GAO

United States
General Accounting Office
Washington, D.C. 20548

General Government Division

B-272047

July 10, 1996

The Honorable Daniel R. Coats
United States Senate

Dear Senator Coats:

This letter responds to a request made during a meeting at your office on May 9, 1996. You requested information on program service expenses reported by 501(c)(3) tax-exempt organizations. Program service expenses are those expenses directly related to the exempt purposes of the organization. Charitable, religious, and educational organizations, tax-exempt under Internal Revenue Code (IRC) section 501(c)(3), are known collectively as charities. Specifically, you requested information on certain charitable organizations' program services expenditures as a percentage of their total expenses. In addition, you requested a listing of all penalties for 501(c)(3) organizations, including intermediate sanctions as proposed as part of the H.R. 2337, Taxpayer Bill of Rights legislation. This list of penalties is included in the enclosure.

## SCOPE AND METHODOLOGY

Our analysis of the organizational expense data is based on information from 1992 Internal Revenue Service (IRS) long form 990 returns filed by 121,627 charitable organizations that reported expenses. We used IRS' Statistics of Income (SOI) sample data from 1992. SOI develops statistical samples, which we used to make estimates about the population of charitable organizations that file Form 990 returns. Our analysis does not include tax-exempt organizations that are not required to file, such as churches and other religious organizations. Also, it does not include Form 990-EZ filers, which are organizations with revenues under $100,000 and assets under $250,000.

Program service expenses, as defined by IRS, include primarily expenses for those activities that the reporting organization was created to conduct and which form the basis for the organization's exemption from tax. Total expenses include program services, management and general expenses, and



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fundraising. Management and general expenses include such items as general legal services, accounting, personnel and other centralized services. Fundraising expenses are those that are incurred in soliciting contributions, gifts, and grants. To develop the list of penalties, we reviewed the IRC and proposed legislation.

We conducted our review in May 1996 in accordance with generally accepted government auditing standards.

## RESULTS

The results of our analysis of expenditures are presented in table 1. We estimate that the percentage of expenses allocated to program services for those organizations filing was about 86 percent of total expenses for 1992. As a percentage of their total expenses, more than 60 percent of these charitable organizations had program service expenses of 80 percent or greater.

Table 1: Percentage of Total Expenses Allocated to Program Services for Charitable Organizations Filing Form 990 for 1992

| **Program services as a percentage of total expenses** | **Number of organizations** | **Percentage of organizations** | **Cumulative percentage** |
|---|---|---|---|
| Greater than or equal to 90 percent | 45,620 | 38% | 38% |
| Greater than or equal to 80 percent but less than 90 percent | 29,214 | 24 | 62 |
| Greater than or equal to 70 percent but less than 80 percent | 18,817 | 15 | 77 |
| Less than 70 percent | 27,976 | 23 | 100% |
| **Total** | **121,627** | **100%** | |

Source: IRS Statistics of Income.

AGENCY COMMENTS

On June 28, 1996, we discussed a draft of this letter with IRS officials including the Director, Exempt Organization Division. They generally agreed with the accuracy of the information in the draft. We incorporated their suggested technical changes.

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Copies of this letter are being sent to the Commissioner of Internal Revenue, and other interested parties. We will also make copies available to others upon request.

If you have any questions or we can be of further assistance, please call me at (202) 512-9044.

Sincerely yours,

Natwar M. Gandhi
Associate Director, Tax Policy
and Administration Issues

Enclosure

## EXISTING AND PROPOSED PENALTY PROVISIONS AND EXCISE TAXES FOR TAX-EXEMPT ORGANIZATIONS

Tax-exempt organizations are subject to several penalties and excise taxes under the Internal Revenue Code (IRC). The following is a list of the generally applicable penalties organized by existing IRC section and the intermediate sanctions proposed in H.R. 2337.

