

Index

- ABA (American Bar Association), 4
- Accounting:
 defined, 35
 documentation needed, 36–37
 generally accepted accounting principles (GAAP), 38, 42–45
 importance of, 35–37
 methods of, 37–38, 45n10, 103, 107, 200n2, 236, 256
 professional standards, 38–42
- Acquisition indebtedness, 231, 232–233
- Activities outside United States, x, 8, 149–155
- Adjusted net income, 256
- Advertising and promotion, 93
- Advertising revenue, 245–246
- Affidavit, annual, 15–16
- Affiliate payments, 94
- Agency transactions, 41
- AICPA (American Institute of Certified Public accountants), 3
- AICPA Audit and Accounting Guide for Not-For-Profit Organizations, 38
- Alternative minimum tax, 235
- Amendments to return, 266–267
- American Bar Association (ABA), 4
- American Institute of Certified Public accountants (AICPA), 3
- Annual report filing, 11–12
- Annuities, charitable gift, 233
- Art, works of, 183–184
- Artifacts, 186
- Assets:
 dissolution of, 188–192
 distribution of, 189–190
 diversion of, 69
 fair market value of, 95
 gain/loss from, 258
 other assets, 143
 partial dissolution of, 191–192
 property, 183–186, 231–233
 restrictions on, 40
 valuation of, 189, 255
See also Form 990: Schedule N
- Auditing, x
- Balance sheet, 95–96, 265–266
See also Form 990: Part X
- Barter transactions, 251n97
- Bequests, 40
- Black Lung Trusts, 11
- Board members, 66–67
- Bonds, tax-exempt, 173–174, 191
See also Form 990: Schedule K
- Books and publications, 184
- Business, defined, 226
- Business income, 226
- Business transactions, defined, 180
- Capital gains/losses, 259–260, 267–268
- Charitable deduction, 238
- Charitable disbursements, 257
- Charitable programs, reporting of, 278–279
- Chart of required information, by organization type, 200
- Checklist of Required Schedules, x, 5, 6, 53–56
- Churches, 11, 12, 105
- Clothing items, 184
- Codes, 53
See also Internal Revenue Codes
- Collectibles, 185
- Collections, reporting of, 138
- Commissioner v. Groetzinger*, 250n68
- Community benefit standard, 160–161
- Compensation of disqualified persons, 254
- Compensation of officers, directors, and key employees, x, 73–81, 92
 background, 73–74
 deferral of, 172
 and National Football League, 18n11
 reasonableness of, 74, 170–172, 255, 262
 rebuttable presumption test, 72, 98n26
 reportable, 77
 reporting exceptions, 80–81
 reporting of, 277
 types of, 78–80, 172
See also Form 990: Part VII; Form 990: Schedule J
- Conservation contribution, qualified, 136, 184, 185
- Conservation easements, 133, 135–136, 182, 185
- Conservation purpose, 185, 203n94
- Consignment sales, 229
- Contributed services, 39
- Contributions, 183–187
 calculating value of, 59–60, 257–258
 defined, 38
de minimis, 87, 118, 157
 as expenses, 90–91, 264
 intellectual property, 60
 major gifts, 117–118
 noncash, 182–188, 203n87
 nonstandard, 187
 number of, 186
 qualified conservation, 136, 184, 185
quid pro quo, 59, 87, 156, 157

INDEX

- Contributions (*Continued*)
 - restrictions on, 40, 45n15
 - services, 39
 - token gifts, 62–63
 - types of, 38–40, 60
- Contributors, schedule of, 7, 120–125
- Contributors, substantial, 254, 273
- Control, defined, 196–197
- Convenience exception, 229, 249n26
- Cost allocations, 246–248
- Costs:
 - direct/variable and indirect/fixed, 36, 247
 - documentation of, 36–37
 - exempt function, 245
 - program service, 245
 - publication, 246
 - readership, 246
- Credit counseling organizations, 139

- Debt-financed property, income from, 231–233
- Deductions, 243–246, 258
- Delay in filing, 9–10
- De minimis* contribution, 87, 118, 157
- Depreciation expenses, 94–95, 237, 263
- Direct public support, 38
- Disaster assistance, 168, 169
- Disbursements, charitable, 257
- Disqualified persons, 74, 253
- Disqualified supporting organization, 98n17
- Distributable amount, 279–280
- Dividends, reporting of, 258
- Dividends-received deduction, 238
- Donated facilities, 39
- Donated goods exception, 229
- Donations. *See* Gifts
- Donative public charities, 104, 111–112
- Donor-advised funds (DAFs), 61–62, 118, 133–135, 202n46
- Donor advisor, defined, 134
- Donor-designated grants, 118
- Down payment assistance organizations, 139
- Drugs and medical supplies, 186

