CBO PAPER

PERSPECTIVES ON THE OWNERSHIP OF CAPITAL ASSETS AND THE REALIZATION OF CAPITAL GAINS

May 1997

CONGRESSIONAL BUDGET OFFICE SECOND AND D STREETS, S.W. WASHINGTON, D.C. 20515

NOTE

Numbers in the text and tables of this paper may not add to totals because of rounding.

The Congressional Budget Office (CBO) has examined data from a number of sources on the ownership of capital gains assets and the realization of capital gains. An important feature of CBO's inquiry is the use of data from a panel of tax returns over a 10-year period (1979 to 1988). Together, these data provide a comprehensive picture of who owns capital gains assets, who realizes gains, and who pays capital gains taxes. The paper was prepared for the Senate Committee on the Budget at the request of Senator Frank R. Lautenberg, the Ranking Minority Member. In keeping with the mandate of the Congressional Budget Office, the paper contains no recommendations.

Leonard Burman and Peter Ricoy, formerly of CBO's Tax Analysis Division, prepared the paper under the direction of Rosemary Marcuss and Frank Sammartino. Jeff Groen, Richard Kasten, and David Weiner compiled tables for the report and gave valuable advice on interpreting the data. Stephanie Weiner provided research assistance. Many people furnished helpful comments and advice, including Jerry Auten, Robert Dennis, Alfred Drummond, Fred Goldberg, Jane Gravelle, Arlene Holen, R. Glenn Hubbard, Larry Ozanne, Benjamin Page, James Poterba, and George Zodrow.

Sherwood Kohn edited the paper, Marlies Dunson provided editorial assistance, and Simone Thomas prepared the manuscript for publication.

June E. O'Neill Director

May 1997

CONTENTS

SUMMARY AND INTRODUCTION	1
WHO OWNS CAPITAL GAINS ASSETS?	3
WHO REALIZES CAPITAL GAINS?	10
Factors Affecting Capital Gains Realizations	10
Evidence from a Panel	11
Differences by Age	15
Comparing Annual Data with the Panel	17
Evidence from Recent Annual Tax Return Data	20
Dollar Value and Frequency of Transactions	24
THE EFFECTS OF INFLATION	28
THE DISTRIBUTION OF THE TAX ON CAPITAL GAINS	31
APPENDIX: DATA, METHODOLOGY, AND ADDITIONAL TABLES	35

TABLES

1.	Ownership of Capital Gains Assets, by Income and Age of Family Head, 1992	7
2.	Share of Capital Gains Assets Held, by Income and Age of Family Head, 1992	9
3.	Capital Gains in Family Income: 10-Year Panel Data, 1979-1988	12
4.	Capital Gains in Family Income: Seven-Year Panel Data, 1979-1985	13
5.	Share of Gains, by Income: Panel Data	16
6.	Share of Capital Gains, by Income	21
7.	Capital Gains, by Income, 1993	23
8.	Capital Gains, by Income and Age, 1993	25
9.	Capital Gains, by Size of Gain, 1993	26
10.	Capital Gains, by Number of Gains Transactions, 1993	27
11.	Nominal and Real Capital Gains from All Capital Assets Except Bonds, by Income, 1993	29
12.	Nominal and Real Capital Gains from Corporate Stock, by Income, 1993	30
13.	Taxes Paid on Capital Gains, by Income, 1993	32
14.	Taxes Paid on Capital Gains as Percentages of Taxable Gains and Total Taxes, by Income and Age, 1993	33

A-1.	Number of Tax Returns, Total and Samples	42
A-2.	Differences in Capital Gains Data Between 1993 Statistics of Income a SOCA Panel in 1993	and 43
A-3.	Share of Transactions by Asset Type for Full SOCA Sample and Sample w Exclusions for Extreme Observations, 1993	vith 44
A-4.	Share of Net Gains by Asset Type for Full SOCA Sample and Sample w Exclusions for Extreme Observations, 1993	vith 45
A-5.	Differences in Capital Gains Data Between 1985 SOI and SOCA Pane 1985	1 in 46
A-6.	Differences in Capital Gains Data Between 1989 SOI and SOCA Pane 1989	1 in 47
A-7.	Composition of Capital Gains and Losses, by Asset Type, 1985	48
A-8.	Composition of Capital Gains and Losses, by Asset Type, 1989	49
A-9	Composition of Capital Gains and Losses, by Asset Type, 1993	50
A-10.	Asset Sale Price, Basis, and Gains by Asset Type, 1985	51
A-11.	Asset Sale Price, Basis, and Gains by Asset Type, 1989	52
A-12.	Asset Sale Price, Basis, and Gains by Asset Type, 1993	53
A-13.	Average Asset Holding Period by Asset Type, 1985	54
A-14.	Average Asset Holding Period by Asset Type, 1989	55
A-15.	Average Asset Holding Period by Asset Type, 1993	56
A-16.	Tax Returns and Capital Gains by Number of Gains Transactions, 1985	57
A-17.	Tax Returns and Capital Gains by Number of Gains Transactions, 1989	58
A-18.	Nominal and Real Capital Gains for All Capital Assets Except Bonds,	59

A-19.	Nominal and Real Capital Gains for All Capital Assets Except Bonds, by Income, 1989	60
A-20.	Nominal and Real Capital Gains for Corporate Stock Only, by Income, 1985	61
A-21.	Nominal and Real Capital Gains for Corporate Stock Only, by Income, 1989	62
A-22.	Share of Capital Gains and Losses, by Month, 1985	63
A-23.	Share of Capital Gains and Losses, by Month, 1989	64
A-24.	Share of Capital Gains and Losses, by Month, 1993	65
A-25.	Capital Gains for All Taxpayers, by Income and Filing Status, 1993	66
A-26.	Capital Gains for Taxpayers Under 65 Years Old, by Income and Filing Status, 1993	67
A-27.	Capital Gains for Taxpayers 65 Years Old and Over, by Income and Filing Status, 1993	68
A-28.	Capital Gains for Joint Returns, by Income, 1985, 1989, and 1993	69

FIGURES

1.	Composition of Assets in Families' Portfolios, 1992	4
2.	Composition of Capital Gains Assets, Including Homes, in Families' Portfolios, 1992	6
3.	Composition of Income for Taxpayers Under Age 65	18
4.	Composition of Income for Taxpayers Age 65 Years or Over	19
5.	Share of Realized Capital Gains, by Income	22

Taxing people in similar economic circumstances in the same way is a fundamental objective of tax policy. The way capital gains are taxed has always presented vexing problems that make it difficult to achieve that objective.

A capital gain (or loss) takes place when an asset increases (or decreases) in value. That change in value is income. Under an income-based tax system, the annual income accrued in the form of capital gain should in principle be taxed in the same fashion as other forms of income, such as interest on ordinary savings accounts. (Under a consumption-based tax system, neither a capital gain nor the interest from saving would be taxed.) In practice, although capital gains are taxed, they are not taxed as they accrue, but only when they are "realized" into cash through sale of an asset.

Accrued gains are not the same as realized gains, and that difference can have important implications for taxpayers and the tax system. For example, people who sell their family business or home may realize a capital gain that far exceeds the income they earned in that year from that asset. In other years, the same people may have earned capital gains that were not reflected in income because they were unrealized. Moreover, investors who have large portfolios of assets and engage in aggressive tax planning might appear to have little or no capital gains, despite substantial appreciation in the value of their portfolios.

Inflation further complicates such comparisons because taxes are paid on the nominal gain from the sale of an asset without any adjustment for inflation, regardless of the number of years that have elapsed since its purchase. Thus, two people with the same nominal gain—but accrued over different time periods—could have very different real gains after adjusting for inflation. Inflation raises the effective tax rate on capital gains (and also on income from interest) compared with other forms of income, such as wages.

Because it is difficult as a practical matter to tax capital gains in the same way as other forms of income, people who own assets that produce capital gains can be taxed differently than other taxpayers. In an effort to determine who is affected by such anomalies and who could be affected by changes in the tax treatment of capital gains, the Congressional Budget Office (CBO) has examined data from four sources on the ownership of capital gains assets and the realization of capital gains. An important feature of CBO's inquiry is the use of data from a panel of returns for taxpayers over a 10-year period (1979 to 1988). Those data convey a more complete picture than is available in annual data about the patterns of capital gains realizations. Data from the 1992 Survey of Consumer Finances (SCF) provide information on the holding of assets. Data from the 1985-based Sales of Capital Assets (SOCA) study

and from the 1993 Statistics of Income (SOI) sample of income tax returns provide additional, and more recent, information.

The chief findings concerning the ownership of capital assets and the realizations of capital gains are as follows:

- o About one-half of U.S. families own assets such as stocks, bonds, real estate, and businesses that might produce capital gains or losses. That proportion rises to three-fourths if people's homes are included.
- o Assets that typically generate capital gains account for only about 38 percent of families' total wealth; homes account for another 28 percent; pensions account for most of the remainder.
- Over a 10-year period, about one-third of taxpayers report at least one transaction with a capital gain or loss.
- o Just over one-half of the total wealth held in the form of capital gains assets other than homes and more than 75 percent of capital gains realized in any one year accrue to families with annual incomes of \$100,000 or more (approximately, the top 5 percent of families).
- o It is not true, however, that most people who have taxable capital gains have high incomes. Nearly two-thirds of tax returns reporting capital gains are filed by people whose incomes are under \$50,000 a year. But the amounts of their capital gains are small compared with those of the average high-income taxpayer.
- Income and gains reported for a single year exaggerate the share of gains received by people in the extremes of the income distribution. Longitudinal data for 1979-1985 show that when families' income and gains are averaged over a seven-year period, families with incomes of \$100,000 or more account for about 70 percent of all realized gains. But in a single year within that period, such families accounted for a variable share of realized gains ranging from 75 percent to 87 percent. The difference arises because annual income frequently deviates from long-term, or lifetime, income, and realized capital gains are a significant source of such deviations.
- o Because taxes are paid on nominal capital gains, the tax on real (inflation-adjusted) capital gains can greatly exceed the statutory rate. Calculations based on a simple adjustment for inflation show that the sale of capital assets generating net taxable gains of \$81.4 billion in 1993 produced only \$39.5 billion in real gains once that adjustment was made (assuming the current-law

loss limit). Because inflation-adjusted gains amounted to about one-half of nominal gains, the tax rate on inflation-adjusted gains was in effect about double the rate applied to nominal gains.

Older people account for a disproportionately larger share of realized capital gains and the taxes paid on gains. People 65 years old and older made up 12 percent of all taxpayers in 1993, but they realized 30 percent of total net capital gains and paid 30 percent of the tax on capital gains. Taxes on capital gains accounted for 7 percent of the income taxes paid overall, but 18 percent of the taxes paid by those 65 years old and older and 5 percent of the taxes of those under 65.

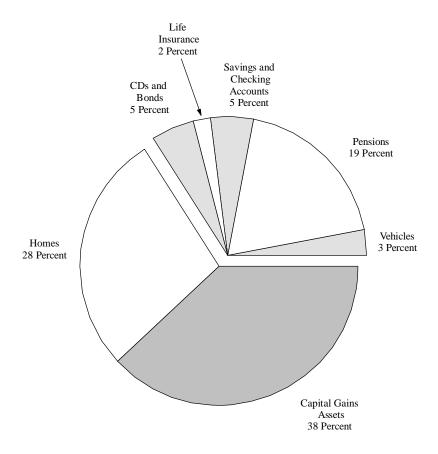
WHO OWNS CAPITAL GAINS ASSETS?

Annual data from individual income tax returns paint an incomplete picture of the distribution of tax liabilities on capital gains. People do not pay tax on capital gains until they sell assets, even though those assets are constantly gaining or losing value. As a result, people who choose not to sell their assets in a specific year appear, on the basis of tax return data, to be unaffected by the tax on capital gains. Similarly, people who sell all or most of their holdings in any single year appear to be excessively affected by the tax on capital gains. People who defer realizations of capital gains thus seem to have less income than they really do, whereas people who realize gains on assets that they have held for a long time have artificially inflated incomes in that year. Data on realizations also significantly understate the ownership of capital gains assets, because many capital gains assets are held until death or donated to charity and thus never reported on tax forms.

Assets such as stocks, bonds, mutual funds, investment real estate, and businesses—the kinds of assets that generate taxable capital gains—accounted for about 38 percent of families' wealth in 1992 (see Figure 1). Homes, which are most people's single largest asset, represented about 28 percent of their wealth. Because current tax rules allow homeowners to defer taxes on capital gains from home sales if they purchase a home of equal or greater value when they sell their home, and permit homeowners 55 years old and older a one-time exclusion for up to \$125,000 in gains from the sale of a home, most capital gains from homes are not taxed.

The data are from the Survey of Consumer Finances compiled by the Federal Reserve Board. The SCF
defines families as including married couples with or without children and single individuals. The survey
does not include financially independent individuals living with the family.

FIGURE 1. COMPOSITION OF ASSETS IN FAMILIES' PORTFOLIOS, 1992



SOURCE: Congressional Budget Office tabulations of 1992 Survey of Consumer Finances and Flow of Funds Accounts, Z.1 Statistical Release (September 1994).

NOTE: Pension data are from the Flow of Funds Accounts. Pensions include defined contribution plans, such as individual retirement accounts, 401(k)s, and defined benefit plans.

Savings, checking, and money market accounts, the most commonly held types of asset, constitute a relatively small portion of families' wealth: only 5 percent of asset holdings. Those assets do not produce capital gains.

Pensions, including tax-deferred savings plans such as individual retirement accounts (IRAs), 401(k)s, and traditional employer-sponsored pension plans represented 19 percent of wealth in 1992. Those accounts may hold capital gains assets, such as shares of corporate stock, but the gains are not taxed.

The most significant investment assets that produce taxable capital gains were the buildings and equipment that make up businesses—nearly a quarter of all capital gains assets (see Figure 2). Land and rental real estate constituted nearly one-fifth. Shares of stock in publicly traded corporations accounted for only about 6 percent of capital gains assets, and mutual funds made up only about 3 percent. If homes are included among capital gains assets, they are by far the largest component, equal to 43 percent of the total in 1992.

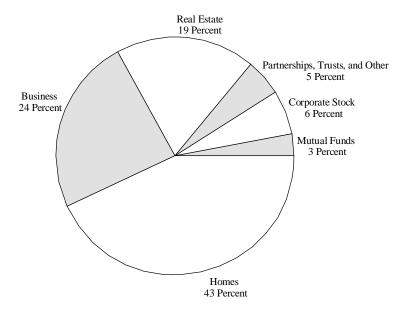
In 1992, about three-quarters of U.S. families owned stocks, bonds, business property, investment real estate, or homes (see Table 1). Any of those assets can produce capital gains or losses, although as noted previously, special rules exempt from tax almost all gains on owner-occupied housing. Excluding homes, nearly one-half of all families own at least one capital gains asset. Thus, taxes on capital gains potentially affect a significant portion of the population.

Families with higher incomes are more likely than those with lower incomes to hold capital gains assets. In 1992, about 30 percent of families whose incomes were under \$20,000 owned capital gains assets (not including homes). The percentage increased to 50 percent for families who had incomes between \$20,000 and \$50,000, and to 70 percent for families with incomes between \$50,000 and \$100,000. More than 90 percent of families who had incomes of more than \$100,000 held such assets, whereas virtually all families who had incomes of more than \$200,000 held at least some capital gains assets.

The kinds of assets owned vary with income. Families with incomes over \$200,000 were twice as likely to hold corporate stock as families with incomes between \$50,000 and \$100,000, but were two and one-half times as likely to hold real estate (other than homes) and nearly three times as likely to hold business property as those families. High-income families were nearly eight times as likely as middle-income families to hold tax-exempt bonds, but only about one-quarter of high-income families owned those assets.

Ownership of capital gains assets varies with age, because people tend to accumulate assets over their working lives and then begin consuming them during

FIGURE 2. COMPOSITION OF CAPITAL GAINS ASSETS, INCLUDING HOMES, IN FAMILIES' PORTFOLIOS, 1992



SOURCE: Congressional Budget Office tabulations of 1992 Survey of Consumer Finances.

