

2014 National Income Tax Workbook Style Sheet

(Copy editor: *Please enter new words alphabetically in consistency list.*)

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The following material is generally based on the Chicago Manual of Style, 16th edition, which should be consulted for issues not covered in this style sheet.

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ABBREVIATIONS

1. Spell out names of states following a city, except in tables and mailing addresses (Madison, Wisconsin).
2. Close space between initials for first and middle names of people (e.g., I.M. Smith is a cash-basis taxpayer. For the 2008 tax year, I.M. earned \$56,400 in his business.)
3. *e.g.*, *i.e.*, and *etc.* are used only in tables or within parentheses (in text, substitute *for example* for *e.g.*; *that is* for *i.e.*; and *and so forth* or *and the like* for *etc.*).
4. Italicize all: *aff'd*, *aff'g*, *rev'g*, *rem'g* (**these are contractions**).
5. Do not italicize the abbreviation *et seq.* (used in code references).
6. Most acronyms and abbreviations (initialisms) should be introduced (spelled out) at first occurrence in a chapter; an introduction looks like this: "the League of Women Voters (LWV)."
 - a. Do not include acronyms or abbreviations in a heading unless introduced previously in the chapter.
 - b. Spelling out the term is **not** necessary if the term is **easily recognizable by Taxbook users** (tax professionals).
 - c. Common initialisms that should not be spelled out are specifically identified in the following list. (These are repeated in the consistency list near the end of this style sheet.)
 - d. Most initialisms do not require periods after each letter; those that do are also specifically identified in the following list.

ACRS (accelerated cost recovery system)

AGI (adjusted gross income)

A.M. (advice memorandum; with periods; use abbreviation in citation only)

C.B. (cumulative bulletin; with periods; use abbreviation in citation only)

CPA (certified public accountant; do not introduce by spelling out)

DPGR (domestic production gross receipts)

EIC (earned income credit; generally do not introduce by spelling out)

EIN (employer identification number)

FICA (Federal Insurance Contributions Act; do not introduce by spelling out)

FMV (fair market value)

FUTA (Federal Unemployment Tax Act; do not introduce by spelling out)

IRA (individual retirement account)

I.R.B. (Internal Revenue Bulletin; with periods; use abbreviation in citation only)

I.R.C. (Internal Revenue Code; with periods; use abbreviation in citation only)

I.R.M. (Internal Revenue Manual, do not spell out in text)

IRS (Internal Revenue Service; do not introduce by spelling out)

LLC (limited liability company)

MACRS (modified accelerated cost recovery system; do not introduce by spelling out)

MAGI (modified adjusted gross income)

MFJ (married filing jointly)

MFS (married filing separately)

MSB (money services business)

SEP (simplified employee pension)

SIMPLE (savings incentive match plan for employees; do not introduce by spelling out)

SSN (social security number)

SUV (sport utility vehicle)

T.A.M. (technical advice memorandum; with periods; use abbreviation in citation only)

T.C. Memo. (*not* T.C.M.; with periods, including a period after *Memo.*)

TIN (taxpayer identification number)

BOXED NOTES

Practitioner Note

A practitioner note is an additional comment about or explanation of tax law that does not flow directly in the text but gives additional information to the reader that is related to the text. It is used when a footnote would commonly be used.

For example, the following paragraph explained a change in the requirement to allocate expenses when calculating QPAI. The Practitioner Note that follows makes a related point that does not flow directly in the text.

Notice 2005-14 required QPAI to be determined on an item-by-item basis, rather than on a division-by-division, a product-line-by-product-line, or a transaction-by-transaction basis. That meant the taxpayer had to allocate gross receipts and expenses among each item it produced. The taxpayer's QPAI was the sum of the QPAI derived by the taxpayer from each item, and QPAI from each item could be positive or negative. The final regulations omitted this requirement. **Therefore, taxpayers are not required to allocate receipts and expenses among different qualifying items.** If an expense is incurred for more than one qualifying item, that expense can be deducted from the taxpayer's DPGR without allocating it among the qualifying items.

Practitioner Note

Item-by-Item Test Still Applies to DPGR Determination

The final regulations require the test of whether receipts are DPGR to be applied on an item-by-item basis [Treas. Reg. § 1.19 9-3(d)(1)]. An "item" is an identifiable unit, such as a barrel of oil, a toy car, or a television set produced by the taxpayer. When the taxpayer manufactures a component of a finished product, the "item" is the component. When qualifying items produced by the taxpayer are sold in conjunction with other products or services, the DPGR relating to qualifying items must be separated from the gross receipts from non-qualifying items.

Planning Pointer

A planning pointer explains how the tax law discussed in the text can be used to the taxpayer's advantage. For example, the following planning pointer explains a way to avoid the adverse effect of a guaranteed payment on the domestic production activities deduction.

Planning Pointer

Special Allocation of Profits

Instead of making a guaranteed payment to Pete, the members of Latte, LLC could accomplish the same distribution of Latte's net revenue without reducing QPAI by making a special allocation of profits. For example, near the end of the tax year, when the members could see that there would be \$30,000 of net income to share, they could agree that Pete would get 53.33% ($\$16,000 \div \$30,000$) of the profits and Paige and Sally would each get 23.22% ($\$7,000 \div \$30,000$) of the profits. To be recognized for income tax purposes, the special allocation must have substantial economic effect. (See page 248 in the "Business Entities" chapter of this book and pages 269–271 in the "Business Entities" chapter of the *2004 National Income Tax Workbook* for a discussion of the requirements of substantial economic effect.) Therefore, Pete's capital account must reflect the extra \$9,000 of profits that are allocated to him. If the members want to maintain equal ownership, Pete could withdraw \$9,000 from his capital account to bring them back into balance.

Observation

An observation is a conclusion that is drawn from the text. For example, the following sentence explains a rule of tax law and the observation that follows the sentence explains a consequential effect.

A safe harbor permits a taxpayer with less than 5% of total gross receipts from items other than DPGR to treat all gross receipts as DPGR, with no required allocation.

Observation**No Allocation of Expenses**

By allowing all gross receipts to be treated as DPGR, the safe harbor also allows all expenses to be allocated to DPGR. That eliminates the need to allocate expenses between DPGR and non-DPGR.

Law Change

A law change is an explanation of a new tax law that is incidental to the main topic. In most instances, it is a result of legislation but could be a result of a new regulation, case, ruling or other authority. Most often it is used for a comment that would be a footnote. In some cases, the comment in the note may fit well in the text, but making it a law change draws additional attention to the comment and/or breaks up a long passage of text.

For example, if the text involves the use of the capital gains rates, a law change could be included to remind practitioners that the 5% rate drops to 0% for 2008–2010. By contrast, if the point of the text is to illustrate that the rate drops to 0% a law change would not be used unless for the purposes stated above. Use law changes sparingly so that their effect is not diluted.

Law Change**Lower Capital Gains Rate**

The capital 5% gains rate drops to 0% for 2008–2010.

Cross-Reference

A cross-reference is a reference to another place in the current or prior edition of the *National Income Tax Workbook* that gives further or related information for the topic discussed in the text.

For example, the following cross-reference was included in the discussion of stock options in the “Divorce” chapter.

Cross Reference**Investment Issues**

See Chapter 4, “Investment Issues,” in this book for an explanation of the federal income tax aspects of incentive stock options.

