

## IRS Data Book Table 18

## Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2019

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>20,040</b>	<b>14,517</b>	<b>5,523</b>	<b>6,658,557</b>	<b>6,608,912</b>	<b>49,645</b>
► Individual income tax returns, total	16,385	10,909	5,476	1,350,658	1,306,792	43,866
► Returns with total positive income under \$200,000 [3]:						
► Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	1,341	621	720	45,119	40,607	4,512
With Schedule E or Form 2106 [5]	2,718	1,619	1,099	120,373	115,401	4,972
► Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	2,265	1,178	1,087	39,422	35,975	3,447
\$25,000 under \$100,000	915	737	178	26,694	26,022	672
\$100,000 under \$200,000	846	780	66	36,351	35,481	870
\$200,000 or more	908	877	31	81,863	81,612	251
Farm returns	113	d	d	3,149	d	d
► Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]						
Under \$25,000	1,809	377	1,432	24,359	17,087	7,272
\$25,000 or more	1,005	902	103	53,629	52,783	846
► Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	1,317	1,027	290	127,285	119,603	7,682
Business returns	1,877	1,523	354	229,889	226,639	3,250
► Returns with total positive income of \$1,000,000 or more [3]	1,258	1,168	90	562,472	552,414	10,058
► International returns [8]	13	d	d	54	d	d
► Corporation income tax returns, except Form 1120-S, total [9]	1,249	1,249	-	4,493,697	4,493,697	N/A
► Returns other than Forms 1120-C and 1120-F [10]:						
► Small corporations	961	961	-	219,909	219,909	N/A
No balance sheet returns	137	137	-	60,701	60,701	N/A
Balance sheet returns by size of total assets:						
Under \$250,000	310	310	-	43,655	43,655	N/A
\$250,000 under \$1,000,000	243	243	-	56,502	56,502	N/A
\$1,000,000 under \$5,000,000	208	208	-	40,659	40,659	N/A
\$5,000,000 under \$10,000,000	63	63	-	18,392	18,392	N/A
► Large corporations	283	283	-	4,204,966	4,204,966	N/A
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	98	98	-	57,369	57,369	N/A
\$50,000,000 under \$100,000,000	30	30	-	16,151	16,151	N/A
\$100,000,000 under \$250,000,000	21	21	-	6,378	6,378	N/A
\$250,000,000 under \$500,000,000	11	11	-	14,427	14,427	N/A
\$500,000,000 under \$1,000,000,000	19	19	-	67,384	67,384	N/A
\$1,000,000,000 under \$5,000,000,000	36	36	-	923,321	923,321	N/A
\$5,000,000,000 under \$20,000,000,000	29	29	-	1,208,069	1,208,069	N/A
\$20,000,000,000 or more	39	39	-	1,911,866	1,911,866	N/A
► Form 1120-C returns [10]	d	d	-	d	d	N/A
► Form 1120-F returns [10]	d	d	-	d	d	N/A
► Estate and trust income tax returns [11]	69	d	d	28,856	d	d
► Estate tax returns, total [12]	71	71	-	162,363	162,363	N/A
► Size of gross estate:						
Under \$5,000,000	15	15	-	23,530	23,530	N/A
\$5,000,000 under \$10,000,000	20	20	-	19,513	19,513	N/A
\$10,000,000 or more	36	36	-	119,320	119,320	N/A
► Gift tax returns	118	118	-	238,958	238,958	N/A
► Employment tax returns	1,627	1,627	-	242,932	242,932	N/A
► Excise tax returns	514	514	-	133,646	133,646	N/A
► Other taxable returns [13]	7	d	d	7,447	d	d

d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

N/A—Not applicable.

[1] Excludes excise tax returns filed with U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds, and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2 and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and thus excludes losses.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-C (income tax return for cooperative associations); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "Other taxable returns" described in footnote 13.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes taxable Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native Settlement Trusts).

[12] Includes Form 706 (estate and generation-skipping transfer tax return).

[13] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 1065-B for partnerships reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (return of withholding tax on foreign partner's share of effectively connected income).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations closed in Fiscal Year (FY) 2019 in which the taxpayer did not agree with the IRS examiner's determination. When this occurs, the taxpayer may appeal the decision. For information on all FY 2019 examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation, and other nontaxable returns, see Table 17b.

SOURCE: Small Business/Self-Employed, Examination, Performance Planning and Analysis Examination, Small Business Exam Data Management.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2018**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>22,257</b>	<b>15,878</b>	<b>6,379</b>	<b>10,188,003</b>	<b>10,078,187</b>	<b>109,816</b>
► Individual income tax returns, total	18,687	12,324	6,363	1,986,024	1,876,229	109,796
► Returns with total positive income under \$200,000 [3]:						
► Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	1,523	676	847	82,389	68,760	13,629
With Schedule E or Form 2106 [5]	2,940	1,745	1,195	92,903	85,760	7,143
► Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	2,792	1,555	1,237	33,857	26,387	7,470
\$25,000 under \$100,000	1,401	1,211	190	107,630	104,889	2,741
\$100,000 under \$200,000	930	863	67	84,805	83,292	1,513
\$200,000 or more	1,006	975	31	92,967	90,806	2,161
Farm returns	112	89	23	2,616	2,507	109
► Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,421	488	1,933	33,916	13,929	19,987
\$25,000 or more	1,204	1,085	119	63,146	61,107	2,038
► Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	1,344	1,032	312	152,409	140,785	11,624
Business returns	1,731	1,438	293	171,590	150,582	21,009
► Returns with total positive income of \$1,000,000 or more [3]	1,268	1,152	116	1,067,695	1,047,324	20,371
► International returns [8]	15	15	-	102	102	N/A
► Corporation income tax returns, except Form 1120-S, total [9]	1,229	d	d	6,677,536	d	d
► Returns other than Forms 1120-C and 1120-F [10]:						
► Small corporations	846	d	d	222,792	d	d
No balance sheet returns	127	127	-	23,195	23,195	N/A
Balance sheet returns by size of total assets:						
Under \$250,000	242	d	d	106,659	d	d
\$250,000 under \$1,000,000	213	213	-	32,307	32,307	N/A
\$1,000,000 under \$5,000,000	209	209	-	49,639	49,639	N/A
\$5,000,000 under \$10,000,000	55	55	-	10,992	10,992	N/A
► Large corporations	362	362	-	6,405,495	6,405,495	N/A
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	122	122	-	48,677	48,677	N/A
\$50,000,000 under \$100,000,000	37	37	-	20,307	20,307	N/A
\$100,000,000 under \$250,000,000	37	37	-	55,507	55,507	N/A
\$250,000,000 under \$500,000,000	37	37	-	91,704	91,704	N/A
\$500,000,000 under \$1,000,000,000	18	18	-	28,024	28,024	N/A
\$1,000,000,000 under \$5,000,000,000	41	41	-	703,731	703,731	N/A
\$5,000,000,000 under \$20,000,000,000	45	45	-	740,043	740,043	N/A
\$20,000,000,000 or more	25	25	-	4,717,502	4,717,502	N/A
► Form 1120-C returns [10]	d	d	-	d	d	N/A
► Form 1120-F returns [10]	d	d	-	d	d	N/A
► Estate and trust income tax returns [11]	45	31	14	2,015	2,015	-
► Estate tax returns, total [12]	83	83	-	1,046,415	1,046,415	N/A
► Size of gross estate:						
Under \$5,000,000	12	12	-	183,209	183,209	N/A
\$5,000,000 under \$10,000,000	20	20	-	29,512	29,512	N/A
\$10,000,000 or more	51	51	-	833,694	833,694	N/A
► Gift tax returns	211	211	-	305,454	305,454	N/A
► Employment tax returns	1,483	1,483	-	115,824	115,824	N/A
► Excise tax returns	514	514	-	53,589	53,589	N/A
► Other taxable returns [13]	5	d	d	1,144	d	d

d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

N/A—Not applicable.

[1] Excludes excise tax returns filed with U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds; and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2 and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and thus excludes losses.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-C (income tax return for cooperative associations); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "Other taxable returns" described in footnote 13.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes taxable Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native Settlement Trusts).

[12] Includes Form 706 (estate and generation-skipping transfer tax return).

[13] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 1065-B for partnerships reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (return of withholding tax on foreign partner's share of effectively connected income).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. When this occurs, the taxpayer may appeal the decision. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation, and other nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Performance Planning and Analysis Examination, Small Business Exam Data Management.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2017**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>24,087</b>	<b>17,824</b>	<b>6,263</b>	<b>11,461,968</b>	<b>11,367,494</b>	<b>94,474</b>
► Individual income tax returns, total	19,506	13,247	6,259	1,746,468	1,651,994	94,474
► Returns with total positive income under \$200,000 [3]:						
► Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	1,760	830	930	58,341	51,269	7,072
With Schedule E or Form 2106 [5]	2,878	1,963	915	159,761	154,999	4,762
► Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	2,828	1,693	1,135	46,911	42,174	4,737
\$25,000 under \$100,000	1,732	1,532	200	210,895	208,244	2,651
\$100,000 under \$200,000	963	909	54	44,016	43,347	669
\$200,000 or more	905	880	25	71,269	71,093	176
Farm returns	165	d	d	3,675	d	d
► Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,498	627	1,871	38,413	14,822	23,591
\$25,000 or more	1,150	1,002	148	53,554	51,932	1,622
► Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	1,475	1,127	348	135,054	120,514	14,540
Business returns	1,896	1,459	437	166,246	157,473	8,773
► Returns with total positive income of \$1,000,000 or more [3]	1,239	1,070	169	758,221	732,439	25,782
► International returns [8]	17	d	d	112	d	d
► Corporation income tax returns, except Form 1120-S, total [9]	1,418	d	d	8,784,896	d	d
► Returns other than Forms 1120-C and 1120-F [10]:						
► Small corporations	983	d	d	241,559	d	d
No balance sheet returns	197	d	d	42,946	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	302	302	-	36,896	36,896	-
\$250,000 under \$1,000,000	205	205	-	51,555	51,555	-
\$1,000,000 under \$5,000,000	210	210	-	41,918	41,918	-
\$5,000,000 under \$10,000,000	69	69	-	68,244	68,244	-
► Large corporations	406	406	-	8,512,356	8,512,356	-
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	104	104	-	63,005	63,005	-
\$50,000,000 under \$100,000,000	42	42	-	31,121	31,121	-
\$100,000,000 under \$250,000,000	33	33	-	31,270	31,270	-
\$250,000,000 under \$500,000,000	18	18	-	51,013	51,013	-
\$500,000,000 under \$1,000,000,000	20	20	-	234,565	234,565	-
\$1,000,000,000 under \$5,000,000,000	75	75	-	1,208,791	1,208,791	-
\$5,000,000,000 under \$20,000,000,000	71	71	-	2,807,082	2,807,082	-
\$20,000,000,000 or more	43	43	-	4,085,509	4,085,509	-
► Form 1120-C returns [10]	17	17	-	23,269	23,269	-
► Form 1120-F returns [10]	12	12	-	7,712	7,712	-
► Estate and trust income tax returns [11]	49	d	d	26,187	d	d
► Estate tax returns, total [12]	78	78	-	421,134	421,134	-
► Size of gross estate:						
Under \$5,000,000	10	10	-	7,233	7,233	-
\$5,000,000 under \$10,000,000	23	23	-	34,811	34,811	-
\$10,000,000 or more	45	45	-	379,090	379,090	-
► Gift tax returns	125	125	-	300,923	300,923	-
► Employment tax returns	2,341	2,341	-	159,783	159,783	-
► Excise tax returns	528	528	-	4,166	4,166	-
► Other taxable returns [13]	42	42	-	18,411	18,411	-

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

[1] Excludes excise tax returns filed with U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds; and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2 and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and thus excludes losses.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-C (income tax return for cooperative associations); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "Other taxable returns" described in footnote 13.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes taxable Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native Settlement Trusts).

[12] Includes Form 706 (estate and generation-skipping transfer tax return).

[13] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 1065-B for partnerships reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (return of withholding tax on foreign partner's share of effectively connected income).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. When this occurs, the taxpayer may appeal the decision. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation, and other nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Performance Planning and Analysis Examination, Small Business Exam Data Management.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2016**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>29,005</b>	<b>21,877</b>	<b>7,128</b>	<b>12,195,757</b>	<b>12,066,036</b>	<b>129,721</b>
▶ Individual income tax returns, total	23,602	16,498	7,104	1,695,233	1,568,707	126,526
▶ Returns with total positive income under \$200,000 [3]:						
▶ Nonbusiness returns without Earned Income Tax Credit: Without Schedules C, E, F, or Form 2106 [4]	2,078	1,039	1,039	58,911	52,658	6,253
With Schedule E or Form 2106 [5]	4,066	3,124	942	144,568	141,157	3,411
▶ Business returns without Earned Income Tax Credit: Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	3,275	2,287	988	62,039	57,774	4,265
\$25,000 under \$100,000	1,964	1,665	299	46,860	44,417	2,443
\$100,000 under \$200,000	1,136	1,075	61	56,145	54,770	1,375
\$200,000 or more	1,025	982	43	81,882	81,007	875
Farm returns	218	d	d	7,576	d	d
▶ Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,880	762	2,118	31,758	20,693	11,065
\$25,000 or more	1,031	871	160	46,570	45,331	1,239
▶ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	1,794	1,403	391	139,591	124,263	15,328
Business returns	2,719	1,876	843	204,420	195,228	9,192
▶ Returns with total positive income of \$1,000,000 or more [3]	1,403	1,229	174	814,837	745,683	69,154
▶ International returns [8]	13	d	d	76	d	d
▶ Corporation income tax returns, except Form 1120-S, total [9]	1,776	1,756	20	9,350,566	9,348,221	2,345
▶ Returns other than Forms 1120-C and 1120-F [10]:						
▶ Small corporations [11]	1,288	d	d	236,833	d	d
No balance sheet returns	233	d	d	69,806	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	500	485	15	45,724	43,967	1,757
\$250,000 under \$1,000,000	272	d	d	56,489	d	d
\$1,000,000 under \$5,000,000	208	d	d	47,229	d	d
\$5,000,000 under \$10,000,000	75	75	-	17,585	17,585	-
▶ Large corporations [12]	463	d	d	8,974,442	d	d
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	122	d	d	89,449	d	d
\$50,000,000 under \$100,000,000	51	51	-	61,783	61,783	-
\$100,000,000 under \$250,000,000	44	44	-	119,697	119,697	-
\$250,000,000 under \$500,000,000	26	26	-	52,379	52,379	-
\$500,000,000 under \$1,000,000,000	13	13	-	58,988	58,988	-
\$1,000,000,000 under \$5,000,000,000	71	71	-	1,060,154	1,060,154	-
\$5,000,000,000 under \$20,000,000,000	73	73	-	1,613,432	1,613,432	-
\$20,000,000,000 or more	63	63	-	5,918,560	5,918,560	-
▶ Form 1120-C returns [10]	7	7	-	2,574	2,574	-
▶ Form 1120-F returns [10]	18	18	-	136,717	136,717	-
▶ Estate and trust income tax returns [13]	50	46	4	145,991	145,141	850
▶ Estate tax returns, total [14]	93	93	-	382,095	382,095	-
▶ Size of gross estate:						
Under \$5,000,000	14	14	-	31,174	31,174	-
\$5,000,000 under \$10,000,000	30	30	-	110,217	110,217	-
\$10,000,000 or more	49	49	-	240,704	240,704	-
▶ Gift tax returns	130	130	-	235,127	235,127	-
▶ Employment tax returns	2,701	2,701	-	309,223	309,223	-
▶ Excise tax returns	648	648	-	74,709	74,709	-
▶ Other taxable returns [15]	5	5	-	2,813	2,813	-

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

[1] Excludes excise tax returns filed with U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds; and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2 and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and thus excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-C (income tax return for cooperative associations); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "Other taxable returns" described in footnote 15.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes returns with assets of less than \$10 million.

[12] Includes returns with assets of \$10 million or more.

[13] Includes taxable Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native Settlement Trusts).

[14] Includes Form 706 (estate and generation-skipping transfer tax return).

