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Aggregate and distributional effects of increasing taxes on top income earners

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Bettina Brüggemann - Jinhyuk Yoo

Aggregate and Distributional Effects of Increasing Taxes on Top Income Earners

SAFE Working Paper No. 113

SAFE | Sustainable Architecture for Finance in Europe

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Non-Technical Summary

With this paper, we want to contribute to the discussion on whether or not the rich should be taxed more heavily than they currently are. The relevant literature comes to different conclusions: While some papers say that the rich should be taxed less than the rest of the population, others find that optimal tax rates for top income earners should be three times as high as current levels.

In our analysis, we look at the impact that doubling the marginal tax rate for the top income bracket would have on the aggregate economy and on the distributions of income and wealth. In order to do that, we build a neoclassical incomplete markets model with heterogeneous agents that differ in their labor ability and therefore in their income. Given their labor ability and current wealth, these households maximize their utility by choosing consumption, savings, and the amount of hours worked. Their income from both capital and labor is subject to a progressive income tax schedule that mimics the actual statutory U.S. income tax schedule. We calibrate the benchmark economy such that it replicates empirical moments from the U.S. economy, while paying a special attention to the distributions of wealth and income as well as the top income share in order to ensure plausibility of our policy experiment.

This policy experiment consists of an increase in the top marginal tax rate, i.e. the marginal income tax rate that pertains to the highest income bracket in the tax schedule, from 35 to 70 percent. The additional tax revenue generated by this tax rate increase will either be redistributed to households in form of lump-sum rebate or by a decrease of the marginal tax rates pertaining to the lower income tax brackets.

We find that such a tax rate increase has negative effects on the aggregate economy: the size of the economy decreases. This is mainly due to the reaction of households in the top income tax bracket that are subject to the tax increase: They hold a large fraction of productive capital, which they reduce heavily in response to the tax increase. This leads to a fall in aggregate production. Nevertheless, at the same time, the tax increase leads to a substantial increase in aggregate welfare. The reasons for this can be found in the reaction of households that are not subject to the top marginal tax rate under the initial tax system: These households increase their consumption on average, caused partly by the favorable impact of the redistribution of the additional tax revenue, partly by general equilibrium effects that play in their favor.

Aggregate and Distributional Effects of Increasing Taxes on Top Income Earners *

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Abstract

We analyze the macroeconomic implications of increasing the top marginal income tax rate using a dynamic general equilibrium framework with heterogeneous agents and a fiscal structure resembling the actual U.S. tax system. The wealth and income distributions generated by our model replicate the empirical ones. In two policy experiments, we increase the statutory top marginal tax rate from 35 to 70 percent and redistribute the additional tax revenue among households, either by decreasing all other marginal tax rates or by paying out a lump-sum transfer to all households. We find that increasing the top marginal tax rate decreases inequality in both wealth and income but also leads to a contraction of the aggregate economy. This is primarily driven by the negative effects that the tax change has on top income earners. The aggregate gain in welfare is sizable in both experiments mainly due to a higher degree of distributional equality.

Keywords: Top Income Taxation, Heterogeneous Agents, Incomplete Markets, Income and Wealth Inequality

JEL Classification: E21, E62, H21, H24

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[•]The views expressed in this paper are those of the authors and should not be attributed to the Bank of Korea.

1 Introduction

In recent years, there have repeatedly been calls for higher taxes at the top of the income distribution. One prominent example is a paper by Diamond and Saez (2011), who find an optimal top marginal tax rate on income of 70 percent or higher. On the public policy side, we have seen the American Taxpayer Relief Act of 2012 which introduced an increase in the top marginal tax rate from 35 to 39.6 percent.

One potential justification for higher taxes at the top comes from the fact that income and wealth inequality increased substantially over the last decade. According to The World Top Incomes Database¹, the U.S. income share of the top 1 percent rose from 7.8 percent in 1971 to 18.3 percent in 2007, while at the same time the highest marginal tax rate on income declined drastically from 70 percent to 35 percent. Reversing the decrease in tax rates, so a somewhat naïve conjecture, could reverse the increasing concentration at the top.

Opponents of higher top income taxation argue that raising taxes could hurt the overall economy. Indeed, it has been a long-standing conjecture in the literature that such a tax reform may induce a conflict between equity and efficiency: It reduces the incentive to work and save among those who are most productive, decreasing overall efficiency in the economy. This decrease in aggregate efficiency would also harm the rest of the population which is not directly subject to the tax increase, despite leading to a more equal distribution of (less) income.

In this paper, we quantitatively analyze the effects of raising taxes on top income earners. We address the conflict between equity and efficiency in a dynamic general equilibrium context where households make optimal decisions on consumption, savings and labor supply. Household behavior generates wealth and income distributions that replicate their empirical counterparts. Although the tax increase will only affect a small fraction of the population at the top of these distributions, this group of the population is more likely to hold a great portion of aggregate capital, to be highly productive or both. If these households change their capital holdings and hours worked after the tax increase, these behavioral responses also lead to macroeconomic consequences such as changes in equilibrium prices. The rest of the population will then react to those price changes by adjusting their savings and labor supply. Over time, this gives rise to changes in the distributions of income and wealth.

We especially look at two specific aspects of the implications of the tax change: First, we analyze the aggregate and distributional effects when the top marginal income tax rate is increased. We pay special attention to the effects that a targeted policy that is only focused on one particular group has on the rest of the population, brought about mainly by general equilibrium price effects and government redistribution. Second, we investigate the impact on aggregate welfare from a utilitarian perspective.

We set up a variant of the Bewley-Aiyagari heterogeneous agent model with both dynastic and life-cycle features. More precisely, we base our model on the seminal work by Castañeda, Díaz-Giménez and Ríos-Rull (CDR (2003) in the following) in which they successfully replicate both the earnings and the wealth distribution especially at their upper tails by including a small number of households with very high endowments of labor efficiency. For our analysis, it is very important to have a good fit at the top end of the distribution in order to make quantitatively meaningful predictions about the effects of changes of the top marginal tax rate. Our main contribution relative

¹<http://topincomes.parisschoolofeconomics.eu>

to CDR (2003) regards the government sector: we enrich the fiscal structure of the model primarily by introducing a step-wise personal income tax function replicating the U.S. tax system in 2007 in order to be able to implement tax changes targeted at top income earners only. We are also very careful about the taxation of capital income: only a fraction of it will be subject to the step-wise personal income tax function, while the rest will be treated at lower rates.

We conduct two policy experiments to analyze the effects of raising top income tax rates. In the first experiment, we increase the statutory top marginal tax rate from the 2007 rate of 35 percent to 70 percent as suggested by Diamond and Saez (2011) and adjust all other statutory tax rates in order to keep the government budget balanced. In the second experiment, we increase the top marginal tax rate by the same amount, but keep the government budget balanced through lump-sum rebates or taxes to all households in the economy.

Our analysis shows that raising the top marginal tax rate results in lower marginal rates by 2 percent for the other income brackets in the first experiment and in positive rebates of \$530 (in 2007 U.S. dollar) to all households in the second experiment. The Gini coefficients for the earnings² and wealth distributions decrease in both experiments, mainly driven by a decrease in wealth and income shares at the top. At the same time, the tax increase has a depressing effect on the aggregate economy: in both experiments, we find a decline in aggregate output, capital, labor, and consumption. We investigate both the direct and indirect effects of the increase of the top marginal tax rate by splitting the measure of households into two groups: those who are subject to the top marginal tax rate under the initial tax system (1.17 percent of population) and those who are not (98.83 percent). Income earners subject to the top marginal tax rate heavily reduce their capital holdings and consumption, but hardly reduce their labor supply. This surprising result is driven by the small number of households among those subject to the highest tax rate that are endowed with the highest level of labor efficiency. For these households, the income effect dominates the substitution effect: They increase their labor supply to counteract reductions in the after-tax wage. This enables the government to raise more tax revenue and redistribute it to the rest of the population.

As a consequence, households that are not directly affected by the higher top marginal tax rate reduce their labor supply only slightly, but increase their capital holdings and consumption in both experiments. The effects differ along the distribution of income, as can be seen when looking at different sub-groups: Low-income workers and retirees increase their earnings and consumption. Middle- and high-income workers see a slight reduction in their pre-tax earnings but still manage to increase their average consumption because of the favorable impact of the experiment on their after-tax income. As a result, the overall effect on welfare (measured by consumption equivalent variation) is substantial: 2.7 percent for the first experiment, 2.8 percent for the second experiment.

Our project is closely related to the macroeconomic literature analyzing fiscal policy in heterogeneous agent models with incomplete capital markets. There is a growing number of papers looking at the taxation of top income earners. Closest to our paper are Badel and Huggett (2014), Guner et al. (2015), Kaymak and Poschke (2015), and Kindermann and Krueger (2014). In concurrent but independent work, Kindermann and Krueger (2014) search for the welfare-maximizing top marginal tax rate in a large-scale overlapping generations model. They find an optimal top marginal tax rate in the order of 90 percent. Like in our analysis, it is welfare-enhancing from a social insurance perspective to heavily tax high labor productivity households because they will

²“Earnings” always refers to income from both labor and capital, unless otherwise specified.

hardly reduce their labor efforts even when confronted with higher tax rates. This crucially depends on the underlying labor productivity process, which Kindermann and Krueger (2014) calibrate to replicate the wealth and earnings distribution, using a similar approach as we do. While they focus on which top marginal tax rate is optimal, we explore how the increase of the top marginal tax rate affects different groups in the population in different ways. We are especially looking at the indirect effects on households whose earnings lie outside of the directly affected highest tax bracket. These effects are brought about by both changes in equilibrium prices and the fiscal instruments that the government uses to balance its budget. In related work, Guner et al. (2015) also analyze the optimal progressive marginal tax rate schedule where they define optimal as revenue-maximizing, not maximizing social welfare. They find that a more progressive tax rate schedule gives rise to a rather small increase in tax revenue of 1.6 percent due to decreases in savings, labor supply and other sources of tax revenues. Badel and Huggett (2014) address a similar research question to ours in a life-cycle model with human capital accumulation, showing that the peak of their model's Laffer curve is reached at a top marginal rate of 52 percent.

