by Scott Hollenbeck and Maureen Keenan Kahr

or 2016, the total amount of foreign-earned income reported by U.S. taxpayers decreased in real terms by 11.2 percent from 2011 levels of \$57.9 billion, to just over \$51.4 billion. In contrast, foreign-source gross income reported by U.S. taxpayers increased in real terms by 19.5 percent to \$216.7 billion for the year, while the total foreign tax credit claimed grew 14.5 percent to just under \$20.1 billion. Unless otherwise stated, the statistics reported in this article are based on data compiled from Form 2555, Foreign Earned Income, Form 2555-EZ, Foreign Earned Income Exclusion, Form 1116, Foreign Tax Credit, and Form 1040, U.S. Individual Income Tax Return. U.S. taxpayers file these forms with their individual income tax returns to report foreign-earned income and claim the foreign tax credit.

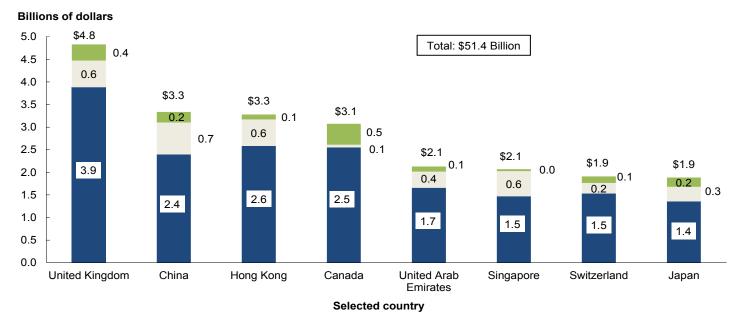
#### Foreign-Earned Income Highlights

For 2016, more than 480,000 U.S. taxpayers living abroad reported just more than \$51.4 billion in foreign-earned income, a

decrease of 11.2 percent in real terms from 2011 (the last time this study was done) (Figure A). U.S. taxpayers claimed \$29.6 billion as a foreign-earned income exclusion on their tax returns for the year. Between 2011 and 2016, the inflation-adjusted amount of the foreign-earned income exclusion decreased 2.3 percent, while the housing exclusion decreased 20.3 percent, falling from just under \$1.7 billion to a little over \$1.3 billion for 2016. Nearly 69 percent of all taxpayers reporting foreign-earned income had no U.S. income tax liability for 2016.

Asian-based U.S. taxpayers continued to report the largest amount of total foreign-earned income (\$22.9 billion) from any continent for 2016, even after a 13.8-percent decrease in real dollars from the \$26.6 billion reported for 2011. For 2016, these returns represent approximately 45 percent of all the foreign-earned income reported by U.S. taxpayers, which was roughly the same percentage for 2011 (46 percent) but higher than the 40 percent for 2006. Much of this negative growth is attributable

Figure A
Foreign-Earned Income by Selected Country, Tax Year 2016



■ Foreign-earned income reported on Form 2555EZ

Noncash income, allowances, reimbursements or expenses paid, and other income

Salaries and wages, business or professional, and partnership income (loss)

NOTE: Detail may not add to totals because of rounding. Data are from Form 2555, Foreign Earned Income, and Form 2555-EZ, Foreign Earned Income Exclusion, filed by U.S. taxpayers with Form 1040, U.S. Individual Income Tax Return.

SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

See Hollenbeck, Scott, and Maureen Keenan Kahr. "Individual Foreign-Earned Income and Foreign Tax Credit, 2006," Statistics of Income Bulletin, Spring 2009, Volume 28, Number 4.



to returns with tax homes of Afghanistan, Iraq, and Japan reporting a combined amount of just under \$3.2 billion in total foreign-earned income for 2016, after reporting nearly \$7.6 billion for 2011. Taxpayers based in China had a real decrease of 4.5 percent in total foreign-earned income reported. However, they were the second largest source of total foreign-earned income for 2016, at just over \$3.3 billion.

European-based U.S. taxpayers reported the second largest amount of foreign-earned income of just over \$13.4 billion, which was a real decrease of 12.3 percent from 2011. As in previous years, the United Kingdom continued to lead all countries from all continents with over \$4.8 billion in foreign-earned income, accounting for more than a third of all income from European-based returns. However, this was a 16.5-percent decrease from \$5.8 billion in 2011, contributing about half of the overall decrease from European-based returns.

Total foreign-earned income reported for North Americanbased taxpayers fell 21.7 percent in real terms for 2016. Canadian-based taxpayers contributed largely to this decline in reported income, reporting just under \$3.1 billion in foreignearned income for the year, a 25.0-percent decrease from 2011.

#### **Foreign Tax Credit Highlights**

From 2011 to 2016, inflation-adjusted foreign-source gross income reported on Form 1116, *Foreign Tax Credit*, grew 19.5 percent, and real foreign tax credits claimed rose 14.5 percent. U.S. taxpayers claimed a total of nearly \$20.1 billion in foreign tax credits from approximately 7.8 million returns for 2016; these credits were based on a reported \$216.7 billion in foreign-source gross income and \$27.0 billion in foreign taxes paid or accrued.

As with foreign-earned income by country, the United Kingdom continued to lead in terms of foreign-source gross income reported on Form 1116. For 2016, taxpayers reported \$16.7 billion in foreign-source gross income from the United Kingdom, a growth of 12.7 percent from the inflation-adjusted \$14.8 billion reported for 2011. By region, taxpayers reported the most foreign-source gross income from European countries (\$37.8 billion), followed closely by Asian countries (\$33.1 billion) for 2016. However, Asian countries reported the largest growth. From 2011 to 2016, foreign-source gross income reported for these countries increased 62.2 percent, led by a more than threefold growth from India.

#### **Overview of Foreign-Earned Income Provisions**

In an effort to increase U.S. participation in foreign trade, a Federal income tax law was passed in 1926, which allowed for an exclusion of foreign-earned income from taxes. Under the 2016 version of the law, section 911 of the Internal Revenue Code, qualified U.S. citizens or resident aliens living and working abroad could elect to exclude a certain amount of foreign-earned income and an excess foreign housing cost. The election was made separately for each of the exclusions. To qualify, an individual must have had a foreign tax home and satisfied either the bona fide residence or physical presence test. Only

U.S. citizens could use the bona fide residence test. The bona fide residence test was generally satisfied if the individual had established and maintained a residence in a foreign country for an uninterrupted period that included an entire taxable year. An individual would not be considered a resident if a statement was submitted to the taxing authorities of the foreign country indicating nonresidency and the foreign country did not subject the individual to foreign income taxation. Under the physical presence test, an individual had to be present in a foreign country for at least 330 full days during any period of 12 consecutive months.

In general, earned income was compensation received for personal services. Thus, wages, salaries, and professional fees qualified as earned income for purposes of the exclusion. Taxpayers engaged in a trade or business that used both capital and services to produce income, could treat any reasonable amount that did not exceed 30 percent of the taxpayer's share of the net profits of the trade or business as earned income. Earned income also included employer-provided allowances or reimbursements, such as cost-of-living allowances, overseas compensation differentials, quarters, education allowances, and the full rental value of property or facilities provided by the employer. To qualify for the exclusions, the earned income had to be foreign-earned income. In general, it would be foreign-earned income if the taxpayer performed personal services in a foreign country. The actual location of the employer and employee at the time the taxpaver received the compensation did not affect this determination. Not included in foreign-earned income were pensions, annuities, compensation by the U.S. Government, and income excluded by an employer to compensate for meals and lodging provided for the employer's convenience.

For 2016, the maximum amount of foreign-earned income a taxpayer could exclude was \$101,300, prorated on a daily basis for the qualifying period. (For 2011, this amount was \$92,900.) If a taxpayer elected both the foreign-earned income and housing exclusions, the foreign housing exclusion was calculated first. The foreign-earned income exclusion was then limited to the excess of foreign-earned income over the housing exclusion.

Qualified housing expenses were reasonable housing costs paid or incurred during the tax year. In general, these expenses included utilities, insurance, and rent. The excess-housing cost was equal to the individual's qualified housing expenses for the tax year over a base-level amount (\$16,208 for 2016) prorated on a daily basis. To the extent these were employer-provided amounts, the excess housing cost was allowed as a foreign housing exclusion. Housing costs related to self-employment were allowed as a foreign housing deduction in computing adjusted gross income. The foreign housing deduction was limited to the excess of foreign-earned income over the sum of foreign-earned income and housing exclusions. Any excess housing amount that was not deductible could be carried over to the following tax year.

In addition to the exclusions (foreign-earned income and housing) and the housing deduction, individuals could also claim a foreign tax credit (discussed in more detail in the Foreign Tax Credit Overview section). This credit was for foreign-income taxes paid or accrued on two types of income: (1) foreign-earned income for which the income exclusion was not claimed, and (2) foreign-source income that did not qualify for the exclusions or deduction.

U.S. taxpayers file Form 2555, Foreign Earned Income, with Form 1040, U.S. Individual Income Tax Return, to claim the exclusions and the housing deduction. For 2016, of the 150.3 million individual income tax returns filed with the Internal Revenue Service, an estimated 482,640 had a Form 2555 attached (or Form 2555-EZ), slightly more than 0.3 percent of the total. Tables 1 and 2 present statistics for individual income tax returns with the foreign-earned income exclusion, foreign housing exclusion, and foreign housing deduction.

#### **Total Foreign-Earned Income**

For 2016, U.S. taxpayers reported \$51.4 billion in foreign-earned income, a real decrease of 11.2 percent from the 2011 inflation-adjusted amount of \$57.9 billion. This represents a real annual loss rate of (2.3) percent from 2011.<sup>3,4</sup> This can be attributed to a decrease in the average amount of foreign-earned income reported per return, which outweighed an overall increase in the number of returns filed with the exclusion. From 2011 to 2016, taxpayers filed approximately 33,400 more returns with the exclusion (up 7.4 percent). During this same period, the average amount of total foreign-earned income per return decreased approximately 17.3 percent in real terms, from an average of \$128,828 for 2011 to \$106,550 for 2016. This decrease followed a 1.4-percent decrease from 2006 to 2011.

Of the more than 480,000 returns filed with a Form 2555 attached, returns with a tax home of Canada (10.3 percent), the United Kingdom (7.4 percent), China (5.0 percent), Japan (4.4 percent), and Germany (4.4 percent) represented about a third of the total number of returns filed for the year. In 2016, roughly 7,500 taxpayers reported a tax home of Afghanistan and 3,300 with a tax home of Iraq, a 67.5-percent and 76.2-percent decrease, respectively, from the 2011 study. The number of returns reporting China as a tax home continued to grow steadily. rising 143.6 percent between 2001 and 2006, another 79.6 percent between 2006 and 2011, and 8.2 percent between 2011 and 2016 (to over 24,000 returns).<sup>5</sup> The large drop in returns filed in Afghanistan and Iraq (more than 26,000 returns combined), surpassed several of the increases of returns filed in other tax homes from Asia, leading to an overall decrease of 7.4 percent for Asian-based returns (Figure B). For 2016, the number of Asian-based returns with foreign-earned income (just over

180,000) was 42.2 percent higher than the number of returns for Europe (almost 127,000). These data show over 15 years of strong growth in Asian-based U.S. taxpayers since 2001, when Europe represented the region with the largest number of returns reported.

Along with the number of returns, U.S. taxpayers in Asian-based countries reported the highest total earned income for 2016 (just over \$22.9 billion). This amount represented a 13.8-percent decrease, in real dollars, from 2011. Contributing to the overall decrease were total foreign-earned income decreases in Iraq (76.1 percent), Afghanistan (71.2 percent), and Japan (32.0 percent). These three countries accounted for an overall decrease of nearly \$4.4 billion of total foreign-earned income reported from Asian-based returns.

While the number of returns from North America increased by 5.0 percent from 2011 to 2016, the total foreign-earned income reported decreased 21.7 percent, in real dollars, to \$3.7 billion. This overall drop was driven by a 25.0-percent decrease in total foreign-earned income reported by taxpayers in Canada from \$4.1 billion to \$3.1 billion, in real dollars. This decrease moved Canada from the second largest source of foreign-earned income to the fourth largest in 2016. Similarly, the number of returns from Europe increased by 18.2 percent from 2011 to 2016; however, total foreign-earned income decreased 12.3 percent, in real dollars, to \$13.4 billion. Decreases reported by taxpayers in the United Kingdom (down 16.5 percent) and Germany (down 12.6 percent) contributed to this decline. Overall decreases in foreign-earned income were also reported on returns from Latin/ South American-based countries (down 19.7 percent), Oceania (down 5.7 percent), Africa (down 5.1 percent) and the Caribbean (down 4.8 percent) during this same period.

As in previous years, United Kingdom-based individuals reported the largest amount of foreign-earned income (just over \$4.8 billion) for 2016. However, the decline for these taxpayers (down 16.5 percent), continued the trend of reducing the overall share of foreign-earned income in the United Kingdom, from 17.0 percent for 2006, to 10.0 percent for 2011, and then to 9.4 percent for 2016. The difference in total foreign-earned income between the United Kingdom (the largest source) and China (the second largest source) was \$1.5 billion. For 2011, the gap in total foreign-earned income reported on returns from the two largest countries (the United Kingdom and Canada) was approximately \$1.7 billion.

China-based U.S. taxpayers became the second largest source of total foreign-earned income in 2016, despite showing a 4.5-percent decrease to \$3.3 billion. Taxpayers from Hong

Year CPI-U 2016 240.007 2011 224.939

<sup>&</sup>lt;sup>2</sup> Data for all taxpayers who filed a Form 1040 for 2016 cited in this article are from the Statistics of Income, Individual Income Tax Returns Complete Report 2016, Publication 1304.

<sup>3</sup> Data in this article are compared to 2011 and 2006 data because these are the last years for which comparable statistics are available.

<sup>&</sup>lt;sup>4</sup> For comparability, 2011 amounts presented in this article were adjusted for U.S. inflation to 2016 constant dollars. However, these adjustments do not necessarily adjust for country-specific inflation in countries for which income was reported. The inflation-adjusted constant-dollar amounts are based on the Consumer Price Index (CPI-U) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, *Monthly Labor Review*. The consumer price index represents annual averages of monthly indices and approximates buying patterns of typical urban consumers.

See Hollenbeck, Scott, and Maureen Keenan Kahr. "Individual Foreign-Earned Income and Foreign Tax Credit, 2011," Statistics of Income Bulletin, Spring 2014, Volume 33, Number 4.

Figure B Foreign-Earned Income, Exclusion, and Housing Deduction, by Selected Country or Region, Tax Years 2011 and 2016

[Money amounts are in thousands of dollars]

| Selected country or region | Nu                 | umber of returns | [1]               | Total      | foreign-earned in | ncome             |            | Foreign-earned<br>income exclusion<br>before deduction | n                 |
|----------------------------|--------------------|------------------|-------------------|------------|-------------------|-------------------|------------|--|-------------------|
|                            | 2011               | 2016             | Percentage change | 2011 [2]   | 2016              | Percentage change | 2011 [2]   | 2016   | Percentage change |
|                            | (1)                | (2)              | (3)               | (4)        | (5)               | (6)               | (7)        | (8)  | (9)               |
| All geographic areas       | 449,277            | 482,640          | 7.4               | 57,879,477 | 51,425,521        | -11.2             | 30,243,611 | 29,557,323   | -2.3              |
| North America              | 52,883             | 55,545           | 5.0               | 4,754,518  | 3,721,948         | -21.7             | 3,135,191  | 2,669,720  | -14.8             |
| Canada [3]                 | 45,949             | 49,518           | 7.8               | 4,099,192  | 3,072,689         | -25.0             | 2,753,371  | 2,289,517  | -16.8             |
| Mexico                     | 6,934              | 6,027            | -13.1             | 655,325    | 649,259           | -0.9              | 381,820    | 380,203  | -0.4              |
| Asia                       | 194,703            | 180,257          | -7.4              | 26,580,385 | 22,907,737        | -13.8             | 13,583,730 | 12,028,753   | -11.4             |
| Afghanistan                | 22,951             | 7,454            | -67.5             | 3,159,873  | 908,969           | -71.2             | 1,866,751  | 602,705  | -67.7             |
| China                      | 22,328             | 24,155           | 8.2               | 3,486,040  | 3,330,668         | -4.5              | 1,541,738  | 1,538,087  | -0.2              |
| Hong Kong                  | 13,181             | 13,625           | 3.4               | 3,100,556  | 3,235,667         | 4.4               | 1,040,853  | 1,132,709  | 8.8               |
| Iraq                       | 14,021             | 3,332            | -76.2             | 1,656,007  | 395,274           | -76.1             | 1,098,162  | 274,885  | -75.0             |
| Israel                     | 9,872              | 15,204           | 54.0              | 689,183    | 987,833           | 43.3              | 520,778    | 788,388  | 51.4              |
| Japan                      | 23,054             | 21,460           | -6.9              | 2,767,081  | 1,882,953         | -32.0             | 1,330,138  | 1,106,441  | -16.8             |
| Saudi Arabia               | 7,968              | 9,708            | 21.8              | 1,211,517  | 1,635,633         | 35.0              | 638,653    | 819,735  | 28.4              |
| Singapore                  | 7,749              | 8,390            | 8.3               | 2,042,566  | 2,066,358         | 1.2               | 676,660    | 732,228  | 8.2               |
| South Korea                | 13,659             | 16,042           | 17.4              | 1,198,496  | 1,367,798         | 14.1              | 700,345    | 846,833  | 20.9              |
| United Arab Emirates       | 12,153             | 13,898           | 14.4              | 1,731,870  | 2,122,551         | 22.6              | 966,422    | 1,169,369  | 21.0              |
| Other Asia                 | 47,769             | 46,990           | -1.6              | 5,537,197  | 4,974,032         | -10.2             | 3,203,230  | 3,017,373  | -5.8              |
| Europe                     | 107,220            | 126,775          | 18.2              | 15,330,531 | 13,443,913        | -12.3             | 7,115,439  | 7,592,921  | 6.7               |
| France                     | 11,111             | 12,800           | 15.2              | 1,290,875  | 1,179,577         | -8.6              | 665,409    | 730,887  | 9.8               |
| Germany                    | 19,173             | 21,046           | 9.8               | 1,967,410  | 1,720,380         | -12.6             | 1,175,810  | 1,207,540  | 2.7               |
| Switzerland                | 10,548             | 13,235           | 25.5              | 1,955,292  | 1,907,327         | -2.5              | 890,610    | 1,031,511  | 15.8              |
| United Kingdom             | 31,599             | 35,752           | 13.1              | 5,784,884  | 4,827,930         | -16.5             | 2,075,076  | 2,248,703  | 8.4               |
| Other Europe               | 34,790             | 43,943           | 26.3              | 4,332,071  | 3,808,699         | -12.1             | 2,308,534  | 2,374,279  | -2.6              |
| Latin/South America        | 14,732             | 14,557           | -1.2              | 1,875,225  | 1,506,601         | -19.7             | 939,143    | 863,663  | -8.0              |
| Caribbean                  | 8,437              | 7,249            | -14.1             | 960,357    | 914,613           | -4.8              | 575,509    | 505,231  | -12.2             |
| Africa                     | 14,530             | 16,124           | 11.0              | 1,694,675  | 1,608,955         | -5.1              | 895,690    | 1,003,901  | 12.1              |
| Oceania                    | 14,449             | 17,489           | 21.0              | 1,859,726  | 1,754,068         | -5.7              | 1,018,858  | 1,120,308  | 10.0              |
| Other [5]                  | 42,323             | 64,644           | 52.7              | 4,824,059  | 5,567,686         | 15.4              | 2,980,051  | 3,772,827  | 26.6              |
|                            | cted country or i  | ,                | <u> </u>          | <i>'</i>   | Housing exclusio  | n                 | <i>'</i>   | Housing deduction                                      | n                 |
| Sele                       | Cica Coullily Of I | cylon            |                   |            |                   | Danasatana        |            |  | Danasa            |

