

January 13, 2026

***Request for Comments on U.S. Tax-Exempt Income Tax Return, Form 990 Series***

*OMB Control Number: 1545-0047*

To Whom It May Concern:

We thank the Department of the Treasury and the Internal Revenue Service (IRS) for this opportunity to submit comments on the Form 990 series. The comments that follow address ways to enhance the quality, utility, and clarity of 990 information and reduce the burdens faced by the public when accessing and using this important public dataset.

The groups and individuals submitting these comments are leading members of the tax-exempt community in the United States, working with the Nonprofit Open Data Collective convened by the Aspen Institute's Program on Philanthropy and Social Innovation.

These nonprofit organizations, donor groups, researchers, data scientists, and Form 990 platforms play a key role in taxpayer compliance by communicating with the public, particularly donors, through the provision and analysis of "open" 990 data, which includes critical information on tax-exempt activities, finances, and governance.

Signatories include: Candid; Charity Navigator; DataLake Nonprofit Research; Do Good Institute, University of Maryland; Dorothy A. Johnson Center for Philanthropy at Grand Valley State University; Independent Sector; Minnesota Council of Nonprofits; National Committee for Responsive Philanthropy; and The Nonprofit Alliance, as well as prominent scholars of tax-exempt activity, writing in their individual capacities.

Should you have any questions, please contact Cinthia Schuman Ottinger at the Aspen Institute's Program on Philanthropy and Social Innovation at [cinthia.schuman@aspeninstitute.org](mailto:cinthia.schuman@aspeninstitute.org).

Sincerely,



Cinthia Schuman Ottinger  
Program on Philanthropy and Social Innovation  
Aspen Institute  
2300 N Street NW, Suite 700  
Washington, DC 20037

# Comments on U.S. Tax-Exempt Income Tax Return, Form 990 Series

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## **SUMMARY OF RECOMMENDATIONS**

We thank the Department of the Treasury and the Internal Revenue Service (IRS) for this opportunity to submit comments on the Form 990 series, focusing on ways to enhance the quality, utility, and clarity of the information to be collected and reduce the burdens associated with accessing and using this important public dataset. The groups and individuals submitting these comments are members of the Nonprofit Open Data Collective — convened by the Aspen Institute — which brings together a cross-section of the Form 990 user community, including tax-exempt organizations, private foundations, leading Form 990 platforms for donors, scholars, and state charity regulators.

In 2019, the Taxpayer First Act was signed into law and included provisions to advance the transparency, efficiency, and understanding of the tax-exempt sector. The law mandates electronic filing of tax-exempt returns and the timely release of this information by the IRS in a machine-readable format. As a result of the law, access to Form 990 data has become more efficient than ever before, creating a wealth of information for donors, nonprofit organizations, regulators, and the general public. Such information has the potential to greatly improve compliance and oversight by providing the public and government officials with tools to more efficiently detect and locate irregularities, or errors. Such efforts also help to reduce the cost of monitoring the tax-exempt sector for both the IRS and taxpayers.

The recommendations summarized and detailed below support the implementation of the Taxpayer First Act, strengthening the public's access to critical information on tax-exempt organizations and activities.

### **1. Address Missing Grants Data: Information on Billions of Dollars in Grants by Foundations and Other Funders is Missing from Forms 990-PF and 990 Files Posted by the IRS**

Information on grants made by foundations and other funders is incomplete as posted on the IRS website. Research by Candid has found that billions of dollars in grants made by private foundations and other funders are missing from Forms 990-PF and 990 XML files *and* PDF files provided by the IRS.

We describe these findings in greater detail below and suggest steps to address them.

### **2. Further Improve 990 Data Access, Usability and Efficiency**

The IRS has taken steps to improve the user experience through the Tax Exempt Organization Search (TEOS) Modernization Project in response to stakeholder feedback. This includes a new TEOS page with links to the public disclosure datasets, dataset guides, annotated forms, data dictionaries, schemas and FAQs. Such information is highly useful to the 990-user community.

Notwithstanding this, we recommend additional improvements that are necessary to reduce taxpayer burden. Simple steps — like providing an accurate listing of 990 postings — can cut down on taxpayer work and expense, while enhancing public access to taxpayer information.

