## "THE ONE BIG BEAUTIFUL BILL"

Changes for tax year 2025



Provison	"One Big Beautiful Bill"	Prior Law
Bonus Depreciation	100% Bonus - now permanent	40%
R&D Expensing (Section 174)	Full expensing for Domestic R&E expenses in the year they occur (foreign = 15 years)	Domestic expenses amortized & capitalized over 5 years (foreign = 15 years)
Manufacturing Deductions	100% Expensing for certain Manufacturing structures. 168(n)	N/A
179D	Sunsets for property with construction beginning after 6/30/2026	Max benefit of \$5.81 per sq ft
45L	Sunsets for homes acquired after 6/30/2026	up to \$5,000 per dwelling unit
SALT	\$40,000 cap, phasing out at incomes >\$500,000 married	\$10,000 cap
Section 179	\$2.5M expensing limit; \$4M phase- out threshold; inflation indexing resets to 2024; effective for property placed in service after 12/31/2024.	\$1M expensing limit; \$2.5M phase- out threshold; indexed for inflation (base year 2019).
PTET (Pass Through Entity Tax)	Allows pass-through entities to deduct state taxes at the entity level, bypassing the \$40K SALT cap for owners	Allows pass-through entities to deduct state taxes at the entity level, bypassing the \$10K SALT cap for owners
199A Flow-Through Deduction	20% - now permanent	20%
163j Interest Deductions	EBITDA Standard	EBIT Standard
Clean Electricity Production - 48E / 45Y	Terminates tax credits for projects where construction begins 12 months after enactment and are placed in service after 2027.	Projects eligible if placed in service through 2032
Advanced Manufacturing Credit	35%	25%
Estate Tax Exemption	\$15M per individual (\$30M married) - permanent Effective: 1/1/2026, with automatic inflation indexing	\$13.99M per individual (\$27.98M married) Sunset: Reverts 1/1/2026 to ~\$5-7M (inflation-indexed)
Standard Deduction	\$15,750 (single) / \$31,500 (married)	\$15,000 (single) / \$30,000 (married)
Child Tax Credit	\$2,200 per child (adjusted for inflation, prospectively)	\$2,000 per child
No Tax on Tips and Overtime	Up to \$25,000	N/A
Auto Loan Interest Deduction	Up to \$10,000 for U.S. vehicles (phasing out >\$100k single/\$200k married)	N/A
Adoption Credit	\$5,000 of current credit made refundable (adjusted for inflation, prospectively)	Up to \$17,280, non-refundable
Deductions for Seniors	\$6,000 for age 65+ (individuals), phase out > \$75,000 single/\$150,000 married	\$1,600 for age 65+
1099-К	\$20,000 and >200 transactions	\$2,500