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The *Statistics of Income (SOI) Bulletin* is issued quarterly by the Statistics of Income Division of the Internal Revenue Service. This report provides written descriptive analyses of statistics previously released on SOI's Tax Stats webpage (see www.irs.gov/statistics) based on the data collected from the distinct types of tax and information returns filed with the IRS and included in SOI's programs. Periodically, this report also includes results from special analytical studies of particular interest to students of the U.S. tax system, tax policymakers, and tax administrators. Selected historical and other data tables previously published in the spring issue of the *SOI Bulletin* are now only available on SOI's Tax Stats webpages of the IRS website (https://www.irs.gov/statistics/soi-tax-stats-historical-data-tables). Information on the availability of supplemental data on the topics included in this issue or other SOI subjects may be obtained by sending an email to SOI's Statistical Information Services at sis@irs.gov, or by writing to the Director, Statistics of Income Division OS:RAAS:S, Internal Revenue Service, 1111 Constitution Avenue, NW, K-Room 4112, Washington, D.C. 20224.

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Inside This Issue

Foreign Recipients of U.S. Income, Calendar Year 2019 — 2

by Scott Luttrell

U.S.-source income payments to foreign persons, as reported on Foreign Person's U.S.-Source Income Subject to Withholding (Form 1042-S) rose to $1.1 trillion for Calendar Year (CY) 2019. This represents an increase of 6.2% from 2018. Withholding taxes on this income decreased by 1.4% as 89.8% of all U.S.-source income paid to foreign persons was exempt from withholding tax. Taxes on the residual U.S.-source income subject to tax were withheld at an average rate of 16.4%. (August 2023)

Individual Income Tax Returns, Preliminary Data, Tax Year 2021 — 16

by Michael Parisi

This article presents selected income and tax items from individual income tax returns using preliminary data for Tax Year (TY) 2021 and comparable data for TY 2020. The preliminary statistics are based on a stratified random sample of U.S. Individual Income Tax Returns (Forms 1040 and 1040-SR) and are intended to represent a full year of taxpayer reporting based on returns processed for tax administration purposes from January to late September of 2021. For TY 2021, taxpayers filed 160.4 million U.S. individual income tax returns, which were filed primarily in 2022, a decrease of 2.3% from the 164.2 million returns filed for TY 2020. Also for 2021, adjusted gross income (AGI) increased a very significant 18.6% to $14.9 trillion. Moreover, taxable income increased by 20.5% to $11.7 trillion for 2021. Similarly, total income tax increased by 29.4% to $2.2 trillion, and total tax liability increased by 29.2% to $2.3 trillion.

Individual Income Tax Returns, Preliminary Data, Tax Year 2021

by Michael Parisi

This article presents selected income and tax items from individual income tax returns using preliminary data for Tax Year (TY) 2021 and comparable data for TY 2020. The preliminary statistics in this data release are based on a stratified random sample of U.S. Individual Income Tax Returns (Forms 1040 and 1040-SR). These preliminary estimates are intended to represent a full year of taxpayer reporting based on returns processed for tax administration purposes from January to late September of 2021. To release more complete and accurate statistics that are closer to final ones, a new methodology was introduced modifying the preliminary data by applying a rolling 3-year average for the table in this release. For each AGI class cell, the rates of change from preliminary to final data for each of the prior 3 years were calculated and then averaged. This average was then applied to the current year preliminary data to calculate the estimated preliminary data. The totals were then created from the various cell parts. For TY 2021, taxpayers filed 160.4 million U.S. individual income tax returns, which were filed primarily in 2022 (see Data Sources and Limitations), a decrease of 2.3% from the 164.2 million returns filed for TY 2020 (Table 1). For 2021, adjusted gross income (AGI) increased a very significant 18.6% to $14.9 trillion. This increase in AGI was reflected by increases in some components of income, highlighted by net capital gains increasing 67.2%. Other components that grew included taxable income from IRA distributions (44.6%), business or profession net income less loss (34.2%), ordinary dividends (19.6%), salaries and wages (8.5%), and taxable income from pensions and annuities (6.4%). Taxable income also increased by 20.5% to $11.7 trillion for 2021. Similarly, total income tax increased by 29.4% to $2.2 trillion, and total tax liability increased by 29.2% to $2.3 trillion.

Adjusted Gross Income

Some components contributed to the growth in total AGI in 2021 (Table 1). The largest component of AGI, salaries and wages, increased 8.5% to $9,106.1 billion. The second largest component, net capital gains, showed a major increase of 67.2% to $2,004.5 billion. The third largest component, partnership and S corporation net income less loss rose to $958.3 billion (36.9%). Taxable pensions and annuities increased 6.4% to $868.1 billion. Other items related to retirement, taxable income from individual retirement arrangements and taxable Social Security benefits, rose 44.6% (to $413.9 billion) and 12.6% (to $413.5 billion), respectively. Also, sole proprietorship net income increased 34.2% to $408.8 billion and ordinary dividends rose by 19.6% to $392.8 billion.

Alternatively, taxable interest decreased, by 7.8% to $115.2 billion. Also, unemployment compensation decreased 50.2% to $205.90 billion, as the number of tax returns reporting taxable unemployment compensation decreased 48.8% to 15.6 million returns.

Adjustments

Statutory adjustments to total income increased 7.2% to $144.2 billion for TY 2021. The largest statutory adjustment was the deduction for the self-employment tax, which increased 19.0% from $32.9 billion to $39.1 billion. The self-employment health insurance deduction rose to $30.9 billion, a 4.9% increase. Contributions to self-employed retirement (Keogh) plans increased 13.1% to $29.1 billion. Other adjustments that increased from 2020 levels were moving expenses (66.2%), payments to an Individual Retirement Arrangement (2.7%), and health savings account deduction (1.7%).

Deductions

In 2021, most tax returns (88.4%) claimed a standard deduction, and the total standard deduction increased 0.4% to $2,504.4 billion. In 2020, standard deductions were taken on 87.5% of returns and totaled $2,495.2 billion. The average standard deduction claimed increased from $17,375 for 2020 to $17,671 for 2021. Itemized deductions were claimed on only 9.3% of all returns for 2021.[1] The total amount of itemized deductions claimed increased 11.5% to $664.5 billion, while the average amount claimed increased 14.0% to $44,374.

Charitable contributions deduction, the largest itemized deduction, was up 32.3% to $266.9 billion. A taxpayer who didn't itemize deductions on Form 1040, Schedule A, may have qualified to take a deduction for charitable contributions on Form 1040. The maximum amount for the contributions was $300 for single, head of household, qualifying widow(er), or married filing separately ($600 for married filing jointly). This deduction, a nonitemized, charitable contribution, was taken on 47.7 million (33.6%) of individual returns that opted to take the standard deduction for a total of $17.8 billion. Interest paid, the second largest itemized deduction, decreased 6.7% from the previous year to $166.8 billion. Mortgage interest accounted for 83.9% ($139.9 billion) of the total interest paid deduction. For 2021, total taxes paid deduction decreased 3.3% to $117.3

[1] The remaining 2.3 percent of the returns did not need to claim either a standard deduction or itemized deductions because no AGI was reported, or the return was filed as married filing separately and the spouse itemized.

billion. Other itemized deductions included the medical and dental expenses deduction, up 0.9% to $77.1 billion.

The qualified business income deduction, which could have been taken in addition to the standard deduction or itemized deductions, was taken on 25.9 million returns (for an average of $7,966 per return), totaling $206.7 billion for 2021, a 28.6% increase from 2020. Two-thirds of these business deductions were taken by individuals with an AGI of $250 thousand or more.

Taxable Income and Total Income Tax

Taxable income increased 20.5% to $11.7 trillion for 2021, and total income tax increased 29.4% to $2.2 trillion. The alternative minimum tax (AMT) increased 102.2% to $6.1 billion. The number of returns with AMT liability showed a major increase to 257.8 thousand, increasing 81.6% from 2020.

Average AGI reported on all 2021 individual income tax returns was $92,605, an increase from the 2020 amount of $76,279 (21.4%). Average taxable income (for those returns with taxable income) was $90,679 in 2021, a 19.5% increase from the 2020 amount of $75,900. Average income tax for taxable returns rose 27.0% for 2021 to $20,741.

Tax Credits

Tax credits offset tax liabilities, and when the amount of the credit is greater than the tax liability, the excess, depending on the credit, is often refundable. Examples of credits where the excess is refundable include the earned income credit (EIC) and the additional child tax credit (including advance child tax payments minus excess payments). For 2021, the total amount of EIC claimed ($65.5 billion) increased 9.2% from 2020. The American Rescue Plan Act of 2021 enhanced the child tax credit for 2021; the child tax credit was extended to qualifying children under age 18. Depending on modified adjusted gross income, a taxpayer received an enhanced credit amount of up to $3,600 for a qualifying child under age 6 and up to $3,000 for a qualifying child over age 5 and under age 18. (See Changes in Law and Inflationary Adjustments below.) The additional child tax credit including reconciliation for excess advance child tax payments was taken on 40.1 million returns for a total of $122.1 billion in 2021. Similar to 2020, a refundable recovery rebate credit for 2021 was available if a taxpayer didn't receive the full amount of the recovery rebate credit as a third round Economic Impact Payments (EIPs). They were able to claim the recovery rebate credit on their 2021 Form 1040 or Form 1040-SR. The total recovery rebate was taken on 11.6 million returns for 2021 and totaled $19.9 billion. Also, for one year, the childcare credit was increased, and most were made refundable (see Changes in Law and Inflationary Adjustments below). This led to $12.6 billion taken in refundable childcare credits. Due to the law changes in the child tax credit and childcare credit, total refundable credits showed a significant increase—to $255.1 billion, up 74.9% from 2020 levels. Total tax credits used against income tax totaled $150.7 billion, a 1.8% increase from 2020.

Changes in Law and Inflationary Adjustments

In general, the definitions used in this article are the same as those in Publication 1304, Individual Income Tax Returns Complete Report, 2020. The following is a partial list of tax law changes and inflationary adjustments that had an impact on the data presented in this article.

Alternative minimum tax—The maximum AMT exemption increased from $113,400 to $114,600 for a married couple filing a joint return, from $72,900 to $73,600 for single filers and heads of household, and from $56,700 to $57,300 for a married person filing separately. The income levels at which the AMT exemption began to phase out increased to $523,600 from $518,400 ($1,047,200 from $1,036,800 if married filing jointly or a qualifying widow(er)). Also, for 2021, the 26% tax rate applied to the first $199,900 ($99,950 if married filing separately) of alternative minimum taxable income. Previously it applied to the first $197,900 ($98,950) of such income.

Childcare credit—The American Rescue Plan Act of 2021, enacted on March 11, 2021, expanded the child and dependent care tax credit for 2021 by making it refundable and larger for certain taxpayers. For 2021, the dollar limit on qualifying expenses increased to $8,000 (previously $3,000) for one qualifying person and $16,000 (previously $6,000) for two or more qualifying persons. The rules for calculating the credit also changed; the percentage of qualifying expenses eligible for the credit was increased from 35% to 50%, along with the income limit at which the credit begins phasing out, $125,000 (previously $15,000). Additionally, for taxpayers who received dependent care benefits from their employer, the dollar limit of the exclusion amount increased for 2021 to $10,500 (previously $5,000). For married employees filing separate returns, the maximum amount increased to $5,250 (previously $2,500).

Child tax credit—Under the American Rescue Plan Act of 2021, the child tax credit has been enhanced for 2021. The child tax credit was extended to qualifying children under age 18. Depending on modified adjusted gross income, a taxpayer received an enhanced credit amount of up to $3,600 for a qualifying child under age 6 and up to $3,000 for a qualifying child over age 5 and under age 18. The enhanced credit amount began to phase out where modified adjusted gross income exceeded $150,000 in the case of a joint return or surviving spouse, $112,500 in the case of a head of household, and $75,000 in all other cases. If a taxpayer (or a taxpayer's spouse if filing jointly) lived in the United States for more than half the year, the child tax credit was fully refundable even if the taxpayer had no earned income. If the taxpayer did not meet this residency requirement, the child tax credit was a combination of a nonrefundable child tax credit and a refundable additional child tax credit, as was the case in 2020. The credit for other dependents was not enhanced and was figured as it was in 2020.

Earned income credit—The maximum amount of the earned income credit increased, as did the amounts of earned income and investment income an individual could receive and still claim

the credit. The maximum credit for taxpayers with no qualifying children rose from $538 to $1,502. For these taxpayers, earned income and AGI had to be less than $21,430 ($27,380 if married filing jointly) to be eligible for the EIC. Special rules applied if claiming the EIC without a qualifying child. The minimum age was lowered to age 19 except for specified students who must have been age 24 at the end of the year. The applicable minimum age was lowered further to age 18 for former foster youth and qualified homeless youth. Additionally, taxpayers no longer had to be under age 65 to claim the EIC without a qualifying child. For taxpayers with one qualifying child, the maximum credit increased from $3,584 to $3,618, and, for taxpayers with two qualifying children, the maximum credit increased from $5,920 to $5,980. To be eligible for the credit, a taxpayer's earned income and AGI had to be less than $42,158 ($48,108 for married filing jointly) for one qualifying child, or less than $47,915 ($53,865 for married filing jointly) for two qualifying children. The maximum credit for taxpayers with three or more qualifying children increased from $6,660 to $6,728. For these taxpayers, earned income and AGI had to be less than $51,464 ($57,414 if married filing jointly) to be eligible for the EIC. The maximum amount of investment income (interest, dividends, and capital gain income) a taxpayer could have and still claim the credit was $10,000 for the year. If a taxpayer was married but didn't file a joint return, they may still have qualified to claim the EIC if they lived with a qualifying child for more than half the year and lived apart from their spouse for last 6 months of 2021 or were legally separated under written agreement and did not live in same household as their spouse. If two taxpayers could claim the same qualifying child, the taxpayer who did not claim the child was able to claim the EIC without a qualifying child.

Economic impact payment and recovery rebate credit—The American Rescue Plan Act of 2021 provided an eligible individual for their first taxable year beginning in 2021 a refundable tax credit referred to as the recovery rebate credit. The IRS refers to the advance refund of this credit as the third EIP. The third round of EIP was up to $1,400 ($2,800 for eligible individuals filing a joint tax return), plus $1,400 per qualifying child of the eligible individual. Any EIP received by the taxpayer was not taxable for federal income tax purposes but did reduce the amount of a taxpayer's recovery rebate credit. The third round EIP was based on a taxpayer's 2020 tax year information. The credit was reduced proportionally as a taxpayer's AGI exceeded a threshold and rose to a full phaseout amount. The threshold was $150,000 and phased out at $160,000 in the case of a joint return or qualifying widow, $112,500 and $120,000 in the case of a head of household, and $75,000 and $80,000 otherwise. Those ineligible for the credit were (1) nonresident alien individuals, (2) individuals who can be claimed as a dependent by another taxpayer, and (3) an estate or trust. When spouses filed jointly, both spouses must have had a valid Social Security number (SSN) to receive the credit, unless either spouse was a member of the U.S. Armed Forces at any time during the taxable year. In that case, only one spouse needed to have a valid SSN. An individual without a valid SSN could have received up to $1,400 for a qualified dependent claimed on the individual's return if the individual met all other eligibility and income requirements. The recovery rebate credit was figured as the third round EIP except the credit eligibility and credit amount were based on 2021 tax year information. If a taxpayer didn't receive the full amount of the recovery rebate credit as an EIP, they were able to claim the recovery rebate credit on their 2021 Form 1040 or Form 1040-SR.

Premium tax credit—The American Rescue Plan Act of 2021, passed on March 11, 2021, expanded the PTC by eliminating the limitation that a taxpayer's household income may not exceed 400% of the Federal Poverty Line and generally increased the credit amounts. In addition, in 2021, if a taxpayer received unemployment compensation, they were generally eligible to claim the PTC if they met the other requirements.

