

**DISCLOSURE REPORT FOR PUBLIC INSPECTION  
PURSUANT TO INTERNAL REVENUE  
CODE SECTION 6103(p)(3)(C)  
FOR CALENDAR YEAR 2013**

Prepared by the  
INTERNAL REVENUE SERVICE

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## INTRODUCTION

Section 6103(p)(3)(C) of the Internal Revenue Code provides that the Secretary of the Treasury shall, within 90 days after the close of each calendar year, furnish to the Joint Committee on Taxation for disclosure to the public a report which provides, with respect to each Federal agency and certain other entities, the number of: (1) requests for disclosure of returns and return information (as such terms are defined in section 6103(b)); (2) instances in which returns and return information were disclosed pursuant to such requests or otherwise; and (3) taxpayers whose returns, or return information with respect to whom, were disclosed pursuant to such requests.<sup>1</sup> In addition, the report must describe the general purposes for which such requests were made.

Pursuant to section 6103(p)(3)(C), the Internal Revenue Service (“IRS”) prepared a disclosure report for public inspection covering calendar year 2013. The IRS also provided certain supplemental information regarding the disclosure report for calendar years 2011 and 2012. The disclosure report for calendar year 2011 incorrectly combined disclosures made to Treasury’s Office of Economic Policy (“OEP”) of 4,638,863 with disclosures made to the Congressional Budget Office (“CBO”) of 4,638,863, and therefore, the entry for CBO mistakenly reflected a total of 9,277,726. This total should have been separated out between the two agencies in the report for calendar year 2011. For calendar year 2012, the IRS stated that disclosures made to OEP were inadvertently omitted from the report, and the information disclosed to OEP in calendar year 2012 represents the same information SSA disclosed to OEP in 2011. All of the foregoing disclosures were made pursuant to section 6103(p)(2)(B) and the Treasury regulations thereunder.<sup>2</sup>

This document sets forth the report of the Internal Revenue Service.<sup>3</sup>

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<sup>1</sup> Unless otherwise stated, all section references are to the Internal Revenue Code of 1986, as amended.

<sup>2</sup> Treas. Reg. sec. 301.6103(p)(2)(B)-1 (relating to disclosure of returns and return information by agencies other than the IRS).

<sup>3</sup> This document may be cited as follows: Joint Committee on Taxation, *Disclosure Report for Public Inspection Pursuant to Internal Revenue Code Section 6103(p)(3)(C) for Calendar Year 2013* (JCX-52-14), May 22, 2014. This document also is available at [www.jct.gov](http://www.jct.gov).

**Disclosure Report for Public Inspection  
Pursuant to 26 USC Section 6103(p)(3)(C)**

**Internal Revenue Service**

**Calendar Year 2013**

**Calendar Year 2013 Volume of Disclosures of Tax Returns and/or Return Information  
Required to be Accounted for Pursuant to 26 U.S.C. sec. 6103(p)(3)(A)**

