Migration and Wage Effects of Taxing Top Earners:

Evidence from Denmark

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 Many countries/states tempted to lower tax rates to keep/attract high-skilled labor

Triggered important debates:

Migration:

Are location decisions of high-skilled labor responsive to tax differentials?

2 Incidence:

Who benefits from lower tax rates on high-skilled labor?

Spillovers:

Are natives hurt by lower tax rates on foreign high-skilled labor?

Why do migration responses matter?

Migration responses...

- 1 increase the efficiency cost of taxation
- 2 limit the redistributive ability of governments
- induce socially suboptimal labor tax competition between countries/jurisdictions
- Very scarce empirical research on migration responses to taxation compared to standard labor supply responses:
 - Lack of good micro data containing citizenship information
 - Issues about how to identify causal effects on migration

- Incidence of income taxes on high-skilled labor...
 - 1 determines redistributive impact of such taxes
 - e sheds light on functioning of labor market for high-skilled individuals
- Little empirical evidence on income tax incidence and impact of taxes on wage setting process
 - Lack of within ability-level variations in tax rates

This paper

- Use Danish Foreigners' Tax Scheme, with presence of large discontinuities in tax liability depending on:
 - 1 Contract start date (before and after June 1, 1991)
 - Ouration of stay (3-year rule)
 - 3 Earnings level (earnings eligibility threshold)
- Main findings:
 - 1 Large positive migration responses
 - 2 Increase in gross earnings for stayers after 3 years
 - 3 Bunching just above scheme threshold
 - 4 No hole below scheme threshold
 - **5** No evidence of spillover effects
- Develop a simple matching frictions model to rationalize findings 1 to 4

Outline

1 Institutional background and data

- 2 Theoretical framework
- Migration Responses
 Extensive Margin
 Duration
 Policy implications
- Incidence

Spillovers

Foreigners' Tax Scheme in Denmark:

Passed in 1992; applicable to contracts signed after 1 June, 1991

- Flat tax of 30% (25% after 1995) in lieu of the regular progressive income tax (top rate of above 60%)
- Up to 3 years after which taxpayer subject to ordinary income tax

Eligibility requirements:

- No tax liability in Denmark in the 3 years prior to going on the scheme
- ► Annual earnings of at least 103,000 Euros (as of 2009, indexed): ≈ top .5% of the income distribution

- Administrative files for the full population living in Denmark:
 - Complete socio-economic info
- Complete tax data and researchers' tax scheme info
- Migration information:
 - Dates of entry and exit, country of in/out migration, citizenship

Composition Take-up

Table 1 : Descriptive statistics

	(1)	(2)		
	mean	standard dev		
	Scheme employees 1991-2010			
	Number of sch	eme spells=11642		
Fraction with proof of residence	.949	.220		
Duration of stay (yrs)	2.345	1.448		
fraction > 3 yrs	.251	.434		
Scheme earnings (2009 DK1000s)	1217.8	2094.7		
as a fraction of thresh.	1.53	2.67		
Average tax rate	.308	.003		
Age	39.97	8.80		
	Scheme take-up rate: .81			
	Firms 1991-2010			
	Number of scheme participating firms=223			
# of employees	438.06	2316.47		
average gross wage (2009 DK1000s)	437.6	305.0		
# of scheme employees	1.8	3.2		
# of native employees above thresh.	13.99	61.65		

1 Institutional background and data

2 Theoretical framework

Migration Responses Extensive Margin Duration Policy implications

Incidence

6 Spillovers

- Four main findings:
 - 1 Positive migration responses
 - 2 Increase in gross earnings for stayers after 3 years
 - **3** Bunching just above scheme threshold
 - **4** No hole below scheme threshold
- Standard model can explain 1 and 3
- Model with matching frictions can explain 1, 2, 3 and 4

Common features: Migration

- Individuals have productivity y
- Reservation wage y₀ for working in Denmark

$$y_0 = rac{z_h(1- au_h) +
u}{1- au} = rac{y_0^{ au=0}}{1- au}$$

- 1 z_h , τ_h wage and average tax rate in home country
- **2** ν net cost of migrating
- **3** τ average tax rate in Denmark: $\tau^{S} < \tau^{D}$

Migration:

- Worker migrates in if and only if $y_0 \leq y$
- Scheme reduces y_0 and causes migration when $y_0^S \le y < y_0^D$

Standard Model vs. Matching Model

- **Standard model**, workers paid their marginal product *y*
- Model with matching frictions
 - Workers and firms expend resources to create a match
 - When matched, surplus \Rightarrow band of acceptable wages (y_0, y)
- Pretax wage *z* splits the surplus:
 - Nash bargaining maximizes:

$$W = (y - z)^{1 - eta} ((1 - au)z - y_0^{ au = 0})^eta$$

• $\beta \in [0,1]$, bargaining power of worker

$$z = \beta y + (1 - \beta) y_0$$

• Nests standard model: case $\beta = 1$

Bargaining theory predictions

Pretax wage increases with au

If $\beta < 1$, scheme **reduces** pretax wage z



Bunching at \bar{z} :

