gross income of \$250,000 to \$290,000. For filers with an adjusted gross income above their respective upper limit, no subtraction of their federal income tax is allowed.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to help offset payments toward a federal income tax liability for taxpayers whose income is below a certain threshold.

WHO BENEFITS

The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers						
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group	
Below \$19,400	66,230	\$290	\$19.5	\$1.6	<1%	
\$19,400 - \$40,400	254,190	\$1,600	\$407.9	\$34.5	7%	
\$40,400 - \$67,700	321,330	\$3,720	\$1,193.9	\$102.2	21%	
\$67,700 - \$117,800	357,360	\$6,070	\$2,168.3	\$187.5	38%	
Above \$117,800	276,690	\$6,700	\$1,852.9	\$162.1	33%	
All Full-Year Filers	1,275,810	\$4,420	\$5,642.5	\$487.9	100%	
Part-Year and Nonresident Filers	189,810	\$2,220	\$421.3	\$32.2		

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Not evaluated.

1.329 MILITARY ACTIVE DUTY AND RELATED PAY

Oregon Statute: 316.792

Sunset Date: None

Year Enacted: 1969

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$47,200,000	\$47,200,000
2025-27	Not Applicable	\$48,100,000	\$48,100,000

DESCRIPTION

Typically, military members who are Oregon residents or domiciled in Oregon may subtract qualifying military pay from Oregon taxable income.

Taxpayers may subtract all military pay for:

- Service performed outside this state in the year of initial draft or enlistment or in the year of discharge
- Service performed outside this state during any month beginning on or after August 1, 1990, and before the date designated by the President of the United States as the date of termination of combatant activities in the Persian Gulf Desert Shield area
- Service by a member of the reserve components, if:
 - The military pay is for service performed when the taxpayer is away from the home of the taxpayer overnight
 - The taxpayer is required to be away from home overnight in order to perform the service, and
 - The service is of a duration of at least 21 consecutive days, although the consecutive days need not be in the same tax year
- Service performed by a member of the Oregon National Guard while in active service of the state or on state active duty

An additional \$6,000 per year can be subtracted for service not otherwise qualified in the list above. The total amount subtracted may not exceed the taxpayer's total military pay included in federal taxable income for the tax year. See [1.507, Nonresident Armed Forces](#) for the special treatment of residency requirements for active-duty members of the military.

HB 2071 (2023) expanded the list of service to receive a full subtraction to include service performed by a member of the Oregon National Guard while in active service of the state or on state active duty.

PURPOSE

The statutes that allow this tax expenditure do not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2171 (2015), the purpose of this subtraction "... is to provide tax relief to service members ... in consideration of their work and sacrifices for their state and country."

WHO BENEFITS

The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	890	\$9,040	\$8.0	\$0.3	2%
\$19,400 - \$40,400	3,900	\$23,910	\$93.2	\$5.3	26%
\$40,400 - \$67,700	2,780	\$32,610	\$90.5	\$5.5	27%
\$67,700 - \$117,800	2,020	\$38,190	\$77.3	\$5.4	26%
Above \$117,800	1,410	\$37,810	\$53.2	\$4.1	20%
All Full-Year Filers	10,990	\$29,320	\$322.2	\$20.6	100%
Part-Year and Nonresident Filers	1,600	\$35,220	\$56.3	\$2.5	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Military Department

This tax expenditure achieves its purpose and is a valuable benefit to members of the Oregon National Guard, both Army and Air, as well as other military personnel. Although the subtraction per tax return is not a great deal of money,

it is one of few incentives the State of Oregon offers its citizen soldiers that is comparable to those offered in other states. When talking with prospective recruits or soldiers contemplating re-enlistment, the subject of state incentives frequently arises. There is merit in offering benefits that are comparable to those of other states; examples of which include free tuition to state colleges and universities, re-enlistment bonuses, free automobile licenses, free driver's licenses, and free hunting and fishing licenses. These state benefits are an inexpensive way to recognize the contributions Guard members make to their communities. They help the state recruit and retain quality soldiers and airmen and should be maintained by the State of Oregon.

1.330 INTEREST AND DIVIDENDS ON U.S. OBLIGATIONS

Oregon Statute: 316.680(1)(a)

Sunset Date: None

Year Enacted: 1970

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$79,000,000	\$79,000,000
2025-27	Not Applicable	\$62,000,000	\$62,000,000

DESCRIPTION

Interest and dividends earned on the direct obligations of the U.S. government are exempt from Oregon personal income tax. For example, the dividends or interest earned on U.S. Treasury bills, notes, bonds, and savings bonds are not taxable by state and local governments. Excluded from this provision are the debt instruments of quasi-governmental issuers like the Government National Mortgage Association and the Federal National Mortgage Association. Bonds issued by quasi-governmental issuers are not direct obligations of the U.S. government.

Interest income on state or local debt is excluded federally, and described in [1.043, Interest on Oregon State and Local Debt](#).

PURPOSE

To comply with federal law prohibiting states from taxing interest and dividends on U.S. government obligations.

WHO BENEFITS

The direct beneficiaries are taxpayers who receive income from U.S. obligations such as bonds. The table below shows usage of this subtraction for tax year 2022.

2022 Personal Income Tax Filers					
Income Group of Full-Year Filers*	Number of Filers Taking Subtraction	Average Subtraction	Total Subtracted (\$ millions)	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	6,740	\$770	\$5.2	<\$0.1	<1%
\$19,400 - \$40,400	6,390	\$960	\$6.2	\$0.3	2%
\$40,400 - \$67,700	8,720	\$1,320	\$11.5	\$0.8	5%
\$67,700 - \$117,800	15,820	\$1,830	\$29.0	\$2.3	16%
Above \$117,800	33,810	\$3,430	\$116.0	\$10.7	76%
All Full-Year Filers	71,470	\$2,350	\$167.9	\$14.1	100%
Part-Year and Nonresident Filers	2,640	\$2,970	\$7.8	\$0.4	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

1.401 EMPLOYER PROVIDED SCHOLARSHIPS

Oregon Statute: 315.237
Sunset Date: 12-31-2029
Year Enacted: 2001

Carryforward: 5 years
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

Qualifying employers may claim a credit against their income tax for 50 percent of the amount of scholarships funded for their employees or their employees' dependents, with a maximum credit of \$50,000 per tax year. The amount each taxpayer claims in any one year may not exceed the tax liability of that taxpayer for that year. If the credit exceeds the employer's tax liability, the excess may be carried forward up to five years. To qualify, employers must have between four and 250 full-time equivalent employees and have their scholarship program and credit amount certified by the Office of Student Access and Completion within the Oregon Higher Education Coordinating Commission. There is a \$1 million cap on the total amount of credits that can be certified per calendar year, and the total lifetime amount of credits an employer may claim is limited to \$1 million. The credit is prorated for a nonresident taxpayer.

Legislation in 2023 (HB 2071) extended the scheduled sunset of the provision from December 31, 2025 to December 31, 2029.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the revenue impact statement for HB 2164 (2019), the purpose of the credit is "to encourage and leverage private money to help pay for higher education."

WHO BENEFITS

Taxpayers with a tax liability who fund employee and dependent scholarship programs. Very few taxpayers benefit from this credit.

EVALUATION

Provided by the Higher Education Coordinating Commission

This benefit encourages employers to support the postsecondary education and training of its employees by providing a tax benefit to those employers for offering postsecondary scholarships to employees. Because the majority of postsecondary students are employed while they attend school, this benefit indirectly supports the educational attainment goals of individuals and the state.

1.402 CONTRIBUTIONS OF COMPUTER EQUIPMENT

Oregon Statute: 317.151
Sunset Date: 12-31-2013
Year Enacted: 1985

Carryforward: 5 years
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The Contributions of Computer Equipment credit expired as of December 31, 2013. Nevertheless, there may be revenue impacts for the 2023-25 and 2025-27 biennia due to unused credit amounts carried forward to succeeding years or new credits based on agreements in place prior to the sunset. Unused credit amounts due to insufficient tax liability may be used in later years, for up to five years. A taxpayer who made a donation in the year of the sunset, 2013, may carry forward unused amounts through tax year 2018. Generally, the contribution had to be made in tax years

beginning before January 1, 2014, to qualify for the credit. However, if a written contract or agreement for donating money for scientific or engineering research was agreed upon before January 1, 2014, but the donation was given after that date, the credit is still allowed.

A credit against income taxes was allowed for contributions of any of the following to an institution of higher education, a postsecondary school, or a public school (grades K-12) in Oregon:

- Computers and scientific equipment
- An agreement for maintenance of the computers and scientific equipment
- Money given by contract or agreement for scientific or engineering research.

The credit was equal to 10 percent of the fair market value of the contribution donated. This credit is in lieu of any deduction based on the contribution. For S corporations that claim the credit, the credit is shared by the S corporation shareholders and claimed against their Oregon personal income tax.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. Presumably, the purpose was to encourage donations of computers and scientific equipment to educational institutions.

WHO BENEFITS

Very few taxpayers benefit from this credit.

EVALUATION

Not evaluated.

1.403 OPPORTUNITY GRANT FUND CONTRIBUTIONS

Oregon Statute: 315.643

Sunset Date: 12-31-2022

Year Enacted: 2018

Carryforward: 3 years

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available*	Not Available*	Not Available*
2025-27	Not Available*	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer, but could at a later date.

DESCRIPTION

The Opportunity Grant Fund Contributions credit expired as of December 31, 2022; however, there are revenue impacts for the 2023-25 and 2025-27 biennia due to unused tax credits carried forward to succeeding years. The last possible year to claim this credit is the tax year beginning before January 1, 2026. A credit against corporation or personal income taxes was available to taxpayers who purchase tax credits from an auction conducted by the Department of Revenue (DOR), in cooperation with the Higher Education Coordinating Commission (HECC). The proceeds of the auction went to the Opportunity Grant Fund.

DOR administered the auction process and determined the minimum bid before conducting the auction, which could not be below 90 percent of the value of the credit. Legislation in 2019 (SB 459) decreased the requirement for the minimum bid from 95 percent of the value of the credit to 90 percent. It also required the auction to be conducted no later than April 15 following December 31 of any tax year for which the credit was allowed. Legislation in 2021 (HB 2456) allowed taxpayers to either claim the credit for the tax year in which they participated in the auction or for the prior tax year, as long as they had not yet filed a tax return for the prior year. Legislation in 2023 (SB 129) sunset the Opportunity Grant Fund Contributions credit for tax years beginning on or after January 1, 2023 and allowed taxpayers to claim the credit for tax year 2023 if a taxpayer purchased credit at auction conducted on or after January 1, 2023, and before March 1, 2023. The final auction was held in February of 2023.

There was no maximum credit per taxpayer, but there was a \$14 million limit on the total amount of credits that can be issued annually.

The tax credit was not transferable. The amount each taxpayer claimed in any one year could not exceed the tax liability of that taxpayer for that year. Any tax credit not used in a particular year because of insufficient tax liability could be carried forward for up to three years. A nonresident or part-year resident taxpayer could claim the credit in full, without proration.

PURPOSE

According to the revenue impact statement for SB 1528 (2018), the purpose of the credit was to “establish an additional funding source to be used to support the Oregon Opportunity Grant program thereby expanding support to Oregon higher education students in need of financial assistance.”

WHO BENEFITS

Taxpayers with a tax liability who purchased tax credits in an auction, proceeds of which funded the Opportunity Grant Fund. At the final auctions in December 2022 and February 2023, about 140 taxpayers paid \$13.2 million for tax credits with a total value of \$13.8 million. According to the HECC website, more than 30,000 college students receive Opportunity Grants each year.

EVALUATION

Not evaluated.

1.404 EMPLOYEE TRAINING

Oregon Statute: 315.523

Sunset Date: 12-31-2022 (see description)

Year Enacted: 2017

Carryforward: 3 years

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The Employee Training credit expired as of December 31, 2022; however, there are revenue impacts for the 2023-25 and 2025-27 biennia due to unused tax credits carried forward to succeeding years. A credit was allowed against personal or corporation income taxes to a taxpayer who was located in a qualifying county and who established and implemented an employee training program in collaboration with a local community college. The credit allowed was 12 percent of the taxpayer’s expenses to establish and implement the training program. The amount each taxpayer claimed in any one year could not exceed the tax liability of that taxpayer for that year. If the credit exceeded the employer’s tax liability, the excess could be carried forward up to three years.

Only Klamath County was a qualifying county, which was defined as one with population greater than 60,000 but less than 80,000 that:

- was located entirely outside of the Portland Metropolitan Area Regional Urban Growth Boundary (UGB) and UGBs of cities with more than 30,000 in population
- had an annual economic development budget of \$500,000 or greater
- had an unemployment rate at least 1.5 percentage points greater than the comparable statewide unemployment rate
- was party to an agreement with an institute of higher education to coordinate efforts to promote enterprise throughout the county

- was the site of a base or installation of the Armed Forces of the United States that employed at least 750 civilian and military personnel, and
- had access to internet service with the minimum connection speed required to effectively conduct electronic commerce.

Because the legislation enacting this statute did not explicitly provide a period of applicability for this tax expenditure, ORS 315.037(2) established that this tax credit shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year is 2022 with carryforward available through 2025.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. Presumably, the purpose was to encourage employers to collaborate with community colleges to offer employee training programs.

WHO BENEFITS

Individuals or businesses implementing employee training programs in qualified counties. Very few taxpayers benefited from this credit.

EVALUATION

Not evaluated.

1.405 CONTRIBUTIONS TO 529 ACCOUNT

Oregon Statute: 315.650

Sunset Date: 12-31-2029

Year Enacted: 2019

Carryforward: No

Refundable: Yes

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$17,600,000	\$17,600,000
2025-27	Not Applicable	\$17,600,000	\$17,600,000

NOTE: The revenue impact estimate includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers.

DESCRIPTION

A credit may be claimed against personal income taxes for contributions made to an Oregon 529 College Savings Network account for higher education. The amount of the credit allowed is limited based on the taxpayer's adjusted gross income (AGI) and is the lesser of \$180 (\$360 for a joint return) in 2024, adjusted annually for inflation, or the following:

AGI Limit	Credit Amount
Less than \$30,000	100% of contribution
\$30,000 to \$70,000	50% of contribution
\$70,000 to \$100,000	25% of contribution
\$100,000 to \$250,000	10% of contribution
\$250,000 or more	5% of contribution

The credit is refundable. To the extent that the credit exceeds a taxpayer's liability (reduced by any nonrefundable credits), the taxpayer receives a payment for the excess.

The proceeds of Oregon 529 College Savings Network accounts are meant to be used to pay higher education related expenses for a designated beneficiary. Total contributions to these accounts are allowed up to the amount necessary to cover the qualified higher education expenses of the beneficiary or limits specified by the Oregon 529 Savings Board.

The revenue impact above includes only the impact of the state allowed credit for contributions. Under federal law, contributions to these accounts are not tax deductible. However, earnings on contributions and qualifying distributions from the accounts are excluded from federal tax. The revenue impact and complete description of federal tax benefits

applicable to Oregon 529 College Savings Network accounts are detailed in tax expenditure 1.002, [Qualified Education Savings \(Federal\)](#).

This credit replaces the corresponding subtraction, [1.301, Oregon 529 College Savings Network](#), which sunset December 31, 2019.

Legislation in 2023 (HB 2071) extended the scheduled sunset of the provision from December 31, 2025 to December 31, 2029.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the revenue impact statement for HB 2164 (2019), the purpose is “to provide families and individuals a tool with which to begin saving for higher education expenses thereby encouraging individuals to commit to continuing their education beyond high school. Policy intent of restructuring tax subtraction as a refundable credit is to make tax incentive more available to families and individuals of more modest means.”

WHO BENEFITS

The table below shows usage of this credit for tax year 2022:

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	1,030	\$180	\$0.2	2%
\$19,400 - \$40,400	930	\$190	\$0.2	2%
\$40,400 - \$67,700	2,150	\$190	\$0.4	5%
\$67,700 - \$117,800	7,200	\$180	\$1.3	15%
Above \$117,800	30,170	\$210	\$6.5	76%
All Full-Year Filers	41,470	\$210	\$8.5	100%
Part-Year and Nonresident Filers	1,260	\$110	\$0.1	

**Each income group contains 20 percent of the full-year filers (approximately 376,000)*

Since this is a refundable credit, the full amount of credits claimed can be used, even if the taxpayer has little or no tax liability. Of the approximately \$8.6 million claimed for 2022, \$8.3 million was used to reduce tax liability, while the remaining \$0.3 million exceeded tax liability and was paid directly to taxpayers.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure is a fiscally effective method of achieving its purpose, which is to reduce the cost of higher education. With more than one-third of Oregon students having estimated resources that do not cover their cost of attendance, even after accounting for family and financial aid contributions, this allows families to save ahead to meet educational expenses. This is particularly important going forward as the fastest growing component of the cost of attendance is housing and related costs, which these contributions can be used to pay for. The greatest revenue impact occurs for families with higher incomes, and this is consistent with HECC analysis showing that families’ and students’ contributions cover nearly all of the cost of attendance for students from middle and higher income backgrounds.

1.406 EARNED INCOME CREDIT

Oregon Statute: 315.266

Sunset Date: 12-31-2025

Year Enacted: 1997

Carryforward: No

Refundable: Yes

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$106,000,000	\$106,000,000
2025-27	Not Applicable	\$54,300,000	\$54,300,000

NOTE: The revenue impact estimate includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers. The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

Taxpayers eligible for the federal earned income tax credit (EITC), a refundable federal income tax credit for low-income working individuals and families, may claim an Oregon income tax credit equal to 9 percent of the federal credit. For taxpayers with at least one dependent under the age of three, the Oregon income tax credit increases to 12 percent of the federal EITC. Legislation in 2021 (HB 2433) expanded qualification for the credit starting in tax year 2022 by allowing resident and nonresident individuals to claim the credit using their Individual Taxpayer Identification Number (ITIN) in lieu of a Social Security Number, as required for the federal credit. To determine the amount of their Oregon credit, these taxpayers compute the amount of federal EITC they would qualify for but for the ITIN limitation and multiply that amount by the appropriate Oregon credit rate (9 percent or 12 percent).

Like the federal credit, the Oregon tax credit is also a refundable credit. To the extent that the state credit exceeds a taxpayer's liability (reduced by any nonrefundable credits), the taxpayer receives a payment for the excess.

The federal EITC varies based on a taxpayer's "earned" income (generally wages and certain types of self-employment income). Specifically, the federal EITC equals a fixed percentage of earned income until reaching a maximum amount. The credit then remains at this maximum amount over a subsequent range of earned income. The credit then decreases with earned income until the point when the credit becomes zero for incomes above a certain threshold. The income breakpoints and maximum credit depend on filing status and number of qualifying children. For tax year 2024, the maximum federal EITC for a taxpayer without children is \$632. In contrast, the maximum credit for a taxpayer with one child is \$4,213, with two children is \$6,960, and with three or more children is \$7,830. For married filing jointly taxpayers with three or more children, they cannot claim the credit if they have an adjusted gross income above \$66,819. For single taxpayers and taxpayers with two or fewer children the threshold income is less.

At inception, the Oregon credit was 5 percent of the federal earned income tax credit. In 2006, the Oregon credit became refundable. In 2008, the Oregon credit increased to 6 percent of the federal credit and further increased to 8 percent in 2014. Beginning with tax year 2017, the Oregon credit increased to 11 percent of the federal credit for taxpayers with a dependent under the age of three. Legislation in 2019 (HB 2164) increased the Oregon credit from 8 percent to 9 percent of the federal credit and, for taxpayers with a dependent under the age of three, from 11 percent to 12 percent. The same legislation extended the scheduled sunset of the Oregon earned income credit to December 31, 2025.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of the credit is "to increase the spendable income of low-income working families by offsetting state income taxes, thereby encouraging low wage earners to enter the labor force or earn more if already part of the labor force." The legislative staff revenue impact statement for HB 2433 stated that the purpose of the expansion was "to make the earned income tax credit more equitable by eliminating the distinction between taxpayers filing with a Social Security Number and those filing with an Individual Taxpayer Identification Number."

WHO BENEFITS

The table below shows usage of this credit for tax year 2022, including filers using an ITIN to claim the credit.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	107,050	\$160	\$16.8	39%
\$19,400 - \$40,400	72,200	\$320	\$22.9	53%
\$40,400 - \$67,700	27,590	\$120	\$3.3	8%
\$67,700 - \$117,800	0	\$0	\$0.0	0%
Above \$117,800	0	\$0	\$0.0	0%
All Full-Year Filers	206,840	\$210	\$43.0	100%
Part-Year and Nonresident Filers	23,070	\$130	\$2.9	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

Since this is a refundable credit, the full amount of credits claimed can be used, even if the taxpayer has little or no tax liability. Of the approximately \$45.9 million claimed for 2022, \$25.8 million was used to reduce tax liability, while the remaining \$20.1 million exceeded tax liability and was paid directly to taxpayers.

EVALUATION

Provided by the Oregon Department of Human Services

Research has shown that providing cash to families can reduce the number of children living in poverty. A study from the U.S. Department of Health and Human Services found that children living in poverty are at seven times higher risk for neglect, three times higher risk for physical abuse and two times higher risk for sexual abuse. By giving cash refunds to families, the federal Earned Income Tax Credit (EITC) and Oregon (EIC) can reduce a family's chance of entering the child welfare system by reducing the risk of neglect and abuse.

Together, the EITC and the Oregon EIC can be a significant support to families, but many Oregonians don't receive it because they do not file a return. The IRS estimates that for tax year 2020, Oregon had the lowest EITC participation rate of eligible residents compared to other states. Roughly one out of every three eligible residents did not file for the EITC and thus did not receive either the federal or the state credit for 2020. Filing for 2020 occurred in early 2021 at the height of the pandemic, so a low rate of participation is to be expected, but Oregon has consistently been in the bottom half of the country for EITC uptake every year.

Electronic filing virtually ensures that taxpayers receive the tax credits that they are eligible for when they file. Lack of access to technology, questions about tax forms and rules, fear of making a mistake and the inability to afford tax preparation assistance prevent many Oregonians from filing. Access to free tax preparation assistance is critical to ensuring that Oregonians receive valuable tax credits like the Oregon EIC.

1.407 CHILD WITH A DISABILITY

Oregon Statute: 316.099(3)

Sunset Date: 12-31-2027

Year Enacted: 1985

Carryforward: No

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$8,700,000	\$8,700,000
2025-27	Not Applicable	\$8,700,000	\$8,700,000

DESCRIPTION

For taxpayers with adjusted gross income that does not exceed \$100,000, an additional exemption credit is allowed for each qualifying dependent child who is disabled. The adjusted gross income limits are not adjusted for inflation. The amount of the exemption credit (and hence the child with a disability credit) is indexed each year to account for

inflation and is prorated for nonresidents and part-year residents. The credit is \$249 in 2024. This credit is in addition to [1.443, Personal Exemption](#).

“Child with a disability” is defined in statute as a dependent child who is eligible for early intervention services, or who is diagnosed for special education purposes as being intellectually disabled, multi-disabled, visually impaired, hearing impaired, deaf-blind, orthopedically impaired, other health impaired, or as having autism, emotional disturbance or traumatic brain injury, in accordance with State Board of Education rules.

Use of this program has been expanded by the federal Americans with Disabilities Act, as well as a tax court decision allowing the credit for nonresident dependents diagnosed and educated in other states.

Prior to 2013, there were no adjusted gross income limits for the additional personal exemption credit for a dependent child with a qualifying disability. In 2013, the Legislature eliminated all personal exemption credits, including any credit claimed for a child with a disability, for joint filers with adjusted gross income above \$200,000, and for single filers with adjusted gross income above \$100,000. In 2014, the Legislature reinstated the additional personal exemption credits for dependent disabled children for high income taxpayers, retroactive to tax year 2013, but in 2015 (HB 2171) limited this credit to taxpayers with adjusted gross income that does not exceed \$100,000 regardless of filing status.

Legislation in 2021 (HB 2433) extended the sunset of the credit for a child with a disability to December 31, 2027.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2433 (2021) the purpose is, “to provide financial relief and offset costs associated with a child’s disability.”

WHO BENEFITS

The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	3,160	\$30	\$0.1	3%
\$19,400 - \$40,400	4,710	\$220	\$1.1	30%
\$40,400 - \$67,700	5,130	\$260	\$1.3	38%
\$67,700 - \$117,800	3,850	\$260	\$1.0	29%
Above \$117,800	0	\$0	\$0.0	0%
All Full-Year Filers	16,850	\$210	\$3.5	100%
Part-Year and Nonresident Filers	1,230	\$120	\$0.1	

**Each income group contains 20 percent of the full-year filers (approximately 376,000)*

EVALUATION

Provided by the Oregon Department of Human Services

This tax expenditure achieves its purpose and is of greatest assistance to those people who are at the margin of needing state assistance. It allows for greater disposable income to meet the more costly needs of children with disabilities. This tax expenditure is well targeted and provides the recipients with valuable financial assistance that alleviates or prevents the reliance on direct state services. As a result, this tax credit saves the state more than it costs.

1.408 RURAL MEDICAL PRACTICE

Oregon Statute: 315.613, 315.616, and 315.619
Sunset Date: 12-31-2027 (new); 01-01-2037 (continuing)
Year Enacted: 1989

Carryforward: No
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$11,800,000	\$11,800,000
2025-27	Not Applicable	\$11,000,000	\$11,000,000

DESCRIPTION

A nonrefundable credit of up to \$5,000 against personal income taxes is allowed to certain rural medical providers. Eligible providers include physicians, dentists, podiatrists, optometrists, physician associates, certified registered nurse anesthetists, and nurse practitioners. Providers must be certified by the Office of Rural Health.

To qualify, providers must care for patients in a qualifying rural area for at least 20 hours per week, averaged over the month. They must also be willing to serve patients with Medicare coverage and patients receiving medical assistance in at least the same proportion as the proportion of Medicare and medical assistance populations in the county where they practice, up to 20 percent for Medicare patients or 15 percent for medical assistance patients. Other requirements for eligibility vary by type of provider.

The tax credit amount is based on the distance a provider's practice or hospital membership is from a major population center of 40,000 or more:

- If at least 10 miles but fewer than 20 miles, \$3,000
- If at least 20 miles but fewer than 50 miles, \$4,000
- If 50 or more miles, \$5,000.

Currently, there are seven such major population centers in Oregon: the Portland area, Salem, Eugene/Springfield, Medford, Grants Pass, Bend, and Corvallis/Albany.

The total credit amount awarded by the Office of Rural Health is based on the distances outlined above and the number of months during the year that the practitioner maintains the rural practice. If the practice is maintained for fewer than 12 months, the Office of Rural Health prorates the credit accordingly. For nonresidents and part-year residents, the credit is also prorated.

Legislation in 2017 (HB 2066) placed an income cap on those eligible for the credit. Starting with tax year 2018, only taxpayers with income less than \$300,000 qualify for the credit. Exempted from the income cap, however, are physicians who practice as general surgeons, specialize in obstetrics, or specialize in family or general practice and also provide obstetrical services. In 2021 (HB 2433), legislation expanded the income cap exemption to also include physicians who specialize in family or general practice and also practice emergency medicine in a county that is a frontier rural practice county.

Legislation in 2017 also added a lifetime 10-year limit starting on or after tax year 2018.

Legislation in 2019 (HB 2847) expanded the categories of hospitals in which practicing medical providers can qualify for the credit, including rural referral centers and sole community hospitals as defined by the Centers for Medicare and Medicaid Services. According to the revenue impact statement prepared by staff for this legislation, the expansion was intended to include the Sky Lakes Medical Center in Klamath Falls as a qualifying hospital.

Legislation in 2021 (HB 2433) extended the sunset for this tax credit to December 31, 2027. Providers who are eligible for the credit in 2027 may claim the credit for any tax year that begins on or before January 1, 2037.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. According to the revenue impact statement prepared by legislative staff for HB 2433 (2021), "the policy purpose of this credit is to support the recruitment and retention of certain medical professionals in rural areas, thereby improving access in rural areas to such health care providers."

WHO BENEFITS

Medical professionals who qualify for this tax credit. For the 2023 tax year, nearly 1,900 practitioners were certified by the Office of Rural Health for the credit. The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	<10	\$20	<\$0.1	<1%
\$19,400 - \$40,400	<10	\$880	<\$0.1	<1%
\$40,400 - \$67,700	30	\$2,550	<\$0.1	<1%
\$67,700 - \$117,800	140	\$3,850	\$0.5	9%
Above \$117,800	1,230	\$4,220	\$5.2	90%
All Full-Year Filers	1,400	\$4,110	\$5.8	100%
Part-Year and Nonresident Filers	190	\$2,290	\$0.4	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Office of Rural Health

This tax credit was created to attract and retain practitioners in rural and frontier Oregon, thereby improving access to care for rural Oregonians. Past surveys conducted by the Office of Rural Health (ORH) indicate that rural practitioners value the tax credit more as a retention tool than a recruitment tool. A 2016 study mandated by HB 3396 (2015) examined a subset of tax credit recipients - those who are also National Health Service Corps (NHSC) providers. That study found that 67.5 percent of primary care NHSC providers who also received the tax credit continued to practice in primary care HPSA areas in Oregon one year after completion of their NHSC obligation, while the retention rate for primary NHSC providers who did not receive the tax credit was 61.4 percent. The difference in the retention rates two years after the completion of NHSC obligation is even greater: 53.6 percent among tax credit recipients versus 43.3 percent among non-recipients. ORH administers one state (Oregon Health Care Provider Loan Repayment) and one additional federal loan (Oregon Partnership Loan Repayment) repayment program to increase recruitment to rural and frontier communities. The tax credit program works in conjunction with these programs to retain providers beyond service obligations. In tax year 2023, ORH certified 1,898 providers as eligible for the tax credit. Of those, 604 were MDs, 117 DOs, 601 NPs, and 414 PAs.

1.409 VOLUNTEER RURAL EMERGENCY MEDICAL PROVIDERS

Oregon Statute: 315.622
Sunset Date: 12-31-2027
Year Enacted: 2005

Carryforward: No
Refundable: No
Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$100,000	\$100,000
2025-27	Not Applicable	\$100,000	\$100,000

DESCRIPTION

A nonrefundable credit of \$250 (not adjusted for inflation) against personal income taxes is allowed to certain rural emergency medical service providers certified by the Office of Rural Health. They cannot carry forward any unused portion. The amount of the credit is prorated for nonresidents and part-year residents. To receive the credit, at least 20 percent of the services provided by the emergency medical service provider must be volunteer hours spent in a qualifying rural area. For this provision, rural means any area at least 25 miles from a city with a population of 30,000 or more. Two joint personal income taxpayers can each qualify for and claim the credit for a total of \$500 per return, if applicable.

Legislation in 2023 (HB 2071) extended the scheduled sunset of the provision from December 31, 2025 to December 31, 2027.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose is “To help defray the out of pocket costs of rural volunteer providers of emergency medical services.”

WHO BENEFITS

Certified emergency medical providers who volunteer at least 20 percent of their services in rural areas.

For tax year 2022, over 200 personal income tax filers saved an average of about \$250 using this credit.

EVALUATION

Provided by the Office of Rural Health

Rural volunteer EMTs must pay for the cost of training and certification out of their own pockets, which has made the recruitment and retention of rural volunteer EMTs difficult. The EMT Tax Credit program was designed to assist rural volunteer EMTs by offsetting those costs and increasing the retention of trained health care professionals. While the Office of Rural Health has not done a formal evaluation of this program, the office does believe it is an effective program and should be continued. For tax years 2022 and 2023, respectively, the Office of Rural Health certified 350 and 321 rural, volunteer EMTs for this tax credit.

1.410 SEVERE DISABILITY

Oregon Statute: 316.758

Sunset Date: 12-31-2027

Year Enacted: 1985

Carryforward: No

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$7,800,000	\$7,800,000
2025-27	Not Applicable	\$7,800,000	\$7,800,000

DESCRIPTION

An exemption credit is allowed for nondependent taxpayers with severe disabilities and federal adjusted gross income that does not exceed \$100,000. Two exemptions may be claimed on a joint return if both spouses qualify. The adjusted gross income limit is not adjusted for inflation. The amount of the exemption credit (and hence the severe disability credit) is indexed each year to account for inflation and is prorated for nonresidents and part-year residents. The credit is \$249 in 2024. This credit is in addition to [1.443, Personal Exemption](#).

Severe disability is defined by any of the following:

- The loss of use of one or more lower extremities
- The loss of use of both hands
- Permanent blindness
- A physical or mental condition that limits the abilities of the person to earn a living, maintain a household, or provide personal transportation without employing special orthopedic or medical equipment or outside help.

Legislation enacted in 2021 (HB 2433) extended this credit's sunset, stating that the credit may not be claimed for tax years beginning after December 31, 2027.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2433 (2021), the purpose of this credit is “... provide financial relief and offset costs associated with a taxpayer’s disability.”

WHO BENEFITS

The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	9,890	\$50	\$0.5	15%
\$19,400 - \$40,400	6,110	\$160	\$1.0	27%
\$40,400 - \$67,700	5,620	\$190	\$1.1	30%
\$67,700 - \$117,800	4,710	\$210	\$1.0	27%
Above \$117,800	0	\$0	\$0.0	0%
All Full-Year Filers	26,330	\$140	\$3.6	100%
Part-Year and Nonresident Filers	1,810	\$90	\$0.2	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Department of Human Services

This tax expenditure appears to achieve its purpose. It increases disposable income for eligible individuals. While a tax credit is clearly beneficial, there is a concern that those who qualify for this credit may not earn sufficient income to fully utilize it.

1.411 CONTRIBUTIONS TO ABLE ACCOUNT

Oregon Statute: 315.650
Sunset Date: 12-31-2029
Year Enacted: 2019

Carryforward: No
Refundable: Yes
Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$600,000	\$600,000
2025-27	Not Applicable	\$600,000	\$600,000

NOTE: The revenue impact estimate includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers.

DESCRIPTION

A credit may be claimed against personal income taxes for contributions made to an Oregon ABLE (Achieving a Better Life Experience) account. The amount of the credit allowed is limited based on the taxpayer's adjusted gross income (AGI) and is the lesser of \$180 (\$360 for a joint return) for 2024, adjusted annually for inflation, or the following:

AGI Limit	Credit Amount
Less than \$30,000	100% of contribution
\$30,000 to \$70,000	50% of contribution
\$70,000 to \$100,000	25% of contribution
\$100,000 to \$250,000	10% of contribution
\$250,000 or more	5% of contribution

The credit is a refundable credit. To the extent that the credit exceeds a taxpayer's liability (reduced by any nonrefundable credits), the taxpayer receives a payment for the excess.

The proceeds of Oregon ABLE accounts are meant to be used to pay qualified disability expenses of the designated beneficiary, including education, housing, transportation, employment training and support, health care, and financial management. Individuals diagnosed with a disability before the age of 26 (age 46 after 2025) are eligible for an Oregon ABLE Savings Plan account. Up to \$100,000 can be saved within an ABLE account without the assets affecting federal and state benefits, and up to the gift tax exemption limit (\$18,000 in 2024) can be contributed annually.

In addition, the 2017 Tax Cuts and Jobs Act (TCJA) temporarily increased the allowable contribution for tax years 2018 through 2025. Above and beyond the standard annual contribution limit mentioned previously, an eligible employed designated beneficiary is allowed to contribute an additional amount up to the lower of the prior year's poverty level for a household of one or the beneficiary's compensation in the tax year.

The revenue impact above includes only the impact of the state-allowed credit for contributions. Under federal law, contributions to these accounts are not tax deductible. However, qualifying distributions and earnings on contributions are excluded from federal and state taxable income. The Joint Committee on Taxation considers the federal tax expenditure to be quantitatively *de minimis*. As such, the federal tax expenditure is listed in the "Other Federal Provisions" section of this report.

This credit replaces the corresponding subtraction, [1.306, ABLE Account Contributions](#), which sunset December 31, 2019.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose is "to help people with disabilities to save money for necessary expenses to meet the challenges of life."

WHO BENEFITS

The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	580	\$150	<\$0.1	37%
\$19,400 - \$40,400	120	\$150	<\$0.1	8%
\$40,400 - \$67,700	90	\$170	<\$0.1	7%
\$67,700 - \$117,800	180	\$190	<\$0.1	15%
Above \$117,800	370	\$220	<\$0.1	34%
All Full-Year Filers	1,340	\$180	\$0.2	100%
Part-Year and Nonresident Filers	40	\$140	<\$0.1	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Department of Human Services

Oregon ABLE is incredibly important for people with disabilities to be able to save money for unexpected expenses, long-term expenses such as a down payment on a vehicle, or home, etc. Currently, with federal requirements to remain connected to Social Security or Medicaid (critical to access health and safety services such as attendant care, medical, etc.) a person with a disability can only save up to \$2,000 *at a time*. Meaning, once they save \$2,000 to go towards unexpected expenses, a home, etc. they must immediately stop saving because excess of that will put them at risk of losing benefits. This makes it nearly impossible for people with disabilities to live as independently as possible, or step down from Medicaid services. As noted above, ABLE allows individuals to save more, which makes investing (like anyone else in Oregon) possible. The tax benefit allows individuals, parents, grandparents, etc. to contribute for their children, as well. Overall, this program has changed lives and expectations for people with disabilities in Oregon and should continue.

1.412 OREGON KIDS CREDIT

Oregon Statute: 315.273
Sunset Date: 12-31-2028
Year Enacted: 2023 (HB 3235)

Carryforward: No
Refundable: Yes
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$78,100,000	\$78,100,000
2025-27	Not Applicable	\$79,600,000	\$79,600,000

NOTE: The revenue impact estimate includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers.

DESCRIPTION

As of tax year 2023, a refundable personal income tax credit is allowed for low-income families with qualifying children and modified adjusted gross income below \$30,000. Modified adjusted gross income is Oregon income after additions and subtractions plus any losses deducted on the federal return that exceed \$20,000. The tax credit is equal to \$1,000 per qualifying child under the age of six at the close of the tax year. The number of qualifying children is limited to no more than five per taxpayer. The credit phases out proportionally for taxpayers with qualifying income between \$25,000 and \$30,000. Starting with tax year 2024, the phaseout thresholds and credit amount will be adjusted for inflation. The credit cannot be claimed by taxpayers filing as married filing separately. The amount of the credit is prorated for nonresidents and part-year residents.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 3235 (2023), the purpose "is to decrease childhood poverty in Oregon, understanding that early childhood investments can be particularly effective in increasing the lifetime well-being of an individual."

WHO BENEFITS

Low-income taxpayers with qualifying children under age six.

EVALUATION

Provided by the Oregon Department of Human Services

This is a new credit that is available to very low-income families. In fact, the credit is available even if the taxpayer has no taxable income. It is also available to families who are not eligible for a Social Security Number because of their immigration status. Data pulled from the Oregon Health Plan database estimates that about 80,000 families were eligible for this credit in tax year 2023. To date, only about half of those families, filed and received the credit.

The dollar value of this credit is high and significantly impacts the financial position of eligible families, particularly when the credit supplements the EITC, the Oregon EIC and the Child Tax Credit. Sometimes, however, the taxpayer's income is so low that they are not eligible for the Child Tax Credit, or they don't have earned income for the EITC, so this is only credit they receive. This general applicability generously fills some gaps in the tax code that otherwise exclude needy families.

Unfortunately, many of the families that are eligible to receive the credit do not file tax returns, either because they do not have a filing requirement or because they need assistance to obtain an Individual Taxpayer Identification Number (ITIN) from the IRS in order to file. And for those families that do file, they often pay a provider \$400 to file their return, reducing the full benefit of the credit. Access to free tax preparation assistance statewide is critical to ensuring that the full amount of this important and valuable credit reaches all eligible families.

1.413 FARMWORKER HOUSING LENDER'S CREDIT

Oregon Statute: 317.147
Sunset Date: 12-31-2013
Year Enacted: 1989

Carryforward: No
Refundable: No
Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	\$0	\$0	\$0

DESCRIPTION

The farmworker housing lender's credit expired as of December 31, 2013; however, there can be revenue impact for the 2023–25 biennium due to possible tax credits being claimed for up to a ten-year period. The last possible year to claim this credit is the tax year beginning before January 1, 2024. A credit against corporation income taxes was allowed for lending institutions financing construction or rehabilitation of farmworker housing projects. The credit equaled 50 percent of the interest income earned during the year on loans to finance the direct costs associated with constructing or rehabilitating farmworker housing. For S corporations that claimed the credit, the credit was shared by the S corporation shareholders and claimed against their Oregon personal income tax.

The lender must have received certification from the borrower that upon completion the project will comply with all health and safety standards. The housing must have been located in Oregon and the interest rate on the loan cannot have been above 13.5 percent. The credit could be claimed over the term of the loan or for ten years, whichever was less, and applied to the loans made on or after January 1, 1990.

If a lending institution sold a qualifying loan, the right to claim the credit was passed on to the buyer provided the same conditions were offered to the borrower. The selling bank retained the right to claim the credit if it continued to service the loan.

PURPOSE

The statute that allowed this expenditure does not explicitly state a purpose. Presumably, the purpose was to promote construction and rehabilitation of safe and healthful housing for farm workers.

WHO BENEFITS

Very few taxpayers benefit from the credit.

EVALUATION

Not evaluated.

1.414 AGRICULTURE WORKFORCE HOUSING CONSTRUCTION

Oregon Statute: 315.164
Sunset Date: 12-31-2031
Year Enacted: 1989

Carryforward: 9 years
Refundable: No
Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$5,500,000	\$1,800,000	\$7,300,000
2025-27	\$7,100,000	\$2,900,000	\$10,000,000

DESCRIPTION

A credit against corporation or personal income taxes is allowed for construction, rehabilitation, or acquisition of agriculture workforce housing in Oregon. The credit is 50 percent of the eligible costs for housing projects and may be taken for the tax year in which the project is completed or in any of the nine tax years succeeding the tax year in which the project is completed. The maximum allowable credit claimed by a taxpayer for any one tax year cannot exceed 20 percent of the total allowable credit. Taxpayer eligibility for the credit is determined by Oregon Housing and Community Services Department (OHCS).

Legislation in 2021 (HB 2433) increased the existing limit on eligible agriculture workforce housing construction tax credits from \$7.25 million to no more than \$16.75 million in total potential credits claimed per biennium, effective July 1, 2021.

The agriculture workforce housing must meet certain qualifications for the taxpayer to be eligible for the credit. Rehabilitation projects must restore housing to a condition that meets building code requirements. Agriculture workforce housing must also be registered, if required, as an agriculture workforce camp with the Department of Consumer and Business Services. The housing units for which the credit is being claimed must be occupied by agricultural workers.

Any portion of the credit allowed in a given tax year exceeding the taxpayer's tax liability may be carried forward for up to nine years. A taxpayer eligible to claim the credit may transfer the entire amount of the credit to another taxpayer who contributed to the project. In the case of a transfer, the credit is still taken for the tax year in which the project is completed or in any of the nine tax years succeeding the tax year in which the project is completed.

Legislation in 2023 (HB 2071) extended the sunset of this tax credit program to December 31, 2031. A credit may not be claimed for agriculture workforce housing projects completed in tax years beginning on or after January 1, 2032.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of this credit is "to provide support for the construction or rehabilitation of agriculture workforce housing thereby supporting the goal of ensuring adequate agricultural labor housing through a collaboration of the public, private, and nonprofit sectors."

WHO BENEFITS

For tax year 2022, 18 personal income taxpayers (including S corporation taxpayers) saved on average \$15,000 in Oregon tax using this credit. For tax year 2021, 13 corporate taxpayers saved on average almost \$185,000 in Oregon tax using this credit.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves the purpose of promoting construction and rehabilitation of safe and healthy housing for agriculture workers. Recent progress in developing adequate housing for Oregon's agriculture worker population is due in large part to the availability of the agriculture worker housing development tax credits. If the tax expenditure were eliminated, financing of community based agriculture worker housing would be impeded and a primary incentive to improve or construct onsite housing would be eliminated. Major supporters of better agriculture worker housing include migrant health clinics that see the effects of unsanitary conditions. This concern has only become more present in light of the COVID-19 pandemic.

The availability of agriculture worker housing enhances the health of Oregon's agricultural industry, benefiting workers and growers alike. This industry must compete on a regional, national, and international basis for its labor force. It can be argued that to remain competitive in this market, Oregon must continue its efforts to improve the supply of decent and affordable housing for its farm labor force. Because agriculture is a major Oregon industry, with gross sales totaling \$5.48 billion in 2012, and because crops dependent on the labor of agriculture workers account for over one-third of this amount, the impact on Oregon's economy is significant.

There are several direct spending programs, both at the state level and at the national level, that are used to develop affordable housing. This tax credit integrates well with these programs, since a chief factor in the award of funds under the other programs is the ability to match those funds. The availability of the agriculture worker tax credit allows Oregon to compete particularly well for federal dollars. Of significance are the USDA Rural Development 514 and 516 programs designated for agriculture worker housing. Before the advent of the agriculture worker housing development tax credit, Oregon's usage of U.S. Department of Agriculture labor housing fund was almost nonexistent.

1.415 FILM PRODUCTION DEVELOPMENT CONTRIBUTIONS

Oregon Statute: 315.514 and 315.516

Sunset Date: 12-31-2029

Year Enacted: 2003

Carryforward: 3 years

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available	Not Available	\$38,800,000
2025-27	Not Available	Not Available	\$38,800,000

DESCRIPTION

A credit against corporation or personal income taxes is available to taxpayers who purchase tax credits from an auction conducted by the Department of Revenue (DOR), in cooperation with the Oregon Film and Video Office (OFVO). The proceeds of the auction go to the Oregon Production Investment Fund (OPIF) and are used to reimburse qualifying filmmakers or local media production services companies for a portion of their Oregon expenses.

ORS 315.516 allows the Legislature to directly appropriate funds to the OPIF in lieu of holding an auction in a future fiscal year. In 2018, HB 4028 amended this statute to allow the Legislature to make this direct appropriation for the current fiscal year, for the difference between the credits sold at auction and the annual maximum, in the event that credits remain unsold when the auction ends.

DOR administers the auction process and determines the minimum bid before conducting the auction, which cannot be below 90 percent of the value of the credit. Legislation in 2019 (SB 459) decreased the requirement for the minimum bid from 95 percent of the value of the credit. It also allows auctions to be conducted up until April 15 following December 31 of any tax year for which the credit is allowed. Due to legislation in 2021 (HB 2456), taxpayers can now either claim the credit for the tax year in which they participated in the auction or for the prior tax year, as long as they have not yet filed a tax return for the prior year.

There is no maximum credit per taxpayer, but there is a limit on the total amount of credits that can be issued annually. In 2021, the Legislature extended the sunset to December 31, 2029 and increased the annual credit limit from \$14 million to \$20 million (HB 2433).

The tax credit is not transferable, and any tax credit not used in a particular year because of insufficient tax liability may be carried forward for up to three years. A nonresident or part-year resident taxpayer can claim the credit in full, without proration. If the amount paid for the tax credits is claimed as a deduction for federal tax purposes, the amount paid is added to federal taxable income for Oregon tax purposes to claim the credit.

PURPOSE

“Provide the necessary financial incentives for taxpayers to make contributions ...” to the Oregon Production Investment Fund (ORS 315.514(2)(b)(C)). According to the revenue impact statement for HB 2433, the purpose of the Oregon Production Investment Fund is to “(encourage) film and video production in Oregon and (strengthen) Oregon’s film and video industry infrastructure by bringing in more production spending.”

WHO BENEFITS

Taxpayers with a tax liability who purchase tax credits in an auction, whose proceeds fund the Oregon Production Investment Fund. At the most recent auction in September of 2023, about 70 taxpayers paid more than \$18.9 million for tax credits with a total value of \$20 million.

Typically, very few corporations claim this credit each year.

EVALUATION

Provided by the Oregon Film and Video Office

This tax expenditure achieves its purpose of retaining and recruiting film production in the state and generating associated spending and employment. Without this program, there would undoubtedly be a drop in activity for Oregon's film, television, and commercial industry due to the high competition of state incentive programs in the US and Canada. This is an industry that provides jobs, small business spending and on-going media marketing value for the

state. Oregon is a competitive destination for creative media production because of OPIF and the Greenlight Oregon Labor Rebate Program.

The Oregon Production Investment Fund (OPIF) has been integral in Oregon's ability to compete with the more than 30 other U.S. states that offer production incentives. OPIF (in conjunction with Greenlight Oregon Labor Rebate Fund, "GOLRF") is directly responsible for the \$285 million of direct film, television, media, and commercial production spending that was recorded in the 2021-2023 biennium. Since the introduction of the OPIF in 2003, OFVO has tracked the economic activity directly attributed to the incentive programs rising from just over \$30 million for the 2005-2007 biennium, to now \$165 million per year, while the number of tracked jobs per biennium has climbed from just over 1200 in 2005-2007 to more than 7000 for 2021-2023. Feature films, television series, animated projects, interactive games, and countless commercial projects are being produced by local crews and producers accumulating more than \$2 billion of tracked in-state spending since the inception of the OPIF program.

The traditional "media industry" has changed rapidly and these programs have proven to be flexible and robust enough to keep up with that change. In recent years, Oregon has attracted projects not only from traditional studios like HBO, CBS, Warner Brothers, Disney, and NBC but also from the growing online programming industry with multiple projects from Netflix and Amazon. And a world class OSCAR winning animation industry based in Oregon.

In addition, the new "regional" incentive (R-OPIF) which was introduced in 2017 has quickly become a very useful tool for bringing production work to other parts of the state outside of the Portland metro area. Since its launch in July of 2017, we have seen production work grow in Bandon, Vernonia, Bend, Curry & Coos Counties, Astoria, Ashland, and Silverton resulting in more than \$3.6 million in localized hotel and accommodation spending in non-Portland regions. While the "Local" or L-OPIF program specifically supports lower budgeted, locally produced projects - from indie features to homegrown interactive games to animated shorts and documentary films.

This growing group of diverse programming is also very useful to marketing Oregon to the tourism industry. Releases of new films like the Paramount's "Little Wing" and series like HBO's "The Rehearsal" in addition to upcoming major releases like Netflix's "The Night Always Comes" based on Oregon author Willy Vlautin's book and the anticipated Amazon series "Criminal" push the Oregon brand to international audience on a regular basis through major distribution outlets. This is celebrated by the first-in-the-world Oregon Film Trail and 42 signs drawing tourists to iconic production locations like Brownsville, Joseph, Astoria and Klamath Falls.

All of the projects are being put together by local producers utilizing local crews and cast and renting and buying equipment and supplies from countless local vendors.

But it is the local animation community that is most consistently growing and deeply Oregon Made. "Guillermo Del Toro's Pinocchio" won an Oscar in 2022 while Laika is working on their next feature based on Portland author Colin Meloy's book "Wildwood" combine to make Oregon a major destination for animated projects due to its deeply artistic and diverse workforce.

OPIF has been integral to creating a balanced system that imports work into the state as much as creates work for established companies and individuals already here in the state providing jobs and direct spending in a wide variety of the state's vendors - from caterers to car rentals; from dry cleaning to security firms. On top of that, Oregon's media incentive programs are instrumental in making media work more competitive here in Oregon in a national landscape that includes many states offering better Film & Media incentive programs and creates a knock-on marketing platform for the state in numerous national and international audiences.

1.416 RENEWABLE RESOURCE EQUIPMENT MANUFACTURING FACILITIES

Oregon Statute: 315.341

Sunset Date: 12-31-2013 (preliminary certification)

Year Enacted: 2011

Carryforward: 8 years, see description

Refundable: No

Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The Renewable Energy Resource Equipment Manufacturing Facilities tax credit expired as of December 31, 2013; however, there are revenue impacts for the 2023-25 and 2025-27 biennia due to unused tax credits carried forward. The last tax year for which a carryforward credit may be used is the tax year beginning before January 1, 2027. Credits were certified for businesses with investments in qualified facilities that manufacture renewable energy resource equipment in Oregon. Businesses claiming this credit must have received certification from Oregon Business Development Department (OBDD). Legislation in 2007 (HB 3201) expanded the Business Energy Facilities tax credit (BETC) to allow renewable energy manufacturing facilities to qualify for the BETC tax credit. Subsequent legislation in 2011 (HB 2523) transferred the administration of the manufacturing portion of original BETC from the Oregon Department of Energy to OBDD and, in the process, made the manufacturing portion of BETC its own tax expenditure, the Renewable Energy Resource Equipment Manufacturing Facilities tax credit (Manufacturing BETC). The remaining part of BETC, which has also expired, is described in [1.435, Business Energy Facilities, Conservation and Renewables](#).

Eligible costs included buildings, equipment, machinery, and other expenses related to the manufacturing of renewable energy products such as solar cells, wind turbines or components manufactured for primary use in products using renewable energy, renewable energy storage devices, and the manufacturing of electric vehicles or component parts of electric vehicles.

Qualified Oregon facilities that manufactured renewable energy resource equipment were eligible for a tax credit equal to 50 percent of the maximum eligible cost. Costs were limited up to \$2.5 million for a facility used to manufacture electric vehicles or component parts of electric vehicles and up to \$40 million in the case of any other eligible facility. The credit was taken for the five succeeding tax years at 10 percent of the certified cost of the facility. Any tax credit not used in a particular year because of insufficient tax liability may be carried forward for up to eight years.

The total amount of certified tax credits allowed was \$200 million for the 2009-11 biennium, \$200 million for the 2011-13 biennium and \$50 million for the period from July 1, 2013, to December 31, 2013.

A pass-through option allowed project owners to transfer their tax credit eligibility to another Oregon taxpayer in exchange for a lump sum cash payment. Transferees were a corporation or individual (but not partnerships or LLCs), who then claimed the tax credit on their tax returns. OBDD determined the credit transfer rate employing a formula established by administrative rule in accordance with ORS 285C.549. The credit could be transferred or sold only once.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose for this expenditure. Presumably, it was to provide an economic tool to expand existing manufacturing or attract renewable manufacturing plants to Oregon.

WHO BENEFITS

Oregon businesses with investments in facilities that manufacture renewable energy resource equipment. Taxpayers with a tax liability who purchase tax credits also benefit. For calendar years 2008-2013, six corporations received nearly \$115 million dollars in tax credits. All of these credits have been sold to 12 other corporate and 13 individual taxpayers for a total of \$77 million.

EVALUATION

Not evaluated.

1.417 OREGON LOW-INCOME COMMUNITY JOBS INITIATIVE

Oregon Statute: 315.533(2)

Sunset Date: 06-30-2016

Year Enacted: 2011

Carryforward: 5 years, see description

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available*	Not Available*	Not Available*
2025-27	Not Available*	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue impact numbers are not provided for tax expenditures that may affect at most a few taxpayers.

DESCRIPTION

The Oregon Low-Income Community Jobs Initiative tax credit expired as of June 30, 2016; however, there are revenue impacts for the 2023-25 and 2025-27 biennia due to certified credits taken over a seven-year period and unused tax credits carried forward to succeeding years. Taxpayers who made a qualified low-income community investment were eligible for a credit against personal or corporate income taxes equal to 39 percent of the cost of the investment. A qualified low-income community investment was an equity investment in, or long-term debt security issued by, a qualified community development entity (CDE) which met specified conditions and obtained certification from the Oregon Business Development Department. The investment must have been acquired with cash after July 1, 2012, and the CDE must have used at least 85 percent of the cash purchase price toward making capital or equity investments in, or loans to, any qualified active low-income community business, as defined in section 45D of the Internal Revenue Code (federal New Markets Tax Credit program).

These low-income communities were located in census tracts that had a poverty rate of 20 percent or more, or where the median income was below 80 percent of either the statewide median income or the metropolitan median income, whichever was lower. Community development entities, also defined in section 45D of the Internal Revenue Code, are entities that have entered into an allocation agreement with the Community Development Financial Institutions Fund of the U.S. Department of the Treasury. CDEs serving Oregon that had been allocated Federal New Market Tax Credits were allowed to apply to use this tax credit.

The credit applied to qualified investments made between July 1, 2012 and June 30, 2016. The credit was taken over seven years with no credit in the tax year that the investment is made or in the following tax year, a seven percent credit in the third tax year, and an eight percent credit for each of the four subsequent tax years.

This credit was nonrefundable. Any allowable credit related to investments made on or after July 1, 2012, and before January 1, 2014, and not used by the taxpayer for a particular tax year could be carried forward to offset the taxpayer's tax liability for any subsequent tax year. Legislation in 2013 set a limit of five years for a taxpayer to carry forward any allowable credit related to investments made on or after January 1, 2014, that is not used by the taxpayer for a particular tax year to offset the taxpayer's tax liability in future tax years. The credit was not allowed to be transferred or sold.

A taxpayer who claimed this credit was not allowed to claim any other credit under ORS Chapter 317 or ORS Chapter 285C during the same tax year based on activities related to the same qualified active low-income community business.

The maximum amount that may be claimed by all Oregon taxpayers for this credit is \$16 million per tax year; the maximum amount of Oregon tax credits invested in any single project could not exceed \$4 million for investments made on or after July 1, 2012, and before January 1, 2014. Legislation in 2013 set the maximum amount of Oregon tax credits invested in any single project at \$8 million for investments made on or after January 1, 2014.

Fifteen percent of the total \$16 million, \$2.4 million, was reserved for clean energy projects that produce goods that directly reduce emissions of greenhouse gases or were designed as environmentally sensitive replacements for products in current use, or projects which had a primary purpose of improving the environment or reducing emissions of greenhouse gases.

PURPOSE

The statute that allowed this expenditure does not explicitly state a purpose. Based on the legislative staff revenue impact statement for SB 817 (2011), the purpose of this credit was “to increase private capital investments in Oregon small businesses operating in low-income communities.”

WHO BENEFITS

Investors in qualified equity investments.

EVALUATION

Not evaluated.

1.418 LONG TERM RURAL ENTERPRISE ZONE FACILITIES (INCOME TAX)

Oregon Statute: 317.124

Sunset Date: 06-30-2018 (local certification)

Year Enacted: 1997

Carryforward: 5 years

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available*	Not Available*	Not Available*
2025-27	Not Available*	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer, but could at a later date.

DESCRIPTION

Corporations that make certain large investments in a rural enterprise zone facility are eligible for a tax credit, if approved by the Governor. For S corporations that claim the credit, the credit is shared by the S corporation shareholders and claimed against their Oregon personal income tax. The investment must have been locally approved for the related property tax expenditure, [2.014, Long Term Rural Enterprise Zone \(Property Tax\)](#), on or before June 30, 2018. To be eligible for the property tax exemption, the investment must be located in a county with chronic unemployment or low income. See [2.014, Long Term Rural Enterprise Zone \(Property Tax\)](#) for details on investment and newly hired employee criteria.

The tax credit is equal to 62.5 percent of the taxpayer’s gross payroll costs at the facility. The credit applies only against liabilities in excess of a threshold amount of up to \$1 million. The amount of the threshold may be lower, depending on the facility’s location and workforce size. The credit may be claimed over a period of five to 15 years, as determined by the Governor and elected by the taxpayer, starting with the tax year that begins no later than in the third calendar year after the facility is placed in service. Each year’s unused credits can be carried forward for up to five years.

Approval from the Governor is required for this income tax credit; it is not required for the related property tax exemption, [2.014, Long Term Rural Enterprise Zone \(Property Tax\)](#).

Income tax payments made by corporations that are approved by the Governor for this credit are deposited into the Long-Term Enterprise Zone Fund and are annually distributed to specified local property taxing districts. This redistribution occurs whether or not the taxpayer uses this credit.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage investment in rural areas of chronic unemployment or low income.

WHO BENEFITS

Very few corporations have been approved by the Governor to claim the credit.

EVALUATION

Not evaluated.

1.419 RESERVATION ENTERPRISE ZONE (INCOME TAX)

Oregon Statute: 315.506

Sunset Date: 12-31-2029

Year Enacted: 2001

Carryforward: No

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

Qualified taxpayers operating a new business facility in a reservation enterprise or partnership zone may claim an income tax credit against tribal property tax paid. The tribal tax must be imposed on non-tribal businesses on a uniform basis across the relevant territory. C corporations claim this credit against their corporate excise tax, and S corporation shareholders, partners, and sole proprietors claim it against personal income taxes.

The amount of the credit is prorated for nonresidents and part-year residents. The credit must be used in the same year that the tribal tax is paid and may not be carried forward to another year. The amount of tax credit used in a given tax year cannot exceed the tax liability for that tax year.

The government of each federally recognized Indian tribe in Oregon can have the Oregon Business Development Department designate a single reservation enterprise zone, covering any reservation area of the tribe, as well as any off-reservation land of the tribe held in trust by the U.S. Government or pending trust status anywhere in the state. The reservation enterprise zone may cover an area of no more than 12 square miles, which does not have to be contiguous.

The government of any eligible Indian tribe may also cosponsor one or more reservation partnership zones comprising a contiguous area of up to 12 square miles. A reservation partnership zone includes lands within the jurisdiction of a cosponsoring city, port or county and may (but does not need to) also include both lands held in trust by the federal government for the benefit of the tribe or lands within the boundaries of the tribe's reservation.

Except for this tax credit, reservation enterprise zones and reservation partnership zones are otherwise equivalent to a regular rural enterprise zone, such that businesses can be exempt from property taxes if they meet the requirements for tax expenditure 2.013, [Enterprise Zone Businesses](#), or 2.014, [Long Term Rural Enterprise Zone \(Property Tax\)](#), which do not sunset for purposes of these tribally based designations. Neither property tax exemption has been used yet in a reservation enterprise zone.

In 2023, the Legislature extended the sunset of this credit to December 31, 2029 (HB 2071).

PURPOSE

"To remove the tax disincentives that currently inhibit private business and industry from locating and operating enterprises within the boundaries of the rural Indian reservations of this state" (ORS 285C.303).

WHO BENEFITS

Businesses operating in reservation enterprise/partnership zones. Currently, two reservation enterprise zones have been re-designated for the Confederated Tribes of Umatilla Indian Reservation (CTUIR) and the Confederate Tribes of Warm Springs. No reservation partnership zone is known to exist.

EVALUATION

Provided by the Oregon Business Development Department

For CTUIR at least, this tax credit has reportedly been useful in its instituting a property tax to pay for infrastructure improvements, which can serve economic development in other ways. The credit as such makes this even more doable, by offsetting the deterrent of the tribal tax on businesses in the enterprise zone. In addition, this tax expenditure eliminates redundant tax layering among sovereign entities and may be compared to a credit for foreign taxes paid. OBDD stands ready to assist all Tribes in Oregon regarding the creation of tribal enterprise zones, and the taxation options that it would facilitate in addition to inducing private business development. This tax expenditure has apparently been used sparingly, so far. It does not have employment or reporting requirements, and the Department, otherwise, lacks the data or direct experience to address it further.

1.420 PUBLIC UNIVERSITY VENTURE DEVELOPMENT FUND

Oregon Statute: 315.640
Sunset Date: 12-31-2029
Year Enacted: 2005

Carryforward: 3 years
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$200,000	\$200,000
2025-27	Less than \$100,000	\$200,000	\$200,000

DESCRIPTION

Oregon public universities and Oregon Health and Science University may establish university venture development funds to provide capital for the development of commercially viable products and services. Either the universities or their foundations may administer the funds. When a fund accepts a donation, the university or foundation issues a certification letter to each donor.

Donors who have received certifications qualify for a credit, not to exceed \$600,000, against their personal or corporate income taxes equal to 60 percent of the amount donated during that tax year. The amount each taxpayer claims in any one year may not exceed the tax liability of that taxpayer for that year. Unused credit amounts may be claimed in future tax years for up to three consecutive tax years after the year in which the credit is initially allowed. The credit is prorated for a nonresident taxpayer. If the amount of donation is claimed as a deduction for federal tax purposes, the donation amount is added to federal taxable income for Oregon tax purposes to claim the credit.

The venture development funds provide grants for the purpose of facilitating the commercialization of university research and development. When a venture development fund earns income from those grants in the form of royalties, cash from the sale of equity, or license fee payments, the fund must transfer 20 percent of the realized income to the state General Fund, up to the amount of tax credits certified by the university.

Whenever the total outstanding amount owed to the General Fund reaches \$8.4 million, the issuance of further tax credit certificates must cease. The universities may issue new tax credits equal to the transferred amounts immediately upon deposit into the General Fund. ORS 350.540(2) divides the \$8.4 million total into specific amounts allowed for each university:

- Oregon State University : \$3,947,720
- University of Oregon : \$2,122,670
- Portland State University : \$1,275,840
- Oregon Health and Science University : \$1,023,770
- Eastern Oregon University, Southern Oregon University, Western Oregon University, and Oregon Institute of Technology : \$7,500 each.

Legislation in 2023 (HB 2071) extended the scheduled sunset of the provision from December 31, 2027 to December 31, 2029.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose for the tax credit, but the statute that allows university development venture funds does state a purpose. That purpose is “facilitating the commercialization of university research and development” (ORS 350.550).

WHO BENEFITS

Taxpayers who make donations to university venture development funds. Typically, very few corporations claim this credit each year. For tax year 2022, about 30 personal income taxpayers saved an average of about \$7,200 in Oregon taxes using this credit.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure achieves its purpose. It facilitates taxpayers' contributions to the research and development activity of the research universities to further their research mission. University research is often in service of the creation of knowledge helpful to the development of economic activity in Oregon.

1.421 WORKING FAMILY HOUSEHOLD AND DEPENDENT CARE

Oregon Statute: 315.264

Sunset Date: 12-31-2027

Year Enacted: 2015

Carryforward: No

Refundable: Yes

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$34,300,000	\$34,300,000
2025-27	Not Applicable	\$34,200,000	\$34,200,000

NOTE: The revenue impact estimate includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers.

DESCRIPTION

A refundable personal income tax credit is allowed for low and middle-income working families with employment-related dependent care expenses. To qualify, the taxpayer must have paid qualifying expenses for one or more qualifying individuals (generally a dependent under age 13, a disabled dependent, a disabled taxpayer or a disabled spouse) so the taxpayer (and the taxpayer's spouse if filing jointly) could work, look for work, or attend school.

Qualified expenses include only amounts paid by the taxpayer for household services and care of the qualifying individual as specified by the federal child and dependent care expenses tax credit. The qualifying expenses cannot exceed \$12,000 for one qualifying individual or \$24,000 for two or more qualifying individuals and cannot exceed the taxpayer's earned and imputed income if filing single or the lesser of the taxpayer's or the taxpayer's spouse's earned and imputed income. These qualifying expenses limits are not adjusted for inflation. Imputed income is \$1,000 or \$2,000 multiplied by the number of qualified months a taxpayer was a student with one or more qualifying individuals, respectively.

For those filing jointly, if either the taxpayer or the taxpayer's spouse attended school full-time or were disabled, \$250 (\$500 if two or more qualifying persons cared for) per month counts toward earned income for that person.

A taxpayer cannot claim the credit unless the taxpayer's adjusted gross income (AGI) is less than or equal to three times the federal poverty guidelines. For 2024, the AGI limit by household size is:

Household Size	AGI Limit
2	\$61,320
3	\$77,460
4	\$93,660
5	\$109,740
6	\$125,880
7	\$142,020
8 or more	\$158,160

The amount of the credit as a percentage of qualifying expenses varies depending on the taxpayer's household size, AGI, and the age of the youngest dependent. The percentage varies from 4 percent to 75 percent of the qualifying expense. The amount of the credit initially increases with income and then decreases until the credit is not allowed above three times the federal poverty guidelines. The credit increases for taxpayers with younger dependents.

Following the creation of this tax credit in 2015, the Legislature made minor technical modifications to it in 2017 (SB 162) and 2018 (HB 4028). In 2021, the Legislature (HB 2433) extended the sunset for this income tax credit to

December 31, 2027, and modified other provisions, including accounting for imputed income (in addition to earned income subject to taxation) as noted above, applicable on or after January 1, 2022 and before January 1, 2028.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2433 (2021), the “policy purpose of the credit is to enable low-income working families to care for young children and disabled dependents by offsetting care costs so that they may be gainfully employed or attending school.”

WHO BENEFITS

Low and middle-income working taxpayers with employment-related dependent care expenses whose federal adjusted gross income is less than three times the federal poverty level.

The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	1,790	\$1,270	\$2.3	14%
\$19,400 - \$40,400	4,790	\$1,480	\$7.1	43%
\$40,400 - \$67,700	5,970	\$990	\$5.9	36%
\$67,700 - \$117,800	2,340	\$560	\$1.3	8%
Above \$117,800	30	\$360	<\$0.1	<1%
All Full-Year Filers	14,920	\$1,110	\$16.6	100%
Part-Year and Nonresident Filers	1,250	\$710	\$0.9	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

Since this is a refundable credit, the full amount of credits claimed can be used, even if the taxpayer has little or no tax liability. Of the approximately \$17.5 million claimed for 2022, \$10 million was used to reduce tax liability, while the remaining \$7.5 million exceeded tax liability and was paid directly to taxpayers.

EVALUATION

Provided by the Oregon Department of Human Services

With the high cost of dependent care in Oregon, this tax credit is helpful to families, though many still struggle to afford quality dependent care needed to work or attend school. This credit supplements other programs provided by the State of Oregon to help families afford dependent care and move towards self-sufficiency. Because this credit is only available to those who file a tax return, providing free tax preparation assistance to low-income families statewide is critical to ensuring that all eligible families receive the benefits of this credit.

1.422 CONTRIBUTIONS TO OFFICE OF CHILD CARE

Oregon Statute: 315.213

Sunset Date: 12-31-2021

Year Enacted: 2001

Carryforward: 4 years

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The credit against corporation or personal income taxes for contributions made to the Office of Child Care (OCC) of the Oregon Department of Education expired as of December 31, 2021; however, there can be revenue impacts for the 2023–25 and 2025–27 biennia due to tax credits being carried forward for up to a four-year period. Carryforward credit may be used through tax years beginning before January 1, 2026.

The OCC issued tax credit certificates to taxpayers who made contributions to the Child Care Fund (CCF). The total value of tax credit certificates could not exceed \$500,000 per calendar year. The 2015 Legislature set the maximum amount of credit available to taxpayer to be 50 percent of the contribution. Previously, it was 75 percent of the contribution.

The amount of the credit must be added to Oregon taxable income if it is deducted when computing federal taxable income.

The OCC distributed the funds from the contributions according to rules established by the Early Learning Council.

PURPOSE

A statute (ORS 329A.706) pertaining to implementation of this tax credit program stated that its purposes were to “(a) Encourage taxpayers to make contributions to the Office of Child Care by providing a financial return on qualified contributions and by soliciting other contributions. (b) Achieve specific and measurable goals for targeted communities and populations. (c) Strengthen the viability and improve the professional development of child care providers.”

WHO BENEFITS

Very few taxpayers benefit from this tax credit.

EVALUATION

Not evaluated.

1.423 INDIVIDUAL DEVELOPMENT ACCOUNT DONATION (CREDIT)

Oregon Statute: 315.271
Sunset Date: 12-31-2029
Year Enacted: 1999

Carryforward: 3 years
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$13,400,000	\$13,400,000
2025-27	Less than \$100,000	\$13,700,000	\$13,700,000

DESCRIPTION

Individuals or businesses donating to state selected fiduciary organizations for distribution to individual development accounts (IDAs) are allowed a tax credit for donations prior to January 1, 2030. The tax credit is equal to a percentage of the taxpayer’s donation, as determined by the fiduciary organization, but cannot exceed 90 percent (increased from 70 percent by legislation in 2019) of the donation. Donations are applied toward matching IDA account holder savings and toward program related expenses. Any credit not used due to insufficient tax liability may be carried forward for up to three years.

The amount used to compute the credit must be added to Oregon taxable income if it was deducted when computing federal taxable income.

The Housing and Community Services Department (OHCS) maintains a limit on the total number of credits issued each year. The Legislature in 2015 set the limit of total credits allowed to all taxpayers as \$7.5 million and in 2016 set the total credit allowed to a taxpayer in any tax year not to exceed \$500,000. OHCS administers the Oregon IDA Initiative through Neighborhood Partnerships, which selects fiduciary organizations to manage the IDAs.

There is another tax expenditure closely related to this program: [1.312, Individual Development Accounts \(Exclusion and Subtraction\)](#), which provides that contributions to and earnings from IDAs are not taxed by Oregon if used for approved purposes.

In 2023, legislation (HB 2071) extended the sunset of the tax credit for a donation to the Individual Development Account from December 31, 2027 to December 31, 2029.

PURPOSE

The purpose for this credit is set forth in ORS 458.675. In summary, the purpose is to fund an asset-based antipoverty strategy providing lasting on-ramps to financial stability for low-income Oregonians that promotes personal financial

management, investment, and savings for key assets. These assets include: acquiring post-secondary education; the first-time purchase of a primary residence; capitalization of a small business; replacement of a primary residence when replacement offers significant improvement of habitability or energy efficiency; certain improvements and repairs to a primary residence; purchase of equipment or training needed to obtain or maintain employment; the rental of a primary residence to achieve housing stability; purchase or repair of a vehicle; saving of funds for retirement; debt repayment; and establishment of emergency savings.

WHO BENEFITS

Individuals or businesses making donations to state selected fiduciary organizations for distribution to IDAs directly benefit from this credit. For tax year 2022, about 380 personal income tax filers used the credit and almost all of them had incomes above \$100,000.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose in creating economic opportunity for low-income Oregonians. Proceeds from donations are matched with savings from participants to build the financial resiliency of households. Further, because the credit remains at no more than 90 percent of donations, the credit provides more resources than a direct expenditure. Available credits granted started at a contribution limit of \$666,667 in 2003, rising two million each year, until 2009 when contributions were capped at \$10 million. In 2016 the formula changed from a contribution cap to a cap on tax credits available and was set at \$7.5 million where it has since remained. Tax credit contributions to administrative contractor Neighborhood Partnerships totaled \$8.1 million in 2020, and \$8.3 million in 2021 and 2022, which is the maximum possible revenue based on the current tax credit cap of \$7.5 million annually. Between January 2017 and December 2021, more than 6,000 Oregon residents opened Individual Development Accounts (IDAs). In the same period, 5,256 savers successfully completed an asset purchase, saving over \$12.8 million, and receiving \$32 million in match funds. 90% of savers were extremely low to low income and 68% were women. Savers identified in the following racial and ethnic categories: 45.8% white alone; 26% Hispanic/Latinx; 11.9% Black or African American, 8.5% Native American, 5.2% Asian, Native Hawaiian, or other Pacific Islander. Upon successful completion of all program requirements, including financial education, over the course of six months to three years participants save toward their goals to purchase their first home, obtain needed postsecondary education, start a small business, or achieve other goals. Savers are matched up to \$5 for every \$1 they save. In the 2021 and 2022 program years 24% invested in education; 22% in home purchase; 18% in microenterprise, and 35% across the other asset categories. The Oregon IDA Initiative performs rigorous evaluation of the efficacy of the program, originally working with the Regional Research Institute at Portland State University and since 2015 using in-house data and evaluation expertise. This evaluation data demonstrates growing impact for communities of color and consistent stabilization outcomes, including improvements in credit, attainment of savings, and timely mortgage payments. Copies of the evaluations may be found here: <https://www.oregonidainitiative.org/evaluation/>.

1.424 OREGON AFFORDABLE HOUSING LENDER'S CREDIT

Oregon Statute: 317.097

Sunset Date: 12-31-2031 (certification)

Year Enacted: 1989

Carryforward: 5 years

Refundable: No

Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$14,700,000	\$300,000	\$15,000,000
2025-27	\$15,700,000	\$300,000	\$16,000,000

DESCRIPTION

This provision allows a credit against corporation taxes for lending institutions that make qualified loans at below market interest rates for the construction, development, acquisition, or rehabilitation of a manufactured dwelling park, low-income housing, limited equity cooperative, or a preservation project. For S corporations that claim the credit, the credit is shared by the S corporation shareholders and claimed against their Oregon personal income tax.

The Housing and Community Services Department may certify qualified loans up to a specified cap on the total credits that can be granted each fiscal year for new and existing qualified loans. This cap has been increased multiple times over the past two decades, from \$11 million per fiscal year in 2005, to the current cap of \$35 million.

The amount of the credit for the lending institution is the difference between the finance charge on the qualified loan and the finance charge at the time the qualified loan was made that would have been charged had a similar loan been made at market interest rates. The finance charge is the total of all interest, loan fees, interest on any loan fees financed by the lending institution, and other charges related to the cost of obtaining credit.

The credit cannot exceed 4 percent of the unpaid balance of the qualified loan during the tax year for which the credit is claimed. Any credit that cannot be used because of insufficient tax liability in the current year can be used in later years, for up to five years.

To qualify for the credit, qualified loans must be made on or before December 31, 2025 and certified by the Housing and Community Services Department on or before December 31, 2031. Legislation in 2021 (HB 2433) allowed qualified loans to be certified to receive credits for up to 30 years in the case of a qualified loan with a contract for rent assistance or financing resources from the United States Department of Agriculture, or 20 years for any other qualified loan. This legislation also set the current cap on total credits that can be granted in each fiscal year.

Legislation in 2023 (HB 2071) extended the certification date from December 31, 2025 to December 31, 2031 and expanded the credit to include loans for limited equity cooperative housing.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Based on the legislative staff revenue impact statement for HB 2066 (2017), “the policy purpose of the affordable housing lender’s tax credit is to increase the supply of low-income housing.”

WHO BENEFITS

For tax year 2021, 18 corporate income taxpayers benefited from this credit, reducing tax liability by about \$260,000 on average. For tax year 2022, 20 personal income taxpayers benefited from this credit, reducing tax liability by about \$6,600 on average. Low-income households also benefit from this provision because some of the recipients of the loans are required to pass on savings from a reduced interest rate to their tenants in the form of lower rents.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose and effectively supports nearly 13,000 households throughout the state. Without the credit program, rents in Oregon Affordable Housing Tax Credit projects would be 15–25 percent higher, which would decrease the number of homes available for low and very low-income Oregonians while increasing the rent burden on those same families. Without this incentive, many of the low-income housing projects targeting households with incomes below 80 percent of Area Median Income would not be financially feasible.

The credit is used with many other direct spending programs such as housing grants and federal Low Income Housing Tax Credits. The credit is applied to the permanent financing after all direct spending programs have been incorporated into the overall project financing. By using the credit in this manner, the maximum benefit is passed on to the tenants for a “bottom line” tenant rent benefit. A direct spending program would likely be more costly to taxpayers.

Since July 2007 OHCS has successfully used this credit for projects partially financed with tax-exempt bonds. The ability to use these credits increases the amount of debt a development can service, which reduces the aggregate amount of federal, state and local public financing needed for such projects to be financially feasible. OHCS continues to effectively use this program to preserve projects that have Project Based Housing Assistance Payment contracts and other federal rent subsidies.

1.425 MANUFACTURED DWELLING PARK CLOSURE

Oregon Statute: 316.090
Sunset Date: 12-31-2025
Year Enacted: 2007

Carryforward: No
Refundable: Yes
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$100,000	Less than \$100,000
2025-27	Not Applicable	Less than \$100,000	Less than \$100,000

NOTE: The revenue impact includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers. The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A \$5,000 refundable credit is allowed for owners of manufactured dwellings who are forced to move due to the closure of their manufactured dwelling park. To qualify for the credit, the taxpayer must live in the manufactured dwelling as their primary residence and then leave the park between January 1, 2007 and December 31, 2025 as a result of closure. The credit is reduced by any payments made as compensation for exercise of eminent domain by order of a federal, state or local agency. A taxpayer may claim only one credit due to park closure for any given tax year.

This credit is refundable. To the extent the credit exceeds a taxpayer's liability (reduced by any nonrefundable credits), the taxpayer is entitled to a payment of the excess.

Legislation in 2019 (HB 2164) extended the scheduled sunset of the provision from December 31, 2019 to December 31, 2025.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of the credit is "to mitigate the costs to manufactured dwelling park households that are forced to move due to instances where market forces and development are causing closure of the manufactured dwelling park."

