Private Foundation Returns, 1986 and 1987

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

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

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

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

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		Percentage	change	
item	Curr doll		Cons dolla	
	1985 to 1986	1986 to 1987	1985 to 1986	1986 to 1987
	(1)	(2)	(3)	(4)
Fair market value of total assets	+ 16.6% + 22.0	+1.0% -14.5	+ 13.6% + 18.9	-2.1% -17.2
from sales of assets Contributions received . Total expenses Grants paid	+36.4 +31.0 +14.3 +18.3	-20.4 -26.1 +9.6 +9.1	+32.9 +27.6 +11.4 +15.3	-22.8 -28.4 +6.3 +5.8
Excess of revenue over expenses	+28.2	-31.6	+24.9	-33.7

¹The GNP implicit price deflator was used to adjust for inflation.

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

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

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

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

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

OVERVIEW AND EXPLANATION OF PRIVATE FOUNDATIONS

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

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

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

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

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

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

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

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

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

IMPACT OF STOCK MARKET CONDITIONS AND 1986 TAX REFORM ACT

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

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

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

Figure B
Top Ten Domestic Foundations Ranked by Size of Fair Market Value of Total Assets, 1986 and 1987¹

[Money amounts are in millions of dollars]

Name	Location	Total assets 1987	Total assets 1986	Total revenue 1987	Total revenue 1986
Ford Foundation	New York	\$5,087	\$5,543	\$ 339	\$ 692
J. Paul Getty Trust ²	California	3,982	4,141	295	420
W. K. Kellogg Foundation Trust ³	New York	2,812	3,471	112	151
John D. and Catherine T. MacArthur Foundation	Illinois	2,436	2,426	202	217
Robert Wood Johnson Foundation	New Jersey	1,910	1,804	194	178
Lilly Endowment, Incorporated	Indiana	1,792	1,730	72	54
Rockefeller Foundation	New York	1,667	1,606	291	379
Andrew W. Mellon Foundation	New York	1,522	1,521	181	140
Pew Memorial Trust	Pennsylvania	1,437	1,477	178	167
Kresge Foundation Total	Michigan	1.046 \$23,692	1.047 \$24,765	141 \$2,005	<u>329</u> \$2,727

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

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

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

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

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

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

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

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

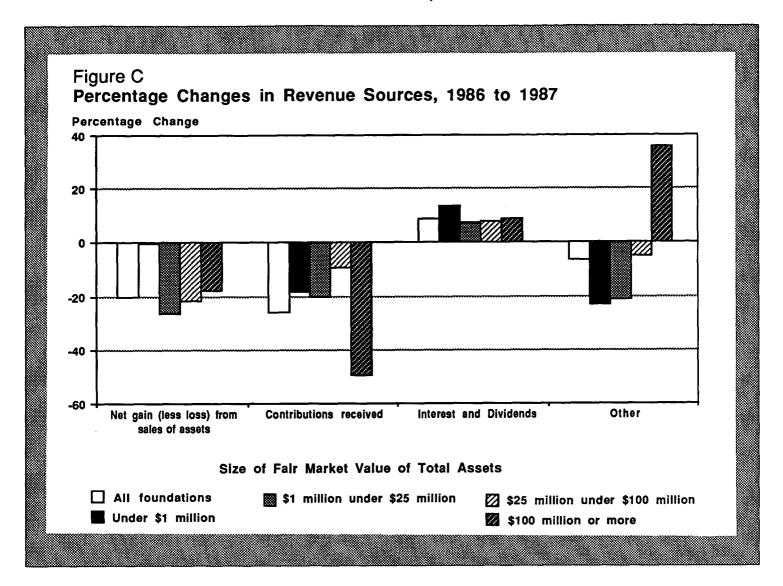
Donors also may have been encouraged to make gifts of stock to foundations before 1987, because of the TRA provision relating to contributions of appreciated property. Because donations of appreciated stock to nonoperating foundations were allowed to be deducted at fair market value, the excess of this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

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

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

COMPONENTS OF REVENUE

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



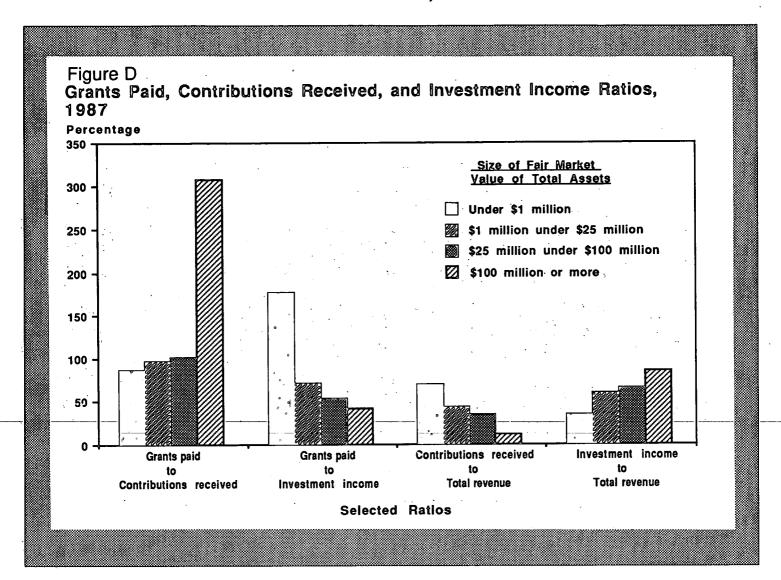
As can be seen from Figure D, the portions of revenue comprised of both "contributions received" and "investment income" vary as the asset size increases [18]. Contributions received was a more significant part of the revenue of smaller foundations, while the opposite was true for larger foundations.

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

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

COMPONENTS OF ASSETS AND INVESTMENTS

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

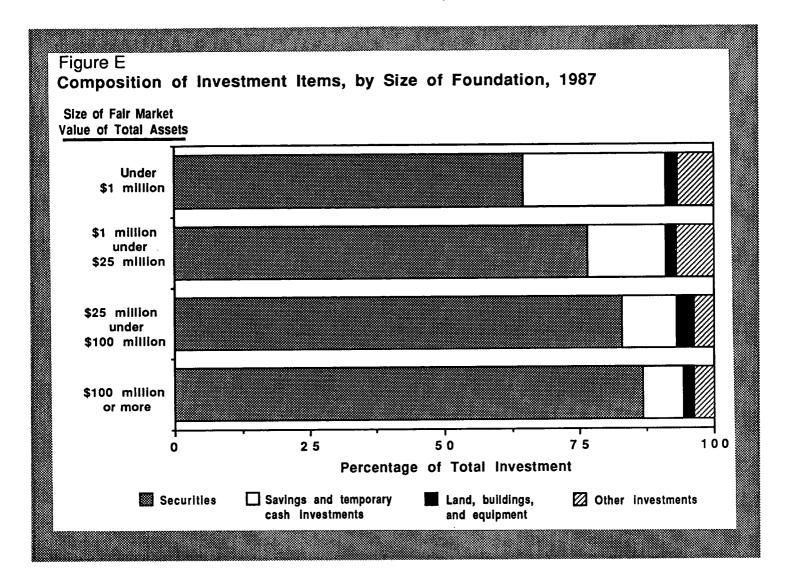


changes compare dramatically with the large real gains from 1985 to 1986. Between these 2 years, total investments in securities increased by 13.0 percent, total investments by 13.5 percent, and total assets by 13.6 percent.

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

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

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



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

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

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

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

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

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

THE PAYOUT REQUIREMENT

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

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

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

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

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

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

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

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

THE PAYOUT RATE

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

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

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

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

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

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

n.a. - not available

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

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

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

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

INVESTING BEHAVIOR

Rate of Total Return

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

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

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

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

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

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

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

Income Yield

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

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

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

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

ASSETS, DISTRIBUTIONS AND DECISION-MAKING

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

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

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

n.a. - not available

¹The GNP implicit price deflator was used to adjust for inflation.

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

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

n.a. - Not available

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

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

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

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

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

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

¹The GNP implicit price deflator was used to adjust for inflation.

²The calculation for 1974 divides net investment income by book value of investment assets. For all other years net investment income is divided by the fair market value of investment assets. The use of fair market values, unavailable for 1974, would have lowered the rates from those calculated and most likely affected the differences between the small and large foundations.

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

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

SUMMARY

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

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

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

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

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

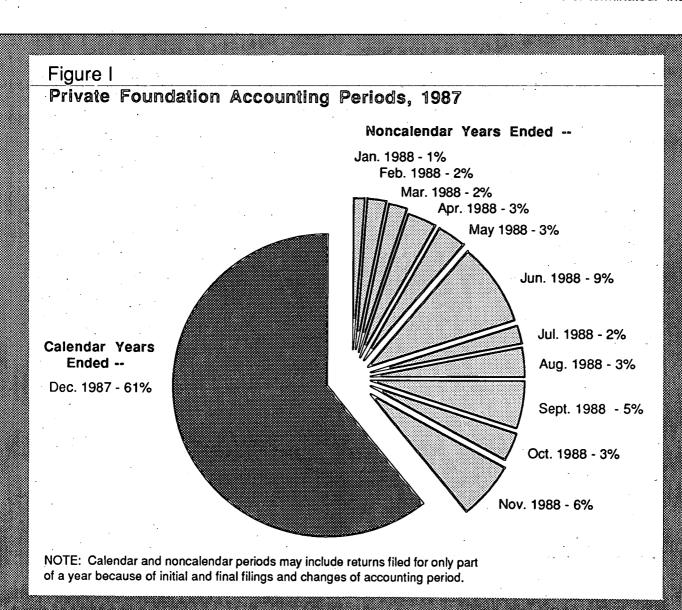
DATA SOURCES AND LIMITATIONS

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

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

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

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



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

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

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

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

	ated number of re f book value of to \$100,000 under \$1,000,000		Approximate coefficient of variation
reported	\$1,000,000	\$10,000,000	
(1)	(2)	(3)	(4)
	Return y	ear 1986	
15,400 10,800 5,200 2,800 1,700 800 300	12,400 9,100 4,700 2,600 1,600 800 300	5,000 4,200 2,600 1,600 1,000 500 200	.010 .025 .050 .075 .100 .150
	Return ye	ear 1987	- 42
14,700 9,200 3,900 2,000 1,200 600 200	12,100 7,400 3,100 1,600 900 400 200	4,800 2,700 1,100 500 300 100	.010 .025 .050 .075 .100 .150

