

spending¹⁶⁴³ and receipts are assumed to operate in the manner specified in those laws for each such year and funding for entitlement authority¹⁶⁴⁴ is assumed to be adequate to make all payments required by those laws.¹⁶⁴⁵

¹⁶⁴³ Section 250(c)(8) defines "direct spending." *See supra* p. 444.

¹⁶⁴⁴ Section 3(9) of the Congressional Budget Act (*see supra* p. 18) defines "entitlement authority" to mean (at least for purposes of that Act) the authority described in section 401(c)(2)(C) of that Act (*see supra* p. 252). Section 250(c)(18) of Gramm-Rudman-Hollings (*see supra* p. 447) provides that all references to entitlement authority shall include the mandatory appropriations accounts listed *supra* note 1245.

¹⁶⁴⁵ Senator Bill Bradley criticized the treatment of expiring tax provisions under this paragraph during discussion of an amendment by Senator John Chafee (*see* 139 CONG. REC. S12,254 (daily ed. Aug. 11, 1992)) to strike the individual retirement account provisions of the Revenue Act of 1992, H.R. 11, 102d Cong., 2d Sess., 138 CONG. REC. S12,120, S12,129-30 (daily ed. Aug. 11, 1992) (as reported to the Senate):

What I would like to do is to show some of the folly of the 1990 Budget [Enforcement] Act by explaining why, technically, we do not have an increase in the deficit in the out years with this [individual retirement account] provision.

Under the 1990 Budget [Enforcement] Act, if Congress enacted a provision that raised revenue but expired beyond 5 years, when that provision expired it would not increase the deficit according to the . . . Budget [Enforcement] Act of 1990. The baseline for revenues would simply be dropped. Even though obviously the deficit would dramatically increase.

Let me illustrate this by an absurd hypothetical. But it is relevant to this bill and relevant to our calculations as to whether [the individual retirement account provision] loses money in the long run.

Let us assume that we passed a law that says the entire income tax will expire in 6 years[.] We all know if the entire income tax expired in 6 years we would have \$500 billion less.

Oh, no, no, not according to the Budget [Enforcement] Act of 1990. If we decided we were going to renew it, not let it expire, but continue it, say in year 3, we would be credited with raising \$500 billion. It is an absurdity upon an absurdity. Yet that is the rule we are operating under now. So here we have an [individual retirement account] provision that has a deficit explosion out there waiting in our future and the argument is, no, no, it does not increase the deficit.

(continued...)