- Bunching from above when bargaining power of firm $1 \beta > 0$
- Bunching from below when bargaining power of workers $\beta > 0$



Panel A: Pre-Scheme Earnings Distribution for Foreigners







Panel C: Intensive (Bargaining) Responses Conditional on Migration

Panel D: Intensive and Migration Responses



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Figure 1 : Total number of foreigners in different income groups



Control 1= annualized income between .8 and .9 of threshold Control 2= annualized income between .9 and .995 of threshold. Figure 2 : Number of arrivals of foreigners in different income fractiles (1980-2005)



NOTE: All groups levels are adjusted to be equal in 1990 to the 1990 level for the treatment group.

- DD identification assumption: parallel trend
- Confounder 1: Fanning-out of income distribution
 - High income increase faster than rest of the distribution
 - More foreigners cross the threshold \bar{z}
- Confounder 2: Bunching from below (Hole)
 - Bargaining with large β
 - Standard labor supply response

Figure 3 : Fraction of foreigners in different income fractiles (1980-2005)



Scheme threshold always between the 99.5th and the 99th percentile of the income distribution.



Table 2 : Migration Elasticity Estimates

	(1) Total number of foreigners	(2) Number of arrivals	(3) Number of foreigners with less than 3 years of presence			
	Treatment: Earnings above threshold,					
	Control: Earn	ings between 80% and	1 99% of threshold			
A1. Baseline						
$\overline{\varepsilon_{lt}}$ (long-term)	1.625***	1.779***	2.049***			
	(0.162)	(0.168)	(0.148)			
E-+ (short-term)	1 280***	1 590***	1 756***			
	(0.151)	(0.228)	(0.170)			
A2. Control for pre-existing trends	(*****)	()	(•••••)			
$\overline{\varepsilon_{lt}}$ (long-term)	1.756***	1.771***	2.152***			
	(0.176)	(0.168)	(0.158)			
A3. Placebo						
ε_{lt} (long-term)	-0.0602	-0.0101	0.0796			
	(0.0823)	(0.245)	(0.161)			
A5. Nordic countries						
ε_{lt} (long-term)	1.442***	1.805***	2.208***			
	(0.166)	(0.287)	(0.257)			
A6. English-speaking countries						
ε_{lt} (long-term)	1.852***	2.186***	2.281***			
	(0.222)	(0.246)	(0.206)			
A7. Danish expatriates						
ε_{lt} (long-term)	0.0185 (0.0280)	-0.0913 (0.0708)	-0.0998 (0.0613)			

Figure 5 : Density of the Duration of Stay of Foreigners: 1980-1990



Figure 6 : Density of the Duration of Stay of Foreigners: 1991-2006



Global elasticity from DD estimates:

$$e = rac{1- au}{N} rac{\partial N}{\partial (1- au)} \simeq 1.5$$

Tax Revenue maximizing rate for foreigners in scheme:

$$au^* = 1/(1+e) = 40\%$$

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Figure 7 : Effects of the Tax Scheme on Pre-tax Earnings: Repeated Cross-Section Evidence



Sample: all individuals arrived in Denmark staying less than 3 yrs, with gross earnings in year 1 between .7 and 4 times the eligibility threshold

Table 3 :Repeated Cross-section Estimates of the Effects of the TaxScheme on Pre-tax Earnings

	(1) (2) (3) (4) DD: Less than 3 years of presence				(5)	(6) DDD: More than 3 years
		Grouped estimator			With bunchers	as control
Reduced form estimate	-0.0476*** (0.0103)	-0.0476 ^{**} (0.0138)	-0.0566*** (0.0117)	-0.130* (0.0535)	-0.0951*** (0.0103)	-0.0946*** (0.0205)
Elasticity $\frac{d \log z}{d \log(1-\tau)}$ estimate	-0.180*** (0.0371)	-0.180** (0.0498)	-0.171*** (0.0342)	-0.390* (0.156)	-0.296*** (0.0345)	-0.297*** (0.0604)
Industry, Age, Citizenship			×	×	×	×
Differential time trends				×		
Ν	18518	46	18518	18518	21245	22382

Notes: Robust standard errors clustered at the group × year level in parentheses, *p < 0.05, **p < 0.01, ***p < 0.001. For year t, the sample includes foreigners who arrive during year t - 1, stay the full calendar year t in Denmark, and stay for a duration of less than 3 years in Denmark. The sample includes years 1980-2006 but excluding years 1991-1994 (data for years 1991-1994 are not available). The control group are foreigners with earnings between 70% and 95% of the scheme eligibility threshold.

- Previous graph potentially confounded by self-selection in the scheme
- More powerful test: migrants who stay 4+ years face increase from τ_S to τ_D in year 3
 - Controls for individual f-e
 - Under standard model: no change / decrease in z if standard labor supply response
 - Under bargaining model: increase in z

Empirical Test: Implementation

Estimate for foreigners staying 4+ yrs DD individual f-e model:

$$z_{id} = \alpha_i + \sum_{d=0}^{T} \gamma_d + \delta(\mathbb{1}[z_{i,d=1} > \bar{z}] \cdot \mathbb{1}[d \ge 3]) + \varepsilon_{id}$$

d: year since arrival in Denmark

- ► z_{i,d=1}: earnings in year 1 in Denmark
- Identifying assumption: no unobservable correlated with both being in the scheme and earnings growth right in year 3

Control groups:

- 1 Double-diff: migrants below scheme threshold
- 2 Triple-diff: migrants before reform

Figure 8 : Effects of the Tax Scheme on Pre-tax Earnings: Panel Evidence: After introduction of the scheme



Sample: all individuals arrived in Denmark between 1995 and 2002 and staying at least 4 yrs or more in Denmark, with gross earnings in year 1 between .7 and 1.5 of the eligibility threshold

Figure 9 : Effects of the Tax Scheme on Pre-tax Earnings: Panel Evidence: Before introduction of the scheme



Sample: all individuals arrived in Denmark between 1995 and 2002 and staying at least 4 yrs or more in Denmark, with gross earnings in year 1 between .7 and 1.5 of the eligibility threshold

Table 4 :Panel Estimates of the Effects of the Tax Scheme on Pre-taxEarnings

	(1)	(2)	(3)	(4)	
	Tre	atment	Placebo		
	Entry	after 1991	Entry 1980 to 1990		
	OLS	Heckman	OLS	Heckman	
	(stayers only)	2-step	(stayers only)	2-step	
Reduced form estimate	0.0925***	0.0829**	-0.0229	0.0314	
	(0.0256)	(0.0265)	(0.0228)	(0.0245)	
Elasticity $\frac{d \log z}{d \log z}$ estimate	196***	176**	.049	067	
$d \log(1 - 7)$	(.054)	(.056)	(.048)	(.052)	
Exclusion restrictions:		Average tax rate in home country + citizenship		Average tax rate in home country + citizenship	
Ν	2943	5616	2341	3508	
λ		0.187		0.152	
		(0.0149)		(0.0162)	
LR test of independence		$\chi^2 = 118.5$		$\chi^2 = 91.35$	
		$Prob > \chi^2 = .00$		$Prob > \chi^2 = .00$	

Notes: Robust standard errors clustered at the individual level in parentheses, *p < 0.05, **p < 0.01, ***p < 0.001. All specifications are fixed-effects models on a balanced panel of stayers. Column (2) controls for potential selection on the earnings profile using the average tax rates in the home country at the time scheme elapses and citizenship dummies as exclusion restrictions in the selection equation for staying more than 3 years. λ is the estimated inverse Mills ratio.

Spillover effects of the scheme

Potential effects of the scheme on native earnings distribution

- Productivity spillovers: increase (?) in earnings
- Market level incidence: decrease in equilibrium earnings / displacement of locals
- Scheme-induced influx of foreigners:
 - ▶ From 3.5 to 7.5% of top .5% of the income distribution
 - $\blacktriangleright~\approx$ 1.8 scheme foreigners in scheme firms vs 14 top natives
 - Small influx relative to total stock of high-skill natives
 Cannot expect to find large spillover effects
- Investigate effect of scheme at industry and firm level
 - Instrument a la Bartik to control for endogeneity of scheme use

Figure 10 : Evidence on Spillovers Effects of the Scheme: Industry Level



Table 5 : Regression-Based Estimates of Spillovers Effects of theScheme: Industry Level

	(1)	(2)	(3)	(4)	
	Log averag	ge earnings of top	Log number of top		
	non-sch	eme employees	non-scheme employees		
	OLS	IV	OLS	IV	
$\frac{d \log y}{d \log(\text{Top foreigners})}$.012	035	.471	.564	
3(1 3)	(.018)	(.089)	(.07)	(.312)	
N	27	27	27	27	

Notes: Robust s.e. in parentheses. Top native employees are defined as employees with earnings above 75% of the scheme threshold (which corresponds roughly to the top 3% of the distribution of earnings among the natives.) Column (1) regresses the difference in log average real gross earnings of top native employees between 1980-1990 and 1991-2000 for each industry on the difference in the log number of top foreign employees (defined as foreigners with annualized earnings above the scheme eligibility threshold) by industry between 1980-1990 and 1991-2000. Column (2) instruments for the difference in log number of top foreign employees as an outcome. All specifications control for the log initial size of the industry, and in column (1) and (2) for the log initial number of top employees in the industry