|                            | ŀ         | Housing exclusio | n                 | Housing deduction |        |                   |  |
|----------------------------|-----------|------------------|-------------------|-------------------|--------|-------------------|--|
| Selected country or region | 2011 [2]  | 2016             | Percentage change | 2011 [2]          | 2016   | Percentage change |  |
|                            | (10)      | (11)             | (12)              | (13)              | (14)   | (15)              |  |
| All geographic areas       | 1,684,019 | 1,341,816        | -20.3             | 105,644           | 78,285 | -25.9             |  |
| North America              | 24,345    | 17,158           | -29.5             | 2,080             | 1,119  | -46.2             |  |
| Canada [3]                 | 15,755    | 7,306            | -53.6             | 1,909             | * 225  | -88.2             |  |
| Mexico                     | 8,588     | 9,851            | 14.7              | * 171             | * 894  | 423.7             |  |
| Asia                       | 985,282   | 869,108          | -11.8             | 50,351            | 43,691 | -13.2             |  |
| Afghanistan                | 3,436     | 824              | -76.0             | * 271             | * 202  | -25.5             |  |
| China                      | 146,183   | 114,045          | -22.0             | 5,986             | 4,395  | -26.6             |  |
| Hong Kong                  | 247,645   | 249,618          | 0.8               | 12,459            | 14,201 | 14.0              |  |
| Iraq                       | 2,942     | * 352            | -88.0             | * 160             | 0      | [4]               |  |
| Israel                     | 2,684     | 2,538            | -5.4              | * 156             | * 851  | 446.3             |  |
| Japan                      | 151,138   | 54,031           | -64.3             | 14,899            | 4,414  | -70.4             |  |
| Saudi Arabia               | 9,704     | 25,692           | 164.7             | 1,046             | * 993  | -5.0              |  |
| Singapore                  | 163,581   | 144,237          | -11.8             | 3,332             | 3,812  | 14.4              |  |
| South Korea                | 36,166    | 29,065           | -19.6             | 1,882             | 961    | -48.9             |  |
| United Arab Emirates       | 95,260    | 134,740          | 41.4              | 6,122             | 8,228  | 34.4              |  |
| Other Asia                 | 126,543   | 113,966          | -9.9              | 4,036             | 5,636  | 39.6              |  |
| Europe                     | 477,234   | 284,029          | -40.5             | 38,283            | 18,985 | -50.4             |  |
| France                     | 57,035    | 24,214           | -57.5             | 4,512             | 1,625  | -64.0             |  |
| Germany                    | 54,098    | 22,932           | -57.6             | 6,086             | 1,360  | -77.7             |  |
| Switzerland                | 73,634    | 67,559           | -8.3              | 3,462             | 1,788  | -48.4             |  |
| United Kingdom             | 163,480   | 100,584          | -38.5             | 18,235            | 11,135 | -38.9             |  |
| Other Europe               | 128,991   | 68,741           | -46.7             | 5,987             | 3,078  | -48.6             |  |
| Latin/South America        | 33,980    | 22,666           | -33.3             | 2,750             | 1,863  | -32.2             |  |
| Caribbean                  | 40,433    | 37,055           | -8.4              | * 733             | 2,326  | 217.3             |  |
| Africa                     | 35,905    | 22,356           | -37.7             | 2,498             | 1,151  | -53.9             |  |
| Oceania                    | 36,752    | 24,702           | -32.8             | 593               | 488    | -17.7             |  |
| Other [5]                  | 50,090    | 64,742           | 29.3              | 8,358             | 8,661  | 3.6               |  |

<sup>\*</sup> Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>[1]</sup> Data are from Forms 2555, Foreign Earned Income, filed by U.S. taxpayers with Form 1040, U.S. Individual Income Tax Return.

<sup>[2]</sup> For comparability, 2011 amounts have been adjusted for inflation to 2016 constant dollars. The inflation-adjusted constant dollars are based on the Consumer Price Index (CPI-U) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, Monthly Labor Review. The consumer price index represents annual averages of monthly indices and approximates buying patterns of typical urban consumers. Year CPI-U

<sup>2016 240.007</sup> 2011 224.939

<sup>[3]</sup> Includes returns filed with a taxpayers based in Greenland.

<sup>[4]</sup> Percentage not computed.

<sup>[5]</sup> Includes returns with no country stated and U.S. Possessions.

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

SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

Kong moved up to become the third largest source of total foreign-earned income in 2016, with a 4.4-percent increase to \$3.2 billion. Other Asia-based returns, including United Arab Emirates (up 22.6 percent to \$2.1 billion), Saudi Arabia (up 35.0 percent to \$1.6 billion), South Korea (up 14.1 percent to \$1.4 billion), and Israel (up 43.3 percent to \$1.0 billion) showed significant increases during this same period.

Individuals with tax homes in the United Kingdom (9.4 percent), China (6.5 percent), Hong Kong (6.3 percent), Canada (6.0 percent), United Arab Emirates (4.1 percent), Singapore (4.0 percent), Switzerland (3.7 percent), and Japan (3.7 percent) accounted for approximately 43.6 percent of the total foreignearned income for 2016 (Figure A). Of these selected countries, six also had the largest amounts of income for the 2011 study, with the United Arab Emirates and Switzerland replacing Afghanistan and Germany in the latest study. In rank order, China jumped to the second highest amount of foreign-earned income, while Hong Kong moved from the fifth to the third spot. The United Arab Emirates moved up to the fifth spot after not being among the top eight in 2011. While foreign-earned income increased in the United Arab Emirates (up 22.6 percent), Hong Kong (up 4.4 percent) and Singapore (up 1.2 percent), it decreased in the other five countries with the largest foreignearned income.

#### **Composition of Foreign-Earned Income**

For 2016, of the \$51.4 billion in foreign-earned income (cited above), taxpayers reported just under \$46.8 billion on Form 2555. Taxpayers reported the remaining \$4.6 billion using Form 2555-EZ. Data related to the composition of foreign-earned income are not available on Form 2555-EZ; therefore,

the breakdown in the ensuing discussion includes only those amounts reported on Form 2555.

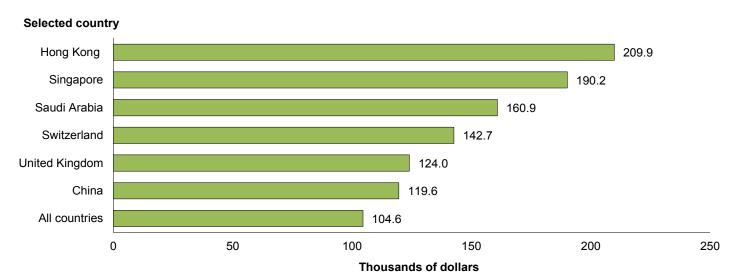
Salaries and wages comprised 79.8 percent of the total foreign-earned income reported for 2016 (Table 1). Of the remaining 20.2 percent, allowances, reimbursements, or expenses paid by employers made up 11.2 percent; while business or professional, partnership, noncash and other income accounted for 9.1 percent. The average foreign-source salary for a taxpayer filing Form 2555 (with wages) was approximately \$104,576. This average, however, varied greatly among the various countries. Of the top six countries (those with the highest average wages with at least 5,000 Forms 2555 attached to individual tax returns), returns from Hong Kong-based taxpayers reported the highest average salary (\$209,888) for 2016, followed by Singapore (\$190,163). Taxpayers from China reported the lowest average salary (\$119,627) amoung the top six countries (Figure C).

The average salary reported for Hong Kong returns increased by just over \$15,000 (in real dollars) from 2011. Also, for 2016, the difference in average salary between Hong Kong and Singapore was approximately \$19,725. In comparison, for the 2011 study, Hong Kong and Singapore were also the top two countries, respectively, based on average salary. At that time, the average salary reported by taxpayers based in the Hong Kong was approximately \$5,400 higher than the average salary reported by taxpayers based in Singapore.

# Foreign-Earned Income Exclusion, Housing Exclusion, and Housing Deduction

From 2011 to 2016, the total amount reported for the foreignearned income exclusion fell 2.3 percent (in real terms) to \$29.6

Figure C
Average Foreign Salaries and Wages Earned by U.S. Taxpayers Reporting Salaries and Wages on Form 2555, by Selected Country,
Tax Year 2016



NOTE: U.S. taxpayers filed Form 2555, Foreign Earned Income, with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

billion. This decrease occurred while the amount of foreignearned income that a taxpayer could exclude increased from \$92,900 to \$101,300. The amount reported for the housing exclusion was approximately 20.3 percent lower, from an inflation-adjusted \$1.7 billion in 2011 to \$1.3 billion in 2016. The housing deduction also decreased in real terms (25.9 percent), to a total of \$78.3 million for 2016.

Decreases in both the housing exclusion and housing deduction can mostly be attributed to fewer taxpayers claiming these benefits. Starting in 2006, the IRS placed limits on the amount of housing expenses eligible for the exclusion or deduction. In general, for 2016, a limit of \$30,390 (up from \$27,870 in 2011) was placed on eligible housing expenses; however, taxpayers could take a higher expense amount if they resided in specific countries or cities listed by the IRS in the instructions for Form 2555, Foreign Earned Income.

For 2016, individuals with a tax home of Canada reported the highest amount of exclusions for foreign-earned income, followed by the United Kingdom and China. Taxpayers from Canada reported \$2.3 billion in foreign-earned income exclusions for the year, down 16.8 percent from the inflation-adjusted \$2.8 billion excluded in 2011. In comparison, United Kingdom-based taxpayers reported over \$2.2 billion, up 8.4 percent from 2011, despite the 16.5-percent decline in reported foreign-earned income cited above. Individuals based in China reported over \$1.5 billion in foreign-earned income exclusions, after reporting nearly the same inflation-adjusted amount for 2011. A 75.0-percent decrease in this exclusion in Iraq (to just under \$275 million), and a 67.7-percent decrease in Afghanistan (to just over \$600 million), contributed to much of the overall 11.4-percent decline in foreign-earned income exclusions from Asian-based taxpayers for 2016.

Of the \$1.3 billion housing exclusion reported for 2016 (cited above), individuals in Asia accounted for 64.8 percent of the total, up from 58.5 percent in 2006. The largest of these was reported by individuals with a tax home of Hong Kong (18.6 percent), Singapore (10.7 percent), United Arab Emirates (10.0 percent), or China (8.5 percent). These countries alone accounted for about 47.9 percent of the housing exclusion reported for the year. The overall decrease of the housing exclusion reversed the 5.8-percent increase reported in the 2011 study.

Taxpayers with foreign-earned income also used the housing deduction to increase their total statutory adjustments, thus decreasing their adjusted gross income. For 2016, just over 4,300 taxpayers claimed the housing deduction for a total of \$78.3 million. The average housing deduction was \$17,926 for the year.

Individual taxpayers claiming both the foreign-earned income and housing exclusions, along with the housing deduction, reported worldwide income of \$70.6 billion for 2016 (Table 1). After claiming the exclusions and deduction, these taxpayers reduced their worldwide income by \$30.6 billion, or just over 43 percent. Approximately 68.5 percent of all taxpayers who claimed the exclusions, deductions, and any foreign tax credits

to which they were entitled, had no U.S. income tax liability for 2016. This was up from 60.8 percent from 2011.

Starting in 2006, individual taxpayers reporting foreignearned income used a new foreign-earned income tax worksheet to figure out their tax, and to calculate the tax on nonexcluded income using tax rates that would have applied had they not claimed the exclusion. For 2016, the change in the calculation affected just over 175,000 returns, resulting in an additional \$1.3 billion in tax. For comparison, this change affected just over 210,000 returns in 2011, resulting in an additional \$1.4 billion in tax. For 2006, nearly 139,000 returns reported in total an additional \$0.8 billion in tax.

#### **Overview of Foreign Tax Credit Provisions**

For 2016, U.S. taxpayers with income from sources outside the United States, regardless of their residency, could claim a credit against their U.S. income tax liabilities for most foreign taxes paid or accrued (except for taxes paid on income excluded under the foreign-earned income provisions). The purpose of the credit, originally created in 1918, is to avoid double taxation on foreign-source income, since the United States taxes its citizens and resident aliens based on their worldwide incomes.

The foreign tax credit is subject to a limitation based on the taxpayer's total U.S. income tax liability. This prevents taxpayers from using foreign taxes paid in relatively high-taxrate countries from offsetting taxes paid on their U.S.-source incomes. The limitation is computed separately for the following categories of foreign-source income: passive income, general income, section 901(j) income, certain income re-sourced by a treaty, and lump-sum distributions from certain retirement plans. The allowable credits for each category of foreign-source income are then added together.

Passive income generally includes dividends, interest, rents, royalties, and annuities. Section 901(j) income is income earned from activities conducted in a sanctioned country; no credit is allowed for taxes paid or accrued to sanctioned countries.<sup>6</sup> Certain income re-sourced by treaty allows specific types of income to be treated as foreign-source income, if there is a tax treaty that treats it as such, and the treaty is applied. Lump-sum distributions are distributions from a retirement plan that are subject to U.S. tax using income averaging. General income is foreign income from sources outside the United States that do not fall into one of the other four categories; it includes high-taxed income that would otherwise be passive income.

In general, for taxpayers who file Form 1116, *Foreign Tax Credit*, with Form 1040, the limitation on the foreign tax credit for each type of income is calculated by multiplying the total U.S. income tax liability before credits by the ratio of the foreign-source taxable income for that type of income to total U.S. taxable income. However, not all taxpayers who claim the foreign tax credit file Form 1116 (see Data Sources and Limitations). Foreign taxes paid in excess of the limitation can be carried back 1 year and then forward for up to 10 years. Taxes carried to

<sup>&</sup>lt;sup>6</sup> A foreign tax credit is not allowed for foreign taxes paid or accrued to countries sanctioned by the U.S. Government. Nevertheless, a foreign tax credit limitation is computed for each sanctioned country. For 2016, the countries were Iran, North Korea, Sudan, and Syria.

For income from the certain income re-sourced by treaty category, a separate foreign tax credit limitation must be computed for each amount re-sourced from a treaty country.

another year are added to the taxes available for credit for that year for the same income category. Tables 3 through 5 present statistics on the foreign tax credit and related foreign-source income reported on individual income tax returns.

#### **Foreign-Source Gross Income**

Foreign-source gross income is all income earned outside the United States, except for income used to claim the foreign-earned income exclusion. Taxpayers reported \$216.7 billion in foreign-source gross income for 2016 (Figure D). This represents approximately 13.0 percent of total worldwide income for those taxpayers who reported foreign-source gross income and 2.1 percent of total worldwide income for all U.S. taxpayers. These statistics include only foreign-source gross income reported on Form 1116, because some taxpayers with this type of income do not file this form. Between 2011 and 2016, foreign-source gross income grew 19.5 percent in real terms, whereas worldwide income reported on all individual U.S. tax returns grew 14.4 percent.

Of the nearly \$216.7 billion in foreign-source gross income, taxpayers reported \$115.9 billion (or 53.5 percent) without stating a specific country, while the remaining \$100.8 billion (46.5 percent) stated a specific country. 9 The United Kingdom (\$16.7)

billion), followed by Canada (\$13.6 billion), India (\$8.8 billion), Germany (\$6.2 billion), and China (\$5.8 billion) made up the top five countries with the most foreign-source income. Of these, all but India were in the top five for 2011.

Together, the top five countries accounted for just over half (50.6 percent) of all foreign-source gross income with a stated country. Of this percent, taxpayers reported earning 16.6 percent from the United Kingdom, followed by Canada (13.5 percent), India (8.7 percent), Germany (6.1 percent), and China (5.7 percent) (Figure E).

U.S. taxpayers filing Form 1116 reported earning an average of \$47,494 in foreign-source gross income for 2016. For the top five countries, India reported the highest average foreign-source gross income (\$158,529), followed by China (\$150,073), the United Kingdom (\$139,553), Germany (\$109,085), and Canada (\$33,613) (Figure F).

Among the geographic regions with the most significant foreign-source gross income, Asia had the highest growth between 2011 and 2016. For this region, foreign-source gross income grew 62.2 percent, rising to just under \$33.1 billion for 2016, from an inflation-adjusted \$20.4 billion for 2011. Much of this increase was due to the growth in India, up 346.4 percent from \$2.0 billion for 2011 to \$8.8 billion for 2016.