TABLE 1. OWNERSHIP OF CAPITAL GAINS ASSETS, BY INCOME AND AGE OF FAMILY HEAD, 1992 (In percent)

		Percentage Owning Assets Other Than a Home							Percentage	
	Percentage	_		Tax-	•		Investment	Any Non-	Owning	
Family	Owning		Taxable	Exempt	Mutual	Business	Real	Housing	Any Assets,	
Characteristics	a Home	Stocks	Bonds	Bonds	Funds	Property	Estate	Asset	Including Homes	
All Families	63.9	16.9	3.0	2.2	10.4	14.2	19.4	48.6	76.6	
Family Income										
Less than 20,000	47.4	6.3	1.4	0.1	4.2	6.3	9.1	29.5	60.2	
20,000 to 50,000	66.8	15.7	2.6	1.5	10.2	12.7	19.4	50.4	81.4	
50,000 to 100,000	84.7	31.7	4.8	3.5	17.4	23.1	29.6	71.2	94.2	
100,000 to 200,000	91.9	46.9	10.4	14.8	26.8	46.0	52.6	92.9	99.0	
200,000 and over	86.5	60.7	16.6	26.6	45.7	66.3	72.6	100.0	100.0	
Age of Family Head										
Less than 35	36.9	10.6	1.1	0.4	5.1	10.6	8.2	39.9	59.3	
35 to 44	64.5	19.5	1.7	1.2	10.1	19.1	16.7	52.0	77.8	
45 to 54	75.4	18.4	3.3	3.3	9.4	18.4	25.1	51.8	83.0	
55 to 64	77.6	21.5	3.0	2.9	15.8	18.2	35.1	59.5	86.8	
65 and over	78.4	17.7	6.4	4.0	14.2	7.8	21.4	46.5	84.8	

 $SOURCE:\ Congressional\ Budget\ Office\ tabulations\ of\ the\ 1992\ Survey\ of\ Consumer\ Finances.$

retirement, or bequeath them to their heirs. That "life-cycle" pattern is reflected in statistics on asset ownership. About 40 percent of families headed by someone younger than 35 held capital gains assets, compared with more than 50 percent of families headed by someone between 35 and 64. The percentage falls slightly, to 47 percent, for families whose head is over 64 years old.

Not surprisingly, the value of assets owned is highly correlated with income. Thus, in 1992 the 39 percent of families with incomes of \$20,000 to \$50,000 owned 17 percent of capital assets excluding homes, whereas the 18 percent of families with incomes of \$50,000 to \$100,000 owned 23 percent of such assets, and the 5 percent of families with incomes of \$100,000 and over owned 54 percent of them (see Table 2). The value of mutual funds was more evenly distributed by income than other, nonresidential capital assets, and tax-exempt bonds were the most highly skewed toward upper-income families. The value of principal residences was the most evenly distributed of all capital assets.

The value of assets owned is also correlated with age. The 22 percent of families headed by someone 65 years old or older owned 29 percent of the value of capital gains assets other than housing. That included 42 percent of stocks, 41 percent of mutual funds, and 44 percent of bonds. The 13 percent of families headed by someone 55 to 64 years old also held a disproportionate share of assets: a total of about one-quarter of nonresidential capital gains assets. Conversely, the 26 percent of families headed by someone under age 35 held less than 6 percent of nonresidential capital gains assets and about 8 percent of total assets including homes.

Patterns of asset ownership suggest that tax considerations influence the type of assets that people own. People with higher incomes, who also face the highest tax rates, are more likely to choose capital gains assets and other tax-preferred investments such as tax-exempt bonds, which are relatively lightly taxed compared with other income-producing assets. Middle-income families, facing lower tax rates, are much more willing to hold fully taxed assets such as dividend-paying stock and taxable bonds.

Of course, factors other than taxes contribute to those differences. For example, older people prefer to hold more liquid assets, which are more likely than capital gains to pay out income in the form of interest and dividends. Lower-income people are probably less willing to bear the risk associated with many investments that pay returns in the form of capital gains. And they might have a stronger preference for current (rather than deferred) income than people with higher incomes.

TABLE 2. SHARE OF CAPITAL GAINS ASSETS HELD, BY INCOME AND AGE OF FAMILY HEAD, 1992 (In percent)

	Capital Gains Assets Other Than Homes									
Family Characteristics	Percentage of Families	Principal Residence	Stocks	Taxable Bonds	Tax- Exempt Bonds	Mutual Funds	Business Property	Investment Real Estate	All Non- Housing Assets	All Capital Gains Assets Including Homes
Family Income										
Less than 20,000	38.3	15.8	3.8	4.0	0.3	6.8	4.8	6.4	5.7	9.7
20,000 to 50,000	39.0	32.2	12.0	14.1	12.9	24.6	15.5	20.1	17.2	23.3
50,000 to 100,000	18.3	30.2	24.7	22.2	17.3	28.7	20.8	23.3	23.1	25.9
100,000 to 200,000	4.3	14.7	23.9	19.3	27.8	18.9	21.1	21.6	21.4	18.8
200,000 and over	1.2	<u>7.0</u>	<u>35.6</u>	40.4	41.7	21.0	<u>37.7</u>	28.5	32.6	22.4
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Age of Family Head										
Less than 35	25.8	12.5	3.4	2.0	1.0	2.1	6.8	5.3	5.6	8.3
35 to 44	22.8	24.4	9.4	14.7	7.3	12.1	22.4	12.6	16.4	19.5
45 to 54	16.2	22.0	22.6	20.4	25.5	12.8	24.6	27.7	24.6	23.5
55 to 64	13.2	17.3	22.5	19.5	22.4	32.1	25.0	24.7	24.7	21.6
65 and over	22.0	23.7	42.2	43.5	43.9	40.9	21.3	<u>29.7</u>	28.6	<u>27.1</u>
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

SOURCE: Congressional Budget Office tabulations of the 1992 Survey of Consumer Finances.

In analyzing the pattern of capital gains realizations, a measurement issue must be addressed at the outset. It is usual to use data from the Internal Revenue Service's annual compilation of tax returns. The advantage of those data sets, constructed by the SOI division, is that they are timely and large. The disadvantage is that annual "snapshots" can be misleading.² For example, a taxpayer of modest income who sells a business may appear to have a very high income in that year. A higher-income taxpayer who uses tax-minimizing strategies to avoid realizing taxable gains in years when his or her income is high will often appear to have low capital gains (as well as understated income). Those two possibilities tend to tilt the distribution in different directions: the first would allocate too many capital gains to higher-income taxpayers, the second too few. Clearly, additional information is needed to assess the net effect of such factors in the annual snapshots.

The Congressional Budget Office has examined those influences by looking at the same taxpayers over a 10-year period. Economists have long recognized that lifetime or "permanent" income more accurately reflects an individual's well-being than annual income, especially when annual income is volatile. Capital gains are one of the most volatile components of annual income. Data for computing lifetime income do not exist, but average income and gains over 10 years can be calculated using a panel created by the Treasury's Office of Tax Analysis, based on Internal Revenue Service data that include information from tax returns for about 20,000 taxpayers filed from 1979 to 1988.

Factors Affecting Capital Gains Realizations

Ownership of assets that produce capital gains does not necessarily translate into realizations of capital gains. Taxpayers can usually exercise considerable discretion over when to sell an asset and realize a gain. Because taxes on capital gains are only levied when a gain is realized, all investors have an incentive to postpone realizing gains. Deferral reduces the effective tax rate on capital gains assets because money that would have gone to pay taxes each year can continue to earn returns until the asset is sold and the tax is paid. For example, the effective tax rate on an asset that

_

^{2.} The terminology follows that used by Joel Slemrod, "Taxation and Inequality: A Time-Exposure Perspective," in James M. Poterba, ed., *Tax Policy and the Economy*, vol. 6 (Cambridge and London: MIT Press, 1992). See also Michael Haliassos and Andrew B. Lyon, "Progressivity of Capital Gains Taxation with Optimal Portfolio Selection," in Joel Slemrod, ed., *Tax Progressivity and Income Inequality* (Cambridge, New York, and Melbourne: Cambridge University Press, 1994); and Department of the Treasury, *Report to the Congress on the Capital Gains Tax Reductions of 1978* (September 1985).

appreciates in value at 7 percent per year would be about one-half the statutory rate of 28 percent if the asset was held for 30 years. If gains are never realized during the owner's lifetime, the tax is avoided altogether because those gains are not subject to income taxes when they are passed on to an heir.

Of course, postponing a gain also has a cost because the income from realizing the gain is deferred and is therefore currently unavailable for consumption or for alternative investments. Taxpayers can avoid the tax on capital gains without deferring realizations by such strategies as donating appreciated assets to charity or selling assets with capital losses to shelter the capital gain on other assets from tax. More complex strategies such as equity swaps and short sales can be used to avoid realizing a capital gain, but they are more costly to carry out.³

In general, taxpayers have more of an incentive to postpone or avoid realizing capital gains if they face higher tax rates on realizations, have larger accrued gains, or are more likely to leave an inheritance. Another consideration is the ability of asset holders to defer income from gains. Those who have relatively little income from other sources are likely to find it harder to postpone realizations. Thus, the pattern of realizations of capital gains may be different from that of asset ownership, although it is difficult to predict how the combination of these various factors would affect the pattern of realizations among asset holders by income and age.

Evidence from a Panel

December 1, 1996, p. A1.

The evidence from the panel on capital gains realizations is nonetheless broadly consistent with evidence from data about asset ownership and the likelihood of realizing a capital gain. About 49 percent of U.S. families owned capital gains assets (excluding housing) in 1992, according to the SCF. Nearly one-third of taxpayers reported a capital gain at least once during the 10 years spanned by the panel, whereas one-quarter did so during the seven years from 1979 through 1985 (see Tables 3 and 4). If taxpayers own capital assets in the same proportion as families in the SCF, about two-thirds of the taxpayers owning capital gains assets (32 percent divided by 49 percent) choose to sell at least some of them during a 10-year period. However, taxpayers are more likely to own capital gains assets than the rest of the population, because people who do not file tax returns (those excluded from the tax data but included in the SCF) have low incomes. Thus, the data suggest that

^{3.} For examples of such strategies, see George M. Constantinides, "Optimal Stock Trading with Personal Taxes: Implications for Prices and the Abnormal January Returns," *Journal of Financial Economics*, vol. 13, no.1 (March 1984), pp. 65-89; Joseph E. Stiglitz, "Some Aspects of the Taxation of Capital Gains," *Journal of Public Economics*, vol. 21, no. 2 (June 1983), pp. 257-294; and Diana B. Henriques and Floyd Norris, "Wealthy, Helped by Wall St., Find New Ways to Escape Tax on Profits," *New York Times*,

TABLE 3. CAPITAL GAINS IN FAMILY INCOME: 10-YEAR PANEL DATA, 1979-1988

	For A	ll Returns	For Returns With Gains				
Average Income (In 1993 dollars)	Gain as Percentage of Income	Percentage of Returns with Gain or Loss	Average Gain (Dollars)	Gains as Percentage of Income	Average Number of Years with Gains		
Less Than 0	n.a.	72	-27,874	n.a.	5		
0 to 10,000	a	10	128	2	3		
10,000 to 20,000	1	19	1,052	7	3		
20,000 to 30,000	1	27	1,201	5	3		
30,000 to 40,000	2	36	1,881	5	3		
40,000 to 50,000	2	42	1,671	4	3		
50,000 to 75,000	3	56	2,786	5	4		
75,000 to 100,000	6	78	6,256	7	5		
100,000 to 200,000	11	89	15,505	12	6		
200,000 and Over	38	99	179,041	38	7		
Total	6	32	6,250	12	4		

NOTES: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

n.a. = not applicable.

a. Less than 0.5.

TABLE 4. CAPITAL GAINS IN FAMILY INCOME: SEVEN-YEAR PANEL DATA, 1979-1985

	For A	ll Returns	For Returns With Gains				
Average Income (In 1993 dollars)	Gain as Percentage of Income	Percentage of Returns with Gain or Loss	Average Gain (Dollars)	Gains as Percentage of Income	Average Number of Years with Gains		
Less Than 0	n.a.	65	-10,774	n.a.	4		
0 to 10,000	a	9	171	3	2		
10,000 to 20,000	1	15	863	6	2		
20,000 to 30,000	2	23	1,594	6	2		
30,000 to 40,000	2	28	2,012	6	2		
40,000 to 50,000	2	34	2,004	4	3		
50,000 to 75,000	3	47	3,165	5	3		
75,000 to 100,000	4	69	4,607	5	4		
100,000 to 200,000	11	86	16,495	13	4		
200,000 and Over	35	97	152,205	35	5		
Total	5	26	6,071	11	3		

NOTES: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

n.a. = not applicable.

a. Less than 0.5.

somewhat fewer than two-thirds of taxpayers who own capital gains assets choose to sell at least some of them over a 10-year period.

Data for 1986 to 1988, the last three years of the panel, may be anomalous because of the Tax Reform Act of 1986 (TRA). Following TRA, realized capital gains were fully included in taxable income for the years after 1986. Previously, only 40 percent of realized capital gains on assets held for longer than a year was included in taxable income. Because the maximum tax rate on ordinary income was reduced by TRA from 50 percent to 28 percent, the maximum tax rate on capital gains was increased from 20 percent in 1986 to 28 percent in 1987. Realizations of capital gains were extraordinarily high in 1986 when taxpayers rushed to sell assets before the tax rate increased. Realizations may have been depressed in 1987 and 1988 because many assets that would have been sold in those years were sold in 1986 instead. For those reasons, the 1979-1985 period probably provides a more stable view of realizations and their relationship to longer-term income. Data for both the seven-year and the 10-year panel are presented below.

Characteristics associated with the realization of capital gains or losses are similar to those related to owning capital gains assets. Thus, the probability of realizing a gain or loss increases steadily with income. For example, roughly 30 percent of taxpayers in the seven-year panel and 40 percent of taxpayers in the 10-year panel who had incomes of \$30,000 to \$50,000 realized a capital gain. Eighty-six percent to 89 percent of taxpayers with incomes of \$100,000 to \$200,000 and 97 percent to 99 percent of taxpayers who had incomes over \$200,000 reported a gain. That corresponds reasonably well with the survey data about family wealth, showing that about 50 percent of families who had incomes between \$20,000 and \$50,000 owned capital gains assets, whereas 93 percent of families with incomes between \$100,000 and \$200,000 and 100 percent of families with incomes over \$200,000 owned such assets.⁵

On average, taxpayers who realized a gain reported them in four out of the 10 years in the panel. The frequency of gains realizations rises with income. Thus, taxpayers who had incomes between zero and \$50,000, and who realized at least one gain or loss, reported a gain or loss in an average of three years out of 10. That frequency rose to seven years out of 10 for those in the highest income bracket.

^{4.} Actually, TRA phased in the reduction in tax rates on ordinary income over two years but stipulated that a maximum tax rate of 28 percent on long-term capital gains would apply immediately. When the Congress later increased tax rates on ordinary income, it left the 28 percent maximum tax rate on capital gains in place.

^{5.} The tax data pertain to tax units—that is, individuals and families who file tax returns—whereas the data about wealth are based on families. Some families have multiple tax units, for example, because children have enough income to be required to file separate returns.

The proportion of realized gains in total income also rises as income increases. The average gain reported by taxpayers with gains and incomes below \$100,000 was 7 percent or less of their total income compared with 12 percent for taxpayers with incomes between \$100,000 and \$200,000 and 38 percent for taxpayers whose incomes were greater than \$200,000.

About 0.3 percent of all taxpayers had negative total income over the 10 years. They are clearly different from the other low-income people in the sample. Nearly three-quarters of those with negative income had a gain or loss over the 10-year period, and their average realization amounted to a loss of nearly \$28,000. Those who realized a gain or loss did so, on average, in five years out of 10. The frequency of gains makes these people resemble taxpayers who had incomes of between \$75,000 and \$100,000 rather than low-income taxpayers. The category probably consists of taxpayers who had tax-shelter losses and those who had bad luck on investments or in a small business. (Taxpayers whose only sources of income are wages, interest, and dividends cannot have negative income.)

The data on the value of realizations, however, are not fully consistent with the data on the value of asset holdings. Families in the highest 1 percent of the income distribution owned about one-third of total capital gains assets excluding primary residences, but more than one-half of capital gains were realized by the 1 percent of taxpayers who were in the highest income class (see Table 5).

Although taxpayers in the highest income groups account for the bulk of capital gains realizations, most taxpayers with realizations are not in the highest income group. Over the seven years of the panel from 1979 through 1985, the 3 percent of taxpayers whose incomes (in 1993 dollars) averaged \$100,000 or more realized 70 percent of the dollar value of capital gains. (If the panel is expanded to include the volatile years of 1986 through 1988, they realized nearly three-quarters.) But it is also true that over either the seven years or the 10 years of the panel, more than 60 percent of taxpayers with gains had incomes under \$50,000, and more than 80 percent had incomes under \$75,000.

