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Inside This Issue

Individual Noncash Charitable Contributions, Tax Year 2019 — 2

by Christopher Williams, Janette Wilson, and Shamika France

This article presents Tax Year 2019 cross-section data for noncash charitable contributions carried to the Form 1040, *U.S. Individual Income Tax Return*, Schedule A, *Itemized Deductions*, from Form 8283, *Noncash Charitable Contributions.* Total noncash charitable contributions were $74.8 billion as reported on approximately 8.8 million returns, of which $72.8 billion, from approximately 3.9 million returns, was carried to the Schedule A using Form 8283. This represents an increase of 2.8 percent, or approximately $2.0 billion, from Tax Year 2018, while the number of Forms 8283 filed decreased by 7.5 percent.

Corporate Foreign Tax Credit, Tax Year 2018 — 28

by Melissa Costa

For Tax Year 2018, over 9,800 corporations reported almost $768 billion of foreign-source taxable income and claimed a foreign tax credit totaling over $103 billion. Although the foreign tax credit appears to have increased 71 percent over Tax Year 2017, much of the apparent jump is due to differences in the reporting requirements for section 965, a one-time provision which applied mostly to Tax Years 2017 and 2018. Data for Tax Year 2017 section 965 amounts for these statistics are not available since corporations with tax years ending before December 31, 2018, were not required to report section 965 amounts on Form 1118, *Foreign Tax Credit—Corporations.* Taxable income from the section 965 provisions was responsible for about 45 percent of the foreign-source taxable income for Tax Year 2018, while the new global intangible low-taxed income (GILTI) provisions were responsible for nearly 22 percent of the foreign taxable income. Corporations that produce pharmaceuticals and medicines filed less than 1 percent of the number of returns with a foreign tax credit but were responsible for 23 percent of the total foreign-source taxable income.

Individual Noncash Charitable Contributions, Tax Year 2019

by Christopher Williams, Janette Wilson, and Shamika France

For Tax Year 2019, individual taxpayers who itemized deductions reported a total of $74.8 billion in noncash charitable contributions on 8.8 million returns. About 45 percent (3.9 million) of these returns carried $72.8 billion in charitable contributions to Schedule A, *Itemized Deductions*, using Form 8283, *Noncash Charitable Contributions.* Form 8283 is used by individual taxpayers when the deduction amount claimed for all noncash donations reported on Schedule A exceeds $500. The number of returns filed with Form 8283 declined from 2018 levels by 7.5 percent, and the amount claimed by these taxpayers increased 2.8 percent. The average amount per return increased 11.2 percent from approximately $16,760 to approximately $18,635.

Donations of corporate stock, mutual funds, and other investments accounted for 59.8 percent ($43.6 billion) of all donations. Of the $72.8 billion in total donations, foundations received the largest amount ($20.1 billion or 27.6 percent), followed by donor-advised funds ($14.3 billion or 19.6 percent). Individuals with an adjusted gross income (AGI) over $10,000,000 donated 42.7 percent ($31.1 billion) of all donations, a slight (1.7 percent) decrease from the previous year. Donors in the age 55-under-65 category had the largest increase in donations of all age groups, increasing the amounts they carried to Schedule A by 44.8 percent, from $15.4 billion in 2018 to $22.3 billion in 2019.

Types of Noncash Contributions

Donations of corporate stock accounted for the highest amount carried to Schedule A ($39.6 billion, 54.4 percent of the total) for 2019. Although easement donations were the second largest category ($8.4 billion), they only represented 11.6 percent of all donations. Clothing was the third largest category ($6.7 billion, 9.2 percent of the total) (Figure A). Corporate stock donations averaged a relatively large amount of approximately $257,000 per return, while clothing donations averaged about $2,415 per return. Easements, however, had the largest average donation amount of $1.4 million per return, with an estimated 6,005 returns carrying donations to Schedule A. Donations of land had the second largest average donation amount of nearly $630,000 per return based on 3,300 returns that carried a total of $2.1 billion in donations to Schedule A.

From Tax Year 2018 to Tax Year 2019, the number of returns filed with donations declined 7.5 percent from 4.2 million to 3.9 million (Figure B). Returns with corporate stock donations increased 1.7 percent from approximately 151,800 in Tax Year 2018 to a little more than 154,300 in 2019, while the amount carried to Schedule A increased 2.6 percent. These donations represented 54.4 percent of all donations. Although the number of returns with easement donations declined 39.0 percent from approximately 9,845 in Tax Year 2018 to 6,005 in 2019, the donation amount increased 29.8 percent from $6.5 billion in 2018 to $8.4 billion in 2019. Returns with clothing donations, the third largest donation category (down from the second largest in Tax Year 2018), declined 7.4 percent. In addition, the amount of these donations declined 3.0 percent from $6.9 billion in 2018 to $6.7 billion in 2019.

Overall, the average donation amount per return for noncash contributions increased 11.2 percent, from about $16,760 per return with an attached Form 8283 in 2018 to $18,635 in 2019. Average corporate stock donations per return increased 0.9 percent from $254,305 per return in Tax Year 2018 to approximately $256,660 in Tax Year 2019. In addition, the average amount claimed for clothing donations, the third largest donation type, rose 4.8 percent, from $2,305 to about $2,415 per return. Average donations of household items per return increased 3.4 percent, from approximately $2,515 to $2,600 per return. In both tax years, easement donations had the largest average amount carried per return to Schedule A, and this amount increased 112.7 percent, from about $660,665 in 2018 to $1.4 million per return in 2019. Services (-58.4 percent), planes, boats, and other vehicles (-49.5 percent), and other investments (-47.6 percent) experienced the largest declines from 2018 levels in average donation amount per return.

Since Tax Year 2007, corporate stock donations have consistently been the highest amount carried to Schedule A (Figure C). Donations of real estate, land, and easements had the largest increase, going up by $2.2 billion from the previous year to $11.8 billion for 2019. For Tax Year 2019, the amounts of clothing and household items continued their declines from their Tax Year 2017 highs of $11.9 billion and $6.5 billion, to $6.7 billion and $4.5 billion, respectively.

Donations by Size of Adjusted Gross Income

Individuals in the $10 million or more adjusted gross income (AGI) group claimed donations of $31.1 billion (42.7 percent of the overall amount donated and 13 percent of their AGI) on just under 7,500 returns (the third smallest number of returns out of all the AGI groups) (Figure D). Those taxpayers in the $100,000-to-$200,000 category had the largest number of returns (1.4 million), representing 35.8 percent of the total returns claiming noncash contributions on Form 8283. In turn, they reported the third largest amount of AGI ($202.5 billion) and fifth largest amount of noncash charitable contributions ($5.2 billion) carried to the Schedule A. The $200,000-to-$500,000

Figure A

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type, Tax Year 2019

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

Type of donation	Number of returns [1]	Number of donations	Amount carried to Schedule A [2]	Average amount per return	Average amount per donation	Percent of number of donations	Percent of amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All donations	**3,907,728**	**12,545,983**	**72,819,215**	**18,635**	**5,804**	**100.0**	**100.0**
Corporate stock	154,331	406,249	39,610,545	256,661	97,503	3.2	54.4
Mutual funds	24,524	53,525	2,527,957	103,083	47,229	0.4	3.5
Other investments	5,643	9,310	1,414,814	250,715	151,963	0.1	1.9
Real estate	2,805	3,149	1,316,303	469,244	417,982	[3]	1.8
Land	3,300	3,756	2,077,041	629,319	552,977	[3]	2.9
Easements	6,005	8,025	8,438,663	1,405,165	1,051,532	0.1	11.6
Art and collectibles	71,846	93,124	1,401,812	19,511	15,053	0.7	1.9
Food	105,459	188,385	118,658	1,125	630	1.5	0.2
Clothing	2,771,561	6,672,404	6,698,556	2,417	1,004	53.2	9.2
Accessories	45,807	58,104	88,723	1,937	1,527	0.5	0.1
Electronics	211,091	262,356	523,565	2,480	1,996	2.1	0.7
Household items	1,723,760	3,741,865	4,480,959	2,600	1,198	29.8	6.2
Cars and other motor vehicles	75,484	78,768	136,267	1,805	1,730	0.6	0.2
Planes, boats, and other vehicles	3,964	3,987	76,469	19,290	19,179	[3]	0.1
Services	7,471	37,128	24,318	3,255	655	0.3	[3]
Airline tickets and miles	* 12	* 19	* 485	* 40,024	* 25,291	[3]	[3]
Other [4]	492,855	925,829	3,884,080	7,881	4,195	7.4	5.3

* Estimate should be used with caution due to the small number of sample returns on which it is based.
[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.
[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
[3] Less than 0.05 percent.
[4] Other donations include donations of intellectual property.
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Figure B

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type, Tax Years 2018 and 2019

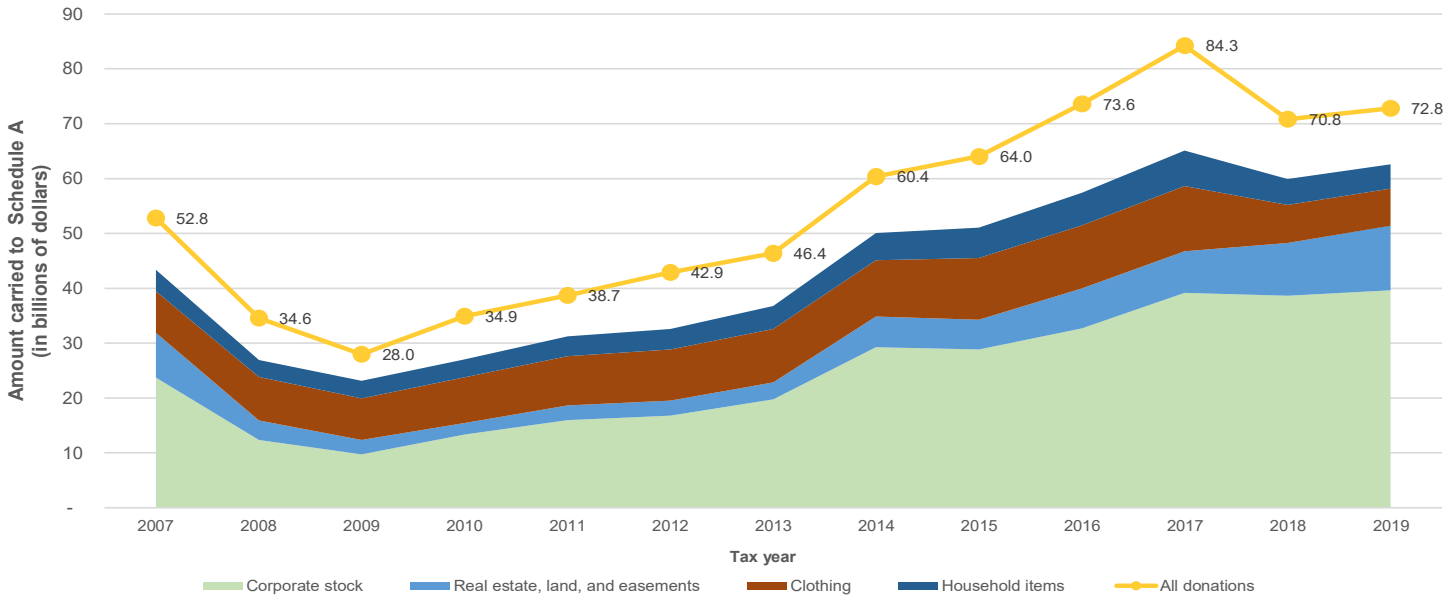
[All figures are estimates based on samples—money amounts are in thousands of dollars; average amounts are in whole dollars]

Type of donation	2018			2019			Percentage change		
	Number of returns [1]	Amount carried to Schedule A [2]	Average amount per return	Number of returns [1]	Amount carried to Schedule A [2]	Average amount per return	Number of returns [1]	Amount carried to Schedule A [2]	Average amount per return
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All donations	**4,226,280**	**70,841,856**	**16,762**	**3,907,728**	**72,819,215**	**18,635**	**-7.5**	**2.8**	**11.2**
Corporate stock	151,817	38,607,945	254,305	154,331	39,610,545	256,661	1.7	2.6	0.9
Mutual funds	17,191	2,400,737	139,655	24,524	2,527,957	103,083	42.7	5.3	-26.2
Other investments	3,522	1,684,445	478,230	5,643	1,414,814	250,715	60.2	-16.0	-47.6
Real estate	2,551	1,163,076	455,892	2,805	1,316,303	469,244	10.0	13.2	2.9
Land	5,425	1,994,156	367,584	3,300	2,077,041	629,319	-39.2	4.2	71.2
Easements	9,844	6,503,494	660,666	6,005	8,438,663	1,405,165	-39.0	29.8	112.7
Art and collectibles	75,327	1,554,736	20,640	71,846	1,401,812	19,511	-4.6	-9.8	-5.5
Food	108,513	134,979	1,244	105,459	118,658	1,125	-2.8	-12.1	-9.5
Clothing	2,994,164	6,902,741	2,305	2,771,561	6,698,556	2,417	-7.4	-3.0	4.8
Accessories	61,398	96,616	1,574	45,807	88,723	1,937	-25.4	-8.2	23.1
Electronics	226,439	320,979	1,418	211,091	523,565	2,480	-6.8	63.1	75.0
Household items	1,896,389	4,768,052	2,514	1,723,760	4,480,959	2,600	-9.1	-6.0	3.4
Cars and other motor vehicles	98,400	199,531	2,028	75,484	136,267	1,805	-23.3	-31.7	-11.0
Planes, boats, and other vehicles	3,669	194,247	52,944	3,964	76,469	26,726	8.0	-60.6	-49.5
Services	9,789	76,665	7,832	7,471	24,318	3,255	-23.7	-68.3	-58.4
Airline tickets and miles	380	1,125	2,960	* 12	* 485	* 40,024	* -96.8	* -56.9	* 1,252.4
Other [3]	540,659	4,238,332	7,839	492,855	3,884,080	7,881	-8.8	-8.4	0.5

* Estimate should be used with caution due to the small number of sample returns on which it is based.
[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.
[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
[3] Other donations include donations of intellectual property.
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Figure C

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, Amounts Carried to Schedule A, by Donation Type, Tax Years 2007–2019



SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Figure D

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income (AGI)	Number of returns	Percent of returns with charitable contributions	AGI	Amount carried to Schedule A [1]	Percent of amount carried to Schedule A	Donation as percent of AGI	Average donation per return
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All returns	**3,907,728**	**100.0**	**1,221,775,427**	**72,819,215**	**100.0**	**6.0**	**18,635**
Under $5,000 (including deficits)	5,602	0.1	-890,522	39,190	0.1	-4.4	6,996
$5,000 under $10,000	7,352	0.2	57,525	11,536	[2]	20.1	1,569
$10,000 under $15,000	16,557	0.4	207,906	39,916	0.1	19.2	2,411
$15,000 under $20,000	22,171	0.6	388,933	115,069	0.2	29.6	5,190
$20,000 under $25,000	30,913	0.8	699,726	125,582	0.2	17.9	4,062
$25,000 under $30,000	37,912	1.0	1,044,682	161,680	0.2	15.5	4,265
$30,000 under $40,000	110,266	2.8	3,871,450	465,511	0.6	12.0	4,222
$40,000 under $50,000	131,787	3.4	5,923,983	578,499	0.8	9.8	4,390
$50,000 under $75,000	425,958	10.9	26,767,024	2,002,958	2.8	7.5	4,702
$75,000 under $100,000	413,731	10.6	36,168,869	1,553,487	2.1	4.3	3,755
$100,000 under $200,000	1,399,027	35.8	202,451,910	5,170,037	7.1	2.6	3,695
$200,000 under $500,000	968,835	24.8	287,142,464	6,085,823	8.4	2.1	6,282
$500,000 under $1,000,000	211,140	5.4	143,502,467	8,281,080	11.4	5.8	39,221
$1,000,000 under $1,500,000	51,431	1.3	61,906,146	2,916,800	4.0	4.7	56,713
$1,500,000 under $2,000,000	23,043	0.6	39,567,928	2,619,008	3.6	6.6	113,655
$2,000,000 under $5,000,000	34,524	0.9	104,235,789	6,854,617	9.4	6.6	198,549
$5,000,000 under $10,000,000	10,008	0.3	68,992,282	4,719,272	6.5	6.8	471,539
$10,000,000 or more	7,473	0.2	239,736,865	31,079,150	42.7	13.0	4,158,859

[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, other than publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
[2] Less than 0.05 percent.
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

group had the second largest number of returns with Form 8283 claims (968.8 thousand or 24.8 percent of the total), the largest portion of AGI ($287.1 billion), and the fourth largest amount carried to the Schedule A ($6.1 billion). While the combined AGI of these two income groups was slightly over 40 percent of the cumulative AGI for all Form 8283 filers, their contributions only accounted for approximately 15.5 percent of the total amount carried to Schedule A. Thus, these two income groups had the lowest donations as a percentage of AGI at 2.6 percent and 2.1 percent, respectively.

The percentage change in the number of individuals claiming noncash charitable contributions between Tax Years 2018 and 2019 indicates a decline for almost all AGI groups (Figure E). The number of taxpayers claiming noncash donations declined in 15 out of the 18 AGI brackets. The most substantive increase was among taxpayers with AGI $1,500,000 under $2,000,000, who filed 4.2 percent more returns with noncash contributions in 2019 than 2018 and claimed 25.1 percent more donations (increasing from $2.1 billion to $2.6 billion). In contrast, taxpayers with AGI over $10,000,000 filed 8.7 percent fewer returns, while their amount claimed declined 1.7 percent from $31.6 billion to $31.1 billion. Overall, the average donation amount per return increased 11.2 percent between 2018 and 2019, with most groups reporting increases. The most significant increase was for those taxpayers with AGI $500,000 under $1,000,000 whose average donation increased 74.2 percent, from a little over $22,510 to approximately $39,220. The most significant decline was by those in the AGI group under $5,000 (including deficits) whose average donation declined 58.4 percent, from about $16,800 to just under $7,000 for 2019.

Types of Charitable Organizations

Beneficiaries of noncash charitable contributions are classified for this study as arts, culture, and humanities groups, educational institutions, environment- and animal-related organizations, health and medical research organizations, large organizations, religious organizations, public and societal benefit organizations, foundations, and donor-advised funds, with the remainder classified as other donees (Figure F). Foundations were the largest beneficiaries ($20.1 billion), followed by donor-advised funds ($14.3 billion) and environment- and animal-related organizations ($9.9 billion), the three of which have consistently

Figure E

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Size of Adjusted Gross Income, Tax Years 2018 and 2019

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

Size of adjusted gross income	2018			2019			Percentage change		
	Number of returns	Amount carried to Schedule A [1]	Average amount per return	Number of returns	Amount carried to Schedule A [1]	Average amount per return	Number of returns	Amount carried to Schedule A [1]	Average amount per return
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All returns	**4,226,280**	**70,841,856**	**16,762**	**3,907,728**	**72,819,215**	**18,635**	**-7.5**	**2.8**	**11.2**
Under $5,000 (including deficits)	28,896	485,668	16,808	5,602	39,190	6,996	-80.6	-91.9	-58.4
$5,000 under $10,000	11,683	30,040	2,571	7,352	11,536	1,569	-37.1	-61.6	-39.0
$10,000 under $15,000	22,427	62,548	2,789	16,557	39,916	2,411	-26.2	-36.2	-13.6
$15,000 under $20,000	26,952	59,478	2,207	22,171	115,069	5,190	-17.7	93.5	135.2
$20,000 under $25,000	38,024	137,187	3,608	30,913	125,582	4,062	-18.7	-8.5	12.6
$25,000 under $30,000	46,274	196,152	4,239	37,912	161,680	4,265	-18.1	-17.6	0.6
$30,000 under $40,000	107,969	430,285	3,985	110,266	465,511	4,222	2.1	8.2	5.9
$40,000 under $50,000	158,887	894,404	5,629	131,787	578,499	4,390	-17.1	-35.3	-22.0
$50,000 under $75,000	453,771	1,736,468	3,827	425,958	2,002,958	4,702	-6.1	15.3	22.9
$75,000 under $100,000	451,686	1,713,335	3,793	413,731	1,553,487	3,755	-8.4	-9.3	-1.0
$100,000 under $200,000	1,560,310	5,810,866	3,724	1,399,027	5,170,037	3,695	-10.3	-11.0	-0.8
$200,000 under $500,000	975,770	5,864,363	6,010	968,835	6,085,823	6,282	-0.7	3.8	4.5
$500,000 under $1,000,000	216,835	4,882,515	22,517	211,140	8,281,080	39,221	-2.6	69.6	74.2
$1,000,000 under $1,500,000	51,282	2,751,756	53,660	51,431	2,916,800	56,713	0.3	6.0	5.7
$1,500,000 under $2,000,000	22,119	2,094,226	94,682	23,043	2,619,008	113,655	4.2	25.1	20.0
$2,000,000 under $5,000,000	34,965	7,234,180	206,895	34,524	6,854,617	198,549	-1.3	-5.2	-4.0
$5,000,000 under $10,000,000	10,242	4,825,899	471,174	10,008	4,719,272	471,539	-2.3	-2.2	0.1
$10,000,000 or more	8,187	31,632,486	3,863,746	7,473	31,079,150	4,158,859	-8.7	-1.7	7.6

[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, other than publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).

NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*

SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Figure F

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type, Tax Year 2019

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

Type of donee	Number of returns [1]	Number of donations	Amount carried to Schedule A [2]	Average amount per return	Average amount per donation	Percent of number of donations	Percent of amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All donees	**3,907,728**	**12,545,983**	**72,819,215**	**18,635**	**5,804**	**100.0**	**100.0**
Arts, culture, and humanities	113,644	172,291	2,378,833	20,932	13,807	1.4	3.3
Educational institutions	158,895	272,376	4,287,689	26,984	15,742	2.2	5.9
Environment- and animal-related organizations	104,308	192,403	9,871,504	94,638	51,306	1.5	13.6
Health and medical research	365,641	710,025	1,668,695	4,564	2,350	5.7	2.3
Large organizations	3,056,904	8,102,703	9,407,565	3,077	1,161	64.6	12.9
Public and societal benefit	695,171	1,386,763	3,143,012	4,521	2,266	11.1	4.3
Religious organizations	548,291	1,169,405	3,412,017	6,223	2,918	9.3	4.7
Donor-advised funds	73,060	168,478	14,272,741	195,357	84,716	1.3	19.6
Foundations	60,386	103,489	20,084,782	332,607	194,076	0.8	27.6
Other donees	185,752	268,049	4,292,378	23,108	16,013	2.1	5.9

[1] Total number of returns does not equal the sum of returns by donee type because a return could have donations to more than one type of donee.
[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, other than publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions*.
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

been among the greatest beneficiaries of noncash charitable contributions. Foundations received 27.6 percent of all donations on just less than 60,400 returns, with an average donation per return of approximately $332,607. Donor-advised funds received 19.6 percent of all donations on an estimated 73,060 returns having an average donation of $195,357 per return. In contrast, donations to environment- and animal-related organizations were reported on 104,308 returns, resulting in an average amount of $94,638 per return.

Less than half of categories experienced increases in the amount of donation claims from 2018 to 2019, with the most significant growth occurring in donations to donor-advised funds (25.8 percent, from $11.3 billion to $14.3 billion), environment- and animal-related organizations (25.5-percent increase, from $7.9 billion to $9.9 billion, representing 13.6 percent of all donations), and public and societal benefit (15.5-percent increase from $2.7 billion to $3.1 billion representing 4.3 percent of all donations) (Figure G). In addition, nearly all categories received

Figure G

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type, Tax Years 2018 and 2019

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

Type of donee	2018			2019			Percentage change	
	Number of returns [1]	Amount carried to Schedule A [2]	Average amount per return	Number of returns [1]	Amount carried to Schedule A [2]	Average amount per return	Number of returns [1]	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All donees	**4,226,280**	**70,841,856**	**16,762**	**3,907,728**	**72,819,215**	**18,635**	**-7.5**	**2.8**
Arts, culture, and humanities	127,805	3,089,304	24,172	113,644	2,378,833	20,932	-11.1	-23.0
Educational institutions	166,858	4,866,449	29,165	158,895	4,287,689	26,984	-4.8	-11.9
Environment- and animal-related organizations	107,882	7,863,257	72,888	104,308	9,871,504	94,638	-3.3	25.5
Health and medical research	391,715	1,810,681	4,622	365,641	1,668,695	4,564	-6.7	-7.8
Large organizations	3,305,704	9,713,045	2,938	3,056,904	9,407,565	3,077	-7.5	-3.1
Public and societal benefit	816,994	2,720,443	3,330	695,171	3,143,012	4,521	-14.9	15.5
Religious organizations	557,287	3,574,766	6,415	548,291	3,412,017	6,223	-1.6	-4.6
Donor-advised funds	71,862	11,348,529	157,921	73,060	14,272,741	195,357	1.7	25.8
Foundations	64,677	21,650,309	334,747	60,386	20,084,782	332,607	-6.6	-7.2
Other donees	223,103	4,205,073	18,848	185,752	4,292,378	23,108	-16.7	2.1

[1] Total number of returns does not equal the sum of returns by donee type because a return could have donations to more than one type of donee.
[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions*.
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

donations on fewer returns, with the exception of donor-advised funds, which experienced a 1.7-percent growth in donors. Aside from the classification of other donees, donations to those classified as public and societal benefit showed the largest decline in number of returns (14.9 percent), followed by those classified as arts, culture, and humanities (11.1 percent). Public and societal benefit organizations experienced the largest percentage increase in average donation per return (35.8 percent, from $3,330 in Tax Year 2018 to about $4,520 in 2019), while arts, cultures, and humanities experienced the largest percentage decrease (13.4 percent), from almost $24,175 in Tax Year 2018 to about $20,930 in Tax Year 2019.

