AN ANALYSIS OF THE DISTRIBUTION OF INDIVIDUAL INCOME AND TAXES, 1979-2001
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Different approaches have been used to measure the distribution of individual income over time. Survey data have been compiled with comprehensive enumeration, but underreporting of incomes, inadequate coverage at the highest income levels, and omission of a key income type jeopardize the validity of results. Administrative records, such as income tax returns, may be less susceptible to underreporting of income but exclude certain nontaxable income types and can be inconsistent in periods when the tax law has been changed. Record linkage studies have capitalized on the advantages of both approaches, but are costly and severely restricted by the laws governing interagency data sharing.

This paper is the fifth in a series examining trends in the distribution of individual incomes and tax burdens based on a consistent and comprehensive measure of income derived from individual income tax returns. In the previous papers, we demonstrated that the shares of income accounted for by the highest income-size classes clearly have increased over time, and we also demonstrated the superiority of our comprehensive and consistent income measure, the 1979 Retrospective Income Concept, particularly in periods of tax reform.

In this paper, we continue the analysis of individual income and tax distributions, adding for 3 years (1979, 1989, and 1999) social security and Medicare taxes to this analysis. The paper has three sections. In the first section, we briefly summarize this measure of individual income derived as a "retrospective concept" from individual income tax returns. In the second section, we present the results of our analysis of time series data. We conclude with an examination of Gini coefficients computed from these data.

Derivation of the Retrospective Income Concept

The tax laws of the 1980's and 1990's made significant changes to both the tax rates and definitions of taxable income. The tax reforms of 1981 and 1986 significantly lowered individual income tax rates, and the latter also substantially broadened the income tax base. The tax law changes effective for 1991 and 1993 initiated rising individual income tax rates and further modifications to the definition of taxable income. Law changes effective for 1997 substantially lowered the maximum tax rate on capital gains. The newest law changes have lowered marginal rates starting with 2001 and will again lower the maximum tax rate on long-term capital gains, as well as decreasing the maximum rates for most dividends. With all of these changes, the questions that arise are what has happened to the distribution of individual income, the shares of taxes paid, and average taxes by the various income-size classes?

In order to analyze changes in income and taxes over time, consistent definitions of income and taxes must be used. However, the Internal Revenue Code has been substantially changed in the last 23 years--both the concept of taxable income and the tax rate schedules have been significantly altered. The most commonly used income concept available from Federal income tax returns, Adjusted Gross Income (AGI), has changed over time making it difficult to use AGI for intertemporal comparisons of income. For this reason, an income definition that would be both comprehensive and consistent over time was developed. The 1979 Retrospective Income Concept was designed to include the same income and deduction items from items available on Federal individual income tax returns. Tax Years 1979 through 1986 were used as base years to identify the income and deduction items, and the concept was subsequently applied to later years including the same components common to all years.

The calculation of the 1979 Retrospective Income Concept includes several items partially excluded from AGI for the base years, the largest of which was capital gains. The full amounts of all capital gains, as well as all dividends and unemployment compensation, were included in the income calculation. Total pensions, annuities, IRA distributions, and rollovers were added, including nontaxable portions that were excluded from AGI. Social Security benefits were omitted because they were not reported on tax returns until 1984. Also, any depreciation in excess of straight-line depreciation, which was subtracted in computing AGI, was added back. For this study, retrospective income was computed for all individual income tax returns in the annual Statistics of Income (SOI) sample files for the period 1979 through 2001. Loss returns were excluded, and the tax returns were tabulated into income-size classes based on the size of retrospective income and ranked from highest to lowest. Percentile thresholds were estimated or interpolated for income-
size classes ranging from the top 0.1 percent to the bottom 20 percent. For each size class, the number of returns and the amounts of retrospective income and taxes paid were compiled. From these data, income and tax shares and average taxes were computed for each size class for all years.

The Distribution of Income and Taxes

With this database, we sought to answer the following questions--have the distribution of individual incomes (i.e., income shares), the distribution of taxes (i.e., tax shares), and the average effective tax rates (i.e., tax burdens) changed over time? As a first look at the data, we examined the income thresholds of the bottom (or entry level) of each income-size class, and a clear pattern emerged. While all of the income thresholds have increased over time, the largest increases in absolute terms, and on a percentage basis, were with the highest income-size classes.

For example, while $233,539 was needed to enter the top 0.1 percent for 1979, $1,405,770 was needed for entry into this class for 2001. This represents a more than 500-percent increase. Also, while $79,679 of retrospective income was needed to enter the top 1-percent size class for 1979, $323,861 was needed for entry into this size class for 2001, an increase of 306 percent. For the top 20-percentile threshold increased only 159 percent, and, for the bottom 20 percent, the increase was only 124 percent. Since much of these increases are attributable to inflation, we computed constant dollar thresholds, using the Consumer Price Index.

