

ABSTRACT

In today's rapidly evolving, technologically-focused economy, a higher education degree is a near-requirement in order to enter a professional field and earn a livable wage. As currently written, however, the Internal Revenue Code (the Code) disallows cost recovery for higher education expenditures in nearly all situations. The failure of the Code to allow cost recovery of higher education expenditures, while broadly providing for cost recovery of other expenditures, has ramifications for the equitable tax treatment of education costs and the long-term prospects of our economy. This Article advocates an amendment to the Code to allow cost recovery of higher education expenditures through amortization.

I. INTRODUCTION

As currently written, the Code disallows deductions for education expenditures in all but a few limited circumstances.¹ And the Code does not allow taxpayers to amortize these costs in any situation.² Specifically, cost recovery is disallowed for expenditures for education that enable the taxpayer to meet the minimum educational requirements of a trade or business or qualify for a new trade or business.³ The Code does, however, allow cost recovery of expenditures for education necessary to satisfy formal conditions for employment retention or for the maintenance or improvement of vital skills.⁴ The distinction between nondeductible and deductible education expenses hinges on the Code's classification of the former as "personal expenditures or . . . an inseparable aggregate of personal and capital

† Judicial Law Clerk, Hon. Jonathan W. Feldman, J.D., *cum laude*, Boston College Law School, 2017. B.A., Syracuse University, 2014.

1. See Treas. Reg. § 1.162-5 (as amended in 1967).

2. See *Wright v. Comm'r*, 32 T.C.M. (CCH) 31 (1973) (stating that because "acquiring an education increases . . . earning capacity," any deduction must be taken under § 162); see also *Sharon v. Comm'r (Sharon II)*, 591 F.2d 1273, 1275 (9th Cir. 1978) (affirming the Tax Court's finding that college and law school expenses were nondeductible personal expenditures and therefore could not be deducted or amortized). Courts and the regulations specifically deny a deduction for education expenditures under any Code section other than 162. See Treas. Reg. § 1.262-1(b)(9) (as amended in 2014) ("Expenditures made by a taxpayer in obtaining an education or in furthering his [or her] education are not deductible unless they qualify under [§] 162 and § 1.162-5"); David S. Davenport, *Education and Human Capital: Pursuing an Ideal Income Tax and a Sensible Tax Policy*, 42 CASE W. RES. L. REV. 793, 807 (1992) (noting that courts and the regulations deny an education expense deduction under every Code section except § 162).

3. Treas. Reg. § 1.162-5(b)(2).

4. *Id.* § 1.162-5(b)(1).

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