

How Taxing Is Tax Filing? Using Revealed Preferences to Estimate Compliance Costs.

Youssef Benzarti*
UCLA and NBER

Abstract

This paper uses a quasi-experimental design to estimate the cost of filing taxes. Using US tax returns, I observe how taxpayers choose between itemizing deductions and claiming the standard deduction. Taxpayers forgo large tax savings to avoid compliance costs, which provides a revealed preference estimate of such costs. I show that costs increase with income, consistent with an opportunity cost of time explanation. These estimates suggest substantial costs of filing federal income taxes, significantly larger than previously estimated using surveys.

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Income taxes represent the largest source of tax revenue in the United States. Today, 8.8% of GDP is transferred from individuals to the Federal Government through income taxes. While an extensive literature documents the efficiency cost of taxation, we know less about the cost of collecting taxes. But every year, 140 million taxpayers spend numerous hours gathering receipts and statements, filling out various tax schedules and forms and submitting them to the Internal Revenue Service (IRS). A large literature documents that individuals frequently leave “money on the table” in other domains because of transactional costs, which suggests that the compliance costs of taxation are likely to be very large.¹

This paper provides the first estimate of this cost using quasi-experimental methods. I exploit the fact that taxpayers can choose between itemizing their tax deductions or claiming the standard deduction. Itemizing deductions requires some effort cost but can provide significant tax savings. Claiming the standard deduction saves time and effort but results in more taxes due.

With compliance costs, itemizing is beneficial only if it reduces the tax bill by more than the cost of itemizing. This implies that if compliance costs are non-zero, some taxpayers will claim the standard deduction, even though the sum of their deductions exceeds the amount of the standard deduction. The main identification challenge is to differentiate individuals who choose not to itemize because of compliance costs from those who claim the standard deduction because their total deductions are smaller than the standard deduction. This is particularly difficult because taxpayers who claim the standard deduction are not required to report their deductions, implying that their true level of deductions is not observable in the tax data. To identify the cost of itemizing, I proceed in the following way. If individuals forgo tax benefits because of compliance costs, there should be a missing mass in the density of deductions just above the standard deduction threshold. I test this hypothesis by graphing the density of deductions for the years 1980 to 2006 using a stratified random sample of US tax returns, weighted to be representative of the population of itemizers. The shape of the density function suggests the presence of a missing mass just above the standard deduction.

¹See, for example, Currie (2006), Bertrand et al. (2006) and, more recently, Bhargava and Manoli (2015).

To confirm that this shape is due to taxpayers responding to the standard deduction, I turn to a quasi-experimental design. Following a large increase in the standard deduction, I observe a drop in the mass of itemizers just above the post-reform standard deduction threshold. The post-reform density is systematically lower than the pre-reform density just above the post-reform standard deduction threshold, and the two densities overlap further away from the standard deduction. I ensure that no other reforms are affecting the densities of itemized deductions.² I use the missing mass to construct the distribution of forgone benefits. While related to bunching estimators, my approach is different: bunching estimators rely on one cross-section of data, while my approach compares two cross-sections before and after a reform.³

I find that the cost of itemizing ranges from 0.6% to 0.8% of adjusted gross income (AGI), i.e., the disutility derived from itemizing is equivalent to working 10 to 15 hours, which is substantially larger than previous estimates. If individuals switch to the standard deduction because they value their time more than the benefits they can derive from itemizing, richer households should forgo more tax benefits than poorer ones. To test this hypothesis, I break down individuals by income deciles and use the procedure outlined above on each subgroup. The results show an increasing relationship between forgone benefits and income - while controlling for marginal tax rates - consistent with the hypothesis that tax filing imposes a higher cost on richer individuals because they have a higher marginal time value.

The missing mass just above the standard deduction is consistent with taxpayers forgoing benefits to avoid the cost of itemizing. However, there are three alternative explanations for the missing mass. The first is that the standard deduction acts as a concave kink point, effectively changing the price of a deduction. Behavioral responses to concave kink points predict that taxpayers will respond to variations in marginal tax rates but should not respond to variations in income while holding marginal tax rates fixed. The fact that forgone ben-

²My estimates are not affected by the Alternative Minimum Tax, variation in marginal tax rates and the phase out of the personal interest deduction in 1987.

³My approach is related in spirit to a difference-in-differences approach where the treatment group includes taxpayers just above the standard deduction threshold and the control group are individuals far above the standard deduction threshold.

efits increase with income - while controlling for marginal tax rates - supports the compliance costs explanation. A second alternative explanation is that some taxpayers mistakenly believe that IRS audits are more likely when itemizing and, thus, switch to the standard deduction to avoid the expected cost of an audit. To assess this explanation, I conduct a survey of taxpayers to elicit their beliefs about audit probabilities and audit costs. The perceived expected cost of audits would explain, at most, one fifth of the cost. A third alternative explanation is that the uncertainty that taxpayers face over the amount of deductions they can claim drives them to not itemize. The cost that I estimate is based on taxpayers who itemized the year before the reform; their deductions are stable over time, which implies that taxpayers should have a small uncertainty range over their level of total deductions. I show that for this theory to explain the result, the uncertainty range would need to be extremely large ($\pm\$14,000$).

I use the cost of itemizing to estimate the total cost of filing federal income taxes.⁴ I find that total filing costs are significantly larger than previously estimated from surveys.⁵ I also find that the number of forms and record keeping taxpayers have to handle has been steadily increasing since the mid-1980's. Along with the ever increasing complexity of the tax code – growing from 26,300 pages in 1984 to 74,608 in 2016 – the increase in compliance costs call for a much needed simplification of the tax code.

This paper is related to several lines of prior work. It is the first and only paper to provide estimates of the cost of filing taxes using a quasi-experimental design. The most closely related paper is Pitt and Slemrod (1989): estimating the cost of itemizing using a censored model with unobserved censoring thresholds using maximum likelihood, they find a smaller cost of itemizing of \$107, which is equivalent to 0.12% of AGI and is 5 to 7 times smaller than my cost estimates. They use estimators from Gronau (1973) and Nelson (1977) to address the fact that the distribution below the standard deduction is unobservable. While our approaches are related, my method is able to provide a reduced-form demonstration of the existence of compliance costs without relying on a structural model.

⁴Filing costs include both the cost of filling out forms, record keeping, learning about the law and sending documents to the IRS.

⁵See Slemrod (1989) for an example of a survey-based estimate of compliance costs. Other similar references are listed in Table I.8.

Understanding why their structural estimation yields significantly smaller estimates is an important question left for future research. I discuss their approach and some of their assumptions in more detail in Appendix section A.⁶ There is also a literature that uses survey evidence to estimate compliance costs. Although informative of the time spent filing taxes, it does not capture the preferences of taxpayers and, in particular, any disutility of filing taxes.⁷

Finally, this paper adds to a long tradition in public economics emphasizing the need to screen out applicants using ordeal mechanisms (Nichols and Zeckhauser (1982)). If poorer individuals value their time less, then such policies can successfully target them by screening out richer individuals. My results lend support to this assumption because richer individuals tend to forgo more benefits than poorer ones. However, given how large costs are, such policies could be screening out too many individuals.

1 Data and Institutional Background

1.1 Institutional Background

Taxpayers can reduce their taxable income by choosing to itemize their deductions or claiming the standard deduction. The decision to itemize deductions requires comparing two numbers: the sum of itemized deductions and the standard deduction amount. Itemizing, however, is more costly: taxpayers need to keep a record of all the expenses they want to deduct and file Schedule A. Approximately two thirds of the population claim the standard deduction. The standard deduction varies by filing status and by whether the person is blind or older than 65.

Taxpayers itemize four main deductions: (1) state and local income taxes, (2) mortgage interest, (3) real estate taxes and (4) charitable donations. They represent 17%, 40%, 14% and 12% of total deductions, respectively.

Schedule A is a one-page schedule and is relatively easy to fill out as it only requires copying numbers from receipts and statements and then summing them up. Record-keeping is more time consuming since it requires archiving various

⁶This paper is also related to a literature that estimates the effect of tax simplicity on individual and firm behavior. See for example Abeler and Jäger (2015) and more recently Harju et al. (2017) and Aghion et al. (2017).

⁷See Slemrod and Sorum (1984) and Slemrod (1989).

records of expenses.

1.2 Data

I use the the Statistics of Income (SOI) dataset. It consists of repeated annual cross-sections of individual tax returns. The number of observation per year ranges from 80,000 to 200,000. The repeated cross-sections are stratified random samples in which the randomization occurs over the Social Security number. The data oversamples high-income taxpayers and taxpayers with business income, but the IRS provides weights that are used in this analysis to produce estimates representative of the total US population. All of the analysis in this paper uses these weights to reflect population averages. No particular sample restrictions are made, except for properly assigning individuals to filing types (single, joint etc.) and marginal tax brackets (details in Appendix section D). In both cases, I rely on the information provided in tax returns.

2 Missing Mass

If some taxpayers are claiming the standard deduction when the sum of their itemized deductions is greater than the standard deduction, there should be a missing mass just above the standard deduction threshold. I graph the density of deductions for several years in Figure 1 (the remaining 27 years are shown in Appendix Figures H.5-H.9).⁸ The bin closest to the standard deduction includes only those itemizers whose deductions are strictly larger than the standard deduction. The density is systematically low just above the standard deduction and then increases and peaks two to three bins away. This is true across all years from 1980 to 2006 and for all filing statuses. Since I cannot observe the distribution of itemizers below the standard deduction, this cross-sectional evidence is only suggestive.⁹

To prove that the missing mass is a distortion due to the standard deduction, I turn to a quasi-experimental design. There were four large increases in the standard deduction amounts since 1960. These changes occurred in 1971, 1975, 1988 and 2003. I use the 1988 reform to estimate the cost of itemizing because other changes occurred at the same time as the 1971, 1975 and 2003 reforms.

⁸All dollar amounts are in 2016 dollars in the rest of the paper.

⁹Appendix Figure H.17 shows different alternative scenarios that could create a missing mass.

The 2003 reform is likely to provide a lower bound on the cost of itemizing since there were changes in marginal tax rates and deduction rules that made it more attractive to itemize. In 1971 and 1975, there were changes to the parallel standard deduction system.¹⁰ Although the magnitudes of the estimated costs for the 1971, 1975 and 2003 reforms are inaccurate, they still provide reduced-form evidence of the *existence* of compliance costs.

I compare the pre-1988 reform year to the post-reform year to account for lagged behavioral responses. Figures 2a and 2b graph the density of deductions in pre- and post-reform years for the 1988 reform.¹¹ The shape of the distribution in year $t+1$ mirrors that of years t and $t-1$ and the missing mass precisely follows the new standard deduction threshold. This shows that some itemizers switch to the standard deduction once it is increased, even though their deductions are larger than the standard deduction.

The fact that the missing mass closely follows the standard deduction establishes that there is a discontinuity in the distribution *caused* by the standard deduction. If this missing mass were a feature of the distribution and not due to the standard deduction, it would not track the standard deduction once it is increased.

3 Cost Estimation

3.1 Cost Estimation Methodology

To calculate the distribution of forgone benefits in the population, I need to reconstruct the counterfactual distribution of itemizers. Using the pre-reform year as the counterfactual distribution would lead to an underestimate of the cost because the pre-reform distribution is distorted by its proximity to the standard deduction, as shown in Figure 2a. This section explains how I reconstruct the counterfactual distribution. Importantly, this estimation method is *model-free*: the estimated distribution of forgone benefits does not require nor depends on any assumptions made over the determinants of the forgone benefits except for assumptions A1 and A2 below. No assumptions about the drivers of the cost are

¹⁰More details about the parallel system and other changes are provided in Appendix Section F.

¹¹Appendix Figure H.11 reports these densities for the 1971, 1975 and 2003 reforms and shows that the changes are qualitatively consistent with the 1988 reform.

needed in this section: the distribution of costs can be due to the costs of record keeping and filing, or due to fear of audits and uncertainty. While alternative explanations – discussed in Section 5 – could change the interpretation of the estimated dollar amount of forgone benefits, they would not change the dollar amount itself.

Denote by $f(\cdot)$ the unobserved p.d.f. of itemizers, assuming that there is no standard deduction and no cost of itemizing, as illustrated in Figure 3. Denote by $g_S(\cdot)$ the observed probability density function (p.d.f.) of itemizers when the standard deduction is equal to S . Then, $g_0(\cdot)$ and $g_\delta(\cdot)$ correspond, respectively, to the pre- and post-reform p.d.f. of itemizers when the standard deduction increases from 0 to δ . The cumulative distribution function (c.d.f.) of the cost of itemizing is denoted by $C_S(\cdot)$ and is defined over $[0, c_{max}]$, where c_{max} denotes the largest cost an individual can have. Individuals whose total deductions exceed the standard deduction by less than the cost of itemizing choose the standard deduction. Formally,

$$\forall S = \{0; \delta\} : \quad g_S(d) = \begin{cases} 0, & \text{if } d \leq S \\ f(d)C_S(d - S), & \text{if } S < d \leq c_{max} + S \\ f(d), & \text{if } d > c_{max} + S. \end{cases} \quad (1)$$

By rearranging (1) over $d \in [0, c_{max}]$:

$$C_S(d - S) = \frac{g_S(d)}{f(d)}. \quad (2)$$

In other words, the cost of itemizing is related to the missing mass $\frac{g_S(d)}{f(d)}$. However, because $f(\cdot)$ cannot be observed directly, it needs to be reconstructed using $g_0(\cdot)$ and $g_\delta(\cdot)$. Two assumptions are necessary:

- **A1:** Cost is constant across years.
- **A2:** Cost is independent of the level of deductions.

Assumptions A1 and A2 imply that $C_0(\cdot) = C_\delta(\cdot)$, and from equation (2), it follows that:

$$C_0(d) = \frac{g_0(d)}{f(d)} = \frac{g_\delta(d + \delta)}{f(d + \delta)} = C_\delta(d), \quad (3)$$

which implies that the same proportion of individuals is missing d deductions above the pre-reform standard deduction and $d + \delta$ deductions above the post-reform standard deduction.

Assumption A1 can be verified by graphing two densities in years with no reforms and ensuring that they are overlapping. This assumption is verified on all years from 1980 to 2006.¹² A failure of A2 introduces a bias: in Appendix section B, I provide an upper bound on the size of this bias and show that it is small. Intuitively, if A2 fails, $g_\delta(\cdot)$ can be used instead of $f(\cdot)$. This will necessarily yield lower bounds, since $g_\delta(\cdot) < f(\cdot)$. For joint filers in the 28% bracket, for example, the estimated cost would lie between \$519 and \$591 if A2 fails, instead of \$591.

To estimate $C_0(\cdot)$ and reconstruct $f(\cdot)$, I proceed in three steps. First, if $d \in [\delta + c_{max}; +\infty]$, then the benefit of itemizing is greater than its cost both pre- and post-reform, and taxpayers will not forgo deductions by claiming the standard deduction. This corresponds to the rightmost area in Figure 3. Formally, if $d \in [\delta + c_{max}; +\infty]$, then $C_0(d) = 1$ and $g_\delta(d) = g_0(d) = f(d)$, i.e., the pre- and post-reform distributions of itemizers overlap for ranges of deductions exceeding the post-reform standard deduction δ by more than the largest possible cost c_{max} . And for any $d \in [\delta + c_{max}; +\infty]$, $f(d) = g_0(d)$, i.e., the pre-reform observed distribution of itemizers $g_0(\cdot)$ corresponds to the undistorted distribution $f(\cdot)$.

Second, if $d \in [c_{max}; \delta + c_{max}]$, then, over this range, the pre-reform taxpayers do not forgo any deductions, but the post-reform ones do. This corresponds to the middle area in Figure 3. As a consequence, the pre-reform distribution is not affected by its proximity to the standard deduction and is equal to the undistorted distribution, i.e., $g_0(d) = f(d)$, but the post-reform distribution is distorted, i.e., $g_\delta(d) < f(d)$. From equation (3), it follows that $\forall d \in [c_{max}; \delta + c_{max}]$:

$$C_0(d - \delta) = \frac{g_\delta(d)}{f(d)} = \frac{g_\delta(d)}{g_0(d)}, \quad (4)$$

which allows me to estimate $C_0(\cdot)$ over $[c_{max} - \delta; c_{max}]$.