### Penalties Relating to Returns Required of Tax-Exempt Organizations, Including Form 990, Return of Organization Exempt From Income Tax

1. IRC § 6652(c)(1)(A) provides a penalty for organizations that fail to file a complete Form 990 on the date (including extensions) and in the manner prescribed, with the information required under IRC § 6033. The penalty is $10 per day, not to exceed the lesser of $5,000 or 5 percent of the organization's gross receipts for the year with respect to any one return. The penalty is due only upon notice and demand by the Service. No penalty is due if the organization establishes that the failure to file a timely return was due to reasonable cause.

2. IRC § 6652(c)(2)(A) provides a penalty for a terminating organization that fails to file a return required by IRC § 6043(b). The penalty is $10 per day for each day during which the failure to file continues, up to a maximum penalty for any one return of $5,000. This penalty is also subject to the exception for reasonable cause.

3. IRC §§ 6652(c)(1)(B) and 6652(c)(2)(B) provides for a penalty to be imposed on the person or persons responsible for the failure to file a Form 990 or a return required by IRC § 6043(b) in response to the Service's written demand. The penalty is $10 for each day during which the failure continues after the date specified in the demand. The total amount imposed on all persons responsible for the failure, with regard to any one return, may not exceed $5,000. For this purpose, a responsible person is any officer, director, trustee, employee, or other individual who is under a duty to comply with the demand. A reasonable cause exception applies.

4. IRC § 6652(c)(1)(C) provides that if an organization fails to permit public inspection of its Form 990 as required by IRC § 6104(e), the person failing to meet that requirement must pay a penalty of $10 for each day during which the failure continues, up to a maximum penalty with regard to any one return of $5,000.

5. IRC § 6652(c)(1)(D) provides that if an organization fails to permit public inspection of the exemption application as required by IRC § 6104(e)(2), the person failing to meet that requirement must pay a penalty of $10 per day for each day

during which such failure continues. There is no limit on the total amount of the penalty.

Penalties Relating to Income Tax Returns, including Form 990-T and Form 990-PF

1. IRC § 6651(a)(1) provides a penalty for late filing of returns. IRC § 6651 applies to Forms 990-T and 990-PF. The penalty is 5 percent of the tax required to be shown on the return, if the failure is for not more than 1 month, with an additional 5 percent for each additional month or fraction during which the failure continues. The aggregate penalty may not exceed 25 percent. The penalty will not be imposed if the organization can show that the failure was due to reasonable cause and not due to willful neglect.

2. IRC § 6651(f) provides that if the failure to file is due to fraud, the penalty is increased to 15 percent of the tax required to be shown on the return for each month or part of a month that the organization fails to file. The aggregate penalty may not exceed 75 percent.

3. IRC § 6651(a)(2) provides for a penalty for the failure to pay the tax shown on the return. The penalty is .5 percent of the tax shown on the return, if failure is not for more than 1 month, with an additional .5 percent for each additional month during which the failure continues. The aggregate penalty may not exceed 25 percent. There is a reasonable cause exception if the failure is not due to willful neglect.

4. IRC § 6651(a)(3) provides a penalty if any tax required to be shown on the return, but not shown, is not paid within 10 days after the date of a notice and demand by the Service for payment of such additional tax. If the failure is for not more than 1 month, the penalty is .5 percent of such tax, with an additional .5 percent for each additional month. The aggregate penalty with respect to a return may not exceed 25 percent. IRC § 6651(d) increases the penalty to 1 percent per month under certain conditions. There is a reasonable cause exception if the failure is not due to willful neglect.

5. IRC § 6662 provides for a penalty on accuracy related underpayments that result from: (1) negligence or disregard; (2) a substantial understatement of income tax; (3) a substantial income tax valuation misstatement; (4) a substantial overstatement of pension liabilities; or (5) a substantial estate or gift tax valuation understatement. The penalty is imposed on an understatement of income tax that exceeds the greater of 10 percent of the tax required to be shown on the return, or $5,000. The penalty is 20 percent of the underpayment. Under IRC 6664(c), the

penalty is not imposed if the taxpayer acted in good faith and with reasonable cause.

6. IRC § 6663(a) provides a penalty of 75 percent of any underpayment of tax attributable to fraud.

7. IRC § 6655(g)(3) provides a penalty for failure to make estimated payment of the Unrelated Business Income Tax (UBIT) and certain taxes applied to private foundations.

