JOINT COMMITTEE ON TAXATION
September 14, 2026
JCX-48-26

ESTIMATED REVENUE EFFECTS OF H.R. 10357,
THE "DIGITAL ASSET TAX CERTAINTY ACT,"
SCHEDULED FOR MARKUP BY THE COMMITTEE ON WAYS AND MEANS ON SEPTEMBER 16, 2026

Fiscal Years 2027 - 2036

[Millions of Dollars]

Provision	Effective	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2027-36
I. REMOVING TAX BARRIERS TO THE USE OF DIGITAL ASSETS AS A MEDIUM OF EXCHANGE												
1. Treatment of de minimis digital asset fees	doaa 12/31/27	---	-87	-146	-172	-204	-242	-287	-341	-405	-482	-2,365
2. Simplified accounting for gain and loss on widely traded digital assets [1]	tyba 12/31/27	---	-7	-14	-14	-15	-17	-18	-18	-19	-20	-141
3. Treatment of U.S. dollar stablecoin transactions	tyba 12/31/26	*Negligible Revenue Effect*										
II. PROVIDING PARITY BETWEEN DIGITAL ASSETS AND COMPARABLE TRADITIONAL FINANCIAL ASSETS												
1. Transfers of traded digital assets pursuant to a lending agreement	tma DOE	*Negligible Revenue Effect*										
2. Dealers and traders of widely traded digital assets	tyba DOE	318	479	546	413	199	80	112	82	42	60	2,332
3. Digital asset trading safe harbor	tyba 12/31/25	*Negligible Revenue Effect*										
4. Charitable contributions of certain digital assets	tyba 12/31/26	-10	-41	-48	-55	-62	-69	-77	-84	-93	-102	-640
III. APPLYING EXISTING TAX ANTI-ABUSE RULES TO DIGITAL ASSETS												
1. Application of wash sale rules to traded digital assets	da DOI	121	228	211	204	180	159	156	153	150	147	1,707
2. Application of constructive sale rules to digital assets	csa DOI	31	50	45	39	32	25	17	12	10	11	272
3. Application of subpart F and PFIC rules	tyofcea DOE	20	41	45	50	56	62	67	73	76	80	571
4. Rules related to possessions for determining source of gain or loss on disposition of traded digital assets	tyba 12/31/26	5	15	15	15	15	15	15	15	16	16	141
5. Application of registration-required obligation rules	daia DOI	*No Revenue Effect*										
6. Certain rules related to character of gains and losses relating to digital assets	tyea DOE	*Negligible Revenue Effect*										
7. Miscellaneous provisions												
a. Distributions of traded digital assets from a partnership to a partner	dma 12/31/26	5	8	11	14	15	15	15	15	15	16	127
b. Traded digital assets taken into account in determining investment company status	tma 12/31/26	2	5	5	5	5	5	6	6	6	7	52
c. Certain stablecoin lending treated as indebtedness	tyba 12/31/26	23	28	33	39	45	54	63	75	88	104	552
d. Digital assets not treated as section 197 intangibles	daaa DOI	*Negligible Revenue Effect*										
e. Application of straddle rules to traded digital assets, etc.	pea DOE	16	22	18	15	12	9	8	8	8	9	125

Provision	Effective	2027	2028	2029	2030	2031	2032	2033	2034	2035	2036	2027-36
f. Backup withholding on illiquid digital assets paid for digital asset validation supporting activities..	sidara 12/31/26	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	[3]	1
IV. CLARIFYING THE TAX TREATMENT OF STAKING AND MINING												
1. Source and character of mining and staking income......................	tyba DOE	-4	-6	-3	1	7	14	21	25	24	23	101
2. Investment trusts engaged in digital asset staking..........................	tyea DOE	*Negligible Revenue Effect*										
V. ENSURING THAT OWNERS AND USERS OF DIGITAL ASSETS FACE AN APPROPIATE TAX COMPLIANCE BURDEN												
1. Broker requirements...	[4]	---	-6	-14	-41	-43	-44	-45	-46	-48	-51	-338
2. Establishment of Digital Asset Voluntary Disclosure Program...	DOE	*Negligible Revenue Effect*										
3. Treasury study and report	DOE	*No Revenue Effect*										
VI. DEFINITIONS, REGULATIONS; RULES OF CONSTRUCTION…..	**DOE**	***Estimate Included in Provisions Above***										
VII. FULL HOUSE ACT												
1. Reinstatement of rules for wagering losses............................	tyba 12/31/25	-160	-166	-174	-183	-192	-201	-221	-222	-233	-245	-1,997
NET TOTAL…………………………………………………………………………………		**367**	**563**	**530**	**330**	**50**	**-135**	**-168**	**-247**	**-363**	**-427**	**500**

Joint Committee on Taxation

NOTE: Details may not add to totals due to rounding. The date of enactment is assumed to be December 31, 2026. Estimates are preliminary and subject to change.

Legend for "Effective" column:

csa = constructive sales after
da = dispositions after
daaa = digital assets acquired after
daia = digital assets issued after
dma = distributions made after
doaa = disposition of assets after
DOE = date of enactment
DOI = date of introduction
pea = positions established after
sidara = specified illiquid digital assets received after
tma = transfers made after
tyba = taxable years beginning after
tyea = taxable years ending after
tyofcea = taxable years of foreign corporations ending after

[1] Estimate is stacked after item II.2., Dealers and traders of widely traded digital assets.
[2] Loss of less than $500,000.
[3] Gain of less than $500,000.
[4] Returns required to be filed, and statements required to be furnished, after December 31, 2027.