

September 14, 2007

Via Email: Form990Revision@irs.gov
Form 990 Redesign
Attn: SE:T:EO
1111 Constitution Ave., N.W.
Washington, DC 20224

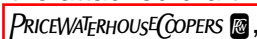
I. Introduction

Enclosed please find comments on the proposed redesigned Form 990 by PricewaterhouseCoopers LLP ("PwC"). PwC is a large public accounting firm that provides services to many types of tax-exempt organizations. As part of our practice, PwC annually prepares and reviews, on behalf of clients, many Forms 990. We welcome the opportunity to comment upon the draft redesigned Form 990 released by the Internal Revenue Service (the "Service" or "IRS") on June 14, 2007.

The IRS announcement releasing the draft return noted that the IRS "needs a Form 990 that reflects the way this growing [tax-exempt] sector operates in the 21st century. The new 990 aims to give both the IRS and the public an improved window into the way tax-exempt organizations go about their vital mission." The announcement further noted the redesign of the Form 990 is based on the guiding principles of enhancing transparency, promoting compliance, and minimizing the burden on filing organizations.

We encourage the IRS to pursue those goals and hope that our comments and observations in the paragraphs below will be helpful in that regard. It should be understood that the comments and suggestions made in this communication are offered on the basis of our experience and our judgement as practitioners about needs for sound and effective tax administration and policy. Our comments and suggestions may not necessarily reflect the views of individual clients.

II. Format and Style of PwC Presentation and Comments

PwC is presenting its comments, in part, through the use of annotations and interactive links throughout the redesigned Form 990 and Schedules. We have indicated our comments in brief directly on the attached draft Form. In the electronic version, we invite the reader to click on the PwC logo, , wherever it appears in order to read more. The references to the comment page number accompanying these annotations are equally useful for those who prefer to work with a hard copy only. Should the reader choose to view our comments via hard copy, we recommend the use of a color printer.

Contents

(Click on topic for link to comment).

<u>Topic</u>	<u>Page</u>
<u>I. Introduction</u>	1
<u>II. Format and Style of PwC Presentation and Comments</u>	1
<u>III. PwC Perspective on the Importance of Form 990</u>	3
<u>IV. Overall Comments</u>	4
<u>V. Comments on Specific Items</u>	
<u>Part I, Summary</u>	6
<u>Part II, Compensation</u>	7
<u>Part III, Governance</u>	8
<u>Part IV, Statement of Revenue</u>	9
<u>Part V, Statement of Functional Expenses</u>	10
<u>Part VI, Balance Sheet</u>	11
<u>Part VII, Statement Regarding General Activities</u>	11
<u>Part VIII, Statement Regarding Other IRS Filings</u>	12
<u>Part IX, Statement of Program Service Accomplishments</u>	12
<u>Schedule A, Public Support Analysis</u>	13
<u>Schedule B, Schedule of Contributors</u>	13
<u>Schedule C, Political Campaigns and Lobbying Activities</u>	13
<u>Schedule D, Supplemental Financial Statement Detail</u>	13
<u>Schedule E, Private Schools</u>	14
<u>Schedule F, Statement of Activities Outside the U.S.</u>	14
<u>Schedule G, Supplemental Information Regarding Fundraising Activities</u>	16
<u>Schedule H, Hospitals</u>	16
<u>Schedule I, Supplemental Information on U.S. Grants</u>	17
<u>Schedule J, Supplemental Compensation Information</u>	18
<u>Schedule K, Tax Exempt Bonds</u>	18
<u>Schedule L, Loans</u>	19
<u>Schedule M, Non-Cash Contributions</u>	20
<u>Schedule N, Liquidation, Termination, Dissolution, or Significant Disposition of Assets</u>	20
<u>Schedule R, Related Organizations</u>	21
<u>VI. Conclusion</u>	21
<u>VII. Appendix, Annotated Proposed Redesigned Form 990 and Schedules</u>	22

III. PwC Perspective on the Importance of Form 990

We believe the Form 990 is the key and central instrument in our tax system for effectuating and measuring public accountability for the benefits and subsidies of tax exemption, including the deductibility of charitable contributions and the availability of tax-free bonds that charities or other nonprofit organizations may enjoy. Being prescribed by the Internal Revenue Code, Form 990 is also the chief tool that is available to the IRS and other regulatory authorities to determine adherence with the relevant tax law rules. As a matter of necessity, the first priority of the Form 990 has been, and we would expect will continue to be, the reporting of financial and other information about the activities of tax-exempt entities in a manner that is responsive to the enforcement needs of the IRS and other regulatory bodies and to legitimate information needs of the general public.

From our perspective, the enforcement needs include, among other things:

- Reporting about financial matters
- Furnishing descriptive information about the conduct of core activities
- Providing other information on tax matters, including but not limited to
 - Satisfaction of continuing conditions for tax-exempt status
 - Ongoing qualification for classification as a public charity, where appropriate
 - Participation in direct or indirect transactions with "insiders" and disqualified persons, including compensation arrangements
 - The occurrence of certain acts, transactions, or expenditures relating to possible imposition of excise taxes under chapter 42 of the Code
 - The reporting of potential liability for filing an unrelated business income tax return on Form 990-T.

At the same time, a well-designed Form 990 should not impose an excessive burden on the filing organization. The design and layout of the Form should guide a filer in a clear, logical, and orderly way toward completion. The Form should be responsive in a balanced and minimally intrusive way to meet the needs of the IRS, other regulators, and the public. In addition, the burden on filing organizations to complete the Form 990 and maintain the underlying records also should take into account the size and nature of activities of the filing organization.

The IRS's guiding principles that support the Form 990 redesign -- enhancing transparency to provide the IRS and the public with a realistic picture of the organization; promoting compliance by accurately reflecting the organization's operations, so that the IRS may efficiently assess the risk of non-compliance; and minimizing compliance burdens -- are fully consistent with our view and perspective as tax return preparers and tax practitioners. It is from this standpoint that we offer our comments and suggestions in the pages that follow.

In general, we believe that the approach of utilizing a core form with attached schedules that address specific filing requirements could be a useful approach. However, as you will see in the following discussion, many sections and schedules as presented in this draft Form 990, in fact, may increase compliance burdens and promote inconsistent reporting for comparative purposes or transparency.

IV. Overall Comments

From an overall perspective, and in response to the request for comments, we offer these points:

1. The Filing Threshold Should be Increased

In the interest of minimizing the compliance burden on small organizations, we believe the IRS should consider raising the current \$25,000 annual gross receipts threshold to \$50,000, thereby allowing more relatively small organizations to File Form 990-N in lieu of Form 990 or Form 990-EZ. To ensure the maximum benefit of such relief to these small organizations, the IRS should seek to coordinate any changes in the filing threshold with state regulators and try to adopt a uniform approach.

2. The Increased Compliance Burden Should Be Eased with a Transition Period.

As we have discussed below, in the interest of minimizing compliance burdens, we request the IRS consider the need for transition periods in order to implement new recordkeeping and reporting requirements, such as, for example, among others, new Schedule H, Hospitals, and Schedule K, Supplemental Information on Tax Exempt Bonds.

3. Group Returns May Ease Filing Burdens. Should be Studied More Carefully in Light of the Redesigned Form, and Should Be Continued for Present

The IRS has requested that the public submit comments on whether the availability of group returns should continue in the interest of minimizing compliance burdens. We believe that group returns may serve to minimize compliance burdens. However, we would like to reserve the opportunity to comment on this point until such time that is clear that this redesigned Form 990 fulfils the important objectives of transparency and clarity in reporting on a single-entity basis. Unless transparency and clarity are achieved for single-entity filers, group returns would not serve useful objectives.

4. The Use of Space on Each Page Should Be Better Designed

Throughout the proposed redesign of Form 990, space should be used more effectively. For example, the header section of page 1 of Form 990 should be more efficient in its use of space. There is much empty space for item E, telephone number; item H, gross receipts; and item L, year of formation. By contrast, there is insufficient space for item F, name and address for the principal officer.

In addition, the field in the heading for item M, state of legal domicile, should be expanded to accommodate filings by foreign organizations.

On page 1 of the Summary, lines 25 and 26 relating to gaming and fundraising expenses are allocated significant high visibility space. However, more than 75% of filers are estimated to leave this section of the Form 990 blank. We, therefore, recommend the removal of these lines from the Summary page.

Finally and obviously, page 4 of the draft form is about one-half blank.

5. The Exemption Letter Date and the Type of Legal Entity Should Be Prominently Displayed

The IRS exemption letter is important to a filing organization because it represents the IRS recognition of its tax exemption under the Internal Revenue Code. Additionally, this letter is the basis upon which an organization continually will monitor its operations to ensure compliance with its exempt status and also convey updated information to the IRS about changes in activities or governing instruments. The Form as currently drafted does not call for the date of the IRS exemption letter. We recommend that Box L on the draft Form 990 include the date of formation and date of the determination letter. These items would remind the organization of the importance of notifying the IRS about changes.

Further, we suggest that the heading ask for the legal status of the filer (e.g. domestic corporation, unincorporated association, trust, etc.)

6. The Flow of Information Requested Should Be Improved

To increase transparency and minimize compliance burdens, the IRS should gather the questions that trigger additional schedules in one section of the core form. Although certain questions seem better placed in different relevant parts of the core form, this added efficiency might warrant the grouping suggested later in our discussion.

7. The Paperwork Burden Should Be More Carefully Considered and Limited

Lois Lerner, Director of the Exempt Organizations Division, has stated her expectation that there will be no change in burden as a result of the redesign unless an organization has "complicated compensation arrangements, related entity structures and activities that raise compliance concerns." However, and recognizing that this may be the IRS' intent, it is our view, based on experience, that the vast majority of filing organizations would experience a noticeably increased record-keeping burden in order to comply with the expanded reporting requirements of the redesigned form. Chief examples of where an organization will be required to implement new reporting methodologies or systems in order to gather and maintain required new information, and where we believe a potentially significant burden could be encountered, include: Schedule F, Statement of Activities Outside of the U.S.; Schedule H, Hospitals; Schedule K, Supplemental Information on Tax Exempt Bonds; and Schedule L, Supplemental Information on Loans.

8. Suggested Format and Design Points--Summary Page

As explained in more detail below, we recommend that: (1) The Summary page should only include information that is pertinent to all, or almost all, filers, (2) a list of all Schedules to the Form 990 should be listed and each filer should be required to check the boxes for those Schedules that are attached as part of the filing

organization's return, and (3) any information not required to be completed by all organizations be moved from the Summary to a separate schedule or otherwise be arranged to avoid reader confusion.

V. Comments on Specific Items

Part I, Summary

As currently drafted, and for reasons set forth above in our overall comments, we question the usefulness of the Summary. We believe the Summary, as drafted, fails to meet the IRS's objective of providing a snapshot of key financial measures for all filing organizations.

First, the requirement set forth on page 15 of the draft instructions states that all organizations other than section 501(c)(3) and (c)(4) and section 4947 nonexempt charitable trusts must complete only lines 1-16 and lines 20-26. This approach is clear in the instructions, but would be obfuscated to the ordinary reader of the draft Form 990. As a result, the reader could reasonably conclude that a 501(c)(6) organization, for example, has omitted required information, while, in fact, this organization has followed the applicable instructions.

Second, many of the metrics sought in Part I are subject to inconsistent reporting across organizations and misleading interpretation by readers, including the IRS. For example, line 7, which asks for the highest salary paid, does not offer insight into whether that salary is reasonable, but only acts as an isolated statement which may or may not have relevant implications. We do not see any overall tax administration purpose to be gained by focusing in on this out-of-context single piece of information. It is elsewhere readily available and should be dropped here.

The disclosure sought on page 1, line 7 relating to the highest compensation amount for officer, director, and key employee etc. salaries as a percentage of program expense is supposedly intended to allow a reader to compare this percentage to other filers. However, comparability generally is established by comparing compensation paid for like services in like circumstances. Isolated metrics such as those requested in this Summary fall short; that is, they do not allow for expansion of information commonly used for comparison. For example, they do not take into account geography, whether compensation is deferred, the size of the organization's assets, or other factors that would pose complexity justifying various levels of compensation. Accordingly, such a metric easily could create a false impression of the appropriate use of an organization's resources.

In this vein, we suggest all metrics be eliminated from the Summary and the Form 990. As already noted, the proposed Summary page duplicates information that would be contained in other schedules and parts of the Form. If the IRS or members of the public desire a summary of information, in this electronic age, that information could be gathered from the relevant sections of the return.

On the other hand, we believe that information relating to 1) the date of exemption letter (as discussed above), 2) a mission statement, and 3) Form 990-T filing could and should be included on page 1 in a Summary section or, perhaps, in the heading.

Part II, Compensation

The instructions require that compensation on Part II must be compiled from Forms W-2 and 1099. This requirement helps promote a useful and uniform standard for reporting, provides reliable information, and is relatively easy to meet. We believe this requirement makes much sense and has the potential to reduce both taxpayer error and filing burdens. Accordingly, it should remain.

With regard to Part II, Section A relating to officer compensation, the IRS should prescribe an ordering rule for reporting. There are only 18 lines for entries in this section. As drafted, this section could present an opportunity for inappropriate manipulation of data regarding the reporting of individuals on the first or any subsequent pages for this section. Accordingly, to promote uniformity, we recommend that persons receiving compensation be disclosed first, according to positions (e.g., officer, director, etc.), and then in alphabetical order. Thereafter, unpaid persons (e.g., volunteer officers, directors, etc.) should be listed, similarly, by position, and then alphabetically. An IRS-prescribed ordering system is essential to help promote fair and uniform reporting to prevent circumventing the intended purpose of this schedule.

At the same time, we are concerned that based on our past experience with software packages used for tax preparation, there have been limitations on the flexibility of allowing for "rollover" of information from prior years. We, therefore, suggest that the IRS work with the software vendors to ensure that the technology is sufficiently flexible to allow add-ons for current information to be "rolled over" from prior years without the added burden of additional input each year. For example, if the system could allow automatic alphabetizing of the persons included in prior years with updated information for persons reported in current years, this would help decrease the burden of compliance. Accordingly, we suggest that the IRS should require software vendors to adapt subsequent year changes in an integrated and not "add-on" fashion.

Under the definition of "employee, key," the Glossary should provide examples to assist organizations in understanding who could be a key employee in an organization.

Regarding the reporting of each individual's city and state on this schedule, at this time, we believe that privacy and security concerns are paramount and should be taken into account to eliminate this requirement.

Part II, Line 10a, requests a listing of the top five independent contractors receiving more than \$100,000. We question why the IRS has more than cut in half reporting on independent contractors. The current Form requires listing the top 10 independent contractors paid over \$50,000. We believe this matter is primarily a transparency and fairness issue.

Many organizations already have complied with the additional reporting in this regard in recent prior year filings. In fact, they have exercised reasonable efforts and instituted confirmations in regard to relationships between these persons for purposes of the new Line 75 in the 2006 Forms 990. The current 2006 Form 990 is responsive to transparency and accountability in this regard. This redesigned draft form seems to detract from this consideration without explanation. We suggest, therefore, that the IRS continue the present reporting format.

On Part II, Section B, Line 5 relates to relationships among officers, directors, trustees, and key employees. We believe the IRS should reconsider the time period posed to query former officers on their relationship with the filing organization unless they are disqualified persons with respect to the filing organization. Currently, the time period of five years seems overly long and particularly burdensome. This time period would require organizations to seek out and maintain officers, etc. who have long severed the relationship with the organization. We recommend a period of no longer than three years.

In reference to the question regarding the business relationships and transactions among board members, we believe the questions and instructions should clarify that any business transaction (e.g., contractual) that is not relevant to the filing organization (e.g., where two members may also serve on, but not control, another organization's board, which is unrelated to the filing organization), should not require disclosure. A significant compliance burden is imposed on a filing organization to have to seek out these relationships.

Part III, Governance

Page 19 of the instruction states that "all organizations must answer each question in section III even though certain policies and procedures may not be required under the Internal Revenue Code." The instruction inappropriately seems to suggest that the IRS does not have the statutory and regulatory authority to seek the desired information "for the purpose of carrying out the internal revenue laws" as section 6033(a) provides. The IRS should not require an organization to answer specific questions unless it believes the answer serves a valid tax administration purpose. The IRS has penalty enforcement authority to require completion of returns. IRS should not require answers to questions that have no foundation in the Internal Revenue Code.

