

Center on Nonprofits and Philanthropy



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- Human services organizations account for the largest share of revoked organizations, followed by public and societal benefit organizations and arts organizations.
- The District of Columbia had the largest share of nonprofits lose their tax-exempt status; lowa had the smallest.

Revoked: A Snapshot of Organizations That Lost Their Tax-Exempt Status

Amy S. Blackwood and Katie L. Roeger

Over 275,000 nonprofit organizations have lost their tax-exempt status for failing to file an information return with the IRS in the last three years. This represents 16 percent of the entire nonprofit sector in the United States. Using the first ever published Nonfiler Automatic Revocation List¹ released by the Internal Revenue Service (IRS) on June 8, 2011, we provide a snapshot of the organizations that have lost their tax-exempt status and examine these organizations by type, age, and location.

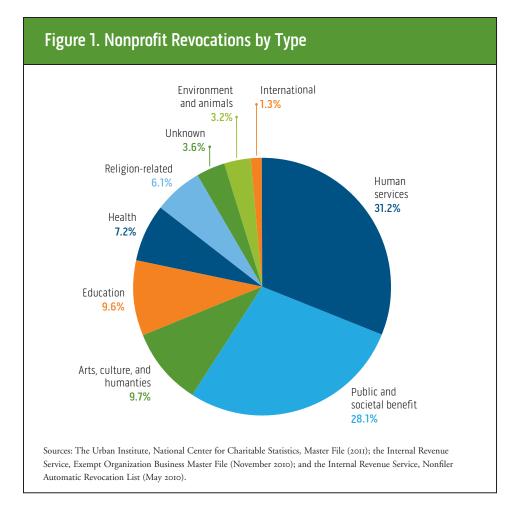
he large number of revocations stems from enactment of the Pension Protection Act of 2006, which mandated that nonprofits with less than \$25,000 in annual gross receipts file a new Form 990-N, also known as the e-Postcard. Previously, these smaller organizations had no reporting responsibilities to the IRS; it was unclear how many of them were still operational and how many of them had become defunct. The Pension Protection Act aimed to address this issue by requiring nonprofits to file an information return, whether it be a Form 990-N, 990-EZ, or 990, and calling for immediate and mandatory revocation of tax-exempt status for all nonprofits that failed to file a return for three consecutive years.2 Organizations had until October 15, 2010, to file or face revocation.3

Revocations by Type of Organization

Human services organizations account for the largest percentage of revoked organizations (31 percent) followed by public and societal benefit organizations 4 (28 percent) and arts organizations (10 percent, as shown in figure 1).

• Human services organizations: Recreation and sports clubs, including hobby clubs, country clubs, and amateur sports leagues account for over a third of human service revocations. Traditional human service organizations, offering a range of services including neighborhood community service centers, community services offered in conjunction with a religious organization, and centers that support the independence of those with special needs, account for a quarter of the human services revocations.

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- Public and societal benefit organizations:
 Community and neighborhood development organizations like neighborhood coalitions, community action agencies, and neighborhood block associations, along with community improvement and community service clubs like Kiwanis or Jaycees, account for 35 percent of public and societal benefit organizations that were revoked. More than 8,000 military and veterans' organizations were revoked, including chapters of the American Legion and American Ex-Prisoners of War.
- Arts organizations: Nearly a third of all arts organizations revocations were performing arts related, with the majority being theatre groups. Cultural and ethnic awareness organizations were also affected: over 4,500

of these organizations (17 percent of affected arts organizations) were revoked. These nonprofits promote artistic expression within a particular ethnic community; preserve traditions, values, and lifestyles of different cultural groups; and educate the public through activities and events.

How do these revocations affect the non-profit landscape? Looking at the overall effect of these revocations by type of organization, with a few exceptions, each type declined somewhere between 12 and 20 percent (table 1). Human services and arts and culture organizations have the largest declines at 20 percent. Religious organizations have the smallest decline—7 percent. Education organizations also have a smaller than average decline at 12 percent.

Revocations by Age

Over 60 percent of organizations that were created before 1950 had their status revoked, but nonprofits of all ages appeared on the revocation list. In fact, organizations that had registered in the past 20 years accounted for nearly 50 percent of all revocations (table 2).

Revocations by State

These new filing regulations affected non-profits across the United States. On average, 15 percent of organizations in each state were revoked, but some states had a greater proportion of nonprofits lose their tax-exempt status than others (table 3, page 4). The District of Columbia had the largest proportion of non-profits lose their tax-exempt status, with 23 percent of nonprofits revoked. Utah had the next-highest percentage at 20 percent. Iowa had the smallest proportion of nonprofits lose their tax-exempt status: 9 percent.

Conclusion

While it may be tempting to attribute the failing of these organizations to the recession, it is more likely that these organizations have been out of operation for many years. In fact, more than a quarter of all organizations whose exempt status was revoked last appeared in the IRS Business Master File before 2007, and only 10 percent of organizations that lost their tax-exempt status filed a financial return (Form 990 or Form 990-EZ) during their lifespan.

Some organizations whose status has been revoked are likely still operating; only time will tell how many. IRS efforts to communicate the new requirements were extraordinary, with multiple mailings to addresses on file, public announcements on TV and the radio, pamphlets in libraries, and many public presentations. This coupled with the fact that the vast majority of these organizations have never filed an information return and many of them have not appeared in the IRS Business Master File for four years lead us to believe that most of

Table 1. Revocations by Type

TYPE OF ORGANIZATION	Number of revoked organizations	Percent of revoked organizations	All nonprofits	Percent revoked by type
Arts, culture, and humanities	26,991	10	137,779	20
Education	26,870	10	225,119	12
Environment and animals	9,079	3	62,340	15
Health	20,135	7	111,254	18
Human services	87,167	31	444,296	20
International	3,617	1	21,999	16
Public and societal benefit	78,665	28	483,166	16
Religion-related	16,930	6	241,360	7
Unknown	10,145	4	28,777	35
Total	279,599	100	1,756,090	16

Sources: The Urban Institute, National Center for Charitable Statistics, Master File (2011); the Internal Revenue Service, Exempt Organization Business Master File (November 2010); and the Internal Revenue Service, Nonfiler Automatic Revocation List (May 2010).

