Multilevel taxation, competition, and sorting: Evidence from regional borders

Federico Revelli* Roberto Zotti*

*Department of Economics and Statistics Cognetti de Martiis, University of Torino °CFSifo

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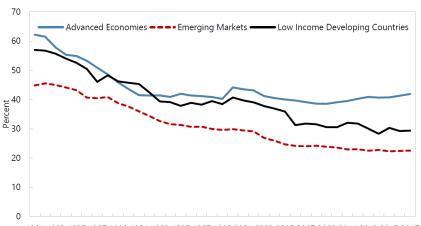
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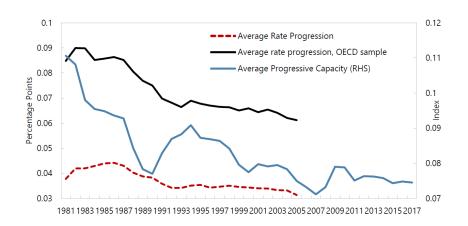
- Tax policy can affect income distribution and reduce inequality
 through progressive personal income taxation, i.e., average tax rates
 rising with income
- flat income tax rates combined with personal allowances/deductions
- multiple increasing marginal tax rates
- Across the world, the degree of personal income tax progressivity has declined sharply in the 1980s and 1990s, and has remained broadly stable since then

Top personal income tax rates (IMF, 2018)



1981 1983 1985 1987 1989 1991 1993 1995 1997 1999 2001 2003 2005 2007 2009 2011 2013 2015 2017

Tax progressivity (IMF, 2018)



Framework of this paper

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- In Italy, the national personal income tax structure is progressive; in addition, <u>local governments</u> are allowed to set progressive personal income tax surcharges
- Regions (20) and municipalities (\sim 8,000) set progressive surcharges (0-5%) that add to the progressive national income tax schedule (23-43%)

Italy: regional and municipal borders



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- Does rich taxpayers' tax-induced mobility put a constraint on the ability of local governments to redistribute income?
- How do local governments behave in the presence of taxpayers' mobility?
- Is it a good idea to assign ability-to-pay (redistributive) taxes to local governments? Or benefit taxes (charges, fees for service consumption) would be preferable?

Objectives of this paper

• First, estimate the response of individual location decisions (high-income taxpayers) to local income tax differentials in complex multi-tiered fiscal structures like the Italian one

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- Second, explore the potential consequences of taxpayers' mobility on local government fiscal choices (tax competition)

Methodology

 Basic aim of the paper is to compare the results that are obtained when employing different econometric approaches ('traditional' versus 'new') to the estimation of: a) response of taxpayers' location to local taxes; b) fiscal reaction functions

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- these are challenging empirical exercises because of: I) simultaneity of decisions of potentially mobile taxpayers and governments at different spatial locations; II) presence of several potential confounders (quality of public services, amenities, labour and housing markets)

Brief literature review

- Brief literature review
- Theoretical set-up: multilevel income taxation (multiple fiscal federations structure)

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- 6 Conclusions

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- Data limitations: information on migration patterns & reliable measures of earnings & detailed fiscal structures at possible locations (rates, exemptions, special provisions, ...)
- Identification challenges: ideally one needs to find local tax variation that is orthogonal to all other factors affecting individual location choices, such as local labor markets conditions, local amenities and public goods

Income tax base mobility: recent works

 Martinez (2017): difference-in-differences approach: regressive income tax reform in the canton of Obwalden (Switzerland), using nearby cantons as controls; share of high-income taxpayers and taxable income raise after the reform.

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- Agrawal and Foremny (2019): regional pairwise origin-destination approach: fiscal decentralization reform in Spain; significant impact of regional taxes on high-income taxpayers' location choices

Income tax reaction functions

• Eugster and Parchet (2019): Switzerland: even if nearby jurisdictions have differences in preferences that should lead to different income tax policies, being close reduces tax differentials through competition for mobile individuals: smooth tax gradient from strategic behavior of local governments anticipating fiscally-induced sorting.

