

# Notes on Non-linear Taxation

Iván Werning

## 1 Income Taxation

### 1.1 Setup

- two goods  
(alternatively, other goods untaxed, perhaps because of Atkinson-Stiglitz case)

- Preference

$$U^i(c, Y) = U(c, Y, \theta^i)$$

- Technology

$$G + \int (c(\theta) - Y(\theta))dF(\theta) \leq e$$

- $F$  can be continuous or not (e.g. with finite types  $G + \sum_i (c(\theta^i) - Y(\theta))\pi^i \leq e$ )
- Income taxation: budget constraint is

$$B = \{(c, Y) | c \leq Y - T(Y)\}$$

for some  $T(Y)$ .

- call  $R(Y) \equiv Y - T(Y)$  the retention function
- Normative Criterion?
  1. Welfare function (Mirrlees, 1971)
  2. Pareto efficiency

## 1.2 Feasibility and Incentive compatibility

- agent behavior

$$\max_{c,Y} U^i(c, Y) \quad \text{s.t. } c \leq Y - T(Y) = R(Y)$$

- Definition. An allocation and a tax function  $c, Y, T$  is feasible if: (i) RC holds; (ii) agents maximize  $\{c(\theta), y(\theta)\}$  given  $T(Y)$  [given  $R(Y)$ ]
- An allocation  $c(\theta), Y(\theta)$  is feasible if there exists a tax function that makes  $c, Y, T$  feasible.
- Note that resource constraint is the same as...

$$G - e \leq \int T(Y(\theta)) dF(\theta)$$

government budget constraint.

- Observation: if  $c, Y$  is feasible then

$$u(c(\theta), Y(\theta), \theta) \geq u(c(\theta'), Y(\theta'), \theta) \quad \text{for all } \theta, \theta' \in \Theta$$

Incentive Compatibility Constraints (IC)

- Converse also true:

$$R(\tilde{Y}) \equiv \sup\{\tilde{c} | u(c(\theta), Y(\theta), \theta) \geq u(\tilde{c}, \tilde{Y}, \theta) \text{ for all } \theta\}$$

IC holds  $\implies$  if agents faced with  $R$  then optimum is attainable (optimal by definition of  $R$ )

- note:  $R(Y)$  continuous by theorem of the max.
- Taxation principle and revelation principle
- Marginal taxes: if  $T'(\tilde{Y})$  exists and  $\tilde{Y} = Y(\theta)$  for some  $\theta$  then

$$T'(\tilde{Y}) = T'(Y(\theta)) = 1 - MRS(c(\theta), Y(\theta), \theta)$$

where

$$MRS(c, Y, \theta) \equiv - \frac{U_Y(c, Y, \theta)}{U_c(c, Y, \theta)}$$

- Single crossing

$MRS(c, Y, \theta)$  is decreasing in  $\theta$

- Single crossing  $\implies c(\theta)$  and  $y(\theta)$  non-decreasing
- Finite types: Single crossing  $\implies$  local IC are sufficient

$$\begin{aligned} u(c(\theta^i), y(\theta^i), \theta^i) &\geq u(c(\theta^{i-1}), y(\theta^{i-1}), \theta^i) \\ u(c(\theta^{i-1}), y(\theta^{i-1}), \theta^{i-1}) &\geq u(c(\theta^i), y(\theta^i), \theta^{i-1}) \end{aligned}$$

[homework: show others are implied]

- note: local IC's imply monotonicity

### 1.3 Two types case

- Assume  $\Theta = \{\theta_L, \theta_H\}$  with  $\theta_L < \theta_H$
- result 1: pooling is inefficient  
...only one IC binds
- result 2: for binding agent we have  $MRS = 1$   
... no taxation at the top.
- result 3: Pareto frontier has 3 regions
  1. First best
  2. IC for H binds
  3. IC for L binds

and frontier bends backwards

- Program ( $\bar{u}_H$  is parameter here)

$$\max u^L(c_L, y_L)$$

subject to

$$u^H(c_H, y_H) \geq \bar{u}_H$$

IC<sub>H</sub>, IC<sub>L</sub> and RC.

