## Statistics of Income

SOI BULLETIN

Department of the Treasury Internal Revenue Service

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## Statistics of Income

Department of the Treasury
Internal Revenue Service
Publication 1136 (Rev. 10-82)

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This report contains information on: residential energy credit for 1978-1980; private foundations for 1979; environmental excise taxes reported for 1981-1982; projections of major types of returns to be filed in Fiscal Years 1983-1990; and the crude oil windfall profit tax liability for 1981. In addition, there is an appendix consisting of selected historical data for individuals, corporations, sole proprietorships, and partnerships, as well as data on gross internal revenue collections.

Additional unpublished data concerning these topics are currently available upon request. Further information may be obtained by writing to the Statistics of Income Division, Internal Revenue Service, Washington, DC 20224.

## Suggested CItation

Internal Revenue Service
Statistics of Income Bulletin,
Fall 1982
Washington, D.C. 1982
For sale by the Superintendent of Documents,
U.S. Government Printing Office,

Washington, D.C. 20402

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# COMMISSIONER OF INTERNAL REVENUE 

Washington, DC 20224
October 6, 1982

The Honorable Donald T. Regan
Secretary of the Treasury Washington, DC 20220

Dear Mr. Secretary:
I am transmitting the Fall 1982 issue of the Statistics of Income Bulletin. This report has been produced in accordance with the mandate of section 6108 of the Internal Revenue Code which requires the preparation and publication of statistics reasonably available with respect to the operation of the internal revenue laws. Presented in this issue are recent financial and tax data obtained from tax returns and associated supporting schedules. Also presented are data on projected filings of major types of returns through the end of the decade, reflecting recent tax law changes and economic conditions.

With kind regards,
Sincerely,


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# Residential Energy Credit, 1978-1980 

## By Richard Thompson and Rich Hillelson*


#### Abstract

Data for Tax Year 1980 reveal that of the 93.9 million individual income tax returns filed, 4.7 million claimed the residential energy credit. An overwhelming majority, 4.6 million, claimed the credit as a result of their expenditures on energy conservation items such as insulation and storm windows, while only 155,000 claimed the credit in connection with expenditures for solar, geothermal, or wind energy producing devices. These taxpayers reported spending $\$ 3.2$ billion on the energy conservation items and $\$ 448$ million on the alternative sources of energy and, consequently, were able to reduce their income tax liability by $\$ 562$ million.


## EXPLANATION OF RESIDENTIAL ENERGY CREDIT

In order to reduce energy consumption and to encourage the development and use of alternative energy sources, a residential energy credit was provided for by the Energy Tax Act of 1978. The credit is composed of two separate parts, one based on qualified "energy conservation expenditures," and the other on qualified "renewable energy source expenditures," with different requirements for each type of credit. The entire residential energy credit is available for qualifiled items installed in or on the taxpayer's principal residence from April 20 , 1977, through December 31, 1985. However, the credit could not be claimed for any taxable year beginning before January 1, 1978. Therefore, it was first available for use on 1978 tax returns and covered the 20-month period from April 20, 1977 through December 31, 1978. Also, if the amount of the credit for a given year exceeds the taxpayer's income tax, it can be carried over to subsequent years through 1987.

## Energy Conservation Credit

The credit for energy conservation property is 15 percent of expenditures, including original installation costs, with a maximum expenditure of $\$ 2,000$ and, consequently, a maximum credit of $\$ 300$ per residence over the entire period the credit is to be in effect. The credit is available for each dwelling unit used by the taxpayer as a principal residence; however, the construction of the residence had to be substantially completed before April 20, 1977, in order for the energy conservation expenditures to qualify. In addition, the taxpayer has to be the first person to use the property installed and that property has to be expected to remain in use for at least 3 years. Energy conservation property consists of insulation, storm windows and doors, caulking and weatherstripping, and certain other items such as an automatic energy-saving setback thermostat.

## Renewable Energy Source Credit

The second component of the residential energy credit is the credit for renewable energy source property. This refers to any item which uses a solar, geothermal, or wind source to produce energy. For 1978 and 1979, the credit for renewable energy source property was 30 percent of the first $\$ 2,000$ and 20 percent of the next $\$ 8,000$ of expenditures, including labor costs for on-site preparation, assembly, or original installation. For 1980, the credit was 40 percent of the first $\$ 10,000$ of expenditures. Over the entire period that the credit is to be in effect, the maximum amount of qualifying expenditures is $\$ 10,000$ and the maximum credit varies from a low of $\$ 2,200$ if all qualifying expenditures were made prior to January 1, 1980, to a high of $\$ 4,000$ if all such expenditures were made on or after January 1, 1980. These maximums apply to each principal residence owned by the taxpayer during the time period that the credit is in effect.

In contrast to the credit for energy conservation property, the renewable energy source credit is available for items installed on both existing and newly constructed principal residences. The taxpayer has to be the first person to use the property and it has to be. expected to remain in use for at least 5 years.

## ADDITIONAL 1980 DATA

A closer look at the $\$ 3.2$ billion of conservation expenditures shows that the largest amount, $\$ 1.5$ billion, went for stom windows and doors while $\$ 1.2$ billion was spent on insulation. The third specific item for which a separate total was tabulated was for caulking expenses, which amounted to only $\$ 84$ million. The "other" category of expenditures totaled $\$ 444$ million and was composed of expenses for devices such as automatic setback thermostats and certain furnace replacement burners.

For 1980, the other component of the residential energy credit, the renewable energy source credit, accounted for total expenditures of $\$ 448$ million. Taxpayers spent $\$ 399$ million on the acquisition and installation of solar energy property, while only $\$ 27$ million went for wind energy items, and $\$ 21$ million was used for geothermal energy sources. In terms of number of returns, the utilization of the renewable energy source credit was quite low, with only 137,000 returns reporting expenditures for solar energy, while 11,000 claimed expenses for wind energy and 7,000 showed outlays for geothermal energy. Figure A shows the distribution for both the energy conservation expenditures and the renewable energy source expenditures.

[^0]Figure $A$
Residential energy expenditures - $\mathbf{1 9 8 0}$


## State Data

Figure B shows, by State, for 1980, returns with a residential energy credit as a percent of all returns. While the data for the northeastern States support the expectation that these States would utilize the credit to a greater extent than those in warmer climates, the data for the rest of the country are inconclusive. For example, a higher percentage of taxpayers in Alabama claimed the credit than did those in the surrounding States of. Tennessee, Georgia, Florida, and Mississippi. A possible explanation is that, of these five States, only Alabama has either a State income tax credit or deduction for energy expenditures. This provides the residents of Alabama with an additional incentive to make expenditures related to saving energy.

The following comparison of the States with the highest and lowest rates of energy credit "participation" (percent of returns with a residential energy credit) shows no significant difference in the size of the average credit, with the exception of Hawail, which shows an average credit over six times as large as that of the next highest State, California. This situation is explained by the fact that, for Hawaii, 98 percent of the total residential energy credit is attributable to the renewable energy source category which is based on solar, geothermal, and wind sources. This "renewable" part can amount to as much as $\$ 4,000$ per residence, whereas the energy conservation category (insulation, storm windows, and similar items) is limited to a maximum of $\$ 300$ per residence.

| High. Participation States | Average Credit |
| :---: | :---: |
| Minnesota. | \$82 |
| Massachusetts | \$168 |
| Connecticut | . \$140 |
| Utah | . $\$ 89$ |
| Low Participation States |  |
| California | . . . \$226 |
| Florida | . \$168 |
| Hawaii | . \$1,392 |

## Characteristics of Energy Credit Returns

Table 2 contains a profile of those taxpayers who reported residential energy credit expenditures for 1980. The data below have been derived from that table and offer a comparison between returns filed by taxpayers with such expenditures and all returns filed. Returns with energy expenditures have an average adjusted gross income that is approximately 77 percent higher than the average for all returns. This is not surprising since one would expect a strong correlation between higher incomes, home ownership, and the use of the energy credit. The slightly higher average amounts, on returns with energy expenditures, for total itemized deductions and real estate taxes tend to reinforce this observation. However, this contention seems to be contradicted by the fact that returns with energy expenditures show a lower average home mortgage interest deduction than that claimed for

Figure B
Returns With Residential Energy Credit as a Percent of All Returns, by State, 1980

all returns. This may be explained by the stipulation in the Energy Jax Act of 1978 that only residences substantially completed before April 20, 1977, qualify for the energy conservation part of the credit. As a result, the lower purchase prices and mortgage rates generally associated with these houses would result in a smaller home mortgage interest deduction on the average.

|  | All <br> Returns | Returns with <br> Energy Credit <br> Expenditures |
| :--- | ---: | ---: |
| (average amounts for 1980) |  |  |

## 1978-1980 PERSPECTIVE

The residential energy credit has now been available to taxpayers for 3 years. This brief history provides an opportunity to examine the data for developments and trends. In doing so, it is important to recognize the effect of the maximum expenditure and credit amounts discussed earlier. For both the energy conservation credit and the renewable energy source credit, these maximums apply to each principal residence occupied by the taxpayer. This means that once the taxpayer has claimed the maximum amount allowable for a particular residence, the only way to claim additional amounts is to occupy a new principal residence.

## Energy Credit Trends

In the case of the energy conservation credit, the maximum claimable amount, coupled with the requirement that the residence have been built before April 20, 1977 (which creates a fixed supply of eligible houses) has caused a predictable decline in the number of returns with an energy conservation credit, and a corresponding drop in the amount of the credit claimed over the first. 3 years of the credit. It should also be noted that the data for 1978 include amounts claimed for the 20-month period from April 20, 1977 through December 31, 1978.

## Energy Conservation Credit

|  | Number of Returns (millions) $\qquad$ | Credit Amount (millions) |
| :---: | :---: | :---: |
| 1978. | 5.9 | \$559 |
| 1979 | 4.8 | 437 |
| 1980 | 4.6 | 419 |

While the 3 -year trend for the energy conservation credit has been downward, the opposite is true for the renewable energy source credit shown below. Between 1978 and 1980, the number of retums claiming this part of the residential energy credit has more than doubled, while the amount of the "renewable" credit has increased fivefold. One factor which has encouraged this growth is that all residences are eligible for the "renewable" credit, whereas for the conservation credit, only those constructed before April 20, 1977 qualify. Also, beginning with 1980, the credit amounted to 40 percent of the first $\$ 10,000$ of qualified expenditures whereas for 1978 and 1979 it was 30 percent of the first $\$ 2,000$ of expenditures and only 20 percent of the next $\$ 8,000$ of expenditures. However, it is important to note the extremely small base on which this increase has occurred. The very low number of returns claiming the "renewable" credit, compared to the conservation credit; is probably due to the relatively high cost involved in installing solar, geothermal, and wind equipment.

## Renewable Energy Source Credit

|  | Number of Returns (thousands) | Credit Amount (millions) |
| :---: | :---: | :---: |
| 1978 | 69 | 32 |
| 1979 | 77 | 44 |
| 1980 | 155 | 166 |

With the frequency and amount of the energy conservation credit declining while the relatively smaller renewable energy source credit frequency and amount are increasing, it is of interest to look at the net effect on the total residential energy credit. The combined data below show that the number of returns declined considerably from 1978 to 1979 and then only slightly for 1980. The amount of the residential energy credit fell substantially from 1978 to 1979 and then, for 1980, rebounded to almost the 1978 level due to the effect of the increase in the renewable energy source credit to 40 percent for 1980 (explained above).

|  |  | Residential Energy Credit (before limitation) |  |
| :---: | :---: | :---: | :---: |
|  | Number (mil | Returns <br> ) | Credit Amount (millions) |
| 1978 | . . . | 6.0 | 592 |
| 1979 |  | 4.8 | 481 |
| 1980 | ..... | 4.7 | 584 |

## Energy Expenditure Trends

The above information compares the utilization of the energy conservation credit versus the renewable energy source credit from the perspective of the residential energy credit amount which serves as a direct reduction of the taxpayer's tax liability. It is also informative to make this comparison at the beginning of the process, that is, by examining the actual expenditures made by the taxpayer for energy related goods and services which qualify for the credit. The data below show the 3-year distribution of the amounts spent for the various categories of energy conservation and renewable energy source items.

In the area of energy conservation, the expenditures for insulation showed the largest and most consistent decline over the period while those for storm windows and doors showed a similar decline from 1978 to 1979 and then increased very slightly for 1980. The categories of "caúlking" and " "other" - generally remained constant over the 3 -year period with only slight rises for 1979 before returning to their 1978 levels.

A look at the expenditures for renewable energy sources shows quite a different picture. All three categories (solar, geothermal, and wind) rose dramatically from 1978 to 1980, although it must be pointed out that they started at much lower levels than the various energy conservation items. Expenditures for solar energy more than tripled from $\$ 120.3$ million to $\$ 399$ million. Geothermal expenses increased 7 times from $\$ 3.1$ million to $\$ 21.2$ mililion. The final renewable item, wind energy, increased by a factor of 17, from $\$ 1.6$ million to $\$ 27.4$ million. It remains to be seen whether these increases will continue or if they are only temporary rises in a market limited by very high initial expenditure requirements.

| Category | Energy Expenditures (millions) |  |  |
| :---: | :---: | :---: | :---: |
|  |  | Tax Year |  |
|  | $\underline{1978}$ | $\underline{1979}$ | 1980 |
| Energy Conservation |  |  |  |
| Insulation .......... | 1,760 | 1,332 | 1,218 |
| Storm Windows/Doors | 1,797 | 1,403 | 1,455 |
| Caulking | 89 | 100 | 84 |
| Other .............. | 454 | 467 | 444 |
| Total ... | 4,101 | 3,302 | 3,200 |
| Renewable Sources |  |  |  |
| Solar | 120.3 | 171.2 | 399.0 |
| Geothermal | 3.1 | 9.7 | 21.2 |
| Wind .............. | 1.6 | 9.4 | 27.4 |
| Total | 125.0 | 190.3 | 447.6 |

Table 1.-Returne with Besidentlal Energy Expenditures by Size of Adjusted Grose Income, 1978, 1979, and 1980
[A11 figures are estimates based on samples --money amounts are in thousands of doliars]

(190
[All figures are estinates based on samples--money anounts are in chousinds of dollars]