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

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

EXPLANATION OF SELECTED TERMS

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

NOTES AND REFERENCES

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

- Hilgert, Cecelia, and Mahler, Susan J., "Nonprofit Charitable Organizations, 1985," *Statistics of Income Bulletin*, Fall 1989, Volume 9, Number 2, pp. 53-65.
- [9] Programs termed "charitable" refer to any tax-exempt activities which are charitable, educational, scientific, social, literary, or religious in nature.
- [10] Generally, the assets test was met if 65 percent or more of the foundation's assets were used directly for the active conduct of charitable activities. The endowment test was met if the foundation normally made distributions for the active conduct of charitable activities in an amount not less than twothirds of its minimum investment return. The support test was met if substantially all of its support (other than gross investment income) was normally received from the public or five or more qualifying exempt organizations; no more than 25 percent of its support (other than gross investment income) was normally received from any one such qualifying exempt organization; and no more than half of its support was normally received from gross investment income.
- [11] Some of the foundations classified as "nonoperating" for 1986 and 1987 were "failed public charities," organizations that were originally classified as public charities but that could no longer qualify for that favored status because they failed to maintain the required minimum of support from public sources. Most often, the reclassified nonoperating foundations continued to operate like public charities, conducting programs or providing direct services, as opposed to making grants to accomplish a charitable purpose. Perhaps many of these organizations could have qualified as operating foundations, but had not requested such status from the Internal Revenue Service.
- [12] For a discussion of how tax law changes made under the Tax Reform Act of 1986 affected individuals for 1987, see Hostetter, Susan and Bates, Jeffrey, "Individual Income Tax Returns, Preliminary Data, 1987," Statistics of Income Bulletin, Spring 1989, Volume 3, Number 4, pp. 5-26.
- [13] For example, a fully deductible \$100 donation made for 1986 by an individual whose income was taxed at a rate of 50 percent would actually cost only \$50 after the donation was claimed as a deduction from income on the individual's tax return (\$50 in tax was saved by reducing taxable income by \$100). The

- same \$100 donation made by the individual for 1987, with a newly reduced income tax rate of 38.5 percent, would actually cost \$61.50 (only \$38.50 in tax would be saved on \$100 deducted from taxable income).
- [14] Statistics of Income--1986, Individual Income Tax Returns, U.S. Department of the Treasury, Internal Revenue Service, 1989.
- [15] Statistics of Income—1987, Individual Income Tax Returns, U.S. Department of the Treasury, Internal Revenue Service, 1990.
- [16] Statistics of Income--1986, Corporation Source Book, U.S. Department of the Treasury, Internal Revenue Service, 1989.
- [17] Statistics of Income—1987, Corporation Income Tax Returns, U.S. Department of the Treasury, Internal Revenue Service, 1990.
- [18] The amounts of "contributions received" and "total revenue" used to calculate the ratios in Figure D were reported in Part I, lines 1 and 12, respectively, column (a) of the Form 990-PF. "Investment income" was reported in Part I, line 12, column (b) and is the gross amount, before deductions for related expenses. "Grants paid" was reported in Part I, line 25, column (d).
- [19] This represents the method used after the 1969 Act and up until 1982, when ERTA became effective.
- [20] Salamon, Lester M. and Voytek, Kenneth P., Managing Foundation Assets: An Analysis of Foundation Investment and Payout Procedures and Performance, The Council on Foundations, 1989.
- [21] The Foundation Directory, 11th edition, Loren Renz, editor, The Foundation Center, New York, 1987, p. xx.
- [22] To calculate the payout rate, the amount of (adjusted) qualifying distributions was divided by the amount of the monthly average of net investment (or noncharitable-use) assets. This payout formula adjusts qualifying distributions with slight additions and subtractions that are made to the required "distributable amount" on the Form 990-PF, Return of Private Foundation. The formula also adjusts for excess distributions made in the past and applied to the requirement of the current filing year.

- [23] Data were available only for the years 1974, 1982, 1983, 1985, 1986, and 1987.
- [24] The volatile stock market no doubt affected the asset value of a foundation differently depending on its accounting period. For instance, since the payout rate depends on a monthly average of assets, those foundations using a calendar year accounting period for 1987 realized 9 relatively solid months prior to the October decline. The payout rate calculation, then, would account for both the positive and negative months.
- [25] The rate of total return formula is the same as that used by Salamon and Voytek in a study on foundation assets for the years 1979-1983. See: Salamon and Voytek, *Ibid.*, p. 32. The formula is as follows:

RATE OF TOTAL RETURN =

((Ending Fair Market Value of Assets

- Beginning Fair Market Value of Assets*)
- (Contributions Received by the Foundation)
- +-(Grants Paid by the Foundation-
- + Operating and Administrative Expenses
- + Excise Tax Paid on Net Investment Income))

DIVIDED BY

(Beginning Fair Market Value of Assets

+ (Contributions Received / 2))

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

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

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

Table 1A.—Number of Private Foundations and Selected Financial Data, by Type of Foundation and Size of Fair Market Value of Total Assets, 1986

[All figures are estimates based on a sample—	money amoun	ts are in thouse Total re			penses	Excess of re	evenue (less		f revenue,	Disbursemen	ts for exempt	Contribution		Grant adm	
fair market value of total assets	returns	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)	(15)
ALL FOUNDATIONS					,,,	,,,			· · · · · · · · · · · · · · · · · · ·		, ,	` '	` '		
Total	35,172	34,183	20,031,228	33,008	8,274,395	34,312	11,756,831	23,904	12,449,741	30,082	7,109,100	27,615	6,205,413	19,268	391,187
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	1,215 13,771 13,167 5,730 713 270 155 151	1,024 13,069 13,086 5,717 712 269 155 151	60,308 378,791 1,482,104 4,040,568 2,213,381 1,831,520 1,812,129 8,214,429	1,122 12,398 12,568 5,638 709 267 155 151	135,911 406,572 710,055 1,732,485 940,386 738,318 741,231 2,869,438	951 13,313 13,059 5,702 712 269 155 151	-75,603 -29,782 772,049 2,308,081 1,272,995 1,093,202 1,070,898 5,344,991	*216 8,046 9,625 4,846 658 240 137	*240 122,537 876,005 2,448,441 1,326,699 1,157,320 1,097,883 5,420,615	772 10,791 11,770 5,493 698 258 151 150	133,053 388,381 632,782 1,477,917 857,281 645,640 597,795 2,376,251	680 9,409 11,080 5,266 644 248 142 145	130,406 360,220 515,407 1,315,190 734,107 564,412 504,615 2,081,057	528 6,500 7,178 3,993 573 231 130 139	1,448 14,151 39,275 56,722 49,427 34,432 38,221 157,511
Nonoperating foundations															
Total	32,405	31,528	18,048,034	30,536	7,362,313	31,602	10,685,720	22,061	11,364,142	28,109	6,550,601	26,408	6,115,906	18,485	312,487
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$50,000,000 \$100,000,000 under \$100,000,000	1,108 12,474 12,344 5,350 609 245 138	948 11,841 12,278 5,336 608 244 138 137	56,380 357,242 1,323,881 3,531,323 2,003,154 1,673,356 1,658,877 7,443,821	1,016 11,335 11,805 5,258 605 242 138 137	132,131 387,913 583,482 1,430,595 827,437 658,108 643,483 2,699,167	859 12,043 12,251 5,321 608 244 138 137	-75,751 -30,671 740,398 2,100,727 1,175,717 1,015,250 1,015,394 4,744,654	*151 7,277 9,051 4,566 556 218 120 122	*73 114,299 842,281 2,238,464 1,228,637 1,077,730 1,042,379 4,820,279	730 9,848 11,221 5,198 602 238 137 137	131,386 372,421 524,963 1,364,383 770,845 599,731 542,963 2,243,909	666 8,760 10,764 5,111 596 237 137	130,028 349,084 497,655 1,292,940 727,472 560,431 502,584 2,055,711	512 6,184 6,867 3,908 530 223 128 133	1,350 13,541 18,128 46,901 35,562 28,918 28,088 139,999
Operating foundations															
Total	2,767	2,654	1,983,194	2,472	912,082	2,710	1,071,112	1,843	1,085,600	1,973	558,499	1,207	89,506	783	78,700
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	*108 1,298 823 380 104 25 17	*78 1,228 808 380 104 25 17	*3,928 19,549 158,223 509,243 210,227 158,164 153,252 770,608	*106 1,063 763 380 104 25 17	*3,780 18,659 126,573 301,890 112,949 80,212 97,748 170,272	*92 1,270 808 380 104 25 17	*148 889 31,650 207,353 97,278 77,952 55,504 600,337	*64 769 575 280 102 22 17	*167 8,238 33,724 209,978 98,062 79,590 55,504 600,337	*42 942 549 297 96 20 14	*1,667 15,960 107,820 113,534 86,436 45,910 54,832 132,341	*14 849 317 155 48 11 5	*377 11,138 17,752 22,249 6,634 3,981 2,031 25,348	*14 316 309 *85 43 8 2	*98 610 21,147 *9,821 13,865 5,514 10,133 17,512
GRANTMAKING FOUNDATIONS													ļ		li .
Total	27,615	27,480	18,440,749	27,564	7,587,209	27,288	10,853,539	18,498	11,529,838	27,615	6,773,486	27,615	6,205,413	17,619	333,063
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$50,000,000 \$100,000,000 under \$100,000,000	680 9,409 11,080 5,266 644 248 142 145	652 9,303 11,080 5,266 644 248 142 145	55,678 287,861 1,073,304 3,525,833 2,031,094 1,636,009 1,693,768 8,137,103	680 9,409 11,080 5,216 644 248 142 145	131,453 370,609 582,620 1,478,853 848,498 674,799 665,760 2,834,618	574 9,297 10,987 5,252 644 248 142 145	-75,775 -82,748 490,684 2,047,080 1,182,596 961,210 1,028,008 5,302,488	5,074 7,873 4,480 594 221 125 130	66,813 590,059 2,184,131 1,233,572 1,022,468 1,054,885 5,378,110	680 9,409 11,080 5,268 644 248 142 145	131,014 367,437 544,084 1,414,587 794,071 616,152 561,297 2,344,844	680 9,409 11,080 5,266 644 248 142 145	130,406 360,220 515,407 1,315,190 734,107 564,412 504,615 2,081,057	462 5,510 6,680 3,922 551 227 129 139	593 6,759 24,363 47,830 36,284 29,469 30,453 157,511
Grantmaking-nonoperating foundations															
Total	26,408	26,288	17,311,477	26,358	7,248,178	26,096	10,063,296	17,816	10,729,727	26,408	6,512,904	26,408	6,115,906	17,108	298,782
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	668 8,760 10,764 5,111 598 237 137	638 8,668 10,764 5,111 596 237 137	55,203 281,362 1,027,309 3,337,547 1,954,452 1,555,386 1,656,399 7,443,821	666 8,760 10,764 5,061 596 237 137	130,977 358,112 552,809 1,403,409 818,677 644,129 640,898 2,699,167	574 8,648 10,670 5,098 596 237 137	-75,775 -76,750 474,499 1,934,137 1,135,778 911,257 1,015,500 4,744,654	4,800 7,646 4,369 546 212 120	65,653 572,533 2,070,761 1,186,751 971,371 1,042,379 4,820,279	668 8,760 10,764 5,111 598 237 137	130,539 355,853 515,329 1,359,086 767,255 597,971 542,963 2,243,909	666 8,760 10,764 5,111 596 237 137	130,028 349,084 497,655 1,292,940 727,472 560,431 502,584 2,055,711	448 5,305 6,482 3,885 525 222 128 133	496 6,834 15,409 46,532 32,709 28,915 28,088 139,999
Grantmaking-operating foundations	i :														•
Total	1,207	1,193	1,129,272	1,207	339,031	1,193	790,241	682	800,111	1,207	260,582	1,207	89,506	511	34,281
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	*14 649 317 155 48 11 5	*14 635 317 155 48 11 5	*475 6,499 45,996 188,386 76,642 80,623 37,367 693,283	*14 649 317 155 48 11 5	*475 12,497 29,810 75,444 29,822 30,671 24,861 135,451	849 317 155 48 11 5	-5,998 16,185 112,942 46,820 49,953 12,506 557,832	274 227 *111 48 9 5	960 17,526 •113,370 48,820 51,097 12,506 557,832	*14 649 317 155 48 11 5	*475 11,584 28,755 55,501 26,816 18,181 18,334 100,935	*14 649 317 155 48 11 5	*377 11,136 17,752 22,249 6,634 3,981 2,031 25,346	*14 204 198 *57 26 5 1	*98 125 8,954 *1,098 3,578 554 2,365 17,512