Most organization categories received more donations in Tax Year 2017 than they received in any of the preceding 10 years, or since Tax Year 2007 (Figure H). Furthermore, between 2009 and 2017, the amount of donations received more than doubled for six out of the nine organization types (excluding those classified as other). However, in Tax Year 2018 these trends changed significantly, and most organization types received fewer donation amounts. For Tax Year 2019, just over half of the organization types continued their downward trend in donation amounts, with the largest decrease for foundations ($1.6 billion), while the others returned to their increasing trend, with the largest increase in donor-advised funds donation amounts ($2.9 billion).

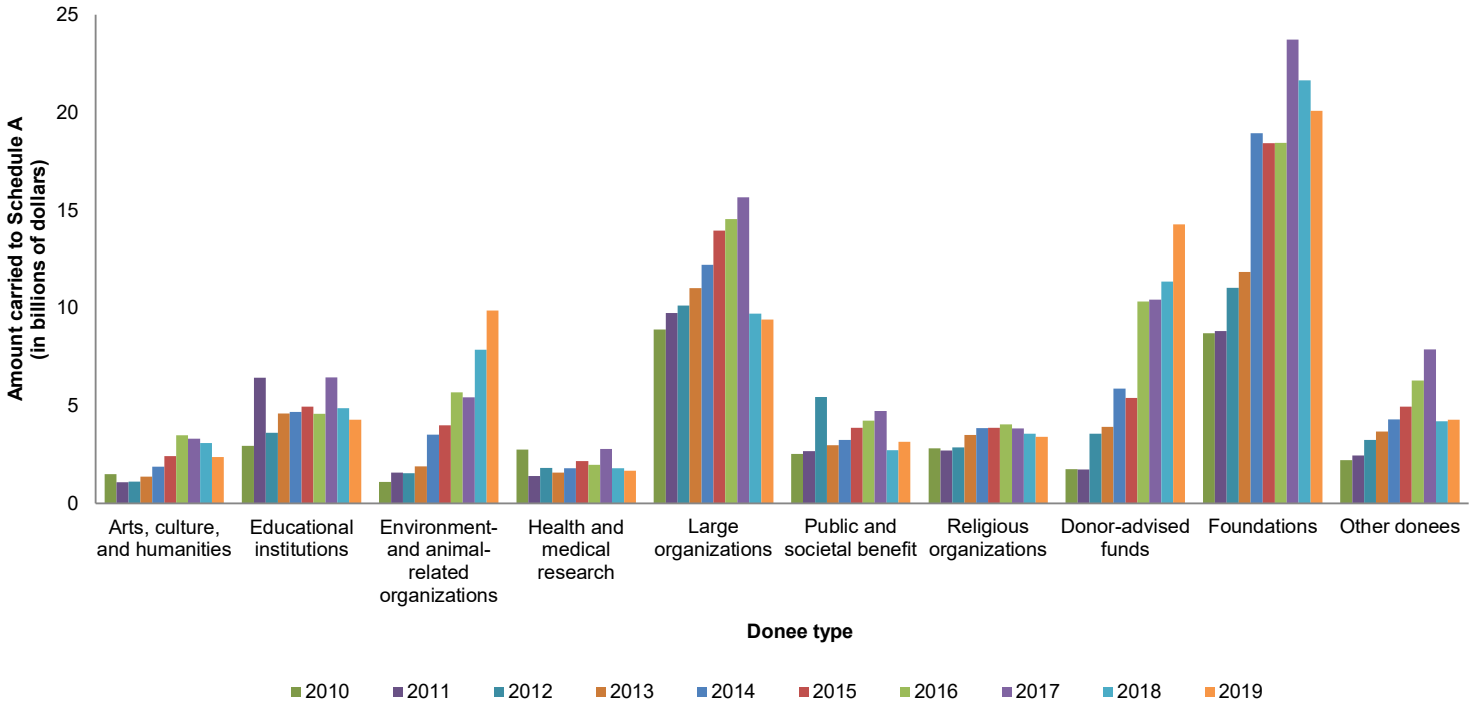
Donations by Age

For those taxpayers filing Form 8283 in Tax Year 2019, individuals aged 65 and over reported the largest total donation amount claimed on Schedule A for both noncash and cash contributions (Figure I). These taxpayers donated $13.2 billion (36.9 percent) of the total $35.9 billion claimed in cash contributions. In addition, they accounted for $24.9 billion out of the total $72.8 billion claimed in noncash contributions. However, while they accounted for, by far, the largest amount donated, the age 65- and-over category was only the third largest in terms of the number of returns filed for both noncash (an estimated 806,105 returns, or 20.6 percent) and cash (about 752,040 returns or 22.2 percent) donations. The average noncash contribution for this group was approximately $30,930 per return, more than quadruple the just over $6,975 per return reported by the age group (under 35) with the smallest average noncash contribution. With an AGI of $282.8 billion, the age 65-and-over group donated 8.8 percent of their income in noncash charitable contributions, increasing to 13.5 percent when cash contributions were included.

For taxpayers aged 65 and over, the $17.6 billion in donations of corporate stock, mutual funds, and other investments represented 70.5 percent of their donations (Table 4). Furthermore, this group accounted for 40.4 percent of all stock, mutual funds, and other investments donated, as well as 34.2 percent

Figure H

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, Amounts Carried to Schedule A, by Donee Type, Tax Years 2010–2019



SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Figure I

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Age of Donor, Tax Year 2019

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

Donor age [1]	Number of returns	Amount carried to Schedule A [2]	Average amount per return	Adjusted gross income less deficit (AGI)	Donation as a percent of AGI	Number of returns with cash contributions on Schedule A	Amount of cash contributions on Schedule A
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All ages	**3,907,728**	**72,819,215**	**18,635**	**1,221,775,427**	**6.0**	**3,380,381**	**35,931,944**
Under 35	254,660	1,776,606	6,976	39,413,076	4.5	196,871	966,203
35 under 45	750,324	7,614,123	10,148	191,762,102	4.0	607,793	3,775,421
45 under 55	1,068,781	16,161,553	15,121	351,386,736	4.6	922,035	7,690,999
55 under 65	1,027,858	22,334,979	21,730	356,394,698	6.3	901,643	10,252,605
65 and older	806,105	24,931,954	30,929	282,818,814	8.8	752,038	13,246,716

[1] Age for joint returns was based on the primary taxpayer's age.
[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, other than publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

of all noncash contributions, and 35.1 percent of all charitable donations, including cash donations, carried to Schedule A. Donations of real estate, land, and easements were the second largest category donated by taxpayers in the 65-and-over bracket with a value of $2.7 billion. Overall, the average amount of donations per return for taxpayers over age 65 decreased slightly from $32,053 in Tax Year 2018 to $30,929 in Tax Year 2019.

From Tax Year 2018 to Tax Year 2019, every age group filed fewer returns with an attached Form 8283, for a total decrease in returns of 7.5 percent (Figure J). Donors aged 55 under 65 increased their donation amounts from $15.4 billion in Tax Year 2018 to $22.3 billion in Tax Year 2019 (44.8 percent). Almost three-quarters of these donations ($16.1 billion) were in corporate stock.

Explanation of Selected Terms

Age—Defined by the primary taxpayer's age at the end of the filing year.

Amount carried to Schedule A—This is the fair market value from Form 8283, Section A, (items with a deduction of $5,000 or less and certain publicly traded securities) plus the lesser of the fair market value or amount claimed on Section B (items with a deduction of more than $5,000 except contributions of certain publicly traded securities). The dollar amounts of donations reported in this article reflect the amounts reported on Form 8283 that are carried to Schedule A for reporting itemized deductions.

Donor's cost—This is also known as the adjusted basis or tax basis and is generally the amount the owner paid for the

Figure J

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Age of Donor, Tax Years 2018 and 2019

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

Donor age [1]	2018			2019			Percentage change	
	Number of returns	Amount carried to Schedule A [2]	Average amount per return	Number of returns	Amount carried to Schedule A [2]	Average amount per return	Number of returns	Amount carried to Schedule A [2]
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All ages	**4,226,280**	**70,841,856**	**16,762**	**3,907,728**	**72,819,215**	**18,635**	**-7.5**	**2.8**
Under 35	287,573	5,330,459	18,536	254,660	1,776,606	6,976	-11.4	-66.7
35 under 45	783,358	7,280,209	9,294	750,324	7,614,123	10,148	-4.2	4.6
45 under 55	1,171,813	14,307,327	12,210	1,068,781	16,161,553	15,121	-8.8	13.0
55 under 65	1,094,476	15,426,874	14,095	1,027,858	22,334,979	21,730	-6.1	44.8
65 and older	889,059	28,496,987	32,053	806,105	24,931,954	30,929	-9.3	-12.5

[1] For joint returns, donor age is taken as the age of the primary taxpayer.
[2] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, other than publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTE: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

property. If the owner received property as a gift, the original cost carries over to the recipient of the gift, increased by any gift tax paid on the appreciated portion of the property. If acquired from a decedent, the basis is the fair market value of the property used for estate tax purposes.

Fair market value—The fair market value is the value a willing and knowledgeable buyer would pay a seller in a voluntary situation.

Number of donations—For this study, the IRS Statistics of Income (SOI) Division collected data in the manner reported by taxpayers. For example, if a tax return had clothing listed twice, even if it was given to the same donee organization, it was counted as two separate donations.

Number of returns—The number of returns in the Individual SOI sample with Form 8283 attached. For this study, SOI counted all returns with Form 8283 attached, whether or not the taxpayer carried Form 8283 amounts to Schedule A.

Note that the allowable amount of a noncash deduction depends on whether the property is ordinary income or capital gain property. Ordinary income property is property that, if sold, would generate ordinary income or short-term capital gain. Examples are clothing, household items, inventory, and capital assets held less than a year. Capital gain property results in a long-term gain, if sold. Examples of this are real property used for a taxpayer's business and corporate stock held more than 1 year. The total charitable deduction is generally limited to no more than 50 percent of AGI. This limitation is reduced to 20 percent or 30 percent depending on the type of property donated, the type of charitable organization to which the property is donated, and whether the property is donated to or for the use of the organization. The statistics in this article include the entire deduction amount reported by taxpayers and transcribed from Form 8283 to line 12 of Schedule A. The limitations are then applied to the amount reported on line 14 of that schedule.

Donated Property Types

Accessories—Includes belts, furs, jewelry, purses, scarves, and watches.

Art and collectibles—Includes art works, such as ceramics, drawings, paintings, photographs, and sculptures; and collectibles, including coins, books, historical documents, memorabilia, rare or valuable clothing, jewelry, and stamps.

Cars and other motor vehicles—Includes vehicles designed for road transportation, such as cars, buses, motorcycles, motor homes, SUVs, and trucks.

Clothing—Includes apparel for children, men, and women, such as coats, dresses, hats, shoes, and suits. Also includes sports and school uniforms.

Conservation easements—Includes land and right-of-way easements. Donations of this type must be a qualified real property interest contributed to a qualified organization for conservation purposes.[1]

Corporate stock—Includes shares of publicly traded and closely held common and preferred stock, as well as stock rights.

Electronics—Includes cameras, computer systems, copiers, DVD players, fax machines, stereo systems, televisions, telephones, and video games.

Façade easements—Includes real estate easements and historical preservation or architectural easements.

Food—Includes beverages, individual food items or meals, snacks, restaurant coupons, vitamins, and wine.

Household items—Includes appliances, books, exercise equipment, furniture, luggage, tools, and toys.

Intellectual property—Includes copyrights, patents, trademarks, trade names, trade secrets, and certain types of software.

Land—Includes farms, orchards, and open lots.

Mutual funds—Includes shares of taxable and nontaxable mutual funds, exchange-traded funds, and unit investment trusts.

Other investments—Includes annuities, bonds, certificates of deposit (CDs), life insurance policies, notes, options, partnership interests, and real estate investment trusts.

Planes, boats, and other vehicles—Includes all-terrain vehicles, airplanes, and watercraft vehicles, such as boats, canoes, ships, and jet skis.

Real estate—Includes apartments, cabins, houses, and other residential and commercial property.

Services—Includes audio presentations, catering, healthcare services, transport and travel expenses, tutoring, and other professional services.

Other—Includes animals, building materials, cemetery plots, medical equipment, tickets to events, and donated vacations or use of vacation property.

Donee Organizations

Arts, culture, and humanities—Includes organizations involved with the arts, music, history, and cultural activities, such as museums, libraries, science centers, and theaters.

Donor-advised funds—A segregated fund within a public charity that permits the donor to have advisory privileges on distributions or investments. Donations to donor-advised funds may be understated due to the difficulty of identifying all such donations because they ultimately distribute to another charity that could be of any type.

Educational institutions—Includes organizations whose primary function is educational, such as fraternities, schools (including those with a religious affiliation), scholarship funds, and universities.

Environment- and animal-related organizations—Includes organizations that protect, promote, or seek to improve the environment or welfare of animals, such as local animal shelters, botanical gardens, and garden clubs.

Foundations—A foundation is a type of philanthropic organization set up by individuals or institutions as a legal entity (usually either a corporation or trust) with the purpose of distributing

[1] Notice 2007-50, Guidance Regarding Deductions by Individuals for Qualified Conservation Contributions, includes a tax law change for conservation contributions such that the 50-percent-of-AGI limitation is increased to 100 percent (the 100-percent limitation) for eligible farmers and ranchers.

grants to support causes in line with the goals of the foundation. For the purpose of this study, this includes private foundations, which are often specific to a person or family, and community foundations.

Health and medical research—Includes hospitals, medical associations, nursing homes, and hospices.

Large organizations—Includes large national and international organizations that have local chapters, such as Goodwill Industries International, The Salvation Army, United Way International, Habitat for Humanity International, and Scouts BSA.

Other—Includes all other organizations that are not included in any other category.

Public or societal benefit—These are organizations that benefit individuals or communities and do not meet the conditions of other categories such as education, health, and religion. These include homeless shelters, food banks, and political think tanks.

Religious organizations—Includes churches, synagogues, and bookstores and thrift stores run by religious organizations.

Data Source and Limitations

These statistics are based on a sample of individual income tax returns (Forms 1040, and 1040-SR, including electronically filed returns) filed during Calendar Year 2020. The IRS Statistics of Income (SOI) Division stratified the returns in the sample based on the: (1) larger of positive income or negative income (absolute value); (2) size of business and farm receipts; (3) presence or absence of specific forms or schedules; and (4) usefulness of returns for tax policy modeling purposes. SOI then selected returns at rates ranging from 0.10 percent to 100 percent.

SOI based the Tax Year 2019 data on a sample of 370,894 returns and an estimated final population of 167,726,554 returns. The number of returns in the sample with an attached Form 8283 was 40,162.

Since the data presented here are estimates based on a sample of returns filed, they are subject to sampling error. To use the statistical data provided properly, the magnitude of the potential sampling error must be known; coefficients of variation (CVs) are used to measure that magnitude and are estimated for the number of returns and money amounts for selected income items (Figure K). The reliability of estimates based on samples and the use of CVs for evaluating the precision of estimates based on samples are discussed in SOI Sampling Methodology and Data Limitations (see https://www.irs.gov/uac/SOI-Tax-Stats-Statistical-Methodology).

Christopher Williams, Janette Wilson, and Shamika France are economists with the Individual Data Processing and Perfection Section. This article was prepared under the direction of Michael Strudler, Initiatives Manager Individual and Tax-Exempt Branch.

Figure K

All Individual Returns With Noncash Charitable Contributions Reported on Form 8283: Coefficients of Variation for Selected Items, by Size of Adjusted Gross Income, Tax Year 2019

[Coefficients of variation are in percentages]

Size of adjusted gross income	All donees				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**1.32**	**2.29**	**2.83**	**5.68**	**4.47**
Under $25,000 (including deficits)	10.66	13.65	16.55	16.21	16.28
$25,000 under $50,000	5.91	9.36	9.42	8.68	8.69
$50,000 under $75,000	4.79	7.16	11.04	26.40	10.70
$75,000 under $100,000	4.83	7.97	9.98	9.49	9.49
$100,000 under $200,000	2.52	4.78	5.39	4.69	4.69
$200,000 under $500,000	1.74	2.76	3.89	8.50	5.64
$500,000 under $1,000,000	2.19	3.47	19.40	29.28	37.73
$1,000,000 under $1,500,000	2.49	3.95	15.37	33.39	13.19
$1,500,000 under $2,000,000	2.09	3.04	16.75	20.20	14.85
$2,000,000 under $5,000,000	1.11	1.85	8.65	11.72	7.17
$5,000,000 under $10,000,000	1.15	2.73	6.39	18.71	3.11
$10,000,000 or more	0.00	0.00	0.00	0.00	0.00

[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.
[2] Not every donation has a donor cost reported.
[3] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTES: This figure is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.* For more information on the use of CVs for evaluating the precision of estimates based on samples, see the SOI Sampling Methodology and Data Limitations https://www.irs.gov/statistics/soi-tax-stats-statistical-methodology.
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Table 1A. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	All returns with donations				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**3,907,728**	**12,545,983**	**40,646,197**	**96,502,191**	**72,819,215**
Under $25,000 (including deficits)	82,594	197,271	584,367	333,012	331,294
$25,000 under $50,000	279,964	713,270	1,998,208	1,203,002	1,205,690
$50,000 under $75,000	425,958	1,206,281	3,441,908	2,572,342	2,002,958
$75,000 under $100,000	413,731	1,223,977	2,747,700	1,553,604	1,553,487
$100,000 under $200,000	1,399,027	4,753,647	9,713,703	5,171,812	5,170,037
$200,000 under $500,000	968,835	3,322,891	7,895,814	7,314,908	6,085,823
$500,000 under $1,000,000	211,140	686,983	3,933,689	14,016,265	8,281,080
$1,000,000 under $1,500,000	51,431	164,448	1,343,931	8,195,147	2,916,800
$1,500,000 under $2,000,000	23,043	77,861	926,031	4,651,200	2,619,008
$2,000,000 under $5,000,000	34,524	119,740	2,161,950	10,895,659	6,854,617
$5,000,000 under $10,000,000	10,008	39,484	1,334,378	8,054,733	4,719,272
$10,000,000 or more	7,473	40,131	4,564,518	32,540,506	31,079,150

Footnotes at end of Table 1J.

Table 1B. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of corporate stock, mutual funds, and other investments				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**175,773**	**469,084**	**7,756,307**	**44,972,173**	**43,553,317**
Under $25,000 (including deficits)	* 1,163	* 1,669	* 761	* 39,014	* 39,014
$25,000 under $50,000	1,221	1,256	701	768	768
$50,000 under $75,000	4,201	8,326	28,922	749,253	184,697
$75,000 under $100,000	9,043	12,359	32,483	136,048	136,048
$100,000 under $200,000	23,463	63,145	259,477	455,652	455,652
$200,000 under $500,000	55,015	130,159	692,490	2,242,801	2,240,103
$500,000 under $1,000,000	34,872	88,742	600,154	2,305,580	2,285,326
$1,000,000 under $1,500,000	13,830	38,347	354,592	1,547,151	1,545,015
$1,500,000 under $2,000,000	7,606	23,308	269,229	1,317,675	1,317,464
$2,000,000 under $5,000,000	14,647	48,792	969,747	4,502,436	4,414,880
$5,000,000 under $10,000,000	5,648	23,098	887,302	4,077,321	3,592,701
$10,000,000 or more	5,064	29,884	3,660,449	27,598,474	27,341,650

Footnotes at end of Table 1J.

Table 1C. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of real estate, land, and easements				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**11,880**	**14,930**	**4,340,291**	**33,865,469**	**11,832,007**
Under $25,000 (including deficits)	* 14	* 39	* 2,954	* 23,323	* 21,604
$25,000 under $50,000	**	**	**	**	**
$50,000 under $75,000	**	**	**	**	**
$75,000 under $100,000	**	**	**	**	**
$100,000 under $200,000	**1,470	**1,606	**50,068	**117,369	**113,590
$200,000 under $500,000	3,157	3,359	398,278	1,683,309	491,294
$500,000 under $1,000,000	3,506	4,166	1,509,425	10,471,986	4,763,764
$1,000,000 under $1,500,000	1,082	1,789	510,530	6,194,579	930,112
$1,500,000 under $2,000,000	772	1,299	421,624	2,991,968	966,599
$2,000,000 under $5,000,000	1,170	1,608	732,736	5,634,655	1,709,768
$5,000,000 under $10,000,000	406	616	267,890	3,516,975	714,526
$10,000,000 or more	305	449	446,785	3,231,305	2,120,750

Footnotes at end of Table 1J.

Table 1D. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of art and collectibles				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**71,846**	**93,124**	**773,242**	**1,555,983**	**1,401,812**
Under $25,000 (including deficits)	* 1,622	* 1,630	* 158	* 929	* 929
$25,000 under $50,000	* 4,015	* 4,034	* 12,951	* 24,347	* 24,347
$50,000 under $75,000	11,002	17,036	97,770	22,418	22,418
$75,000 under $100,000	14,329	16,951	40,026	32,241	32,241
$100,000 under $200,000	19,638	23,736	66,321	90,103	90,073
$200,000 under $500,000	15,362	20,556	75,950	75,897	75,739
$500,000 under $1,000,000	2,884	3,756	17,692	42,151	38,805
$1,000,000 under $1,500,000	1,104	1,974	10,704	24,359	23,660
$1,500,000 under $2,000,000	557	1,103	44,700	54,677	52,442
$2,000,000 under $5,000,000	834	1,387	55,744	160,533	143,311
$5,000,000 under $10,000,000	280	487	62,878	143,591	98,004
$10,000,000 or more	218	474	288,349	884,736	799,843

Footnotes at end of Table 1J.

Table 1E. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of food				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**105,459**	**188,385**	**100,397**	**122,126**	**118,658**
Under $25,000 (including deficits)	* 1,346	* 1,349	* 50	* 90	* 90
$25,000 under $50,000	* 5,048	* 15,109	* 485	* 1,744	* 1,744
$50,000 under $75,000	8,048	9,051	8,573	5,818	5,818
$75,000 under $100,000	9,503	16,549	5,005	6,128	6,128
$100,000 under $200,000	39,419	80,896	23,639	31,172	31,172
$200,000 under $500,000	32,312	48,804	25,261	23,708	23,660
$500,000 under $1,000,000	6,433	11,778	18,280	9,439	9,401
$1,000,000 under $1,500,000	1,082	1,322	1,445	4,621	4,528
$1,500,000 under $2,000,000	786	1,019	1,153	7,817	7,001
$2,000,000 under $5,000,000	1,018	1,734	7,156	10,011	9,660
$5,000,000 under $10,000,000	271	398	5,012	14,588	12,442
$10,000,000 or more	193	375	4,337	6,989	7,014

Footnotes at end of Table 1J.

Table 1F. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of clothing and accessories				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**2,779,474**	**6,730,508**	**12,971,167**	**6,784,119**	**6,787,279**
Under $25,000 (including deficits)	63,905	102,440	329,171	172,326	172,326
$25,000 under $50,000	193,353	342,276	915,213	536,201	538,889
$50,000 under $75,000	306,638	657,612	1,436,047	852,220	852,220
$75,000 under $100,000	296,801	649,278	1,254,411	730,717	730,717
$100,000 under $200,000	1,032,179	2,674,383	4,497,282	2,473,729	2,474,243
$200,000 under $500,000	696,996	1,845,443	3,306,362	1,562,296	1,562,205
$500,000 under $1,000,000	132,468	334,418	798,437	300,140	300,140
$1,000,000 under $1,500,000	26,805	58,664	198,883	64,623	64,687
$1,500,000 under $2,000,000	11,355	25,768	84,136	27,320	27,305
$2,000,000 under $5,000,000	14,413	31,235	110,879	45,600	45,599
$5,000,000 under $10,000,000	3,060	6,013	27,485	14,569	14,569
$10,000,000 or more	1,501	2,978	12,861	4,379	4,379

Footnotes at end of Table 1J.

