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Volume Title: Economic Factors in the Growth of Corporation Giving
Volume Author/Editor: Ralph L. Nelson
Volume Publisher: UMI

Volume ISBN: 0-87014-615-9
Volume URL: http://www.nber.org/books/nels70-1
Publication Date: 1970

Chapter Title: Appendices and index to "Economic Factors in the Growth of Corporation Giving"

Chapter Author: Ralph Lowell Nelson
Chapter URL: http://www.nber.org/chapters/c2861
Chapter pages in book: (p. 91-120)

Appendix A Basic Tables on
Gross National Product and
Corporate Contributions, Income and Tax Rates, 1936-1964

# APPENDIX TABLE I Corporate Contributions as Percentage of Gross National Product 



[^0]
## APPENDIX TABLE II After-Tax Income of Corporations Reporting Net Incomes (Dollar values in millions)

| Year | Net Income After Taxes, After Gifts and Contributions ${ }^{\text {a }}$ |  | Net After-Tax Cost of Gifts and Contributions |  | Net Income After Taxes, Before Gifts and Contributions ${ }^{\text {b }}$ |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Current | 1936 | Current | 1936 | Current | 1936 |
|  | Dollars | Dollars | Dollars | Dollars | Dollars | Dollars |
| 1936 | \$ 8,571 | \$ 8,571 | \$ 23 | \$ 23 | \$ 8,594 | \$ 8,594 |
| 1937 | 8,611 | 8,264 | 25 | 24 | 8,636 | 8,288 |
| 1938 | 5,907 | 5,746 | 19 | 18 | 5,926 | 5,765 |
| 1939 | 7,842 | 7,749 | 23 | 23 | 7,865 | 7,772 |
| 1940 | 8,917 | 8,674 | 22 | 21 | 8,939 | 8,696 |
| 1941 | 11,211 | 10,146 | 18 | 16 | 11,229 | 10,162 |
| 1942 | 12,155 | 9,795 | 31 | 25 | 12,186 | 9,820 |
| 1943 | 13,159 | 9,894 | 44 | 33 | 13,203 | 9,927 |
| 1944 | 12,566 | 9,219 | 68 | 40 | 12,634 | 9,269 |
| 1945 | 11,668 | 8,346 | 89 | 50 | 11,757 | 8,410 |
| 1946 | 18,672 | 11,954 | 131 | 64 | 18,803 | 12,038 |
| 1947 | 22,817 | 13,061 | 148 | 84 | 22,965 | 13,145 |
| 1948 | 24,788 | 13,298 | 146 | 85 | 24,934 | 13,377 |
| 1949 | 21,219 | 11,457 | 136 | 73 | 21,355 | 11,531 |
| 1950 | 27,459 | 14,621 | 100 | 53 | 27,559 | 14,675 |
| 1951 | 24,124 | 12,032 | 113 | 56 | 24,237 | 12,088 |
| 1952 | 22,192 | 10,831 | 143 | 70 | 22,335 | 10,900 |
| 1953 | 22,904 | 11,075 | 177 | 86 | 23,084 | 11,162 |
| 1954 | 23,822 | 11,355 | 148 | 71 | 23,970 | 11,425 |
| 1955 | 30,010 | 14,096 | 197 | 93 | 30,207 | 14,188 |
| 1956 | 30,308 | 13,770 | 198 | 90 | 30,506 | 13,860 |
| 1957 | 29,667 | 12,995 | 198 | 87 | 29,865 | 13,081 |
| 1958 | 26,404 | 11,274 | 184 | 79 | 26,588 | 11,353 |
| 1959 | 31,114 | 13,079 | 227 | 95 | 31,341 | 13,174 |
| 1960 | 30,685 | 12,685 | 228 | 94 | 30,913 | 12,779 |
| 1961 | 32,781 | 13,380 | 242 | 99 | 33,023 | 13,479 |
| 1962 | 35,883 | 14,498 | 283 | 114 | 36,166 | 14,613 |
| 1963 | 39,208 | 15,633 | 312 | 124 | 39,520 | 15,758 |
| 1964 | 45,800 | 17,961 | 362 | 142 | 46,162 | 18,103 |

[^1]
# APPENDIX TABLE III Gifts and Contributions as Percentage of After-Tax Income, Corporations Reporting Net Income (Dollar values in millions) 



[^2]
## APPENDIX TABLE IV Gifts and Contributions, Deficit, and Number of Corporations Reporting No Net Income (Dollar values in millions)

|  | Gifts and <br> Contributions |  | Reported Deficit |  |  |
| :--- | :---: | :---: | :---: | :---: | :---: | :---: |