[All figures are estimates based on a sample - r	noney amoun	ts are in thouse	inds of dollars)					1						1	
Size of	Net investm	ent income	Net gain (from sale				n net investme			Total (assets value)	Investments (book			assets ket value)
fair market value of total assets	Number of		Number of		Total	Domestic or Number of	ganizations	Foreign org	ganizations	Number of	<u> </u>	Number of	· ·	Number of	Ι
	returns	Amount	returns	Amount		returns	Amount	returns	Amount	returns	Amount	returns	Amount	returns	Amount
	(16).	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
ALL FOUNDATIONS															
Total	29,452	12,326,253	12,411	6,994,128	195,823	27,981	194,840	70	983	34,073	87,191,337	20,237	64,184,892	33,958	113,175,809
Zero or unreported	526 9,775	11,833 55,947	*199 1,979	*7,184 14,760	122 894 7 224	9,166 11,986	122 892 7 193	*14 *14	*2 *3	*129 13,771 13,153	*131 437,268 4,164,836	4,759 9,288	160,341 2,041,805	13,771 13,167	451,268 4,657,968
\$10,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	12,388 5,498	419,333 2,098,261	4,973 4,122	110,649 939,321	7,224 34,166 21,585 16,396	5,214 648	7,192 34,125 21,554 16,358	*30	*32 *41 30	5,730 713	14,840,939 8,977,299	9,288 4,963 674 255 151	9,407,579 6,303,287	5,730 713	17,889,686
\$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000	699 264 153	1,297,745	609 241 144	680,325 571,793	16,396	241 141	16,358 20,687	ē	30 38 35	270 155	7,460,288 8,460,707	255 151	5,507,692 6,395,801	270 155	9,289,741
\$50,000,000 under \$100,000,000 \$100,000,000 or more	149	1,232,231 6,178,086	143	674,379 3,995,716	20,722 94,715	138	93,910	3	804	151	42,849,868	147	34,368,387	151	58,843,840
Nonoperating foundations				1								40.000		24.007	101 101 000
Total	27,513	11,355,686	11,854	6,426,153	192,271	26,914	191,288	70	983	31,348	77,367,154	19,068	58,790,743	31,297	101,101,390
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000	526 9,001	11,833 50,558	*199 1,937	*7,184 14,724	122 817	448 8,643	122 815	*14	*2 *32 *41	12,474 12,330	395,958 3,870,162	4,499 8,806	151,406 1,981,491	12,474	408,747 4,340,885
\$100,000 under \$1,000,000	11,687 5,187	404,528 2,006,495	4,837 4,830 3,884 533 222 128 130	108,297 868,509	7,081 33,803	11,613 5,116	7,049 33,762 20,417	*30 2 8	*41	5 350	13,680,955 7,865,335	4 680	8,970,287 5,836,940	12,344 5,350 609 245	16,414,876 9,734,308
\$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	5,187 598 242	1,182,447 960,878	222	632,015 531,159	20,447 16,187	595 234 134	16,149 20,214	6	30 38 35 804	609 245 138 137	6,737,227 7,521,008	576 237 134 135	5,163,540 5,862,653	245 138	8,424,576 9,624,954
\$50,000,000 under \$100,000,000 \$100,000,000 or more	137 135	1,144,209 5,594,738	130	632,366 3,631,900	20,249 93,564	132	92,760	з	804	137	37,296,469	135	30,814,425	137	52,153,033
Operating foundations												Ì			
Total		970,567	557	567,974	3,552	1,067	3,552	-	•	2,725	9,824,182	1,169	5,404,149	2,661	12,074,430
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000	775	5,388	*42	*36	78	523	78		:	1,298	41,310	260	8,935 60,314	1,298	42,521 317,082
\$100,000 under \$1,000,000	701 311	14,805 91,766	*153 238 76 19	*2,353 70,812	142 *362	372 *99 53 7	142 *362	:	:	823 380	294,675 1,159,984	283	437,292 466,347	380	1,474,810
\$25,000,000 under \$30,000,000	101 22 16	115,298 71,939	76 19	48,310 40,634	*362 1,138 209	53	1,138 209	:	:	1,298 823 380 104 25	1,111,984 723,081 939,699	260 482 283 98 18	344,152 533,147	1,298 823 380 104 25	865,165 1,197,083
\$50,000,000 under \$100,000,000	16	88,022 583,348	16 13	42,014 383,817	473 1,150	6	473 1,150	:	:	14	5,553,399	12	3,553,962	14	6,690,807
GRANTMÄKING FOUNDATIONS												1			107.100.000
Total	25,372	11,978,822	11,551	6,831,753	192,665	24,670	191,734	66	931	26,935	82,414,792	17,678	62,035,195	26,935	107,100,963
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000	476 7,724	11,833 52,540	*199 1,845	*7,184 14,696	122 829	448 7,425 10,677	122 827 6,579	*14	*2	9,409	333,511	3,976	131,550	9,409	345,322 3,955,355
\$100,000 under \$1,000,000	10,858 5,145 640	383,884 2,022,730	4,523 3,912	97,087 889,075	6,612 33,584	4,988	33,543 20,894	*14	*32 *41 30 21	11,066 5,266 644 248	3,513,889 13,558,712	4,639	1,799,405 8,861,074 5,935,997	5,266	16,353,592
\$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	840 245	1,226,472 994,591	573 229	666,318 550,863	20,924 16,165	4,988 627 234 137	16,144	3	21	248	8,161,816 6,834,668 7,793,624	7,929 4,639 616 239 138 142	5,188,163 6,005,829	11,080 5,266 644 248 142	8,546,906 9,912,121
\$50,000,000 under \$100,000,000	141 143	1,165,548 6,121,224	133 137	639,915 3,966,615	20,459 93,969	137	20,459 93,165	3	804	142 145	42,218,547	142	34,113,177	145	57,692,914
Grantmaking-nonoperating foundations	[-					
Total		11,297,530	11,255	6,404,119	191,103	24,150	190,172	66	931	25,742	75,855,312	17,092	58,067,414	25,742	99,471,964
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000 000 under \$25,000,000 \$25,000,000 under \$25,000,000	476 7,274	11,833 47,540	*199 1,817	*7,184 14,644	122 759	7,129	122 757	*14	*2	*14 8,760	311,592	3,780	123,959	8,760	322,186 3,855,777
\$100,000 under \$1,000,000	10,556 5,018	377,215 1,992,270	4,418 3,814	96,578 864,083	6,541 33,519	10,527 4,960	6,509 33,478	*14	*32 *41 30 21	10,750 5,111	3,419,124 13,182,725	4,511	1,767,329 8,754,987	10,764 5,111	15,881,558 9,540,780
\$10,000,000 under \$25,000,000	593 235 138	1,176,801 953,799	529 220	630,802 526,562	20,347 16,037	10,527 4,960 590 230 134	20,317 16,015	2 3	30	596 237	7,682,223 6,489,200	231	5,776,402 5,012,156	5,111 596 237 137	8,147,637
\$50,000,000 under \$100,000,000 \$100,000,000 or more	. 136 135	1,143,333 5,594,738	128 130	632,366 3,631,900	20,214 93,564	134 132	20,214 92,760	j š	804	137 137	7,473,953 37,296,469		5,818,156 30,814,425	137	9,570,992 52,153,033
Grantmaking-operating foundations					,										
Total	949	681,293	296	427,634	1,561	520	1,561		•	1,193	6,559,480	586	3,967,782	1,193	7,629,018
Zero or unreported	450	5,000	*28	*51	71	297	71] :	:	, 649	21,919	*195	*7,591	649	23,136
\$100,000 under \$1,000,000	302 *127	6,669 *30,460	*105 *99 44	*509 *24,993	*71 *65	*150 *28	*71 *65	:	:	155	94,765 375,988	*127	32,076 *106,087	155	99,578 472,034 783,003
\$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000	47	49,671 40,792	44	35,516 24,300	577 128	37	577 128	:	:	11	479,593 345,468	8	159,596 176,007	11	753,993 399,268 341,129
\$50,000,000 under \$100,000,000	. 5	22,215 526,486	5 7	7,550 334,715	245 405	3 2	245 405		:	5 8	319,871 4,922,078	5 7	187,873 3,298,752	8	5,539,880

Footnotes at end of table.