To be clear, we are not suggesting that the IRS lacks the authority to require the type of information being requested under this part. We believe this instruction should be re-evaluated and reworded.

The focus of Part III, questions 3b, 9 and 10, and the implication of a response are unclear and these questions should be dropped.

Part III, line 11 inappropriately suggests that the public availability of the six items listed is a requirement. We are unaware of any federal requirement for the public availability of an organization's financial statements or audit report. Line 11 should be reworded to remove that incorrect implication.

Second, there are a number of questions which are narrowly focused and do not lend themselves to useful solicitation of information. For example, item 3b requests that the "number of transactions" reviewed under a conflict of interest policy be reported. It is unclear how the number of transactions, alone, provides a reader with useful information. Further, it does not allow for uniformity of review as there may be different policies under which certain transactions are reviewed.

Similarly, item 10, for which there are no draft instructions, requesting whether the governing body review the Form 990 prior to filing, does not (a) make clear that this is not a state or state

regulatory requirement, (b) fails to take into account whether a committee of the Board may review the Form 990, and (c) fails to suggest the level of review or scrutiny.

Part IV, Statement of Revenue

We believe that in comparison to the current return (2006 Form 990), this newly redesigned section of the return seems less informative. This new draft Part IV eliminates the 2006 Form 990 return's use of two important areas for the reporting and treatment of the unrelated business income by the filing organizations: (1) exclusion codes relating to certain income items from unrelated business income, and (2) an explanation of how each related income stream contributes importantly to exempt purposes.

A purpose of the exclusion code is to serve as a record as to the narrow focus of certain exclusions available in the Internal Revenue Code. It also facilitates taxpayer compliance by allowing a taxpayer, quite simply, to disclose its position in this regard in a transparent way. Importantly, tax preparers without exclusion codes will have less basis upon which to review the taxpayer's position on exclusion.

This Part IV, as currently drafted, will complicate the preparer's role as to the understanding of the basis of the exclusion for a particular income stream. Eliminating the exclusion codes is a step backward from reporting unrelated business income in an understandable way.

Accordingly, we recommend the IRS reconsider the elimination of these exclusion codes in the interest of increased transparency, accountability, and disclosure. Finally, no longer requiring an explanation of the relatedness of certain income items does not facilitate taxpayer reporting, IRS enforcement, or help to improve public confidence that unrelated business income is being properly treated.

Other items for IRS's consideration on this Part are as follows:

Part IV, Lines 1c and 11. The line items for fundraising contributions and fundraising revenue, respectively, are interrelated. To help readers and users of the form understand the relationship between the two lines, Line 1c should be revised and clarified as follows: "Fundraising events (See line 11 for corresponding event revenue)".

Part IV, Lines 1f and 3, relating to other contributions and membership dues and assessments, respectively. Part IV should be reorganized to clarify the treatment of membership dues. The instructions to line 3 are informative and should be better integrated into Form 990. Instead of including the non-benefit, related membership dues on Part IV Line 1f, other contributions, a separate line item, could be created for the non-benefit related membership dues. Also, organizations that divide membership dues between Lines 1f and 3 should attach a statement explaining this treatment.

Part IV, Lines 2 and 3, relate to Medicare/Medicaid payments and membership dues and assessments, respectively. The space in columns (c) and (d) corresponding to these lines could be shaded out, because these revenue streams would not give rise to unrelated business.



Part IV, Line 5, dividends and interest from securities. The description of this line item could use some clarification. This line should not simply include dividends and interest from securities. According to the instructions, it should also include interest on notes receivable. The IRS should reword this line item to be consistent with the applicable instruction.

Part IV, line 9d, net rental income should clarify that columns (i) and (ii) should be combined as does line 10d regarding investments. Line 10d, net gain or loss from investments, specifies that the organization should combine securities in column (i) and other in column (ii). Line 9d does not specify the same point. The IRS should revise its language to make the wording consistent between the two lines.

Part IV, Lines 10a & 10d, relate to gains and losses from the sale of assets other than inventory. The descriptions of these lines on Form 990 are not consistent. Line 10a should read "gross proceeds from sales of assets other than inventory" and line 10d should read "Net gain or (loss) from sales of assets other than inventory."

Part IV, Line 14, total revenue. The description should read "Add lines 1h, ...and 13e." Line 1g is the non-cash contributions, not the total contribution revenue (line 1h). Line 13c is a line item of miscellaneous revenue, not the total miscellaneous revenue (line 13e).

Part V, Statement of Functional Expenses

Critical to consistent reporting throughout the Form, we urge the IRS to reconsider the instructions for line 5 related to compensation of current officers, directors, etc. As discussed earlier, reporting compensation based on Forms W-2 and 1099 allows for a practical and uniform standard of reporting. We recommend the reporting for this line be consistent with this standard.

The lobbying item on line 11d would permit non-uniform and inconsistent reporting. The applicable instruction is vague and unhelpful. There are many definitions in the Internal Revenue Code for lobbying depending on many factors. For example, public charities have different rules based on whether a section 501(h) election was made or not and section 501(c)(6) trade associations are subject to other requirements. It is unclear what definition is to be used for disclosure on this line and for what type of organization. Therefore, we recommend the elimination of this disclosure as a line item on the statement of functional expenses.

With regard to line 11f related to investment management fee disclosure, very often this information is not readily available, based on our experience, in a separate schedule from third-party investment managers. For example, a hedge fund, in which a filing organization may invest, may consider such fees as a reduction of the return on investment. This fund does not separately track, or otherwise provide, this information to its investors. Disclosure of this information would require an additional compliance burden to attempt to gather this information. Accordingly, we recommend elimination of this line.

Line 21 requires disclosure for payments to affiliates. Throughout this Form there is reference to payment to or relationship with "related organizations," affiliates, controlled entities, etc. We recommend the IRS review all these references and provide uniform rules for reporting.

 **Part VI, Balance Sheet**

Part VI, Line 5. The wording here is potentially misleading. The line item describes receivables from current officers, directors, trustees, key employees, or other related parties. However, the instructions and Schedule D refers to both current and former officers. The line item should be reviewed accordingly.

Part VI, Lines 4, 5, 6, and 7, relating to various receivables. The current Form 990 requires organizations to include the gross receivables as well as any allowance for doubtful accounts. We fail to see why the current reporting format is being altered.

Part VII, Statements Regarding General Activities

As currently drafted, this section does not signify any discernible rationale regarding the ordering of questions. We believe the questions should be presented in some logical order to help the filing organization understand the intent, purpose, and applicability of each question. For example, sprinkled among questions regarding activities are trigger questions, requiring additional information. We suggest the IRS group all trigger questions together here and throughout the Form. We further recommend that the IRS reconsider the ordering of the questions to improve the flow and readability of the questions.

In order to provide accurate and consistent responses to the questions, organizations should have a complete understanding of what is being asked. In the following areas, the instructions or question fail to provide an adequate definition for certain key terms. Without further clarification, the filing organization may provide an inappropriate answer to the question.

Part VII, Line 1c. A definition should be provided for the term "an interest in, or signature or other authority, over a financial account." See also our comment on Schedule F, Statement of Activities Outside of the U.S.

Part VII, Line 6b-d relating to tax-exempt bonds. A definition for "temporary period exception" may be warranted in the instructions to Part VII, Line 6b. While this term is common bond terminology, a definition might be provided for the Form 990 preparer who may not be familiar with it. At a minimum, reference might be made to Internal Revenue Code Section 148. Similarly, the Core Form, Part VII, Lines 6c and d instructions do not provide guidance for these lines. The instructions might provide a definition of "escrow account," "advance refunding escrow," and "acting as an 'on behalf of issuer.'"

Part VII, Line 8 relating to the use of a partnership, LLC, or corporation to conduct exempt activities. As mentioned above, throughout this Form there is reference to disclosure of relationships and/or payments to affiliates, related entities; and "controlled organizations." In question 8, there is yet another disclosure for related entities where there is more than 50% control or less of a partnership, LLC, etc. We recommend that all such interests be disclosed whether above or below the 50% threshold. In addition, Question 8c, as worded does not promote meaningful compliance. It asks whether the filing organization had an interest in a partnership, LLC, etc. where taxable entities controlled. A "yes" response may be construed as an admission of non-compliance with certain standards established under intermediate sanctions legislation and its progeny.

Without further clarification, this question is misleading and should be reworded or removed.

Part VII, Line 9 relating to the provision of hospital or medical care. The definition of "medical facility" triggering Schedule H for "hospitals" is overly broad. This definition currently includes any organization maintaining a facility that provides medical care. As drafted, this may include clinics or an infirmary for students maintained by a university. We would recommend narrowing this definition to focus on hospitals.

Part VII, Lines 11 and 12 relate to whether an organization has a written policy requiring the organization's maintenance of exempt status. Although a good reminder to filing organizations of the importance of monitoring changing operations in light of the need for preservation of exempt status, we note that only fairly sophisticated organizations would likely answer "yes" to these questions. A "no" response might be interpreted by readers as disparaging to the organization. This question does not enhance transparency. We request clarification in the instructions to clarify better the importance and intent of this question.

Part VIII, Statements Regarding Other IRS Filings


To enhance transparency and to further the education of exempt organization managers, we recommend the IRS consider reordering the questions to allow for a more logical understanding of each. If part of a core form, each question should direct the attention to the relevant question supported by the type of entity of the filer. We recommend that each question (1) identifies clearly the type of organization it is intended to apply to (e.g., section 501(c)(3) or 501(c)(4)), and (2) be grouped together according to IRC classification.

We note that it appears that some seemingly relevant tax questions have been eliminated from the new draft Form. For example, Sections 501(c)(6) and 501(c)(9) organizations are not referenced in this Part, nor are the specific questions, (e.g. proxy tax related to lobbying by a Section 501(c)(6) organization) included here. We recommend that such questions pertinent to the tax compliance of these organizations be included in the redesigned Form 990 as in the current 2006 Form 990.

We suggest the IRS consider alerting organization managers to which responses might trigger the filing of Form 4720, as does Form 990-PF Part VII-B (e.g. lines 5, 6 and 7).

Part IX, Statement of Program Service Accomplishments

As currently drafted, the applicable instruction to Line 3 invites the filing organization to report donated services in direct revenue. As donated services may be subject to different methods of valuation and are often reconcilable items from an organization's financial statements, suggesting its inclusion in direct revenue under column (A) would detract from notions of uniform reporting. We recommend elimination of any reporting of donated services, except perhaps as a memo item. In addition, there is an asterisk next to "Direct Revenue" with no corresponding asterisk reference on page 10 of Form 990.

 We also suggest the asterisk indication that Line 3, column (B), Program Service Revenue must equal Part V, line 24, column (B) should be placed next to line 3e where the actual reference is more appropriate.

Schedule A, Public Support Analysis

Schedule A, Part I, Line 11h. To enhance transparency, we suggest that the IRS consider whether "Type III-Other" supporting organizations be required to disclose the percentage of income paid out to its supported organizations. As the IRS is aware, this measurement is an essential yardstick for compliance by these organizations; and accordingly should be disclosed on the Form.

Furthermore, we would suggest, to promote compliance and minimize the burden for implementing new disclosure for public support, continued use of the support schedule design as it appeared in the 2006 Form 990, Schedule A. This combined presentation worked quite well and was efficient in terms of space utilization and ease of compliance.

Schedule A, Part II, Line 19. To further all three IRS guiding principles, we would recommend adding a one-page supplement to Schedule A designed for organizations subject to the 10% facts and circumstances test. Otherwise, it is not clear how such compliance would be standardized or accommodated through E-filing or transparent disclosure.

Schedule B, Schedule of Contributors

We request that the instructions provide clarification about the required disclosure or non-disclosure of government support on Schedule B, Schedule of Contributors.

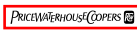
Schedule C, Political Campaign and Lobbying Activities

This Schedule is confusing to the reader in two ways. First, political campaign and lobbying activities are grouped together in this one Schedule despite the fact that these activities are separate and distinguishable, each having its own tax consequences. Secondly, lobbying activities are defined differently for different types of organizations and for different purposes. We recommend that two separate schedules be adopted to promote more clarity--one for political campaign activity and another for lobbying (e.g., Schedules C1 and C2).

Schedule D, Supplemental Financial Statement Detail

Schedule D, Parts XIV and XV. The IRS has requested comments on whether it is accurate to say that few organizations have anything to report on the reconciliation of the audited financial statements with the tax return. In our experience, we have not found this statement accurate. Most organizations, in our experience, complete the reconciliation statements. At the very least, a fair number of organizations have unrealized gains or losses and donated services which are reported on this statement.

We recommend that the reconciliation statement be moved to the main core of the Form 990. Such a reconciliation statement is important information to the overall revenue, expenses, and balance sheet and should be reflected, not in Schedules, but rather in the core form.

 With regard to Schedule D, Part VI, we request more clarity and information as to why the IRS has chosen to fill in the descriptions for "intangible assets." In the instructions to the Part VI, the IRS has already specified that "other assets" include intangible assets such as goodwill.

With regard to Schedule D, Part XI, the IRS might revise the form and/or instructions to provide additional guidance on what type of trust/escrow accounts about which it is seeking disclosure.

We would like to reserve the opportunity for submitting comments on FIN 48.

Schedule E, Private Schools

No comments at this time.

Schedule F, Statement of Activities Outside the U.S.

Our comments and recommendations with regard to redesigned Form 990 Schedule F are as follows:

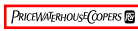
For foreign worker safety and security reasons, we believe that much of the information requested by the Service on the draft Schedule F should not be open to public inspection on Form 990. Foreign workers in certain countries are unwelcome by some groups which may hold specific ideological agendas. Although individual names of workers are not disclosed, it is possible that where a particular organization has deployed foreign workers (e.g., to seek out refugees in war-torn areas), some groups in the same countries supporting certain ideological agendas might seek to target foreign workers associated with that organization. Making information publicly available that potentially identifies an organization's activities in certain foreign countries could jeopardize the safety of the individuals performing those charitable activities.

Exempt organizations, particularly E-filers, will experience an excessive burden to comply with the new reporting requirements imposed by draft Schedule F. By comparison, the foreign reporting requirements outlined in draft Form 990, Schedule F, are considerably more onerous than the current public reporting requirements required for private foundations under the "expenditure responsibility" requirements outlined in Treas. Reg. §53.4945-5(c)(2).

Given that many organizations are heavily engaged in foreign grant activities (in some instances providing thousands of foreign grants), if the IRS insists on collecting the foreign data as presented in Schedule F, then the IRS should redesign Schedule F to more closely match the repeating page format of Schedule B, Schedule of Contributions Parts I, II, and III.

Part I, Line 1, column (b) of Schedule F asks for the "accounts *or* offices" whereas the instructions for this line state "accounts *and* offices." These should be made consistent.

The trigger question that relates to Part I, Line 1, column (b) of Schedule F is Form 990, Part VII, Lines 1b and 1c, whereas the trigger question that relates to Part I, Line 1, column (c) of Schedule F is Form 990, Part VII, Line 1b. This juxtaposition is confusing for the reader and the designations on Form 990, Part VII and Schedule F should be made consistent.

 Moreover, the instructions to Form 990, Part VII, Line 1c (which relates to Schedule F, Part I, Line 1, column (b)), concerning foreign accounts, seeks reporting on a calendar year basis consistent with Treasury Department Form TD F 90-22.1. However, the instructions to Schedule F, Part I, Line 1, column (c), relating to number of employees states that the number of employees should be reported as of, "the organization's tax year." The IRS should explicitly make reporting in column (c) on a calendar year basis to be consistent with column (b) to match the calendar year basis for the reporting of the number of employees on Form 990, Part VIII, Line 9a.

As mentioned above, Schedule F requires that information regarding foreign account information be reported on a fiscal year end basis, whereas the current Treasury Department Form TD F 90-22.1 requires that foreign account information be provided on a calendar year basis. This difference in time period reporting creates an additional burden and contributes to the wasteful diversion of charitable assets merely so an organization can be in compliance with both reporting requirements.

