Behavioral responses to inheritance tax: Evidence from notches in France

Jonathan Goupille and Arturo Infante

12 février 2015

Motivation

Wealth is strongly concentrated Wealth can be transmitted from generation to generation

Estate tax : Trade-off between equity and efficiency

Equity :

- · Limit the perpetuation of inequality
- · Limit corporate power on the political process

Efficiency cost due to behavioral responses :

- Real responses harmful to the macroeconomic success of an economy (incentives for entrepreneurship, savings, labor supply)
- Shifting responses reduce efficiency of taxation to curb wealth inequality

Why do behavioral responses matter?

- Behavioral responses...
 - · Increase the efficiency cost of taxation
 - · Limit the redistributive ability of governments
- Nature of behavioral responses yields different policy implications : Saez et al. (2012)
 - · Real responses limit optimal top tax rate
 - · Shifting responses are a symptom of a poorly design tax system
- Very scarce empirical research on the effect of inheritance taxation on wealth accumulation
 - Kopczuk (2012), Holtz-Eakin and Marples (2001), Kopczuk and Slemrod (2000), Joulfaian (2006)
 - Lack of good micro data
 - Issue about how to identify the causal effect of taxation on wealth accumulation

This paper

Research Question :

Estimation and implications of behavioral responses to inheritance tax

- · Use the Preferential Tax Scheme for life insurance in France
 - · Generate large discontinuities in tax liability depending on :
 - · Life insurance policy start date (before and after November 20, 1991)
 - Age at which the premiums was paid (before or after 70 years old)
- · Estimate different behavioral responses to estate taxation over time
 - Timing responses using bunching estimation
 - · Aggregate of real and shifting responses using diff-in-diff method

Appendix

The Preferential tax scheme for life insurance

- · Introduced in 1965; entirely exempt life insurance from inheritance tax
- Reform of 1992 not retroactive
 - For life insurance policy taken out after 11/20/1991 : recall life insurance premiums paid after age 70 in the inheritance tax base
- Reform of 1998
 - All life insurance premiums not recalled in the inheritance tax base are taxed at a flat rate of 20% after an exemption of 152,500 \in by inheritor
- · Generate large discontinuities in tax liability depending on :
 - Life insurance policy start date (before and after November 20, 1991)
 - Age at which the premiums was paid (before or after 70 years old)

Appendix

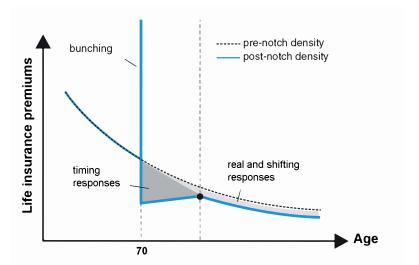
The Preferential tax scheme for life insurance

TABLE 1: Life insurance taxation at death since 1998

| | Insurance premiums paid Before aged 70 After aged 70 | | |
|--------------------------|---|--|--|
| Life insurance taken out | | | |
| Before 11/20/1991 | Flat tax rate of 20% | | |
| After 11/20/1991 | Flat tax rate of 20% Recalled the inherit tax bas | | |

Note : Top inheritance tax rate goes up to 40% for spouses and direct descendants and 60% for collateral heirs.

FIGURE 1: Behavioral responses to the reform of the preferential tax scheme



- · Reform of the preferential tax scheme should induce :
 - · Re-timing responses at age 70
 - Shifting among asset portfolio
 - · Wealth dis-accumulation
- · Source of variations and estimation methods :
 - · Bunching estimation for timing responses
 - Difference in taxation at age 70 (for life insurance policies taken out after 11/20/1991)
 - Diff-in-diff estimation for aggregate real and shifting responses
 - Comparison of life insurance premiums paid before or after age 70 for life insurance policy taken out before or after 11/20/1991

Contributions :

- 1 Estimate different behavioral responses to estate taxation over time
 - · Timing responses in short and medium run :
 - Important short-term timing responses reflect moderate inter-temporal shifting in the medium term
 - · Aggregate elasticity of real and shifting responses
 - Medium-term elasticity = 0.35
 - Long-term elasticity = 0.24
- 2 Implications on wealth accumulation and bequest motives :
 - Evidence that individuals fail to plan for the disposition of an estate well in advance
 - · Evidence of "Wealth loving" motive
- Oevelop an inter-temporal model of transfer taxation to rationalize findings 1 to 2
- Optimal inheritance tax rate from estimated elasticity

Outline

Macro-series and Data

Macro-series Data

Empirical approach

Timing responses due to the notch Medium and long term responses to inheritance tax

Theoretical framework

Optimal inheritance tax rate

Appendix

| Macro-series and Data ●O ○○ | Empirical approach | Optimal inheritance tax rate | |
|-----------------------------------|--------------------|------------------------------|--|
| Macro-series | | | |