- Earned income, defined, 225
- Easements, 133–135
 - See also* Conservation easements; Facade easements
- Electioneering. *See* Lobbying
- Elliot Knitwear Profit Sharing Plan v. Commissioner*, 249n41
- Endowment funds, 140–141, 202n58
- E-Postcard, 13–14
- Excess business holdings, 61–62, 228, 254, 259
- Exchange function, 118
- Exchange revenues, 82, 83, 226
- Exchange transaction, 84
- Excise taxes, 11, 269–270, 275–276

- Exempt function revenues, 85
- Exempt organizations:
 - defined, 10
 - pending qualification, 12
 - retroactive recognition of, 12, 18n20
 - tax responsibilities of, 2
 - See also* Nonprofits
- Exempt purpose expenditures, 129
- Exempt status:
 - maintaining, xi, 270–275
 - qualification for, 1–2, 10–11
 - revocation of, 227–228
- Expenditures, 129, 261–264
 - See also* Expenses
- Expenditure test, 125
- Expenses:
 - depreciation, 94–95, 237, 263
 - direct/variable and indirect/fixed, 247
 - from exploited activities, 245, 250n84
 - occupancy/office, 93
 - shared, 244
 - travel, 94, 263–264
 - types of, 35–36, 88–95, 244–245
 - Type 1, 244
 - Type 2, 244
 - Type 3, 245, 250n84
 - from unrelated business activities, 244
- Exploitation rule, 237

- Facade easements, 138
- Facts and circumstances test, 113–114
- Fair market value (FMV), 156
- Federated campaigns, 83
- Fees, professional, 262
- Filing:
 - deadlines for, 13, 18n26
 - delay in, 9–10
 - electronic, 14–15
- Filing requirements, 11–13
- Financial statements, supplemental. *See* Form 990: Schedule D
- Financial statements and reporting, 97
 - See also* Form 990: Part XI
- FIN 48 footnote, 143, 202n60
- Fiscal year change, 13
- Food items, 186
- Foreign activity reporting, 149–155
- Foreign governments, defined, 151
- Foreign individuals, defined, 151
- Foreign organizations, defined, 151
- Form TD F 90-22.1, 57–58
- Form W-2, 12
- Form W-2G, 56, 57
- Form W-3, 12, 57
- Form 940, 57
- Form 941, 12, 57

