

118TH CONGRESS  
1ST SESSION

# H. R. 3582

To amend the Internal Revenue Code of 1986 to exclude certain post-graduation scholarship grants from gross income in the same manner as qualified scholarships to promote economic growth.

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## IN THE HOUSE OF REPRESENTATIVES

MAY 22, 2023

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

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## A BILL

To amend the Internal Revenue Code of 1986 to exclude certain post-graduation scholarship grants from gross income in the same manner as qualified scholarships to promote economic growth.

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 “Workforce Develop-  
5 ment Through Post-Graduation Scholarships Act of  
6 2023”.

1 **SEC. 2. POST-GRADUATION SCHOLARSHIP GRANTS EX-**  
 2 **CLUDED FROM GROSS INCOME IN SAME MAN-**  
 3 **NER AS QUALIFIED SCHOLARSHIPS.**

4 (a) IN GENERAL.—Section 117(a) of the Internal  
 5 Revenue Code of 1986 is amended—

6 (1) by striking the period at the end and insert-  
 7 ing “, or”,

8 (2) by striking “any amount received” and in-  
 9 serting the following: “any amount which—

10 “(1) is received”, and

11 (3) by adding at the end the following new  
 12 paragraph:

13 “(2) is received as a post-graduation scholar-  
 14 ship grant paid on behalf of an individual.”.

15 (b) POST-GRADUATION SCHOLARSHIP GRANT.—Sec-  
 16 tion 117(b) of such Code is amended by redesignating  
 17 paragraph (2) as paragraph (3) and by inserting after  
 18 paragraph (1) the following new paragraph:

19 “(2) POST-GRADUATION SCHOLARSHIP  
 20 GRANT.—

21 “(A) IN GENERAL.—The term ‘post-grad-  
 22 uation scholarship grant’ means any grant pro-  
 23 gram—

24 “(i) which is established by an organi-  
 25 zation which—

1           “(I) is described in section  
2           501(c)(3) and exempt from tax under  
3           section 501(a), and

4           “(II) is either a private founda-  
5           tion or community trust described in  
6           section 170(b)(1)(A)(vi), (other than  
7           an organization established by an or-  
8           ganization described in section  
9           170(b)(1)(A)(ii) or an organization  
10          described in section 170(b)(1)(A)(iii)  
11          the principal purpose or function of  
12          which is the provision of medical edu-  
13          cation),

14          “(ii) under which, in accordance with  
15          the conditions of a grant, such organiza-  
16          tion repays any portion of an applicable  
17          education loan incurred by an individual,

18          “(iii) which requires a grantee to live  
19          and work in an applicable community,

20          “(iv) under which payments are made  
21          directly to the holder of the loan, and

22          “(v) which is not provided to an em-  
23          ployee of the granting organization or a re-  
24          lated entity of the granting organization.

1           “(B) APPLICABLE EDUCATION LOAN.—For  
2 purposes of subparagraph (A), the term ‘appli-  
3 cable education loan’ means, with respect to  
4 any individual, a qualified education loan (as  
5 defined in section 221(d)(1)) incurred to pay  
6 qualified higher education expenses (as defined  
7 in section 221(d)(2)) of such individual.

8           “(C) APPLICABLE COMMUNITY.—For pur-  
9 poses of subparagraph (A), the term ‘applicable  
10 community’ means any area that has a bach-  
11 elor’s degree attainment rate for the population  
12 that is below the state or national average for  
13 such population (as determined based on data  
14 collected by the Census Bureau).”.

15       (c) AMOUNT NOT TREATED AS TAXABLE EXPENDI-  
16 TURE BY PRIVATE FOUNDATION.—Section 4945(g) of  
17 such Code is amended by striking “or” at the end of para-  
18 graph (2), by striking the period at the end of paragraph  
19 (3) and inserting “, or”, and by adding at the end the  
20 following new paragraph:

21           “(4) the grant is a post-graduation scholarship  
22 grant (as defined in section 117(b)(2)).”.

23       (d) DENIAL OF DOUBLE BENEFIT.—Section 221(e)  
24 of such Code is amended by redesignating paragraphs (2)

1 and (3) as paragraphs (3) and (4), respectively, and by  
2 inserting after paragraph (1) the following new paragraph:

3           “(2) DENIAL OF DOUBLE BENEFIT IN CASE OF  
4           POST-GRADUATION SCHOLARSHIP GRANTS.—Any in-  
5           terest which is paid as part of a post-graduation  
6           scholarship grant and excluded from gross income  
7           under section 117 shall not be taken into account  
8           under this section.”.

9           (e) REGULATORY AUTHORITY.—Section 117 of such  
10 Code is amended by adding at the end the following new  
11 subsection:

12           “(e) REGULATIONS.—The Secretary shall prescribe  
13 such reporting requirements and regulations as may be  
14 necessary or appropriate to carry out subsection (a)(2).”.

15           (f) REPORTS.—

16           (1) SECRETARY OF TREASURY.—Not later than  
17           3 years after the date of the enactment of this Act,  
18           and periodically thereafter, the Secretary of the  
19           Treasury, or the Secretary’s delegate, shall submit  
20           to Congress a report on the implementation and ef-  
21           fectiveness of the amendments made by this section.

22           (2) COMPTROLLER GENERAL.—

23           (A) IN GENERAL.—Not later than 5 years  
24           after the date of enactment of this Act, the  
25           Comptroller General of the United States shall

1 publish the result of a study on post-graduation  
2 scholarship grants to which section 117 of the  
3 Internal Revenue Code of 1986 (as amended by  
4 this section) applies.

5 (B) CONTENTS OF REPORT.—The informa-  
6 tion published under subparagraph (A) shall in-  
7 clude the following:

8 (i) The length of time involved in such  
9 grants.

10 (ii) The amount paid out under such  
11 grants.

12 (iii) The disposition of any funds paid  
13 under such grants, including the identity  
14 of any loan holders who benefit from such  
15 funds.

16 (g) EFFECTIVE DATE.—The amendments made by  
17 this section shall apply to taxable years beginning after  
18 the date of the enactment of this Act.

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