For example, now the public must download the *entire* 990 series on a regular basis (exceeding 1 terabyte of data) to discern which 990s have been most recently updated and to locate specific returns. This results in an extraordinary waste of time, resources, and bandwidth – and consequently limits access to the index file to only those with unlimited processing and storage capacity. Reverting to the indexing approach previously used by the IRS on Amazon Web Services (AWS) would significantly reduce taxpayer burden. See below for details on this and other related TEOS recommendations.

### **3. Continue to Maintain a Regular and Timely 990 XML Data Release Schedule and Address Unavailable Files for 990s PDF Bulk Download**

In early 2025, there was a concerning service outage on the [IRS Form 990 Series Downloads page](#) that lasted for roughly one month. We appreciate that the Tax Exempt and Government Entities division’s (TE/GE) is now regularly releasing 990 e-files via [IRS.gov](#)

We note, however, that for Form 990 series, PDF bulk download, the individual zip files remain unavailable (see for example, [Form 990 series downloads – 2024 | Internal Revenue Service](#)).

As you know, the tax-exempt field experienced almost three years of significant delays in the posting of 990 data, from 2020-2023. During this period, many tax-exempt organizations dutifully filed their annual information returns with the IRS, but the returns were not shared with the public for months, or even years. Affected nonprofits were unfairly suspected of being out of compliance, donors were potentially misinformed, and many state charity regulators were deprived of an essential tool for investigating fraud. (See 2022 Comments to the IRS from the [National Association of State Charity Officials](#) and the [Nonprofit Open Data Collective](#)).

We cannot stress enough the importance of maintaining a regular and timely 990 data release schedule. We appreciate that TE/GE has returned to regularly releasing 990 XML files and urge that it post 990 data frequently and systematically while addressing the current unavailability of files in the PDF bulk download section.

### **4. Report Government Revenue on Form 990 and Include EINs of Grants on Form 990-PF**

In addition, we highlight two ongoing problems with the Forms 990 and 990-PF.

First, we demonstrate broad support for improving the reporting of government revenue on the Form 990 from both the nonprofit and accounting communities. We describe the necessity of such information for compliance purposes and suggest solutions that could be implemented via changes in instructions, rather than changes to the form.

Second, we note concerns regarding the reporting of grants information on the Form 990-PF, separate and apart from the missing grants data described above. Currently, there is a disparity in

the reporting of grants information by *public* foundations/grantmakers (which file the Form 990) versus *private* foundations (which file the Form 990-PF). Public foundations must report the name — and importantly, the EINs — of their grantees on Schedule I of Form 990.

We suggest requesting the reporting of grantees' EINs on *both* Forms 990 and 990-PF, making the forms consistent in this regard. This would significantly enhance the ability of individual users to identify grantees, help track this information for compliance purposes, and further public understanding of private foundation grantmaking, totaling billions of dollars annually.

## **5. Continue to Make Essential SOI Data Publicly Available and Address 990-PF Gaps**

Finally, we applaud the helpful role of the IRS Statistics of Income (SOI) division concerning tax-exempt organizations. We hope the IRS will continue to make this valuable research available while addressing gaps in the extracts for specific forms, such as the Form 990-PF. SOI summary tables are critical to the understanding of the breadth and scope of the tax-exempt sector.

## **RECOMMENDATIONS IN DETAIL**

To improve data timeliness, quality, and accessibility while reducing taxpayer and public burden, we urge the IRS to take the following steps with respect to the Form 990 series:

### **1.Recommendation: Address Billions of Dollars in Missing Grants Data from Forms 990-PF and 990 Files Posted by the IRS**

In comments submitted to the IRS over the last three years, members of the Nonprofit Open Data Collective have written with great concern of missing data from Forms 990-PF and 990 that are posted by the IRS. This missing data represents billions of dollars in grants made by public and private foundations.

This disturbing situation has yet to be rectified: Candid, a leading provider of information on tax-exempt entities, continues to find hundreds of cases in which grants data is completely missing from 990 and 990-PF XML files across multiple fiscal years.

This situation is untenable given the critical importance of grants data released by the IRS to the public. As we've noted in the past, IRS 990 filings are often the *only* source of information about charitable grantmaking. This is because the majority of foundations in the United States do not have websites. In the case of private foundations, which hold over \$1 trillion in assets, such grantmaking is considerable.

