Comprehensive or Separate Income Tax?
A Sufficient Statistics Approach

Very Preliminary
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Etienne LEHMANN*
CRED(TEPP), Université Panthéon-Assas Paris II
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Abstract

In this paper, I investigate how to tax the different sources of income of taxpayers. I consider an optimal nonlinear income tax model with many sources of income. I first exhibit a specification where the optimal tax system consists in a nonlinear schedule that applies to the sum of all income - a comprehensive income tax system - and another specification where the optimal tax system consists in a nonlinear schedule specific to each income - a separate income tax system. In the more general environment I specialize the tax schedule to be combination of these two polar systems: the tax system is restricted to be the sum of a comprehensive personal income tax schedule and of income specific tax schedules, I derive an optimal ABC formula for each of these schedules. I also derive a condition expressed in terms of empirically meaningful sufficient statistics under which decreasing the indexation of the personal income tax base on one income and compensating the revenue loss with a lump-sum or a proportional increase in the taxation of that income is socially desirable.

Keywords: Nonlinear Income Taxation. Dual Income Tax, Comprehensive Income Tax

I Introduction

Taxpayers receive different kinds of incomes such as labor income, interest income, dividends, capital gains or losses, business income, rents or imputed rents. There exist two polar system to tax these different incomes. Under a comprehensive income tax system, tax liability is a function of the sum of all of these incomes. Conversely, under a separate income tax system, each income is taxed according to an income-specific schedule. A particular case of separate income tax system is the dual income tax where capital income is excluded from the personal income tax base and taxed under a specific proportional schedule. Sweden in 1991, Norway in 1992, Finland in 1993, Spain in 2006 and Germany moved to a dual tax system by exiting a large part of their capital income from the personal income tax base. Denmark has now a mixed system (Kleven and Schultz, 2014). In France, dividends were taxed in a dual way from 2007 to

* CRED, Université Panthéon-Assas Paris II, 12 Place du Panthéon, 75 234 Paris Cedex 05, France, email: elehmann@u-paris2.fr. Homepage: http://cred.u-paris2.fr/Lehmann.
2012, and France has now opted for dual taxation of capital income since 2017. In Netherlands, the 2001 reform moved from the personal income tax from a comprehensive system to a separate system where incomes financial wealth are exited from the personal income tax base and wealth taxed applies to financial wealth (Zoutman, 2018).

There exist informal arguments in favor or against the move to a separate income tax system (e.g. Boadway (2004)).

- On the one hand, a separate income tax system enables the government to shift the burden of taxation to the least responsive tax base. I refer to this argument as the Ramsey (1927) argument because it focuses on the best way to shift the burden of redistribution across the different tax bases, just as the Ramsey (1927) optimal formula describes the optimal way to shift the burden of taxation across the different commodities. In practice, thanks to dual taxation, Nordic countries succeed in keeping a very progressive personal income tax with high marginal tax rates without harming saving and investment.\(^1\)

- On the other hand, a separate income tax system triggers incentives for income shifting, especially for business and self-employed incomes.

- Moreover, by reducing capital tax rate and keeping high tax rates on labor earnings, moving to a separate income tax benefit high capital earners which is frequently viewed as unfair.

While these reforms generate huge controversies in policy-advising arena and many empirical evaluations, the arguments in favor or against a separate income tax system remain informal. In this paper, I develop an optimal tax model with different income to investigate when a (more) separate, a (more) comprehensive tax schedule is desirable.

I start in Sections III and IV by providing two specialization of the model where I can characterize the tax schedule that decentralizes the allocation that solves the optimal multidimensional screening problem.

In Section III, I assume individuals are endowed with weakly separable preferences. This very specific assumption implies that all taxpayers make the same decisions when deciding how to split their efforts across the different tax bases to get a given level of total income. In such a case, I show that a comprehensive tax schedule is sufficient to decentralize the optimal allocation. The argument is similar to the argument in Atkinson and Stiglitz (1976) against commodity taxation: distorting the choice of efforts across the different tax bases is useless because this does not relax the equity-efficiency trade off under weakly separable preferences.

I then consider in Section IV a specialization where unobserved heterogeneity is one-dimensional and preferences are quasilinear and additively separable. Under these specific assumptions, as high labor income earners are also high capital income earners, whether the burden of taxation

\(^1\)Moreover, a dual income tax system is much simpler to enforce as the tax liability of one income does no longer depend on the other incomes. Enforcement costs is a frequent argument in practice that is not considered in the present paper.
should be imposed on labor or on capital is solely an efficient concern, without any equity implication. The one dimensional assumption thus ensures the validity of the above-mentioned Ramsey (1927) argument. In such a situation, the government wants to adapt the marginal tax rate specific to each income to the tax responsiveness specific to this tax base. Moving away from the comprehensive income tax is then necessary to adjust the marginal tax base to its responsiveness. The assumptions of quasilinear and additively separable preferences then guarantees the separate income tax system is sufficient to decentralize the optimal allocation.

These two specializations are much too specific to be empirically plausible. They are useful to formalize under which conditions the pros and cons of each polar system are valid. They are also useful to show that none of these two polar system is generically optimal. Turning to the more general case, to bypass the technical difficulty of multidimensional screening (Mirrlees, 1976, Golosov, Tsyvinski, and Werquin, 2014, Renes and Zoutman, 2017, Spiritus, 2017), I restrict in Section V the tax schedules to be the sum of a comprehensive personal income tax schedule $T_0(\cdot)$ and of $n$ income specific tax schedules (see Equations (8) and (9) below). While theoretically restrictive, this assumption approximate fairly well most of actual tax systems in OECD. Moreover, most of tax reforms on policymakers’ agenda can be considered within the class of tax schedules that I consider. I then obtain two important results.

First, I derive optimal marginal tax rate formulas which are specific to each income (including the comprehensive taxable income), See Equation (29). These formulas extend the formulas of Diamond (1998) and Saez (2001) for the existence of different incomes. It clarifies that cross base effects have to be taken into account. This is because a change in the marginal tax rate on one income also triggers responses of the other incomes, which in turn affect tax revenue.

Second, I investigate the effect of a reform that changes the indexation of the personal taxable income on a given income. Such a reform is an incremental move towards a more separate or a more comprehensive tax system. On the top of mimicking an uncompensated change in the marginal tax rate, such a reform also affects the personal income tax base, which in turns change the marginal tax rate associated to each tax base, which finally induces compensated responses. I then consider the effects of a reform that consists in marginally exiting an income from the personal income tax base and by compensating the loss in tax revenue by a proportional tax on this income. Such incremental tax reform is typically the way policymakers thinks about financing reforms towards a more separate income tax system. If the personal income tax schedule was linear, such effect would be neutral. Conversely, when the personal income schedule is progressive, I derive a formula that states under which conditions in terms of empirically meaningful sufficient statistics such a reform is socially desirable.

**Literature review to be added (very preliminary text)**

This under-progress paper is organized as follows. The model is presented in Section II. Section III describes a case where the optimal tax schedule is comprehensive. Section IV describes a case where the optimal tax schedule is separate. Finally, Section V consider in the more gen-
eral case the effects of incremental reforms towards a more separate or a more comprehensive tax system.

II The Economy

II.1 Taxpayers

The economy is populated by a unit mass of taxpayers characterized by different types denoted \( w \) belonging to the type space \( W \). Individuals take \( n \geq 2 \) different actions, which are costly to them. Each action generates a specific income denoted \( y_i \), which is observable by the government. For instance, \( y_1 \) can be salary income, \( y_2 \) business income, \( y_3 \) dividends, etc. Let: \( y = (y_1, ..., y_n) \) denote the vector of incomes or tax bases earned by a taxpayer. The preference of individuals of type \( w \) over after-tax income \( c \) (hereafter consumption) and tax base \( y \) is described by the utility function \( U : (c, y; w) \rightarrow \mathbb{R} \), which is assumed twice continuously differentiable over \( \mathbb{R}^{n+1} \times W \). Utility increases in consumption so \( U_y > 0 \), decreases in efforts, thereby in income, so \( U_y < 0 \). Let:

\[
S^i(c, y; w) \triangleq - \frac{U_y(c, y; w)}{U_c(c, y; w)}
\]

(1)

denote the marginal rate of substitution between the \( i^{th} \) income and consumption. I assume that indifference curves are convex. This implies that the matrix\(^2\) \( S^i + S^i (S^i)^{-1} \) is positive definite (see Appendix A).

Types are distributed according to the continuously differentiable density function \( f : w \mapsto f(w) \), which is defined over the convex type space \( W \). Unless otherwise specified, types correspond to \( n \geq 2 \) different characteristics denoted \( w_1, ..., w_n \), so \( w = (w_1, ..., w_n) \). The type space is denoted \( W \) and is a convex.

The government imposes a tax schedule \( T : y = (y_1, ..., y_n) \mapsto T(y_1, ..., y_n) \) that depends on each of these incomes. Hence, the after-tax income \( c \) of a taxpayer earning tax bases \( y \) is:

\[
c = \sum_{i=1}^n y_i - T(y_1, ..., y_n).
\]

Taxpayer of type \( w \) solves:

\[
U(w) \triangleq \max_{y=(y_1, ..., y_n)} U \left( \sum_{k=1}^n y_k - T(y_1, ..., y_n), y; w \right)
\]

(2)

I assume (see Assumption 1 discussed in II.3) that for each type \( w \in W \), this program admits a single solution denoted \( Y(w) = (Y_1(w), ..., Y_n(w)) \). Individuals of type \( w \) consume \( C(w) = \sum_{i=1}^n Y_i(w) - T(Y(w)) \) and enjoy utility level \( U(w) = U(C(w), Y(w); w) \). The first order-conditions are:

\[
\forall i \in \{1, ..., n\} : 1 - T_{yi}(Y(w)) = S^i(C(w), Y(w); w)
\]

(3)

\(^2\)I use notation \( [A_{ij}]_{i,j} \) to denote a square matrix of size \( n \) whose term of row \( i \) and column \( j \) is \( A_{ij} \). Superscript \( T \) denotes the transpose operator \( [A_{ij}]_{i,j}^T = [A_{ji}]_{i,j} \). Matrix \( [A_{ij}]_{i,j}^{-1} \) is the inverse of matrix \( [A_{ij}]_{i,j} \) and "·" denotes the matrix product.
Finally, \( h(y) \) denotes the joint density of tax bases \( y = (y_1, ..., y_n) \), while for each type of income, \( h_i(y_i) \) denotes the unconditional density of the \( i^{th} \) income.