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- Parchet (2019): estimates a local income tax reaction function in a multi-tiered structure of government, finding a negative slope (local tax rates strategic substitutes)

2. Theoretical set-up: multilevel income taxation

• Structure of government: multiple $(\overline{R} \ge 2)$ two-tiered fiscal federations (Agrawal, 2016). Each is made of an upper-tier (regional) authority $R = 1, ..., \overline{R}$ producing public good g_R , and of N_R lower-tier (municipal) governments m(R) producing public good $g_{m(R)}$

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- Household preferences: strictly quasi-concave utility function $u(c_{m(R)},h_{m(R)},g_R,g_{m(R)})$, where $c_{m(R)}$ denotes composite numeraire private consumption and $h_{m(R)}$ denotes housing consumption of a taxpayer residing in locality m(R)

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- Regional and municipal public goods funded respectively by income taxes set at each tier on residents' gross income y: $i_R(y)$ and $i_{m(R)}(y)$ are the tax schedules, with: $i_R'(y), i_{m(R)}'(y) \geq 0$; $\bar{i}_R(y)$ and $\bar{i}_{m(R)}(y)$ denote average rates

• Taxpayer's budget constraint:

$$p_{m(R)}h_{m(R)} + c_{m(R)} \le y \left[1 - \bar{i}_R(y) - \bar{i}_{m(R)}(y)\right]$$

where $p_{m(R)}$ price of housing

15 / 29

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• Indirect utility function of a resident in locality m in region R:

$$\begin{array}{lcl} u(c_{m(R)}^{*},h_{m(R)}^{*}) & = & v(y,p_{m(R)},\overline{i}_{R},\overline{i}_{m(R)},g_{R},g_{m(R)}) \\ & = & \frac{1}{\alpha}y^{\alpha}\left[\overline{k}_{m(R)}(y)\right]^{\alpha} - \frac{1}{\beta}p_{m(R)}^{\beta} + \frac{1}{\rho}g_{R}^{\rho} + \frac{1}{\mu}g_{m(R)}^{\mu} \end{array}$$

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ullet where $c_{m(R)}^*$ and $h_{m(R)}^*$ are optimal consumption levels, and

$$\overline{k}_{m(R)}(y) \equiv 1 - \overline{i}_R(y) - \overline{i}_{m(R)}(y)$$

is the average net-of-tax (retention) rate

• with perfect mobility, utility must be equalized in all jurisdictions

$$v(y,p_{m(R)},\bar{i}_{R},\bar{i}_{m(R)},g_{R},g_{m(R)})=v(y,p_{n(F)},\bar{i}_{F},\bar{i}_{n(F)},g_{F},g_{n(F)})$$

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16 / 29

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- under standard assumptions, public goods capitalise positively and average income tax rates capitalise negatively into housing prices
- where do high-income taxpayers prefer to live?

16 / 29

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• Marginal rate of substitution between housing rent and average net-of-tax rate at location m(R) is:

$$\mathit{MRS}_{p\overline{k}} = -\frac{\partial v/\partial \overline{k}}{\partial v/\partial p} = \frac{y^{\alpha} \left[\overline{k}_{m(R)}(y)\right]^{\alpha-1}}{p_{m(R)}^{\beta-1}} > 0$$

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and it is unambiguously increasing in gross income y:

$$= \frac{\partial MRS_{p\overline{k}}}{\partial y}$$

$$= \frac{\alpha y^{\alpha-1} \left[\overline{k}_{m(R)}(y) \right]^{\alpha-1}}{p_{m(R)}^{\beta-1}} \left[1 + \frac{(1-\alpha)y \left(\overline{i}_R' + \overline{i}_{m(R)}' \right)}{\alpha \overline{k}_{m(R)}(y)} \right] > 0$$

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• high-income taxpayers have higher willingness to pay for lower taxes

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Empirical implications

• First, the number of high-income taxpayers residing in any locality (and their tax base) is an increasing function of the average consolidated (municipal+regional) net-of-tax rate in that locality

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- First, the number of high-income taxpayers residing in any locality (and their tax base) is an increasing function of the average consolidated (municipal+regional) net-of-tax rate in that locality
- Second, the optimal income tax policy of a local authority depends on the tax policies of the other authorities

 Start from log-log specification in a panel data two-tiered structure framework:

$$\ln \left(y_{m(R)t}^h \right) = \lambda \ln \left(k_{m(R)t}^h \right) + \ln \left(\mathbf{x}_{m(R)t} \right)' \gamma + \varepsilon_{m(R)t}$$

