The Growth of Nonprofits

Michael L. Jones
Bridgewater State College, m3jones@bridgew.edu

Recommended Citation
Available at: http://vc.bridgew.edu/br_rev/vol25/iss1/8

This item is available as part of Virtual Commons, the open-access institutional repository of Bridgewater State University, Bridgewater, Massachusetts.
reflectIoNs oN a fulbrIGht year IN bahraIN

PHILIP TABAKOW

exciting possibilities for interdisciplinary collaborations
the BSC community, as well as to exploring the many
forward to sharing the rewards of my experiences with
the Fulbright teaching experience so satisfying. I look
learning with students from another culture that makes
try to use our broken Arabic). In the end, it is the unique
have to bring to them, and so eager to share their own
dents who are so welcoming, so interested in what we
had the chance to work with the many Bahraini stu
satisfying year for my wife and me at the University of
nities have made this an exciting and professionally
These varied teaching, research, and service opportu-
program in relation to comparable U.S. and Middle
UOB Department of English Language and Literature's
was hosted by the American University of Beirut. In a
first International American Studies Conference ever
to be held in the Middle East in December 2005, which
hosted by the American University of Beirut. In a
related context (as part of the department’s eventual
goal of gaining international accreditation), I have also
submitted a report evaluating the curriculum of the
UOB Department of English Language and Literature’s
program in relation to comparable U.S. and Middle
Eastern programs.

These varied teaching, research, and service opportu-
nities have made this an exciting and professionally
satisfying year for my wife and me at the University of
Bahrain. And it has been especially rewarding to have
had the chance to work with the many Bahraini stu-
dents who are so welcoming, so interested in what we
have to bring to them, and so eager to share their own
culture with us (though they do smile politely when we
try to use our broken Arabic). In the end, it is the unique
opportunity to build relationships of trust and mutual
learning with students from another culture that makes the
Fulbright teaching experience so satisfying. I look
forward to sharing the rewards of my experiences with
the BSC community, as well as to exploring the many
exciting possibilities for interdisciplinary collaborations
with colleagues throughout the college.

——Philip Tabakow is Associate Professor of English.

The Growth of Nonprofits:
A Reality Check

Michael L. Jones

Wouldn’t it be nice to keep all of your income rather
than giving up some of it to the government in the form
of taxes? You can’t legally get out of your responsibility
to pay taxes, but there are organizations often referred
to as “nonprofits” in the economy that are free from
paying taxes. The Internal Revenue Service (IRS) calls
them Exempt Organizations since they are exempt
from paying most types of taxes. You have probably
encountered one or more of these nonprofits recently.
Organizations such as churches, the Boy Scouts, the
Campfire Girls, your local museum and the public li-
brary are likely to be nonprofits. So how many nonprof-
its are there in this country? First consider how many
nonprofits might exist nearby. Perhaps you would guess
there are about a thousand nonprofits in your state. If
your state is somewhat representative of the remainder
of the states than there would be approximately 50
times a thousand or 50,000 nonprofits in the country.
You would be underestimating by a very large amount!
The IRS granted tax exempt status to 53,086 organiza-
tions in 2003 alone. There are currently over 1.4 million
tax exempt organizations in this country at this time
according to the database kept by the IRS (not including
many churches).

Nonprofits are organizations that are formed with the
intention of providing some good or service without
the promise of monetary rewards like a private business
corporation. Organizations intent on making the owner
or owners rich are considered “for-profits.” It seems
counter to economic theory but the question is how
someone would create a nonprofit organization since the motivation of finan-
cial reward has been removed. However, there are other
things besides wealth creation motivating some people
(apparently) since many nonprofits are created each
year. Their motivation is to provide goods or services
for people in the hopes of improving their community.
At least that is the intention of the laws governing and
authorizing the operations of nonprofits. These laws
are generally focused on allowing the nonprofit to forgo
paying business or income taxes since they are expected
to be performing a public service. Thus, as you can
imagine taxes play a very important role in the creation
of a nonprofit.

