# INCOME TAXATION OF COUPLES AND THE TAX UNIT CHOICE

# HELMUTH CREMER JEAN-MARIE LOZACHMEUR PIERRE PESTIEAU

## CESIFO WORKING PAPER NO. 2005

CATEGORY 1: PUBLIC FINANCE MAY 2007

Presented at CESifo Area Conference on Public Sector Economics, April 2007

An electronic version of the paper may be downloaded
 from the SSRN website: www.SSRN.com
 from the RePEc website: www.RePEc.org

• from the CESifo website: www.CESifo-group.de

# INCOME TAXATION OF COUPLES AND THE TAX UNIT CHOICE

#### **Abstract**

This paper studies the optimal non linear income tax of couples. We build a general unitary model of labor supply and allow multidimensional heterogeneity in a discrete type framework. We concentrate our analysis on the resulting intra-family labor allocation of labor supplies and show that this analysis is strongly related to the choice of the tax unit (individual versus joint taxation). We give a necessary condition to have fully joint taxation in this framework and discuss some examples.

JEL Code: H21, H31, D13.

Helmuth Cremer GREMAQ and IDEI University of Toulouse 21 Allée de Brienne 31000 Toulouse France helmut@cict.fr Jean-Marie Lozachmeur
GREMAQ, Manufacture des Tabacs
University of Toulouse 1
21 Allée de Brienne
31000 Toulouse
France
jean-marie.lozachmeur@univ-tlse1.fr

Pierre Pestieau University of Liège Sart Tilman Boulevard du Rectorat, 7 (B 31) 4000 – Liège Belgium p.pestieau@ulg.ac.be

June 2006, revised May 2007

This paper has been presented at the CESifo Public Sector Economics Conference, (Munich, May 2007). We thank the participants and particularly our discussant, Bas Jacobs, for their comments.

#### 1 Introduction

The tax treatment of couples has been a heavily debated subject among economists and noneconomists alike. Family taxation rules continue to differ significantly across countries, even though there appears to be a trend towards more "individualized" tax system. It does appear that family (or couple) based schemes tend to be replaced by systems that rely on the individual as the relevant tax unit. Accordingly, an individual's tax liability depends less than previously on the spouse's income. This trend has been observed over the last decades in most tax reforms in OECD countries. Nevertheless, in some countries like France, the systems remain to a substantial part family-based.

Accounting for the family dimension when studying optimal income taxation thus appears to be highly important. Among economists, it is generally admitted that the couple's secondary earner is also the one with the higher elasticity of labor supply (e.g. see Blundell and MaCurdy, 1999). Following the traditional Ramsey rule, the secondary wage earner should face a lower linear tax (see Boskin, 1975 and Boskin and Sheshinski, 1983). This pleads in general for a tax unit that is based on individual incomes. However, an individual's welfare largely depends upon the total couple's income. Thus it may be desirable to introduce a certain degree of progressivity depending upon the family's income.

The literature on this topic is quite scarce and restrictive. Following the seminal paper by Boskin (1975) and Boskin and Sheshinsky (1983), authors have usually constrained the analysis of optimal family income taxation to the framework of only linear instruments.<sup>1</sup> As a result, the choice of the tax unit only depends upon the difference between optimal tax rates of the primary and the secondary earners: joint taxation is desirable if and only if these two tax rates are equal.

In reality, the picture is however more complicated than that. The taxation of a couple typically depends upon the primary and the secondary labor incomes. On one extreme, there is pure *joint taxation* if the tax function depends only on the sum of these two incomes. As a result, the marginal tax rate is the same for both spouses of

<sup>&</sup>lt;sup>1</sup>Exemples are papers by Apps and Rees (1988, 1999) or more recently Kleven (2004).

the same couple. On the other extreme we have *individual taxation* under which the tax paid by the family is the addition of two tax functions each depending only upon one spouse's income. In this situation, the tax unit is purely based on individual incomes, but this does not however preclude the case where both spouses' marginal tax rates are equal. Between these two polar cases, joint taxation and individual taxation, the most widespread system is one of *selective taxation* under which secondary earners, usually women, are taxed on a separate, lower, progressive tax schedule than that of primary earners.

The design of the tax function is often expressed in terms of the choice of the "tax unit": couple versus individual. Thus joint taxation corresponds to choosing the couple as the tax unit, with their combined income being the tax base while individual and selective taxation have the individual as the tax unit and the individual income as tax base. In this paper we study the conditions that lead to a specific tax system, particularly the joint one. Our approach is in the tradition of non-linear optimal income taxation. We thus assume away some of the considerations that can explain the observed move towards individualization of tax rules. One of them is ethical and reflects the view individuals should be given priority over couples in the name of responsibility. Another one is informational: marital status is assumed to be observable. This is a strong assumption because we live in a world with a wide variety of living arrangement and it is not always easy for tax authorities to sort out them. Typically couples can pretend living separately if they find it more attractive in terms of tax burden.

We study the optimal income taxation of couples in a nonlinear framework (Mirrlees, 1971). To the best of our knowledge, only two papers have studied this issue. The first one is the paper by Shroyen (2003) who studies optimal nonlinear income taxation in a setting where labor supply decisions are made within the household (couple) while the tax schedule is by assumption based on individual filing. He shows that the household structure and particularly the mating pattern affects the structure of an individual based income tax. The second paper is the one by Kleven et al. (2005). They study a general problem of optimum taxation of two wage earners family allowing multidimensional differences across families within a unitary model (of family decision making). They are

interested in determining whether the tax function is *separable* into two individuals and independent tax schedules and in the asymptotic design of these tax functions.

