

IRS Data Book Table 18

Examination Coverage: Recommended Additional Tax, and Returns with Unagreed Additional Tax, After Examination, by Type and Size of Return, Fiscal Year 2020

[Money amounts are in thousands of dollars]

| Type and size of return | Examinations closed in Fiscal Year 2020 [1] | | | Recommended additional tax | | | Taxable return examination closures with unagreed recommended additional tax [1] | | | Amount unagreed | | |
|---------------------------------------------------------------|---------------------------------------------|----------------|----------------|----------------------------|-------------------|------------------|----------------------------------------------------------------------------------|--------------|----------------|------------------|------------------|----------------|
| | Total | Field [2] | Correspondence | Total | Field [2] | Correspondence | Total | Field [2] | Correspondence | Total | Field [2] | Correspondence |
| | (1) | (2) | (3) | (4) | (5) | (6) | (7) | (8) | (9) | (10) | (11) | (12) |
| United States, total | 509,917 | 139,742 | 370,175 | 12,925,688 | 10,090,821 | 2,834,867 | 12,076 | 8,337 | 3,739 | 4,335,021 | 4,305,746 | 29,275 |
| Taxable returns: | | | | | | | | | | | | |
| Individual income tax returns, total | 452,515 | 92,795 | 359,720 | 5,534,356 | 2,775,482 | 2,758,873 | 9,965 | 6,227 | 3,738 | 1,071,981 | 1,042,706 | 29,275 |
| Size of total positive income [3]: | | | | | | | | | | | | |
| No total positive income | 56,279 | 10,147 | 46,132 | 1,766,902 | 677,099 | 1,089,803 | 1,109 | 793 | 316 | 167,087 | 157,286 | 9,801 |
| \$1 under \$25,000 | 165,839 | 8,642 | 157,197 | 859,570 | 182,284 | 677,286 | 1,384 | 547 | 837 | 83,007 | 78,490 | 4,517 |
| \$25,000 under \$50,000 | 60,069 | 8,574 | 51,495 | 337,235 | 138,031 | 199,204 | 918 | 562 | 356 | 38,189 | 36,534 | 1,656 |
| \$50,000 under \$75,000 | 37,825 | 8,068 | 29,757 | 214,302 | 95,430 | 118,872 | 893 | 469 | 424 | 30,342 | 28,355 | 1,987 |
| \$75,000 under \$100,000 | 30,876 | 8,527 | 22,349 | 191,291 | 84,718 | 106,573 | 897 | 466 | 431 | 23,540 | 22,308 | 1,232 |
| \$100,000 under \$200,000 | 61,332 | 25,653 | 35,679 | 520,204 | 280,710 | 239,494 | 2,170 | 1,270 | 900 | 74,502 | 70,286 | 4,216 |
| \$200,000 under \$500,000 | 20,955 | 10,405 | 10,550 | 444,546 | 361,265 | 83,281 | 1,209 | 873 | 336 | 187,335 | 185,147 | 2,188 |
| \$500,000 under \$1,000,000 | 7,535 | 4,720 | 2,815 | 229,463 | 184,896 | 44,567 | 575 | 482 | 93 | 80,156 | 78,940 | 1,216 |
| \$1,000,000 under \$5,000,000 | 8,157 | 5,581 | 2,576 | 504,700 | 448,616 | 56,084 | 683 | 642 | 41 | 253,141 | 250,679 | 2,462 |
| \$5,000,000 under \$10,000,000 | 1,213 | 794 | 419 | 119,073 | 96,158 | 22,915 | d | d | d | d | d | d |
| \$10,000,000 or more | 1,520 | 862 | 658 | 344,961 | 224,315 | 120,647 | 54 | 54 | - | 92,128 | 92,128 | - |
| International returns [4] | 915 | 822 | 93 | 2,107 | 1,959 | 148 | d | d | d | d | d | d |
| Returns with earned income tax credit [5] | 157,803 | 295 | 157,508 | 684,604 | 2,019 | 682,585 | 749 | d | d | 4,411 | d | d |
| Corporation income tax returns, except Form 1120-S, total [6] | 9,695 | 9,468 | 227 | 6,082,864 | 6,071,970 | 10,894 | 803 | 803 | - | 2,782,899 | 2,782,899 | N/A |
| Returns other than Forms 1120-C and 1120-F [7]: | | | | | | | | | | | | |
| No balance sheet returns | 1,103 | 1,078 | 25 | 99,325 | 99,074 | 251 | 101 | 101 | - | 15,968 | 15,968 | N/A |