- First order conditions: derive same results

## 1.4 Laffer curve

- back to general case
- When is there a pareto improvement?
- Equivalently: when can we lower taxes and increase tax revenue?
- Given  $T_0(Y)$  we get  $Y_0(\theta)$  and we have

$$G - e \leq \int T_0(Y_0(\theta))dF(\theta)$$

- Is this Pareto efficient?
- suppose budget holds with equality.
- take  $T_1$  preferred to  $T_0$
- for feasibility we must have

$$G - e = \int T_0(Y_0(\theta))dF(\theta) \leq \int T_1(Y_1(\theta))dF(\theta)$$

where  $T_1(Y)$  generates  $Y_1(\theta)$

- for improvement it must be that

$$T_1(Y_1(\theta)) \leq T_0(Y_1(\theta)) \quad \text{for all } \theta$$

and we can always make  $T_1(\tilde{Y}) \leq T_0(\tilde{Y})$  at other points

- hence: (sophisticated) Laffer effect
- Result: there are such Laffer effects (we know from two type case)
- more general results: joint restrictions on...
  - tax schedule  $T$
  - preference  $U$
  - skill distribution  $F$

(note: allocation is implied)

- convert results: joint restrictions on...
  - tax schedule  $T$
  - preference  $U$
  - distribution of output  $G(\tilde{Y})$  (where  $G(Y(\theta)) = F(\theta)$ )

(note: skill distribution is implied)

## 1.5 IC with a continuum

- need to make IC simpler
  - necessary: local IC + monotonicity
  - also sufficient!

- informally

$$v(\theta) = \max_{\theta'} U(c(\theta'), y(\theta'), \theta) = U(c(\theta), y(\theta), \theta)$$

first order condition...

$$U_c(c(\theta'), y(\theta'), \theta) c'(\theta') + U_y(c(\theta'), y(\theta'), \theta) y'(\theta') = 0$$

or rearranging

$$\left[ \frac{c'(\theta')}{y'(\theta')} - MRS(c(\theta'), y(\theta'), \theta) \right] U_c(c(\theta'), y(\theta'), \theta) y'(\theta') = 0$$

$$h(\theta, \theta') g(\theta, \theta') = 0$$

- we want this to hold for  $\theta = \theta'$  (truth-telling)
- second order condition (informally)

$$h_{\theta'}(\theta, \theta) g(\theta, \theta) + h(\theta, \theta) g_{\theta'}(\theta, \theta) \leq 0$$

Now, either  $g$  or  $h$  is zero so that we need to worry about the other term. In regions where  $g = 0$ , trivially satisfied. In other regions, with  $y' > 0$  and  $h = 0$  we need

$$h_{\theta'}(\theta, \theta) \leq 0$$

but we know that (since  $h(\theta, \theta) = 0$  over this region):

$$h_{\theta'}(\theta, \theta) + h_{\theta}(\theta, \theta) = 0$$

and we know that  $h_{\theta}(\theta, \theta) > 0$  by the single crossing condition! QED

- stronger result: not just local SOC but actually a max

- note that  $g(\theta, \theta') > 0$

- for  $\theta' < \theta$  then we have

$$h(\theta, \theta') > h(\theta', \theta') = 0$$

- the reverse is true for  $\theta' > \theta$

$$h(\theta, \theta') < h(\theta', \theta') = 0$$

- thus,  $\theta' = \theta$  is optimal

- a better approach:

- change of variables  $c, y$  to  $v, y$

$$v(\theta) = U(c(\theta), y(\theta), \theta)$$

$$c(\theta) = e(v(\theta), y(\theta), \theta)$$

- let's get the local IC in terms of  $v$ ...

$$v(\theta) - U(c(\theta'), y(\theta'), \theta) \leq 0$$

and with equality for  $\theta' = \theta$ . So  $v(\theta) - U(c(\theta'), y(\theta'), \theta)$  is maximized over  $\theta$  at  $\theta = \theta'$ . The FOC must be

$$v'(\theta) - U_{\theta} = 0$$

- more generally, an Envelope theorem implies

$$v'(\theta) = U_{\theta}(c(\theta), y(\theta), \theta)$$

or the integral version...

$$v(\theta) = \int^{\theta} U_{\theta}(c(\theta'), y(\theta'), \theta') d\theta'$$

[Milgrom and Segal]

– Result:  $v, y$  is incentive compatible (i.e. implies  $c, y$  that is IC) iff EC and monotonicity hold

- Duality: Pareto efficiency iff minimize resources subject to delivering  $v(\theta)$  or more