Differences by Age

Income from capital, including capital gains, is a much more significant portion of the total income of taxpayers age 65 and older than it is for those of working age. Among taxpayers under age 65 in 1981 (the base year of the panel), wages

TABLE 5. SHARE OF GAINS, BY INCOME: PANEL DATA (In percent)

Average Income	10-Year Panel Data: 1979-1988 Returns			Seven-Year Panel Data: 1979-198 Returns			
(In 1993 dollars)	Returns	With Gains	Gains	Returns	With Gains	Gains	
Less Than 0	a	1	-3	a	1	-2	
0 to 10,000	15	5	a	19	6	a	
10,000 to 20,000	26	15	3	25	14	2	
20,000 to 30,000	18	15	3	17	15	4	
30,000 to 40,000	13	14	4	13	13	4	
40,000 to 50,000	10	13	3	9	12	4	
50,000 to 75,000	12	20	9	11	21	11	
75,000 to 100,000	4	9	9	3	9	7	
100,000 to 200,000	2	6	16	2	7	18	
200,000 and Over	_1	2	<u>57</u>	<u>1</u>	<u>2</u>	<u>52</u>	
Total	100	100	100	100	100	100	

NOTE: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

a. Less than 0.5.

constituted 83 percent of nontransfer income over the 10-year period (see Figure 3).⁶ Capital gains averaged only 5 percent, a slightly smaller share than interest and dividends and other forms of income—such as rents, royalties, and business income—which each made up about 6 percent of total income.

By contrast, wages made up a comparatively small portion of the nontransfer income of taxpayers who were 65 years old and older in 1981, the vast majority of whom were retired (see Figure 4). On average, interest and dividends accounted for 44 percent of their income; capital gains contributed 14 percent; about 19 percent came from wages and salaries; and pensions and other sources provided the remainder.

Within each age group, the share of income from capital gains rises with income. For those under 65 who had incomes of less than \$100,000, capital income in general was not a significant portion of income, and what capital income they had was generally from interest, dividends, and other sources rather than from capital gains. Capital gains accounted for a larger share of income for taxpayers 65 years old and older than for those under 65 at all income levels, but the differences were greater at incomes below \$100,000. Among taxpayers with the highest incomes, the share of capital gains was only slightly greater for those 65 years old and older than for those under age 65. The group that owns the greatest amount of assets—those 55 to 64 years old—dominate the results for the high-income group under age 65.

Comparing Annual Data with the Panel

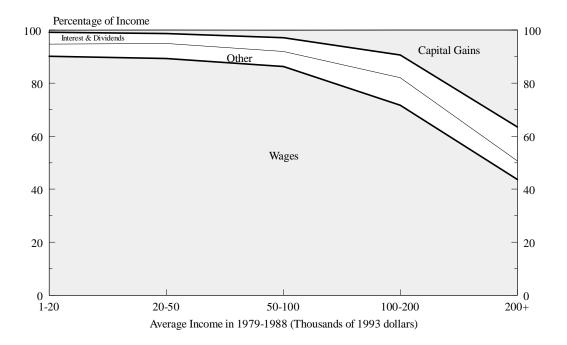
Typically, data that contain longitudinal information, such as the panel data, are not available for computing individuals' average incomes and capital gains reported over several years. Data providing annual snapshots, however, are available regularly and provide the most up-to-date record. But annual data can overstate the percentage of gains earned by the people with the highest incomes and overstate the losses incurred by those whose incomes are reported as negative.

The percentage of capital gains in the higher income categories varies considerably from year to year. For example, taxpayers who had annual incomes greater than \$200,000 (in 1993 dollars) realized between 59 percent and 91 percent of capital gains between 1979 and 1988, but taxpayers who had longer-term average

17

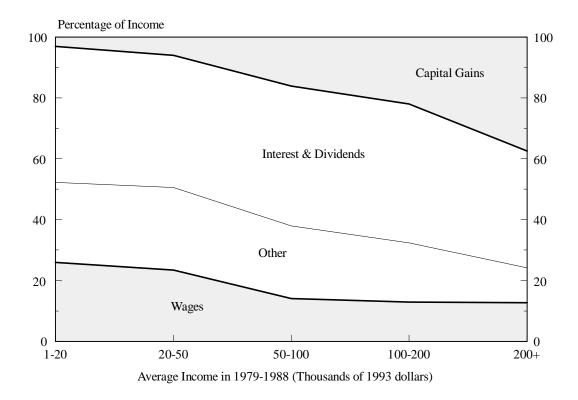
^{6.} The figures reflect only data on tax returns. Low-income individuals who do not file at all are therefore omitted from the data. In addition, the data exclude transfers from the government, such as Social Security benefits, food stamps, Aid to Families with Dependent Children, Medicare, and Medicaid. Total income of the elderly is understated in relation to the nonelderly because the former receive more income from Social Security and other transfers.

FIGURE 3. COMPOSITION OF INCOME FOR TAXPAYERS UNDER AGE 65



NOTE: Based on age in 1981. Excluding returns for which age could not be determined.

FIGURE 4. COMPOSITION OF INCOME FOR TAXPAYERS AGE 65 OR OVER



NOTE: Based on age in 1981. Excluding returns for which age could not be determined.

incomes greater than \$200,000 realized only 52 percent of average capital gains over the 1979-1985 period, and 57 percent of gains over the entire 10-year period (see Table 6).

Annual data often show larger losses than are found in the 10-year averages using the panel data. For example, in 1987, when the stock market declined sharply in October after a strong bull market earlier in the year, losses incurred by people who had negative incomes offset 20 percent of total net gains. In 1979, 1980, and 1988, losses offset from 14 percent to 18 percent of net gains, but the average losses incurred by taxpayers who had negative incomes over the entire 10 years equaled only 3 percent of gains; excluding the 1986-1988 period, such losses amounted to less than 2 percent of gains.

Nonetheless, over the entire income distribution, the relationship between income and realized capital gains shown in the annual snapshots is similar to that presented in the panel (see Figure 5). Differences arise primarily in the high end of the distribution, which is often of particular interest. In the representative single year (1984), taxpayers with the highest incomes realized a larger percentage of gains than is indicated in either the 10-year or seven-year panel data. Averaged over the 1979-1985 period, taxpayers with incomes of \$100,000 or more (the top 3 percent) accounted for about 70 percent of all realized gains (see Table 6). But in any single year, they accounted for 75 percent to 87 percent.

Evidence from Recent Annual Tax Return Data

Although the panel data from 1979 to 1988 avoid many of the problems of year-to-year volatility in capital gains realizations and other types of income characteristic of annual data, attrition and the aging of panel members limits the sample size and the accuracy with which the panel represents the entire population. Moreover, tax law and perhaps the relationship between capital gains realizations and other income have changed since the 1980s. Thus, it is both useful and necessary to look at data based on the full Statistics of Income sample of tax returns, which is larger, more recent, and more representative of the behavior of all taxpayers in a single year. In 1993, the 3 percent of taxpayers whose incomes exceeded \$100,000 realized 76 percent of capital gains (see Table 7).⁷ That is only slightly higher than the 70 percent of gains realized by taxpayers in the panel who had average incomes of more than \$100,000 (in 1993 dollars) over the 1979-1985 period. The similarity may be coincidental, however, given that the variations between annual and panel data

^{7.} The details vary somewhat, depending on whether the tax return is for a single person or a married couple, and whether or not the taxpayer is over 64. Tabulations showing those differences are reported in the appendix.

TABLE 6. SHARE OF CAPITAL GAINS, BY INCOME (In percent)

Average Income											Avei	age
(In 1993 dollars)	1979	1980	1981	1982	1983	1984	1985	1986	1987	1988	10-year	7-year
Less Than 0	-14.0	-15.8	-0.1	-0.4	-0.1	-0.7	-3.7	-5.0	-20.3	-17.7	-3.3	-1.6
0 to 10,000	-1.0	-0.4	-0.8	0.4	-0.3	0.1	a	-0.1	-1.2	-0.5	0.1	0.2
10,000 to 20,000	1.0	a	1.9	1.9	1.0	0.7	0.4	0.6	1.4	-0.5	2.6	2.0
20,000 to 30,000	1.8	1.8	2.3	2.9	2.7	2.3	1.2	0.6	2.2	1.1	2.9	3.9
30,000 to 40,000	4.1	3.7	1.2	4.1	1.9	2.7	2.6	1.2	2.0	1.5	4.4	4.4
40,000 to 50,000	3.0	3.2	3.7	3.1	1.8	1.6	2.3	1.0	3.5	0.7	3.4	4.0
50,000 to 75,000	10.6	10.3	6.7	7.5	10.7	5.6	6.0	4.0	5.6	4.4	9.0	10.7
75,000 to 100,000	8.4	10.6	8.7	5.3	7.6	6.4	6.0	5.3	7.4	5.1	8.5	6.7
100,000 to 200,000	21.9	19.8	17.6	14.6	15.5	18.4	16.5	13.1	22.0	15.1	15.7	18.0
200,000 and Over	64.2	66.8	58.8	60.6	59.2	62.9	68.5	79.3	<u>77.4</u>	90.8	56.8	51.6
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0

NOTE: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

a. Less than 0.05.

FIGURE 5. SHARE OF REALIZED CAPITAL GAINS, BY INCOME

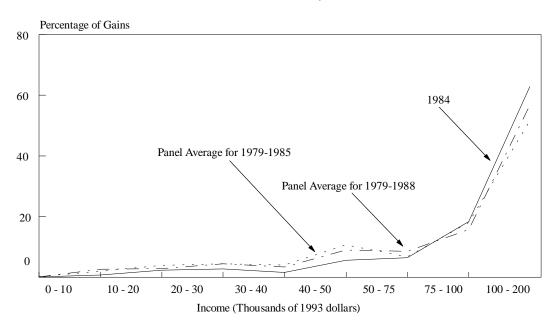


TABLE 7. CAPITAL GAINS, BY INCOME, 1993

Income	Returns (Thousands)	Percentage of Returns With Gain or Loss	Share o Returns With Gains (Percent)	f Total Gains (Percent)	For Return Average Gain (Dollars)	Gain as a Percentage of Income
L Th O	1 222	27	2	7	20.141	
Less Than 0	1,232	37	3	-7	-20,141	n.a.
0 to 10,000	32,214	8	15	1	512	10
10,000 to 20,000	24,644	10	14	3	1,769	12
20,000 to 30,000	17,746	13	13	4	2,370	10
30,000 to 40,000	12,710	15	11	4	2,856	8
40,000 to 50,000	8,717	19	9	4	3,191	7
50,000 to 75,000	10,865	27	17	9	4,149	7
75,000 to 100,000	3,318	41	8	6	6,194	7
100,000 to 200,000	2,405	58	8	14	14,482	11
200,000 and Over	752	80	3	<u>62</u>	143,943	28
Total	114,603	15	100	100	7,883	14

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data.

NOTES: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income. Gains are net gains before carryovers and loss limits.

n.a. = not applicable.

described in the previous section were larger and that the lowest share of realizations for that income group in any single year in the panel was 75 percent.

More striking, less than one-half as many people realized gains in a single year than over the 10 years of the panel. Only 15 percent of returns in 1993 reported a capital gain, compared with 32 percent in the panel. As it did in the panel, the percentage increases with income, although even in the highest income category, only four out of five taxpayers reported a gain or loss in a single year (compared with 99 percent in the panel). Also, as in the panel results, most of the taxpayers who realized gains had incomes under \$50,000.

Taxpayers 65 years old and older were more likely to realize a capital gain than other taxpayers. More than one-third of taxpayers 65 years old and older realized gains in 1993 compared with 13 percent of other taxpayers (see Table 8). The percentage who had gains was higher for the elderly than for those under age 65 in every income group, but particularly among those with incomes under \$100,000.

Taxpayers 65 years old and older accounted for 30 percent of total net gains realized in 1993, although they were only 12 percent of the population of tax filers. The average gain realized by those 65 years old and older was 6 percent higher than the average for other taxpayers overall. The average within each income group was more than twice as high for taxpayers 65 years old and older in all income groups above \$30,000, except for those with incomes of \$200,000 or more.

Dollar Value and Frequency of Transactions

Another way to look at the distribution of capital gains is in terms of the dollar value of gains realized per return. A significant portion of capital gains are realized by a relatively small number of investors who engage in many transactions and have large capital gains. In 1993, the fewer than 1,000 returns that reported total capital gains of more than \$10 million each accounted for 12 percent of all capital gains; the fewer than 13,000 returns with capital gains over \$1 million (less than 0.1 percent of returns with gains) accounted for nearly one-third of gains (see Table 9). More than one-half of capital gains were reported on the 0.5 percent of returns with capital gains over \$200,000. Although most returns with capital gains reported small gains (under \$10,000), they accounted for only 15 percent of all capital gains.

In 1993, 38 percent of returns with capital gains reported only one transaction (see Table 10). About 56 percent of returns with gains reported only one or two. But those returns had much smaller than average gains and so contributed relatively little to total gains. Returns with a single transaction accounted for less than 8 percent of gains. Returns with one or two transactions accounted for less than 15 percent of the

TABLE 8. CAPITAL GAINS, BY INCOME AND AGE, 1993

	Percentage of Returns With Gains		Net (Gains of dollars)	Net Gains of Taxpayers Age 65 and Over as a	Average Gains For Returns With Gains (Dollars)		
	Taxpayers	Taxpayers	Taxpayers	Taxpayers	Percentage	Taxpayers	Taxpayers	
Income	Under Age 65	Age 65 and Over	Under Age 65	Age 65 and Over	of Total Net Gains	Under Age 65	Age 65 and Over	
Less Than 0	33	49	-6,140	-3,145	n.a.	-20,197	-20,032	
0 to 10,000	6	23	1,073	319	23	640	305	
10,000 to 20,000	5	32	1,921	2,372	55	1,717	1,816	
20,000 to 30,000	9	40	2,674	2,629	50	1,828	3,392	
30,000 to 40,000	13	49	2,774	2,809	50	1,885	5,816	
40,000 to 50,000	16	56	2,881	2,353	45	2,258	6,464	
50,000 to 75,000	24	68	7,513	4,703	38	3,029	10,136	
75,000 to 100,000	39	77	5,731	2,687	32	4,764	17,335	
100,000 to 200,000	55	84	13,701	6,472	32	11,427	33,361	
200,000 and Over	<u>78</u>	<u>91</u>	<u>66,444</u>	<u>20,064</u>	23	128,270	244,683	
Total	13	37	98,572	41,263	30	7,755	8,212	

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data.

NOTES: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income. Gains are net gains before carryovers and loss limits.

n.a. = not applicable.

TABLE 9. CAPITAL GAINS, BY SIZE OF GAIN, 1993 (For returns with gain or loss)

		Share o	Average Gains	
Net Gain per Return	Returns (Thousands)	Returns (Percent)	Gains (Percent)	(Thousands of dollars)
Less Than 0	2,927	17	-15	-7
0 to 10,000	12,749	72	15	2
10,000 to 20,000	946	5	10	14
20,000 to 30,000	358	2	6	24
30,000 to 40,000	204	1	5	35
40,000 to 50,000	121	1	4	45
50,000 to 75,000	164	1	7	60
75,000 to 100,000	79	a	5	86
100,000 to 200,000	103	1	10	140
200,000 to 500,000	55	a	12	309
500,000 to 1,000,000	17	a	8	688
1,000,000 to 2,000,000	7	a	7	1,370
2,000,000 to 5,000,000	4	a	8	3,011
5,000,000 to 10,000,000	1	a	5	6,831
10,000,000 and Over	1	<u>a</u>	<u>12</u>	23,798
Total	17,736	100	100	8

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data.

a. Less than 0.5.

TABLE 10. CAPITAL GAINS, BY NUMBER OF GAINS TRANSACTIONS, 1993

		Share of Total		Average		
Number of Transactions	Returns (Percent)	Returns With Gains (Percent)	Gains (Percent)	Gain Per Return (Dollars)		
0	87.4	0	0	0		
1	4.7	37.6	7.3	1,794		
2	2.3	18.5	7.1	3,541		
3-5	3.2	25.3	26.5	9,655		
6-10	1.6	12.5	20.4	15,003		
11-25	0.6	4.9	21.0	39,472		
26-50	0.1	0.9	6.8	73,272		
More Than 50	<u>a</u>	0.4	10.9	250,043		
Total	100.0	100.0	100.0	9,202		

SOURCE: Congressional Budget Office tabulations of the 1993 Sales of Capital Assets panel.

a. Less than 0.05.

total. The 19 percent of returns with gains that reported more than five transactions, however, accounted for 59 percent of all capital gains.

THE EFFECTS OF INFLATION

In time, inflation tends to increase the nominal value of assets, leading to an overstatement of the real gain. Correcting for inflation over the period in which assets are held reduces the value of realized capital gains and even converts many nominal capital gains into real capital losses. Calculations based on a simple inflation adjustment show that, on average, the sale of capital gains assets realized in 1993 was substantially lower than the inflation-adjusted purchase price (see Table 11). That calculation, however, does not reflect the current-law loss limit. Taking account of that loss limit, capital assets other than bonds generated net capital gains of \$81.4 billion, on average, before adjustment for inflation but only \$39.5 billion once that adjustment was made. Thus, since inflation-adjusted capital gains amounted to about one-half of nominal gains in 1993, the effective tax rate on inflation-adjusted gains was about twice the rate currently applied to nominal gains.

