

as cosponsors of amendment No. 1941 intended to be proposed to H.R. 3935, a bill to amend title 49, United States Code, to reauthorize and improve the Federal Aviation Administration and other civil aviation programs, and for other purposes.

AMENDMENT NO. 1952

At the request of Mr. McCONNELL, his name was added as a cosponsor of amendment No. 1952 intended to be proposed to H.R. 3935, a bill to amend title 49, United States Code, to reauthorize and improve the Federal Aviation Administration and other civil aviation programs, and for other purposes.

AMENDMENT NO. 1977

At the request of Mr. LEE, the names of the Senator from Montana (Mr. DAINES) and the Senator from Kansas (Mr. MARSHALL) were added as cosponsors of amendment No. 1977 intended to be proposed to H.R. 3935, a bill to amend title 49, United States Code, to reauthorize and improve the Federal Aviation Administration and other civil aviation programs, and for other purposes.

AMENDMENT NO. 1997

At the request of Mr. ROMNEY, the name of the Senator from West Virginia (Mr. MANCHIN) was added as a cosponsor of amendment No. 1997 intended to be proposed to H.R. 3935, a bill to amend title 49, United States Code, to reauthorize and improve the Federal Aviation Administration and other civil aviation programs, and for other purposes.

AMENDMENT NO. 1999

At the request of Mr. LEE, the names of the Senator from Montana (Mr. DAINES) and the Senator from Kansas (Mr. MARSHALL) were added as cosponsors of amendment No. 1999 intended to be proposed to H.R. 3935, a bill to amend title 49, United States Code, to reauthorize and improve the Federal Aviation Administration and other civil aviation programs, and for other purposes.

STATEMENTS ON INTRODUCED BILLS AND JOINT RESOLUTIONS

By Mr. DURBIN (for himself, Mr. REED, Mr. WHITEHOUSE, Mr. BLUMENTHAL, Mr. SANDERS, Ms. HIRONO, Ms. DUCKWORTH, Mr. VAN HOLLEN, and Ms. BALDWIN):

S. 4275. A bill to amend the Internal Revenue Code of 1986 to modify the rules relating to inverted corporations; to the Committee on Finance.

Mr. DURBIN. Madam President, I ask unanimous consent that the text of the bill be printed in the RECORD.

There being no objection, the text of the bill was ordered to be printed in the RECORD, as follows:

S. 4275

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

This Act may be cited as the “Stop Corporate Inversions Act of 2024”.

SEC. 2. MODIFICATIONS TO RULES RELATING TO INVERTED CORPORATIONS.

(a) IN GENERAL.—Subsection (b) of section 7874 of the Internal Revenue Code of 1986 is amended to read as follows:

“(b) INVERTED CORPORATIONS TREATED AS DOMESTIC CORPORATIONS.—

“(1) IN GENERAL.—Notwithstanding section 7701(a)(4), a foreign corporation shall be treated for purposes of this title as a domestic corporation if—

“(A) such corporation would be a surrogate foreign corporation if subsection (a)(2) were applied by substituting ‘80 percent’ for ‘60 percent’; or

“(B) such corporation is an inverted domestic corporation.

“(2) INVERTED DOMESTIC CORPORATION.—For purposes of this subsection, a foreign corporation shall be treated as an inverted domestic corporation if, pursuant to a plan (or a series of related transactions)—

“(A) the entity completes after May 8, 2014, the direct or indirect acquisition of—

“(i) substantially all of the properties held directly or indirectly by a domestic corporation; or

“(ii) substantially all of the assets of, or substantially all of the properties constituting a trade or business of, a domestic partnership; and

“(B) after the acquisition, either—

“(i) more than 50 percent of the stock (by vote or value) of the entity is held—

“(I) in the case of an acquisition with respect to a domestic corporation, by former shareholders of the domestic corporation by reason of holding stock in the domestic corporation; or

“(II) in the case of an acquisition with respect to a domestic partnership, by former partners of the domestic partnership by reason of holding a capital or profits interest in the domestic partnership; or

“(ii) the management and control of the expanded affiliated group which includes the entity occurs, directly or indirectly, primarily within the United States, and such expanded affiliated group has significant domestic business activities.

“(3) EXCEPTION FOR CORPORATIONS WITH SUBSTANTIAL BUSINESS ACTIVITIES IN FOREIGN COUNTRY OF ORGANIZATION.—A foreign corporation described in paragraph (2) shall not be treated as an inverted domestic corporation if after the acquisition the expanded affiliated group which includes the entity has substantial business activities in the foreign country in which or under the law of which the entity is created or organized when compared to the total business activities of such expanded affiliated group. For purposes of subsection (a)(2)(B)(iii) and the preceding sentence, the term ‘substantial business activities’ shall have the meaning given such term under regulations in effect on January 18, 2017, except that the Secretary may issue regulations increasing the threshold percent in any of the tests under such regulations for determining if business activities constitute substantial business activities for purposes of this paragraph.