INDEX

- Form 990:
 - accounting methods used, 37–38
 - “Core Form”, 5, 47–48
 - filing deadline for, 12
 - filing requirements, 11
 - June 2007 draft, 19–28
 - Part I, 6, 48–49
 - Part II, 6, 50
 - Part III, 6, 50–53
 - Part IV, x, 5, 6, 53–56
 - Part V, x, 6, 56–64
 - Part VI, 4, 6–7, 64–73
 - Part VII, x, 73–81
 - Part VIII, xi, 7, 40, 81–88
 - Part IX, xi, 7, 88–95
 - Part X, xi, 7, 95–96
 - Part XI, 7, 97
 - public inspection of, 16–17
 - purpose of, ix, 1–3
 - redesign, suggested, 29
 - revision of, ix–x, 3–8
 - Schedule A, 7, 8, 38, 103–120
 - new rules for, 103–104
 - Part I, 104–110
 - Part II, 110–115
 - Part III, 115–120
 - Part IV, 113, 115
 - types of public charities, 104–112
 - Schedule B, 7, 120–125
 - Schedule C, xi, 7, 125–132
 - Part I, 126–128
 - Part II, 128–130
 - Part III, 131–132
 - Part IV, 132
 - Schedule D, xi, 7, 40, 132–146
 - Part I, 133–135
 - Part II, 135–138
 - Part III, 138–139
 - Part IV, 139–140
 - Part V, 140–141
 - Part VI, 141
 - Part VII, 141–142
 - Part VIII, 142
 - Part IX, 143
 - Part X, 143–144
 - Part XI, 144
 - Part XII, 144–145
 - Part XIII, 145
 - Part XIV, 145–146
 - Schedule E, 7, 146–149
 - Schedule F, x, 8, 149–155
 - Schedule G, xi, 8, 84, 155–160
 - Schedule H, xi, 8, 160–165
 - Schedule I, x, 8, 165–169
 - Schedule J, 8, 170–172
 - Schedule K, xi, 8, 173–174
 - Schedule L, 8, 174–182
 - Part I, 175–177
 - Part II, 177–178
 - Part III, 178–179
 - Part IV, 179–182
 - Schedule M, x, 8, 85, 182–188
 - Part I, 183–187
 - Part II, 188–192
 - Schedule N, 8, 188–192
 - Schedule O, xi, 5, 8, 64, 192–195
 - Schedule R, 8, 195–200
 - Form 990-BL, 11
 - Form 990-EZ, x, 9–10, 11
 - public inspection of, 16–17
 - redesigned, sample, 30–33
 - Form 990-N, 11, 13–14
 - Form 990-PF, xi, 11, 253–288
 - change in accounting method, 37
 - corrections to, 266–267
 - expenditures, 261–264
 - order in which to complete parts, 255
 - Part I, 255–264
 - Part II, 265–266
 - Part III, 266–267
 - Part IV, 267–268
 - Part V, 268–269
 - Part VI, 269–270
 - Part VII, 270–276
 - Part VIII, 276–277
 - Part IX, 278–279
 - Part X, 279
 - Part XI, 279–280
 - Part XII, 280
 - Part XIII, 280–281
 - Part XIV, 282
 - Part XV, 282–285
 - Part XVI, 285–286
 - Part XVII, 286–287
 - public inspection of, 16–17
 - purpose of, 254–255
 - revenues, 257–261
 - terminology in, 253–254
 - Form 990-T, xi, 11, 57, 225–252
 - accounting methods and periods, 236
 - alternative minimum tax, 235
 - capital and nondeductibles, 237–238
 - charitable deduction, 238
 - chart of issues, 252
 - consolidated, 236
 - cost allocations, 246–248
 - deduction categories, 243–246
 - depreciation, 237
 - design, 238, 242–243
 - dividend deduction, 238
 - due date, 234
 - extension for, 234
 - interest and penalties, 235
 - inventory deduction, 237

INDEX

- Form 990-T (*Continued*)
 loss on, 236
 net operating loss (NOL), 238
 "Ordinary and necessary" criteria, 237
 payment of tax, 234
 profit motive, 237
 proxy tax, 235
 public inspection of, 16–17
 refund claim, 236
 schedules for, 243
 statute of limitations, 235–236
 tax credits, 235
 who must file, 233–234
- Form 1023, 10, 68, 113, 150
- Form 1024, 10
- Form 1041, 13, 64
- Form 1096, 56
- Form 1098, 56
- Form 1099, 12
- Form 1099-MISC, 56
- Form 1120, 13
- Form 1128, 13
- Form 3115, 37, 236, 256
- Form 4506A, 17
- Form 4720, 11, 131, 177, 281
- Form 4797, 231
- Form 5498, 56
- Form 5500, 11
- Form 5500-EZ, 11
- Form 5768, 11, 129
- Form 8282, 124, 182, 186
- Form 8283, 124, 182, 186
- Form 8868, 234
- Form 8886-T, 58
- Form 8899, 60, 182
- For-profit subsidiary payments, 231
- Foundation manager, defined, 254
- Fractional interest, 183–184
- Fragmentation rule, 227
- Functional expenses, 89–90
- Functional expenses, statement of,
 xi, 88–95
See also Form 990: Part IX
- Functionally integrated, defined, 110
- Fund accounting system, 37
- Fundraising, 63, 89–90
 definition of, 151
 and exempt function expenses, 245
 professional, 49
 revenue from, 42, 83–84, 87–88
 supplemental information on, 155–158
See also Form 990: Schedule G
- Future-use land, 231–232
- GAAP rules, compared to IRS rules, 42–45
- Gaming, 88, 158–160
See also Form 990: Schedule G
- GASB (Government Accounting Standards Board),
 45n13
- Generally accepted accounting principles (GAAP),
 38, 42–45
- Geographic regions, 151–152
- Gifted property, 233
- Gifts:
 calculating value of, 257–258
 as expenses, 90–91, 264
 in-kind, 119, 248, 251n97
 major, 117–118
 noncash, 85
 property, 233
 reportability of, 38–39
 token, 62–63
See also Contributions: noncash
- Good Governance Practices for 501(c)(3) Organizations*,
 65, 98n19
- Governance, Management, and Disclosures section,
 ix, 64–73
 background, 64–65
 board members, 66–67
 conflicts of interest, 71
 diversion of assets, 69
 documentation, 70
 ethics policies, 71
 management compensation, 72
 management outsourcing, 67–68
 member status and rights, 69
 organizational changes, 68
 public disclosure of documents, 73
 record retention policies, 71–72
 reportable ventures, 72
 review of Form 990, 70
 state requirements, 73
 subordinate organizations, 70
See also Form 990: Part VI
- Government Accounting Standards Board (GASB),
 45n13
- Government grants, defined, 84
- Grant making, defined, 150
- Grants:
 defined, 166
 disaster assistance, 168, 169
 domestic, 154
 donor-designated, 118
 as expenses, 90–91, 264
 foreign, 153
 future commitments of, 284–285
 government, 84
 minimizing discrimination in awarding, 166
 pass-through, 40, 118
 by private foundations (PFs), 282–285
 property as, 259
 reporting on Schedule I, 165–169
 reporting on Schedule L, 178–179
 as revenue, 85