Figure D
Selected Income and Credit Items, Tax Years 2011 and 2016
[Money amounts are in thousands of dollars]

| Item  | 2011 [1]      | 2016           | Percentage change |
|---|---------------|----------------|-------------------|
|   | (1)           | (2)            | (3)               |
| Worldwide income, all 1040 returns [2]:       |               |                |                   |
| Amount  | 9,099,579,323 | 10,409,880,026 | 14.4              |
| Worldwide income, returns with Form 1116 [3]: |               |                |                   |
| Amount  | 1,232,738,164 | 1,669,293,689  | 35.4              |
| Form 1116:                                    |               |                |                   |
| Foreign-source gross income:                  |               |                |                   |
| Number of returns                             | 3,575,251     | 4,555,160      | 27.4              |
| Amount  | 181,372,935   | 216,699,618    | 19.5              |
| Foreign tax credit [4]:                       |               |                |                   |
| Number of returns                             | 6,904,438     | 7,798,024      | 12.9              |
| Amount  | 17,553,444    | 20,090,001     | 14.5              |

<sup>[1]</sup> For comparability, 2011 amounts have been adjusted for inflation to 2016 constant dollars. The inflation-adjusted constant dollars are based on the Consumer Price Index (CPI-U) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, *Monthly Labor Review*. The consumer price index represents annual averages of monthly indices and approximates buying patterns of typical urban consumers.

2011 224.939 [2] Worldwide income is total income or loss reported on Form 1040 before the foreign-earned income and housing exclusions have been taken.

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<sup>[3]</sup> U.S. taxpayers file Form 1116, Foreign Tax Credit, with Form 1040, U.S. Individual Income Tax Return, per the instructions for Form 1116 (see www.irs.gov/form 1116).

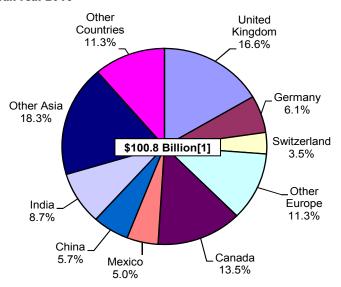
<sup>[4]</sup> Includes foreign tax credits reported on Form 1040 without a supporting Form 1116. Taxpayers with \$300 (\$600 if married filing a joint return) or less in creditable foreign taxes who also meet certain other conditions are not required to file Form 1116 to claim the foreign tax credit.

SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019

Taxpayers with \$300 (\$600 if married filing a joint return) or less in creditable foreign taxes, who met certain other conditions, mainly that the foreign-source gross income was from the passive income category, and all of the income and any foreign taxes paid on it were reported on a qualified payee statement, did not have to file Form 1116 to claim the foreign tax credit on Form 1040. Also, some taxpayers deduct their foreign taxes on Schedule A rather than taking a credit by filing Form 1116. Therefore, foreign-source income for these taxpayers would not be reported.

The \$115.9 billion of total foreign-source gross income reported without a stated country includes \$0.2 billion for high-taxed income.

Figure E
Foreign-Source Gross Income, by Selected Country or Region,
Tax Year 2016



[1] Foreign-source gross income reported on the Form 1116, Foreign Tax Credit, with stated country or region. Total foreign-source gross income (including income reported without a country or region) was \$216.7 billion. SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit. October 2019.

Despite the large growth for Asian countries, Europe continued to have the largest foreign-source gross income (\$37.8 billion), a 9.5-percent growth between 2011 and 2016. Asia had the second largest amount of foreign-source gross income (\$33.1 billion), followed by North America (\$18.6 billion). For additional data on foreign-source gross income by region or country, see Table 4.

## **Foreign Taxes and Foreign Tax Credit**

For 2016, U.S. taxpayers paid (or accrued) \$27.0 billion in foreign taxes as reported on Form 1116. This was before carrybacks, carryovers, reductions, and reclassifications. The United Kingdom, Canada, China, India, and Germany made up the top five countries in terms of foreign taxes paid or accrued and accounted for 44.2 percent of the total.

As with foreign-source gross income, the United Kingdom reported the highest amount (\$4.8 billion) and greatest share (21.9 percent) of total foreign taxes paid or accrued to a stated country. Canada was the next largest recipient of foreign taxes paid or accrued (\$2.9 billion or 13.5 percent), followed by China (nearly \$1.6 billion or 7.3 percent), India (\$1.4 billion or 6.4 percent), and Germany (\$1.3 billion or 6.1 percent). Of the \$27.0 billion in foreign taxes paid or accrued, taxpayers reported \$5.4 billion (approximately 19.9 percent of the total amount) without a stated country (Figure G). 10

Total foreign taxes paid or accrued grew 15.0 percent between 2011 and 2016. Among the most significant regions, Asia had the highest growth (47.7 percent). This was partially due to the 180.0-percent real growth in foreign taxes paid or accrued to India, as well as the 51.0-percent growth for China. Oceania showed the next highest growth (28.4 percent). Even with this growth, however, the amount paid or accrued to Oceania countries (about \$0.9 billion) was still small compared to Europe, Asia, and North America, the three largest regions in terms of foreign taxes paid. Of these regions, Europe had the highest (\$9.5 billion), followed by Asia (\$6.6 billion), and North America (\$3.6 billion) in terms of foreign taxes paid or accrued.

General limitation income, the income type for which most of the \$27.0 billion in foreign taxes reported on Form 1116 was paid or accrued, accounted for just over \$21.4 billion in foreign taxes (79.2 percent of the total). Passive income was the next largest income type with \$5.3 billion (19.6 percent of the total) in foreign taxes. Total foreign taxes available for credit after carrybacks, carryovers, reductions, and reclassifications under high-tax kickout<sup>11</sup> were \$47.3 billion, and the foreign tax credit before adjustments (gross foreign tax credit) was approximately \$19.8 billion (Table 3) (See Explanation of Selected Terms). Table 5 presents additional data on foreign taxes, by income type.

For 2016, taxpayers reported a foreign tax credit on 7.8 million individual tax returns, an increase of 12.9 percent from 6.9 million returns for 2011. The foreign tax credit grew 14.5 percent in real terms, rising \$2.5 billion from the inflation-adjusted \$17.6 billion reported for 2011, to slightly under \$20.1 billion for 2016 (Figure D).

Taxpayers with an AGI of \$10 million or more claimed \$4.2 billion in foreign tax credits, representing 20.7 percent of the total, on 12,761 returns. The \$200,000 to \$500,000 AGI category claimed the next highest amount of foreign tax credits, \$3.4 billion (17.0 percent of the total) on 1.5 million returns. The highest number of returns claiming a foreign tax credit was for taxpayers in the \$100,000 to \$200,000 AGI category; 2.4 million of these taxpayers claimed foreign tax credits totaling \$1.4 billion, or 6.9 percent of the total (Table 3).

Though the foreign tax credit grew over the 5-year period between 2011 and 2016, it fell between 2015 and 2016 (Figure H). For 2016, the total inflation-adjusted foreign tax credits claimed fell 12.1 percent. For all other years, the foreign tax credit grew, rising 13.8 percent for 2012, followed by a 4.3-percent growth for 2013, a 5.3-percent growth for 2014, and a 4.1-percent growth for 2015. The average foreign tax credit for 2016 was \$2,576, up slightly from \$2,542 (in 2016 constant dollars) for 2011.

#### **Summary**

For 2016, the total amount of foreign-earned income reported by U.S. taxpayers decreased 11.2-percent, in real terms, to just

<sup>10</sup> The \$5.4 billion of total foreign taxes paid or accrued without a stated country includes \$23.3 million in taxes paid or accrued on high-taxed income

As stipulated on Form 1116, Foreign Tax Credit, Part III, Figuring the Credit.

Figure F
Foreign-Source Gross Income and Foreign Taxes, by Selected Country or Region, Tax Years 2011 and 2016
[Money amounts are in thousands of dollars]

| Item, selected country or region     | 201                   | 1 [1]       | 20                    | 16          | Percentage change |  |
|--------------------------------------|-----------------------|-------------|-----------------------|-------------|-------------------|--|
| item, selected country of region     | Number of returns [2] | Amount      | Number of returns [2] | Amount      | in<br>amount      |  |
|                                      | (1)                   | (2)         | (3)                   | (4)         | (5)               |  |
| Foreign-source gross income, total   | 3,576,909             | 181,372,935 | 4,562,629             | 216,699,618 | 19.5              |  |
| North America                        | 336,594               | 17,768,388  | 437,829               | 18,597,685  | 4.7               |  |
| Canada                               | 319,821               | 13,800,876  | 404,782               | 13,606,129  | -1.4              |  |
| Mexico                               | 29,071                | 3,967,513   | 35,241                | 4,991,555   | 25.8              |  |
| Latin/South America                  | 26,997                | 7,685,204   | 34,782                | 3,745,373   | -51.3             |  |
| Colombia                             | 3,467                 | 4,605,520   | 3,214                 | 1,147,253   | -75.1             |  |
| Other Latin/South America            | 23,975                | 3,079,684   | 35,268                | 2,598,121   | -15.6             |  |
| Europe                               | 291,596               | 34,534,613  | 390,451               | 37,808,585  | 9.5               |  |
| Germany                              | 44,614                | 5,929,384   | 56,698                | 6,184,889   | 4.3               |  |
| Switzerland                          | 18,273                | 3,520,318   | 38,466                | 3,576,810   | 1.6               |  |
| United Kingdom                       | 103,755               | 14,818,111  | 119,642               | 16,696,352  | 12.7              |  |
| Other Europe                         | 142,586               | 10,266,796  | 211,682               | 11,350,536  | 10.6              |  |
| Asia                                 | 140,980               | 20,373,378  | 227,949               | 33,054,025  | 62.2              |  |
| China                                | 24,258                | 4,198,787   | 38,624                | 5,796,417   | 38.0              |  |
| Hong Kong                            | 8,578                 | 2,838,277   | 13,642                | 3,919,285   | 38.1              |  |
| India                                | 24,293                | 1,965,143   | 55,338                | 8,772,657   | 346.4             |  |
| Other Asia                           | 89,306                | 11,371,174  | 136,858               | 14,565,669  | 28.1              |  |
| Oceania                              | 22,867                | 2,861,947   | 32,964                | 3,488,327   | 21.9              |  |
| Australia                            | 16,929                | 2,558,691   | 21,874                | 2,793,830   | 9.2               |  |
| Other Oceania                        | 6,140                 | 303,258     | 11,846                | 694,498     | 129.0             |  |
| Other                                | 43,331                | 4,689,840   | 57,129                | 4,141,667   | -11.7             |  |
| Country not stated [3]               | 2,972,191             | 93,459,566  | 3,793,325             | 115,863,955 | 24.0              |  |
| Foreign taxes paid or accrued, total | 3,366,548             | 23,516,230  | 4,179,809             | 27,037,624  | 15.0              |  |
| North America                        | 316,829               | 2,964,831   | 389,981               | 3,623,510   | 22.2              |  |
| Canada                               | 296,762               | 2,575,775   | 361,504               | 2,917,228   | 13.3              |  |
| Mexico                               | 23,392                | 389,057     | 29,307                | 706,281     | 81.5              |  |
| Latin/South America                  | 23,406                | 694,623     | 29,094                | 555,631     | -20.0             |  |
| Colombia                             | 2,401                 | 144,188     | 3,112                 | 84,489      | -41.4             |  |
| Other Latin/South America            | 21,279                | 550,436     | 28,901                | 471,140     | -14.4             |  |
| Europe                               | 264,856               | 8,862,002   | 332,587               | 9,479,654   | 7.0               |  |
| Germany                              | 42,952                | 1,129,760   | 47,855                | 1,315,910   | 16.5              |  |
| Switzerland                          | 16,692                | 939,581     | 33,615                | 813,792     | -13.4             |  |
| United Kingdom                       | 92,524                | 4,738,373   | 96,382                | 4,753,335   | 0.3               |  |
| Other Europe                         | 127,603               | 2,054,289   | 179,267               | 2,596,620   | 26.4              |  |
| Asia                                 | 133,848               | 4,457,701   | 202,268               | 6,586,054   | 47.7              |  |
| China                                | 21,861                | 1,047,668   | 33,287                | 1,581,604   | 51.0              |  |
| Hong Kong                            | 7,715                 | 422,331     | 10,110                | 488,330     | 15.6              |  |
| India                                | 22,982                | 493,890     | 51,249                | 1,383,024   | 180.0             |  |
| Other Asia                           | 84,660                | 2,493,809   | 117,789               | 3,133,098   | 25.6              |  |
| Oceania                              | 20,897                | 688,279     | 30,514                | 883,424     | 28.4              |  |
| Australia                            | 15,107                | 638,072     | 19,742                | 726,387     | 13.8              |  |
| Other Oceania                        | 5,921                 | 50,207      | 11,285                | 157,037     | 212.8             |  |
| Other                                | 34,608                | 724,103     | 44,661                | 529,150     | -26.9             |  |
| Country not stated [4]               | 2,751,865             | 5,124,690   | 3,419,447             | 5,380,195   | 5.0               |  |

[1] For comparability, 2011 amounts have been adjusted for inflation to 2016 constant dollars. The inflation-adjusted constant dollars are based on the Consumer Price Index (CPI-U) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, *Monthly Labor Review*. The consumer price index represents annual averages of monthly indices and approximates buying patterns of typical urban consumers.

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over \$51.4 billion, compared to the total amount reported for 2011. Returns from all named regions showed decreases in total foreign-earned income reported in real terms. Returns from Asian-based countries realized the largest decrease (in real dollars), falling by more than \$3.6 billion, while European-based

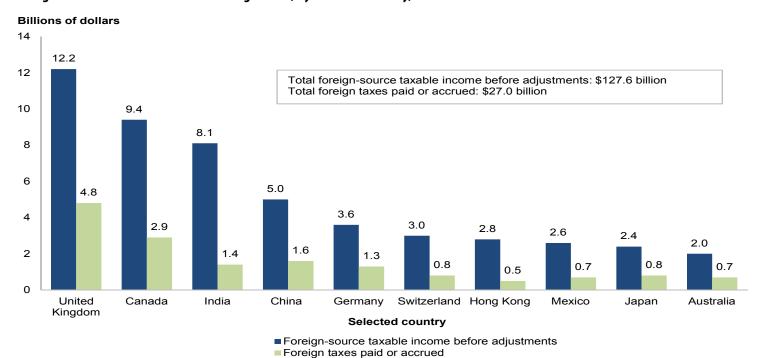
countries (down \$1.9 billion), North American-based countries (down \$1.0 billion) and Latin/South American countries (down \$0.4 billion) showed sizable losses. The number of returns filed reporting the exclusion for 2016 increased 7.4 percent to over 482,000 returns.

<sup>[2]</sup> Number of returns detail does not add to total because taxpayers may report data for more than one country per return.

<sup>[3]</sup> For Tax Year 2016 the \$115.9 billion of total foreign-source gross income reported without a specific country or region being stated includes \$0.2 billion for high-taxed income.

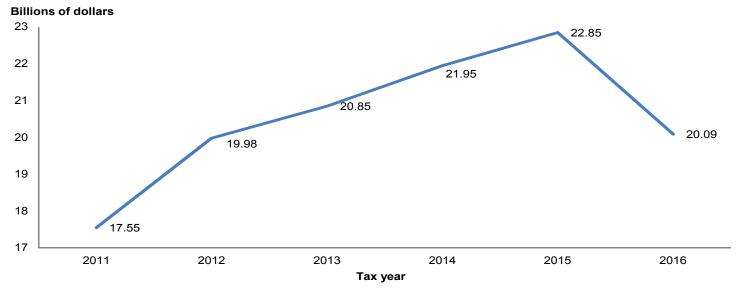
<sup>[4]</sup> For Tax Year 2016 the \$5.4 billion of total foreign taxes paid or accrued reported without a specific country or region being stated includes \$23.3 million for high-taxed income. NOTES: Detail may not add to totals because of rounding. Data are from Forms 1116, Foreign Tax Credit, which U.S. taxpayers file with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

Figure G
Foreign-Source Taxable Income and Foreign Taxes, by Selected Country, Tax Year 2016



NOTE: Data are from Forms 1116, Foreign Tax Credit, which U.S. taxpayers file with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

Figure H
Foreign Tax Credit, Tax Years 2011–2016



NOTES: For comparability, all amounts have been adjusted for inflation to 2016 constant dollars. The inflation-adjusted constant dollars are based on the Consumer Price Index (CPI-U) computed and reported by the U.S. Department of Labor, Bureau of Labor Statistics, *Monthly Labor Review*.

Year CPI-U
2016 240.007

2016 240.007 2015 237.017 2014 236.736 2013 232.957 2012 229.594 2011 224.939

Data are from Forms 1116, Foreign Tax Credit, which U.S. taxpayers file with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income Division, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

Taxpayers with a tax home in the United Kingdom reported the most foreign-earned income (just over \$4.8 billion), while China-based taxpayers reported the second highest amount of foreign-earned income (at just over \$3.3 billion). Taxpayers from Hong Kong had a 4.4-percent increase to \$3.2 billion in 2016, and represented the third highest source of foreign-earned income. Taxpayers reporting foreign-earned income from Canada fell from the second largest source of foreign-earned income in 2011 to the fourth largest source in 2016, with \$3.1 billion reported. The total amount of housing exclusion claimed decreased by 20.3 percent, from \$1.7 billion reported for 2011 to \$1.3 billion for 2016.

Foreign-source gross income reported by U.S. taxpayers reached nearly \$216.7 billion for 2016, and the total foreign tax credit claimed was just under \$20.1 billion. In real terms, this represents a 19.5-percent growth in foreign-source gross income and a 14.5-percent growth in the foreign tax credit from 2011, the last year a study was prepared on these data. As the source of \$37.8 billion in foreign-source gross income and the recipient of \$9.5 billion in foreign taxes paid, European countries were the largest component of these measures. The United Kingdom had the largest of these measures, with \$16.7 billion in foreign-source gross income and \$4.8 billion in foreign taxes paid. However, it was Asian countries with the largest growth in these measures. Foreign-source gross income grew 62.2 percent and foreign taxes paid grew 47.7 percent. Additionally, taxpayers claimed a foreign tax credit on 7.8 million returns, an increase of 12.9 percent from 2011.

#### **Data Sources and Limitations**

The IRS Statistics of Income Division (SOI) based the 2016 data presented in this article on a sample of individual income tax returns, Forms 1040, processed during Calendar Year 2017. These returns had one or more of the following: a foreign tax credit, an attached Form 1116, a foreign-earned income exclusion, a housing exclusion or housing deduction, or an attached Form 2555 or Form 2555-EZ. SOI understated the foreign-source income and taxes in this article to the extent that they either were not, or did not, have to be reported on Form 1116 to support the foreign tax credit claimed on Form 1040. Taxpayers with \$300 (\$600 if married filing a joint return) or less in creditable foreign taxes who also met certain other conditions were not required to file Form 1116 to claim the foreign tax credit. Therefore, about 54.6 percent of Forms 1040 (as originally filed) with a foreign tax credit did not include the supporting Form 1116. The average foreign tax credit reported on these returns was \$70. Foreignsource income and losses are also understated to the extent that taxpavers who were not eligible for a credit did not file Form 1116. Taxpayers who had foreign-source income but paid no taxes or had no U.S. tax liability before credits, could not claim a foreign tax credit.