TABLE 2: Life insurance and wealth in France, 1984-2013

| Year | Private Wealth | Wealth c | Wealth composition (in % of private wealth) | | | |
|------|---------------------------------|--------------------------------|---|--------------------------------------|-----|--|
| real | (in % of national income) | of nal Tangible Liabilities | | Financial inc. life assets assets | | assets (in % of financial assets) |
| 1985 | 304% | 74% | -9% | 35% | 3% | 8% |
| 1995 | 330% | 67% | -14% | 47% | 10% | 21% |
| 2005 | 466% | 70% | -11% | 41% | 14% | 34% |
| 2013 | 597% | 73% | -13% | 40% | 15% | 38% |

Sources : National Accounts from INSEE (France's National Institute of Statistics)

| Macro-series and Data | Empirical approach | Optimal inheritance tax rate | Appendix |
|-----------------------|---------------------------|------------------------------|----------|
| 00 00 | 0000000000000 00000000 | | |
| Macro-series | | | |

TABLE 3: Life insurance transmitted at death, 1984-2006

| | Wealth at death | | | Wealth of the living | | |
|------|------------------------|--------------------------|---|--------------------------|--------------------------|---|
| Year | (1) Bequest flow | (2) Life insurance | (3) Life insurance (in % of (1)) | (4) Private wealth | (5) Life insurance | (6) Life insurance (in % of (4)) |
| 1984 | 33,1 | 3,4 | 10% | 3 512 | 94 | 3% |
| 1987 | 35,4 | 4,5 | 13% | 3 859 | 136 | 4% |
| 1994 | 43,2 | 7,4 | 17% | 4 584 | 386 | 8% |
| 2000 | 59,2 | 12,5 | 21% | 5 782 | 835 | 14% |
| 2006 | 86,2 | 20,2 | 23% | 8 962 | 1 198 | 13% |

Sources : FFSA (French life insurance association), MTG surveys from DGFiP and National Accounts from INSEE.

All the aggregate flows are in billion 2013 euros.

Data

- French longitudinal data set from Axa (2003-2013)
 - · Detailed information about life insurance policy
- Two types of insured
 - · Insured taken out a standard life insurance policy (classical insured)
 - Wealthy insured that entrust Axa the management of their wealth (wealthy insured)

Data

- Three motives for life insurance
 - Cash reserve
 - 2 Supplemental retirement benefit
 - 3 Transmission at death
 - · Only 3 is affected by the preferential scheme
- · Conditions of inclusion in the data set
 - · Aged between 60 and 80 years old
 - · Having not terminated the life policy during lifetime
- Huge database : 350 000 individuals \times 23 quarterly years = 8 millions of observations
- Bunching sample Diff and diff sample

Macro-series and Data

Empirical approach

Theoretical framework

Optimal inheritance tax rate

Appendix

Outline

Macro-series and Data Macro-series Data

Empirical approach

Timing responses due to the notch Medium and long term responses to inheritance tax

Theoretical framework

Optimal inheritance tax rate

Appendix

| | Empirical approach | | Optimal inheritance tax rate | Appendix |
|-----------------------------------|--|--|------------------------------|----------|
| 00 00 | •••••••••••••••••••••••••••••••••••••• | | | |
| Timing responses due to the notch | | | | |

- · Reform of the preferential tax scheme should induce :
 - Re-timing responses at age 70
 - · Shifting among asset portfolio
 - Wealth dis-accumulation
- · Source of variations and estimation methods :
 - Bunching estimation for timing responses
 - Difference in taxation at age 70 (for life insurance policies taken out after 11/20/1991)
 - Diff-in-diff estimation for aggregate real and shifting responses
 - Comparison of life insurance premiums paid before or after age 70 for life insurance policy taken out before or after 11/20/1991

Appendix

Timing responses due to the notch

The Preferential tax scheme for life insurance

TABLE 4: Life insurance taxation at death since 1998

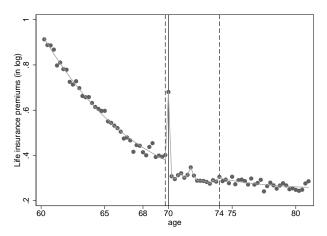
| | Insurance premiums paid Before aged 70 After aged 70 | | |
|--------------------------|---|--|--|
| Life insurance taken out | | | |
| Before 11/20/1991 | Flat tax rate of 20% | | |
| After 11/20/1991 | Flat tax rate of 20% | Recalled into the inheritance tax base | |

Note : Top inheritance tax rate goes up to 40% for spouses and direct descendants and 60% for collateral heirs.

Timing responses due to the notch

- Timing responses using bunching estimation
 - Increase in taxation at age 70
 - Formation of a notch around age 70
 - Identification assumption : Distribution of life insurance premiums would have been smooth if there were no jump in the tax rate at age 70
 - \Rightarrow No other factors can explain bunching at age 70

FIGURE 2: Life insurance premiums around the notch, (France 2003-2013)



Sample : Life insurance with portfolio manager (taken out after 11/20/1991)

Timing responses due to the notch

Estimating the empirical distribution

• Fit a flexible polynomial to the empirical distribution, excluding data in a range around the notch

$$\log y_a = \sum_{j=0}^{J} \beta_j \cdot (age_a)^j + \sum_{k=a_l}^{a_u} \gamma_k \cdot \mathbb{1}_{age_a=k} + \varepsilon_a$$

where log y_a is the log of life insurance premiums paid by individuals of age a, *J* is the order of polynomial, *age* is the age normalized to be equal to 0 at the cutoff, $[a_l, a_u]$ is the excluded range around the notch point, 1 is the indicator function and ε_a is the error term