As for using the statutory marginal tax rate schedule for calibrating the benchmark model economy, our approach is similar to Heer and Trede (2003), Nishiyama and Smetters (2005) and Altig and Carlstrom (1999). Heer and Trede (2003) and Nishiyama and Smetters (2005) analyze the effects of fundamental tax reforms, while Altig and Carlstrom (1999) examine the changes in the marginal tax rate implemented in the Tax Reform Act of 1986 and quantify the effects on the income distribution. Many studies such as Altig et al. (2001), Nishiyama and Smetters (2005) study fundamental tax reforms, often changing the entire system of taxation.

Díaz-Giménez and Pijoan-Mas (2011) also extend the model of CDR (2003) with additional taxes. However, their focus is on fundamental tax reforms changing the current progressive tax system into systems with flat tax rates. There is a growing number of studies looking at more specific tax reforms like we do: CDR (2003), Cagetti and De Nardi (2009), Domeij and Heathcote (2004), Kitao (2011) and many more. CDR (2003) and Cagetti and De Nardi (2009) investigate the effects of abolishing estate taxes, while Domeij and Heathcote (2004) examine the consequences of changing the mix between labor and capital income taxation. Kitao (2011) analyzes the implications of increased consumption taxes while decreasing income taxes. Other authors, like Conesa and Krueger (2006) or Conesa et al. (2009) take a somewhat different approach and try to determine the optimal degree of progressivity in income taxation.

The remaining paper is organized as follows: We start out by describing the details of the model and defining the equilibrium in Section 2. In Section 3 we then explain how we calibrate the parameters of our model in order to replicate certain empirical targets. The results for the benchmark economy are presented in the first part of Section 4, immediately followed by a description of the experiments and the resulting effects on aggregate variables, the wealth and income distributions, and welfare. Section 5 concludes.

2 The Model Economy

Our model is closely related to the model established in the seminal paper by Castañeda, Díaz-Giménez and Ríos-Rull (2003). It is a dynamic general equilibrium model with heterogeneous agents and incomplete capital markets in the tradition of Aiyagari (1994), and adds a dynastic structure and life-cycle elements. Agents go through spells of employment and retirement before they die and

are replaced by their descendants. We also follow CDR (2003) in calibrating the labor efficiency process to simultaneously match the Lorenz curves of both the U.S. earnings and wealth distribution. Additionally, we incorporate a very rich fiscal structure by introducing a step-wise individual income tax function, payroll taxes, preferential tax treatment of certain types of capital income, and government debt.

2.1 Demographics and Endowments

The economy is populated by a continuum of households of measure one. Households are endowed with a fixed amount of disposable time ℓ . They go through two stages in life: working life and retirement. While working, they experience idiosyncratic shocks to their individual endowment with efficiency labor units and face a constant probability of retiring. When retired, they stop working, start receiving retirement benefits and face a constant probability of dying. When a retiree dies, he is replaced by a working-age descendant who inherits the deceased household's estate and whose earnings abilities are positively correlated with those of his parents.

Age and endowment with efficiency units of labor are captured in a one-dimensional state variable s which takes values in $\mathcal{S} = \{\mathcal{E} \cup \mathcal{R}\}$. When $s \in \mathcal{E}$, the household is of working age and receives a positive endowment with efficiency units of labor, $e(s) > 0$. A working household faces two possible transitions from one period to the next: It can either stay employed and make transitions across different levels of efficiency labor units ($\mathcal{E} \rightarrow \mathcal{E}$), or transit into retirement ($\mathcal{E} \rightarrow \mathcal{R}$). When a household draws $s \in \mathcal{R}$, its endowment with efficiency labor units becomes zero. That is, a retiree is not allowed to earn labor income and instead receives retirement benefits $\omega(s)$. Still, we keep track of the last realization of efficiency labor units during working life in order to be able to model intergenerational earnings correlation. A retired household faces two potential transitions: survival in retirement ($\mathcal{R} \rightarrow \mathcal{R}$), or death and being replaced by a descendant ($\mathcal{R} \rightarrow \mathcal{E}$). The descendant inherits its predecessor's estate after paying estate taxes. Each household's initial endowment with capital is thus determined by this after-tax inherited estate. The joint process for age and efficiency labor units follows a finite-state Markov chain with transition probabilities $\Gamma(s'|s) = \Pr\{s_{t+1} = s' | s_t = s\}$. The corresponding transition matrix can be partitioned into:

$$\Gamma_{\mathcal{S}\mathcal{S}} = \begin{pmatrix} \Gamma_{\mathcal{E}\mathcal{E}} & \Gamma_{\mathcal{E}\mathcal{R}} \\ \Gamma_{\mathcal{R}\mathcal{E}} & \Gamma_{\mathcal{R}\mathcal{R}} \end{pmatrix} \quad (1)$$

Here, $\Gamma_{\mathcal{E}\mathcal{E}}$ describes the transitions between different endowments with labor efficiency units while the household is of working age. The transition into retirement is captured by the partition $\Gamma_{\mathcal{E}\mathcal{R}}$. Households remain in retirement with the transition probabilities gathered in the matrix $\Gamma_{\mathcal{R}\mathcal{R}}$, while they die and working-life descendants take over with probabilities according to $\Gamma_{\mathcal{R}\mathcal{E}}$.

2.2 Preferences and Technology

Every household's time endowment ℓ can be split up into working time and leisure. We assume that the household's instantaneous utility is separable in consumption and leisure³:

$$u(c, \ell - l) = \frac{c^{1-\sigma_1}}{1-\sigma_1} + \chi \frac{(\ell - l)^{1-\sigma_2}}{1-\sigma_2}, \quad (2)$$

³We drop time subscripts for convenience.

with σ_1 as the curvature of consumption, σ_2 as the curvature of leisure, and χ as the utility weight of leisure. With this utility specification the elasticities of labor supply are determined not only by utility parameters but also by hours worked. For example, the Frisch elasticity of labor supply, which is the elasticity of changes in labor supply with respect to changes in wages while keeping the marginal utility of wealth constant, is given by $\frac{\ell-l}{l} \frac{1}{\sigma_2}$. Households working more hours respond less elastically than those working fewer hours.

We assume that households discount future utility at rate β and are perfectly altruistic toward their descendants. Households' preferences are thus given by:

$$E \left\{ \sum_{t=0}^{\infty} \beta^t u(c_t, \ell - l_t) \right\} \quad (3)$$

Aggregate output is produced according to a Cobb-Douglas production function using aggregate effective labor N and aggregate capital K as inputs:

$$Y = F(K, N) = AK^\alpha N^{1-\alpha}, \quad (4)$$

where α denotes the capital share. A is normalized to one, and capital is assumed to depreciate at rate δ . Due to constant returns to scale, the equilibrium profit is zero.

2.3 Capital Market Arrangements

Households cannot insure against idiosyncratic shocks to efficiency labor units by trading explicit insurance contracts, but can self-insure against income uncertainty by saving in one-period risk-free bonds. Bonds can be obtained from either the government or firms. As there is no aggregate risk in the model economy, claims to physical capital and government bonds are perfect substitutes. Households face an exogenous borrowing constraint that prohibits negative wealth. Lastly, we assume competitive factor markets such that factor prices w and r are given by their marginal contribution to output.

2.4 The Government Sector

In order to address our research questions, we introduce a detailed fiscal structure. The government earns revenues either through levying various kinds of taxes or issuing new bonds. These resources are used to finance the transfers to retired households, Ω , wasteful government spending G , and interest payments rD . The government receives taxes from five different sources: consumption taxes, $T_{c,t}$, estate taxes, $T_{E,t}$, payroll taxes, $T_{ss,t}$, capital income taxes, $T_{k,t}$, and ordinary income taxes, $T_{y,t}$. The government budget constraint is thus described by the following equation:

$$G + \Omega + rD = T_c + T_E + T_{ss} + T_k + T_y + (D' - D) \quad (5)$$

Households have to pay consumption taxes that are proportional to their consumption expenditure,

$$\tau_c(c) = \tau_c c, \quad (6)$$

where τ_c is the flat consumption tax rate. Households with levels of wealth above a threshold \underline{z} must pay estate taxes when leaving their wealth to their descendants. We follow CDR (2003) and Cagetti and De Nardi (2009) in the specification of the estate tax function:

$$\tau_E(z) = \begin{cases} 0 & \text{for } z \leq \underline{z} \\ \tau_E(z - \underline{z}) & \text{for } z > \underline{z}. \end{cases} \quad (7)$$

where τ_E is the estate tax rate.

The remaining parts of the tax system rely on four different definitions of income. First, there is labor income defined as $y_l = e(s)lw$. Personal capital income is the interest one receives on savings, $y_k = ra$. Adjusted gross income, $y_{ag}(y_l, y_k)$, is a function of both labor and capital income and will be described in more detail below. The same holds for taxable income y_b , which is a function of adjusted gross income: $y_b(y_{ag})$.

The payroll tax function corresponds to the U.S. social security tax code. Payroll taxes are proportional to labor income y_l but are capped at a certain level of income, \bar{y}_{ss} . The payroll tax function is given by

$$\tau_{ss}(y_l) = \tau_{ss} \min[y_l, \bar{y}_{ss}]. \quad (8)$$

In the current U.S. personal income tax code, the taxation of personal capital income depends on the type of capital one holds. While long-term capital gains and qualified dividends are taxed at preferential rates, short-term capital gains and unqualified dividends are part of the broader ordinary income tax schedule. Capital income stemming from qualified retirement saving accounts is tax-free. In order to capture the different features of capital taxation as accurately as possible without complicating the model too much, we assume that capital income is taxed in three ways: The fraction ψ_1 of capital income is treated preferentially at a proportional rate. The fraction ψ_2 is considered as ordinary income and will be part of taxable income y_b , which is subject to the step-wise federal income tax function.⁴ The remaining fraction of capital income, $(1 - \psi_1 - \psi_2)y_k$ is considered to be tax-free. The tax function for preferential capital income is given by the following equation:

$$\tau_k(y_k) = \tau_k \psi_1 y_k, \quad (9)$$

where τ_k is the proportional tax rate on preferential capital income.