II.2 Government

The government faces the following budget constraint:

\[
E \leq \mathcal{B} \overset{\text{def}}{=} \int_{w \in W} T(Y(w)) \ f(w) \ dw \tag{4}
\]

where \( \mathcal{B} \) stands for the tax revenue and where \( E \geq 0 \) is an exogenous amount of public expenditure to finance. The government’s objective sums an increasing transformation \( \Phi \) of taxpayers’ individual utility \( U(w) \) that may be concave and type-dependent:

\[
\mathcal{O} \overset{\text{def}}{=} \int_{w \in W} \Phi(U(w); w) \ f(w) \ dw \tag{5}
\]

When the government is utilitarian, the social transformation is \( \Phi(U, w) = U \) and is linear. When the government has weighted utilitarian preferences, the social transformation takes the form \( \Phi(U, w) = \gamma(w) \ U \). When the government has Bergson-Samuelsonian preferences, the social transformation does not depend on type and is concave in \( U \).

There are different specialization of tax schedules that will be considered in this paper.

Comprehensive Income Tax system

The tax schedule is said to be comprehensive if it takes the form: \( T(y) = T(\sum_{k=1}^{n} y_k) \) where \( T(\cdot) \) is defined on \( \mathbb{R}_+ \). The marginal tax rate on each income is then identical, so the first-order conditions (3) simplify to:

\[
1 - T_i'\left( \sum_{k=1}^{n} Y_k(w) \right) = S^1(C(w), Y(w); w) = ... = S^n(C(w), Y(w); w) \tag{6}
\]

In particular, the marginal rate of substitution \( \frac{\partial U_i}{\partial y_j} = S^i/S^j \) between the \( i^{th} \) and the \( j^{th} \) income is equal to one and is unaffected by taxation under a comprehensive income tax schedule. In other words, the comprehensive tax system does not distort how taxpayers shift their effort among the different tax bases.

Separate Income tax system

The tax schedule is said to be separate if it takes the form: \( T(y) = \sum_{k=1}^{n} T_k(y_k) \) where the \( T_k(\cdot) \) schedules are defined on \( \mathbb{R}_+ \). The marginal tax rate on each income then depends only on this income (i.e. \( T_{y_i y_j} = 0 \) if \( i \neq j \)), so the first-order conditions (3) become:

\[
\forall i \in \{1, ..., n\} \quad 1 - T_i'(Y_i(w)) = S^i(C(w), Y(w); w) \tag{7}
\]

In other words, with a separate income system, the distortions induced by the tax system on each tax base are independent.
Mixed tax system

I also consider a mixed tax system where the tax schedule is assumed to be the sum of a personal income tax schedule $T_0(\cdot)$ and of $n$ income specific tax schedules $T_i(\cdot)$:

$$\mathcal{T}(y) = T_0\left(\sum_{k=1}^n a_k y_k\right) + \sum_{k=1}^n T_k(y_k) \quad (8)$$

The personal income tax schedule $T_0(\cdot)$ depends on the personal income tax base or taxable income denoted $y_0$ and I denote $Y_0(w) = \sum_{k=1}^n a_k Y_k(w)$. Not all incomes are included in the personal income tax base, and not all income are necessarily fully included in the personal income tax base. For instance, in most OECD countries, it is not primary labor income paid by employers that enters the personal income tax base but labor income after the payment of (employers) social security contributions. Therefore, if $y_1$ denote primary labor earnings, $a_1 y_1$ denotes taxable labor earnings net of payroll taxes. Similarly, when dividends are included in the personal income tax base, these dividends have previously been taxed though corporate taxation. Hence, if $y_2$ denotes the primary profits earned by a taxpayer, $a_2 y_2$ denotes taxable dividends, etc. These are the reasons why I consider that the personal income tax base is defined by:

$$y_0 \overset{\text{def}}{=} \sum_{k=1}^n a_k y_k \quad (9)$$

where each $a_i$ is a policy instruments that captures how much taxable income $y_0$ depends on the $i^{th}$ income. Each $a_i$ takes a value between 0 and 1.\(^3\)

Moreover, the tax system is also made of $n$ income-specific tax schedules $T_i(\cdot)$. These schedules add taxes paid by firms and by households on a given tax base.

Under the tax schedule (8), the marginal tax rate on the $j^{th}$ income adds the marginal tax rate $T'_j(y_j)$ of the schedule specific to this income plus $a_j$ times the marginal tax rate $T'_0(y_0)$ of the personal income tax schedule:

$$\mathcal{T}_y(y) = T'_j(y_j) + a_j T'_0\left(\sum_{k=1}^n a_k y_k\right) \quad (10)$$

Therefore all incomes affects the $j^{th}$ marginal tax rate through the determination of the taxable income $y_0$ in (9).

While restrictive, the form of tax schedules in (8) approximate fairly well most of tax systems in OECD economies. It includes the specific case where the tax schedule is purely comprehensive, in which case $a_1 = \ldots = a_n = 1$ and for all $i$, $y_i \mapsto T_i(y_i) \equiv 0$ and the case where the tax schedule is purely separate, in which case $y_0 \mapsto T_0(y_0) \equiv 0$.

\(^3\)There is a normalization issue as for any $\lambda$, one can reproduce the same personal income tax with parameter $\tilde{a}_i = a_i \lambda$ and personal income tax schedule $y \mapsto \tilde{T}(\sum_{k=1}^n \tilde{a}_k y_k)$ defined by $y_0 \mapsto \tilde{T}(y_0) \overset{\text{def}}{=} T_0(y_0/\lambda)$.
II.3 Responses to tax reforms

To analyze the consequences of infinitesimal tax reforms I follow the tax perturbation approach of Golosov, Tsyvinski, and Werquin (2014). This consists in considering various one-dimensional families of perturbed tax schedules called a perturbation.

**Definition 1.** A tax perturbation is a twice continuously differentiable mapping \((y, x) \mapsto \tilde{T}(y, x)\) defined over \(\mathbb{R}^n_+ \times I\), where \(x\) denotes the algebraic magnitude of a tax reform and \(I\) is an open interval containing 0 such that:

- For all \(y \in \mathbb{R}^n_+\), one has \(\tilde{T}(y, 0) = T(y)\).
- After a tax reform of magnitude \(x\), taxpayers face the tax schedule \(y \mapsto \tilde{T}(y, x)\)

There are different examples of tax perturbations that are of particular interest. First, the lump-sum tax perturbation:

\[
\tilde{T}(y, x) = T(y) - x
\]

(11a)

consists in a lump-sum transfer \(x\) to every taxpayers.

Second, the compensated tax perturbation of the \(j\)th marginal tax rate at tax base \(Y(w)\):

\[
\tilde{T}(y, x) = T(y) - x (y_j - Y_j(w))
\]

(11b)

consists in increasing by \(x\) the \(j\)th marginal net of tax rate \(1 - T_{y_j}\), while leaving unchanged tax liability at \(y\). Such a reform is compensated at tax base \(Y(w)\) because tax liability is unchanged at \(y = Y(w)\), whatever the magnitude \(x\).

The uncompensated tax perturbation of the \(j\)th marginal tax rate:

\[
\tilde{T}(y, x) = T(y) - x y_j
\]

(11c)

consists in increasing by \(x\) the \(j\)th marginal net of tax rate \(1 - T_{y_j}\) without any lump sum compensation.

More generally, a tax perturbation in the direction \(R : y \mapsto R(y)\) is defined by:

\[
\tilde{T}(y, x) = T(y) - x R(y)
\]

(11d)

Finally, a tax perturbation of the \(i\)th tax base is defined by:

\[
\tilde{T}(y, x) = T(y_1, ..., y_{i-1}, (1 + x)y_i, y_{i+1}, ..., y_n)
\]

(11e)

For each tax perturbation, we want to compute the derivative of economic magnitude with respect to \(x\) at \(x = 0\), i.e. for any economic variable \(X\), computing

\[
\left. \frac{\partial X}{\partial x} \right|_{x=0} \equiv \lim_{x \to 0} \frac{X|_{\tilde{T}(x)} - X|_{T(x)}}{x}
\]

---

4See also Hendren (2017). An heuristic version of the tax perturbation approach has been exposed by Piketty (1997) and Saez (2001). An earlier application to linear commodity taxation is exposed in Christiansen (1981).
This notation is obviously meaningful only once the tax perturbation $\tilde{T}(\cdot, \cdot)$ behind is made explicit. To compute such derivatives, we want to apply the implicit function theorem to the first-order conditions in (3). We thus consider only tax schedules that verifies the following assumption.\footnote{Hendren (2017) assumes instead that government’s income $B$ is differentiable in $x$, which enables some “jumping responses” for zero measure of taxpayers. Golosov, Tsyvinski, and Werquin (2014) assumes that for each type $w$, $Y(w)$ is Lipschitz continuous in $x$.}

**Assumption 1.** The tax schedule $y \mapsto T(y)$ is such that:

- $i$) The tax schedule is twice continuously differentiable.
- $ii$) The second-order condition holds strictly, that is matrix $\left[ S_i y_j + S_j y_i + T_{y y} \right]_{i,j}$ is positive definite.
- $iii$) For each type $w \in W$, program (2) admits a single global maximum.

Part $i$) of Assumption 1 ensures that first-order conditions (3) are differentiable in tax base $y$. It in particular rules out kinks, thereby bunching.\footnote{In practice, most of real world tax codes are made of different piecewise linear tax schedules with kinks between two consecutive brackets (A noticeable exception being the personal income tax schedule in Germany). In theory, these kinks should induce bunching or gap in the corresponding income distribution. In reality, bunching at convex kink points are less frequent than theoretically expected (see however Saez (2010) which can be viewed as a counterexample) and gaps in the income distributions at concave kink points have not been documented empirically, to the best of my knowledge. One interpretation is very low behavioral elasticities. Another explanation that is much more plausible to me is that taxpayers do not optimize with respect to actual tax schedules, but with respect to smooth approximation of actual tax schedules (for instance $y \mapsto \int T(y + u) \, d \Psi(u)$ where $u$ is an $n$-dimensional random shock on incomes with joint CDF $\Psi$) which do verify part $i$) of Assumption 1.}

Parts $i)$ $ii)$ of Assumption 1 ensures that the implicit function theorem can be applied to first-order conditions (3) to ensure that each local maximum of $y \mapsto \mathcal{U}(\sum_{k=1}^{n} y_k - T(y), y; w)$ is differentiable in type $w$ and in the magnitude $x$ of a tax perturbation. However, if this mapping admits different global maximum among which a tax payer is indifferent, a small tax reform may trigger a jump of taxpayers with type very close to $w$ from a bundle close to one of this maximum to a bundle close to another global maximum. Such jumping response prevents $w \mapsto Y(w)$ from being differentiable in the magnitude of the tax perturbation and in types. Part $iii)$ of Assumption 1 is precisely intended to prevent this kind of “jumping” behavior.