Our contribution is very much complementary to the one of Kleven et al. (2005). We use a general setting where families are composed of two wage earners each characterized by a possibly different productivity (thus allowing for multidimensional heterogeneity). Our paper also uses the basic unitary model of the family but we assume a discrete distribution of productivities. We study the intra family allocation of labor supplies that is implied by the tax system. In other words, we examine wether the optimal (second-best) allocation distorts one spouse's labor supply relative to that of the other's spouse for a given level of gross income earned by the family. This issue, in turn, is strongly connected to the choice of tax unit. We show that pure joint taxation (with total household income as tax base) is equivalent to having no distortion in the allocation of both spouses' labor supplies for a given level of family income. We derive a general property stating if and how the intra-family allocation of labor is distorted. We also show in more restrictive settings how this condition can be related to the primitives of the model. To sum up, unlike Kleven et al. we are not interested in the separability of the household tax function but we examine whether a non separable function should depend solely on the sum of income or depend on the individual spouses income in a more complicated way.

#### 2 The model

#### 2.1 Couples: preferences and productivities

Consider a couple composed of two individuals indexed by j = w, h. The couple's preferences over its net income x and labor supplies  $l_j$  (j = w, h) are represented by a quasi-concave family utility function  $U(x, l_w, l_h)$ , with  $\partial U/\partial x > 0$  and  $\partial U/\partial l_j < 0$ . The society is composed of N types of couples indexed by superscript i (i = 1, ..., N) who differ in their members' labor productivities  $a_w^i$  and  $a_h^i$ . The proportion of type i couples in the economy is denoted by  $\pi_i$  where  $\sum_{i=1}^N \pi_i = 1$ . The total number of

couples is normalized at one for notational convenience.<sup>2</sup>

#### 2.2 Tax instruments and labor supply decisions

As in traditional models of optimal taxation, we assume that the individual productivities and labor supplies are not publicly observable. For any couple, however, before tax incomes of each of the spouses,  $y_w^i = a_w^i l_w^i$  and  $y_h^i = a_h^i l_h^i$  are observable. The tax policy consists of a non linear tax  $T(y_w^i, y_h^i)$  on the labor incomes of the two wage earners. This general tax function may exhibit some specific properties. In reality, tax functions range from "unitary taxation" to "separable taxation". In the first case, the tax function only depends upon the total income of the couple i.e.  $T\left(y_w^i,y_h^i\right)=\widetilde{T}\left(y_w^i+y_h^i\right)$ . In the second case, the tax levied on the income of one spouse does not depend upon the income earned by the other spouse i.e.  $T\left(y_{w}^{i}, y_{h}^{i}\right) = \widehat{T}\left(y_{w}^{i}\right) + \widehat{T}\left(y_{h}^{i}\right)$ . As mentioned in the introduction, much of the existing literature, has concentrated on the class of linear tax functions. The main question addressed in these papers is whether or not the income of both spouses should be taxed at the same (marginal) tax rate. We reconsider this question with nonlinear tax instruments. In such a setting the issue of equal or unequal marginal tax rate within the couple is particularly interesting because it is closely related to the issue of the choice of the tax base. The requirement that marginal tax rates are equal, namely

$$\partial T\left(y_{w}^{i}, y_{h}^{i}\right) / \partial y_{w}^{i} = \partial T\left(y_{w}^{i}, y_{h}^{i}\right) / \partial y_{h}^{i}, \qquad \forall i = 1, \dots, N, \tag{1}$$

is a necessary condition to have a unitary taxation system. It is also sufficient in the sense that when this condition holds for all couples the optimal allocation *can* be

<sup>&</sup>lt;sup>2</sup>This model of the couple is a fairly general reduced form of the unitary model. It is consistent with the existence of "private" and "public" goods in the household and with the determination of consumption and labor supply levels though a bargaining process (where the weights are exogenous and not affected by the tax policy). From that perspective, one can think of  $U(x, l_w, l_y)$  as the value function associated with the problem of allocating a household budget x to the various consumption goods, given labor supply levels  $l_w$  and  $l_y$ . In other words,  $U(x, l_w, l_y)$  specifies the maximum level of the households objective (e.g., a weighted sum of utilities or a Nash product) given labor supplies and given its total (after tax budget). Using this reduced form rather than the original household objective in the optimal tax problem does not involve any loss of generality as long as differential commodity taxation is not possible, for instance because individual consumption levels (and thus the allocation of goods within the couple) are not publicly observable.