About 1.9 percent of the sampled returns with a foreign tax credit or an attached Form 1116, and 12.2 percent of the sampled returns with an attached Form 2555 or Form 2555-EZ were for tax years prior to 2016, reported on delinquent returns. Because these prior-year returns were processed during the 2016 filing

period, SOI included them as a representation of 2016 returns filed after December 31, 2017. The sampled returns used for the statistics do not reflect adjustments made during audit examination, which determines the acceptability of the reported data.

SOI stratified the sample based on the: (1) presence or absence of Form 2555, Foreign Earned Income, Form 2555-EZ, Foreign Earned Income Exclusion, and Form 1116, Foreign Tax Credit; (2) presence or absence of other specific forms or schedules; (3) larger of positive income or negative income; (4) size of business and farm receipts; and (5) usefulness of returns for tax policy modeling purposes. The data for 2016 from Form 2555 and Form 1116 are based on a sample of 134,787 returns drawn from a total population of 11,623,072 returns. For a general description of the sampling procedures and data limitations of Statistics of Income tabulations, see Statistics of Income, Individual Income Tax Returns Complete Report 2016, (IRS Publication 1304) and the appendix to this issue of the Bulletin.

#### **Additional Tabular Data on Tax Stats**

For additional Form 2555 and Form 1116 data, see the Individual section of the Tax Stats Web pages at <a href="http://www.irs.gov/uac/SOI-Tax-Stats-Individual-Income-Tax-Return-Form-1040-Statistics">http://www.irs.gov/uac/SOI-Tax-Stats-Individual-Income-Tax-Return-Form-1040-Statistics</a>. This site includes data on foreign-earned income and the foreign tax credit, by form, tax year, country or region, type of income, and size of adjusted gross income. Since 1991, the IRS Statistics of Income (SOI) Division has published these data in 5-year intervals. *SOI Bulletin* articles are also available for 1996, 2001, 2006, and 2011.

#### **Explanation of Selected Terms**

Definitions used in this article are generally the same as those in *Statistics of Income, Individual Income Tax Returns Complete Report 2016* (IRS Publication 1304). The following is a partial list of definitions for terms that cannot be found in IRS Publication 1304.

Foreign Taxes Available for Credit—This is total foreign taxes paid or accrued plus carryovers, less reductions in foreign taxes, and adjusted for taxes reclassified under high-tax kick out.

Foreign Tax Credit Adjustments—These include reductions for participation in unsanctioned international boycotts and increases permitted by tax treaties between the United States and certain foreign countries.

Foreign Source Taxable Income—This is foreign-source gross income less deductions and losses. The deductions include any expenses directly related to foreign-source income, a prorated share of the taxpayer's itemized or standard deductions, and a prorated share of interest expenses.

Gross Foreign Tax Credit—This is foreign tax credits before being limited to tax and before foreign tax credit adjustments are taken.

Worldwide Income—This is the total income or loss reported on Form 1040 before taxpayers claim the foreign-earned income and foreign housing exclusions. It includes salaries and wages; taxable interest; dividends; taxable refunds of State and local income taxes; alimony received; business income or loss; capital gains or losses; taxable distributions from an IRA;

taxable pensions and annuities; income or loss from rents, royalties, partnerships, S corporations, and estates and trusts; farm income or loss; unemployment compensation; taxable Social Security benefits, and other income or losses.

This article was written by Scott Hollenbeck and Maureen Keenan Kahr, economists with the Individual Data Processing and Perfection Section, under the direction of Mike Strudler, Initiatives Manager.

Table 1. Individual Income Tax Returns With Form 2555: Sources of Income, Deductions, Tax Items, and Foreign-Earned Income and Exclusions, by Size of Adjusted Gross Income, Tax Year 2016
[All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                       |                      | Selected in                | ncome, adjustm        | nent, deduction | , and credit iten | ns reported on | Form 1040            |         |
|--|-----------------------|----------------------|----------------------------|-----------------------|-----------------|-------------------|----------------|----------------------|---------|
| Size of adjusted gross income                | Number of returns [1] | Adjusted<br>gross    | gross Worldwide income [2] | Salaries and<br>wages |                 | Foreign income ex |                | Total<br>adjustments |         |
|  |                       | income<br>or deficit |                            | Number of returns     | Amount          | Number of returns | Amount         | Number of returns    | Amount  |
|  | (1)                   | (2)                  | (3)                        | (4)                   | (5)             | (6)               | (7)            | (8)                  | (9)     |
| All returns                                  | 482,640               | 39,355,289           | 70,550,364                 | 456,387               | 56,216,517      | 476,272           | 29,187,471     | 97,484               | 665,787 |
| No adjusted gross income (includes deficits) | 130,643               | -719,027             | 5,432,804                  | 121,662               | 5,795,236       | 127,977           | 6,000,027      | 25,144               | 80,105  |
| \$1 under \$10,000                           | 136,421               | 358,804              | 7,444,518                  | 129,601               | 6,971,753       | 135,267           | 6,981,570      | 17,886               | 46,149  |
| \$10,000 under \$25,000                      | 47,284                | 783,142              | 3,944,187                  | 44,677                | 3,381,707       | 47,133            | 3,048,388      | 11,082               | 36,979  |
| \$25,000 under \$50,000                      | 45,108                | 1,627,360            | 4,907,567                  | 42,156                | 4,090,758       | 43,893            | 3,107,750      | 11,456               | 51,145  |
| \$50,000 under \$75,000                      | 27,516                | 1,684,197            | 3,756,420                  | 26,299                | 3,098,069       | 27,152            | 1,935,852      | 7,632                | 45,615  |
| \$75,000 under \$100,000                     | 19,541                | 1,694,963            | 3,298,482                  | 18,761                | 2,727,424       | 19,325            | 1,492,371      | 5,420                | 43,830  |
| \$100,000 under \$200,000                    | 34,739                | 4,884,318            | 8,068,800                  | 33,564                | 6,839,661       | 34,543            | 2,864,975      | 8,614                | 94,411  |
| \$200,000 under \$500,000                    | 27,634                | 8,468,346            | 11,360,276                 | 26,824                | 9,641,444       | 27,402            | 2,462,443      | 6,485                | 85,294  |
| \$500,000 under \$1,000,000                  | 8,753                 | 5,994,114            | 7,063,472                  | 8,339                 | 5,711,267       | 8,652             | 824,003        | 2,131                | 72,246  |
| \$1,000,000 under \$1,500,000                | 2,215                 | 2,656,814            | 2,954,862                  | 2,051                 | 2,197,399       | 2,191             | 210,361        | 642                  | 34,851  |
| \$1,500,000 under \$2,000,000                | 1,006                 | 1,737,031            | 1,875,473                  | 869                   | 1,213,811       | 984               | 92,786         | 339                  | 25,681  |
| \$2,000,000 under \$5,000,000                | 1,330                 | 3,934,759            | 4,125,839                  | 1,183                 | 2,435,163       | 1,314             | 125,345        | 459                  | 33,732  |
| \$5,000,000 under \$10,000,000               | 290                   | 1,937,193            | 1,978,200                  | 259                   | 1,061,603       | 284               | 26,921         | 116                  | 7,665   |
| \$10,000,000 or more                         | 161                   | 4,313,275            | 4,339,463                  | 143                   | 1,051,221       | 154               | 14,679         | 77                   | 8,084   |

Footnotes at end of tables.

Table 1. Individual Income Tax Returns With Form 2555: Sources of Income, Deductions, Tax Items, and Foreign-Earned Income and Exclusions, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  | Selected          | d income, adjust | ment, deduction,      | , and credit items | s reported on Fo  | rm 1040   | Selected income, exclusions,<br>and deductions reported on<br>Form 2555 |                                     |  |
|--|-------------------|------------------|-----------------------|--------------------|-------------------|-----------|---|-------------------------------------|--|
| Size of adjusted gross income                | Taxable<br>income |                  | Foreign tax<br>credit |                    | Total ii<br>ta    |           | Number of<br>Forms 2555<br>filed by                                     | Number of<br>Forms 2555<br>filed by |  |
|  | Number of returns | Amount           | Number of returns     | Amount             | Number of returns | Amount    | primary<br>taxpayer   | secondary<br>taxpayer               |  |
|  | (10)              | (11)             | (12)                  | (13)               | (14)              | (15)      | (16)  | (17)                                |  |
| All returns                                  | 183,769           | 34,227,925       | 105,930               | 5,235,067          | 152,203           | 5,456,216 | 465,930   | 59,554                              |  |
| No adjusted gross income (includes deficits) | 0                 | 0                | 0                     | 0                  | * 105             | * 230     | 129,607   | 9,383                               |  |
| \$1 under \$10,000                           | * 387             | * 87             | * 377                 | * 45               | * 680             | * 248     | 134,517   | 12,050                              |  |
| \$10,000 under \$25,000                      | 21,201            | 116,200          | 8,917                 | 8,177              | 13,270            | 13,495    | 45,538  | 7,176                               |  |
| \$25,000 under \$50,000                      | 39,690            | 688,112          | 16,555                | 50,257             | 28,625            | 87,640    | 42,520  | 7,272                               |  |
| \$50,000 under \$75,000                      | 27,045            | 1,028,391        | 12,738                | 82,770             | 21,798            | 133,363   | 25,026  | 5,253                               |  |
| \$75,000 under \$100,000                     | 19,454            | 1,193,096        | 10,805                | 103,488            | 16,436            | 172,425   | 17,816  | 3,751                               |  |
| \$100,000 under \$200,000                    | 34,641            | 3,896,215        | 21,252                | 420,149            | 31,599            | 587,538   | 31,658  | 7,203                               |  |
| \$200,000 under \$500,000                    | 27,601            | 7,568,382        | 22,442                | 1,154,363          | 26,286            | 1,103,177 | 25,940  | 5,293                               |  |
| \$500,000 under \$1,000,000                  | 8,753             | 5,694,747        | 8,086                 | 1,040,474          | 8,497             | 909,092   | 8,443   | 1,443                               |  |
| \$1,000,000 under \$1,500,000                | 2,214             | 2,550,150        | 2,082                 | 499,820            | 2,172             | 409,541   | 2,145   | 346                                 |  |
| \$1,500,000 under \$2,000,000                | 1,006             | 1,662,533        | 966                   | 321,437            | 980               | 279,040   | 981   | 144                                 |  |
| \$2,000,000 under \$5,000,000                | 1,326             | 3,784,679        | 1,274                 | 717,058            | 1,309             | 640,414   | 1,293   | 201                                 |  |
| \$5,000,000 under \$10,000,000               | 290               | 1,865,255        | 280                   | 335,840            | 288               | 324,373   | 288   | 22                                  |  |
| \$10,000,000 or more                         | 161               | 4,180,077        | 155                   | 501,189            | 159               | 795,640   | 159   | 16                                  |  |

Footnotes at end of table.

Table 1. Individual Income Tax Returns With Form 2555: Sources of Income, Deductions, Tax Items, and Foreign-Earned Income and Exclusions, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  | Selected income, exclusions, and deductions reported on Form 2555 |            |                               |            |                   |            |   |           |  |  |
|--|---|------------|-------------------------------|------------|-------------------|------------|---|-----------|--|--|
| Size of adjusted gross income                | Total foreign-<br>earned income                                   |            | Foreign-ear<br>reported on Fo |            | Salarie<br>waç    |            | Business or professional income (less loss) |           |  |  |
|  | Number of returns   | Amount     | Number of returns             | Amount     | Number of returns | Amount     | Number of returns                           | Amount    |  |  |
|  | (18)  | (19)       | (20)                          | (21)       | (22)              | (23)       | (24)  | (25)      |  |  |
| All returns                                  | 481,337   | 51,425,521 | 383,553                       | 46,794,774 | 357,277           | 37,362,582 | 35,149                                      | 2,104,255 |  |  |
| No adjusted gross income (includes deficits) | 129,670   | 6,277,255  | 84,193                        | 4,212,917  | 76,685            | 3,740,094  | 9,416                                       | 331,620   |  |  |
| \$1 under \$10,000                           | 136,495   | 7,255,516  | 103,416                       | 5,641,328  | 97,328            | 5,234,100  | 10,006                                      | 297,877   |  |  |
| \$10,000 under \$25,000                      | 47,328  | 3,476,224  | 40,766                        | 3,144,254  | 37,788            | 2,838,944  | 4,148                                       | 168,392   |  |  |
| \$25,000 under \$50,000                      | 44,309  | 3,967,808  | 38,597                        | 3,685,848  | 36,395            | 3,387,123  | 2,823                                       | 137,368   |  |  |
| \$50,000 under \$75,000                      | 27,483  | 2,838,024  | 24,293                        | 2,707,366  | 22,577            | 2,415,177  | 2,386                                       | 121,462   |  |  |
| \$75,000 under \$100,000                     | 19,487  | 2,499,602  | 17,975                        | 2,423,695  | 17,026            | 2,120,292  | 1,596                                       | 141,770   |  |  |
| \$100,000 under \$200,000                    | 34,928  | 5,921,790  | 33,297                        | 5,834,552  | 31,466            | 4,959,745  | 2,338                                       | 249,577   |  |  |
| \$200,000 under \$500,000                    | 27,841  | 8,058,933  | 27,398                        | 8,033,633  | 25,836            | 6,031,017  | 1,657                                       | 248,908   |  |  |
| \$500,000 under \$1,000,000                  | 8,777   | 4,618,297  | 8,642                         | 4,601,096  | 7,913             | 2,918,078  | 453   | 157,569   |  |  |
| \$1,000,000 under \$1,500,000                | 2,228   | 1,734,783  | 2,201                         | 1,733,872  | 1,952             | 1,026,815  | 106   | 44,627    |  |  |
| \$1,500,000 under \$2,000,000                | 1,007   | 1,111,122  | 1,001                         | 1,110,935  | 821               | 613,398    | 85  | 71,031    |  |  |
| \$2,000,000 under \$5,000,000                | 1,332   | 1,941,138  | 1,322                         | 1,940,299  | 1,102             | 1,090,768  | 95  | 63,761    |  |  |
| \$5,000,000 under \$10,000,000               | 291   | 791,846    | 291                           | 791,796    | 251               | 463,140    | 23  | 37,706    |  |  |
| \$10,000,000 or more                         | 161   | 933,183    | 161                           | 933,183    | 139               | 523,890    | 16  | 32,588    |  |  |

Table 1. Individual Income Tax Returns With Form 2555: Sources of Income, Deductions, Tax Items, and Foreign-Earned Income and Exclusions, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  | Selected income, exclusions, and deductions reported on Form 2555 |           |                   |          |                               |                                  |                                  |        |  |  |
|--|---|-----------|-------------------|----------|-------------------------------|----------------------------------|----------------------------------|--------|--|--|
| Size of adjusted gross income                | Partnership income (less loss)                                    |           | Nonc              |          | Allowances, re or expenses pa | imbursements,<br>id by employers | Less: meals and lodging excluded |        |  |  |
|  | Number of returns   | Amount    | Number of returns | Amount   | Number of returns             | Amount                           | Number of returns                | Amount |  |  |
|  | (26)  | (27)      | (28)              | (29)     | (30)                          | (31)                             | (32)                             | (33)   |  |  |
| All returns                                  | 2,700   | 1,239,667 | 14,915            | 231,250  | 43,264                        | 5,228,113                        | 5,476                            | 61,591 |  |  |
| No adjusted gross income (includes deficits) | 631   | 31,176    | 4,376             | 54,661   | 2,935                         | 54,856                           | 1,641                            | 24,284 |  |  |
| \$1 under \$10,000                           | * 207   | * 2,275   | 3,857             | 33,830   | 4,926                         | 60,793                           | 964                              | 7,304  |  |  |
| \$10,000 under \$25,000                      | * 121   | * 15,633  | 1,328             | 24,702   | 2,206                         | 51,022                           | 130                              | 2,665  |  |  |
| \$25,000 under \$50,000                      | * 49  | * 4,635   | 1,239             | 13,232   | 3,803                         | 129,605                          | 637                              | 7,230  |  |  |
| \$50,000 under \$75,000                      | * 240   | * 46,843  | 750               | 9,798    | 2,482                         | 99,341                           | 180                              | 1,159  |  |  |
| \$75,000 under \$100,000                     | * 155   | * 19,392  | 329               | 5,316    | 2,366                         | 113,102                          | 306                              | 3,056  |  |  |
| \$100,000 under \$200,000                    | 185   | 27,792    | 777               | 17,703   | 7,131                         | 533,956                          | 834                              | 6,604  |  |  |
| \$200,000 under \$500,000                    | 280   | 92,087    | 1,488             | 44,546   | 10,746                        | 1,526,281                        | 697                              | 8,113  |  |  |
| \$500,000 under \$1,000,000                  | 301   | 155,886   | 548               | 18,546   | 4,386                         | 1,239,416                        | 73                               | 1,049  |  |  |
| \$1,000,000 under \$1,500,000                | 171   | 132,831   | ** 219            | ** 8,916 | 1,192                         | 482,486                          | ** 16                            | ** 127 |  |  |
| \$1,500,000 under \$2,000,000                | 133   | 167,891   | **                | **       | 392                           | 209,513                          | **                               | **     |  |  |
| \$2,000,000 under \$5,000,000                | 168   | 263,008   | **                | **       | 553                           | 467,604                          | **                               | **     |  |  |
| \$5,000,000 under \$10,000,000               | 37  | 90,878    | **                | **       | 104                           | 143,174                          | **                               | **     |  |  |
| \$10,000,000 or more                         | 23  | 189,340   | **                | **       | 42                            | 116,964                          | **                               | **     |  |  |

Footnotes at end of table.