<u>Penalties Relating to Various Requirements Imposed on Tax-Exempt Organizations</u>

1. IRC § 6710 provides for a penalty of $1,000 for each day that an organization fails to meet the requirements of IRC § 6113 with regard to fund-raising solicitations. There is a maximum penalty on failure by any organization during any calendar year of $10,000. IRC § 6710(c) provides that if an organization intentionally disregards the requirements of IRC § 6113, the penalty will be the greater of $1,000 or 50 percent of the aggregate cost of the solicitation for each day. The $10,000 limit does not apply in the case of intentional disregard. There is a reasonable cause exception.

2. IRC § 6711(a) provides for a penalty for IRC § 501(c) or (d) organizations that fail to disclose due to intentional disregard of the IRC § 6711 requirement that certain information or services provided by it are also available from the federal government for not more that a nominal charge. The penalty for each day on which the failure occurs is the greater of $1,000 or 50 percent of the aggregate cost of the offers and solicitations that occurred.

3. IRC §6714 provides for a penalty of $10 per contribution against the recipient organization that fails to meet the requirements of IRC §6115 regarding the disclosure requirement applicable to quid pro quo contributions. There is a reasonable cause exception.

4. IRC § 6685 provides for a penalty of $1,000 upon any IRC § 501(c) or (d) organization that is required to comply with the requirement relating to the availability of Form 990, Form 990-PF, or exemption applications for public inspection and willfully fails to so comply.

<u>Criminal Penalties</u>

1. IRC § 7207 provides sanctions for willful delivery or disclosure to the Service of any return or other document known to be materially false or fraudulent. The

section provides for a fine of not more than $10,000 ($50,000 in the case of a corporation) and/or imprisonment for not more than 1 year. The section also provides a penalty for furnishing for public disclosure a Form 990, Form 990-PF, or exemption application that is known to be materially false or fraudulent.

2. IRC § 7206(1) provides that any person who willfully makes and subscribes a return, statement, or document, under penalty of perjury, that he does not believe to be true and correct as to every material matter shall be guilty of a felony and, upon conviction, shall be fined not more than $100,000 ($500,000 in the case of a corporation) and/or imprisoned not more than 3 years.

3. IRC § 7206(2) provides that any person who willfully assists in, procures, counsels or advises the preparation of a return or other document that is fraudulent or false as to any material matter shall be guilty of a felony and, upon conviction, shall be fined not more that $100,000 ($500,000 in the case of a corporation) and/or imprisoned for not more than 3 years.

4. IRC § 7201 provides that any person who willfully attempts to evade or defeat federal tax or its payment will be guilty of a felony and, upon conviction, may be fined not more than $100,000 ($500,000 in the case of a corporation) and/or imprisoned not more than 5 years.

5. IRC § 7202 provides that any person required to collect, account for, and pay over federal tax, who willfully fails to do so, may be convicted of a felony and fined not more than $10,000 and/or imprisoned not more than 5 years.

6. IRC § 7203 provides that any person required to pay tax or estimated tax, to make a return (other than an estimated tax declaration) to keep any records, or to supply any information, who willfully fails to do so at the time required, will be guilty of a misdemeanor and upon conviction, may be fined not more than $25,000 ($100,000 in the case of a corporation) and/or imprisoned not more than 1 year.

<u>Penalties for Lobbying and Political Activities</u>

1. IRC § 4911 provides for a 25-percent excise tax on the excess lobbying expenditures of public charities that make the 501(h) election. Excess lobbying expenditures are lobbying expenditures or grass roots expenditures that exceed the organization's lobbying nontaxable amount. If both lobbying expenditures and grass roots expenditures exceed the lobbying nontaxable amount, then the tax is imposed on the greater of the two. Special rules apply when an organization that is part of an affiliated group has excess lobbying expenditures.

2. IRC § 4912(a) provides for an excise tax on an organization that has lost its tax-exempt status due to lobbying expenditures. The tax is equal to 5 percent of the amount of the expenditures. The section does not apply to churches, private foundations, and organizations electing the lobbying limitation under § 501(h).