CAPITALIZATION

1. Acronym plural in all-cap title: use small cap for s (example: AFRs)
2. Acronym plural in text—no apostrophe (example: AFRs)
3. Chapter 3 (of Taxbook); see # 21
4. Figure 3.1 (tables should be referred to as figures, NO colon after figure number)
5. Problem 3
6. Issue 3
7. item 3
8. Example 12.7 (for Chapter 12, example number 7)
9. the “What’s New” chapter
10. the “Probate Process” section
11. Question 1
12. Answer 1
13. line 30; line 15a, “IRA distributions”

14. box 21
15. Form 4797 (followed by form name in first reference)
16. Schedule B (Form 1040) (followed by form name in first reference)
17. I.R.C. § 5112 (follow symbol with nonbreaking space between symbol and number; the keystrokes for a nonbreaking space are: Ctrl+Shift+space bar.)
18. Situation 1, Situation 2 (usually in the Rulings & Cases chapter)
19. column A
20. step 3
21. part I of subchapter J of chapter 1 of subtitle A (that is, lowercase *part*, *subchapter*, *chapter*, and *subtitle* when referring to code sections)

CITATION FORMATS (AUTHORITIES)

Citations follow Bluebook style and are included in the text in square brackets rather than in footnotes or endnotes. Include the citation within the sentence and always use square brackets even if the citation has no parenthesis.

Example: Some attribution or constructive ownership rules apply in determining ownership of partnerships or corporations [I.R.C. § 267(c)].

Court Cases

1. U.S. Supreme Court (*Cite to United States Reports, if available*)
Commissioner v. Duberstein, 363 U.S. 278 (1960)
2. Federal Court of Appeals (*Cite to the Federal Reporter, if available; do not use superscript*)
Duberstein v. Commissioner, 265 F.2d 28 (6th Cir. 1959)
Shellito v. Commissioner, 437 Fed. Appx. 665 (10th Cir. 2011)
3. Bankruptcy Court (*Cite to Bankruptcy Reporter, if available*)
In re Colsen, 311 B.R. 765 (Bankr. N.D. Iowa 2004)
4. Federal Claims Court (*Cite to Federal Claims Reporter, if available*)
B.F. Goodrich Company v. United States, 32 Fed.Cl. 571 (1995)
5. Federal District Court (*Cite to the Federal Supplement, if available*) [*Use Bluebook format (with just D. if there is only one district within the state; old post office abbreviations are used for states)*]
Davis v. United States, 71 F.Supp.2d 622 (W.D. Tex. 1999)
6. Tax Court (*Cite to the Tax Court of the United States Reports*)
Hurst v. Commissioner, 124 T.C. 16 (2005)
7. Tax Court Memorandum Decision (*Cite to Tax Court Memo.*)
Duberstein v. Commissioner, T.C. Memo. 1958-4
8. Tax Court Summary Opinion
Okula v. Commissioner, T.C. Summary Opinion 2009-13
9. All courts (*If there is no official citation, use an unofficial citation*)

In re Colsen, 94 A.F.T.R. 2d (RIA) 2004-5005 (Bankr. N.D. Iowa 2004)
In re Colsen, 2004-2 U.S.T.C. (CCH) ¶50,304 (Bankr. N.D. Iowa 2004)

10. Board of Tax Appeals

Schwinn v. Commissioner, 9 B.T.A. 1304 (1928)

Legislation, Code, and Regulations

1. Senate or House Bills

American Recovery and Reinvestment Tax Act of 2009, H.R. 1
Middle Class Opportunity Act of 2009, S. 2

2. Tax Acts *[Include abbreviation (TRHCA) or short name (Jobs Act) if there are subsequent references to the act in the text]*

Tax Relief and Health Care Act of 2006, Pub. L. No. 109-432, § 106
Tax Relief and Health Care Act of 2006 (TRHCA), Pub. L. No. 109-432, § 106

3. Internal Revenue Code *(Use two section symbols when citing multiple sections, but only one section symbol when citing multiple subsections within a single section or when “or” follows the first section reference.) (Follow § symbol with nonbreaking space. The keystrokes for a nonbreaking space are: Ctrl+Shift+space bar.)*

I.R.C. § 183(d)
I.R.C. § 183(a), (c), and (d)
I.R.C. §§ 163 and 183(d)
I.R.C. § 163 or 183

4. Treasury Decision *[Use the permanent Cumulative Bulletin (C.B.) citation if available]*

T.D. 9016, 2002-2 C.B. 628
T.D. 9016, 2002-40 I.R.B. 628

5. Final Regulation *(Follow § symbol with nonbreaking space. The keystrokes for a nonbreaking space are: Ctrl+Shift+space bar.)*

Treas. Reg. § 1.183-2(b)
Treas. Reg. § 1.408A-6, Q&A-8, 9, and 10

6. Temporary Regulation *(Follow § symbol with nonbreaking space. The keystrokes for a nonbreaking space are: Ctrl+Shift+space bar.)*

Temp. Treas. Reg. § 1.704-2T(f)(5)

7. Proposed Regulation *(Follow § symbol with nonbreaking space. The keystrokes for a nonbreaking space are: Ctrl+Shift+space bar.)*

Prop. Treas. Reg. § 1.704-1

8. Notice of Proposed Rulemaking

REG-158747-06, 2009-4 I.R.B. 362 *(if I.R.B. reference is available)*
REG-109369-10, 76 F.R. 72875 (November 28, 2011) *(if I.R.B. reference is not available)*

9. U.S. Code

21 U.S.C. § 301

10. Code of Federal Regulations

21 C.F.R. part 862, “Clinical Chemistry and Clinical Toxicology Devices”
subpart B, subpart D, or subpart E of 21 C.F.R. part 872, “Dental Devices”
29 C.F.R. § 500.20(s)(1)

IRS Published Guidance

1. Action on Decision (*Releases do not have a page number in the I.R.B.*)
Kohler v. Commissioner, T.C. Memo. 2006-152, nonacq. A.O.D. 2008-1 (March 4, 2008)
Kohler v. Commissioner, T.C. Memo. 2006-152, nonacq. 2008-9 I.R.B.
2. Revenue Procedure [*Use the I.R.B. citation for 1996 and later years; use the permanent Cumulative Bulletin (C.B.) citation for years prior to 1996*]
Rev. Proc. 1995-30, 1995-2 C.B. 354
Rev. Proc. 2005-25, 2005-17 I.R.B. 962
3. Revenue Ruling [*Use the I.R.B. citation for 1996 and later years; use the permanent Cumulative Bulletin (C.B.) citation for years prior to 1996*]
Rev. Rul. 1995-60, 1995-2 C.B. 78
Rev. Rul. 2005-55, 2005-33 I.R.B. 284
4. Notice [*Use the I.R.B. citation for 1996 and later years; use the permanent Cumulative Bulletin (C.B.) citation for years prior to 1996. If title is given for a notice that has been published on the IRS website but not formally, then put title in quote marks and do not italicize.*]
Notice 1995-10, 1995-1 C.B. 293
Notice 2005-86, 2005-49 I.R.B. 1075
Q&A I-3, I-4, and I-5 in Notice 98-4, 1998-1 C.B. 269
part V of Notice 87-16, 1987-1 C.B. 446
5. Announcement (*Use the I.R.B. citation for all years*)
Announcement 2002-108, 2002-49 I.R.B. 952

IRS Unpublished Advice

1. Advice Memorandum (*Include the full date of the ruling in the citation*)
A.M. 2008-011 (December 5, 2008)
2. Chief Counsel Advice (*Include the full date of the ruling in the citation*)
C.C.A. 1999-07-018 (December 28, 1998)
3. Chief Counsel Memoranda (*Formerly General Counsel Memoranda*)
G.C.M. 39,862 (November 21, 1991)
4. Field Attorney Advice (*Include the full date of the ruling in the citation*)