Even long before this country had an income tax there
were those who provided for the public good with
private wealth. The people were usually the extremely
wealthy such as Andrew Carnegie. Carnegie, upon
retirement at the beginning of the 1900’s, decided
to dedicate his time to spending his great wealth on
projects he considered important to the public welfare.
He wrote about his motivation in a document that
became known as his “Gospel of Wealth” (Carnegie,
1889) where he discussed the three options people like
him have in disposing of excess wealth. One could leave
the wealth to family, which he considered to be a huge
mistake. A better solution was to bequests the wealth
for specific public purposes after the person died, but he
considered this option disgraceful. The best option was
to use the wealth for the greater good during the life
of the possessor. To this end Andrew Carnegie created a
foundation to administer the use of his great wealth for
purposes he deemed important in solving the problems
between rich and poor and return his wealth to the
“mass of their fellows in the forms best calculated to do
them lasting good.” Such an organization today would
be exempt from paying income taxes on gains made by
investing the wealth so long as the organization pro-
vided an adequate amount of goods or services for the
benefit of the public and no individual owns or benefits
from those investment returns. Of course Carnegie’s
motivation might not have been totally unrelated to
taxes. The first exemption from income taxes was
instituted in the first federal income tax rules under
the Tariff Act of 1894. Carnegie wrote his opinion essay
on wealth in 1899, just five years before. He would have
very likely been involved in discussions among
the politicians and wealthy in this country debating
the need for taxation to provide for expanded govern-
ment funding.

In addition to being exempt from taxes, some nonprof-
its (not all) also get an additional special consideration
from our system regarding taxes. Some nonprofits,
often known as charities, can receive contributions and
the contributors gets a tax deduction for the gift.

The Dilmun excavations. —Philip Tabakow is Associate Professor of English.
This tax deduction reduces the contributor’s taxable in-
come and thereby reduces the amount of taxes they pay.
This tax deduction creates an incentive for people to give to charities. It has the added effect of lower tax revenues needed to
taxpayers for public goods and services coming from the gov-
ernment. This arrangement has the effect of empower-
ing individuals with the ability to choose which public goods and services they want to be funded. People who
like the programs offered by the government will simply pay
their taxes. People who want their tax money spent
on programs provided by nonprofits (charities) will
withhold their taxes from the government by giving it
directly to the nonprofits. However, those people will have to contribute a greater amount to the nonprofit to
get the full impact of their taxes since their tax deduc-
tion will only reduce their taxes by a percentage accord-
ing to their income level. So the incentives influencing charitable giving are complicated but involve avoid-
ing taxes, controlling the types of goods and services, controlling who provides the goods and services, and altruism, the desire to help others.

The most common legal form of nonprofit organiza-
tion is known as a 501(c)(3). This number refers to the section of the IRS code that defines the rules for the
nonprofit. There are actually many other 501(c) sections of the IRS code defining nonprofits as shown below:

1. Gov Instrumentality
2. Title-Issuing Corp
4. Civic, Employee Assoc, Social Welfare
5. Agricultural, Horticultural, Labor
6. Trade Board, Business League, C. of C.
7. Real Estate Board
8. Social, Recreational, Pleasure
9. Fraternal Beneficiary
10. Voluntary Employees Beneficiary (non-gov)
11. Women's Group
12. Life Ins, Mutual, Ditch, Mutual Telephone
13. Burial, Cemetery
14. Credit Union, Other Mutual Corp
15. Mutual Insurance (non-life or marine)
16. Crop Financing Corp
17. Unemployment Trust
18. Employer-Funded Pension
19. War Veteran Orgs
20. Legal Service Org
21. Black Lung Trust
22. Veteran Aids (pre 1900)
23. Trust (48/49 IRC)
24. Title Holding for Pension
25. High Risk Health Ins (State-sponsored)
26. Workers' Comp Reinsurance (State-sponsored)
27. Aeronautic and Religious Org (501(d))
28. Hospital Service (501(c))
29. Service Organization (Educ Org 501(f))
30. Child Care Org
31. Charitable Use Pool
32. Not defined in handbook

The determination of being exempt from taxes de-
pends on which section of the code the organization is
best characterized. The most common type of exempt
organization is the 501(c)(3) nonprofit entity. Data from the Internal Revenue Service's Exempt Organizations
Master Listing from 2005 will serve as the basis for this study.