This issue raises concerns as to what the Service desires to be reported to it on an annual basis versus what it feels should be disclosed to the public on a fiscal year end basis. Form TD F 90-22.1 already accomplishes this reporting from the Service's perspective. Form 990 reporting requirements should either be "synchronized," or one of them should be eliminated.

The instructions for Form TD F 90-22.1 give detailed, yet still vague, definitions as to what constitutes a "Financial Interest" in a foreign account. With so many endowments investing in alternative investments, and whether such investments constitute a "Financial Interest" in a foreign account that should be reported on Form TD F 90-22.1, the instructions for Schedule F do not provide similar guidance or definitions as outlined in the instructions for Form TD F 90-22.1 and, more particularly, the instructions for Schedule F do not address Foreign activity in a country for Passive Investment Purposes only. Currently, Schedule F only focuses on an exempt organization's active, and not passive investment activities. We recommend the instructions be revised to provide more clarity in this regard.

Line 5a of Schedule F relates to grant recipients and introduces an unprecedented new concept of relationship to "any person with an interest in the organization, such as a donor, director, trustee, creator, highly compensated employee, or member of the selection committee." This term is overly broad and should be restated to correspond with the established "Disqualified Person" definition as described in Code Section §4958. If not, then a clear definition of what the term means should be provided in the Form 990 instructions. Even with an inclusion of a new definition, the creation of this new class of relationship would create a significant additional administrative burden on all exempt organizations that have foreign activities.

Given our past experience with E-filing Forms 990, there may be rejections of E-filing submissions in certain data fields that contain punctuation data characters other than a "dash" or "apostrophe" and data that has more the one "space" character in-between words. As most organizations have software and database information that contain other punctuation that will be rejected by the Service, such as "periods," "commas," etc. in their foreign activity databases, the Service should update its E-filing software to accept such punctuation from E-filing transmissions before implementing Schedule F to reduce the administrative burden placed on exempt organizations to strip out such punctuation from its foreign filing requirements.

Schedule G, Supplemental Information Regarding Fundraising Activities

In the instructions for Schedule G, Who Must File, the reference should be \$10,000 or more on Form 990, Part IV, Line 11a or \$10,000 or more on Form 990, Part V, Line 11e. It looks like the instructions omitted the "e".

Schedule H, Hospitals

Importantly, we note here again, and as we have discussed above, that the trigger for this Schedule, i.e., an organization maintaining a facility that provides medical or hospital care is overly broad. We suggest the IRS specify the applicability of this Schedule to any organization that is "licensed" by a state to operate as a hospital.

Schedule H will assist healthcare organizations to implement the recommendation of the Catholic Health Association regarding community benefit, which we endorse. We applaud the IRS for creating a tool to capture and disclose this crucial information. Nevertheless, we do have some suggested comments in this regard.

First, in Part I, integrated health systems are composed of both separately incorporated hospitals, as well as other health care organizations. Such systems commonly calculate and report community benefit on a system-wide basis. Currently, such systems do not necessarily have the ability to report each item of information for this part on an entity-by-entity basis. Also, the costs for some activities (e.g., costs of conducting a community needs assessment) may be shared across the various entities in the system. Thus, if accurate community benefit information was not available, the IRS goal of transparency would be adversely affected because there would not be an accurate picture of an organization's operations, and comparisons to other organizations would be inaccurate. Thus, the IRS should consider allowing combined community benefit reporting for integrated systems. Such combined reporting for an entire health system would be consistent with the integral-part test for exemption.

Second, Part I, Line 1, as reported in the Hospital Compliance Project, Interim Report, 44% of the respondents indicated that they treat bad debts as uncompensated care. In looking to report uncompensated care, hospitals make the determination of whether an individual qualifies for uncompensated care throughout the revenue cycle (i.e., prior to receiving treatment, upon presentation for treatment, upon discharge, during the billing process, during the collection process, etc.). Owing to the issues associated with identifying individuals who qualify for uncompensated care, hospitals continue to have difficulty of separating traditional uncompensated care from true bad debt. Moreover, some states require hospitals to include bad debt expense in reporting uncompensated care. Thus, the IRS should consider allowing hospitals to also report bad debt expense on Schedule H to allow comparison of organizations by showing costs of uncompensated care and bad debt expense.

Third, referring to Part I, Line 8, in calculating community benefit, hospitals would only be allowed to include the uncompensated expenses related to research conducted by the organization. However, many hospitals engage in research that serves the community, but such activities are funded by government, most notably the National Institute of Health. It has always been viewed that scientific research in the public interest, which includes research performed for the United States, is an exempt purpose under IRC section 501(c)(3). The

definition of research should be modified to allow hospitals to include in the calculation of community benefit the value of scientific research in the public interest.

Fourth, in Part II, Billing and Collections, asks for detailed financial information that may go beyond what is necessary for full disclosure to the public regarding tax-exempt activities. We recommend that this section be eliminated or altered to request reporting of less detailed information.

Fifth, in Part III, organizations completing Schedule H would need to report information regarding management companies and joint ventures twice on the redesigned Form 990, once on Schedule H, Part III and once on Schedule R. Moreover, the issues related to exemption and unrelated business income tax when organizations enter into arrangements with officers, directors, etc., or employees are the same for hospitals and any other organization described in IRC section 501(c)(3). Thus, in looking to minimize the administrative burden on filing organizations and the level of detail required on Schedule R, the IRS should consider eliminating Schedule H, Part III or limiting the reporting there to management companies and joint ventures involving officers, directors, etc., or physicians where the organization maintains a 50% or less ownership interest.

The IRS should consider allowing a transition period for organizations to implement the data collection and financial reporting procedures necessary to comply with the proposed Schedule H disclosures. Some healthcare organizations will require the purchase of new information management systems and even the creation of new administrative employee positions in order to comply. We would suggest at least a two-year transition period.

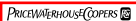
Schedule I, Supplemental Information on U.S. Grants

Part II, column (c) of this Schedule is required to be completed if the recipient organization has tax-exempt status under section 501(c). However, Part II does not provide the opportunity to distinguish between grants to governmental entities and grants to other entities, such as for-profit organizations. The Service could remedy this by revising column (c) to require the organization to identify whether the grant recipient is a section 501(c) organization (and, if so, list the paragraph), a governmental entity or instrumentality, or a for-profit organization.

With regard to Part II, columns (e) and (f), the instructions for these columns state, "[w]hen fair market value cannot be readily determined, use an appraised or estimated value." It would be helpful for the instructions to clarify whether an employee of the organization is permitted to make this determination, or whether the appraisal or estimated value must be obtained from an independent third party.

As to Part III, we applaud the Service for abolishing the requirement to list the names of individuals who were provided scholarships or other financial assistance from organizations other than colleges, universities, and primary and secondary schools.

Regarding the definition of grants or specific assistance to individuals in the United States, the proposed instructions to this Schedule currently define grants or specific assistance to individuals in the United States as "grants or assistance to persons who are citizens or residents of the United States, but do not include grants or assistance to citizens or residents of the United States living in foreign countries or for the primary purpose of study or research in

 foreign countries." Furthermore, the instructions state, "[t]he organization should make this determination based on its knowledge of the recipient's status or from information readily available from which a reasonable determination can be made."

We can envision many different scenarios that could generate much confusion based on this current language. For example, how should an organization classify an individual who is a U.S. citizen that was living abroad, but will be returning to the U.S. to attend school? Should the determination be made at the time the individual is selected as a recipient (when such individual may still be living abroad), or should it be based on the recipient's residency at the time the scholarship is actually paid (which may occur once the student has relocated back to the U.S.)? Yet another alternative would be to simply make the determination based where the individual will be attending school. We believe further guidance on how and when to make this determination is warranted.

The instructions to Part III, line 1, column (a) appear to contain a typographical error. The third sentence contains the language, "...scholarships to a particular country or school. . . ." Because Schedule I pertains to domestic grants, the Service apparently meant to use the word "county" rather than "country."

Schedule J, Supplemental Compensation Information

We have two comments regarding compensation reporting. First, we strongly suggest that the IRS remove reporting of expense reimbursements from the computation of compensation on this schedule. Schedule J, Question 3, as phrased, requires disclosure of the types of reimbursement listed (first-class travel, club dues and personal residence). These payments are all permissible under the I.R.C. and Treasury Regulations when appropriate. If such reimbursements are made under an accountable plan prescribed by the IRS and section 162, they are not treated as compensation.

Second, we recommend that disclosure of any de minimis fringe benefit (e.g. as prescribed under section 132) not be required reporting on this schedule. To track these amounts, when they are not otherwise required to be tracked under the IRC, would require additional systems be established for many filing organizations. Moreover, Reg. Sec. 53.4958-4(a)(4), relating to excess benefit transactions, specifically provides that non-taxable fringe benefits and expense reimbursements pursuant to accountable plans are disregarded. Accordingly, we recommend that this disclosure not be required here.

Schedule K, Tax Exempt Bonds

We anticipate that Schedule K will promote compliance and enhance transparency through gathering additional information on bonds issued on behalf of tax-exempt organizations. We applaud this effort and expect this added disclosure to encourage organizations to look more closely at how their tax-exempt bonds are used and to proactively maintain records regarding such use. Nevertheless, we will offer a few concerns regarding the presentation required by draft Schedule K.

Schedule K, Part I, Bond Issues. The relevance of requiring the filing date of Form 8038 in column E is unclear. Also, Part I, Columns F and G provide one space for a description of purpose and date the bond-funded asset was placed in service. However, bonds may fund

more than one project, and there may be multiple dates that assets are placed in service. The IRS might revise this section to allow for additional lines to accommodate assets relating to several projects and the dates they were placed in service. The instructions might also read, "If there are more projects funded than lines provided, attach additional copies of Part I for those projects." In the alternative, the IRS might ask for a general purpose of the bond use, such as "construction" or "refunding." The purpose is requested in the current Form 990, but no guidance is provided as to the level of detail required, which would be helpful.

Schedule K Part II, Proceeds. The instructions to Schedule K Part II, Line 1 might refer the preparer to Form 8038 for the information needed specifically for this line. Reference to Form 8038 for useful information might also be a helpful general instruction for completing Schedule K.

Schedule K, Part III, Private Use. Overall, our concern with Part III of Schedule K is whether the Form is seeking information that will aid the IRS, the filing organization, or any other reader in determining whether an organization has bond-financed projects with excess private use. For example, even if an organization does not meet the safe harbor standards under Rev. Proc. 97-13 and Rev. Proc. 2007-47 as asked in Lines 2b and 3b, it is not conclusive that income is derived from private use. (Note that Rev. Proc. 2007-47 recently superseded Rev. Proc. 97-14. Schedule K, Part III, Line 3b will need to be updated accordingly). Such determination is based upon all facts and circumstances. Nevertheless, if an organization responds "no" to these questions, a negative inference could be inappropriately drawn by the reader.

Similarly, Line 4 does not address private uses other than non-safe harbor management and research contracts. Further, if an organization has entered into a management contract or a research agreement that satisfies the safe harbor requirements of Rev. Proc. 97-13, an organization should not have to track the amount of space used for this purpose and the percentage of a project subject to either a management contract or a research agreement is irrelevant.

Rather than ask whether an organization meets safe harbor requirements for management contracts or research agreements, the Form might ask whether the organization generally quantifies the amount of private use of bond proceeds. Because the Form is a one-year snapshot of the organization's activities, but the average percentage of private use is analyzed over the life of the bond, the IRS may consider asking for an average percentage of private use during the life of the bond. The organization could retain documentation of its private use calculation. By disclosing private use only for the reporting year, an organization may be viewed unfavorably if its private use exceeds the threshold for a given year, despite having private use that, on average, is below the limit. Alternatively, the IRS could require every organization with tax-exempt bonds to file Form 8038-T every five years, even if no rebate is due, and add questions from Schedule K to this Form. This approach would consolidate all tax-exempt bond questions in one location and would allow for an analysis of private use over the appropriate time frame.

Schedule L, Loans

No comments at this time.

Schedule M, Non-Cash Contributions

This new Schedule M, reporting non-cash contributions, should be read in light of the Form 8283, *Noncash Charitable Contributions*, which is filed by the donor with the IRS and also reports non-cash contributions. Form 8283 is a required schedule in certain circumstances to support a charitable contribution deduction for the donor and addresses non-cash contributions in great detail. However, in certain areas, Schedule M is inconsistent with the Form 8283.

Most importantly, Schedule M differs from Form 8283 in the area of appraisals. Form 8283 does not require a written appraisal for seven specific exceptions listed in the instructions for Form 8283 Section B. Nevertheless, the new Schedule M requires an organization to place a value on all donated items if it reports more than \$5,000 of aggregate non-cash contributions without reference to the exceptions. We suggest the IRS reconsider this requirement.

The requirement, as it is worded in the draft Form 990, places many filing organizations in the awkward, unqualified, and, therefore, inappropriate position of becoming an appraiser. Many filing organizations holding significant donated assets, such as works of art, are not required to appraise these donations for audited financial statement purposes, for insurance purposes, or for general operational purposes. The requirement to provide a value for donated items would create an additional and significant administrative burden for filing organizations for which the organization lacks the competency to provide meaningful and useful information.

We recommend a general removal of this requirement for valuation. However, if the IRS still seeks to require valuation reporting, we recommend that at a minimum, an organization be permitted to note that "it is not a qualified appraiser and therefore the valuations provided for items not appraised by qualified appraisers, were determined to the best of the organizations ability solely for purposes of satisfying IRS reporting requirements." In addition, the Service may wish to consider including a box next to each item, which the organization would check, for items that the organization acknowledged on Form 8283 Section B, Part IV.

Schedule N, Liquidation, Termination, Dissolution, or Significant Disposition of Assets

The Service requires in Part I that the organization provide support by attaching a certified copy of its articles of dissolution or merger, resolutions, and plans of liquidation or merger as well as any other appropriate documentation, such as a determination letter from the IRS ruling that the organization is no longer exempt under section 501(a) of the Internal Revenue Code, or a private letter ruling issued by the IRS approving the organization's proposed dissolution or liquidation.

In this situation it is not clear whether this schedule is necessary. We request more clarity in the instructions in this regard.

Alternatively, the IRS should consider allowing PDF attachments for compliance with this requirement for the electronic filing organizations or provide clear guidance relating the process in which these attachments are to be submitted electronically to the IRS.

 **Schedule R, Related Organizations**

As mentioned above, we would recommend that the IRS rework all references to related organizations, controlled organizations, or payments to affiliates to provide consistent definitions or otherwise distinguish the differences throughout the Form.

In Part V, organizations are required to report if they engaged in any of the transactions listed in Part V with a related organization (other than a disregarded entity). The definition of "related organization" for purposes of Schedule R expands the disclosure requirements of section 6033(h) of the Internal Revenue Code. Section 6033(h) requires disclosure of transactions between controlling and controlled organizations within the meaning of section 512(b)(13). In general, "control" under section 512(b)(13) requires more than a 50% ownership interest.

However, the Schedule R instructions, in defining a related organization and control with respect to taxable organizations, include: (i) being a managing partner or managing member in a partnership or limited liability company which has three or fewer managing partners or managing members, and (ii) being a general partner in a limited partnership which has three or fewer general partners. By requiring organizations to complete Part V, as drafted, with respect to transactions with these organizations, the IRS is requiring organizations to expand significantly their reporting obligations.

More specifically in Part V, Line 1, we suggest the IRS incorporate into Line 1 of the schedule the two transactions specified in the instructions that are to be disregarded. Both types of transactions are very important exclusions. Therefore, they should be clearly stated in the question on the schedule.

VI. Conclusion

We thank the IRS for the opportunity to submit our comments and suggestions to help improve the development of the new redesigned Form 990. Please contact Marcia Krause at (202) 414-1012, Laura Parello at (646) 471-2472 or Howard Schoenfeld at (202) 414-1717, if you would like to discuss our comments further.

Sincerely,



Marcia K. Krause
Tax Partner
PricewaterhouseCoopers LLP

Return of Organization Exempt From Income Tax

Under section 501(c), 527, or 4947(a)(1) of the Internal Revenue Code (except black lung benefit trust or private foundation)

20XX

Open to Public Inspection

Department of the Treasury Internal Revenue Service (77)

The organization may have to use a copy of this return to satisfy state reporting requirements.

