

# Private Foundation Returns, 1986 and 1987

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Between 1986 and 1987, the total revenue of private foundations dropped an estimated 14.5 percent, from \$20.0 billion to \$17.1 billion, while the fair market value of their total assets grew just short of 1 percent, from \$113.2 billion to \$114.3 billion [1,2,3]. In real terms, total revenue decreased by 17.2 percent and real asset values actually declined by 2.1 percent [4]. In comparison, between 1985 and 1986, revenue and assets grew by nominal rates of 22.0 percent and 16.6 percent, respectively [5].

## CHANGES IN FOUNDATION REVENUE, ASSETS, AND GRANTS, 1986-1987

The decrease in total revenue from 1986 to 1987, coupled with a 9.6-percent increase in total expenses, resulted in a decline in "excess of revenue over expenses" of nearly 32 percent [6]. In fact, the amount of the excess of revenue over expenses was less for 1987 than it had been for each of the 2 preceding years. Figure A shows both real and nominal percentage changes in selected asset, revenue, and expense items, from 1985 to 1986 and from 1986 to 1987.

**Figure A. — Percentage Changes in Selected Financial Items, 1986 to 1987**

Item	Percentage change			
	Current dollars		Constant dollars <sup>1</sup>	
	1985 to 1986	1986 to 1987	1985 to 1986	1986 to 1987
	(1)	(2)	(3)	(4)
Fair market value of total assets . . . . .	+16.6%	+1.0%	+13.6%	-2.1%
Total revenue . . . . .	+22.0	-14.5	+18.9	-17.2
Net gain (less loss) from sales of assets . .	+36.4	-20.4	+32.9	-22.8
Contributions received .	+31.0	-26.1	+27.6	-28.4
Total expenses . . . . .	+14.3	+9.6	+11.4	+6.3
Grants paid . . . . .	+18.3	+9.1	+15.3	+5.8
Excess of revenue over expenses . . . . .	+28.2	-31.6	+24.9	-33.7

<sup>1</sup>The GNP implicit price deflator was used to adjust for inflation.

The decline in total revenue between 1986 and 1987 can be attributed to a 20.4-percent decrease in net gain (less loss) from sales of assets (primarily securities) and a 26.1-percent drop in contributions, gifts and grants received [7]. These factors contributed to the decline in the real value of foundation assets for 1987. This is in sharp contrast to the 36.4-percent increase in net gain (less loss) from sales of assets and the 31.0-percent increase in contributions, gifts and grants received from 1985 to 1986.

Despite the lower asset and revenue growth rates for private foundations for 1987, grant payments rose by 9.1 percent to \$6.8 billion. For 1986, grant payments totalled \$6.2 billion, an increase of 18.3 percent from 1985. The increase for 1987 can be explained, in part, by a 7.2 percent increase in net investment assets and, therefore, in the minimum amount (5 percent of net investment assets, plus or minus certain adjustments) that foundations were required to pay out for 1987. Net investment assets are calculated by averaging the monthly holdings of noncharitable-use assets over the foundation's annual accounting period, whereas total assets are the foundation's holdings at the end of the accounting period. The stock market crash in October 1987 explains the discrepancy between the growth in net investment assets and the growth in total assets for 1987.

Another explanation for the higher rate of increase in grants paid, compared to the rates of increase in revenue and assets, is that large foundations (which account for a large portion of grants paid) typically do not make grants solely on the basis of the current year's earnings or investment performance. They usually plan their grantmaking budgets prior to the fiscal year during which the grants are made.

In addition, corporations often set up foundations to help stabilize their annual grantmaking. While corporate contributions to a "company-sponsored" foundation are usually related to the profits of the corporation, i.e., more

corporate giving occurs in "good" years than in "bad," the foundation has the ability to maintain and control its endowment so that a steady flow of grants is provided, even when corporate profits are down. (For a further discussion of foundation giving, see the "Assets, Distributions, and Decision-Making" section.)

## OVERVIEW AND EXPLANATION OF PRIVATE FOUNDATIONS

A private foundation is a nonprofit, tax-exempt corporation, association or trust which is narrowly supported and controlled, usually by an individual, family, or corporation, as opposed to an organization receiving broad support from a large number of sources within the general public. It is this narrow base of support and control which differentiates a private foundation from a publicly supported tax-exempt organization, although both receive tax exemption under Internal Revenue Code section 501(c)(3) [8]. Because of the centralized support and control, private foundations are more strictly regulated than other section 501(c)(3) organizations.

Most private foundations must pay an excise tax on investment income. Some "operating foundations" are exempt from this tax. (For example, 24 percent of the operating foundations, or 2 percent of all foundations, claimed an exemption from this excise tax on their 1987 returns.) All private foundations are subject to additional excise taxes if they engage in certain prohibited activities (deemed not to be in the public interest); e.g., failure to distribute the required minimum payout after the one-year grace period to do so, or attempts to influence legislation, such as lobbying or participating in the campaign of a candidate for public office. And, individual income tax deductions for contributions to "nonoperating foundations" are generally more restrictive than deductions for contributions made to operating foundations or other section 501(c)(3) organizations.

The two types of private foundations, "operating" and "nonoperating," are distinguished by the form of charitable support they provide. Nonoperating foundations generally provide indirect charitable support by making grants to other section 501(c)(3) organizations that actually conduct charitable programs [9]. Nonoperating foundations are required each year to distribute, by the end of the following year, a minimum amount for charitable purposes, based on the value of their net investment assets. Operating foundations provide direct support by actively conducting charitable programs or activities, and are not subject to a payout requirement. However, they have to expend a minimum

amount each year for their direct involvement in tax-exempt charitable activities (as opposed to the payout of grants in support of such activities). They also have to meet one of three tests based on assets, endowment, or sources of support, to continue to qualify as operating foundations [10]. Although operating foundations are not subject to the annual payout requirement, many choose to make grants in addition to carrying on charitable programs of their own.

Of the 35,907 organizations filing private foundation information returns for 1987, 91 percent were nonoperating foundations and the remaining 9 percent were operating foundations, virtually the same as for 1986. Approximately 30,000 were grantmaking foundations. About 87 percent of the nonoperating foundations and 46 percent of the operating foundations made grants for 1987. For 1986, the percentages of nonoperating and operating foundations making grants were 81 percent and 44 percent, respectively.

For 1987, about 30 percent of the nearly 6,000 nongrantmaking foundations were operating foundations, which are not required to make grants. Another 25 percent were nonoperating foundations that had no "distributable amount" and, therefore, were not required to make a minimum distribution. Some of the remaining nongrantmaking foundations were "failed public charities" that had been reclassified as nonoperating foundations. Many failed public charities continued to operate direct charitable programs rather than make grants to other tax-exempt organizations [11]. Nonoperating foundations that did not fully make the required distribution for 1987 had, by law, until the end of their 1988 accounting periods to do so without any tax penalty.

From 1982 to 1987, the number of foundations increased by 26 percent. This compares to a 6-percent increase from 1974 to 1982. This difference may result from a variety of factors such as the recognition of social needs in light of domestic budget cuts during the 1980's, changes in the tax-deductibility of donations, and the effects of the Economic Recovery Tax Act of 1981 (ERTA).

The wealthiest foundations--those with assets whose fair market value was \$100 million or more--numbered less than 0.5 percent of all foundations for 1987, but held slightly more than half of all foundation assets. Only 3.6 percent of all private foundations had assets worth \$10 million or more, but they accounted for nearly 80 percent of all assets. The group of foundations considered to be small in size--with less than \$1 million in assets--accounted for 80 percent of all foundations, but only 4.8 percent of aggregate total assets.

Half of the top ten private foundations, ranked by asset size (Figure B), saw a decrease in the 1987 end-of-year value of their assets and six realized less revenue for 1987 than for 1986. While they form only a small fraction of the universe of private foundations, these foundations held approximately 20.7 percent of all assets and accounted for 11.7 percent of total revenue for 1987.

### IMPACT OF STOCK MARKET CONDITIONS AND 1986 TAX REFORM ACT

The October 1987 stock market plunge and the reactions of individual and corporate donors to the tax law

changes legislated under the Tax Reform Act of 1986 (TRA) may have affected foundation revenue and assets for 1987. Combined, it appears that they had a negative impact on net gain (less loss) from sales of assets, contributions received, and the real market value of investments in securities for 1987.

Decreases in aggregate net gain (less loss) from sales of assets and in contributions received were jointly responsible for the drop in total revenue, while a decline in the real market value of foundation securities, which made up 76.4 percent of total foundation assets for 1987, was largely responsible for the overall decline in asset

#### Figure B

#### Top Ten Domestic Foundations Ranked by Size of Fair Market Value of Total Assets, 1986 and 1987<sup>1</sup>

[Money amounts are in millions of dollars]

Name	Location	Total assets 1987	Total assets 1986	Total revenue 1987	Total revenue 1986
Ford Foundation	New York	\$5,087	\$5,543	\$ 339	\$ 692
J. Paul Getty Trust <sup>2</sup>	California	3,982	4,141	295	420
W. K. Kellogg Foundation Trust <sup>3</sup>	New York	2,812	3,471	112	151
John D. and Catherine T. MacArthur Foundation	Illinois	2,436	2,426	202	217
Robert Wood Johnson Foundation	New Jersey	1,910	1,804	194	178
Lilly Endowment, Incorporated	Indiana	1,792	1,730	72	54
Rockefeller Foundation	New York	1,667	1,606	291	379
Andrew W. Mellon Foundation	New York	1,522	1,521	181	140
Pew Memorial Trust	Pennsylvania	1,437	1,477	178	167
Kresge Foundation	Michigan	<u>1,046</u>	<u>1,047</u>	<u>141</u>	<u>329</u>
<b>Total</b>		<b>\$23,692</b>	<b>\$24,765</b>	<b>\$2,005</b>	<b>\$2,727</b>

<sup>1</sup>A foundation is considered "domestic" if it is organized in the United States; however, this does not necessarily imply that all of its activities or grant recipients are domestic.

<sup>2</sup>J. Paul Getty Trust is an operating foundation. All other foundations listed are nonoperating foundations.

<sup>3</sup>The W.K. Kellogg Foundation Trust has a "pass-through" relationship with the W.K. Kellogg Foundation, located in Michigan. Typically, the entire amount of the annual "qualifying distributions" of the W.K. Kellogg Foundation Trust are made in the form of a grant to the W.K. Kellogg Foundation, which redistributes the grant for charitable purposes (and does not count the redistribution as a qualifying distribution of its own). Together, the two organizations had combined total assets of \$3.6 billion for 1986 and \$2.9 billion for 1987.

NOTE: Detail may not add to total because of rounding.

growth. Mainly due to the drastic drop in the market value of various stock holdings which occurred during October 1987, the end-of-year aggregate value of investments in securities for 1987 increased by only 0.4 percent, from \$87.0 billion to \$87.4 billion. After adjusting for inflation, the aggregate fair market value of securities held by foundations at the end of their 1987 tax periods was actually 2.7 percent lower than the year before.

The relatively low post-October 1987 market value of certain stocks probably influenced foundations to defer selling them until a later date when their value might increase. In addition to the negative effect that postponed sales of capital assets had on foundation revenue for 1987, it appears that foundations also sustained heavier losses from those assets that they did sell. The net gain, alone, from sales of assets decreased from \$7.0 billion to \$5.7 billion, while net losses nearly tripled, from \$49.8 million to \$147.9 million. Furthermore, the number of foundations reporting a net gain for 1987 decreased slightly, and those reporting a net loss increased by almost two-thirds.

The severity of the declines in the real fair market value of securities may also have deterred both individuals and corporations from forming new foundations or from making large gifts of stock to foundations at the end of their 1987 tax periods. The devalued stock would not have provided as sizable a charitable contribution or tax deduction, and donations may have been postponed to a future date when market conditions would improve. Gifts of stock actually made to foundations during 1987, whose value was less than those made for 1986, also may account for some of the decrease in the amount of total contributions received between the 2 years.

Changes in marginal corporate and individual tax rates which became effective under TRA may also have had a strong impact on individual and corporate charitable giving during 1986 and 1987. (However, there were offsetting factors which made more individual and corporate income taxable starting with 1987 [12].) With lowered individual and corporate tax rates, the actual tax benefit from making a charitable contribution became comparatively less for 1987 than for 1986 [13]. Given this situation, many contributors may have taken advantage of the higher 1986 tax rates by accelerating their contributions into 1986, and contributing less or not at all to private foundations in 1987. The 26-percent decrease in the total contributions received by foundations from 1986 to 1987, when compared to the 31-percent increase from 1985 to 1986, is consistent with this proposition.