| Size of adjusted gross income | Energy conservation expenditures--Continued |  |  |  |  |  | Renewable energy source expenditures |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Caulkıng |  |  |  |  |  | : 1978 |  | 1979 |  | 1980 |  |
|  | 1978 |  | 1979 |  | 1980 |  |  |  |  |  |  |  |
|  | Number of returns | ount | Number of returns | Amount | Number of returns | Amount | $\begin{aligned} & \text { Number of } \\ & \text { returns } \end{aligned}$ | Amount | Number of recurns | Amount | Number of returns | Amount |
|  | (22) | (23) | (24) | (25) | (26) | (27) | (28) | (29) | (30) | (31) | (32) | (33) |
| Total. | 1,565,525 | 89,435 | 1.352,636 | 100,365 | 1,225,054 | 83,711 | 69,341 | 125,039 | 76,555 | 190,283 | 155,269 | 447,558 |
| Under \$5,000.. | 15,496 | 593 | 7,304 | 504 | 2,982 | 292 | *147 | *272 | 878 4.823 | 1,742 6.591 6,510 | 1,471 10,693 | 6,558 28,099 |
| \$5,000 under $\$ 10,000 . . . . . . . . . .$. | 106,250 | 4.847 | 57,053 118,966 | 6,262 20.333 20 | 37,011 97,734 | 2,451 13,694 | $* 4,209$ 4,952 | \% 12,557 12,039 | 4.823 8,711 | 6,591 6,610 | 10,693 6,149 | 13,992 |
|  | 116,309 282,693 | 6,225 15,650 18 | 118,966 <br> 22,410 | 20,333 12,008 | 97,734 161,35 | $\begin{array}{r}13,694 \\ 9,424 \\ \hline\end{array}$ | $\stackrel{4,952}{6.325}$ | $\begin{array}{r}12,039 \\ 9,275 \\ \hline\end{array}$ | 8,177 | 13,912 | 14,992 | 39,904 |
| \$20,000 under $\$ 25,000$. | 378,486 | 18,142 | 254,911 | 18,090 | 200,901 | 9,708 | 15,083 | 24,067 | 10,066 | 17.668 | 17,371 | 31.415 |
| \$25,000 under $\$ 30,000$. | 285,268 | 16,671. | 255,736 | 14,047 | 214,154 | ${ }_{14}^{10,971}$ | +9,641 | 8,494 28,010 |  | 43,901 43,196 | 25.031 <br> 31.758 | -103,764 |
| \$ $\$ 30.000$ under $\$ 40.000 . \ldots \ldots \ldots . .$. | $\begin{array}{r}253,847 \\ \hline 9.333\end{array}$ | 14,709 6,372 | $\begin{array}{r}275,148 \\ 94 \\ \hline 8,380\end{array}$ | $\begin{array}{r}15,185 \\ 5,870 \\ \hline\end{array}$ | 286,057 132,358 | 14,405 <br> $.9,756$ | $\begin{array}{r}16,378 \\ 6,457 \\ \hline\end{array}$ | 28,010 18,622 | $\begin{array}{r}16,12 \\ 5,675 \\ \hline\end{array}$ | ${ }_{15,632}$ | 20,252 | ${ }_{\text {S0,887 }}$ |
| \$40,000 under $\$ 50,000 \ldots \ldots . . . . .$. | 79,333 |  | 94,380 |  |  | - $\begin{array}{r}\text { 9,756 } \\ \hline\end{array}$ |  |  |  | 23,550 |  |  |
| \$50,000 under \$75,000... | 37,797 | 4,258 | 50,911: | 4,385 1,975 | 70,069 14,798 | 7,698 2,403 | 1, 1,742 | ${ }_{9}^{6,842}$ | 2,286 | 6,900 | 5,758 | 29.200 |
| \$25,000 under $\$ 100,000 \ldots \ldots . . . . .$. | 5,844 3,649 | $\begin{array}{r}639 \\ 1,086 \\ \hline\end{array}$ | 9,9,956 | 1,975 <br> 1,350 | $\begin{array}{r}14,798 \\ 6,387 \\ \hline\end{array}$ | 2,422 2,120 | $\stackrel{1}{1,275}$ | 4,854 | 1,962 | ${ }^{6} 8.681$ | 4.254 | 19,095 |
| \$200,000 or more.................. | 553 | ${ }_{243}$ | 791 | 354 | 1.268 | 788 | ! 268 | 1,422 | 380 | 1,901 | 1,215 |  |
| Size of adjusted gross income |  |  | Residential energy credit carryover |  |  |  | Total residential energy credit (before 11mitation) |  |  |  |  |  |
|  |  |  | From 1978 (shown on |  | From 1979 (shown on 1980 returns) |  | - 1978 |  | 1979 |  | 1980 |  |
|  |  |  | Number of returns | Amount | Number of returns | Amount | $\begin{aligned} & \text { Number of } \\ & \text { returns } \end{aligned}$ | Amount | $\begin{aligned} & \text { Number of } \\ & \text { returns } \end{aligned}$ | Amount | Number of returns | Amount |
|  |  |  | (34) | (35) | (36) | (37) | (38) | (39) | (40) | (41) | (42) | (43) |
| Total........ |  |  | 105,303 | 18,369 | 118,244 | 20,192 | 5,960,618 | 591,509 | 4,911,119 | 498,967 | 4,781,708 | 604,624 |
| Under \$5,000.. |  |  | $\begin{array}{r} 8,682 \\ 21,889 \\ 20,639 \\ 12,442 \end{array}$ | 1,6042,4863,0342,1562,156 | 11,47233,94615,70315,06716,47 | 1,519 <br> 3,906 <br> 2,558 | $\begin{aligned} & 56,955 \\ & 441,635 \\ & 647,208 \end{aligned}$ | $\begin{array}{r}5,553 \\ 388.45 \\ 61,396 \\ \hline 186\end{array}$ | $\begin{array}{r}62,778 \\ \hline 313,986 \\ 542,141 \\ \hline\end{array}$ | 7.07633.57550.360 | $\begin{gathered} 55,845 \\ 290,414 \\ 290,217 \\ 440,21 \end{gathered}$ | 8,88635.94245,869 |
| \$5,000 under $\$ 10,000$. |  |  |  |  |  |  |  |  |  |  |  |  |
| \$10,000 under $\$ 15,000 .$. |  |  |  |  |  | 3,685 |  | 99,627 | 761,780 | 73,591 | 601,151 | 68,850 |
| \$20,000 under $\$ 25,000$. |  |  | 14,913 | 3,474 <br> 1,853 <br> 2,492 | $\begin{aligned} & 14,431 \\ & 9,332 \\ & 12,212 \\ & 2,296 \end{aligned}$ | $\begin{aligned} & 2,680 \\ & 1,457 \\ & 2,245 \\ & 1,192 \end{aligned}$ | $1,288,343$88,006921,292299,412 | $\begin{array}{r} 126,796 \\ 82,851 \\ 98,409 \\ 36,254 \end{array}$ | $\begin{aligned} & 857,505 \\ & 790,869 \\ & 931,451 \\ & \hline 315,940 \end{aligned}$ | $\begin{aligned} & 78,163 \\ & 77,549 \\ & 97.445 \\ & 34,958 \end{aligned}$ | $\begin{array}{r} 749,438 \\ 720,844 \\ 1,020,722 \\ 465,048 \end{array}$ | $\begin{array}{r} 78,987 \\ 85,776 \\ 128,848 \\ 64,159 \end{array}$ |
| \$25,000 under $\$ 30,000 \%$ |  |  | 11,892 |  |  |  |  |  |  |  |  |  |
| \$30,000 under $\$ 40,000$. |  |  | 9,501 1,770 | 2,492 415 |  |  |  |  |  |  |  |  |
| \$50,000 under $\$ 75,000$. |  |  | $\begin{array}{r} 2,058 \\ 950 \\ 497 \\ .70 \end{array}$ | $\begin{gathered} 415 \\ 498 \\ 172 \\ 169 \\ 17 \end{gathered}$ | $\begin{array}{r} 2,338 \\ \$ 303 \\ 754 \\ 189 \\ 189 \end{array}$ | $\begin{aligned} & 657 \\ & * 83 \\ & 149 \\ & 62 \end{aligned}$ | $\begin{gathered} 194,435 \\ 51,998 \\ 39,724 \\ 7,503 \\ \hline \end{gathered}$ | $\begin{gathered} 24,765 \\ 9,046 \\ 6,816 \\ 1,533 \\ 1,536 \end{gathered}$ | $\begin{array}{r} 220,502 \\ 58,242 \\ 46.626 \\ 9,359 \\ 9,35 \end{array}$ | $\begin{gathered} 28,569 \\ 8,301 \\ 77878 \\ 1,801 . \end{gathered}$ | $\begin{aligned} & 295,654 \\ & 76,435 \\ & 54,386 \\ & 11,554 \end{aligned}$ | 49.86718.31213.2823.846 |
| \$75,000 under \$100,000. |  |  |  |  |  |  |  |  |  |  |  |  |
| \$100,000 under \$200,000. |  |  |  |  |  |  |  |  |  |  |  |  |
| \$200,000 or more...... | . . . | ........ |  |  |  |  |  |  |  |  |  |  |

[^1]Table 2.--Selected Income, Deductions, and Tax Items on Returns With Residential Energy Expenditures, 1980
[All figures are estimates based on samples-money amounts are in thousands of dollars]


## DATA SOURCES AND LIMITATIONS

These statistics are based on a sample of individual income tax returns, Forms 1040, for each of the Tax Years 1978, 1979, and 1980. Returns in each year's sample were stratified based on the presence or absence of Schedule C, Profit (or Loss) from Business or Profession; State in which filed; adjusted gross income or deficit, or largest selected source of income or loss; and size of business plus farm receipts. The 1978 returns were selected at rates that ranged from .02 percent to 100 percent and the 1979 and 1980 returns from 0.05 percent to 100 percent. For 1980, there were 171,508 returns in the sample, from a total population of $93,902,469$ returns. For 1979, the sample size was 203,536 returns and the population was $92,694,302$ returns. For 1978, there were 157,518 returns in the sample and 89,771,551 in the population.

## Coefficient of Variation

As the data presented in this article are estimates based. upon a sample of documents filed with the Internal Revenue Service, they are subject to sampling, as well as nonsampling, errors. To properly use the statistical data provided, the magnitude of the sampling errors must be known.

The table below presents approximated coefficients of variation (CV's) for frequency estimates. The approximate CV's shown here are intended only as a general indication of the reliability of the data. For numbers of returns other than those shown below, the corresponding CV's can be estimated by interpolation.

The reliability of estimates based on samples, and the use of coefficients of variation for evaluating the precision of sample estimates are discussed in Appendix II.

| 1980 |
| :---: |
| Number of Returns | | Approximated <br> Coefficient of Variation |
| :---: |
| $5,049,200$ |
| 807,900 |
| 202,000 |
| 50,500 |
| 22,400 |
| 8,100 |

# An Examination of Private Foundations for 1979 

By Thomas B. Petska*

In 1979 there were approximately 28,000 foundations that spent $\$ 3.2$ billion for charitable, religious, and other philanthropic purposes. Over $\$ 1.7$ billion of these expenditures were made by the 490 largest foundations. Of the $\$ 6.0$ billion in income received by foundations in 1979, these 490 largest foundations accounted for $\$ 3.6$ billion of this amount.

Total assets of foundations were similarly concentrated. Those with assets of $\$ 1,000,000$ or more accounted for only 13 percent of all foundations but 90 percent of total foundation assets. The 490 largest foundations accounted for 65 percent of total foundation assets. The largest foundation, the Ford Foundation, had assets of $\$ 2.4$ billion, which was 7 percent of the total.

| Asset Size |  | Percent of Total | Total Assets (Billions) | Percent of Total |
| :---: | :---: | :---: | :---: | :---: |
| Total. | 27,980 | 100.0\% | \$34.7 | 100.0\% |
| Under \$100,000. . | 15,747 | 56.3 | 0.4 | 1.1 |
| \$100,000 under |  |  |  |  |
| \$1,000,000.... | 8,717 | 31.2 | 3.0 | 8.6 |
| \$1,000,000 under |  |  |  |  |
| \$10,000,000... | 3,026 | 10.8 | 8.8 | 25.4 |
| \$10,000,000 |  |  |  |  |
| or more. | 490 | 1.7 | 22.5 | 64.8 |

Although the Ford Foundation was clearly the largest foundation, several other foundations also reported assets in excess of $\$ 250$ million. The ten largest foundations, which are listed below in order of decreasing asset size, had assets that totaled $\$ 6.5$ billion, or 19 percent of the total.

| Ranking | Name | Total Assets <br> (Millions) |
| :---: | :--- | :---: |
| 1 | Ford Foundation | $\$ 2,437$ |
| 2 | Andrew W. Mellon Foundation | 691 |
| 3 | Kresge Foundation | 609 |
| 4 | Rockefeller Foundation | 539 |
| 5 | Robert Wood Johnson Foundation | 508 |
| 6 | Charles Stewart Mott Foundation | 405 |
| 7 | The MacArthur Foundation | 397 |
| 8 | W.M. Keck Foundation | 336 |
| 9 | Fundacao Calouste Gulbenkian | 321 |
| 10 | The Pew Memorial Foundation | 287 |

The number of foundations and their assets, total receipts, and expenditures for exempt purposes all increased substantially in the 1962-1979 period. The number of foundations nearly doubled while assets, receipts, and expenditures for exempt purposes tripled.
(Expenditures for exempt purposes represent expenditures for activities that were directly related to the tax-exempt purpose of the foundation and included expenditures made for charitable, educational, religious, scientific or other similar purposes.)

| Income Year |  | $\begin{gathered} \text { Total } \\ \text { Assets } \\ \text { (Billions) } \\ \hline \end{gathered}$ | $\begin{aligned} & \text { Total } \\ & \text { Receipts } \\ & \text { (Billions) } \end{aligned}$ | Expenditures for Exempt Purposes (Billions) |
| :---: | :---: | :---: | :---: | :---: |
| 1962 | . 14,865 | \$11.6 | \$1.9 | \$1.0 |
| 1974 . | . 26,889 | 25.5 | 2.8 | 2.4 |
| 1979 . | .. 27,980 | 34.7 | 6.0 | 3.2 |

## PRIVATE AND PUBLIC PHILANTHROPY

As can be seen in the table below, the number of private foundations and their philanthropic expenditures are small in comparison to those of other organizations recognized as tax-exempt under Internal Revenue Code subsection 501(c)(3). Other 501(c)(3) organizations, such as the American Cancer Society and the National Kidney Foundation, are generally considered "public charities" because these organizations have a broad base of public financial support. Private foundations have a narrow base of financial support, receiving most of their funds from their founder(s). In addition to this broad base of support, "public charities" are in the advantageous position of having fewer requirements and are exempt from paying the excise tax that is required of foundations. (A discussion of the requirements affecting foundations appears in the next section.)

| Income Year 1975 | Number of Organizations | Expenditures for Exempt Purposes (Billions) |
| :---: | :---: | :---: |
| Total exempt under subsection 501(c)(3). | 109,135 | \$39.4 |
| Private foundations All other .......... | $\begin{aligned} & 27,087 \\ & 82,048 \end{aligned}$ | $\begin{array}{r} 2.6 \\ 36.8 \end{array}$ |

Data are presented in the table below for three years in the 1962-1979 period to show the relative magnitude of private foundation expenditures. A measure of public philanthropy called "Government Social Welfare Expenditures" is included for comparative purposes. This series is compiled by the Social Security. Administration [10] and includes direct Government disbursements to the aged, disabled, unemployed, and poor, plus Government expenditures for schools, hospitals, and other similar facilities.

Expenditures for exempt purposes by private foundations are small in comparison to Government Social Welfare Expenditures and the Gross National Product (GNP). Public philanthropy, as measured by- Government Social Welfare Expenditures, accounted for between 11 and 18 percent of the GNP for the three years shown. Private foundation expenditures represented less than 1 percent of Government Social Welfare Expenditures and are negligible in comparison to the GNP.

While the expenditures of private foundations are small relative to the total of all tax-exempt organizations, they still account for billions of dollars. Furthermore, private philanthropic organizations have considerable flexibility in carrying out their activities. Since they are not directly accountable to the public, these organizations can initiate creative approaches to social problem-solving without a need for an immediate return on their investments as is often the case for public social programs. In addition, private philanthropy can shift resources and priorities without the burdens that are characteristic of public programs.

| Income Year | Expenditures for Exempt Purposes (Billions) | ```Government Social Welfare Expenditures (Billions)``` | Gross National Product (Billions) |
| :---: | :---: | :---: | :---: |
| 1962. | \$1.0 | \$64.7 | \$565.0 |
| 1974. | $=-2.4$ | - 264.7 | 1,434.2- |
| 1979.. | 3.2 | 440.3 | 2,417.8 |

## TAX TREATMENT OF PHILANTHROPIC ACTIVITIES

The Federal Government grants exemption from income taxation to certain organizations that engage in charitable and other philanthropic activities in order to encourage philanthropy. in the private sector. The primary reason for tax-exempt status was best described in a U.S. House of Representatives Ways and Means Committee report on the Revenue Act of 1938 [17]:

> "The exemption from taxation of money or property devoted to charitable or other (exempt) purposes is based upon the theory that the government is compensated for the loss of revenue by its relief from the financial burden which would otherwise have to be made by appropriations from public funds, and by the benefits resulting from the promotion of the general welfare."

Another tax benefit that indirectly assists:organizations engaged in philanthropic activities is the deductibility by donors of contributions from their income. By reducing taxable income, contributors reduce their total tax liability. This effectively lowers the net cost of a contribution by the amount of the contribution times the marginal tax rate of the taxpayer.

Before 1969, private foundations were not defined in the Internal Revenue Code but were generally recognized as tax-exempt under Code subsection 501(c)(3), along with charitable, educational, religious, and other. "philanthropic" type organizations. Increasing public awareness of the privileges of tax-exempt status and alleged foundation involvement in questionable activities contributed to the passage of the Tax Reform Act of 1969. Under this Act, a private foundation was defined as a nongovernment, nomprofit organization with a narrow base of financial support whose goal was to assist social, educational, religious or other activities deemed to serve the public good.

Foundations are classified as either "nonoperating" or "operating." Nonoperating foundations, which account for approximately 96 percent of the total, are organizations that carry out charitable or other philanthropic activities in an indirect manner by making grants to other organizations or persons that carry out these activities. Operating foundations, on the other hand, engage directly in charitable and other philanthropic activities. In the case of individuals, contributions to private nonoperating foundations are deductible up to a limit. of 20 percent of adjusted gross income (AGI), while contributions to operating foundations and public charities are deductible up to a limit of 50 percent of AGI. Contributions by corporations to philanthropy (including amounts donated to private foundations) are deductible only up to 5 percent of net income.

In addition to defining private foundations, the 1969 Act significantly increased the number of restrictions on foundation activities, imposed an excise tax on a foundation's net investment income to cover the Government's cost of monitoring their activities, and required nonoperating foundations to make a current minimum distribution for charitable or other philanthropic purposes. This required minimum distribution was established to insure that foundations that benefited from their tax-exempt status were also currently involved in charitable or other philanthropic activities. This provision has been criticized on the grounds that it would necessitate the liquidation of assets which could eventually lead to the extinction of private foundations over time.

As can be seen above, foundation spending for philanthropy was about the same relative to assets in 1979 as it was in 1974. The overall number of foundations increased between. 1974 to 1979; and the number of foundations with assets of $\$ 10$ million or more increased from 354 to 490 . Therefore, these data do not support the position that foundations are a dying breed.

COMPARISON OF FOUNDATION FINANCIAL DATA, 1974 AND 1979

All of the foundation asset items, except for accounts and notes receivable, increased considerably between 1974 and 1979. Corporate stock, the largest asset item, increased by $\$ 2.3$ billion, while. corporate bonds, the second largest, increased by $\$ 2.0$ billion. Government obligations were the third largest asset item, and witnessed the largest increase both in actual amounts and on a percentage basis. This increase was $\$ 2.7$ billion, which is almost twice the 1974 amount. The large percentage increase in Government obligations was probably due to the high levels: of interest rates in 1979, making Government obligations more attractive relative to other investments.

| Asset Item | $\begin{gathered} 1974 \\ \text { (Billions) } \\ \hline \end{gathered}$ | $\begin{gathered} 1979 \\ \text { (Billions) } \end{gathered}$ | Change from 1974 |
| :---: | :---: | :---: | :---: |
| Total. | \$25.5 | \$34.7 | 36\% |
| Corporate stock. | 13.4 | 15.7 | 17 |
| Corporate bonds...... | 5.0 | 7.0 | 40 |
| Government obligations | S 1.4 | 4.2 | 200 |
| Cash.................. | 1.2 | 2.0 | 66 |
| Accounts and notes receivable (net)... | 1.0 | 0.8 | -20 |
| Other................ | 3.5 | 5.0 | 42 |

On a percentage basis, the relatively small increase in corporate stock in comparison to other type assets produced an overall 8 percent decline in corporate stockholdings as a percent of total assets (from 53 to 45 percent). Corporate bonds accounted for 20 percent of total assets in both years. Government obligations accounted for the largest relative increase, growing from 6 to 12 percent of the total. The other asset composition shares were relatively stable between the two periods.

