

DISCUSSION

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The authors of the two nonprofit papers have provided us with an informative discussion of two important Internal Revenue Service studies on private foundations and other tax-exempt organizations. The authors have dealt quite effectively with the historical background of this research, presented many interesting statistical results, and cited, as is appropriate at such meetings as this, the nature of the data's limitations.

In my role as a discussant today, I would like to focus briefly on three improvements that must be made if future work in this area is to be successful: better activity classification, sounder valuation of assets, and elimination of the double counting of receipts.

ACTIVITY CLASSIFICATION

Most users of exempt organization data are expected to be interested in data about a specific activity. As I see it, there is much less interest in aggregate figures representing the vast heterogeneous population of many types of activities brought together only because the organizations are tax-exempt and nonprofit. The greatest interest will center on philanthropic organizations. The philanthropic organizations differ in purpose and operations from other types of organizations such as membership organizations which benefit members rather than the general public. The nonprofit financial organizations have additional purposes and rationales for tax-exemption. Included also are such differing organizations as cemetery associations, veterans organizations, and the political parties. As one can see, many organizations serving different goals are included under the cloak of "tax-exemption." Generally, any interest in these organizations overall is related mainly to Treasury tax policy issues. Most users are expected to be interested in parts of this large heterogeneous universe.

Now the key to the parts is the "activity classification." But the activity classification has serious deficiencies, as described by the authors [1]. I would like to suggest that in future exempt organization studies, special effort be made to improve the structure of the activity classifications. The 1977 Census of Services made an important effort in this respect, and the same type of effort should be reflected in future SOI studies [2]. I suggest this with full realization of costs and limited resources. On that point, I believe the statistical community would prefer a smaller sample, but well stratified by activities. Certainly, the costs of better activity classification should be supported by trade-offs, such as reduced samples.

ASSET VALUATION

At present there is an allowance of flexibility in the reporting of the value of assets in the balance sheet information. Such flexibility is

a serious statistical limitation. One cannot really justify aggregation of values which are both book and current values for the same types of assets or for different assets, such as physical assets and financial holdings. The extent to which such aggregation occurs in the data is unknown. If it is extensive, then the usefulness of the IRS balance sheet data is questionable. If the practice is small, perhaps it can be ignored or adjusted. Some indication of the extent of the problem is warranted.

I would like to suggest in future exempt organization studies that the IRS report form require strict adherence to the reporting of either book value or current value for the detail of the balance sheet. The total assets figure should be reported both in book value and in current value.

DOUBLE COUNTING OF RECEIPTS

The problem of double counting is also serious. The problem occurs because certain tax-exempt organizations function as fundraisers for other tax-exempt organizations. As a consequence, there is double counting of receipts because the same funds are reported by the fundraisers and by the recipient service organizations. It is a problem which the 1977 Census of Services recognized in planning of the tax-exempt section of its Census [2]. The 1977 Census tried to avoid double counting of receipts by collecting information on operating expenditures of tax exempt organizations instead of receipts, on the assumption that receipts just cover expenditures in nonprofits. Consequently, the user of the data, particularly in the philanthropic area, must seek to adjust for double counting in receipts.

I suggest that in the future a mechanism be built into the 990 studies which would permit an adjustment for double counting. This mechanism could be specific identification of major fundraising entities in the activity classification and the specific reporting of intra-activity transfers which create double counting aggregation of receipts.

REFERENCES

- [1] Two classification schemes were included in the paper as originally presented: Statistics by the Subsection Code upon which the exemption was based, and by the "type of activity" in which the organization was engaged. For the Proceedings, type of activity was dropped since this information is featured in the Fall issue of the SOI Bulletin describing how the classification is structured and reported.
- [2] U.S. Department of Commerce, Bureau of the Census, 1977 Census of Service Industries, Part 4, West Region, Other Service Industries, U.S. Government Printing Office, January, 1981.