INDEX

- for services, 118
- “unusual”, 114–115
- value of, determining, 167–168, 169, 257–258
- See also Form 990: Schedule I
- Greene County Med. Society Found. v. United States*, 249n20
- Gross income method for cost allocations, 247
- Gross sales, 260
- Group returns, 15–16, 18n31

- Historical treasures, 183
- Hospitals, 106, 160–165
 - See also Form 990: Schedule H
- Household goods, 184

- Income:
 - adjusted net income, 256
 - capital gains, 259–260
 - from debt-financed property, 231–233
 - earned/unearned, 225
 - interest, 258
 - investment, 86, 107, 255, 256, 258, 267–268
 - rental, 258
 - research, 230
 - royalties, 86, 93, 230
 - undistributed, 280–281
 - See also Revenue
- Income modifications, 260
- Income-producing activity, 285–286
- Independent Sector, 131
- Information technology expenses, 93
- Inherently public activity, 104
- In-kind gifts, 119, 248, 251n97
- Insurance contract, foundation interest in, 274–275
- Insurance expenses, 95
- Intangible recognition, 38
- Intellectual property, 182, 184
- Interested Parties by Part and Organization Type, 223
- Interest expenses, 94, 262–263
- Interest income, 258
- Intermediate sanctions, 74
- Internal Revenue Codes, 118
 - §119, 172
 - §132, 80, 172
 - §162, 237
 - §170, 150
 - §170(b), 105, 106, 108
 - §170(c), 125
 - §170(c)(4), 125
 - §170(o), 184
 - §183, 237
 - §263A, 246
 - §501(c)(3), 1, 2, 104, 168
 - classification of, 103–104
 - and compensation, 170
 - and contributions, 58
 - dissolution of assets, 189
 - dues payments, 82
 - and elections, 126–127
 - and employee compensation, 74
 - impact of new form on, xi
 - and intermediate sanctions, 175
 - and lobbying, 271
 - and political activity, 126, 131
 - qualification, xi, 10
 - retroactive recognition, 18n20
 - schedules for, 9
 - transactions with interested persons, 175
 - and unemployment tax, 57
- §501(c)(4), 126, 131, 246
- §501(c)(5), 131, 246
- §501(c)(6), 131, 246
- §501(c)(7), 125, 163
- §501(c)(8), 125, 163
- §501(c)(10), 163, 246
- §501(h), 129
- §509, 10
- §509(a)(1), 104, 107, 117, 118, 119, 120
- §509(a)(2), 105, 107, 117, 118, 119, 120
- §509(a)(3), 11, 105
- §509(a)(4), 105
- §512(b), 229–230
- §527, 126, 128
- §527(f)(3), 127
- §1221, 230
- §1231, 230
- §4912, 131
- §4941, 254
- §4942, 254, 281
- §4943, 254
- §4944, 254
- §4945, 254
- §4958, 172, 177
- §4967, 62
- Internal Revenue Service. See IRS
- International programs, 149–155
- Inurement, 74
- Inventory deduction, 237
- Inventory sales, 88
- Investment income, 86, 107, 255, 256, 258, 267–268
- Investments:
 - closely held stock, 184
 - dividends and interest on, 230
 - jeopardizing, 254
 - land, buildings, and equipment, 141
 - other securities, 141–142
 - program related (PRI), 142, 278–279
 - unrealized changes in, 40
- Iowa State Univ. of Science and Tech. v. Portland Golf Club v. Commissioner*, 250n74
- Iowa State Univ. of Science and Tech. v. United States*, 250n68, 250n79
- Irregular exception, 228