A For the 20XX calendar year, or tax year beginning, 20XX, and ending, 20

- B Check if applicable: Address change, Name change, Initial return, Termination, Amended return, Application pending

C Name of organization, D Employer identification number, E Telephone number, F Name and address of Principal Officer

Space should be used more efficiently. p. 4

G Website, J Books

Space should be used more efficiently. p. 4

I Accounting method: Cash, Accrual, Other

H Enter amount of gross receipts \$

K Organization type (check only one) 501(c) () (insert no.) 4947(a)(1) or 527

L Year of Formation, M State of legal domicile

Part I Summary

Should add determination letter date and legal structure. p. 5

Need to expand to accommodate foreign organizations. p. 4

Table with 3 columns: Description, Amount, % of Total. Rows 1-10: Mission, Activities, Governing body, Members, Employees, Compensation, etc.

Metrics do not serve a useful purpose and should be dropped. p. 6

Table with 3 columns: Description, Amount, % of Total. Rows 11-21: Revenues (Contributions, Program service, etc.), Expenses (Program service, Management, etc.), Net income

(1) The Summary page should only include information that is pertinent to all, or almost all, filers, (2) a list of all Schedules to the Form 990 should be listed and each filer should be required to check the boxes for those Schedules that are attached as part of the filing organization's return, and

Table with 3 columns: Description, Beginning of Year, End of Year. Rows 22-24b: Total assets, Total liabilities, Net assets or fund balances, Total expenses as percentage of net assets

(3) any information not required to be completed by all organizations be moved from the Summary to a separate schedule or otherwise be arranged to avoid reader confusion. p. 5-6

Table with 5 columns: Description, (i) Gross Revenue, (ii) Expenses, (iii) Net to organization, (iv) Divide column (iii) by column (i). Rows 25-26: Gaming, Fundraising (other than gaming)

Space could be used more efficiently as 75% of filers will leave this section blank Therefore, this section should be removed from the summary page. p. 4

Part II Compensation and Other Financial Arrangements with Officers, Directors, Trustees, Key Employees, Highly Compensated Employees, and Independent Contractors

Section A Complete this table for all persons required to be listed. Attach additional pages as needed.

1a* List all of the organization's current officers, directors, trustees (whether individuals or organizations) and key employees regardless of amount of compensation. Enter -0- if no compensation was paid.

* List the organization's five highest compensated employees (other than an officer, director, trustee or key employee) who received reportable compensation of more than \$100,000 from the organization and any related organizations.

* List all of the organization's former officers, key employees or highest compensated employees who received more than \$100,000 of reportable compensation from the organization and any related organizations.

* List all of the organization's former directors or trustees that received, in their capacity as a former director or trustee of the organization, more than \$10,000 in reportable compensation from the organization and any related organizations.

PRICEWATERHOUSECOOPERS Reporting compensation disclosed on Forms W-2 and 1099 promotes a useful and uniform standard. p. 7

(A)	(B)						(C)	(D)	(E)	(F)	(G)		
Name, City, and State of Residence	Position (check all that apply)						Check box if full-time officer or employee	Reportable compensation from the organization	Reportable compensation from related organizations	Aggregate loans and other amounts owed to the organization	Aggregate loans and other amounts owed to related organizations		
<p>Disclosure of city may be privacy concern. p. 7</p> <p>PRICEWATERHOUSECOOPERS</p>	Individual Trustee or Director	Institutional Trustee	CEO or Executive Director	CFO or Treasurer	Other Officer	Key Employee	Other	Former					
<p>PRICEWATERHOUSECOOPERS</p> <p>The IRS should prescribe an ordering rule for reporting. We recommend that persons receiving compensation be disclosed first, according to positions (e.g., officer, director, etc.), and then in alphabetical order. Thereafter, unpaid persons (e.g., volunteer officers, directors, etc.) should be listed, similarly, by position, and then alphabetically. p. 7</p>													

1b Total

2 Total number of individuals who received more than \$100,000 in reportable compensation from the organization

Part II (Continued)

Section B

- | | Yes | No |
|---|-----|----|
| 3 For the CEO, Executive Director, Treasurer, and CFO listed in Section A, did the process for determining compensation include a review and approval by independent members of the governing body, comparability data, and contemporaneous substantiation of the deliberation and decision? | | |
| 4 Did any current officer or employee listed in Section A earn or accrue more than \$100,000 of non-qualified deferred compensation? | | |
| 5 During the tax year, did any person who is or was an officer, director, trustee, or key employee within the past 5 years: | | |
| a Have a family relationship with any other person listed in Section A? | | |
| b Have a business relationship with any other person listed in Section A? | | |
| c Have a business relationship with the organization (other than as an officer, director, trustee, or employee) directly or indirectly through ownership of more than 35% in another entity (individually or collectively with other person(s) listed in Section A)? | | |
| d Have a business relationship with the organization (other than as an officer, director, trustee, or employee) indirectly through a family member? | | |
| e Serve as an officer, director, trustee, key employee, partner or member of an entity (or a shareholder of a professional corporation), doing business with the organization? | | |
| f Complete this table if the organization answered "Yes" to any of lines 5a-5e (for lines 5a and b, complete columns (i)-(iii) only). | | |

Five year look back period is excessive unless individual is a "Disqualified Person." p. 8

(i) Name of Current or Former Officer, Director, Trustee, or Key Employee	(ii) Name of Individual or Entity	(iii) Relationship	(iv) Description of transaction	(v) Based on sharing of revenue or net earnings of organization? (Y/N)	(vi) Amount of the transaction
		Meaning of "Business Relationship" should be clarified. p. 8			
		PRICEWATERHOUSECOOPERS			

- | | Yes | No |
|---|-----|----|
| 6 Did the organization list any former officers, directors, trustees, key employees, or highest compensated employees in Section A? If yes, complete Schedule J | | |
| 7 For any individual listed in Section A, is the sum of columns (D) and (E) greater than \$150,000? If yes, complete Schedule J | | |
| 8 Did any individual listed in Section A receive or accrue more than \$250,000 of reportable or other compensation including deferred compensation, nontaxable fringe benefits and expense reimbursements? If yes, complete Schedule J | | |
| 9 Did any person listed in Section A receive or accrue compensation from any source other than the organization or a related organization for services rendered to the organization? If yes, complete Schedule J | | |

10a List the top five independent contractors that received more than \$100,000 of compensation from the organization. Exclude those included in 5f. Requiring reporting of only top five independent contractors detracts from transparency and accountability purposes when compared with 2006 Form 990. p. 7

(A) Name, City, and State of Residence	(B) Description of Services Provided	(C) Compensation

10b Total number of independent contractors (including those in 10a) that received more than \$100,000 in compensation from the organization

Part III Statements Regarding Governance, Management, and Financial Reporting

		Yes	No
1a	Enter the number of members of the governing body		
1b	Enter the number of independent members of the governing body		
2	Did the organization make any significant changes to its organizing or governing documents? If "Yes", briefly describe these changes. PRICEWATERHOUSECOOPERS		
The focus of questions 3b, 9 and 10, and the implication of a response, are unclear and these questions should be dropped. p. 8			
3a	Does the organization have a written conflict of interest policy?		
3b	If "Yes," how many transactions did the organization review under this policy and related procedures during the year?		
4	Does the organization have a written whistleblower policy?		
5	Does the organization have a written document retention and destruction policy?		
6	Does the organization contemporaneously document the meetings of the governing body and related committees through the preparation of minutes or other similar documentation?		
7a	Does the organization have local chapters, branches or affiliates?		
7b	If yes, does the organization have written policies and procedures governing the activities of such chapters, affiliates and branches to ensure their operations are consistent with the organization's?		
8	Does an officer, director, trustee, employee or volunteer prepare the organization's financial statements? Indicate whether an independent accountant provides any of the following services: PRICEWATERHOUSECOOPERS Compilation <input type="checkbox"/> Review <input type="checkbox"/> Audit <input type="checkbox"/>		
9	Does the organization have an audit committee?		
10	Did the organization's governing body review this Form 990 before it was filed?		
11	How do you make the following available to the public? Check all that apply. Organizing/Governing Documents <input type="checkbox"/> n/a <input type="checkbox"/> website <input type="checkbox"/> other website <input type="checkbox"/> office <input type="checkbox"/> other _____ Conflict of Interest Policy <input type="checkbox"/> n/a <input type="checkbox"/> website <input type="checkbox"/> other website <input type="checkbox"/> office <input type="checkbox"/> other _____ Form 990 <input type="checkbox"/> n/a <input type="checkbox"/> website <input type="checkbox"/> other website <input type="checkbox"/> office <input type="checkbox"/> other _____ Form 990-T <input type="checkbox"/> n/a <input type="checkbox"/> website <input type="checkbox"/> other website <input type="checkbox"/> office <input type="checkbox"/> other _____ Financial Statements <input type="checkbox"/> n/a <input type="checkbox"/> website <input type="checkbox"/> other website <input type="checkbox"/> office <input type="checkbox"/> other _____ Audit Report <input type="checkbox"/> n/a <input type="checkbox"/> website <input type="checkbox"/> other website <input type="checkbox"/> office <input type="checkbox"/> other _____		
12	List the states with which a copy of this return is filed: PRICEWATERHOUSECOOPERS		

The precise level of review sought should be clarified. p. 8

The wording of question 11 suggests inappropriately that these documents must be made publicly available under the IRC, and should be reworded p. 8

Part IV Statement of Revenue

PRICEWATERHOUSECOOPERS

Failure to explain relatedness negates transparency . p. 9

(A)	(B)	(C)	(D)
Total Revenue	Related or Exempt Function Revenue	Unrelated Business Revenue	Revenue Excluded From Tax under IRC 512, 513, or 514

Contributions, gifts, grants and other similar amounts	1a	Federated campaigns	1a				
	b	Outside fundraising or commercial co-ventures	1b				
	c	Fundraising events	1c				
	d	Related organizations	1d				
	e	Government grants (contributions)	1e				
	f	All other contributions, gifts grants, and similar amounts not included above	1f				
	g	Noncash \$ _____ Attach Schedule M.					
	h	Total					

Program Service Revenue	2a	Medicare/Medicaid payments	Business Code				
	b	Fees and contracts from government agencies					
	c	Revenue from related investments					
	d	_____					
	e	_____					
	f	_____					
	g	Total					

Guidance on the treatment of membership dues in the instructions should be incorporated directly on Form 990. p. 9

Lines 2 and 3 of columns c and d could be shaded, as these types of income would not give rise to UBI. p. 9

3	Membership dues and assessments						
4	Interest on savings and temporary cash investments						
5	Dividends and interest from securities						
6	Income from investment of tax-exempt bond proceeds						
7	Royalties						
8	Other investment income						

The description of line 5 should also include interest from notes receivable. p. 10

The relationship between lines 1c and 11 should be made explicit. p. 9

Other Revenue	9a	Gross Rents	(i) Real	(ii) Personal			
	b	Less rental expenses					
	c	Rental income or (loss)					
	d	Net rental income or (loss)					

Line 9d should explicitly combine the totals from columns (i) and (ii), as does line 10d. p. 10

Other Revenue	10a	Gross amount of sales of assets other than inventory	(i) Securities	(ii) Other			
	b	Less: Cost or other basis and sales expenses					
	c	Gain or (loss)					
	d	Net gain or (loss) from investments. Combine line 10c, columns (i) and (ii)					

The description of line 10a should read "Gross proceeds from sales of assets other than inventory" and line 10d should read, "net gain or (loss) from sales of assets other than inventory. p. 10

Other Revenue	11a	Gross income from fundraising events (not including \$ _____ of contributions reported on line 1c). Attach Schedule G if total exceeds \$10,000. If any amount is from gaming, check here					
	b	Less direct expenses	a				
	c	Net income from fundraising events	b				
Other Revenue	12a	Gross sales of inventory, less returns and allowances	a				
	b	Less cost of goods sold	b				
	c	Net income or loss from sales of inventory					

Miscellaneous Revenue		Business Code					
13a	_____						
b	_____						
c	_____						
d	_____						
e	Total						
14	Total Revenue. Add lines 1g, 2g, 3-8, 9d, 10d, 11c, 12c, and 13c						

This sum should include lines 1h and 13e p. 10

Part V Statement of Functional Expense

501(c)(3) and (4) organizations must complete all columns.

All other organizations must complete column (A) but are not required to complete columns (B), (C), and (D).

Table with 5 columns: (A) Total expenses, (B) Program service expenses, (C) Management and general expenses, (D) Fundraising expenses. Rows include categories like Grants to governments, Compensation of officers, and Total Functional expenses.

Draft as of 11/2007

PRICEWATERHOUSECOOPERS

Compensation disclosed here should be as reported on Forms 1099 and W-2, as in Form 990 Part 1. p. 10

The IRS should drop this line. p. 10

This information is often difficult to maintain. p. 10

PRICEWATERHOUSECOOPERS

The IRS should clarify what the definition of "affiliates" is in this context. p. 10

Part VI Balance Sheet

		(A) Beginning of year	(B) End of year
Assets	1 Cash—non-interest-bearing		1
	2 Savings and temporary cash investments		2
	3 Pledges and grants receivable, net	PRICEWATERHOUSECOOPERS	3
	4 Accounts receivable, net. Former officers should be included. p. 11		4
	5 Receivables from current officers , directors, trustees, key employees or other related parties. Complete Schedule L		5
	6 Receivables from other disqualified persons (as defined under section 4958(f)(1)) and persons described in section 4958(c)(3)(B). Complete Schedule L		6
	7 Notes and loans receivable, net. Gross receivable with allowance for doubtful accounts should be accommodated. p. 11		7
	8 Inventories for sale or use		8
	9 Prepaid expenses and deferred charges	PRICEWATERHOUSECOOPERS	9
	10 Investments—publicly-traded securities		10
	11 Investments—other securities. Complete Part I of Schedule D		11
	12a Investments—Land, buildings, and equipment: Cost basis. Complete Part II, Schedule D	12a	
	12b Less accumulated depreciation	12b	12c
	13 Investments—other. Complete Part III of Schedule D		13
	14 Investments—Program Related. Complete Part IV of Schedule D		14
	15a Program Related—land, buildings, and equipment: cost basis. Complete Part V of Schedule D	15a	
	15b Less: accumulated depreciation	15b	15c
16 Other assets. Complete Part VI of Schedule D		16	
17 Total assets. Add Columns A and B, lines 1 through 16 (must equal line 35)		17	
Liabilities	18 Accounts payable and accrued expenses		18
	19 Grants payable		19
	20 Deferred revenue		20
	21 Tax-exempt bond liabilities. Complete Schedule K		21
	22 Escrow account liability		22
	23 Payable to current and former officers, directors, trustees, or key employees (attach Schedule L)		23
	24 Mortgages and notes payable to unrelated third parties secured by:		
	a Investment property shown on lines 10, 11, 13, and 14		24a
	b Land, building, and equipment shown on lines 12 and 15		24b
	25 Unsecured notes and loans payable		25
26 Other liabilities. Complete Part VII of Schedule D		26	
27 Total liabilities. Add lines 18 through 26		27	
Net Assets or Fund Balances	Organizations that follow SFAS 117, check here <input type="checkbox"/> and complete lines 28 through 30, and lines 34 and 35		
	28 Unrestricted net assets		28
	29 Temporarily restricted net assets		29
	30 Permanently restricted net assets		30
	Organizations that do not follow SFAS 117, check here <input type="checkbox"/> and complete lines 31 through 35.		
	31 Capital stock or trust principal, or current funds		31
	32 Paid-in or capital surplus, or land, building or equipment fund		32
	33 Retained earnings, endowment, accumulated income, or other funds		33
34 Total net assets or fund balances		34	
35 Total liabilities and net assets/fund balances		35	

