# Individual Income Tax Rates and Tax Shares, 

 1994by Therese Cruciano

0f the nearly 116 million individual income tax returns filed for 1994, over 75 percent showed an income tax liability. The average tax rate on these taxable returns was 14.3 percent, 0.2 percentage points higher than for the previous year, and the average income tax per tax return was $\$ 6,104$, an increase of $\$ 287$ over the amount reported for 1993. Total income tax for these returns for 1994 increased 6.4 percent to $\$ 535$ billion, exceeding the growth rate of adjusted gross income less deficit (AGI), which increased more than 4.8 percent to $\$ 3,737$ billion. The increase in the average tax rate brought the rate to the highest level since 1986, the last year before enactment of the Tax Reform Act of 1986 (TRA86).

Between 1993 and 1994, the shares of AGI for returns of the top 1 percent and top 5 percent of tax filers ranked by size of income were nearly unchanged [1]. Returns in the top 1 percent of returns with positive AGI reported 13.8 percent of total AGI and 28.9 percent of total income tax for 1994, compared with 13.8 percent of AGI and 29.0 percent of total income tax for 1993. An AGI of at least $\$ 195,726$ placed an individual in the top 1 percent of taxpayers for 1994. The returns in the top 5 percent group reported 27.9 percent of the AGI and 47.5 percent of the total income tax (compared to 27.8 percent and 47.4 percent, respectively, for 1993). To be included in the top 5 percent of taxpayers for 1994 required an AGI of at least \$91,226.

This article discusses the individual income tax rates and tax shares and the computation of "total income tax" for Tax Year 1994. To put this discussion into perspective, the appendices to the article provide explanations of selected terms used for the article (Appendix A) and describe the income tax structure, certain tax law changes, income and tax concepts (the "1979 Income Concept," "modified" taxable income, and marginal tax rates), the computation of "alternative minimum taxable income," and the data sources and limitations.

## Major Tax Law Changes for 1994

The "earned income credit" (EIC) underwent several changes for 1994. For the first time, taxpayers without qualifying children could claim the credit. Taxpayers with earned income, between the ages of 25 and 64 , who had less than $\$ 9,000$ in both earned income and adjusted gross income, and who did not have a qualifying child were eligible for the earned income credit. These taxpayers

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completed the EIC Worksheet and claimed the credit on the Form 1040, Form 1040A, Form 1040EZ, or Form 1040 PC return. In order to claim the credit, working taxpayers with qualifying children had to have earned income and adjusted gross income less than $\$ 23,755$ for one qualifying child, or less than $\$ 25,296$ for two or more qualifying children. These taxpayers attached Schedule EIC to their Form 1040, Form 1040A, or Form 1040PC return. (For 1993 there was only a single eamed income and adjusted gross income eligibility level for all taxpayers.) In addition, the computation of the earned income credit changed; the health insurance credit and the extra credit for a child born during the year were both eliminated. (See Appendix B for a discussion of the 1994 income tax structure.)

Current-year moving expenses were no longer an itemized deduction on Schedule A. The deduction of qualified moving expenses as a statutory adjustment to AGI allowed taxpayers who used the standard deduction to deduct their current-year moving expenses. In order to deduct allowable moving expenses, the taxpayer's new job had to be at least 50 miles farther from his/her former home than their old job location. In addition, the following expenses were no longer deductible: meals while moving from the old residence to the new residence; travel expenses for pre-move house hunting trips; expenses while occupying temporary quarters in the area of the new job; and qualified residence sale, purchase, and lease expenses.
Beginning with 1994, certain taxpayers who received social security or equivalent "tier 1 railroad retirement benefits" had to include up to 85 percent of benefits received in their taxable income [2]. (See Appendix C for a listing of additional tax law changes.)

## Income Tax Rates

Discussions of income tax rates generally center on measuring two distinct tax rates: average tax rates and marginal tax rates. Average tax rates are calculated by dividing some measure of tax by some measure of income. For the statistics in this article, the average tax rate is defined as "total income tax" (the sum of "income tax after credits" and the "alternative minimum tax") divided by AGI reported on returns showing some income tax liability. Measures of marginal tax rates, on the other hand, focus on determining the tax rate imposed on the last (or next) dollar of income received by a taxpayer. For this article, the marginal tax rate is defined as the statutory rate at which the last dollar of taxable income is taxed. (See Appendix D for a more detailed explanation of marginal tax rates.) The following sections describe the measurement of the average and marginal tax rates in more detail and discuss the statistics based on these rates for 1994.

## Individual Income Tax Rates and Tax Shares, 1994

## figure A

Adjusted Gross Income, Total Income Tax, Average Tax Rate, and Average Total Income Tax, Tax Years 1985-1994 [Money amouns are in billions of dollars, excep where indicated]

| Tax year | Total number of retums | Taxable retums |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Number of returns | As a percentage of total retums ${ }^{1}$ | Adjusted gross income (less deficit) | Total income tax | Average tax rate (percent) ${ }^{2}$ | Average per retum ${ }^{3}$ |  |  |  |
|  |  |  |  |  |  |  | Current dollars |  | Constant dollars 4 |  |
|  |  |  |  |  |  |  | Adjusted gross income | Total income tax | Adjusted gross income | Total income tax |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
|  | Using each tax years adjusted gross income |  |  |  |  |  |  |  |  |  |
| 1985. | 101,660,287 | 82,846,420. | 81.5 | 2,259 | 326 | 14.4 | 27,268 | 3,931 | 25,342 | 3,653 |
| 1986. | 103,045,170 | 83,967,413 | 81.5 | 2,440 | 367 | 15.1 | 29,062 | 4,374 | 26,516 | 3,991 |
| 1987. | 106,996,270 | 86,723,796 | 81.1 | 2,701 | 369 | 13.7 | 31,142 | 4,257 | 27,414 | 3,747 |
| 1988.. | 109,708,280 | 87,135,332 | 79.4 | 2,990 | 413 | 13.8 | 34,313 | 4,738 | 29,005 | 4,005. |
| 1989. | 112,135,673 | 89,178,355 | 79.5 | 3,158 | 433 | 13.7 | 35,415 | 4,855 | 28,560 | 3,915 |
| 1990. | 113,717,138 | 89,862,434 | 79.0 | 3,299 | 447 | 13.6 | 36,711 | 4,976 | 28,088 | 3,807 |
| -1991................... | -114,730,123 | -88,733,587- | - 77.3 | -3,337 | 448 - | -13.4 | - 37,603 | 5,054 - - | --27,609- | -3,711- |
| 1992. | 113,604,503 | 86,731,946 | 76.3 | 3,484 | 476 | 13.7 | 40,168 | 5,491 | 28,630 | 3,914 |
| 1993. | 114,601,819 | 86,435,367 | 75.4 | 3,564 | 503 | 14.1 | -41,233 | 5,817 | 28,535 | 4,026 |
| 1994................... | 115,943,131 | 87,619,446 | 75.6 | 3,737 | 535 | 14.3 | 42,646 | 6,104 | 28,776 | 4,119 |
|  | Using 1979 Income Concept ${ }^{\text {s }}$ |  |  |  |  |  |  |  |  |  |
| 1985................... | 101,660,287 | 82,846,420 | 81.5 | 2,403 | 326 | 13.6. | 29,003 | 3,931 | 26,954 | 3,653 |
| 1986.................. | 103,045,170 | 83,967,413 | 81.5 | 2,703 | 367 | 13.6 | 32,194 | 4,374 | 29,374 | 3,991 |
| 1987. | 106,996,270 | 86,723,796 | 81.1 | 2,736 | 369 | 13.5 | 31,551 | 4,257 | 27,774 | 3,747 |
| 1988....... | 109,708,280 | 87, 135,332 | 79.4 | 3,011 | 413 | 13.7 | 34,556 | 4,738 | 29,210 | 4,005 |
| 1989....... | 112,135,673 | 89,178,355 | 79.5 | 3,188 | 433 | 13.6 | 35,752 | 4,855 | 28,832 | 3,915 |
| 1990....... | 113,717,138 | 89,862,434 | 79.0 | 3,335 | 447 | 13.4 | 37,108 | 4,976 | 28,392 | 3,807 |
| .1991... | -1.14,730,123 | -_88,733,587 | $\therefore 77.3$ | 3,387 | 448. | 13.2 . | -. 38,169.. | .-5,054 | 28,024 | 3,7.1. |
| 1992................... | 113,604,503 | 86,731,946 | 76.3 | 3,553 | 476 | 13.4 | 40,964 | 5,491 | 29,198 | 3,914 |
| 1993.................. | 114,601,819 | 86,435,367 | 75.4 | 3,625 | 503 | 13.9 | 41,938 | 5,817 | 29,023 | 4,026 |
| 1994.................. | 115,943,131 | 87,619,446 | 75.6 | 3,796 | 535 | 14.1 | 43,322 | 6,104 | 29,232 | 4,119 |

[^0]
## Average Tax Rafes

Statistics for 1985 through 1994 on income (based on each year's definition of AGI, as well as on the common 1979 Income Concept) and taxes reported are presented in Figure A. (See Appendix D for an explanation of the 1979 Income Concept.) These tax years can be partitioned into five distinct sub-periods:
(1) Tax Years 1985 and 1986 were the last two years under the Economic Recovery Tax Act of 1981 (ERTA81). The tax bracket boundaries, personal exemptions, and standard deductions were indexed for inflation and the maximum tax rate was 50 percent.
(2) Tax Year 1987 was the first year under TRA86. There was a one-year, transitional, five-rate tax bracket
structure and a partial phase-in of new provisions that broadened the definition of AGI. The maximum tax rate was 38.5 percent.
(3) During Tax Years 1988 through 1990, there was effectively a three-rate tax bracket structure [3]. The phase-in of the provisions of TRA86 continued, and the maximum tax rate was 33 percent.
(4) For Tax Years 1991 and 1992, there was a three-rate tax bracket structure ( 15,28 , and 31 percents), a limitation on some itemized deductions, and a phaseout of personal exemptions.
(5) For Tax Years 1993 and 1994, there was a five-rate tax bracket structure with a maximum statutory tax rate of 39.6 percent.

Over 87.6 million, or 75.6 percent, of the 115.9 million individual returns filed for Tax Year 1994 were "taxable returns." These taxable returns showed total AGI of $\$ 3,737$ billion, an increase of more than 4.8 percent from 1993; using the 1979 Income Concept, total income increased 4.7 percent to $\$ 3,796$ billion. Taxpayers reported $\$ 535$ billion in total income tax for 1994, approximately $\$ 32$ billion ( 6.4 percent) more than for 1993. Thus, for 1994, the growth of total income tax exceeded the growth of AGI by 1.5 percentage points.
In current dollars, average AGI and average total income tax both increased from 1993 to 1994. Average AGI increased 3.4 percent to $\$ 42,646$, while average tax increased 4.9 percent to $\$ 6,104$. However, after adjusting for inflation, average AGI $(\$ 28,776)$ continued to be less than its peak level of $\$ 29,005$ reported for Tax Year 1988 [4]. Yet, the average tax (in constant dollars) of $\$ 4,119$ for 1994 exceeds the 1988 amount of $\$ 4,005$, previously the highest level in recent years.

Because TRA86 reduced statutory tax rates and broadened the definition of AGI (by eliminating or limiting the preferential treatment of various tax items, such as restricting the use of "passive losses" to offset "non-passive income" and eliminating the beneficial tax treatment of net long-term capital gains), comparisons of average tax
rates before and after 1986, based on current-year definitions of AGI, become less meaningful [5]. The 1979 Income Concept provides a more consistent basis for such comparisons. Based on the 1979 Income Concept, average tax rates declined 0.1 percentage point from 13.6 percent for 1986 to 13.5 percent for 1987, increased to 13.7 percent for 1988, and declined again for the next three years, until reaching 13.2 percent for 1991 . The average tax rate rose to 13.4 percent for 1992, and continued to increase until reaching a level of 14.1 percent for 1994. The large increase in the average tax rate for 1993 ( 0.5 percentage points) coincided with the increased tax rates beginning with that tax year.
Using AGI, the average tax rate on taxable returns increased approximately 0.2 percentage points for 1994 to 14.3 percent, the highest level since 1986. However, the increase in the average tax rate for 1994 did not affect taxpayers in all income size classes (Figure B). Of the three income size classes that showed an increase in the average tax rate for 1994, all had small increases of approximately 0.1 percentage point. Furthermore, the " $\$ 1$ under $\$ 10,000$ " class showed a decrease in the average tax rate of approximately 0.2 percentage points. About half of the decrease in this income size class can be attributed to the increase in the earned income credit taken by individu-

## Figure B

Taxable Returns: Number of Returns, Adjusted Gross Income, and Total Income Tax, by Size of Adjusted Gross Income, Tax Years 1993 and 1994
[Number of returns is in thousands-money amounts are in millions of dollars]

| Tax year, income, and average tax | Total | Size of adjusted gross income |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Under \$11 | $\begin{gathered} \hline \$ 1 \\ \text { under } \\ \$ 10,000 \end{gathered}$ | $\begin{gathered} \$ 10,000 \\ \text { under } \\ \$ 20,000 \end{gathered}$ | $\begin{gathered} \$ 20,000 \\ \text { under } \\ \$ 30,000 \end{gathered}$ | $\begin{gathered} \$ 30,000 \\ \text { under } \\ \$ 50,000 \end{gathered}$ | $\begin{gathered} \$ 50,000 \\ \text { under } \\ \$ 100,000 \end{gathered}$ | $\begin{gathered} \$ 100,000 \\ \text { under } \\ \$ 200,000 \end{gathered}$ | $\begin{gathered} \$ 200,000 \\ \text { under } \\ \$ 500,000 \end{gathered}$ | $\begin{gathered} \$ 500,000 \\ \text { under } \\ \$ 1,000,000 \end{gathered}$ | $\begin{gathered} \$ 1,000,000 \\ \text { or } \\ \text { more } \end{gathered}$ |
| Tax Year 1994: <br> Number of taxable returns. $\qquad$ <br> Adjusted gross income <br> (less deficit) $\qquad$ | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) |
|  | 87,619 | 9 | 10,537 | 16,699 | 17.065 | 20,923 | 17,878 | 3,400 | 889 | 149 | 70 |
|  |  |  |  |  |  |  |  |  |  |  |  |
|  | 3,736,645 | -4,379 | 63,594 | 251,511 | 422,768 | 817,673 | 1,201,511 | 445,877 | 255,944 | 100,582 | 181,565 |
| Total income tax.................... | 534,85614.3 | 102$\left({ }^{2}\right)$ | 2,6024.1 | $\begin{array}{r} 17,543 \\ 7.0 \end{array}$ | $\begin{array}{r} 35,481 \\ 8.4 \end{array}$ | $\begin{array}{r} 85,474 \\ 10.5 \end{array}$ | $\begin{array}{r} 158,394 \\ 13.2 \end{array}$ | $\begin{array}{r} 82,665 \\ 18.5 \end{array}$ | $\begin{array}{r} 65,582 \\ 25.6 \end{array}$ | $\begin{array}{r} 30,376 \\ 30.2 \end{array}$ | $\begin{array}{r} 56,637 \\ 31.2 \end{array}$ |
| Average tax rate (percent).. |  |  |  |  |  |  |  |  |  |  |  |
| Tax Year 1993: | 86,435 | 5-8806 | 10,616 | 17,152 | 16,809 | 21,322 | 16,436 | 3,104 | 785 | 141 | 66 |
| Number of taxable returns....... |  |  |  |  |  |  |  |  |  |  |  |
| Adjusted gross income (less deficit) $\qquad$ | 3,563,976 |  | 64,757 | 258,789. | 414,731 | 830,595 | 1,099,056 | 407,472 | 227,774 | 94,264 | 170.433 |
| Total income tax.................... | 502,788 | 68 | 2,784 | 17,854 | 35,040 | 86,752 | 145,134 | 75,285 | 58,280 | 28,345 | 53,246 |
| Average tax rate (percent)....... | 14.1 | ${ }^{(2)}$ | 4.3 | 6.9 | 8.4 | 10.4 | 13.2 | 18.5 | 25.6 | 30.1 | 31.2 |
| Increase in average tax rates, 1994 over 1993. $\qquad$ | 0.2 | (3) | -0.2 | 0.1 | -- | 0.1 | - | - | - | 0.1 | -- |

[^1]
## Figure $\mathbf{C}$

Returns With Modified Taxable Income: Income Tax Generated at Each Marginal Rate on Retums With the Indicated Marginal Tax Rate, Tax Year 1994
[All figures are estimates based on samples-money amounts are in thousands of dollars]


[^2]als in this class. The amount of the earned income credit used to offset income tax before credits for the taxpayers in this income size class increased $\$ 84.9$ million, from $\$ 8.9$ million for 1993 to $\$ 93.8$ million for 1994. The increase in the earned income credit for this group of taxpayers was mostly due to the 1994 change in law allowing certain taxpayers without children to claim the earned income credit [6]. (See the Major Tax Law Changes for 1994 section of this article for a description of the changes to the earned income credit.)
Overall, the average tax rate increased for 1994. This increase was most likely the result of an increased number of taxpayers and their corresponding AGI as reported in the five highest income size classes, producing a higher total income tax. The number of taxable returns for 1994 increased 1.4 percent, whereas the number of returns reporting AGI of $\$ 50,000$ or more increased 9.0 percent. Likewise, AGI on all taxable returns increased 4.8 percent, while on returns for taxpayers reporting AGI of $\$ 50,000$ or more it increased 9.3 percent. Accordingly, for 1994, more taxpayers moved into higher brackets, facing higher marginal tax rates and higher average taxes.

## Marginal Tax Rate Classifications

The highest statutory tax rate bracket applicable to a tax return was defined as the marginal tax rate for the statistics presented in Figures C and D, as well as in Table 1. These statistics were based on individual income tax returns showing an amount for "tax generated" on taxable income
and items of income that were subject to the regular income tax, generally those included in AGI [7]. Tables 2 and 3 contain additional statistics based on marginal tax rates. These tables present statistics on the income and tax generated at each marginal tax rate by size of AGI(Table2) and by filing status (Table 3). Details on the determination of the marginal tax rate bracket into which a return is assumed to fall are explained in Áppendix D.

