

At a Glance

H.J. Res. 25, a joint resolution providing for Congressional disapproval under chapter 8 of title 5, United States Code, of the rule submitted by the Internal Revenue Service relating to “Gross Proceeds Reporting by Brokers That Regularly Provide Services Effectuating Digital Asset Sales”

As reported by the House Committee on Ways and Means on February 28, 2025

By Fiscal Year, Billions of Dollars	2025	2025-2030	2025-2035
Direct Spending (Outlays)	0	0	0
Revenues	-0.1	-1.8	-4.5
Increase or Decrease (-) in the Deficit	0.1	1.8	4.5
Spending Subject to Appropriation (Outlays)	*	*	not estimated

Increases <i>net direct spending</i> in any of the four consecutive 10-year periods beginning in 2036?	No	Statutory pay-as-you-go procedures apply?	Yes
		Mandate Effects	
Increases <i>on-budget deficits</i> in any of the four consecutive 10-year periods beginning in 2036?	> \$5 billion	Contains intergovernmental mandate?	No
		Contains private-sector mandate?	No

* = between zero and \$500,000.

The bill would

- Repeal a final rule issued by the Department of the Treasury requiring third-party reporting to the Internal Revenue Service for certain cryptocurrency transactions
- Prohibit the issuance of the same or a similar rule in the future

Estimated budgetary effects would mainly stem from

- A reduction in third-party reporting on cryptocurrency transactions subject to taxation

Areas of significant uncertainty include

- Uncertainty of underlying projections, which are based on an assumption that current laws generally remain in place
- Anticipating taxpayers’ response to changes in tax law

Detailed estimate begins on the next page.

Bill Summary

H.J. Res. 25 would disapprove the final rule published by the Department of the Treasury in December 2024 relating to a provision of the 2021 Infrastructure Investment and Jobs Act (Public Law 117-58) that requires entities that qualify as “brokers” for cryptocurrency transactions to report certain information to the Internal Revenue Service (IRS) for tax purposes.¹ The final rule defines brokers to include centralized, or custodial, participants and decentralized, or noncustodial, participants. By invoking a legislative process established in the Congressional Review Act, the resolution would repeal the rule and prohibit the issuance of the same or any similar rule in the future.

Estimated Federal Cost

The estimated budgetary effect of H.J. Res. 25 is shown in Table 1. The costs of the legislation fall within budget function 800 (general government).

Table 1. Estimated Budgetary Effects of H.J. Res. 25													
By Fiscal Year, Billions of Dollars												2025-2030	2025-2035
	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035		
Decreases in Revenues													
Estimated Revenues	-0.1	-0.2	-0.3	-0.3	-0.4	-0.5	-0.5	-0.5	-0.5	-0.5	-0.6	-1.8	-4.5
Increases in Spending Subject to Appropriation													
Estimated Authorization	*	*	*	*	*	*	n.e.	n.e.	n.e.	n.e.	n.e.	*	n.e.
Estimated Outlays	*	*	*	*	*	*	n.e.	n.e.	n.e.	n.e.	n.e.	*	n.e.

Sources: Congressional Budget Office; staff of the Joint Committee on Taxation.
n.e. = not estimated; * = between zero and \$500,000.

Basis of Estimate

The Congressional Budget Act of 1974, as amended, stipulates that revenue estimates provided by the staff of the Joint Committee on Taxation (JCT) are the official estimates for all tax legislation considered by the Congress. CBO therefore incorporates such estimates

1. Department of the Treasury, Internal Revenue Service “Gross Proceeds Reporting by Brokers That Regularly Provide Services Effectuating Digital Asset Sales,” Final Rule, 89 *Fed. Reg.* 106928 (December 20, 2024), <https://tinyurl.com/4c3f26dn>.

into its cost estimates of the effects of legislation. The revenue estimates for the bill were provided by JCT.²

Revenues

JCT estimates that enacting the bill would reduce revenues by \$4.5 billion over the 2025-2035 period.

The repeal of the rule would lead to a reduction in third-party reporting to the IRS by decentralized participants for cryptocurrency transactions. Because the IRS would no longer have third-party verification of certain transactions, taxable income related to cryptocurrency may be subject to greater misreporting.

Spending Subject to Appropriation

CBO estimates that the administrative costs to implement the resolution would not be significant over the 2025-2030 period. Any related spending would be subject to the availability of appropriated funds.

Uncertainty

JCT's estimates of the budgetary effects of H.J. Res. 25 are subject to uncertainty: They are made on the basis of underlying projections and other factors that could change significantly. In particular, the estimates rely in part on CBO's economic projections for the next decade under current law and on expectations of the way taxpayers might respond to changes in tax law.

Pay-As-You-Go Considerations

The Statutory Pay-As-You-Go Act of 2010 establishes budget-reporting and enforcement procedures for legislation affecting direct spending or revenues. The net changes in revenues that are subject to those pay-as-you-go procedures are shown in Table 1.

Increase in Long-Term Net Direct Spending and Deficits

CBO and JCT estimate that enacting H.J. Res. 25 would not increase net direct spending in any of the four consecutive 10-year periods beginning in 2036. JCT estimates that the bill would reduce revenues and increase on-budget deficits by more than \$5 billion in at least one of the four consecutive 10-year periods beginning in 2036.

2. See Joint Committee on Taxation, Description of H.J. Res. 25, A Joint Resolution Providing for Congressional Disapproval Under Chapter 8 of Title 5, United States Code, of the Rule Submitted by the Department of the Treasury relating to "Gross Proceeds Reporting by Brokers That Regularly Provide Services Effectuating Digital Asset Sales," JCX-11-25 (February 24, 2025), www.jct.gov/publications/2025/jcx-11-25.

Mandates

JCT has determined that the bill contains no intergovernmental or private-sector mandates as defined in the Unfunded Mandates Reform Act.

Estimate Prepared By

Federal Costs: Jennifer Shand, Tax Analysis Division

Revenues: Staff of the Joint Committee on Taxation

Mandates: Andrew Laughlin; staff of the Joint Committee on Taxation

Estimate Reviewed By

Kathleen FitzGerald
Chief, Public and Private Mandates Unit

Ann E. Futrell
Senior Advisor, Budget Analysis Division

Joshua Shakin
Chief, Revenue Projections Unit

H. Samuel Papenfuss
Deputy Director of Budget Analysis

John McClelland
Director of Tax Analysis

Estimate Approved By



Phillip L. Swagel
Director, Congressional Budget Office