[15] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (return of withholding tax on foreign partner's share of effectively connected income).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation, and other nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Performance Planning and Analysis Examination, Small Business Exam Data Management.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2015**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>27,820</b>	<b>20,505</b>	<b>7,315</b>	<b>7,442,486</b>	<b>7,265,002</b>	<b>177,484</b>
▶ Individual income tax returns, total	23,323	16,038	7,285	1,661,693	1,488,936	172,757
▶ Returns with total positive income under \$200,000 [3]:						
▶ Nonbusiness returns without Earned Income Tax Credit: Without Schedules C, E, F, or Form 2106 [4]	2,718	1,050	1,668	49,991	41,290	8,701
With Schedule E or Form 2106 [5]	3,650	2,726	924	122,199	118,383	3,816
▶ Business returns without Earned Income Tax Credit: Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	3,210	2,581	629	51,248	47,298	3,950
\$25,000 under \$100,000	2,029	1,782	247	51,981	49,986	1,995
\$100,000 under \$200,000	1,052	996	56	41,828	40,836	992
\$200,000 or more	1,024	993	31	132,662	130,937	1,725
Farm returns	212	d	d	5,739	d	d
▶ Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,789	787	2,002	28,137	18,502	9,635
\$25,000 or more	1,048	965	83	45,833	45,402	431
▶ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	2,122	1,247	875	227,092	121,373	105,719
Business returns	2,100	1,588	512	135,376	127,301	8,075
▶ Returns with total positive income of \$1,000,000 or more [3]	1,351	1,110	241	767,880	740,245	27,635
▶ International returns [8]	18	d	d	1,727	d	d
▶ Corporation income tax returns, except Form 1120-S, total [9]	1,674	1,654	20	4,805,096	4,802,038	3,058
▶ Returns other than Forms 1120-C and 1120-F [10]:						
▶ Small corporations [11]	1,188	1,168	20	144,728	141,670	3,058
No balance sheet returns	197	197	-	23,735	23,735	-
Balance sheet returns by size of total assets:						
Under \$250,000	490	475	15	38,421	36,768	1,653
\$250,000 under \$1,000,000	276	d	d	31,943	d	d
\$1,000,000 under \$5,000,000	164	d	d	22,410	d	d
\$5,000,000 under \$10,000,000	61	61	-	28,219	28,219	-
▶ Large corporations [12]	446	446	-	4,553,819	4,553,819	-
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	93	93	-	87,626	87,626	-
\$50,000,000 under \$100,000,000	35	35	-	96,611	96,611	-
\$100,000,000 under \$250,000,000	45	45	-	58,298	58,298	-
\$250,000,000 under \$500,000,000	34	34	-	107,184	107,184	-
\$500,000,000 under \$1,000,000,000	25	25	-	199,691	199,691	-
\$1,000,000,000 under \$5,000,000,000	88	88	-	1,317,134	1,317,134	-
\$5,000,000,000 under \$20,000,000,000	58	58	-	768,704	768,704	-
\$20,000,000,000 or more	68	68	-	1,918,571	1,918,571	-
▶ Form 1120-C returns [10]	7	7	-	15,258	15,258	-
▶ Form 1120-F returns [10]	33	33	-	91,291	91,291	-
▶ Estate and trust income tax returns [13]	69	59	10	24,168	22,499	1,669
▶ Estate tax returns, total [14]	70	70	-	113,625	113,625	-
▶ Size of gross estate:						
Under \$5,000,000	14	14	-	15,974	15,974	-
\$5,000,000 under \$10,000,000	19	19	-	12,053	12,053	-
\$10,000,000 or more	37	37	-	85,598	85,598	-
▶ Gift tax returns	135	135	-	126,846	126,846	-
▶ Employment tax returns	2,226	2,226	-	555,756	555,756	-
▶ Excise tax returns	310	310	-	87,914	87,914	-
▶ Other taxable returns [15]	13	13	-	67,388	67,388	-

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

[1] Excludes excise tax returns filed with the U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds; and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2, and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-C (income tax return for cooperative associations); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "other taxable returns" described in footnote 15.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes returns with assets of less than \$10 million.

[12] Includes returns with assets of \$10 million or more.

[13] Includes Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native Settlement Trusts).

[14] Includes Form 706 (estate and generation-skipping transfer tax return).

[15] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (return of withholding tax on foreign partner's share of effectively-connected income).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation and other nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Performance Planning and Analysis Examination, Field Exam Workload Planning and Analysis.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2014**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>32,924</b>	<b>25,736</b>	<b>7,188</b>	<b>14,087,005</b>	<b>13,967,960</b>	<b>119,045</b>
▶ Individual income tax returns, total	27,249	20,082	7,167	1,903,591	1,785,792	117,799
▶ Returns with total positive income under \$200,000 [3]:						
▶ Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	3,227	1,530	1,697	65,834	55,686	10,148
With Schedule E or Form 2106 [5]	4,281	2,781	1,500	123,485	118,467	5,018
▶ Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	4,195	3,332	863	66,076	62,076	4,000
\$25,000 under \$100,000	2,376	2,209	167	50,064	48,435	1,629
\$100,000 under \$200,000	1,350	1,317	33	92,732	92,080	652
\$200,000 or more	1,298	1,285	13	125,515	125,231	284
Farm returns	270	250	20	6,999	6,916	83
▶ Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,394	962	1,432	18,179	12,662	5,517
\$25,000 or more	1,233	1,158	75	52,806	52,217	589
▶ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	2,502	1,712	790	198,376	180,282	18,094
Business returns	2,472	2,124	348	197,609	191,637	5,972
▶ Returns with total positive income of \$1,000,000 or more [3]	1,633	1,407	226	824,707	758,894	65,813
▶ International returns [8]	18	15	3	81,209	81,209	[9]
▶ Corporation income tax returns, except Form 1120-S, total [10]	2,024	d	d	10,329,809	d	d
▶ Returns other than Forms 1120-C and 1120-F [11]:						
▶ Small corporations [12]	1,409	d	d	246,497	d	d
No balance sheet returns	232	d	d	35,681	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	600	593	7	37,437	37,089	348
\$250,000 under \$1,000,000	349	d	d	110,604	d	d
\$1,000,000 under \$5,000,000	173	173	-	41,839	41,839	-
\$5,000,000 under \$10,000,000	55	55	-	20,936	20,936	-
▶ Large corporations [13]	595	d	d	9,842,022	d	d
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	103	103	-	708,026	708,026	-
\$50,000,000 under \$100,000,000	50	50	-	34,877	34,877	-
\$100,000,000 under \$250,000,000	70	d	d	74,713	d	d
\$250,000,000 under \$500,000,000	53	53	-	301,428	301,428	-
\$500,000,000 under \$1,000,000,000	43	43	-	284,756	284,756	-
\$1,000,000,000 under \$5,000,000,000	99	99	-	773,892	773,892	-
\$5,000,000,000 under \$20,000,000,000	79	79	-	2,591,227	2,591,227	-
\$20,000,000,000 or more	98	98	-	5,073,103	5,073,103	-
▶ Form 1120-C returns [11]	7	7	-	2,017	2,017	-
▶ Form 1120-F returns [11]	13	13	-	239,273	239,273	-
▶ Estate and trust income tax returns [14]	36	26	10	8,303	7,774	529
▶ Estate tax returns, total [15]	100	100	-	308,209	308,209	-
▶ Size of gross estate:						
Under \$5,000,000	25	25	-	20,472	20,472	-
\$5,000,000 under \$10,000,000	45	45	-	115,118	115,118	-
\$10,000,000 or more	30	30	-	172,619	172,619	-
▶ Gift tax returns	284	284	-	518,453	518,453	-
▶ Employment tax returns	2,775	2,775	-	515,488	515,488	-
▶ Excise tax returns	445	445	-	496,066	496,066	-
▶ Other taxable returns [16]	11	d	d	7,086	d	d

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

[1] Excludes excise tax returns filed with the U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds; and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2, and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Less than \$500.

[10] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-C (income tax return for cooperative associations); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life

[11] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[12] Includes returns with assets of less than \$10 million.

[13] Includes returns with assets of \$10 million or more.

[14] Includes Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native Settlement Trusts).

[15] Includes Form 706 (estate and generation-skipping transfer tax return).

[16] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (return of withholding tax on foreign partner's share of effectively-connected income).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation and other nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Performance Planning and Analysis Examination, Field Exam Workload Planning and Analysis.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2013**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>38,804</b>	<b>31,622</b>	<b>7,182</b>	<b>16,835,600</b>	<b>16,693,090</b>	<b>142,510</b>
▶ Individual income tax returns, total	31,763	24,595	7,168	2,022,352	1,880,927	141,425
▶ Returns with total positive income under \$200,000 [3]:						
▶ Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	3,599	2,032	1,567	85,464	71,360	14,104
With Schedule E or Form 2106 [5]	4,982	3,544	1,438	126,761	121,726	5,035
▶ Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	4,216	3,335	881	71,427	63,297	8,130
\$25,000 under \$100,000	3,250	3,069	181	69,357	68,105	1,252
\$100,000 under \$200,000	1,683	1,621	62	83,480	82,519	961
\$200,000 or more	1,639	1,602	37	124,286	123,934	352
Farm returns	250	237	13	4,463	4,395	68
▶ Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,720	1,095	1,625	34,885	20,869	14,016
\$25,000 or more	1,488	1,410	78	56,227	55,923	304
▶ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	2,838	2,131	707	258,862	215,724	43,138
Business returns	3,062	2,734	328	246,958	241,257	5,701
▶ Returns with total positive income of \$1,000,000 or more [3]	2,014	d	d	839,687	d	d
▶ International returns [8]	22	d	d	20,495	d	d
▶ Corporation income tax returns, except Form 1120-S, total [9]	2,272	d	d	9,763,973	d	d
▶ Returns other than Forms 1120-C and 1120-F [10]:						
▶ Small corporations [11]	1,507	d	d	293,790	d	d
No balance sheet returns	288	288	-	78,328	78,328	-
Balance sheet returns by size of total assets:						
Under \$250,000	568	568	-	45,427	45,427	-
\$250,000 under \$1,000,000	365	365	-	40,556	40,556	-
\$1,000,000 under \$5,000,000	229	d	d	113,478	d	d
\$5,000,000 under \$10,000,000	57	d	d	16,001	d	d
▶ Large corporations [12]	707	d	d	9,115,375	d	d
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	171	d	d	136,659	d	d
\$50,000,000 under \$100,000,000	77	d	d	78,191	d	d
\$100,000,000 under \$250,000,000	71	71	-	117,014	117,014	-
\$250,000,000 under \$500,000,000	35	35	-	93,430	93,430	-
\$500,000,000 under \$1,000,000,000	62	62	-	95,458	95,458	-
\$1,000,000,000 under \$5,000,000,000	143	143	-	1,332,648	1,332,648	-
\$5,000,000,000 under \$20,000,000,000	72	72	-	1,190,346	1,190,346	-
\$20,000,000,000 or more	76	76	-	6,071,629	6,071,629	-
▶ Form 1120-C returns [10]	d	d	-	d	d	-
▶ Form 1120-F returns [10]	d	d	-	d	d	-
▶ Estate and trust income tax returns [13]	98	86	12	120,689	119,604	1,085
▶ Estate tax returns, total [14]	158	158	-	2,954,791	2,954,791	-
▶ Size of gross estate:						
Under \$5,000,000	52	52	-	50,383	50,383	-
\$5,000,000 under \$10,000,000	42	42	-	73,477	73,477	-
\$10,000,000 or more	64	64	-	2,830,931	2,830,931	-
▶ Gift tax returns	264	264	-	1,124,567	1,124,567	-
▶ Employment tax returns	2,932	2,932	-	338,711	338,711	-
▶ Excise tax returns	1,311	1,311	-	500,114	500,114	-
▶ Other taxable returns [15]	6	d	d	10,403	d	d

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the aggregate totals when possible.

[1] Excludes excise tax returns filed with the U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations, Government entities, employee retirement benefit plans, and tax-exempt bonds; and excludes information returns (e.g., Forms 1098, 1099, 5498, W-2, and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-A (corporation income tax return, short form); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "other taxable returns" described in footnote 15.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes returns with assets of less than \$10 million.

[12] Includes returns with assets of \$10 million or more.

[13] Includes Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native settlement trusts).

[14] Includes Form 706 (estate and generation-skipping transfer tax return).

[15] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (partnership withholding tax return).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Workload Planning and Analysis.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2012**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>47,075</b>	<b>38,915</b>	<b>8,160</b>	<b>18,654,923</b>	<b>18,355,134</b>	<b>299,789</b>
▶ Individual income tax returns, total	37,858	29,724	8,134	2,355,985	2,058,705	297,280
▶ Returns with total positive income under \$200,000 [3]:						
▶ Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	4,066	2,246	1,820	102,907	74,983	27,924
With Schedule E or Form 2106 [5]	5,902	4,213	1,689	193,876	186,974	6,902
▶ Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	5,301	4,196	1,105	93,061	87,456	5,605
\$25,000 under \$100,000	4,304	4,099	205	78,573	76,918	1,655
\$100,000 under \$200,000	2,387	2,334	53	79,936	79,272	664
\$200,000 or more	2,057	2,029	28	143,875	143,774	101
Farm returns	246	212	34	2,904	2,775	129
▶ Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,520	1,061	1,459	37,708	31,216	6,492
\$25,000 or more	1,906	1,821	85	71,562	71,304	258
▶ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	3,258	2,497	761	232,223	210,599	21,624
Business returns	3,571	3,042	529	209,854	202,487	7,367
▶ Returns with total positive income of \$1,000,000 or more [3]	2,318	1,952	366	1,097,775	879,216	218,559
▶ International returns [8]	22	22	-	11,731	11,731	-
▶ Corporation income tax returns, except Form 1120-S, total [9]	2,751	2,748	3	14,662,144	14,662,112	32
▶ Returns other than Forms 1120-C and 1120-F [10]:						
▶ Small corporations [11]	1,760	1,757	3	211,096	211,064	32
No balance sheet returns	253	d	d	20,896	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	715	d	d	49,616	d	d
\$250,000 under \$1,000,000	418	418	-	51,784	51,784	-
\$1,000,000 under \$5,000,000	304	d	d	70,035	d	d
\$5,000,000 under \$10,000,000	70	70	-	18,765	18,765	-
▶ Large corporations [12]	942	942	-	12,055,960	12,055,960	-
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	227	227	-	238,863	238,863	-
\$50,000,000 under \$100,000,000	74	74	-	51,219	51,219	-
\$100,000,000 under \$250,000,000	100	100	-	115,233	115,233	-
\$250,000,000 under \$500,000,000	72	72	-	295,704	295,704	-
\$500,000,000 under \$1,000,000,000	65	65	-	97,010	97,010	-
\$1,000,000,000 under \$5,000,000,000	171	171	-	1,880,569	1,880,569	-
\$5,000,000,000 under \$20,000,000,000	92	92	-	2,024,545	2,024,545	-
\$20,000,000,000 or more	141	141	-	7,352,817	7,352,817	-
▶ Form 1120-C returns [10]	8	8	-	12,326	12,326	-
▶ Form 1120-F returns [10]	41	41	-	2,382,762	2,382,762	-
▶ Estate and trust income tax returns [13]	87	d	d	12,332	d	d
▶ Estate tax returns, total [14]	205	205	-	667,772	667,772	-
▶ Size of gross estate:						
Under \$5,000,000	72	72	-	51,710	51,710	-
\$5,000,000 under \$10,000,000	62	62	-	47,622	47,622	-
\$10,000,000 or more	71	71	-	568,440	568,440	-
▶ Gift tax returns	237	237	-	276,888	276,888	-
▶ Employment tax returns	4,038	4,038	-	495,777	495,777	-
▶ Excise tax returns	1,873	1,873	-	120,679	120,679	-
▶ Other taxable returns [15]	26	d	d	63,346	d	d

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals when possible.

[1] Excludes excise tax returns filed with the U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau. Also excludes returns of tax-exempt organizations; Government entities; employee retirement benefit plans; and tax-exempt bond returns; and information returns (e.g., Forms 1098, 1099, 5498, W-2, and W-2G, and Schedule K-1).

[2] Field examinations are generally performed in person by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-A (corporation income tax return, short form); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "other taxable returns" described in footnote 15.

[10] Forms 1120-C are filed by cooperative associations. Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes returns with assets of less than \$10 million.

[12] Includes returns with assets of \$10 million or more.

[13] Includes Form 1041 (income tax return for estates and trusts) and Form 1041-N (income tax return for electing Alaska Native settlement trusts).

[14] Includes Form 706 (estate and generation-skipping transfer tax return).

[15] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (partnership withholding tax return).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, along with partnership, S corporation and other nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Workload Planning and Analysis.