For 1994, over $\$ 540.9$ billion in income taxes was generated from 92.7 million individual returns with modified taxable income totaling $\$ 2,598.2$ billion. The amounts and percentages of modified taxable income and income tax generated (before reduction by tax credits, including the earned income credit) by the marginal rate categories (defined in Appendix D) are presented in Figure C. Approximately 72.2 percent of the returns, classified in the " 15 percent" and " 15 percent (Form 8814)" marginal rate categories, reported 32.3 percent of the modified taxable income and generated 23.3 percent of the tax. The 23.8 percent of the returns in the " 28 percent" and " 28 percent (capital gains)" categories reported 40.7 percent of the modified taxable income and 37.7 percent of the tax. The returns in the " 31 percent " classification, reported 8.4 percent of the modified taxable income and generated 9.8 percent of the income tax, while the returns in the " 36 percent" classification showed 6.2 percent of the modified taxable income and 8.4 percent of the income tax generated. The 0.5 percent of the returns in the " 39.6 percent" marginal tax rate category reported 12.3 percent of the

## Figure D

Returns With Modified Taxable Income: Percentages of Returns, Modified Taxable Income, and Income Tax Generated by Marginal Tax Rate Classification, Tax Years 1992-1994


Modified Taxable Income


Income Tax Generated
Percentage


'includes 28\% with net long-term capital gains.
NOTE: Retums in the "Form 8615 " and "Form 8814 " categories were included in the calculation of the percentages, but are not shown separately.
modified taxable income and 20.7 percent of the tax. The remaining returns--those in the "Form 8615" category-reported 0.1 percent of the modified taxable income and 0.1 percent of the income tax generated.

Changes in the distribution of percentages of tax returns, modified taxable income, and income tax generated among the various marginal tax rate classifications over Tax Years 1992, 1993, and 1994 are illustrated in Figure D. While the effect of the new higher statutory tax rate brackets for 1993 is apparent, the changes in distribution percentages between 1993 and 1994 are not as dramatic.
In spite of small year-to-year changes, the percentages of returns in the " 15 percent" and " 28 percent" marginal tax rate categories generally held steady. Over this threeyear period, the percentage shares of modified taxable income deçreased $0: 3$ percentage points in the " 15 percent" category, increased 0.5 percentage points in the " 28 percent" category, and decreased 0.3 percentage points in the categories above " 28 percent". Between 1993 and 1994, percentage shares of modified taxable income increased 0.4 percentage points in the " 36 percent" category, and increased 0.2 percentage points in the " 39.6 percent" category.

When examining percentage shares of income tax generated between 1992 and 1994, the changes are similar, but larger. The percentage shares of income tax generated decreased in both the " 15 percent" classification ( 1.0 percentage point) and the " 28 percent" classification ( 0.5 percentage points). The shares of income tax generated by the classifications above " 28 percent" increased 1.6 percentage points, with a 1.2 -percentage-point increase for 1993, coinciding with the new higher marginal tax rates. The rest of this increase ( 0.4 percentage points) occurred between 1993 and 1994, when percentage shares of income tax generated increased 0.5 percentage points and 0.3 percentage points in the " 36 percent" and the " 39.6 percent" categories, respectively. Thus, 1994 continued the increase in shares of income tax generated by individuals in the two highest income tax brackets.

## Components of Tofal Income Tax

## Regular Tax

Regular tax is generally tax determined from a taxpayer's taxable income on the basis of statutory tax rates less any applicable tax credits. It does not include the "alternative minimum tax" (AMT). The derivation of aggregate total income tax for Tax Year 1994 returns with modified taxable income is illustrated in Figure E. Table 1 includes two tax amounts: "tax generated" and "income tax after -credits." Tables 5 through 8 and Figures A and B include an additional measure of tax, "total income tax."

As shown (Figure E and column 5 of Table 1), the tax generated by applying statutory income tax rates to modified taxable income was $\$ 540.9$ billion. For most taxpayers, tax generated was equal to income tax before credits.

## Figure E

Derivation of Tax Year 1994 Total Income Tax as Shown in Statistics of Income
[Money amounts are in billions of dollars]

| Tax generated from tax rate schedules or tax table. $\qquad$ | 540.9 |
| :---: | :---: |
| PLUS: Taxes from special computations, total......................... | 0.6 |
| Tax on accumulation distributions of trusts ......................... | (') |
| Tax on lump-sum distributions from qualified retirement plans. $\qquad$ | (1) |
| EQUALS:--- |  |
| Income tax before credits...................................................... | 541.6 |
| LESS: Tax credits, total.: | 8.9 |
| Child-care credit......... | 2.5 |
| Foreign tax credit............................................................. | 2.3 |
| General business credit..................................................... | 0.7 |
| Elderly or disabled credit................................................... | $\left({ }^{2}\right)$ |
| Earned income credit (limited to the amount needed to reduce total income tax to zero) | 2.8 |
| Credit for prior-year minimum tax........................................ | 0.4 |
| Other credits..................................................................... | 0.1 |
| EQUALS: |  |
| Income tax after credits.................................................................... | 532.6 |
| PLUS: Alternative minimum tax.............................................. | 2.2 |
| EQUALS: |  |
| Total income tax...................................................................... | 534.8 |

${ }^{1}$ Not tabulated.
2 Less than 0.1 billion.
NOTE: Detail may not add to totals because of rounding.

However, for others, income tax before credits included special taxes on accumulation distributions of trusts and lump-sum distributions from qualified retirement plans (when the special 5 - or 10 -year averaging method was used) [8]. The earned income credit is included in this computation to the extent that its application did not reduce income tax before credits below zero. Any portion of the EIC which is refundable to the taxpayer and any portion of the EIC used to reduce other taxes are excluded from the computation of income tax after credits [9]. Income tax after credits (Figure E and column 7 of Table 1) totaled $\$ 532.6$ billion. Total income tax of $\$ 534.8$ billion (Figure A and Tables 5 through 8) is thus the sum of income tax after credits and the alternative minimum tax [10].
Statistics on the type of tax computation for returns with modified taxable income are provided in Table 4. For 1994, nearly 249 thousand returns were filed by children under age 14 with investment income over $\$ 1,200$. Using

## Figure $F$

Returns With Alternative Minimum Tax: Selected Data from Alternative Minimum Tax Computation, by Size of Adjusted Gross Income, Tax Years 1993 and 1994
[Money amounts are in thousands of dollars]

| Size of adjusted gross income | Total adjustments and preferences |  | Altemative minimum taxable income |  | Altemative minimum tax |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Amount | Number of returns | Amount | Number of returns | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
|  | Tax Year 1994 |  |  |  |  |  |
| All returns............................. | 4,160,580 | 56,998,374 | 4,161,878 | 478,201,308 | 368,964 | 2,212,094 |
| No adjusted gross income. | 100,868 | 1,278,768 | 101,040 | -5,747,807 | 3,166 | 100,250 |
| \$1 under \$10,000.............. | 443,248 | 1,299,463 | 443,248 | 1,434,791 | 20,774 | 16,975 |
| \$10,000 under \$20,000.. | 392,625 | 1,835,739 | 392,625 | 4,791,107 | 2,644 | 6,247 |
| \$20,000 under $\$ 30,000$.. | 267,711 | 1,407,829 | 267,712 | 5,788,317 | 5,351 | 10,852 |
| \$30,000 under \$40,000 ... | 295,616 | 1,909,780 | 295,616 | 9,375,200 | 8,248 | 17,255 |
| \$40,000 under \$50,000... | 320,403 | 1,743,494 | 320,702 | 12,843,190 | 4,591 | 18,142 |
| \$50,000 under \$75,000................. | 669,803 | 5,238,086 | 669,803 | 36,874,018 | 39,513 | 44,597 |
| \$75,000 under \$100,000..................... | 426,060 | 4,423,407 | 426,060 | 32,720,568 | 50,159 | 129,557 |
| \$100,000 under \$200,000.................... | 710,472 | 10,310,768 | 711,152 | 88,246,979 | 116,434 | 381,353 |
| \$200,000 under \$500,000.................... | 400,452 | 11,628,146 | 400,503 | 110,042,300 | 91,724 | 726,002 |
| \$500,000 under \$1,000,000................. | 84,351 | 5,163,008 | 84,407 | 53,787,085 | 18,451 | 313,470 |
| \$1,000,000 or more............................ | 48,970 | 10,759,884 | 49,007 | 128,045,558 | 7,908 | 447,392 |
| All returns...................................... | Tax Year 1993 |  |  |  |  |  |
|  | 3,670,697 | 53,571,103 | 3,673,531 | 445,835,134 | 334,615 | 2,052,790 |
| No adjusted gross income.................... | 97,664 | 742,421 | 96,465 | -6,574,981 | 3,227 | 66,287 |
| \$1 under \$10,000............................... | 315,525 | 962,639 | 315,525 | 1,110,406 | 21,820 | 5,613 |
| \$10,000 under \$20,000....................... | 294,400 | 1,506,523 | 294,400 | 3,648,137 | 3,492 | 16,681 |
| \$20,000 under \$30,000....................... | 263,740 | 1,205,728 | 264,705 | 5,655,908 | 1,600 | 4,245 |
| \$30,000 under \$40,000....................... | 287,548 | 1,509,200 | 287,548 | 8,965,196 | 2,964 | 11,210 |
| \$40,000 under \$50,000....................... | 294,745 | 1,602,231 | 294,745 | 11,749,970 | 6,142 | 8,752 |
| \$50,000 under \$75,000...................... | 587,914 | 4,428,102 | 588,913 | 32,593,726 | 33,284 | 62,381 |
| \$75,000 under \$100,000...................... | 386,942 | 3,929,917 | 386,942 | 29,711,481 | 47,118 | 110,200 |
| \$100,000 under \$200,000................... | 641,968 | 9,810,616 | 643,318 | 80,297,012 | 104,905 | 384,454 |
| \$200,000 under \$500,000.................... | 369,145 | 10,851,875 | 83,760 |  | 84,731 | 658,671 |
| \$500,000 under \$1,000,000................. | 83,597 47511 | $5,363,325$ $11,658,527$ |  | $53,071,682$ $124,140,713$ | 17,626 7,706 | 290,786 |
| \$1,000,000 or more.......................... | 47,511 | 11,658,527 | 47,580 | 124,140,713 | 7,706 | 433,509 |

NOTE: Detail may not add to totals because of rounding.

Form 8615 to compute their tax, these children showed $\$ 435: 4$ million in tax generated (column 7). If these same children had had all their income taxed as ordinary income, income tax before credits (regular tax computation) would have totaled $\$ 328.7$ million (column 6). Thus, the difference resulting from the special tax computation was over $\$ 106.6$ million (column 8 ) in additional tax [11].

Over 1.5 million returns using the Schedule D capital gains tax computation generated $\$ 112.6$ billion in tax (column 7). However, if long-term capital gains had been taxed the same as ordinary income (i.e., at a rate greater than 28 percent), the amount of income tax before credits (regular tax computation) for these same taxpayers would have been $\$ 120.6$ billion (column 6). Therefore, the reduction resulting from use of the Schedule $D$ tax computation was nearly $\$ 8.1$ billion (column 8 ), compared with the $\$ 7.2$ billion shown for 1993 (column 4).

## Alfernafive Minimum Tax

The alternative minimum tax was established by the Revenue Act of 1978, to ensure that a minimum amount of income tax was paid by taxpayers who might otherwise use certain provisions of the tax code meant to stimulate economic activity and generate "economic income" to reduce, or even eliminate, their regular tax liability. The AMT provisions may recapture some of these tax reductions by recomputing income to achieve "alternative minimum taxable income," or AMTI, the tax base for AMT. Form 6251, Alternative Minimum Tax--Individuals is used to calculate AMT. (See Appendix E for an explanation of the computation of AMTI.)

There were some minor changes in the AMT calculation for Tax Year 1994. For Tax Years beginning after 1993, taxpayers were required to use regular tax AGI instead of alternative tax AGI (ATAGI) when calculating AMTI
[12]. The limit on the exclusion benefit of the preference for intangible drilling costs increased from 30 percent to 40 percent of AMTI, with certain adjustments. In addition, distributions received from a cooperative (unless deemed nontaxable) were included as an adjustment in figuring AMTI.

Statistics, by size of AGI, on the AMT reported by taxpayers filing Form 6251 with their return are presented in Figure F. For 1994, an AMT liability exceeding \$2.2 billion was reported based on AMTI of $\$ 478.2$ billion. The AMT amount for 1994 represents a 7.8 percent increase from the nearly $\$ 2.1$ billion in AMT for 1993 based on $\$ 445.8$ billion of AMTI. For 1994, the amount of total adjustments and preferences was nearly $\$ 57.0$ billion, an increase of 6.4 percent from 1993. The three highest income size classifications ( $\$ 200,000$ or more) showed an increase in the amount of AMT between 1993 and 1994. The " $\$ 200,000$ under $\$ 500,000$ " income size class reported the largest ( 10.2 percent) increase in AMT. The two higher income size classes, " $\$ 500,000$ under $\$ 1,000,000$ " and " $\$ 1,000,000$ or more", showed AMT increases of 7.8 percent and 3.2 percent, respectively.

The marginal tax rate, capital gains rate, AMT rate, and the amount of AMT reported over the decade are shown in Figure G. For 1985, when the top marginal tax rate was 50 percent and the top capital gains rate and top AMT rate were both 20 percent, the-AMT reported was almost $\$ 3.8^{-}$

## Figure $\mathbf{G}$

Marginal Tax Rate, Capital Gains Rate, Alternative Minimum Tax Rate, and Alternative Minimum Tax, Tax Years 1985-1994

| Tax year | Highest marginal tax rate | Top capital gains rate | Top alternative minimum tax rate | Altemative minimum tax |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | Number of returns | Amount |
|  | (1) | (2) | (3) | (4) | (5) |
| 1985. | 50.0 | 201 | 20 | 427,688 | 3,791,672 |
| 1986..... | 50.0 | 201 | 20 | 608,907 | 6,713,149 |
| 1987. | 38.5 | 28 | 21 | 139,779 | 1,674,898 |
| 1988. | 28.01 | $28^{2}$ | 21 | 113,562 | 1,027,884 |
| 1989..... | $28.0{ }^{1}$ | 282 | 21 | 117,483 | 831,012 |
| 1990........ | $28.0{ }^{1}$ | 288 | 21 | 132,103 | 830,313 |
| 1991....... | 31.0 | 28 | 24 | 243,672 | 1,213,426 |
| 1992..... | 31.0 | 28 | 24 | 287,183 | 1,357,063 |
| 1993...... | 39.6 | 28 | 28 | 334,615 | 2,052,790 |
| 1994... | 39.6 | 28 | 28 | 368,964 | 2,212,094 |

'This tax rate was based on 60 percent of long-termcapital gains (in excess of short-
term capital losses) exduded from income. The remaining 40 percent of capital gains was taxed at the maximum rate of 50 percent, creating a top capital gains rate of 20 percent.
${ }^{2}$ The tax rate schedule provided only two basic rates: 15 percent and 28 percent. However, taxable income between certain amounts was subject to an additional 5 percent tax, creating an "effective" 33 percent tax rate.
billion. Taxpayers were able to exclude 60 percent of their long-term capital gains (in excess of short-term capital losses) from AGI, but these capital gains were added back when computing AMT. For 1986, after TRA86 was introduced, but before it became effective, the AMT liability increased to over $\$ 6.7$ billion. This increase was at least partially attributed to transactions undertaken as the result of changes which became effective the following year. After 1986, both the top capital gains rate and the top AMT rate increased, while the top marginal ordinary tax rate declined. In addition, capital gains were now fully included in AGI. For 1987, AMT decreased dramatically to $\$ 1.7$ billion. During the period from 1988 to 1990, as the top marginal and capital gains rates were 28 percent and the top AMT rate was 21 percent, AMT continued to decrease, to a low of $\$ 830.3$ million for 1990 . For 1991, when the AMT rate increased to 24 percent, the AMT increased 46.1 percent to $\$ 1.2$ billion. For 1993, when the top marginal tax rate and the top AMT rate increased again (while the top capital gains rate remained the same), the AMT liability increased 51.3 percent to nearly $\$ 2.1$ billion. For 1994, AMT exceeded $\$ 2.2$ billion, the highest level reported since 1986.

## Income and Tax Shares

Historical statistics on income and tax by cumulative percentiles (based on numbers of returns) are presented in Tables 5 through 8. Distributions of AGI, as defined for each year, and tax, by descending and ascending cumulative percentiles of returns, are presented in Tables 5 and 6. These tables can be used to make comparisons across cumulative percentile classes within each year, among years within the ERTA81 period (i.e., Tax Years 1982 through 1986), and among years within the post-TRA86 period (i.e., Tax Years 1987 through 1994). Since AGI was redefined under TRA86, Tables 5 and 6 are not as useful for comparisons between pre- and post-TRA86 years. Thus, tables 7 and 8 , which are based on a consistent definition of income (i.e., using the 1979 Income Concept), are included to facilitate such comparisons.

Tables 5 and 7 are based on percentiles of returns cumulated downward from the highest income returns. The data are shown for the top $1,5,10,25$, and 50 percents of returns. In contrast, Tables 6 and 8 are based on returns cumulated upward for the lowest income returns. Data are shown for the bottom $50,75,90,95$, and 99 percents of all returns.
For example, consider the data in Table 5 for the almost 115.0 million returns filed for 1994 with positive AGI. The average tax rate for these returns was 13.5 percent, the highest level since 1986 ( 14.5 percent). For 1994, the
returns in the top 1 percentile reported 13.8 percent of total AGI and almost 28.9 percent of total income tax. The amount of AGI needed for inclusion in this percentile group (i.e., the AGI floor) was \$195,726. For 1993, the returns in this same percentile group (i.e., those with at least $\$ 185,715$ in AGI) reported the same 13.8 percent of total AGI while accounting for 29.0 percent of total income tax. For 1994, the returns in the top 5 percentile group (returns reporting AGI of $\$ 91,226$ or more) reported 27.9 percent of total AGI and 47.5 percent of total income tax, only 0.1 percentage point higher than the 27.8 percent and 47.4 percent, respectively, for 1993 (when the AGI floor was $\$ 87,386$ ). The returns in the top 10 percentile group (returns with AGI of at least $\$ 68,753$ ) showed 39.2 percent of AGI and 59.5 percent of total income tax. For 1993, the returns in this percentile group (with AGI of $\$ 66,077$ or more) reported 39.1 percent of total AGI and 59.2 percent of total income tax.