Table 1G. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of electronics				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**211,091**	**262,356**	**1,003,410**	**524,249**	**523,565**
Under $25,000 (including deficits)	* 1,042	* 1,073	* 3,903	* 1,115	* 1,115
$25,000 under $50,000	15,448	16,463	78,667	35,920	35,920
$50,000 under $75,000	31,101	40,986	379,878	228,836	228,836
$75,000 under $100,000	21,845	23,857	49,073	26,368	26,368
$100,000 under $200,000	75,779	94,745	261,952	140,543	140,543
$200,000 under $500,000	53,163	69,000	178,050	68,733	68,607
$500,000 under $1,000,000	8,736	10,276	30,119	11,757	11,757
$1,000,000 under $1,500,000	1,939	3,330	8,844	5,083	5,083
$1,500,000 under $2,000,000	709	895	2,736	835	835
$2,000,000 under $5,000,000	1,018	1,350	7,488	4,027	3,469
$5,000,000 under $10,000,000	204	244	1,989	769	769
$10,000,000 or more	106	138	711	263	263

Footnotes at end of Table 1J.

Table 1H. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of household items				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**1,723,760**	**3,741,865**	**10,391,117**	**4,494,537**	**4,480,959**
Under $25,000 (including deficits)	33,433	68,327	207,249	72,105	72,105
$25,000 under $50,000	138,868	267,105	819,068	479,803	479,803
$50,000 under $75,000	185,486	376,371	1,198,442	573,344	568,516
$75,000 under $100,000	188,716	383,135	1,045,383	506,378	506,378
$100,000 under $200,000	628,654	1,432,164	3,674,593	1,510,107	1,511,510
$200,000 under $500,000	420,670	952,053	2,454,502	988,016	981,879
$500,000 under $1,000,000	85,668	174,963	614,444	218,534	216,146
$1,000,000 under $1,500,000	20,414	41,362	155,425	59,094	58,980
$1,500,000 under $2,000,000	8,037	17,073	67,392	28,880	28,435
$2,000,000 under $5,000,000	10,304	22,102	109,750	38,272	38,208
$5,000,000 under $10,000,000	2,249	4,749	29,184	11,173	11,172
$10,000,000 or more	1,260	2,460	15,682	8,831	7,827

Footnotes at end of Table 1J.

Table 1I. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with donations of cars, planes, boats, and other vehicles				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**79,141**	**82,755**	**957,479**	**215,243**	**212,736**
Under $25,000 (including deficits)	* 139	* 140	* 824	* 694	* 694
$25,000 under $50,000	* 3,720	* 3,720	* 8,395	* 9,895	* 9,895
$50,000 under $75,000	* 7,022	* 8,024	* 92,729	* 13,135	* 13,135
$75,000 under $100,000	5,136	5,136	93,440	4,615	4,615
$100,000 under $200,000	31,310	31,456	328,931	42,279	42,279
$200,000 under $500,000	24,473	26,361	252,286	46,744	46,749
$500,000 under $1,000,000	4,749	5,103	77,486	20,643	20,382
$1,000,000 under $1,500,000	1,067	1,188	23,402	5,996	5,869
$1,500,000 under $2,000,000	540	568	18,316	11,912	11,894
$2,000,000 under $5,000,000	657	684	17,921	8,365	8,337
$5,000,000 under $10,000,000	200	210	8,463	9,594	9,519
$10,000,000 or more	128	164	35,288	41,370	39,368

Footnotes at end of Table 1J.

Table 1J. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Returns with other donations [4]				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**497,117**	**962,976**	**2,352,788**	**3,968,292**	**3,908,883**
Under $25,000 (including deficits)	12,265	20,605	39,296	23,415	23,415
$25,000 under $50,000	**	**	**	**	**
$50,000 under $75,000	**	**	**	**	**
$75,000 under $100,000	**	**	**	**	**
$100,000 under $200,000	**296,808	**620,409	**1,141,593	**663,609	**663,609
$200,000 under $500,000	129,799	227,154	512,635	623,404	595,586
$500,000 under $1,000,000	32,962	53,782	267,651	636,035	635,361
$1,000,000 under $1,500,000	9,585	16,472	80,105	289,641	278,866
$1,500,000 under $2,000,000	4,278	6,828	16,746	210,117	207,035
$2,000,000 under $5,000,000	7,154	10,848	150,529	491,758	481,385
$5,000,000 under $10,000,000	2,372	3,669	44,174	266,153	265,569
$10,000,000 or more	1,893	3,209	100,057	764,159	758,058

* Estimate should be used with caution due to the small number of sample returns on which it is based.
** Data combined to avoid disclosure of information for specific taxpayers.
[1] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.
[2] Not every donation has a donor cost reported.
[3] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
[4] Other donations includes intellectual property, services, airline tickets and miles, and other donations.
NOTE: This table is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Table 2A. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	All donees				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**3,907,728**	**12,545,983**	**40,646,197**	**96,502,191**	**72,819,215**
Under $25,000 (including deficits)	82,594	197,271	584,367	333,012	331,294
$25,000 under $50,000	279,964	713,270	1,998,208	1,203,002	1,205,690
$50,000 under $75,000	425,958	1,206,281	3,441,908	2,572,342	2,002,958
$75,000 under $100,000	413,731	1,223,977	2,747,700	1,553,604	1,553,487
$100,000 under $200,000	1,399,027	4,753,647	9,713,703	5,171,812	5,170,037
$200,000 under $500,000	968,835	3,322,891	7,895,814	7,314,908	6,085,823
$500,000 under $1,000,000	211,140	686,983	3,933,689	14,016,265	8,281,080
$1,000,000 under $1,500,000	51,431	164,448	1,343,931	8,195,147	2,916,800
$1,500,000 under $2,000,000	23,043	77,861	926,031	4,651,200	2,619,008
$2,000,000 under $5,000,000	34,524	119,740	2,161,950	10,895,659	6,854,617
$5,000,000 under $10,000,000	10,008	39,484	1,334,378	8,054,733	4,719,272
$10,000,000 or more	7,473	40,131	4,564,518	32,540,506	31,079,150

Footnotes at end of Table 2K.

Table 2B. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Arts, culture, and humanities				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**113,644**	**172,291**	**986,420**	**4,200,982**	**2,378,833**
Under $25,000 (including deficits)	* 3,011	* 3,018	* 1,869	* 720	* 720
$25,000 under $50,000	* 7,591	* 8,593	* 6,638	* 34,921	* 34,921
$50,000 under $75,000	7,259	7,265	7,637	4,378	4,378
$75,000 under $100,000	11,426	18,882	34,982	11,454	11,454
$100,000 under $200,000	38,137	50,350	88,595	102,390	102,360
$200,000 under $500,000	30,301	58,971	132,880	134,819	134,664
$500,000 under $1,000,000	8,756	11,470	132,523	1,206,589	137,997
$1,000,000 under $1,500,000	2,423	4,027	15,949	48,422	49,140
$1,500,000 under $2,000,000	1,466	2,674	150,394	747,747	116,738
$2,000,000 under $5,000,000	2,050	3,674	64,325	204,037	188,273
$5,000,000 under $10,000,000	647	1,448	51,942	176,569	168,840
$10,000,000 or more	578	1,920	298,685	1,528,936	1,429,348

Footnotes at end of Table 2K.

Table 2C. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Educational institutions				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**158,895**	**272,376**	**1,361,241**	**4,515,256**	**4,287,689**
Under $25,000 (including deficits)	* 322	* 877	* 1,511	* 1,438	* 1,438
$25,000 under $50,000	* 6,032	* 6,046	* 13,873	* 6,759	* 6,759
$50,000 under $75,000	13,246	18,320	142,211	189,121	180,835
$75,000 under $100,000	11,391	16,555	25,838	35,859	35,743
$100,000 under $200,000	50,219	93,079	124,477	110,272	108,869
$200,000 under $500,000	46,287	78,825	202,314	517,491	487,048
$500,000 under $1,000,000	15,612	26,943	74,581	310,440	309,613
$1,000,000 under $1,500,000	5,063	8,001	73,502	230,236	210,957
$1,500,000 under $2,000,000	2,757	5,245	43,451	144,415	135,519
$2,000,000 under $5,000,000	4,829	10,107	256,030	759,754	646,200
$5,000,000 under $10,000,000	1,734	4,261	154,095	565,257	559,824
$10,000,000 or more	1,403	4,117	249,357	1,644,213	1,604,885

Footnotes at end of Table 2K.

Table 2D. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Environment- and animal-related organizations				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**104,308**	**192,403**	**3,428,710**	**29,376,144**	**9,871,504**
Under $25,000 (including deficits)	5,373	5,443	1,136	22,782	22,782
$25,000 under $50,000	* 4,126	* 17,158	* 22,724	* 19,769	* 19,769
$50,000 under $75,000	9,032	11,015	18,139	6,482	6,482
$75,000 under $100,000	8,001	28,033	9,300	9,762	9,762
$100,000 under $200,000	33,490	53,341	45,350	118,369	117,069
$200,000 under $500,000	30,770	57,331	338,748	1,251,840	195,133
$500,000 under $1,000,000	7,127	10,406	1,336,454	8,715,041	4,335,378
$1,000,000 under $1,500,000	2,202	2,890	410,011	5,911,010	751,562
$1,500,000 under $2,000,000	1,398	2,274	181,528	1,984,444	800,391
$2,000,000 under $5,000,000	1,841	2,701	538,505	5,087,983	1,435,240
$5,000,000 under $10,000,000	516	786	208,446	3,418,921	466,399
$10,000,000 or more	433	1,026	318,369	2,829,742	1,711,538

Footnotes at end of Table 2K.

Table 2E. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Health and medical research				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**365,641**	**710,025**	**1,698,188**	**1,670,306**	**1,668,695**
Under $25,000 (including deficits)	4,018	4,435	10,422	3,680	3,680
$25,000 under $50,000	30,591	46,680	124,378	75,316	75,316
$50,000 under $75,000	43,191	69,301	225,852	126,091	126,091
$75,000 under $100,000	37,659	67,254	131,634	62,427	62,427
$100,000 under $200,000	131,602	280,040	564,123	251,437	251,437
$200,000 under $500,000	87,714	182,995	346,171	299,475	299,475
$500,000 under $1,000,000	19,929	41,149	109,761	91,640	91,640
$1,000,000 under $1,500,000	4,366	6,514	28,043	50,431	50,304
$1,500,000 under $2,000,000	2,062	3,287	15,886	50,865	50,865
$2,000,000 under $5,000,000	3,101	5,513	35,868	138,130	138,130
$5,000,000 under $10,000,000	806	1,615	31,672	123,958	123,450
$10,000,000 or more	604	1,241	74,377	396,857	395,880

Footnotes at end of Table 2K.

Table 2F. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Large organizations				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**3,056,904**	**8,102,703**	**19,472,185**	**9,414,341**	**9,407,565**
Under $25,000 (including deficits)	64,214	132,930	447,000	210,345	210,345
$25,000 under $50,000	220,792	425,876	1,344,044	780,894	783,602
$50,000 under $75,000	337,661	817,316	2,326,671	1,213,597	1,208,769
$75,000 under $100,000	318,269	829,676	1,976,173	990,171	990,171
$100,000 under $200,000	1,133,511	3,212,067	6,638,788	3,245,287	3,247,205
$200,000 under $500,000	764,544	2,132,530	4,777,556	2,057,634	2,051,402
$500,000 under $1,000,000	150,025	386,711	1,278,628	483,123	483,123
$1,000,000 under $1,500,000	32,800	82,566	293,613	123,046	123,296
$1,500,000 under $2,000,000	12,831	31,266	110,416	55,446	55,172
$2,000,000 under $5,000,000	16,775	39,823	202,745	109,690	109,670
$5,000,000 under $10,000,000	3,620	7,953	46,775	41,838	41,769
$10,000,000 or more	1,861	3,990	29,777	103,272	103,042

Footnotes at end of Table 2K.

Table 2G. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Public and societal benefit				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**695,171**	**1,386,763**	**3,423,538**	**3,667,206**	**3,143,012**
Under $25,000 (including deficits)	11,861	24,275	45,483	25,582	25,582
$25,000 under $50,000	50,399	105,933	211,051	141,126	141,126
$50,000 under $75,000	70,660	154,903	286,265	159,114	159,114
$75,000 under $100,000	67,513	100,731	271,845	138,147	138,147
$100,000 under $200,000	245,190	516,662	912,807	492,387	492,387
$200,000 under $500,000	185,029	365,932	879,714	596,191	595,749
$500,000 under $1,000,000	39,871	73,198	242,380	369,850	167,021
$1,000,000 under $1,500,000	9,802	17,156	121,062	246,540	155,681
$1,500,000 under $2,000,000	5,171	9,475	162,449	400,475	230,013
$2,000,000 under $5,000,000	6,756	12,655	119,819	373,147	326,780
$5,000,000 under $10,000,000	1,713	3,186	54,549	141,290	134,967
$10,000,000 or more	1,206	2,655	116,114	583,358	576,447

Footnotes at end of Table 2K.

Table 2H. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Religious organizations				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**548,291**	**1,169,405**	**2,961,772**	**3,362,779**	**3,412,017**
Under $25,000 (including deficits)	14,756	21,951	68,576	59,263	59,263
$25,000 under $50,000	30,451	76,013	198,939	78,202	78,202
$50,000 under $75,000	52,527	99,303	359,529	165,358	165,358
$75,000 under $100,000	59,259	141,383	160,122	200,958	200,958
$100,000 under $200,000	193,541	415,122	898,356	470,486	470,486
$200,000 under $500,000	150,459	312,681	607,811	621,215	620,998
$500,000 under $1,000,000	29,076	66,489	197,917	362,801	349,718
$1,000,000 under $1,500,000	7,794	14,092	66,862	184,251	184,251
$1,500,000 under $2,000,000	3,367	6,555	69,255	210,000	208,920
$2,000,000 under $5,000,000	4,984	10,564	119,741	345,859	325,306
$5,000,000 under $10,000,000	1,287	3,137	81,319	249,489	241,836
$10,000,000 or more	790	2,116	133,344	414,898	506,721

Footnotes at end of Table 2K.

Table 2I. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Donor-advised funds				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**73,060**	**168,478**	**2,883,400**	**14,911,826**	**14,272,741**
Under $25,000 (including deficits)	* 34	* 65	* 2	* 675	* 675
$25,000 under $50,000	0	0	0	0	0
$50,000 under $75,000	* 3,032	* 4,010	* 15,691	* 660,967	* 104,697
$75,000 under $100,000	* 2,426	* 2,454	* 16,200	* 67,315	* 67,315
$100,000 under $200,000	9,094	28,806	182,838	173,933	173,933
$200,000 under $500,000	21,668	41,383	243,676	783,671	783,671
$500,000 under $1,000,000	15,756	32,327	262,970	1,031,253	1,032,211
$1,000,000 under $1,500,000	6,069	13,413	133,532	553,140	550,319
$1,500,000 under $2,000,000	3,533	8,639	113,396	539,908	506,091
$2,000,000 under $5,000,000	6,667	17,733	364,586	1,828,100	1,824,306
$5,000,000 under $10,000,000	2,486	8,220	253,978	1,283,500	1,260,186
$10,000,000 or more	2,295	11,430	1,296,530	7,989,364	7,969,336

Footnotes at end of Table 2K.

Table 2J. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Foundations				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**60,386**	**103,489**	**3,304,639**	**20,856,796**	**20,084,782**
Under $25,000 (including deficits)	**1,048	**1,106	**5,895	**5,788	**4,070
$25,000 under $50,000	**	**	**	**	**
$50,000 under $75,000	* 2,359	* 5,152	* 11,907	* 4,564	* 4,564
$75,000 under $100,000	* 4,346	* 6,357	* 32,553	* 22,096	* 22,096
$100,000 under $200,000	17,881	20,286	44,332	23,138	23,017
$200,000 under $500,000	16,091	22,508	124,747	327,711	327,711
$500,000 under $1,000,000	6,736	10,944	194,262	667,822	605,225
$1,000,000 under $1,500,000	3,246	8,846	153,549	537,046	530,459
$1,500,000 under $2,000,000	1,612	4,124	45,577	253,626	253,030
$2,000,000 under $5,000,000	3,613	9,837	389,512	1,459,395	1,305,869
$5,000,000 under $10,000,000	1,607	5,261	398,392	1,643,298	1,334,755
$10,000,000 or more	1,847	9,067	1,903,913	15,912,311	15,673,987

Footnotes at end of Table 2K.

Table 2K. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Size of Adjusted Gross Income, Tax Year 2019

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

Size of adjusted gross income	Other donees				
	Number of returns [1]	Number of donations	Donor's cost [2]	Fair market value	Amount carried to Schedule A [3]
	(1)	(2)	(3)	(4)	(5)
All returns	**185,752**	**268,049**	**1,126,105**	**4,526,554**	**4,292,378**
Under $25,000 (including deficits)	**20,077	**30,144	**79,035	**68,755	**68,735
$25,000 under $50,000	**	**	**	**	**
$50,000 under $75,000	16,791	19,695	48,006	42,670	42,670
$75,000 under $100,000	10,641	12,652	89,054	15,414	15,414
$100,000 under $200,000	54,705	83,895	214,037	184,111	183,274
$200,000 under $500,000	49,504	69,735	242,197	724,860	589,973
$500,000 under $1,000,000	17,932	27,345	104,211	777,708	769,155
$1,000,000 under $1,500,000	4,954	6,942	47,808	311,025	310,832
$1,500,000 under $2,000,000	2,872	4,323	33,677	264,276	262,270
$2,000,000 under $5,000,000	4,979	7,133	70,817	589,564	554,843
$5,000,000 under $10,000,000	1,750	3,617	53,211	410,613	387,246
$10,000,000 or more	1,547	2,569	144,052	1,137,557	1,107,967

* Estimate should be used with caution due to the small number of sample returns on which it is based.
** Data combined to avoid disclosure of information for specific taxpayers.
[1] Total number of returns does not equal the sum of returns by donee type because a return could have more than one type of donee.
[2] Not every donation has a donor cost reported.
[3] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTE: This table is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Table 3. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Selected Donee Type, Tax Year 2019

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

Type of donation	All donees		Arts, culture, and humanities		Educational institutions	
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(1)	(2)	(3)	(4)	(5)	(6)
All donations	**12,545,983**	**72,819,215**	**172,291**	**2,378,833**	**272,376**	**4,287,689**
Corporate stock, mutual funds, and other investments	469,084	43,553,317	13,580	911,121	67,571	3,630,290
Real estate, land, and easements	14,930	11,832,007	1,577	309,534	330	208,564
Art and collectibles	93,124	1,401,812	12,290	1,043,438	5,994	105,357
Food	188,385	118,658	3,869	4,355	6,810	2,467
Clothing and accessories	6,730,508	6,787,279	23,649	6,553	55,255	42,283
Electronics	262,356	523,565	4,578	7,341	9,348	131,800
Household items	3,741,865	4,480,959	83,343	59,586	51,659	58,241
Cars, planes, boats, and other vehicles	82,755	212,736	5,368	12,557	2,749	10,707
Other [2]	962,976	3,908,883	24,037	24,347	72,661	97,980

Type of donation	Environment- and animal-related organizations		Health and medical research		Large organizations	
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(7)	(8)	(9)	(10)	(11)	(12)
All donations	**192,403**	**9,871,504**	**710,025**	**1,668,695**	**8,102,703**	**9,407,565**
Corporate stock, mutual funds, and other investments	14,387	672,699	16,516	816,681	23,049	262,896
Real estate, land, and easements	7,202	8,973,749	179	149,014	77	11,731
Art and collectibles	2,631	10,476	4,476	4,232	43,654	72,985
Food	7,931	6,262	7,775	1,744	12,287	10,763
Clothing and accessories	49,536	29,000	437,467	392,491	4,874,927	5,063,699
Electronics	3,244	3,192	18,826	38,246	184,832	281,361
Household items	49,122	24,915	185,895	200,252	2,505,742	3,140,430
Cars, planes, boats, and other vehicles	980	11,236	9,016	17,779	19,626	20,388
Other [2]	57,371	139,976	29,876	48,256	438,509	543,312

Footnotes at end of table.

Table 3. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Selected Donee Type, Tax Year 2019—Continued

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

Type of donation	Public and societal benefit		Religious organizations		Foundations	
	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]	Number of donations	Amount carried to Schedule A [1]
	(13)	(14)	(15)	(16)	(17)	(18)
All donations	**1,386,763**	**3,143,012**	**1,169,405**	**3,412,017**	**103,489**	**20,084,782**
Corporate stock, mutual funds, and other investments	22,178	1,082,681	83,564	1,966,092	51,285	19,085,732
Real estate, land, and easements	1,692	607,818	1,636	296,620	735	748,030
Art and collectibles	11,139	29,896	11,123	66,228	523	61,528
Food	61,803	44,007	82,216	28,890	2,034	2,150
Clothing and accessories	701,286	639,929	493,172	477,206	22,153	38,647
Electronics	16,775	7,546	18,764	40,894	* 633	* 1,084
Household items	440,121	461,009	358,309	391,266	12,768	10,570
Cars, planes, boats, and other vehicles	27,475	81,867	10,246	28,584	* 5,222	* 13,180
Other [2]	104,295	188,259	110,376	116,238	8,135	123,861

Type of donation	Other donees [3]	
	Number of donations	Amount carried to Schedule A [1]
	(19)	(20)
All donations	**436,527**	**18,565,119**
Corporate stock, mutual funds, and other investments	176,954	15,125,125
Real estate, land, and easements	1,503	526,947
Art and collectibles	1,295	7,672
Food	3,659	18,020
Clothing and accessories	73,064	97,470
Electronics	5,356	12,101
Household items	54,906	134,690
Cars, planes, boats, and other vehicles	2,073	16,438
Other [2]	117,717	2,626,655

* Estimate should be used with caution due to the small number of sample returns on which it is based.
[1] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
[2] "Other" includes intellectual property, services, airline tickets and miles, and other donations.
[3] Other donees includes donor-advised funds. These funds are shown separately in Table 2.
NOTE: This table is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Table 4. All Individual Returns with Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Donor Age, Tax Year 2019

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

Donor age [1]	All returns							
	Form 8283				Schedule A			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns with contributions	Amount of contributions	Number of returns with cash contributions	Amount of cash contributions
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All ages	**3,907,728**	**12,545,983**	**96,502,191**	**72,819,215**	**3,907,728**	**72,819,215**	**3,380,381**	**35,931,944**
Under 35	254,660	611,852	3,607,427	1,776,606	254,660	1,776,606	196,871	966,203
35 under 45	750,324	2,061,233	11,388,743	7,614,123	750,324	7,614,123	607,793	3,775,421
45 under 55	1,068,781	3,481,937	29,126,191	16,161,553	1,068,781	16,161,553	922,035	7,690,999
55 under 65	1,027,858	3,384,798	23,692,862	22,334,979	1,027,858	22,334,979	901,643	10,252,605
65 and older	806,105	3,006,163	28,686,968	24,931,954	806,105	24,931,954	752,038	13,246,716

Donor age [1]	Corporate stock, mutual funds, and other investments				Real estate, land, and easements			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All ages	**175,773**	**469,084**	**44,972,173**	**43,553,317**	**11,880**	**14,930**	**33,865,469**	**11,832,007**
Under 35	1,945	5,405	447,192	405,914	513	619	2,067,533	278,029
35 under 45	14,891	57,012	2,890,387	2,841,348	2,307	2,471	5,252,283	1,530,502
45 under 55	27,479	85,180	6,932,309	6,581,336	2,368	3,156	17,777,887	5,194,021
55 under 65	53,221	124,591	16,197,366	16,142,430	3,268	4,497	3,385,117	2,149,729
65 and older	78,238	196,896	18,504,921	17,582,288	3,423	4,189	5,382,649	2,679,726

Donor age [1]	Art and collectibles				Food			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All ages	**71,846**	**93,124**	**1,555,983**	**1,401,812**	**105,459**	**188,385**	**122,126**	**118,658**
Under 35	* 4,022	* 4,027	* 9,198	* 9,198	* 1,884	* 2,029	* 3,626	* 3,585
35 under 45	7,441	7,479	31,799	31,462	11,420	17,482	10,811	10,451
45 under 55	15,962	17,047	57,016	56,986	20,374	25,671	22,379	22,262
55 under 65	12,559	16,729	236,224	192,995	29,890	45,432	36,009	33,686
65 and older	31,862	47,843	1,221,746	1,111,171	41,891	97,771	49,300	48,673

Footnotes at end of table.