Third, if $d \in [c_{max} - \delta, c_{max}]$, then both the pre-reform and post-reform itemizers are forgoing deductions. This corresponds to the leftmost area in Figure 3.

¹²See Appendix Figure H.12.

In this case, both the pre- and post-reform distributions are distorted by their proximity to the standard deduction and $g_0(\cdot)$ is now different from $f(\cdot)$. To reconstruct $f(\cdot)$, I use the estimate of $C_0(\cdot)$ over $[c_{max} - \delta; c_{max}]$ from equation 4 to correct the pre-reform distribution by using the definition of $g_0(\cdot)$ from equation (2): $f(d) = \frac{g_0(d)}{C_0(d)}$. From equation 3, it follows that $\forall d \in [c_{max} - \delta; c_{max}]$

$$C_0(d - \delta) = \frac{g_\delta(d)}{f(d)} = \frac{g_\delta(d)}{g_0(d)} C_0(d), \quad (5)$$

which allows me to estimate $C_0(\cdot)$ over $[c_{max} - 2\delta; c_{max} - \delta]$. By repeating this procedure over $[c_{max} - 3\delta; c_{max} - 2\delta]$, $[c_{max} - 4\delta; c_{max} - 3\delta]$, etc., I can recover $C_0(\cdot)$ and $f(\cdot)$ over $[0, c_{max}]$.

3.2 Cost Estimates

I apply the methodology outlined above to the 1988 reform, which increased the standard deduction from \$2,540 to \$3,000 for single filers, from \$3,760 to \$5,000 for joint filers and from \$2,540 to \$4,400 for head-of-households filers. Besides the standard deduction reform, the only other 1988 reform that could have affected the amount of deductions was the phase-out of the personal interest deduction, which I control for (details in Section 5.5).¹³ Each cost estimate is performed on individuals with the same marginal tax rate and who were not subject to the AMT. There was a marginal tax rate decrease for married filing jointly with income above \$45,000 (in 1987 dollars) in 1988. I address this by estimating the cost separately for individuals above and below this cutoff.

I use 1989 rather than 1988 as the post-reform year because the reform occurred in 1988. If taxpayers learned about the increase in the standard deduction when filing their taxes, we should observe the full response in 1989. Figure 2b confirms that the effect was smaller during the reform year.

Table 1a shows the estimated costs for single, joint and head-of-households filers in the 15% and 28% marginal tax brackets. Costs range from 0.57% to 0.85% of AGI. In dollar amounts, they vary from \$175 for single filers in the 15% bracket to \$591 for joint filers in the 28% bracket. Costs expressed in dollars are systematically lower for individuals in lower tax brackets. They are, however, more homogenous when expressed as a percent of AGI. This suggests that income

¹³See Appendix Section E for the TRA'86 reforms.

matters in determining the cost, as shown in Section 4.1.

To calculate the standard errors of the difference between the bins in the 1987 and 1989 densities, I use a bootstrap procedure. The results are reported in Table I.4. The difference between the first and second bins is statistically significant with large z statistics (6.55 and 3.47). The rest of the bins are all overlapping, with differences that are not significant, with the exception of bins 10, 11 and 13, which are statistically significantly different at the 5% and 10% level, with differences of a very small magnitude (less than ten times that of the first or second bins).

4 Anatomy of the Missing Mass

4.1 Costs Increase With Income

If rich taxpayers value their time more than poor ones because their hourly wage is higher, we should expect them to forgo more deductions. I test this using the income reported on tax returns. I break down the sample used above by deciles of income. This reduces the power, which I deal with in two ways. First, I use a moving average of income deciles. Second, I focus on joint filers in the 28% marginal tax bracket, as they represent by far the largest group of taxpayers.

I then fit a flexible polynomial through each deduction bin and calculate the difference in density for each bin. When this difference is not statistically significant, I consider that the bins are overlapping, and, therefore, no deductions are forgone in that specific bin. Using the predicted bins from this polynomial, I calculate the forgone benefits for each group by repeating the procedure developed in Section 3.¹⁴ The results are plotted in Figure 4a: as income increases, taxpayers forgo more deductions, consistent with the idea that they value their time more. Notice that all taxpayers in Figure 4a fall in the 28% marginal tax bracket, implying that the positive relationship between income and forgone benefits is not due to marginal tax rate variation but, rather, to income. Second, even though itemized deductions increase with income, this is not what drives the increasing relationship between income and forgone benefits. Because I compare

¹⁴I only report results for the first seven groups because deductions and income are positively correlated and very few high-income individuals are close to the standard deduction threshold. However, the increasing relationship is robust to including those bins, see Appendix Figure H.16.

the same income groups before and after the reform, I am implicitly controlling for the relationship between income and deductions.

4.2 Tax Preparers and Electronic Filing

Electronic filing (e-filing) and tax preparers may reduce the cost of filling out forms. However, they do not affect the cost of record keeping. Therefore, e-filing and tax preparers are unlikely to eliminate the observed missing mass. Survey estimates of the cost of filing taxes have consistently documented that record keeping is the main driver of the cost of itemizing.¹⁵

To test for the effect of e-filing and tax preparers, I graph the density of itemizers who use a tax preparer or e-file in Figures 4c and 4b. There is still a missing mass, implying that e-filing or tax preparers do not eliminate the cost of itemizing.

Figure 4c compares the density of taxpayers who use e-filing to those who do not. It shows a slightly smaller missing mass for taxpayers who e-file.¹⁶ This is consistent with the missing mass being driven by taxpayers who claim the standard deduction to avoid the cost of itemizing. However, e-filing only slightly reduces the cost of itemizing and does not eliminate the missing mass, which is consistent with record keeping being the main driver of compliance costs. I cannot perform a similar test for taxpayers who use tax preparers, as the two densities do not overlap away from the standard deduction, making a direct comparison of the missing mass impossible.

5 Alternative Explanations to Compliance Costs

5.1 Information

Information is unlikely to explain the missing mass. Since I focus on taxpayers who switch from itemizing to claiming the standard deduction, they should be aware of the decision to itemize. In addition, taxpayers are reminded on the 1040 form that they can make the choice between itemizing and claiming the standard deduction.

¹⁵See, for example, Guyton et al. (2003), Slemrod and Sorum (1984), Slemrod and Bakija (2008) and Blumenthal and Slemrod (1992).

¹⁶The difference is statistically significant: bootstrapped standard errors are reported in Table I.7

5.2 Concave Kink Points

The standard deduction acts as a *concave* kink point: the price of charitable donations is lower when itemizing than when claiming the standard deduction. The indifference curve of a given taxpayer can be tangent at two points of the concave kinked budget set, possibly inducing some taxpayers to be indifferent between these two points. Depending on the curvature of the indifference curve, this could create a bi-modal distribution with a missing mass both to the right and to the left of the standard deduction.

However, in this case, the size of the missing mass should not respond to variations in income when controlling for marginal tax rates. The only reason taxpayers would adjust their deductions in response to a concave kink point is variation in marginal tax rates, while changes in income should not matter. On the other hand, a behavioral response due to compliance costs predicts that richer taxpayers will forgo more money because they have a higher opportunity cost of time, even controlling for marginal tax rates. Consistent with the compliance cost interpretation, Figure 4a graphs the relationship between forgone benefits and income - *controlling for marginal tax rates* - and finds an increasing relationship.

In addition, behavioral responses to concave kink points lead individuals to locate away from the concave kink point. If behavioral responses to concave kink points led to the observed missing mass, as the standard deduction increases, the bi-modal distribution should track the new standard deduction threshold and the pre- and post-distribution peaks should not overlap. The observed pre- and post-distributions in Figures 2a and 2b contradict this prediction: the pre- and post-distribution peaks are overlapping, once again rejecting the hypothesis that the missing mass is caused by behavioral responses to concave kink points. A graphical illustration of this argument is provided in Appendix Figure H.18.

Overall, both of these empirical tests rule out responses to concave kink points. This is consistent with the previous literature. Saez (2010), Kleven and Waseem (2013) and Tazhitdinova (2015) directly test the predictions of a behavioral response to both concave and convex kink points, and find responses to convex kink points but not to concave kink points. Kleven (2016), in a survey of the bunching literature confirms that there is no evidence of bunching at concave kink points.

5.3 Evasion

An alternative explanation for the missing mass is that taxpayers are concerned with being audited by the IRS. They mistakenly believe that audit probabilities are higher when itemizing. Their beliefs could lead them to switch to the standard deduction once it increases, in order to avoid the expected cost of an audit.

However, since audit probabilities are very low, for this behavior to explain the missing mass, taxpayers would need to mistakenly believe that audit probabilities are high or that audit costs are large. To address this, I conduct a survey of 195 individuals.¹⁷ The survey allows me to elicit their beliefs about both the audit probabilities and the perceived costs of audits. Figure H.19 reports the results of the survey.

Surveyed individuals have levels of income similar to those of joint filers in the 1988 28% marginal tax bracket. On average, they believe that audits occur with a probability of 8.72%, which is 7.9 times the true audit probability.¹⁸ This accounts for, at most, 25% of the \$591 estimated forgone benefits for joint filers in the 28% marginal tax bracket.¹⁹

5.4 Rational Inattention

Can uncertainty about the level of deductions lead taxpayers to switch to the standard deduction and explain the observed missing mass? Table I.5 shows the results of the calibration of a model illustrative of this type of behavior with varying levels of risk aversion.²⁰ Taxpayers would need an uncertainty range of at least $\pm\$14,000$ in order to forgo amounts of money as those found in this paper when their true deductions are \$10,000. This uncertainty range is large and unlikely for two reasons. First, I focus on taxpayers who were itemizing in the previous year. Second, total deductions are highly serially correlated across years for a given individual since 71% of total deductions are mortgage interest, state taxes and real estate taxes, which are relatively stable for a given person

¹⁷Appendix section G details the survey instrument.

¹⁸This is consistent with Bhargava and Manoli (2015) who find that EITC filers believe that audit probabilities are eight times greater than the true ones.

¹⁹On average, their willingness to pay to avoid an audit is \$1,748, which implies that the expected cost of an audit is \$147, with a 95% confidence interval of [126, 169].

²⁰The model is outlined in Appendix section H.

year after year.

5.5 Other Reforms Affecting Deductions?

Other changes took place in 1988. In this section, I describe these changes and explain how I adjust for those that are likely to affect my estimates. The estimates derived in Section 3 have already accounted for these adjustments. The fact that the pre- and post-reform densities overlap away from the standard deduction threshold shows that the pre-reform density is a relevant counterfactual for the post-reform density in Figure 2a and that – after adjusting for these changes – the missing mass estimates are not affected by these changes.

The personal interest deduction was phased out starting in 1986. Taxpayers could deduct only 65% of their personal interest in 1987, 40% in 1988 and 20% in 1989. This is likely to affect the distribution of deductions from 1987 to 1989. To control for this effect, I adjust the 1987 distribution - which is the counterfactual for 1989 - by recalculating the personal interest deduction as if only 20% of it could be deducted. This leads some taxpayers to have deductions below the standard deduction, and I drop them from my sample. To ensure that there is no behavioral effect associated with the phasing out of the personal interest deduction, I compare the distribution of deductions for individuals above and below the 28% marginal tax rate bracket. If there had been a behavioral effect, we should observe more deductions for individuals above the 28% marginal tax bracket. I find no significant behavioral response of personal interest deductions.²¹ This is consistent with the fact that the majority of the personal interest deduction is claimed for interest on student loans, which are hard to adjust once they are contracted. In addition, after making this correction, I can compare the overlap between the pre- and post-reform densities. Away from the standard deduction, the two graphs overlap, implying that the post-reform density is an appropriate counterfactual for the 1989 density.

6 Aggregate Compliance Costs

The itemization margin provides plausibly exogenous variation, however, as is common for most quasi-experimental designs, it is local to the population of interest. To estimate aggregate compliance costs, I make use of the results of an

²¹See Appendix figure H.20.

extensive survey of the *time* required to file taxes conducted by the IRS along with my quasi-experimental estimates. The IRS regularly surveys a representative sample of the US population, to elicit the time it takes to file each form and perform the associated record-keeping. While the results are not informative of the disutility taxpayers derive from filing taxes, they provide the best available estimates of the time spent filing them. Assuming that the per-hour disutility of filing and record-keeping for Schedule A is similar to other schedules, I can make use of the hour estimates to scale the disutility estimated from the itemization margin in order to estimate the cost of filing other schedules. Assuming taxpayers work an average of 1,783 hours per year (OECD estimates), the implied hours using my estimates range from 10 to 15 hours depending on the filing status and the tax bracket (see Table 1a). The IRS estimates that it takes an average of 4.5 hours to file and keep records for Schedule A, this implies a disutility scalar ranging from 2.2 to 3.3. Table 1b shows the implied aggregate cost estimates. Overall, aggregate filing costs are equal to 0.83% of GDP. I use a more sophisticated estimation approach in Appendix Section C, which accounts for differences in demographics, use of tax preparers and e-filing, and find even larger aggregate cost estimates.

This approach does not allow me to estimate the evolution of costs over time and, in particular, how the increase in e-filing has affected aggregate costs. However, e-filing is unlikely to have large effects on costs for two reasons; (1) e-filing only affects the cost of filling out forms, which, according to survey estimates, is smaller than that of record-keeping, (2) Figure 4c shows that e-filing has limited effects on the decision to itemize for taxpayers at the margin. In Appendix Section C, I use the e-filing estimates from Figure 4c to adjust cost estimates over time and show that, even with the rise in e-filing, costs have been steadily rising. The raw data shows that this is in part due to a steady increase in the *number* of schedules filed over time. Figure 4d plots the number of forms filed by schedule over time. While one additional Schedule was filed for each 1040 form in the mid-1980's, this proportion is almost two-to-one in recent years, suggesting that costs may have been increasing over time.

7 Conclusion

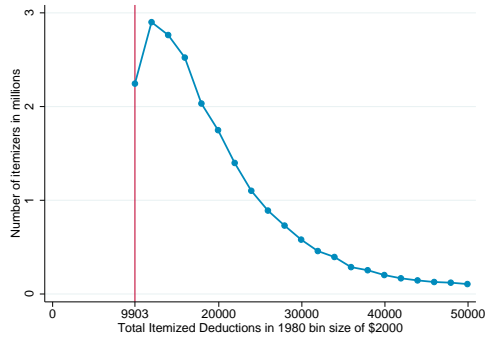
Using a quasi-experimental design and a novel method to recover the counterfactual density of deductions, I find that taxpayers forgo large amounts of tax benefits, suggesting large tax filing costs. The identification strategy used in this paper can be exported to estimate other compliance costs when individuals have a choice between a low-cost/low-benefit option versus a high-cost/high-benefit one, as is the case in, for example, deciding whether to file a lawsuit in small claims court versus regular court. It can also be used when identifying responses from a censored distribution above or below a certain threshold.