The statistics by percentile in Tables 5 and 6 (for years prior to 1991) and Tables 7 and 8 (for years prior to 1994) were estimated, using a mathematical technique called "osculatory interpolation," applied to aggregated data tabulated by income size classes, in order to distribute the tax returns within each class [13]. For 1991 and later years, the statistics by percentiles in Tables 5 and 6 (and Tables 7 and 8 for 1994) were computed based on an actual ranking of the returns in the statistical sample that served as the basis for Individual Statistics of Income estimates. The differences under the two methods were judged to be minor enough so that the pre-1991 and post1990 data are believed to be comparable.

## Notes and References

[1] The percentile groupings of tax filers exclude returns with zero or negative AGI.
[2] Using a worksheet, taxpayers who had income in addition to any benefits received, calculated their "modified income" and compared it to both a base amount and an adjusted base amount. (In contrast to AGI, "modified income" includes tax-exempt interest, excludable interest from U.S. savings bonds reported on Form 8815 , one-half of total social security benefits, and the foreign-earned income exclusion, and excludes the foreign housing deduction.) If the "modified income" was between $\$ 32,000$ and $\$ 44,000$ for married taxpayers filing jointly, or between $\$ 25,000$ and $\$ 34,000$ for all other taxpayers (except married taxpayers filing separately who lived with their spouse anytime during the year and had a base
amount of zero), 50 percent of the income over the base, but not more than 50 percent of the benefits received, was taxable. If the "modified income" exceeded the base amounts of $\$ 44,000$ for married taxpayers filing jointly, or $\$ 34,000$ for all other taxpayers (except married taxpayers filing separately who lived with their spouse anytime during the year and had a base amount of zero), $\$ 6,000$ for married taxpayers filing jointly ( $\$ 4,500$ for all other taxpayers), plus 85 percent of the income above the $\$ 44,000$ or $\$ 34,000$ threshold was taxable, with the taxable amount limited to 85 percent of social security benefits. If the "modified income" amount was less than the base amount, none of the benefits were taxable. Prior to 1994, a maximum of 50 percent of social security or tier 1 railroad retirement benefits was included in AGI.
[3] For Tax Years 1988 through 1990, the tax rate schedules provided only two basic rates: 15 and 28 percents. However, taxable income over certain levels was subject to a 33 percent tax rate, to phase out the benefit of the 15 percent tax bracket (as compared to the 28 percent rate) and the deduction for personal exemptions. At the taxable income level where these benefits were completely phased out, the tax rate returned to 28 percent.
[4] Inflation-adjusted constant dollars are based on the Consumer Price Index (CPI-U, 1982-84=100) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, Monthly Labor Review.

| Year | CPI-U | Year | CPI-U |  |
| :--- | :--- | :--- | :--- | :--- |
| 1994 | 148.2 | 1989 | 124.0 |  |
| 1993 | 144.5 |  | 1988 | 118.3 |
| 1992 | 140.3 |  | 1987 | 113.6 |
| 1991 | 136.2 |  | 1986 | 109.6 |
| 1990 | 130.7 | 1985 | 107.6 |  |

[5] For further information on the Tax Reform Act of 1986, see U.S. Congress, Joint Committee on Taxation, General Explanation of the Tax Reform Act of 1986 (H.R. 3838, 99th Congress, Public Law 99-514), May 4, 1987.
[6] The total earned income credit for individuals in the " $\$ 1$ under $\$ 10,000$ " income size class increased from $\$ 6.4$ billion for 1993 to $\$ 8.6$ billion for 1994 . The portion of the earned income credit used to offset income tax before credits for this income size class increased from $\$ 8.9$ million for 1993 to $\$ 93.8$ million
for 1994. For the taxpayers in this income size class claiming the credit without a qualifying child (1994 only), the earned income credit was $\$ 680.2$ million and the portion of the earned income credit used to offset income tax before credits was $\$ 84.2$ million. These amounts are from the statistics shown in Table 2.5 in Statistics of Income--Individual Income Tax Returns--Publication 1304 for 1993 and 1994.
[7] Nontaxable (i.e., tax-exempt) forms of income, such as interest on state and local government obligations, were not included in AGI and generally did not affect the marginal tax rate. However, the receipt of some forms of tax-exempt income could have influenced the taxability of other income, such as social security benefits. When this situation occurred, the income made taxable by the receipt of other forms of nontaxable income was included in AGI.
[8] The income amounts on which these special computations were based were not reflected in current-year AGI or current-year taxable income.
[9] For 1994, the total earned income credit was $\$ 21.1$ billion. This amount includes the amount used to reduce the regular income tax ( $\$ 2.8$ billion), the amount used to reduce other taxes reported on individual-income tax returns.(\$1.7 billion), and theamount refunded to taxpayers ( $\$ 16.6$ billion). These amounts are shown in Table 2.5 in Statistics of Income--Individual Income Tax Returns 1994--Publication 1304.
[10] Total income tax does not include certain other taxes reported on the individual income tax return, such as self-employment tax (the social security tax on income from self-employment), the social security tax on certain tip income, tax from the recapture of prior-year investment or low-income housing credits, and tax applicable to early withdrawals from an Individual Retirement Arrangement (IRA) or other qualified retirement plans. These taxes are included in the statistics for "total tax liability," which are shown in Statistics of Income--Individual Income Tax Returns 1994--Publication 1304. For Tax Year 1994, total tax liability reported on $89,816,586$ returns was $\$ 561.0$ billion.
[11] The difference resulting from the special tax computation does not reflect the provisions of TRA86, which lowered standard deductions for dependents (compared to other taxpayers) and prevented these children from claiming their own personal exemption.
[12] Before 1994, taxpayers computed an alternative tax AGI (ATAGI) by adding certain investment interest, various adjustments and preferences, and net operating loss deduction to AGI, then subtracting tax refunds and the alternative tax net operating loss deduction. The ATAGI was the basis used when income or deduction items, based on a limit of income, were refigured for AMT purposes. Beginning with 1994, AGI was used when income or deduction items, based on limits of income, had to be refigured for AMT purposes.
[13] For an explanation of the osculatory interpolation technique, see Oh, H. Lock, "Osculatory Interpolation with a Monotonicity Constraint," 1977 Proceed--ings of the American Statistical Association, Section on'Stātisticical Compūting, 1978.

## Appendix A: Explanation of Selected Terms

Brief explanations of the major tax concepts discussed in this article are provided. For more extensive definitions, see Section 4 in Statistics of Income--Individual Income Tax Returns 1994--Publication 1304.
Adjusted Gross Income--Adjusted gross income is "total income," as defined by the tax code, less "statutory adjustments" (primarily business, investment, or employeerelated deductions, such as payments to a Keogh selfemployed retirement plan and certain deductible contributions to an Individual Retirement Arrangement or IRA, and self-employed health insurance deductions). Total income includes, for example, salaries and wages, taxable interest, dividends, alimony, and the net amounts from sources such as business income, rents and royalties, and sales of capital assets.
Difference Due to Special Tax Computation--For this article, the tax difference is the amount of tax resulting from using the provisions of one of the special tax computations (Form 8615 or Schedule D) less the amount of tax that would have resulted from not having used these provisions (regular tax computation).

Form 8615 Tax Computation--Form 8615 was used to compute the tax on investment income of children under age 14 who had investment income of more than $\$ 1,200$.
Income Tax Before Credits (Regular Tax Computation)-This amount consisted of the tax liability on ordinary income, computed by using the tax table or applying the rates from one of the four tax rate schedules, plus any additional taxes (tax on accumulation distributions of trusts and tax on lump-sum distributions from qualified retirement plans). When Form 8615 tax was payable on investment income of children, for this concept, all the income was taxed at the child's rate rather than at the rate
of the parents. When Schedule D tax was payable on net long-term capital gains, the tax was based on the regular tax rates rather than the 28 percent tax rate for capital gains.

## Marginal Tax Rate--See Appendix D.

Modified Taxable Income--See Appendix D.
Regular Tax Computation --Depending on marital status and size of taxable income, the taxpayer used the tax table or applied the rates from one of the four tax rate schedules to determine tax. Returns of taxpayers who had taxes computed by the Internal Revenue Service were classified under the regular tax computation method.

Schedule D Tax Computation --Schedule D was used to compute the 28 percent tax on net long-term capital gains (in excess of net short-term capital losses). For 1994, any investment interest used for itemized deductions (Schedule A) was excluded from this computation.

Taxable Income--Taxable income is AGI less the sum of personal exemption amounts and either the standard deduction for non-itemizers or total itemized deductions. The amounts for personal exemptions and total itemized deductions are net of any reductions because of a taxpayer's high income.

Taxable Returns--A return is classified as "taxable" based on the presence of "total income tax" (the sum of income tax after credits and the alternative minimum tax). The following additional taxes were not taken into account for this purpose: self-employment, social security, or Railroad Retirement Tax Act (RRTA) taxes, tax from recomputing prior-year investment or low-income housing credits, penalty taxes on Individual Retirement Arrangements, section 72 penalty taxes, advance earned income credit payments, or "golden parachute" payments (made to key employees as compensation under certain circumstances).

Tax Generated--This is the amount of tax computed on modified taxable income either from the tax rate schedules or the tax table. Tax generated does not take into account the alternative minimum tax or the effect of tax credits.
For most returns (those without the special taxes on lumpsum distributions from qualified retirement plans or on accumulation distributions of trusts), tax generated equals "income tax before credits."

Total Income Tax--Total income tax is the sum of income tax after credits and the alternative minimum tax.

## Appendix B: Income Tax Structure

Each year, taxpayers must file an income tax return if they meet certain minimum filing requirements. The filing requirements for 1994 were based on the amount of "gross income," filing status, age, and, to a lesser extent, on
dependency and blindness [B1]. Generally, the minimum level of income for which a return was required to be filed equaled the sum of the standard deduction for the particular filing status and the amount of the personal exemption deduction allowed for the taxpayer or taxpayers (but not for any dependents). In addition to the general filing requirements, individuals were required to file a return for Tax Year 1994 if they had net earnings from self-employment of at least $\$ 400$; liability for social security or Medicare tax on unreported tip income; social security, Medicare, or railroad retirement tax on reported tip income or group-term life insurance; "alternative minimum tax"; tax on a qualified retirement plan, including an Individual Retirement Arrangement or IRA; tax on the recapture of investment credit or low-income housing credit; recapture tax on the disposition of a home purchased with a Feder-ally-subsidized mortgage; any advance earned income credit payments; or wages of $\$ 108.28$ or more from a church or qualified church-controlled organization that was exempt from social security taxes.
Gross income includes all income, received in the form of money, goods, property, or services, that was not expressly exempt from tax [B2]. Adjusted gross income (AGI) is equal to gross income less deductions for certain expenses [B3]. "Taxable income," the base on which income tax before credits is computed, equals AGI less the amount for personal exemptions and less either total allowable itemized deductions for taxpayers who itemize deductions, or the standard deduction (including the additional amounts for age and blindness) for all other taxpayers.
Income tax before credits is calculated from taxable income using: the tax table or tax rate schedules, both of which vary with taxpayer filing status (single, married filing jointly, surviving spouse, married filing separately, and head of household); Form 8615 or Form 8814 for children's investment income; Schedule D worksheet for net long-term capital gains; or some combination of the above [B4]. For 1994, the tax rates for each filing status were $15,28,31,36$, and 39.6 percents, with a maximum rate of 28 percent on net long-term capital gains (in excess of net short-term capital losses).
To calculate their Federal income tax liability for 1994, taxpayers used either the tax table or the tax rate schedules. Taxpayers with taxable income less than $\$ 100,000$ were required to use the tax table, while those with taxable income of $\$ 100,000$ or more were required to use the tax rate schedules. The tax table was based on income tax "brackets" up to $\$ 50$ wide [B5]. The tax within each bracket was based on the tax calculated at the midpoint of the bracket and then rounded to the nearest whole dollar.

As a result, the tax table and the tax rate schedules could produce slightly different amounts of tax for the same amount of taxable income. Use of the tax table could have produced either a slightly higher or lower amount of tax than that produced by the tax rate schedules. For taxpayers using the tax table with taxable income that was subject to the 36 percent marginal rate, the maximum difference in tax between the tax rate schedules and the tax table was $\$ 8.89$ [B6]. However, the actual difference in tax was smaller for almost all taxpayers.

## Notes to Appendix B

[B1] Taxpayers fall into one of five filing statuses: single, married filing jointly, married filing separately, head of household, and surviving spouse. Being age 65 or older or being legally blind affects the amount of the standard deduction and, hence, the filing requirements. Those taxpayers who are (or could be) dependents of other taxpayers have different filing requirements. For more information on the general filing requirements for 1994, see Statistics of Income-Individual Income Tax Returns 1994--Publication 1304 or U.S. Department of the Treasury, Internal Revenue Service, Your Federal Income Tax/For use in preparing 1994 Reeturns-- Publication 17.
[B2] As defined under section 61-of the Internal Revenue Code, gross income includes amounts from wages and salaries, interest and dividends, alimony, bartering income, canceled debt income, gambling winnings, rents and royalties, and gains from property sales or exchanges, as well as gross profits from sole proprietorships and farming, income from partnerships and S Corporations, and distributions from estates and trusts. This definition of gross income is slightly different from the Form 1040, U.S. Individual Income Tax Return, concept of "total income," which is a component of the adjusted gross income (AGI) calculation on the Form 1040. Total income includes net amounts rather than gross amounts (income prior to deductions) from items such as business income and rent and royalties.
[B3]. As defined under Internal Revenue Codè section 62, deductible expenses are those incurred in the course of a trade or business or in connection with rents and royalties; losses from property sales or exchanges; and certain statutory adjustments, such as deductible contributions to an IRA or Keogh plan, or the health insurance deduction for certain self-employed taxpayers.
[B4] Income tax before credits includes tax on lump-sum distributions from qualified retirement plans and tax on accumulation distributions of trusts.
[B5] For taxable income between $\$ 0$ and $\$ 5$ and between $\$ 5$ and $\$ 25$, the tax brackets were $\$ 5$ and $\$ 10$ wide, respectively. For taxable income between $\$ 25$ and $\$ 3,000$, the brackets were $\$ 25$ wide. All brackets for taxable income above $\$ 3,000$ were $\$ 50$ wide.
[B6] For example, assume a taxpayer filing as "married filing separately" reported taxable income of $\$ 94,999$. Using the tax table, the tax would be $\$ 26,843$, but using the tax rate schedules, the tax would be $\$ 26,851.89$, a difference of $\$ 8.89$.

## Appendix C: Other Changes in Law for 1994

Among the additional tax law changes was the expiration of the provision which allowed self-employed persons, or owners of more than two percent of the outstanding stock of an S Corporation, to deduct, in the calculation of AGI, up to 25 percent of the amount paid for health insurance for themselves and their families. On April 11, 1995, this provision was restored retroactively to January 1, 1994; however, to obtain the benefits retroactively, taxpayers had to file amended returns and such returns, if filed, are not reflected in these statistics [C1].
The ceilings on taxable "self-employment income" changed for 1994. The maximum amount of net earnings subject to the social security part of self-employment tax increased to $\$ 60,600$, while all net earnings (without limit) were subject to the Medicare tax portion, provided that -self-employment income was greater than $\$ 433$ ( $\$ 108.28$ for church employees).
Beginning with 1994, written acknowledgment from the qualified recipient organization was required for all charitable contributions of $\$ 250$ or more. Also for 1994, employees could deduct only 50 percent (previously 80 percent) of business meal and entertainment expenses and could no longer deduct club membership dues.
For 1994, the earned income credit could have been as much as $\$ 306$ for taxpayers without children, $\$ 2,038$ for taxpayers with one qualifying child, and $\$ 2,528$ for taxpayers with two or more qualifying children.
Itemized deductions for taxpayers with AGI exceeding $\$ 111,800$ ( $\$ 55,900$ if married filing separately) were subject to a limitation. (The limitation applied to itemized deductions other than deductions for medical and dental expenses, investment interest expenses, casuaity or theft losses, or gambling losses.) Total itemized deductions were reduced by the smaller of 80 percent of the nonexempt deductions, or 3 percent of the amount of AGI in excess of

## Individual Income Tax Rates and Tax Shares, 1994

the threshold amounts. In addition, the itemized deduction limitation and the width of each tax bracket were adjusted for inflation.
The individual personal exemption amount increased from $\$ 2,350$ to $\$ 2,450$. A taxpayer's personal exemption deduction was limited, based on filing status, if AGI exceeded certain amounts. For each filing status, if a taxpayer reported AGI below the bottom threshold, the entire deduction was allowed; if AGI was more than the upper limit, the deduction was disallowed entirely. The deduction was reduced by 2 percentage points for each $\$ 2,500$, or part of $\$ 2,500$ ( $\$ 1,250$ if married filing separately), that AGI exceeded the limitation threshold. The threshold for the limitation of personal exemption amounts increased. For single taxpayers, the limitation began at $\$ 111,800$ and was completed at $\$ 234,300$; for married taxpayers filing jointly and surviving spouses, the limitation began at $\$ 167,700$ and was completed at $\$ 290,200$; for heads of households, the limitation began at $\$ 139,750$ and was completed at $\$ 262,250$; and for married taxpayers filing separately, the limitation began at $\$ 83,850$ and was completed at $\$ 145,100$.
The standard deduction increased from $\$ 3,700$ to $\$ 3,800$ for single filers; from $\$ 6,200$ to $\$ 6,350$ for joint filers and surviving spouses; from $\$ 3,100$ to $\$ 3,175$ for married persons filing separately; and from $\$ 5,450$ to $\$ 5,600$ for heads of households. The additional standard deduction (for taxpayers age 65 or older or the blind) increased from $\$ 900$ to $\$ 950$ for single filers and heads of households, and from $\$ 700$ to $\$ 750$ for married persons filing jointly, surviving spouses, and married persons filing separately.