According to these data there are more than one million
nonprofits in existence. The number of nonprofits obtaining exempt status has been increasing dramatical-
ly. At the turn of the century, when Andrew Carnegie
created his foundation, the number of nonprofits was
very small. As Figure 1 shows, the number of new non-
profits per year was about 20,000 in the late 1960s and
thirty years later in the 1990’s there were almost 50,000
new nonprofits created each year.

If we allow for a reasonable amount of variability there appears to be several distinct periods of stability in the
entry of new nonprofits organizations. In other words there are periods of time where the number of new nonprofits per year remained relatively constant.
The first period was the pre World War II period. During that period there were very few new nonprofits added
per year. The second period is the post World War II, or early Cold War period, where approximately 10,000
new nonprofits made their entry into the economy. The third observable period begins with the Vietnam War
and continues until the end of the Cold War. Marked by civil unrest and major changes in social conditions
within the United States, this period experienced a doubling of the number of new nonprofits per year to
around 19,000. Most of the century divided into these three periods of relatively constant growth. However, in the latter part of the decade a new trend appeared. Starting around 1995 the number of new nonprofits per year increased every year. The rate jumped to almost 50,000
per year by 2000. Recall that the previous constant
trend was only 20,000 per year. Within approximately
ten years from the end of the Cold War the number of new nonprofits per year more than doubled. During the same time period the U.S. economy experienced the longest economic expansion in its history.

For much of the century the new nonprofits each
year were almost split evenly between organizations
qualifying for deductible contributions and those
not qualifying for deductible contributions. The share of organizations qualifying for deductions was slightly greater than those not qualifying. However, the share of new nonprofits per year qualifying for deductible contributions has been increasing since the late 1970s. Figure 2 shows the growth of those organizations seeking and obtain-
ing deductibility status.

However, new nonprofits not qualifying for
deductible contributions have remained fairly constant for long periods of time as seen in Figure 3.
Deductibility was clearly a desirable objective for organizations being created.

While there are just under 130,000 nonprofits that are not categorized as a 501(c)(3) organization and still qualify for tax deductible contributions, this represents a small fraction (15 percent) of the 1.4
million nonprofits in existence. The vast majority
of nonprofits approved to receive tax deductible
contributions are categorized in subsection 5 of
section 501(c) of the IRS code.

In order to maintain an organization’s tax exempt and
deductibility status they must continue to operate under the conditions described at the time of
their ruling date. If the structure of the organiza-
tion changes in ways that the operations could benefit certain individuals, it could lead to a loss in exempt status. Therefore the managerial hier-
archy is important as well as forms of compensa-
tion if they exist. In addition, for organizations
receiving contributions that are tax deductible
the source of annual revenues and how these are translated into final products are of major impor-
tance. There are not enough individuals with
Andrew Carnegie’s wealth to account for the large
numbers of new nonprofits, so an examination of the
type of organization as it relates to funding is
next.

Up to the late 1960s the mixture of organiza-
tion types varied widely. However, starting around 1970 the variability declines and a pattern emerges. Organizations with substantial gov-
ernment funding or general public support and organizations with minor investment funding and
substantial general public support appear to cap-
ture the majority share of new nonprofits per year.
These two types of organizations share one criti-
cal characteristic: they obtain substantial funding support from the general public. The combined
shares of these two types of organizations appears

Figure 1: New Organizations Per Year

Figure 2: Contributions are Deductible

Figure 3: Contributions are Not Deductible
This tax deduction reduces the contributor’s taxable income and thereby reduces the amount of taxes they pay. This creates an incentive for people to give to charities. It has had the added effect of lowering tax revenues needed to pay for public goods and services coming from the government. This arrangement has the effect of empowering individuals with the ability to choose which public goods and services they want to be funded. People who like the programs offered by the government will simply pay their taxes. People who want their tax money spent on programs provided by nonprofits (charities) will withhold their taxes from the government by giving it directly to the nonprofits. However, those people will have to contribute a greater amount to the nonprofit to get the full impact of their taxes since their tax deduction will only reduce their taxes by a percentage according to their income level. So the incentives influencing charitable giving are complicated but involve avoiding taxes, controlling the types of goods and services, controlling who provides the goods and services, and altruism, the desire to help others.