Data on grants is not only crucial for determining legal compliance. If information on grantmaking is missing, the public lacks the transparency needed to track billions of charitable dollars, leaving donors, lawmakers, tax-exempt organizations, state charity regulators, scholars and others in the dark about how tax-exempt money is being used for the public good.

The IRS has suggested that when grants data is not available in an XML format, it should be available in PDF versions of these forms. We would strongly argue that the provision of such information in a PDF format is not consistent with the Taxpayer First Act of 2019 and is not a substitute for producing this information in a machine-readable format.

Nonetheless, in response to the IRS' suggestion, over a year ago Candid established a process to:

- Identify independent, community, family, operating, and company-sponsored foundations, as well as large grantmaking public charities, that report total giving of at least \$500,000 but have no or only partial grants data in IRS XML files
- Determine whether the grants data missing from the IRS XML files is available in the 990 and 990-PF PDF versions of the forms on the IRS' website

To date, Candid has found over 2,000 cases in which there was no or only partial grants data in the Form 990 and 990-PF XML files for FY 2019-2024. Filings with partial data follow at least two patterns:

- **Filings with partial grants lists:** In these cases, funders provide information for a few grants in the appropriate section but point to an attachment for the rest.
- **Filings with a single grant to a “recipient”** such as “See attachment,” “Schedule available,” “See Line 3A statement,” etc.

In a large number of cases grants data was not available in PDF format either. In other cases, Candid was unable to determine whether the grants data was available in the PDF version of the return either because the return was inaccessible (i.e., the link to the return yielded an error message) or because the PDF version of the return was not yet available on the IRS website.<sup>1</sup> The latter was particularly true for more recent fiscal years (e.g., 2023 and 2024). This means that, in many circumstances, the IRS is not providing vital grants information to the public, at all.

As you know, in its 2022 and 2024 reports, the IRS Advisory Council (IRSAC) examined issues that practitioners face when obtaining 990 data from the IRS website. IRSAC raised concerns that speak to the lack of timely, consistent, and *complete* Form 990 data posted by the IRS. As stated in 2024, the Council calls on the IRS to “investigate and implement operational improvements to ensure all available data is uploaded and available on the IRS websites in a timely (at a minimum, monthly) and consistent manner and information posted is a complete representation of the most recent information the IRS has for tax exempt organizations.”

Furthermore, the Taxpayer First Act mandates that electronically filed returns be made available to the public in a machine-readable format as soon as practicable. Releasing grants data via PDF files involves manual work that is burdensome, time-consuming, and expensive to users. Releasing grants data via PDF files is not an acceptable alternative to posting complete grants data via XML files, nor is it consistent with the Taxpayer First Act.

We once again urge the IRS to investigate this matter and take steps to ensure that the 990 and 990-PF filings it receives and makes available to the public are complete and machine-readable.

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<sup>1</sup> Since Candid Conducted Its Research in July 2025, Additional PDF Returns May Have Been Posted.

This includes ensuring that grants attachments require grant recipient addresses and EINs (see Recommendation 4c below) – without an address or EIN, it can be impossible to determine the actual recipient of grant funding.

If the problem concerning missing XML grants data is related to the attachments themselves, the IRS may need to improve IRS XML data transmission and validation standards to require 990 software providers to upload grant listings and other detailed attachments/schedules in standardized, machine-readable formats.

We have also noted additional gaps outside of grants data. For example, there are many filings that either have missing attachments detailing individual trustee/staff and their compensation in Part VII, or a mismatch between what is reported for total compensation in Part I and what is reported in the trustee/staff compensation in Part VII.

All of this points to the need for further investigation and technical solutions by the IRS. Members of the Nonprofit Open Data Collective are available to hold a technical working group of stakeholders to discuss these issues further with the IRS at your earliest convenience.

## **2. Recommendation: Further Improve 990 Data Access, Usability and Efficiency**

We greatly appreciate that the IRS has taken steps to improve the user experience through the Tax Exempt Organization Search (TEOS) Modernization Project, in response to stakeholder feedback. This includes a new TEOS page with links to the public disclosure datasets, dataset guides, annotated forms, data dictionaries, schemas and FAQs. Such information is highly useful to the 990-user community.

Notwithstanding this, we recommend additional necessary improvements to Form 990 data releases and the TEOS improvement pages in order to reduce taxpayer burden further.