F.A.A. 2011-51-01F (November 14, 2011)

5. Field Service Advice (*Include the full date of the ruling in the citation*)
F.S.A. 2004-47-018 (August 15, 2002)
6. Private Letter Ruling (*Include the full date of the ruling in the citation—not the date it was released*)
P.L.R. 2007-13-025 (January 3, 2007)
7. Program Manager Technical Assistance (*Include the full date of the ruling in the citation*)
P.M.T.A. 2010-23 (June 30, 2010)
8. Technical Advice Memorandum (*Include the full date of the ruling in the citation—not the date it was released*)
T.A.M. 2007-01-031 (October 3, 2006)

News Releases, Forms, and Publications

1. IRS News Release
IR-News Rel. 2005-57 (May 6, 2005)
2. IRS Publication (*Italicize titles of IRS pubs; include the year and page number reference if helpful*)
IRS Publication 946, *How to Depreciate Property* (2011), p. 32
IRS Publication 946, *How to Depreciate Property* (2011), pp. 32–33
3. IRS Form (*Title capitalization adheres to official IRS form, which does not always follow the standard capitalization rules.*)
Form 1040, U.S. Individual Income Tax Return
Schedule A (Form 1040), Itemized Deductions
4. Federal Register document (*Cite only if I.R.B. citation is not available*)
REG–158747–06, 74 F.R. 789 (January 8, 2009)
T.D. 9436, 74 F.R. 5103 (January 29, 2009)
5. Circular No. 230
Circular 230 § 10.3(f)(3)
Circular No. 230, *Regulations Governing Practice before the Internal Revenue Service*
6. SEC investor alert “Self-Directed IRAs and the Risk of Fraud”

CITATION FORMATS (PUBLICATIONS)

(Follow Chicago Manual of Style)

1. Book

Author's full name [Firstname Lastname], *Title of Book*, 2nd ed. [if not first] (City: Name of publisher, year), 21–23 [page reference]

2. Journal article

Author's full name [Firstname Lastname], "Title of Article," *Name of Journal* 19, no. 1 [volume and number] (year): 131–132 [page reference]

3. Newspaper

Author [Firstname Lastname], "Title of Article," *Name of Newspaper*, date, edition [add URL if online]

4. Website (*Include as much information as can be determined*)

Author [Firstname Lastname (if available; organization may be placed here if no individual author is cited)], "Page Name," Site Owner or Larger Organization, last modified [or accessed, if no last modified date] Month XX, YYYY [spell out month in date: e.g., July 12, 2011], URL.

LISTS

1. Lists should be syntactically consistent, not mixing full sentences and fragments. They should also be parallel, listing items that are all the same part of speech.
2. Vertical lists may be numbered (NL) or bulleted (BL)
 - a. NL: Used to suggest chronology, ordering, relative importance, or when there are sublists. Also may be needed for ease in teaching, if list includes more than three items. Each item generally should be capitalized. Alpha follows numbers for sublists.
 - b. BL: OK even if lead-in refers to a quantity (such as three criteria), unless numerals serve a purpose (see NL). Use sentence capitalization. Incomplete sentences/fragments are OK, but all items in the list should then be fragments. If a term or single word/phrase begins the bulleted item, an em dash follows.
3. Run-in lists generally should not require numbers; if numbers are needed, consider using a vertical list to give the reader greater clarity.
4. List punctuation: A vertical list **generally** should be introduced by a complete sentence, followed by a colon. No end punctuation of items unless the item (NL or BL) is a complete sentence.
5. If a single sentence is presented as a list, internal punctuation is used: semicolons are used between the phrases (which are not capitalized), and a period follows the final phrase. Do not use a colon after the introductory portion if it will separate a preposition or verb from its object.
6. Typography: Use hanging indentation, but align bullet or numeral with left margin of text.

MISCELLANEOUS NOTES

1. Taxbook users are a professional, educated group, but the workbook is covered quickly in the tax schools. Simple language and sentence structure facilitate understanding.
2. An active voice is generally preferable to a passive voice. ("The IRS imposed a penalty" rather than "A penalty was imposed by the IRS.")
3. Use the plus (+), minus (–), times (×), and division (÷) symbols [not a hyphen, x, or slash (/)].
4. Parenthetical calculations usually are helpful: Example: a \$184 (\$100 + \$50 + \$34) total penalty.
5. 2%-of-AGI floor, but 2% of adjusted gross income floor is okay (due to length)
6. IRS used as a noun should be preceded by the article *the*, as in the following: "The IRS did not claim that the taxpayer lacked basis in her stock."

7. Use of terminology: FICA, social security, Medicare, self-employment, and FUTA taxes: Be careful to use the proper terms for the issue.
 - a. Use FICA taxes when referring to employee social security and Medicare taxes.
 - b. Use self-employment (SE) tax when referring to self-employed taxpayer.
 - c. Use social security and Medicare taxes when referring to both of them for all taxpayers (employees and self-employed).
 - d. Use FUTA when referring only to unemployment taxes.
 - e. Use employment taxes (not payroll taxes) when referring to FICA and FUTA.
 - f. Use social security and Medicare taxes.
8. Text should not assume that user has read the heading. For example, if the heading includes a legislative act, the act name should be repeated in the text.
9. Acronyms should not be used in the headings unless they were previously introduced in the text.

NUMBERS AND DATES

1. Spell out one through nine, except for certain conventions such as dates, percentages, etc., as specified in the Chicago Manual of Style. Spell out higher numbers or use numerals for one through nine only if needed for consistency or at the start of a sentence. e.g., “A deferred arrangement is limited to employers with at least 2 but not more than 500 employees.”
2. 1979–2002 (Use en dash for year ranges; do not abbreviate, as in 1997–99)
3. year 1, 1-year (adj), 5 years, 6 months, 10-year period; 10-year-old son is 10 years old
4. one year (not 1 year) when referring to time periods similar to the following example: “But if the tax benefit is claimed in one year and the refund is received in a subsequent year, a tax-benefit calculation is required.” But “If the second sale occurs 2 or more years after ...”
5. April 5, 2012, (comma follows year in text); use numerical date in tables MM/DD/YEAR (example: 04/05/2012)
6. April 2012 (OK to abbreviate months in tables; comma does not follow year in text if no specific day is present)
7. mid-1990s (with no apostrophe)
8. 40s (with no apostrophe: as in “they are in their 40s”)
9. 24-7 (for 24 hours a day, 7 days a week)
10. 3:00 PM (use small caps without periods)
11. 5 miles, 2 acres, 9 feet
12. Spell out ordinals (except in legal citations: 1st, 2d, 3d, 4th, etc. Cir.; do not use superscript in citations).
13. Fractions: Spell out simple fractions (a two-thirds majority) but use numerals with whole numbers (age 59½).
14. Spell out “one-eighth,” “seven-eighths,” etc., in text but use ⅛ and ⅞ in figures.
15. Zero should precede a decimal fraction in text (0.05)
16. one-in-three likelihood
17. Use comma with 4 digits (or more) except in the following situations:
 - a. Years
 - b. Form numbers (Form 1040)
 - c. Amount entries on Forms W-2, 1098, and 1099
 - d. Address numbers