WHO BENEFITS

Manufactured dwelling owners who are forced to move due to the closure of their manufactured dwelling park. Very few taxpayers claim this credit.

EVALUATION

Provided by the Oregon Housing and Community Services Department

Manufactured homes and associated parks are critical housing stock options for low-income Oregonians. With extremely low vacancy rates and escalating rents across the state, many park tenants have few options if a park closes. Additionally, high property values are enticing park owners to redevelop, increasing the likelihood that park closures will occur. Despite low usage, likely due in part to OHCS' preservation efforts, any incentive that assists displaced low-income manufactured home tenants is absolutely meeting its objectives and is achieving the purpose of the tax expenditure.

1.426 QUALIFIED RESEARCH EXPENSES FOR SEMICONDUCTOR COMPANIES

Oregon Statute: 315.518 and 315.519
Sunset Date: 12-31-2029
Year Enacted: 2023 (HB 2009)

Carryforward: 5 years
Refundable: Partially, see description
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$23,100,000	\$800,000	\$23,900,000
2025-27	\$53,500,000	\$2,000,000	\$55,500,000

NOTE: The revenue impact includes both the portion used to reduce tax liability, and the portion paid directly to taxpayers.

DESCRIPTION

A credit against personal or corporate income taxes is allowed for taxpayers who are qualified semiconductor companies with qualified research expenses for research conducted in Oregon starting in tax year 2024.

To qualify as a semiconductor company, a company's primary activity must be in the research, design, development, fabrication, assembly, testing, packaging or validation of semiconductors, or in the creation of semiconductor manufacturing equipment, semiconductor core intellectual property, or electronic design automation software that is primarily intended for use in the semiconductor industry.

The credit shall be determined in accordance with section 41 of the Internal Revenue Code, except as follows:

- The applicable percentage specified in section 41(a) of the Internal Revenue Code shall be 15 percent of the difference between qualified research expenses and a base amount prescribed by IRC 41. Also, the Oregon credit equals 15 percent of the basic research expenses determined under IRC 41(e)(1)(A).
- Qualified research and basic research consist only of research conducted in Oregon by a qualified semiconductor company, in support of a trade or business directly related to semiconductors.

To claim a credit, a taxpayer must obtain approval (certification) from the Oregon Business Development Department. The maximum credit that can be claimed by a taxpayer in one tax year is \$4 million. Any credit that cannot be used because of insufficient tax liability in the current year can be carried forward up to five years.

A portion of the credit is refundable to taxpayers meeting certain employment criteria:

- 75 percent refundable for taxpayers with fewer than 150 employees in Oregon.
- 50 percent refundable for taxpayers with at least 150 employees in Oregon but fewer than 500.
- 25 percent refundable for taxpayers with at least 500 employees in Oregon but fewer than 3,000.
- There is no refundable portion allowed for taxpayers with 3,000 or more employees in Oregon.

The biennial credit certification limits are \$35 million in 2023-25, \$80 million in 2025-27, \$90 million in 2027-29, and \$50 million for fiscal year 2029-30. The sunset date for this credit is December 31, 2029. To administer these statutory biennial credit certification limits, Oregon Administrative Rule 123-401-0600, "Calculation of Tax Credit Certified Amount", establishes annual caps for each tax year as follows: \$35 million for tax year 2024; \$38.25 million for tax year 2025; \$41.75 million for tax year 2026; \$44 million for tax year 2027; \$46 million for tax year 2028; \$50 million for tax year 2029. The same rule prescribes the approach to managing credit usage if potential tax credits sought across all applications exceed the total annual credit cap for a particular tax year.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. The legislative staff revenue impact statement for HB 2009 (2023) states "the policy purpose of the research and development tax credit is to increase Oregon's employment base across firms that support the semiconductor sector."

WHO BENEFITS

Businesses who conduct research in the semiconductor industry. The Oregon Business Development Department (Business Oregon) registered 26 businesses who would be eligible to claim a credit for tax year 2024. Such pre-registration is not required for future tax years.

EVALUATION

Provided by the Oregon Business Development Department

As a global center for semiconductor research & development, many semiconductor companies in Oregon play a critical role in the nation's efforts to regain technological leadership in this sector. This expenditure is intended to recognize and further the contributions of Oregon's semiconductor industry to regional and national economies. While no taxpayer has yet claimed the R&D Tax Credit, the one-time registration required to qualify for the credit in tax year 2024 provided information on expected utilization. An analysis issued by the Legislative Revenue Office in March 2024 identified 26 qualified taxpayers, projecting a total \$600 million in R&D expenses and an estimated tax credit usage of \$23.9 million in 2024. While the number of qualifying taxpayers is expected to vary year to year as business practices

evolve, Business Oregon expects the number of potential recipients to grow in future years. The 26 registered taxpayers for 2024 are likely a subset of potential recipients during the life of this expenditure, due to the short time frame and challenge of notifying all possible program stakeholders of the initial registration process in 2023.

The R&D Tax Credit is expected to benefit semiconductor companies of all sizes and representing different aspects of the production cycle, from software design start-ups to leading-edge chip manufacturers. Business Oregon anticipates the credit to serve as both a retention incentive for businesses with research and development operations already in Oregon, and a recruitment offering for new businesses interested in locating or expanding in the state. Growing the research and development ecosystem for the semiconductor sector increases both the demand and supply of highly educated workforce, which in turn supports further recruitment of semiconductor and other advanced manufacturing and technology companies to Oregon.

1.427 PUBLICLY SUPPORTED HOUSING SELLER'S CREDIT

Oregon Statute: 315.283

Sunset Date: 12-31-2029

Year Enacted: 2023 (HB 2071)

Carryforward: 3 years

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Yet Available	Not Yet Available	Not Yet Available
2025-27	Not Yet Available	Not Yet Available	Not Yet Available

DESCRIPTION

Qualified sellers of publicly supported housing (PuSH) are allowed to claim a credit against personal or corporate income taxes. A sale qualifies if the purchaser enters into a recorded agreement that extends or adopts affordability restrictions for a period of at least 30 years. Dwelling units that would have otherwise had expiring affordability restrictions generally must be extended as-is. Dwelling units with newly adopted restrictions must have rental rates that are affordable to households earning 80 percent of the area median income. The housing must have been owned by the seller for at least five years prior to the qualified sale. Sellers and purchasers may not have a business or familial relationship with each other, called an identity of interest.

The credit amount may not exceed 2.5 percent, or 5 percent if owned for at least ten years, of the lesser of the sale price or the appraised amount. Credit amounts not used by a taxpayer in a given tax year can be carried forward for up to three succeeding tax years.

Credits and sales must be approved by the Oregon Housing and Community Services Department to qualify. The total credit amount certified may not exceed \$3 million for all taxpayers in a year.

Legislation passed in 2024 (SB 1526) states that this credit applies to sales of publicly supported housing completed in tax years beginning on or after January 1, 2024 and before January 1, 2030.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. The legislative staff revenue impact statement for HB 2071 (2023) states: "the policy purpose of this credit is to incentivize owners of affordable housing, in which affordability restrictions are nearing expiration, to sell such housing to a buyer willing to preserve affordable housing for an additional thirty years."

WHO BENEFITS

Qualified sellers of publicly supported housing for which the purchaser enters into a recorded affordability restriction agreement.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This resource has not yet been made available, so we are not yet able to evaluate its impact.

1.428 AGRICULTURAL WORKER OVERTIME

Oregon Statute: 315.133

Sunset Date: 12-31-2028 (see description)

Year Enacted: 2022

Carryforward: No

Refundable: Yes

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$2,900,000	\$16,700,000	\$19,600,000
2025-27	\$5,600,000	\$44,800,000	\$50,400,000

NOTE: The revenue impact estimate includes both the portion used to reduce tax liability and the portion paid directly to taxpayers.

DESCRIPTION

A credit against personal or corporate income taxes is allowed based on overtime compensation paid to agricultural workers by eligible employers. The credit is available for tax years beginning on or after January 1, 2023. Eligible employers are defined as employers who are in the business of crop production, animal production, or aquaculture. The credit is a percentage of the overtime compensation paid to agricultural workers over the tax year.

The credit is refundable. To the extent that the credit exceeds a taxpayer's liability (reduced by any nonrefundable credits), the taxpayer receives payment for the excess. Uniquely, this credit is allowed to be claimed even by corporations paying the corporation minimum tax.

Labor contractors may not claim the credit, but eligible employers may claim the credit based on wages paid to workers through a labor contractor. Overtime wages paid to immediate family members do not qualify for this credit. Before claiming the credit, the taxpayer must receive a notice of acknowledgment from the Department of Revenue stating the maximum amount of credit the taxpayer can claim. The amount of credit depends on the year, number of employees, and whether the employer works in the dairy industry.

The total tax credit amount allowed for all taxpayers in a given calendar year may not exceed \$55 million. Nonresidents are entitled to claim this credit. The same limitations and calculations apply to residents and non-residents if the employees perform the work in Oregon. Nonresidents shall prorate the credit using the proportion provided in ORS 316.117.

Because the legislation enacting this statute did not expressly provide a period of applicability for this tax expenditure, ORS 315.037(3) establishes that this tax expenditure shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year is the tax year beginning before January 1, 2029.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 4002 (2022), "the purpose of this credit is to reduce the costs to eligible employers resulting from requiring overtime compensation, with greater benefit available primarily to smaller agricultural employers. The ultimate intent of the policy is to ensure agricultural employees receive overtime compensation for weekly hours worked in excess of forty hours".

WHO BENEFITS

Eligible agricultural employers who are required to pay overtime compensation to their workers benefit from this tax credit.

EVALUATION

Provided by the Oregon Department of Agriculture

The tax credit facts are described and cannot be evaluated until implemented in 2024 for the 2023 tax year.

1.429 SMALL FOREST OWNER FOREST CONSERVATION (INCOME TAX)

Oregon Statute: 315.124

Sunset Date: None

Year Enacted: 2022

Carryforward: Yes, see description

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available	Not Available	Not Available
2025-27	Not Available	Not Available	Not Available

DESCRIPTION

A credit against personal or corporation income taxes is allowed for qualifying timber harvests. A qualifying harvest is one that is adjacent to a riparian area subject to the Oregon Forest Practices Act, is equal to or larger than the area not harvested in the riparian area, and abides by standard practice harvest restrictions. To qualify, a taxpayer must be a small forestland owner and they cannot have harvested more than two million board feet of timber in the prior three years. A small forestland owner is a person who owns fewer than 5,000 acres of forestland. Beginning January 1, 2024, applications to be certified for the credit were accepted by the Oregon Department of Forestry (ODF).

The amount of the credit is equal to the total of the certified stumpage value of the specified standing timber not harvested in the conservation area, the cost of establishing the stumpage value, and one-half of certified stumpage value of retained timber in a dry channel area adjacent to the forest conservation area (if applicable).

The stumpage value of the standing timber and the associated costs must be certified by ODF to be eligible for the credit and the taxpayer is required to abide by the standard practice harvest restrictions on the property for 50 years after the certification is issued. If the property used to claim this credit is subsequently harvested or otherwise violates the conservation restrictions required to be certified for this credit, then additional tax, interest, and penalties may apply.

The credit is claimed in the tax year in which the harvest is completed. Credits unclaimed because of insufficient tax liability can be carried forward to any following tax year, and may be carried forward to nonconsecutive tax years.

If the holder of the credit dies before being able to use the full amount certified, the estate of the decedent may use the credit for estate taxes imposed by Oregon (see [15.006, Small Forest Owner Forest Conservation \(Estate Transfer Tax\)](#)). If the amount of the credit exceeds the estate tax liability, the heirs and devisees may use the remaining credit amount for their personal or corporate income taxes.

Legislation in 2023 (HB 2161) modified this tax credit by increasing certified stumpage value by 25 percent, if the small forestland owner has federal adjusted gross income of not more than 125 percent of the Oregon median household income averaged over three previous tax years, and if the small forestland owner is significantly disproportionately impacted by rules adopted by the State Forester under ORS 527.610 to 527.770 or cannot use the small forestland minimum option because of the horizontal lineal feet limitation applicable to fifth field watersheds.

The legislation that enacted this tax expenditure specified that any sunset under ORS 315.037 does not apply.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. The legislative staff revenue impact statement for SB 1502 (2022) stated “the policy purpose of this credit is to provide small forestland owners with financial encouragement to adopt standard practice harvest restrictions.”

WHO BENEFITS

Individuals, their heirs, and corporations that own fewer than 5,000 acres of forestland in the state and harvest fewer than 2 million board feet annually in accordance with the specific restrictions and avoid harvesting trees within riparian areas.

EVALUATION

Not evaluated.

1.430 BOVINE MANURE

Oregon Statute: 315.176(3)(a)

Sunset Date: 12-31-2021

Year Enacted: 2017

Carryforward: 4 years

Refundable: No

Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available*	Not Available*	Less than \$100,000
2025-27	Not Available*	Not Available*	Less than \$100,000

*In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer but could at a later date.

DESCRIPTION

The bovine manure tax credit expired as of December 31, 2021. Even though this credit has expired, there are revenue impacts in the 2023-25 and 2025-27 biennia due to credits carried forward. The last year to claim this credit is the tax year beginning before January 1, 2026. A credit was allowed for corporate or personal income taxpayers who collected bovine manure to be produced into biofuels or who produced bovine manure into biofuel. Tax credits were certified by the Oregon Department of Agriculture (ODA).

The credit rate is equal to \$3.50 per wet ton of bovine manure collected for or produced into biofuels. The credit can be claimed only one time for each unit of manure. The amount of credit used in a given tax year cannot exceed the tax liability of the corporation or individual claiming the credit, and any unused credit can be carried forward for four years. The total amount certified by ODA may not exceed \$5 million for all taxpayers in any calendar year. ODA is required to make rules to proportionately reduce the amount of certified credits among all taxpayers in the event that applications exceed the annual limit.

The tax credit for bovine manure collection or production can be transferred once to a third party. The transfer must take place before the due date (including extensions) or the filing date of either the transferor's or transferee's tax return, whichever is earliest, for the first year the credit is allowed.

Legislation in 2016 (SB 1507) extended only the biomass manure portion of the Production or Collection of Biomass income tax credit through December 31, 2021. A tax credit for all other forms of biomass was allowed to sunset. In addition, a tax credit for biomass manure was reduced from \$5.00 to \$3.50 per wet ton of biomass manure beginning tax year 2016, with the certification process to be continued by the Oregon Department of Energy. Legislation in 2017 (HB 2066) moved up the sunset date of the biomass manure provision to align with the sunset of the credit for other types of biomass, so no biomass credit could be claimed after tax year 2017, except for any unused credit carried forward.

The 2017 legislation also created a new credit for taxpayers who collect bovine manure that produce biofuels and producers of biofuels from bovine manure to be administered by ODA and with an annual limit per tax year for all credits certified.

Legislation in 2018 (HB 4028) changed the annual limit period from tax year to calendar year (due to the difficulty of administering the transfer provisions) and clarified that the term "bovine manure" means cattle manure, whereas "cattle" means cows, heifers, bulls, steers, or calves.

PURPOSE

The statute that allowed this expenditure does not explicitly state a purpose. The legislative staff revenue impact statement for HB 2066 (2017) stated "The policy purpose of the bovine manure tax credit is to ensure the viability and use of digester technology investment."

WHO BENEFITS

Producers and collectors of bovine manure that produce biofuel. The anaerobic digesters, which break down biodegradable material, in this case bovine manure, by microorganisms are located on dairy farms located in Tillamook and Morrow counties as well as in the Willamette Valley.

EVALUATION

Not evaluated.

1.431 CROP DONATION

Oregon Statute: 315.156
Sunset Date: 12-31-2025
Year Enacted: 1977

Carryforward: 3 years
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$300,000	\$300,000
2025-27	Less than \$100,000	\$200,000	\$200,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A credit is allowed against personal or corporation income taxes for donating crops to gleaning cooperatives, food banks, or other qualifying charitable organizations in Oregon. The credit can be claimed on both harvested and post-harvest donations. The credit is calculated as 15 percent of the wholesale market price of the donated crops or livestock that produce food for human consumption.

Unused credit amounts due to insufficient tax liability may be carried forward for up to three years. The amount of the credit is prorated for nonresidents and part-year residents.

The Crop Donation credit was reinstated in 2014 after previously expiring in 2011, and the credit percentage was increased from 10 percent to 15 percent.

Legislation in 2019 (HB 2164) extended the scheduled sunset of the provision from December 31, 2019 to December 31, 2025.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of this credit is to "...increase the amount of food donated to gleaning cooperatives, food banks and other charitable organizations as well as providing compensation to farmers who donate already harvested crops."

WHO BENEFITS

Farmers and agricultural producers who donate crops or livestock to qualified organizations benefit directly from this tax credit. For tax year 2022, about 50 personal income taxpayers claimed this credit. Few corporations claim the credit.

EVALUATION

Provided by the Oregon Department of Agriculture

Food security is a significant issue for nearly 15 percent of the state's residents. The Crop Donation credit helps offset costs for farmers and growers who donate their crops/livestock to charitable organizations working to close this food gap.

The Crop Donation tax credit may serve as an efficient mechanism to encourage food donations from the agricultural sector by providing financial incentives that help offset the significant costs associated with harvesting, transporting, and donating crops. This credit leverages the existing tax infrastructure, potentially reducing administrative burdens compared to direct subsidies, and supports farmers in managing surplus crops in a way that benefits the community, enhances their public image, and fosters stronger ties with local communities.

However, the effectiveness of this credit may be limited for smaller or newer farming operations, which might struggle with awareness, logistical challenges, or insufficient taxable income to fully benefit. If the credit were eliminated, it is likely that food donations from the agricultural sector would decline, exacerbating food insecurity in Oregon. To improve the program, outreach efforts could be expanded to ensure all eligible farmers are informed and able to participate, while additional support for logistical challenges could help smaller farms contribute more effectively.

Additionally, expanding the credit to include more agricultural products or increasing the credit percentage could further enhance its impact on reducing food insecurity in the state.

1.432 ENERGY CONSERVATION LENDER'S CREDIT

Oregon Statute: 317.112
Sunset Date: 12-31-2011
Year Enacted: 1981

Carryforward: 15 years, see description
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The energy conservation lender's credit expired as of December 31, 2011; however, there can be revenue impacts for the 2023-25 and 2025-27 biennia due to unused tax credits carried forward to succeeding years. The last tax year for which a carryforward credit may be used is the tax year beginning before January 1, 2027.

Commercial lending institutions were allowed a tax credit for financing energy conservation measures of residential fuel oil customers or wood heating residents. The lending corporations must have charged no more than a 6.5 percent interest rate on the loan. The credit equaled the difference between the interest that would have been earned if the loan was made at the usual rate of interest (or alternatively at an upper limit rate established by the Department of Energy) and the interest earned at the 6.5 percent rate. For S corporations that claimed the credit, the credit was shared by the S corporation shareholders and claimed against their Oregon personal income tax.

The loan amount could not exceed \$5,000 for a single dwelling unit or \$2,000 for a single dwelling unit if it was owned by a corporation and the term could not exceed 10 years. The loan must have been used by the dwelling owner to finance energy conservation measures that were recommended as cost effective in an energy audit, which must have been completed before getting the loan. Any credits not used because of insufficient tax liability could be carried forward up to 15 succeeding years.

PURPOSE

The statute that allowed this expenditure does not explicitly state a purpose. Presumably, the purpose was to promote energy conservation in oil and wood heated homes by encouraging lending institutions to make loans for the financing of energy saving projects.

WHO BENEFITS

Lenders who made loans for energy conservation measures. Homeowners and owners of rental housing qualifying for energy conservation loans. Very few taxpayers benefit from this credit.

EVALUATION

Not evaluated.

1.433 TRANSPORTATION PROJECTS

Oregon Statute: 315.336(1)

Sunset Date: 12-31-2017 (12-31-2015 for transit service projects)

Year Enacted: 2011

Carryforward: 5 years

Refundable: No

Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	\$0	\$0	\$0

DESCRIPTION

The credit for transportation projects expired as of December 31, 2017; however, there can be revenue impacts for the 2023-25 and 2025-27 biennia due to certified credits claimed over five years and unused tax credits that are allowed to be carried forward for a maximum of five years. A credit is only allowed if the first tax year for which the credit would otherwise be claimed began before January 1, 2018.

A credit is allowed against corporation or personal income taxes for transportation projects in Oregon. Entities were eligible for this credit if they acquired an alternative fuel vehicle fleet or developed alternative fuel vehicle infrastructure (AFVI) projects such as electric vehicle charging or compressed natural gas systems. Public or nonprofit entities that provided transit services to members of the public and received state or federal funding for those services were also eligible for a transportation projects tax credit. In the case of transit service projects, a credit was only allowed if the first tax year for which the credit would otherwise be allowed to be claimed began on or before 2015. Also in this case, the last tax year for which a carryforward credit may be used is the tax year beginning before January 1, 2025.

The transportation projects program was created in 2011, along with [1.436, Energy Conservation Projects](#), and a previous tax expenditure for renewable energy development contributions (ORS 315.326).

To qualify for a transportation project tax credit, a taxpayer must have had the project certified by the Oregon Department of Energy (ODOE).

Alternative fuel vehicle projects were eligible for a credit up to 35 percent of the certified cost. Alternative fuel vehicle projects could either be for the development of alternative fuel vehicle infrastructure or the acquisition of an alternative fuel vehicle fleet. Legislation in 2013 added alternative fuel vehicle fleet acquisitions as eligible for tax credits beginning in January 2015.

Certified projects other than alternative fuel vehicle projects were eligible for a credit amount ranging from 10 to 35 percent of certified project costs, depending on the tax year.

When this provision was enacted, the total amount of potential tax credits for the program was limited to \$20 million per biennium. Legislation in 2013 and 2014 redirected a one-time total of \$3 million of transportation project tax credits for the 2013-15 biennium to be auctioned for tax years 2013-2016. The proceeds from the auction of these tax credits were to be deposited into the Alternative Fuel Vehicle Revolving Fund.

Project owners with no tax liability—such as schools, governmental agencies, tribes or nonprofit organizations—could take advantage of the transportation project program by using the pass-through option, which allowed project owners to transfer their tax credit eligibility to a partner for a lump sum cash payment. Transfer partners can be businesses or individuals with an Oregon tax liability, who then claim the credit on their tax returns. Transfer to a partnership was not allowed. ODOE administered the transfer process and set the rate for calculating the payment. Each credit could be transferred or sold only once.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. Presumably, the purpose was similar to that of [1.435, Business Energy Facilities, Conservation and Renewables](#), which was “to encourage the conservation of electricity, petroleum and natural gas by providing tax relief for Oregon facilities that conserve energy resources or meet energy requirements through the use of renewable resources.” (ORS 469B.133)

WHO BENEFITS

The alternative fuel vehicle infrastructure and fleet portions of the transportation tax credit program benefited businesses, organizations, nonprofits, tribes, schools, and public bodies that wanted to invest in cleaner transportation fuels and vehicles.

The transit services portion of the transportation tax credit program benefited government or nonprofit entities that received state or federal funding for transit services.

EVALUATION

Not evaluated.

1.434 ALTERNATIVE ENERGY DEVICES (RESIDENTIAL)

Oregon Statute: 316.116
Sunset Date: 12-31-2017
Year Enacted: 1977

Carryforward: 5 years, see description
Refundable: No
Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$200,000	\$200,000
2025-27	Not Applicable	Less than \$100,000	Less than \$100,000

DESCRIPTION

The alternative energy devices (residential) tax credit (or commonly referred to as the Residential Energy Tax Credit, RETC) expired as of December 31, 2017; however, there can be revenue impacts for the 2023-25 and 2025-27 biennia due to possible tax credits being claimed over a four-year period and also due to unused tax credits that are allowed to be carried forward for a maximum of five years. The last tax year for which a carryforward credit may be used is the tax year beginning before January 1, 2026.

A credit against personal income tax was allowed to taxpayers who installed qualifying alternative energy devices in their residences.

The Oregon Department of Energy (ODOE) listed a set of eligible devices that homeowners or renters could purchase and install in their primary or secondary residence located in Oregon. Eligible devices, appliances, and systems have changed over time to adapt to changes in energy use and market conditions.

Tax credit eligibility requirements varied for over twenty types of eligible devices. In general, tax credits were issued for no more than 50 percent of the cost of the device or \$1,500. Credits over \$1,500 must have been claimed over multiple years, with no more than \$1,500 being claimed per year.

RETC applicants may also have been eligible for additional incentives offered by their utility, the Energy Trust of Oregon, or the federal government. These additional incentives were deducted from the eligible cost of the device when calculating the credit amount. The sum of the state and federal credits and incentives could not exceed the cost of the acquisition, construction, and installation of the alternative energy device.

Any credit unused in a particular year because of insufficient tax liability could be used in later years, for up to five years. If a taxpayer had no Oregon tax liability, the taxpayer could have transferred the tax credit to an individual with an Oregon tax liability, who made a lump sum payment equal the present value of the certified tax credit (as determined by ODOE) to the taxpayer.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. Presumably, the purpose was to promote residential energy savings, energy displacement, and market transformation by providing personal income tax credits to Oregonians who purchased energy efficient devices and renewable energy systems for their homes.

WHO BENEFITS

The Residential Energy Tax Credit program benefited homeowners, renters, and landlords statewide who upgraded or purchased energy efficient devices and renewable energy systems.

EVALUATION

Not evaluated.

1.435 BUSINESS ENERGY FACILITIES, CONSERVATION AND RENEWABLES**Oregon Statute:** 315.354**Sunset Date:** 12-31-2012 (see description)**Year Enacted:** 1979**Carryforward:** 8 years, see description**Refundable:** No**Transferable:** Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$200,000	\$100,000	\$300,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The conservation and renewable energy resource components of the Business Energy Facilities tax credit (or commonly referred to as the Business Energy Tax Credit, BETC) have expired as of December 31, 2012; however, there can be revenue impacts for the 2023-25 and 2025-27 biennia due to certified credits taken over a five-year period and unused tax credits that are allowed to be carried forward for a maximum of eight years. The last tax year for which a carryforward credit may be used is the tax year beginning before January 1, 2028.

The 2011 Legislature transferred the administration of the manufacturing component of BETC from the Oregon Department of Energy (ODOE) to the Oregon Business Development Department and in the process made the manufacturing component of BETC its own tax expenditure, [1.416, Renewable Resource Equipment Manufacturing Facilities](#) tax credit.

To replace the expired components of the BETC program, the 2011 Legislature created three new tax credits which are a part of the Energy Incentive Program (EIP):

- [1.433, Transportation Projects](#)
- [1.436, Energy Conservation Projects](#)
- A credit for contributions to the renewable energy development fund administered by ODOE (ORS 315.326)

For this tax expenditure, which includes just the conservation and renewable components of BETC, a credit was allowed against corporation or personal income taxes for Oregon businesses with investments in such projects as energy conservation and renewable energy resources.

To have qualified for a BETC (conservation and renewables), the project must have been certified by ODOE before starting. Conservation projects included a variety of energy conservation projects in the following categories: energy efficiency (e.g. insulation, HVAC, and lighting), homebuilder (e.g. solar systems installed in new or existing homes), rentals (e.g. appliance and weatherization improvements in rental housing), transportation (e.g. alternate fuel vehicles) and other projects, such as recycling. Renewable energy resource projects included a variety of projects that use or produce energy from biomass, wind, water, geothermal, solar photovoltaic cells or solar thermal (water heating) systems.

In general, conservation projects received a tax credit of 35 percent of the eligible costs. After the 2007 Legislative Session, renewable projects received a tax credit of 50 percent of eligible costs. Eligible costs must have been directly related to the project and included equipment costs, engineering and design fees, materials, supplies, installation costs, loan fees and permit costs. Maintenance costs and costs to replace equipment at the end of its useful life or required to meet regulations were not eligible.

The limit on eligible costs was \$10 million for conservation projects and \$20 million for renewable projects. For certain types of projects, there were additional limits on the eligible costs.

The tax credit was taken over five years with 10 percent taken the first two years and 5 percent taken the final three years for 35 percent tax credits, and 10 percent taken each year for 50 percent tax credits. If the eligible costs of the

project were \$20,000 or less, the tax credit could be taken in one year. Any tax credit not used in a particular year because of insufficient tax liability could be carried forward for up to eight years.

Project owners with no tax liability, such as schools, governmental agencies, tribes or nonprofit organizations could take advantage of the BETC program by using the pass-through option, which allowed project owners to transfer their BETC eligibility to a partner for a lump sum cash payment. The transfer partner could have been a business or individual with an Oregon tax liability, who then claimed the tax credit on their tax returns. The ODOE administered the transfer process and set the rate for calculating the payment. The pass-through option was expanded by the Legislature in 2001 and participation steadily increased. In 2009, just over half of the projects transferred their BETC credit. The 2009 Legislature limited the transferability, so that the credit could not be transferred more than once.

- House Bills 3672 (2011) and 4079 (2012) clarified the sunset of the BETC program:
- Applications for preliminary BETC certification that were received by April 15, 2011 must have received their preliminary certification by June 30, 2011.
- Projects with a preliminary certification that began construction by April 15, 2011 must receive their final certification based on the conditions of their preliminary certifications (for conservation and transportation projects, final certification cannot be after June 30, 2014).
- Projects with preliminary certification that began construction after April 15, 2011 must receive final certification by December 31, 2012.

Certifications are granted for a period not to exceed five years and begin on the tax year during which the applicant submitted their completed application for final certification.

PURPOSE

“To encourage the conservation of electricity, petroleum and natural gas by providing tax relief for Oregon facilities that conserve energy resources or meet energy requirements through the use of renewable resources.” (ORS 469B.133)

WHO BENEFITS

Businesses that invested in facilities that produced energy, reduced the consumption of energy, recycled, or used less polluting transportation fuels. For tax year 2021, approximately 11 corporate taxpayers benefited from the credit. These taxpayers reduced their tax liability by an average of about \$120,000. For tax year 2022, approximately 20 personal income taxpayers (composed of individuals, S corporations, and partnerships) benefited from the credit.

EVALUATION

Not evaluated.

1.436 ENERGY CONSERVATION PROJECTS

Oregon Statute: 315.331(1)

Sunset Date: 12-31-2017

Year Enacted: 2011

Carryforward: 5 years

Refundable: No

Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

The tax credit for an energy conservation project has expired as of December 31, 2017; however, there can be revenue impacts for the 2023-25 and 2025-27 biennia due to certified credits taken over a five-year period and unused credits that are allowed to be carried forward for a maximum of five years. The last tax year for which a carryforward credit may be used is the tax year beginning before January 1, 2027.

A credit was allowed against corporation or personal income taxes for energy conservation projects in Oregon. The Energy Conservation Projects program was created in 2011, along with [1.433, Transportation Projects](#), and a previous tax expenditure for renewable energy development contributions (ORS 315.326).

To qualify for an Energy Conservation Project tax credit, a taxpayer must have had the project certified by the Oregon Department of Energy (ODOE). Qualifying energy conservation projects were eligible for a credit that was equal to an amount up to 35 percent of the project cost. The credit was taken over five years in increments related to project cost: 10 percent in the first and second year and 5 percent each year thereafter. Taxpayers with certified costs of \$20,000 or less could take the tax credit in one year. Any credit unused in a particular year because of insufficient tax liability could be carried forward for up to five years. The total amount of potential tax credits for the program was limited to \$28 million per biennium.

Project owners with no tax liability, such as schools, governmental agencies, tribes, or non-profit organizations could take advantage of the Energy Conservation Project program by using the pass-through option, which allowed project owners to transfer their tax credit eligibility to a partner for a lump sum cash payment. Transfer partners could be a business or individual with an Oregon tax liability, who then claimed the tax credit on their tax return. Transfer to a partnership was not allowed. The ODOE administered the transfer process and set the rate for calculating the payment. The credit could be transferred or sold only once. The 2015 Legislature permitted ODOE to require applicants to enter into a performance agreement, which can include a recertification requirement for owners of projects with a cost of \$1 million or more.

PURPOSE

The statute that allowed this expenditure does not explicitly state a purpose. Presumably, the purpose was similar to [1.435, Business Energy Facilities, Conservation and Renewables](#) which states "...to encourage the conservation of electricity, petroleum and natural gas by providing tax relief for Oregon facilities that conserve energy resources or meet energy requirements through the use of renewable resources." (ORS 469B.133)

WHO BENEFITS

The program benefited businesses, organizations, public bodies, schools, nonprofits, and tribes that invested in energy efficiency or conservation projects at a business or residential rental property in Oregon.

EVALUATION

Not evaluated.

1.437 WEATHERIZATION LENDER'S CREDIT

Oregon Statute: 317.111

Sunset Date: 10-31-1981

Year Enacted: 1977

Carryforward: 15 years, see description

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	Not Applicable	Less than \$100,000
2025-27	Less than \$100,000	Not Applicable	Less than \$100,000

DESCRIPTION

The weatherization lender's credit has expired as of October 31, 1981; however, there can be revenue impacts in the 2023–25 and 2025–27 biennia due to credits carried forward to succeeding years due to possible unused tax credits from credits claimed during the term of the weatherization loan. A credit against corporation income taxes was allowed for commercial lending institutions that made below market rate loans for financing weatherization projects. The credit was equal to the difference between the amount of interest charged at a rate of 6.5 percent and the amount that would have been charged at the lesser of 12 percent or the average percent the lending institution charged for home improvement loans. Unused credit amounts could be carried forward for 15 years.

PURPOSE

The statute that allowed this expenditure did not explicitly state a purpose. Presumably, the purpose was to promote energy conservation by encouraging lending institutions to make loans for projects to weatherize homes.

WHO BENEFITS

Lending institutions that made weatherization loans between 1977 and 1981. Very few taxpayers benefit from this credit.

EVALUATION

Not evaluated.

1.438 FISH SCREENING DEVICES

Oregon Statute: 315.138

Sunset Date: 01-01-2030 (preliminary certification)

Year Enacted: 1989

Carryforward: 5 years

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000	Less than \$100,000

DESCRIPTION

A credit against personal and corporation income tax is allowed for installing a fish screening device, bypass device, or fishway (except where the device is part of a federally regulated hydroelectric project). These projects are primarily on agricultural land to keep fish from entering irrigation canals. Legislation passed in 2007 attempted to encourage the wider use of these devices by allowing the credit on any substantial diversion of water from rivers, lakes and streams that is not required to be licensed by the Federal Energy Regulatory Commission. Legislation passed in 2009 (HB 2065) further clarified that the credit is allowed for installing any of the following: a fish screening device, bypass device, or fishway.

The credit for each device installed equals 50 percent of the taxpayer's net certified cost of installing the screening device, bypass device, or fishway. The total credit allowed cannot exceed \$5,000 per device installed. Devices that are financed by the Water Development Fund are ineligible for the credit.

The device must be certified by Oregon Department of Fish and Wildlife (ODFW) to be eligible for the credit. There is a preliminary certification prior to installation and a final certification upon completion.

Screening devices may be required on any diversion located in waters of the state in which fish subject to the department's jurisdiction live. The owner must maintain any mandatory device after completion.

The credit is claimed in the year of final certification. Credits unclaimed because of insufficient tax liability can be carried forward for up to five years. The 2023 Legislature extended this tax credit (HB 2071), so that ODFW may issue preliminary certifications up to January 1, 2030.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. The legislative staff revenue impact statement for HB 2171 (2023) stated "The policy purpose of this credit is to support fish protection, production, and population connectivity of native migratory fish thereby supporting the restoration of Oregon's native salmonid populations."

WHO BENEFITS

Taxpayers who install fish screening or passage devices. For 2023, ODFW certified 23 screens and fishways for a qualifying tax credit.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

This tax credit is an additional incentive for water users to install fish screens and fishways to maximize fish protection while still allowing landowners to divert and utilize water for agricultural and other operations. This program is not used frequently enough to create a significant impact on the State budget but it is a benefit at the individual land owner scale. Participation in this program is low due to many projects being implemented with cost share assistance from a variety of partners such that the landowner and eligible taxpayer does not end up with certifiable costs eligible for the tax credit. When landowners do fund these projects their ability to use this tax credit is part of the selling point of the project.

1.439 SHORT LINE RAILROAD REHABILITATION

Oregon Statute: 315.593

Sunset Date: 12-31-2029

Year Enacted: 2019

Carryforward: 5 years

Refundable: No

Transferable: Yes

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Available*	Not Available*	Not Available*
2025-27	Not Available*	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer, but could at a later date.

DESCRIPTION

A credit is allowed against corporation or personal income taxes based on short line railroad rehabilitation project costs paid or incurred during the tax year for which the credit is claimed.

Project costs are those directly related to the work necessary to maintain, reconstruct, or replace infrastructure in Oregon owned or leased by a short line railroad. Project costs do not include those funded by or used to qualify for any state or federal grants, or costs that are used to claim a federal tax credit.

A short line railroad is defined as a carrier by railroad with less than \$900 million in annual operating revenues (see 49 C.F.R. pt. 1201).

The amount of the credit allowed to a taxpayer is the lesser of:

- 50 percent of the rehabilitation project costs paid or incurred
- \$3,500 times the number of miles of short line track the taxpayer owns or leases in the state

Any portion of the credit exceeding the taxpayer's liability in a particular tax year may be carried forward for up to five years. The amount of the credit is prorated for nonresidents and part-year residents.

Rehabilitation projects must be certified by the Oregon Department of Transportation to be eligible for this credit. The total amount of potential tax credits allowed at the time of preliminary certification may not exceed \$4 million for any biennium (ORS 315.603).

Legislation in 2023 (HB 2071) extended the sunset of this provision to allow claims for tax years beginning before January 1, 2030. Other legislation in 2023 (HB 3406) eliminated the distinction between tier 1 and tier 2 short line railroads. Prior to this legislation, the amount of the credit allowed to a taxpayer who owned or leased 200 or more miles of short line track in the state was the lesser of:

- 50 percent of the rehabilitation project costs paid or incurred
- \$1,000 times the number of miles of short line track the taxpayer owns or leases in the state

The credit calculation did not change for taxpayers who owned or leased less than 200 or more miles of short line track in the state and for government owned or leased railroads.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of this credit is “to encourage and leverage private capital investment in short line railroad infrastructure with the intent to create cascading economic development opportunities across the state and to incentivize new short line rail customers by improving the conditions of short line railroads throughout Oregon.”

WHO BENEFITS

Short line railroads with eligible rehabilitation costs.

EVALUATION

Provided by the Oregon Department of Transportation

In 2023, ODOT issued preliminary certifications to eight short line railroads for the rehabilitation tax credit. This preliminary certification is step 1 of a 2-step process. Step 2 requires the railroad to submit proof that they actually completed the project and spent the funds as outlined in their application by year end. ODOT issued final certifications to six of those short line railroads for 2023, which is 75% of those that received preliminary certifications.

1.440 OREGON LIFE AND HEALTH IGA ASSESSMENTS

Oregon Statute: 734.835

Sunset Date: 12-31-2027

Year Enacted: 1975

Carryforward: No

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	\$700,000	Not Applicable	\$700,000
2025-27	\$200,000	Not Applicable	\$200,000

DESCRIPTION

Life and health insurance companies pay both the corporation income tax and two types of assessments (class A and class B) to Oregon Life and Health Insurance Guaranty Association (OLHIGA). The class B assessment is made if needed to cover the cost of claims against insurers that have gone out of business. In general, the solvent insurers are then entitled to a credit against their corporation income taxes for class B assessments paid to OLHIGA at the rate of 20 percent of the assessment per year for each of the five calendar years following the year in which the assessment was paid, not to exceed each solvent insurer’s corporate income tax liability. In the event that an insurer goes out of business, all remaining assessment amounts may be credited for the year it goes out of business.

Legislation in 2021 (HB 2433) extended the sunset such that the first tax year for which the credit would be allowed is the tax year beginning before January 1, 2028.

PURPOSE

ORS 734.770 states that “the purpose of ORS 734.750 to 734.890 is to protect the persons specified in ORS 734.790, subject to certain limitations, against failure in the performance of contractual obligations, under life and health insurance policies and annuity contracts specified in ORS 734.790, because of the impairment or insolvency of the insurer issuing such policies or contracts.”

WHO BENEFITS

Insurance companies affected by OLHIGA class B assessments. The recent OLHIGA class B assessments have been:

- \$4,410,000 in 2017
- \$1,700,000 in 2018
- \$1,145,000 in 2019
- \$1,500,000 in 2020

There was no assessment from 2021 onwards.

EVALUATION

Provided by the Department of Consumer and Business Services

This type of credit is common throughout the United States. It allows insurers to recover the costs of the assessment they pay to the guaranty association, which in turn is used to cover the cost of claims against insolvent insurers. In effect the General Fund, through the OLHIGA, funds the costs associated with Oregon claims filed against insolvent insurers, with some offsetting increase in retaliatory tax.

Because this tax credit is taken on the excise tax and the excise tax, net of credits, is used in calculating the retaliatory tax, there is an offsetting increase in retaliatory tax as a result of this credit, which is dollar for dollar within certain thresholds.

1.441 POLITICAL CONTRIBUTIONS

Oregon Statute: 316.102
Sunset Date: 12-31-2027
Year Enacted: 1969

Carryforward: No
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$6,000,000	\$6,000,000
2025-27	Not Applicable	\$4,600,000	\$4,600,000

DESCRIPTION

A nonrefundable credit may be claimed against personal income taxes for qualified political contributions made, not to exceed \$50 (\$100 for a joint return). The credit may not be taken by joint filers with federal adjusted gross income above \$150,000, or by other types of filers with federal adjusted gross income above \$75,000. These limits were decreased from \$200,000 and \$100,000 by legislation in 2019 (HB 2164) and are not adjusted for inflation.

Qualified political contributions include cash contributions to a major or minor political party; to candidates for state, federal, or local elective office; or to political action committees that are registered with the Oregon Secretary of State's office. Credits that cannot be used because of insufficient tax liability in the current year may not be carried forward to later years.

Legislation in 2023 (HB 2071) extended the sunset of the provision to allow claims for tax years beginning before January 1, 2028.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of the credit is "to encourage large numbers of people to contribute small amounts of money to candidates and political parties, thereby encouraging participation in the political process."

WHO BENEFITS

Taxpayers who make cash contributions to political candidates or parties or political action committees. The number of full-year resident taxpayers who claim this credit fluctuates from year to year. Usage of the credit is generally highest during presidential election years. The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	5,820	\$20	\$0.1	4%
\$19,400 - \$40,400	8,180	\$40	\$0.4	12%
\$40,400 - \$67,700	11,600	\$60	\$0.7	23%
\$67,700 - \$117,800	13,410	\$80	\$1.1	39%
Above \$117,800	7,050	\$90	\$0.6	22%
All Full-Year Filers	46,060	\$60	\$2.8	100%
Part-Year and Nonresident Filers	1,130	\$50	\$0.1	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Secretary of State

In 2016, the multi-partisan Campaign Finance Task Force chaired by former Secretary of State Jeanne Atkins voted 13-1 (with three excused) to adopt the statement that: “Oregon campaign contribution tax credit is useful in encouraging small contributions by individuals and gives candidates and political committees the opportunity to do positive outreach to constituents. The program has had bipartisan support over the years.”

Since the tax credit has been in effect since 1969, it is difficult to know how many Oregonians would participate without the tax credit, although many candidates and political committees highlight the tax credit as a fundraising tool. However, the credit amount is relatively small at \$100 on a joint return for filers earning less than \$150,000 and \$50 for filers earning less than \$75,000. In the absence of publicly funded elections or other state-sponsored grassroots campaign financing measures, the political contribution tax credit remains a tool to encourage political participation by individuals.

While prior assessments of this tax expenditure have included speculation on the percentage of contributions that used the credit, the adoption of income limits in 2017 makes such calculations untenable. For example, while the Secretary of State’s Elections Division can reasonably estimate the number of donations made each year under \$100, they are not able to assess the income level of the contributor(s) and whether they qualified for this tax credit. Therefore, the Oregon Secretary of State is unable to discern which contributions were received from contributors that are eligible for this tax credit from those that are not.

Because the income limit is not tied to inflation, the overall fiscal impact of this expenditure is likely to decrease with time, as fewer and fewer Oregonians become eligible.

1.442 OREGON CULTURAL TRUST

Oregon Statute: 315.675

Sunset Date: 12-31-2027

Year Enacted: 2001

Carryforward: No

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$8,500,000	\$8,500,000
2025-27	Less than \$100,000	\$8,800,000	\$8,800,000

DESCRIPTION

A credit is allowed against personal or corporation income tax for contributions made to the Trust for Cultural Development Account of the Oregon Cultural Trust. In order to qualify for the credit, the taxpayer must first contribute

to one of the more than 1,600 Oregon cultural organizations exempt from federal income taxes per 26 U.S.C. § 501(c)(3). The taxpayer can then make a contribution of equal or lesser value to the Trust for Cultural Development Account, thereby purchasing a tax credit for that amount. The credit is equal to the amount of the contribution to the Trust for Cultural Development Account, and may not exceed \$500 for a single filer, \$1,000 for joint filers, or \$2,500 for corporations. Married taxpayers filing separate returns may claim a share of the allowed joint credit in proportion to the contribution made by each spouse. The amount of the credit is prorated for nonresidents and part-year residents. This credit may not exceed the tax liability of the taxpayers and may not be carried forward to another tax year.

Legislation in 2023 (HB 2071) extended the scheduled sunset of the provision from December 31, 2025 to December 31, 2027.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the revenue impact statement for HB 2164 (2019), the purpose of the credit is “to protect and stabilize Oregon’s cultural resources by creating a solid foundation for the future through the leveraging of private sector support from both individuals and businesses.”

WHO BENEFITS

The table below shows personal income tax usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	130	\$50	<\$0.1	<1%
\$19,400 - \$40,400	250	\$180	<\$0.1	1%
\$40,400 - \$67,700	620	\$290	\$0.2	4%
\$67,700 - \$117,800	1,770	\$420	\$0.7	18%
Above \$117,800	4,700	\$660	\$3.1	76%
All Full-Year Filers	7,480	\$550	\$4.1	100%
Part-Year and Nonresident Filers	80	\$290	\$0.0	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

For tax year 2021, very few corporate taxpayers benefited from this credit. These taxpayers reduced their tax liability by \$2,000, on average.

EVALUATION

Provided by the Oregon Cultural Trust

Oregon Cultural Trust (OCT) is nationally recognized for its engagement of citizens around statewide cultural issues, and its role in providing stable and accessible funding for cultural nonprofits. Part of this access is achieved through 36 county coalitions, whose role is to distribute funds locally according to each county’s cultural plan. Since its inception the Trust as brought in 175,618 donations totaling \$86,137,185. Fiscal year 2024 was a record year with 10,317 donations totaling \$4 million., with an average giving amount of \$502 per gift. Annually, about one half of the income from contributions (50-40 percent) is allocated to the Trust corpus, ensuring the health and growth of the cultural sector in Oregon for future generations. The balance (no less than 50 percent, but no more than 60 percent) is granted to Cultural Development Grant Program, Community Participation Grant Program, and Core Partner Agencies. Through a competitive peer review process administered by the OCT, grant awards are strategically made to fulfill the OCT's mission, to lead Oregon in cultivating, growing and valuing culture as an integral part of communities. OCT does this by inspiring Oregonians to invest in a permanent fund that provides annual grants to cultural organizations. Final report and plans are also reviewed annually by the OCT for compliance and impact.

The Trust for Cultural Development Account serves as a repository for both public and private moneys designated to fund specific arts, heritage and humanities programs. Under the direction of the Trust Board, each fiscal year the Oregon Cultural Trust (OCT) disburses no less than 50 percent, but no more than 60 percent of the amount in the Trust for Cultural Development Account on July 1. The OCT may use up to \$400,000 of the total amount disbursed from the account for administrative expenses, with a cost of living increase applied annually (Consumer Price Index). The balance of the amount disbursed from the account is distributed in the following three ways: Cultural Development

Grant Program (50 percent), Community Participation Grant Program (25 percent), and Core Partner Agencies (25 percent).

The Cultural Development Grant Program supports the preservation, stabilization of and investment in Oregon's cultural resources. Grants address significant opportunities to advance, preserve or stabilize cultural resources, and invest in the development of new cultural resources. Grant awards are required to be matched 1:1 and have a broad cultural impact, and applicants must have culture as a priority within their mission. To ensure equitable distribution of program awards, organizations must wait to apply for one year if they have received funding in the previous two consecutive years.

The Community Cultural Participation Grant Program provides funds to 36 counties and Oregon's nine federally recognized Indian tribes, collectively called the "County Coalition," for local cultural activities. Each applicant must develop a local cultural plan that identifies priorities specific for building public participation across cultural disciplines and organizations. Each member must also identify annual benchmarks and involve local leadership and governance for grant fund management and plans must be broadly disseminated within each county or tribe. The members of the statewide coalitions are all volunteer driven and disburse grants in their communities, often in fiscal sponsorship with their county government or mission-aligned cultural nonprofit.

The Core Partner Agencies program enables state agencies to carry out their missions and mandates, serve more grantees, encourage new cultural undertakings, and research and investigate ways in which culture and related cultural policy will impact the state in the future. The core partner agencies are the Oregon Arts Commission, Oregon Humanities, the State Historic Preservation Office, the Oregon Heritage Commission, and the Oregon Historical Society. The partners also decide on disbursement of Cooperative Partner Projects, which have included statewide projects such as Oregon's Poet Laureate Program, The Confluence Project, the Oregon Folklife Network and the newly, much needed Organizational and Professional Development Grants for cultural organizations across the state of Oregon.

Of particular note in fiscal year 2024, the Trust received \$454,583 in grants, bequests and matching gifts that were given without the tax credit. The Trust received three bequests totaling \$370,645. Also, we received 136 gifts above the tax credit limit. This is a testament to Oregonians' generous support of the work we are doing for culture in Oregon.

Because of this amazing support, the Trust will be granting a record \$3,960,976 in fiscal year 2025 grants.

Historically the Trust has given out 2,568 grants totaling \$42,778,938.

1.443 PERSONAL EXEMPTION

Oregon Statute: 316.085

Sunset Date: None

Year Enacted: 1985

Carryforward: No

Refundable: No

Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,260,000,000	\$1,260,000,000
2025-27	Not Applicable	\$1,270,000,000	\$1,270,000,000

DESCRIPTION

Oregon personal income taxpayers receive a personal exemption credit for each taxpayer and dependent represented on the return. Individuals who can be claimed as a dependent on another's return cannot claim a credit on their own return. The amount of the credit is indexed to inflation and is \$249 in 2024. The amount of the credit is prorated for nonresidents and part-year residents.

Taxpayers whose filing status is married filing jointly, surviving spouse, or head of household may not claim this credit if their adjusted gross income is above \$200,000, and single filers or married taxpayers filing separate returns may not claim this credit if their adjusted gross income is above \$100,000. The adjusted gross income limits are not adjusted for inflation.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to provide a minimum level of tax-free income that increases with family size for all Oregon personal income taxpayers below a certain income level.

WHO BENEFITS

Oregon personal income taxpayers, except those who are claimed on another taxpayer's return. The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	298,130	\$160	\$48.1	8%
\$19,400 - \$40,400	366,460	\$320	\$117.4	20%
\$40,400 - \$67,700	374,950	\$360	\$135.9	23%
\$67,700 - \$117,800	345,470	\$470	\$161.3	28%
Above \$117,800	189,800	\$610	\$116.1	20%
All Full-Year Filers	1,574,810	\$370	\$578.8	100%
Part-Year and Nonresident Filers	239,510	\$180	\$43.8	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Not evaluated.

1.444 OREGON VETERANS' HOME PHYSICIANS

Oregon Statute: 315.624

Sunset Date: 12-31-2027

Year Enacted: 2007

Carryforward: No

Refundable: No

Transferable: No

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	Less than \$100,000	Less than \$100,000
2025-27	Not Applicable	Less than \$100,000	Less than \$100,000

DESCRIPTION

A credit against personal income tax is allowed for physicians who provide medical care to residents of an Oregon Veterans' Home. The credit is \$1,000 for every eight residents to whom the physician provides care, with a maximum of \$5,000 per year. To qualify for the credit, a physician cannot miss more than 5 percent of scheduled visits with residents, as verified by a letter from an Oregon Veterans' Home. The letter must be submitted with the corresponding tax return. Nonresidents and part-year residents must prorate their credit amount in the same manner they would prorate their standard deduction under ORS 316.117.

A qualifying taxpayer may claim both this credit and the rural medical practitioner credit (see [1.408, Rural Medical Practice](#)).

Legislation in 2021 extended the scheduled sunset of the provision from December 31, 2021 to December 31, 2027.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2433 (2021), the purpose of this credit is "...to increase the number of health care professionals providing long-term care to Oregon veterans, thereby increasing the number of veterans receiving such care."

WHO BENEFITS

Physicians providing care to residents of an Oregon Veterans' Home. Oregon has two Oregon Veterans' Homes, one in The Dalles and one in Lebanon. Very few personal income taxpayers claimed this credit.

EVALUATION

Provided by the Oregon Department of Veterans' Affairs

This tax credit is having the desired effect of encouraging physicians to provide care to residents of an Oregon Veterans' Home. The tax credit is important because Oregon Veterans' Homes are in rural locations and at times have experienced challenges finding physicians to provide care to residents.

1.445 CERTAIN RETIREMENT INCOME

Oregon Statute: 316.157
Sunset Date: 12-31-2025
Year Enacted: 1991

Carryforward: No
Refundable: No
Transferable: No

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$900,000	\$900,000
2025-27	Not Applicable	\$400,000	\$400,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

Low-income taxpayers who are 62 or older and receiving taxable retirement income are allowed a credit against personal income taxes of up to 9 percent of their net pension income. Net pension income is all retirement income included in federal taxable income, except federal pensions excluded from Oregon taxable income (see [1.325, Federal Pension Income](#)) and Social Security benefits, which are not taxed by Oregon. Thus, net pension income consists of private, state, local, and some federal government pensions and distributions from deferred compensation plans, IRAs, SEPs, and Keoghs.

To qualify for the credit, the taxpayer must meet all of the following conditions:

- Household income of \$22,500 or less (\$45,000 or less if married filing jointly)
- No more than \$7,500 (\$15,000 if married filing jointly) in Social Security and/or Tier 1 Railroad Retirement Board benefits
- Household income plus Social Security and Tier 1 Railroad Retirement Board benefits of \$22,500 or less (\$45,000 if married filing jointly).

Legislation in 2019 extended the scheduled sunset of the provision from December 31, 2019 to December 31, 2025.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of this credit is "To provide tax relief to low-income individuals with pension income."

WHO BENEFITS

Low-income retirees benefit from this credit. The table below shows usage of this credit for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Credit	Average Revenue Impact of Credit	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	2,650	\$80	\$0.2	34%
\$19,400 - \$40,400	1,360	\$270	\$0.4	61%
\$40,400 - \$67,700	180	\$180	\$0.0	5%
\$67,700 - \$117,800	0	\$0	\$0.0	0%
Above \$117,800	0	\$0	\$0.0	0%
All Full-Year Filers	4,190	\$150	\$0.6	100%
Part-Year and Nonresident Filers	130	\$100	\$0.0	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Department of Human Services

This tax expenditure appears to achieve its purpose. It provides added financial security to those eligible and contributes to their ability to remain self-sufficient. By encouraging financial independence, this provision reduces demand for other state funded services and saves the state money. This tax expenditure will become increasingly important as the population distribution changes. Current forecasts indicate that current retirement savings are not nearly sufficient to support future retirees in their accustomed lifestyles.

1.501 PUBLIC WAREHOUSE SALES THROWBACK EXEMPTION

Oregon Statute: 314.665

Sunset Date: None

Year Enacted: 2005

Revenue Impact			
	Corporation	Personal	Total
2023-25	Less than \$100,000	Not Applicable	Less than \$100,000
2025-27	Less than \$100,000	Not Applicable	Less than \$100,000

DESCRIPTION

For the purposes of taxation, income of corporations doing business in more than one state is apportioned based on Oregon sales relative to sales in all other states. Sales outside the state that originate in Oregon can be taxed in Oregon, known as a throwback, if the sales are to the federal government or are made in another state where the company is not subject to tax (does not have nexus).

This measure exempts certain corporations from throwing back sales. To qualify for the exemption, the corporation's sole activity in Oregon must be the storage of goods in a public warehouse or storing goods in a public warehouse and with employees in the state whose sole purpose is to solicit sales.

Public warehouse means:

- A warehouse owned or operated by a person who does not own the goods stored in the warehouse
- Does not include a warehouse that is owned by a person who is related to the person who owns goods that are stored in the warehouse, or an affiliate of the person who owns goods that are stored in the warehouse.

The Department of Revenue may determine if a corporation's activities fit this definition of a public warehouse.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage development and expansion of public warehouses in Oregon.

WHO BENEFITS

Corporate taxpayer with a public warehouse. No known taxpayer benefits from this provision.

EVALUATION

Not evaluated.

1.502 TAX RATES FOR CERTAIN PASS-THROUGH INCOME

Oregon Statute: 316.043(2)

Sunset Date: None

Year Enacted: 2013

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	\$242,000,000	\$242,000,000
2025-27	Not Applicable	\$253,000,000	\$253,000,000

DESCRIPTION

Taxpayers with qualifying nonpassive income attributable to a business entity which is a partnership, S corporation, or a sole proprietorship may make an irrevocable election on the original return for that year's qualifying income to be taxed at the following marginal rates (brackets are not adjusted for inflation):

Net Qualifying Income	Tax Rate
\$1 to \$500,000	7.0%
\$500,001 - \$1,000,000	7.5%
\$100,001 - \$2,500,000	8.0%
\$2,500,001 to \$5,000,000	9.0%
More than \$5,000,000	9.9%

The ordinary business income at the business entity level cannot be in excess of \$5 million for the tax year for the taxpayer to be able to use these tax rates. Generally, taxable personal income at or below \$250,000 would be taxed at marginal rates from 4.75 to 8.75 percent, and income over \$250,000 (\$125,000 for single or married filing separately) would be taxed at a marginal rate of 9.9 percent.

Nonpassive taxable income is reduced by nonpassive losses. Nonpassive income and loss are income and loss other than from passive activity as determined under section 469 of the Internal Revenue Code. Nonpassive income does not include wages, interest, dividends, or capital gains.

The taxpayer must materially participate in the trade or business and must meet an employment requirement. Legislation passed in 2014 (SB 1534) clarified the definition of the term “material participation” to match the definition in section 469 of the federal Internal Revenue Code.

A requisite employee may not be an owner, member, or limited partner of the partnership, S corporation, or sole proprietorship. Employees who meet this requirement must work, in the aggregate, at least 1,200 hours in Oregon by the close of the tax year; however, only the hours worked by such an employee in a week in which the employee works at least thirty hours may be considered in determining whether this requirement is met.

The partnership or S corporation must meet either the employee ratio or the income distribution requirement based on the amount of ordinary business income (OBI) as follows. The employee requirements are:

OBI at Least	But not More Than	Employees Required	Aggregate Hours Worked by Employees
\$0	\$250,000	One	1,200
\$250,001	\$500,000	One per owner	1,200
\$500,001	\$1,000,000	Two per owner	2,400
\$1,000,001	\$2,500,000	Four per owner	4,800
\$2,500,001	\$5,000,000	Ten per owner	12,000

If the employee ratio requirements are not met, then the distributions of income of a partnership or S corporation, as a percentage of ordinary business income, may not exceed 25 percent. The percentage is computed based on total distributions and total OBI for the current and most recent two tax years.

The only addition or subtraction allowed in the calculation of qualifying income is any depreciation adjustment directly related to the partnership, S corporation, or sole proprietorship.

Nonresident taxpayers who elect to use these rates may not join in the filing of a composite return under ORS 314.778.

A nonresident may apply reduced rates only to qualifying income earned in Oregon. Part-year residents calculate the tax due on the qualifying income based upon the proportion of qualifying income in Oregon to their qualifying income from all sources.

In 2018, the Legislature met in a special session to allow sole proprietors meeting the same nonpassive income and employment requirements as partnerships and S corporations to apply these preferential tax rates to qualifying business income (HB 4301). Legislation in 2021 (SB 139) modified the tax rates on qualifying income and created additional requirements for partnerships and S corporations related to total business income and employee requirements.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 3601 (2013), the purpose of allowing this preferential tax rate election “is to encourage small business growth and investment.”

WHO BENEFITS

Taxpayers who have qualifying income attributable to a partnership, S corporation, or sole proprietorship and who elect to be taxed at preferential rates. For tax year 2022, 25,200 personal income taxpayers saved an average of \$5,060 in Oregon tax using these reduced tax rates. The table below shows personal income tax usage of these tax rates for tax year 2022.

2022 Personal Income Tax Filers				
Income Group of Full-Year Filers*	Number of Filers Using Tax Rates	Average Revenue Impact	Revenue Impact (\$ millions)	Percent of Revenue Impact by Income Group
Below \$19,400	30	\$60	<\$0.1	<1%
\$19,400 - \$40,400	280	\$110	<\$0.1	<1%
\$40,400 - \$67,700	910	\$250	\$0.2	<1%
\$67,700 - \$117,800	2,780	\$500	\$1.4	1%
Above \$117,800	19,410	\$5,990	\$116.3	99%
All Full-Year Filers	23,400	\$5,040	\$117.9	100%
Part-Year and Nonresident Filers	1,800	\$5,310	\$9.6	

*Each income group contains 20 percent of the full-year filers (approximately 376,000)

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure may contribute to the strength of the Oregon economy by encouraging greater activity by certain smaller-sized companies with potential for high growth in employment and income generation. The department, however, lacks the data or direct experience to address it further.

1.503 INCOME AVERAGING FOR FARMERS

Oregon Statute: 314.297

Sunset Date: None

Year Enacted: 2001

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$1,300,000	\$1,300,000
2025-27	Not Applicable	\$1,300,000	\$1,300,000

DESCRIPTION

Personal income taxpayers may elect to average all or some of their current tax year’s farm income by shifting that farm income to the three prior years, when calculating their Oregon tax liability.

For the current year, the taxpayer subtracts their elected farm income from their total taxable income. The tax is then computed on that new value of taxable income using the current tax year’s tax rates. To that tax is added the cumulative increase in the tax that would result from adding one-third of the elected farm income to the taxable income for each of the three prior years.

The elected farm income can include gain on the sale of farm assets, with the exception of gain on the sale of land.

If the taxpayer has current tax year farm income higher than their taxable income for one or more of the three prior years, because of Oregon’s progressive tax rate structure, it is possible that the taxpayer’s tax liability computed by the farm income averaging method can be less than the tax liability computed by the normal method.

Even though the Oregon statute allowing income averaging for farmers does not have an explicit connection to the federal tax code for farm income averaging, the method in Oregon’s statute follows that in the federal tax code.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to allow personal income taxpayers to compute their Oregon personal income taxes on farm income following the federal farm income averaging method. According to the Congressional Research Service, the purpose of the federal provision is to mitigate the adverse tax consequences of fluctuating incomes under a progressive tax structure. By allowing farmers to smooth out income over several years, the provision aims to reduce the tax burden during years of high income, thereby providing more financial stability.

WHO BENEFITS

Taxpayers whose main source of income is agricultural production. In each year from 2018 to 2022 an average of about 600 individuals saved about \$1,100 of Oregon tax using this provision.

EVALUATION

Provided by the Oregon Department of Agriculture

The Income Averaging for Farmers provision may offer a valuable tool for mitigating the effects of income volatility that many farmers experience due to factors like fluctuating commodity prices and unpredictable weather conditions. By allowing farmers to average their income over three years, this provision may help stabilize their tax liabilities, making financial planning more manageable. This approach is consistent with federal tax policies, providing a streamlined method for farmers to align their state and federal tax strategies.

However, the benefits of income averaging may be limited to those farmers who experience significant income spikes, potentially excluding smaller operations or those with more stable income patterns. The provision may be particularly useful for long-established farmers who have the necessary income history to take full advantage of averaging. Eliminating this provision could lead to increased tax burdens in high-income years, potentially straining farmers' finances during periods of economic uncertainty.

1.504 CAPITAL GAINS FROM FARM PROPERTY

Oregon Statute: 316.045, 317.063, and 318.020

Sunset Date: None

Year Enacted: 2001

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Less than \$100,000	\$4,700,000	\$4,700,000
2025-27	Less than \$100,000	\$5,200,000	\$5,200,000

DESCRIPTION

If a taxpayer sells or exchanges capital assets used in qualified farming activities, a reduced tax rate of 5 percent is available on the realized capital gain. The sale or exchange must represent termination of all the taxpayer’s ownership interests in a farming business, or a termination of all the taxpayer’s ownership interests in property that is used in a farming business.

The sale of ownership interests in a farming corporation, partnership, or other entity qualifies for the special tax rate. A personal income taxpayer must have at least a ten percent ownership interest in the entity before the sale or exchange.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to lower the tax burden on farmers liquidating their farming businesses, allowing transition farmland to continue in farm use, and the owners to retain capital they have accumulated over years of investment in an operation.

WHO BENEFITS

Property owners who terminate a farming business benefit by realizing more of their capitalized equity. For tax year 2022, approximately 240 individuals saved an average of about \$8,800 of Oregon tax using this provision. Very few corporations benefit from this credit.

EVALUATION

Provided by the Oregon Department of Agriculture

Agricultural landowners build equity in their operations over time through ownership (debts, collateral), appreciation, and improvements. Years of work are capitalized into the land, buildings, and equipment used to operate a viable farm business, which represents the retirement savings for the farm family. Capital gains taxes can substantially reduce the retirement “savings” which can discourage and delay transitioning or selling farmland to the next generation. Many retired farmers lease or rent out their land because of the high cost to transition land including a capital gains penalty from selling. This behavior shifts the tax burden upon the owner's death to the next generation of farmers and ranchers. Reducing the cost of land transfers provides stability and opportunity for Oregon’s farming and ranching families.

The average age of farmers in Oregon is 60 years (up from 55 years in 2002). A study jointly completed by Oregon State University, Portland State University and Rogue Farm Corps, states that as older (Oregon) farmers retire over the next two decades, over 10 million acres, or 64 percent of Oregon's agricultural land, will pass to new owners. Lower capital gains rates for agriculture landowners achieves the purpose of an orderly transfer of ownership with a more secured retirement for older farmers. Lower capital gains taxes also support Goal 3 (to preserve and maintain agricultural lands) in Oregon's Statewide Planning Goals and Guidelines for Land Use by keeping farmland in agricultural use. To maximize the effectiveness of this provision, it may be beneficial to consider additional measures that encourage the sale of farmland specifically to other agricultural producers or to entities committed to maintaining the land in agricultural use.

1.505 NONRESIDENT DISASTER RELATED INCOME

Oregon Statute: 401.690

Sunset Date: None

Year Enacted: 2015

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Available	Not Available	Not Available
2025-27	Not Available	Not Available	Not Available

DESCRIPTION

An out-of-state emergency service provider, whether a business or an individual, is exempt from corporate or personal income tax when operating solely for the purpose of performing disaster or emergency-related work on critical infrastructure in Oregon. For purposes of this exemption, a disaster must have been declared to exist within this state by the President of the United States or the Governor of Oregon.

This tax expenditure generally grants these benefits for disaster or emergency-related work conducted by an out-of-state business:

- The activity may not be used as the sole basis for determining that a corporation is doing business in Oregon.
- The business income from the activity is not considered for apportionment of corporate income to Oregon.
- Income from the activity cannot be the sole basis of imposition of corporate income and excise taxes on the business.

For individuals, an out-of-state employee who performs disaster or emergency-related work during a declared emergency is not taxed as a resident, nonresident, or part-year resident, is not considered to have established domicile or residence in this state, and is not subject to withholding.

Businesses and individuals exempt under this provision are still required to pay appropriate transaction taxes and fees, such as the lodging tax, except as otherwise exempted by law.

Legislation in 2019 (HB 2127) removed any sunset under ORS 315.037 for this tax expenditure.

PURPOSE

“To ensure that businesses may focus on quick response to the needs of this state and its residents during a declared disaster or emergency, it is appropriate for the Legislative Assembly to deem that this activity for a reasonable period of time before, during and after the disaster or emergency for repairing and restoration of the often devastating damage to critical infrastructure in this state as defined in section 3 of this 2015 Act does not establish presence, residency, doing business in this state or any other criteria for purposes of state and local taxes or licensing and regulatory requirements.” (ORS 401.680(5))

WHO BENEFITS

Out-of-state companies and employees providing disaster or emergency related services in Oregon.

EVALUATION

Provided by the Oregon Department of Emergency Management

To date Oregon has not suffered from a catastrophic disaster which would require a massive influx of individuals or companies to come in and assist the State in recovery operations. The end goal of the legislation is to ease the barriers of entry for private industry in order to encourage support and investment to help expedite Oregon’s recovery from catastrophic disasters.

1.506 APPORTIONMENT FOR UTILITY AND TELECOMMUNICATION COMPANIES

Oregon Statute: 314.280

Sunset Date: None

Year Enacted: 2001

	Revenue Impact		
	Corporation	Personal	Total
2023-25	\$800,000	Not Applicable	\$800,000
2025-27	\$800,000	Not Applicable	\$800,000

DESCRIPTION

Corporate taxpayers primarily engaged in the business of utilities or telecommunications may elect to apportion their business income to Oregon using an apportionment formula based on the double-weighted sales factor instead of the apportionment formula currently in place. Currently, the apportionment formula is based purely on Oregon sales relative to sales in all states. The double-weighted sales factor is calculated as 50 percent of the sales factor plus 25 percent of the property factor and 25 percent of the payroll factor.

Utilities and telecommunications firms may elect to use this alternative apportionment formula until they decide to revoke it. Election and revocation are done according to rules established by the Department of Revenue. An election applies to the tax year for which the election is made and for each subsequent tax year until a revocation. A revocation applies to the tax year following the year in which the revocation is made and to all subsequent tax years. Because corporate taxpayers presumably use the method that results in the lowest tax liability, tax revenue from these corporations will be lower at least for the first year of using the alternative apportionment formula than it would be if either apportionment formula applied to all corporations.

PURPOSE

“...so as fairly and accurately to reflect the net income of the business done within the state...” (ORS 314.280).

WHO BENEFITS

Utility and telecommunication firms benefit by being able to choose between double-weighted sales and the current apportionment formulas for telecommunication and utility firms established by ORS 314.280. On average, fewer than 20 corporate taxpayers benefit from this alternative apportionment formula each year.

EVALUATION

Provided by the Oregon Public Utility Commission

The state has deemed that allowing utilities and telecommunications companies to use the alternative apportionment formula provides a “fair and equitable” allocation of a corporate taxpayer's business income to Oregon. Firms that choose the alternative formula lower their Oregon tax liability and retain the benefit.

1.507 NONRESIDENT ARMED FORCES

Federal Code: 50 U.S.C. § 4001

Sunset Date: None

Year Enacted: 1942

	Revenue Impact		
	Corporation	Personal	Total
2023-25	Not Applicable	\$11,100,000	\$11,100,000
2025-27	Not Applicable	\$11,800,000	\$11,800,000

DESCRIPTION

Compensation paid by the United States for service in the Armed Forces of the United States performed in Oregon by a nonresident does not constitute income derived from sources within the state.

For tax purposes, a servicemember and their spouse may elect to use

- the residence or domicile of the servicemember,
- the residence or domicile of the spouse, or
- the permanent duty station of the servicemember.

See [1.329, Military Active Duty and Related Pay](#) for the Oregon subtraction from taxable income for certain military-related income.

PURPOSE

The statute that allows this tax expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2171 (2015), the purpose of this subtraction “... is to provide tax relief to service members ... in consideration of their work and sacrifices for their state and country.”

WHO BENEFITS

Nonresident Armed Forces workers who perform service in Oregon.

EVALUATION

Provided by the Oregon Military Department

This tax expenditure achieves its purpose and is a valuable benefit to members of the National Guard, as well as other military personnel assigned to the State of Oregon in an active duty status. This benefit ensures that personnel assigned to an installation within the borders of this state, but who retain residence in another state are not subject to Oregon income tax. This is a valuable benefit to military personnel who may choose to leave their families in another state as they fulfill their active duty mission in Oregon. This alleviates an additional tax burden on these families who are already sacrificing by having their family member(s) serving in another state. The number of personnel impacted by this expenditure is limited as there is a very small active duty presence within Oregon.

1.508 NONRESIDENT SPOUSE OF NONRESIDENT SERVICEMEMBER SERVING IN OREGON

Federal Code: 50 U.S.C. § 4001

Sunset Date: None

Year Enacted: 2009

Revenue Impact			
	Corporation	Personal	Total
2023-25	Not Applicable	Not Available	Not Available
2025-27	Not Applicable	Not Available	Not Available

DESCRIPTION

Under federal law—the Military Spouses Residency Relief Act—enacted in 2009, the spouse of a servicemember shall not be considered a resident of a state if they are in the state solely to be with the servicemember while the servicemember is stationed in the state.

For tax purposes, a servicemember and their spouse may elect to use

- the residence or domicile of the servicemember,
- the residence or domicile of the spouse, or
- the permanent duty station of the servicemember.

Income for services performed by the spouse of a servicemember shall not be deemed to be income for services performed or from sources within Oregon if the spouse is not considered a resident of the state.

Federal law was amended in 2018—the Servicemembers Civil Relief Act—to allow a spouse of a servicemember to elect to use the same residence for the purposes of taxation as the servicemember elects.

In effect, these laws exclude from taxable income earnings of spouses of servicemembers who are relocated to Oregon from out-of-state if the spouse does not elect to be an Oregon resident for tax purposes.

PURPOSE

To comply with federal law.

WHO BENEFITS

Nonresident spouses of nonresident servicemembers living and working in Oregon.

EVALUATION

Provided by the Department of Revenue

This expenditure complies with federal law and also relieves the specified taxpayers of the difficulty of determining the portion of income earned in Oregon while working in the state.

CHAPTER 2. PROPERTY TAX

The property tax is Oregon’s second largest source of revenue, providing most of the revenue for nonschool local governments and roughly one quarter of the revenue for school districts. Total property taxes imposed, including taxes for urban renewal agencies, are forecast to total \$18.7 billion in the 2023–25 biennium and \$20.4 billion in the 2025–27 biennium.

The major features of Oregon’s property tax system are largely defined by two voter-approved ballot measures: Measure 5 in 1990 and Measure 50 in 1997. Measure 5 placed constitutional limits on the amount of tax that could be levied on a property for most purposes. Measure 50 cut property taxes and made three fundamental changes to the structure of the property tax system: first, it replaced most tax levies with limited permanent tax rates; second, it rolled back the assessed value of every property in the state to 90 percent of its 1995–96 assessed value; and third, it limited the future growth in each property’s maximum assessed value to 3 percent per year.

The Department of Revenue also publishes an annual report that provides detailed statistics on Oregon’s property tax system. The most recent edition of *Oregon Property Tax Statistics* can be found at www.oregon.gov/DOR/Stats.

Property Tax Expenditures

The base for taxation for property taxes is generally all real property and all tangible personal property in Oregon and is set by ORS 307.030. Tax expenditures occur when certain property is excluded from some or all taxation, or has reduced taxable value. There are three primary types of property tax expenditures: full exemption, partial exemption, and special assessment.

With a full exemption, a property’s entire value is exempt from all property taxes.

Partial exemptions reduce, but do not eliminate, the taxes on a property, and they exist in several different forms. For example, an exemption program may exempt only improvement value, but the land value continues to be taxed. Other properties may be exempt from the taxes imposed by the local city but still pay property taxes for schools and other districts. Some exemptions apply only to taxing districts that have opted in, or have not opted out, of the tax exemption program.

The final primary type of property tax expenditure is known as a special assessment. Specially assessed properties are assigned a property value using an assessment technique that results in a lower taxable value than would be the case if the usual assessment practice were used.

A property receiving an exemption (or special assessment) has its maximum assessed value reset at the end of the exemption by multiplying the real market value of the property by the changed property ratio, generally a ratio of the average maximum assessed value for similar properties in the county divided by the average real market value of similar properties in the county. This makes the property tax unique, in that a property that stops receiving an exemption may have a higher tax than it would have had if it never received the exemption in the first place. In some circumstances, a taxpayer would be better off not to ever receive the exemption. It also means that a property that stops receiving an exemption may still benefit after the exemption is over.

Revenue Loss and Shift

The revenue impact for property tax expenditures consists of two components: revenue loss and shift. Most property taxes levied in Oregon are through fixed tax rates. With these levies if a property is exempt from taxation then the taxing district simply raises less money than if the property were taxable. This direct loss of tax revenue is the much larger impact of property tax exemptions and special assessments and is reported here as the “loss.”

Some levies, mostly bond levies to repay debt, do not have a fixed tax rate and instead calculate the tax rate each year by dividing the amount of tax revenue needed that year across the value of all taxable properties. In these cases, if a property is exempt from tax the effect is to raise the overall tax rate on the remaining taxable properties. Therefore, the final amount of tax raised for the district will remain the same because the tax burden is shifted to the other properties. The amount of tax that would have been paid by the exempt properties that is instead paid by the remaining taxable properties is reported here as the “shift.” More than 80 percent of all property taxes are from fixed tax rates, so the revenue losses due to property tax exemptions are much larger than the shifts.

Property tax expenditures also interact with other parts of the public finance system, especially school funding. Approximately 40 percent of all property taxes are imposed to pay for K-12 schools. Because the state General Fund

also provides funding for schools using a statewide funding formula, some of the property tax revenue lost to school districts from tax expenditures is replaced by state funding. Therefore, property tax exemptions have an indirect effect on the state General Fund. This replacement component is not included in the revenue impacts reported here. For all property tax expenditures, the detailed descriptions report both the revenue loss and shift separately, while the Index of Tax Expenditures at the beginning of this report includes only the loss.

Whenever possible, the exempt assessed value is obtained from county or DOR property tax reporting. For some expenditures, the assessed value of the exempt properties is estimated using other data sources.

2.001 ACADEMIES, DAY CARE, AND STUDENT HOUSING

Oregon Statute: 307.145

Sunset Date: None

Year Enacted: 1957

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.5 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$78,800,000	\$19,300,000
2025-27	\$85,500,000	\$20,900,000

DESCRIPTION

Property owned by a charitable or religious organization that is used for childcare facilities, schools, academies, or student housing is exempt from property taxation under this provision. Childcare facilities must be regulated by the Office of Child Care at the Department of Early Learning and Care unless exempted by rule. Prior to the passage of HB 3073 (2021), the facilities were regulated by the Office of Child Care in the Early Learning Division at the Department of Education. To qualify, the property must be used for educational purposes. The organization must file an application with the county assessor to claim the exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to maintain tax treatment for certain school and childcare properties that is comparable to the treatment provided to similar organizations under [2.085, Charitable, Literary, and Scientific Organizations](#).

WHO BENEFITS

Approximately 840 schools and day care properties were exempt in fiscal year 2023–24.

EVALUATION

Provided by the Department of Early Learning and Care

This tax expenditure is used by organizations that qualify through preschool programs administered through the Oregon Department of Education’s Early Learning Division – Oregon Prekindergarten and Preschool Promise. It reduces costs of these programs, which helps lay the groundwork for a child’s intellectual, emotional, social, and physical development. It also helps children get a good start in life by supporting strong parenting, appropriate education, and adequate nutrition and health care. The Oregon Prekindergarten and Preschool Promise programs serve children who are below the federal poverty level. Studies have shown that participation in a quality preschool program increases the chances of a child successfully completing school and holding a job while decreasing the chances of dropping out of school and needing public assistance. Money invested in our youth through this program means less money will be required later for more costly programs. It is a fiscally effective method of achieving its purpose.

2.002 STUDENT HOUSING FURNISHINGS

Oregon Statute: 307.195

Sunset Date: None

Year Enacted: 1957

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.5 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

All personal property, furniture, goods, and furnishings in a student housing cooperative, fraternity, or sorority are exempt from property taxation so long as the housing is not rented out for profit.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce the costs associated with college housing. In conjunction with 2.095, this expenditure provides equitable treatment with those students living on campus in publicly owned dormitories; see 2.003, for more information.