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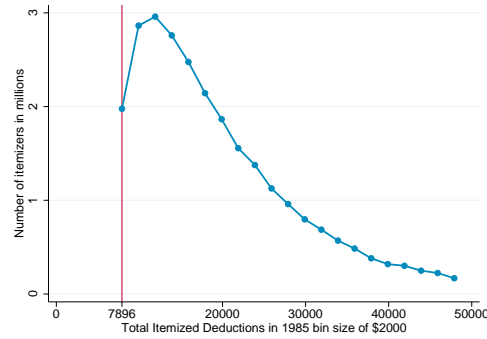
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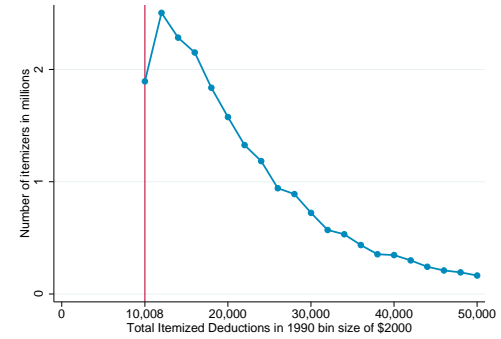
Figure 1: Missing Mass Just Above the Standard Deduction



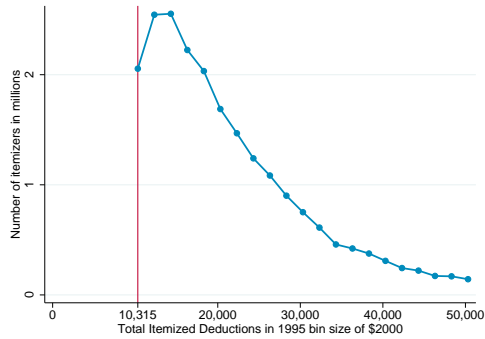
(a) 1980



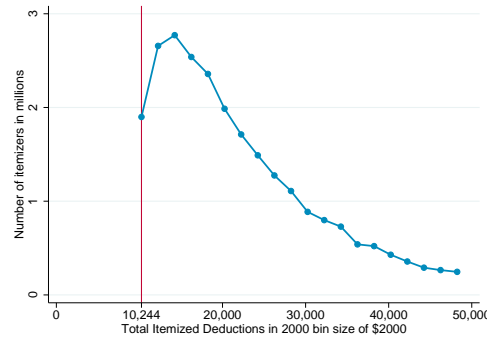
(b) 1985



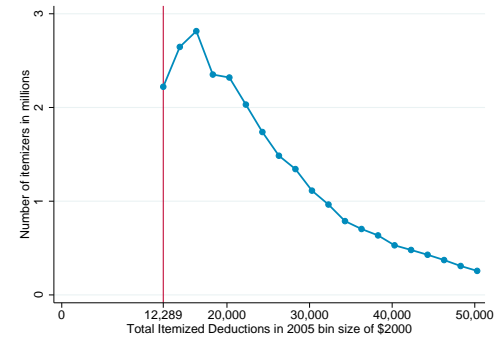
(c) 1990



(d) 1995



(e) 2000

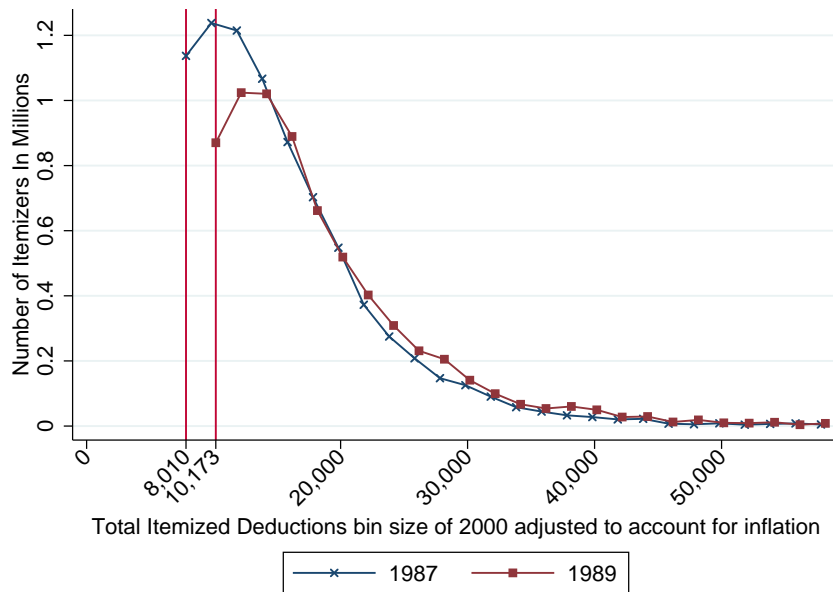


(f) 2005

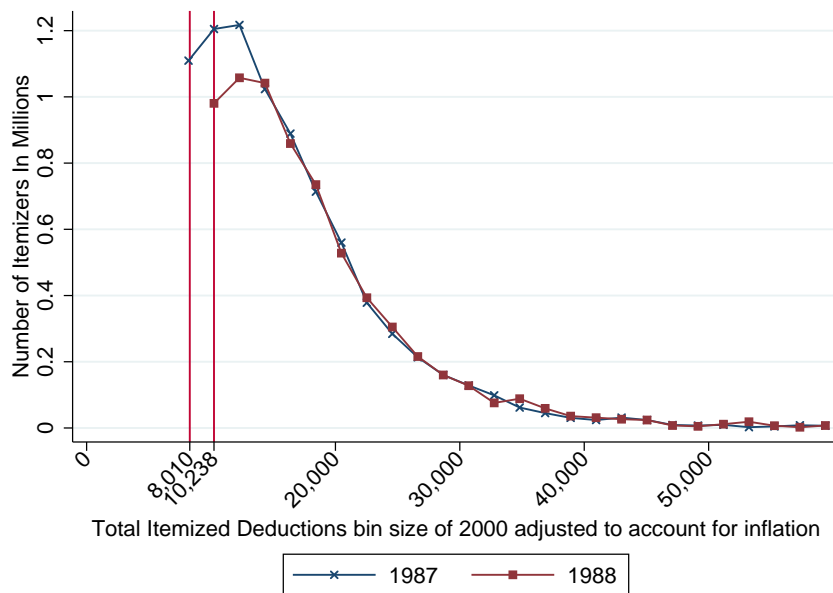
Notes: The figures above plot the density of deductions for itemizers filing jointly. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year. Additional years are reported in appendix figures H.6, H.7, H.8 and H.9 and figure H.10 for single filers.

Figure 2: Density of Deductions for Itemizers Filing Jointly Pre- and Post-Reform

(a) 1987-1989 Comparison

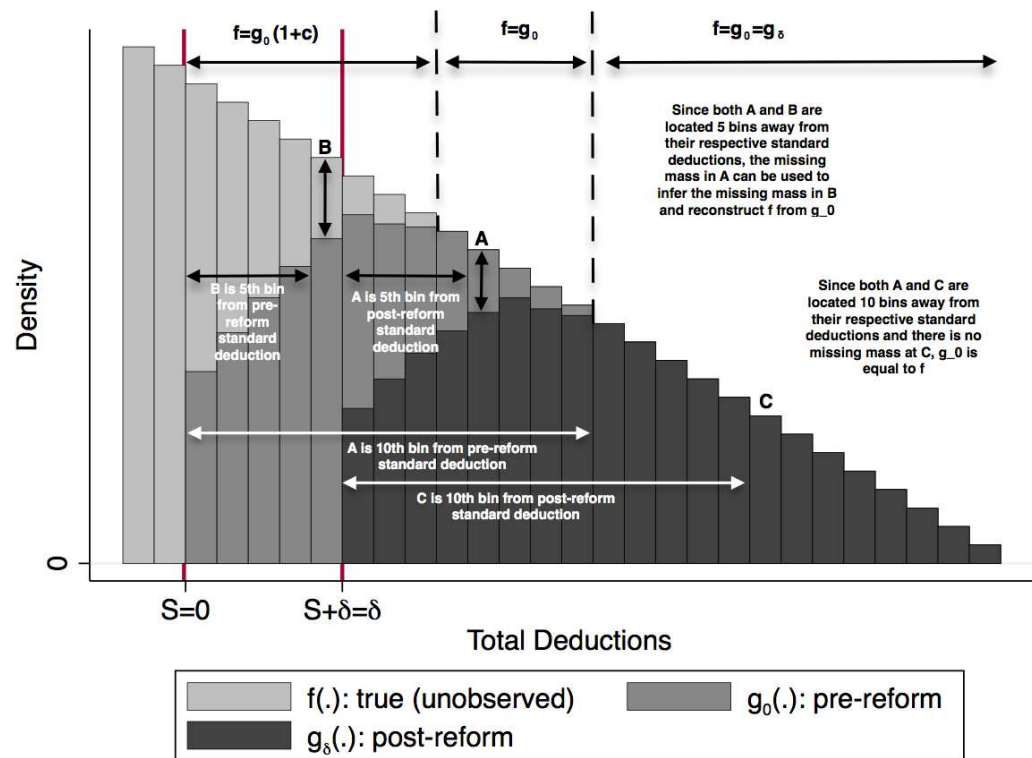


(b) 1987-1988 Comparison



Notes: The first graph plots the density of itemizers one year before and one year after the standard deduction reform, while the second one plots these densities one year before and during the reform.

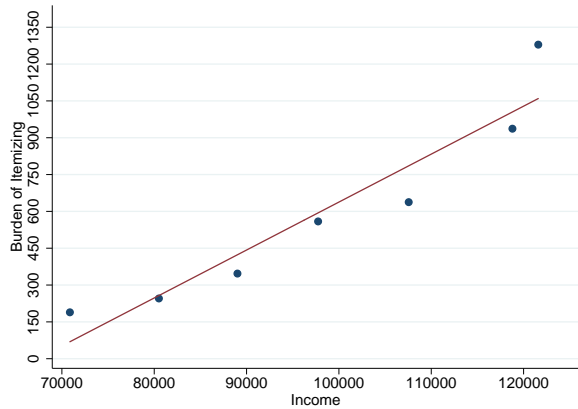
Figure 3: Recovering the Counterfactual Distribution of Deductions



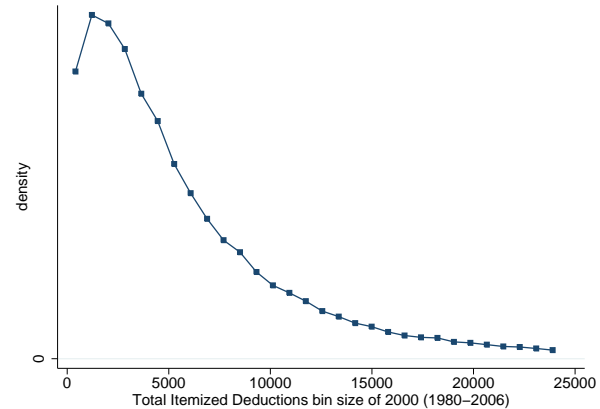
Notes: This graph illustrates the method used in Section 3.1 to reconstruct the counterfactual density of itemizers $f(\cdot)$ using the pre- and post-reform densities $g_0(\cdot)$ and $g_\delta(\cdot)$.

Figure 4: Anatomy of the Missing Mass

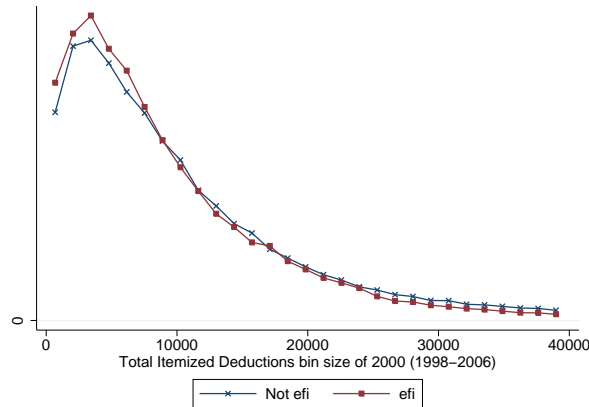
(a) Costs Increase with Income



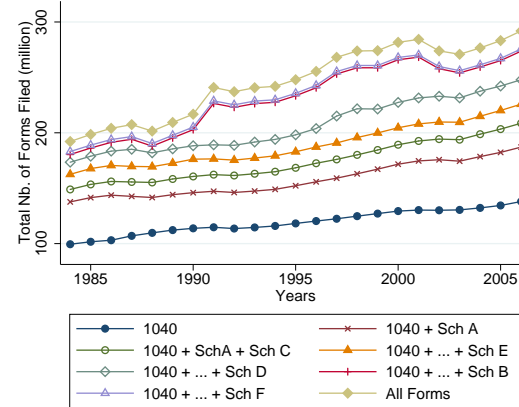
(b) Tax Preparers



(c) Electronic Filing



(d) Number of Forms Filed



Notes: The first graph plots the relationship between income and the cost of itemizing. This relationship controls for the variation in MTR across the different income groups. The second and third figures show the distribution of itemized deductions for taxpayers who use tax preparers and e-filing. The x-axis is normalized such that 0 corresponds to the standard deduction threshold. The third graph pools years 1980 to 2006 and the fourth one years 1998 (start of e-filing) to 2006. The fourth graph shows the evolution of the number of forms filed over time.

Table 1: Cost Estimates

(a) Estimates of the Cost of Itemizing

Filing Status	MTR	Cost as % of AGI	Implied Hours	Ratio	Cost in \$
Single	15%	0.83	14.7	3.24	\$175
Single	28%	0.85	15.2	3.36	\$369
Joint	15%	0.57	10.2	2.25	\$243
Joint	28%	0.74	13.2	2.90	\$591
Head	15%	0.76	13.6	3.00	\$270
Head	28%	0.72	12.8	2.83	\$458

(b) Aggregate Costs of Filing Taxes

Form	(1) Hours (from IRS Survey)	(2) Per-Hour Income (in \$)	(3) Disutility Scaling Factor	(4) Individual Cost (in \$)	(5) Nb. of Forms Filed (billion)	(6) Aggregate Burden (in \$b.)	(7) % of GDP
1040	9.40	17.69	2.87	477.37	0.11	53.47	0.49
Sch. A	4.53	34.70	2.76	433.83	0.03	13.88	0.13
Sch. B	1.28	22.26	2.87	81.76	0.01	1.01	0.01
Sch. C	9.63	22.12	2.64	562.32	0.01	7.87	0.07
Sch. D	3.75	37.05	2.81	390.40	0.01	3.33	0.03
Sch. E	5.83	35.67	2.75	571.81	0.01	8.12	0.07
Sch. F	16.10	21.43	2.56	883.14	0.00	2.08	0.02
Sch. SE	1.13	17.00	2.65	50.92	0.01	0.59	0.01
Total						90.35	0.83

Notes: The first table shows the cost of itemizing as estimated in section 3. The second table reports the aggregate cost of filing each Schedule of the income tax return. Column 1 shows the number of hours it takes to keep records and fill out each schedule, as estimated by the IRS surveys. Column 2 is estimated using the SOI dataset by restricting the sample to individuals with positive wages and dividing the annual wage by 1,783 hours (estimates of annual hours worked by OECD). Column 3 is equal to the ratio of the cost estimates in Section 3 divided by the product of columns 1 and 2. Column 4 is the product of columns 1, 2 and 3. Column 5 is reported in the SOI files. Column 6 is the product of columns 4 and 5. Column 7 is equal to column 6 divided by GDP.

WEB APPENDIX

FOR ONLINE PUBLICATION

A Pitt and Slemrod (1989)

Pitt and Slemrod (1989) very elegantly apply the methods of Gronau (1973) and Nelson (1977) to assess the compliance cost of itemizing deductions by estimating a censored model with unobserved censoring thresholds using maximum likelihood.

To do so they estimate a cost and benefit function of itemizing deductions. The benefit of itemizing is given by $TS_i = X_i\beta + u_i$ where X_i are exogenous and observed characteristics, β is a vector of parameters and u_i an error term. Similarly, the cost of itemizing is assumed to be $C_i = Z_i\gamma + v_i$, where Z_i are exogenous and observed characteristics, γ a vector of parameters and v_i an error term. A person will itemize if $TS_i \geq C_i$. TS_i is only observed when $TS_i \geq C_i$ but C_i is never observed. Gronau (1973) and Nelson (1977) show that if u_i and v_i are uncorrelated or if there are some characteristics present in X_i but not in Z_i then the model is identified and a likelihood function can be maximized to estimate both TS_i and C_i . Pitt and Slemrod (1989) acknowledge that there is no reason to assume that the errors are uncorrelated but that there are some characteristics that are likely to be present in X_i but not in Z_i , therefore arguing that identification should be valid.

The set of exogenous and observable characteristics they consider to estimate both β and γ are whether a person is married, her AGI, the square of AGI, whether a person owns a farming business, the number of age exemptions a person claims and the number of exemptions claimed. The set of exogenous characteristics specific to β are positive investment income, the average state income and sales taxes for an income of \$40,000, the average property tax rate in a given state and an index of medical costs in a given state.

If the assumptions from Gronau (1973) and Nelson (1977) hold and given these exogenous and observed characteristics, they can estimate the cost and benefit function. They find that the average cost of itemizing is \$107 (in 2016 dollars), i.e., 6 times lower than the cost I estimate.

Since Pitt and Slemrod (1989) acknowledge that u_i and v_i are likely to be correlated, for the Gronau (1973) and Nelson (1977) estimators to be consistent, the exclusion restriction imposed on X_i and Z_i becomes necessary for identification.