18. \$7,000,000, but \$7 billion (and larger). Exception: If the intent is to use thousand or million as a rounded number, we should use the word so that we do not imply more exactness than is true: “There is enough oil to last a thousand years.” “Her mind was a million miles away.”
19. Dollar amounts **generally** should be rounded (eliminating cents) in text and on forms. Include cents in calculations when necessary.
20. Dollar signs and cents signs should generally be used with numerals (25¢, not 25 cents).
21. 10% (not 10 percent)
22. 10% excise tax (no hyphens)
23. Follow IRS format for form numbers: examples Form 1040X; Form 1099-A
24. Phone number: 800.245.6789
25. Negative numbers should be enclosed in parentheses in tables. Use a minus sign before negative numbers in text and on tax forms. (The keystrokes for a minus sign are Ctrl+hyphen OR simply use the insert symbol menu option and select minus sign.)
26. Parenthetical calculations in text should generally use mathematical symbols [(\$600 + \$400) ÷ 5]

PUNCTUATION

1. Use serial comma (a, b, and c).
2. If a prepositional phrase begins a sentence, use a comma afterward only if the phrase is more than four words long (generally; however, a comma may be added if two elements, such as names, need to be separated to avoid ambiguity).
3. Do not separate prepositions and verbs from their objects by a colon, even in lists.
4. Colon: Only capitalize first word (of a complete sentence) that follows colon if the colon introduces multiple sentences.
5. For parenthesis, use brackets first, not parens. Inside brackets, use parens. [(...)]. An exception is for citations: use brackets even if only one level is needed, e.g., [I.R.C. § 179].
6. For parenthesis when three groupings are needed: Insert braces between brackets and parens. [{{(...)}}
7. All punctuation marks should appear in the same font—roman or italic—as the main surrounding text, except for punctuation that belongs to a title or an exclamation in a different font.
8. Punctuation marks following boldface should be dealt with case by case, depending on how the boldface word is used. (See 6.4 in Chicago Manual of Style, 15th edition.)
9. Periods and commas belong within either single or double closing quotation marks.
10. Hyphens should not be *added* to URLs. Line breaks in URLs should not occur after existing hyphens. (See *also URL Line Breaks* later.)
11. Use *italics* to identify key terms on first reference (rather than boldfacing, underlining, or enclosing in quotation marks).
12. Boldface may be used **sparingly** to distinguish elements needing greater prominence.
13. Do not underline any text. Emphasize a word with bold (sparingly) or italics as appropriate.
14. Hyphenate compound modifiers preceding a noun only in cases listed on style sheet (such as when another noun follows *low*, *middle*, *high*, *well*, or *ill*), or when the hyphen eliminates confusion.
15. Do not hyphenate compound modifiers using an adverb ending in *ly*. (*Example*: closely held corporation)
16. Use an en dash to hyphenate compound terms. (*Example*: income tax–cutting objectives), unless the term already includes a hyphen. (*Example*: non-English-speaking)
17. 2%-of-AGI floor, but 2% of adjusted gross income floor is okay (due to length)

18. No second comma after Inc. (*Company, Inc. v. Commissioner*) unless there is an appositive (e.g., Land Grant University Tax Education Foundation, Inc., a tax exempt organization is the publisher of the best annual tax CPE material.)
19. No second comma after LLC (*Company, LLC v. Commissioner*) unless there is an appositive (e.g., Taxinsight, LLC, an S Corporation, is ...).
20. For a nonbreaking space, use the keystrokes Ctrl+Shift+space bar.

QUOTATIONS

1. Short quotations should be run-in with text, enclosed in quotation marks, and credited.
2. Longer quotations (generally more than two to three sentences) should be set off as block quotations, without quote marks.
3. **Written permission is usually needed for quotations of more than a line or two** [authors should alert Phil early in the writing process (even if chapter is not finished); he will seek permission]. Written permission is not needed when quoting government publications, but they should be credited.
4. Use the three- or four-dot method for ellipses in quotations; three dots indicate an omission within a sentence; four dots indicate the omission of one or more sentences.
5. Changes in capitalization generally should not be bracketed. (See 11.16 in Chicago Manual of Style, 15th edition.)
6. Insertions in quoted material should be bracketed.

TYPOGRAPHY

**** Please note:** The appearance of a style applied in the Word document may not reflect its final typeset appearance. The style of each element should be coded with the appropriate Word style for that element, which will correspond to a specified style in typesetting. **Authors and editors should be less concerned with how the style appears (e.g., boldface or line spacing) in Word than with ensuring that the appropriate style is applied.**

Heads and Subheads

Taxbook makes use of up to 5 heads.

1. Heads must follow a logical order. Each level of head should have more “weight” than the subheads that follow it. In effect, the subheads are dependent on the heads that they follow.
2. Heads should follow in order. An H2 follows an H1, an H3 follows an H2, and so forth. In general, heads should not be skipped. For example, if a particular H2 seems to have more “weight” than it should and would seem more logical to be an H3, an H2 should be created to precede the H3; a simple summary of the H3s to follow will do.
3. Generally, a minimum of 2 heads of the same level should follow a head of a higher level.
4. Heads should not “float” or be “stacked.” Each head should have at least one sentence following it and preceding the subhead.

[CT] BUSINESS ENTITIES

[H1] SINGLE-MEMBER LLC [Boxed text] (This section compares the three options for the tax status of a single-member LLC)

[H2] SMLLC Taxed as S Corporation [Boxed text] (This is the third H2 following the H1)

[H3] Deduction Limits

[H3] S Corporation Debt Basis

[H4] *Other Loss Limits*

[H4] *Basis Adjustments* . . . but the shareholder may choose between a general ordering rule and an elective ordering rule . . .

[H5] General Ordering Rule

[H5] Elective Ordering Rule

Heading capitalization style should be as follows:

- H1: ALL CAPS (boxed)
- H2: C/lc (boxed)
- H3: C/lc
- H4: C/lc, italic
- H5: C/lc, not bold
- Example: Example 1.1 Basis Calculation (The example title should be headline-style capitalization, with no punctuation at the end.)
- The titles of Practitioner Notes, Observations, and similar elements should be set headline-style with no punctuation before or after the titles.

Examples

If headings are needed within an example, begin with an [H4] and follow with an [H5], if needed.

Tables

1. All tables should be referred to as “Figures” both in text and in title, regardless of size.
2. Final totals in tables should have a double underline.
3. Figure Title: C/lc
4. Column Head: C/lc
5. Table Body: sentence-style
6. Set \$ signs only at top of table column of figures and before subtotals and totals, not before each dollar amount (unless table does not total).
7. If used, \$ sign should precede the opening parenthesis for a negative number
8. A separate column should be used for the closing parenthesis for negative numbers, to ensure that the figures align correctly.

Other Elements

1. Tax form names in roman, C/lc
2. The name of a form needs to be spelled out only on first mention in a section of a chapter, so long as names of other forms are not discussed one after another in the same section.
3. *Court case names in italic* (remainder of citation is roman)
4. Publication names: *italic* C/lc (this includes IRS publications)
5. Refer to previous editions as (e.g.) *2010 National Income Tax Workbook*
6. Reviewers: If there is an [ENDOFEXAMPLE] in the manuscript, the typeset copy will replace the [ENDOFEXAMPLE] with a bar after that paragraph indicating the end of the example.
7. Terms should be in italics, not underlined or boldfaced.
8. Text should not be underlined. Emphasize a word with bold (sparingly) or with italics as appropriate.
9. Question/Answer: In the Word document, the question should be set as HQ with the text “Question” and the appropriate number following; the answer should be set as HA with the text “Answer” and corresponding number. A period should follow the number in both cases. The text of the question and answer should be set as QT and should start on a separate line.

10. Use a monospace font for website addresses (URLs) in text. Courier New works well.
11. For the Rulings and Cases chapter: Spell out the citations in the headings, but not in the Rulings and Cases TOC.