Because the indifference curves are convex (See Appendix A), Assumption 1 is automatically satisfied when the tax schedule is linear, or when the tax schedule is weakly concave. It is also satisfied when the tax schedule is not “too” convex, so that $y \mapsto \sum_{k=1}^{n} y_k - T(y)$ is less convex than the indifference curve with which it has a tangency point in the $(y, c)$-space (so that Part $ii)$ of Assumption 1 is satisfied) and that this indifference curve is strictly above $y \mapsto \sum_{k=1}^{n} y_k - T(y)$ for all other $y$ (so that Part $iii)$ of Assumption 1 is satisfied). In the same spirit than the first-order mechanism design approach of Mirrlees (1971, 1976), we presume the optimal tax schedule verifies Assumption 1 and derive optimality conditions under this presumption. This presumption has then to be checked ex-post.

We can then define behavioral responses. Let then denote by $\frac{\partial Y_i(w)}{\partial \rho}$ the behavioral responses with respect to the lump sum tax perturbation defined in (11a). Let $\frac{\partial Y_i(w)}{\partial \tau_j}$ denote the compensated responses with respect to the compensated tax perturbation with respect to the $j$th
income at tax base $y = Y(w)$ as defined by Equation (11b). Note that these responses are total in the sense that they take into account that the nonlinearity of the tax schedule trigger further changes in marginal tax rates that trigger in turn further behavioral responses. Appendix B shows that the matrix of compensated responses is given by:

$$\left[ \frac{\partial Y_i}{\partial \tau_j} \right]_{ij} = \left( \left[ S_{yi}^i + S_{yi}^iS_{yi}^i + \tau_{yi} \right]_{ij} \right)^{-1}$$

(12)

and is thereby symmetric, so that $\frac{\partial Y_i}{\partial \tau_i} = \frac{\partial Y_i}{\partial \tau_j}$. Importantly, this matrix is generically not diagonal so cross base responses (i.e. $\frac{\partial Y_i}{\partial \tau_j}$ for $i \neq j$) can generically not be ruled out. The vector of income responses is given by:

$$\left( \frac{\partial Y_i}{\partial \rho} \right)^T = -\left( \left[ S_{yi}^i + S_{yi}^iS_{yi}^i + \tau_{yi} \right]_{ij} \right)^{-1} \cdot \left( S_{1y}^1, ..., S_{ny}^n \right)^T$$

(13)

If the $i^{th}$ income is a normal bad, one has $\frac{\partial Y_i}{\partial \rho} < 0$. Applying the Slutsky relation, the uncompensated response of the $i^{th}$ income to the $j^{th}$ net-of-marginal tax rate is given by:

$$\frac{\partial Y_i^u(w)}{\partial \tau_j} = \frac{\partial Y_i(w)}{\partial \tau_j} + Y_j(w) \frac{\partial Y_i(w)}{\partial \rho}$$

(14)

A tax perturbation affects the first-order conditions (3) through changes in marginal net of tax rates $1 - \tau_{yi}$, which trigger compensated responses, and through the change in tax liability, which triggers income response. Appendix B shows that the behavioral response of the $i^{th}$ income to a tax perturbation is therefore given by:

$$\left. \frac{\partial Y_i(w)}{\partial x} \right|_{x=0} = -\sum_{j=1}^n \frac{\partial Y_i(w)}{\partial \tau_j} \left. \frac{\partial \tilde{T}_{yi}(Y(w),0)}{\partial x} \right|_{x=0} - \left. \frac{\partial Y_i(w)}{\partial \rho} \frac{\partial \tilde{T}(Y(w),0)}{\partial x} \right|_{x=0}$$

(15)

The tax liability response of a given type of individual can be decomposed into mechanical effects, absent any change in tax base, and behavioral effects induced by the responses described in (15):

$$\left. \frac{d\tilde{T}(Y(w),x)}{dx} \right|_{x=0} = \left. \frac{\partial \tilde{T}(Y(w),x)}{\partial x} \right|_{x=0} + \sum_{i=1}^n T_{yi}(Y(w)) \left. \frac{\partial Y_i(w)}{\partial x} \right|_{x=0}$$

(16)

Combining the latter Equation with (15), the effect of a tax perturbation on government’s revenue (4) is given by:

$$\left. \frac{\partial \mathcal{R}}{\partial x} \right|_{x=0} = \int_{w \in W} \left\{ \left[ 1 - \sum_{i=1}^n T_{yi}(Y(w)) \frac{\partial Y_i(w)}{\partial \rho} \right] \frac{\partial \tilde{T}(Y(w),0)}{\partial x} \right. - \sum_{1 \leq i,j \leq n} T_{yi}(Y(w)) \left. \frac{\partial Y_i(w)}{\partial \tau_j} \frac{\partial \tilde{T}_{yi}(Y(w),0)}{\partial x} \right|_{x=0} \right\} f(w)dw$$

(17)

\(^7\)Consider for instance the case where preferences are quasilinear and additively separable, so that $\mathcal{U}(c, y; w) = c - \sum_{k=1}^n v^k(y_k; w)$. Then, matrix $\left[ S_{yi}^i + S_{yi}^iS_{yi}^i \right]_{ij}$ is diagonal. However, this does not imply that the matrix of compensated responses is diagonal because $T_{yi} \neq 0$ for $i \neq j$ unless the tax function is separate.
Let \( \lambda > 0 \) denote the shadow cost of public funds and let:

\[
g(w) \equiv \frac{\Phi_U(U(w);w) \cdot \varpi \left( \sum_{i=1}^{n} Y_i(w) - \mathcal{T}(Y(w)) , Y(w) ; w \right)}{\lambda}
\]  

(18)

denote the social marginal weight of consumption expressed in monetary term (hereafter the social weight) that the government assigns to taxpayer of type \( w \). The government values \( g(w) \) Euros the welfare increase of taxpayers of type \( w \) induced by a transfer of one Euro.\(^8\) Applying the envelope theorem to (2), the effect in monetary terms of a tax perturbation on the government’s social objective is given by (see Appendix B):

\[
\frac{1}{\lambda} \left. \frac{\partial \theta}{\partial x} \right|_{x=0} = - \int_{w \in W} g(w) \left. \frac{\partial \mathcal{T}(Y(w),0)}{\partial x} \right|_{x=0} f(w) \, dw
\]  

(19)

The shadow cost of public funds \( \lambda \) corresponds to the effects on the social objective of a lump-sum transfer to every taxpayers. Combining (17) and (19) for the lump-sum perturbation (11a), the shadow cost of public funds is pinned down by:

\[
0 = \int_{w \in W} \left[ 1 - g(w) - \sum_{i=1}^{n} T_{yi}(Y(w)) \left. \frac{\partial Y_i(w)}{\partial \rho} \right|_{x=0} \right] f(w) \, dw
\]  

(20)

A tax perturbation is generically not budget-balanced, unless \( \frac{\partial \mathcal{B}}{\partial x} \bigg|_{x=0} = 0 \). Therefore, one wants to evaluate not only the effects of a tax perturbation on welfare, but the effects of a tax perturbation which is combined with the lump-sum rebate of the budget surplus, as the latter perturbation is budget-balanced. The next Lemma, which is proved in Appendix C shows the welfare effect of such combination of tax perturbation is of the same sign as the effect of the initial budget-unbalanced tax perturbation on the government’s Lagrangian \( \mathcal{L} \equiv \mathcal{B} + \theta / \lambda \), provided the shadow cost of public funds verifies (20). Combining (17) and (19), this effect is given by:

\[
\left. \frac{\partial \mathcal{L}}{\partial x} \right|_{x=0} = \int_{w \in W} \left\{ \left[ 1 - g(w) - \sum_{i=1}^{n} T_{yi}(Y(w)) \left. \frac{\partial Y_i(w)}{\partial \rho} \right|_{x=0} \right] \left. \frac{\partial \mathcal{T}(Y(w),0)}{\partial x} \right|_{x=0} \right\} f(w) \, dw
\]  

(21)

**Lemma 1.** If the shadow cost of public funds verifies (20), and if \( \left. \frac{\partial \mathcal{L}}{\partial x} \right|_{x=0} > (\text{resp.} <) 0 \), then reforming the tax schedule to \( y \mapsto \mathcal{T}(y,x) \) with a small positive \( x \) (resp. a small negative \( x \)) and rebating the budget surplus in a lump-sum way is a budget-balanced reform that is socially desirable.

Lemma 1 provides a condition on behavioral elasticities, type distribution and welfare weights for the a given tax perturbation to be social desirable. Finally, when types are \( n \) – dimensional, we get: (see Appendix B):

\[
\left[ \frac{\partial Y_i}{\partial w_j} \right]_{i,j} = - \left[ \frac{\partial Y_i}{\partial \tau_j} \right]_{i,j} \cdot \left[ S_{ij} \right]_{i,j}
\]  

(22)

\(^8\)See Saez and Stantcheva (2016) for non-welfarist microfoundations of these welfare weights.
This equation is very important because it relates behavioral responses, which are at the hart of tax perturbations analysis, to the derivatives $S^n_{w_j}$ of marginal rates of substitution with respect to types, which are at the hart of mechanism design analysis. We make the following assumption on preferences:

**Assumption 2.** For each bundle $(c, y)$, the mapping $w \mapsto (S^1(c, y; w), \ldots, S^n(c, y; w))$ is invertible.

This assumption on preferences extends the usual single-crossing condition to the multidimensional context. It is for instance verified when preferences are additively separable of the form:

$$U(c, y; w) = u(c) - \sum_{i=1}^n v^i(y_i, w_i)$$

with:

$$v_i', v_i'^{y_i}, v_i'^{y_i y_j} > 0 > v_i^w, v_i'^{y_i w_j}$$

Assumption 2 not only implies that matrix $\left[ \frac{\partial y_i}{\partial y_j} \right]_{i,j}$ is invertible. It also implies that the mapping $y \mapsto Y(w)$ is globally invertible.\(^9\) We thus get the following relation between the skill density and the tax base density:

$$h(Y(w)) = \frac{f(w)}{\det \left[ \frac{\partial y_i}{\partial y_j} \right]_{i,j}}$$

### III A case where the Optimal Income Tax is Comprehensive

In this section, we exhibit a situation where the optimal allocation can be decentralized by a comprehensive income tax schedule. The Following Proposition is proved in Appendix D.

