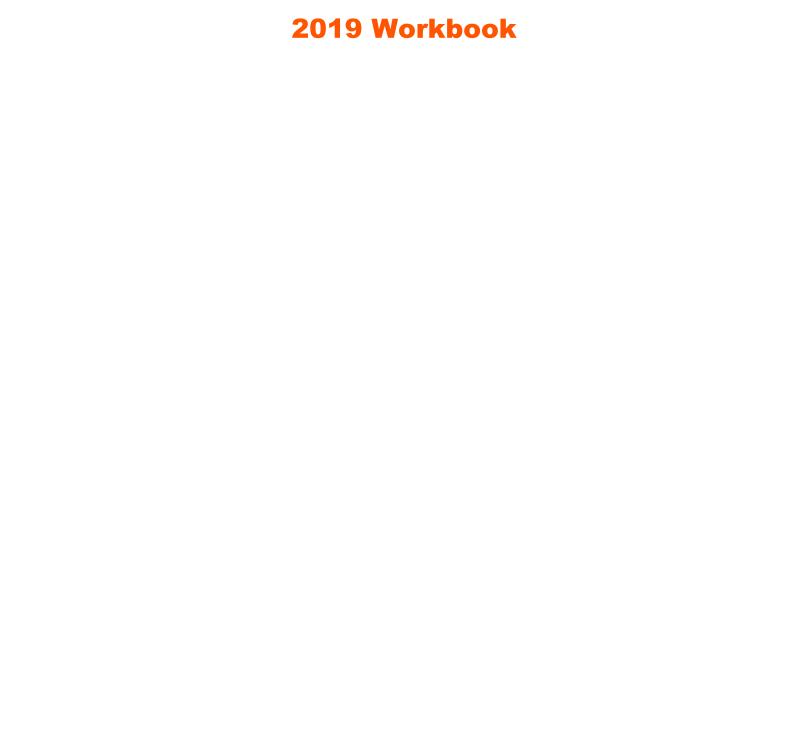
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This information was correct when originally published. It has not been updated for any subsequent law changes.

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Acronym Glossary

ABA	American Bar Association	CPC	Code of professional conduct
ACA	Affordable Care Act	CRP	Conservation reserve program
ACTC	Additional child tax credit	CTC	Child tax credit
ADS	Alternative depreciation system	DCN	Designated control number
ADSP	Aggregate deemed sale price	DDP	Due diligence penalty
AES	Advanced encryption standard	DFI	Deferred foreign income
AFS	Applicable financial statement	DNI	Distributable net income
AGI	Adjusted gross income	DOL	Department of Labor
AGUB	Adjusted grossed-up basis	DPAD	Domestic production activities deduction
AICPA	American Institute of CPAs	DRD	Dividend received deduction
ALE	Applicable large employer	DRP	Dividend reinvestment plan
AMT	Alternative minimum tax	DSA	Dual status alien
AMTI	Alternative minimum taxable income	DSR	Dual status resident
AOC	American opportunity credit	EA	Enrolled agent
AP	Accountable plan	EBHRA	Excepted benefits HRA
APA	Administrative procedure act	EBL	Excess business loss
APMA	Advanced pricing and mutual agreement	ECI	Effectively connected income
APTC	Advance premium tax credit	ECN	Exempt certificate number
AQEE	Adjusted qualified educational expenses	EEOC	Equal Employment Opportunity
ARC	Agricultural risk coverage		Commission
ATG	Audit technique guide	EFI	Elected farm income
BBA	Bipartisan Budget Act of 2018	EFIN	Electronic filing identification number
BIG	Built-in gains	EFTPS	Electronic federal tax payment system
CAA	Certified acceptance agent	EIC	Earned income credit
CBD	Cannabidiol	EIN	Employer identification number
CCA	Chief Counsel Advice	ENPI	Excess net passive income
CCC	Commodity Credit Corporation	ERISA	Employee Retirement Income Security Act
CCF	Capital construction fund	ERP	Effective reference price
CFC	Controlled foreign corporation	ERPA	Enrolled retirement plan agent
CFN	Customer file number	ESA	Education savings account
COGS	Cost of goods sold	ESBT	Electing small business trust
CPA	Certified public accountant	ESPP	Employee stock purchase plan
		LOII	Employee stock purchase plan