Donors also may have been encouraged to make gifts of stock to foundations before 1987, because of the TRA provision relating to contributions of appreciated property. Because donations of appreciated stock to nonoperating foundations were allowed to be deducted at fair market value, the excess of this value over its "cost" could be subject to the revised "alternative minimum tax" (as a "tax preference" item) starting with 1987.

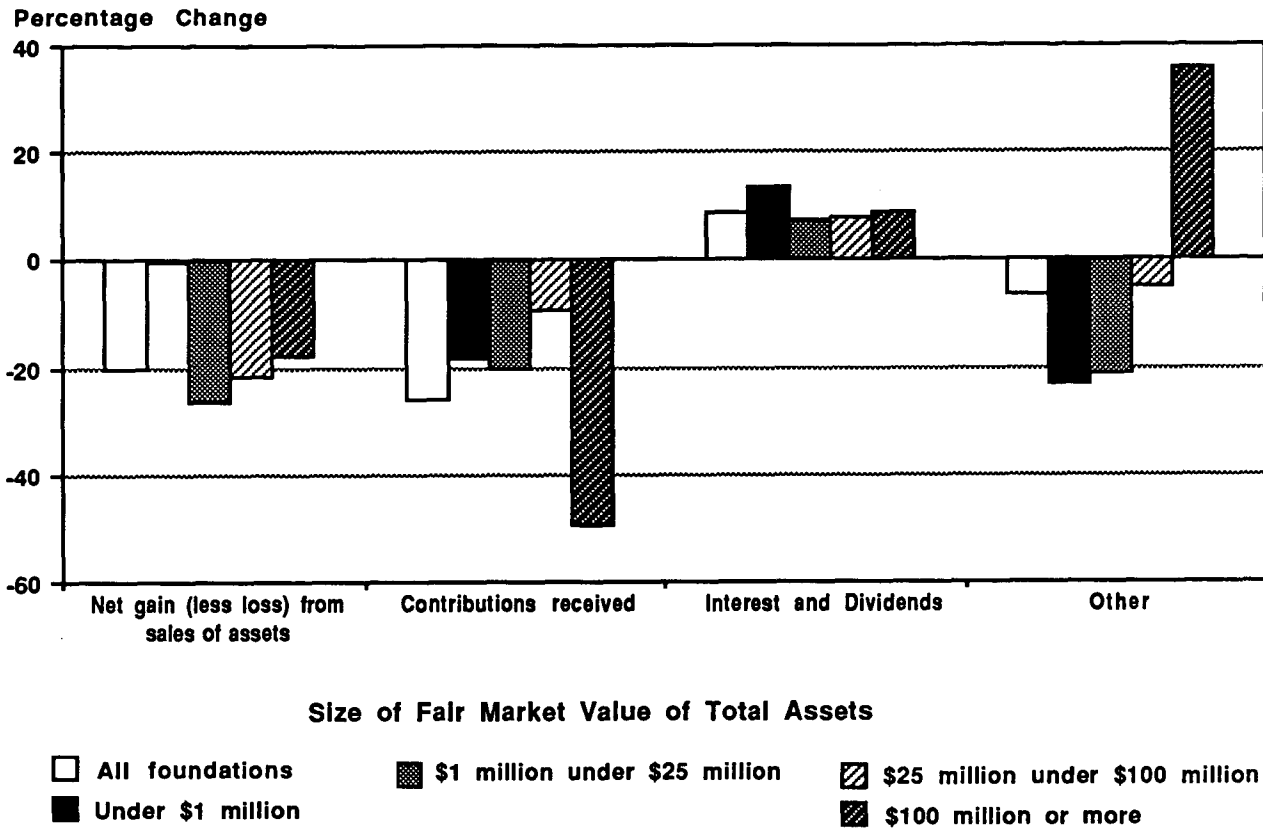
To an unknown extent, these changes under TRA may have contributed to the decline for 1987 in both the total number of individuals and corporations reporting a deduction for charitable contributions and in the amounts they claimed. The number of individual income tax returns with charitable deductions declined by 12.2 percent, while the amount of the deduction dropped by 7.8 percent [14,15]. In the case of corporations, the number of returns with charitable deductions declined by 5.6 percent, while the deduction itself dropped by 3.8 percent [16,17].

The decline in the charitable deductions reported by individuals for 1987 can also be attributed, in part, to the introduction of more liberalized standard deductions introduced under TRA and the repeal of the charitable contributions deduction for individuals who used the standard deduction rather than itemized deductions. However, these two changes probably had little effect on the donations made to private foundations.

## COMPONENTS OF REVENUE

By far, the largest sources of total foundation revenue for 1987 were interest and dividends (from securities, savings, and temporary cash investments), net gain (less loss) from sales of assets, and contributions received. Together, these items accounted for 96 percent of total revenue for 1987 (individually, each comprised around a third). This was typical, based on preceding years. As discussed earlier, total contributions received by foundations and aggregate net gain (less loss) realized on sales of assets both decreased between 1986 and 1987. This held true for each of the asset-size groups illustrated in Figure C. This chart shows the percentage change in each major component of revenue, from 1986 to 1987, for all foundations and for each category of foundation grouped by asset-size. Interest and dividends were the only revenue sources that increased across all size classes. Revenue from sources other than the three major components was relatively small and the percentage changes in this "other" category varied greatly among the different size groups.

**Figure C**  
**Percentage Changes in Revenue Sources, 1986 to 1987**



As can be seen from Figure D, the portions of revenue comprised of both "contributions received" and "investment income" vary as the asset size increases [18]. Contributions received was a more significant part of the revenue of smaller foundations, while the opposite was true for larger foundations.

The smaller the size of the foundation, the more it relies on contributions received for its giving programs. As foundation size increases, contributions received play a lesser role in giving, and investment income becomes a more important revenue source. Figure D emphasizes this point, showing that the total grants of the largest foundations (assets of \$100 million or more) were over three times larger than the total contributions they received, but less than half of their investment income, suggesting that the amount they gave out was not strongly related to the amount of contributions received. In contrast, the total grants of the smallest foundations (assets of less than \$1 million) were 177 percent of their

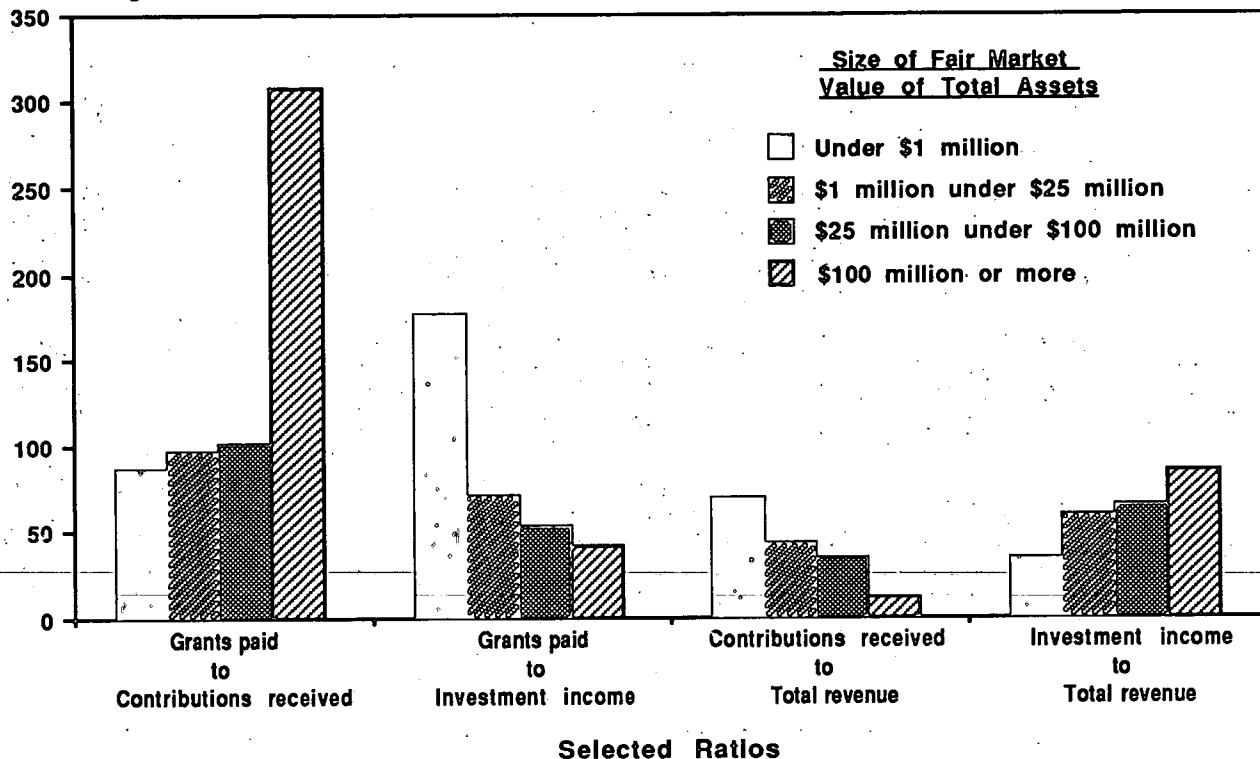
investment income, but only 88 percent of contributions received, suggesting that this asset-size group's giving is not highly dependent upon its investment income.

### COMPONENTS OF ASSETS AND INVESTMENTS

For both 1986 and 1987, foundation investments in securities, primarily corporate stocks and bonds, and government obligations, represented over three quarters of the fair market value of total assets, equaling \$87.4 billion for 1987 and \$87.0 billion for 1986. Total year-end investment assets (defined below) comprised over 92 percent of total assets in both years and equaled \$105.8 billion and \$104.4 billion, for 1987 and 1986, respectively. Total foundation assets equaled \$114.3 billion for 1987, and \$113.2 billion for 1986. In real terms, total investments in securities declined between 1986 and 1987 by 2.7 percent, total investments by 1.8 percent, and total assets by 2.1 percent. The decreases resulted largely from the stock market crash in October 1987. These

**Figure D**  
**Grants Paid, Contributions Received, and Investment Income Ratios,**  
**1987**

Percentage



changes compare dramatically with the large real gains from 1985 to 1986. Between these 2 years, total investments in securities increased by 13.0 percent, total investments by 13.5 percent, and total assets by 13.6 percent.

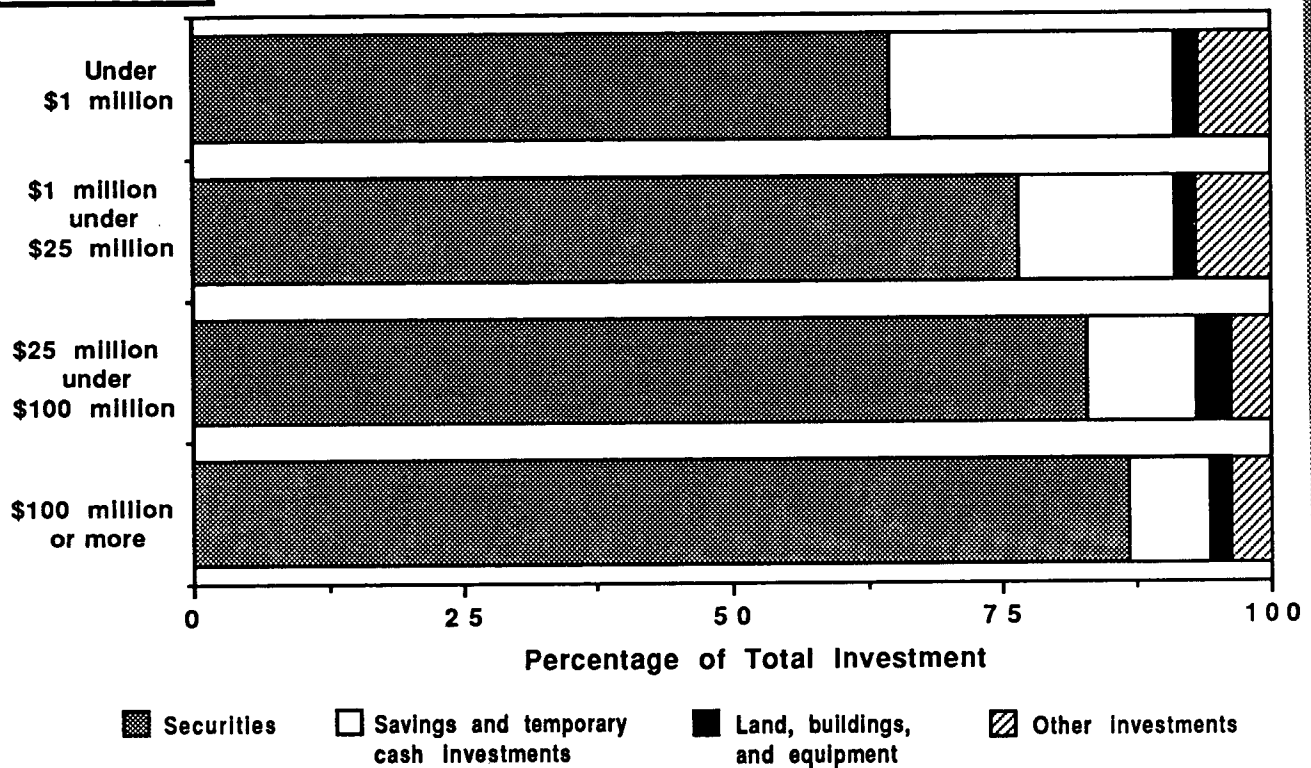
Total investment assets include savings and temporary cash investments; securities; land, buildings, and equipment; mortgage loans; and "other" investments, such as bank certificates, cash values of life insurance, and art. These investment assets represent end-of-year values and are to be distinguished from the average of non-charitable-use (net investment) assets on which the required charitable payout amount is based. Investments in securities represented 83 percent of total investment assets for both 1986 and 1987, and savings and temporary cash investments, 10 percent. Figure E depicts the composition of investment assets for 1987 for each of the different asset size groups. The proportions were similar for 1986.