**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2011**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>45,862</b>	<b>37,336</b>	<b>8,526</b>	<b>23,488,542</b>	<b>23,240,131</b>	<b>248,411</b>
► Individual income tax returns, total	37,643	29,165	8,478	2,439,728	2,193,208	246,520
► Returns with total positive income under \$200,000 [3]:						
► Nonbusiness returns without Earned Income Tax Credit: Without Schedules C, E, F, or Form 2106 [4]	4,529	2,369	2,160	104,067	86,034	18,033
With Schedule E or Form 2106 [5]	5,057	3,886	1,171	149,270	143,387	5,883
► Business returns without Earned Income Tax Credit: Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	5,256	4,353	903	80,033	75,621	4,412
\$25,000 under \$100,000	4,553	4,291	262	87,267	85,162	2,105
\$100,000 under \$200,000	2,664	2,580	84	80,648	79,558	1,090
\$200,000 or more	2,108	2,074	34	134,549	134,158	391
Farm returns	250	185	65	4,765	4,652	113
► Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	2,516	916	1,600	20,123	13,703	6,420
\$25,000 or more	1,796	1,712	84	68,659	68,378	281
► Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	3,384	2,292	1,092	237,208	208,931	28,277
Business returns	3,262	2,715	547	246,067	239,319	6,748
► Returns with total positive income of \$1,000,000 or more [3]	2,232	1,756	476	1,223,738	1,050,971	172,767
► International returns [8]	36	36	-	3,334	3,334	-
► Corporation income tax returns, except Form 1120-S, total [9]	2,683	2,661	22	19,455,351	19,454,993	358
► Returns other than Forms 1120-C and 1120-F [10]:						
► Small corporations [11]	1,602	1,584	18	202,652	202,471	181
No balance sheet returns	173	167	6	64,148	64,078	70
Balance sheet returns by size of total assets:						
Under \$250,000	728	716	12	49,018	48,907	111
\$250,000 under \$1,000,000	391	391	-	26,763	26,763	-
\$1,000,000 under \$5,000,000	251	251	-	51,886	51,886	-
\$5,000,000 under \$10,000,000	59	59	-	10,837	10,837	-
► Large corporations [12]	1,027	1,023	4	19,100,045	19,099,868	177
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	292	292	-	218,149	218,149	-
\$50,000,000 under \$100,000,000	76	76	-	168,345	168,345	-
\$100,000,000 under \$250,000,000	71	d	d	104,342	d	d
\$250,000,000 under \$500,000,000	59	59	-	82,760	82,760	-
\$500,000,000 under \$1,000,000,000	45	45	-	175,029	175,029	-
\$1,000,000,000 under \$5,000,000,000	171	171	-	2,087,014	2,087,014	-
\$5,000,000,000 under \$20,000,000,000	160	d	d	5,232,715	d	d
\$20,000,000,000 or more	153	153	-	11,031,691	11,031,691	-
► Form 1120-C returns [10]	33	33	-	-	-	-
► Form 1120-F returns [10]	21	21	-	152,654	152,654	-
► Estate and trust income tax returns	148	131	17	29,768	28,517	1,251
► Estate tax returns, total	240	240	-	524,030	524,030	-
► Size of gross estate:						
Under \$5,000,000	106	106	-	127,070	127,070	-
\$5,000,000 under \$10,000,000	70	70	-	83,327	83,327	-
\$10,000,000 or more	64	64	-	313,633	313,633	-
► Gift tax returns	235	235	-	226,670	226,670	-
► Employment tax returns	3,595	3,595	-	281,076	281,076	-
► Excise tax returns	1,279	1,279	-	473,784	473,784	-
► Other taxable returns [13]	39	30	9	58,135	57,853	282

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Excludes excise tax returns filed with the U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee retirement plans.

[2] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners in person. However, some field examinations may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses) but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-A (corporation income tax return, short form); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "other taxable returns" described in footnote 13.

[10] Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC). Forms 1120-C are filed by cooperative associations.

[11] Includes returns with assets of less than \$10 million.

[12] Includes returns with assets of \$10 million or more.

[13] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (partnership withholding tax return).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, partnership, S corporation and other taxable returns as well as nontaxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Workload Planning and Analysis.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2010**  
 [Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>42,729</b>	<b>34,051</b>	<b>8,678</b>	<b>23,367,804</b>	<b>23,148,375</b>	<b>219,429</b>
▶ Individual income tax returns, total	34,769	26,130	8,639	3,899,468	3,683,561	215,907
▶ Returns with total positive income under \$200,000 [3]:						
▶ Nonbusiness returns without Earned Income Tax Credit:						
Without Schedules C, E, F, or Form 2106 [4]	4,158	2,017	2,141	122,320	94,573	27,747
With Schedule E or Form 2106 [5]	5,694	3,712	1,982	123,488	118,189	5,299
▶ Business returns without Earned Income Tax Credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	4,978	3,884	1,094	74,660	69,772	4,888
\$25,000 under \$100,000	3,714	3,489	225	63,133	61,387	1,746
\$100,000 under \$200,000	2,404	2,316	88	77,384	75,536	1,848
\$200,000 or more	1,876	1,846	30	140,270	140,096	174
Farm returns	190	167	23	3,491	3,414	77
▶ Business and nonbusiness returns with Earned Income Tax Credit by size of total gross receipts [6, 7]:						
Under \$25,000	1,692	658	1,034	18,782	14,724	4,058
\$25,000 or more	1,469	1,376	93	48,701	48,391	310
▶ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	3,341	2,303	1,038	948,231	919,804	28,427
Business returns	3,265	2,586	679	191,522	183,178	8,344
▶ Returns with total positive income of \$1,000,000 or more [3]	1,970	1,758	212	2,080,471	1,947,482	132,989
▶ International returns [8]	18	18	-	7,015	7,015	-
▶ Corporation income tax returns, except Form 1120-S, total [9]	2,746	2,729	17	17,935,963	17,935,797	166
▶ Returns other than Forms 1120-C and 1120-F [10]:						
▶ Small corporations [11]	1,501	1,488	13	172,705	172,539	166
No balance sheet returns	145	d	d	32,812	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	610	600	10	42,654	42,516	138
\$250,000 under \$1,000,000	406	d	d	29,807	d	d
\$1,000,000 under \$5,000,000	263	263	-	50,516	50,516	-
\$5,000,000 under \$10,000,000	77	77	-	16,916	16,916	-
▶ Large corporations [12]	1,219	1,215	4	17,543,992	17,543,992	[13]
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	293	293	-	224,907	224,907	-
\$50,000,000 under \$100,000,000	104	104	-	193,446	193,446	-
\$100,000,000 under \$250,000,000	130	130	-	559,020	559,020	-
\$250,000,000 under \$500,000,000	88	88	-	202,614	202,614	-
\$500,000,000 under \$1,000,000,000	78	d	d	394,855	d	d
\$1,000,000,000 under \$5,000,000,000	192	d	d	2,033,033	d	d
\$5,000,000,000 under \$20,000,000,000	149	149	-	5,348,295	5,348,295	-
\$20,000,000,000 or more	185	185	-	8,587,822	8,587,822	-
▶ Form 1120-C returns [10]	6	6	-	194,404	194,404	-
▶ Form 1120-F returns [10]	20	20	-	24,862	24,862	-
▶ Estate and trust income tax returns	76	d	d	8,533	d	d
▶ Estate tax returns, total	213	213	-	570,316	570,316	-
▶ Size of gross estate:						
Under \$5,000,000	95	95	-	83,902	83,902	-
\$5,000,000 under \$10,000,000	64	64	-	101,011	101,011	-
\$10,000,000 or more	54	54	-	385,403	385,403	-
▶ Gift tax returns	119	119	-	79,223	79,223	-
▶ Employment tax returns	3,714	3,714	-	386,971	386,971	-
▶ Excise tax returns	1,079	1,079	-	466,029	466,029	-
▶ Other taxable returns [14]	13	d	d	21,301	d	d

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Excludes excise tax returns filed with the U.S. Customs and Border Protection and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

[2] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners and revenue officer examiners in person. However, some field examination cases may ultimately be conducted through correspondence in order to better serve the taxpayer.

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses), but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] Total gross receipts is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an Earned Income Tax Credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-A (corporation income tax return, short form); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-M (mutual income company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-POL (income tax return for certain political associations); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "other taxable returns" described in footnote 14.

[10] Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC). Forms 1120-C are filed by cooperative associations.

[11] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[12] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[13] Less than \$500.

[14] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax; 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); and 8804 (partnership withholding tax return).

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations in which the taxpayer did not agree with the IRS examiner's determination. For information on all examinations of individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, partnership, S corporation and other taxable returns, see Table 9a.

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Workload Planning and Analysis.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2009**

(Money amounts are in thousands of dollars)

Type and size of return	Taxable returns examined with unagreed recommended additional tax [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>44,807</b>	<b>34,665</b>	<b>10,142</b>	<b>29,641,189</b>	<b>29,446,687</b>	<b>194,502</b>
► Individual income tax returns, total	35,941	25,855	10,086	3,991,628	3,803,741	187,887
▷ Returns with total positive income under \$200,000 [3]:						
> Nonbusiness returns without earned income tax credit:						
Without Schedules C, E, F, or Form 2106 [4]	5,775	2,423	3,352	166,898	141,321	25,577
With Schedule E or Form 2106 [5]	6,825	4,353	2,472	1,479,744	1,470,908	8,836
> Business returns without earned income tax credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	4,485	3,711	774	99,288	94,364	4,924
\$25,000 under \$100,000	2,610	2,381	229	57,205	54,818	2,387
\$100,000 under \$200,000	2,156	2,051	105	206,945	204,494	2,451
\$200,000 or more	1,854	1,838	16	151,761	151,700	61
Farm returns	329	d	d	5,939	d	d
> Business and nonbusiness returns with earned income tax credit by size of total gross receipts [6,7]:						
Under \$25,000	2,220	646	1,574	15,689	8,679	7,010
\$25,000 or more	1,605	1,517	88	47,103	46,888	215
▷ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	2,977	2,222	755	238,377	222,780	15,597
Business returns	3,103	2,572	531	214,635	203,379	11,256
▷ Returns with total positive income of \$1,000,000 or more [3]	1,978	1,817	161	1,307,292	1,197,808	109,484
▷ International returns [8]	24	d	d	752	d	d
► Corporation income tax returns, except Form 1120S, total [9]	3,178	3,165	13	23,657,726	23,656,123	1,603
▷ Returns other than Form 1120-F [10]:						
> Small corporations [11]	1,728	d	d	381,866	d	d
No balance sheet returns	250	d	d	197,526	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	701	693	8	57,911	57,906	5
\$250,000 under \$1,000,000	441	d	d	45,112	d	d
\$1,000,000 under \$5,000,000	259	259	-	52,014	52,014	-
\$5,000,000 under \$10,000,000	77	77	-	29,303	29,303	-
> Large corporations [12]	1,422	d	d	23,101,502	d	d
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	389	389	-	263,076	263,076	-
\$50,000,000 under \$100,000,000	94	94	-	95,600	95,600	-
\$100,000,000 under \$250,000,000	105	d	d	286,646	d	d
\$250,000,000 under \$500,000,000	79	79	-	480,681	480,681	-
\$500,000,000 under \$1,000,000,000	90	90	-	687,709	687,709	-
\$1,000,000,000 under \$5,000,000,000	232	d	d	2,918,704	d	d
\$5,000,000,000 under \$20,000,000,000	197	197	-	7,520,033	7,520,033	-
\$20,000,000,000 or more	236	236	-	10,849,053	10,849,053	-
▷ Form 1120-F returns [10]	28	28	-	174,358	174,358	-
► Estate and trust income tax returns	143	108	35	64,473	59,638	4,835
► Estate tax returns:						
▷ Total	239	239	-	1,148,968	1,148,968	-
> Size of gross estate:						
Under \$5,000,000	124	124	-	158,899	158,899	-
\$5,000,000 or more	115	115	-	990,069	990,069	-
► Gift tax returns	238	238	-	192,936	192,936	-
► Employment tax returns	4,053	4,053	-	305,195	305,195	-
► Excise tax returns	952	d	d	117,541	d	d
► Other taxable returns [13]	63	d	d	162,722	d	d

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Excludes excise tax returns filed with Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

[2] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or through correspondence (in selected cases).

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes losses. Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses), but without a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] "Total gross receipts" is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an earned income tax credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040-PR (self-employment income tax return for Puerto Rico residents) and 1040-SS (self-employment income tax return for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands residents).

[9] Includes the Form 1120 series as follows: 1120 (corporation income tax return); 1120-A (corporation income tax return short form); 1120-F (foreign corporation income tax return, except foreign life insurance company, foreign property and casualty insurance company, or foreign sales corporation); 1120-H (homeowner association income tax return); 1120-L (life insurance company income tax return); 1120-M (mutual income company income tax return); 1120-ND (return for nuclear decommissioning funds); 1120-PC (property and casualty insurance company income tax return); 1120-POL (income tax return for certain political associations); 1120-REIT (real estate investment trust income tax return); 1120-RIC (regulated investment company income tax return); and 1120-SF (income tax return for settlement funds). Excludes certain other types of corporation returns, which are included in "other taxable returns" described in footnote 13.

[10] Forms 1120-F are filed by foreign corporations with U.S. income, other than foreign life insurance companies (Form 1120-L); foreign property and casualty insurance companies (Form 1120-PC); or foreign sales corporations (Form 1120-FSC).

[11] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[12] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[13] Includes Forms 1120-S for S corporations reporting a tax; 1120-FSC (foreign sales corporation income tax return); 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); 1120-C (income tax return for cooperative associations); and 8804 (partnership withholding tax return).

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

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2008**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined [1]			Amount unagreed		
	Total	Field [2]	Correspondence	Total	Field [2]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>45,351</b>	<b>33,191</b>	<b>12,160</b>	<b>23,445,478</b>	<b>23,137,115</b>	<b>308,363</b>
▶ Individual income tax returns, total	36,758	24,619	12,139	2,999,544	2,694,383	305,161
▷ Returns with total positive income under \$200,000 [3]:						
> Nonbusiness returns without earned income tax credit:						
Without Schedules C, E, F, or Form 2106 [4]	6,934	2,666	4,268	180,715	147,158	33,557
With Schedule E or Form 2106 [5]	5,853	3,083	2,770	99,781	88,244	11,537
> Business returns without earned income tax credit:						
Nonfarm business returns by size of total gross receipts [6]:						
Under \$25,000	5,184	4,046	1,138	99,416	89,764	9,652
\$25,000 under \$100,000	2,731	2,435	296	87,181	82,875	4,306
\$100,000 under \$200,000	2,152	1,985	167	104,684	100,522	4,162
\$200,000 or more	1,366	1,323	43	80,828	80,410	418
Farm returns	d	d	207	d	d	462
> Business and nonbusiness returns with earned income tax credit by size of total gross receipts [6,7]:						
Under \$25,000	1,894	529	1,365	18,967	9,161	9,806
\$25,000 or more	2,283	2,068	215	53,355	52,923	432
▷ Returns with total positive income of at least \$200,000 and under \$1,000,000 [3]:						
Nonbusiness returns	3,110	1,948	1,162	258,228	194,600	63,628
Business returns	2,852	2,522	330	199,081	191,616	7,465
▷ Returns with total positive income of \$1,000,000 or more [3]	1,880	1,702	178	1,751,206	1,591,470	159,736
▷ International returns [8]	d	d	-	d	d	-
▶ Corporation income tax returns, except Form 1120S, total [9]	3,082	3,074	8	19,531,698	19,531,670	28
▷ Returns other than Form 1120-F [10]:						
> Small corporations [11]	1,864	1,857	7	209,648	209,620	28
No balance sheet returns	184	184	-	29,773	29,773	-
Balance sheet returns by size of total assets:						
Under \$250,000	852	845	7	51,279	51,251	28
\$250,000 under \$1,000,000	427	427	-	42,748	42,748	-
\$1,000,000 under \$5,000,000	306	306	-	63,044	63,044	-
\$5,000,000 under \$10,000,000	95	95	-	22,804	22,804	-
> Large corporations [12]	1,190	d	d	18,561,719	d	d
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	331	d	d	349,316	d	d
\$50,000,000 under \$100,000,000	65	d	d	31,735	d	d
\$100,000,000 under \$250,000,000	101	101	-	224,380	224,380	-
\$250,000,000 under \$500,000,000	56	56	-	141,020	141,020	-
\$500,000,000 under \$1,000,000,000	70	70	-	113,462	113,462	-
\$1,000,000,000 under \$5,000,000,000	228	228	-	2,351,503	2,351,503	-
\$5,000,000,000 under \$20,000,000,000	151	151	-	4,664,916	4,664,916	-
\$20,000,000,000 or more	188	188	-	10,685,387	10,685,387	-
▷ Form 1120-F returns [10]	28	d	d	760,331	d	d
▶ Estate and trust income tax returns	133	126	7	50,497	47,503	2,994
▶ Estate tax returns:						
▷ Total	217	217	-	289,752	289,752	-
> Size of gross estate:						
Under \$5,000,000	121	121	-	62,240	62,240	-
\$5,000,000 or more	96	96	-	227,512	227,512	-
▶ Gift tax returns	143	143	-	120,616	120,616	-
▶ Employment tax returns	4,210	d	d	377,851	d	d
▶ Excise tax returns	770	d	d	41,642	d	d
▶ Other taxable returns [13]	38	34	4	33,878	33,708	170

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

[2] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or through correspondence (in selected cases).

[3] In general, total positive income is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes losses.

Examinations of individual income tax returns are shown in this table by total positive income of: under \$200,000; at least \$200,000 and under \$1,000,000; and \$1,000,000 or more.

[4] Includes Forms 1040 without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[5] Includes Forms 1040 with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses). Excludes returns with a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[6] "Total gross receipts" is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[7] Includes all Forms 1040, those with and without business income, reporting an earned income tax credit claim. These returns are classified by size of total gross receipts. Business returns have total gross receipts reported on Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming). Nonbusiness returns, those with no Schedules C or F, are reported in the "Under \$25,000" classification.

[8] Includes Forms 1040PR (self-employment tax form for Puerto Rico) and 1040-SS (self-employment tax form for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands).