INDEX

- IRS (Internal Revenue Service), 3
 IRS rules, compared to GAAP rules, 42–45
- Jeopardizing investments, defined, 254
 Joint costs, 95
- Key employees, 77, 254
- The Law of Tax-Exempt Healthcare Organizations, 3rd Edition*, 161
- Legislation, defined, 126
- Lerner, Lois G., x, 4
- Liabilities, other, 143–144
- Life Cycle of a Public Charity, 65
- Life estate, 233
- Like, like, like rule, 74
- Lobbying, 125–132, 201n42
 defined, 126
 private foundations and, 271
 by public charities, 17n6
See also Form 990: Schedule C
- Maintaining offices, employees, or agents, defined, 151
- Management and general (M & G) expenses, 89
- Management costs, 37
- Mandatory payout, defined, 254
- Medical research, 106
- Meeting expenses, 94, 263–264
- Member benefit payments, 91–92
- Membership dues/fees, 83, 118
- Miller, Steven T., ix
- Minimum investment return, 279
- Mission, 51
- Motor vehicles, 184
- National College Athletic Ass'n v. Commissioner*, 914 F., 248n19
- Net operating loss (NOL), 238
- Non-cash contributions. *See* Contributions: non-cash; Form 990: Schedule M
- Noncharitable exempt organizations, 286–287
- Nondiscrimination policies of schools, 146–149, 202n63
- Non-employee service fees, 93
- Nonprofits:
 institutions that qualify as, 10–11
 tax responsibilities of, 2
See also Churches; Exempt organizations: Hospitals; Private foundations (PFs); Public charities; Schools; Social clubs
- Notice 2007–21, 133
- Occupancy expenses, 93
- Office expenses, 93
- Officer compensation, 73–81
- Officer information, 276–277
- Office space utilization charts, 36
- One-way receipts, 38
- Operational test, 174
- Orange County Agricultural Soc'y, Inc. v. Commissioner*, 90.1 USTC, 248n16
- “Ordinary and necessary” criteria, 237
- Organizational relationships, 196
- Organizational test, 73–74, 174
- Partnerships, 184, 198, 199
- Passive income modification, 229–230
- Pass-Through grants, 40, 118
- Patents, 182
- Penalties, 13, 18n18
- Pension Protection Act of 2006, 13–14, 109
- Permanent endowment funds, defined, 140
- Personal benefit contract, 60
- Planned Parenthood Federation of America v. Commissioner*, 249n28
- Pledges, 38–39, 63
- Political campaign and lobbying activities, 125–132
See also Form 990: Schedule C
- Political expenditure, correction of, 127
- Political expenses, defined, 126
- Portland Golf Club v. Commissioner*, 250n68
- Private foundations (PFs):
 charitable program reporting, 278–279
 definition of, 253
 and excess business holdings, 61
 filing requirements, 11
 income and, 256–257
 ongoing tax-exempt status, 270–275
 reports unique to, 268
 termination of, 272
See also Form 990-PF
- Private operating foundations, 282
- Prize winnings, 57
See also Form 990: Part V
- Profit motive, 237
- Program-related investments (PRIs), 278–279
- Program service revenues, 85, 89
- Program services, defined, 151
- Prohibited tax shelter, 58
- Project allocations, 36
- Property:
 debt-financed, 231–233
 gains from sale of, 230–231
 gifted, 233
 types of, 183–186
See also Assets
- Proxy tax, 235, 249n58
- Publication costs, 246
- Public charities:
 donative, 104, 111–112
 life cycle of, 65
 service-providing, 105, 115–120
 types of, 104–112