3. IRC § 4912(b) provides that a manager who agreed to the making of any lobbying expenditure knowing it was likely to result in loss of exemption be subject to an excise tax of 5 percent of the expenditure. There is an exception if the agreement is not willful and is due to reasonable cause. The burden of proof is on the IRS in establishing that the manager knowingly agreed to the lobbying expenditure.

4. IRC § 4955 provides for a excise tax on public charities that make campaign expenditures of two types. The first is any amount paid or incurred in any participation in, or intervention in (including the publication or distribution of statements), any political campaign on behalf of (or in opposition to) any candidate for public office. The second is an amount expended by an organization that has been formed primarily for the purpose of promoting the candidacy or prospective candidacy of an individual, or that is controlled by a candidate or prospective candidate and that is availed of primarily for that purpose. The term political expenditure means amounts paid for speeches; travel expenses of the individual; expenses of conducting polls, surveys, or other studies; expenses of advertising, publicity, and fundraising; and any other expense that has the primary effect of promoting public recognition, or otherwise primarily accruing to the benefit of such individual.

   The first-tier tax on the organization is 10 percent of the amount of the political expenditure. If the expenditure is not corrected within a specified period, an additional tax of 100 percent is imposed. IRC § 4962 provides that the 10-percent tax may be abated if the taxable event was not willful and flagrant and the event was corrected within the correction period. IRC § 4955 also provides for a 2.5 percent tax to be imposed on an organization manager who agrees to the making of any expenditure, knowing that it is a political expenditure, unless the agreement is not willful and flagrant. If the tax is not corrected and the 100-percent tax is imposed on the organization, and the manager refuses to agree to any part of the correction, he is liable for a 50-percent tax. The maximum amount of first-tier tax on a manager for any one political expenditure is $5,000, and the maximum additional tax is $10,000.

   Correction is defined as the recovery of the expenditure to the extent possible, establishment of safeguards to prevent further expenditures, and when full recovery is not possible, additional actions as prescribed by regulation.

5. IRC § 7409 provides for an action to enjoin flagrant political expenditures of a § 501(c)(3) organization. The action may be brought if the Service has warned the organization of its intention to seek an injunction if the making of political expenditures does not immediately cease, and if the Commissioner has personally determined that the organization has flagrantly participated in or intervened in any political campaign and that injunctive relief is appropriate. The court may enjoin further political expenditures and provide any other injunctive relief to ensure that the assets of the organization are preserved for charitable purposes.

Excise Taxes Applicable to Private Foundations

1. IRC § 4945 provides for an excise tax on "taxable expenditures" of private foundations. A taxable expenditure is any amount paid (1) to carry on propaganda, or to attempt to influence legislation; (2) to influence the outcome of any specific public election or to carry on any voter registration drive; (3) as a grant to another organization other than a public charity unless the foundation exercises expenditure responsibility; (4) as a grant to an individual for travel, study or similar purposes by such individual; or (5) for any purpose other than one specified in IRC § 170(c)(2)(B). These include religious, charitable, scientific, literary, or educational purposes.

   The first-tier excise tax on the private foundation is 10 percent and is imposed on each taxable expenditure made by the private foundation. A 2.5-percent tax is imposed on the foundation manager who has agreed to the making of the taxable expenditure, knowing that it is a taxable expenditure, unless the agreement is not willful and flagrant. IRC § 4945(b) imposes a second-tier excise tax of 100 percent of the expenditure if the expenditure is not corrected within a certain period. A tax of 50 percent of the taxable expenditure is applied to the foundation manager who refuses to agree to part or all of the correction.

   Correction is defined to mean, with respect to any taxable expenditure, recovering part or all of the expenditure to the extent recovery is possible, and when full recovery is not possible, such additional corrective action as is prescribed by regulations. The maximum tax that may be imposed on all foundation managers for a single taxable expenditure is $5,000 for the first-level tax and $10,000 for the second-level tax.

