# **Optimal Labor Income Taxation**

#### Economía Pública: Impuestos Clase 2

Dario Tortarolo DECRG, World Bank "The hardest thing in the world to understand is the income tax."

- Albert Einstein

### **GOALS OF NEXT TWO LECTURES**

To prove Einstein wrong!

1) Understand the core **optimal income tax model**: linear and nonlinear taxes in the Saez (2001) framework  $\blacktriangleright$ 

- Understand the equity-efficiency trade-off
- Revenue-maximizing tax rate (Laffer curve)
- Optimal linear tax rate formula
- Optimal top tax rate

2) Study the optimal design of transfer programs

- With only intensive margin responses
- Introduce extensive margin responses
- Tagging and in-kind programs

# Non-linear income tax schedule in Argentina 2023



#### TAXATION AND REDISTRIBUTION

**Key question:** By how much should government reduce inequality using taxes and transfers?

1) Governments use **taxes** to raise revenue and fund **transfer** programs which can reduce **inequality** in disposable income

2) Taxes (and transfers) create economic **inefficiency** if individuals are very responsive (work less, avoid/evade taxes)

Size of **behavioural response** limits the ability of government to redistribute with taxes/transfers

Let's study the standard optimal model to see why...

### **KEY CONCEPTS FOR TAXES/TRANSFERS**

Draw budget (z, z - T(z)) which integrates taxes and transfers

1) Transfer benefit with zero earnings -T(0) [sometimes called demogrant or lumpsum grant]

2) Marginal tax rate (or phasing-out rate) T'(z): individual keeps 1 - T'(z) for an additional \$1 of earnings (matters for intensive labor supply response)

3) Participation tax rate (PTR)  $\tau_p = [T(z) - T(0)]/z$ : individual keeps fraction  $1 - \tau_p$  of earnings when moving from zero earnings to earnings z (matters for extensive labor supply response):

$$z - T(z) = -T(0) + z - [T(z) - T(0)] = -T(0) + z \cdot (1 - \tau_p)$$

4) Break-even earnings point  $z^*$ : point at which  $T(z^*) = 0$ 







US Tax/Transfer System, single parent with 2 children, 2009

Source: Computations made by Emmanuel Saez using tax and transfer system parameters



Source: Piketty, Thomas, and Emmanuel Saez (2012)

#### Profile of Current Means-tested Transfers

Traditional means-tested programs reduce incentives to work for low income workers

Refundable tax credits have significantly increased incentive to work for low income workers

However, refundable tax credits cannot benefit those with zero earnings

Trade-off: US chooses to reward work more than most European countries (such as France or the UK) but therefore provides smaller benefits to those with no earnings

# **OPTIMAL INCOME TAXATION**

▶ Goals

Optimal Taxation: Case with No Behavioral Responses

- Utility u(c) strictly increasing and concave on after-tax income c.
  Same u(c) for everybody
- Income z is fixed for each individual, c = z T(z) where T(z) is tax/transfer on z (tax if T(z) > 0, transfer if T(z) < 0)</p>
- *N* individuals with fixed incomes  $z_1 < ... < z_N$
- Government maximizes **Utilitarian** objective:  $SWF = \sum_{i=1}^{N} u(z_i - T(z_i))$  subject to **budget constraint**  $\sum_{i=1}^{N} T(z_i) = 0$  (taxes need to fund transfers)

### Simple Model With No Behavioral Responses

Replace  $T(z_1) = -\sum_{i=2}^{N} T(z_i)$  from budget constraint:

$$SWF = u\left(z_1 + \sum_{i=2}^{N} T(z_i)\right) + \sum_{i=2}^{N} u(z_i - T(z_i))$$

First order condition (FOC) in  $T(z_j)$  for a given j = 2, .., N:

$$0 = \frac{\partial SWF}{\partial T(z_j)} = u'\left(z_1 + \sum_{i=2}^N T(z_i)\right) - u'(z_j - T(z_j)) = 0 \Rightarrow$$

 $u'(z_j - T(z_j)) = u'(z_1 - T(z_1)) \Rightarrow z_j - T(z_j) = \text{constant for } j = 1, .., N$ 

Perfect equalization of after-tax income = 100% MTR and redistrib

Utilitarianism with decreasing marginal utility leads to perfect egalitarianism [Edgeworth, 1897]

#### Simpler Derivation with just 2 individuals

 $\max SWF = u(z_1 - T(z_1)) + u(z_2 - T(z_2)) \text{ s.t. } T(z_1) + T(z_2) = 0$ Replace  $T(z_1) = -T(z_2)$  in SWF using budget constraint:

$$SWF = u(z_1 + T(z_2)) + u(z_2 - T(z_2))$$

First order condition (FOC) in  $T(z_2)$ :

$$0 = \frac{dSWF}{dT(z_2)} = u'(z_1 + T(z_2)) - u'(z_2 - T(z_2)) = 0 \Rightarrow$$

 $u'(z_1 + T(z_2)) = u'(z_2 - T(z_2)) \Rightarrow u'(z_1 - T(z_1)) = u'(z_2 - T(z_2))$ 

 $\Rightarrow z_1 - T(z_1) = z_2 - T(z_2)$  constant across the 2 individuals

Perfect equalization of after-tax income = 100% marginal tax rate and redistribution [see graph]



### Optimal Tax/Transfer Systems



#### **ISSUES WITH SIMPLE MODEL**

1) No behavioral responses: Obvious missing piece: 100% redistribution would destroy incentives to work and thus the assumption that z is exogenous is unrealistic

 $\Rightarrow$  Optimal income tax theory incorporates behavioral responses

2) **Issue with Utilitarianism:** Even absent behavioral responses, many people would object to 100% redistribution [perceived as confiscatory]

 $\Rightarrow$  Citizens' views on fairness impose **bounds** on redistribution govt can do [political economy / public choice theory]

# EQUITY-EFFICIENCY TRADE-OFF

Taxes can be used to raise revenue for transfer programs which can reduce **inequality** in disposable income

 $\Rightarrow$  Desirable if society feels that inequality is too large

Taxes (and transfers) reduce **incentives** to work

⇒ High tax rates create economic inefficiency if individuals respond to taxes

Size of **behavioral response** limits the ability of government to redistribute with taxes/transfers

 $\Rightarrow$  Generates an equity-efficiency trade-off

Empirical tax literature estimates the size of behavioral responses

### Optimal Tax/Transfer Systems



## LABOR SUPPLY THEORY

Individual has utility over labor supply l and consumption c: u(c, l) increasing in c and decreasing in l [= increasing in leisure]

$$\max_{c,l} u(c,l) \quad \text{subject to} \quad c = w \cdot l + R$$

with  $w = \bar{w} \cdot (1 - \tau)$  the net-of-tax wage ( $\bar{w}$  is before tax wage rate and  $\tau$  is tax rate), and R non-labor income

FOC  $w \frac{\partial u}{\partial c} + \frac{\partial u}{\partial l} = 0$  defines Marshallian labor supply l = l(w, R)

Uncompensated labor supply elasticity:  $\varepsilon^{u} = \frac{w}{l} \cdot \frac{\partial l}{\partial w}$ 

**Income effects:**  $\eta = w \frac{\partial I}{\partial R} \le 0$  (if leisure is a normal good)









# Labor Supply Theory

**Substitution effects:** Hicksian labor supply:  $l^{c}(w, u)$  minimizes cost needed to reach u given slope  $w \Rightarrow$ 

**Compensated elasticity:**  $\varepsilon^{c} = \frac{w}{l} \cdot \frac{\partial l^{c}}{\partial w} > 0$ **Slutsky equation:**  $\frac{\partial l}{\partial w} = \frac{\partial l^{c}}{\partial w} + l \frac{\partial l}{\partial R} \Rightarrow \varepsilon^{u} = \varepsilon^{c} + \eta$ 

Marginal tax rate  $\tau$  discourages work through substitution effects (working pays less at the margin)

Marginal tax rate  $\tau$  encourages work through income effects (taxes make you poorer and hence in more need of income)

Net effect ambiguous (captured by sign of  $\varepsilon^{u}$ )















#### General nonlinear income tax

With no taxes: c = z (consumption = earnings)

With taxes c = z - T(z) (consumption = earnings - net taxes)

 $T(z) \ge 0$  if individual pays taxes on net,  $T(z) \le 0$  if individual receives transfers on net

T'(z) > 0 reduces net wage rate and reduces labor supply through substitution effects

T(z) > 0 reduces disposable income and increases labor supply through income effects

T(z) < 0 increases disposable income and decreases labor supply through income effects

Transfer program such that T(z) < 0 and T'(z) > 0 always discourages labor supply [see next graph when  $z < z^*$ ]



### Effect of Taxes/Transfers on Labor Supply





### OPTIMAL LINEAR TAX RATE: LAFFER CURVE

 $c = (1 - \tau) \cdot z + R$  with  $\tau$  linear tax rate and R fixed universal transfer funded by taxes  $R = \tau \cdot Z$  with Z average earnings

Individual i = 1, ..., N chooses  $l_i$  to max  $u^i((1 - \tau) \cdot w_i l_i + R, l_i)$ 

Labor supply choices  $l_i$  determine individual earnings  $z_i = w_i l_i \Rightarrow$ Average earnings  $Z = \sum_i z_i / N$  depends (positively) on net-of-tax rate  $1 - \tau$ 

Tax Revenue per person  $R(\tau) = \tau \cdot Z(1-\tau)$  is inversely U-shaped with  $\tau$ :  $R(\tau = 0) = 0$  (no taxes) and  $R(\tau = 1) = 0$  (nobody works): called the Laffer Curve



### OPTIMAL LINEAR TAX RATE: LAFFER CURVE

Top of the Laffer Curve is at  $\tau^*$  maximizing tax revenue:

$$0 = R'(\tau^*) = Z - \tau^* \frac{dZ}{d(1-\tau)} \Rightarrow \frac{\tau^*}{1-\tau^*} \cdot \frac{1-\tau^*}{Z} \frac{dZ}{d(1-\tau)} = 1$$

Revenue maximizing tax rate:  $\tau^* = \frac{1}{1+e}$  with  $e = \frac{1-\tau}{Z} \frac{dZ}{d(1-\tau)}$ 

*e* is the elasticity of average income *Z* with respect to the net-of-tax rate  $1 - \tau$  [empirically estimable]

Inefficient to have  $\tau > \tau^*$  because decreasing  $\tau$  would make taxpayers better off (they pay less taxes) and would increase tax revenue for the government [and hence univ. transfer *R*]

If government is **Rawlsian** (i.e., maximizes welfare of the worst-off person with no earnings) then  $\tau^* = 1/(1+e)$  is optimal to make transfer  $R(\tau)$  as large as possible

### OPTIMAL LINEAR TAX RATE: FORMULA

Government chooses  $\tau$  to maximize **utilitarian** social welfare

$$SWF = \sum_{i} u^{i}((1-\tau)w_{i}l_{i} + \tau \cdot Z(1-\tau), l_{i})$$

taking into account that labor supply  $l_i$  responds to taxation and hence that this affects the tax revenue per person  $\tau \cdot Z(1-\tau)$  that is redistributed back as transfer to everybody

Gov't FOC: (using the envelope theorem as  $I_i$  maximizes  $u^i$ ):

$$0 = \frac{dSWF}{d\tau} = \sum_{i} \frac{\partial u^{i}}{\partial c} \cdot \left[ -z_{i} + Z(.) - \tau \frac{dZ}{d(1-\tau)} \right],$$

### OPTIMAL LINEAR TAX RATE: FORMULA

$$0 = \sum_{i} \frac{\partial u^{i}}{\partial c} \cdot \left[ -z_{i} + Z(.) - \tau \frac{dZ}{d(1-\tau)} \right],$$

$$-\sum_{i}\frac{\partial u^{i}}{\partial c}\cdot z_{i}+\sum_{i}\frac{\partial u^{i}}{\partial c}\cdot Z(.)=\sum_{i}\frac{\partial u^{i}}{\partial c}\tau\frac{dZ}{d(1-\tau)},$$

$$\begin{split} -\sum_{i} \frac{\partial u^{i}}{\partial c} \cdot z_{i} \frac{1-\tau}{Z} \cdot \frac{1}{\sum_{i} \frac{\partial u^{i}}{\partial c}} + \sum_{i} \frac{\partial u^{i}}{\partial c} \cdot Z(.) \frac{1-\tau}{Z} \cdot \frac{1}{\sum_{i} \frac{\partial u^{i}}{\partial c}} = \tau \frac{1-\tau}{Z} \frac{dZ}{d(1-\tau)}, \\ -\bar{g} \cdot (1-\tau) + (1-\tau) = \tau \cdot e, \\ (1-\tau) \cdot (1-\bar{g}) = \tau \cdot e, \\ \frac{1-\tau}{\tau} = \frac{e}{1-\bar{g}} \longrightarrow \frac{1}{\tau} = \frac{e}{1-\bar{g}} + 1 = \frac{1-\bar{g}+e}{1-\bar{g}} \\ \tau = \frac{1-\bar{g}}{1-\bar{g}} + e \end{split}$$

# OPTIMAL LINEAR TAX RATE: FORMULA

Hence, we have the following optimal linear income tax formula

$$\tau = \frac{1 - \bar{g}}{1 - \bar{g} + e} \quad \text{with} \quad \bar{g} = \frac{\sum_{i} z_{i} \cdot \frac{\partial u^{i}}{\partial c}}{Z \cdot \sum_{i} \frac{\partial u^{i}}{\partial c}}$$

 $0 \le \bar{g} < 1$  as  $\frac{\partial u'}{\partial c}$  lower when income  $z_i$  is high (marginal utility falls with consumption)

 $\tau$  decreases with elasticity e [efficiency] and with  $\bar{g}$  [equity]

Formula captures the equity-efficiency trade-off

 $\bar{g}$  is low and  $\tau$  higher and close to Laffer rate  $\tau^*$  = 1/(1 + e) when

- inequality is high
- marginal utility decreases fast with income

 $\bar{g}$  is the average "normalized" social marginal welfare weight weighted by pre-tax incomes  $z_i$ 

 $\bar{g}$  is also the ratio of the average income weighted by individual social welfare weights  $g_i$  to the actual average income Z

Hence,  $\bar{g}$  measures where social welfare weights are concentrated on average over the distribution of earnings. Intuitively, it captures the redistributive taste of the gov't:

- Extreme case 1: gov't doesn't value redistribution at all, then  $g_i \equiv 1$  and hence  $\bar{g} = 1$  and  $\tau = 0$  is optimal
- Extreme case 2: gov't is Rawlsian and maximizes the lump sum demogrant (assuming the worst-off individual has zero earnings), then  $\bar{g} = 0$  and  $\tau^* = 1/(1 + e)$  (the revenue maximizing tax rate)

Taste for redistribution is an element tending to make the tax schedule progressive

### OPTIMAL TOP INCOME TAX RATE (Diamond and Saez JEP'11)

In practice, individual income tax is progressive with brackets with increasing marginal tax rates. What is the optimal top tax rate?

Consider constant MTR au above fixed  $z^*$  Goal: derive optimal au

In the UK,  $\tau = 45\%$  and  $z^* = \pounds 150,000 \ (\simeq \text{top } 1\%)$ 

Denote by z average income of top bracket earners [depends on net-of-tax rate  $1 - \tau$ ], with elasticity  $e = [(1 - \tau)/z] \cdot dz/d(1 - \tau)$ 

Suppose the government wants to maximize tax revenue collected from top bracket taxpayers (marginal utility of consumption of top 1% earners is small)



Source: Diamond and Saez JEP'11



Source: Diamond and Saez JEP'11

### OPTIMAL TOP INCOME TAX RATE

Consider small  $d\tau > 0$  reform above  $z^*$ 

1) Mechanical increase in tax revenue:  $dM = [z - z^*]d\tau$ 

2) Behavioral response reduces tax revenue:

$$dB = \tau dz = -\tau \frac{dz}{d(1-\tau)} d\tau = -\frac{\tau}{1-\tau} \frac{1-\tau}{z} \frac{dz}{d(1-\tau)} \cdot z \cdot d\tau = -\frac{\tau}{1-\tau} \cdot e \cdot z \cdot d\tau$$

Any small reform around the optimum schedule has no first-order effect on welfare. Thus dM + dB must be zero. Optimal  $\tau$  such that:

$$dM + dB = d\tau \left\{ \left[ z - z^* \right] - e \frac{\tau}{1 - \tau} z \right\} = 0$$
  
$$\Rightarrow \quad \frac{\tau}{1 - \tau} = \frac{1}{e} \cdot \frac{z - z^*}{z} \Rightarrow \tau = \frac{1}{1 + a \cdot e} \quad \text{with} \quad a = \frac{z}{z - z^*}$$

### OPTIMAL TOP INCOME TAX RATE

Optimal top tax rate:  $\tau = \frac{1}{1 + a \cdot e}$  with  $a = \frac{z}{z - z^*}$ 

Optimal  $\tau$  decreases with *e* [efficiency]

Optimal  $\tau$  decreases with *a* [thinness of top tail]

Empirically  $a \in (1.5, 3)$ . US has  $a \simeq 1.5$ , UK has  $a \simeq 1.67$ , Denmark has  $a \simeq 3$ . Easy to estimate using distributional data [in the US, mean income above  $z^* =$ \$0.5m is about \$1.5m]

Empirically e is harder to estimate [controversial]

Example: If e = 0.25 then  $\tau = 1/(1 + 1.5 \cdot 0.25) = 1/1.375 = 73\%$ 

### OPTIMAL TOP INCOME TAX RATE Interpretation

(1) The more elastic rich people are (high e), the lower should optimal  $\tau$  be (because of efficiency loss)

(2) Top rate depends negatively on the thinness of the top tail distribution. The higher *a*, the thinner is the tail. Intuitively, if the distrib is thin then  $\uparrow$  top rate for high-income earners will raise little extra tax revenue  $\Rightarrow$  a lower tax rate for the upper bracket is optimal

In fact, in the extreme case where there is only one person in the top bracket (the upper threshold is so high that it only includes the richest person), then z is close to  $z^*$ , so  $a \to \infty$  and  $\tau \to 0$  (no tax for the richest person!)

But this is highly unrealistic as, empirically, there are usually more people in the upper bracket, which gives very stable values for a (e.g., 1.5 in the US, 3 in Denmark)

# REAL VS. TAX AVOIDANCE RESPONSES

Behavioral response to income tax comes not only from **reduced labor supply** but from **tax avoidance** or **tax evasion** 

Tax avoidance: legal means to reduce tax liability (exploiting tax loopholes). E.g., untaxed fringe benefits.

Tax evasion: illegal under-reporting of income

Labor supply vs tax avoidance/evasion distinction matters because:

1) If people work less when tax rates increase, there is not much the government can do about it

2) If people avoid/evade more when tax rates increase, then the govt can reduce tax avoidance/evasion opportunities [close tax loopholes, broaden the tax base, increase tax enforcement, etc.]

## REAL VS. AVOIDANCE RESPONSES

**Key policy question:** Is it possible to eliminate avoidance responses using base broadening, etc.? or would new avoidance schemes keep popping up?

a) Some forms of tax avoidance are due to **poorly designed tax codes** (preferential treatment for some income forms or some deductions)

b) Some forms of tax avoidance/evasion can only be addressed with **international cooperation** (off-shore tax evasion in tax havens)

c) Some forms of tax avoidance/evasion are due to **technological limitations** of tax collection (impossible to tax informal cash businesses)

# EXTENSIONS AND LIMITATIONS

1) Model includes only intensive earnings response. Extensive earnings responses [entrepreneurship decisions, migration decisions]  $\Rightarrow$  Formulas can be modified

2) Model does not include **fiscal externalities**: part of the response to  $d\tau$  comes from **income shifting** which affects other taxes  $\Rightarrow$  Formulas can be modified

3) Model does not include **classical externalities**: (a) charitable contributions, (b) positive spillovers (trickle down) [top earners underpaid], (c) negative spillovers [top earners overpaid]

Classical general equilibrium effects on prices are NOT externalities and do not affect formulas [Diamond-Mirrlees AER '71, Saez JpubE '04]

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