| Balance sheet returns by size of total assets: | | | | | | | | | | | | |
| Under \$250,000 | 1,366 | 1,335 | 31 | 85,549 | 84,985 | 564 | 116 | 116 | - | 35,022 | 35,022 | N/A |
| \$250,000 under \$1,000,000 | 1,403 | 1,384 | 19 | 65,133 | 64,454 | 679 | 118 | 118 | - | 15,115 | 15,115 | N/A |
| \$1,000,000 under \$5,000,000 | 1,066 | 1,036 | 30 | 54,533 | 54,228 | 305 | 109 | 109 | - | 24,874 | 24,874 | N/A |
| \$5,000,000 under \$10,000,000 | 280 | d | d | 29,051 | d | d | 48 | 48 | - | 19,315 | 19,315 | N/A |
| \$10,000,000 under \$50,000,000 | 1,228 | 1,216 | 12 | 79,405 | 79,397 | 7 | 76 | 76 | - | 36,568 | 36,568 | N/A |
| \$50,000,000 under \$100,000,000 | 571 | d | d | 49,699 | d | d | 28 | 28 | - | 30,429 | 30,429 | N/A |
| \$100,000,000 under \$250,000,000 | 564 | 552 | 12 | 164,100 | 164,079 | 21 | 33 | 33 | - | 105,672 | 105,672 | N/A |
| \$250,000,000 under \$500,000,000 | 334 | 321 | 13 | 41,442 | 40,702 | 740 | 13 | 13 | - | 9,882 | 9,882 | N/A |
| \$500,000,000 under \$1,000,000,000 | 340 | 332 | 8 | 81,714 | 80,455 | 1,259 | 23 | 23 | - | 20,347 | 20,347 | N/A |
| \$1,000,000,000 under \$5,000,000,000 | 602 | 591 | 11 | 422,452 | 420,715 | 1,737 | 48 | 48 | - | 182,476 | 182,476 | N/A |
| \$5,000,000,000 under \$20,000,000,000 | 336 | 325 | 11 | 784,315 | 779,604 | 4,711 | 34 | 34 | - | 496,156 | 496,156 | N/A |
| \$20,000,000,000 or more | 302 | 285 | 17 | 4,092,722 | 4,092,708 | 14 | 46 | 46 | - | 1,790,675 | 1,790,675 | N/A |
| Form 1120-C returns [7] | 28 | 28 | - | 228 | 228 | - | 5 | 5 | - | 166 | 166 | N/A |
| Form 1120-F returns [7] | 172 | 143 | 29 | 33,196 | 33,046 | 150 | 5 | 5 | - | 236 | 236 | N/A |
| Estate and trust income tax returns [8] | 801 | 234 | 567 | 80,246 | 69,451 | 10,794 | 13 | 13 | - | 8,927 | 8,927 | N/A |
| Estate tax returns, total [9] | 1,454 | 1,454 | - | 383,565 | 383,565 | - | 79 | 79 | - | 169,179 | 169,179 | N/A |
| Size of gross estate: | | | | | | | | | | | | |
| Under \$5,000,000 | 195 | 195 | - | 25,408 | 25,408 | - | 11 | 11 | - | 15,429 | 15,429 | N/A |
| \$5,000,000 under \$10,000,000 | 489 | 489 | - | 44,019 | 44,019 | - | 19 | 19 | - | 12,587 | 12,587 | N/A |
| \$10,000,000 or more | 770 | 770 | - | 314,137 | 314,137 | - | 49 | 49 | - | 141,162 | 141,162 | N/A |
| Gift tax returns | 1,259 | 1,259 | - | 272,104 | 272,104 | - | 98 | 98 | - | 258,034 | 258,034 | N/A |
| Employment tax returns | 27,212 | 20,682 | 6,530 | 491,032 | 437,701 | 53,331 | 1,040 | 1,040 | - | 39,326 | 39,326 | N/A |
| Excise tax returns | 4,753 | 4,286 | 467 | 77,348 | 76,901 | 446 | d | d | d | d | d | d |
| Other taxable returns [10] | 132 | 29 | 103 | 4,174 | 3,646 | 528 | d | d | d | d | d | d |
| Nontaxable returns [11]: | | | | | | | | | | | | |
| Partnership returns | 4,969 | 3,349 | 1,620 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| S corporation returns [12] | 6,538 | 6,156 | 382 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| Other nontaxable returns [13] | 589 | 30 | 559 | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| ► Employment tax returns | 1,627 | 1,627 | - | 242,932 | 242,932 | N/A | 1,627 | 1,627 | - | 242,932 | 242,932 | N/A |
| ► Excise tax returns | 514 | 514 | - | 133,646 | 133,646 | N/A | 514 | 514 | - | 133,646 | 133,646 | N/A |
| ► Other taxable returns [13] | 7 | d | d | 7,447 | d | d | 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 (TPI) 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-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).

