

# 501(c)3 101

A Guide to Forming, Maintaining, and  
Governing a Non-Profit Corporation

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# Roadmap

- What is a Non-Profit?
  - Meaning, types, categories, comparisons, and advantages
- What do I need to know before starting?
  - Requirements and considerations
- How do I set up my non-profit?
  - Procedures
- How do I “govern” my non-profit?
  - Governance and administrative policies and procedures

# Not-for-profit vs. Tax Exempt

## Not-for-profit

- Not-for-profit is a corporate classification
- A not-for-profit is formed at the state level under corporate laws for a purpose other than making a profit\*\*\*

## Tax-Exempt

- “Tax-Exempt” is a federal taxation classification
- A not-for-profit can seek tax exempt status to avoid paying federal, state, and local taxes on contributions it receives and income it earns
  - Federal Tax: must apply for tax-exempt status with the IRS
  - State & Local: Many accept an IRS determination for their own requirements

# Tax-Exempt Categories

## Organization Reference Chart

Section of 1986 Code	Description of organization	General nature of activities	Application Form <sup>1</sup>	Annual return required to be filed	Contributions allowable
501(c)(1)	Corporations Organized under Act of Congress (including Federal Credit Unions)	Instrumentalities of the United States	No Form	None	Yes, if made for exclusively public purposes
501(c)(2)	Title Holding Corporation For Exempt Organization	Holding title to property of an exempt organization and distributing net income to it	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(3)	Religious, Educational, Charitable, Scientific, Literary, Testing for Public Safety, to Foster National or International Amateur Sports Competition, or Prevention of Cruelty to Children or Animals Organizations	Activities of nature implied by description of class of organization	1023, 1023-EZ	990 <sup>2</sup> or 990-EZ <sup>3</sup> , or 990-PF	Yes, generally
501(c)(4)	Civic Leagues, Social Welfare Organizations; and Local Associations of Employees	Promotion of community welfare; charitable, educational, or recreational	Must provide notice on Form 9976; may also submit Form 1024-A	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No, generally <sup>3, 4</sup>
501(c)(5)	Labor, Agricultural, and Horticultural Organizations	Educational or instructive, the purpose being to improve conditions of work, and to improve products and/or efficiency	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(6)	Business Leagues, Chambers of Commerce, Real Estate Boards, etc.	Improvement of business conditions of one or more lines of business	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(7)	Social and Recreational Clubs	Pleasure, recreation, social activities	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(8)	Fraternal Beneficiary Societies and Associations	Providing for payment of life, sickness, accident or other benefits to members within a lodge system	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes, if for certain Sec. 501(c)(3) purposes
501(c)(9)	Voluntary Employees Beneficiary Associations	Employee association providing for payment of life, sickness, accident, or other benefits to members	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(10)	Domestic Fraternal Societies and Associations	Earnings devoted to charitable, fraternal, and other specified purposes within a domestic lodge system. No benefits to members	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes, if for certain Sec. 501(c)(3) purposes
501(c)(11)	Teachers' Retirement Fund Associations	Teachers' association for payment of retirement benefits	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(12)	Benevolent Life Insurance Associations, Mutual Ditch or Irrigation Companies, Mutual or Cooperative Telephone Companies, and Like Organizations	Activities of a mutual or cooperative nature	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(13)	Cemetery Companies	Burials and incidental activities	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes, generally
501(c)(14)	State-Chartered Credit Unions, Mutual Reserve Funds	Loans to members	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(15)	Mutual Insurance Companies or Associations	Providing insurance to members substantially at cost	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(16)	Cooperative Organizations to Finance Crop Operations	Financing crop operations in conjunction with activities of a marketing or purchasing association	Form 1120-C, Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(17)	Supplemental Unemployment Benefit Trusts	Provides for payment of supplemental unemployment compensation benefits	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(18)	Employee Funded Pension Trust (created before June 25, 1959)	Payment of benefits under a pension plan funded by employees	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>3</sup>
501(c)(19)	Post or Organization of Past or Present Members of the Armed Forces	Activities implied by nature of organization	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No, generally <sup>8</sup>
501(c)(21)	Black Lung Benefit Trusts	Funded by coal mine operators to satisfy their liability for disability or	Letter <sup>7</sup>	990-BL	No <sup>5</sup>