Part VII Statements Regarding General Activities

	Yes	No																				
1 Did the organization conduct any of the following outside the U.S.?																						
a grantmaking, fundraising, trade, business, or program service activities?																						
b maintain an office, employees or agents?																						
c maintain an interest in, or signature or other authority, over a financial account																						
If "yes" to any of these questions, complete Schedule F. Term should be clarified. p. 11																						
2 Did the organization receive or hold a conservation easement, including easements to preserve open space, the environment, historic land areas or historic structures? If yes, complete Part VIII of Schedule D and Schedule M																						
3 Did the organization provide credit counseling, debt management, credit repair, or debt negotiation services? If "yes", complete part XI of Schedule D.																						
4 Did the organization maintain any donor advised funds or any accounts where donors have the right to provide advice on the distribution or investment of amounts in such funds or accounts? If "yes", complete Part IX of Schedule D and Schedule M																						
5 Did the organization maintain collections of works of art, historical treasures, or other similar assets for public exhibition, education, or research in furtherance of public service rather than financial gain? If "yes", complete part X of Schedule D.																						
6a Did the organization have any tax-exempt bonds outstanding at any time during the year? If yes, answer 6b-6d and complete Schedule K. If no, go to question 7.																						
6b Did the organization invest any net proceeds of tax-exempt bonds beyond a temporary period exception?																						
6c Did the organization maintain an escrow account other than an advance refunding escrow at any time during the year to defease any tax-exempt bonds?																						
6d Did the organization act as an "on behalf of issuer" for bonds outstanding at any time during the year?																						
7 At any time during the year, Terms should be defined in the instructions. p. 11																						
a Did the organization own 100% of an entity disregarded as separate from the organization under Regulations section 301.7701-2 and 301.7701-3? If yes, attach Schedule R																						
b Was the organization related to any tax-exempt or taxable entity? If yes, attach Schedule R																						
8a During the tax year, did the filing organization conduct all or a substantial part of its exempt activities through or using a partnership, LLC, or corporation?																						
b If yes, identify below the name and primary activity of such partnership, LLC, or corporation in which the filing organization's ownership or control was 50% or less (attach additional pages if necessary):																						
<table border="1"> <thead> <tr> <th>Name</th> <th>Primary Activity</th> <th>Ownership %</th> <th>Type of Entity</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>			Name	Primary Activity	Ownership %	Type of Entity																
Name	Primary Activity	Ownership %	Type of Entity																			
Terms should be defined for consistency - control by taxable interests could imply violation of law. p. 11																						
c Is the organization a partner in a partnership, member of an LLC, or shareholder of a corporation that was managed by a company that was controlled by taxable partners, members or shareholders?																						
9 Did the organization operate, or maintain a facility to provide hospital or medical care? If yes, complete Schedule H. Term is overly broad. p. 11																						
10 Is the organization a school as described in section 170(b)(1)(A)(ii)? If yes, complete Schedule E																						
11 Does the organization have a written policy or procedure to review the organization's investments or participation in disregarded entities, joint ventures, or other affiliated organizations (exempt or non-exempt)?																						
12 Does the organization have a written policy that requires the organization to safeguard its exempt status with respect to its transactions and arrangements with related organizations?																						
13 Is the organization filing Form 990 in lieu of Form 1041? Enter the amount of tax exempt interest received or accrued during the year																						
14 501(c)(7) Organizations. Enter:																						
a Initiation fees and capital contributions included on Part IV, line 14	14a																					
b Gross receipts, included on Part IV, line 14, for public use of club facilities	14b																					
15 501(c)(12) Organization. Enter:																						
a Gross income from members or shareholders	15a																					
b Gross income from other sources (Do not net amounts due or paid to other sources against amounts due or received from them).	15b																					
16 Does the organization hold assets in term or permanent endowments? If yes, complete Schedule D, Part XII																						
17 Is the organization required to attach Schedule B, Schedule of Contributors?																						

Smaller organizations may not have a written policy in place and a "no" response might be construed as negative. p. 12

Part VIII Statements Regarding Other IRS Filings

	Yes	No
1 Did the organization engage in direct or indirect political campaign activities on behalf of or in opposition to candidates for public office? If "Yes", complete Schedule C, Political Campaign and Lobbying Activities.	1	
2 Did the organization engage in lobbying activities? If "Yes", complete Schedule C.	2	
3a Was the organization a party to a prohibited tax shelter transaction at any time during the tax year?	3a	
b Did any taxable party notify the organization that it was or is a party to a prohibited tax shelter transaction?	3b	
c If "yes" to 3a, did the organization file Form 8886-T, Disclosure by Tax-Exempt Entity Regarding Prohibited Tax Shelter Transaction?	3c	
4a Did the organization, during the year, receive any funds, directly or indirectly, to pay premiums on a personal benefit contract?	4a	
b Did the organization, during the year, pay premiums, directly or indirectly, on a personal benefit contract?	4b	
5a 501(c)(3) and 501(c)(4) Organizations. Did the organization engage in an excess benefit transaction with a disqualified person during the year?	5a	
b Did the organization become aware that it had engaged in an excess benefit transaction with a disqualified person during a prior year?	5b	
c If "Yes," complete the table below.		

Name of Disqualified Person	Description of Transaction	Corrected? (Y/N)

	Yes	No
d Enter the amount of tax imposed on the organization managers or disqualified persons during the year under section 4958.	5d	
e Enter the amount of tax on line 5d reimbursed by the organization.	5e	
6 501(c)(3) supporting organizations and sponsoring organizations maintaining donor advised funds. Did the supporting organizations, or a fund maintained by a sponsoring organization, have excess business holdings at any time during the year?	6	
7 501(c)(3) and other sponsoring organizations maintaining donor advised funds.		
a Did the organization make any taxable distributions under section 4966?	7a	
b Did the organization make a distribution to a donor, donor advisor, or related person?	7b	
8a Did the organization have unrelated business gross income of \$1000 or more during the year covered by this return?	8a	
b If "Yes," has it filed a Form 990-T for this year?	8b	
9a Enter the number of employees reported on Form W-3, Transmittal of Wage and Tax Statements filed for the calendar year ending with or within the year covered by this return.	9a	
b If at least one, did the organization file all required employment tax returns?	9b	
10a Did the organization provide Forms 1099 as required?	10a	
b If "Yes", indicate the number filed.	10b	
11a Did the organization provide goods or services in exchange for any contribution of \$75 or more?	11a	
b If "Yes", did the organization notify the donor of the value of the goods or services provided?	11b	
12a Did the organization solicit any contributions that were not tax deductible?	12a	
b If "Yes", did the organization include with every solicitation an express statement that such contributions or gifts were not tax deductible?	12b	
13a Did the organization sell, exchange, or otherwise dispose of tangible personal property for which it filed Form 8282?	13a	
b If "Yes", how many Forms 8282 did the organization file during the tax year?	13b	
14 For all contributions of qualified intellectual property, did the organization file Form 8899 as required?	14	

Part IX Statement of Program Service Accomplishments (See the instructions.)

1 Did the organization make any significant changes in its activities or methods of conducting activities? Yes No
If "Yes," describe these changes.

2 Describe the organization's most significant program service accomplishment for the year:

PROCEMATERHOUSECOPIERS

This description should be moved closer to line 3e, below. p. 12

**Total must equal Part V, line 24, column (B)

PROCEMATERHOUSECOPIERS

The instructions permit showing the amount of donated services etc., the reporting of which could be misleading. p. 12

(A) Direct Revenue*

(B) Program Service Expenses** Required for 501(c)(3) and (4) orgs. and 4947 (a)(1) trusts; optional for others

Table with 3 columns: Description (3a, b, c, d, e), (A) Direct Revenue, and (B) Program Service Expenses. Includes a 'Total' row circled in red.

Part X Signature Block

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Please Sign Here

Signature of officer, Date, Type or print name and title

Paid Preparer's Use Only

Preparer's signature, Date, Check if self-employed, Preparer's SSN or PTIN, Firm's name, EIN, Phone no.

Third party designee

Do you want to allow another person to discuss this return with the IRS? Yes. Complete the following. No. Designee's name, Phone no., Personal identification number (PIN)

SCHEDULE A (Form 990)

Supplementary Information for Organizations Exempt Under Section 501(c)(3)

(Except Private Foundation) and Section 501(e), 501(f), 501(k), 501(n), or 4947(a)(1) Nonexempt Charitable Trust

MUST be completed by the above organizations and attached to their Form 990

Open to Public Inspection

Department of the Treasury Internal Revenue Service

Name of the organization

Employer identification number

Part I Reason for Public Charity Status (to be completed by all organizations) (See Instructions)

The organization is not a private foundation because it is: (Please check only one applicable box.)

- 1 A church, convention of churches, or association of churches. Section 170(b)(1)(A)(i).
2 A school. Section 170(b)(1)(A)(ii). (Attach Schedule E.)
3 A hospital or a cooperative hospital service organization. Section 170(b)(1)(A)(iii). (Attach Schedule H.)
4 A medical research organization operated in conjunction with a hospital. Section 170(b)(1)(A)(iii). Enter the hospital's name, city, and state:
5 An organization operated for the benefit of a college or university owned or operated by a government unit. Section 170(b)(1)(A)(iv). (Complete the Support Schedule in Part II.)
6 A federal, state, or local government or governmental unit. Section 170(b)(1)(A)(v).
7 An organization that normally receives a substantial part of its support from a governmental unit or from the general public. Section 170(b)(1)(A)(vi). (Complete the Support Schedule in Part II.)
8 A community trust. Section 170(b)(1)(A)(vi). (Complete the Support Schedule in Part II.)
9 An organization that normally receives: (1) more than 33 1/3 % of its support from contributions, membership fees, and gross receipts from activities related to its exempt functions...
10 An organization organized and operated exclusively to test for public safety. Section 509(a)(4). (See instructions.)
11 An organization organized and operated exclusively for the benefit of, to perform the functions of, or to carry out the purposes of one or more publicly supported organizations described in section 509(a)(1) or section 509(a)(2). Section 509(a)(3). Check the box that describes the type of supporting organization.
a Type I b Type II c Type III-Functionally Integrated d Type III-Other
e By checking this box, I certify that the organization is not controlled directly or indirectly by one or more disqualified persons other than foundation managers and other than one or more publicly supported organizations described in section 509(a)(1) or section 509(a)(2).
f Does the organization have a written determination from the IRS that it is a Type I, Type II or Type III supporting organization?
g Since August 17, 2006, has the organization accepted any gift or contribution from any of the following persons?
i a person who directly or indirectly controls, either alone or together with persons described in (ii) and (iii) below, the governing body of the supported organization?
ii a family member of a person described in (i) above?
iii a 35% controlled entity of a person described in (i) or (ii) above?
h Provide the following information about the organizations the organization supports.

Table with 7 columns: (i) Name of Supported Organization, (ii) EIN, (iii) Type of Organization, (iv) Is the organization in (a) listed in your governing document?, (v) Did you notify the organization in (i) of your support?, (vi) Enter the country in which the organization was organized., (vii) Amount of Support.

For Type III-Other organizations, it would be helpful to disclose percentage of income paid out to supported organizations. p. 13

Part II Support Schedule for Organizations described in IRC 170(b)(1)(A)(iv) and 170(b)(1)(A)(vi)
(Complete only if you checked the box on line 5, 7, or 8 of Part I.)

Public Support

Table with 7 columns: Calendar year (or fiscal year beginning in), (a) 20XX, (b) 20XX, (c) 20XX, (d) 20XX, (e) 20XX, (f) Total. Rows include: 1 Gifts, grants, and contributions received; 2 Tax revenues levied for the organization's benefit; 3 The value of services or facilities furnished by a governmental unit; 4 Total; 5 Amounts included on line 1 from each person (other than a governmental unit or publicly supported organization) whose total payments for 2005 through 2009 exceeded 2% of the amount shown on line 12 column (f); 6 Public Support (line 4 minus line 5).

Total Support

Table with 7 columns: Calendar year (or fiscal year beginning in), (a) 20XX, (b) 20XX, (c) 20XX, (d) 20XX, (e) 20XX, (f) Total. Rows include: 7 Amounts from line 4; 8 Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources; 9 Net income from unrelated business activities, whether or not the business is regularly carried on; 10 Gross receipts from activities that are not an unrelated trade or business under section 513; 11 Other income. (Attach a schedule per Instructions. Do not include gain or loss from the sale of capital assets.); 12 Total Support (Add lines 7 through 11); 13 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to the organization's tax-exempt purpose.

Computation of Public Support Percentage

Table with 2 columns: Description, Percentage. Row 14: Public support percentage (line 6 column (f) divided by line 12 column (f)) 14. Row 15: Public support percentage from prior year's Schedule A, Part II, line 14 15.

- 16 Effective date of exemption (month/day/year)
17 First Five Years If the return is for a year that ends within five years after the date entered on line 16, check this box and stop here
18 33 1/3 % Test If the organization did not check the box on line 17, and line 14 or line 15 is 33 1/3 % or more, check this box and stop here. The organization qualifies as a section 509(a)(1) publicly supported organization
19 10% Facts and Circumstances Test If the organization did not check the boxes on line 17 and line 18 and both lines 14 and 15 are 10% or more, and if the organization meets the "facts and circumstances" test, check this box and stop here. See Instructions
20 Private Foundation. If the organization did not check the box on either line 17, 18, or 19, check this box and see instructions

A supplement should be added to accommodate the 10% Facts and Circumstances Test. p. 13

Part III Support Schedule for Organizations Described in IRC 509(a)(2)

(Complete only if you checked the box on line 9 of Part I.) Use the cash method of accounting.

Public Support

Calendar year (or fiscal year beginning in)	(a) 20XX	(b) 20XX	(c) 20XX	(d) 20XX	(e) 20XX	(f) Total
1 Gifts, grants, contributions and membership fees received. (Do not include any "unusual grants.")						
2 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to the organization's tax-exempt purpose						
3 Gross receipts from activities that are not an unrelated trade or business under section 513						
4 Tax revenues levied for the organization's benefit and either paid to or expended on its behalf						
5 The value of services or facilities furnished by a governmental unit to the organization without charge						
6 Total						
7a Amounts included on lines 1, 2, and 3 received from disqualified persons						
7b Amounts included on lines 2 and 3 received from other than a disqualified person that exceed the greater of 1% of line 13 for the year or \$5,000						
7c Total of lines 7a and 7b						
8 Public Support (line 6 minus line 7c)						

Total Support

Calendar year (or fiscal year beginning in)	(a) 20XX	(b) 20XX	(c) 20XX	(d) 20XX	(e) 20XX	(f) Total
9 Amounts from line 6						
10a Gross income from interest, dividends, payments received on securities loans, rents, royalties and income from similar sources						
10b Unrelated business taxable income (less section 511 taxes) from businesses acquired after 6/30/75						
10c Total of lines 10a and 10b						
11 Net income from unrelated business activities not included in line 10b, whether or not the business is regularly carried on						
12 Other income. (Attach a schedule per instructions. Do not include gain or loss from the sale of capital assets.)						
13 Total Support (Add lines 9, 10c, 11 and 12)						

Computation of Public Support Percentage

14a Public support percentage (line 8 column (f) divided by line 13 column (f))	14a	
14b Public support percentage from prior year's Schedule A, Part III, line 14a	14b	

Computation of Investment Income Percentage

15a Investment income percentage (line 10c column (f) divided by line 13 column (f))	15a	
15b Investment income percentage from prior year's Schedule A, Part III, line 15a	15b	

16 Effective date of exemption (month/day/year) ▶

17 First Five Years If the return is for a year that ends within five years after the date entered on line 16, check this box and do not complete the rest of this schedule ▶

18 33 1/3 % Tests - Current Year. If the organization did not check the box on line 17, and line 14a is more than 33 1/3 % and line 15a is less than 33 1/3 %, check this box and stop here. The organization qualifies as a section 509(a)(2) organization ▶

19 33 1/3 % Tests - Prior Year. If the organization did not check the boxes on line 17 and line 18, and line 14b is more than 33 1/3 % and line 15b is less than 33 1/3 %, check this box and stop here. The organization qualifies as a section 509(a)(2) organization ▶

20 Private foundation. If the organization did not check the box on either line 17, 18, or 19, check this box and see instructions ▶

Schedule B
(Form 990, 990-EZ,
or 990-PF)

Department of the Treasury
Internal Revenue Service

Schedule of Contributors

Supplementary Information for
line 1 of Form 990, 990-EZ, and 990-PF (see instructions)

OMB No. 1545-0047

2006

Name of organization	Employer identification number
-----------------------------	---------------------------------------

Organization type (check one):

Filers of:

Section:

Form 990 or 990-EZ

- 501(c)() (enter number) organization
- 4947(a)(1) nonexempt charitable trust **not** treated as a private foundation
- 527 political organization

Form 990-PF

- 501(c)(3) exempt private foundation
- 4947(a)(1) nonexempt charitable trust treated as a private foundation
- 501(c)(3) taxable private foundation

Check if your organization is covered by the **General Rule** or a **Special Rule**. (**Note:** Only a section 501(c)(7), (8), or (10) organization can check boxes for both the General Rule and a Special Rule—see instructions.)