## Notes to Appendix C

[C1] The reinstated deduction was disallowed for any month in which the self-employed individual was eligible to participate in any subsidized health plan maintained by an employer of the individual or his/ her spouse.

## Appendix D: Income and Tax Concepts

As discussed in Appendix B, gross income is all income received that is not exempt from tax. Total income is the net amount of gross income after certain expenses (i.e., business or rent and royalty expenses) have been deducted. Adjusted gross income (AGI) is the result of total income less statutory adjustments to income (i.e., deductible contributions to an IRA or Keogh plan).

## 1979 Income Concept

To analyze changes in income and taxes over a period of years, a consistent definition of income should be used. Because the components of AGI may vary from year to
year as the tax law changes, the "1979 Income Concept" was developed to provide a more uniform measure of income across tax years. By including the same income and deduction items in each year's income calculation and using only items available on Federal individual income tax returns, the definition of the 1979 Income Concept is consistent throughout the base years and can be used for future years to compare income by including only income components common to all years. Tax Years 1979 through 1986 were used as base years in identifying the income and deduction items included in this concept. The 1979 Income Concept applied to 1994 includes many income and deduction items that are also components of AGI (Figure H). However, unlike AGI, the 1979 Income Concept also includes nontaxable (i.e., tax-exempt) amounts of income reported on individual income tax

## Figure H

## Components of the 1979 Income Concept, Tax Year 1994

## Income or Loss:

Salaries and wages ${ }^{1}$
Interest ${ }^{1}$
Dividends ${ }^{1}$
Taxable refunds ${ }^{1}$
Alimony received ${ }^{1}$
Capital gains reported on Schedule D minus allowable losses ${ }^{1}$
Capital gains and losses not reported on Schedule D ${ }^{1}$
Other gains and losses (Form 4797) '
Business net income or loss '
Farm net income or loss ${ }^{1}$
Rent net income or loss ${ }^{1}$
Royalty net income or loss ${ }^{1}$
Partnership net income or loss ${ }^{1}$
S Corporation net income or loss '
Farm rental net income or loss ${ }^{1}$
Estate or trust net income or loss ${ }^{1}$
Unemployment compensation '
Depreciation in excess of straight-line depreciation ${ }^{2}$
Total pension income ${ }^{3}$
Other net income or loss ${ }^{\text {• }}$
Net operating loss ${ }^{1}$
Deductions:
Disallowed passive losses (Form 8582) ${ }^{3}$
Moving expenses ${ }^{\text {s }}$
Alimony paid ${ }^{1}$
Unreimbursed business expenses ${ }^{\circ}$

[^3]returns, as well as disallowed passive loss deductions. In addition, only straight-line deductions for depreciation are included in the 1979 Income Concept [D1].

## Milodified Taxable income

This concept is relevant only for "prior-year returns." For current-year returns, modified taxable income is identical to taxable income.

This is the term used for the statistics to describe "income subject to tax," the actual base on which tax is computed. Each year, a small number of returns for prior tax years are filed during the same calendar year in which the tax returns for the current tax year are being selected for the Statistics of Income sample. Some of these returns are selected,for the sample and act as proxies for returns for the current tax year that will be filed during a later calendar year. The tax on these returns is based on a previous year's tax law (which may reflect different tax rates and income concepts). For the statistics in this article, the taxable income reported on these prior-year returns is modified to equal an amount necessary to generate the tax actually shown on these returns using current- year rates.

## Marginal Tax Rates

Under the progressive U.S. tax rate structure, different portions of taxable income are taxed at different rates. How income tax is determined for a single taxpayer with AGI of $\$ 275,000$ using the standard deduction is illustrated in Figure I. As shown in the example, five different tax rates are applied to the taxable income to arrive at total tax. The first $\$ 22,750$ of taxable income was taxed at the

## Figure 1

Income Tax Calculation for a Single Taxpayer With One Exemption Who Used the Standard Deduction, Tax Year 1994
[Money amounts are in whole doilars]

| Item | 1994 |
| :---: | :---: |
| Adjusted gross income. | 275,000 |
| Less: Exemption amount. | 0 |
| Standard deduction amount. | 3,800 |
| Equals: Taxable income. | 271,200 |
| Tax based on tax rates for single taxpayers: |  |
| First \$22,750 taxed at 15 percent. | 3,413 |
| Next \$32,350 taxed at 28 percent. | 9,058 |
| Next $\$ 59,900$ taxed at 31 percent | 18,569 |
| Next \$135,000 taxed at 36 percent........................ | 48,600 |
| Next \$21,200 taxed at 39.6 percent....................... | 8,395 |
| Total tax from tax rate schedule................................ | 88,035 |

15 percent rate, the next $\$ 32,350$ was taxed at the 28 percent rate, the next $\$ 59,900$ was taxed at the 31 percent rate, the next $\$ 135,000$ was taxed at the 36 percent rate, and the remaining portion, $\$ 21,200$, was taxed at the 39.6 percent rate. For purposes of this article, the tax rate applied to the last dollar of income (given certain assumptions about which source of income provided the last dollar of income subject to tax) is the marginal tax rate for that return. The example shown has a marginal tax rate of 39.6 percent.

Since the individual income tax structure includes various types of income, deductions, exclusions, credits, and taxes, which are not subject to the same treatment under the tax laws, determining marginal tax rates can be difficult. For instance,investment income of a dependent under age 14 in excess of a specific-amount is treated differently than salaries and wages of the same dependent. The investment income in excess of $\$ 1,200$ was taxed at the marginal tax rate of the parents, while the salaries and wages were taxed at the dependent's own rate.

Calculating marginal tax rates for à specific individual income tax return generally depends on the types and amounts of income reported and the assumptions made about the order in which the income is taxed, in particular, which type of income is assumed to be received "last". This determination is complicated by the presence of items such as the alternative minimum tax and various tax credits.

For this article, it is assumed that the income taxed at the marginal rate was the "last" income received. The alternative minimum tax and income tax credits, such as the earned income credit, are excluded in determining the marginal tax rates. The marginal tax rate is defined as follows:
(1) If a return showed taxable income below or equal to the amount to which the 39.6 percent tax rate was applied, the marginal tax rate of the return was the highest rate at which any amount of taxable income reported on the return was taxed.
(2) If the return had taxable income (from other than net long-term capital gains) below or equal to the maximum amount to which the 28 percent tax rate applied, as well as net long-term capital gains to which the maximum 28 percent rate on the net gain applied, the return was defined as having a " 28 percent (capital gains)" marginal tax rate. However, if the return had taxable income (from other than net long-term capital gains) above the maximum amount to which the 28 percent rate applied, as well as net long-term capital gains to which the 28 percent rate on the net gain

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applied, the return was classified as having the highest rate at which any amount of taxable income reported on the return was taxed.
(3) For returns of dependents with a Form 8615 attached when the use of this form resulted in the taxation of the dependent's income as if it were that of the parents, the return was classified as having a "Form 8615" marginal tax rate (the returns in the Form 8615 classification are not distributed by tax rate).
(4) For returns of parents choosing to report interest and dividend income of their dependents under age 14 on their own (i.e., the parents') return using Form 8814, when the dependent's income generated the only tax liability on the parent's return, the return was classified with a "Form 8814" marginal tax rate.

The classification of returns into marginal tax rate categories for Statistics of Income purposes was essentially a function of filing status, size of taxable income, presence of net long-term capital gains (in excess of net short-term capital losses), and presence of a Form 8615 or a Form 8814. Returns were classified into one of the following eight mutually exclusive marginal tax rate categories: (1) Form 8814 ( 15 percent rate with no tax liability other than that generated by the dependent's income); (2) 15 percent rate; (3) 28 percent rate; (4) 28 percent rate with net long-term capital gains [D2]; (5) 31 percent rate; (6) 36 percent rate; (7) 39.6 percent rate; and (8) Form 8615 (with income taxed at any rate) [D3].

Statistics by marginal tax rate classification and filing status for returns with modified taxable income are presented in Table 1. For each marginal rate classification, modified taxable income and "income tax generated" were computed "at all rates" and "at marginal rate." The "at all rates" computations (columns 3 and 5) show the total amount of modified taxable income or tax generated, tabulated by the marginal tax rate specified; each tax rate classification is mutually exclusive. The "at marginal rate" computations (columns 4 and 6 ) report the specific amounts of modified taxable income taxed and the tax generated at the marginal tax rate shown, for all returns in each of the marginal rate classifications. For example, consider returns in the "joint returns and returns of surviving spouses" filing status that were included in the "39.6 percent" marginal tax rate classification. The total modified taxable income for the 425,973 returns in this classification "at all rates" was $\$ 270.8$ billion (column 3 ) and the total tax generated was $\$ 94.0$ billion (column 5). Nearly $\$ 137.2$ billion (column 4) of the modified taxable income for 1994 was subject to tax at the marginal tax rate of 39.6
percent. This modified taxable income generated $\$ 54.3$ billion (column 6) in tax at the 39.6 percent tax rate with the remainder generated by the lower four tax rates. The alternative minimum tax was not included in the statistics by marginal tax rate.
Statistics on the tax generated, in total and at each marginal tax rate bracket, for returns with modified taxable income are provided in Table 2. Returns in this table are classified by size of AGI rather than by the marginal tax rate classifications used in Table 1. The tax generated at each marginal tax rate was computed based on the modified taxable income for each individual return. For example, the almost 0.9 million returns included in the " $\$ 200,000$ under $\$ 500,000$ " income size classification showed total modified taxable income of $\$ 218.0$ billion and generated total tax of $\$ 65.6$ billion. Of the $\$ 218.0$ billion of modified taxable income, $\$ 32.1$ billion was taxed at 15 percent, $\$ 44.0$ billion was taxed at 28 percent (ordinary income), $\$ 17.5$ billion was taxed at the 28 percent rate with net long-term capital gains, $\$ 40.4$ billion was taxed at 31 percent, $\$ 61.9$ billion was taxed at 36 percent, and $\$ 21.9$ billion was taxed at the 39.6 percent rate, with the remainder consisting of tax related to Forms 8814 and 8615 . Approximately $\$ 4.8$ billion of the total tax generated was from the 15 percent rate, $\$ 12.3$ billion resulted from the 28 percent rate (ordinary income), $\$ 4.9$ billion was from the 28 percent rate with net long-term capital gains, $\$ 12.5$ billion was from the 31 percent rate, $\$ 22.3$ billion was from the 36 percent rate, and $\$ 8.7$ billion resulted from the 39.6 percent rate, with the remainder from tax related to Forms 8814 and 8615.
Statistics are presented in Table 3 on the income and tax generated at each marginal tax rate (as in Table 2, columns 5 through 28) by filing status, instead of size of AGI, for returns with modified taxable income. Over 0.4 million of the 42.2 million returns with modified taxable income filed jointly had some income taxed at the 39.6 percent tax rate. For these returns, the taxable income subject to this rate was $\$ 137.2$ billion and the tax generated was $\$ 54.3$ billion.

## Notes to Appendix D

[D1] For more details on the income computation under the 1979 Income Concept for 1994, see Statistics of Income--Individual Tax Returns 1994--Publication 1304.
[D2] The " 28 percent (capital gains)" marginal tax rate category consists of returns which have a top tax rate of 28 percent, but have net long-term capital gains (in excess of net short-term capital losses) which would have been taxed at a higher rate if it had been some other form of income.

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[D3] For some taxpayers, the statutory marginal tax rate may differ from the actual marginal tax rate. For example, extra income received by certain taxpayers may result in the phaseout of their personal exemptions as well as some of their itemized deductions. Therefore, an extra dollar of income could add more than $\$ 1$ of taxable income. While this taxpayer could face a statutory marginal tax rate of 31 percent, the actual marginal rate faced by the taxpayer would be somewhat higher.

## Appendix E: Computation of Alternative Hilnimum Taxable Income

AMTI was computed by adding certain "tax preferences" (i.e., deduction or exclusion amounts identified as potential sources of tax savings disallowed for AMT purposes) and "adjustments" (i.e., regular tax deduction amounts recomputed or excluded for AMT purposes) to taxable income before any deductions for personal exemptions (Figures J-1 and J-2). Despite the fact that itemized deductions for some taxpayers were limited for regular tax purposes, the full amounts of certain itemized deductions were included as adjustments. To compensate for this, the overall limitation on itemized deductions was subtracted from taxable income for AMT purposes. The "net operating loss deduction" was recomputed to allow for the exclusion of the "tax preference items" and "adjustments" used to

## Figure J-1

| Calculation of Alternative Minimum Taxable |
| :--- |
| Income (AMTI), Tax Year 1994 |$\quad$| Taxable income before deduction for personal |
| :--- |
| exemptions |

PLUS: $\quad$ Adjustments and Preferences
PLUS: $\quad$ Net operating loss deduction
MINUS: $\quad$ Overall itemized deductions limitation
MINUS: Alternative tax net operating loss deduction'
EQUALS: Alternative minimum taxable income
' Limited to 90 percent of AMTI, except when depletion is present on Form 6251. In which case, AMTI is recalculated and the alternative tax net operating loss deduction is limited to 90 percent of the recomputed amount.
reduce regular tax liability. The recomputed net operating loss deduction, termed the "alternative net operating loss deduction," was limited to 90 percent of AMTI (with certain minor exceptions for 1994).

AMTI was reduced by an exemption amount dependent upon the filing status of the individual, subject to phaseout at higher income levels. For 1994, the AMTI exemp-
tion for single filers (and heads of households) was $\$ 33,750$; for joint filers and surviving spouses, $\$ 45,000$; and, for married persons filing separately, $\$ 22,500$. The exemption was reduced (but not below zero) by 25 percent of the amount by which AMTI exceeded threshold levels of $\$ 112,500$ for single filers (and heads of households), $\$ 150,000$ for joint filers, and $\$ 75,000$ for married persons filing separately. The exemption was phased out completely for individuals whose filing status was single (or head of household), married filing jointly, and married filing separately, at $\$ 247,500, \$ 330,000$, and $\$ 165,000$, of AMTI, respectively.

After reduction by the exemption, the first $\$ 175,000$ ( $\$ 87,500$ if married filing separately) of the remaining AMTI was subject to tax at a 26 percent rate, with any excess being taxed at a 28 percent rate. -The resulting tax was reduced by the "alternative minimum tax foreign tax credit," which produced a "tentative minimum tax." Tentative minimum tax was further reduced by the individual's regular tax before credits (including additional taxes from accumulation distributions of trusts or lump-sum distributions from qualified retirement plans) less the foreign tax credit (for regular tax purposes) to yield the alternative minimum tax.

Dependents under the age of 14 with investment income over a certain amount who filed their own return were subject to special rules for AMT purposes. These rules required that the dependents pay the same amount of AMT as their parents would have paid had the parents included the dependent's income on their own tax return. (Dependents filing their own returns were limited to an AMT exemption of $\$ 1,000$ plus their "earned income." The dependent's AMT could be reduced if the parent had regular tax greater than the child's own tentative minimum tax, or if any other dependent under age 14 of the same parents had regular tax greater that this dependent's own tentative minimum tax.)

## Appendix F: Dafa Sources and Limitations

The statistics for Tax Year 1994 are based on a stratified probability sample of unaudited individual income tax returns (Forms 1040, 1040A, 1040EZ, and 1040PC, including electronic returns) filed with the Internal Revenue Service during Calendar Year 1995. Returns in the sample were stratified based on: (1) the larger of positive income or negative income; (2) the size of business and farm receipts; (3) the usefulness of returns for tax modeling purposes; and (4) the presence or absence of the following tax forms: Form 2555, Foreign Earned Income; Form 1116, Foreign Tax Credit (Individual, Fiduciary, or Nonresident Alien Individual); Schedule C,

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## Figure J-2

## Alternative Minimum Tax Adjustments and Preferences, Tax Year 1994

## - Standard deduction

- Medical and dental expenses from Schedule A (the lessor of deductible medical and dental expenses or 2.5 percent of AGI)
- Deductions for state and local income, real estate, and foreign taxes
- Deductions for interest on certain home mortgages not used to buy, build or improve the taxpayer's main home or second home
- Miscellaneous itemized deductions subject to the 2-percent-of-AGI limitation
- Refunds of state and local income, real estate, and foreign taxes previously deducted (negative)
- Investment interest expense (the result could be negative)
- Excess of depreciation on property placed in service after 1986 over less liberal methods allowed for alternative minimum tax (AMT) purposes (straight-line or 150-percent declining balance method, depending on the type of property; the result could be negative)
- Adjustment of gain or loss on property, the basis of which was affected by accelerated depreciation or rapid amortization and which was reduced for AMT purposes (the result could be negative)
- Incentive stock options which were exercised after 1987 (the amount by which the value of the option when exercised exceeded the price paid by the taxpayer; the result could be negative)
- Passive activity loss allowed for regular tax purposes for activities acquired before October 23, 1986, taking into account AMT adjustments and preference items and any AMT prior-year unallowed losses (the result could be negative)
- Difference between income distributions to beneficiaries of estates and trusts for regular tax purposes and the amounts refigured for AMT purposes (the result could be negative)
- Tax-exempt interest from private activity bonds issued after August 7, 1986
- Excess of deduction for carryover of charitable contributions refigured for AMT purposes using AMT, instead of regular tax (the result could be negative)
- Excess of circulation expenditures paid or incurred after 1986 over allowable amortization had the expenditures been capitalized (the result could be negative)
- Excess of percentage depletion deduction for sections 611 and 613 property over the adjusted basis (the result could be negative)
- Excess of accelerated depreciation on property placed in service before 1987 over straight-line depreciation as refigured for AMT purposes
- Adjustment from disallowing the installment sales method of accounting for sales of inventory and stock in trade after March 1, 1986, with certain exceptions (the result could be negative)
- Amount by which excess intangible drilling costs deducted currently over allowable amortization (if these costs had been capitalized) was more than 65 percent of the taxpayer's "net income" from oil, gas and geothermal wells, with exceptions for independent oil producers and royalty owners
- Deferred income from long-term contracts entered into after February 28, 1986, with certain exceptions and limitations (the result could be negative)
- Adjustment for refigured loss from activities in which allowable losses from partnerships or S corporations were limited by "at-risk" and other rules, taking into account AMT adjustments and preference items (the result could be negative)
- Excess of mining exploration and development costs paid or incurred after 1986 over allowable amortization had the costs been capitalized (the result could be negative)
- Âdjustment for taxable distributions received from a cooperative (total AMT patronage dividend and per-unit retain allocation adjustment)
- Excess of rapid amortization of pollution control facilities placed in service after 1986 over otherwise allowable depreciation (the result could be negative)
- Excess of research and experimental expenditures paid or incurred after 1986 over allowable amortization had the expenditures been capitalized (the result could be negative)
- Adjustment for refigured tax shelter farm losses, taking into account AMT adjustments and preference items (the result could be negative)
- Related adjustments, refigured for AMT purposes, including section 179 expense deduction, expenses for business or rental use of the home, conservation expenses, taxable IRA distributions, self-employed health insurance deduction, Keogh retirement plan or selfemployed SEP deduction, and IRA deductions (the result could be negative)


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Profit or Loss from Business (Sole Proprietorship); and Schedule F, Profit or Loss From Farming. Returns were selected at rates ranging from 0.02 percent (for the more numerous, smaller-sized, nearly homogeneous returns) to 100 percent (for the relatively few returns with large income amounts or unusual characteristics). The sampling resulted in 108,861 returns selected to represent the $116,878,243$ returns filed during 1995.