**Proposition 1.** If preferences are weakly separable, i.e. the utility function $U$ takes the form $U(c, V(y); w) = U(c, U(w) > 0 > U_V, V(\cdot)$ is twice continuously differentiable, increasing in each argument and convex, then the optimal tax is comprehensive.

The intuition for this result is in the spirit of the theorem of Atkinson and Stiglitz (1976) and of its proof by Laroque (2005) and Gauthier and Laroque (2009). Because of weakly separable preferences, whatever their type, individuals choose how to split their efforts in getting the different tax base to minimize the same aggregation $V(\cdot)$ of incomes, while the government is only interested in the resources to be shared, i.e. on the sum of all incomes earned by each individual. In particular, the marginal rate of substitution between two different tax bases does not depend on type as it verifies:

$$\frac{\partial y_i}{\partial y_j} = \frac{\partial y_i}{\partial y_j}$$

---

\(^9\)That matrix $\left[ \frac{\partial y_i}{\partial y_j} \right]_{i,j}$ is invertible only implies that $w \mapsto Y(w)$ is locally invertible. Assume by contradiction the existence of two types $w, w'$ such that that $Y(w) = Y(w') = y$. We thus get $C(w) = C(w') = \sum_{k=1}^n Y_k(w) - T(Y(w)) = c$. According to the first-order conditions (3), we get:

$$(1 - T_{y_i}(y)) \ldots, 1 - T_{y_n}(y) = \left( S^1(c, y; w), \ldots, S^n(c, y; w) \right) = \left( S^1(c, y; w'), \ldots, S^n(c, y; w') \right)$$

Assumption 2 therefore implies that $w = w'$, which ends the proof that $y \mapsto Y(w)$ is globally invertible.
Therefore, the government does not need to distort the relative supply of each tax base. A comprehensive tax schedule is therefore optimal.

It is however worth noting that weakly separable preferences does not verify the single crossing assumption 2. When the tax schedule is comprehensive, the program of individuals of type $w$ can be decomposed into two consecutive stages:

$$\max_v \mathcal{U} \left( v - \mathcal{T}(v), \min_{y s.t. \sum_{i=1}^{n} y_i = v} \mathcal{V}(y); w \right)$$

Therefore, people earning the same taxable income $v = \sum_{i=1}^{n} y_i$ make the same choice $(y_1, ..., y_n)$. Hence each taxpayers receiving the same amount of the $i^{th}$ tax base also receive the same $j^{th}$ income, a prediction that is clearly counter-factual.

The case of weakly separable preference should thus only be understood as an example illustrating when a comprehensive tax schedule is desirable. Conversely, we guess that when the marginal rate of substitution across different tax base vary with types, as it assumed by Assumption 2, the optimal tax schedule is no longer comprehensive.

IV A case where the Optimal Income tax is Separate

I now consider a different specialization where the optimal tax schedule is separate. The following Proposition is proved in Appendix E.

**Proposition 2.** When i) the type space is one-dimensional $W = [w, \bar{w}] \subset \mathbb{R}$, ii) along the optimal allocation, each income admits a positive derivative with respect to type and iii) preferences are quasilinear and additively separable of the form:

$$\mathcal{U}(c, y; w) = c - \sum_{i=1}^{n} \psi^i(y_i; w) \quad \text{with} \quad \psi^i(y_i; w), \psi^j(y_j; w) > 0 > \psi_{y_i,y_j}^i(y_i; w)$$

the optimal tax schedule is separate.

Intuitively, when the unobserved heterogeneity is one-dimensional and the different kind of incomes are increasing in type, redistribution is a single dimension problems from high types agents, earning high levels of all incomes, to low types agents earning low levels of all incomes. The government is therefore interested in achieving the same redistributive goal by shifting the burden of redistribution on the least responsive tax base. Under quasilinear preference and additive separable preference, the government can simply achieve this objective of shifting distortions on the least responsive tax base by a separate income tax because with such preference, the choice of each income depends on the tax schedule only through its own marginal tax rate. This because under such preferences, there is neither income effects nor cross base substitution effects.

Again, the assumption of Proposition 2 are very specific. In general, income effects and cross base substitution effects can not be empirically ruled out. Moreover, the one dimensional
assumption induces that realized tax bases describes a one-dimensional manifold, which is clearly counter-factual. So, this configuration should more be understood as a theoretical curiosity to help understanding when the separate income tax is desirable instead of a relevant policy recommendation.

V Infinitesimal reforms of mixed tax schedules

In this section, I consider general preferences but I restrict the tax schedule to be of the mixed for given in Equation 8. I first characterize the response of taxable income $Y_0$. I show in Appendix F that the responses of the personal income tax base to a lump sum perturbation is given by:

$$\frac{\partial Y_0(w)}{\partial \rho} = \sum_{k=1}^{n} a_k \frac{\partial Y_k(w)}{\partial \rho}$$

(24)

while the response of the personal income tax base to a compensated tax change in the $j$th marginal tax rate is given by:

$$\frac{\partial Y_0(w)}{\partial \tau_j} = \sum_{k=1}^{n} a_k \frac{\partial Y_k(w)}{\partial \tau_j}$$

(25)

and the response of the personal income tax base to an uncompensated tax change in the $j$th marginal tax rate is given by:

$$\frac{\partial Y_0^u(w)}{\partial \tau_j} = \sum_{k=1}^{n} a_k \frac{\partial Y_k^u(w)}{\partial \tau_j}$$

(26)

I now consider the effects of a tax perturbation $\tilde{T}(y, x) = T(y) - x R_i(y_i)$ specific to the $i$th income, where $R_i(\cdot)$ is the direction of the tax reform. Such a perturbation modifies tax liability by:

$$\left. \frac{\partial \tilde{T}(Y(w))}{\partial x} \right|_{x=0} = -R_i(Y_i(w))$$

It modifies the marginal tax rate on the $i$th marginal tax rate by:

$$\left. \frac{\partial \tilde{T}_i(Y(w))}{\partial x} \right|_{x=0} = -R_i'(Y_i(w))$$

And it does not affect the other marginal tax rate. Using Equation (21), the effect of such perturbation on the Lagrangian is (see Appendix F.1):

$$\left. \frac{\partial \mathcal{L}}{\partial x} \right|_{x=0} = \int_{w \in W} \left\{ [g(w) - 1 + \sum_{k=1}^{n} T_k(Y_k(w)) \frac{\partial Y_k(w)}{\partial \rho}] R_i(Y_i(w)) + \left[ \sum_{k=0}^{n} T_k(Y_k(w)) \frac{\partial Y_k^u(w)}{\partial \tau_i} \right] R_i'(Y_i(w)) \right\} f(w)dw$$

Equation (27) summarizes the first-order effect of a perturbation of the taxation of the $i$th income on the government’s Lagrangian. For individuals of type $w$ such reforms induce a change $-R_i(Y_i(w))$ in tax liability and a change $R_i'(Y_i(w))$ in the $i$th net of marginal tax rate. The change in tax liability induces a mechanical effect on tax revenue and on the government’s
objective, the latter being weighted by the social welfare weight $g(w)$. Hence the mechanical effect is equal to $- (1 - g(w)) R_i(Y_i(w))$ times the density of taxpayers of type $w$. The change in tax liability also induces income responses $\frac{\partial T_i}{\partial \tau_i} Y_i(w)$ for all incomes $k \in \{0, ..., n\}$, which trigger a change in tax revenue equal to $\sum_{k=0}^{n} T'_k(Y_k(w)) \frac{\partial T_i}{\partial \tau_i} R_i(Y_i(w))$ times the density. Finally, the change $R'_i(Y_i(w))$ in the $i^{th}$ net of marginal tax rate triggers compensated responses $\frac{\partial Y_i}{\partial w} R'_i(Y_i(w))$ for all incomes $k \in \{0, ..., n\}$, which induce a change in tax revenue equal to $\sum_{k=0}^{n} T'_k(Y_k(w)) \frac{\partial Y_i}{\partial w} R'_i(Y_i(w))$ times the density. Aggregating these effects for all types leads to (27). Importantly not only compensated and income responses of the $i^{th}$ income are taken into account but also “cross base” responses $\frac{\partial Y_i}{\partial w}$ and $\frac{\partial Y_j}{\partial w}$ for $k \neq i$, unless the other incomes are not taxed at the margin.

Given the other tax schedules, the tax schedule specific to the $i^{th}$ income is optimal if such income specific tax perturbation triggers no first-order effect on the Lagrangian, whatever the direction $R_i(\cdot)$ of the tax perturbation. Let:

$$\epsilon_i(y_i) \equiv \frac{1 - T'_i(y_i) \frac{\partial Y_i}{\partial \tau_i}}{y_i} \bigg|_{Y_i(w)=y_i}$$

(28)

denote the average compensated elasticity of the $i^{th}$ income with respect to its own net of marginal tax rate among taxpayers earning $i^{th}$ income equal to $y_i$, where for any variable $X(w)$ and any subset $\Omega \subseteq W$, $X(w)|_{w \in \Omega}$ stands for the mean of $X(w)$ among skill levels $w$ for which $w \in \Omega$. This leads to the following optimal tax formula for the tax schedule specific to the $i^{th}$ income (see Appendix F.1):

$$\frac{T'_i(y_i)}{1 - T'_i(y_i)} \epsilon_i(y_i) y_i h_i(y_i) + \sum_{0 \leq k \leq n, k \neq i} T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \tau_i} \bigg|_{Y_i(w)=y_i} h_i(y_i)$$

(29)

$$= \int_{z=y_i}^{\infty} \left( 1 - g(w) \bigg|_{Y_i(w)=z} - \sum_{k=0}^{n} T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \rho} \bigg|_{Y_i(w)=z} \right) h_i(z) dz$$

Equation (29) extends to the multidimensional case the optimal ABC tax formula of Diamond (1998) and Saez (2001) for the case with a single income. As Saez (2001), Equation (29) relates optimal marginal tax to empirically estimable sufficient statistics which are behavioral responses, income density and welfare weights. There are however two important differences. First, as the underlying heterogeneity is multidimensional, the sufficient statistics have to be averaged across all types earnings the same level of the $i^{th}$ income.\footnote{Saez (2001) conjectured his optimal tax formula can be extended to the case with multidimensional unobserved heterogeneity. This have been formally proved only recently (Hendren, 2017, Jacquet and Lehmann, 2017).} Note that this averaging procedure being along the $i^{th}$ income, it differs from the averaging procedure required for the optimal $j^{th}$ optimal marginal tax rate. Second, and most importantly, not only the compensated elasticity $\epsilon_i(y_i)$ of the $i^{th}$ income with respect to its own marginal tax rate shows up in the left-hand side of (29). Also the compensated responses of the other bases $\frac{\partial Y_i}{\partial w}$ to a compensated change in the $i^{th}$ net of marginal tax rate show up.

