

PART I : INDIVIDUAL INCOME TAXATION

章番号	学習テーマ	問題集	CORE REG	TCP
第1章	Overview of Individual Income Tax (個人所得税の概要) CORE : REG	p.2	Q1~6 (6問)	—
第2章	Payment of Tax (納税方法) CORE : REG			
第3章	Filing Status (申告資格) CORE : REG	p.6	Q7~11 (5問)	—
第4章	Dependency Requirements (扶養家族の判定) CORE : REG	p.10	Q12~17 (6問)	—
第5章	Gross Income – Inclusions (総所得算入項目) CORE : REG	p.14	Q18~51 (34問)	—
第6章	Gross Income – Exclusions (総所得除外項目) CORE : REG	p.32	Q52~61 (10問)	—
第7章	Depreciation, Amortization, and Depletion (減価償却、無形資産の償却、減耗償却) CORE : REG	p.36	Q62~67 (6問)	—
第8章	Losses – Deductions and Limitations (損失の種類：控除における制限) CORE : REG TCP	p.40	Q68~73 (6問)	Q74~82 (9問)
第9章	Above The Line Deductions (調整総所得前控除) CORE : REG	p.50	Q83~96 (14問)	—
第10章	Below The Line Deductions (調整総所得後控除) CORE : REG	p.58	Q97 ~142 (46問)	—
第11章	Other Taxes (その他の税) CORE : REG TCP	p.82	Q143 ~146 (4問)	Q147 ~152 (6問)
第12章	Tax Credits (税額控除) CORE : REG	p.88	Q153 ~159 (7問)	—
第13章	Tax Procedures (税務手続き) CORE : REG	p.92	Q160 ~170 (11問)	—

計155問 計15問

1. Overview (Filing) & 2. Payment of Tax

計6問

CORE : REG Q 1~6

USCPA試験対策用に厳選問題を効率重視で下表の3つにランク分けしている。なお、Becker Online演習ソフトのMC問題を解かずとも、合格するために十分な演習問題数を日本語ポイント解説付きで掲載している。英文解説はBeckerが作成している。※下表はTAX用。

A ランク	基本問題 目標正答率：100%
B ランク	合否を分ける問題 ※複数の論点が併せて出題されている。 ※ひねりやひっかけが含まれている。 目標正答率：80%
C ランク	難問、奇問、出題頻度が低い問題 ※時間をかけないこと。 目標正答率：50%

1. MCQ-14712 □□ A

In evaluating the hierarchy of authority in tax law, which of the following carries the greatest authoritative value for tax planning of transactions?

- Internal Revenue Code.
- IRS regulations.
- Tax court decisions.
- IRS agents' reports.

2. TAC Original □□ B

Which of the following statements is true regarding the filing requirements for an individual taxpayer who dies during the current tax year?

- No individual income tax return need be filed for the year of their death.
- An individual income tax return should be filed prior to the end of the year (December 31) of death.
- An individual income tax return should be filed within 9 months of the date of death.
- An individual income tax return should be filed by April 15 of the year following their death.

3. MCQ-02084 □□ A

Krete, an unmarried taxpayer with income exclusively from wages, filed her initial income tax return for the 20X1 calendar year. By December 31, 20X1, Krete's employer had withheld \$16,000 in federal income taxes and Krete had made no estimated tax payments. On April 15, 20X2, Krete timely filed an extension request to file her individual tax return and paid \$300 of additional taxes. Krete's 20X1 income tax liability was \$16,500 when she timely filed her return on April 30, 20X2, and paid the remaining income tax liability balance. What amount would be subject to the penalty for the underpayment of estimated taxes?

- \$0
- \$200
- \$500
- \$16,500

4. MCQ-02098 □□ A

Chris Baker's adjusted gross income on her 20X1 tax return was \$160,000. The amount covered a 12-month period. For the 20X2 tax year, Baker may avoid the penalty for the underpayment of estimated tax if the timely estimated tax payments equal the required annual amount of:

- 90% of the tax on the return for the current year paid in four equal installments.
- 110% of prior year's tax liability paid in four equal installments.
 - I only.
 - II only.
 - Both I and II.
 - Neither I nor II.

1. MCQ-14712

Choice "a" is correct. The Internal Revenue Coder (IRC) holds the most authoritative value. Federal tax regulations give directions on how to apply the law outlined in the IRC. Regulations have the second most force and effect, second only to IRC.