#### Table 1. Individual Income Tax Returns With Form 2555: Sources of Income, Deductions, Tax Items, and Foreign-Earned Income and Exclusions, by Size of Adjusted Gross Income, Tax Year 2016—Continued

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

|  |   | Se      | elected income, e          | exclusions, and | deductions repo   | rted on Form 25 | 555                  |        |
|--|---|---------|----------------------------|-----------------|-------------------|-----------------|----------------------|--------|
| Size of adjusted gross income                | Other foreign-earned income (less loss) |         | Foreign-ear exclusion befo |                 | Hou<br>exclu      | •               | Housing<br>deduction |        |
|  | Number of returns                       | Amount  | Number of returns          | Amount          | Number of returns | Amount          | Number of returns    | Amount |
|  | (34)                                    | (35)    | (36)                       | (37)            | (38)              | (39)            | (40)                 | (41)   |
| All returns                                  | 10,684                                  | 690,497 | 479,105                    | 29,557,323      | 63,325            | 1,341,816       | 4,367                | 78,285 |
| No adjusted gross income (includes deficits) | 2,121                                   | 24,794  | 128,712                    | 6,068,717       | 4,552             | 71,699          | 274                  | 2,334  |
| \$1 under \$10,000                           | 2,569                                   | 19,757  | 135,897                    | 7,066,673       | 5,065             | 57,995          | 285                  | 5,399  |
| \$10,000 under \$25,000                      | 1,167                                   | 48,226  | 47,327                     | 3,101,545       | 5,421             | 75,678          | 460                  | 3,119  |
| \$25,000 under \$50,000                      | 574                                     | 21,115  | 44,194                     | 3,144,196       | 7,702             | 121,312         | 492                  | 3,421  |
| \$50,000 under \$75,000                      | 488                                     | 15,904  | 27,382                     | 1,965,716       | 5,270             | 90,756          | 552                  | 6,474  |
| \$75,000 under \$100,000                     | 498                                     | 26,879  | 19,422                     | 1,508,249       | 3,926             | 67,318          | 416                  | 5,509  |
| \$100,000 under \$200,000                    | 1,081                                   | 52,383  | 34,795                     | 2,898,151       | 10,668            | 225,096         | 616                  | 11,407 |
| \$200,000 under \$500,000                    | 1,111                                   | 98,906  | 27,645                     | 2,486,047       | 12,987            | 344,193         | 456                  | 7,408  |
| \$500,000 under \$1,000,000                  | 617                                     | 112,649 | 8,748                      | 834,626         | 5,084             | 173,109         | 346                  | 13,313 |
| \$1,000,000 under \$1,500,000                | 161                                     | 42,355  | 2,217                      | 214,898         | 1,308             | 52,836          | 165                  | 6,654  |
| \$1,500,000 under \$2,000,000                | 96                                      | 47,820  | 998                        | 96,935          | 477               | 19,975          | 125                  | 5,675  |
| \$2,000,000 under \$5,000,000                | 134                                     | 53,251  | 1,323                      | 128,704         | 669               | 32,002          | 125                  | 5,308  |
| \$5,000,000 under \$10,000,000               | 41                                      | 56,290  | 288                        | 27,770          | 130               | 6,420           | 31                   | 1,310  |
| \$10,000,000 or more                         | 25                                      | 70,168  | 156                        | 15,095          | 66                | 3,426           | 23                   | 955    |

<sup>\*</sup>Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>\*\*</sup>Data combined to avoid disclosure of information for specific taxpayers. Data are included in the appropriate totals.

<sup>[1]</sup> Includes returns with no foreign-earned income, but filed Form 2555, Foreign Earned Income, to claim an exclusion for a prior year or for reporting purposes.

<sup>[2]</sup> Worldwide income is total income or loss reported on Form 1040, U.S. Individual Income Tax Return, before the foreign-earned income and housing exclusions have been taken.

<sup>[3]</sup> Amount reported on Form 1040 is the total amount of the foreign-earned income exclusion after subtracting deductions allocable to excluded income.

NOTE: Detail may not add to totals because of rounding. Data are from Forms 2555, Foreign Earned Income, filed by U.S. taxpayers with Form 1040, U.S. Individual Income Tax Return.

Table 2. Individual Income Tax Returns With Form 2555: Foreign-Earned Income, Exclusion before Deductions, Housing Exclusion, and Housing Deduction, by Country or Region, Tax Year 2016
[All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                             |                                       |                            | Fo   | reign-earned inco                    | me                     |                   |
|--|-----------------------------|---------------------------------------|----------------------------|--|--------------------------------------|------------------------|-------------------|
|  |                             |                                       |                            |  |                                      | Total nonce            | ash income        |
| Country or region                        | Number<br>of<br>returns [1] | Total<br>foreign-<br>earned<br>income | Salaries<br>and<br>wages   | Business or<br>professional<br>income<br>(less loss) | Partnership<br>income<br>(less loss) | Total [2]              | Home<br>(lodging) |
|  | (1)                         | (2)                                   | (3)                        | (4)  | (5)                                  | (6)                    | (7)               |
| All geographic areas                     | 482,640                     | 51,425,521                            | 37,362,582                 | 2,104,255  | 1,239,667                            | 231,250                | 159,684           |
| North America, total                     | 55,545                      | 3,721,948                             | 2,803,417                  | 271,926  | 17,827                               | 1,303                  | * 913             |
| Canada                                   | ** 49,518                   | ** 3,072,689                          | ** 2,303,606               | 232,931  | 12,059                               | * 733                  | ** 913            |
| Greenland                                | **                          | **                                    | **                         | 0  | 0                                    | 0                      | 0                 |
| Mexico                                   | 6,027                       | 649,259                               | 499,811                    | 38,995   | * 5,768                              | 570                    |                   |
| Latin and South America, total           | <b>14,557</b><br>867        | <b>1,506,601</b><br>77,789            | <b>970,079</b> 54,062      | <b>121,950</b><br>* 8,708                            | 100,244                              | 7,200                  | <b>3,773</b>      |
| Argentina  Brazil                        | 3,382                       | 460,641                               | 249,782                    | 15,927   | 80,883                               | 1,220                  | * 844             |
| Chile                                    | 1,547                       | 154,483                               | 121,637                    | * 12,969   | **                                   | * 2,268                | * 287             |
| Colombia                                 | 1,510                       | 190,506                               | 148,510                    | * 9,151  | * 5,486                              | * 485                  | * 439             |
| Costa Rica                               | 1,573                       | 147,128                               | 77,092                     | * 18,375   | * 6,706                              | **                     | **                |
| Panama                                   | 1,052                       | 94,030                                | 64,518                     | * 1,206  | **                                   | * 691                  | **                |
| Peru                                     | 1,470                       | 135,819                               | 72,808                     | * 31,104   | 0                                    | **                     | 0                 |
| Venezuela                                | 301                         | 45,001                                | 35,751                     | **   | 0                                    | 0                      | 0                 |
| Other Latin and South American countries | 2,857                       | 201,203                               | 145,918                    | ** 24,510  | ** 7,169                             | ** 2,536               | ** 2,203          |
| Caribbean, total                         | 7,249                       | 914,613                               | 713,335                    | 30,242   | * 5,215                              | 4,935                  | * 2,985           |
| Bahamas                                  | 1,173                       | 91,833                                | 63,484                     | **   | 0                                    | * 2,361                | * 2,361           |
| Bermuda                                  | 1,001                       | 371,163                               | 309,948                    | * 8,351  | * 3,578                              | **                     | **                |
| Cayman Islands                           | 1,704                       | 172,187                               | 121,102                    | **   | **                                   | **                     | **                |
| Dominican Republic  Jamaica              | 968<br>434                  | 82,071<br>18,832                      | 61,341<br>12,344           | 0  | 0                                    | **                     | 0                 |
| Other Caribbean countries                | 1,969                       | 178,526                               | 145,116                    | ** 21,890  | ** 1,637                             | ** 2,575               | ** 624            |
| Europe, total                            | 126,775                     | 13,443,913                            | 9,197,942                  | 784,268  | 639,035                              | 29,227                 | 16,264            |
| Austria                                  | 2,430                       | 155,976                               | 110,048                    | * 5,895  | 0                                    | 0                      | 0                 |
| Belgium                                  | 2,084                       | 196,919                               | 119,493                    | 7,665  | * 2,440                              | 3,317                  | * 2,635           |
| Czech Republic                           | 2,347                       | 160,148                               | 93,566                     | * 31,886   | **                                   | 0                      | 0                 |
| Denmark                                  | 1,179                       | 133,363                               | 116,060                    | * 1,423  | 0                                    | **                     | **                |
| Finland                                  | 994                         | 62,387                                | 48,871                     | 0  | **                                   | 0                      | 0                 |
| France                                   | 12,800                      | 1,179,577                             | 784,121                    | 97,350   | 54,268                               | * 949                  | **                |
| Germany                                  | 21,046                      | 1,720,380                             | 1,158,076                  | 126,960  | 53,490                               | 2,268                  | * 1,396           |
| Greece                                   | 1,870                       | 122,133                               | 77,765                     | 11,169   | * 11,505                             | **                     | 0                 |
| Hungary                                  | 303                         | 46,253                                | 34,195                     | **   | **                                   | 0<br>**                | 0                 |
| Ireland                                  | 1,066                       | 115,895                               | 83,922                     | 4,868  | * 7.072                              |                        | C                 |
|  | 5,325<br>307                | 481,592<br>63,352                     | 292,885<br>52,040          | 42,322<br>**   | * 7,072<br>0                         | * 453<br>* 214         | 0                 |
| Netherlands                              | 7,064                       | 681,070                               | 435,973                    | 50,037   | * 4,550                              | * 65                   | 0                 |
| Norway                                   | 2,013                       | 158,046                               | 94,205                     | * 4,218  | **                                   | **                     | 0                 |
| Poland                                   | 1,191                       | 99,573                                | 69,880                     | * 4,239  | **                                   | **                     | **                |
| Russia                                   | 1,420                       | 312,839                               | 246,619                    | 15,582   | * 9,452                              | 678                    | * 445             |
| Spain                                    | 3,476                       | 269,470                               | 196,058                    | 27,501   | * 7,687                              | * 164                  | **                |
| Sweden                                   | 3,973                       | 222,141                               | 160,598                    | * 7,390  | 0                                    | **                     | 0                 |
| Switzerland                              | 13,235                      | 1,907,327                             | 1,457,172                  | 56,285   | * 16,680                             | 4,406                  | * 3,259           |
| Turkey                                   | 2,314                       | 229,134                               | 167,342                    | * 10,854   | **                                   | * 1,086                | **                |
| United Kingdom                           | 35,752                      | 4,827,930                             | 3,182,417                  | 250,479  | 448,264                              | 10,845                 | 4,487             |
| Other European countries                 | 4,587                       | 298,408                               | 216,639                    | ** 28,145  | ** 23,627<br>* 3 440                 | ** 4,779               | ** 4,041          |
| Africa, total                            | <b>16,124</b><br>367        | <b>1,608,955</b><br>109,761           | <b>1,112,155</b><br>52,216 | <b>65,425</b>  | * <b>3,119</b><br>0                  | <b>13,064</b><br>1,067 | <b>8,076</b>      |
| Angola  Egypt                            | 1,491                       | 148,424                               | 86,209                     | * 7,644  | **                                   | 1,067                  |                   |
| Kenya                                    | 1,431                       | 136,836                               | 105,434                    | * 7,602  | **                                   | * 554                  | **                |
| Morocco                                  | 762                         | 41,132                                | 17,030                     | **   | 0                                    | * 955                  | **                |
| Nigeria                                  | 1,317                       | 253,481                               | 165,814                    | **   | **                                   | 4,736                  | 3,585             |
| South Africa                             | 2,201                       | 199,339                               | 135,444                    | * 8,462  | 0                                    | 1,460                  | * 49              |
| Other African countries                  | 8,560                       | 719,977                               | 550,008                    | ** 41,720  | ** 3,120                             | 4,294                  | ** 4,442          |

Table 2. Individual Income Tax Returns With Form 2555: Foreign-Earned Income, Exclusion before Deductions, Housing Exclusion, and Housing Deduction, by Country or Region, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                             |                                       |                          | Fo   | reign-earned inco                    | me          |                   |
|--|-----------------------------|---------------------------------------|--------------------------|--|--------------------------------------|-------------|-------------------|
|  |                             |                                       |                          |  |                                      | Total nonca | sh income         |
| Afghanistan China Hong Kong India Indonesia Iraq Israel Japan Kuwait Lebanon Malaysia Philippines Qatar Saudi Arabia Singapore | Number<br>of<br>returns [1] | Total<br>foreign-<br>earned<br>income | Salaries<br>and<br>wages | Business or<br>professional<br>income<br>(less loss) | Partnership<br>income<br>(less loss) | Total [2]   | Home<br>(lodging) |
|  | (1)                         | (2)                                   | (3)                      | (4)  | (5)                                  | (6)         | (7)               |
| Asia, total  | 180,257                     | 22,907,737                            | 16,975,031               | 521,005  | 370,412                              | 141,593     | 105,285           |
| Afghanistan  | 7,454                       | 908,969                               | 813,395                  | * 12,399   | **                                   | * 4,205     | 0                 |
| China  | 24,155                      | 3,330,668                             | 2,286,677                | 49,094   | 57,577                               | 19,021      | 14,346            |
| Hong Kong  | 13,625                      | 3,235,667                             | 2,371,315                | 71,939   | 135,915                              | 9,111       | 7,542             |
| India  | 7,771                       | 859,029                               | 658,502                  | 19,343   | * 12,651                             | 2,562       | 2,346             |
| Indonesia  | 1,905                       | 223,419                               | 157,220                  | * 11,815   | 0                                    | 1,892       | * 1,845           |
| Iraq   | 3,332                       | 395,274                               | 342,797                  | **   | 0                                    | 0           | 0                 |
| Israel   | 15,204                      | 987,833                               | 781,656                  | 51,332   | * 7,217                              | * 1,564     | 0                 |
| Japan  | 21,460                      | 1,882,953                             | 1,243,562                | 58,078   | 54,651                               | 6,718       | 3,120             |
| Kuwait   | 4,107                       | 454,979                               | 418,762                  | **   | 0                                    | * 156       | **                |
| Lebanon  | 2,676                       | 214,573                               | 168,073                  | 19,740   | * 2,271                              | 0           | 0                 |
| Malaysia   | 1,017                       | 211,164                               | 117,810                  | * 7,948  | **                                   | 2,061       | * 970             |
| Philippines  | 2,107                       | 237,251                               | 175,468                  | 10,920   | 0                                    | * 1,048     | * 933             |
| Qatar  | 4,148                       | 629,569                               | 434,310                  | 19,574   | 0                                    | 16,313      | 15,640            |
| Saudi Arabia   | 9,708                       | 1,635,633                             | 1,353,919                | * 9,921  | * 11,221                             | 5,318       | 4,488             |
| Singapore  | 8,390                       | 2,066,358                             | 1,413,292                | 21,848   | 35,327                               | 11,076      | 6,132             |
| South Korea  | 16,042                      | 1,367,798                             | 1,081,394                | 34,577   | * 7,540                              | 11,027      | 10,540            |
| Taiwan   | 7,103                       | 629,269                               | 494,915                  | * 3,391  | * 5,753                              | * 29        | 0                 |
| Thailand   | 4,761                       | 444,143                               | 282,521                  | 31,687   | **                                   | 1,673       | * 779             |
| United Arab Emirates   | 13,898                      | 2,122,551                             | 1,595,657                | 30,305   | 31,319                               | 39,632      | 28,861            |
| Other Asian countries  | 11,395                      | 1,070,636                             | 783,786                  | ** 57,094  | ** 8,968                             | 8,188       | ** 7,744          |
| Oceania, total   | 17,489                      | 1,754,068                             | 1,298,476                | 54,377   | * 16,850                             | 1,812       | * 1,297           |
| Australia  | 11,978                      | 1,327,696                             | 996,092                  | 46,163   | * 16,850                             | ** 1,812    | ** 1,297          |
| New Zealand  | 4,554                       | 358,408                               | 259,234                  | ** 8,215   | 0                                    | **          | 0                 |
| Other Oceania countries  | 958                         | 67,964                                | 43,150                   | **   | 0                                    | **          | **                |
| All other countries [3]  | 64,644                      | 5,567,686                             | 4,292,146                | 255,062  | 86,966                               | 32,115      | 21,092            |

Footnotes at end of table.

