TAX ACT PROVISIONS

BENEFITS

TOPIC	OLD LAW	NEW LAW
Affordable Care Act Individual Mandate	Under the Affordable Care Act, individuals must have minimum essential (health) coverage or pay an "individual responsibility payment." The annual tax amount for 2017 and 2018 is $695.	The individual responsibility payment is reduced to $0 effective for months beginning after December 31, 2018.
Deduction for Excessive Employee Remuneration	For publicly traded companies, performance-based compensation and commissions are exempt from the $1 million cap on deductibility of compensation to certain executives. An executive's coverage by this rule is determined annually. Affected corporations are those required to register their securities under Section 12 of the Securities Exchange Act of 1934.	Performance-based compensation and commissions are no longer exempt from the deduction limit. Once an executive is covered by the deduction limit, he or she now continues to be subject to the limit for future years. Covered corporations now also include entities required to file reports under Section 15(d) of the Securities Exchange Act of 1934. The new law is applicable for tax years that begin after December 31, 2017, with limited grandfathering for compensation paid pursuant to a written binding contract in effect and not materially modified after November 2, 2017.
Qualified Bicycle Commuting Reimbursement	Qualified employer reimbursements of up to $20 per month for the cost of purchasing and maintaining a bicycle used for commuting to and from an employee's place of employment are excludible from the employee's gross income.	The exclusion does not apply to taxable years beginning after December 31, 2017, and before January 1, 2026.
Qualified Equity Grants	N/A	Non-public companies that make broad-based option and RSU grants must notify employees of the ability to elect to defer income recognition on exercise or settlement, for up to five years. Certain officers, owners, and highly compensated employees are not eligible to defer.
Recharacterization of Certain IRA and Roth IRA Contributions	Taxpayers may recharacterize contributions to one type of IRA (traditional or Roth) as a contribution to the other type of IRA.	The recharacterization rule may not be used to unwind a conversion from a traditional IRA to a Roth IRA effective for taxable years beginning after December 31, 2017.
Rollovers of Plan Loan Offsets	The period of time that a plan loan offset amount may be contributed to an eligible retirement plan as a tax-free rollover is 60 days from the date of the offset.	For plan loan offset amounts resulting from a plan termination or a participant's severance from employment, the rollover deadline is the due date for filing the federal income tax return for the taxable year in which the loan offset occurs, effective for taxable years occurring after December 31, 2017.

CORPORATE

TOPIC	OLD LAW	NEW LAW
Accounting for Inventories	Businesses where production, purchase, or sale of merchandise is a material income-producing factor must account for inventories and must also use the accrual method of accounting. Taxpayers with average gross receipts of less than $10 million may account for inventories as materials and supplies that are not incidental and use the cash method of accounting. Corporations and partnerships with corporate partners are limited to the $5 million average gross receipts test, while certain industries are required to account for inventories if their average gross receipts exceed $1 million.	The average gross receipts threshold is increased from $10 million to $25 million (indexed for inflation), regardless of industry. Taxpayers are allowed to treat inventories as materials and supplies that are not incidental or conform to the taxpayer's financial accounting treatment.
Cash Method of Accounting	Corporations and partnerships with corporate partners are limited to the $5 million average gross receipts test, while certain industries are required to account for inventories if their average gross receipts exceed $1 million.	The $5 million average gross receipts threshold for corporations and partnerships with corporate partners that are not allowed to use the cash method of accounting is increased to $25 million (indexed for inflation). There is no requirement that such businesses satisfy the threshold for all prior years.
Change to Section 481(a) Adjustments Upon Change in Accounting Method for S Corporations that Revoke their S Election	Generally, a C corporation may not use the cash method of accounting for income tax purposes; if an S corporation that uses the cash method becomes a C corporation, it must switch to the accrual method of accounting. As a result of such a change in accounting method, the corporation is required to take adjustments into account under the rules set forth in Section 481 and the Regulations thereunder. Generally, if the net adjustments decrease taxable income, they are taken into account entirely in the year of change, the first year under the new accounting method, and net adjustments that increase taxable income are taken into account ratably for four years beginning with the year of the change. In addition, existing law provides that, for an S corporation that becomes a C corporation, distributions to the extent of the corporation's accumulated adjustments account can be made during the one-year period following the conversion to a C corporation that are tax-free to the shareholders and instead are applied to reduce the shareholders' basis in their stock.	Under the Act, any Section 481(a) adjustments as a result of a change from the cash method of accounting to the accrual method of accounting following the revocation of the S corporation election as an "eligible terminated S corporation" will be taken into account ratably over a six year period (as opposed to a four year period under prior law). An "eligible terminated S corporation" is a corporation that (1) is an S corporation on the date the new tax bill is enacted, (2) revokes its S corporation election during the two year period beginning on the date of enactment of the new tax bill, and (3) the owners and their respective ownership percentages on the date the bill is enacted are the same as those on the date the S corporation election is revoked.