【ポイント解説】

出題トピック	Internal Revenue Code
対応する章	Overview (Vol.1テキスト p.1) ※TAX 直前対策まとめ表紙

最も上位にある *Authority* (法源) は、当然ながら内国歳入法である。

- I. Internal Revenue Code : 内国歳入法
 II. Federal Tax Regulation : 連邦税法施行規則
 ※Treasury (IRS) Regulation : 財務省規則ともいう。
 III. Tax Court Decisions : 租税裁判所等の判例

※「TAX直前対策まとめ」とは、白い表紙の薄い冊子です。問題演習1回転目はこの冊子でポイントを確認しながら解いていきましょう。分からない時にだけテキストに戻ります(テキストは索引も活用し“辞書”として使ってください)。

2. TAC Original

Choice "d" is correct. A final individual income tax must be filed on behalf of a taxpayer who dies during the tax year. It is due on the same date if the taxpayer had not died.

【ポイント解説】

出題トピック	Filing
対応する章	PART I 第1章

納税者が年度の途中で死亡した場合も1月1日から死亡日までの所得を計算して申告義務があれば、申告と納税が必要となり、Form1040の申告期限は通常と同じで翌年の4月15日まで (calendar year採用の場合)。∴**選択肢"d"**が正解となる。
 <参考>PART VII Gift and Estate Taxation 第3章に参考として掲載しているが、連邦相続税申告書 (Form 706 : Estate Tax Return) の申告期限は、死亡日から9カ月以内となっている。

3. MCQ-02084

Choice "a" is correct. Provided the taxes due after withholdings were not over \$1,000, there is no penalty for underpayment of estimated taxes. Note that there would be a failure to pay penalty on the \$200 that was not paid until April 30.

【ポイント解説】

出題トピック	Estimated Tax Payment
対応する章	PART I 第2章

申告納税額が\$1,000未満の場合、「予定納税の過少納付(及び源泉徴収不足)による罰則金 (Underpayment penalty ; 前払不足の罰則金)」は課せられない。なお、用語が似ているのだが、「納税不足による罰則金 (Failure-to-file penalty) (※Tax delinquency penalty ともいう)とは異なるので注意しよう。

本問の問題設定をまとめると、以下のようになる。
 ・X1年度中の源泉徴収税額(前払い)=\$16,000。
 ・X2年4月15日に延長を申請。\$300を納税。
 ・X1年度の確定所得税額=\$16,500。
 ・X2年4月30日に申告書を提出。残\$200を納税。
 本問では、確定所得税額\$16,500ー源泉徴収税額\$16,000=\$500なので、「Underpayment penalty」は課されない。∴**選択肢"a"** : \$0が正解となる。
 4月15日の時点での未納税額\$200に対しては、「Failure-to-pay penalty」が原則としては課されることになる。
 延長後の期限内に申告書を提出しているため、「Failure-to-file penalty」は課されない。

4. MCQ-02098

Choice "c" is correct. Payment of lesser of the below two will provide "safe harbor" to taxpayers.
 I. Payment of 90% of the tax on the return for the current year avoids the penalty for underpayment of estimated tax.
 II. Payment of 110% of the prior year's tax liability avoids the penalty for underpayment of estimated tax when the taxpayer's AGI from the prior year exceeds \$150,000.

【ポイント解説】

出題トピック	Estimated Tax Payment
対応する章	PART I 第2章

前年度のAGIが15万ドルを超える高額所得者の場合、a) 当年度の納税見込額の90%もしくはb) 前年度の納税額の110%のいずれか小さい金額まで所得税を前払いしておけば、Underpayment penalty (前払不足の罰則金)を回避することができる。本問では、Baker氏の前年度のAGIは16万ドルであるため上記に該当する。いずれかなので、**選択肢"c"** : Both I and IIが正解となる。

5. MCQ-06884 **A**

Sam's Year 2 taxable income was \$175,000 with a corresponding tax liability of \$30,000. For Year 3, Sam expects taxable income of \$250,000 and a tax liability of \$50,000. In order to avoid a penalty for underpayment of estimated tax, what is the minimum amount of Year 3 estimated tax payments that Sam can make?

- a. \$30,000
- b. \$33,000
- c. \$45,000
- d. \$50,000

6. TAC Original **A**

In which of the following cases *may* a penalty be charged for underpayment of estimated taxes if their tax liability for the current year exceeds their estimated tax payments:

- a. The taxpayer had no tax liability for the prior year.
- b. The taxpayer's total estimated tax liability for the current year was less than \$1,000.
- c. The taxpayer had an Adjusted Gross Income of \$100,000 for the prior year, and they paid 100% of their prior year's tax liability in estimated payments.
- d. The taxpayer's Adjusted Gross Income for the prior year was \$180,000, and they paid 100% of their prior year's tax liability in estimated payments.

CORE : REG

Becker Online 演習ソフトに収録されている
直近10年分の AICPA リリース MC 問題は、
あえて当問題集巻末に年度ごとに分けて掲載し
ているが、**PART I 第1&2章**に対応する問題は以
下となる。近年の出題の傾向を把握しよう。
また、複数年サイクルで酷似問題が出題される
ことがあるので、直近10年分としている。

Released 2020 (p.442~) ⇒ **Q3**

Released 2024 (p.514~) ⇒ **Q9**

5. MCQ-06884

Choice “b” is correct. If the taxpayer had AGI in excess of \$150,000 in the prior year, 110% of the prior year's tax liability is used to compute the safe harbor for estimated payments (prior year's tax $\$30,000 \times 110\% = \$33,000$).