Regardless of whether a foundation was operating or nonoperating, trends in asset composition varied with differences in the size of the foundation. The larger a foundation, the greater the amount and percentage of investments in securities and the smaller the percentage of savings and temporary cash investments. Although this particularly applies to nonoperating foundations, it applies to operating foundations as well. For 1987, total investment securities as a percentage of total investment assets varied from 65 percent for the smallest foundations (under \$1 million in assets) to 87 percent for the largest foundations (\$100 million or more in assets). Likewise, holdings of savings and temporary cash investments as a percentage of total investment assets for 1987 varied from 26 percent for the smallest foundations to 7 percent for the largest.

Different asset composition for the small and large foundations helps to explain the different growth rates in

**Figure E**  
**Composition of Investment Items, by Size of Foundation, 1987**

Size of Fair Market  
 Value of Total Assets



the fair market value of total assets for both groups. For instance, from 1982 to 1987, the smallest foundations realized a 27.3-percent real increase in assets, while the largest foundations realized an 80.9-percent increase, almost three times as large. A greater proportion of assets held as securities by the larger foundations, along with different investment and distribution goals, to be discussed later, led to this result. However, due to the decline in the stock market and a greater dependence by larger foundations on investments in securities, the largest foundations experienced a 2.6-percent real loss in the fair market value of total assets from 1986 to 1987, while the smallest ones actually realized a 4.3-percent real gain.

Nonoperating foundations and operating foundations each tend to hold a slightly different mix of investment assets. Nonoperating foundations held 84 percent of their investment assets as securities in 1986, and 83 percent in 1987. Operating foundations held fewer invest-

ment assets as securities, 78 percent for 1986, and 74 percent for 1987. This difference lies primarily in holdings of savings and temporary cash investments and in charitable-use land, buildings, and equipment.

During 1987 operating foundations realized greater losses than did nonoperating foundations. Their total assets declined by 11 percent in real terms, as compared to a 1 percent decline in nonoperating foundation assets. Likewise, real investments in securities for these groups declined by 12 percent and 2 percent, respectively. This may result from less emphasis placed on investment portfolio management by operating foundations.

While nonoperating foundations held 10 percent of investment assets as savings and temporary cash investments in both years, operating foundations held 13 percent in 1986, and 17 percent in 1987. In terms of charitable-use (rather than investment-use) land, buildings, and equipment, operating foundations held a rela-

tively large proportion for use in the execution of their own charitable programs. For 1986, these foundations held over 16 percent of total assets as charitable-use land, buildings, and equipment; and for 1987, over 12 percent. Nonoperating foundations, conversely, held only 1 percent in both years. Operating foundations reported significant decreases in the value of land, buildings, and equipment between 1986 and 1987. Investment and charitable-use land, buildings, and equipment decreased by 44 and 32 percent, respectively. Nonoperating foundations reported little or no decrease in their holdings of land, buildings, and equipment.

### THE PAYOUT REQUIREMENT

Under the Tax Reform Act of 1969 (TRA69), nonoperating foundations were required for the first time to pay out an annual minimum amount for charitable purposes. The charitable amount could, and still can, be distributed by the end of the tax return year following the year in which it was required to be paid. The payout requirement was established in order to prevent the accumulation of tax-exempt assets without a corresponding distribution for charitable purposes. TRA69 required that nonoperating foundations calculate the required charitable payout, the "distributable amount," by basing it on the greater of either current "adjusted net income" or a fixed percentage of the average value of noncharitable-use (net investment) assets, the "minimum investment return" [19]. Later, the Economic Recovery Tax Act of 1981 (ERTA) changed the way that these foundations calculated the distributable amount by eliminating the adjusted net income criterion. ERTA required that foundations use 5 percent of non-charitable-use assets to compute the amount, without regard to the adjusted net income.

In effect, for the years immediately following the enactment of ERTA, the distributable amount declined for many foundations after using the new method. In 1982 and 1983, respectively, 75 and 71 percent of foundations had lower distributable amounts than would have been the case under the law prior to ERTA. Of these foundations, in 1982 and 1983, respectively, 46 and 45 percent, especially the larger foundations, reacted to lower distributable amounts by paying out less than would have been required under the law prior to ERTA. Through the changes enacted under ERTA, policymakers hoped to allow foundations a greater opportunity to maintain (and even to increase) the value of their endowments. An increase in the value of the endowments would, in effect, increase the long-run giving power of foundations, thus increasing long-run charitable distributions. Over the 1982-1987 period charitable distributions increased by a real rate of

38 percent, a large increase in comparison to the 5 percent real change from 1974-1982.

The changes implemented under ERTA allowed foundations more investment flexibility in terms of factors such as type of assets and risk. Since the measurement based on assets, rather than on current income, encompasses both realized income and unrealized appreciation or depreciation in the value of the assets, it better measures the entire endowment. Previously, the calculation based on current adjusted net income measured only realized changes to the endowment. Prior to ERTA, those foundations earning high adjusted net income in relation to the minimum investment return on assets had higher distributable amounts than if the unrealized changes in their endowment had also been used in the final computation of the required distributable amount.

This was particularly true for the years immediately preceding ERTA, when inflation rates were relatively high. During this inflationary period, many foundations that based their distributable amount on their adjusted net income, rather than on minimum investment return, experienced an erosion of their endowment over time. Therefore, ERTA seemed to lead to a more favorable investment environment, particularly for the smaller foundations, which tend to hold a greater proportion of fixed income yield investments that earn proportionately high realized (adjusted net) income [20]. These investments resulted in relatively high distributable amounts for the smaller foundations prior to ERTA. However, the data indicate that the larger foundations, rather than the smaller, tended to take advantage of the change in the payout requirement enacted under ERTA. The larger foundations distributed proportionately less after ERTA, and then reinvested more. The smaller foundations did not tend to significantly readjust their investment and distribution patterns. As illustrated earlier in Figure D, the amount of charitable distributions made by the small foundations tends to be based more upon the amount of contributions received than the amount of investment income.

ERTA has helped foundations to increase the value of their assets, thereby increasing their ability to give charitably. The largest foundations, accordingly, have realized the largest percentage and absolute increases in both assets and distributions since ERTA. Despite the decline in the real value of foundation assets from 1986-1987, the total fair market value of assets of nonoperating foundations increased by 56 percent in real terms from 1982-1987. This represents a large increase in comparison to the 22-percent real increase in the Gross Na-



tional Product (GNP). The increase in foundation assets from 1982-1987 also compares dramatically to the erosion of aggregate real asset value sustained by foundations in the decade leading up to ERTA, a 31.0-percent decline from 1972-1981 [21]. Since ERTA, the significant increase in assets has enabled the foundation sector to maintain or increase endowment size for future giving. Although ERTA led to decreased distributions in the years immediately following 1981, by 1987 foundations had increased real qualifying distributions considerably, by 38 percent.

Since only nonoperating foundations are required to fulfill the charitable payout requirement, the data that follow, including the payout rates, rates of total return, income yields, and percentage changes in assets and distributions, unless otherwise indicated, represent only nonoperating foundations. These organizations comprise over 90 percent of foundations in both number and total assets. Also, it should be noted that oftentimes, a foundation's performance isn't measured until after the end of its current fiscal year. In these cases, the foundation can take advantage of the 1-year grace period for meeting the payout requirement by making their corresponding charitable distributions by the end of the following fiscal year. The rates of total return, income yields, and percentage changes and dollar amounts all have been adjusted for inflation.

## THE PAYOUT RATE

To examine the charitable distribution trends of private (nonoperating) foundations, rates of payout performance were calculated. To calculate the payout rate the amount

of (adjusted) qualifying distributions was divided by the amount of the monthly average of (noncharitable-use) net investment assets [22]. Payout trends for selected years from 1974-1987 show that the payout percentage declines as the size of the foundation increases (Figure F). Smaller foundations tend to give out a larger percentage of their asset base, sometimes to an extent exceeding their return on investments. Larger foundations tend to reinvest proportionately more of their earnings, consequently distributing a smaller proportion for charitable purposes in any given year. The median payout rates for all sizes of foundations either equal or exceed the 5-percent charitable payout requirement.

In light of ERTA, the aggregate median payout rate changed in a not unexpected pattern from 1974-1986. From 1974-1982 it increased from 8.4 percent for 1974 to 9.7 percent for 1982 [23]. From 1982-1983 the rate declined to 8.2 percent and then, for 1986, further declined to 6.9 percent. The downward trend after 1982 indicates that after ERTA foundations may have adjusted to the new law by paying out a smaller percentage of their assets. The total median rate then increased slightly to 7.0 percent for 1987. This occurred despite the stock market's sharp decline in October 1987.

Poor stock market conditions contributed to foundations earning much lower rates of return on their investments in 1987. The low returns, discussed later, coupled with the payout rates, led to a 1-percent decline in 1987 in the real fair market value of foundation assets. The end-of-year market value of assets for many foundations declined while total qualifying charitable distributions increased, although at a slower rate than in the past. The

Figure F. — Nonoperating Foundation Payout Rates, Selected Years, 1974-1987

Size of fair market value of total assets	Median payout rates					
	1974	1982	1983	1985	1986	1987
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Total</b> . . . . .	<b>8.39%</b>	<b>9.69%</b>	<b>8.23%</b>	<b>7.44%</b>	<b>6.87%</b>	<b>7.03%</b>
<b>Small foundations</b>						
\$1 under \$1,000,000, total . . . . .	8.72	9.98	8.66	8.03	7.42	7.52
\$1 under \$100,000 . . . . .	10.94	10.67	9.76	8.30	10.23	9.63
\$100,000 under \$1,000,000 . . . . .	7.25	9.03	8.03	7.61	6.49	6.66
<b>Medium foundations</b>						
\$1,000,000 under \$50,000,000, total . . . . .	6.43	8.19	6.69	6.05	5.62	5.70
\$1,000,000 under \$10,000,000 . . . . .	6.50	8.37	6.79	6.23	5.63	5.74
\$10,000,000 under \$50,000,000 . . . . .	5.84	7.23	6.05	5.51	5.39	5.40
<b>Large foundations</b>						
\$50,000,000 or more, total . . . . .	5.91	6.62	5.34	5.32	5.00	5.08
\$50,000,000 under \$100,000,000 . . . . .	n.a.	6.68	5.67	5.64	5.11	5.17
\$100,000,000 or more . . . . .	n.a.	6.45	5.00	5.10	5.00	5.02

n.a. - not available

NOTE: Data were available only for the years 1974, 1982, 1983, 1985, 1986, and 1987. Data for both the \$50,000,000 under \$100,000,000 and the \$100,000,000 or more categories were not available for 1974.

average value of noncharitable-use (net investment) assets, on which the payout requirement is based, also increased at a slower rate than in previous years. Since distributions increased at a faster rate than assets, a slight increase in the payout rate resulted in 1987 [24]. Due, in part, to prior grantmaking commitments and high returns realized in 1986, foundations did not tend to readjust their payout rates downward in 1987.

For 1987, 71 percent of all foundations distributed more for charitable purposes than required by the payout law. The smaller foundations, in particular, are more likely to exceed the payout requirement by a greater percent. Those foundations with less than \$1 million in assets represent the only group with a payout rate greater than the total median rate for all of the years shown. This occurred, in part, since the amount of noncharitable-use assets held by small foundations tends to represent a smaller proportion of total assets than for the larger foundations. Also, small foundations receive a relatively large amount of charitable contributions and then often act as a conduit by redistributing them within a year. In this manner, the amount of contributions received by foundations each year affects the amount of grants that they distribute. For instance, the decline in the median payout rate from 1986 to 1987 for those foundations with under \$100,000 in assets, may have resulted, in large part, from the drop in contributions received. Due to different distribution patterns and goals, the smaller foundations most often realize higher payout rates.