URL LINE BREAKS

It may become necessary to break a very long URL at the end of a line of text. It is important to never add a hyphen to a URL to show a break, and to never break a line right after a hyphen. Precise adjustments to such line breaks are made in typesetting rather than in the Word file manuscript. Here is a summary of how such line breaks work in a typeset document:

Break before These Characters (character begins new line)

single slash [/]
 hyphen [-]
 number sign [#]
 percent symbol [%]
 plus sign [+]
 period [.]
 tilde [~]
 comma [,]
 underline [_]
 question mark [?]
 colon [:]

at symbol [@]

Break after These Characters (character ends line)

double slash [/] if following http:

Break before or after These Characters (character begins or ends line)

equal sign [=]
 ampersand [&]

WORD USAGE

Please note: Single-term examples are set italic in this section so you can easily distinguish them from surrounding text. They are not to be set italic in text.

1. Splitting infinitives is permitted (and often encouraged).
2. *Since* relates to time; substitute *because* in a causation context; forgo *due to the fact that*.
3. *While* denotes time; *although* or *whereas* denotes contrast.
4. *Which* should be used nonrestrictively to add information; it is preceded by a comma. (This acreage, which is the only one in question, is now for sale.)
5. Use *that* as a restrictive relative pronoun (a building that is taller).
6. When using a modifier such as *only*, it should be as close to the word that it modifies as possible. (Correct: Justin is a college student who works only part-time. Incorrect: Justin is a college student who only works part-time.)
7. "In order to" and "in order for" generally should be reduced to "to" or "for."
8. Plural pronouns should **not** refer to singular nouns.
9. Gender-neutral language should be used ("Tax preparers should ask their clients. . ." rather than "A tax preparer should ask his clients. . ."
 - a. Use *his* and *her(s)* (not *their*) as singular possessive pronouns. "The taxpayer's choice of whether or not to declare bankruptcy will affect his or her income taxes."
 - b. Use *he* or *she* (not *they* and not *he/she*) as singular pronouns. "If the debtor chooses a single tax year, the attributes that he or she has at the beginning of that year pass to the bankruptcy estate."
10. *Ensure*, *insure*, and *assure* can be tricky. The following sentences provide examples of correct usage. "Once they ensure the occurrence of an event, they can assure themselves that it will take place." "By insuring against risk, they ensure that they will not suffer excessive loss."
11. Use *first*, *second*, *third*, and so forth, avoiding the *-ly* forms, in enumerating items.

12. Use *supra* and *infra* (or *earlier* and *later*), rather than “above” and “below,” because the citation or other material referenced may appear on a different page.
13. Every word counts: Avoid extra prepositions, and place numbers before words (“a \$184 basis,” rather than “a basis of \$184”).

CONSISTENCY LIST

Abbreviations used in list

n = noun
v = verb
adj = adjective
adv = adverb
s = singular
pa = adjective following a “be” verb
pl = plural

Numbers

a \$150-per-share FMV
2%-of-AGI floor, but 2% of adjusted gross income floor is okay (due to length)
2-out-of-5-year ownership rule
27½-year (adj)
3-prior-year test
3-tax-year period
50¢-for-each-\$1 rate
5-year lookback recapture provision
10-employee rule
100%-of-net-income limit
x-square-foot (adj)
x-pound (adj)

A

abandoned property rules
above average return
above-the-line deduction
A-B trust
account-by-account basis
accrual method (n, adj)
acknowledgment
acquirer (*not* acquiror)
active duty (adj, n)
active participation (adj)
actual service hours method
acq. (legal abbreviation)
adddback (n)
adviser (not advisor)
aff'd per curiam (enclosed by commas)
African-American (n, adj)
after-tax (adj)
AGI (adjusted gross income); an AGI
agribiodiesel (adj)
agrchemical
air conditioning unit
Alaska Native Settlement Trusts

all events test
all-inclusive (adj, pa)
ambulance-hearse (n)
American opportunity credit
amount at risk limitation
Announcement (*IRS context*)
annual use tax
anti-abuse (adj)
antichurning (adj)
antidiscrimination (adj)
anti-cutback
anti-spam (adj)
(IRS) Appeals Office, but local appeals office
appeals officer
apple-growing (adj)
arm's length transaction
as (in headline style, even though it's an adverb and not a preposition)
as-needed (adj)
Asset A
asset-based (adj)
asset class 79.0, Recreation
As such,
attorney-client privilege
at-risk (adj)
(the) at least 80% rule
Audit CAP
automatic change 107
average basis (adj)

B

back pay
backup (n, adj)
bad-faith (adj)
bankruptcy estate
noun-based (adj), e.g., work-based
basis determination (n, adj)
basis-first (adj)
below-market (adj)
below-the-line (adj)
benefiting, benefited (one "t")
bid-ask price
bioenergy
biweekly
Blue Bag Program
Bluebook (*General Explanation of Tax Legislation...*)
bondholder
bookkeeping (adj, n)
book retained earnings
box 6 (on a form)
Braille
bright-line guidance
broad-based (adj)
(real estate) broker's license
brownfields
brush-off (n)
build-out (n)

built-in (adj)
business expense (n, adj)
business loss (n, adj)
Business 1
business planning (n, adj)
business purpose (adj)
business use (adj)
business use (n)
buy-sell provisions
buyout (adj)(n)
buy out (v)
bylaw (n)

C

C corporation (keep together on same line)
caesarian birth
cafeteria plan (n, adj)
calendar-year (adj)
caller ID
canceled
cancellation
cancellation of debt income (CODI) exclusion
capital gain treatment
capital loss (n, adj)
car and truck expense–related (adj)
caregiver (n), caregiving (adj, n)
car pricing guides
carryback (adj)
carry back (v)
carryback-year (adj)
carry forward (v)
carryforward (adj)
carryover (adj)(n)
carry over (v)
carve-out insurance
cash-basis (adj)
cash-intensive (adj)
cash-out (n, adj)
cash out (v)
cash-lease (v)
cash-rent (v)
cash surrender value
cash value life insurance
cast-off asset
catch-up (adj)
cellulosic
central time
chapter 11, 7, etc. (bankruptcy)
checkbox (n)
check-cashing (adj)
“check the box” regulation
child care (adj)
child support (adj)
children’s benefits
chip-n-saw (not chip and saw)
Class III device

clean fuel (n, adj)
client-practitioner relationship
close-knit (adj)
co-author (n, v)
COBRA
code G
coexist
co-executor
co-guardian
Cohan rule
coin-operated (adj)
collectibility
comaking (as related to comaker)
combat zone (n)
combat-zone pay (adj)
commingle
(IRS) commissioner
common control (adj)
common-law marriage
common law standard
community property state
company-owned (adj)
conflict-of-interest (adj)
Congress, but congressional
consumer-driven health plans
cooperative, but co-op
co-owner
co-payment/co-pay (n)
co-signer, co-sign
cosponsor (v, n)
cost-basis (adj)
cost basis (n)
cost-effective (adj, pa)
cost-of-living (adj)
cost recovery period
cost segregation (adj)
cost-sharing (adj)
co-trustee
counterargument
court-appointed (adj)
co-venturer
covered option standards
coworker
Coverdale education savings account
court-appointed (adj)
CP2000 (IRS notice)
CPA, CPAs (pl) (do not spell out)
credit card (n, adj)
credit-elect (adj)
crop loss (n, adj)
crop share (adj)
cross-check (v)(n)
current income (adj)
current period (adj)
curtesy
customer use test

cybercrime

D

D.C. homebuyer credit

data entry (n, adj)

date-of-death (adj)

date of hire

day care (adj)

days-worked equivalency

daytime (adj)

day trader (n)

debt-financed (adj, pa)

debtor-owner (n)

debt-to-basis ratio

decision maker (n)

decision making (n)

deductible, deductibility

deep-sea (adj)

defendant

deferred compensation plan

deferred-exchange

deferred payment (n, adj)

defined benefit (n, adj)

defined-contribution (adj)

de minimis (not ital)

de novo

dependency exemption deduction

dependent care (adj)

descendant (but decedent)

dial-up service

difficulty of care payment (per I.R.C.)