Under current law, taxpayers are not permitted to deduct net capital losses in excess of \$3,000. Excess capital losses must be carried over to future years. The limit prevents taxpayers from using capital losses as a tax shelter for ordinary income and deferring tax on assets with capital gains. Such a limit would be even more important if asset sales were indexed for inflation, because many more assets would have real losses and the possibility of sheltering significant amounts of other income from tax would be substantial.

Although inflation causes real gains to be taxed at a higher rate than nominal gains, deferral tends to lower the effective rate on gains. The net effect on effective rates depends on rates of inflation, tax rates, and real appreciation of the asset over the holding period.⁹

The relationship between nominal and inflation-adjusted gains is about the same for corporate stock as for all capital gains assets (see Table 12). Taxpayers in the highest income groups tend to earn higher real returns. That may be, in part, because people who have lower incomes, especially senior citizens, are more likely to hold stocks that pay out their income in the form of dividends. Thus, as in the case

^{8.} Tables 11 and 12 are based on data from the Sales of Capital Assets file compiled by the Internal Revenue Service. The data exclude bonds and transactions for which inflation factors could not be computed. About one-third of transactions lacked enough information to produce an inflation factor. See Appendix.

^{9.} See Congressional Budget Office, *Indexing Capital Gains* (August 1990), pp. 1-12.

TABLE 11. NOMINAL AND REAL CAPITAL GAINS FROM ALL CAPITAL ASSETS EXCEPT BONDS, BY INCOME, 1993

				al Gains of dollars)	Real Gains (Millions of dollars)		
Income	Returns (Thousands)	Transactions (Thousands)	No Loss Limit	Current-Law Loss Limit	No Loss Limit	Current-Law Loss Limit	
Less Than 0	155	606	-67	1,203	-3,388	468	
0 to 10,000	1,619	3,560	-685	218	-6,009	-1,048	
10,000 to 20,000	986	2,957	1,761	2,101	-3,809	99	
20,000 to 30,000	735	1,858	2,735	3,023	-172	1,598	
30,000 to 40,000	962	2,726	1,514	1,897	-3,190	-660	
40,000 to 50,000	965	2,238	2,842	3,510	-4,496	444	
50,000 to 75,000	1,971	6,272	6,285	7,505	-4,283	2,531	
75,000 to 100,000	789	3,363	1,541	2,349	-2,887	338	
100,000 to 200,000	1,075	6,333	18,940	20,326	-160	9,503	
200,000 and Over	563	<u>7,371</u>	<u>37,020</u>	<u>39,287</u>	9,036	26,227	
Total	9,821	37,284	71,886	81,419	-19,358	39,500	

SOURCE: Congressional Budget Office tabulations of the 1993 Sales of Capital Assets panel.

TABLE 12. NOMINAL AND REAL CAPITAL GAINS FROM CORPORATE STOCK, BY INCOME, 1993

				al Gains of dollars)	Real Gains (Millions of dollars)		
Income	Returns (Thousands)	Transactions (Thousands)	No Loss Limit	Current-Law Loss Limit	No Loss Limit	Current-Law Loss Limit	
Less Than 0	80	297	-146	578	-583	281	
0 to 10,000	920	2,199	-855	-143	-4,831	-791	
10,000 to 20,000	489	1,750	813	1,126	-2,364	128	
20,000 to 30,000	318	672	197	273	-250	19	
30,000 to 40,000	498	1,417	202	458	-1,326	-207	
40,000 to 50,000	530	1,343	107	671	-612	159	
50,000 to 75,000	1,189	3,768	4,186	5,222	1,097	2,752	
75,000 to 100,000	494	2,173	90	503	-982	56	
100,000 to 200,000	833	4,556	4,590	5,135	-1,184	2,945	
200,000 and Over	_380	5,731	23,181	<u>24,775</u>	11,080	21,279	
Total	5,732	23,907	32,365	38,597	45	26,620	

SOURCE: Congressional Budget Office tabulations of the 1993 Sales of Capital Assets panel.

of business assets, it is not surprising that the elderly are more likely to realize losses after adjustment for inflation.

THE DISTRIBUTION OF THE TAX ON CAPITAL GAINS

In 1993, 17.7 million taxpayers realized \$140 billion in capital gains. After adding in losses carried over from previous years and subtracting current losses in excess of the \$3,000 limit (which are carried forward to later years), \$144 billion in capital gains were included in taxable income (see Table 13). Individuals paid \$33 billion in tax on those capital gains. For this purpose, the tax is calculated as the difference between the actual 1993 tax liability and the tax that would have been owed if no capital gains had been reported in 1993. By comparison, in 1993 total federal individual income taxes from all sources were \$503 billion. The tax on capital gains therefore amounted to less than 7 percent of the total. The tax on capital gains for those who realized gains amounted to 14 percent of their total income tax liability.

The distribution of tax liability attributable to capital gains is more concentrated at high income levels than the distribution of capital gains, because marginal tax rates increase with income. Taxpayers who have lower incomes face marginal tax rates of 0 percent or 15 percent, whereas middle- and upper-income taxpayers face the 28 percent maximum tax rate. But because about 85 percent of capital gains are realized by people in the 28 percent tax bracket, the difference is small. In 1993, taxpayers who had incomes of more than \$200,000 realized 61.9 percent of the capital gains and paid 62.4 percent of the tax (see Table 13). By contrast, taxpayers who had incomes between 0 and \$50,000 realized 15.6 percent of the gains and paid 10.5 percent of the tax.

The effective tax rate on capital gains—that is, the additional tax attributable to capital gains as a percentage of capital gains—reflects the progressivity of the income tax. Taxpayers who had an income under \$10,000 in 1993 paid an average of 11 percent of their capital gains in tax (see Table 14). The proportion increases to a maximum of about 24 percent for taxpayers in the highest income categories. It never reaches the statutory maximum rate of 28 percent, because some taxpayers have losses and deductions that lower their taxable income (before capital gains) below the threshold for the 28 percent bracket.

Nonetheless, effective tax rates vary among taxpayers at the highest income levels. Some taxpayers face a maximum effective tax rate higher than 28 percent. Taxpayers who have incomes of more than \$200,000 may face effective tax rates of 29.2 percent because of the phaseout of itemized deductions. A few taxpayers face even higher tax rates because of other provisions, such as the partial taxation of

TABLE 13. TAXES PAID ON CAPITAL GAINS, BY INCOME, 1993

	Number of	Taxable Capital Gains	Taxes Paid on Gains	Share o	of Total
Income	Returns (Millions)	(Millions of dollars)	(Millions of dollars)	Gains (Percent)	Taxes Paid (Percent)
Less Than 0	0.5	240	-62	-6.6	-0.2
0 to 10,000	2.7	1,778	154	1.0	0.5
10,000 to 20,000	2.4	4,226	558	3.1	1.7
20,000 to 30,000	2.2	5,194	786	3.8	2.4
30,000 to 40,000	2.0	5,247	941	4.0	2.8
40,000 to 50,000	1.6	5,169	1,020	3.7	3.1
50,000 to 75,000	2.9	11,664	2,557	8.7	7.7
75,000 to 100,000	1.4	7,994	1,842	6.0	5.6
100,000 to 200,000	1.4	19,187	4,645	14.4	14.0
200,000 and Over	0.6	83,438	<u>20,675</u>	61.9	62.4
Total	17.7	144,137	33,115	100.0	100.0

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data and estimates from the CBO individual income tax model.

NOTE: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income. Taxable capital gains include losses carried over from previous years, but exclude net losses in excess of the \$3,000 limit, which must be carried over to later years. Taxes paid on gains are computed by comparing tax liability with and without gains.

TABLE 14. TAXES PAID ON CAPITAL GAINS AS PERCENTAGES OF TAXABLE GAINS AND TOTAL TAXES, BY INCOME AND AGE, 1993

		on Gains as Taxable Ga	s Percentage	Taxes Paid on Gains as Percentage of All Income Taxes				
Income	All Taxpayers	Under 65	65 and Over	All Taxpayers	Under 65	65 and Over		
Less Than 0	0.7	0.7	0.7	-0.8	-0.6	-1.8		
0 to 10,000	11.0	10.8	11.7	1.8	2.0	1.3		
10,000 to 20,000	13.0	12.8	13.2	2.4	1.3	6.8		
20,000 to 30,000	14.8	14.3	15.4	1.9	1.0	7.3		
30,000 to 40,000	16.8	14.8	18.9	1.9	0.9	11.5		
40,000 to 50,000	19.5	17.7	21.7	2.2	1.2	11.6		
50,000 to 75,000	20.9	20.4	21.8	2.8	1.8	14.6		
75,000 to 100,000	21.9	21.5	22.7	3.8	2.7	17.3		
100,000 to 200,000	23.0	22.5	24.1	6.9	5.1	21.7		
200,000 and Over	23.9	23.6	24.9	17.9	15.8	31.1		
Total	23.7	23.5	24.2	6.6	5.2	17.5		

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data and estimates from the CBO individual income tax model.

NOTE: Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income. Capital gains are before carryover and loss limit. Taxes paid on gains are computed by comparing tax liability with and without gains.

Social Security benefits, which is phased in when income exceeds a threshold amount.

For example, a taxpayer whose income, excluding capital gains, is below the threshold for taxation of Social Security may find that realizing capital gains subjects some of his or her Social Security benefits to tax. (This provision does not raise effective tax rates for taxpayers whose income before capital gains is high enough so that all Social Security benefits would be subject to the partial tax.) Other taxpayers face lower tax rates because they have carried over previous years' capital losses that shelter current-year capital gains from tax, or have business losses and other deductions that put them in lower tax brackets.

People of working age generally face lower tax rates on capital gains than do older people, because they have more exemptions and deductions and are usually not subject to the tax on Social Security benefits. Taxpayers age 65 and over with incomes between \$30,000 and \$50,000 had an effective rate on their capital gains that was 4 percentage points higher than that of younger taxpayers with the same incomes, primarily because of the effect on the inclusion of Social Security benefits in taxable income. For taxpayers at other income levels, the difference averaged less than 2 percentage points.

Taxes on capital gains are an increasingly important part of total tax liability at higher incomes. They are less than 3 percent of total income tax liability for taxpayers whose incomes are under \$75,000. At the highest income levels, taxes on capital gains are much more significant. The tax on capital gains for people who have incomes of more than \$200,000 accounts for an average of 18 percent of their total income tax.

Taxes on capital gains constitute a much larger share of total income taxes for taxpayers over 64 years old. The share averages 18 percent for older taxpayers, compared with 5 percent for those under 65. The difference arises primarily because capital gains constitute a much larger share of income for older taxpayers (see Figure 4). Taxes on capital gains make up 31 percent of total income taxes for those over age 64 whose incomes exceed \$200,000, compared with 16 percent for taxpayers under 65.

Most of the data in this paper come from samples of taxpayer returns provided by the Internal Revenue Service (IRS) and tabulated by the Congressional Budget Office. CBO used three main data sources to tabulate tax information: the Statistics of Income (SOI) individual income tax sample for selected years, the 1981-based Treasury panel, and the 1985-based Sales of Capital Assets (SOCA) study. Each data source has limitations.

Most previous analyses of capital gains realizations have been based on the SOI samples of individual income tax returns. The IRS compiles these data sets annually. They are a uniquely valuable source of information on the taxable components of income because the sample is quite large—104,357 observations in 1993—and are thought to represent accurately the major components of taxable income and expense for the population. The sample is limited because it provides little information about the transactions that generated taxable income or how individuals' incomes vary over time.

The data from the 1981-based Treasury panel and the 1985-based Sales of Capital Assets study overcome some of the limitations of the SOI sample. The Treasury panel is based on a sample of taxpayers who were followed over a 10-year period. The data show how individuals changed their behavior over time. The 1985-based SOCA follows a sample of taxpayers beginning in 1985 and contains detailed information about the types of transactions that lead to capital gains realizations. Given these rich sources, there are many possible ways of analyzing the data.

SOI Individual Income Sample

Each year, the Statistics of Income division of the Internal Revenue Service collects a sample of more than 100,000 individual income tax returns out of more than 100 million filed. The sample is considered cross-sectional because it represents a "snapshot" of the population at a particular time. Because of the sample's size and the cross-sectional nature of the data, researchers can use it to obtain a fairly accurate picture of the taxable components of income for a particular year. Furthermore, by looking at various years of the sample, researchers can see how population characteristics change over time. The changes do not, however, provide direct information about how people changed their behavior.

For example, in 1993, joint returns with incomes above \$200,000 accounted for about 66 percent of total gains realizations (see Table A-28). For 1985, that category (measured in 1993 dollars) accounted for about 69 percent of gains realizations. But the 1993 and 1985 SOI samples are independent snapshots at a particular time, and the taxpayers in this top bracket change over a period of time.

Higher-income taxpayers make up a disproportionately large share of the IRS samples. For example, about 24 percent of the taxpayers in the sample have incomes above \$1 million, although those taxpayers make up only about 1 percent of the population as a whole. The sample's large share of higher-income taxpayers enables researchers to produce more precise estimates of such variables as capital gains realizations, which are held predominantly by individuals with higher incomes.

Although tabulations of the annual SOI data provide accurate information about the size of total realizations of capital gains for a particular year, they have three main limitations. First, since each year's sample is selected independently, there is no way to determine how the behavior of individual taxpayers may have changed over time. (The SOI sample does include a small subsample of people who are selected at random to be included every year. Because it contains few people with high incomes, it represents only a tiny fraction of capital gains.) Second, the data do not contain information about the characteristics of individual transactions that produced capital gains. And finally, the data do not provide information about the types of assets that people are holding, only those assets that taxpayers have sold.

1981-Based Treasury Panel

CBO used panel data to observe the behavior of taxpayers over time. The 1981based Treasury panel consists of about 20,000 taxpayers who were chosen from the regular 1981 SOI individual income tax sample. Like the SOI, the panel contains a disproportionately higher share of high-income taxpayers. For that subsample, the panel includes tax returns for 1979 to 1988.

The main shortcomings of the Treasury panel were missing returns and variables for certain returns in particular years. A panel member's return might be missing in a particular year for various reasons: the Social Security number was incorrect, the member did not file a return—usually because of income below the filing threshold or death—or the IRS misplaced it. (Returns filed late are included in the sample for the appropriate tax year.) Out of a sample of 19,947 returns, 16,182 were present in all 10 years of the panel. CBO dealt with missing returns by excluding them from its calculation of the average income and gains. For example, if a taxpayer was observed in six out of the 10 years, that taxpayer's average was calculated only from the six available observations. This method is equivalent to assuming that the average values for the missing years equal the average of the observed years.

Internal Revenue Service, Statistics of Income-1993, Individual Income Tax Returns (1996), p. 22.

Alternatively, the tables might have been created under the assumption that gains and income were equal to zero for the missing years. Which assumption is more reasonable? Clearly the assumption that gains and income equal their average values presents the most accurate picture for people who left the sample because they died or were simply lost by the IRS. The assumption that gains and income were zero probably makes more sense for people whose incomes fell below the filing threshold, but it is unlikely that many gains are in that category.

In practice, it makes little difference which assumption is chosen. Under the assumption used in this paper, 56.8 percent of gains were realized by people with average incomes over \$200,000. Under the alternative, 56.4 percent were in that category. Taxpayers with incomes between \$100,000 and \$200,000 accounted for 15.7 percent of gains under the base assumption, 14.6 percent under the alternative. The pattern is reversed for people in the \$75,000 to \$100,000 category, but the difference is still small. The numbers produced under the assumption that missing values are zero would not change any of the qualitative conclusions in the paper.

The problem of missing variables on certain returns arises because the IRS did not collect all variables for all taxpayers for all years of the panel. The IRS data came from two sources: the SOI individual income tax sample and the Returns Transactions File (RTF), which is the file containing all returns.² The RTF contains only a subset of the variables on the SOI. For example, gains from the sales of business property reported on Form 4797 were not available on 12,402 of the 18,035 returns in 1979. Capital gains distributions reported on Schedule D were missing for 7,861 of 16,762 returns collected in 1987. CBO imputed the missing values using the average value of the variables from the years in which they were available.

Another major limitation of the data, as with the SOI individual income tax sample, is that the panel does not contain information about the transactions that generated the gains.