1986 Code	Description of organization	General nature of activities	Form <sup>1</sup>	required to be filed	allowable
501(c)(22)	Withdrawal Liability Payment Fund	To provide funds to meet the liability of employers withdrawing from a multi-employer pension fund	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No <sup>6</sup>
501(c)(23)	Veterans' Organization (created before 1980)	To provide insurance and other benefits to veterans	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No, generally <sup>8</sup>
501(c)(25)	Title Holding Corporations or Trusts with Multiple Parent Corporations	Holding title and paying over income from real property to 35 or fewer parents or beneficiaries	1024	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No
501(c)(26)	State-Sponsored Organization Providing Health Coverage for High-Risk Individuals	Provides health care coverage to high-risk individuals	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No
501(c)(27)	State-Sponsored Workers' Compensation Reinsurance Organization	Reimburses members for losses under workers' compensation acts	Letter <sup>7</sup>	990 <sup>2</sup> or 990-EZ <sup>3</sup>	No
501(c)(28)	National Railroad Retirement Investment Trust	Manages and invests the assets of the Railroad Retirement Account	No Form	990 <sup>12</sup>	No <sup>12</sup>
501(c)(29)	CO-OP health insurance issuers	A qualified health insurance issuer which has received a loan or grant under the CO-OP program	Letter and Form 8718 <sup>15</sup>	990 <sup>2</sup>	No <sup>14</sup>
501(d)	Religious and Apostolic Associations	Regular business activities; Communal religious community	No Form	1065 <sup>10</sup>	No <sup>3</sup>
501(e)	Cooperative Hospital Service Organizations	Performs cooperative services for hospitals	1023	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes
501(f)	Cooperative Service Organizations of Operating Educational Organizations	Performs collective investment services for educational organizations	1023	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes
501(k)	Child Care Organizations	Provides care for children	1023	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes
501(n)	Charitable Risk Pools	Pools certain insurance risks of sec. 501(c)(3) organizations	1023	990 <sup>2</sup> or 990-EZ <sup>3</sup>	Yes
501(q)	Credit Counseling Organization	Credit counseling services	1023	990 <sup>13</sup>	No
521(a)	Farmers' Cooperative Associations	Cooperative marketing and purchasing for agricultural procedures	1028	1120-C	No
527	Political organizations	A party, committee, fund, association, etc., that directly or indirectly accepts contributions or makes expenditures for political campaigns	8871	1120-POL <sup>11</sup> 990 <sup>2</sup> or 990-EZ <sup>3</sup>	No

# 26 U.S. Code Section 501

- (a) Exemption from Taxation: An organization described in subsection (c) or (d)...shall be exempt from taxation under this subtitle...
- (b) Tax on Unrelated Business Income and Certain Other Activities: An organization exempt from taxation under subsection (a) shall be subject to tax to the extent provided in parts II, III, and VI of of this subchapter...

# 26 U.S. Code Section 501

- (c)
  - (3) Corporations, and any community chest, fund, or foundation, **organized and operated exclusively** for religious, charitable, scientific, testing for public safety, literary, or educational purposes, or to foster national or international amateur sports competition (but only if no part of its activities involve the provision of athletic facilities or equipment), or for the prevention of cruelty to children or animals, no part of the net earnings of which **inures** to the benefit of any private shareholder or individual, no substantial part of the activities of which is carrying on propaganda, or otherwise attempting to influence legislation (except as otherwise provided in subsection (h)), and which does not participate in, or intervene in (including the publishing or distributing of statements), any **political campaign** on behalf of (or in opposition to) and candidate for public office.