If the effects of inflation are removed from the asset data for these two years, the picture that emerges is somewhat different. The level of prices, as measured by the Implicit Price Index for the Gross National Product [14, 15], increased by 42 percent between these two periods. Since the value of total assets only increased by 36 percent, "real" asset values actually declined. With a base period of 1972 $=100$, the total real asset values were $\$ 22.2$ billion for 1974 and $\$ 21.2$ billion for 1979 .

Total liabilities for all foundations decreased by 8 percent between 1974 and 1979. For foundations with $\$ 10$ million or more in assets, it decreased by 17 percent. However, for foundations with assets under $\$ 1$ million, total liabilities increased by 25 percent. For all foundations total liabilities for 1979 were only 4 percent of total assets.

In both years, contributions, gifts, and grants constituted the largest source of receipts, while dividends and interest were the two next largest sources. Although dividends ranked second for 1974, it dropped to third for 1979 with interest replacing it. This increase in the share of interest relative to dividends is not surprising when two factors are considered. First, as the asset composition indicates, investment portfolios have shifted away from holdings of corporate stock toward Government obligations. Second, and related to the first reason, in 1979. interest rates were at historically high levels so, even without portfolio changes, returns on these assets would be high relative to 1974.

| Receipts | $\begin{gathered} 1974 \\ \text { (Billions) } \\ \hline \end{gathered}$ | $\begin{gathered} 1979 \\ \text { (Billions) } \\ \hline \end{gathered}$ | $\begin{aligned} & \text { Change } \\ & \text { from } 1974 \end{aligned}$ |
| :---: | :---: | :---: | :---: |
| Total Receipts.. | \$2.8 | \$6.0 | 114\% |
| Contributions, gifts, grants..... | 1.2 | 2.3 | 91 |
| Dividends....... | 0.7 | 1.2 | 71 |
| Interest. | 0.7 | 1.2 | 71 |
| Net gain (or loss) from sales of asset | -0.2 | 0.8 | 500 |
| Other................ | 0.3 | 0.6 | 100 |

Contributions, gifts, and grants is by far the largest component of total deductions, and it increased its share of the total from 71 to 79 percent between 1974 and 1979. The next largest deduction item, employee wages and benefits, increased from 5 to 6 percent of total deductions.

FOLNDATION ASSETS, INCOME AND DISTRIBUTIONS, BY SIZE OF TOTAL ASSETS, 1979

In Figure $A$, the three largest components of total assets are illustrated by size of total assets. Corporate stock was the largest asset component in total and for each asset size group, except for the group under $\$ 100,000$. (For this group, cash, which is not shown here, was the largest asset component. The importance of cash in asset portfolios declines significantly with increases in the size of total assets.) The relative share of corporate stock increases with asset size. Corporate bonds and Government obligations, the second and third largest asset types, also generally increased in importance with increases in the size of the foundation but much more modestly than corporate stock.

Figure $B$ shows the three largest sources of receipts by size of total assets. Contributions share of total receipts declined as the size of the foundation

Figure A
The Three Principal Components of Total Assets, by Size of Total Assets, 1979

Percent of Total Assets


Corporate Stock
$\square$ Corporate Bonds

Government Obligations

increased, from 78 percent in the smallest asset size class to 31 percent in the largest size class: Since, by definition, the larger organizations have higher asset values, it is not surprising that interest and dividends, which are returns to assets, show steady increases in importance with increasing asset size. Dividends surpasses interest in the highest asset size class to become the second largest receipt component. This is attributable to the increasing significance of .corporate stock in asset portfolios of this group.

## FOUNDATION DISTRIBUTIONS

Figure $C$ shows three items relating to the required current minimum distribution for charitable purposes by size of investment assets (i.e., assets not used for charitable purposes). A minimum distribution ("distributable amount") must be made by foundations to avoid paying penalties. It is defined as the greater of net income ("adjusted net income") or a fixed percent of investment assets ("minimum investment return"). This percent is set each year by the Secretary of the Treasury on the basis of money market rates and was 5 percent in 1979. It is designed to ensure that foundations currently pay out at least what is a normal return on market obligations.

The fixed percent of investment assets was put into the computation of the required minimum distribution so that foundation philanthropic spending would be maintained even if net income were small or zero. In 1979, however, net income exceeded 5 percent of investment assets in each asset size class. The required distribution, which is the greater of net income or 5 percent of investment assets, barely exceeded net income in each size class. For any subgroup, the required distribution must exceed both
net income and 5 percent of investment assets unless one of these is larger for all foundations in. that group. That situation is very unlikely. However, the sizes of net income and 5 percent of investment assets relative to the required distribution are an indication of the significance of these two components in the computation of the required distribution. For 1979 net income was the more significant factor in the determination of the required distribution since the required distribution much more closely resembles net income than 5 percent of investment assets.

In the Economic Recovery Tax Act of 1981, the minimum distribution requirement was redefined to include only the fixed percent of assets. . This change will reduce the required minimum distribution for those nonoperating foundations whose net income exceeds their fixed percent of assets. This could reduce funds that foundations expend for charitable or similar purposes. For example, if this provision had existed for 1979, the required minimum distribution would have been $\$ 700$ million less.

Actual foundation distributions ("qualifying distributions") include expenditures made by foundations for their exempt purposes, amounts used to acquire additional exempt purpose assets, and amounts set aside for future expenditures for exempt purposes. Each of these three types of distributions can be used to meet the minimum distribution requirement. However, foundations can distribute more if they so desire. (Since operating foundations are required to distribute at least. 85 percent of their net income for exempt purposes, they are not subject to the distribution requirement.) In Figure $D$ the ratios of actual distributions and the required minimum distribution to investment assets by size of investment assets are shown.

Figure C
Foundation Distribution Items, by Size of Investment Assets



Size of Investment Assets

Figure D
Foundation Required Minimum Distributions and the Actual Distributions, by Size of Investment Assets

Percent of Investment Assets


Actual Distributions

Required Distributions


Actual distributions exceed required distributions in each asset size class. 'This difference declines considerably with increases in the size of the foundation. For the smallest foundations, the amount of actual distributions is over three times the size of the required distribution; for the largest foundations, these two items are nearly identical. Thus, the smaller foundations are much more likely to distribute more than is required than are the larger foundations. However, one point of clarification should be noted on the mechanics of the required distribution. Both components of the required distribution (i.e., net income and 5 percent of investment assets) are dependent on the size of assets. Contributions received by foundations are not included in either of these components. Since the smaller foundations are much more dependent upon contributions as a source of receipts than are the larger foundations, the required minimum distribution is considerably less binding on the smaller foundations. The larger foundations have relatively greater shares of the types of income that are included in net income, and, in addition, they have high asset. values. Both of these increase the significance of the required minimum distribution among the larger foundations. Therefore, the minimum distribution requirement is more applicable to the larger foundations. In general, the . smaller foundations distribute more of their income and do not build up a large asset base from which they could earn interest and dividends. The larger foundations distribute only slightly more than they are required, and these expenditures are from their investment incóme.

## SOURCES OF DATA AND METHOD OF ESTIMATION

Private foundation statistics are based on a sample of private foundation returns, Return of a Private Foundation Exempt from Income Tax (Form 990-PF), processed by the Internal Revenue Service during 1980. The sample was stratified based on the size of total assets and selected at rates that ranged from 7 percent to 100 percent. There were 9,438 returns in the sample drawn from an estimated population of 29,845. (See [7] for more details.)

In the 1979 study, only one return for each sampled foundation. was accepted in the sample and the estimated population. In the 1974 study, certain prior-year returns were included even when a given foundation also filed a more recent return during the current filing period. Prior-year returns were included based on the assumption that they would substitute for returns filed late. If the same methodology was used in 1979, the estimated number of foundations would have been approximately 1,700 higher. (All of these additional 1,700 foundations would have asset values less than $\$ 1$ million.)

Data for Income Years 1977 and 1978 are also available. These data were obtained directly from the IRS Master File system based on information transcribed for tax administration purposes from all returns filed in 1978 and 1979, respectively. However, these data were not further edited for statistical use. Moreover, they were derived from the entire population rather than from statistical samples. For these reasons, the data for 1977 and 1978 are not altogether comparable with those for 1974 and 1979 and were, therefore, not used in this article. Comparisons between the Master File data and the data in the studies cited in this article can be found in the IRS study, . Statistics of Income--1974-1978, Private Foundations [5], and two papers which are listed in the Bibliographical References and Notes [7, 8].

## COEFFICIENTS OF VARIATION

As the data presented in this article are estimates based upon a sample of documents filed with the Internal Revenue Service, they are subject to sampling, as well as nonsampling, errors. To properly use the statistical data provided, the magnitude of the sampling errors must be known. Coefficients of variation (CV's), computed from the sample, are used to measure the magnitude of the sampling errors.

The table below presents approximated coefficients of variation (CV's) for frequency estimates. The approximate CV's shown here are intended only as a general indication of the reliability of the data. For numbers of foundations other than those shown below; the corresponding CV's can be estimated by interpolation.

The reliability of estimates based on samples, and the use of coefficients of variation for evaluating the precision of sample estimates are discussed in Appendix II.


Table 1. - Number of Foundations, Total and Selected Receipts and Total Deductions, Total and Selected Assets, Net Worth, Net Investment Income and Tax, and Distributions, by Size of Total Book Value of Assets
[All figures are estimates based on samples - money amounts are in thousands of dollars]

"Estimate shoutd be used with caution because of the small number of sample returns on which it was based.
NOTE: Detail may not add to total because of rounding.

Table 2. - Number of Foundations, Total and Selected Recelpts and Total Deductions, Total and Selected Assets, Net Worth, Net Investment Income and Tax, and Distributions, by Size of Total Fair Market Value of Assets
[All figures are estimates based on samples - money amounts are in thousands of dollars]


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

Table 3. - Balance Sheets and Income Statements, by Size of Total Book Value of Assets
[All figures are estimates based on samples - money amounts are in thousands of dollars]

'Less than $\$ 500$.
NOTE: Detail may not add to total because of rounding.

Table 4. - Balance Sheets and Income Statements, by Size of Total Fair Market Value of Assets
[All figures are estimates based on samples - money amounts are in thousands of dollars]


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

Table 5. - All Foundations - Balance Sheets and Income Statements, by Size of Total Recelpts
[All figures are estimates based on samples - money amounts are in thousands of dollars]


[^2]NOTE: Detail may not add to total because of rounding.

Table 6. - All Foundations - Balance Sheets and Income Statements, by Size of Total Contributions Received
[All figures are estimates based on samples - money amounts are in thousands of dollars]


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

Table 7. - Number of Foundations, by Size of Total Book Value of Assets and by Size of Total Fair Market Value of Assets
[All figures are estimates based on samples]


[^3]NOTE: Detail may not add to total because of rounding.

Table 8. - Selected Balance Sheet and Income Statement Items, and Reconciliation of Net Worth, by Size of Total Book Value of Assets
[All figures 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 was based.
'Less than $\$ 500$.
'Less than $\$ 500$.

Table 9. - Nonoperating Foundations - Balance Sheets and Income Statements, by Size of Total Book Value of Assets
[All figures are estimates based on samples - money amounts are in thousands of dollars]

'Less than $\$ 500$.
NOTE: Detail may not add to total because of rounding.

$24 \begin{gathered}\text { Private Foundations/1979 } \\ \text { Table 10. - Nonoperating Foundations - Balance Sheets and Income Statement }\end{gathered}$

Table 11. - Nonoperating Foundations - Selected Balance Sheet and Income Statement Items, and Distributions, by Ratio of Investment Income to Total Fair Market Value of Assets
[All figures 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 was based.
NOTE: Detail may not add to total because of rounding.

Table 12. - Nonoperating Foundations - Computation of Minimum Investment Return, Distributable Amount, and Qualifying Distributions, by Size of Total Assets Not Held for Charitable Purposes
[All figures 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 was based Less than $\$ 500$
NOTE: Detail may not add to total because of rounding.

Table 13. - Nonoperating Foundations - Computation of Minimum Investment Return, Distributable Amount, and Qualifying Distributions, by Ratlo of Qualifying Distributions to Total Assets Not Held for Charitable Purposes
[All figures are estimates based on samples - money amounts are in thousands of dollars]

| Item | Ratio of qualitying distributions to total assots |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Total | Under 3 percent | 3 percent under <br> 4 percent | 4 percent under 5 percent | 5 percent under 6 percent | 6 percent under <br> 7 percent | $\begin{aligned} & 7 \text { percent } \\ & \text { under } \\ & 8 \text { percent } \end{aligned}$ | $\begin{aligned} & 8 \text { percent } \\ & \text { under } \\ & 9 \text { percent } \end{aligned}$ | 9 percent under <br> 10 percent | 10 percent or more |
| Number of nonoperating foundations...... Computation of minimum investment return: | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
|  | 26,970 | 6,870 | 886 | 1,495 | 2,345 | 2,469 | 1,988 | 1,240 | $907$ | $8,770$ |
| Fair market value of assets not used directly in carrying out exempt purposes, total. Monthly average of securities at fair market | 37,293,832 | 1,517,985 | 2,534,086 | 4,625,639 | 8,667,819 | 9,507,499 | 3,807.388 | 1,348,480 | 710,980 | 4,573,955 |
| value............................................... | 32,798,259 | 1,010,533 | 2,333,769 | 4,031,665 | 7,818,359 | 8,783,400 | 3,474,078 | 1,156,772 | 576,106 43,543 | $3,613.577$ |
| Monthly average of cash balances................ | 1,344,014 | 105,438 <br> 402,014 | 92,610 107.708 | 125.757 468,217 | 214,342 | 163,265 560,834 | 123,070 210,240 | 70.052 121,656 | 43,543 91,332 | 405,937 $\mathbf{5 5 4 , 4 3 9}$ |
| Fair market value of all other assets .............. | $3,151,555$ 209,113 | 402,014 $\mathbf{9 1 , 5 7 2}$ | 107.708 11,909 | 468,217 | 631,118 21,784 | 560,834 3,689 | 21,240 1,932 | 121,656 1,108 | -1,292 | 63,484 |
| Equals: Net fair market value of assets not used directly in carrying out exempt purposes | 37,084,719 | 1,426,413 | 2,522,178 | $4,613,694$ 67,801 | $8,646,035$ 130,299 | $9,503,811$ 141,834 | $\begin{array}{r} 3,805,456 \\ 57,530 \end{array}$ | $\begin{array}{r} 1,347,373 \\ 20,447 \end{array}$ | $\begin{array}{r} 709,688 \\ 10,581 \end{array}$ | $\begin{array}{r} 4,510,070 \\ 70,501 \end{array}$ |
| Less: Cash held for charitable activities............. | 557,936 | 21,228 | 37.715 | 67,801 | 130,299 | 141,834 | 57,530 |  |  |  |
| Equals: Base for calculating minimum investment return | 36,526,779 | 1,405,185 | 2,484,463 | 4,545,893 | 8,515,736 | 9,361,976 | 3,747,926 | 1,326,925. | 699,107 | 4,439,568 |
| Minimum investment return....................... | 1,826,335 | 70,259 | 124,223 | 227,294 | 425,786 | 468,098 | 187,396 | 66,346 | 34,955 | 221,977 |
| Computation of distributable amount: Adjusted net income | 2,413,861 | 125,789 | 118,327 | 256,080 | 496,854 | 618,567 | 283,500 | 96,128 | 53,046 | 365,572 |
| Higher of adjusted net income or minimum investment return. | 2,502,567 | 138,760 | 136,253 | 269,493 | 520,983 | 625,550 | 286,868 | 96,903 | 54,002 | 373,754 |
| Minus: |  |  | 3,160 | 7,498 | 12,059 | 15,045 | 5,992 | 2,181 | 1,202 | 9,101 |
| Tax on investment income Tax on unrelated business income. | 59,080 4,957 | 2.842 710 | 3,16 | *,99 | 1,274 | 522 | $\cdot 1,575$ | ${ }^{\circ} 8$ | -146 | 609 |
| Equals: Distributable amount before adjustments... | 2,438,525 | 135,208 | 133,077 | 261,896 | 507,650 | 609,983 | 279,301 | 94,714 | 52,655 | 364.043 |
| Net adjustments ..... | 11,772 | *-30, | -358 | 394 | 397 | 529 | 264 | *1,386 | *25 | 9,165 |
| Positive adjustments: Number of foundations | 119 | *10 | 1 | 5 | 19 | *11 | 6 | *9 | * 5 | 53 |
| Amount. | 12,581 | *314 | () | 447 | 403 | - 529 | 264 | *1,386 | *27 | 9,211 |
| Negative adjustments: |  |  |  |  |  |  |  |  | 1 | 6 |
| Number of foundations. | [22 | 11 <br> 344 | 358 | 53 | 6 | 二 | 二 | - | 1 | * 46 |
| Equals: Distributable amount, adjusted | 2,450,298 | 135,177 | 132,719 | 262,290 | 508,047 | 610,512 | 279,564 | 96,101 | 52,680 | 373,208 |
| Total qualifying distributions. | 3,233,279 | 168,469 | 91,142 | 211,409 | 478,248 | 607,321 | 284,868 | 114,227 | 66,967 | 1,210,627 |
| Disbursements for exempt purposes: |  |  |  |  |  |  |  |  |  |  |
| Number of toundations. | 24,304 | 4,220 | 886 | 1.495 | 2,345 | 52.462 | 1,986 | 112,240 | 65,036 | 8,762 $1,164,360$ |
| Amount. | 3,093,488 | 151,940 | 90,742 | 208,364 | 436,713 | 580,659 | 283,400 | 112,274 | 65,036 | 1,164,360 |
| Program related investments: |  |  |  | 2 | 18 | 7 | - 5 | ${ }^{*} 7$ | $\stackrel{2}{ }$ | 84 |
| Number of foundations Amount. | 148 9,463 | *140 | - 5 | 114 | *171 | *2,731 | * 403 | *684 | *34 | 5,182 |
| Amounts paid to acquire assets used for charitable purposes: |  |  |  |  |  |  |  |  |  |  |
| Number of foundations | 648 | 150 | 27 | 72 | 41 5.643 | 1,236 | 962 | 981 | 1,565 | 32,584 |
| Amount. | 62,025 | 15,902 | 395 | 2.757 | 5,643 | 1,236 | 962 | 981 |  | 32,584 |
| Amounts set aside for charitable purposes: Number of foundations.................. |  | 40 |  | 2 | -5 | 13 | 3 | -9 | *13 | 78 |
| Amount. | 68,302 | 487 |  | 174 | *35,722 | -22,694 | 104 | -287 | *333 | 8,501 |
| Total assets (book value) | 32,965,412 | 2,711,079 | 1,492,569 | 3,842,235 | 6,605,745 | 8,784,941 | 2,952,947 | 1,266,392 | 676,402 | 4,633,101 |
| Selected assets: |  |  |  |  |  |  |  | 177273 | 109,798 | 623.994 |
| Investments in government obligations | 3,977,883 | 258,034 | 204,862 | $410,394$ |  |  |  | 323,916 | 178,512 | 840,032 |
| Investments in corporate bonds. | 6,823,979 | 665,651 | 254,732 | $\begin{array}{r}737,176 \\ \hline 1967332\end{array}$ | $\begin{aligned} & 1,332,439 \\ & 3,439902 \end{aligned}$ | $\begin{aligned} & 1,858,315 \\ & 4,855,939 \end{aligned}$ | $\begin{array}{r} 633,206 \\ 1,380,955 \end{array}$ | 538,845 | 213,514 | 840,032 1,475,574 |
| Investments in corporate stock.... | 15,404,886 | 736,293 | 796,532 | 1,967,332 | 3,439,902 | 4,855,939 | 1,380,955 |  | 213,514 | 1,475,574 |