## 2 Pareto Efficient Income Taxation

- Dual for Pareto efficiency:

$$\max_{y, v} \int (y(\theta) - e(v(\theta), y(\theta), \theta)) f(\theta) d\theta$$

$$v'(\theta) = U_{\theta}(e(v(\theta), y(\theta), \theta), y(\theta), \theta)$$

$$v(\theta) \geq \bar{v}(\theta)$$

- where  $\{\bar{v}(\theta)\}$  is some parameter

- Remarks:

- from this we can compute  $c(\theta) = e(v(\theta), y(\theta), \theta)$  and then with  $c(\theta), y(\theta)$  find retention function  $R(y)$  and tax function  $T(y)$
- in general we will have some multiplier  $\zeta(\theta) = \lambda(\theta) f(\theta) / \eta$  on the last constraint (with  $\lambda(\theta) = 0$  if the constraint is slack)
- $\zeta(\theta) = \lambda(\theta) f(\theta) / \eta$  and  $\bar{v}(\theta)$  related

- Solve

$$\max_{y, v} \left\{ \int (y(\theta) - e(v(\theta), y(\theta), \theta)) f(\theta) d\theta + \frac{1}{\eta} \int \lambda(\theta) v(\theta) f(\theta) d\theta \right\}$$

subject to

$$v'(\theta) = U_{\theta}(e(v(\theta), y(\theta), \theta), y(\theta), \theta)$$

- equivalently

$$\frac{1}{\eta} \max_{y,v} \left\{ \eta \int (y(\theta) - e(v(\theta), y(\theta), \theta)) f(\theta) d\theta + \int \lambda(\theta) v(\theta) f(\theta) d\theta \right\}$$

which is the Lagrangian that comes out of the problem with objective (Welfare function?)

$$\begin{aligned} & \max_{y,v} \left\{ \int \lambda(\theta) v(\theta) f(\theta) d\theta \right\} \\ & v'(\theta) = U_{\theta}(e(v(\theta), y(\theta), \theta), y(\theta), \theta) \\ & \int (y(\theta) - e(v(\theta), y(\theta), \theta)) f(\theta) d\theta \leq e \end{aligned}$$

for some  $e$  (related to  $\eta$ )

- Utilitarian case is then  $\lambda(\theta) = 1$

- optimal control ( $v$  is state and  $y$  is control)
- FOCs the same with  $\lambda(\theta) = 1$  (total multiplier  $\zeta(\theta) = f(\theta)/\eta$ )

- Form Lagrangian

$$\begin{aligned} L \equiv & \int (y(\theta) - e(v(\theta), y(\theta), \theta)) f(\theta) d\theta + \frac{1}{\eta} \int \lambda(\theta) v(\theta) f(\theta) d\theta \\ & + \int \mu'(\theta) v(\theta) + \int \mu(\theta) U_{\theta}(e(v(\theta), y(\theta), \theta), y(\theta), \theta) \end{aligned}$$

- defining

$$\hat{\mu} = \mu U_c$$

- FOCs:

$$-\hat{\mu}'(\theta) - \hat{\mu}(\theta) \frac{\partial MRS(c(\theta), y(\theta), \theta)}{\partial c} y'(\theta) + \zeta(\theta) U_c(c(\theta), y(\theta), \theta) = f(\theta)$$

$$\frac{\tau(\theta)}{1 - \tau(\theta)} f(\theta) = -\hat{\mu}(\theta) \frac{\partial \log MRS(c(\theta), y(\theta), \theta)}{\partial \theta}$$

- Pareto efficiency: multiplier  $\zeta(\theta) \geq 0$  so check...

$$-\hat{\mu}'(\theta) - \hat{\mu}(\theta) \frac{\partial MRS(c(\theta), y(\theta), \theta)}{\partial c} y'(\theta) \leq f(\theta)$$

$$\frac{\tau(\theta)}{1 - \tau(\theta)} f(\theta) = -\hat{\mu}(\theta) \frac{\partial \log MRS(c(\theta), y(\theta), \theta)}{\partial \theta}$$