TAX ACT PROVISIONS

CORPORATE

TOPIC	OLD LAW	NEW LAW
Contributions to Capital of a Corporation - Section 118 - Elimination of Exclusion from Gross Income for Grants by Government Entities and Civic Groups	Existing Section 118 provides the general rule that "contributions to capital" of a corporation are not includible in gross income of the corporation, but contributions in aid of construction and any other contribution as a customer or potential customer are not "contributions to capital" and are therefore taxable to the corporation. Existing Section 118 provides an additional exception that qualifying contributions in aid of construction that are made to a regulated public utility providing water or sewage disposal services are excludible from the gross income of a corporation.	Under the Act, the general provision of Section 118, that contributions to capital are excluded from gross income of a corporation, are preserved, but the exception from that exclusion is expanded so that contributions to a corporation made by any governmental entity or civic group are not treated as "contributions to capital" falling within the general exclusion from gross income under Section 118(a). However, if any such contribution is made in exchange for stock or in the contributor's capacity as a shareholder of the corporation, then the contribution should still qualify for exclusion from gross income. In short, under the new law, grants received by a corporation from government entities and civic groups (as are often made by localities to entice businesses to build or move there) should generally be taxable to the corporation unless some other exclusion applies.
Corporate Tax Rate	The current corporate tax rates are: 15% for $0 - $50,000 of taxable income; 25% for $50,001 - $75,000 of taxable income; 34% for $75,001 - $10,000,000 of taxable income; and 35% for taxable income exceeding $10,000,000. Personal service corporations are not entitled to use the graduated rates below the 35% rate.	For tax years beginning after December 31, 2017, a 21% flat corporate tax rate applies. In addition, no special rate applies to personal service corporations. The dividends received deduction is reduced from the 80% DRD to 65% and the 70% DRD to 50%.
Depreciation Deductions for Nonresidential Real Property and Residential Rental Property	The recovery period for most nonresidential real property and residential rental property is 39 years and 27.5 years, respectively.	The Act does not provide any change to the recovery periods for nonresidential real property and residential property. There are no separate definitions of "qualified leasehold property," "qualified restaurant property," and "qualified retail improvement property." Any real property trade or business electing out of the interest expense deduction limitation must use ADS to depreciate its nonresidential real property, residential rental property, and qualified improvement property. The ADS recovery period is reduced to 30 years for residential rental property. These changes apply to property placed in service after December 31, 2017, and the changes related to the electing real property trade or business apply to tax years beginning after December 31, 2017.
Like-Kind Exchanges of Real Property	No gain or loss is recognized to the extent the property is held for productive use in the taxpayer's trade or business; the property is held for investment purposes; or the property is exchanged for property of a like-kind that also is held for productive use in a trade or business or for investment.	The tax reform limits nonrecognition of gain for like-kind exchanges to real property that is not held primarily for sale. This new rule applies to exchanges completed after December 31, 2017. An exception exists for all exchanges, including those involving personal property, if either the property being exchanged or the property received is exchanged or received on or before December 31, 2017.
Limitation on Business Interest Expense Deduction	Interest paid or accrued by a business generally is deductible in the computation of taxable income, subject to certain limitations.	Generally, the net interest expenses incurred by a business are limited to the sum of the business interest income, 30% of the business's adjusted taxable income, and floor plan financing interest. Businesses with average annual gross receipts of $25 million or less are exempt from the limit, and disallowed interest can be carried forward indefinitely. Real property trades or businesses that use ADS may elect out of the business interest deduction limitation.
Low Income Housing Credit	The low-income housing credit may be claimed over a 10-year period for the cost of building rental housing, a sufficient portion of which is rent-restricted and occupied by tenants having incomes below specified levels.	No change.
New Markets Tax Credit	Currently, taxpayers may take advantage of a new markets tax credit for qualified equity investments made to acquire stock in a corporation, or a capital interest in a partnership, that is a qualified community development entity. The amount of credit is 5% for the year in which the equity interest is purchased from the qualified community development entity and the subsequent two years, and then 6% for each of the following four years.	No change.
NOL Deduction	Net operating losses may generally be carried back two years and carried forward 20 years to offset taxable income in such years. Carry back rules may be extended for certain types of losses.	Net operating loss deductions are limited to 80% of taxable income and provided that amounts carried to other years be adjusted to account for the limitation for losses arising in tax years beginning after December 31, 2017. The two year carry back rule is repealed (except for farming businesses and certain property and casualty insurance businesses). Unused net operating losses may be carried forward indefinitely.