[5] Includes all returns selected for examination on the basis of an earned income tax credit (EITC) claim. Shown separately for information purposes. Counts are included in the appropriate TPI classes.

[6] 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 10.

[7] 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).

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

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

[10] Includes Forms 1120-FSC (foreign sales corporation income tax return); 1120-S for S corporations reporting a tax (see footnote 12); 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).

[11] Nontaxable returns are filed for entities that generally do not have a tax liability but pass through any profits and losses to the underlying owners, who include these profits or losses on their income tax returns. The examination of partnership, S corporation, and other nontaxable returns affects the amount of recommended additional tax for these associated income tax returns.

[12] Includes most Forms 1120-S, which are filed by qualifying S corporations electing to be taxed through shareholders. Under certain conditions, S corporations are subject to tax and are included in "Other taxable returns" in this table. See footnote 10.

[13] Includes the following nontaxable returns: Form 1120-IC-DISC (domestic international sales corporation return); Form 1041 (income tax return for estates and trusts); and Form 1066 (real estate mortgage investment conduit income tax return). Under certain circumstances, estates and trusts (Form 1041) are not subject to tax and are reported as nontaxable. See Estate and trust income tax returns for taxable Forms 1041.

NOTES: Detail may not add to totals because of rounding. This table includes information on examinations closed in Fiscal Year 2020 of all individual income tax, corporation income tax, estate and trust income tax, estate tax, gift tax, employment tax, excise tax, and other taxable returns, as well as partnership, S corporation, and other nontaxable returns, and 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. The individual income tax portions of Tables 18-20 were reorganized for the FY 2020 IRS Data Book in order to be more consistent with the way data are presented in Table 17.

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 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) |
| United States, total | 20,040 | 14,517 | 5,523 | 6,658,557 | 6,608,912 | 49,645 |
| ▶ 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) |
| United States, total | 22,257 | 15,878 | 6,379 | 10,188,003 | 10,078,187 | 109,816 |
| ▶ 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) |
| United States, total | 24,087 | 17,824 | 6,263 | 11,461,968 | 11,367,494 | 94,474 |
| ▶ 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) |
| United States, total | 29,005 | 21,877 | 7,128 | 12,195,757 | 12,066,036 | 129,721 |
| ▶ 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) |
| United States, total | 27,820 | 20,505 | 7,315 | 7,442,486 | 7,265,002 | 177,484 |
| ▶ 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) |
| United States, total | 32,924 | 25,736 | 7,188 | 14,087,005 | 13,967,960 | 119,045 |
| ▶ 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 insurance

[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) |
| United States, total | 38,804 | 31,622 | 7,182 | 16,835,600 | 16,693,090 | 142,510 |
| ▶ 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 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-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 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) |
| United States, total | 47,075 | 38,915 | 8,160 | 18,654,923 | 18,355,134 | 299,789 |
| ▶ 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) |
| United States, total | 45,862 | 37,336 | 8,526 | 23,488,542 | 23,240,131 | 248,411 |
| ▶ 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) |
| United States, total | 42,729 | 34,051 | 8,678 | 23,367,804 | 23,148,375 | 219,429 |
| ▶ 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) |
| United States, total | 44,807 | 34,665 | 10,142 | 29,641,189 | 29,446,687 | 194,502 |
| ▶ 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) |
| United States, total | 45,351 | 33,191 | 12,160 | 23,445,478 | 23,137,115 | 308,363 |
| ▶ 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) |
| United States, total | 40,637 | 29,645 | 10,992 | 22,781,936 | 22,015,389 | 766,547 |
| 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 as nonbusiness returns if TGR is less than TPI. See footnotes 4 and 7.