<sup>&</sup>lt;sup>3</sup>This is admittedly a highly stylized and incomplete typology. In particular it abstracts from the tax treatment of children and relies on the assumption that there are no single individuals.

implemented by a unitary tax function.<sup>4</sup>

Condition (1) is particularly interesting because it implies that the tax system does not distort the intra-family allocation of labor supply. To be more precise, for a given level of after tax income the labor allocation between the two spouses is not affected by such a tax function. To see this, note that for a given level of after tax income  $x = y_w + y_h - T(y_w, y_h)$ , the couple chooses  $(y_w, y_h)$  to solve:

$$\max_{y_h, y_f} U\left(x, \frac{y_w}{a_w}, \frac{y_h}{a_h}\right) \tag{2}$$

s.t. 
$$x = y_h + y_w - T(y_w, y_h)$$
 (3)

Deriving the FOC and rearranging yields

$$MRS_{y_w,y_h} = \frac{\partial U/\partial y_h}{\partial U/\partial y_w} = \frac{a_w}{a_h} \frac{\partial U/\partial l_h}{\partial U/\partial l_w} = \frac{1 - \partial T(y_h, y_w)/\partial y_h}{1 - \partial T(y_h, y_w)/\partial y_w}.$$
 (4)

The tradeoff between  $y_w$  and  $y_h$  is not distorted (with respect to a first-best and/or laissez-faire outcome) when  $MRS_{y_w,y_h} = 1$ . This is of course always the case when there are no taxes at all. More interestingly, equation (4) shows that the tradeoff remains undistorted as long as  $\partial T(y_h, y_w)/\partial y_h = \partial T(y_h, y_w)/\partial y_w$ , i.e., when the marginal tax on labor income is the same for both spouses.<sup>5</sup> Based on the same arguments, we will say that the choice between  $y_w$  and  $y_h$  is distorted towards more  $y_h$  (resp.  $y_w$ ) when  $\partial T(y_h, y_w)/\partial y_w > \partial T(y_h, y_w)/\partial y_h$  (resp.  $\partial T(y_h, y_w)/\partial y_w < \partial T(y_h, y_w)/\partial y_h$ ).

An alternative view on these distortions consists in saying that the choice between  $y_w$  and  $y_h$  is distorted towards less  $y_w$  if couples who choose to decrease  $y_w$  pay less taxes for a given level of total before tax income  $GI = y_w + y_h$  that is when:<sup>6</sup>

$$\left. \frac{dT\left(y_{h}, y_{w}\right)}{dy_{w}} \right|_{y_{w}+y_{h}=GI} = \frac{\partial T\left(y_{h}, y_{w}\right)}{\partial y_{w}} - \frac{\partial T\left(y_{h}, y_{w}\right)}{\partial y_{h}} > 0$$

$$\left. \frac{dT\left(y_{h}, y_{w}\right)}{dy_{w}} \right|_{GI} = \frac{\partial T\left(y_{h}, y_{w}\right)}{\partial y_{w}} - \frac{\partial T\left(y_{h}, y_{w}\right)}{\partial y_{h}} < 0.$$

<sup>&</sup>lt;sup>4</sup>Which does not necessarily imply that all implementing tax functions are unitary.

<sup>&</sup>lt;sup>5</sup>When marginal taxes are different from zero, leisure-labor and/or domestic labor-market labor tradeoffs are distorted. However, the intra-family allocation of labor supply (as specified by problem (2)) remains undistorted when marginal tax rates are the same for both spouses.

<sup>&</sup>lt;sup>6</sup>Similarly, there will be a distortion towards less  $y_h$  in the  $(y_w, y_h)$  tradeoff when:

#### 3 The optimal tax function

We characterize the (constrained) Pareto efficient allocations that are obtained by maximizing a weighted sum of utilities subject to the resource constraint and the incentive compatibility constraints. The weight of a type i couple is denoted  $\alpha^i \pi^i$  with  $\alpha^i \geq 0$  and  $\sum_i \alpha^i = 1$ . For the remainder of the paper, we denote the utility function of a type i couple by  $U^i(x^i, y_w^i, y_h^i) = U(x^i, y_w^i/a_w^i, y_h^i/a_h^i)$ . Because types are private information the following incentive compatibility constraints apply for any  $i, j = 1, \ldots, N$ ,

$$U^{i} = U^{i}\left(x^{i}, y_{w}^{i}, y_{h}^{i}\right) \ge U^{ij} = U^{i}\left(x^{j}, y_{w}^{j}, y_{h}^{j}\right). \tag{5}$$

In words, couple i must not be able to achieve a (strictly) larger utility level by mimicking couple j, i.e., by consuming the consumption bundle designed for couple j.

Formally, a Pareto efficient allocation is the solution to the following problem:

$$\max_{x_z^i, y_w^i, y_f^i} \sum_{i=1}^N \alpha^i \pi^i U^i$$

$$\text{s.t } \sum_{i=1}^N \pi^i \left( y_w^i + y_h^i - x^i \right) \ge G$$

$$U^i \ge U^{ij} \ i, j = 1.....N$$

$$(6)$$

where G is the exogenous revenue requirement while  $U^i$  and  $U^{ij}$  are defined by (5).