Estimating the counterfactual distribution, Bunching and Holes

· Estimate of counterfactual distribution :

$$\log y_a^c = \sum_{j=0}^J \hat{\beta}_j \cdot (age_a)^j \tag{1}$$

Estimates of excess bunching and hole (missing mass) :

$$\hat{b} = \frac{\sum_{a=a_l}^{\hat{a}} \log y_a - \log y_a^c}{\log y_a^c}$$
$$\hat{m} = \frac{\sum_{a=\hat{a}}^{a_u} \log y_a^c - \log y_a}{\log y_a^c}$$



FIGURE 3: Life insurance premiums around the notch, (France 2003-2013)

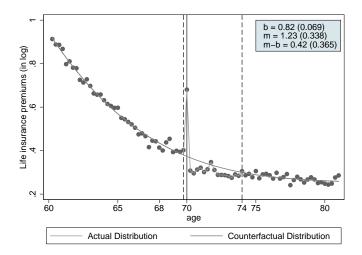
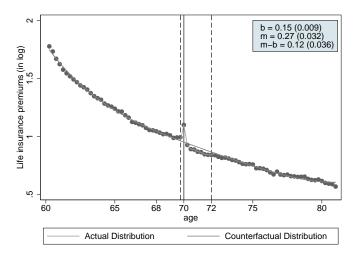




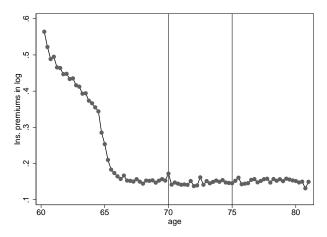
FIGURE 4: Life insurance premiums around the notch, (France 2003-2013)



Sample : Standard life insurance policies (taken out after 11/20/1991)



FIGURE 5: Robustness Check : Life insurance taken out before 11/20/1991



Source : Life insurance policy from Axa, France 2003-2013

Timing responses due to the notch

Estimating timing responses

$$\log y_a = \sum_{j=0}^{J} \beta_j \cdot (age_a)^j + \gamma_1 \cdot \mathbb{1}_{a_j \leq age_a \leq \bar{a}} + \gamma_2 \cdot \mathbb{1}_{\bar{a} < age_a \leq a_v} + \varepsilon_a$$
(2)

- 1_{a_i≤age_a≤ā} and 1_{ā<age_a≤a_u} are respectively age dummies for being in the excluding range below or above the notch.
- γ_1 : short-term timing responses
- γ₂ medium-term timing responses

Timing responses due to the notch

TABLE 5: Absolute value of timing responses and reduced-form elasticity estimates

| | Timing responses | | Reduced- | form elasticity | Horizon of |
|-----------------|--------------------|--------------------|--------------------|--------------------|------------|
| | short | medium | short | medium | timing |
| | term | term | term | term | responses |
| Standard | 0.15*** | 0.03*** | 0.51*** | 0.11*** | 2 years |
| insured | (0.008) | (0.004) | (0.028) | (0.013) | |
| Wealthy insured | 0.31*** (0.023) | 0.03*** (0.008) | 1.07*** (0.081) | 0.10*** (0.029) | 4 years |

* p < 0.1, ** p < 0.05, *** p < 0.01. Bootstrap standard errors in parentheses. The reduced-form elasticities are computed by dividing timing responses by log(1 - 0.4) - log(1 - 0.2) and the standard errors associated are derived by the delta method.

TABLE 6: Absolute value of timing responses and reduced-form elasticity estimates for insured with life insurance between $100,000 \in$ and $700,000 \in$

| | Timing responses | | Reduced- | Reduced-form elasticity | |
|----------|------------------|----------|----------|-------------------------|-----------|
| | short | medium | short | medium | timing |
| | term | term | term | term | responses |
| Standard | 0.36*** | 0.035*** | 1.24*** | 0.12*** | 4 years |
| insured | (0.03) | (0.012) | (0.10) | (0.041) | |
| Wealthy | 0.37*** | 0.049*** | 1.29*** | 0.17*** | 4 years |
| insured | (0.046) | (0.015) | (0.16) | (0.052) | |

* p < 0.1, ** p < 0.05, *** p < 0.01. Bootstrap standard errors in parentheses. The reduced-form elasticities are computed by dividing timing responses by log(1 - 0.4) - log(1 - 0.2) and the standard errors associated are derived by the delta method.