Comparing the amount of charitable distributions actually given with the required amount, for 1987, 35 percent of foundations distributed more than double the required payout amount while 13 percent distributed over ten times that amount. As expected, a majority of these foundations were in the smaller asset size categories. Distributions exceeded the required amount by 291 percent in the case of foundations with under \$1 million in assets. This compares with 46 percent for all foundations. These characteristics are representative of foundation behavior after the enactment of ERTA.

## INVESTING BEHAVIOR

### Rate of Total Return

In order to fund charitable activity, most often in the form of grantmaking, a foundation invests its endowment to realize a return on assets that fulfills the 5-percent charitable payout requirement. To fulfill the payout requirement without an erosion of the endowment, a foundation must engage in skillful investment and risk management in order to realize a rate of return equal to 5

percent plus the rate of inflation. Sound investment management will often enable a foundation to support a stable or growing endowment which will secure a permanent existence for the foundation as a charitable organization. For this reason, foundations do have the incentive to maximize their return on investments. Although they do not distribute dividends or income to shareholders, and thus, are not accountable in this manner, they are indirectly accountable to a strong donor desire to perpetuate the endowment of the foundation.

A comparison of the payout rate to the rate of total return helps to explain changes in the relative growth or decline of foundation assets from year to year. The rate of total return formula measures the change in the value of the entire asset base with consideration for inflows and outflows of money. It accounts for the realized income from the assets (investment and otherwise) as well as the unrealized capital appreciation of the endowment [25]. (The net investment income yield, or "NII" yield, examined later, shows only the realized gain or loss from investment assets.)

The rates of total return for 1983-1987 (Figure G) indicate that the median rate of return tends to differ from the median payout rate. Although larger foundations distribute proportionately less than smaller foundations, the rate of return tends to increase as the size of the foundation increases. The larger foundations hold a greater proportion of their assets as investment securities and seem to invest more with the goals of capital appreciation and long-term giving. These foundations also possess the necessary resources to seek the assistance of sophisticated investment consultants. These organizations tend to maintain a greater proportion of lower-income yield, higher-risk, and higher-growth common stock [26]. Since these types of holdings appreciate faster, higher rates of total return for the larger foundations result. The smaller foundations seem to invest with the intention of distributing relatively large charitable contributions currently. This group tends to hold lower risk and higher, fixed-income yield assets that do not appreciate nearly as rapidly [27]. This results in lower relative returns for these foundations.

Foundations realized high rates of total return from 1983 to 1986 (Figure G). Market conditions during these years proved very favorable to investors. For 1983, the largest foundations (those with \$100 million or more in assets) earned a real rate of 11.7 percent and for 1986, 13.9 percent. After accounting for the relatively low inflation from 1983 through 1986, all of these size groups show a rate of return on assets well above the 5-percent payout requirement. The 1987 data, however, show different

investment results. After inflation, foundations earned well under the minimum desired 5 percent rate of return. For instance, the largest foundations earned only 1.4 percent. This resulted, in large part, from the sharp stock market decline in October 1987.

During the years 1983-1986, foundations, as an aggregate, realized substantially higher returns than payout rates. This contributed to the growth of aggregate foundation assets. However, for 1987, foundations with \$1 million or more in assets, as a group, paid out more for charitable purposes than what they earned as total returns on assets. This led to the decline in the value of aggregate foundation assets from 1986 to 1987. It will prove interesting to evaluate 1988 data to ascertain whether or not foundations adjusted their payout percentages downward in response to the unusually low 1987 returns.

### Income Yield

While the rate of total return measures the change in the value of the entire endowment, the income yield measures only the realized investment income earned by a foundation. The net investment income yield, or NII yield, is calculated by dividing net investment income by the end-of-year fair market value of investment assets. Investment assets include savings and temporary cash investments; securities; land, buildings and equipment; mortgage loans; and "other" investments. NII yields for the different size groups of foundations vary for selected years from 1974 to 1987 (Figure H).

The larger foundations tend to earn higher NII yields than the smaller foundations. The NII yields of the larger foundations exceeded those of the smaller ones for all of the years shown with the exception of 1982. The NII yield includes net (long-term) capital gains from the sale of assets. This relatively large source of income accounts for a greater proportion of the NII of the larger foundations than of the smaller foundations; and, therefore, helps to

explain part of the disparity in the NII yields between the small and large foundations. The increases in NII yields after 1982 may indicate that foundations, especially the medium- and large-sized groups, began to adjust their investment styles following the enactment of ERTA. Prior to ERTA, high income-producing investments, other than long-term capital gains, may have caused higher required distributable amounts.

A comparison of the NII yields with the rates of total return on assets shows that the NII yields tended to be less than the total rates of return for 1983 through 1986. The difference in the total returns and the NII yields indicates unrealized growth in assets between these years, since the NII yield does not account for the unrealized appreciation or depreciation of assets. However, for 1987, the year of the stock market decline and resultant low rates of total return, the NII yields, although they did drop from 1986, actually exceeded the total rates of return for that year. This shows the unrealized loss that occurred for 1987. The difference between the two measures may have occurred, in part, due to foundations that sold securities and realized large gains from January 1987 until the October stock market decline that led to decreased end-of-year asset values.

### ASSETS, DISTRIBUTIONS AND DECISION-MAKING

In the very favorable market environment during most of the mid-1980's, which was accompanied by low inflation and interest rates, foundations realized rates of total return that easily allowed them to both meet the payout requirement and increase the value of their endowments. Total nonoperating foundation assets and charitable distributions increased in real terms by 56 and 38 percent, respectively, over the 1982-1987 period. The amount of the real increases equaled \$31.7 billion in assets and \$1.7 billion in distributions. After the enactment of ERTA, from 1982 to 1986, nonoperating foundation assets grew considerably, by 58.1 percent. However, from 1986 to 1987

Figure G. — Nonoperating Foundation Rates of Total Return on Assets, 1983-1987

Size of fair market value of total assets	Median rates of return <sup>1</sup>			
	1983	1984-85 (2-year span)	1986	1987
	(1)	(2)	(3)	(4)
\$1 under \$1,000,000	n.a.	n.a.	n.a.	n.a.
\$1,000,000 under \$10,000,000	6.39%	25.30%	9.02%	1.29%
\$10,000,000 under \$25,000,000	9.21	31.17	11.21	-0.08
\$25,000,000 under \$50,000,000	9.47	34.27	11.39	2.33
\$50,000,000 under \$100,000,000	9.95	38.58	11.75	1.11
\$100,000,000 or more	11.69	29.56	13.94	1.36

n.a. - not available

<sup>1</sup>The GNP implicit price deflator was used to adjust for inflation.

Figure H. — Nonoperating Foundation Net Investment Income (NII) Yields, Selected Years, 1974-1987

Size of fair market value of total assets	Median net investment income yields <sup>1</sup>					
	1974 <sup>2</sup>	1982	1983	1985	1986	1987
	(1)	(2)	(3)	(4)	(5)	(6)
<b>Total</b> .....	<b>-3.37%</b>	<b>2.31%</b>	<b>4.47%</b>	<b>4.78%</b>	<b>4.74%</b>	<b>3.89%</b>
<b>Small foundations</b>						
<b>\$1 under \$1,000,000, total</b> .....	<b>-3.45</b>	<b>2.31</b>	<b>4.34</b>	<b>4.61</b>	<b>4.19</b>	<b>3.61</b>
\$1 under \$100,000 .....	-3.74	2.27	3.90	4.50	3.59	3.05
\$100,000 under \$1,000,000 .....	-3.05	2.43	4.38	4.95	5.07	4.06
<b>Medium foundations</b>						
<b>\$1,000,000 under \$50,000,000, total</b> .....	<b>-2.74</b>	<b>2.49</b>	<b>5.04</b>	<b>5.71</b>	<b>6.29</b>	<b>4.89</b>
\$1,000,000 under \$10,000,000 .....	-2.78	2.66	5.00	5.71	5.95	4.74
\$10,000,000 under \$50,000,000 .....	-2.27	1.52	5.48	6.00	8.25	5.99
<b>Large foundations</b>						
<b>\$50,000,000 or more, total</b> .....	<b>-2.46</b>	<b>1.67</b>	<b>5.53</b>	<b>6.84</b>	<b>7.70</b>	<b>5.63</b>
\$50,000,000 under \$100,000,000 .....	n.a.	2.54	5.63	7.01	8.37	5.65
\$100,000,000 or more .....	n.a.	0.58	5.06	6.56	7.08	5.53

n.a. - Not available

<sup>1</sup>The GNP implicit price deflator was used to adjust for inflation.<sup>2</sup>The calculation for 1974 divides net investment income by book value of investment assets. For all other years net investment income is divided by the fair market value of investment assets. The use of fair market values, unavailable for 1974, would have lowered the rates from those calculated and most likely affected the differences between the small and large foundations.

NOTE: Data were available only for the years 1974, 1982, 1983, 1985, 1986, and 1987. Data for both the \$50,000,000 under \$100,000,000 and the \$100,000,000 or more categories were not available for 1974.

assets declined by 1 percent. Likewise, distributions grew, with an uncharacteristic decline in the rate of growth only from 1986 to 1987. Relatively high foundation growth as compared to growth in the Gross National Product, the effects of the change in the payout requirement, and differences in the growth rates of different sizes of foundations, all may indicate that the 1981 Economic Recovery Tax Act has had an effect on the increased rate of growth of foundation assets and distributions.

As the size of a foundation increases, asset values tend to increase at faster rates. Since the larger foundations tend to earn relatively high rates of total return and pay out relatively low percentages of assets, the larger foundations increased their assets at a faster rate than did the smaller ones during the 1982-1987 period. The smallest group, during this period, is the only one that paid out qualifying distributions at a rate faster than the growth in their assets. This group, in fact, experienced larger percentage increases in charitable distributions for 1982-1987 than all of the other groups, with the exception of the largest. Due to their large increases in assets and an ability to better withstand market swings, since ERTA, the largest foundations not only have increased assets at the greatest rate, but also distributions. (For a description of changes in assets and distributions for operating foundations, see the Notes and References section [28].)

Foundations assume somewhat different roles and behave accordingly, depending upon their size. The disparity between 1987 and the earlier years may shed light

on the nature of the decision-making processes of nonoperating foundations. The question arises: does the rate of total return (and possibly the NII yield) in one year affect the payout rate of the next year? In other words, do certain foundations respond to low rates of return with low payout rates or to high returns with high payout rates? And, do these patterns differ with the size of the foundation?

It appears that the investment returns of smaller foundations may affect, at least in part, the amount of charitable dollars distributed in the following year. For instance, among other reasons, the smallest foundations may have responded to relatively low NII yields for 1982 by paying out distributions at lower rates in 1983 than in 1982. However, the smaller foundations also tend to rely, in large part, on the amount of contributions received in order to help fund their charitable grantmaking. For instance, decreases in the amount of contributions received for 1987 may have led to the slower rate of increase in charitable distributions for that same year. The smaller foundations tend to distribute proportionately large amounts in the present, based on contributions received, investment returns, and income yields.

Conversely, the goal of a more predetermined payout policy appears to drive the operations and investment policies of the larger foundations. They better manage their investments and distribute dollars in such a way as to promote long-run growth of the endowment. A growing endowment will fund charitable grants at the same or at

an increased value in the future. These foundations tend to distribute charitable dollars at relatively consistent payout rates irrespective of changing rates of return. For example, the larger foundations continued to pay out charitable dollars at a consistent rate in 1987 despite low rates of total return and declining assets in that year. These foundations tend to operate with a more planned and structured payout policy. A future examination of payout practices in 1988 after the unusually low investment returns of 1987 will provide more definitive insights into the investment and distribution goals and behavior of the different sizes of foundations.

## SUMMARY

Total private foundation revenue fell by 17.2 percent in 1986 dollars, or \$3.4 billion, from 1986 to 1987. Both contributions received and net gain (less loss) from sales of assets declined significantly in real terms, by 28.4 percent and 22.8 percent, respectively, when comparing 1986 to 1987. Interest and dividends, two significant components of total revenue, did increase, although by relatively small percentages. These losses for 1987 occurred after foundations realized large real increases between 1985 and 1986 in revenue, net gains from sales of assets, and contributions received, 18.9, 32.9, and 27.6 percent, respectively.