Denoting the multipliers of constraints (6) and (7) by  $\mu$  and  $\lambda^{ij}$  respectively, one can write the Lagrangian expression as follows:

$$\Lambda = \sum_{i=1}^{N} \alpha^{i} \pi^{i} U^{i} + \mu \left[ \sum_{i=1}^{N} \pi^{i} \left( y_{w}^{i} + y_{h}^{i} - x^{i} \right) - G \right] + \sum_{i,j=1}^{N} \lambda^{ij} \left[ U^{i} - U^{ij} \right]$$

The first order conditions with respect to  $y_w^i$  and  $y_h^i$ , i = 1...N, are given by:

$$\frac{\partial \Lambda}{\partial y_w^i} = \left[ \alpha^i \pi^i + \sum_{i=1}^N \lambda^{ij} \right] \frac{\partial U^i}{\partial y_w^i} + \pi^i \mu - \sum_{j=1}^N \lambda^{ji} \frac{\partial U^{ji}}{\partial y_w^i} = 0$$
 (8)

$$\frac{\partial \Lambda}{\partial y_h^i} = \left[ \alpha^i \pi^i + \sum_{i=1}^N \lambda^{ij} \right] \frac{\partial U^i}{\partial y_h^i} + \pi^i \mu - \sum_{j=1}^N \lambda^{ji} \frac{\partial U^{ji}}{\partial y_h^i} = 0 \tag{9}$$

Denoting  $\gamma^i=\alpha^i\pi^i+\sum_{i=1}^N\lambda^{ij}$  and combining equations (8) and (9) yields:

$$\gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} MRS_{y_{w},y_{h}}^{i} + \gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_{w}^{i}} MRS_{y_{w},y_{h}}^{ji} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_{w}^{i}} = 0$$

where  $MRS_{y_w,y_h}^{ji} = \partial U^{ji}/\partial y_h^i/\partial U^{ji}/\partial y_w^i$ . After some rearrangements this yields:

$$MRS_{y_w,y_h}^{i} = \frac{\gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_{w}^{i}}}{\gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial Y_{w}^{i}} \frac{MRS_{y_w,y_h}^{ji}}{MRS_{y_w,y_h}^{i}}}$$
(10)

Combining (10) with (4) and rearranging then establishes the following proposition; see Appendix A.

**Proposition 1** (i) We have  $\partial T\left(y_{w}^{i}, y_{h}^{i}\right)/\partial y_{w}^{i} \gtrapprox \partial T\left(y_{w}^{i}, y_{h}^{i}\right)/\partial y_{h}^{i}$  if and only if

$$\sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_w^i} \left[ \frac{MRS_{y_w, y_h}^{ji}}{MRS_{y_w, y_h}^i} - 1 \right] \stackrel{\leq}{=} 0$$
(11)

(ii) A Pareto efficient allocation can be implemented by a unitary tax function  $T\left(y_w^i, y_h^i\right) = \widetilde{T}\left(y_w^i + y_h^i\right)$  if and only if condition (11) holds as equality for all couples  $i = 1, \dots N$ .

Proposition 1 provides a general condition under which a couple's tradeoff between the spouses' labor supplies should not be distorted; specifically this is true when the LHS of (11) is equal to zero. Otherwise, it ought to be distorted and the direction of the distortion is provided by (11). When the LHS of this condition is negative, w faces a higher marginal tax rate than h and the tradeoff is distorted towards more  $y_h$ . If it is negative, we have the opposite result. This condition is general in the sense that it is valid whatever the pattern of binding incentive constraints and for any welfare weights. The price to pay for this level of generality is that the condition involves endogenous variables. We shall show below that (11) reduces to a condition on the primitives of the model in special cases. In those cases the interpretation will also be facilitated. In the meantime let us have a look at the interpretation of the general condition.

To do this, let us first compare the choices of labor supplies,  $(y_w, y_h)$ , by couples i and j for a given level of gross income  $GI = y_w + y_h$ . Each couple chooses a pair  $(y_w, y_h)$  that lies at the point of tangency between indifference curves and the gross income line

i.e., where  $MRS_{y_w,y_h}^j = MRS_{y_w,y_h}^i = 1$ . Figure 1 illustrates this choice in the  $(y_h, y_w)$  plane where couples j and i choose a different combination of spouses' gross incomes. In the case that is depicted, the marginal rate of substitution between  $y_w$  and  $y_h$  is larger (in absolute value) for couple j than for couple i, so that it chooses a higher  $y_w$  and a lower  $y_h$ . Now assume that the incentive compatibility constraint preventing couple j to mimic couple i is binding and note that at the point  $(y_w^i, y_h^i)$  couple j has a steeper indifference curve than couple i. To make couple i's consumption bundle  $(y_w^i, y_h^i)$  less attractive for couple j, it is then desirable to distort the choice of couple i towards less  $y_w$  (moving to the right along the income line). In other words, a higher marginal tax on  $y_w^i$  would be desirable to relax an otherwise binding incentive compatibility constraint. Alternatively, when the marginal rate of substitution is lower (in absolute value) for couple j then it is desirable to distort the choice of couple i towards more i in the couple i then it is desirable to distort the choice of couple i towards more i in the couple i then it is desirable to distort the choice of couple i towards more i in the couple i then it is desirable to distort the choice of couple i towards more i in the couple i towards more i towards

So far we have concentrated on one pair of couples. However, the solution may well imply that several incentive constraints towards type i are binding. Condition (11) considers all couples j for which the incentive compatibility constraints towards the type i couple is binding i.e. all the j such that  $\lambda^{ji} > 0$ . For each binding incentive compatibility constraint, there is a desirable distortion on the  $(y_w^i, y_h^i)$  choice. As argued above, the sign of this distortion depends upon the difference between the two couples in the marginal rates of substitution. Proposition 1 states that the total distortion on couple i's  $(y_w^i, y_h^i)$  tradeoff depends upon a weighted sum of distortions imposed by each binding self-selection constraints in which i is the mimicked type.