General Rule—

- For organizations filing Form 990, 990-EZ, or 990-PF that received, during the year, \$5,000 or more (in money or property) from any one contributor. (Complete Parts I and II.)

Special Rules—

- For a section 501(c)(3) organization filing Form 990, or Form 990-EZ, that met the 33⅓% support test of the regulations under sections 509(a)(1)/170(b)(1)(A)(vi), and received from any one contributor, during the year, a contribution of the greater of \$5,000 or 2% of the amount on line 1 of these forms. (Complete Parts I and II.)
- For a section 501(c)(7), (8), or (10) organization filing Form 990, or Form 990-EZ, that received from any one contributor, during the year, aggregate contributions or bequests of more than \$1,000 for use *exclusively* for religious, charitable, scientific, literary, or educational purposes, or the prevention of cruelty to children or animals. (Complete Parts I, II, and III.)
- For a section 501(c)(7), (8), or (10) organization filing Form 990, or Form 990-EZ, that received from any one contributor, during the year, some contributions for use *exclusively* for religious, charitable, etc., purposes, but these contributions did not aggregate to more than \$1,000. (If this box is checked, enter here the total contributions that were received during the year for an *exclusively* religious, charitable, etc., purpose. Do not complete any of the Parts unless the **General Rule** applies to this organization because it received nonexclusively religious, charitable, etc., contributions of \$5,000 or more during the year.) ▶ \$ _____

Caution: Organizations that are not covered by the General Rule and/or the Special Rules do not file Schedule B (Form 990, 990-EZ, or 990-PF), but they **must** check the box in the heading of their Form 990, Form 990-EZ, or on line 2 of their Form 990-PF, to certify that they do not meet the filing requirements of Schedule B (Form 990, 990-EZ, or 990-PF).

Name of organization	Employer identification number
-----------------------------	---------------------------------------

Part I Contributors (See Specific Instructions.)

(a) No.	(b) Name, address, and ZIP + 4	(c) Aggregate contributions	(d) Type of contribution
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)
_____	_____ _____ _____	\$ _____	Person <input type="checkbox"/> Payroll <input type="checkbox"/> Noncash <input type="checkbox"/> (Complete Part II if there is a noncash contribution.)

Name of organization	Employer identification number
----------------------	--------------------------------

Part III Noncash Property (See Specific Instructions.)

(a) No. from Part I	(b) Description of noncash property given	(c) FMV (or estimate) (see instructions)	(d) Date received
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____
		\$ _____	____ / ____ / ____

Name of organization	Employer identification number
----------------------	--------------------------------

Part III Exclusively religious, charitable, etc., individual contributions to section 501(c)(7), (8), or (10) organizations aggregating more than \$1,000 for the year. (Complete columns (a) through (e) and the following line entry.)
 For organizations completing Part III, enter the total of exclusively religious, charitable, etc., contributions of \$1,000 or less for the year. (Enter this information once—see instructions.) ▶ \$

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held

(e) Transfer of gift	
Transferee's name, address, and ZIP + 4	Relationship of transferor to transferee

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held

(e) Transfer of gift	
Transferee's name, address, and ZIP + 4	Relationship of transferor to transferee

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held

(e) Transfer of gift	
Transferee's name, address, and ZIP + 4	Relationship of transferor to transferee

(a) No. from Part I	(b) Purpose of gift	(c) Use of gift	(d) Description of how gift is held

(e) Transfer of gift	
Transferee's name, address, and ZIP + 4	Relationship of transferor to transferee

SCHEDULE C (Form 990)

Political Campaign and Lobbying Activities

OMB No. 1545-xxxx

20XX

For Organizations Exempt From Income Tax Under section 501(c) and section 527

Open to Public Inspection

Department of the Treasury Internal Revenue Service

MUST be completed by organizations described below.

If the organization answered "Yes," to Form 990, Part VIII, Line 1. (Political Campaign Activities)

- Section 501(c)(3) organizations: complete Parts I-A and B. Do not complete Part I-C.
• Section 501(c) (other than section 501(c)(3)) organizations: complete Parts I-A and C below. Do not complete Part I-B.
• Section 527 organizations: complete Part I-A only.

We recommend separate schedules for lobbying and for political activities. p. 13

If the organization answered "Yes," to Form 990, Part VIII, Line 2. (Lobbying Activities)

- Section 501(c)(3) organizations that have filed Form 5768 (election under section 501(h)) complete Part II-A. Do not complete Part II-B.
• Section 501(c)(3) organizations that have NOT filed Form 5768 (election under section 501(h)): Complete Part II-B. Do not complete Part II-A.
• Section 501(c) (other than section 501(c)(3)) organizations: complete Part II-B. Do not complete Part II-A.

Section 501(c)(4), (5), or (6) organizations: complete Part III.

Name of organization Employer identification number

Part I-A To be completed by all organizations exempt under section 501(c) and section 527 organizations (See Schedule C instructions for details)

1 Provide a description of the filing organization's direct and indirect political campaign activities:
Political expenditures \$
Volunteer hours

Part I-B To be completed by all organizations exempt under section 501(c)(3). (See Schedule C instructions for details.)

1 Enter the amount of any excise tax incurred under section 4955 \$
2 Enter the amount of any excise tax incurred by organization managers under section 4955 \$
3 If the filing organization incurred in a section 4955 tax, did it file Form 4720 for this year? Yes No
4 Was a correction made? If "Yes," describe

Part I-C To be completed by all organizations exempt under section 501(c), except section 501(c)(3): (See Schedule C instructions for details.)

1 Enter the amount directly expended by the filing organization for section 527 exempt function activities \$
2 Enter the amount of the filing organization's own internal funds contributed to other organizations for section 527 exempt function activities \$
3 Total of direct and indirect exempt function expenditures. Add lines 1 and 2 and enter here and on Form 1120-POL, line 17b \$
4 Did the filing organization file Form 1120-POL for this year? Yes No
5 State the names, addresses and Employer Identification Number (EIN) of all section 527 political organizations to which payments were made. Enter the amount paid and indicate if the amount was paid from the filing organization's own internal funds or were political contributions received and promptly and directly delivered to a separate political organization, such as a separate segregated fund or a political action committee (PAC). If additional space is needed, attach a separate sheet.

Table with 5 columns: (a) Name, (b) Address, (c) EIN, (d) Amount paid from filing organization's own internal funds, (e) Amount of political contributions received and promptly and directly delivered to a separate political organization.

Part II-A To be completed by organizations exempt under section 501(c)(3) that filed Form 5768 (election under section 501(h)). (See Schedule C instructions for details.)

- A** Check if the filing organization belongs to an affiliated group.
B Check if the filing organization checked box A and "limited control" provisions apply.

Limits on Lobbying Expenditures— (The term "expenditures" means amounts paid or incurred.)	(a) Filing Organization's Totals	(b) Affiliated Group Totals
1a Total lobbying expenditures to influence public opinion (grass roots lobbying)		
b Total lobbying expenditures to influence a legislative body (direct lobbying)		
c Total lobbying expenditures (add lines a and b)		
d Other exempt purpose expenditures		
e Total exempt purpose expenditures (add lines c and d)		
f Lobbying nontaxable amount. Enter the amount from the following table in both columns—		
If the amount on line e is—	The lobbying nontaxable amount is—	
Not over \$500,000	20% of the amount on line e	
Over \$500,000 but not over \$1,000,000	\$100,000 plus 15% of the excess over \$500,000	
Over \$1,000,000 but not over \$1,500,000	\$175,000 plus 10% of the excess over \$1,000,000	
Over \$1,500,000 but not over \$17,000,000	\$225,000 plus 5% of the excess over \$1,500,000	
Over \$17,000,000	\$1,000,000	
g Grassroots nontaxable amount (enter 25% of line f)		
h Subtract line g from line a. Enter -0- if line g is more than line a		
i Subtract line f from line c. Enter -0- if line f is more than line c		
j If there is an amount other than zero on either line h or line i, did the organization file Form 4720 reporting section 4911 tax for this year?		<input type="checkbox"/> Yes <input type="checkbox"/> No

4-Year Averaging Period Under Section 501(h)
 (Some organizations that made a section 501(h) election do not have to complete all of the five columns below. See the instructions for lines a through f on page xx of the instructions.)

Lobbying Expenditures During 4-Year Averaging Period					
Calendar year (or fiscal year beginning in)	(a) 20XX	(b) 20XX	(c) 20XX	(d) 20XX	(e) Total
2a Lobbying non-taxable amount					
b Lobbying ceiling amount (150% line 1a, column(e))					
c Total lobbying expenditures					
d Grassroots non-taxable amount					
e Grassroots ceiling amount (150% of line d, column (e))					
f Grassroots lobbying expenditures					

Part II-B To be completed by organizations exempt under section 501(c) **except** those organizations exempt under section 501(c)(3) that filed Form 5768 (election under section 501(h)). (See Schedule C instructions for details.)

	(a)		(b)
	Yes	No	Amount (only for §501(c)(3))
1 During the year, did the filing organization attempt to influence foreign, national, state or local legislation, including any attempt to influence public opinion on a legislative matter or referendum, through the use of:			
a Volunteers			
b Paid staff or management (include compensation in expenses reported on lines c through i)			
c Media advertisements			
d Mailings to members, legislators, or the public			
e Publications, or published or broadcast statements			
f Grants to other organizations for lobbying purposes			
g Direct contact with legislators, their staffs, government officials, or a legislative body			
h Rallies, demonstrations, seminars, conventions, speeches, lectures, or any other means			
i Other activities. If "Yes," describe			
.			
.			
.			
j Total lines c through i			
2a Did the activities in line 1 cause the organization to be not described in section 501(c)(3)?			
b If "Yes," enter the amount of any tax incurred under section 4912			
c If "Yes," enter the amount of any tax incurred by organization managers under section 4912			
d If the filing organization incurred a section 4912 tax, did it file Form 4720 for this year?			

Part III-A To be completed by all organizations exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6). (See Schedule C instructions for details.)

	Yes	No
1 Were substantially all (90% or more) dues received nondeductible by members?		
2 Did the organization make only in-house lobbying expenditures of \$2,000 or less?		
3 Did the organization agree to carryover lobbying and political expenditures from the prior year?		

Part III-B To be completed by all organizations exempt under section 501(c)(4), section 501(c)(5), or section 501(c)(6) if BOTH questions 1 and 2 are answered "No" OR if question 3 is answered "Yes." (See Schedule C instructions for details.)

1 Dues, assessments and similar amounts from members	\$
2 Section 162(e) non-deductible lobbying and political expenditures (<i>do not include amounts of political expenses for which the section 527(f) tax was paid</i>).	
a Current year	\$
b Carryover from last year	\$
c Total	\$
3 Aggregate amount reported in section 6033(e)(1)(A) notices of nondeductible section 162(e) dues.	\$
4 If notices were sent and the amount on line 2c exceeds the amount on line 3, what portion of that amount does the organization agree to carryover to the reasonable estimate of nondeductible lobbying and political expenditure next year?	\$
5 Taxable amount of lobbying and political expenditures (line 2c total minus 3 and 4)	\$

SCHEDULE D (Form 990)

20XX

Open to Public Inspection

Supplemental Financial Statements

Department of the Treasury Internal Revenue Service

Name of the organization

Employer identification number

Part I Investments—Other Securities (Form 990, Part VI, Line 11)
Table with 3 columns: (a) Description of Security or other investment, (b) Book Value, (c) Method of Valuation. Includes a total line for column (b).

Part II Investments—Land, Buildings and Equipment (Form 990, Part VI, Line 12)
Table with 4 columns: (a) Description of investment, (b) Cost or other basis, (c) Depreciation, (d) Book value. Includes a total line for column (d).

Part III Investments—Other (Form 990, Part VI, Line 13)
Table with 3 columns: (a) Description of investment, (b) Book value, (c) Method of valuation. Includes a total line for column (b).

Part IV Investments—Program Related (Form 990, Part VI, Line 14)
Table with 3 columns: (a) Description of investment, (b) Book value, (c) Method of valuation. Includes a total line for column (b).

Part V Program Related—Land, Buildings and Equipment (Form 990, Part VI, Line 15)
Table with 4 columns: (a) Description of asset, (b) Cost or other basis, (c) Depreciation, (d) Book value. Includes a total line for column (d).

Part VI Other Assets—Complete the table for assets not reportable on lines 1–16. (Form 990, Part VI, Line 17)
Table with 2 columns: (a) Description, (b) Book value. Includes a total line for column (b). Contains a red box with text: 'Because other assets are defined in the instructions, it is unclear why reference to intangible assets is needed here. p. 13'.

Part VII Other Liabilities—Complete the table for each liability not reportable on lines 18–25.

(a) Description of Liability	(b) Amount	
Federal Income Taxes		
Column (b) TOTAL: (should equal line 26) . ▶		

Provide the text of the footnote to the organization’s financial statements that reports the organization’s liability for uncertain tax positions under FIN 48.

Part VIII Conservation Easements (Form 990, Part VII, line 2)

- Purpose(s) of conservation easements held by the organization (check all that apply).
 - Preservation of land for public use (e.g., recreation or pleasure)
 - Preservation of an historically important land area
 - Protection of natural habitat
 - Preservation of an historic structure
 - Preservation of open space
- Complete this table if the organization held a qualified conservation contribution in the form of a conservation easement on the last day of the tax year.

	Held at the End of the Year
(a) Total number of easements	
(b) Total acreage subject to easements	
(c) Number of easements on a certified historic structure included in (a)	
(d) Number of easements included in (c) acquired after 8/17/06	
(e) Number of easements that encumber land that is part of or adjacent to a golf course	
(f) Number of easements on land within or adjacent to a residential development	

- Number of conservation easements modified, transferred, released, or terminated by the organization during the taxable year: _____
- Number of states in which the organization held an easement: _____
- Staff hours devoted to monitoring or enforcing easements during the year: _____
- Amount of expenses incurred in monitoring or enforcing easements during the taxable year: _____
- Does the organization have a written policy regarding the periodic monitoring, inspection, and enforcement of the easements it holds? Yes No

Part IX Organizations Maintaining Donor Advised Funds or Other Similar Funds or Accounts (complete if “Yes” to Form 990, Part VII, line 4)

	(a) Donor Advised Funds	(b) Funds and Other accounts
1 Total Number at End of Year		
2 Contributions to		
3 Grants From		
4 Aggregate Value		

- Did the organization inform all donors and donor advisors in writing that the assets held in DAFs are the organization’s property, subject to the organization’s exclusive legal control? Yes No
- Did the organization inform all grantees, donors, and donor advisors in writing that grant funds may be used only for charitable purposes and not for the benefit of the donor or donor advisor? Yes No

Part X Organizations Maintaining Collections of Art, Historical Treasures, and Other Similar Assets (complete if “Yes” to Form 990, Part VII, line 5)

- Did the organization report as revenues on Form 990, Part IV, line 1, any contributions of art, historical treasures, and other similar assets? Yes No
- Did the organization capitalize any such contributions from this year or other years and report such amounts in Form 990, Part VI? Yes No
- Provide the text of the footnote to the organization’s audited financial statements that discusses the organization’s holdings of art, historical treasures and other similar assets.

Part XI Trust/Escrow Accounts (complete if "yes" to Form 990, Part VII, line 3)

1 Is the organization an agent, trustee, custodian or other intermediary for contributions or other assets not included on Form 990, Part VI? If "Yes," explain why and complete the following table. Yes No

Table with columns for Beginning balance, Additions during the year, Distributions during the year, and Ending Balance, and a column for \$ Amount.

Part XII Endowment Funds (Form 990, Part VII, line 6)

Table with columns for Current Year, Prior Year, Two Years Back, Three Years Back, and Four Years Back, and rows for various endowment fund activities.

Part XIII Reconciliation of Net Assets (All references are to Form 990.)

Table with rows for Total Revenue, Total Expenses, Excess or (deficit) for the year, Net assets or fund balances, and other changes in net assets.