“(4) MANAGEMENT AND CONTROL.—For purposes of paragraph (2)(B)(ii)—

“(A) IN GENERAL.—The Secretary shall prescribe regulations for purposes of determining cases in which the management and control of an expanded affiliated group is to be treated as occurring, directly or indirectly, primarily within the United States. The regulations prescribed under the preceding sentence shall apply to periods after May 8, 2014.

“(B) EXECUTIVE OFFICERS AND SENIOR MANAGEMENT.—Such regulations shall provide that the management and control of an expanded affiliated group shall be treated as occurring, directly or indirectly, primarily

within the United States if substantially all of the executive officers and senior management of the expanded affiliated group who exercise day-to-day responsibility for making decisions involving strategic, financial, and operational policies of the expanded affiliated group are based or primarily located within the United States. Individuals who in fact exercise such day-to-day responsibilities shall be treated as executive officers and senior management regardless of their title.

“(5) SIGNIFICANT DOMESTIC BUSINESS ACTIVITIES.—For purposes of paragraph (2)(B)(ii), an expanded affiliated group has significant domestic business activities if at least 25 percent of—

“(A) the employees of the group are based in the United States,

“(B) the employee compensation incurred by the group is incurred with respect to employees based in the United States,

“(C) the assets of the group are located in the United States; or

“(D) the income of the group is derived in the United States, determined in the same manner as such determinations are made for purposes of determining substantial business activities under regulations referred to in paragraph (3) as in effect on January 18, 2017, but applied by treating all references in such regulations to ‘foreign country’ and ‘relevant foreign country’ as references to ‘the United States’. The Secretary may issue regulations decreasing the threshold percent in any of the tests under such regulations for determining if business activities constitute significant domestic business activities for purposes of this paragraph.”

(b) CONFORMING AMENDMENTS.—

(1) Clause (i) of section 7874(a)(2)(B) of such Code is amended by striking “after March 4, 2003,” and inserting “after March 4, 2003, and before May 8, 2014.”

(2) Subsection (c) of section 7874 of such Code is amended—

(A) in paragraph (2)—

(i) by striking “subsection (a)(2)(B)(ii)” and inserting “subsections (a)(2)(B)(ii) and (b)(2)(B)(i)”; and

(ii) by inserting “or (b)(2)(A)” after “(a)(2)(B)(i)” in subparagraph (B);

(B) in paragraph (3), by inserting “or (b)(2)(B)(i), as the case may be,” after “(a)(2)(B)(ii)”; and

(C) in paragraph (5), by striking “subsection (a)(2)(B)(ii)” and inserting “subsections (a)(2)(B)(ii) and (b)(2)(B)(i)”; and

(D) in paragraph (6), by inserting “or inverted domestic corporation, as the case may be,” after “surrogate foreign corporation”.

(c) EFFECTIVE DATE.—The amendments made by this section shall apply to taxable years ending after May 8, 2014.

By Mr. DURBIN (for himself, Ms. WARREN, Mr. SANDERS, Mr. MERKLEY, Ms. HIRONO, Mr. VAN HOLLEN, Mr. WYDEN, and Mr. BLUMENTHAL):

S.J. Res. 77. A joint resolution proposing an amendment to the Constitution of the United States relative to the fundamental right to vote; to the Committee on the Judiciary.

Mr. DURBIN. Madam President, I ask unanimous consent that the text of the bill be printed in the RECORD.

There being no objection, the text of the bill was ordered to be printed in the RECORD, as follows:

S.J. RES. 77

Resolved by the Senate and House of Representatives of the United States of America in Congress assembled (two-thirds of each House concurring therein), That the following article

is proposed as an amendment to the Constitution of the United States, which shall be valid to all intents and purposes as part of the Constitution when ratified by the legislatures of three-fourths of the several States:

“ARTICLE —

“SECTION 1. Every citizen of the United States, who is of legal voting age, shall have the fundamental right to vote in any public election held in the jurisdiction in which the citizen resides.

“SECTION 2. The fundamental right of citizens of the United States to vote shall not be denied or abridged by the United States or by any State or political subdivision within a State unless such denial or abridgment is in furtherance of a compelling governmental interest and is the least restrictive means of furthering that compelling governmental interest.

“SECTION 3. The portion of section 2 of the fourteenth article of amendment to the Constitution of the United States that consists of the phrase ‘or other crime,’ is repealed.

“SECTION 4. The Congress shall have the power to enforce this article and protect against any denial or abridgment of the fundamental right to vote by legislation.”.