WHO BENEFITS

Nonprofit organizations that rent furnished units to college students, which in turn benefits students by reducing rental rates.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure achieves its purpose. As with real property taxes, the tax exemption on personal property for not-for-profit student housing is a valuable provision in minimizing housing costs for students. It is a fiscally effective means of achieving its purpose, as housing expenses typically carry some of the highest financial burden on postsecondary students.

2.003 LEASED STUDENT HOUSING PUBLICLY OWNED

Oregon Statute: 307.110(3)(a)

Sunset Date: None

Year Enacted: 1947

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.2 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$37,200,000	\$8,900,000
2025-27	\$41,800,000	\$10,000,000

DESCRIPTION

Generally, state-owned housing that is rented is taxable. However, publicly owned property that is rented or leased for housing purposes to students attending a school or college is exempt from property tax. This provision applies to all student housing, such as residence halls and student family housing, owned by public universities and leased to students. Residence halls owned by private colleges generally fall under tax expenditure 2.001. This provision is an exception to the general rule that public property is taxable when held under contract of sale or leased to a private individual or business.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce the costs associated with college housing.

WHO BENEFITS

Approximately 15,300 students who lease rooms or apartments from eight public university campuses.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure achieves its purpose and is critical to minimizing the cost of student housing. Housing costs are, on average, the highest expense for students, particularly at a time when their income generation is limited and generally committed to education expenses. More than one-third of students who apply for financial aid (possibly more, as data are limited) cannot afford the cost of postsecondary education and training, even with expected financial aid grants,

institutional grants, their own expected earnings, and expected family contributions. Exempting these properties from taxes contributes to lower housing costs and greater access to higher education.

2.004 HIGHER EDUCATION PARKING SPACE

Oregon Statute: 307.110(3)(f)

Sunset Date: None

Year Enacted: 1989

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.078, State and Local Property](#)

	Revenue Impact	
	Loss	Shift
2023-25	Included in 2.078	Included in 2.078
2025-27	Included in 2.078	Included in 2.078

DESCRIPTION

State-owned property rented for public parking is generally taxable. However, state property owned by public universities and rented to employees, students, or visitors for parking use is exempt from property tax. University spaces are taxable when rented to members of the general public who are not employees, students, or visitors.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce the costs associated with attending, visiting, or working at a public university.

WHO BENEFITS

All eight higher education campuses rent parking spaces to students, employees, and visitors. Some are paved lots and others are parking structures built with bond revenue.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure achieves its purpose and is an additional element in providing access to higher education. Reducing the cost of parking for students, who generally have a severely limited income, is another means of lowering the cost of attending colleges and universities. Applying this exemption to all parking eliminates the administrative costs of separately tracking student and employee parking.

2.005 PRIVATE LIBRARIES FOR PUBLIC USE

Oregon Statute: 307.160

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.5 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Private property used as a library open to the public is exempt from property taxation. The exemption includes the real property, books, and furnishings dedicated to library use. Privately owned libraries open to the general public use the exemption while publicly owned libraries are exempt under tax expenditure [2.078, State and Local Property](#). The owner must file an application with the county assessor to claim the exemption. (ORS 307.162)

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to broaden the application of tax expenditure 2.085, *Charitable, Literary, and Scientific Organizations* exemption, to public or private libraries, acknowledging the public contribution of these efforts as activities and services that relieves government from having to provide the same.

WHO BENEFITS

Ten libraries use this exemption within Benton, Lane, Multnomah, and Tillamook counties.

EVALUATION

Not evaluated.

2.006 LEASED RURAL HEALTH CARE PROPERTY

Oregon Statute: 307.110(3)(i)

Sunset Date: None

Year Enacted: 1999

2023-24 Estimated Reduction in the Taxable Assessed Value: \$13 million

	Revenue Impact	
	Loss	Shift
2023-25	\$400,000	Less than \$100,000
2025-27	\$500,000	Less than \$100,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. This tax expenditure exempts the property of a health district if the property is leased or rented for purposes of providing facilities for health care practitioners. The health district must reside in a frontier rural practice county, as defined by the Office of Rural Health. In 2024, ten counties were included in this category: Baker, Gilliam, Grant, Harney, Lake, Malheur, Morrow, Sherman, Wallowa, and Wheeler.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage medical practitioners to practice in rural areas by extending the public health district property tax exemption to property leased by health districts to private taxable entities.

WHO BENEFITS

In 2023-24, there were seven accounts receiving this exemption across two counties.

EVALUATION

Provided by the Office of Rural Health

This modest benefit costs local governments less than \$500,000 per biennium and affects only ten Oregon counties. It allows very fragile rural hospitals that are located in “frontier” communities to use a portion of their property to provide office space for physicians, without incurring a tax liability on those properties. Provision of adequate and convenient office space is often a critical factor in the recruitment and retention of rural physicians. Passage of this law has allowed Harney District Hospital to complete new office suites for its physicians and played a significant role in Wallowa Memorial Hospital in Enterprise building a badly needed new facility.

2.007 SENIOR SERVICES CENTERS

Oregon Statute: 307.147

Sunset Date: None

Year Enacted: 1993

2023-24 Estimated Reduction in the Taxable Assessed Value: \$16 million

	Revenue Impact	
	Loss	Shift
2023-25	\$400,000	Less than \$100,000
2025-27	\$500,000	\$100,000

DESCRIPTION

Property that is owned by a nonprofit organization and used for senior services and qualified activities is exempt from property tax. To qualify, the property must be primarily used to provide services and activities to people over age 50. Eligible services and qualified activities include food service programs, exercise and health screening, estate planning, crafts workshops, and dances or celebrations. If the property is used primarily for fund raising or as living quarters, then the exemption is not allowed. The nonprofit organization must file an application with the county assessor to claim the exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage organizations to provide services to senior citizens.

WHO BENEFITS

Thirty-six property tax accounts received this exemption in tax year 2023-24.

EVALUATION

Provided by the Oregon Department of Human Services

While this tax does exempt properties that do not meet the requirements of tax expenditure [2.085, Charitable, Literary, and Scientific Organizations](#), one concern is the restriction placed on fundraising. This condition often translates into a choice for senior service centers between fundraising and this property tax exemption. It is not likely that many centers will opt for the exemption over the fundraising, so questions of applicability and efficiency of this tax expenditure arise.

2.008 LAND OWNED BY NONPROFIT FOR PURPOSE OF BUILDING LOW-INCOME HOUSING

Oregon Statute: 307.513

Sunset Date: 06-30-2029

Year Enacted: 2015

2023-24 Estimated Reduction in the Taxable Assessed Value: \$3.6 million

	Revenue Impact	
	Loss	Shift
2023-25	\$100,000	Less than \$100,000
2025-27	\$100,000	Less than \$100,000

DESCRIPTION

Land acquired and held by a nonprofit corporation for the purpose of building residences to be sold to certain individuals is exempt from property tax. This exemption only applies to the land on which the residences are to be built.

To qualify for this exemption the residences must be sold to individuals whose income is not greater than 80 percent of area median income, adjusted for family size. In addition, the nonprofit corporation must have sold at least one residence to a qualifying person in the 10 years prior to claiming this exemption. The exemption can last for up to 7

years, or 10 years if a request for an extension is filed timely. The exemption expires before the 7- or 10-year limit when the corporation transfers title to the residence(s) or the land.

This exemption has the potential for additional taxes to be due if the property is disqualified from exemption or the property is sold to a non-qualifying individual.

Legislation in 2019 (HB 2130) extended the scheduled sunset of this exemption to June 30, 2029.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2690 (2015): “The policy purpose of this measure is to provide tax relief to land owning nonprofit corporations building residences to be sold to lower income individuals thus encouraging the development and availability of low income housing.”

WHO BENEFITS

Land-owning nonprofit corporations building residences to be sold to lower income individuals. Counties reported 37 property tax accounts receiving this exemption in tax year 2023-24.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose of supporting affordable housing providers and developers. By allowing a property tax exemption to nonprofit corporations, the cost of holding land and therefore the cost of development is decreased. This modest savings allows nonprofit corporations to acquire land for eventual development without incurring recurring tax costs. In addition the tax savings allows for homes to be built with fewer subsidies, which then better enables the nonprofit corporations to set purchase prices so that they are affordable to households earning at or below 80 percent area median income.

2.009 AGRICULTURAL HOUSING AND DAY CARE FACILITIES

Oregon Statute: 307.485

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: \$36 million

	Revenue Impact	
	Loss	Shift
2023-25	\$800,000	\$200,000
2025-27	\$900,000	\$200,000

DESCRIPTION

Eligible agricultural workforce housing and farm labor camps for farm laborers, as well as eligible day care facilities operating in conjunction with those housing facilities, are exempt from property tax. All property eligible for this exemption must be owned or operated by a nonprofit corporation. Community-based eligible agricultural workforce housing provides occupancy to active, retired, or disabled agricultural workers and their families. To be eligible, the housing must comply with applicable building codes. An eligible farm labor camp is a place where housing, sleeping places, or campgrounds provide occupancy in compliance with applicable safety and health standards for agricultural labor housing. Eligible child care facilities must be in compliance with the Department of Early Learning and Care and operated in conjunction with eligible farm labor housing.

An exemption claim with supporting documentation must be made each year with the county assessor.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2610 (2015), the purpose of this exemption “... is to expand the availability of low cost housing

and child care facilities for agricultural workers and their families, so long as the property meets applicable safety and health standards.”

WHO BENEFITS

Nonprofit owners and operators of agricultural workforce housing, farm labor camps and associated day care facilities. In tax year 2023-24, counties reported 22 exempt tax accounts in six counties; most are located in Umatilla, Morrow, or Marion counties.

IN LIEU

In lieu of real and personal property taxes, the nonprofit corporation owning or operating the exempt agricultural workforce or farm labor housing must make annual payments to the county treasurer equal to 10 percent of net rental income from the previous year.

Nonprofit corporations operating agricultural workforce or farm labor housing do not usually have a net rental income after depreciation, and generally make no in lieu of tax payments. When payments are made, they are usually small. Any funds collected are distributed to taxing districts where the exempt property is located.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose of supporting housing and service providers. Without the tax exemption, the associated day care facilities and agricultural housing may not be built or rehabilitated at all. Assuming that the difference between (a) the amount of property taxes that would be owed without this statute and (b) the amount of the payment in lieu of taxes that in fact is paid under the statute is passed along to the residents, then the benefit of the tax expenditure is easily calculated by the amount of the reduced rent or day care cost.

While an administrative improvement would be to eliminate the requirement that an application be filed every year, it is probably the trigger mechanism needed for the annual health and safety inspections.

2.010 FAIRGROUND LEASED STORAGE SPACE

Oregon Statute: 307.110(3)(d) and (e)

Sunset Date: None

Year Enacted: 1987

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. This tax expenditure provides an exception to that general rule. County or state fairground land or buildings are exempt from property tax if they are used for certain purposes in addition to county fair use. Usage described in ORS 565.230(2), such as, exhibitions, shows, carnivals, circuses, dances, entertainment, or public gatherings qualifies. Storage of recreational vehicles or farm machinery and equipment and use of horse stalls also qualify.

While leasing storage space for livestock and equipment at fairgrounds is common, the duration of the leases are short enough and the sizes of space being leased small enough to make the revenue impact minimal.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to promote fairs by allowing fair boards to earn more revenue throughout the off-season to support fairs. Boards can receive higher rent because the renter pays no property taxes.

WHO BENEFITS

All 36 counties in Oregon hold county fairs; 34 counties have fairgrounds and most are able to benefit from this exemption. The Oregon State Fair and Exposition Center has minimal leased property that is exempt under this statute.

EVALUATION

Not evaluated.

2.011 COMMERCIAL BUILDINGS UNDER CONSTRUCTION

Oregon Statute: 307.330

Sunset Date: None

Year Enacted: 1959

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.5 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$77,000,000	\$18,700,000
2025-27	\$84,500,000	\$20,500,000

DESCRIPTION

Certain commercial and industrial buildings are exempt from property taxation while they are under construction. A new structure or an addition is exempt from property taxation if meeting the following criteria on the January 1 assessment date:

- The property is under construction, including additions to an existing structure.
- No part of the new structure or improvement has been or is in service for any commercial use or occupancy.
- The property is being built for the purpose of earning income.
- The property is not to be occupied for at least one year after construction began in the case of any non-manufacturing facility.
- The property is not centrally assessed by the Department of Revenue.

The exemption cannot be claimed for more than two consecutive years. Machinery and equipment at the building site also qualifies if it will be installed as real property in the structure. The property is listed on the county property tax assessment roll, but the assessment is canceled if proof that the property meets the above requirements is furnished to the assessor by April 1 of each assessment year.

The revenue impact estimates include those from the related tax expenditure [2.012, Construction in Process in an Enterprise Zone](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage business investment in plant and equipment by delaying property taxes until a facility can generate cash revenue. Manufacturing firms do not commonly experience immediate cash flow.

WHO BENEFITS

In fiscal year 2023–24, 68 properties were exempt under this expenditure or under [2.012, Construction in Process in an Enterprise Zone](#). The use of this provision is driven by construction projects and fluctuates significantly. The majority of the exempt value is in Multnomah and Washington counties.

EVALUATION

Provided by the Oregon Business Development Department

This expenditure achieves its purpose by allowing new traded-sector investments to delay paying property taxes until they are much more likely to be able to earn revenue. Economic consequences are also relevant. New construction and

investments might be significantly deterred by the additional up-front cost of paying property taxes on partially finished but still unproductive property.

This expenditure is administratively effective and efficient. Alternatives to this expenditure would be to refund such taxes through direct payments or credits on other taxes. The administrative burdens and complexity of such alternatives suggest that the current exemption is preferable.

This program might be underutilized, probably because it is not widely known outside Portland and other metropolitan areas (as noted above, aside from utilization with enterprise zones and the sister expenditure of [2.012, Construction in Process in an Enterprise Zone](#), Construction in Process in an Enterprise Zone); administrative technicalities may also limit accessibility. Otherwise, although manufacturing operations are favored, this expenditure has been available to any industry sector consistent with its purpose for more than 50 years.

2.012 CONSTRUCTION IN PROCESS IN AN ENTERPRISE ZONE

Oregon Statute: 285C.170

Sunset Date: None (enterprise zone program sunsets 06-30-2032, except for reservation enterprise and reservation partnership zones)

Year Enacted: 2003

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.011, Commercial Buildings Under Construction](#)

	Revenue Impact	
	Loss	Shift
2023-25	Included in 2.011	Included in 2.011
2025-27	Included in 2.011	Included in 2.011

DESCRIPTION

Property undergoing construction, addition, modification, or installation is exempt from property taxation for up to two consecutive years provided that the property satisfies all the following requirements:

- Located in a current enterprise zone.
- Owned or leased by a business firm authorized by the local zone sponsor and county assessor to receive the standard enterprise zone exemption on qualified property – expenditure [2.013, Enterprise Zone Businesses](#).
- Will be qualified property upon completion, in that there is no known reason to conclude that the property or firm will not satisfy the requirements for [2.013, Enterprise Zone Businesses](#).
- Has not been exempt under [2.011, Commercial Buildings Under Construction](#).
- Not centrally assessed.
- Will not be operated as a hotel, motel, or destination resort.

This exemption is effectively an extension of expenditure [2.011, Commercial Buildings Under Construction](#), specifically to properties that are expected to qualify for a standard enterprise zone exemption ([2.013, Enterprise Zone Businesses](#)) when they are completed. If a property is exempt under [2.011, Commercial Buildings Under Construction](#) in a subsequent year, the combined duration of the exemptions cannot exceed two consecutive years. Recent legislation (HB 2009, 2023) extended the sunset date for the enterprise zone program to June 30, 2032.

PURPOSE

“To stimulate and protect economic success ... throughout all regions of the state, but especially in those communities at the center of or outside major metropolitan areas for which geography may act as an economic hindrance ... by providing tax incentives for employment, business, industry and commerce and by providing adequate levels of complementary assistance to community strategies for such interrelated goals as environmental protection, growth management and efficient infrastructure” (ORS 285C.055).

WHO BENEFITS

See 2.011, [Commercial Buildings Under Construction](#).

EVALUATION

Provided by the Oregon Business Development Department

This program has achieved its purpose in allowing for a more straightforward message about the new property that is exempt in an enterprise zone – both before (under this expenditure) and after that property is placed in service (under 2.013, [Enterprise Zone Businesses](#)). Most such standard enterprise zone projects, if they still have property in the process of construction/installation on January 1, will be able to avail themselves of this exemption. Consequently, this tax expenditure has contributed to the ability of Oregon’s enterprise zone system to attract and spur development, and new employment, in especially interested and economically distressed parts of Oregon. It will also smooth out administration of property subject to exemption over the course of taxpayer’s investment

In the absence of this tax expenditure, most affected property could otherwise be exempt under the rather longstanding tax expenditure 2.011, [Commercial Buildings Under Construction](#). At times, however, that exemption will cover less property. Additional coverage under this provision compared to 2.011, [Commercial Buildings Under Construction](#) includes:

- A project of an authorized business firm with no new construction or additions to a building or structure, but rather only modifications to or installations of qualified property that were incomplete but still had an appreciable effect on valuations as of a given January 1 assessment date
- Property items that once fully installed will remain personal property
- Real property machinery and equipment installed directly on land and not inside a building or otherwise affixed to a structure
- Nonmanufacturing facility (e.g., a distribution center) necessitating less than 12 months to build
- Property that is still in the process of construction, reconstruction, modification or installation in a year after another part of the same facility or building has already been placed in service—property is effectively severable with this program in contrast to 2.011, [Commercial Buildings Under Construction](#).

Data do not exist in order to isolate and analyze usage of this tax expenditure independent of 2.011, [Commercial Buildings Under Construction](#), because they are essentially interchangeable and operate through parallel filing systems (for which there is not specific data collection in any case). The differences between the expenditures are transitory and tend to involve factors that would only modestly affect total market value. Though in certain cases, the last two bullets above could entail substantial property tax abatement in a given year.

2.013 ENTERPRISE ZONE BUSINESSES

Oregon Statute: 285C.175

Sunset Date: None (enterprise zone program sunsets 06-30-2032, except for reservation enterprise and reservation partnership zones)

Year Enacted: 1985

2023-24 Estimated Reduction in the Taxable Assessed Value: \$3.6 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$98,100,000	\$22,100,000
2025-27	\$190,000,000	\$46,000,000

DESCRIPTION

Qualified real and personal property owned or leased and newly placed into service by a qualified business firm in an enterprise zone is exempt from property tax for three to five consecutive years. A new or expanding business can qualify for this exemption if the business meets all the conditions outlined in ORS 285C.135 and 285C.200, such as

applying locally for authorization prior to construction, engaging in eligible business operations, entering into a first source hiring agreement with local publicly funded job training providers, and increasing the number of jobs in the enterprise zone by the greater of one additional job or 10 percent. By resolution, the local zone sponsor may waive the requisite increase in jobs under special circumstances. Recent legislation (HB 2009, 2023) extended the sunset date of the enterprise zone program to June 30, 2032.

To be exempt, the property owned or leased by the business must satisfy timing, location, minimum cost, and other requirements described in ORS 285C.180. Property is disqualified if used for an ineligible activity, such as retail operations, or if the business firm substantially curtails operations or closes during the exemption period. When property becomes disqualified, previously abated amounts must be repaid.

The default length of the exemption period is three years, but for many of the larger projects and nearly all projects in the Portland metropolitan region, the length of the exemption is five years. The additional two years of exemption depend on a written agreement executed prior to local authorization between the business firm and the local zone sponsor, which may stipulate additional requirements for the firm. New jobs of the firm (except in the Portland and Salem area urban zones) need to also satisfy special criteria for employee pay, which the Legislature modified in 2017. HB 2009 (2023) added a requirement that in the fourth and fifth years of the exemption period, the business pays a fee to the local school for the support of the statewide school system. The zone sponsor and school district must have previously established the rate for the fee between 15 and 30 percent of each year's total tax savings, as also applies to latter years of [2.014, Long Term Rural Enterprise Zone \(Property Tax\)](#).

Any urban enterprise zone may also impose additional conditions related to employment opportunities on any authorized business firm regardless of the exemption period.

Enterprise zones are sponsored, designated, and amended by city, port or county governments, subject to determination by the Oregon Business Development Department (OBDD) of compliance with economic criteria, local taxing district consultations and other statutory requirements.

In addition, nine federally recognized Indian Tribes can each have OBDD designate one reservation enterprise zone comprising any of their tribal lands, or they may create any number of contiguous reservation partnership zones with a local government. These tribal zones are otherwise enterprise zones, but they may continue after 2025, and this expenditure does not sunset for purposes of tribally based designations. Businesses in a tribal zone, even ones not eligible for this exemption, might be able to claim a state income tax credit, see expenditure [1.419, Reservation Enterprise Zone \(Income Tax\)](#).

As of August 2024, Oregon had 73 enterprise zones, of which 55 are categorized as rural, and 18, as urban. They are spread throughout the state in 34 of the 36 counties and sponsored by 119 cities, 15 ports, 29 counties, and 2 Indian Tribes. In addition, 20 cities, 7 ports and 3 other counties formally consent to zones within their territory that are sponsored by other jurisdictions.

All enterprise zones terminate after 10 to 11 years. A qualified business receiving this exemption when the zone terminates may continue to receive the exemption for the number of years for which it qualified.

The relationship and comparison of this tax expenditure to others in this report are summarized as follows:

- Property of an authorized business under construction or in the process of being installed in the enterprise zone is generally allowed an exemption upon annual filing for [2.012, Construction in Process in an Enterprise Zone](#) of up to two consecutive years.
- Up to 15 enterprise zones may also be designated as an Electronic Commerce Enterprise Zone. In addition to the expenditure here—but with some expanded eligibility for business activities and lower cost minimum for many types of personal property items—this overlay designation formerly allowed businesses qualifying for this tax expenditure to also claim an Electronic Commerce Enterprise Zone Income Tax Credit on certain capital expenses incurred prior to the business's 2018 income tax year.
- Facilities specially approved by the zone sponsor in most rural enterprise zones may alternatively use [2.014, Long Term Rural Enterprise Zone \(Property Tax\)](#). Its 7 to 15-year tax abatement differs from the standard exemption here in terms of its approval process, length of exemption period, the treatment of property under construction, necessary county location, required minimum investment and employment criteria.

Projects in a Rural Renewable Energy Development (RRED) Zone as described in [2.018, Rural Renewable Energy Development Zone](#) may receive the same standard enterprise zone exemption as this expenditure, but the RRED Zone program differs in four ways: 1) only certain types of renewable energy projects are eligible; 2) the zone areas are more expansive, generally countywide; 3) there is a locally determined limit of up to no more than \$250 million for all exemptions with a given RRED Zone designation; and 4) the exemption does not sunset for purposes of RRED Zones.

PURPOSE

“To stimulate and protect economic success ... throughout all regions of the state, but especially in those communities at the center of or outside major metropolitan areas for which geography may act as an economic hindrance ... by providing tax incentives for employment, business, industry and commerce and by providing adequate levels of complementary assistance to community strategies for such interrelated goals as environmental protection, growth management and efficient infrastructure” (ORS 285C.055).

WHO BENEFITS

Eligible businesses operating in an enterprise zone (or engaged in e-commerce operations in an electronic commerce city). Many of these businesses are manufacturers, across a wide array of subsectors, but they also include financial/service centers, headquarters, data centers, distribution facilities, hotels in some zones by local choice, and various other traded-sector business types.

IN LIEU

Businesses may make payments imposed by or agreed to with the zone sponsor under special cases provided in statute for reasonable additional local requirements. If a business is not satisfying certain program requirements, a one-time payment of that year’s tax savings (PiLoD) may be made to the zone sponsor to avoid fully retroactive disqualification. Some applications or property tax filings also entail administrative fees.

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure achieves its purpose. The program continues to be associated with numerous job-creating investments (mostly by in-state companies), located in more economically challenged areas of Oregon. The jobs should help improve the material quality of life for many existing residents through employment opportunities and in indirect ways. Although a few zones have been unable to foster new re/investment, most have had at least some activity.

The following data for outcomes come from the latest reports annually prepared for the Department of Revenue (DOR) by county assessor’s offices, and they are subject to diligent follow-up and quality checking annually by OBDD, which receives copies of the reports. The data again show a program that has expanded substantially over the years in terms of business investment and employment.

In the 2022–23 tax year, these county reports showed 408 standard exemptions. These exemptions affected \$60.6 million in taxes extended (as directly reported by the counties). Another 84 exemptions of 3 to 5 years are expected to begin in 2024 on investments completed in 2023 and costing \$1.7 billion. For those exemptions ongoing in 2022–23, approximately \$5.6 billion in private investment was made by business from 2018 to 2022.

All told, these exemptions (including new ones in 2024) encompass 305 distinct projects by about 265 different business firms; both figures are smaller by 46 and 45 compared to two years ago. Sixty-eight percent of the companies were already operating inside the enterprise zone. The firms’ total number of employees working in full-time, year-round jobs totaled 34,913 in 2023 or by early 2024, of which 15,508 were jobs newly created with the exemption, as reported by the companies in claiming exemptions on DOR forms filed with the county assessor.

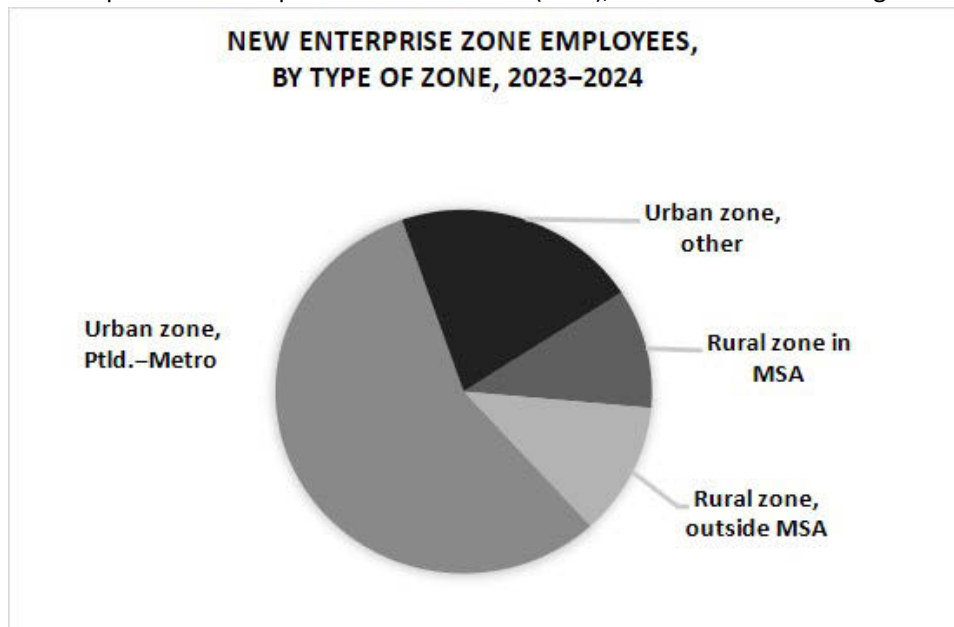
Dividing estimated property taxes abated over several years by those new direct jobs is about \$13,500 in property taxes per employee with some variation depending on the method used. This sort of measure can vary wildly by project, from less than \$100 per job to greater than \$100,000, skewing the average, such that property taxes per job would drop dramatically if excluding but a few of the most capital-intensive projects.

Consistent, straightforward employment criteria (which local governments can waive in certain situations) control a qualified business firm’s receipt of the standard enterprise zone exemption. The respective tax benefit depends simply on how much qualified property the business firm owns or leases at the time. This is how exempting property from taxation works, but the effect as an inducement can be rather blunt from a policy perspective. Given the nonlinear

nature of capital investment, it has long been the case that a handful of enterprise zone businesses (10 or less) overwhelmingly account for most exempt property and thus taxes forgone each year.

Undoubtedly, some enterprise zone investments would have been made even without this tax inducement, but they would tend to be among the many smaller projects comprising relatively little exempt property value overall. As investment size grows, the present-value benefit of avoiding taxes during a project's early years becomes increasingly significant for a firm's cash-flow analysis, not only in encouraging, attracting, and retaining sizeable capital investments and associated traded-sector jobs in Oregon, but also in terms of expediting or expanding the actual business operations. In addition, this program can militate private investment toward places with underutilized economic resources.

Most of program activity and job creation occur in the urbanized Portland region. The following chart distributes new jobs among zones in the METRO urban growth boundary, other urban enterprise zones, rural zones inside the 13 Oregon counties that are part of a metropolitan statistical area (MSA), and all other rural designations:



The *Property Tax Incentives Impact Study*, by Applied Economics (Business Oregon, Salem, February 2022) compiled data from the Oregon Employment Department on the change in payrolls related to business projects that were still actively using the expenditure during the 2019-21 biennium. The data were modeled to estimate indirect and induced employment effects in Oregon, and the overall return on investment (ROI) was found to be especially robust for this expenditure relative to estimated net property taxes lost while the projects were exempt, including the offset of In Lieu revenue. The study also addressed various quantitative and qualitative matters, including other local and state costs and benefits.

More immediately in terms of post-exemption properties, \$652 million in assessed value of formerly exempt property was added to the 2023 rolls, rendering additional taxes of \$18.3 million in the second half of the current biennium, for which Multnomah County does not report, and which does not include disqualified exemptions or special payments (see In Lieu above). Some of this added value would have occurred eventually, of course, possibly with a very different facility by another business, but not necessarily for a long time, as indicated anecdotally with the effect of newly designated enterprise zones on sites that had long gone undeveloped. Much of the once-exempt machinery and equipment is also not retired or removed for many years, or it may give rise to related/replacement investments that do not qualify for subsequent exemption.

Looking ahead—based on local applications for authorization copied by zone sponsors to OBDD by the beginning of July 2024—77 additional projects are proposed to begin exemptions in 2025 or later years, with a conservative number of 1,659 proposed new hires in addition to approximately 8,000 existing enterprise zone employees of the authorized business firms. These new projects would entail nearly \$6.7 billion of further investment, consisting mostly of high-technology or data-processing operations in the Hillsboro Enterprise Zone. This represents an extraordinary amount of

anticipated capital expense by enterprise zone businesses, which explains the much higher revenue impact projection for the 2025–27 biennium.

Enterprise zones are relatively common across Oregon; their benefits are the same throughout the state, and the zone typically covers all relevant land or sites for trade-sector development within a defined area. These characteristics allow a wide spectrum of traded-sector businesses to participate while adhering to uniformity and other strictures for taxation in the State Constitution.

This expenditure is also fiscally effective. Administration while highly decentralized is manageable, inexpensive, and minimizes the possibility of abuse. The short time frame of the exemption, three to five years, will tend to moderate revenue impacts. One alternative would be an income tax credit, but that could present greater challenges to administer and enforce, and any anticipated lack of immediate state income tax liability would substantially lessen its attractiveness to businesses. This type of expenditure also affords economic-administrative advantages and efficiencies compared to a directly funded grant to influence business development decisions about where and when to locate or expand.

Diverse enterprise zone programs are still found in most other states, many of which also offer high-impact, statewide incentives that Oregon does not. Oregon’s enterprise zone system continues to stand out for its rural basis, local control, and reliance on property tax relief.

Finally, on a broad, statewide level, Oregon enterprise zones are one of, if not the state’s premier tool for stimulating increased business investment across many traded-sector industries, including in competition with places outside of Oregon for retaining existing operations in Oregon. While many of the projects indicated above would also involve other local and state attributes, efforts, or programs, the standard exemption from property taxes is oftentimes the only significant inducement that the locality and Oregon can bring to bear.

2.014 LONG TERM RURAL ENTERPRISE ZONE (PROPERTY TAX)

Oregon Statute: 285C.409

Sunset Date: 06-30-2032 (local certification)

Year Enacted: 1997

2023-24 Estimated Reduction in the Taxable Assessed Value: \$12 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$356,000,000	\$28,000,000
2025-27	\$389,000,000	\$30,600,000

DESCRIPTION

The value of all new property and improvements at qualifying facilities in a rural enterprise zone can be exempt from property tax for 7 to 15 years as determined by an agreement between the business operating the facility and the local zone sponsor (city, port, or county). This new property can also be exempt while under construction for an unlimited number of years. To receive these exemptions, the business must also have approval by resolution of the city and county in which the proposed facility is located. Unlike business operations receiving a three- to five-year exemption under ORS 285C.175 (see [2.013, Enterprise Zone Businesses](#)), any type of business activity is eligible for this tax expenditure. Recent legislation HB 2009 (2023) extended the sunset date for the long-term rural enterprise zone program to June 30, 2032.

In addition to being in a rural enterprise zone at the time of the agreement, the facility also needs to be inside one of presently 25 eligible counties (currently containing 37 of Oregon’s 55 rural zones) that:

- Meets statutorily prescribed criteria for net out-migration or chronically low per capita income or high unemployment, or
- Is a qualified rural county (QRC), defined as a county outside a federal metropolitan statistical area (MSA) with a general countywide property tax rate of at least 1.3 percent.

The locally certified business must then meet specific requirements for minimum investment costs, new full-time hires, and average annual employee wages and compensation at the facility, as shown in the table below for facilities that begin their exemption in or after 2018. If a qualified business fails to meet those requirements, previously abated taxes must be repaid.

Minimum qualifications: Long-term rural enterprise zone facility	
Criteria	Minimums
Investment (\$) by end of year when operations begin (including existing, nonexempt property)	1% of total county real market value (RMV) up to \$25 million - or 0.5% of county RMV up to \$12.5 million if facility is 10 miles or more from Interstate 5 (I-5)
Full-time hires by business at facility	75 by end of 6th year - or if 10 miles or more from I-5: 50, 35 (if county population 40,000 or less), or 10 (if county population 10,000 or less or investment is greater than \$200 million) by end of 4th year
Average annual employee compensation (including benefits)	At least 150% (130% if in QRC) of county average annual wage by end of 6th year and thereafter maintain at that level
Average annual employee wage	At least 100% of county wage in every year after meeting compensation criterion

HB 2009 (2023) added a requirement that in the sixth and later years of the exemption period, the business pays a fee to the local school for the support of the statewide school system. The zone sponsor and school district must have previously established the rate for the fee between 15 and 30 percent of each year's total tax savings, as also applies to extended abatements of [2.013, Enterprise Zone Businesses](#).

A business locally certified before July 1, 2018 may also claim a corporate excise tax credit if formally allowed by the Governor. See [1.418, Long Term Rural Enterprise Zone Facilities \(Income Tax\)](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose for this expenditure. Presumably, it expands on the purpose of enterprise zones generally: "To stimulate and protect economic success ... throughout all regions of the state, but especially ... outside major metropolitan areas for which geography may act as an economic hindrance ... by providing tax incentives for employment, business, industry and commerce and by providing adequate levels of complementary assistance to community strategies for such interrelated goals as environmental protection, growth management and efficient infrastructure" (ORS 285C.055).

WHO BENEFITS

Businesses operating certain specially certified facilities in rural communities. As of 2024, a total of 17 facilities of 9 distinct companies were receiving a long-term rural enterprise zone facility (post-construction) exemption.

IN LIEU

The agreement between the business and the sponsor of the rural enterprise zone may include additional requirements requested by the sponsor, including but not limited to contributions for local services or public infrastructure benefiting the facility. Agreements typically have stipulated a schedule of other local payments during the exemption period, which benefit sponsoring governments and the local community.

EVALUATION

Provided by the Oregon Business Development Department

Besides two lumber manufacturers in Douglas and Klamath counties, this program currently consists of facilities that process either data or food, including massive, follow-on investments by Amazon, Apple, Facebook and Google in the counties of Crook, Morrow, Umatilla and Wasco, in which the original exemption for Google expired in 2022. Other certified facilities yet to begin a 7 to 15-year exemption include additional Amazon data centers in Morrow and Umatilla counties and two food-processing facilities in Deschutes and Morrow counties. The Big Beam/Fort George Brewery facility in Clatsop County demonstrates that new facility investments can be far from the massive amounts seen in other cases, in order for a business to utilize this program.

From 2021 to 2023, the exempt value with the 17 facilities receiving (in all but one case) 15-year property tax abatements under this expenditure grew from \$8.8 to \$12.8 billion. The exempt value of these facilities ranges from several million to a couple billion dollars. In 2023, the total property tax effect of the exemptions was \$187.5 million.

It is possible, and perhaps likely, that if Oregon did not have this program, these major investments in rural areas would not have happened there, and other prospective investors would not be looking so seriously at rural Oregon, which faces considerable economic challenges compared to metropolitan areas. In addition, they are rather extraordinary projects, for which there is strong probability that nowhere near that amount of taxable property would otherwise exist at those locations or elsewhere in the state. That Oregon offers other advantages for these investments—for example, cost of electricity, climate, and absence of any sales and use tax in the case of data centers—does not overturn that assessment. Businesses considering major investments will typically have comparably profitable options, such that property tax relief might still be indispensable for such rural development opportunities.

For purposes of the distribution of state revenue in association with the (former) state tax credit noted above, counties provide a limited report to Department of Revenue on the property taxes currently being forgone under this tax expenditure at the end of each calendar year. Program administration and compliance are entirely a local, *ad hoc* matter, with nothing by way of statutory provisions. The Oregon Business Development Department (OBDD), however, has created administrative tools to assist in monitoring hiring and other criteria by local entities

2.015 BROWNFIELD DEVELOPMENT

Oregon Law: Ore. Laws 2016 c.96 and 2019 c.492

Sunset Date: 01-01-2027

Year Enacted: 2016

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

NOTE: The revenue impact estimate includes the effect of the sunset

DESCRIPTION

This provision allows a local governing body of a city, county, or port to adopt an ordinance or resolution providing for a program that offers property tax incentives for any land that constitutes a brownfield located within the jurisdiction of the city, county, or port. The property tax program as specified in the local ordinance may contain either or both of the following:

- Special assessment of the brownfield land
- Exemption or partial exemption of improvements and personal property on the brownfield land

The following properties are not eligible for a local brownfield development property tax incentive program:

- Properties centrally assessed under ORS 308.505 to 308.681 by the Department of Revenue
- Industrial properties assessed by the Department of Revenue
- Superfund sites

The local ordinance does not become effective unless the taxing districts representing at least 75 percent of the property taxes within that location agree to the property tax incentive program.

Other elements of this program include:

- The owner of the property must obtain, as applicable, a site evaluation by a state registered geologist or professional engineer. If the evaluation shows that the site needs remedial action due to the presence of

hazardous substances, then such remediation must be conducted under a process authorized by the Department of Environmental Quality.

- The period for which the property tax incentive program benefits may be granted, not to exceed ten years, must be specified by the local ordinance. However, the ordinance may allow for an additional period, not to exceed five years.
- For ordinances that contain a provision for a special assessment, the special assessment is based on the real market value of the property if the property were not a brownfield minus the eligible costs required to clean up and contain the brownfield. Eligible costs include costs associated with site evaluations and remedial action, demolishing existing improvements as needed to complete remedial action, treating and disposing of hazardous waste and materials that contain hazardous waste, and constructing or modifying existing improvements to contain or abate hazardous substances. Eligible costs are reduced by government grants, tax credits, insurance proceeds or legal settlement funds received to offset remediation costs.
- For an ordinance that contains an exemption or partial exemption of improvements and personal property on a brownfield, the ordinance must state the percentage of the exemption to be applied to the real market value of the improvements and personal property.
- A local government may adopt other provisions, so long as they do not conflict with the statutory requirements.
- Property receiving a benefit under this program will continue to do so until the earlier of: the benefit period expiring, the date on which the dollar amount of the benefit equals the eligible costs for the property, or discovery that the owner of the brownfield failed to comply with the agreement. If the land is specially assessed, the owner must report annually the eligible costs incurred, for purposes of verification against the benefit limit.
- Upon disqualification, the taxes that would have been due for all prior years, if not for the benefit, are added to the next tax roll.

If a local governing body adopts both a special assessment and an exemption or partial exemption program, the two tax benefits must be granted concurrently for any property.

Applications are made to and approved by the local jurisdiction and may require an application fee. Property approved for the benefits may also be charged a fee by the county assessor. Legislation in 2016 (HB 4084) enacted this provision and scheduled it for repeal in 2027. The last day a local governing body can adopt an ordinance as specified by this provision is January 1, 2027. Despite such a repeal of the state law, property that has been granted a benefit under this provision will continue to receive the benefit for the specified term, provided that all other conditions are met. At any time, a local governing body may amend or repeal its program for property tax incentives related to brownfields. However, property that is receiving a benefit at the time the local program is amended or repealed will continue to receive the tax benefit under the conditions that were in place when the tax benefit was initially granted.

Originally, property was ineligible for this brownfield tax incentive if the property was granted any other special assessment, exemption, or partial exemption for the same tax year. Legislation in 2019 (HB 2699) enabled property benefiting from this brownfield tax incentive to be granted any other special assessment, exemption, or partial exemption for the same property tax year, provided that the total property tax liability of the property is not reduced below zero.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to allow the governing body of a city, state, or county, or port to provide a tax incentive program to encourage owners of brownfield land to take remedial action on the land, so that it is possible the land can be developed.

WHO BENEFITS

Owners of brownfield land who take remedial action on that land. In tax year 2023-24, counties reported three accounts that benefited from this exemption.

EVALUATION

Provided by the Department of Environmental Quality

DEQ recommends maintaining Oregon Laws 2016, Chapter 96 because it is a valuable tool for local governments to increase brownfield cleanups and redevelopment throughout Oregon. Implementation of brownfield tax incentives will contribute to creating a market for the brownfields properties, help in allowing for the cleanup and mitigation of these properties, and help to address the high costs of brownfield remediation that often hinder redevelopment opportunities throughout our communities in Oregon. Brownfield investigations and remediation costs (if necessary) create additional barriers to community based organizations, including those representing environmental justice communities. Cleanup and redevelopment of brownfields will result in reduced human health and environmental risk from exposure to contaminated sites, as well as provide public benefits including affordable housing, and community amenities such as parks, access to healthy food, and services not currently available. Brownfield cleanup and redevelopments also create job opportunities via cleanup implementation, site development, and site reuse.

Since Oregon Laws 2016, Chapter 96 was enacted in 2016, local governments have been considering how to implement this law in their jurisdictions. It takes communities some time to learn how to implement new legislation in their communities and draft legally sound ordinances/resolutions. In June 2018, Marion County became the first local government to implement Oregon Laws 2016, Chapter 96 by adopting Ordinance 1390.

The Oregon Brownfield Coalition fully supports Oregon Laws 2016, Chapter 96. The coalition is a group of more than 50 public, private, and nonprofit organizations dedicated to finding solutions to the statewide problem of brownfield contamination. Coalition members have expressed that the tax incentive authority is absolutely needed by local governments. The Oregon Brownfield Coalition has not convened since late 2020.

2.016 NEW INDUSTRIAL PROPERTY IN RURAL AREAS

Oregon Law: Ore. Laws 2016 c.112, 2018 c.111 §15, and 2019 c.575

Sunset Date: 01-01-2030

Year Enacted: 2016

2023-24 Estimated Reduction in the Taxable Assessed Value: \$3.7 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

This provision allows a governing body of a city or county to adopt an ordinance or resolution granting a limited-duration property tax exemption or tax deferral for industrial property located within the boundaries of that city or county. The local ordinance does not become effective unless the taxing districts representing at least 75 percent of the applicable property taxes agree to the property tax incentive program.

The following criteria must be met according to the local governing body's ordinance or resolution for the property to receive an exemption or tax deferral:

- The industrial property must be newly constructed or installed in a rural area, whether or not the location has formerly been used for industrial purposes. "Rural area" for the purpose of this provision is defined as an area located in unincorporated territory, or in a city with a population of less than 40,000, that is located entirely outside of urban growth boundaries of any city with a population of 40,000 or more.
- The property must be newly constructed or installed industrial property and must have a cost of initial investment of at least \$1 million and not more than \$25 million.
- The applicant must meet employment or other conditions per agreement with the city or county.

- Unless the city or county specifies otherwise, the exemption is granted at 100 percent of the real market value of the qualified property for any three out of five consecutive property tax years.
- The county or city may specify in the ordinance or resolution:

A minimum cost of initial investment greater than \$1 million,

- Number of years not greater than five for which exemption is granted,
- The percentage of real market value of the qualified property granted exemption each year, and
- Different schedules in each property tax year for the number of exempt years and percentage of real market value exempt, depending on the minimum cost of initial investment.

Instead of an exemption, a city or county may adopt an ordinance that defers the payment of tax that otherwise would be exempt as described above for qualified property. Interest does not accrue while the taxes are deferred. As with an exemption, the deferral cannot be granted for more than five tax years. The first year of deferred taxes are billed and due in the first tax year after the deferral ends. The second year of deferred taxes are billed and due in the second tax year after the deferral ends. This pattern continues for each deferred tax year, year by year, until all deferred taxes are billed.

At any time, a city or county may amend or terminate their ordinance for exemption or deferral on qualified industrial property. However, a property that is receiving an exemption or deferral at the time that the ordinance is amended or terminated will continue to receive the exemption or deferral that was in place when the exemption was initially granted.

Property cannot receive both this exemption or deferral and any other exemption or special assessment (excluding [2.011, Commercial Buildings Under Construction](#)).

If exempt property is not used in the manner or location for which it had been approved, or employment or other agreement terms are not met, the property may be disqualified from exemption and previously exempted tax would be charged on the next tax roll.

Legislation in 2018 (HB 2048) made some technical modifications to the definition of the “eligible location” for the industrial property to qualify for the property tax exemption. Legislation in 2019 (HB 2053) made a change to the due date for meeting employment requirements. Recent legislation in 2023 (HB 2080) extended the last day a local governing body can adopt an ordinance specified by this provision to January 1, 2030.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2080 (2023), “The policy purpose of this measure is to allow cities and counties the ability to provide temporary property tax relief to industrial owners newly constructing or installing qualified industrial improvements in rural area, thereby encouraging business investment in such property and contributing to overall economic development.”

WHO BENEFITS

Owners of industrial property in rural areas who construct or install new industrial property improvements.

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure might contribute to economic development in Oregon by offering rural city/county jurisdiction an alternative to enterprise zones (see [2.013, Enterprise Zone Businesses](#)) in a few cases, especially unincorporated areas with economic conditions that would not allow for zone designation. The department, nevertheless, lacks the data or direct experience to address it further, except to observe that the promulgation of the necessary ordinance, local district concurrence, and development of program apparatus at the local level necessitates a great deal of time and special efforts, as undertaken in Marion County, where this tax expenditure is currently being used.

2.017 INDUSTRY APPRENTICESHIP/TRAINING TRUST

Oregon Statute: 307.580

Sunset Date: None

Year Enacted: 1983

2023-24 Estimated Reduction in the Taxable Assessed Value: \$47 million

	Revenue Impact	
	Loss	Shift
2023-25	\$1,500,000	\$400,000
2025-27	\$1,600,000	\$400,000

DESCRIPTION

All real and personal property owned, held under contract of sale, or leased by an industry apprenticeship or training trust is exempt from property taxation if the industry apprenticeship or training trust meets all of the following conditions:

- The trust is organized only for assisting or implementing training programs according to ORS Chapter 660, Apprenticeship and Training
- The property is used exclusively and actively in training
- The trust is exempt from federal income taxes
- The trust does not discriminate based on age, race, religion, sex, or national origin.

The organization must file an application with the county assessor to claim the exemption. Industries and occupations likely to benefit from this exemption may include carpentry, electrical, masonry, plumbing, sheet metal, painting, mechanical, and machinist trades.

Legislation in 2023 (HB 2507) allowed the exemption to be kept if the property is used by a nonprofit corporation organized under section 501(c) of the Internal Revenue Code for a period of no more than seven consecutive days or a total on 30 cumulative days during any property tax year.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to provide equity between training trusts and other private schools. Trusts cannot qualify for an exemption under other statutes because they are not incorporated and are prevented from doing so by federal regulation. Many skilled labor occupations require an apprenticeship period to obtain a license in Oregon, and apprenticeship trusts provide training often unavailable at traditional schools.

WHO BENEFITS

The exemption lowers the cost of operation to the apprenticeship trusts. Seven counties reported 36 accounts for this exemption in tax year 2023-24.

EVALUATION

Not evaluated.

2.018 RURAL RENEWABLE ENERGY DEVELOPMENT ZONE

Oregon Statute: 285C.362

Sunset Date: None

Year Enacted: 2003

2023-24 Estimated Reduction in the Taxable Assessed Value: \$190 million

	Revenue Impact	
	Loss	Shift
2023-25	\$5,300,000	\$400,000
2025-27	\$10,700,000	\$900,000

DESCRIPTION

Qualified property is exempt from property tax in a Rural Renewable Energy Development (RRED) Zone if used for the generation of electricity from a “renewable energy resource” or for the manufacture, storage, or distribution of biodiesel, ethanol or similar fuels made from applicable inputs, subject to certain criteria. The exemption can last up to five years.

Counties, cities in rural counties, or a combination of contiguous rural counties can request the Oregon Business Development Department to designate them as a RRED Zone, encompassing all rural territory of the jurisdiction(s), which is defined as any area outside the urban growth boundary of cities with a population of 30,000 or more. From 2006 to mid-2024, 18 counties and one city have been designated as RRED Zones, and some have been re-designated either after terminating by operation of law or to refresh the \$250-million cap discussed below. Currently, there are 13 counties and the City of Pilot Rock designated as RRED Zones.

RRED Zones are indistinguishable from an enterprise zone in terms of the standard property tax exemption that it provides (see 2.013, [Enterprise Zone Businesses](#)), except that the zone sponsor (typically, the county government) may waive the requirement to increase employment for projects with investment costs of \$5 million or more. The geography, however, for a RRED Zone is quite different. The entire (rural) territory of the applicant zone sponsor is designated as a zone, which may be helpful in accommodating physically expansive developments, such as solar or wind farms. Biofuel projects could just as easily use an existing enterprise zone.

The overall amount of exempt property allowed over time within the zone is set by a local resolution with the zone’s designation, and by default, it cannot exceed \$250 million (increased from \$100 million in 2007) in terms of the real market value of property at the outset of the exemption period.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose for this expenditure. Presumably, it is to further renewable energy business development.

WHO BENEFITS

Firms involved in the production of biofuels or electricity from renewable energy resources in rural communities. In fiscal year 2023–24, four solar energy projects in Crook and Jefferson counties received this exemption.

EVALUATION

Provided by the Oregon Business Development Department

This expenditure has contributed to its purpose. Several businesses have placed projects into service, including biofuel production, community-size wind farms, geothermal power generation, and utility solar installations in rural areas, motivated in part, it seems, by this incentive. Current exempt projects employed at least a handful of people full time. (RRED Zone tax and other data are sometimes included as part of the annual county assessor reports required for standard enterprise zone exemptions, 2.013, [Enterprise Zone Businesses](#))

Wind farms were the originally intended use of this expenditure, but the huge increase during the mid- to late 2000s in their sheer size meant that they turned to a program more appropriate for such increasingly massive capital investments—see 2.100, [Strategic Investment Program](#). After 2010, the RRED Zone program saw a number of different types of projects, but use later subsided.

Subsequently, greater solar energy development arose and applied for authorization in the RRED Zones, but for a time, some of them and other solar farms instead used another tax expenditure—see 2.047, [Solar Projects](#). Then, for several years, solar developers found greater favor with RRED Zones, and interest for re /designations of such zones grew as a result (and because of possibilities with harnessing wave or tidal energy). Investments in utility scale solar energy were often approved in RRED zones using the \$5 million waiver noted above, absolving them of necessarily maintaining one or more employees inside the zone (typically the entire county). The relative attractiveness of 2.047, [Solar Projects](#) was more recently improved by 2021 legislation (SB 154).

Nevertheless, the RRED Zone statutes offer a clearer basis for counties to negotiate side issues with energy developers, including possibly additional ‘in lieu of like’ payments. This expenditure may also represent a better deal for other local taxing districts that depend more on property tax revenues.

2.019 HOUSING AUTHORITY RENTAL PROPERTIES

Oregon Statute: 307.092

Sunset Date: None

Year Enacted: 1937

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.2 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$39,100,000	\$9,400,000
2025-27	\$44,300,000	\$10,700,000

DESCRIPTION

Property that is owned or leased by housing authorities is considered to be public property and is exempt from all state and local taxes and special assessments. This exemption does not apply to commercial property of the housing authority which is leased to a taxable entity.

Property held in a partnership with private partners is also exempt so long as the housing authority is the general partner or manager of the property, and the property is used for housing low-income persons.

Housing authorities are public corporations at the city or county level created under ORS 456.055. They provide affordable housing services to low-income individuals and families.

PURPOSE

The exemption recognizes housing authority property as “public property used for essential public and governmental purposes” (ORS 307.092) and gives it the same exempt status as other public property. Presumably, the exemption also facilitates authorities providing lower rents to low-income renters.

WHO BENEFITS

In tax year 2023-24, approximately 1,312 property accounts in 24 counties around the state received this exemption.

IN LIEU

A housing authority can agree to make payments in lieu of tax payments for improvements, services, and facilities furnished by local governments, such as streets, lighting, water, and sewer.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose of supporting housing authorities. Based on research, this statute was required with the federal Housing Act of 1937 that created housing authorities. Since then, the exemption has proven to be a critical component of their ability to provide more units of housing and homes at more affordable rates to very low-income Oregonians.

The exemption achieves affordable rents in the following two ways. First, approximately 50 percent of housing authority tenants pay a rent of 30 percent of their income. That is the maximum they can pay under federal law in

public housing—that is, federally subsidized, housing authority owned housing. The balance of their rent is paid by the federal government through the housing authority. Tenant rent cannot be increased if the cost of their housing unit is increased. The benefit of the property tax exemption in these units is that the housing authorities can make more homes available to a larger number of tenants than if there were no exemption.

Second, approximately 50 percent of the tenants live in housing owned by housing authorities but not subsidized by the old federal public housing subsidies. Instead, this housing has been financed through a mix of commercial loans and “off market” financing sources including federal Low Income Housing Tax Credits, the Oregon Housing Fund, and the property tax exemption. In these housing developments, rent is not restricted to 30 percent of income. Even though the tenants are low income, their rents are directly related to construction and operating costs. The property tax exemption is a substantial part of making these units affordable to low-income households.

Many of the people who benefit from this expenditure are the most vulnerable in the local community. This exemption successfully achieves its purpose. The process for providing the exemption is very straightforward and easily administered; upon demonstration of a housing authority’s qualifying relationship to a given piece of property, the exemption is granted. It is unlikely that local jurisdictions would prefer to collect taxes and use them in a direct spending program to achieve the low-income housing development that this exemption makes possible. The exemption is also the most fiscally effective means of achieving its purpose.

2.020 LOCAL GOVERNMENT OWNED LOW-INCOME HOUSING

Oregon Statute: 307.110(3)(h)

Sunset Date: None

Year Enacted: 2013

2023-24 Estimated Reduction in the Taxable Assessed Value: \$130 million

	Revenue Impact	
	Loss	Shift
2023-25	\$3,900,000	\$700,000
2025-27	\$4,300,000	\$800,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, property of any county or city, town or other municipal corporation or political subdivision of Oregon that is used for affordable housing or is leased or rented to persons of lower income is exempt from property taxation. A person of lower income is a person whose income is not greater than 80 percent of the area median income, adjusted for family size, as determined by the Oregon Housing and Community Services Department using United States Department of Housing and Urban Development information.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 3112 (2013), the purpose of this provision “...is to provide cities and local governments with the ability to acquire property to build and maintain adequate low-income housing.”

WHO BENEFITS

In 2023-24, counties reported that there were 65 accounts receiving this exemption across two counties.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. By allowing city and county affordable housing projects to be exempt from property taxation, the operating costs of the project are reduced. While not all cities and counties have the organizational and budget capacity to own and operate affordable housing, for those that do have the capacity, this reduction to operating costs serves as an incentive to acquire, build, and maintain affordable housing rental resources for low-income households.

2.021 FEDERAL LAND UNDER SUMMER HOMES

Oregon Statute: 307.183 to 307.184

Sunset Date: None

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

Revenue Impact		
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, the land under summer homes that is owned by the Forest Service or Bureau of Land Management and used by permit or lease is exempt from property tax. The summer home, other buildings or structures, and improvements to the land (water or septic systems, electric service, and landscaping) are all taxable to the lessee.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to avoid the administrative difficulty of valuing federal property that has restrictions on land use.

WHO BENEFITS

Owners of summer homes on federal land with special use permits for residential purposes.

EVALUATION

Not evaluated.

2.022 FEDERAL LAND UNDER RECREATION FACILITY

Oregon Statute: 307.182

Sunset Date: 06-30-2030

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: \$5.3 million

Revenue Impact		
	Loss	Shift
2023-25	\$100,000	Less than \$100,000
2025-27	\$100,000	Less than \$100,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. This provision ensures that federal government land remains exempt from property tax when occupied and used by a commercial recreation facilities operator under a permit. Examples are ski resorts and lake marinas on federal land. Only the land is exempt. All real and personal property improvements are taxable to the taxpayer having possession of the property.

This exemption applies only to recreation facility land held under permit. Some recreation facility land is held only by lease and is thus taxable.

This property tax exemption was allowed to sunset on June 30, 2012; however, legislation in 2013 (SB 549) reinstated this exemption retroactive to tax year 2012–13 and set a sunset date of June 30, 2024. Recent legislation in 2023 (HB 2080) extended the sunset date to June 30, 2030.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2080 (2023), the purpose of this credit is “to acknowledge the fees paid by permit holders to the Forest Service, 25 percent of which is returned to counties. It is also to avoid the administrative difficulty of valuing federal land with restrictions on land use.”

WHO BENEFITS

Operators of recreational facilities that operate under permit on federal land benefit from this exemption.

IN LIEU

Recreational facilities pay for permits to use the land. Twenty-five percent of the fees paid to the Forest Service are shared with counties.

EVALUATION

Provided by the Oregon Business Development Department

This expenditure achieves its purpose. Recreation areas that benefit from this legislation are on Forest Service land via a Special Use Permit. This permit, while long term, is very restrictive and not at all like a typical, private landlord–tenant arrangement. These restrictions make it very difficult to establish a value on the property. In addition, removal of the property tax exemption for recreation facilities on federal lands would subject these areas to some level of double taxation unless other adjustments were also made. Moreover, exceptional legal complexities might attend efforts to assess taxes on land effectively still under federal ownership and control. Finally, this tax expenditure would help sustain and control costs at recreational opportunities, including as attractions for spending by out of state tourists that could benefit the state as well as local economies.

2.023 NONPROFIT ELDERLY HOUSING STATE FUNDED

Oregon Statute: 307.242

Sunset Date: None

Year Enacted: 1977

2023-24 Estimated Reduction in the Taxable Assessed Value: \$110 million

	Revenue Impact	
	Loss	Shift
2023-25	\$3,400,000	\$800,000
2025-27	\$3,600,000	\$900,000

DESCRIPTION

Group homes for the elderly built or acquired after January 1, 1977 by private nonprofit corporations (defined in ORS 307.375) that receive subsidies under certain federal and state housing programs are exempt from property taxation. Only the land and improvement value, not personal property, may be exempted. The corporation may not charge more than one month’s rent as a “move in” fee or deposit, and rents must reflect the property tax savings. The occupants do not qualify for the veteran’s exemption or homestead tax relief. If the corporation receives a state subsidy, any property added after January 1, 1990 is not eligible for exemption.

PURPOSE

To “assist private nonprofit corporations to provide permanent housing, recreational and social facilities, and care to elderly persons” (ORS 307.241).

WHO BENEFITS

Residents of exempted homes who pay lower rent as a result of the home not paying property tax. In tax year 2023-24, 13 counties had 43 homes receiving this exemption.

IN LIEU

An annual claim must be filed with the county assessor to receive the exemption. If approved, an amount equal to what the exempt taxes would have been is billed to the Department of Revenue instead of the property owner. Funds to pay these amounts are appropriated by the legislature from the General Fund. If the General Fund appropriation is not sufficient to pay the liabilities in full, then all of the amounts paid are prorated to no more than the appropriation amount. In the event that this proration is necessary, it will result in a revenue loss to the taxing districts. For 2023-24, proration was needed, and the payments made by the state totaled approximately \$1.82 million, about \$241 thousand less than the total tax liability of \$2.061 million.

EVALUATION

Provided by the Oregon Housing and Community Services Department

Generally, this expenditure appears to achieve its purpose. The effect of the state funded tax relief is to reduce housing project operating expenses, thereby reducing the rents to project occupants. Tenants otherwise would have to support the property taxes through the monthly rent they pay. The average monthly rent reduction is about \$40 per unit. For seniors on fixed incomes, any rent reduction can be significant.

Because eligible project sponsorship or ownership is limited to nonprofit corporations, it is assumed the full benefit of the tax relief is passed on to the project tenants. As OHCS does not income verify residents, it is also assumed that the elderly households that reside in eligible housing projects have limited incomes that warrant the benefit of this rent reduction.

The current annual application process is very time consuming and involves a minimum of six separate steps each year. The administrative steps for county government include: 1) mail applications to each qualifying nonprofit, 2) verify information received from each applicant, 3) provide a copy of the information to the Department of Revenue, 4) notify applicant of approval/denial, 5) send tax statements and certification letter to the Department of Revenue for payment, and 6) notify applicant that the taxes have been paid. An alternative to the annual application could be a statement of compliance from the qualifying nonprofit if verification is required.

An alternate means to provide an equal benefit to the project residents would be a rent subsidy program. However, administration of a rent subsidy program would be more administratively burdensome than the existing subsidy.

A direct property tax exemption may be a more efficient means to provide a like benefit to the project tenants. However, local taxing districts (such as cities and schools) would not receive compensating income if a direct property tax exemption were implemented in lieu of the tax relief program. This revenue loss would be relatively small when considered in the context of the overall scope of exemptions and special assessments. However, property taxes are direct expenses that affect the operating costs of rental housing. Without this exemption, seniors would likely experience corresponding increases in rent payments.

2.024 INVENTORY

Oregon Statute: 307.400

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: \$29 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$925,000,000	\$222,000,000
2025-27	\$981,000,000	\$235,000,000

DESCRIPTION

Inventory is exempt from property taxation. In general, inventory is tangible personal property that is or will become part of the stock held for sale in the ordinary course of a taxpayer's business. This includes materials, supplies, containers, goods in process, finished goods, and "for sale" inventory, but not machinery and equipment used to

produce these goods. The revenue impact of this tax expenditure includes the revenue impact of 2.028, [Ship Repair Facility Materials](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to eliminate the tax compliance burden of enumerating inventory and to eliminate behavior specifically aimed at reducing inventories on the date of assessment.

WHO BENEFITS

Manufacturing, wholesale, and retail trade businesses are the primary beneficiaries of this exemption.

EVALUATION

Not evaluated.

2.025 BUSINESS PERSONAL PROPERTY AND RESIDENTIAL FLOATING STRUCTURES

Oregon Statute: 308.250(2)(a)

Sunset Date: None

Year Enacted: 1979

2023-24 Estimated Reduction in the Taxable Assessed Value: \$390 million

	Revenue Impact	
	Loss	Shift
2023-25	\$10,500,000	\$2,000,000
2025-27	\$11,400,000	\$2,100,000

DESCRIPTION

Business personal property required to be reported under ORS 308.290 and existing, unmodified residential floating structures are exempt from property tax if the total assessed value of such personal property of a taxpayer in a year is less than the specified maximum. The maximum threshold is \$22,500 for the tax year beginning July 1, 2024. It is indexed annually to inflation.

To receive an exemption from property tax for business personal property where one did not exist in the previous tax year, the taxpayer must file a business personal property return with the county assessor. After receiving an initial exemption of property tax on this property, in order to maintain the exemption for future years, the taxpayer may file an annual statement declaring that the value continues to be less than the threshold. If the taxpayer has added or deleted personal property since the prior assessment year, the taxpayer is required to submit to the county assessor a signed business personal property return with an updated asset detail list on or before March 15. Business personal property can include items such as office furniture, industrial machinery, commercial floating structures, and equipment.

In 2017, the Legislature (HB 2573) changed this expenditure from a cancellation of property tax to an exemption from taxation. In 2022, the Legislature (SB 1559) added residential floating structures to the statute exempting business personal property below the threshold.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce filing burdens for small businesses and owners of residential floating structures, as well as to reduce administrative costs related to the processing and collections of small business personal property or residential floating structure tax accounts.

WHO BENEFITS

Counties reported that approximately 70,000 property tax accounts benefited in tax year 2023-24.

EVALUATION

Not evaluated.

2.026 CARGO CONTAINERS

Oregon Statute: 307.835

Sunset Date: 06-30-2026

Year Enacted: 1979

2023-24 Estimated Reduction in the Taxable Assessed Value: \$5.3 million

Revenue Impact		
	Loss	Shift
2023-25	\$200,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

All cargo containers principally used for the transportation of cargo by vessels in trade and ocean commerce are exempt from property tax. Cargo containers must be designed for carriage of goods by vessels, be strong enough for repeated use, and be fitted with handling devices. In 2019 (HB 2130), the Legislature extended the sunset date to June 30, 2026.

This statutory exemption applies to containers owned by both domestic and foreign (international) companies. However, the containers owned by foreign companies would be exempt even in the absence of this statute based upon interpretation of commerce law in the U.S. Constitution, as clarified under the rulings of the following court cases: *Japan Line Ltd., v. County of Los Angeles*, 441 US 434 (1979) and *Itel Containers International Corp. v. Huddleston, Comm’r of Revenue of Tennessee*, 507 US 60 (1993) (explaining the scope of the holding in *Japan Line*).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2130 (2019), “the policy purpose is to assist Oregon shipping companies in competing in a global market.”

WHO BENEFITS

Owners of ocean-going cargo containers. The Port of Portland reported handling 116,063 containers associated with ocean-going vessels at its marine terminals in 2023.

EVALUATION

Provided by the Oregon Business Development Department

The Port of Portland and Oregon’s shipping interests face a very competitive environment among West Coast ports in their efforts to reestablish container shipping services for Oregon businesses. Because of that, both the Port and the Columbia River Steamship Operators Association have traditionally supported retention of the cargo container exemption in the interest of regaining and maintaining the state’s access to international container shipping service. The exemption also benefits agricultural shippers and others seeking to move containerized cargo through the upriver ports of Morrow and Umatilla to Terminal 6 at the Port of Portland, as well as the Oregon International Port of Coos Bay in the future as it is developing a multimodal container facility. Besides helping maintain competitive access to international container shipping service that is important to many Oregon industries, this property tax expenditure is also intended to moderate shipping costs for those industries.

2.027 LEASED DOCKS AND AIRPORTS

Oregon Statute: 307.120

Sunset Date: None

Year Enacted: 1947

2023-24 Estimated Reduction in the Taxable Assessed Value: \$410 million

	Revenue Impact	
	Loss	Shift
2023-25	\$12,800,000	\$3,600,000
2025-27	\$13,900,000	\$3,800,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. This tax expenditure provides exceptions to this rule as it relates to leased dock and airport property.

Public dock property is exempt from property tax if it is leased, subleased, rented, or preferentially assigned and used for:

- Berthing ships or barges
- Handling, loading, and unloading cargo from ships
- Cleaning or decontaminating agricultural cargo, if the property does not further alter or process an agricultural commodity.

By December 31 preceding a year in which the property is leased, or within 30 days of entering into the lease, whichever is later, the private lessee must file a request for the county assessor to compute a required in-lieu payment.

The requirements above do not apply to property held under lease or rental agreement executed for any purpose prior to July 5, 1947, which is exempt and does not require the in-lieu payment. In this case, the exemption continues only during the term of the lease or rental agreement in effect on July 5, 1947.

For a city-owned airport or port district serving a population of fewer than 300,000, airport property that is leased and used by private individuals remains exempt if the rent proceeds are used for airport operations and maintenance. An in-lieu payment is not required.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to support the operation of docks and small airports, regardless of the type of entity operating them.

WHO BENEFITS

Entities leasing eligible dock or airport properties. In tax year 2023–24, there were approximately 350 exempt properties in eleven counties.

IN LIEU

For qualifying dock properties, an in-lieu payment of one-quarter of one percent of real market value is assessed annually and distributed to school districts. Airport properties are not subject to the in-lieu requirement.

EVALUATION

Provided by the Oregon Business Development Department

Besides reducing revenue available for other public service, this exemption shifts a portion of the local property tax burden from owners and users of dock and airport property to owners of other properties. Increased economic activity due to this exemption may compensate for these tax effects by increasing other local and state tax collections, in addition to public benefits arising from the upkeep and use of port infrastructure and of local airports in smaller communities. Public ports, which support retaining this exemption, use it in various ways across Oregon, including as

an essential way to generate revenue to maintain properties and attract tenants at their airport facilities, as well as working productively with dock operators or cargo handlers for maritime shipping.

2.028 SHIP REPAIR FACILITY MATERIALS

Oregon Statute: 308.256(7)

Sunset Date: None

Year Enacted: 1957

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.024, Inventory](#)

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.024	Included in 2.024
2025-27	Included in 2.024	Included in 2.024

DESCRIPTION

Materials and parts held by shipyards and ship repair facilities as of January 1 are exempt from property tax if, by April 1, the parts and materials are physically attached to or part of watercraft undergoing major remodeling, renovation, conversion, or repair. The parts and materials are initially assessed, but assessors must cancel the assessment if documentary proof of qualification for exemption is provided before April 1.

The value of watercraft under construction or undergoing major remodeling is also exempt, as described in tax expenditure [2.139, Watercraft Locally Assessed](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to help Oregon shipyards compete with shipyards in other states.

WHO BENEFITS

This exemption predates tax expenditure [2.024, Inventory](#). Most—if not all—of the material exempted by this statute would likely be considered inventory.

EVALUATION

Not evaluated.

2.029 RAILROAD CARS BEING REPAIRED

Oregon Statute: 308.665

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: \$30 million

Revenue Impact		
	Loss	Shift
2023-25	\$900,000	\$200,000
2025-27	\$1,000,000	\$200,000

DESCRIPTION

Railroad cars owned by private companies and undergoing major work are exempt from property taxation. Major work includes remodeling, renovation, conversion, or repairs, if the total labor exceeds 10 hours. A railroad car is exempt starting from the time it awaits transportation to a repair facility and ending with the time it has returned from a repair facility. Documentation proving qualification for the exemption must be furnished to the Department of Revenue.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing transportation equipment that is temporarily unable to be used for its intended purpose.

WHO BENEFITS

Approximately 80 companies benefited from this exemption in tax year 2023–24.

EVALUATION

Not evaluated.

2.030 LOW-INCOME HOUSING OWNED BY RELIGIOUS ORGANIZATION

Oregon Statute: 307.140(4)

Sunset Date: None

Year Enacted: 2021

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in 2.087, Religious Organizations

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.087	Included in 2.087
2025-27	Included in 2.087	Included in 2.087

DESCRIPTION

Land and buildings on the land owned by a religious organization and held or used solely to provide affordable housing to low-income individuals is exempt from taxation. Legislation explicitly excluded this exemption from the automatic six-year sunset under ORS 315.037.

PURPOSE

The law that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2008 (2021), the purpose of this provision is “to increase the supply of affordable housing in the state.”

WHO BENEFITS

Religious organizations who own land that is rented by low-income individuals, and those low-income individuals.

EVALUATION

Provided by the Oregon Housing and Community Services Department

To increase the supply of affordable housing for Oregonians we need the participation of as many sectors as possible, including the faith-based and religious organizations. Allowing the tax exemption on the land and buildings for low-income housing purpose will reduce the operating expenses as well as keeping the rents low for tenants.

2.031 NEW ADU OR NEWLY CONVERTED MULTIPLEX

Oregon Law: Ore. Laws 2023 c.583

Sunset Date: None

Year Enacted: 2023 (SB 919)

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

Revenue Impact		
	Loss	Shift
2023-25	\$200,000	Less than \$100,000
2025-27	\$400,000	Less than \$100,000

DESCRIPTION

A city or county may grant a property tax exemption for up to 5 years for a newly constructed accessory dwelling unit (ADU), or a newly converted duplex, triplex, or quadplex that is occupied as a primary residence. A newly constructed ADU must be occupied as a primary residence to be exempt. The main dwelling unit does not need to be occupied as a primary residence because it is not eligible for exemption. If any exempt unit is no longer occupied as a primary residence, the entire property becomes ineligible for exemption. Legislation explicitly excluded this exemption from the automatic six-year sunset under ORS 315.037.

For a property to receive the exemption, the owner must file an application and local taxing districts representing at least 51 percent of the taxes on the property must agree to the exemption, after which the exemption applies to the taxes of all districts. To continue receiving the exemption each year after receiving initial approval, the owner must file a new application.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 919 (2023), "the purpose of the exemption is to expand housing supply, utilizing existing residential land and infrastructure."

WHO BENEFITS

Owners of a newly constructed accessory dwelling unit, or a newly converted duplex, triplex, or quadplex who occupy it as a primary residence.

EVALUATION

Provided by the Oregon Housing and Community Services Department

Due to the recent approval of this tax exemption, OHCS has not yet had an opportunity to evaluate the use or usefulness of this opportunity.

2.032 FOOD PROCESSING EQUIPMENT

Oregon Statute: 307.455

Sunset Date: 06-30-2030

Year Enacted: 2005

2023-24 Estimated Reduction in the Taxable Assessed Value: \$330 million

	Revenue Impact	
	Loss	Shift
2023-25	\$13,600,000	\$3,000,000
2025-27	\$18,500,000	\$4,100,000

DESCRIPTION

Upon application, qualified real or personal property machinery and equipment that is newly acquired by a food processing business is exempt from property taxation for five years. The machinery or equipment may be new or used, as long as it is newly acquired by the food processor. Food processing businesses are those that freeze, can, dehydrate, concentrate, preserve, process, or repack fruit, vegetables, nuts, legumes, or seafood in any procedure that generally occurs before the first sale by the processor. Producers of alcoholic beverages are ineligible.

Legislation in 2015 (HB 3125) expanded the exemption to include machinery and equipment used to process grains, bakery products, dairy products, and eggs, and prohibited anyone engaged in the business of producing marijuana or any product containing marijuana or a marijuana extract from qualifying for the exemption. The legislation also required qualified machinery and equipment used to process grains and bakery products to have real market value of at least \$100,000 when placed in service. However, the 2016 Legislature modified this provision to require the total cost of initial equipment investment by the food processor to be at least \$100,000 to qualify for the exemption.

Qualified machinery is certified by the Oregon Department of Agriculture. Machinery and equipment is exempt for five years following certification.

Legislation in 2019 (HB 2164) allows a city or county to adopt a lower exemption amount or opt out of the exemption. Legislation in 2023 (HB 2080) included meat and wild game processing under this exemption. HB 2080 also extended the sunset date from June 30, 2025 to June 30, 2030; any equipment that has already received the exemption by that date will continue to receive the exemption for the full five years.

PURPOSE

“The Legislative Assembly declares that a property tax exemption for qualified real property machinery and equipment encourages continued operation and expansion of the food processing industry in this state” (ORS 307.453).

WHO BENEFITS

Food processors that acquire machinery and equipment.

EVALUATION

Provided by the Oregon Department of Agriculture

Not only must Oregon’s food and beverage processors be competitive with their national competitors, they must also be competitive in the global marketplace. Opportunities to make capital investments that provide gains in efficiencies and expand product lines is one strategy for businesses to remain competitive.

This tax exemption encourages food-processing companies to replace aging equipment with more efficient and modern equipment. The exemption also supports food processors make the needed investments for new product lines. Investments made by local businesses are an investment in local jobs and healthy communities. Because processors try to be located near the source of their ingredients (ex. Oregon agricultural commodities), these capital investments also positively support rural communities.

The exemption also allows for Oregon to be more competitive when recruiting food processors for direct investment. The exemption also encourages opportunities for agricultural producers to invest and create value-added products. These both aid rural and urban economic development.

This exemption is narrowly targeted, and serves its purpose of creating investment, retaining and expanding jobs, and creating additional markets for Oregon growers. There has been interest in expansion of this credit to include other commodities and food products.

2.033 FARM MACHINERY AND EQUIPMENT

Oregon Statute: 307.394

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: \$4.7 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$109,000,000	\$19,200,000
2025-27	\$115,000,000	\$20,400,000

DESCRIPTION

Machinery and equipment classified as personal property or real property and used in farm operations involving crops, livestock, poultry, fur bearing animals, bees, dairying, animal husbandry, or other agricultural or horticultural products are exempt from property tax.

Added by HB 2904 (2009), machinery and equipment used primarily to implement a plan certified by an agent of the Oregon State University Extension Service to remediate or mitigate severe adverse conditions on farmland is exempt while the plan is in process.

The revenue impacts of the following tax expenditures are included here:

- [2.034, Mobile Field Incinerators](#)

- [2.041, Center Pivot Irrigation Equipment](#)
- [2.042, Other Farm/Aquaculture/Egg Equipment](#)
- [2.043, Field Burning Smoke Management Equipment](#)

Legislation in 2024 (HB 4111) expanded the exemption to include machinery and equipment classified as real property beginning tax years starting on or after July 1, 2025. Before this legislation, only machinery and equipment classified as personal property, held for use in qualifying farm operations was eligible for this exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of farming by reducing the operational costs associated with purchasing and maintaining essential farm machinery and equipment, and ease tax administration.

WHO BENEFITS

Farmers and agricultural producers who own and use qualifying machinery and equipment benefit directly from this exemption. By reducing the property tax burden, the exemption helps farmers manage their operational costs more effectively, which may be particularly beneficial for small and beginning farmers.

EVALUATION

Provided by the Oregon Department of Agriculture

This expenditure assists agriculture producers in modernizing machinery and equipment classified as personal property. Agricultural machinery and equipment are extremely expensive, and farmers spend more on machinery per worker than any other industry. Agricultural producers do not set prices and as commodity prices fluctuate dramatically tax planning and cost recovery is limited. This tax exemption assists small and beginning producers by reducing the compounding operational costs on critical machinery and equipment. Reducing tax liability allows agricultural producers who benefit to adopt new technologies and increase efficiencies.

The current tax exemption appears a more appropriate treatment of this particular situation than direct spending.

2.034 MOBILE FIELD INCINERATORS

Oregon Statute: 307.390

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.033, Farm Machinery and Equipment](#)

	Revenue Impact	
	Loss	Shift
2023-25	Included in 2.033	Included in 2.033
2025-27	Included in 2.033	Included in 2.033

DESCRIPTION

Mobile field incinerators owned by farmers and used exclusively for sanitizing grass seed fields by means other than open field burning are exempt from property tax. Incinerators must be purchased within five years after they are certified by the Department of Environmental Quality. If these incinerators are used at the field site in preparing the soil for farm purposes, these would be exempted under tax expenditure [2.033, Farm Machinery and Equipment](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage pollution control by the use of mobile field incinerators in place of open field burning of grass straw.

WHO BENEFITS

Farmers with mobile field incinerators would receive the benefit. However, these incinerators are not commonly used.

EVALUATION

Provided by the Oregon Department of Agriculture

This expenditure is not achieving the purpose for which it was intended. The current technology of mobile field incinerators is too expensive to be viable and farmers have adopted other means to sanitize grass seed fields. Barring a major technological advance that reduces its cost, the use of mobile field incinerators is not likely to become a viable technology for farmers.

2.035 CROPS, PLANTS, AND FRUIT TREES

Oregon Statute: 307.320

Sunset Date: None

Year Enacted: 1957

2023-24 Estimated Reduction in the Taxable Assessed Value: \$710 million

Revenue Impact		
	Loss	Shift
2023-25	\$16,600,000	\$2,900,000
2025-27	\$18,100,000	\$3,200,000

DESCRIPTION

Deciduous trees, shrubs, plants, crops, cultured Christmas trees, and cultivated hardwood trees growing on agricultural land are exempt from local property taxation. When crops and plants are harvested and unsold as of the assessment date, they are treated as inventory subject to the exemption described in tax expenditure [2.024, Inventory](#). Agricultural products held for use in farming operations are exempt as described in tax expenditure [2.036, Agricultural Products Held by the Farmer](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purposes are to improve the financial viability of agriculture by reducing the property tax burden and to ease administration by eliminating the filing of personal property tax returns for farmers.