# 501(c)3

## Legit purposes

- Religious
- Charitable
- Scientific
- Testing for Public Safety
- Literary
- Educational
- Fostering national or international sports competitions
- Prevention of cruelty to kids/animals

## Prohibitions

- Net earnings can't benefit any individual
- No substantial part of operations can carry on propaganda or try to influence legislation
- Can't participate or intervene in any political campaign on behalf of or against any candidate for public office

# Qualifying as Exempt

- Must be:
  - Organized *exclusively* for an exempt purpose (“**Organizational Test**”)
  - Operated *exclusively* for an exempt purpose (“**Operational Test**”)
  - No part of the net earnings...inures to the benefit of any private...individual (“**Private Inurement Test**”)
  - Does not participate in, or intervene in...any political campaign... (“**Political Campaigns Test**”)
- What does “exclusive” mean?
  - Nonexempt activities can’t be substantial
  - In practice, less than 5% is ok

# Organizational Test

- At a minimum, the 501(c)3's organizing documents (the Articles of Incorporation filed with the state/District) must affirmatively:
  - Limit the organization's purpose to one or more "exempt purposes"
    - Charitable, educational, religious, scientific, literary, etc
    - \*\*"Charitable" includes promotion of the arts
  - Prohibit more than an insubstantial amount of nonexempt activities
  - Prohibit all political activities and private inurement; and
  - Provide, upon dissolution, all of the organization's assets will be distributed to charity, or used for a charitable purpose

# Organizational Test p2

- Examples of Purpose Statements
  - For “Charitable Purposes”
    - Sufficient because “charitable” has a generally accepted meaning
  - For “Charitable, philanthropic, and benevolent purposes”
    - Won’t pass because philanthropic & benevolent don’t have a generally accepted meaning, and so it might allow activities broader than those permitted by IRC 501(c)3
  - To “Engage in research”
    - Not all research is scientific, so not really limited to exempt purposes
  - To “Promote American ideals and to further the common welfare and well-being of the community”
    - Too vague and could be accomplished in a non-exempt manner., but maybe if it said “*in a charitable manner*”
  - To “Operate a hospital”
    - May or may not be exempt depending on how it’s operated
    - Also, hospitals have to meet certain specific requirements

# Operational Test

- Walk it like [you] talk it
  - No private inurement
  - Can't benefit private parties more than incidentally
  - No substantial lobbying
  - No political activities
  - Unrelated business activities should be limited

# Private Inurement Test

- Private Inurement
  - 501(c)3s have no “owners”
  - Any payment to an insider above fair market value can cost status
- Excess Benefit
  - For those cases where it's not as extreme as private inurement
  - 25% tax on “disqualified persons” for “excess benefit transactions”
    - 200% tax if not corrected
  - “Disqualified persons include”
    - CEO, CFO, board of directors, others with substantial influence, family members of the above, of businesses that are 35% owned by any of the above
  - Revenue based compensation can be a red flag
- Private Benefit
  - Must operate for the benefit of the general public and avoid activities that will benefit the private interest of any individual or organization more than incidentally
  - Private Inurement is for disqualified parties, Private Benefit is for all

What to know  
before starting  
your 501(c)3

# Types of 501(c)3 Orgs

- Private Foundations—the default
  - Generally operates a principal fund managed by its trustees or directors
  - Often by a small group of people or a family
  - Doesn't seek funding from government or public sources
  - Uses this fund to maintain or aid other charitable organizations
- Public Charities—usually the preferred option
  - Generally gets funding from the general public, receiving grants from individuals, governments, and private foundations

# Characteristics of 501(c)3s

- Limited Liability Protection
- Perpetual Existence
- Eligibility for Grants (from governments, private foundations, and private companies)
- No Owners

# Advantages of 501(c)3s

- Exemption from federal income tax
- State and local property taxes also likely
- Diverse funding opportunities
  - Easier to get grants from governments, private foundations, and private companies
  - Eligible for tax deductible contributions from the public
  - May generate tax-free revenues from exempt activities and some investments
  - Still leaves room for some taxable revenue