TAX ACT PROVISIONS

CORPORATE

TOPIC	OLD LAW	NEW LAW
Rehabilitation Credit	Currently, a two-tier tax credit for rehabilitation expenditures provides for a 20% credit for qualified rehabilitation expenditures with respect to certified historic structures, and a 10% credit for qualified rehabilitation expenditures with respect to a qualified rehabilitated building, which generally means a building that was first placed in service before 1936.	The Act provides a 20% credit (to be claimed ratably over a five year period commencing in the tax year the property is placed in service) for qualified rehabilitation expenditures with respect to certified historic structures. The 10% credit is repealed.
Section 179 Expensing	Taxpayers generally must capitalize the cost of property used in a trade or business or held for the production of income and recover the cost over time through annual deductions. Tangible property is generally depreciated under the MACRS, which determines depreciation for different types of property based on an assigned applicable depreciation method, recovery period, and convention. Taxpayers may elect to deduct the cost of qualifying property, rather than to recover such costs through depreciation deductions. The maximum amount a taxpayer may expense is $500,000 of the cost of qualifying property placed in service for the taxable year.	Taxpayers may now expense $1 million worth of property placed in service during the taxable year. The phase-out threshold is also increased to $2.5 million. Both figures are indexed for inflation. Certain changes to the definition of qualified real property now include qualified improvement property and certain improvements (roofs, heating, ventilation, and air-conditioning property, fire protection and alarm systems, and security systems) made to nonresidential real property.
Temporary 100% Expensing for Certain Business Assets	Taxpayers generally must capitalize the cost of property used in a trade or business or held for the production of income and recover the cost over time through annual deductions. An additional first-year depreciation deduction is allowed equal to 50% of the adjusted basis of qualified property acquired and placed in service before January 1, 2020, with certain phasedowns.	Taxpayers may now expense property placed in service after September 27, 2017, as follows: 100% for property placed in service after September 27, 2017, and before January 1, 2023; 80% for property placed in service after December 31, 2022, and before January 1, 2024; 60% for property placed in service after December 31, 2023, and before January 1, 2025; 40% for property placed in service after December 31, 2024, and before January 1, 2026; and 20% for property placed in service after December 31, 2025, and before January 1, 2027. Property with longer production periods is subject to different rate phasedowns. There is no longer a requirement that the original use of the qualified property commence with the taxpayer. The present-law phasedown of bonus depreciation applies to property acquired before September 28, 2017.

ESTATE & GIFT

TOPIC	OLD LAW	NEW LAW
Estate, Gift, and Generation-Skipping Transfer Tax	The federal estate and gift tax exclusion amount and generation-skipping transfer tax exemption amount is $5 million (with inflation adjustments). As adjusted for inflation, the estate and gift tax exclusion amount and generation-skipping transfer tax exemption is $5,490,000 for 2017 and $5,600,000 for 2018.	The Act increases the federal estate and gift tax exclusion amount and generation-skipping transfer tax exemption amount to $10 million (with inflation adjustments), effective for decedents dying after 2017 and before 2026. As adjusted for inflation, the estate and gift tax exclusion amount and generation-skipping transfer tax exemption is $11.2 million. A married couple will have a combined $22.4 million of exemption that can pass tax-free in 2018. The Act does not provide for a repeal of the estate tax at any point in the future.