The poor market returns in 1987, following the October stock market decline, most likely affected the net gain (less loss) from sales of assets; net losses nearly tripled while net gains decreased by almost 20 percent. The stock market decline and the changes implemented under the 1986 Tax Reform Act may also have reduced contributions to foundations. The general decline in the market value of securities that occurred in the last quarter of 1987 reduced the value of the tax benefit of donating securities to foundations. And, the changes implemented under the 1986 Tax Reform Act, by lowering marginal tax rates, decreased the value of the tax deduction for charitable contributions. The decreases in these components of foundation revenue contributed to the real decline in the fair market value of total assets.

Along with decreases in revenue, the effect of the 1987 stock market decline largely contributed to the 2.1-percent real decline in end-of-year total foundation assets, or the drop from \$113.2 billion for 1986 to \$110.8 billion for 1987. Likewise, investments in securities declined by 2.7 percent in real terms, from \$87.0 billion to \$84.7 billion. The significant drop in the rates of total return between 1986 and 1987 confirms the effect of these losses. For nonoperating foundations with \$100 million or more in assets, the median rate of total return dropped

from 13.9 percent to 1.4 percent. Although the largest foundations realized the greatest rates of return and increases in assets since the Economic Recovery Tax Act of 1981, from 1986 to 1987 these foundations realized a decline in assets. The assets of the smallest foundations, however, actually increased from 1986 to 1987.

Despite the decreases in assets and investments, the amount of constant-dollar grants paid by all foundations increased by 5.8 percent from 1986 to 1987, although at a slower rate of increase than the prior year. Real qualifying charitable distributions (by nonoperating foundations) increased by 5.3 percent, as opposed to the 15.0-percent increase realized from 1985 to 1986. From 1986 to 1987, the largest foundations increased distributions at a rate over twice that of the 5.3-percent total rate, while the smallest foundations increased distributions at a rate 4 percentage points below the total. Also, the total payout rate did increase slightly, from 6.9 percent for 1986 to 7.0 percent for 1987. The payout rates help to explain the total decline in the value of foundation assets for 1987, as foundations tended to pay out charitable dollars at a rate greater than their rate of total return on assets. The results from 1986 to 1987 differ significantly from those between 1983-1986, when foundations realized high rates of total return and significant increases in assets, revenues, and distributions. In order to fund charitable distributions at an increased rate in both the present and the future, foundations rely heavily on the growth of their endowments.

## DATA SOURCES AND LIMITATIONS

The statistics in this article are based on samples of Tax Year 1986 and 1987 private foundation returns, Forms 990-PF, filed with the Internal Revenue Service (IRS). The 1987 Form 990-PF was required to be filed by organizations which had accounting periods beginning in that year (and therefore ending, in general, December 1987 through November 1988). A corresponding filing requirement applied to the 1986 Forms 990-PF. Some part-year returns were included in the samples for organizations that changed their accounting periods, or filed initial or final returns. Figure 1 shows the distribution of the 12 accounting periods covered by the 1987 statistics. Approximately 61 percent of the foundations' accounting periods cover either Calendar Year 1987 or any part-year periods ending December 1987. The remaining 11 non-calendar year accounting periods, when grouped together, spread over a period of time that ranges from February of 1987 to November of 1988 (and may also include some part-year periods). While the majority of the 1987 data are for Calendar Year 1987, 39 percent of the data were reported for noncalendar periods that go

beyond the end of Calendar Year 1987. In total, however, most of the financial activity is associated with 1987.

Returns filed by nonexempt charitable trusts and certain taxable foundations were excluded from the statistics for both 1986 and 1987. The two samples were stratified based on size of book value of total assets. The 1987 sample was selected at rates that ranged from 7.4 percent (for the more numerous but very small asset-size returns) to 100 percent (for the relatively few returns with large amounts of assets). Selection rates for the 1986 sample ranged from 5.0 percent to 100 percent. The 4,785 returns in the 1987 sample were drawn from an estimated population of 35,907. For 1986, a sample of 2,934 returns was drawn from an estimated population of 35,172.

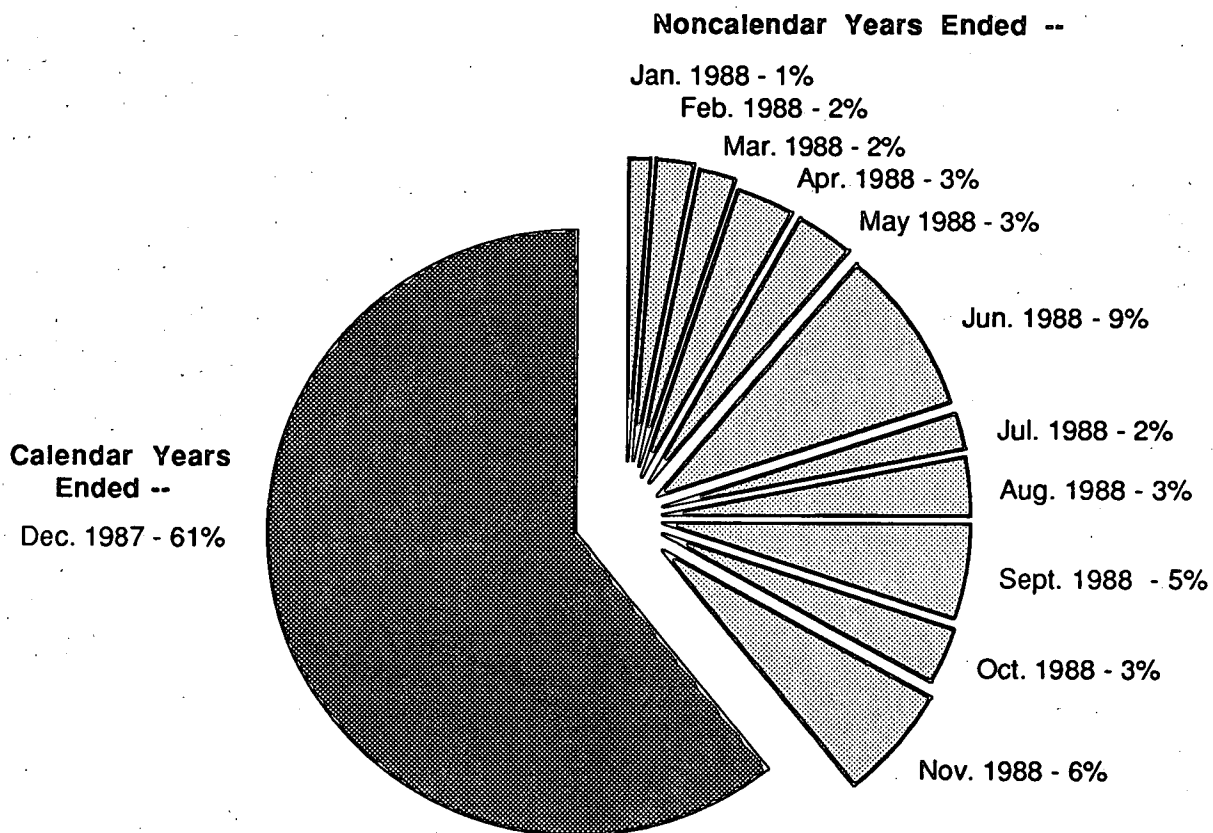
The 1986 and 1987 samples were designed to provide the most reliable estimates of total assets and total

revenue based on a small number of returns. The methodology employed was to include in the samples all returns with assets (book value) of \$10 million or more, since these were the returns that dollar-wise accounted for most foundation activity. For example, the 1,155 sample returns for 1987 in this group accounted for approximately 24 percent of all the returns in the sample and 77 percent of the book value of the estimated total assets of all foundations. The remaining 3,630 returns in the 1987 sample were randomly selected at various rates, depending on the asset size. A similar sample selection procedure was followed for 1986 returns.

The population from which the 1986 and 1987 samples were drawn consisted of private foundation records posted to the IRS Business Master File between 1987 and 1989. Some of the records designated were for organizations that were deemed inactive or terminated. Inactive

Figure I

Private Foundation Accounting Periods, 1987



NOTE: Calendar and noncalendar periods may include returns filed for only part of a year because of initial and final filings and changes of accounting period.

and terminated private foundations are not reflected in the estimates. For the small number of large private foundations for which a desired study-year return had not yet been filed or was otherwise unavailable for inclusion in the study, either prior-year returns were substituted or data were estimated using other returns having similar characteristics.

The data presented were obtained from returns as originally filed. In most cases, changes made to the original return as a result of an IRS examination or a taxpayer amendment were not incorporated into the data base. Because the data presented are estimates based on a sample, they are subject to sampling and nonsampling error. To use the statistical data properly, the magnitude of the sampling error should be known. Coefficients of variation (CV's) are used to measure that magnitude.

Figure J presents, for Tax Years 1986 and 1987, approximate coefficients of variation for frequency estimates of private foundation returns with less than \$10 million in assets. Returns with assets of \$10 million or more were selected at a prescribed rate of 100 percent; therefore, this category is not subject to sampling error. The approximate CV's shown here are intended only as a general indication of the reliability of the data. For a number other than those shown, the corresponding CV's can be estimated by interpolation.

**Figure J.—Coefficient of Variation for Frequency Estimates, Tax Years 1986 and 1987**

Estimated number of returns by size of book value of total assets			Approximate coefficient of variation
Under \$100,000 or not reported	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000	
(1)	(2)	(3)	(4)
<b>Return year 1986</b>			
15,400	12,400	5,000	.010
10,800	9,100	4,200	.025
5,200	4,700	2,600	.050
2,800	2,600	1,600	.075
1,700	1,600	1,000	.100
800	800	500	.150
300	300	200	.250
<b>Return year 1987</b>			
14,700	12,100	4,800	.010
9,200	7,400	2,700	.025
3,900	3,100	1,100	.050
2,000	1,600	500	.075
1,200	900	300	.100
600	400	100	.150
200	200	100	.250

NOTE: Because returns with total assets \$10 million or more were prescribed for selection at the 100-percent rate, coefficients of variation for them were not computed.

A discussion of the reliability of estimates based on samples and the use of coefficients of variation for evaluating the precision of sample estimates can be found in the general Appendix to this publication.

### EXPLANATION OF SELECTED TERMS

The following explanations describe terms as they applied to private foundations for 1986 and 1987.

*Adjusted Net Income.*--In general, this was the amount by which a private foundation's gross income exceeded the expenses associated with earning the income. Included were all amounts derived from, or connected with, property held by the foundation, such as net short-term capital gain (on sales of assets held 12 months or less), ordinary investment income (dividends and interest, rents and royalties), income from amounts set aside for future charitable use, income from all charitable functions, or unrelated trade or business activity income. Excluded were contributions received and long-term capital gains (or losses). This item was reported on Form 990-PF, Part I, line 27c, column (c).

*Assets Zero or Unreported.*--Included in this asset size category were: (1) final returns of liquidating or dissolving foundations which had disposed of all assets, and (2) returns of foundations not reporting end-of-year assets that had apparently distributed all assets and income received during the year.

*Disbursements for Charitable Purposes.*--These deductions represented grants paid and other expenditures for activities that were directly related to the tax-exempt purposes of the foundation. Included were necessary and reasonable administrative expenses paid for charitable, scientific, educational, or other similar purposes. These amounts were determined solely on the cash receipts and disbursements method of accounting, as required by law and regulations. This item was reported on Form 990-PF, Part I, line 26, column (d).

*Disqualified Persons.*--With respect to engaging in prohibited transactions, such as "self-dealing," with a private foundation, the following were considered disqualified persons: (1) all substantial contributors to the foundation (generally, those who contributed an amount over \$5,000 which was more than 2 percent of total contributions received by the foundation); (2) foundation officers, directors, trustees, or managers; (3) an owner of more than a 20 percent interest (voting power, profits interest, or beneficial interest) in an organization which was a substantial contributor to the foundation; (4) a member of the family of any individual described in (1),

(2), or (3), above (including spouse, ancestors, children, grandchildren, great-grandchildren, and spouses of children, grandchildren and great-grandchildren, but not brothers or sisters); (5) organizations in which persons described in (1) through (4), above, held more than a 35-percent interest; (6) another private foundation, for purposes of the tax on excess business holdings, which was effectively controlled by a person or persons in control of the foundation in question; and (7) a government official, for purposes of the tax on "self-dealing."

**Distributable Amount.**--This was the minimum payout amount which was required to be distributed by the end of the year following the year for which the return was filed in order to avoid the excise tax for failure to distribute income currently. The distributable amount was computed as 5 percent of net investment assets, called the "minimum investment return," minus taxes on net investment income and "unrelated business income," plus or minus other adjustments, either allowed or required. (See "Net Adjustments to Distributable Amount.") This item was reported on Form 990-PF, Part X, line 7.