<b>Disclosure To/For</b>	<b>IRC Section 6103 Subsection</b>	<b>Bulk Master File Data</b>	<b>Other Disclosures<sup>(1)</sup></b>	<b>Total Number of Disclosures<sup>(2)</sup></b>
Tax Checks	(c)	0	9,300	9,300
States	(d)	6,743,076,805	568,496,112	7,311,572,917
Congressional Committees and/or their agents (including GAO)	(f)	0	10,595,383,081	10,595,383,081
President and Head of Agencies	(g)	0	0	0
Department of Justice	(h)(2)	0	135	135
US Attorneys	(i)(1)		33,923	33,923
DEA			0	0
FBI			0	0
Other			0	0
US Attorneys	(i)(2)	0	173	173
FBI	(i)(3)(A)	0	9	9
FBI	(i)(3)(B)		117	117
Other	(i)(3)(C)		0	0
Other	(i)(7)(A)	0	25	25
Other	(i)(7)(B)	0	0	0
US Attorneys	(i)(7)(C)	0	0	0
Government Accountability Office	(i)(8)	0	1,434	1,434
Bureau of Census	(j)(1)(A)	1,249,585,241	2,362,722	1,251,947,963
Bureau of Economic Analysis	(j)(1)(B)	28,552,289		28,552,289
Office of Economic Policy	(j)(3)	0	4,691,923	4,691,923
Department of Agriculture	(j)(5)	2,471,226	0	2,471,226
Congressional Budget Office	(j)(6)	0	4,691,923	4,691,923
Foreign Countries Tax Treaty Authority	(k)(4)	0	3,479	3,479
Bureau of Prisons (Federal and State)	(k)(10)	0	0	0
Department of Labor Pension Benefit Guaranty Corporation	(l)(2)		1,723	1,723
Federal Agencies	(l)(3)	0	1	1
Department of Treasury Employees	(l)(4)(A)	0	170	170
Child Support Enforcement Agencies	(l)(6)	24,035,986	0	24,035,986
Medicare Premium Subsidy Adjustment	(l)(20)	41,466,018	0	41,466,018
Affordable Care Act	(1)(21)	9,145,639	0	9,145,639
States IRC Section 6104(c)		0	11,793	11,793
<b>TOTALS</b>		<b>8,098,333,204</b>	<b>11,175,688,043</b>	<b>19,274,021,247</b>

- (1) Other Disclosures – Disclosures made by furnishing transcripts of records, permitting inspection of records, furnishing photocopies of records, oral disclosures, and disclosures by means of correspondence without furnishing a copy of the record. Also includes disclosures from locally automated files, which are disclosures tabulated from computer applications or systems separate from the bulk master file.
- (2) Disclosure Counts – Counting the number of disclosures of tax information depends on the type of record disclosed and what constitutes a record subject to disclosure accounting. Generally, when some part of one taxpayer’s record is disclosed for one tax year or period, the IRS counts that as one disclosure. For example, if a return transcript is disclosed to a State tax agency, the IRS counts one disclosure for every tax year each time a transcript is disclosed. If the agency receives a transcript for two tax years, that is counted as two disclosures. If the agency receives three different transcripts for the same taxpayer and tax year, that is counted as three disclosures since each transcript is a separate record.

Bulk Master File Data disclosures are generated when an agency receives data from a database extract of taxpayer information. Each extract contains different data elements of a taxpayer’s account information based on the nature and purpose of the specific extract. A block of data elements on one taxpayer for one year constitutes one record and would be counted as one disclosure. In order to properly track any disclosure, the taxpayer’s identity information (taxpayer’s name, identification number and/or address) is included in every extract record. Other data specific to that extract is included in the record depending on the extract. Each record, regardless of amount of data elements constitutes one disclosure. Examples of varying data elements within a record include, for example; income, specific line items (or unique combinations of line items) from a tax return, account transactions (payments, assessments, refunds, adjustments) math and audit adjustments, filing dates and other filing activities such as extensions, filing status and exemptions. Each tax year or period disclosed for each record is counted as one disclosure.

Other disclosures that are not bulk/extract disclosures also vary depending on what is included in the record. Examples include copies of examination or collection administrative files. When some or all of the contents of an administrative file are disclosed, the IRS counts the number of disclosures based on the number of taxpayers and tax years or periods contained within that file.

**Explanation of Internal Revenue Code Section 6103**  
**(General Purpose for Disclosure)**

<b><u>IRC Section 6103 Subsection</u></b>	<b><u>Purpose of Disclosure</u></b>
(c)	Disclosure of returns and return information to the designee of the taxpayer.
(d)	Disclosure to State tax officials having responsibility for administering State tax law.
(f)	Disclosure to Committees of Congress or their agents (including Government Accountability Office (GAO)).
(g)	Disclosure of returns and return information of any taxpayer by request of the President, or for return information of taxpayers considered for appointment to the executive or judicial branches by the President or head of any Federal agency.
(h)(2)	Disclosure of returns and return information to the Department of Justice in a tax administrative manner for use in, or preparing for any proceeding or investigation before a Federal Grand Jury, Federal or State court, pursuant to a written request by the Attorney General, Deputy or Assistant Attorney General.
(i)(1)	Disclosure of returns or return information to Federal officers or employees upon the grant of an ex parte order by a Federal district court judge or magistrate for use in Federal non-tax criminal investigations.
(i)(2)	Disclosure of return information other than taxpayer return information to Federal officers or employees for use in Federal non-tax criminal investigations, upon request by the head of the agency or Inspector General thereof (or designated officials of the Department of Justice).
(i)(3)(A)	Disclosure of return information other than taxpayer return information to apprise appropriate Federal officials of potential violations of Federal criminal law.
(i)(3)(B)	Disclosure of return information in situations involving the imminent threat of death or physical injury to any individual. Disclosure is made to Federal or State law enforcement. Also includes disclosure to Federal law enforcement in situations involving flight from Federal prosecution.