INDEX

- Public charity status, 10–11, 103–120
See also Form 990: Schedule A
- Public inspection, 16–17
- Public status problems, 119–120
- Public support calculation, 111–112
- Public support percentage, 115
- Public support test, 107–108
- Qualified conservation contribution, 136, 184, 185
- Qualified real property interest, 136, 184–185
- Qualifying distributions, 280
- Quasi-endowment funds, defined, 140
- Quid pro quo* contribution, 59, 87, 156, 157
- Readership costs, 246
- Real estate, 185
- Reconciliation of assets/revenue/expenses, 144–145
- Related activity, 226
- Related organizations, 84, 195–200
- Relationships, organizational, 196
- Rensselaer Polytechnic Institute v. Commissioner*, 251n94
- Rental income, 230, 258
- Rents, gross, 86
- Required information chart, 200
- Research income, 230
- Revenue:
 advertising, 245–246
 exchange, 82, 83, 226
 exempt function, 85
 Form 990-PF, 257–261
 fundraising, 245
 program service, 85
 reporting of, 52
 statement of, xi, 81–88
 support test for reporting, 107–108
 types of, 83–88
See also Form 990: Part VIII; Income
- Royalties, 86, 93, 230
- Rules, GAAP vs. IRS, 42–45
- Salary allocation system, 36
- Sale of property, gains from, 230–231
- Sanctions, 275–276, 287n1
- Sarbanes-Oxley Act, 65, 71, 72
- Schedules, *see specific form number*
- Schedules, checklist of required, 53–56
- Schools, 12, 105, 146–149
See also Form 990: Schedule E
- Scientific specimens, 186
- Securities, 184
- Self-dealing, defined, 254
- Service-providing public charities, 105, 115–120
- Set-asides, 280
- SFAS No. 116, 38–40, 138–139, 248, 251n97
- SFAS No. 117, 40, 140
- SFAS No. 124, 41, 258
- SFAS No. 136, 41
- Shiloh Youth Revival Ctrs. v. Commissioner*, 249n22
- Sierra Club v. Commissioner*, 249n28
- Sixty-month termination, 120
- Social clubs, 63, 231
- Southwest Tex. Electric Coop., Inc. v. Commissioner*, 249n42
- Sponsoring organization, defined, 134
- Sponsorship, 84, 99n39
- Statement of Activity, 41
- Statement of Functional Expenses, 88–95
- Statement of Position 94–3, 41
- Statement of Position 98–2, 41–42
- Statement of Program Service Accomplishments, 6, 50–53
- Statement of Revenue, 81–88
See also Form 990: Part VIII
- Stock, closely held, 184
- Substantial contributor, 254, 273
- Substantial part test, 131
- Suffolk County Patrolmen's Benevolent Ass'n Inc. v. Commissioner*, 77 T.C., 248n19
- Supplemental financial statements, 132–146
See also Form 990: Schedule D
- Supplemental information, 282–285
- Schedule D, 145–146
- Schedule F, 154
- Schedule M, 188–192
See also Form 990: Schedule O
- Support, defined, 117
- Support, public/private, 111, 115
- Supporting organizations (SOs), 61, 105, 109–110
- Support test, 107–108
- Sweat test, 226
- Tax:
 exceptions and modifications from, 228–231
 excise, 11, 269–270, 275–276
 proxy, 235
- Taxable distribution, defined, 62
- Taxable expenditure, defined, 254
- Tax accounting methods. *See* Accounting:
 methods of
- Tax compliance, 56–64
- Tax credits, 235
- Tax-exempt bonds, 173–174
See also Form 990: Schedule K
- Tax exemption, ongoing qualification for, 270–275
- Taxidermy property, 186, 203n96
- Tax rate, reducing, 268–269
- Tax reporting, of private foundations, 263
- Tax shelter, prohibited, 58
- Term endowment funds, defined, 140
- Texas Farm Bureau v. United States*, 249n28
- Thresholds, financial, x, 5, 53–56, 181
- Trade, defined, 226

INDEX

- Transactions with Interested Parties Questionnaire, 100–101
- Transactions with interested persons, 174–182
 - business transactions, 179–182
 - correction of, 177
 - interested parties list, 176–177, 178, 179, 180
- Transparency in reporting, 4–5
- Travel expenses, 94, 263–264
- Trusts, 184, 198, 234
- Types of property, 183–186

- Undistributed income, 280–281
- Unearned income, defined, 225
- Unified Registration Statement (URS), 157, 204–206
 - distribution sites for, 222
 - initial registrations checklist, 221
 - state-by-state appendix, 207–220
- United States, defined, 150

- United States v. American Bar Endowment*, 250n84
- Unrelated business income tax (UBIT), 225
- Unrelated business income (UBI):
 - consequences of earning, 227
 - defined, 226
 - earned income and, 225
 - exceptions and modifications from, 228–231
 - income from debt-financed property, 231–233
 - limits on, 272, 288n32
- Unrelated income tax, payment of, 227
- “Unusual” grant, 114–115

- Volunteer exception, 228–229
- Voting rights of board members, 66–67

- Waco Lodge No. 166, Benevolent & Protective Order of Elks v. Commissioner*, 249n21
- West Va. Med. Ass’n v. Commissioner*, 250n86