### ***2a. Clearly organize and label 990 XML data releases to improve access and efficiency while reducing taxpayer burden.***

Simple steps — like providing an accurate listing of 990 postings — can cut down on taxpayer work and expense, while enhancing public access to taxpayer information.

The public must now download the *entire* 990 series on a regular basis (exceeding 1 terabyte of data) to discern which 990s have been most recently updated and to locate specific returns. This results in an extraordinary waste of time, resources, and bandwidth – and consequently limits access to the index file to only those with unlimited processing and storage capacity.

Because 990 data is released in “waves” or “batches,” at least one version of the bulk download page should be organized by chronological batch release date instead of tax year. Once a zipped batch file is released, its contents should not be changed in the future.

Each zipped batch file would best be accompanied by a listing and description of the file contents, i.e. an index, with key information (form type, tax year, etc.). This approach was used by the IRS for years, thus demonstrating that this would not be an administrative problem.

We strongly urge that the IRS return to the previous, more efficient method of organizing/labeling information to reduce taxpayer burden.

***2b. In addition to including a listing of the filings for each release, links to the schema used for that filing should be provided.***

After reviewing and analyzing the new TEOS webpages, GivingTuesday - a leading organization working to advance generosity through data, insights and collaboration - found that links to the schema would solve two problems at once:

- Inability to **confidently track information** across years.
- Inability to **discern what new data is relevant** to the user.

Schemas play an essential role in 990 data: they are a guide to the field names and structure of the document. Sometimes these names or structures change from one year to the next. Being able to map those changes is crucial for consistent analysis of data across years and would save immense time and effort.

GivingTuesday notes that if the relevant version of the schema were to be provided in an index for each new 990 data release, economies of effort would be multiplied. **Thus, we urge the IRS to provide a new, immutable listing of filings for each new data release, with key information (form type, tax year, etc.) and a link to the schema used for that filing.** This would ensure that a user can easily and economically leverage newly released data, and have a clear means of tracking the location of information from one year to the next.

***2c. Ensure that schemas are complete and release historical versions.***

We commend the IRS for the release of the schema; however, given how essential schemas are for comprehending the underlying 990 data, we hope that the IRS will release *complete* schemas. Users are aware, for example, that 2022 had many more schemas than just the versions provided. Thus, the schemas on the new TEOS page are incomplete. We hope that, going forward, the IRS will provide schemas systematically and backfill the complete schemas for other years, as well. Posting historical versions of the schemas would go a long way towards reducing barriers to utilizing 990 data.

***2d. Make the new TEOS assets easier to find.***

In its analysis, GivingTuesday noticed that the only way an uninitiated user of the Tax Exempt Organization Search site can access the useful TEOS Improvements assets is through a link that reads, “Find more information on TEOS Improvements.” We suggest that you pull the links on the TEOS Improvements page onto the [main page](#) and help orient users toward these tools (e.g. “To access dataset guides, data dictionaries, schemas and more, see TEOS Improvements.”).

## ***2e. Provide an index to the URLs of 990 PDFs accessible via Tax Exempt Organization Search (TEOS)***

We are grateful that the IRS has provided public access to scanned and printable 990s through its website. Currently, these PDF files can be downloaded individually through TEOS (but see comments below regarding the fact that for Form 990 series, PDF bulk download, the individual zip links have been unavailable since February 2025). We note, however, that there is no way to link directly to the individual PDF files hosted by the IRS. The availability of an index file that links EIN and tax period to a URL, as it exists for XML filings, would facilitate the use of the files. A similar index for the PDF files would broaden access to these essential public records.

## ***2f. Appoint a 990 technical liaison within the IRS.***

Finally, the public would benefit from an IRS point person, or mechanism, for handling questions regarding the e-filed Form 990 data on IRS.gov. Currently, there is no procedure or contact for addressing questions regarding the data as they arise, separate from the Customer Account Services line, which addresses filing concerns. This is not only inefficient and frustrating for tax-exempt stakeholders, but it deprives the Service of feedback that could be used to make upgrades and corrections that are particularly important during the relatively early stages of the new e-filing/data release mandate.

## **3. Recommendation: Maintain a Regular 990 Release Schedule and Address Unavailable Files for 990s PDF Bulk Download**

Releases of e-filed 990 XML data have provided the public with a wealth of information, and we are pleased that the IRS has resumed releasing 990 XML data regularly. As described in the summary above, delays leave tax-exempt stakeholders in the dark, harming nonprofits, donors, and the public, all of whom rely upon this information to make funding, operational, and other general decisions, including those related to compliance.

However, since February 2025, for Form 990 series, PDFs in bulk, the individual zip links have been unavailable (see for example, [Form 990 series downloads – 2024 | Internal Revenue Service](#)). Such files are another important tool for tax-exempt compliance and analysis. Thus, we urge the IRS to address this gap, and resume the posting of these files.

Maintaining the consistent release of 990 data and forms allows the public to plan and use this data more efficiently. In addition to a release schedule that is consistently followed, the IRS should consider employing a format like the Exempt Organizations Business Master File page on the IRS website pertaining to the e-filed 990s. This page would recap release specifics, such as record counts and posting dates, provide contact information for questions, and serve other communications functions.

#### **4. Recommendation: Improve the Reporting of Government Revenue through Modifications to Part VIII of the Form 990 and Include EINs of Grants on Form 990-PF**

The government is one of the largest funders of nonprofit activity in the United States. In the current environment, information on government funding of the nonprofit sector is particularly relevant, both from a compliance and policymaking standpoint. In addition to tracking sources of revenue for individual nonprofits, it is vitally important to have a complete picture of the overall scope of government funding of the nonprofit sector, how this support has varied over the years, and what types of nonprofits and areas of the country are experiencing changes in this form of government support. Unfortunately, today, it is impossible to determine the extent and details of government revenue due to modifications made to the Form 990 in 2008.

Many prominent voices, including members of Congress, have expressed concern and a need for this information. During the last Congress, a bipartisan bill was introduced – [Nonprofit SEAT Act](#) - that would increase the clarity and utility of government revenue information on the Form 990. Independent Sector, a national membership organization of nonprofits, foundations, and corporate giving programs of every size and type, has endorsed this, and so has the National Council of Nonprofits, a network of state nonprofit associations across the country.

Notably, the [American Institute of Certified Public Accountants \(AICPA\)](#) also addressed the need for change in Part VIII of the Form 990 stating that “the reporting requirements with respect to governmental funding should be changed.” This statement was made in response to an IRS request for comments on reporting revenue from governmental units (see pg. 5 of AICPA comments in response to IRS Announcement 2011-36).

Despite numerous and long-standing calls for change, however, the Form 990 Part VIII Statement of Revenue continues to lack clarity with respect to the reporting of government revenue, confusing form users and likely resulting in inaccurate reporting.

In particular, two of the largest sources of government support to the nonprofit sector — voucher-type reimbursements such as Medicare and Medicaid, and government contracts — are combined with private payments for services. This is because, since 2008, the IRS has not required nonprofits to separately report Medicare, Medicaid, and other reimbursement payments from their revenue. These payments, which reach a broad array of nonprofits beyond hospitals, are now generally aggregated with other “program service revenue,” obscuring the largest form of government support to the nonprofit sector.

We understand that Medicare and Medicaid are captured for hospitals on Schedule H, Part III. However, this schedule is only for hospitals, and Medicare and particularly Medicaid are available to many other health and human service providers. As Congress considers prospective changes in government programs such as Medicare and Medicaid, transparent and proper reporting of how government funds are distributed and utilized across the nonprofit sector becomes more important.

Similarly, although government contracts are a major and common source of nonprofit revenue, they are not separated on the Form 990. This leads to additional confusion, particularly because

contracts may fall either under Part VIII, line 1e (government grants) if they benefit the public, or within Part VIII, section 2 (program service revenue) if the contract primarily benefits a government agency (see recommendation 4b). Nowhere on the form is the totality of government support reported. Nor can this totality be computed from elements of it that are reported, since some of the most sizable elements are buried. To avoid these problems, government revenue should be more clearly labeled and distinguished in the Form 990, as noted in the following proposed changes to the form:

***4a. Create a dedicated line for government reimbursements (e.g., Medicare/Medicaid and Contracts) in Part VIII, line 2a.***

As noted above, Medicare and Medicaid payments and other government reimbursements represent the largest source of government revenue to the nonprofit sector. However, the extent of these payments is now obscured due to changes to the Form 990 in 2008. Accounting for Medicaid and Medicare payments and other government reimbursements can be done without adding further lines to the form.