Ordinary income taxes are a function of taxable income. Taxable income, which corresponds to “modified taxable income” in the U.S. personal income tax code, includes the ordinary income fraction of capital income $\psi_2 y_k$, as well as income from labor, y_l . It is defined in the following equation (10):

$$y_b = \underbrace{y_l + \psi_2 y_k - 0.5 \tau_{ss}(y_l)}_{y_{ag}} - d(y_{ag}). \quad (10)$$

⁴ ψ_1 and ψ_2 are endogenous variables that households can choose taking various treatments on capital incomes under the US tax code into consideration. However, we assume a fixed value for ψ_1 and ψ_2 to avoid modeling a more complicated portfolio choice problem.

As this equation shows, taxable income consists of adjusted gross income minus deductions and exemptions. Adjusted gross income is defined as income from the different sources minus the employee's share of payroll taxes already paid. Taxable income is then further reduced by deductions and exemptions, $d(y_{ag})$. These are intended to capture standard and itemized deductions as well as personal exemptions.

The ordinary income taxes paid on taxable income have a linear and a nonlinear component. The nonlinear component is designed to replicate the marginal tax rate schedule of the U.S. federal individual income tax code. More precisely, the income tax consists of M different tax brackets $y_b \in (Y_{m-1}, Y_m]$ with corresponding marginal tax rates $\tau_m, m = 1, 2, \dots, M$. A household with taxable income $y_b \in (Y_{m-1}, Y_m]$ pays the following amount of federal income taxes:

$$F(y_b) = \tau_1(Y_1 - Y_0) + \tau_2(Y_2 - Y_1) + \dots + \tau_m(y_b - Y_{m-1}) \quad (11)$$

There is a well-documented discrepancy between statutory and effective marginal tax rates, because there exist many tax base reductions and loopholes that we cannot take into account. We follow Nishiyama and Smetters (2005) in introducing an adjustment factor ξ capturing this discrepancy and adjusting the marginal tax rates in our schedule. The nonlinear component of the ordinary income taxes is then given by:

$$\tau_{FI}(y_b) = \xi F(y_b) \quad (12)$$

The linear component of the ordinary income taxes is assumed to be proportional to taxable income. This accounts for not only state and local income taxes but also other taxes which are not explicitly considered in the model so as to ensure that the government budget is balanced. Linear and nonlinear components are gathered in the ordinary income tax function as follows:

$$\tau_y(y_b) = \tau_{FI}(y_b) + \tau_y^s y_b \quad (13)$$

2.5 The Household's Decision Problem

The household's state variables are the individual asset holdings, a , and the realization of the idiosyncratic shock to age and endowment with efficiency labor units in the current period, s . The dynamic program is given by:

$$v(a, s) = \max_{c \geq 0, z \geq 0, 0 \leq l \leq \ell} u(c, \ell - l) + \beta \sum_{s' \in \mathcal{S}} \Gamma_{ss'} v[a'(z), s'] \quad (14)$$

$$\begin{aligned} \text{subject to } c + z &= y - T + a \\ y &= e(s)lw + ar + \omega(s) \\ T &= \tau_c(c) + \tau_{ss}(y_l) + \tau_k(y_k) + \tau_y(y_b) \\ a'(z) &= \begin{cases} z - \tau_E(z), & \text{if } s \in \mathcal{R} \text{ and } s \in \mathcal{E}, \\ z, & \text{otherwise.} \end{cases} \end{aligned}$$

where w is the wage per efficiency unit of labor, r is the net rental price of capital, pre-tax labor income y_l is $e(s)lw$, and capital income y_k is ar . As for the sources of income, only working

households can earn labor income and only retired households receive pensions from the government. Every household with positive wealth can earn capital income. The policy functions which solve the above problem are the optimal choices for consumption $c(a, s)$, end-of-period savings $z(a, s)$, and hours worked $l(a, s)$.

2.6 Steady-State Equilibrium

The steady-state equilibrium is defined by the household value function $v(a, s)$, the household policy functions $\{c(a, s), l(a, s), z(a, s)\}$, government policies $\{\tau_{ss}(y_l), \tau_y(y_b), \tau_c(c), \tau_E(z), \tau_k(y_k), \omega(s), G, D\}$, a stationary probability measure of households \mathbf{x} , factor prices (r, w) , and the macroeconomic aggregates $\{K, N, T, \Omega\}$, such that the following conditions hold:

1. Given prices (r, w) and government policy, the household policy solves the households' decision problem.
2. Factor prices are determined competitively: $r = \alpha \left(\frac{N}{K}\right)^{1-\alpha} - \delta$, $w = (1 - \alpha) \left(\frac{K}{N}\right)^\alpha$.
3. The labor and capital markets clear: $N = \int l(a, s)e(s)d\mathbf{x}$, $K + D = \int a'(z(a, s))d\mathbf{x}$
4. The goods market clears: $\int c(a, s)d\mathbf{x} + K' + G = F(K, N) + (1 - \delta)K$
5. The government budget constraint is balanced: $G + \int \omega(s)d\mathbf{x} + r \cdot D = T$
 where, $T = \int \{\tau_{ss}(y_l) + \tau_y(y_b) + \tau_c(c) + \tau_k(y_k)\}d\mathbf{x} + \int_{s \in \mathcal{R}} (\sum_{s' \in \mathcal{E}} \Gamma_{ss'}) \tau_E(z) d\mathbf{x}$
6. The probability measure of households \mathbf{x} is stationary:

$$\mathbf{x} = \int \int \int [\mathbf{I}_{s \notin \mathcal{R} \vee s' \notin \mathcal{E}} \mathbf{I}_{z(a, s)} + \mathbf{I}_{s \in \mathcal{R} \wedge s' \in \mathcal{E}} \mathbf{I}_{(1-\tau_E(z))z(a, s)}] \Gamma_{ss'} d\mathbf{x} dz ds'$$

3 Calibration

We can divide the parameters used in our model into two sets: In the first set, the parameter values are taken from the relevant literature or the US tax code. The other set of parameters is endogenously determined in the model to match features of the US economy of 2007. We especially calibrate the joint age and labor efficiency process to generate the highly skewed distributions for earnings and wealth.

3.1 Utility Function and Technology

We set the coefficient of risk aversion σ_1 to 1.5, the time endowment ℓ to 3.2, and the capital income share α to 0.376 following CDR (2003). Parameters σ_2 and χ are calibrated such that average hours worked for working households are one third of their time endowment and the corresponding Frisch elasticity of labor is one.⁵ The resulting σ_2 and χ are 2.017 and 1.868, respectively.

The discount factor β and the government debt D are calibrated such that the asset to output ratio and the net interest payments of government to output ratio at the stationary equilibrium of

⁵There is some uncertainty about how large the labor elasticity should be: Our choice is in line with existing studies. For example, Conesa et al. (2009) and Kimball and Shapiro (2005) also obtain a Frisch labor elasticity around 1.

Table 1: Parameter values

Parameter	Description	Value
Age and labor efficiency process (following Castañeda et al. (2003))		
$p_{e\rho}$	Probability of retiring	0.022
$p_{\rho\rho}$	Probability of dying	0.066
ϕ_1	Earnings life-cycle controller	0.969
ϕ_2	Intergenerational earnings persistence controller	0.525
Own choices and calibrated parameters		
Preferences		
β	Discount factor	0.946
σ_1	Curvature of consumption	1.500
σ_2	Curvature of leisure	2.017
χ	Relative share of consumption and leisure	1.868
ℓ	Time endowment	3.200
Technology		
α	Capital share	0.376
δ	Depreciation rate	0.056
Government policy		
G	Government expenditure	0.868
ω	Pensions	1.274
D	Government debt	3.162
ξ	Income tax adjustment	0.692
τ_l^s	Linear income taxes	0.119
d	Deductions	$\max\{0.09\bar{y}, 0.0755(y_{ag})\} + 0.07\bar{y}$
\bar{y}_{ss}	Maximum taxable y_l (payroll)	$0.820 \bar{y}$
τ_{ss}	Payroll tax rate	0.153
τ_e	Estate tax rate	0.160
\underline{z}	Tax-exempt level (estate)	$42 \bar{y}$
τ_c	Consumption tax rate	0.05
τ_k	Preferential capital income tax rate	0.150
ψ_1	Share of preferential capital income	0.306
ψ_2	Share of ordinary capital income	0.290

the model economy are targeted at 4.66 and 0.021⁶, respectively. The wealth to output ratio, 4.66, is calculated by dividing \$555,443, which was average household wealth in the United States in 2007, by \$119,223, which the Gross Domestic Product (GDP) per household in 2007.⁷ The resulting β and D is equal to 0.946 and 3.162, yielding a government debt to output ratio D/Y of 0.575 and a capital to output ratio K/Y of 4.086 (which sums up to an asset to output ratio of 4.66). In addition, the depreciation rate δ is determined at 0.056 such that the investment to output ratio I/Y is equal to 22.7 percent.⁸ The parameters are gathered in Table 1.

⁶The net interest payments are defined as interest payments minus interest receipts for combined local, state, and federal governments of the United States. Interest payments (line 29) and interest receipts (line 13) of the federal government are listed in Table 3.2 and those of state and local governments are presented in Table 3.3 of the National Income and Product Accounts (NIPA) 2007 (www.bea.gov).

⁷The population and the average household size of the United States in 2007 were used for computing the GDP per household. They are 301,231,000 and 2.56, respectively. GDP per household was computed by dividing GDP by the number of households. The number of households was obtained by dividing the US population for 2007 of 301,231,100 in table B-34 of the *2011 Economic Report of the President* by an average 2007 SCF household size of 2.41 taken from Díaz-Giménez et al. (2011).

⁸Investment is defined as the sum of gross private fixed domestic investment, change in business inventories and 75 percent of the private consumption in durables. Refer to Table 1.1.5 for Gross Domestic Product in the NIPA 2007.

3.2 Age and Labor Efficiency Process

We calibrate the age and labor efficiency process such that it generates distributions for wealth and earnings that match the distributions that can be observed in the data. When working, the households in the model are assumed to have four different realizations of efficiency labor units. $\Gamma_{\mathcal{E}\mathcal{E}}$ describes the transition probabilities between these four stages and is described in Table 2.

Table 2: Transition Probabilities of Working-Age Households

	s'=1	s'=2	s'=3	s'=4
s=1	94.48	2.90	0.41	0.006
s=2	3.50	93.93	0.37	0.001
s=3	1.80	0.43	95.55	0.020
s=4	6.50	0.60	6.80	83.90

As this table only describes one partition of the transition matrix, its rows do not yet sum up to one. The remaining 2.2 percent are the diagonal elements of the partition $\Gamma_{\mathcal{E}\mathcal{R}}$ and represent the probability of retirement that each working household faces. This probability implies an average working life of 45 years. $\Gamma_{\mathcal{R}\mathcal{R}}$ is also a diagonal matrix, but with the probability of surviving as its diagonal elements. The probability of dying is 6.6 percent and leads to an average duration of retirement of 18 years. The calibration of the remaining partition of the transition probability matrix, $\Gamma_{\mathcal{R}\mathcal{E}}$, is somewhat more involved and captures the transition from retirement to employment, that is, dying and being replaced by a working-age descendant. It is also quantifying the intergenerational persistence of earnings ability as well as rising profiles in earnings over the life-cycle, both of which are controlled by two parameters, ϕ_1 and ϕ_2 . We set $\phi_1 = 0.969$ and $\phi_2 = 0.525$, so that the resulting cross-sectional correlation between average life-time earnings of one generation of households and that of the subsequent generation is 0.22 and the ratio of average earnings of senior workers to those of new junior workers to be equal to 1.23.⁹

The calibration procedure implies the following endowments with efficiency labor units and stationary distribution of working age households (Table 3):

Table 3: Relative endowments with efficiency labor units

	s=1	s=2	s=3	s=4
e(s)	1.00	3.15	9.78	920.00
$\gamma_{\mathcal{E}}^*$ (%)	47.6	37.4	15.0	0.045

As can be seen in this table, there is an especially large jump in labor efficiency from the third to fourth state. Together with the low probability of ever reaching the highest efficiency state, and the relatively high probability of falling all the way to the lowest state after having reached the

⁹We take these values from CDR (2003), who target a cross-sectional correlation between average life-time earnings of one generation of households and that of the subsequent generation of 0.4 to account for the intergenerational persistence of earnings ability. They also target the ratio of average earnings of senior workers to those of new junior workers to be equal to 1.303. Due to the difficulties in simultaneous matching of two targets, they ended up with an intergenerational correlation of 0.25 and an earnings ratio of 1.09. The two parameters ϕ_1 and ϕ_2 are calibrated to hit the compromise targets. The interested reader may be referred to the more detailed description in the paper by CDR (2003).

highest state (cf. Table 2), this ensures the long tails of the wealth and income distribution and especially the high fraction of income or wealth held by the top 1 percent.

3.3 Government Policy Parameters

The government policy in the model economy consists of (wasteful) public spending, transfers to retirees, and various taxes. We try to replicate the government policy of 2007. We target a government spending to output ratio G/Y of 15.8 percent, which was the GDP share of government consumption expenditure in 2007. The resulting parameter G is 0.868. Then, we calibrate the level of pensions ω to 1.274 income units, targeting an aggregate transfers to output ratio Ω/Y of 5.8 percent, which corresponds to the sum of Medicare and two thirds of Social Security transfers to GDP.

One of the features of our model economy is the detailed tax structure. First, we determine the parameters describing payroll taxes, τ_{ss} and \bar{y}_{ss} following the provisions in the U.S. Social Security Act. In 2007, the payroll tax rate paid by both households and firms was 7.65 percent, respectively, and the maximum taxable labor earnings were \$97,500.¹⁰ Average output in our economy \bar{y} corresponds to GDP per household in 2007, which was \$119,223. Maximum taxable labor earnings are approximately 82 percent of the GDP per household. We set $\tau_{ss} = 0.153$ and $\bar{y}_{ss} = 0.82\bar{y}$, where \bar{y} represents output per household in the model economy.

Next, we choose the parameters describing capital income taxes: τ_k , ψ_1 and ψ_2 . As explained in the model section, the fraction ψ_1 of capital income is taxed at a preferential rate, whereas the fraction ψ_2 is included in ordinary income subject to progressive tax rates according to income level. We set ψ_1 and ψ_2 to 0.306 and 0.290, respectively. We obtain these values from the Tax Policy Center (Harris, 2010). They classify capital income into five categories by tax treatment, where numbers in the parentheses indicate the shares of each type of capital income in total capital income: tax-preferred capital income such as long-term capital gains and qualified dividends (30.6 percent), returns to defined-contribution retirement saving accounts (36.0 percent), tax-exempt interest income (4.4 percent), fully-taxable capital income (23.8 percent), and capital income derived from business pass-through income (5.2 percent). ψ_1 corresponds to the share of long-term capital gains and qualified dividends in total capital income whereas ψ_2 relates to the share of fully taxable capital income and business income. In addition, we set the preferential capital income tax rate τ_k to 0.15 since long-term capital gains and qualified dividends are usually taxed at 15 percent in 2007.

Third, we choose the parameters of ordinary income taxes: deductions $d(y_{ag})$, the schedule of federal income tax brackets and marginal tax rates, the adjustment factor ξ , and linear income taxes τ_I^s . In determining the function for deductions and exemptions, we consider the fact that every taxpayers can reduce the tax liability by using either the standard deduction or by itemizing their deductions. The standard deduction for married couples filing jointly in 2007 was \$10,700, which translates to around 9 percent of GDP per household. The itemized deduction is assumed to increase linearly in the adjusted gross income as in Nishiyama and Smetters (2005) and the coefficient for the slope is also taken from their paper. On top of that, we consider a personal exemption which was \$3,400 per person in 2007. Multiplied by the average household size of 2.56 persons, the personal exemption is set to roughly 7 percent of GDP per household. The resulting

¹⁰Data was obtained from the U.S. Tax Policy Center (<http://www.taxpolicycenter.org/index.cfm>).

function is defined as follows: $d(y_{ag}) = \max\{0.09\bar{y}, 0.0755(y_{ag})\} + 0.07\bar{y}$.

As for the nonlinear ordinary tax function $F(y_b)$ we employ the statutory marginal tax-rate schedules for married couples filing jointly in 2007 as given in Table B.1 in the appendix. Every threshold used for the tax brackets is normalized using GDP per household. Although we allow for some deductions and exemptions in the tax code, we cannot fully take into account all reductions of the tax base so that the resulting level of taxable income in our model would be too high. We therefore calibrate ξ such that the ratio of federal individual income tax revenue together with taxes on preferential capital income to output $(T_{FI} + T_k)/Y$ is 8.39 percent (cf. Table B.2). The resulting ξ is 0.692, implying an effective top marginal federal income tax rate of about 24.2 percent ($35\% \times 0.692$) which is in line with the estimates for married households by Guner et al. (2014).

We choose the linear income tax rate, τ_I^s such that the government balances its budget at the stationary equilibrium of the model economy. The resulting flat income tax rate τ_I^s is 11.9%.

Fourth, we characterize the estate tax function, that is, choose the values for τ_E and \underline{z} . We set the tax-exempt level to $\underline{z} = 42\bar{y}$, which corresponds to the statutory tax-exempt level of \$5 million, and the estate tax rate τ_E to 16% (Cagetti and De Nardi, 2009). Lastly, we set the rate for consumption taxes τ_c to 5% following Conesa et al. (2009).

4 Results

4.1 Characteristics of the Benchmark Equilibrium

After having calibrated and solved the benchmark model we now give a short summary of the model fit. In Table 4 we first look at some of the relevant macroeconomic ratios. We hit our calibration targets perfectly. The consumption to output ratio as well as several of the ratios for different types of tax revenues relative to output were not targeted, but nevertheless match their empirical counterparts well.

Table 4: Macroeconomic and Fiscal Policy Ratios in the U.S. and in our Benchmark Economy

	Targeted				Not targeted			
	$\frac{I}{Y}$	$\frac{K+D}{Y}$	$\frac{G}{Y}$	$\frac{T_{FI}+T_K}{Y}$	$\frac{C}{Y}$	$\frac{T_{SS}}{Y}$	$\frac{T_C}{Y}$	$\frac{T_E}{Y}$
Data	0.227	4.660	0.158	0.084	0.609	0.063	0.037	0.002
Model	0.227	4.662	0.158	0.084	0.613	0.060	0.031	0.002

Note: T_C is the sum of sales and excise taxes from Table B.2 in the Appendix.

As described in the calibration section, we calibrate the process for efficiency units of labor targeting a number of moments from the distributions of both earnings and wealth. Table 5 presents the distributions of earnings and wealth that we arrive at in our benchmark setup and compares them to the empirical distributions based on SCF data from 2007 as presented in Díaz-Giménez et al. (2011). The table shows that the distributions of wealth and earnings in our benchmark economy are close to the targeted empirical distributions. The overall degree of inequality measured by the Gini coefficient is a little smaller than in the data, but we replicate the shape of the distributions well. Since we want to look at the repercussions of higher taxes on top income earners, it is especially important that we hit the upper tail of the distributions well. The fraction of income and wealth owned by the richest 20 percent is underestimated by only up to 5 percentage points which is mostly

Table 5: The Distributions of Earnings and Wealth

	Gini	Quintiles					Top (%)		
		1st	2nd	3rd	4th	5th	90-95	95-99	99-100
Distribution of Earnings									
Data	0.636	-0.1	4.2	11.7	20.8	63.5	11.7	16.6	18.7
Model	0.599	0.6	6.6	9.1	23.7	60.0	14.9	15.8	14.9
Distribution of Wealth									
Data	0.815	-0.2	1.1	4.5	11.2	83.4	11.1	26.7	33.6
Model	0.779	0.0	0.4	6.0	15.3	78.3	15.5	17.1	31.8

driven by an underestimation of the top percentile. Nevertheless, the top 1 percent income earners, who will be at the heart of our policy analysis, are reasonably well represented to be able to make meaningful predictions about their behavior and its repercussions for the aggregate economy. We are even more successful in replicating the top end of the wealth distribution, where we deviate from the data by only 1.8 percentage points.

In Table 6 we look more closely at the group of top income earners. The fraction of the population whose income is high enough to belong to the highest tax bracket and is subject to the highest marginal tax rate amounts to 1.17 percent in the benchmark model. This figure is a little higher than its empirical counterpart (0.74 percent), which is calculated as the share of tax returns falling into the highest tax bracket in 2007. We are successful in replicating characteristics of their tax situation, like the average federal income tax they pay. In addition, our benchmark model delivers a decomposition of average earnings into labor and capital income in line with the range in the data. As none of the statistics in this table were targeted, we believe that the top 1 percent are well represented in our model.

Table 6: Some statistics on top income earners

	Data	Benchmark
Total fraction of households subject to TMTR	0.74	1.17
Average federal income tax rate (Top 1%)	22.4	22.0
Labor income share (Top 1%)	68.1-75.0	73.0
Capital income share	31.9-25.0	27.0

Note: The fraction of households subject to the top MTR is the probability measure of those households in stationary distribution. The corresponding data is calculated as the number of returns subject to the highest marginal tax rate divided by the total number of returns. The average federal income tax rate is calculated by dividing total federal personal taxes of the top 1% by their taxable income. The data for the average federal income tax rate is taken from Diamond and Saez (2011). In the benchmark labor (capital) income share is defined as the share of labor (capital) income in earnings. The empirical counterpart depends on the treatment of entrepreneurial income. We define labor income as the sum of wages plus a certain fraction of entrepreneurial income, where the fraction ranges from 0 to 0.5. (Source: Table "Returns with Modified Taxable Income: Taxable Income and Tax Classified by Each Rate at Which Tax Was Computed and by Marital Status" in Internal Revenue Service (2009), World Top Incomes Database (<http://topincomes.g-mond-parisschoolofeconomics.eu>))

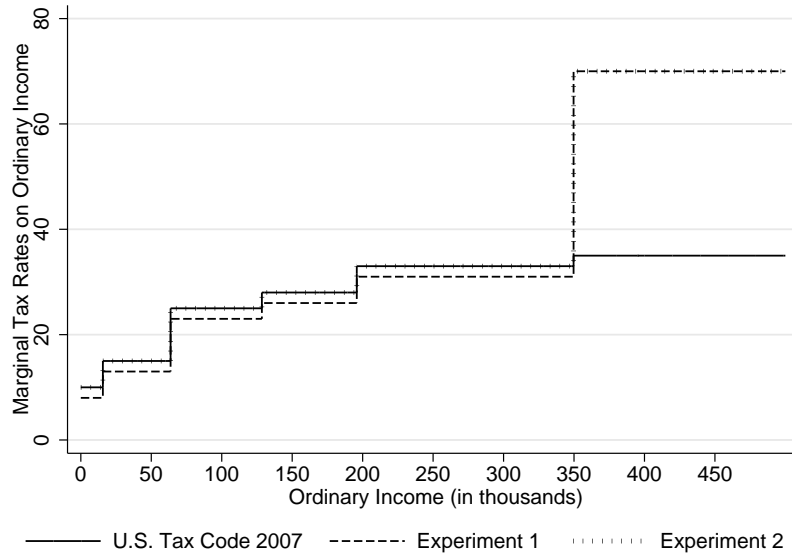


Figure 1: Federal Income Tax Function with 2 Policy Experiments

4.2 Policy Experiments

4.2.1 Experimental Setup

We conduct two policy experiments. Our economy starts out from the benchmark steady state based on the 2007 U.S. tax system. The government unexpectedly decides to implement a tax reform where it increases the top marginal tax rate (TMTR) from its current statutory level of 35 percent to 70 percent, a level that has been in place in the U.S. during the 1970's. Taking into account the income tax adjustment factor $\xi = 0.692$, the effective TMTR increases by 24.2 percentage points ($24.2\% \rightarrow 48.4\%$). Throughout both exercises, we keep government spending on consumption and pensions as well as government debt constant.

The two experiments differ in the policy tools that the government uses to keep its budget balanced. In the first experiment, the MTRs pertaining to all income brackets except the highest one are adjusted. If it were not for behavioral responses and general equilibrium effects, all other effective MTRs could be lowered by 2.75 percentage points. We arrive at this value as follows: The total federal personal income tax raised only from households in the highest income bracket with the statutory TMTR of 35 percent is 0.069. Doubling this tax rate would increase tax revenues by the same amount if everything else stayed the same. The aggregate tax base below the highest income threshold, $\max(Y_b, Y_M)$ is 2.496. Absent any behavioral responses or price effects, the government could therefore reduce all other effective MTRs by 2.75 percentage points ($-0.069/2.496 \times 100$) without giving up any tax revenue in comparison to the benchmark economy. A reduction of the effective MTRs by 2.75 percentage points is equivalent to a reduction of statutory MTRs by 4.0 percentage points ($2.75/\xi$). In the second experiment, lump-sum transfers to (or taxes from) every household are used to keep the government's budget balanced. Without taking into account behavioral responses and general equilibrium effects, the units paid out to every household in the model economy would amount to 0.069. This (annual) universal transfer corresponds to \$1,490 in 2007 U.S. dollars. Figure 1 shows the function summarizing the statutory tax code and visualizes the two experiments.

Table 7: Effect on Aggregate Variables

	Y	K	N	L	C	T_{FI}	r (%)	w
Benchmark	5.49	22.45	2.35	0.80	3.37	0.42	3.64	1.46
Experiment I	-1.7%	-2.8%	-0.8%	-1.5%	-1.5%	5.4%	3.79	1.44
Experiment II	-2.4%	-3.7%	-1.3%	-2.3%	-2.2%	12.8%	3.82	1.44

It does not have to be the case that the government is able to lower the MTRs pertaining to the lower tax brackets or to pay out a positive rebate. If the higher top marginal tax rate distorts household behavior to such a degree that total tax revenue is reduced, the government would in fact have to raise all other MTRs (Experiment I) or levy lump-sum taxes (Experiment II) in order to be able to sustain total government expenditure. This is not the case in our version of the model. Households respond in a way that still enables the government to use the additional resources to reduce taxation on all other households. In experiment I, all statutory MTRs except the highest one can be decreased by 2.03 percentage points and in experiment II, the government pays out a positive transfer of 0.024 (corresponding to \$531 or 0.7 percent of average consumption in the benchmark economy) to households. The rate reductions and transfers are notably lower than what they would have been absent any behavioral responses or general equilibrium effects.

4.2.2 Effects on Macroeconomic Aggregates

In this section, we first show how the higher TMTR causes a contraction of the aggregate economy, but nevertheless leads to an increase in aggregate tax revenue. In the sections after this, we will then explore how these aggregate effects are brought about by the economic reactions of households at different levels of (taxable) income. In that latter part of the analysis, our focus does not only lie on the effects on those households who are directly affected by the tax increase because they are subject to the highest MTR, but also on indirect effects on households that account for the remaining part of the income distribution.

Table 7 shows that both policy experiments have a depressing impact on the aggregate economy. Output Y decreases, caused by reductions in both the aggregate capital stock K and aggregate effective labor N , and so does consumption C . Capital decreases more than labor does, so that the lower capital-labor ratio leads to lower wages w and higher interest rates r . We will discuss the mechanisms leading to these aggregate effects more thoroughly in the subsequent sections. In the new steady state, a large fraction of households has dropped out of the highest tax bracket, which only contains 0.6% of households after the first experiment and 0.4% after the second. Nevertheless, tax revenues from federal income taxes, T_{FI} , go up, and the increase feeds through to total tax revenues. But this increase in total tax revenue from all types of taxes is dampened due to reduced revenues from e.g. consumption taxes.

All of these effects are more extreme in the second experiment, where the government balances the budget via lump-sum transfers to all households. The reasons for this can be summarized as follows: Decreasing all other MTRs except the top one, as we do in Experiment I, increases incentives for households subject to these lower tax rates to accumulate more assets and to work more because after-tax returns to labor increase, keeping everything else constant. In Experiment II, incentives to work are reduced since the universal transfers to households increase their disposable

Table 8: Effects on Group Averages: Households subject to TMTR (Top 1.17%) versus the Rest

	a	ϵl	l	c	$y_l + y_k$	$\%y_l$	$\%y_k$	$\%$ in Pop
Top 1.17% (subject to TMTR in benchmark economy)								
Benchmark	16.33	11.67	1.49	7.58	12.56	73.0	27.0	1.17
Experiment I	-41.6%	4.0%	-1.7%	-31.7%	-8.6%	9.4% $_p$	-9.4% $_p$	-45.0%
Rest of the population								
Benchmark	0.82	0.87	0.99	0.92	0.86	79.6	20.4	98.83
Experiment I	6.4%	-1.5%	-1.5%	1.4%	0.2%	-2.1% $_p$	2.1% $_p$	0.5%

The level of each variable is expressed relative to its population mean.

income and thereby induce them to work less due to the income effect. Leisure provides positive utility, so it might be optimal for many households to reduce their working hours while keeping the level of disposable income and consumption constant.

The reaction of a household to a higher TMTR depends on its endowment with income and wealth and the risk of losing both that he is confronted with. Following a tax change, changes in the policy functions of households at the top of the distribution will be very different from the bottom of the distribution. We are therefore now going to take a closer look at different subgroups of the distribution of taxable income and analyze their reaction when confronted with a higher marginal tax rate at the top. For this, we are only going to look at the first experiment. As for the aggregate macroeconomic effects, the results for the second experiments are slightly more negative, but not qualitatively different. They can be found in Appendix B.2.