[9] Includes Forms 1120 ("long form"); 1120-A ("short form"); 1120-F (foreign corporation, except foreign life insurance company); 1120-H (homeowner association); 1120-L (life insurance company); 1120M (mutual insurance company); 1120-PC (property and casualty insurance company); 1120-POL (certain political association); 1120-REIT (real estate investment trust); 1120-RIC (regulated investment company); and 1120-SF (settlement fund). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 13.

[10] Form 1120-F is filed by a foreign corporation with U.S. income, other than a foreign life insurance company (Form 1120-L) or a foreign sales corporation (Form 1120-FSC).

[11] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[12] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[13] Includes Forms 1120S for an S corporation reporting a tax; 1120-FSC (foreign sales corporation); 8288 (withholding tax return for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association); and 8804 (partnership withholding).

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

SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Examination Management Information Systems and Automation SE:S:E:EPD:MISA

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2007**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined			Amount unagreed		
	Total	Field [1]	Correspondence	Total	Field [1]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>40,637</b>	<b>29,645</b>	<b>10,992</b>	<b>22,781,936</b>	<b>22,015,389</b>	<b>766,547</b>
Individual income tax returns, total	[2] 32,983	22,073	10,910	[3] 2747,466	1,981,359	766,107
Returns with TPI under \$200,000 [4]:						
Nonbusiness returns without earned income tax credit:						
Selected nonbusiness returns [5]	6,926	3,490	3,436	341,973	316,769	25,204
With Schedule E or Form 2106 [6]	4,901	2,613	2,288	88,063	70,751	17,312
Business and nonbusiness returns with earned income tax credit by size of TGR [7,8]:						
Under \$25,000	2,270	471	1,799	18,417	11,684	6,733
\$25,000 or more	2,634	2,072	562	34,910	34,049	861
Business returns without earned income tax credit:						
Nonfarm business returns by size of TGR [7]:						
Under \$25,000	4,529	3,674	855	78,418	52,371	26,047
\$25,000 under \$100,000	2,161	1,793	368	43,073	36,551	6,522
\$100,000 under \$200,000	2,504	2,148	356	165,667	154,503	11,164
\$200,000 or more	590	536	54	50,183	47,367	2,816
Farm returns	447	d	d	6,387	d	d
Returns with TPI at least \$200,000 and under \$1,000,000:						
Nonbusiness returns	2,277	1,609	668	228,217	178,062	50,154
Business returns	2,071	1,850	221	158,824	147,372	11,452
Returns with TPI of \$1,000,000 or more	1,668	1,479	189	1,533,270	925,730	607,539
International returns [9]	5	d	d	65	d	d
Corporation income tax returns, except Form 1120S, total [10]	2,526	2,510	16	18,760,576	18,760,576	[11]
Returns other than Form 1120-F [12]:						
Small corporations [13]	1,398	1,382	16	365,472	365,472	[11]
No balance sheet returns	177	177	-	157,676	157,676	-
Balance sheet returns by size of total assets:						
Under \$250,000	578	564	14	32,729	32,729	[11]
\$250,000 under \$1,000,000	343	d	d	57,347	d	d
\$1,000,000 under \$5,000,000	232	232	-	88,361	88,361	-
\$5,000,000 under \$10,000,000	68	d	d	29,359	d	d
Large corporations [14]	1,108	1,108	-	18,308,946	18,308,946	-
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	270	270	-	143,707	143,707	-
\$50,000,000 under \$100,000,000	61	61	-	26,769	26,769	-
\$100,000,000 under \$250,000,000	79	79	-	196,580	196,580	-
\$250,000,000 under \$500,000,000	47	47	-	208,930	208,930	-
\$500,000,000 under \$1,000,000,000	63	63	-	276,443	276,443	-
\$1,000,000,000 under \$5,000,000,000	209	209	-	3,036,980	3,036,980	-
\$5,000,000,000 under \$20,000,000,000	182	182	-	3,836,978	3,836,978	-
\$20,000,000,000 and above	197	197	-	10,582,559	10,582,559	-
Form 1120-F returns [12]	20	20	-	86,158	86,158	-
Estate and trust income tax returns	229	204	25	121,756	121,756	[11]
Estate tax returns:						
Total	277	277	-	500,834	500,834	-
Size of gross estate:						
Under \$5,000,000	179	179	-	119,263	119,263	-
\$5,000,000 or more	98	98	-	381,571	381,571	-
Gift tax returns	250	250	-	102,143	102,143	-
Employment tax returns	3,724	3,705	19	246,717	246,544	173
Excise tax returns	588	566	22	80,685	80,418	267
Other taxable returns [15]	60	60	-	221,759	221,759	-

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or by correspondence.

[2] Excludes 10 returns associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.

[3] Excludes \$22 (thousands) associated with the earned income tax credit (EITC) qualifying child certification test, which is tracked in IRS's examination database.

[4] In general, TPI (total positive income) is the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses. Examinations of individual income tax returns are shown in this table by: TPI of under \$200,000; TPI of at least \$200,000 and under \$1,000,000; and TPI of \$1,000,000 or more.

[5] Includes returns without a Schedule C (nonfarm sole proprietorship), Schedule E (supplemental income and loss), Schedule F (profit or loss from farming), or Form 2106 (employee business expenses).

[6] Includes returns with a Schedule E (supplemental income and loss) or Form 2106 (employee business expenses). Excludes returns with a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming).

[7] TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[8] Includes both business and nonbusiness returns with an earned income tax credit claim. These returns are classified by size of total gross receipts (TGR). Returns are classified as business if they have a Schedule C (nonfarm sole proprietorship) or Schedule F (profit or loss from farming) and TGR is greater than total positive income (TPI). Returns are classified

[9] Includes Forms 1040PR (self-employment tax form for Puerto Rico) and 1040-SS (self-employment tax form for U.S. Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands).

[10] Includes Forms 1120 ("long form"); 1120-A ("short form"); 1120-F (foreign corporation, except foreign life insurance company); 1120-H (homeowner association); 1120-L (life insurance company); 1120M (mutual insurance company); 1120-PC (property and casualty insurance company); 1120-POL (certain political association);

[11] Less than \$500.

[12] Form 1120-F is filed by a foreign corporation with U.S. income, other than a foreign life insurance company and foreign sales corporation.

[13] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[14] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[15] Includes Forms 1120S for an S corporation reporting a tax; 1120-FSC (foreign sales corporation); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association); and 8804 (partnership withholding).

NOTES: Detail may not add to totals because of rounding. Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

SOURCE: Internal Revenue Service Data Book, 2007. REVISED APRIL 2009.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2006**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined			Amount unagreed		
	Total	Field [1]	Correspondence	Total	Field [1]	Correspondence
	(1)	(2)	(3)	(4)	(5)	(6)
<b>United States, total</b>	<b>37,137</b>	<b>26,507</b>	<b>10,630</b>	<b>24,064,661</b>	<b>23,811,017</b>	<b>253,644</b>
Individual income tax returns, total	29,595	19,034	10,561	2,170,568	1,916,938	253,630
Nonbusiness returns:						
Form 1040A with TPI under \$25,000 [2, 3]	1,058	380	678	15,981	10,692	5,289
All other returns by size of TPI [3]:						
Under \$25,000	2,284	715	1,569	55,739	38,320	17,419
\$25,000 under \$50,000	4,328	2,151	2,177	59,869	37,732	22,137
\$50,000 under \$100,000	6,421	3,851	2,570	52,766	41,541	11,225
\$100,000 or more	7,301	5,162	2,139	1,489,779	1,332,578	157,201
Business returns by size of TGR [4]:						
Nonfarm returns:						
Under \$25,000	1,145	682	463	42,134	22,422	19,712
\$25,000 under \$100,000	2,797	2,233	564	47,857	40,802	7,055
\$100,000 or more	4,093	3,707	386	395,043	381,836	13,207
Farm returns:						
Under \$100,000	62	50	12	963	638	325
\$100,000 or more	106	103	3	10,437	10,377	60
Corporation income tax returns, except Form 1120S, total [5]	2,473	2,423	50	20,194,476	20,194,462	14
Returns other than Form 1120-F [6]:						
Small corporations [7]	1,080	d	d	284,424	d	d
No balance sheet returns	145	d	d	88,280	d	d
Balance sheet returns by size of total assets:						
Under \$250,000	485	448	37	25,292	25,292	[8]
\$250,000 under \$1,000,000	215	208	7	23,452	23,452	[8]
\$1,000,000 under \$5,000,000	168	165	3	23,055	23,041	14
\$5,000,000 under \$10,000,000	67	67	-	124,345	124,345	-
Large corporations [9]	1,372	d	d	19,815,988	d	d
Balance sheet returns by size of total assets:						
\$10,000,000 under \$50,000,000	240	240	-	223,965	223,965	-
\$50,000,000 under \$100,000,000	67	67	-	65,322	65,322	-
\$100,000,000 under \$250,000,000	121	d	d	165,147	d	d
\$250,000,000 or more	944	944	-	19,361,554	19,361,554	-
Form 1120-F returns [6]	21	21	-	94,064	94,064	-
Estate and trust income tax returns	386	367	19	47,437	47,437	[8]
Estate tax returns:						
Total	301	301	-	915,851	915,851	-
Size of gross estate:						
Under \$5,000,000	199	199	-	131,756	131,756	-
\$5,000,000 or more	102	102	-	784,095	784,095	-
Gift tax returns	295	295	-	357,632	357,632	-
Employment tax returns	2,800	2,800	-	319,207	319,207	-
Excise tax returns	1,263	1,263	-	26,576	26,576	-
Other taxable returns [10]	24	24	-	32,914	32,914	-

d — Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.

[1] Field examinations are generally performed by revenue agents, tax compliance officers, tax examiners, and revenue officer examiners, in person or by correspondence.

[2] Form 1040A is one of the two IRS individual income tax return "short forms."

[3] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses.

[4] TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F. Schedule C is used to report profit or loss from nonfarm sole proprietorships. Schedule F is used to report profit or loss from farming. If a taxpayer reports both farm and nonfarm income, the return is classified by the larger source of income.

[5] Includes Forms 1120 ("long form"); 1120-A ("short form"); Form 1120-F (foreign corporations, except foreign life insurance companies); 1120-H (homeowner associations); Form 1120-L (life insurance companies); Form 1120M (mutual insurance companies); Form 1120-PC (property and casualty insurance companies); 1120-POL (certain political associations); 1120-REIT (real estate investment trusts); 1120-RIC (regulated investment companies); and 1120-SF (settlement funds). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 10.

[6] Forms 1120-F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.

[7] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[8] Less than \$500.

[9] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.

[10] Includes Forms 1120S for S corporations reporting a tax; 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association income tax); and 8804 (annual return for partnership withholding).

NOTES: Detail may not add to totals because of rounding. Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau, and returns of tax-exempt organizations, Government entities, and employee plans.

SOURCE: Internal Revenue Service Data Book, 2006. REVISED APRIL 2009.

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax**  
**After Examination, by Type and Size of Return, Fiscal Year 2005**  
 [Money amounts are in thousands of dollars.]

Type and size of return	Taxable returns examined						Amount unagreed					
	Total	Revenue agent		Tax compliance officer [1]	Tax examiner [1]	Compliance center [1]	Total	Revenue agent		Tax compliance officer [1]	Tax examiner [1]	Compliance center [1]
		CIC [1]	Non-CIC [1,2]					CIC [1]	Non-CIC [1,3]			
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	
<b>United States, total [4]</b>	<b>36,346</b>	<b>1,199</b>	<b>15,262</b>	<b>8,332</b>	<b>168</b>	<b>11,385</b>	<b>26,561,476</b>	<b>20,883,295</b>	<b>4,733,406</b>	<b>104,606</b>	<b>2,137</b>	<b>838,028</b>
Individual income tax returns, total	29,603	45	9,830	8,250	165	11,313	2,646,068	15,337	1,689,658	101,890	2,124	837,057
Nonbusiness returns:												
Form 1040A with TPI under \$25,000 [5,6]	1,345	--	207	155	9	974	29,519	--	11,501	3,903	42	14,072
All other returns by size of TPI [6]:												
Under \$25,000	3,052	**	383	281	**	2,375	23,466	**	13,250	1,683	**	8,260
\$25,000 under \$50,000	4,156	**	767	1,188	**	2,170	161,261	**	33,764	5,825	**	121,390
\$50,000 under \$100,000	5,901	--	1,255	2,603	25	2,018	95,921	--	71,438	14,057	**	10,224
\$100,000 or more	6,875	34	2,935	1,478	27	2,200	1,820,085	10,098	1,100,324	31,417	755	677,490
Business returns:												
Schedule C returns by size of TGR [7]:												
Under \$25,000	1,670	--	**	476	**	816	11,782	--	**	2,376	**	1,269
\$25,000 under \$100,000	3,110	--	1,176	1,309	46	579	56,019	--	35,532	17,317	794	2,376
\$100,000 or more	3,504	8	2,578	734	16	168	435,424	4,881	403,376	25,074	130	1,963
Schedule F returns by size of TGR [7]:												
Under \$100,000	39	--	**	**	--	10	623	--	**	**	--	13
\$100,000 or more	151	--	126	22	--	3	11,969	--	11,735	233	--	1
Corporation income tax returns, except Form 1120S, total [8]	2,605	825	1,748	--	--	32	22,315,630	20,436,307	1,879,316	--	--	7
Returns other than Form 1120-F [9]:												
Small corporations [10]	1,048	18	1,011	--	--	19	263,604	51,412	212,185	--	--	7
No balance sheet returns	137	**	121	--	--	**	121,383	**	76,599	--	--	**
Balance sheet returns by size of total assets:												
Under \$250,000	437	**	423	--	--	**	39,591	**	39,586	--	--	**
\$250,000 under \$1,000,000	229	**	225	--	--	**	22,173	**	22,171	--	--	**
\$1,000,000 under \$5,000,000	166	**	164	--	--	**	45,465	**	38,837	--	--	**
\$5,000,000 under \$10,000,000	79	**	78	--	--	**	34,992	**	34,992	--	--	**
Large corporations [11]	1,524	803	708	N/A	--	13	22,003,435	20,357,078	1,646,357	N/A	--	--
Balance sheet returns by size of total assets:												
\$10,000,000 under \$50,000,000	249	5	238	N/A	--	6	260,726	31,376	229,350	N/A	--	[12]
\$50,000,000 under \$100,000,000	86	4	82	N/A	--	--	74,981	[12]	74,981	N/A	--	--
\$100,000,000 under \$250,000,000	124	21	103	N/A	--	--	485,801	371,920	113,881	N/A	--	--
\$250,000,000 or more	1,065	773	285	N/A	--	7	21,181,927	19,953,782	1,228,145	N/A	--	[12]
Form 1120-F returns [9]	33	4	29	N/A	--	--	48,591	27,817	20,774	N/A	--	--
Estate and trust income tax returns	470	--	449	--	--	21	89,048	--	88,118	--	--	930
Estate tax returns, total	351	--	348	N/A	3	--	378,045	--	378,032	N/A	13	--
Size of gross estate:												
Under \$5,000,000	240	--	237	N/A	3	--	199,507	--	199,494	N/A	13	--
\$5,000,000 or more	111	--	111	N/A	--	--	178,538	--	178,538	N/A	--	--
Gift tax returns	384	--	384	N/A	--	--	592,749	--	592,749	N/A	--	--
Employment tax returns	2,064	165	1,800	82	--	17	360,556	299,888	57,935	2,716	--	17
Excise tax returns [4]	803	**	**	--	--	**	57,848	**	**	--	--	**
Other taxable returns [13]	66	**	**	--	--	**	121,531	**	**	--	--	**

N/A - Not applicable.  
 \*\* Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.  
 [1] CIC (Coordinated Industry Case) examinations cover a taxpayer and its effectively controlled entities that warrant application of team examination procedures. Tax compliance officers perform examinations on selected individual and business taxpayers involving complex tax issues in face-to-face meetings and through correspondence. Tax examiners for field operations and compliance centers perform examinations by way of correspondence.  
 [2] Non-CIC examinations include 571 employment tax returns examined by revenue officer examiners.  
 [3] Non-CIC amount unagreed includes \$7,646,000 related to employment tax returns examined by revenue officer examiners.  
 [4] Comprises all returns except those of tax-exempt organizations, Government entities, employee plans, and returns cited in Table 10, footnote 17. Also excludes excise tax returns filed with the Customs Service and Alcohol and Tobacco Tax and Trade Bureau.  
 [5] Form 1040A is one of the two IRS individual income tax return "short forms."  
 [6] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses.  
 [7] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (which can be positive or negative) from Schedule F.  
 [8] Includes Forms 1120 ("long form"); 1120-A ("short form"); Form 1120-F (foreign corporations, except foreign life insurance companies); 1120-H (homeowner associations); Form 1120-L (life insurance companies); Form 1120M (mutual insurance companies); Form 1120-PC (property and casualty insurance companies); 1120-POL (certain political associations); 1120-REIT (real estate investment trusts); 1120-RIC (regulated investment companies); and 1120-SF (settlement funds). Excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 13.  
 [9] Forms 1120-F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.  
 [10] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.  
 [11] Includes returns with assets of \$10 million or more examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.  
 [12] Less than \$500.  
 [13] Includes Forms 1120S for S corporations reporting a tax; 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association income tax); and 8804 (annual return for partnership withholding).