Table 4. All Individual Returns with Noncash Charitable Contributions Reported on Form 8283, by Donation Type and Donor Age, Tax Year 2019—Continued

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

Donor age [1]	Clothing and accessories				Electronics			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All ages	**2,779,474**	**6,730,508**	**6,784,119**	**6,787,279**	**211,091**	**262,356**	**524,249**	**523,565**
Under 35	185,831	331,444	554,612	554,612	11,592	13,215	25,215	25,215
35 under 45	564,666	1,191,084	1,434,236	1,434,236	46,026	51,917	216,101	216,101
45 under 55	782,207	2,018,312	1,932,645	1,932,881	63,679	81,151	124,034	123,476
55 under 65	711,774	1,800,972	1,735,169	1,737,857	48,087	63,653	56,569	56,569
65 and older	534,996	1,388,697	1,127,457	1,127,694	41,708	52,421	102,329	102,203

Donor age [1]	Household items				Cars, planes, boats, and other vehicles			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All ages	**1,723,760**	**3,741,865**	**4,494,537**	**4,480,959**	**79,141**	**82,755**	**215,243**	**212,736**
Under 35	108,849	188,408	319,586	319,586	* 4,579	* 4,719	* 8,173	* 8,173
35 under 45	296,296	576,223	823,168	820,181	11,585	11,586	17,657	17,616
45 under 55	469,768	987,935	1,176,442	1,176,077	20,237	22,521	41,048	40,921
55 under 65	458,846	1,020,181	1,155,735	1,147,446	25,969	26,628	65,829	65,424
65 and older	390,001	969,118	1,019,606	1,017,668	16,771	17,301	82,535	80,601

Donor age [1]	Other donations [4]			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(41)	(42)	(43)	(44)
All ages	**497,117**	**962,976**	**3,968,292**	**3,908,883**
Under 35	26,831	61,985	172,294	172,294
35 under 45	70,867	145,981	712,301	712,224
45 under 55	125,696	240,966	1,062,430	1,033,592
55 under 65	135,583	282,116	824,843	808,842
65 and older	138,140	231,928	1,196,424	1,181,931

* Estimate should be used with caution due to the small number of sample returns on which it is based.
[1] Age for joint returns was based on the primary taxpayer's age.
[2] Total number of returns does not equal the sum of returns by donation type because a return could have more than one type of donation.
[3] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
[4] Other donations includes intellectual property, services, airline tickets and miles, and other donations.
NOTE: This table is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Table 5. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Donor Age, Tax Year 2019

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

Donor age [1]	All donees							
	Form 8283				Schedule A			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns with contributions	Amount of contributions	Number of returns with cash contributions	Amount of cash contributions
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)
All ages	**3,907,728**	**12,545,983**	**96,502,191**	**72,819,215**	**3,907,728**	**72,819,215**	**3,380,381**	**35,931,944**
Under 35	254,660	611,852	3,607,427	1,776,606	254,660	1,776,606	196,871	966,203
35 under 45	750,324	2,061,233	11,388,743	7,614,123	750,324	7,614,123	607,793	3,775,421
45 under 55	1,068,781	3,481,937	29,126,191	16,161,553	1,068,781	16,161,553	922,035	7,690,999
55 under 65	1,027,858	3,384,798	23,692,862	22,334,979	1,027,858	22,334,979	901,643	10,252,605
65 and older	806,105	3,006,163	28,686,968	24,931,954	806,105	24,931,954	752,038	13,246,716

Donor age [1]	Arts, culture, and humanities				Educational institutions			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(9)	(10)	(11)	(12)	(13)	(14)	(15)	(16)
All ages	**113,644**	**172,291**	**4,200,982**	**2,378,833**	**158,895**	**272,376**	**4,515,256**	**4,287,689**
Under 35	2,536	2,613	20,660	20,660	2,638	2,711	32,456	23,403
35 under 45	7,796	20,762	95,271	93,056	22,585	31,620	312,172	227,343
45 under 55	16,761	20,033	1,943,484	208,723	30,943	52,854	420,907	388,213
55 under 65	26,243	35,847	504,707	493,791	44,963	94,058	1,161,865	1,110,379
65 and older	60,308	93,036	1,636,861	1,562,603	57,766	91,133	2,587,855	2,538,351

Donor age [1]	Environment- and animal-related organizations				Health and medical research			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)
All ages	**104,308**	**192,403**	**29,376,144**	**9,871,504**	**365,641**	**710,025**	**1,670,306**	**1,668,695**
Under 35	3,110	6,078	2,046,076	257,733	10,364	11,165	45,642	45,642
35 under 45	18,119	29,138	4,978,590	1,373,560	54,809	98,503	193,935	193,935
45 under 55	26,925	40,362	15,901,472	4,760,729	95,508	191,312	225,372	224,637
55 under 65	26,477	57,057	2,884,719	1,807,841	104,169	236,344	294,810	294,803
65 and older	29,676	59,768	3,565,287	1,671,641	100,792	172,701	910,548	909,679

Footnotes at end of table.

Table 5. All Individual Returns With Noncash Charitable Contributions Reported on Form 8283, by Donee Type and Donor Age, Tax Year 2019—Continued

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

Donor age [1]	Large organizations				Public and societal benefit			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(25)	(26)	(27)	(28)	(29)	(30)	(31)	(32)
All ages	**3,056,904**	**8,102,703**	**9,414,341**	**9,407,565**	**695,171**	**1,386,763**	**3,667,206**	**3,143,012**
Under 35	221,416	484,114	841,760	841,760	30,350	50,715	97,056	96,866
35 under 45	594,536	1,456,197	1,862,782	1,859,800	122,064	204,981	417,907	387,839
45 under 55	866,301	2,481,037	2,668,800	2,668,902	173,480	331,001	719,176	710,699
55 under 65	806,229	2,129,751	2,366,270	2,360,972	189,261	373,157	760,483	709,530
65 and older	568,423	1,551,604	1,674,730	1,676,131	180,016	426,909	1,672,584	1,238,078

Donor age [1]	Religious organizations				Donor-advised funds			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)
All ages	**548,291**	**1,169,405**	**3,362,779**	**3,412,017**	**73,060**	**168,478**	**14,911,826**	**14,272,741**
Under 35	16,821	27,291	59,066	58,975	1,331	3,504	136,293	136,293
35 under 45	69,150	138,763	347,523	347,523	4,940	26,786	779,436	773,744
45 under 55	123,594	243,027	526,289	508,181	14,155	33,915	2,607,564	2,604,768
55 under 65	152,135	310,508	770,889	767,065	28,786	58,449	5,989,039	5,942,538
65 and older	186,591	449,817	1,659,012	1,730,274	23,848	45,824	5,399,494	4,815,398

Donor age [1]	Foundations				Other donees			
	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]	Number of returns [2]	Number of donations	Fair market value	Amount carried to Schedule A [3]
	(41)	(42)	(43)	(44)	(45)	(46)	(47)	(48)
All ages	**60,386**	**103,489**	**20,856,796**	**20,084,782**	**185,752**	**268,049**	**4,526,554**	**4,292,378**
Under 35	1,542	2,063	201,424	168,280	16,031	21,600	126,995	126,995
35 under 45	8,522	10,851	1,716,404	1,673,542	33,777	43,631	684,723	683,782
45 under 55	10,231	15,707	3,084,542	3,067,572	42,497	72,689	1,028,585	1,019,129
55 under 65	15,663	29,452	8,090,773	7,994,933	45,148	60,174	869,308	853,128
65 and older	24,427	45,417	7,763,653	7,180,456	48,299	69,955	1,816,943	1,609,345

[1] Age for joint returns was based on the primary taxpayer's age.
[2] Total number of returns does not equal the sum of returns by donee type because a return could have more than one type of donee.
[3] Amount carried to Schedule A is the fair market value from Section A (items with a deduction of $5,000 or less, and all publicly traded securities) plus the lesser of the fair market value, the amount claimed, or the appraised value on Section B (items with a deduction of more than $5,000).
NOTE: This table is based on data reported on Form 1040, *U.S. Individual Income Tax Return;* Schedule A, *Itemized Deductions;* and Form 8283, *Noncash Charitable Contributions.*
SOURCE: IRS, Statistics of Income Division, Noncash Charitable Contributions, May 2022.

Corporate Foreign Tax Credit, Tax Year 2018

by Melissa Costa

For Tax Year 2018, over 9,800 corporations reported almost $768 billion of foreign-source taxable income and claimed a foreign tax credit totaling over $103 billion. For these corporations, the foreign tax credit reduced their regular U.S. income tax liability by nearly a third, from $319 billion to $216 billion. In comparison, for Tax Year 2017, around 6,900 corporations reported foreign-source taxable income of $272 billion and a total foreign tax credit of $60.3 billion. Much of the increase in these metrics was due to new provisions in the Tax Cuts and Jobs Act (TCJA)[1] enacted on December 22, 2017, such as the Internal Revenue Code (IRC) section 965 transition tax, as well as differences in the requirements for reporting these provisions on the form used to compute the foreign tax credit.

Prior to the TCJA, the United States taxed U.S. persons, including domestic corporations, on their worldwide income but generally allowed U.S shareholders of foreign corporations to defer U.S. tax on their share of foreign corporations' accumulated earnings and profits (E&P) until these were distributed as dividends to the shareholder. After the passage of the TCJA, domestic corporations can deduct 100 percent of dividends received from foreign corporations, provided they own at least 10 percent of the vote or value of the stock of the foreign corporation. However, the IRC Subpart F provisions still apply. The Subpart F rules require that U.S. shareholders who own 10 percent or more of a controlled foreign corporation (CFC) (see Explanation of Selected Terms) include in their taxable income certain types of income from their CFCs. The types of income that fall under Subpart F rules are traditionally subject to low foreign taxation rates and can be easily moved between tax jurisdictions.

In addition, the TCJA introduced two new provisions that tax CFC earnings. The revised IRC section 965 provisions generally subject to tax a portion of the corporation's pro rata share of the untaxed E&P from specified foreign corporations (SFCs) (see Explanation of Selected Terms) accumulated after 1986 but before certain dates related to the passage of the TCJA. The pro rata share of the untaxed E&P is known as the section 965 inclusion. U.S shareholders included the section 965 inclusion with their gross income for Tax Year 2017 and/or Tax Year 2018, depending on the accounting period of the U.S shareholder and that of their SFCs. They also included gross income under IRC section 78[2] (dividend gross-up), but first reduced it by a percentage generally corresponding to the section 965 deduction (see Explanation of Selected Terms). Taxpayers are allowed a section 965 deduction that results in a tax rate between 8 and 15.5 percent, depending on the portion of their section 965 inclusion related to their cash assets.[3] The TCJA also added a new global intangible low-taxed income (GILTI) provision, which requires U.S. shareholders to include in their gross income certain CFC income that is non-Subpart F. This requirement seeks to prevent taxpayers from shifting income in excess of a 10 percent return on tangible assets to CFCs in low-tax jurisdictions. Taxpayers may deduct 50 percent of their GILTI inclusion and related dividend gross-up, as long as the GILTI deduction, once combined with the new deduction related to foreign derived intangible income (FDII), does not exceed the domestic corporation's taxable income.[4]

As was the case for pre-2018 corporate tax years, to relieve double taxation, taxpayers may claim a foreign tax credit for taxes paid or accrued to other countries. The foreign tax credit includes a limitation to prevent taxpayers from crediting foreign taxes paid or accrued in excess of the amount of U.S. tax for the current tax year that would have otherwise been owed on the taxpayer's foreign-source income. Since the TCJA lowered the top tax rate for corporations from 35 percent to 21 percent, the limitation on foreign taxes eligible for credit is likewise reduced. This limitation is computed separately for each of the income types in the foreign tax credit provisions. For example, taxpayers compute a separate limitation for passive income. This limits

Highlights:

- Together, taxable income from the GILTI and section 965 provisions of the TCJA were responsible for two-thirds of foreign-source taxable income for corporations with a foreign tax credit for Tax Year 2018.
- Much of the increase in reported foreign-source taxable income and foreign tax credit between Tax Year 2017 and Tax Year 2018 was due to the difference in reporting requirements for section 965, a one-time provision that applied mostly to Tax Years 2017 and 2018.
- Pharmaceutical and medicine manufacturing comprised 23 percent of the foreign-source taxable income and 14 percent of the foreign tax credit.

[1] Formally, "An Act to Provide for Reconciliation Pursuant to Titles II and V of the Concurrent Resolution on the Budget for Fiscal Year 2018" (P.L 115-97).
[2] The section 965 inclusion is generally "grossed up" by the taxes deemed paid.
[3] For more on the section 965 provisions, see Melissa Costa and Bernard Quinn, "Section 965 Inclusion and Net Tax Liability, Tax Years 2017 and 2018," *Statistics of Income Bulletin*, Fall 2021, Volume 41, Number 2.
[4] For more on the GILTI and FDII provisions, see Chloe Gagin, Nuria McGrath, and Jeffrey Yan, "Global Intangible Low-Taxed Income and the Section 250 Deduction, Tax Year 2018," *Statistics of Income Bulletin*, Fall 2021, Volume 41, Number 2.

the ability to use the foreign taxes paid on nonpassive income to offset the U.S. tax owed on passive income, which is typically subject to lower tax rates. Taxpayers also compute a separate limitation for certain income related to tax treaties and for income from sanctioned countries under IRC section 901(j) (see Explanation of Selected Terms). The TCJA added two new categories of income, GILTI and foreign branch. GILTI inclusion generally falls into the GILTI category, but sometimes belongs in the passive income or tax treaty category. Section 965 inclusion mainly falls into the general limitation income category but could also be reported in the passive income or tax treaty category.

The taxes deemed paid[5] on both the GILTI inclusion and the section 965 inclusion are eligible for the foreign tax credit, subject to the foreign tax credit limitation. However, taxes deemed paid on section 965 inclusion must first be reduced by a percentage generally corresponding to the section 965 deduction (reported as the section 965 reduction on Form 1118, *Foreign Tax Credit—Corporations*) while the GILTI provisions limit the foreign tax credit to 80 percent of the total tax deemed paid, with no carryback or carryover of taxes permitted.

Corporations claiming the foreign tax credit report their foreign-source gross income, deductions, and taxes on Form 1118. Although the section 965 provisions applied to both Tax Years 2017 and 2018, taxpayers were only required to report applicable section 965 amounts on Form 1118 if their accounting periods ended on or after December 31, 2018. For Tax Year 2017 returns and Tax Year 2018 returns with early accounting periods, i.e., those of fiscal year filers, taxpayers computed their foreign tax credit with section 965 amounts separately and used it in the computation of their net section 965 tax liability (see Explanation of Selected Terms). Therefore, section 965 statistics in this article differ substantially from previously published data from the Statistics of Income (SOI) Form 965 study.[6] GILTI provisions, on the other hand, only applied to taxpayers with accounting periods ending on or after December 31, 2018, and thus were not applicable for Tax Year 2017.

For Tax Year 2018, for corporations claiming the foreign tax credit, foreign-source taxable income related to the section 965 and GILTI provisions amounted to $508 billion and accounted for two-thirds of their total foreign-source taxable income of $768 billion. These corporations reported a total foreign-source gross income of $1.7 trillion, of which section 965 inclusion and dividend gross-up comprised $644 billion (38 percent) while total gross income related to the GILTI provisions made up another $375 billion (22 percent). Taxpayers were able to deduct almost $285 billion due to the section 965 provisions, while their total GILTI deduction came to $185 billion. Total taxes deemed paid on section 965 inclusion, before the section 965 reduction, totaled $74 billion while total taxes deemed paid on the GILTI inclusion, which are reported after applying the 80 percent limit, amounted to almost $38 billion. Together, taxes deemed paid on income related to GILTI and section 965 came to 87 percent of the total $128 billion of taxes deemed paid reported (Figure A). However, the section 965 reduction lowered the total taxes available for credit by $48 billion.

Geographic Spotlight

Per the instructions for Form 1118, taxpayers were not required to report the country of origin for section 965 and GILTI inclusions. Corporations claiming a foreign tax credit reported a total of $343 billion of foreign-source taxable income from section 965, nearly 45 percent of the total ($768 billion). They claimed $165 billion (21 percent) from the GILTI provisions. European countries accounted for another $90 billion (12 percent), while Asian countries tallied $46 billion (6 percent) (see Figure B). Of the five countries with the largest shares of foreign-source taxable income—Ireland (2.3 percent, $17.7 billion), Switzerland

Figure A

U.S. Corporation Returns with a Foreign Tax Credit, Tax Year 2018: Foreign Income, Selected Deductions, and Taxes Deemed Paid, by Specific Income Sources

[Money amounts in thousands of dollars]

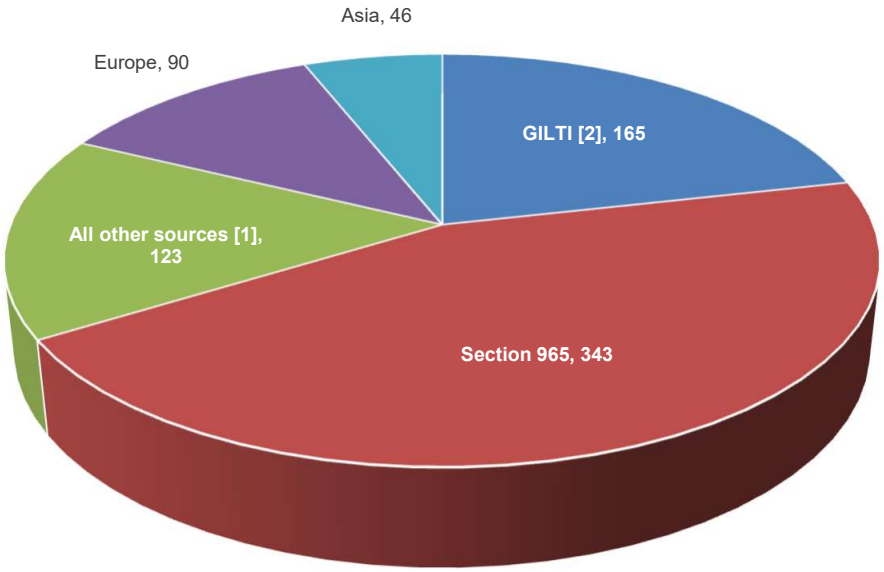
Source	Number of returns [1]	Foreign-source gross income (less loss)	Section 965 deduction	GILTI deduction	Foreign-source taxable income	Taxes deemed paid [2]
	(1)	(2)	(3)	(4)	(5)	(6)
Total	**9,821**	**1,705,182,720**	**284,574,092**	**185,256,579**	**767,587,994**	**127,911,859**
Section 965 income [3]	269	644,222,730	284,574,092	N/A	343,265,721	74,170,231
Global Intangible Low-Taxed Income (GILTI)	2,842	375,391,545	N/A	185,256,579	164,979,034	37,526,018
All other sources	9,051	685,568,445	N/A	N/A	259,343,239	16,215,610

N/A—not applicable.
[1] Total number of returns may not equal the sum of returns for specific income sources because a return could include two or more income sources.
[2] Includes section 965 taxes deemed paid before the application of a reduction generally corresponding to the section 965 deduction. Includes GILTI amounts after the application of the 80-percent limit.
[3] This income is understated as taxpayers with accounting periods ending before December 31, 2018, were not required to include section 965 amounts on Form 1118, *Foreign Tax Credit—Corporations*.
SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, December 2021.

[5] U.S. corporations are permitted an indirect foreign tax credit for certain taxes paid or accrued by the SFC.
[6] For statistics from the Statistics of Income Form 965 study, see https://www.irs.gov/statistics/soi-tax-stats-section-965-transition-tax-form-965-series.

Figure B. Foreign-Source Taxable Income from Corporations with a Foreign Tax Credit by Geographic Region or Income Source, Tax Year 2018

[Billions of dollars]



[1] Includes Canada, Latin America, Other Western hemisphere, Africa, U.S. possessions, section 863(b) income, regulated investment company (RIC) dividends, and country not stated
[2] Global intangible low-taxed income.
SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, December 2021.

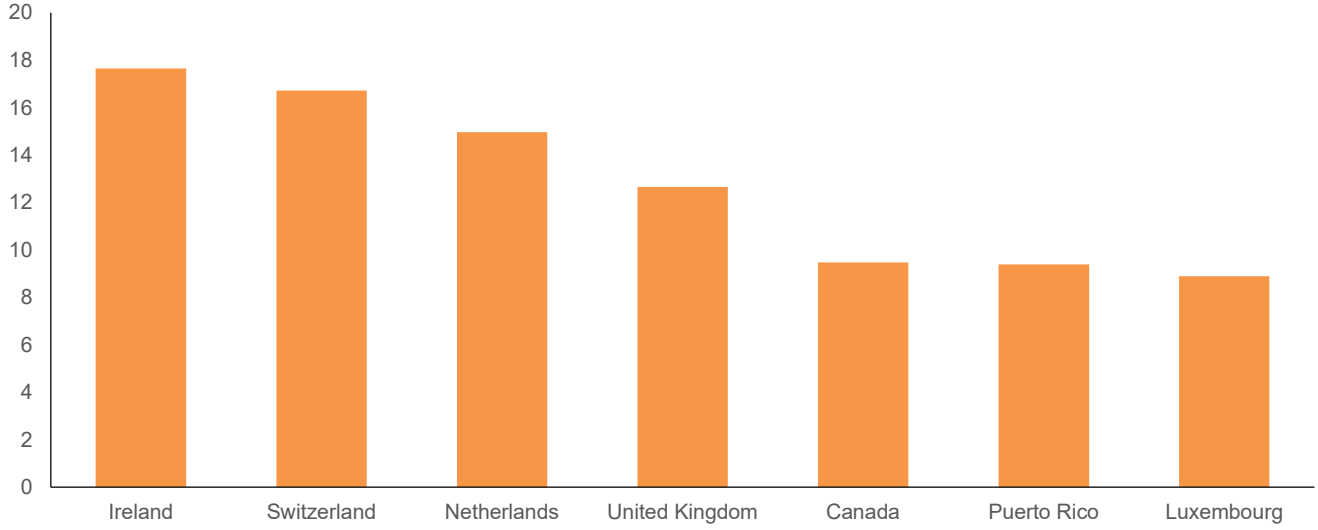
(2.2 percent, $16.7 billion), the Netherlands (2.0 percent, $15 billion), the United Kingdom (1.7 percent, $12.7 billion), and Canada (1.2 percent, $9.5 billion)—four are in Europe (Figure C). Together, these five countries were responsible for $4.2 billion of the $36 billion in total foreign taxes paid or accrued, about 12 percent of the total.[7]

Industry Data

The manufacturing industry accounted for about 58 percent ($443 billion) of the total foreign-source taxable income from corporations ($768 billion) (Figure D) and reported about 56 percent ($58 billion) of the total foreign tax credit ($103 billion). Within this industry, those corporations engaged in

Figure C. Foreign-Source Taxable Income from Corporations with a Foreign Tax Credit, by Selected Country, Tax Year 2018

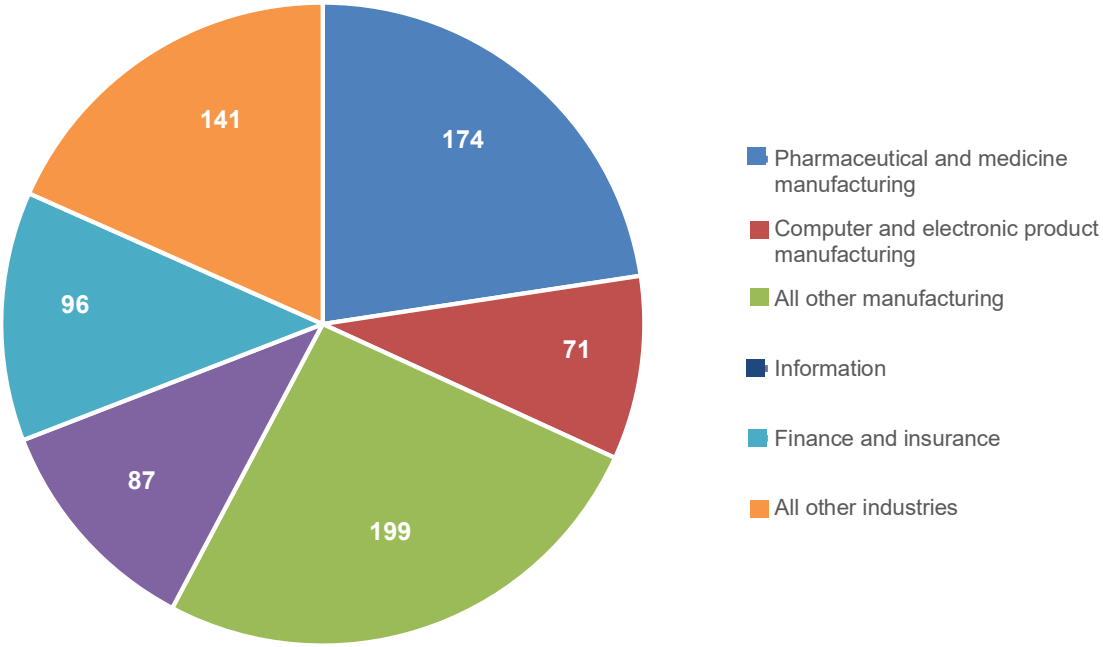
[Billions of dollars]



SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, December 2021.

[7] Data for the $128 billion of total foreign taxes deemed paid is not available by specific country.