directors' fees

direct selling company

disabled access standards

disaster area (n, adj)

disaster area-related (adj, pa)

discharge-of-indebtedness income

distribution-level taxation

dividend-paying (adj)

dividends received deduction

document-matching (adj)

dollar for dollar (adv)

dollar value formula

doorman, pl. doormen

door-to-door (adj)

dot-com (not dot.com) when referring to an Internet-based company

double-category method

double declining balance (DDB)

double-dipping (n)

downline distributor

down payment

downtime (n)

DPGR (domestic production gross receipts)—allow plural construction (i.e., DPGR are receipts...)

(U.S.) Drought Monitor

dry-docked (adj), dry docked (pa)

dual-status (adj)

due diligence requirements

E

E&P (pl)(earnings and profits)

early distribution penalty

earned income credit

eastern time

e-commerce

economic interest test

education credit (n, adj)

education institution

e-file (always lc)—E-File in headings

e-file/e-filed (v)

electable; but electible for purposes of I.R.C. § 1301, as per Treas. Reg. § 1.1301-1

electric drive motorcycle

e-mail

“Complete quotation here” (emphasis added).

employee-only (adj)

employees’ trust

employee-type (adj)

employer matching share

employer-provided (adj)

employer-sponsored (adj); generally, employer-participant here

employment tax (adj)

energy-efficient (adj)

enrolled agents

equity-financed (adj)

ERISA-qualified (adj)

e-services—E-Services in headings

estate planning (n, adj)

estate tax (n, adj)

estoppel

et seq. (equivalent of “ff.” for code references)

ever-changing (adj)

everyday (adj)

excludable (not excludible)

exclusive use test (adj)

exempt recipient status

ex-wife, ex-husband

F

FICA (do not spell out)

face-to-face (adv, adj)

face value

fact-finding (n, adj)

facts and circumstances test

failure-to-file penalty

fair market value (FMV)

family-owned

farmers’ market

farmland

farm rental income

fast food restaurant

Federal Highway Trust Fund program

federal income tax return

fee-for-service plan

fee simple (adj)
fee splitting (n)
filing status–based
filmmaking (n, adj)
final-year (adj)
financial service activities
fine-tune (v)
first-in, first-out method
first-time (adj)
fiscal-year (adj)
5-year rule
fixed-rate (adj)
fixer-upper (n, adj)
flat-rate (adj)
flexible spending arrangement
flowchart
flow-through (adj, n)
follow-up (adj)
food stamp assistance
foreign earned (adj)
foreign financial account filing requirements
foreign source (adj)
foreign tax credit
forgone (not foregone)
Form 1040X (not the Form 1040X)
for-profit (adj), but for profit (pa)
401(k)
fourth-quarter (adj), ordinal-quarter
fourth-year (adj), ordinal-year
four-wheeled (adj)
noun-free (adj), e.g., interest-free
freedom of religion clause
noun-friendly (adj, pa), e.g., taxpayer-friendly, practitioner-friendly
fringe benefit (adj), fringe benefit plan (adj)
fringe benefits (no hyphen)
front-load(ing)
fuel cell (n, adj)
full-paid (adj, pa)
full-time (adj, adv, pa), but full time (n)
full-year (adj)
functional interdependence test
fund-raiser (n)
functional use test
FUTA (do not spell out)
futures contract (n, adj)

G

garnisheed (past tense of garnishee)
general depreciation system (GDS), alternative depreciation system (ADS)
Generally, ...
general-purpose (adj)
generation-skipping (adj)
goodwill
gift-splitting (adj); gift splitting (n)
gift-term (adj)
group health plan

group-term (adj)
good faith (n, adj)
“good used condition or better” rule
going-concern (adj)
gold mine
government contractor payments
government-issued (adj)
grantor retained annuity trust
greater-than-50% likelihood
gross-up (n)
groundwater (one word)
Group Risk Protection (GRP)
guarantee (v)
guaranty, pl: guaranties (n)
Gulf Opportunity Zone (n, adj)

H

half-time (adj, pa)
hand-deliver (v)
hands-on (adj)
hard-and-fast rule
head of household (n, adj)
health care (n, adj)
health care coverage (n, adj)
health care–related (adj)
health care premium assistance credit
hearing, in “CAP hearing” or “CDP hearing”
heavy vehicle use tax
high(er)- (adj), unless followed by long, unhyphenated compound noun: higher statutory exemption amounts
high–cost per diem amount
high deductible health plan
higher education (adj)
higher education tuition deduction
higher-income taxpayer
higher percentage contribution
highest compensated (adj)
high-low method
highly compensated employee (HCE)
high–net worth individual
highway-related (adj)
highway use tax
hobby loss rules
holding period (n, adj)
home-based (adj)
home builder (n)
homebuyer
home-buying (n)
home care agency
home office (adj)
homeowner
homesale
Hope credit
horse breeding (n, adj)
hostile-fire pay
House committee

I

identity theft (n, adj)
..., and if necessary, ...
IIR (Industry Issue Resolution)
imminent-danger pay
includable (not includible)
income averaging (n, adj)
income-based (adj), income based (pa)
income-generating (adj)
Income in Respect of a Decedent (note the “a”)
income-producing (adj)
income-reporting accuracy
income-shifting (adj)
income tax-free (adj)
incorporated pocketbook theory
individual retirement account (IRA)
inflation-adjusted (adj, pa)
inflow (n)
initial first-time homebuyer tax credit
in-kind (adj, pa); in kind (adv)
inpatient (n, adj)
in-person (adj)
installment sale (n, adj)
insurance company only controlled group
interest-bearing (adj)
interest compounding period
Internal Revenue Service Center
inter vivos (in roman)
intra-family (adj)
intra-partner
inventoriable
investment interest limit
IRA
I.R.C. (Internal Revenue Code)
irrebuttable
IRS (see the Miscellaneous Notes section)
IRS's

J

job hopping (n)
Joint Committee (caps when referring to congressional committee)
joint life expectancy
joint return (n, adj)
, Jr. (*use comma before*)
judgment

K

Keogh plan (n, adj)
key employee (n, adj)
key person (n)
Korea free trade agreement (not the formal name, so lc)

L

lack-of-marketability discounts
land-clearing cost

large- (adj)
last known (adj)
late-filed (adj), late-filing (adj)
layoff (n)
leasehold(s)
lease-up services
lessee
lessor
letter rulings (l.c. generic; cap. only when citing a specific ruling)
lifetime (adj)
lifetime learning credit
LIFO (last-in, first-out)
like-kind (adj, pa)
like-new (adj)
limited scope (adj)
listed property (adj)
Company, LLC ...
logbook
long- (adj)
long-dormant (adj)
longer production period property
long-lived (adj)
long-term (adj)
longtime
long-standing (adj)
lookback period
look-through (adj)
loss basis rule
loss year (n, adj)
lot selection method
low-cost per diem amount
low(er)-income taxpayer
lower-yielding (adj)
low-income (adj)
low-speed vehicle
Company Name Ltd., Inc.
lump-sum (adj)