"Estimate should be used with caution because of the small number of sample returns on which it was based.
'Less than $\$ 500$
NOTE: Detail may not add to total because of rounding.

## glossary of terms

Non-technical terminology has been used in this article, wherever possible, to assist the understanding of the statistical content. However, in Tables $1-13$ the technical terms are used as they appear on the tax return form. Therefore, to assist users of these data, explanations of some of these terms are provided with both their technical and nontechnical meanings. (The latter are denoted in parentheses.) A more comprehensive glossary of terms appears in Statistics of Income--1974-1978, Private Foundations [5].

## Adjusted Net Income (Receipts Less Expenses)

This item represented the excess of the gross income derived from, or in connection with, property held by the foundation reduced by allowable deductions. It included investment income, net short-term capital gain, repayment of "qualifying distributions," gross profit from business activities, and certain miscellaneous income. Excluded from income were gross contributions, gifts and grants (received), contributions from split-interest trusts, gross dues and assessments, net long-term capital gain, and net gain or loss from the sale of nonbusiness assets.

The amount of adjusted net income was one of the amounts used in determining the amount of charitable distributions that the foundation was required to make.

Distributable-Amount (Required-Minimum Distribution)
Distributable amount was the greater of the foundations' "minimum investment return" or "adjusted net income," less taxes on net investment income and unrelated business income, and net of any adjustments. Distributable amount represented the minimum payout which had to be distributed by the end of the year after the year for which the return was filed in order to avoid payment of an excise tax for failure to currently distribute income.

Expenditures for Exempt Purposes (Philanthropic or Charitable Spending)

These deductions represented expenditures for activities that were directly related to the taxexempt purposes of the foundation. Included were necessary and reasonable administrative expenses paid for charitable, scientific, educational, or other similar purposes. These amounts were determined solely on the cash receipts and disbursements method of accounting.

## Minimum Investment Return (Fixed Percent of Assets)

This was the aggregate fair market value of assets not used for charitable purposes less the sum of indebtedness incurred to acquire those assets and cash held for charitable activities, multiplied by a specified percentage of total assets. For taxable years beginning after December 31, 1975, and all succeeding years, the percentage was set at 5 percent. The rate was subject to change by the Secretary of the Treasury each year depending on money market interest rates and investment yields.

If the minimum investment return exceeded the "adjusted net income," it became the basis for calcul-
ating the "distributable amount." The purpose of establishing a minimum investment return was to insure that a foundation distributed for charitable purposes at least a specified percentage of its noncharitable assets, (i.e., assets held for investment purposes).

## Nonoperating Foundations

Nonoperating foundations were organizations that carried on their charitable activities in an indirect manner by making grants to other organizations that were directly engaged in charitable activities, rather than engaging in charitable activities themselves.

## Operating Foundations

These were private foundations that spent at least 85 percent of their adjusted net income directly on the conduct of the activities constituting the purpose or function for which they were exempt (the "income test"). In addition to the income test, operating foundations must have met one of the following tests: the "assets test," the "endowment test," or the "support test".
A) Foundations met the "assets test" if 65 percent or more of their assets were devoted directly to taxexempt activities or to functionally related businesses that were related to the exempt purpose of the foundation.
B) Foundations met the "endowment test" if they made qualifying distributions directly related to the active conduct of their tax-exempt function, of at least two-thirds of their "minimum investment return."
C) Foundations met the "support test" if at least 85 percent of their support (exclusive of gross investment income) came from at least five unrelated tax-exempt organizations or from the general public (or both). In addition, no more than 25 percent of their support (exclusive of gross investment income) was derived from any one such exempt organization and no more than half of their support was derived from gross investment income.

## Qualifying Distributions (Actual Distributions)

These were direct expenditures for charitable purposes or for assets used for such purposes. They included payouts to public charities and operating foundations, and payouts to other private foundations, if. the recipient foundation agreed to distribute the same amount for charitable purposes by the end of the following tax year. In addition, funds set aside for major tax-exempt projects were also included. Qualifying distributions were creditable against a private foundation's obligation to pay out its "distributable amount."

## Value of Noncharitable Assets (Investment Assets)

For purposes of calculating "minimum investment return," only the assets that were not used or held for use for exempt purposes entered the computation. An asset was not used directly in carrying out the foundation's exempt purpose if the asset was not. used in the carrying on of a charitable, educational or other similar function which gave rise to the exempt status of the foundation.

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# Superfund for Environmental Taxes 

By Janet Barnhardt*

After the first full year of the "Superfund," environmental excise taxes reported for this fund have amounted to $\$ 229.2$ million before adjustments. of this amount, $\$ 33.5$ million are from taxes on petroleum, and $\$ 195.7$ million are from taxes on certain chemicals deemed to be hazardous. The "Superfund" was established under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) for the purpose of cleaning up chemical spills and hazardous waste disposal sites that have been abandoned.

The excise taxes are levied on products falling into three general categories--petroleum, petrochemicals, and inorganic chemicals. The largest share of taxes reported to date--66 percent--has been from petrochemicals, while the smallest is from petroleum.

## Sources of Environmental Taxes, Quarters Ending June 30, 1981, through March 30, 1982



Although contributing the largest share to the "Superfund," petrochemicals have been reported by the least number of filers, resulting in the largest average tax per business of the three groups.

Environmental Taxes
Quarters Ending June 30, 1981, through March 30, 1982

| $\begin{aligned} & \text { Environmental } \\ & \text { Tax } \\ & \hline \end{aligned}$ | Number of Businesses | $\begin{gathered} \text { Environmental } \\ \text { Tax } \end{gathered}$ | Average per Business |
| :---: | :---: | :---: | :---: |
| Petroleum | 293 | \$ 33,533,000 | \$114,000 |
| Chemicals: |  |  |  |
| Petrochemicals | 171 | 150,920,000 | 883,000 |
| Inorganics | 301 | 43,378,000 | 144,000 |
| Not allocable | 31 | 1,393,000 | 45,000 |

TAX ON PETROLEUM
The requirements for filing and reporting a tax on petroleum apply to the following:

1) operators of U.S. refineries receiving crude oil;
2) importers of petroleum products for consumption, use, or warehousing; or
3) users or exporters of crude oil on which the environmental tax has not been paid.

Since the tax is imposed only once on a product, if it has already been paid it can not be imposed again on another business that would otherwise be liable. For example, if crude oil is taxed at one refinery and is then shipped to another refinery for its use, then the second refinery would not be liable for taxes.

Taxes on 4.2 billion barrels of petroleum have been reported by 293 businesses and have amounted to $\$ 33.5$ million. Of this, $\$ 19.8$ million were reported for 1981 and $\$ 13.7$ million for the first two quarters of 1982.
tax on the sale and use of certain chemicals
The requirements for filing and reporting this tax apply to any importer, manufacturer, or producer that sells or uses any of the 42 taxable chemicals listed in Table l. There are some exceptions to what is taxed, so that the following are nontaxable:

1) ammonia, if used directly as a fertilizer;

[^4]2) methane or butane used as a fuel (however, the business using the chemical for a taxable purpose is liable);
3) nitric acid, sulfuric acid, ammonia, or methane used in the production of ammonia that is used for fertilizer;
4) sulfuric acid produced solely as a byproduct of and on the same site as air pollution control equipment; or
5) any substance derived from coal.

Of the $\$ 195.7$ million in tax liability. reported for chemicals, $\$ 1.4$ million was for chemicals that were not identified. This was due primarily to the filer reporting only the total of all chemicals and not indicating the specific types that were taxable.

## Petrochemicals

Taxes reported for the petrochemicals have amounted to $\$ 150.9$ million to date (representing 31.7 million tons taxed), of which $\$ 86.8$ million were for 1981 and $\$ 64.1$ million for 1982 . The 11 petrochemicals that were taxed were those which have been derived or isolated from either petroleum or natural gas. The taxes were reported by 171 businesses, resulting in an overall average of $\$ 13.7$ million reported per chemical.
of the 11 petrochemicals, there were two that dominated. the tax statistics-- ethylene and propylene. These two chemicals also dominated the petrōchemical industry as major "byprodučts of petroleum refining and natural gas extraction and are used in plastics, fibers, and rubber products. Taxes for ethylene accounted for $\$ 56.5$ million with 11.6 million tons taxed, and propylene amounted to $\$ 29.2$ million with 6.0 million tons taxed. These same two chemicals had the highest average tax. per business, with ethylene averaging $\$ 1,713,000$ and propylene, \$649,000.

The chemicals that were reported by the most businesses were toluene and xylene, followed by benzene and propylene. At the other end, naphthalene and butylene were the least frequently reported.

## Inorganics

Taxes reported for the 31 inorganic chemicals amounted to $\$ 43.4$ million. Inorganic chemicals are chemicals which do not have a carbon base, that is, their origins are something other than plant or animal materials. For 1981, $\$ 24.2$ million in taxes were reported, while to date for 1982, about $\$ 19.2$ million has been reported.

The largest amount of taxes, was reported for chlorine ( $\$ 23.5$ million) and ammonia ( $\$ 8.1$ million). These chemicals are widely used in synthetic fibers, plastics and explosives.: The largest average tax per filer was $\$ 561,000$ for chlorine and $\$ 182,000$ for phosphorus. In addition, the most frequently reported chemicals were sulfuric acid, amonia, and hydrochloric acid; while barium sulfide and potassium dichromate were the least frequently reported.

## BRIEF HISTORY OF THE SUPERFUND LEGISLATION

Hazardous chemical waste problems have evolved from the production of such everyday products as plastics, paints, dyes, glazes, adhesives, fertilizers, detergents, cosmetics, flame .retardant textiles, man-made textiles, pesticides, and toiletries. Toxic chemicals are also used in the production of metals, petroleum products, glass, and mirrors. In addition to the increase in the variety of uses of toxic chemicals, the chemical industry has shown enormous growth, producing nearly 11 times more than in 1947.

The effect of improper waste disposal can result in catastrophic situations including "contamination of groundwater (the source of half the nation's drinking water), habitat destruction, adverse human health effects, soil contamination, fish kills, livestock loss, municipal treatment plant outages, and crop damage."[1]

To deal with the problems of hazardous wastes, the Administration recommended the establishment of a "Superfund" in June 1979. The legislation was enacted in December 1980.

The five stated objectives of CERCLA were:
-"To assure that those responsible for any actual or potential threat to public health, welfare or the environment caused by releases of hazardous substances, pollutants or contaminants bear the costs of their actions;
-To establish a trust fund to finance, response action where a liable party does not clean up, cannot be found, or cannot pay the cost of cleanup of the site or spill;
-To base the Fund primarily on contributions from those who have been generically associated with such problems. in the past and who today derive profits from products and services associated with such substances;
-To establish a mechanism to achieve longer term remedial cleanup which involves States as true partners with the Federal government;
-To provide adequate. Federal response authority to help clean up hazardous chemical disasters" ${ }^{[2]}$.

The provisions of the Act called for the creation of a. \$1.6 billion Hazardous. Substance Response Fund, commonly referred to as the "Superfund." Of this amount, $\$ 1.38$ billion would be collected in the form of excise taxes, with the remainder coming from Federal appropriations. These taxes were to be collected over a five-year period effective April 1, 1981.

## Data Sources and Limitations

The Quarterly Excise Tax Return, Form 720, is the form on which environmental taxes are reported. Form 6627, Environmental Taxes, is the supporting schedule where the tax liability for petroleum and chemicals is computed. These returns are the basic source of data for this study. Data in this article reflect information reported on those returns filed and processed by July 8, 1982, for the four tax quarters ending June 30, 1981, through March 31, 1982.

Any adjustments, credits, or refunds, to environmental taxes either on the Form 720 or Form 843, Claim, are not reflected in the data. A taxpayer could take an adjustment or credit if a taxed chemical were later used to manufacture or produce any other substance subject to the tax. If a tax were paid on a chemical subsequently used to produce fertilizer, a credit or adjustment could also be claimed. Only those taxes reported on the Form 6627 are included; no adjustments, credits, or refunds from either the Form 720 or Form 843 are included in the data.

The Internal Revenue Service also releases environmental tax statistics in a report on excise taxes that is issued quarterly [3]. These figures, taken from the Form 720, show the liability, after adjustments, of returns recorded in the computerized Business Master File (BMF) as part of routine processing. Returns are due for filing one month after the end of the quarter in which the business is liable for environmental taxes. Therefore, the report covers what was recorded during a quarter, regardless of the specific tax period, unlike the data presented in this article. As a result, the two series of data are not directly comparable.

Since no statistical sampling was involved, the data are not subject to sampling error, but may by subject to nonsampling error. Attempts were made to secure all returns filed but returns may have been omitted if they were not forwarded for the study. In addition, the returns were passed through a series of validation tests to verify the accuracy of the return entries. In those cases where the data supplied on the return were incomplete, such as when there was a total for chemical taxes without the required subtotals, the business was contacted to obtain the information.

## NOTES AND REFERENCES

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[3]"Internal Revenue Collections of Excise Taxes," released quarterly by the Internal Revenue Service.