1985-Based SOCA

About every four years, the Statistics of Income division of the Internal Revenue Service produces a data set containing information on the capital gains and losses reported on Schedule D. The purpose is to give researchers additional information about capital gains. The IRS selected a subset of about 56,000 returns from the 1985 SOI individual income tax sample to create the 1985 Sales of Capital Assets file. In addition to the income components that are normally contained in the SOI file, that

^{2.} The panel was originally planned to include only five years: 1979-1983. The later years were added by the Treasury Department using data from the RTF and the annual SOI individual income tax files.

data set contains the information on transactions from Schedule D of the 1040 form on the sales prices, basis, holding periods, and types of assets sold in 1985.³ The file also contains detail for some supporting tax forms: Form 2119 (sale of a residence), Form 4797 (sale of business property), and Form 6252 (installment sales).

From the 1985 SOCA file, the IRS selected an additional subsample of 12,980 returns to be followed over time. Those returns constitute the 1985-based SOCA panel. To produce the data appearing in the body of this paper, CBO tabulated the 1985 SOCA panel in tax year 1993, the most recent year available. CBO analysis focused only on the returns that include capital gains transactions (see Table A-1). In 1993, out of a sample of 13,488 returns, 9,259 returns included capital gains transactions. Additional tabulations of the SOCA data are included at the end of the appendix.

The 1985-based SOCA panel contains the data from taxpayers followed over time, although the tax returns from various years have not been linked. As a result, CBO treats tabulations of the 1993 data sample in this paper as if they were a cross-sectional sample. In order to accomplish that, CBO weighted each return from the 1993 SOCA by its 1985 SOCA weight, which was created by the staff of the Office of Tax Analysis of the Department of the Treasury. Using that method, however, may generate certain problems.⁴

Although the data represent the population fairly accurately in the base year of 1985, the panel becomes less representative of the population over time. That is because members leave the panel and are not replaced. Although new taxpayers entered the economy after 1985, the panel did not add more returns to represent those new entrants. Furthermore, panel members' returns may not have been available for sampling in later years because errors were made in processing, or because the taxpayers died, did not have enough income to file a return, or filed a return later. Moreover, a tax unit's filing status could change in time because of marriage or divorce. For example, a taxpayer who was single in 1985 could have been married

^{3.} For a discussion of the development of the 1985 Sales of Capital Assets project, see Susan Hostetter, "Membership in a Linked Panel of Individual Tax Returns: Review and Results," in American Statistical Association, *Proceedings of the Section on Survey Research Methods*, vol. 2 (Alexandria, Va.: American Statistical Association, 1993); and Dan Holik, "The 1985 Sales of Capital Assets Study," in American Statistical Association, *Proceedings of the Section on Survey Research Methods* (Alexandria, Va.: American Statistical Association, 1989).

^{4.} For a discussion of issues related to the use of panel surveys for cross-sectional estimates, see John Czajka, "Income Stratification in Panel Surveys: Issues in Design and Estimation," in American Statistical Association, *Proceedings of the Section on Survey Research Methods* (Alexandria, Va.: American Statistical Association, 1994).

in later years and thus brought additional income and assets into the sample. Conversely, some individuals may have changed their filing status to single.⁵

In spite of the aging of the panel between 1985 and 1993, it continued to come reasonably close to the large annual SOI samples in terms of the total number of returns and net gains in adjusted gross income (AGI). The 1993 SOI sample indicates that 14.5 million returns reported capital gains, and the 1993 SOCA panel indicates that 15.3 million returns reported capital gains (see Table A-2). The SOI sample finds \$141.6 billion of net gains in AGI; the SOCA panel finds 7 percent less. The 1989 SOCA panel is even closer to the 1989 SOI sample, and the full SOCA file for 1985 is not quite as close on the number of returns but closer on net gains in AGI (see Table A-5 and A-6).

The aging of the panel does appear to have affected the distribution of returns by income in 1993. Compared with the SOI, the SOCA panel includes too few returns with adjusted gross incomes below \$30,000 and too many with incomes above \$30,000. For example, based on the SOCA, about 0.9 million returns with capital gains were in the \$1 to \$10,000 category, compared with about 1.6 million in the SOI. The SOCA estimates imply about 18 percent too few returns with capital gains below \$30,000 and about 21 percent too many returns above \$30,000. Such large distributional differences occur because taxpayers with low incomes in 1985 were less likely to file income tax returns in the later years of the sample than people with higher incomes, because their incomes were more likely to fall below the filing threshold.

An additional problem is that particular returns could have too much weight in later years of the panel. That could take place if taxpayers whose income was normally high had an unusually low income in the year the sample and weights were created. If that took place, the tabulations would be too dependent on those few taxpayers. A few returns with large weights and large transaction values would account for too much of the total capital gains. For example, one return in 1993 was a radical anomaly: it weighed heavily in the calculation, reported hundreds of transactions, and had large capital gains. It was deleted.

CBO examined the sensitivity of the results to the remaining irregularities. For each asset type, the extreme points of the sample were determined by ranking the transactions by their weighted net gains from the lowest to the highest. The distribution of transactions by asset type varies only slightly when the far ends are eliminated (see Table A-3). Using all observations, corporate stock accounts for

39

^{5.} When people who filed joint returns in 1985 change their status to file separate returns in later years, the panel includes both returns. That can cause the total number of returns in the panel to increase, as shown in Table A-1 for 1989 and 1993.

about 43 percent of all transactions, mutual funds for 21 percent, and partnerships, S corporations, and fiduciaries for about 7 percent. After eliminating the largest and smallest 1 percent of weighted transactions, the corporate stock share falls to 38 percent, mutual funds rise to 23 percent, and partnerships, S corporations, and fiduciaries remain at about 7 percent.

The change in the percentage of net gains, however, was more dramatic (see Table A-4). Using all observations, corporate stock accounts for about 32 percent of net gains. Eliminating the largest and smallest 1 percent of weighted transactions causes that share to slip to just 24 percent. Business property falls from 11 percent to 7 percent. Partnerships, S corporations, and fiduciaries rise from 17 percent to 25 percent.

There is no straightforward method of handling the problem. Simply ignoring the transactions at the far ends would be invalid because they could represent important exchanges not represented elsewhere in the sample. CBO could have attempted to adjust the weights of those transactions from an imputation of lifetime income based on observed income over several years of the panel. But all years of the panel are not yet available. In addition, there are many possible ways of adjusting the weights, and the method chosen by CBO could have introduced additional complexity to the interpretation of bias and sources of data. SOI is in the process of revising the weights.

The IRS coded each transaction as one of 21 possible asset types, and CBO further reduced those categories to 15. In addition, to make sure that the total reported gains included those from all sources, CBO created two additional categories for gains that are reported directly on Schedule D and Form 1040 but that are not typically considered transactions because they do not contain the sales price and holding-period information. Those included capital gains distributions from mutual funds, which are on Schedule D and Form 1040, and gains from partnerships, S corporations, and fiduciaries reported on Schedule D. Although employing this method provides a more accurate measure of total gains, it may understate the number of transactions actually involved with the gain because each nonzero value was considered one transaction. In reality, for each single entry of capital gains distributions (or partnerships, S corporations, and fiduciaries) there could have been hundreds of transactions that made up the total gain reported on the single line of the form.

Some calculations required information about the dates on which an asset was purchased and sold. Unfortunately, many transactions lacked complete information on the date the asset was acquired or the date it was sold. Transactions that contained no information about dates were excluded from tabulations based on holding periods. In cases where some information was available, CBO made assumptions about the

missing information. For example, in the 1993 SOCA, for a missing sell date on a long-term transaction, CBO assumed July 1, 1993. That was assumed for about 8 percent of the transactions. For missing sell dates on short-term transactions, CBO assumed a holding period of six months (about 4 percent of the transactions). If a long-term transaction lacked information about the year the asset was bought, the transaction was not used in the tabulation, since no easy assumption could be made. As a result, CBO discarded about 11 percent of the transactions. In some cases, the sales price, basis, and gain or loss reported for the transaction were inconsistent. CBO discarded about 8 percent of the transactions because of those problems.

Additional Tables

Tables A-7 to A-28 present additional information derived from these data sets. In addition to underlying detail for many of the tables in the text, they also report tabulations of additional years' data, information about holding periods, and various other perspectives on the data.

TABLE A-1. NUMBER OF TAX RETURNS, TOTAL AND SAMPLES

Sample	Returns			
Income Tax Returns Filed in 1985	101,836,347	11,125,595		
SOI Individual Income Sample in 1985 SOCA File in 1985 SOCA Panel in 1985 SOCA Panel in 1989 SOCA Panel in 1993	121,480 56,649 12,980 13,519 13,488	58,965 31,168 8,071 8,912 9,259		

SOURCE: Congressional Budget Office based on tabulations of the 1993 Sales of Capital Assets panel; Internal Revenue Service; the 1985 Statistics of Income individual income tax return data; and Susan Hostetter, "Membership in a Linked Panel of Individual Tax Returns: Review and Results," in American Statistical Association, *Proceedings of the Section on Survey Research Methods, Volume II* (Alexandria, VA: American Statistical Association, 1993).

NOTES: Samples are described in text of Appendix.

SOI = Statistics of Income, SOCA = Sales of Capital Assets.

TABLE A-2. DIFFERENCES IN CAPITAL GAINS DATA BETWEEN 1993 STATISTICS OF INCOME AND SOCA PANEL IN 1993 (Numbers of returns are in thousands of dollars, gains are in millions of dollars)

		Re	eturns			Net Gains in AGI				
				Percent				Percent		
Adjusted Gross Income	SOI	SOCA	Difference	Difference	SOI	SOCA	Difference	Difference		
Less Than 0	292	278	14	5	5,635	5,200	435	8		
0 to 10,000	1,611	900	711	44	1,123	293	830	74		
10,000 to 20,000	1,802	1,784	18	1	3,325	1,346	1,979	60		
20,000 to 30,000	1,593	1,312	281	18	3,748	2,520	1,228	33		
30,000 to 40,000	1,561	1,676	-115	-7	3,928	3,440	488	12		
40,000 to 50,000	1,276	1,489	-213	-17	4,730	5,269	-539	-11		
50,000 to 75,000	2,584	3,221	-637	-25	10,344	6,622	3,722	36		
75,000 to 100,000	1,385	1,728	-343	-25	8,541	7,255	1,286	15		
100,000 to 200,000	1,596	1,953	-357	-22	20,074	25,477	-5,403	-27		
200,000 and Over	<u>764</u>	988	<u>-224</u>	-29	80,128	74,646	<u>5,482</u>	7		
Total	14,465	15,329	-864	-6	141,577	132,069	9,508	7		

SOURCE: Congressional Budget Office based on tabulations of the 1993 Sales of Capital Assets panel and the 1993 Statistics of Income individual income tax return data.

NOTES: SOI = Statistics of Income.

SOCA = Sales of Capital Assets.

AGI = adjusted gross income.

TABLE A-3. SHARE OF TRANSACTIONS BY ASSET TYPE FOR FULL SOCA SAMPLE AND SAMPLE WITH EXCLUSIONS FOR EXTREME OBSERVATIONS, 1993 (In percent)

	All Obser-		Excl	uded Tails (Pe	ercent)	
Type of Asset	vations	0.10	0.25	0.50	1.00	2.00
Corporate Stock	43.3	42.4	41.3	39.6	38.0	35.4
Mutual Funds						
Capital gain distributions	9.4	9.9	10.1	10.7	11.3	12.5
Sales of shares	11.3	11.2	11.5	11.7	12.1	12.1
Put and Call Options, Commodities						
Futures, and Other Securities	5.0	5.1	5.1	5.0	5.2	5.4
Federal Obligations	2.2	2.1	2.2	2.3	2.4	2.7
State and Local Government Obligations	5.1	5.0	5.1	5.1	5.0	4.8
Other Bonds, Notes, and Debentures	1.6	1.7	1.8	1.8	1.9	2.2
Sale of Principal Residence	3.3	3.5	3.7	3.9	4.4	5.0
Other Personal Residence	0.2	0.2	0.2	0.2	0.2	0.2
Residential Rental Property	1.6	1.7	1.8	1.8	1.9	1.9
Land Other Than Farmland	1.3	1.4	1.4	1.5	1.3	1.4
Partnerships, S Corporations, Fiduciaries	6.5	6.6	6.7	7.0	6.9	6.6
Business Property	2.3	2.2	2.3	2.3	2.2	2.3
Livestock	1.0	1.1	1.1	1.2	1.3	1.3
Γimber	0.1	0.1	0.1	0.1	0.1	0.1
Farmland	0.1	0.1	0.1	0.1	0.1	0.1
Other	5.7	5.8	5.8	5.7	5.7	6.1
Total	100.0	100.0	100.0	100.0	100.0	100.0

SOURCE: Congressional Budget Office based on tabulations of the 1993 Sales of Capital Assets panel.

NOTES: For each asset type, the tails of the distribution were determined by ranking the observations by their net gains from the lowest to the highest. The percentage shown represents the total share of the lowest and highest observations that were excluded from the tabulation.

SOCA = Sales of Capital Assets.

TABLE A-4. SHARE OF NET GAINS BY ASSET TYPE FOR FULL SOCA SAMPLE AND SAMPLE WITH EXCLUSIONS FOR EXTREME OBSERVATIONS, 1993 (In percent)

	All Obser-		Evc1	uded Tails (Pe	ercent)	
Type of Asset	vations	0.10	0.25	0.50	1.00	2.00
Corporate Stock	31.5	28.5	26.4	24.8	23.5	23
Mutual Funds						
Capital gain distributions	7.3	10.7	11.9	12.7	13.4	14.7
Sales of shares	2.1	2.6	2.6	2.8	2.8	2.8
Put and Call Options, Commodities						
Futures, and Other Securities	0.1	0.4	0.5	0.5	0.5	0.4
Federal Obligations	0.6	1.0	1.0	1.1	1.2	1.3
State and Local Government Obligations	1.0	1.8	1.7	1.6	1.5	1.4
Other Bonds, Notes, and Debentures	0.5	0.6	0.7	0.7	0.8	0.9
Sale of Principal Residence	2.0	2.6	3.1	2.8	2.8	1.8
Other Personal Residence	0.1	0	0.1	0.1	0.1	0.5
Residential Rental Property	5.6	5.8	6.1	6.3	6.4	6.3
Land Other Than Farmland	3.5	4.5	4.1	4.5	5.0	5.5
Partnerships, S Corporations, Fiduciaries	17.3	22.3	22.9	23.8	25.2	26.7
Business Property	11.4	7.6	7.9	7.8	7.0	5.8
Livestock	1.0	1.2	1.3	1.3	1.3	1.2
Timber	0.9	0.4	0.4	0.5	0.7	0.5
Farmland	0.9	0.7	0.9	1.0	1.3	1.1
Other	14.3	9.4	8.5	7.6	6.6	<u>6.0</u>
Total	100.0	100.0	100.0	100.0	100.0	100.0

SOURCE: Congressional Budget Office based on tabulations of 1993 Sales of Capital Assets panel.

NOTES: For each asset type, the tails of the distribution were determined by ranking the observations by their net gains from the lowest to the highest. The percentage shown represents the total share of the lowest and highest observations that were excluded from the tabulation.

SOCA = Sales of Capital Assets.

TABLE A-5. DIFFERENCES IN CAPITAL GAINS DATA BETWEEN 1985 SOI AND SOCA PANEL IN 1985 (Numbers of returns are in thousands, gains are in millions of dollars)

		Returns					Net Gains in AGI				
				Percent				Percent			
Adjusted Gross Income	SOI	SOCA	Difference	Difference	SOI	SOCA	Difference	Difference			
Less Than 0	255	399	-144	-57	4,653	4,624	29	1			
0 to 10,000	1,238	1,563	-325	-26	1,172	1,090	82	7			
10,000 to 20,000	1,762	1,984	-222	-13	1,908	1,888	20	1			
20,000 to 30,000	1,780	2,024	-244	-14	2.345	2,294	51	2			
30,000 to 40,000	1,584	1,744	-160	-10	2,899	2,704	195	7			
40,000 to 50,000	1,271	1,474	-203	-16	2,854	2,618	236	8			
50,000 to 75,000	1,748	1,882	-134	-8	6,570	6,412	158	2			
75,000 to 100,000	642	695	-53	-8	4,089	4,172	-84	-2			
100,000 to 200,000	598	627	-29	-5	9,493	9,442	51	1			
200,000 and Over	<u>250</u>	248	2	1	31,713	30,565	<u>1,148</u>	4			
Total	11,128	12,640	-1,512	-14	67,694	65,810	1,884	3			

SOURCE: Congressional Budget Office based on tabulations of 1985 Sales of Capital Assets file and the 1985 Statistics of Income individual income tax return data.

NOTES: SOI = Statistics of Income.

SOCA = Sales of Capital Assets.