[^3]
## APPENDIX TABLE V Estimated Net After-Tax Cost or "Price" of \$1 in Contributions, Corporations with Net Income (Dollar values in millions)

|  | Net Income of Corporations That Were: |  | Complement of Maximum Marginal Tax Rate |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| Year | Subject to Excess-Profits-Tax Liability | Not Subject to Excess-Profits-Tax Liability | Combined, Normal, Surtax and ExcessProfits Tax | Normal and Surtax Only | After-Tax Cost or "Price" of $\$ 1$ in Contributions |
| 1936 | - | - | - | 0.85 | \$ . 850 |
| 1937 | - | - | - | 0.85 | . 850 |
| 1938 | - | - | - | 0.81 | . 810 |
| 1939 | - | - | - | 0.81 | . 810 |
| 1940 | \$ 3,920 | \$ 7,283 | 0.26 | 0.76 | . 585 |
| 1941 | 11,109 | 7,002 | 0.09 | 0.69 | . 322 |
| 1942 | 17,475 | 6,577 | 0.20 | 0.60 | . 323 |
| 1943 | 22,751 | 5,967 | 0.20 | 0.60 | . 283 |
| 1944 | 21,044 | 6,080 | 0.20 | 0.60 | . 290 |
| 1945 | 14,645 | 7,520 | 0.20 | 0.60 | . 336 |
| 1946 | - | - | - | 0.62 | . 620 |
| 1947 | - | - | - | 0.62 | . 620 |
| 1948 | - | - | - | 0.62 | . 620 |
| 1949 | - | - | - | 0.62 | . 620 |
| 1950 | 26,858 | 17,283 | 0.28 | 0.58 | . 398 |
| 1951 | 24,946 | 20,387 | 0.1925 | 0.4925 | . 327 |
| 1952 | 16,813 | 23,619 | 0.18 | 0.48 | . 355 |
| 1953 | 16,793 | 25,026 | 0.18 | 0.48 | . 360 |
| 1954 | - | - | - | 0.48 | . 480 |
| 1955 | - | - | - | 0.48 | . 480 |
| 1956 | - | - | - | 0.48 | . 480 |
| 1957 | - | - | - | 0.48 | . 480 |
| 1958 | - | - | - | 0.48 | . 480 |
| 1959 | - | - | - | 0.48 | . 480 |
| 1960 | - | - | - | 0.48 | . 480 |
| 1961 | - | - | - | 0.48 | . 480 |
| 1962 | - | - | - | 0.48 | . 480 |
| 1963 | - | - | - | 0.48 | . 480 |
| 1964 | - | - | - | 0.50 | . 500 |

## APPENDIX TABLE VI Estimated Net After-Tax Cost of Reported Gifts and Contributions, and Net Cost as Percentage of After-Tax Income, Net-Income Corporations (Dollar values in millions)

|  | Gifts and Contributions (Current dollars) | "Price" of $\$ 1$ in Contributions | Net After-Tax Cost of Reported Contributions |  | Net Income, After Taxes, Before Gifts and Contributions (Current dollars) | Net After <br> Tax Cost as Percentage of Net After-Tax Income |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Year |  |  | Current Dollars | 1936 <br> Dollars |  |  |
| 1936 | \$ 27 | \$0.850 | \$ 23 | \$ 23 | \$ 8,594 | 0.27 |
| 1937 | 29 | 0.850 | 25 | 24 | 8,636 | 0.29 |
| 1938 | 23 | 0.810 | 19 | 18 | 5,926 | 0.31 |
| 1939 | 29 | 0.810 | 23 | 23 | 7,865 | 0.30 |
| 1940 | 37 | 0.585 | 22 | 21 | 8,939 | 0.24 |
| 1941 | 57 | 0.322 | 18 | 16 | 11,229 | 0.16 |
| 1942 | 96 | 0.323 | 31 | 25 | 12,186 | 0.25 |
| 1943 | 158 | 0.283 | 44 | 33 | 13,203 | 0.33 |
| 1944 | 233 | 0.290 | 68 | 40 | 12,634 | 0.43 |
| 1945 | 263 | 0.336 | 89 | 50 | 11,757 | 0.59 |
| 1946 | 211 | 0.620 | 131 | 64 | 18,803 | 0.53 |
| 1947 | 238 | 0.620 | 148 | 84 | 22,965 | 0.64 |
| 1948 | 236 | 0.620 | 146 | 85 | 24,934 | 0.64 |
| 1949 | 220 | 0.620 | 136 | 73 | 21,355 | 0.63 |
| 1950 | 250 | 0.398 | 100 | 53 | 27,551 | 0.36 |
| 1951 | 341 | 0.327 | 113 | 56 | 24,237 | 0.46 |
| 1952 | 396 | 0.355 | 143 | 70 | 22,335 | 0.64 |
| 1953 | 491 | 0.360 | 177 | 86 | 23,081 | 0.77 |
| 1954 | 309 | 0.480 | 148 | 71 | 23,970 | 0.62 |
| 1955 | 410 | 0.480 | 197 | 93 | 30,207 | 0.66 |
| 1956 | 413 | 0.480 | 198 | 90 | 30,506 | 0.65 |
| 1957 | 412 | 0.480 | 198 | 87 | 29,865 | 0.67 |
| 1958 | 383 | 0.480 | 184 | 79 | 26,588 | 0.70 |
| 1959 | 472 | 0.480 | 227 | 95 | 31,341 | 0.72 |
| 1960 | 475 | 0.480 | 228 | 94 | 30,913 | 0.74 |
| 1961 | 505 | 0.480 | 242 | 99 | 33,023 | 0.73 |
| 1962 | 590 | 0.480 | 283 | 114 | 36,166 | 0.78 |
| 1963 | 651 | 0.480 | 312 | 124 | 39,520 | 0.79 |
| 1964 | 723 | 0.500 | 362 | 142 | 46,162 | 0.78 |