Qualified sick and family leave credit—The American Rescue Plan Act of 2021, enacted on March 11, 2021, provided certain self-employed individuals the opportunity to claim credits for up to 10 days of "paid sick leave" and up to 60 days of "paid family leave" if they were unable to work or telework due to circumstances related to coronavirus. Self-employed individuals claimed these credits for the period beginning on April 1, 2021, and ending September 30, 2021.

Standard deduction amount—The standard deduction for people who did not itemize deductions on Schedule A of Form 1040 was increased in 2021 for all filers. This amount depended on the taxpayer's filing status, whether the taxpayer was age 65 or older or whether the taxpayer was a dependent of another person. For 2021, the standard deduction increased to $25,100 for joint filers, up from $24,800 for 2020. For single filers and married filers filing separately, the deduction amount increased to $12,550, up from $12,400. For heads of households, the deduction was $18,800, up from $18,650.

Tuition and fees deduction—The tuition and fees deduction was not available after 2020. Instead, the income limitations for the lifetime learning credit were increased.

Data Sources and Limitations

The preliminary statistics in this data release are based on a sample of U.S. Individual Income Tax Returns (Forms 1040 and Form 1040-SR) filed during Calendar Year 2022. Returns in the sample were stratified based on: (1) the larger of positive income or negative income; (2) the size of business and farm receipts; and (3) the presence or absence of specific forms or schedules.[2] Returns were then selected at rates ranging from 0.1% to 100%. The preliminary TY 2021 data are based on a sample of 290,810 returns and an estimated final population of 161,929,797 returns.

[2] Returns in the sample were stratified based on the presence or absence of one or more of the following forms or schedules: Form 2555, Foreign Earned Income; Form 1116, Foreign Tax Credit (Individual, Fiduciary, or Nonresident Alien Individual); Schedule C, Profit or Loss from Business (Sole Proprietorship); and Schedule F, Profit or Loss from Farming.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To use the statistical data provided properly, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude. The reliability of estimates based on samples, and the use of CVs for evaluating the precision of estimates based on samples, are discussed in "SOI Sampling Methodology and Data Limitations," located at http://www.irs.gov/pub/irs-soi/sampling.pdf.

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Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns			Tax year 2021, by size of adjusted gross income	
	Tax year 2020	Tax year 2021	Percent difference	Under $15,000 [1]	$15,000 under $30,000
	(1)	(2)	(3)	(4)	(5)
Number of returns, total	**164,187,262**	**160,392,132**	**-2.3**	**30,714,103**	**27,409,921**
Adjusted gross income (less deficit)	**12,524,081,586**	**14,853,047,024**	**18.6**	**160,421,216**	**610,846,011**
Salaries and wages:					
Number of returns	130,600,582	126,467,797	-3.2	18,680,807	20,934,474
Amount	8,390,686,567	9,106,087,369	8.5	177,463,295	433,999,744
Taxable interest:					
Number of returns	48,007,435	48,874,094	1.8	4,703,566	4,325,723
Amount	125,048,893	115,247,059	-7.8	6,599,494	1,826,759
Tax-exempt interest [2]:					
Number of returns	6,434,215	6,583,895	2.3	303,927	243,123
Amount	78,653,929	53,933,545	-31.4	1,338,930	396,024
Ordinary dividends:					
Number of returns	30,906,564	32,244,779	4.3	2,608,440	2,125,303
Amount	328,354,410	392,762,437	19.6	7,219,108	4,504,559
Qualified dividends:					
Number of returns	28,873,920	30,529,639	5.7	2,370,885	1,951,972
Amount	258,943,208	297,478,694	14.9	4,814,092	2,905,513
State income tax refunds:					
Number of returns	3,695,635	3,132,334	-15.2	92,874	114,167
Amount	4,191,565	3,631,709	-13.4	101,154	114,359
Alimony received:					
Number of returns	316,887	262,779	-17.1	33,981	34,939
Amount	9,988,557	8,325,710	-16.6	265,498	403,323
Business or profession net income less loss (Schedule C):					
Number of returns	27,455,060	28,829,379	5.0	6,423,694	5,249,187
Amount	304,598,033	408,828,259	34.2	-207,201	35,502,277
Net capital gain [3]:					
Number of returns	19,337,347	25,040,263	29.5	1,647,075	1,597,658
Amount	1,198,537,628	2,004,507,022	67.2	23,923,639	7,238,779
Capital gain distributions [3]:					
Number of returns	14,772,459	16,929,413	14.6	1,165,336	962,042
Amount	64,777,609	154,932,968	139.2	2,628,145	2,134,431
Net capital loss:					
Number of returns	9,192,630	8,097,885	-11.9	1,103,251	772,335
Amount	19,343,761	16,277,490	-15.9	2,329,757	1,401,953
Sales of property other than capital assets, net gain:					
Number of returns	989,881	1,108,272	12.0	89,596	45,167
Amount	46,580,921	96,052,202	106.2	2,775,001	605,888
Sales of property other than capital assets, net loss:					
Number of returns	916,713	877,553	-4.3	121,934	46,201
Amount	17,853,190	23,156,775	29.7	11,271,345	585,071
Taxable income from individual retirement arrangement (IRA) distributions:					
Number of returns	13,019,775	15,630,325	20.1	1,476,719	1,511,595
Amount	286,146,123	413,846,113	44.6	9,731,800	14,359,734
Taxable pensions and annuities:					
Number of returns	30,237,093	29,443,396	-2.6	3,073,865	3,603,134
Amount	816,108,529	868,087,988	6.4	22,400,633	46,057,154
Rent and royalty net income less loss:					
Number of returns	9,477,092	9,558,299	0.9	982,982	742,137
Amount	43,289,967	60,499,037	39.8	-3,488,725	1,775,097

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Tax year 2021, by size of adjusted gross income				
	$30,000 under $50,000	$50,000 under $100,000	$100,000 under $200,000	$200,000 under $250,000	$250,000 or more
	(6)	(7)	(8)	(9)	(10)
Number of returns, total	**28,925,796**	**37,546,954**	**24,179,726**	**3,727,975**	**7,887,657**
Adjusted gross income (less deficit)	**1,135,402,586**	**2,681,108,114**	**3,318,595,267**	**828,813,839**	**6,117,859,991**
Salaries and wages:					
Number of returns	24,771,283	31,661,452	20,501,320	3,211,292	6,707,169
Amount	903,042,404	2,014,327,725	2,374,636,669	573,445,004	2,629,172,528
Taxable interest:					
Number of returns	5,719,223	12,544,142	12,828,623	2,498,669	6,254,148
Amount	2,829,099	8,482,847	12,739,271	3,587,656	79,181,933
Tax-exempt interest [2]:					
Number of returns	412,995	1,275,905	1,897,907	496,579	1,953,459
Amount	818,953	2,829,169	8,494,364	2,383,638	37,672,467
Ordinary dividends:					
Number of returns	3,036,622	7,701,826	9,015,624	2,080,245	5,676,719
Amount	6,736,730	25,921,661	51,246,401	19,418,542	277,715,436
Qualified dividends:					
Number of returns	2,807,645	7,248,209	8,607,564	2,010,203	5,533,161
Amount	4,495,222	17,718,972	36,367,603	13,962,023	217,215,269
State income tax refunds:					
Number of returns	300,557	1,261,708	1,070,110	119,486	173,432
Amount	246,923	1,173,653	1,175,926	230,003	589,691
Alimony received:					
Number of returns	43,863	91,927	41,814	7,755	8,500
Amount	605,868	2,299,138	2,095,337	951,649	1,704,897
Business or profession net income less loss (Schedule C):					
Number of returns	4,259,620	5,752,951	4,521,777	781,769	1,840,381
Amount	37,329,792	71,028,961	85,479,534	23,394,131	156,300,765
Net capital gain [3]:					
Number of returns	2,364,413	5,940,790	7,047,856	1,628,391	4,814,080
Amount	13,786,390	53,045,388	136,288,758	56,691,453	1,713,532,615
Capital gain distributions [3]:					
Number of returns	1,381,928	3,873,523	4,821,327	1,168,903	3,556,354
Amount	3,899,190	16,797,612	33,291,656	12,457,839	83,724,095
Net capital loss:					
Number of returns	870,459	1,861,407	1,941,708	443,193	1,105,532
Amount	1,565,684	3,543,959	3,907,412	935,643	2,593,082
Sales of property other than capital assets, net gain:					
Number of returns	75,550	186,527	258,546	64,993	387,893
Amount	978,715	2,697,469	5,120,083	1,904,976	81,970,070
Sales of property other than capital assets, net loss:					
Number of returns	61,127	151,130	169,145	49,835	278,181
Amount	675,008	1,452,829	1,487,953	506,149	7,178,420
Taxable income from individual retirement arrangement (IRA) distributions:					
Number of returns	1,790,325	4,290,291	4,217,528	744,924	1,598,942
Amount	20,676,981	72,390,562	131,957,789	35,708,951	129,020,296
Taxable pensions and annuities:					
Number of returns	4,248,282	8,649,169	6,980,907	1,063,392	1,824,646
Amount	77,191,876	243,796,599	299,174,227	58,140,701	121,326,798
Rent and royalty net income less loss:					
Number of returns	897,448	2,418,197	2,495,242	472,041	1,550,252
Amount	431,357	3,057,608	12,103,031	4,742,880	41,877,789

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns			Taxyear 2021, by size of adjusted gross income	
	Tax year 2020	Tax year 2021	Percent difference	Under $15,000 [1]	$15,000 under $30,000
	(1)	(2)	(3)	(4)	(5)
Partnership and S corporation net income less loss:					
Number of returns	8,884,681	9,206,813	3.6	667,932	483,149
Amount	699,782,827	958,311,890	36.9	-74,957,481	412,641
Estate and trust net income less loss:					
Number of returns	643,877	664,373	3.2	38,790	38,101
Amount	30,390,540	51,476,361	69.4	-539,480	328,306
Farm net income (Schedule F):					
Number of returns	463,321	452,295	-2.4	65,886	43,555
Amount	12,203,109	13,618,034	11.6	737,629	644,377
Farm net loss (Schedule F):					
Number of returns	1,254,828	1,259,894	0.4	209,642	109,064
Amount	35,179,960	38,823,924	10.4	8,290,505	2,507,849
Unemployment compensation [4]:					
Number of returns	30,450,880	15,590,254	-48.8	1,827,783	4,869,001
Amount	413,462,280	205,860,733	-50.2	16,737,378	67,105,252
Taxable Social Security benefits:					
Number of returns	22,764,997	23,805,882	4.6	367,451	3,489,782
Amount	367,328,550	413,476,369	12.6	708,516	9,814,438
Nonitemized charitable contributions:					
Number of returns	42,178,737	47,657,428	13.0	4,300,804	5,854,965
Amount	10,889,467	17,833,403	63.8	1,162,376	1,708,805
Total statutory adjustments:					
Number of returns	36,667,242	32,884,241	-10.3	5,442,100	4,803,404
Amount	134,552,587	144,239,288	7.2	9,126,988	6,593,362
Educator expenses:					
Number of returns	3,438,199	3,148,801	-8.4	63,243	179,999
Amount	904,103	835,973	-7.5	15,333	42,570
Certain business expenses of reservists, performing artists, and fee-basis government officials:					
Number of returns	311,049	277,228	-10.9	17,212	39,491
Amount	2,329,303	2,139,749	-8.1	256,834	381,531
Payments to an individual retirement arrangement:					
Number of returns	2,448,381	2,431,206	-0.7	77,818	210,022
Amount	13,431,087	13,791,451	2.7	319,113	800,212
Student loan interest deduction:					
Number of returns	10,204,642	4,936,946	-51.6	275,534	502,334
Amount	7,784,507	4,293,753	-44.8	277,678	465,913
Health savings account deduction:					
Number of returns	2,013,473	1,948,063	-3.2	40,968	84,186
Amount	5,890,930	5,989,891	1.7	129,831	167,655
Moving expenses adjustment:					
Number of returns	82,804	97,857	18.2	* 3,299	18,101
Amount	173,324	288,101	66.2	* 31,799	39,033
Self-employment tax deduction:					
Number of returns	20,071,238	21,828,479	8.8	4,988,068	3,919,765
Amount	32,886,721	39,132,833	19.0	2,823,175	3,743,214
Self-employed health insurance deduction:					
Number of returns	3,586,172	3,692,457	3.0	306,361	296,391
Amount	29,485,701	30,936,542	4.9	1,226,231	1,041,717
Payments to a self-employed retirement (Keogh) plan:					
Number of returns	937,228	1,007,146	7.5	14,675	13,622
Amount	25,763,784	29,128,291	13.1	157,072	141,733

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Tax year 2021, by size of adjusted gross income				
	$30,000 under $50,000	$50,000 under $100,000	$100,000 under $200,000	$200,000 under $250,000	$250,000 or more
	(6)	(7)	(8)	(9)	(10)
Partnership and S corporation net income less loss:					
Number of returns	681,854	1,655,297	2,388,898	635,231	2,694,452
Amount	4,335,238	21,758,747	62,410,130	32,051,477	912,301,138
Estate and trust net income less loss:					
Number of returns	37,765	116,645	184,058	51,482	197,532
Amount	351,191	1,393,903	4,353,022	1,402,761	44,186,658
Farm net income (Schedule F):					
Number of returns	53,909	112,676	107,063	18,731	50,475
Amount	965,364	2,375,110	3,648,319	911,236	4,335,999
Farm net loss (Schedule F):					
Number of returns	147,172	332,353	296,366	50,939	114,358
Amount	3,157,143	7,088,135	7,599,153	1,696,852	8,484,287
Unemployment compensation [4]:					
Number of returns	3,278,235	3,303,592	1,823,023	192,644	295,973
Amount	47,723,722	44,869,379	23,038,010	2,552,313	3,834,679
Taxable Social Security benefits:					
Number of returns	4,144,470	7,772,504	5,659,053	786,541	1,586,081
Amount	35,671,604	144,453,844	149,496,743	23,280,225	50,050,999
Nonitemized charitable contributions:					
Number of returns	7,851,551	13,684,101	11,187,555	1,754,265	3,024,187
Amount	2,459,367	5,093,158	5,083,149	842,824	1,483,724
Total statutory adjustments:					
Number of returns	4,730,229	7,714,471	6,465,137	1,020,565	2,708,335
Amount	10,191,731	21,729,845	29,372,466	8,149,596	59,075,300
Educator expenses:					
Number of returns	407,974	1,023,066	1,098,707	180,874	194,938
Amount	100,875	262,568	315,965	49,088	49,574
Certain business expenses of reservists, performing artists, and fee-basis government officials:					
Number of returns	56,330	85,961	60,796	8,952	8,486
Amount	384,973	633,259	381,873	55,630	45,649
Payments to an individual retirement arrangement:					
Number of returns	424,520	770,528	721,081	67,503	159,734
Amount	1,733,178	4,191,240	4,561,167	554,905	1,631,636
Student loan interest deduction:					
Number of returns	1,021,890	1,856,462	1,280,726	0	0
Amount	968,617	1,544,731	1,036,814	0	0
Health savings account deduction:					
Number of returns	228,421	513,688	535,325	131,101	414,374
Amount	406,966	1,115,607	1,627,754	470,836	2,071,242
Moving expenses adjustment:					
Number of returns	17,504	37,780	19,128	* 714	* 1,331
Amount	36,307	115,682	56,963	* 1,369	* 6,948
Self-employment tax deduction:					
Number of returns	2,919,245	4,128,147	3,382,409	624,615	1,866,230
Amount	3,947,599	7,093,560	7,787,473	1,963,488	11,774,324
Self-employed health insurance deduction:					
Number of returns	374,919	727,693	848,157	211,103	927,833
Amount	1,712,213	3,902,943	7,327,452	2,149,264	13,576,722
Payments to a self-employed retirement (Keogh) plan:					
Number of returns	25,782	106,660	236,827	87,045	522,535
Amount	265,429	1,178,952	4,142,125	1,919,023	21,323,957