4.2.3 Effects on Households subject to the TMTR

In this section, we will look at the effects that a tax change has on households that are subject to the TMTR in the benchmark economy. While these very rich households will drastically reduce their asset holdings and consumption, their reduction in hours worked is small.

In the first row of each panel in Table 8 we present the group averages for savings a , (effective) labor supply $(\epsilon)l$, consumption c , earnings and their decomposition into labor and capital income (y_l and y_k , respectively) relative to the overall mean in the benchmark economy. In the second row we show the percentage (point) change for each variable in the first experiment. Looking at the equilibrium outcomes in the benchmark economy, the top 1.17 percent households own 20 times more wealth and earn 14 times as much as the rest of the population. These households also supply on average more labor than the rest, but this is also due to the fact that hardly any non-working retirees can be found in this group, while they account for a large fraction in the rest of the population (25 percent overall). The difference in the effective labor supply is even larger, due to the fact that mainly households with a high endowment of efficiency labor units are represented in this group. Also, the top 1.17 percent income earners rely on capital income to a greater degree than the remaining population: Average earnings consist of 73 percent labor income and 27 percent capital income, while the ratio for the rest of the population is 80 to 20 percent.

As expected, the top 1.17 percent on average drastically decrease their asset holdings when facing a higher TMTR. The increase in the TMTR significantly reduces their incentive to save,

Table 9: Decomposition of Labor Supply Reaction of Households subject to the TMTR

	$s = 3$	$s = 4$	Rest
Share of Households	88.9%	2.5%	8.9%
Benchmark Labor Supply	1.32	0.71	0.0
Experiment I	-5.4%	+8.0%	-

such that they reduce their average capital holdings by more than 41 percent. Their earnings fall by 8.6 percent. By this many households successfully avoid the highest tax bracket: The fraction of households who are still subject to the new TMTR in Experiment I is reduced by 45 percent.

The large decrease in consumption and asset holdings is worth discussing more thoroughly. The intuition behind these results starts with the after-tax wage, which decreases for the top earners. The relative price of leisure decreases. As the level of consumption is very high for these people, their marginal utility of consumption is low, especially relative to leisure. They will therefore reduce consumption heavily in response to lower after-tax wages at a relatively low utility cost. Since the new optimal level of consumption is lower, the amount of savings desired to insure against reductions in income goes down as well. In combination with the increased tax rate on capital returns, this constitutes a large disincentive to saving and leads to the sharp decline in asset holdings. The policy measure we use in the experiments to ensure a balanced government budget reinforces this decline in household wealth: The new tax and transfer system provides some additional insurance through steeper tax progressivity, reducing the need to accumulate savings due to precautionary motives.

Interestingly, households at the top end of the distribution on average hardly reduce their hours worked, and labor supply even increases when looking at efficiency units, ϵl . This effect can be puzzling at first, since intuition tells us that a higher tax rate should provide a large disincentive to working for households subject to the higher TMTR. Therefore, we decompose this group into the different levels of efficiency labor units in order to get a deeper insight into the labor supply reaction and present the results in Table 9.

The two most important groups within those subject to the highest MTR are workers that are endowed with the two highest levels of efficiency labor units. These two groups behave differently after the tax reforms: While households with $s = 3$ reduce their labor supply as we would have expected, the most efficient households ($s = 4$) increase it. The mechanism behind this result can be explained as follows: Due to their large endowment with efficiency labor units, the highest earning households will always face the highest tax rate when working. The only way to avoid the highest tax bracket is to not work at all. At the same time, the highest efficiency stage is very transitory and households endowed with this level of labor efficiency will most likely receive a low income shock after a small number of periods. Their incentive to work, earn a lot of income and accumulate savings (due to a precautionary savings motive as well as the prospect of not having to work anymore in the future) is therefore very high and will remain high even they face a higher marginal tax rate they. The income effect at this level of consumption and earnings is larger than the substitution effect, such that these households will increase their labor supply after the tax reform.

In the Appendix C, we show the labor supply reaction for different levels of wealth for working households with different endowments of labor efficiency. There, one can see that households at the

second-highest efficiency level ($s = 3$) and with relatively low wealth will reduce their hours worked up to a certain wealth threshold to avoid paying the highest tax rate, while richer households do not change their labor supply. The graph for the highest-efficiency households ($s = 4$, all subject to the TMTR) shows that these households increase their labor supply only at relatively low levels of wealth. If their wealth exceeds a certain threshold, they will start reducing their labor supply as well. Lower-efficiency households subject to the highest TMTR are all non-working, either because they are retired or consuming out of their wealth and capital income.

4.2.4 Effects on Other Households

In this section, we look at reactions by the rest of the population which is not subject to the TMTR in the benchmark economy. On average, these households react very differently than the top income ones: They increase their asset holdings and consumption while reducing their labor supply.

In Experiment I, the rest of the population is confronted with lower marginal and average tax rates as well as higher equilibrium interest rates. As a consequence, they increase their average capital holdings by 6.4 percent as we can see in Table 8. Although their average labor supply slightly declines in response to the lower wage, average earnings even increase by 0.2 percent, leading to an increase in consumption of 1.4 percent. Due to the higher interest rate and more accumulated wealth, the share of capital income in total earnings of the remaining 98.83 percent goes up. Compared to the top 1.17 percent, these households react in much the opposite way by shifting toward more capital instead of shifting away from it. This helps them to reduce their tax burden even more, because payroll taxes rely on labor income only and capital income is partly tax-free.

The rest of the population is in itself very heterogeneous in terms of wealth and income. We therefore divide this group into four sub-groups as shown in Table 10. First, we divide workers into three groups by their level of taxable income: High-income workers (the highest-earning 20 percent of working households, always excluding the top 1.17 percent of the overall distribution), then middle-income workers (the 50 percent of households in the middle of the distribution), and low-income workers (the lowest-earning 30 percent). The fourth group consists of all retirees (again excluding those retirees subject to the highest tax rate).

The three groups of workers show very different behaviors in the benchmark economy. Average asset holdings and (effective) labor supply of low-income households are three times lower than for middle-income households. The earnings share of labor income is highest among middle-income households, which implies that this group mainly consists of higher efficiency workers with relatively high labor income but with little wealth and interest income. High-income households supply comparable levels of hours worked, but also dispose of levels of wealth that are more than twice as high as those of the middle-income households. Average consumption is increasing with income. Retirees have on average twice as much wealth as low-income households, but also have to rely entirely on their interest income to stock up their retirement benefits. Their average level of consumption is between that of lower- and middle-income households.

How do the reactions to the tax reform differ across earnings levels? Especially low- and middle-income households increase their average asset holdings drastically, while reducing their average labor supply. This leads to an increase in average earnings of low-income households mainly due to the increase in capital income because of the higher interest rate. Lower-income households and retirees are the biggest beneficiaries in terms of consumption, which increases by 2 percent an

Table 10: Effect on Group Averages: Households not subject to TMTR

	a	ϵl	l	c	$y_l + y_k$	$\%y_l$	$\%y_k$
Upper 20% (80-100%)							
Benchmark	2.35	2.73	1.40	1.95	2.64	81.4	18.6
Experiment I	1.4%	-0.7%	-0.2%	0.3%	-0.4%	-1.1%	1.1%
Middle 50% (30-80%)							
Benchmark	0.95	1.46	1.38	1.14	1.35	85.0	15.0
Experiment I	9.7%	-2.1%	-2.7%	1.4%	-0.4%	-2.2%	2.2%
Lower 30% (0-30%)							
Benchmark	0.33	0.43	1.28	0.58	0.42	81.9	18.1
Experiment I	15.6%	-1.3%	-1.3%	2.0%	1.6%	-3.1%	3.1%
Retirees							
Benchmark	0.57	0.00	0.00	0.68	0.13	0.0	100.0
Experiment I	6.7%			3.4%	10.8%		

The level of each variable is expressed relative to its population mean.

3.6 percent for these two groups, respectively, and is for both financed by the increase in capital income and the reduction of the tax burden. For higher-income households consequences of the tax changes are small, implying that negative indirect effects of increasing the TMTR on higher-income households that are not subject to the TMTR are negligible.

Overall, increases in capital holdings and consumption by the rest of the population counteract the aggregate losses caused by the top 1.17 percent of households. All subgroups along the income distribution increase their capital holdings and consumption, even though they differ substantially in wealth and income. The biggest contribution to the increase in consumption by the rest of the population that we saw in Table 8 comes from low-income households and retirees, where retirees especially profit from the increase in the after-tax return to capital.

4.2.5 Distributional Effects

Now, we want to look at how the changes in average outcomes for the different groups are reflected in the overall distribution of wealth, earnings and income after taxes and transfers. The deterioration of macroeconomic efficiency that we saw above is counteracted by higher distributional equity, as the standard equity-efficiency tradeoff suggests and Table 11 confirms. The table depicts the distributions of earnings, income after taxes and transfers, and wealth resulting from the benchmark economy as well as the final steady state distribution. Both experiments have redistributive effects, as can be seen in the decreasing Gini coefficients characterizing three distributions (for Experiment II, see Appendix B.2).

The redistributive effect on the distributions of wealth and income after taxes and transfers is very similar. Its Gini coefficient of income after taxes and transfers decreases by 4 percent. But also

Table 11: The Effect on the Distributions of Earnings and Wealth

	Gini	Quintiles					Top (%)		
		1st	2nd	3rd	4th	5th	90-95	95-99	99-100
		Distribution of Earnings							
Benchmark	0.599	0.6	6.6	9.1	23.7	60.0	14.9	15.8	14.9
Experiment I	0.589	0.7	6.9	9.0	24.0	59.3	15.1	15.8	13.8
		Distribution of Income after Taxes and Transfers							
Benchmark	0.537	5.3	6.9	7.3	22.5	58.0	14.5	15.3	14.8
Experiment I	0.510	5.8	7.3	7.9	23.4	55.6	14.7	15.5	11.7
		Distribution of Wealth							
Benchmark	0.779	0.0	0.4	6.0	15.3	78.3	15.5	17.1	31.8
Experiment I	0.742	0.0	0.9	7.2	16.3	75.6	16.9	18.2	24.1

for the wealth distribution, it decreases by 4.7 percent. As the average outcomes for households subject to the TMTR suggest, the wealth share owned by the top 1 percent goes down by 7.7 percentage points¹¹. This decrease is partly compensated by increases in the wealth shares held by the remaining households in the top decile. The other part of the distribution also gets thicker, most notably in the middle quintiles. The equalizing impact of raising the top marginal tax rate is significant. Effects on the distribution of income after taxes and transfers are strongest at the top end of the distribution as well, as the nature of the tax reform lets us expect: The share of disposable income of the top 1 percent decreases by 2.9 percentage points in the first experiment. This is mainly compensated by an increase in the income share of households in the fourth quintile. The degree of redistribution in pre-tax earnings is smaller than for the other two distributions. While a large part of the redistribution of income after taxes and transfers is a direct consequence of the change in the tax system, indirect effects via prices and behavioral responses are mainly responsible for the narrowing of the earnings distribution.