To understand why, consider, in the spirit of Saez (2001) a reform of the tax schedule specific to the $i^{th}$ income that consists in a small change denoted $\Delta \tau_i$ of the marginal tax rate for
taxpayers whose \( i \)th income lies in the small interval \([y_i - \delta_{ij}, y_i]\). This reform triggers a change in tax liability equal to \( \Delta \rho = \Delta T_i \delta_{ij} \) for all taxpayers with an \( i \)th income above \( y_i \), which induce mechanical and income responses effect equal to the the right-hand side of (29) times \( \Delta \rho \). Moreover, for taxpayer earning an \( i \)th income between \([y_i - \delta_{ij}, y_i]\), the tax reform induces compensated response equal to \( \frac{\partial Y_i}{\partial \tau_i} \) for all incomes \( Y_k(w) \) with \( k \in \{0, ..., n\} \), and not only for the \( i \)th income. The response of \( k \)th income induces a change in the of the \( k \)th tax liability equal to \(-T_{yk}(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \Delta T_i \). As the mass of such taxpayers is \( h(y_i) \delta_{ij} \), summing these effects for all taxpayers with an \( i \)th income in \([y_i - \delta_{ij}, y_i]\) and taking into account the definition of \( \varepsilon_i \) leads to left-hand side of (29) times \(-\Delta \rho = -\Delta T_i \delta_{ij} \). At the optimum, all these first-order effects should compensate each others, which leads to (29). This reasoning in the spirit of Saez (2001) clarifies that not only the compensated elasticity \( \varepsilon_i \) of the \( i \)th income to the change in the \( i \)th marginal net tax rate matters, but also the “cross-base” responses to the other tax base \( T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \mid_{Y_i(w)=y_i} \) for all \( k \neq i \).

We now investigate the effects of reforms of the personal income tax schedule. For this purpose, we consider tax perturbations of the form \( \Delta \bar{T}(y, x) = T(y) - x R_0(\sum_{k=1}^{n} y_k) \), where \( R_0(\cdot) \) is the direction of the tax reform. Such a perturbation modifies tax liability by:

\[
\frac{\partial \bar{T}(Y(w))}{\partial x} \bigg|_{x=0} = -R_0(Y_0(w))
\]

It modifies the marginal tax rate on the \( j \)th marginal tax rate by:

\[
\frac{\partial \bar{T}_{y_j}(Y(w))}{\partial x} \bigg|_{x=0} = -a_j R'_j(Y_0(w))
\]

According to (10), the marginal tax rate on the \( j \)th income depends not only on the marginal tax rate of its specific tax schedule \( T'_j(\cdot) \) but also on the marginal tax rate of the personal income tax schedule discounted by the indexed parameter \( a_j \). Therefore, as shown in Appendix E.2, a compensated reform of the personal income tax schedule generate responses equal to the sum of the \( j \)th index parameter \( a_j \) times the compensated elasticity of the \( i \)th income to a change in the \( j \)th net of marginal tax rate.

\[
\forall i \in \{0, ..., n\} \quad \frac{\partial Y_i}{\partial \tau_0} = \sum_{j=1}^{n} a_j \frac{\partial Y_i(w)}{\partial \tau_j} \mid_{Y_0(w)=y_i} \quad (30)
\]

Combining (9) and (30), the compensated elasticity of taxable income is:11

\[
\varepsilon_0(y_0) = \frac{1 - T'(y_0)}{y_0} \sum_{1 \leq i,j \leq n} a_i a_j \frac{\partial Y_i(w)}{\partial \tau_j} \mid_{Y_0(w)=y_0} \quad (31)
\]

Given these definitions of the effect of a personal income tax perturbation in the direction \( R_0(\cdot) \) are given by Equation (27) with \( i = 0 \). Consequently, for given income specific tax schedules, the optimal personal income tax schedule verifies (29) with \( i = 0 \). We thus get:

---

11As the matrix \( \frac{\partial Y_i(w)}{\partial \tau_j} \) of compensated responses is positive definite, the compensated elasticity of taxable income is positive unless \( a_1 = ... = a_n = 0 \).
Proposition 3. For all \( i \in \{0, \ldots, n\} \):

i) a tax perturbation specific to the \( i \)th income affects the government’s Lagrangian by (27).

ii) Given the other tax schedules, the optimal tax schedule specific to the \( i \)th income is provided by (29).

We can now describe the effects of change in the tax base parameter \( a_i \) by considering the effect of the tax perturbation \( \mathcal{T}(y, x) = T_0 \left( \sum_{k=1}^{n} a_k y_k - x y_i \right) + \sum_{k=1}^{n} T_k(y_k) \). As formally shown in Appendix F.3, this perturbation induce three effects for taxpayers of type \( w \). First, the tax perturbation decreases tax liability by \( Y_i(w) T'_0(Y_0(w)) \), which induces a mechanical effect equal to \( (g(w) - 1) Y_i(w) T'_0(Y_0(w)) \). Second, according to (10) a decrease in \( a_i \) reduces the impact of the personal income tax schedule on the marginal tax rate of the \( i \)th income. By this effect, the tax perturbation decreases the \( i \)th marginal tax by \( T'_0(Y_0(w)) \). Combined with the decrease in tax liability by \( T'_0(Y_0(w)) Y_i(w) \), this mimics an uncompensated change in the \( i \)th income which triggers a response of the \( k \)th income equal to \( \frac{\partial Y_k}{\partial \tau_k} T'_0(Y_0(w)) \) for all \( k \in \{0, \ldots, n\} \). These behavioral responses in turn modifies tax revenue by \( \sum_{k=0}^{n} T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \tau_k} T'_0(Y_0(w)) \). Finally, according to (9), the perturbation decreases taxable income by \( Y_i(w) \). Because of the nonlinearity of the personal income tax schedule, the marginal tax rates on the \( i \)th income decreases by \( a_j Y_i(w) T'_0(Y_0(w)) \) for all \( j \in \{1, \ldots, n\} \). These changes in marginal tax rates in turn induce compensated responses \( a_j \frac{\partial Y_i}{\partial \tau_i} Y_i(w) T'_0(Y_0(w)) \) for all incomes \( k \) with \( k \in \{0, \ldots, n\} \) and for all \( j \in \{1, \ldots, n\} \), so that the effects on tax revenue is \( \left( \sum_{j=1}^{n} \sum_{k=0}^{n} a_j T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \tau_j} \right) Y_i(w) T'_0(Y_0(w)) \). Adding these effects, weighting them by the density of taxpayers of type \( w \) and aggregating for all types, the effect on the Lagrangian is:

\[
\frac{\partial \mathcal{L}}{\partial x} \bigg|_{x=0} = \int_{w \in W} \left\{ \left[ (g(w) - 1) Y_i(w) + \sum_{k=0}^{n} T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \tau_k} \right] T'_0(Y_0(w)) \right. \\
+ \left. \left( \sum_{j=1}^{n} \sum_{k=0}^{n} a_j T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \tau_j} \right) Y_i(w) T'_0(Y_0(w)) \right\} f(w) \, dw
\]

According to Lemma 1, Equation (32) evaluates the social desirability of a reform that consists in modifying the tax index parameter and to rebate in a lump sum way the government’s net surplus. However, policymakers typically do not consider this way of financing a reform of the personal income tax base (of parameter \( a_i \)). The typical way is combining a change in the tax base parameter \( a_i \) with a proportional change in tax liability on the \( i \)th income, that is with an uncompensated change in the in the \( i \)th marginal tax rate. If the personal income schedule was linear, i.e. if \( T_0(y_0) = t_0 \sum_{k=1}^{n} a_k y_k \), changing the tax parameter \( a_i \) would be equivalent to an uncompensated change in the \( i \)th marginal tax rate. To see this more clearly, one can compare the effects of perturbing \( a_i \), which is provided by (32) to the effects of a linear tax perturbation specific to the \( i \)th income. Plugging \( R_i(y_i) = r_i y_i \) in (27) and using (14) leads to:

\[
\frac{\partial \mathcal{L}}{\partial x} \bigg|_{x=0} = \int_{w \in W} \left\{ \left( 1 - g(w) \right) Y_i(w) - \sum_{k=0}^{n} T'_k(Y_k(w)) \frac{\partial Y_k}{\partial \tau_k} \right\} \left. f(w) \right| \, dw
\]
The two reforms would therefore be equivalent if \( t_0 = r_i \). Otherwise, the change in \( a_i \) is not equivalent to an uncompensated change in the tax rate on the \( i \)th income for (at least) two reasons. First, the uncompensated change in the tax rate specific to the \( i \)th income affects the tax liability of taxpayers proportionally to tax payer's \( i \)th income \( Y_i(w) \), while the change in \( a_i \) affects taxpayers' liability by the personal marginal tax rate \( T_0'(Y_0(w)) \) times their \( i \)th income \( Y_i(w) \). Therefore, whenever the personal income tax schedule is progressive thereby exhibiting increasing marginal tax rates, among taxpayer earning the same \( i \)th income \( Y_i(w) \), those earnings relatively few other incomes are less affected by the change in the tax base parameter \( a_i \) than those earnings relatively more other incomes, because the latter face higher personal income marginal tax rate \( T_0'(Y_0(w)) \). For example, exiting capital income from the personal income tax base (reducing \( a_2 \)) and taxing capital income according to a specific schedule is, among individuals earnings the same capital income, relatively more beneficial to taxpayers whose other incomes also higher, because they face a higher marginal tax rate on their personal income. Second, a reduction in \( a_i \) by reducing taxable income decrease the marginal tax rate on taxable income by \( Y_i(w) T''(Y_0(w)) \). This reduction triggers compensated responses, an effect that does not take place with an uncompensated change in the tax rate specific to the \( i \)th income. For example, when exiting capital income from the personal income tax base, marginal tax rate will decrease which typically increases taxable income but also affects capital income in an ambiguous way depending on the cross base effects.