- take tax system, utility as given...
    - ... hence, take allocation, taxes and utility as given
  - observe distribution of output: infer distribution of skills (more later)
  - second equation gives  $\hat{\mu}$  uniquely, first inequality is restriction
  - note: anything goes: there exists an  $f$  such that condition is met given  $U$  and  $T$
  - given  $f$  and  $U$ : many  $T$  are inefficient, many efficient
  - tax at top and bottom:  $\tau(\bar{\theta}) \leq 0$  and  $\tau(\underline{\theta}) \geq 0$
- Utilitarian: set  $\zeta(\theta) = f(\theta)/\eta$  and solve ODEs:

$$-\hat{\mu}'(\theta) - \hat{\mu}(\theta) \frac{\partial MRS(c(\theta), y(\theta), \theta)}{\partial c} y'(\theta) + \frac{1}{\eta} f(\theta) U_c(c(\theta), y(\theta), \theta) = f(\theta)$$

$$\frac{\tau(\theta)}{1 - \tau(\theta)} f(\theta) = -\hat{\mu}(\theta) \frac{\partial \log MRS(c(\theta), y(\theta), \theta)}{\partial \theta}$$

along with  $\mu(\underline{\theta}) = \mu(\bar{\theta}) = 0$  [since state  $v$  is free at the boundaries; or note the special FOCs for them derived in recitation]

- a bit more involved
  - can be done numerically
  - special cases:  $U$  quasi-linear in  $c$  (so that  $\frac{\partial MRS(c(\theta), y(\theta), \theta)}{\partial c} = 0$ )
  - check Diamond and Saez papers
- Saez identification: observe output distribution  $H...$

$$F(\theta) = H(y(\theta))$$

$$f(\theta) = h(y(\theta))y'(\theta)$$

- given  $U$  and  $T$  we can compute  $y(\theta)$  and hence  $y'(\theta)...$

$$y'(\theta) = \frac{\frac{\partial \log MRS(c(\theta), y(\theta), \theta)}{\partial \theta}}{\frac{1}{\varepsilon_w^* Y} + \frac{T''(Y)}{1 - T'(Y)}}$$

- ...nicer to solve for  $y'(\theta)$  in terms of local conditions (some algebra later; see Recitation)

$$-\hat{\mu}'(\theta) - \hat{\mu}(\theta) \frac{\partial MRS(c(\theta), y(\theta), \theta)}{\partial c} \leq h(y(\theta))$$

$$\hat{\mu}(\theta) = \frac{T'(y)}{1 - T'(y)} \varepsilon_w^*(Y) Y \frac{h(y(\theta))}{1 + Y \varepsilon_w^*(Y) \frac{T''(Y)}{1 - T'(Y)}}$$

- (utilitarian case:  $-\hat{\mu}'(\theta) - \hat{\mu}(\theta) \frac{\partial MRS(c(\theta), y(\theta), \theta)}{\partial c} = (1 - \lambda U_c) h(y(\theta))$ )
- Saez defines the “virtual density”...

$$h^*(Y) = \frac{h(y)}{1 + Y \varepsilon_w^*(Y) \frac{T''(Y)}{1 - T'(Y)}} = \frac{h(y)}{\Phi(y)}$$

- after substituting...

$$\frac{\tau}{1 - \tau} \frac{\varepsilon_w^*}{\Phi} \left( -\frac{d \log \frac{\tau}{1 - \tau}}{d \log y} - \frac{d \log h^*}{d \log Y} - 1 - \frac{d \log \varepsilon_w^*}{d \log Y} - \frac{\partial MRS}{\partial c} \frac{1}{y} \right) \leq 1$$

- think through role of each term
- intuition for inefficient tax: Laffer argument
- generalizes: tax at top and bottom:  $\tau(\bar{\theta}) \leq 0$  and  $\tau(\underline{\theta}) \geq 0$

$$\frac{d \log h^*}{d \log Y} = -\infty \quad \text{or} \quad \frac{d \log h^*}{d \log Y} = \infty$$

- Discussion:

1. anything goes again: exists  $h^*$  given  $U$  and  $T$
2. linear tax optimal? Yes, depends on distribution.
3. maximum level of asymptotic tax rate (many terms cancel)
4. connection with Rawlsian optimum

- observable characteristics: Differential taxation?