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns			Tax year 2021, by size of adjusted gross income	
	Tax year 2020	Tax year 2021	Percent difference	Under $15,000 [1]	$15,000 under $30,000
	(1)	(2)	(3)	(4)	(5)
Penalty on early withdrawal of savings:					
Number of returns	382,364	309,687	-19.0	40,742	42,161
Amount	337,269	112,709	-66.6	5,714	13,463
Alimony paid:					
Number of returns	404,967	383,523	-5.3	35,927	10,171
Amount	10,023,352	9,667,931	-3.5	496,865	81,577
Total standard deduction:					
Number of returns	143,605,871	141,718,820	-1.3	26,880,895	26,869,818
Amount	2,495,179,737	2,504,377,020	0.4	360,164,684	422,883,588
Total itemized deductions (after limitation):					
Number of returns	15,317,687	14,974,757	-2.2	291,771	529,903
Amount	596,026,916	664,485,533	11.5	7,144,628	14,040,050
Medical and dental expenses deduction:					
Number of returns	3,886,536	3,728,203	-4.1	209,799	373,847
Amount	76,406,887	77,070,521	0.9	4,074,610	6,858,343
Taxes paid deduction [5]:					
Number of returns	15,198,581	14,807,328	-2.6	270,790	497,355
Amount	121,217,785	117,265,372	-3.3	1,180,939	2,287,346
Income taxes [6]:					
Number of returns	11,054,722	10,812,894	-2.2	77,945	202,925
Amount	205,865,955	242,699,175	17.9	222,794	410,487
General sales taxes [6]:					
Number of returns	3,743,071	3,620,771	-3.3	160,335	265,577
Amount	9,164,513	8,323,017	-9.2	83,805	271,781
Interest paid deduction:					
Number of returns	12,398,715	11,832,322	-4.6	133,310	275,240
Amount	178,795,299	166,789,095	-6.7	1,439,599	3,064,919
Total mortgage interest paid deduction:					
Number of returns	12,157,952	11,584,193	-4.7	128,752	269,755
Amount	157,053,165	139,859,822	-10.9	1,334,789	2,858,343
Charitable contributions deduction:					
Number of returns	12,448,778	12,181,367	-2.1	153,537	357,560
Amount	201,639,287	266,867,230	32.3	293,862	1,379,561
Qualified business income deduction:					
Number of returns	22,658,245	25,942,032	14.5	469,945	2,971,275
Amount	160,696,029	206,666,715	28.6	102,641	2,722,743
Taxable income:					
Number of returns	127,723,634	128,850,091	0.9	3,702,698	23,134,902
Amount	9,694,281,789	11,683,973,133	20.5	5,378,125	189,335,926
Alternative minimum tax:					
Number of returns	141,956	257,809	81.6	4,474	* 277
Amount	3,013,088	6,093,140	102.2	217,996	* 2,741
Excess advance premium tax credit repayment [7]:					
Number of returns	1,865,432	2,626,268	40.8	157,847	387,627
Amount	1,819,405	3,833,172	110.7	58,973	134,403
Income tax before credits:					
Number of returns	127,081,774	128,227,111	0.9	3,621,926	22,891,865
Amount	1,797,921,435	2,272,983,812	26.4	886,198	19,362,816
Total tax credits [8]:					
Number of returns	69,261,903	67,298,383	-2.8	2,286,834	14,435,161
Amount	147,975,810	150,673,355	1.8	297,294	7,177,755

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Tax year 2021, by size of adjusted gross income				
	$30,000 under $50,000	$50,000 under $100,000	$100,000 under $200,000	$200,000 under $250,000	$250,000 or more
	(6)	(7)	(8)	(9)	(10)
Penalty on early withdrawal of savings:					
Number of returns	33,605	68,410	72,979	18,275	33,515
Amount	10,695	44,140	17,343	4,807	16,547
Alimony paid:					
Number of returns	38,358	94,205	100,779	25,158	78,925
Amount	397,675	1,192,349	1,854,929	689,203	4,955,333
Total standard deduction:					
Number of returns	27,823,778	33,616,488	19,582,157	2,634,639	4,311,045
Amount	460,043,363	642,036,347	452,673,085	63,219,349	103,356,604
Total itemized deductions (after limitation):					
Number of returns	1,084,238	3,894,738	4,555,579	1,084,770	3,533,758
Amount	28,735,436	103,587,810	140,898,846	39,299,503	330,779,260
Medical and dental expenses deduction:					
Number of returns	577,473	1,325,425	944,692	145,625	151,342
Amount	10,474,920	25,293,765	19,278,187	4,424,901	6,665,795
Taxes paid deduction [5]:					
Number of returns	1,060,737	3,847,770	4,523,975	1,080,422	3,526,279
Amount	5,545,017	26,643,881	39,601,170	10,339,234	31,667,785
Income taxes [6]:					
Number of returns	618,882	2,764,275	3,524,562	858,812	2,765,493
Amount	1,402,426	10,909,980	27,242,328	10,786,238	191,724,922
General sales taxes [6]:					
Number of returns	388,409	964,192	918,365	207,328	716,565
Amount	594,210	1,677,556	2,009,737	576,596	3,109,332
Interest paid deduction:					
Number of returns	652,175	3,026,821	3,760,817	930,132	3,053,827
Amount	7,284,345	29,773,058	42,367,475	12,314,757	70,544,942
Total mortgage interest paid deduction:					
Number of returns	644,472	2,998,738	3,723,183	918,751	2,900,542
Amount	6,518,894	27,092,778	40,929,025	11,857,265	49,268,728
Charitable contributions deduction:					
Number of returns	783,475	2,957,765	3,801,298	952,536	3,175,196
Amount	3,960,120	17,297,117	33,050,363	10,653,343	200,232,864
Qualified business income deduction:					
Number of returns	3,406,559	6,338,816	6,788,194	1,553,245	4,413,999
Amount	6,195,041	17,903,017	30,440,725	10,285,441	139,017,107
Taxable income:					
Number of returns	28,800,456	37,442,594	24,161,639	3,725,015	7,882,787
Amount	639,279,718	1,912,915,663	2,687,808,279	714,927,085	5,534,328,337
Alternative minimum tax:					
Number of returns	* 117	9,187	23,412	10,714	209,628
Amount	* 4,324	57,121	174,999	153,759	5,482,200
Excess advance premium tax credit repayment [7]:					
Number of returns	802,744	914,478	283,769	28,357	51,446
Amount	546,030	1,512,504	1,027,666	170,919	382,677
Income tax before credits:					
Number of returns	28,608,222	37,356,979	24,143,813	3,723,906	7,880,400
Amount	69,666,376	242,223,006	408,154,070	128,578,290	1,404,113,056
Total tax credits [8]:					
Number of returns	13,325,570	16,837,873	13,135,094	2,335,332	4,942,519
Amount	18,469,983	40,057,485	39,825,810	5,089,377	39,755,651

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns			Tax year 2021, by size of adjusted gross income	
	Tax year 2020	Tax year 2021	Percent difference	Under $15,000 [1]	$15,000 under $30,000
	(1)	(2)	(3)	(4)	(5)
Child care credit:					
Number of returns	5,088,208	583,054	-88.5	* 994	32,078
Amount	2,841,865	1,072,876	-62.2	* 81	18,528
Credit for the elderly or disabled:					
Number of returns	44,389	37,350	-15.9	10,907	26,443
Amount	3,859	3,560	-7.7	1,562	1,998
Education tax credits:					
Number of returns	7,484,754	8,119,082	8.5	277,655	1,958,880
Amount	7,919,700	8,284,969	4.6	34,177	1,325,924
Retirement savings contributions credit:					
Number of returns	9,567,953	9,211,566	-3.7	232,180	3,500,430
Amount	1,785,015	1,762,904	-1.2	22,726	684,515
Adoption credit:					
Number of returns	57,021	74,761	31.1	* 928	2,365
Amount	321,242	350,126	9.0	* 56	896
Residential energy credits:					
Number of returns	2,293,297	2,626,873	14.5	* 2,185	135,228
Amount	3,894,398	5,480,776	40.7	* 819	71,475
Foreign tax credit:					
Number of returns	9,155,934	10,803,923	18.0	79,797	326,009
Amount	19,075,942	30,243,844	58.5	3,897	44,452
General business credit:					
Number of returns	419,651	511,511	21.9	611	18,688
Amount	4,478,091	6,862,281	53.2	27,375	16,255
Prior year minimum tax credit:					
Number of returns	136,218	125,435	-7.9	* 696	* 2,837
Amount	1,392,309	1,511,927	8.6	* 21	* 882
Nonrefundable child and other dependent tax credit:					
Number of returns	37,615,063	10,873,814	-71.1	40,468	1,141,128
Amount	78,965,342	7,742,397	-90.2	7,414	463,636
Total refundable credits:					
Number of returns	58,516,827	69,717,773	19.1	17,059,153	15,065,541
Amount	145,862,406	255,103,407	74.9	52,237,884	60,437,306
Total earned income credit (EIC):					
Number of returns	26,251,292	32,219,673	22.7	13,767,668	11,976,314
Amount	60,035,574	65,529,054	9.2	23,969,135	29,460,622
Total additional child tax credit including reconciliation for excess payments:					
Number of returns	N/A	40,081,611	[9]	5,020,247	7,064,268
Amount	N/A	122,124,345	[9]	16,579,271	22,622,058
Aggregate advance child tax credit amount received					
Number of returns	N/A	36,302,995	[9]	3,875,264	6,049,868
Amount	N/A	89,662,280	[9]	9,567,644	15,076,972
Total American opportunity credit:					
Number of returns	6,511,365	6,022,520	-7.5	1,017,041	1,436,186
Amount	5,667,491	5,166,538	-8.8	876,179	1,195,007
Total recovery rebate credit:					
Number of returns	31,058,505	11,601,187	-62.6	3,734,772	2,504,993
Amount	45,315,829	19,852,853	-56.2	6,335,470	4,021,981
Total net premium tax credit:					
Number of returns	2,277,307	4,371,196	91.9	1,090,346	1,404,154
Amount	2,129,615	3,510,106	64.8	653,366	830,580

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Tax year 2021, by size of adjusted gross income				
	$30,000 under $50,000	$50,000 under $100,000	$100,000 under $200,000	$200,000 under $250,000	$250,000 or more
	(6)	(7)	(8)	(9)	(10)
Child care credit:					
Number of returns	85,787	173,492	188,208	50,952	51,543
Amount	126,396	373,102	430,932	62,683	61,154
Credit for the elderly or disabled:					
Number of returns	0	0	0	0	0
Amount	0	0	0	0	0
Education tax credits:					
Number of returns	1,805,572	2,306,431	1,770,544	0	0
Amount	1,955,593	2,727,273	2,242,002	0	0
Retirement savings contributions credit:					
Number of returns	3,987,671	1,491,285	0	0	0
Amount	793,237	262,426	0	0	0
Adoption credit:					
Number of returns	21,084	29,098	16,928	4,187	* 172
Amount	39,611	109,640	157,509	40,919	* 1,495
Residential energy credits:					
Number of returns	374,063	894,805	817,398	145,091	258,103
Amount	369,747	1,473,346	2,087,356	462,065	1,015,968
Foreign tax credit:					
Number of returns	720,017	2,374,990	3,261,900	915,849	3,125,361
Amount	124,406	658,800	1,705,399	1,067,426	26,639,464
General business credit:					
Number of returns	28,528	62,202	88,954	28,070	284,458
Amount	40,772	162,399	364,591	114,814	6,136,075
Prior year minimum tax credit:					
Number of returns	7,372	12,063	17,960	8,831	75,676
Amount	6,757	22,590	76,087	53,510	1,352,080
Nonrefundable child and other dependent tax credit:					
Number of returns	2,378,233	3,631,708	3,124,950	557,327	0
Amount	1,509,139	2,743,343	2,569,966	448,899	0
Total refundable credits:					
Number of returns	10,114,321	11,657,383	8,921,384	1,356,076	5,543,915
Amount	42,955,354	40,406,230	31,323,732	4,097,553	23,645,348
Total earned income credit (EIC):					
Number of returns	6,127,972	347,719	0	0	0
Amount	11,904,821	194,476	0	0	0
Total additional child tax credit including reconciliation for excess payments:					
Number of returns	7,718,217	9,582,016	7,616,736	1,308,981	1,771,147
Amount	23,975,796	30,385,311	22,788,964	2,390,588	3,382,358
Aggregate advance child tax credit amount received					
Number of returns	6,943,897	8,920,198	7,244,155	1,260,142	2,009,473
Amount	17,742,107	23,229,687	18,184,625	2,388,686	3,472,560
Total American opportunity credit:					
Number of returns	1,101,401	1,301,666	1,166,226	0	0
Amount	906,083	1,121,355	1,067,914	0	0
Total recovery rebate credit:					
Number of returns	1,763,552	2,246,118	1,351,075	677	0
Amount	2,866,989	3,626,022	3,002,217	174	0
Total net premium tax credit:					
Number of returns	1,074,554	686,364	115,778	0	0
Amount	878,859	907,842	239,459	0	0

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued
[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	All returns			Tax year 2021, by size of adjusted gross income	
	Tax year 2020	Tax year 2021	Percent difference	Under $15,000 [1]	$15,000 under $30,000
	(1)	(2)	(3)	(4)	(5)
Total qualified sick and family leave credit for leave before April 1, 2021:					
Number of returns	987,812	1,170,088	18.5	421,658	306,148
Amount	1,840,557	4,737,342	157.4	2,119,135	912,056
Total refundable child and dependent care credit:					
Number of returns	N/A	5,925,692	[9]	356,432	809,813
Amount	N/A	12,626,890	[9]	724,619	1,867,698
Total qualified sick and family leave credit for leave after March 31, 2021:					
Number of returns	N/A	1,212,124	[9]	397,615	346,153
Amount	N/A	5,391,581	[9]	2,099,760	1,105,396
Total premium tax credit:					
Number of returns	4,311,926	7,407,859	71.8	1,509,922	2,079,111
Amount	33,030,180	52,201,790	58.0	11,298,915	14,444,127
Advance payment of premium tax credit:					
Number of returns	4,567,117	7,862,219	72.1	1,570,491	2,112,789
Amount	33,878,109	53,980,097	59.3	11,108,293	14,133,663
Self-employment tax:					
Number of returns	20,071,238	21,828,479	8.8	4,988,068	3,919,765
Amount	65,762,892	78,253,528	19.0	5,643,539	7,483,690
Total additional Medicare tax:					
Number of returns	5,129,682	6,074,412	18.4	20,640	4,620
Amount	11,290,042	14,720,295	30.4	40,769	2,330
Net investment income tax:					
Number of returns	5,635,964	7,253,461	28.7	* 44	1,248
Amount	34,613,614	59,808,216	72.8	* 2,795	144
Total income tax:					
Number of returns	102,995,456	104,931,244	1.9	1,311,726	12,849,671
Amount	1,681,950,997	2,176,392,007	29.4	534,617	12,032,611
Total tax liability:					
Number of returns	107,341,949	108,574,680	1.1	2,940,259	13,815,311
Amount	1,756,632,400	2,268,956,208	29.2	2,374,471	15,640,244

Footnotes at end of table.