The most common legal form of nonprofit organization is known as a 501(c)(3). This number refers to the section of the IRS code that defines the rules for the nonprofit. There are actually many other 501(c) sections of the IRS code defining nonprofits as shown below:

- 1) Gov Instrumentality
- 2) Title-Holding Corp
- 4) Agricultural, Horticultural, Labor
- 5) Trade Board, Business League, C of C, Real Estate Board
- 6) Social, Recreational, Pleasure
- 7) Fraternal Beneficiary
- 8) Voluntary Employees Beneficiary (non-gov)
- 9) Employees Beneficiary (gov)
- 10) Reviewing
- 11) Life Ins, Mutual Ditch, Mutual Telephone
- 12) Credit Union, Other Mutual Coop
- 13) Mutual Insurance (non-life or marine)
- 14) Crop Financing Corp
- 15) Unemployment Trust
- 16) Employer-Pension Trust
- 17) War Veteran Orgs
- 18) Legal Service Org
- 19) Black Lung Trust
- 20) Veteran Augt (rev 1500)
- 21) Trust (4849 EIRSA)
- 22) Title Holding for Pension
- 23) High Risk Health Ins (State-sponsored)
- 24) Workers’ Comp Reinsurance (State-sponsored)
- 25) Apomonic and Religious Org (501(d))
- 26) Hospital Corp (501(c))
- 27) Corporation of Educ Org (501(f))
- 28) Child Care Org
- 29) Charitable Risk Pool

The determination of being exempt from taxes depends on which section of the code the organization is best characterized. The most common type of exempt organization is the 501(c)(3) nonprofit entity. Data from the Internal Revenue Service’s Exempt Organizations Master Listing from 2005 will serve as the basis for this study.

According to these data there are more than one million nonprofits in existence. The number of new nonprofits obtaining exempt status has been increasing dramatically. At the turn of the century, when Andrew Carnegie created his foundation, the number of nonprofits was very small. As Figure 1 shows, the number of new nonprofits per year was about 20,000 in the late 1960s and thirty years later in the 1990’s there were almost 50,000 new nonprofits created each year.

If we allow for a reasonable amount of variability there appears to be several distinct periods of stability in the entry of new nonprofits organizations. In other words there are periods of time where the number of new nonprofits per year remained relatively constant. The first period was the pre World War II period. During that period there were very few new nonprofits added per year. The second period is the post World War II, or early Cold War, period where approximately 10,000 new nonprofits made their entry into the economy. The third observable period begins with the Vietnam War and continues until the end of the Cold War. Marked by civil unrest and major changes in social conditions within the United States, this period experienced a doubling of the number of new nonprofits per year to 20,000. Most of the century was divided into these three periods of relatively constant growth. However, in the latter part of the decade a new trend appeared. Starting around 1995 the number of new nonprofits per year increased every year. The rate jumped to almost 50,000 per year by 2000. Recall that the previous constant trend was only 20,000 per year. Within approximately ten years from the end of the Cold War the number of new nonprofits per year more than doubled. During the same time period the U.S. economy experienced the longest economic expansion in its history.

Figures 1 through 3 show the number of new nonprofits each year were almost split evenly between organizations qualifying for deductible contributions and those not qualifying for deductible contributions. The share of organizations qualifying for deductions was slightly above 60 percent before 1970 but increased to almost 70 percent after 1970. However, the share of new nonprofits per year qualifying for deductible contributions has been increasing since the late 1970s. Figure 2 shows the growth of those organizations seeking and obtaining deductibility status. However, new nonprofits not qualifying for deductible contributions have remained fairly constant for long periods of time as seen in Figure 3. Deductibility was clearly a desirable objective for organizations being created.