[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);

1120-RFET (real estate investment trust); 1120-RIC (regulated investment company); and 1120-SF (settlement fund). Excludes certain other types of corporations, which are included in [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) |
| United States, total | 37,137 | 26,507 | 10,630 | 24,064,661 | 23,811,017 | 253,644 |
| 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) | |
| United States, total [4] | 36,346 | 1,199 | 15,262 | 8,332 | 168 | 11,385 | 26,561,476 | 20,883,295 | 4,733,406 | 104,606 | 2,137 | 838,028 |
| 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 | 202 | 10,224 |
| \$100,000 or more | 6,675 | 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:S: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) | |
| United States, total [4] | 30,640 | 1,057 | 11,604 | 6,499 | 198 | 218 | 11,064 | 12,427,498 | 9,007,795 | 3,132,685 | 109,226 | 1,915 | 13,734 | 162,142 |
| Income, estate, and gift tax, total [5] | 28,108 | 555 | 9,837 | 6,468 | 198 | [X] | 11,050 | 12,101,582 | 8,794,926 | 3,033,710 | 108,951 | 1,915 | -- | 162,079 |
| Individual income tax returns, total | 25,017 | 12 | 7,321 | 6,468 | 196 | [X] | 11,020 | 1,100,307 | 19,880 | 808,699 | 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 | -- | -- |
| Employment tax returns | 1,381 | 108 | 1,019 | 31 | [X] | 218 | 5 | 118,393 | 88,685 | 15,669 | 275 | -- | 13,734 | 30 |
| Excise tax returns [4] | 1,101 | 355 | 738 | [X] | [X] | [X] | 8 | 102,339 | 31,958 | 70,348 | -- | -- | -- | 33 |
| Other taxable returns [13] | 50 | 39 | 10 | [X] | [X] | [X] | [X] | 105,184 | 92,226 | 12,958 | -- | -- | -- | -- |

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); 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).

[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:S.E:EPD:MISA

Revised September 2007

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) | |
| United States, total [4] | 25,490 | 965 | 10,691 | 6,347 | 147 | 186 | 7,154 | 11,781,068 | 8,981,203 | 2,629,863 | 92,563 | 1,026 | 2,399 | 74,014 |
| Income, estate, and gift tax, total [5] | 23,368 | 574 | 9,171 | 6,323 | 147 | -- | 7,153 | 11,273,674 | 8,570,957 | 2,536,813 | 90,864 | 1,026 | -- | 74,014 |
| 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 | -- | -- | -- |
| Employment tax returns | 1,180 | 62 | 907 | 24 | -- | 186 | 1 | 429,084 | 360,276 | 64,710 | 1,699 | -- | 2,399 | [12] |
| Excise tax returns [4] | 899 | 295 | 604 | -- | -- | -- | -- | 13,545 | 3,289 | 10,256 | -- | -- | -- | -- |
| Other taxable returns [9,11] | 43 | 34 | 9 | -- | -- | -- | -- | 64,765 | 46,681 | 18,084 | -- | -- | -- | -- |

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: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) | |
| United States, total [4] | 25,459 | 1,283 | 12,041 | 6,547 | 126 | 177 | 5,285 | 13,301,853 | 10,067,476 | 3,122,755 | 80,626 | 1,859 | 1,611 | 27,526 |
| Income, estate, and gift tax, total [5] | 22,305 | 702 | 9,664 | 6,547 | 125 | -- | 5,267 | 12,907,670 | 9,764,894 | 3,032,823 | 80,626 | 1,856 | -- | 27,471 |
| 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 | 6,566 | 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 | -- | -- | -- | 178,761 | 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 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.