M

a MACRS (modified accelerated cost recovery system)
MACRS general depreciation system
MAGI (modified adjusted gross income)
makeup (adj)(n)
managed care plan
mare lease program
mark-to-market (adj)
marked-to-market capital gain election
market value (n, adj)
markup (n, adj)
meals only amount
means-tested (adj and pa)
medical care (n, adj)
medical expense (adj)
Medicare
Medicare Advantage plans
Medicare-funding (adj)

Medicare Part B coverage
merchant card (adj)
message-taking (n, adj)
microturbine
mid-2001
mid-1990s
middle-income (adj)
midpoint
mid-quarter
midsize (adj)
mid-term
Midwest disaster area
mid-year
mini-mart (n)
minimum funding rules
minority interest discounts
mis-key (v)
misuse
modern-day (adj)
money market account
money purchase pension plan
more-likely-than-not standard
more-than-50% control test
more than one-half of personal services rule
motor fuels taxes
motorsports (n, adj)
multiemployer
multilevel (adj)
multimember
multiple support agreement
multi-unit (Multi-unit in headline style)
multiyear (adj)
mutual fund (adj)

N

NAICS Code 42
needs-based (adj, pa)
nest egg
New York Liberty Zone
no-additional-cost (adj)
“no” answers, but say no (no quotes)
nonalimony
no closing cost loans
no-interest loan
an NOL (net operating loss)
non[(usually)
non-account investment assets
non-actively traded (adj)
nonadverse (adj)
non-allowable (use prohibited instead)
non-attorney (n)
nonbenefit (adj)
nonbusiness
noncash
non-choice
non-commercial

noncommunity property state
noncompensatory
noncompliance
nonconsecutive
noncorporate
noncovered
noncustodial
nondeductible
nondeductibility
nondeferral period payment
nondepreciable
nondesignated (adj)
nondiscriminatory
nondetailed
non-earning
non-effectively connected payments
nonelective
nonemployee compensation
nonentity
nonexclusive
nonexempt (adj)
nonfarm (adj)
nonfiler, nonfiling
non-Form 1040 preparer
nongrantor trust
nongroup insurance
non-highly compensated employee (NHCE)
nonhydrogen (adj)
nonimmediate
nonimmigrant (n)(adj)
non-incident
non-income tax
non-individual (n)
non-interest-bearing notes
nonjudicial
non-key (adj)
nonlawyer
nonliable (adj)
nonmatching
non-material
non-mirror code (adj)
nonnative (adj)
nonobligated (adj)
non-owner (adj, n)
nonparticipating/-ant
nonpassive
nonpayment (n, adj)
nonperiodic (adj)
non-personal use (adj)
nonphysical
nonprofit
nonpublic personal information
nonpublicly traded (adj)
nonqualifying
nonrace
nonrecaptured (use unrecaptured)

nonrecognition
nonrecourse (adj)
nonrefundable
nonreimbursed (use unreimbursed)
nonrental
nonresidential (adj), nonresident
non-rollover (adj)
non-Roth employer plan
nonshareholder
non-signing (adj)
non-skip (adj)
nonspousal, nonspouse
nonsubstantive (adj)
nontax (adj)
non-toll-free
non-U.S. citizen spouse
non-use
nonvested
non-wages
non-willful (adj)
no-other-sale-within-2-years rule
no-ownership requirement
no tax due return
Notice of Federal Tax Lien

O

odd-numbered (adj)
offshore
offset (n)
off-the-shelf (adj)
Ogallala Formation Aquifer, Ogallala Aquifer
okay (not OK)
onboard
one-half (n)
one-person (adj)
one-time (adj)
on-farm (adj), On-Farm in headline style
office-in-home (adj)
once-in-a-lifetime (adj)
one-income couple
one-quarter credit
one-size-fits-all approach
onetime
one-unit (adj)
online
on-site (adj, adv)
on-the-job training
OPR, the
open-end investment company
open-ended (adj)
Optional Method 1/Optional Method 2 (Form 1041)
ordinary income tax bracket
otherwise adjective noun (no hyphen), e.g., otherwise diligent preparer
out-of-pocket (adj)(adv)
out-of-sight, out-of-mind (adj)
out-of-state (adj)

over-65 schedule
overcollection (n), overcollect (v)
overreport
overstate
over-the-counter (adj)
over-the-road (adj)
owner-employee, pl. owner-employee44],
owner-lender (n)

P

(page 1 of 2) in figure titles, unless it follows another parenthesis, in which case: *FIGURE XX.22*
2011 Schedule F (Form 1040), page 1 of 2

paid-in (adj)
partial-business use (adj)
partial-year (adj)
number-party (adj), e.g., three-party
passive activity (adj)
passive loss (adj)
pass-through (n)(adj), Pass-Through in headlines
pass through (v)
past-due (adj), but past due (pa)
payer (not payor)
paycheck
payee
payment card (n, adj)
payment settlement entity
pay-on-death designations
Pell grant
penalty-free (adj)
pension funding stabilization
percentage-of-AGI limits
per diem (adj)
per foot (adj)
personal exemption deduction
personal service corporation
personal use (adj)
person-to-person (adj)
per-unit retain
phased out (pa), Phased Out in headlines
phasedown (n), phase-down (adj)
phasein (adj, n)
phase in (v)
phaseout (adj, n)
phase out (v)
phone line
pickup truck
PIG (passive income generator)
placed-in-service (adj)
plan offset amount
plan-year (adj)
plug-in (adj)
PO Box #
pocket-size (adj)
point of sale (n, adj)
policy maker
post-death (adj)

post-employment (adj)
post-event
post-filing
post-judgment
postmarket
postpetition (adj)
postretirement (adj)
post-secondary (adj)
post-separation
pour-over (adj); pour over (n)
practitioner-client relationship
pre-59½
preassessment
pre-assigned PIN
pre-audit (adj)
preceding year test
pre-deduction
predivorce
preempt
pre-entry, post-entry (adj)
preestablished
preexisting
prefiling
prelevy
premarket
premerchtable (adj)
pre-need (adj)
preowned
prepaid, prepayment
preproduction (n)(adj), preproduction expenses (vs. preproductive period)
preproductive period
prerefund
pre-retirement (adj). Contrary to Merriam Webster, but it's much more readable.
preschool
pre-screening (per IRS)
prescription drug coverage
pretax (adj)
pretrial
principal residence
prior-law (adj)
prior year (n)
prior-year (adj), but prior law (adj)
prison-assigned inmate number
private letter ruling (l.c. generic; cap. only when citing a specific ruling)
private party sale
private sector (adj)
processable
processing-time (adj)
product testing (n, adj)
profit motive (n, adj)
profit-sharing (adj)
property class recovery period
proposed regs
pro rata
prorated
proven, not proved, as past participle

pseudolegal
“put or keep” test
PTIN holder (n, adj)
public safety (n, adj)

Q
qualified terminal interest property (QTIP) trust
qualified zone academy bonds
quasi- (adj)

R
rank-and-file (adj)
reemerge (v)
reenacted
refined coal production credit
regular income tax purposes
regular tax (n, adj)
related party (n, adj)
noun-noun relationship (use hyphen, not slash)
rental real estate activities
noun-reporting (adj), e.g. tax-reporting, income-reporting
requalify (v)
required beginning distribution date
re-registration
resource-intensive (adj)
retirement plan (n, adj)
return-filing (adj)
revenue procedure (lc generic; cap. only when citing a specific procedure)
revenue ruling (lc generic; cap. only when citing a specific ruling)
reverend (Reverend as title) (spell out, even as a title, to avoid confusion with revenue ruling abbreviation)
reverification
rewallpapering (n, adj)
risk management (n, adj)
risk reduction (n, adj)
roof-mounted (adj)
round-trip (n, adj); 100-mile round-trip commute
routine maintenance (adj)