AGI = adjusted gross income.

TABLE A-6. DIFFERENCES IN CAPITAL GAINS DATA BETWEEN 1989 SOI AND SOCA PANEL IN 1989 (Numbers of returns are in thousands, gains are in millions of dollars)

		Returns					Net Gains in AGI			
Adjusted Gross Income	SOI	SOCA	Difference	Percent Difference	SOI	SOCA	Difference	Percent Difference		
Less Than 0	256	162	94	37	6,612	5,221	1,391	21		
0 to 10,000	1,299	995	304	23	880	438	442	50		
10,000 to 20,000	1,673	1,374	299	18	2,243	769	1,474	66		
20,000 to 30,000	1,559	1,399	160	10	3,199	1,078	2,121	66		
30,000 to 40,000	1,498	1,437	61	4	3,484	1,604	1,880	54		
40,000 to 50,000	1,390	1,325	65	5	4,560	3,292	1,268	28		
50,000 to 75,000	2,277	3,085	-808	-35	10,367	13,264	-2,897	-28		
75,000 to 100,000	1,163	1,208	-45	-4	8,896	8,110	786	9		
100,000 to 200,000	1,129	1,150	-21	-2	18,729	23,517	-4,788	-26		
200,000 and Over	602	<u>707</u>	<u>-105</u>	-17	85,034	86,970	<u>-1,936</u>	-2		
Total	12,846	12,841	5	a	144,004	144,263	-259	a		

SOURCE: Congressional Budget Office based on tabulations of 1989 Sales of Capital Assets panel and the 1989 Statistics of Income individual income tax return data.

NOTES: SOI = Statistics of Income.

SOCA = Sales of Capital Assets.

AGI = adjusted gross income.

a. Less than 0.5.

TABLE A-7. COMPOSITION OF CAPITAL GAINS AND LOSSES, BY ASSET TYPE, 1985 (In percent)

		Dollar Value of Gains (Percentage of total)			Number of Transactions (Percentage of total)			Gains per Transaction (Average in dollars)		
Asset Type	Negative Gains	Positive Gains	Net Gains	Negative Gains	Positive Gains	All Gains	Negative Gains	Positive Gains	Net Gains	
Corporate Stock	44.6	39.0	37.8	57.5	47.4	50.3	-2,033	5,027	2,742	
Mutual Funds										
Capital gain distributions	0	1.6	1.9	0	6.4	4.6	-3,938	1,489	1,483	
Sales of shares	1.5	0.6	0.5	4.0	2.8	3.1	-972	1,439	557	
Put and Call Options, Commodities	11.0	1.0	0	144	(2	0.5	1 005	1 022	0	
Futures, and Other Securities	11.0	1.9	0	14.4	6.2	8.5	-1,995	1,822	0	
Federal Obligations	0.4	0.2	0.2	1.6	0.8	1.0	-713	1,684	627	
State and Local Government Obligations	1.9	0.8	0.6	3.1	3.1	3.1	-1,582	1,591	690	
Other Bonds, Notes, and Debentures	1.7	0.5	0.3	1.7	1.8	1.8	-2,650	1,687	534	
0.1 (D: :1 D :1		1.0	1.5		4.1	2.0		1.012	1.010	
Sale of Principle Residence	n.a.	1.3	1.5	n.a.	4.1	2.9	n.a.	1,912	1,912	
Other Personal Residence	0	0.2	0.3	0	0.2	0.1	-240	8,757	8,101	
Residential Rental Property	3.0	9.5	10.8	0.9	4.9	3.8	-8,794	11,862	10,482	
Land Other Than Farmland	1.5	6.2	7.1	0.6	2.8	2.2	-6,389	13,646	12,056	
Partnerships, S Corporations, Fiduciaries	15.0	21.8	23.2	7.3	7.7	7.6	-5,375	17,396	11,173	
Business Property	3.5	8.2	9.2	2.1	4.8	4.0	-4,404	10,430	8,254	
Livestock	0.8	1.0	1.0	1.8	2.4	2.2	-1,135	2,426	1,627	
Timber	0.1	0.3	0.3	0.1	0.2	0.2	-2,452	7,873	6,146	
Farmland	0.9	0.9	0.9	0.1	0.6	0.5	-40,846	9,024	7,178	
Other	14.2	6.1	4.5	4.8	3.9	4.1	-7,759	9,683	3,958	
Total	100.0	100.0	100.0	100.0	100.0	100.0	-2,623	6,117	3,644	
Memorandum: Dollar totals (Millions)	-32,292	190,847	158,556	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
Return totals (Thousands)	n.a.	n.a.	n.a.	12,310	31,198	43,508	n.a.	n.a.	n.a.	

SOURCE: Congressional Budget Office based on tabulations of the 1985 Sales of Capital Assets file.

NOTE: n.a. = not applicable.

TABLE A-8. COMPOSITION OF CAPITAL GAINS AND LOSSES, BY ASSET TYPE, 1989 (In percent)

		lar Value of ercentage of t			ber of Transa			ns per Transa verage in doll	
Asset Type	Negative Gains	Positive Gains	Net Gains	Negative Gains	Positive Gains	All Gains	Negative Gains	Positive Gains	Net Gains
Corporate Stock	43.7	29.8	25.2	51.5	39.9	43.7	-2,604	4,456	1,731
Mutual Funds									
Capital gain distributions	0	2.8	3.8	0.3	7.6	5.2	-91	2,216	2,175
Sales of shares	5.7	0.9	-0.8	7.7	4.4	5.5	-2,266	1,166	-417
Put and Call Options, Commodities									
Futures and other securities	14.3	2.1	-1.9	14.2	10.3	11.6	-3,094	1,240	-501
Federal Obligations	0.9	0.9	0.9	2.5	2.5	2.5	-1,111	2,276	1,145
State and Local Government Obligations	2.0	1.7	1.6	4.4	3.2	3.6	-1,353	3,184	1,346
Other Bonds, Notes, and Debentures	1.7	0.2	-0.3	1.5	1.0	1.2	-3,471	1,155	-794
Sale of Principle Residence	n.a.	6.8	9.1	n.a.	6.0	4.0	n.a.	6,741	6,741
Other Personal Residence	0.4	3.4	4.4	0.3	0.9	0.7	-4,105	21,841	18,522
Residential Rental Property	1.2	5.4	6.8	0.6	3.0	2.2	-6,093	10,847	9,346
Land Other Than Farmland	0.7	5.6	7.2	0.4	2.3	1.7	-5,852	14,473	13,012
Partnerships, S Corporation, Fiduciaries	9.0	24	29.1	9.4	8.0	8.5	-2,926	17,957	10,338
Business Property	2.8	10.2	12.8	1.3	3.2	2.6	-6,657	19,194	14,991
Livestock	0.2	0.8	1.0	0.7	1.5	1.2	-965	3,244	2,495
Timber	0	0.3	0.4	0.1	0.2	0.2	-384	8,827	6,725
Farmland	1.5	1.2	1.1	0.1	0.2	0.2	-40,906	34,153	18,615
Other	16.1	3.8	0.3	5.0	5.8	5.5	-9,941	3,899	-180
Total	100.0	100.0	100.0	100.0	100.0	100.0	-3,072	5,970	3,007
Memorandum: Dollar totals (Millions)	-48,775	194,545	145,770	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Return totals (Thousands)	n.a.	n.a.	n.a.	15,880	32,590	48,469	n.a.	n.a.	n.a.

SOURCE: Congressional Budget Office based on tabulations of the 1989 Sales of Capital Assets panel.

NOTE: n.a. = not applicable.

TABLE A-9. COMPOSITION OF CAPITAL GAINS AND LOSSES, BY ASSET TYPE, 1993 (In percent)

		lar Value of ercentage of t			Number of Transactions (Percentage of total)			Gains per Transaction (Average in dollars)		
Asset Type	Negative Gains	Positive Gains	Net Gains	Negative Gains	Positive Gains	All Gains	Negative Gains	Positive Gains	Net Gains	
Corporate Stock	51.9	36.6	31.5	61.9	36.1	43.3	-2,213	4,107	1,606	
Mutual Funds										
Capital gain distributions	0	5.5	7.3	0	13.0	9.4	-7,674	1,701	1,699	
Sales of shares	2.8	2.2	2.1	11.8	11.1	11.3	-633	821	401	
Put and Call Options, Commodities										
Futures and other securities	3.5	0.9	0.1	4.2	5.4	5.0	-2,153	702	40	
Federal Obligations	0.5	0.6	0.6	1.5	2.5	2.2	-968	972	614	
State and Local Government Obligations	3.5	1.6	1.0	3.3	5.7	5.1	-2,755	1,146	439	
Other Bonds, Notes, and Debentures	0.9	0.6	0.5	0.8	2.0	1.6	-3,089	1,212	644	
Sale of Principle Residence	n.a.	1.5	2.0	n.a.	4.5	3.3	n.a.	1,316	1,316	
Other Personal Residence	0.4	0.2	0.1	0	0.2	0.2	-25,865	3,555	1,184	
Residential Rental Property	1.9	4.7	5.6	1.1	1.8	1.6	-4,570	10,565	7,712	
Land Other Than Farmland	0.8	2.9	3.5	0.8	1.5	1.3	-2,563	7,534	5,790	
Partnerships, S Corporation, Fiduciaries	15.3	16.8	17.3	6.9	6.3	6.5	-5,875	10,803	5,889	
Business Property	2.0	9.1	11.4	0.7	2.8	2.3	-7,257	12,917	11,079	
Livestock	0.1	0.8	1.0	0.3	1.3	1.0	-1,508	2,527	2,243	
Timber	0	0.7	0.9	0	0.2	0.1	-214	15,925	14,630	
Farmland	0.1	0.7	0.9	0	0.2	0.1	-29,366	15,243	14,398	
Other	16.2	14.8	14.3	6.6	_ 5.3	5.7	-6,503	11,262	5,560	
Total	100.0	100.0	100.0	100.0	100.0	100.0	-2,642	4,054	2,202	
Memorandum: Dollar totals (Millions)	-43,671	175,321	131,649	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	
Return totals (Thousands)	n.a.	n.a.	n.a.	16,530	43,245	59,775	n.a.	n.a.	n.a.	

SOURCE: Congressional Budget Office based on tabulations of the 1993 Sales of Capital Assets panel.

NOTE: n.a. = not applicable.

TABLE A-10. ASSET SALE PRICE, BASIS, AND GAINS BY ASSET TYPE, 1985 (In millions of 1985 dollars)

		Gains from	Transactions	with Valid Sal	es Price		
Asset Type	Sales Price	Basis	Gains Before Adjust- ments	Exclusions or Basis Adjust- ments	Net Gains	Gains from Transactions with Missing Sales Price	
Comparata Stools	221 110	156 269	64,851	-5,357	50.402	470	
Corporate Stock Mutual Funds	221,119	156,268	04,831	-3,337	59,493	470	
Capital gain distributions	0	0	0	0	0	2,960	
Sales of shares	10,117	9,493	624	4	628	127	
Put and Call Options, Commodities	,	2,122		-			
Futures, and Other Securities	16,933	17,624	-691	-9	-700	701	
Federal Obligations	29,016	28,763	253	-1	252	19	
State and Local Government Obligations	28,738	27,824	914	15	929	1	
Other Bonds, Notes, and Debentures	29,836	29,397	439	-6	433	-12	
Sale of Principle Residence	111,156	74,505	36,651	-34,223	2,428	0	
Other Personal Residence	1,208	771	437	-145	292	147	
Residential Rental Property	57,937	39,877	18,059	-1,847	16,212	917	
Land Other Than Farmland	22,960	8,947	14,013	-3,194	10,819	497	
Partnerships, S Corporations, Fiduciaries	10,073	4,622	5,451	-90	5,362	31,429	
Business Property	46,723	33,148	13,574	690	14,265	282	
Livestock	2,669	1,484	1,186	287	1,473	117	
Timber	919	390	529	-76	453	6	
Farmland	4,024	2,437	1,587	-224	1,363	65	
Other	21,739	15,763	5,976	658	6,634	<u>490</u>	
Total	615,166	451,313	163,854	-43,518	120,336	38,215	

SOURCE: Congressional Budget Office based on tabulations of the 1985 Sales of Capital Assets file.

NOTE: The last column represents the gains from transactions with a missing or inconsistent sales price. Taxpayers may exclude part of their gain based on the purchase of a new home reported on Form 2119, the election of a one-time age exclusion on Form 2119, the use of fixing-up expenses and expenses of sale reported on Form 2119 and Form 6252, and the recapture of depreciation from Section 1245, 1250, 1252, 1254, and 1255 property on Form 4797. Taxpayers must adjust the basis of their property to account for allowed depreciation reported on Forms 4797 and 6252.

TABLE A-11. ASSET SALE PRICE, BASIS, AND GAINS BY ASSET TYPE, 1989 (In millions of 1989 dollars)

		Gains from	Transactions	with Valid Sal	es Price	
Asset Type	Sales Price	Basis	Gains Before Adjust- ments	Exclusions or Basis Adjust- ments	Net Gains	Gains from Transactions with Missing Sales Price
	260.070	220 717	20.152	1.510	26.610	1.6
Corporate Stock Mutual Funds	368,870	330,717	38,153	-1,513	36,640	46
Capital gain distributions	0	0	0	0	0	5,493
Sales of shares	59,422	60,535	-1,113	0	-1,113	9
Put and Call Options, Commodities	37,122	00,555	1,113	· ·	1,113	
Futures, and Other Securities	50,175	53,147	-2,973	4	-2,969	155
Federal Obligations	60,632	59,314	1,318	10	1,328	50
State and Local Government Obligations	51,024	48,683	2,340	0	2,340	6
Other Bonds, Notes, and Debentures	30,509	30,728	-219	5	-214	-244
Sale of Principle Residence	317,169	151,439	165,730	-152,514	13,216	0
Other Personal Residence	68,239	39,650	28,589	-22,193	6,396	0
Residential Rental Property	34,090	25,591	8,500	826	9,325	597
Land Other Than Farmland	26,322	12,451	13,871	-3,321	10,549	0
Partnerships, S Corporations, Fiduciaries	14,395	8,346	6,049	-251	5,799	36,606
Business Property	45,437	37,433	8,003	10,596	18,599	-4
Livestock	2,452	1,488	963	380	1,344	145
Timber	1,125	545	580	2	582	2
Farmland	5,382	5,917	-535	2,070	1,535	28
Other	45,126	45,755	<u>-630</u>	257	372	108
Total	1,180,368	911,741	268,627	-165,642	102,985	42,783

SOURCE: Congressional Budget Office based on tabulations of the 1989 Sales of Capital Assets panel.

NOTE: The last column represents the gains from transactions with a missing or inconsistent sales price. Taxpayers may exclude part of their gain based on the purchase of a new home reported on Form 2119, the election of a one-time age exclusion on the Form 2119, the use of fixing-up expenses and expenses of sale reported on Form 2119 and Form 6252, and the recapture of depreciation from Section 1245, 1250, 1252, 1254, and 1255 property on Form 4797. Taxpayers must adjust the basis of their property to account for allowed depreciation reported on Forms 4797 and 6252.

TABLE A-12. ASSET SALE PRICE, BASIS, AND GAINS BY ASSET TYPE, 1993 (In millions of 1993 dollars)

		Sains from Trar	sactions with	Valid Sales Pr	rice	
Asset Type	Sales Price	Basis	Gains Before Adjust- ments	Exclusions or Basis Adjust- ments	Net Gains	Gains from Transactions with Missing Sales Price
Comparata Stock	294.051	242 220	42 621	1 202	41 220	187
Corporate Stock Mutual Funds	384,951	342,320	42,631	-1,292	41,339	187
Capital gain distributions	0	0	0	0	0	9,585
Sales of shares	86,253	83,685	2,568	0	2,568	133
Put and Call Options, Commodities	,	,,,,,,	,		7	
Futures, and Other Securities	36,068	35,473	596	3	599	-478
Federal Obligations	143,338	142,529	810	0	810	1
State and Local Government Obligations	72,013	70,696	1,317	9	1,327	1
Other Bonds, Notes, and Debentures	24,566	23,884	682	-54	628	1
Sale of Principle Residence	236,466	189,287	47,179	-44,592	2,587	0
Other Personal Residence	2,822	2,124	698	-598	100	8
Residential Rental Property	30,991	22,637	8,354	-885	7,468	-86
Land Other Than Farmland	16,001	10,466	5,535	-883	4,652	3
Partnerships, S Corporations, Fiduciaries	10,449	8,466	1,983	-697	1,286	21,429
Business Property	41,438	41,010	428	14,276	14,704	276
Livestock	3,061	1,662	1,400	-19	1,381	0
Timber	1,427	269	1,158	0	1,158	2
Farmland	4,628	2,964	1,664	-544	1,120	4
Other	51,481	41,831	9,650	2,383	12,033	6,828
Total	1,145,952	1,019,300	126,652	-32,891	93,761	37,894

SOURCE: Congressional Budget Office based on tabulations of the 1993 Sales of Capital Assets panel.

NOTE: The last column represents the gains from transactions with a missing or inconsistent sales price. Taxpayers may exclude part of their gain based on the purchase of a new home reported on Form 2119, the election of a one-time age exclusion on Form 2119, the use of fixing-up expenses and expenses of sale reported on Form 2119 and Form 6252, and the recapture of depreciation from Section 1245, 1250, 1252, 1254, and 1255 property on Form 4797. Taxpayers must adjust the basis of their property to account for allowed depreciation reported on Forms 4797 and 6252.

TABLE A-13. AVERAGE ASSET HOLDING PERIOD BY ASSET TYPE, 1985 (By number of years)

	Aver	age Holding P	Period	Sta	ndard Deviati	on		Percentage
Asset Type	All Gains	Long- Term Gains	Short- Term Gains	All Gains	Long- Term Gains	Short- Term Gains	Number of Transactions	of Gains that are Long Term
Asset Type	Gaills	Gams	Gains	Gailis	Gaills	Gaills	Transactions	Long Term
Corporate Stock	5.6	8.2	0.2	7.2	10.7	0.2	21,871	71
Mutual Funds							,	
Capital gain distributions	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	1,996	100
Sales of shares	2.6	4.1	0.3	3.4	5.6	0.3	1,358	75
Put and Call Options, Commodities								
Futures, and Other Securities	1.1	2.2	0.2	1.4	3.0	0.2	3,715	18
Federal Obligations	0.9	2.0	0.2	0.7	1.7	0.2	433	76
State and Local Government Obligations	2.5	3.5	0.3	2.9	4.2	0.3	1,347	81
Other Bonds, Notes, and Debentures	1.0	4.3	0.1	1.2	5.2	0.2	785	54
Sale of Personal Residence	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	1,270	100
Other Personal Residence	9.3	10.0	0.1	12.7	13.6	0	54	93
Residential Rental Property	7.9	8.1	0.3	7.5	7.7	0.2	1,634	97
Land Other Than Farmland	11.2	11.7	0.3	9.9	10.3	0.3	939	96
Partnerships, S Corporations, Fiduciaries	6.8	7.2	0.4	8.2	8.6	0.2	3,293	77
Business Property	7.7	7.8	0.2	7.2	7.2	0.2	1,762	98
Livestock	4.1	4.2	0.3	2.7	2.9	0.2	977	99
Timber	6.9	7.0	0.3	10.9	11.1	0.4	75	97
Farmland	12.8	12.8	0.3	11.8	11.8	0.2	199	100
Other	7.2	8.6	0.3	8.0	9.7	0.2	_1,800	72
Total	5.6	7.7	0.2	6.6	9.2	0.2	43,508	73

SOURCE: Congressional Budget Office based on tabulations of the 1985 Sales of Capital Assets file.

NOTES: Average holding periods were weighted by sales price. Calculation excludes transactions with missing holding period information or inconsistent sales prices. Transaction totals and percentage of gains that are long term are based on all transactions.

n.a. = not available.

TABLE A-14. AVERAGE ASSET HOLDING PERIOD BY ASSET TYPE, 1989 (By number of years)

	Aver	age Holding F	Period	Sta	ndard Deviati	on		Percentage	
	All	Long- Term	Short- Term	All	Long- Term	Short- Term	Number of	of Gains that are	
Asset Type	Gains	Gains	Gains	Gains	Gains	Gains	Transactions	Long Term	
Corporate Stock	1.9	5.3	0.2	2.3	6.8	0.2	21,191	54	
Mutual Funds									
Capital gain distributions	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	2,525	100	
Sales of shares	1.6	3.5	0.4	1.4	3.7	0.2	2,643	68	
Put and Call Options, Commodities									
Futures, and Other Securities	1.2	3.2	0.3	0.9	2.9	0.2	5,623	31	
Federal Obligations	1.1	2.3	0.4	0.6	1.6	0.2	1,203	72	
State and Local Government Obligations	2.8	4.0	0.4	1.8	2.7	0.3	1,743	84	
Other Bonds, Notes, and Debentures	1.2	3.1	0.2	1.1	3.3	0.3	578	69	
Sale of Personal Residence	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	1,961	100	
Other Personal Residence	20.0	22.1	0.7	6.8	7.5	0	345	70	
Residential Rental Property	5.0	5.5	0.8	5.4	5.9	0.2	1,062	96	
Land Other Than Farmland	12.5	13.2	0.6	9.7	10.2	0.2	811	97	
Partnerships, S Corporations, Fiduciaries	7.3	7.8	0.4	7.7	8.3	0.4	4,102	83	
Business Property	9.5	9.5	0.4	5.8	5.8	0.2	1,240	100	
Livestock	3.6	3.6	0.3	1.8	1.9	0.1	597	100	
Timber	9.2	13.3	0.1	7.9	11.5	0.2	87	69	
Farmland	13.3	13.3	0	11.9	11.9	0	84	100	
Other	2.8	6.1	0.5	2.5	6.1	0.2	_2,674	63	
Total	4.5	8.8	0.3	4.6	9.2	0.3	48,469	64	

SOURCE: Congressional Budget Office based on tabulations of the 1989 Sales of Capital Assets panel.

NOTES: Average holding periods were weighted by sales price. Calculation excludes transactions with missing holding period information or inconsistent sales prices. Transaction totals and percentage of gains that are long term are based on all transactions.

n.a. = not available.

TABLE A-15. AVERAGE ASSET HOLDING PERIOD BY ASSET TYPE, 1993 (By number of years)

	Aver	age Holding F	Period	Sta	ndard Deviati	on		Percentage
		Long-	Short-		Long-	Short-		of Gains
	All	Term	Term	All	Term	Term	Number of	that are
Asset Type	Gains	Gains	Gains	Gains	Gains	Gains	Transactions	Long Term
Corporate Stock	2.9	6.3	0.3	3.4	7.9	0.3	25,861	49
Mutual Funds								
Capital gain distributions	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	5,641	100
Sales of shares	1.4	2.1	0.5	1.6	2.6	0.2	6,738	54
Put and Call Options, Commodities								
Futures, and Other Securities	2.5	4.3	0.4	2.9	5.4	0.2	3,019	66
Federal Obligations	0.6	2.5	0.2	0.4	2.0	0.3	1,321	64
State and Local Government Obligations	4.3	5.3	0.5	3.5	4.4	0.3	3,026	81
Other Bonds, Notes, and Debentures	2.8	5.7	0.3	2.9	6.2	0.3	978	78
Sale of Personal Residence	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	1,966	100
Other Personal Residence	15.0	15.0	0.6	8.2	8.2	0.2	91	100
Residential Rental Property	13.3	13.5	0.3	11.3	11.5	0.3	957	97
Land Other Than Farmland	10.7	10.8	0.6	8.5	8.6	0.1	804	99
Partnerships, S Corporations, Fiduciaries	6.9	8.1	0.4	8.8	10.4	0.3	3,857	77
Business Property	6.4	6.4	0.5	3.9	3.9	0.3	1,352	100
Livestock	3.4	3.4	0.5	2.0	2.0	0.4	616	100
Timber	40.7	40.8	0.6	13.5	13.5	0.4	79	100
Farmland	10.6	10.6	0.3	6.4	6.4	0.3	78	99
Other	6.5	9.8	0.4	4.1	6.4	0.2	3,391	82
Total	3.6	6.7	0.3	4.0	7.7	0.3	59,775	66

SOURCE: Congressional Budget Office based on tabulations of the 1993 Sales of Capital Assets panel.

NOTES: Average holding periods were weighted by sales price. Calculation excludes transactions with missing holding period information or inconsistent sales prices. Transaction totals and percentage of gains that are long term are based on all transactions.

n.a. = not available.

TABLE A-16. TAX RETURNS AND CAPITAL GAINS BY NUMBER OF GAINS TRANSACTIONS, 1985

		Average		
Number of Transactions	Returns (Percent)	Returns With Gains (Percent)	Gains (Percent)	Gain Per Return (Dollars)
0	88.1	0	0	0
1	5.1	42.8	13.2	4,047
2	2.5	20.9	10.6	6,641
3 - 5	2.6	21.6	25.2	15,270
6 - 10	1.1	8.9	19.3	28,383
11 - 25	0.5	4.5	17.7	51,333
26 - 50	0.1	0.7	8.2	144,083
More Than 50	0.1	0.5	5.8	146,028
Total	100	100	100	13,116

SOURCE: Congressional Budget Office tabulations of the 1985 Sales of Capital Assets file.

TABLE A-17. TAX RETURNS AND CAPITAL GAINS BY NUMBER OF GAINS TRANSACTIONS, 1989

		Average		
Number of Transactions	Returns (Percent)	Returns With Gains (Percent)	Gains (Percent)	Gain Per Return (Dollars)
0	88.8	0	0	0
1	4.8	43.1	17.2	4,635
2	2.1	19.0	12.1	7,431
3 - 5	2.4	21.5	21.9	11,869
6 - 10	1.0	8.7	14.9	19,932
11 - 25	0.7	6.2	20.7	38,870
26 - 50	0.1	1.3	5.8	51,134
More Than 50	<u>a</u>	0.2	<u>7.4</u>	389,161
Total	100	100	100	11,641

SOURCE: Congressional Budget Office tabulations of the 1989 Sales of Capital Assets panel.

a. Less than 0.05.

TABLE A-18. NOMINAL AND REAL CAPITAL GAINS FOR ALL CAPITAL ASSETS EXCEPT BONDS, BY INCOME, 1985

			Nominal Gains (Millions of dollars)			Gains of dollars)
	Returns	Transactions	No	Current Law	No	Current Law
Income	(Thousands)	(Thousands)	Loss Limit	Loss Limit	Loss Limit	Loss Limit
Less Than 0	242	710	2,804	3,895	-304	2,523
0 to 10,000	1,115	2,481	2,766	3,046	-1,471	1,240
10,000 to 20,000	1,314	3,506	3,058	3,712	-3,487	683
20,000 to 30,000	1,478	4,361	4,373	5,078	-8,632	881
30,000 to 40,000	1,092	3,684	3,924	5,732	-4,734	1,475
40,000 to 50,000	1,039	3,265	4,702	5,226	-2,250	2,110
50,000 to 75,000	1,408	5,788	12,864	13,697	-369	6,548
75,000 to 100,000	561	2,498	7,410	7,892	302	3,687
100,000 to 200,000	476	3,111	14,324	14,960	5,487	9,215
200,000 and Over	<u> 177</u>	2,148	<u>41,423</u>	42,026	30,618	<u>34,245</u>
Total	8,903	31,549	97,649	105,265	15,160	62,607

SOURCE: Congressional Budget Office tabulations of the 1985 Sales of Capital Assets file.

TABLE A-19. NOMINAL AND REAL CAPITAL GAINS FOR ALL CAPITAL ASSETS EXCEPT BONDS, BY INCOME, 1989

			Nominal Gains (Millions of dollars)			Gains of dollars)
Income	Returns (Thousands)	Transactions (Thousands)	No Loss Limit	Current Law Loss Limit	No Loss Limit	Current Law Loss Limit
Less Than 0	242	830	-1,215	870	-6,751	400
0 to 10,000	981	1,889	-805	439	-3,546	-599
10,000 to 20,000	1,133	2,753	-650	1,658	-8,600	-256
20,000 to 30,000	963	2,047	218	895	-6,537	-633
30,000 to 40,000	836	4,525	7,704	8,095	2,576	5,736
40,000 to 50,000	749	2,652	896	1,002	-569	159
50,000 to 75,000	1,817	5,619	8,966	10,413	-68,188	1,597
75,000 to 100,000	846	4,531	5,093	5,310	-2,525	796
100,000 to 200,000	842	3,622	16,697	18,379	6,634	11,464
200,000 and Over	<u>370</u>	4,459	34,310	<u>35,714</u>	10,521	24,550
Total	8,778	32,927	71,215	82,776	-76,985	43,214

SOURCE: Congressional Budget Office tabulations of the 1989 Sales of Capital Assets panel.

TABLE A-20. NOMINAL AND REAL CAPITAL GAINS FOR CORPORATE STOCK ONLY, BY INCOME, 1985

				nal Gains s of dollars)	Real Gains (Millions of dollars)		
	Returns	Transactions	No	Current Law	No	Current Law	
Income	(Thousands)	(Thousands)	Loss Limit	Loss Limit	Loss Limit	Loss Limit	
Less Than 0	74	233	602	900	187	711	
0 to 10,000	541	1,259	798	896	-13	446	
10,000 to 20,000	709	2,163	658	1,037	-1,355	-242	
20,000 to 30,000	840	2,707	677	1,174	-4,639	144	
30,000 to 40,000	672	2,469	1,887	2,930	-1,329	1,260	
40,000 to 50,000	706	2,500	1,789	2,192	-995	936	
50,000 to 75,000	967	4,027	4,467	4,853	936	2,611	
75,000 to 100,000	389	1,866	2,745	2,955	506	1,545	
100,000 to 200,000	357	2,181	7,740	8,213	3,903	5,505	
200,000 and Over	<u>142</u>	1,395	<u>28,335</u>	<u>28,833</u>	<u>23,221</u>	<u>24,980</u>	
Total	5,399	20,801	49,698	53,983	20,421	37,895	

SOURCE: Congressional Budget Office tabulations of the 1985 Sales of Capital Assets file.

TABLE A-21. NOMINAL AND REAL CAPITAL GAINS FOR CORPORATE STOCK ONLY, BY INCOME, 1989

				nal Gains s of dollars)	Real Gains (Millions of dollars)	
	Returns	Transactions	No	Current Law	No	Current Law
Income	(Thousands)	(Thousands)	Loss Limit	Loss Limit	Loss Limit	Loss Limit
Less Than 0	111	323	-99	383	-715	242
0 to 10,000	384	909	84	90	-290	-184
10,000 to 20,000	565	1,213	835	971	-940	-248
20,000 to 30,000	409	972	138	662	-1,909	32
30,000 to 40,000	502	2,726	1,453	1,536	-652	320
40,000 to 50,000	479	1,815	270	306	-107	12
50,000 to 75,000	1,345	3,048	2,209	3,015	-74	1,731
75,000 to 100,000	617	3,458	1,932	2,157	99	879
100,000 to 200,000	557	2,499	1,927	3,186	-746	1,563
200,000 and Over	<u>295</u>	3,149	<u>18,667</u>	<u>19,669</u>	<u>12,405</u>	<u>15,306</u>
Total	5,263	20,113	27,416	31,976	7,072	19,652

SOURCE: Congressional Budget Office tabulations of the 1989 Sales of Capital Assets panel.

TABLE A-22. SHARE OF CAPITAL GAINS AND LOSSES, BY MONTH, 1985 (In percent)

	Taxpayers with Net Capital Loss		T	Taxpayers with Net Capital Gain			All Taxpayers		
	Gain	Loss	Net	Gain	Loss	Net	Gain	Loss	Net
January	12.9	10.8	9.4	9.9	7.0	10.2	10.0	9.3	10.2
February	6.9	4.6	3.1	7.4	4.9	7.6	7.3	4.7	7.9
March	7.3	6.9	6.7	7.8	7.3	7.9	7.8	7.1	8.0
April	7.7	5.1	3.4	6.4	5.8	6.4	6.4	5.4	6.7
May	7.8	5.6	4.2	9.2	5.3	9.5	9.1	5.5	9.9
June	8.1	13.9	17.6	8.7	6.8	8.8	8.7	11.0	8.1
July	7.3	5.5	4.4	8.5	6.2	8.7	8.4	5.8	9.0
August	8.5	4.8	2.4	8.6	6.5	8.8	8.6	5.5	9.3
September	6.2	6.1	6.1	6.6	6.4	6.6	6.6	6.2	6.7
October	6.4	12.2	15.9	9.0	8.3	9.0	8.9	10.7	8.5
November	7.9	5.5	4.0	7.8	10.3	7.6	7.9	7.5	7.9
December	13.0	18.9	22.6	10.1	25.2	8.9	10.2	21.4	<u>7.8</u>
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Memorandum:									
Gains from Transactions with:									
Valid sell month	5,229	13,529	-8,299	122,604	9,084	113,521	127,834	22,612	105,221
Missing or invalid sell month	1,619	7,336	-5,717	61,394	2,343	59,051	63,014	9,679	53,335

SOURCE: Congressional Budget Office tabulations of the 1985 Sales of Capital Assets file.

NOTE: Percentages are based on transactions with a valid sell month. The last row represents the amount of gains with missing or invalid sell months reported.

TABLE A-23. SHARE OF CAPITAL GAINS AND LOSSES, BY MONTH, 1989 (In percent)

	Taxpayers with Net Capital Loss		Taxpayers with Net Capital Gain			All Taxpayers			
	Gain	Loss	Net	Gain	Loss	Net	Gain	Loss	Net
January	5.6	6.7	8.4	10.5	3.5	11.8	10.0	5.2	12.2
February	4.3	4.1	3.9	4.9	3.1	5.2	4.8	3.7	5.3
March	4.4	8.1	14.0	8.9	6.0	9.5	8.5	7.1	9.1
April	3.4	10.0	20.5	7.4	4.1	8.0	6.9	7.3	6.8
May	43.0	3.6	-59.4	8.9	5.0	9.7	12.5	4.3	16.2
June	6.5	8.0	10.4	13.0	4.1	14.7	12.3	6.2	15.1
July	5.0	3.7	1.7	11.4	5.4	12.6	10.7	4.5	13.6
August	6.0	19.9	42.3	13.4	6.9	14.7	12.7	13.9	12.1
September	2.4	5.0	9.1	7.6	15.4	6.1	7.0	9.8	5.8
October	9.9	6.9	2.1	4.2	8.2	3.4	4.8	7.5	3.5
November	6.6	5.4	3.4	4.1	6.9	3.5	4.3	6.1	3.5
December	3.0	18.6	43.7	5.8	31.4	0.9	5.5	24.5	<u>-3.1</u>
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Memorandum:									
Gains from Transactions with:									
Valid sell month	12,880	20,926	-8,046	111,197	17,966	93,231	124,077	38,892	85,185
Missing or invalid sell month	2,727	7,175	-4,448	67,740	2,708	65,032	70,468	9,883	60,585

SOURCE: Congressional Budget Office tabulations of the 1989 Sales of Capital Assets panel.

NOTE: Percentages are based on transactions with a valid sell month. The last row represents the amount of gains with missing or invalid sell months reported.

TABLE A-24. SHARE OF CAPITAL GAINS AND LOSSES, BY MONTH, 1993 (In percent)

	Taxpayers with Net Capital Loss		Taxpayers with Net Capital Gain			All Taxpayers			
	Gain	Loss	Net	Gain	Loss	Net	Gain	Loss	Net
January	7.8	4.3	1.2	8.0	5.6	8.4	8.0	4.9	9.1
February	4.3	5.3	6.1	4.7	5.4	4.6	4.7	5.3	4.4
March	15.7	5.3	-3.7	5.6	4.2	5.8	6.3	4.8	6.8
April	6.5	4.4	2.5	5.3	5.7	5.2	5.4	5.0	5.5
May	5.9	9.2	12.1	5.4	4.9	5.5	5.4	7.1	4.8
June	10.1	6.4	3.2	10.0	5.3	10.8	10.0	5.9	11.6
July	5.6	7.5	9.2	14.6	9.0	15.6	14.0	8.2	16.2
August	6.5	7.6	8.5	6.4	6.3	6.4	6.4	7.0	6.1
September	11.1	6.1	1.8	12.8	6.5	13.8	12.7	6.3	15.1
October	8.6	5.8	3.4	13.8	5.9	15.1	13.4	5.9	16.3
November	6.1	8.4	10.5	7.3	10.6	6.8	7.3	9.5	6.4
December	11.8	<u>29.7</u>	45.3	6.2	30.5	2.1	6.6	30.1	<u>-2.5</u>
Total	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Memorandum:									
Gains from Transactions with:									
Valid sell month	7,782	16,727	-8,945	107,253	15,341	91,912	115,035	32,068	82,967
Missing or invalid sell month	6,113	6,856	-743	54,172	4,747	49,425	60,286	11,603	48,683

SOURCE: Congressional Budget Office tabulations of the 1993 Sales of Capital Assets panel.

NOTE: Percentages are based on transactions with a valid sell month. The last row represents the amount of gains with missing or invalid sell months reported.

TABLE A-25. CAPITAL GAINS FOR ALL TAXPAYERS, BY INCOME AND FILING STATUS, 1993

Income (Dollars) ^a	Returns (Thousands)	Returns with Gains (Thousands)	Percentage of Returns in Income Class with Gains	Percentage of Returns with Gains	Net Capital Gains ^b (Millions of dollars)	Percentage of Gains	Average Capital Gains for Returns with Gains (Dollars)
		Joi	nt Returns				
Less Than 0	610	235	39	2	-5,431	-5	-23,111
0 to 10,000	4,587	683	15	6	186	0	272
10,000 to 20,000	7,320	1,136	16	11	1,797	2	1,582
20,000 to 30,000	7,042	1,154	16	11	2,397	2	2,077
30,000 to 40,000	7,408	1,101	15	10	3,046	3	2,767
40,000 to 50,000	6,478	1,127	17	11	3,211	3	2,849
50,000 to 75,000	9,179	2,355	26	22	8,219	8	3,490
75,000 to 100,000	2,961	1,174	40	11	6,209	6	5,289
100,000 to 200,000	2,114	1,202	57	11	15,261	15	12,696
200,000 and Over	<u>655</u>	523	80	5	67,635	<u>66</u>	129,321
All Returns	48,354	10,690	22	100	102,530	100	9,591
		Nonj	oint Returns	5			
Less Than 0	622	226	36	3	-3,854	-10	-17,053
0 to 10,000	27,627	2,039	7	29	1,207	3	592
10,000 to 20,000	17,324	1,290	7	18	2,495	7	1,934
20,000 to 30,000	10,704	1,084	10	15	2,906	8	2,681
30,000 to 40,000	5,302	854	16	12	2,538	7	2,972
40,000 to 50,000	2,239	513	23	7	2,023	5	3,943
50,000 to 75,000	1,686	589	35	8	3,997	11	6,786
75,000 to 100,000	357	185	52	3	2,208	6	11,935
100,000 to 200,000	291	191	66	3	4,912	13	25,717
200,000 and Over	<u>97</u>	<u>78</u>	80	1	<u>18,875</u>	_51	241,987
All Returns	66,249	7,049	11	100	37,307	100	5,293
		All	Гах Returns				
Less Than 0	1,232	461	37	3	-9,285	-7	-20,141
0 to 10,000	32,214	2,722	8	15	1,393	1	512
10,000 to 20,000	24,644	2,426	10	14	4,292	3	1,769
20,000 to 30,000	17,746	2,238	13	13	5,303	4	2,370
30,000 to 40,000	12,710	1,955	15	11	5,584	4	2,856
40,000 to 50,000	8,717	1,640	19	9	5,234	4	3,191
50,000 to 75,000	10,865	2,944	27	17	12,216	9	4,149
75,000 to 100,000	3,318	1,359	41	8	8,417	6	6,194
100,000 to 200,000	2,405	1,393	58	8	20,173	14	14,482
200,000 and Over	<u>752</u>	<u>601</u>	80	3	86,510	<u>62</u>	143,943
All Returns	114,603	17,739	15	100	139,837	100	7,883

SOURCE: Congressional Budget Office tabulations of the 1993 Statitstics of Income individual income tax return data.

a. Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

b. Net capital gains before carryovers and loss limits.

TABLE A-26. CAPITAL GAINS FOR TAXPAYERS UNDER 65 YEARS OLD, BY INCOME AND FILING STATUS, 1993

Income (Dollars) ^a	Returns (Thousands)	Returns with Gains (Thousands)	Percentage of Returns in Income Class with Gains	Percentage of Returns with Gains	Net Capital Gains ^b (Millions of dollars)	Percentage of Gains	Average Capital Gains for Returns with Gains (Dollars)
		Join	nt Returns ^c				
Less Than 0	421	150	36	2	-3,599	-5	-23,993
0 to 10,000	2,857	278	10	4	62	0	223
10,000 to 20,000	5,015	427	9	5	732	1	1,714
20,000 to 30,000	5,828	698	12	9	1,094	1	1,567
30,000 to 40,000	6,755	805	12	10	1,457	2	1,810
40,000 to 50,000	6,037	900	15	11	1,852	2	2,058
50,000 to 75,000	8,714	2,042	23	26	5,271	7	2,581
75,000 to 100,000	2,809	1,059	38	13	4,395	6	4,150
100,000 to 200,000	1,950	1,065	55	14	10,899	15	10,234
200,000 and Over	<u>585</u>	<u>458</u>	78	6	<u>52,259</u>	<u>70</u>	114,103
All Returns	40,971	7,882	19	100	74,422	100	9,442
		Nonj	oint Returns	i			
Less Than 0	491	154	31	3	-2,541	-11	-16,500
0 to 10,000	24,756	1,398	6	29	1,011	4	723
10,000 to 20,000	15,558	692	4	14	1,189	5	1,718
20,000 to 30,000	10,003	765	8	16	1,580	7	2,065
30,000 to 40,000	4,962	667	13	14	1,317	5	1,975
40,000 to 50,000	2,035	376	18	8	1,029	4	2,737
50,000 to 75,000	1,467	438	30	9	2,242	9	5,119
75,000 to 100,000	308	144	47	3	1,336	6	9,278
100,000 to 200,000	224	134	60	3	2,802	12	20,910
200,000 and Over	<u>78</u>	60	77	_1	14,185	_59	236,417
All Returns	59,882	4,828	8	100	24,150	100	5,002
		All	Γax Returns				
Less Than 0	912	304	33	2	-6,140	-6	-20,197
10,000 to 20,000	27,613	1,676	6	13	1,073	1	640
10,000 to 20,000	20,573	1,119	5	9	1,921	2	1,717
20,000 to 30,000	15,831	1,463	9	12	2,674	3	1,828
30,000 to 40,000	11,717	1,472	13	12	2,774	3	1,885
40,000 to 50,000	8,072	1,276	16	10	2,881	3	2,258
50,000 to 75,000	10,181	2,480	24	20	7,513	8	3,029
75,000 to 100,000	3,117	1,203	39	9	5,731	6	4,764
100,000 to 200,000	2,174	1,199	55	9	13,701	14	11,427
200,000 and Over	663	518	78	4	66,444	<u>67</u>	128,270
All Returns	100,853	12,710	13	100	98,572	100	7,755

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data.

a. Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

b. Net capital gains before carryovers and loss limits.

c. Primary taxpayer under 65 years old.

TABLE A-27. CAPITAL GAINS FOR TAXPAYERS 65 YEARS OLD AND OVER, BY INCOME AND FILING STATUS, 1993

Income (Dollars) ^a	Returns (Thousands)	Returns with Gains (Thousands)	Percentage of Returns in Income Class with Gains	Percentage of Returns with Gains	Net Capital Gains ^b (Millions of dollars)	Percentage of Gains	Average Capital Gains for Returns with Gains (Dollars)
		Join	nt Returns ^c				
Less Than 0	189	86	46	3	-1,833	-7	-21,314
0 to 10,000	1,730	405	23	14	124	0	306
10,000 to 20,000	2,305	708	31	25	1,066	4	1,506
20,000 to 30,000	1,214	456	38	16	1,303	5	2,857
30,000 to 40,000	653	296	45	11	1,589	6	5,368
40,000 to 50,000	441	227	51	8	1,359	5	5,987
50,000 to 75,000	465	313	67	11	2,948	10	9,419
75,000 to 100,000	152	115	76	4	1,814	6	15,774
100,000 to 200,000	164	137	84	5	4,362	16	31,839
200,000 and Over	71	<u>64</u>	90	2	<u>15,375</u>	<u>55</u>	240,234
All Returns	7,384	2,807	38	100	28,107	100	10,013
		Nonj	oint Returns	S			
Less Than 0	131	71	54	3	-1,312	-10	-18,479
0 to 10,000	2,871	640	22	29	195	1	305
10,000 to 20,000	1,766	598	34	27	1,306	10	2,184
20,000 to 30,000	701	319	46	14	1,326	10	4,157
30,000 to 40,000	340	187	55	8	1,220	9	6,524
40,000 to 50,000	204	137	67	6	994	8	7,255
50,000 to 75,000	219	151	69	7	1,755	13	11,623
75,000 to 100,000	49	40	82	2	873	7	21,825
100,000 to 200,000	67	57	85	3	2,110	16	37,018
200,000 and Over	<u>19</u>	18	<u>95</u>	1	4,689	<u>36</u>	260,500
All Returns	6,367	2,218	35	100	13,156	100	5,931
		All	Гах Returns				
Less Than 0	320	157	49	3	-3,145	-8	-20,032
0 to 10,000	4,601	1,045	23	21	319	1	305
10,000 to 20,000	4,071	1,306	32	26	2,372	6	1,816
20,000 to 30,000	1,915	775	40	15	2,629	6	3,392
30,000 to 40,000	993	483	49	10	2,809	7	5,816
40,000 to 50,000	645	364	56	7	2,353	6	6,464
50,000 to 75,000	684	464	68	9	4,703	11	10,136
75,000 to 100,000	201	155	77	3	2,687	7	17,335
100,000 to 200,000	231	194	84	4	6,472	16	33,361
200,000 and Over	90	82	<u>91</u>	2	20,064	<u>49</u>	244,683
All Returns	13,751	5,025	37	100	41,263	100	8,212

SOURCE: Congressional Budget Office tabulations of the 1993 Statistics of Income individual income tax return data.

a. Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

b. Net capital gains before carryovers and loss limits.

c. Primary taxpayer 65 years old and over.

TABLE A-28. CAPITAL GAINS FOR JOINT RETURNS, BY INCOME, 1985, 1989, AND 1993 (In 1993 dollars)

Income (Dollars) ^a	Returns (Thousands)	Returns with Gains (Thousands)	Percentage of Returns in Income Class with Gains	Percentage of Returns with Gains	Net Capital Gains ^b (Millions of dollars)	Percentage of Gains	Average Capital Gains for Returns with Gains (Dollars)
		Joint R	eturns in 19	93			
Less Than 0	610	235	39	2	-5,431	-5	-23,111
0 to 10,000	4,587	683	15	6	186	0	272
10,000 to 20,000	7,320	1,136	16	11	1,797	2	1,582
20,000 to 30,000	7,042	1,154	16	11	2,397	2	2,077
30,000 to 40,000	7,408	1,101	15	10	3,046	3	2,767
40,000 to 50,000	6,478	1,127	17	11	3,211	3	2,849
50,000 to 75,000	9,179	2,355	26	22	8,219	8	3,490
75,000 to 100,000	2,961	1,174	40	11	6,209	6	5,289
100,000 to 200,000	2,114	1,202	57	11	15,261	15	12,696
200,000 and Over	655	523	80	5	67,635	<u>66</u>	129,321
All Returns	48,354	10,690	22	100	102,530	100	9,591
		Joint R	eturns in 19	89			
Less Than 0	466	179	38	2	-5,560	-5	3,184
0 - 10,000	3,726	385	10	4	-80	-0	-208
10,000 to 20,000	6,679	788	12	9	1,164	1	1,477
20,000 to 30,000	6,937	884	13	10	1,672	1	1,891
30,000 to 40,000	7,381	989	13	11	2,318	2	2,344
40,000 to 50,000	6,900	1,025	15	11	2,919	2	2,848
50,000 to 75,000	9,996	2,116	21	23	8,211	7	3,880
75,000 to 100,000	3,257	1,128	35	12	7,420	6	6,578
100,000 to 200,000	2,145	1,124	52	12	17,168	14	15,274
200,000 and Over	689	528	77	<u>6</u>	86,508	<u>71</u>	163,841
All Returns	48,176	9,146	19	100	121,740	100	13,311
		Joint R	eturns in 19	85			
Less Than 0	550	202	37	2	-5,087	-3	2,822
0 to10,000	3,283	270	8	3	51	0	189
10,000 to 20,000	6,486	570	9	7	661	0	1,160
20,000 to 30,000	7,553	882	12	11	1,988	1	2,254
30,000 to 40,000	7,748	894	12	11	2,461	1	2,753
40,000 to 50,000	7,139	981	14	12	3,716	2	3,788
50,000 to 75,000	9,848	1,990	20	24	10,051	6	5,051
75,000 to 100,000	2,898	1,055	36	13	10,748	6	10,188
100,000 to 200,000	1,888	1,115	59	13	28,134	17	25,232
200,000 and Over	531	434	82	5	116,576	<u>69</u>	268,608
All Returns	47,924	8,393	18	100	169,299	100	20,171

SOURCE: Congressional Budget Office tabulations of the 1985, 1989, and 1993 Statistics of Income individual income tax return data.

a. Income includes wages and salaries, interest, dividends, capital gains, pensions, rents, royalties, and business and farm income.

b. Net capital gains before carryovers and loss limits.