## Appendix B Illustrative

Computation of Net After-Tax
Cost of Corporate Contributions

## APPENDIX TABLE VII Illustrative Computation of Average Net After-Cost or "Price" of $\$ 1$ in Corporate Contributions, 1953

Net Income Class

Net Cost
of $\$ 1$ in
Contributions
Total Net
Income
(Deficit)
(Millions)

Total
Gifts and
Contributions
(Thousands)

| Zero or negative net income | \$1.00 | (\$2,335) | \$ 3,880 |
| :---: | :---: | :---: | :---: |
| Positive net income |  |  |  |
| \$0 to \$25,000 | 0.70 | 2,296 |  |
| \$25,000 and over 2,206 |  |  |  |
| No excess-profits tax | 0.48 | 22,731 | 490,637 |
| Excess-profits tax | 0.18 | 16,793 |  |

## Method of computing average net cost of contributions for corporations with net income

| Weight (income) | "Price" | Product |
| :---: | :---: | :---: |
| $\$ 25,027$ | $\times 0.48$ | $=\$ 12,012$ |
| $\frac{16,793}{\$ 41,820}$ | $\times 0.18$ | $=\frac{3,023}{\$ 15,035}$ |
| Average "Price" | $=\frac{\$ 15,035}{\$ 41,820}=$ | .360 |

## ASSUMPTIONS:

1. Corporations with net income of less than $\$ 25,000$ gave the same percentage of income as those with incomes greater than $\$ 25,000$ but not in the excess-profits category. This, even though "price" of giving is much higher for the former group. The justification is that corporations with less than $\$ 25,000$ in net income accounted for a sufficiently small percentage of contributions and income that differences in giving rates would have negligible effect on the average. In the period 1950 to 1963, these under$\$ 25,000$ corporations accounted for between 4.9 and 7.3 per cent of the total net income of corporations with net income.
2. Corporations liable for the excess-profits tax gave the same percentage of income as those liable only for the ordinary corporate income tax. This, even though the "price" of giving was much lower for the excess-profits-tax group. This assumption surely leads to an overstatement in the average "price" in those years when the excess-profits tax applied to corporations accounting for a large percentage of corporate net income. In 1953, for example, this assumes that, of the $\$ 491$ million in contributions made by corporations with a net income, $\$ 197$ million or only 40 per cent was made by corporations liable for excess-profits taxes, as this was their share of corporate net income.