**IRC Section 6103 Subsection**      **Purpose of Disclosure**

- (i)(3)(C) Disclosure of return information other than taxpayer return information in situations that may be related to a terrorist incident, threat, or activity.
- (i)(7)(A) Disclosure of return information other than taxpayer return information to officers and employees of any Federal law enforcement agency personally and directly engaged in the response to or investigation of any terrorist incident, threat, or activity.
- (i)(7)(B) Disclosure of other than taxpayer return information to Federal agencies engaged in the collection or analysis of intelligence and counterintelligence information or investigation concerning any terrorist incident, threat, or activity upon receipt of a valid written request by the Secretary.
- (i)(7)(C) Disclosure to a Federal law enforcement or Federal intelligence agency engaged in any investigation, response to, or analysis of information concerning a terrorist incident, threat, or activity upon grant of an ex parte court order by a Federal district court judge or magistrate.
- (i)(8) Disclosure to the Government Accountability Office for making audits of the Internal Revenue Service.
- (j)(l)(A) Disclosure of return information to the Bureau of the Census in activities allowed by law.
- (j)(l)(B) Disclosure to Department of Commerce of corporation information for statistical use by the Bureau of Economic Analysis in activities allowed by law.
- (j)(3) Disclosure of Social Security data extracts of individual Social Security earnings and benefits for use in preparing economic or financial forecasts, projections, analyses, and statistical studies.
- (j)(5) Disclosure of return information to the Department of Agriculture for structuring, preparing, and conducting the Census of Agriculture as allowed by law.
- (j)(6) Disclosure to the Congressional Budget Office for long-term modeling of the Social Security and Medicare programs.
- (k)(4) Disclosure of returns or return information to the competent authority of a foreign government that has a tax convention or bilateral information exchange agreement with the United States.

**IRC Section 6103 Subsection**      **Purpose of Disclosure**

- (k)(10)      Disclosure of return information to the Federal Bureau of Prisons or any State agency charged with administration of State prisons to the extent the IRS determines an incarcerated individual filed or facilitated in filing a false return.
- (l)(2)      Disclosure of returns and return information to the Department of Labor and Pension Benefit Guaranty Corporation for administration of Titles I and IV of the Employee Retirement Income Security Act of 1974.
- (l)(3)      Disclosure of tax delinquent account indicator to Federal agencies to determine credit worthiness of a Federal loan applicant.
- (l)(4)(A)      Disclosure of returns and return information for the use in personnel or claimant representative matters by employees of the Department of the Treasury or practitioners who are the subject of such matters, or their representatives.
- (l)(6)      Disclosure of return information to Federal, State, and local child support enforcement agencies for use in establishing and collecting child support obligations from and locating individuals owing such obligations.
- (l)(20)      Disclosure of return information to the Commissioner of Social Security for use in establishing the appropriate amount of any Medicare part B premium adjustment under section 1839 of the Social Security Act.
- (l)(21)      Disclosure of return information to the Secretary of Health and Human Services for use in determining any premium tax credit, cost-sharing reduction, eligibility for participation in a State's Medicaid program covered by the Patient Protection and Affordable Care Act.

**IRC Section 6104 Subsection**      **Purpose of Disclosure**

- (c)      Disclosure to appropriate State officers of certain information pertaining to charitable organizations.