Observe that a couple i such that  $\lambda^{ji} = 0$  for all j (if it exists) never faces a distortion (the LHS of (11)) is always equal to zero). This is the counterpart to the traditional no distortion at the top result in this multi-dimensional setting. For all other types i (with at least one  $\lambda^{ji} > 0$ ) the LHS of (11) may or may not be zero, depending on the marginal rates of substitution of the mimicker and the mimicked couples. A sufficient condition for this to be the case is that  $MRS^{ji}_{y_w,y_h} = MRS^i_{y_w,y_h}$  at the point  $(y^i_w, y^i_h)$  for all pairs of couples with  $\lambda^{ji} > 0$ . In words, this (sufficient) condition requires that all pairs of couples linked by a binding incentive constraint have the same marginal rate

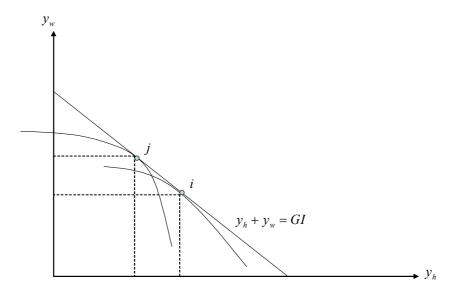


Figure 1: The  $(y_w, y_h)$  choice for a given level of gross income GI.

of substitution (at the labor supply bundle of the mimicked couple).

A more intuitive version of this condition, based solely on exogenous variables, can be obtained for specific classes of utility functions. The following proposition is established in Appendix B.

**Proposition 2** Assume couples utility functions are of the form

$$U(x,l) = u(x) - l_w^{\beta} - l_h^{\beta},$$
 (12)

where  $\beta \geq 1$ . Then, a sufficient condition to have  $\partial T(y_w^i, y_h^i)/\partial y_w^i = \partial T(y_w^i, y_h^i)/\partial y_h^i$  is:

$$\frac{a_w^j}{a_h^j} = \frac{a_w^i}{a_h^i} \text{ for all } i, j = 1...N.$$
(13)

In words, condition (13) requires that the ratio of the two spouses' productivities be the same for all couples. The underlying mating pattern thus implies a perfect correlation between the two productivities of the two spouses. In a society with assortative mating as opposed to random (or reverse) mating condition (13) could be verified. Some studies suggest that most industrial societies are moving towards assortative mating: couples are becoming more and more similar over time; see e.g., Rose (2001).

The case of iso-elastic utilities is further explored in the following two-types example. It provides a nice illustration and more significantly, it yields more precise results regarding the sign of the distortions.

#### 4 A two types example

Suppose there are only two types of couples in the economy. The couple 1 is characterized by higher productivities than couple 2, i.e.,  $a_w^1 \ge a_w^2$  and  $a_h^1 \ge a_h^2$ . Assume further that the incentive compatibility constraint preventing type 1 to mimic type 2 is binding i.e.  $\lambda_{12} > 0$ . In this case, there is no distortion for type 1. Furthermore, Proposition

<sup>&</sup>lt;sup>7</sup>This is equivalent to assume that  $\alpha^2$  is high enough in the objective of the government.

1 (i) is equivalent to

With iso-elastic disutility of labor, so that  $U\left(x,l\right)=u\left(x\right)-l_{w}^{\beta}-l_{h}^{\beta}$   $(\beta\geq1),$  one has:

$$\frac{MRS_{y_w,y_h}^2}{MRS_{y_w,y_h}^{12}} = \left(\frac{a_w^2/a_h^2}{a_w^1/a_h^1}\right)^{\beta} \tag{14}$$

Consequently, a necessary and sufficient condition to have a solution that can be implemented by a unitary tax function is that the ratio between the spouses productivities is the same for both types of couples. This is essentially just an illustration of Proposition 2. More interestingly, (14) implies that  $a_w^2/a_h^2 > a_w^1/a_h^1$  yields  $\partial T\left(y_w^2,y_h^2\right)/\partial y_w^2 < \partial T\left(y_w^2,y_h^2\right)/\partial y_h^2$ . In words, in the low productivity couple spouse w faces a lower marginal tax rate than spouse h, when the ratio between the productivities of w and h is larger in the mimicked couple than in the mimicking couple. Put differently, female labor supply would be encouraged (relative to the male labor supply) in the low productivity couple when the wife is relatively more productive in that household than in the high productivity couple. With the considered profile of the spouses productivity ratios such a distortion has a more significant impact on the utility of the mimicking couple than on that of the mimicked couple and, as explained in the previous section, the differential taxation of the spouses incomes relaxes a binding incentive constraint. Conversely,  $a_w^2/a_h^2 < a_w^1/a_h^1$  yields  $\partial T\left(y_w^2, y_h^2\right)/\partial y_w^2 > \partial T\left(y_w^2, y_h^2\right)/\partial y_h^2$  and we have exactly the opposite result (but the same intuition).

#### 5 Conclusion

Understanding the implications of optimal taxation theory for the fiscal treatment of couples is a big challenge. This paper is an attempt to explore one aspect of the problem. Specifically, we provide a general framework to study the intra-family labor allocation under an optimal nonlinear income tax schedule. Whether this allocation is distorted

or not depends upon the tax unit choice. The literature distinguishes between two "tax units": the couple vs the individual. It also considers three tax systems: joint taxation, individual taxation and selective taxation. The first corresponds to choosing the couple as the tax unit while the second and the third have the individual as the tax unit.