# APPENDIX TABLE VIII Estimate of Hypothetical 1963 Contributions by Corporations on the Assumption of the Same Net After-Tax Percentage of Income That Was Given in 1936-1939 (Dollar values in millions) 

$\left.\begin{array}{lcccc} & & & \begin{array}{c}\text { Hypothetical, } \\ \text { 1963, }\end{array} \\ \text { Assuming } \\ \text { Same Net } \\ \text { After-Tax }\end{array}\right)$

Appendix C Regression
Coefficients Relating Corporation
Giving to Successively Larger
Numbers of Explanatory
Variables, Based on Time-
Series Data (Data, logarithmically transformed, are for the period
1936-1963; T-ratios given in parentheses)

## APPENDIX TABLE IX Scale Elasticity Coefficients

| Trend |
| :---: |
| $T$ |
|  |
|  |
|  |
| 0.022 |
| $(3.07)$ |
| 0.021 |
| $(4.06)$ |
| 0.016 |
| $(4.57)$ |
| 0.012 |
| $(4.47)$ |
| 0.012 |
| $(3.32)$ |

Tax-Change
気
0.60

| 9 |
| :--- |
| 0 |

ع8.0
${ }_{0}^{\circ}$
$\dot{O}$
0
$\stackrel{\$}{0}$

튺

 $\stackrel{\text { N }}{5}$

$\frac{\text { Price Variables }}{\log _{t 0} P \quad \log _{10} P_{t-1}}$

$\frac{\text { Scale Variables }}{\log _{10} \mathrm{Y}_{t-1}}$
$\overline{\log _{t 0} Y \quad \log _{t 0} Y_{t-1}}$


## APPENDIX TABLE X Profitability Elasticity Coefficients



$\frac{\text { Price Variables }}{\log _{10} P \quad \log _{10} P_{t-1}}$ $\binom{-0.81}{6.28} \quad-0.90$


$\frac{\text { Net Worth }}{\log _{10} N W}$

 2
2
5
0
0
3
3
3
3
3
3
烒 Term $-7.52$ $-2.33$ $-0.13$ 99.0-
$-1.19$ $-2.44$
Von Neumann 준 중



| Scale Variables |  | Tax-Change Expectations | $\frac{\text { Trend }}{T}$ |
| :---: | :---: | :---: | :---: |
| $\log _{10} \mathrm{Y}$ | ${ }_{\text {Log }}^{\text {to }}$ ( $\mathrm{Y}_{t-r}$ |  |  |
|  |  |  | 0.030 |
|  |  |  | (8.84) |
|  |  |  | (9.99) |
|  |  |  | 0.027 |
|  |  |  | (9.88) |
|  |  | 0.06 | 0.027 |
|  |  | (1.31) | (9.97) |
| 1.05 |  | 0.06 | 0.016 |
| (4.08) |  | (1.96) | (4.83) |
| 1.13 |  | 0.08 | 0.015 |
| (4.31) |  | (2.33) | (4.47) |
| 0.97 | 0.46 | 0.08 | 0.012 |
| (3.65) | (1.72) | (2.44) | (3.32) |
|  |  | Net Worth |  |
|  |  | Log $_{10}$ NW |  |
| 0.81 |  | -1.20 | 0.029 |
| (3.17) |  | ( 2.81) | (5.24) |
| 0.67 |  | -1.52 | 0.034 |
| (2.55) |  | ( 3.29) | (5.50) |


| Constant <br> Term | Price Variables |  |
| :---: | :---: | :---: |
|  | Log $_{10} \mathrm{P}$ | $\operatorname{Log~}_{r 0} \mathrm{P}_{t-1}$ |
| 4.05 | $\binom{-1.17}{(2.98}$ |  |
| 4.50 |  | $\begin{gathered} -1.43 \\ (4.46) \end{gathered}$ |
| 4.48 | 0.03 | -1.46 |
|  | ( 0.06) | ( 2.79) |
| 3.12 | $\begin{gathered} -0.89 \\ \left(\begin{array}{c} 4.49 \end{array}\right) \end{gathered}$ |  |
| 3.41 |  | $\begin{gathered} -1.03 \\ (6.85) \end{gathered}$ |
| 3.47 | -0.15 | -0.91 |
| 3.31 | $\left(\begin{array}{c}0.62) \\ 0.06\end{array}\right.$ | ${ }_{( }^{(3.81)}$ |
|  | 0.20) | ( 4.05 ) |
| -0.75 |  | -1.03 $\left(\begin{array}{c}9.08)\end{array}\right.$ |
| -1.19 | 0.28 | ${ }_{( }^{(9.08)}$ |
|  | (1.24) | ( 6.18) |
| -2.44 | $\begin{gathered} 0.34 \\ (1.58) \end{gathered}$ | $\begin{array}{r} -1.26 \\ (6.59) \end{array}$ |
| 6.01 |  | -0.90 |
|  |  | ( 7.86) |
| 8.17 | $\left.\begin{array}{c} -0.29 \\ (1.55 \end{array}\right)$ | $\begin{gathered} -0.65 \\ \left(\begin{array}{c} 3.29 \end{array}\right) \end{gathered}$ |