What is most striking about these data are the changes between 1979 and 2001 for the various income-size percentile thresholds (see Figure A). For example, the threshold for the top 0.1 percent grew (using a 1982-1984 base) from $321,679 for 1979 to $793,772 for 2001, an increase of 147 percent. Similarly, the threshold for the taxpayers in the 1-percent group rose from $109,751 for 1979 to $182,869 for 2001, an increase of over 66 percent. However, the thresholds for each lower percentile class show smaller increases in the period; the top 20-percentile threshold increased only 6.1 percent, and the 40-percent and all lower thresholds all declined.

Income shares

The share of income accounted for by the top 1 percent of the income distribution has climbed steadily from a low of 9.58 percent (3.28 for the top 0.1 percent) for 1979 to 18.22 percent (8.13 for the top 0.1 percent) for 2001. While this increase is quite steady, there were some significantly large jumps, particularly for 1986, due to a surge in capital gains realizations after the passage, but before implementation, of the Tax Reform Act of 1986 (TRA). The top 1-percent share also increased for 1996 through 2000, when sales of capital assets also grew considerably each year. Notable declines in the top 1-percent share occurred in the recession years of 1981, 1990-1991, and 2001.

This pattern of an increasing share of total income is mirrored in the 1-to-5 percent class but to a considerably lesser degree. For this group, the income share increased from 12.60 percent to 15.12 percent in this period. The 5-to-10 percent class’s share of income held fairly steady over this period, going from 10.89

Figure A-Constant Dollar Income Thresholds, 1979-2001 (1982-84=100)
percent for 1979 to 11.12 percent for 2001. The shares of the lower percentile-size classes, from the 10-to-20 percent classes to the four lowest quintiles, show declines in shares of total income over the 23-year period (see Figure B).

Tax Shares -- Income Tax
The share of income taxes accounted for by the top 1-percent also climbed steadily in this period, from initially at 19.75 percent (7.38 for the top 0.1 percent) for 1979, then declined to a low of 17.42 percent (6.28 for the top 0.1 percent) for 1981, before rising to 36.30 percent (18.70 for top 0.1 percent) for 2000 (Figure C).

The corresponding percentages for 2000 for the 1-percent and 0.1-percent groups are 37.68 and 19.44 percent, respectively, accounting for the 2000 tax rebate, which is discussed below. For the recession year of 2001 with its large decline in net gains from the sale of capital assets, these shares declined to 32.88 percent for the top 1-percent and 15.78 for the top 0.1-percent group. As with incomes, there were some years with unusually large increases though a common feature for these years was double-digit growth in net capital gains.7,8

The 1-to-5 percent size class exhibited relatively modest change in its share of taxes, increasing from 17.53 percent to 19.62 percent in the period. The 5-to-10 percent class, and all lower income-size classes, had declining shares of total tax.

Average tax rates -- Income Tax

What is most striking about these data is that the levels of the average tax burdens increase with income size in most years (the only exceptions being 1986 for just the two highest groups). The progressive nature of the
individual income tax system is clearly demonstrated.

Despite the fact that the overall average tax rate remained virtually the same for 1979 and 2001, the average rate for all but the very lowest size class actually declined. While this at first appears to be inconsistent, it is clear how this did in fact occur — over time, an increasing proportion of income has shifted to the upper levels of the distribution where it is taxed at higher rates (see Figure D).

As for the tax share data, accounting for the 2000 rebate had a significant effect, lowering the overall average tax rate from 14.85 to 14.28 percent. A combination of lower marginal tax rates, larger child tax credits, and recession caused this rate to decrease to 13.96 percent for 2001.

In examining the average tax data by income size, four distinct periods emerge. First, the average tax rates were generally climbing up to the implementation of the Economic Recovery Tax Act (ERTA) effective for 1982. This was an inflationary period, and, prior to indexing of personal exemptions, the standard deduction, and tax brackets, which caused many taxpayers to face higher tax rates. (Indexing became a permanent part of the tax law for Tax Year 1985.) Also, this period marked the recovery from the recession in the early 1980’s.

Similarly, average taxes also climbed in the period after 1992, the period affected by the Omnibus Budget and Reconciliation Act (OBRA). This was not surprising for the highest income-size classes, ones affected by the OBRA-initiated 39.6-percent top marginal tax rate, but the average tax rate increases are also evident in the smaller income-size classes for most years in the 1993 to 1996 period as well.