Summarizing the analysis, increasing the TMTR brings out a more equal but less productive economy, confirming a trade-off between equality and *aggregate* efficiency. Interestingly and contrary to popular belief, the loss in efficiency is not due to a reduction in work effort by the most productive, but due to a reduction in their equilibrium consumption and savings. Moreover, the effect on average group outcomes is quite heterogeneous. At some levels of income, households even manage to increase their consumption thanks to higher interest rates and lower marginal tax rates on their income. There is therefore room for an increase in total welfare of the economy, which we will analyze in the next section.

4.2.6 Welfare

In this section, we will describe how the tax reform leads to an increase in aggregate welfare mainly because of the large degree of redistribution. In order to figure out how the aggregate welfare

¹¹Note that these are relative measures, it need not reflect the absolute amounts of wealth held by the richest 1 percent but could also be a composition effect

Table 12: The Decomposition of Aggregate Welfare Changes

Description	Experiment I
Aggregate consumption equivalent variations (CEV, λ)	2.7%
Decomposition: Contributions to λ by Changes in:	
Taxes and transfers	+27.5%
Equilibrium prices	-6.3%
Equilibrium distributions	+78.7%
Each contribution to λ is computed by dividing the CEV from changes in each factor by the aggregate CEV. Adding up three contributions makes one hundred percent.	

changes after each tax reform, we calculate the consumption equivalent variation (CEV, λ) based on a utilitarian welfare function. The CEV λ describes the percentage by which consumption has to be changed for every household in the benchmark economy in order to achieve the same level of aggregate welfare as in the experiment economy. Formally, this is written as:

$$\int v_{BM}(a, s, \lambda; r_{BM}, w_{BM}, \tau_{BM}) \mathbf{d}\mathbf{x}_{BM} = \int v_{Ex}(a, s; r_{Ex}, w_{Ex}, \tau_{Ex}, b) \mathbf{d}\mathbf{x}_{Ex}. \quad (15)$$

Here, the value function $v_{Ex}(a, s)$ is the solution to the household's decision problem as given by equation (14) with new equilibrium prices and a new tax and transfer system, and \mathbf{x}_{Ex} is the probability measure of the experiment economy. The right-hand side shows the aggregate welfare of the experiment economy.¹² The value function $v_{BM}(a, s, \lambda)$ is the welfare of a household of type (a, s) which can be achieved by adjusting only equilibrium consumption by a factor of $1 + \lambda$:

$$v_{BM}(a, s, \lambda; r_{BM}, w_{BM}, \tau_{BM}) = u(c_{BM}(a, s)(1 + \lambda), \ell - l_{BM}(a, s)) + \beta \sum_{s' \in \mathcal{S}} \Gamma_{ss'} v[a'(z_{BM}(a, s)), s'], \quad (16)$$

where $c_{BM}(a, s)$, $l_{BM}(a, s)$ and $z_{BM}(a, s)$ are solutions to the household's decision problem for the benchmark economy. The aggregate CEVs in the two experiments are of similar magnitude: 2.7 percent for experiment I, 2.8 percent for experiment II.

We can decompose the aggregate welfare change into three elements by constructing two hypothetical economies.¹³ First, we build a hypothetical economy characterized by the benchmark equilibrium prices and distributions, but where the new tax and transfer system is already in place. We can then compute the CEV λ^A for this economy:

$$\int v_{BM}(a, s, \lambda^A; r_{BM}, w_{BM}, \tau_{BM}) \mathbf{x}_{BM} = \int v_{EA}(a, s; r_{BM}, w_{BM}, \tau_{Ex}, b) \mathbf{x}_{BM}. \quad (17)$$

Next, we adjust this economy by also using the new equilibrium prices in addition to the new tax

¹²It is also possible to compute the aggregate welfare over a certain population group if we take an integral of the value function with respect to the probability measure of that group.

¹³We follow ? in this welfare decomposition.

and transfer system, holding constant the benchmark distribution. Again, we compute the CEV λ^B :

$$\int v_{BM}(a, s, \lambda^B; r_{BM}, w_{BM}, \tau_{BM}) \mathbf{x}_{BM} = \int v_{EB}(a, s; r_{Ex}, w_{Ex}, \tau_{Ex}, b) \mathbf{x}_{BM}. \quad (18)$$

An alternative way to calculate the aggregate CEV is then given by the following equation:

$$\lambda = \underbrace{\lambda^A}_{\text{CEV from changes in tax \& transfer system}} + \underbrace{(\lambda^B - \lambda^A)}_{\text{CEV from changes in eq. prices}} + \underbrace{(\lambda - \lambda^B)}_{\text{CEV from changes in eq. distributions}}. \quad (19)$$

The first term of Equation (19) measures the aggregate welfare changes stemming from changes in the tax and transfer system neglecting implied changes in equilibrium prices and distribution. The second term shows the added welfare change incurred by changes in equilibrium prices. The last term measures the additional welfare change induced by changes in equilibrium distribution.

The decomposition results are presented in Table 12.¹⁴ It is striking that most of the welfare gains are obtained by improvements in the distribution as shown in the previous section. Those gains account for 79 percent and 63 percent of the overall welfare increase for experiment I and experiment II, respectively. This is mainly due to the fact that the utilitarian welfare function emphasizes redistribution since the households' utility function is concave in consumption. The direct effects of the tax reforms are of secondary importance. In experiment I, increasing the TMTR while decreasing other marginal tax rates only explains 28 percent of the aggregate welfare gain if we ignore implied changes in equilibrium prices and distribution. This result also shows that general equilibrium effects need to be taken into account when evaluating tax reforms. It is worth noting that the direct effects of our tax reform in experiment II are much higher than in experiment I because the universal transfer directly benefits those workers who are borrowing-constrained or retired, as can be observed in Appendix B.2. Lastly, changes in the equilibrium prices, namely, the lower wage and higher interest rate cause an overall welfare loss.

5 Conclusion

In this paper we analyze the macroeconomic effects of raising the top marginal income tax rate in a dynamic general equilibrium model with heterogeneous agents and an elaborate fiscal structure. We perform two policy experiments. In both experiments, the top marginal statutory tax rate increases from 35 to 70 percent, but they differ in the way government budget balance is maintained: The government redistributes the additional tax revenue among households either by decreasing all other marginal tax rates or paying out a lump-sum transfer to all households.

We find that increasing the top marginal tax rate decreases income and wealth inequality. At the same time, the overall economy is experiencing a loss in efficiency which is largely caused by reductions in consumption and savings by top income earners. The rest of the population that is not directly affected by the tax increase largely benefits and sees its earnings and consumption increase in some cases. As a result, the aggregate gain in welfare measured by consumption equivalent variation is fairly large: 2.7 percent in the first experiment and 2.8 percent in the second. Negative welfare effects caused by changes in equilibrium prices are compensated by more favorable effects caused by the changed tax and transfer system and greater redistribution.

¹⁴We have conducted the same decomposition exercise changing the order of the marginal changes to the hypothetical economies. The results are very similar.

In this paper, we do not attempt to make any normative suggestions on the subject of whether or not taxes on the rich should be increased. The Journal of Economic Perspective recently featured a discussion between Mankiw et al. (2009) and Diamond and Saez (2011) providing very different opinions on the optimal taxation of top income earners. While Mankiw et al. (2009) support declining tax rates at the top end of the income distribution, Diamond and Saez (2011) find optimal tax rates for top income earners between 50 and 80 percent. Our results seem to support the opinion put forth by Diamond and Saez (2011). So do more recent research papers such as the one by Kindermann and Krueger (2014). Their paper, while using a very similar modeling approach to ours, is focused on finding the optimal top marginal tax rate. We however are more interested in illustrating the mechanisms shaping the reaction of different groups in the economy to an increase in the top marginal tax rate. Our approach has of course limitations. The question whether you will become very rich is purely shaped by luck: If you reach the highest efficiency stage, your earnings will skyrocket and so will eventually your wealth. At the same time, you will face a high risk of losing this high level of efficiency. While this is a good way of modeling certain types of top income earners, such as sports stars, it seems inadequate for others, such as entrepreneurs. We leave it to future research to investigate how reactions would differ if these types of high income earners are also taken into account when looking at top income taxation.

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A Computational Strategy

We use the value function iteration method to calculate decision rules since it is hard to use the Euler equation iteration method given several non-differentiable functional forms of tax functions such as the step-wise personal income tax function and the capped payroll tax function, and the realistic definition of taxable income. The state space is $A \times S$, where $A = [0, a^{max}]$, and $S = [w1, \dots, w4, r1, \dots, r4]$. We set $a^{max} = 6,000$. The numbers of grid points for individual asset holdings and hours worked are 1451 and 201, respectively. The size of the state space is 11,608 points while that of the control space is 291,651. We employ the modified policy iteration algorithm to speed up convergence as suggested by Heer and Maussner (2011). Moreover, to shrink the control space we make most use of the monotonicity of the decision rules while allowing the possible violation of the monotonicity due to the complexity of the tax code.

We approximate the stationary distribution with a piecewise linearization of its associated probability density function following Ríos-Rull (1997). The grid for the distribution has 20,000 unequally spaced points. We take the integrals with respect to the distribution whenever computing distributional and aggregate statistics of the model economy.