Part XIV Reconciliation of Revenue Per Audited Financial Statements with Revenue per Return

Table with multiple rows and columns for reconciling audited financial statements with revenue per return, including sub-rows for various adjustments.

Part XV Reconciliation of Expenses Per Audited Financial Statements with Expense per Return

1	Total expenses and losses per audited financial statements		1	
2	Amounts included on line 1 but not on Form 990, Part 1, line 20:			
a	Donated services and use of facilities	2a		
b	Prior year adjustments reported on Form 990, Part VIII, line 8	2b		
c	Losses reported on Form 990, Part 1, line 20	2c		
d	Other (specify):	2d		

e	Add lines 2a through 2d		2e	
3	Subtract line 2e from line 1		3	
4	Amounts included on Form 990, Part 1, line 20, but not on line 1 :			
a	Investment expenses not included on Form 990, Part IV, line 9b	4a		
b	Other (specify):	4b		

c	Add lines 4a and 4b		4c	
5	Total Expenses (Form 990, Part 1, line 20). Add lines 3 and 4c		5	

SCHEDULE E (Form 990)

Department of the Treasury Internal Revenue Service

Name of the organization

Schools

To be completed by organizations that answer "Yes" to Form 990, Part VII, line 10.

20XX

Open to Public Inspection

Employer identification number

Table with columns YES, NO and rows 1-7 containing questions about racial nondiscrimination policies, record keeping, and financial aid.

Statement of Activities Outside the U.S.

Department of the Treasury Internal Revenue Service

To be completed by organizations that answered "Yes" to any of questions 1a through 1c on Form 990, Part VII.

For foreign worker safety and security reasons, much of Schedule F information should not be open to public inspection. p. 14

Open to Public Inspection

Name of filing organization

PRICEWATERHOUSECOOPERS

Employer identification number

Part I General Information on Accounts and Activities Outside the United States. Complete this section if you answered "Yes" to questions 1a, 1b, or 1c on Form 990, Part VII.

1 Activities per Country

Instructions say "accounts and offices," not "or." p. 14

Table with 6 columns: (a) Country, (b) Number of accounts or offices in the country, (c) Number of employees or agents in country, (d) Activities conducted in country, (e) If activity listed in (d) is a program service, describe specific service(s) in country, (f) Total expenditure in country. Includes a 'Totals' row at the bottom.

The trigger questions on Form 990, Part VII for columns (b) and (c) are Lines 1c and 1b respectively. This juxtaposition is confusing for the reader and the designations on Form 990, Part VII and Schedule F should be made consistent. Moreover, Form 990, Part VII, Line 1c (relating to column (b) above) seeks reporting on a calendar year basis, whereas information for column (c), is reported for the organization's fiscal year. The IRS should make reporting for these two columns consistent. p. 14-15

Instructions do not provide an exception for foreign activity in a country solely for Passive Investment Activities. p. 15

2 For grantmakers. Describe the organization's procedures for selecting grant recipients located outside the United States and monitoring the use of grant funds.

3 Did the organization make any grants directly or indirectly to finance political or lobbying activity outside of the U.S.? Yes No

4a Does the organization describe its activities conducted outside the U.S. in any materials or documents made available to the public? Yes No

b If "Yes," describe how the public has access to the materials

5a Was any individual or organization that received a grant or assistance related to any person with an interest in the organization, such as a donor, officer, director, trustee, creator, highly compensated employee, or member of the selection committee? Yes No

b If "Yes," complete this table. Unprecedented new term should be restated to match "Disqualified Person" definition in IRC §4958. p. 15

Table with 3 columns: (i) Name of person with interest in the organization, (ii) Relationship between person with interest in the organization and recipient, (iii) Amount of grant or type of assistance

Punctuations/Grams
Reporting requirements in Parts II & III are more onerous than private foundation Expenditure Responsibility reporting requirements outlined in Treas. Reg. 53.4945-5(c)(2), p. 14

Schedule F (Form 990) 20XX

Part II Grants and Other Assistance to Organizations or Entities Outside the United States. Complete this table if the organization reported more than \$5,000 on Form 990, Part V, line 3, for any recipient who received more than \$5,000. Check this box if no one recipient received more than \$5,000.

1	(a) Name of organization	(b) IRS code and EIN (if tax-exempt)	(c) City (or Region) and Country	(d) Purpose of grant	(e) Amount of cash grant	(f) Manner of cash disbursement	(g) Amount of non-cash assistance	(h) Description of non-cash assistance	(i) Method of valuation (book, FMV, appraisal, other)

- 2 Enter total number of 501(c)(3) organizations ▶ _____
- 3 Enter total number of other organizations or entities ▶ _____

Part III Grants and Other Assistance to Individuals Outside the United States. Enter information in this table for all grants and assistance reported on line 3 of Form 990, Part V, Statement of Expenses, that were made to individuals located outside the U.S.

(a) Type(s) of assistance	(b) City (or Region) and Country	(c) Number of recipients	(d) Amount of cash grant	(e) Manner of cash disbursement	(f) Amount of non-cash assistance	(g) Description of non-cash assistance	(h) Method of valuation (book, FMV, appraisal, other)

Schedule F (Form 990) 20XX

Punctuations/Grams
To maximize field size parameters established in the Service's current Form 990 E-Filing "Schema," Parts I, II, and III should be presented in a "repeating page" format similar to the current Schedule B - Schedule of Contributors. p. 14

Punctuations/Grams
Before implementing Schedule F, the Service should upgrade its E-Filing capabilities to accept data in fields inclusive of all punctuation marks and other data entries known to cause current E-filing rejections. p. 15

**SCHEDULE G
(Form 990)**
Department of the Treasury
Internal Revenue Service

**Supplemental Information Regarding
Fundraising Activities**
▶ **Must be completed by organizations that report more than \$10,000 on
Form 990, Part IV, line 11a or Part V, line 11e**

OMB No. 1545-0048
20XX
**Open To Public
Inspection**

Name of filing organization

Employer identification number

Part I Fundraising Activities

- 1a** Indicate whether the organization raised funds through any of the following activities. (Check all that apply)
- | | |
|--|---|
| <input type="checkbox"/> mail solicitations | <input type="checkbox"/> grants from governments or organizations |
| <input type="checkbox"/> email solicitations | <input type="checkbox"/> special events (complete Part II below) |
| <input type="checkbox"/> phone solicitations | <input type="checkbox"/> gaming (complete Part III below) |

- b** Did the organization have a written or oral agreement with any individual (including officers, directors, trustees or key employees listed in Form 990, Part III) or organization in connection with these or other fundraising activities? If "Yes," complete the table
- | | | |
|--|--------------------------|--------------------------|
| | YES | NO |
| | <input type="checkbox"/> | <input type="checkbox"/> |

(i) Name of individual or organization	(ii) Activity	(iii) Gross receipts from activity	(iv) Amount paid to (or retained by individual or organization listed in (a))	(v) Amount paid to organization
TOTAL				

- 2** Do any of the organization's officers, directors, or key employees, or members of their families have a family or business relationship with any individual or organization listed above? If "Yes," complete Form 990, Part II, Section B, Line 5f
- | | | |
|--|--------------------------|--------------------------|
| | YES | NO |
| | <input type="checkbox"/> | <input type="checkbox"/> |
- 3** List all jurisdictions in which the organization is authorized to solicit funds:
-
-

Part II Events

		(a) Event #1	(b) Event #2	(c) Other Events	(d) Total Events (sum of (a)-(c))
		(event name)	(event name)	(total number)	
Revenue	1	Gross receipts			
	2	Charitable contributions			
	3	Gross revenue			
Direct Expenses	4	Cash prizes			
	5	Non-cash prizes			
	6	Rent/Facility costs			
	7	Other direct expenses			
	8	<i>Direct expense summary (Sum lines 4-7, column (d))</i>			
9	<i>Net income Summary (Enter the difference between lines 3(d) and 8(d))</i>				

Part III Gaming

		(a) Bingo	(b) Pull tabs/Instant bingo/progressive bingo	(c) Other gaming	(d) Total gaming (sum of (a)-(c))
Revenue	1 Gross Revenue				
	2 Cash Prizes				
Direct Expenses	3 Non-Cash Prizes				
	4 Rent/Facility Costs				
	5 Other Direct Expenses				
6 Volunteer Labor	<input type="checkbox"/> YES %	<input type="checkbox"/> YES %	<input type="checkbox"/> YES %		
	<input type="checkbox"/> NO	<input type="checkbox"/> NO	<input type="checkbox"/> NO		
7	<i>Direct expense summary (Sum lines 2-5, column (d))</i>				
8	<i>Net gaming income summary (Enter the difference between lines 1(d) and 7(d))</i>				

		YES	NO
9a	Did the organization secure proper identification from vendors and prize winners of reportable gaming (gambling) winnings?		
9b	If "No," did the organization comply with backup withholding rules for reportable payments to vendors and prize winners of reportable gaming (gambling) winnings?		
9c	Enter number of Forms W-2G filed for gaming activities _____		
10a	Did the organization provide any workers with awards, bonuses or gifts (other than non-cash items of nominal value)?		
10b	If "Yes," did the organization provide the workers with a Form W-2 or Form 1099?		
11	Enter the state(s) in which the organization operates gaming activities: _____		
11a	Is the organization licensed to operate gaming activities in each of these states?		
11b	If "No," Explain:		
12a	Were any of the organization's gaming licenses revoked, suspended or terminated during the tax year?		
12b	If "Yes," Explain:		
13	Does the organization operate gaming activities with nonmembers?		
14	Is the organization a grantor, beneficiary or trustee of a trust or a member of a partnership or other entity formed to administer charitable gaming?		
15	Indicate the percentage of gaming activity operated in:		
15a	The organization's facility:		%
15b	An outside facility:		%

		YES	NO
16	Provide the name and address of the person who prepares the organization's gaming/special events books and records: Name: Address:		
17a	Does the organization have a contract with a third party from whom the organization receives gaming revenue?		
b	If "Yes," enter the amount of gaming revenue received by the organization \$ _____ and the amount of gaming revenue retained by the third party \$ _____.		
18	Gaming Manager Information Name: Gaming Manager Compensation \$ Description of Services Provided: <input type="checkbox"/> Director/Officer <input type="checkbox"/> Employee <input type="checkbox"/> Independent Contractor		
19	Mandatory Distributions		
a	Is the organization required under state law to make charitable distributions from the gaming proceeds to retain the state gaming license?		
b	Enter the amount of distributions required under state law distributed to other exempt organizations or spent in the organization's own exempt activities during the tax year. \$ _____		

Princeton House Copiers

In the Schedule G "Who Must File" section, second reference to the Core Form 990 should be "Form 990, Part V, Line 11e," not "Line 11." p. 15

Link to beginning of all Schedule H comments. p. 16

Requirement to file Schedule H should be changed to include only organizations "licensed" by a state to operate as a hospital. p. 16

SCHEDULE H (Form 990)

Hospitals

Open to Public Inspection

Department of the Treasury Internal Revenue Service

To be completed by organizations that answer "yes" to Form 990, Part VII, Line 9.

Name of filing organization

Community benefit reporting for an integrated health system should be allowed on a combined rather than a separate basis. p. 16

Employer identification number

Part I Community Benefit Report

Table with 6 columns: (a) Number of activities or programs, (b) Persons served, (c) Total community benefit expense, (d) Direct offsetting revenue, (e) Net community benefit expense, (f) Percent of total expense. Rows include Charity Care (1-4) and Other Benefits (5-11).

Schedule H should also include a line for Bad Debt Expense to allow comparison of costs associated with Uncompensated Care. p. 16

Because organizations will need to implement new record keeping practices, a two year transition period should be allowed. p. 17

Definition of "Research" should be modified to include the value of scientific research in the public interest. p. 16

12a Does the organization prepare an annual community benefit report? Yes No

b If yes, does the organization make it available to the public? Yes No

13a Does the organization have a charity care policy? Yes No

b If yes, describe. Include in the description whether the organization (a) bases eligibility for free or discounted care on federal poverty guidelines, income or asset levels, (b) applies such policy uniformly to all of its facilities or differently based on socio-economic factors, local law, and other community factors, and (c) imposes aggregate budget caps or other limitations that may result in persons otherwise eligible under the policy to not receive free or discounted care.

Series of horizontal dashed lines for providing a detailed description of the charity care policy.

Part II should be eliminated or information requested should be reduced for public disclosure purposes. p. 17

Part II Billing and Collections ~~PROCEED WITH CAUTION~~

Section A—Billing Information

	(a) Description	(b) Medicare	(c) Medicaid	(d) Other Government Programs	(e) Insured	(f) Uninsured	(g) Total
1	Gross charges						
2	Discounts						
3	Net expected						
4	Fees collected						

5 Explain how the organization calculates bad debt expense.

.....

.....

.....

Section B—Collection Practices

6a Does the organization have a written debt collection policy? Yes No

b If yes, describe.

.....

.....

.....

Part III should be eliminated or disclosure be reduced to not include entities where the organization maintains a 50% or less ownership interest. p. 17

Part III Management Companies and Joint Ventures

	(a) Name of entity	(b) Description of primary activity of entity	(c) Organization's profit % or stock ownership %	(d) Officers, directors, trustees, or key employee's profit % or stock ownership %	(e) Physician's profit % or stock ownership %
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					

Part IV General Information

1 Describe how the organization assesses the health care needs of the communities it serves.

.....

.....

.....

2 Describe how the organization's patient intake process informs and educates patients about their eligibility for assistance under federal, state, or local government programs or under the organization's charity care policy, if applicable.

.....

.....

.....

.....

Part IV General Information *(continued)*

3 Describe the organization's emergency room policies and procedures, including hours of operation, if applicable.

.....

.....

.....

4 Provide any other information important to describing how the organization's hospital facilities further its exempt purpose.

.....

.....

.....

.....

Part V Facility Information

(A) Provide the name and address of each of the organization's facilities, and type of service provided at each.	(B) Describe the activities and programs conducted at each facility
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	
Name _____ Address _____ City & State _____ Type _____	

Draft as of
06/14/2007



SCHEDULE 1
 (Form 990)

**Supplemental Information on Grants and Other Assistance to Organizations,
 Governments and Individuals in the U.S.**

OMB No. 1545-0047
20XX

**Open to Public
 Inspection**

Department of the Treasury
 Internal Revenue Service

To be completed by organizations that reported more than \$5,000 on Form 990, Part V, lines 1 and 2.

Name of filing organization _____ Employer identification number _____

Part I General Information on Grants and Assistance

- 1** Does the organization maintain records to substantiate the amount of the grants or assistance, the grantees' eligibility for the grants or assistance, and the selection criteria used to award the grants or assistance? Yes No
- 2a** Was any individual or organization that received a grant or assistance related to any person with an interest in the organization, such as a donor, officer, director, trustee, creator, highly compensated employee, or member of the selection committee? Yes No
- b** If "Yes," complete this table.
- | | (i) Name of person with interest in the organization | (ii) Relationship | (iii) Amount of grant |
|--|--|-------------------|-----------------------|
| | | | |
| | | | |
| | | | |
| | | | |

Part II Grants and Other Assistance to Governments and Organizations in the United States. Complete the following if the organization reported more than \$5,000 on Form 990, Part V, line 1 for any recipient that received more than \$5,000. Check this box if no one recipient received more than \$5,000.

	(a) Name and address of organization or government	(b) EIN (if tax exempt)	(c) IRC Code section if applicable	(d) Amount of cash grant	(e) Amount of non-cash grant	(f) Method of valuation (book, FMV, appraisal, other)	(g) Description of non-cash grant	(h) Purpose of grant
2	Enter total number of 501(c)(3) and government organizations							
3	Enter total number of other organizations							
Part III	Grants and Other Assistance to Individuals in the United States. Enter information in this table for grants and assistance reported on line 2, Form 990, Part V. <input type="checkbox"/>							
	(a) Type of grant or assistance	(b) Number of recipients	(c) Amount of cash grant	(d) Amount of non-cash grant	(e) Method of valuation (book, FMV, appraisal, other)	(f) Description of non-cash grant		
<p>For U.S. citizens/residents temporarily traveling or studying abroad, further guidance should be provided on whether individual grant information should be reported on Schedule F or Schedule I. p. 18</p>								
<p>Column (c) should be expanded to identify if grantee is a 501(c), government, or for-profit entity. p. 17</p>								
<p>Instructions do not clarify whether an organization can make a determination of value or if appraisal must be obtained from independent third party. p. 17</p>								

SCHEDULE J (Form 990)

Supplemental Compensation Information

OMB No. 1545-7000 20XX Open to Public Inspection

Department of the Treasury Internal Revenue Service

Employer identification number

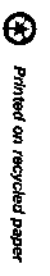
For certain Officers, Directors, Trustees, Key Employees, and Highly Compensated Employees To be completed by organizations that answered "Yes" to any of lines 6 through 9 on Form 990, Part II-Section B

1 Officers, Directors, Trustees, Key Employees, and Highly Compensated Employees

Report compensation from the organization and other organizations described in the instructions. Do not list any individuals that are not listed on Form 990, Part III.