2. IRC § 4941 provides for a tax on each act of self-dealing between a disqualified person and a private foundation. The first-tier tax is 5 percent of the amount involved with respect to the act of self-dealing for each year in the taxable period. The tax is imposed on any disqualified person or foundation manager who participates in the act of self-dealing. A tax at the rate of 2.5-percent is imposed

on a foundation manager (acting only in his capacity as foundation manager) who participates in an act of self-dealing between a disqualified person and the private foundation. The tax is imposed on the foundation manager only if the foundation manager knows that the act is an act of self-dealing and the participation is willful and not due to reasonable cause. Second-tier taxes in the amount of 200 percent of the amount involved are imposed if the act of self-dealing is not corrected within a specified period. If the foundation manager refuses to agree to part or all of the correction, then there is imposed a tax equal to 50 percent of the amount involved. The maximum tax on management is $10,000 for the first-tier tax, and an additional $10,000 with respect to the additional taxes for any one act of self-dealing.

Self-dealing is defined to include a number of transactions between private foundations and disqualified persons, including (1) sales or exchanges, or leasing of property; (2) lending of money; (3) furnishing of goods or services, and payment of compensation. Exceptions are spelled out, such as when the lending of money is without interest or other charge or when there is payment of compensation that is not excessive. A disqualified person is defined in IRC § 4946 (a) to include a substantial contributor, a foundation manager, or other insiders.

3. IRC § 4942 provides for an excise tax on private foundations that fail to distribute accumulated income. The distribution requirements do not apply to private operating foundations, organizations that spend substantially all of their income directly for the charitable purpose for which they were set up and that meet one of three other requirements concerning devotion of assets to charitable purposes, derivation of support, and distributions in active conduct of exempt activities.

   Private foundations must annually distribute the sum of their adjusted minimum investment return and certain other amounts. The minimum investment return is equal to 5 percent of the foundation's net investment assets. Distributions that qualify in meeting the minimum payout include distributions to public charities, direct expenditures for charitable purposes, and expenditures for assets to be used for charitable purposes.

   A first-tier tax of 15 percent applies to the private foundation's undistributed income not distributed within the year received or within the next succeeding tax year. A second-tier tax, equal to 100 percent of the remaining undistributed income, is imposed if the foundation fails to make the necessary charitable distributions within a certain period.

4. IRC § 4943 provides for an excise tax if a private foundation jointly owns business enterprises with disqualified persons and the holdings are not divested within a

required period. A disqualified person is defined as in § 4946. A private foundation generally may hold 20 percent of the voting stock of a functionally unrelated corporation, reduced by the percentage of stock owned by all disqualified persons. If third parties have effective control of the business, the foundation may own up to 35 percent of the voting stock of such corporation, similarly reduced. The private foundation may own nonvoting stock only if all of the disqualified persons do not own more than 20 percent of the voting stock. Special grandfather rules apply when the stock was owned on May 26, 1969, the date the law was enacted. The IRC § 4943 rules do not apply when the private foundation owns an interest in a functionally related business, or a business in which at least 95 percent of the income is from passive sources.

The first-tier tax on excess business holdings is 5 percent of the value of the greatest amount of excess holdings during the year. A second-level tax of 20 percent may be imposed if the excess holdings are not disposed of within a specified period.

5. IRC § 4944 provides for an excise tax on investments by a private foundation that jeopardize the carrying out of any of the foundation's exempt purposes. Investments that jeopardize a foundation's exempt purpose are those that show a lack of ordinary business care and prudence in providing for the long- and short-term financial needs of the foundation for it to carry out its exempt function. The first-tier sanction is a 5-percent tax of the invested amount on the foundation and a 5-percent tax of such amount on the foundation manager who participates in the investment knowing that it is jeopardizing the carrying out of the foundation's exempt purposes, unless his participation is not willful and is due to reasonable cause.

   A second-tier tax of 25 percent of the invested amount may be imposed on the foundation if the jeopardy situation is not corrected within a specified period. The second-tier tax on the foundation manager is 5 percent of such amount.

6. IRC § 507 provides for a tax on termination of a private foundation through an involuntary termination of its private foundation status because of the organization's willful and repeated acts, or willful and flagrant act giving rise to liability under the private foundation excise tax provisions, IRC § § 4040-4948. The tax is equal to the lower of (1) all the tax benefits received by the foundation and any of its substantial contributors or (2) the value of its net assets.