Table 1. Individual Income Tax Returns, Preliminary Data for Tax Years 2020 and 2021, Selected Income and Tax Items, by Size of Adjusted Gross Income—Continued

[All figures are estimates based on samples—money amounts are in thousands of dollars]

Item	Tax year 2021, by size of adjusted gross income				
	$30,000 under $50,000	$50,000 under $100,000	$100,000 under $200,000	$200,000 under $250,000	$250,000 or more
	(6)	(7)	(8)	(9)	(10)
Total qualified sick and family leave credit for leave before April 1, 2021:					
Number of returns	190,651	166,014	61,404	7,721	16,492
Amount	739,358	698,763	196,393	22,887	48,750
Total refundable child and dependent care credit:					
Number of returns	1,019,705	1,323,697	1,658,456	322,678	434,913
Amount	2,326,310	3,196,224	3,566,548	403,848	541,644
Total qualified sick and family leave credit for leave after March 31, 2021:					
Number of returns	211,895	172,094	60,215	8,783	15,369
Amount	980,362	921,726	219,010	15,958	49,370
Total premium tax credit:					
Number of returns	2,013,770	1,507,104	297,952	0	0
Amount	13,789,735	10,750,183	1,918,830	0	0
Advance payment of premium tax credit:					
Number of returns	2,032,382	1,648,918	399,742	33,936	63,961
Amount	13,732,825	11,636,090	2,611,312	269,672	488,242
Self-employment tax:					
Number of returns	2,919,245	4,128,147	3,382,409	624,615	1,866,230
Amount	7,893,711	14,185,106	15,573,239	3,926,619	23,547,624
Total additional Medicare tax:					
Number of returns	3,438	14,153	333,406	765,933	4,932,222
Amount	2,151	8,274	84,469	186,549	14,395,753
Net investment income tax:					
Number of returns	2,595	5,781	121,362	558,097	6,564,334
Amount	736	4,075	65,759	289,032	59,445,674
Total income tax:					
Number of returns	21,156,791	34,198,559	23,821,648	3,716,228	7,876,621
Amount	50,661,760	200,702,476	367,380,001	123,562,607	1,421,517,935
Total tax liability:					
Number of returns	21,647,989	34,681,771	23,890,382	3,719,506	7,879,462
Amount	56,577,985	216,089,667	386,158,662	128,484,574	1,463,630,605

N/A—Not applicable.
* Estimate should be used with caution because of the small number of sample returns on which it is based.
[1] Includes returns with adjusted gross deficit.
[2] Not included in adjusted gross income (less deficit).
[3] Includes capital gain distributions reported on Form 1040 and Schedule D.
[4] The American Rescue Plan Act of 2021, which was passed on March 11, 2021, allowed for the exclusion of up to $10,200 of unemployment compensation. Therefore the Tax Year 2020 data will not include any unemployment income exclusion from returns filed previous to this date. The taxpayer would have filed an amended return to receive the exclusion. Also, the data for 2020 shown in the table is before any exclusions.
[5] The taxes paid deduction is the sum of state and local taxes deduction after limitation plus other taxes deduction.
[6] Data are prior to application of the $10,000 limit ($5,000 in the case of married individuals filing separate returns).
[7] The American Rescue Plan Act of 2021, which was passed on March 11, 2021, suspended the repayment of excess APTC amounts for 2020. Taxpayers who owed this repayment were instructed to delete the Form 8962. Taxpayers who had already filed their returns had this amount reimbursed but are included in the 2020 data in this table.
[8] Includes EIC, additional child tax credit, American opportunity credit, recovery rebate credit, net premium tax credit, qualified sick and family leave credits, and refundable child and dependent care credit, which are used to offset income tax before credits. Also includes other credits that are not shown separately in this table.
[9] Percentage not computed.
NOTES:

Detail may not add to totals because of rounding.

Definitions for items in the table can be found in the Explanation of terms section of Publication 1304 at: https://www.irs.gov/statistics/soi-tax-stats-individual-income-tax-returns-complete-report-publication-1304#_sec4.

These data represent estimates of income and tax items based on a sample of individual income tax returns filed between January and late September of a given processing year. These returns are then weighted to represent a full year of taxpayer reporting. In general, some of the returns processed during the remainder of the year may have somewhat different characteristics compared to these earlier ones. When available, the estimates from the "complete year data" should be used in place of the preliminary data.
SOURCE: IRS, Statistics of Income Division, Individual Income Tax Returns, Preliminary Data, May 2023.

Foreign Recipients of U.S. Income, Calendar Year 2019

by Scott Luttrell

U.S.-source income payments to foreign persons, as reported on Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding, rose to $1.1 trillion for calendar year (CY) 2019. This represents an increase of 6.2% from 2018. Withholding taxes on this income decreased by 1.4% as 89.8% of all U.S.-source income paid to foreign persons was exempt from withholding tax. U.S.-source income paid to foreign persons that was exempt from withholding increased by 8.6%, while income subject to withholding fell by 11.3% from 2018. Taxes on the residual U.S.-source income subject to tax were withheld at an average rate of 16.4%.

Background

Generally, a foreign person (see Explanation of Selected Terms at the end of this data release) is subject to U.S. tax on its U.S.-source income. Most types of U.S.-source income received by a foreign person are subject to U.S. tax of 30%. A reduced rate, including exemption, may apply if an Internal Revenue Code (IRC) section provides for a lower rate, or there is a tax treaty between the foreign person's country of residence and the United States. The tax is generally withheld from the payment made to the foreign person.

The term NRA (nonresident alien) withholding, also known as Chapter 3 withholding, is used in this area descriptively to refer to withholding required under IRC sections 1441, 1442, and 1443. Generally, NRA withholding describes the withholding regime that requires 30% withholding on a payment of U.S.-source income. Payments to all foreign persons, including nonresident alien individuals, and foreign entities and governments, may be subject to NRA withholding.

Entities such as financial institutions, businesses, and academic institutions that report U.S. payments to nonresident aliens are considered withholding agents. The IRC requires withholding agents to withhold tax from U.S. source fixed, determinable, annual, or periodic (FDAP) income paid to foreign persons. The withholding agent is required to report aggregate U.S.-source FDAP payments made, and any associated tax withheld in a calendar year, on Form 1042, Annual Withholding Tax Return for U.S.-Source Income of Foreign Persons. Furthermore, payments to foreign recipients are reported to the IRS on Form 1042-S; a copy is provided to the payee. Form 1042-S is used to report many types of income, including, but not limited to, interest, rents, royalties, corporate distributions, pension income, and gambling winnings.

Income subject to withholding

U.S.-source payments to foreign persons are commonly exempt from withholding tax. The primary reason for this is either a tax treaty between the United States and the recipient's country of residence or the specific type of income (portfolio or bank deposit interest, for instance) is exempt under an IRC section. Income effectively connected with a U.S. trade or business is also exempt from withholding. In 2019, just 10.2% ($115.0 billion) of total U.S.-source income payments to foreign persons was subject to tax.

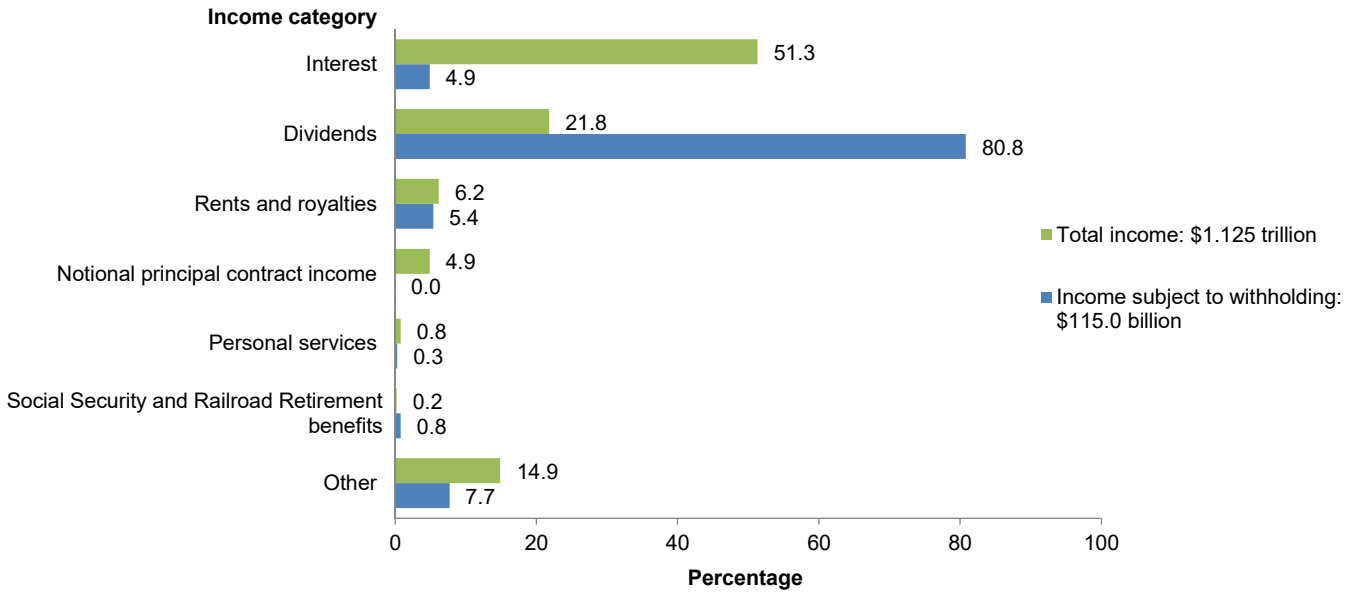
Figure A presents the percentages of U.S.-source income paid to foreign persons and income subject to withholding by income category in CY 2019. This figure illustrates the differences that exist with respect to the taxation of certain types of income. For example, dividends comprised a majority (80.8%) of income subject to tax, despite accounting for only 21.8% of total income. Dividend income subject to withholding was taxed at an average effective rate of 18.2%. While dividends are taxed at comparatively high rates, interest is much more likely to be exempt from withholding. For 2019, interest payments constituted the largest share of total income (51.3%) but made up only 4.9% of all U.S.-source income subject to withholding. Furthermore, although less than 1.0% of interest income was subject to withholding, it was taxed at an average rate of 15.2%. Notional principal contract income accounted for 4.9% of U.S.-source income paid to foreign persons; however, it is not generally subject to withholding tax. Rents and royalty payments are more likely to be taxed, and they accounted for 6.2% of all U.S.-source income and 5.4% of income subject to withholding.

Treaty vs. nontreaty countries

One of the primary reasons behind relatively low withholding tax rates on payments of U.S.-source income to foreign persons is reciprocal tax treaties. Some 66 countries had treaties in force with the United States (Table 1) in 2019. Nearly 75.3% of all payments reported on Form 1042-S went to recipients in treaty countries during 2019. Foreign recipients from tax treaty countries received 75.2% of total U.S. income paid to foreign persons and paid 68.0% of all withholding taxes on foreign-source income. Canadian recipients had the largest amount of U.S.-source income subject to tax among all treaty countries and paid 10.3% of the total withholding taxes. Recipients from Luxembourg paid the most taxes ($2.3 billion) of any treaty country, with an effective withholding tax rate of 28.5%. The effective withholding rate on payments to Luxembourg is much higher than the typical treaty county because the bulk of payments (92.8%) to Luxembourg are dividends. Recipients from Ireland (7.0%) and the United Kingdom (6.9%) each paid nearly $1.5 billion in withholding taxes during 2019. Recipients of U.S. income payments subject to withholding from treaty countries had taxes withheld at an average rate of 15.8%, compared to 28.3% on payments made to residents of nontreaty countries.

Figure A

Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Years 2019



NOTES: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding. Chapter 3 of the IRC (Sections 1441–1446) generally requires withholding at a rate of 30% on U.S. source, fixed or determinable, annual or periodic income paid to nonresident aliens.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2023.

Notional principal contract income

Notional principal contracts involve two parties who agree contractually to pay each other amounts at specified times based on the underlying notional amount. The underlying amount is notional because neither party to the notional principal contract is required to actually hold the property comprising the underlying amount. It is an amount specified in the contract, and based on that amount, certain calculations are made. Generally, when amounts under the contract are due at the same time, they are netted and only one payment is made. Notional principal contract income is not subject to withholding, but must be reported on Form 1042-S if the income was effectively connected with the conduct of a trade or business in the United States. Notional principal contracts are used by financial institutions to reduce the risk of changes in interest rates, commodity prices, and currency exchange rates. Interest rate swaps, currency swaps, and equity swaps are examples of notional principal contracts. In 2019, notional principal contract income ($54.7 billion) comprised 4.9% of all U.S.-source income paid to foreign persons and all of it was exempt from withholding tax.

During the 10-year period from 2010 to 2019, total U.S. source notional principal contract income received by foreign recipients declined both in real terms and as a share of the total gross income reported on Form 1042-S. At its peak, notional principal contract income accounted for 15.4% ($86.2 billion) of all income, but by 2019 it made up just 4.9% ($54.7 billion) of the total.

Notional Principal Contract Income as a Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Calendar Year

Residents in each of 16 nontreaty jurisdictions received more than $1 billion of U.S.-source income in 2019: the Bahamas, Bermuda, Brazil, the British Virgin Islands, the Cayman Islands, Chile, Colombia, Guernsey, Hong Kong, Jersey, Kuwait, Malaysia, Saudi Arabia, Singapore, Taiwan, and the United Arab Emirates. All nontreaty jurisdictions combined accounted for $279.0 billion of the total U.S.-source income received and $6.7 billion of the total tax withheld for the year.

Geographic focus

In CY 2019, most U.S.-source income paid to foreign persons (80.9%) was paid to recipients in just 13 countries (Figure B1). Foreign persons from the United Kingdom received $173.5 billion (15.4% of the total) in U.S.-source income payments, an increase of 12.3% from 2018. United Kingdom corporations received 19.7% of all payments to corporate recipients. Cayman Islands recipients of U.S.-source income collected $153.4 billion (13.6%), an increase of 40.7% from 2018. Recipients from Japan collected $110.8 billion (9.8%) and Canadian recipients collected $87.1 billion (7.7%). In addition, recipients from France ($73.2 billion), Switzerland ($53.8 billion), Luxembourg ($53.0 billion), China ($48.3 billion), and Ireland ($47.6 billion) each accounted for at least 4.0% of U.S.-source income paid to foreign persons in 2019.

Foreign recipients located in the 13 countries displayed in Figure B2, combined, paid $15.1 billion in withholding taxes (71.9% of the total) in 2019. Recipients in the Cayman Islands paid $3.1 billion in withholding taxes (14.5% of the total), the most of any country, which was an increase of 2.7% from 2018. Recipients from Luxembourg paid nearly $2.3 billion in withholding taxes (10.9% of the total), an increase of 1.2% from the previous year.

Types of U.S.-source income

The primary types of U.S.-source income paid to foreign recipients reported on Form 1042-S in 2019 were consistent with previous years (Figure C). Interest payments totaled $577.3 billion, which was an increase of 7.6% from 2018, and accounted for 51.3% of total gross income. Dividends paid to foreign persons rose by 1.2% to $245.2 billion and accounted for 21.8% of total gross income. Payments of rents and royalties to foreign persons totaled $69.5 billion or 6.2% of total gross income. Notional principal contract income totaled $54.7 billion in 2019 and all of it was exempt from withholding tax.

Additional Foreign Income and Withholding Data

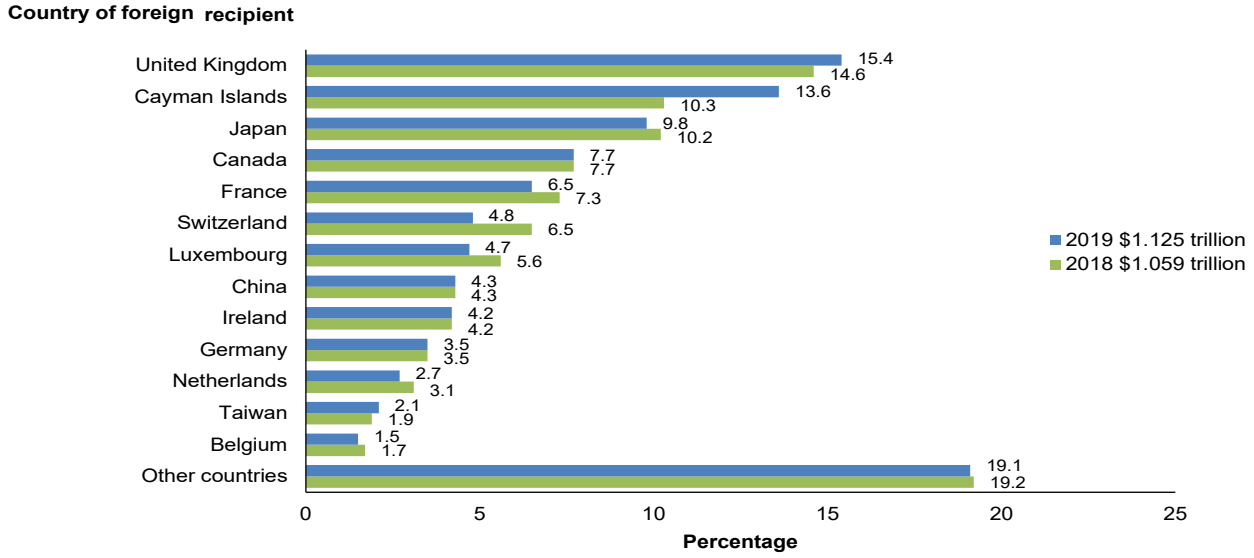
While the majority of U.S. income paid to foreign recipients is subject to withholding under Chapter 3 of the IRC and is reported on Form 1042-S, information from other tax forms is useful for providing a comprehensive look at withholding tax of foreign persons' U.S. income.