B Assumption A2

Assumption A2 states that the cost should not increase with the level of deductions. It makes sense to assume that the cost of deducting \$10,000 worth of mortgage interest is the same as deducting \$100,000 because total mortgage interest is reported on form 1098. However, it is also reasonable to assume that an individual who donates \$100,000 to charity is more likely to donate to more charities than an individual who donates \$10,000.

Assumption A2 is important for equation 3. Intuitively, it allows me to infer the distortion imposed by the standard deduction on the pre-reform distribution in bin j from bin $j+m$ when the pre- and post-reform standard deduction thresholds are m bins away. A2 can fail if the cost of itemizing decreases with the size of total deductions which would bias my cost estimate downwards. But more importantly it can fail if the cost of itemizing increases with the size of total deductions, which would overestimate the cost. There is an easy way to provide an upper bound for the bias introduced by a failure of A2: by using the pre-reform distribution $g_\delta(d)$ as the true counterfactual instead of $f(d)$. This is a generous upper bound because it assumes that the pre-reform distribution is undistorted just above the standard deduction in spite of figure 2a showing a clear distortion. In this case, the estimated cost would be \$519 instead of \$591. Therefore if A2 fails, the cost of itemizing would lie between \$519 and \$591.

C Extrapolation

In this section, I estimate the effect that some demographics have on cost and use those estimates to extrapolate the cost to other tax schedules. I do so for four variables: income, dependents, use of tax preparers and electronic filing.

To estimate the effect of dependents and the use of tax preparers on the cost of itemizing, I apply the procedure outlined in Section 3.1 for the 1988 reform on subsamples of joint filers. I use joint filers to perform this subsample analysis because they represent more than 50% of the population of filers, which is essential to getting enough power when breaking down the main sample into

multiple groups. This means that my approach relies on the assumption that these demographics affect filing costs in the same way for different types of filers and for different years. To estimate the effect of tax preparers, I compare the cost for joint filers who use a tax preparer to the the cost for those who do not. I use a similar approach for taxpayers with and without dependents. To estimate the effect of income on the cost of filing, I use the estimates from Section 4.1. Because electronic filing did not exist in 1988, I cannot use the procedure from Section 3.1. Instead, I pool all cross-sections in years in which electronic filing was commonly used – 1998 to 2006; fit a polynomial through the bins that are away from the standard deduction to extrapolate the counterfactual distribution close to the standard deduction; and compare the distribution of electronic filers and paper filers to this counterfactual to assess the size of the missing mass for each group.²² Formally, I assume that the filing cost is given by the following equation:

$$C = \beta * \{[(\alpha_{efi}\mathbb{1}_{efi} + \alpha_{\overline{efi}}(1 - \mathbb{1}_{efi})) + [\alpha_{prep}\mathbb{1}_{prep} + \alpha_{\overline{prep}}(1 - \mathbb{1}_{prep})] + [\alpha_{dep}\mathbb{1}_{dep} + \alpha_{\overline{dep}}(1 - \mathbb{1}_{dep})] + \sum_{i=0}^9 \alpha_i \mathbb{1}_i\}, \quad (6)$$

where β is the baseline cost of itemizing, as estimated in Section 3.1; α_{efi} is the effect of electronic filing on the cost of itemizing; and $\alpha_{\overline{efi}}$ is the effect on the cost of not filing electronically. The remaining variables are defined similarly, with $prep$ corresponding to the use of a tax preparer and dep having at least one dependent child. Each α_i coefficient corresponds to the effect of income on the cost. These are derived in Section 4.1: each α_i is equal to the ratio of the cost of itemizing for income group i divided by the average cost of itemizing for all groups. The coefficients are reported in Table I.3.

C.1 Other Schedules

To infer the cost of filing other schedules, I assume that, holding constant the number of hours spent working on a given tax schedule, taxpayers derive the same disutility from each tax schedule. In other words, they do not dislike filing any particular schedule more than others, as long as each requires the same number

²²The three distributions are shown in Figure H.15.

of hours. I also assume that the demographics estimated above affect the cost of other schedules in the same way. The IRS provides estimates of the number of hours required to file each tax schedule based on surveys of taxpayers at the time of filing.²³ I use these survey estimates to scale the cost estimates of other schedules. For example, filing schedule B requires 1 hour and 19 minutes, which is 28% of the total time required to file schedule A; therefore, I assign a baseline cost of filing schedule B of 28% of that of schedule A. The filing cost for each taxpayer is given by an equation similar to equation (6), with a subscript x that corresponds to each tax schedule:

$$C_x = \beta_x * \{[(\alpha_{efi}\mathbb{1}_{efi} + \alpha_{\overline{efi}}(1 - \mathbb{1}_{efi})) + [\alpha_{prep}\mathbb{1}_{prep} + \alpha_{\overline{prep}}(1 - \mathbb{1}_{prep})] + [\alpha_{dep}\mathbb{1}_{dep} + \alpha_{\overline{dep}}(1 - \mathbb{1}_{dep})] + \sum_{i=0}^9 \alpha_i \mathbb{1}_i\}, \quad (7)$$

where C_x is the cost of schedule $x = 1040, A, B, C, D, E, F, SE$, and β_x is the baseline cost estimate of schedule x . The coefficients are reported in Table I.3.

C.2 Costs Have Been Increasing Since the 1980s

Using equation (7), I estimate the total cost of filing all federal income tax schedules for every year from 1984 to 2006.²⁴ Figure H.21a shows that costs have been increasing steadily, from \$150bn in 1984 to \$200bn in 2006 (both in 2016 dollars). Part of this increase is mechanically driven by an increase in the number of tax filers. But it is also driven by a steady increase in the number of taxpayers who have to file other schedules in addition to the 1040 form. Some of these schedules require a substantial amount of time to be filed. While it is often believed that filing costs have decreased over time since the 1980s because of the rapid increase in electronic filing, Figure 4d shows two countervailing forces to electronic filing that drive total costs upwards: the number of individuals who file taxes and the number of scheduled filed by each taxpayer. My estimates suggest the upward pressure on filing costs exerted by these two forces outweigh the cost savings of electronic filing. The number of non-1040 forms filed can be easily

²³According to IRS survey estimates, the 1040 form requires 9.4 hours, Schedule A 4.5 hours, Sch. B 1.3 hours, Sch. C 9.6 hours, Sch. D 3.8 hours, Sch. E 5.8 hours, Sch. F 16.1 hours and Sch. SE 1.1 hours. See Appendix Table I.10 for a breakdown of the cost.

²⁴I start in 1984 because prior years are missing information on Schedule SE.

reduced by increasing the filing thresholds for their corresponding schedules. The cost savings from increasing these thresholds would need to be weighed against the effect they would have on increasing evasion.²⁵

D Sample Restrictions

D.1 Figure 1

The sample used for figure 1 are joint filers who itemize deductions. I focus on joint filers because they represent more than 50% of the population and the standard deduction is specific to the filing status. This means that I cannot show every tax filing status on the same graph because they would have different standard deductions. Figure H.10 shows the same patterns for single taxpayers.

D.2 Figures 2a, 2b

In figure 2a and 2b, I focus on taxpayers who are married filing jointly for the reasons outlined in section D.1. In addition, in 1988 and 1989 there were two tax brackets (15% and 28%) and a tax rate “bubble” (33%). Most taxpayers who itemize deductions fall in the 28% marginal tax bracket. Therefore, to control for the change in marginal tax rates, I only consider taxpayers who fall in the 28% marginal tax rate bracket. This allows me to precisely calculate the amount of after tax forgone benefit.

D.3 Figure 4a

In figure 4a, I use the same sample restrictions as in figure 2a and 2b and break down the sample into deciles of income.

D.4 Figures 4c and 4b

To generate Figures 4c and 4b, I consider joint filers as explained in section D.1. In Figure (a), I consider all years from 1980 to 2006 but exclude 1985 and 1990 because the tax preparer variable is missing in those years. In Figure (b), I consider all years from 1998 to 2006 because few taxpayers used electronic filing prior to 2006.

²⁵Tazhitdinova (2014) explores this tradeoff in the case of charitable donations.

D.5 Taxpayers Who Have To Claim the Standard Deduction

In rare cases, taxpayers have to claim the standard deduction even when their itemized deductions exceed the standard deduction. These individuals are dropped from my sample. This happens in the following four cases:

1. A married taxpayer whose spouse files separately and itemizes deduction.
2. In some states, a taxpayer who wants to itemize on her state tax return has to itemize on her federal tax return as well.
3. A taxpayer who is neither a citizen nor a permanent resident of the United States.
4. A taxpayer who can benefit from itemizing for alternative minimum tax purposes even though the standard deduction is greater than the sum of her itemized deductions.

E Tax Reform Act of 1986 and Lagged Responses

Could there be any other exogenous variation altering the distribution of itemized deductions in 1989 affecting my main identification strategy? The majority of tax reforms happened following the TRA'86 and were enacted in 1987. Among those, there were some deduction reforms. Because I am comparing 1987 to 1989, I am implicitly controlling for the Tax Reform Act of 1986 (TRA'86) reforms. But there might be slow adjustments and lagged responses in 1988 or 1989. To rule these out, I consider all the reforms enacted by TRA'86 that could affect the level of deductions and show that it is reasonable to assume that the adjustment is immediate. Because all of the reforms reduced the amount of eligible deductions, they have no lagged response. To see this consider a hypothetical example: assume the charitable donation deduction is capped at \$10,000. A taxpayer who was donating \$15,000 will now only be able to deduct \$10,000. Will the taxpayer reduce her donations? She might reduce them up to \$10,000 but there is no reason to expect that she will reduce them any further. What does this imply for the level of deductions? We should observe a drop in deductions to \$10,000 in 1987 and then *no further* drop in 1988 or 1989, ruling out any lagged responses. Since I am comparing 1987 to 1989, any reform that caps the amount of deductions should not affect my estimates. The deduction reforms enacted in

1987 are the following (source: IRS):

- Prior to 1987, medical deductions in excess of 5% of the AGI are deductible. In 1987, this threshold is increased to 7.5% of AGI, further limiting the allowable amount of medical deductions. There is no reason to assume that there will be a slow adjustment that spills over into 1988 or 1989 in this case.
- Sales taxes are not deductible anymore. For similar reasons, one should observe a drop in the total deductions in 1987 as sales taxes were a large portion of it but there should be no lagged effect.
- The home mortgage interest deduction is subject to a new limit. The home mortgage interest deductions for a given year are capped at the value of one's house (plus renovations). Anything in excess of the value of the house have to be deducted as personal interest for which only 65% of the total value can be deducted. First, the IRS estimated that very few taxpayers were affected by this reform since it is very rare that one's home mortgage interest in one given year exceeds the total value of one's house. Second, there is no reason to expect a drop in levels in the subsequent years. If a person is affected by this reform, in 1987 she will be forced to claim less deduction than she was previously claiming.
- Any interest for home mortgages in excess of 1 million dollars is not deductible anymore. Again, there is no reason to expect any lagged effects due to this reform because it caps the amount of deductions.

There are no other reforms affecting directly or indirectly the amount of itemized deductions an individual can qualify for.

F The 1971, 1975 and 2003 reforms

F.1 The 1971 and 1975 reforms

In 1970 and 1975 taxpayers could claim as a standard deduction the smaller of the standard deduction or 10% of their income. In 1971, both thresholds were increased to \$8,809 or 13% of income if income is greater than \$46,983, and the larger of \$6,166 or 13% of income for taxpayers with income smaller than \$46,983. In 1975, a similar two tiered standard deduction existed with an AGI limit of 16% and a dollar limit of \$74,431.

If I were to only look at the density of itemizers above \$6,130 in 1970 and compare it to the density of itemizers above \$8,809 in 1971, my estimates would be biased because some taxpayers who have deductions greater than \$8,809 in 1971 are likely to stop itemizing – not because of compliance costs – but only because their deductions are now smaller than 13% of their income. This is why using 1971 and 1975 will not yield accurate estimate of compliance costs (they tend to over-estimate them).

F.2 The 2003 reform

Two main changes occurred in 2003 that affect the post-reform standard deduction. The first one is that tax rates were reduced 2 to 3 percentage points (depending on the bracket), reducing the incentive to itemize. The second one is that electronic filing was rapidly expanding in the early 2000's complicating the comparison between the pre and post-reform standard deduction.

G Audit Survey

The survey was carried outside a health food supermarket in Santa Monica, California. The location was chosen to attract as many wealthy individuals as possible to increase the proportion of itemizers. 195 individuals were surveyed of which 114 file their taxes themselves. Of those 95 itemize deductions, which constitutes the final sample. They were asked the following questions:

1. Do you file taxes yourself?
2. Do you itemize deductions or claim the standard deduction?
3. Per year, what do you think the chances of being audited are?
4. Assume the IRS wants to audit you. What is the highest amount you would pay a lawyer that would deal directly with the IRS and prevent you from being audited?
5. What is the annual income of your household? (Brackets of \$1,000)

H Rational Inattention

Could taxpayers forgo large amounts of deductions because they are uncertain of whether their total deductions are larger than the standard deductions threshold?

Most of the deductions are relatively stable from year to year as they mostly consist of items that vary very little such as mortgage payments, real estate taxes or state income taxes. This means that taxpayers should have an accurate signal of their true deductions. In addition, the expenses associated with deductions are an active decision: if deductions increase or decrease by a large percentage, taxpayers are likely to be aware of this change because they caused it.

Therefore, for rational inattention to explain the magnitude of the estimated compliance costs, one would need to assume that taxpayers receive a very noisy signal which is unlikely given that deductions vary little from year to year. I formalize this argument in what follows:

Assume that the taxpayer has a Constant Relative Risk Aversion (CRRA) utility function given by $U(x) = \frac{1}{1-\theta}x^{1-\theta}$ if $\theta \neq 1$ and $U(x) = \log(x)$ if $\theta = 1$.

Denote by τ the after tax amount of deductions the taxpayer can claim (deduction multiplied by marginal tax rate) and by S the after tax amount of the standard deduction. Assume that the taxpayer has beliefs over τ that follow a normal distribution with mean μ and standard deviation σ . Denote by c the cost incurred by the taxpayer to calculate the total amount of deductions τ . The cost is only incurred when she itemizes, not when she claims the standard deduction.

The taxpayer will decide to itemize if the expected benefit from itemizing given her beliefs over τ exceeds the cost of figuring out the level of τ i.e. c . This occurs when the following equation is satisfied:

$$\mathbb{E} \left[\frac{1}{1-\theta}(\tau - c)^{1-\theta} \right] \geq \frac{1}{1-\theta}S^{1-\theta}. \quad (8)$$

This equation does not have a closed form solution, so I use a Taylor expansion of second degree around the mean of $\tau - c$, as follows:

$$\frac{1}{1-\theta}(\mu - c)^{1-\theta} - \frac{1}{2}\theta(\mu - c)^{-1-\theta}\sigma^2 \geq \frac{1}{1-\theta}S^{1-\theta}. \quad (9)$$

And for $\theta = 1$, it is equal to:

$$\log(\mu - c) - \frac{\sigma^2}{2(\mu - c)^2} \geq \log(S). \quad (10)$$

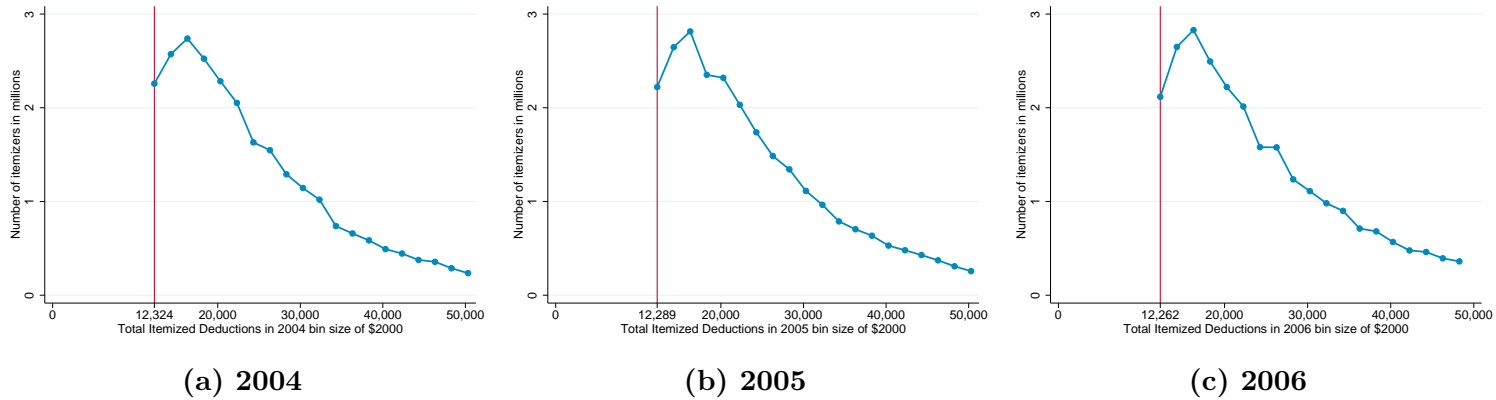
The first term in equation 10 is the expected benefit that the taxpayer derives

from itemizing. The second term is a correction for the risk aversion of the taxpayer: she will itemize deductions if the benefit of itemizing corrected for her risk aversion is greater than the benefit she derives from itemizing. Holt and Laury (2002) find a θ that ranges between -0.95 and 1.37. I assume here that $\theta = 1$ but also consider $0 < \theta \leq 2^{26}$ in table I.5. I fix the standard deduction at \$10,000 for joint filers. The cost estimated by the IRS of the time required to itemize deductions is $c = 149$. I can calculate a lower bound on the standard deviation of the taxpayer's beliefs over τ (σ). Using these parameters, I find that for rational inattention to explain the magnitude of the forgone benefits, the standard deviation of after tax deductions σ has to be greater than \$1,814 (which corresponds to \$6,479 worth of deductions with a 28% marginal tax rate). This means that the taxpayer has a range of uncertainty of deductions of more than \$6,479. This implies very high uncertainty in the beliefs of the benefits that the taxpayer can save from itemizing which is unlikely given that deductions are relatively stable from year to year as they are mostly constituted of mortgage payments and state taxes and are the results of active decisions. If a taxpayer's total deductions were to increase or decrease dramatically, she would most likely know about it because it would be due to for example to large income variations, the take up of a mortgage etc. which are salient.