Timing responses due to the notch

Results on timing response estimation :

- · Strong short-term inter-temporal shifting elasticity
 - · varying with level of wealth
- · Moderate medium-term inter-temporal shifting elasticity around 0.1
- Difference among short-term elasticities is explained by the difference in time horizon

| | Empirical approach | | Optimal inheritance tax rate | Appendix |
|---|--|--|------------------------------|----------|
| 00 00 | 00000000000000000000000000000000000000 | | | |
| Medium and long term responses to inheritance tax | | | | |

- · Life insurance taxation can also generate :
 - · Shifting among asset portfolio
 - Wealth dis-accumulation
- Empirical Strategy : Difference-in-differences
 - · Life insurance tax change implemented in 1992 is not retroactive
 - No tax change at age 70 for life insurance policy taken out before 11/20/1991 (control group)
 - Tax change at age 70 for life insurance policy taken out after 11/20/1991 (treated group)
- Comparability issue
 - · Life insurance premiums observed only during 2003-2013
 - Sample restricted to life insurance policies taken out \pm 2 years around 11/20/1991

Appendix

Medium and long term responses to inheritance tax

The Preferential tax scheme for life insurance

TABLE 7: Life insurance taxation at death since 1998

| | Insurance premiums paid Before aged 70 After aged 70 | | |
|--------------------------|---|--|--|
| Life insurance taken out | | | |
| Before 11/20/1991 | Flat tax rate of 20% | | |
| After 11/20/1991 | Flat tax rate of 20% Recalled the inherit tax bas | | |

Note : Top inheritance tax rate goes up to 40% for spouses and direct descendants and 60% for collateral heirs.

Potential selection problem :

- · Sample includes only life insurance policies :
 - a) not terminated before 2003
 - b) not terminated during lifetime between 2003 and 2013
 - Reform should not play on a) and b) because of the existence of a supplemental tax exemption for life insurance
- individuals could anticipate the reform by subscribing life insurance policy just before its implementation
 - the 1992 law was applied to life insurance policies taken out after 20/11/1991, i.e 40 days before the law was voted

Selection bias



FIGURE 6: Life insurance premiums by age of the owners, France 2003-2013

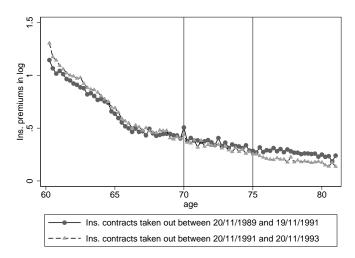
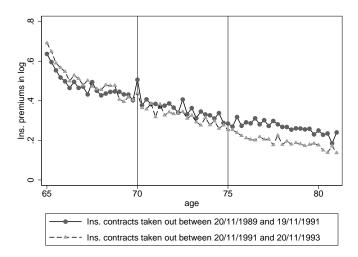






FIGURE 7: Life insurance premiums by age of the owners, France 2003-2013





Medium and long term responses to inheritance tax

Diff-in-Diff estimation

 $\log y_{iat} = \delta \cdot \text{Diff}_{ia} + \alpha_i + \gamma_a + \nu_t + \varepsilon_{iat}$ (3) $\log y_{iat} = \delta_1 \cdot \text{Diff1}_{ia} + \delta_2 \cdot \text{Diff2}_{ia} + \alpha_i + \gamma_a + \nu_t + \varepsilon_{iat}$ (4)

- log y_{iat} = log of life insurance premiums paid by individual i of age a at time t
- α_i , γ_a and ν_t are respectively individual, age and time fixed effects
- Diff; a : being in the treatment group and aged more than 70 years old
- Diff1_{ia} being in the treatment group and aged between 70 and 75 years old
- Diff2_{ia} : being in the treatment group and aged between 75 and 80 years old

| | Empirical approach | | Optimal inheritance tax rate | Appendix |
|----------------------------|--|--|------------------------------|----------|
| 00 00 | 00000000000000000000000000000000000000 | | | |
| Medium and long term respo | nses to inheritance tax | | | |

 TABLE 8: Panel estimates of the effect of inheritance tax change on life insurance

 premiums in France, 2003-2013

| | (1) | (2) | (3) |
|--|-----------------------------|-------------------|-----------|
| | Treatment : Aged 70 or more | | |
| | Average effect | Between 70 and 75 | After 75 |
| Reduced-form estimate | -0.073*** | -0.068*** | -0.100*** |
| | (0.020) | (0.020) | (0.024) |
| Elasticity $\frac{d \log y}{d \log 1 - \tau}$ estimate | 0.254*** | 0.236*** | 0.346*** |
| | (0.069) | (0.069) | (0.084) |
| Number of observations | 673128 | 673128 | 673128 |
| Number of individuals | 25858 | 25858 | 25858 |

* p < 0.1, ** p < 0.05, *** p < 0.01. The standard errors in parentheses are clustered at the individual level. The reduced-form elasticities are computed by dividing timing responses by log(1 - 0.4) - log(1 - 0.2) and the standard errors associated are derived by the delta method Medium and long term responses to inheritance tax

Robustness checks

- Varying the window width for sample selection :
 Probustness 1
- · Falsification experiments :
 - Both groups not affected by the tax change :
 Probustness 2
 - · Both groups affected by the tax change :
 - Robustness 3

Findings

- · Aggregate elasticity of real and shifting responses
 - Medium-term elasticity = 0.35
 - Long-term elasticity = 0.24
- · Implications on wealth accumulation and bequest motives :
 - Increasing effect of inheritance taxation with respect to age : Evidence that individuals fail to plan for the disposition of an estate well in advance
 - Timing responses less important than aggregate shifting and real responses
 Evidence of "Wealth loving" motive

Outline

Macro-series and Data

Macro-series Data

Empirical approach

Timing responses due to the notch Medium and long term responses to inheritance tax