Table 2. Individual Income Tax Returns With Form 2555: Foreign-Earned Income, Exclusion before Deductions, Housing Exclusion, and Housing Deduction, by Country or Region, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                          |  | Foreign-ear     | ned income        |  |  |   |                        |                      |
|--|--------------------------|--|-----------------|-------------------|--|--|---|------------------------|----------------------|
|  | Tota                     | al allowances, r<br>expenses paid  |                 | s, or             |  |  |   |                        |                      |
| Country or region                        | Total                    | Total cost of living and overseas differential, family, education and home leave | Quarters        | Other             | Less:<br>meals<br>and<br>lodging<br>excluded | Other<br>foreign-<br>earned<br>income<br>(less loss) | Foreign-<br>earned<br>income<br>exclusion<br>before<br>deductions | Housing<br>exclusion   | Housing<br>deduction |
|  | (8)                      | (9)  | (10)            | (11)              | (12)   | (13)   | (14)  | (15)                   | (16)                 |
| All geographic areas                     | 5,228,113                | 466,785  | 671,864         | 4,089,465         | 61,591                                       | 690,497  | 29,557,323  | 1,341,816              | 78,285               |
| North America, total                     | 115,084                  | 9,512  | 14,251          | 91,322            | ** 1,454                                     | 11,544   | 2,669,720   | 17,158                 | 1,119                |
| Canada                                   | 50,880                   | 2,207  | 3,704           | 44,968            | ** 1,454                                     | 8,095  | ** 2,289,517  | 7,306                  | * 225                |
| Greenland                                | 0                        | 0  | 0               | 0                 | **   | 0  | **  | 0                      | 0                    |
| Mexico                                   | 64,204                   | 7,303  | 10,547          | 46,354            | 0  | 3,450  | 380,203   | 9,851                  | * 894                |
| Latin and South America, total           | 147,937                  | 12,941   | 22,123          | 112,873           | * 898  | 25,616   | 863,663   | 22,666                 | 1,863                |
| Argentina                                | 8,830                    | * 51   | * 1,096         | 7,683             | 0  | **   | 46,166  | 1,069                  | **                   |
| Brazil                                   | 70,293                   | 7,515  | 7,873           | 54,906            | * 334  | 8,279  | 195,447   | 9,850                  | 853                  |
| Chile                                    | 7,098                    | 487  | * 869           | 5,742             | **   | **   | 91,622  | 2,468                  | * 53                 |
| Colombia                                 | 12,591                   | * 462  | * 1,306         | 10,821            | 0  | * 3,188  | 123,244   | 2,224                  | **                   |
| Costa Rica                               | 9,431                    | **   | **              | * 7,972           | 0  |  | 111,400   | 827                    | **                   |
| Panama                                   | 10,726                   | * 797  | * 2,870         | 7,059             | 0  | * 3,166  | 61,546  | 1,493                  | **                   |
| Peru                                     | 12,643                   | * 1,673  | * 1,863         | 9,107             | 0  | * 1,293  | 76,226  | 2,343                  | * 510                |
| Venezuela                                | 8,751                    | * 389  | * 2,094         | 6,268             | 0<br>** 564                                  | ** 0 600   | 20,158  | 1,427                  | 0<br>** 447          |
| Other Latin and South American countries | 7,572                    | ** 1,566   | ** 4,150        | * 3,314           | **   | ** 9,689   | 137,854   | 966                    |                      |
| Caribbean, total                         | <b>64,208</b><br>* 2,453 | 9,261  | 17,168          | 37,779<br>**      | 0  | 10,084   | 505,231   | <b>37,055</b><br>1,952 | 2,326                |
| Bahamas Bermuda                          | 38,299                   | 1,011  | 12,772          | 24,515            | **   | 5,359  | 67,336<br>96,555  | 24,325                 | * 839                |
| Cayman Islands                           | * 7,255                  | * 5,391  | 12,772          | 24,515            | 0  | ** 4,726   | 139,631   | 4,652                  | **                   |
| Dominican Republic                       | * 2,311                  | 3,391  | **              | * 1,209           | 0  | **   | 66,055  | * 1,064                | **                   |
| Jamaica                                  | 2,511                    | **   | **              | 1,209             | 0  | 0  | 10,713  | * 149                  | 0                    |
| Other Caribbean countries                | ** 13,891                | ** 2,861   | ** 4,395        | ** 12,055         | 0  | **   | 124,941   | 4,913                  | ** 1,488             |
| Europe, total                            | 1,302,495                | 83,436   | 75,037          | 1,144,022         | 4,270  | 163,466  | 7,592,921   | 284,029                | 18,985               |
| Austria                                  | * 2,570                  | **   | **              | * 1,989           | 0  | **   | 124,152   | 3,086                  | **                   |
| Belgium                                  | 41,502                   | 2,482  | 3,217           | 35,803            | 0  | * 1,604  | 116,733   | 4,266                  | * 8                  |
| Czech Republic                           | 13,303                   | * 2,641  | * 1,111         | * 9,550           | 0  | **   | 104,552   | 1,184                  | **                   |
| Denmark                                  | * 5,595                  | ** 1,510   | **              | * 3,541           | 0  | **   | 88,251  | 2,565                  | **                   |
| Finland                                  | **                       | 0  | 0               | **                | 0  | **   | 41,949  | * 304                  | **                   |
| France                                   | 84,743                   | 9,823  | 5,048           | 69,873            | 0  | 1,135  | 730,887   | 24,214                 | 1,625                |
| Germany                                  | 111,869                  | 5,956  | 4,157           | 101,756           | **   | 4,016  | 1,207,540   | 22,932                 | 1,360                |
| Greece                                   | 0                        | 0  | 0               | 0                 | 0  | * 10,868   | 82,768  | * 223                  | 0                    |
| Hungary                                  | * 2,727                  | * 21   | 0               | * 2,705           | 0  | 0  | 20,934  | * 1,256                | C                    |
| Ireland                                  | 16,257                   | * 600  | * 451           | 15,205            | 0  | * 7,449  | 62,963  | 2,056                  | **                   |
| Italy                                    | 76,376                   | 7,528  | 4,283           | 64,564            | **   | * 467  | 309,723   | 8,851                  | * 217                |
| Luxembourg                               | 10,934                   | * 303  | * 998           | 9,632             | 0  |  | 28,581  | 961                    | **                   |
| Netherlands                              | 115,708                  | 9,467  | 5,856           | 100,385           | 0  | * 10,884   | 428,077   | 16,416                 | * 211                |
| Norway                                   | 16,397                   | * 656  | * 423           | 15,318            | 0  | **   | 114,800   | 896                    | C                    |
| Poland                                   | 7,003                    | * 645  | * 466           | 5,891             | 0  |  | 57,486  | 431                    | **                   |
| Russia                                   | 38,990                   | 2,738  | 5,383           | 30,870            |  | * 210  | 96,602  | 18,427                 | * 855                |
| Spain                                    | 13,910                   | **   | **              | 13,455            | 0  | * 2,369  | 154,256   | 2,668                  | * 385                |
| Sweden                                   | * 3,001                  | * 275  | * 288<br>10 288 | * 2,438           | * 1 503                                      | 20 720   | 196,075   | 368<br>67 550          |                      |
| Switzerland Turkey                       | 198,257<br>20,323        | 20,183<br>** 2,298   | 10,288          | 167,786<br>17,974 | * 1,503<br>**                                | 28,728<br>* 6,451                                    | 1,031,511<br>146,745  | 67,559<br>1,452        | 1,788                |
| United Kingdom                           | 499,924                  | 14,079   | 25,787          | 460,058           | 0  | 79,033   | 2,248,703   | 1,452                  | 11,135               |
| Other European countries                 | ** 23,110                | 2,231  | ** 7,281        | ** 15,228         | ** 2,768                                     | ** 7,563   | 199,632   | 3,331                  | ** 1,402             |
| Africa, total                            | 251,368                  | 24,075   | 24,404          | 202,888           | 2,700  | 17,167   | 1,003,901   | 22,356                 | 1,151                |
| Angola                                   | 56,350                   | 3,763  | 9,957           | 42,629            | 2,730  | **   | 33,594  | 4,046                  | **                   |
| Egypt                                    | 24,705                   | * 1,427  | * 1,674         | 21,605            | 0  | * 4,040  | 91,008  | 3,200                  | **                   |
| Kenya                                    | 13,325                   | 3,866  | * 1,192         | 8,266             | 0  | * 409  | 94,665  | 1,258                  | **                   |
| Morocco                                  | 10,501                   | * 747  | * 1,083         | 8,671             | **   | 0  | 26,969  | * 476                  | C                    |
|  | 68,967                   | 5,964  | 6,824           | 56,179            | * 655  | * 7,424  | 109,164   | 3,674                  | C                    |
| Nigeria                                  |                          |  |                 |                   |  |  |   |                        |                      |
| South Africa                             | 33,007                   | 2,481  | * 651           | 29,875            | 0  | * 682  | 127,489   | 2,339                  | **                   |

Table 2. Individual Income Tax Returns With Form 2555: Foreign-Earned Income, Exclusion before Deductions, Housing Exclusion, and Housing Deduction, by Country or Region, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|                         |           |  | Foreign-ear  | ned income |  |  |   |                      |                      |
|-------------------------|-----------|--|--------------|------------|--|--|---|----------------------|----------------------|
|                         | Tot       | al allowances, r   |              | , or       |  |  |   |                      |                      |
|                         |           | expenses paid  | by employers |            |  |  | Foreign-  |                      |                      |
| Country or region       | Total     | Total cost of<br>living and<br>overseas<br>differential,<br>family,<br>education and<br>home leave | Quarters     | Other      | Less:<br>meals<br>and<br>lodging<br>excluded | Other<br>foreign-<br>earned<br>income<br>(less loss) | earned<br>income<br>exclusion<br>before<br>deductions | Housing<br>exclusion | Housing<br>deduction |
|                         | (8)       | (9)  | (10)         | (11)       | (12)   | (13)   | (14)  | (15)                 | (16)                 |
| Asia, total             | 3,072,077 | 294,324  | 481,259      | 2,296,495  | 45,843                                       | 354,210  | 12,028,753  | 869,108              | 43,691               |
| Afghanistan             | * 5,735   | **   | **           | * 5,598    | **   | 0  | 602,705   | 824                  | * 202                |
| China                   | 632,776   | 61,613   | 74,696       | 496,468    | 4,502  | 55,982   | 1,538,087   | 114,045              | 4,395                |
| Hong Kong               | 388,007   | 29,941   | 93,508       | 264,559    | **   | 152,469  | 1,132,709   | 249,618              | 14,201               |
| India                   | 105,131   | 3,665  | 7,787        | 93,679     | * 60   | 12,631   | 497,034   | 8,025                | 1,804                |
| Indonesia               | 45,216    | 3,781  | 5,062        | 36,373     | * 537  | **   | 117,018   | 4,975                | **                   |
| Iraq                    | 15,928    | 0  | **           | **         | 0  | 0  | 274,885   | * 352                | 0                    |
| Israel                  | 11,480    | * 581  | * 761        | 10,138     | 0  | 2,169  | 788,388   | 2,538                | * 851                |
| Japan                   | 293,055   | 24,167   | 41,136       | 227,753    | **   | 21,771   | 1,106,441   | 54,031               | 4,414                |
| Kuwait                  | 13,561    | * 1,006  | * 4,111      | 8,444      | 0  | 0  | 347,560   | 24,052               | **                   |
| Lebanon                 | * 2,687   | **   | **           | * 2,161    | 0  | **   | 172,117   | 1,574                | **                   |
| Malaysia                | 63,130    | 3,509  | 5,616        | 54,006     | 0  | * 9,809  | 81,775  | 6,623                | **                   |
| Philippines             | 41,789    | 3,076  | 4,304        | 34,409     | **   | * 1,955  | 118,818   | 3,722                | * 51                 |
| Qatar                   | 126,737   | 17,356   | 36,679       | 72,702     | * 6,357                                      | * 3,890  | 364,564   | 33,162               | 919                  |
| Saudi Arabia            | 195,853   | 22,056   | 18,762       | 155,034    | 17,613                                       | 14,091   | 819,735   | 25,692               | * 993                |
| Singapore               | 515,186   | 51,679   | 73,939       | 389,569    | * 1,726                                      | 27,417   | 732,228   | 144,237              | 3,812                |
| South Korea             | 102,389   | 14,478   | 13,153       | 74,759     | * 3,956                                      | 8,528  | 846,833   | 29,065               | 961                  |
| Taiwan                  | 35,015    | 3,891  | 3,499        | 27,625     | **   | 4,171  | 393,743   | 7,461                | * 205                |
| Thailand                | 85,000    | 7,156  | 11,000       | 66,843     | **   | * 180  | 244,619   | 10,124               | * 216                |
| United Arab Emirates    | 299,598   | 39,726   | 79,525       | 180,347    | * 5,839                                      | 17,191   | 1,169,369   | 134,740              | 8,228                |
| Other Asian countries   | 93,803    | ** 6,648   | ** 7,722     | ** 96,026  | ** 5,253                                     | ** 21,957  | 680,125   | 14,248               | ** 2,441             |
| Oceania, total          | 177,449   | 15,881   | 24,472       | 137,096    | 0  | 24,834   | 1,120,308   | 24,702               | * 488                |
| Australia               | 171,438   | 14,700   | 23,105       | 133,633    | 0  | 17,606   | 768,588   | 23,088               | ** 488               |
| New Zealand             | ** 6,012  | * 1,181  | * 1,367      | ** 3,463   | 0  | * 7,228  | 290,376   | 1,614                | **                   |
| Other Oceania countries | **        | 0  | 0            | **         | 0  | 0  | 61,343  | 0                    | 0                    |
| All other countries [3] | 97,496    | 17,356   | 13,150       | 66,990     | 6,336  | 83,576   | 3,772,827   | 64,742               | 8,661                |

<sup>\*</sup> Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>\*\*</sup> Data combined to prevent disclosure of specific taxpayer information.

<sup>[1]</sup> Includes returns with no foreign-earned income, but filed Form 2555 to claim an exclusion for a prior year or for reporting purposes.

<sup>[2]</sup> Includes meals, car, and other property or facilities not shown separately.

<sup>[3]</sup> Includes returns with no country stated and U.S. Possessions.

NOTE: Detail may not add to totals because of rounding. Data are from Forms 2555, Foreign Earned Income, filed by U.S. taxpayers with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income, Individual Foreign-Earned Income, October 2019.

Table 3. Individual Income Tax Returns With a Foreign Tax Credit or a Form 1116: Sources of Income, Deductions and Tax Items, and Foreign Income, Taxes, and Credit, by Size of Adjusted Gross Income, Tax Year 2016 [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                             | Sele                        | cted income, excl       | usion, deduction, | and credit items r | eported on Form                        | 1040       |  |
|--|-----------------------------|-----------------------------|-------------------------|-------------------|--------------------|--|------------|--|
| Size of<br>adjusted<br>gross income          | Number<br>of<br>returns [1] | Adjusted<br>gross<br>income | Worldwide<br>income [2] | Salaries a        | nd wages           | Foreign-earned income<br>exclusion [3] |            |  |
|  |                             | or deficit                  |                         | Number of returns | Amount             | Number of returns                      | Amount     |  |
|  | (1)                         | (2)                         | (3)                     | (4)               | (5)                | (6)                                    | (7)        |  |
| All returns                                  | 9,250,150                   | 2,376,331,831               | 2,432,604,066           | 5,910,296         | 1,086,789,197      | 167,206                                | 12,564,633 |  |
| No adjusted gross income (includes deficits) | 160,481                     | -74,955,014                 | -73,773,368             | 55,006            | 3,904,006          | 13,735                                 | 740,836    |  |
| \$1 under \$10,000                           | 319,464                     | 1,469,461                   | 3,181,684               | 116,522           | 2,050,770          | 29,603                                 | 1,586,165  |  |
| \$10,000 under \$25,000                      | 520,557                     | 9,112,730                   | 10,635,328              | 209,211           | 3,884,161          | 17,387                                 | 1,158,927  |  |
| \$25,000 under \$50,000                      | 990,070                     | 37,380,380                  | 39,900,676              | 496,587           | 15,656,726         | 20,454                                 | 1,539,998  |  |
| \$50,000 under \$75,000                      | 1,165,189                   | 72,556,107                  | 75,145,238              | 610,786           | 28,307,788         | 14,637                                 | 1,159,888  |  |
| \$75,000 under \$100,000                     | 1,097,925                   | 95,967,993                  | 98,869,046              | 639,577           | 41,422,659         | 11,493                                 | 956,700    |  |
| \$100,000 under \$200,000                    | 2,566,060                   | 362,184,461                 | 371,370,142             | 1,763,470         | 188,261,395        | 23,029                                 | 2,020,381  |  |
| \$200,000 under \$500,000                    | 1,674,851                   | 502,696,418                 | 515,761,126             | 1,387,229         | 310,666,072        | 23,854                                 | 2,158,199  |  |
| \$500,000 under \$1,000,000                  | 466,744                     | 318,428,135                 | 326,447,304             | 394,936           | 178,319,571        | 8,238                                  | 786,290    |  |
| \$1,000,000 under \$1,500,000                | 120,364                     | 145,442,529                 | 148,805,687             | 99,284            | 69,157,690         | 2,097                                  | 202,679    |  |
| \$1,500,000 under \$2,000,000                | 52,560                      | 90,413,027                  | 92,263,843              | 43,055            | 38,206,736         | 959                                    | 90,605     |  |
| \$2,000,000 under \$5,000,000                | 80,897                      | 242,078,021                 | 245,916,695             | 66,099            | 88,197,345         | 1,291                                  | 123,206    |  |
| \$5,000,000 under \$10,000,000               | 21,221                      | 145,423,907                 | 147,028,031             | 17,286            | 44,765,110         | 278                                    | 26,320     |  |
| \$10,000,000 or more                         | 13,770                      | 428,133,674                 | 431,052,632             | 11,249            | 73,989,167         | 151                                    | 14,441     |  |

Table 3. Individual Income Tax Returns With a Foreign Tax Credit or a Form 1116: Sources of Income, Deductions and Tax Items, and Foreign Income, Taxes, and Credit, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                   | Selected      | d income, exclu   | sion, deduction, | and credit items  | reported on Fo | orm 1040          |             |  |
|--|-------------------|---------------|-------------------|------------------|-------------------|----------------|-------------------|-------------|--|
| Size of<br>adjusted<br>gross income          | Foreign hous      | ing deduction | Taxable           | income           | Foreign t         | ax credit      | Total income tax  |             |  |
|  | Number of returns | Amount        | Number of returns | Amount           | Number of returns | Amount         | Number of returns | Amount      |  |
|  | (8)               | (9)           | (10)              | (11)             | (12)              | (13)           | (14)              | (15)        |  |
| All returns                                  | 2,356             | 54,546        | 8,616,783         | 2,003,843,215    | 7,798,024         | 20,090,001     | 8,126,439         | 518,772,397 |  |
| No adjusted gross income (includes deficits) | * 37              | * 185         | 0                 | 0                | 332               | 35             | 2,356             | 69,039      |  |
| \$1 under \$10,000                           | **                | **            | 106,373           | 257,228          | 72,382            | 3,192          | 75,059            | 23,374      |  |
| \$10,000 under \$25,000                      | ** 120            | ** 730        | 349,431           | 2,345,555        | 274,460           | 27,215         | 239,655           | 160,115     |  |
| \$25,000 under \$50,000                      | 226               | 1,331         | 942,072           | 19,058,071       | 812,608           | 167,777        | 772,405           | 1,645,558   |  |
| \$50,000 under \$75,000                      | 205               | 2,540         | 1,145,593         | 47,090,804       | 1,034,661         | 255,845        | 1,066,973         | 5,533,701   |  |
| \$75,000 under \$100,000                     | 167               | 2,096         | 1,092,728         | 67,545,380       | 1,007,851         | 367,103        | 1,044,290         | 8,712,964   |  |
| \$100,000 under \$200,000                    | 400               | 7,998         | 2,557,612         | 274,285,494      | 2,357,295         | 1,385,943      | 2,504,132         | 44,339,814  |  |
| \$200,000 under \$500,000                    | 405               | 6,786         | 1,669,043         | 412,561,928      | 1,542,534         | 3,418,553      | 1,667,181         | 96,267,365  |  |
| \$500,000 under \$1,000,000                  | 335               | 13,247        | 465,916           | 278,253,059      | 429,450           | 3,152,218      | 465,875           | 79,998,669  |  |
| \$1,000,000 under \$1,500,000                | 161               | 6,567         | 120,050           | 127,302,877      | 110,769           | 1,761,571      | 120,239           | 39,745,037  |  |
| \$1,500,000 under \$2,000,000                | 120               | 5,562         | 52,442            | 79,454,601       | 48,209            | 996,525        | 52,503            | 25,576,294  |  |
| \$2,000,000 under \$5,000,000                | 124               | 5,238         | 80,614            | 211,909,461      | 74,993            | 2,890,724      | 80,809            | 69,165,803  |  |
| \$5,000,000 under \$10,000,000               | 31                | 1,310         | 21,176            | 127,062,052      | 19,719            | 1,502,161      | 21,203            | 41,138,929  |  |
| \$10,000,000 or more                         | 23                | 955           | 13,732            | 356,716,706      | 12,761            | 4,161,139      | 13,760            | 106,395,734 |  |