NOTE: Detail may not add to totals because of rounding.  
 SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Examination Management Information Systems and Automation SE:SE:EPD:MISA  
 Revised September 2007

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax**  
**After Examination, by Type and Size of Return, Fiscal Year 2004**  
 [Money amounts are in thousands of dollars.]

Type and size of return	Taxable returns examined [1]							Amount unagreed						
	Total	Revenue agent		Tax auditor/ compliance officer [2]	Tax examiner [2]	Revenue officer examiner [3]	Compliance center [2]	Total	Revenue agent		Tax auditor/ compliance officer [2]	Tax examiner [2]	Revenue officer examiner [3]	Compliance center [2]
		CIC [2]	Non-CIC [2]						CIC [2]	Non-CIC [2]				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
<b>United States, total [4]</b>	<b>30,640</b>	<b>1,057</b>	<b>11,604</b>	<b>6,499</b>	<b>198</b>	<b>218</b>	<b>11,064</b>	<b>12,427,498</b>	<b>9,007,795</b>	<b>3,132,685</b>	<b>109,226</b>	<b>1,915</b>	<b>13,734</b>	<b>162,142</b>
<b>Income, estate, and gift tax, total [5]</b>	<b>28,108</b>	<b>555</b>	<b>9,837</b>	<b>6,468</b>	<b>198</b>	<b>[X]</b>	<b>11,050</b>	<b>12,101,582</b>	<b>8,794,926</b>	<b>3,033,710</b>	<b>108,951</b>	<b>1,915</b>	<b>--</b>	<b>162,079</b>
Individual income tax returns, total	25,017	12	7,321	6,468	196	[X]	11,020	1,100,307	19,880	806,699	108,951	1,903	--	160,874
Nonbusiness returns:														
Form 1040A with TPI under \$25,000 [6,7]	1,657	[X]	208	207	57	[X]	1,185	28,015	--	14,732	4,422	93	--	8,768
All other returns by size of TPI [7]:														
Under \$25,000	2,944	[X]	291	188	34	[X]	2,431	31,413	--	21,073	1,735	151	--	8,454
\$25,000 under \$50,000	3,329	[X]	551	907	39	[X]	1,832	61,230	--	36,887	6,373	145	--	17,825
\$50,000 under \$100,000	4,362	[X]	992	1,933	28	[X]	1,409	46,852	--	27,665	12,987	386	--	5,814
\$100,000 or more	6,442	9	2,543	1,328	34	[X]	2,528	672,189	13,989	497,399	45,147	1,068	--	114,586
Business returns:														
Schedule C returns by size of TGR [8]:														
Under \$25,000	1,284	[X]	222	315	[X]	[X]	745	10,260	--	7,867	1,530	11	--	852
\$25,000 under \$100,000	2,306	[X]	688	1,014	[X]	[X]	603	37,633	--	22,879	12,094	12	--	2,648
\$100,000 or more	2,489	3	1,661	562	[X]	[X]	263	197,624	5,891	165,259	24,601	--	--	1,873
Schedule F returns by size of TGR [8]:														
Under \$100,000	66	[X]	42	9	[X]	[X]	15	571	--	499	38	--	--	34
\$100,000 or more	138	[X]	123	5	[X]	[X]	9	14,521	--	14,439	24	37	--	21
Corporation income tax returns, except Form 1120S, total [9]	2,000	543	1,429	[X]	[X]	[X]	28	10,162,115	8,775,046	1,385,864	--	--	--	1,205
Returns other than Form 1120-F [10]:														
Small corporations [11]	818	12	785	[X]	[X]	[X]	21	343,594	659	342,531	--	--	--	404
No balance sheet returns	99	6	84	[X]	[X]	[X]	9	79,515	75	79,087	--	--	--	353
Balance sheet returns by size of total assets:														
Under \$250,000	277	[X]	271	[X]	[X]	[X]	6	61,720	--	61,698	--	--	--	22
\$250,000 under \$1,000,000	196	[X]	190	[X]	[X]	[X]	5	36,272	160	36,089	--	--	--	23
\$1,000,000 under \$5,000,000	176	[X]	174	[X]	[X]	[X]	[X]	70,432	158	70,268	--	--	--	6
\$5,000,000 under \$10,000,000	70	4	66	[X]	[X]	[X]	[X]	95,655	266	95,389	--	--	--	--
Large corporations [12]	1,154	514	633	N/A	[X]	[X]	7	9,709,276	8,675,755	1,032,720	N/A	--	--	801
Balance sheet returns by size of total assets:														
\$10,000,000 under \$50,000,000	175	10	165	N/A	[X]	[X]	[X]	97,893	880	97,013	N/A	--	--	--
\$50,000,000 under \$100,000,000	89	[X]	87	N/A	[X]	[X]	[X]	97,190	7,309	89,881	N/A	--	--	--
\$100,000,000 under \$250,000,000	150	15	130	N/A	[X]	[X]	5	194,251	19,598	174,653	N/A	--	--	[14]
\$250,000,000 or more	740	487	251	N/A	[X]	[X]	[X]	9,319,942	8,647,968	671,173	N/A	--	--	801
Form 1120-F returns [10]	28	17	11	N/A	[X]	[X]	[X]	109,245	98,632	10,613	N/A	--	--	--
Estate and trust income tax returns	391	[X]	389	[X]	[X]	[X]	[X]	83,831	--	83,831	--	--	--	[14]
Estate tax returns:														
Total	401	[X]	400	N/A	[X]	[X]	[X]	316,528	--	316,521	N/A	7	--	--
Size of gross estate:														
Under \$1,000,000	65	[X]	64	N/A	[X]	[X]	[X]	24,689	--	24,682	N/A	7	--	--
\$1,000,000 under \$5,000,000	237	[X]	237	N/A	[X]	[X]	[X]	96,065	--	96,065	N/A	--	--	--
\$5,000,000 or more	99	[X]	99	N/A	[X]	[X]	[X]	195,774	--	195,774	N/A	--	--	--
Gift tax returns	299	[X]	298	N/A	[X]	[X]	[X]	438,800	--	438,795	N/A	5	--	--
<b>Employment tax returns</b>	<b>1,381</b>	<b>108</b>	<b>1,019</b>	<b>31</b>	<b>[X]</b>	<b>218</b>	<b>5</b>	<b>118,393</b>	<b>88,685</b>	<b>15,669</b>	<b>275</b>	<b>--</b>	<b>13,734</b>	<b>30</b>
<b>Excise tax returns [4]</b>	<b>1,101</b>	<b>355</b>	<b>738</b>	<b>[X]</b>	<b>[X]</b>	<b>[X]</b>	<b>8</b>	<b>102,339</b>	<b>31,958</b>	<b>70,348</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>33</b>
<b>Other taxable returns [13]</b>	<b>50</b>	<b>39</b>	<b>10</b>	<b>[X]</b>	<b>[X]</b>	<b>[X]</b>	<b>[X]</b>	<b>105,184</b>	<b>92,226</b>	<b>12,958</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

N/A - Not applicable.  
 [X] Less than 3.  
 [1] Comprises all returns except those of tax-exempt/Government entity organizations, employee plans, and others mentioned in Table 10, footnote 17. Also excludes excise tax returns mentioned in footnote 4.  
 [2] CIC (Coordinated Industry Case), formerly known as CEP (Coordinated Examination Program), covers "a taxpayer, and its effectively controlled entities, that warrants application of 'team examination' procedures." Tax auditors are Compliance personnel who are required to have 9 semester hours of accounting and who perform examinations on selected individual, employment, and excise returns. Tax Compliance Officers (TCO) are Compliance personnel who are required to have 6 to 12 semester hours of accounting and who perform examinations on selected individual and business taxpayers involving complex tax issues. Tax examiners for field operations and Compliance Centers perform examinations by way of correspondence.  
 [3] Revenue officer examiners are employees who have been trained to do certain employment tax returns. Data are collected for these individuals and shown separately from other employment returns.  
 [4] Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau.  
 [5] Comprises returns shown as individual income tax, corporation income tax, estate and trust income tax, estate tax, and gift tax. Excludes returns shown as employment, excise, and other taxable returns.  
 [6] Form 1040A is one of the two IRS individual income tax return "short forms."  
 [7] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return and, thus, excludes net losses.  
 [8] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (can be positive or negative) from Schedule F.  
 [9] Includes Forms 1120 ("long form"), 1120-A ("short form"), Form 1120-F (foreign corporations, except foreign life insurance companies); 1120-H (homeowner associations); Form 1120-L (life insurance companies); Form 1120M (mutual insurance companies); Form 1120-PC (property and casualty insurance companies); 1120-POL (certain political associations); 1120-REIT (real estate investment trusts); 1120-RIC (regulated investment companies); and 1120-SF (settlement funds). However, total excludes certain other types of corporations, which are included in "other taxable returns" described in footnote 13.  
 [10] Forms 1120-F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.  
 [11] Includes returns with assets of less than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.  
 [12] Includes returns with assets of more than \$10 million examined by either the Small Business/Self-Employed Operating Division or the Large and Mid-Size Business Operating Division.  
 [13] Includes Forms 1120S, which are returns filed by qualifying corporations electing to be taxed through shareholders. Under certain conditions, some of these corporations are subject to tax. Also includes Forms 1120-FSC (foreign sales corporations), 8280 (withholding tax returns for disposition by foreign persons of U.S. property interests); 990-C (farmers' cooperative association income tax); and 8804 (annual return for partnership withholding).  
 [14] Less than \$500.  
 NOTE: Detail may not add to totals because of rounding.  
 SOURCE: Small Business/Self-Employed, Examination, Examination Planning and Delivery, Examination Management Information Systems and Automation SE:SE:EPD:MISA



**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax**

**After Examination, by Type and Size of Return, Fiscal Year 2003**

[Money amounts are in thousands of dollars.]

Type and size of return	Taxable returns examined [1]							Amount unagreed						
	Total	Revenue agent		Tax auditor/ compliance officer [2]	Tax examiner [2]	Revenue office examiner [3]	Compliance center [2]	Total	Revenue agent		Tax auditor/ compliance officer [2]	Tax examiner [2]	Revenue office examiner [3]	Compliance center [2]
		CIC [2]	Non-CIC [2]						CIC [2]	Non-CIC [2]				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
<b>United States, total [4]</b>	<b>25,490</b>	<b>965</b>	<b>10,691</b>	<b>6,347</b>	<b>147</b>	<b>186</b>	<b>7,154</b>	<b>11,781,068</b>	<b>8,981,203</b>	<b>2,629,863</b>	<b>92,563</b>	<b>1,026</b>	<b>2,399</b>	<b>74,014</b>
<b>Income, estate, and gift tax, total [5]</b>	<b>23,368</b>	<b>574</b>	<b>9,171</b>	<b>6,323</b>	<b>147</b>	--	<b>7,153</b>	<b>11,273,674</b>	<b>8,570,957</b>	<b>2,536,813</b>	<b>90,864</b>	<b>1,026</b>	--	<b>74,014</b>
Individual income tax returns, total	20,339	25	6,714	6,319	147	--	7,134	955,176	21,178	769,346	90,015	1,026	--	73,611
Nonbusiness returns:														
Form 1040A with TPI under \$25,000 [6,7]	1,974	--	286	248	27	--	1,413	36,218	--	14,457	6,820	212	--	14,729
All other returns by size of TPI [7]														
Under \$25,000	2,460	--	268	257	15	--	1,920	28,365	--	18,465	3,207	112	--	6,581
\$25,000 under \$50,000	2,281	--	574	923	47	--	737	20,781	--	14,105	4,049	160	--	2,467
\$50,000 under \$100,000	3,618	--	946	1,751	36	--	885	61,940	--	45,469	11,404	313	--	4,754
\$100,000 or more	4,708	17	2,426	1,229	15	--	1,021	570,882	9,307	496,308	22,710	144	--	42,413
Business returns:														
Schedule C returns by size of TGR: [8]														
Under \$25,000	1,165	--	141	385	3	--	636	8,988	--	5,914	2,181	7	--	886
\$25,000 under \$100,000	1,940	--	613	915	2	--	410	33,128	--	19,964	12,056	2	--	1,106
\$100,000 or more	2,096	5	1,389	598	2	--	102	179,242	10,718	140,807	26,987	76	--	654
Schedule F returns by size of TGR: [8]														
Under \$100,000	24	--	11	5	--	--	8	1,481	--	1,271	191	--	--	19
\$100,000 or more	73	3	60	8	--	--	2	14,151	1,153	12,586	410	--	--	2
Corporation income tax returns, except Form 1120S, total [9]	1,911	546	1,342	4	--	--	19	9,266,107	8,549,779	715,076	849	--	--	403
Returns other than Form 1120F: [10]														
No balance sheet returns	136	16	106	--	--	--	14	65,410	43,691	21,445	--	--	--	274
Balance sheet returns by size of total assets:														
Under \$250,000	242	2	240	--	--	--	--	24,319	630	23,689	--	--	--	--
\$250,000 under \$1,000,000	221	--	216	3	--	--	2	21,680	--	20,943	608	--	--	129
\$1,000,000 under \$5,000,000	261	5	255	1	--	--	--	44,712	11,661	32,810	241	--	--	--
\$5,000,000 under \$10,000,000	64	1	63	--	--	--	--	12,413	[12]	12,413	--	--	--	--
\$10,000,000 under \$50,000,000	144	6	135	N/A	--	--	3	102,624	14,001	88,623	N/A	--	--	[12]
\$50,000,000 under \$100,000,000	95	8	87	N/A	--	--	--	99,162	15,594	83,568	N/A	--	--	--
\$100,000,000 under \$250,000,000	112	19	93	N/A	--	--	--	363,274	311,399	51,875	N/A	--	--	--
\$250,000,000 or more	625	484	141	N/A	--	--	--	8,447,427	8,106,477	340,950	N/A	--	--	--
Form 1120F returns [10]	11	5	6	N/A	--	--	--	85,086	46,326	38,760	N/A	--	--	--
Estate and trust income tax returns	452	1	451	--	--	--	--	47,375	[12]	47,375	--	--	--	--
Estate tax returns:														
Total	348	--	348	N/A	--	--	--	653,958	--	653,958	N/A	--	--	--
Size of gross estate:														
Under \$1,000,000	50	--	50	N/A	--	--	--	18,407	--	18,407	N/A	--	--	--
\$1,000,000 under \$5,000,000	195	--	195	N/A	--	--	--	81,062	--	81,062	N/A	--	--	--
\$5,000,000 or more	103	--	103	N/A	--	--	--	554,489	--	554,489	N/A	--	--	--
Gift tax returns	318	2	316	N/A	--	--	--	351,058	[12]	351,058	N/A	--	--	--
<b>Employment tax returns</b>	<b>1,180</b>	<b>62</b>	<b>907</b>	<b>24</b>	<b>--</b>	<b>186</b>	<b>1</b>	<b>429,084</b>	<b>360,276</b>	<b>64,710</b>	<b>1,699</b>	<b>--</b>	<b>2,399</b>	<b>[12]</b>
<b>Excise tax returns [4]</b>	<b>899</b>	<b>295</b>	<b>604</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>13,545</b>	<b>3,289</b>	<b>10,256</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>
<b>Other taxable returns [9,11]</b>	<b>43</b>	<b>34</b>	<b>9</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>64,765</b>	<b>46,681</b>	<b>18,084</b>	<b>--</b>	<b>--</b>	<b>--</b>	<b>--</b>

N/A - Not applicable.

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

[1] Comprises all returns except those of tax-exempt/Government entity organizations, employee plans, and others mentioned in Table 10, footnote 13. See also, footnote 4, below.

[2] CIC (Coordinated Industry Case), formerly known as CEP (Coordinated Examination Program), covers "a taxpayer, and its effectively controlled entities, that warrants application of 'team examination' procedures."

Tax auditors are Compliance personnel who are required to have 9 semester hours of accounting and who perform examinations on selected individual, employment, and excise returns. Tax Compliance Officers (TCO) are Compliance personnel who are required to have 6 to 12 semester hours of accounting and who perform examinations on selected individual and business taxpayers involving complex tax issues. Tax examiners for field operations and Compliance Centers perform examinations on correspondence.

[3] Comprises work performed by revenue officer examiners. These examiners are employees who have been trained to do certain employment tax returns. Data are collected for these individuals and shown separately from other employment returns, separately from other employment returns.

[4] Excludes excise tax returns filed with the Customs Service and the Alcohol and Tobacco Tax and Trade Bureau.

[5] Comprises returns shown as individual income tax, corporation income tax, estate and trust income tax, estate tax, and gift tax. Excludes returns shown as employment, excise, and other taxable returns.