Figure 11 : Evidence on Spillovers Effects of the Scheme: Firm Level



Table 6 :Regression-Based Estimates of Spillovers Effects of theScheme:Firm Level

	(1)	(2)	(3)	(4)	(5)	(6)
	Log average earnings of top			Log number of top non-scheme employees		
	OLS	Matching	IV	OLS	Matching	ĪV
Reduced form estimate	002 (.013)	.018 (.017)	028 (.045)	.187 (.019)	.163 (.062)	006 (.051)
$\frac{d \log y}{d \log(\text{Top foreigners})}$	009 (.017)	.036 (.033)	.03 (.046)	.573 (.022)	.32 (.122)	.012 (.104)
Post-estimation						
Durbin-Wu-Hausman test of endogeneity	F(1, 2825) = 1.0799 Prob > $F = .299$				F(1, 26938) = 31.214 Prob > $F = .00$	
Shea partial-R-square			.0941			.0446
N	2852	2852	2852	26966	26966	26966

Notes: Robust s.e. in parentheses. Sample is a balanced panel of all firms active in Denmark in all years between 1986 and 1996. In columns (2) and (5), we present a matching estimator using the Mahalanobis distance based on the same controls as in the OLS regression. In columns (3) and (6), we instrument for scheme participation (reduced form) or for the difference in log number of top foreign employees using the log initial number of top foreign employees in the firm. All specifications control for firm size, industry, initial average earnings in the firm for all non-scheme employees and initial number of top earners.

Conclusions

Empirical findings:

- 1 Identification of migration response to net-of-tax rate
- 2 Negative effect of net-of-tax rate on gross earnings
- **3** Bunching above scheme threshold and no hole below
- 4 No evidence of massive spillover effects
- Policy implications on migration:
 - Elasticities potentially larger for small countries / tax base (Kanbur and Keen, 1993)
 - Preferential tax schemes for skilled workers likely to generate severe tax competition in Europe
- Theoretical implications for tax incidence:
 Market-level incidence: competitive markets
 Micro-level incidence: frictions and bargaining

BACK UP SLIDES

Figure 12 : Citizenship of Scheme Beneficiaries, 1991-2005



Figure 13 : Industry of Scheme Beneficiaries, 1991-2005



Figure 14 : Scheme Take-up rate for eligible foreigners upon arrival



$$\log N_{it} = \alpha_0 + \beta \cdot \mathbb{1}[i=1] + \sum \gamma_t + e \cdot \log(1-\tau_{it}) + \nu_{it},$$

Identification Assumption:

Absent the reform, number of foreigners has same trend in the control (i = 0) and treatment (i = 1) group



Specifications of bunching estimates

Simple diff=Estimate models of the form:

$$c_{j} = \sum_{i=0}^{p} \alpha_{i}^{-} \cdot (z_{j})^{i} + \sum_{i=0}^{p} \alpha_{i}^{+} \cdot (z_{j})^{i} \cdot \mathbb{1}[z > \bar{z}] + \sum_{i=1}^{u} \gamma_{i} \cdot \mathbb{1}[z_{j} = i] + \nu_{j}$$

where [*I*, *u*] is the excluded range around the notch pointCompute counterfactual distribution:

$$\hat{c}_j = \sum_{i=0}^p \widehat{\alpha_i^-} \cdot (z_j)^i + \sum_{i=0}^p \widehat{\alpha_i^+} \cdot (z_j)^i \cdot \mathbb{1}[z > \overline{z}]$$

Missing mass:

$$\widehat{M} = rac{\sum_{i=l}^{ar{z}}(c_j - \hat{c}_j)}{\widehat{c}_{ar{z}}}$$

Bunching:

$$\widehat{B} = \frac{\sum_{i=\overline{z}}^{u} (\widehat{c}_{j} - c_{j})}{\widehat{c}_{\overline{z}}}$$

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Specifications (2): Diff-in-Diff bunching estimates

- Take advantage of counterfactual distribution prior to 1991:
- Estimate models of the form:

 $c_{j,t} = \sum_{i=0}^{p} \alpha_{i,t_1} \cdot (z_{j,t_1})^i + \widehat{\alpha_{0,t_2}}^n$ shift in the distribution over time $+ \sum_{i=0}^{p} \eta_{i,t_2} \cdot (z_{j,t_2})^i \cdot \mathbb{1}[z_{j,t_2} > \bar{z}] + \sum_{i=l}^{u} \gamma_i \cdot \mathbb{1}[z_{j,t_2} = i] + \nu_{jt} \quad (1)$

• $t = t_1$ is before, and $t = t_2$ is after the scheme was introduced

[I, u] is the excluded range around the notch point

▶ Return