Table 1A.—Number of Private Foundations and Selected Financial Data, by Type of Foundation and Size of Fair Market Value of Total Assets, 1986—Continued

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

Size of fair market value of total assets		in securities ket value)	Net	worth	Minimum ret	Investment um	Distributat	ele amount	Qualfiying o	distributions		s grant ve expenses		ted income 1986	Excess di carryove	stributions r to 1987
Tail (Tital Ref. Value of total assets	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)	(41)	(42)	(43)	(44)	(45)	(46)
ALL FOUNDATIONS	<u> </u> 		}	:								ļ				
Total	20,081	87,014,561	34,072	83,501,039	31,568	5,022,891	29,390	4,578,013	30,787	7,746,165	4,039	68,032	7,085	1,157,489	23,063	8,754,835
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	4,652 9,240 4,963 672 255 151	169,817 2,490,138 12,007,407 8,161,106 7,082,033 8,392,341 48,711,720	*157 13,743 13,153 5,730 712 270 155 151	*118 410,307 3,990,084 14,338,414 8,612,147 7,105,215 8,168,200 40,876,556	582 11,312 12,797 5,605 707 262 153 150	5,233 23,388 194,152 794,046 489,029 408,537 477,231 2,631,278	568 10,403 12,037 5,267 605 239 136 135	5,103 21,888 180,792 756,704 438,755 372,279 458,870 2,343,644	800 11,079 12,089 5,547 705 262 154 151	132,875 390,436 640,592 1,668,129 911,303 652,398 687,671 2,662,761	*171 1,854 1,381 480 99 37 10 8	*281 2,708 12,481 19,251 19,715 9,442 1,312 2,842	2,033 3,039 1,614 164 112 56 67	1,911 26,842 150,457 77,686 110,756 105,656 684,201	674 8,918 9,087 3,667 441 127 80 69	215,998 1,089,604 1,327,005 2,434,645 1,381,389 680,301 612,183 1,013,712
Nonoperating foundations)	ļ											
Total	18,912	80,792,365	31,347	74,503,576	29,477	4,644,252	29,390	4,578,013	28,612	6,766,426	3,706	45,000	7,085	1,157,489	23,063	8,754,835
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$25,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	4,393 8,758 4,680 574 237 134 135	159,887 2,422,417 11,438,705 7,578,484 6,686,873 7,761,228 44,768,773	*92 12,448 12,330 5,350 608 245 138 137	*28 369,740 3,760,959 13,262,271 7,613,831 6,515,290 7,317,667 35,663,782	568 10,459 12,067 5,267 605 239 136 136	5,224 21,906 184,830 752,924 449,413 380,256 439,526 2,410,173	568 10,403 12,037 5,267 605 239 136 135	5,103 21,888 180,792 756,704 438,755 372,279 458,870 2,343,644	758 10,137 11,407 5,198 603 237 137	131,119 374,668 527,705 1,381,116 770,600 588,033 574,250 2,418,935	*171 1,758 1,214 437 79 34 10	*281 2,376 3,053 18,030 10,457 6,648 1,312 2,842	2,033 3,039 1,614 164 112 56 67	1,911 26,842 150,457 77,666 110,756 105,656 684,201	674 8,918 9,087 3,667 441 127 80 69	215,996 1,089,604 1,327,005 2,434,645 1,381,389 680,301 612,183 1,013,712
Operating foundations				Į.												
Total	1,169	6,222,197	2,725	8,997,464	2,091	378,640	N/A	N/A	2,175	979,739	331	23,032	N/A	N/A	N/A	N/A
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	260 482 283 98 18 17	9,930 67,721 570,702 582,622 415,160 631,116 3,944,947	*64 1,298 823 380 104 25 17	*90 40,567 229,125 1,076,133 998,317 589,925 850,532 5,212,764	*14 853 730 339 102 23 17 14	*8 1,481 9,322 41,121 39,616 28,280 37,705 221,105	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A	*42 942 682 351 102 25 17	*1,756 15,768 112,867 287,013 140,702 64,365 113,421 243,827	*98 *167 *43 20 3	*332 *9,429 *1,221 9,257 2,794	N/A N/A N/A N/A N/A N/A N/A	NA NA NA NA NA NA NA	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A
GRANTMAKING FOUNDATIONS																
Total	17,564	84,305,448	26,934	79,391,407	26,277	4,873,857	25,256	4,549,569	27,571	7,121,889	3,647	49,187	4,957	1,144,034	20,980	8,567,629
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000	3,897 7,896 4,639 614 239 138 142	140,592 2,218,725 11,342,739 7,697,191 6,697,991 7,912,446 48,295,764	*42 9,381 11,066 5,266 643 248 142 145	315,901 3,390,619 13,299,561 7,986,256 6,593,017 7,579,093 40,246,949	490 8,491 10,869 5,253 644 245 141	5,222 21,080 175,983 761,808 484,915 390,032 450,934 2,604,083	490 7,999 10,568 5,097 596 235 136 135	5,101 20,109 168,998 749,777 435,456 367,615 458,870 2,343,644	966 9,409 11,080 5,238 644 247 142 145	130,718 368,549 541,703 1,429,852 795,180 607,459 637,544 2,610,884	*171 1,650 1,210 480 82 36 10	*281 2,390 5,389 19,251 10,944 8,776 1,312 2,842	822 2,203 1,543 157 109 56 67	1,062 22,294 147,320 76,054 107,447 105,656 684,201	582 7,628 8,468 3,568 438 126 80 69	205,669 996,125 1,294,507 2,424,170 1,343,958 677,306 612,183 1,013,712
Grantmaking-nonoperating foundations														ł		ļ
Total	16,979	80,001,630	25,741	73,309,472	25,300	4,614,832	25,256	4,549,569	26,379	6,719,486	3,453	44,741	4,957	1,144,034	20,960	8,567,629
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	4,511 568 231 133	132,003 2,184,682 11,211,955 7,509,128 6,487,267 7,709,821 44,766,773	*42 8,732 10,750 5,111 595 237 137 137	*11 294,545 3,325,305 12,944,238 7,497,337 6,313,632 7,270,613 35,663,792	490 8,027 10,583 5,097 596 235 136 136	5,222 20,100 172,625 745,713 446,014 375,459 439,526 2,410,173	490 7,999 10,568 5,097 596 235 136 135	5,101 20,109 168,998 749,777 435,456 367,615 458,870 2,343,644	652 8,760 10,764 5,097 596 236 137	130,243 356,969 512,569 1,373,270 768,976 586,274 574,250 2,418,935	*171 1,594 1,122 437 78 34 10 8	*281 2,266 2,925 18,030 10,436 6,648 1,312 2,842	822 2,203 1,543 157 109 56 67	1,062 22,294 147,320 78,054 107,447 105,656 684,201	582 7,628 8,468 3,568 438 126 80 69	205,669 996,125 1,294,507 2,424,170 1,343,958 677,306 612,183 1,013,712
Grantmaking-operating foundations												1				İ
Total	596	4,303,818	1,193	6,061,935	977	259,025	N/A	N/A	1,192	402,403	194	4,446	N/A	N/A	N/A	N/A
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$10,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$50,000,000 \$100,000,000 or more	*195 197 *127 *127 48 8 5	*8,589 34,043 *130,784 188,062 210,724 202,625 3,528,991	949 317 155 48 11 5	21,356 65,313 355,323 468,920 279,386 308,480 4,583,157	464 287 155 48 10 5	980 3,358 15,894 18,901 14,573 11,408 193,910	**************************************	N/A N/A N/A N/A N/A N/A N/A	*14 649 317 *140 48 11 5	*475 11,580 29,134 *58,581 28,204 21,185 63,294 191,949	*56 *89 *43 4 2	*125 *2,465 *1,221 508 128	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	N/A N/A N/A N/A N/A N/A N/A

N/A - not applicable.

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

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

Table 1B.—Number of Private Foundations and Selected Financial Data, by Type of Foundation and Size of Fair Market Value of Total Assets, 1987