We now evaluate a balanced-budget reform that consists in decreasing the index parameter \( a_i \) of the \( i \)th income, and in compensating the revenue losses by a proportional increase in the tax rate specific to \( i \)th income. This is typically an incremental reform that moves the tax system toward a more separate and a less comprehensive tax system. I thus consider the tax perturbation \( \bar{T}(y,x) = T_0 \left( \sum_{k=1}^{n} a_k y_k - x y_i \right) + \sum_{k=1}^{n} T_k'(y_k) + r_i(x) y_i \), where \( r_i(x) \) is such that \( \frac{\partial a_r}{\partial x} \bigg|_{x=0} = 0 \). According to (27) and (32) tax revenues are perturbed by:\[\frac{\partial \mathcal{B}}{\partial x} \bigg|_{x=0} = r'_i(0) \int_{w \in \mathcal{W}} \left\{ Y_i(w) - \sum_{k=0}^{n} T_k'(y_k(w)) \frac{\partial Y_k(u)(w)}{\partial \tau_i} \right\} f(w) dw \]

\[\quad - \int_{w \in \mathcal{W}} \left\{ Y_i(w) - \sum_{k=0}^{n} T_k'(y_k(w)) \frac{\partial Y_k(u)(w)}{\partial \tau_i} \right\} T_0'(Y_0(w)) \]

\[\quad - \left( \sum_{j=1}^{n} a_j T'_j(y_j(w)) \frac{\partial Y_j(u)(w)}{\partial \tau_j} \right) Y_i(w) T_0''(Y_0(w)) \right\} f(w) dw\]

If the proportional tax rate on the \( i \)th income is on the correct side of the Laffer curve, one

\[\text{(27) and in (32).}\]
and the effect on the social objective is:

This is more likely the case when the effect of a compensated change in the more desirable is this switch to a more separate income tax system. According to Equation (33)

\[ T'_i(0) = \int_{w \in W} \left\{ Y_i(w) - \sum_{k=0}^n T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \right\} f(w) \, dw \]

\[ \int_{w \in W} \left\{ Y_i(w) - \sum_{k=0}^n T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \right\} f(w) \, dw \]

\[ - \int_{w \in W} \left( \sum_{j=1}^n \sum_{k=0}^n a_j T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \right) Y_i(w) T'_0(Y_0(w)) f(w) \, dw \]

\[ \int_{w \in W} \left\{ Y_i(w) - \sum_{k=0}^n T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \right\} f(w) \, dw \]

to get a budget-balanced tax perturbation. The effect on the welfare of taxpayers of type \( w \) is then given by:

\[ \frac{1}{\lambda} \frac{\partial \Phi(U(w); \omega)}{\partial x} \bigg|_{x=0} = (T'_0(Y_0(w)) - T'_i(0)) Y_i(w) g(w) \]

and the effect on the social objective is:

\[ \frac{1}{\lambda} \frac{\partial \theta}{\partial x} \bigg|_{x=0} = \int_{w \in W} (T'_0(Y_0(w)) - T'_i(0)) Y_i(w) g(w) f(w) \, dw \] (34)

The sufficient statistics summarizing all the efficiency arguments in favor of exiting \( i \)-th income from the personal income tax base and taxing in a proportional way is \( r'_i(0) \). If \( r'_i(0) \) is negative, the personal income tax base is so inefficient that exiting \( i \)-th income alone increases tax revenue. In such a case, the reform is Pareto improving. Otherwise, a unit decrease in \( a_i \) has to be compensated by an increase in \( r'_i(0) \) of the proportional tax rate on the \( i \)-th income to keep the budget balanced, which decrease the welfare of taxpayers. Therefore the lower \( r'_i(0) \), the more desirable is this switch to a more separate income tax system. According to Equation (33) this is more likely the case when the effect of a compensated change in the \( i \)-th marginal tax rate

\[ Y_i(w) - \sum_{k=0}^n T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \]

is lower when the marginal tax rate on personal income is higher, and when the stimulating effect of reducing the taxable income

\[ \sum_{j=1}^n \sum_{k=0}^n a_j T'_k(Y_k(w)) \frac{\partial Y_i(w)}{\partial \tau_i} \]

is stronger.

However, not all taxpayers may benefit from this reform. Among taxpayers earning \( i \)-th income \( Y_i(w) \), those earnings relative more other income typically face a higher marginal tax rate \( T'_0(Y_0(w)) \) on their taxable income, thereby benefit relatively more from the exiting of \( i \)-th income from the personal income tax base than the others. Conversely, the proportional increase in the tax rate specific to the \( i \)-th income affects identically the welfare of all taxpayers earnings the same \( i \)-th income. If the all the incomes are perfectly correlated, as it was the case in Section IV, then the effects are the same across all agents earning the same \( i \)-th income (because they then earn the same taxable income \( Y_0(w) \)). Conversely, if agents earning the same \( i \)-th income earn very different taxable income, thereby facing very different marginal tax rate on their personal income, some may win (because \( T'_0(Y_0(w)) > T'_i(0) \)) from the reform while some other may lose (because \( T'_0(Y_0(w)) > T'_i(0) \)). Therefore, whether or not the reform is socially desirable depends on the distribution of welfare weights between winners and losers.
Proposition 4. Reducing a, and compensating the revenue losses by a proportional tax on the i\textsuperscript{th} income is socially desirable if and only if the expression in (34) is positive.

References


A Convexity of the indifference curves

Let \( \mathcal{C}(\cdot, \cdot, \cdot, \cdot) \) denote the reciprocal of \( \mathcal{U}(\cdot, \cdot, \cdot, \cdot) \). Taxpayers of type \( \cdot \) earning incomes \( \cdot \) should get consumption \( c = \mathcal{C}(u, \cdot, \cdot, \cdot) \) to enjoy utility \( u = \mathcal{U}(c, \cdot, \cdot, \cdot) \). We get:

\[
\mathcal{C}_u(u, y; w) = \frac{1}{\mathcal{U}_c(\mathcal{C}(u, y; w), y, w)} \quad \mathcal{C}_{y_i}(u, y; w) = S^i(\mathcal{C}(u, y; w), y; w)
\]

For each type \( w \in \mathcal{W} \) and each utility level \( u \), I assume the indifference curve: \( y \mapsto \mathcal{C}(u, y; w) \) to be strictly convex. The \( i^{th} \) partial derivative of \( y \mapsto \mathcal{C}(u, y; w) \) is \( S^i(\mathcal{C}(u, y; w), y; w) \), so the Hessian is the matrix

\[
\begin{bmatrix}
S_{y_j}^i + S_i^j S_j^i \\
\end{bmatrix}
\]

The first-order condition of (2) is given by:

\[
0 = (1 - T_{y_i}(y)) \mathcal{U}_c \left( \sum_{k=1}^{n} y_k - T(y), y; w \right) + \mathcal{U}_{y_i} \left( \sum_{k=1}^{n} y_k - T(y), y; w \right)
\]

So, using (3), the matrix of the second-order condition is:

\[
\left[ \mathcal{U}_{y_i y_j} + S^i \mathcal{U}_{c y_j} + S^j \mathcal{U}_{c y_i} + S^i S^j \mathcal{U}_{c c} - \mathcal{U}_c T_{y_i y_j} \right]_{i,j} = -\mathcal{U}_c \left[ S_{y_j}^i + S_i^j S_j^i + T_{y_i y_j} \right]_{i,j}
\]

The second-order condition holds strictly for taxpayer of type \( w \) if and only if matrix

\[
\left[ S_{y_j}^i + S_i^j S_j^i + T_{y_i y_j} \right]_{i,j}
\]

is positive definite, that is if and only if, the indifference curve \( y \mapsto \mathcal{C}(U(w), y; w) \) is more convex than the budget set \( y \mapsto \sum_{k=1}^{n} y_k - T(y) \) at \( y = Y(w) \) and \( c = C(w) \).

B Behavioral elasticities

We first rewrite (2) in terms of lump-sum and compensated reforms at tax base \( Y(w) \):

\[
\max_{y = (y_1, ..., y_n)} \mathcal{U} \left( \sum_{k=1}^{n} y_k - T(y) + \sum_{k=1}^{n} \tau_k(y_k - Y_k(w)) + \rho, y; w \right)
\]

Using (1), the first-order conditions (3) are:

\[
\forall i \in \{1, ..., n\} : \quad S^i \left( \sum_{k=1}^{n} y_k - T(y) + \sum_{j=1}^{n} \tau_j(y_j - Y_j(w)) + \rho, Y(w); w \right) = 1 - T_{y_i}(Y(w)) + \tau_i
\]

Under Assumption 1, one can apply the implicit function theorem to the first-order conditions at \( y = Y(w) \) \( \tau_1 = ... = \tau_n = \rho = 0 \), which leads to:

\[
\begin{bmatrix}
S_{y_j}^i + S_i^j S_j^i + T_{y_i y_j} \end{bmatrix}_{i,j} \cdot dy^T = (d \tau_1, ..., d \tau_n)^T - (S^1_c, ..., S^n_c)^T d \rho
\]

(36)
Inverting this system, we get the matrix of compensated responses in Equation (12), and the vector of income response given in Equation (13).

Rewriting Program (2) and the first-order conditions (3) after a general tax perturbation \( y \mapsto \tilde{T}(y, x) \) leads to:

\[
\max_{y=(y_1, \ldots, y_n)} \mathcal{U} \left( \sum_{k=1}^{n} y_k - \tilde{T}(y, x), y; w \right)
\]

and:

\[
\forall i \in \{1, \ldots, n\} : \quad S^i \left( \sum_{k=1}^{n} y_k - \tilde{T}(y, x), Y(w); w \right) = 1 - \tilde{T}_{yi}(Y(w), x)
\]

Using the implicit function theorem to differentiate these first-order conditions at \( y = Y(w) \) and \( x = 0 \) leads to:

\[
\left[ S_{yi}^i + S_i^j S^j + T_{yi} \right]_{i,j} \cdot dY^T = \left\{ - \left( \frac{\partial T_{y_i}}{\partial x}, \ldots, \frac{\partial T_{y_n}}{\partial x} \right)^T \right\} dx
\]

Plugging (12) and (13) into (38) leads to (15). Finally, applying the envelope theorem to (37) leads to:

\[
\frac{\partial \mathcal{U}(w)}{\partial x} \bigg|_{x=0} = -\mathcal{U} \left( \sum_{k=1}^{n} Y_k(w) - T(Y(w)), Y(w); w \right) \frac{\partial \tilde{T}(Y(w), 0)}{\partial x}
\]

which leads to (19). In the case where the tax perturbation is linear, i.e. \( \tilde{T}(y, x) = T(y) - x y_j \) as in (11c), Equation (15) simplifies to:

\[
\frac{\partial Y_i(w)}{\partial x} \bigg|_{x=0} = \frac{\partial Y_i(w)}{\partial \tau_j} + Y_j(w) \frac{\partial Y_i(w)}{\partial \rho}
\]

which leads to (14).