Theoretical framework

Optimal inheritance tax rate

Appendix

Novelty of the model

- Introduction of two assets in an inter-temporal framework
- Life insurance does not yield utility during lifetime but tangible assets do
 - · Housing or Business ownership may yield power or social status.
 - Utility of wealth per se (secondary residence next to the sea, family house)
- Trade-off between life insurance and tangible assets
 - · Life insurance benefits from preferential inheritance taxation
 - · tangible assets yield utility during lifetime and at death

Set up

- · Three periods
 - · Period 1 : individuals aged between 20 and 70 years old
 - · Period 2 : individuals aged between 70 and 80 years old
 - · Period 3 : individuals die at age 80 and leave a bequest
- For each period during lifetime, individuals choose between
 - Consuming C_t
 - Accumulating life insurance X_t for bequest purpose
 - · Saving to increase their tangible asset holdings

• During lifetime, individuals derive utility from consumption and tangible asset holdings but not from life insurance accumulation

$$U(C_t, W_t) = u(C_t) + v(W_t) = \frac{c_t^{1-s_c}}{1-s_c} + \frac{W_t^{1-s_w}}{1-s_w}$$
(5)

• At death, individuals derive utility from bequeathing total life insurance accumulation and end-of-life wealth

$$\phi(B) = \phi(W_2, X_1, X_2) = \frac{\left(R_x^2(1-\tau_1)X_1 + R_x(1-\tau_2)X_2 + R_w \cdot (1-\tau_w) \cdot W_2\right)^{1-s_b}}{1-s_b}$$
(6)

Decision Problem

$$V(W_{t}, C_{t}, X_{t}) = \max(\sum_{t=1}^{2} \beta^{t-1} \cdot U(C_{t}, W_{t}) + \beta^{2} \phi(B))$$
subject to
$$W_{t} = R_{w} \cdot W_{t-1} + Y_{t} - C_{t} - X_{t}$$

$$B = R_{x}^{2}(1 - \tau_{1})X_{1} + R_{x}(1 - \tau_{2})X_{2} + R_{w} \cdot (1 - \tau_{w}) \cdot W_{2}$$

$$R_{x} > R_{w}, \tau_{1} < \tau_{2} < \tau_{w}$$
(7)

Impact of the reform of the preferential tax scheme?

When τ_2 increase then X_2 decreases and is substituted by

- C₁ and C₂ (real responses)
- W_1 and W_2 (Shifting among asset portfolio responses)
- X₁ (timing responses)

Retiming responses

$$\frac{\partial v}{\partial W_1} = \beta^2 [R_x^2(1-\tau_1) - R_x R_w(1-\tau_2)] \frac{\partial \phi}{\partial B}$$

Shifting among asset portfolio

$$\frac{\partial \mathbf{v}}{\partial W_2} = \beta \left(R_x (1 - \tau_2) - R_w (1 - \tau_w) \right) \frac{\partial \phi}{\partial B}$$

Increase of the consumption

$$\frac{\partial u}{\partial C_2} = \beta R_x (1 - \tau_2) \frac{\partial \phi}{\partial B}$$

Outline

Macro-series and Data

Macro-series Data

Empirical approach

Timing responses due to the notch Medium and long term responses to inheritance tax

Theoretical framework

Optimal inheritance tax rate

Appendix

Policy implications

- Optimal inheritance tax design
 - Tax-neutrality across assets
 - Broadening the tax base
- Life insurance reform
 - · Improve partially the inheritance tax design
 - · But introduce new avoidance opportunities through timing responses
- · Optimal inheritance tax in absence of the preferential tax scheme?

| Macro-series and Data OO OO | Empirical approach 0000000000000 000000000 | Optimal inheritance tax rate | |
|-----------------------------------|--|------------------------------|--|
| | | | |

- The government want to maximise social welfare of a particular group
- Sufficient statistic formula for optimal inheritance tax rate (Piketty and Saez (2013))

$$\tau_{B} = \frac{1 - \left[1 - \frac{e_{L}\tau_{L}}{1 - \tau_{L}}\right] \left[\frac{\bar{b}^{\text{received}}}{\bar{y}_{L}}(1 + \hat{e}_{B}) + \frac{\nu}{R/G}\frac{\bar{b}^{\text{left}}}{\bar{y}_{L}}\right]}{1 + \hat{e}_{B} - \left[1 - \frac{e_{L}\tau_{L}}{1 - \tau_{L}}\frac{\bar{b}^{\text{received}}}{\bar{y}_{L}}(1 + \hat{e}_{B})\right]}$$
(8)

- $b^{\text{left}}, \bar{b}^{\text{received}}$ and \bar{y}_L are respectively the ratios of bequest left, bequest received and earnings of the sub-group targeted by the government to population averages.
- *e_B* and *e_L* are respectively the elasticities of aggregate taxable bequests and taxable income.
- $R/G = e^{(r-g)H}$ with r the return on capital and g the growth rate.
- ν is the parameter for pure bequest motive.