TAX ACT PROVISIONS

INDIVIDUAL

TOPIC	OLD LAW	NEW LAW
Charitable Contributions	Generally, the adjusted gross income limitation on cash contributions to public charities is 50%.	The Act increases the adjusted gross income limitation on cash contributions to public charities from 50% to 60%, effective for contributions made in tax years beginning after 2017 and before 2026.
Enhancement of Child Tax Credit and New Family Tax Credit	The child tax credit is $3,000 for one child or $6,000 for two or more children.	The Act changes the child tax credit to $2,000 per child, with up to $1,400 of it being refundable.
Exclusion for Qualified Moving Expense Reimbursements	Employer-provided moving expense reimbursements are excludible from an employee's gross income if the expenses would be deductible moving expenses if directly paid or incurred by the employee.	The exclusion does not apply to taxable years beginning after December 31, 2017, and before January 1, 2026, except with respect to members of the Armed Forces.
Individual Alternative Minimum Tax	The exemption amount is $84,500 for married taxpayers filing jointly, with a phase-out of the exemption at $160,900 for married taxpayers filing jointly.	The Act increases the alternative minimum tax exemption amounts for individuals to $109,400 for married taxpayers filing jointly, with a phase-out of the exemption at $1,000,000 for married taxpayers filing jointly. This provision is in effect for tax years beginning after December 31, 2017 and before January 1, 2026.
Medical Expense Deduction	Beginning January 1, 2017, all taxpayers may deduct only the amount of the total unreimbursed allowable medical care expenses for the year that exceeds 10% of the individual's adjusted gross income.	For tax years beginning after December 31, 2016, and ending before January 1, 2019, the Act reduces the medical expense deduction floor to 7.5% of adjusted gross income and eliminates the minimum tax preference.
Miscellaneous Itemized Deductions--2% Floor	If deductions are itemized, certain miscellaneous itemized deductions are deductible only to the extent they exceed 2% of the taxpayer's adjusted gross income.	The Act suspends all miscellaneous itemized deductions that are subject to the 2% floor under present law for tax years beginning after December 31, 2017, and before January 1, 2026. The Act suspends the overall limitation on itemized deductions for tax years beginning after December 31, 2017, and before January 1, 2026.
Mortgage Interest Deduction	The mortgage interest deduction allows taxpayers to reduce their taxable income by the amount of interest paid on the loan which is secured by the home, but the deductions must be itemized and must exceed the standard deduction. The interest is deductible on only the first $1 million of debt used for acquiring, constructing, or improving the home or the first $100,000 of home equity debt.	The Act suspends the mortgage interest deduction with respect to interest on home equity indebtedness for years beginning after December 31, 2017, and before January 1, 2026.
Section 529 Education Plan	Section 529 Education Plans may only be used to pay for college.	The Act provides that, with respect to contributions made to a Section 529 Education Plan after December 31, 2017, elementary and secondary school expenses of up to $10,000 per year would be qualified expenses.
Standard Deduction	For tax year 2017, the standard deduction is $12,700 for married taxpayers filing a joint return and $6,350 for single filers.	The Act increases the standard deduction to $24,000 for married taxpayers filing a joint return and $12,000 for single filers. The standard deduction is increased for inflation.
State and Local Tax Deduction	A taxpayer has the option of deducting sales, income, or property taxes.	The Act provides that individual taxpayers may elect to deduct sales, income, or property taxes up to $10,000 for tax years beginning after December 31, 2017, and beginning before January 1, 2026. For amounts paid in a tax year beginning before January 1, 2018, with respect to state or local income taxes, beginning after December 31, 2017, the payment is treated as if paid on the last day of the tax year for which such tax is imposed for purposes of applying the limitation of the deduction. This provision effectively limits the opportunity to pre-pay 2018 (or future year) state income tax liability in 2017.
Tax Rates (Capital Gains)	The breakpoint between 0% and 15% rates for married taxpayers filing jointly is $75, 900 for 2017. The breakpoint between 15% and 20% rates for married taxpayers filing jointly is $470,700.	Capital gains tax rates are retained under the Act. The breakpoint between 0% and 15% rates for married taxpayers filing jointly is $77,200, and the breakpoint between the 15% and 20% rates for married taxpayers filing jointly is $479,000. The above 15% and 20% threshold amounts would apply to tax years beginning after December 31, 2017, and before January 1, 2026.
Tax Rates (Income)	The seven tax brackets are 10%, 15%, 25%, 28%, 33%, 35%, and 39.6%. Married taxpayers filing jointly reach the top bracket at $470,700 of income.	The Act lowers individual income tax rates, with seven tax brackets: 10%, 12%, 22%, 24%, 32%, 35%, and 37%. Married taxpayers filing jointly reach the top bracket at $600,000 of income. The rates are in effect from January 1, 2018, through December 31, 2025.