Table 2. Revocations by Founding Year

FOUNDING YEAR	Number of revoked organizations	Percent of revoked organizations	All nonprofits	Percent revoked by founding year
Before 1950	15,088	5	23,675	64
1950-59	6,227	2	182,135	3
1960–69	14,142	5	75,226	19
1970–79	25,967	9	155,752	17
1980–89	61,155	22	198,468	31
1990–99	67,294	24	239,239	28
2000-07	65,975	24	343,899	19
Unknown	23,751	8	537,696	4
Total	279,599	100	1,756,090	16

Sources: The Urban Institute, National Center for Charitable Statistics, Master File (2011); the Internal Revenue Service, Exempt Organization Business Master File (November 2010); and the Internal Revenue Service, Nonfiler Automatic Revocation List (May 2010).

Table 3. Revocations by State

STATE	Number of revoked organizations	All nonprofits	Percent revol
Alabama	3,460	23,319	15
Alaska	898	5,895	15
Arizona	4,025	25,901	16
Arkansas	2,557	15,898	16
California	33,734	184,880	18
Colorado	5,139	32,532	16
Connecticut	3,332	23,011	14
Delaware	852	6,575	13
District of Columbia	3,879	17,014	23
Florida	13,903	84,282	16
	7,655	43,854	17
Georgia			
Hawaii	1,525	8,764	17
Idaho	1,407	8,709	16
Illinois	13,218	75,195	18
Indiana	6,152	40,536	15
lowa	2,952	31,974	9
Kansas	3,003	20,282	15
Kentucky	3,180	21,314	15
Louisiana	4,222	22,471	19
Maine	1,323	10,331	13
Maryland	6,196	37,034	17
Massachusetts	6,877	42,052	16
Michigan	8,932	55,473	16
Minnesota	5,130	38,191	13
Mississippi	2,233	14,639	15
Missouri	6,222	40,538	15
Montana	1,241	10,927	11
Nebraska	1,672	14,445	12
Nevada			15
	1,748	11,576	
New Hampshire	1,175	9,019	13
New Jersey	7,877	48,463	16
New Mexico	2,201	11,916	18
New York	19,408	114,488	17
North Carolina	6,363	47,938	13
North Dakota	767	6,599	12
Ohio	10,645	73,386	15
Oklahoma	3,857	22,083	17
Oregon	3,733	25,377	15
Pennsylvania	10,492	74,356	14
Rhode Island	1,031	8,875	12
South Carolina	3,047	23,969	13
South Dakota	889	7,617	12
Tennessee	4,474	33,168	13
Texas	21,468	117,050	18
Utah	1,990	10,196	20
Vermont	913	6,777	13
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Virginia Washington	6,274	45,384	14
Washington	7,189	40,932	18
West Virginia	1,989	12,417	16
Wisconsin	5,131	38,903	13
Wyoming	664	5,077	13
Outside the United St	ates ^a 1,355	4,488	30
Total	279,599	1,756,090	16

Sources: The Urban Institute, National Center for Charitable Statistics, Master File (2011); the Internal Revenue Service, Exempt Organization Business Master File (Nov. 2010); and the Internal Revenue Service, Nonfiler Automatic Revocation List (May 2010).

these organizations are, in fact, defunct and have been for several years.

Losing tax-exempt status can be detrimental for an operating nonprofit. Everyone involved with small nonprofits should go to the Nonfiler Automatic Revocation List published by the IRS at http://www.irs.gov/charities/article/o,,id=236554,00.html to make certain that the organization has not lost its status. If an organization's status has been revoked, taxes and donations made to the organization will no longer be tax deductible. Donations made to organizations before revocation remain tax deductible. To have tax-exempt status reinstated, organizations will need to reapply. The IRS announced transition relief for certain small tax-exempt organizations—those with annual gross receipts in 2010 of \$50,000 or less-to regain their tax-exempt status retroactive to the date of revocation and pay a reduced application fee of \$100 rather than the typical \$400 or \$850 fee. Full details are available on the IRS web site, see link above.

Notes

- The Nonfiler Automatic Revocation List will be updated monthly. See http://www.irs.gov/ charities/article/o,,id=236554,00.html for more information.
- Organizations included in a group return, churches and their integrated auxiliaries, and conventions or associations of churches are not required to file.
- 3. The original filing deadline was May 17, 2010. However, given the large number of organizations yet to file by that date, the IRS extended the deadline to October 15, 2010.
- 4. The public and societal benefit category includes civil rights groups, social action and advocacy organizations, community improvement and capacity-building organizations, philanthropic groups, voluntarism and grantmaking foundations, science and technology organizations, social science organizations, military and veterans' organizations, public utility organizations, consumer protections organizations, pension plans, and cemeteries.

a. Foreign charities registered with the IRS.

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The Center on Nonprofits and Philanthropy conducts and disseminates research on the role and impact of nonprofit organizations and philanthropy. The Center's mission is to promote understanding of civil society and improve nonprofit sector performance through rigorous research, clear analysis, and informed policy. The National Center for Charitable Statistics (NCCS) is a program of the Center.

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