Figure D. Foreign-Source Taxable Income from Corporations Claiming a Foreign Tax Credit, by Selected Industry, Tax Year 2018
[Billions of dollars]



SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, December 2021.

pharmaceutical and medicine manufacturing, a subsector of chemical manufacturing, were responsible for 23 percent ($174 billion) of the total foreign-source taxable income and 14 percent ($15 billion) of the total foreign tax credit, despite comprising less than 1 percent of all returns. Another prominent manufacturing sector, computer product and electronic equipment manufacturing, accounted for 9 percent ($71 billion) of the total foreign-source taxable income and 7 percent ($7 billion) of the foreign tax credit. The largest nonmanufacturing industrial sector was finance and insurance. This industry accounted for almost 13 percent ($96 billion) of the total foreign-source taxable income and nearly 14 percent ($14 billion) of the total foreign tax credit.

Summary

Corporations claiming the foreign tax credit reported nearly $768 billion in foreign-source taxable income and claimed $103.5 billion in foreign tax credit for Tax Year 2018. Although the foreign tax credit appears to have increased 71 percent over Tax Year 2017, much of the apparent jump is due to differences in the reporting requirements for section 965, a one-time provision which applied mostly to Tax Years 2017 and 2018. Data for Tax Year 2017 section 965 amounts for these statistics are not available since corporations with tax years ending before December 31, 2018, were not required to report section 965 amounts on Form 1118. Taxable income from the section 965 provisions was responsible for about 45 percent of the foreign-source taxable income for Tax Year 2018, while the new GILTI provisions were responsible for nearly 22 percent of the foreign taxable income. Corporations that produce pharmaceuticals and medicines filed less than 1 percent of the number of returns with a foreign tax credit but were responsible for 23 percent of the total foreign-source taxable income.

Data Sources and Limitations

Internal Revenue Code sections 901 through 909 specify the provisions for the foreign tax credit. Corporations report the foreign income and taxes related to the credit on Form 1118, *Foreign Tax Credit—Corporations*, and file it with their corporate tax return. The statistics in this data release are based on information reported on Forms 1118 and related corporate tax forms for those corporation income tax returns with a foreign tax credit that were included in the Tax Year 2018 Statistics of Income (SOI) stratified sample of corporate returns with accounting periods ending between July 2018 and June 2019.[8] SOI selected these returns after administrative processing, but prior to any amendments or audit examination. The Tax Year 2018 corporation income tax return sample included Forms 1120, 1120-F, 1120-L, 1120-PC, and 1120-REIT.[9]

Foreign income and taxes available for credit are understated to the extent to which they were not reported on Form 1118 filed with the associated Form 1120. As mentioned previously,

[8] See also "Description of the Sample and Limitations of the Data" at https://www.irs.gov/statistics/soi-tax-stats-corporation-income-tax-returns-complete-report-publication-16.
[9] The complete titles of these forms are Form 1120-F, *U.S. Income Tax Return of a Foreign Corporation;* Form 1120-L, *U.S. Life Insurance Company Income Tax Return*; Form 1120-PC, *U.S. Property and Casualty Insurance Company Income Tax Return*; and Form 1120-REIT, *U.S. Income Tax Return for Real Estate Investment Trusts*.

taxpayers were not required to report data related to section 965 on the Form 1118 included with their tax return if their accounting period ended before December 31, 2018. This study includes credits carried forward from prior years and used in Tax Year 2018. However, because amended returns are not included in the sample, these statistics do not contain foreign taxes carried back to Tax Year 2018 from subsequent tax years, or credits for foreign taxes from 2018 carried back to the prior year. In addition, corporations that have foreign income and taxes but could not claim a foreign tax credit because they did not have a U.S tax liability are not included. Finally, some corporations may have deducted their foreign taxes from their gross income rather than claim a foreign tax credit. These deductions are not included in the foreign tax credit study.

Because of the multi-tiered structure of firm ownership and the multi-country location of firms and their subsidiaries, foreign-source income and deductions that are reported on Form 1118 as earned in one country can include income and deductions that originate in another country. In addition, deductions that are not definitely allocable are usually not reported by country. For this study, these deductions are prorated across all countries on the basis of the gross income reported for each. Finally, because the estimates are based on a sample, they are subject to sampling error. Since large corporations, which are sampled at 100 percent, reported most of the foreign tax credit, the sampling error for the amounts is estimated to be very small.

Description of Tables 1, 2, and 3

Table 1, in columns 2 through 8, presents statistics on assets, receipts, income, and taxes reported on the basic corporation income tax returns for those corporations that claimed a foreign tax credit. Columns 9 through 35 present statistics from Form 1118, *Foreign Tax Credit—Corporations*. Foreign branch income (column 18) is contained in the gross income columns (9-17) but reported separately on either Form 1118 (Schedule F, *Gross Income and Definitely Allocable Deductions for Foreign Branches*) or on the Form 1118 filed for the new foreign branch category, depending on the ending accounting period of the corporation. Table 2 includes foreign income, deductions, and taxes paid or accrued from Form 1118, by selected geographic region and country or income source. Taxes deemed paid are not included, as corporations were not required to report them by country. Table 3 includes foreign income; deductions; and taxes paid, accrued, or deemed paid from Form 1118, by separate limitation category.

Explanation of Selected Terms

Carryover of foreign taxes—Corporations can carry taxes paid in excess of the limitation back 1 year or forward up to 10 years.

Controlled foreign corporation (CFC)—As defined in IRC section 957(a), a CFC is any foreign corporation in which U.S. shareholders own directly, indirectly, or constructively more than 50 percent of either the total combined voting power or total value of all stock on any day of the taxable year of the corporation.

Deemed dividends—Certain types of income earned by controlled foreign corporations (CFCs) are recognized under Subpart F of the IRC as current-year income of the U.S. corporation, even if no income is actually received from the CFC in the current tax year. In such cases, the U.S. corporation is deemed to have received a pro rata share of this income and is required to report it as a "deemed dividend" on Form 1118, Schedule A. See IRC section 951(a) for a more detailed description of income reported as deemed dividends.

Dividend gross-up—U.S. corporations that satisfy ownership and other requirements are permitted to take an indirect foreign tax credit for taxes paid on profits from which dividends were distributed. Under IRC section 78, these taxes are "deemed paid" by U.S. corporations under IRC sections 902 and 960(a). Consequently, the dividend income is "grossed up" by the amount of taxes deemed paid on the income from which the dividend was paid.

Foreign branch income—This separate limitation category includes income, deductions, and taxes paid or accrued by foreign branches of the U.S. parent corporation.

Foreign-source taxable income—This is gross income (less loss) less deductions from sources outside the United States, including U.S. possessions, before adjustments.

General limitation income—This separate limitation category contains all foreign income not included in any other separate limitation category.

Income re-sourced by bilateral tax treaty—This separate limitation category includes certain U.S.-source income that has been subject to tax in another country pursuant to a bilateral income tax treaty. To relieve double taxation, these items of income are reclassified by a treaty provision as arising from foreign sources. A separate foreign tax credit limitation must be computed for each amount re-sourced by a tax treaty.

Net section 965 tax liability—Taxpayers compute their net IRC section 965 tax liability by computing their total tax liability after all applicable credits with section 965 amounts included and then subtracting their total tax liability after all applicable credits without section 965 amounts.

Passive income—This separate limitation category is composed of dividends, interest, rents, royalties, annuities, and net capital gains, as well as commodity transactions not connected with the active conduct of a trade or business. Passive income subject to a foreign tax rate that exceeds the highest applicable U.S. tax rate is excluded from this separate limitation category and included in general limitation income.

Section 901(j) income—This separate limitation category includes income and taxes paid or accrued to countries sanctioned by the United States. IRC section 901(j) denies credit for taxes paid or accrued to these countries. For 2018, countries subject to these restrictions included Iran, North Korea, Sudan, and Syria. A separate limitation credit is computed for each section 901(j) country for informational purposes.

Section 951A income—This separate limitation category includes any amount includable under IRC section 951A (other than passive category income). Section 951A defines global intangible low-taxed income (GILTI). It includes the GILTI

inclusion, the associated dividend gross-up, the GILTI deduction, and the allowable portion of the total taxes deemed paid.

Section 965 deduction—IRC section 965 allows a deduction that results in a 15.5-percent tax on the portion of the section 965 inclusion related to cash assets and an 8-percent tax on the portion of the section 965 inclusion related to noncash assets. The deduction related to the 15.5-percent tax is applied to the portion of the inclusion attributable to the IRC section 958(a) U.S. shareholder's aggregate foreign cash position. The deduction related to the 8-percent tax is applied to the portion of the inclusion that exceeds the section 958(a) U.S. shareholder's aggregate foreign cash position.

Section 965 inclusion—IRC section 965 generally requires a U.S person who owns 10 percent or more of the voting power of a specified foreign corporation (SFC) to include their pro rata share of such corporation's untaxed accumulated post-1986 E&P as of November 2, 2017, or December 31, 2017, (whichever is greater) in their gross income.

Specified foreign corporation (SFC)—An SFC is either a CFC or a foreign corporation, other than a passive foreign investment company (PFIC), that has at least one domestic corporate U.S. shareholder.

Additional Tabular Data on Tax Stats

For additional Form 1118 tabular data, see the Corporate Foreign Tax Credit Statistics section of the Tax Stats webpage at https://www.irs.gov/uac/SOI-Tax-Stats-Corporate-Foreign-Tax-Credit-Statistics. Income, deduction, and tax data items for corporations claiming a foreign tax credit are available annually beginning with Tax Year 2004. Data are available by major and selected minor industry, as well as by geographic region and country.