S
safe deposit box
safeguard (v, n)
safe harbor (n, adj)
salable (not saleable)
salary deferral (n, adj)
salary reduction contribution
sale-leaseback transaction
salespersons
same-sex
S corporation (adj)(n) (keep together on the same line)
S&P 500 Index
U.S. savings bonds
Schedule A (B, C, etc.)
seagoing (adj)
second generation biofuelw
secretary of the Treasury

self-
 self-employment (SE) tax: okay to use SE when it modifies another word (e.g., SE tax, SE earnings), but retain full spelling when the word is used on its own (e.g., Her net earnings from self-employment were less than \$1,000).
 self-only premium
 self-plus-one coverage
 seller financing (n)
 semiannual
 semimonthly
 semiprivate
 a (not an) SEP IRA
 series EE bonds, series I bonds
 #-series forms (e.g., 1099-series forms)
 servicemember (i.e., serviceman or servicewoman)
 settlor (okay to use in reference to grantors)
 set up (v)
 setup (n), set-up (adj)
 shareholder-employee (n)
 short- (adj)(n)
 shortfall (n, adj)
 showroom (n)
 sick pay (n, adj)
 (a) SIMPLE IRA
 Simplified Method (Worksheet)
 single-account election
 single-category (adj)
 single class of stock rule
 single-employer plan
 single-family (adj)
 single-member (adj)
 single-purpose (adj)
 small business stock
 small group market
 small town (n, adj)
 social security benefits records
 social security number (SSN)
 social security-type (adj)
 sod-cutting (adj), sod cutting (n)
 software development company
 SPPA (significant participation passive activity)
 special needs (adj)
 special use valuation
 specific identification requirement
 spin-off (n)(adj)
 spin off, spun off (v)
 split-adjusted
 split-dollar life insurance
 split-interest trust
 split-off(n)
 split-up (n)
 sporting goods store
 SSA (Social Security Administration), uses definite article
 #-stage (e.g., two-stage)
 stand-alone (adj)
 Standard & Poor
 start-up (n, adj)

state-qualified health plan
stay-at-home (adj)
#-step (adj), e.g., five-step process
stepsibling
stepped-up, stepped-down (adj); stepped up, stepped down (pa)
step-up (n), step-down (n)
Stock A, Stock B (in example instead of giving a name)
stop-loss
stored-value card
straight-line (adj)(S/L)
stretch-out (adj)
student loan interest deduction
subchapter K
subpart F
substantial portion test
super-fast (adj)
supersede, not supercede
Supreme Court (capitalize Court when referring to S.C.)
survivors benefit(s)

T

T-account, cash T-account
TRA 1986
take-home pay
tax-advantaged (adj)
tax-avoidance (adj)
tax-based (adj), tax based (pa)
tax benefit option
tax compliance (n, adj)
Tax Court
tax-deductible (adj), but tax deductible (pa)
tax-deferred (adj, adv, n), but tax deferred (pa)
tax efficiency (n, adj)
tax-efficient (adj)
tax-exempt (adj), but tax exempt (pa)
tax filing (adj)
tax-free (adj, adv), but tax free (pa)
taxicab (n, adj)
tax levy rule
tax-minimizing (adj)
tax-planning (adj)
tax planning (n)
tax-related (adj, pa)
tax return preparer (n and adj)
taxpayer
taxpayer-friendly (adj, pa)
taxpaying (adj)
taxpayer's age
tax-saving (adj)
tax-sensitive (adj)
tax treaty rate
tax years (not taxable years)
tear-off (adj)
teenage (adj)
tenants in common (n)
term-certain (adj)

territory source (adj)
test preparation classes
text delimited format
than (capitalize in titles)
then applicable (adj), e.g., “the then applicable law”
three-wheeled (adj)
third-party (adj), third party (n)
thought-out (adj)
three-party (adj)
Thus it is possible (etc.)...
tiebreaker (n, adj)
tier 1 (n, adj)
time-consuming (adj), time consuming (pa)
time frame (2 words, per *Webster’s*)
timely mailing, timely filing rule
time period
time-sensitive (adj), time sensitive (pa)
time-share (n, adj)
TIN matching (n)
tip allocation (n, adj)
tip line
tip-splitting, tip-pooling, tip-sharing (in general, tip-presentparticle) as adjectives, but tip reporting, etc., as nouns
toll-free (adj)
tornadoes (*not* tornados)
top level (adj)
toward
tradable
trade-in, trade-off (n)
trade-affected (adj)
trade-off (n)
trade readjustment (adj)
transferee
transferor
Treasury, Treasury Department
Treasury regulation (l.c. generic; cap only when citing a specific regulation)
2-for-1 (adj)
trustee involvement requirement
trustee-to-trustee transfer
turnkey
two-return rule
TY 2006 (or any other year)
Type D

U

unagreed (adj)
underwithholding
underreport (v), underreporting (n)
unenrolled
Uniform Table
unindexed (adj)
unitrust
unrecaptured
unreimbursed
up-front (adj), up front (adv)
urban national forest

U.S. (adj) (spell out as noun)
U.S. Constitution
U.S. district court (if it's not specified which district court; if longer name is given, then cap.)
use-it-or-lose-it plan
U.S. embassy (in unspecified country)
user name
U.S. Postal Service
U.S. savings bonds
U.S. source income
U.S. Treasury bonds

V

variable-rate premium
value-enhancing (adj)
VCSP, the
vendor testing center
veneer-grade timber
vehicle-refueling (adj)
vehicle refueling (n)
veterans' preference
videotape
voluntary employees' beneficiary association

W

wage earner (n)
wash sale (n, adj)
water-heating property
web-based
webcast
web development
webpage
website (*do not* make a note in double square brackets to set monospace for URLs)
weeks-worked (adj)
"what if" process
whole farm unit
wind energy (n, adj)
wine-aging process
withhold (v), withholding (n)
woodyard
workday (adj)(n)
workers' compensation
work papers (two words)
workplace
work opportunity credit
working condition (adj)
work site (2 words)
worldwide
write-in (n and adj)
write-off (n)
written plan (n, adj)

X

x-ray (adj)

Y

year 1, year 2, etc. (n, adj)

year-end (adj)(n)
year-to-date (adj)

Z

zero-basis (adj)
zero-percent (adj)

ORDERING FOR INDEX

(Include summaries ONLY with cases)

- a. **Subject** – Developed by indexer based on book content
- b. **Cases** – Case name only in italics; include summary of case in brackets and page number reference following summary (e.g., *Atkin v. Commissioner*, T.C. Memo. 2008-93 [A failed rollover of a SEP-IRA distribution is taxable and subject to penalties], 624)
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- d. **Treasury Regulations and Proposed Regulations** – Include all Treas. Reg. § and Prop. Reg. § references; *order should be by related section number (number FOLLOWING decimal)* [temporary regs (T included in citation) should be included here]; include full citation; insert comma before page reference
- e. **Revenue Rulings** – Rev. Rul. references and full citation (e.g., Rev. Rul. 99-6, 1999-1 C.B. 432); insert comma before page reference; put in order by year with all two digit years first (the year is shown following Rev. Rul.)
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