<b>Recommendation 4a: Clearly Label Government Revenue &amp; Modify Instructions</b>
Insert “Government Reimbursements (e.g. Medicare/Medicaid/and Contracts)” on existing line 2a of Part VIII of the current Form 990.
<b>Note: This change could be made without adding any further lines to the form since five (5) blank lines are already included on the existing form for organization to list their “program service revenue”</b>
The first sentence of the Form 990 Instructions, Part VIII, line 2, could be replaced with the following sentences:
If applicable, on line 2a enter any revenue received from government reimbursement programs such as Medicare or Medicaid, fees and contracts from government agencies that primarily benefit the agencies, and any other similar government payments. On lines 2b through 2e enter the organization’s four other largest sources of program service revenue.

***4b. Clarify the distinction between grants and contracts that benefit the public versus those payments that serve the needs of a governmental unit.***

Many in the nonprofit sector have difficulty distinguishing between grants and contracts that benefit the public versus those payments that serve the needs of a governmental unit. The [2015 Advisory Committee on Tax Exempt and Government Entities \(ACT\) report](#) highlighted this problem, finding that it can result in “inconsistent reporting among seemingly comparable organizations” as well as errors in the computation of some organizations’ public support tests on Schedule A (see pgs.136–137 of report). The AICPA also discusses the “inherent ambiguity” of this section in its 2011 comments. Given the significance of government revenue to the nonprofit sector, it is important that the IRS take steps to address this.

**Recommendation 4b: Clarify the Distinction Between Grants and Contracts that Benefit the Public Versus Those Payments that Serve the Needs of a Governmental Unit**

Clear up confusion regarding what constitutes government grants/contracts that are treated as contributions in line 1e by providing additional useful examples — beyond those listed in the current instructions to lines 1 and 2 — drawn from nonprofit experiences. Our organizations are happy to confer with nonprofits (such as Independent Sector, the National Council on Nonprofits, and state-level nonprofit associations, as well as associations of accountants) to determine typical use cases that would be most helpful to add to the instructions. In the meantime, possible examples might include:

- **Example 1:** A state department of social services enters a contract with a child welfare agency to provide a variety of services to children in need within the state. Since the contract benefits the public, not the government agency, it is considered a contribution and is reported on line 1e.
- **Example 2:** A government housing agency enters a contract with a nonprofit community development organization to construct moderate-income housing. The housing is for local residents, not government employees, so the funding should be noted as a contribution in line 1e.
- **Example 3:** A city council contracts with a nonprofit organization for services related to proper wastewater management at a city office building. Since the direct benefit of the funding is for the local government, not the public, it does not count as a contribution.
- **Example 4:** In a city, there are thousands of vacant government-held lots. The government provides a grant to a nonprofit to transform several of the vacant lots into community gardens. The grant should be considered a contribution on line 1e because the beneficiaries are community members who will use the garden.

***4c. Improve the Reporting of Grants Information by Adding EINs of Grantees to 990-PFs***

Philanthropy is a cornerstone of the U.S. tax-exempt sector. Beyond having detailed data on individual foundations and grantees (via Forms 990-PF and 990), the public would benefit greatly from having complete data on the entire funder-grantee network — including from private as well as public grantmakers. Such data advances compliance efforts and ensures public understanding of the flow of billions of dollars throughout the U.S. tax-exempt sector.

Currently, there is a disparity in the reporting of information by *public* foundations/grantmakers versus *private* foundations. Public foundations are required to report the names (and, importantly, the EINs) of their grantees on Schedule I of Form 990. The funder-grantee network for public foundations and their grantees can thus be easily discerned.

However, constructing equivalent information for private foundations and their grantees is difficult because private foundations are not required to provide the EIN of their grantees on Part XIV 3a and 3b of Form 990-PF.

We suggest requiring the reporting of grantees' EINs on *both* Forms 990 and 990-PF, making the forms consistent in this regard. Form 990-PF currently asks private foundations to provide the name and address of their grant recipient in Parts XIV 3a and 3b. We propose making this section equivalent to the Form 990 by asking private foundations to provide the EIN of their grant recipients in this section of the form, as well.