Table with columns: (A) Name, (B) Breakdown of W-2 or 1099-MISC Compensation (Base, Bonus & Incentive, Severance or Change of Control, Other), (C) Nonqualified Deferred Compensation, (D) Nontaxable Benefits, (E) Nontaxable Expense Reimbursements, (F) Total of Columns (B)(i)-(E), (G) Supplemental Nonqualified Retirement Plan, (H) Equity-Based Compensation. Includes a red box with instructions: 'Column (D) should not include de minimis fringe benefits as the IRC does not require they be tracked and (E) should be removed esexpense reimbursements are permitted under accountable plan standards. p. 18'

- 2 Did the organization implement and follow a written policy regarding payment or reimbursement of travel and entertainment expenses incurred by officers, directors, trustees, or other employees?
3 Did the organization pay or reimburse for first-class travel, club dues, or use of personal residence?
4 For persons listed in Form 990, Part II-Section A, did the organization pay or accrue any compensation determined in whole or in part by the revenues of: a the organization? b any related organization?
5 For persons listed in Form 990, Part II-Section A, did the organization pay or accrue any compensation determined in whole or in part by the net earnings of: a the organization? b any related organization?
6 For persons listed in Form 990, Part II-Section A, did the organization provide any non-fixed payments not described in lines 4 and 5?
7 (501(c)(3) or (4) organizations only) Were any amounts reported in Form 990, Part II paid or accrued pursuant to a contract that was subject to the initial contract exception described in Regulations section 53.4958-4(a)(3)?



Printed on recycled paper

SCHEDULE K (Form 990)

Supplemental Information on Tax Exempt Bonds

To be completed by organizations that answered "Yes" to Form 990, Part VII, lines 6a-6d.

Department of the Treasury Internal Revenue Service

Name of filing organization

OMB No. 1545-XXXX 20XX

Open to Public Inspection

Employer identification number

Part I Bond Issues

	(a) Issuer Name	(b) Issuer EIN	(c) OUSIP #	(d) Date Issued	(e) Date Form 8038 Filed	(f) Description of Purpose	(g) Date Placed in Service	(h) On Behalf of Issuer (Y/N)
A								
B								
C								
D								
E								

Relevance of Form 8038 filing date is unclear. p. 18

Columns (f) & (g) do not accommodate reporting for bonds issued for more than one purpose. Schedule K reporting should be modified to allow for multiple purposes. p. 18

Part II Proceeds

	A	B	C	D	E
1 Issue Price					
2 Amount in Reserve Fund					
3 Principal amount Unspent (excluding reserves)					
4 Principal amount Outstanding					
5 Principal amount Defeased					
6 Principal amount Retired					
7 Issuance Costs from proceeds					
8 Working Capital Expenditures					
9 Was the bond issued to current refund a prior tax-exempt bond issue? (Y/N)					
10 Was the bond issued to advance refund a prior tax-exempt bond issue? (Y/N)					
11 Did the financing qualify under a temporary period exception? (Y/N)					

Reference to Form 8038 would be helpful. p. 19

Part III Private Use

	A	B	C	D	E
1 Was the organization a partner in a partnership, or a member of an LLC, which owned property financed by tax-exempt bonds? (Y/N)					
2a Did the organization enter into a management contract for the financed property? (Y/N)					
2b If "Yes," did the contract meet the safe harbor under Rev. Proc. 97-13? (Y/N)			Part IV Compensation of third parties		
3a Did the organization enter into a research agreement for the financed property? (Y/N)					
3b If "Yes," did the contract meet the safe harbor under Rev. Proc. 97-14? (Y/N)			Rev. Proc. 97-14 has been superseded by Rev. Proc. 2007-47 p. 19		
4 If "Yes" on lines 2a or 3a, what was the highest percentage of the project that was subject to either a management contract or research agreement?			Question does not address private use other than non-safe harbor contracts. If safe-harbor requirements are met, organization should not have to track the amount of private used. p. 19		
5a Did any entity, other than a 501(c)(3) organization or state or local government, use the property during the reporting period for use not described in 2a or 3a above? (Y/N)			Part IV Compensation of third parties		
5b If "Yes," indicate the highest percentage of use.					

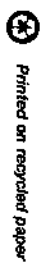
Part IV Compensation of third parties

Name	Role	Total paid	Amount paid from bond proceeds? (Y/N)	Selected through formal process (Y/N)

Part V Compensation of Officers

In lieu of asking whether an organization meets safe harbor requirements for certain agreements, Schedule K should ask if an organization quantifies the amount of private use of bond proceeds and ask for an average percentage of private use during life of the bond.

Alternatively, organizations could be required to file Form 8038-T every five years and questions on Schedule K could be moved to Form 8038-T, p. 19



Supplemental Information on Loans

SCHEDULE L (Form 990)

Department of the Treasury Internal Revenue Service

To be completed by organizations that enter an amount on lines 5, 6 or 23 of Form 990, Part VI

OMB No. 1545-0047 20XX Open to Public Inspection

Name of filing organization

Employer identification number

Part I Loans to Officers, Directors, Trustees, Key Employees, Highly Compensated Employees, and Disqualified Persons

List the details of each loan, advance, or receivable outstanding as of the end of the organization's tax year, owed to the organization by each current or former officer, director, trustee, key employee, highly compensated employee, and disqualified person.

Table with 10 columns: (a) Name of debtor, (b) Original principal amount, (c) Balance due, (d) Date of loan, (e) Maturity date, (f) Interest rate, (g) Security provided by debtor, (h) Purpose of loan, (i) Written agreement Y/N

Part II Loans from Officers, Directors, Trustees, Key Employees, Highly Compensated Employees, and Disqualified Persons

List the details of each loan, advance, or receivable outstanding as of the end of the organization's tax year, owed by the organization to each current or former officer, director, trustee, key employee, highly compensated employee, and disqualified person.

Table with 10 columns: (a) Name of creditor, (b) Original principal amount, (c) Balance due, (d) Date of loan, (e) Maturity date, (f) Interest rate, (g) Security provided by debtor, (h) Purpose of loan, (i) Written agreement Y/N

For Paperwork Reduction Act Notice, see the Instructions for Form 990.

Cat. No. 50056P

Schedule L (Form 990) 20XX

Non-Cash Contributions

**SCHEDULE M
(Form 990)**

Department of the Treasury
Internal Revenue Service

To be completed by organizations that report more than \$5,000 of non-cash contributions on Form 990, Part IV, line 1g

20XX

**Open To Public
Inspection**

Name of the organization

Employer identification number

Part I Types of Property

	(a) Quantity	(b) Revenues reported on Form 990, Part IV, line 1g	(c) Method of valuation	(d) Amount reported on Form 990, Part VI
1 Art—Fractional interest				
2 Art—Historical treasures				
3 Art—Other				
4 Books and publications				
5 Clothing				
6 Household goods				
7 Cars and other vehicles				
8 Boats and planes				
9 Intellectual property				
10 Securities—Publicly traded				
11 Securities—Closely held stock				
12 Securities—Partnership or trust interests				
13 Securities—Miscellaneous				
14 Qualified conservation contribution (historic structures)				
15 Qualified conservation contribution (other)				
16 Real estate—Residential				
17 Real estate—Commercial				
18 Real estate—Other				
19 Collectibles				
20 Food inventory				
21 Drugs and medical supplies				
22 Taxidermy				
23 Other (describe				
24 Other (describe				
25 Other (describe				
26 Other (describe				

Should add a box to indicate if gift was acknowledged on Form 8283, Section B, Part IV. p. 20

PRECEDENT HOUSE COPIES

- 27 Number of Forms 8283 received by the organization during the tax year for contributions for which the organization completed Part IV, Donee Acknowledgement . . . 27
- 28a For items reported on line 7 or 8 above, did the organization file Form 1098-C? . . . Yes No
- b If "Yes," how many?
- 29 During the year, did the organization receive by contribution any property that it must hold for at least three years from the date of the initial contribution? Typo . . . Yes No

Schedule M requires an organization to place a value on all donated items whereas Form 8283 does not require written appraisals for seven exceptions. Recommend removing the requirement for a valuation on Schedule M.

However, if valuation requirement remains, then recommend an organization be permitted to mark or include a statement to the effect that, "The organization is not a qualified appraiser and therefore the valuations provided for items not appraised by qualified appraisers were determined to the best of the organization's ability solely for purposes of satisfying IRS reporting requirements." p. 20

**SCHEDULE N
 (Form 990)**

Department of the Treasury
 Internal Revenue Service

Liquidation, Termination, Dissolution or Significant Disposition of Assets

To be completed by organizations that check box on Form 990, Part I, Line 11
 ▶ Attach certified copies of any articles of dissolution, resolutions or plans.

OMB No. 1545-0047

20XX

**Open to Public
 Inspection**

Name of the organization

Employer identification number

Complete Part I if the organization ceased its operations and any remaining activities are for the purpose of dissolving, paying debts, or distributing any remaining assets.
 Complete Part II if the organization had a disposition of more than 25% of its assets.

Part I Liquidation, Termination or Dissolution (Attach additional pages if additional space is needed.)

1 (a) Description of asset(s) distributed or transactional expenses paid	(b) Date of distribution	(c) Fair market value of asset(s) distributed or amount of transactional expenses.	(d) Method of determining FMV for asset(s) distributed or transactional expenses.	(e) EIN of recipient (if tax-exempt)	(f) Name and address of recipient	(g) IRC Code section of recipient(s) (if tax-exempt)

- 2 Did or will any officer, director, trustee, or key employee of the organization:
- a Become a director or trustee of a successor or transferee organization? Yes No
 - b Become an employee of, or independent contractor for, a successor or transferee organization? Yes No
 - c Become a direct or indirect owner of a successor or transferee organization? Yes No
 - d Receive, or become entitled to, compensation or other similar payments as a result of the organization's liquidation, termination, or dissolution? Yes No
 - e If the organization answered "Yes" to any of the questions in this line, provide the name of the person involved and explain

- Note:** If the organization distributed all of its assets during the tax year, then Form 990, Part VI, column (B) should equal -0-
- 3 Did the organization distribute its assets in accordance with its governing instruments? Yes No
 - 4 Did the organization request or receive a determination letter from EO Determinations that the organization's exempt status was terminated? (If "Yes," attach copy.) Yes No
 - 5a Is the organization required to notify the attorney general or other appropriate state official of its intent to dissolve? Yes No
 - b If "Yes," did the organization provide such notice? Yes No
 - 6 Did the organization discharge or pay all liabilities in accordance with state laws? Yes No
 - 7a Did the organization have any tax-exempt bonds outstanding during the year? Yes No
 - b Did the organization discharge or release tax-exempt bond liabilities in accordance with the Internal Revenue Code and state laws? Yes No
 - c If "Yes," describe how the organization defused or otherwise settled these liabilities. If "No," explain

Part II Sale, Exchange, Disposition or Other Transfer of more than 25% of the Organization's Assets (Attach additional pages if additional space is needed.)

8	(a) Description of asset(s) distributed or transactional expenses paid	(b) Date of distribution	(c) Fair market value of asset(s) distributed or amount of transactional expenses	(d) Method of determining FMV for asset(s) distributed or transactional expenses	(e) EIN of recipient (if tax-exempt)	(f) Name and address of recipient	(g) IRC Code section of recipient(s) (if tax-exempt or type entity)

- 9 Did or will any officer, director, trustee, or key employee of the organization:
- a Become a director or trustee of a successor or transferee organization? Yes No
 - b Become an employee of, or independent contractor for, a successor or transferee organization? Yes No
 - c Become a direct or indirect owner of a successor or transferee organization? Yes No
 - d Receive, or become entitled to, compensation or other similar payments as a result of the organization's significant disposition of assets? Yes No
 - e If the organization answered "Yes" to any of the questions in this line, provide the name of the person involved and explain

Practitioner's Corner

Given the nature of the supporting documentation requested to be attached with Part I (i.e. Articles of Dissolution, IRS Determination Letter, etc.) it is unclear whether Part I is really necessary if such supporting documentation is provided.

For E-filing purposes, the IRS should consider allowing such supporting documents to be attached as Adobe .pdf files with an organization's E-filing submission. p. 20

**SCHEDULE R
(Form 990)**

Related Organizations

To be completed by organizations that answered "Yes" to Form 990, Part VII, lines 7a or 7b

OMB No. 1545-XXXX
20XX
Open to Public Inspection

Department of the Treasury
Internal Revenue Service

Employer identification number

Part I Identification of Disregarded Entities

(A) Name and address of disregarded entity	(B) EIN	(C) Nature of activities	(D) State or Foreign Country	(E) Total revenue (\$)	(F) End-of-year assets (\$)	(G) Direct Controlling Entity

Part II Identification of Related Tax-Exempt Organizations

(A) Name and address of related organization	(B) EIN	(C) Nature of activities	(D) State or Foreign Country	(E) Exempt Code section	(F) Public charity status (if 501(c)(3))	(G) Direct Controlling Entity

Part III Identification of Related Organizations Taxable as a Partnership

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)
Name and address of related organization	Primary business activity, product or service	State or Foreign Country	Direct Controlling Entity	Predominant income (related, investment, unrelated)	Total Income (\$)	End-of-year assets (\$)	Disproportionate allocations? (Y/N)	Code V-UBI amount on Box 20 of K-1 (\$)	General or Managing Partner? (Y/N)

Part IV Identification of Related Organizations Taxable as a Corporation or Trust

(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Name and address of related organization	Primary business activity, product or service	State or Foreign Country	Direct Controlling Entity	Type of entity (C corp, S corp, or trust)	Total Income (\$)	End-of-year assets (\$)	Percentage ownership

Part V Transactions with Related Organizations and Noncharitable Exempt Organizations

- 1** During the tax year did the organization engage in any of the following transactions with a related organization listed in Parts II-IV:
- a** Gift, grant, or capital contribution to other organization
 - b** Gift, grant, or capital contribution from other organization
 - c** Loans or loan guarantees to or for other organization
 - d** Loans or loan guarantees by other organization

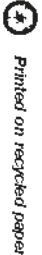
For clarity, the two transactions in the instructions that are to be disregarded should be incorporated into Schedule R, Part V. p. 21

- e** Sale of assets to other organization
- f** Purchase of assets from other organization
- g** Exchange of assets
- h** Lease of facilities, equipment, or other assets to other organization
- i** Lease of facilities, equipment, or other assets from other organization
- j** Performance of services or membership or fundraising solicitations for other organization
- k** Performance of services or membership or fundraising solicitations by other organization
- l** Sharing of facilities, equipment, mailing lists, other assets, or employees
- m** Reimbursement paid to other organization for expenses
- n** Reimbursement paid by other organization for expenses
- o** Other transfer of cash or property to other organization
- p** Other transfer of cash or property from other organization

"Definition of Control" section of instructions contains two definitions that exceed the disclosure requirements of IRC §6033(h) because they may not meet the definition of "Control" as defined in IRC §512(b)(13). Recommend removing the two categories of organizations from the definition of "Control." p. 21

2 If the answer to any of the above is "Yes," complete the following table:

	(A) Name of other organization	(B) Transaction type (A-P)	(C) Amount involved (\$)	(D) Description of transaction and of property involved (if any)	(E) Interest, annuity, royalty, or rent from controlled entity? (Y/N)	Yes	No
(1)							
(2)							
(3)							
(4)							
(5)							
(6)							



Printed on recycled paper