While there are just under 130,000 nonprofits that are not categorized as a 501(c)(3) organization and still qualify for tax deductible contributions, they represent a small fraction (15 percent) of the 1.4 million nonprofits in existence. The vast majority of nonprofits approved to receive tax deductible contributions are categorized in subsection 5 of section 501(c) of the IRS code.

In order to maintain an organization’s tax exempt and deductibility status they must continue to operate under the conditions described at the time of their ruling date. If the structure of the organization changes in ways that the operations could benefit certain individuals, it could lead to a loss in exempt status. Therefore the managerial hierarchy is important as well as forms of compensation if they exist. In addition, for organizations receiving contributions that are tax deductible the source of annual revenues and how those are translated in final products are of major importance. There are not enough individuals with Andrew Carnegie’s wealth to account for the large numbers of new nonprofits, so an examination of the type of organization as it relates to funding is next.

Up to the late 1960s the mixture of organization types varied widely. However, starting around 1970 the variability declines and a pattern emerges. Organizations with substantial government funding or general public support and organizations with minor investment funding and substantial general public support appear to capture the majority share of new nonprofits per year. These two types of organizations share one critical characteristic: they obtain substantial funding support from the general public. The combined shares of these two types of organizations appears...
In addition to how a nonprofit is organized, the activities they actively get involved in help determine whether they belong in the 501(c)(3) category. These activities are what they are doing primarily or exclusively. Any significant change in an organization’s activities can become a reason to revoke their tax benefits.

Activities for new nonprofits have changed over the last half of the century. New organizations involved in religious activities stabilized a little during the mid-1970s and then grew slightly through the 1980s. The list of possible activities is shown below:

1. Religious
2. Schools and Colleges
3. Cultural, Historical, and Other Educational
4. Training and Other Instruction
5. Health Services
6. Scientific Research
7. Business and Professional Organizations
8. Farming
9. Mutual Organizations
10. Employer or Membership Benefit
11. Sports, Athletic Recreational and Social
12. Youth
13. Conservation, Environment and Reutilization Purposes and Activities
14. Housing
15. Inner City or Community
16. Civil Rights
17. Litigation and Legal Aid
18. Legislative and Political
19. Advocacy
20. Other Directories to Individuals
21. Support to Other Organizations
22. Other

In 1989 the share of new nonprofits engaged in religious activities (Activity 1) started declining and continued to decline to less than 10% of the total by 2001. This is lower than the share of new organizations for 1950 involved in religious activities. After 2001 the share of nonprofits engaged in religious activities has been increasing.

Schools (Activity 2) hold a very large share of new nonprofits each year up until the early 1970s when they declined to about half of their previous share. The activities that increased share at the same time were cultural (Activity 3), trust 4%. Each year, it maintained that share of new nonprofits for the remainder of the century. Another new activity that appeared in the 1970s was advocacy (Activity 19) by groups that attempted to influence public opinion concerning fire arms control, the selective service system, national defense policy, weapons systems, government spending, tax, separation of church and state, foreign policy, anti-Communism, right to work, capital punishment, ecology, consumer interests, urban renewal, etc. The advocacy (Activity 19) activity makes up only a small share (1% to 3%) of the purposes of new nonprofits; however, the activity did not exist in measurable amounts prior to that time. Other activities directed to individuals (Activity 20) included supplying money, goods or service to the poor; non-scholarship gifts or grants; loans to individuals; marriage counseling, family planning, credit counseling, job training or counseling, etc. This activity accounted for less than 1% of the new nonprofits per year prior to 1974, when it increased to over 5%. It continued to account for approximately 5% for the remainder of the century.

The community chest and booster club (Activity 21) activity was one of the activities that lost share in the 1970s. It regained share during the 1990s as it increased to approximately 10% of the new nonprofits. This activity had declined to less than 5% in the last couple of years of the century and has been increasing in the last couple of years.