### **5. Recommendation: Continue the Valuable Work of Statistics of Income (SOI) Division with Respect to Tax-Exempt Organization Data Files, Including Publishing Revenue Transaction Files for 990-PFs 2017 -2019**

As the IRS states on its website, the Revenue Act of 1916 mandated the annual publication of statistics related to “the operations of the internal revenue laws” as they affect:

- Individuals
- All forms of businesses
- Estates
- Nonprofit organizations
- Trusts
- Investments abroad and foreign investments in the United States

The IRS Statistics of Income (SOI) division fulfills this function by collecting and processing data and sharing this information with other governmental bodies and the public.

The work of SOI is extremely valuable. For decades, SOI has collected microdata from a sample of filed Forms 990, 990-PF, and 990-EZ. The returns in the sample are subject to extensive cleaning, testing, research, and reallocation. The microdata files, which pull in several thousand data fields from Forms 990 and 990-PF, include the largest charities and private foundations. These files are made available to the public on the IRS website. In addition to downloading microdata files, users can access the SOI Bulletin, annual and time-series tables based on the Form 990-series, and other research publications.

The SOI tax-exempt data files remain an indispensable source of high-quality nonprofit data. While the release of e-filed Form 990 data under the Taxpayer First Act is of tremendous benefit to the public, there is still a need for the high-quality information that SOI researchers gather, analyze, and publish. We, therefore, express our support and appreciation for SOI's work and hope that the IRS will continue its support of the production and release of SOI's tax-exempt organization files, even as we point to gaps in the current files.

#### ***5a. Regularly publish revenue transaction files (RTFs) and provide missing RTFs of Form 990-PF returns processed in 2017, 2018, and 2019.***

Notwithstanding our strong support for the work of SOI, we wish to raise concerns regarding the annual Revenue Transaction File (RTF) extracts of Forms 990, 990-EZ, and 990-PF. This information has not only been critical for the basis of the New Consumer Classification System

“Core Files,” but it also has served, in the past, as the only available open source of data for 501(c) organizations that file by mail — the so-called “paper filers.”

The annual RTFs represent every 990, 990EZ, and 990-PF return processed by the IRS during the year. SOI-weighted samples normally lag RTF data by a full year and are based on a small number of organizations selected by size alone. SOI samples are mainly useful for national estimates but do not sufficiently account for different types of organizations or for regional, state, or local variations. Annual RTF extracts have become increasingly important to policy and research communities. Consequently, the reinstatement and consistent release of 990-PF RTFs is imperative to understanding a critical source of nonprofit funding representing \$1 trillion in assets.

We applaud the SOI division’s publication of Forms 990, 990-EZ, and 990-PF returns processed during 2020, 2021, 2022, 2023 and 2024. SOI’s stated commitment to finally publish Form 990-PF returns processed during the *prior* three calendar years remains unfulfilled. We strongly support and urge all efforts to close this gap of missing RTF extracts of Form 990-PF returns processed in 2017, 2018, and 2019. We cannot overstate the importance of such data to public understanding and oversight.

## **Conclusion**

The recommendations above reflect the thinking of noted tax-exempt organizations and practitioners, data experts and scholars on ways to enhance the quality, utility, and clarity of 990 information and reduce the burdens associated with accessing and using this important public dataset. We urge the Internal Revenue Service to address these important concerns.

Thank you for your consideration. Should you have any questions, please contact Cinthia Schuman Ottinger at [cinthia.schuman@aspeninstitute.org](mailto:cinthia.schuman@aspeninstitute.org).

Sincerely,

Aspen Institute’s Program on Philanthropy and Social Innovation

Candid

Charity Navigator

DataLake Nonprofit Research

Do Good Institute, University of Maryland

Dorothy A. Johnson Center for Philanthropy, Grand Valley State University

Independent Sector

Minnesota Council of Nonprofits

National Committee for Responsive Philanthropy

The Nonprofit Alliance

Elizabeth T. Boris

Jason Cluggish

Helen Flannery, Charity Reform Initiative of the Institute for Policy Studies\*

Brad Fulton, Indiana University\*

Karen Gano, Columbia University School of Professional Studies\*

Kirsten Gronbjerg

Teresa Harrison, Drexel University\*

Russell James, Texas Tech University\*

Jesse Lecy, Arizona State University\*

Brian Mittendorf, The Ohio State University\*

Pamela Paxton, University of Texas at Austin\*

Chris Prentice, University of North Carolina Wilmington\*

Eugene Steuerle

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