Since the data presented in this article are estimates based on a sample of returns filed, they are subject to sampling error. To properly use the statistical data provided, the
magnitude of the potential sampling error must be known; coefficients of variation (CV's) are used to measure that magnitude. (For information about the samples used for the other tax years referred to in the statistics, for example, in Tables 5 through 8, see the Statistics of Income reports for these years.) Estimated CV's for the number of returns and money amounts for selected income items are presented in Figure K. The reliability of estimates based on samples, and the use of coefficients of variation for evaluating the precision of estimates based on samples, are discussed in the appendix to this issue of the Bulletin.

Figure K
Coefficients of Variation for Selected Items, Tax-Year 1994
[Coetticients of variation are percentages]

| Size of adjusted gross income | Adjustedgross income |  | Taxable income |  | Tax generated |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of returns | Amount | Number of retums | Amount | Number of retums | Amount |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total... | 0.06 | 0.17 | 0.25 | 0.22 | 0.25 | 0.24 |
| Under \$2,000. | . 2.20 | - 1.34 | 4.95 | 6.39 | 4.99 | 6.85 |
| \$2,000 under \$4,000. | 2.44 | 2.49 | 5.47 | 8.18 | 5.56 | 8.38 |
| \$4,000 under \$6,000. | 2.46 | 2.47 | 5.09 | 5.67 | 5.09 | 5.93 |
| - \$6,000 under \$8;000..............:..........................i.............. | $2.42=$ | - $2.42{ }^{-\cdots}$ | 3.53- | $\cdots 4.72$ | 3.54 ${ }^{-}$ | 4.72 |
| \$8,000 under \$10,000.. | 2.38 | 2.39 | 3.31 | 3.71 | 3.31 | 3.73 |
| \$10,000 under \$12,000.. | 2.42 | 2.43 | 3.18 | 3.64 | 3.18 | 3.64 |
| \$12,000 under \$14,000.................................................... | 2.41 | 2.41 | 2.77 | 3.34 | 2.77 | 3.34 |
| \$14,000 under \$16,000... | 2.47 | 2.48 | 2.68 | 3.20 | 2.68 | 3.20 |
| \$16,000 under \$18,000... | 2.64 | 2.64 | 2.79 | 3.26 | 2.79 | 3.26 |
| \$18,000 under \$20,000.. | 0.06 | 0.17 | 0.25 | 0.22 | 0.25 | 0.24 |
| \$20,000 under \$25,000... | 2.20 | 1.34 | 4.95 | 6.39 | 4.99 | 6.85 |
| \$25,000 under \$30,000... | 2.44 | 2.49 | 5.47 | 8.18 | 5.56 | 8.38 |
| \$30,000 under \$40,000...................................................... | 2.46 | 2.47 | 5.09 | 5.67 | 5.09 | 5.93 |
| \$40,000 under \$50,000...................................................... | 2.42 | 2.42 | 3.53 | 4.72 | 3.54 | 4.72 |
| \$50,000 under \$75,000.... | 2.38 | 2.39 | 3.31 | 3.71 | '3.31 | 3.73 |
| \$75,000 under \$100,000.................................................... | 2.42 | 2.43 | 3.18 | 3,64 | 3.18 | 3.64 |
| \$100,000 under \$200,000.................................................. | 2.41 | 2.41 | 2.77 | 3.34 | 2.77 | 3.34 |
| \$200,000 under \$500,000................................................. | 2.47 | 2.48 | 2.68 | 3.20 | 2.68 | 3.20 |
| \$500,000 under \$1,000,000............................................... | 2.64 | 2.64 | 2.79 | 3.26 | 2.79 | 3.26 |
| \$1,000,000 or more.......................................................... | 0.06 | 0.17 | 0.25 | 0.22 | 0.25 | 0.24 . |

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Table 1.--Returns With Modified Taxable Income: Tax Classified by Both the Marginal Rate and Each
Rate at Which Tax Was Computed, Tax Year 1994

| Highest marginal rate at which tax was computed | Number of retums | Adjusted gross income | Modified taxable income |  | Tax generated |  | Income tax after credits |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  | Taxed at all rates | Taxed at marginal rate | At all rates | At marginal rate | Total | As a percentage of- |  |
|  |  |  |  |  |  |  |  | Adjusted gross income | Modified taxable income |
| All returns | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
|  |  |  |  |  |  |  |  |  |  |
| Total......................................... | 92,689,014 | 3,817,221,298 | 2,598,151,782 | 1,423,929,837 | 540,933,400 | 312,761,206 | 532,613,680 | 14.0 | 20.5 |
| 15 percent (Form 8814) ${ }^{\text { }}$.. | 5,708 | -147,605 | 3,642 | 3,642 | 546 | 546 | 423 | $(9)$ | 11.6 |
| 15 percent. | 66,873,608 | 1,579,124,799 | 839,477,558 | 839,455,837 | 125,923,508 | 125,918,376 | 121,400,295 | 7.7 | 14.5 |
| 28 percent... | 21,709,595 | 1,350,488,132 | 1,003,808,285 | 308,713,464 | 190,704,089 | 86,439,770 | 189,726,984 | 14.0 | 18.9 |
| 28 percent (capital gains) ${ }^{2}$. | 324,827 | 64,077,162 | 52,970,947 | 35,217,472 | 13,468,623 | 9,860,892 | 13,370,925 | 20.9 | 25.2 |
| 31 percent...................... | 2,158,066 | 271,168,394 | 217,827,369 | 38,904,771 | 53,134,075 | 12,060,479 | 52,722,356 | 19.4 | 24.2 |
| 36 percent.. | 867,671 | 192,330,745 | 162,135,617 | 35,349,763 | 45,552,675 | 12,725,915 | 45,066,318 | 23.4 | 27.8 |
| 39.6 percent. | 500,734 | 358,541,387 | 320,500,344 | 165,007,607 | 111,713,814 | 65,343,012 | 109,894,380 | 30.7 | 34.3 |
| Form 8615 .. | 248,804 | 1,638,284 | 1,428,018 | 1,277,281 | 436,070 | 412,216 | 431,999 | 26.4 | 30.3 |
| Joint returns and returns of surviving spouses |  |  |  |  |  |  |  |  |  |
| Total.......................................... | 42,228,108 | 2,602,380,553 | 1,800,054,965 | 929,345,698 | 387,413,176 | 214,993,967 | 382,883,065 | 14.7 | 21.3 |
| 15 percent (Form 8814) ${ }^{1}$. | 1,876 | -170,116 | 1,086 | 1,086 | 163 | 163 | 136 | 19 | 12.5 |
| 15 percent. | 26,692,109 | 929,242,217 | 493,502,435 | 493,483,495 | 74,026,053 | 74,022,524 | 72,397,693 | 7.8 | 14.7 |
| 28 percent. | 12,883,030 | 970,980,767 | 709,712,462 | 220,134,540 | 135,074,356 | 61,637,671 | 134,230,802 | 13.8 | 18.9 |
| 28 percent (capital gains) ${ }^{2}$....... | 202,807 | 46,445,365 | 38,380,768 | 25,280,832 | 9,745,107 | 7,078,633 | 9,671,084 | 20.8 | 25.2 |
| 31 percent. | 1,328,542 | 193,812,484 | 153,709,260 | 24,860,811 | 37,220,662 | 7,706,851 | 36,928,159 | 19.1 | 24.0 |
| 36 percent......................... | 693,771 | 159,358,555 | 133,921,552 | 28,430,784 | 37,346,588 | 10,235,082 | 36,975,872 | 23.2 | 27.6 |
| 39.6 percent...................... | 425,973 | 302,711,280 | 270,827,402 | 137,154,149 | 94,000,247 | 54,313,043 | 92,679,318 | 30.6 | 34.2 |
| Form $8615{ }^{3}$.. | -- | -. | --- | -- | -- | -- | -. | (9) | (') |
| Returns of married persons filing separately |  |  |  |  |  |  |  |  |  |
| Total...................................... | 2,189,551 | 73,081,911 | 52,739,548 | 28,175,666 | 11,966,764 | 7,100,766 | 11,753,141 | 16.1 | 22.3 |
| 15 percent (Form 8814) '......... | ** | ** | *** | ${ }^{* *}$ |  | ** | ** | ** | ** |
| 15 percent.............................. | **1,326,667 | **22,464,288 | ${ }^{*} 12,375,845$ | ${ }^{* * 12,375,845}$ | ${ }^{*} 1,856,394$ | **1,856,376 | **1,833,763 | **8.2 | **14.8 |
| 28 percent...... | 718,751 | 27,180,077 | 20,606,235 | 6,949,961 | 3,994,414 | 1,945,989 | 3,987,368 | 14.7 | 19.4 |
| 28 percent (capital gains) ${ }^{2}$....... | 9,456 | 1,703,465 | 1,313,041 | 1,034,544 | 344,326 | 289,672 | 342,433 | 20.1 | 26.1 |
| 31 percent. | 81,279 | 6,004,791 | 4,743,201 | 690,397 | 1,148,054 | 214,023 | 1,140,973 | 19.0 | 24.1 |
| 36 percent.. | 35,028 | 4,502,246 | 3,841,866 | 743,407 | 1,073,978 | 267,627 | 1,057,010 | 23.5 | 27.5 |
| 39.6 percent. | 18,370 | 11,227,044 | 9,859,360 | 6,381,512 | 3,549,598 | 2,527,079 | 3,391,594 | 30.2 | 34.4 |
| Form $8615{ }^{3}$.. | , | , | -- |  | -- | .. | -- | $(9)$ | (9) |
| Returns of heads of households |  |  |  |  |  |  |  |  |  |
| Total........................................ | 9,720,613 | 264,562,692 | 142,251,576 | 104,134,964 | 24,854,084 | 18,169,026 | 22,048,575 | 8.3 | 15.5 |
| 15 percent (Form 8814) '.........- | *3,822 | *27,575 | *2,548 | *2,548 | *382 | * 382 | *287 | 1.0 | 11.3 |
| 15 percent..............................- | 8,682,299 | 192,974,648 | 87,522,821 | 87,520,157 | 13,128,708 | 13,128,024 | 10,459,783 | 5.4 | 12.0 |
| 28 percent.............................. | 955,452 | 54,999,965 | 40,712,120 | 11,567,726 | 7,610,600 | 3,238,963 | 7,564,850 | 13.8 | 18.6 |
| 28 percent (capital gains) ${ }^{2}$....... | 5,757 | 1,155,529 | 971,606 | 730,147 | 249,316 | 204,441 | 247,843 | 21.4 | 25.5 |
| 31 percent.............................. | 46,905 | 5,944,190 | 4,771,542 | 972,000 | 1,179,213 | 301,320 | 1,170,004 | 19.7 | 24.5 |
| 36 percent.............................- | 18,625 | 3,943,980 | 3,291,589 | 769,138 | 936,566 | 276,890 | 901,259 | 22.9 | 27.4 |
| 39.6 percent...........................- | 7,753 | 5,516,805 | 4,979,351 | 2,573,248 | 1,749,299 | 1,019,006 | 1,704,550 | 30.9 | 34.2 |
| Form 8615 *........................... | -- | -- | -- |  | -.- | -. | -. | 19 | (4) |
| Returns of single persons |  |  |  |  |  |  |  |  |  |
| Total........................................ | 38,550,742 | 877,196,142 | 603,105,692 | 362,273,510 | 116,699,376 | 72,497,444 | 115,928,898 | 13.2 | 19.2 |
| 15 percent (Form 8814) ${ }^{1}$......... | ** | ** | ** | ** | * | ** | ** | ** | ** |
| 15 percent.............................. | **30,172,545 | **434,438,581 | *246,076,466 | **246,076,348 | **36,912,354 | **36,911,452 | **36,709,056 | **8.4 | **14.9 |
| 28 percent.............................. | 7,152,362 | 297,327,323 | 232,777,469 | 70,061,237 | 44,024,719 | 19,617,146 | 43,943,964 | 14.8 | 18.9 |
| 28 percent (capital gains) ${ }^{2}$...... | 106,807 | 14,772,803 | 12,305,533 | 8,171,948 | 3,129,874 | 2,288,145 | 3,109,566 | 21.0 | 25.3 |
| 31 percent.............................- | 701,340 | 65,406,929 | 54,603,366 | 12,381,563 | 13,586,146 | 3,838,285 | 13,483,220 | 20.6 | 24.7 |
| 36 percent.............................. | 120,247 | 24,525,964 | 21,080,609 | 5,406,434 | 6,195,542 | 1,946,316 | 6,132,178 | 25.0 | 29.1 |
| 39.6 percent........................... | 48,637 | 39,086,258 | 34,834,232 | 18,898,698 | 12,414,671 | 7,483,884 | 12,118,917 | 31.0 | 34.8 |
| Form $8615^{\text {s }}$.......................... | 248,804 | 1,638,284 | 1,428,018 | 1,277,281 | 436,070 | 412,216 | 431,999 | 26.4 | 30.3 |

*Estimate should be used with caution due to the small number of sample returns on which it is based.
-- Data are combined with data in an adjacent tax rate class to avoid disclosure of intormation tor specitic taxpayers.

- Form 8814 was filed for a dependent child under age 14 for whom the parents made the election to report the child's investment income (if it was from interest or dividends totaling between $\$ 500$ and $\$ 5,000$ ) on the parents' income tax return.
2 Returns with net long-term capital gains in excess ot shor-term capital losses taxed at the 28 percent rate.
${ }^{3}$ Form 8615 was filed for a child under age 14 to report the childs investment income in excess of $\$ 1,200$. The returns in inis rate classitication are not distributed by tax rate.
4 Percentage not computed.
NOTE: Detail. may not add to totals because of rounding.


## Individual Income Tax Rates and Tax Shares, 1994

## Table 2- Retums With Modified Taxable Income: Tax Generated by Rate and by Size of Adjusted Gross Income, Tax Year 1994

[Al figures are estimates based on samples-money amounts are in thousands of dollars]


Footnotes at end of table.

## Individual Income Tax Rates and Tax Shares, 1994

Table 2.-- Returns With Modified Taxable Income: Tax Generated by Rate and by Size of Adjusted Gross Income, Tax Year 1994-Continued
[All tigures are estimates based on samples-money amounts are in thousands of dollars]

*Estimate should be used with caution because of the small number of sample returns on which it is based.
${ }^{1}$ Form 8814 was filed for a dependent child under age 14 for whom the parents made the election to report the child's investrnent income (if it was from interest or dividends totaling between $\$ 500$ and $\$ 5,000$ ) on the parents' income tax return.
${ }^{2}$ Returns with net long-term capital gains in excess of short-term capital losses taxed at the 28 percent rate.
${ }^{3}$ Form 8615 was filed for a child under age 14 to repont the child's investment incorme in excess of $\$ 1,200$. The returns in this rate classification are not distributed by tax rate.
NOTE: Detail may not add to totals because of rounding.