Table 1.--Environmental Taxes Reported by Type of Substance, Quarters Ending June 30, 1981, Through March 31, 1982

| Type of substance | Number of businesses | Tax rate per ton (dollars) | Number of tons (000's) | Environmen- tal taxes (thousand dollars) |
| :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | . ${ }^{\text {(3) }}$ | (4) |
| Petroleum. | 29 | $0.0079^{1}$ | 4, 244, $707^{2}$ | 33,533. |
| Petrochemicals, total. | $171{ }^{3}$ | N/A | 31,731 | 150,920 |
| Acetylene. | 33 | 4.87 | 150 | 733 |
| Benzene. | 51 | 4.87 | 3,526 | 17,170. |
| Butane.. | 24. | 4.87 | 891 | 4,338 |
| Butylene. | 19 | 4.87 | 909 | 4,427 |
| Butadiene. | 24 | 4.87 | 1,312 | 6,388 |
| Ethylene. | 33 | 4.87 | 11,608 | 56,531 |
| Methane.. | 25 | 3.44 | 2,524 | 8,684 |
| Naphthalene. | 4 | 4.87 | 53 | 256 |
| Propylene. | 45 | 4.87 | 6,000 | 29,218 |
| Toluene. | 67 | 4.87 | 1,736 | 8,454 |
| Xylene.. | 56 | 4.87 | 3,023 | 14,723 |
| Inorganics, total. | $301{ }^{3}$ | N/A | 35,062 | 43,378 |
| Ammonia.. |  | 2.64 | 3,068 | 8,099 |
| Antimony.. |  | 4.45 |  |  |
| Antimony trioxide.. | 18 | 3.75 | 17 | . 65 |
| Arsenic.......... Arsenic |  | 4.45 | (4) |  |
| Arsenic trioxide. Bartum sulfide... | 14 $*$ | 3.41 <br> 2.30 | $\underset{\text { 23 }}{\substack{\text { \% }}}$ | $\stackrel{80}{*}$ |
| ${ }_{\text {Bramine. }}^{\text {Barium sulfide }}$ - | 6. | $\begin{array}{r}2.31 \\ -4.45 \\ \hline\end{array}$ | - 132 | -- 589 |
| Cadmium. . | 22 | 4.45 |  | 10 |
| Chlorine. | 42 | 2.70 | 8,722 | 23,548. |
| Chromium. | 14 | 4.45 | 36 | 161 |
| Chromite............ | 15 | 1.52 | 343 | 522 |
| Potassium dichromat | * | 1.69 |  |  |
| Sodium dichromate. Cobalt........... | ${ }^{2} 6$ | 1.87 4.45 |  |  |
| Cupric sulphate. | 19 | 1.87 | 21 | 40. |
| Cupric oxide.. | 12 | 3.59 | 4 | 15 |
| Cuprous oxide... |  | 3.97 | 3 | 14. |
| Hydrochloric acid. | 67 | 0.29 | 1,852 | 537 |
| Hydrogen fluoride. | 12 | 4.23 | 265 | 1,122. |
| Lead oxide. | 31 | 4.14 | 269 | 1,113* |
| Mercury.... | 5 | 4.45 | 2 | 7 |
| Nickel. | 18 | 4.45 | 108 | 480 |
| Phosphorus... | 8 | 4.45 | 327 | 1,454 |
| Stannous chloride. |  | 2.85 |  |  |
| Stannic chloride.. | 8 | 2.12 | 7 | 16 |
| Zinc chloride. Zinc sulfate. | 15 | 2.22 | 23 | 51 |
| ${ }_{\text {Zinc sulfate...... }}^{\text {Potassuim }}$ hydroxide | 20 | 1.90 | 30 | 58 |
| Potassuim hydroxide Sodium hydroxide. | 18 | 0.22 | 241 | 53 |
| Sodium hydroxide. Sulfuric acid.... | 57. | 0.28 | 9,008 | 2,522 |
| Sulfuric acid... Nitric acid.... | 86 28 | 0.26 0.24 | 9,268 1,396 | 2,410 335 |
| Not allocable. | 31 | N/A | N/A | 1,393 |

[^5]
# Projections of Returns to be Filed in Fiscal Years 1983-1990 

## By Patrick O'Keefe and John Padden*

The number of tax returns and supplemental documents filed in Fiscal Year 1983 is projected to be 171.9 million, an increase of 0.7 percent over the estimated 170.7 million 1982 filings [1]. This growth rate is down sharply from the 2.5 percent increase registered in 1982. Individual income tax returns, the largest component of returns filed, are expected to show little growth from 1982 to 1983 because of the reduction in employment caused by the declining economy.

Changes in filings of individual income tax returns have historically been closely linked to changes in employment. The anticipated economic recovery in 1983 is expected to boost primary returns filed by 3.0 percent in 1984 and 2.8 percent in 1985. After 1985, because of demographic factors that will hold down economic growth, growth rates of returns filed are expected to decrease slightly until they reach 2.3 percent in 1990.

Major changes are being introduced this year which will greatly affect the projections of individual returns and the number of total returns. Filings of Form l040ES, Individual Declarations of Estimated Tax, are now being projected on a voucher (quarterly payment) count basis instead of a taxpayer entity basis as they were last year. This will increase the projected number of Form 1040ES returns by about 20 million in 1983 because approximately 3 vouchers are filed by each individual filing a Form lo40es.

Beginning in Filing Year 1983, single taxpayers will have the option of filing a new individual income tax return, form l040EZ. This return will replace many of the 1040As currently being filed. Nearly 11 million Form lO40EZ's are projected to be filed in 1983. In addition to these major changes, some provisions of the Economic Recovery Tax Act of 1981 are expected to bring about a decrease in 1983 filings of estate tax and gift tax returns; other compliance provisions of the Tax Act will increase the number of tax returns to be filed.

Total returns are projected to increase by 23.6 percent from 1981 to 1990 , a 2.4 percent compound annual rate of growth. Individual returns are projected to grow 16.7 percent. Some of the tax returns projected to grow faster than average include individual declarations of estimated tax, employee plans, fiduciary, corporate, and most of the forms included in the category of supplemental documents.

The compound annual growth rates are illustrated in Figure 1. Figure 2 shows the total number of returns in different categories.

The projections for 1983 and changes from 1982 are as follows:

|  | $\begin{gathered} 1983 \\ \text { Projection } \\ \hline \end{gathered}$ | $\begin{gathered} \text { Change From } \\ \hline \end{gathered}$ |
| :---: | :---: | :---: |
| Type of Return | (000) | \% |
| Total | 171,926 | 0.7 |
| Individual | 95,850 | * |
| Fiduciary | 2,103 | 4.0 |
| Partnership | 1,523 | 2.6 |
| Corporation | 3,012 | 2.9 |
| Estate and Gift | 200 | -13.0 |
| Employment | 26,178 | 0.9 |
| Individual Declarations | 32,730 | 2.5 |
| Other | 10,330 | 0.2 |

## General Summary

The projected number of returns to be filed consists of primary returns, supplemental documents, and non-master file returns. This year they are being projected based on the number of returns processed rather than returns received. Returns received are returns counted as they arrive and are counted at one of the ten IRS service centers. The present level, returns processed, are returns counted as they are posted to one of the master files at the IRS National Computer Center. This results in a modest reduction in level of about 0.2 percent [2].

The primary returns, numbering about 160 million in 1981, are a major part of the IRS workload. Included are such returns as Form 1040 and Form 1040A, U.S.

[^6]Figure 1
Projected Compound Annual Percent Change in Number: of Returns Processed, 1981-1990

## Figure 2 <br> Number of Returns by Type 1983 and 1990



Individual Income Tax Returns; Form 1120, U.S. Corporation Income Tax Return; Form 1040ES, Individual Declaration of Estimated Tax; and Form 941, Employers Quarterly Federal Tax Return.

The supplemental documents are mostly amended returns and requests for filing extensions for both individuals and corporations. The category, non-master file returns, totaling 55,000 in 1981, includes a variety of small-volume returns, such as Employer's Monthly and Quarterly Tax Returns and Quarterly Federal Excise Tax Returns. Not included in any of these categories are almost 400 million information documents such as forms for the reporting of interest and dividend income by payers of such income.

## Individual Income Tax Returns

Projections of Forms 1040 and 1040A are somewhat lower for each projected year than projections made last year. [3] The estimates for the Fiscal Years 1983-1985 have been reduced due to the lower employment during the current recession. Employment is expected to decrease to 102.0 million during 1982 from 102.5 million in 1981. When combined with other variables, the net result will be a small increase of 47,000 individual tax returns in 1983.

In 1983, a new individual income tax return, form lO40EZ, will be introduced. To be eligible to file a Form lo40EZ, a taxpayer must be single, claim no dependents, claim no exemptions for age or blindness, and have taxable income of less than $\$ 50,000$. Interest income of $\$ 400$ or less is the only income other than wages that can be reported on this form. It is assumed that filers of Form lO40EZ are those who would have filed Form 1040A. Because of this, Form 1040A is expected to decline from 39.3 percent of all individual returns filed in 1981 to 23.5 percent in 1990. Filings of Form l040EZ are expected to comprise 11.5 percent of individual returns filed in 1983 and 16.1 percent in 1990.

The Tax Equity and Fiscal Responsibility Act of 1982 requires withholding at a flat rate of 10 percent on payments of interest and dividends beginning July 1, 1983. Payments to certain tax exempt institutions, corporations, low income elderly individuals, and to nominees or custodians are exempted. Interest payments made by individuals are generally exempted. In addition, the Act exempts individuals with no income tax liability in the preceding year. Other provisions impose an increased penalty for extended failure to file. Higher penalties will also now be imposed for failure to accurately report on certain information documents. As a result of this Act, approximately 200,000 additional return filings have been included in the projections beginning in 1984.

## Estate and Gift Tax Returns

Fewer estate and gift tax returns are expected to be filed because of changes in filing requirements mandated by the Economic Recovery Tax Act of 1981. Some of these include: (a) a gradual increase in the unified credit against estate and gift taxes over a 5 -year period, so that no tax will be imposed on transfers of $\$ 600,000$ or less by the end of that period; (b) a repeal of the limits on the marital deduction for estate and gift taxes; and (c) an increase in the excludable gifts in any single year to any individual person from $\$ 3,000$ to $\$ 10,000$. When fully effective, these provisions are expected to reduce the number of estate tax returns (Form 706) by more than 70 percent and the number of gift tax returns (Form 709) by more than 50 percent.

## Individual Declarations of Estimated Tax

The projections of Form l040ES are being done on a voucher basis for the first time. A lO40ES voucher is the form used by an individual to remit each quarterly payment. Each individual, or entity, may file as many as four vouchers a year. This results in far higher projections than the former method of projecting $1040 E S$ returns on a taxpayer entity basis. Voucher counts were three times higher than taxpayer entity counts in 1981.

Receipts of Form 1040ES have been rising at an increasing rate for the last four years. High interest rates have helped to raise the number of
lO40ES filers by about 30 percent from 1978 to 1982. Because of the higher number of l040ES returns filed in recent years, this year's projections of lO40ES returns for 1982 and 1983 are 16 percent above last year's projections, when compared on an entity basis. After 1985 the projected growth rates are expected to be about the same. as those projected last year. Projections include adjustments for later years to reflect the higher filing thresholds enacted by the Economic Recovery Tax Act of 1981. That Act raised the tax due filing, threshold, in annual $\$ 100$ increments, from $\$ 100$ in 1981 to $\$ 500$ in 1985. Projections for Form 1040ES. returns are based on the assumption that the current voucher system will continue. If the payment method shifts to the Federal Tax Deposit (F.T.D.) system, a similar number of F.T.D.'s would be filed. Under the F.T.D. system, taxpayers would deposit their estimated income and self-employment taxes with a Federal Reserve Bank or an authorized financial institution. This change would conform the method for individuals to that currently used by corporations for making their estimated tax payments.

## BASIC TABLE INFORMATION

Projections for the major types of primary returns for Fiscal Years 1983-1990 are shown in Table 1. For comparison purposes, actual receipt figures are shown for 1981 and estimated receipts are given for 1982.

## BASIC METHODOLOGY AND ASSUMPTIONS

The number of returns filed represents receipts of returns at IRS Service Centers during a fiscal year. Receipts for FY 1981 and earlier years are those reported in the Annual Reports of the Commissioner of Internal Revenue. [4]. Data for FY 1982 include actual receipts through June with the remainder of the fiscal year estimated. The estimated part in most cases was based on receipt patterns in FY 1981. Until FY 1976, fiscal years for the U.S. Government were from July through June. Beginning in FY 1977, fiscal years were changed to October through September.

The projections are based on regression models involving independent economic and demographic variables or on observed trends over time [5]. The models are updated to incorporate recent trends in return filing patterns and the current economic outlook. The models were developed. for calendar years.

To illustrate the general process, projections for the combined total of Forms 1040 and 1040 A for calendar years were prepared using a regression model which makes the projection a function of the forecasted values of total employment, employed married women, pension beneficiaries and annuitants, and a step function variable to adjust for the effect of the Tax Reduction and Simplification Act of 1977 [6]. The base period used was 1949-1982, with 1982 estimated on January-June receipts.

Calendar year projections for Forms ‘1040 and 1040A (current definition) were separately estimated before they were adjusted to the combined total, using regression models with employment, time, and a step function variable to adjust for the special emphasis by IRS to encourage eligible filers to use form 1040A. The resulting projections, were then adjusted for the effects of the Economic Recovery Tax Act of 1981 and the increased filing limit for Form 1040A.

Projections for Form lo40EZ were derived from the estimated number of Form 1040A filers eligible to use the new form. After the calendar year projections were completed, they were converted to fiscal year projections by using the Census Bureau's X-11Q Seasonal Adjustment Program to obtain seasonal factors [7].

Other individual returns forms in this group were each projected using similar types of models.

## References

[1] A full listing of the tax returns included in the categories shown in Table 1 can be found in the report specified in [4] below.
[2] Projections made this year are based on the number of returns processed as reported on an internal IRS report. Report Symbol No-TX-R-308. In previous years, projections were based on returns received as reported on a now discontinued report, Report Symbol NO-TX-R-24.
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Table 1.--Number of Returns by Type, Fiscal Years 1981-1990 ${ }^{1}$
[Thousands]

| Type of return | Actual | Estimated ${ }^{2}$ | Projected |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | 1981 | 1982 | 1983 | 1984 | 1985 | 1986 | 1987 | 1988 | 1989 | 1990 |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) |
| Grand total. | 166,528 | 170,650 | 171,926 | 177,027 | 182,068 | 187,034 | 191,906 | 196,495 | 201,246 | 205,870 |
| Individual, total. | 94,018 | 95,803 | 95,850 | 98,425 | 101,349 | 103,437 | 105,272 | 106,758 | 108,307 | 109,761 |
| Form 1040....... | 56,972 | 57,826 | 57,851 | 59,287 | 61,052 | 62,314 | 63,423 | 64,321 | 65,257 | 66,135 |
| Form 1040A. | 36,903 | 37,834 | 26,868 | 25,776 | 23,794 | 24,265 | 24,693 | 25,041 | 25,402 | 25,741 |
| Form 1040Ez. |  | 37,834 | 10,988 | 13,218 | 16,356 | 16,709 | 17,004 | 17,243 | 17,492 | 17,726 |
| Other... | 143 | 144 | 143 | 145 | 146 | 148 | 151 | 153 | 156 | 159 |
| Declaration of Estimated Tax (Individual)......... | 30,347 | 31,929 | 32,730 | 33,862 | 34,555 | 36,121 | 37,796 | 39,479 | 41,187 | 42,831 |
| Fiduciary.................. | 1,917 | 2,022 | 2,103 | 2,191 | 2,281 | 2,378 | 2,474 | 2,575 | 2,680 | 2,790 |
| Partnership............... | 1,467 | 1,484 | 1,523 | 1,564 | 1,607 | 1,652 | 1,699 | 1,748 | 1,799 | 1,852 |
| Corporation. . . . . . . . . . . | 2,806 | 2,928 | 3,012 | 3,109 | 3,210 | 3,312 | 3,424 | 3,537 | 3,659 | 3,789 |
| Estate Tax................ | 146 | 137 | 112 | 94 | 78 | 66 | 46 | 39 | 41 | 44 |
| Gift Tax.. | 199 | 93 | 88 | 98 | 105 | 117 | 128 | 142 | 156 | 169 |
| Employment Tax........... | 26,063 | 25,941 | 26,178 | 26,586 | 26,995 | 27,301 | 27,657 | 28,049 | 28,458 | 28,880 |
| Exempt Organization...... | 409 | 395 | 361 | 360 | 369 | 378 | 386 | 396 | 405 | 414 |
| Employee Plans........... . | 790 | 895 | 893 | 915 | 958 | 1,000 | 1,042 | 1,085 | 1,136 | 1,180 |
| Alcohol, Tobacco and Firearms. $\qquad$ | 523 | 549 | 550 | 550 | 550 | 550 | 550 | 550 | 550 | 550 |
| Excise Tax.............. | 971 | 855 | 860 | 867 | 875 | 883 | 892 | 900 | 909 | 917 |
| Selected Supplemental Documents ${ }^{3}$ | 6,817 | 7,561 | 7,628 | 8,346 | 9,076 | 9,777 | 10,477 | 11,172 | 11,893 | 12,626 |
| Non-Master File Returns ${ }^{4}$ | 56 | 56 | 58 | 59 | 61 | 62 | 64 | 65 | 67 | 68 |

Based on counts of returns processed. Projections made in previous years were based on returns received.
Estimated from returns processed through June 30, 1982.
${ }^{3}$ Includes Forms $1040 \mathrm{X}, 1120 \mathrm{X}, 2688,4868,7004,7005,990-\mathrm{AR}$ and $1041-\mathrm{A}$. Most of these documents relate to amended tax returns and applications for extensions to file tax returns,
${ }^{4}$ Includes Forms CT-2, $720 \mathrm{M}, 941-\mathrm{M}, 941-\mathrm{NMI}, 990-\mathrm{BL}, 1120-\mathrm{DISC}$, and 1042 . These are documents which are not included on one of he principal IRS master files for individuals, businesses, and employee benefit plans.
NOTE: Detail may not add to total due to rounding.

## Crude Oil Windfall Profit Tax for 1981

## By Michael Coleman*

The total windfall profit tax after adjustments reported since the inception of the Crude Oil Windfall Profit Tax Act amounted to almost $\$ 36$ billion through December 1981. Of this total, $\$ 26$ billion was reported during 1981. The sharp increase over 1980 was largely due to the full decontrol of oil prices in January 1981.
While 1981 witnessed a substantial increase in the total amount of windfall profit tax reported, the tax declined from a high of $\$ 7.2$ billion for the first quarter of the year to $\$ 5.5$ billion for the fourth quarter, a 23 percent drop. This decrease in total liability can be attributed to a combination of declining prices and a decrease in oil production. The average windfall profit tax per barrel declined from $\$ 9.63$ for the first quarter to $\$ 8.30$ for the fourth quarter, a drop of 13 percent. The number of barrels of oil declined from 687 million to 685 million.