Foreign partner's partnership income

U.S.-partnership income that is allocable to foreign partners is reported on Form 8805, Foreign Partner's Information Statement of Section 1446 Withholding Tax. Partnerships are required to withhold income tax on effectively connected taxable income deemed allocable to foreign partners. A U.S. or foreign partnership will file Form 8805 to show the amount of taxable income

Figure B1

Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Country of Foreign Recipient, Calendar Years 2018 and 2019

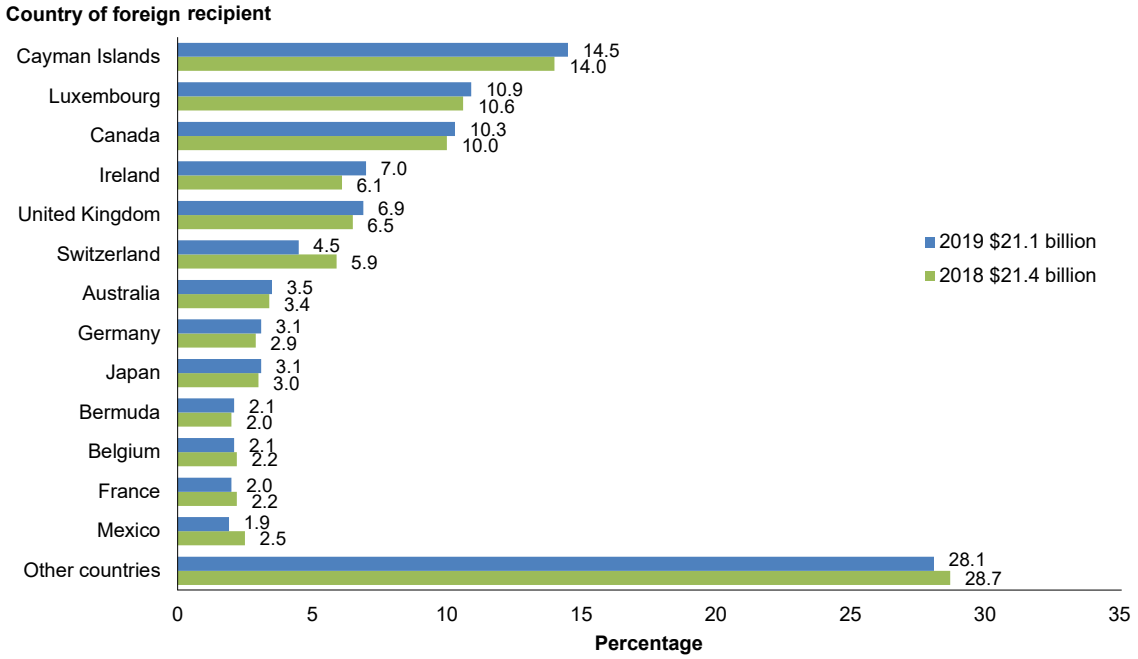


NOTES: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding. Chapter 3 of the IRC (Sections 1441–1446) generally requires withholding at a rate of 30% on U.S. source, fixed or determinable, annual or periodic income paid to nonresident aliens. Detail may not add to 100% due to rounding.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2023.

Figure B2

Percentage of Total Taxes Withheld on U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Country of Foreign Recipient, Calendar Years 2018 and 2019

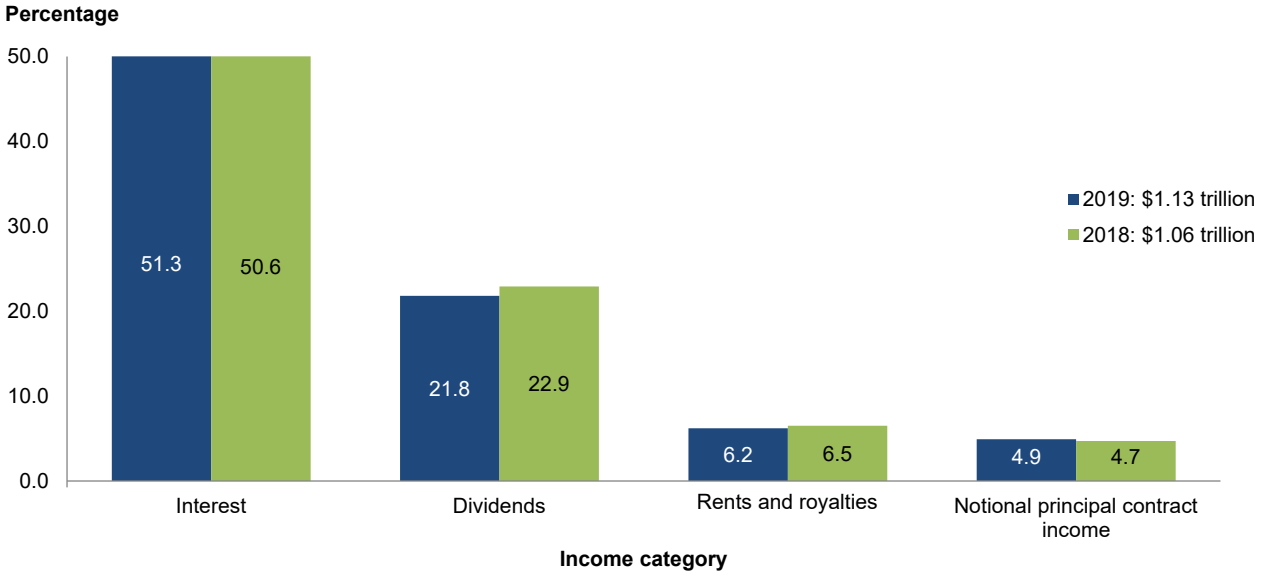


NOTES: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding. Chapter 3 of the IRC (Sections 1441–1446) generally requires withholding at a rate of 30% on U.S. source, fixed or determinable, annual or periodic income paid to nonresident aliens. Detail may not add to 100% due to rounding.

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2023.

Figure C

Percentage of Total U.S.-Source Income Paid to Foreign Persons Under Chapter 3, as Reported on Form 1042-S, by Selected Income Category, Calendar Years 2018 and 2019



NOTES: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding. Chapter 3 of the IRC (Sections 1441-1446) generally requires withholding at a rate of 30% on U.S. source, fixed or determinable, annual or periodic income paid to nonresident aliens.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2023.

and total tax allocable to the foreign partner for the partnership's tax year. The statutory withholding rate for partnership income allocable to corporate foreign partners is 21%; it is 37% for non-corporate partners. Reduced withholding rates may apply if the foreign partner is an individual and the specific type of income is among income that is subject to preferential rates. These types of income include capital gains, depreciation recapture, and collectibles gains.

Sales of U.S. real property

Another tax form that provides information about withholding on foreign persons' U.S. income is Form 8288-A, Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests. The Foreign Investment in Real Property Tax Act of 1980 was introduced to ensure that the United States collected a portion of the capital gains realized by foreigners from the sales of U.S. real property interests. Form 8288-A is used to report the sales price of U.S. real property sold by the foreign person and the tax withheld on that sales price. Typically, the sales price is subject to 15% withholding, although corporations may be taxed at rates up to 35% in certain circumstances. In some instances, the seller may elect to pay a 21% tax on the capital gain rather than a 15% withholding tax on the sales price. When a foreign person sells real property interests in the United States, the buyer of the property is responsible for collecting and remitting to the IRS the appropriate amount of withholding and filing the necessary tax forms.

Branch profits tax

A withholding tax equivalent on a foreign person's U.S. income in the form of a branch profits tax is reported on Form 1120-F, U.S. Income Tax Return of a Foreign Corporation. The branch profits tax was created to achieve neutrality for foreign investments in the United States through a U.S. branch or a U.S. subsidiary of a foreign parent corporation. While dividends paid by a U.S. subsidiary to its foreign parent corporation are subject to a 30% (or lower) withholding tax, profits of a U.S. branch of a foreign parent would not be subject to an equivalent tax absent the branch profits tax. The amount of income remitted by the U.S. branch to its foreign owner, known as the dividend equivalent amount, is reported on Form 1120-F, along with the associated tax on that amount (i.e., branch profits tax).

Effective withholding tax rates

The combined withholding tax on U.S.-source income paid to foreign persons for 2019 was $27.0 billion, with an average effective tax rate of 18.5% (Figure D). The effective withholding rates vary widely among the various tax forms. U.S. partnership income allocable to foreign partners is subject to significantly higher rates of withholding than other types of U.S. income, because it is not typically reduced by tax treaties and is far more likely to be taxed near the statutory tax rate. For 2019, the average effective withholding rate on U.S. partnership distributions to foreign partners was 30.7%. The 11.1% withholding rate on income from the sale of U.S. real property interests is comparatively low because the statutory rate for this type of income is just 15%. The average effective rate on foreign branch profits (14.9%) reported on Form 1120-F was less than the 30% statutory rate because recipients frequently qualify for reduced rates through tax treaties.

Real property sales

The seven states with the most U.S. real property interest sales in 2019 made up 74.6% of all transactions, 49.0% of the total sales revenue, and 52.6% of taxes withheld (Figure E). The largest number of real property sales occurred in Florida. In fact, Florida had more than the other top seven states combined in 2019. New York had the highest sales revenue ($1.13 million) per transaction, followed by California ($0.74 million). Many real property sales could not be assigned to a specific state for reasons including: the real property transaction involved the transfer of stock in a portfolio of real estate holdings not specific to a geographic area; or the transaction involved the sale of an ownership interest in an entity that controlled real estate in multiple locations in the United States.

Withholding Under Chapter 4

The Foreign Account Tax Compliance Act (FATCA) became U.S. federal law in 2010 as part of the Hiring Incentives to Restore Employment Act. Under FATCA, foreign financial institutions (FFI) and certain other nonfinancial foreign entities (NFFEs) are required to report on the foreign assets held by their U.S. account holders or be subject to withholding payments. FATCA requires U.S. withholding agents to withhold tax on: (a) certain payments to FFIs that do not agree to report specific information to the IRS regarding their U.S. account; and (b) certain payments to NFFEs that do not provide information on their substantial U.S. owners to withholding agents. Payments subject to withholding under FATCA are subject to the laws of Chapter 4 of the IRC, which were implemented beginning July 1, 2014.

Some 31.3% of the U.S.-source income reported under Chapter 4 was subject to withholding (Table 3), and the average withholding rate for these payments was 28.9%. Interest was the largest category of Chapter 4 income ($3.4 billion), and most of that (86.4%) was exempt from withholding. Dividends accounted for 59.2% of Chapter 4 income subject to withholding while interest payments accounted for 23.9%. Tax withheld on dividends (60.3%) and interest (23.2%) comprised most of the tax withheld on Chapter 4 payments.

Data Sources and Limitations

Because the populations of Forms 1042-S, 8805, and 8288-A were used for the statistics in this article, the data are not subject to sampling error. However, the data are subject to nonsampling error, including data entry and taxpayer reporting errors. Because the data were tested and adjusted to ensure that certain basic mathematical relationships held, as well as the calculation of the correct tax withheld, the possibility of error cannot be eliminated completely.

Figure D

U.S.-Source Income Payments to Foreign Persons: Number of Forms, Income, Tax Withheld, and Effective Tax Rate, by Form Type and Selected Country of Foreign Recipient, Calendar Year 2019

[Money amounts are in thousands of dollars]

Form type and selected country	All payments		Payments subject to withholding tax			
	Total number of forms	Income (less loss)	Number of forms [1]	Income [2]	U.S. tax withheld	Effective tax rate [3]
	(1)	(2)	(3)	(4)	(5)	(6)
All forms	**7,287,195**	**1,158,804,873**	**3,797,386**	**145,683,904**	**27,021,242**	**18.5**
Form 1042-S: All countries [4]	**7,109,642**	**1,125,665,809**	**3,639,264**	**114,969,306**	**21,104,721**	**18.4**
United Kingdom	669,796	173,497,716	332,608	9,518,473	1,452,384	15.3
Japan	319,938	110,761,234	89,156	7,429,113	664,269	8.9
Cayman Islands	169,813	153,409,200	37,288	10,402,617	3,070,599	29.5
Canada	725,547	87,094,260	399,003	16,957,461	2,183,693	12.9
Switzerland	97,607	53,847,976	44,574	7,245,221	959,089	13.2
Luxembourg	34,042	52,971,462	10,983	8,066,281	2,300,811	28.5
France	128,676	73,175,731	68,503	1,924,720	422,261	21.9
China	426,289	48,252,331	142,217	1,137,831	138,291	12.2
Germany	469,530	39,163,874	184,842	3,624,769	659,292	18.2
Ireland	106,738	47,629,231	60,353	7,195,403	1,467,250	20.4
Netherlands	105,577	30,611,509	50,369	2,248,378	246,990	11.0
Taiwan	201,121	23,245,310	123,454	992,019	292,762	29.5
Belgium	47,571	16,682,554	28,819	2,133,411	442,849	20.8
Singapore	155,186	13,539,476	90,250	1,096,842	324,669	29.6
Australia	252,205	14,452,992	192,137	5,666,467	735,239	13.0
South Korea	71,314	14,930,123	41,729	2,785,200	409,752	14.7
Bermuda	24,901	13,571,601	9,288	1,451,091	434,145	29.9
Form 8805: All countries [5]	**145,187**	**12,436,216**	**126,748**	**12,436,216**	**3,815,542**	**30.7**
United Kingdom	9,170	2,093,859	7,330	2,093,859	682,940	32.6
Canada	12,919	1,684,858	11,805	1,684,858	445,601	26.4
Germany	38,449	1,629,109	31,244	1,629,109	449,410	27.6
Cayman Islands	1,973	828,498	1,338	828,498	225,708	27.2
China	10,000	590,264	9,726	590,264	146,662	24.8
Liechtenstein	81	491,799	70	491,799	100,168	20.4
Israel	9,090	407,803	8,856	407,803	96,321	23.6
Denmark	519	304,519	388	304,519	86,084	28.3
Australia	1,980	304,299	1,635	304,299	112,990	37.1
Form 8288-A: All countries	**29,300**	**16,583,090**	**29,300**	**16,583,090**	**1,847,944**	**11.1**
Australia	595	3,661,092	595	3,661,092	305,200	8.3
Canada	9,753	2,806,166	9,753	2,806,166	319,826	11.4
United Kingdom	2,762	1,952,865	2,762	1,952,865	240,087	12.3
China	1,011	677,843	1,011	677,843	83,458	12.3
Taiwan	270	360,568	270	360,568	52,226	14.5
Germany	1,147	348,764	1,147	348,764	41,187	11.8
Cayman Islands	173	317,874	173	317,874	36,704	11.5
Switzerland	335	291,493	335	291,493	33,687	11.6
Hong Kong	307	287,234	307	287,234	38,289	13.3
Japan	1,757	1,384,657	1,757	1,384,657	184,715	13.3
Form 1120-F: Reporting branch profits tax	**3,066**	**4,119,758**	**2,074**	**1,695,292**	**253,035**	**14.9**

[1] Number of forms in this column includes returns with income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales revenue for Form 8288-A; and branch profits tax for Form 1120-F.
[2] Amounts in this column represent income subject to taxation for Form 1042-S; positive income (excluding losses) for Form 8805; sales revenue for Form 8288-A; and dividend equivalent amount subject to taxation for Form 1120-F.
[3] U.S. tax withheld (column 5) divided by income (column 4).
[4] Amounts shown are subject to withholding under Chapter 3; Chapter 4 amounts are shown separately in Table 3. Chapter 3 of the IRC (Sections 1441 –1446) generally requires withholding at a rate of 30 percent on U.S. source, fixed or determinable, annual or periodic income paid to nonresident aliens. Chapter 4 withholding requires a withholding agent to withhold 30% on withholdable payments made to an entity that is a foreign financial intermediary (FFI) unless the withholding agent is able to treat the FFI as a participating FFI, deemed-compliant FFI, or exempt beneficial owner. Chapter 4 withholding also applies to withholdable payments made to an entity that is a passive nonfinancial foreign entity (NFFE) that fails to identify its substantial U.S. owners (or to certify that it does not have any substantial U.S. owners).
[5] Income (less loss) for all payments (column 2) is less than income on payments subject to tax (column 4) because column 2 includes forms with losses.
NOTE: The titles of the forms are: Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding; Form 8805, Foreign Partner's Information Statement of Section 1446 Withholding Tax; Form 8288-A, Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests; and Form 1120-F, U.S. Income Tax Return of a Foreign Corporation.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2023.