FAFSA	Free application for federal student aid	IAT	Integrated automated technology
FAQ	Frequently asked questions	ICHRA	Individual coverage HRAs
FAST	Fixing America's Surface Transportation	IDRP	Income-driven repayment plan
	Act	IP PIN	Individual preparer PIN
FATCA	Foreign Account Tax Compliance Act	IRA	Individual retirement arrangement
FDAP	"Fixed, determinable, annual or periodic"	IRC	Internal Revenue Code
FDIC	Federal Deposit Insurance Corporation	IRD	Income in respect of a decedent
FDII	Foreign-derived intangible income	IRM	Internal Revenue Manual
FEIE	Foreign earned income exclusion	IRS	Internal Revenue Service
FFRF	Freedom from Religion Foundation	ISO	Incentive stock option
FHE	Foreign housing exclusion	ITC	Investment tax credit
FICA	Federal Insurance Contributions Act	ITIN	Individual taxpayer identification number
FIFO	First-in, first-out	IVES	Income verification express service
FinCEN	Financial Crimes Enforcement Network	K-1	Schedule K-1
FMV	Fair market value	LIFO	Last-in, first-out
FRV	Fair rental value	LITC	Low income taxpayer clinics
FSA	Farm service agency	LLC	Limited liability company
FTC	Federal Trade Commission	LLC	Lifetime learning credit
FTC	Foreign tax credit	LLP	Limited liability partnership
FTD	Foreign tax deduction	MACRS	Modified accelerated cost recovery
FTE	Full-time equivalent		system
GAAP	Generally accepted accounting principles	MAGI	Modified adjusted gross income
GCI	General category income	MEC	Minimum essential coverage
GDS	General depreciation system	MFJ	Married filing jointly
GII	Gross investment income	MFP	Market facilitation payments
GILTI	Global intangible low-taxed income	MFS	Married filing separately
GLBA	Gramm-Leach-Bliley Act	MRPC	Model rules of professional conduct
HHS	Health and Human Services (U.S. Dept.	MSA	Medical savings account
	of)	MYA	Marketing year average
HIPAA	Health Insurance Portability and Accountability Act	NAEA	National Association of Enrolled Agents
НоН	Head of household	NAICS	North American Industry Classification Systems
HRA	Health reimbursement arrangement	NII	Net investment income
HSA	Health savings account	NIIT	Net investment income tax
IA	Installment agreement	NOL	Net operating loss
		TIOL	1 tot operating 1000