If I assume a standard deviation of $\sigma = 200$ – which corresponds to a standard deviation of deductions of \$714 – then rational inattention with $\theta = 1$ predicts that taxpayers would claim the standard deduction up to total deductions of \$10,557 and forgo an average of \$557 worth of deductions, i.e., \$156 of after tax dollars given a cost $c = \$149$. With reasonable parameters, rational inattention predicts that taxpayers will forgo an additional \$7 in excess of the cost of \$149.

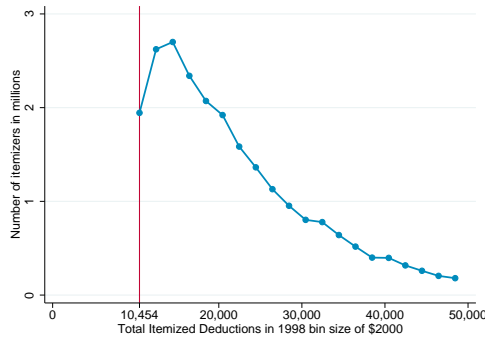
²⁶Negative values of θ are not considered because they imply risk lovingness and would trivially reject rational inattention.

Figure H.5: Missing Mass Just Above the Standard Deduction 2004-2006 (Joint Filers)

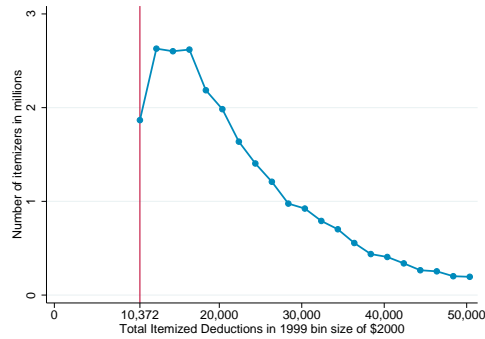


Notes: The figures above plot the density of deductions for itemizers filing jointly. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year.

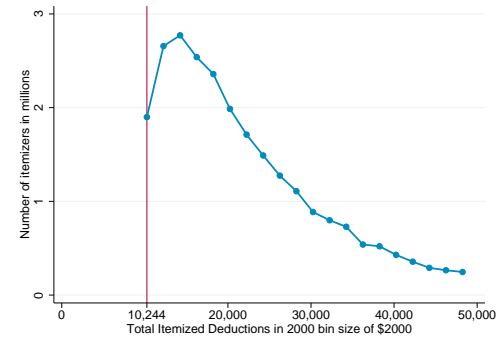
Figure H.6: Missing Mass Just Above the Standard Deduction 1998-2003 (Joint Filers)



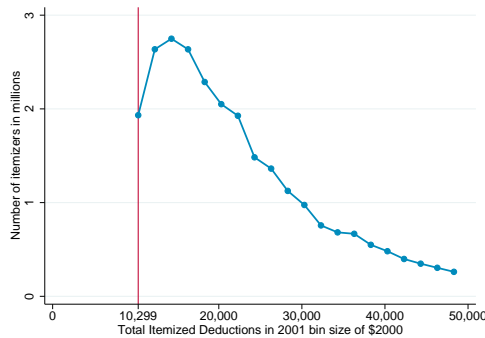
(a) 1998



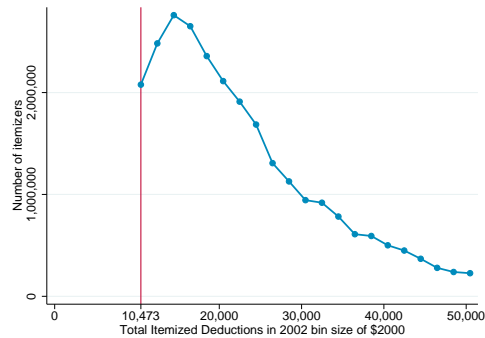
(b) 1999



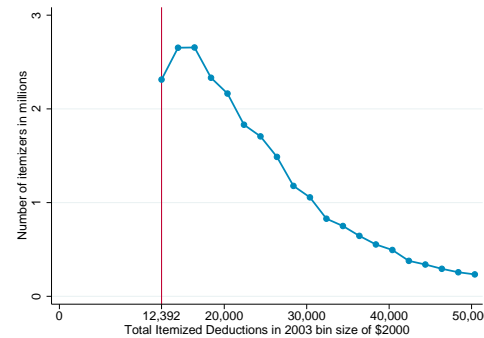
(c) 2000



(d) 2001



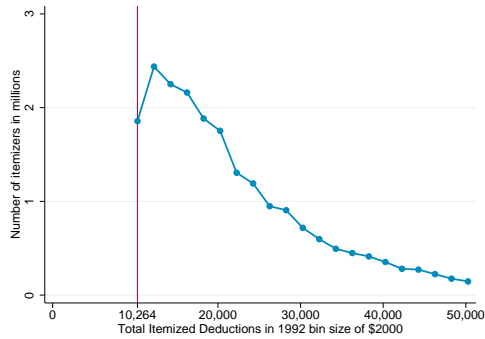
(e) 2002



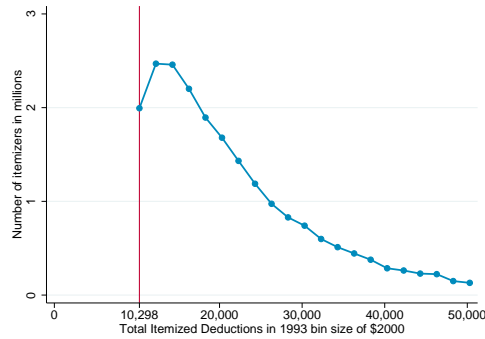
(f) 2003

Notes: The figures above plot the density of deductions for itemizers filing jointly. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year.

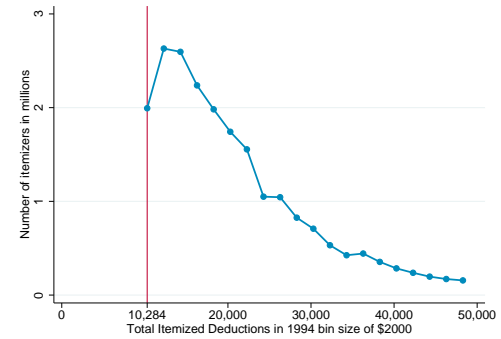
Figure H.7: Missing Mass Just Above the Standard Deduction 1992-1997 (Joint Filers)



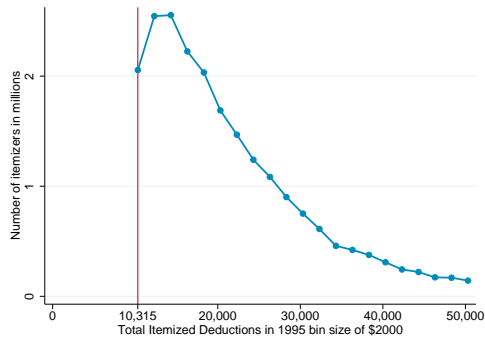
(a) 1992



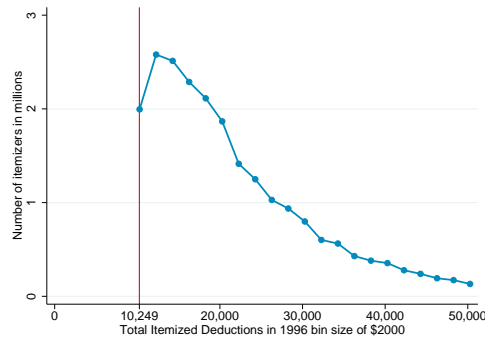
(b) 1993



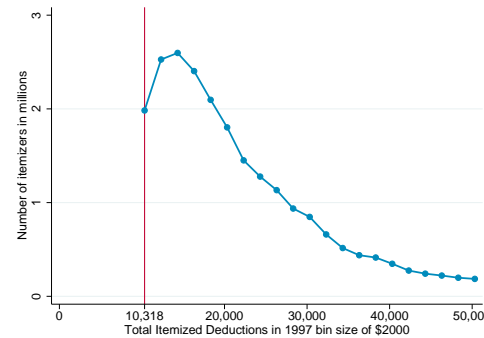
(c) 1994



(d) 1995



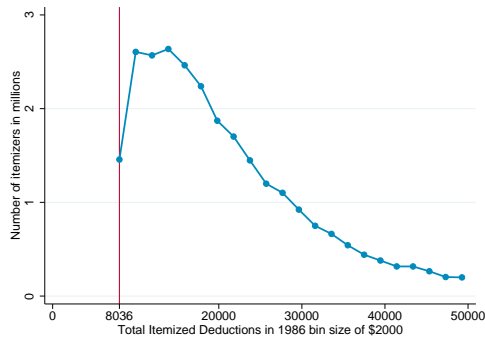
(e) 1996



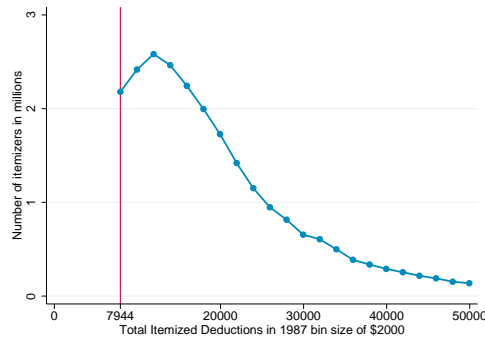
(f) 1997

Notes: The figures above plot the density of deductions for itemizers filing jointly. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year.

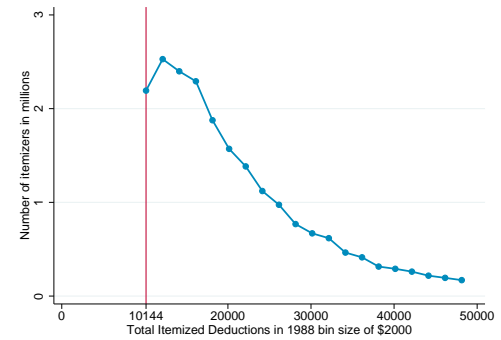
Figure H.8: Missing Mass Just Above the Standard Deduction 1986-1991 (Joint Filers)



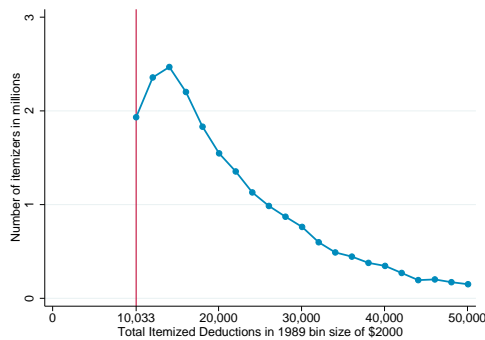
(a) 1986



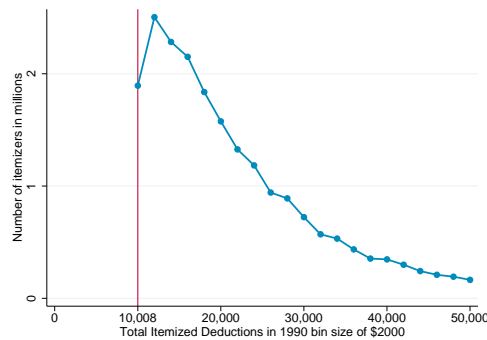
(b) 1987



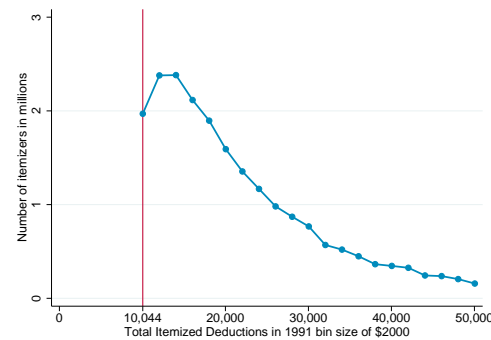
(c) 1988



(d) 1989



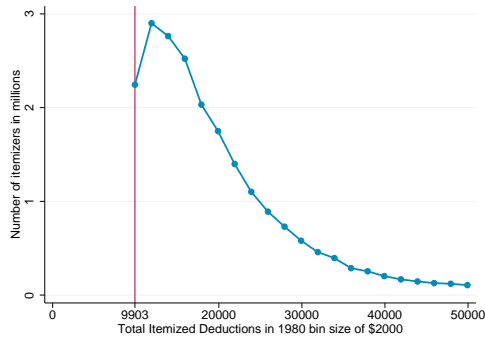
(e) 1990



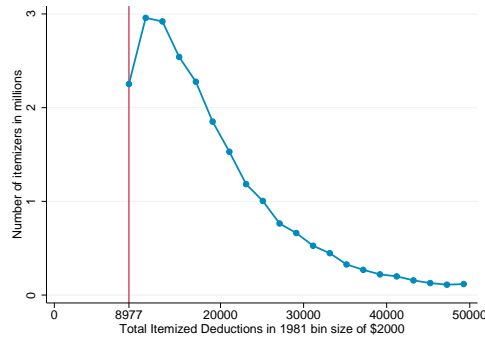
(f) 1991

Notes: The figures above plot the density of deductions for itemizers filing jointly. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year.