Figure E

U.S. Real Property Interests Sold by Foreign Persons: Number of Forms 8288-A Filed, Total Sales Revenue, and Tax Withheld, by State Location of the Property, Calendar Year 2019

[Money amounts are in thousands of dollars]

State location of real property	Total number of forms	Total sales revenue	U.S. tax withheld
	(1)	(2)	(3)
Total	**29,300**	**16,583,090**	**1,847,944**
Florida	12,676	3,384,143	373,202
California	2,629	1,933,331	237,372
New York	888	999,109	121,166
Hawaii	2,031	565,585	82,863
Arizona	1,568	545,430	67,031
Texas	1,182	379,553	49,107
Washington	894	326,294	40,614
All others and nonallocable	7,432	8,449,645	876,589

NOTES: Form 8288-A, Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests, is filed by the buyer of U.S. real property sold by foreign persons. The buyer must withhold tax in accordance with Internal Revenue Code Section 1445. These data were not previously available on the IRS Tax Statistics webpage.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, August 2023.

The Form 1120-F statistics in this article are based on information reported on Form 1120-F corporation income tax returns that were included in the 2019 Statistics of Income sample of corporate returns. Because the estimates are based on a sample, they are subject to sampling error.[1]

Form 1042-S

Payers (or their authorized withholding agents) of most U.S.-source income to foreign persons must withhold tax in accordance with Internal Revenue Code Section 1441. Form 1042-S, Foreign Person's U.S.-Source Income Subject to Withholding, is filed by the payer to report this income and the U.S. tax withheld. Often a financial institution acts as the payer's withholding agent. The statistics in this data release were tabulated by calendar year, using all Forms 1042-S filed with the Internal Revenue Service during 2019. The data reflect the income that was paid and U.S. tax that was withheld for 2019.

Form 8805

Domestic partnerships (or their authorized withholding agents) must withhold tax in accordance with Internal Revenue Code Section 1446 on distributions made to foreign partners. Form 8805, Foreign Partner's Information Statement of Section 1446 Withholding Tax, is filed by the payer to report income paid by U.S. partnerships to their foreign partners and the U.S. tax withheld. The statistics in this data release were tabulated by calendar year using all Forms 8805 filed with the Internal Revenue Service during 2019. The data reflect both the income paid and U.S. tax withheld for 2019.

Form 8288-A

Purchasers of U.S. real property held by foreign persons must withhold tax in accordance with Internal Revenue Code Section 1445. Form 8288-A, Statement of Withholding on Dispositions by Foreign Persons of U.S. Real Property Interests, is filed by the buyer of U.S. real property sold by foreign persons. The statistics in this data release were tabulated by calendar year using all Forms 8288-A filed with the Internal Revenue Service with a date of transfer occurring during 2019.

Form 1120-F

In accordance with Section 884(a), the Internal Revenue Code imposes a 30% branch-profits tax on after-tax earnings of a foreign corporation's U.S. trade or business that are not reinvested in a U.S. trade or business by the close of the tax year or are disinvested in a later tax year. Form 1120-F, U.S. Income Tax Return of a Foreign Corporation, is filed by the foreign corporation. The statistics in this data release were tabulated based upon all Forms 1120-F included in the tax year 2019 SOI Corporation Income Tax Return sample.

Explanation of Selected Terms

Foreign persons—For purposes of this data release, foreign persons include: (a) individuals whose residence is not within the United States and who are not U.S. citizens (i.e., nonresident aliens); and (b) corporations and other organizations (including partnerships, private foundations, estates, and trusts) created or organized outside the United States. Individuals residing, and organizations created or organized, in Puerto Rico and U.S. possessions are also considered foreign persons.

U.S. branch treated as U.S. person—The following types of U.S. branches (of foreign entities) may reach an agreement with a withholding agent to treat a branch as a U.S. person: (a) a U.S. branch of a foreign bank subject to regulatory supervision by the Federal Reserve Board; or (b) a U.S. branch of a foreign insurance company required to file an annual statement on a form approved by the National Association of Insurance Commissioners with the Insurance Department of a state, territory, or the District of Columbia.

Withholding rate pool—A withholding rate pool is a payment of a single type of income, determined in accordance with the categories of income reported on Form 1042-S that is subject to a single rate of withholding.

Scott Luttrell is an economist with the International Returns Analysis Section, Corporation, Partnership, & International Branch. This data release was prepared under the direction of Nuria McGrath, Chief.

[1] For a more complete description of the SOI Corporation Income Tax Return Sample, see https://www.irs.gov/pub/irs-pdf/p16.pdf#page=10.

Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Non-Tax Treaty Countries, Calendar Year 2019
[Money amounts are in thousands of dollars]

Treaty status and country	Number of Forms 1042-S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	**7,109,642**	**1,125,665,809**	**1,010,696,504**	**114,969,306**	**21,104,721**
Tax treaty countries, total	**5,350,137**	**846,678,179**	**755,535,114**	**91,143,065**	**14,360,699**
Armenia	1,574	19,605	16,210	3,395	764
Australia [1]	252,679	14,462,839	8,794,210	5,668,629	735,845
Austria	34,167	2,061,097	1,495,645	565,452	90,273
Azerbaijan	1,502	15,983	14,962	1,021	206
Bangladesh	29,716	59,330	52,389	6,940	1,016
Barbados	3,954	2,904,225	2,835,681	68,544	13,613
Belarus	7,170	51,622	47,991	3,631	931
Belgium	47,571	16,682,554	14,549,143	2,133,411	442,849
Bulgaria	9,232	82,419	27,683	54,736	4,371
Canada	725,547	87,094,260	70,136,799	16,957,461	2,183,693
China	426,289	48,252,331	47,114,500	1,137,831	138,291
Cyprus	5,552	383,867	308,671	75,197	12,942
Czech Republic	27,384	965,399	887,732	77,667	12,897
Denmark	29,299	5,909,244	4,846,597	1,062,647	166,641
Egypt	12,228	112,336	97,858	14,478	2,873
Estonia	6,375	37,778	22,290	15,488	2,432
Finland	18,160	2,019,834	1,756,199	263,635	39,320
France [2]	128,807	73,176,409	71,251,118	1,925,290	422,411
Georgia	1,499	41,476	38,736	2,740	658
Germany	469,530	39,163,874	35,539,105	3,624,769	659,292
Greece	23,709	198,332	136,561	61,771	15,715
Hungary	14,185	2,832,389	2,487,153	345,235	22,031
Iceland	3,263	94,261	75,044	19,217	4,577
India	239,898	11,715,324	10,960,272	755,052	127,181
Indonesia	19,674	792,643	772,234	20,409	3,576
Ireland	106,738	47,629,231	40,433,827	7,195,403	1,467,250
Israel	97,331	4,330,668	2,833,750	1,496,918	309,086
Italy	105,810	4,462,454	2,809,956	1,652,498	171,210
Jamaica	7,158	210,270	186,481	23,789	4,550
Japan	319,938	110,761,234	103,332,121	7,429,113	664,269
Kazakhstan	4,880	53,124	47,983	5,141	936
Korea, Republic of (South)	71,314	14,930,123	12,144,924	2,785,200	409,752
Kyrgyzstan	547	1,309	812	497	79
Latvia	4,054	100,830	82,027	18,803	3,154
Lithuania	5,424	49,911	42,144	7,767	1,287
Luxembourg	34,042	52,971,462	44,905,181	8,066,281	2,300,811
Malta	4,628	221,684	84,161	137,522	16,198
Mexico	345,440	8,954,369	6,216,770	2,737,599	400,610
Moldova	1,651	23,307	21,796	1,511	342
Morocco	4,044	102,014	97,437	4,577	795
Netherlands	105,577	30,611,509	28,363,131	2,248,378	246,990
New Zealand	40,406	892,784	598,785	293,999	40,571
Norway	30,532	10,897,949	10,484,819	413,130	73,407
Pakistan	9,761	49,683	32,837	16,845	2,744
Philippines	39,054	1,180,289	1,025,337	154,953	40,022
Poland	54,784	995,287	780,634	214,654	37,879
Portugal	17,978	301,663	178,294	123,369	16,557
Romania	14,342	182,607	157,577	25,030	4,079
Russia	208,516	589,941	522,970	66,970	11,339

Footnotes at end of table.

Table 1. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Tax Treaty Countries and Total Non-Tax Treaty Countries, Calendar Year 2019—Continued
[Money amounts are in thousands of dollars]

Treaty status and country	Number of Forms 1042-S	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Slovak Republic	8,327	99,944	72,571	27,373	6,069
Slovenia	6,258	55,290	17,564	37,726	6,056
South Africa	45,641	589,160	344,005	245,155	39,428
Spain	109,520	6,508,637	4,665,004	1,843,633	213,987
Sri Lanka	2,308	58,922	54,678	4,244	701
Sweden	39,782	9,368,124	7,555,399	1,812,725	279,805
Switzerland	97,607	53,847,976	46,602,755	7,245,221	959,089
Tajikistan	459	1,516	901	615	115
Thailand	34,994	2,061,405	1,901,242	160,163	25,556
Trinidad and Tobago	9,804	319,449	287,591	31,858	9,224
Tunisia	2,095	15,663	13,600	2,063	419
Turkey	23,120	236,036	96,494	139,542	21,646
Turkmenistan	287	758	475	283	41
Ukraine	26,942	55,788	27,736	28,052	4,291
United Kingdom	669,796	173,497,716	163,979,242	9,518,473	1,452,384
Uzbekistan	941	2,318	1,097	1,221	250
Venezuela	99,343	326,346	266,222	60,124	13,322
Non-tax treaty countries, total [3]	**1,759,505**	**278,987,630**	**255,161,390**	**23,826,241**	**6,744,022**