# Disadvantages of 501(c)3s

- Requires much greater transparency and facilitation of scrutiny, including immediately public accountability
  - Form 990 information return is publicly available
  - Must be able to deliver exemption application and recent 990s on request from pretty much anyone
- Higher compliance and administrative levels, especially for organizations that fundraise in multiple states
- Can't just work to accomplish "good," need to be vigilant about primarily focusing on exempt or charitable purposes
  - Limits on commercial or pseudo-commercial activities
  - Relationship with insiders must be closely monitored
  - Often a fine line between exempt and non-exempt

# Funding a 501(c)3

- Grants
  - Often heavy lifts and competition
  - Can give you a lift in the beginning or in tough times, but might be hard to rely on
  - Grants may also come with significant restrictions and requirements
- Donations
  - Tax deductible donations are limited to 501(c)3s
  - If they give you \$250 or more then you need to give them an acknowledgement letter, else they can't claim
  - Subtract appropriate values in quid pro quos
- Sales
  - Unrelated Business Income Tax

# Unrelated Business Income Tax

- Tax exempt organizations may generate UBIT when 3 factors are met:
  - The income generated must be from a trade or business;
  - That is regularly conducted; and
  - Is not substantially related to the organization's exempt purpose for which it was granted tax-exempt status
- Issue:
  - If these factors are met, the business will have to pay taxes at corporate levels on such earnings (currently 21%)
  - If there becomes a substantial portion of the organization's operations, it could lose tax-exempt status

# UBIT 2

- Triggers
  - Sell advertising space in a membership magazine
  - Selling items in the gift shop of a museum
- Exclusions (non-exhaustive)
  - Bingo Games
  - Public Entertainment Activity
  - Interest on certain investments
  - Royalties
  - Dividends
- “Substantial” is undefined
  - If you’re planning on working in this space, it’s wise to run things by professionals or counsel
- Filing Requirements
  - Form 990-T; like for regular business, ordinary and necessary business expenses related to this income can offset any UBIT

# UBIT Case Study

## Girl Scout Cookies

- Mission:
  - Build girls of courage, confidence, and character, who make the world a better place
- Those cookies though:



# UBIT Case Study Girl Scout Cookies

- Made by:
  - Little Brownie Bakers, subsidiary of Keebler (owned by Kellogg's); and
  - George Weston Limited
- Problems:
  - Hire other people to make a product
  - Sell this product through child labor
  - License these products to other companies, for cash



# UBIT Case Study

## Girl Scout Cookies

- Mission:
  - Build girls of courage, confidence, and character, who make the world a better place
- Explanation
  - Promotes their mission by teaching girls a wealth of entrepreneurial, financial literacy, and sales [wo]man skills
- Why this is tricky: rewards

# Alternatives to 501(c)3

- Fiscal Sponsorship
- Donor-Advised Fund
- Different 501(c)\_\_\_
- Taxable Non-Profit Corporation

# Fiscal Sponsorship

- What
  - Becoming a “project” of an existing charity
- Why
  - If you’re considering a short-term charitable project, or aren’t ready for the time investment to start your own from scratch
  - Allows you to seek grants and solicit tax-deductible donations under the existing organization’s exempt status
- How
  - Create a contractual relationship with another 501(c)3 public charity, where they “sponsor” your project under their own organization
  - Usually for a fee
- Considerations
  - Donations are treated and reported as donations to the sponsoring charity
  - IRS requires the sponsoring organization to have complete discretion and control over the funds, and the IRS holds the sponsor legally responsible for making sure they’re used for an exempt purpose—not a pass-through
- See Fractured Atlas for arts based sponsorships