[6] Form 1040A is one of the two IRS individual income tax return "short forms."

[7] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and, thus, excludes net losses. For example, it includes "business or profession net income," but not "business or profession net loss."

[8] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (can be positive or negative) from Schedule F.

[9] Excludes Forms 1120S, which are returns filed by qualifying corporations electing to be taxed through shareholders. Under certain conditions, some of these corporations are subject to tax and are included in "other taxable returns" in this table. Total for corporations also excludes certain other types of corporations, which are included in "other taxable returns," described in footnote 11, below.

[10] Forms 1120F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.

[11] Includes Forms 1120S (for S corporations reporting a tax; see also footnote 9); 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); 990C (Farmers' Cooperative Association Income Tax); and 8804 (Annual Return for Partnership Withholding).

[12] Less than \$500.

SOURCE: IRS Data Book, FY 2003, Publication 55b. Also, Small Business/Self-Employed, Compliance, Compliance Policy, Centralized Workload Selection and Delivery.

Examination Management Information Systems and Automation SE:S:C:CP:EW:EMIS

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax**  
**After Examination, by Type and Size of Return, Fiscal Year 2002**  
 [Money amounts are in thousands of dollars.]

Type and size of return	Taxable returns examined [1]							Amount unagreed						
	Total	Revenue agent		Tax auditor/ compliance officer [2]	Tax examiner [2]	Revenue office examiner [3]	Compliance center [2]	Total	Revenue agent		Tax auditor/ compliance officer [2]	Tax examiner [2]	Revenue office examiner [3]	Compliance center [2]
		CIC [2]	Non-CIC [2]						CIC [2]	Non-CIC [2]				
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	
<b>United States, total [4]</b>	<b>25,459</b>	<b>1,283</b>	<b>12,041</b>	<b>6,547</b>	<b>126</b>	<b>177</b>	<b>5,285</b>	<b>13,301,853</b>	<b>10,067,476</b>	<b>3,122,755</b>	<b>80,626</b>	<b>1,859</b>	<b>1,611</b>	<b>27,526</b>
<b>Income, estate, and gift tax, total [5]</b>	<b>22,305</b>	<b>702</b>	<b>9,664</b>	<b>6,547</b>	<b>125</b>	--	<b>5,267</b>	<b>12,907,670</b>	<b>9,764,894</b>	<b>3,032,823</b>	<b>80,626</b>	<b>1,856</b>	--	<b>27,471</b>
Individual income tax returns, total	18,958	56	6,982	6,547	125	--	5,248	1,016,372	216,775	692,997	80,626	1,856	--	24,118
Nonbusiness returns:														
Form 1040A with TPI under \$25,000 [6,7]	3,517	--	390	637	29	--	2,461	20,016	--	8,718	3,543	140	--	7,615
All other returns by size of TPI [7]														
Under \$25,000	1,509	--	407	340	15	--	747	32,290	--	25,642	2,350	120	--	4,178
\$25,000 under \$50,000	2,258	--	693	1,084	25	--	456	24,998	--	17,298	6,596	114	--	1,020
\$50,000 under \$100,000	2,842	--	950	1,474	13	--	405	45,927	--	34,914	8,835	640	--	1,538
\$100,000 or more	3,844	40	2,379	1,090	18	--	317	497,917	100,958	364,035	25,008	455	--	7,461
Business returns:														
Schedule C returns by size of TGR [8]														
Under \$25,000	999	--	157	291	9	--	542	9,022	--	6,419	1,553	37	--	1,013
\$25,000 under \$100,000	1,780	2	537	990	10	--	241	55,669	123	40,735	13,910	131	--	770
\$100,000 or more	2,077	12	1,366	625	6	--	68	317,051	113,784	184,041	18,766	219	--	241
Schedule F returns by size of TGR [8]														
Under \$100,000	30	--	16	8	--	--	6	763	--	734	25	--	--	4
\$100,000 or more	102	2	87	8	--	--	5	12,719	1,910	10,461	70	--	--	278
Corporation income tax returns, except Form 1120S, total [9]	2,172	645	1,513	N/A	--	--	14	10,554,259	9,548,119	1,005,984	N/A	--	--	156
Returns other than Form 1120F [10]														
No balance sheet returns	131	18	100	N/A	--	--	13	35,712	15,625	19,931	N/A	--	--	156
Balance sheet returns by size of total assets:														
Under \$250,000	281	1	280	N/A	--	--	--	16,273	[11]	16,273	N/A	--	--	--
\$250,000 under \$1,000,000	230	--	229	N/A	--	--	1	25,622	--	25,622	N/A	--	--	[11]
\$1,000,000 under \$5,000,000	300	--	300	N/A	--	--	--	46,107	--	46,107	N/A	--	--	--
\$5,000,000 under \$10,000,000	102	4	98	N/A	--	--	--	20,161	30	20,131	N/A	--	--	--
\$10,000,000 under \$50,000,000	206	15	191	N/A	--	--	--	153,792	13,276	140,516	N/A	--	--	--
\$50,000,000 under \$100,000,000	75	5	70	N/A	--	--	--	56,942	7,697	49,245	N/A	--	--	--
\$100,000,000 under \$250,000,000	116	22	94	N/A	--	--	--	178,781	41,889	136,872	N/A	--	--	--
\$250,000,000 or more	707	567	140	N/A	--	--	--	10,011,876	9,464,756	547,120	N/A	--	--	--
Form 1120F returns [10]	24	13	11	N/A	--	--	--	9,013	4,846	4,167	N/A	--	--	--
Estate and trust income tax returns	466	1	462	N/A	--	--	3	46,775	[11]	44,100	N/A	--	--	2,675
Estate tax returns:														
Total	341	--	340	N/A	--	--	1	1,005,266	--	1,004,816	N/A	--	--	450
Size of gross estate:														
Under \$1,000,000	50	--	50	N/A	--	--	--	8,502	--	8,502	N/A	--	--	--
\$1,000,000 under \$5,000,000	178	--	178	N/A	--	--	--	263,231	--	263,231	N/A	--	--	--
\$5,000,000 or more	113	--	112	N/A	--	--	1	733,533	--	733,083	N/A	--	--	450
Gift tax returns	368	--	367	N/A	--	--	1	284,998	--	284,926	N/A	--	--	72
Employment tax returns	1,696	226	1,274	--	1	177	18	179,605	123,568	54,368	--	3	1,611	55
Excise tax returns [4]	1,390	290	1,100	--	--	--	--	63,091	27,672	35,419	--	--	--	--
Other taxable returns [9,12]	68	65	3	--	--	--	--	151,487	151,342	145	--	--	--	--

N/A - Not applicable.

[1] Comprises all returns except those of tax-exempt/government entity organizations, employee plans, and others mentioned in Table 10 (file Examination Coverage: Recommended and Average Recommended Additional Tax After Examination, by Type and Size of Return), footnote 13.

[2] CIC (Coordinated Industry Cases), formerly known as CEP (Coordinated Examination Program), covers "a taxpayer, and its effectively controlled entities, that warrants application of 'team examination' procedures."

Tax auditors are Compliance personnel who are required to have 9 semester hours of accounting and who perform examinations on selected individual, employment, and excise returns. Tax Compliance Officers (TCO) are Compliance personnel who are required to have 6 to 12 semester hours of accounting and who perform examinations on selected individual and business taxpayers involving complex tax issues. Tax examiners for field operations and Compliance Centers perform examinations on correspondence.

[3] Comprises work performed by revenue officer examiners. These examiners are employees who have been trained to do certain employment tax returns. Data are collected for these individuals and shown separately from other employment returns.

[4] Excludes excise tax returns filed with the Customs Service and Bureau of Alcohol, Tobacco and Firearms.

[5] Comprises returns shown as individual income tax, corporation income tax, estate and trust income tax, estate tax, and gift tax. Excludes returns shown as employment, excise, and other taxable returns.

[6] Form 1040A is one of the two IRS individual income tax return "short forms."

[7] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and, thus, excludes net losses. For example, it includes "business or profession net income," but not "business or profession net loss."

[8] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR (total gross receipts) is the sum of gross receipts from farm and nonfarm businesses. It is calculated by adding the positive values of gross receipts and other income from Schedule C to the cost of purchased items and gross income (can be positive or negative) from Schedule F.

[9] Forms 1120S are returns filed by qualifying corporations electing to be taxed through shareholders. Under certain conditions, some of these corporations are subject to tax and are included in "other taxable returns" in this table. Total for corporations also excludes certain other types of corporations, which are included in "other taxable returns," described in footnote 12, below.

[10] Forms 1120F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.

[11] Less than \$500.

[12] Includes Forms 1120S (for S corporations reporting a tax; see also footnote 9); 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); and certain other returns.

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

SOURCE: IRS Data Book, FY 2002, Publication 555. Also, Small Business/Self-Employed, Compliance Policy, Centralized Workload Selection and Delivery, Examination Management Information Systems and Automation S-C-CP-CW-EMIS

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax**

**After Examination, by Type and Size of Return, Fiscal Year 2001**

[Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined [1]					Amount unagreed				
	Total [2]	Revenue agent		Tax auditor [3,5]	Compliance center [3]	Total [2]	Revenue agent		Tax auditor [3,5]	Compliance center [3]
		CEP [3]	Non-CEP [3,4]				CEP [3]	Non-CEP [3,4]		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>United States, total [6]</b>	<b>25,371</b>	<b>1,013</b>	<b>12,505</b>	<b>7,085</b>	<b>4,768</b>	<b>12,294,484</b>	<b>9,646,122</b>	<b>2,540,101</b>	<b>80,619</b>	<b>27,642</b>
Income, estate, and gift tax, total	22,592	643	10,486	6,697	4,766	11,853,671	9,377,480	2,374,668	73,881	27,642
Individual income tax returns, total	18,907	32	7,428	6,697	4,750	838,535	6,228	730,998	73,881	27,428
Nonbusiness returns:										
Forms 1040A with TPI under \$25,000 [7,8]	3,776	--	535	827	2,414	91,829	--	77,411	5,118	9,300
All other returns by size of TPI: [8]										
Under \$25,000	1,418	--	445	481	492	36,635	--	29,169	3,286	4,180
\$25,000 under \$50,000	2,559	--	732	1,370	457	32,644	--	23,350	7,092	2,202
\$50,000 under \$100,000	2,564	--	881	1,315	368	59,589	--	40,740	16,261	2,588
\$100,000 or more	3,304	27	2,244	839	194	382,412	6,064	350,305	20,814	5,229
Business returns:										
Schedule C returns by size of TGR: [9]										
Under \$25,000	1,161	--	218	409	534	10,933	--	7,650	2,037	1,246
\$25,000 under \$100,000	1,823	--	738	883	202	36,449	--	28,798	7,035	616
\$100,000 or more	2,164	--	1,536	551	77	168,454	--	154,356	12,072	2,026
Schedule F returns by size of TGR: [9]										
Under \$100,000	41	--	24	12	5	539	--	471	53	15
\$100,000 or more	97	5	75	10	7	19,051	164	18,748	113	26
Corporation income tax returns, except Form 1120S, total [10]	2,244	604	1,630	N/A	10	10,225,893	9,358,898	866,781	N/A	214
Returns other than Form 1120F: [11]										
No balance sheet returns	120	18	94	N/A	8	349,017	273,588	75,215	N/A	214
Balance sheet returns by size of total assets:										
Under \$250,000	285	--	284	N/A	1	32,083	--	32,083	N/A	[12]
\$250,000 under \$1,000,000	280	--	280	N/A	--	32,165	--	32,165	N/A	--
\$1,000,000 under \$5,000,000	310	2	308	N/A	--	49,325	17,709	31,616	N/A	--
\$5,000,000 under \$10,000,000	105	4	101	N/A	--	20,085	[12]	20,085	N/A	--
\$10,000,000 under \$50,000,000	254	8	246	N/A	--	124,387	4,285	120,102	N/A	--
\$50,000,000 under \$100,000,000	64	3	61	N/A	--	42,759	11,232	31,527	N/A	--
\$100,000,000 under \$250,000,000	115	15	100	N/A	--	80,165	4,875	75,290	N/A	--
\$250,000,000 or more	692	550	141	N/A	1	9,348,577	9,038,200	310,377	N/A	[12]
Form 1120F returns [11]	19	4	15	N/A	--	147,330	9,009	138,321	N/A	--
Estate and trust income tax returns	722	6	710	N/A	6	68,105	12,354	55,751	N/A	[12]
Estate tax returns:										
Total	350	1	349	N/A	--	467,794	[12]	467,794	N/A	--
Size of gross estate:										
Under \$1,000,000	77	1	76	N/A	--	81,029	[12]	81,029	N/A	--
\$1,000,000 under \$5,000,000	189	--	189	N/A	--	104,483	--	104,483	N/A	--
\$5,000,000 or more	84	--	84	N/A	--	282,282	--	282,282	N/A	--
Gift tax returns	369	--	369	N/A	--	253,344	--	253,344	N/A	--
Employment tax returns	1,575	157	1,393	23	2	271,989	225,898	45,845	246	[12]
Employment revenue officer examiners [13]	170	--	--	170	--	4,489	--	--	4,489	--
Excise tax returns [6]	785	179	606	--	--	111,633	2,741	108,892	--	--
Other taxable returns [10,14]	47	34	13	--	--	50,596	40,003	10,593	--	--

N/A - Not applicable.

[1] Comprises all returns except those of tax-exempt/government entity organizations, employee plans, and others mentioned in Table 10, file 01db10ex.xls, footnote 14.

[2] Included in the grand total, but not in the detail, are 202 returns with \$2,106,000 in unagreed additional tax that were examined by tax examiners.

[3] CEP (Coordinated Examination Program) covers "a taxpayer, and its effectively controlled entities, that warrants application of 'team examination' procedures." Tax auditors are Compliance personnel who are required to have 9 semester hours of accounting and who perform examinations on selected individual, employment and excise returns. Tax examiners for field operations and Compliance Centers perform examinations on correspondence.

[4] Included in the grand total for revenue agents (non-CEP), but not in the detail, are 7 returns with \$103,000 in unagreed additional tax that were examined by tax examiners.

[5] Included in the grand total for tax auditors, but not in the detail, are 195 returns with \$2,003,000 in unagreed additional tax that were examined by tax examiners.

[6] Excludes excise tax returns filed with the Customs Service and Bureau of Alcohol, Tobacco and Firearms.

[7] Form 1040A is one of the two IRS individual income tax return "short forms."

[8] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and, thus, excludes net losses. For example, it includes "business or profession net income," but not "business or profession net loss."

[9] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR stands for "total gross receipts."

[10] Forms 1120S are returns filed by qualifying corporations electing to be taxed through shareholders. Under certain conditions, some of these corporations are subject to tax and are included in "other taxable returns" in this table. Total for corporations also excludes certain other types of corporations, which are included in "other taxable returns," described in footnote 14, below.

[11] Forms 1120F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.

[12] Less than \$500.

[13] Comprises work performed by a revenue officer examiner. Revenue officer examiners are employees who have been trained to do certain employment tax returns. Data are collected for these individuals and shown separately from employment returns.

[14] Includes Forms 1120S (for S corporations reporting a tax; see also footnote 10); 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); and certain other returns.