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

Size of	Number of	Total re	evenue	Total ex	penses	Excess of re loss) over		Excess of to		Disbursemen purp		Contribution grants		Grant adm expe	
fair market value of total assets	returns	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(1)	(2)	(3)	(4)	(5)	(6)	.(7)	(8)	(9)	· (10)	(11)	(12)	(13)	(14)	(15)
ALL FOUNDATIONS															
Total	35,907	35,158	17,116,794	34,747	9,072,066	35,063	8,044,727	21,938	9,180,495	32,496	7,801,815	30,045	6,770,100	18,841	381,014
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 or more	858 14,190 13,671 5,882 712 284 157	688 13,651 13,635 5,878 712 284 157	16,506 292,969 1,254,630 3,369,230 1,911,881 1,696,361 1,624,120 6,951,097	798 13,334 13,467 5,843 711 284 157 154	46,362 285,254 830,777 2,010,489 1,018,447 845,823 759,035 3,275,880	660 13,679 13,544 5,878 712 280 157	-29,857 7,716 423,853 1,358,741 893,434 850,538 885,086 3,675,217	*66 7,337 9,160 4,323 568 237 121 125	*498 62,793 629,413 1,724,554 1,019,462 963,773 952,091 3,827,911	619 11,879 13,004 5,705 702 280 154 153	43,400 257,006 767,618 1,688,065 900,864 717,417 651,386 2,778,059	563 10,595 12,384 5,306 648 257 145	41,987 226,293 677,248 1,450,072 772,497 597,668 543,653 2,460,682	260 6,259 7,366 3,920 538 233 126 141	867 10,078 31,991 65,154 39,555 34,977 33,187 165,205
Nonoperating foundations						·									
Total	32,746	32,095	15,572,480	31,790	8,268,733	31,995	7,303,746	20,041	8,375,114	29,979	7,172,998	28,598	6,686,128	18,310	359,650
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	816 12,652 12,814 5,296 628 255 140 146	646 12,197 12,789 5,296 626 255 140 146	15,568 261,439 1,156,134 2,955,242 1,684,733 1,514,207 1,459,186 6,525,971	757 11,990 12,621 5,256 625 255 140 146	45,336 256,897 750,333 1,775,918 901,866 730,497 670,479 3,137,408	632 12,211 12,698 5,291 626 251 140 146	-29,768 4,542 405,801 1,179,323 782,867 783,710 788,707 3,388,563	*68 6,532 8,613 3,894 500 213 106 117	*498 55,637 594,832 1,530,765 897,991 882,832 871,301 3,541,257	577 10,774 12,269 5,200 622 254 138 145	42,383 237,176 699,435 1,507,705 806,961 638,312 581,802 2,659,223	536 9,863 11,927 5,128 615 247 137	41,095 218,587 659,527 1,437,360 760,847 595,015 539,770 2,433,926	246 6,038 7,156 3,852 528 229 123 139	766 9,761 29,228 53,948 38,248 33,667 30,421 163,612
Operating foundations															,
Total	3,161	3,063	1,544,314	2,957	803,333	3,067	740,981	1,897	805,381	2,516	628,818	1,447	83,972	531	21,364
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$25,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	*41 1,537 856 586 29 17	*41 1,454 845 582 86 29 17	*937 31,530 98,496 413,988 227,148 182,154 164,935 425,126	*41 1,344 845 586 86 29 17	*1,026 28,357 80,444 234,570 116,581 115,326 88,556 138,473	*28 1,468 845 586 86 29 17	*-88 3,173 18,051 179,418 110,567 66,828 76,378 286,654	805 548 429 68 24 15	7,156 34,581 193,789 121,471 80,941 80,790 286,654	*41 1,105 735 505 80 26 16	*1,017 19,830 68,183 178,361 93,903 79,105 69,584 118,836	*28 732 457 177 33 10 8 3	*892 7,705 17,721 12,712 11,650 2,653 3,883 26,755	*14 221 210 68 10 4 3	*100 317 2,764 11,206 1,307 1,309 2,767 1,593
GRANTMAKING FOUNDATIONS			<u>.</u>		.*			•					,		
Total	1	29,861	15,804,924	30,032	8,465,018	29,715	7,339,905	18,283	8,428,232	30,045	7,388,212	30,045	6,770,100	18,018	351,670
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	. 145	481 10,498 12,384 5,301 648 257 145 148	13,715 234,879 1,075,714 2,853,418 1,715,813 1,553,467 1,502,935 6,854,884	563 10,581 12,384 5,308 648 257 145 148	43,487 245,419 760,231 1,798,150 930,829 750,382 705,801 3,230,721	494 10,429 12,293 5,301 648 257 145 148	-29,772 -10,440 315,482 1,055,268 784,984 803,085 797,134 3,624,162	*25 5,248 8,168 3,885 513 218 110 119	*395 40,477 507,977 1,411,734 904,465 902,744 883,583 3,776,856	563 10,595 12,384 5,306 648 257 145 148	42,297 236,472 716,022 1,543,964 837,741 651,492 616,817 2,743,408	563 10,595 12,384 5,306 648 257 145 148	41,987 226,293 677,248 1,450,072 772,497 597,668 543,653 2,480,682	246 5,706 7,158 3,876 535 233 125 141	309 6,943 23,057 54,040 36,709 34,977 30,431 165,205
Grantmaking-nonoperating foundations															
Total	28,598	28,419	15,131,096	28,598	8,161,671	28,296	6,969,427	17,427	8,027,434	28,598	7,134,929	28,598	6,686,128	17,573	343,789
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	. 9,863 11,927 5,128 615 247	453 9,768 11,927 5,128 615 247 137	12,779 224,336 1,032,826 2,771,809 1,642,308 1,487,638 1,441,841 6,517,560	536 9,863 11,927 5,128 615 247 137 145	42,485 234,416 728,701 1,748,060 892,813 725,411 661,716 3,130,068	481 9,711 11,836 5,124 615 247 137 145	-29,706 -10,080 304,125 1,025,749 749,495 762,227 780,125 3,387,492	*25 4,875 7,853 3,753 492 210 104 116	*395 38,552 487,644 1,375,917 861,744 860,834 862,163 3,540,186	536 9,863 11,927 5,128 615 247 137	41,305 226,940 687,330 1,500,078 802,994 635,881 581,197 2,659,223	536 9,863 11,927 5,128 615 247 137 145	41,095 218,587 659,527 1,437,360 760,847 595,015 539,770 2,433,926	232 5,513 6,991 3,822 525 229 123 139	209 6,695 22,167 51,617 35,402 33,667 30,421 163,612
Grantmaking-operating foundations	1	1	,						[1	1
Total	1,447	1,443	673,826	1,433	303,348	1,420	370,478	856	400,798	1,447	253,283	1,447	83,972	445	7,882
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 or more	. 732 . 457 . 177	*28 732 457 173 33 10 8	*936 10,642 42,887 81,609 73,505 65,829 61,093 337,323	*28 718 457 177 33 10 8	*1,001 11,003 31,530 52,090 38,015 24,971 44,084 100,653	*14 718 457 177 33 10 8	*-66 -360 11,357 29,519 35,490 40,858 17,009 236,670	373 313 131 21 8 6	1,925 20,334 35,818 42,721 41,910 21,420 236,670	*28 732 457 177 33 10 8	*992 9,532 28,692 43,886 34,747 15,631 35,620 84,185	*28 732 457 177 33 10 8	*892 7,705 17,721 12,712 11,650 2,653 3,883 26,755	*14 183 165 55 10 4 2	*100 248 890 2,423 1,307 1,309 11 1,593

Table 1B.—Number of Private Foundations and Selected Financial Data, by Type of Foundation and Size of Fair Market Value of Total Assets, 1987—Continued