We focus on joint taxation and provide the conditions that lead to such a system. We consider first a general setting and then two more restricted frameworks. Not surprisingly, these conditions are rather restrictive. For instance, when the family utility function is separable and the labor disutility function is isoelastic, a necessary condition for a pure joint taxation is the equality of the ratio between the two earners' productivity across all couples. We also study how the spouses respective labor supply decisions are distorted when the condition does not hold. In particular, we show in a two-type example that the way this ratio varies has a direct impact on the now different marginal tax of the two spouses.

It is important to note that the restrictive character of the assumptions that imply joint taxation does not mean that the assumptions needed to obtain separate taxation are less restrictive.

While allowing a quite general framework, our analysis suffers from an important drawback namely that it is based on the so-called unitary approach. It is well known that this approach is usually not supported by the empirical evidence. In the future, we plan to study such problems within the framework of collective models initiated by Chiappori (1988).

### Appendix

#### A Proof of Proposition 1

Combining (4) and (10) yields

$$\frac{1 - \partial T\left(y_h^i, y_w^i\right) / \partial y_h^i}{1 - \partial T\left(y_h^i, y_w^i\right) / \partial y_w^i} = \frac{\gamma^i \frac{\partial U^i}{\partial y_w^i} - \sum_{j=1}^N \lambda^{ji} \frac{\partial U^{ji}}{\partial y_w^i}}{\gamma^i \frac{\partial U^i}{\partial y_w^i} - \sum_{j=1}^N \lambda^{ji} \frac{\partial U^{ji}}{\partial y_w^i} \frac{MRS_{y_w, y_h}^{ji}}{MRS_{y_w, y_h}^i}},$$

so that

$$\frac{\partial T\left(y_{w}^{i}, y_{h}^{i}\right) / \partial y_{w}^{i} \stackrel{\geq}{\geq} \partial T\left(y_{w}^{i}, y_{h}^{i}\right) / \partial y_{h}^{i} \Leftrightarrow}{\gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_{w}^{i}}} \stackrel{\geq}{\geq} 1.$$

$$\frac{\gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_{w}^{i}} \frac{MRS_{y_{w}, y_{h}}^{ji}}{MRS_{y_{w}, y_{h}}^{i}}} \stackrel{\geq}{\geq} 1.$$
(15)

Numerator and denominator of (15) are negative. Consequently this property is equivalent to

$$T\left(y_{w}^{i}, y_{h}^{i}\right) / \partial y_{w}^{i} \stackrel{\geq}{\geq} \partial T\left(y_{w}^{i}, y_{h}^{i}\right) / \partial y_{h}^{i} \Leftrightarrow$$

$$\gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial y_{w}^{i}} \stackrel{\leq}{\leq} \gamma^{i} \frac{\partial U^{i}}{\partial y_{w}^{i}} - \sum_{j=1}^{N} \lambda^{ji} \frac{\partial U^{ji}}{\partial Y_{w}^{i}} \frac{MRS_{y_{w}, y_{h}}^{ji}}{MRS_{y_{w}, y_{h}}^{i}}.$$

Simplifying and rearranging the last inequality establishes to Proposition 1.

#### B Proof of Proposition 2

When preferences are represented by (12) one has:

$$\begin{split} MRS_{y_w,y_h}^i &= \frac{\partial U^i/\partial y_h^i}{\partial U^i/\partial y_w^i} = \left(\frac{a_w^i}{a_h^i}\right)^\beta \left(\frac{y_h^i}{y_w^i}\right)^{\beta-1},\\ MRS_{y_w,y_h}^{ji} &= \frac{\partial U^{ji}/\partial y_h^i}{\partial U^{ji}/\partial y_w^i} = \left(\frac{a_w^j}{a_h^j}\right)^\beta \left(\frac{y_h^i}{y_w^j}\right)^{\beta-1}, \end{split}$$

so that

$$\frac{MRS_{y_w,y_h}^{ji}}{MRS_{y_w,y_h}^{i}} = \left(\frac{a_w^j/a_h^j}{a_w^i/a_h^i}\right)^{\beta}.$$

Consequently, it follows from Proposition 1, that  $a_w^j/a_h^j = a_w^i/a_h^i$  for all i, j = 1...N, implies  $MRS_{y_w,y_h}^{ji}/MRS_{y_w,y_h}^i/MRS_{y_w,y_h}^i - 1 = 0$  and  $\partial T\left(y_w^i, y_h^i\right)/\partial y_w^i = \partial T\left(y_w^i, y_h^i\right)/\partial y_h^i$ .