## Individual Income Tax Rates and Tax Shares, 1994

Table 3.- Returns With Modified Taxable Income: Taxable Income and Tax Classified by Each Rate at Which Tax Was Computed and by Filing Status, Tax Year 1994
[All figures are estimates based on samples-money amounts are in thousands of dollars]

| Marginal tax rate dasses | $\begin{gathered} \text { All } \\ \text { returns } \end{gathered}$ |  |  | Joint returns andreturns of surviving spouses |  |  | Retums of mariedpersons filing separately |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Number of retums | Income taxed at rate | Income tax generated at rate | Number of returns | Income taxed at rate | Income tax generated at rate | Number of retums | income taxed at rate | Income tax generated at rate |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| All tax rates... | 92,689,014 | 2,598,151,782 | 540,930,423 | 42,228,108 | 1,800,054,965 | 387,412,120 | 2,189,551 | 52,739,548 | 11,966,726 |
| 15 percent (Form 8814) '...... | 134,416 | 71,086 | 10,671 | 116,522 | 62,353 | 9,362 | 14 | 16 | 2 |
| 15 percent......................... | 92,675,830 | 1,662,789,240 | 249,418,386 | 42,226,232 | 1,083,779,839 | 162,566,976 | 2,189,549 | 28,770,629 | 4,315,594 |
| 28 percent. | 25,482,063 | 483,126,484 | 135,275,415 | 15,488,715 | 357,368,050 | 100,063,054 | 858,182 | 10,675,026 | 2,989,007 |
| 28 percent (capital gains) ${ }^{2} . .$. | 1,551,502 | 89,634,330 | 25,097,612 | 1,123,448 | 67,626,204 | 18,935,337 | 35,770 | 3,182,623 | 891,134 |
| 31 percent......................... | 3,526,472 | 105,509,510 | 32,707,948 | 2,448,286 | 78,776,505 | 24,420,717 | 134,678 | 1,975,966 | 612,549 |
| 36 percent. | 1,368,406 | 90,733,102 | 32,663,917 | 1,119,744 | 75,287,864 | 27,103,631 | 53,398 | 1,753,777 | 631,360 |
| 39.6 percent.. | 500,735 | 165,010,749 | 65,344,256 | 425,973 | 137,154,149 | 54,313,043 | 18,370 | 6,381,512 | 2,527,079 |
| Form $8615{ }^{3}$. | 248,804 | 1,277,281 | 412,216 | - | - | - | -- | -- | - |
|  |  |  |  |  |  |  |  |  |  |
| rate classes |  |  |  | $\qquad$ | Income taxed at rate | Tncome tax <br> generated <br> at rate | Number of returns | Income taxed at rate | Thcome tax <br> generated <br> at rate |
|  |  |  |  | (10) | (11) | (12) | (13) | (14) | (15) |
| All tax rates |  |  |  | 9,720,613 | 142,251,576 | 24,853,801 | 38,550,742 | 603,105,692 | 116,697,775 |
| 15 percent (Form 8814) |  |  |  | 17,629 | 8,586 | 1,287 | 252 | 130 | 20 |
| 15 percent. |  |  |  | 9,716,791 | 119,071,609 | 17,860,741 | 38,543,258 | 431,167,164 | 64,675,075 |
| 28 percent... |  |  |  | 1,031,907 | 15,166,440 | 4,246,603 | 8,103,260 | 99,916,967 | 27,976,751. |
| 28 percent (capital gains) ${ }^{2}$.. |  |  |  | 26,130 | 1,453,533 | 406,989 | 366,153 | 17,371,970 | 4,864,151 |
| 31 percent. |  |  |  | 73,284 | 2,259,266 | 700,373 | 870,225 | 22,497,774 | 6,974,310 |
| 36 percent... |  |  |  | 26,378 | 1,718,894 | 618,802 | 168,885 | 11,972,567 | 4,310,124 |
| -39.6 percent.. |  |  |  | .-. -7,753 | ... 2,573,248 | . 1,019,006 | -48,638 | -18,901,840 | --. $7,485,129$ |
| Form $8615{ }^{\text {3 }}$. |  |  |  | -- | - | . -- | 248,804 | 1,277,281 | 412,216 |

' Form 8814 was filed for a dependent child under age 14 for whom the parents mede an election to report the child"s investment income (if it was from interest or dividends totaling between $\$ 500$ and $\$ 5,000$ ) on the parents' income tax return.
${ }^{2}$ Returns with net long-term capital gains in excess of short-term capital losses taxed at the 28 percent rate.
${ }^{3}$ Form 8615 was filed for a child under age 14 to report the child's investment income in excess of $\$ 1,200$. The returns in this rate classification are not distributed by tax rate.
NOTE: Detail may not add to totals because of rounding.

## Individual Income Tax Rates and Tax Shares, 1994

## Table 4.--Returns With Modified Taxable Income: Tax Classified by Type of Tax Computation and by Size of Adjusted Gross Income, Tax Years 1993 and 1994

| Type of tax computation by size of adjusted gross income | Tax Year 1993 |  |  |  | Tax Year 1994 |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Income tax before credits (regular tax computation) ${ }^{1}$ |  | Tax generated | Difference due to special tax computation ${ }^{2}$ | Income tax before credits (regular tax computation) ' |  | Tax generated | Difference due to special tax computation ${ }^{2}$ |
|  | Number of returns | Amount | Amount |  | Number of returns | Amount | Amount |  |
| (1) (2) (3) (4) $(5)$ $(6)$ (7) (8) |  |  |  |  |  |  |  |  |
| Returns with regular tax computation only |  |  |  |  |  |  |  |  |
| Total.......... | 88,848,467 | 392,858,171 | 392,859,128 | N/A | 90,883,000 | 427,938,878 | 427,937,144 | N/A |
| Under \$5,000. | 3,309,268 | 260,453 | 260,457 | N/A | 3,621,554 | 274,102 | 274,092 | N/A |
| \$5,000 under \$10,000.. | 7,183,440 | 2,343,224 | 2,343,224 | N/A | 7,178,653 | 2,259,315 | 2,259,307 | N/A |
| \$10,000 under \$15,000. | 10,538,406 | 7,426,626 | 7,426,622 | N/A | 10,245,644 | 7,106,764 | 7,106,762 | N/A |
| \$15,000 under \$20,000.. | 10,589,709 | 12,694,206 | 12,694,200 | N/A | 10,570,694 | 12,591,310 | 12,591,304 | N/A |
| \$20,000 under \$25,000.. | 9,308,509 | 17,097,875 | 17,099,139 | N/A | 9,462,383 | 17,070,768 | 17,070,754 | N/A |
| \$25,000 under \$30,000.. | 7,671,656 | 18,792,662 | 18,792,654 | N/A | 8,027,110 | 19,630,451 | 19,630,443 | N/A |
| \$30,000 under \$40,000.. | 12,298,021 | 43,652,729 | 43,652,715 | N/A | 11,939,777 | 42,129,427 | 42,129,400 | N/A |
| \$40,000 under \$50,000. | 9,045,011 | 43,937,300 | 43,937,300 | N/A | 9,006,243 | 43,981,111 | 43,981,106 | N/A |
| \$50,000 under \$75,000. | 12,118,004 | 90,385,890 | 90,385,849 | N/A | 13,003,666 | 96,274,958 | 96,274,952 | N/A |
| \$75,000 under \$100,000.. | 4,103,565 | 52,335,559 | 52,335,560 | N/A | 4,665,057 | 59,838,127 | 59,838,120 | N/A |
| \$100,000 under \$200,000.. | 2,232,809 | 49,985,796 | 49,985,733 | N/A | 2,607,598 | 59,423,477 | 59,423,417 | N/A |
| \$200,000 under \$500,000... | 374,024 | 27,136,278 | 27,136,132 | N/A | 464,797 | 33,971,036 | 33,969,452 | N/A |
| \$500,000 under \$1,000,000. | 55,459 | 11,558,868 | 11,558,845 | N/A | 64,112 | 13,529,591 | 13,529,592 | N/A |
| \$1,000,000 or more... | 20,585 | 15,250,706 | 15,250,698 | NA | 25,711 | 19,858,442 | 19,858,443 | N/A |
| Returns with Form 8615 tax computation |  |  |  |  |  |  |  |  |
| Total........... | 251,531 | 296,709 | 408,132 | 111,423 | 248,804 | 328,743 | 435,378 | 106,635 |
| Under \$5,000... | 205,047 | 52,951 | 81,589 | 28,638 | 200,569 | 47,586 | 72,704 | 25,118 |
| \$5,000 under \$10,000... | 25,209 | 23,989 | 36,826 | 12,837 | 25,027 | 23,636 | 42,009 | 18,373 |
| \$10,000 under \$15,000.. | -8,578 | *14,628 | *28,314 | *13,686 | *8,911 | *14,173 | *27,057 | *12,884 |
| \$15,000 under \$20,000.. | *4.843 | *11,708 | *27,033 | *15,325 | *4,775 | *11,487 | *22,879 | *11,392 |
| \$20,000 under \$25,000... | *1,245 | *3,833 | '7,847 | *4,014 | *4,742 | *15,797 | *32,899 | *17,102 |
| \$25,000 under \$30,000.. | -2,237 | *11,329 | *24,500 | *13,171 | -- | -- | -- | -- |
| \$30,000 under \$40,000.. | - | .- | - | -- | -2,103 | $\bullet 10,498$ | -21,077 | *10,579 |
| \$40,000 under \$50,000.. | *1,124 | *10,089 | *18,584 | *8,495 | .-- | .- | .. | .- |
| \$50,000 under \$75,000.. | - | -- | -- | -- | *917 | *11,165 | *16,080 | -4,915 |
| \$75,000 under \$100,000.. | *962 | *16,290 | *24,530 | *8,240 | *327 | *6,797 | *7,226 | *429 |
| \$100;000 under \$200,000.. | *1,877 | *59,072 | *69,087 | *10,015 | *650 | *27,967 | *37,794 | *9,827 |
| \$200,000 under \$500,000... | *158 | *9,367 | *9,060 | *-307 | *467 | *44,474 | *42,395 | *-2,079 |
| \$500,000 under \$1,000,000.... | *215 | *57,649 | *54,351 | *-3,298 | *236 | *59,112 | *60,101 | *989 |
| \$1,000,000 or more................... | *37 | *25,804 | *26,410 | *606 | 79 | 56,050 | 53,157 | --2,893 |
| Returns with Schedule D tax computation |  |  |  |  |  |  |  |  |
| Total........... | 1,625,559 | 122,253,076 | 115,090,650 | -7,162,426 | 1,551,502 | 120,639,639 | 112,564,953 | -8,074,686 |
| Under $\$ 5,000$. | --- | -- | -- | -- | -. | -- | -- | -- |
| \$5,000 under \$10,000.. | -- | -- | -- | -- | -- | -- | -- | -- |
| \$10,000 under \$15,000... | -- | - | -- | -- | -- | -- | -- | -- |
| \$15,000 under \$20,000.. | .- | - | - | -- | -- | -- | -- | -- |
| \$20,000 under \$25,000.. | -- | - | -- | -- | -- | -- | -- | -- |
| \$25,000 under \$30,000.... | -- | $\cdots$ | - | -- | -- | -- | -- | -- |
| \$30,000 under \$40,000... | -- | -- | -- | -- | - | -- | -- | -- |
| \$40,000 under \$50,000... | - | - | - | -- | -- | -- | -- | - |
| \$50,000 under \$75,000........ | 102,149 | 1,423,425 | 1,412,379 | -11,046 | 99,197 | 1,385,049 | 1,374,785 | -10,264 |
| \$75,000 under \$100,000........ | 112,097 | 1,995,452 | 1,969,890 | -25,562 | 108,596 | 1,928,120 | 1,905,661 | -22,459 |
| \$100,000 under \$200,000., | 869,773 | 25,718,876 | 25,361,873 | -357,003 | 791.118 | 23,811,318 | 23,452,383 | -358,935 |
| \$200,000 under \$500,000.... | 410,837 | 32,349,469 | 31,088,931 | -1,260,538 | 423,886 | 32,889,957 | 31,565,590 | -1,324,367 |
| \$500,000 under \$1,000,000.... | 84,960 | 17,950,865 | 16,812,283 | -1,138,582 | 84,703 | 18,184,218 | 16,934,344 | -1,249,874 |
| \$1,000,000 or more..... | 45,743 | 42,814,989 | 38,445,294 | -4,369,695 | 44,003 | 42,440,979 | 37,332,190 | -5,108,789 |

* Estimate should be used with caution due to the small number of sample returns on which it is based.


## , Includes special taxes not included in tax generated.

${ }^{2}$ The difference between the amount of tax resulting from using provisions of one of the special tax computations and the amount of tax resulting from the regular tax computation. N/A - Not applicable.
NOTE: Detail may not add to totals because of rounding.

## Individual Income Tax Rates and Tax Shares, 1994

Table 5.-Returns With Positive Adjusted Gross Income (AGI): Number of Returns, Shares of AGI and Total Income Tax, AGI Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Descending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 1985-1994
[All figures are estimates based on samples]

| Item, tax year | Total | Descending cumulative percentiles |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Top 1 percent | Top 5 percent | Top 10 percent | Top 25 percent | Top 50 percent |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Number of returns: ' |  |  |  |  |  |  |
| 1985. | 100,625,484 | 1,006,255 | 5,031,274 | 10,062,548 | 25,156,371 | 50,312,742 |
| 1986. | 102,087,623 | 1,020,876 | 5,104,381 | 10,208,762 | 25,521,906 | 51,043,811 |
| 1987. | 106,154,761 | 1,061,548 | 5,307,738 | 10,615,476 | 26,538,690 | 53,077,380 |
| 1988. | 108,872,859 | 1,088,729 | 5,443,643 | 10,887,286 | 27,218,214 | 54,436,429 |
| 1989. | 111,312,721 | 1,113,127 | 5,565,636 | 11,131,272 | 27,828,181 | 55,656,361 |
| 1990. | 112,812,262 | 1,128,123 | 5,640,613 | 11,281,226 | 28,203,066 | 56,406,132 |
| 1991. | 113,804, 104 | 1,138,041 | 5,690,205 | 11,380,410 | 28,451,026 | 56,902,052 |
| 1992. | 112,652,759 | 1,126,528 | 5,632,638 | 11,265,276 | 28,163,190 | 56,326,380 |
| -1993. | 113,681,387 | 1,136,814 | 5,684,069 | 11,368,139 | 28,420,347 | 56,840,694 |
| 1994. | 114,989,920 | 1,149,899 | 5,749,496 | 11,498,992 | 28,747,480 | 57,494,960 |
| Adjusted gross income floor on percentiles (current dollars): |  |  |  |  |  |  |
| 1985. | N/A | 108,134 | 58,883 | 46,322 | 30,928 | 16,688 |
| 1986. | N/A | 118,818 | 62,377 | 48,656 | 32,242 | 17,302 |
| 1987. | N/A | 139,289 | 68,414 | 52,921 | 33,983 | 17,768 |
| 1988. | N/A. | 157,136 | 72,735 | 55,437 | 35,398 | 18,367 |
| 1989. | N/A | 163,869 | 76,933 | -58,263 | 36,839 | 18,993 |
| 1990. | N/A | 167,421 | 79,064 | 60,287 | 38,080 | 19,767 |
| 1991. | N/A | 170,139 | 81,720 | 61,944 | 38,929 | 20,097 |
| 1992. | N/A | 181,904 | 85,103 | 64,457 | 40,378 | 20,803 |
| 1993. | N/A | 185,715 | 87,386 91,226 | 66,077 68,753 | 41,210 42,742 | 21,179 21,802 |
| 1994. | N/A | 195,726 | 91,226 | 68,753 | 42,742 | 21,802 |
| Adjusted gross income floor on percentiles (constant dollars): ${ }^{2}$ | $\cdots$ |  | $\cdots$ | 43,050 | 28743 | 15509 |
| 1985.................................................................... | N/A | 100,496 | 54,724 | 43,050 | 28,743 | 15,509 |
| 1986. | N/A | 108,411 | 56,913 | 44,394 | 29,418 | 15,786 |
| 1987. | N/A | 122,614 | 60,224 | 46,585 | 29,915 | 15,641 |
| 1988. | N/A | 132,828 | 61,484 | 46,861 | 29,922 | 15,526 |
| 1989. | N/A | 132,152 | 62,043 | 46,986 | 29,709 | 15,317 |
| 1990. | N/A | 128,096 | 60,493 | 46,126 | 29,135 | 15,124 |
| 1991. | N/A | 124,919 | 60,000 | 45,480 | 28,582 | 14,756 |
| 1992. | N/A | 129,654 | 60,658 | 45,942 | 28,780 | 14,828 |
| 1993. | N/A | 128,522 | 60,475 | 45,728 46,392 | 28,519 28,841 | 14,657 14,711 |
| 1994. | N/A | 132,069 | 61,556 | 46,392 | 28,841 | 14,711 |
| Adjusted gross Income (milions of dollars): 1 |  |  |  |  |  |  |
| 1985. | 2,343,989 | 235,095 | 531,372 | 791,481 | 1,358,860 |  |
| 1986. | 2,524,124 | 285,197 | 608,467 | 886,510 | $1,490,173$ $1,709,389$ | 2,103,569 |
| 1987. | 2,813,728 | 346,635 | 722,221 | 1,038,221 | 1,709,389 | 2,373,869 |
| 1988. | 3,124,156 | 473,527 | 890,702 | 1,232,536 | 1,950,860 | 2,657,865 |
| 1989. | 3,298,858 | 468,079 | 918,421 | 1,286,539 | 2,054,478 | 2,805,235 |
| 1990. | 3,451,237 | 483,252 | 953,337 | 1,338,032 | 2,144,177 | 2,932,537 |
| 1991. | 3,516,142 | 456,603 | 943,350 | 1,343,202 | 2,174,765 | 2,984,003 |
| 1992. | 3,680,552 | 523,586 | 1,031,093 | 1,443,784 | 2,299,401 | 3,131,400 |
| 1993. | 3,775,578 | 520,586 | 1,048,252 | 1,474,463 | 2,357,953 | 3,212,299 |
| 1994. | 3,961,146 | 546,700 | 1,103,084 | 1,552,205 | 2,481,074 | 3,371,352 |
| Total Income tax (milions of dollars): 3 |  |  |  |  |  |  |
| 1985. | 325,525 | 72,581 | 127,880 | 168,907 | 241,887 | 302,401 |
| 1986.... | 366,979 | 94,491 | 156,240 | 200,703 | 278,976 | 343,289 |
| 1987. | 369,046 | 91,559 | 159,642 | 205,230 | 283,857 | 346,655 |
| 1988. | 412,761 | 113,841 | 188,303 | 236,411 | 321,297 | 389,145 |
| 1989. | 432,838 | 109,259 | 190,188 | 241,458 | 334,258 | 407,599 |
| 1990. | 447,061 | 112,338 | 195,088 | 247,514 | 344,340 | 421,075 |
| 1991. | 448,349 | 111,267 | 194,480 | 250,282 | 346,511 | 423,759 |
| 1992. | 476,163 | 131,156 | 218,479 | 276,213 | 373,700 | 452,070 |
| $\begin{aligned} & \text { 1993.... } \\ & \text { 1994.... } \end{aligned}$ | $\begin{aligned} & 502,720 \\ & 534,754 \end{aligned}$ | $\begin{aligned} & 145,836 \\ & 154,337 \end{aligned}$ | 238,083 254,106 | 297,808 317,902 | 398,516 425,402 | 478,563 <br> 509,256 |