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 where the top consolidated marginal net-of-tax rate is employed as a proxy of the average consolidated net-of-tax rate:

$$k_{m(R)t}^{h} = 1 - i_{Nt}^{h} - i_{Rt}^{h} - i_{m(R)t}^{h}$$

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• where i_{Nt}^h is the top national income tax rate, and $\varepsilon_{m(R)t}$ includes municipal fixed effects $(\ell_{m(R)})$ and region-year (s_{Rt}) fixed effects:

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4. Fiscal reaction function

Is the tax policy of a municipality influenced by the tax policies of neighboring authorities? Do they affect each other in income tax policy making?

$$i_{m(R)t}^{h} = \rho i_{-m(R)t}^{h} + \phi i_{Rt}^{h} + \delta i_{-Rt}^{h} + \psi_{m(R)t}$$

$$i_{-m(R)t}^{h} = \sum_{j \in R} w_{mj} i_{j(R)t}^{h} + \sum_{k \in F \neq R} w_{mk} i_{k(F)t}^{h}$$

$$\sum_{j \in R} w_{mj} + \sum_{k \in F \neq R} w_{mk} = 1$$

$$i_{-Rt}^{h} = \sum_{F \neq R} w_{mF} i_{Ft}^{h}$$

$$\sum_{F \neq R} w_{mF} = 1$$
(1)

• How to estimate (1)? Write (1) in matrix form:

$$\mathbf{i} = \rho \mathbf{W} \mathbf{i} + \phi \mathbf{i}_R + \delta \mathbf{W} \mathbf{i}_R + \boldsymbol{\psi} \tag{2}$$

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ullet Invert the equation and estimate by maximum likelihood if willing to make hypotheses on ψ :

$$\mathbf{i} = (\mathbf{I} - \rho \mathbf{W})^{-1} (\phi + \delta \mathbf{W}) \mathbf{i}_R + (\mathbf{I} - \rho \mathbf{W})^{-1} \psi$$
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21 / 29

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<u>Instrumental variable</u>: exogenous own determinant of top marginal tax rates in a locality (some variable in matrix X below) that has no direct effect on tax rates in nearby localities - WX does not appear in (4) - but only an indirect effect through tax policy:

$$\mathbf{i} = \rho \mathbf{W} \mathbf{i} + \phi \mathbf{i}_{\mathbf{R}} + \delta \mathbf{W} \mathbf{i}_{\mathbf{R}} + \mathbf{X} \boldsymbol{\beta} + \boldsymbol{\psi} \tag{4}$$

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 Alternatively, use lags of i as instruments; or estimate a lagged reaction function:

$$i_{m(R)t}^{h} = \rho i_{-m(R)t-1}^{h} + \phi i_{Rt}^{h} + \delta i_{-Rt}^{h} + \psi_{m(R)t}$$
 (5)

May 2019

 Border discontinuity design: focus on municipalities located on a regional border, that have at least one neighbor municipality that is located on the other side of the border, in a different region (Swiss Canton).

- Border discontinuity design: focus on municipalities located on a regional border, that have at least one neighbor municipality that is located on the other side of the border, in a different region (Swiss Canton).
- Reaction function of municipality (m(R)) relative to a weighted average of *consolidated* (municipal+cantonal) marginal tax rates of *all* neighboring municipalities:

$$i_{m(R)t}^{h} = \rho \tilde{i}_{-m(R)t}^{h} + \psi_{m(R)t}$$

$$\tilde{i}_{-m(R)t}^{h} = \left[\sum_{j \in R} w_{mj} \left(i_{j(R)t}^{h} + i_{Rt}^{h} \right) + \sum_{k \in F} w_{mk} \left(i_{k(F)t}^{h} + i_{Ft}^{h} \right) \right]$$

$$\sum_{j \in R} w_{mj} + \sum_{k \in F \neq R} w_{mk} = 1$$
(6)

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• (6) is a restricted (non-nested) version of (1).