[1] Includes the following countries which are part of the same tax treaty: Ashmore and Cartier Islands, Christmas Island, Cocos (Keeling) Islands, Coral Sea Islands Territory, and Norfolk Island. These countries are not included with Australia in Table 2.
[2] Includes the following countries which are part of the same tax treaty: Guadeloupe, French Guiana, Martinique, and Reunion. These countries are not included with France in Table 2.
[3] Includes Puerto Rico and U.S. possessions. The U.S. and Bermuda have had a tax treaty in effect since 1986, however, this treaty provides no reduction of withholding rates.
NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled "Foreign Person's U.S.-Source Income Subject to Withholding." Chapter 3 withholding describes the withholding regime that requires withholding on a payment of U.S.-source income. Payments to foreign persons, including nonresident alien individuals, foreign entities, and governments, may be subject to Chapter 3 withholding.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2021.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019
[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Total	**7,109,642**	**21,104,721**	**1,125,665,809**	**577,342,319**	**245,194,271**	**69,535,524**	**2,242,544**	**8,472,183**	**54,730,119**
RECIPIENT TYPES									
Individuals	5,456,187	1,579,649	15,751,990	2,755,916	3,435,893	1,693,707	2,242,544	1,244,661	0
Corporations	810,446	12,067,047	702,821,916	343,414,667	134,713,323	54,947,917	0	6,245,053	53,057,238
Partnerships and trusts	184,442	869,572	32,028,557	14,528,010	12,065,956	889,985	0	374,905	1,371
U.S. branches treated as U.S. persons	2,195	52,324	50,897,523	33,981,893	7,365,011	21,597	0	27,028	1,255,051
Governments and international organizations	61,577	41,304	152,505,395	110,026,283	28,798,189	174,987	0	28,481	9
Hybrid entity making treaty claim	2,292	125,161	16,620,201	3,746,326	4,438,573	2,937,100	0	139,062	0
Withholding foreign partnerships and trusts	5,993	7,492	6,256,318	2,764,691	1,857,318	33,949	0	39,530	103,536
Artists and athletes [1]	36,089	291,306	1,246,470	1,037	1,248	126,112	0	5,070	0
Withholding rate pools (general)	29,941	5,615,994	97,378,603	50,246,054	40,475,938	195,664	0	13,852	0
Withholding rate pools (tax-exempt)	901	1,129	16,561,881	7,176,149	7,967,501	2	0	0	0
Pensions	7,525	74,243	2,800,604	564,612	367,730	2,035	0	730	0
Other and unknown	512,054	379,499	30,796,352	8,136,680	3,707,590	8,512,468	0	353,811	312,913
SELECTED COUNTRIES AND RECIPIENT TYPES									
Argentina	111,672	37,363	589,675	360,581	67,874	36,825	7,692	10,928	0
Individuals	103,323	20,372	280,188	195,164	46,352	3,671	7,692	3,623	0
Corporations	2,653	12,480	96,414	50,969	14,865	13,329	0	5,741	0
Withholding rate pools (general)	17	42	458	299	133	0	0	0	0
Australia	252,205	735,239	14,452,992	5,970,529	5,161,928	951,819	45,169	54,640	31,331
Individuals	161,572	49,916	348,930	19,298	108,316	56,927	45,169	12,113	0
Corporations	17,316	369,860	8,517,966	3,956,185	2,157,899	829,257	0	35,517	31,331
Withholding rate pools (general)	80	10,974	72,784	11,786	59,076	0	0	0	0
Austria	34,167	90,273	2,061,097	968,902	522,614	331,649	10,496	42,381	0
Individuals	27,187	10,952	88,539	7,985	18,622	7,163	10,496	2,998	0
Corporations	1,862	18,651	1,018,147	513,167	205,270	182,997	0	9,292	0
Withholding rate pools (general)	1,694	51,612	603,045	344,525	247,253	456	0	0	0
Bahamas	24,504	115,116	1,636,576	1,063,676	380,242	4,969	699	12,396	0
Individuals	3,507	3,803	23,827	8,526	5,230	238	699	706	0
Corporations	19,226	77,105	1,284,115	867,678	264,433	3,918	0	29	0
Withholding rate pools (general)	250	17,788	190,987	128,048	57,642	11	0	0	0
Bahrain	2,251	1,399	215,355	54,016	15,207	329	25	194	0
Individuals	1,739	514	2,906	381	906	81	25	1	0
Corporations	311	866	162,283	20,228	1,874	233	0	160	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Barbados	3,954	13,613	2,904,225	552,087	35,972	7,046	1,274	258	0
Individuals	1,894	806	8,095	2,186	917	603	1,274	153	0
Corporations	1,637	12,029	2,883,981	542,932	33,431	4,179	0	22	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Belgium	47,571	442,849	16,682,554	11,079,413	4,344,072	419,184	9,480	39,142	374
Individuals	38,540	11,174	99,521	8,468	35,813	8,885	9,480	11,213	0
Corporations	3,204	12,348	5,811,663	4,772,265	480,858	384,830	0	25,295	374
Withholding rate pools (general)	355	415,649	7,453,796	4,166,431	2,933,148	71	0	0	0
Bermuda	24,901	434,145	13,571,601	10,750,891	1,353,795	40,949	1,795	12,064	0
Individuals	6,810	6,168	42,607	16,821	15,180	639	1,795	1,614	0
Corporations	14,782	371,432	11,621,653	10,149,988	1,049,905	34,445	0	9,014	0
Withholding rate pools (general)	33	1,385	101,740	35,259	8,581	0	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued
[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Brazil	108,321	81,579	6,919,348	6,509,110	103,427	91,797	5,782	18,670	19
Individuals	91,735	32,435	197,006	53,763	47,153	21,411	5,782	12,334	0
Corporations	3,975	41,469	444,958	246,617	51,530	35,688	0	1,974	19
Withholding rate pools (general)	18	5	107	89	14	0	0	0	0
British Virgin Islands	104,376	313,819	5,086,298	3,276,668	935,395	32,634	253	122	0
Individuals	935	588	6,867	4,804	800	80	253	7	0
Corporations	101,501	306,188	4,976,747	3,209,635	917,297	28,043	0	115	0
Withholding rate pools (general)	6	45	862	d	d	d	0	0	0
Brunei	984	494	104,997	44,203	49,737	32	0	0	0
Individuals	658	63	346	47	133	19	0	0	0
Corporations	19	85	376	48	107	0	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Canada	725,547	2,183,693	87,094,260	32,279,709	23,286,199	3,013,714	442,136	1,229,805	6,438,177
Individuals	541,952	182,770	1,817,506	62,269	198,198	192,534	442,136	101,840	0
Corporations	80,154	770,819	51,058,658	20,999,512	8,636,259	2,129,318	0	1,046,998	6,322,434
Withholding rate pools (general)	836	1,067,897	15,330,150	5,002,929	9,115,445	4,602	0	0	0
Cayman Islands	169,813	3,070,599	153,409,200	113,375,359	10,968,161	98,928	791	49,318	16,539,883
Individuals	2,273	3,312	51,602	39,272	9,314	307	791	29	0
Corporations	157,267	2,993,325	144,604,406	107,851,364	8,816,760	82,790	0	2,469	16,538,959
Withholding rate pools (general)	100	3,668	96,853	80,501	16,076	0	0	0	0
Chile	30,065	164,484	1,714,943	822,485	532,550	12,488	8,470	3,113	12,944
Individuals	20,038	9,441	65,970	27,271	12,982	1,310	8,470	1,648	0
Corporations	7,868	131,572	949,705	244,820	426,965	2,269	0	726	12,944
Withholding rate pools (general)	4	0	3	d	d	d	0	0	0
China	426,289	138,291	48,252,331	40,797,947	3,510,223	1,782,307	529	487,420	21,501
Individuals	403,762	38,861	1,100,777	253,131	116,844	38,861	529	459,620	0
Corporations	3,971	84,080	3,222,885	2,356,475	118,795	242,274	0	20,226	21,501
Withholding rate pools (general)	51	286	4,262	838	2,689	97	0	0	0
Colombia	37,204	94,564	1,464,610	886,503	276,660	31,453	11,264	11,172	0
Individuals	29,188	9,691	65,177	20,351	8,130	3,373	11,264	2,061	0
Corporations	3,838	45,826	480,502	171,108	132,313	10,075	0	6,307	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Costa Rica	14,275	8,164	205,215	73,880	15,335	87,324	8,437	1,493	0
Individuals	11,453	4,652	31,337	8,256	3,732	389	8,437	1,055	0
Corporations	1,844	3,129	135,233	33,936	9,300	86,168	0	224	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Curacao	9,473	23,871	555,849	230,308	271,526	4,325	109	67	0
Individuals	4,937	7,620	31,326	2,855	3,285	29	109	62	0
Corporations	2,532	6,949	100,095	67,973	20,870	295	0	5	0
Withholding rate pools (general)	43	4,804	367,963	121,415	236,885	1,235	0	0	0
Cyprus	5,552	12,942	383,867	93,765	31,648	160,422	755	6,458	0
Individuals	3,384	1,075	10,896	3,334	2,481	646	755	1,182	0
Corporations	1,901	6,442	228,758	72,586	18,745	48,804	0	5,205	0
Withholding rate pools (general)	30	1,767	13,514	5,399	5,995	0	0	0	0
Czech Republic	27,384	12,897	965,399	535,922	110,662	189,381	2,372	8,366	0
Individuals	23,492	3,509	29,933	2,714	7,518	4,020	2,372	3,185	0
Corporations	842	3,717	96,390	14,404	18,661	41,562	0	4,100	0
Withholding rate pools (general)	74	3,947	46,500	21,158	24,573	8	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued

[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Denmark	29,299	166,641	5,909,244	1,974,971	2,274,790	878,459	8,485	58,099	0
Individuals	16,441	23,580	210,424	27,871	126,063	7,604	8,485	1,497	0
Corporations	4,570	77,627	4,211,505	1,322,236	1,520,020	820,473	0	49,022	0
Withholding rate pools (general)	234	60,239	578,147	151,247	403,140	61	0	0	0
Dominican Republic	10,873	8,694	119,679	82,961	4,667	4,915	7,679	3,433	0
Individuals	9,250	5,434	37,164	14,571	3,146	2,028	7,679	1,885	0
Corporations	485	680	17,264	12,761	1,010	2,230	0	10	0
Withholding rate pools (general)	13	67	234	7	218	0	0	0	0
East Timor	228	134	260,398	171,717	86,865	204	0	130	0
Individuals	196	133	951	12	5	139	0	130	0
Corporations	4	0	125	102	0	15	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Egypt	12,228	2,873	112,336	79,642	5,630	1,502	94	7,799	0
Individuals	11,303	2,432	29,256	1,958	5,371	1,002	94	6,937	0
Corporations	127	102	2,972	265	20	248	0	696	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Finland	18,160	39,320	2,019,834	894,517	668,406	253,825	3,856	17,107	0
Individuals	12,652	2,607	19,474	593	2,739	3,828	3,856	690	0
Corporations	3,062	29,449	1,284,140	472,721	442,111	226,937	0	15,739	0
Withholding rate pools (general)	57	5,787	46,098	7,694	38,151	8	0	0	0
France	128,676	422,261	73,175,731	37,746,736	12,492,623	3,309,325	46,822	192,105	8,564,152
Individuals	99,908	43,992	385,065	58,038	69,416	49,734	46,822	54,252	0
Corporations	11,585	63,175	36,211,447	14,404,660	5,989,256	3,039,379	0	130,651	8,482,991
Withholding rate pools (general)	1,485	299,507	4,445,054	2,940,792	1,134,746	172	0	0	0
Gabon	1,898	1,158	300,240	50,630	1,005	9,745	1	138,244	21,652
Individuals	1,492	245	7,629	172	145	1,256	1	39	0
Corporations	228	642	239,351	46,130	91	7,630	0	137,856	21,652
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Germany	469,530	659,292	39,163,874	15,266,769	9,222,816	8,413,444	150,970	204,130	367,152
Individuals	401,701	67,362	1,026,223	99,147	319,915	186,127	150,970	42,960	0
Corporations	31,094	287,768	29,472,672	9,887,207	6,686,429	7,948,857	0	144,682	366,753
Withholding rate pools (general)	10,321	283,107	4,410,034	2,221,427	1,820,688	863	0	0	0
Greece	23,709	15,715	198,332	61,257	13,655	7,488	35,291	4,720	0
Individuals	22,047	13,945	75,881	8,223	9,026	3,373	35,291	3,570	0
Corporations	464	1,002	83,434	18,891	3,381	3,328	0	937	0
Withholding rate pools (general)	6	2	2,431	2,420	d	d	0	0	0
Guatemala	14,558	7,959	280,198	192,973	4,686	55,713	2,918	1,877	0
Individuals	11,765	6,106	35,964	11,890	3,648	709	2,918	617	0
Corporations	565	510	65,559	7,539	985	54,524	0	152	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Guernsey	13,105	161,747	1,932,302	1,038,982	522,152	1,114	142	1	0
Individuals	325	195	5,640	2,317	329	162	142	1	0
Corporations	10,506	134,697	1,495,423	895,084	387,420	625	0	0	0
Withholding rate pools (general)	159	18,069	160,905	47,242	92,260	1	0	0	0
Honduras	10,508	6,377	149,374	123,943	1,306	261	1,469	518	0
Individuals	8,427	4,853	24,165	5,983	771	201	1,469	205	0
Corporations	212	300	90,665	89,457	415	1	0	39	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Hong Kong	96,495	379,181	9,935,257	7,311,896	1,789,702	104,490	2,537	19,338	8
Individuals	84,971	53,923	322,960	83,066	145,274	6,324	2,537	7,239	0
Corporations	5,306	128,037	2,775,819	2,147,214	236,336	27,293	0	7,532	8
Withholding rate pools (general)	616	173,097	2,461,629	1,764,640	681,338	73	0	0	0
Hungary	14,185	22,031	2,832,389	2,131,864	248,021	94,190	3,090	3,662	0
Individuals	11,659	2,205	21,435	1,181	4,394	4,076	3,090	1,841	0
Corporations	775	3,747	1,299,256	1,179,841	29,753	80,505	0	1,198	0
Withholding rate pools (general)	7	0	4	2	d	2	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued
[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
India	239,898	127,181	11,715,324	3,241,376	412,583	727,125	5,205	1,681,353	0
Individuals	191,553	36,816	255,901	15,513	53,242	12,207	5,205	33,137	0
Corporations	3,382	80,810	6,714,936	208,071	344,135	339,316	0	1,621,850	0
Withholding rate pools (general)	7	30	187	0	15	172	0	0	0
Indonesia	19,674	3,576	792,643	761,805	7,834	7,103	598	3,107	0
Individuals	18,384	2,551	23,185	2,627	4,921	4,294	598	1,471	0
Corporations	334	325	36,306	32,535	1,309	794	0	1,287	0
Withholding rate pools (general)	d	d	d	d	d	0	0	0	0
Iraq	1,450	683	593,515	590,024	21	52	0	8	0
Individuals	1,424	483	2,911	117	21	50	0	8	0
Corporations	12	199	695	4	0	1	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Ireland	106,738	1,467,250	47,629,231	28,513,426	6,635,659	6,652,605	28,371	894,538	306
Individuals	76,180	10,441	124,430	6,794	45,909	13,740	28,371	2,968	0
Corporations	21,429	1,413,274	40,272,087	26,241,396	6,391,360	2,773,123	0	760,378	306
Withholding rate pools (general)	70	8,456	54,036	6,811	29,913	1,771	0	0	0
Israel	97,331	309,086	4,330,668	2,641,249	966,070	260,847	17,138	43,596	0
Individuals	74,393	32,151	343,919	115,037	57,671	82,285	17,138	22,484	0
Corporations	13,971	111,299	1,549,405	889,475	278,214	146,191	0	19,226	0
Withholding rate pools (general)	257	133,656	1,293,819	721,082	520,810	60	0	0	0
Italy	105,810	171,210	4,462,454	1,714,465	1,193,824	431,802	95,380	78,539	78,386
Individuals	88,610	14,806	311,735	26,922	37,072	24,239	95,380	31,263	0
Corporations	5,466	95,578	2,499,900	572,412	731,822	370,810	0	44,187	53,221
Withholding rate pools (general)	1,396	47,599	1,008,607	652,506	341,062	241	0	0	0
Ivory Coast	1,141	276	131,377	121,042	9,135	111	9	489	0
Individuals	1,090	127	969	217	44	101	9	15	0
Corporations	13	3	4,893	4,882	1	10	0	0	0
Withholding rate pools (general)	d	d	d	0	d	d	0	0	0
Jamaica	7,158	4,550	210,270	173,118	5,039	12,117	4,085	3,435	0
Individuals	5,429	2,584	18,197	2,361	1,493	1,289	4,085	1,350	0
Corporations	664	809	164,825	158,218	3,263	934	0	6	0
Withholding rate pools (general)	d	d	d	0	0	d	0	0	0
Japan	319,938	664,269	110,761,234	53,073,059	22,077,262	15,323,364	405,163	128,029	2,205,249
Individuals	278,890	23,559	878,558	35,044	99,324	164,766	405,163	34,528	0
Corporations	16,587	292,641	64,192,361	25,658,303	11,443,296	14,495,457	0	84,878	1,277,111
Withholding rate pools (general)	1,074	337,143	18,801,935	8,144,745	8,930,962	59,261	0	0	0
Jersey	8,160	86,778	1,148,538	742,451	255,742	1,368	206	616	0
Individuals	543	817	163,032	160,083	2,051	144	206	482	0
Corporations	5,073	63,426	801,983	506,424	150,958	1,130	0	130	0
Withholding rate pools (general)	555	14,553	107,747	49,980	56,529	15	0	0	0
Korea, Republic of (South)	71,314	409,752	14,930,123	6,672,826	3,443,451	1,398,197	20,966	59,765	0
Individuals	57,479	19,250	168,822	16,663	24,000	15,653	20,966	36,715	0
Corporations	4,141	332,644	5,529,454	1,907,941	723,204	1,280,618	0	21,765	0
Withholding rate pools (general)	252	23,414	793,895	592,793	188,803	28	0	0	0
Kuwait	6,582	4,940	6,657,843	1,725,550	3,471,827	1,071	0	477	0
Individuals	3,820	1,891	11,386	4,163	3,836	841	0	477	0
Corporations	621	2,348	95,360	81,881	8,519	17	0	0	0
Withholding rate pools (general)	d	0	d	d	0	0	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued
[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Latvia	4,054	3,154	100,830	74,354	7,052	7,887	154	3,568	0
Individuals	3,563	1,322	10,268	908	3,182	1,015	154	893	0
Corporations	274	946	15,359	4,755	822	6,777	0	2,598	0
Withholding rate pools (general)	7	91	764	440	d	0	0	0	0
Liberia	1,034	4,214	185,167	96,602	11,554	34,992	172	11	0
Individuals	403	170	1,275	310	5	12	172	6	0
Corporations	612	2,803	177,955	95,650	7,539	34,919	0	5	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Liechtenstein	1,709	57,662	433,585	234,740	164,529	15,042	48	3,556	0
Individuals	280	140	1,252	456	525	2	48	23	0
Corporations	613	8,299	49,410	16,787	14,819	12,871	0	3,533	0
Withholding rate pools (general)	166	22,201	213,702	133,203	77,197	30	0	0	0
Luxembourg	34,042	2,300,811	52,971,462	35,312,052	11,452,451	811,190	767	21,269	76
Individuals	3,074	805	13,959	3,926	2,765	952	767	139	0
Corporations	28,199	1,568,582	37,831,385	25,535,286	6,766,223	696,734	0	20,994	0
Withholding rate pools (general)	1,102	719,046	9,634,000	6,734,595	2,533,380	157	0	0	0
Macau	1,705	1,555	350,285	73,123	66,827	178,826	11	646	0
Individuals	1,503	941	4,957	1,667	732	16	11	83	0
Corporations	62	202	14,773	14,134	547	8	0	3	0
Withholding rate pools (general)	d	d	d	0	0	d	0	0	0
Malaysia	67,450	16,599	1,039,656	813,209	137,064	6,408	907	2,261	0
Individuals	62,758	9,087	44,816	8,528	24,633	1,922	907	86	0
Corporations	669	2,706	62,322	36,641	5,139	2,864	0	2,056	0
Withholding rate pools (general)	3	10	35	0	35	0	0	0	0
Malta	4,628	16,198	221,684	156,706	35,620	4,763	2,576	5,705	0
Individuals	2,753	1,644	17,625	4,884	3,349	276	2,576	239	0
Corporations	1,619	13,062	175,569	129,244	28,373	4,455	0	5,284	0
Withholding rate pools (general)	52	555	18,388	15,277	2,984	1	0	0	0
Marshall Islands	2,026	2,774	269,566	40,655	6,630	69	72	854	0
Individuals	144	56	382	140	38	3	72	27	0
Corporations	1,684	2,231	266,394	40,314	6,024	66	0	827	0
Withholding rate pools (general)	d	0	d	d	0	d	0	0	0
Mauritius	2,321	2,744	102,968	51,775	7,964	56	87	1,344	0
Individuals	1,354	302	3,107	1,419	344	41	87	10	0
Corporations	706	1,785	55,336	31,244	4,162	2	0	1,333	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Mexico	345,440	400,610	8,954,369	2,418,221	2,255,582	1,346,100	296,656	114,434	0
Individuals	298,541	149,009	1,063,580	317,795	187,800	26,791	296,656	42,976	0
Corporations	8,477	184,385	5,723,278	947,236	1,868,224	1,247,110	0	35,608	0
Withholding rate pools (general)	6	2	24	d	23	d	0	0	0
Monaco	2,151	35,433	434,036	155,860	121,416	6,586	609	592	0
Individuals	1,550	5,370	32,189	10,070	6,502	3,778	609	422	0
Corporations	196	2,735	42,927	6,456	31,759	2,647	0	155	0
Withholding rate pools (general)	243	24,758	343,645	138,415	81,038	16	0	0	0
Morocco	4,044	795	102,014	94,627	916	1,786	170	620	0
Individuals	3,812	719	7,544	911	825	1,573	170	255	0
Corporations	60	10	487	45	4	71	0	353	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Netherlands	105,577	246,990	30,611,509	10,034,545	12,824,985	2,395,833	22,232	164,725	2,071
Individuals	76,589	20,605	154,463	12,826	42,112	14,728	22,232	12,784	0
Corporations	11,228	142,842	18,124,382	6,683,197	5,348,126	2,105,774	0	116,331	19
Withholding rate pools (general)	147	43,203	405,616	105,439	233,029	33,047	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued
[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
New Zealand	40,406	40,571	892,784	287,979	388,537	89,303	1,715	27,871	0
Individuals	28,354	6,030	51,133	2,777	13,478	9,749	1,715	2,408	0
Corporations	3,152	9,491	181,315	49,528	37,759	55,328	0	22,604	0
Withholding rate pools (general)	70	88	5,797	5,098	520	104	0	0	0
Nigeria	11,283	4,979	238,028	18,353	2,130	28,436	443	1,133	0
Individuals	10,478	4,163	22,280	749	1,256	2,052	443	989	0
Corporations	198	470	6,844	5,825	662	117	0	70	0
Withholding rate pools (general)	d	0	d	d	0	0	0	0	0
Norway	30,532	73,407	10,897,949	3,668,993	6,391,313	106,565	21,860	81,564	936
Individuals	26,081	12,129	75,009	750	8,889	15,528	21,860	12,924	0
Corporations	2,079	36,241	997,025	481,561	195,986	80,178	0	66,293	0
Withholding rate pools (general)	24	19,710	265,988	134,463	130,094	55	0	0	0
Oman	1,901	6,896	385,149	154,666	90,696	5,903	0	734	0
Individuals	1,499	286	2,305	1,129	928	81	0	9	0
Corporations	80	4,264	38,662	10,532	12,902	0	0	694	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Panama	37,776	57,204	894,116	622,185	170,545	22,084	3,073	3,069	0
Individuals	8,342	3,869	26,593	10,681	5,462	392	3,073	547	0
Corporations	27,864	48,498	708,219	471,906	150,377	21,314	0	945	0
Withholding rate pools (general)	96	1,793	26,631	20,815	5,471	0	0	0	0
Peru	16,098	75,177	855,170	535,776	240,789	5,892	2,837	2,193	0
Individuals	12,725	3,791	35,771	17,384	4,684	1,181	2,837	1,017	0
Corporations	1,408	49,721	287,063	93,170	161,335	3,725	0	615	0
Withholding rate pools (general)	d	d	d	d	d	0	0	0	0
Philippines	39,054	40,022	1,180,289	691,698	50,345	45,835	35,980	13,030	0
Individuals	34,832	18,850	92,246	7,983	9,581	3,238	35,980	3,906	0
Corporations	525	6,751	257,274	143,495	10,323	15,204	0	7,915	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Poland	54,784	37,879	995,287	718,221	30,840	106,079	81,786	16,937	0
Individuals	49,763	25,974	126,475	4,978	8,599	11,425	81,786	5,639	0
Corporations	1,075	9,557	130,976	13,890	20,473	67,663	0	9,168	0
Withholding rate pools (general)	7	16	543	436	101	d	0	0	0
Portugal	17,978	16,557	301,663	102,782	73,165	27,089	18,336	10,720	0
Individuals	15,393	8,411	59,013	10,571	9,962	4,194	18,336	4,880	0
Corporations	629	3,728	133,034	66,803	19,843	14,841	0	4,799	0
Withholding rate pools (general)	54	2,329	19,900	4,673	15,137	16	0	0	0
Puerto Rico	12,595	20,111	1,168,508	919,985	108,897	22,792	356	785	0
Individuals	2,657	2,876	18,593	90	195	2,050	356	46	0
Corporations	7,520	12,818	812,674	643,982	71,376	11,592	0	521	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Qatar	3,008	8,745	633,186	170,993	419,025	3,200	16	74	0
Individuals	2,636	754	5,381	1,941	1,822	605	16	19	0
Corporations	160	7,838	71,024	19,651	25,732	182	0	10	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Romania	14,342	4,079	182,607	142,434	4,306	17,670	689	4,947	0
Individuals	12,171	1,825	18,481	5,274	2,209	2,935	689	1,895	0
Corporations	500	1,362	22,239	8,113	1,718	7,364	0	2,385	0
Withholding rate pools (general)	4	3	162	d	d	d	0	0	0
Russia	208,516	11,339	589,941	301,829	45,754	88,247	60	26,754	0
Individuals	203,794	7,234	163,242	53,505	33,290	30,570	60	11,312	0
Corporations	1,038	1,415	199,916	52,567	8,002	54,115	0	12,556	0
Withholding rate pools (general)	28	206	5,875	4,492	1,369	13	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued

[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Saudi Arabia	16,683	34,280	4,026,784	1,180,890	1,361,106	12,425	20	427	0
Individuals	14,443	5,073	48,510	25,896	10,562	3,516	20	332	0
Corporations	595	28,118	812,456	163,694	29,119	157	0	0	0
Withholding rate pools (general)	5	1	4	d	d	0	0	0	0
Senegal	1,211	371	166,948	38,137	14,423	913	189	81	0
Individuals	1,035	317	2,685	242	23	834	189	78	0
Corporations	42	10	114,393	2,703	d	16	0	0	0
Withholding rate pools (general)	d	d	d	0	d	d	0	0	0
Singapore	155,186	324,669	13,539,476	5,977,568	3,843,169	263,486	1,126	25,150	0
Individuals	137,594	48,443	255,123	74,252	142,483	5,267	1,126	4,365	0
Corporations	5,263	111,927	2,769,307	1,211,876	270,996	56,968	0	7,697	0
Withholding rate pools (general)	696	145,535	1,044,687	544,578	480,760	213	0	0	0
South Africa	45,641	39,428	589,160	114,792	295,979	18,751	1,728	4,748	0
Individuals	36,220	8,848	66,626	4,281	31,566	5,252	1,728	2,060	0
Corporations	5,459	18,418	317,197	47,091	186,584	10,745	0	1,895	0
Withholding rate pools (general)	14	56	329	22	302	6	0	0	0
Spain	109,520	213,987	6,508,637	2,221,350	2,626,638	1,024,029	32,718	40,776	46,538
Individuals	91,151	21,990	190,624	29,919	42,320	29,776	32,718	14,031	0
Corporations	8,407	156,079	4,892,998	1,112,040	2,318,261	978,610	0	23,568	24,731
Withholding rate pools (general)	354	25,054	381,200	220,320	156,773	29	0	0	0
St Kitts & Nevis	9,484	9,811	161,110	119,304	33,191	2,591	159	19	0
Individuals	367	238	4,643	3,349	452	115	159	19	0
Corporations	8,956	9,122	125,164	86,179	32,044	1,791	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Sweden	39,782	279,805	9,368,124	3,025,604	3,179,627	2,449,105	20,483	29,636	0
Individuals	29,921	12,171	86,866	3,256	12,617	18,364	20,483	5,108	0
Corporations	4,496	108,626	5,949,410	1,493,346	1,824,747	2,190,863	0	21,705	0
Withholding rate pools (general)	232	151,221	1,262,795	167,152	1,065,869	23	0	0	0
Switzerland	97,607	959,089	53,847,976	25,674,625	13,444,714	6,074,072	24,830	191,391	368,794
Individuals	63,332	40,349	561,067	50,419	216,502	186,136	24,830	11,107	0
Corporations	15,112	244,678	29,648,619	14,254,522	5,100,461	5,501,417	0	156,748	325,830
Withholding rate pools (general)	3,824	652,210	9,309,267	5,163,341	3,897,740	6,745	0	0	0
Taiwan	201,121	292,762	23,245,310	18,975,011	1,441,912	1,438,583	1,311	7,161	857
Individuals	188,870	40,052	279,033	107,780	103,389	7,034	1,311	2,824	0
Corporations	5,614	225,766	9,675,686	8,421,341	678,481	38,425	0	3,089	857
Withholding rate pools (general)	70	5,354	109,274	90,107	17,771	2	0	0	0
Thailand	34,994	25,556	2,061,405	1,734,489	247,885	23,684	8,058	3,128	0
Individuals	32,251	6,953	58,520	9,542	13,402	10,098	8,058	2,194	0
Corporations	609	16,786	165,946	109,643	37,374	11,233	0	866	0
Withholding rate pools (general)	12	13	129	43	86	0	0	0	0
Trinidad and Tobago	9,804	9,224	319,449	243,653	59,403	2,457	1,971	723	0
Individuals	7,825	2,642	19,603	6,219	3,477	1,937	1,971	668	0
Corporations	1,170	6,367	127,733	101,437	21,418	225	0	23	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0
Turkey	23,120	21,646	236,036	99,201	54,324	32,902	1,612	2,629	0
Individuals	20,515	6,682	53,540	5,585	10,032	8,302	1,612	1,748	0
Corporations	716	13,197	121,076	44,254	39,076	20,443	0	415	0
Withholding rate pools (general)	7	0	10	8	d	d	0	0	0

Footnotes at end of table.

Table 2. Foreign Recipients of U.S. Income Under Chapter 3 Withholding, Forms 1042-S: Number, U.S. Tax Withheld, and U.S.-Source Income, by Principal Types of Income, Selected Recipient Types, and Selected Countries of Recipients, Calendar Year 2019—Continued
[Money amounts are in thousands of dollars]

Recipient types and selected country and selected recipient type	Number of Forms 1042-S	U.S. tax withheld	Total U.S.-source income	Principal types of U.S.-source income					
				Interest	Dividends	Rents and royalties	Social Security and Railroad Retirement payments	Personal services income	Notional principal contract income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
United Arab Emirates	28,256	23,801	3,216,412	874,321	1,584,401	24,897	185	3,768	0
Individuals	25,142	8,782	52,437	16,094	19,310	2,417	185	1,807	0
Corporations	1,682	11,923	302,671	96,190	77,564	2,494	0	1,302	0
Withholding rate pools (general)	26	674	9,282	6,994	1,790	151	0	0	0
United Kingdom	669,796	1,452,384	173,497,716	51,116,977	57,374,660	6,976,156	147,018	1,635,094	19,988,034
Individuals	502,870	169,976	1,822,005	163,336	675,159	278,568	147,018	108,398	0
Corporations	50,196	515,631	138,132,964	35,457,368	47,395,253	5,634,892	0	1,367,892	19,548,881
Withholding rate pools (general)	1,530	402,250	8,373,572	4,904,565	2,616,631	14,911	0	13,852	0
Uruguay	19,912	10,395	289,852	240,274	26,151	6,601	1,209	4,956	0
Individuals	15,690	3,514	61,918	47,311	7,786	587	1,209	670	0
Corporations	3,265	5,514	101,594	75,420	12,701	4,391	0	4,162	0
Withholding rate pools (general)	172	942	25,356	21,374	3,187	0	0	0	0
U.S. Virgin Islands	3,287	9,532	144,413	51,834	30,345	36	0	122	0
Individuals	715	1,572	12,413	31	8	9	0	56	0
Corporations	2,315	6,105	110,128	40,531	20,064	27	0	0	0
Withholding rate pools (general)	0	0	0	0	0	0	0	0	0
Venezuela	99,343	13,322	326,346	244,214	41,165	9,470	838	7,962	0
Individuals	92,818	11,115	247,981	179,061	36,998	7,202	838	5,874	0
Corporations	3,093	953	66,314	60,673	3,396	480	0	78	0
Withholding rate pools (general)	9	3	105	85	18	0	0	0	0
Vietnam	11,724	3,680	460,234	435,154	489	7,370	77	1,122	0
Individuals	10,501	3,218	18,002	1,672	436	3,811	77	505	0
Corporations	138	135	2,406	313	41	324	0	148	0
Withholding rate pools (general)	d	d	d	0	d	0	0	0	0

d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals
[1] The majority of income for this recipient category is reported in a separate income code, specifically for artist and athlete income (which is not shown separately in this table).
NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled "Foreign Person's U.S.-Source Income Subject to Withholding." All countries with total U.S.-source income over $100 million for Calendar Year 2019 were selected for this table. Chapter 3 withholding describes the withholding regime that requires withholding on a payment of U.S.-source income. Payments to foreign persons, including nonresident alien individuals, foreign entities, and governments, may be subject to Chapter 3 withholding.
SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2021.

Table 3. Recipients of U.S. Income Under Chapter 4 Withholding, Forms 1042S: Number, Total U.S.-Source Income, and U.S. Tax Withheld, by Selected Income Types, Calendar Year 2019

[Money amounts are in thousands of dollars]

Income types	Number of Forms 1042-S [1]	U.S.-source income			U.S. tax withheld
		Total	Exempt from withholding	Subject to withholding	
	(1)	(2)	(3)	(4)	(5)
Total	**200,266**	**6,203,339**	**4,260,750**	**1,942,589**	**560,897**
Dividends	93,244	1,379,497	228,974	1,150,524	337,978
Interest	96,991	3,420,376	2,956,450	463,926	130,150
Return on capital	1,762	91,400	81,613	9,788	2,926
Rents and royalties	1,042	171,102	155,225	15,877	2,420
Dividend equivalents under IRC Section 871(m)	608	75,430	16	75,415	22,498
Personal services income	430	19,778	17,406	2,372	696
Pensions, annuities, alimony, and/or insurance premiums	170	217,772	216,657	1,115	309
Scholarship or fellowship grants	96	3,987	3,823	163	48
All other income types	5,923	823,996	600,587	223,410	63,872

[1] Data in this table are based on returns filed pursuant to Chapter 4 of the Internal Revenue Code (IRC). Returns that were filed pursuant to Chapter 3 of the Code are not included in this table; however, they are included in Tables 1 and 2. Chapter 4 withholding was introduced as part of the Foreign Account Tax Compliance Act (FATCA) and requires U.S. withholding agents to withhold tax on certain payments to foreign financial institutions (FFIs) that do not agree to report information to the IRS regarding their U.S. account, and on payments to certain nonfinancial foreign entities (NFFEs) that do not provide information on their substantial U.S. owners to withholding agents.

NOTES: Detail may not add to totals because of rounding. Form 1042-S is entitled "Foreign Person's U.S.-Source Income Subject to Withholding."

SOURCE: IRS, Statistics of Income Division, Foreign Recipients of U.S. Income, October 2021.

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