【ポイント解説】

出題トピック	Estimated Tax Payment
対応する章	PART I 第2章

※前問の解説を参照のこと。

本問の場合、Sam 氏の前年度の AGI が15万ドルを超える（Taxable income が17.5万ドルである）ため、a) $\$50,000 \times 90\% = \$45,000$ もしくは b) $\$30,000 \times 110\% = \mathbf{\$33,000}$ のいずれか小さい金額となるため、**選択肢“b”**が正解となる。

6. TAC Original

Choice “d” is correct.

【ポイント解説】

出題トピック	Estimated Tax Payment
対応する章	PART I 第2章

選択肢“d”：納税者の前年度の AGI は18万ドルであるため前年度の納税額の110%となるが、100%しか所得税を前払いしておらず、Underpayment penalty（前払不足のペナルティ）が課される。
∴**選択肢“d”**が正解となる。

なお、**選択肢“a”**：個人の納税者の場合、前年度の納税額がゼロであった場合にはそもそも予定納税を行う必要はない。

3. Filing Status

計5問

CORE : REG Q 7~11

7. MCQ-01404 A

Which of the following is (are) among the requirements to enable a taxpayer to be classified as a "qualifying widow(er)"?

- I. A dependent has lived with the taxpayer for six months.
- II. The taxpayer has maintained the cost of the principal residence for six months.
 - a. I only.
 - b. II only.
 - c. Both I and II.
 - d. Neither I nor II.

9. MCQ-05278 B

In which of the following situations may taxpayers file as married filing jointly?

- a. Taxpayers who were married but lived apart during the year.
- b. Taxpayers who were married but lived under a legal separation agreement at the end of the year.
- c. Taxpayers who were divorced during the year.
- d. Taxpayers who were legally separated but lived together for the entire year.

8. MCQ-04765 A

Parker, whose spouse died during the preceding year, has not remarried. Parker maintains a home for a dependent child. What is Parker's most advantageous filing status?

- a. Single.
- b. Head of household.
- c. Married filing separately.
- d. Qualifying widow(er) with dependent child.

7. MCQ-01404

Choice "d" is correct. The requirements that enable a taxpayer to be classified as a qualifying surviving spouse / qualifying widow(er) are:

- 1) The taxpayer's spouse died in one of the two previous years and the taxpayer did not remarry in the current tax year,
- 2) The taxpayer has a child who can be claimed as a dependent,
- 3) This child lived in the taxpayer's home for all of the current tax year,
- 4) The taxpayer paid over half the cost of keeping up a home for the child,
- 5) The taxpayer could have filed a joint return in the year the spouse died.

【ポイント解説】

出題トピック	Filing Status
対応する章	PART I 第3章

※次の問題の解説も参照のこと。

Qualifying surviving spouse / widow(er) の要件のなかで特に重要なのは、『1年間』、扶養家族である『子供』が同居していること。

Qualifying Widow(er) = Whole year

Head of Household = Half year

∴ **選択肢"d"** : **Neither I nor II** が正解となる。

8. MCQ-04765

Choice "d" is correct. A qualifying widow(er) is a taxpayer who may use the joint tax return standard deduction and rates for each of two taxable years following the year of death of his or her spouse, unless he or she remarries. The surviving spouse must maintain a household that, for the entire taxable year, was the principal place of abode of a son, stepson, daughter, or stepdaughter (whether by blood or adoption). The child must be considered either a qualifying child or a qualifying relative. Parker may file as a qualifying widow(er) because her spouse died in the previous tax year, she did not remarry, and she maintained a home for a dependent child. Because qualifying widow(er) is the most advantageous status and Parker qualifies, Parker would file as a qualifying widow(er).

【ポイント解説】

出題トピック	Filing Status
対応する章	PART I 第3章

Qualifying surviving spouse / widow(er) は、配偶者と死別し、次の要件をすべてを満たしている者が、配偶者の死亡年度後2年間に限って利用することができる申告資格である。夫婦合算申告(MFJ)と同じ税率表及び standard deduction を用いることができ優遇されている。

- a. Has not remarried at year end;
年度末の時点で再婚していないこと。
- b. Was qualified to file a joint return in the year of death;
配偶者の死亡年度に MFJ をする資格があったこと。
- d. Maintain principal residence for dependent child for the whole year
『1年間』、扶養家族である『子供』が同居していること。

Parker 氏は、前年度に配偶者が死亡しており、上記の要件を満たしているため、**選択肢"d"**が正解となる。

9. MCQ-05278

RULE: In order to file a joint return, the parties must be MARRIED at the end of the year.