[^4]
## Individual Income Tax Ratẹ and Tax Shares, 1994

Table 5.-Returns With Positive Adjusted Gross Income (AGI): Number of Returns, Shares of AGI and Total Income Tax, AGI Floor on Percentlles in Current and Constant Dollars, and Average Tax Rates, by Selected Descending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 1985-1994-Continued
[All figures are estimates based on samples]

| Item, tax year | Total | Descending cumulative percentilies--Continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{gathered} \text { Top } \\ 1 \text { percent } \end{gathered}$ | $\begin{gathered} \text { Top } \\ 5 \text { percent } \end{gathered}$ | $\begin{gathered} \text { Top } \\ 10 \text { percent } \end{gathered}$ | $\begin{gathered} \text { Top } \\ 25 \text { percent } \end{gathered}$ | $\begin{gathered} \text { Top } \\ 50 \text { percent } \end{gathered}$ |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Average tax rate (percentage): ${ }^{\text {a }}$ |  |  |  |  |  |  |
| 1985. | 13.89 | 30.87 | 24.07 | 21.34 | 17.80 | 15.59 |
| 1986. | 14.54 | 33.13 | 25.68 | 22.64 | 18.72 | 16.32 |
| 1987. | 13.12 | 26.41 | 22.10 | 19.77 | 16.61 | 14.60 |
| 1988......................................................... | 13.21 | 24.04 | 21.14 | 19.18 | 16.47 | 14.64 |
| 1989.......................................................... | 13.12 | 23.34 | 20.71 | 18.77 | 16.27 | 14.53 |
| 1990.......................................................... | 12.95 | 23.25 | 20.46 | 18.50 | 16.06 | 14.36 |
| 1991......................................................... | 1275 | 24.37 | 20.62 | 18.63 | 15.93 | 14.20 |
| 1992............................................. | 12.94 | 25.05 | 21.19 | 19.13 | 16.25 | 14.44 |
| 1993. | 13.32 | 28.01 | 22.71 | 20.20 | 16.90 | 14.90 |
| 1994. | 13.50 | 28.23 | 23.04 | 20.48 | 17.15 | 15.11 |
| Adjusted gross income share (percentage): |  |  |  |  |  |  |
| 1985........................................................... | 100.00 | 10.03 | 22.67 | 33.77 | 57.97 | 82.74 |
| 1986........................................................... | 100.00 | 11.30 | 24.11 | 35.12 | 59.04 | 83.34 |
| 1987........................................................... | 100.00 | 12.32 | 25.67 | 36.90 | 60.75 | 84.37 |
| 1988...................................................................... | 100.00 | 15.16 | 28.51 | 39.45 | 62.44 | 85.07 |
| 1989. | 100.00 | 14.19 | 27.84 | 39.00 | 62.28 | 85.04 |
| 1990. | 100.00 | 14.00 | 27.62 | 38.77 | 62.13 | 84.97 |
| 1991.......................................................... | 100.00 | 12.99 | 26.83 | 38.20 | 61.85 | 84.87 |
| 1992. | 100.00 | 14.23 | 28.01 | 39.23 | 62.47 | 85.08 |
| 1993. | 100.00 | 13.79 | 27.76 | 39.05 | 62.45 | 85.08 |
| 1994. | 100.00 | 13.80 | 27.85 | 39.19 | 62.64 | 85.11 |
| Total income tax share (percentage): |  |  |  |  |  |  |
| 1985............................. | 100.00 | 22.30 | 39.28 | 51.89 | 74.31 | 92.90 |
| 1986...................................................................... | 100.00 | 25.75 | 42.57 | 54.69 | 76.02 | 93.54 |
| 1987............................... | 100.00 | 24.81 | 43.26 | 55.61 | 76.92 | 93.93 |
| 1988........................................................ | 100.00 | 27.58 | 45.62 | 57.28 | 77.84 | 94.28 |
| 1989............................................................... | 100.00 | 25.24 | 43.94 | 55.78 | 77.22 | 94.17 |
| 1990. | 100.00 | 25.13 | 43.64 | 55.36 | 77.02 | 94.19 |
| 1991......................................................... | 100.00 | 24.82 | 43.38 | 55.82 | 77.29 | 94.52 |
| 1992............................................................. | 100.00 | 27.54 | 45.88 | 58.01 | 78.48 | 94.94 |
|  | 100.00 100.00 | 29.01 28.86 | 47.36 47.52 | 59.24 59.45 | 79.27 79.55 | 95.19 95.23 |

[^5]
## Individual Income Tax Rates and Tax Shares, 1994

Table 6.--Returns With Positive Adjusted Gross Income (AGI): Number of Returns, Shares of AGI and Total Income Tax, AGI Floor on Percentiles, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 1985-1994
[All figures are estimates based on samples]

| Item, tax year | Total | Ascending cumulative percentiles |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bottom 50 percent | Bottom 75 percent | Bottom 90 percent | Boftom 95 percent | Bottom 99 percent |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
|  |  |  |  |  |  |  |
| 1985. | 100,625,484 | 50,312,742 | 75,469,113 | 90,562,936 | 95,594,210 | 99,619,229 |
| 1986. | 102,087,623 | 51,043,811 | 76,565,717 | 91,878,861 | 96,983,242 | 101,066,747 |
| 1987. | 106,154,761 | 53,077,380 | 79,616,071 | 95,539,285 | 100,847,023 | 105,093,213 |
| 1988. | 108,872,858 | 54,436,429 | 81,654,643 | 97,985,572 | 103,429,215 | 107,784,129 |
| 1989. | 111,312,721 | 55,656,361 | 83,484,542 | 100,181,451 | 105,747,087 | 110,199,596 |
| 1990. | 112,812,262 | 56,406;132 | 84,609,198 | 101,531,038 | 107,171,651 | 111,684,141 |
| 1991. | 113,804,104 | 56,902,052 | 85,353,078 | 102,423,694 | 108,113,899 | 112,666,063 |
| 1992. | 112,652,759 | 56,326,380 | 84,489,560 | 101,387,483 | 107,020,121 | 111,526,231 |
| 1993. | 113,681,387 | 56,840,693 | - 85,261,040 | 102,313,248 | 107,997,318 | 112,544,573 |
| 1994. | 114,989,920 | 57,494,960 | 86,242,440 | 103,490,928 | 109,240,424 | 113,840,021 |
| Adjusted gross income (millions of dollars): ${ }^{\text {, }}$ |  |  |  |  |  |  |
| 1985. | 2,343,989 | 404,637 | 985,129 | 1,552,508 | 1,812,617 | 2,108,894 |
| 1986. | 2,524,124 | 420,555 | 1,033,951 | 1,637,614 | 1,915,657 | 2,238,927 |
| 1987. | 2,813,728 | 439,859 | 1,104,338 | 1,775,506 | 2,091,507 | 2,467,093 |
| 1988. | 3,124,156 | 466,291 | 1,173,296 | 1,891,620 | 2,233,454 | 2,650,629 |
| 1989. | 3,298,858 | 493,623 | 1,244,380 | 2,012,319 | 2,380,437 | 2,830,779 |
| 1990. | 3,451,237 | 518,700 | 1,307,060 | 2,113,205 | 2,497,900 | 2,967,985 |
| 1991. | 3,516,142 | 532,138 | 1,341,377 | 2,172,939 | 2,572,792 | 3,059,539 |
| 1992. | 3,680,552 | 549,152 | 1,381,151 | 2,236,768 | 2,649,459 | 3,156,966 |
| 1993. | 3,775,578 | 563,279 | 1,417,625 | 2,301,115 | 2,727,326 | 3,254,992 |
| 1994. | 3,961,146 | 589,795 | 1,480,073 | 2,408,941 | 2,858,063 | 3,414,447 |
| Total Income tax (millions of doilars): ${ }^{3}$ |  |  |  |  |  |  |
| - 1985... | 325,525 | 23,124- | - 83,638-- | 156,618 | - 197,645 | 252,944 |
| 1986. | 366,979 | 23,690 | 88,002 | 166,276 | 210,739 | 272,488 |
| 1987. | 369,046 | 22,391 | 85,189 | 163,816 | 209,404 | 277,488 |
| 1988. | 412,761 | 23,616 | 91,464 | 176,350 | 224,459 | 298,920 |
| 1989. | 432,838 | 25,239 | 98,580 | 191,380 | 242,650 | 323,579 |
| 1990............................................................. | 447,061 | 25,986 | 102,721 | 199,547 | 251,973 | 334,723 |
| 1991. | 448,349 | 24,554 | 101,837 | 198,067 | 253,869 | 337,081 |
| 1992. | 476,163 | 24,093 | 102,463 | 199,950 | 257,683 | 345,007 |
| 1993. | 502,720 | 24,157 | 104,203 | 204,912 | 264,637 | 356,884 |
| 1994.. | 534,754 | 25,499 | 109,353 | 216,852 | 280,648 | 380,418 |
| Average tax rate (percentage): 4 |  |  |  |  |  |  |
| 1985. | 13.89 | 5.71 | 8.49 | 10.09 | 10.90 | 11.99 |
| 1986. | 14.54 | 5.63 | 8.51 | 10.15 | 11.00 | 12.17 |
| 1987. | 13.12 | 5.09 | 7.71 | 9.23 | 10.01 | 11.25 |
| 1988. | 13.21 | 5.06 | 7.80 | 9.32 | 10.05 | 11.28 |
| 1989. | 13.12 | 5.11 | 7.92 | 9.51 | 10.19 | 11.43 |
| 1990. | 12.95 | 5.01 | 7.86 | $9.44{ }^{\prime}$ | 10.09 | 11.28 |
| 1991. | 12.75 | 4.61 | 7.59 | 9.12 | 9.87 | 11.04 |
| 1992. | 12.94 | 4.39 | 7.42 | 8.94 | 9.73 | 10.93 |
| 1993. | 13.32 | 4.29 | 7.35 | 8.90 | 9.70 | 10.96 |
| 1994................................................................... | 13.50 | 4.32 | 7.39 | 9.00 | 9.82 | 11.14 |
| Adjusted gross income share (percentage): |  |  |  |  |  |  |
| 1985. | 100.00 | 17.26 | 42.03 | 66.23 | 77.33 | 89.97 |
| 1986. | 100.00 | 16.66 | 40.96 | 64.88 | 75.89 | 88.70 |
| 1987. | 100.00 | 15.63 | 39.25 | 63.10 | 74.33 | 87.68 |
| 1988. | 100.00 | 14.93 | 37.56 | 60.55 | 71.49 | 84.84 |
| 1989................................................................... | 100.00 | 14.96 | 37.72 | 61.00 | 72.16 | 85.81 |
| 1990. | 100.00 | 15.03 | 37.87 | 61.23 | 72.38 | 86.00 |
| 1991. | 100.00 | 15.13 | 38.15 | 61.80 | 73.17 | 87.01 |
| 1992................................................................... | 100.00 | 14.92 | 37.53 | 60.77 | 71.99 | 85.77 |
| 1993......................................................................................................................... | 100.00 100.00 | 14.92 14.89 | $\begin{aligned} & 37.55 \\ & 37.36 \end{aligned}$ | $\begin{aligned} & 60.95 \\ & 60.81 \end{aligned}$ | $\begin{aligned} & 72.24 \\ & 72.15 \end{aligned}$ | $\begin{aligned} & 86.21 \\ & 86.20 \end{aligned}$ |

## Individual Income Tax Rates and Tax Shares, 1994

Table 6.-Returns With Positive Adjusted Gross Income (AGI): Number of Returns, Shares of AGI and Total Income Tax, AGI Floor on Percentiles, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size Using the Definition of AGI for Each Year, Tax Years 1985-1994-Continued
[All figures are estimates based on samples]


N/A-- not applicable.
' The number of returns with negative adjusted gross tncome, i.e., returns with an adjusted gross defidit, and the corresponding amounts for adjusted gross deficit, were exchuded from Tables 5 and 6. By excluding deficit returns, alternative minimum tax reported on some of these returns was also excluded. For Tax Year 1994 there were 3,166 returns with no adjusted gross income that reported atternative minimum tax totaling $\$ 100.3$ million.
${ }^{2}$ Constant dollar estimates were based on the Consumer Price Index (CPI-U 1982-84=100) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, Monthy Labor Review.
s Total income tax is the sum of income tax after credits and atternative minimum tax reported on returns that showed a positive amount for adjusted gross income. Therefore, total income tax excuudes alternative minimum tax reported on some returns with a negative amoumt for adjusted gross income. See also footnote 1.

The average tax rate was computed by dividing total income tax (see footnote 3) by (positive) adjusted gross income.

Table 7.-Returns With Positive Income: Number of Returns, Shares of Income Based on the 1979 Income Concept, and Total Income Tax, Income Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Descending Cumulative Percentiles of Returns Based on Income Size Using the 1979 Income Concept, Tax Years 1985-1994
[All figures are estimates based on samples]

| Item, tax year | Total | Descending cumulative percentiles |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{gathered} \text { Top } \\ 1 \text { percent } \end{gathered}$ | Top 5 percent | $\begin{gathered} \text { Top } \\ 10 \text { percent } \end{gathered}$ | $\begin{gathered} \text { Top } \\ 25 \text { percent } \end{gathered}$ | $\begin{gathered} \text { Top } \\ 50 \text { percent } \end{gathered}$ |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Number of returns: 1 |  |  |  |  |  |  |
| 1985. | 100,215,784 | 1,002,158 | 5,010,789 | 10,021,578 | 25,053,946 | 50,107,892 |
| 1986. | 101,881,062 | 1,018,811 | 5,094,053 | 10,188,106 | 25,470,265 | 50,940,531 |
| 1987. | 106,128,238 | 1,061,282 | 5,306,412 | 10,612,824 | 26,532,059 | 53,064,119 |
| 1988. | 108,831,700 | 1,088,317 | 5,441,585 | 10,883,170 | 27,207,925 | 54,415,850 |
| 1989. | 111,273,993 | 1,112,740 | 5,563,700 | 11,127,399 | 27,818,498 | 55,636,996 |
| 1990. | 112,644,099 | 1,126,441 | 5,632,205 | 11,264,410 | 28,161,025 | 56,322,049 |
| 1991. | 113,755,078 | 1,137,551 | 5,687,754 | 11,375,508 | 28,438,769 | 56,877,539 |
| 1992. | 112,593,838 | 1,125,938 | 5,629,692 | 11,259,384 | 28,148,459 | 56,296,919 |
| 1993-- - - . | 113,721,706 | -1,137,217 | 5,686,085 | --11,372,171 | $-28,430,426$ | $-56,860,853$ |
| 1994.............................................................. | 115,061,112 | 1,150,611 | 5,753,056 | 11,506,111 | 28,765,278 | 57,530,556 |
|  |  |  |  |  |  |  |
| 1985........................................................................... | NA | 125,454 | 63,509 | 49,092 | 31,977 | 17,101 |
| 1986......................................................................... | NA | 147,688 | 68,347 | 52,034 | 33,630 | 17,915 |
| 1987. | NA | 145,646 | 69,216 | 53,092 | 34,166 | 17,960 |
| 1988. | NA | 161,795 | 73,442 | 55,524 | 35,432 | 18,531 |
|  | NA | 169,588 | 77,552 | 58,436 | -36,789 | - - 19,156 |
| 1990. | NA | 174,721 | 80,408 | 60,630 | 38,032 | 19,948 |
| 1991. | NA | 180,316 | 83,317 | 62,421 | 38,916 | 20,304 |
| 1992. | NA | 197,080 | 87,389 | 65,295 | 40,423 | 21,039 |
| 1993. | NA | 199,698 | 88,992 | 66,685 | 41,013 | 21,390 |
| 1994... | NA | 210,742 | 93,186 | 69,118 | 42,480 | 22,000 |
|  |  |  |  |  |  |  |
| 1985.............................................................................. | NA | 116,593 | 59,023 | 45,625 | 29,718 | 15,893 |
| 1986. | NA | 134,752 | 62,360 | 47,476 | 30,684 | 16,346 |
| 1987. | NA | 128,210 | 60,930 | 46,736 | 30,076 | 15,810 |
| 1988. | NA | 136,767 | 62,081 | 46,935 | 29,951 | 15,664 |
| 1989. | NA | 136,765 | 62,542 | 47,126 | 29,669 | 15,448 |
| 1990. | NA | 133,681 | 61,521 | 46,389 | 29,099 | 15,262 |
| 1991. | NA | 132,391 | ${ }^{61,173}$ | 45,830 | 28,573 | 14,907 |
| 1992. | NA | 140,470 | 62,287 | 46,540 | 28,812 | 14,996 |
| 1993. | N/A | 138,199 142,201 | 61,586 62,879 | 46,149 46,638 | 28,383 28,664 | 14,803 14,845 |
| 1994. | N/A | 142,201 | 62,879 | 46,638 | 28,664 | 14,845 |
| treame (millions of dollars): |  |  |  |  |  |  |
| 1985. | 2,502,868 | 301,734 | 628,546 | 905,119 | 1,495,580 | 2,091,694 |
| 1986. | 2,801,375 | 426,237 | 795,034 | 1,095,304 | 1,729,360 | 2,365,312 |
| 1987. | 2,854,624 | 363,729 | 748,879 | 1,066,870 | 1,740,792 | 2,410,410 |
| 1988. | 3,152,156 | 484,475 | 910,840 | 1,254,591 | 1,972,166 | 2,682,269 |
| 1989. | 3,335,581 | 486,816 | 947,005 | 1,317,118 | 2,084,226 | 2,837,477 |
| 1990............................................................. | 3,494,266 | 503,585 | 986,110 | 1,374,485 | 2,179,930 | 2,971,249 |
|  | 3,575,798 | 478,588 | 985,238 | 1,390,402 | 2,224,033 | 3,037,065 |
| 1992. | 3,760,326 | 556,143 | 1,089,411 | 1,508,861 | 2,368,211 | 3,204,199 |
| 1993. | 3,849,532 | 554,075 | 1,105,014 | 1,537,285 | 2,422,475 | 3,278,866 |
| 1994... | 4,033,642 | 579,564 | 1,161,972 | 1,617,250 | 2,544,400 | 3,436,167 |
|  |  |  |  |  |  |  |
| 1985. | 324,299 | 67,217 | 121,525 | 162,495 | 236,042 | 298,149 |
| 1986. | 366,468 | 92,954 | 155,301 | 198,577 | 277,253 | 341,982 |
| 1987. | 368,902 | 89,885 | 158,481 | 204,039 | 282,946 | 346,203 |
| 1988. | 412,540 | 112,191 | 186,803 | 235,147 | 320,142 | 388,632 |
| 1989. | 432,643 | 107,515 | 188,568 | 240,198 | 333,255 | 407,091 |
| 1990. | 446,896 | 110,560 | 192,975 | 245,850 | 342,901 | 420,334 |
| 1991. | 448,176 | 107,908 | 192,511 | 246,715 | 345,154 | 423,175 |
| 1992.......................................................................... | 476,067 | 127,345 | 216,267 | 272,327 | 372,358 | 451,501 |
| 1993. | 502,638 | 142,329 | 235,908 | 294,238 | 397,261 | 477,997 |
| 1994.: | 534,693 | 150,133 | 250,770 | 314,909 - | 423,743 | 508,540 |