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

SOURCE: IRS Data Book, FY 2001, Publication 55b. Also, Small Business/Self-Employed, Compliance Policy, Centralized Workload Selection and Delivery, Examination Management Information, System and Automation S.C:CP:CW:EMIS

**Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 2000**  
 [Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined [1]					Amount unagreed				
	Total [2]	Revenue agent		Tax auditor [3.5]	Compliance center [3]	Total [2]	Revenue agent		Tax auditor [3.5]	Compliance center [3]
		CEP [3]	Non-CEP [3.4]				CEP [3]	Non-CEP [3.4]		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>United States, total [6]</b>	<b>28,793</b>	<b>1,076</b>	<b>15,813</b>	<b>8,808</b>	<b>3,096</b>	<b>9,578,792</b>	<b>6,451,183</b>	<b>3,012,743</b>	<b>89,119</b>	<b>25,747</b>
Income, estate, and gift tax, total	25,273	675	13,326	8,176	3,096	9,289,371	6,252,343	2,929,688	81,593	25,747
Individual income tax returns, total	20,567	21	9,285	8,176	3,085	994,905	12,215	875,425	81,593	25,672
Nonbusiness returns:										
Forms 1040A with TPI under \$25,000 [7,8]	3,081	--	559	920	1,602	26,615	--	10,220	5,178	11,217
All other returns by size of TPI: [8]										
Under \$25,000	1,487	--	607	583	297	35,464	--	26,961	3,730	4,773
\$25,000 under \$50,000	2,659	--	822	1,621	216	43,554	--	34,453	8,350	751
\$50,000 under \$100,000	3,206	--	1,059	1,943	204	50,010	--	37,677	11,583	750
\$100,000 or more	4,161	16	2,808	1,107	230	506,723	9,140	466,627	24,659	6,297
Business returns:										
Schedule C returns by size of TGR: [9]										
Under \$25,000	1,232	--	402	435	395	13,255	--	9,794	2,728	733
\$25,000 under \$100,000	1,958	--	868	1,014	76	39,248	--	27,816	11,117	315
\$100,000 or more	2,540	2	1,949	533	56	258,225	39	244,178	13,178	830
Schedule F returns by size of TGR: [9]										
Under \$100,000	62	--	51	8	3	918	--	835	80	3
\$100,000 or more	181	3	160	12	6	20,893	3,036	16,864	990	3
Corporation income tax returns, except Form 1120S, total [10]	3,183	653	2,523	N/A	7	7,078,663	6,229,959	848,660	N/A	44
Returns other than Form 1120F: [11]										
No balance sheet returns	159	8	148	N/A	3	67,831	35,517	32,270	N/A	44
Balance sheet returns by size of total assets:										
Under \$250,000	527	1	524	N/A	2	29,024	70	28,954	N/A	--
\$250,000 under \$1,000,000	428	3	423	N/A	2	176,400	29	176,371	N/A	--
\$1,000,000 under \$5,000,000	487	13	474	N/A	--	70,605	876	69,729	N/A	--
\$5,000,000 under \$10,000,000	200	4	196	N/A	--	30,448	912	29,536	N/A	--
\$10,000,000 under \$50,000,000	354	13	341	N/A	--	146,104	10,856	135,248	N/A	--
\$50,000,000 under \$100,000,000	132	18	114	N/A	--	74,646	16,269	58,377	N/A	--
\$100,000,000 under \$250,000,000	173	43	130	N/A	--	127,872	21,417	106,455	N/A	--
\$250,000,000 or more	694	533	161	N/A	--	6,223,882	6,049,786	174,096	N/A	--
Form 1120F returns [11]	29	17	12	N/A	--	131,851	94,227	37,624	N/A	--
Estate and trust income tax returns	805	--	803	N/A	2	204,075	--	204,075	N/A	--
Estate tax returns:										
Total	376	1	373	N/A	2	630,378	10,169	620,178	N/A	31
Size of gross estate:										
Under \$1,000,000	86	--	85	N/A	1	20,579	--	20,548	N/A	31
\$1,000,000 under \$5,000,000	203	--	202	N/A	1	115,352	--	115,352	N/A	--
\$5,000,000 or more	87	1	86	N/A	--	494,447	10,169	484,278	N/A	--
Gift tax returns	342	--	342	N/A	--	381,350	--	381,350	N/A	--
Employment tax returns	1,985	234	1,675	76	--	228,606	182,313	46,160	133	--
Employment revenue officer examiners [12]	283	--	--	283	--	2,963	--	--	2,963	--
Excise tax returns [6]	918	120	798	--	--	43,193	6,662	36,531	--	--
Other taxable returns [10,13]	53	47	6	--	--	10,001	9,865	136	--	--

N/A - Not applicable.

[1] Comprises all returns except those of tax-exempt/government entity organizations, employee plans, and others shown as nontaxable in Table 10, file 00db10ex.xls, or mentioned in footnote 13, Table 10, file 00db10ex.xls.

[2] Included in the grand total, but not in the detail, are 281 returns with \$4,658,000 in unagreed additional tax that were examined by tax examiners.

[3] CEP (Coordinated Examination Program) covers "a taxpayer, and its effectively controlled entities, that warrants application of 'team examination' procedures." Tax auditors are Compliance personnel who are required to have nine hours of accounting and who perform examinations on selected returns. Tax examiners are Compliance personnel who perform examinations on certain returns. Compliance center personnel are also tax examiners who perform correspondence examinations.

[4] Included in the grand total for revenue agents (non-CEP), but not in the detail, are 8 returns with \$228,000 in unagreed additional tax that were examined by tax examiners.

[5] Included in the grand total for tax auditors, but not in the detail, are 273 returns with \$4,430,000 in unagreed additional tax that were examined by tax examiners.

[6] Excludes excise tax returns filed with the Customs Service and Bureau of Alcohol, Tobacco and Firearms.

[7] Form 1040A is one of the two IRS individual income tax return "short forms."

[8] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and, thus, excludes net losses. For example, it includes "business or profession net income," but not "business or profession net loss."

[9] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR stands for "total gross receipts."

[10] Forms 1120S are returns filed by qualifying corporations electing to be taxed through shareholders. Under certain conditions, some of these corporations were subject to tax and are included in "other taxable returns" in this table. Total for corporations also excludes certain other types of corporations, which are included in "other taxable returns," described in footnote 13, below.

[11] Forms 1120F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.

[12] Comprises work performed by a revenue officer examiner. (Revenue officer examiners were transferred to the examination function from the collection function in 1996; therefore, examination data for them are only available starting with that year.)

[13] Includes Forms 1120S (for S corporations reporting a tax; see also footnote 10); 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); and certain other returns.

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

SOURCE: 2000 IRS Data Book, Publication 55b. Also Small Business/Self-Employed, Compliance Policy, Centralized Workload Selection and Delivery, Examination Management Information, System and Automation S:C:CP:EW:EMIS.

**1999 Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax**  
**After Examination, by Type and Size of Return, Fiscal Year 1999**  
 [Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined [1]					Amount unagreed				
	Total [2]	Revenue agent		Tax auditor [5]	Service center	Total [2]	Revenue agent		Tax auditor [5]	Service center
		CEP [3]	Non-CEP [3,4]				CEP [3]	Non-CEP [3,4]		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>United States, total [6]</b>	<b>43,452</b>	<b>1,159</b>	<b>22,101</b>	<b>12,686</b>	<b>7,506</b>	<b>11,761,372</b>	<b>8,638,841</b>	<b>2,981,163</b>	<b>112,717</b>	<b>28,650</b>
Income, estate, and gift tax, total	38,024	839	18,046	11,635	7,504	11,450,390	8,461,321	2,860,215	100,204	28,650
Individual income tax returns, total	31,980	34	12,818	11,635	7,493	1,081,499	41,373	911,563	100,204	28,359
Nonbusiness returns:										
Forms 1040A with TPI under \$25,000 [7,8]	7,719	--	776	1,522	5,421	54,785	--	24,824	8,836	21,125
All other returns by size of TPI: [8]										
Under \$25,000	2,227	1	724	891	611	45,807	30	37,663	6,358	1,756
\$25,000 under \$50,000	4,439	--	1,714	2,202	523	46,909	--	34,523	10,563	1,823
\$50,000 under \$100,000	4,392	1	1,493	2,714	184	52,676	241	36,581	15,285	569
\$100,000 or more	5,198	25	3,700	1,327	146	546,906	38,613	482,161	24,990	1,142
Business returns:										
Schedule C returns by size of TGR: [9]										
Under \$25,000	1,520	--	386	733	401	17,706	--	12,360	4,395	951
\$25,000 under \$100,000	2,595	2	1,033	1,428	132	42,888	170	27,954	14,097	667
\$100,000 or more	3,623	5	2,798	755	65	240,453	2,319	222,993	14,829	312
Schedule F returns by size of TGR: [9]										
Under \$100,000	105	--	63	37	5	2,209	--	1,724	473	12
\$100,000 or more	162	--	131	26	5	31,160	--	30,780	378	2
Corporation income tax returns, except Form 1120S, total [10]	4,490	799	3,685	N/A	6	9,399,449	8,401,129	998,315	N/A	5
Returns other than Form 1120F: [11]										
No balance sheet returns	206	15	189	N/A	2	101,049	78,920	22,124	N/A	5
Balance sheet returns by size of total assets:										
Under \$250,000	718	2	715	N/A	1	48,518	10,915	37,603	N/A	--
\$250,000 under \$1,000,000	672	--	672	N/A	--	43,333	--	43,333	N/A	--
\$1,000,000 under \$5,000,000	859	5	854	N/A	--	112,990	351	112,639	N/A	--
\$5,000,000 under \$10,000,000	289	4	285	N/A	--	73,337	4,774	68,563	N/A	--
\$10,000,000 under \$50,000,000	425	13	412	N/A	--	207,561	17,804	189,757	N/A	--
\$50,000,000 under \$100,000,000	169	22	147	N/A	--	126,500	21,944	104,556	N/A	--
\$100,000,000 under \$250,000,000	215	27	188	N/A	--	223,115	46,847	176,268	N/A	--
\$250,000,000 or more	896	706	187	N/A	3	8,435,807	8,213,656	222,151	N/A	--
Form 1120F returns [11]	41	5	36	N/A	--	27,239	5,918	21,321	N/A	--
Estate and trust income tax returns	663	5	655	N/A	3	65,982	18,685	47,297	N/A	--
Estate tax returns:										
Total	504	--	502	N/A	2	627,042	--	626,756	N/A	286
Size of gross estate:										
Under \$1,000,000	135	--	134	N/A	1	51,318	--	51,311	N/A	7
\$1,000,000 under \$5,000,000	258	--	257	N/A	1	110,758	--	110,479	N/A	279
\$5,000,000 or more	111	--	111	N/A	--	464,966	--	464,966	N/A	--
Gift tax returns	387	1	386	N/A	--	276,418	134	276,284	N/A	--
Employment tax returns	3,287	172	3,065	48	2	217,132	129,277	87,635	220	--
Employment revenue officer examiners [12]	482	--	--	482	--	7,724	--	--	7,724	--
Excise tax returns [6]	1,106	135	971	--	--	68,456	35,941	32,515	--	--
Other taxable returns [10,13]	29	13	16	--	--	13,091	12,302	789	--	--

N/A - Not applicable.

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

[1] The following returns are nontaxable: Form 1120-DISC (domestic international sales corporations); Form 1120-IC-DISC (interest-charge domestic international sales corporations); Form 1066 (real estate mortgage investment conduits); and certain other returns.

[2] Included in the grand total, but not in the detail, are 524 returns with \$4,579,000 in unagreed additional tax that were examined by tax examiners.

[3] CEP (Coordinated Examination Program) covers "a taxpayer, and its effectively controlled entities, that warrants application of 'team examination' procedures."

[4] Included in the grand total for revenue agents (non-CEP), but not in the detail, are 3 returns with \$9,000 in unagreed additional tax that were examined by tax examiners.

[5] Included in the grand total for tax auditors, but not in the detail, are 521 returns with \$4,569,000 in unagreed additional tax that were examined by tax examiners.

[6] Excludes excise tax returns filed with the Customs Service and Bureau of Alcohol, Tobacco and Firearms.

[7] Form 1040A is one of the two IRS individual income tax return "short forms."

[8] TPI (total positive income) is, in general, the sum of all positive amounts shown for the various sources of income reported on the individual income tax return, and, thus, excludes net losses. For example, it includes "business or profession net income," but not "business or profession net loss."

[9] Schedule C returns are filed by nonfarm sole proprietors. Schedule F returns are filed by farm sole proprietors. TGR stands for "total gross receipts."

[10] Forms 1120S are returns filed by qualifying corporations electing to be taxed through shareholders. Under certain conditions, some of these corporations were subject to tax and are included in "other taxable returns" in this table. Total for corporations also excludes certain other types of corporations, which are included in "other taxable returns."

[11] Forms 1120F are returns filed by foreign corporations with U.S. income, other than foreign life insurance companies and foreign sales corporations.

[12] Comprises work performed by a revenue officer examiner. (Revenue officer examiners were transferred to the examination function from the collection function in 1996; therefore, examination data for them are only available starting with that year.)

[13] Includes Forms 1120S (for S corporations reporting a tax; see also footnote 10); 1120-FSC (foreign sales corporations); 8288 (withholding tax returns for disposition by foreign persons of U.S. property interests); and certain other returns.

SOURCE: 1999 IRS Data Book, Publication 55b.

**1998 Examination Coverage: Returns Examined with Unagreed Recommended Additional Tax After Examination, by Type and Size of Return, Fiscal Year 1998**  
 [Money amounts are in thousands of dollars]

Type and size of return	Taxable returns examined <sup>1</sup>					Amount unagreed				
	Total	Revenue agent		Tax auditor	Service center	Total	Revenue agent		Tax auditor	Service center
		CEP	Non-CEP				CEP	Non-CEP		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	
<b>United States, total</b>	<b>61,740</b>	<b>1,393</b>	<b>33,078</b>	<b>21,771</b>	<b>5,498</b>	<b>14,479,810</b>	<b>9,532,105</b>	<b>4,697,276</b>	<b>191,845</b>	<b>58,584</b>
Income, estate, and gift tax, total	52,746	818	26,080	20,365	5,483	13,705,729	9,069,611	4,403,516	174,096	58,506
Individual income tax returns, total	44,434	55	18,549	20,365	5,465	1,624,498	28,769	1,363,194	174,096	58,438
Nonbusiness returns:										
Forms 1040A with TPI under \$25,000	7,567	--	1,208	2,885	3,474	100,994	--	43,014	18,908	39,072
All other returns by size of TPI:										
Under \$25,000	3,212	1	1,160	1,534	517	62,509	88	50,819	7,510	4,091
\$25,000 under \$50,000	6,391	1	1,608	4,355	427	83,004	131	57,744	18,966	6,162
\$50,000 under \$100,000	7,090	1	2,042	4,785	262	94,281	38	65,170	27,212	1,862
\$100,000 or more	8,045	36	5,562	2,090	357	756,932	21,326	689,190	41,852	4,564
Business returns:										
Schedule C returns by size of TGR:										
Under \$25,000	2,185	--	742	1,257	186	39,511	--	28,715	9,977	820
\$25,000 under \$100,000	4,137	--	1,661	2,331	145	71,674	--	46,239	24,712	723
\$100,000 or more	5,342	10	4,186	1,063	83	371,101	6,305	339,192	24,513	1,091
Schedule F returns by size of TGR:										
Under \$100,000	163	--	105	49	9	3,489	--	3,136	309	43
\$100,000 or more	302	6	275	16	5	41,003	881	39,975	137	10
Corporation income tax returns, except Form 1120S, total	6,737	757	5,974	N/A	6	10,676,958	9,040,842	1,636,069	N/A	48
Returns other than Form 1120F:										
No balance sheet returns	337	21	314	N/A	2	95,784	61,401	34,375	N/A	8
Balance sheet returns by size of total assets:										
Under \$250,000	1,347	3	1,342	N/A	2	54,543	--	54,541	N/A	2
\$250,000 under \$1,000,000	1,160	1	1,157	N/A	2	90,893	90	90,765	N/A	38
\$1,000,000 under \$5,000,000	1,208	2	1,206	N/A	--	142,963	108	142,856	N/A	--
\$5,000,000 under \$10,000,000	485	6	479	N/A	--	97,472	3,089	94,383	N/A	--
\$10,000,000 under \$50,000,000	833	8	825	N/A	--	338,585	4,956	333,629	N/A	--
\$50,000,000 under \$100,000,000	246	10	236	N/A	--	255,949	69,519	186,430	N/A	--
\$100,000,000 under \$250,000,000	194	33	161	N/A	--	407,834	223,815	184,019	N/A	--
\$250,000,000 or more	887	666	221	N/A	--	9,175,864	8,670,942	504,922	N/A	--
Form 1120F returns	40	7	33	N/A	--	17,071	6,922	10,149	N/A	--
Estate and trust income tax returns	446	6	428	N/A	12	65,136	--	65,116	N/A	20
Estate tax returns:										
Total	640	--	640	N/A	--	1,040,701	--	1,040,701	N/A	--
Size of gross estate:										
Under \$1,000,000	161	--	161	N/A	--	31,753	--	31,753	N/A	--
\$1,000,000 under \$5,000,000	348	--	348	N/A	--	124,434	--	124,434	N/A	--
\$5,000,000 or more	131	--	131	N/A	--	884,514	--	884,514	N/A	--
Gift tax returns	489	--	489	N/A	--	298,436	--	298,436	N/A	--
Employment tax returns	5,370	307	4,866	182	15	399,259	246,040	151,894	1,247	78
Employment revenue officer examiner	741	--	--	741	--	13,116	--	--	13,116	--
Excise tax returns	2,314	224	2,090	--	--	213,570	116,837	96,733	--	--
Other taxable returns	79	44	35	--	--	144,479	99,617	44,862	--	--

See notes and footnotes following the last table.