- Pareto efficient to ignore? Yes, in some cases...
  - ... new condition is average of previous condition

- Pareto improvement to differentiate? Yes, in some cases...  
... if previous condition is violated for some group

### 3 Extensive Margin Model

- Diamond (1980): nonlinear taxation with extensive margin (no intensive margin).
- as before, preferences are

$$U(c, Y, \theta)$$

- but now

- assume only two possible levels of  $Y$  for each  $\theta$

$$\{0, Y(\theta)\}$$

- $Y(\theta)$  continuous and increasing

- $\theta \in [0, \infty)$

- $Y(0) = 0$

- assume some measure  $N$  of agents simply cannot work

- for agent  $\theta$  to prefer work we require

$$U(c(\theta), Y(\theta), \theta) \geq U(b, 0, 0)$$

- incentive constraint

- like before, compares allocation intended for  $\theta$  to others'

- previously:

- \* compared to all other bundles

- \* binding were neighbours (with single crossing assumptions)

- now: relevant binding constraint is always allocation meant for  $\theta = 0$  i.e.  $Y = 0$ , so binding constraint skips neighbours, in this sense this is a violation of single crossing

- it might be optimal to make some agents that are capable of working not work, but we will assume instead that we make them all work

- Planning Problem:

$$\max \left\{ NU(b, 0, \theta) + \int U(c(\theta), Y(\theta), \theta) f(\theta) d\theta \right\}$$

s.t.

$$Nb + \int (c(\theta) - Y(\theta)) f(\theta) d\theta \leq e$$

$$U(c(\theta), Y(\theta), \theta) \geq U(b, 0, 0)$$

- first order conditions:

$$U_b(b, 0, 0) = \lambda - \frac{1}{N} \int \mu(\theta) d\theta$$

$$U_c(c(\theta), Y(\theta), \theta) = \lambda + \mu(\theta)$$

and  $\mu(\theta) \geq 0$

$$\mu(\theta)[U(c(\theta), Y(\theta), \theta) - U(b, 0, 0)] = 0$$

as well as both constraints holding.

- combining the conditions gives:

$$U_c(c(\theta), Y(\theta), \theta) \leq U_b(b, 0, 0) + \frac{1}{N} \int \mu(\theta) d\theta < U_b(b, 0, 0)$$

as long as the work constraint binds for some agents

- with separable utility  $u(c) - v(Y, \theta)$  this implies immediately that

$$c(\theta) > b$$

for all  $\theta$  and that

$$\lim_{\theta \rightarrow 0} c(\theta) > b$$

- indeed with separable utility we must have  $\mu(\theta) = 0$  and  $U(c(\theta), Y(\theta), \theta) > U(b, 0, 0)$  for low enough  $\theta$
- nice case has preferences independent of  $\theta$ :

$$u(c, Y, \theta) = U(c, Y)$$

- then easy to see that defining the equalizing difference

$$U(c^e(Y), Y) = U(b, 0)$$

we have that optimal consumption is

$$c^*(Y) = \max\{c^e(Y), \bar{c}\}$$

where  $\bar{c} \equiv (u')^{-1}(\lambda) > b$

- conclusions:
  - we get an upward discontinuity in  $c(\theta)$
  - more general: symptomatic that marginal tax may be negative
  - possible odd result: consumption  $c(\theta)$  may not be monotone (could be fixed with additional assumptions) (i.e. marginal taxes may be higher than 100%)
- comments:
  - overall:
    - \* with Utilitarian, less sharp restrictions on marginal taxes Mirrlees model, i.e. here they can be negative or higher than 100%.
    - \* but not clear if less implications for Pareto efficient.
  - Here: some people can work, others suffer infinite disutility (i.e. can't work). Diamond's paper has a more general joint distribution between skill and labor disutility. Optimum then needs to determine how many people work, at each skill level.
  - Saez combines intensive and extensive margin.
- Planning problem

$$\max \left\{ \int \int_{n^*(\theta)} U(b, 0, \theta) dnd\theta + \int \int^{n^*(\theta)} U(c(n), Y(n), \theta) f(\theta, n) dnd\theta \right\}$$

s.t.

$$Nb + \int (c(\theta) - Y(\theta)) f(\theta) d\theta \leq e$$

$$U(c(\theta), Y(\theta), \theta) \geq U(b, 0, 0)$$

MIT OpenCourseWare  
<http://ocw.mit.edu>

14.471 Public Economics I  
Fall 2012

For information about citing these materials or our Terms of Use, visit: <http://ocw.mit.edu/terms>.