

Section	Concept	SB 851 Treatment	IRC Ref.
1	Adding to chapter 316		
2	One-time repatriation	Clarifies that add back of amounts federally deducted is required for individuals.	965(c)(1)
3	Adding to chapter 314		
4	GILTI	Indicates Oregon will treat GILTI in the same manner as a dividend.	951A
5(1)(b)	Technical change	Changing reference from name of the act to the IRC reference to be consistent in style.	
5(1)(c)	GILTI	Requiring amounts deducted as GILTI be added back to FTI for Oregon purposes.	250
5(2)(b)	GILTI	Indicates that Oregon will provide GILTI an 80% DRD.	951A
5(2)(f)	Foreign-source dividend income	Avoids a double-deduction on this type of dividend income.	245A
5(3)	Foreign-source dividend income and GILTI apportionment representation	Addresses factor representation for amounts subject to taxation in Oregon.	245A, 250, 951A
6(1)	Applicability dates	Personal income repatriation applies to tax years 2017, 2018.	
6(2)	Applicability dates	Sections 4 and 5 of this act apply to tax years beginning on or after Jan. 1, 2018	
7	Penalty and Interest for Repatriation	DOR will not impose penalties and interest related to personal income repatriation changes.	965(c)(1)
8	Applicability dates	Section 7 applies to tax years 2017 and 2018.	
9	Effective date	Act takes effect on the 91st day following adjournment sine die.	