INTERNATIONAL

TOPIC	OLD LAW	NEW LAW
100% Deduction for Foreign-Source Portion of Dividends & Repatriation	The current tax is part of a worldwide system which is imposed on dividends paid from foreign corporations, subject to available foreign tax credits.	The Act moves the tax closer to a territorial system. There is a 100% deduction for United States shareholder corporations on foreign source dividends (not applicable to RICs or REITs) for distributions made after December 31, 2017. There is a one year holding period requirement. The deduction is not applicable for hybrid dividends (dividends eligible for deduction in the United States and under local laws). There is no foreign tax credit or deduction permitted for qualifying dividends.
Base Erosion	N/A	GILTI Income United States corporate shareholders of CFCs are subject to tax on 50% of "global intangible low-taxed income" ("GILTI") . This is meant to tax intangible income earned in excess of routine return. A foreign tax credit of 80% is allowed. There is a 37.5% deduction for foreign-derived intangible income ("FDII") of a United States trade or business. The rates are applicable for tax years beginning after December 31, 2017, and before January 1, 2026. The deductions change to 21.875% for FDII and 37.5% for GILTI for years beginning after December 31, 2026. Base Erosion Minimum Tax This minimum tax is equal to the excess of 10% (5% in 2018, 12.5% for tax years beginning after December 31, 2025) of modified taxable income over regular tax liability. Some foreign tax credits are allowable.
Foreign Tax Credit	Direct and indirect foreign tax credits are available.	The Act repeals indirect tax credits under Section 902. Section 960 credits are determined on a current year basis. The Act applies to taxable years of foreign corporations beginning after December 31, 2017.
Subpart F	The anti-deferral regime taxes certain foreign earnings with foreign tax credit.	The Subpart F regime generally remains in place with certain modifications. A foreign tax credit of 80% is allowed.
Tax Gain on the Sale of Partnership Interest on Look-Through Basis	Under Rev. Rul. 91-32, a foreign partner's gain or loss on the sale or exchange of a partnership interest is taxable in the United States to the extent of the partnership's assets effectively connected with a United States business (i.e., based on aggregate look-through basis rather than on entity basis). *Grecian Magnesite Mining v. Commissioner* , 149 T.C. No. 3 (July 13, 2017) rejected Rev. Rul. 91-32 and argued for application of entity approach holding that such gain or loss is generally foreign source.	The Act effectively codifies Rev. Rul. 91-32 for dispositions on or after November 27, 2017. It imposes a 10% withholding on the transferee (or agent) for dispositions after December 31, 2017.
Toll Charge	N/A	The Act creates a mandatory tax on post-86 untaxed accumulated foreign earnings of specified foreign corporations. The earnings are determined as of either November 2, 2017, or December 31, 2017. The earnings are taxed at either 15.5% (cash and cash-equivalents) or 8% (illiquid assets). The tax is effective for the last taxable year of a foreign corporation beginning before January 1, 2018. It can be paid in installments over eight years. There is a proportional haircut on foreign tax credits attributable to earnings.