# Donor Advised Funds

- What
  - Philanthropic vehicle established in/through a public charity. Allows donors to make a contribution, receive an immediate tax benefit, and recommend grants over time
  - Think of it as a charitable “savings account”
- Why
  - If grant making is your primary objective
- How
  - Make an irrevocable contribution of personal assets (immediate tax ded)
  - Name your DAF account, advisors, and any successors or beneficiaries
  - Contribution is placed in a fund where it can be invested & grow tax free
  - At any time, you can recommend grants from the account to qualified charities
- Considerations
  - IRS is looking for people playing fishy tax games

# Other 501(c)s

- Why
  - If your goals/aims/methods don't fit perfectly within the confines, requirements, and qualifications of a 501(c)3, there may be a better solution
- What
  - Look into options like
    - 501(c)4—"Civic leagues, social welfare organizations"
    - 501(c)6—"Business leagues, chambers of commerce, boards of trade"
    - 501(c)7—"Social and recreational clubs"
- Considerations
  - Many of the limitations for 501(c)s might still be issues, like:
    - Private inurement
    - Private benefit
    - UBIT

# Taxable Non-Profit Corporation

- What
  - Non-profit without the tax exempt
- Why
  - If you're planning a lot of commercial activity without much profit
- Considerations
  - Converting from taxable to tax-exempt is possible, but generates tax-liability on conversion, so you might not want to go this route
  - Private foundation grants can be available to non-501(c)3s if they meet the 501(c)3 requirements

# Benefits Corporation

- Something new
- Recognized in DC, MD, and VA

# Questions to Ask

- Is my organization ready to launch, or should I partner with an existing 501 (c)3 “incubator”?
- Does my plan work in a 501 (c)3 charity?
  - Are my projected programs charitable, educational, etc?
  - Will I be conducting the programs directly, or funding another organization to do so?
  - Who is executing the programs? Will they be paid, and if so, how much?
  - Where will the money come from?
- Am I prepared to handle the administrative, compliance, and governance responsibilities of running a 501 (c)3 organization?

How Do I Set  
Up My 501(c)3?

# How to Start a Non-Profit

- Choose a name—search for it first
- Appoint Directors
- Hold a Board Meeting
- Draft By-Laws
- Create a Conflict of Interest Policy + maybe others
- Form a State/District Entity
- Employer Identification Number (get online/SS-4)
- Apply for an IRS Tax Exemption
  - Form 1023
  - Form 1023-EZ
- Apply for a State exemption if you haven't already, in the state you're registered and the state where your principal office is located
- Get any necessary licenses and permits
- Get your determination letter from the IRS

# By-Laws

- Create a structure for the Board
  - Voting rules
  - How a Non-Profit is governed—meetings, notices, etc
  - Says what policies you'll have in place
  - Creates Committees
  - Creates resolutions for conflict
  - Provides for how the non-profit will dissolve

# Form 1023

- Application for recognition of Tax Exempt Status
- Two Variants
  - 1023
  - 1023-EZ
- Must file within 27 months of date of incorporation for retroactive application; otherwise only retroactive to date of submission

# Form 1023-EZ

- Only available to certain entities, 3 page form allowing applicants to self-certify that they meet requirements and get speedy approval
  - BUT WAIT—IRS might check in, and they'd better like what they see
- Meant only for small entities
  - Can't have more than \$50k in each of the past 3 years, or expected in any of the next 3 years
  - Max assets have to be within \$250k
- Who can't use it?
  - LLCs
  - Successors to For Profit Entities
  - Foreign controlled organizations
  - Had 501(c)3 status revoked
  - Churches, Schools, Universities, Hospitals, Agricultural Research Organizations
  - Affiliated with non-501(c)3 organizations
  - Intend to maintain Donor Advised Funds
- Can often get an answer in 30 days

# Form 1023 “Long”

- 12 pages long, 14 pages of schedules, 38 pages of instructions (8 point font)
- IRS estimates 15.5 hours to complete
- IRS estimates 185 hours of record keeping and learning about the laws behind the 1023
- 150 Questions
  - If any of them are answered incorrectly/incompletely you'll get follow-ups
- Will need
  - Articles of Organization, By-Laws, sample solicitations, contracts, leases, general literature
    - Be wary of trade secrets