For the majority of intervening years (i.e., 1982 through 1992), average tax rates generally declined by small amounts for most income-size classes, although the period surrounding the implementation of the 1986 Tax Reform Act (TRA) gave rise to small increases in some classes. Despite the substantial base broadening and rate lowering initiated by TRA, for most income-size classes, the changes to average rates were fairly small. However, it should be kept in mind that individuals can and do move between income-size classes.

The rates for the top 0.1 percent clearly show the effects of the 1986 capital gains realizations, in anticipation of the ending of the 60-percent long-term gains exclusion, which began in 1987. The average tax rate for this income-size class dropped for 1986, but it rose sharply for 1987, before dropping again for each of the next 3 years.

To assess what happened, it is important to look at the underlying data. The substantial increase in capital gains realizations for 1986 swelled the aggregate income and tax amounts for upper income classes and also raised the income thresholds of these top classes. However, since much of the increase in income for these size classes was from net long-term capital gains, which had a maximum effective tax rate of 20 percent, it is not surprising that the average tax rate for these top size classes declined.

Last, are those years affected by the Taxpayer Relief Act of 1997 (1997 through 2001), where the top rate on
long-term capital gains was reduced significantly from 28 to 20 percent. For 1997, the first year under this law, when the lower rates were only partially in effect, the average tax rate fell for the top 0.1-percent group of taxpayers but increased for all other groups. However, for 1998, the first full year under lower capital gains rates, all groups up to and including the 40-to-60 percent class had reduced average tax rates (while the lowest two quintiles had virtually the same average tax rates). For all groups (except for the 20-40 and the 60-to-80 percent groups in 1999), the average rates returned to increasing for both 1999 and 2000.

The Economic Growth and Tax Relief Reconciliation Act of 2001 (EGTRRA) further reduced marginal tax rates over several years. One of these reductions was an introduction of a 10-percent bracket on the first $6,000 ($12,000 if married filing a joint return) of taxable income. In an attempt to fuel a recovery from recession, this reduction was introduced retroactively in the form of a rebate based on Tax Year 2000 filings. Therefore, we simulated the rebate on the Tax Year 2000 Individual File to see its effects on average tax rates. When the rebate is taken into account, the average rates for 2000 decreased for all groups, except for the top 0.1 and the 1-to-5 percent, reversing the pre-rebate increases. Tax Year 2001 was a mixture of increases and decreases in average tax rates by income group. Most groups paid higher average taxes; however, the 1-to-5 and 5-to-10 percent groups paid lower average taxes along with the bottom 20-percent group.

**Tax shares – Income Plus Social Security Tax**

For individual taxpayers, social security taxes compose a fairly large portion (about 37 percent for 1999) of the Federal tax burden.14 To broaden our analysis, we merged data from W-2’s with individual income tax records for the years 1979, 1989, and 1999. Total social security taxes included self-employment taxes and taxes on tips reported on tax returns and two times the social security taxes (representing both the taxpayers’ and the employers’ shares) reported on W-2’s. The employers’ share of this tax was added into retrospective income, as well. To further help our analysis, the U.S. Treasury Department’s Office of Tax Analysis (OTA) model was used to simulate the effect of the two new tax laws (EGTRRA) and the Jobs and Growth Tax Relief Reconciliation Act of 2003 (JGTRRA), on the 1999 data.15

Even including social security taxes, the shares of the higher income groups increased (the top 0.1-percent group’s share more than doubled from 5.06 percent for 1979 to 11.05 percent for 1999), while the shares of the lower income groups (each group from the 10-to-20 percent group and lower) declined (see Figure E). However, when we simulated all of the provisions of EGTRRA/JGTRRA on 1999 data, tax shares for the top two groups (the 0.1 and the 0.1-to-1 percent groups) declined from 1999 levels, while all other groups increased. Still, for these two groups and the 1-to-5 percent, the tax shares were still higher than 1989 levels. Interestingly, the 1-to-5 percent group is the only group whose share increased from 1989 to 1999 (from 15.42 to 16.84 percent) and then increases again (to 17.85 percent) under new tax law provisions. This is most likely due to the effect of the alternative minimum tax (AMT) offsetting lower marginal and capital gain rates for this group of taxpayers.

**Average Tax Rates Including Social Security Taxes**

Unlike the tax shares data, average taxes, including social security taxes, vary considerably over time from average income taxes. Including social security taxes for 1979, the overall tax system (like the income tax system) was progressive, with each higher income class paying a higher percentage average tax than the classes preceding them (see Figure F). However, this is not entirely true for any of the other years that we merged
income tax with W-2 data. For 1989, the system was progressive up to the 5-to-10 percent income class. 