**Excess Distributions Carryover.**--The excess amount distributed, after fulfilling the charitable payout requirement, that equaled the excess of qualifying distributions over the distributable amount. This amount could be carried forward to the following year from both the current year and the 4 prior years in order to be applied to the distributable amount in future years. This item was reported on Form 990-PF, Part XIV, line 9.

**Excess Grant Administrative Expenses.**--This was the amount of grantmaking administrative expenses incurred by a foundation, in the charitable grantmaking process, that exceeded the amount which could be applied to either the charitable payout requirement (imposed on nonoperating foundations) or the income test (imposed on operating foundations). The 1984 Deficit Reduction Act required that only the portion of grant administrative expenses incurred by a foundation that did not exceed 0.65 percent of a three-year average of noncharitable-use assets could be treated as qualifying distributions. Any grant administrative expenses in excess of the 0.65 percent calculation could not be treated as qualifying distributions. This temporary limitation on grantmaking expenses expired on December 31, 1990. Beginning with the 1991 tax year, foundations no longer will be subject to this requirement. This item was reported on Form 990-PF, Part XIII, line 5.

**Inventories.**--The value of materials, goods, and supplies purchased or manufactured by the organization and

held to be sold or used in some future period. This item was reported on Form 990-PF, Part II, line 8, columns (a) (beginning-of-year book value), (b) (end-of-year book value), and (c) (end-of-year fair market value).

**Land, Buildings, and Equipment, Charitable-use.**--The book value or fair market value (less accumulated depreciation) of all land, buildings and equipment not held for investment purposes. Included were any property, plant or equipment owned and used by the organization in conducting its charitable activities. This item was reported on Form 990-PF, Part II, line 14, columns (a) (beginning-of-year book value), (b) (end-of-year book value), and (c) (end-of-year fair market value).

**Land, Buildings, and Equipment, Investment-use.**--The book value or fair market value (less accumulated depreciation) of all land, buildings and equipment held for investment purposes, such as rental properties. This item was reported on Form 990-PF, Part II, line 11, columns (a) (beginning-of-year book value), (b) (end-of-year book value), and (c) (end-of-year fair market value).

**Minimum Investment Return.**--This was the aggregate fair market value of assets not used for charitable purposes, less both indebtedness incurred to acquire those assets and cash held for charitable activities, multiplied by 5 percent. The minimum investment return was used as the base for calculating the "distributable amount." This item was reported on Form 990-PF, Part IX, line 6.

**Net Adjustments to Distributable Amount.**--Adjustments that increased the "distributable amount" consisted of increases attributable to the income portion (as distinct from the principal portion) of distributions from split-interest trusts on amounts placed in trust after May 26, 1969. (A split-interest trust was a trust which was not exempt from tax; not all of whose interests were devoted to charitable, religious, educational, and like purposes; but which had amounts in trust for which a charitable contribution deduction was allowed.) Recoveries of amounts previously treated as qualifying distributions also had to be added back to the distributable amount.

Adjustments that decreased the distributable amount were the result of income required to be accumulated as part of an organization's governing instrument. These adjustments were allowed only to foundations organized before May 27, 1969, whose governing instrument continued to require the accumulation, since State Courts would not allow the organization to change its governing instrument. These items were reported on Form 990-PF, Part X, lines 4a, 4b, and 6.



**Net Gain (or Loss) from Sale of Assets.**--Included was profit or loss from sales of items such as securities, land, buildings, or equipment. Gain or loss reflected the amount shown on the books of the foundation and included any amount from the sale of property used for both investment and tax-exempt purposes. Most of the gain or loss was from sales of stocks and bonds. Profit or loss from the sale of inventory items was included in gross profit (loss) from business activities. This item was reported on Form 990-PF, Part I, line 6, column (a).

**Net Investment Income.**--This was the amount by which the sum of gross investment income plus capital gain net income exceeded allowable deductions. Included in investment income were interest, dividends, rents, payments with respect to securities loans, and royalties. Excluded were tax-exempt interest on governmental obligations and any investment income derived from unrelated trade or business activities, subject to the unrelated business income tax reported on Form 990-T. This item was reported on Form 990-PF, Part I, line 27b, column (b).

**Noncharitable-use Assets (Net Investment Assets).**--For purposes of calculating "minimum investment return," only the average, rather than end-of-year, fair market value of assets that were not used or held for use for tax-exempt purposes entered into the computation. An asset was not used directly in carrying out the foundation's exempt purpose if it was not used in carrying on a charitable, educational, or other similar function which gave rise to the exempt status of the foundation. Examples would be the fair market value of securities and rental property owned by the foundation for investment purposes. This item was reported on Form 990-PF, Part IX, line 5.

**Nonoperating Foundations.**--These were organizations that generally carried on their charitable activities in an indirect manner by making grants to other organizations that were directly engaged in charitable activities, in contrast to those (operating foundations) engaged in charitable activities themselves. However, some nonoperating foundations were actively involved in charitable programs, in addition to making grants. Nonoperating foundations were subject to an excise tax (and possible additional penalties) for failure to distribute an annual minimum amount for charitable purposes within a required time period.

**Operating Foundations.**--These foundations generally expended their income for direct, active involvement in a tax-exempt activity, such as operating a library or museum, or conducting scientific research. To qualify as

an operating foundation for a particular taxable year, a private foundation had to spend at least 85 percent of the lesser of its adjusted net income or minimum investment return on the direct, active conduct of exempt-purpose activities (the "income test") and satisfy one of three other tests termed the "assets test," the "endowment test," and the "support test." Operating foundations were excepted from the income distribution requirement, and its related excise taxes, applicable to nonoperating foundations.

Distributions made by a private nonoperating foundation to an operating foundation qualified toward meeting the nonoperating foundation's distribution requirement. (Distributions made by one nonoperating foundation to another were subject to a number of conditions and restrictions requiring a "pass-through" of the distribution, whereby the donor foundation received credit for a qualifying distribution but the donee foundation did not.) Additionally, contributions to operating foundations were deductible on individuals' income tax returns, limited to 50 percent of their adjusted gross income (as opposed to 30 percent for contributions to nonoperating foundations).

**Other Assets.**--Assets reported as "Other" included: (1) those assets not allocable to a specific asset item on the Form 990-PF balance sheet or not included elsewhere on the return, and (2) certain amounts given special treatment in the course of statistical processing. The first category included such items as: construction reserve land, deferred income, dividends receivable, escrow deposits, income tax refunds, interest discounts, interest-free loans, overdraft protection, and program-related investments. The second category included amounts reported by the return filer as negative liabilities. This item was reported on Form 990-PF, Part II, line 15, columns (a) (beginning-of-year book value), (b) (end-of-year book value), and (c) (end-of-year fair market value).

**Other Investments.**--Investments reported as "Other" included such items as: advances; bank certificates; cash values of life insurance; certificates of investment; investments in art, coins, gold, gems, and paintings; miscellaneous loan income; and patronage dividends. This item was reported on Form 990-PF, Part II, line 13, columns (a) (beginning-of-year book value), (b) (end-of-year book value), and (c) (end-of-year fair market value).

**Private Foundation.**--A nonprofit corporation, association, or trust with a narrow source of funds which operated or supported social, educational, scientific, charitable, religious, and other programs dedicated to improving the

general welfare of society. By law, a private foundation was an organization which qualified for tax-exempt status under Internal Revenue Code section 501(c)(3) and was not a church; school; hospital; medical research organization; an organization with broad public support in the form of contributions or income from tax-exempt activities; an organization which was operated by, or in connection with, any of the above described organizations; or an organization which tested for public safety. The primary difference between a private foundation and a public charity lay in the sources of each organization's funding. A foundation usually received its funds from an individual, a family, or a corporation, while, as the name implies, a public charity received its funds mainly from a large number of sources within the general public.

*Qualifying Distributions.*--Included were grants, direct expenditures to accomplish charitable purposes, charitable-purpose operating and administrative expenses, amounts paid to acquire assets used directly to accomplish tax-exempt functions, charitable program-related investments, and amounts set aside for future charitable projects. Qualifying distributions were creditable against the foundation's obligation to pay out its "distributable amount." This item was reported on Form 990-PF, Part XIII, line 6.

*Total Assets.*--This was the sum of all assets reported in the foundation's end-of-year balance sheet, shown at both book value and fair market value. This item was reported on Form 990-PF, Part II, line 16, columns (a) (beginning-of-year book value), (b) (end-of-year book value), and (c) (end-of-year fair market value).

*Total Expenses.*--This was the sum of contributions, gifts, and grants paid plus various operating and administrative expenses related to both investment and charitable-purpose activities. This item was reported on Form 990-PF, Part I, line 26, column (a).

*Total Revenue.*--This was the sum of gross contributions, gifts and grants received; interest and dividends from securities, savings, and temporary cash investments; net gain (less loss) from sales of assets (mostly investment assets, but could include charitable-use assets); gross rents and royalties; gross profit (or loss) from business activities; and other miscellaneous income. Total revenue items were reported as shown on the books and records of the foundation and were based on either the cash receipts or accrual method of accounting. This item was reported on Form 990-PF, Part I, line 12, column (a).

*Undistributed Income.*--The required amount remaining undistributed, after application of the charitable

payout requirement, that equaled the excess of the distributable amount over the sum of total qualifying distributions and any excess distributions carryover from prior years applied to the distributable amount. Sanctions were imposed in the form of penalty taxes on private foundations that did not pay out an amount equal to the distributable amount by the end of the following tax year. This item was reported on Form 990-PF, Part XIV, line 6f, column (d).

## NOTES AND REFERENCES

- [1] All references to assets are stated at their fair market value unless book value is specifically noted.
- [2] For 1987, the aggregate total revenue of private foundations consisted of interest and dividends from securities, savings, and temporary cash investments (32.6 percent), net gain (less loss) from sales of assets (32.5 percent), contributions, gifts and grants received (30.9 percent), and other miscellaneous types of income (4.0 percent). "Total revenue" and other terms, as they apply to private foundations, are described and cross-referenced in the "Explanation of Selected Terms" section.
- [3] For a description of the time periods covered by the 1986 and 1987 statistics, see the "Data Sources and Limitations" section of this article.
- [4] All inflation-adjusted "constant dollar" or "real" figures cited in this article were derived using the Implicit Price Deflators for Gross National Product contained in Council of Economic Advisors, *Economic Report of the President*, February 1990, Table C-3. Unless otherwise noted, figures referred to as "current dollars" or "nominal" are not adjusted for inflation.
- [5] For 1985 private foundation data, see Riley, Margaret, "Private Foundation Returns, 1985," *Statistics of Income Bulletin*, Summer 1989, pp. 27-43.
- [6] Over three-quarters of total expenses for 1987 were contributions paid out and the remainder, operating and administrative expenses.
- [7] The term "net gain (less loss)" refers to the aggregate total of all individual net gains reported minus all individual net losses reported.
- [8] For an in-depth discussion of organizations, other than private foundations, which are tax-exempt under Internal Revenue Code section 501(c)(3), see

Hilgert, Cecelia, and Mahler, Susan J., "Nonprofit Charitable Organizations, 1985," *Statistics of Income Bulletin*, Fall 1989, Volume 9, Number 2, pp. 53-65.