APPENDIX TABLE XII Other Time－Related Factors（Trend Coefficients）a
Von Neumann
응 N N N




$$
\frac{\text { Price Variables }}{\log _{10} P \quad \log _{10} P_{t-1}}
$$


0.81
$(3.17)$
0.67
$(2.55)$
0.66
$(2.46)$
$\log _{10} N W$

（0．14）（ 2.68 ）
$\frac{\text { Scale Variables }}{\log _{10} Y \quad \log _{10} Y_{t-1}}$
$\begin{array}{cc}1.05 & 0.06 \\ (4.08) & (1.96) \\ 1.13 & \\ (4.31) & \\ 0.97 & 0.46 \\ (3.65) & (1.72)\end{array}$

| あ |
| :--- |
| $\mathbf{~}$ |

$\stackrel{8}{8}$
4
0
0
Adjusted
R－Squared
0.88
$\stackrel{刃}{0}$
0.93


Tax－Change
Expectations
©
Net Worth

が守

| Trend |
| :---: |
| $T$ |
| 0.027 |
| $(9.99)$ |
| 0.016 |
| $(4.57)$ |
| 0.016 |
| $(4.83)$ |
| 0.012 |
| $(4.47)$ |
| 0.012 |
| $(3.32)$ |

$$
\begin{array}{r}
0.029 \\
(5.24) \\
0.034 \\
(5.54) \\
0.033 \\
(4.03)
\end{array}
$$



a Includes only equations with
if ratio falls outside this range．

| Constant |
| :---: |
| Term |

3.41
-0.66
-0.75
-1.19
-2.44

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APPENDIX TABLE XIII Matrix of Simple Correlation Coefficients for Regressions Based on Time-Series Data, Presented in Appendix Tables IX through XII

| Gifts and Contributions $\left(\log _{10}\right)$ $\mathrm{X}_{1}$ | $\begin{aligned} & \text { After-Tax Income } \\ & \text { (Scale) } \end{aligned}$ |  | "Price" |  | $\begin{gathered} \text { Net Worth } \\ \text { Current Year } \\ \left(\log _{10}\right) \\ X_{6} \end{gathered}$ | Tax-Change Expectations X, |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  | Current | Preceding | Current | Preceding |  |  |
|  | Year | Year | Year | Year |  |  |
|  | $\left(\log _{10}\right)$ | $\left(\log _{10}\right)$ | $\left(\log _{10}\right)$ | $\left(\log _{10}\right)$ |  |  |
|  | $\mathrm{X}_{2}$ | $\mathrm{X}_{\mathbf{s}}$ | $\mathrm{X}_{4}$ | $\mathrm{X}_{5}$ |  |  |
| 1.000 |  |  |  |  |  |  |
| +. 781 | 1.000 |  |  |  |  |  |
| +. 770 | +. 772 | 1.000 |  |  |  |  |
| -. 513 | $-.194$ | -. 268 | 1.000 |  |  |  |
| -. 666 | -. 210 | -. 263 | +. 778 | 1.000 |  |  |
| +. 530 | $+.600$ | +. 548 | -. 097 | -. 046 | 1.000 |  |
| +. 112 | -. 008 | +. 068 | -. 373 | -. 034 | $+.080$ | 1.000 |
| +.826 | $+.804$ | +. 794 | -. 165 | -. 272 | $+.860$ | 0.000 |

After-Tax Income



$\stackrel{\circ}{\circ}$

| APPENDIX TABLE XIV |  | Appendix D |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  | Matrix of Simple Correlation Coefficients for Regression Equations Based on Cross－Sectional Data，Presented in Text Table 14 |  |  |  |  |
| Contri－ butions | Number of Corporations | Pre－Tax <br> Profits | Net Worth | Employ－ ment | Officers＇ Compensation | Dividends |
| $\begin{gathered} \log _{10} \\ \mathrm{X}_{1} \end{gathered}$ | $\begin{gathered} \log _{10} \\ \mathbf{X}_{2} \end{gathered}$ | $\begin{gathered} \log _{10} \\ X_{3} \end{gathered}$ | $\begin{gathered} \log _{10} \\ X_{4} \end{gathered}$ | $\begin{gathered} \log _{10} \\ \mathbf{X}_{s} \end{gathered}$ | $\log _{10}$ | $\begin{gathered} \log _{1 a} \\ \mathbf{X}_{r} \end{gathered}$ |
| 1.000 |  |  |  |  |  |  |
| $+.516$ | 1.000 |  |  |  |  |  |
| $+.776$ | ＋． 428 | 1.000 |  |  |  |  |
| $+.740$ | ＋． 420 | ＋． 903 | 1.000 |  |  |  |
| $+.680$ | ＋． 637 | ＋． 657 | ＋． 664 | 1.000 |  |  |
| ＋． 477 | ＋． 843 | ＋． 615 | ＋． 672 | ＋． 644 | 1.000 |  |
| ＋．854 | ＋． 286 | $+.871$ | $+.885$ | $+.597$ | ＋． 455 | 1.000 |
| ＋．818 | ＋． 411 | ＋． 921 | $+.950$ | ＋． 669 | ＋． 620 | ＋． 955 |