B Tables

B.1 Taxation

Table B.1: U.S. Individual Marginal Income Tax Rates in 2007
(Married Household, Filed Jointly)

Taxable income	Marginal rate
\$0-\$15,650 [0 - 0.131]	10%
\$15,650-\$63,700 (0.131 - 0.534]	15%
\$63,700-\$128,500 (0.534 - 1.078]	25%
\$128,500-\$195,850 (1.078 - 1.643]	28%
\$195,850-\$349,700 (1.643 - 2.933]	33%
\$349,700- (2.933 -]	35%

In the brackets, taxable income relative to the GDP per household are presented. Source: <http://www.taxpolicycenter.org/index.cfm>

Table B.2: U.S. Federal and State and local government receipts in the fiscal year of 2007

	\$ Billion	% GDP
GDP	13861.4	100.00
Total federal and state and local Government Receipts	3715.9	26.81
Federal individual income taxes	1163.5	8.39
Social insurance and retirement receipts	869.6	6.27
Sales and gross receipts taxes	440.3	3.18
Estate and gift taxes	26.0	0.19
Corporation income taxes	430.9	3.11
State/local individual income taxes	290.3	2.09
Property taxes	388.7	2.80
Excise taxes	65.1	0.47
Other federal taxes	41.5	0.30

Statistics are obtained by combining Tables B-78, B-81, and B-86 of the *2011 Economic Report of the President*. Receipts from deposits of earnings by Federal Reserve System and transfers from federal government to local government and other local miscellaneous revenues are excluded from total federal and state and local government receipts in our calculation.

B.2 Results from Experiment II

In this section of the Appendix, we have collected all the results of Experiment II. Experiment II differs from Experiment I in the way that the government redistributes additional tax revenues to the population. It pays out a lump-sum transfer to all households instead of decreasing all statutory marginal income tax rates except the highest one, which it did in Experiment I and which we described extensively in the main text.

Table B.3: Effects on Group Averages: Population subject to TMTR (Top 1.17%) versus the Rest

	a	ϵl	l	c	$y_l + y_k$	$\%y_l$	$\%y_k$	$\%$ in Pop
Top 1.17% (subject to TMTR in benchmark economy)								
Benchmark	16.33	11.67	1.49	7.58	12.56	73.0	27.0	1.17
Experiment II	-41.4%	4.1%	-1.7%	-31.7%	-8.6%	9.1% <i>p</i>	-9.1% <i>p</i>	-63.9%
Rest of the population								
Benchmark	0.82	0.87	0.99	0.92	0.86	79.6	20.4	98.83
Experiment II	5.3%	-2.1%	-2.3%	0.7%	-0.4%	-2.2% <i>p</i>	2.2% <i>p</i>	0.8%

The level of each variable is expressed relative to its population mean.

As can be observed when comparing the upper panels of Table B.3 and Table 8, this hardly makes a difference for agents subject to the TMTR. Their labor supply reacts in much the same way as in Experiment I, as can be seen in Table B.4. The lower panel of Table B.3 shows that the lump-sum transfer in Experiment II leads to slightly different reactions by the rest of the population than the lower tax rates in Experiment I: It provides a disincentive to working and therefore, households reduce their labor supply more heavily and cannot increase their consumption by quite as much.

Table B.4: Effect on Group Averages: Households not subject to TMTR

	$s = 3$	$s = 4$	Rest
Share of Households	88.9%	2.5%	8.9%
Benchmark Labor Supply	1.32	0.71	0.0
Experiment II	-5.4%	+8.0%	-

This result holds for all subgroups along the income distribution, as Table B.5 shows: Households that receive a rebate instead of being subject to lower marginal tax rates always decrease their labor supply by more, and increase their consumption and savings by less (or even decrease it).

Table B.6 shows that the reactions by the rest of the population lead to a slightly smaller degree of redistribution than in Experiment I, while the effect on welfare is similar in size in both experiments (cf. Table B.7). When looking at the decomposition of the welfare effect, we observe that the direct effects of taxes and transfers is larger than in Experiment I because of the lump-sum transfer that directly benefits borrowing constrained and retired households.

Table B.5: Effect on Group Averages: Households not subject to TMTR

	a	el	l	c	$y_l + y_k$	$\%y_l$	$\%y_k$
Upper 20% (80-100%)							
Benchmark	2.35	2.73	1.40	1.95	2.64	81.4	18.6
Experiment II	-0.2%	-1.2%	-0.7%	-0.9%	-1.1%	-1.0%	1.0%
Middle 50% (30-80%)							
Benchmark	0.95	1.46	1.38	1.14	1.35	85.0	15.0
Experiment II	6.5%	-2.8%	-3.1%	0.0%	-1.6%	-2.0%	2.0%
Lower 30% (0-30%)							
Benchmark	0.33	0.43	1.28	0.58	0.42	81.9	18.1
Experiment II	15.2%	-2.5%	-2.5%	1.6%	0.6%	-3.4%	3.4%
Retirees							
Benchmark	0.57	0.00	0.00	0.68	0.13	0.0	100.0
Experiment II	8.4%			3.2%	13.2%		

The level of each variable is expressed relative to its population mean.

Table B.6: The Effect on the Distributions of Earnings and Wealth

	Gini	Quintiles					Top (%)		
		1st	2nd	3rd	4th	5th	90-95	95-99	99-100
Distribution of Earnings									
Benchmark	0.599	0.6	6.6	9.1	23.7	60.0	14.9	15.8	14.9
Experiment II	0.590	0.7	6.9	8.9	24.0	59.4	15.0	15.8	13.9
Distribution of Income after Taxes and Transfers									
Benchmark	0.537	5.3	6.9	7.3	22.5	58.0	14.5	15.3	14.8
Experiment II	0.510	5.8	7.3	7.9	23.3	55.6	14.7	15.5	11.9
Distribution of Wealth									
Benchmark	0.779	0.0	0.4	6.0	15.3	78.3	15.5	17.1	31.8
Experiment II	0.747	0.0	0.8	7.0	15.7	76.4	17.0	18.1	24.3

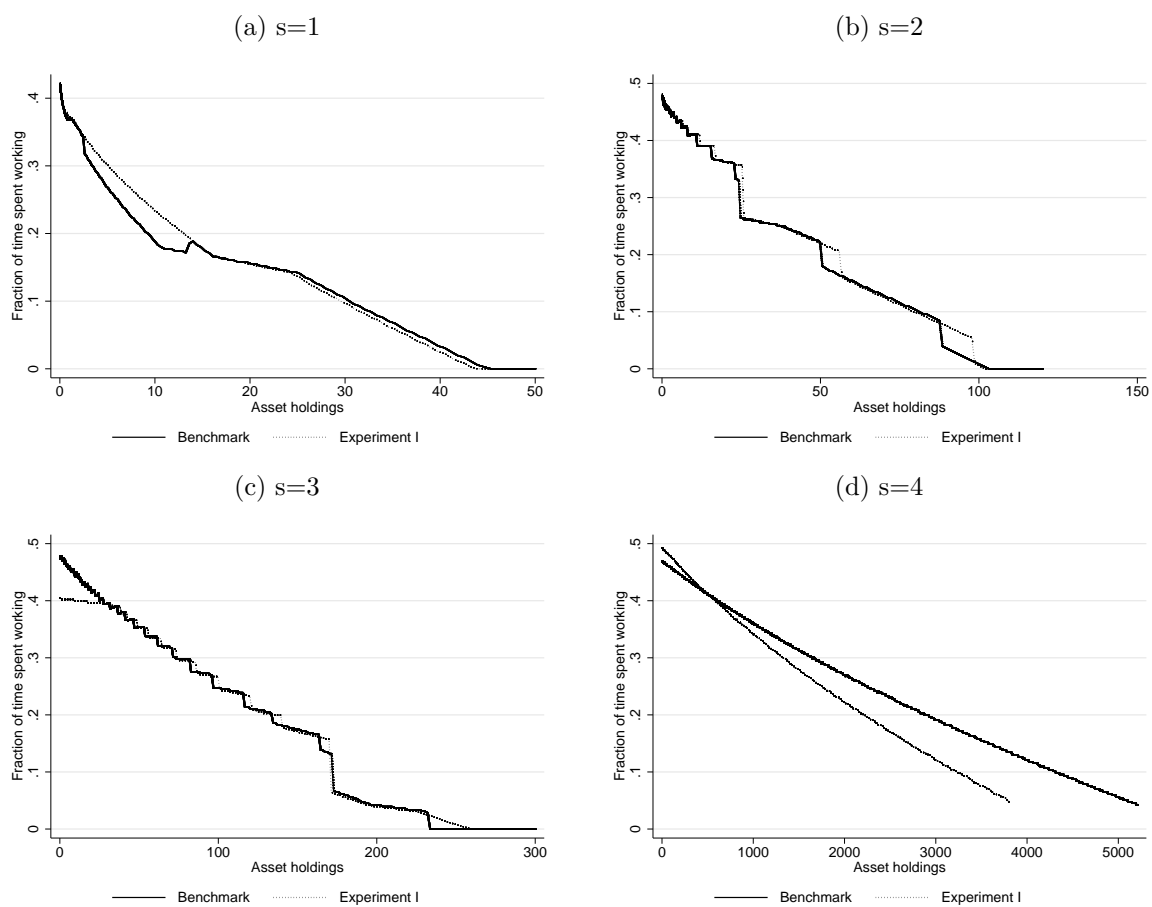
Table B.7: The Decomposition of Aggregate Welfare Changes

Description	Experiment II
Aggregate consumption equivalent variations (CEV, λ)	2.8%
Decomposition: Contributions to λ by Changes in:	
Taxes and transfers	+43.7%
Equilibrium prices	-6.3%
Equilibrium distributions	+63.0%

Each contribution to λ is computed by dividing the CEV from changes in each factor by the aggregate CEV. Adding up three contributions makes one hundred percent.

C Figures

Figure 2: Policy functions for labor, working households



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