#### References

- [1] Apps, P. and R. Rees, 1988, Taxation and the household, *Journal of Public Economics*, 75, 355–369.
- [2] Apps, P. and R. Rees, 1999, Individual vs. Joint Taxation in Models with Household Production, *Journal of Political Economy*, 107, 393–403.
- [3] Blundell R. and T. MaCurdy, 1999, Labor Supply: A Review of Alternative Approaches, in O. Ashenfelter and D. Card (eds), Handbook of Labor Economics vol 3A, Elsevier Science B.V., Amsterdam.
- [4] Boskin, M., 1975, Efficiency aspects of the differentiated tax treatment of market and household economic activity, *Journal of Public Economics*, 4, 1–25.
- [5] Boskin M.J. and E. Sheshinski, 1983, Optimal Tax treatment of the Family: Married Couples, *Journal of Public Economics*, 20, 281–297.
- [6] Brett, C., 2006, Optimal nonlinear taxes for families, International Tax and Public Finance,
- [7] Chiappori P.-A., 1988, Rational Household Labor Supply, *Econometrica*, 56, 1,63–89.
- [8] Chiappori P.-A., B. Fortin and G. Lacroix, 2002, Household Labor Supply, Sharing Rule and the Marriage Market, *Journal of Political Economy*, 110, 1, 37–72.
- [9] Kleven H.J., 2004, Optimum Taxation and the Allocation of Time, Journal of Public Economics 88, 545–557.
- [10] Kleven H.J., C.T. Kreiner and E. Saez (2005), The Optimal Income Taxation of Couples, Manuscript.
- [11] Mirrlees, J A., 1971, An Exploration in the Theory of Optimal Income Taxation, Review of Economic Studies, 38, 175–208.

- [12] Rose, E., 2001, Marriage and assortative mating: how have the pattern changed?, University of Washington, unpublished.
- [13] Schroyen, F., (2003), Redistributive taxation and the household: the case of individual filings, *Journal of Public Economics*, 87, 2527–2547.

## **CESifo Working Paper Series**

(for full list see www.cesifo-group.de)

- 1940 Monika Bütler and Michel André Maréchal, Framing Effects in Political Decision Making: Evidence from a Natural Voting Experiment, March 2007
- 1941 Giacomo Corneo and Olivier Jeanne, A Theory of Tolerance, March 2007
- 1942 Qing Hong and Michael Smart, In Praise of Tax Havens: International Tax Planning and Foreign Direct Investment, March 2007
- 1943 Yin-Wong Cheung, Dickson Tam and Matthew S. Yiu, Does the Chinese Interest Rate Follow the US Interest Rate?, March 2007
- 1944 Panu Poutvaara and Mikael Priks, Unemployment and Gang Crime: Could Prosperity Backfire?, March 2007
- 1945 Burkhard Heer, On the Modeling of the Income Distribution Business Cycle Dynamics, March 2007
- 1946 Christoph A. Schaltegger and Lars P. Feld, Are Fiscal Adjustments less Successful in Decentralized Governments?, March 2007
- 1947 Giovanni Facchini, Marcelo Olarreaga, Peri Silva and Gerald Willmann, Substitutability and Protectionism: Latin America's Trade Policy and Imports from China and India, March 2007
- 1948 C. Mirjam van Praag and Bernard M. S. van Praag, The Benefits of Being Economics Professor A (and not Z), March 2007
- 1949 Astrid Hopfensitz and Frans van Winden, Dynamic Choice, Independence and Emotions, March 2007
- 1950 Guglielmo Maria Caporale and Luis A. Gil-Alana, A Multivariate Long-Memory Model with Structural Breaks, March 2007
- 1951 Mattias Ganslandt and Keith E. Maskus, Wholesale Price Discrimination and Parallel Imports, March 2007
- 1952 Michela Redoano, Fiscal Interactions Among European Countries. Does the EU Matter?, March 2007
- 1953 Stefan C. Wolter, Rémy Hübschi and Matthias Müller, Push or Pull? An Empirical Analysis of the Demand for Individual Project Grants from the Swiss National Science Foundation, March 2007

- 1954 Scott Alan Carson, African-American and White Inequality in the American South: Evidence from the 19<sup>th</sup> Century Missouri State Prison, March 2007
- 1955 Peter Egger, Marko Koethenbuerger and Michael Smart, Do Fiscal Transfers Alleviate Business Tax Competition? Evidence from Germany, March 2007
- 1956 Panu Poutvaara and Lars-H. R. Siemers, Smoking and Social Interaction, March 2007
- 1957 Stephan Danninger and Fred Joutz, What Explains Germany's Rebounding Export Market Share?, March 2007
- 1958 Stefan Krasa and Mattias Polborn, Majority-efficiency and Competition-efficiency in a Binary Policy Model, March 2007
- 1959 Thiess Buettner and Georg Wamser, Intercompany Loans and Profit Shifting Evidence from Company-Level Data, March 2007
- 1960 Per Pettersson-Lidbom and Mikael Priks, Behavior under Social Pressure: Empty Italian Stadiums and Referee Bias, April 2007
- 1961 Balázs Égert and Carol S. Leonard, Dutch Disease Scare in Kazakhstan: Is it real?, April 2007
- 1962 Paul De Grauwe and Pablo Rovira Kaltwasser, Modeling Optimism and Pessimism in the Foreign Exchange Market, April 2007
- 1963 Volker Grossmann and Thomas M. Steger, Anti-Competitive Conduct, In-House R&D, and Growth, April 2007
- 1964 Steven Brakman and Charles van Marrewijk, It's a Big World After All, April 2007
- 1965 Mauro Ghinamo, Paolo M. Panteghini and Federico Revelli, FDI Determination and Corporate Tax Competition in a Volatile World, April 2007
- 1966 Inés Macho-Stadler and David Pérez-Castrillo, Optimal Monitoring to Implement Clean Technologies when Pollution is Random, April 2007
- 1967 Thomas Eichner and Ruediger Pethig, Efficient CO<sub>2</sub> Emissions Control with National Emissions Taxes and International Emissions Trading, April 2007
- 1968 Michela Redoano, Does Centralization Affect the Number and Size of Lobbies?, April 2007
- 1969 Christian Gollier, Intergenerational Risk-Sharing and Risk-Taking of a Pension Fund, April 2007
- 1970 Swapan K. Bhattacharya and Biswa N. Bhattacharyay, Gains and Losses of India-China Trade Cooperation a Gravity Model Impact Analysis, April 2007
- 1971 Gerhard Illing, Financial Stability and Monetary Policy A Framework, April 2007