The quarter ending December 1981 marked the second consecutive quarter that the average removal price (generally the price for which the oil is sold) decreased. The average price per barrel reached a high of $\$ 33$ in the second quarter of 1981 and then declined by about 6 percent to slightly less than $\$ 31$ per barrel in the fourth quarter. The decrease in the removal price was, in large part, the result of an abundant supply of foreign crude oil relative to worldwide demand, which in turn created a downward force on U.S. domestic oil prices. The decrease in U.S. demand for oil and gasoline has been attributed to a sluggish economy and increased conservation efforts.

## Components of Windfall Profit Tax Liability: Averages Per Barrel by Quarter Oil Removed"



[^7]
## Windfall Profit Tax After Adjustments (Millions)

| Quarter Ending | Tax Before Adjustments | Adjustments | Tax After Adjustments |
| :---: | :---: | :---: | :---: |
| Total | \$37,518 | -\$1,649 | \$35,869 |
| Mar. 1980 1/ | 788 | --- | 788 |
| June 1980 | 2,842 | -21 | 2,821 |
| Sept. 1980 | 3,413 | -88 | 3,325 |
| Dec. 1980 | 3,918 | -927 | 2,991 |
| Mar. 1981 | 6,953 | +242 | 7,195 |
| June 1981 | 7,253 | -107. | 7,146 |
| Sept. 1981 | 6,344 | -251 | 6,093 |
| Dec. 1981 | 6,007 | -497 | 5,510 |

$1 /$ One month only.
In addition to being affected by fluctuations in the removal price and the adjusted base price, the windfall profit tax is also affected by certain
adjustments. These adjustments can result from errors in withholding or from the net income limitation. When either of these occur, the depositing or withholding agent is responsible for correcting the error, to the extent possible, by adjusting the amounts withheld in succeeding quarters.

When comparing the adjustments made during 1980 and 1981, it is interesting to note that in the last quarter of each year there was a large negative adjustment. These large adjustments were due to the effects of the net income limitation which limits the windfall profit to 90 . percent of the net income per barrel of oil. Throughout the year, taxpayers not subject to withholding (i.e. large integrated oil companies) estimate their net income for each barrel. At year end, many of these taxpayers found they had overestimated their tax liability for previous quarters (because of having overestimated their net income) and therefore made adjustments on their fourth quarter returns to compensate for the previous overwithholding.

Table 1.--Windfall Profit Tax Liability by Oil Tier and Tax Rate for the Quarter Ending December 1981, Aggregate Components of Windfall Profit
[Money amounts are in millions of dollars]

| dax rate | $\begin{gathered} \text { Tax liability } \\ \text { before } \\ \text { adjustments, } \\ \text { quarter ended } \\ \text { December } 31 \text {; } \\ 1981 \end{gathered}$ | Returns with components of windfall profit ${ }^{\text {l }}$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Number of barrels of oil (000's) | $\begin{aligned} & \text { Removal } \\ & \text { value } \end{aligned}$ | Adjusted base value | State severance tax adjustment | $\begin{gathered} \text { Windfall } \\ \text { profit } \end{gathered}$ | ```Tax liability before adjustments``` |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) |
| All returns, total..... | 6,007 | 685,426 | -21,224 | 11,185 | 555 | 9,484 | 5,692 |
| Returns with tax liability shown by oil tier and tax rate, total |  |  |  |  |  |  |  |
| Tier one, other than Sadlerochit oil: |  |  | - 0 |  |  |  |  |
| - Taxed at 70 pericent......... | 3,894 | 321,403 | 10,616 | 4,797 | 260 | 5,559 | 3,891 |
| Taxed at 50 percent......... | 284 | 31,584 | 1,075 | 482 | 38 | 555 | 278 |
| Tier one, Sadlerochit oil: Taxed at 70 percent.......... | 473 | 118,948 | 2,594 | 1,795 | 123 | 676 | 473 |
| Taxed at 50 percent......... | , | 138 | 4 | 2 | - | 2 | 1 |
| Tier two oil: |  |  |  |  |  |  |  |
| Taxed at 60 percent......... | 483 | 55,270 | 1,831 | 990 | 38 | 803 | 482 |
| Taxed at 30 percent. | 146. | 32,443 | 1,108 | 608 | 20 | 480 | 144 |
| Tier three ofl (taxed at 30 percent): |  |  |  |  |  |  |  |
| Newly discovered oil........ | 336 | 87,773 | 3,029 | 1,859 | 69 | 1,101 | 330 |
| Incremental tertiary oil.... | $22^{\circ}$ | 6,286 |  | 132 | . 5 | 75 | 22 |
| Heavy oil................... | 70 | 31,581 | 756 | 521 | 1 | 234 | 70 |
| Total returns with components not shown. $\qquad$ | 297 |  | - | - | - | - | - |

[^8]Table 2.--Windfall Profit Tax Liability by 011 Tier and Tax Rate for the Quarter Ending December 1981, Components of Windfall Profit, Average Dollars per Barrel

| Oil tier and tax rate | Returns with components of windfall profit |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Remova1 price | Adjusted base price |  | Windfall profit | $\begin{gathered} \text { Tax } \\ \text { liability } \\ \text { before } \\ \text { adjustments } \end{gathered}$ |
|  | (1) | (2) | (3) | (4) | (5) |
| All returns, total. | 30.96 | 16.31 | . 80 | 13.85 | 8.30 |
| Tier one, other than Sadlerochit oil: |  |  |  |  |  |
| Taxed at 70 percent... | 33.02 34.04 | 14.92 15.25 | .81 1.20 | 17.29 17.59 |  |
| Taxed at 50 percent. | 34.04 | 15.25 | 1.20 | 17.59 | 8.80 |
| Tier one, Sadlerochit oil: |  |  |  |  |  |
| Taxed at 70 percent. | 21.80 | 15.08 | 1.03 | 5.69 | 3.98 |
| Taxed at 50 percent. | 29.81 | 15.25 | 1.39 | 13.17 | 6.59 |
| Tier two oil: |  |  |  |  |  |
| Taxed at 60 percent. | 33.12 | 17.90 | . 68 | 14.54 | 8.72 |
| Taxed at 30 percent. | 34.16 | 18.75 | . 62 | 14.79 | 4.44 |
| Tier three oil (taxed at 30 percent) : |  |  | 78 |  |  |
| Newly discovered oil...... | 34.50 | 21.18 | . 78 | 12.54 | 3.76 |
| Incremental tertiary oil. | 33.67 | 21.03 | . 75 | 11.89 | 3.57 |
| Heavy oil.. | 23.94 | 16.48 | . 03 | 7.43 | 2.23 |

Table 3.--Windfall Profit Tax Liability by 011 Tier and Tax Rate for January - December 1981, Aggregate Components of Windfall Profit
[Money amounts are in millions of dollars]

| Oil tier and tax rate | $\begin{gathered} \text { Tax liability } \\ \text { before } \\ \text { adjustments, } \\ \text { January - } \\ \text { December } \\ 1981 \end{gathered}$ | Returns with components of windfall profit ${ }^{1}$ |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | $\begin{aligned} & \text { Number of } \\ & \text { barrels } \\ & \text { of oil } \\ & \text { (000's) } \end{aligned}$ | Removal value | Adjusted base value | State severance tax adjustment | Windfall profit | $\begin{gathered} \text { Tax } \\ \text { liability } \\ \text { before } \\ \text { adjustments } \end{gathered}$ |
|  | (1) | (2) | (3) | (4) | (5) | (6) | (7) |
| All returns, total..... | 26,560 | 2,583,070 | 82,069 | 41,027 | 2,296 | 38,746 | 23,416 |
| Returns with tax liability shown by oil tier and tax rate, total |  |  |  |  |  |  |  |
| Tier one, other than Sadlerochit oil: |  |  |  |  |  |  |  |
| Taxed at 70 percent......... | 16,810 | 1,227,956 | 41,447 | 17,942 | 1,086 | 22,419 | 15,693 |
| Taxed at 50 percent......... | 1,221 | 116,293 | 4,028 | 1,735 | 135 | 2,158 | 1,079 |
| Tier one, Sadlerochit ofl: Taxed at 70 percent......... | 2,418 | 470,728 | 10,903 | 6,921 | 529 | 3,453 | 2,417 |
| Taxed at 50 percent......... | 9 | 1,016 | 35 | 15 | 1 | 19 | 9 |
| Tier two oil: <br> Taxed at 60 percent......... | 2,172 | 213,941 | 7,312 | 3,781 | 169 | 3,362 | 2,017 |
| Taxed at 30 percent. | 690 | 125,249 | 4,392 | 2,272 | 88 | 2,032 | 610 |
| ```Tier three oil (taxed at 30 percent):``` |  |  |  |  |  |  |  |
| Newly discovered oil........ | 1,354 | 292,084 | 10,397 | 6,063 | 264 | 4,070 | 1,221 |
| Incremental tertiary oil.... | 64 | 16,520 | 557 | 340 | 14 | 203 | 61 |
| Heavy oil.................. | 331 | 119,283 | 2,997 | 1,957 | 9 | 1,031 | 309 |
| Total returns with components not shown......................... | 1,490 | - | - | - | - | - | - |

[^9]Table 4.--Windfall Profit Tax Liability by 011 Tier and Tax Rate for January - December 1981, Components of Windfall Profit, Average Dollars per Barrel

| Oil tier and tax rate | Returns with components of windfall profit |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
|  | Removal price | Adjusted <br> base price | State severance tax adjustment | Windfall profit | Tax liability before adjustments |
| . | (1) | (2) | (3) | (4) | (5) |
| All returns, total. | 31.77 | 15.88 | . 89 | 15.00 | 9.07 |
| Tier one, other than Sadlerochit oil: |  |  |  |  |  |
| Taxed at 70 percent. | 33.75 | 14.61 | . .88 | 18.26 | 12.78 |
| Taxed at 50 percent. | 34.64 | 14.92 |  | 18.56 | 9.28 |
| Tier one, Sadlerochit oil: |  |  |  |  |  |
| Taxed at 70 percent..... | 23.16 | 14.70 | 1.12 | 7.34 | 5.13 |
| Taxed at 50 percent. | 34.45 | 14.76 | . 98 | 18.70 | 8.86 |
| Tier two oil: |  |  |  |  |  |
| Taxed at 60 percent. | 34.18 | 17.67 | . 79 | 15.71. | 9.43 |
| Taxed at 30 percent. | 35.07 | 18.14 | . 70 | 16.22 | 4.87 |
| Tier three oil (taxed at 30 percent) : |  |  |  |  |  |
| Newly discovered oil.... | 35.60 | 20.76 | . 90 | 13.93 | 4.18 |
| Incremental tertiary oil. | 33.72 | 20.58 | . 85 | 12.29 | 3.69 |
| Heavy oil............. | 25.13 | 16.41 | . 08 | 8.64 | 2.59 |

Table 5.--Exempt Oil Volume by Tier and Category, Quarter Ending December 1981 (Thousands of barrels)

|  | Total | Tier one | Tier one | Tier three |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  | $\begin{gathered} \text { Newly } \\ \text { discovered } \\ \text { of! } \end{gathered}$ | Incremental tertiary oil | $\begin{aligned} & \text { Heavy } \\ & \text { oil } \end{aligned}$ |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total. | 19,388 | 15,099 | 1,637 | 2,364 | 116. | 171 |
| Exempt governmental interest........... | 16,490 | 14;092 | 1,022 | 1,106 | 114 | 156 |
| Exempt charitable interest............. | 818 | 438 | . 269 | 101 | 2 | 7 |
| Exempt Indian oil... | 1,240 | 548 | - 347 | 338 | 1 | 7 |
| Exempt Alaskan oil..................... | 835 | 21 | $\therefore$ - | - 813 | - . - | - |
| Exempt front-end oil*. | 5 | - | - | 5 | - | - |

*Exempt front-end oil no longer exists. Taxpayers erroneously reported oil for this category. NOTE: Detail may not add to total because of rounding.

Table 6.--Exempt Oil Volume by Tier and Category, January - December 1981
(Thousands of barrels)

|  | Total | Tier one | Tier one | Tier three |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  | Incremental tertiary oil | Heavy oil |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total. | 72,865 | 57,454 | 8,497 | 5,879 | 385 | 643 |
| Exempt governmental interest. | 60,924 | 51,112 | 5,076 | 3,878 | 328 | 525 |
| Exempt charitable interest. | 3,627 | 2,046 | 1,030 | 455 | 56 | 40 |
| Exempt Indian oil.. | 4,375 | 2,058 | 1,620 | 677 | 1 | 21 |
| Exempt Alaskan oil.. | 855 | 29 | 5 | 820 | - | - |
| Exempt front-end oil*.. | 3,083 | 2,211 | 766 | 48 | - | 57 |

*Exempt front-end oil no longer exists. Taxpayers erroneously reported oil for this category.
NOTE: Detail may not add to total because of rounding.

## DATA SOURCES AND LIMITATIONS

The Quarterly Federal Excise Tax Return, Form 720, is the form on which the windfall profit tax is reported. Form 6047, Windfall Profit Tax, shows how the tax is computed and is filed as an attachment to Form 720. Returns are due two months after the end of the quarter in which the oil is removed.

The data for 1980 are based on all returns filed without regard to amount of liability. Data for 1981 are based on all returns with a tax liability of \$l million or more before adjustments and a 10 percent sample of all other returns. Data formerly published for the first quarter of 1981 were based on returns with a tax liability of $\$ 1$ million or more before adjustments, adjusted upward to estimate total liability and barrels of oil. All data may be revised as additional returns are received.

Sampling and nonsampling errors were controlled by a variety of methods. Missing returns were requested from the service centers. However, some returns may have been omitted due to time and resource constraints. Attempts were made to correct imbalances in taxpayer entries for the components of windfall profit; if this proved impossible, an out-of-balance return was treated as a return on which the components were not reported, and therefore only the liability for each tier was tabulated. A number of verification checks were performed at all stages of manual data abstraction and computer tabulation.

## DEFINITIONS

Brief definitions of the terms used in these tables are given below.

Adjusted Base Price.--For tier one and tier two oil, it is the base price multiplied by the inflation adjustment, which is derived from the "implicit price deflator" published by the Department of Commerce. [3]

Adjustments to Liability.--Corrections applied to the current quarter's liability in order to correct for the net income limitation and over- and underwithholding in previous quarters.

Base Price.--For tier one oil, the upper tier ceiling price, as defined by Department of Energy price control regulations, which would have applied to the oil had it been produced and sold in May 1979, reduced by 21 cents. For tier two and three oil, the base prices were $\$ 15.20$ and $\$ 16.55$, respectively, adjusted for grade and quality.

Crude Oil:--The term applies only to natural crude petroleum and does'not include synthetic petroleum, such as oil from shale or tar sands. It does, however, include natural gas liquids treated as crude oil under the June 1979 energy pricing regulations issued by the Department of Energy.

Exempt Alaskan Oil.--Oil from a reservoir other than the Sadlerochit reservoir that has been commercially exploited by any well north of the Arctic Circle; and oil produced north of the Alaska-Aleutian Range, and at least 75 miles from the nearest point of the TransAlaskan Pipeline System.

Exempt Charitable Oil.--Oil produced from economic interests held by qualified charitable medical facilities, educational institutions, and child care organizations (as defined in Internal Revenue Code section 170), if such interest was held on January 21 , 1980, and at all times thereafter: and oil produced from interests held by a church on January 21, 1980, if, prior to January 22, 1980, the net proceeds of such oil were dedicated to the support of a medical facility or educational institution.

Exempt Front-End Oil.--Certain oil that the Department of Energy deregulates to be used to finance a tertiary recovery project (see Tier Three Oil, Incremental Tertiary Oil). This category of oil now no longer exists due to the deregulation of. all domestic oil after January 28, 1981.

Exempt Governmental Oil.--Oil produced from an economic interest held by a State or political subdivision (including agencies and instrumentalities), the net income from which is used for public purposes.

Exempt - Indian Oil.--Oil produced from mineral interests held by or on behalf. of Indian tribes or individuals on January 21, 1980, which is one of the following: (a) production received by Indian tribes and individuals from Tribal Trust Lands (the title to such land is held by the United States in trust for the tribes), (b) production from land or mineral interests held by an Indian tribe eligible for services provided to Indians by the Secretary of the Interior, or (c) oil proceeds which are paid into the U.S. Treasury to the credit of tribal or native trust funds pursuant to law. This exemption also applies to production of any Alaskan Native Corporation prior to 1991.

Net Income Limitation.--The windfall profit on a barrel of oil may not exceed 90 percent of the net income attributable to the barrel.

Removal Price.--Generally, the price for which a barrel of oil is sold. In some instances, a constructive sale price is used.

Sadlerochit Oil.--Crude oil production from the Sadlerochit reservoir in the Prudhoe Bay oil field in Alaska.

State Severance Tax Adjustment.--A State severance tax is a tax imposed by a State with respect to the extraction of oil. The windfall profit is reduced by the amount by which the severance tax exceeds that which would have been imposed had the oil been valued at its adjusted base price.

Stripper Oil.--In general, oil from a property from which the average daily production per well has been 10 barrels or less for any consecutive 12 -month period after 1972.

