

October 16, 2024

Mr. Andres Garcia
Internal Revenue Service
Room 6526
1111 Constitution Avenue, NW
Washington, DC 20224

RE: *Federal Register* notice of September 11, 2024 for the Return of Organization Exempt from Income Tax, Form 990 (OMB Number: 1545-0047)

Dear Mr. Garcia,

The Bureau of Economic Analysis (BEA) strongly supports the continued collection of data by the Internal Revenue Service (IRS) on Form 990. The data collected on this form are crucial to key components of BEA's economic statistics.

Information from this form is used directly in preparing the gross domestic product (GDP) and indirectly in preparing the input-output accounts (I-O) and GDP by industry. Specifically, data from this form are used in: distinguishing household spending and saving from that of nonprofit institutions in the national income and product accounts (NIPAs); reconciling NIPA estimates of nonprofit income and consumption expenditures with Statistics of Income estimates of nonprofit revenue and expenses; and estimating flows of contributions, gifts, and grants between households and nonprofit institutions and among nonprofit institutions.

Information from this form is also used to prepare benchmark I-O gross output estimates of several nonprofit industries, annual estimates of corporate profits of nonprofit institutions serving business, and interest paid by nonprofit institutions serving businesses and households. A detailed list and description of each item used are found in the attachment below.

Please keep BEA informed about any modifications to these forms. We are particularly interested in any modifications proposed during the form's approval process that would substantially affect our use of these data. For additional information, please contact Tiffany Burrell, Source Data Coordinator, on 301-278-9618 or by e-mail at Tiffany.Burrell@bea.gov. Should you need assistance in justifying this form to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,

Dennis J. Fixler
Chief Economist

Attachment

Attachment

Direct Use of IRS Form 990 in Preparation of BEA's National Income and Product Accounts

Items	Uses	NIPA estimate
Interest on savings and temporary cash investments Dividends and interest from securities Other investment income	Used to prepare estimates of property income received by nonprofit institutions to help distinguish household spending and saving from that of nonprofit institutions	Household income; nonprofit income; household saving; nonprofit saving
Grants and allocations Specific assistance to individuals Benefits paid to members	Used to estimate flows of contributions, gifts and grants between households and institutions and between nonprofit institutions, to help distinguish household spending and saving from that of nonprofit institutions, and to help reconcile NIPA estimates of nonprofit income and consumption expenditures with SOI estimates of nonprofit revenue and expenses	Nonprofit current transfer payments to households; transfer payments between nonprofit institutions
Payments to affiliates	Used to estimate flows of contributions, gifts and grants between households and institutions and between nonprofit institutions	Transfer payments between nonprofit institutions
Net gain or (loss)	Used to reconcile NIPA estimates of nonprofit consumption expenditures with IRS estimates of expenses	
Total revenue	Used to reconcile NIPA estimates of nonprofit income measures with IRS estimates of revenue	Revenue of nonprofit institutions
Total expenses	Used to reconcile NIPA estimates of nonprofit consumption expenditures with IRS estimates of expenses	Expenses of nonprofit institutions