## Individual Income Tax Rates and Tax Shares, 1994

Table 7.--Returns With Positive Income: Number of Returns, Shares of Income Based on the 1979 Income Concept, and Total Income Tax, Income Floor on Percentiles in Current and Constant Dollars, and Average Tax Rates, by Selected Descending Cumulative Percentiles of Returns Based on Income Size Using the 1979 Income Concept, Tax Years 1985-1994-Continued
[All figures are estimates based on samples]

| Item, tax year | Total | Descending cumulative percentiles-Continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Top 1 percent | Top 5 percent | $\begin{gathered} \text { Top } \\ 10 \text { percent } \end{gathered}$ | Top 25 percent | Top 50 percent |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Average tax rate (percentage): $4 \times 1$ |  |  |  |  |  |  |
| 1985.................................................................... | 12.96 | 22.28 | 19.33 | 17.95 | 15.78 | 14.25 |
| 1986..................................................................... | 13.08 | 21.81 | 19.53 | 18.13 | 16.03 | 14.46 |
| 1987. | 12.92 | 24.71 | 21.16 | 19.13 | 16.25 | 14.36 |
| 1988.................................................................... | 13.09 | 23.16 | 20.51 | 18.74 | 16.23 | 14.49 |
| 1989..................................................................... | 12.97 | 22.09 | 19.91 | 18.24 | 15.99 | 14.35 |
| 1990... | 12.79 | 21.95 | 19.57 | 17.89 | 15.73 | 14.15 |
| 1991.................................................................. | 12.53 | 22.55 | 19.54 | 17.74 | 15.52 | 13.93 |
| 1992............................................................... | 12.66 | 22.90 | 19.85 | 18.05 | 15.72 | 14.09 |
| 1993.................................................................... | 13.06 | 25.69 | 21.35 | 19.14 | 16.40 | 14.58 |
| 1994.................................................................... | 13.26 | 25.90 | 21.58 | 19.47 | 16.65 | 14.80 |
| Income share (percentage): |  |  |  |  |  |  |
| 1985................................................................... | 100.00 | 12.06 | 25.11 | 36.16 | 59.75 | 83.57 |
| 1986.................................................................. | 100.00 | 15.22 | 28.38 | 39.10 | 61.73 | 84.43 |
| 1987................................................................... | 100.00 | 12.74 | 26.23 | 37.37 | 60.98 | 84.44 |
| 1988.................................................................... | 100.00 | 15.37 | 28.90 | 39.80 | 62.57 | 85.09 |
| 1989. | 100.00 | 14.59 | 28.39 | 39.49 | 62.48 | 85.07 |
| 1990.. | 100.00 | 14.41 | 28.22 | 39.34 | 62.39 | 85.03 |
| 1991.. | 100.00 | 13.38 | 27.55 | 38.88 | 62.20 | 84.93 |
| 1992. | 100.00 | 14.79 | 28.97 | 40.13 | 62.98 | 85.21 |
| 1993.................................................................... | 100.00 | 14.39 | 28.71 | 39.93 | 62.93 | 85.18 |
| 1994.................................................................... | 100.00 | 14.37 | 28.81 | 40.09 | 63.08 | 85.19 |
| Total income tax share (percentage): |  |  |  |  |  |  |
| 1985.................................................................... | 100.00 | 20.73 | 37.47 | 50.11 | 72.79 | 91.94 |
| 1986.................................................................... | 100.00 | 25.36 | 42.38 | 54.19 | 75.66 | 93.32 |
| 1987................................................................... | 100.00 | 24.37 | 42.96 | 55.31 | 76.70 | 93.85 |
| 1988................................................................... | 100.00 | 27.20 | 45.28 | 57.00 | 77.60 | 94.20 |
| 1989................................................................... | 100.00 | 24.85 | 43.59 | 55.52 | 77.03 | 94.09 |
| 1990.................................................................... | 100.00 | 24.74 | 43.18 | 55.01 | 76.73 | 94.06 |
| 1991................................................................... | 100.00 | 24.08 | 42.95 | 55.05 | 77.01 | 94.42 |
| 1992.................................................................... | 100.00 | 26.75 | 45.43 | 57.20 | 78.22 | 94.84 |
| 1993.................................................................... | 100.00 | 28.32 | 46.93 | 58.54 | 79.04 | 95.10 |
| 1994................................................................... | 100.00 | 28.08 | 46.90 | 58.90 | 79.25 | 95.11. |

[^6]
## Individual Income Tax Rates and Tax Shares,

Table 8.-Returns With Positive Income: Number of Returns, Shares of Income Based on the 1979 Income Concept, and Total Income Tax, Income Floor on Percentiles, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size Using the 1979 Income Concept, Tax Years 1985-1994
[All figures are estimates based on samples]

| Item, tax year | Total | Ascending aumulative percentiles |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Bottom 50 percert | Bottorn 75 percent | Bottom <br> 90 percent | Bottom 95 percent | Bottom 99 percert |
| Number of returns: 1 | (1) | (2) | (3) | (4) | (5) | (6) |
|  |  |  |  |  |  |  |
| 1985.................................................................... | 100,215,784 | 50,107,892 | 75,161,838 | 90, 194,206 | 95,204,995 | 99,213,626 |
| 1986........................................................................ | 101,881,062 | 50,940,531 | 76,410,796 | 91,692,956 | 96,787,009 | 100,862,251 |
| 1987. | 106,128,238 | 53,064,119 | 79,596,178 | 9,515,414 | 100,821,826 | 105,066,956 |
| 1988. | 108,831,700 | 54,415,850 | 81,623,775 | 97,948,530. | 103,390,115 | 107,743,383 |
| 1989...................................................................... | 111,273,993 | 55,636,996 | 83,455,495 | 100,146,594 | 105,710,293 | 110,161,253 |
| 1990....................................................................... | 112,644,099 | 56,322,049 | 84,483,074 | 101,379,689 | 107,011,894 | 111,517,658 |
| 1991...................................................................... | 113,755,078 | 56,877,539 | 85,316,308 | 102,379,570 | 108,067,324 | 112,617,527 |
| 1992. | 112,593,838 | 56,296,919 | 84,445,378 | 101,334,454 | 106,964,146 | 111,467,900 |
| 1993..................................................................... | 113,721,706 | 56,860,853 | 85,291,280 | 102,349,535 | 108,035,621 | 112,584,489 |
| - 1994.-.........................-......................................... | 115,061,112 | - 57,530,556 | -. $86,295,834$ | - 103,555,001. | 109,308,056 | 113,910,501 |
| income (millions of dollars): |  |  |  |  |  |  |
| 1985..................................................................... | 2,502,868 | 411,173 | 1,007,288 | 1,597,749 | 1,874,322 | 2,201,134 |
| 1986................................................................ | 2,801,375 | 436,063 | 1,072,015 | 1,706,071 | 2,006,341 | 2,375,138 |
| 1987...................................................................... | 2,854,624 | 444,214 | 1,113,832 | 1,787,754 | 2,105,745 | 2,490,895 |
| 1988. | 3,152,156 | 469,887 | 1,179,990 | 1,897,565 | $2,241,316$ $2,388,576$ | $2,667,681$ 2848,765 |
| 1989... | 3,335,581 | 498,104 | $1,251,355$ $1,314,336$ | $\begin{array}{r}1,0978,463 \\ \hline \quad 2,119,781\end{array}$ | $2,388,576$ $-2,508,156$ | $2,848,765$ $\mathbf{2 , 9 9 0 , 6 8 1}$ |
| 1990....................-.-....................................... | - $3,494,266$ <br> 3575 | - 523,018 | $1,314,336$ $1,351,765$ | $-\quad 2,119,781$ $2,185,396$ | $2,508,156$ $-\quad 2,590,560$ | $-2,990,681$ $3,097,210$ |
| 1991. | 3,575,798 | 538,733 | $1,351,765$ $1,390,115$ | $2,185,396$ $2,251,465$ | $2,590,560$ $2,670,914$ | $3,097,210$ $3,204,183$ |
| 1992. | 3,760,326 | 556,126 570,666 | $1,392,115$ $1,427,057$. | $2,251,465$ $2,312,247$ | $2,670,914$ $2,744,518$ | $3,204,163$ $3,295,456$ |
| 1993. | 3,849,532 | 570,666 597,475 | 1,427,057. |  | 2,871,670 | 3,454,078 |
| 1994........................................................... | 4,033,642 | 597,475. | 1,489,242. | 2,416,392 | 2,871,670 | 3,454,078 |
| Total income tax (milions of dollars): ${ }^{3}$ <br> 1985. |  |  |  |  | 202,773 | 257,082 |
|  | 324,299 | 26,149 | 88,257 $-89,214$ | -161,804 | 202,773 211,167 | -. 277,082 27,513 |
| 1986...................................................................... | 366,468 | 24,486 | 89,214 | 167,891 | 211,167 | 273,513 279 |
| 1987. | 368,902 | 22,699. | 85,956 | 164,863 | 210,421 | 279,017 |
| 1988. | 412,540 | 23,908 | 92,398 | 177,393 | 225,737 | 300,349 |
| 1989. | 432,643 | 25,552 | 99,387 | 192,445 | 244,075 | 325,128 |
| 1990. | 446,896 | 26,561 | 103,994 | 201,046 | 253,921 | 336,336 |
| 1991. | 448,176 | 25,001 | 103,022 | 201,461 | 255,665 | 340,267 |
| 1992. | 476,067 | 24,567 | 103,709 | 203,740 | 259,801 | 348,722 |
| 1993. | 502,638 | 24,641 | 105,377 | 208,400 | 266,730 | 360,309 |
| 1994. | 534,693 | 26,153 | 110,950 | 219,783 | 283,923 | 384,560 |
| Average tax rate (percentage): ${ }^{4}$ |  |  |  |  |  |  |
| 1985. | 12.96 | . 6.36 | 8.76 | 10.13 | 10.82 | 11.68 |
| 1986. | 13.08 | 5.62 | 8.32 | 9.84 | 10.52 | 11.52 |
| 1987...................................................................... | 12.92 | 5.11 | 7.72 | 9.22 | 9.99 | 11.20 |
| 1988. | 13.09 | 5.09 | 7.83 | 9.35 | 10.07 | 11.26 |
| 1989...................................................................... | 12.97 | 5.13 | 7.94 | 9.53 | 10.22 | 11.41 |
| 1990...................................................................... | 1279 | 5.08 | 7.91 | 9.48 | 10.12 | 11.25 |
| 1991...................................................................... | 12.53 | 4.64 | 7.62 | 9.22 | 9.87 | 10.99 |
| 1992. | 1266 | 4.42 | 7.45 | 9.05 | 9.73 | 10.88 |
| 1993..................................................................... | 13.06 | 4.32 | 7.38 | 9.01 | 9.72 | 10.93 |
| 1994..................................................................... | 13.26 | 4.38 | 7.45 | 9.10 | 9.89 | 11.13 |
| Income share (percentage): |  |  |  |  |  |  |
| 1985.................................................................... | 100.00 | 16.43 | 40.25 | 63.84 | 74.89 | 87.94 |
| 1986. | 100.00 | 15.57 | 38.27 | 60.90 | 71.62 | 84.78 |
| 1987...................................................................... | 100.00 | 15.56 | 39.02 | 62.63 | 73.77 | 87.26 |
| 1988...................................................................... | 100.00 | 14.91 | 37.43 | 60.20 | 71.10 | 84.63 |
| 1989...................................................................... | 100.00 | 14.93 | 37.52 | 60.51 | 71.61 | 85.41 |
| 1990..................................................................... | 100.00 | 14.97 | 37.61 | 60.66 | 71.78 | 85.59 |
| 1991..................................................................... | 100.00 | 15.07 | 37.80 | 61.12 | 72.45 | 86.62 |
| 1992. | 100.00 | 14.79 | 37.02 | 59.87 | 71.03 | 85.21 |
| 1993. | 100.00 | 14.82 | 37.07 | 60.07 | 71.29 | 85.61 |
| 1994...................................................................... | 100.00 | 14.81 | 36.98 | 59.91 | 71.19 | 85.03 |

[^7]
## Individual Income Tax Rates and Tax Shares, 1994

Table 8.-Returns With Positive Income: Number of Returns, Shares of Income Based on the 1979 Income Concept, and Total Income Tax, Income Floor on Percentiles, and Average Tax Rates, by Selected Ascending Cumulative Percentiles of Returns Based on Income Size Using the 1979 Income Concept, Tax Years 1985-1994 -Continued
[Al figures are estimates based on samples]

| Hem, tax year | Total | Ascanding cumulative percentiles-Continued |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \text { Bottom } \\ & 50 \text { percent } \end{aligned}$ | $\begin{aligned} & \text { Eottom } \\ & 75 \text { percent } \end{aligned}$ | $\begin{aligned} & \text { Botiom } \\ & 90 \text { percent } \end{aligned}$ | $\begin{aligned} & \text { Botiom } \\ & 95 \text { percent } \end{aligned}$ | Bottom 99 percent |
| Total income tax share (percentage): | (1) | (2) | (3) | (4) | (5) | (6) |
|  |  |  |  |  |  |  |
| 1985.................................................................. | 100.00 | 8.06 | 27.21 | 49.89 | 62.53 | 79.27 |
| 1986................................................................... | 100.00 | 6.68 | 24.34 | 45.81 | 57.62 | 74.64 |
| 1987................................................................... | 100.00 | 6.15 | 23.30 | 44.69 | 57.04 | 75.63 |
| 1988.................................................................... | 100.00 | 5.80 | 22.40 | 43.00 | 54.72 | 72.80 |
| 1989................................................................... | 100.00 | 5.91 | 22.97 | 44.48 | 56.41 | 75.15 |
| 1990................................................................... | 100.00 | 5.94 | 23.27 | 44.99 | 56.82 | 75.26 |
| 1991................................................................ | 100.00 | 5.58 | 2299 | 44.95 | 57.05 | 75.92 |
| 1992...................................................................... | 100.00 | 5.16 | 21.78 | 42.80 | 54.57 | 73.25 |
| 1990...................................................................... | 100.00 | 4.90 | 20.96 | 41.46 | 53.07 | 71.68 |
| 1994. | 100.00 | 4.89 | 20.75 | 41.10 | 53.10 | 71.92 |

[^8]
[^0]:    ${ }^{1}$ Number of taxable returns (column 2) divided by total number of returns (column 1).
    ${ }^{2}$ Average tax rate is totad income tax" (column 5) as a percentage of adjusted gross income (AGI) (column 4).
    ${ }^{3}$ The average adiusted gross income, average total income tax and average tax rate were calculated from unrournded data.
    ${ }^{4}$ Constant dollars are based on the Consumer Price Index (CPI-U, 1982-1984=100) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, Monthly Labor Review.
    ${ }^{5}$ These statistics are based on adjusted gross income (AGI) recomputed to reflect the 1979 Income Concept, thus enabling more valid comparisons to be made of the average tax rates among years. Changes in the definition of AGI among years reñder direct comparison of the unadjusted figures misleading. For additional information, see Statistics of Income-Indinidual Income Tax Returns, for 1985-1994.

[^1]:    ${ }^{1}$ Includes returns with adjusted gross deficit. Tax in these returns represents alternative minimumtax and/or Form 8814 tax not reflected in adjusted gross income or taxable income.
    ${ }^{2}$ Percentage not computed.
    3 Difference not computed.
    NOTE: Detail may not add to totals because of rounding.

[^2]:    ${ }^{1}$ Form 8814 was filed for a dependent child under age 14 for whom the parents mede an election to report the child's investment income (if it was from interest or dividends totaling between $\$ 500$ and $\$ 5,000$ ) on the parents' income tax return. This rate classification is comprised of those returns with a tax liabjity only from the dependents' income and thus the overall total adjusted gross income for these returns is negative.
    ${ }^{2}$ Less than 0.05 percent.
    ${ }^{3}$ Returns with net long-term capital gains in excess of short-term capital losses are taxed at the $\mathbf{2 8}$ percent rate.
    4 Form 8615 was filed for a child under age 14 to report the child's investment income in excess of $\$ 1,200$. The returns in this rate classification are not distributed by tax rate. NOTE: Detail may not add to totals because of rounding.

[^3]:    ' Included in adjusted gross income (AGI) for Tax Year 1994.
    ${ }^{2}$ Adjustment to add back excess depredation (accelerated over straight-line depreclation) deducted in the course of a trade or business and included in net income (loss) amounts shown above.

    3 Includes taxable and tax-exempt pension and relirement distributions, induding
    IRA distributions.
    4Includes an adjustment to add back amounts reported for the "foreign-eamed income exclusion."
    ${ }^{3}$ Not fully induded in AGI for Tax Year 1994.

    - Not included in AGI for Tax Year 1994.

[^4]:    Footnotes at end of Table 6.

[^5]:    Footnotes at end of Table 6.

[^6]:    Footnotes at end of Table 8 .

[^7]:    Footnotes at end of table.

[^8]:    NA-Not applicable.
    1 The number of retums in columns 2 through 6, Tables 7 and 8, were processed in thousands and, therefore, reflect differences due to rounding.
    ${ }^{2}$ Constant dollar estimates were based on the Consumer Price Index (CPFU 1982-84-100) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, Monthly Labor Roview.
    ${ }^{3}$ Total income tax is the sum of income tax after credits and the alternative minimum tax.
    ${ }^{4}$ Average tax rate was computed by dividing total income tax (see footnote 3) by income, using the 1979 income concept (see text and Figure A).
    NOTE: Detail may not add to totals because of rounding.