WHO BENEFITS

Owners of deciduous trees, shrubs, plants, crops, cultured Christmas trees, and cultivated hardwood trees growing on agricultural land. Oregon has about three and half million acres of harvested agricultural land.

EVALUATION

Provided by the Oregon Department of Agriculture

This exemption is accomplishing its purpose. This exemption helps maintain the financial viability of farming operations by excluding these assets from property taxation while they are still in the growing phase, allowing farmers to focus resources on production rather than on tax liabilities. This support may be particularly valuable in mitigating the financial impacts of unpredictable factors such as weather conditions and market fluctuations, which can significantly affect agricultural income.

It is our view that this expenditure is the most fiscally effective means of achieving its purpose, also placing this inventory on par with the exemption of inventory tax on all businesses in Oregon.

2.036 AGRICULTURAL PRODUCTS HELD BY THE FARMER

Oregon Statute: 307.325

Sunset Date: None

Year Enacted: 1965

2023-24 Estimated Reduction in the Taxable Assessed Value: \$5.0 million

Revenue Impact		
	Loss	Shift
2023-25	\$100,000	Less than \$100,000
2025-27	\$100,000	Less than \$100,000

DESCRIPTION

Agricultural products in the possession of the farmer who produced them or acquired them for consumption or use in the farm operation are exempt from property tax. These products are grain, seed, hay, fruit, vegetables, nuts, hops, wool, fish, livestock, fur bearing animals, bees, poultry, butter, cheese, milk (evaporated, condensed or concentrated), mint, bivalve mollusks, and vermiculture supplies and products.

Most products held by farmers are considered inventories because they are being held for ultimate sale and are exempt under tax expenditure 2.024, [Inventory](#). This provision exempts those products not covered by the inventory exemption if they are held for use on the farm rather than for ultimate sale.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to eliminate the burden of enumerating livestock and crop inventories and to improve the financial viability of farming.

WHO BENEFITS

Most of the exempt value for this expenditure is for cattle and calves used in farm operations. It also benefits other farmers who hold products for their own use, such as those who raise hay and other feed for their own animals.

EVALUATION

Not evaluated.

2.037 NURSERY STOCK

Oregon Statute: 307.315

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: \$200 million

Revenue Impact		
	Loss	Shift
2023-25	\$4,700,000	\$800,000
2025-27	\$5,100,000	\$900,000

DESCRIPTION

This exemption applies to nursery stock held by growers or wholesalers, and exempts them from local property taxation. Nursery stock includes plants, trees, and shrubs that are either bare-root, balled, in containers, or in the ground, and are grown or kept for propagation or sale.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of the nursery industry by reducing the property tax burden.

WHO BENEFITS

Most nursery stock is grown in Western Oregon, concentrated in the Willamette Valley.

EVALUATION

Provided by the Oregon Department of Agriculture

This tax expenditure is accomplishing its purpose. The exemption of nursery stock is consistent with the exemption provided for other farm commodities described in tax expenditure 2.035, [Crops, Plants, and Fruit Trees](#), and with the exemption of inventories in nonagricultural industries described in tax expenditure 2.024, [Inventory](#). This exemption helps ensure that nursery businesses can remain competitive by allowing them to allocate more resources toward production, innovation, and market expansion rather than tax liabilities. Given that Oregon’s nursery industry is a major player in both national and international markets, maintaining this exemption is likely important for sustaining its growth and competitiveness.

Any change, such as the elimination of this exemption, resulting in an increase in market price would reduce the competitiveness of Oregon-grown nursery stock in the national and international marketplaces. The current tax expenditure is the most effective means of achieving this purpose and places this inventory on par with all other business inventory in Oregon as tax exempt.

2.038 LEASED STATE AND LOCAL FARMING AND GRAZING LAND

Oregon Statute: 307.110(3)(b)

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in 2.078, [State and Local Property](#)

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.078	Included in 2.078
2025-27	Included in 2.078	Included in 2.078

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, land owned by the state or a local government that is leased or rented for agricultural or grazing use by persons who do not pay rent in cash or as a share of the crop is exempt from property taxes. In some cases, the lessee performs a service in return for farming or grazing rights. For example, a farmer might use public land for agricultural purposes, and in return, agree to keep other state or locally owned land mowed.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to provide property tax relief to farmers and livestock owners, and to avoid the administrative difficulty of valuing these state and local government properties that have restrictions on land use.

WHO BENEFITS

Farmers and ranchers who lease state and local land. The expenditure also benefits state and local governments, who in exchange receive land maintenance, which may be more valuable than the potential rent due to management costs associated with small, isolated parcels.

EVALUATION

Provided by the Oregon Department of Agriculture

This expenditure effectively achieves its purpose. It produces benefits to local communities through the increased economic activities associated with the livestock industry. The increased economic activities provide additional tax resources for Eastern Oregon counties, and the state or local government is provided a service of land management, weed control, reduced fire danger or other value in exchange for pasture feed.

Without this expenditure, it is likely that costs to governments would exceed benefits due to the substantial expenses needed to administer the lands in comparison to the returns to the state.

2.039 LEASED FEDERAL GRAZING LAND

Oregon Statute: 307.060

Sunset Date: None

Year Enacted: 1961

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in 2.093, Federal Property

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.093	Included in 2.093
2025-27	Included in 2.093	Included in 2.093

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, federal land leased primarily for agricultural purposes from a federal wildlife conservation agency or used primarily for livestock grazing is exempt from local property taxation.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purposes are to improve the financial viability of agriculture by reducing the property tax burden and to avoid the administrative difficulty of valuing federal property that has restrictions on land use.

WHO BENEFITS

Farmers and ranchers who lease federal land for grazing.

IN LIEU

The Bureau of Land Management and the Forest Service establish grazing fees based on animal unit months (AUM) rather than acres. An animal unit month is defined as the amount of forage needed to sustain one cow for one month. Part of the fee income paid to the federal government is shared with local governments.

EVALUATION

Provided by the Oregon Department of Agriculture

The treatment of federal land under this exemption is consistent with the treatment of state and local land (2.039). Further, federal lands are not subject to property taxation by local jurisdiction regardless of use.

2.040 SHELLFISH GROWING ON STATE LAND

Oregon Statute: 622.290

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: \$3.5 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, state land being used for the private cultivation of oysters, clams, and mussels under permit from the Department of Agriculture is exempt from local property taxation. Annual cultivation fees and use taxes are paid in lieu of property taxes and lease fees.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage shellfish production and to avoid the administrative difficulty of valuing state property that has restrictions on land use.

WHO BENEFITS

Shellfish growers using state owned land. State land is leased for growing in Coos, Douglas, Lincoln, and Tillamook counties. Commercial lease holders range from individuals with only a few acres under lease to large companies with several thousand acres.

IN LIEU

The Department of Agriculture collected \$66,409 in fees in 2023 for shellfish lease and production. The fees support the department's oversight of the shellfish leasing program.

EVALUATION

Not evaluated.

2.041 CENTER PIVOT IRRIGATION EQUIPMENT

Oregon Statute: 307.398

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.033, Farm Machinery and Equipment](#)

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.033	Included in 2.033
2025-27	Included in 2.033	Included in 2.033

DESCRIPTION

Center pivot irrigation equipment used in farm operations is exempt from property taxation. The revenue impact for this tax expenditure is contained in [2.033, Farm Machinery and Equipment](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of farming and ease tax administration.

WHO BENEFITS

Farmers who own center pivot irrigation equipment receive benefits from this provision.

EVALUATION

Provided by the Oregon Department of Agriculture

See evaluation for [2.033, Farm Machinery and Equipment](#).

2.042 OTHER FARM/AQUACULTURE/EGG EQUIPMENT

Oregon Statute: 307.397

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.033, Farm Machinery and Equipment](#)

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.033	Included in 2.033
2025-27	Included in 2.033	Included in 2.033

DESCRIPTION

Certain machinery and equipment used in farm operations is exempt from property taxation. Under this section of statute, the following are exempt:

- Frost control systems
- Trellises for hops and other agricultural purposes
- Hop harvesting equipment
- In-water racks and other equipment for raising bivalve mollusks
- Equipment used in production and preparation of eggs for market
- Greenhouses that do not have a permanent heat source other than radiant heating provided by direct sunlight.

The revenue impact for this provision is included under [2.033, Farm Machinery and Equipment](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of farming and ease tax administration.

WHO BENEFITS

Farmers who own the specified equipment receive benefits from this provision.

EVALUATION

Provided by the Oregon Department of Agriculture

See evaluation for [2.033, Farm Machinery and Equipment](#).

2.043 FIELD BURNING SMOKE MANAGEMENT EQUIPMENT

Oregon Statute: 307.391

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.033, Farm Machinery and Equipment](#)

	Revenue Impact	
	Loss	Shift
2023-25	Included in 2.033	Included in 2.033
2025-27	Included in 2.033	Included in 2.033

DESCRIPTION

Radio communications equipment, meteorological equipment, or other tangible personal property used in connection with the operation of the field burning smoke management program (administered by the Oregon Department of Agriculture) is exempt from property taxation.

The goal of the smoke management program is to offer maximum opportunities for open field burning, propane flaming, and stack burning with minimal smoke impacts on the public. At a minimum, farmers are required to have a radio to receive information regarding field burning. The field burning equipment itself would be exempt under tax expenditure [2.033, Farm Machinery and Equipment](#), as long as the burning was conducted for the purpose of soil maintenance for farming use.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce the cost of ownership of equipment used in conjunction with the field burning smoke management program.

WHO BENEFITS

All farmers who own the specified equipment receive benefits from this provision. Approximately 30 growers burn fields each year.

EVALUATION

Provided by the Oregon Department of Agriculture

With the restrictions on field burning put in place by the 2009 Legislature, the number of farmers using field burning has decreased. In some parts of the state, based on the type of grass seed produced, field burning is the only available management technique, subsequently the practice is still used.

2.044 CRAB POTS

Oregon Statute: 508.270

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: \$15 million

	Revenue Impact	
	Loss	Shift
2023-25	\$400,000	Less than \$100,000
2025-27	\$500,000	\$100,000

DESCRIPTION

Crab pots used by an owner with a commercial fishing license used with a commercially licensed boat are exempt from property tax if proof of required licensing is furnished to the assessor by August 1 of the assessment year.

Crab pots are considered personal property and would be fully taxable without this exemption. Because crab pots can be stored on land and then moved to the sea, they are not considered part of the vessel. This is unlike other types of fishing, where fishing gear (nets, hooks, lines, etc.) is considered part of the ship and its value is included when the vessel is assessed (see 2.139, [Watercraft Locally Assessed](#)).

Approximately 149,300 crab pots were expected to be used for the 2023 crab fishing season, which is at the maximum limit set by the Oregon Fish and Wildlife Commission. Depending on the vessel, the limit of crab pots per vessel can be 200, 300 or 500. These limits have been in effect since the 2006–07 crab season. Each crab pot requires a buoy tag, costing \$1.15 each, for each fishing season. Buoy tag receipts are used exclusively to purchase the buoy tags for the following year.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to make the treatment of crab fishing operations more consistent with those of other types of fishing.

WHO BENEFITS

Owners or operators of commercial crab fishing vessels. For the 2023 crab fishing season, owners/operators of over 420 vessels had crab permits.

IN LIEU

In 2023 the fees for a crab permit per vessel were \$202 resident, and \$252 non-resident. In 2023 the Oregon Department of Fish and Wildlife collected over \$60,880 from resident and over \$34,882 from non-resident crab fishers in crab permits. Those funds are used by ODFW for commercial fishery management. In addition, owners of vessels used for crab fishing are required to obtain the proper commercial boat and crew member licenses.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

This expenditure has effectively achieved its purpose. It provides tax relief to crab fishing operations, and it makes the property tax treatment of crabbing operations consistent with that of other types of fishing.

2.045 LAND LEASED FROM STATE LAND BOARD

Oregon Statute: 307.168

Sunset Date: None

Year Enacted: 1982

2023-24 Estimated Reduction in the Taxable Assessed Value: \$110 million

	Revenue Impact	
	Loss	Shift
2023-25	\$2,600,000	\$500,000
2025-27	\$2,700,000	\$500,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, the following land leased from the State Land Board or Department of State Lands is exempt from property taxation: submerged, submersible, and grazing land. The exemption does not apply to any buildings, improvements, mines, minerals, or quarries on the land, but does include any water rights appertaining to the land.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to provide property tax relief to livestock owners and to avoid administrative difficulty of valuing state property with its restrictions on land use.

WHO BENEFITS

Lessees benefit through reduced costs.

EVALUATION

Provided by the Department of State Lands

This exemption is effective in achieving its purpose. As trustee of the Common School Fund, the state manages lands owned by the Fund in order to maximize revenue, consistent with long term resource stewardship. Exempting leased Common School lands from taxation can help increase lease income, and therefore furthers the primary trust obligation.

2.046 NATURAL GAS PIPELINE EXTENSION

Oregon Statute: 307.107

Sunset Date: None

Year Enacted: 2007

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.4 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, all property (real, personal, tangible, and intangible) used for a natural gas pipeline extension project is exempt from property taxation if:

- Project is partially financed by Oregon Unified International Trade Fund
- Length of pipeline does not exceed 115 miles
- Owner of the property is a local government.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to clarify that under certain conditions government-owned pipeline is exempt if leased.

WHO BENEFITS

The only known natural gas pipeline that qualifies is approximately 76 miles of pipeline owned by Coos County and leased to NW Natural.

EVALUATION

Not evaluated.

2.047 SOLAR PROJECTS

Oregon Law: Ore. Laws 2015 c.571, 2019 c.628, and 2021 c.571

Sunset Date: 01-01-2028 (for new agreements)

Year Enacted: 2015

2023-24 Estimated Reduction in the Taxable Assessed Value: \$320 million

	Revenue Impact	
	Loss	Shift
2023-25	\$7,500,000	\$1,300,000
2025-27	\$8,200,000	\$1,500,000

DESCRIPTION

Property constituting a solar project located in an unincorporated county area is exempt from property taxes when an agreement has been made between the governing body of the county and the owner of the solar project. A portion of the solar project may be located within the boundaries of an incorporated city, however in that case, the governing body of the city must also be a party to the agreement. A fee in lieu of property taxes is required as part of the agreement.

The agreement is limited to 20 consecutive years. The last day an agreement can be made is January 1, 2028.

If the owner of the solar project fails to pay the fee in lieu of property taxes by the prescribed date, the property does not receive an exemption the following property tax year. If the owner pays the delinquent fee plus interest within a year, the property can resume the exemption for the subsequent property tax year. However, if the owner fails to pay the fee in lieu of property taxes for more than one year, the property is disqualified from receiving this exemption from property taxes.

Legislation in 2021 (SB 154) changed the terms of the fee and extended the sunset from January 1, 2022, to January 1, 2028.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 3492 (2015), "The policy purpose of this measure is to provide tax relief and tax stability to utility scale solar production property owners and developers, which subsequently encourages the development of utility scale solar production."

WHO BENEFITS

Owners of solar projects who have made an agreement with a county to receive a property tax exemption for that property. For property tax year 2023-24, a total of 31 solar projects had an agreement to receive this property tax exemption. These projects are presently located in the counties of Deschutes, Harney, Jackson, Klamath, Lake, Polk, and Sherman. For 2024-25, the number of projects with an agreement for this property tax exemption are projected to increase to 36.

IN LIEU

The fee in lieu of property taxes amount is computed at a rate not less than \$5,500, and not more than \$7,000, per megawatt of nameplate capacity of the solar project for each property tax year. Based on their capacity, participating projects have total fees in lieu of property taxes in the amount of about \$1,900,000 for 2023-24.

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure should contribute to the development of utility scale solar energy projects in Oregon by offering rural jurisdictions and the developers another way to reduce property tax payments. The main existing option is the three to five year exemption in a Rural Renewable Energy Development Zone (RRED Zone – see expenditure 2.018, [Rural Renewable Energy Development Zone](#)). To stimulate solar energy development in Oregon, the Legislature has also provided special utility policies and funds, including the Solar Development Incentive grant program.

The department lacks data or direct experience with this expenditure, but there have been projects previously proposed in a RRED Zone, for which the county government and project owners later agreed to use this expenditure instead. In other cases, the decision was made for solar projects to stay with or opt for the RRED Zone exemption.

The net tax effect of using this expenditure versus a RRED Zone is difficult to generalize about and depends on situational factors and project characteristics. The predictable long term cash flows with this tax expenditure are evidently much better suited to the business models of solar project developers. There might also be an advantage for local governments, compared to the short term property taxes forgone in a RRED Zone followed by longer term but harder to predict tax receipts.

2.048 COOPERATIVE PROVIDING HEAT BY COMBUSTION OF BIOMASS

Oregon Statute: 308.521

Sunset Date: 06-30-2025

Year Enacted: 2019

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available*

	Revenue Impact	
	Loss	Shift
2023-25	Not Available*	Not Available*
2025-27	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue impact numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer but could at a later date.

DESCRIPTION

Property that is owned or used by a predominately public-owned cooperative for the purpose of providing steam or hot water heat by combustion of biomass is exempt from property tax for property tax years beginning on or after July 1, 2019. The cooperative corporation must meet the Oregon statutory definition of cooperative and be subject to central assessment by the Department of Revenue. At least 50 percent of the interest in the cooperative must be owned by public entities that are themselves exempt from property tax. Biomass is defined in ORS 315.141.

Because the legislation enacting this statute did not expressly provide a period of applicability for this tax expenditure, ORS 315.037(3) establishes that this tax expenditure shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year is 2024–25.

PURPOSE

The statute that allows this exemption does not explicitly state a purpose. The legislative staff revenue impact statement provided for HB 2458 (2019) says “the intent of this measure is to encourage cooperatives to invest in the production of biomass fueled energy that primarily serves public and tax-exempt entities.”

WHO BENEFITS

Predominantly publicly-owned cooperatives established for the purpose of providing steam or hot water heat by combustion of biomass.

EVALUATION

Provided by the Oregon Department of Energy

It is difficult to measure the impact the tax exemption has made on the number of cooperatives installing equipment that combusts biomass to generate steam or hot water heat. The ODOE Energy Incentives Program (EIP) issued tax credits to two projects involving the use of biomass under its Energy Conservation Projects income tax credit program and two biogas projects received Renewable Energy Development grants in the EIP Program as well. That tax credit program sunset in 2017. The exemption may encourage cooperatives to invest in biomass systems.

2.049 NONPROFIT SEWAGE TREATMENT FACILITIES

Oregon Statute: 307.118

Sunset Date: None

Year Enacted: 1997

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

An exemption from property taxes is allowed for wastewater treatment, sewage treatment, and related property owned by a nonprofit corporation engaged solely in wastewater treatment and sewage treatment facility applications. The nonprofit corporation must have been in existence as of January 1, 1997, and the facilities must have been constructed and in operation on January 1, 1997. The exemption was created for the Mapleton Commercial Area Owners' Association in Lane County, and it is unlikely any other facilities could qualify for the exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to assist nonprofit sewage treatment facilities.

WHO BENEFITS

There is one entity in the state that qualifies for this exemption, the Mapleton Commercial Area Owners' Association in Lane County. The beneficiaries of this legislation are the owners of the homes and businesses that are members of the Mapleton Commercial Area Owners' Association.

EVALUATION

Not evaluated.

2.050 RIPARIAN HABITAT LAND

Oregon Statute: 308A.362

Sunset Date: None

Year Enacted: 1981

2023-24 Estimated Reduction in the Taxable Assessed Value: \$16 million

	Revenue Impact	
	Loss	Shift
2023-25	\$400,000	Less than \$100,000
2025-27	\$400,000	Less than \$100,000

DESCRIPTION

Land designated as riparian land by the Oregon Department of Fish and Wildlife (ODFW) is exempt from property taxation. Designated riparian land must be privately-owned stream beds and the land under adjacent vegetation influenced by the proximity to water, but which does not extend more than 100 feet from the stream bank.

The following types of designated riparian land qualify for the exemption:

- Lands located outside urban growth boundaries (UGB) and zoned as forest or agricultural (including range land) in compliance with statewide planning goals.
- Lands that were outside a UGB and zoned as forest or agricultural (including range land) as of July 1, 1997, but are no longer outside a UGB or so zoned, qualify. The landowner must apply for riparian designation within five years of the change.
- Lands within city and urban growth boundaries may qualify if the city and county authorize the exemption (ORS 308A.360).

ODFW can designate land as riparian habitat land if the owner has developed and implemented a plan for continued protection of the land using approved rehabilitation techniques. For lands within city and urban growth boundaries, ODFW can approve up to 50 applications per year.

The exemption continues until withdrawn by the owner or use is incompatible with riparian use. Upon withdrawal or disqualification, an additional tax equal to the sum of the tax benefit for each year exempt (up to five years) is due.

If the land is specially assessed as farm, forest, or open space before riparian designation, any additional tax for a change in designation to riparian is abated.

PURPOSE

To “maintain, preserve, conserve and rehabilitate riparian lands to assure the protection of the soil, water, fish and wildlife resources of the state for the economic and social well-being of the state and its citizens...to prevent the forced conversion of riparian environments to more intensive uses as a result of economic pressures caused by the assessment of those lands...at values incompatible with their protection as riparian lands and that tax exemption must be granted to permit the continued availability of riparian environments...” (ORS 308A.353).

WHO BENEFITS

Owners of land that has been designated by the Department of Fish and Wildlife as riparian land.

There are 148 landowners enrolled in the Riparian Lands Tax Incentive Program across 21 counties.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

The Riparian Lands Tax Incentive Program (RLTIP) offers a property tax incentive to property owners for improving or maintaining qualifying riparian lands which can include up to 100 feet from a waterway. Under this program, property owners file a Riparian Management Plan with the Oregon Department of Fish and Wildlife and County to receive a complete property tax exemption for the qualifying riparian lands on their property, provided measures are implemented to protect, conserve, and restore the riparian land.

The main limitation for enrollment in the RLTIP is the small tax benefit of enrolling a polygon that is less than 200 feet wide. The landowners are currently taxed at either a farm or forest rate, and a tax exemption for enrolling a polygon within this area is often not worth the effort.

2.051 ENVIRONMENTALLY SENSITIVE LOGGING EQUIPMENT

Oregon Statute: 307.827

Sunset Date: None

Year Enacted: 1999

2023-24 Estimated Reduction in the Taxable Assessed Value: \$310 million

	Revenue Impact	
	Loss	Shift
2023-25	\$6,900,000	\$700,000
2025-27	\$7,400,000	\$800,000

DESCRIPTION

Environmentally sensitive logging equipment, defined as logging equipment manufactured after 1992, is exempt from property taxes. Machinery and equipment exempt under this provision is:

- Used or held for use in logging or forest management operations; and
- Specifically designed for activities related to water quality or fish and wildlife habitat protection in the forest; or
- An excavator used or held for use in logging road construction, maintenance, reconstruction, or improvements, including the closing or obliterating of existing forest roads.

PURPOSE

“...to facilitate the transition of older logging equipment to newer equipment designed and manufactured to be as environmentally sensitive as current technology can provide, consistent with the need to match the equipment to the specifics of the site being harvested” (ORS 307.824).

WHO BENEFITS

Owners of logging equipment manufactured after 1992 benefit from this exemption. From the most recent data available from 2021-22, there were over 850 exempt accounts located in 20 counties.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

The effectiveness of this exemption has not been evaluated because its potential benefits to fish habitat are indirect. Yet log suspension in riparian zones, less ground and soil compaction and less sedimentation provide immediate improvements to aquatic habitat that fish depend on. The level of habitat improvement is expected to increase in proportion to the extent that the use of environmentally sensitive equipment replaces the use of less sensitive methods.

2.052 SKYLINE AND SWING YARDERS

Oregon Statute: 307.831

Sunset Date: None

Year Enacted: 1999

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in 2.051, [Environmentally Sensitive Logging Equipment](#)

	Revenue Impact	
	Loss	Shift
2023-25	Included in 2.051	Included in 2.051
2025-27	Included in 2.051	Included in 2.051

DESCRIPTION

Skyline and swing yarders capable of full log suspension are exempt from property taxation. Such logging equipment is used to lift logs by use of cables from the forest to a central location, usually near a logging road, especially when the terrain is steep and the use of traditional wheeled equipment is not feasible.

PURPOSE

“...to facilitate the transition of older logging equipment to newer equipment designed and manufactured to be as environmentally sensitive as current technology can provide, consistent with the need to match the equipment to the specifics of the site being harvested” (ORS 307.824).

WHO BENEFITS

See 2.051, [Environmentally Sensitive Logging Equipment](#).

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

See 2.051, [Environmentally Sensitive Logging Equipment](#).

2.053 FOREST FIRE PROTECTION ASSOCIATION

Oregon Statute: 307.125

Sunset Date: None

Year Enacted: 1957

2023-24 Estimated Reduction in the Taxable Assessed Value: \$13 million

	Revenue Impact	
	Loss	Shift
2023-25	\$300,000	Less than \$100,000
2025-27	\$400,000	Less than \$100,000

DESCRIPTION

All personal and real property of forest protection districts, organizations, associations, and agencies is exempt from property taxation if the property is used exclusively for forest protection and fire suppression under ORS Chapter 477. A forest protective association is defined as an association, group, or agency composed of owners of forestlands, organized for the purpose of protecting such forestlands from fire. Examples of property held by associations may include trucks, radios, fire engines, trailers, and utility vehicles.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to help keep the cost of protecting timber assets low.

WHO BENEFITS

Forest protection organizations. Most of the property of forest protection entities has been handed over to the Department of Forestry, and the associations work under contract or cooperative agreement with the department. Currently, there are 12 forest protection districts in the state, with nine of them managed by one agency, the Department of Forestry, and the other three managed by three separate forest protective associations. The three largest associations operate in Douglas County, Coos and Curry counties, and northern Klamath County.

EVALUATION

Provided by the Oregon Department of Forestry

This provision is effective in achieving its purpose. The costs of providing forest fire prevention and suppression varies among districts due to the fuel and weather conditions that prevail on the lands protected and the risks and hazards that exist. It appears that this tax treatment provides the equity desired, as the purely administrative costs do not appear to be different among the various districts, whether association or state operated. Because the expenses of these associations are largely borne by the forest landowner, the associations would likely raise the assessments to landowners if this property were not exempt.

2.054 FEDERAL STANDING TIMBER UNDER CONTRACT

Oregon Statute: 307.050

Sunset Date: None

Year Enacted: 1965

2023-24 Estimated Reduction in the Taxable Assessed Value: \$78 million

	Revenue Impact	
	Loss	Shift
2023-25	\$1,800,000	\$300,000
2025-27	\$1,900,000	\$300,000

DESCRIPTION

In general, when public property is held under contract of sale to a private individual or business, it is considered taxable. However, federal standing timber is exempt from property tax even if held under a contract of sale. Many timber contracts allow three years from the time of sale to the time of harvest. Federal standing timber not under contract of sale is included in [2.093, Federal Property](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of the timber industry by reducing the property tax burden on timber sold by the federal government to the industry.

WHO BENEFITS

Companies buying federal standing timber for harvest. This includes both large and small companies that either do not have private timber supplies or who supplement their own supplies with federal timber. The volume of federal timber under contract was approximately 710 million board feet in 2023 and sold on average at about \$190 per thousand board feet.

EVALUATION

Provided by the Oregon Department of Forestry

This expenditure is effective in achieving its purpose. It makes the treatment of federal timber under contract consistent with that of other standing timber.

2.055 STATE AND LOCAL STANDING TIMBER UNDER CONTRACT

Oregon Statute: 307.100

Sunset Date: None

Year Enacted: 1965

2023-24 Estimated Reduction in the Taxable Assessed Value: \$64 million

	Revenue Impact	
	Loss	Shift
2023-25	\$1,500,000	\$300,000
2025-27	\$1,600,000	\$300,000

DESCRIPTION

In general, when public property is held under contract of sale to a private individual or business, it is considered taxable. However, state or local government standing timber is exempt from property taxation even if held under a contract of sale.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to treat timber under contract like other private standing timber in Oregon, which under current law is treated as a crop, not as real property.

WHO BENEFITS

Companies buying state or local standing timber for harvest. This includes both large and small companies that either do not have private timber supplies or who supplement their own supplies. The volume of state timber under contract was about 210 million board feet in fiscal year 2023 and sold on average at about \$510 per thousand board feet. The volume of local timber under contract is unknown but is thought to be small.

EVALUATION

Provided by the Oregon Department of Forestry

This expenditure is effective in achieving its purpose. It makes the treatment of state and local timber under contract consistent with that of other standing timber.

2.056 WESTERN PRIVATE STANDING TIMBER

Oregon Statute: 321.272

Sunset Date: None

Year Enacted: 1977

2023-24 Estimated Reduction in the Taxable Assessed Value: \$20 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$455,000,000	\$80,600,000
2025-27	\$489,000,000	\$86,600,000

DESCRIPTION

Privately owned standing timber in western Oregon is exempt from local property taxes. Western Oregon includes Benton, Clackamas, Clatsop, Columbia, Coos, Curry, Douglas, Hood River, Jackson, Josephine, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Tillamook, Washington, and Yamhill counties.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of timber production by eliminating the property tax burden and to lessen the incentive to prematurely liquidate immature timber by decreasing the holding costs of keeping the timber on the stump and growing.

WHO BENEFITS

Private timber owners in western Oregon. In fiscal year 2023–24 there were about 6 million acres of private land classified as forestland for property taxation purposes located in western Oregon.

EVALUATION

Provided by the Oregon Department of Forestry

Before 1977, both land and timber were taxed as property. In some cases this led to premature harvesting to lower property tax burden. To encourage holding timber to longer rotation ages, the property tax on the value of the timber was eliminated, but a yield tax on timber harvest was retained. In 1993, in recognition of the agricultural crop nature of growing timber and the substantial investment it requires, the tax on the crop (privilege tax) was eliminated.

There are indications that timber harvests average approximately 50 years, and that the total private timber harvest, while declining since the late 1950s, has been essentially at sustainable levels through the past decade.

Information is lacking on the effectiveness of other methods of discouraging premature timber harvests. Regulatory methods would likely be exceedingly expensive to administer, and variable tax rates would require nearly confiscatory levels for young timber in order to be effective.

2.057 EASTERN PRIVATE STANDING TIMBER

Oregon Statute: 321.829

Sunset Date: None

Year Enacted: 1961

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.4 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$32,500,000	\$5,800,000
2025-27	\$34,900,000	\$6,200,000

DESCRIPTION

Privately owned standing timber in eastern Oregon is exempt from local property taxation. Eastern Oregon includes Baker, Crook, Deschutes, Gilliam, Grant, Harney, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler counties.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to improve the financial viability of timber production by eliminating the property tax burden and to lessen the incentive to prematurely liquidate immature timber by decreasing the holding costs of keeping the timber on the stump and growing.

WHO BENEFITS

Private timber owners in eastern Oregon. In fiscal year 2023-24 there were about 2 million acres of private land classified as forestland for property taxation purposes located in eastern Oregon.

EVALUATION

Provided by the Oregon Department of Forestry

Before 1977 in Western Oregon and 1961 in Eastern Oregon, both land and timber were taxed as property. In some cases this led to premature harvesting to lower property tax burden. To encourage holding timber to longer rotation ages, the property tax on the value of the timber was eliminated, but a yield tax on timber harvests was retained. In 1993, in recognition of the agricultural crop nature of growing timber and the substantial investment it requires, the tax on the crop (privilege tax) was eliminated.

2.058 PRIVATE FARM AND LOGGING ROADS

Oregon Statute: 308.236

Sunset Date: None

Year Enacted: 1963

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.9 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$45,300,000	\$8,000,000
2025-27	\$49,000,000	\$8,700,000

DESCRIPTION

Farm, grazing, and logging roads on private land are exempt from local property taxation. Exempt property also includes the culverts, drains, fill, surfacing, and bridges associated with these roads. The land under the roads is taxable. The exemption does not apply to principal exterior timber access roads, which are two-lane improved roads that are continuously maintained and connect a timber conversion center or public highway to a principal forest area. Many logging roads are built specifically to allow timber to be harvested. Once the harvest is finished, the roads have little or no value. Some logging roads, however, are used for forest management and fire suppression on an ongoing basis, so they maintain value long after they are built.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid the administrative difficulty of valuing these roads, most of which are logging roads.

WHO BENEFITS

Owners of farm and timberland where roads have been built. Most of the value exempt under this provision is logging roads. Logging roads are expensive to build because they must accommodate heavy logging equipment and are usually built in hilly or mountainous terrain. Farm roads are generally on flat land and involve little cost to build. Oregon Department of Forestry estimates that there are approximately 85,000 miles of logging roads on private lands.

EVALUATION

Not evaluated.

2.059 NONPROFIT PUBLIC PARK USE LAND

Oregon Statute: 307.115

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: \$9.7 million

	Revenue Impact	
	Loss	Shift
2023-25	\$300,000	Less than \$100,000
2025-27	\$400,000	Less than \$100,000

DESCRIPTION

Nonprofit corporation property used for public park or recreation purposes is exempt from property taxation if the following conditions are met:

- The purpose of the corporation is to acquire park or recreation property or maintain and operate a public park and recreation facility.
- The property is used for public park or public recreation purposes and cannot be used to produce income.
- Any net earnings of the corporation must not benefit any private individual.

- Upon dissolution, any remaining assets must revert to the state or a local government.
- The granting authority (either a city or a county governing body depending on which has jurisdiction) approves the application for exemption.

The nonprofit corporation must file an application with the county assessor to claim the exemption. The city or county governing body having jurisdiction will act on the application. This exemption is for 10 years and is renewable by reapplication.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage development of parks by private nonprofit corporations.

WHO BENEFITS

Nonprofit corporations with property used for public park or recreation purposes. Counties report 19 property tax accounts received this exemption in tax year 2023-24.

EVALUATION

Provided by the Oregon Parks and Recreation Department

This exemption appears to be effective in achieving its implied purpose by encouraging the preservation of open space and park land. Little information or resources exist to allow an in-depth evaluation of this program, but as a matter of public policy, it contributes to Oregon's quality of life and helps meet the needs of Oregon's growing population for parks, open spaces, greenways, natural settings, and recreational facilities. The program supplements what the government can provide by encouraging land protection and management decisions by nongovernment entities that also contribute to the public good. Studies show that parks and recreational facilities do contribute to local economies.

2.060 INACTIVE MINERAL INTERESTS

Oregon Statute: 308.115

Sunset Date: None

Year Enacted: 1997

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Mineral interests owned separately from surface interests are exempt from local property tax if the property is not being mined.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to eliminate the administrative expense of assessing this property.

WHO BENEFITS

Owners of mineral interests who are not actively mining those interests.

EVALUATION

Not evaluated.

2.061 MINING CLAIMS ON FEDERAL LAND

Oregon Statute: 307.080

Sunset Date: None

Year Enacted: 1898

2023-24 Estimated Reduction in the Taxable Assessed Value: \$25 million

	Revenue Impact	
	Loss	Shift
2023-25	\$600,000	\$100,000
2025-27	\$600,000	\$100,000

DESCRIPTION

Unpatented mining claims on federal property are exempt from local property taxation. Any improvements or equipment on the claim are taxable. Unpatented mining claims are private claims to public land without the federal government having conveyed title.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce the administrative expense associated with assigning value to mining claims which are intangible in nature.

WHO BENEFITS

As of June 2024, there were about 12,600 active mining claims in Oregon. Claims range in size depending in part upon their type.

IN LIEU

Claimants generally pay annual maintenance fees to continue to hold their claims.

EVALUATION

Not evaluated.

2.062 SMALL WATERCRAFT

Oregon Statute: 830.790(3)

Sunset Date: None

Year Enacted: 1959

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.3 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$66,300,000	\$14,700,000
2025-27	\$67,700,000	\$15,000,000

DESCRIPTION

Sailboats over twelve feet, all motorboats, and amphibious vehicles requiring registration from the State Marine Board are exempt from property tax. Boats of water transportation companies that are centrally assessed are not eligible for the exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid administrative difficulties associated with valuing mobile property.

WHO BENEFITS

In 2023, there were approximately 139,000 boats registered in Oregon.

IN LIEU

Fees for registration and title were \$8.3 million in 2023, and are in lieu of any other tax or license fees. Registration fees are paid every two years and are based on a flat fee of \$5.95 per foot of watercraft length for sailboats 12 feet or more and all motorboats. In addition, a \$5.00 Aquatic Invasive Species Surcharge is due with each of these registrations. Registration fees for amphibious vehicles are \$6.

No fee is required for boats owned by eleemosynary organizations which are operated primarily as a part of organized activities for the purpose of teaching youths scout craft, camping, seamanship, self-reliance, patriotism, courage, and kindred virtues. Boating programs are funded entirely by user fees.

EVALUATION

Provided by the Oregon State Marine Board

The exemption achieves its purpose. Fees for registration and title fund key programs that benefit small watercraft owners, such as Law Enforcement, Facilities and Aquatic Invasive Species Prevention. This exemption is an extension of the personal property for personal use exemption, which is analogous to personal use motor vehicles, recreational vehicles, all-terrain vehicles, and personal aircraft (all of which are exempt). The exemption eases the administrative problems that are inherent in assessing property taxes on mobile personal property that tends to decrease in value over time.

2.063 MOTOR VEHICLES AND TRAILERS

Oregon Statute: 803.585

Sunset Date: None

Year Enacted: 1921

2023-24 Estimated Reduction in the Taxable Assessed Value: \$53 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$1,510,000,000	\$336,000,000
2025-27	\$1,570,000,000	\$350,000,000

DESCRIPTION

Most vehicles are exempt from property taxation. The exemption covers virtually all vehicles that transport people or goods over public roads including cars, trucks, buses, most travel trailers, campers, and motorcycles.

Travel trailers include park trailers less than 8½ feet wide. Although travel trailers are normally exempt from property taxation, an owner may have one assessed for property taxation if the trailer is used as a permanent home or for purposes other than recreation (ORS 308.880). No registration as a vehicle is needed in this case.

Fixed-load vehicles that are not used primarily to transport people or property over public roads are generally taxable.

Owners of exempt vehicles are required to pay registration fees in lieu of property taxes.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing property that is subject to registration fees.

WHO BENEFITS

In 2023, there were about 3.47 million registered passenger vehicles and about 897,000 other registered vehicles and trailers in Oregon.

IN LIEU

The two-year registration fee for passenger vehicles is based on fuel economy. For vehicles with miles-per-gallon (MPG) of 0-19 the fee is \$126. The fee is \$136 for vehicles with MPG of 20-39. The fee is \$156 for vehicles with MPG of 40 or higher. The fee for electric vehicles is \$316 unless the vehicle is enrolled in the OReGO program. Fees for motorcycles and mopeds are \$88. The four-year new car registration fees are higher. The fee for large trucks and buses varies by

registered weight. Other on- and off-road vehicles have different fees for various time periods. The registration fees are forecasted to be \$604.5 million in 2023–25 and \$623.7 million in 2025–27.

EVALUATION

Provided by the Oregon Department of Transportation

The vehicle registration fees support the costs to administer the Driver and Motor Vehicle Division. Revenue net of these costs is shared between ODOT and Oregon's counties and cities. In addition, registration fees have been raised through legislation to support the debt service on bonds for large transportation improvement programs.

Removal of this exemption would allow for the imposition of ad valorem taxes on vehicles, increasing both highway dedicated revenue and administrative costs.

2.064 ODOT LAND UNDER USE PERMIT

Oregon Statute: 307.110(3)(c)

Sunset Date: None

Year Enacted: 1981

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

	Revenue Impact	
	Loss	Shift
2023-25	\$0	\$0
2025-27	\$0	\$0

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, Oregon Department of Transportation (ODOT) real property used by a person under a land use permit is exempt from property taxation. The exemption applies to real property with use restrictions such that only an administrative processing fee can be charged. These are generally small parcels abutting highways used for pasture or landscaping. Other real property leased for more than an administrative fee, such as for parking or commercial displays, is taxable.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to lower the cost for taxpayers using ODOT property under a use permit, and to avoid the administrative difficulty of valuing this property.

WHO BENEFITS

People using property with use restrictions under permit.

IN LIEU

As of 2023, ODOT has 182 active permits that provide approximately \$9,000 in annual administrative fees. By permitting this use, ODOT saves maintenance and weed control costs.

EVALUATION

Not evaluated.

2.065 TOLLWAYS AND RELATED FACILITIES

Oregon Statute: 383.017(1)

Sunset Date: None

Year Enacted: 1995

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

	Revenue Impact	
	Loss	Shift
2023-25	\$0	\$0
2025-27	\$0	\$0

DESCRIPTION

Tollways—and any related facilities that would normally be purchased, constructed, or installed by the Oregon Department of Transportation (ODOT) if the tollway were a conventional highway that was constructed and operated by ODOT—are exempt from property taxation. Without this exemption, private property used for tollways or public property that is transferred to private use for tollways might otherwise be taxable.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. However, a statute related to tollways (ORS 383.001) states “because public funding sources are not providing the state with sufficient funds to meet all of its transportation needs, private funding should be encouraged as an additional source of funding for transportation projects and facilities.” This exemption presumably encourages the construction of transportation infrastructure by treating privately-owned tollways the same as publicly-owned tollways from a property taxation perspective. Privately-owned tollways would presumably serve the same public purpose as public tollways.

WHO BENEFITS

No taxpayer is using this provision. Potential beneficiaries include private investors in tollways, presumably as part of public-private partnerships.

EVALUATION

Not evaluated.

2.066 FOREIGN-OWNED AIRCRAFT AND AIRCRAFT NOT OWNED BY AIR TRANSPORTATION COMPANIES

Oregon Statute: 308.558(4) and (5)

Sunset Date: None

Year Enacted: 1987

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.1 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$30,500,000	\$6,800,000
2025-27	\$31,100,000	\$6,900,000

DESCRIPTION

Generally, aircraft not owned by air transportation companies are exempt from property taxation but pay registration fees to the Department of Aviation. Aircraft owned or used by a foreign (international) carrier are exempt from property taxation.

Aircraft owned by air transportation companies are described in 2.119, [Aircraft Under 75,000 Pounds Owned by Air Transportation Companies](#).

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to avoid taxing property that is generally subject to registration fees.

WHO BENEFITS

The Department of Aviation annually registers approximately 3,400 aircraft that are exempt from property tax. In addition, foreign or international carriers benefit from this exemption.

IN LIEU

The annual registration fee for aircraft not owned by a foreign carrier varies from \$700 for a turbojet to \$25 for a UAS (drone) under 55 pounds. The Department of Aviation received approximately \$389,000 in registration fees for aircraft registered in 2023.

EVALUATION

Provided by the Department of Aviation

The direct recipients of the tax expenditure are the aircraft owners of aircraft that are not owned by air transportation companies as well as foreign owned aircraft. These aircraft range from large turbojets to small Unmanned Aircraft Systems (UAS). The large turbojets are generally owned by large private companies and the UAS are often owned by individuals. The benefits also flow through to aircraft dealers in Oregon, businesses in Oregon that own aircraft as well as aviation businesses in Oregon that may have more business due to this tax expenditure.

The measurable benefits to the aircraft owner would be a substantial tax savings. The immeasurable benefits may be more aircraft that are based in Oregon as opposed to neighboring states that charge aircraft property tax. For example, California charges a 1-1.2% property tax annually on aircraft based on the assessed value. Yet many aircraft owners would base their aircraft in Oregon even if there were aircraft property taxes.

If this tax expenditure were eliminated, aircraft owners of aircraft not owned by air transportation companies would pay property tax for these aircraft. There could be approximately \$10 million per year available for aviation programs in Oregon. While the statute does not explicitly state a purpose for this tax expenditure, if the purpose were to benefit aviation in Oregon then this tax expenditure could be restructured to limit those that are exempt from paying the property tax and allow the tax revenues to be used for aviation programs in Oregon.

2.067 NONPROFIT WATER ASSOCIATIONS

Oregon Statute: 307.210

Sunset Date: None

Year Enacted: 1937

2023-24 Estimated Reduction in the Taxable Assessed Value: \$13 million

	Revenue Impact	
	Loss	Shift
2023-25	\$300,000	Less than \$100,000
2025-27	\$300,000	Less than \$100,000

DESCRIPTION

Property of a mutual or cooperative water association is exempt from taxation if:

- The association is nonprofit
- The property is used primarily to store, convey, and distribute water to association members for domestic use or irrigation

- No more than 15 percent of the association's members are commercial establishments using the water for commercial purposes
- No more than 25 percent of the total annual volume of water furnished by the association is used by commercial establishments or for commercial purposes.

Property exempt under this provision includes land, improvements, fixtures, equipment, supplies, dams, and dikes.

An association seeking to claim this exemption must file an application with the county assessor. Associations do not need to reapply each year as long as the ownership and use of the property remain unchanged from the previous tax year.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage the distribution of water in areas not supplied by publicly owned water systems.

WHO BENEFITS

For tax year 2023–24, counties reported that approximately 200 property tax accounts were exempt under this provision.

EVALUATION

Provided by the Oregon Public Utility Commission

The Public Utility Commission of Oregon (Commission) currently regulates eleven nonprofit water associations that meet the definition stated above. Based on ORS 757.063, this number could potentially increase if members of nonprofit water associations petition the Commission for regulation. Commission policy has been to not assign a rate of return on rate base. As such, the associations do not earn net income (profit) maintaining their nonprofit status. As a result, the tax exemption theoretically encourages the distribution of water in areas not supplied by publicly owned water systems by allowing rates to be lower than if a profit and tax expense (income and property) were included in rates.

2.068 NONPROFIT ELECTRICAL DISTRIBUTION ASSOCIATIONS

Oregon Statute: 308.805

Sunset Date: None

Year Enacted: 1943

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.2 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$27,700,000	\$4,900,000
2025-27	\$32,500,000	\$5,700,000

DESCRIPTION

The transmission and distribution lines of a mutual or cooperative electrical association are exempt from local property taxation if:

- The association is nonprofit
- The principal purpose of the association is to distribute electricity to its members.

The exemption for transmission and distribution lines includes all property that is energized or energizable and all property supporting or integrated with energized or energizable property. This includes but is not limited to substations, poles, conductors, transformers, services, meters, streetlights, easements, generators, communication equipment, lines leased to government agencies, tools, supplies, and office furniture and equipment.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid the difficulty of assessing electrical lines and to encourage the distribution of electricity in areas not supplied by for-profit companies because of the distribution cost.

WHO BENEFITS

Nineteen cooperatives are exempt under this provision.

IN LIEU

All exempt associations must pay an electric cooperative tax in lieu of the property tax, calculated as the lesser of four percent on gross revenue minus power costs or a tax at the Measure 5 limits plus any applicable county bond rate. Gross revenue includes all revenue from the operation of electric distribution systems except line lease payments from government agencies. For more information, see [Electric Cooperative Tax on page 349](#).

Proceeds from the gross revenue based payments are distributed to the counties in proportion to each association's wire miles in each county. Within each county, 66.7 percent goes to the county and 33.3 percent to the county school fund. Proceeds from the other method are distributed according to ORS 311.390.

For tax years 2023–24 and 2024–25, the electric cooperative tax paid by these 19 cooperatives was \$11.4 million and \$12.4 million, respectively. That tax was based on gross revenues for 15 out of the 19 cooperatives in both years. See Chapter 10 for more information.

EVALUATION

Provided by the Oregon Public Utility Commission

This provision appears to be effective in achieving its purpose, but an in-depth evaluation of the program is not possible because these cooperatives are not regulated. All 19 electric cooperatives in the state qualify for the exemption and are charged the in lieu tax. As a result, their distribution lines need not be assessed for property tax purposes, resulting in savings for both the utilities' ratepayers and taxpayers.

2.069 PROPERTY USED FOR DISASTER OR EMERGENCY RELATED WORK

Oregon Statute: 401.690(1)(d)

Sunset Date: None

Year Enacted: 2015

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

Revenue Impact		
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

Property brought into Oregon solely for use during a disaster response period to repair critical infrastructure and subsequently removed is not subject to taxation.

See [1.505, Nonresident Disaster Related Income](#) for a similar expenditure for corporate and personal income taxes.

Legislation in 2019 (HB 2127) explicitly excluded this exemption from the automatic six-year sunset under ORS 315.037.

PURPOSE

"To ensure that businesses may focus on quick response to the needs of this state and its residents during a declared disaster or emergency, it is appropriate for the Legislative Assembly to deem that this activity for a reasonable period of time before, during and after the disaster or emergency for repairing and restoration of the often devastating damage to critical infrastructure in this state as defined in section 3 of this 2015 Act does not establish presence, residency,

doing business in this state or any other criteria for purposes of state and local taxes or licensing and regulatory requirements.” (ORS 401.680(5))

WHO BENEFITS

Out-of-state companies providing disaster or emergency related services in Oregon.

EVALUATION

Provided by the Oregon Department of Emergency Management

To date Oregon has not suffered from a catastrophic disaster which would require a massive influx of individuals or companies to come in and assist the State in recovery operations. The end goal of the legislation is to ease the barriers of entry for private industry in order to encourage support and investment to help expedite Oregon’s recovery from catastrophic disasters.

2.070 BEVERAGE CONTAINERS REQUIRING DEPOSIT

Oregon Statute: 307.402

Sunset Date: None

Year Enacted: 1983

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.3 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

All beverage containers that have a refund value (requiring a deposit), as specified in the Bottle Bill (ORS 459A.700–459A.744), are exempt from property tax. These containers are not considered inventory if owned by the distributor. The containers are not “sold” with the contents but are intended to be returned for a refund. Distributors must pay redemption centers the refund value for each container returned for recycling. Distributors keep the deposits on the containers that are not returned for the refund. Deposit containers for carbonated soft drinks, soda water, mineral waters, and beer or other malt beverages may be glass, metal, or plastic.

The 2007 Legislature expanded the Bottle Bill to include a refundable deposit for all bottled water and flavored water containers under three liters effective January 1, 2009. The 2011 Legislature expanded the Bottle Bill to include additional beverage containers under specified circumstances and authorized an increase of the redemption value if beverage container return rates fell below 80 percent. In August 2016, the Oregon Liquor and Cannabis Commission determined that redemption rates for containers were below 80 percent, so the deposit amount increased from 5 cents per container to 10 cents starting in April 2017. The additional beverage container types are now included in the deposit and refund process as of January 1, 2018. The 2019 Legislature added kombucha and hard seltzer beverage containers to the Bottle Bill. SB 1520 (2022) added canned wine to the list of containers that require a deposit starting July 1, 2025.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to eliminate the tax compliance burden of enumerating the containers returned.

WHO BENEFITS

The beneficiaries of this exemption are bottlers, distributors, and retail stores that temporarily hold beverage containers requiring a deposit.

EVALUATION

Not evaluated.

2.071 MANUFACTURED STRUCTURE IN HIGH-POPULATION COUNTY

Oregon Statute: 308.250(2)(b) and (3)

Sunset Date: None

Year Enacted: 2010

2023-24 Estimated Reduction in the Taxable Assessed Value: \$230 million

	Revenue Impact	
	Loss	Shift
2023-25	\$7,600,000	\$2,300,000
2025-27	\$7,700,000	\$2,400,000

DESCRIPTION

Personal property manufactured structures in some counties are exempt from property taxes if the value of the property is below certain amounts. A manufactured structure is personal property if the structure is owned separately from the land it is situated on.

In counties with a population between 340,000 and 570,000, if the total assessed value of all personal property manufactured structures owned by a taxpayer is less than \$22,500, these manufactured structures are exempt from taxation. Currently, Clackamas, Lane, and Marion Counties have a population between 340,000 and 570,000. The \$22,500 threshold applies for tax year 2024-25 and is adjusted annually.

In counties with a population of more than 570,000, there are three possible exemptions allowed:

- A full exemption of \$45,000 (for tax year 2024-25, adjusted annually for inflation)
- A full exemption of greater than \$45,000 if adopted by the county
- A partial exemption of any dollar amount if adopted by the county

For all counties with a population of more than 340,000 that opt to use one of the first two full exemptions listed above, if the total assessed value of all personal property manufactured structures owned by a taxpayer are a single dollar above the limit, the entire property is taxable. For counties with population above 570,000 that opt to use the partial exemption, all taxpayers with personal property manufactured structures will have their properties' taxable value reduced by the dollar amount adopted by the county.

Legislation in 2019 created the second and third options in the list above. At the time of publication, only Multnomah and Washington Counties have populations above 570,000. Washington County uses the full exemption of \$45,000 at the time of publication. Multnomah County adopted a resolution creating a partial exemption of \$50,000 starting in tax year 2022-23. The maximum property value amounts are adjusted annually for inflation.

This exemption does not apply to any properties in counties with fewer than 340,000 people.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2676 (2013), the purpose of this provision "...is to reduce administrative costs associated with processing personal property accounts with low value. It is also to provide tax relief to low-income homeowners living in inexpensive structures."

WHO BENEFITS

For the 2024-25 property tax year, five counties reported that more than 31,000 properties benefited from this exemption.

EVALUATION

Not evaluated.

2.072 PERSONAL PROPERTY FOR PERSONAL USE

Oregon Statute: 307.190

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$72 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$2,080,000,000	\$463,000,000
2025-27	\$2,230,000,000	\$496,000,000

DESCRIPTION

Tangible personal property held by the owner for personal use is exempt from property tax. Examples of personal property for personal use are household goods, furniture, appliances, personal effects, clothing, recreational goods, and entertainment equipment.

The exemption does not apply, although different tax exemptions might, to any property that is:

- Wholly or partially used in the ordinary course of a trade or business
- Used for the production of income or solely for investment
- Required to be licensed or registered
- A floating home, boathouse, or manufactured structure

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to reduce the administrative expense associated with assigning value to various personal property items that were not intended to be taxed as property.

WHO BENEFITS

The exemption benefits all households.

EVALUATION

Not evaluated.

2.073 HEAVY EQUIPMENT RENTAL

Oregon Statute: 307.872

Sunset Date: None

Year Enacted: 2018

2023-24 Estimated Reduction in the Taxable Assessed Value: \$420 million

	Revenue Impact	
	Loss	Shift
2023-25	\$13,100,000	\$3,100,000
2025-27	\$13,900,000	\$3,300,000

DESCRIPTION

Qualified heavy equipment held primarily for rental is exempt from property taxation. Qualified heavy equipment means any construction, mining, earthmoving or industrial equipment, together with attachments and other equipment and tools, including, but not limited to, towable trailers and fixed load vehicles. Equipment must be mobile, held primarily for rental, and owned by a qualified heavy equipment provider engaged in the business of renting heavy equipment without an operator.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to ease the burden on taxpayers in determining equipment values and locations for highly mobile rental equipment.

WHO BENEFITS

Qualified rental facilities primarily engaged in the business of renting heavy equipment without an operator. Approximately 150 properties in 29 counties received this exemption in tax year 2023-24.

IN LIEU

Taxpayers that are exempt from property taxation on their rental equipment instead pay a 2 percent tax based on the rental price of qualified heavy equipment that is collected from the renter of the equipment.

The heavy equipment rental tax (HERT) rate was designed to raise the same amount of revenue as property taxes on the affected properties. In order to achieve this outcome, for the first two tax years of the program, 2019-20 and 2020-21, the Department of Revenue estimated the amount of property taxes that would have been paid on this equipment in the absence of an exemption. The difference between what is paid for the HERT and what would have been paid under the property tax system was then billed or refunded to the taxpayer.

In July 2022, DOR submitted a [report](#) to the Legislature comparing revenues from the 2 percent tax on the rental price of heavy rental equipment to revenues that would have been raised under the property tax system, and discussion of issues administering this program.

EVALUATION

Not evaluated.

2.074 BEACH LANDS

Oregon Statute: 307.450

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

	Revenue Impact	
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

Beach lands are exempt from property taxation. However, improvements are not exempt. Generally, beach lands are those along the Pacific Ocean between the extreme low tide and the vegetation line. While much of this land is publicly owned, some is privately owned, but in most cases, it has severe restrictions on development (ORS 390.605 to 390.729). While this tax expenditure covers all beach land, regardless of ownership, the publicly owned portion of beach land would be exempt under tax expenditure [2.078, State and Local Property](#), if this provision did not exist.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to preserve public access to ocean beaches and to clarify that ocean beaches, even if privately owned, are exempt from property taxation.

WHO BENEFITS

Owners of beach front property and others who use Oregon beaches.

EVALUATION

Not evaluated.

2.075 PROPERTY OF INDIANS AND ON TRIBAL TRUST LAND

Oregon Statute: 307.180, 307.181(1), and 307.181(2)

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

Revenue Impact		
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

Real property owned by an Indian tribe or tribal member and located on an Indian reservation or tribal trust land is generally exempt from property tax. Exempt property must be real property of Indians residing upon reservations who have not severed their tribal relations or taken land in severalty. Land acquired by an Indian tribe is exempt from property taxation if the land is within ancient tribal boundaries and is held in or in the process of being placed in a U.S. trust for the tribe.

Legislation in 2015 (HB 2148) exempted from state and local property taxes and fees permanent improvements (regardless of ownership) located on land that is held in trust for a federally recognized tribe or individual member, unless the property is centrally assessed.

PURPOSE

The statutes that allow this exemption do not explicitly state a purpose. Presumably, the purpose is to replicate the status of Indians under federal law before statehood.

WHO BENEFITS

Nine federally recognized tribal governments exist in Oregon. Reservation and land in trust acreage totals approximately 900,000 acres in Oregon. Other beneficiaries include people who own permanent improvements located on land that is held in trust for a tribe or tribal member.

EVALUATION

Not evaluated.

2.076 EQUIPMENT FOR MARITIME EMERGENCY RESPONSE

Oregon Statute: 307.197

Sunset Date: None

Year Enacted: 2010

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Communications equipment, emergency response equipment and other tangible personal property is exempt from ad valorem property taxation if the equipment or property meets all three of these criteria:

- It is acquired or used primarily for the purposes of responding to and maintaining the capability to respond to shipboard fires or oil spills in navigable waters

- It is owned by a nonprofit corporation under ORS chapter 65 that operates as a maritime fire and safety association, and
- It is made available by the nonprofit corporation for use by a federal, state, or local emergency response agency pursuant to a mutual aid compact.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage nonprofit maritime fire and safety associations to own communications equipment used for maritime emergency response and to provide access for public agencies to use this specialized equipment in emergency situations.

WHO BENEFITS

Maritime fire and safety associations which own communications and emergency response equipment used primarily for the purposes of responding to shipboard fires or oil spills. Federal, state and/or local emergency response agencies may also benefit by having the ability to use the equipment.

EVALUATION

Not evaluated.

2.077 INTERSTATE BRIDGES OF LOCAL GOVERNMENTS

Oregon Statute: 381.310(10)(a)

Sunset Date: None

Year Enacted: 2017

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

	Revenue Impact	
	Loss	Shift
2023-25	\$0	\$0
2025-27	\$0	\$0

DESCRIPTION

A bridge project to cross the Columbia River under agreement with the Port of Hood River and meeting the provisions of ORS 381.205 through ORS 381.314 is exempt from property taxes. Public property generally becomes taxable when held under contract of sale or leased to a private individual or business. This provision extends the exemption provided by 2.078, [State and Local Property](#), to include bridge projects commissioned by local jurisdictions, even if the property is transferred to private ownership. The legislation that created this provision in 2017 (HB 2750) specified that it would apply to all tax years beginning on or after January 1, 2018, regardless of any sunset under ORS 315.037.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage development of a replacement bridge across the Columbia River in the vicinity of Hood River.

WHO BENEFITS

The owners of bridges that are constructed under the terms of this legislation. As of publication of this report in 2024, no bridges have yet been constructed that qualify for this exemption.

EVALUATION

Not evaluated.

2.078 STATE AND LOCAL PROPERTY

Oregon Statute: 307.090

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$110 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$3,350,000,000	\$802,000,000
2025-27	\$3,620,000,000	\$868,000,000

DESCRIPTION

State and local government property is exempt from property taxation. This includes property related to administration of state and local government, such as a city hall or state-owned building, and land owned by the state and local governments, such as public parks and forests.

Generally, if property owned by state or local government is held under contract of sale or lease by a private party, then it becomes taxable. For example, office buildings owned by the State of Oregon and used for public purposes are exempt, but space in those same buildings, if leased to a private company, is taxable. Certain nonprofit entities created by the Oregon Health and Science University are considered public corporations and thus their property can be exempt from property taxation under this provision.

The Oregon Legislature specifically exempted some types of leasehold interests that otherwise would be taxable state and local property. Revenue impacts from the following tax expenditures are included in the revenue impact for this tax expenditure.

- [2.004, Higher Education Parking Space](#)
- [2.038, Leased State and Local Farming and Grazing Land](#)
- [2.079, Corporations for Irrigation, Drainage, Water Supply or Flood Control](#)

Revenue impacts from the following tax expenditures have been subtracted from the revenue impact for this tax expenditure to avoid duplication.

- [2.003, Leased Student Housing Publicly Owned](#)
- [2.006, Leased Rural Health Care Property](#)
- [2.010, Fairground Leased Storage Space](#)
- [2.027, Leased Docks and Airports](#)
- [2.040, Shellfish Growing on State Land](#)
- [2.045, Land Leased From State Land Board](#)
- [2.046, Natural Gas Pipeline Extension](#)
- [2.055, State and Local Standing Timber Under Contract](#)
- [2.064, ODOT Land Under Use Permit](#)

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid reciprocal taxation among public entities; to avoid taxing public services that are funded through the tax.

WHO BENEFITS

State and local governments in Oregon. County assessors reported approximately 55,000 state and local government properties throughout Oregon in tax year 2023-24.

IN LIEU

The following types of property make in lieu payments to local taxing districts:

- City Property Used to Produce Energy (ORS 307.090(2))
- Fish and Wildlife Commission Lands (ORS 496.340)
- State Timber Land (Board of Forestry) (ORS 530.110–530.115)
- Common School Fund Lands (ORS 327.410–327.420).

EVALUATION

Not evaluated.

2.079 CORPORATIONS FOR IRRIGATION, DRAINAGE, WATER SUPPLY OR FLOOD CONTROL

Oregon Statute: 554.320

Sunset Date: None

Year Enacted: 1937

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in 2.078, *State and Local Property*

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.078	Included in 2.078
2025-27	Included in 2.078	Included in 2.078

DESCRIPTION

Nonprofit corporations organized for use or control of water are exempt from property taxation. The corporation must be organized as a nonprofit and all revenues and incomes of the corporation must be exclusively used for improvements or maintenance of lands subject to the corporation's rates, tolls, charges, fees, fines, or assessments.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to treat nonprofit corporations organized for use or control of water similar to local taxing districts which are exempt from property taxation under 2.078, *State and Local Property*.

WHO BENEFITS

Nonprofit corporations organized for use or control of water and members of the nonprofit corporations receiving services at presumably lower costs.

EVALUATION

Not evaluated.

2.080 LOCAL GOVERNMENT PUBLIC WAYS

Oregon Statute: 307.200

Sunset Date: None

Year Enacted: 1895

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

Revenue Impact		
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

Privately held land that is subject to a designated public right-of-way is exempt from taxation. Affected land is land “within the boundary of any county road, and all dedicated streets and alleys in any incorporated or unincorporated city or town...” The property owners do not have exclusive private use of the land. The land is not assessed and is not tracked on the assessment or tax roll.

Land subject to this exemption has economic value, but it is unclear if it carries direct value in the context of how property is valued in the property tax system. The value of the right-of-way may be captured in the increased value of adjoining lands and properties.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to compensate owners for the loss of private use of the land and to recognize the difficulty associated with placing a value on the land.

WHO BENEFITS

Owners of designated public right-of-way land.

EVALUATION

Not evaluated.

2.081 INTERSTATE BRIDGES OF OTHER STATES OR SUBDIVISIONS

Oregon Statute: 381.824

Sunset Date: None

Year Enacted: 2014

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

	Revenue Impact	
	Loss	Shift
2023-25	\$0	\$0
2025-27	\$0	\$0

DESCRIPTION

Bridges that pass over a river or body of water forming a boundary between Oregon and another state, and that are operated by another state or by a subdivision of that state are exempt from property taxation for the portion of the bridge in Oregon. This exemption is conditional on the other state similarly exempting bridges in the other state that are owned by the state of Oregon or its subdivisions from property taxation.

This property tax exemption was removed by legislation in 2007 (SB 1022); legislation in 2014 (SB 1534) reinstated this exemption and made it retroactive to January 1, 2008. In 2017 (HB 2750), the exemption was specifically expanded to include bridges owned by ports.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the exemption serves several purposes: to receive reciprocal treatment for Oregon bridges that cross into other states, to avoid the administrative difficulty of separating the value of a bridge from the likely already exempt highway, and to avoid taxing property that might be jointly owned by already exempt entities.

WHO BENEFITS

The owners of bridges that cross into Oregon that are operated by another state or any subdivision of that state. Currently no bridges qualify for this exemption, however the existence of this exemption enables two bridges owned by subdivisions of Oregon that cross into the State of Washington to be exempt from tax in that state under the agreement for reciprocal treatment.

EVALUATION

Not evaluated.

2.082 PROPERTY USED EXCLUSIVELY FOR TRIBAL GOVERNMENT SERVICES

Oregon Statute: 307.181(3)

Sunset Date: None

Year Enacted: 2012

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

	Revenue Impact	
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

Property owned exclusively by an eligible Indian tribe or by an entity wholly owned by an eligible tribe and used exclusively for certain government services is exempt from property taxation. This exemption is applicable to Indian tribal government service properties that otherwise would be taxable, usually because the property is not located on land held in trust for a tribe by the federal government. Tribe-owned properties that provide tribal government services located on Indian Reservations and that are exempt under federal law are also exempt from taxation under [2.075, Property of Indians and on Tribal Trust Land](#).

Eligible government services are specified and include tribal administration, elementary, secondary, or higher education, utility, cemeteries, and health, fire, or police services.

Certain housing properties leased or rented to low-income persons by an eligible tribe or a partnership, nonprofit corporation, or limited liability company of which an eligible Indian tribe is a general partner, limited partner, director, member, manager, or general manager, are also exempt. All agreements necessary for the construction and operation of such low-income rental housing must have been executed on or before June 30, 2017. All properties where agreements were executed on or before the June 30, 2017 deadline remain exempt, however, properties that did not meet the deadline do not receive the exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 4041 (2012), “the purpose of this tax expenditure is to extend property tax benefits to Indian tribal governments for providing government services equivalent to those provided by other governmental entities. Additionally, the expenditure encourages the provision of housing to low-income individuals while achieving consistency in the administration of property tax exemptions.”

WHO BENEFITS

Eligible tribal nations with property used for government services.

EVALUATION

Not evaluated.

2.083 FEDERALLY LEASED HIGH-VOLTAGE ELECTRICITY TRANSMISSION PROPERTY

Oregon Statute: 307.040(3)

Sunset Date: None

Year Enacted: 2013

2023-24 Estimated Reduction in the Taxable Assessed Value: \$85 million

	Revenue Impact	
	Loss	Shift
2023-25	\$2,000,000	\$500,000
2025-27	\$2,100,000	\$600,000

DESCRIPTION

In general, property that is owned by a non-governmental entity is taxable, even if it is leased to the United States. This provision ensures that property that is leased to the United States under a lease or lease-purchase agreement from a non-governmental entity is exempt from property tax if:

- The property is operated or used in furtherance of a statutory responsibility of the United States with respect to a high-voltage electricity transmission system that the United States owns and operates within the Pacific Northwest.
- The property is constructed on or affixed to real property interests of the United States and,
- Upon expiration of the lease or lease-purchase agreement, the United States has an option to purchase the property for a nominal price, if the debt incurred by the entity to acquire the property has been paid.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 261 (2013), “The purpose of this tax expenditure is to treat leased property as property of the United States government if it is used for electricity transmission by a federal agency. The purpose is also to expand energy transmission in Oregon.”

WHO BENEFITS

Third parties that finance equipment and facilities for the Bonneville Power Administration (BPA), as they would not be required to pay property tax on the equipment and facilities they own. This would ultimately reduce the cost for the BPA, as their lease payments would be reduced.

EVALUATION

Provided by the Oregon Public Utility Commission

This provision could be effective in achieving its purpose, but an in-depth evaluation of the program is not possible because the third parties that finance equipment and facilities for Bonneville Power Administration are not necessarily regulated by the Public Utility Commission. The Public Utility Commission does not have any financial or other information about these companies.

However, in general tax costs incurred by a utility are allowed into rates within limits. Therefore, an increase in taxes that the utility is obligated to pay could result in a rate increase for its customers. Conversely, a tax cost that is avoided by the utility could represent a savings for customers.

2.084 SOLAR IMPROVEMENT ON TRIBAL LAND

Oregon Statute: 307.181(2)(c)

Sunset Date: None

Year Enacted: 2024 (SB 1526)

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

Revenue Impact		
	Loss	Shift
2023-25	\$0	\$0
2025-27	\$6,100,000	\$900,000

DESCRIPTION

The first solar energy system that would otherwise be centrally assessed that is completed after June 6, 2024 is exempt from taxation provided that it is:

- located on land within Jefferson and Wasco Counties owned by the United States and held in trust for a federally recognized Indian tribe
- subject to a property tax imposed by a federally recognized Indian tribe in Oregon

The legislation that enacted this tax expenditure, SB 1526 (2024), specified that any sunset under ORS 315.037 does not apply.

PURPOSE

The statute that allows this tax expenditure does not explicitly state a purpose. The legislative staff revenue impact statement for SB 1526 (2024) states "the policy purpose of this measure is to recognize[...] that Tribes largely have discretion over property taxation within Tribal boundaries."

WHO BENEFITS

The owners of the qualifying solar energy system.

EVALUATION

Not evaluated.

2.085 CHARITABLE, LITERARY, AND SCIENTIFIC ORGANIZATIONS

Oregon Statute: 307.130

Sunset Date: None (The low-income housing exemption sunsets 06-30-2028.)

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$9.6 billion

Revenue Impact		
	Loss	Shift
2023-25	\$281,000,000	\$63,900,000
2025-27	\$306,000,000	\$69,800,000

DESCRIPTION

Property owned or being purchased by literary, benevolent, and charitable organizations or scientific institutions is exempt from property taxation. To qualify, the organization or institution must:

- Be a nonprofit corporation
- Provide a charitable service to the public without expectation of payment
- Occupy and use the property in a manner that furthers the organization's charitable purpose.

The organization or institution must file an application with the county assessor to claim the exemption (ORS 307.162). Shelter workshops and retail stores selling donated or consigned goods to support a welfare program or not-for-profit housing program are exempt from property taxation. Parking lots are also covered by the exemption as long as there is no charge for at least 355 days each year.

Real and personal property of retail stores owned by nonprofit entities is exempt from property taxation if the retail stores deal exclusively in donated inventory and the proceeds from the stores' sales are used to financially support a not-for-profit housing program.

Real and personal property of a retail store owned by a nonprofit corporation is exempt from property taxation if the store deals exclusively in donated inventory, operates with substantial support from volunteers, and all net proceeds of the retail store sales are donated to one or more of the following:

- A nonprofit corporation that provides animal rescue services
- A manufacturer or provider of goods or services in return for an equivalent value of goods or services from the manufacturer or provider
- To an entity that provides spaying and neutering services for pets of individuals residing in households with an annual household income at or below 80 percent of the area median income
- For the purpose of aiding domesticated animals, regardless of whether the animals are in the custody of the county shelter, in furtherance of the purpose for which the nonprofit corporation was organized.

Real or personal property of a nonprofit corporation that was offered, occupied, or used as low-income housing and granted exemption by the county as of the property tax year beginning July 1, 2012 is exempt from property taxation. Legislation in 2021 (HB 2446) extended the sunset of the low-income housing part of the exemption to June 30, 2028.

Over the years, legislation expanded and clarified the exemption, addressing retail stores (HB 3537, 2007; HB 3459, 2017), and low-income housing (HB 4039, 2014).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to recognize the social benefits of some nonprofit organizations.

WHO BENEFITS

This exemption applies to many nonprofit organizations. Examples are some hospitals, social service organizations, museums, youth and athletic groups, summer camps, and conservation groups. In tax year 2023-24, approximately 7,400 property tax accounts in 29 counties were exempt, but the number of organizations is unknown because the same organization may have property in more than one county.

EVALUATION

Not evaluated.

2.086 FRATERNAL ORGANIZATIONS

Oregon Statute: 307.136

Sunset Date: None

Year Enacted: 1961

2023-24 Estimated Reduction in the Taxable Assessed Value: \$690 million

	Revenue Impact	
	Loss	Shift
2023-25	\$18,500,000	\$2,700,000
2025-27	\$22,000,000	\$3,200,000

DESCRIPTION

Property used for fraternal or lodge work, entertainment, or recreational purposes by a fraternal organization (as defined in ORS 307.134) is exempt from property taxation. Fraternal organization property remains exempt even while being rented or leased to other persons so long as the rent does not exceed expenses for heat, lights, water, janitorial services, and supplies. Parking lots are exempt as long as there is no charge for at least 355 days each year. The fraternal organization must file an application with the county assessor to claim the exemption.

To qualify, a fraternal organization must:

- Be organized as a nonprofit
- Regularly provide financial support for a charitable activity with the purpose of doing good to others rather than for the convenience of its members
- Be established under the lodge system with ritualistic form of work and representative form of government
- Not distribute any income to its officers, members, or employees except for reasonable compensation for services
- Not be a college fraternity or sorority.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to recognize the social benefits of fraternal organizations.

WHO BENEFITS

In tax year 2023-24, approximately 1,100 property tax accounts were exempt. Qualifying organizations may include the State Grange, American Legion, Veterans of Foreign Wars, Eagles, Elks, Masons, Moose, Odd Fellows, Knights of Pythias, Knights of Columbus, Lions Clubs, Soroptimists, Rotary, and Kiwanis.

EVALUATION

Not evaluated.

2.087 RELIGIOUS ORGANIZATIONS

Oregon Statute: 307.140

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$5.3 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$152,000,000	\$33,900,000
2025-27	\$165,000,000	\$36,900,000

DESCRIPTION

Houses of public worship and other buildings or property used solely for administration, education, literary, benevolent, charitable, entertainment and recreational purposes by religious organizations, and cemeteries are exempt from property tax. Parking lots are exempt as long as there is no charge for at least 355 days each tax year. The religious organization must file an application with the county assessor to claim the exemption.

Legislation in 2021 (HB 2008) permitted religious organizations to file applications without paying a filing fee.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to recognize the social benefits of religious organizations.

WHO BENEFITS

In tax year 2023-24, counties reported that nearly 7,700 property tax accounts were exempt.

EVALUATION

Not evaluated.

2.088 CEMETERIES, BURIAL GROUNDS, AND MAUSOLEUMS

Oregon Statute: 307.150

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$230 million

	Revenue Impact	
	Loss	Shift
2023-25	\$6,700,000	\$1,600,000
2025-27	\$6,900,000	\$1,600,000

DESCRIPTION

Burial grounds, tombs and rights of burial, and lands and buildings on the land, not exceeding 30 acres, used for the sole purpose of a crematory or alternative disposition facility and for burial of incinerated or reduced human remains are exempt from property taxation. Lands used exclusively for cemetery purposes, not exceeding 600 acres, are exempt. Buildings to store maintenance equipment are included in the exemption. To qualify, a claim must be filed with the county assessor.

This statute exempts both nonprofit and for-profit cemetery and crematory associations, as well as family burial grounds. The property tax exemption for cemeteries and crematory properties is granted regardless of the organizational structure or state in which an association is organized.

Cemeteries owned by cities, counties, or cemetery districts are exempt by tax expenditure [2.078, State and Local Property](#). Cemeteries owned and maintained by religious organizations are exempt by tax expenditure [2.087, Religious Organizations](#).

Legislation in 2021 (HB 2574) broadened the exemption, operative beginning on July 1, 2022, to include lands used for the purpose of alternative disposition facilities and for burial of reduced remains.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is implementation of traditional public policy to not tax cemeteries.

WHO BENEFITS

In tax year 2023-24, about 1,120 properties were exempt. About a third of the exempt value is located in Multnomah County.

EVALUATION

Not evaluated.

2.089 CITY OWNED SPORTS FACILITY

Oregon Statute: 307.171

Sunset Date: None

Year Enacted: 2001

2023-24 Estimated Reduction in the Taxable Assessed Value: \$85 million

	Revenue Impact	
	Loss	Shift
2023-25	\$3,500,000	\$700,000
2025-27	\$3,800,000	\$800,000

DESCRIPTION

In general, when public property is held under contract of sale or is leased to a private individual or business, it is considered taxable. However, this provision exempts any sports facility owned by a city with a population of at least 500,000 from taxation, even if leased to or operated by a taxable entity. Portland is the only city in Oregon with a population that qualifies.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage the use of the specific qualifying facility as a private sports venue.

WHO BENEFITS

The only facilities in Portland currently affected by this statute are Providence Park and the Veterans Memorial Coliseum. As of the writing of this report, the City of Portland has approved the purchase of the Moda Center but the purchase is not yet complete. It is expected that the Moda Center will also qualify for this exemption.

EVALUATION

Not evaluated.

2.090 EXEMPT LEASE FROM TAXABLE OWNER

Oregon Statute: 307.112

Sunset Date: None

Year Enacted: 1977

2023-24 Estimated Reduction in the Taxable Assessed Value: *

	Revenue Impact	
	Loss	Shift
2023-25	*	*
2025-27	*	*

* Included in property tax exemption expenditures listed below.

DESCRIPTION

Property that is held under lease, sublease, or lease-purchase agreement by an entity that qualifies for a property tax exemption (under ORS Chapter 307) is exempt from property taxation. Eligible entities are institutions, organizations, and public bodies (other than the State of Oregon or an Oregon public university). The property must be used for a qualifying purpose, and the county assessor must be satisfied that the tax savings resulting from the exemption will inure solely to the benefit of the lessee. The lessee must file an application with the county assessor to receive this exemption.

Leased properties that qualify for this exemption are reported under one of the following expenditures:

- [2.001, Academies, Day Care, and Student Housing](#)
- [2.007, Senior Services Centers](#)

- 2.078, State and Local Property
- 2.082, Property Used Exclusively for Tribal Government Services
- 2.085, Charitable, Literary, and Scientific Organizations
- 2.086, Fraternal Organizations
- 2.087, Religious Organizations

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to extend equal treatment to exempt organizations whether they rent, lease, or sublease property.

WHO BENEFITS

Exempt organizations and local governments.

EVALUATION

Not evaluated.

2.091 EXEMPT LEASE FROM EXEMPT OWNER

Oregon Statute: 307.166

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: *

	Revenue Impact	
	Loss	Shift
2023-25	*	*
2025-27	*	*

* Included in other ORS Chapter 307 property exemption tax expenditures.

DESCRIPTION

Property that is leased or rented to an entity that qualifies for a property tax exemption (under ORS Chapter 307) from an owner who also qualifies for an exemption is exempt from property tax. Eligible entities are institutions, organizations, and public bodies. The property must be used for a qualifying purpose and the tax savings resulting from the exemption must inure solely to the benefit of the lessee. The lessee must file an application with the county assessor to claim the exemption, or a federal, state, or local government leasing property to another governmental entity only needs to provide the assessor with basic information about the nature of the lease and the exempt entities.

Leased properties that qualify for this exemption may be reported under one of the following expenditures:

- 2.001, Academies, Day Care, and Student Housing
- 2.007, Senior Services Centers
- 2.078, State and Local Property
- 2.085, Charitable, Literary, and Scientific Organizations
- 2.086, Fraternal Organizations
- 2.087, Religious Organizations
- 2.093, Federal Property

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to extend equal treatment to exempt organizations whether they rent, lease, or sublease property.