Melissa Costa is an economist with the International Returns Analysis Section. This data release was prepared under the direction of Nuria McGrath, Chief, International Returns Analysis Section.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Net income (less deficit)	Income subject to U.S. tax	U.S. income tax before credits
	(1)	(2)	(3)	(4)	(5)	(6)
All industries	**9,821**	**50,771,742,495**	**13,177,335,048**	**2,186,209,794**	**1,566,944,863**	**319,294,935**
Agricultural, forestry, fishing and hunting	**210**	**10,069,389**	**14,387,831**	**407,953**	**295,661**	**68,170**
Mining	**60**	**158,386,082**	**98,975,790**	**9,019,594**	**5,593,645**	**1,192,329**
Oil and gas extraction	23	75,602,569	73,233,685	5,014,608	2,639,995	557,165
All other mining	37	82,783,513	25,742,104	4,004,986	2,953,650	635,165
Utilities	**14**	**323,238,264**	**111,077,482**	**4,700,229**	**3,718,290**	**780,841**
Construction	**350**	**65,630,916**	**84,572,208**	**3,622,647**	**3,332,960**	**704,962**
Construction of buildings	103	33,931,014	51,392,939	1,196,086	1,121,721	236,832
Heavy and civil engineering construction and land subdivision	137	16,114,757	20,018,481	1,201,159	1,082,979	229,610
Specialty trade contractors	110	15,585,145	13,160,788	1,225,402	1,128,260	238,520
Manufacturing	**1,476**	**10,465,576,123**	**4,789,317,419**	**1,053,787,324**	**663,202,875**	**125,664,913**
Food manufacturing	69	1,062,441,567	320,039,601	83,397,869	59,618,339	8,822,569
Beverage and tobacco products	9	*168,290,997	72,621,922	19,818,559	16,643,140	3,893,253
Paper manufacturing	30	176,862,006	84,604,467	18,402,644	13,355,415	2,801,798
Printing and related support activities	19	16,987,097	17,668,744	1,776,012	1,371,439	291,112
Petroleum and coal products manufacturing	18	1,781,407,197	1,065,859,773	55,553,840	40,629,122	8,158,565
Chemical manufacturing	212	2,804,850,679	783,961,374	436,644,661	242,251,616	38,269,009
Pharmaceutical and medicine manufacturing	52	1,607,851,402	415,867,801	364,900,808	194,110,559	27,940,801
Other chemical manufacturing	160	1,196,999,278	368,093,574	71,743,853	48,141,056	10,328,208
Plastics and rubber products manufacturing	88	71,465,331	58,800,367	7,413,810	5,877,846	1,250,821
Nonmetallic mineral product manufacturing	32	62,464,716	25,686,671	3,417,258	2,394,632	529,091
Primary metal manufacturing	50	67,389,035	81,047,188	6,576,364	6,035,111	1,279,629
Fabricated metal products	139	130,388,881	78,128,702	12,681,342	9,683,902	2,101,827
Machinery manufacturing	217	460,266,843	271,955,219	50,401,792	29,846,268	6,472,054
Computer and electronic product manufacturing	204	981,247,338	452,027,993	168,569,743	102,002,089	24,181,356
Electrical equipment, appliance and component manufacturing	116	810,237,629	210,097,268	35,234,121	28,016,891	6,339,150
Transportation equipment manufacturing	118	1,419,604,033	1,043,170,084	113,777,815	80,863,528	15,960,825
Motor vehicles and related manufacturing	82	794,285,021	649,183,137	43,306,838	34,383,775	7,266,501
Other transportation equipment manufacturing	37	625,319,011	393,986,947	70,470,978	46,479,753	8,694,323
Furniture and related product manufacturing	17	20,842,272	22,539,835	1,717,345	1,409,900	297,543
Miscellaneous manufacturing and manufacturing not allocable	137	430,830,501	201,108,210	38,404,150	23,203,635	5,016,314
Wholesale and retail trade	**1,165**	**3,394,224,125**	**3,089,023,091**	**200,583,099**	**163,289,317**	**36,997,170**
Wholesale trade	947	2,597,448,421	1,799,255,693	129,186,733	102,262,285	23,357,134
Durable goods	533	480,482,928	566,552,174	32,933,268	26,258,309	6,584,614
Motor vehicles, parts, supplies	32	36,321,190	58,588,377	3,294,079	2,590,221	509,525
Electrical goods	139	154,143,278	219,269,923	11,973,977	8,459,255	1,777,378
Machinery, equipment, and supplies	145	75,714,437	78,451,090	4,161,516	3,599,528	775,719
Furniture, sports, toys, recycle, jewelry	88	29,668,306	54,532,974	1,547,536	1,272,231	275,985
Other miscellaneous durable goods	129	184,635,717	155,709,810	11,956,160	10,337,074	3,246,007
Nondurable goods	415	2,116,965,492	1,232,703,519	96,253,466	76,003,976	16,772,520
Drugs and druggists' sundries	71	476,260,468	430,161,922	37,511,305	28,047,608	6,590,070
Apparel, piece goods, and notions	46	344,689,016	61,932,237	10,154,624	6,557,155	1,493,889
Groceries and related products	142	1,065,496,958	295,105,273	35,457,567	31,383,094	6,451,527
Chemicals and allied products	43	18,412,771	24,948,585	3,393,364	2,878,033	628,123
Other miscellaneous nondurable goods	112	212,106,279	420,555,502	9,736,604	7,138,086	1,608,911
Retail trade	218	796,775,706	1,289,767,398	71,396,365	61,027,033	13,640,036
Motor vehicle and parts dealers	71	37,882,310	43,166,839	3,026,372	2,620,232	610,949
Miscellaneous retail trade	147	758,893,397	1,246,600,558	68,369,994	58,406,801	13,029,087
Transportation and warehousing	**223**	**303,820,200**	**270,026,860**	**21,625,361**	**19,090,523**	**4,018,144**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Number of returns	Total assets	Total receipts	Net income (less deficit)	Income subject to U.S. tax	U.S. income tax before credits
	(1)	(2)	(3)	(4)	(5)	(6)
Information	**321**	**2,918,607,901**	**881,357,998**	**274,232,186**	**202,160,122**	**46,658,026**
Publishing (except internet)	105	610,247,471	197,764,888	109,325,499	64,758,397	15,598,582
Motion picture and sound recording	28	46,569,916	70,262,355	28,858,124	28,458,160	6,065,304
Broadcasting, internet publishing	19	251,921,366	106,167,026	17,379,269	16,460,806	3,899,437
Telecommunications	50	1,589,924,616	303,411,719	28,437,284	25,456,797	5,351,568
Other information services	119	419,944,533	203,752,011	90,232,010	67,025,962	15,743,135
Finance and insurance	**2,193**	**16,563,658,241**	**2,495,019,712**	**316,154,300**	**265,127,875**	**53,327,659**
Depository credit intermediation	43	673,604,449	62,274,214	11,975,958	10,506,148	2,235,813
Securities, commodity contracts, and other financial investments	567	3,215,107,811	227,090,106	104,263,603	86,150,074	16,501,018
Insurance and related activities	1,505	8,732,777,947	2,061,649,908	147,612,085	121,955,603	25,719,209
Life insurance	81	5,886,018,343	868,179,550	55,259,391	39,416,221	8,289,213
Property and casualty insurance	1,346	2,707,434,917	1,159,495,794	86,202,257	77,850,376	16,452,416
All other insurance related activities	77	139,324,687	33,974,565	6,150,438	4,689,006	977,580
All other finance industries	78	3,942,168,034	144,005,484	52,302,654	46,516,049	8,871,618
Real estate and rental and leasing	**696**	**114,586,023**	**55,987,150**	**10,790,275**	**7,887,741**	**1,553,575**
Professional, scientific, and technical services	**1,449**	**475,263,108**	**270,096,052**	**40,779,421**	**28,067,177**	**6,237,171**
Bank holding companies	**52**	**15,213,523,703**	**725,047,360**	**146,436,648**	**132,849,073**	**27,721,178**
Other holding companies	**1,127**	**264,767,075**	**20,886,102**	**32,541,696**	**20,019,827**	**4,316,102**
Administrative and support and waste management and remediation	**206**	**146,303,720**	**97,018,863**	**33,118,852**	**24,140,946**	**4,170,754**
Education services, health care, and social assistance	**75**	**29,204,894**	**18,673,155**	**1,915,646**	**1,686,969**	**355,417**
Arts, entertainment, and recreation	**69**	**14,709,977**	**7,204,228**	**1,066,130**	**878,267**	**194,583**
Accommodation and food services	**72**	**279,532,144**	**131,763,662**	**33,735,064**	**24,046,148**	**5,006,836**
Other services	**63**	**30,640,609**	**16,900,085**	**1,693,369**	**1,557,447**	**327,105**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign tax credit	U.S. income tax after credits [1]	Foreign income, deductions, and taxes reported on Form 1118			
			Gross income (less loss)			
			Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest
	(7)	(8)	(9)	(10)	(11)	(12)
All industries	**103,455,876**	**169,215,242**	**1,705,182,720**	**1,024,456,314**	**102,009,684**	**86,403,012**
Agricultural, forestry, fishing and hunting	**17,088**	**45,692**	**319,140**	**190,502**	*** 55,602**	*** 26,228**
Mining	**550,850**	**226,654**	**5,233,787**	**1,478,993**	**595,155**	**149,024**
Oil and gas extraction	211,549	12,507	1,053,436	* 175,994	d	* 14,703
All other mining	339,302	214,147	4,180,351	1,302,999	d	134,320
Utilities	**23,333**	*** 126,767**	**312,564**	*** 216,015**	*** 19,590**	**d**
Construction	**67,057**	**549,013**	**935,797**	**303,999**	**57,854**	**61,147**
Construction of buildings	13,644	210,620	194,880	47,195	13,370	d
Heavy and civil engineering construction and land subdivision	23,215	134,824	376,679	53,883	* 6,761	* -1,781
Specialty trade contractors	30,198	203,569	364,238	202,922	37,723	d
Manufacturing	**57,743,078**	**54,332,811**	**956,027,355**	**662,890,641**	**51,588,202**	**19,797,043**
Food manufacturing	4,454,331	4,159,330	71,633,687	58,339,065	6,807,500	2,727,173
Beverage and tobacco products	1,060,572	2,805,400	11,038,251	5,204,128	1,065,287	81,100
Paper manufacturing	986,088	1,308,222	12,099,747	7,691,107	1,455,455	* 124,679
Printing and related support activities	46,531	227,403	887,042	497,804	114,810	* 57,660
Petroleum and coal products manufacturing	6,409,837	1,597,149	76,159,989	18,065,896	883,586	7,819,684
Chemical manufacturing	20,093,289	15,179,264	426,338,087	350,233,776	18,646,711	4,384,274
Pharmaceutical and medicine manufacturing	14,935,197	10,576,557	367,209,255	309,493,183	12,210,369	3,625,593
Other chemical manufacturing	5,158,093	4,602,707	59,128,832	40,740,593	6,436,342	758,681
Plastics and rubber products manufacturing	286,696	879,707	3,458,942	2,078,480	417,892	77,346
Nonmetallic mineral product manufacturing	198,852	289,907	2,876,033	1,236,129	154,815	* 11,973
Primary metal manufacturing	57,015	1,163,580	916,830	202,854	35,484	35,729
Fabricated metal products	707,039	1,319,658	7,464,234	4,834,425	1,007,700	239,046
Machinery manufacturing	3,695,959	2,205,053	42,839,903	29,181,598	3,763,010	790,884
Computer and electronic product manufacturing	6,965,674	13,070,864	164,647,743	110,064,537	6,942,000	830,046
Electrical equipment, appliance and component manufacturing	3,437,929	1,416,526	22,529,959	10,139,988	2,584,512	372,992
Transportation equipment manufacturing	7,012,405	6,096,421	74,166,361	40,206,904	5,057,819	1,264,005
Motor vehicles and related manufacturing	4,908,580	1,301,815	32,781,148	9,727,237	2,502,877	904,872
Other transportation equipment manufacturing	2,103,826	4,794,606	41,385,213	30,479,668	2,554,941	359,133
Furniture and related product manufacturing	53,708	226,146	859,982	353,451	82,816	* 31,306
Miscellaneous manufacturing and manufacturing not allocable	2,277,152	2,388,181	38,110,564	24,560,498	2,568,806	949,146
Wholesale and retail trade	**6,504,751**	**27,203,409**	**108,754,895**	**53,564,176**	**7,197,802**	**1,602,007**
Wholesale trade	4,476,956	16,644,358	81,076,015	37,807,938	5,211,729	1,240,527
Durable goods	1,652,301	4,335,981	26,239,718	9,500,972	1,587,987	229,592
Motor vehicles, parts, supplies	97,433	399,651	1,395,785	1,090,492	157,064	* 31,477
Electrical goods	726,048	901,194	13,676,971	5,045,771	695,182	102,628
Machinery, equipment, and supplies	170,021	525,775	1,716,566	599,468	185,292	18,326
Furniture, sports, toys, recycle, jewelry	48,823	219,006	951,458	300,762	68,539	18,334
Other miscellaneous durable goods	609,977	2,290,355	8,498,939	2,464,479	481,909	58,827
Nondurable goods	2,824,655	12,308,377	54,836,296	28,306,965	3,623,742	1,010,935
Drugs and druggists' sundries	747,486	5,336,578	25,778,382	10,752,900	965,304	572,588
Apparel, piece goods, and notions	769,211	658,391	9,726,928	6,531,252	1,037,420	55,287
Groceries and related products	797,259	4,639,429	10,721,437	4,765,122	888,207	* 97,066
Chemicals and allied products	49,694	575,396	2,913,677	2,479,672	77,202	* 10,524
Other miscellaneous nondurable goods	461,004	1,098,583	5,695,874	3,778,020	655,608	275,470
Retail trade	2,027,794	10,559,052	27,678,882	15,756,239	1,986,071	361,482
Motor vehicle and parts dealers	93,472	499,580	1,078,016	594,285	81,537	d
Miscellaneous retail trade	1,934,322	10,059,473	26,600,866	15,161,954	1,904,534	d
Transportation and warehousing	**514,154**	**3,375,359**	**15,362,928**	**3,245,844**	**670,731**	**113,800**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign tax credit	U.S. income tax after credits [1]	Foreign income, deductions, and taxes reported on Form 1118			
			Gross income (less loss)			
			Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest
	(7)	(8)	(9)	(10)	(11)	(12)
Information	**9,428,687**	**33,581,975**	**197,985,518**	**115,494,050**	**8,342,484**	**851,750**
Publishing (except internet)	5,102,712	9,294,976	108,494,866	68,141,041	4,012,618	200,324
Motion picture and sound recording	283,875	5,749,697	4,481,673	* 233,689	* 23,033	d
Broadcasting, internet publishing	499,225	3,290,781	11,160,808	615,796	* 72,759	d
Telecommunications	369,082	4,491,157	15,958,073	2,239,454	445,908	* 299,657
Other information services	3,173,793	10,755,365	57,890,097	44,264,070	3,788,166	119,753
Finance and insurance	**14,295,322**	**28,553,778**	**194,246,528**	**93,426,422**	**15,559,739**	**26,444,791**
Depository credit intermediation	307,274	1,461,497	1,303,621	17,395	d	1,104,406
Securities, commodity contracts, and other financial investments	6,743,870	7,383,582	70,018,710	48,619,420	8,543,588	8,957,502
Insurance and related activities	5,704,916	14,875,094	90,157,826	25,478,404	5,146,608	15,872,014
Life insurance	3,513,298	3,192,069	63,773,937	15,438,218	3,303,327	12,275,807
Property and casualty insurance	1,831,074	11,116,118	20,314,654	7,490,149	1,335,854	3,551,864
All other insurance related activities	360,544	566,907	6,069,235	2,550,037	507,427	44,344
All other finance industries	1,539,262	4,833,605	32,766,371	19,311,204	d	510,869
Real estate and rental and leasing	**503,732**	**987,200**	**9,505,723**	**4,920,255**	**562,077**	**88,012**
Professional, scientific, and technical services	**2,018,173**	**3,636,614**	**49,397,492**	**16,770,256**	**2,096,782**	**224,583**
Bank holding companies	**5,089,285**	**9,681,088**	**87,338,338**	**19,287,442**	**3,795,601**	**35,283,088**
Other holding companies	**2,133,799**	**2,140,570**	**25,552,104**	**17,504,799**	**3,579,638**	**576,906**
Administrative and support and waste management and remediation	**2,313,292**	**1,532,484**	**27,591,857**	**20,467,130**	**3,705,507**	**695,283**
Education services, health care, and social assistance	**19,247**	**325,475**	**481,536**	**171,598**	**19,831**	*** 809**
Arts, entertainment, and recreation	**47,359**	**145,275**	**726,782**	**26,014**	*** 8,106**	**d**
Accommodation and food services	**2,151,475**	**2,487,762**	**24,796,160**	**14,371,324**	**4,117,666**	**482,172**
Other services	**35,194**	**283,316**	**614,215**	**126,854**	**37,317**	**d**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued					
	Rents, royalties, and license fees	Sales income	Service income	Section 986c, 987 and 988 gain or loss	Other income	Foreign branch income [2]
	(13)	(14)	(15)	(16)	(17)	(18)
All industries	**155,460,701**	**141,974,060**	**64,032,512**	**-3,492,003**	**134,338,440**	**206,468,071**
Agricultural, forestry, fishing and hunting	**d**	**d**	**d**	**0**	**d**	**0**
Mining	*** 82,043**	**2,262,362**	*** 445,378**	**-11,105**	**231,937**	**1,870,895**
Oil and gas extraction	d	* 717,714	0	d	* 91,411	* 316,925
All other mining	d	* 1,544,647	* 445,378	d	140,526	* 1,553,970
Utilities	**0**	**0**	**d**	**0**	**d**	**d**
Construction	*** 43,164**	*** 260,405**	**183,953**	**-6,700**	**31,974**	**299,871**
Construction of buildings	0	d	* 80,741	d	* 11,887	* 132,139
Heavy and civil engineering construction and land subdivision	d	d	d	d	d	d
Specialty trade contractors	d	d	d	d	d	d
Manufacturing	**72,190,428**	**96,680,054**	**5,137,421**	**-2,397,937**	**50,141,502**	**85,536,069**
Food manufacturing	1,345,626	1,504,391	34,467	-247,471	1,122,935	1,968,458
Beverage and tobacco products	d	d	d	d	881,167	d
Paper manufacturing	1,336,838	906,656	d	d	554,311	922,890
Printing and related support activities	* 135,881	* 62,421	d	d	* 7,294	d
Petroleum and coal products manufacturing	* 987,239	30,562,478	d	d	18,867,615	51,419,214
Chemical manufacturing	35,989,960	9,644,313	1,015,311	-439,013	6,862,754	9,805,064
Pharmaceutical and medicine manufacturing	30,094,038	6,634,383	165,920	10,696	4,975,074	5,853,535
Other chemical manufacturing	5,895,921	3,009,931	849,391	-449,708	1,887,680	3,951,529
Plastics and rubber products manufacturing	265,512	412,715	* 14,007	-8,418	201,407	310,137
Nonmetallic mineral product manufacturing	598,150	d	d	2,118	* 109,495	d
Primary metal manufacturing	40,954	337,581	* 16,630	3,728	243,872	* 283,280
Fabricated metal products	388,999	735,323	* 28,173	-31,719	262,285	445,915
Machinery manufacturing	3,248,955	2,060,939	711,109	-33,736	3,117,143	1,681,657
Computer and electronic product manufacturing	14,253,185	22,478,662	1,256,098	-24,102	8,847,317	7,019,209
Electrical equipment, appliance and component manufacturing	1,139,789	3,335,875	450,595	-472,781	4,978,991	4,035,193
Transportation equipment manufacturing	5,854,249	18,426,666	1,045,671	71,812	2,239,234	4,155,842
Motor vehicles and related manufacturing	4,215,763	15,317,147	* 162,423	130,098	-179,269	2,345,986
Other transportation equipment manufacturing	1,638,486	3,109,519	883,248	-58,286	2,418,503	1,809,856
Furniture and related product manufacturing	d	* 344,659	d	d	27,269	* 157,865
Miscellaneous manufacturing and manufacturing not allocable	4,749,140	3,395,129	126,821	-57,385	1,818,411	1,274,272
Wholesale and retail trade	**18,526,046**	**14,180,641**	**2,296,687**	**-73,610**	**11,461,149**	**d**
Wholesale trade	14,607,044	11,393,547	1,710,808	-118,664	9,223,086	9,092,041
Durable goods	7,993,108	4,447,123	1,407,251	-52,717	1,126,400	2,729,345
Motor vehicles, parts, supplies	d	* 100,274	d	d	d	* 22,306
Electrical goods	4,627,825	2,314,642	575,540	* -9,439	324,822	1,818,467
Machinery, equipment, and supplies	* 65,613	638,637	114,869	-9,066	103,426	229,417
Furniture, sports, toys, recycle, jewelry	d	291,082	d	d	d	101,587
Other miscellaneous durable goods	3,134,247	1,102,489	696,714	-18,764	579,038	557,568
Nondurable goods	6,613,936	6,946,423	303,557	-65,947	8,096,686	6,362,696
Drugs and druggists' sundries	4,744,931	4,106,027	d	d	4,535,133	3,501,061
Apparel, piece goods, and notions	966,781	751,330	d	d	352,118	894,684
Groceries and related products	d	* 1,371,412	0	d	* 3,014,571	* 1,569,381
Chemicals and allied products	d	* 219,803	d	d	* 36,561	* 164,485
Other miscellaneous nondurable goods	278,895	497,851	* 56,482	* -4,756	158,303	233,086
Retail trade	3,919,001	2,787,096	585,879	45,053	2,238,062	d
Motor vehicle and parts dealers	d	d	d	d	d	d
Miscellaneous retail trade	d	d	d	d	d	d
Transportation and warehousing	**228,155**	*** 1,888,153**	**6,932,354**	*** 5,422**	**2,278,469**	**1,731,623**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Gross income (less loss)—continued					
	Rents, royalties, and license fees	Sales income	Service income	Section 986c, 987 and 988 gain or loss	Other income	Foreign branch income [2]
	(13)	(14)	(15)	(16)	(17)	(18)
Information	**45,986,291**	**10,157,428**	**10,924,709**	**-32,753**	**6,261,560**	**9,792,563**
Publishing (except internet)	23,860,054	4,974,548	5,143,081	-13,406	2,176,607	3,357,643
Motion picture and sound recording	2,115,705	d	d	d	* 485,087	d
Broadcasting, internet publishing	9,526,334	d	d	d	741,522	d
Telecommunications	6,841,122	d	* 1,394,504	d	1,896,013	* 2,303,394
Other information services	3,643,075	* 753,457	d	d	962,331	2,245,765
Finance and insurance	**2,842,157**	**11,079,890**	**12,742,996**	**-284,561**	**32,435,094**	**28,722,331**
Depository credit intermediation	d	0	d	0	115,675	101,071
Securities, commodity contracts, and other financial investments	576,980	d	1,129,688	d	1,062,502	2,383,340
Insurance and related activities	596,292	1,218,226	11,022,363	-247,560	31,071,478	20,422,880
Life insurance	d	d	6,353,333	-163,925	25,951,460	16,464,791
Property and casualty insurance	d	d	2,302,942	-11,362	4,984,792	3,407,596
All other insurance related activities	d	d	* 2,366,088	-72,273	135,226	* 550,493
All other finance industries	d	d	d	d	185,440	5,815,039
Real estate and rental and leasing	**3,186,430**	**d**	**161,918**	**d**	**481,718**	**532,815**
Professional, scientific, and technical services	**5,422,586**	**1,559,784**	**22,063,792**	**-219,327**	**1,479,035**	**16,409,082**
Bank holding companies	**1,111,283**	**d**	**d**	**d**	**26,583,214**	**45,892,372**
Other holding companies	**2,014,531**	**d**	**d**	**d**	**1,120,734**	**974,330**
Administrative and support and waste management and remediation	**1,107,268**	*** 839,552**	**663,151**	**-84,499**	**198,465**	**1,463,533**
Education services, health care, and social assistance	*** 59,651**	**d**	*** 104,138**	**d**	*** 97,753**	**d**
Arts, entertainment, and recreation	**d**	**0**	*** 24,107**	**0**	**341,497**	*** 124,039**
Accommodation and food services	**2,213,195**	**2,509,087**	**300,698**	**-45,026**	**847,044**	**1,853,814**
Other services	*** 112,553**	**d**	**d**	**d**	*** 258,246**	*** 325,739**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Deductions			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments
	Total	Deductions allocable to specific types of income	Deductions not allocable and net operating loss deduction			
	(19)	(20)	(21)	(22)	(23)	(24)
All industries	**937,594,727**	**731,619,033**	**205,975,694**	**767,587,994**	**-29,342,584**	**796,930,577**
Agricultural, forestry, fishing and hunting	*** 167,540**	*** 125,088**	*** 42,452**	**151,600**	*** 37,420**	**114,179**
Mining	**2,909,704**	**2,497,643**	**412,061**	**2,324,083**	**-855,861**	**3,179,944**
Oil and gas extraction	546,080	d	d	507,356	* -844,736	1,352,091
All other mining	2,363,624	d	d	1,816,727	* -11,125	1,827,852
Utilities	*** 185,013**	*** 119,067**	*** 65,947**	**127,550**	**d**	**d**
Construction	**511,344**	**330,758**	**180,585**	**424,454**	**47,100**	**377,354**
Construction of buildings	91,290	d	d	103,591	d	d
Heavy and civil engineering construction and land subdivision	227,978	* 64,812	* 163,166	148,701	* 21,692	127,009
Specialty trade contractors	192,076	d	d	172,162	d	d
Manufacturing	**513,014,851**	**413,753,264**	**99,261,586**	**443,012,504**	**-7,331,036**	**450,343,540**
Food manufacturing	29,647,855	24,693,865	4,953,991	41,985,832	14,537,941	27,447,891
Beverage and tobacco products	5,953,484	4,284,029	1,669,455	5,084,767	d	d
Paper manufacturing	6,211,602	4,876,847	1,334,756	5,888,145	-55,913	5,944,058
Printing and related support activities	514,147	430,551	83,596	372,895	* 35,986	336,910
Petroleum and coal products manufacturing	41,775,518	31,519,293	10,256,225	34,384,471	-3,493,115	37,877,586
Chemical manufacturing	225,558,478	193,546,977	32,011,501	200,779,609	4,223,042	196,556,567
Pharmaceutical and medicine manufacturing	193,620,376	168,710,720	24,909,656	173,588,879	5,136,037	168,452,842
Other chemical manufacturing	31,938,102	24,836,257	7,101,845	27,190,730	-912,996	28,103,725
Plastics and rubber products manufacturing	2,068,831	1,667,288	401,543	1,390,110	-323,871	1,713,982
Nonmetallic mineral product manufacturing	1,533,514	851,780	681,734	1,342,518	d	d
Primary metal manufacturing	549,007	447,924	101,084	367,823	-8,252	376,075
Fabricated metal products	3,931,955	3,156,430	775,525	3,532,279	-297,896	3,830,175
Machinery manufacturing	24,367,090	18,821,185	5,545,905	18,472,813	-423,516	18,896,329
Computer and electronic product manufacturing	93,923,670	69,824,428	24,099,242	70,724,073	375,335	70,348,738
Electrical equipment, appliance and component manufacturing	12,539,334	10,612,146	1,927,187	9,990,625	-8,820,433	18,811,058
Transportation equipment manufacturing	42,297,251	32,221,618	10,075,632	31,869,111	-13,594,669	45,463,780
Motor vehicles and related manufacturing	19,582,612	11,860,473	7,722,139	13,198,536	-13,096,110	26,294,646
Other transportation equipment manufacturing	22,714,638	20,361,145	2,353,493	18,670,575	-498,559	19,169,134
Furniture and related product manufacturing	551,255	409,918	* 141,337	308,727	* 35,662	273,065
Miscellaneous manufacturing and manufacturing not allocable	21,591,858	16,388,985	5,202,873	16,518,706	828,108	15,690,598
Wholesale and retail trade	**60,566,051**	**46,310,749**	**14,255,303**	**48,188,845**	**d**	**d**
Wholesale trade	44,050,310	33,707,754	10,342,557	37,025,704	d	d
Durable goods	14,448,177	11,475,627	2,972,549	11,791,542	d	d
Motor vehicles, parts, supplies	736,041	658,626	77,414	659,744	d	d
Electrical goods	9,616,127	7,779,648	1,836,478	4,060,844	-815,492	4,876,337
Machinery, equipment, and supplies	782,418	632,607	149,811	934,147	46,064	888,083
Furniture, sports, toys, recycle, jewelry	553,481	419,285	134,196	397,977	97,188	300,789
Other miscellaneous durable goods	2,760,110	1,985,461	774,649	5,738,829	154,193	5,584,636
Nondurable goods	29,602,134	22,232,126	7,370,008	25,234,163	-77,662	25,311,824
Drugs and druggists' sundries	14,646,289	8,970,640	5,675,649	11,132,093	331,520	10,800,573
Apparel, piece goods, and notions	5,232,975	4,439,590	793,384	4,493,953	78,675	4,415,278
Groceries and related products	5,986,970	5,768,965	218,005	4,734,467	* 108,536	4,625,931
Chemicals and allied products	576,098	456,085	* 120,013	2,337,579	* -11,504	2,349,084
Other miscellaneous nondurable goods	3,159,803	2,596,846	562,956	2,536,071	-584,888	3,120,959
Retail trade	16,515,740	12,602,993	3,912,747	11,163,142	-349,755	11,512,897
Motor vehicle and parts dealers	724,741	523,333	201,408	353,275	d	d
Miscellaneous retail trade	15,790,999	12,079,660	3,711,338	10,809,867	d	d
Transportation and warehousing	**11,179,625**	**10,365,470**	**814,155**	**4,183,303**	**-687,253**	**4,870,557**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Deductions			Taxable income (less loss) before adjustments	Adjustments to taxable income	Taxable income (less loss) after adjustments
	Total	Deductions allocable to specific types of income	Deductions not allocable and net operating loss deduction			
	(19)	(20)	(21)	(22)	(23)	(24)
Information	**110,643,405**	**91,145,370**	**19,498,035**	**87,342,113**	**-5,484,164**	**92,826,277**
Publishing (except internet)	59,708,529	45,424,673	14,283,856	48,786,338	-3,183,507	51,969,844
Motion picture and sound recording	3,256,125	2,489,248	* 766,876	1,225,548	* -138,485	1,364,034
Broadcasting, internet publishing	6,160,130	5,147,923	1,012,206	5,000,678	* -116,976	5,117,654
Telecommunications	13,666,851	12,236,363	1,430,488	2,291,223	* 45,802	2,245,420
Other information services	27,851,770	25,847,162	2,004,608	30,038,327	-2,090,997	32,129,324
Finance and insurance	**97,896,507**	**68,697,752**	**29,198,755**	**96,350,021**	**-7,680,357**	**104,030,379**
Depository credit intermediation	1,006,467	310,690	695,776	297,154	d	d
Securities, commodity contracts, and other financial investments	24,076,809	17,927,825	6,148,984	45,941,901	d	d
Insurance and related activities	51,775,508	31,673,943	20,101,566	38,382,318	-1,974,960	40,357,278
Life insurance	38,542,045	20,127,357	18,414,688	25,231,892	-1,110,123	26,342,016
Property and casualty insurance	9,287,401	8,144,642	1,142,759	11,027,253	-759,680	11,786,933
All other insurance related activities	3,946,063	3,401,944	544,118	2,123,172	-105,157	2,228,329
All other finance industries	21,037,723	18,785,294	2,252,429	11,728,648	470,752	11,257,896
Real estate and rental and leasing	**5,821,351**	**4,817,104**	**1,004,247**	**3,684,372**	**650,476**	**3,033,896**
Professional, scientific, and technical services	**34,108,696**	**30,584,563**	**3,524,133**	**15,288,796**	**211,103**	**15,077,692**
Bank holding companies	**60,371,215**	**27,458,655**	**32,912,560**	**26,967,124**	**-5,841,178**	**32,808,301**
Other holding companies	**13,180,381**	**11,345,728**	**1,834,653**	**12,371,723**	**-45,198**	**12,416,921**
Administrative and support and waste management and remediation	**11,417,447**	**10,410,422**	**1,007,025**	**16,174,410**	**-621,776**	**16,796,186**
Education services, health care, and social assistance	**317,580**	**253,002**	**64,578**	**163,956**	*** 38,467**	**125,487**
Arts, entertainment, and recreation	**443,460**	**381,893**	*** 61,567**	**283,322**	*** -49,161**	**332,482**
Accommodation and food services	**14,419,743**	**12,646,420**	**1,773,323**	**10,376,417**	**-706,452**	**11,082,869**
Other services	**440,814**	**376,085**	**64,729**	**173,401**	*** -6,950**	**180,351**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Foreign taxes available for credit					
				Foreign taxes paid or accrued		
	Total [3]	Limitation	Difference between limitation and foreign tax credit [4]	Total	Dividends	Interest
	(25)	(26)	(27)	(28)	(29)	(30)
All industries	**218,453,190**	**164,352,500**	**60,905,422**	**36,185,068**	**1,370,514**	**904,752**
Agricultural, forestry, fishing and hunting	**48,348**	**22,628**	**5,539**	**3,374**	**115**	**d**
Mining	**2,527,915**	**638,246**	**87,396**	**487,025**	*** 48**	**d**
Oil and gas extraction	803,477	264,312	* 52,764	55,193	* 48	d
All other mining	1,724,438	373,933	34,632	431,832	0	d
Utilities	**39,893**	**34,780**	*** 11,447**	*** 2,806**	**d**	**d**
Construction	**577,963**	**75,987**	**8,931**	**57,165**	**588**	*** 639**
Construction of buildings	48,776	16,435	2,791	24,586	234	d
Heavy and civil engineering construction and land subdivision	443,205	24,552	1,337	22,919	* 294	d
Specialty trade contractors	85,981	35,000	4,803	9,661	* 60	d
Manufacturing	**112,717,836**	**92,073,254**	**34,338,655**	**20,161,403**	**673,872**	**349,607**
Food manufacturing	6,293,207	5,619,675	1,165,344	450,278	19,872	7,727
Beverage and tobacco products	1,549,237	1,055,895	-4,677	490,695	d	d
Paper manufacturing	1,774,753	1,219,138	233,049	279,025	23,045	* 742
Printing and related support activities	106,158	67,086	20,555	* 2,916	0	d
Petroleum and coal products manufacturing	28,940,633	6,968,783	* 558,946	10,247,417	* 113,486	d
Chemical manufacturing	27,498,847	40,741,532	20,648,243	4,229,712	389,618	49,167
Pharmaceutical and medicine manufacturing	16,444,439	34,886,420	19,951,224	2,769,473	* 246,205	10,396
Other chemical manufacturing	11,054,408	5,855,112	697,019	1,460,239	143,413	38,771
Plastics and rubber products manufacturing	626,684	352,539	65,843	70,592	d	629
Nonmetallic mineral product manufacturing	256,255	288,894	89,838	108,395	* 378	* 1,053
Primary metal manufacturing	268,142	80,470	23,454	17,496	* 2,343	* 2,229
Fabricated metal products	1,305,739	779,409	72,369	114,085	3,556	5,950
Machinery manufacturing	6,277,806	3,911,368	215,398	515,254	13,518	23,773
Computer and electronic product manufacturing	11,472,285	14,668,147	7,702,474	1,108,395	41,409	11,752
Electrical equipment, appliance and component manufacturing	4,495,445	3,767,643	338,408	528,632	* 29,307	3,692
Transportation equipment manufacturing	17,506,266	9,265,558	2,253,152	1,424,545	4,319	45,474
Motor vehicles and related manufacturing	14,361,136	5,400,137	491,557	695,273	1,459	44,559
Other transportation equipment manufacturing	3,145,130	3,865,421	1,761,595	729,272	* 2,860	914
Furniture and related product manufacturing	125,062	54,518	810	9,340	* 569	d
Miscellaneous manufacturing and manufacturing not allocable	4,221,317	3,232,601	955,449	564,626	12,967	52,267
Wholesale and retail trade	**14,378,776**	**10,493,383**	**3,988,973**	**1,963,394**	**71,518**	**41,619**
Wholesale trade	8,526,307	8,075,967	3,599,351	1,117,588	47,407	33,160
Durable goods	3,177,717	2,851,272	1,199,311	501,552	25,830	14,762
Motor vehicles, parts, supplies	140,362	141,717	44,284	8,405	* 1	d
Electrical goods	1,698,674	1,018,369	292,321	158,442	* 47	4,791
Machinery, equipment, and supplies	261,209	184,677	14,996	40,189	* 543	1,138
Furniture, sports, toys, recycle, jewelry	84,237	63,132	14,309	15,835	* 1,640	d
Other miscellaneous durable goods	993,235	1,443,378	833,401	278,681	23,600	4,836
Nondurable goods	5,348,590	5,224,695	2,400,040	616,036	21,577	18,398
Drugs and druggists' sundries	1,309,754	2,246,720	1,499,234	190,433	d	* 4,130
Apparel, piece goods, and notions	1,301,811	924,621	155,410	61,655	d	d
Groceries and related products	880,666	963,414	166,155	210,713	d	* 1,614
Chemicals and allied products	156,141	489,067	439,374	21,681	d	d
Other miscellaneous nondurable goods	1,700,218	600,872	139,867	131,553	709	11,753
Retail trade	5,852,469	2,417,417	389,622	845,807	24,112	8,460
Motor vehicle and parts dealers	139,643	125,058	31,585	12,988	296	d
Miscellaneous retail trade	5,712,826	2,292,359	358,037	832,819	23,816	d
Transportation and warehousing	**746,308**	**1,010,762**	**496,608**	**150,670**	**d**	**3,627**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Foreign taxes available for credit					
				Foreign taxes paid or accrued		
	Total [3]	Limitation	Difference between limitation and foreign tax credit [4]	Total	Dividends	Interest
	(25)	(26)	(27)	(28)	(29)	(30)
Information	**13,204,894**	**19,567,306**	**10,138,620**	**4,192,467**	**47,267**	**11,703**
Publishing (except internet)	5,825,208	10,850,431	5,747,719	2,100,063	35,365	3,958
Motion picture and sound recording	862,192	300,888	17,013	297,118	d	d
Broadcasting, internet publishing	592,358	1,200,905	701,680	456,958	d	d
Telecommunications	1,759,858	462,076	92,994	463,088	1,744	0
Other information services	4,165,278	6,753,006	3,579,213	875,241	* 3,932	d
Finance and insurance	**23,503,962**	**21,335,727**	**7,040,405**	**2,228,845**	**250,135**	**204,029**
Depository credit intermediation	1,845,729	707,055	399,781	62,933	d	43,668
Securities, commodity contracts, and other financial investments	7,219,406	10,165,132	3,421,262	389,446	7,141	33,749
Insurance and related activities	12,393,332	8,105,867	2,400,951	1,195,320	202,844	100,353
Life insurance	8,950,969	5,197,018	1,683,720	768,056	137,712	d
Property and casualty insurance	2,917,802	2,446,080	615,006	351,350	64,888	24,724
All other insurance related activities	524,561	462,769	102,225	75,914	* 245	d
All other finance industries	2,045,495	2,357,673	818,411	581,146	d	* 26,259
Real estate and rental and leasing	**831,397**	**633,937**	**130,183**	**173,935**	**4,815**	**d**
Professional, scientific, and technical services	**4,521,843**	**3,129,694**	**1,111,520**	**971,448**	**18,769**	**19,924**
Bank holding companies	**16,658,144**	**6,865,956**	**1,776,671**	**4,602,948**	**d**	**199,809**
Other holding companies	**9,520,097**	**2,545,234**	**411,435**	**342,444**	**d**	**51,445**
Administrative and support and waste management and remediation	**3,018,456**	**3,516,136**	**1,202,844**	**233,429**	**3,615**	**d**
Education services, health care, and social assistance	**32,262**	**25,876**	**6,629**	**7,862**	*** 381**	**0**
Arts, entertainment, and recreation	**101,962**	**75,886**	**28,527**	**31,646**	*** 339**	**0**
Accommodation and food services	**15,937,999**	**2,269,969**	**118,495**	**546,108**	**180,888**	*** 4,541**
Other services	**85,135**	**37,739**	**2,545**	**28,099**	*** 54**	**d**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued				
	Foreign taxes available for credit—continued				
	Foreign taxes paid or accrued—continued				Taxes deemed paid
	Rents, royalties, and license fees	Sales income	Service income	Other income [5]	
	(31)	(32)	(33)	(34)	(35)
All industries	**6,897,665**	**8,669,938**	**2,061,185**	**16,281,014**	**127,911,859**
Agricultural, forestry, fishing and hunting	**d**	**0**	**d**	**d**	*** 45,099**
Mining	**1,106**	**377,626**	**d**	**21,272**	**476,555**
Oil and gas extraction	d	d	0	* 16,856	d
All other mining	d	d	d	* 4,416	d
Utilities	**0**	**d**	**0**	**d**	*** 15,672**
Construction	**d**	**d**	**8,680**	**37,332**	**56,904**
Construction of buildings	0	d	d	* 19,754	11,936
Heavy and civil engineering construction and land subdivision	d	d	* 3,537	d	* 5,437
Specialty trade contractors	0	0	d	d	39,531
Manufacturing	**3,193,898**	**7,249,363**	**279,826**	**8,414,837**	**74,316,964**
Food manufacturing	92,832	* 183,093	317	146,437	9,655,891
Beverage and tobacco products	85,690	d	d	380,478	1,015,335
Paper manufacturing	* 136,850	d	d	92,237	1,958,611
Printing and related support activities	* 1,475	d	d	d	156,290
Petroleum and coal products manufacturing	24,630	6,614,687	d	3,344,478	1,227,495
Chemical manufacturing	1,518,018	201,500	76,121	1,995,288	31,060,816
Pharmaceutical and medicine manufacturing	1,155,804	113,079	379	1,243,609	20,695,991
Other chemical manufacturing	362,214	88,421	75,742	751,678	10,364,825
Plastics and rubber products manufacturing	29,443	* 5,956	d	34,429	466,986
Nonmetallic mineral product manufacturing	d	d	d	* 6,084	126,665
Primary metal manufacturing	* 3,022	d	d	* 2,406	31,014
Fabricated metal products	23,293	16,455	* 1,720	63,111	1,017,082
Machinery manufacturing	118,975	48,478	24,068	286,442	5,017,449
Computer and electronic product manufacturing	354,853	31,139	62,393	606,849	10,104,512
Electrical equipment, appliance and component manufacturing	84,955	6,572	4,555	399,552	2,836,545
Transportation equipment manufacturing	395,871	96,087	62,910	819,885	6,454,799
Motor vehicles and related manufacturing	301,367	69,646	* 3,137	275,105	2,486,875
Other transportation equipment manufacturing	94,504	* 26,442	59,772	544,780	3,967,924
Furniture and related product manufacturing	d	d	d	d	70,131
Miscellaneous manufacturing and manufacturing not allocable	240,294	27,266	2,593	229,238	3,117,342
Wholesale and retail trade	**819,696**	**188,933**	**35,048**	**806,577**	**7,004,797**
Wholesale trade	363,839	163,657	25,517	484,008	5,179,255
Durable goods	228,166	57,122	8,940	166,731	1,819,909
Motor vehicles, parts, supplies	d	d	d	* 2,493	227,775
Electrical goods	103,149	27,501	* 6,181	16,771	854,719
Machinery, equipment, and supplies	* 1,228	15,780	* 666	20,834	230,973
Furniture, sports, toys, recycle, jewelry	d	d	d	4,509	58,560
Other miscellaneous durable goods	116,391	10,775	* 956	122,125	447,883
Nondurable goods	135,673	106,535	16,577	317,276	3,359,346
Drugs and druggists' sundries	37,509	* 26,018	d	113,286	783,976
Apparel, piece goods, and notions	36,414	5,589	d	19,079	937,971
Groceries and related products	d	d	0	* 156,030	1,042,300
Chemicals and allied products	d	d	d	* 10,330	62,105
Other miscellaneous nondurable goods	31,388	* 62,738	* 6,414	18,551	532,994
Retail trade	455,856	25,277	9,533	322,570	1,825,542
Motor vehicle and parts dealers	d	d	0	d	65,280
Miscellaneous retail trade	d	d	9,533	d	1,760,262
Transportation and warehousing	*** 8,040**	**d**	**42,645**	**95,804**	**821,008**