- [9] Programs termed "charitable" refer to any tax-exempt activities which are charitable, educational, scientific, social, literary, or religious in nature.
- [10] Generally, the assets test was met if 65 percent or more of the foundation's assets were used directly for the active conduct of charitable activities. The endowment test was met if the foundation normally made distributions for the active conduct of charitable activities in an amount not less than two-thirds of its minimum investment return. The support test was met if substantially all of its support (other than gross investment income) was normally received from the public or five or more qualifying exempt organizations; no more than 25 percent of its support (other than gross investment income) was normally received from any one such qualifying exempt organization; and no more than half of its support was normally received from gross investment income.
- [11] Some of the foundations classified as "nonoperating" for 1986 and 1987 were "failed public charities," organizations that were originally classified as public charities but that could no longer qualify for that favored status because they failed to maintain the required minimum of support from public sources. Most often, the reclassified nonoperating foundations continued to operate like public charities, conducting programs or providing direct services, as opposed to making grants to accomplish a charitable purpose. Perhaps many of these organizations could have qualified as operating foundations, but had not requested such status from the Internal Revenue Service.
- [12] For a discussion of how tax law changes made under the Tax Reform Act of 1986 affected individuals for 1987, see Hostetter, Susan and Bates, Jeffrey, "Individual Income Tax Returns, Preliminary Data, 1987," *Statistics of Income Bulletin*, Spring 1989, Volume 3, Number 4, pp. 5-26.
- [13] For example, a fully deductible \$100 donation made for 1986 by an individual whose income was taxed at a rate of 50 percent would actually cost only \$50 after the donation was claimed as a deduction from income on the individual's tax return (\$50 in tax was saved by reducing taxable income by \$100). The same \$100 donation made by the individual for 1987, with a newly reduced income tax rate of 38.5 percent, would actually cost \$61.50 (only \$38.50 in tax would be saved on \$100 deducted from taxable income).
- [14] *Statistics of Income--1986, Individual Income Tax Returns*, U.S. Department of the Treasury, Internal Revenue Service, 1989.
- [15] *Statistics of Income--1987, Individual Income Tax Returns*, U.S. Department of the Treasury, Internal Revenue Service, 1990.
- [16] *Statistics of Income--1986, Corporation Source Book*, U.S. Department of the Treasury, Internal Revenue Service, 1989.
- [17] *Statistics of Income--1987, Corporation Income Tax Returns*, U.S. Department of the Treasury, Internal Revenue Service, 1990.
- [18] The amounts of "contributions received" and "total revenue" used to calculate the ratios in Figure D were reported in Part I, lines 1 and 12, respectively, column (a) of the Form 990-PF. "Investment income" was reported in Part I, line 12, column (b) and is the gross amount, before deductions for related expenses. "Grants paid" was reported in Part I, line 25, column (d).
- [19] This represents the method used after the 1969 Act and up until 1982, when ERTA became effective.
- [20] Salamon, Lester M. and Voytek, Kenneth P., *Managing Foundation Assets: An Analysis of Foundation Investment and Payout Procedures and Performance*, The Council on Foundations, 1989.
- [21] *The Foundation Directory*, 11th edition, Loren Renz, editor, The Foundation Center, New York, 1987, p. xx.
- [22] To calculate the payout rate, the amount of (adjusted) qualifying distributions was divided by the amount of the monthly average of net investment (or noncharitable-use) assets. This payout formula adjusts qualifying distributions with slight additions and subtractions that are made to the required "distributable amount" on the Form 990-PF, Return of Private Foundation. The formula also adjusts for excess distributions made in the past and applied to the requirement of the current filing year.

[23] Data were available only for the years 1974, 1982, 1983, 1985, 1986, and 1987.

[24] The volatile stock market no doubt affected the asset value of a foundation differently depending on its accounting period. For instance, since the payout rate depends on a monthly average of assets, those foundations using a calendar year accounting period for 1987 realized 9 relatively solid months prior to the October decline. The payout rate calculation, then, would account for both the positive and negative months.

[25] The rate of total return formula is the same as that used by Salamon and Voytek in a study on foundation assets for the years 1979-1983. See: Salamon and Voytek, *Ibid.*, p. 32. The formula is as follows:

#### RATE OF TOTAL RETURN =

$$\begin{aligned} & ((\text{Ending Fair Market Value of Assets} \\ & \quad - \text{Beginning Fair Market Value of Assets}^*) \\ & \quad - (\text{Contributions Received by the Foundation}) \\ & \quad + (\text{Grants Paid by the Foundation} \\ & \quad + \text{Operating and Administrative Expenses} \\ & \quad + \text{Excise Tax Paid on Net Investment} \\ & \quad \quad \text{Income})) \\ & \quad \quad \quad \text{DIVIDED BY} \end{aligned}$$

$$\begin{aligned} & (\text{Beginning Fair Market Value of Assets} \\ & \quad + (\text{Contributions Received} / 2)) \end{aligned}$$

\*The beginning fair market value of assets for any given year equals the ending fair market value reported on the prior year's return. Thus, in order to provide a consistent form of measurement by which to compare rates of return among different years, the ending fair market value of assets amounts (reported for both the year subject to the computation and the prior year) were used to compute the total rate of return.

To calculate the rate of total return shown in Figure G, private foundation information returns in data samples for consecutive years were matched in order to analyze both the beginning- and end-of-year fair market value data. The returns in the samples were matched by the employer identification number (EIN). Due to the lower sampling rates for the smaller foundations, the rate of matching the information returns for consecutive years was not high enough to ensure a proper level of statistical confidence. Therefore, the rate of return was only calculated for the medium- and large-sized foundations, those holding \$1 million or more in assets. And, since 1984 returns were not sampled, calculating rates for 1984 and 1985 was not possible. However, by matching the 1983 and 1985 data files, median figures for the 2-year period were calculated.

[26] Salamon and Voytek, *Ibid.*

[27] Salamon and Voytek, *Ibid.*

[28] Operating foundations, although they realized smaller increases in assets and distributions than nonoperating foundations between 1982 and 1987, performed similarly during the same period. These organizations increased their real assets and distributions from 1982-1987 by 42 and 13 percent, respectively. Between 1986 and 1987, however, operating foundation assets declined 11 percent in 1986 dollars, a larger percentage than the 1-percent decline in total nonoperating foundation assets. And, unlike nonoperating foundations, operating foundations decreased their charitable distributions from 1986 to 1987, by 14 percent. Since operating foundations are not held accountable to a payout requirement, it is not surprising that their charitable distributions declined by a considerable amount for 1987. These foundations, then, did not increase assets by as much from 1982 to 1987, and did feel the effects of the 1987 decline more strongly.















**Table 2A.—All Private Foundations: Balance Sheets and Income Statements, by Size of Fair Market Value of Total Assets, 1986**

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets							
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 under \$25,000,000	\$25,000,000 under \$50,000,000	\$50,000,000 under \$100,000,000	\$100,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
<b>Number of returns</b> .....	<b>35,172</b>	<b>1,215</b>	<b>13,771</b>	<b>13,167</b>	<b>5,730</b>	<b>713</b>	<b>270</b>	<b>155</b>	<b>151</b>
<b>Total assets (book value)</b> .....	<b>87,191,337</b>	<b>*131</b>	<b>437,268</b>	<b>4,164,836</b>	<b>14,840,939</b>	<b>6,977,299</b>	<b>7,460,288</b>	<b>8,460,707</b>	<b>42,849,968</b>
Cash, total .....	11,813,575	*131	221,107	1,317,029	3,035,647	1,221,253	989,402	954,441	4,094,566
Non-interest bearing accounts .....	1,211,283	*131	54,531	290,444	426,424	120,477	82,176	78,529	158,571
Savings and temporary cash investments .....	10,602,293	-	188,578	1,028,585	2,609,222	1,100,777	887,228	875,911	3,935,995
Accounts receivable, net .....	608,181	-	5,545	19,897	78,397	39,291	27,141	28,537	411,373
Pledges receivable, net .....	81,228	-	*364	*1,238	*43,218	35,966	444	-	-
Grants receivable .....	64,475	-	*1,785	*19,624	*9,638	1,414	9,047	4,637	18,330
Receivables due from disqualified persons .....	18,807	-	-	*1,528	*16,387	165	183	12	535
Other notes and loans receivable .....	948,342	-	7,427	61,569	318,395	146,824	69,979	135,265	210,884
Inventories .....	55,150	-	*894	*2,955	*8,722	34,530	2,288	3,003	2,780
Prepaid expenses and deferred charges .....	36,088	-	*2,608	*898	2,806	11,739	1,712	8,977	7,351
Investments, total .....	69,404,049	-	178,084	2,493,534	10,354,978	6,908,674	6,038,358	6,888,083	36,544,342
Securities .....	64,184,892	-	180,341	2,041,805	9,407,579	6,303,287	5,507,692	6,395,801	34,368,387
Land, buildings, and equipment (less accumulated depreciation) .....	1,509,361	-	*327	87,358	112,488	525,200	184,195	122,633	875,844
Mortgage loans .....	543,193	-	*5,947	24,120	222,659	48,160	86,730	29,781	145,817
Other investments .....	3,186,603	-	11,469	340,252	812,250	430,707	278,742	337,889	1,154,295
Charitable-purpose land, buildings, and equipment (less accumulated depreciation) .....	2,297,235	-	11,887	165,182	525,003	328,459	196,298	265,479	805,148
Other assets .....	1,864,201	-	7,770	81,405	451,749	248,984	145,441	174,272	754,579
<b>Total liabilities</b> .....	<b>3,690,297</b>	<b>*15</b>	<b>26,961</b>	<b>174,752</b>	<b>502,524</b>	<b>365,152</b>	<b>355,073</b>	<b>292,508</b>	<b>1,973,312</b>
<b>Net worth</b> .....	<b>83,501,039</b>	<b>*116</b>	<b>410,307</b>	<b>3,990,084</b>	<b>14,338,414</b>	<b>6,612,147</b>	<b>7,105,215</b>	<b>8,168,200</b>	<b>40,876,556</b>
<b>Total revenue</b> .....	<b>20,031,228</b>	<b>60,308</b>	<b>376,791</b>	<b>1,482,104</b>	<b>4,040,566</b>	<b>2,213,381</b>	<b>1,831,520</b>	<b>1,812,129</b>	<b>8,214,429</b>
Contributions, gifts, and grants received .....	7,152,515	47,384	319,285	1,089,927	1,959,479	908,732	695,505	535,052	1,597,152
Interest on savings and temporary cash investments .....	973,627	1,680	12,973	77,484	231,148	134,581	94,448	108,959	312,354
Dividends and interest from securities .....	4,173,428	3,503	15,939	180,030	646,687	416,418	351,979	407,604	2,171,271
Gross rents .....	180,255	-	*1,544	14,083	34,940	11,504	34,182	31,123	52,919
Net gain (less loss) from sale of assets .....	6,894,128	*7,184	14,760	110,849	939,321	680,325	571,793	674,379	3,995,716
Gross profit from business activities .....	209,405	*407	7,410	2,871	142,001	10,200	16,599	15,568	14,352
Other income .....	347,868	*150	4,879	27,080	86,990	51,824	67,034	39,445	70,684
<b>Total expense</b> .....	<b>8,274,395</b>	<b>135,911</b>	<b>406,572</b>	<b>710,055</b>	<b>1,732,485</b>	<b>940,386</b>	<b>738,318</b>	<b>741,231</b>	<b>2,969,439</b>
Contributions, gifts, and grants paid .....	6,301,524	130,478	360,393	523,672	1,227,712	719,298	554,171	528,043	2,259,758
Compensation of officers .....	174,205	*188	6,983	14,158	49,998	18,042	17,688	16,837	49,329
Other salaries and wages .....	383,442	*901	6,286	49,928	103,641	40,457	34,986	37,494	109,771
Pension plans and employee benefits .....	91,189	*143	*583	*3,809	21,702	6,741	6,455	8,670	43,285
Legal fees .....	49,217	*333	5,842	13,058	5,185	3,829	7,421	3,829	12,672
Accounting fees .....	35,954	*214	1,997	6,273	12,529	4,731	3,157	3,032	4,021
Other professional fees .....	210,183	*37	2,024	7,270	40,010	20,599	19,490	23,955	96,789
Interest .....	57,407	-	233	5,100	18,492	9,451	9,383	9,457	5,291
Taxes .....	225,595	301	1,784	12,240	39,697	23,525	18,898	27,311	101,859
Depreciation and depletion .....	100,260	-	1,369	6,965	23,885	15,712	13,726	18,609	21,794
Occupancy .....	89,636	*44	2,412	8,842	22,720	15,327	9,494	7,705	33,092
Travel, conferences, and meetings .....	43,359	-	3,515	2,897	10,759	3,200	2,198	3,263	17,528
Printing and publications .....	20,950	*14	2,180	878	3,391	1,852	1,377	3,768	7,492
Other expenses .....	481,487	3,258	15,735	62,580	144,890	55,285	43,507	49,488	106,747
<b>Excess of revenue (less loss) over expense</b> .....	<b>11,756,831</b>	<b>-75,603</b>	<b>-29,782</b>	<b>772,049</b>	<b>2,308,081</b>	<b>1,272,995</b>	<b>1,063,202</b>	<b>1,070,896</b>	<b>5,344,991</b>
Excess of revenue, total .....	12,449,741	*240	122,537	876,005	2,448,441	1,328,699	1,157,320	1,097,683	5,420,615
Loss, total .....	692,910	75,843	152,319	103,956	140,361	53,704	84,118	26,985	75,625
<b>Total assets (fair market value)</b> .....	<b>113,175,909</b>	<b>-</b>	<b>451,268</b>	<b>4,657,968</b>	<b>17,889,696</b>	<b>11,221,270</b>	<b>9,289,741</b>	<b>10,822,037</b>	<b>59,843,840</b>
Cash, total .....	11,837,309	-	221,282	1,317,624	3,038,533	1,230,692	972,811	954,933	4,102,035
Non-interest bearing accounts .....	1,216,403	-	57,347	290,703	427,409	120,625	82,175	78,599	159,548
Savings and temporary cash investments .....	10,620,908	-	183,935	1,026,921	2,611,124	1,109,487	890,636	878,334	3,842,489
Accounts receivable, net .....	605,970	-	5,545	19,427	75,960	37,845	27,141	28,537	411,515
Pledges receivable, net .....	81,224	-	*364	*1,238	*43,214	35,966	444	-	-
Grants receivable .....	64,894	-	*1,785	*19,624	*9,638	1,414	9,047	4,600	18,330
Receivables due from disqualified persons .....	18,807	-	-	*1,528	*16,387	165	183	12	535
Other notes and loans receivable .....	984,785	-	7,427	61,700	312,033	148,782	63,998	135,441	259,035
Inventories .....	53,777	-	*850	*2,955	*8,778	32,483	2,288	3,163	3,585
Prepaid expenses and deferred charges .....	73,314	-	*2,818	*898	2,806	11,739	1,706	8,968	44,381
Investments, total .....	93,798,841	-	189,058	2,928,292	13,180,597	8,903,817	7,781,321	9,169,806	51,648,150
Securities .....	87,014,581	-	189,817	2,480,138	12,007,407	8,161,108	7,082,033	8,392,341	48,711,720
Land, buildings, and equipment (less accumulated depreciation) .....	2,272,023	-	*503	107,451	220,887	163,754	323,528	321,085	1,134,818
Mortgage loans .....	560,697	-	*5,965	24,121	240,497	48,493	86,197	29,907	145,817
Other investments .....	3,951,559	-	12,773	306,582	711,807	530,484	309,562	426,574	1,653,798
Charitable-purpose land, buildings, and equipment (less accumulated depreciation) .....	2,882,673	-	12,452	201,404	665,616	359,919	248,884	290,175	1,104,222
Other assets .....	2,771,324	-	8,888	99,946	536,228	459,088	182,522	226,602	1,257,053
<b>Total assets, beginning of year (book value)</b> .....	<b>73,433,763</b>	<b>161,762</b>	<b>467,480</b>	<b>3,363,216</b>	<b>12,266,450</b>	<b>7,675,266</b>	<b>6,201,612</b>	<b>7,273,884</b>	<b>36,022,094</b>
<b>Investments in securities, beginning of year (book value)</b> .....	<b>54,532,656</b>	<b>*89,248</b>	<b>219,337</b>	<b>1,578,562</b>	<b>7,831,212</b>	<b>5,397,466</b>	<b>4,593,416</b>	<b>5,465,601</b>	<b>29,357,614</b>