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# Appendix E Comparison of Nelson and Schwartz Analyses of the Determinants of the Growth in Corporate Giving 

A statistical examination of the income and price elasticities of giving has been made by Mr. Robert A. Schwartz as part of a doctoral dissertation at Columbia University.* Mr. Schwartz uses the same general approach, draws data from the same sources, and covers roughly the same time period as the present study. His analysis differs in significant respects from the present one, however, with important differences in findings. The two studies will here be compared to examine the effects of the two approaches and to determine which one might be regarded as providing more valid interpretation of the historical record.

## The Giving and Income Variables

As shown in Appendix Table XV, the measure of giving or income adopted by Schwartz is the average per corporation, profit and loss corporations combined. The measure adopted by Nelson is the aggregate giving or income of all profit corporations taken as a group. An examination of time patterns in the several series led Nelson to the conclusion that the correlation measures would be more directly indicative of the effects being measured, and contain less statistical "static," if the aggregate measures were used.

For one thing, the measure based on averages provides an ambiguous description of how the size of the typical corporate giver has changed over time. One source of this ambiguity is the year-to-year

[^4]
# APPENDIX TABLE XV Comparison of Nelson and Schwartz Analyses of the Determinants of the Growth in Corporate Giving 

|  | Nelson |
| :---: | :---: |
| Time period covered | 1936-1963 |
| Treatment of income variable | Aggregate after-tax income of corporations with net income, deflated for price level changes |
| Treatment of "price" variable | Complement of marginal tax rate, corporations with net income; in excess-profits tax years, weighted average of complements of normal and excess-profits tax marginal rates |
| Treatment of giving variable | Aggregate gifts and contributions of corporations with net income, deflated for price level changes |

Schwartz

1936-1961
Average after-tax income per corporation, profit and loss corporations combined, deflated for price level changes

Complement of average tax rate, for net income corporations, averaged with price of $100 \%$ for loss corporations

Average gifts and contributions per corporation, profit and loss corporations combined, deflated for price level changes
changes in the total number of corporations. Such changes mainly reflect the creation and dissolution of large numbers of small corporations, and reflect "demographic behavior" unrelated to movements in giving. These incidental population changes, for present purposes the equivalent of statistical errors, serve more to obscure the underlying income-giving relationship than to illuminate it.

Based on data expressed on an average per corporation, the Schwartz study found a negative secular trend in both the income and giving series. The decline probably reflects, in the main, the proliferation of small corporations over the period, and not a shift in the size distribution among the larger corporations that account for the preponderance of contributions.

The present study uses data for corporations with net incomes only. The Schwartz study used data for all corporations, including those reporting losses. Examination of the detailed data indicated that the inclusion of loss corporations would introduce spurious short-term and secular movements into the data, and would be especially troublesome in interpreting analyses based on averages. While accounting
for less than 2 per cent of total contributions, the relative effect of loss corporations on other magnitudes was much greater. From 1940 through 1963, they ranged from 27 to 53 per cent of the number of corporations in a given year, and offset the income of profitable corporations by total loss that ranged from 4 to 21 per cent of total positive income. (See Chart C in Chapter 2.) The trend in loss offset contributed to the decline in average income observed in the Schwartz data, rising from an average of 6.1 per cent in 1940-1945 to 16.0 per cent in 1960-1963.

## The "Price" Variable

The net after-tax cost of a given amount of contributions is determined by the marginal tax rate to which the corporation is subject. As explained in Chapter 3, contributions are thus made at one of several "prices," depending on the tax status of the corporation. Ideally, the price index would be computed as weighted average of the several prices, each weighted by the amount of contributions made at each price. Unfortunately the data are not classified in a manner which would permit this.