- (6) is a restricted (non-nested) version of (1).
- Instrumental variable: top marginal tax rate of neighboring region (i_{Ft}^h) , weighted by the share of adjacent municipalities that are located in the neighboring region

$$z_{m(R)t} = \sum_{k \in F} w_{mk} i_{Ft}^h = \frac{N_{mF}}{N_m} i_{Ft}^h$$

5. Estimation results: tax base response

$$\ln \left(y_{m(R)t}^h \right) = \lambda \ln \left(k_{m(R)t}^h \right) + \ln \left(\mathbf{x}_{m(R)t} \right)' \gamma + \varepsilon_{m(R)t}$$

	$\varepsilon_{m(R)t} = \ell_{n}$	$u_{m(R)} + \iota_t + u_{m(R)t}$	$\varepsilon_{m(R)t} = \ell$	$u_{m(R)} + s_{Rt} + u_{m(R)t}$
ı.h	0.032		0.958	
$k_{m(R)t}^h$	(0.306)		(0.826)	
ı.h		0.842***		0.984
$k_{m(R)t-1}^{h}$		(0.326)		(0.817)
obs.	54,542	51,318	54,542	51,318

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Horizontal, vertical, and diagonal fiscal externalities

$$i_{m(R)t}^{h} = \rho \underbrace{i_{-m(R)t}^{h}}_{\text{horizontal}} + \phi \underbrace{i_{Rt}^{h}}_{\text{vertical}} + \delta \underbrace{i_{-Rt}^{h}}_{\text{diagonal}} + \psi_{m(R)t}$$

	$\psi_{m(R)t} = \ell_m$	$(R) + \iota_t + u_{m(R)t}$	$\psi_{m(R)t} = \ell_m$	$(R) + s_{Rt} + u_{m(R)t}$
	all	border	all	border
ρ	0.519***	0.496***	0.351***	0.353***
	(0.012)	(0.039)	(0.015)	(0.042)
4	0.001	0.006		
φ	(0.002)	(0.005)		
δ	-0.003	0.005	-0.010*	-0.003
0	(0.005)	(0.006)	(0.005)	(0.002)
obs.	110,782	14,294	110,782	14,294

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Lagged specification

$$i_{m(R)t}^{h} = \rho i_{-m(R)t-1}^{h} + \phi i_{Rt}^{h} + \delta i_{-Rt}^{h} + \psi_{m(R)t}$$

	$\psi_{m(R)t} = \ell_m$	$(R) + \iota_t + u_{m(R)t}$	$\psi_{m(R)t} = \ell_{m(R)t}$	$(R) + s_{Rt} + u_{m(R)t}$
	all	border	all	border
ρ	0.477***	0.459***	0.317***	0.331***
	(0.012)	(0.037)	(0.014)	(0.040)
4	0.002	0.009		
φ	(0.002)	(0.006)		
δ	-0.002	0.009	-0.010*	-0.002
	(0.005)	(0.006)	(0.005)	(800.0)
obs.	110,782	14,294	110,782	14,294

BDD (Parchet, 2019)

$$i_{m(R)t}^{h} = \rho \tilde{i}_{-m(R)t}^{h} + \psi_{m(R)t}$$
 (7)

	$\psi_{m(R)t} = \ell_{m(R)} + \iota_t + u_{m(R)t}$			
	IV	first stage	IV	first stage
~;h	-0.331***		-0.246***	
$\widetilde{i}^h_{-m(R)t}$	(0.066)		(0.060)	
:h		0.282***		
i_{Ft}^h		(0.014)		
$\frac{N_{mF}}{N_m}i_{Ft}^h$				0.731***
				(0.028)
obs.	14,294			

BDD (Parchet, 2019)

$$i_{m(R)t}^{h} = \rho \tilde{i}_{-m(R)t}^{h} + \psi_{m(R)t}$$
 (8)

	$\psi_{m(R)t} = \ell_{m(R)} + s_{Rt} + u_{m(R)t}$			
	IV	first stage	IV	first stage
$\widetilde{i}_{-m(R)t}^{h}$	-0.006		-0.019	
	(0.020)		(0.022)	
i ^h Ft		0.349***		
		(0.013)		
$\frac{N_{mF}}{N_m}i_{Ft}^h$				0.799***
				(0.023)
obs.	14,294			

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- estimating the response of the income tax base to local tax differentials in a fragmented structure where local tax rates show strong positive spatial auto-correlation is an important and mostly unresolved issue
- border-discontinuity instrumental variable estimators that use cross-border upper-tier tax policies as instruments for lower-tier spatial lags generate results that crucially depend on unwarranted restrictions on the parameters of the fiscal reaction function