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

	Alak laur -4-		Net gain (less loss)	·	Excise tax	on net invetme	ent income		Total (in securities		assets
Size of fair market value of total assets	Net Investr	nent income	from sale			Domestic or	ganizations	Foreign org	ganizations	(book	value)	(book	value)	(fair mar	ket value)
tali market value of total assets	Number of returns	Amount	Number of returns	Amount	Total	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(16)	(17)	(18)	(19)	(20)	(21)	(22)	(23)	(24)	(25)	(26)	(27)	(28)	(29)	(30)
ALL FOUNDATIONS															
Total	30,720	11,279,279	13,362	5,567,476	174,250	29,777	173,402	46	848	35,161	93,783,400	21,223	69,946,993	35,049	114,301,195
		2,174	*41	*414	29	260	29			154	7,446	*14	*148		
inder \$100,000	10,346	37,887 463,221	2,168 5,914	2,761 128,677	641 7,696	10,015 12,847	641 7,692	*18	+3	14,162 13,657	456,021 4,627,421	5,035 9,915	173,633 2,508,487	14,190	459,435 5,038,021
1,000,000 under \$10,000,000	13,111 5,713	1,879,091	4,080	717,981	31,135	5,481	31,096 17,601	+i5	*39 35 17	5,882 712	15,649,389 9,608,393	5,043	10,189,634 6,803,444	5,882 712	17,902,316 11,127,180
10,000,000 under \$25,000,000	695 273	1,092,958 1,031,008 1,007,262	623 247	474,856 527,881	17,636 15,276	659 251	15,259	j 3	17	284 157	8,269,747 9,083,128	263 153 152	6,059,557 7,002,397	284 157	9,841,854 10,817,271
Zero or unreported 51 under \$100,000 51,000,000 under \$1,000,000 510,000,000 under \$10,000,000 510,000,000 under \$25,000,000 525,000,000 under \$50,000,000 50,000,000 under \$100,000,000	157 152	1,007,262 5,765,677	143 146	448,205 3,266,700	15,476 86,362	143 142	15,412 85,672	4	64 690	154	46,081,854	152	37,209,692	154	59,115,117
Nonoperating foundations															
Total	28,353	10,481,830	12,625	5,206,990	170,089	27,948	169,240	46	848	32,028	94,153,178	19,937	64,783,044	31,929	103,192,102
Zero or unreported	248	2,157	*41 2,071	*414 3,082	28 591	232 9,131	28 591	! :	:	140 12,625	7,397 407,917	*14 4,731	*148 165,981	12.652	417,515
\$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000	9,407 12,343	35,099 443,703	5.671	126,842	7,427	12,269	7,424 29,062	*18 *15	*3	12,800	4,346,769 14,033,585	9.467	2,426,707 9,485,981	12.814	4.728.844
51,000,000 under \$10,000,000	5,207 618	1,718,805 1,007,848	3,787 563 225	646,010 435,649	29,101 17,003	5,183 617	16,968	1	*39 35 17	5,296 626	8,561,698 7,396,129	4,620 583 241	6,332,380 5,626,608	5,296 626 255	9,858,314 8,861,114
\$25,000,000 under \$50,000,000	140	961,231 921,532	i 128	489,032 408,213	15,005 14,942	242 134	14,987 14,878	3 4	64 690	255 140	7,986,163	137	6,327,829	140 146	1 9,5/0,394
\$100,000,000 or more	144	5,391,655	138	3,097,748	85,992	140	85,302	4	690	146	41,413,521	145	34,417,430	140	53,836,417
Operating foundations											9,630,222	1,285	5,163,949	3,120	11,109,092
Total		797,448	737	360,486	4,162	1,829	4,162	•	•	3,134	*49	1 .	3,103,545	3,123	11,100,000
Zero or unreported \$1 under \$100,000 \$1,000,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000	*28 939	2,788	*97	*-321	50	*28 884	50] :	:	1,537	48,104	304 448 422 68 22 16	7,653	1,537	41,919 309,177
\$1,000,000 under \$1,000,000	768 505 77	19,518 160,286	243 293	1,835 71,971	268 2,034	578 278	268 2,034	:	:	856 586	280,652 1,615,804	422	81,780 703,673	856 586	1,982,813
\$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000	. 77 . 25	85,310 69,777	293 59 22	39,207 38,849	633 272	42 9	633 272	:	:	588 88 29 17	1,048,696 873,618	22	471,064 432,949	86 29	980,740
\$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 or more	. 25 17 8	85,730 374,022	15 8	39,992 168,952	534 370	9 2	534 370	:	:	17 8	1,096,965 4,668,333	16 7	674,568 2,792,262	17	1,246,877 5,278,700
GRANTMAKING FOUNDATIONS		",		135,233]									
Total	27,476	10,865,292	12,672	5,355,252	169,508	27,021	168,709	42	799	29,548	88,765,457	19,529	67,659,338	29,482	106,183,578
Zero or unreported	. 246	2,172	*41	*414	29 592	246 8,509	29 592	:	! :	*80 10,581	*2,487 375,178	*14 4,358	*148 157,275	10.595	383,250
Zero or unreported	. 8,703 12,092	35,302 437,612	2,030 5,682	2,929 124,630	7,248	11,930	7,244	*18	*3	12,384 5,308	4,205,184 14,066,040	9.373	2,408,253 9,481,810	10,595 12,384 5,308	4,592,772 16,026,076
\$1,000,000 under \$10,000,000	5,248 643	1,688,774 1,042,003	3,830 585	610,353 455,905	28,274 17,164	5,184 630 244	28,236 17,129	*15 1 2	*39 35 7	RAR.	8,786,948	4,644 605	6.454.627	5,306 648	10.185.757
\$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000	843 254 145	991,301 953,783	230 133 141	509,915 410,876	15,150 15,072	137	15,144 15,033	2 3	39	257 145 148	7,613,845 8,411,490 45,304,284	246 142 147	5,790,680 6,568,749	257 145	9,979,83
\$100,000,000 or more	. 146	5,714,344	141	3,240,231	85,978	140	85,302	3	677	148	45,304,284	147	36,819,797	148	58,009,670
Grantmaking-nonoperating foundations							1					40.000			101 024 27
Total	L .	10,390,682	12,251	5,142,182	168,267	25,993	167,468	42	799	28,129	82,782,802	18,889	64,106,969	28,062	101,624,374
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$10,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$55,000,000	. 232 8,123	2,157 33,163	1,947	*414 3.137	28 554	7,943	28 554	:	:	*80 9,849	*2,487 352,511 4,063,282	4,165	*148 151,197	9,863	359,626
\$100,000 under \$1,000,000	. 11,679 5,092	428,925	5,495 3,727	123,802 596,150	7,144 27,839	11,628 5,068	7,141 27,800	*18 *15	*3 *39	11,927 5,128	13,588,787	1 4515	9,256,496	11,927 5,128	4,435,716 15,436,874
\$10,000,000 under \$25,000,000	611	1,001,886 958,927	556 222	433,736 488,421	16,900 14,953	l 610	16,865 14,947	1 2	*39 35 7	615 247	8,381,845 7,274,924	576 238 134	6,239,697 5,594,710	615 247	9,678,956 8,645,265
\$50.000.000 under \$100.000.000	.; 13/	918,607	125 138	398,773	14,871	239 133 140	14,832 85,302	2 2 3	39 677	137 145	7,883,688 41,255,276	134 144	6,243,077 34,279,237	137 145	9,389,756
\$100,000,000 or more	. 143	5,391,323	138	3,097,748	85,978	140	85,502	"	0,,	140	41,230,270	'	0.,2.,0,20.		33,513,111
Grantmaking-operating foundations		474,610	421	213,071	1,241	1,028	1,241	_		1,420	5,982,655	639	3,550,370	1,420	6,559,20
Total	1	474,610 *15	421	213,0/1	110011	*14	1,241]			4,002,000			.,	
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000	580	2,140	83	-208	38	566	38	:	:	732 457	22,667 141,902	289	6,078 61,848	732 457	23,62 157,05
\$1,000,000 under \$1,000,000	. 412 155	8,687 33,080	103	828 14,203	103 436	302 118	103 436		:	177	477,253	129 29 8	205,314 214,830	177	589,20 506,80
\$10,000,000 under \$25,000,000 \$25,000,000 under \$50.000,000	. 580 412 155 . 32	40,117 32,374	188 103 29 8	22,169 21,494	265 197	20 5 4	265 197	:	:	33 10	1 338,921	8	195,970] 10	360,95
\$50,000,000 under \$100,000,000	., 0	35,176	8 3	12,103 142,483	201	4	201	:	:	8 3	547,802 4,049,008	8 3	325,672 2,540,560	8 3	590,07 4,331,49

Table 1B.—Number of Private Foundations and Selected Financial Data, by Type of Foundation and Size of Fair Market Value of Total Assets, 1987—Continued

Size of fair market value of total assets		in securities ket value)	Not	worth	Minimum	investment um	Distributat	ole amount	Qualifying o	distributions		s grant ve expenses	Undistribut	ted Income		stributions r to 1988
lair maiket value of total assets	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount	Number of returns	Amount
	(31)	(32)	(33)	(34)	(35)	(36)	(37)	(38)	(39)	(40)	(41)	(42)	(43)	(44)	(45)	(48)
ALL FOUNDATIONS	21,138	87,351,765	35,135	90,416,197	32,791	5,494,165	30,182	5,043,552	32,852	8,228,031	4,354	81,782	6,657	1,345,874	24,131	10,194,814
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 or more	5,021 9,878 5,025 647 263 153 152	180,449 2,853,382 11,933,881 7,900,038 7,304,635 8,474,289 48,705,091	195 14,107 13,646 5,882 711 284 157	-1,909 423,400 4,474,257 15,170,292 9,209,953 7,853,268 8,857,536 44,429,400	439 11,921 13,378 5,766 706 276 152 153	1,243 21,244 233,147 835,592 522,435 471,775 501,037 2,907,693	412 10,816 12,577 5,229 621 249 135	1,191 20,554 220,399 790,977 477,242 430,144 443,588 2,659,458	605 12,059 13,140 5,757 708 282 152 152	42,849 256,110 782,482 1,725,646 947,519 756,929 684,859 3,029,657	*110 1,955 1,539 596 83 38 13	*258 4,088 15,478 19,908 9,737 6,820 4,811 20,908	*28 1,914 2,791 1,469 214 118 51 72	418 2,762 33,353 153,786 113,479 125,172 114,203 602,699	494 8,302 9,855 3,778 410 135 84 72	35,768 1,120,709 1,704,060 3,217,329 1,474,180 805,304 699,107 1,138,357
Nonoperating foundations										,			·			
Total	19,865	81,732,088	32,002	81,409,148	30,242	5,112,749	30,182	5,043,552	30,197	7,351,789	3,971	66,996	6,657	1,345,874	24,131	10,194,814
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$20,000,000 \$50,000,000 under \$50,000,000 \$100,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	4,717 9,440 4,603 582 241 137 145	171,634 2,757,004 11,084,759 7,376,247 8,831,748 7,720,829 45,789,887	181 12,570 12,789 5,296 625 255 140 148	-1,958 376,936 4,212,153 13,710,754 8,280,698 7,172,804 7,815,636 39,842,126	412 10,857 12,588 5,235 622 249 135 145	1,203 19,788 222,925 775,716 486,344 437,972 454,159 2,714,642	412 10,818 12,577 5,229 621 249 135	1,191 20,554 220,399 790,977 477,242 430,144 443,588 2,659,458	563 10,899 12,371 5,208 622 254 135 144	41,856 236,726 706,535 1,514,904 823,743 651,795 578,595 2,796,635	*97 1,748 1,429 556 85 35 12	*232 3,172 11,495 15,159 7,383 6,693 1,955 20,908	*28 1,914 2,791 1,469 214 118 51 72	*418 2,762 33,353 153,786 113,479 125,172 114,203 802,699	494 9,302 9,855 3,778 410 135 84 72	35,768 1,120,709 1,704,060 3,217,329 1,474,180 805,304 699,107 1,138,357
Operating foundations				• .			·				·					
Total	1,273	5,619,677	3,134	9,007,049	2,549	381,417	N/A	N/A	` 2,655	874,242	383	14,786	N/A	N/A	N/A	N/A
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	304 437 422 65 22 16 7	8,815 96,377 849,122 523,791 472,887 753,460 2,915,224	*14 1,537 856 588 86 29 17 8	*49 48,484 262,104 1,459,538 929,256 680,484 1,041,900 4,587,274	*28 1,063 790 532 84 27 17 8	*40 1,456 10,222 59,876 36,091 33,803 48,878 193,051	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A	*41 1,160 768 549 84 28 17	*993 19,383 75,927 210,742 123,776 105,134 105,264 233,021	*14 207 *110 *39 8 3	*24 894 *3,983 *4,747 2,354 128 2,656	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A
GRANTMAKING FOUNDATIONS																
Total	19,483	84,650,414	29,509	86,093,389	28,835	5,322,230	27,534	5,013,571	30,037	7,642,851	3,932	69,180	5,479	1,336,962	22,585	9,928,435
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$2,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 under \$100,000,000	4,372 9,348 4,627 603 248 142 147	162,447 2,748,330 11,085,338 7,508,401 6,996,825 7,978,841 48,192,234	*80 10,553 12,373 5,308 647 257 145	*2,284 349,234 4,086,835 13,812,249 8,581,105 7,368,066 8,222,233 43,671,583	412 9,697 12,249 5,284 648 256 142 148	1,241 19,022 220,453 779,503 497,857 450,394 474,112 2,879,848	398 9,048 11,836 5,114 814 248 134	1,190 18,839 210,735 779,135 473,198 428,545 442,473 2,659,458	563 10,595 12,384 5,301 648 257 142 147	42,065 234,547 714,649 1,544,363 856,975 861,338 623,533 2,965,380	*97 1,693 1,429 565 91 37 12	*232 2,638 11,900 16,133 8,642 6,772 1,955 20,908	*28 1,196 2,398 1,410 208 118 50 72	*418 1,937 30,453 151,001 111,336 125,172 113,845 802,699	453 8,253 9,474 3,714 407 128 84 72	34,968 1,044,283 1,607,942 3,165,509 1,462,361 773,888 699,107 1,138,357
Grantmaking-nonoperating foundations			7476 19 61			1,7								2. 2.		
Total	18,855	80,995,319	28,069	80,298,149	27,554	5,082,930	27,534	5,013,571	28,590	7,283,840	3,674	65,618	5,479	1,336,862	22,585	9,926,435
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$1,000,000 under \$10,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 or more	4,179 9,088 4,498 575 238 134 144	155,349 2,674,308 10,833,687 7,280,551 6,787,507 7,612,265 45,651,674	*80 9,821 11,916 5,128 614 247 137 145	*2,284 326,909 3,948,931 13,387,029 8,180,210 7,074,175 7,694,691 39,683,920	398 9,076 11,825 5,115 615 248 134 145	1,203 18,037 214,608 762,912 482,198 436,331 452,999 2,714,642	398 9,048 11,836 5,114 614 246 134	1,190 18,839 210,735 779,133 473,198 428,545 442,473 2,659,458	538 9,863 11,927 5,124 615 247 134 144	41,073 225,246 681,275 1,498,482 819,740 642,552 578,838 2,796,635	*97 1,527 1,363 547 85 34 12	*232 2,408 11,120 14,968 7,383 6,644 1,955 20,908	*28 1,196 2,398 1,410 208 118 50 72	*418 1,837 30,453 151,001 111,336 125,172 113,845 802,699	453 8,253 9,474 3,714 407 128 84 72	34,968 1,044,283 1,807,942 3,185,509 1,482,381 773,888 699,107 1,138,357
Grantmaking-operating foundations	- ;		54 A								•					[]
a se Total	627	3,655,094	1,420	5,795,241	1,281	239,300	N/A	N/A	1,447	359,011	258	3,562	N/A	N/A	N/A	N/A
Zero or unreported \$1 under \$100,000 \$100,000 under \$1,000,000 \$10,000,000 under \$25,000,000 \$10,000,000 under \$25,000,000 \$25,000,000 under \$50,000,000 \$50,000,000 under \$100,000,000 \$100,000,000 or more	193 258 129 28 8 8	7,097 72,024 231,669 227,850 209,319 368,576 2,540,560	732 457 177 33 10 8 3	22,325 137,704 425,220 400,895 293,892 527,543 3,987,662	*14 621 424 169 33 10 8	*38 985 5,845 16,590 15,659 14,063 21,113 165,006	N/A N/A N/A N/A N/A N/A N/A	N/A N/A N/A N/A N/A N/A N/A	*28 732 457 177 33 10 8 3	*992 9,301 33,374 45,881 37,235 18,786 44,695 168,745	166 *66 *17 6 3	230 *780 *1,164 1,259 128	N/A N/A N/A N/A N/A N/A N/A	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	NA NA NA NA NA NA NA	N/A N/A N/A N/A N/A N/A