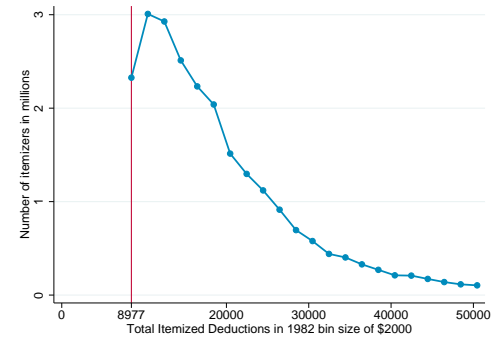
Figure H.9: Missing Mass Just Above the Standard Deduction 1980-1985 (Joint Filers)



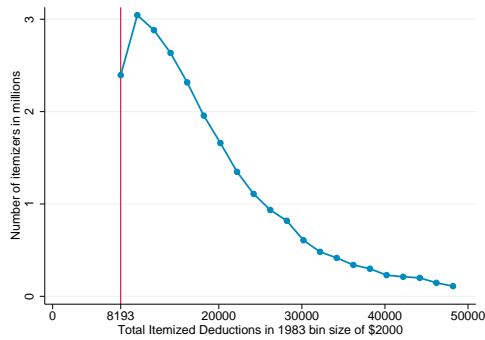
(a) 1980



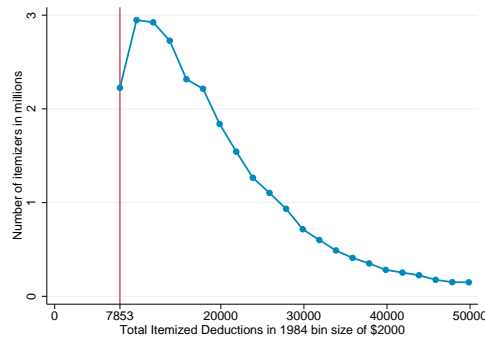
(b) 1981



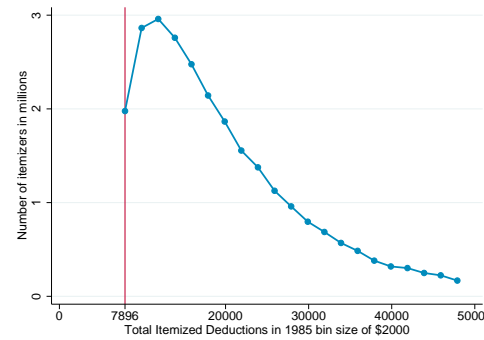
(c) 1982



(d) 1983



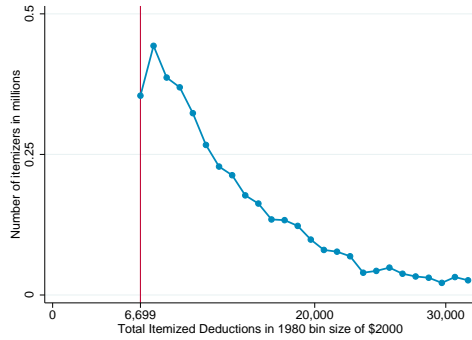
(e) 1984



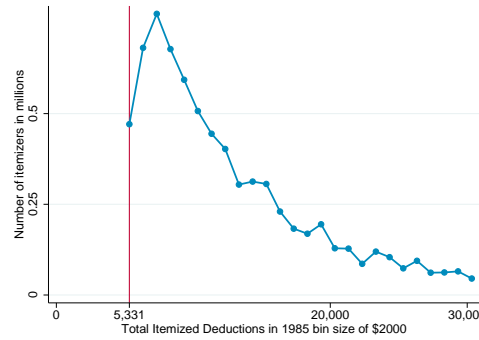
(f) 1985

Notes: The figures above plot the density of deductions for itemizers filing jointly. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year.

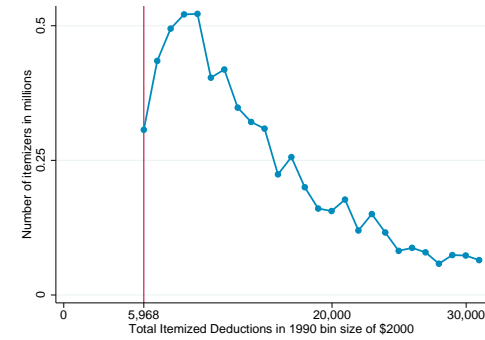
Figure H.10: Missing Mass Just Above the Standard Deduction (Single Filers)



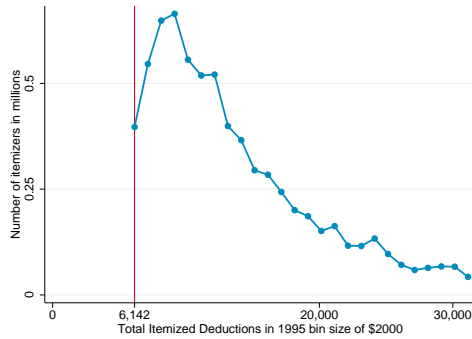
(a) 1980



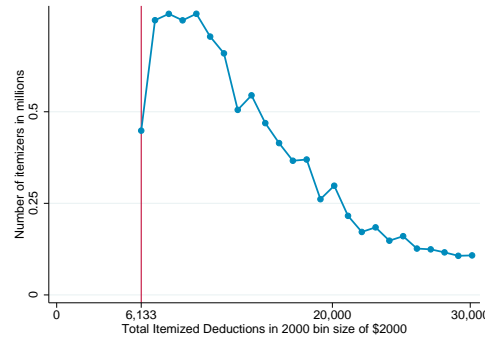
(b) 1985



(c) 1990



(d) 1995



(e) 2000

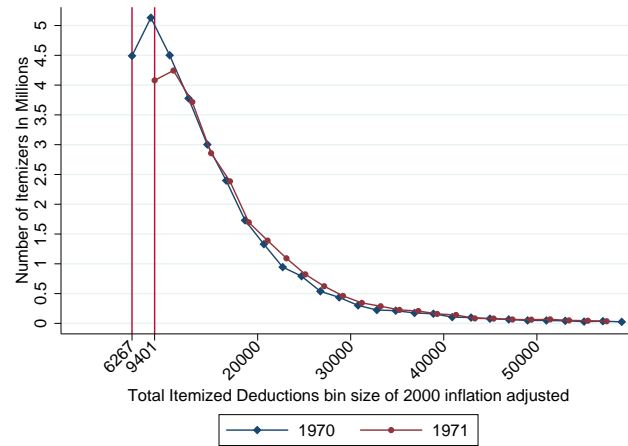


(f) 2005

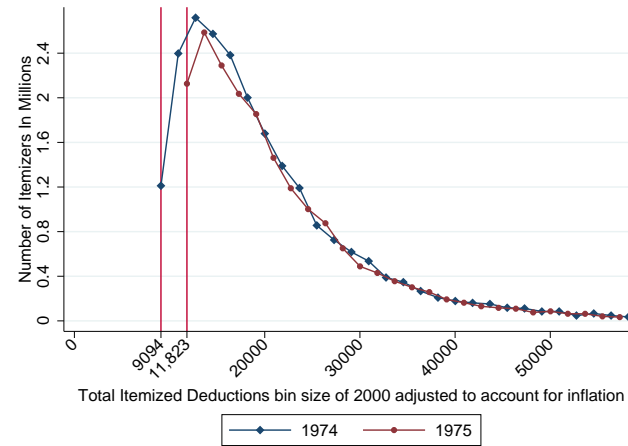
Notes: The figures above plot the density of deductions for single filers who itemize deductions. The bin size is \$2,000 and the vertical line represents the standard deduction threshold for each year.

Figure H.11: Reduced Form Evidence of the Existence of Compliance Costs

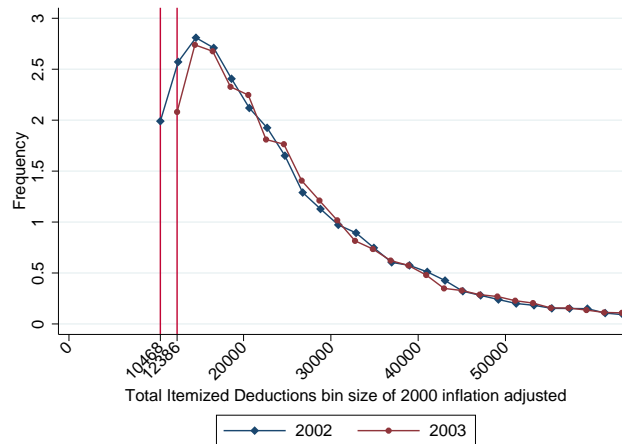
(a) 1970-1971 Comparison



(b) 1974-1975 Comparison

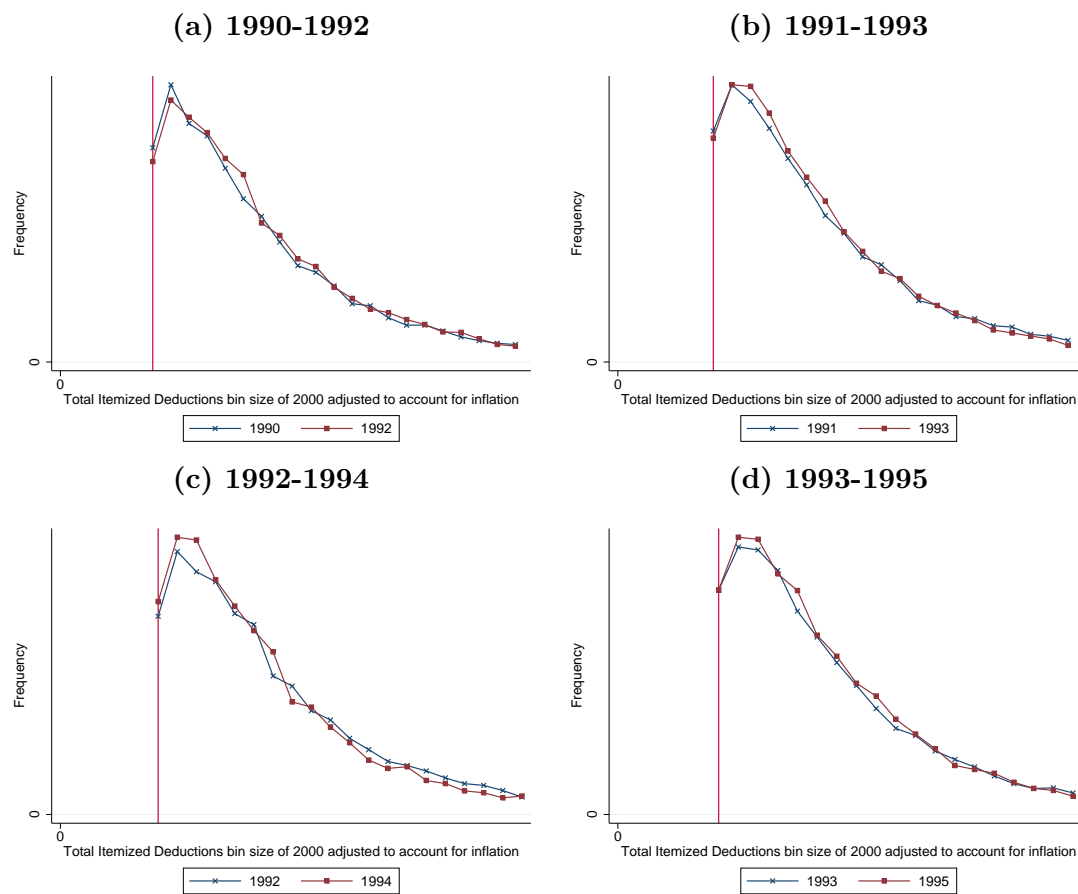


(c) 2002-2003 Comparison



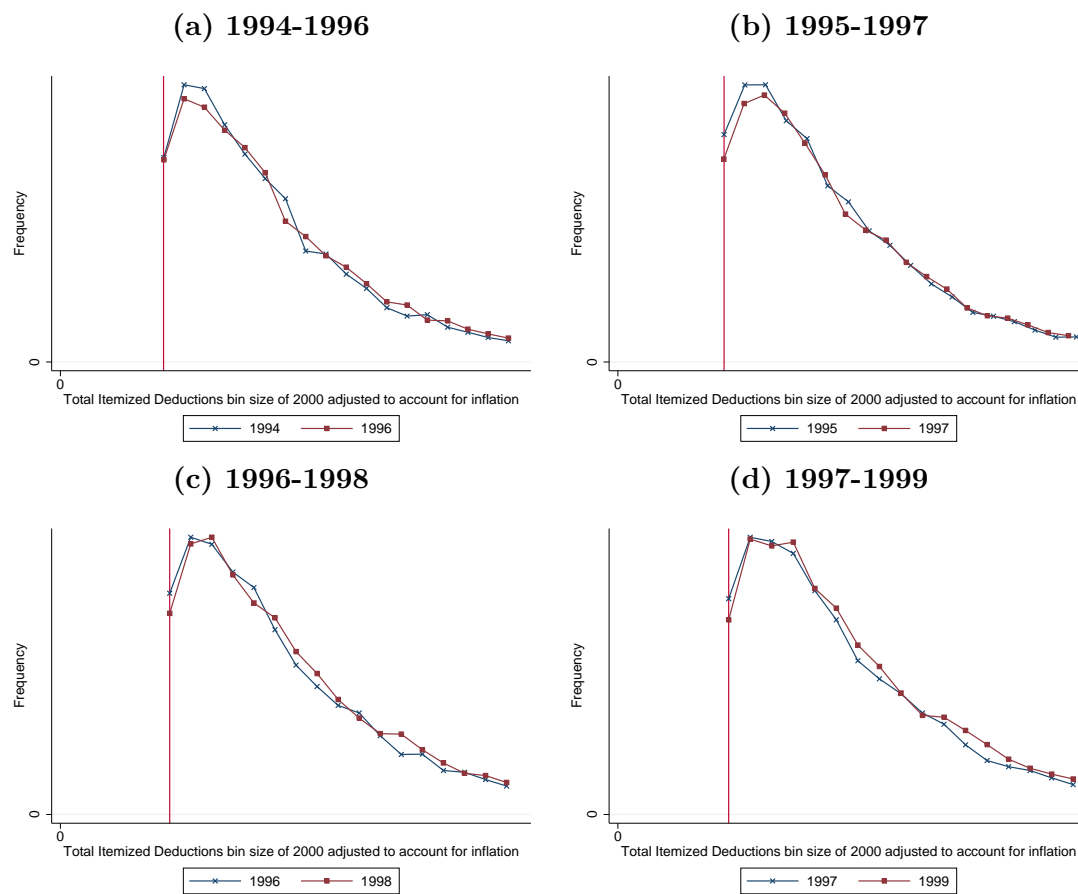
Notes: These graph plot the density of deductions before and at the time of the 1971, 1975 and 2003 reforms. While these show reduced form evidence of the existence of compliance costs, they do not provide accurate estimates of these compliance costs because other changes occurred at the same time.

Figure H.12: Placebo Test: Overlapping Densities In Years With No Reforms



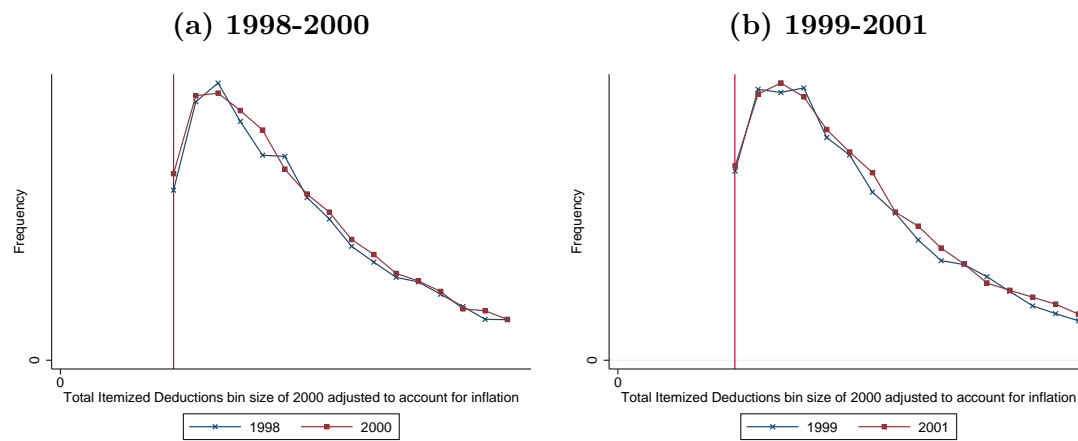
Notes: The figures above test assumption A1 which states the cost of itemizing does not vary from year to year.