Table 3. Individual Income Tax Returns With a Foreign Tax Credit or a Form 1116: Sources of Income, Deductions and Tax Items, and Foreign Income, Taxes, and Credit, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                          |                   | Retu         | urns with a Form 1     | 116               |  |             |  |
|--|--------------------------|-------------------|--------------|------------------------|-------------------|--|-------------|--|
|  |                          |                   | Foreign in   | come, taxes and c      | redit reported on | Form 1116  |             |  |
| Size of<br>adjusted<br>gross income          | Number of returns with a | Foreign-source    | gross income | Foreign-source<br>loss |                   | Foreign-source taxable income before adjustments [4] |             |  |
|  | Form 1116                | Number of returns | Amount       | Number of returns      | Amount            | Number<br>of returns                                 | Amount      |  |
|  | (16)                     | (17)              | (18)         | (19)                   | (20)              | (21)   | (22)        |  |
| All returns                                  | 4,989,329                | 4,555,160         | 216,699,618  | 4,379,947              | 89,107,527        | 4,571,835  | 127,592,091 |  |
| No adjusted gross income (includes deficits) | 160,202                  | 118,962           | 6,535,761    | 112,319                | 5,406,474         | 125,305  | 1,129,287   |  |
| \$1 under \$10,000                           | 280,885                  | 231,167           | 671,049      | 232,821                | 521,997           | 233,168  | 149,052     |  |
| \$10,000 under \$25,000                      | 347,396                  | 300,263           | 1,471,184    | 287,506                | 634,978           | 300,844  | 836,207     |  |
| \$25,000 under \$50,000                      | 505,873                  | 456,069           | 3,707,291    | 442,069                | 1,101,013         | 457,845  | 2,606,277   |  |
| \$50,000 under \$75,000                      | 549,582                  | 498,687           | 3,738,492    | 486,391                | 763,597           | 500,020  | 2,974,895   |  |
| \$75,000 under \$100,000                     | 482,095                  | 451,377           | 4,584,069    | 433,577                | 1,047,525         | 451,572  | 3,536,545   |  |
| \$100,000 under \$200,000                    | 1,189,671                | 1,096,163         | 12,904,814   | 1,048,714              | 2,520,066         | 1,098,852  | 10,384,748  |  |
| \$200,000 under \$500,000                    | 924,309                  | 873,209           | 26,531,598   | 825,737                | 4,599,421         | 874,694  | 21,932,178  |  |
| \$500,000 under \$1,000,000                  | 315,333                  | 301,450           | 21,117,978   | 289,222                | 5,714,030         | 301,513  | 15,403,948  |  |
| \$1,000,000 under \$1,500,000                | 92,309                   | 89,465            | 11,966,934   | 86,773                 | 4,071,026         | 89,515   | 7,895,908   |  |
| \$1,500,000 under \$2,000,000                | 41,915                   | 40,718            | 7,783,229    | 39,470                 | 2,797,018         | 40,749   | 4,986,210   |  |
| \$2,000,000 under \$5,000,000                | 67,923                   | 66,376            | 24,407,868   | 64,797                 | 10,367,355        | 66,469   | 14,040,513  |  |
| \$5,000,000 under \$10,000,000               | 18,930                   | 18,558            | 14,343,047   | 18,128                 | 6,395,428         | 18,579   | 7,947,619   |  |
| \$10,000,000 or more                         | 12,906                   | 12,695            | 76,936,304   | 12,422                 | 43,167,599        | 12,712   | 33,768,705  |  |

Table 3. Individual Income Tax Returns With a Foreign Tax Credit or a Form 1116: Sources of Income, Deductions and Tax Items, and Foreign Income, Taxes, and Credit, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                                   |            |                   |              | Returns with      | a Form 1116    |                   |         |                   |            |  |  |
|--|-----------------------------------|------------|-------------------|--------------|-------------------|----------------|-------------------|---------|-------------------|------------|--|--|
|  |                                   |            | F                 | oreign incom | e, taxes and c    | redit reported | on Form 111       | 6       |                   |            |  |  |
| Size of                                      | Foreign taxes paid or accrued on: |            |                   |              |                   |                |                   |         |                   |            |  |  |
| adjusted<br>gross income                     | То                                | tal        | Divid             | ends         | Rents and         | l royalties    | Inte              | rest    | Other i           | ncome      |  |  |
|  | Number of returns                 | Amount     | Number of returns | Amount       | Number of returns | Amount         | Number of returns | Amount  | Number of returns | Amount     |  |  |
|  | (23)                              | (24)       | (25)              | (26)         | (27)              | (28)           | (29)              | (30)    | (31)              | (32)       |  |  |
| All returns                                  | 4,179,809                         | 27,037,624 | 3,612,870         | 2,437,611    | 37,423            | 335,782        | 118,661           | 269,903 | 853,966           | 23,994,329 |  |  |
| No adjusted gross income (includes deficits) | 103,821                           | 330,659    | 87,202            | 50,976       | 1,076             | 52,528         | 3,680             | 2,515   | 22,026            | 224,641    |  |  |
| \$1 under \$10,000                           | 194,622                           | 198,235    | 164,978           | 10,450       | 606               | 1,093          | 10,599            | 3,016   | 29,395            | 183,677    |  |  |
| \$10,000 under \$25,000                      | 252,052                           | 275,863    | 210,647           | 32,182       | 366               | 400            | 10,694            | 4,050   | 46,898            | 239,231    |  |  |
| \$25,000 under \$50,000                      | 413,367                           | 551,380    | 339,842           | 56,787       | 2,971             | 3,872          | 8,096             | 11,695  | 85,833            | 479,026    |  |  |
| \$50,000 under \$75,000                      | 464,651                           | 545,178    | 406,280           | 76,249       | 2,299             | 4,423          | 4,327             | 3,128   | 73,936            | 461,378    |  |  |
| \$75,000 under \$100,000                     | 422,879                           | 709,339    | 375,123           | 99,507       | 5,295             | 11,838         | 8,667             | 13,558  | 64,736            | 584,436    |  |  |
| \$100,000 under \$200,000                    | 1,009,461                         | 2,377,120  | 893,510           | 226,372      | 6,259             | 15,630         | 27,150            | 99,201  | 160,273           | 2,035,916  |  |  |
| \$200,000 under \$500,000                    | 811,547                           | 4,891,433  | 700,503           | 453,051      | 12,587            | 117,692        | 30,208            | 56,887  | 181,798           | 4,263,804  |  |  |
| \$500,000 under \$1,000,000                  | 287,243                           | 3,921,420  | 246,790           | 287,501      | 3,387             | 66,852         | 8,850             | 16,460  | 88,226            | 3,550,606  |  |  |
| \$1,000,000 under \$1,500,000                | 85,776                            | 2,062,079  | 73,869            | 170,318      | 930               | 5,245          | 2,113             | 6,020   | 32,622            | 1,880,495  |  |  |
| \$1,500,000 under \$2,000,000                | 39,135                            | 1,141,089  | 33,647            | 90,441       | 407               | 5,395          | 1,110             | 3,529   | 17,183            | 1,041,724  |  |  |
| \$2,000,000 under \$5,000,000                | 64,597                            | 3,278,534  | 54,785            | 296,210      | 834               | 18,127         | 2,069             | 10,297  | 32,116            | 2,953,900  |  |  |
| \$5,000,000 under \$10,000,000               | 18,195                            | 1,677,038  | 15,486            | 160,958      | 224               | 12,806         | 637               | 13,599  | 10,552            | 1,489,675  |  |  |
| \$10,000,000 or more                         | 12,464                            | 5,078,257  | 10,208            | 426,607      | 182               | 19,881         | 461               | 25,948  | 8,371             | 4,605,821  |  |  |

Table 3. Individual Income Tax Returns With a Foreign Tax Credit or a Form 1116: Sources of Income, Deductions and Tax Items, and Foreign Income, Taxes, and Credit, by Size of Adjusted Gross Income, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|  |                                    |            |                   | -                     |                   |                            |                   |               |  |            |
|--|------------------------------------|------------|-------------------|-----------------------|-------------------|----------------------------|-------------------|---------------|--|------------|
|  |                                    |            |                   |                       | Returns with      | a Form 1116                |                   |               |  |            |
|  |                                    |            | F                 | Foreign incom         | e, taxes and o    | redit reported             | on Form 111       | 6             |  |            |
| Size of<br>adjusted<br>gross income          | Foreign taxes available for credit |            | Foreign tax       | Foreign tax carryover |                   | Reduction in foreign taxes |                   | gn tax credit | Foreign tax credit after adjustments [5] |            |
|  | Number of returns                  | Amount     | Number of returns | Amount                | Number of returns | Amount                     | Number of returns | Amount        | Number of returns                        | Amount     |
|  | (33)                               | (34)       | (35)              | (36)                  | (37)              | (38)                       | (39)              | (40)          | (41)                                     | (42)       |
| All returns                                  | 4,669,145                          | 47,335,683 | 1,848,890         | 22,360,853            | 107,173           | 2,091,587                  | 3,536,520         | 19,813,843    | 3,537,203                                | 19,793,354 |
| No adjusted gross income (includes deficits) | 147,904                            | 1,697,701  | 115,899           | 1,427,591             | 5,674             | 65,490                     | 53                | 6             | 53                                       | 6          |
| \$1 under \$10,000                           | 262,635                            | 424,347    | 182,712           | 371,539               | 13,708            | 145,419                    | 33,803            | 1,871         | 33,803                                   | 1,870      |
| \$10,000 under \$25,000                      | 317,734                            | 615,152    | 203,188           | 455,187               | 7,902             | 115,899                    | 101,299           | 21,718        | 101,299                                  | 21,502     |
| \$25,000 under \$50,000                      | 476,520                            | 1,263,265  | 241,695           | 897,284               | 10,901            | 187,684                    | 328,412           | 150,952       | 328,411                                  | 148,354    |
| \$50,000 under \$75,000                      | 508,359                            | 1,136,483  | 200,974           | 768,282               | 11,633            | 177,749                    | 419,055           | 229,723       | 419,055                                  | 227,950    |
| \$75,000 under \$100,000                     | 453,900                            | 1,396,737  | 156,906           | 829,891               | 6,691             | 142,555                    | 391,719           | 332,023       | 392,020                                  | 331,420    |
| \$100,000 under \$200,000                    | 1,106,997                          | 3,836,845  | 364,984           | 1,825,052             | 17,074            | 366,117                    | 980,902           | 1,297,044     | 980,906                                  | 1,290,759  |
| \$200,000 under \$500,000                    | 867,764                            | 8,878,062  | 251,028           | 4,471,105             | 19,368            | 489,365                    | 791,959           | 3,350,257     | 791,992                                  | 3,345,915  |
| \$500,000 under \$1,000,000                  | 301,077                            | 7,077,633  | 77,526            | 3,375,320             | 7,513             | 219,644                    | 277,820           | 3,132,825     | 278,040                                  | 3,131,682  |
| \$1,000,000 under \$1,500,000                | 88,487                             | 3,392,508  | 20,974            | 1,389,705             | 2,279             | 64,181                     | 82,634            | 1,754,944     | 82,714                                   | 1,753,331  |
| \$1,500,000 under \$2,000,000                | 40,329                             | 1,903,342  | 9,730             | 790,406               | 1,147             | 28,256                     | 37,549            | 995,033       | 37,565                                   | 994,420    |
| \$2,000,000 under \$5,000,000                | 66,197                             | 5,421,141  | 15,825            | 2,185,208             | 2,031             | 50,100                     | 62,000            | 2,888,750     | 62,019                                   | 2,888,402  |
| \$5,000,000 under \$10,000,000               | 18,556                             | 2,824,058  | 4,301             | 1,156,852             | 653               | 10,159                     | 17,424            | 1,501,803     | 17,429                                   | 1,501,418  |
| \$10,000,000 or more                         | 12,685                             | 7,468,409  | 3,148             | 2,417,432             | 598               | 28,970                     | 11,893            | 4,156,894     | 11,897                                   | 4,156,323  |

<sup>\*</sup> Estimate should be used with caution because of the small number of sample returns on which it is based.

<sup>\*\*</sup> Data combined to prevent disclosure of taxpayer information.

<sup>[1]</sup> Not all taxpayers with a foreign tax credit file the Form 1116, Foreign Tax Credit. Taxpayers with \$300 (\$600 if married filing a joint return) or less in creditable foreign taxes who also meet certain other conditions are not required to file Form 1116 to claim the foreign tax credit.

<sup>[2]</sup> Worldwide income is total income or loss reported on Form 1040, U.S. Individual Income Tax Return, before the foreign-earned income and housing exclusions have been taken.

<sup>[3]</sup> Amount reported on Form 1040 is the total amount of foreign-earned income exclusion after subtracting deductions allocable to excluded income.

<sup>[4]</sup> Adjustments include allocation of foreign and U.S. losses, recapture of prior-year foreign losses, and recharacterization of income.

<sup>[5]</sup> Adjustments include reductions for participation in unsanctioned international boycotts and increases permitted by tax treaties between the United States and certain foreign countries.

NOTES: Detail may not add to totals because of rounding. Data are from Forms 1116, Foreign Tax Credit, which U.S. taxpayers file with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

Table 4. Individual Income Tax Returns With Form 1116: Foreign-Source Income, Deductions, and Taxes, by **Country or Region, Tax Year 2016**[All figures are estimates based on samples—money amounts are in thousands of dollars]