N/A - not applicable

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

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

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

ltem		Size of fair market value of total assets							
	Total	Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 under \$25,000,000	\$25,000,000 under \$50,000,000	\$50,000,000 under \$100,000,000	\$100,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)
Number of returns	35,172	1,215	13,771	13,167	5,730	713	270	155	151
Total assets (book value)	87,191,337	*131	437,268	4,164,836	14,840,939	8,977,299	7,460,288	8,460,707	42,849,868
Cash, total Non-interest bearing accounts	11,813,575	*131	221,107	1,317,029	3.035.647	1,221,253	969,402	954,441	4,094,566
Non-interest bearing accounts	1,211,283	*131	54,531	290,444	426,424	l 120.477	82,176	78,529	158,571
Savings and temporary cash investments Accounts receivable, net	10,602,293 608,181	•	166,576 5,545	1,026,585	2,609,222	1,100,777	887,226	875,911	3,935,995
Pledges receivable, net	81,228		*384	19,897 *1,236	76,397 *43,218	39,291 35,966	27,141 444	28,537	411,373
Grants receivable	64,475	•	*1,785	*19,624	+9,638	1,414	9,047	4,637	18.330
Receivables due from disqualified persons	18,807 948,342	•	7.427	*1,526	*16,387	165	183	12	535
Inventories	55,150		*894	61,569 *2,955	316,395 *8,722	146,824	69,979	135,265 3,003	210,884
Inventories Prepaid expenses and deferred charges	36,088	•	*2,605	4898	2,808	34,530 11,739	2,286 1,712	8,977	2,760 7,351
Investments, total	69,404,049	-	178,084	2,493,534	10,354,976	1 6.908.674	6,038,358 5,507,692	6,886,083	36,544,342
Land, buildings, and equipment fless accumulated	64,184,892	•	160,341	2,041,805	9,407,579	6,303,287	5,507,692	6,395,801	34,368,387
Investments, total Securities Land, buildings, and equipment (less accumulated depreciation)	1,509,361		*327	87,356	112,488	126,520	184,195	122,633	875,844
Mortgage leans Other investments Charitable-purpose land, buildings, and equipment (less	543,193	•	*5,947	24,120	222,659	48,160	66,730	29,761	145,817
Charitable numose land buildings and equipment fless	3,166,603	•	11,469	340,252	612,250	430,707	279,742	337,889	1,154,295
accumulated depreciation)	2,297,235		11,687	165,162	525,003	328,459	196,296	265,479	905 440
Other assets	1,864,201		7,770	81,405	451,749	248,984	145,441	174,272	805,148 754,579
Total liabilities	3,690,297	*15	26,961	174,752	502,524	365,152	355,073	292,508	1,973,312
Het worth	83,501,039	*116	410,307	3,990,084	14,338,414	8,612,147	7,105,215	8,168,200	40,876,556
Total revenue	20,031,228	60,308	376,791	1,482,104	4,040,566	2,213,381	1,831,520	1,812,129	8,214,429
Contributions, gifts, and grants received interest on savings and temporary cash investments Dividends and interest from securities	7,152,515	47,384	319,285	1,089,927	1,959,479	908,732	695,505	535,052	1,597,152
Interest on savings and temporary cash investments	973,627	1,680	12,973	77,484	231,148	134,581	94,448	108,959	312,354
(iross rents	4,173,428 180,255	3,503	15,939 *1,544	160,030 14,083	646,687 34,940	416,416	351,979	407,604	2,171,271
Net gain (less loss) from sale of assets Gross profit from business activities Other income	6,994,128	*7,184	14,760	110,649	939,321	11,504 680,325	34,162 571,793	31,123 674,379	52,919 3,995,716
Gross profit from business activities	209,405	*407	7,410	2,871	142,001	10,200	16,599	15,566	14,352
Uther income	347,866	*150	4,879	27,080	88,990	51,624	67,034	39,445	70,684
Total expenses	8,274,395 6,301,524	135,911	406,572	710,055	1,732,485	940,386	738,318	741,231	2,869,438
Contributions, gifts, and grants paid Compensation of officers	174,205	130,478 *188	360,393 6,983	523,672 14,158	1,227,712 49,998	719,298 19,042	554,171 17,668	526,043 16,837	2,259,758
Other salaries and wages Pension plans and employee benefits Legal fees Accounting fees Other professional fees Interest	383,442	*901	6,286	49,926	103,641	40,457	34,966	37,494	49,329 109,771
Pension plans and employee benefits	91,189	*143	*583	*3,609	21,702	6,741	6.455	8,670 7,421	43,285
Accounting fees	49,217 35,954	*333 *214	1,097 1,997	5,642 6,273	13,058 12,529	5,165	3,829	7,421	12,872
Other professional fees	210,183	*37	2.024	7,270	40,010	4,731 20,599	3,157 19,490	3,032 23,955	4,021 96,799
Interest	57,407	•	233 1,764	5,100	18,492	9,451	9.383	9.457	5,291
Taxes Depreciation and depletion	225,595 100,260	301	1,764 1,369	12,240	39,697	23,525	18,898	27,311	101,859
Occupancy	99,636	*44	2,412	6,965 8,842	23,885 22,720	15,712 15,327	13,726 9.494	16,809 7,705	21,794
Occupancy Travel, conferences, and meetings	43,359	-	3,515	2,897	10,759	3,200	2,198	3,263	33,092 17,528
Printing and publications Other expenses	20,950	*14	2,180	878	3,391	1,852	1,377	3,766	7,492
Evenes of revenue (less less) over evenes	481,467 11.756.831	3,258	15,735	62,580	144,890	55,285	43,507	49,488	108,747
Excess of revenue (less loss) over expenses Excess of revenue, total	12,449,741	- 75,603 *240	-29,782 122,537	772,049 876,005	2,308,081 2,448,441	1,272,995 1,326,699	1,093,202	1,070,898	5,344,991
Loss, total	692,910	75,843	152,319	103,956	140,361	53,704	1,157,320 64,118	1,097,883 26,985	5,420,615 75,625
Total acceta (fair market value)	113,175,809	•	451,268	4,657,968	17,889,686	11,221,270	9.289.741	10.822.037	58,843,840
Cash, total	11,837,309	-	221,282	1,317,624	3,038,533	1,230,092	972,811	954,933	4,102,035
Non-interest bearing accounts	1,216,403	•	57,347	290,703	427,409	120,625	82,175	78,599	159,548
Non-interest bearing accounts Savings and temporary cash investments Accounts receivable, net	10,620,906 605,970	: 1	163,935 5.545	1,026,921 19,427	2,611,124 75,960	1,109,467 37,845	890,636	876,334	3,942,489
Piedos receivable, net	81,224	-	5,545 *364	*1.236	*43,214	37,045	27,141	28,537	411,515
Grants receivable	64,894	•	*1,785	*20,080	*9,638	1,414	9,047	4,600	18,330
Grants receivable Graceivables due from disqualified persons Other notes and loans receivable	18,807 984,795	•	7.427	*1,526 61,700	*16,387	165	183	1 12	535
Inventories	53,777	:	*650	*2.955	312,033 *8.676	148,762 32,483	63,398 2,286	135,441 3,163	256,035 3,585
Inventories Prepaid expenses and deferred charges Investments, total	73,314	-	*2,816	*898	2,806	11,739	1.708	8,968	44.381
Investments, total	93,798,841 87,014,561	•	189,058	2,928,292	13,180,597	8,903,817	7,781,321	9,169,606	51,646,150
Land, buildings, and equipment (less accumulated	01,014,001	•	169,817	2,490,138	12,007,407	8,161,108	7,082,033	8,392,341	48,711,720
Land, buildings, and equipment (less accumulated depreciation)	2,272,023		*503	107,451	220,887	163,754	323.528	321.085	1,134,816
Mortgage loans	560,697	-	*5,965	24,121	240,497	48,493	66,197	29,607	145.817
Other investments	3,951,559	•	12,773	306,582	711,807	530,464	309,562	426,574	1,653,798
accumulated depreciation)	2,882,673	. 1	12,452	201,404	665,616	359,919	248,884	290,175	1,104,222
Other assets	2,771,324		9,888	99,946	536,226	459,088	246,664 182,522	290,175 226,602	1,104,222
Total assets, beginning of year (book value)	73,433,763	161,762	467,480	3,363,216	12,266,450	7,675,266	6,201,612	7.275.884	36,022,094
Investments in securities, beginning of year (book value)	54,532,656	*89,248	219,337	1,578,562	7,831,212	5,397,466	4,593,416	5,465,601	29,357,814

