From: James, Russell

Sent: Tuesday, November 15, 2022 2:11 PM \*W&I M&P TFP PRA Comments To:

Subject: [EXT] OMB Control No. 1545-0047

The expansion in recent years of estate tax exemption limitations have removed most of the data available to policymakers for understand charitable estate transfers. This comes while an aging population is leading to the greatest inter-generational transfer of wealth in our nation's history. This absence of information can be quickly corrected, along with many additional benefits, by including information on the Form 990 on beguest contributions received.

Organizations already separately report 24 different types of gifts received on Schedule M, along with gifts from fundraising events, federated campaigns, related organizations, and government grants. Including bequest contributions would allow researchers to provide detailed analysis to policymakers and nonprofits organization of the financial effects of charitable estate transfers, including specific organizations and cause types benefitting from these transfers. In a world where estates of a surviving spouse with \$23.4 million or less (in 2023) are not otherwise visible to the Internal Revenue Service due to the high exemption amounts, this would provide a much-needed source of relevant information for policymakers, nonprofits, and researchers.

Best regards, Russell

Russell N. James III, J.D., Ph.D., CFP® Professor & CH Foundation Chair in Personal Financial Planning Director of Graduate Studies in Charitable Planning

Texas Tech University, Lubbock, TX 79409,