\*Estimate should be used with caution because of the small number of returns on which it is based.

NOTE: Detail may not add to total due to rounding.

Table 2B.—All Private Foundations: Balance Sheets and Income Statements, by Size of Fair Market Value of Total Assets, 1987

[All figures are estimates based on a sample—money amounts are in thousands of dollars]

Item	Total	Size of fair market value of total assets							
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 under \$25,000,000	\$25,000,000 under \$50,000,000	\$50,000,000 under \$100,000,000	\$100,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
<b>Number of returns</b> .....	<b>35,907</b>	<b>858</b>	<b>14,190</b>	<b>13,671</b>	<b>5,882</b>	<b>712</b>	<b>284</b>	<b>157</b>	<b>154</b>
<b>Total assets (book value)</b> .....	<b>93,783,400</b>	<b>7,446</b>	<b>456,021</b>	<b>4,627,421</b>	<b>15,649,389</b>	<b>6,608,393</b>	<b>8,269,747</b>	<b>9,063,128</b>	<b>46,081,854</b>
Cash, total .....	12,095,264	2,734	219,483	1,357,893	2,972,452	1,222,067	1,133,984	956,905	4,229,637
Non-interest bearing accounts .....	1,088,319	2,699	81,079	288,047	1,048,146	341,381	140,146	80,648	85,373
Savings and temporary cash investments .....	11,008,948	*35	158,404	1,071,947	2,631,071	1,081,922	1,053,346	867,858	4,144,264
Accounts receivable, net .....	383,144	*222	3,928	28,875	65,599	40,807	29,247	23,210	181,258
Pledges receivable, net .....	124,677	-	*283	*3,429	35,174	53,106	16,343	-	16,342
Grants receivable .....	69,242	-	*552	*21,698	*16,848	9,718	4,044	2	16,378
Receivables due from disqualified persons .....	37,554	-	*314	*6,627	29,735	-	111	282	485
Other notes and loans receivable .....	818,481	*10	5,605	92,424	203,038	119,255	92,368	104,494	201,287
Inventories .....	45,356	-	*2,171	*8,591	2,114	2,685	25,807	3,339	2,650
Prepaid expenses and deferred charges .....	158,384	-	1,540	6,818	16,648	4,398	2,478	15,011	11,491
Investments, total .....	75,894,008	*148	192,531	2,891,139	11,326,473	7,578,175	6,535,968	7,500,090	39,869,685
Securities .....	69,948,993	*148	173,633	2,508,487	10,189,634	6,803,444	6,059,587	7,002,397	37,209,692
Land, buildings, and equipment (less accumulated depreciation) .....	1,645,105	-	2,960	73,161	199,313	152,518	173,621	122,170	921,362
Mortgage loans .....	478,745	-	*3,445	32,481	181,105	56,983	28,282	44,013	130,436
Other investments .....	3,825,163	-	12,492	277,010	756,421	565,229	274,506	331,510	1,607,994
Charitable-purpose land, buildings, and equipment (less accumulated depreciation) .....	1,775,761	*4,324	9,918	132,616	516,970	292,293	198,097	314,789	306,754
Other assets .....	2,481,526	*9	19,697	79,208	484,337	285,889	231,294	165,006	1,236,086
<b>Total liabilities</b> .....	<b>3,367,202</b>	<b>*9,356</b>	<b>32,621</b>	<b>153,164</b>	<b>479,097</b>	<b>398,440</b>	<b>416,479</b>	<b>225,592</b>	<b>1,652,454</b>
<b>Net worth</b> .....	<b>90,416,197</b>	<b>-1,909</b>	<b>423,400</b>	<b>4,474,257</b>	<b>15,170,292</b>	<b>6,209,953</b>	<b>7,853,268</b>	<b>8,837,536</b>	<b>44,429,400</b>
<b>Total revenue</b> .....	<b>17,116,794</b>	<b>16,506</b>	<b>292,969</b>	<b>1,254,630</b>	<b>3,369,230</b>	<b>1,911,881</b>	<b>1,896,361</b>	<b>1,624,120</b>	<b>6,951,097</b>
Contributions, gifts, and grants received .....	5,285,234	14,322	247,081	818,208	1,501,066	787,793	582,475	531,563	802,725
Interest on savings and temporary cash investments .....	1,062,734	1,030	12,506	91,913	253,525	126,184	116,065	107,349	354,182
Dividends and interest from securities .....	4,513,899	*715	13,738	187,787	700,058	453,867	374,550	439,552	2,343,632
Gross rents .....	202,374	-	2,406	10,906	48,388	9,979	26,267	36,087	66,342
Net gain (less loss) from sale of assets .....	5,567,476	*414	2,781	128,677	717,981	474,856	527,881	448,205	3,266,700
Gross profit from business activities .....	118,184	-	5,202	2,708	56,061	8,812	3,850	24,492	17,041
Other income .....	386,908	*25	9,273	14,431	92,150	50,408	63,272	36,872	100,476
<b>Total expenses</b> .....	<b>9,072,066</b>	<b>46,362</b>	<b>285,254</b>	<b>830,777</b>	<b>2,010,489</b>	<b>1,018,447</b>	<b>845,623</b>	<b>759,035</b>	<b>3,275,890</b>
Contributions, gifts, and grants paid .....	7,060,741	42,020	228,314	683,575	1,548,349	775,481	546,567	462,221	2,622,811
Compensation of officers .....	185,130	*247	4,137	18,939	48,727	23,508	20,380	17,643	53,549
Other salaries and wages .....	349,295	*190	9,561	28,722	82,385	39,063	42,455	41,302	105,817
Pension plans and employee benefits .....	79,003	-	873	2,578	12,001	7,130	8,182	9,850	38,591
Legal fees .....	50,303	892	1,756	6,220	13,808	5,281	3,732	5,454	13,181
Accounting fees .....	49,382	224	2,533	9,637	15,359	6,704	4,607	4,036	6,283
Other professional fees .....	224,706	*155	2,679	8,815	36,430	22,555	21,839	25,969	106,263
Interest .....	59,011	-	288	3,120	20,748	13,762	11,680	4,830	4,584
Taxes .....	296,125	97	1,885	15,733	57,537	35,498	28,186	34,793	122,416
Depreciation and depletion .....	95,840	-	1,003	5,107	23,085	15,336	15,940	13,831	21,537
Occupancy .....	93,663	*146	2,075	6,988	18,592	9,460	10,751	8,992	36,658
Travel, conferences, and meetings .....	45,013	*311	3,733	2,853	7,442	3,553	2,955	4,442	19,923
Printing and publications .....	22,702	39	2,239	1,348	2,618	2,213	1,470	4,583	8,212
Other expenses .....	481,143	2,038	24,195	39,340	123,407	58,902	59,822	36,964	116,474
<b>Excess of revenue (less loss) over expenses</b> .....	<b>8,044,727</b>	<b>-29,857</b>	<b>7,716</b>	<b>423,853</b>	<b>1,356,741</b>	<b>893,434</b>	<b>850,536</b>	<b>865,066</b>	<b>3,675,217</b>
Excess of revenue, total .....	9,180,495	*498	62,793	629,413	1,724,554	1,018,462	963,773	952,091	3,827,911
Loss, total .....	1,135,768	30,355	5,078	205,560	368,813	126,028	113,235	87,005	152,694
<b>Total assets (fair market value)</b> .....	<b>114,301,195</b>	-	<b>459,435</b>	<b>5,038,021</b>	<b>17,902,316</b>	<b>11,127,180</b>	<b>9,841,854</b>	<b>10,017,271</b>	<b>59,115,117</b>
Cash, total .....	12,078,930	-	219,307	1,355,119	2,970,050	1,213,596	1,128,473	957,808	4,232,579
Non-interest bearing accounts .....	1,077,628	-	81,064	283,226	341,998	134,710	80,298	86,757	87,576
Savings and temporary cash investments .....	10,999,302	-	158,243	1,071,893	2,628,052	1,078,898	1,048,175	869,049	4,145,004
Accounts receivable, net .....	395,547	-	3,893	29,996	67,898	43,075	35,567	22,974	192,354
Pledges receivable, net .....	124,611	-	*283	*3,429	35,070	53,106	16,381	-	16,342
Grants receivable .....	70,039	-	*1,264	*21,783	*16,848	9,718	4,044	2	16,378
Receivables due from disqualified persons .....	46,010	-	*314	*6,904	38,513	-	111	282	485
Other notes and loans receivable .....	851,740	-	5,605	91,541	195,154	120,702	86,467	105,164	247,107
Inventories .....	50,950	-	*1,967	*9,118	2,724	2,823	25,807	5,117	3,394
Prepaid expenses and deferred charges .....	103,169	-	1,417	6,755	16,123	4,359	2,472	15,010	47,034
Investments, total .....	94,810,924	-	199,824	3,259,451	13,299,145	8,892,602	7,935,196	8,189,086	52,035,820
Securities .....	87,351,765	-	180,449	2,853,382	11,933,881	7,900,036	7,304,635	8,474,289	46,705,091
Land, buildings, and equipment (less accumulated depreciation) .....	2,468,881	-	3,490	105,240	338,562	212,563	309,700	298,247	1,199,078
Mortgage loans .....	482,091	-	*3,445	32,112	186,181	56,996	28,304	44,054	131,009
Other investments .....	4,510,186	-	12,439	268,718	840,522	723,014	292,557	372,496	2,000,441
Charitable-purpose land, buildings, and equipment (less accumulated depreciation) .....	2,309,957	-	11,840	154,841	720,185	426,695	252,642	308,295	435,460
Other assets .....	3,452,086	-	13,204	96,091	525,694	360,504	354,695	213,535	1,888,363
<b>Total beginning of year assets (book value)</b> .....	<b>86,019,399</b>	<b>33,660</b>	<b>451,536</b>	<b>4,166,481</b>	<b>14,167,916</b>	<b>8,676,455</b>	<b>7,415,644</b>	<b>8,211,953</b>	<b>42,895,752</b>
<b>Investments in securities, beginning of year (book value)</b> .....	<b>63,514,189</b>	<b>10,938</b>	<b>165,550</b>	<b>2,208,040</b>	<b>9,022,169</b>	<b>6,046,596</b>	<b>5,384,627</b>	<b>6,307,046</b>	<b>34,369,223</b>

\*Estimate should be used with caution because of the small number of returns on which it is based.

NOTE: Detail may not add to total due to rounding.