

The top line of table 3 shows a computation for estate tax returns filed in 1961 where the gross estate was over \$200,000. This accounts for about 0.9 percent of all decedents and is thus roughly comparable to the data for the 1920's and 1930's. On this basis the charitable bequests, as a percentage of estates, show an appreciable growth. Robert Lampman's data² show that the share of total wealth of the top 1 percent of estate holders declined slightly from the 1920's through 1956.³ This share is, however, quite sensitive to common stock prices. The fact that common stock prices have risen more than other prices since 1956 would roughly serve to restore the relative share of wealth held by the top 1 percent. On balance it is likely that a larger portion of the property changing hands at death goes into charitable hands via bequests now than was the case in the 1920's. In 1929 the portion might have been 1.5 percent. Presently, it might be 3 percent. The growth is sharper when comparison is made with the early 1920's.

2. Contributions by type of recipient

The data on the types of recipients of charitable contributions are extremely scarce. Table 3 shows a breakdown by broad categories for estate tax deductions for various years. Presumably, the category "other" charitable bequests is made up to a significant extent by bequests to foundations. Kahn, on the basis of very skimpy data, guessed that the bequests to foundations in 1952 may have been in the vicinity of \$40 million.⁴ A special tabulation of estate tax returns filed in 1957 and 1959 suggests that the annual bequests to "private" organizations might have been about \$150 million. The size of "other" bequests has risen from about 60 percent of charitable bequests in 1939 and 1944 to about 80 percent in 1961. All one can say is that this is consistent with a growing tendency to leave property to foundations, but the evidence is not conclusive.

The only tabulation of individual income tax charitable contributions by type of recipient was made for 1962 returns. It is summarized in table 4 which shows the increasing importance of the contribution deduction in the upper brackets, and particularly, the increasing importance of the contributions to "other organizations." This category covers literary, educational, and scientific foundations, libraries, museums, zoos, and other such institutions, including charitable foundations in general.

² Lampman has made the principal analysis of changes in the size distribution of wealth holdings over time. (Robert Lampman, "The Share of Top Wealth Holders in National Wealth," 1922-56, National Bureau of Economic Research, Princeton University Press.)

³ From about 33 percent to 26 percent, *ibid.*, p. 204.

⁴ Kahn, *op. cit.*, p. 225.