NPI	Nonpublic personal information	QOZF	Qualified opportunity zone fund
NPI	Net passive income	QP	Qualified property
NQSO	Nonqualified stock option	QPAI	Qualified production activities income
NRA	Nonresident alien	QSEHRA	Qualified small employer HRA
NSA	National Society of Accountants	QSO	Qualified stock options
OCC	Office of Chief Counsel	QSP	Qualified stock purchase
ODC	Other dependents credit	QSST	Qualified subchapter S trust
OIC	Offer in compromise	Qsub	Qualified subchapter S subsidiary
OPR	Office of Professional Responsibility	QTP	Qualified tuition program
OTI	Overall taxable income	QTR	Qualified tuition reduction
OVDP	Offshore Voluntary Disclosure Program	QTRE	Qualified tuition and related expenses
PAL	Passive activity loss	RA	Resident alien
PATH	Protecting Americans from Tax Hikes	REIT	Real estate investment trust
	(Act)	REPAYE	Revised pay as you earn
PCA	Private collection agency	RIC	Regulated investment company
PCI	Passive category income	RMA	Risk management agency
PCM	Percentage-of-completion method	RMD	Required minimum distributions
PCORTF	Patient-Centered Outcomes Research Trust Fund	RPC	Rules of professional conduct
PDC	Private debt collector	RPE	Relevant pass-through entity
PFIC	Passive foreign investment company	RREE	Rental real estate enterprise
PFS	Personal financial specialist	RSU	Restricted stock units
PL	Public Law	SALT	State and local taxes
PLC	Price loss coverage	SDOP	Streamlined domestic offshore procedures
PPR	Personal property rental	SE	Self-employment
PTC	Premium tax credit	SEP	Simplified employee pension
PTIN	Preparer tax identification number	SFC	Specified foreign corporation
PTP	Publicly traded partnership	SFFA	Specified foreign financial assets
QBI	Qualified business income	SFOP	Streamlined foreign offshore procedures
QBID	Qualified business income deduction	SFR	Substitute for return
QBL	Qualified business loss	SIMPLE	Savings incentive match plan for
QCD	Qualified charitable distribution		employees
QHEE	Qualified higher education expenses	SLR	Student loan repayment
QIP	Qualified improvement property	SOLC	Suspended ordinary loss carryover
QOF	Qualified opportunity fund	SRP	Shared responsibility payment

SSTB	Specified service trade or business	UBIA	Unadjusted basis immediately after acquisition
SSID	Service set identifier		•
SSN	Social security number	UBTI	Unrelated business taxable income
SSTB	Specified service trade or business	UNICAP	Uniform capitalization
STMT	Statement	UPE	Unreimbursed partner expense
TAIT	Treaty assistance and interpretation team	USCITC	United States-Canada Income Tax Convention
TCE	Tax counseling for the elderly	USDA	United States Department of Agriculture
TCJA	Tax Cuts and Jobs Act	VITA	Volunteer income tax assistance
TD	Treasury Decision		
TDS	Transcript delivery system	VPN	Virtual private network
TFA		WEP	Wired-equivalent privacy
IГА	Taxpayer First Act		
TFRP	Trust fund recovery penalty		
THC	Tetrahydrocannabinol		
TIGTA	Treasury Inspector General for Tax Administration		
TIN	Taxpayer identification number		
TTIN	Truncated taxpayer identification number		
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Quick Tips for Deciphering Citations

When reading cases and other legal materials, you will often encounter citations to other materials. While it may look overwhelming, it is really quite simple with the help of these tips.

Some examples of the types of citations you might see:

- Statute: 7 USC 1308 or 7 USC §1308
- Case: Bush v. Gore, 121 S.Ct. 525 (2000)

Here are some tips for finding these types of citations:

To determine what the abbreviation stands for, please reference the following table:

Abbreviation	Meaning
USC	United States Code
CFR	Code of Federal Regulations
AFTR	American Federal Tax Reporter
U.S. or S.Ct.	U.S. Supreme Court Reporter
F.2d or F.3d	Federal Reporter (Circuit Court of Appeals Opinions)
Fed.Appx.	Federal Appendix (Circuit Court Rulings)
F.Supp or F.Supp.2d	Federal Supplement (U.S. District Courts)
TC	U.S. Tax Court (Opinions)
TC Memo	U.S. Tax Court (Memorandum opinions)
TC Summ. Op.	U.S. Tax Court Summary Opinion
Fed.Cl. or Cl.Ct.	U.S. Court of Federal Claims
Bankr. or B.R.	Bankruptcy Court Reports
Aff'd	Decision affirmed by appellate court
Rev'd	Decision overturned by appellate court
Cert. denied	Appeal refused by U.S. Supreme Court

- The **number preceding** the abbreviation is:
 - Case: volume number
 - Statute: title number
- The **number following** the abbreviation is:
 - Case: page number where case or law review article starts
 - Statute: section number (may include a § symbol)
- Often, the **date** of the article or case decision is included in parentheses.

Using the examples above, they break down as follows:



