

119TH CONGRESS
1ST SESSION

H. R. 782

To amend the Internal Revenue Code of 1986 to establish a credit for hired critical employees and to make permanent certain expiring provisions relating to the child tax credit.

IN THE HOUSE OF REPRESENTATIVES

JANUARY 28, 2025

Mr. JAMES (for himself and Mr. CISCOMANI) introduced the following bill;
which was referred to the Committee on Ways and Means

A BILL

To amend the Internal Revenue Code of 1986 to establish a credit for hired critical employees and to make permanent certain expiring provisions relating to the child tax credit.

1 *Be it enacted by the Senate and House of Representa-*
2 *tives of the United States of America in Congress assembled,*

3 **SECTION 1. SHORT TITLE.**

4 This Act may be cited as the “Reignite Hope Act of
5 2025”.

6 **SEC. 2. CREDIT FOR HIRED CRITICAL EMPLOYEES.**

7 (a) IN GENERAL.—Subpart A of part IV of sub-
8 chapter A of chapter 1 of the Internal Revenue Code of

1 1986 is amended by inserting after section 25E the fol-
2 lowing new section:

3 **“SEC. 25F. CREDIT FOR HIRED CRITICAL EMPLOYEES.**

4 “(a) ALLOWANCE OF CREDIT.—In the case of a crit-
5 ical employee, there shall be allowed \$3,500 as a credit
6 against the tax imposed by this chapter.

7 “(b) CRITICAL EMPLOYEE.—For purposes of this
8 section:

9 “(1) IN GENERAL.—The term ‘critical em-
10 ployee’ means any of the following individuals whose
11 employer certifies that such individual worked full-
12 time for not less than 75 percent of the taxable year
13 in such professional capacity and that such individ-
14 ual’s primary place of employment for the majority
15 of hours worked during such taxable year is located
16 in a qualified opportunity zone:

17 “(A) A healthcare professional.

18 “(B) A law enforcement officer (as such
19 term is defined in section 806 of title I of the
20 Omnibus Crime Control and Safe Streets Act of
21 1968).

22 “(C) A member of a rescue squad or am-
23 bulance crew (as such term is defined in section
24 806 of title I of the Omnibus Crime Control
25 and Safe Streets Act of 1968).

1 “(D) A firefighter (as such term is defined
2 in section 806 of title I of the Omnibus Crime
3 Control and Safe Streets Act of 1968).

4 “(E) an eligible child care provider or fam-
5 ily child care provider (as such terms are de-
6 fined in section 658P of the Child Care and De-
7 velopment Block Grant Act of 1990).

8 “(F) personal or home care aide (as such
9 term is defined in section 2008 of the Social
10 Security Act).

11 “(2) HEALTHCARE PROFESSIONAL.—The term
12 ‘healthcare professional’ means—

13 “(A) a certified nursing assistant, or

14 “(B) a licensed practical nurse or reg-
15 istered professional nurse.

16 “(3) The term ‘qualified opportunity zone’
17 means a census tract designated as a qualified op-
18 portunity zone under section 1400z–1(b)(1) as of
19 the date of the enactment of this section.

20 “(c) SUNSET.—No credit shall be allowed under sub-
21 section (a) for any taxable year beginning after the date
22 that is 3 years after the date of the enactment of this
23 section.”.

24 (b) CLERICAL AMENDMENT.—The table of section
25 for subpart A of part IV of subchapter A of chapter 1

1 of such Code is amended by inserting after the item relat-
 2 ing to section 25E the following new item:

“Sec. 25F. Credit for hired critical employees.”.

3 (c) EFFECTIVE DATE.—The amendments made by
 4 this section shall apply to taxable years beginning after
 5 the date of the enactment of this section.

6 **SEC. 3. PERMANENT EXTENSION AND MODIFICATION OF**
 7 **SPECIAL RULES FOR CHILD TAX CREDIT.**

8 (a) IN GENERAL.—Section 24 of the Internal Rev-
 9 enue Code of 1986 is amended by striking subsections (a),
 10 (b), and (c) and inserting the following new subsections:

11 “(a) ALLOWANCE OF CREDIT.—There shall be al-
 12 lowed as a credit against the tax imposed by this chapter
 13 for the taxable year an amount equal to the sum of—

14 “(1) \$3,500 for each qualifying child of the tax-
 15 payer (\$4,500 in the case of a qualifying child who
 16 has not attained age 6 as of the close of the cal-
 17 endar year in which the taxable year of the taxpayer
 18 begins), and

19 “(2) in the case of any taxable year beginning
 20 before January 1, 2026, \$500 for each qualifying
 21 dependent (other than a qualifying child) of the tax-
 22 payer.