Figure H.13: Placebo Test: Overlapping Densities In Years With No Reforms



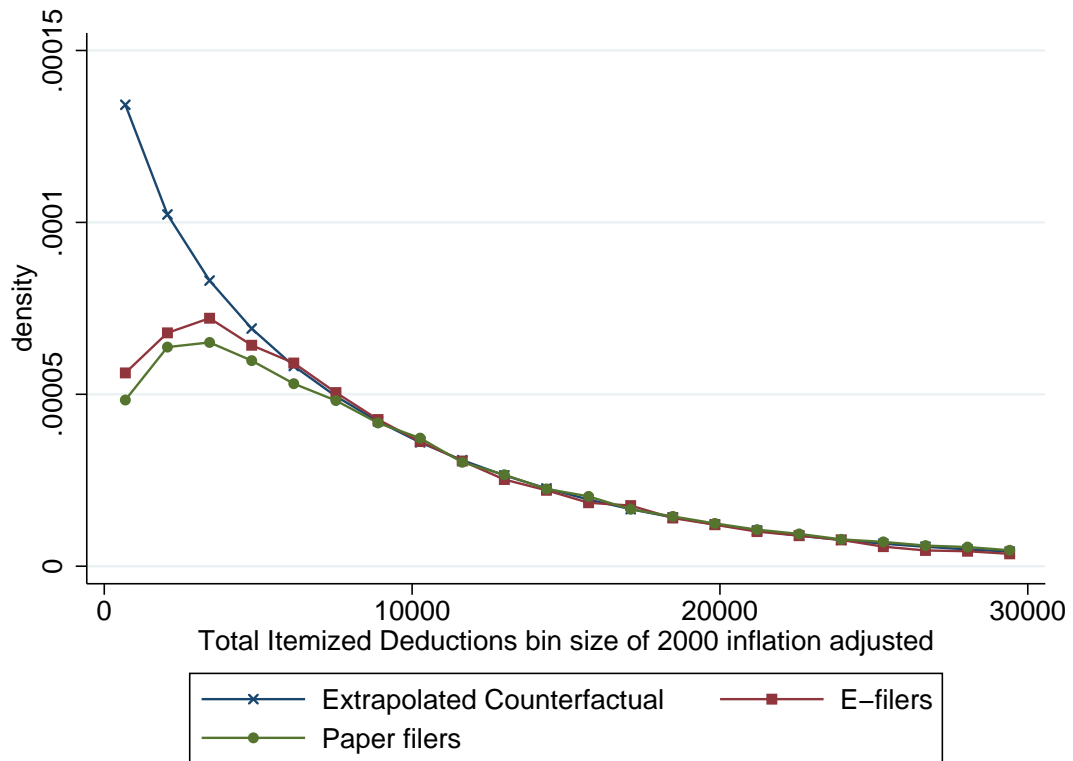
Notes: The figures above test assumption A1 which states the cost of itemizing does not vary from year to year.

Figure H.14: Placebo Test: Overlapping Densities In Years With No Reforms



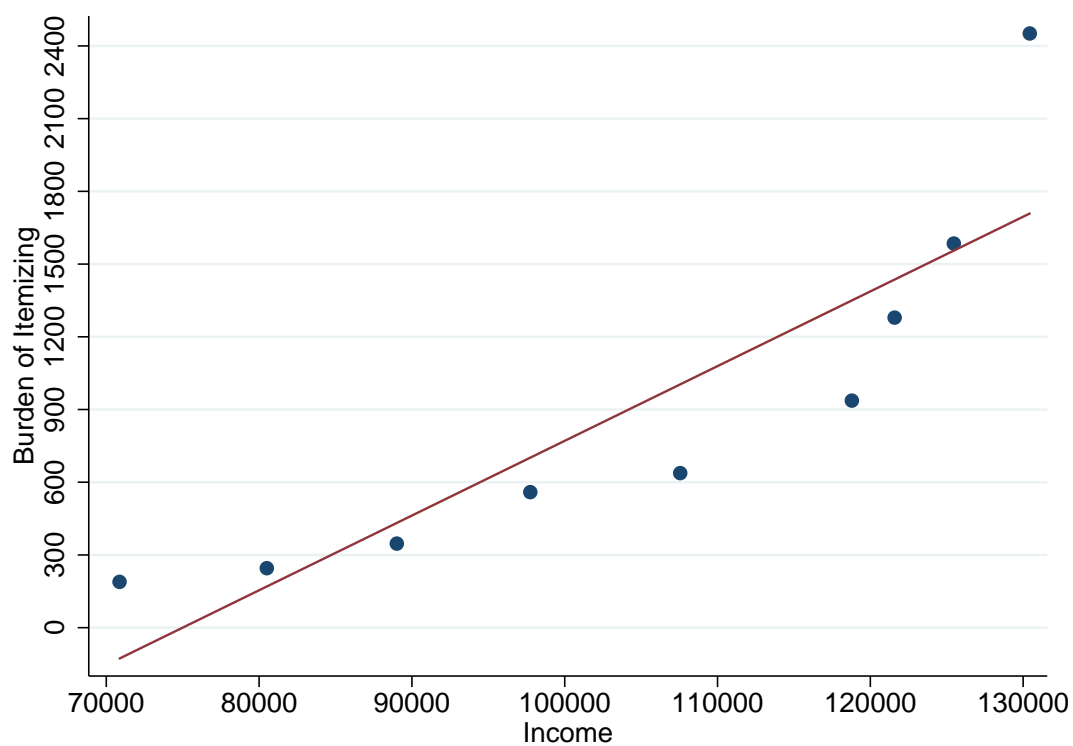
Notes: The figures above test assumption A1 which states the cost of itemizing does not vary from year to year.

Figure H.15: Effect of Electronic Filing on Cost



Notes: This graph pools all cross sections from 1998 to 2006 for joint filers and plots the distribution of itemizers using electronic filing and paper filing. It uses the area away from the standard deduction to extrapolate the shape of the counterfactual distribution of itemizers just above the standard deduction.

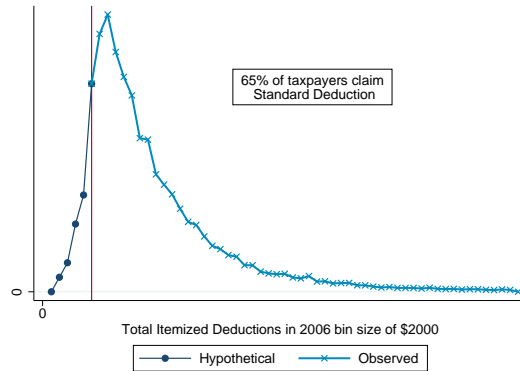
Figure H.16: Forgone Benefits Increase With Income



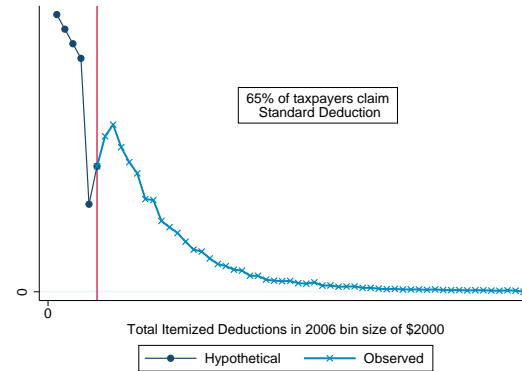
Notes: This graph plots the relationship between forgone benefits and income for all income deciles.

Figure H.17: Different Scenarios Below the Standard Deduction

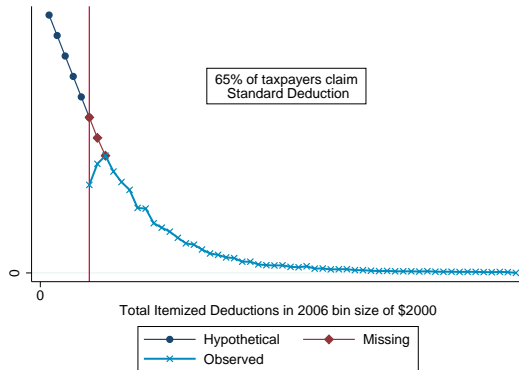
(a) Increasing: Impossible



(b) Double Peaked: Unlikely

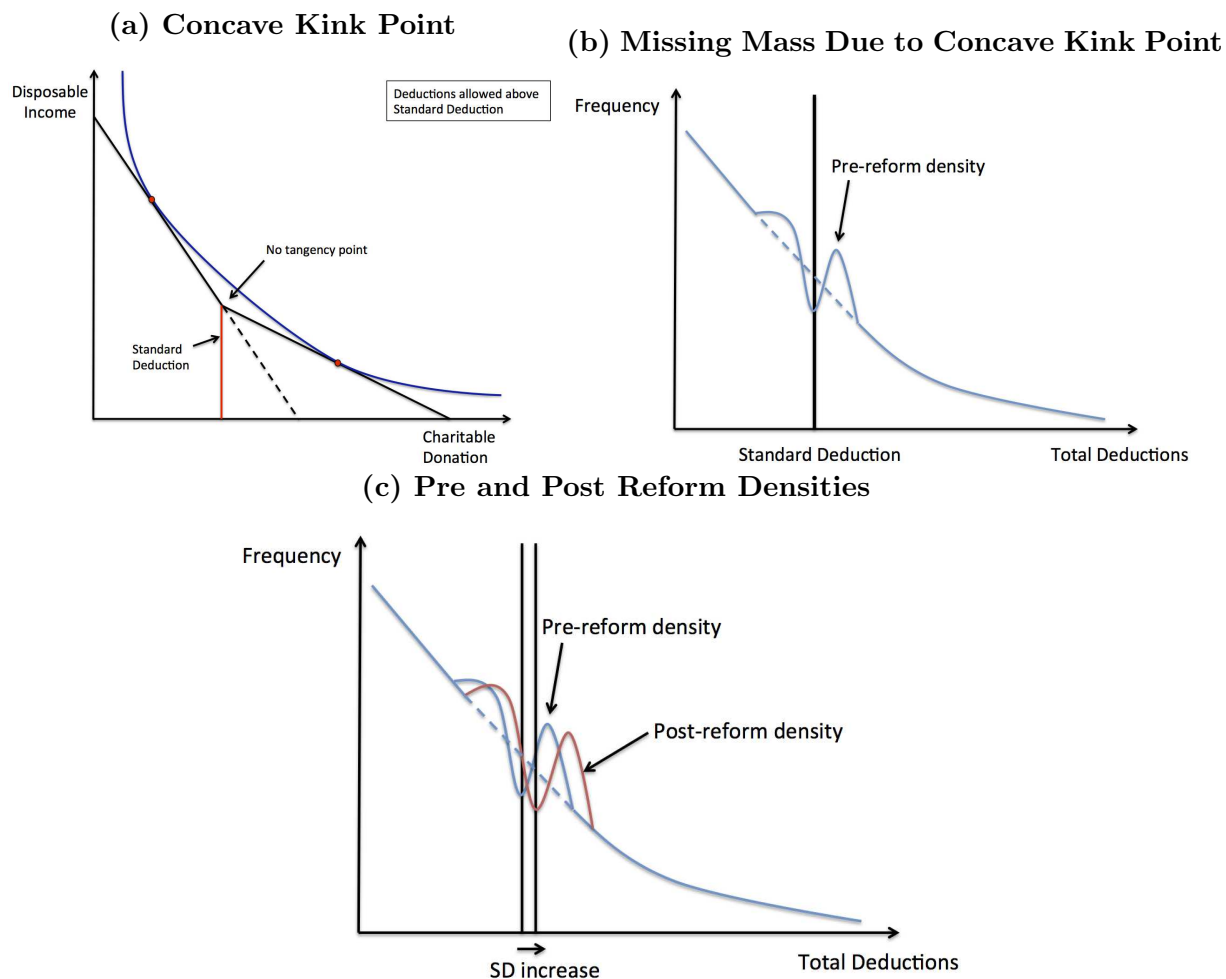


(c) Missing Mass



Notes: The graphs above plot the different scenarios that could be happening below the standard deduction. Graph (a) assumes that the density is strictly increasing, which is impossible given that 65% of taxpayers claim the standard deduction. This scenario would fail to account for most of the population of taxpayers. Graph (b) accounts for most of the population and is continuous at the standard deduction but the density is double peaked. This is possible but unlikely given that densities are usually single peaked. This however does not rule out densities that are double-peaked *because of the standard deduction*. Graph (c) assumes that there is a discontinuity at the standard deduction threshold because of compliance costs creating a missing mass.

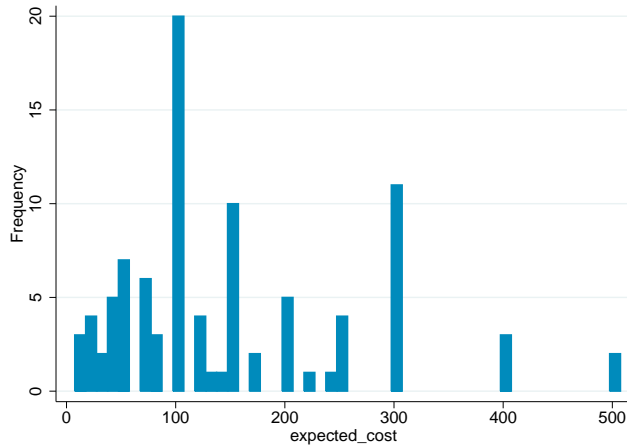
Figure H.18: Concave Kink Point: Densities Following Reform Should Not Overlap



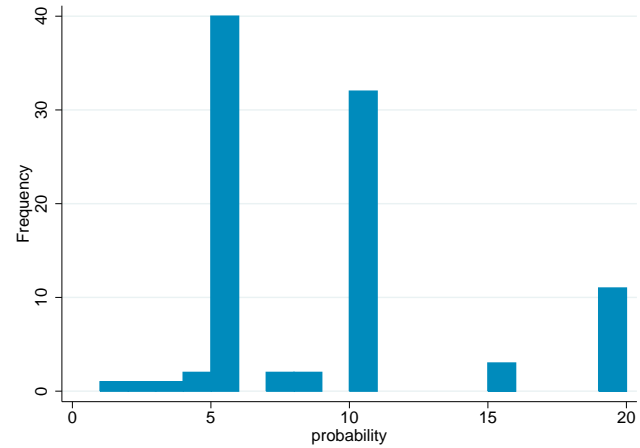
Notes: Panel (a) displays a budget set with a concave kink point. Panel (b) shows the effect that a concave kink point could in theory have on the density of itemizers. Panel (c) shows that if itemizers were responding to the concave kink point, we should observe that the pre and post reform densities are not overlapping just above the standard deduction. This is contradicted by figure 2a.