Above this level, each successively higher income class paid a lower rate than the ones below them, falling to 23.33 percent for the top 0.1-percent income group. In fact, for 1989 the top 0.1-percent group faced a lower rate than all groups from the 10-to-20 percent income group and higher. The highest rate for that year was paid by those individuals in the 5-to-10 percent income group at 25.09 percent, 1.76 percentage points higher than those in the 0.1-percent group.

In contrast, the 5-to-10 percent group paid an average tax of 22.59 percent in 1979, 9.33 percentage points lower than the 0.1-percent group. The increase in social security taxes for 1979, wage earners and their employers paid a combined rate of 8.1 percent in social security taxes on earnings up to $22,900. By 1989, this had increased to 13.02 percent on earned income up to $48,000. Furthermore, for 1999, for any earned income above the $72,600 maximum, the employee and employer continued to pay Medicare taxes at a combined rate of 2.9 percent.

Despite this rise in social security taxes, 1999 combined average taxes returned to a mostly progressive system. The only exception to this progressive tax structure was the 5-to-10 percent income group, who paid higher average taxes at 26.18 percent than the 1-to-5 percent income group at 25.97 percent. However, the 0.1-to-1 percent and the 0.1-percent income groups paid the highest average taxes at 26.70 and 27.51 percent.

When we simulated the provisions of the two new tax laws (EGTRRA and JGTRRA) on 1999 data (without allowing for the sunset provisions), the overall tax system returned to a system looking more like 1989 than 1999. Under the simulation, average tax rates continue to increase until the 1-to-5 percent income class (who pay the highest average tax at 25.76 percent). From there, average taxes fall to 23.34 percent for the 0.1-to-1 percent income group and decline further to 22.57 percent for the 0.1-percent income group. Both of these groups would pay a lower average tax than individuals in the 10-to-20 percent income class. The highest income group winds up paying an average tax that is less than all of the groups above the 20-to-40 percent class. Under the new laws, the 0.1-percent group would pay average taxes that are 3.19 percentage points less than the 1-to-5 percent income group, 2.91 percentage points less than the 5-to-10 percent income group, and 1.24 less than the individuals in the 10-to-20 percent group. In fact, under the provisions of EGTRRA/JGTRRA, the individuals in the 0.1-percent group wind up paying less than one percentage point (0.99) more than the 20-to-40 percent income group. In contrast, the highest income group paid average combined taxes of 12.03 percentage points higher than the 20-to-40 percent income group in 1979 and 4.29 percentage points higher than this group under existing 1999 laws.

**Analysis of Gini Coefficients**

To further analyze the data, we estimated Lorenz curves and computed Gini coefficients for all years. The Lorenz curve is a cumulative aggregation of income from lowest to highest, expressed on a percentage basis. To construct the Lorenz curves, we reordered the percentile classes from lowest to highest and used the income thresholds as “plotting points” to fit a series of regression equations for each income-size interval in the 23 years, both before- and after-taxes.

Once the Lorenz curves were estimated for all years, Gini coefficients were calculated for all 23 years for before- and after-tax and are presented in Figure G.

**Figure G-Gini Coefficients for Retrospective Income, Before and After Taxes, 1979 – 2001**

<table>
<thead>
<tr>
<th>Year</th>
<th>Gini Before Tax</th>
<th>Gini After Tax</th>
<th>Difference</th>
<th>Percent Difference</th>
</tr>
</thead>
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<td>0.030</td>
<td>6.3</td>
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<td>1980</td>
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<td>1981</td>
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<td>0.528</td>
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The Gini coefficient, which is a measure of the degree of inequality, generally increased throughout the 23-year period signifying rising levels of inequality for both the pre- and post-tax distributions. This result was not unexpected since it parallels the rising shares of income accruing to the highest income-size classes. Over this period, the before-tax Gini coefficient value increased from 0.469 for 1979 to 0.588 (25.4 percent) for 2000, while the after-tax Gini value increased from 0.439 to 0.558 for a slightly higher percentage increase (25.5 percent). The recession in 2001 actually decreased the levels of inequality to 0.564 (pre-tax) and 0.534 (after-tax).