# Form 1023 Summarized

- Part I—Identification of Applicant
  - Contact, website, date of formation
- Part II—Organizational Structure
  - Articles of Organization and Board approved By-Laws
- Part III—Required Provisions in Organizing Docs
  - Must cite page & paragraph locations for purpose, dissolution, etc
- Part IV—Narrative Description of your Activities
  - Past/present/future, on an addendum
- Part VI—Beneficiaries
  - Trying to fight fraud and sneakiness
- Part VIII—History
  - Must disclose any status as a successor organization
- Part IX—Financial Data
  - Statements, expenses, and projections for 3 to 4 years
- Part X—Public Charity Status—VITAL

# DC Specific

- In DC, you need a Basic Business License for all operations, but specifically for soliciting funds
- You can't apply for a Basic Business License without exemption determination from the IRS
- Ergo, you can't solicit funds in DC without a determination letter
- What to do? Consider Fiscal Sponsorship, or wait

# Keeping My 501(c)3 in Compliance

# Who's Rules?

- Non-Profits & Tax-Exempt Organizations are governed by 3 groups:
- The State in which they're incorporated
- The IRS
- Charitable Solicitation Registration Laws
  - Apply for DC and 46 states
  - Definition is broad, and includes asking for donations, applying for grants, selling tickets to a fundraiser/raffle, silent auctions, and selling things to raise money (like cookies)
  - Some states require registration for internet donations
  - IRS requires notice of all states where registered if more than \$25k income

# Satisfying State & IRS Requirements

- Operational Test
- By-Laws

# Governance Policies

- Conflicts of Interest Policy
  - State: Usually required by Statute
  - IRS: Not required, but existence must be disclosed
- Whistleblower Policy
  - State: Often required by Statute
  - IRS: Not required, but existence must be disclosed
- Document Retention Policy
  - State: Sometimes required by Statute
  - IRS: Not required
- Compensation Review
  - State: May be required by Statute
  - IRS: Based on reasonableness, must disclose on Form 990 whether a Compensation Committee Exists, and method of determining compensation

# Maintain Status

- Need to maintain Public Charity Tax-Exempt Status
  - Ensure organization's activities continue to be charitable in nature.
- Meet Public Support Test Annually
  - For organizations described in 509(a)1:
    - One-third Test: Receive 1/3 of support from the government, another public charity, or a diverse group of donors; or
    - **Facts and Circumstances Test**: If between 1%-33.33% from the above sources, then has to establish that it normally receives a substantial part of its support from government or general public
  - For organizations described in 509(a)2
    - Receipt of more than one-third of its funds generated by activities in furtherance of its exempt function
    - Limits on investment income and UBIT

# Losing Status

- Most common way to lose public charity status is not meeting the public support test for 2 years
- If you lose it, you'll be re-classified as a private foundation
  - Subject to excise taxes, minimum distributions requirements, more forms, and other regulations

# DC Specific Governance

- Biennial report is **KEY**
- Need at least 3 directors (1 in VA)
- Must have a Chief Management Officer and a Chief Financial Officer (not the same person)
- By-Laws should state term limits, otherwise default is minimum 1 and maximum 5
- Cannot use e-mail voting, polling, or proxy voting unless it's so stated in By-Laws
- Committee types: Board Committee vs. Advisory Committee

# Form 990

- Annual reporting requirement to IRS
- 3 Versions
  - 990 (Traditional)
  - 990 EZ—Short form document that works for organizations with less than \$200k annual revenue, and less than \$500k in assets
  - 990 N—“Postcard” form for organizations with less than \$50k in revenue
- Time Commitment
  - Traditional 990s are 12 pages long, with 17 schedules, and 100 pages of instruction
  - IRS estimates it takes 75 hours to prepare, with an additional 70 hours to learn about the law
  - It's due May 15, but you might be able to get a 6 month extension