Footnotes at end of table.

Table 1. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Total Assets, Income, Tax, and Credits, and Foreign Income, Deductions, and Taxes Reported on Form 1118 Credit, by Major and Selected Minor Industry—Continued

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

Major and selected minor industry of U.S. corporation filing return	Foreign income, deductions, and taxes reported on Form 1118—continued				
	Foreign taxes available for credit—continued				
	Foreign taxes paid or accrued—continued				Taxes deemed paid
	Rents, royalties, and license fees	Sales income	Service income	Other income [5]	
	(31)	(32)	(33)	(34)	(35)
Information	**2,167,487**	**659,286**	**441,647**	**865,076**	**8,280,423**
Publishing (except internet)	1,267,227	468,297	180,114	145,101	3,418,438
Motion picture and sound recording	d	d	d	* 111,816	* 37,910
Broadcasting, internet publishing	380,904	d	0	65,207	* 60,217
Telecommunications	d	d	d	* 395,797	362,982
Other information services	425,446	d	205,186	147,156	4,400,875
Finance and insurance	**84,319**	**43,358**	**274,218**	**1,372,786**	**18,177,568**
Depository credit intermediation	0	0	d	15,158	* 5,355
Securities, commodity contracts, and other financial investments	* 15,265	d	d	267,376	10,575,835
Insurance and related activities	* 2,035	* 28,951	98,236	762,901	5,574,299
Life insurance	0	d	10,837	553,076	3,697,659
Property and casualty insurance	d	d	50,352	184,620	1,404,503
All other insurance related activities	d	d	* 37,047	* 25,205	472,137
All other finance industries	67,019	d	d	327,351	2,022,080
Real estate and rental and leasing	**122,250**	**d**	*** 9,650**	**13,883**	**836,458**
Professional, scientific, and technical services	**105,784**	**15,019**	**647,050**	**164,902**	**2,144,258**
Bank holding companies	**0**	**d**	**d**	**4,201,827**	**3,372,413**
Other holding companies	*** 86,733**	**d**	**d**	**118,044**	**3,494,590**
Administrative and support and waste management and remediation	**113,309**	**d**	**53,950**	**49,471**	**4,403,294**
Education services, health care, and social assistance	*** 1,576**	**d**	**d**	**d**	**20,243**
Arts, entertainment, and recreation	*** 9,027**	**0**	*** 1,596**	*** 20,684**	*** 6,538**
Accommodation and food services	**177,850**	*** 101,814**	**7,525**	**73,490**	**4,408,398**
Other services	**d**	**d**	**d**	*** 21,451**	**30,677**

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

* Data should be used with caution because of the small number of sample returns on which they were based.

[1] U.S. income tax after the foreign tax credit and other credits, which are not shown separately.

[2] Included in gross income (less loss), columns 9-17.

[3] Total taxes available for credit is the sum of total taxes paid or accrued (column 28), taxes deemed paid (column 35) and carryover of foreign taxes from prior years, less any applicable reductions. Carryover of foreign taxes and applicable reductions are not shown separately.

[4] This calculation does not include the reduction for participation in an international boycott and certain other adjustments. Therefore, the amounts presented in this column may differ slightly from subtracting the foreign tax credit claimed (column 7) from the limitation (column 26). The difference between the foreign tax credit limitation and the foreign tax credit is one way to measure the U.S. tax owed on foreign source corporate income. U.S. tax owed is determined separately by foreign tax credit basket; that is, the foreign tax credit limitation and the allowable foreign tax credit are computed separately for each basket of foreign source income. The Tax Cuts and Jobs Act of 2017 created six baskets of foreign source income, including the general basket, passive basket, GILTI basket, branch basket, section 901j basket, and income resourced by treaty basket. The foreign tax credit limitation is the ratio of foreign source income (after deductions) to total taxable income from all sources multiplied by the total U.S. income tax against which the credit is allowed. Foreign taxes deemed paid in the GILTI basket are reduced by 20 percent before computing allowable foreign tax credits. A problem with this measure of the U.S. tax owed on foreign source corporate income is that it relies on the definition of foreign source income contained in the tax code. Thus, it assumes that the allocation of expenses to foreign source income accurately reflects the cost, which is not necessarily the case. Further, current law allows expenses allocable to foreign source income to be deducted even when all of the income associated with those expenses is deferred.

[5] Includes taxes on distributions of previously taxed income and branch remittances, in addition to other taxes not attributable to dividends, interest, rents, royalties, license fees, sales income or service income.

NOTES: Detail may not add to totals because of rounding. Columns 2 through 8 present statistics on assets, receipts, income, and taxes reported on Form 1120 *(Corporation Income Tax Return)* series for corporations claiming a foreign tax credit. Columns 9 through 35 present statistics from Form 1118, *Foreign Tax Credit—Corporations*. Adjustments to foreign-source taxable income (reported in column 23) include allocations of current-year U.S.-source losses and recapture of foreign losses, as well as other adjustments. These adjustments (reported on Schedule J) affect the numerator of the limitation fraction used to compute the foreign tax credit. The foreign-source taxable income (less loss) after adjustments (the numerator of the limitation fraction) is reported in column 24. The limitation fraction, which represents the ratio of foreign-source taxable income after adjustments to total (U.S. and foreign) taxable income after adjustments, is applied to the total U.S. tax against which the credit is allowed to determine any limitation on the foreign tax credit.

SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit, December 2021.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118					
		Gross income (less loss)					
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Sales income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
All geographic areas	**9,821**	**1,705,182,720**	**1,024,456,314**	**102,009,684**	**86,403,012**	**155,460,701**	**141,974,060**
Canada	**2,443**	**24,064,873**	**1,193,119**	**181,243**	**4,844,186**	**5,622,487**	**5,223,152**
Latin America, total	**1,793**	**44,265,171**	**5,578,860**	**810,582**	**8,044,480**	**6,411,275**	**13,160,576**
Mexico	1,205	16,655,576	1,490,425	197,035	903,066	2,602,406	7,501,870
Central America, total	344	1,525,051	170,900	24,938	215,548	387,529	157,327
Costa Rica	195	461,654	d	*1,111	28,483	177,246	38,479
El Salvador	117	186,684	d	d	28,818	31,362	14,517
Guatemala	158	196,019	14,197	d	37,033	46,403	37,893
Honduras	118	113,319	7,942	d	5,516	19,011	14,866
Nicaragua	79	43,678	d	d	*8,284	7,283	d
Panama	204	492,619	67,978	*19,482	81,818	106,098	51,974
Other Central American countries	34	31,077	d	0	*25,596	*126	d
Caribbean countries, total	430	8,656,639	3,338,370	435,418	3,562,406	385,696	178,776
Barbados	98	1,245,144	1,059,266	d	63,541	40,686	*15,866
Cayman Islands	229	6,831,901	2,269,747	429,015	3,398,269	248,651	61,584
Dominican Republic	215	270,264	d	d	68,002	56,141	60,203
Haiti	31	11,444	0	0	*2,661	433	*3,295
Jamaica	87	92,062	d	d	15,359	14,691	1,850
Trinidad	94	176,460	*2,698	d	11,090	24,617	35,680
Other Caribbean countries	39	29,364	0	0	*3,484	477	*298
South America, total	967	17,427,905	579,165	153,191	3,363,459	3,035,643	5,322,603
Argentina	342	3,120,052	107,855	12,256	698,335	543,444	655,191
Bolivia	79	359,231	d	0	1,757	14,049	9,572
Brazil	691	8,720,086	273,979	110,906	1,946,176	1,452,948	2,400,462
Chile	343	1,303,512	113,693	13,482	321,723	441,241	181,015
Colombia	362	1,433,723	11,145	5,852	130,203	256,550	668,686
Ecuador	151	193,084	d	d	45,847	96,136	11,312
Paraguay	84	94,507	d	d	41,079	27,437	6,285
Peru	253	1,809,160	9,661	d	92,602	143,638	1,344,892
Uruguay	138	191,957	30,162	d	61,534	26,622	17,462
Venezuela	100	159,600	20,462	d	19,582	30,296	25,780
Other South American countries	38	42,994	d	0	*4,620	3,282	*1,947
Other Western Hemisphere, total	**308**	**10,004,401**	**4,610,054**	**85,682**	**1,272,772**	**1,521,495**	**1,398,914**
Bahamas	99	1,788,028	757,468	d	555,956	28,098	56,798
Bermuda	182	7,090,049	3,557,209	83,500	498,399	997,867	1,312,576
British Virgin Islands	77	444,203	276,297	d	102,878	*1,241	*21,388
Curacao	51	507,411	10,711	d	*2,510	479,929	d
All other Western Hemisphere countries	105	174,710	*8,369	d	113,029	14,359	d
Europe, total	**2,175**	**211,153,454**	**57,400,848**	**9,479,460**	**22,246,848**	**48,402,208**	**24,791,240**
European Union, total	2,093	172,363,186	50,662,750	8,652,892	20,683,248	33,094,441	15,572,840
Austria	227	1,053,972	158,308	14,354	191,820	143,011	129,926
Belgium	380	3,307,873	826,321	189,907	196,231	728,027	385,264
Czech Republic	196	393,426	9,689	1,032	2,950	103,500	149,071
Denmark	244	973,331	128,683	47,549	44,873	187,167	282,679
Finland	187	266,880	11,330	*1,146	27,995	68,144	38,227
France	674	6,080,603	438,805	40,814	906,205	1,291,879	1,704,733

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118					
		Gross income (less loss)					
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Sales income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Germany	661	19,403,011	1,728,458	1,731,290	684,791	2,325,373	3,452,740
Greece	127	158,137	*3,465	d	9,412	46,169	19,889
Hungary	167	689,470	14,909	786	17,315	273,073	181,289
Ireland	429	28,424,649	11,556,736	1,472,665	1,043,046	11,567,250	246,211
Italy	448	2,244,938	98,990	9,849	142,878	592,364	423,562
Luxembourg	307	15,744,946	7,993,561	1,982,768	2,263,510	926,068	276,887
Netherlands	819	31,452,357	21,945,890	2,439,927	1,634,448	5,099,878	1,124,897
Poland	281	1,155,943	36,018	6,586	54,511	208,176	511,155
Portugal	223	293,307	23,178	*6,984	4,419	80,768	48,688
Romania	139	103,948	*4,016	d	11,797	55,953	15,525
Spain	494	2,483,705	98,096	10,062	697,130	383,385	339,226
Sweden	307	2,347,831	340,774	125,048	110,745	264,033	250,920
United Kingdom	1,310	54,894,768	5,104,704	563,488	12,604,430	8,638,068	5,609,933
Other European Union countries	222	890,090	140,820	7,331	34,742	112,157	382,017
Other European countries, total	722	38,790,269	6,738,098	826,568	1,563,600	15,307,768	9,218,400
Jersey	56	905,471	d	d	627,383	*19,034	d
Kazakhstan	112	3,622,754	d	d	76,445	22,785	3,389,580
Norway	208	3,740,182	322,061	*522	133,104	78,215	2,979,931
Russia	259	2,052,903	35,834	5,806	120,127	420,238	667,726
Switzerland	451	27,092,775	5,955,401	797,249	389,318	14,377,383	1,883,273
Turkey	229	671,167	29,098	3,059	99,795	198,183	271,125
Ukraine	109	304,866	d	d	3,528	42,869	d
All other European countries	180	400,149	85,094	*962	113,900	149,060	2,170
Africa, total	**454**	**7,092,092**	**305,991**	**62,115**	**1,178,733**	**1,441,246**	**2,846,492**
Algeria	50	109,595	*17,768	d	d	98,242	-62,442
Angola	31	194,316	d	d	*51,506	3,710	*63,513
Chad	19	96,672	d	0	d	*227	d
Egypt	119	2,145,097	35,211	*555	241,502	771,331	1,022,603
Equatorial Guinea	17	338,069	0	0	d	d	*319,962
Gabon	28	48,211	d	0	*2,738	*42,249	d
Mauritius	75	328,591	68,684	*15,784	98,840	d	*10,323
Nigeria	88	1,460,934	67,167	d	67,741	d	1,047,324
South Africa	296	1,271,153	72,474	17,498	394,910	307,227	136,939
Other African countries	221	1,099,454	19,689	2,202	263,646	205,626	224,526
Asia, total	**2,260**	**127,169,502**	**6,950,831**	**1,153,154**	**11,740,342**	**18,548,189**	**44,447,592**
Middle East, total	550	20,991,366	449,846	51,152	894,434	814,605	14,281,737
Bahrain	79	257,666	d	d	56,118	32,216	d
Iraq	47	757,388	d	d	*5,826	d	160,735
Israel	268	1,370,820	217,822	40,375	105,506	456,909	216,502

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118					
		Gross income (less loss)					
		Total	Dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Sales income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Kuwait	88	302,173	d	d	6,102	28,329	19,471
Lebanon	61	28,589	d	d	*7,943	1,356	6,566
Qatar	137	13,215,447	*49,059	d	67,860	23,452	11,240,120
Saudi Arabia	175	2,493,548	*18,594	*1,413	68,331	167,626	1,826,368
United Arab Emirates	284	2,402,100	139,168	2,741	545,089	88,558	779,025
Yemen	10	*212	0	0	0	d	d
Other Middle East countries	103	163,422	8,725	d	31,659	9,748	31,685
Southern and Southeast Asia, total	1,228	43,188,782	3,612,082	368,343	5,443,286	5,283,335	12,401,220
Bangladesh	40	67,012	0	0	*23,358	5,827	5,072
India	787	13,957,323	306,421	108,725	2,300,697	1,466,811	1,660,839
Indonesia	268	2,922,152	117,123	3,572	545,730	122,700	1,773,720
Malaysia	333	2,901,064	53,163	14,686	105,384	239,577	2,280,969
Pakistan	85	281,236	d	d	69,622	24,093	94,367
Philippines	306	2,006,618	248,174	3,134	423,548	256,484	243,112
Singapore	643	16,451,102	2,662,728	228,332	1,522,291	2,461,682	5,233,328
Sri Lanka	62	50,660	d	d	21,866	3,257	3,994
Thailand	323	2,245,803	192,585	5,432	346,888	432,524	760,889
Vietnam	138	353,032	9,747	d	69,938	68,910	97,491
Other Southern and Southeast Asian countries	125	1,952,780	d	d	13,965	201,470	247,440
Eastern Asia, total	1,796	62,989,355	2,888,903	733,658	5,402,622	12,450,249	17,764,635
China	908	13,308,185	1,253,152	163,721	385,653	4,574,650	4,999,741
Hong Kong	610	12,892,847	1,049,955	467,835	1,197,709	621,741	5,355,889
Japan	1,076	26,351,961	368,213	60,835	3,420,364	4,293,983	3,275,305
South Korea, Republic of	482	5,423,599	149,920	24,482	289,161	2,283,394	1,012,274
Taiwan	393	5,005,251	d	d	105,800	674,471	3,119,482
Other Eastern Asian countries	41	7,512	d	d	*3,934	2,010	*1,944
Oceania, total	**773**	**11,479,736**	**2,984,458**	**43,134**	**2,510,135**	**1,314,719**	**1,201,333**
Australia	715	10,339,790	2,674,702	39,557	2,352,743	1,212,800	1,052,698
New Zealand	285	568,092	15,258	d	129,669	94,874	110,348
Other countries of Oceania	74	571,853	*294,498	d	27,724	7,045	38,288
Puerto Rico and U.S. Possessions, total	**471**	**16,150,772**	**47,067**	***2,412**	**452,644**	**10,635,639**	**1,617,951**
Puerto Rico	399	15,288,283	17,421	d	360,741	10,623,005	d
U.S. Possessions, total	174	862,490	*29,646	d	91,904	12,635	d
American Samoa	22	32,961	d	d	d	d	d
Guam	102	449,525	d	d	68,892	9,358	d
Virgin Islands, U.S.	111	363,660	d	0	10,068	d	86,059
Other U.S. Possessions	29	16,344	0	0	d	*131	d
Country not stated	**5,002**	**232,726,372**	**13,598,373**	**1,457,746**	**33,724,301**	**61,563,441**	**47,286,810**
Regulated Investment Company Income [4]	**136**	**1,462,072**	**1,210,107**	***40,934**	**0**	**0**	**0**
Global Intangible Low-Taxed Income (GILTI) [4] [5]	**2,842**	**375,391,545**	**328,038,785**	**47,008,312**	**388,571**	**0**	**0**
Section 965 income [4]	**269**	**644,222,730**	**602,537,821**	**41,684,909**	**0**	**0**	**0**

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Gross income (less loss)—continued					Total deductions	Taxable income (less loss) before adjustments
	Service income	Section 986(c), 987, and 988 gain or loss	Other income	Oil and gas extraction income [2]	Foreign branch income [2]		
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
All geographic areas	**64,032,512**	**-3,492,003**	**134,338,440**	**56,113,069**	**206,468,071**	**937,594,727**	**767,587,994**
Canada	**2,647,320**	**-222,595**	**4,575,961**	***836,821**	**7,849,371**	**14,582,240**	**9,482,633**
Latin America, total	**4,457,078**	**-175,615**	**5,977,935**	***885,047**	**11,958,226**	**25,892,692**	**18,372,480**
Mexico	972,568	15,740	2,972,466	d	2,969,323	9,649,188	7,006,388
Central America, total	236,399	*-1,033	333,443	d	371,747	873,067	651,983
Costa Rica	104,589	d	42,124	d	41,641	253,507	208,147
El Salvador	23,954	d	76,733	d	70,243	106,727	79,956
Guatemala	16,887	d	41,133	d	51,935	118,219	77,800
Honduras	16,752	d	48,597	d	51,228	59,263	54,056
Nicaragua	9,836	0	18,696	0	d	16,247	27,432
Panama	59,291	0	105,977	d	139,893	300,427	192,192
Other Central American countries	*5,089	0	*184	0	d	18,678	12,400
Caribbean countries, total	242,815	-76,096	589,254	d	1,011,843	3,629,398	5,027,241
Barbados	9,344	d	53,899	d	*50,451	253,708	991,436
Cayman Islands	134,477	-74,959	365,118	d	732,447	3,013,079	3,818,822
Dominican Republic	32,847	d	47,480	d	103,198	179,989	90,275
Haiti	*1,238	0	3,818	0	d	9,505	1,940
Jamaica	36,294	d	21,633	0	27,256	67,886	24,175
Trinidad	4,551	d	96,266	d	93,654	86,862	89,598
Other Caribbean countries	24,065	0	*1,040	0	d	18,369	10,995
South America, total	3,005,296	-114,225	2,082,772	*671,129	7,605,313	11,741,038	5,686,867
Argentina	197,577	-5,494	910,889	d	1,770,078	2,010,975	1,109,077
Bolivia	324,433	d	8,665	d	*324,107	294,628	64,602
Brazil	2,011,519	-94,263	618,359	d	3,168,913	5,973,925	2,746,160
Chile	89,520	-9,211	152,050	d	231,152	770,309	533,203
Colombia	223,191	-3,991	142,085	d	631,833	991,753	441,970
Ecuador	12,555	0	18,853	d	*58,241	160,291	32,793
Paraguay	*2,420	d	11,659	d	d	43,829	50,678
Peru	d	352	88,690	d	1,278,514	1,143,615	665,544
Uruguay	d	*-1,484	50,705	d	*65,780	121,483	70,474
Venezuela	d	d	55,428	d	55,561	189,459	-29,859
Other South American countries	d	0	25,389	d	d	40,769	2,225
Other Western Hemisphere, total	**147,162**	**-73,314**	**1,041,636**	**d**	**241,018**	**5,625,351**	**4,379,050**
Bahamas	49,601	d	356,978	d	*108,420	1,737,231	50,797
Bermuda	61,957	*-55,294	633,835	d	61,166	3,287,684	3,802,365
British Virgin Islands	*3,057	d	38,180	0	55,132	320,858	123,345
Curacao	*12,042	d	*1,298	0	d	204,989	302,422
All other Western Hemisphere countries	20,505	d	11,345	d	d	74,589	100,121
Europe, total	**16,139,554**	**-1,949,577**	**34,642,872**	***15,123,596**	**59,070,419**	**120,987,991**	**90,165,463**
European Union, total	14,930,939	-1,843,363	30,609,438	*8,501,984	47,048,913	105,913,700	66,449,486
Austria	31,954	-5,240	389,839	d	252,192	580,522	473,450
Belgium	165,850	-22,842	839,115	d	674,768	2,012,274	1,295,599
Czech Republic	92,518	*-2,097	36,763	d	205,121	205,201	188,225
Denmark	266,892	-10,794	26,283	d	577,707	490,996	482,335
Finland	48,107	*-364	72,294	0	48,221	191,177	75,703
France	638,324	60,469	999,373	d	1,952,152	3,684,016	2,396,587

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Gross income (less loss)—continued					Total deductions	Taxable income (less loss) before adjustments
	Service income	Section 986(c), 987, and 988 gain or loss	Other income	Oil and gas extraction income [2]	Foreign branch income [2]		
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Germany	7,734,207	-140,186	1,886,338	d	9,748,801	14,354,807	5,048,204
Greece	77,200	d	1,533	d	77,031	106,979	51,158
Hungary	110,045	*3,505	88,548	d	160,847	443,644	245,825
Ireland	1,315,887	33,932	1,188,922	d	1,137,929	10,764,618	17,660,031
Italy	403,081	-6,202	580,417	d	930,686	1,581,383	663,555
Luxembourg	31,184	-312,163	2,583,131	d	2,394,719	6,818,667	8,926,279
Netherlands	328,286	-642,649	-478,319	d	159,935	16,483,263	14,969,094
Poland	230,852	*-5,136	113,780	d	314,176	1,292,399	-136,456
Portugal	94,203	*-142	35,208	d	125,695	146,452	146,855
Romania	6,381	d	9,811	d	*6,816	51,320	52,628
Spain	433,024	5,328	517,455	d	1,258,031	1,901,828	581,876
Sweden	73,523	-34,383	1,217,172	d	289,281	1,767,670	580,161
United Kingdom	2,647,135	-761,132	20,488,142	d	26,278,213	42,225,461	12,669,307
Other European Union countries	202,285	-2,893	13,633	d	456,592	811,023	79,067
Other European countries, total	1,208,615	-106,214	4,033,433	*6,621,612	12,021,506	15,074,291	23,715,978
Jersey	0	d	-61,507	0	d	293,468	612,003
Kazakhstan	104,612	*-45,178	74,241	d	3,526,175	1,275,439	2,347,315
Norway	42,916	*-6,704	190,138	d	3,088,353	1,123,278	2,616,904
Russia	423,078	-5,781	385,874	d	1,230,126	1,162,581	890,321
Switzerland	391,199	-21,751	3,320,703	d	3,505,739	10,377,059	16,715,717
Turkey	25,642	*-9,107	53,371	d	234,912	436,728	234,439
Ukraine	176,333	d	51,147	0	d	227,018	77,848
All other European countries	44,835	*-15,339	19,468	d	62,638	178,719	221,430
Africa, total	**359,612**	**-54,153**	**952,055**	**d**	**4,094,640**	**4,108,185**	**2,983,907**
Algeria	10,294	d	-10,485	d	*47,180	153,039	-43,444
Angola	*5,225	d	23,713	d	*94,236	302,889	-108,573
Chad	d	0	*2,199	d	d	52,182	44,490
Egypt	32,963	*-7,603	48,535	d	1,222,266	1,293,836	851,261
Equatorial Guinea	d	d	*14,817	d	*330,327	194,062	144,007
Gabon	*3,591	d	*300	d	d	27,783	20,427
Mauritius	d	d	118,910	d	*155,836	179,524	149,067
Nigeria	10,984	d	262,980	d	1,077,372	400,338	1,060,597
South Africa	59,193	-41,143	324,056	d	711,545	754,501	516,652
Other African countries	218,622	-1,887	167,030	d	366,087	750,032	349,422
Asia, total	**12,926,421**	**-20,888**	**31,423,861**	***17,137,171**	**66,866,274**	**80,786,545**	**46,382,958**
Middle East, total	1,654,940	-8,064	2,852,715	d	18,043,464	10,800,651	10,190,714
Bahrain	141,095	d	24,851	d	176,282	291,149	-33,482
Iraq	508,519	0	60,518	d	476,025	621,331	136,057
Israel	152,610	*-1,745	182,842	d	462,414	633,521	737,299

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Gross income (less loss)—continued					Total deductions	Taxable income (less loss) before adjustments
	Service income	Section 986(c), 987, and 988 gain or loss	Other income	Oil and gas extraction income [2]	Foreign branch income [2]		
	(8)	(9)	(10)	(11)	(12)	(13)	(14)
Kuwait	140,232	d	105,756	0	87,533	164,149	138,023
Lebanon	3,476	d	d	d	d	26,168	2,421
Qatar	142,491	d	1,693,665	d	13,011,285	4,855,313	8,360,134
Saudi Arabia	254,097	*-2,045	159,165	d	1,913,785	2,261,191	232,357
United Arab Emirates	262,156	*-571	585,934	d	1,843,524	1,826,028	576,072
Yemen	d	0	d	0	0	158	54
Other Middle East countries	50,266	d	31,184	0	d	121,642	41,781
Southern and Southeast Asia, total	8,716,604	-72,381	7,436,292	*2,588,008	20,554,901	29,059,406	14,129,376
Bangladesh	d	d	30,274	0	d	42,032	24,980
India	5,299,017	-34,367	2,849,181	d	6,037,807	11,011,512	2,945,811
Indonesia	53,400	225	305,682	*1,814,773	2,499,640	1,905,254	1,016,898
Malaysia	49,439	-24,813	182,659	d	801,169	1,242,588	1,658,475
Pakistan	d	d	83,220	d	209,089	170,674	110,562
Philippines	279,573	-4,581	557,174	d	1,237,205	1,544,334	462,284
Singapore	1,606,173	-25,102	2,761,671	d	7,222,167	9,659,342	6,791,760
Sri Lanka	d	d	*9,662	0	d	28,392	22,268
Thailand	70,836	16,560	420,089	d	1,304,356	1,748,130	497,673
Vietnam	15,769	d	91,231	d	202,274	295,172	57,860
Other Southern and Southeast Asian countries	1,333,090	d	145,447	d	971,981	1,411,976	540,804
Eastern Asia, total	2,554,877	59,557	21,134,854	d	28,267,909	40,926,488	22,062,867
China	393,888	-13,530	1,550,910	d	3,333,592	7,909,627	5,398,558
Hong Kong	723,431	-7,386	3,483,673	d	5,780,238	7,354,187	5,538,660
Japan	739,060	-13,904	14,208,104	d	16,199,097	19,329,058	7,022,903
South Korea, Republic of	185,903	111,543	1,366,922	d	d	3,370,890	2,052,709
Taiwan	512,316	-17,167	525,985	d	1,532,964	2,960,358	2,044,893
Other Eastern Asian countries	*279	0	*-739	d	d	2,368	5,144
Oceania, total	**d**	**d**	**2,572,679**	**d**	**3,817,815**	**8,299,527**	**3,180,209**
Australia	882,486	-151,906	2,276,711	d	3,423,640	7,399,227	2,940,563
New Zealand	d	d	179,709	d	250,793	385,395	182,698
Other countries of Oceania	d	d	116,259	d	143,381	514,906	56,947
Puerto Rico and U.S. Possessions, total	**d**	**d**	**1,115,296**	**d**	**3,295,907**	**6,567,595**	**9,583,177**
Puerto Rico	d	d	794,936	d	2,970,199	5,933,035	9,355,247
U.S. Possessions, total	164,216	0	320,360	d	325,708	634,560	227,930
American Samoa	d	0	*2,131	0	d	2,214	30,747
Guam	129,116	0	96,276	d	216,873	370,033	79,492
Virgin Islands, U.S.	31,005	0	204,079	0	70,500	251,314	112,345
Other U.S. Possessions	3,440	0	17,875	0	d	10,999	5,346
Country not stated	**24,064,266**	**-722,311**	**51,753,746**	***13,466,766**	**49,274,400**	**158,461,615**	**74,264,757**
Regulated Investment Company Income [4]	**0**	**0**	***211,030**	**0**	**0**	***913,466**	**548,605**
Global Intangible Low-Taxed Income (GILTI) [4] [5]	**0**	**-115,491**	***71,368**	**d**	**0**	**210,412,511**	**164,979,034**
Section 965 income [4]	**0**	**0**	**0**	**d**	**0**	**300,957,009**	**343,265,721**

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes paid or accrued on—						
	Total	Dividends	Interest	Rents, royalties, and license fees	Sales income	Service income	Other income [3]
	(15)	(16)	(17)	(18)	(19)	(20)	(21)
All geographic areas	**36,185,068**	**1,370,514**	**904,752**	**6,897,665**	**8,669,938**	**2,061,185**	**16,281,014**
Canada	**1,503,349**	**239,671**	**10,234**	**361,175**	**119,776**	**109,506**	**662,988**
Latin America, total	**3,700,243**	**17,168**	**204,828**	**997,731**	**645,265**	**373,488**	**1,461,763**
Mexico	774,972	2,642	70,248	261,040	57,439	51,292	332,312
Central America, total	146,462	2,647	3,133	54,917	*10,741	9,624	65,400
Costa Rica	37,808	0	*436	24,101	*3,925	2,183	7,162
El Salvador	23,952	d	d	8,354	d	465	14,298
Guatemala	26,832	*948	*337	7,828	*3,123	2,045	12,551
Honduras	d	d	d	7,749	d	*2,804	5,425
Nicaragua	8,726	0	d	2,331	d	d	4,612
Panama	30,805	d	*2,126	4,555	d	*699	21,353
Other Central American countries	d	d	0	0	0	d	0
Caribbean countries, total	72,500	*267	535	14,510	4,066	7,388	45,735
Barbados	9,204	0	d	d	d	d	7,979
Cayman Islands	d	d	0	0	d	0	d
Dominican Republic	46,745	d	d	8,598	*2,332	5,044	30,361
Haiti	d	0	0	0	0	0	d
Jamaica	5,900	d	d	1,999	0	*1,326	2,502
Trinidad	10,256	0	d	3,693	d	d	4,591
Other Caribbean countries	d	0	0	d	0	d	0
South America, total	2,706,309	11,613	130,912	667,263	573,019	305,185	1,018,317
Argentina	621,477	d	d	191,777	57,666	15,823	341,182
Bolivia	10,599	0	d	4,778	d	d	4,459
Brazil	958,424	7,601	99,976	187,862	135,110	236,139	291,735
Chile	268,045	*927	4,743	141,987	31,706	9,837	78,845
Colombia	220,196	d	d	67,826	7,232	22,087	114,428
Ecuador	44,088	d	d	23,639	*8,170	1,804	10,281
Paraguay	16,121	d	d	5,703	*4,475	d	d
Peru	538,692	*249	3,241	40,481	323,989	16,095	154,637
Uruguay	20,889	d	d	2,149	*3,359	545	14,212
Venezuela	7,219	0	d	d	d	0	d
Other South American countries	*558	0	d	d	0	d	0
Other Western Hemisphere, total	**3,988**	**d**	**d**	**2,116**	**d**	***159**	**1,612**
Bahamas	d	0	0	0	0	d	d
Bermuda	d	d	0	d	0	0	*-51
British Virgin Islands	d	0	d	0	0	d	d
Curacao	d	0	0	d	0	d	0
All other Western Hemisphere countries	3,562	d	d	2,064	d	d	d
Europe, total	**7,577,550**	**261,149**	**131,739**	**763,969**	**2,868,293**	**540,006**	**3,012,395**
European Union, total	3,740,459	137,653	123,027	641,134	122,240	489,573	2,226,832
Austria	25,514	*1,020	*4,766	*7,218	*155	*986	11,368
Belgium	164,704	7,831	d	*1,297	d	*953	129,120
Czech Republic	18,166	d	d	5,072	d	d	5,789
Denmark	159,462	3,243	0	d	d	*10,962	140,987
Finland	3,213	1,006	d	d	d	*266	1,215
France	203,626	20,059	*320	46,184	4,047	12,332	120,683

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes paid or accrued on—						
	Total	Dividends	Interest	Rents, royalties, and license fees	Sales income	Service income	Other income [3]
	(15)	(16)	(17)	(18)	(19)	(20)	(21)
Germany	669,367	9,160	*12,173	8,027	30,701	313,878	295,429
Greece	3,301	d	0	*229	*120	d	*2,326
Hungary	25,239	0	d	d	d	d	*1,347
Ireland	524,542	51,949	d	*421,627	*1,591	d	39,581
Italy	116,085	6,659	5,470	32,568	15,650	7,700	48,038
Luxembourg	76,901	2,444	*1,571	*1,084	d	d	70,071
Netherlands	262,295	12,396	10,905	3,162	21,136	33,228	181,468
Poland	59,157	*76	0	21,578	*6,983	*1,522	28,999
Portugal	19,207	d	d	5,269	d	*2,096	10,518
Romania	13,549	d	d	7,027	d	d	*3,134
Spain	162,049	7,511	8,962	23,440	*12,189	5,415	104,532
Sweden	72,285	2,517	0	d	*1,343	d	60,044
United Kingdom	1,144,138	8,702	23,880	41,200	17,799	89,729	962,829
Other European Union countries	17,660	d	d	4,665	*1,534	d	9,354
Other European countries, total	3,837,091	123,496	8,712	122,835	2,746,052	50,433	785,563
Jersey	*12,924	d	d	0	0	0	d
Kazakhstan	820,427	d	d	d	d	*26,783	*39,185
Norway	2,009,041	1,525	d	d	*1,906,192	*157	98,681
Russia	129,251	2,332	d	*1,956	64,792	*15,318	43,344
Switzerland	768,845	117,297	d	95,632	*375	*2,496	552,288
Turkey	72,333	*1,624	d	14,504	*17,239	*5,160	33,699
Ukraine	14,918	0	0	d	d	d	d
All other European countries	9,351	d	d	3,668	d	d	2,937
Africa, total	**2,197,835**	**4,546**	**9,084**	**94,529**	**1,322,589**	**10,562**	**756,526**
Algeria	*31,336	0	0	d	d	d	d
Angola	17,088	d	d	*33	d	d	*15,458
Chad	d	0	0	d	d	0	d
Egypt	384,610	d	d	63,535	d	*131	313,706
Equatorial Guinea	*115,299	0	d	0	d	0	d
Gabon	d	0	0	d	0	d	d
Mauritius	2,338	d	d	d	d	d	d
Nigeria	1,322,269	d	d	*484	d	*258	*234,171
South Africa	105,950	3,079	d	1,945	*1,200	d	96,519
Other African countries	127,667	*453	1,787	19,403	27,280	8,249	70,494
Asia, total	**8,599,010**	**115,487**	**126,893**	**1,343,332**	**3,020,581**	**304,466**	**3,688,250**
Middle East, total	3,041,489	11,029	5,595	66,043	2,222,769	41,883	694,170
Bahrain	d	d	0	0	0	0	d
Iraq	*8,760	0	0	d	d	d	d
Israel	136,689	5,905	*1,229	46,565	*2,214	15,703	65,074

Footnotes at end of table.

Table 2. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118, by Selected Country—Continued

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

Selected country	Foreign income, deductions, and taxes reported on Form 1118—continued						
	Foreign taxes paid or accrued on—						
	Total	Dividends	Interest	Rents, royalties, and license fees	Sales income	Service income	Other income [3]
	(15)	(16)	(17)	(18)	(19)	(20)	(21)
Kuwait	9,818	0	0	2,891	0	*829	6,098
Lebanon	2,528	0	0	145	d	d	*2,220
Qatar	2,569,484	0	d	535	d	*335	503,546
Saudi Arabia	216,312	d	d	14,605	*118,450	15,122	62,333
United Arab Emirates	88,276	0	d	*199	d	*3,120	46,345
Yemen	d	0	0	d	0	0	d
Other Middle East countries	9,416	d	d	1,107	d	*952	*6,679
Southern and Southeast Asia, total	2,928,572	29,581	32,914	455,080	560,240	158,910	1,691,848
Bangladesh	*13,913	d	0	d	0	d	d
India	1,198,559	3,924	17,141	164,424	37,804	113,174	862,092
Indonesia	589,778	2,018	*1,765	14,705	260,191	846	310,252
Malaysia	210,878	0	*1,166	18,135	171,078	2,685	17,814
Pakistan	45,860	d	d	*1,387	0	*1,796	42,392
Philippines	194,689	1,336	5,166	25,040	5,344	13,410	144,393
Singapore	322,389	*9,393	6,371	138,241	19,779	9,804	138,802
Sri Lanka	8,753	d	0	d	d	d	*7,247
Thailand	278,483	8,324	1,119	80,402	55,495	3,840	129,304
Vietnam	49,047	d	d	11,301	*9,439	*841	25,436
Other Southern and Southeast Asian countries	16,224	d	d	718	d	*12,119	d
Eastern Asia, total	2,628,949	74,878	88,384	822,210	237,572	103,674	1,302,232
China	868,306	38,004	20,022	386,344	70,807	28,233	324,895
Hong Kong	262,146	*7,115	*3,714	38,532	7,423	25,209	180,153
Japan	634,612	13,340	43,404	d	94,329	d	435,367
South Korea, Republic of	550,041	5,065	14,753	284,630	5,280	3,984	236,328
Taiwan	312,719	11,353	d	103,420	59,733	d	125,307
Other Eastern Asian countries	*1,125	0	d	d	0	d	*181
Oceania, total	**531,325**	**94,822**	**68,656**	**42,079**	**16,602**	**40,154**	**269,012**
Australia	498,814	94,497	66,471	37,669	13,348	38,221	248,609
New Zealand	28,455	d	2,185	3,858	d	d	19,654
Other countries of Oceania	4,056	d	0	*552	d	d	*749
Puerto Rico and U.S. Possessions, total	**1,473,686**	**996**	**12,456**	**908,318**	**80,210**	**149,088**	**322,619**
Puerto Rico	1,458,700	d	d	908,296	77,116	147,050	312,825
U.S. Possessions, total	14,986	d	d	d	3,093	2,038	9,794
American Samoa	d	d	d	d	d	0	d
Guam	9,638	d	0	d	*759	1,518	7,303
Virgin Islands, U.S.	d	0	d	0	d	d	1,996
Other U.S. Possessions	d	0	0	0	0	d	d
Country not stated	**10,125,231**	**d**	**d**	**2,384,416**	**d**	**533,756**	**6,091,687**
Regulated Investment Company Income [4]	**57,724**	**45,619**	**0**	**0**	**0**	**0**	***12,105**
Global Intangible Low-Taxed Income (GILTI) [4] [5]	**182,254**	**180,197**	**0**	**0**	**0**	**0**	**2,057**
Section 965 income [4]	***232,871**	***232,871**	**0**	**0**	**0**	**0**	**0**

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

* Data should be used with caution because of the small number of sample returns on which they were based.

[1] Total number of returns may not equal the sum of returns for specific areas because a return could include two or more countries.

[2] Included in gross income (less loss), columns 2-10. For informational purposes, these items are shown separately in columns 11 and 12.

[3] Includes taxes on distributions of previously taxed income and branch remittances, in addition to other taxes not attributable to dividends, interest, rents, royalties, license fees, sales income or service income.

[4] These types of income are not required to be reported by country on Form 1118.

[5] U.S. shareholders of controlled foreign corporations (CFCs) are required to include certain income from the CFCs in their gross income under the GILTI provisions.

NOTE: Detail may not add to totals because of rounding. Form 1118 is entitled *Foreign Tax Credit—Corporations*.

SOURCE: IRS, Statistics of Income Division, Corporation Foreign Tax Credit Study, December 2021.

Table 3. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118 by Type of Foreign Income for Which Separate Credit Was Computed

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

Category of foreign income for which separate credit was computed	Number of returns [1]	Foreign income, deductions, and taxes reported on Form 1118							
		Gross income (less loss)							
		Total	Inclusions under sections 951(a)(1) and 951A [2]	Other dividends	Foreign dividend income from foreign taxes deemed paid (gross-up)	Interest	Rents, royalties, and license fees	Sales income	Service income
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
All income types	9,821	1,705,182,720	991,318,772	33,137,543	102,009,684	86,403,012	155,460,701	141,974,060	64,032,512
Passive income	5,106	39,961,087	29,331,041	1,354,368	1,401,142	4,937,101	1,335,531	0	0
General limitation income	4,096	1,081,614,711	632,705,681	31,744,511	53,487,864	51,997,163	146,160,315	78,076,843	34,861,982
Section 901(j) income [5]	10	15,013	* 7,478	d	d	d	0	d	d
Income resourced by treaty	149	5,544,478	1,439,945	d	127,672	1,068,467	* 340,828	d	d
Section 951A income [6]	2,840	375,161,339	327,827,643	0	46,989,557	d	0	0	0
Foreign branch Income	1,269	202,886,092	* 6,983	d	d	28,011,709	7,624,027	63,655,971	28,420,466

Category of foreign income for which separate credit was computed	Foreign income, deductions, and taxes reported on Form 1118—continued								
	Gross income (less loss)—continued								
	Sections 986c, 987, and 988 gain or loss	Other income	Oil and gas extraction income [3]	Foreign branch income [3]	Section 250 deductions [4]	Other deductions allocable to specific types of income	Deductions not allocable to specific types of income	Net operating loss deduction	Total deductions
	(10)	(11)	(12)	(13)	(14)	(15)	(16)	(17)	(18)
All income types	-3,492,003	134,338,440	56,113,069	206,468,071	205,885,201	525,733,831	204,676,877	1,298,816	937,594,727
Passive income	-478,761	2,080,665	d	d	367,015	1,973,510	13,179,303	233,592	15,753,421
General limitation income	-2,350,380	54,930,731	* 6,016,094	d	20,258,420	422,933,045	112,653,738	960,103	556,805,306
Section 901(j) income [5]	d	d	0	0	d	d	* 6,190	d	6,256
Income resourced by treaty	d	1,548,482	0	0	d	d	1,935,575	d	3,128,777
Section 951A income [6]	-115,800	d	d	0	185,127,818	1,639,159	23,455,828	70,071	210,292,875
Foreign branch Income	-544,649	75,707,194	47,839,809	202,886,092	* 36,217	98,090,623	53,446,244	35,008	151,608,091

Category of foreign income for which separate credit was computed	Foreign income, deductions, and taxes reported on Form 1118—continued					
			Foreign taxes paid or accrued on:			
	Foreign taxable income (less loss) before adjustments	Total foreign taxes paid or accrued	Dividends	Distributions of previously taxed income	Interest	Rents, royalties, and license fees
	(19)	(20)	(21)	(22)	(23)	(24)
All income types	767,587,994	36,185,068	1,370,514	989,754	904,752	6,897,665
Passive income	24,207,666	669,398	73,185	d	169,557	48,652
General limitation income	524,809,405	14,654,638	1,109,947	981,700	567,323	6,720,509
Section 901(j) income [5]	8,757	0	0	0	d	0
Income resourced by treaty	2,415,701	251,815	d	0	d	* 53,405
Section 951A income [6]	164,868,464	170,222	168,165	2,057	0	0
Foreign branch Income	d	d	156,455	75,098	1,951,114	7,674,362

Footnotes at end of table.

Table 3. U.S. Corporation Returns with a Foreign Tax Credit, 2018: Foreign Income, Deductions, and Taxes Reported on Form 1118 by Type of Foreign Income for Which Separate Credit Was Computed—Continued

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

Category of foreign income for which separate credit was computed	Foreign income, deductions, and taxes reported on Form 1118—continued					
	Foreign taxes paid or accrued on—continued:				Foreign taxes deemed paid	Foreign tax credit [7]
	Other income (withheld at source)	Sales income	Services income	Other income		
	(25)	(26)	(27)	(28)	(29)	(30)
All income types	3,297,452	8,669,938	2,061,185	11,993,808	127,911,859	103,447,079
Passive income	8,963	d	d	364,797	2,399,605	1,679,714
General limitation income	1,318,094	974,677	678,169	2,304,219	87,660,630	67,385,220
Section 901(j) income [5]	d	d	d	0	d	d
Income resourced by treaty	d	* 19,825	* 65,467	* 70,299	313,737	d
Section 951A income [6]	0	0	0	0	37,511,035	24,189,176
Foreign branch Income	1,317,543	7,674,362	1,317,543	9,254,493	d	9,856,871

* Data should be used with caution because of the small number of sample returns on which they are based.
d—Not shown to avoid disclosure of information about specific taxpayers. However, the data are included in the appropriate totals.
[1] Total number of returns does not equal the sum of returns for specific type of foreign income because a return could include multiple categories of foreign income.
[2] Includes Subpart F and Global Intangible Low-Taxed Income (GILTI) inclusions. U.S. shareholders of controlled foreign corporations (CFCs) are required to include certain income from the CFC in their gross income under these provisions.
[3] Included in gross income (less loss), columns 2-11.
[4] Section 250 deductions include deductions on foreign-derived intangible income and global intangible low-taxed income.
[5] Income from sanctioned countries. The sanctioned countries for 2018 are Iran, North Korea, Sudan, and Syria.
[6] Section 951A income is global intangible low-taxed income, excluding passive income.
[7] Foreign tax credit amount shown in this table represents the foreign tax credit before reduction in credit for international boycott operations. The reduction for participation in international boycott operations is not reported by separate income categories. The foreign tax credit after boycott reduction is reported in Table 1, Column 7.
NOTE: Detail may not add to totals because of rounding.
SOURCE: IRS, Statistics of Income Division, Corporate Foreign Tax Credit Study, December 2021.

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