The Nelson price variable retains the marginal tax-rate basis for evaluation, while using a weighting system based on the income of corporations subject to the several tax rates. As explained in Appendix Table VII, this treatment understates, probably to a minor degree, movements in the effective "price" of giving. The Schwartz price variable is based on the average tax rate and, as such, substantially understates the movement in the effective "price" of giving, particularly during periods when the excess-profits tax was faced by changing numbers of corporations.

The differing treatments by Nelson and Schwartz produce significantly different measures of income and price elasticity. A regression, using logarithmically (base 10) transformed variables was run which, except for a slight difference in the time period covered and the addition of a trend variable, reproduced the relevant one presented by Schwartz. A comparison of the two sets of elasticities is presented in tabular form below :

|  | Income |  | Price |  |
| :---: | :---: | :---: | :---: | :---: |
|  | Nelson | Schwartz | Nelson | Schwartz |
| Measure of elasticity | +0.80 | +0.63 | -0.89 | -2.00 |
| Variance in explanatory variable | . 0104 | . 0169 | . 0199 | . . 0079 |

The lower measure of income elasticity produced by Schwartz reflects the greater variance in his income variable. As mentioned above, this in turn reflects the spuriously high variability introduced into the income variable by expressing income on a per-corporation basis. Changes in the business population, largely unrelated to giving behavior, thus become a factor serving to reduce the measure of income elasticity.

The high price elasticity found by Schwartz ( -2.00 ) reflects the low variance in his price variable, because, as would be expected, the average tax rate showed much lower variability than the marginal tax rate. The higher variance in the Nelson price variable, on the other hand, produced a lower measure of price elasticity. The influence of tax rates on giving, while appreciable, probably did not demonstrate the degree of short-run responsiveness implied by the very high elasticity coefficients presented in the Schwartz analysis.

Finally, the Schwartz analysis found no relationship between giving and time-related factors other than income and price. This result could have been predicted, given the fact that both per-corporation income and giving showed flat to slightly declining time patterns over the period. But, as shown above, much of the flatness in trend can be attributed to the effect on the averages of loss corporations, a group accounting for only a minute share of giving. Were only profit corporations included in the analysis-and with some adjustment for effects of population changes among small corporations-the Schwartz analysis might well have found (as did the Nelson analysis) that time-related factors other than income and price made a significant separate contribution to the growth in giving.

## Appendix F

APPENDIX TABLE XVI The Contributions Dollar

| 1947 |  |
| ---: | ---: |
| Thousands <br> of Dollars | $\%$ <br> Total |
| 6,118 | 38.0 |
| - | - |
| - | - |
| 2,093 | 13.0 |
| - | - |
| 10,626 | 66.0 |


| 1955 ${ }^{\text {a }}$ |  |
| :---: | :---: |
| 180 Companies |  |
| Thousands of Dollars | $\%$ of Total |
| 8,378 | 21.9 |
| 497 | 1.3 |
| 3,290 | 8.6 |
| - |  |
| 19,397 | 50.7 |
| 1,071 | 2.8 |
| 994 | 2.6 |
| 1,262 | 3.3 |
| 2,257 | 5.9 |
| 2,027 | 5.3 |


| APPENDIX TABLE XVI The Contributions Dollar |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: |
| 1965 |  | 1962 |  | 1959 |  |
| 540 Companies |  | 465 Companies |  | 280 Companies |  |
| Thousands of Dollars | \% of Total | Thousands of Dollars | \% of Total | Thousands of Dollars | $\%$ of Total |
| 50,558 | 24.2 | 39,280 | 25.5 | 25,450 | 25.1 |
| 3,176 | 1.5 | 2,183 | 1.4 | 1,520 | 1.5 |
| 4,043 | 1.9 | 4,114 | 2.7 | 3,340 | 3.3 |
| 17,172 | 8.2 | 9,369 | 6.1 | 9,330 | 9.2 |
| 2,018 | 1.0 | 1,016 | 0.7 | 1,410 | 1.4 |
| 5,301 | 2.5 | 5,140 | 3.3 | 2,830 | 2.8 |
| 4,653 | 2.2 | 2,002 | 1.2 | 1,820 | 1.8 |
| 86,921 | 41.5 | 63,104 | 40.9 | 45,700 | 45.1 |
| 10,569 | 5.0 | 7,832 | 5.1 | 4,860 | 4.8 |
| 4,715 | 2.3 | 4,271 | 2.8 | 4,050 | 4.0 |
| 5,073 | 2.4 | 4,040 | 2.6 | 3,440 | 3.4 |
| 15,180 | 7.3 | 9,695 | 6.3 | 9,930 | 9.8 |
| 20,487 | 9.8 | 18,813 | 12.2 | 8,010 | 7.9 |
| 7,068 | 3.4 | 4,791 | 3.1 | 2,830 | 2.8 |