23 “(b) LIMITATION BASED ON ADJUSTED GROSS IN-
 24 COME.—The amount of the credit allowable under sub-
 25 section (a) shall be reduced (but not below zero) by \$50

1 for each \$1,000 (or fraction thereof) by which the tax-
 2 payer’s modified adjusted gross income exceeds \$400,000
 3 in the case of a joint return (\$200,000 in any other case).
 4 For purposes of the preceding sentence, the term “modi-
 5 fied adjusted gross income” means adjusted gross income
 6 increased by any amount excluded from gross income
 7 under section 911, 931, or 933.

8 “(c) QUALIFYING CHILD; QUALIFYING DEPEND-
 9 ENT.—For purposes of this section—

10 “(1) QUALIFYING CHILD.—The term ‘qualifying
 11 child’ means any qualifying dependent of the tax-
 12 payer—

13 “(A) who is a qualifying child (as defined
 14 in section 152(c)) of the taxpayer,

15 “(B) who has not attained age 18 at the
 16 close of the calendar year in which the taxable
 17 year of the taxpayer begins, and

18 “(C) whose name and social security num-
 19 ber are included on the taxpayer’s return of tax
 20 for the taxable year.

21 “(2) QUALIFYING DEPENDENT.—The term
 22 ‘qualifying dependent’ means any dependent of the
 23 taxpayer (as defined in section 152 without regard
 24 to all that follows ‘resident of the United States’ in
 25 section 152(b)(3)(A)) whose name and TIN are in-

1 cluded on the taxpayer’s return of tax for the tax-
2 able year.

3 “(3) SOCIAL SECURITY NUMBER DEFINED.—

4 For purposes of this subsection, the term ‘social se-
5 curity number’ means, with respect to a return of
6 tax, a social security number issued to an individual
7 by the Social Security Administration, but only if
8 the social security number is issued—

9 “(A) to a citizen of the United States or
10 pursuant to subclause (I) (or that portion of
11 subclause (III) that relates to subclause (I)) of
12 section 205(c)(2)(B)(i) of the Social Security
13 Act, and

14 “(B) on or before the due date of filing
15 such return.”.

16 (b) PORTION OF CREDIT REFUNDABLE.—Section
17 24(d)(1) of such Code is amended—

18 (1) by striking subparagraph (A) and inserting
19 the following:

20 “(A) the credit which would be allowed
21 under this section determined—

22 “(i) without regard to subsection
23 (a)(2), and

1 “(ii) without regard to this subsection
 2 (other than this subparagraph) and the
 3 limitation under section 26(a), or”, and
 4 (2) in subparagraph (B)(i), by striking “15 per-
 5 cent of so much of the taxpayer’s earned income
 6 (within the meaning of section 32) which is taken
 7 into account in computing taxable income for the
 8 taxable year as exceeds \$3,000” and inserting “15.3
 9 percent of the taxpayer’s earned income (within the
 10 meaning of section 32) which is taken into account
 11 in computing taxable income”.

12 (c) CONFORMING AMENDMENTS.—

13 (1) Section 24(e) of such Code is amended to
 14 read as follows:

15 “(e) TAXPAYER IDENTIFICATION REQUIREMENT.—
 16 No credit shall be allowed under this section if the identi-
 17 fying number of the taxpayer was issued after the due date
 18 for filing the return of tax for the taxable year.”.

19 (2) Section 24 of such Code is amended by
 20 striking subsection (h).

21 (d) REMOVAL OF DEADWOOD.—

22 (1) Section 24 of such Code is amended by
 23 striking subsections (i), (j), and (k).

24 (2) Chapter 77 of such Code is amended by
 25 striking section 7527A (and by striking the item re-

1 lating to section 7527A in the table of sections for
2 such chapter).

3 (3) Section 26(b)(2) of such Code is amended
4 by inserting “and” at the end of subparagraph (X),
5 by striking “, and” at the end of subparagraph (Y)
6 and inserting a period, and by striking subparagraph
7 (Z).

8 (4) Section 3402(f)(1)(C) of such Code is
9 amended by striking “section 24 (determined after
10 application of subsection (j) thereof)” and inserting
11 “section 24(a)”.

12 (5) Section 6211(b)(4)(A) of such Code is
13 amended—

14 (A) by striking “24 by reason of sub-
15 sections (d) and (i)(1) thereof” and inserting
16 “24(d)”, and

17 (B) by striking “6428B, and 7527A” and
18 inserting “and 6428B”.

19 (6) Section 1324(b)(2) of title 31, United
20 States Code, is amended by striking “6431, or
21 7527A” and inserting “or 6431”.

22 (e) EFFECTIVE DATE.—The amendments made by
23 this section shall apply to taxable years beginning after
24 December 31, 2024.

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