TABLE VII – OPTIMAL INHERITANCE TAX RATE CALIBRATIONS

| | Optimal Tax Rate (by Percentile of Bequest Received) | | | | | | | | | |
|---------------------------------|--|------------|----------|--------------|--------------|-----------|--------|----------|-------|---------------|
| | | | France | | | | | U.S. | | |
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| Fraction of the Bequest Elastic | city due | to Real I | Response | s | | - | | | - | |
| - | 100% | 75% | 50% | 25% | 0% | 100% | 75% | 50% | 25% | 0% |
| Real Elasticity | | | | | | | | | | |
| - | 0,25 | 0,19 | $0,\!13$ | 0,06 | 0,00 | 0,25 | 0,19 | $0,\!13$ | 0,06 | 0,00 |
| 1. Optimal Linear Tax Rate by | y Percen | tile of Be | quest Re | ceived | | | | | | |
| Meritocratic Rawlsian Case : l | P0-50 | | | | | | | | | |
| | 61% | 64% | 67% | 71% | 76% | 56% | 59% | 63% | 66% | 70% |
| Median Voter Case : P40-60 | FOR | 0007 | 0.007 | H 007 | ₩ 407 | F 007 | 5007 | 0007 | 0.007 | H 1 07 |
| Pro-Capitalist Case : P90-95 | 59% | 63% | 66% | 70% | 74% | 56% | 59% | 63% | 66% | 71% |
| rro-Capitalist Case . r 90-95 | -340% | -328% | -315% | -300% | -284% | -93% | -82% | -70% | -57% | -43% |
| 2. Optimal Top Tax Rate Abo | ve Posit | ive Exem | ption An | nount for | Zero Re | ceivers (| bottom | 50%) | | |
| Above 500,000 | 61% | 66% | 72% | 79% | 88% | 55% | 58% | 62% | 67% | 73% |
| Above 1,000,000 | 61% | 67% | 74% | 82% | 92% | 54% | 58% | 62% | 67% | 73% |

| | Empirical approach | Optimal inheritance tax rate | Appendix |
|----------|--------------------------|------------------------------|----------|
| 00 00 | 000000000000 00000000 | | |
| | | | |
| | | | |

- Optimal tax rate in Meritocratic Rawlsian case and Median Voter case :
 - in France : 60%-70%
 - in the USA : 55%-65%
 - When elasticity is due entirely to real responses : $\tau_B = 60\%$
- Bottom 50% receivers and Median voter
 - · leave substantially less wealth than average to their heirs
 - have earnings close to average
- Optimal policy is to increase inheritance tax rate and reduce labor tax rate
- In the Pro-capistalistic case, inheritance should be subsidized

Conclusion

- · First comprehensive study of behavioral responses to inheritance tax
- We have benefited from :
 - · First-time access to longitudinal data set of life insurance policies
 - Compelling variation created by the French preferential tax scheme for life insurance transmitted at death
- · Estimation of two kinds of behavioral responses
 - Timing responses using bunching estimation : Strong short-term timing responses reflect moderate inter-temporal shifting in the medium term
 - Aggregate real and shifting among asset portfolio responses : Medium-term elasticity = 0.35 Long-term elasticity = 0.24

Conclusion

- · Motivations behind bequest motives :
 - Increasing effect of inheritance taxation with respect to age : Evidence that individuals fail to plan for the disposition of an estate well in advance
 - Timing responses less important than aggregate shifting and real responses
 Evidence of "Wealth loving" motive
- · Policy implications :
 - Optimal tax rate might be as large as 60%–70% in the median voter or meritocatric rawlsian case
 - Inheritance should be subsidized in the Pro-capitalistic case

Outline

Macro-series and Data

Macro-series Data

Empirical approach

Timing responses due to the notch Medium and long term responses to inheritance tax

Theoretical framework

Optimal inheritance tax rate

Appendix

| 00 | | |
|----|--|--|
| 00 | | |

mpirical approach

Theoretical framework

Optimal inheritance tax rate

Appendix

BACK UP SLIDES

Appendix

The Preferential tax scheme for life insurance

TABLE 9: Life insurance taxation at death since 1998

| | Insurance pro Before aged 70 | |
|--------------------------|---------------------------------|--|
| Life insurance taken out | | |
| Before 11/20/1991 | Flat tax ra | te of 20% |
| After 11/20/1991 | Flat tax rate of 20% | Recalled into the inheritance tax base |

Note : Top inheritance tax rate goes up to 40% for spouses and direct descendants and 60% for collateral heirs.

Return bunching PReturn Diff-in-Diff

| Panel A : Life insuran | ce policies take | en out after $20/11$ | /1991 |
|--|---------------------------------|----------------------|---------------------|
| | All life insurance owners | Wealthy insured | Standard insured |
| Age | 68.5 (5.88) | 69.5 (6.04) | 68.4 (5.85) |
| Life insurance policy (in '000s of 20 | 013 euros) | | |
| mean | 60.2 | 192.7 | 41.7 |
| p50 | 14.5 | 54.7 | 11.5 |
| p99 | 611.2 | 2,002.5 | 419.1 |
| P99-100 Life insurance premiums (in '000s o | 1,757.7 of 2013 euros) | 6,473.7 | 829.8 |
| mean p99 | 1.2 20.1 | $3.0 \\ 41.8$ | $0.9 \\ 17.8$ |
| Number of observations | 7,826,454 | 958,265 | 6,868,189 |
| Number of individuals | 347,253 | 41,074 | 306,179 |
| Average number of spells | 22.5 | 23.3 | 22.4 |
| Duration of the contract (in years) | 12.4 | 13.5 | 12.3 |