[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 55b. Also, Small Business/Self-Employed, Compliance Policy, Centralized Workload Selection and Delivery, Examination Management Information Systems and Automation S:C:CP: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) | |
| United States, total [6] | 25,371 | 1,013 | 12,505 | 7,085 | 4,768 | 12,294,484 | 9,646,122 | 2,540,101 | 80,619 | 27,642 |
| 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) | |
| United States, total [6] | 28,793 | 1,076 | 15,813 | 8,808 | 3,096 | 9,578,792 | 6,451,183 | 3,012,743 | 89,119 | 25,747 |
| 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: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) | |
| United States, total [6] | 43,452 | 1,159 | 22,101 | 12,686 | 7,506 | 11,761,372 | 8,638,841 | 2,981,163 | 112,717 | 28,650 |
| 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 ¹ | | | | | 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) | |
| United States, total | 61,740 | 1,393 | 33,078 | 21,771 | 5,498 | 14,479,810 | 9,532,105 | 4,697,276 | 191,845 | 58,584 |
| 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) |
| Grand Total | 42,572 | 1,852 | 30,106 | 7,744 | 82,274 | 5,642,478 | 10,764,280 | 292,664 | 58,457 | 16,757,878 |
| Income, Estate & Gift, Total** | 33,314 | 1,030 | 28,475 | 7,701 | 70,520 | 5,228,407 | 10,116,477 | 273,820 | 58,405 | 15,677,109 |
| Individual, Total** | 24,615 | 87 | 28,475 | 7,669 | 60,846 | 1,833,041 | 171,564 | 273,820 | 57,926 | 2,336,351 |
| 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 |
| Corporation, Total** | 7,274 | 911 | -- | 23 | 8,208 | 2,197,882 | 9,837,883 | -- | 211 | 12,035,976 |
| 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 |
| Fiduciary** | 254 | 22 | -- | 6 | 282 | 32,521 | 1,040 | -- | 64 | 33,625 |
| Estate, Total** | 791 | -- | -- | 3 | 794 | 951,334 | -- | -- | 203 | 951,538 |
| 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 |
| Gift** | 380 | 10 | -- | -- | 390 | 213,630 | 105,990 | -- | -- | 319,620 |
| Employment | 7,571 | 469 | 355 | 43 | 8,438 | 242,290 | 357,440 | 1,152 | 53 | 600,935 |
| Employment ROE *** | -- | -- | 1,276 | -- | 1,276 | -- | -- | 17,692 | -- | 17,692 |
| Excise | 1,656 | 324 | -- | -- | 1,980 | 167,824 | 280,209 | -- | -- | 448,034 |
| Miscellaneous Taxable | 31 | 29 | -- | -- | 60 | 3,956 | 10,153 | -- | -- | 14,109 |

[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

| | Amount Unagreed (in thousands of dollars) | | | | | | | | | |
|-------------------------------------------|----------------------------------------------|--------------|----------------|-------------------|---------------|------------------|-------------------|----------------|-------------------|-------------------|
| | Returns | | | | | 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] | |
| Grand Total | 41,089 | 1,504 | 29,750 | 8,963 | 81,306 | 4,708,824 | 12,591,779 | 266,249 | 62,673 | 17,629,525 |
| Income, Estate & Gift, Total** | 31,579 | 914 | 27,764 | 8,960 | 69,217 | 4,333,441 | 12,353,430 | 242,158 | 62,662 | 16,991,692 |
| Individual, Total** | 24,236 | 74 | 27,764 | 8,942 | 61,016 | 1,516,609 | 178,936 | 242,158 | 62,381 | 2,000,085 |
| 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 |
| Corporation, Total** | 6,092 | 835 | — | 15 | 6,942 | 2,043,738 | 12,057,745 | — | 123 | 14,101,606 |
| 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 |
| Fiduciary** | 177 | 4 | — | 3 | 184 | 6,679 | 907 | — | 158 | 7,743 |
| Estate, Total** | 730 | — | — | — | 730 | 583,834 | — | — | — | 583,834 |
| 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 |
| Gift** | 344 | 1 | — | — | 345 | 182,581 | 115,843 | — | — | 298,424 |
| Employment | 7,491 | 403 | 494 | 2 | 8,390 | 208,992 | 177,906 | 1,997 | — | 388,895 |
| Employment ROE *** [1] | — | — | 1,479 | — | 1,479 | — | — | 22,084 | — | 22,084 |
| Excise | 1,978 | 164 | 13 | — | 2,155 | 114,050 | 44,700 | 10 | — | 158,760 |
| Miscellaneous Taxable [2] | 41 | 23 | — | 1 | 65 | 52,342 | 15,742 | — | 11 | 68,095 |

*** 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:

- 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 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

| | Returns | | | | | Amount Unagreed (in thousands of dollars)..... | | | | |
|--------------------------------|---------------|-------|----------------|-------------------|--------|---------------------------------------------------|------------|----------------|-------------------|------------|
| | Non CEP | CEP | Tax Auditor | Service Center | Total | Non CEP | 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.