Figure H.19: Audit Survey

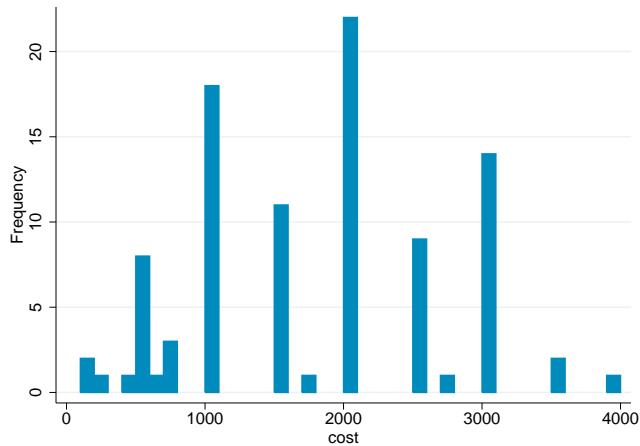
(a) Expected Cost of Audit



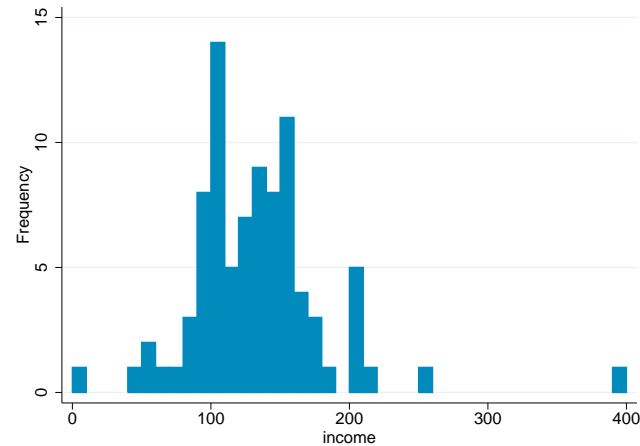
(b) Audit Probability



(c) Cost of Audit

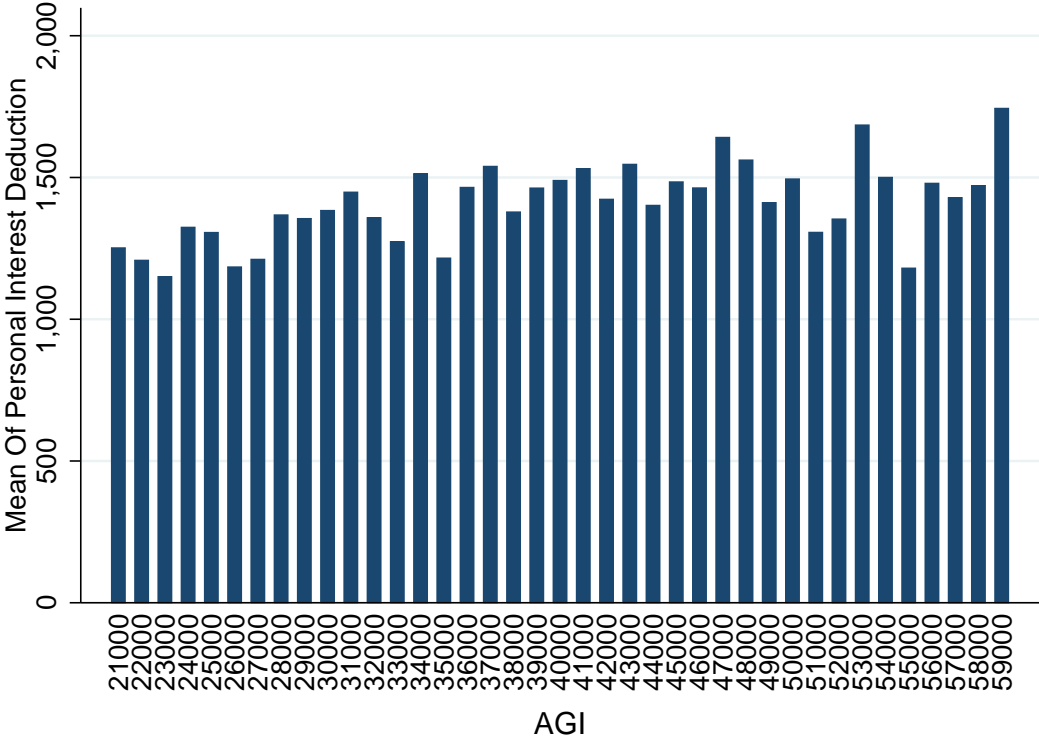


(d) Income (in \$1,000)



Notes: The number of observations for each panel is 95 individuals. Panel (a) is the distribution of expected cost of audit and is equal to the product of audit probabilities by cost of audit. Panel (b) is the distribution of perceived audit probabilities. Panel (c) is the distribution of cost of audit. Panel (d) is household income in brackets of \$1,000. 195 individuals were surveyed, of which 95 files their taxes themselves and itemize deductions.

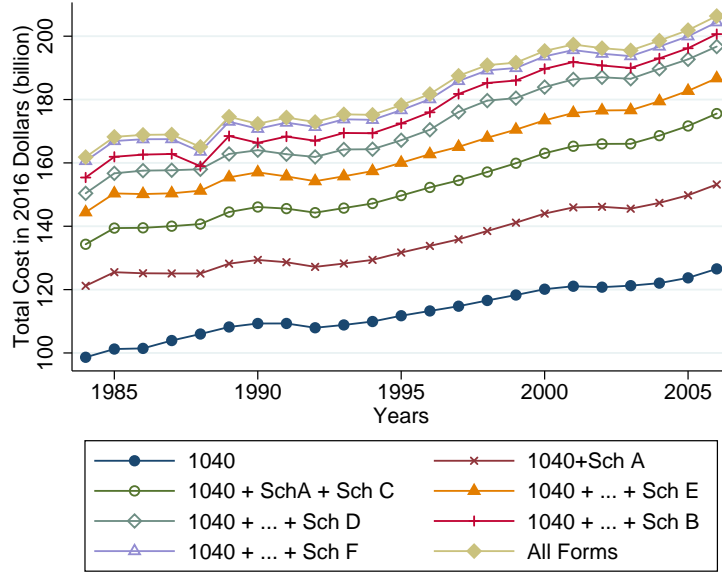
Figure H.20: No Behavioral Response For Personal Interest Deduction



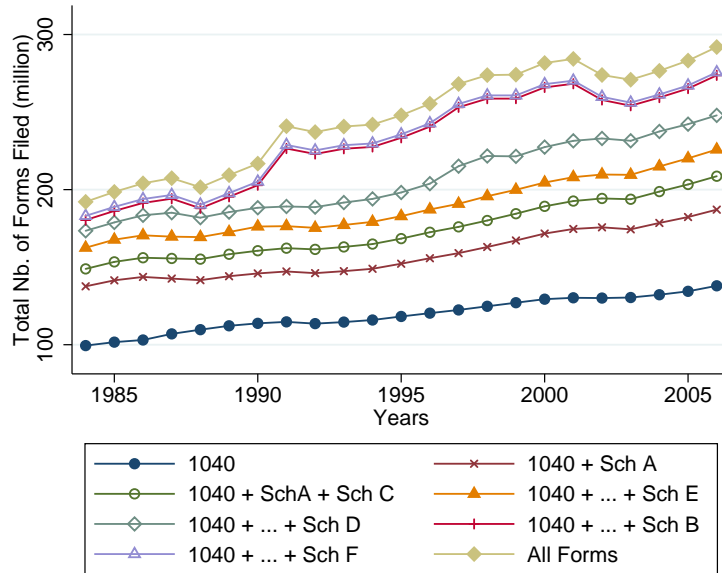
Notes: This figure plots the average personal interest deduction claimed by income bins of \$1000 in 1989. Below \$30,950, the marginal tax rate is 15% for married filing jointly and above it is equal to 28%. If taxpayers were responding to tax incentives when claiming the personal interest deduction, one would observe a discontinuity at the MTR threshold. None is observed here.

Figure H.21: Cost Trends

(a) Total Costs



(b) Number of Forms Filed



Notes: The first figure plots the cost of filing each schedule for the total US population over time as estimated in equation (7). The second figure plots the total number of forms filed over time. Each curve is cumulative: it incrementally adds each schedule to the previous curve.

I APPENDIX TABLES

Table I.2: Standard Deduction By Year For Joint Filers

Year	Standard deduction	S.D. in 2014 \$	Growth Rate	Year	Standard deduction	S.D. in 2014 \$	Growth Rate
1961	1000	7968	0.00%	1984	3400	7796	0.00%
1962	1000	7889	0.00%	1985	3540	7838	4.12%
1963	1000	7786	0.00%	1986	3670	7978	3.67%
1964	1000	7686	0.00%	1987	3760	7886	2.45%
1965	1000	7564	0.00%	1988	5000	10070	32.98%
1966	1000	7353	0.00%	1989	5200	9991	4.00%
1967	1000	7133	0.00%	1990	5450	9935	4.81%
1968	1000	6846	0.00%	1991	5700	9971	4.59%
1969	1000	6492	0.00%	1992	6000	10189	5.26%
1970	1000	6140	0.00%	1993	6200	10223	3.33%
1971	1500	8824	50.00%	1994	6350	10208	2.42%
1972	2000	11400	33.33%	1995	6550	10240	3.15%
1973	2000	10732	0.00%	1996	6700	10174	2.29%
1974	2000	9665	0.00%	1997	6900	10243	2.99%
1975	2600	11514	30.00%	1998	7100	10378	2.90%
1976	2800	11724	0.08%	1999	7200	10293	1.41%
1977	3200	12580	0.14%	2000	7350	10169	2.08%
1978	3200	11693	0.00%	2001	7600	10515	3.40%
1979	3400	11158	0.06%	2002	7850	10560	3.29%
1980	3400	9831	0.00%	2003	9500	12301	21.02%
1981	3400	8911	0.00%	2004	9700	12234	2.11%
1982	3400	8394	0.00%	2005	10000	12199	3.09%
1983	3400	8133	0.00%	2006	10300	12173	3.00%

Notes: The table shows the standard deduction amounts from 1961 to 2006 for joint filers and its growth rate. The years that I use to identify the cost of itemizing deductions are in bold.

Table I.3: Other Tax Schedules and Demographics

Variable	Cost Coefficient
β_{1040}	$2.08\beta_A$
β_B	$0.28\beta_A$
β_C	$2.13\beta_A$
β_D	$0.83\beta_A$
β_E	$1.29\beta_A$
β_F	$3.55\beta_A$
β_{SE}	$0.25\beta_A$
$\overline{\alpha_{dep}}$	0.99
α_{dep}	1.01
$\overline{\alpha_{efi}}$	1.07
α_{efi}	0.93
$\overline{\alpha_{prep}}$	0.99
α_{prep}	1.01
α_1	0.21
α_2	0.21
α_3	0.27
α_4	0.38
α_5	0.61
α_6	0.99
α_7	1.4
α_8	1.74
α_9	2.7

Notes: This table shows the estimates used in equations (6) and (7). β_{1040} , β_B , β_C , β_D , β_E , β_F and β_{SE} are estimated in section C.1. Section C explains how α_{dep} , α_{efi} and α_{prep} are estimated. Section 4.1 explains how α_i , $i = 1, \dots, 10$ are estimated.

Table I.4: Standard Errors of the Difference Between the 1987 and 1989 Densities (figure 2a)

Bin	Deduction Range	Difference	Standard Errors	z-stat
1	[9991, 11991]	0.00311***	0.00047	6.55
2	(11991, 13991]	0.00190***	0.00044	3.47
3	(13991, 15991]	0.00000	0.00040	0.02
4	(15991, 17991]	-0.00047	0.00041	-1.13
5	(17991, 19991]	0.00022	0.00038	0.59
6	(19991, 21991]	-0.00010	0.00033	-0.31
7	(21991, 23991]	-0.00041	0.00028	-1.45
8	(23991, 25991]	-0.00042	0.00025	-1.67
9	(25991, 27991]	-0.00032	0.00020	-1.60
10	(27991, 29991]	-0.00042**	0.00018	-2.24

Notes: This table shows the bootstrapped standard errors for the difference between bins in figure 2a * denotes significance at the 10% level, ** at the 5% level and *** at the 1% level. I use 100 replications for the bootstrap estimation.

Table I.5: Calibration of Rational Inattention Model

CRRA coefficient	Precision of Beliefs About Level of Savings (σ)							
	10	50	100	200	500	1000	2000	3000
0.1	0	0	0	1	5	28	70	152
0.25	0	0	0	2	11	44	167	203
0.5	0	0	1	4	22	86	64	625
0.8	0	0	1	5	35	134	462	880
1	0	1	2	7	44	164	547	1015
1.1	0	1	2	8	48	179	586	1074
1.25	0	1	2	9	54	200	640	1153
1.5	0	1	3	11	64	233	718	1262
1.8	0	1	3	13	76	270	799	1364
2	0	1	4	14	84	293	844	1417

Notes: This table shows the results of a calibration of the rational inattention model derived in section 5.4.

Table I.6: Standard Errors of the Difference Between the 1970 and 1971 Densities (figure H.11a)

Bin	Deduction Range	Difference	Standard Errors	z-stat
1	[6140, 9140]	0.00373***	0.00102	3.64
2	(9140, 12140]	0.00288***	0.00090	3.20
3	(12140, 15140]	0.00307***	0.00074	4.11
4	(15140, 18140]	0.00083*	0.00046	1.81
5	(18140, 21140]	0.00019	0.00037	0.54
6	(21140, 24140]	0.00039	0.00027	1.45
7	(24140, 27140]	-0.00025	0.00018	-1.41
8	(27140, 30140]	-0.00001	0.00015	-0.09
9	(30140, 33140]	-0.00007	0.00011	-0.63
10	(33140, 36140]	-0.00010	0.00010	-0.94

Notes: This table shows the bootstrapped standard errors for the difference between bins in 1970 and 1971 for taxpayers with deductions below \$30,000. * denotes significance at the 10% level, ** at the 5% level and *** at the 1% level. I use 100 replications for the bootstrap estimation.

Table I.7: Standard Errors of the Difference Between the Density of Electronic Filers v.s. Paper Filers (Figure 4c)

Bin	Deduction Range	Difference	Standard Errors	z-stat
1	[0, 2000)	7.08e-06***	1.44e-06	4.92
2	[2000, 4000)	3.02e-06*	1.55e-06	1.95
3	[4000, 6000)	5.91e-06***	1.39e-06	4.25
4	[6000, 8000)	3.44e-06**	1.54e-06	2.23
5	[8000, 10000)	5.10e-06***	1.49e-06	3.42
6	[10000, 12000)	1.47e-06	1.41e-06	1.04
7	[12000, 14000)	2.37e-07	1.42e-06	0.17
8	[14000, 16000)	-1.73e-06	1.18e-06	-1.47
9	[16000, 18000)	-1.93e-07	1.04e-06	-0.19
10	[20000, 22000)	-1.88e-06*	1.03e-06	-1.82

Table I.8: Survey Based Estimates of the Compliance Costs of Taxation in the US

Article	Methodology	Cost of Itemizing Deductions	Aggregate Costs of Filing Taxes
Wicks (1965) and Wicks and Killworth (1967)	Survey of Montana residents	Not reported	32% of state and 11.5% of federal tax revenue
Slemrod and Sorum (1984)	Survey of 2000 Minnesota residents	Not reported	5% to 7% of total tax revenue
Little (1988), Commissioned by IRS	Two separate surveys of 750 and 6200 taxpayers	Not reported	1.59 billion hours
Slemrod (1989)	Estimate structural model based on survey of 2000 Minnesota residents	3.2 to 3.5 hours	Not reported
Blumenthal and Slemrod (1992)	Survey of 2000 Minnesota households in 1990	9 hours	85 billion dollars
Guyton et al. (2003)	Survey and ITBM* simulations	9.9 hours	18.7 billion hours dollars

Notes: This table reports the results of several research article documenting the cost of tax filing using survey evidence. *ITBM stands for the Individual Tax Burden Model.

Table I.9: Articles Documenting Low Take-Up Rates/Large Forgone Benefits

Article	Setting	Forgone Benefits
Steuerle et al. (1978)	Tax Benefits/Income Averaging	\$666
Blank and Card (1991)	Unemployment Insurance Benefits	Take-up rate of less than 30% of eligible unemployed individuals
Madrian and Shea (2001)	Retirement Savings	50% match of retirement savings up to 6% of contributions
Sydnor (2010)	Home Insurance	Five times the insurance premium
Bhargava and Manoli (2015)	Taxes	Earned Income Tax Credit Benefits
Handel (2013)	Health Insurance	\$2,032 per year
Keys et al. (2014)	Mortgage Refinancing	Present discounted cost of \$11,500

Table I.10: IRS Hourly Cost Estimates

Form	Recordkeeping	Learning about the law or the form	Preparing the form	Copying, assembling and sending the form to the IRS	Total
1040	3 hrs., 7 min.	2 hrs., 32 min.	3 hrs., 10 min.	35 min.	9hrs., 24 min.
Sch. A	2 hrs., 47 min.	26 min.	1 hr., 1 min.	20 min.	4 hrs., 34 min.
Sch. B	33 min.	8 min.	16 min.	20 min.	1 hr., 17 min.
Sch. C	6 hrs., 13 min.	1 hr., 4 min.	1 hr., 56 min.	25 min.	9 hrs., 38 min.
Sch. D	1 hr., 2 min.	1 hr.	1 hr., 8 min.	35 min.	3 hrs., 45 min.
Sch. D-1	13 min.	1 min.	13 min.	35 min.	1 hr., 2 min.
Sch. E	2 hr., 52 min.	1 hr., 7 min.	1 hr., 16 min.	35 min.	5 hrs., 50 min.
Sch. F	9 hr., 41 min.	1 hr., 59 min.	3 hr., 52 min.	35 min.	16 hrs., 7 min.
Sch. R	20 min.	15 min.	22 min.	35 min.	1 hr., 32 min.
Sch. SE short	20 min.	11 min.	13 min.	14 min.	58 min.
Sch. SE long	26 min.	22 min.	37 min.	20 min.	1 hr., 45 min.

Notes: Each cell of this table is an estimate of the time it takes to perform each task associated with each tax schedule. They are based on IRS surveys of taxpayers at the time of filing and are reported in the 1040 instructions (on page 3 in 1989). There is no information on Sch. R in the SOI public use files so its cost is not estimated in this paper.