**Examined Returns Involving Unagreed Recommended Additional Tax and Penalties (1997)**

September 28, 1996 - September 26, 1997

	Returns					Amount Unagreed (in thousands of dollars)				
	Revenue Agent		Tax Auditor	Service Center	Total	Revenue Agent		Tax Auditor	Service Center	Total
	Non CEP	CEP				Non CEP	CEP			
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)
<b>Grand Total</b>	<b>42,572</b>	<b>1,852</b>	<b>30,106</b>	<b>7,744</b>	<b>82,274</b>	<b>5,642,478</b>	<b>10,764,280</b>	<b>292,664</b>	<b>58,457</b>	<b>16,757,878</b>
<b>Income, Estate &amp; Gift, Total**</b>	<b>33,314</b>	<b>1,030</b>	<b>28,475</b>	<b>7,701</b>	<b>70,520</b>	<b>5,228,407</b>	<b>10,116,477</b>	<b>273,820</b>	<b>58,405</b>	<b>15,677,109</b>
<b>Individual, Total**</b>	<b>24,615</b>	<b>87</b>	<b>28,475</b>	<b>7,669</b>	<b>60,846</b>	<b>1,833,041</b>	<b>171,564</b>	<b>273,820</b>	<b>57,926</b>	<b>2,336,351</b>
1040A, TPI < \$25,000	1,822	--	3,701	3,993	9,516	73,704	--	31,259	28,870	133,833
Non 1040A, TPI < \$25,000	1,591	1	2,181	850	4,623	61,623	112	12,057	9,335	83,128
TPI \$25,000 < \$50,000	2,447	--	6,087	703	9,237	215,904	--	31,022	5,244	252,170
TPI \$50,000 < \$100,000	2,996	2	6,394	598	9,990	87,151	184	39,732	2,310	129,376
TPI \$100,000 and over	6,495	65	3,298	638	10,496	655,368	50,014	66,064	7,316	778,762
Sch C-TGR < \$25,000	1,049	1	1,856	324	3,230	129,991	7	14,335	1,452	145,786
Sch C-TGR \$25,000 < \$100,000	2,419	--	3,537	299	6,255	57,271	--	38,629	1,391	97,291
Sch C-TGR \$100,000 and over	5,288	15	1,296	226	6,825	498,497	120,912	38,312	1,898	659,618
Sch F-TGR < \$100,000	140	--	77	11	228	2,806	--	669	38	3,512
Sch F-TGR \$100,000 and over	368	3	48	27	446	50,726	335	1,741	73	52,875
<b>Corporation, Total**</b>	<b>7,274</b>	<b>911</b>	<b>--</b>	<b>23</b>	<b>8,208</b>	<b>2,197,882</b>	<b>9,837,883</b>	<b>--</b>	<b>211</b>	<b>12,035,976</b>
No Balance Sheet	380	13	--	8	401	32,047	24,813	--	184	57,045
Under \$250,000	1,807	2	--	12	1,821	86,033	368	--	23	86,424
\$250,000 < \$1 Mil	1,508	1	--	1	1,510	124,251	10	--	5	124,265
\$1 Mil < \$5 Mil	1,552	14	--	--	1,566	199,420	5,167	--	--	204,588
\$5 Mil < \$10 Mil	462	5	--	--	467	84,373	629	--	--	85,002
\$10 Mil < \$50 Mil	777	27	--	--	804	356,704	24,148	--	--	380,852
\$50 Mil < \$100 Mil	235	21	--	--	256	116,910	36,898	--	--	153,808
\$100 Mil < \$250 Mil	245	55	--	--	300	301,082	79,929	--	--	381,011
\$250 Mil and over	269	754	--	2	1,025	729,784	9,617,317	--	--	10,347,101
Form 1120F	39	19	--	--	58	167,277	48,604	--	--	215,881
<b>Fiduciary**</b>	<b>254</b>	<b>22</b>	<b>--</b>	<b>6</b>	<b>282</b>	<b>32,521</b>	<b>1,040</b>	<b>--</b>	<b>64</b>	<b>33,625</b>
<b>Estate, Total**</b>	<b>791</b>	<b>--</b>	<b>--</b>	<b>3</b>	<b>794</b>	<b>951,334</b>	<b>--</b>	<b>--</b>	<b>203</b>	<b>951,538</b>
Gross Estate < \$1 Mil	192	--	--	2	194	40,295	--	--	70	40,365
Gross Estate \$1 Mil < \$5 Mil	447	--	--	1	448	174,952	--	--	134	175,086
Gross Estate \$5 Mil and over	152	--	--	--	152	736,086	--	--	--	736,086
<b>Gift**</b>	<b>380</b>	<b>10</b>	<b>--</b>	<b>--</b>	<b>390</b>	<b>213,630</b>	<b>105,990</b>	<b>--</b>	<b>--</b>	<b>319,620</b>
<b>Employment</b>	<b>7,571</b>	<b>469</b>	<b>355</b>	<b>43</b>	<b>8,438</b>	<b>242,290</b>	<b>357,440</b>	<b>1,152</b>	<b>53</b>	<b>600,935</b>
<b>Employment ROE ***</b>	<b>--</b>	<b>--</b>	<b>1,276</b>	<b>--</b>	<b>1,276</b>	<b>--</b>	<b>--</b>	<b>17,692</b>	<b>--</b>	<b>17,692</b>
<b>Excise</b>	<b>1,656</b>	<b>324</b>	<b>--</b>	<b>--</b>	<b>1,980</b>	<b>167,824</b>	<b>280,209</b>	<b>--</b>	<b>--</b>	<b>448,034</b>
<b>Miscellaneous Taxable</b>	<b>31</b>	<b>29</b>	<b>--</b>	<b>--</b>	<b>60</b>	<b>3,956</b>	<b>10,153</b>	<b>--</b>	<b>--</b>	<b>14,109</b>

[1] Miscellaneous taxable includes the following:

- a. Taxable 1120S Corporations
- b. 1120FSC (Foreign Sales Corporations); and
- c. FIRPTA (U.S. Withholding Tax Return for Disposition by Foreign Persons of U.S. Property Interests, Form 8288).

[2] Reserved.

[3] Lines marked with \*\* are included in the line titles: Income, Estate & Gift, Total.

[4] Dashes (-) in these tables indicate either information is not applicable for that particular class of return or no returns were examined for that particular class of return.

[5] All dollar figures are reported in thousands of dollars.

[6] Employment ROE \*\*\* -- This is Revenue Officer Examiner data (1996 and forward) included in Tax Auditor Numbers and is included in the Grand Total Line.

[7] Reserved.

[8] CEP: Coordinated Examination Program

TGR: Total Gross Receipts

TPI: Total Positive Income

Source: 1997 Internal Revenue Service Data Book, Publication 55B.

Examined Returns Involving Unagreed Recommended Additional Tax and Penalties (1996)  
September 30, 1995 - September 27, 1996

	Returns					Amount Unagreed (in thousands of dollars)				
	.....Revenue Agent.....					.....Revenue Agent.....				
	Non CEP	CEP	Tax Auditor	Service Center	Total	Non CEP	CEP	Tax Auditor	Service Center	Total
[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	
<b>Grand Total</b>	<b>41,089</b>	<b>1,504</b>	<b>29,750</b>	<b>8,963</b>	<b>81,306</b>	<b>4,708,824</b>	<b>12,591,779</b>	<b>266,249</b>	<b>62,673</b>	<b>17,629,525</b>
<b>Income, Estate &amp; Gift, Total**</b>	<b>31,579</b>	<b>914</b>	<b>27,764</b>	<b>8,960</b>	<b>69,217</b>	<b>4,333,441</b>	<b>12,353,430</b>	<b>242,158</b>	<b>62,662</b>	<b>16,991,692</b>
<b>Individual, Total**</b>	<b>24,236</b>	<b>74</b>	<b>27,764</b>	<b>8,942</b>	<b>61,016</b>	<b>1,516,609</b>	<b>178,936</b>	<b>242,158</b>	<b>62,381</b>	<b>2,000,085</b>
1040A, TPI < \$25,000	3,008	—	4,016	4,207	11,231	100,735	—	33,015	24,304	158,053
Non 1040A, TPI < \$25,000	1,605	—	2,346	833	4,784	39,156	—	13,060	8,772	60,987
TPI \$25,000 < \$50,000	2,538	—	6,697	1,023	10,258	56,750	—	32,555	2,543	91,847
TPI \$50,000 < \$100,000	2,756	—	6,934	827	10,517	77,859	—	41,062	3,140	122,062
TPI \$100,000 and over	5,680	48	3,163	734	9,625	760,402	65,390	58,210	12,679	896,682
Sch C-TGR < \$25,000	1,281	—	1,244	535	3,060	26,573	—	9,679	4,274	40,526
Sch C-TGR \$25,000 < \$100,000	2,568	—	2,257	449	5,274	56,220	—	24,872	2,160	83,252
Sch C-TGR \$100,000 and over	4,284	23	967	277	5,551	352,130	111,614	28,236	4,297	496,276
Sch F-TGR < \$100,000	139	—	80	22	241	4,314	—	442	58	4,815
Sch F-TGR \$100,000 and over	377	3	60	35	475	42,470	1,931	1,028	155	45,585
<b>Corporation, Total**</b>	<b>6,092</b>	<b>835</b>	<b>—</b>	<b>15</b>	<b>6,942</b>	<b>2,043,738</b>	<b>12,057,745</b>	<b>—</b>	<b>123</b>	<b>14,101,606</b>
No Balance Sheet	349	19	—	9	377	39,686	250,847	—	28	290,561
Under \$250,000	1,369	—	—	4	1,373	60,871	—	—	20	60,891
\$250,000 < \$1 Mil	1,082	2	—	1	1,085	97,745	—	—	74	97,819
\$1 Mil < \$5 Mil	1,222	5	—	—	1,227	172,091	755	—	—	172,845
\$5 Mil < \$10 Mil	449	1	—	—	450	133,159	—	—	—	133,159
\$10 Mil < \$50 Mil	768	33	—	—	801	334,948	25,670	—	—	360,618
\$50 Mil < \$100 Mil	256	22	—	—	278	187,867	32,822	—	—	220,689
\$100 Mil < \$250 Mil	248	85	—	—	333	320,058	556,593	—	—	876,650
\$250 Mil and over	286	660	—	1	947	636,238	11,146,177	—	—	11,782,415
Form 1120F	63	8	—	—	71	61,077	44,882	—	—	105,959
<b>Fiduciary**</b>	<b>177</b>	<b>4</b>	<b>—</b>	<b>3</b>	<b>184</b>	<b>6,679</b>	<b>907</b>	<b>—</b>	<b>158</b>	<b>7,743</b>
<b>Estate, Total**</b>	<b>730</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>730</b>	<b>583,834</b>	<b>—</b>	<b>—</b>	<b>—</b>	<b>583,834</b>
Gross Estate < \$1 Mil	187	—	—	—	187	39,976	—	—	—	39,976
Gross Estate \$1 Mil < \$5 Mil	416	—	—	—	416	211,829	—	—	—	211,829
Gross Estate \$5 Mil and over	127	—	—	—	127	332,029	—	—	—	332,029
<b>Gift**</b>	<b>344</b>	<b>1</b>	<b>—</b>	<b>—</b>	<b>345</b>	<b>182,581</b>	<b>115,843</b>	<b>—</b>	<b>—</b>	<b>298,424</b>
<b>Employment</b>	<b>7,491</b>	<b>403</b>	<b>494</b>	<b>2</b>	<b>8,390</b>	<b>208,992</b>	<b>177,906</b>	<b>1,997</b>	<b>—</b>	<b>388,895</b>
<b>Employment ROE *** [1]</b>	<b>—</b>	<b>—</b>	<b>1,479</b>	<b>—</b>	<b>1,479</b>	<b>—</b>	<b>—</b>	<b>22,084</b>	<b>—</b>	<b>22,084</b>
<b>Excise</b>	<b>1,978</b>	<b>164</b>	<b>13</b>	<b>—</b>	<b>2,155</b>	<b>114,050</b>	<b>44,700</b>	<b>10</b>	<b>—</b>	<b>158,760</b>
<b>Miscellaneous Taxable [2]</b>	<b>41</b>	<b>23</b>	<b>—</b>	<b>1</b>	<b>65</b>	<b>52,342</b>	<b>15,742</b>	<b>—</b>	<b>11</b>	<b>68,095</b>

\*\*\* This is an analysis of work performed by an ROE.

Lines marked with \*\* are included in the line titles: Income, Estate & Gift Total.

Dashes (—) in these tables indicate either information is not applicable for that particular class of return or no returns were examined for that particular class of return.

All dollar figures are reported in thousands of dollars.

CEP: Coordinated Examination Program

TGR: Total Gross Receipts

TPI: Total Positive Income

[1] Employment ROE \*\*\* — This is Revenue Officer Examiner data (1996 and forward) included in Tax Auditor Numbers and is included in the Grand Total Line.

[2] Miscellaneous taxable includes the following:

- Taxable 1120S Corporations
- 1120FSC (Foreign Sales Corporations)
- FIRPTA (U.S. Withholding Tax Return for Disposition by Foreign Persons of U.S. Property Interests, Form 8288)
- Annual Return for Partnership Withholding Tax, Form 8804.

SOURCE: Internal Revenue Service, 1996 Annual Data Book, Publication 55B.



**Examined Returns Involving Unagreed Recommended Additional Tax and Penalties (1995)**  
**October, 1994 - September 30, 1995**

	Amount Unagreed									
	Returns					(in thousands of dollars)				
	Non CEP		Tax Auditor	Service Center	Total	Non CEP		Tax Auditor	Service Center	Total
Grand Total	37,859	1,500	22,018	6,859	68,236	5,203,329	11,623,885	209,071	50,753	17,087,038
Income, Estate & Gift, Total**	27,632	976	21,334	6,854	56,796	4,811,445	11,359,646	207,850	50,753	16,429,694
Individual, Total**	20,742	74	21,334	6,835	48,985	1,830,937	35,176	207,850	50,620	2,124,584
1040A, TPI < \$25,000	3,713	1	3,847	2,794	10,355	242,040	16	33,976	14,710	290,743
Non 1040A, TPI < \$25,000	1,417	2	1,883	860	4,162	356,883	14	9,783	5,156	371,837
TPI \$25,000 < \$50,000	1,908	-	4,688	706	7,302	42,006	-	23,942	3,023	68,972
TPI \$50,000 < \$100,000	2,116	-	4,322	686	7,124	52,924	-	29,560	3,830	86,314
TPI \$100,000 and over	4,554	50	2,213	732	7,549	676,612	28,400	48,402	11,812	765,225
Sch C-TGR < \$25,000	1,289	1	1,373	420	3,083	23,100	-	12,081	7,198	42,380
Sch C-TGR \$25,000 < \$100,000	2,059	-	1,927	306	4,292	47,457	-	22,974	1,485	71,916
Sch C-TGR \$100,000 and over	3,310	19	939	284	4,552	368,063	6,104	25,249	3,120	402,536
Sch F-TGR < \$100,000	134	-	94	23	251	3,015	-	916	193	4,124
Sch F-TGR \$100,000 and over	242	1	48	24	315	18,836	642	966	93	20,537
Corporation, Total**	5,760	885	-	19	6,664	2,316,506	11,277,963	-	133	13,594,603
No Balance Sheet	303	10	-	13	326	187,246	43,959	-	111	231,316
Assets Under \$250,000	1,153	2	-	-	1,155	60,227	48,806	-	-	109,032
Assets \$250,000 < \$1 Mil	981	2	-	1	984	63,673	764	-	5	64,442
Assets \$1 Mil < \$5 Mil	1,281	1	-	1	1,283	151,724	-	-	18	151,742
Assets \$5 Mil < \$10 Mil	482	2	-	-	484	92,083	95	-	-	92,178
Assets \$10 Mil < \$50 Mil	698	22	-	-	720	311,145	68,195	-	-	379,340
Assets \$50 Mil < \$100 Mil	244	18	-	-	262	206,995	40,904	-	-	247,899
Assets \$100 Mil < \$250 Mil	260	48	-	2	310	375,860	115,963	-	-	491,823
Assets \$250 Mil and over	269	761	-	2	1,032	817,786	10,884,707	-	-	11,702,493
Form 1120F	89	19	-	-	108	49,768	74,570	-	-	124,338
Fiduciary**	113	9	-	-	122	7,650	6,520	-	-	14,170
Estate, Total**	673	-	-	-	673	547,259	-	-	-	547,259
Gross Estate < \$1 Mil	171	-	-	-	171	40,327	-	-	-	40,327
Gross Estate \$1 Mil < \$5 Mil	389	-	-	-	389	228,912	-	-	-	228,912
Gross Estate \$5 Mil and over	113	-	-	-	113	278,020	-	-	-	278,020
Gift**	344	8	-	-	352	109,093	39,986	-	-	149,079
Employment	7,971	387	684	4	9,046	308,713	249,924	1,221	-	559,857
Excise	2,221	110	-	-	2,331	35,766	7,085	-	-	42,851
Windfall Profit	-	-	-	1	1	-	-	-	1	1
Miscellaneous Taxable [1]	35	27	-	-	62	47,405	7,230	-	-	54,635

[1] Miscellaneous taxable includes the following:

- a. Taxable 1120S Corporations
- b. 1120FSC (Foreign Sales Corporations)
- c. FIRPTA (U.S. Withholding Tax Return for Disposition by Foreign Persons of U.S. Property Interests, Form 8288)
- d. Annual Returns for Partnership Withholding Tax, Form 8804
- e. Other Miscellaneous taxable forms not specified.

NOTE: Lines marked with \*\* are included in the line titled: Income, Estate & Gift Total.

SOURCE: 1995 Internal Revenue Service, Annual Data Book, Publication 55B.