SUBMITTED RESOLUTIONS

SENATE RESOLUTION 676—SUPPORTING THE GOALS AND IDEALS OF NATIONAL NURSES WEEK, TO BE OBSERVED FROM MAY 6 THROUGH MAY 12, 2024

Mr. MERKLEY (for himself, Mr. WICKER, Mrs. BLACKBURN, Mr. BLUMENTHAL, Mr. BOOKER, Mr. BROWN, Mrs. CAPITO, Ms. CORTEZ MASTO, Mr. CRAMER, Mr. DAINES, Ms. DUCKWORTH, Mr. GRASSLEY, Mr. HICKENLOOPER, Ms. HIRONO, Mr. LUJÁN, Mr. MANCHIN, Mr. PADILLA, Mr. PETERS, Mr. ROUNDS, Mrs. SHAHEEN, Ms. SINEMA, Ms. SMITH, Ms. STABENOW, Mr. TILLIS, Ms. WARREN, and Mr. WELCH) submitted the following resolution; which was referred to the Committee on Health, Education, Labor, and Pensions:

S. RES. 676

Whereas, beginning in 1991, National Nurses Week has been celebrated annually from May 6, also known as “National Recognition Day for Nurses” through May 12, the birthday of Florence Nightingale, the founder of modern nursing;

Whereas National Nurses Week is a time of year to reflect on the important contributions that nurses make in providing safe, high-quality health care;

Whereas nurses serve on the front lines, risking their lives to treat the injured and sick during wartime, natural disasters, and public health emergencies;

Whereas nurses are known to be patient advocates, acting to protect the lives of individuals under their care;

Whereas nurses represent the largest single component of the health care profession, with an estimated population of more than 4,700,000 registered nurses in the United States;

Whereas nurses are leading in the delivery of quality care in a transformed health care system that improves patient outcomes and safety;

Whereas the Future of Nursing reports of the Institute of Medicine and National Academy of Medicine have highlighted the need for the nursing profession to meet the call for leadership in a team-based delivery model;

Whereas, when nurse staffing levels increase, the risk of patient complications and lengthy hospital stays decrease, resulting in cost savings;

Whereas nurses are experienced researchers, and the work of nurses encompasses a wide scope of scientific inquiry, including clinical research, health systems and outcomes research, and nursing education research;

Whereas nurses provide care that is sensitive to the cultures and customs of individuals across the United States;

Whereas nurses are well-positioned to provide leadership to eliminate health care disparities that exist in the United States;

Whereas nurses are the cornerstone of the public health infrastructure, promoting healthy lifestyles and educating communities on disease prevention and health promotion;

Whereas nurses help inform, educate, and work closely with legislators to improve—

- (1) the education, retention, recruitment, and practice of all nurses; and
- (2) the health and safety of the patients for whom the nurses care;

Whereas there is a need to—

- (1) strengthen nursing workforce development programs at all levels, including the number of doctorally prepared faculty members; and
- (2) provide education to the nurse research scientists who can develop new nursing care models to improve the health status of the diverse population of the United States;

Whereas nurses impact the lives of the people of the United States through every stage of life; and

Whereas nursing has been voted the most honest and ethical profession in the United States: Now, therefore, be it

Resolved, That the Senate—

- (1) supports the goals and ideals of National Nurses Week, as founded by the American Nurses Association;
- (2) recognizes the significant contributions of nurses to the health care system of the United States; and
- (3) encourages the people of the United States to observe National Nurses Week with appropriate recognition, ceremonies, activities, and programs to demonstrate the importance of nurses to the everyday lives of patients.

AMENDMENTS SUBMITTED AND PROPOSED

SA 2001. Mr. MARSHALL (for himself and Mrs. BLACKBURN) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, to amend title 49, United States Code, to reauthorize and improve the Federal Aviation Administration and other civil aviation programs, and for other purposes; which was ordered to lie on the table.

SA 2002. Mr. CRAPO (for himself, Mr. WYDEN, Mr. RISCH, and Mr. MERKLEY) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2003. Mr. GRASSLEY (for himself and Mr. WHITEHOUSE) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2004. Mr. ROMNEY submitted an amendment intended to be proposed to

amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2005. Mr. CARDIN (for himself and Mr. VAN HOLLEN) submitted an amendment intended to be proposed by him to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2006. Ms. WARREN (for herself and Mr. HAWLEY) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2007. Mr. SCHATZ (for himself and Mr. CRUZ) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2008. Mr. DURBIN submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2009. Mr. DURBIN (for himself, Ms. DUCKWORTH, and Mr. GRASSLEY) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2010. Mr. WYDEN submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2011. Mr. DURBIN submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2012. Mr. CORNYN (for himself and Mr. KING) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2013. Mr. KENNEDY submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2014. Mr. KENNEDY submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2015. Mr. KENNEDY submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2016. Mr. SULLIVAN submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2017. Ms. CANTWELL (for herself and Mr. LUJÁN) submitted an amendment intended to be proposed to amendment SA 1911 proposed by Ms. CANTWELL (for herself, Mr. CRUZ, Ms. DUCKWORTH, and Mr. MORAN) to the bill H.R. 3935, supra; which was ordered to lie on the table.

SA 2018. Ms. HIRONO (for herself, Ms. MURKOWSKI, and Mr. CASEY) submitted an amendment intended to be proposed to amendment