The differentiation of first-order conditions (3) with respect to type \( w \) leads to:

\[
\left[ S_{yi}^i + S_i^j S^j + T_{yi} \right]_{i,j} \cdot dY^T = - \left[ S_{wi}^i \right]_{i,j} \cdot dw^T
\]

which, combined with (12), leads to Equation (22).

C Proof of Lemma 1

Let \( y \mapsto \tilde{T}(y, x) \) be a tax perturbation and let \( \ell(x) \) be the lump-sum rebate such that the tax perturbation \( y \mapsto \tilde{T}(y, x) + \ell(x) \) is budget-balanced. We denote \( \frac{\partial X}{\partial x} \bigg|_{x=0} \), the partial derivative of an economic variable \( X \) along the tax perturbation \( y \mapsto \tilde{T}(y, x) \) while \( \frac{\partial X}{\partial x} \bigg|_{x=0}^* \) denotes the partial derivative of \( X \) along the budget-balanced tax perturbation \( y \mapsto \tilde{T}(y, x) + \ell(x) \). We have from the envelope theorem and (19):

\[
\frac{1}{\lambda} \frac{\partial \phi}{\partial x} \bigg|_{x=0} = \frac{1}{\lambda} \frac{\partial \phi}{\partial x} \bigg|_{x=0} - \ell'(0) \int_{w \in W} s(w) f(w) dw
\]

\[
= \frac{1}{\lambda} \frac{\partial \phi}{\partial x} \bigg|_{x=0} - \ell'(0) \int_{w \in W} \left[ 1 - \sum_{i=1}^{n} T_{yi}(Y(w)) \frac{\partial Y_i(w)}{\partial \rho} \right] f(w) dw
\]
where the second equality is derived from Equation (20) determining the shadow value of public funds. From (15), we get

$$\frac{\partial Y_i(w)}{\partial x} \bigg|_{x=0}^* = \frac{\partial Y_i(w)}{\partial x} \bigg|_{x=0} - \ell'(0) \frac{\partial Y_i(w)}{\partial \rho}$$

which implies that:

$$0 = \frac{\partial \mathcal{B}}{\partial x} \bigg|_{x=0}^* = \frac{\partial \mathcal{B}}{\partial x} \bigg|_{x=0} + \ell'(0) \int_{w \in W} \left[ 1 - \sum_{i=1}^n \mathcal{T}_i(Y(w)) \right] \frac{\partial Y_i(w)}{\partial \rho} f(w) dw \quad (41)$$

where the first equality is due to $\ell(x)$ being adjusted so that the tax perturbation $y \mapsto \mathcal{T}(y, x) + \ell(x)$ is budget-balanced, i.e. $0 = \frac{\partial \mathcal{B}}{\partial x} \bigg|_{x=0}^*$. Combining Equations (40) and (41) leads to:

$$\frac{1}{\lambda} \frac{\partial \theta}{\partial x} \bigg|_{x=0}^* = \frac{\partial \mathcal{B}}{\partial x} \bigg|_{x=0} + \frac{1}{\lambda} \frac{\partial \theta}{\partial x} \bigg|_{x=0} = \frac{\partial \mathcal{L}}{\partial x} \bigg|_{x=0}$$

D Proof of Proposition 1

Following Laroque (2005) and Gauthier and Laroque (2009), the proof consists in stating that for any tax schedule $y \mapsto \mathcal{T}(y)$ there exists a mapping $\mathcal{S}(\cdot)$ defined on the positive real line such that each type of individuals gets the same utility under $y$ if there exist two types $w, w'$ such that $V(w) = V(w')$, then one need to have $C(w^*) = C(w')$. If by contradiction $C(w^*) > C(w')$ (the argument for $C(w^*) < C(w')$ is symmetric), then type $w'$ would obtain a higher utility by choosing $Y(w^*)$ than $Y(w')$ as in such a case: $\mathcal{U}(C(w^*), Y(w^*) ; w') > \mathcal{U}(C(w^*), Y(w^*) ; w')$. I then define function $\mathcal{R}(\cdot)$ such that, for each real $v$, either there exists $w$ such that $V(w) = V(w')$, in which case we define $\mathcal{R}(v) = C(w)$, or $\mathcal{R}(v) = -\infty$. For individuals of type $w$ solving (42) amounts to solve

$$\max_y \mathcal{U} \left( \sum_{i=1}^n y_i - \mathcal{T}(y), \mathcal{V}(y); w \right)$$

(42)

Let $C(w) \equiv \sum_{i=1}^n Y_i(w) - \mathcal{T}(Y(w))$, let $V(w) \equiv \mathcal{V}(Y(w))$ and let $U(w) \equiv \mathcal{U}(C(w), Y(w); w) = \mathcal{U}(C(w), V(w); w)$.

I first note that if there exist two types $w^* \neq w'$ such that $V(w^*) = V(w')$, then one need to have $C(w^*) = C(w')$. If by contradiction $C(w^*) > C(w')$ (the argument for $C(w^*) < C(w')$ is symmetric), then type $w'$ would obtain a higher utility by choosing $Y(w^*)$ than $Y(w')$ as in such a case: $\mathcal{U}(C(w^*), Y(w^*) ; w') > \mathcal{U}(C(w^*), Y(w^*) ; w') = \mathcal{U}(C(w'), V(w') ; w') = \mathcal{U}(C(w'), Y(w') ; w')$ which would contradict that $y = Y(w)$ solves (42) for individuals of type $w'$.

Next, I define function $\mathcal{R}(\cdot)$ such that, for each real $v$, either there exists $w$ such that $v = V(w)$, in which case we define $\mathcal{R}(v) = C(w)$, or $\mathcal{R}(v) = -\infty$. For individuals of type $w$ solving (42) amounts to solve

$$\max_v \mathcal{U}(\mathcal{R}(v), v; w)$$

(43)

As $\mathcal{V}(\cdot)$ is convex, the program

$$V(g) \equiv \min_y \mathcal{V}(y) \quad s.t. \quad \sum_{i=1}^n y_i = g$$

(44)

is well defined and so is its value $V(\cdot)$. I then define $\mathcal{T}(\cdot)$ by:

$$\mathcal{T} : g \mapsto \mathcal{T}(g) \equiv g - \mathcal{R}(V(g))$$

22
Under the tax schedule \( y \mapsto T \left( \sum_{i=1}^{n} y_i \right) \), one has
\[
\sum_{i=1}^{n} y_i - T \left( \sum_{i=1}^{n} y_i \right) = R \left( V \left( \sum_{i=1}^{n} y_i \right) \right)
\]
Hence, under the tax schedule \( y \mapsto T \left( \sum_{i=1}^{n} y_i \right) \), taxpayers of type \( w \) solve:
\[
\max_y \quad \mathcal{U} \left( R \left( V \left( \sum_{i=1}^{n} y_i \right) \right), V(y); w \right)
\]
This problem can be solved into steps. First, solving the dual of (44)
\[
\max_y \sum_{i=1}^{n} y_i \quad s.t.: \quad V(y) = v
\]
for given level of subutility \( v \). Second, solving Program (43). The tax schedule \( y \mapsto T \left( \sum_{i=1}^{n} y_i \right) \) therefore leads each type of individual to reach the same \( V(w) \) and the same utility \( U(w) \) than the tax schedule \( y \mapsto T(y) \). However, tax revenues increases if, with the initial tax schedule \( T(\cdot), Y(w) \) is not solving
\[
\max_y \sum_{i=1}^{n} y_i \quad s.t.: \quad V(y) = V(w) \iff \min_y V(y) \quad s.t.: \sum_{i=1}^{n} y_i = \sum_{i=1}^{n} Y_i(w)
\]

E Proof of Proposition 2

We need to show that under the assumptions of Proposition 2, the optimal allocation \( w \mapsto (C(w), Y_1(w), \ldots, Y_n(w)) \) can be decentralized by a separate income tax. Under the assumptions of Proposition 2, for each \( i \in \{1, \ldots, n\} \), Function \( Y_i: w \mapsto Y_i(w) \) is invertible with a reciprocal denoted \( Y_i^{-1} \) and defined on \([Y_i(w), Y_i(w)]\).

We first characterize how the separate income tax schedule \( y \mapsto T(y) = \sum_{i=1}^{n} T_i(y_i) \) should be to decentralize the allocation \( w \mapsto (C(w), Y_1(w), \ldots, Y_n(w)) \) and second verify this tax schedule actually decentralize the optimal optimal allocation \( w \mapsto (C(w), Y_1(w), \ldots, Y_n(w)) \).

Using the first-order condition (3) on each tax base, we can recover for each type \( w \) and each tax base \( i \in \{1, \ldots, n\} \), the \( i \)th marginal tax rate from the \( i \)th marginal rate of substitution. We thus need to have:
\[
T_i'(y_i) = 1 - v_i'(y_i; Y_i^{-1}(y_i))
\]
Let \( w^* \) be a skill level and let \( y_i^* = Y_i(w^*) \). If the allocation \( w \mapsto (C(w), Y_1(w), \ldots, Y_n(w)) \) can be decentralized by a separate income tax, this tax schedule has to verify:
\[
T_i(y_i) = \begin{cases} 
\int_{y_i}^{y_i^*} \left[ 1 - v_i'(t; Y_i^{-1}(t)) \right] dt & \text{if: } y_i \in [Y_i(w), Y_i(w)] \\
+\infty & \text{if: } y_i \notin [Y_i(w), Y_i(w)]
\end{cases}
\]
where:
\[
T_i(y_i) = \left( \sum_{i=1}^{n} Y_i(w^*) \right) - C(w^*) + \sum_{i=1}^{n} T_i(y_i)
\]
So up to a constant, each income specific tax schedule is uniquely defined.

We now show that the separate tax schedule (45) induces the allocation \( w \mapsto (C(w), Y_1(w), \ldots, Y_n(w)) \). First, as (45) is separate and preferences are additively separable, the \( n \) dimensional program (2) of individual of type \( w \) can be simplified into \( n \) one-dimensional programs:
\[
\sum_{i=1}^{n} \left\{ \max_{y_i} y_i - T_i(y_i) - v_i'(y_i; w) \right\}
\]
From (45), marginal tax rates are given by: $1 - T_{yi}(y) = v_{yi}^i \left( y_i; Y_i^{-1}(y_i) \right)$. The $i$th first-order condition is obviously verified when $y_i = Y_i(w)$.