| Panel A : Li | ife insurance | policies t | aken ou | t after 2 | 0/11 | /1991 |
|--------------|---------------|------------|---------|-----------|------|-------|
|--------------|---------------|------------|---------|-----------|------|-------|

| | All | aken out | |
|---------------------------------------|-----------|-------------------|-----------------|
| | | before 20/11/1991 | after 20/11/199 |
| Age | 70.2 | 70.1 | 70.2 |
| | (6.25) | (6.24) | (6.27) |
| Life insurance policy (in '000s of 20 | 13 euros) | | |
| mean | 89.5 | 73.5 | 106.4 |
| p50 | 26.3 | 23.5 | 29.5 |
| p99 | 822.3 | 719.1 | 967.7 |
| P99-100 | 2,970.7 | 1,987.6 | 3,978.3 |
| Life insurance premiums (in '000s o | | / | |
| mean | 0.6 | 0.6 | 0.6 |
| p99 | 2.9 | 2.5 | 3.2 |
| Number of observations | 747,307 | 383,153 | $364,\!154$ |
| Number of individuals | 31,073 | 15,514 | 15,559 |
| Average number of spells | 24.1 | 24.7 | 23.4 |
| Duration of the contract (in years) | 21.9 | 23.0 | 20.8 |

| Panel B. Life insurance policies taken out between | n 20/11/1989 and 20/11/1993 |
|--|-----------------------------|
|--|-----------------------------|

| 00 | | |
|----|--|--|
| 00 | | |

mpirical approach

Theoretical framework

Optimal inheritance tax rate

Appendix



Estimating the empirical distribution

• Fit a flexible polynomial to the empirical distribution, excluding data in a range around the notch

$$\log y_a = \sum_{j=0}^J \beta_j \cdot (a)^j + \sum_{k=a_l}^{a_u} \gamma_k \cdot \mathbb{1}_{a=k} + \varepsilon_a$$

where log y_a is the log of life insurance premiums paid by individuals of age a, *J* is the order of polynomial, *a* is the age normalized to be equal to 0 at the cutoff, $[a_l, a_u]$ is the excluded range around the notch point, 1 is the indicator function and ε_a is the error term Empirical approach

Theoretical framework

Appendix

Estimating the counterfactual distribution, Bunching and Holes

· Estimate of counterfactual distribution :

$$\log y_a^c = \sum_{j=0}^J \hat{\beta}_j \cdot (a)^j \tag{9}$$

Estimates of excess bunching and hole (missing mass) :

$$\hat{b} = \frac{\sum_{a=a_l}^{\hat{a}} \log y_a - \log y_a^c}{\log y_a^c}$$
$$\hat{m} = \frac{\sum_{a=\hat{a}}^{a_u} \log y_a^c - \log y_a}{\log y_a^c}$$



FIGURE 8: Falsification experiment with both groups affected by the tax change

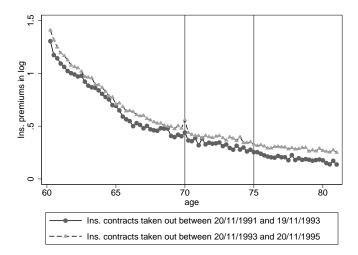






FIGURE 9: Falsification experiment with both groups affected by the tax change

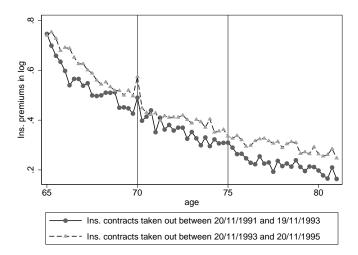




FIGURE 10: Falsification experiment with both groups unaffected by the tax change

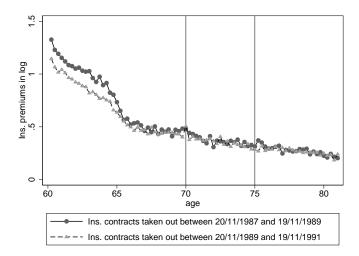




FIGURE 11: Falsification experiment with both groups unaffected by the tax change

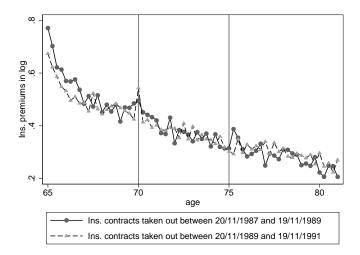




FIGURE 12: Other distributions from life insurance taken out before 11/20/1991

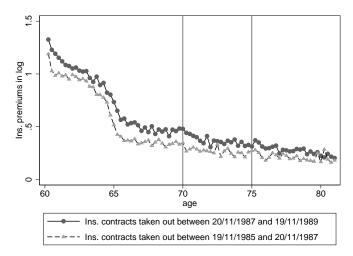






FIGURE 13: Number of life insurance policies by year of subscription

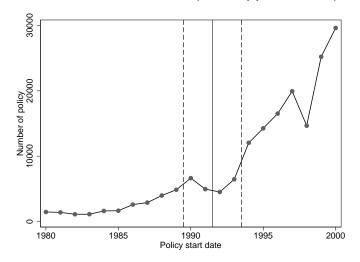
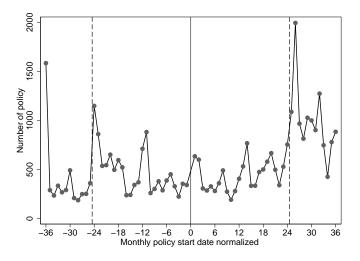