Health and welfare
Federated drives: United
Funds and the like National health agencies (not included above) National welfare agencies
(not included above) (not included above)
Hospitals
Capital grants Opital grants
Operating grants
Other local health and Capital grants (excluding total

$$
\begin{aligned}
& \text { Education } \\
& \text { Higher education }
\end{aligned}
$$

Higher education
Research grants (not treated
as a business expense)
Capital funds
Direct unrestricted grants
Grants to state, area and
national fund-raising groups

| Education-related agencies | 3,741 | 1.8 | 1,793 | 1.2 | 1,310 | 1.3 | - | - | - | - |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Other | 8,513 | 4.1 | 9,740 | 6.3 | 3,340 | 3.3 | 3,596 | 9.4 | - | - |
| Secondary education |  |  |  |  |  |  |  |  |  |  |
| Capital grants | 765 | 0.4 | 537 | 0.3 | 100 | 0.1 | 191 | 0.5 | - | - |
| Other | 4,233 | 2.0 | 3,019 | 2.0 | 1,720 | 1.7 |  | - | - | - |
| total | 80,344 | 38.4 | 64,531 | 41.9 | 39,590 | 39.1 | 11,975 | 31.3 | 2,254 | 14.0 |
| Culture (cultural centers, performing arts, museums, etc. ) ${ }^{\text {b }}$ |  |  |  |  |  |  |  |  |  |  |
| Operating funds | 3,332 | 1.6 |  |  |  |  | - | - | - | - |
| Capital grants | 2,501 | 1.2 |  |  |  |  | - | - | - |  |
| total | 5,833 | 2.8 |  |  |  |  | 1,224 | 3.2 | - | - |
| Civic causes (municipal and community improvement, good government and the like) |  |  |  |  |  |  |  |  |  |  |
| total | 12,099 | 5.8 | 8,239 | 5.3 | 2,940 | 2.9 | - | - | - | - |
| Other |  |  |  |  |  |  |  |  |  |  |
| Religious causes | 1,053 | 0.5 | 589 | 0.4 | 400 | 0.4 | 191 | 0.5 | - | - |
| Groups devoted solely to economic education | 1,788 | 0.9 | 1,756 | 1.1 | 1,520 | 1.5 | 803 | 2.1 | - | - |
| Groups in U.S. whose principal objective is aid to other countries | 7,868 | 3.8 | 2,726 | 1.8 | 500 | 0.5 | 114 | 0.3 | - |  |
| Causes other than above | 8,474 | 4.0 | 10,856 | 7.1 | 7,200 | 7.1 | 1,759 | 4.6 | - | - |
| total | 19,183 | 9.2 | 15,927 | 10.3 | 9,630 | 9.5 | 2,869 | 7.5 | 3,220 | 20.0 |
| Dollars not identifiable because donee is unknown | 4,916 | 2.3 | 2,341 | 1.5 | 3,540 | 3.5 | 2,792 | 7.3 | - | - |
| Grand total | 209,296 | 100.0 | 154,142 | 100.0 | 101,400 | 100.0 | 38,260 | 100.0 | 16,100 | 100.0 |

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[^0]:    sources: Gross National Product and Implicit Price Defator: U.S. Department of Commerce, Survey of Current Business, August, 1965, pp. 24-25; 52-53. Corporate Gifts and Contributions: U.S. Treasury Department, Statistics of Corporate Income Tax Returns, various years.

[^1]:    source: Corporation Net Income: U.S. Treasury Department, Statistics of Income, Corporate Income Tax Returns, various years.
    a Net taxable income, plus income from tax-exempt securities, minus income and ex-cess-profits taxes, plus foreign tax credit. Includes investment credit in years 1962-1964.
    ${ }^{b}$ Net income after taxes, after gifts and contributions, plus net after-tax cost of gifts and contributions.

[^2]:    a Net taxable income plus income from tax-exempt securities.

[^3]:    source: U.S. Treasury Department, Statistics of Income, Corporation Income Tax Returns, various years.

[^4]:    * "Private Philanthropic Contributions-An Economic Analysis," 1966. Schwartz's chapter on corporation giving has been revised and published as "Corporate Philanthropic Contributions," Journal of Finance, June, 1968, pp. 479-497. The statistical results are unchanged from those presented in the dissertation and examined here.