Finally we have to verify that for each skill level $w$ and each tax base, $Y_i(w)$ maximizes $y_i \mapsto y_i - T_i(y_i) - v^i(y_i; w)$. When $y_i \in [Y_i(w), Y_i(\bar{w})]$, we get that:

$$\frac{y_i - T_i(y_i) - v^i(y_i; w)}{y_i} = \frac{\int_{y_i}^{y_i^*} v^i_j \left( t; Y_i^{-1}(t) \right) \, dt}{y_i}$$

So, we have:

$$y_i - T_i(y_i) - v^i(y_i; w) = y_i^* - v^i(y_i^*; w) + \int_{y_i}^{y_i^*} \left[ v^i_j \left( t; Y_i^{-1}(t) \right) - v^i_j \left( t; w \right) \right] \, dt$$

$$\left[ Y_i(w) - T_i(Y_i(w)) - v^i(Y_i(w); w) \right] - \left[ y_i - T_i(y_i) - v^i(y_i; w) \right] = \int_{y_i}^{Y_i(w)} \left[ v^i_j \left( t; Y_i^{-1}(t) \right) - v^i_j \left( t; w \right) \right] \, dt$$

The latter expression is positive because $v^i_{yw} < 0$ and $Y_i^{-1}(\cdot)$ is increasing.

### F Multidimensional case

We first rewrite Equations (16)-(21) when the tax schedule is given by (8). According to (9), we get:

$$\frac{\partial Y_0(w)}{\partial x} \bigg|_{x=0} = \sum_{k=1}^{n} a_k \frac{\partial Y_k(w)}{\partial x} \bigg|_{x=0}$$

$$= - \sum_{j=1}^{n} \left( \sum_{k=1}^{n} a_k \frac{\partial Y_k(w)}{\partial \tau_j} \right) \frac{\partial \tau_j}{\partial x} \bigg|_{x=0} - \sum_{k=1}^{n} \left( a_k \frac{\partial Y_k(w)}{\partial \rho} \right) \frac{\partial \rho}{\partial x} \bigg|_{x=0}$$

Equation (15) is therefore also verified for taxable income with $i = 0$ as long as the income response and compensated responses of taxable income are respectively defined by (24) and (25).

Given the form of the tax schedule in (8), Equation (16) becomes:

$$\frac{\partial \tau(Y(w), x)}{\partial x} \bigg|_{x=0} = \frac{\partial \tau(Y(w), x)}{\partial x} \bigg|_{x=0} + \sum_{k=0}^{n} T_k^i(Y_k(w)) \frac{\partial Y_k(w)}{\partial x} \bigg|_{x=0}$$

Combining the latter Equation with (15), we get:

$$\frac{\partial \tau(Y(w), x)}{\partial x} \bigg|_{x=0} = \left[ 1 - \sum_{k=0}^{n} T_k^i(Y_k(w)) \frac{\partial Y_k(w)}{\partial \rho} \right] \frac{\partial \tau(Y(w), x)}{\partial x} \bigg|_{x=0}$$

$$- \sum_{j=1}^{n} \left[ \sum_{k=0}^{n} T_k^i(Y_k(w)) \frac{\partial Y_k(w)}{\partial \tau_j} \right] \frac{\partial \tau_j(Y(w), x)}{\partial x} \bigg|_{x=0}$$

Using (19), Equation (21), which provides the effect of a tax perturbation on the Lagrangian, becomes:

$$\frac{\partial \ell}{\partial x} \bigg|_{x=0} = \int_{w \in W} \left\{ \left[ 1 - g(w) - \sum_{i=0}^{n} T_i^i(Y_i(w)) \frac{\partial Y_i(w)}{\partial \rho} \right] \frac{\partial \tau(Y(w), 0)}{\partial x} \bigg|_{x=0} \right. \right.$$  

$$- \left. \left. \sum_{j=1}^{n} \left( \sum_{i=0}^{n} T_i^i(Y_i(w)) \frac{\partial Y_i(w)}{\partial \tau_j} \right) \frac{\partial \tau_j(Y(w), 0)}{\partial x} \bigg|_{x=0} \right\} f(w) \, dw \right) \right.$$
F.1 Reforms of the tax schedule specific to the $i$th income

I consider tax perturbations of the form:

$$\tilde{T}(y, x) = T_0 \left( \sum_{k=1}^{n} a_k y_k \right) + \sum_{k=1}^{n} T_k(y_k) - x R_i(y_i)$$

which implies:

$$\left. \frac{\partial \tilde{T}(Y(w), x)}{\partial x} \right|_{x=0} = -R_i(Y_i(w)) \quad \text{and} \quad \left. \frac{\partial \tilde{T}_y(Y(w), x)}{\partial x} \right|_{x=0} = -R'_i(Y_i(w))$$

Equation (46) then leads to (27), thereby to part i) of Proposition 3. Using the law of iterated expectations to condition type $w$ on $Y_i(w) = y_i$ and using (28) leads to:

$$\left. \frac{\partial \mathcal{L}}{\partial x} \right|_{x=0} = \int_{y_i \in \mathbb{R}_+} \left\{ \left[ \frac{T'_i(y_i)}{1 - T'_i(y_i)} \right] \epsilon_i(y_i) y_i + \sum_{0 \leq k \leq n, k \neq i} T'_k(Y_k(w)) \frac{\partial Y_k(w)}{\partial \tau_j} \right|_{Y_i(w) = y_i} R'(y_i) \right\} h(y_i) \, dy_i$$

Integrating the latter equation by parts and using (20) leads to:

$$\left. \frac{\partial \mathcal{L}}{\partial x} \right|_{x=0} = \int_{y_i \in \mathbb{R}_+} \left\{ \left[ \frac{T'_i(y_i)}{1 - T'_i(y_i)} \right] \epsilon_i(y_i) y_i + \sum_{0 \leq k \leq n, k \neq i} T'_k(Y_k(w)) \frac{\partial Y_k(w)}{\partial \tau_j} \right|_{Y_i(w) = y_i} R'(y_i) \right\} h(y_i) \, dy_i$$

If $T_i(\cdot)$ is optimal given the other tax schedules, any perturbation of taxation of the $i$th income should yield no first-order effect, whatever the direction $R_i(\cdot)$, thereby, whatever $R'_i(\cdot)$. Therefore, the integrand in preceding expression should be zero for all $y_i$, which leads to (29), thereby to part i) of Proposition 3.

F.2 Reforms of the personal income tax schedule

I consider tax perturbations of the form:

$$\tilde{T}(y, x) = T_0 \left( \sum_{k=1}^{n} a_k y_k \right) + \sum_{k=1}^{n} T_k(y_k) - x R_0 \left( \sum_{k=1}^{n} a_k y_k \right)$$

which implies:

$$\left. \frac{\partial \tilde{T}(Y(w), x)}{\partial x} \right|_{x=0} = -R_0(Y_0(w)) \quad \text{and} \quad \left. \frac{\partial \tilde{T}_y(Y(w), x)}{\partial x} \right|_{x=0} = -a_j R'_0(Y_0(w))$$

Using (15) leads to:

$$\left. \frac{\partial Y_k(w)}{\partial x} \right|_{x=0} = \sum_{j=1}^{n} a_j \frac{\partial Y_k(w)}{\partial \tau_j} R'_0(Y_0(w)) + \frac{\partial Y_k(w)}{\partial \rho} R_0(Y_0(w)) \quad \forall k \in \{1, \ldots, n\}$$
which implies Equation (30) for \( k \in \{1, \ldots, n\} \). Combining the latter equation with (9), (24) and (25) leads to:

\[
\frac{\partial Y_0(w)}{\partial x} \bigg|_{x=0} = \sum_{1 \leq k \leq n} a_k a_j \frac{\partial Y_k(w)}{\partial y_j} R_0'(Y_0(w)) + \sum_{k=1}^{n} a_k \frac{\partial Y_k(w)}{\partial \rho} R_0(Y_0(w))
\]

\[
= \sum_{j=1}^{n} a_j \frac{\partial Y_0(w)}{\partial y_j} R_0'(Y_0(w)) + \frac{\partial Y_0(w)}{\partial \rho} R_0(Y_0(w))
\]

which implies (30) also holds for \( k = 0 \), i.e. with taxable income. According to Equation (46), one gets:

\[
\frac{\partial \mathcal{F}}{\partial x} \bigg|_{x=0} = \int_{w \in W} \left\{ \left[ \sum_{k=0}^{n} T_k'(Y_k(w)) \left( \sum_{j=1}^{n} a_j \frac{\partial Y_k(w)}{\partial y_j} \right) \right] R_0'(Y_0(w)) \right\} f(w) \, dw
\]

\[
+ \left[ -1 + g(w) + \sum_{k=0}^{n} T_k'(Y_k(w)) \frac{\partial Y_k(w)}{\partial \rho} \right] R_0(Y_0(w)) f(w) \, dw
\]

\[
= \int_{w \in W} \left\{ \left[ \sum_{k=0}^{n} T_k'(Y_k(w)) \frac{\partial Y_k(w)}{\partial \rho} \right] R_0(Y_0(w)) \right\} f(w) \, dw
\]

where the second equality uses (30) and corresponds to (27) with \( i = 0 \). Part \( i \) of Proposition 3 is therefore also valid for \( i = 0 \), thereby Part \( ii \).

F.3 Reforms of the personal income tax base

I consider tax perturbations of the form:

\[
\mathcal{T}(y, x) = T_0 \left( \sum_{k=1}^{n} a_k y_k - x y_i \right) + \sum_{k=1}^{n} T_k(y_k)
\]

which implies:

\[
\frac{\partial \mathcal{T}(Y(w), x)}{\partial x} \bigg|_{x=0} = -Y_i(w) T_0'(Y_0(w))
\]

\[
\frac{\partial \mathcal{T}_y(Y(w), x)}{\partial x} \bigg|_{x=0} = -T_0'(Y_0(w)) \sum_{i=0}^{n} Y_i(w) T_0''(Y_0(w))
\]

\[
\forall j \in \{1, \ldots, n\}, j \neq i \quad \frac{\partial \mathcal{T}_y(Y(w), x)}{\partial x} \bigg|_{x=0} = -a_j Y_j(w) T_0''(Y_0(w))
\]

Using (46) leads to:

\[
\frac{\partial \mathcal{L}}{\partial x} \bigg|_{x=0} = \int_{w \in W} \left\{ \left[ \sum_{k=0}^{n} T_k'(Y_k(w)) \frac{\partial Y_k(w)}{\partial \tau_i} \right] T_0'(Y_0(w)) \right\} f(w) \, dw
\]

\[
+ \left[ \sum_{j=1}^{n} a_j T_k'(Y_k(w)) \frac{\partial Y_k(w)}{\partial \tau_j} \right] Y_i(w) T_0''(Y_0(w)) f(w) \, dw
\]

Using (14), the preceding equation simplifies to (32).