Tier One Oil.--All domestically-produced crude oil other than any oil classified in tiers two or three, or explicitly exempted from the tax by the Act. This includes the bulk of domestic oil from reservoirs proven to be productive before 1979.

Tier Two Oil.--Any oil which is from a stripper well property within the meaning of the June 1979 Department of Energy pricing regulations and oil from a U.S: economic interest in a National Petroleum Reserve.

Tier Three Oil, Heavy Oil.--All crude oil which is (1) produced from property which had a weighted average gravity of 16.0 degrees or less on the American Petroleum Institute (API) scale, corrected to 60 degrees Fahrenheit, for the last month of production prior to July 1979 or (2) oil from a property, with a weighted average gravity of 16.0 degrees API or less, corrected to 60 degrees Fahrenheit, for the taxable period.

- Tier Three Oil, Incremental Tertiary Oil.--Production in excess of a base level on a property on which a qualified tertiary recovery project (one which utilizes one of several specific chemical, fluid or gaseous recovery methods to extract oil not recoverable using standard techniques) has been undertaken. The non-incremental oil (i.e., the amount of production up the base level) remains in the otherwise applicable tier.

Tier Three Oil, Newly Discovered Oil.--Crude oil that is sold after May 31, 1979, and that is produced from (1) an outer continental shelf area for which the lease was entered into on or after January 1, 1979, and from which there was no production in Calendar Year 1978 or (2) an on-shore property developed after Calendar Year 1978.

Windfall Profit.--The excess of the removal price of the barrel of oil over the sum of the adjusted base price and the severance tax adjustment.

## REFERENCES

[1] See also Belal, Carol and Clark, Phil, "Windfall Profit Tax Liability for 1980,". SOI Bulletin, Volume 1, No. 2, pages 50-54.
[2] Joint Committee on Taxation (Staff), General Explanation of the Crude Oil Windfall Profit Tax Act of 1980, U.S. Government Printing Office, 1981.
[3] U.S. Department of Commerce, Bureau of Economic Analysis, Survey of Current Business.

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Table 1.--Individual Income Tax Returns: Selected Income and Tax Items for Selected Years, 1970-1980.
[Money amounts are in thousands of dollars]

| I tem | 1970 | 1975 | 1977 | 1978 | 1979 | $\begin{gathered} 1980 \\ \text { (Revised) } \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Number of returns: All returns.... | 74,279,831 | 82,229,332 | 86,634,640 | 89,771,551 | 92,694, 302 | 93,902,469 |
| Joint return | 42,376,365 | 44,140,085 | $44,004,343$ | 44,483,348 | 44,855,141 | 45,243,211 |
| Sources of income: |  |  |  |  |  |  |
| Salaries and wages: Number of returns | 66,965,659 | 73,520,046 | 77,345,927 | 80,278,349 | 83,200,646 | 83,802,109 |
| Amount. | 531,883,892 | 795,399,462 | 969,403,997 | 1,090,291,855 | 1,229,251,389 | 1,349,842,802 |
| Interest received: |  |  |  |  |  |  |
| Number of returns | 32,630,355 | 40,378,240 | 44,005,988. | 46,107,411 | 47,885,069 | 49,019,575 |
| Amount. | 22,021,267 | 43,433,554 | 54,603,049 | 61,222,522 | 73,875,462 | 102,009,444 |
| Taxable pensions and annuities: |  |  |  |  |  |  |
| Number of returns Amount. | $3,249,558$ $7,878,808$ | $5,088,937$ $20,886,871$ | $6,222,199$ $29,211,627$ | $6,373,564$ $32,743,819$ | $6 ; 866,851$ $37,346,510$ | $\begin{array}{r} 7,373,704 \\ 43,339,736 \end{array}$ |
| Dividends (after exclusion): <br> Number of returns. | 7,729,939 | 8,853,491 | 9,202,378 | 9,425,819 | 9,881,105 | 10,738,982 |
| Amount. . . . . . . | 15,806,924 | 21,892,126 | 27,020,483 | 30,206,475 | 33,482,508 | 38,761,253 |
| Net capital gain less loss: |  |  |  |  |  | 8,929,474 |
| Number of returns Amount. | $7,962,663$ $9,006,683$ | $7,574,823$ $14,071,893$ | $8,736,065$ $20,776,604$ | 8,711,086. | $8,641,573$ $28,448,300$ | 89,659,600 |
| Business net income less loss: $\quad$, $\quad$, 0 , |  |  |  |  |  |  |
| Number of returns. | 6,159,985 | 7,242,542 | 7,774,555 | 8,194,375 | 8,562,834 | $8,881,119$ |
| Amount. | 30,554,201 | 39,421,478 | 49,451,961 | 53,546,508 | 56,564,467 | $55,129,154$ |
| Total adjustments: |  |  |  |  |  |  |
| Number of returns | 6,370,552 | 9,024,255 | 9,742,368 | 10,576,955 | 11,543,369 | 13,148,919, |
| Amount | 7,665,251 | 15,101,999 | 19,329,363 | 22,364,088 | 24,778,484 | 28,614,061 |
| .. Individual_Retirement. Arrangement: | - - - | … ... | $\therefore \therefore-\ldots$ | - - . . | - | - $-\ldots$ |
| Number of return | N/A | 1,211,794 | 2,002,833 | 1,925,853 | 2,451,955 | 2,564,421 |
| Amount | N/A | 1,436,443 | 2,457,708 | 2,497,307 | 3,198,788 | 3,430,894 |
| Self-Employed Retirement (Keogh) : |  |  |  |  |  |  |
| Amount. | 847,692 | 1,603,788 | 1,834,734 | 1,804,243 | 2,029,300 | 2,007,666 |
| Adjusted gross income | 631,692,540 | 947,784,873 | 1,158,492,225 | 1,302,447,386 | 1,465,394,530 | 1,613,731,497 |
| Exemptions: |  |  |  |  |  |  |
| Total number | 204,126,402 | 212,202,596 | 215,176,997 | 219,867,696 | 224,691,732 | 227,925,098 |
| ${ }^{+}$Number, age 65 or | 8,904,331 | 9,937,208 | 10,480,724 | 10,996,804 | 11,322,713 | 11,847,168 |
| Total amount..... | 127,531,204 | 159,140,845 | 161,382,748 | 164,900,772 | 223,891,529 | 227,569,280 |
| Total deductions: |  |  |  |  |  |  |
| Number of returns | 73,862,448 | 81,585,541 | 81,856,462 | 85,473,429 | 87,202,857 | 88,491, 251 |
| Amount. | 120,549,755 | 233,181,778 | 276,170,902 | 304,282,120 | 332,957,555 | 346,000,155 |
| Total itemized deductions: |  |  |  |  |  |  |
| Number of return | 35,430,047 | 26,074,061 | 22,896,507 | 25,756,298 | 26,483,877 | 28,950,282 |
| Amount. | 88,178,487 | 122,260,601 | 138,519,421 | 164,432,406 | 184,168,669 | 218,028,139 |
| Medical and dental expens | 10,585,749 | 11,422,312 | 11,006,536 | 12,203,983 | 12,915,626 | 14,972,082 |
| Taxes paid. | 32,014,673 | 44,141,289 | 51,974,887 | 59,506,835 | 60,674,905 | 69,404,275 |
| Interest paid | 23,929,477 | 38,885,282 | 47,825,469 | 60,681,144 | 74,427,045 | 91,187,006 |
| Contributions | 12,892,732 | 15,393,331 | 17,266,462 | 19,691,249 | 22,210,838 | 25,809,608 |
| Taxable income: |  |  |  |  |  |  |
| Number of return | 59,593,598 | 65,852,602 | 81,674,633 | 85,280,660 | 86,932,978 | 88,104,696 |
| Amount | 401,154,285 | 595,492,866 | 938,968,454 | 1,062,190,322 | 1,157,247,646 | 1,279,985,360 |
| Income tax before credits: |  |  |  |  |  |  |
| Number of returns | 59,596,755 | 65,854,734 | 68,694,798 | 73,087,283 | 74,243,824 | 76,135,819 |
| Amount | 82,138,617 | 132,452,044 | 172,111,669 | 203,803,653 | 220,099,516 | 256,294,315 |
| Total tax credits | 369,610 | 8,069,846 | 13,637,761 | 17,085,591 ${ }^{\text {' }}$ | 6,780,186 | - 7,215,839 |
| General tax credit. | N/A | 5,020,477 | 9,524,028 | 10,248,475 | N/A | N/A |
| Credit for the elderly....... | 167,656 | 128,968 | 167,591 | 145,255 | 131,734 | 134,993 |
| Residential energy credit..... | N/A | N/A | N/A | 576,545 | 473,603 | 562,141. |
| Earned income credit. | N/A | 252,141 | 145,581 | 152,934 | 495,500 | 451,366 |
| Income tax after credits | 83,787,323 | 124,382,197 | 158,473,908 | 186,718,062 | 213,319,330 | 249,078,475 |
|  |  |  |  |  |  |  |
| Total income tax: |  |  |  |  |  |  |
| Number of returns | 59,317,371 | 61,490,737 | 64,381,138 | 68,688,305 | 71,694,983 | 73,906,244 |
| Amount. | 83,909,311 | 124,526,297 | 159,796,823 | 188,232,537 | 214,494,519 | 250,341,440 |

N/A - Not applicable.
NOTE: Tax law changes have affected the comparability of the data. See the specific Statistics of Income reports for
a description of those law changes.
SOURCE: Statistics of Income, Individual Income Tax Returns, appropriate years.

Table 2.--Sole Proprietorship Returns: Selected Income and Deduction Items for Selected Years, 1970-1980

| Item | 1970 | 1975 | 1977 | 1978 | 1979 | 1980 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total number of businesses. | 9,399,653 | 10,881,969 | 11,345,616 | 12,017,953 | 12,329,982 | 12,701,597 |
| Number with net income | 6,675,680 | 7,385,833 | 7,748,976 | 8,254,536 | 8,330,818 | 8,215,438 |
| Inventory, end of year | 12,153,615 | 17,164,511 | 19,148,274 | 21,822,890 | 24,074,447 | 24,052,000 |
| Business receipts. | 237,726,748 | 339,221,398 | 393,871,922 | 443,354,851 | 487,807,384 | 505,884,882 |
| Total deductions. | 204,512,011 | 294,610,138 | 342,482,951 | 384,327,565 | 427,048,596 | 450,434,899 |
| Cost of sales and operations. | 133,526,775 | 185,745,453 | 211,918,200 | 218,590,325 | 229,441,138 | 237,154,342 |
| Payroll.... | 25,324,395 | 33,064,066 | 36,395,668 | 40,576,849 | 42,366,149 | 41,985,964 |
| Taxes paid. | 5,229,009 | 7,435,330 | 8,582,206 | 9,362,245 | 9,903,005 | 10,102,834 |
| Interest paid. | 3,818,791 | 7,255,904 | 9,042,180 | 10,869,976 | 13,629,184 | 16,241,787 |
| Depreciation......................... | 10,049,833 | 15,815,144 | 18,299,280 | 21,206,674 | 24,170,602 | 25,796,183 |
| Pension and profit sharing plans... | 75,386 | 131,267 | 141,566 | 129,775 | 140,976 | 146,181 |
| Net income less deficit.............. | 33,214,737 | 44,611,260 | 51,388,971 | 59,027,286 | 60,758,789 | 55,449,987 |
| Net income. | 39,335,180 | 57,272,242 | 66,571,503 | 75,329,052 | 80,277,325 | 80,306,493 |
| Deficit | 6,120,443 | 12,660,982 | 15,182,532 | 16,301,766 | 19,518,536 | 24,856,506 |

NOTE: Tax law changes have affected the comparability of the data. See the specific Statistics of Income reports for a description of those law changes.

SOURCE: Statistics of Income, Sole Proprietorship Returns, appropriate years.

Table 3.-- Partnership Returns: Selected Income Statement and Balance Sheet Items for Selected Years, 1970-1980
[All figures are estimates based on samples--money amounts are in thousands of dollars]

| Item | 1970 | 1975 | 1977 | 1978 | 1979 | 1980 |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | (1) | (2) | (3) | (4) | (5) | (6) |
| Total number of partnerships. | 936,133 | 1,073,094 | 1,153,398 | 1,234,157 | 1,299,593 | 1,379,653 |
| Number with net income | 639,795 | 661,134 | 710,256 | 761,753 | 765,575 | 774,173 |
| Number of partners | 3,697,818 | 4,950,634 | 6,079,860 | 6,121,455 | 6,954,767 | r8,419,899 |
| Total assets | 116,752,751 | 235,468,301 | 296,098,262 | 353,699,180 | 447,130,068 | 597,503,923 |
| Inventory, end of | .a. | 11,985,431 | n.a. | 17,202,990 | n.a. | 33,218,272 |
| Total receipts | 93,348,080 | 148,417,529 | 180,848,961 | 219,192,109 | 258,197,936 | 291,998,115 |
| Business receipt | 90,208,834 | 142,505,781 | 171,424,236 | 207,731,266 | 242,653,710 | 271,108,832 |
| Interest received. | 942,304 | 2,477,173 | 3,102,538 | 4,346,928 | 7,246,203 | 10,869,323 |
| Net gain, noncapital asset | 121,505 | 359,566 | 611,861 | 957,426 | 980,769 | 1,101,630 |
| Total deductions | 83,557,684 | 140,679,959 | 167,584,793 | 204, 745, 300 | 242,992,028 | 283,749,460 |
| Cost of sales and operations | 46,040,874 | 64,672,843 | 75,853,364 | 87,217,203 | 102,096,671 | 113,885,668 |
| Payroll. | 12,276,160 | 17,074,875 | 19,964,455 | 22,252,594 | 26,092,084 | r29,332,070 |
| Taxes paid | 3,159,258 | 5,770,918 | 6,914,357 | 7,364,870 | 8,328,583 | 9,553,145 |
| Interest paid | 4,470,206 | 12,097,100 | 13,455,385 | 16,022,804 | 21,275,551 | 28,362,385 |
| Depreciation. | 4,578,820 | 10,108,834 | 12,334,740 | 14,519,760 | 17,662,667 | 21,576,189 |
| Pension and profit-sharing plans | 84,956 | 190,127 | 251,395 | 260,432 | 311,926 | 384,955 |
| Net income less deficit | 9,790,396 | 7,737,570 | 13,264,168 | 14,446,809 | 15,205,908 | 8,248,655 |
| Net income | 14,419,124 | 22,431,931 | 28,929,500 | 33,689,343 | 40,000,896 | 45,061,756 |
| Deficit | 4,628,728 | 14,694,361 | 15,665,332 | 19,242,534 | 24,794,987 | 36,813,100 |

n.a. - Not available. r - Revised.

NOTE: Tax law changes have affected the comparability of the data. See the specific Statistics of Income reports for a description of those law changes.

SOURCE: Statistics of Income, Partnership Returns, for appropriate years.