- 1972 Rainald Borck and Matthias Wrede, Commuting Subsidies with two Transport Modes, April 2007
- 1973 Frederick van der Ploeg, Prudent Budgetary Policy: Political Economy of Precautionary Taxation, April 2007
- 1974 Ben J. Heijdra and Ward E. Romp, Retirement, Pensions, and Ageing, April 2007
- 1975 Scott Alan Carson, Health during Industrialization: Evidence from the 19<sup>th</sup> Century Pennsylvania State Prison System, April 2007
- 1976 Andreas Haufler and Ian Wooton, Competition for Firms in an Oligopolistic Industry: Do Firms or Countries Have to Pay?, April 2007
- 1977 Eckhard Janeba, Exports, Unemployment and the Welfare State, April 2007
- 1978 Gernot Doppelhofer and Melvyn Weeks, Jointness of Growth Determinants, April 2007
- 1979 Edith Sand and Assaf Razin, The Role of Immigration in Sustaining the Social Security System: A Political Economy Approach, April 2007
- 1980 Marco Pagano and Giovanni Immordino, Optimal Regulation of Auditing, May 2007
- 1981 Ludger Woessmann, Fundamental Determinants of School Efficiency and Equity: German States as a Microcosm for OECD Countries, May 2007
- 1982 Bas Jacobs, Real Options and Human Capital Investment, May 2007
- 1983 Steinar Holden and Fredrik Wulfsberg, Are Real Wages Rigid Downwards?, May 2007
- 1984 Cheng Hsiao, M. Hashem Pesaran and Andreas Pick, Diagnostic Tests of Cross Section Independence for Nonlinear Panel Data Models, May 2007
- 1985 Luis Otávio Façanha and Marcelo Resende, Hierarchical Structure in Brazilian Industrial Firms: An Econometric Study, May 2007
- 1986 Ondřej Schneider, The EU Budget Dispute A Blessing in Disguise?, May2007
- 1987 Sascha O. Becker and Ludger Woessmann, Was Weber Wrong? A Human Capital Theory of Protestant Economic History, May 2007
- 1988 Erkki Koskela and Rune Stenbacka, Equilibrium Unemployment with Outsourcing and Wage Solidarity under Labour Market Imperfections, May 2007
- 1989 Guglielmo Maria Caporale, Juncal Cunado and Luis A. Gil-Alana, Deterministic versus Stochastic Seasonal Fractional Integration and Structural Breaks, May 2007
- 1990 Cláudia Costa Storti and Paul De Grauwe, Globalization and the Price Decline of Illicit Drugs, May 2007

- 1991 Thomas Eichner and Ruediger Pethig, Pricing the Ecosystem and Taxing Ecosystem Services: A General Equilibrium Approach, May 2007
- 1992 Wladimir Raymond, Pierre Mohnen, Franz Palm and Sybrand Schim van der Loeff, The Behavior of the Maximum Likelihood Estimator of Dynamic Panel Data Sample Selection Models, May 2007
- 1993 Fahad Khalil, Jacques Lawarrée and Sungho Yun, Bribery vs. Extortion: Allowing the Lesser of two Evils, May 2007
- 1994 Thorvaldur Gylfason, The International Economics of Natural Resources and Growth, May 2007
- 1995 Catherine Roux and Thomas von Ungern-Sternberg, Leniency Programs in a Multimarket Setting: Amnesty Plus and Penalty Plus, May 2007
- 1996 J. Atsu Amegashie, Bazoumana Ouattara and Eric Strobl, Moral Hazard and the Composition of Transfers: Theory with an Application to Foreign Aid, May 2007
- 1997 Wolfgang Buchholz and Wolfgang Peters, Equal Sacrifice and Fair Burden Sharing in a Public Goods Economy, May 2007
- 1998 Robert S. Chirinko and Debdulal Mallick, The Fisher/Cobb-Douglas Paradox, Factor Shares, and Cointegration, May 2007
- 1999 Petra M. Geraats, Political Pressures and Monetary Mystique, May 2007
- 2000 Hartmut Egger and Udo Kreickemeier, Firm Heterogeneity and the Labour Market Effects of Trade Liberalisation, May 2007
- 2001 Andreas Freytag and Friedrich Schneider, Monetary Commitment, Institutional Constraints and Inflation: Empirical Evidence for OECD Countries since the 1970s, May 2007
- 2002 Niclas Berggren, Henrik Jordahl and Panu Poutvaara, The Looks of a Winner: Beauty, Gender, and Electoral Success, May 2007
- 2003 Tomer Blumkin, Yoram Margalioth and Efraim Sadka, Incorporating Affirmative Action into the Welfare State, May 2007
- 2004 Harrie A. A. Verbon, Migrating Football Players, Transfer Fees and Migration Controls, May 2007
- 2005 Helmuth Cremer, Jean-Marie Lozachmeur and Pierre Pestieau, Income Taxation of Couples and the Tax Unit Choice, May 2007