

Summary of Proposed Amendments to SB 851

Description of Changes	-2	-3
• Add back amounts deducted as Foreign Derived Intangible Income (FDII)	X	
• Add back amounts deducted as Global Intangible Low-Taxed Income (GILTI)	X	X
• Add back amounts deducted as foreign-source dividends	X	X
• Clarifies that GILTI is treated as a dividend within Oregon	X	X
• Add back amounts deducted for deemed repatriation (personal income taxation)	X	X
• Clarifies that amounts subtracted from federal taxable income are also excluded from app. %	X	X