7. IRC § 4961 allows private foundations that are subject to second-tier excise taxes under IRC § § 4941-4945 and organizations that incur second tier excise taxes on political expenditures under § 4955 voluntarily to correct the transactions that gave

rise to the second-tier tax. If correction takes place within a specified correction period, the tax will be abated or refunded.

8. IRC § 4962 provides the Service with discretionary authority to not assess or to abate the private foundation excise taxes, except the tax on self-dealing, if it is established that the violation was due to reasonable cause and not to willful neglect and the event was corrected within the correction period.

9. IRC § 6684 provides that if any person becomes liable for tax under any section of chapter 42 by reason of any act or failure to act that is not due to reasonable cause and, either (1) such person has theretofore been liable for tax under such chapter, or (2) such act or failure to act is both willful and flagrant, then such person shall be liable for a penalty equal to the amount of such tax.

Proposed Intermediate Sanctions

H.R. 2337, the Taxpayer Bill of Rights 2, contains provisions that would extend private inurement prohibitions to 501(c)(4) social welfare organizations and impose intermediate sanctions on 501(c)(3) and 501(c)(4) organizations for excess benefit transactions. The bill would also impose additional filing and public disclosure rules. The administration's 1997 budget proposal contains similar provisions.

1. §1311 (a) of the bill would impose penalty excise taxes as an intermediate sanction in cases where § 501(c)(3) or 501(c)(4) organizations engage in "excess benefit transactions." The intermediate sanctions would be imposed by the Service in lieu of, or in addition to, revocation of the organization's tax exempt status. An "excess benefit transaction" would be one in which a disqualified person (insider) engages in a non-fair-market-value transaction with an organization or receives unreasonable compensation, and financial arrangements (to the extent provided in Treasury Regulations) under which a disqualified person receives payment based on the organization's income in a transaction that violates the present-law private inurement prohibition.

2. §1311 (b) of the bill would also amend section 501(c)(4) to provide that a social welfare organization would be eligible for tax-exempt status only if no part of its net earnings inures to the benefit of any private shareholder.

   A "disqualified person" would be any individual who is in a position to exercise substantial influence over the affairs of the organization. A disqualified person who benefits from an excess benefit transaction would be subject to a first-tier penalty tax equal to 25 percent of the amount of the excess benefit. The excess benefit would be the amount by which a transaction differs from fair market value or the amount of compensation exceeding reasonable compensation, or the amount of a prohibited transaction based on the organization's gross or net income. Organization managers who knowingly participate in an excess benefit transaction would be subject to a first-tier penalty tax of 10 percent of the amount of the excess benefit (subject to a maximum penalty of $10,000).

IRS would be authorized to impose second tier taxes of 200 percent of the amount of excess benefit on a disqualified person if there is no correction of the excess benefit transaction within a specified period.

3. §1312 of the bill would amend § 6033 of the Code to require that exempt organizations disclose on their Form 990 additional information on disqualified persons, excess benefit transactions, and any other excise taxes paid during the year on excess lobbying expenditures, disqualifying lobbying expenditures, and political expenditures.

4. §1313 of the bill provides that a tax-exempt organization that is subject to the public inspection requirement of present-law section 6104(e) would be required to comply with requests made in writing or in person from individuals who seek a copy of the organization's Form 990 or the organization's application for recognition of tax-exempt status.

5. §1313 of the bill would also increase the § 6685 penalty for willful failure to allow public inspections or provide copies of returns from $1,000 to $5,000.

6. §1314 of the bill would increase the penalty imposed on a tax-exempt organization that either fails to file a Form 990 in a timely manner or fails to include all required information. The penalty would be $20 for each day the failure continues (with a maximum penalty with respect to any one return of the lesser of $10,000 or 5 percent of the organization's gross receipts). Organizations with annual gross receipts exceeding $1 million would be subject to a penalty of $100 per day, with a maximum penalty of $50,000 per return. As under current law, there would be an exception for reasonable cause.

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