So what has been the effect of the Federal tax system on the size and change over time of the Gini coefficient values? One way to answer this question is to compare the before- and after-tax Gini values. Looking at this comparison, two conclusions are clear. First, Federal income taxation decreases the Gini coefficients for all years. This is not surprising in that the tax rate structure is progressive, with average rates rising with higher incomes—so, after-tax income is more evenly distributed than before-tax income. A second question is whether the relationship between the before-tax and after-tax Gini coefficient values has changed over time. From G, the after-tax series closely parallels the before-tax series, with reductions in the value of the Gini coefficient ranging from 0.024 to 0.032. The largest differences, which denote the largest redistributive effect of the Federal tax system, have generally been in the periods of relatively high marginal tax rates, particularly 1979-81 and for 1993 and later years. In fact, simulating the tax rebate for Tax Year 2000 results in the largest difference (0.032) over all the years. If this were the only change in marginal rates of the new tax law (EGTRRA), the results would be to increase the redistributive effects of Federal taxes. However, for Tax Year 2001 and beyond, the marginal rates of higher income classes will also be reduced over time until the highest rate will be reduced from its current value of 39.6 percent to 35 percent for 2003. The effects of the new tax laws (EGTRRA / JGTRRA) can be seen in Figure H. This figure illustrates Gini values before and after taxes when including social security taxes with income taxes. The new law decreases the difference between before- and after-tax Gini values for 1999 from 0.025 to 0.022.

To investigate further, the percentage differences between before- and after-tax Gini values were computed and are shown as the fourth column in Figure G. These percentage changes in the Gini coefficient values, a “redistributive effect,” show a decline ranging from 4.5 to 6.5 percent. As for the differences, the largest percentage changes are for the earliest and years, a period when the marginal tax rates were high. The largest percentage reduction was for 1980, but the size of the reduction generally declined until 1986, fluctuated at relatively low levels between 1986 and 1992, and then increased from 1993 to 1996. However, coinciding with the capital gains tax reduction for 1997, the percentage change again declined for 1997 and 1998. Nevertheless, it increased for 1999, 2000 and 2001 (although the 2001 percentage increased slightly if the rebate is included with the 2000 data).

Figure H shows the Gini coefficients for before and after tax (including social security taxes) for 1979, 1989, 1999, and 1999 incorporating the new tax laws. The differences between before and after tax are much smaller than for the income tax, ranging from 0.018 for 1989 to 0.025 for 1979. This results in percentage differences of 3.4 percent to 5.4 percent. In all years, except 1999, the after-tax Gini coefficients are somewhat higher than those that result from simply including income taxes.

So what does this all mean? First, the high marginal tax rates prior to 1982 appear to have had a significant redistributive effect. But, beginning with the tax rate reductions for 1982, this redistributive effect began to decline up to the period immediately prior to TRA 1986. Although TRA became effective for 1987, a surge in late 1986 capital gains realizations (to take advantage of the 60-percent long-term capital gains

<table>
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<tr>
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<td>1999 JGTRRA</td>
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exclusion) effectively lowered the average tax rate for the highest income groups thereby lessening the redistributive effect.

For the post-TRA period, the redistributive effect was relatively low, and it did not begin to increase until the initiation of the 39.6-percent tax bracket for 1993. But since 1997, with continuation of the 39.6-percent rate but with a lowering of the maximum tax rate on capital gains, the redistributive effect again declined. It appears that the new tax laws will continue this trend.

Notes


7 Internal Revenue Service, Statistics of Income—Individual Income Tax Returns, Publication 1304, (selected years).


9 For the years 1979 through 1992, the percentile threshold size classes were estimated by osculatory interpolation as described in Oh and Oh and Scheuren. In this procedure, the data were tabulated into size classes and the percentile thresholds were interpolated. For 1993 through 2000, the SOI individual tax return data files were sorted from highest to lowest, and the percentile thresholds were determined by cumulating records from the top down.


12 The CPI-U from the U.S. Department of Labor, Monthly Labor Review, was used for deflation of the income thresholds.

13 Taxes, taxes paid, tax liabilities, tax shares, and average or effective tax rates are based on income tax, defined as income tax after credits plus alternative minimum tax (AMT) less the nonrefundable portion of the earned income credit (for 2000 and 2001, AMT was included in income tax after credits). However, for Figure F, tax includes social security and Medicare taxes less all of the earned income credit and refundable child credit.

14 Internal Revenue Service, Data Book 1999. – Publication 55B. Total Individual Income Taxes collected from withholding and additional taxes paid with tax forms filed were $1,102.2 billion, while total social security taxes were $587.5 billion.

15 Actually, the OTA model was computed on 1998 individual income tax data and programmed to take all aspects of JGTRRA into account under the assumption that all of the sunset provisions will remain in place. After the results were calculated, the data were increased to 1999 levels. Therefore, income is exactly the same as the rest of the 1999 data, and only the taxes paid differs.

16 A comparison of the before- and after-tax Gini coefficients does not exclusively measure the effects of the tax system in that the tax laws can also affect before-tax income. For example, capital gain realizations have been shown to be sensitive to the tax rates.