FIGURE 14: Number of life insurance policies by date of subscription





| cro-series and Data | Empirical approach | | rk Optimal inheritance tax rat | e Apper |
|--|--|---------------------|--------------------------------|----------------------|
| | | | | |
| | TABLE 10: N | Varrowing the w | indow "±1 year" | |
| | | (1) | (2) | (3) |
| | | Treatr | ment : Aged 70 or more | 9 |
| | - | Average effect | Between 70 and 75 | After 75 |
| (Policy taken | out between 20/ | /11/1990 and 20 |)/11/1992) | |
| Reduced-form | i estimate | -0.059** (0.030) | -0.048 (0.030) | -0.115*** (0.037) |
| Elasticity $\frac{d \log q}{d \log q}$ | $\frac{\partial y}{\partial -\tau}$ estimate | 0.204** (0.103) | 0.168 (0.103) | 0.401*** (0.130) |
| Number of ob Number of inc | | 286425 10864 | 286425 10864 | 286425 10864 |

* p < 0.1, ** p < 0.05, *** p < 0.01. The standard errors in parentheses are clustered at the individual level.

| o-series and Data | Empirical approach 0000000000000 000000000 | Theoretical framewor | rk Optimal inheritance tax rat | е Арреі |
|---------------------------------|--|----------------------|--------------------------------|----------------------|
| | TABLE 11. W | lidening the wir | ndow "±5 γears" | |
| | TABLE TT. V | (1) | (2) | (3) |
| | | Treatr | ment : Aged 70 or more | e |
| | - | Average effect | Between 70 and 75 | After 75 |
| (Policy taken | out between 20/ | 11/1986 and 20 | /11/1996) | |
| Reduced-for | m estimate | -0.061*** (0.011) | -0.059*** (0.011) | -0.072*** (0.014) |
| Elasticity $\frac{d}{d \log d}$ | $\frac{\log y}{\log 1-\tau}$ estimate | 0.210*** (0.039) | 0.203*** (0.039) | 0.249*** (0.049) |
| Number of ol Number of in | | 2269600 87286 | 2269600 87286 | 2269600 87286 |

the individual level.

Return

| | Empirical approach | | Coptimal inheritance tax rate | e Appe | | |
|--|--------------------|-----------------------------|-------------------------------|----------|--|--|
| | | | | | | |
| | Pobuotago C | hook 2 · Poth are | una unaffactad by the | roform | | |
| TABLE 12. | Robusiness C | neck 2 . Both gro | oups unaffected by the | reiorm | | |
| | | (1) | (2) | (3) | | |
| | | Treatment : Aged 70 or more | | | | |
| | | Average effect | Between 70 and 75 | After 75 | | |
| (Policy taken | out between 20 | 0/11/1987 and 20 | /11/1991) | | | |
| Reduced-form estimate | | -0.035* | -0.037* | -0.025 | | |
| | | (0.019) | (0.019) | (0.024) | | |
| Elasticity $\frac{d \log y}{d \log 1 - \tau}$ estimate | | 0.122* | 0.128* | 0.087 | | |
| | | (0.066) | (0.065) | (0.084) | | |
| Number of observations | | 586490 | 586490 | 586490 | | |
| Number of individuals | | 23448 | 23448 | 23448 | | |

p < 0.1, ^ p < 0.05, the individual level. Return М

| | ical approach 0000000000 000000 | Theoretical framewor | k Optimal inheritance tax ra | te Apper | | |
|--|---------------------------------------|-----------------------------|------------------------------|--------------------|--|--|
| | | | | | | |
| TABLE 13: Ro | bustness Cł | neck 3 : Both g | roups affected by the | reform | | |
| | | (1) | (2) | (3) | | |
| | | Treatment : Aged 70 or more | | | | |
| | A | verage effect | Between 70 and 75 | After 75 | | |
| (Policy taken out be | etween 20/1 | 1/1991 and 20 |)/11/1995) | | | |
| Reduced-form estir | nate | 0.027 (0.018) | 0.024 (0.018) | 0.042* (0.022) | | |
| Elasticity $\frac{d \log y}{d \log 1 - \tau}$ estimate | | -0.093 (0.062) | -0.083 (0.062) | -0.147* (0.077) | | |
| Number of observations Number of individuals | | 1113739 42325 | 1113739 42325 | 1113739 42325 | | |

* p < 0.1, ** p < 0.05, *** p < 0.01. The standard errors in parentheses are clustered at the individual level. Return