PASS-THROUGH ENTITIES

TOPIC	OLD LAW	NEW LAW
Carried Interest	"Carried interests," or partnership interests issued in connection with the performance of substantial services that consist of engaging in capital market transactions or other specified investments, are eligible for capital gain treatment and preferential tax rates after being held for one year.	Carried interests must satisfy a three-year holding period before being eligible for preferential long-term capital gains rate.
New Deduction for Pass-Through Income	The net income of sole proprietorships, partnerships, and S corporations flow through to the respective owners and shareholders on their individual tax returns. Such income, therefore, is effectively subject to individual income tax rates.	Beginning January 1, 2018, and continuing through December 31, 2025, new Code Section 199A generally permits a deduction of 20% for non-corporate taxpayers with qualified business income ("QBI") from a partnership, S corporation, or sole proprietorship (each a "Flow-Through Entity"), subject to certain limitations and exceptions. QBI generally includes all domestic business income of a Flow-Through Entity other than (1) certain investment items, (2) reasonable compensation paid to the taxpayer for services rendered to the Flow-Through Entity, (3) guaranteed payments to a partner under Code Section 707(c), or (4) payments under Code Section 707(a) to a partner for services rendered with respect to the Flow-Through Entity. The 20% deduction is limited in certain instances, however, by a "W-2 Wage Limit." The W-2 Wage Limit, generally, is equal to the greater of (1) 50% of the taxpayer's pro rata share of the Flow-Through Entity's "W-2 Wages," which include wages subject to wage withholding, elective deferrals, and deferred compensation paid by the Flow-Through Entity for the taxable year, or (2) the sum of 25% of the Flow-Through Entity's W-2 Wages and 2.5% of the unadjusted basis, immediately after acquisition, of all qualified property. The W-2 Wage Limit phases in for taxpayers with taxable income exceeding $157,500 ($315,000 in the case of joint filers), and they are fully phased in for taxpayers with taxable income in excess of $207,500 ($415,000 for joint filers). In a "Specified Service Business," the 20% deduction applies fully if the taxpayer's taxable income is less than $157,500 ($315,000 for joint filers), but no deduction is available for taxpayers with taxable income exceeding $207,500 ($415,000 for joint filers). A partial deduction is available if taxable income is between those two limits. A "Specified Service Business" includes accounting, law, consulting, and investing, but excludes engineering and architecture services.
Partner's Share of Partnership's Deductions for Charitable Contributions and Foreign Taxes No Longer Exempted from the Basis Limitation on Partner Losses	Under existing law, partners in a partnership or limited liability company taxed as a partnership can take deductions for their share of the partnership's charitable contributions or foreign taxes without regard to the limitation on recognition of losses in excess of the partner's outside basis in his partnership interest.	Under the Act, charitable contributions and foreign taxes are no longer exempt, and partners are not be able to use those deductions unless they have sufficient outside basis in their partnership interest.
Technical Termination of Partnership	Pursuant to Code Section 708(b)(1)(B), a partnership is deemed to have terminated if, within any 12-month period, there is a sale or exchange of 50% or more of the total interest in partnership capital and profits. As a result of this "technical termination," the partnership is treated as having (1) contributed all of its assets and liabilities to a new partnership in exchange for an interest in that new partnership, and (2) distributed such interests in the new partnership to the purchasing and remaining partners. The technical termination necessitates a final partnership return of the old partnership, and it causes many of the tax attributes of the old partnership to terminate. Further, many of the old partnership's elections cease to apply, and the old partnership's depreciation recovery periods restarts.	Beginning January 1, 2018, the technical termination rule under Code Section 708(b)(1)(B) is repealed.

TAX-EXEMPT ORGANIZATIONS

TOPIC	OLD LAW	NEW LAW
Excise Tax on Investment Income of Private Colleges and Universities	Private colleges and universities are generally treated as public charities. Currently, public charities are not subject to any excise tax on net investment income, however, private foundations are subject to an excise tax on net investment income.	For taxable years beginning after December 31, 2017, an excise tax will be imposed on an applicable educational institution for each taxable year equal to 1.4% of the net investment income for the taxable year. An applicable educational institution includes only institutions with at least 500 students and more than 50% of the tuition paying students of which are located in the U.S. The Secretary will promulgate regulations to describe the computation of net investment income, and assets, that trigger the excise tax. The criteria used to determine what colleges qualify for a new excise tax is yet to be determined.
Excise Tax on Tax-Exempt Organization Executive Compensation	N/A	Under the Act, there is an excise tax of 21% on tax-exempt and governmental organizations that pay (1) in excess of $1 million or (2) severance pay equal to or greater than three times average five year compensation. Excise tax applies to payments to covered employees. Covered employees are the five most highly compensated employees for any tax year beginning in 2017 or later (employees earning $120,000 or less are excluded). 280G golden parachute concepts are applied in calculating the tax. Fees for medical or veterinary services are exempt compensation. Certain tax-qualified benefits are also exempt. The excise tax is imposed for taxable years beginning on or after December 31, 2017.
Unrelated Business Taxable Income	Organizations that are exempt from federal income taxation under Code Section 501(a) are currently allowed to consolidate unrelated business income and expenses from unrelated trades or businesses.	The Act provides that exempt organizations with more than one trade or business will be required to compute their unrelated business income separately with respect to each trade or business. Net operating loss deductions after December 31, 2017 may only offset future unrelated business income with respect to the trade or business for which the loss arose. Prior year net operating losses will be allowed to be carried forward and will not be subject to the new rule.