Exception: If the parties are married but are **LEGALLY SEPARATED** under the laws of the state in which they reside, they cannot file a joint return (they will file either under the single or head of household filing status).

Choice "a" is correct. Per the above rule, taxpayers who are married but lived apart during the year are allowed to file a joint return for the year. The fact that they did not live together during the year has no bearing on the issue.

【ポイント解説】

出題トピック	Filing Status
対応する章	PART I 第3章

夫婦合算申告(MFJ)を用いるためには、年度末の時点で結婚している夫婦でなければならない。離婚(divorced)、法的に別居(legally separated)している場合は認められない。

∴ **選択肢"a"**の場合のみ、MFJを用いることができる。

10. Becker Practice **B**

Which of the following individuals could claim Head of Household filing status?

- I. A 32 year-old divorced mother of two children, both of whom resided with her for the entire tax year.
 - II. A 45 year-old widow whose spouse died in the prior tax year and who provided all expenses related to the principal residence of her mother for the tax year.
 - III. A 56 year-old widow whose spouse died during the current tax year and who provided a household that is the principal residence of her 15-year-old daughter.
 - IV. A single male who owns his own home and provides 100% of the support for his Aunt Martha, who resided with him for the entire tax year.
- a. I and III.
 - b. I only.
 - c. II and IV.
 - d. I, II, and IV.

11. Becker Practice **A**

A couple filed a joint return in prior tax years. During the current tax year, one spouse died. The couple has no dependent children. What is the filing status available to the surviving spouse for the first subsequent tax year?

- a. Surviving spouse.
- b. Married filing separately.
- c. Single.
- d. Head of household.

CORE : REG

直近10年分の AICPA リリース MC 問題のうち
PART I 第3章に対応する問題は以下となる。

Released 2015 (p.354~) ⇒ **Q9**

Released 2018 (p.406~) ⇒ **Q7**

Released 2019 (p.420~) ⇒ **Q9**

Released 2020 (p.442~) ⇒ **Q11**

Released 2021 (p.462~) ⇒ **Q24**

Released 2022 (p.480~) ⇒ **Q24**

10. Becker Practice

Choice "d" is correct. The individual in Item I would qualify because she maintained a home that was the principal residence of her two children for more than half the tax year. The individual in Item II would qualify because she is providing support for her mother. Note that she is not a qualifying widow because she does not maintain the household for a qualifying child. The individual in item III would file married filing joint in the year of the death of the spouse and would file as a qualifying widow for the subsequent two years. The individual in Item IV would qualify as head of household because he maintains a household that for more than half the taxable year is the principal residence of a dependent relative who resides with him (required for dependent relatives other than father or mother).

【ポイント解説】

出題トピック	Filing Status
対応する章	PART I 第3章

Head of household は、次の要件をすべて満たしている者が用いることができる申告資格である。

- a. 年度末に独身（みなし独身も含む）であること。※みなし独身規定とは、子供がいる納税者が、課税年度末の時点で法的に結婚していても MFS を選択するほかない状況にあり、その配偶者と年度の後半6カ月間別居している場合、独身としてみなすという規定である。
- b. 米国民または居住者であること。
- c. The individual maintains as his or her home a household that, for more than half the taxable year, is the principal residence of :
 - 『半年』超の期間、
 - (i) **Dependent Relative** (must **Live with**)
扶養家族である『親族』と同居していること。
 - (ii) **Dependent Child** (must **Live with**)
扶養家族である子供と同居していること。
 - (iii) **Dependent Parent** (*Not required to live with*)
扶養家族である親とは同居している必要はない。

本問の4人の納税者に関して Head of household の要件を満たしているかどうかを判断する。

- I. 左記の **Dependent Child** (must **Live with**) に該当する。
 - II. 左記の **Dependent Parent** (*Not required to live with*) に該当する。親とは同居している必要はない。※前年度に配偶者と死別しているが、子供がないため、Qualifying surviving spouse / widow(er) には該当しない。
 - III. 配偶者の死亡年度は MFJ を用いることができる。Head of household には該当しない。
 - IV. 左記の **Dependent Relative** (must **Live with**) に該当する。
- ∴ **選択肢"d" : I, II, and IV** が正解となる。

11. Becker Practice

Choice "c" is correct. For the first subsequent tax year (and all other subsequent tax years) after the death of a spouse with no dependent children, filing status is single.

【ポイント解説】

出題トピック	Filing Status
対応する章	PART I 第3章

配偶者の死亡年度は、MFJを用いることができる。本問では、配偶者の死亡年度の翌年の申告資格が問われている。扶養家族である子供（親族）がないので、Qualifying Surviving spouse及び Head of householdには該当しない。∴ **Single**が正解となる。