WHO BENEFITS

Exempt organizations and governments.

EVALUATION

Not evaluated.

2.092 PROPERTY OF LLC OWNED BY NONPROFIT CORPORATION

Oregon Statute: 307.022

Sunset Date: None

Year Enacted: 2005

2023-24 Estimated Reduction in the Taxable Assessed Value: *

Revenue Impact		
	Loss	Shift
2023-25	*	*
2025-27	*	*

* Included in other ORS Chapter 307 property exemption tax expenditures.

DESCRIPTION

A Limited Liability Company (LLC) that is wholly owned by a nonprofit corporation qualifies for a special assessment or property tax exemption if the nonprofit corporation would qualify. The LLC's property qualifies for special assessment or exemption if it is exclusively using the property consistent with the nonprofit corporation's purposes.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to allow nonprofit owners of property to structure their property ownership in a way that provides the limited liability protection of an LLC while still providing the owner a property tax benefit.

WHO BENEFITS

Nonprofit corporations that would qualify for a property tax exemption or special assessment that own property through wholly owned LLCs.

EVALUATION

Not evaluated.

2.093 FEDERAL PROPERTY

Oregon Statute: 307.040

Sunset Date: None

Year Enacted: 1854

2023-24 Estimated Reduction in the Taxable Assessed Value: \$39 billion

Revenue Impact		
	Loss	Shift
2023-25	\$1,120,000,000	\$250,000,000
2025-27	\$1,170,000,000	\$260,000,000

DESCRIPTION

Property of the United States and its agencies is exempt from property tax when taxation is prohibited by federal law. Federal property held under contract of sale or lease by a private party is generally taxable.

The Oregon Legislature exempted some leasehold interests of federal land that otherwise would be taxable.

The revenue impact for this tax expenditure includes the impact of [2.039, Leased Federal Grazing Land](#).

Revenue impacts from the following tax expenditures are not included in the estimate for this tax expenditure to avoid duplication.

- [2.021, Federal Land Under Summer Homes](#)
- [2.022, Federal Land Under Recreation Facility](#)
- [2.054, Federal Standing Timber Under Contract](#)
- [2.061, Mining Claims on Federal Land](#)

PURPOSE

To comply with federal law.

WHO BENEFITS

The United States government owns about 32 million acres in Oregon, or 53 percent of the land.

IN LIEU

The federal government makes payments in lieu of property taxes to local governments for certain types of federal land, for example:

- Federal forest land
- Land subject to the Payments in Lieu of Taxes Act of 1976
- Coos Bay Wagon Road lands
- Public land resource sales
- Bureau of Land Management grazing lands
- U.S. mineral leases

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

2.094 AMTRAK PASSENGER RAILROAD

Oregon Statute: 308.515(3)(d)

Sunset Date: None

Year Enacted: 1983

2023-24 Estimated Reduction in the Taxable Assessed Value: \$140 million

	Revenue Impact	
	Loss	Shift
2023-25	\$4,100,000	\$900,000
2025-27	\$4,200,000	\$900,000

DESCRIPTION

National Railroad Passenger Corporation (Amtrak) property is exempt from property tax. Federal law (49 U.S.C. § 24301(k)) exempts the company from paying state or local taxes on personal property and most real property. Amtrak does not own land or structures in Oregon but leases or pays fees for use. If taxed, the value would likely be computed using an allocation formula based on share of passenger miles traveled in Oregon.

PURPOSE

To comply with federal law.

WHO BENEFITS

Amtrak benefits by not paying property taxes.

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

2.095 FRATERNITIES, SORORITIES, AND COOPERATIVES

Oregon Statute: 307.471

Sunset Date: None

Year Enacted: 1973

2023-24 Estimated Reduction in the Taxable Assessed Value: \$15 million

	Revenue Impact	
	Loss	Shift
2023-25	\$200,000	Less than \$100,000
2025-27	\$200,000	Less than \$100,000

DESCRIPTION

Certain property owned by a qualified nonprofit corporation, such as a fraternity, sorority, or cooperative housing organization, is exempt from property taxes imposed by schools, educational service districts, and community colleges. The property must be rented exclusively to students who attend an accredited educational institution which offers at least a two-year program acceptable for full credit toward a baccalaureate degree, and student occupancy must be nondiscriminatory with regard to race, creed, color, and national origin.

An application to the county assessor is required to claim the exemption. If an exempt property loses qualified status, the owner is required to notify the assessor. If notification is not provided and the property is disqualified, additional taxes equal to the tax benefit of the exemption for all exempted prior years plus interest and a 20 percent penalty on the tax amount shall be assessed. Tax expenditure [2.003, Leased Student Housing Publicly Owned](#), covers similar property owned by a public college.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to help keep college housing costs to a minimum and provide equitable treatment with those students living on campus in publicly-owned residence halls.

WHO BENEFITS

In fiscal year 2023–24, approximately 60 accounts were exempt and located primarily in Benton and Lane counties.

EVALUATION

Provided by the Higher Education Coordinating Commission

This tax expenditure achieves its purpose and contributes to containing the costs of higher education. Housing is typically one of the highest sources of financial burden for postsecondary students, many of whom cannot afford the cost of their education even with expected financial resources. Fraternities, sororities, and cooperatives are not-for-profit organizations that primarily or exclusively serve students. They are also important and traditional components in the housing supply for colleges and universities. These organizations provide the second largest option for campus student housing (residence halls are the first). Consequently, this exemption is valuable in supporting higher education. It is a fiscally effective means of achieving its purpose.

2.096 NEW RURAL HEALTH CARE FACILITIES

Oregon Statute: 307.804(2)

Sunset Date: None

Year Enacted: 2001

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Real and personal property of a rural health care facility may be exempt from property taxation if the property constitutes new construction, new additions, new modifications, or new installations of property as of the first assessment date for which the facility is in service. Land and other existing property are not exempt.

The exemption lasts three years, but the taxpayer must file its intention to take the exemption each year. The exemption is available only in a county where the county governing body has passed a resolution authorizing the exemption and then only from the taxes of taxing districts that elect to participate by also passing a resolution or ordinance.

A rural health care facility is one that is located in a rural health service area with an average travel time of more than 30 minutes from a population center of 30,000 or more, as determined by the Office of Rural Health, and is used exclusively to provide medical care.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to promote health care in rural areas.

WHO BENEFITS

No taxpayers received this exemption in 2023-24.

EVALUATION

Not evaluated.

2.097 LONG TERM CARE FACILITIES

Oregon Statute: 307.811

Sunset Date: None

Year Enacted: 1999

2023-24 Estimated Reduction in the Taxable Assessed Value: \$7.3 million

	Revenue Impact	
	Loss	Shift
2023-25	\$200,000	Less than \$100,000
2025-27	\$200,000	Less than \$100,000

DESCRIPTION

A property tax exemption is allowed for real and personal property that is used solely in the operation of a long term care facility that has been certified for the tax year as an essential community provider long term care facility. Qualifying long term care facilities are nursing facilities, assisted living facilities, residential care facilities, and adult foster homes. The owner of the facility must file with the county assessor a copy of a certificate issued by the Aging and People with Disabilities Division of the Oregon Department of Human Services. Adult foster homes must have an average residency rate of at least 60 percent of residents eligible for Medicaid, whereas all other qualifying facilities must have a residency rate of 50 percent (ORS 443.888). The facility will only receive a property tax exemption from those taxing districts granting the exemption.

PURPOSE

The statutory policy is to recognize that "...owners of long term care facilities that devote substantial proportions of those facilities to providing long term care to residents eligible for medical services under Medicaid provide an essential community service. The Legislative Assembly declares that a property tax exemption will enable these essential community provider long term care facilities to increase the quality of care provided to facility residents." (ORS 307.808)

WHO BENEFITS

In tax year 2023-24, counties reported that six property tax accounts received this exemption.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This exemption is helpful to the few facilities that have applied. However, utilization is low likely due to the low number of facilities that serve more than 50% Medicaid consumers. It is also likely that smaller programs are unaware that the exemption is available. Additionally, the language excludes facilities serving individuals with intellectual or developmental disabilities licensed by ODHS, Office of Developmental Disabilities Services and facilities serving individuals with behavioral health needs licensed by the Oregon Health Authority.

2.098 FACILITIES WITH PREPAYMENT AGREEMENT

Oregon Statute: 311.865

Sunset Date: None

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.4 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Certain facilities that have pre-paid property taxes while under construction are partially exempt from property tax for a period of years upon completion of the construction of the facility. To qualify for this exemption, a facility must be a thermal power plant, a hydroelectric power project or any building or improvement that is suitable for use for industrial, commercial, or warehousing purposes.

To qualify there must be an agreement between the taxing unit/local government and the property owner which specifies some restrictions, such as that the exemption should not exceed 10 years from the date of the completion of the construction of the facility.

PURPOSE

“...to provide a method for prepaying ad valorem property taxes during the period of planning and construction of the facility, in order that units of local government may provide the services, buildings or other resources necessitated without imposing an undue burden upon other properties subject to taxation within the unit, and to provide for repayment of the amounts prepaid” (ORS 311.850).

WHO BENEFITS

Facilities that previously pre-paid property taxes under one of these specified agreements. In tax year 2023-24 only one county reported using this exemption: Clackamas County reported 11 exempt accounts.

IN LIEU

Facilities under construction enter an agreement to pre-pay property taxes for the facility that is under planning and construction to local government. The amounts pre-paid are considered a budget source for local governments. The amounts pre-paid are the basis for the amounts that are exempt under this provision.

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure can serve to facilitate eligible developments, for which obstacles arise in relation to special costs for local public services affected by or required during construction or related activities. The pre-paid amounts would offset these impacts on local governments allowing construction to proceed. Later, when the new facility’s real market value is reduced for up to 10 years, a tax expenditure is in effect. The taxpayer’s savings, however, are not to exceed the amount previously paid to local governments plus interest, so that over time, there is not necessarily a net loss of public revenues. Though certain local taxing districts, which are not much affected by construction and do not receive prepayments, might experience a net loss.

2.099 CERTAIN COMMUNICATION RELATED PROPERTY

Oregon Statute: 308.671

Sunset Date: None

Year Enacted: 2001

2023-24 Estimated Reduction in the Taxable Assessed Value: \$2.2 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$63,000,000	\$14,000,000
2025-27	\$67,800,000	\$15,100,000

DESCRIPTION

A communication company may choose one of the following types of property to be exempt from property taxation:

- Licenses granted by the Federal Communication Commission.
- If the company is in the business of communication, franchises.
- Satellites that are used by the company to provide communication services directly to retail customers or that are being constructed for such use and Federal Communications Commission licenses related to the use of the satellites to provide the communication services.

Legislation in 2015 (SB 611) added the exemptions for franchises and satellites.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 611 (2015), which modified this provision, “The policy purpose of this measure is to provide tax relief for centrally assessed companies, primarily those with high levels of intangible value and to create a tax environment that incentivizes investment by centrally assessed communication companies in Oregon.”

WHO BENEFITS

Communication companies that have FCC licenses, franchises, or satellites. In fiscal year 2023-24, 34 companies received this exemption. Twenty-three of these companies received the exemption on their FCC licenses, and the remaining 11 received the exemption on their franchises or their satellites.

EVALUATION

Provided by the Oregon Public Utility Commission

The statute appears to provide tax relief for centrally assessed communications companies and creates a tax environment more friendly towards centrally assessed communication companies in Oregon. However, the PUC does not have information on which companies have received tax relief under this option. Presumably, this option would remove one potential barrier for national, regional, or Oregon-only telecommunications companies looking to invest in Oregon. This may provide benefits to new market entrants who could provide alternatives to legacy telecommunications service and infrastructure. Expanding upon the exemption might incentivize existing or new market entrants making investments to replace aging infrastructure capable of providing modern telecommunications services. Not all of the potential market entrants have FCC licenses or franchises from Oregon public bodies. Such an expansion could be time-limited to encourage faster facility build out.

2.100 STRATEGIC INVESTMENT PROGRAM

Oregon Statute: 307.123

Sunset Date: None

Year Enacted: 1993

2023-24 Estimated Reduction in the Taxable Assessed Value: \$24 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$681,000,000	\$131,000,000
2025-27	\$654,000,000	\$124,000,000

DESCRIPTION

This expenditure (abbreviated as SIP) allows for part of a new business project with a large capital investment to be exempt from property taxes over a 15-year period. The property tax exemption is on the amount of the eligible project's real market value that exceeds a certain threshold amount. The project's real market value up to the threshold amount is fully taxable at that property's assessed value. This taxable portion's threshold increases 3 percent each year during the 15-year exemption period.

For SIP projects in urban areas, the initial taxable amount is \$100 million, which is indexed for price inflation in 2026 and later under House Bill 2009 in 2023. So, for example, a new project with a total investment cost of \$175 million, \$75 million would be exempt from property taxation and \$100 million would be fully taxable in the first year of the exemption.

For SIP projects in rural areas, if the total investment cost is less than or equal to \$500 million, the taxable amount is initially \$40 million. If the total investment cost is more than \$500 million but not more than \$1 billion, then the taxable portion is \$75 million. If the cost is more than \$1 billion, then the taxable portion is \$150 million. These threshold amounts for rural areas reflect increases by HB 2009, but they are not inflation-indexed going forward. A rural area is defined here as an area located outside current urban growth boundaries (UGBs) surrounding any city of 40,000 or more in population.

The new investment must be in a traded-sector industry—i.e., sells goods or services in markets with national or international competition, including but not limited to manufacturing. The business making the investment and operating the project needs to conduct a job fair (added by HB 2009) and to enter into a first source hiring agreement with local publicly funded job training providers.

Approval of a SIP project requires a county public hearing, written agreement between the business and the county—and the city if locating inside city limits and, under HB 2009, the port if anywhere inside the port district—and finally, formal action (vote) by the county governing body. The Oregon Business Development Commission (OBDC) makes a final determination of project eligibility for it to receive SIP tax treatment, including that investment costs will be at least \$40 million in a rural area or \$150 million, if urban, as increased from \$25 and \$100 million, and to be adjusted for price inflation after 2025, under HB 2009.

In applying to the state for this exemption, businesses must pay fees equal to \$10,000 (\$5,000 in rural areas). An additional \$50,000 (\$10,000 in rural areas) is due with the OBDC's determination of eligibility, from which the Department of Revenue receives 50 percent for administrative purposes. The remaining funds are deposited in the Oregon Business, Innovation and Trade Fund.

A business using this property tax exemption must also pay the county an annual fee in support of community services (see In Lieu below), in addition to other requirements under the agreement with the county (and any applicable city/port) which typically prescribes further payments to local governments. In 2017, the Legislature (SB 936, 2017) not only increased the taxable portion of property for rural projects of \$0.5 billion or more (see above), but the yearly cap on community service fees was also raised from \$500,000 and \$2 million in rural and urban areas, respectively, to \$2.5 million for any new project. For future projects, HB 2009 increased the fee's maximum to \$3 million annually as indexed to price inflation starting in 2025 (including during the exemption period).

Starting in 2011, the 2007 Legislature provided for local "gain share" of annual personal income tax revenue from state tax collections attributable to new and retained employment at SIP projects first exempt in or after 2008. A percentage

of the estimated amount of state revenue is transferred to the county for local distribution under the same formula as the community service fee (see In Lieu below). In 2015, the Legislature (SB 129):

- Extended gain-share provisions through 2024. (SB 1524 (2023) extended this date an extra year to 2025, which HB 2009 extended until 2030).
- Capped the total that any one county could receive at \$16 million per year (currently affecting only Washington County).

Reduced from 50 percent to 20 percent, the portion of estimated tax revenue from retained jobs subject to transfer (still 50 percent for new-job revenue).

PURPOSE

“...to improve employment in areas where eligible projects are to be located and [the Legislative Assembly] urges business firms that will benefit from an eligible project to hire employees from the region in which the eligible project is to be located whenever practicable” (ORS 285C.603).

WHO BENEFITS

By tax year 2023–24, 20 SIP projects were receiving this property tax exemption, 8 of which will complete their exemption during the 2023–2025 biennium; 10 others had been formerly exempt. The Intel Corporation is the program’s only urban user at present and has dominated program activity with large investments in high-technology semiconductor commercialization and fabrication in Hillsboro and Aloha since 1994, in addition to data centers, wood/paper-related products, and power generation (mostly wind) in rural areas. Over the next four years, 11 approved projects are expected to begin exemptions.

IN LIEU

Businesses that have exempt property value under SIP pay a community service fee each year equal to 25 percent of the property taxes that would have otherwise been imposed. In 2023, businesses in the Strategic Investment Program paid \$10.2 million in statutory community services fees in addition to more than \$111 million in other locally negotiated payments primarily made to county governments, as well as \$19 million in property taxes on the taxable portion of SIP projects. Community service fees are generally divided up among the county, city (if any), and (non-school) taxing districts in the project’s property tax code area under a special intergovernmental agreement or otherwise by OBDC action.

EVALUATION

Provided by the Oregon Business Development Department

The program appears to achieve its purposes by giving local governments an option in pursuing well-structured arrangements for extraordinarily large, highly capital-intensive investments, such that companies are paying more reasonable taxes relative to direct public service impacts in communities that particularly value those companies’ construction spending, employment impacts, negotiated concessions, franchise taxes and other benefits. As such, local officials have thoughtfully approved 41 SIP projects.

Anecdotal evidence, at least, suggests that these mutually beneficial arrangements have been crucial for attracting and maintaining exceptionally large investments and associated operations in Oregon. OBDD does not have sufficient data to determine that participating businesses do not simply realize lower taxes on property that might have existed any way, or that local/regional economies are sustainably better off than they would otherwise be.

The 2003 Legislature may not have expected the lower threshold for rural projects to be a panacea for all of Oregon’s struggling rural economies (business investments even approaching the former rural threshold \$25 million are still rather unusual). Nevertheless, that policy change has had an impact with operating projects in Clackamas, Clatsop, Columbia, Gilliam, Lincoln, Morrow, Sherman and Umatilla counties, as well as recently approved projects in Coos, Douglas, Klamath, Lake, Wasco and Yamhill counties. Many rural projects comprise major energy investments, for which parts of Oregon offer distinct advantages, even if some amount of negotiated property tax relief might have still been critical relative to other locations. The number of other of industries involved in the program statewide has been expanding, especially lumber manufacturing.

In 2022–23, businesses in the program enjoyed net savings of \$280.5 million in property taxes, before subtracting \$121.8 million of nontax fees or other payments under local SIP agreements, so that the net revenue foregone by local governments (after also adjusting for levy shifts and typical tax payment discounts by county) was approximately \$168.9 million.

The taxable portions of these SIP projects generated as much as \$19 million in property taxes, aside from the taxes on former project property, other property of these businesses, and the property of their suppliers, contractors and so forth. Also, worth considering might be how these amounts compare to the taxes levied on commercial or other developments relative to demands on public services.

With respect to outcomes, as reported under the gain-share provisions discussed above, there are 15,040 full-time equivalent jobs created or retained directly with these current projects (overwhelmingly at Intel) with average annual incomes of about \$181,894. These payrolls generated an estimated \$125 million in state personal income taxes in 2023, of which \$17.5 million was paid out by the state in gain-share distributions to county governments. Gain-share funds are distributed consistent with business’s community service fees among cities and special service districts.

2.101 CAP ON CENTRAL ASSESSMENT FOR CERTAIN COMPANIES

Oregon Statute: 308.674

Sunset Date: 06-30-2030

Year Enacted: 2015

2023-24 Estimated Reduction in the Taxable Assessed Value: \$140 million

	Revenue Impact	
	Loss	Shift
2023-25	\$4,000,000	\$900,000
2025-27	\$4,400,000	\$1,000,000

DESCRIPTION

A company that is centrally assessed (under ORS 308.515(1)) will receive an exemption on any value above 130 percent of the historical or original cost of the company’s real property and tangible personal property included in the unit subject to central assessment. The exemption is calculated so as to not double count any exemption elected under [2.099, Certain Communication Related Property](#). In addition, the amount of this exemption may not exceed an amount equal to 95 percent of the real market value of the company’s real property and tangible and intangible personal property included in the unit subject to central assessment.

The property of a company that is granted this exemption for a property tax year is not eligible to receive any other property tax exemption except as provided by [2.099, Certain Communication Related Property](#). In addition, a company’s status as having been granted this exemption for a property tax year has no effect on the benefits that the property of the company or the company may be granted under Chapter 285C (Enterprise Zone tax expenditures) or [2.100, Strategic Investment Program](#) for the property tax year.

Legislation in 2023 (HB 2080) extended the sunset to June 30, 2030.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2080 (2023), “the policy purpose of this measure is to provide tax relief for centrally assessed companies, primarily those with high levels of intangible value and to create a tax environment that incentivizes investment by centrally assessed communication companies in Oregon.”

WHO BENEFITS

In fiscal year 2023-24, 60 companies received this exemption. The assessed value of property exempted for these companies was \$140 million.

EVALUATION

Provided by the Oregon Business Development Department

This tax expenditure should improve the competitiveness of telecommunication investments in Oregon in comparison to the alternative of fully applying unitary methods of valuation that incorporate the intangible assets of nationwide telecommunication companies in assessing taxable value. The relative size of such assets might be extraordinarily high for such businesses, and other states do not appear to commonly employ methods that effectively tax most such intangible value of the telecommunication industry. The department, however, lacks the data or direct experience to address this expenditure further.

2.102 VERTICAL HOUSING DEVELOPMENT ZONE

Oregon Statute: 307.864

Sunset Date: 12-31-2025 (for new certifications)

Year Enacted: 2001

2023-24 Estimated Reduction in the Taxable Assessed Value: \$390 million

	Revenue Impact	
	Loss	Shift
2023-25	\$11,800,000	\$2,700,000
2025-27	\$12,900,000	\$2,900,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A partial property tax exemption is available for 10 consecutive years for qualified residential housing combined with nonresidential uses in a vertical housing development zone. Vertical housing development zones are designated by a city or county, but the city or county must consider the potential impact of displacement on existing residents before designating the zone.

The qualified project must consist of a multiple story building or group of buildings, including at least one multiple story building containing nonresidential and residential space in any proportion. The partial property tax exemption depends on the portion of the property dedicated to residential housing. If any of the residential floors are converted to commercial space, the project may receive a reduced exemption or be disqualified.

A project may be new construction or a rehabilitation of an existing building. The land on which a project is located may be included in the partial exemption if the project restricts participation of at least a portion of the residential units to low-income persons or families, defined as having income 80 percent or less of area median income, adjusted for family size, as determined by the Oregon Housing and Community Services Department.

The taxpayer must apply with the city or county for the exemption but the vertical housing development project partial exemption does not apply to the taxes of any local taxing district or special district that elects not to participate.

Legislation in 2015 extended the sunset for new certifications through 2025, added a definition for “nonresidential use,” and allowed any local taxing districts to opt out of the exemption and thus tax these properties at their full assessed value. Legislation in 2017 removed Oregon Housing and Community Services Department from the process of designating and certifying a zone and added a requirement that cities and counties consider the potential for displacement on residents before designating a new zone.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage investment in and rehabilitation of properties in targeted areas of a city or community, to augment the availability of appropriate housing, and to revitalize communities.

WHO BENEFITS

Taxpayers of approved projects receive partial property tax exemptions. In tax year 2023-24, four counties reported that there were 23 accounts receiving this exemption.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. The program is relatively efficient to administer in comparison with other types of housing funding. The exemption offers an incentive to encourage the construction or rehabilitation of properties in targeted areas of communities in order to augment the availability of appropriate housing and to revitalize such communities.

Although it is assumed that the placement of these projects benefits the communities and an increased tax base, the program is not structured to get feedback from the communities to verify this.

2.103 CERTAIN SINGLE-UNIT HOUSING

Oregon Statute: 307.664

Sunset Date: 12-31-2029 (last day to approve applications)

Year Enacted: 1989

2023-24 Estimated Reduction in the Taxable Assessed Value: \$110 million

	Revenue Impact	
	Loss	Shift
2023-25	\$3,900,000	\$1,300,000
2025-27	\$4,200,000	\$1,400,000

DESCRIPTION

A city may grant a property tax exemption for up to 10 successive years for rehabilitated, newly constructed, or newly purchased single-unit housing. Condominiums and single-family homes can qualify for this exemption. A manufactured structure is eligible depending on the jurisdiction. Only the value of the dwelling is exempt; the land remains taxable.

Qualified dwelling unit has a market value for the land and improvements of no more than 120 percent, or a lesser percentage as adopted by the city or county by resolution, of the median sales price of dwelling units located within the city. Each dwelling unit is intended to be purchased and lived in by one person or one family.

Approved property is generally exempt only from city or county taxes. However, if local taxing districts representing at least 51 percent of the taxes on the property pass resolutions supporting the exemption, then the exemption applies to the taxes of all districts.

If a city has more than 40 percent of the total tax rate of all taxing districts with jurisdiction over the property, a county resolution or ordinance is required for the exemption to apply.

To qualify for the exemption, the property must meet certain criteria such as type of the property, value of the property, and, for new construction, the date it was constructed.

A change of use will disqualify the property from the program. Upon disqualification, an additional tax is generally due based on the number of years of exemption.

Legislation in 2017 (HB 2964) allows cities to extend the exemption to newly purchased or newly rehabilitated housing.

Legislation in 2023 (HB 2080) extends the sunset for cities to approve new applications to December 31, 2029.

Legislation in 2024 (HB 4063) allows a city to approve or terminate the exemption. Also, it requires a city to provide the county assessor with certain information about the approved application by the April 1 filing deadline for the tax exemption.

PURPOSE

“(1) The Legislative Assembly finds it to be in the public interest to encourage homeownership among low- and moderate-income families. (2) The Legislative Assembly further finds and declares that the cities of this state should be able to establish and design programs to stimulate the purchase, rehabilitation and construction of single-unit housing for homeownership by low- and moderate-income families by means of a limited property tax exemption, as provided under ORS 307.651 to 307.687.” (ORS 307.654)

WHO BENEFITS

Homeowners who qualify for the reduced taxes. Most of the exempted homes are in the Portland area.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. The program is relatively efficient to administer in comparison with other types of housing funding. There is no need to channel funding through different layers of government and minimal need to establish larger bureaucratic mechanisms to develop program guidelines or to review for program eligibility. The exemption is intended to provide an incentive for builders to build housing that they would not otherwise build by providing to the purchaser of a qualifying home a full property tax exemption on the building for 10 years. Whether any given home would or would not have been built without the benefit of the exemption is difficult to determine. The popularity of the program with builders suggests that the exemption functions well.

A major advantage of tax exemptions over a direct expenditure is the ability to tie the exemption to the specific project with little risk to the city. If the project is not constructed, the assistance is not tied up pending the fate of the project in the way a direct budgeted funding commitment would be. In other words, there is no lost opportunity of funds committed to a project that is not constructed; nor is there any lost revenue.

Additionally, the program provides an additional incentive that helps to design housing in ways consistent with local policy.

The program is available to both for profit and nonprofit housing developers. Local programs can be designed with a variety of monitoring and evaluative controls.

2.104 REHABILITATED HOUSING

Oregon Statute: 308.459

Sunset Date: 12-31-2016 (last day to complete rehabilitation)

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

A city or county could grant an exemption from property tax for any value that is attributed to the rehabilitation of housing or conversion of buildings for housing (single or multi-family) for up to 10 years. If the housing was at least 25 years old at the time of application, it may have qualified if it underwent rehabilitation on or after September 12, 1975, and before January 1, 2017. The rehabilitation must have cost at least 5 percent of the assessed value of the property before rehabilitation. Regardless of the age of the housing, it could have qualified if it underwent rehabilitations that cost at least 50 percent of the assessed value of the property before rehabilitation, and the rehabilitations were done after October 3, 1989, and before January 1, 2017. There was a procedure allowing for a 12-month extension of the deadline for completion of a rehabilitation. Applications for this partial exemption must have been filed with the city or county prior to January 1, 2015.

To receive the exemption, the property must have met several requirements. Before rehabilitation, it must have failed to comply with one or more standards of applicable building or housing codes. The property must have consisted of residential units, of which at least 50 percent were for nontransient occupants. If the property was owner-occupied, the property must have been in a distressed area as designated by the city or county. Finally, the property must have been approved for exemption by the city or county before rehabilitation.

The assessed value of exempt property was frozen for ten years at its assessed value before rehabilitation. However, if the owners of the property entered into a low-income rental assistance contract with a government agency during this

time, and if the contract expires after the ten-year period, the property value will remain frozen through the term of the contract.

Qualified property was generally exempt only from city or county taxes. However, if local taxing districts representing at least 51 percent of the taxes on the property passed resolutions supporting the exemption, then the exemption applied to the taxes of all districts.

PURPOSE

To “encourage the rehabilitation of existing units in substandard condition and the conversion of transient accommodation to permanent residential units and the conversion of nonresidential structures to permanent residential units in order to make these units sound additions to the housing stock of the state” (ORS 308.453).

WHO BENEFITS

Single or multi-family housing owners who rehabilitated their property. Counties reported that no taxpayers received this exemption in 2023-24.

EVALUATION

Not evaluated.

2.105 MULTI-UNIT RENTAL HOUSING IN DESIGNATED AREAS

Oregon Statute: 307.612

Sunset Date: 01-01-2032

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: \$610 million

	Revenue Impact	
	Loss	Shift
2023-25	\$21,100,000	\$6,300,000
2025-27	\$24,600,000	\$7,300,000

DESCRIPTION

A city or county may grant a property tax exemption for multiple unit rental housing (excluding land) in areas designated as core areas, light rail station areas, and transit-oriented areas for up to 10 successive years. Housing that can qualify for this exemption includes newly constructed housing and property converted to housing use.

Core, light rail station, and transit-oriented areas are locations designated by the city or county granting the property tax exemption. Cities may designate any of these types of areas, while counties may designate light rail station areas or transit-oriented areas, but not core areas.

Approved property is generally exempt only from city or county taxes. However, if local taxing districts representing at least 51 percent of the taxes on the property pass resolutions supporting the exemption, then the exemption applies to the taxes of all districts.

The exemption does not include the land or any improvements not part of the multiple unit housing with these exceptions:

- Parking constructed as part of the multiple unit housing construction, addition, or conversion
- Commercial property to the extent that the commercial property is a required design or public benefit element of a multiple-unit housing construction, addition, or conversion approved by an authorizing city or county
- In the case of a structure to which stories or other improvements are added or a structure that is converted in whole or in part from other use to dwelling units, the entire multiple-unit housing including the additions to the structure and converted structures may be exempt from taxation.

Any county over 300,000 in population, and any city, may include urban renewal land and land near the central business district within its eligible core area. Construction is to be completed by January 1, 2032, but an extension is possible.

Legislation in 2011 (SB 322) included commercial property as eligible for this exemption if the commercial property is a required design or public benefit element of a multiple-unit housing construction, addition or conversion approved by an authorizing city or county. Legislation in 2019 (SB 262) extended the last date for completion of construction to January 1, 2032. Legislation in 2023 (HB 2080) required the city or county to send notice of approval to the owner and provide the county assessor documents listing the owner, property details and approval conditions.

For additional provisions associated with this exemption see [2.106, Low Income Multi-Unit Rental Housing](#).

PURPOSE

To “stimulate the construction of rental housing in the core areas of Oregon’s urban centers to improve the balance between the residential and commercial nature of those areas...” and to have city programs emphasizing the “development of vacant or underused sites in the core areas...” with “rental rates accessible to a broad range of the general public” (ORS 307.600).

WHO BENEFITS

For tax year 2023–24, four counties reported 111 property tax accounts which benefited from this exemption or [2.106, Low Income Multi-Unit Rental Housing](#). Most are in Lane and Multnomah counties.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. This is a relatively older tax exemption program that offers a long track record to judge its success. The exemption offers an incentive for developers to construct or convert to rental housing developments they would not otherwise construct or convert in city downtown core areas. The burden of proof falls on the developers as to whether any given development would have been built without the benefit of the exemption. This point must be demonstrated through a series of public hearings. The exemption is popular, but the process for either seeking or receiving qualification for the exemption is expensive and time consuming.

The Portland Bureau of Housing ensures the exempted property provides such public benefits as: reduction of rents, a limited rate of return on investment to the developer and the subsequent owner of only 10–12 percent per year, and public art, landscaping, child care, or set-asides of land for public parks. Although developments need only 10 units or more to qualify for the exemption, the complexity of the process makes it impractical for all but large developments. Therefore, the exemption tends to exclude smaller projects and less sophisticated housing developers.

The exemption seems to perform a solid public purpose, but is subject to a locally designed approval process.

2.106 LOW INCOME MULTI-UNIT RENTAL HOUSING

Oregon Statute: 307.612

Sunset Date: 01-01-2032

Year Enacted: 1999

2023-24 Estimated Reduction in the Taxable Assessed Value: Included in [2.105, Multi-Unit Rental Housing in Designated Areas](#)

Revenue Impact		
	Loss	Shift
2023-25	Included in 2.105	Included in 2.105
2025-27	Included in 2.105	Included in 2.105

DESCRIPTION

This tax expenditure is related to tax expenditure [2.105](#). A city or county may exempt from property tax any building operated as low-income rental housing under a low-income assistance contract with the state or federal government. The duration of exemption may run no more than 10 successive years unless extended by the city or county to run

through the tax year in which the contract terminates. The property is not required to be in a core, light rail station, or transit-oriented area.

Qualified property is generally exempt only from city or county taxes. However, if local taxing districts representing at least 51 percent of the taxes on the property pass resolutions supporting the exemption, then the exemption applies to the taxes of all districts.

An exemption is allowed only when the city or county has designated an area in which exemptions may be granted and has approved the exemption application. The exemption may not include the land or any improvements not associated with the multi-unit housing but may include parking constructed as part of it or the commercial property that is a required design or public benefit element of a multiple-unit housing construction, addition or conversion approved by an authorizing city or county. To qualify for this exemption, applications must be received before January 1, 2032. Legislation in 2019 (SB 262) extended the date for applications.

Legislation in 2023 (HB 2080) expanded the property tax exemption for multiple-unit housing to include the entire multiple-unit housing, including the additions to the structure and converted structures, in the case of a structure to which stories or other improvements are added or a structure that is converted in whole or in part from other use to dwelling units.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to provide an incentive to maintain or expand the supply of affordable rental housing.

WHO BENEFITS

Owners of low income rental housing complexes; the properties exempt under this provision are included in the properties described in [2.105, Multi-Unit Rental Housing in Designated Areas](#).

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. The exemption encourages the development of affordable housing and essentially lowers the operational costs of the property helping offset the reduced revenue that occurs when entering into an affordability agreement. Affordable housing is a scarce resource and tenants of subsidized housing are of low income. These families would have very limited opportunities in finding replacement housing at the same affordable rent level without this program.

2.107 PROPERTY FOR LOW-INCOME RENTAL

Oregon Statute: 307.517 and 307.518

Sunset Date: 06-30-2030 (application deadline)

Year Enacted: 1989

2023-24 Estimated Reduction in the Taxable Assessed Value: \$140 million

	Revenue Impact	
	Loss	Shift
2023-25	\$4,500,000	\$700,000
2025-27	\$5,100,000	\$800,000

DESCRIPTION

Newly constructed rental housing occupied by low-income persons or property held for a period of time set by the city or county for future development as low-income rental housing is exempt from property taxes for 20 years if the property meets certain criteria such as the location, year it was built, renters' income, and the amount it is rented for.

The sunset date is June 30, 2030. Applications for exemption must be filed with the city or county by that date. The property must be owned by either a for-profit business or nonprofit 501(c)3 entity. In addition, low-income rental residences owned by a nonprofit public benefit or religious corporation could be exempt if they meet certain criteria.

Generally, exemption applies only to city or county property taxes. However, if districts representing at least 51 percent of the taxes on the property pass resolutions supporting the exemption, then the exemption applies to the property tax levies of all districts.

Legislation in 2015 (HB 2130) amended the law to allow cities or counties to establish reasonable maximum holding times for land designated for low-income housing development. The legislation also permitted cities or counties to elect additional qualifying criteria before granting the exemption.

Legislation in 2023 (HB 2080) expanded this low-income rental housing property tax exemption to include housing owned by limited equity cooperative corporations.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2130 (2019), “the policy purpose of this measure is to assist in providing housing equity throughout the state and reduce homelessness.”

WHO BENEFITS

For tax year 2023–24, five counties reported around 121 property tax accounts were exempt, most located within Lane County

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure is critical to the viability of many low-income housing developments; it achieves its stated purpose. The exemption reduces the operating expenses for the provider of low-income housing, thereby resulting in lower rents. Without this assistance in lowering rents, some Oregonians could not afford decent housing; in some cases, this housing would not be built.

Where a taxing jurisdiction has adopted the authorizing provisions, the process by which it grants the exemption is quite straightforward; if a development meets the criteria, it receives the benefit of the exemption. It is relatively easy to administer once in place.

The taxing entity typically requires an annual report of tenant income levels and the rental rates being charged in exempted developments. This helps ensure fulfillment of the requirement that the project rental rates reflect the full property tax reduction and prevents possible abuse of the exemption by developers or development owners.

After the 20-year exemption, the entire property comes onto the tax rolls at its full assessed value. Tenants, property owners, and local governments benefit in the long term.

Since Measure 50 took effect in 1997, property tax exemptions have caused actual revenue losses to local governments. Before Measure 50, exemptions did not decrease local tax revenues because other property tax payers paid at a higher tax rate to compensate. Despite the loss to local governments caused by Measure 50, local governments have elected to increase the exempted value significantly since Measure 50.

This exemption enables local governments to contribute to providing affordable housing in their communities without raising additional revenue and spending it on affordable housing. The administrative costs of this exemption are likely less than would be incurred through a direct program developed to achieve this objective. This exemption fits well with other direct and indirect spending programs for affordable housing assistance. The exemption is both fiscally effective and an efficient means of achieving its public goal.

2.108 NONPROFIT LOW-INCOME RENTAL HOUSING

Oregon Statute: 307.541

Sunset Date: 06-30-2027

Year Enacted: 1985

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.1 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$39,000,000	\$12,400,000
2025-27	\$45,400,000	\$14,500,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A city or county may exempt from property tax certain property owned or being purchased by a nonprofit corporation if the property is intended for the purpose of low-income housing. The property must currently be in use as housing or may be land being held for that purpose. Qualifying nonprofit corporations must be exempt from federal income tax and upon liquidation distribute remaining assets to other tax-exempt charitable organizations or the state of Oregon.

Approved property is generally exempt only from city or county taxes. However, if local taxing districts representing at least 51 percent of the taxes on the property pass resolutions supporting the exemption, then the exemption applies to the taxes of all districts.

When applying for the exemption, the nonprofit corporation must certify that the income level of each renter is at or below 60 percent of area median income which is determined by the State Housing Stability Council based on information from the U.S. Department of Housing and Urban Development. In addition, the nonprofit corporation must describe how the exemption will benefit project residents, and, for projects after October 5, 2015, must meet any additional criteria established by the city or county prior to the application.

Each year the nonprofit corporation must file an application with the appropriate city or county to claim the exemption. The exemption is only allowed for tax years beginning on or after January 1, 1985, and before July 1, 2027.

This expenditure is similar to [2.107, Property for Low-Income Rental](#). The qualifications are not identical, but for a nonprofit organization, it could be possible that it would qualify under either requirement.

Legislation in 2015 (HB 2130) amended the law to allow cities or counties to establish reasonable maximum holding times for land designated for low-income housing development and permits cities or counties to elect additional qualifying criteria before granting the exemption. HB 3082 in 2015 amended the law to allow alternative definitions of low-income, up to 80 percent of area median income, for the purpose of renewing an existing application.

Legislation in 2021 (HB 2456) allowed for a city or county to define “low income” using three different options that would potentially increase the income level of eligible tenants: a) at or below 60 percent of the area median income; b) at or below 60 percent of the area median income for the initial year and at or below 80 percent of the area median income for subsequent years; or c) for property awarded tax credits through the federal Low-Income Housing Tax Credit Program, at or below 80 percent of the area median income if the average of all units on the property is at or below 60 percent of the area median income.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage nonprofit organizations to help fill the need for low-income housing.

WHO BENEFITS

Nonprofit organizations benefit directly. The tenants of the housing benefit to the extent that below-market rate rental housing is available. For tax year 2023-24, counties reported 872 property tax accounts. Most are located in Multnomah County.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. The exemption is intended to enable community development corporations and other qualifying local nonprofit organizations to provide affordable rental housing for low income households they would otherwise be unable to provide. To qualify for this popular program, the nonprofit submits an application each year for a one-year exemption, renewable indefinitely before the exemption's sunset date as long as the organization, tenants, and property continue to meet the qualifying criteria. The exemption is simple to administer because the criteria are clear: the benefiting organization must be a qualified nonprofit, the benefiting tenants must have qualifying income levels, and the property must consist of qualifying rental housing. Having met these requirements, a nonprofit will receive its exemption.

The tax expenditure appears to be both a fiscally effective and efficient means of achieving its goal. These exemptions can be counted as matching funds by the state and other local participating jurisdictions to enable the expenditure of HUD Home Investment Partnerships funds.

2.109 NEW OR REHABILITATED MULTI-UNIT RENTAL HOUSING

Oregon Law: Ore. Laws 2017 c.624

Sunset Date: 01-02-2027

Year Enacted: 2017

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.3 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

This provision allows a governing body of a city or county to adopt an ordinance or resolution granting a newly rehabilitated or constructed multi-unit rental housing an exemption from property taxes. The ordinance must publish one of two schedules:

1. The number of years the exemption will be granted for must increase directly with the percentage of units that are rented at affordable rates to households with income at or below 120 percent of the area median income (AMI). Up to a maximum of 10 years can be granted for exemption.
2. Legislation in 2023 (HB 2080), authorizes a city or county to establish a schedule in which, for 10 years, the percentage of property tax exemption granted to an affordable multiunit rental housing complex increases directly with the percentage of units rented to households with an annual income at or below 120 percent of the area median income.

The ordinance or resolution must also include definitions for AMI and affordable for purposes of qualifying for the exemption.

For the ordinance or resolution to take effect, districts representing at least 51 percent of the taxes on the property must pass resolutions supporting the exemption. The exemption applies to the property tax levies of all taxing districts in which the property is located.

A property must file an application to receive this exemption for each year in which the property remains eligible to receive the exemption.

The laws authorizing this exemption are repealed on January 2, 2027. However, any properties granted exemption under an ordinance or resolution authorized by this program continue to receive the exemption through the remainder of the terms of that ordinance or resolution.

PURPOSE

The statutes that allow this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2377 (2017), “The policy purpose of this measure is to provide county and city governing bodies the ability to implement a targeted property tax exemption that encourages development of multiunit rental property that is rented to households with annual income at or below 120 percent of the area median thereby increasing the development, rehabilitation and, ultimately, the supply of workforce and low income housing units.”

WHO BENEFITS

Owners of multifamily housing projects benefit directly from reduction in taxes. The tenants of the housing benefit to the extent that below-market rate rental housing is available as a result.

EVALUATION

Provided by the Oregon Housing and Community Services Department

The ability for local jurisdictions to provide incentives to develop housing affordable to income below 120% AMI is critical as the demand far outstrips supply in that income range. OHCS does not administer this program and therefore cannot speak to the utilization rate or ultimate success.

2.110 HOME SHARE PROGRAM LOW-INCOME HOUSING

Oregon Law: Ore. Laws 2019 c.566

Sunset Date: 01-01-2029 (new properties)

Year Enacted: 2019

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

A city or county may adopt an ordinance granting a property tax exemption to qualified properties renting rooms to tenants in home share programs. No more than 500 properties statewide may be granted the exemption in any property tax year. The available exemptions are divided among jurisdictions that have adopted a related ordinance proportionate to population.

In order to qualify an individual homeowner must rent space in their home to at least one tenant through a home share program. Qualifying tenants must have income that is no more than 60 percent of the area median income, or a lesser percentage determined by the city or county implementing the program. Home share programs are operated by cities, counties, nonprofits, and housing authorities.

Qualified properties continue to receive the exemption for the period established when the exemption is granted regardless of prospective changes to city or county ordinances.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 1045 (2019): “This program is intended as a tool in assisting individuals to stay in their homes, and provide homes for the underhoused.”

WHO BENEFITS

Owners of individual residences renting a portion of their residence to low-income individuals.

EVALUATION

Provided by the Oregon Housing and Community Services Department

If there is a lack of interest on the part of homeowners to taking on roommates through home share programs, then this seems like it could be an effective inducement to encourage participation. The overall impact to taxing jurisdictions

that rely on property taxes to supply their budgets seems relatively limited and, spread out over the entire state as it is, no one county or city would be disproportionately affected.

2.111 DISABLED VETERANS OR SURVIVING SPOUSES OF VETERANS

Oregon Statute: 307.250

Sunset Date: None

Year Enacted: 1921

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.2 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$32,300,000	\$5,800,000
2025-27	\$35,000,000	\$6,300,000

DESCRIPTION

Eligible veterans or surviving spouses may have a portion of their homestead or personal property's assessed value exempt from property taxes. To qualify as a disabled veteran, one must have disabilities of 40 percent or more as certified by the United States Department of Veterans Affairs or any branch of the United States Armed Forces. Alternatively, a veteran can be certified as having disabilities of 40 percent or more by a private licensed physician, however the veteran must have total gross income of not more than 185 percent of federal poverty guidelines.

A veteran's surviving spouse who has not remarried also qualifies for this exemption, even if the veteran had not been disabled.

For the initial year of the exemption, claims must be filed by April 1 or within 30 days of acquiring property between March 1 and June 30. Generally, for subsequent years where the ownership and use of the property have not changed, a new claim is not required.

For tax year 2024-25, the exemption amount is \$25,537. For disabled veterans who have service-connected disabilities, the exemption amount increases to \$30,646. These amounts increase by 3 percent each year.

The surviving spouse of a veteran who died due to service-connected injury or illness or qualified for the higher exemption amount for at least one year also qualifies for the higher exemption amount if they do not remarry.

Qualified nonprofit homes for the elderly as defined in a related expenditure, [2.112, Veterans in Nonprofit Elderly Housing](#), can claim this exemption for their eligible residents if they pass the tax benefit through to these residents in the form of lower rents. The revenue impacts reported here include those real property exemptions for eligible veterans or surviving spouses who live in these qualified nonprofit homes for the elderly.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to recognize the service and sacrifices made by veterans for the country and to compensate veterans and their spouses for reductions in civilian earning capacity due to disabilities.

WHO BENEFITS

For tax year 2023-24, counties reported that approximately 37,000 property tax accounts associated with eligible veterans or surviving spouses claimed this exemption.

EVALUATION

Provided by the Oregon Department of Veterans' Affairs

This tax expenditure achieves its purpose by providing an additional income benefit to disabled veterans and surviving spouses of veterans. In many cases, if it were not for this benefit, the veteran or spouse may lose their home or become dependent on social assistance programs. This additional spendable income also helps the local economy.

The expenditure is fiscally effective. It allows disabled veterans and surviving spouses to remain independent and reduces their use of other social programs.

2.112 VETERANS IN NONPROFIT ELDERLY HOUSING

Oregon Statute: 307.370

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: \$10 million

	Revenue Impact	
	Loss	Shift
2023-25	\$300,000	Less than \$100,000
2025-27	\$300,000	Less than \$100,000

DESCRIPTION

Personal property used in the operation of nonprofit homes for the elderly and attributable to veterans or their surviving spouses is exempt from property taxation. A claim for this exemption must be filed with the county assessor.

To qualify for this exemption:

- The home must be exclusively occupied and used in the operation of a nonprofit home for elderly persons.
- The home must receive at least 95 percent of its operating revenue (excluding investment income) from residents for living, medical, recreational, and social service costs.
- The home cannot allow any of its net earnings to benefit any private individual.
- The nonprofit corporation provides in its articles that, if the corporation is dissolved, any remaining assets revert to the state or to an exempt, religious, charitable, scientific, literary, or educational organization.

There are two related tax expenditures. An exemption for real property is included in expenditure [2.111, Disabled Veterans or Surviving Spouses of Veterans](#). Expenditure [2.127, Nonprofit Housing for the Elderly](#), allows these nonprofit homes the option of using a special assessment that generally results in lower assessed values and taxes on these properties.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to extend veteran property tax exemption benefits to those not owning a home, but who are living in a nonprofit home for elderly persons. In addition, the personal property exemption is to encourage housing for the elderly.

WHO BENEFITS

In tax year 2023-24, five counties reported 14 property tax accounts associated with nonprofit homes for the elderly claimed this exemption for their personal property.

EVALUATION

Provided by the Oregon Department of Veterans' Affairs

This tax expenditure achieves its purpose by allowing disabled veterans and spouses who are living in nonprofit homes for the elderly to receive a rent reduction equivalent to the tax reduction for those who own their homes, as described in [2.111, Disabled Veterans or Surviving Spouses of Veterans](#). This benefit may allow disabled veterans and surviving spouses to remain independent and reduce their use of other social programs.

According to statute, each nonprofit corporation must provide information to the county assessor to show that the appropriate rent credit was given to each applicable resident.

2.113 WORKFORCE HOUSING

Oregon Law: Ore. Laws 2021 c.527

Sunset Date: 06-30-2032 (new exemptions)

Year Enacted: 2021

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

A county with a population less than 15,000 may exempt from property tax a limited number of newly constructed single-family homes if the owner has an annual adjusted gross income below limits that are adjusted for inflation. For 2024, the income limit was \$84,480 for single filers and \$162,960 for joint filers. A county must pass a workforce housing exemption law that sets the percentage of real market value to be exempt and determines for how long exemptions will be approved. The exemption can apply for three to five years. Each year, the county may approve up to five new eligible properties to receive this exemption. Properties that were approved in a previous year do not count against this limit.

For a property to receive the exemption, the owner must file an application and local taxing districts representing at least 51 percent of the taxes on the property must agree to the exemption, after which the exemption applies to the taxes of all districts. To continue receiving the exemption each year after receiving initial approval, the owner must file an application annually. If the initial application was approved before the sunset date, then the applicant can continue receiving the exemption for the duration of the period.

PURPOSE

The law that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2438 (2021), the purpose of this provision is “...to encourage skilled labor migration to rural Oregon.”

WHO BENEFITS

Property owners who have new single family homes constructed in counties with a population less than 15,000. There are currently eight counties that could pass a workforce housing exemption law and use this exemption: Gilliam, Grant, Harney, Lake, Morrow, Sherman, Wallowa, and Wheeler.

EVALUATION

Provided by the Oregon Housing and Community Services Department

The property tax exemption on single-family homes as established in the bill provides incentives for qualified builders and owners to invest and create housing opportunities for people that need to work in these counties. The availability of homes or lack of, can attract and keep teachers, health professionals, and other workers in these communities.

2.114 AFFORDABLE HOUSING COVENANT

Oregon Statute: 307.555

Sunset Date: None

Year Enacted: 2021

2023-24 Estimated Reduction in the Taxable Assessed Value: \$7.8 million

Revenue Impact		
	Loss	Shift
2023-25	\$200,000	Less than \$100,000
2025-27	\$300,000	Less than \$100,000

DESCRIPTION

Land burdened by an affordable housing covenant requiring long-term affordability and owned by an eligible covenant holder is exempt from taxation if the improvements on the land are owner-occupied housing, or if owner-occupied housing is going to be built on the land in the next 10 years.

For owner-occupied condominium units burdened with an affordable housing covenant, 27 percent of the assessed value is exempt from taxation.

An eligible covenant holder must be an agency of the United States government, a public benefit corporation or religious corporation, a consumer housing cooperative, a manufactured dwelling park nonprofit cooperative, or a federally recognized Indian tribe. An affordable housing covenant requires the land to be occupied by low- or moderate-income households. Long-term is defined as a term of no fewer than 99 years.

The legislation that enacted this tax expenditure specified that any sunset under ORS 315.037 does not apply.

PURPOSE

The law that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 3275 (2021), the purpose of this provision is "...to increase the supply of affordable housing in Oregon."

WHO BENEFITS

Eligible covenant holders and the low- and moderate- income households who live on properties burdened with affordable housing covenants.

EVALUATION

Provided by the Oregon Housing and Community Services Department

The partial exemption of tax liability ensures that the land is held for a long time to provide affordable housing opportunities for people. The long-term affordability ensures that the land is not converted to a different use such as commercial or industrial.

2.115 AFFORDABLE HOUSING PROJECTS RECEIVING GRANT

Oregon Law: Ore. Laws 2024 c.110

Sunset Date: 06-30-2031

Year Enacted: 2024 (SB 1537)

2023-24 Estimated Reduction in the Taxable Assessed Value: \$0

	Revenue Impact	
	Loss	Shift
2023-25	Not Yet Available	Not Yet Available
2025-27	Not Yet Available	Not Yet Available

DESCRIPTION

A partial property tax exemption is available to eligible moderate income housing projects (120 percent of the area median income or less) receiving grant money through a city or county that receives a loan from the Housing Project Revolving Loan Fund program administered by Oregon Housing and Community Services (OHCS). Grant money can be used to cover eligible costs, including infrastructure and system development charges, predevelopment costs, construction costs, and land write-downs. The housing developed through this program must be available to households that meet the income requirement.

Because the legislation enacting this statute did not explicitly provide a period of applicability for this tax expenditure, ORS 315.037(3) established that this exemption shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year is 2030-31.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for SB 1537 (2024), the purpose of this exemption “...is to reduce barriers to affordable housing production.”

WHO BENEFITS

Developers of moderate income housing projects receiving the funding. The program includes both multi-family development and homeownership.

IN LIEU

Owners of these developments pay a fee in lieu of taxes to the sponsoring jurisdiction to repay the OHCS loan.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This resource has not yet been made available, so we are not yet able to evaluate its impact.

2.116 ALTERNATIVE ENERGY SYSTEMS

Oregon Statute: 307.175

Sunset Date: 07-01-2029

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: \$440 million

	Revenue Impact	
	Loss	Shift
2023-25	\$13,500,000	\$3,100,000
2025-27	\$14,700,000	\$3,400,000

DESCRIPTION

Solar, geothermal, wind, water, fuel cell, or methane gas energy systems used for heating, cooling, or generating electricity are exempt from property tax. To qualify, the system must be a net metering facility or a system primarily designed to offset onsite electricity use. The proportion of a community solar project that is owned by residential customers or leased by residential subscribers is also exempt from property tax. Additional value added to the underlying property because of the existence of the alternative energy system is exempt. No application is required.

Legislation in 2022 (SB 1519) broadened the exemption to include a proportion of community solar projects and extended the sunset to July 1, 2029. Legislation in 2023 (HB 2080) removes references to proportion of community solar project owned and leased by residential subscribers.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage the use of alternative sources of energy. The revenue impact statement prepared for SB 1519 in 2022 stated that the policy purpose of the additional exemption on community solar projects was “to encourage the development of renewable energy for residential customers that do not have access to individual rooftop solar.”

WHO BENEFITS

For property tax year 2023-24, counties reported that approximately 11,300 properties received this exemption.

EVALUATION

Provided by the Oregon Department of Energy

It is difficult to measure the impact the tax exemption has made on the number of households and businesses installing equipment that uses solar, wind, hydro, or geothermal energy. In prior years the predominant incentives that have encouraged such installations have been the tax credits for [1.434, Alternative Energy Devices \(Residential\)](#) available under the income tax, which sunset after tax year 2017, and [1.436, Energy Conservation Projects](#) within the Energy Incentive Program, which was a grant program funded by tax credit auctions that ended in 2017; these credits were

also applicable to income taxes. The remaining incentives with outstanding income tax credits are [1.436, Energy Conservation Projects](#), sunset 2017, and [1.433, Transportation Projects](#), sunset 2017. The property tax exemption may work in tandem with the Rooftop Solar & Storage Rebate Program authorized by the legislature in HB 2618 in the 2019 session and expanded in 2021 by HB 5006, in 2022 by HB 5202, and in 2023 by SB 5506. Without the exemption, homeowners and businesses might hesitate to invest in a system that would increase their assessed valuation.

2.117 POLLUTION CONTROL FACILITIES

Oregon Statute: 307.405

Sunset Date: 12-31-2007 (for new certifications)

Year Enacted: 1967

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

A pollution control facility owned or leased by a cooperative or nonprofit corporation and used in connection with its trade or business was eligible for a property tax exemption. The last day that a pollution control facility could be certified to receive this exemption was December 31, 2007, however this exemption lasts up to 20 years from the date of certification. The Environmental Quality Commission certified the facility cost and the exemption percentage

A pollution control facility was any land, structure, machinery, equipment, or device that prevented, controlled, or reduced air, water, noise, or nonpoint source pollution, solid or hazardous waste, or recycled or disposed of used oil. In most cases, the percentage allocable to pollution control depended on whether the owner earned any income from the facility. Thus, if a pollution control facility, in addition to reducing pollution, had some useful end product, then only a portion of the construction of the facility might be allocated to pollution control.

The program provided an incentive to cooperatives and nonprofits for installing pollution control facilities not required under current law, defined as “sole purpose facilities.” The program also compensated cooperatives and nonprofits for installing facilities required by the Department of Environmental Quality or by the U.S. Environmental Protection Agency, defined as “principal purpose facilities.”

This exemption was a companion to the Pollution Control income tax credit. For-profit companies were eligible for the income tax credit, while nonprofits and cooperatives were eligible for the property tax exemption.

PURPOSE

To “assist in the prevention, control and reduction of air, water and noise pollution and solid waste, hazardous wastes and used oil in this state by providing tax relief...” (ORS 468.160).

WHO BENEFITS

In 2023-24, Tillamook County reported a single property tax account using this exemption.

EVALUATION

Not evaluated.

2.118 WATERCRAFT CENTRALLY ASSESSED

Oregon Statute: 308.515(3)(a-c)

Sunset Date: None

Year Enacted: 1925

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available*

Revenue Impact		
	Loss	Shift
2023-25	Not Available*	Not Available*
2025-27	Not Available*	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer, but could at a later date.

DESCRIPTION

Certain types of watercraft that would otherwise be centrally assessed are excluded from such assessment and are therefore exempt from taxation. The Department of Revenue is responsible for making a central assessment of designated types of companies and utilities for property tax purposes. Watercraft (such as barges, tugboats, and excursion boats) of water transportation companies involved in transportation of people or goods on inland waters, including border rivers and coastal bays, are centrally assessed for property taxation by the Department of Revenue. Also, the department assesses watercraft of centrally assessed utilities.

Properties exempt from central assessment and taxation include:

- Watercraft of water transportation companies used on the high seas or outside Oregon. Trips between inland ports and high seas are treated as high seas use.
- Property used by or for water transportation companies exclusively for hire by other persons for booming and rafting, dredging, log or marine salvage, ship berthing, maintenance, sludge removal, cleaning or repair, marine or water-based construction, or guide service.
- Interstate ferries.

A related provision, [2.139, Watercraft Locally Assessed](#), allows for the exemption or special assessment of some other types of commercial watercraft.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to apportion to Oregon the taxable value of watercraft based on their use in Oregon.

WHO BENEFITS

Few water transportation companies have property that qualifies for the exemption.

EVALUATION

Not evaluated.

2.119 AIRCRAFT UNDER 75,000 POUNDS OWNED BY AIR TRANSPORTATION COMPANIES

Oregon Statute: 308.565(5)

Sunset Date: None

Year Enacted: 1987

2023-24 Estimated Reduction in the Taxable Assessed Value: \$7.5 million

Revenue Impact		
	Loss	Shift
2023-25	\$200,000	Less than \$100,000
2025-27	\$200,000	Less than \$100,000

DESCRIPTION

Aircraft that weigh less than 75,000 pounds and are owned by air transportation companies are taxed on only 60 percent of the value which would have otherwise been assigned for property taxation. Transportation company aircraft weighing 75,000 pounds or more are fully taxable and are centrally assessed by the Department of Revenue in proportion to the company's business in Oregon.

Aircraft not owned by air transportation companies are described in [2.066, Foreign-Owned Aircraft and Aircraft Not Owned by Air Transportation Companies](#).

PURPOSE

The statute that allows this expenditure do not explicitly state a purpose. Presumably, the purpose is to provide a favorable business climate for air transportation companies that own relatively light-weight aircraft.

WHO BENEFITS

For the 2023–24 property tax year, few air transportation companies owned aircraft under 75,000 pounds and benefited from this exemption.

EVALUATION

Not evaluated.

2.120 HOMESTEAD EXEMPTION FOR ACTIVE DUTY MILITARY

Oregon Statute: 307.286

Sunset Date: None

Year Enacted: 2005

2023-24 Estimated Reduction in the Taxable Assessed Value: \$3.0 million

Revenue Impact		
	Loss	Shift
2023-25	\$100,000	Less than \$100,000
2025-27	\$100,000	Less than \$100,000

DESCRIPTION

Oregon residents who are serving in the Oregon National Guard, military reserve forces, or organized militia of any other state may apply for an Oregon property tax exemption on their homestead up to a specified amount of assessed value if:

- The resident serves on active duty under Title 10 of the United States Code or is deployed under the Emergency Management Assistance Compact for at least one day of the tax year (July 1 through June 30) claimed.

- The resident serves at least 178 consecutive days on active duty, regardless of the location of service, and
- Application is made to the county assessor by August 1 following the end of the tax year for which the exemption is claimed.

In tax year 2024-25, the maximum exemption is \$108,367. The allowable amount of exemption increases by three percent per year.

If the qualified service member dies while performing the service, the person occupying the service member's home may file for the exemption, even if the service member died before completing the minimum number of service days.

When a property is disqualified or stops receiving an exemption, the property's maximum assessed value is reset as required by the Oregon Constitution. While this is true for all property tax exemptions and special assessments, this can have a particularly noticeable impact for recipients of this exemption, which may last only a single year. In some cases, a taxpayer's taxes the year after receiving this exemption may be higher than they would have been if they did not receive this exemption.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to assist Oregon households where a member has been called away from home to active military service during the year.

WHO BENEFITS

Members of the Oregon National Guard, Armed Forces Reserves, or organized militia who are homeowners and who spend extended periods on federal active duty service during the tax year. Members of their households may also benefit from this expenditure.

EVALUATION

Provided by the Oregon Military Department

This tax expenditure alleviates property tax burdens for members of the Oregon National Guard and Reserve members of the United States Armed Forces who are deployed on federal active duty for 178 days or more. The direct recipients are the service members and their families, who often are impacted financially and emotionally during long deployments. It serves as valuable acknowledgement of the sacrifices service members and their families make in honored service to the nation.

2.121 SURVIVING SPOUSE OF PUBLIC SAFETY OFFICER

Oregon Statute: 307.295

Sunset Date: 06-30-2032

Year Enacted: 2016

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.4 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Oregon counties may, by ordinance or resolution, allow an exemption of up to \$250,000 of assessed value of the homestead of a surviving spouse of a fire service professional, police officer, or reserve officer killed in the line of duty. A homestead is defined as the owner-occupied principal dwelling, either real or personal property, owned by a surviving spouse and the tax lot upon which the dwelling is located. A surviving spouse seeking the exemption must file an application with the county assessor on or before April 1 preceding the property tax year for which the exemption is sought. To qualify for the exemption, the surviving spouse must not remarry.

Legislation in 2023 (HB 2080) extended the scheduled sunset of the provision from June 30, 2025 to June 30, 2032.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2080 (2023), "... the purpose of this measure is to allow counties to extend tax exemption for police, firefighters, and their families and to extend similar support to first responders."

WHO BENEFITS

The surviving spouses of fire service professionals, police officers, or reserve officers killed in the line of duty. Roughly ten people benefit from this exemption.

EVALUATION

Provided by the Oregon Military Department

This tax expenditure may impact wildland firefighting personnel employed by the Oregon Military Department. The Oregon Military Department employs multiple full time and seasonal Wildland Fire Fighters to support fire suppression missions at our training sites across the state, and who provide support to the Department of Forestry in their wildland firefighting mission. On an as needed basis we also activate several hundred members of the Oregon National Guard into a State Active Duty Status, making them temporary state employees, to support the Department of Forestry in their wildland firefighting mission. These personnel act as Type 2 Wildland Firefighters and are trained by the Department of Public Safety Standards and Training. This expenditure serves as valuable acknowledgement of the sacrifices firefighters and their families make in service to the state.

2.122 SEISMIC UPGRADES

Oregon Law: Ore. Laws 2017 c.537

Sunset Date: 12-31-2027 (for new certifications)

Year Enacted: 2017

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

A city or county may adopt an ordinance or resolution providing full or partial exemption from property tax for eligible property that will be seismically retrofitted. The ordinance or resolution adopted must specify the period, not to exceed 15 years, for which the exemption may be granted. The local ordinance does not become effective unless the districts representing at least 75 percent of the property taxes within the territory of the city or county agree to the property tax incentive program.

Eligible property is improvements built before January 1, 1993 that constitute a commercial, industrial, or multifamily building. Eligible costs include but are not limited to all costs directly related to structural seismic retrofitting, including the necessary costs of demolition and restoration of similar architectural finishes, electrical systems, plumbing and mechanical systems. Also eligible are costs for architectural and engineering fees and fees for testing, insurance and project management related to the seismic retrofitting. Eligible costs are reduced by amounts of local, state, and federal financial incentives received for the seismic retrofitting, exclusive of this property tax exemption.

Property subject to central assessment under ORS 308.505 to 308.674 and state-appraised industrial property under 306.126 are not eligible for the exemption. Costs that are not eligible include, but are not limited to, costs associated with refurbishing or remodeling that are intended to enhance the aesthetics, functionality or marketability of the improvements but do not extend the seismic life safety of the improvements. Also not eligible are costs for abatement of hazardous materials, including but not limited to asbestos, or for relocation or loss of rent during the seismic retrofitting.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to legislative staff revenue impact statement for SB 311 (2017), the purpose of this provision “is to provide authority to cities and counties to design and implement property tax exemption programs intended to partially or fully offset the costs related to seismically retrofitting commercial, industrial, or multifamily buildings, thereby mitigating potential losses to life and property resulting from a Great Cascadia Subduction Zone earthquake.”

WHO BENEFITS

Owners of properties that are seismically upgraded. Counties report that very few properties have received this exemption since its inception.

EVALUATION

Provided by the Oregon Department of Emergency Management

Due to the high likelihood that a Cascadia Subduction Zone earthquake would result in building structural failures on a massive scale along the western side of the state, the Department of Emergency Management is supportive of implementation and continuation of a property tax incentive that enables businesses and property owners to seismically retrofit commercial, industrial or multifamily buildings.

2.123 RAILROAD RIGHT OF WAY IN WATER DISTRICT

Oregon Statute: 264.110

Sunset Date: None

Year Enacted: 1943

2023-24 Estimated Reduction in the Taxable Assessed Value: \$22 million

	Revenue Impact	
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Railroad rights of way, improvements, and rolling stock are exempt from property tax imposed by any water supply district that was formed after June 9, 1943.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing a property that would not significantly benefit from a water district’s services.

WHO BENEFITS

Railroad companies that might otherwise be considered to have property located within the boundaries of water supply districts.

EVALUATION

Not evaluated.

2.124 RAILROAD RIGHT OF WAY IN HIGHWAY LIGHTING DISTRICT

Oregon Statute: 372.190

Sunset Date: None

Year Enacted: 1947

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.0 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

Railroad rights of way are exempt from property tax imposed by a highway lighting district unless the right of way is at a grade crossing. A highway is defined as any road or way open to public travel.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing a property that would not significantly benefit from a lighting district's services.

WHO BENEFITS

Railroad companies that have property in highway lighting districts. Highway lighting districts collect a very small amount of tax.

EVALUATION

Not evaluated.

2.125 RAILROAD RIGHT OF WAY IN RURAL FIRE DISTRICT

Oregon Statute: 478.010(2)(d)

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.0 billion

Revenue Impact		
	Loss	Shift
2023-25	\$3,800,000	\$200,000
2025-27	\$4,100,000	\$200,000

DESCRIPTION

Railroad rights of way, improvements, and rolling stock are exempt from property tax imposed by a rural fire protection district unless the railroad consents to be taxed.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing a property that would not significantly benefit from a rural fire district.

WHO BENEFITS

Railroad companies that might otherwise be considered to have property in fire districts.

EVALUATION

Not evaluated.

2.126 USE-RESTRICTED MULTI-UNIT RENTAL HOUSING

Oregon Statute: 308.704

Sunset Date: None

Year Enacted: 2001

2023-24 Estimated Reduction in the Taxable Assessed Value: \$150 million

	Revenue Impact	
	Loss	Shift
2023-25	\$4,500,000	\$600,000
2025-27	\$5,000,000	\$700,000

DESCRIPTION

Owners of multi-unit rental housing property that is limited by government restrictions on use may apply for special assessment of the property. The property must be residential, consist of four or more units, and not be an assisted living facility. The restrictions on use include restricting rents and qualifying tenants based on income which thereby allows the owner to take advantage of government incentive programs such as a federal low-income housing tax credit, a low interest or government guaranteed loan, or rent subsidies.

A property granted this special assessment may have the taxable special assessed value of the property calculated by using either of:

- An annual net operating income approach and a capitalization rate, or
- An adjustment of market value based on the ratio of the average rent of restricted income rental units to the average rent of similar units that do not have tenant income qualifications and limited rents.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to establish common appraisal methods and tax treatment for multi-unit low-income rental housing complexes in a way that provides tax relief to compensate for the government-imposed restrictions on use of such properties.

WHO BENEFITS

For property tax year 2023–24, almost all counties reported at least one property using this special assessment; statewide there are 636 property tax accounts receiving this special assessment.

EVALUATION

Provided by the Oregon Housing and Community Services Department

This expenditure achieves its purpose. The community of affordable housing developers, consisting of both for-profit and nonprofit organizations, were experiencing economic hardships with the valuation of properties based on the cost of development. The restricted rental incomes of the affordable housing developments throughout the state did not generate enough cash flow to cover property taxes based on valuations related to cost of development. Owners of some newly created developments were forced to access operating reserves as a short-term gap to meet the additional property tax expenses. Without the relief offered through this special assessment, affordable housing developments were at risk of technical or actual default with their primary lenders. Without the relief, these same lenders would be less willing to underwrite new loans without additional subsidies from government entities thereby reducing the number of new affordable units that could be deployed.

The amount of loss identified assumes that the properties should have been assessed by other methods. Rather, OHCS believes that the more accurate evaluation may be the net income approach.

2.127 NONPROFIT HOUSING FOR THE ELDERLY

Oregon Statute: 308.490

Sunset Date: None

Year Enacted: 1969

2023-24 Estimated Reduction in the Taxable Assessed Value: Less than \$1 million

Revenue Impact		
	Loss	Shift
2023-25	Less than \$100,000	Less than \$100,000
2025-27	Less than \$100,000	Less than \$100,000

DESCRIPTION

The assessed value of a home for the elderly operated by a nonprofit corporation may only be calculated using certain appraisal methods. These methods should not take into account considerations of replacement cost, but rather consider:

- The amount of money for which the property may be exchanged in a reasonable period of time under conditions in which both parties to the exchange are able, willing, and reasonably well informed
- The gross income that reasonably could be expected from the property if leased or rented to the public generally, less annual operating expenses, reserves for replacements and insurance, depreciation, and taxes
- The relative supply and demand for similar properties
- The relative value of the location of the property.

Use of these considerations rather than replacement cost generally results in lower assessed values and taxes on these properties.

The nonprofit corporation must be organized and operated to provide permanent residential, recreational, and social facilities primarily for the elderly and receive 95 percent of its gross operating revenue from payments for housing, medical, and recreation services received in its facilities.

PURPOSE

The statutory policy is to recognize "... benefits inherent in operation of these homes, especially in the housing and care furnished to elderly persons for whom this state and its political subdivisions otherwise might be responsible" (ORS 308.490(1))

WHO BENEFITS

In tax year 2023–24, four counties reported that 18 property tax accounts benefitted from this special assessment.

EVALUATION

Not evaluated.

2.128 HOMES REBUILT AFTER 2020 WILDFIRES

Oregon Law: Ore. Laws 2024 c.94

Sunset Date: None

Year Enacted: 2024 (SB 1545)

2023-24 Estimated Reduction in the Taxable Assessed Value: Not Available

Revenue Impact		
	Loss	Shift
2023-25	Not Available	Not Available
2025-27	Not Available	Not Available

DESCRIPTION

Oregon counties may elect to allow homesteads rebuilt to replace a homestead destroyed by a wildfire in September 2020 to be specially assessed if:

- The homestead is in a county that was covered by a state of emergency declared in response to the wildfire, and
- It is constructed on the same lot by the same owner as the destroyed homestead.

The special assessment only applies to the new property to the extent that the square footage of the new homestead is not larger than the destroyed homestead. Any portion of the new homestead that exceeds the square footage of the destroyed homestead is assessed and taxed normally.

For the first year of special assessment, the taxable value of the eligible property is the real market value of the property from tax year 2020-21—prior to the wildfires—multiplied by the maximum assessed value the property would have had if not eligible for the exemption in the applicable property tax year divided by the real market value of the property in the applicable property tax year after rebuilding. The owner must file a claim by December 31, 2025 if the initial year of the special assessment is before the 2025-26 tax year, or otherwise between January 1 and April 1 to initially receive this special assessment for the following tax year. In subsequent years, the owner must attest that they will continue to occupy the homestead for the following year to continue receiving the special assessment.

The property continues to receive this special assessment until:

- The owner no longer occupies the homestead, except when required to be absent by reason of health or active military service,
- The homestead is rented to another person for any duration, or
- The homestead is transferred to new ownership.

The legislation that enacted this tax expenditure specified that any sunset under ORS 315.037 does not apply.

PURPOSE

The legislation creating this special assessment does not explicitly state a policy purpose. According to the legislative staff revenue impact statement for SB 1545 (2024), the purpose of this special assessment is "to provide property tax relief to those that had their homesteads destroyed in the September 2020 wildfires and have rebuilt the homestead on the same lot."

WHO BENEFITS

Homeowners whose homes were destroyed by wildfires in September 2020.

EVALUATION

Not evaluated.

2.129 FARMLAND

Oregon Statute: 308A.062, 308A.068, and 308A.128

Sunset Date: None

Year Enacted: 1967

2023-24 Estimated Reduction in the Taxable Assessed Value: \$18 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$411,000,000	\$60,000,000
2025-27	\$448,000,000	\$65,300,000

DESCRIPTION

Land used exclusively for farming may be specially assessed at its value for farm use instead of its highest and best use value.

Farm use value is determined using the income approach. Under this approach, farmland value is based on the farmland's potential ability to generate farm income. Farmland is categorized into one of seven classifications related to soil quality. Farmland value is then established on a per acre basis for each class of land. Similarly classified farmland can be valued differently depending on the value zone (based on such variables as rainfall, expected frost days, and distance to market) the farmland resides within. This value is converted to present value using the local property tax rate plus the five-year average interest rate charged by the Federal Farm Credit Bank on loans for Oregon farm properties.

Farm activity must involve the use of the land for crops, livestock, poultry, fur bearing animals, honeybees, dairies, animal husbandry, aquatic species, or cultured Christmas trees. Farm use land may also include a woodlot of 20 acres or less, wasteland, land under farm buildings, and ponds. In 2009, the Oregon Legislature expanded the definition of farm use and farmland to include land subject to or in the process of implementing a remediation plan. Remediation plans are certified by the Oregon State University Extension Service and are plans to remediate or mitigate severe adverse conditions on farmland. The farmer must intend to make a profit, with an exception for donations to food banks or schools, using accepted farming practices.

There are two farm use special assessment categories: farmland inside an exclusive farm use (EFU) zone and farmland in a nonexclusive (non-EFU) zone. The farm use value of EFU and non-EFU farmland is determined the same way. However, the eligibility and disqualification procedures are different.

Special assessment of EFU farmland does not require an application if the land is in a qualifying farm use. EFU farmland is disqualified if it is not being farmed in a qualifying farm use, the land is approved for nonfarm dwelling under ORS Chapter 215, or the land is rezoned to a non-EFU zone.

An application must be filed for special assessment of non-EFU zoned farmland. There are two tests for qualification in a non-EFU zone, farm use and gross income. Farm use must have occurred in the current year and the two years prior. Gross income from farm use is required in three of the last five non-flood, non-drought, or non-farmer illness calendar years. For farms of 6.5 acres or less, the minimum gross income is \$650; for farms of more than 6.5 acres, but less than 30 acres, the minimum income required is at least equal to the product of \$100 times the number of acres; and for farms of 30 acres or more, the income requirement is \$3,000. When land is disqualified, it may be assessed at current market value and an additional tax may be imposed.

Additionally, Oregon statute (ORS 308A.128) exempts land that is qualified for special assessment as EFU farmland from the assessments and property taxes of certain sanitary and water supply districts or authorities.

PURPOSE

“The Legislative Assembly recognizes that agriculture and related land uses contribute significantly to Oregon’s character and economy. The Legislative Assembly finds that providing the means for agriculture to continue and prosper is in the interest of all citizens of this state, who benefit directly or indirectly from agriculture production and stewardship of farmlands and ranchlands. Valuation of farm properties based upon the market data from sales for investment or other purposes not connected with bona fide farm use encourages the conversion of agriculture land to other uses. The identification of agricultural land for farm use, as provided by law, substantially limits alternative use of such land and justifies the valuation of that land based on its agricultural production capability. Therefore, it is the declared intent of the Legislative Assembly that bona fide farm properties be assessed for ad valorem property tax purposes at a value that is exclusive of values attributable to urban influences of speculative purposes” (ORS 308A.050).

WHO BENEFITS

Owners of farmland benefit directly. In tax year 2023–24, approximately 15.4 million acres of land were assessed at farm use value as reported by counties. Fifteen percent of the acreage is in Western Oregon and 85 percent is in Eastern Oregon.

EVALUATION

Provided by the Department of Land Conservation and Development

Special farm use assessment is a key component of farm financial stability. Special assessment provides an essential incentive that helps preserve the maximum amount of farmland in large blocks in accordance with Oregon's Agricultural Land Use Policy (see ORS 215.243). Zoning limits development opportunities in exclusive farm use zones so the incentives provided by special assessment are critical to preventing conversion of farmland to other uses.

The effective protection of agricultural land requires well-coordinated special assessment and land use programs.

Special assessment shifts the burden of funding public services onto other community residents and businesses that do not have special assessments. However, farm use provides a variety of benefits to the entire state including a supply of locally grown food, employment opportunities, financial opportunities for agricultural processors and other value-added businesses, carbon sequestration, and protection of habitat and scenic values.

The special farm use assessment program can conflict with other aspects of Oregon's land use programs. Inside urban growth boundaries (UGBs) it can discourage timely development by lowering an owner's holding costs and tying up land that is otherwise planned for urban development. This can put pressure on cities to expand their UGBs onto rural EFU lands when existing farmland inside the UGB is withheld from development.

2.130 FARM HOMESITES

Oregon Statute: 308A.253

Sunset Date: None

Year Enacted: 1987

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.1 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$26,300,000	\$4,800,000
2025-27	\$29,300,000	\$5,300,000

DESCRIPTION

A farm homesite being used in conjunction with specially assessed farmland has a special assessed property value. "Homesite" means land including all tangible improvements to the land under and adjacent to a dwelling and other structures, customarily provided in conjunction with the dwelling. It does not include the value of dwellings or structures built on the land.

Farm homesites in nonexclusive farm use (non-EFU) zones qualify for special assessment only if the farmland was operated as a part of a farm unit that produced more than one-half of the adjusted gross income of the owner or owners in the year prior to application and each subsequent year the special assessment is desired. Farm homesites in exclusive farm use zones are not subject to the aforementioned income requirements. Because of the non-EFU income requirements, few specially assessed homesites are in these areas.

The homesite specially assessed value is calculated as the average per acre real market value, as defined in ORS 308.205, for the contiguous bare farmland under the same ownership plus up to \$4,000 for land improvements. Land improvements would include a well and septic system necessary for a homesite. If disqualified, no additional tax is imposed unless the homesite is established as a nonfarm dwelling under ORS 215.236.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to extend the benefit of specially assessed farmland to farm homesites. See purpose for [2.129, Farmland](#).

WHO BENEFITS

For tax year 2023-24, 31 counties reported approximately 39,000 property tax accounts.

EVALUATION

Provided by the Department of Land Conservation and Development

Farm homesites are required to be used in conjunction with a farm operation. From a land use perspective, within exclusive farm use zones, farm homesites allowable when used to house people who are primarily engaged in farm operations on the property. Extending special farm assessments to farm homesites reinforces the effects of special assessment for 2.129, Farmland.

2.131 HISTORIC PROPERTY

Oregon Statute: 358.505

Sunset Date: 06-30-2024 (application deadline)

Year Enacted: 1975

2023-24 Estimated Reduction in the Taxable Assessed Value: \$110 million

Revenue Impact		
	Loss	Shift
2023-25	\$3,300,000	\$1,000,000
2025-27	\$2,400,000	\$700,000

DESCRIPTION

Historic properties can be specially assessed for 10 years. The last date that new properties could be accepted for the Special Assessment Property Tax Program for Historic Properties was June 30, 2024. For qualifying properties, the assessed value cannot exceed the real market value at the time of application; increased value from improvements is exempt for 10 years. In the first year of the special assessment the assessed value is generally similar to the assessed value at the time of the application. Applications for special assessment must be reviewed by the State Historic Preservation Officer. Applicants must pay a fee and file a plan for proposed rehabilitation and maintenance. Legislation in 2022 (HB 4054) extended the sunset for applications to June 30, 2024. As of the date of publication of this report, there has been no legislation to extend the sunset for applications beyond June 30, 2024.

Prior to the 2022 legislative changes, the assessed value of properties specially assessed under this statute was limited to the assessed value at the time of application, and the assessed value in the initial years of the special assessment was typically significantly lower than the assessed value at the time of application.

Property is removed from this special assessment at the end of the 10-year period but can qualify for a second 10-year period if reapplication is approved and the local government (city, or county if not located in a city) does not prohibit it (by resolution). Approval of reapplication requires plans for significant investment in seismic upgrades, energy conservation, or disability access. Following the second 10-year period, the property can no longer qualify.

If, during a special assessment term, the historic property is disqualified, either at the owner's request or from failure to meet the requirements, the tax savings from having a low value must be repaid. The additional tax and interest are equal to the sum of the tax benefit received for each year of special assessment as historic property. In addition, a penalty of 15 percent of the back taxes and interest owed is levied upon the disqualified property owner. However, if the property is destroyed or substantially altered by acts of nature or other events for which the owner is not responsible, or transferred to a tax-exempt owner, or transferred to a new owner who expressly assents to and continues to implement the preservation plan in effect, no additional tax or penalty is charged.

PURPOSE

To "...maintain, preserve and rehabilitate properties of Oregon historical significance..." (ORS 358.475).

WHO BENEFITS

In the tax year beginning July 1, 2024 there were 11 new and 147 total historic properties participating in the program. Of the 11 new participating properties, 6 were located within Multnomah County. Participating properties are in almost every county in the state, but they are concentrated along the Interstate 5 corridor. Properties in Multnomah County represent most of the total assessed value of all participating properties.

EVALUATION

Not evaluated.

2.132 WILDLIFE HABITAT

Oregon Statute: 308A.415

Sunset Date: None

Year Enacted: 2003

2023-24 Estimated Reduction in the Taxable Assessed Value: \$87 million

	Revenue Impact	
	Loss	Shift
2023-25	\$2,000,000	\$300,000
2025-27	\$2,100,000	\$400,000

DESCRIPTION

Owners of property that is clearly identifiable as containing significant wildlife habitat property or zoned as exclusive farm use, mixed farm and forest use, or forest use may apply to participate in a wildlife habitat conservation management plan. Application is made to the Department of Fish and Wildlife. By entering such a plan, the property owner receives the benefit of having the property valued as the farm or forest land special assessment without being required to meet all the farm or forest land special assessment qualifications. See [2.129, Farmland](#); [2.136, Western Private Forestland](#); or [2.137, Eastern Private Forestland](#), for information about these programs.

Wildlife habitat special assessment is only available in counties or cities that have requested to be in the program. Management plans must be developed in conjunction with a cooperating agency such as the Department of Fish and Wildlife, Soil and Water Conservation Districts, the Oregon State University Extension Service, or other natural resource agency or professional. The plans must be approved by the Department of Fish and Wildlife. Once approved, the land is assessed at either the farm use or forestland value. If land becomes disqualified, an additional tax may be imposed.

Once property is assessed under wildlife habitat special assessment, the property may roll back into the original farm or forest use special assessment without penalty if certain conditions are met. Likewise, farm or forest use specially assessed property may roll into the wildlife habitat special assessment without penalty for leaving the farm or forest use.

PURPOSE

To encourage “the protection and preservation of wildlife resources ... by recognizing wildlife habitat conservation and management as a legitimate land use” (ORS 308A.403).

WHO BENEFITS

The direct beneficiaries are landowners who voluntarily enter into a Wildlife Habitat Conservation and Management Program (WHCMP) approved by the Department of Fish and Wildlife. As of 2024, there are 385 landowners enrolled in the WHCMP program. Properties of these landowners are located in 15 counties.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

In general, the department believes the program is a useful, voluntary conservation tool to help protect wildlife habitat. Private lands play an essential role in conservation of fish, wildlife, and habitat and there is broad interest among landowners to participate in conservation. The program helps to conserve important habitats such as oak woodland, streamside riparian areas, wetlands, among others. The program has historically seen a lot of interest from landowners and support from partners, such as the Soil and Water Conservation Districts. Counties and choose to opt in to the program. Counties that choose to opt out of the program cite reasons such as low interest from landowners, low suitability of available lands, and revenue constraints. Landowners found not in compliance with their approved Wildlife Habitat and Conservation Management Plan may be unenrolled from the program, and the department then notifies the county assessor. Counties can then either permit the property to roll back into a farm or forest use special assessment without penalty if certain conditions are met, or an additional tax may be imposed.

The program has been a useful tool for voluntary conservation, however the agency workload associated with administering the program has at times been unwieldy. When the WHCMP program was created, the language was prescriptive in obligating the department to review, monitor, and ensure compliance with the program but did not provide dedicated resources to the agency for the work. These prescriptive requirements and limited department capacity created barriers to implementation of the program and led to a pause in the program certain ODFW Watershed Districts. Given the high level of interest in the WHCMP program among conservation partners, in 2022 the department worked closely with partners and legislative sponsors to amend ORS 308A in a manner that would allow the WHCMP to re-open in paused areas and improve the functionality of the program overall. Included in the amended statute were the following updates:

- A better focus on conservation priorities by allowing ODFW to set enrollment criteria
- Removing barriers to program sustainability by changing the compliance burden on the agency’s monitoring from ‘shall’ to ‘may’
- Adding a landowner attestation of compliance when enrolling
- Moving to a complaint-based compliance framework rather than a monitoring-based framework, which we believe is more consistent with other deferral programs
- Provide more flexibly to partner with SWCDs and others on implementing elements of the program

In addition to the statutory changes, the department is also taking steps to streamline the simplify the landowner application process and expand the technical resources available to landowners to help them maintain compliance with the program. The department is currently undergoing rulemaking to revise OAR 635-430 to be in alignment with the revised statute (anticipated Fish and Wildlife Commission decision on August 9, 2024), and the department plans to re-open paused areas in a pilot-test approach beginning in early 2025.

There are several elements crucial to the success of the WHCMP program:

- Good communication between the department and counties,
- Strong participation from conservation organizations and cooperating agencies to ease the administrative burden for the department and assist landowners with their implementation responsibilities, and
- Commitment from enrolled landowners to implement their plans and good communication with the Department, the counties, and subsequent landowners who may inherit enrollment in the program.

2.133 CONSERVATION EASEMENTS

Oregon Statute: 308A.456

Sunset Date: None

Year Enacted: 2007

2023-24 Estimated Reduction in the Taxable Assessed Value: \$32 million

	Revenue Impact	
	Loss	Shift
2023-25	\$700,000	\$100,000
2025-27	\$700,000	\$100,000

DESCRIPTION

Qualifying property owners can execute an easement on all or a portion of their property. The owner executes and records an easement on their property that exclusively commits that property for a designated conservation purpose. The easement is placed in the control of a qualifying public entity or other qualifying holder who is responsible for ensuring the property is managed consistent with the easement. Following certification to the county assessor, the property that is the subject of the easement is specially assessed depending on which special assessment it might

qualify for, either as forestland (2.136, [Western Private Forestland](#) or 2.137, [Eastern Private Forestland](#)) or as farmland (2.129, [Farmland](#)).

Failure to manage the land in accordance with the terms of the conservation easement can result in disqualification by the assessor. In the event of disqualification, an additional tax may be imposed.

PURPOSE

“...retaining or protecting natural, scenic, or open space values of real property, ensuring its availability for agricultural, forest, recreational, or open space use, protecting natural resources, maintaining or enhancing air or water quality, or preserving the historical, architectural, archaeological, or cultural aspects of real property” (ORS 271.715).

WHO BENEFITS

Landowners who set aside land for conservation and those already enrolled in other special assessment programs who wish to transfer land to this program without penalty. Counties reported that just over 300 property tax accounts in 14 counties received this special assessment in tax year 2023-24.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

This program offers another advantage to holding land in conservation easements for landowners as they can get special assessments as farm or forest land and the accompanying tax benefits. As such, wildlife and fish benefit from the existence of more habitat on these private lands. The people of Oregon and visitors enjoy the experience of hunting, fishing, and viewing wildlife that is enhanced through the existence of more lands set aside for conservation. In areas where habitat is degraded, nearby conservation lands can be critical in maintaining species integrity.

2.134 OPEN SPACE LAND

Oregon Statute: 308A.315

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: \$48 million

	Revenue Impact	
	Loss	Shift
2023-25	\$1,100,000	\$200,000
2025-27	\$1,200,000	\$200,000

DESCRIPTION

Open space land is specially assessed for property tax as though its current highest and best use is open space use rather than an alternative use. While the land benefits from the special assessment, improvements on open space land do not receive the special assessment and are valued normally.

Open space land is any land designated as open space in an official comprehensive land use plan or any land that, if preserved in its present use, would accomplish one of the following:

- Conserve and enhance natural or scenic resources
- Protect air, streams, or water supply
- Promote conservation of soils, wetlands, beaches, or tidal marshes
- Conserve landscaped areas, such as golf courses
- Enhance the value of neighboring parks, forests, wildlife preserves, or other open space
- Enhance recreation opportunities
- Preserve historic sites

- Promote orderly urban or suburban development
- Retain land in its natural state under conditions required by the legislative body granting the open space classification.

Open space land may be changed from one open space use to another without paying the additional tax. However, if land is withdrawn from open space classification, any tax benefits received from open space classification in previous years must be paid back plus 8 percent annual interest. The amount of the payback is based on the difference between the assessed value in an alternative use and open space value in the year of withdrawal and each year the land was specially assessed.

PURPOSE

“The Legislative Assembly declares that it is in the best interest of this state to maintain, preserve, conserve and otherwise continue in existence adequate open space lands and their vegetation to assure continued public health by counteracting pollutants and to assure the use and enjoyment of natural resources and scenic beauty for the economic and social well-being of this state and its people. The Legislative Assembly further declares that it is in the public interest to prevent the forced conversion of open space lands to more intensive uses as the result of economic pressures caused by the assessment of those lands for purposes of property taxation at values incompatible with their preservation as open space lands, that assessment practices must be designed to permit the continued availability of open space lands for these purposes and that it is the intent of ORS 308A.300 to 308A.330 to so provide.” (ORS 308A.303).

WHO BENEFITS

County assessors reported that approximately 370 properties in 17 counties benefitted from this tax expenditure in tax year 2023-24.

EVALUATION

Provided by the Oregon Parks and Recreation Department

This exemption appears to achieve its stated purpose by encouraging the preservation of open space and park land. Little information or resources exist to allow an in-depth quantitative evaluation of this program, but as a matter of public policy, it contributes to Oregon’s quality of life and helps meet the needs of Oregon’s growing population for open spaces, greenways, natural settings, and recreational facilities. In addition, the ecosystem services provided by open space in terms of flood protection, water filtration, groundwater recharge, carbon sequestration, protection of biodiversity, air quality enhancement, recreation opportunities and other services essential to the health and well-being of society represent a significant economic and social benefit to Oregonians. Many of these services are particularly important as Oregonians adapt to impacts of climate change. Similarly, the social and recreation benefits during the global COVID-19 pandemic, which allow Oregonians a diversity of opportunities to safely experience nature and outdoor activities unavailable in more developed urban and suburban areas, is significant. Finally, the program leverages public investment by encouraging land protection and management in partnership with nongovernment entities that also contribute to the public good.

2.135 FOREST HOMESITES

Oregon Statute: 308A.253

Sunset Date: None

Year Enacted: 1989

2023-24 Estimated Reduction in the Taxable Assessed Value: \$390 million

	Revenue Impact	
	Loss	Shift
2023-25	\$9,000,000	\$1,400,000
2025-27	\$9,700,000	\$1,500,000

DESCRIPTION

A forest homesite used in conjunction with specially assessed forestland or highest and best use forestland may have a specially assessed property value. The homesites are adjacent to forestland under the same ownership, most of which is participating in one of the following special assessments: [2.136, Western Private Forestland](#), [2.137, Eastern Private Forestland](#), or [2.138, Small Tract Forestland Option](#). “Homesite” means land including all tangible improvements to the land under and adjacent to a dwelling and other structures, customarily provided in conjunction with the dwelling. It does not include the value of the home built on the land which is assessed the same as any other house.

A forest homesite used in conjunction with growing and harvesting trees must be on a parcel of more than 10 acres of highest and best use or designated forestland. The homesite specially assessed value is the value of one acre, calculated as the average real market value for all contiguous bare forestland (on a per acre basis) under the same ownership, plus up to \$4,000 for land improvements. Land improvements include a well and septic system necessary for a homesite.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage growing and harvesting trees on forestland.

WHO BENEFITS

For 2023–24, counties reported approximately 12,570 property tax accounts with forest homesites.

EVALUATION

Provided by the Oregon Department of Forestry

Extending special forest assessments to forest homesites reinforces the effects of special assessments for forestland.

2.136 WESTERN PRIVATE FORESTLAND

Oregon Statute: 321.354

Sunset Date: None

Year Enacted: 1977

2023-24 Estimated Reduction in the Taxable Assessed Value: \$5.9 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$134,000,000	\$23,600,000
2025-27	\$144,000,000	\$25,400,000

DESCRIPTION

Forestland is considered either: 1) highest and best use forestland or 2) designated forestland which is specially assessed. Value is determined for these specially assessed properties by the potential of the land to grow timber. Each acre of land is assigned one of eight productivity classes based on the rate of growth of standing timber or the potential to grow timber. Western Oregon includes Benton, Clackamas, Clatsop, Columbia, Coos, Curry, Douglas, Hood River, Jackson, Josephine, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Tillamook, Washington, and Yamhill counties.

Counties identify the highest and best use forestland within their county. Highest and best use forestland is defined as land whose best, most economically productive use is to grow timber and other forest products. For these lands, the special assessment value equals the real market value. Therefore, there is no tax expenditure associated with them.

Designated forestland properties have a highest and best use as something other than forest use but are valued as if the land’s highest and best use was forestland. The owners of these properties have applied to the county for special designation as forestland. The application contains a signed statement that the owner intends to use this property for the primary purpose of growing and harvesting trees. Lands that do not continue to meet the requirements of this program will be disqualified and be required to repay up to five years’ worth of tax based on the difference between the tax calculated at the property’s specially assessed value and what would have been calculated using the property’s highest and best use value.

Small forestland owners (those who own 10 to 4,999 acres of forestland) have the option of participating in the program described in [2.138, Small Tract Forestland Option](#).

PURPOSE

According to ORS 321.262, the stated purposes of this expenditure are encouraging the growing and harvesting of timber, promoting the continuous production of forest products from private forestlands, and encouraging forestry and the restocking of forestlands to provide present and future benefits by enhancing the water supply, preventing erosion, providing habitat for wildlife, providing scenic and recreational opportunities, and providing for needed products.

WHO BENEFITS

Owners of designated forestland property. There are approximately 2.6 million acres of designated private forestland (specially assessed) in Western Oregon.

EVALUATION

Provided by the Oregon Department of Forestry

The program encourages retention of forestland for forest use. Owners must meet stocking standards of the Forest Practices Act or have a management plan to meet requirements. Owners pay assessment based on 100 percent of the value of land as forestland, so no severance tax is due at harvest.

Forestland owners delay timber harvests for an indeterminate period. During this period, noncommercial values that accrue to the public are maintained and increased, notably wildlife habitat, clean air, clean water, carbon sequestration, visual quality, etc.

2.137 EASTERN PRIVATE FORESTLAND

Oregon Statute: 321.833

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: \$620 million

	Revenue Impact	
	Loss	Shift
2023-25	\$14,700,000	\$1,300,000
2025-27	\$15,900,000	\$1,400,000

DESCRIPTION

Forestland is considered either: 1) highest and best use forestland or 2) designated forestland which is specially assessed. Value is determined for these specially assessed properties by the potential of the land to grow timber. Each acre of land in the state is assigned one of eight productivity classes based on the rate of growth of standing timber or the potential to grow timber; by statute forestland in eastern Oregon is assigned the lowest productivity class. Eastern Oregon includes Baker, Crook, Deschutes, Gilliam, Grant, Harney, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler counties.

Counties identify the highest and best use forestland within their county. Highest and best use forestland is defined as land whose best, most economically productive use is to grow timber and other forest products. For these lands, the special assessment value equals the real market value. Therefore, there is no tax expenditure associated with them.

Designated forestland properties have a highest and best use as something other than forest use but are valued as if the land's highest and best use was forestland. The owners of these properties have applied to the county for special designation as forestland. The application contains a signed statement that the owner intends to use this property for the primary purpose of growing and harvesting trees. Lands that do not continue to meet the requirements of this program will be disqualified and be required to repay up to five years worth of tax based on the difference between the tax calculated at the property's specially assessed value and what would have been calculated using the property's highest and best use value.

Small forestland owners (those who own 10 to 4,999 acres of forestland) have the option of participating in the program described in [2.138, Small Tract Forestland Option](#).

PURPOSE

According to ORS 321.262, the stated purposes of this expenditure are encouraging the growing and harvesting of timber, promoting the continuous production of forest products from private forestlands, and encouraging forestry and the restocking of forestlands to provide present and future benefits by enhancing the water supply, preventing erosion, providing habitat for wildlife, providing scenic and recreational opportunities, and providing for needed products.

WHO BENEFITS

Owners of designated forestland property. There are approximately 1.2 million acres of designated private forestland (specially assessed) in Eastern Oregon.

EVALUATION

Provided by the Oregon Department of Forestry

The program encourages retention of forestland for forest use. Owners must meet stocking standards of the Forest Practices Act or have a management plan to meet requirements. Owners pay assessments based on 100 percent of the value of land as forestland, so no severance tax is due at harvest.

Forestland owners delay timber harvests for an indeterminate period. During this period, noncommercial values, which accrue to the public, are maintained and increased, notably wildlife habitat, clean air, clean water, carbon sequestration, visual quality, etc.

2.138 SMALL TRACT FORESTLAND OPTION

Oregon Statute: 321.722

Sunset Date: None

Year Enacted: 2003

2023-24 Estimated Reduction in the Taxable Assessed Value: \$1.3 billion

	Revenue Impact	
	Loss	Shift
2023-25	\$29,900,000	\$5,900,000
2025-27	\$36,700,000	\$6,900,000

DESCRIPTION

Owners of 10 to 4,999 acres of Oregon forestland are provided the option of:

- Having their land specially assessed under [2.136, Western Private Forestland](#), or [2.137, Eastern Private Forestland](#), or
- Participating in the Small Tract Forestland Program. Under this program, forestland receives a specially assessed value equal to 20 percent of the specially assessed forestland value that designated forestland receives. When the timber is harvested, participants pay a severance tax.

This expenditure relates to the special assessment of the Small Tract Forestland Program.

PURPOSE

“The Legislative Assembly declares the purposes of the small tract forestland tax option program established under ORS 321.700 to 321.754 are to:

(a) Impose property taxes on forestland values that are annually determined and adjusted as described in ORS 321.201 to 321.222 and then specially assessed; and

(b) Impose a severance tax on the harvesting of timber from small tract forestland in order to:

(A) Recognize the long-term nature of the forest crop and foster the public policy of this state to encourage the growing and harvesting of timber;

- (B) Protect the public welfare by ensuring that the citizens of this state and future generations will have the benefits to be derived from the continuous production of forest products from privately held small tract forestland;
- (C) Promote the public policy of this state to encourage forestry and the restocking of forestlands in order to provide present and future benefits, including but not limited to water supply enhancement, erosion prevention, wildlife habitat, scenic and recreational opportunities and needed forest products;
- (D) Produce revenues for local taxing districts;
- (E) Match the incidence of taxation with the realization of the economic benefits of harvest; and
- (F) Encourage the establishment of new forests on denuded, nonstocked or underproducing forestland” (ORS 321.703).

WHO BENEFITS

Owners of small tracts of timberland who select this optional tax treatment. In 2023–24 there were approximately 610,000 acres assessed as small tract forestland and roughly 14,000 accounts.

IN LIEU

Participants in the Small Tract Forestland Program are subject to a severance tax paid when timber is harvested from the subject forestland. The tax raised approximately \$1.2 million in the 2021-23 biennium. The severance tax is designed to partially offset the expenditure impact caused by valuing the forestland at 20 percent of specially assessed forestland value. The severance tax rates are indexed annually in proportion to annual changes in small tract forestland assessed value. Revenues from the severance tax are distributed to the State School Fund, county General Funds, and the Community College Support Fund. Revenues are also used to reimburse the state’s General Fund for expenses incurred in the collection of small tract forestland taxes.

EVALUATION

Provided by the Oregon Department of Forestry

Similar to a predecessor land and privilege tax system, under the current approach, land is assessed at 20 percent of its specially assessed value as forestland, and the remainder of the tax is collected at harvest when the landowner has cash flow. The severance tax differs from the old privilege tax in that it is based on volume harvested not the value of the trees.

According to the Department of Revenue, the primary purpose of the Small Tract Forestland Program (STF) is to provide a cash flow protection mechanism for small woodland owners who are unable to manage their harvest rotation to match the cash flow between tax payments and harvest receipts on specially assessed forestland. Sixty percent of the STF program participants in Eastern Oregon individually own less than 100 acres. If this majority of program participants were not in this program they would pay approximately \$.38 more per acre per year in property tax and they would owe no severance tax at the point in which they harvested their timber. Based on the high percentage of small acreage accounts participating, and the subsequent low tax burden, the program appears to be used by a significant number of forestland owners for whom cash flow is not an issue. For the small acreage accounts, this tax expenditure does not meet its stated purpose.

The costs of this program, driven by the program requirements, is high relative to the population served consistent with the program purpose. Data of eligible taxpayers electing to use this program indicate that the program requirements could be greatly reduced and more narrowly targeted to meet just the needs of the target population. There are substantial administrative expenses for this program relative to the revenue generated by the severance tax.

2.139 WATERCRAFT LOCALLY ASSESSED

Oregon Statute: 308.256

Sunset Date: None

Year Enacted: 1925

2023-24 Estimated Reduction in the Taxable Assessed Value: \$190 million

	Revenue Impact	
	Loss	Shift
2023-25	\$5,300,000	\$1,200,000
2025-27	\$5,300,000	\$1,200,000

DESCRIPTION

Oregon statute provides special property tax treatment for a variety of types of watercraft. This tax expenditure includes multiple types of watercraft and ownership situations for watercraft that are not centrally assessed or licensed by ODOT.

Fully exempt watercraft include:

- Watercraft customarily engaged in the transportation of persons or property entirely outside of Oregon.
- Watercraft under construction or undergoing major remodeling. Major remodeling exists if the cost exceeds 10 percent of the value of the watercraft before remodeling.

Specially assessed watercraft include:

- Ships and vessels used on inland waters are specially assessed at 40 percent of assessed value.
- Ships and vessels used on the high seas or between the high seas and inland ports (coastal fishing boats, for example) are specially assessed at 4 percent of assessed value.
- Offshore self-propelled oil drilling rigs are also specially assessed at 4 percent of assessed value.

Some types of commercial watercraft are not exempt and are taxed at 100 percent of assessed value. These watercraft include dredges, museum ships, restaurant ships, and any vessel used for deep-sea fish reduction or processing (but not canning).

Small watercraft are included in [2.062, Small Watercraft](#). Centrally assessed watercraft are included in [2.118, Watercraft Centrally Assessed](#)

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to provide tax relief to Oregon's commercial fishing industry.

WHO BENEFITS

In 2023, the Oregon Department of Fish and Wildlife issued 946 resident and 455 non-resident commercial fishing boat licenses.

EVALUATION

Provided by the Oregon Department of Fish and Wildlife

This expenditure has achieved its purpose, although the exact proportion of fish landed outside Oregon waters is unknown. Many fishing vessels operate in distant water fisheries, but return to Oregon in the off-season.

2.140 DESTROYED OR DAMAGED PROPERTY

Oregon Statute: 308.146 and 308.425

Sunset Date: None

Year Enacted: 1971

2023-24 Estimated Reduction in the Taxable Assessed Value: \$15 million

	Revenue Impact	
	Loss	Shift
2023-25	\$400,000	Less than \$100,000
2025-27	\$400,000	Less than \$100,000

DESCRIPTION

Property that is destroyed or damaged may be eligible for special tax treatment. Under ORS 308.146, if property is destroyed or damaged between January 1 through June 30 by fire or an "act of God," the owner may apply to have the property assessed on the value of the property as of July 1. Normally, property is assessed on the value as of January 1. Taxpayers claiming this special treatment must file with the assessor before the later of August 1 that year or 60 days after the property was damaged or destroyed. Taxpayers can file late within the same assessment year by paying a late fee.

ORS 308.146 also calls for a property's maximum assessed value to be reduced when destruction or damage reduces the property's real market value. This treatment is not applicable to centrally assessed property nor damage to minor construction that had no impact on the property's maximum assessed value when added to the assessment roll.

If property is destroyed or damaged by fire or natural causes, then, under ORS 308.425, the property tax for the current tax year may be prorated on a monthly basis. Generally, the property owner must apply to receive the proration. Application for proration under this provision must be made by the end of the tax year or within 60 days after the property is damaged or destroyed, whichever is later. Legislation passed in 2021 (HB 2341) allows county tax collectors to provide this relief to properties affected by declared disasters without taxpayers having to apply, for tax years beginning on or after July 1, 2020.

If the property is destroyed or damaged, the monthly tax is 1/12 of the total tax for each month before damage and a percentage of the monthly tax for each month in the tax year that the property remains destroyed or damaged. The percentage used is the ratio of the value after damage to the value before damage.

According to ORS 308.440, none of the above benefits may be given to any person who is convicted of arson with regard to the property for which relief is sought.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to provide tax relief to those with a total or partial loss of use of the property due to fire or natural causes.

WHO BENEFITS

Property owners whose property is destroyed or damaged by fire or natural causes during the tax year.

EVALUATION

Not evaluated.

CHAPTER 3. GAS, USE, AND JET FUEL TAXES

Fuels used in motor vehicles (gasoline and use fuels) and airplanes (aviation gasoline and jet fuel) are taxed in Oregon. Use fuels are fuels other than gasoline or jet fuel used in motor vehicles, such as diesel, propane, and natural gas. Gasoline, use, and jet fuel taxes are among the transportation taxes in Oregon, in addition to the [Weight-Mile Tax on page 323](#), [Vehicle Use Tax on page 377](#), and others. In general, ongoing vehicle operation is subject to either fuel taxes or the weight-mile tax, but not both. Total revenue from the gasoline, use, and jet fuel taxes, accounted for by the Department of Transportation, is forecast to be \$1.39 billion in the 2023-24 biennium and \$1.38 billion in the 2025–27 biennium.

Most of this tax revenue is dedicated to the construction and maintenance of roads in Oregon. Aviation gasoline and jet fuel tax revenue is used to fund aviation programs.

Gasoline Tax

In 1919, Oregon became the first state to institute a user tax on gasoline. Effective January 1, 2024, the state of Oregon and the federal government impose taxes of 40 cents and 18.4 cents per gallon respectively, for a total tax rate of 58.4 cents per gallon. During the 2017 Session the Legislature passed HB 2017, increasing the state tax rate to 34 cents per gallon and establishing three additional two cent increases in 2020, 2022, and 2024 if certain conditions are met. The Department met the conditions for each of the two cent increases, occurring January 2020, January 2022, and January 2024. In addition to the state and federal taxes, two Oregon counties and several cities also assess local gasoline taxes, ranging from 1 to 10 cents per gallon. Oregon administers tax collection for 17 cities and two counties, while the gasoline taxes imposed by ten cities are administered by the local government. The state tax is paid to the Oregon Department of Transportation (ODOT) by the approximately 160 licensed wholesale fuel dealers in the state. The tax is then passed on to the consumer in the price paid at the pump. Depending on the use of the fuel, these taxes may be refunded to the consumer (see refunds section below for more information).

Use Fuel Tax

In 1943, Oregon imposed a tax on fuels other than gasoline used in motor vehicles. Diesel is the primary fuel, but other fuels used in motor vehicles such as biodiesel, propane, and natural gas are also taxed. At the time of publication, the state of Oregon and the federal government imposed taxes of 40 cents and 24.4 cents per gallon, respectively, on diesel and biodiesel for a total tax rate of 64.4 cents per gallon. As with gasoline, HB 2017 increased the rate to 34 cents per gallon and included the same three two-cent conditional increases. There are approximately 600 licensed retailers in the state who submit payments to ODOT for taxes collected from consumers of use fuels. In addition, there are another 1,000 users operating more than 3,700 vehicles that have obtained ODOT Use Fuel user licenses and pay the tax directly to the state rather than paying at the pump. The use fuel tax does not apply to trucks subject to weight-mile taxes. Some consumers of use fuels are exempted from the use fuel tax and may claim refunds for the tax paid. See refunds discussion below.

Gasoline and Other Fuel Tax Refunds

The state gasoline and use fuel taxes are intended to assess users of public roadways for a fair share of the related construction and maintenance costs for roads. State law allows an exception from these taxes in cases where the user does not benefit from the facilities or services funded by the imposed tax, or where an alternate method of payment has been established in lieu of the tax. Examples include gasoline used in or for: cleaning or dyeing, power take-off equipment, stationary gasoline engines, uses that do not propel vehicles on public highways, or gasoline or other fuels used on private property. Refunds may be claimed for taxes paid on gasoline or other fuels used in these ways. In some cases, consumers of gasoline or other fuels for highway transportation use may claim refunds when specifically allowed in statute. These highway use refunds are considered tax expenditures and are described in the following pages. Additional information about refunds is available from ODOT at www.oregon.gov/ODOT/CS/FTG/Pages/ft.aspx.

Aviation Fuel Tax

This tax is assessed in the same manner as the gasoline tax. The current rate is eleven cents per gallon, last increased two cents during the 2015 Legislative Session. A lower rate of three cents per gallon applies to jet fuel. As with the aviation fuel tax, this rate was increased two cents per gallon during the 2015 Legislative Session. When consumers purchase gasoline for use as aircraft fuel, they may be required to pay the full Oregon gasoline tax rate of 40 cents per

gallon at the time of purchase. In such cases, statute allows consumers to claim a refund of the extra 29 cents per gallon of tax paid.

3.001 FOREST PRODUCTS: GASOLINE

Oregon Statute: 319.320(1)(b) and (d)

Sunset Date: None

Year Enacted: 1945

Revenue Impact	
	Total
2023-25	\$0
2025-27	\$0

DESCRIPTION

A refund is allowed for tax paid on gasoline when used for the removal of forest products on certain public roads or for construction or maintenance of the roads used for such forest products removal. Only roads that are not state highways or city streets or are county roads approved by the county may be considered when calculating the fuel tax eligible for refund. An agreement with the Oregon Board of Forestry, the State Forester, the county, or an agency of the United States must authorize the use of the road. To qualify for refunds of tax on fuels used for county road use, the user is required to have the same authorization to use the road as above and is required to pay for construction or maintenance of the county road.

In some cases, construction of a specific roadway is necessary for the removal of forest products. This provision allows counties to contract with the users of a roadway for the maintenance and improvement of that specific section of roadway.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose for this expenditure is that, in most cases, the fuel and weight-mile taxes pay for the general use of the transportation system where tracking user damage to identifiable areas is difficult. In this case, however, the section of roadway over which heavy loads are moved is easily identified, and cost to the user can be more directly allocated to a specific section of roadway.

WHO BENEFITS

This provision does not appear to have been used in over 12 years. Potential beneficiaries include businesses that transport forest products to the extent that any required road maintenance costs are surpassed by the amount of refunds.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure is ineffective in achieving its purpose as the costs of construction or maintenance of a typical county road are higher than that of fuels taxes paid. Removal of forest products are typically performed on roads other than state highways, county roads, or city streets, and a tax refund is allowed for fuels used for this purpose under ORS 319.831(c). Two additional points are important for understanding why this exemption is not used. First, over time the equipment used to construct and maintain roads and to remove forest products have shifted to diesel as the motive power. Since the point of taxation of diesel is at the end use, this fuel can be purchased without having to pay the fuels tax. Second, the vehicles used to transport forest products will almost exclusively be subject to the weight-mile tax, which is the in lieu of tax for heavy vehicles.

Furthermore, contacts with the public works department of counties with major timber operations, the Forest Service, and timber industry representatives indicate that this provision is not well known.

3.002 FOREST PRODUCTS: OTHER THAN GASOLINE

Oregon Statute: 319.831(1)(c) and (g)

Sunset Date: None

Year Enacted: 1965

Revenue Impact	
	Total
2023-25	\$0
2025-27	\$0

DESCRIPTION

A refund is allowed for tax paid on fuels other than gasoline (such as diesel) when used for the removal of forest products on certain public roads or for construction or maintenance of the roads used for such forest products removal. Only roads that are not state highways or city streets or are county roads approved by the county may be considered when calculating the fuel tax eligible for refund. An agreement with the Oregon Board of Forestry, the State Forester, the county, or an agency of the United States must authorize the use of the road. To qualify for refunds of tax on fuels used for county road use, the user is required to have the same authorization to use the road as above and is required to pay for construction or maintenance of the county road.

In some cases, construction of a specific roadway is necessary for the removal of forest products. This provision allows counties to contract with the users of a roadway for the maintenance and improvement of that specific section of roadway.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose for this expenditure is that, in most cases, the fuel and weight-mile taxes pay for the general use of the transportation system where tracking user damage to identifiable areas is difficult. In this case, however, the section of roadway over which heavy loads are moved is easily identified, and cost to the user can be more directly allocated to a specific section of roadway.

WHO BENEFITS

This provision does not appear to have been used in over 12 years. Potential beneficiaries include businesses that transport forest products to the extent that any required road maintenance costs are surpassed by the amount of refunds.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure is ineffective in achieving its purpose as the costs of construction or maintenance of a typical county road are higher than that of fuels taxes paid. Removal of forest products are typically performed on roads other than state highways, county roads, or city streets, and a tax refund is allowed for fuels used for this purpose under ORS 319.831(c). Two additional points are important for understanding why this exemption is not used. First, over time the equipment used to construct and maintain roads and to remove forest products have shifted to diesel as the motive power. Since the point of taxation of diesel is at the end use, this fuel can be purchased without having to pay the fuels tax. Second, the vehicles used to transport forest products will almost exclusively be subject to the weight-mile tax, which is the in lieu of tax for heavy vehicles.

Furthermore, contacts with the public works department of counties with major timber operations, the Forest Service, and timber industry representatives indicate that this provision is not well known.

3.003 VEHICLE USED FOR TESTING EMISSIONS (GAS AND USE FUEL TAXES)

Oregon Statute: 825.475

Sunset Date: 12-31-2025

Year Enacted: 2015

Revenue Impact	
	Total
2023-25	\$0
2025-27	\$0

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A person operating a vehicle for the purpose of emissions research and development is exempt from the fuel taxes for that use. To qualify for the exemption, the person operating the vehicle must not be operating the vehicle as a for-hire carrier and the US Environmental Protection Agency must have provided an exemption with federal requirements for the same testing being conducted.

Currently, the only vehicles performing qualifying emissions testing are heavy trucks. These vehicles would not be subject to the fuel tax and would instead be subject to the weight-mile tax. See [4.003, Vehicle Used for Testing Emissions \(Weight-Mile Tax\)](#) for the same exemption for vehicles performing emissions testing applying to the weight-mile tax.

Legislation in 2019 (HB 2164) set a sunset date of December 31, 2025 for this provision.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose is "to avoid taxing research and compliance work."

WHO BENEFITS

Owners of motor vehicles being used to do emissions research and development.

EVALUATION

Provided by the Oregon Department of Transportation

The exemption from Gas and Use Fuel taxes for vehicles being used to test emissions is currently not being used by any light vehicles normally subject to this tax. The vehicles used for testing emissions are heavy trucks only, which are covered by [4.003, Vehicle Used for Testing Emissions \(Weight-Mile Tax\)](#).

3.004 FUEL FOR AIRCRAFT DEPARTING U.S.

Oregon Statute: 319.330(2)

Sunset Date: None

Year Enacted: 1953

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

A refund is allowed for tax paid on fuel used by international air carriers. Refund requests are presented to the Oregon Department of Transportation for tax collected on aircraft fuel used solely for aircraft operations from a point within the state of Oregon directly to a point not within any state of the United States.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to promote international airline travel to and from Oregon, and to make it financially attractive for airlines with international flights to operate from Oregon airports.

WHO BENEFITS

According to the Oregon Department of Transportation, few taxpayers use this provision.

EVALUATION

Not evaluated.

3.005 PUBLIC SERVICES

Oregon Statute: 319.831(1)(d-f), (h-k)

Sunset Date: None

Year Enacted: 1961

Revenue Impact	
	Total
2023-25	\$2,100,000
2025-27	\$2,100,000

DESCRIPTION

A refund is allowed for any tax paid on fuels other than gasoline when the fuels are used in the performance of a public service. State agencies, counties, incorporated cities and towns, rural fire protection districts, road assessment districts, and special districts (as defined in ORS 198) are allowed refunds for any use. Agencies of the United States are exempt under federal law. School and education service districts or their contractors may also claim refunds for fuels used in transporting students.

Vehicles exempt under this tax expenditure are not also exempt under the weight-mile tax expenditures [4.004, Elementary and Secondary School Vehicles](#) or [4.006, Government Owned or Operated Vehicles](#). Vehicles are subject to either the fuels tax or the weight-mile tax, but not both.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to avoid use fuel taxation among public entities and to avoid taxing public services that are funded through the tax.

WHO BENEFITS

Beneficiaries include state government, over 240 incorporated cities and towns, 36 counties, almost 200 school districts, 19 educational service districts, over 250 rural fire protection districts, and various other local districts and federal agencies.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure achieves its purpose. Cities, counties, and the State use diesel fuel substantially in conjunction with the construction and maintenance of roads. Revenues generated through the tax on such fuels are dedicated for this purpose and this provision reduces the processing of funds before returning them to public agencies to be used for this purpose. This is an effective continuation of established policies that avoid reciprocal taxation among public entities.

3.006 PUBLIC TRANSPORTATION

Oregon Statute: 267.570(2)

Sunset Date: None

Year Enacted: 1974

Revenue Impact	
	Total
2023-25	\$1,000,000
2025-27	\$1,000,000

DESCRIPTION

A refund is allowed for any tax paid on fuels other than gasoline when used in the operation of mass transit and transportation districts. Transit and transportation districts are treated the same as municipalities for purposes of claiming this exemption.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to lower the cost of providing public transportation services.

WHO BENEFITS

Three mass transit districts, seven transportation districts, and one county service district in the state provide public transportation service.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure achieves its purpose. Without this exemption, fares could be higher, which would decrease ridership, particularly by those from lower income groups and/or those with limited mobility.

CHAPTER 4. WEIGHT-MILE TAX

The weight-mile tax is one of the taxes that provide for the maintenance, operation, construction, and reconstruction of public highways in Oregon. Other taxes for that purpose include the [Gas, Use, and Jet Fuel Taxes on page 315](#) and the [Vehicle Use Tax on page 377](#). In general, ongoing vehicle operation is subject to either fuel taxes or the weight-mile tax, but not both. Heavy vehicles that are generally subject to the weight-mile tax are not subject to the use fuel tax. Revenue from the weight-mile tax is forecast to be \$932.2 million in the 2023–25 biennium and \$977.3 million in the 2025–27 biennium. This tax revenue is dedicated to the construction and maintenance of roads in Oregon.

This tax is imposed on heavy vehicles according to a combination of the number of axles and/or combined weight of the vehicle and the number of miles driven. Studies show that, although fuel consumption increases with vehicle size and weight, it does not increase proportionately with cost responsibility. Above 26,000 pounds registered weight, the overall weight and axle loads become important factors in determining requirements for the strength of pavements, bridges, and other structures. Therefore, a diesel fuel tax would not be an accurate measure of cost responsibility for heavy vehicles.

The tax rate schedule changes as the weight of the vehicle increases from 26,001 pounds to 105,500 pounds, and as the number of axles increases. Within each weight or axle group, a truck pays the stated amount multiplied by the number of miles the truck travels each year on Oregon public roads. The weight-mile tax schedules are based on results of cost responsibility studies that determine the fair share that heavy vehicles should pay for the maintenance, operation, and improvement of the state’s highway system.

The tax rates consist of separate schedules for vehicles with declared weights between 26,001-80,000 pounds (Tax Table A) and those operated under special permit with registered weights between 80,001-105,500 pounds (Tax Table B). The tax tables and additional information are posted at <https://www.oregon.gov/odot/Forms/Motcarr/9928-2024.pdf>.

Since 1947, the weight-mile tax schedules have been adjusted as the result of updated cost responsibility studies and revenue measures passed by the Legislature. The Office of Economic Analysis is responsible for producing the Highway Cost Allocation Study each biennium. The most recent edition of this study is available at www.oregon.gov/das/OEA/Pages/hcas.aspx.

4.001 FARMING OPERATIONS

Oregon Statute: 825.017(4) and 825.024

Sunset Date: None

Year Enacted: 1983

Revenue Impact	
	Total
2023-25	\$13,400,000
2025-27	\$13,600,000

DESCRIPTION

Vehicles used in conjunction with farming operations are exempt from the payment of weight-mile taxes if they meet certain conditions. This includes implements of husbandry and farm-related equipment as referenced in the two Oregon statutes cited.

Implements of husbandry are those vehicles and trailers used exclusively in agricultural operations. The definition for farm related equipment is more inclusive and identifies uses incidental to farming operations such as transportation of supplies and equipment, as well as the personal use of vehicles by the farmer and the farmer's family or employees.

Vehicles registered as farm equipment are used primarily off the road system, and in most cases, the transportation of such vehicles on the road is incidental to their use. Over 60 percent of the vehicles operated in conjunction with farming weigh fewer than 26,000 pounds and are not subject to weight-mile taxation. This provision applies only to those farm vehicles that exceed 26,000 pounds.

It should be noted that farm vehicles are subject to fuel taxes unless they are operated off the road system, in which case a refund is allowed under ORS 319.320(3). Because farm vehicles over 26,000 pounds pay fuel tax, they are not subject to weight-mile tax.

PURPOSE

The statutes that allow this expenditure do not explicitly state a purpose. Presumably, the purpose is to relieve farmers of the recordkeeping necessary to comply with the weight-mile tax and to recognize the partial or seasonal use of the transportation system by these users.

WHO BENEFITS

Per information from the U.S. Department of Agriculture and the ODOT Driver and Motor Vehicle Services Division, there were approximately 35,500 farming operations in the state and about 15,700 registered farm vehicles in 2022.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure appears to achieve its purpose. However, the benefit per farm is very small and probably does not provide a competitive edge for farming in Oregon. Of course, larger farming operations benefit according to the amount of equipment in operation.

4.002 FOREST PRODUCTS ON COUNTY ROADS

Oregon Statute: 825.017(8)

Sunset Date: None

Year Enacted: 1977

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

Vehicles used for the removal of forest products on a public road are exempt from the payment of weight-mile taxes. An agreement with the Oregon Board of Forestry, the State Forester, or an agency of the United States must authorize the use of the road and require the user to pay for or perform the construction or maintenance of the county road. In some cases, construction of a specific roadway is necessary for the removal of forest products. This provision allows counties to contract with the users of a roadway for the maintenance and improvement of the specific section of roadway used.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the rationale for this expenditure is that, in most cases, fuels and weight-mile taxes pay for the general use of the transportation system where tracking user damage to identifiable areas is difficult. In this case, however, the section of roadway over which heavy loads are moved is easily identified, and the cost imposed by the user can be more directly allocated to a specific section of roadway.

WHO BENEFITS

Potential beneficiaries include businesses that transport forest products to the extent that any required road maintenance costs are surpassed by the amount exempt.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure is ineffective in achieving its purpose as the costs of construction or maintenance of a typical county road would be higher than that of the weight-mile taxes paid.

Furthermore, contacts with the public works department of counties with major timber operations, the U.S. Forest Service, and timber industry representatives indicate that this provision is not well known.

4.003 VEHICLE USED FOR TESTING EMISSIONS (WEIGHT-MILE TAX)

Oregon Statute: 825.475

Sunset Date: 12-31-2025

Year Enacted: 2015

Revenue Impact	
	Total
2023-25	\$700,000
2025-27	\$200,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

A person operating a vehicle for the purpose of emissions research and development is exempt from the weight-mile tax for that use. To qualify for the exemption, the person must not be operating the vehicle as a for-hire carrier and the US Environmental Protection Agency must have provided an exemption with federal requirements for the same testing.

See [3.003, Vehicle Used for Testing Emissions \(Gas and Use Fuel Taxes\)](#) for the same exemption applying to the fuel taxes.

Legislation in 2019 (HB 2164) set a sunset date of December 31, 2025 for this provision.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose is "to avoid taxing research and compliance work."

WHO BENEFITS

Owners of motor vehicles being used to do emissions research and development.

EVALUATION

Provided by the Oregon Department of Transportation

This tax expenditure provides a continuation of an exemption from fuel tax and weight mile tax that was granted by the Oregon Department of Environmental Quality (DEQ) to test new heavy truck technology. The current exemption granted by DEQ could not be continued and the Department of Justice determined that there was no mechanism that allowed ODOT to provide a similar tax exemption. The provisions in HB 2465 (2015) provide the statutory means to continue testing heavy vehicle emissions in Oregon without paying fuel tax or weight-mile tax. In 2023, there were 23 trucks in this testing program operating about 1.56 million miles in Oregon per year.

4.004 ELEMENTARY AND SECONDARY SCHOOL VEHICLES

Oregon Statute: 825.017(1)

Sunset Date: None

Year Enacted: Pre-1953

Revenue Impact	
	Total
2023-25	\$2,900,000
2025-27	\$3,000,000

DESCRIPTION

Vehicles used by, or under contract with, any elementary or secondary school district are exempt from the payment of weight-mile taxes when engaged exclusively in transporting students to or from school or authorized school activities or those activities sponsored by a public university.

Vehicles exempt under this tax expenditure are not also exempt under the fuels tax expenditure [3.005, Public Services](#). Vehicles are subject to either the fuels tax or the weight-mile tax but not both.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the rationale is that weight-mile taxation is generally applied to for-hire commercial vehicles. School buses are either owned by a school district or a contractor supplying services to a school district and are therefore not for-hire vehicles. This provision reduces the record keeping and audit cost of the refund application process.

WHO BENEFITS

There are about 200 school districts operating more than 1,200 elementary and secondary schools. This provision applies only to school buses that exceed 26,000 pounds, the threshold weight for the weight-mile tax. Approximately 41 percent of the miles traveled by school buses are in weight classes equal to or less than 26,000 pounds.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure achieves its purpose. It reduces the cost of public education in Oregon by reducing the cost to school districts that would be necessitated by paying the weight-mile tax as well as complying with the record keeping and other compliance costs of the tax.

4.005 FIRE PROTECTION

Oregon Statute: 825.017(16)

Sunset Date: None

Year Enacted: 1977

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

Fire trucks and rescue vehicles designated as emergency vehicles by the Department of Transportation are exempt from the weight-mile tax when involved in emergency and related operations. This exemption also applies to the vehicles being moved to or from the work area.

Many fire protection vehicles are owned by units of government and are exempt from weight-mile taxes under [4.006, Government Owned or Operated Vehicles](#), however this exemption also applies to privately owned fire protection vehicles.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to lower the cost of providing fire protection services normally provided through public services, and to station additional water supply trucks near logging operations when deemed necessary by forestry officials.

WHO BENEFITS

Nongovernment owners of fire protection vehicles. Few are using this exemption.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure appears to achieve its purpose. These fire protection vehicles are very few in number and operate primarily off the highway system; they would not be subject to taxation, with the exception of the provision that allows movement to and from the work area. This provision is effective, as the cost associated with record keeping and weight-mile audit would likely exceed any revenue generated. This is a minimal investment in supporting activities to protect Oregon's forest resources.

4.006 GOVERNMENT OWNED OR OPERATED VEHICLES

Oregon Statute: 825.017(10)

Sunset Date: None

Year Enacted: 1947

Revenue Impact	
	Total
2023-25	\$800,000
2025-27	\$800,000

DESCRIPTION

Vehicles being used in the performance of public services are exempt from weight-mile taxes. Exempt vehicles include those owned or operated by the United States, the state of Oregon, or any county, city, town, or municipality in this state when owned or operated:

- as a carrier of property for hire
- by a transportation district

- by a county service district, or
- by an intergovernmental body that provides public transportation

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid reciprocal taxation among public entities when the tax revenue would be used largely for the same purpose as the activity being taxed (road construction and maintenance). For federal vehicles, the purpose is to comply with the U.S. Constitution, which prohibits states from taxing the federal government.

WHO BENEFITS

Beneficiaries include federal and state government, 241 incorporated cities and towns, 36 counties, and the U.S. Postal Service.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure achieves its purpose. Cities and counties, the major beneficiaries of this provision, operate equipment subject to this tax largely in conjunction with the construction and maintenance of roads. Revenue generated through this tax is dedicated for this purpose, and this provision reduces the processing of funds before returning them to public agencies to be used for this purpose. This is an effective continuation of established policies that avoid the reciprocal taxation of governing agencies.

4.007 PUBLIC MASS TRANSIT VEHICLES

Oregon Statute: 825.017(11)

Sunset Date: None

Year Enacted: 1977

Revenue Impact	
	Total
2023-25	\$8,100,000
2025-27	\$8,300,000

DESCRIPTION

Vehicles owned or operated by a mass transit district are exempt from weight-mile taxes.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to lower the cost of providing public transportation services.

WHO BENEFITS

Three mass transit districts, seven transportation districts, and one county service district in the state provide public transportation service.

EVALUATION

Provided by the Oregon Department of Transportation

This expenditure achieves its purpose. Without this exemption, fares could be higher, which would decrease ridership, particularly by those from lower income groups and/or those with limited mobility.

4.008 CHARITABLE ORGANIZATIONS

Oregon Statute: 825.017(13)

Sunset Date: None

Year Enacted: 1977

Revenue Impact	
	Total
2023-25	\$200,000
2025-27	\$200,000

DESCRIPTION

Vehicles owned or under contract with a charitable organization are exempt from payment of weight-mile taxes when engaged exclusively in performing transportation necessary to the operation of the charitable organization.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to help support services provided by charitable organizations.

WHO BENEFITS

Charitable organizations operating vehicles that are registered by weight. Few are using this exemption.

EVALUATION

Provided by the Oregon Department of Transportation

Although the benefit in this case is relatively small, this provision is believed to be effective in achieving its purpose. There are relatively few vehicles being operated by charitable organizations that exceed the 26,000 pound lower limit of the weight-mile tax rate schedules.

Charitable organizations are excluded from all provisions of Chapter 825 of the ORS, which include operating authority and regulatory requirements before deregulation. At the time this exemption was passed, the exclusion from the provisions of Chapter 825 would have granted such organizations greater operating freedom and may have been the original incentive to provide this exemption.

CHAPTER 5. CIGARETTE TAX

Cigarette distributors are required to pay a tax for the distribution of each cigarette in Oregon. The tax is imposed on the initial distribution and no additional tax is imposed for subsequent distributions.

The Oregon cigarette tax began in 1966. Generally, the tax is paid through the use of tax stamps that are purchased by the 29 Oregon licensed cigarette distributors (as of July 2024). Distributors may pay the tax at the time they purchase the stamps or defer the payment until the 20th of the month following the purchase.

In November 2020, Oregon voters passed Ballot Measure 108, increasing the Oregon tax per pack of 20 cigarettes from \$1.33 to \$3.33.

Cigarette tax net revenue for the 2023–25 and 2025–27 biennia are forecast to be \$602 million and \$591 million, respectively.

Following the payment of administrative, enforcement, and refund expenses, tax receipts are distributed as follows:

Tax Distribution Percentages	
Destination	Percentage
Oregon Health Authority	85.8%
General Fund	6.6%
Mental Health	4.5%
Tobacco Use Reduction Account	1.0%
Cities	0.7%
Counties	0.7%
Transportation	0.7%

5.001 SMALL QUANTITY BY CONSUMERS

Oregon Statute: 323.060

Sunset Date: None

Year Enacted: 1965

Revenue Impact	
	Total
2023-25	\$400,000
2025-27	\$400,000

DESCRIPTION

The use or consumption of untaxed cigarettes transported into Oregon as a single lot or shipment of no more than 199 cigarettes is not taxed. This exemption also applies to cigarettes obtained at exempted federal installations when the quantity obtained is no more than 199 cigarettes at one time.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid the administrative and compliance costs of taxing these small quantities.

WHO BENEFITS

Individuals who transport small quantities of untaxed cigarettes into Oregon or obtain them at federal installations in Oregon.

EVALUATION

Not evaluated.

5.002 FEDERAL AND VETERANS INSTITUTIONS (CIGARETTE)

Oregon Statute: 323.055

Sunset Date: None

Year Enacted: 1965

Revenue Impact	
	Total
2023-25	\$500,000
2025-27	\$500,000

DESCRIPTION

Oregon cigarette taxes are not imposed on the sale of cigarettes at these locations:

- United States Army, Air Force, Navy, Marine Corps, or Coast Guard exchanges and commissaries
- Navy or Coast Guard ships' stores
- Ships' stores maintained under federal bond
- The U.S. Department of Veterans Affairs
- Exchanges and commissaries run by the National Oceanic and Atmospheric Administration (NOAA) or the Public Health Service (PHS) of the U.S. Department of Health and Human Services.

Also, the sale or gift of federally tax-free cigarettes delivered directly from the manufacturer to a veterans' home, hospital, or domiciliary care facility are not taxed.

PURPOSE

To comply with federal law.

WHO BENEFITS

People eligible to purchase cigarettes at the above locations, such as members, retirees, and certain veterans of the U.S. Armed Forces, authorized family members, members of NOAA or PHS, and certain civilian employees.

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

CHAPTER 6. OTHER TOBACCO PRODUCTS TAX

An “other tobacco products” tax is imposed on the sale, storage, use, consumption, handling, or distribution of tobacco products other than cigarettes. Examples of other tobacco products are cigars, tobacco for chewing or smoking in a pipe, e-cigarettes, and other nicotine inhalant systems. The tax is imposed on the distributor at the time the distributor imports, produces, or ships the tobacco products into Oregon. As of July 2024, there were 335 licensed distributors of other tobacco products.

In November 2020, Oregon voters passed Measure 108, which raised the maximum tax per cigar from 50 cents to one dollar and added e-cigarettes and other nicotine inhalant systems to products taxed under the other tobacco products tax. In 2021, the Legislature passed Senate Bill 587, which prohibits the unlicensed sale of tobacco products and inhalant delivery systems and requires the Department of Revenue to issue licenses to qualified retailers of such items.

Other Tobacco Products Tax Rates		
Product	Rate	Min/Max
Moist Snuff	\$1.86 per ounce	Min: \$2.24 per retail container
All Other Products	65% of wholesale sales price	Max: \$1.00 per cigar

Other tobacco products tax net revenue for the 2023–25 and 2025–27 biennia are forecast to be \$166 and \$165 million, respectively. Distributions for 2025–27 are forecast to be:

- General Fund: \$56.1 million
- Oregon Health Plan: \$43.3 million
- Oregon Health Authority: \$55.0 million
- Tobacco Use Reduction Account: \$10.9 million

6.001 FEDERAL AND VETERANS INSTITUTIONS (OTHER TOBACCO PRODUCTS)

Oregon Statute: 323.515

Sunset Date: None

Year Enacted: 1985

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

The other tobacco products tax does not apply to tobacco products that are sold at United States Army, Air Force, Navy, Marine Corps, Coast Guard, National Oceanic and Atmospheric Administration (NOAA), or Public Health Service (PHS) of the United States Department of Health and Human Services exchanges and commissaries; Navy or Coast Guard ships' stores; U.S. Department of Veterans Affairs; or ships' stores maintained under federal bond.

PURPOSE

To comply with federal law.

WHO BENEFITS

Members and veterans of the U.S. Armed Forces, and members of NOAA or PHS who purchase other tobacco products at federal institutions.

EVALUATION

Provided by the Department of Revenue

This expenditure achieves its purpose of compliance with federal law.

CHAPTER 7. BEER AND WINE TAXES

A tax is imposed upon the privilege of engaging in business as a manufacturer or as an importing distributor of malt beverages or wines. The Oregon Liquor and Cannabis Commission (OLCC) collects the tax. The tax rate for manufacturing or importing malt beverages is \$2.60 per barrel of 31 gallons. The tax rate for manufacturing or importing wine is 65 cents per gallon on wines with 16 percent or less alcohol by volume, and an additional 10 cents per gallon on wines with more than 16 percent alcohol by volume. There is an additional two cents per gallon wine tax imposed on selling and delivering of wines, which goes directly to the Oregon Wine Board. Fifty percent of the remaining beer and wine taxes go to the Mental Health Alcoholism and Drug Services Account, and the other 50 percent into the OLCC Account and distributed as described below.

Beverages with more than 21 percent alcohol are exclusively distributed and sold by the state of Oregon. Amounts generated by the imposition of a \$0.50 per bottle surcharge are dedicated directly to the General Fund. The remaining net revenue from the sale of these beverages and from the portion of the wine and malt beverage tax that goes into the OLCC account are distributed as follows:

General Fund: 56%

Cities (by population): 20%

Cities (by formula): 14%

Counties (by population): 10%

Beer and wine tax revenue is forecast to be \$36.6 million for the 2023–25 biennium and \$36.6 million for the 2025–27 biennium.

A separate tax is imposed on the sale or use of all agricultural products used in a winery for making wine. The OLCC collects the tax. The tax rate for vinifera varieties (true or hybrid) is \$25 per ton. Revenue from the tax on grapes is forecast to be approximately \$3.4 million for the 2023–25 biennium. The tax rate for all other agricultural products used to make wine over 8.5 percent alcohol is \$0.021 per gallon.

7.001 SMALL WINERIES

Oregon Statute: 473.050(5)

Sunset Date: None

Year Enacted: 1977

Revenue Impact	
	Total
2023-25	\$3,700,000
2025-27	\$4,000,000

DESCRIPTION

This provision allows all U.S. wine manufacturers producing fewer than 100,000 gallons annually to exempt the first 40,000 gallons sold each year in Oregon from the wine privilege tax.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage the development of small wineries that produce fewer than 100,000 gallons annually.

WHO BENEFITS

Small wineries benefit in that they are able to sell their product more competitively. It is estimated that 5.5 million gallons will be claimed as tax exempt during the 2023–25 biennium. This is expected to increase to 6.0 million gallons exempted in the 2025–27 biennium.

EVALUATION

Provided by the Oregon Liquor and Cannabis Commission

This tax exemption achieves its purpose. It was enacted to help small Oregon wineries get established and allows these wineries enough profit to stay in business until they become large enough to compete with the established, high-volume wineries. In 1977, when the exemption was enacted, there were approximately 10 licensed wineries. Today, there are over 900 wineries in the state, and the industry is still growing. Nearly all of Oregon's wineries are small enough to qualify for the full tax exemption. Oregon wines have continued to show overall growth.

Oregon has gained the reputation of a quality wine producing state, which has added to the image and livability of the state and promotes tourism and hospitality. The growth of the Oregon wine industry has also caused growth in secondary markets such as vineyards, label design, bottling, and marketing.

Because of the exemption, the industry decided to dedicate some of the tax savings to establish and maintain the Oregon Wine Board. The board divides its resources between research and development and industry promotion. If this were not the case, the industry would be asking the Legislature for funding from General Fund dollars.

7.002 WINE MARKETING ACTIVITIES

Oregon Statute: 473.047

Sunset Date: None

Year Enacted: 2001

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

This provision allows a credit against the wine privilege tax for certain marketing activities as defined by the Oregon Wine Board. The marketing activities must not promote any specific brand or winery and must be approved by the Oregon Wine Board. The total credit is limited by an amount equal to 28 percent of the sum of: a) one hundred percent of the cost of qualified marketing activities to the extent the cost does not exceed the amount of tax owed for

manufacturing or importing fewer than 40,000 gallons of wine, and b) 25 percent of the tax owed for manufacturing or importing greater than 40,000 gallons of wine. The total credit may not exceed the tax liability of the manufacturer or importing distributor of wine. Small wineries (wineries producing fewer than 100,000 gallons a year) that sell fewer than 40,000 gallons a year do not pay privilege tax because they are already exempt by 7.001, [Small Wineries](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage marketing of the Oregon wine industry.

WHO BENEFITS

Large wineries, some small wineries (wineries selling more than 40,000 gallons of wine, but producing fewer than 100,000 gallons a year) and the Oregon wine industry could benefit.

EVALUATION

Provided by the Oregon Liquor and Cannabis Commission

No winery has claimed the credit through June 30, 2024.

7.003 OREGON GRAPES FOR WINE WITHOUT OREGON DESIGNATION OR AVA

Oregon Statute: 473.046

Sunset Date: 06-30-2027 (see description)

Year Enacted: 2019

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

Wineries purchasing grape products harvested in Oregon and used for wine produced within a federally approved American Viticultural Area (AVA) located partially within Oregon that does not use Oregon designations or use an American Viticultural Area located wholly within Oregon on its label or packaging, or in its advertising or marketing are exempt from the tax on sale or use of agricultural products by wineries.

This exemption applies to taxes on grape purchases made on or after July 1, 2021.

Because the legislation enacting this provision did not expressly provide a period of applicability for this tax expenditure, ORS 315.037(3) establishes that this tax expenditure shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year must begin before June 30, 2027.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing grape growers operating partially in Oregon that are subject to similar taxes in other states and are not benefiting or marketing their grapes as from Oregon.

WHO BENEFITS

Wineries making wine in certain American Viticultural Areas partially in Oregon that do not label the wine with an Oregon designation.

EVALUATION

Provided by the Oregon Liquor and Cannabis Commission

No information available.

CHAPTER 8. EMERGENCY AND CRISIS SERVICES TAXES

The 911 emergency communications tax was enacted in 1981 to help local governments pay for establishing, operating, or improving a 911 emergency reporting system. Originally, the tax was 3 percent of the monthly rate charged for basic exchange access services. In 1991, that rate was increased to 5 percent. From October 1, 1995 through December 31, 2019, the rate was 75 cents per line per month and applied to all forms of wired and wireless telecommunications services. HB 4055 (2014) amended the tax to enhance the administration and enforcement of existing law governing Voice over Internet Protocol (VoIP) and wireless prepaid phones with access to 911. After an initial transition period for the first part of 2015, fixed line VoIP subscribers paid 75 cents per line per month, and each retail transaction for a wireless prepaid phone (such as adding minutes) was taxed at a rate of 75 cents per transaction. Starting on January 1, 2020, the rate increased to \$1.00 per month or transaction, and then increased to \$1.25 per month or transaction on January 1, 2021. These rates are the result of HB 2449, enacted in 2019.

The tax for subscribers is paid quarterly by the telecommunication utilities and service providers, who collect the tax from subscribers on their monthly billings. The tax for prepaid phones is collected by retail sellers. The 911 emergency communications tax has been extended seven times since inception and under current law will sunset at the end of 2029.

The 911 emergency communications tax revenue for the 2023–25 and 2025–27 biennia is forecast to be \$160.5 million and \$165.7 million, respectively. Net revenue from the tax is distributed to cities and counties on a per capita basis to be used for their 911 emergency communications systems.

House Bill 2757, passed in 2023, established the 988 trust fund to improve the statewide coordinated crisis system which includes maintaining and improving the 988 suicide prevention and behavioral health crisis hotline. Beginning January 1, 2024, in addition to the 911 emergency communications tax, this bill imposes a 988 coordinated crisis services tax at the rate of 40 cents tax per line per month or transaction to all forms of wired and wireless telecommunications services. The 988 coordinated crisis services tax is scheduled to sunset at the end of 2029.

The 988 coordinated crisis services tax revenue for the 2025–27 biennium is forecast to be \$54.1 million. Net revenue from the tax is distributed to the Oregon Health Authority to be used for the improvement of the statewide coordinated crisis system.

8.001 STATE AND LOCAL SUBSCRIBERS

Oregon Statute: 403.205(1)

Sunset Date: None (The emergency and crisis services taxes sunset 12-31-2029.)

Year Enacted: 1981

Revenue Impact			
	911	988	Total
2023-25	\$8,700,000	\$2,800,000	\$11,500,000
2025-27	\$8,800,000	\$2,800,000	\$11,600,000

DESCRIPTION

State and local governments are exempt from the emergency communications tax and the coordinated crisis services tax. These governments include regional housing authorities exempt from state taxes under ORS 307.092.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid reciprocal taxation among public entities; to avoid taxing public services that are funded through the tax.

WHO BENEFITS

State and local governments. There are approximately 280,000 employees in state and local government.

EVALUATION

Not evaluated.

8.002 OREGON TELEPHONE ASSISTANCE PROGRAM

Oregon Statute: 403.205(2)

Sunset Date: None (The crisis services tax sunsets 12-31-2029.)

Year Enacted: 2023 (HB 2757)

Revenue Impact			
	911	988	Total
2023-25	Not Applicable	\$100,000	\$100,000
2025-27	Not Applicable	\$100,000	\$100,000

DESCRIPTION

Recipients of the Oregon Telephone Assistance Program (OTAP) benefit are exempt from the coordinated crisis services tax. To qualify for the OTAP, households must either have an income that is at or below 135 percent of the Federal Poverty Guidelines or participate in one of several qualifying assistance programs including but not limited to the Supplemental Nutrition Assistance Program, Medicaid, or Supplemental Security Income.

PURPOSE

The legislation creating this expenditure did not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2757 (2023), the policy purpose is "to support access to phone service for households that qualify for the Oregon [Telephone Assistance] Program."

WHO BENEFITS

Recipients of OTAP benefits.

EVALUATION

Provided by the Oregon Public Utility Commission

The statute provides tax relief for qualifying households with low incomes that participate in the OTAP. The tax expenditure reinforces the policy of the state that adequate, affordable residential telecommunication service is

available to all Oregonians. The effectiveness of the 988-tax expenditure is contingent upon OTAP participating service provider compliance.

8.003 FEDERAL SUBSCRIBERS

Oregon Statute: 403.205(1)

Sunset Date: None (The emergency and crisis services taxes sunset 12-31-2029.)

Year Enacted: 1981

Revenue Impact			
	911	988	Total
2023-25	\$900,000	\$200,000	\$1,100,000
2025-27	\$900,000	\$300,000	\$1,200,000

DESCRIPTION

The federal government is exempt from the emergency communications tax and the coordinated crisis services tax. Exempt entities include foreign government offices that are exempt from taxation by treaty provisions with the federal government, as well as certain federally chartered corporations (e.g. U.S. Postal Service, Amtrak, Federal Reserve Bank) specifically exempt from state income taxes by federal law.

PURPOSE

To comply with federal law.

WHO BENEFITS

The federal government as well as foreign government offices and exempt federally chartered corporations. There are about 28,000 federal employees in Oregon.

EVALUATION

Provided by the Department of Revenue

This tax expenditure meets its purpose of compliance with federal law.

8.004 INDIAN RESERVATION SUBSCRIBERS

Oregon Statute: 403.205(1)

Sunset Date: None (The emergency and crisis services taxes sunset 12-31-2029.)

Year Enacted: 1981

Revenue Impact			
	911	988	Total
2023-25	\$800,000	\$200,000	\$1,000,000
2025-27	\$800,000	\$300,000	\$1,100,000

DESCRIPTION

Tribal members on federally recognized reservations in Oregon are exempt from the emergency communications tax and the coordinated crisis services tax. They must be enrolled members of the tribe located on the reservation.

PURPOSE

To comply with federal law.

WHO BENEFITS

Tribal members on federally recognized reservations in Oregon.

EVALUATION

Provided by the Department of Revenue

This tax expenditure meets its purpose of compliance with federal law.

CHAPTER 9. CORPORATE ACTIVITY TAX

On May 16, 2019, Governor Kate Brown signed House Bill 3427 into law. The legislation established a “Fund for Student Success” funded by a new Corporate Activity Tax (CAT) imposed on all types of business entities.

The CAT is in addition to the state’s current corporate and personal income taxes. Revenue from the CAT is transferred to the Fund for Student Success and used for education spending. Receipts are forecasted to be \$2.80 billion in the 2023–25 biennium and \$3.15 billion in the 2025–27 biennium.

Starting on January 1, 2020, the tax is imposed for the privilege of doing business in the state. The CAT is measured on a business’s commercial activity: the total amount a business realizes from transactions and activity in Oregon. Certain items are excluded from the definition of commercial activity and, therefore, are not subject to the CAT. In addition, there is a 35 percent subtraction for certain business expenses. The CAT is applied to Oregon taxable commercial activity in excess of \$1 million. The tax is computed as \$250 plus 0.57 percent of Oregon taxable commercial activity of more than \$1 million.

9.001 SALES OF PRESCRIPTION DRUGS BY ELIGIBLE PHARMACIES

Oregon Statute: 317A.123

Sunset Date: 12-31-2025

Year Enacted: 2022

Revenue Impact	
	Total
2023-25	\$9,000,000
2025-27	\$4,600,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

Prescription drug sales from eligible pharmacies which have nine or fewer locations under common ownership in this state (excepting pharmacies that cater primarily to veterinary customers) are exempt from the corporate activity tax for tax years beginning on or after January 1, 2022, and before January 1, 2026.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact for SB 1524 (2022), the “policy purpose of the eligible pharmacy exclusion is to prevent the closure of community pharmacies due to the corporate activity tax.”

WHO BENEFITS

The eligible pharmacies described above.

EVALUATION

Not evaluated.

9.002 SUBCONTRACTOR LABOR PAYMENTS FOR RESIDENTIAL CONSTRUCTION

Oregon Statute: 317A.122

Sunset Date: 12-31-2025

Year Enacted: 2019

Revenue Impact	
	Total
2023-25	\$1,700,000
2025-27	\$900,000

NOTE: The revenue impact estimate includes the effect of the sunset.

DESCRIPTION

Certain payments for labor costs made from a general contractor to a subcontractor for single-family residential construction in Oregon are excluded from the corporate activity tax. The exclusion is for 15 percent of the labor costs paid to subcontractors by the general contractor.

Payments made from general contractors to subcontractors for materials, land, or permits are not excluded from taxation. Payments between subcontractors are also not excluded from taxation.

Single-family housing is defined in administrative rule as single-family detached or semidetached houses and townhouses or row houses that do not share utilities, heating, or air-conditioning across housing units, have no housing units constructed above or below, and are separated from any adjacent units by a ground-to-roof wall.

Legislation in 2019 (HB 2164) established that this exclusion applies to tax years beginning before January 1, 2026.

PURPOSE

The statute that allows this tax expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2164 (2019), the purpose of this credit is “to encourage the employment of subcontractors within the residential construction sector.”

WHO BENEFITS

General contractors on single-family residential construction who pay subcontractors. In tax year 2021, approximately 300 taxpayers benefitted from this exclusion.

EVALUATION

Provided by the Oregon Housing and Community Services Department

OHCS does not have any data to evaluate the effectiveness of the program.

9.003 PRECIOUS METALS

Oregon Statute: 317A.100(1)(b)(WW)

Sunset Date: None

Year Enacted: 2023 (HB 2073)

Revenue Impact	
	Total
2023-25	\$100,000
2025-27	\$200,000

DESCRIPTION

For purposes of the corporate activity tax, commercial activity does not include the cost paid by a dealer for items of precious metal. The difference between the amount received for the sale and the cost of precious metals continues to be included in commercial activity. An “item of precious metal” means an item of gold, silver, platinum, rhodium or palladium that has been put through a process of smelting or refining and that is in a state or condition such that its value depends on its contents and not its form.

The legislation that enacted this tax expenditure specified that any sunset under ORS 315.037 does not apply.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff revenue impact statement for HB 2073 (2023), “the policy purpose of the precious metals exemption is to create more equitable tax treatment between precious metals purchased as investments or used as a medium of exchange and similar assets such as stocks, bonds, and cash.”

WHO BENEFITS

Dealers of precious metals.

EVALUATION

Not evaluated.

9.004 INSURERS SUBJECT TO RETALIATORY TAX

Oregon Statute: 317A.100(4)(h)

Sunset Date: 12-31-2026 (see description)

Year Enacted: 2021

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

Foreign or alien insurance companies (those formed under the laws of a state other than Oregon or a country other than the United States, respectively) are exempt from the corporate activity tax to the extent that they are subject to Oregon's retaliatory tax under ORS 731.854 and 731.859.

Because the legislation enacting this provision did not expressly provide a period of applicability for this tax expenditure, ORS 315.037(3) establishes that this tax expenditure shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year is 2026.

PURPOSE

The statute that allows this tax expenditure does not explicitly state a purpose. Presumably, the purpose is to support Oregon-domiciled insurance companies by lowering the overall Oregon tax burden on non-Oregon insurance companies, since a high Oregon burden could trigger retaliatory taxes in other states.

WHO BENEFITS

Oregon-domiciled insurance companies paying taxes in lower-tax states that impose retaliatory taxes to equal what their domiciled companies would face in Oregon; foreign or alien insurance companies from lower-tax domiciles below the threshold for Oregon's retaliatory tax.

EVALUATION

Provided by the Department of Consumer and Business Services

Beginning with the first applicable tax year, 2021, this exemption from Oregon's corporate activity tax allows Oregon domiciled carriers to avoid increased retaliatory taxes levied by other states due to the decreased Oregon tax burden. Within certain thresholds, there should be no net reduction in Oregon's General Fund tax receipts because the corporate activity tax exemption on non-Oregon-domiciled carriers is offset to a significant degree by the increased retaliatory tax.

CHAPTER 10. ELECTRIC COOPERATIVE TAX

Mutual and cooperative electrical associations are subject to a tax on gross earnings that is in lieu of all other taxes on transmission and distribution lines. The associations must be nonprofit, and the principal purpose must be to distribute electricity to their members. (See 2.068, [Nonprofit Electrical Distribution Associations](#) for the related property tax expenditure.)

Per ORS 308.807, associations must pay the lesser of:

- Four percent of all gross revenue derived from the use or operation of transmission and distribution lines (exclusive of revenues from the leasing of lines to governmental agencies) minus the cost of power to the association, or
- The result of the following calculation, where RMV stands for real market value:

$$\begin{aligned} & ((\text{RMV of the transmission \& distribution lines}) \times (\text{max school rate allowed under ORS 310.150})) \\ & + ((\text{RMV of transmission \& distribution lines}) \times (\$10 \text{ per } \$1,000 \text{ of RMV})) \\ & + ((\text{RMV of transmission \& distribution lines}) \times (\text{bond tax rates per ORS 310.140})) \end{aligned}$$

For the 2024–2025 tax year, 15 associations paid an amount based on gross earnings and four paid the amount described in the second calculation.

The distribution of proceeds depends on which calculation method is used. If the first method is used, proceeds from the tax are distributed to counties in proportion to the association’s wire miles in each county. These payments are distributed one-third to the county school fund and two-thirds to the county general fund. If the second calculation method is used, payments are deposited in the unsegregated tax collections account and distributed according to the percentage distribution schedule in ORS 311.390.

Electric cooperative tax revenue is forecast to be \$23.1 million for the 2023–25 biennium and \$24.6 million for the 2025–27 biennium.

10.001 REVENUE FROM GOVERNMENT LEASED LINES

Oregon Statute: 308.805 and 308.807(1)

Sunset Date: None

Year Enacted: 1969

Revenue Impact	
	Total
2023-25	\$200,000
2025-27	\$200,000

DESCRIPTION

Revenue received by nonprofit mutual and cooperative electric distribution associations for leasing lines to the government is exempt from the total revenue when calculating the tax on gross earnings for the electric cooperative tax.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purposes are to encourage the leasing of lines to governmental agencies and reduce electric leasing costs to the government.

WHO BENEFITS

There are 19 cooperatives in Oregon subject to the tax; four of them received this exemption in tax year 2023–24.

EVALUATION

Not evaluated.

CHAPTER 11. OIL AND GAS PRIVILEGE TAX

A privilege tax is levied on the total volume of petroleum, crude oil, mineral oil, casinghead gas, and natural gas produced, or extracted, from a well within Oregon. The privilege tax is 6 percent of the gross value, or prevailing cash price, at the well for oil or gas produced. Net revenue derived from this tax is paid into the Common School Fund. To conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax programs that may affect at most a few taxpayers.

11.001 STATE AND LOCAL INTERESTS

Oregon Statute: 324.090(1)

Sunset Date: None

Year Enacted: 1981

Revenue Impact	
	Total
2023-25	Not Available*
2025-27	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer, but could at a later date.

DESCRIPTION

Any royalty or other interest in oil or gas owned by the state or a local government is exempt from the oil and gas privilege tax.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to adhere to the principle that governments typically do not tax themselves.

WHO BENEFITS

State and local governments.

EVALUATION

Not evaluated.

11.002 CREDIT FOR PROPERTY TAXES PAID

Oregon Statute: 324.090(2)

Sunset Date: None

Year Enacted: 1981

Revenue Impact	
	Total
2023-25	Not Available*
2025-27	Not Available*

* In certain cases, to conform with taxpayer privacy disclosure laws, revenue numbers are not provided for tax expenditures that may affect at most a few taxpayers. This includes tax expenditures that do not currently affect any Oregon taxpayer, but could at a later date.

DESCRIPTION

A credit is allowed against the oil and gas privilege tax for property taxes paid. This includes taxes on any property rights attached to the right to produce oil and gas, producing oil and gas leases, and machinery and equipment used in the operation of the well.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid double taxation of the value of oil and gas extracted.

WHO BENEFITS

Producers of natural gas in Oregon. As of August 2024, there are a total of 75 permitted wells in Columbia and Coos Counties. Not all permitted natural gas wells produce gas, and there are no actively producing oil wells in Oregon.

EVALUATION

Provided by the Department of Geology and Mineral Industries

This credit effectively avoids the double taxation of oil and gas resources that would occur if mining companies paid both property taxes and privilege taxes. If the companies were taxed through both the property tax and the privilege tax, the companies would pay tax twice on the same property.

CHAPTER 12. MEDICAL PROVIDER TAXES

The 2003 Legislature created the hospital assessment, long term care facility tax, and Medicaid managed care assessment, collectively referred to here as the Medical Provider Taxes. These taxes are used to finance Medicaid services and leverage additional federal funds. Only the hospital and long term care facility taxes are discussed here because they are the only ones with tax expenditures.

Hospital assessment

The assessment on each hospital subject to this assessment is imposed at a rate determined by the director of the Oregon Health Authority (OHA) and is revised as needed. The assessment rate used is the best estimate of the rate needed to fund identified services and costs. Currently, the assessment rate is 6.0 percent of net patient revenues for Type A and Type B hospitals and 6.0 percent of net patient revenues for other hospitals but has been as low as 0.15 percent.

The assessment applies to net revenues earned by hospitals before the earlier of September 30, 2025, or the date the assessment no longer qualifies for federal matching funds. Net proceeds from this assessment are deposited in the Hospital Quality Assurance Fund. These revenues are to be used to partially fund the Oregon Health Plan in the OHA budget. The OHA 2023-25 Legislatively Adopted Budget includes \$1.68 billion in hospital revenue in the Health Systems budget to partially fund the Oregon Health Plan. Hospital assessment receipts are forecast to be \$1.669 billion for the 2023-25 biennium and \$221.8 million for the 2025-27 biennium. The large decrease is because of the scheduled expiration of the assessments after one quarter of the 2025-27 biennium.

Hospital Assessment Rate History	
Period Beginning	Assessment Rate
July 1, 2004	0.95 percent
January 1, 2005	0.68 percent
July 1, 2006	0.82 percent
January 1, 2008	0.63 percent
July 1, 2009	0.15 percent
October 1, 2009	2.80 percent
July 1, 2010	2.32 percent
July 1, 2011	5.25 percent
October 1, 2011	5.08 percent
January 1, 2012	4.32 percent
April 1, 2013	5.30 percent
October 1, 2014	5.80 percent
April 1, 2016	5.30 percent
July 1, 2017	6.00 percent
October 5, 2017	5.30 percent
January 1, 2018	6.00 percent

Type A/B Hospital Assessment Rate History	
Period Beginning	Assessment Rate
January 1, 2018	4.00 percent
July 1, 2018	4.75 percent
July 1, 2019	4.20 percent
December 1, 2019	2.69 percent
January 1, 2020	5.50 percent
October 1, 2020	6.00 percent

Long term care facility tax

The assessment for this tax equals the rate times the number of patient days at the long term care facility for a calendar quarter. The Oregon Department of Human Services director typically establishes an annual assessment rate that applies for a 12-month period beginning July 1. The rate was initially \$8.25 and has increased to \$37.68 as of July 2024.

Net proceeds from this tax are deposited in the Long Term Care Facility Quality Assurance Fund. These revenues are intended to increase nursing facility Medicaid reimbursement rates and improve the financial stability of the nursing home industry. Long term care facility tax receipts are forecast to be \$154.4 million for the 2023-25 biennium and \$173.8 million for the 2025-27 biennium.

Long Term Care Facility Tax Rate History	
Period Beginning	Tax Rate
July 1, 2003	\$8.25
July 1, 2004	\$10.87
July 1, 2005	\$12.23
July 1, 2006	\$13.73
July 1, 2007	\$15.00
July 1, 2008	\$14.85
December 1, 2008	\$13.75
July 1, 2009	\$15.38
July 1, 2010	\$16.21
July 1, 2011	\$17.51
July 1, 2012	\$18.35
July 1, 2013	\$20.79
January 1, 2014	\$20.46
July 1, 2014	\$19.37
July 1, 2015	\$22.56
July 1, 2016	\$22.99
July 1, 2017	\$23.68
July 1, 2018	\$24.46
July 1, 2019	\$25.44
July 1, 2020	\$25.92
July 1, 2021	\$27.44
July 1, 2022	\$32.91
July 1, 2023	\$34.02
July 1, 2024	\$37.68

12.001 EXCLUDED HOSPITALS

Oregon Statute: 414.853(3)(b)

Sunset Date: None (The tax sunsets 09-30-2025 or at the cessation of federal matching funds.)

Year Enacted: 2003

Revenue Impact	
	Shift*
2023-25	\$382,000,000
2025-27	\$74,300,000

* There is no loss in revenue because the Oregon Health Authority sets the tax rate to achieve specific funding goals. However, the assessment liability of exempt hospitals is shifted to nonexempt hospitals.

DESCRIPTION

Hospitals that provide only psychiatric care, special inpatient care facilities, pediatric specialty hospitals providing care to children at no charge, public hospitals other than hospitals created by health districts, and hospitals operated by the United States Department of Veterans Affairs are exempted from paying the hospital assessment. HB 2010 in 2019 extended the period of applicability of the hospital assessment and this tax expenditure through September 30, 2025.

PURPOSE

The purpose of exempting hospitals operated by the US Department of Veterans Affairs is to comply with federal law, as federal entities are not subject to state taxation. The statute that allows this expenditure does not explicitly state a purpose for exempting the other facilities. Presumably, one purpose is to avoid taxing hospitals receiving little or no reimbursement from Medicaid. Such hospitals include pediatric specialty hospitals providing care to children at no charge, hospitals providing only psychiatric care, and special inpatient care hospitals. In the case of Oregon Health and Science University (OHSU), the Oregon Health Authority determined that the OHSU hospital could generate revenue in a different way while implementing a federally approved program.

WHO BENEFITS

Three US Department of Veterans Affairs hospitals, the Oregon State Hospital (provides only psychiatric care), Vibra Specialty Hospital (special inpatient facility providing long term acute care), and OHSU (public hospital not created by a health district).

EVALUATION

Provided by the Oregon Health Authority

If OHSU were not excluded from the hospital assessment, it would have paid an estimated \$292 million dollars for the 2023–25 biennium, and \$38 million for the 2025–27 biennium. The reduced amount in 2025-27 is due to the expiration of DRG [Diagnostic Related Group] hospital taxes on September 30, 2025. If the tax was ongoing throughout 2025-27 OHSU would pay \$323 million if not exempt. Beginning January 1, 2018, the OHA implemented a new program with OHSU that provides even greater benefit to the agency to meet its ongoing revenue targets.

If the Oregon State Hospital were not excluded from the hospital assessment, it would have paid an estimated \$1.2 million for the 2023–25 biennium and \$0.1 million for the 2025–27 biennium. If not for the expiration of tax programs on September 30, 2025 and Oregon State Hospital's exemption they would be required to pay \$0.9 million in 2025-27.

While Vibra and hospitals operated by Veterans Affairs do not report revenue information to OHA, and it cannot estimate the revenue impact for these hospitals, high level estimates are provided and included in the total impact by the Department of Revenue based on historical data.

Although OHSU is excluded from the assessment, OHA is now receiving funds from OHSU at even greater amounts than it paid under the assessment through an intergovernmental agreement. The funding from OHSU is used to meet OHA budget targets for the Oregon Health Plan and for the state share of federally-approved quality and access payments—which are eligible for Medicaid matching funds—to OHSU. As a result, both OHA and OHSU received increased benefit from excluding OHSU from the hospital assessment.

12.002 OREGON VETERANS' HOME

Oregon Statute: 409.803

Sunset Date: None (The tax sunsets 06-30-2026.)

Year Enacted: 2003

Revenue Impact	
	Shift*
2023-25	\$6,600,000
2025-27	\$3,700,000

* There is no loss in revenue because the Oregon Department of Human Services sets the tax rate to achieve specific funding goals. However, the tax liability of exempt long term care facilities is shifted to nonexempt long term care facilities.

DESCRIPTION

The two Oregon Veterans' Homes providing long term skilled nursing care in The Dalles and Lebanon, Oregon are exempt from the long term care facility tax. They are state owned and privately managed. HB 4162 in 2018 extended the period of applicability of the long term care facility assessment and this tax expenditure through June 30, 2026.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing a public entity

WHO BENEFITS

The Oregon Veterans' Homes and their residents and the spouses of residents.

EVALUATION

Not evaluated.

12.003 TYPE A AND B HOSPITALS

Oregon Statute: 414.855(3)(c)

Sunset Date: None (The tax sunsets 09-30-2025 or at the cessation of federal matching funds.)

Year Enacted: 2017

Revenue Impact	
	Shift*
2023-25	\$0
2025-27	\$0

* There is no loss in revenue because the Oregon Health Authority sets the assessment rate to achieve specific funding goals. However, the assessment liability of exempt hospitals is shifted to nonexempt hospitals.

DESCRIPTION

Prior to the passage of HB 2391 in 2017, Type A and B hospitals in Oregon were exempted from paying the hospital assessment. Now, they must pay the hospital assessment, but the director of the Oregon Health Authority (OHA) may impose a lower rate of assessment on them to take into account the hospitals' financial position. Type A hospitals have fewer than 50 beds and are more than 30 miles from another hospital. Type B hospitals have fewer than 50 beds and are fewer than 30 miles from another hospital. Type A and B hospitals are paid on a cost to charge ratio for Medicaid clients. HB 2010 in 2019 extended the period of applicability of the hospital assessment and this tax expenditure through September 30, 2025.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. During the development of the 2017–19 Legislatively Adopted Budget, OHA staff working with hospital representatives determined that Type A and B hospitals could be added to the hospital assessment, generating additional revenue to help meet the state's funding needs for the Oregon Health Plan and, under a new federally-approved program, OHA would make quality and access pool

payments to Type A and B hospitals to offset their cost of the assessment in aggregate. To meet a revenue target established during legislative budget negotiations, OHA calculated that a lower assessment rate on Type A and B hospitals would achieve the needed funding amount. Therefore, the Legislature approved HB 2391, giving the OHA Director the authority to impose a lower rate on Type A and B hospitals.

WHO BENEFITS

There are 12 Type A and 20 Type B hospitals, though none benefit from this tax expenditure since their assessment rate is the same as the regular hospital assessment rate.

EVALUATION

Provided by the Oregon Health Authority

Type A and B hospitals are projected to pay \$332 million for the 2023–25 biennium and \$40 million for the 2025–27 biennium. The reduction is due to the expiration of the tax program on September 30, 2025. If the tax did not expire A and B hospitals would be projected to pay \$324 million in the 2025-27 biennium.

Type A and B hospitals are currently paying 6.0% hospital tax rate, matching the rate assessed to DRG hospitals

Type A and B hospitals, in the aggregate, do not benefit and are not harmed by any specific assessment rate. OHA will adjust quality and access pool payments to Type A and B hospitals, in the aggregate, to be equal to amount of assessment revenue paid by Type A and B hospitals in the aggregate. The assessment rate is set by the director to meet the Oregon Health Plan funding target established in the 2023–25 Legislatively Adopted Budget and for making quality and access pool payments—which are eligible for Medicaid matching funds—to Type A and B hospitals to offset their cost of the assessment.

CHAPTER 13. LODGING TAX

The Oregon Legislature approved House Bill 2267 in 2003, which created the Oregon state transient lodging tax. The tax applies to the fee charged to a customer for overnight lodging. The tax rate was one percent from January 1, 2004 through June 30, 2016. From July 1, 2016 through June 30, 2020, the rate was 1.8 percent. Effective July 1, 2020, the rate is 1.5 percent. The revenue from this tax funds the Oregon Tourism Commission and its programs.

House Bill 2197, passed in 2005, expanded the definition of transient lodging, and expanded the list of those who must pay the tax. House Bill 2656, passed in 2013, enhanced the administration and enforcement of existing law governing transient lodging taxes. Legislative changes required transient lodging providers and transient lodging intermediaries to collect and remit taxes computed on the retail price paid by the customer for occupancy of transient lodging. These legislative changes became effective on October 7, 2013. House Bill 4146, passed in 2016, changed the tax rates and distribution of revenue. During the 2018 Legislative Session, House Bill 4120 expanded the definition of a transient lodging intermediary.

The lodging tax was designed to be a tourism and travel related tax, with a tax base that encompassed tourism and travel related transient lodging. The statutory implementation of the lodging tax encompasses a wider base of transient lodging, and then excludes certain non-travel and non-tourism lodging. For example, overnight stays in hospitals and other medical facilities could be subject to the tax if the statutory exemption did not exist. Lodging tax receipts are forecast to be \$89.7 million and \$99.1 million for the 2023–25 and the 2025–27 biennia, respectively.

13.001 EXEMPT DWELLING UNITS

Oregon Statute: 320.308

Sunset Date: None

Year Enacted: 2005

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

Certain facilities and dwelling units used for temporary lodging are exempt from state lodging taxation. Exempt facilities/units include:

- Health care or residential facilities licensed, registered, or certified by the Oregon Department of Human Services or the Oregon Health Authority
- Mental health and substance abuse treatment facilities
- Units used for temporary occupancy by the general public for fewer than 30 days per year, unless rented out using a platform of any kind provided by a transient lodging intermediary
- Emergency shelters funded through a government agency
- Nonprofit facilities
- Units occupied by the same person for 30 or more consecutive days.
- Generally, any barracks, quarters, or other facilities or space located on installations owned or managed by the Oregon Military Department that are used for temporary human occupancy by military-affiliated personnel.

The lodging tax was enacted with the intent for the tax base to comprise tourism and travel related transient lodging providers. Its statutory implementation included all transient lodging, and then subsequently excluded non-tourism and non-travel related lodging from the tax. This exclusion was probably included for statute writing simplicity reasons in defining the tax base.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to implement a tourism and travel related lodging tax program that does not apply to the exempted facilities.

WHO BENEFITS

Individuals who make use of exempt lodging facilities and the organizations that operate such facilities.

EVALUATION

Not evaluated.

13.002 LODGING PAID FOR BY THE FEDERAL GOVERNMENT

Federal Constitution: U.S. Constitution, Article VI, Clause 2

Sunset Date: None

Year Enacted: 2003 (tax enacted)

Revenue Impact	
	Total
2023-25	\$800,000
2025-27	\$800,000

DESCRIPTION

As a result of the supremacy clause in the U.S. Constitution, federal employees on official business are exempt from the state lodging tax when payment for lodging is made by a federal agency. Employees of federal instrumentalities are also exempt when on official business and when payment for lodging is made by the federal instrumentality or federal government. A federal instrumentality is an organization that assists in the performance of a government function, receives funding from the federal government, and is exempt from taxation. Examples of federal instrumentalities include federal credit unions and the American Red Cross.

PURPOSE

To comply with the U.S. Constitution, which prohibits states from taxing the federal government.

WHO BENEFITS

The federal government and federal instrumentalities.

EVALUATION

Provided by the Department of Revenue

This tax expenditure meets its purpose of compliance with federal law.

CHAPTER 14. LOCAL CONSTRUCTION TAX

In 2007, the Oregon Legislature passed into law Senate Bill 1036, allowing school districts to impose a tax on new construction based on the square footage of the new construction. The bill also allowed certain other local districts to impose a construction tax if the tax was in effect or was the subject of a public hearing before May 1, 2007. Senate Bill 1036 also restricted all other local construction taxes until January 2018, but this restriction was amended by the legislature in 2016.

The tax rate limitation and maximum tax are adjusted annually based on an average construction cost index. For fiscal year 2024–25, the tax rates are limited to \$1.63 per square foot for residential construction and 82 cents per square foot for other construction, with a maximum of \$40,800 per structure.

School districts may use construction tax proceeds only for capital improvements. After entering into intergovernmental agreements with the school district imposing the tax, the tax is collected by state or local governments responsible for issuing building permits. Up to four percent of tax revenues can be used to reimburse the state or local government's administrative fees associated with collecting the tax.

In 2016, the legislature passed Senate Bill 1533, which allowed cities and counties to impose construction taxes. Such taxes imposed on residential property may not exceed one percent of the permit value for residential construction permits. The revenue is devoted to developer incentives and affordable housing.

14.001 EXEMPT CONSTRUCTION

Oregon Statute: 320.173

Sunset Date: None

Year Enacted: 2007

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

Certain types of construction may not be subjected to local construction taxes. Exempt construction includes:

- Private school improvements
- Public improvements defined by ORS 279A.010
- Affordable housing meeting certain criteria
- Public or private hospital improvements
- Improvements to religious facilities primarily used for worship or education associated with worship
- Agricultural buildings as defined by ORS 455.315 (2)(a)
- Facilities that are operated by a not-for-profit corporation and that are long term care facilities (defined in ORS 442.015) or residential care facilities (defined in ORS 443.400)
- Continuing care retirement communities (defined in ORS 101.020).
- Residential housing being constructed on a lot or parcel of land to replace residential housing on the lot or parcel of land that was destroyed or damaged by wildfire or another declared state of emergency.

Legislation in 2021 (HB 2607) added residential housing being constructed to replace destroyed and damaged housing after a disaster to the list of exempt property types.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to avoid taxing construction activities that could be funded by the tax being imposed, and to encourage other types of preferred or protected construction activities.

WHO BENEFITS

Purchasers, owners, or developers of exempted building types.

EVALUATION

Not evaluated.

CHAPTER 15. ESTATE TRANSFER TAX

Oregon places a tax on the transfer of wealth to heirs and beneficiaries. For deaths on or after January 1, 2012, the Oregon estate transfer tax return must be filed if the gross estate is \$1,000,000 or more at the date of death. This filing threshold is not inflation adjusted. The Oregon estate transfer tax is tied to the federal estate tax as the federal tax existed on December 31, 2010.

For much of recent history Oregon had an inheritance tax that was tied directly to the federal estate tax in a form referred to as a “pick up tax.” That is, Oregon’s inheritance tax was equal to the maximum state inheritance tax credit allowed against the federal estate tax. In 2012, the Legislature changed the Oregon inheritance tax to the Oregon estate transfer tax that exists today.

Receipts for this tax are very volatile, depending on the circumstances of a small number of taxpayers. Generally, a few thousand returns are filed each year, though the majority of the total revenue comes from a small number of larger estates. There has been revenue growth in recent years reflecting, in part, Oregon’s population growth as well as growth in the value of assets comprising estates. Receipts from the estate tax are expected to be \$606.4 million in 2023–25 and \$598.5 million in 2025–27.

15.001 CONSERVATION EASEMENT

Oregon Statute: 118.010(3)

Sunset Date: None

Year Enacted: 2011

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

The value of land subject to a conservation easement can be excluded from the taxable estate, up to \$500,000.

For land to qualify, it must

- be located in the United States,
- be owned by the decedent or family member for the three years preceding the decedent's death,
- be associated with a conservation easement that is not solely for the purposes of historic preservation, and
- only allow minimal commercial use.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage the use of conservation easements which allow private landowners to conserve land and prevent its development while retaining ownership.

WHO BENEFITS

Beneficiaries of an estate that includes land subject to a conservation easement. Few taxpayers use this exclusion.

EVALUATION

Not evaluated.

15.002 MARITAL DEDUCTION

Oregon Statute: 118.010(3) and (8)

Sunset Date: None

Year Enacted: 2011

Revenue Impact	
	Total
2023-25	\$399,000,000
2025-27	\$399,000,000

DESCRIPTION

A deduction is available for the value of property passed from the decedent to a surviving spouse. The value of this property would then be taxed when the surviving spouse dies.

There are two different deductions available related to property passed to a surviving spouse.

Under 26 U.S. Code §2056, a marital deduction is allowed for the value of any interest in property which passes from the decedent to a surviving spouse if that interest is included in the value of the gross estate. To qualify, all income must be payable to the surviving spouse during their lifetime, and no one other than the surviving spouse can have any rights to income or principal during the lifetime of the surviving spouse. The Oregon Estate Transfer Tax borrows federal definitions for the federal taxable estate, thus this deduction is available for Oregon taxpayers. Oregon taxpayers may make a separate election for the marital deduction than that used for the federal estate tax.

In addition to the marital deduction, taxpayers may elect to qualify a trust or other property interest as Oregon special marital property (OSMP), which is treated similarly to the marital deduction. To qualify as OSMP, the principal or income must be accumulated or distributed to the surviving spouse during their lifetime, and no part of the trust or other property interest may be transferred to another person during the lifetime of the spouse. In the case that a trust or other property interest would otherwise qualify, but it allows principal or income distributions to those other than the surviving spouse, the executor may elect to set aside a share of the trust or property interest as a separate trust or property interest. The permissible distributees must consent to the election of the portion of the property as OSMP and must release any rights to the OSMP during the life of the surviving spouse. This election is irrevocable.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to treat a married couple as a single unit.

WHO BENEFITS

The surviving spouse of a decedent. In 2022, there were over 1,000 estate tax returns that used the spousal exclusion.

EVALUATION

Not evaluated.

15.003 NATURAL RESOURCE AND FISHING PROPERTY (DEDUCTION)

Oregon Statute: 118.145

Sunset Date: 12-31-2028 (see description)

Year Enacted: 2023 (SB 498)

Revenue Impact	
	Total
2023-25	\$23,400,000
2025-27	\$31,300,000

DESCRIPTION

An exemption from the value of a taxable estate is allowed for some estates with natural resource or commercial fishing properties located in Oregon. The maximum exemption allowed is \$15 million.

To qualify for this exemption, the decedent or any family member of the decedent must materially participate in farm business, forestry business or fishing business for at least 75 percent of the days of each of the five calendar years before and after death. The property must be transferred to one or more family member after the death and family members inheriting the property must also materially participate. A family member is a person within the third degree of relation to the decedent, by blood, marriage, adoption, civil union or domestic partnership.

Farm use property, forest use property, and farm or forest homesites qualify as natural resource property. Property used in commercial fishing operations or in the processing and marketing of those operations also qualifies. An estate claiming this exemption may not claim the credit allowed under [15.005, Natural Resource and Fishing Property \(Credit\)](#).

Additional tax may be imposed if during the 5 years following the decedent's death, the natural resource property for which an exemption is allowed is sold or transferred to a person other than a family member of the decedent, or if requirements for material participation are not met.

Because the legislation enacting this provision did not expressly provide a period of applicability for this tax expenditure, ORS 315.037(3) establishes that this tax expenditure shall apply for a maximum of six years beginning with the initial applicable tax year. In this case, the last applicable tax year is 2028.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the revenue impact statement describing SB 498 (2023), "The policy purpose of this measure is to alleviate the need for estates with natural resource property to sell assets to pay estate tax, facilitating the passage of property ownership to family members."

WHO BENEFITS

Family members of decedents who owned natural resource property at the time of death.

EVALUATION

Not evaluated.

15.004 CHARITABLE BEQUESTS

Oregon Statute: 118.010(3)

Sunset Date: None

Year Enacted: 2011

Revenue Impact	
	Total
2023-25	\$109,000,000
2025-27	\$109,000,000

DESCRIPTION

An unlimited deduction is allowed for estates that bequeath assets to charitable or religious organizations; federal, state, or local governments; or certain other nonprofit organizations. Such bequests must have been made during the decedent's lifetime or by will.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to encourage contributions to charitable organizations.

WHO BENEFITS

Beneficiaries of an estate that bequeaths assets to qualifying entities.

EVALUATION

Not evaluated.

15.005 NATURAL RESOURCE AND FISHING PROPERTY (CREDIT)

Oregon Statute: 118.140

Sunset Date: None

Year Enacted: 2007

Revenue Impact	
	Total
2023-25	Less than \$100,000
2025-27	Less than \$100,000

DESCRIPTION

A credit against estate taxes is allowed for some estates with natural resource or commercial fishing properties located in Oregon. The credit amount is determined by the value of the estate's natural resources property in Oregon. The maximum value of natural resource property on which the credit is calculated is \$7.5 million. The maximum adjusted estate value allowed for the credit is \$15 million. The natural resource property must comprise at least 50 percent of the total estate value to be eligible. This provision requires the decedent to have owned the property and its use to have been devoted to farm or forest purposes or commercial fishing businesses for five out of eight years immediately preceding the decedent's death. The property must be transferred to or held in trust by a family member under the same classification for five out of eight years immediately following the decedent's death, failing to meet this requirement results in repayment of the credit by the taxpayer in whole or part.

Farm use property, forest use property, and farm or forest homesites qualify as natural resource property. Property used in commercial fishing operations or in the processing and marketing of those operations also qualifies.

The credit amount is calculated as the tax that would have otherwise been due multiplied by the fraction of the natural resource property's value, up to \$7.5 million, out of the total value of the adjusted gross estate, up to \$15 million, provided that the fraction is at least one half. Zero credit is allowed if the total adjusted gross estate exceeds \$15 million.

SB 498 (2023) restricts this credit only to estates that do not claim an exemption under [15.003, Natural Resource and Fishing Property \(Deduction\)](#).

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the legislative staff measure summary describing HB 3618 (2008), “the policy goal is to preserve small natural resource based businesses by allowing family owners to pass businesses onto future generations.”

WHO BENEFITS

Family members of decedents who owned natural resource property at the time of death. For the most recent tax year available, 2022, a total of about 60 estate tax returns claimed this credit. The total amount of the credit claimed in this year was \$9.3 million.

EVALUATION

Provided by the Oregon Department of Agriculture

The Natural Resource and Fishing Property credit may be crucial in preserving Oregon’s natural resource-based businesses, particularly those that are family-owned. By offering relief from estate taxes, this provision may prevent the forced sale or fragmentation of agricultural, forestry, and fishing properties, which are often the primary assets of these businesses. This helps ensure that these properties remain in productive use, supporting the long-term sustainability of Oregon’s natural resource economy.

However, the credit’s limitations, particularly the \$7.5 million cap on eligible property value and the \$15 million estate value threshold, may present significant challenges for some families. As land values and the cost of maintaining natural resource businesses have risen, especially in regions with high real estate demand, the credit may not be sufficient to fully mitigate the estate tax burden for larger or more valuable properties. This could force heirs to sell portions of their land or other assets to cover tax liabilities, leading to the fragmentation of the property and potentially disrupting the continuity of the business.

15.006 SMALL FOREST OWNER FOREST CONSERVATION (ESTATE TRANSFER TAX)

Oregon Statute: 315.124

Sunset Date: None

Year Enacted: 2022

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

A credit for estate taxes is allowed for estates where the decedent held a certification for a credit under [1.429, Small Forest Owner Forest Conservation \(Income Tax\)](#) for qualifying timber harvests on land owned by the decedent. The qualifications for this credit follow the requirements of the personal income tax credit.

The credit amount that can be used by the estate is any amount of the credit that was certified, but not used to offset personal income taxes. The credit cannot be used in excess of the estate tax liability, but any remaining amount may be used by the heirs or devisees for their use on personal or corporate income taxes.

If the property used to claim this credit is subsequently harvested or otherwise violates the conservation restrictions required to be certified for the credit, then additional tax, interest, and penalties may apply.

The legislation that enacted this tax expenditure specified that any sunset under ORS 315.037 does not apply.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. The legislative staff revenue impact statement for SB 1502 (2022) states “the policy purpose of this credit is to provide small forestland owners with financial encouragement to adopt standard practice harvest restrictions.”

WHO BENEFITS

Estates of individuals who owned fewer than 5000 acres of forestland in the state and harvest fewer than 2 million board feet annually in accordance with the specific restrictions and avoid harvesting trees within riparian areas.

EVALUATION

Not evaluated.

15.007 SPECIAL VALUATION

Oregon Statute: 118.010(3)

Sunset Date: None

Year Enacted: 2011

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

In general, property is valued according to its "highest and best use". If an estate's property is being used for farming purposes or in a trade or business other than farming it may be valued according to its actual use. To qualify, all of the following conditions must be met:

- Fifty percent or more of the value of the estate consists of real or personal property which was being used for farming or business by the decedent or a family member and was passed from the decedent to a family member.
- Twenty five percent or more of the value of the estate consists of real property which was being used for farming or business by the decedent or a family member and was passed from the decedent to a family member.
- For at least five out of the eight years preceding the decedent's death, the real property must have been owned by the decedent or a family member, used for farming or business and there must have been material participation by the decedent or a family member in the operation of the farm or business.

The executor of the estate must elect to use special use valuation on the return, and enter into a written agreement with any person who has an interest in the property consenting to the election. For calendar year 2024, the maximum allowed decrease in the value of qualified real property from electing to use special use valuation is \$1,390,000.

Additional tax is imposed if, within 10 years after the decedent's death, the qualified heir disposes of the qualified property or ceases to use it for its qualified use. The qualified heir is personally liable for the additional tax imposed.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to preserve small businesses by allowing family owners to pass businesses onto future generations.

WHO BENEFITS

Family members of a decedent with a qualifying estate.

EVALUATION

Not evaluated.

CHAPTER 16. MARIJUANA TAX

Oregon’s marijuana tax is a 17 percent state tax combined with up to a 3 percent local tax, both applied to the retail price at the point of sale. The Department of Revenue collects the state tax and, for cities or counties that have requested it, the local tax.

Oregon voters approved Measure 91 in a statewide general election on November 4, 2014. The measure legalized the production, processing, delivery, possession, and sale of marijuana among adults for recreational purposes. A system for legalized medical marijuana in Oregon had been created previously with the approval of Measure 67 in 1998. The tax structure outlined in Measure 91 would have applied to marijuana producers, but in 2015 the Oregon Legislative Assembly replaced that structure with a tax applied at the point of retail sale.

Sales of recreational marijuana may only be made by recreational retailers licensed by the Oregon Liquor and Cannabis Commission (OLCC). The tax rate of 17 percent (up to 20 percent with a possible local option) has applied since January 2017 or the retailer’s first licensed date, whichever was earlier.

Marijuana tax receipts are forecasted to be \$313 million for the 2023–25 biennium and \$339 million for the 2025–27 biennium.

Net marijuana tax revenue exceeding \$11.25 million per quarter (adjusted annually for inflation beginning 2023) is directed to drug treatment and recovery services, according to Measure 110, approved by voters in November 2020. The first \$11.25 million in net revenue each quarter (\$45 million per year) is distributed by statutory formula to recipients such as the State School Fund, Oregon State Police, Oregon Health Authority, and participating cities and counties. The annual adjustment of the \$11.25 million quarterly threshold is due to House Bill 4056 (2022).

16.001 MARIJUANA PURCHASED FOR MEDICAL USE

Oregon Statute: 475C.678

Sunset Date: 12-31-2027

Year Enacted: 2016

Revenue Impact			
	State	Local	Total
2023-25	\$16,100,000	\$2,800,000	\$18,900,000
2025-27	\$16,300,000	\$2,900,000	\$19,200,000

DESCRIPTION

Retail sales of usable marijuana or marijuana items are not subject to the marijuana tax when made to people who hold a valid medical marijuana patient or caregiver card issued by the Oregon Health Authority. This tax exemption applies to both state and local marijuana taxes. Although the law exempting medical marijuana only became effective in 2016, medical marijuana was not taxed before that time either. The introduction of taxed recreational marijuana sales in 2016 led to an opportunity to distinguish between taxed and untaxed marijuana sales.

Legislation in 2021 (HB 2433) specified that this provision applies to sales of marijuana items occurring on or after January 1, 2016, and before January 1, 2028.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. According to the revenue impact statement prepared by legislative staff for HB 2433 (2021), the “policy purpose of this exemption is to preserve access to medical marijuana in a similar manner as it was available prior to the legalization of recreational marijuana.”

WHO BENEFITS

Medical marijuana cardholders who make retail purchases of usable marijuana or marijuana items and who have been authorized by the Oregon Health Authority to use marijuana in the treatment of a debilitating medical condition. Close to 15,000 people held a medical marijuana patient card as of May 2024, and nearly 6,000 people held a caregiver card.

IN LIEU

Medical marijuana cardholders must pay an annual fee for a medical marijuana card. Card fees for patients total approximately \$1.5 million annually. Approximately 38 percent of patients pay full price for the annual fee.

EVALUATION

Provided by the Oregon Health Authority

Registered medical marijuana patients pay an annual registration fee of \$200 or a reduced fee, between \$20-\$60, depending on their qualifying status. The fees paid by the patient support the administration of the medical marijuana program which includes registration of patients and regulatory oversight of medical marijuana grow sites and facilities. The patient fees supplant the need for a tax on medical marijuana products sold at retail locations since the fees pay for the administration of the program. The tax exemption from sales of medical marijuana to registered patients would alleviate the financial burden on patients with a medical necessity who already pay a fee to access medical marijuana.

CHAPTER 17. VEHICLE USE TAX

The vehicle use tax was created in 2017 by the Oregon Legislative Assembly (HB 2017) and imposed beginning January 1, 2018. It imposes a tax on vehicle purchasers who intend to use a motor vehicle in Oregon. The tax is 0.5 percent of the retail price of certain vehicles purchased. In general, vehicles covered by the tax are those never before registered in Oregon and with 7,500 or fewer miles on their odometer (if they have one). The tax does not apply to vehicles with a gross vehicle weight rating over 26,000 pounds.

Vehicles potentially subject to the tax include passenger vehicles, motorcycles, campers, buses, trucks, trailers (if required to be registered in Oregon), and commercial motor vehicles. The use tax is reduced by amounts paid for the [Vehicle Privilege Tax on page 381](#).

Gross receipts are forecasted by the Oregon Department of Transportation to be \$22.7 million and \$24.4 million for the 2023–25 and 2025–27 biennia, respectively. Net revenue from the vehicle use tax is distributed to the State Highway Fund.

17.001 CERTAIN VEHICLE MODIFICATIONS (VEHICLE USE TAX)

Oregon Statute: 320.400(2)(b)

Sunset Date: None

Year Enacted: 2018

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

This provision states the retail value of the following modifications are not included in the retail sales price used in calculation, under ORS 320.410(2), of the tax on the storage, use, or other consumption in Oregon of motor vehicles purchased at retail:

- Modifications to a taxable vehicle that are necessary for a person with a disability to enter or drive or to otherwise operate or use the vehicle.
- Customized industrial modifications to the chassis of a taxable vehicle (typically a medium-duty truck) that has a gross vehicle weight rating (GVWR) of at least 10,000 pounds and not more than 26,000 pounds.

The legislative intent of the vehicle use tax was not to include the retail value of these modifications in the definition of “retail sale price” of which the tax is based. Presumably, it was simpler to make a general definition of retail sales price and then state what it does not include.

Legislation in 2019 (HB 2592) removed any sunset under ORS 315.037 for all tax expenditures related to the transportation project taxes enacted in 2017.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to not include the retail value of these modifications in the retail sales prices used in calculation of the tax on the storage, use, or other consumption in Oregon of motor vehicles purchased at retail.

WHO BENEFITS

Persons who purchase a taxable vehicle with adaptive modifications and businesses who purchase taxable vehicles with customized industrial modifications.

EVALUATION

Not evaluated.

17.002 VEHICLES PURCHASED BY THE FEDERAL GOVERNMENT OR TRIBES

Federal Constitution: U.S. Constitution, Article VI, Clause 2

Sunset Date: None

Year Enacted: 2017 (tax enacted)

Revenue Impact	
	Total
2023-25	\$200,000
2025-27	\$200,000

DESCRIPTION

The State of Oregon is prohibited by the U.S. Constitution from taxing the federal government or tribal governments. Oregon cannot require the federal government or tribal governments to pay the vehicle use tax.

PURPOSE

To comply with federal law.

WHO BENEFITS

The federal government and tribal governments.

EVALUATION

Provided by the Department of Revenue

This tax expenditure achieves its purpose of compliance with federal law.

CHAPTER 18. VEHICLE PRIVILEGE TAX

The vehicle privilege tax was created in 2017 by the Oregon Legislative Assembly (HB 2017) and imposed beginning January 1, 2018. It imposes a tax on motor vehicle dealers for the privilege of selling vehicles in Oregon, where a dealer is defined as someone who is or would be required to obtain a vehicle dealer certificate in Oregon. The tax is 0.5 percent of the retail price of certain vehicles sold. In general, vehicles covered by the tax are those never before registered in Oregon and with 7,500 or fewer miles on their odometer (if they have one). The tax does not apply to vehicles with a gross vehicle weight rating over 26,000 pounds, nor to those with a resale certificate.

Vehicles potentially subject to the tax include passenger vehicles, motorcycles, campers, buses, trucks, trailers (if required to be registered in Oregon), and commercial motor vehicles. If the privilege tax is not paid for a vehicle intended to be used in Oregon, the [Vehicle Use Tax on page 377](#) applies.

Gross receipts of the vehicle privilege tax are forecasted by the Oregon Department of Transportation to be \$78.8 million and \$83.6 million for the 2023–25 and 2025–27 biennia, respectively. Net revenue from the vehicle privilege tax is distributed to the Zero-Emission Incentive Fund and to the Connect Oregon Fund. Effective January 1, 2023, the greater of \$12 million per year or 45 percent of annual gross tax receipts is transferred to the Zero-Emission Incentive Fund and remaining revenue is transferred to the Connect Oregon Fund.

18.001 CERTAIN VEHICLE MODIFICATIONS (VEHICLE PRIVILEGE TAX)

Oregon Statute: 320.400(2)(b)

Sunset Date: None

Year Enacted: 2018

Revenue Impact	
	Total
2023-25	Not Available
2025-27	Not Available

DESCRIPTION

This provision states the retail value of the following modifications are not included in the retail sales price used in calculation under ORS 320.405(2) of the tax imposed on each vehicle dealer for the privilege of engaging in the business selling taxable motor vehicles at retail in Oregon:

- Modifications to a taxable vehicle that are necessary for a person with a disability to enter or drive or to otherwise operate or use the vehicle.
- Customized industrial modifications to the chassis of a taxable vehicle (typically a medium-duty truck) that has a gross vehicle weight rating (GVWR) of at least 10,000 pounds and not more than 26,000 pounds.

The legislative intent of the vehicle privilege tax was not to include the retail value of these modifications in the definition of “retail sales price” of which the tax is based. Presumably, it was simpler to make a general definition of retail sales price and then state what it does not include.

Legislation in 2019 (HB 2592) removed any sunset under ORS 315.037 for all tax expenditures related to the transportation project taxes enacted in 2017.

PURPOSE

The statute that allows this expenditure does not explicitly state a purpose. Presumably, the purpose is to not include the retail value of these modifications in the retail sales prices used in calculation of the tax imposed on each vehicle dealer for the privilege of engaging in the business selling taxable motor vehicles at retail in Oregon.

WHO BENEFITS

Persons who purchase a taxable vehicle with adaptive modifications and businesses who purchase taxable vehicles with customized industrial modifications.

EVALUATION

Not evaluated.

18.002 VEHICLES SOLD AT AUCTION

Oregon Statute: 320.425(2)

Sunset Date: None

Year Enacted: 2017

Revenue Impact	
	Total
2023-25	\$100,000
2025-27	\$100,000

DESCRIPTION

A seller of otherwise taxable motor vehicles is not liable for the vehicle privilege tax with respect to vehicles sold at an event that lasts less than seven consecutive days, for which the public is charged admission and at which otherwise taxable motor vehicles are sold at auction.

Legislation in 2019 (HB 2592) removed any sunset under ORS 315.037 for all tax expenditures related to the transportation project taxes enacted in 2017.

PURPOSE

The statute that allows this tax expenditure does not explicitly state a purpose. Presumably, the purpose is to not tax vehicles sold at auction the same as vehicles sold at retail.

WHO BENEFITS

Dealers selling taxable motor vehicles at auctions. Presumably, examples of vehicles sold at auction could include collector/classic vehicles, repossessed vehicles, and damaged vehicles that have never been registered in Oregon.

EVALUATION

Not evaluated.

18.003 VEHICLES SOLD FOR OUT OF STATE USE

Oregon Statute: 320.425(1)

Sunset Date: None

Year Enacted: 2017

Revenue Impact	
	Total
2023-25	\$12,700,000
2025-27	\$14,300,000

DESCRIPTION

A seller of otherwise taxable motor vehicles is not liable for the vehicle privilege tax for vehicles sold to non-Oregon residents. Sales of otherwise taxable motor vehicles to a business for use primarily outside of Oregon are also exempt.

Legislation in 2019 (HB 2592) removed any sunset under ORS 315.037 for all tax expenditures related to the transportation project taxes enacted in 2017.

PURPOSE

The statute that allows this tax expenditure does not explicitly state a purpose. Presumably, the purpose is to not disadvantage Oregon dealers selling taxable motor vehicles to non-residents or businesses located out-of-state.

WHO BENEFITS

Dealers selling taxable motor vehicles for out-of-state use. On average, 250 dealers each quarter since the tax program's inception reported selling vehicles to nonresidents and 50 dealers per quarter reported selling vehicles to a business for use primarily outside of Oregon.

EVALUATION

Provided by the Oregon Department of Transportation

This tax expenditure appears to be successful. Similar to out-of-state dealers selling to Oregon residents, Oregon dealers would likely want to sell a vehicle at the most competitive total cost, and not assessing the Privilege Tax would reduce this total cost. The purchaser would then report the sale to their home jurisdiction and the appropriate tax would get paid at that time.

APPENDIX A: OREGON STATUTE REQUIRING TAX EXPENDITURE REPORT

Oregon Laws 1995, Chapter 746, known as the Budget Accountability Act, established the requirement for the Tax Expenditure Report. That law was incorporated into the Oregon Revised Statutes, and subsequently modified. Below is the 2023 edition of the ORS requiring the Tax Expenditure Report.

291.190 Short title. ORS 291.195, 291.201 and 291.203 may be cited as the Budget Accountability Act.

291.195 Policy for financial expenditure planning. (1) The Legislative Assembly hereby declares that the ability to make fiscally sound and effective spending decisions has been enhanced by requiring agencies and programs to develop performance measures and to evaluate all General Fund, State Lottery Fund and other expenditures in accordance with these performance measures. Fiscal pressure on this state requires even greater accountability and necessitates a review of the fairness and efficiency of all tax deductions, tax exclusions, tax subtractions, tax exemptions, tax deferrals, preferential tax rates and tax credits. These types of tax expenditures are similar to direct government expenditures because they provide special benefits to favored individuals or businesses, and thus result in higher tax rates for all individuals.

(2) The Legislative Assembly further finds that 76 percent of property in this state is exempt from property taxation and that income tax expenditures total billions of dollars per biennium. An accurate and accountable state budget should reflect the true costs of tax expenditures and should fund only those tax expenditures that are effective and efficient uses of limited tax dollars.

(3) The Legislative Assembly declares that it is in the best interest of this state to have prepared a biennial report of tax expenditures that will allow the public and policy makers to identify and analyze tax expenditures and to periodically make criteria-based decisions on whether the expenditures should be continued. The tax expenditure report will allow tax expenditures to be debated in conjunction with online budgets and will result in the elimination of inefficient and inappropriate tax expenditures, resulting in greater accountability by state government and a lowering of the tax burden on all taxpayers.

291.201 “Tax expenditure” defined for ORS 291.201 to 291.222. As used in ORS 291.201 to 291.222, “tax expenditure” means any law of the federal government or this state that exempts, in whole or in part, certain persons, income, goods, services or property from the impact of established taxes, including but not limited to tax deductions, tax exclusions, tax subtractions, tax exemptions, tax deferrals, preferential tax rates and tax credits.

291.202 Budget and tax expenditure report of Governor; department to assist in preparation. (1) Except as otherwise provided in ORS 291.222, the Governor shall prepare in each even-numbered year for the biennium beginning July 1 of the following year:

- (a) A Governor’s budget; and
- (b) A tax expenditure report.

(2) The Oregon Department of Administrative Services shall advise and assist the Governor in the preparation of the Governor’s budget and the tax expenditure report and shall perform any duties connected to the budget or report as the Governor requires.

(3) The Department of Revenue shall advise and assist the Governor in the preparation of the tax expenditure report.

291.203 Tax expenditure report by Governor. (1) Not later than November 10 of each even-numbered year, the Governor shall cause the tax expenditure report to be compiled and prepared for printing.

(2) In the tax expenditure report, the Governor shall:

- (a) List each tax expenditure;
- (b) Identify the statutory authority for each tax expenditure;
- (c) Describe the purpose of each tax expenditure;
- (d) Estimate the amount of revenue loss caused by each tax expenditure for the coming biennium;
- (e) List the actual amount of revenue loss in the preceding biennium for each tax expenditure or an estimate if the actual amount cannot be determined;

- (f) Determine whether each tax expenditure has successfully achieved the purpose for which the tax expenditure was enacted and currently serves, including an analysis of the persons that are benefited by the expenditure; and
- (g) Categorize each tax expenditure according to the programs or functions each tax expenditure supports.

291.214 Governor to prepare recommendations regarding certain tax expenditures. (1) The Governor, during the preparation of the Governor's budget and before its submission to the Legislative Assembly, shall identify each tax expenditure that has a full or partial sunset that, if allowed to take effect, will have a fiscal impact on the state or on school districts for the next biennium, and shall prepare a recommendation as to each tax expenditure identified under this paragraph that indicates the Governor's opinion on whether the full or partial sunset of the tax expenditure should be allowed to take effect as scheduled or should be revised to a different date.

(2) As used in this section:

- (a) "Full sunset" means any provision that completely eliminates an existing tax expenditure on a specified date.
- (b) "Partial sunset" means any provision that reduces the amount of an existing tax expenditure or that alters the eligibility requirements for the expenditure as of a specified date.

291.216 Governor's budget; when due; content. (1) The Governor's budget shall include a budget message prepared by the Governor, including recommendations of the Governor with reference to the fiscal policy of the state government for the coming biennium, describing the important features of the budget, embracing a general budget summary setting forth the aggregate figures of the budget so as to show a balanced relation between the total proposed expenditures and the total anticipated income, with the basis and factors on which the estimates are made, the amount to be borrowed, and other means of financing the estimated expenditures for the ensuing biennium, compared with the corresponding figures for at least the last completed biennium and the current biennium.

(2) The Governor's budget shall be supported by explanatory schedules or statements, classifying the expenditures reported in the budget, both past and proposed, by organization units, objects and funds, and the income by organization units, sources and funds, and the proposed amount of new borrowing as well as proposed new tax or revenue sources, including a single comprehensive list of all proposed increases in fees, licenses and assessments assumed in the budget.

(3) The Governor's budget shall be submitted for all dedicated funds, as well as the state General Fund, and shall include the estimated amounts of federal and other aids or grants to state agencies or activities provided for any purpose whatever, together with estimated expenditures therefrom.

(4) The Governor's budget shall embrace the detailed estimates of expenditures and revenues. It shall include:

(a) Statements of the bonded indebtedness of the state government, showing the actual amount of the debt service for at least the past biennium, and the estimated amount for the current biennium and the ensuing biennium, the debt authorized and unissued, the condition of the sinking funds and the borrowing capacity.

(b) The Governor's recommendations concerning tax expenditures identified under ORS 291.214.

(c) Any statements relative to the financial plan which the Governor may consider desirable or which may be required by the Legislative Assembly.

(5) The Governor's budget shall use the estimated revenues under ORS 291.342 for the fiscal year in which the budget is submitted as the basis for total anticipated income under subsection (1) of this section, subject to adjustment as may be necessary to reflect accurately projections for the next biennium.

(6)(a) The Governor's budget shall present information regarding the expenses of the state in the following categories:

(A) Personnel expenses, including compensation and benefits for state employees, but excluding costs of services contracted out and temporary service costs.

(B) Supplies, equipment and the costs of services contracted out.

(C) Special payments.

(D) Capital construction.

(E) Capital outlay.

(F) Debt service.

(b) For each category described in paragraph (a) of this subsection, the budget shall show actual expenditures for the prior biennium and estimated expenditures for the current biennium.

(c) As supplemental information to the budget, the Governor shall include an estimate of the projected costs of continuing currently authorized programs in the next biennium. The estimate shall include, but is not limited to the projected costs of:

(A) Removing one-time expenditures;

(B) Program phase-ins and phase-outs;

(C) Personnel expenses compared to existing compensation plan agreements, including position vacancy experience calculations;

(D) Inflation for services, supplies and medical costs;

(E) Transfers between state funds or accounts;

(F) Mandated caseload changes; and

(G) Debt service for previously issued debt.

(d) The budget shall show the total increase in the cost of salaries and benefits for all state positions.

(7) The Governor's budget shall include:

(a) The total number of positions and full-time equivalent positions included in the budget.

(b) The average vacancy rate in the present biennium.

(c) The number of permanent, full-time equivalent vacancies as of July 1 of even-numbered years.

(8) The Governor's budget shall include computations showing budget figures as a percentage of the total General Fund, federal fund, fee or other source category, as may be appropriate.

(9) The Governor's budget shall include, in a format that provides side-by-side comparison with the State Debt Policy Advisory Commission report of net debt capacity, a six-year forecast, by debt type and repayment source, of:

(a) That portion of the capital construction program required to be reported by ORS 291.224 that will be financed by debt issuance.

(b) The acquisition of equipment or technology in excess of \$500,000 that will be financed by debt issuance.

(c) Other state agency debt issuance for grant or loan purposes.

(10) The Governor's budget shall include the outcomes-based budgeting information required by ORS 291.217 (2) and (3).

(11) The Governor's budget shall include recommendations regarding available funds that could be used to make lump sum payments to the Public Employees Retirement System under ORS 238.229.

(12) The Governor's budget shall include a narrative summarizing the racial impact statements required under ORS 291.206.

291.218 Printing Governor's budget and tax expenditure report; transmitting to members of legislature; distribution.

Except when the Governor under whose supervision the Governor's budget and the tax expenditure report have been prepared will be succeeded in office in January next following:

(1) The Oregon Department of Administrative Services shall have as many copies of the Governor's budget and the tax expenditure report printed as the Governor directs.

(2) Not later than December 1 of each even-numbered year, the Governor shall transmit a copy of the Governor's budget and the tax expenditure report to each member of the Legislative Assembly who is to serve during the next regular session of the Legislative Assembly.

(3) Upon request, the Governor shall distribute copies of the Governor's budget and the tax expenditure report free of charge to public libraries, schools and state officials. The Governor shall make copies available to the general public at a reasonable charge for each copy.

291.220 Furnishing information and assistance to legislature. (1) The Governor, upon request, shall furnish the Legislative Assembly any further information required concerning the Governor's budget and the tax expenditure report.

(2) The Oregon Department of Administrative Services, upon request, shall furnish a representative to assist the Legislative Assembly, the Joint Committee on Ways and Means and the Legislative Revenue Officer in the consideration of the budget, the tax expenditure report and any accompanying measures.

291.222 Furnishing information and assistance to Governor-elect; revision of budget and tax expenditure report. If the Governor under whose supervision the Governor's budget and tax expenditure report have been prepared will be succeeded in office in January next following:

(1) The Oregon Department of Administrative Services shall make available to the Governor-elect so much as the Governor-elect requests of the information upon which the Governor's budget and tax expenditure report are based, and upon completion of the budget and tax expenditure report, shall supply the Governor-elect with a copy of the budget and report, but may not print or distribute the budget or report. The department shall also make available to the Governor-elect all facilities of the department reasonably necessary to permit the Governor-elect to review and become familiar with the budget or tax expenditure report.

(2) After a review of the Governor's budget and tax expenditure report, the Governor-elect may prepare revisions and additions to the budget or report. The Oregon Department of Administrative Services and the Department of Revenue shall assist, upon request, in the preparation of any revisions or additions.

(3) The Oregon Department of Administrative Services shall have printed as many copies of the revised Governor's budget and revised tax expenditure report as the Governor-elect requests.

(4) Not later than February 1 of each odd-numbered year, the Oregon Department of Administrative Services shall transmit a copy of the revised Governor's budget and revised tax expenditure report to each member of the Legislative Assembly.

(5) Upon request, the department shall distribute copies of the revised Governor's budget and revised tax expenditure report free of charge, under any rules the department may adopt, to public libraries, schools and state officials. The department shall make copies of the revised budget and revised tax expenditure report available to the general public at a reasonable charge for each copy.

APPENDIX B: CONTRIBUTORS

The report was developed by the following members of the Department of Revenue Research Section, with assistance from numerous Department of Revenue and other state agency personnel:

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The following agencies evaluated the effectiveness of the tax expenditures and provided other important information:

Agriculture, Oregon Department of	Human Services, Oregon Department of
Aviation, Department of	Land Conservation and Development, Department of
Business Development Department, Oregon	Lands, Department of State
Chief Financial Office	Legislative Revenue Office
Consumer and Business Services, Department of	Liquor and Cannabis Commission, Oregon
Early Learning and Care, Department of	Lottery, Oregon
Emergency Management, Oregon Department of	Marine Board, Oregon State
Energy, Oregon Department of	Military Department, Oregon
Environmental Quality, Department of	Office of Economic Analysis
Film and Video Office, Oregon	Parks and Recreation Department, Oregon
Fish and Wildlife, Oregon Department of	Public Utility Commission, Oregon
Forestry, Oregon Department of	Rural Health, Office of
Geology and Mineral Industries, Department of	Secretary of State, Oregon
Health Authority, Oregon	Transportation, Oregon Department of
Higher Education Coordinating Commission	Veterans' Affairs, Oregon Department of
Housing and Community Services Department, Oregon	

APPENDIX C: NEW, MODIFIED, OR REMOVED TAX EXPENDITURES

This appendix contains a list of tax expenditures that have been created, modified, or removed since the publication of the *2023-25 Tax Expenditure Report*. Although many of the tax expenditures reflected here were created or changed during Oregon's 2023 or 2024 Legislative sessions, several are on this list because the Department has changed its interpretation of whether certain provisions represent tax expenditures or because they were included or excluded from the previous publication in error. The *2023-25 Tax Expenditure Report* provides descriptions of the removed items listed below.

The listing of modified tax expenditures below does not include modifications of tax expenditures that resulted from changes in federal law for income taxes that impact Oregon's income taxes.

Tax Expenditure	Type	Oregon Legislation Creating or Modifying Tax Expenditure	
NEW TAX EXPENDITURES			
<i>Personal & Corporate Income Taxes</i>			
1.054	Deferral of Certain Advance Payments	Exclusion	ORS 316.048 & 317.013
1.317	Personal Casualty Loss	Subtraction	HB 2812 (2023)
1.318	Wildfire Judgment or Settlement and Legal Fees	Subtraction	SB 1520 (2024)
1.412	Oregon Kids Credit	Credit	HB 3235 (2023)
1.426	Qualified Research Expenses for Semiconductor Companies	Credit	HB 2009 (2023)
1.427	Publicly Supported Housing Seller's Credit	Credit	HB 2071 (2023) & SB 1526 (2024)
<i>Property Tax</i>			
2.031	New ADU or Newly Converted Multiplex	Full	SB 919 (2023)
2.084	Solar Improvement on Tribal Land	Full	SB 1526 (2024)
2.115	Affordable Housing Projects Receiving Grant	Partial	SB 1537 (2024)
2.128	Homes Rebuilt After 2020 Wildfires	Special	SB 1545 (2024)
<i>Emergency and Crisis Services Taxes</i>			
8.002	Oregon Telephone Assistance Program	Exclusion	HB 2757 (2023)
<i>Corporate Activity Tax</i>			
9.003	Precious Metals	Exclusion	HB 2073 (2023)
<i>Estate Transfer Tax</i>			
15.001	Conservation Easement	Exclusion	ORS 118.010(3)
15.002	Marital Deduction	Deduction	ORS 118.010(3)
15.003	Natural Resource and Fishing Property (Deduction)	Deduction	SB 498 (2023)
15.004	Charitable Bequests	Deduction	ORS 118.010(3)
15.007	Special Valuation	Other	ORS 118.010(3)

Tax Expenditure		Type	Oregon Legislation Creating or Modifying Tax Expenditure
MODIFIED TAX EXPENDITURES			
<i>Personal & Corporate Income Taxes</i>			
1.314	First-time Home Buyer Savings	Subtraction	SB 1527 (2024)
1.329	Military Active Duty and Related Pay	Subtraction	HB 2071 (2023)
1.401	Employer Provided Scholarships	Credit	HB 2071 (2023)
1.403	Opportunity Grant Fund Contributions	Credit	SB 129 (2023)
1.405	Contributions to 529 Account	Credit	HB 2071(2023)
1.408	Rural Medical Practice	Credit	HB 4010 (2024)
1.409	Volunteer Rural Emergency Medical Providers	Credit	HB 2071 (2023)
1.411	Contributions to ABLE Account	Credit	HB 2071 (2023)
1.414	Agriculture Workforce Housing Construction	Credit	HB 2071 (2023)
1.415	Film Production Development Contributions	Credit	HB 2093 (2023)
1.419	Reservation Enterprise Zone (Income Tax)	Credit	HB 2071 (2023)
1.420	Public University Venture Development Fund	Credit	HB 2071 (2023)
1.423	Individual Development Account Donation (Credit)	Credit	HB 2071 (2023)
1.429	Small Forest Owner Forest Conservation (Income Tax)	Credit	HB 2161 (2023)
1.438	Fish Screening Devices	Credit	HB 2071 (2023)
1.439	Short Line Railroad Rehabilitation	Credit	HB 2071 (2023), HB 3406 (2023), & SB 1526 (2024)
1.441	Political Contributions	Credit	HB 2071 (2023)
1.442	Oregon Cultural Trust	Credit	HB 2071 (2023)
<i>Property Tax</i>			
2.012	Construction in Process in an Enterprise Zone	Full	HB 2009 (2023)
2.013	Enterprise Zone Businesses	Full	HB 2009 (2023)
2.014	Long Term Rural Enterprise Zone (Property Tax)	Full	HB 2009 (2023)
2.016	New Industrial Property in Rural Areas	Full	HB 2080 (2023)
2.022	Federal Land Under Recreation Facility	Full	HB 2080 (2023)
2.032	Food Processing Equipment	Full	HB 2080 (2023)
2.033	Farm Machinery and Equipment	Full	HB 4111 (2024)
2.100	Strategic Investment Program	Partial	HB 2009 (2023)
2.101	Cap on Central Assessment for Certain Companies	Partial	HB 2080 (2023)
2.103	Certain Single-Unit Housing	Partial	HB 2080 (2023), HB 4063 (2024), & SB 1526 (2024)
2.105	Multi-Unit Rental Housing in Designated Areas	Partial	HB 2080 (2023)
2.106	Low Income Multi-Unit Rental Housing	Partial	HB 2080 (2023)
2.107	Property for Low-Income Rental	Partial	HB 2080 (2023)
2.109	New or Rehabilitated Multi-Unit Rental Housing	Partial	HB 2080 (2023)
2.111	Disabled Veterans or Surviving Spouses of Veterans	Partial	HB 2080 (2023)
2.114	Affordable Housing Covenant	Partial	SB 1526 (2024)
2.116	Alternative Energy Systems	Partial	HB 2080 (2023)
2.121	Surviving Spouse of Public Safety Officer	Partial	HB 2080 (2023)

Tax Expenditure	Type	Removal Reason
REMOVED TAX EXPENDITURES		
<i>Personal & Corporate Income Taxes</i>		
Special Benefits for Disabled Coal Miners	Exclusion	JCT Threshold Update
ABLE Account Earnings	Exclusion	JCT Threshold Update
Magazine, Paperback, and Record Returns	Exclusion	JCT Threshold Update
Agriculture Cost-Sharing Payments	Exclusion	JCT Threshold Update
Cancellation of Debt for Farmers	Exclusion	JCT Threshold Update
Earnings of Certain Environmental Settlement Funds	Exclusion	JCT Threshold Update
Nonprofits Gain from Brownfield	Exclusion	JCT Threshold Update
Certain Payments to Controlling Exempt Organizations	Exclusion	JCT Threshold Update
Public Safety Officer Survivor Annuities	Exclusion	JCT Threshold Update
Research and Development Costs	Deduction	Federal Legislative Change
Cash Accounting for Agriculture	Deduction	JCT Threshold Update
Development Costs for Nonfuel Minerals	Deduction	JCT Threshold Update
Energy Efficient Commercial Property	Deduction	JCT Threshold Update
Special Depreciation for Recycling Equipment	Deduction	JCT Threshold Update
Mining and Solid Waste Reclamation Reserves	Deduction	JCT Threshold Update
Land Donated to Schools	Subtraction	Sunset
Qualified Research Activities	Credit	Sunset
Qualified Research Activities (Alternative)	Credit	Sunset
Electronic Commerce Enterprise Zone (Income Tax)	Credit	Sunset
Production or Collection of Biomass	Credit	Sunset
Alternatives to Field Burning	Credit	Sunset
Pollution Control	Credit	Sunset
Reforestation	Credit	Sunset
<i>Property Tax</i>		
Certain Property Owned by a Port	Full	Sunset
Transfer of Cemetery Land for Low-Income Housing	Full	Sunset
<i>Corporate Activity Tax</i>		
Manufactured Dwelling Cooperatives	Exclusion	Not a Tax Expenditure
Milk Sales by Dairy Farmers Who are not Members of an Agricultural Cooperative	Exclusion	Not a Tax Expenditure
<i>Vehicle Use Tax</i>		
Tax Paid to Another Jurisdiction	Exclusion	Not a Tax Expenditure

APPENDIX D: PERSONAL AND CORPORATE INCOME TAX EXPENDITURES

Of Oregon's 167 income tax expenditures, some apply exclusively to individuals, some apply exclusively to corporations, and some may be claimed by both individuals and corporations. The table below provides a summary of the income tax expenditures and their revenue impacts, and categorizes them by whether they apply exclusively to personal income taxes, exclusively to corporate income taxes, or to both.

INCOME TAX EXPENDITURE ESTIMATES BY TYPE OF TAXPAYER FOR 2025-27 (\$MILLIONS)

Expenditure Type	Individuals Only		Corporations Only		Both Individuals and Corporations		
	Number	Revenue Impact*	Number	Revenue Impact*	Number	Revenue Impact* (Individuals)	Revenue Impact* (Corporations)
Exclusions	40	\$9,012	3	\$48	11	\$278	\$130
Adjustments	7	\$520	0	\$0	0	\$0	\$0
Deductions	6	\$1,983	2	\$110	15	\$622	\$81
Subtractions	22	\$3,333	1	\$3	7	\$2	\$19
Credits	15	\$1,489	2	\$1	28	\$73	\$82
Other	4	\$266	2	\$1	2	\$5	\$0

*For reasons explained in [Revenue Impacts on page 3](#), there are difficulties with summing tax expenditures. This table is intended only to provide rough orders of magnitudes for large groups of tax expenditures and caution should be exercised when adding revenue impacts.

The table on the following pages lists all income tax expenditures and their revenue impacts, categorized into those that apply to personal income taxes and those that apply to corporate income taxes.

PERSONAL INCOME TAX EXPENDITURES

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
<i>Federal Exclusions</i>						
1.001	Scholarship and Fellowship Income	Education	1954	316.048	34,000	38,000
1.002	Qualified Education Savings (Federal)	Education	1996	316.048	41,000	43,000
1.003	Exclusion of Employer-Provided Tuition Reduction	Education	1984	316.048	2,000	2,500
1.004	Certain Foster Care Payments	Human Services	1982	316.048	4,000	4,000
1.005	Employee Adoption Benefits	Human Services	1996	316.048	Less than 500	Less than 500
1.006	Compensatory Damages	Human Services	1918	316.048	16,000	15,000
1.007	Employer Paid Medical and Cafeteria Plan Benefits	Human Services	1918 and 1978	316.048	1,800,000	1,800,000
1.008	Pension Contributions and Earnings	Human Services	1921	316.048	3,100,000	3,900,000
1.009	Social Security Benefits (Federal)	Human Services	1938	316.048	898,000	972,000
1.010	Regional Economic Development Incentives	Economic/Community	1993	316.048, 317.013	Less than 500	Less than 500
1.011	Capital Gain Invested in Opportunity Zone	Economic/Community	2017	316.048, 317.013	20,000	2,500
1.012	Exclusion of Gain from Certain Small Business Stock	Economic/Community	1993	316.048	78,000	77,000
1.013	Imputed Interest Rules	Economic/Community	1984	316.048, 317.013	7,500	8,000
1.014	Employer Provided Dependent Care	Economic/Community	1981	316.048	7,000	9,000
1.015	Capital Gains on Home Sales	Economic/Community	1997	316.048	450,000	470,000
1.016	Income Earned Abroad by U.S. Citizens	Economic/Community	1926	316.048	50,000	51,000
1.017	Cancellation of Mortgage Debt	Economic/Community	2007	316.048	1,500	Less than 500
1.018	Employer Paid Group Life Insurance Premiums	Economic/Community	1920	316.048	35,000	36,000
1.019	Employer Paid Accident and Disability Insurance	Economic/Community	1954	316.048	54,000	57,000
1.020	Employer Provided On-Site Gyms	Economic/Community	1984	316.048	16,000	15,000

PERSONAL INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.021	Miscellaneous Fringe Benefits	Economic/Community	1984	316.048	82,000	81,000
1.022	Employee Meals and Lodging (Nonmilitary)	Economic/Community	1918	316.048	89,000	83,000
1.023	Employee Stock Ownership Plans	Economic/Community	1974	316.048, 317.013	24,000	23,000
1.024	Employee Awards	Economic/Community	1986	316.048	4,000	4,000
1.025	Employer Provided Education Benefits	Economic/Community	1978	316.048	14,000	11,000
1.026	Spread on Acquisition of Stock	Economic/Community	1981	316.048	9,500	10,000
1.027	Meal and Entertainment Expenses	Economic/Community	1962	316.048	7,500	8,000
1.028	Veterans' Benefits and Services	Economic/Community	1917	316.048	160,000	170,000
1.029	Military and Dependents TRICARE Insurance	Economic/Community	1925	316.048	98,000	110,000
1.030	Cash Accounting, Other than Agriculture	Economic/Community	1916	316.048, 317.013	16,000	15,000
1.031	Inventory Methods of Valuation	Economic/Community	1938	316.048, 317.013	2,000	2,000
1.032	Energy Conservation Subsidies (Federal)	Natural Resources	1992	316.048	500	500
1.034	Employer Paid Transportation Benefits	Transportation	1984	316.048	53,000	52,000
1.035	Certain Disaster Mitigation Payments	Consumer and Business Services	2005	316.048, 317.013	1,000	500
1.038	Workers' Compensation Benefits (Medical)	Consumer and Business Services	1918	316.048	37,000	44,000
1.039	Workers' Compensation Benefits (Nonmedical)	Consumer and Business Services	1918	316.048	25,000	23,000
1.040	Gain on Nondealer Installment Sales	Tax Administration	1921	316.048, 317.013	8,500	7,500
1.041	Gain on Like-Kind Exchanges	Tax Administration	1921	316.048, 317.013	98,000	86,000
1.042	Allowances for Federal Employees Abroad	Government	1943	316.048	4,000	4,000
1.043	Interest on Oregon State and Local Debt	Government	1913	316.048	40,400	41,600
1.044	Voluntary Employees' Beneficiary Associations	Social Policy	1928	316.048	16,000	16,000
1.045	Rental Allowances for Clergy Housing	Social Policy	1921	316.048	7,500	7,500
1.046	Discharge of Certain Student Loan Debt	Social Policy	1984	316.048	12,000	6,500

PERSONAL INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.047	Capital Gains on Inherited Property	Social Policy	1921	316.048	690,000	730,000
1.048	Capital Gains on Gifts	Social Policy	1921	316.048	49,000	40,000
1.049	Life Insurance Proceeds	Social Policy	1913	316.048, 317.013	120,000	130,000
1.050	Disability Benefits of Military and Victims of Terrorism	Social Policy	1942	316.048	3,000	3,500
1.051	Benefits and Allowances of Armed Forces Personnel	Social Policy	1925	316.048	64,000	66,000
1.052	Combat Pay	Social Policy	Pre-1945	316.048	6,500	7,500
1.053	Deferral of Interest on Savings Bonds	Social Policy	1951	316.048	4,000	3,500
1.054	Deferral of Certain Advance Payments	Federal Law	2017	316.048, 317.013	3,500	3,500
<i>Federal Adjustments</i>						
1.101	Teacher Classroom Expenses	Education	2002	316.048	1,900	1,900
1.102	Interest on Student Loans	Education	1997	316.048	18,200	38,000
1.103	Self-Employment Health Insurance	Human Services	1986	316.048	83,000	84,600
1.104	Health Savings Accounts	Human Services	2003	316.048	92,000	110,000
1.105	IRA Contributions and Earnings	Human Services	1974	316.048	220,000	280,000
1.106	Moving Expenses	Economic/Community	1964	316.048	100	3,500
1.107	Overnight Travel Expenses of National Guard and Reserve Members	Social Policy	2003	316.048	2,000	2,000
<i>Federal Deductions</i>						
1.201	Medical and Dental Expenses	Human Services	1942	316.695	255,000	288,000
1.202	Removal of Architectural Barriers	Human Services	1976	316.048, 317.013	Less than 500	Less than 500
1.203	Deduction of Certain Film and Television Production Costs	Economic/Community	2004	316.048, 317.013	Less than 500	Less than 500
1.204	Accelerated Depreciation of Certain Buildings	Economic/Community	1954	316.048, 317.013	2,500	2,000
1.205	Accelerated Depreciation of Equipment	Economic/Community	1954	316.048, 317.013	36,000	Less than 500

PERSONAL INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.206	Section 179 Expensing Allowances	Economic/Community	1958	316.048, 317.013	38,000	39,000
1.207	Amortization of Business Start-Up Costs	Economic/Community	1980	316.048, 317.013	1,000	1,500
1.209	Accelerated Depreciation of Rental Housing	Economic/Community	1954	316.048, 317.013	31,000	22,000
1.210	Home Mortgage Interest	Economic/Community	1913	316.695	962,000	1,010,000
1.211	Property Taxes	Economic/Community	1913	316.695	587,000	656,000
1.212	Soil and Water Conservation Expenditures	Natural Resources	1954	316.048, 317.013	500	500
1.213	Fertilizer and Soil Conditioner Costs	Natural Resources	1960	316.048, 317.013	500	500
1.214	Extended Carryback of Farming Loss	Natural Resources	1999	316.048	500	500
1.215	Intangible Development Costs for Fuels	Natural Resources	1954	316.695, 317.013	Less than 500	Less than 500
1.217	Expensing Timber-Growing Costs	Natural Resources	1986	316.048, 317.013	Less than 500	Less than 500
1.218	Expensing and Amortization of Reforestation Costs	Natural Resources	1980	316.048, 317.013	500	500
1.219	Magazine Circulation Expenditures	Tax Administration	1950	316.048, 317.013	Less than 500	Less than 500
1.220	Completed Contract Rules	Tax Administration	1986	316.048, 317.013	500	1,000
1.221	Charitable Contributions	Social Policy	1917 and 1935	316.695, 317.013	505,000	555,000
1.222	Casualty and Theft Losses	Social Policy	1913	316.695	400	2,200
1.223	Local Income Taxes	Social Policy	1913	316.695	8,700	26,100
<i>Oregon Subtractions</i>						
1.301	Oregon 529 College Savings Network	Education	1999	316.699	1,300	0
1.302	Scholarship Awards Used for Housing Expenses	Education	1999	316.846	1,400	1,400
1.303	AmeriCorps Awards	Education	2021	316.847	Less than 100	Less than 100
1.304	Medical Subtraction for Elderly	Human Services	2013	316.693	55,000	55,000
1.305	Additional Deduction for Elderly or Blind	Human Services	1989	316.695(7)	28,300	29,600
1.306	ABLE Account Contributions	Human Services	2015	316.699	Less than 100	0

PERSONAL INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.307	Social Security Benefits (Oregon)	Human Services	1985	316.054	1,350,000	1,560,000
1.308	Film Production Labor Rebate	Economic/Community	2005	316.698, 317.394	1,000	1,000
1.309	Artist's Charitable Contribution	Economic/Community	1979	316.838	Less than 100	Less than 100
1.310	Oregon Investment Advantage	Economic/Community	2001	316.778, 317.391	Not Available	Not Available
1.311	Dividend Received from an IC-DISC	Economic/Community	2013	316.749(1)	13,200	14,100
1.312	Individual Development Accounts (Exclusion and Subtraction)	Economic/Community	1999	316.848	Less than 100	Less than 100
1.313	Manufactured Dwelling Park Capital Gain	Economic/Community	2005	Ore. Laws 2005 c.826 §6-10	900	300
1.314	First-time Home Buyer Savings	Economic/Community	2018	316.798	1,100	3,000
1.315	Manufactured Dwelling Tenant Payment	Economic/Community	2007	316.795, 317.092	Less than 100	Less than 100
1.316	Interest from State and Local Government Bonds	Economic/Community	1987	316.056	300	300
1.317	Personal Casualty Loss	Economic/Community	2023	316.850	600	200
1.318	Wildfire Judgment or Settlement and Legal Fees	Economic/Community	2024	Ore. Laws 2024 c.50	Not Available	Not Available
1.319	Depletion Costs for Metal Mines	Natural Resources	Pre-1953	317.374	Less than 100	Less than 100
1.320	Energy Conservation Subsidies (Oregon)	Natural Resources	1981	316.744, 317.386	Less than 100	Less than 100
1.321	Agriculture Sector Net Operating Loss Carryback	Natural Resources	2022	Ore. Laws 2022 c.82 §12-15	100	200
1.323	Hydroelectric Dam and Waterway Workers	Tax Administration	1997	316.127(8), (10)	Not Available	Not Available
1.324	Income Earned in "Indian Country"	Government	1977	316.777	8,600	9,300
1.325	Federal Pension Income	Government	1998	316.680(1)(e)	129,000	129,000
1.326	Legislative Per Diem and Allowance	Government	1967	171.072(7)	100	100
1.327	Oregon State Lottery Prizes	Government	1985	461.560	400	500
1.328	Federal Income Tax Subtraction	Social Policy	1929	316.680(1)(b), 316.685, 316.695	1,200,000	1,420,000
1.329	Military Active Duty and Related Pay	Social Policy	1969	316.792	47,200	48,100
1.330	Interest and Dividends on U.S. Obligations	Federal Law	1970	316.680(1)(a)	79,000	62,000

PERSONAL INCOME TAX EXPENDITURES

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
<i>Oregon Credits</i>						
1.401	Employer Provided Scholarships	Education	2001	315.237	Less than 100	Less than 100
1.402	Contributions of Computer Equipment	Education	1985	317.151	Less than 100	Less than 100
1.403	Opportunity Grant Fund Contributions	Education	2018	315.643	Not Available	Not Available
1.404	Employee Training	Education	2017	315.523	Less than 100	Less than 100
1.405	Contributions to 529 Account	Education	2019	315.650	17,600	17,600
1.406	Earned Income Credit	Human Services	1997	315.266	106,000	54,300
1.407	Child with a Disability	Human Services	1985	316.099(3)	8,700	8,700
1.408	Rural Medical Practice	Human Services	1989	315.613, 315.616, 315.619	11,800	11,000
1.409	Volunteer Rural Emergency Medical Providers	Human Services	2005	315.622	100	100
1.410	Severe Disability	Human Services	1985	316.758	7,800	7,800
1.411	Contributions to ABLE Account	Human Services	2019	315.650	600	600
1.412	Oregon Kids Credit	Human Services	2023	315.273	78,100	79,600
1.413	Farmworker Housing Lender's Credit	Economic/Community	1989	317.147	Less than 100	0
1.414	Agriculture Workforce Housing Construction	Economic/Community	1989	315.164	1,800	2,900
1.415	Film Production Development Contributions	Economic/Community	2003	315.514, 315.516	Not Available	Not Available
1.416	Renewable Resource Equipment Manufacturing Facilities	Economic/Community	2011	315.341	Less than 100	Less than 100
1.417	Oregon Low-Income Community Jobs Initiative	Economic/Community	2011	315.533(2)	Not Available	Not Available
1.418	Long Term Rural Enterprise Zone Facilities (Income Tax)	Economic/Community	1997	317.124	Not Available	Not Available
1.419	Reservation Enterprise Zone (Income Tax)	Economic/Community	2001	315.506	Less than 100	Less than 100
1.420	Public University Venture Development Fund	Economic/Community	2005	315.640	200	200
1.421	Working Family Household and Dependent Care	Economic/Community	2015	315.264	34,300	34,200
1.422	Contributions to Office of Child Care	Economic/Community	2001	315.213	Less than 100	Less than 100

PERSONAL INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.423	Individual Development Account Donation (Credit)	Economic/Community	1999	315.271	13,400	13,700
1.424	Oregon Affordable Housing Lender's Credit	Economic/Community	1989	317.097	300	300
1.425	Manufactured Dwelling Park Closure	Economic/Community	2007	316.090	Less than 100	Less than 100
1.426	Qualified Research Expenses for Semiconductor Companies	Economic/Community	2023	315.518, 315.519	800	2,000
1.427	Publicly Supported Housing Seller's Credit	Economic/Community	2023	315.283	Not Yet Available	Not Yet Available
1.428	Agricultural Worker Overtime	Natural Resources	2022	315.133	16,700	44,800
1.429	Small Forest Owner Forest Conservation (Income Tax)	Natural Resources	2022	315.124	Not Available	Not Available
1.430	Bovine Manure	Natural Resources	2017	315.176(3)(a)	Not Available	Not Available
1.431	Crop Donation	Natural Resources	1977	315.156	300	200
1.432	Energy Conservation Lender's Credit	Natural Resources	1981	317.112	Less than 100	Less than 100
1.433	Transportation Projects	Natural Resources	2011	315.336(1)	Less than 100	0
1.434	Alternative Energy Devices (Residential)	Natural Resources	1977	316.116	200	Less than 100
1.435	Business Energy Facilities, Conservation and Renewables	Natural Resources	1979	315.354	100	Less than 100
1.436	Energy Conservation Projects	Natural Resources	2011	315.331(1)	Less than 100	Less than 100
1.438	Fish Screening Devices	Natural Resources	1989	315.138	Less than 100	Less than 100
1.439	Short Line Railroad Rehabilitation	Transportation	2019	315.593	Not Available	Not Available
1.441	Political Contributions	Government	1969	316.102	6,000	4,600
1.442	Oregon Cultural Trust	Social Policy	2001	315.675	8,500	8,800
1.443	Personal Exemption	Social Policy	1985	316.085	1,260,000	1,270,000
1.444	Oregon Veterans' Home Physicians	Social Policy	2007	315.624	Less than 100	Less than 100
1.445	Certain Retirement Income	Social Policy	1991	316.157	900	400
<i>Oregon Other</i>						
1.502	Tax Rates for Certain Pass-Through Income	Economic/Community	2013	316.043(2)	242,000	253,000
1.503	Income Averaging for Farmers	Natural Resources	2001	314.297	1,300	1,300

PERSONAL INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.504	Capital Gains from Farm Property	Natural Resources	2001	316.045, 317.063, 318.020	4,700	5,200
1.505	Nonresident Disaster Related Income	Consumer and Business Services	2015	401.690	Not Available	Not Available
1.507	Nonresident Armed Forces	Social Policy	1942	50 U.S.C. § 4001	11,100	11,800
1.508	Nonresident Spouse of Nonresident Servicemember Serving in Oregon	Social Policy	2009	50 U.S.C. § 4001	Not Available	Not Available

CORPORATE INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
Federal Exclusions						
1.010	Regional Economic Development Incentives	Economic/Community	1993	316.048, 317.013	Less than 500	Less than 500
1.011	Capital Gain Invested in Opportunity Zone	Economic/Community	2017	316.048, 317.013	3,000	Less than 500
1.013	Imputed Interest Rules	Economic/Community	1984	316.048, 317.013	Less than 500	Less than 500
1.023	Employee Stock Ownership Plans	Economic/Community	1974	316.048, 317.013	26,000	29,000
1.030	Cash Accounting, Other than Agriculture	Economic/Community	1916	316.048, 317.013	5,000	5,000
1.031	Inventory Methods of Valuation	Economic/Community	1938	316.048, 317.013	11,000	11,000
1.033	Pass-Through Status of Specified Publicly Traded Partnerships	Natural Resources	1987	317.013	4,500	6,500
1.035	Certain Disaster Mitigation Payments	Consumer and Business Services	2005	316.048, 317.013	Less than 500	Less than 500
1.036	Credit Union Income	Consumer and Business Services	1951	317.080(1)	32,000	37,000
1.037	Elimination of Tax Exempt Interest Allocation for Banks	Consumer and Business Services	2009	317.013	4,500	4,500
1.040	Gain on Nondealer Installment Sales	Tax Administration	1921	316.048, 317.013	41,000	46,000
1.041	Gain on Like-Kind Exchanges	Tax Administration	1921	316.048, 317.013	10,000	9,500

CORPORATE INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.049	Life Insurance Proceeds	Social Policy	1913	316.048, 317.013	15,000	16,000
1.054	Deferral of Certain Advance Payments	Federal Law	2017	316.048, 317.013	12,000	13,000
Federal Deductions						
1.202	Removal of Architectural Barriers	Human Services	1976	316.048, 317.013	Less than 500	Less than 500
1.203	Deduction of Certain Film and Television Production Costs	Economic/Community	2004	316.048, 317.013	500	Less than 500
1.204	Accelerated Depreciation of Certain Buildings	Economic/Community	1954	316.048, 317.013	2,500	2,500
1.205	Accelerated Depreciation of Equipment	Economic/Community	1954	316.048, 317.013	97,000	3,500
1.206	Section 179 Expensing Allowances	Economic/Community	1958	316.048, 317.013	7,000	8,000
1.207	Amortization of Business Start-Up Costs	Economic/Community	1980	316.048, 317.013	Less than 500	Less than 500
1.208	Foreign-Derived Intangible Income	Economic/Community	2017	317.013	120,000	110,000
1.209	Accelerated Depreciation of Rental Housing	Economic/Community	1954	316.048, 317.013	6,000	5,000
1.212	Soil and Water Conservation Expenditures	Natural Resources	1954	316.048, 317.013	Less than 500	Less than 500
1.213	Fertilizer and Soil Conditioner Costs	Natural Resources	1960	316.048, 317.013	Less than 500	Less than 500
1.215	Intangible Development Costs for Fuels	Natural Resources	1954	316.695, 317.013	3,000	2,000
1.216	Amortization of Air Pollution Control Facilities	Natural Resources	2005	317.013	Less than 500	Less than 500
1.217	Expensing Timber-Growing Costs	Natural Resources	1986	316.048, 317.013	2,500	2,500
1.218	Expensing and Amortization of Reforestation Costs	Natural Resources	1980	316.048, 317.013	Less than 500	Less than 500
1.219	Magazine Circulation Expenditures	Tax Administration	1950	316.048, 317.013	Less than 500	Less than 500
1.220	Completed Contract Rules	Tax Administration	1986	316.048, 317.013	7,000	7,500
1.221	Charitable Contributions	Social Policy	1917 and 1935	316.695, 317.013	38,000	50,000

CORPORATE INCOME TAX EXPENDITURES

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)		
				2023-25	2025-27	
Oregon Subtractions						
1.308	Film Production Labor Rebate	Economic/Community	2005	316.698, 317.394	Less than 100	Less than 100
1.310	Oregon Investment Advantage	Economic/Community	2001	316.778, 317.391	Not Available	Not Available
1.313	Manufactured Dwelling Park Capital Gain	Economic/Community	2005	Ore. Laws 2005 c.826 §6-10	Less than 100	Less than 100
1.315	Manufactured Dwelling Tenant Payment	Economic/Community	2007	316.795, 317.092	Less than 100	Less than 100
1.319	Depletion Costs for Metal Mines	Natural Resources	Pre- 1953	317.374	Less than 100	Less than 100
1.320	Energy Conservation Subsidies (Oregon)	Natural Resources	1981	316.744, 317.386	Less than 100	Less than 100
1.321	Agriculture Sector Net Operating Loss Carryback	Natural Resources	2022	Ore. Laws 2022 c.82 §12-15	10,600	19,100
1.322	Wet Marine and Transportation Policies	Consumer and Business Services	1995	317.080(8)	2,500	2,500
Oregon Credits						
1.401	Employer Provided Scholarships	Education	2001	315.237	Less than 100	Less than 100
1.402	Contributions of Computer Equipment	Education	1985	317.151	Less than 100	Less than 100
1.403	Opportunity Grant Fund Contributions	Education	2018	315.643	Not Available	Not Available
1.404	Employee Training	Education	2017	315.523	Less than 100	Less than 100
1.413	Farmworker Housing Lender's Credit	Economic/Community	1989	317.147	Less than 100	0
1.414	Agriculture Workforce Housing Construction	Economic/Community	1989	315.164	5,500	7,100
1.415	Film Production Development Contributions	Economic/Community	2003	315.514, 315.516	Not Available	Not Available
1.416	Renewable Resource Equipment Manufacturing Facilities	Economic/Community	2011	315.341	Less than 100	Less than 100
1.417	Oregon Low-Income Community Jobs Initiative	Economic/Community	2011	315.533(2)	Not Available	Not Available
1.418	Long Term Rural Enterprise Zone Facilities (Income Tax)	Economic/Community	1997	317.124	Not Available	Not Available
1.419	Reservation Enterprise Zone (Income Tax)	Economic/Community	2001	315.506	Less than 100	Less than 100

CORPORATE INCOME TAX EXPENDITURES

	Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
					2023-25	2025-27
1.420	Public University Venture Development Fund	Economic/Community	2005	315.640	Less than 100	Less than 100
1.422	Contributions to Office of Child Care	Economic/Community	2001	315.213	Less than 100	Less than 100
1.423	Individual Development Account Donation (Credit)	Economic/Community	1999	315.271	Less than 100	Less than 100
1.424	Oregon Affordable Housing Lender's Credit	Economic/Community	1989	317.097	14,700	15,700
1.426	Qualified Research Expenses for Semiconductor Companies	Economic/Community	2023	315.518, 315.519	23,100	53,500
1.427	Publicly Supported Housing Seller's Credit	Economic/Community	2023	315.283	Not Yet Available	Not Yet Available
1.428	Agricultural Worker Overtime	Natural Resources	2022	315.133	2,900	5,600
1.429	Small Forest Owner Forest Conservation (Income Tax)	Natural Resources	2022	315.124	Not Available	Not Available
1.430	Bovine Manure	Natural Resources	2017	315.176(3)(a)	Not Available	Not Available
1.431	Crop Donation	Natural Resources	1977	315.156	Less than 100	Less than 100
1.432	Energy Conservation Lender's Credit	Natural Resources	1981	317.112	Less than 100	Less than 100
1.433	Transportation Projects	Natural Resources	2011	315.336(1)	Less than 100	0
1.435	Business Energy Facilities, Conservation and Renewables	Natural Resources	1979	315.354	200	Less than 100
1.436	Energy Conservation Projects	Natural Resources	2011	315.331(1)	Less than 100	Less than 100
1.437	Weatherization Lender's Credit	Natural Resources	1977	317.111	Less than 100	Less than 100
1.438	Fish Screening Devices	Natural Resources	1989	315.138	Less than 100	Less than 100
1.439	Short Line Railroad Rehabilitation	Transportation	2019	315.593	Not Available	Not Available
1.440	Oregon Life and Health IGA Assessments	Consumer and Business Services	1975	734.835	700	200
1.442	Oregon Cultural Trust	Social Policy	2001	315.675	Less than 100	Less than 100

CORPORATE INCOME TAX EXPENDITURES

Tax Expenditure	Program or Function	Year Enacted	Oregon Statute	Revenue Impact (\$ Thousands)	
				2023-25	2025-27
Oregon Other					
1.501 Public Warehouse Sales Throwback Exemption	Economic/Community	2005	314.665	Less than 100	Less than 100
1.504 Capital Gains from Farm Property	Natural Resources	2001	316.045, 317.063, 318.020	Less than 100	Less than 100
1.505 Nonresident Disaster Related Income	Consumer and Business Services	2015	401.690	Not Available	Not Available
1.506 Apportionment for Utility and Telecommunication Companies	Consumer and Business Services	2001	314.280	800	800

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
529 Account, Contributions to	1.405	Income Tax
529 College Savings Network, Oregon	1.301	Income Tax
ABLE Account Contributions	1.306	Income Tax
ABLE Account, Contributions to	1.411	Income Tax
ADU or Newly Converted Multiplex, New	2.031	Property Tax
Abroad, Allowances for Federal Employees	1.042	Income Tax
Academies, Day Care, and Student Housing	2.001	Property Tax
Accelerated Depreciation of Certain Buildings	1.204	Income Tax
Accelerated Depreciation of Equipment	1.205	Income Tax
Accelerated Depreciation of Rental Housing	1.209	Income Tax
Accident and Disability Insurance, Employer Paid	1.019	Income Tax
Account Contributions, ABLE	1.306	Income Tax
Account Donation (Credit), Individual Development	1.423	Income Tax
Account, Contributions to 529	1.405	Income Tax
Account, Contributions to ABLE	1.411	Income Tax
Accounting, Other than Agriculture, Cash	1.030	Income Tax
Accounts (Exclusion and Subtraction), Individual Development	1.312	Income Tax
Accounts, Health Savings	1.104	Income Tax
Acquisition of Stock, Spread on	1.026	Income Tax
Active Duty Military, Homestead Exemption for	2.120	Property Tax
Active Duty and Related Pay, Military	1.329	Income Tax
Additional Deduction for Elderly or Blind	1.305	Income Tax
Adoption Benefits, Employee	1.005	Income Tax
Advance Payments, Deferral of Certain	1.054	Income Tax
Affordable Housing Covenant	2.114	Property Tax
Affordable Housing Lender's Credit, Oregon	1.424	Income Tax
Affordable Housing Projects Receiving Grant	2.115	Property Tax
Agricultural Housing and Day Care Facilities	2.009	Property Tax
Agricultural Products Held by the Farmer	2.036	Property Tax
Agricultural Worker Overtime	1.428	Income Tax
Agriculture Sector Net Operating Loss Carryback	1.321	Income Tax
Agriculture Workforce Housing Construction	1.414	Income Tax
Agriculture, Cash Accounting, Other than	1.030	Income Tax
Air Pollution Control Facilities, Amortization of	1.216	Income Tax
Air Transportation Companies, Aircraft Under 75,000 Pounds Owned by	2.119	Property Tax
Air Transportation Companies, Foreign-Owned Aircraft and Aircraft Not Owned by	2.066	Property Tax
Aircraft Departing U.S., Fuel for	3.004	Gas, Use, and Jet Fuel Taxes
Aircraft Under 75,000 Pounds Owned by Air Transportation Companies	2.119	Property Tax
Aircraft and Aircraft Not Owned by Air Transportation Companies, Foreign-Owned	2.066	Property Tax
Airports, Leased Docks and	2.027	Property Tax
Allowance, Legislative Per Diem and	1.326	Income Tax
Allowances for Clergy Housing, Rental	1.045	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Allowances for Federal Employees Abroad	1.042	Income Tax
Allowances of Armed Forces Personnel, Benefits and Allowances, Section 179 Expensing	1.051	Income Tax
Alternative Energy Devices (Residential)	1.206	Income Tax
Alternative Energy Systems	1.434	Income Tax
AmeriCorps Awards	2.116	Property Tax
Amortization of Air Pollution Control Facilities	1.303	Income Tax
Amortization of Business Start-Up Costs	1.216	Income Tax
Amortization of Reforestation Costs, Expensing and Amtrak Passenger Railroad	1.207	Income Tax
Apportionment for Utility and Telecommunication Companies	1.218	Income Tax
Apprenticeship/Training Trust, Industry	2.094	Property Tax
Architectural Barriers, Removal of	1.506	Income Tax
Armed Forces Personnel, Benefits and Allowances of Armed Forces, Nonresident	2.017	Property Tax
Artist's Charitable Contribution	1.202	Income Tax
Assessment for Certain Companies, Cap on Central Assessments, Oregon Life and Health IGA	1.051	Income Tax
Association, Forest Fire Protection	1.507	Income Tax
Associations, Nonprofit Electrical Distribution	1.309	Income Tax
Associations, Nonprofit Water	2.101	Property Tax
Associations, Voluntary Employees' Beneficiary	1.440	Income Tax
Auction, Vehicles Sold at	2.053	Property Tax
Averaging for Farmers, Income	2.068	Property Tax
Awards Used for Housing Expenses, Scholarship	2.067	Property Tax
Awards, AmeriCorps	1.044	Income Tax
Awards, Employee	18.002	Vehicle Privilege Tax
Banks, Elimination of Tax Exempt Interest Allocation for	1.503	Income Tax
Barriers, Removal of Architectural	1.302	Income Tax
Beach Lands	1.303	Income Tax
Beneficiary Associations, Voluntary Employees'	1.024	Income Tax
Benefits (Federal), Social Security	1.037	Income Tax
Benefits (Medical), Workers' Compensation	1.037	Income Tax
Benefits (Nonmedical), Workers' Compensation	1.039	Income Tax
Benefits (Oregon), Social Security	1.307	Income Tax
Benefits and Allowances of Armed Forces Personnel	1.051	Income Tax
Benefits and Services, Veterans'	1.028	Income Tax
Benefits of Military and Victims of Terrorism, Disability	1.050	Income Tax
Benefits, Employee Adoption	1.005	Income Tax
Benefits, Employer Paid Medical and Cafeteria Plan	1.007	Income Tax
Benefits, Employer Paid Transportation	1.034	Income Tax
Benefits, Employer Provided Education	1.025	Income Tax
Benefits, Miscellaneous Fringe	1.021	Income Tax
Bequests, Charitable	15.004	Estate Transfer Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Beverage Containers Requiring Deposit	2.070	Property Tax
Biomass, Cooperative Providing Heat by Combustion of	2.048	Property Tax
Blind, Additional Deduction for Elderly or	1.305	Income Tax
Bonds, Deferral of Interest on Savings	1.053	Income Tax
Bonds, Interest from State and Local Government	1.316	Income Tax
Bovine Manure	1.430	Income Tax
Bridges of Local Governments, Interstate	2.077	Property Tax
Bridges of Other States or Subdivisions, Interstate	2.081	Property Tax
Brownfield Development	2.015	Property Tax
Building Low-Income Housing, Land Owned by Nonprofit for Purpose of	2.008	Property Tax
Buildings Under Construction, Commercial	2.011	Property Tax
Buildings, Accelerated Depreciation of Certain	1.204	Income Tax
Burial Grounds, and Mausoleums, Cemeteries,	2.088	Property Tax
Burning Smoke Management Equipment, Field	2.043	Property Tax
Business Energy Facilities, Conservation and Renewables	1.435	Income Tax
Business Personal Property and Residential Floating Structures	2.025	Property Tax
Business Start-Up Costs, Amortization of	1.207	Income Tax
Business Stock, Exclusion of Gain from Certain Small	1.012	Income Tax
Businesses, Enterprise Zone	2.013	Property Tax
Buyer Savings, First-time Home	1.314	Income Tax
Cafeteria Plan Benefits, Employer Paid Medical and	1.007	Income Tax
Cancellation of Mortgage Debt	1.017	Income Tax
Cap on Central Assessment for Certain Companies	2.101	Property Tax
Capital Gain Invested in Opportunity Zone	1.011	Income Tax
Capital Gain, Manufactured Dwelling Park	1.313	Income Tax
Capital Gains from Farm Property	1.504	Income Tax
Capital Gains on Gifts	1.048	Income Tax
Capital Gains on Home Sales	1.015	Income Tax
Capital Gains on Inherited Property	1.047	Income Tax
Care Facilities, Agricultural Housing and Day	2.009	Property Tax
Care Facilities, Long Term	2.097	Property Tax
Care, Contributions to Office of Child	1.422	Income Tax
Care, Employer Provided Dependent	1.014	Income Tax
Care, Working Family Household and Dependent	1.421	Income Tax
Care, and Student Housing, Academies, Day	2.001	Property Tax
Cargo Containers	2.026	Property Tax
Carryback of Farming Loss, Extended	1.214	Income Tax
Carryback, Agriculture Sector Net Operating Loss	1.321	Income Tax
Cars Being Repaired, Railroad	2.029	Property Tax
Cash Accounting, Other than Agriculture	1.030	Income Tax
Casualty Loss, Personal	1.317	Income Tax
Casualty and Theft Losses	1.222	Income Tax
Cemeteries, Burial Grounds, and Mausoleums	2.088	Property Tax
Center Pivot Irrigation Equipment	2.041	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Centers, Senior Services	2.007	Property Tax
Central Assessment for Certain Companies, Cap on	2.101	Property Tax
Centrally Assessed, Watercraft	2.118	Property Tax
Charitable Bequests	15.004	Estate Transfer Tax
Charitable Contribution, Artist's	1.309	Income Tax
Charitable Contributions	1.221	Income Tax
Charitable Organizations	4.008	Weight-Mile Tax
Charitable, Literary, and Scientific Organizations	2.085	Property Tax
Child Care, Contributions to Office of	1.422	Income Tax
Child with a Disability	1.407	Income Tax
Circulation Expenditures, Magazine	1.219	Income Tax
City Owned Sports Facility	2.089	Property Tax
Claims on Federal Land, Mining	2.061	Property Tax
Classroom Expenses, Teacher	1.101	Income Tax
Clergy Housing, Rental Allowances for	1.045	Income Tax
Closure, Manufactured Dwelling Park	1.425	Income Tax
College Savings Network, Oregon 529	1.301	Income Tax
Combat Pay	1.052	Income Tax
Commercial Buildings Under Construction	2.011	Property Tax
Communication Related Property, Certain	2.099	Property Tax
Community Jobs Initiative, Oregon Low-Income	1.417	Income Tax
Companies, Aircraft Under 75,000 Pounds Owned by Air Transportation	2.119	Property Tax
Companies, Apportionment for Utility and Telecommunication	1.506	Income Tax
Companies, Cap on Central Assessment for Certain	2.101	Property Tax
Companies, Foreign-Owned Aircraft and Aircraft Not Owned by Air Transportation	2.066	Property Tax
Companies, Qualified Research Expenses for Semiconductor	1.426	Income Tax
Compensation Benefits (Medical), Workers'	1.038	Income Tax
Compensation Benefits (Nonmedical), Workers'	1.039	Income Tax
Compensatory Damages	1.006	Income Tax
Completed Contract Rules	1.220	Income Tax
Computer Equipment, Contributions of	1.402	Income Tax
Conditioner Costs, Fertilizer and Soil	1.213	Income Tax
Conservation (Estate Transfer Tax), Small Forest Owner Forest	15.006	Estate Transfer Tax
Conservation (Income Tax), Small Forest Owner Forest	1.429	Income Tax
Conservation Easement	15.001	Estate Transfer Tax
Conservation Easements	2.133	Property Tax
Conservation Expenditures, Soil and Water	1.212	Income Tax
Conservation Lender's Credit, Energy	1.432	Income Tax
Conservation Projects, Energy	1.436	Income Tax
Conservation Subsidies (Federal), Energy	1.032	Income Tax
Conservation Subsidies (Oregon), Energy	1.320	Income Tax
Conservation and Renewables, Business Energy Facilities,	1.435	Income Tax
Construction in Process in an Enterprise Zone	2.012	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Construction, Agriculture Workforce Housing	1.414	Income Tax
Construction, Commercial Buildings Under	2.011	Property Tax
Construction, Exempt	14.001	Local Construction Tax
Construction, Subcontractor Labor Payments for Residential	9.002	Corporate Activity Tax
Consumers, Small Quantity by	5.001	Cigarette Tax
Containers Requiring Deposit, Beverage	2.070	Property Tax
Containers, Cargo	2.026	Property Tax
Contract Rules, Completed	1.220	Income Tax
Contract, Federal Standing Timber Under	2.054	Property Tax
Contract, State and Local Standing Timber Under	2.055	Property Tax
Contribution, Artist's Charitable	1.309	Income Tax
Contributions and Earnings, IRA	1.105	Income Tax
Contributions and Earnings, Pension	1.008	Income Tax
Contributions of Computer Equipment	1.402	Income Tax
Contributions to 529 Account	1.405	Income Tax
Contributions to ABLE Account	1.411	Income Tax
Contributions to Office of Child Care	1.422	Income Tax
Contributions, ABLE Account	1.306	Income Tax
Contributions, Charitable	1.221	Income Tax
Contributions, Film Production Development	1.415	Income Tax
Contributions, Opportunity Grant Fund	1.403	Income Tax
Contributions, Political	1.441	Income Tax
Cooperative Providing Heat by Combustion of Biomass	2.048	Property Tax
Cooperatives, Fraternities, Sororities, and	2.095	Property Tax
Corporation, Property of LLC Owned by Nonprofit	2.092	Property Tax
Corporations for Irrigation, Drainage, Water Supply or Flood Control	2.079	Property Tax
Costs for Fuels, Intangible Development	1.215	Income Tax
Costs for Metal Mines, Depletion	1.319	Income Tax
Costs, Amortization of Business Start-Up	1.207	Income Tax
Costs, Deduction of Certain Film and Television Production	1.203	Income Tax
Costs, Expensing Timber-Growing	1.217	Income Tax
Costs, Expensing and Amortization of Reforestation	1.218	Income Tax
Costs, Fertilizer and Soil Conditioner	1.213	Income Tax
County Roads, Forest Products on	4.002	Weight-Mile Tax
Covenant, Affordable Housing	2.114	Property Tax
Crab Pots	2.044	Property Tax
Credit Union Income	1.036	Income Tax
Credit for Property Taxes Paid	11.002	Oil and Gas Privilege Tax
Credit, Earned Income	1.406	Income Tax
Credit, Energy Conservation Lender's	1.432	Income Tax
Credit, Farmworker Housing Lender's	1.413	Income Tax
Credit, Oregon Affordable Housing Lender's	1.424	Income Tax
Credit, Publicly Supported Housing Seller's	1.427	Income Tax
Credit, Weatherization Lender's	1.437	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Crop Donation	1.431	Income Tax
Crops, Plants, and Fruit Trees	2.035	Property Tax
Cultural Trust, Oregon	1.442	Income Tax
Dam and Waterway Workers, Hydroelectric	1.323	Income Tax
Damaged Property, Destroyed or	2.140	Property Tax
Damages, Compensatory	1.006	Income Tax
Day Care Facilities, Agricultural Housing and	2.009	Property Tax
Day Care, and Student Housing, Academies,	2.001	Property Tax
Debt, Cancellation of Mortgage	1.017	Income Tax
Debt, Discharge of Certain Student Loan	1.046	Income Tax
Debt, Interest on Oregon State and Local	1.043	Income Tax
Deduction for Elderly or Blind, Additional	1.305	Income Tax
Deduction of Certain Film and Television Production Costs	1.203	Income Tax
Deferral of Certain Advance Payments	1.054	Income Tax
Deferral of Interest on Savings Bonds	1.053	Income Tax
Dental Expenses, Medical and	1.201	Income Tax
Dependent Care, Employer Provided	1.014	Income Tax
Dependent Care, Working Family Household and	1.421	Income Tax
Dependents TRICARE Insurance, Military and	1.029	Income Tax
Depletion Costs for Metal Mines	1.319	Income Tax
Deposit, Beverage Containers Requiring	2.070	Property Tax
Depreciation of Certain Buildings, Accelerated	1.204	Income Tax
Depreciation of Equipment, Accelerated	1.205	Income Tax
Depreciation of Rental Housing, Accelerated	1.209	Income Tax
Destroyed or Damaged Property	2.140	Property Tax
Development Account Donation (Credit), Individual	1.423	Income Tax
Development Accounts (Exclusion and Subtraction), Individual	1.312	Income Tax
Development Contributions, Film Production	1.415	Income Tax
Development Costs for Fuels, Intangible	1.215	Income Tax
Development Fund, Public University Venture	1.420	Income Tax
Development Incentives, Regional Economic	1.010	Income Tax
Development Zone, Rural Renewable Energy	2.018	Property Tax
Development Zone, Vertical Housing	2.102	Property Tax
Development, Brownfield	2.015	Property Tax
Devices, Fish Screening	1.438	Income Tax
Diem and Allowance, Legislative Per	1.326	Income Tax
Disability Benefits of Military and Victims of Terrorism	1.050	Income Tax
Disability Insurance, Employer Paid Accident and	1.019	Income Tax
Disability, Child with a	1.407	Income Tax
Disability, Severe	1.410	Income Tax
Disabled Veterans or Surviving Spouses of Veterans	2.111	Property Tax
Disaster Mitigation Payments, Certain	1.035	Income Tax
Disaster Related Income, Nonresident	1.505	Income Tax
Disaster or Emergency Related Work, Property Used for	2.069	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Discharge of Certain Student Loan Debt	1.046	Income Tax
Dividend Received from an IC-DISC	1.311	Income Tax
Dividends on U.S. Obligations, Interest and	1.330	Income Tax
Docks and Airports, Leased	2.027	Property Tax
Donation (Credit), Individual Development Account	1.423	Income Tax
Donation, Crop	1.431	Income Tax
Drainage, Water Supply or Flood Control, Corporations for Irrigation,	2.079	Property Tax
Dwelling Park Closure, Manufactured	1.425	Income Tax
Dwelling Tenant Payment, Manufactured	1.315	Income Tax
Dwelling Units, Exempt	13.001	Lodging Tax
Earned Abroad by U.S. Citizens, Income	1.016	Income Tax
Earned Income Credit	1.406	Income Tax
Earned in "Indian Country", Income	1.324	Income Tax
Earnings, IRA Contributions and	1.105	Income Tax
Earnings, Pension Contributions and	1.008	Income Tax
Easement, Conservation	15.001	Estate Transfer Tax
Easements, Conservation	2.133	Property Tax
Eastern Private Forestland	2.137	Property Tax
Eastern Private Standing Timber	2.057	Property Tax
Economic Development Incentives, Regional	1.010	Income Tax
Education Benefits, Employer Provided	1.025	Income Tax
Education Parking Space, Higher	2.004	Property Tax
Education Savings (Federal), Qualified	1.002	Income Tax
Elderly Housing State Funded, Nonprofit	2.023	Property Tax
Elderly Housing, Veterans in Nonprofit	2.112	Property Tax
Elderly or Blind, Additional Deduction for	1.305	Income Tax
Elderly, Medical Subtraction for	1.304	Income Tax
Elderly, Nonprofit Housing for the	2.127	Property Tax
Electrical Distribution Associations, Nonprofit	2.068	Property Tax
Electricity Transmission Property, Federally Leased High-Voltage	2.083	Property Tax
Elementary and Secondary School Vehicles	4.004	Weight-Mile Tax
Elimination of Tax Exempt Interest Allocation for Banks	1.037	Income Tax
Emergency Medical Providers, Volunteer Rural	1.409	Income Tax
Emergency Related Work, Property Used for Disaster or	2.069	Property Tax
Emergency Response, Equipment for Maritime	2.076	Property Tax
Emissions (Gas and Use Fuel Taxes), Vehicle Used for Testing	3.003	Gas, Use, and Jet Fuel Taxes
Emissions (Weight-Mile Tax), Vehicle Used for Testing	4.003	Weight-Mile Tax
Employee Adoption Benefits	1.005	Income Tax
Employee Awards	1.024	Income Tax
Employee Meals and Lodging (Nonmilitary)	1.022	Income Tax
Employee Stock Ownership Plans	1.023	Income Tax
Employee Training	1.404	Income Tax
Employees Abroad, Allowances for Federal	1.042	Income Tax
Employees' Beneficiary Associations, Voluntary	1.044	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Employer Paid Accident and Disability Insurance	1.019	Income Tax
Employer Paid Group Life Insurance Premiums	1.018	Income Tax
Employer Paid Medical and Cafeteria Plan Benefits	1.007	Income Tax
Employer Paid Transportation Benefits	1.034	Income Tax
Employer Provided Dependent Care	1.014	Income Tax
Employer Provided Education Benefits	1.025	Income Tax
Employer Provided On-Site Gyms	1.020	Income Tax
Employer Provided Scholarships	1.401	Income Tax
Employer-Provided Tuition Reduction, Exclusion of	1.003	Income Tax
Energy Conservation Lender's Credit	1.432	Income Tax
Energy Conservation Projects	1.436	Income Tax
Energy Conservation Subsidies (Federal)	1.032	Income Tax
Energy Conservation Subsidies (Oregon)	1.320	Income Tax
Energy Development Zone, Rural Renewable	2.018	Property Tax
Energy Facilities, Conservation and Renewables, Business	1.435	Income Tax
Energy Systems, Alternative	2.116	Property Tax
Enterprise Zone (Income Tax), Reservation	1.419	Income Tax
Enterprise Zone (Property Tax), Long Term Rural	2.014	Property Tax
Enterprise Zone Businesses	2.013	Property Tax
Enterprise Zone Facilities (Income Tax), Long Term Rural	1.418	Income Tax
Enterprise Zone, Construction in Process in an	2.012	Property Tax
Entertainment Expenses, Meal and	1.027	Income Tax
Environmentally Sensitive Logging Equipment	2.051	Property Tax
Equipment Manufacturing Facilities, Renewable Resource	1.416	Income Tax
Equipment Rental, Heavy	2.073	Property Tax
Equipment for Maritime Emergency Response	2.076	Property Tax
Equipment, Accelerated Depreciation of	1.205	Income Tax
Equipment, Center Pivot Irrigation	2.041	Property Tax
Equipment, Contributions of Computer	1.402	Income Tax
Equipment, Environmentally Sensitive Logging	2.051	Property Tax
Equipment, Farm Machinery and	2.033	Property Tax
Equipment, Field Burning Smoke Management	2.043	Property Tax
Equipment, Food Processing	2.032	Property Tax
Equipment, Other Farm/Aquaculture/Egg	2.042	Property Tax
Exchanges, Gain on Like-Kind	1.041	Income Tax
Excluded Hospitals	12.001	Medical Provider Taxes
Exclusion of Employer-Provided Tuition Reduction	1.003	Income Tax
Exclusion of Gain from Certain Small Business Stock	1.012	Income Tax
Exempt Construction	14.001	Local Construction Tax
Exempt Dwelling Units	13.001	Lodging Tax
Exempt Interest Allocation for Banks, Elimination of Tax	1.037	Income Tax
Exempt Lease from Taxable Owner	2.090	Property Tax
Exempt Owner, Exempt Lease from	2.091	Property Tax
Exemption for Active Duty Military, Homestead	2.120	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Exemption, Personal	1.443	Income Tax
Expenditures, Magazine Circulation	1.219	Income Tax
Expenditures, Soil and Water Conservation	1.212	Income Tax
Expenses for Semiconductor Companies, Qualified Research	1.426	Income Tax
Expenses of National Guard and Reserve Members, Overnight Travel	1.107	Income Tax
Expenses, Meal and Entertainment	1.027	Income Tax
Expenses, Medical and Dental	1.201	Income Tax
Expenses, Moving	1.106	Income Tax
Expenses, Scholarship Awards Used for Housing	1.302	Income Tax
Expenses, Teacher Classroom	1.101	Income Tax
Expensing Allowances, Section 179	1.206	Income Tax
Expensing Timber-Growing Costs	1.217	Income Tax
Expensing and Amortization of Reforestation Costs	1.218	Income Tax
Extended Carryback of Farming Loss	1.214	Income Tax
Extension, Natural Gas Pipeline	2.046	Property Tax
Facilities (Income Tax), Long Term Rural Enterprise Zone	1.418	Income Tax
Facilities with Prepayment Agreement	2.098	Property Tax
Facilities, Agricultural Housing and Day Care	2.009	Property Tax
Facilities, Amortization of Air Pollution Control	1.216	Income Tax
Facilities, Conservation and Renewables, Business Energy	1.435	Income Tax
Facilities, Long Term Care	2.097	Property Tax
Facilities, New Rural Health Care	2.096	Property Tax
Facilities, Nonprofit Sewage Treatment	2.049	Property Tax
Facilities, Pollution Control	2.117	Property Tax
Facilities, Renewable Resource Equipment Manufacturing	1.416	Income Tax
Facilities, Tollways and Related	2.065	Property Tax
Facility Materials, Ship Repair	2.028	Property Tax
Facility, City Owned Sports	2.089	Property Tax
Facility, Federal Land Under Recreation	2.022	Property Tax
Fairground Leased Storage Space	2.010	Property Tax
Family Household and Dependent Care, Working	1.421	Income Tax
Farm Homesites	2.130	Property Tax
Farm Machinery and Equipment	2.033	Property Tax
Farm Property, Capital Gains from	1.504	Income Tax
Farm and Logging Roads, Private	2.058	Property Tax
Farm/Aquaculture/Egg Equipment, Other	2.042	Property Tax
Farmer, Agricultural Products Held by the	2.036	Property Tax
Farmers, Income Averaging for	1.503	Income Tax
Farming Loss, Extended Carryback of	1.214	Income Tax
Farming Operations	4.001	Weight-Mile Tax
Farming and Grazing Land, Leased State and Local	2.038	Property Tax
Farmland	2.129	Property Tax
Farmworker Housing Lender's Credit	1.413	Income Tax
Federal Employees Abroad, Allowances for	1.042	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Federal Government or Tribes, Vehicles Purchased by the	17.002	Vehicle Use Tax
Federal Government, Lodging Paid for by the	13.002	Lodging Tax
Federal Grazing Land, Leased	2.039	Property Tax
Federal Income Tax Subtraction	1.328	Income Tax
Federal Land Under Recreation Facility	2.022	Property Tax
Federal Land Under Summer Homes	2.021	Property Tax
Federal Land, Mining Claims on	2.061	Property Tax
Federal Pension Income	1.325	Income Tax
Federal Property	2.093	Property Tax
Federal Standing Timber Under Contract	2.054	Property Tax
Federal Subscribers	8.003	911 and 988 Taxes
Federal and Veterans Institutions (Cigarette)	5.002	Cigarette Tax
Federal and Veterans Institutions (Other Tobacco Products)	6.001	Other Tobacco Products Tax
Federally Leased High-Voltage Electricity Transmission Property	2.083	Property Tax
Fellowship Income, Scholarship and	1.001	Income Tax
Fertilizer and Soil Conditioner Costs	1.213	Income Tax
Field Burning Smoke Management Equipment	2.043	Property Tax
Field Incinerators, Mobile	2.034	Property Tax
Film Production Development Contributions	1.415	Income Tax
Film Production Labor Rebate	1.308	Income Tax
Film and Television Production Costs, Deduction of Certain	1.203	Income Tax
Fire District, Railroad Right of Way in Rural	2.125	Property Tax
Fire Protection	4.005	Weight-Mile Tax
Fire Protection Association, Forest	2.053	Property Tax
First-time Home Buyer Savings	1.314	Income Tax
Fish Screening Devices	1.438	Income Tax
Fishing Property (Credit), Natural Resource and	15.005	Estate Transfer Tax
Fishing Property (Deduction), Natural Resource and	15.003	Estate Transfer Tax
Floating Structures, Business Personal Property and Residential	2.025	Property Tax
Flood Control, Corporations for Irrigation, Drainage, Water Supply or	2.079	Property Tax
Food Processing Equipment	2.032	Property Tax
Forces Personnel, Benefits and Allowances of Armed	1.051	Income Tax
Forces, Nonresident Armed	1.507	Income Tax
Foreign-Derived Intangible Income	1.208	Income Tax
Foreign-Owned Aircraft and Aircraft Not Owned by Air Transportation Companies	2.066	Property Tax
Forest Conservation (Estate Transfer Tax), Small Forest Owner	15.006	Estate Transfer Tax
Forest Conservation (Income Tax), Small Forest Owner	1.429	Income Tax
Forest Fire Protection Association	2.053	Property Tax
Forest Homesites	2.135	Property Tax
Forest Products on County Roads	4.002	Weight-Mile Tax
Forest Products: Gasoline	3.001	Gas, Use, and Jet Fuel Taxes
Forest Products: Other than Gasoline	3.002	Gas, Use, and Jet Fuel Taxes
Forestland Option, Small Tract	2.138	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Forestland, Eastern Private	2.137	Property Tax
Forestland, Western Private	2.136	Property Tax
Foster Care Payments, Certain	1.004	Income Tax
Fraternal Organizations	2.086	Property Tax
Fraternal Organizations, Sororities, and Cooperatives	2.095	Property Tax
Fringe Benefits, Miscellaneous	1.021	Income Tax
Fruit Trees, Crops, Plants, and	2.035	Property Tax
Fuel for Aircraft Departing U.S.	3.004	Gas, Use, and Jet Fuel Taxes
Fuels, Intangible Development Costs for	1.215	Income Tax
Fund Contributions, Opportunity Grant	1.403	Income Tax
Fund, Public University Venture Development	1.420	Income Tax
Furnishings, Student Housing	2.002	Property Tax
Gain Invested in Opportunity Zone, Capital	1.011	Income Tax
Gain from Certain Small Business Stock, Exclusion of	1.012	Income Tax
Gain on Like-Kind Exchanges	1.041	Income Tax
Gain on Nondealer Installment Sales	1.040	Income Tax
Gains from Farm Property, Capital	1.504	Income Tax
Gains on Gifts, Capital	1.048	Income Tax
Gains on Home Sales, Capital	1.015	Income Tax
Gains on Inherited Property, Capital	1.047	Income Tax
Gas Pipeline Extension, Natural	2.046	Property Tax
Gasoline, Forest Products:	3.001	Gas, Use, and Jet Fuel Taxes
Gasoline, Forest Products: Other than	3.002	Gas, Use, and Jet Fuel Taxes
Gifts, Capital Gains on	1.048	Income Tax
Government Bonds, Interest from State and Local	1.316	Income Tax
Government Leased Lines, Revenue from	10.001	Electric Cooperative Tax
Government Owned Low-Income Housing, Local	2.020	Property Tax
Government Owned or Operated Vehicles	4.006	Weight-Mile Tax
Government Public Ways, Local	2.080	Property Tax
Government Services, Property Used Exclusively for Tribal	2.082	Property Tax
Government or Tribes, Vehicles Purchased by the Federal	17.002	Vehicle Use Tax
Government, Lodging Paid for by the Federal	13.002	Lodging Tax
Governments, Interstate Bridges of Local	2.077	Property Tax
Grant Fund Contributions, Opportunity	1.403	Income Tax
Grant, Affordable Housing Projects Receiving	2.115	Property Tax
Grapes for Wine Without Oregon Designation or AVA, Oregon	7.003	Beer and Wine Taxes
Grazing Land, Leased Federal	2.039	Property Tax
Grazing Land, Leased State and Local Farming and	2.038	Property Tax
Gyms, Employer Provided On-Site	1.020	Income Tax
Habitat Land, Riparian	2.050	Property Tax
Habitat, Wildlife	2.132	Property Tax
Health Care Facilities, New Rural	2.096	Property Tax
Health Care Property, Leased Rural	2.006	Property Tax
Health IGA Assessments, Oregon Life and	1.440	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Health Insurance, Self-Employment	1.103	Income Tax
Health Savings Accounts	1.104	Income Tax
Heavy Equipment Rental	2.073	Property Tax
High-Population County, Manufactured Structure in	2.071	Property Tax
High-Voltage Electricity Transmission Property, Federally Leased	2.083	Property Tax
Higher Education Parking Space	2.004	Property Tax
Highway Lighting District, Railroad Right of Way in	2.124	Property Tax
Historic Property	2.131	Property Tax
Home Buyer Savings, First-time	1.314	Income Tax
Home Mortgage Interest	1.210	Income Tax
Home Physicians, Oregon Veterans'	1.444	Income Tax
Home Sales, Capital Gains on	1.015	Income Tax
Home Share Program Low-Income Housing	2.110	Property Tax
Home, Oregon Veterans'	12.002	Medical Provider Taxes
Homes Rebuilt After 2020 Wildfires	2.128	Property Tax
Homes, Federal Land Under Summer	2.021	Property Tax
Homesites, Farm	2.130	Property Tax
Homesites, Forest	2.135	Property Tax
Homestead Exemption for Active Duty Military	2.120	Property Tax
Hospitals, Excluded	12.001	Medical Provider Taxes
Hospitals, Type A and B	12.003	Medical Provider Taxes
Household and Dependent Care, Working Family	1.421	Income Tax
Housing Authority Rental Properties	2.019	Property Tax
Housing Construction, Agriculture Workforce	1.414	Income Tax
Housing Covenant, Affordable	2.114	Property Tax
Housing Development Zone, Vertical	2.102	Property Tax
Housing Expenses, Scholarship Awards Used for	1.302	Income Tax
Housing Lender's Credit, Farmworker	1.413	Income Tax
Housing Lender's Credit, Oregon Affordable	1.424	Income Tax
Housing Owned by Religious Organization, Low-Income	2.030	Property Tax
Housing Projects Receiving Grant, Affordable	2.115	Property Tax
Housing Publicly Owned, Leased Student	2.003	Property Tax
Housing Seller's Credit, Publicly Supported	1.427	Income Tax
Housing State Funded, Nonprofit Elderly	2.023	Property Tax
Housing and Day Care Facilities, Agricultural	2.009	Property Tax
Housing for the Elderly, Nonprofit	2.127	Property Tax
Housing in Designated Areas, Multi-Unit Rental	2.105	Property Tax
Housing, Academies, Day Care, and Student	2.001	Property Tax
Housing, Accelerated Depreciation of Rental	1.209	Income Tax
Housing, Certain Single-Unit	2.103	Property Tax
Housing, Home Share Program Low-Income	2.110	Property Tax
Housing, Land Owned by Nonprofit for Purpose of Building Low-Income	2.008	Property Tax
Housing, Local Government Owned Low-Income	2.020	Property Tax
Housing, Low Income Multi-Unit Rental	2.106	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Housing, New or Rehabilitated Multi-Unit Rental	2.109	Property Tax
Housing, Nonprofit Low-Income Rental	2.108	Property Tax
Housing, Rehabilitated	2.104	Property Tax
Housing, Rental Allowances for Clergy	1.045	Income Tax
Housing, Use-Restricted Multi-Unit Rental	2.126	Property Tax
Housing, Veterans in Nonprofit Elderly	2.112	Property Tax
Housing, Workforce	2.113	Property Tax
Hydroelectric Dam and Waterway Workers	1.323	Income Tax
IC-DISC, Dividend Received from an	1.311	Income Tax
IGA Assessments, Oregon Life and Health	1.440	Income Tax
IRA Contributions and Earnings	1.105	Income Tax
Improvement on Tribal Land, Solar	2.084	Property Tax
Imputed Interest Rules	1.013	Income Tax
Inactive Mineral Interests	2.060	Property Tax
Incentives, Regional Economic Development	1.010	Income Tax
Incinerators, Mobile Field	2.034	Property Tax
Income Averaging for Farmers	1.503	Income Tax
Income Credit, Earned	1.406	Income Tax
Income Earned Abroad by U.S. Citizens	1.016	Income Tax
Income Earned in "Indian Country"	1.324	Income Tax
Income Tax Subtraction, Federal	1.328	Income Tax
Income Taxes, Local	1.223	Income Tax
Income, Certain Retirement	1.445	Income Tax
Income, Credit Union	1.036	Income Tax
Income, Federal Pension	1.325	Income Tax
Income, Foreign-Derived Intangible	1.208	Income Tax
Income, Nonresident Disaster Related	1.505	Income Tax
Income, Scholarship and Fellowship	1.001	Income Tax
Income, Tax Rates for Certain Pass-Through	1.502	Income Tax
"Indian Country", Income Earned in	1.324	Income Tax
Indian Reservation Subscribers	8.004	911 and 988 Taxes
Indians and on Tribal Trust Land, Property of	2.075	Property Tax
Individual Development Account Donation (Credit)	1.423	Income Tax
Individual Development Accounts (Exclusion and Subtraction)	1.312	Income Tax
Industrial Property in Rural Areas, New	2.016	Property Tax
Industry Apprenticeship/Training Trust	2.017	Property Tax
Inherited Property, Capital Gains on	1.047	Income Tax
Installment Sales, Gain on Nondealer	1.040	Income Tax
Institutions (Other Tobacco Products), Federal and Veterans	6.001	Other Tobacco Products Tax
Insurance Premiums, Employer Paid Group Life	1.018	Income Tax
Insurance Proceeds, Life	1.049	Income Tax
Insurance, Employer Paid Accident and Disability	1.019	Income Tax
Insurance, Military and Dependents TRICARE	1.029	Income Tax
Insurance, Self-Employment Health	1.103	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Insurers Subject to Retaliatory Tax	9.004	Corporate Activity Tax
Intangible Development Costs for Fuels	1.215	Income Tax
Intangible Income, Foreign-Derived	1.208	Income Tax
Interest Allocation for Banks, Elimination of Tax Exempt	1.037	Income Tax
Interest Rules, Imputed	1.013	Income Tax
Interest and Dividends on U.S. Obligations	1.330	Income Tax
Interest from State and Local Government Bonds	1.316	Income Tax
Interest on Oregon State and Local Debt	1.043	Income Tax
Interest on Savings Bonds, Deferral of	1.053	Income Tax
Interest on Student Loans	1.102	Income Tax
Interest, Home Mortgage	1.210	Income Tax
Interests, Inactive Mineral	2.060	Property Tax
Interests, State and Local	11.001	Oil and Gas Privilege Tax
Interstate Bridges of Local Governments	2.077	Property Tax
Interstate Bridges of Other States or Subdivisions	2.081	Property Tax
Inventory	2.024	Property Tax
Inventory Methods of Valuation	1.031	Income Tax
Invested in Opportunity Zone, Capital Gain	1.011	Income Tax
Investment Advantage, Oregon	1.310	Income Tax
Investment Program, Strategic	2.100	Property Tax
Irrigation Equipment, Center Pivot	2.041	Property Tax
Irrigation, Drainage, Water Supply or Flood Control, Corporations for	2.079	Property Tax
Jobs Initiative, Oregon Low-Income Community	1.417	Income Tax
Judgment or Settlement and Legal Fees, Wildfire	1.318	Income Tax
Kids Credit, Oregon	1.412	Income Tax
LLC Owned by Nonprofit Corporation, Property of	2.092	Property Tax
Labor Payments for Residential Construction, Subcontractor	9.002	Corporate Activity Tax
Labor Rebate, Film Production	1.308	Income Tax
Land Leased From State Land Board	2.045	Property Tax
Land Owned by Nonprofit for Purpose of Building Low-Income Housing	2.008	Property Tax
Land Under Recreation Facility, Federal	2.022	Property Tax
Land Under Summer Homes, Federal	2.021	Property Tax
Land Under Use Permit, ODOT	2.064	Property Tax
Land, Leased Federal Grazing	2.039	Property Tax
Land, Leased State and Local Farming and Grazing	2.038	Property Tax
Land, Mining Claims on Federal	2.061	Property Tax
Land, Nonprofit Public Park Use	2.059	Property Tax
Land, Open Space	2.134	Property Tax
Land, Property of Indians and on Tribal Trust	2.075	Property Tax
Land, Riparian Habitat	2.050	Property Tax
Land, Shellfish Growing on State	2.040	Property Tax
Land, Solar Improvement on Tribal	2.084	Property Tax
Lands, Beach	2.074	Property Tax
Lease from Exempt Owner, Exempt	2.091	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Lease from Taxable Owner, Exempt	2.090	Property Tax
Leased Docks and Airports	2.027	Property Tax
Leased Federal Grazing Land	2.039	Property Tax
Leased From State Land Board, Land	2.045	Property Tax
Leased High-Voltage Electricity Transmission Property, Federally	2.083	Property Tax
Leased Rural Health Care Property	2.006	Property Tax
Leased State and Local Farming and Grazing Land	2.038	Property Tax
Leased Storage Space, Fairground	2.010	Property Tax
Leased Student Housing Publicly Owned	2.003	Property Tax
Legal Fees, Wildfire Judgment or Settlement and	1.318	Income Tax
Legislative Per Diem and Allowance	1.326	Income Tax
Lender's Credit, Energy Conservation	1.432	Income Tax
Lender's Credit, Farmworker Housing	1.413	Income Tax
Lender's Credit, Oregon Affordable Housing	1.424	Income Tax
Lender's Credit, Weatherization	1.437	Income Tax
Libraries for Public Use, Private	2.005	Property Tax
Life Insurance Premiums, Employer Paid Group	1.018	Income Tax
Life Insurance Proceeds	1.049	Income Tax
Life and Health IGA Assessments, Oregon	1.440	Income Tax
Lighting District, Railroad Right of Way in Highway	2.124	Property Tax
Like-Kind Exchanges, Gain on	1.041	Income Tax
Literary, and Scientific Organizations, Charitable,	2.085	Property Tax
Loan Debt, Discharge of Certain Student	1.046	Income Tax
Loans, Interest on Student	1.102	Income Tax
Local Debt, Interest on Oregon State and	1.043	Income Tax
Local Farming and Grazing Land, Leased State and	2.038	Property Tax
Local Government Bonds, Interest from State and	1.316	Income Tax
Local Government Owned Low-Income Housing	2.020	Property Tax
Local Government Public Ways	2.080	Property Tax
Local Governments, Interstate Bridges of	2.077	Property Tax
Local Income Taxes	1.223	Income Tax
Local Interests, State and	11.001	Oil and Gas Privilege Tax
Local Property, State and	2.078	Property Tax
Local Standing Timber Under Contract, State and	2.055	Property Tax
Local Subscribers, State and	8.001	911 and 988 Taxes
Locally Assessed, Watercraft	2.139	Property Tax
Lodging (Nonmilitary), Employee Meals and	1.022	Income Tax
Lodging Paid for by the Federal Government	13.002	Lodging Tax
Logging Equipment, Environmentally Sensitive	2.051	Property Tax
Logging Roads, Private Farm and	2.058	Property Tax
Long Term Care Facilities	2.097	Property Tax
Long Term Rural Enterprise Zone (Property Tax)	2.014	Property Tax
Long Term Rural Enterprise Zone Facilities (Income Tax)	1.418	Income Tax
Loss Carryback, Agriculture Sector Net Operating	1.321	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Loss, Personal Casualty	1.317	Income Tax
Losses, Casualty and Theft	1.222	Income Tax
Lottery Prizes, Oregon State	1.327	Income Tax
Low Income Multi-Unit Rental Housing	2.106	Property Tax
Low-Income Community Jobs Initiative, Oregon	1.417	Income Tax
Low-Income Housing Owned by Religious Organization	2.030	Property Tax
Low-Income Housing, Home Share Program	2.110	Property Tax
Low-Income Housing, Land Owned by Nonprofit for Purpose of Building	2.008	Property Tax
Low-Income Housing, Local Government Owned	2.020	Property Tax
Low-Income Rental Housing, Nonprofit	2.108	Property Tax
Low-Income Rental, Property for	2.107	Property Tax
Machinery and Equipment, Farm	2.033	Property Tax
Magazine Circulation Expenditures	1.219	Income Tax
Management Equipment, Field Burning Smoke	2.043	Property Tax
Manufactured Dwelling Park Capital Gain	1.313	Income Tax
Manufactured Dwelling Park Closure	1.425	Income Tax
Manufactured Dwelling Tenant Payment	1.315	Income Tax
Manufactured Structure in High-Population County	2.071	Property Tax
Manufacturing Facilities, Renewable Resource Equipment	1.416	Income Tax
Manure, Bovine	1.430	Income Tax
Marijuana Purchased for Medical Use	16.001	Marijuana Tax
Marine and Transportation Policies, Wet	1.322	Income Tax
Marital Deduction	15.002	Estate Transfer Tax
Maritime Emergency Response, Equipment for	2.076	Property Tax
Marketing Activities, Wine	7.002	Beer and Wine Taxes
Mass Transit Vehicles, Public	4.007	Weight-Mile Tax
Materials, Ship Repair Facility	2.028	Property Tax
Mausoleums, Cemeteries, Burial Grounds, and	2.088	Property Tax
Meal and Entertainment Expenses	1.027	Income Tax
Meals and Lodging (Nonmilitary), Employee	1.022	Income Tax
Medical Practice, Rural	1.408	Income Tax
Medical Providers, Volunteer Rural Emergency	1.409	Income Tax
Medical Subtraction for Elderly	1.304	Income Tax
Medical Use, Marijuana Purchased for	16.001	Marijuana Tax
Medical and Cafeteria Plan Benefits, Employer Paid	1.007	Income Tax
Medical and Dental Expenses	1.201	Income Tax
Metal Mines, Depletion Costs for	1.319	Income Tax
Metals, Precious	9.003	Corporate Activity Tax
Methods of Valuation, Inventory	1.031	Income Tax
Military Active Duty and Related Pay	1.329	Income Tax
Military and Dependents TRICARE Insurance	1.029	Income Tax
Military and Victims of Terrorism, Disability Benefits of	1.050	Income Tax
Military, Homestead Exemption for Active Duty	2.120	Property Tax
Mineral Interests, Inactive	2.060	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Mines, Depletion Costs for Metal	1.319	Income Tax
Mining Claims on Federal Land	2.061	Property Tax
Miscellaneous Fringe Benefits	1.021	Income Tax
Mobile Field Incinerators	2.034	Property Tax
Modifications (Vehicle Privilege Tax), Certain Vehicle	18.001	Vehicle Privilege Tax
Modifications (Vehicle Use Tax), Certain Vehicle	17.001	Vehicle Use Tax
Mortgage Debt, Cancellation of	1.017	Income Tax
Mortgage Interest, Home	1.210	Income Tax
Motor Vehicles and Trailers	2.063	Property Tax
Moving Expenses	1.106	Income Tax
Multi-Unit Rental Housing in Designated Areas	2.105	Property Tax
Multi-Unit Rental Housing, Low Income	2.106	Property Tax
Multi-Unit Rental Housing, New or Rehabilitated	2.109	Property Tax
Multi-Unit Rental Housing, Use-Restricted	2.126	Property Tax
Multiplex, New ADU or Newly Converted	2.031	Property Tax
National Guard and Reserve Members, Overnight Travel Expenses of	1.107	Income Tax
Natural Gas Pipeline Extension	2.046	Property Tax
Natural Resource and Fishing Property (Credit)	15.005	Estate Transfer Tax
Natural Resource and Fishing Property (Deduction)	15.003	Estate Transfer Tax
Net Operating Loss Carryback, Agriculture Sector	1.321	Income Tax
New ADU or Newly Converted Multiplex	2.031	Property Tax
New Industrial Property in Rural Areas	2.016	Property Tax
New Rural Health Care Facilities	2.096	Property Tax
New or Rehabilitated Multi-Unit Rental Housing	2.109	Property Tax
Nondealer Installment Sales, Gain on	1.040	Income Tax
Nonprofit Corporation, Property of LLC Owned by	2.092	Property Tax
Nonprofit Elderly Housing State Funded	2.023	Property Tax
Nonprofit Elderly Housing, Veterans in	2.112	Property Tax
Nonprofit Electrical Distribution Associations	2.068	Property Tax
Nonprofit Housing for the Elderly	2.127	Property Tax
Nonprofit Low-Income Rental Housing	2.108	Property Tax
Nonprofit Public Park Use Land	2.059	Property Tax
Nonprofit Sewage Treatment Facilities	2.049	Property Tax
Nonprofit Water Associations	2.067	Property Tax
Nonprofit for Purpose of Building Low-Income Housing, Land Owned by	2.008	Property Tax
Nonresident Armed Forces	1.507	Income Tax
Nonresident Disaster Related Income	1.505	Income Tax
Nonresident Spouse of Nonresident Servicemember Serving in Oregon	1.508	Income Tax
Nursery Stock	2.037	Property Tax
ODOT Land Under Use Permit	2.064	Property Tax
Obligations, Interest and Dividends on U.S.	1.330	Income Tax
Office of Child Care, Contributions to	1.422	Income Tax
Officer, Surviving Spouse of Public Safety	2.121	Property Tax
On-Site Gyms, Employer Provided	1.020	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Open Space Land	2.134	Property Tax
Operating Loss Carryback, Agriculture Sector Net	1.321	Income Tax
Operations, Farming	4.001	Weight-Mile Tax
Opportunity Grant Fund Contributions	1.403	Income Tax
Opportunity Zone, Capital Gain Invested in	1.011	Income Tax
Oregon 529 College Savings Network	1.301	Income Tax
Oregon Affordable Housing Lender's Credit	1.424	Income Tax
Oregon Cultural Trust	1.442	Income Tax
Oregon Grapes for Wine Without Oregon Designation or AVA	7.003	Beer and Wine Taxes
Oregon Investment Advantage	1.310	Income Tax
Oregon Kids Credit	1.412	Income Tax
Oregon Life and Health IGA Assessments	1.440	Income Tax
Oregon Low-Income Community Jobs Initiative	1.417	Income Tax
Oregon State Lottery Prizes	1.327	Income Tax
Oregon State and Local Debt, Interest on	1.043	Income Tax
Oregon Telephone Assistance Program	8.002	911 and 988 Taxes
Oregon Veterans' Home	12.002	Medical Provider Taxes
Oregon Veterans' Home Physicians	1.444	Income Tax
Oregon, Nonresident Spouse of Nonresident Servicemember Serving in	1.508	Income Tax
Organization, Low-Income Housing Owned by Religious	2.030	Property Tax
Organizations, Charitable	4.008	Weight-Mile Tax
Organizations, Charitable, Literary, and Scientific	2.085	Property Tax
Organizations, Fraternal	2.086	Property Tax
Organizations, Religious	2.087	Property Tax
Overnight Travel Expenses of National Guard and Reserve Members	1.107	Income Tax
Overtime, Agricultural Worker	1.428	Income Tax
Owner Forest Conservation (Estate Transfer Tax), Small Forest	15.006	Estate Transfer Tax
Owner, Exempt Lease from Exempt	2.091	Property Tax
Owner, Exempt Lease from Taxable	2.090	Property Tax
Ownership Plans, Employee Stock	1.023	Income Tax
Park Closure, Manufactured Dwelling	1.425	Income Tax
Park Use Land, Nonprofit Public	2.059	Property Tax
Parking Space, Higher Education	2.004	Property Tax
Partnerships, Pass-Through Status of Specified Publicly Traded	1.033	Income Tax
Pass-Through Income, Tax Rates for Certain	1.502	Income Tax
Pass-Through Status of Specified Publicly Traded Partnerships	1.033	Income Tax
Passenger Railroad, Amtrak	2.094	Property Tax
Pay, Combat	1.052	Income Tax
Pay, Military Active Duty and Related	1.329	Income Tax
Payment, Manufactured Dwelling Tenant	1.315	Income Tax
Payments, Certain Foster Care	1.004	Income Tax
Payments, Deferral of Certain Advance	1.054	Income Tax
Pension Contributions and Earnings	1.008	Income Tax
Pension Income, Federal	1.325	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Permit, ODOT Land Under Use	2.064	Property Tax
Personal Casualty Loss	1.317	Income Tax
Personal Exemption	1.443	Income Tax
Personal Property and Residential Floating Structures, Business	2.025	Property Tax
Personal Property for Personal Use	2.072	Property Tax
Personnel, Benefits and Allowances of Armed Forces	1.051	Income Tax
Pharmacies, Sales of Prescription Drugs by Eligible	9.001	Corporate Activity Tax
Physicians, Oregon Veterans' Home	1.444	Income Tax
Pipeline Extension, Natural Gas	2.046	Property Tax
Plan Benefits, Employer Paid Medical and Cafeteria	1.007	Income Tax
Plans, Employee Stock Ownership	1.023	Income Tax
Plants, and Fruit Trees, Crops,	2.035	Property Tax
Policies, Wet Marine and Transportation	1.322	Income Tax
Political Contributions	1.441	Income Tax
Pollution Control Facilities	2.117	Property Tax
Pollution Control Facilities, Amortization of Air	1.216	Income Tax
Practice, Rural Medical	1.408	Income Tax
Precious Metals	9.003	Corporate Activity Tax
Premiums, Employer Paid Group Life Insurance	1.018	Income Tax
Prepayment Agreement, Facilities with	2.098	Property Tax
Prescription Drugs by Eligible Pharmacies, Sales of	9.001	Corporate Activity Tax
Private Farm and Logging Roads	2.058	Property Tax
Private Forestland, Eastern	2.137	Property Tax
Private Forestland, Western	2.136	Property Tax
Private Libraries for Public Use	2.005	Property Tax
Private Standing Timber, Eastern	2.057	Property Tax
Private Standing Timber, Western	2.056	Property Tax
Prizes, Oregon State Lottery	1.327	Income Tax
Proceeds, Life Insurance	1.049	Income Tax
Processing Equipment, Food	2.032	Property Tax
Production Costs, Deduction of Certain Film and Television	1.203	Income Tax
Production Development Contributions, Film	1.415	Income Tax
Production Labor Rebate, Film	1.308	Income Tax
Products: Gasoline, Forest	3.001	Gas, Use, and Jet Fuel Taxes
Products: Other than Gasoline, Forest	3.002	Gas, Use, and Jet Fuel Taxes
Program Low-Income Housing, Home Share	2.110	Property Tax
Program, Oregon Telephone Assistance	8.002	911 and 988 Taxes
Program, Strategic Investment	2.100	Property Tax
Projects Receiving Grant, Affordable Housing	2.115	Property Tax
Projects, Energy Conservation	1.436	Income Tax
Projects, Solar	2.047	Property Tax
Projects, Transportation	1.433	Income Tax
Properties, Housing Authority Rental	2.019	Property Tax
Property (Credit), Natural Resource and Fishing	15.005	Estate Transfer Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Property (Deduction), Natural Resource and Fishing	15.003	Estate Transfer Tax
Property Taxes	1.211	Income Tax
Property Taxes Paid, Credit for	11.002	Oil and Gas Privilege Tax
Property Used Exclusively for Tribal Government Services	2.082	Property Tax
Property Used for Disaster or Emergency Related Work	2.069	Property Tax
Property and Residential Floating Structures, Business Personal	2.025	Property Tax
Property for Low-Income Rental	2.107	Property Tax
Property for Personal Use, Personal	2.072	Property Tax
Property in Rural Areas, New Industrial	2.016	Property Tax
Property of Indians and on Tribal Trust Land	2.075	Property Tax
Property of LLC Owned by Nonprofit Corporation	2.092	Property Tax
Property, Capital Gains from Farm	1.504	Income Tax
Property, Capital Gains on Inherited	1.047	Income Tax
Property, Certain Communication Related	2.099	Property Tax
Property, Destroyed or Damaged	2.140	Property Tax
Property, Federal	2.093	Property Tax
Property, Federally Leased High-Voltage Electricity Transmission	2.083	Property Tax
Property, Historic	2.131	Property Tax
Property, Leased Rural Health Care	2.006	Property Tax
Property, State and Local	2.078	Property Tax
Provided Dependent Care, Employer	1.014	Income Tax
Provided Education Benefits, Employer	1.025	Income Tax
Provided On-Site Gyms, Employer	1.020	Income Tax
Provided Scholarships, Employer	1.401	Income Tax
Public Mass Transit Vehicles	4.007	Weight-Mile Tax
Public Park Use Land, Nonprofit	2.059	Property Tax
Public Safety Officer, Surviving Spouse of	2.121	Property Tax
Public Services	3.005	Gas, Use, and Jet Fuel Taxes
Public Transportation	3.006	Gas, Use, and Jet Fuel Taxes
Public University Venture Development Fund	1.420	Income Tax
Public Use, Private Libraries for	2.005	Property Tax
Public Warehouse Sales Throwback Exemption	1.501	Income Tax
Public Ways, Local Government	2.080	Property Tax
Publicly Owned, Leased Student Housing	2.003	Property Tax
Publicly Supported Housing Seller's Credit	1.427	Income Tax
Publicly Traded Partnerships, Pass-Through Status of Specified	1.033	Income Tax
Qualified Education Savings (Federal)	1.002	Income Tax
Qualified Research Expenses for Semiconductor Companies	1.426	Income Tax
Railroad Cars Being Repaired	2.029	Property Tax
Railroad Rehabilitation, Short Line	1.439	Income Tax
Railroad Right of Way in Highway Lighting District	2.124	Property Tax
Railroad Right of Way in Rural Fire District	2.125	Property Tax
Railroad Right of Way in Water District	2.123	Property Tax
Railroad, Amtrak Passenger	2.094	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Rates for Certain Pass-Through Income, Tax	1.502	Income Tax
Rebate, Film Production Labor	1.308	Income Tax
Rebuilt After 2020 Wildfires, Homes	2.128	Property Tax
Received from an IC-DISC, Dividend	1.311	Income Tax
Recreation Facility, Federal Land Under	2.022	Property Tax
Reduction, Exclusion of Employer-Provided Tuition	1.003	Income Tax
Reforestation Costs, Expensing and Amortization of	1.218	Income Tax
Regional Economic Development Incentives	1.010	Income Tax
Rehabilitated Housing	2.104	Property Tax
Rehabilitated Multi-Unit Rental Housing, New or	2.109	Property Tax
Rehabilitation, Short Line Railroad	1.439	Income Tax
Religious Organization, Low-Income Housing Owned by	2.030	Property Tax
Religious Organizations	2.087	Property Tax
Removal of Architectural Barriers	1.202	Income Tax
Renewable Energy Development Zone, Rural	2.018	Property Tax
Renewable Resource Equipment Manufacturing Facilities	1.416	Income Tax
Renewables, Business Energy Facilities, Conservation and	1.435	Income Tax
Rental Allowances for Clergy Housing	1.045	Income Tax
Rental Housing in Designated Areas, Multi-Unit	2.105	Property Tax
Rental Housing, Accelerated Depreciation of	1.209	Income Tax
Rental Housing, Low Income Multi-Unit	2.106	Property Tax
Rental Housing, New or Rehabilitated Multi-Unit	2.109	Property Tax
Rental Housing, Nonprofit Low-Income	2.108	Property Tax
Rental Housing, Use-Restricted Multi-Unit	2.126	Property Tax
Rental Properties, Housing Authority	2.019	Property Tax
Rental, Heavy Equipment	2.073	Property Tax
Rental, Property for Low-Income	2.107	Property Tax
Repair Facility Materials, Ship	2.028	Property Tax
Repaired, Railroad Cars Being	2.029	Property Tax
Research Expenses for Semiconductor Companies, Qualified	1.426	Income Tax
Reservation Enterprise Zone (Income Tax)	1.419	Income Tax
Reservation Subscribers, Indian	8.004	911 and 988 Taxes
Residential Construction, Subcontractor Labor Payments for	9.002	Corporate Activity Tax
Residential Floating Structures, Business Personal Property and	2.025	Property Tax
Resource Equipment Manufacturing Facilities, Renewable	1.416	Income Tax
Resource and Fishing Property (Credit), Natural	15.005	Estate Transfer Tax
Retaliatory Tax, Insurers Subject to	9.004	Corporate Activity Tax
Retirement Income, Certain	1.445	Income Tax
Revenue from Government Leased Lines	10.001	Electric Cooperative Tax
Right of Way in Highway Lighting District, Railroad	2.124	Property Tax
Right of Way in Rural Fire District, Railroad	2.125	Property Tax
Right of Way in Water District, Railroad	2.123	Property Tax
Riparian Habitat Land	2.050	Property Tax
Roads, Forest Products on County	4.002	Weight-Mile Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Roads, Private Farm and Logging	2.058	Property Tax
Rules, Completed Contract	1.220	Income Tax
Rules, Imputed Interest	1.013	Income Tax
Rural Areas, New Industrial Property in	2.016	Property Tax
Rural Emergency Medical Providers, Volunteer	1.409	Income Tax
Rural Enterprise Zone (Property Tax), Long Term	2.014	Property Tax
Rural Enterprise Zone Facilities (Income Tax), Long Term	1.418	Income Tax
Rural Fire District, Railroad Right of Way in	2.125	Property Tax
Rural Health Care Facilities, New	2.096	Property Tax
Rural Health Care Property, Leased	2.006	Property Tax
Rural Medical Practice	1.408	Income Tax
Rural Renewable Energy Development Zone	2.018	Property Tax
Sales Throwback Exemption, Public Warehouse	1.501	Income Tax
Sales of Prescription Drugs by Eligible Pharmacies	9.001	Corporate Activity Tax
Sales, Capital Gains on Home	1.015	Income Tax
Sales, Gain on Nondealer Installment	1.040	Income Tax
Savings (Federal), Qualified Education	1.002	Income Tax
Savings Accounts, Health	1.104	Income Tax
Savings Bonds, Deferral of Interest on	1.053	Income Tax
Savings, First-time Home Buyer	1.314	Income Tax
Scholarship Awards Used for Housing Expenses	1.302	Income Tax
Scholarship and Fellowship Income	1.001	Income Tax
Scholarships, Employer Provided	1.401	Income Tax
School Vehicles, Elementary and Secondary	4.004	Weight-Mile Tax
Scientific Organizations, Charitable, Literary, and	2.085	Property Tax
Screening Devices, Fish	1.438	Income Tax
Secondary School Vehicles, Elementary and	4.004	Weight-Mile Tax
Section 179 Expensing Allowances	1.206	Income Tax
Sector Net Operating Loss Carryback, Agriculture	1.321	Income Tax
Security Benefits (Federal), Social	1.009	Income Tax
Security Benefits (Oregon), Social	1.307	Income Tax
Seismic Upgrades	2.122	Property Tax
Self-Employment Health Insurance	1.103	Income Tax
Seller's Credit, Publicly Supported Housing	1.427	Income Tax
Semiconductor Companies, Qualified Research Expenses for	1.426	Income Tax
Senior Services Centers	2.007	Property Tax
Sensitive Logging Equipment, Environmentally	2.051	Property Tax
Servicemember Serving in Oregon, Nonresident Spouse of Nonresident	1.508	Income Tax
Services Centers, Senior	2.007	Property Tax
Services, Property Used Exclusively for Tribal Government	2.082	Property Tax
Services, Public	3.005	Gas, Use, and Jet Fuel Taxes
Services, Veterans' Benefits and	1.028	Income Tax
Settlement and Legal Fees, Wildfire Judgment or	1.318	Income Tax
Severe Disability	1.410	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Sewage Treatment Facilities, Nonprofit	2.049	Property Tax
Shellfish Growing on State Land	2.040	Property Tax
Ship Repair Facility Materials	2.028	Property Tax
Short Line Railroad Rehabilitation	1.439	Income Tax
Single-Unit Housing, Certain	2.103	Property Tax
Skyline and Swing Yarders	2.052	Property Tax
Small Business Stock, Exclusion of Gain from Certain	1.012	Income Tax
Small Forest Owner Forest Conservation (Estate Transfer Tax)	15.006	Estate Transfer Tax
Small Forest Owner Forest Conservation (Income Tax)	1.429	Income Tax
Small Quantity by Consumers	5.001	Cigarette Tax
Small Tract Forestland Option	2.138	Property Tax
Small Watercraft	2.062	Property Tax
Small Wineries	7.001	Beer and Wine Taxes
Smoke Management Equipment, Field Burning	2.043	Property Tax
Social Security Benefits (Federal)	1.009	Income Tax
Social Security Benefits (Oregon)	1.307	Income Tax
Soil Conditioner Costs, Fertilizer and	1.213	Income Tax
Soil and Water Conservation Expenditures	1.212	Income Tax
Solar Improvement on Tribal Land	2.084	Property Tax
Solar Projects	2.047	Property Tax
Sold for Out of State Use, Vehicles	18.003	Vehicle Privilege Tax
Sororities, and Cooperatives, Fraternities,	2.095	Property Tax
Special Valuation	15.007	Estate Transfer Tax
Sports Facility, City Owned	2.089	Property Tax
Spouse of Nonresident Servicemember Serving in Oregon, Nonresident	1.508	Income Tax
Spouse of Public Safety Officer, Surviving	2.121	Property Tax
Spouses of Veterans, Disabled Veterans or Surviving	2.111	Property Tax
Spread on Acquisition of Stock	1.026	Income Tax
Start-Up Costs, Amortization of Business	1.207	Income Tax
State Funded, Nonprofit Elderly Housing	2.023	Property Tax
State Land Board, Land Leased From	2.045	Property Tax
State Land, Shellfish Growing on	2.040	Property Tax
State Use, Vehicles Sold for Out of	18.003	Vehicle Privilege Tax
State and Local Debt, Interest on Oregon	1.043	Income Tax
State and Local Farming and Grazing Land, Leased	2.038	Property Tax
State and Local Government Bonds, Interest from	1.316	Income Tax
State and Local Interests	11.001	Oil and Gas Privilege Tax
State and Local Property	2.078	Property Tax
State and Local Standing Timber Under Contract	2.055	Property Tax
State and Local Subscribers	8.001	911 and 988 Taxes
States or Subdivisions, Interstate Bridges of Other	2.081	Property Tax
Stock Ownership Plans, Employee	1.023	Income Tax
Stock, Exclusion of Gain from Certain Small Business	1.012	Income Tax
Stock, Nursery	2.037	Property Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Stock, Spread on Acquisition of	1.026	Income Tax
Storage Space, Fairground Leased	2.010	Property Tax
Strategic Investment Program	2.100	Property Tax
Structure in High-Population County, Manufactured	2.071	Property Tax
Structures, Business Personal Property and Residential Floating	2.025	Property Tax
Student Housing Furnishings	2.002	Property Tax
Student Housing Publicly Owned, Leased	2.003	Property Tax
Student Housing, Academies, Day Care, and	2.001	Property Tax
Student Loan Debt, Discharge of Certain	1.046	Income Tax
Student Loans, Interest on	1.102	Income Tax
Subcontractor Labor Payments for Residential Construction	9.002	Corporate Activity Tax
Subdivisions, Interstate Bridges of Other States or	2.081	Property Tax
Subscribers, Federal	8.003	911 and 988 Taxes
Subscribers, Indian Reservation	8.004	911 and 988 Taxes
Subscribers, State and Local	8.001	911 and 988 Taxes
Subsidies (Federal), Energy Conservation	1.032	Income Tax
Subsidies (Oregon), Energy Conservation	1.320	Income Tax
Subtraction for Elderly, Medical	1.304	Income Tax
Subtraction, Federal Income Tax	1.328	Income Tax
Summer Homes, Federal Land Under	2.021	Property Tax
Supported Housing Seller's Credit, Publicly	1.427	Income Tax
Surviving Spouse of Public Safety Officer	2.121	Property Tax
Surviving Spouses of Veterans, Disabled Veterans or	2.111	Property Tax
Swing Yarders, Skyline and	2.052	Property Tax
Systems, Alternative Energy	2.116	Property Tax
TRICARE Insurance, Military and Dependents	1.029	Income Tax
Taxable Owner, Exempt Lease from	2.090	Property Tax
Teacher Classroom Expenses	1.101	Income Tax
Telecommunication Companies, Apportionment for Utility and	1.506	Income Tax
Telephone Assistance Program, Oregon	8.002	911 and 988 Taxes
Television Production Costs, Deduction of Certain Film and	1.203	Income Tax
Tenant Payment, Manufactured Dwelling	1.315	Income Tax
Terrorism, Disability Benefits of Military and Victims of	1.050	Income Tax
Testing Emissions (Gas and Use Fuel Taxes), Vehicle Used for	3.003	Gas, Use, and Jet Fuel Taxes
Testing Emissions (Weight-Mile Tax), Vehicle Used for	4.003	Weight-Mile Tax
Theft Losses, Casualty and	1.222	Income Tax
Timber Under Contract, Federal Standing	2.054	Property Tax
Timber Under Contract, State and Local Standing	2.055	Property Tax
Timber, Eastern Private Standing	2.057	Property Tax
Timber, Western Private Standing	2.056	Property Tax
Timber-Growing Costs, Expensing	1.217	Income Tax
Tollways and Related Facilities	2.065	Property Tax
Training, Employee	1.404	Income Tax
Transit Vehicles, Public Mass	4.007	Weight-Mile Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Transmission Property, Federally Leased High-Voltage Electricity	2.083	Property Tax
Transportation Benefits, Employer Paid	1.034	Income Tax
Transportation Companies, Aircraft Under 75,000 Pounds Owned by Air	2.119	Property Tax
Transportation Companies, Foreign-Owned Aircraft and Aircraft Not Owned by Air	2.066	Property Tax
Transportation Policies, Wet Marine and	1.322	Income Tax
Transportation Projects	1.433	Income Tax
Transportation, Public	3.006	Gas, Use, and Jet Fuel Taxes
Travel Expenses of National Guard and Reserve Members, Overnight	1.107	Income Tax
Treatment Facilities, Nonprofit Sewage	2.049	Property Tax
Trees, Crops, Plants, and Fruit	2.035	Property Tax
Tribal Government Services, Property Used Exclusively for	2.082	Property Tax
Tribal Land, Solar Improvement on	2.084	Property Tax
Tribal Trust Land, Property of Indians and on	2.075	Property Tax
Tribes, Vehicles Purchased by the Federal Government or	17.002	Vehicle Use Tax
Tuition Reduction, Exclusion of Employer-Provided	1.003	Income Tax
Type A and B Hospitals	12.003	Medical Provider Taxes
U.S. Citizens, Income Earned Abroad by	1.016	Income Tax
U.S. Obligations, Interest and Dividends on	1.330	Income Tax
Units, Exempt Dwelling	13.001	Lodging Tax
University Venture Development Fund, Public	1.420	Income Tax
Use-Restricted Multi-Unit Rental Housing	2.126	Property Tax
Utility and Telecommunication Companies, Apportionment for	1.506	Income Tax
Valuation, Inventory Methods of	1.031	Income Tax
Valuation, Special	15.007	Estate Transfer Tax
Vehicle Modifications (Vehicle Privilege Tax), Certain	18.001	Vehicle Privilege Tax
Vehicle Modifications (Vehicle Use Tax), Certain	17.001	Vehicle Use Tax
Vehicle Used for Testing Emissions (Gas and Use Fuel Taxes)	3.003	Gas, Use, and Jet Fuel Taxes
Vehicle Used for Testing Emissions (Weight-Mile Tax)	4.003	Weight-Mile Tax
Vehicles Purchased by the Federal Government or Tribes	17.002	Vehicle Use Tax
Vehicles Sold at Auction	18.002	Vehicle Privilege Tax
Vehicles Sold for Out of State Use	18.003	Vehicle Privilege Tax
Vehicles and Trailers, Motor	2.063	Property Tax
Vehicles, Elementary and Secondary School	4.004	Weight-Mile Tax
Vehicles, Government Owned or Operated	4.006	Weight-Mile Tax
Vehicles, Public Mass Transit	4.007	Weight-Mile Tax
Venture Development Fund, Public University	1.420	Income Tax
Vertical Housing Development Zone	2.102	Property Tax
Veterans Institutions (Cigarette), Federal and	5.002	Cigarette Tax
Veterans Institutions (Other Tobacco Products), Federal and	6.001	Other Tobacco Products Tax
Veterans in Nonprofit Elderly Housing	2.112	Property Tax
Veterans or Surviving Spouses of Veterans, Disabled	2.111	Property Tax
Veterans' Benefits and Services	1.028	Income Tax
Veterans' Home Physicians, Oregon	1.444	Income Tax

Index of Tax Expenditures by Keyword

Keyword	Tax Expenditure Number	Tax Program
Veterans' Home, Oregon	12.002	Medical Provider Taxes
Victims of Terrorism, Disability Benefits of Military and	1.050	Income Tax
Voluntary Employees' Beneficiary Associations	1.044	Income Tax
Volunteer Rural Emergency Medical Providers	1.409	Income Tax
Warehouse Sales Throwback Exemption, Public	1.501	Income Tax
Water Associations, Nonprofit	2.067	Property Tax
Water Conservation Expenditures, Soil and	1.212	Income Tax
Water District, Railroad Right of Way in	2.123	Property Tax
Water Supply or Flood Control, Corporations for Irrigation, Drainage,	2.079	Property Tax
Watercraft Centrally Assessed	2.118	Property Tax
Watercraft Locally Assessed	2.139	Property Tax
Watercraft, Small	2.062	Property Tax
Waterway Workers, Hydroelectric Dam and	1.323	Income Tax
Weatherization Lender's Credit	1.437	Income Tax
Western Private Forestland	2.136	Property Tax
Western Private Standing Timber	2.056	Property Tax
Wet Marine and Transportation Policies	1.322	Income Tax
Wildfire Judgment or Settlement and Legal Fees	1.318	Income Tax
Wildfires, Homes Rebuilt After 2020	2.128	Property Tax
Wildlife Habitat	2.132	Property Tax
Wine Marketing Activities	7.002	Beer and Wine Taxes
Wine Without Oregon Designation or AVA, Oregon Grapes for	7.003	Beer and Wine Taxes
Wineries, Small	7.001	Beer and Wine Taxes
Worker Overtime, Agricultural	1.428	Income Tax
Workers' Compensation Benefits (Medical)	1.038	Income Tax
Workers' Compensation Benefits (Nonmedical)	1.039	Income Tax
Workers, Hydroelectric Dam and Waterway	1.323	Income Tax
Workforce Housing	2.113	Property Tax
Workforce Housing Construction, Agriculture	1.414	Income Tax
Working Family Household and Dependent Care	1.421	Income Tax



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