|                                      |                   | Foreign                               | Foreign  | Foreign-<br>source                                |            | Foreign t | axes paid or acc    | crued on: | on:          |  |  |  |  |  |
|--------------------------------------|-------------------|---------------------------------------|--|---|------------|-----------|---------------------|-----------|--------------|--|--|--|--|--|
| Country or region                    | Number of returns | Foreign-<br>source<br>gross<br>income | Foreign-<br>source<br>deductions<br>and losses | taxable<br>income<br>before<br>adjustments<br>[1] | Total      | Dividends | Rents and royalties | Interest  | Other income |  |  |  |  |  |
|                                      | (1)               | (2)                                   | (3)  | (4)   | (5)        | (6)       | (7)                 | (8)       | (9)          |  |  |  |  |  |
| All geographic areas                 | 4,989,329         | 216,699,618                           | 89,107,527                                     | 127,592,091                                       | 27,037,624 | 2,437,611 | 335,782             | 269,903   | 23,994,329   |  |  |  |  |  |
| North America, total                 | 657,513           | 18,597,685                            | 6,654,576                                      | 11,943,109  | 3,623,510  | 241,629   | 98,398              | 40,155    | 3,243,327    |  |  |  |  |  |
| Canada                               | 597,791           | 13,606,129                            | 4,249,834                                      | 9,356,295   | 2,917,228  | 211,627   | 77,426              | 35,235    | 2,592,941    |  |  |  |  |  |
| Mexico                               | 59,722            | 4,991,555                             | 2,404,741                                      | 2,586,814   | 706,281    | 30,002    | 20,972              | 4,921     | 650,386      |  |  |  |  |  |
| Latin/South America, total           | 49,145            | 3,745,373                             | 1,610,279                                      | 2,135,095   | 555,631    | 15,977    | 3,049               | 23,439    | 513,166      |  |  |  |  |  |
| Argentina                            | 4,660             | 179,115                               | 46,419   | 132,696   | 45,694     | 7,828     | **                  | **        | 37,187       |  |  |  |  |  |
| Brazil                               | 22,895            | 1,278,820                             | 420,030  | 858,790   | 224,904    | 2,622     | 1,106               | 13,563    | 207,613      |  |  |  |  |  |
| Chile                                | 3,033             | 253,359                               | 47,077   | 206,282   | 55,847     | * 2,143   | **                  | **        | 46,420       |  |  |  |  |  |
| Colombia                             | 3,942             | 1,147,253                             | 902,344  | 244,909   | 84,489     | 1,100     | * 138               | 174       | 83,078       |  |  |  |  |  |
| Costa Rica                           | 1,523             | 164,357                               | 57,617   | 106,740   | 17,102     | **        | 0                   | **        | 14,366       |  |  |  |  |  |
| Panama                               | 1,407             | 120,333                               | 11,844   | 108,489   | 11,502     | * 565     | * 454               | 0         | 10,483       |  |  |  |  |  |
| Peru                                 | 1,290             | 164,082                               | 33,895   | 130,187   | 25,773     | * 949     | **                  | **        | 24,353       |  |  |  |  |  |
| Venezuela                            | 5,927             | 169,067                               | 42,217   | 126,849   | 37,672     | **        | 0                   | **        | 37,499       |  |  |  |  |  |
| Other Latin/South American countries | 4,470             | 268,988                               | 48,836   | 220,152   | 52,646     | ** 769    | ** 1,350            | ** 9,702  | 52,166       |  |  |  |  |  |
| Caribbean, total                     | 15,253            | 916,673                               | 341,174  | 575,498   | 57,011     | 634       | * 7,839             | 82        | 48,455       |  |  |  |  |  |
| Bermuda                              | 2,943             | 363,890                               | 27,931   | 335,959   | 5,514      | 22        | 0                   | 0         | 5,492        |  |  |  |  |  |
| Cayman Islands                       | 1,761             | 104,903                               | 35,266   | 69,638  | 204        | * 21      | 0                   | 0         | 183          |  |  |  |  |  |
| Dominican Republic                   | 1,315             | 49,788                                | 55,505   | -5,717  | 10,965     | * 246     | **                  | **        | 10,585       |  |  |  |  |  |
| Jamaica                              | 3,816             | 103,103                               | 31,594   | 71,509  | 19,225     | * 62      | **                  | **        | 11,403       |  |  |  |  |  |
| Other Caribbean countries            | 5,417             | 294,990                               | 190,879  | 104,110   | 21,103     | 282       | ** 7,839            | ** 82     | 20,793       |  |  |  |  |  |
| Europe, total                        | 582,865           | 37,808,585                            | 10,610,459                                     | 27,198,126  | 9,479,654  | 346,489   | 103,135             | 59,984    | 8,970,046    |  |  |  |  |  |
| Austria                              | 4,317             | 130,498                               | 32,882   | 97,616  | 33,270     | 6,799     | **                  | **        | 26,150       |  |  |  |  |  |
| Belgium                              | 21,450            | 1,124,149                             | 190,358  | 933,791   | 351,267    | 23,574    | **                  | **        | 327,526      |  |  |  |  |  |
| Czech Republic                       | 2,699             | 72,862                                | 18,804   | 54,058  | 17,369     | * 3,004   | **                  | **        | 14,112       |  |  |  |  |  |
| Denmark                              | 9,234             | 288,497                               | 42,251   | 246,246   | 94,536     | 3,387     | **                  | **        | 90,621       |  |  |  |  |  |
| Finland                              | 14,890            | 82,270                                | 29,881   | 52,389  | 22,929     | 6,598     | * 15                | * 5       | 16,311       |  |  |  |  |  |
| France                               | 78,946            | 2,265,652                             | 926,786  | 1,338,866   | 378,185    | 19,214    | 25,008              | 3,446     | 330,518      |  |  |  |  |  |
| Germany                              | 76,436            | 6,184,889                             | 2,547,665                                      | 3,637,224   | 1,315,910  | 63,155    | 10,104              | 22,487    | 1,220,164    |  |  |  |  |  |
| Greece                               | 4,258             | 196,454                               | 34,548   | 161,906   | 66,373     | 106       | 3,591               | 13        | 62,662       |  |  |  |  |  |
| Hungary                              | 551               | 108,871                               | 47,795   | 61,076  | 16,967     | * 595     | **                  | **        | 16,352       |  |  |  |  |  |
| Ireland                              | 17,074            | 652,045                               | 133,287  | 518,758   | 144,838    | 2,430     | 998                 | 95        | 141,316      |  |  |  |  |  |
| Italy                                | 11,956            | 804,002                               | 213,465  | 590,537   | 228,327    | 12,138    | 27,244              | 1,794     | 187,152      |  |  |  |  |  |
| Luxembourg                           | 10,692            | 765,079                               | 205,297  | 559,783   | 146,834    | 12,629    | 0                   | * 122     | 134,083      |  |  |  |  |  |
| Netherlands                          | 54,364            | 2,020,586                             | 502,333  | 1,518,253   | 492,252    | 17,767    | **                  | **        | 474,083      |  |  |  |  |  |
| Norway                               | 3,325             | 204,686                               | 46,555   | 158,131   | 55,399     | 2,869     | **                  | **        | 52,520       |  |  |  |  |  |
| Poland                               | 2,925             | 189,190                               | 76,020   | 113,171   | 23,203     | 992       | 3,578               | 296       | 18,337       |  |  |  |  |  |
| Portugal                             | 3,389             | 146,344                               | 34,139   | 112,204   | 38,026     | * 486     | * 132               | 480       | 36,929       |  |  |  |  |  |
| Russia                               | 4,277             | 677,071                               | 95,871   | 581,200   | 112,586    | 6,179     | **                  | **        | 105,240      |  |  |  |  |  |
| Spain                                | 20,336            | 450,383                               | 103,000  | 347,383   | 109,334    | 10,501    | 2,361               | 877       | 95,595       |  |  |  |  |  |
| Sweden                               | 9,297             | 410,436                               | 69,528   | 340,909   | 114,113    | 19,195    | * 25                | 1,036     | 93,858       |  |  |  |  |  |
| Switzerland                          | 48,134            | 3,576,810                             | 625,587  | 2,951,223   | 813,792    | 72,135    | 14,257              | 17,291    | 710,109      |  |  |  |  |  |
| Turkey                               | 3,141             | 423,075                               | 43,235   | 379,840   | 107,271    | 3,234     | 2,864               | 1,660     | 99,513       |  |  |  |  |  |
| United Kingdom                       | 172,194           | 16,696,352                            | 4,532,175                                      | 12,164,177  | 4,753,335  | 53,215    | 10,879              | 8,728     | 4,680,513    |  |  |  |  |  |
| Other European countries             | 8,979             | 338,386                               | 59,001   | 279,386   | 43,541     | 6,290     | ** 2,078            | ** 1,653  | 36,386       |  |  |  |  |  |
| Africa, total                        | 13,343            | 1,583,973                             | 284,607  | 1,299,366   | 310,615    | 18,506    | * 257               | 247       | 291,604      |  |  |  |  |  |
| Angola                               | 986               | 244,866                               | 41,073   | 203,794   | 39,208     | **        | 0                   | **        | 39,107       |  |  |  |  |  |
| Egypt                                | 843               | 132,418                               | 17,393   | 115,025   | 29,968     | **        | **                  | 0         | 29,468       |  |  |  |  |  |
| Kenya                                | 1,188             | 128,635                               | 16,536   | 112,099   | 38,160     | **        | **                  | **        | 37,961       |  |  |  |  |  |
| Morocco                              | 84                | 17,874                                | 2,440  | 15,433  | 4,760      | **        | 0                   | 0         | **           |  |  |  |  |  |
| Nigeria                              | 1,315             | 232,522                               | 48,179   | 184,343   | 41,187     | **        | 0                   | **        | 38,024       |  |  |  |  |  |
| South Africa                         | 4,141             | 298,128                               | 69,828   | 228,300   | 48,090     | 2,823     | **                  | **        | 45,054       |  |  |  |  |  |
| Other African countries              | 4,785             | 529,528                               | 89,156   | 440,370   | 109,236    | ** 15,682 | ** 257              | ** 247    | ** 101,987   |  |  |  |  |  |

# Table 4. Individual Income Tax Returns With Form 1116: Foreign-Source Income, Deductions, and Taxes, by Country or Region, Tax Year 2016—Continued [All figures are estimates based on samples—money amounts are in thousands of dollars]

|                         |                   | Foreign-                  | Foreign-                           | Foreign-<br>source                | Foreign taxes paid or accrued on: |           |                     |           |              |  |  |
|-------------------------|-------------------|---------------------------|------------------------------------|-----------------------------------|-----------------------------------|-----------|---------------------|-----------|--------------|--|--|
| Country or region       | Number of returns | source<br>gross<br>income | source<br>deductions<br>and losses | taxable income before adjustments | Total                             | Dividends | Rents and royalties | Interest  | Other income |  |  |
|                         | (1)               | (2)                       | (3)                                | (4)                               | (5)                               | (6)       | (7)                 | (8)       | (9)          |  |  |
| Asia, total             | 333,353           | 33,054,025                | 5,385,518                          | 27,668,508                        | 6,586,054                         | 203,962   | 93,138              | 104,054   | 6,184,900    |  |  |
| Afghanistan             | 4,098             | 306,774                   | 160,445                            | 146,329                           | 11,309                            | **        | **                  | 0         | 10,188       |  |  |
| China                   | 49,144            | 5,796,417                 | 844,165                            | 4,952,252                         | 1,581,604                         | 56,848    | 2,053               | * 28      | 1,522,676    |  |  |
| Hong Kong               | 16,865            | 3,919,285                 | 1,098,300                          | 2,820,986                         | 488,330                           | 3,021     | 2,123               | * 506     | 482,679      |  |  |
| India                   | 71,909            | 8,772,657                 | 716,491                            | 8,056,167                         | 1,383,024                         | 8,065     | 20,488              | 88,125    | 1,266,347    |  |  |
| Indonesia               | 2,627             | 381,898                   | 21,392                             | 360,506                           | 127,997                           | 598       | **                  | **        | 126,377      |  |  |
| Iraq                    | 1,678             | 172,049                   | 18,333                             | 153,717                           | 21,488                            | 0         | 0                   | 0         | 21,488       |  |  |
| Israel                  | 46,617            | 2,052,711                 | 530,925                            | 1,521,786                         | 532,984                           | 20,228    | 2,400               | 4,227     | 506,131      |  |  |
| Japan                   | 61,966            | 2,871,904                 | 493,307                            | 2,378,597                         | 812,864                           | 26,172    | 2,458               | 1,476     | 782,758      |  |  |
| Kuwait                  | 270               | 10,685                    | 1,284                              | 9,401                             | * 121                             | 0         | 0                   | 0         | * 121        |  |  |
| Lebanon                 | 2,480             | 107,261                   | 14,586                             | 92,675                            | 9,515                             | * 1,203   | 0                   | 2,796     | 5,516        |  |  |
| Malaysia                | 1,820             | 243,823                   | 31,737                             | 212,086                           | 74,410                            | **        | **                  | 0         | 74,302       |  |  |
| Philippines             | 2,226             | 221,036                   | 37,464                             | 183,572                           | 51,662                            | 5,330     | * 272               | 12        | 46,048       |  |  |
| Qatar                   | 1,339             | 156,150                   | 11,054                             | 145,095                           | * 337                             | 0         | 0                   | 0         | * 337        |  |  |
| Saudi Arabia            | 2,894             | 433,167                   | 57,640                             | 375,527                           | 11,318                            | **        | 0                   | 0         | **           |  |  |
| Singapore               | 13,102            | 2,416,642                 | 362,853                            | 2,053,789                         | 462,794                           | 758       | 639                 | * 4       | 461,394      |  |  |
| South Korea             | 20,757            | 2,055,684                 | 357,368                            | 1,698,316                         | 420,717                           | 27,142    | 54,042              | 4,184     | 335,349      |  |  |
| Taiwan                  | 11,274            | 887,228                   | 149,607                            | 737,620                           | 208,761                           | 51,556    | 8,134               | 312       | 148,759      |  |  |
| Thailand                | 6,151             | 494,966                   | 69,658                             | 425,308                           | 154,945                           | 643       | * 151               | 731       | 153,420      |  |  |
| United Arab Emirates    | 3,459             | 579,383                   | 101,974                            | 477,409                           | 4,212                             | **        | 0                   | **        | 4,205        |  |  |
| Other Asian countries   | 12,676            | 1,174,308                 | 306,934                            | 867,370                           | 227,664                           | ** 2,399  | ** 378              | ** 1,654  | ** 236,807   |  |  |
| Oceania, total          | 47,776            | 3,488,327                 | 954,754                            | 2,533,573                         | 883,424                           | 16,775    | 10,608              | 27,968    | 828,073      |  |  |
| Australia               | 32,227            | 2,793,830                 | 809,708                            | 1,984,122                         | 726,387                           | 8,733     | 10,153              | 4,843     | 702,659      |  |  |
| New Zealand             | 13,458            | 609,617                   | 134,304                            | 475,313                           | 152,316                           | 7,965     | * 455               | 23,125    | 120,770      |  |  |
| Other Oceania countries | 2,090             | 84,881                    | 10,743                             | 74,137                            | 4,721                             | 77        | 0                   | 0         | 4,643        |  |  |
| U.S. Possessions, total | 44,050            | 1,641,021                 | 463,676                            | 1,177,345                         | 161,531                           | 4,951     | 97                  | 12        | 156,470      |  |  |
| Puerto Rico             | 42,470            | 1,439,768                 | 375,808                            | 1,063,960                         | 144,426                           | 4,689     | [2]                 | [2]       | 139,643      |  |  |
| Other U.S. Possessions  | 1,582             | 201,254                   | 87,868                             | 113,386                           | 17,104                            | 262       | [2]                 | [2]       | 16,827       |  |  |
| Country not stated      | 4,973,961         | 115,679,879               | 62,740,988                         | 52,938,892                        | 5,356,883                         | 1,578,987 | ** 19,261           | ** 13,960 | 3,744,816    |  |  |
| High taxed [3]          | 143,697           | 184,076                   | 61,496                             | 122,580                           | 23,312                            | 9,701     | **                  | **        | 13,471       |  |  |

<sup>\*</sup> Estimate should be used with caution because of the small number of sample returns on which it is based.
\*\* Data combined to prevent disclosure of taxpayer information.

<sup>[1]</sup> Adjustments include allocation of foreign and U.S. losses, recapture of prior-year foreign losses, and recharacterization of income.

<sup>[2]</sup> Data deleted to prevent disclosure of taxpayer information.

<sup>[3]</sup> High taxed is passive category income and taxes treated as general limitation category income and taxes because the foreign taxes paid on the income (after expenses) exceeds the highest U.S. tax that can be imposed on the income, and is not reported by country. Data by type of income are shown in Table 5.

NOTES: Detail may not add to totals because of rounding. Data are from Forms 1116, Foreign Tax Credit, which U.S. taxpayers file with Form 1040, U.S. Individual Income Tax Return.

SOURCE: IRS, Statistics of Income, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.

# Table 5. Individual Income Tax Returns With Form 1116: Foreign-Source Income, Deductions, and Taxes, by Type of Income, Tax Year 2016

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

| Type of income                          | Number of returns [1] | Foreign<br>gross i | n-source<br>ncome | Foreign-source<br>and lo |                   | Foreign-sou<br>income before a |                   |
|---|-----------------------|--------------------|-------------------|--------------------------|-------------------|--------------------------------|-------------------|
|   | returns [1]           | Number of returns  | Amount            | Number of returns        | Amount            | Number of returns              | Amount            |
|   | (1)                   | (2)                | (3)               | (4)                      | (5)               | (6)                            | (7)               |
| All returns                             | 4,989,329             | 4,562,629          | 216,699,618       | 4,384,349                | 89,107,527        | 4,578,447                      | 127,592,091       |
| Passive income [4]                      | 4,096,253             | 3,750,601          | 66,158,157        | 311,805                  | 14,345,005        | 3,752,474                      | 45,450,258        |
| General limitation income [5]           | 1,460,362             | 1,152,840          | 149,334,956       | 152,291                  | 59,023,128        | 1,181,004                      | 81,122,054        |
| Section 901(j) income [6]               | 297                   | 244                | 8,481             | 136                      | 4,211             | 250                            | 3,474             |
| Certain income re-sourced by treaty [7] | 21,776                | 17,905             | 1,146,340         | 1,237                    | 116,556           | 17,900                         | 968,183           |
| Lump-sum distributions [8]              | 1,020                 | 660                | 51,685            | * 15                     | * 454             | * 454 660                      |                   |
|   |                       |                    | Foreign           | taxes paid or acc        | rued on:          |                                |                   |
| Type of income                          | Tot                   | tal                | Dividends         |                          | Rents and         | d royalties                    | Interest          |
|   | Number of returns     | Amount             | Number of returns | Amount                   | Number of returns | Amount                         | Number of returns |
|   | (8)                   | (9)                | (10)              | (11)                     | (12)              | (13)                           | (14)              |
| All returns                             | 4,179,809             | 27,037,624         | 3,612,872         | 2,437,611                | 37,423            | 335,782                        | 118,662           |
| Passive income [4]                      | 3,405,684             | 5,291,733          | 3,123,655         | 2,108,249                | 31,508            | 242,509                        | 113,471           |
| General limitation income [5]           | 986,119               | 21,411,277         | 519,195           | 321,019                  | 5,911             | 92,941                         | 4,987             |
| Section 901(j) income [6]               | 124                   | 144                | **                | **                       | 0                 | 0                              | *:                |
| Certain income re-sourced by treaty [7] | 17,241                | 322,859            | 1,513             | 8,301                    | ** 36             | ** 332                         | ** 798            |
| Lump-sum distributions [8]              | 1,013                 | 11,611             | ** 328            | ** 41                    | **                | **                             | *:                |
| Type of income                          | Foreign Interest      | taxes paid or acc  |                   | Foreign taxe<br>for c    |                   | Gross foreign tax credit [3]   |                   |
|   | Amount                | Number of returns  | Amount            | Number of returns        | Amount            | Number of returns              | Amount            |
|   | (15)                  | (16)               | (17)              | (18)                     | (19)              | (20)                           | (21)              |
| All returns                             | 269,903               | 853,977            | 23,994,329        | 4,669,145                | 47,335,683        | 3,536,520                      | 19,813,843        |
| Passive income [4]                      | 258,284               | 430,615            | 2,682,691         | 3,737,876                | 9,663,093         | 2,828,703                      | 3,879,289         |
| General limitation income [5]           | 8,636                 | 493,710            | 20,988,681        | 1,273,516                | 37,128,029        | 876,399                        | 15,691,914        |
| Section 901(j) income [6]               | **                    | 87                 | 132               | 134                      | 155               | 0                              | (                 |
| Certain income re-sourced by treaty [7] | ** 2,984              | 15,869             | 311,367           | 20,834                   | 532,934           | 15,900                         | 233,27            |
|   |                       |                    |                   |                          |                   |                                |                   |

<sup>\*</sup> Estimate should be used with caution because of the small number of sample returns on which it is based

<sup>\*\*</sup> Data combined to prevent disclosure of taxpayer information.

<sup>[1]</sup> Taxpayers may report more than one type of foreign-source income on a return. Consequently, the number of returns by type of income do not add to total. In addition to Column 1, this is true for Columns 2, 4, 6, etc.

<sup>[2]</sup> Adjustments include allocation of foreign and U.S. losses, recapture of prior-year foreign losses, and recharacterization of income.

<sup>[3]</sup> This is before adjustments. Adjustments include reductions for participation in unsanctioned international boycotts and increases permitted by tax treaties between the United States and certain foreign countries.

<sup>[4]</sup> Passive income generally includes dividends, interest, rents, royalties, and annuities.

<sup>[5]</sup> General limitation income is foreign income from sources outside the United States that do not fall into one of the other four categories; it includes high-taxed income that would otherwise be passive income.

<sup>[6]</sup> Section 901(j) income is income earned from activities conducted in a sanctioned country. No credit is allowed for taxes paid or accrued to sanctioned countries, which for 2016 were Iran, North Korea, Sudan, and Syria.

<sup>[7]</sup> Certain income re-sourced by treaty allows specific types of income to be treated as foreign-source income, if there is a tax treaty that treats it as such, and the treaty is applied.

<sup>[8]</sup> Lump-sum distributions are distributions from a retirement plan that are subject to U.S. tax using income averaging.

NOTES: Detail may not add to totals because of rounding. Data are from Forms 1116, Foreign Tax Credit, which U.S. taxpayers file with Form 1040, U.S. Individual Income Tax Return. SOURCE: IRS, Statistics of Income, Individual Foreign-Earned Income and Foreign Tax Credit, October 2019.