Table 4.--Corporation Income Tax Returns: Selected Balance Sheet, Income Statement, and Tax Items for Selected Years, 1970-1980
[All figures are estimates based on samples-money amounts are in thousands of dollars]

| Item | 1970 | 1975 | 1977 | 1978 | 1979 | $\begin{gathered} 1980^{1} \\ \text { (Preliminary) } \end{gathered}$ |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | (1). | (2) | (3) | (4) | (5) | (6) |
| Number of returns: |  |  |  |  |  |  |
| Tot | 1,665,477 | 2,023,647 | 2,241,887 | 2,376,779 | 2,556,794 | 2,713,546 |
| Number with net incom | 1,008,337 | 1,226,208 | 1,424,528 | 1,523,648 | 1,586,485 | 1,598,317 |
| Small Business Corporation returns. | 257,475 | 358,413 | 428,204 | 478,679 | 514,907 | 545,765 |
| Domestic International Sales Corporation returns........ | N/A | 6,431 | 6,665 | 7,208 | 8,066 | 8,660 |
| Total assets | 2,634,706,564 | 4,286,556,273 | 5,326,389, 281 | 6,014,452,008 | '6,835,056,963 | 7,504,550,687 |
| Invento | 190,401, 642 | 317,718,545 | 396,032,639 | $442,652,820$ | 503,033,064 | 524,042,460 |
| Investments in Government obligations. | 196,625,390 | 316,131,699 | - $380,540,830$ | - 403,628,383 | 420,965,658 | - 465,157,858 |
| Net capital assets, except land ${ }^{2}$. | 552,838,384 | 825,107,002 | 1,001,921,728 | 1,115,564,447 | $1,262,831,629$ | $1,396,202,566$ |
| Total liabilities | . $1,882,295,401$ | 3,189,491,468 | 3,975,418,416 | 4,519,695,153 | 5,119,271,892 | 5,590,580,300 |
| Short-term debt ${ }^{3}$ | 170,884,261 | 272,123,551 | 319,805,729 | 380,851,818 | 452,181,682 | 498,606,189 |
| Long-term debt ${ }^{3}$ | 362,700,303 | 586,703,526 | 694,119,251 | 780,536,053 | 884,636,968 | 970,311,292 |
| Net w | 752,411,163 | 1;097,064,806 | 1,350,970,865 | 1,494,756,856 | 1,715,785,070 | 1,913,970,387 |
| Total receipts | 1,750,776,503 | 3,198,627,860 | 4,128, 304,478 | 4,714,602,615 | 5,598,689,129 | 6,291,961,643 |
| Business receipt | 1,620,886,576 | 2,961,729,640 | 3,813,925,121 | $4,353,704,519$ | 5,136,075,461 | 5,673,032,986 |
| Interest on Government obligations. $\qquad$ | 9,687,116 | 17,264,405 | 22,177,902 | 25,381,712 | 30,380,747 | 37,378,617 |
| Other interest.. | 61,883,309 | . 126,034,505 | 154,491,738 | - 195,479,301 | 258,924, 285 | 324,194,471 |
| Rents and royalties | 16,524,889 | 26,932,271 | 38,773,512 | 38,164,761 | 40,302,778 | 52,938,742 |
| Net long-term capital gain reduced by net short-term capital loss. | 5,481,580 | 8,364,523 | 11,916,138 | 14,679,876 | 19,958,447 | 24,539,268 |
| Net gain, noncapital assets | 5,315,562 | - 7,757,287 | 11,169,250 | 12,137,078 | 15,378,796 | 19,674,118 |
| Dividends received from domestic corporations. $\qquad$ | 5,238,421 | 8,818,282 | 13,932,345 | 13,321,287 | 16,824,708 | 18,286,091 |
| Dividends received from foreign corporations......................... | 3,466,515 | 5,467,726 | 8,275,849 | 9,277,932 | 12,713,087 | 14,154,095 |
| Total deductions | 1,682;778,847 | 3,052,674,597 | 3,908,781,721 | 4,467,196,877 | 5,315,725,012 | 6,061,429,015 |
| Cost of sales and o | 1,146,263,273 | 2,129,928,467 | 2,725,009,554 | 3,113,421,507 | 3,709,672,825 | 4,184,452,670 |
| Taxes paid. | 49,523,243 | 81,530,302 | 104,282,166 | 116,155,070 | 127,751,719. | 160,347,683 |
| Interest pai | 62,0555,010 | - 129,307,921 | 152,865,323 | 192,403,316 | 261,277,331 | 339,280,665 |
| Contributions or gis | 797,029 | 1,202,130 | 1,789,747 | 2,084,022 | 2,288,334 | 2,284,771 |
| Depreciation...... | 52,941,266 | 86,295,664 | 106,972,692 | 121,299,900 | 138,061,915 | 153,889,097 |
| Pension, profit-sharing, stock bonus, and annuity plans...... | 12,225,912 | 26,526,129 | 36,463,699 | 41,825,415 | 46,506,098 | 50,637,216 |
| Net income less d | 65,901;614 | 142,636,826 | 219,243,043 | 246,867,473 | 284,615,731 | 233,516,781 |
| Net income | 83,710;,924 | 169,483,336 | 245,274,490 | 274,519,721 | 321,649,761 | 290,914,836 |
| Deficit | 17,809,310 | 26,846,510 | 26,031,447 | 27,652,248 | 37,034,030. | 57,398,054 |
| Income subject to t | 72,374,437 | 146,589,287 | 212,501,782 | 239,631,773 | 279,376,063 | 241,107,676 |
| Income tax before credits ${ }^{4}$. | 32,910,634 | 65,769,822 | 95,627,563 | 106,976,893 | 118,860,300 | 101,300, 526 |
| Tax credits, total | 5,414,940 | 26,452,791 | 39,605,284 | 43,501,607 | 54,159,276 | 41,245,979 |
| Foreign tax credit | 4,548,986 | 19,987,724 | 26,006,028 | 26,357,629 | 36,827,331 | 24,337,823 |
| Investment credit. | 865,954 | 6,459,746 | 11,038,404 | 12,897,172 | 14,634, 672 | 14,714,815 |
| Income tax after credits ${ }^{4}$ | 27,495,694 | 39,317,031 | 56,022,279 | 63,475, 286 | 64,701,024 | 60,054,547 |
| Additional tax for tax preferences.. | 265,249 | -156,740 | - 263,316 | -340,519 | -432,649 | 426,358 |
| Total income tax after credits...... | 27,838,775 | 39,691,517 | 56,735,169 | 64,386,838 | 65,887,759. | 61,334,228 |

[^10]Table 5.--Gross Internal Revenue Collections: Amount Collected by Quarter and Fiscal Year, 1979-82
[Money amounts are in millions of dollars]

| Quarter and fiscal year | Total | Source of revenue |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Individual income taxes ${ }^{1}$ | Corporation income taxes ${ }^{1}$ | Excise taxes ${ }^{2}$ | Employment taxes ${ }^{3}$ | Estate and gift taxes |
| 1979 | (1) | (2) | (3) | (4) | (5) | (6) |
| Total. | 460,412 | 251,546 | 71,448 | 19,050 | 112,850 | 5,519 |
| October 1978 to December 1978.. | 91,796 | 49,563 | 14,745 | 4,983 | 21,154 | 1,351 |
| January 1979 to March 1979.... | 108,284 | 60,070 | 14,124 | 4,468 | 28,237 | 1,385 |
| April 1979 to June 1979........ | 149,817 | 82,684 | 28,304 | 4,731 | 32,775 | 1,323 |
| July 1979 to September 1979.... | 110,515 | 59,228 | 14,275 | 4,868 | 30,684 | 1,460 |
| 1980 |  |  |  |  |  |  |
| Total..................... | 519,375 | 287,548 | 72,380 | 24,619 | 128,330 | 6,498 |
| October 1979 to December 1979.. | 105,947 | 58,899 | 14,894 | 4,902 | 25,755 | 1,497 |
| January 1980 to March 1980..... | 122,422 | 68,723 | 15,074 | 4,250 | 32,850 | 1,524 |
| April 1980 to June 1980......... | 166,827 | 91,480 | 28,360 | 7,335 | 38,036 | 1,617 |
| July 1980 to September 1980.... | 124,179 | 68,447 | 14,051 | 8,132 | 31,689 | 1,861 |
| 1981 |  |  |  |  |  |  |
| Total.................... | 606,799 | 332,850 | 73,733 | 40,420 | 152,886 | 6,910 |
| October 1980 to December 1980.. | 118,804 | 67,081 | 14,527 | 7,305 | 28,193 | 1,698 |
| January 1981 to March 1981..... | 143,899 | 77,467 | 14,844 | 10,082 | 39,878 | 1,628 |
| April 1981 to June 1981........ | 196,970 | 108,600 | 29,204 | 11,963 | 45,510 | 1,692 |
| July 1981 to September 1981.... | 147,126 | 79,702 | 15,158 | 11,069 | 39,304 | 1,893 |
| 1982 |  |  |  |  |  |  |
| Total ${ }^{4}$. | 627,371 | 350,085 | 64,673 | 36,841 | 167,495 | 8,277 |
| October 1981 to December 1981.. | 137,570 | 71,526 | 15,898 | 10,577 | 37,654 | 1,915 |
| January 1982 to March 1982..... | 154,128 | 85,930 | 14,722 | 9,426 | 41,751 | 2,299 |
| April 1982 to June 1982........ | 196,506 | 113,852 | 23,115 | 8,389 | 49,165 | 1,986 |
| July 1982 to September $1982^{4}$... | 139,166 | 78,777 | 10,938 | 8,449 | 38,925 | 2,077 |

[^11]This appendix discusses typical sampling procedures used in most Statistics of Income (SOI) programs. Aspects covered briefly include sampling criteria, selection techniques, methods of estimation, and sampling variability. Some of the nonsampling error limitations of the data are also described, as well as the tabular conventions employed.

Additional information on sample design and data limitations for specific SOI studies can be found in the separate SOI publications (see References). More technical information is available, upon request, from the Statistics of Income Division.

## SAMPLE CRITERIA AND SELECTION OF RETURNS

Statistics compiled for the SOI studies are generally based on stratified probability samples of income tax returns or other forms filed with the Internal Revenue Service (IRS). The statistics do not reflect any changes made by the taxpayer through an amended return or by the IRS as a result of audit. The samples are based on such criteria as: principal business activity; presence or absence of a schedule; State from which filed; size of adjusted gross income (or deficit) or largest of specific income (or loss) items; total assets or size of business and farm receipts.

The probability of a return being designated depends on its sample class or stratum and may range from a fraction of one percent to one hundred percent. Considerations in determining the selection probability for each stratum include the number of returns in the stratum, the diversity of returns in the stratum, and interest in the stratum as a separate subject of study. All this is subject to constraints on the allowable total cost or total sample size for the program.

FOr most SOI studies, returns are computer designated based on the Taxpayer Identification Number (TIN) which is either the Social Security Number (SSN) or Employer Identification Number (EIN). In some cases, the ending digits of each TIN are compared to a set of numbers randomly selected for each sample class. If the TIN ending digits are in the set, then the return is designated for the sample. Otherwise, it is not designated.

Alternatively, a fixed and essentially. random number is associated with each possible TIN. If that random number falls into a range of numbers specified for the return's sample stratum, then it is designated. Otherwise, it is not.

Under either method of selection, the TIN's designated from one year's study are for the most part selected for the next study, so that a large proportion of the new sample are repeaters. This longitudinal character of the sample design improves the estimates of change from one study to the next.

## METHOD OF ESTIMATION

In general, weighting factors are obtained by dividing the computer count of returns filed for a sample stratum by the actual number of returns secured for the sample. These weighting factors are then used to inflate the sample results to total population levels. During sampling, lists of the returns designated are checked against the returns secured for the sample to insure that the sample designated is the same as the sample selected. Special searches are made for returns not initially secured so that any bias from nonresponse is minimal.

For the individual income tax returns sample, weighting factors are computed for each sample class within each Internal Revenue district, even though the district is not used to designate the sample. This is an example of post-stratified estimation and is used to improve the estimates for the States. Usage of post-stratified estimation is being studied for other SOI studies.

## SAMPLING VARIABILITY

The particular sample used in a study is only one of a large number of possible random samples that could have been selected using the same sample design. Estimates derived from the different samples would usually vary. The standard error of the estimate is a measure of the variation among the estimates from all possible samples and is used to measure the precision with which an estimate from a particular sample approximates the average result of the possible samples. The sample estimate and an estimate of its standard error permit the construction of interval estimates with prescribed confidence that this interval includes the actual population value.

In SOI reports the standard error is not directly presented. Instead, the ratio of the standard error to the estimate itself is presented and expressed as a percentage. This ratio is called the coefficient of variation (CV). The user of SOI data may multiply an estimate by its coefficient of variation to recreate the standard error and to construct confidence intervals.

For example, if a sample estimate of 150,000 returns is known to have a coefficient of variation of 0.02 , then the following arithmetic procedure would be followed to construct a $68 \%$ confidence interval estimate:

$$
\begin{aligned}
150,000 & \text { (sample estimate) } \\
\times 0,02 & \text { (coefficient of variation) } \\
=3,000 & \text { (standard error of estimate } \\
150,000 & \text { (sample estimate) } \\
\pm 3,00 & \text { (standard error) } \\
=147,000-153,000 & \text { (68\% confidence interval) }
\end{aligned}
$$

Based on these data, the interval estimate is from 147 to 153 thousand returns. A conclusion that the average estimate of the number of returns lies within an interval computed in this way would be correct for approximately two-thirds of all possible similarly selected samples. To obtain this interval estimate with 95 percent confidence, multiply the standard error by two before adding to and subtracting from the sample estimate. (In this particular case, the resulting interval would be from 144 to 156 thousand returns.)

Further details concerning confidence intervals, including the approximation of CV's for combined sample estimates, may be obtained on request by writing to the Statistics of Income Division, D:R:S, Internal Revenue Service, Washington, D.C. 20224

## NONSAMPLING ERROR ĊONTROLS AND LIMITATIONS

Although the previous discussion focuses on sampling methods and the limitations of the data caused by sampling errors, there are other sources of errors which may be significant in evaluating the usefulness of SOI data. These include taxpayer reporting errors, processing errors, early cut-off of sampling, etc. More extensive information on nonsampling errors is presented in SOI reports, when appropriate.

In transcribing and tabulating the information from the returns or forms selected for the sample, checks are imposed to improve the quality of the resultant éstimatés. Missing entries are imputed during statistical processing by utilizing other information on the return and accompanying schedules. Data may be disaggregated and recombined during editing to achieve consistent statistical definitions. In the future, SOI studies will make use of earlier returns of the same taxpayer to check current data, for instarice the industry code. Also, research on better methods of imputing missing data is being conducted.

Quality of the basic data abstracted at the processing centers is controlled by a continuous sampling verification system. In addition, the Statistics of Income Division in the National Office conducts an independent reprocessing of a small subsample of statistically processed returns as a further check. Prior : to tabulation, numerous computer tests are applied to each return record to check for inconsistencies.

Fịnally; before publication, all statistics are reviewed for accuracy and reasonableness in light of provisions of the tax laws, taxpayer reporting variations and limitations, economic conditions, comparability with other statistical series, and statistical techniques used in data processing and estimating.

## tabular conventions

Estimates of frequencies and money amounts that are considered unreliable, due to the small sample size on which they are based, are noted by an asterisk (*) to the left of the data item(s) in the tabulations. The presence of an asterisk indicates that the sample rate is less than 100 percent of the population and there are fewer than 10 sample observations available for estimation purposes.

A dash in place of a frequency or amount indicates that no sample return had that characteristic. In addition, a dash in place of a coefficient of variation for which there is an estimate indicates that all returns contributing to the estimate were selected at the 100 percent rate.
Whenever a weighted frequency in a data cell is less than 3 , the estimate is either combined with other cells or deleted in order to avoid disclosure of information about individual taxpayers or businesses. These combinations and deletions are indicated by a double asterisk (**).

## REFERENCES

[1] Statistics of Income--1979, Individual Income Tax Returns (see especially pages 163 to 166)
[2] Statistics of Income--1978-79, Corporation Income Tax Returns (see especially pages 11 to 19)
[3] Statistics of Income--1979, Partnership Returns (see especially pages 5 to 7 )
[4] Statistics of Income--1979-80, Sole $\frac{\text { Proprietorship Returns }}{\text { to 8) }}$ (see especially pages 5 to 8)
[5] Statistics of Income--1976-1979, International Income and Taxes, Foreign Income and Taxes Reported on U.S. Tax Returns (in preparation)
[6] Statistics of Income--1973, Sales of Capital Assets Reported on Individual Income Tax Returns (see especially pages 17 to 20)
[7] Statistics of Income--1976; Estate Tax Returns (see especially pages 11 to 12)
[8] Statistics of Income--1974-1978; Private Foundations (see especially pages 9 to 16 )

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[^0]:    *Individual Returns Analysis Section. Prepared under the direction of Noreen Hoffmeier, Acting Chief. Technical assistance provided by June Walters.

[^1]:    NEstimate should be used with caution because of the smat
    Notr: Detail may not add to total because of rounding.

[^2]:    'Less than $\$ 500$

[^3]:    - Estimate should be used with caution because of the small number of sample returns on which it was based.

[^4]:    *Prepared under the direction of Noreen Hoffmeier, Acting Chief, Returns Analysis Section, Individual Statistics Branch.

[^5]:    N/A - Not applicable.
    *This figure is not shown to avoid disclosure of information for specific businesses. However, the data are included in the appropriate totals.
    ${ }^{1}$ Rate per barrel.
    ${ }^{2}$ Number of barrels.
    ${ }^{3}$ Number of businesses reporting at least one of the indicated substances.
    ${ }^{4}$ Less than 1,000 tons.
    NOTE: Detail may not add to total because of rounding.

[^6]:    *Prepared under the direction of Richard Blucher, Chief of the Projections and
    Forecasting Group, Research Division.

[^7]:    *Prepared under the direction of Daniel F. Skelly, Acting Chief, Foreign Special Projects Section, Foreign Statistics Branch.

[^8]:    ${ }^{1}$ Represents 96 percent of all returns tabulated and 95 percent of the liability.
    NOTE: Detail may not add to total because of rounding.

[^9]:    ${ }^{1}$ Represents 88 percent of all returns and 1iability tabulated.
    NOTE: Detail may not add to total because of rounding.

[^10]:    N/A - Not Applicable.
    ${ }^{1}$ The preliminary 1980 data are subject to change and therefore should be used with caution. Final data will be presented in the winter issue.
    ${ }^{2}$ Net capital assets, except land, consisted of depreciable, depletable, and intangible assets less accumulated depreciation, depletion and amortization.
    ${ }^{3}$ Short-term debt is the abbreviated title given to mortgages, notes and. bonds payable in less than 1 year. Long-term debt is the abbreviated title given to mortgages, notes and bonds payable in 1 year or more.
    ${ }^{4}$ Consists of normal tax, surtax, and alternative tax for Tax Years 1970 thru 1978, and regular tax and alternative tax for Tax Years 1979 and 1980.

    NOTE: Tax law changes have affected the comparability of the data. See the appropriate Statistics of Income reports for a description of those law changes.

    SOURCE: Statistics of Income, Corporation Income Tax Returns, appropriate years.

[^11]:    ${ }^{1}$ Consists of amounts paid by individuals or corporations as estimated tax payments or amounts withheld by employers prior to return filing, payments made with the return, and any subsequent payments.
    ${ }^{2}$ Consists of taxes imposed on selected products, services, and activities, such as those on alcohol and tobacco products and the windfall profit tax on domestically produced crude oil.
    ${ }^{3}$ Composed largely of payroll taxes levied on salaries and wages, such as social security, railroad retirement, and unemployment taxes.
    ${ }^{4}$ Collections in September 1982 are estimated.
    NOTE: Detail may not add to total because of rounding.
    SOURCE: Internal Revenue Service, Returns Processing and Accounting Division, Revenue and Accounting Branch.