The activity that has grown the most since the 1970s is the “catch all” category for other purposes and activities (Activity 22). It started with its biggest share increase in 1975. Specific activities in this category include cemetery or burial activities, perpetual care funds, emergency or disaster aid fund, community trust, government instrumentality, testing products for product safety, consumer interest groups, veterans activities, patriotic activities, title holding corporation, erection or maintenance of public buildings, cafeteria, restaurants, snack bar, food services, thrift shop, retail outlets, book and gift stores, advertising, loans or credit reporting, endowment fund or financial services, Indian tribes fund-raising, etc. This activity of category allows nonprofit organizations to provide goods and services that compete with the private “for-profit” firms. The activity has grown considerably from about 5 percent of new nonprofits in the early 1970s to a peak of about 45 percent in 1998. It has declined in the most recent years as religious (Activity 1) activities have increased (perhaps impacted by the faith-based initiatives promoted by the federal government).

Overall trends during the 1990s are that religious (Activity 1), cultural (Activity 3), training (Activity 4), youth activities (Activity 12), community chest activities (Activity 21) and other activities directed toward individuals (Activity 20) are declining as a share of new nonprofits per year, while sports/athletic/recreational/social activities (Activity 11), and schools (Activity 2) are increasing slightly. The major increase in shares of new nonprofits is in other purposes and activities (Activity 22), the activity that comes closest to private sector behavior and that activity seems to be related to religious activities (Activity 1) in recent years.

The number of new nonprofits has grown from about 20,000 per year in 1991 to over 50,000 per year in 2001 and the rate has dropped slightly since then. New nonprofits seeking the added benefit of tax deductibility for their contributors has been increasing too and new nonprofits not qualifying for deductible contributions have remained fairly constant. Therefore, deductibility appears to be a desirable objective for organizations being created. In addition, the trend favors the growth of publicly supported organizations that receive their funding from government units and the general public, especially in the years since the bubble burst and the chances of new individuals becoming wealthy have declined. In other words government funds have been playing a greater role in the funding of nonprofits.

These new nonprofits are engaging in activities that come closest to private sector behavior. The incentives to go into commercial-like activities must be very strong since even churches have deviated from their primary focus on religious activities. In conclusion, there are a large number of nonprofits and many more are created each year. These data suggest possible reasons for the increase including tax avoidance or control over tax spending, desire to influence public policy, and a transition toward “privatization” of public goods and services.

—Michael L. Jones is Assistant Professor of Economics.
to dominate and have the effect of stabilizing the vari-
ability overall. The possible types of organizations are
listed below:
(00) Not 501(c)(3)
(02) Private Operating (exempt from excise or income
investment income taxes)
(03) Private Operating (other)
(04) Private Non-Operating
(05) Support
(06) Church
(07) School
(08) Hospital or Medical Research
(09) Government Unit (benefiting college)
(10) Government Unit
(11) Gov't/Non-Substantial Gov or Public Funding
(12) Org w/Substantial Gov or Public Funding
(13) Orgs Supporting 10 to 16
(14) Orgs Supporting 17 to 20
(15) Inner City or Community
(16) Orgs Supporting 21 to 24
(17) Support to Other Organizations
(18) Other
(19) Public Safety Testing
(20) Support to Other Organizations
(21) Other
(22) Support to Other Organizations
In addition to how a nonprofit is organized, the activities they actually get involved in help determine
whether they belong in the 501(c)(3) category. These ac-
tivities, in the years since the bubble burst and the
tax incentives to stimulate contributions, have been
increasing. The incentives to go into commercial-like activities must be very strong since even churches have
deviated from their primary focus on religious activities. In conclusion, there are a large number of nonprofits and many more are created
each year. These data suggest possible reasons for the increase including tax avoidance or control over tax
spending, desire to influence public policy, or a transi-
tion toward “privatization” of public goods and services.

Michael L. Jones is Assistant Professor of Economics.