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

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

Table2B.—All Private Foundations: Balance Sheets and Income Statements, by Size of Fair Market Value of Total Assets, 1987

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

e e e e e e e e e e e e e e e e e e e	Total				1 21 222 222				· · · · · · · · · · · · · · · · · · ·
		Assets zero or unreported	\$1 under \$100,000	\$100,000 under \$1,000,000	\$1,000,000 under \$10,000,000	\$10,000,000 under \$25,000,000	\$25,000,000 under \$50,000,000	\$50,000,000 under \$100,000,000	\$100,000,000 or more
	(1)	(2)	(3)	(4)	(5)	(6)	m	(8)	(9)
·					<u> </u>				
lumber of returns	35,907	858	14,190	13,671	5,882	712	284	157	154
Total assets (book value)	93,783,400	7,446	456,021	4,627,421	15,649,389	9,608,393	8,269,747	9,083,128	46,081,854
Cash, total Non-interest bearing accounts Savings and temporary cash investments Accounts receivable, net	12,095,264	2,734	219,483	1,357,993	2,972,452	1,222,067 140,146	1,133,994 80,648	956,905	4,229,637 85,373
Non-interest bearing accounts	1,086,319 11,008,946	2,699 *35	61,079 158,404	286,047 1,071,947	341,381 2,631,071	1,081,922	1,053,346	88,947 867,958	4,144,264
Accounts receivable net	383,144	*222	3,926	28,875	65,599	40.807	29,247	23,210	191,258
Pledges receivable, net	124,677		3,926 *283	*3,429	35,174	53,106	16,343	,	16,342
Grants receivable	69,242	•	*552 *314	*21,698	*16,848	9,718	4,044	2	16,379
Receivables due from disqualified persons	37,554	•••	*314	*6,627	29,735	110.055	111	282	485 201,287
Other notes and loans receivable	818,481 45,356	*10	5,605 *2,171	92,424 *6,591	203,038 2,114	119,255 2,685	92,388 25,807	104,494 3,339	201,287
Inventories	58,384		1,540	6.818	16,648	4.398	2,478	15,011	11,491
Prepaid expenses and deferred charges	75,894,006	*148	192,531	2.891.139	11.326,473	7,578,175	6.535.966	7,500,090	39.869.485
Securities	69,946,993	*148	173,633	2,508,487	10,189,634	6,803,444	6,059,557	7,002,397	37,209,692
Securities Land, buildings, and equipment (less accumulated							,	400.470	004 000
depreciation)	1,645,105 476,745	•	2,960 *3,445	73,161 32,481	199,313 181,105	152,518 56,983	173,621 28,282	122,170 44,013	921,362 130,436
Other investments	3,825,163		12,492	277,010	756,421	565,229	274,508	331,510	1,607,994
Charitable-purpose land, buildings, and equipment fless			1	1 1	1		· ·	· ·	
accumulated depreciation)	1,775,761	*4,324	9,918	132,616	516,970	292,293	198,097	314,789	306,754
Other assets	2,481,526	*9	19,697	79,208	464,337	285,889	231,294	165,006	1,236,086
l'otal liabilities	3,367,202	*9,356	32,621	153,164	479,097	398,440	416,479	225,592	1,652,454
let worth	90,416,197	-1,909	423,400	4,474,257	15,170,292	9,209,953	7,853,268	8,857,536	44,429,400
Cotal revenue	17.116.794	18,506	292,969	1,254,630	3,369,230	1,911,881	1,696,361	1,624,120	6,951,097
Contributions, clifts, and grants received	5,285,234	14,322	247,081	818,208	1,501,066	787,793	582,475	531,563	802,725
Contributions, gifts, and grants received	1,082,734	1,030	12,506	91,913	253,525	126,164	116,065	107,349	354,182
Dividends and interest from securities	4,513,899	* 715	13,738	187,787	700,058	453,867	374,550	439,552	2,343,632
Gross rents	202,374		2,408	10,906	48,388	9,979	28,267	36,087	66,342 3,266,700
Net gain (less loss) from sale of assets	5,567,476 118,164	*414	2,761 5,202	128,677 2,706	717,981 56,061	474,856 8,812	527,881 3,850	448,205 24,492	17,041
Other income	366,908	*25	9,273	14,431	92,150	50,408	63,272	36,872	100,476
Total expenses	9,072,066	46,362	285,254	830,777	2,010,489	1,018,447	845.823	759,035	3,275,880
Contributions with and empty pold	7,060,741	42,020	228,314	683,575	1,548,349	775,481	813,824	546,567	2,622,611
Compensation of officers Cher salaries and wages Pension plans and employee benefits Legal fees Accounting fees Cither professional fees	185,130	42,020 *247	4,137	16,939	48,727	23,508	20,380	17,843	53,549
Other salaries and wages	349,295	*190	9,561	28,722	82,385	39,063	42,455	41,302	105,617
Pension plans and employee benefits	79,003	l:	873	2,576	12,001	7,130	8,182	9,650	38,591
Legal fees	50,303	892	1,756 2,533	6,220	13,808	5,281	3,732	5,454 4,036	13,161
Accounting fees	49,382 224,706	224 *155	2,533	9,637 8,815	15,359	6,704 22,555	4,607 21,839	25,969	6,283 106,263
	59.011	133	288	3,120	36,430 20,748	13,762	11,680	4,830	4,584
Taxes	296,125	97	1,865	15,733	57,537	35,498	28,186	34,793	122,416
Depreciation and depletion	95,840		1,003	5,107	23,085	15,336	15,940	13,831	21,537
Occupancy	93,663	*146	2,075	6,988	18,592	9,480	10,751	8,992	36,658
Travel, conferences, and meetings	45,013 22,702	*311 39	3,733 2,239	2,653 1,348	7,442 2.618	3,553 2,213	2,955 1,470	4,442 4,563	19,923 8,212
Other expenses	481,143	2.038	24,195	39,340	123,407	58,902	59,822	36,964	116,474
Excess of revenue (less loss) over expenses	8.044.727	-29.857	7,716	423,853	1,358,741	893,434	850,538	865,086	3,675,217
Excess of revenue, total	9.180.495	*498	62,793	629,413	1,724,554	1,019,462	963,773	952,091	3,827,911
Loss, total	1,135,768	30,355	55,078	205,560	365,813	126,028	113,235	87,005	152,694
Total assets (fair market value)	114,301,195		459,435	5,038,021	17,902,316	11,127,180	9,841,854	10,817,271	59,115,117
Cash, total	12,076,930	.	219,307	1,355,119	2,970,050	1,213,596	1,128,473	957,806	4,232,579
Cash, total Non-interest bearing accounts	1,077,628	-	61,064	283,226	341,998	134,710	80,298	88,757	87,576
Savings and temporary cash investments	10,999,302	-	158,243	1,071,893	2,628,052	1,078,886	1,048,175	869,049	4,145,004
Accounts receivable, net	395,547	•	3,893 *283	29,996	67,688	43,075	35,567	22,974	192,354
Pledges receivable, net	124,611	i -	*1,264	*3,429 *21,783	35,070 *16,848	53,108 9,718	16,381 4,044	;	16,342 18,379
Grants receivable	70,039 46,010	i :	*314	*6,304	38,513	9,710	111	282	485
Receivables due from disqualified persons Other notes and loans receivable	851,740		5,605	91,541	195,154	120,702	86,487	105,164	247,107
Inventories	50,950		*1,967	*9,118	2,724	2.823	25,807	1 5,117	3,394
Inventories Prepald expenses and deferred charges Investments, total	103,169	j	1,417	6,755	26,123	4,359	2,472	15,010	47,034
Investments, total	94,810,924		199,824	3,259,451	13,299,145	8,892,602	7,935,196	9,189,088	52,035,620
Securities Land, buildings, and equipment (less accumulated depreciation) Mortgage loans	87,351,765		180,449	2,853,382	11,933,881	7,900,038	7,304,635	8,474,289	48,705,091
Land, buildings, and equipment (less accumulated	2 466 601	ŀ	3,490	105,240	338,562	212.563	309,700	298,247	1,199,078
Morrosca Joseph	2,466,881 482,091	1 :	*3,490	32,112	186,181	56,986	28.304	44,054	131,009
Other Investments	4,510,186	1 :	12,439	268,718	840,522	723,014	292,557	372,498	2,000,441
Charitable-purpose land, buildings, and equipment (less	7,0 ,0,100	I	15,700	-50,7,0	0,022		1	1	l .
accumulated depreciation)	2,309,957		11,840	154,841	720,185	426,695	252,642	308,295	435,460
Other assets	3,452,088		13,204	96,091	525,694	360,504	354,695	213,535	1,888,363
Total beginning of year assets (book value)	86,019,399	33,660	451,538	4,166,481	14,167,916	8,676,455	7,415,644	8,211,953	42,895,752
nvestments in securities, beginning of year (book value)	63,514,189	10,938	165,550	2,208,040	9,022,169	6,046,596	5,384,627	6,307,046	34,369,223

^{*}Estimate should be used with caution because of the small number of returns on which it is based. NOTE: Detail may not add to total due to rounding.