Accounting and Regulatory Requirements for Endowments, Contributions, Special Event Revenues including Gaming & Auctions

NYSAIS 2017 BUSINESS AFFAIRS CONFERENCE

Joseph R. Blatt, CPA
Partner
Session Overview

- Endowment Regulations
- Charitable Contributions
- Gift Acceptance Policy
- Gifts in Kind
- Auctions, Fairs and Gaming Activities
- Professional Fundraisers
- Q&A
Endowment Types

• Net assets with donor restrictions
  ▪ Permanently Restricted
  ▪ Temporarily Restricted
• Board Designated Endowments
Endowment Reporting

• NFPs will no longer separately report the underwater portion of endowments in unrestricted net assets

• Instead, they will present their entire endowment balance in net assets with donor restrictions and disclose in the aggregate:
  ▪ (1) the fair value of the underwater endowments
  ▪ (2) the original gift amount or the amount the NFP is required to maintain either by the donor or by law
  ▪ (3) the deficiencies of underwater endowments. NFPs also will have to disclose their policy on appropriations from underwater endowments and any related actions taken during the period
Endowment Reporting

- Board-designated Endowments
  - Need to disclose the purpose of board-designated endowment funds
  - Need to disclose any board actions that result in self-imposed limits on the use of these funds
  - Need to disclose separately transfers in to the funds
Disclosures

• Need to disclose the boards interpretation of the relevant state law (NYPMIFA)

• New – need to disclose whether the School will continue to spend if the fund is underwater

• New – need to report negative value in temporarily restricted portion of endowment for underwater funds
What is Restricted and for how Long?

- Restricted Resources
  - Corpus
  - Investment earnings
- What needs to happen to relieve the School of the donor’s restriction?
- Appropriations
  - Who can appropriate?
  - When should they appropriate?
- Releases
- Not sufficient to just appropriate funds
- Still need to fulfill donor’s restriction
Things to consider

• When should we start appropriating funds?
• Should we build a 5-10% reserve before appropriating funds.
• Board-designated endowment funds will not be available for purpose of reporting liquidity
• Update Endowment Policy with the Board
Charitable Contributions

- Gift Acceptance Policy
- Gifts in Kind
- Auctions, Fairs and Gaming Activities
- Professional Fundraisers
- Q&A
Charitable Contributions

• What constitutes a charitable contribution?
• Charitable contributions vs. Exchange transactions
• What is quid pro quo?
• How do we document compliance?
• Who is responsible for monitoring us?
What Is a Contribution?

“A voluntary, nonreciprocal transfer of cash or other assets that is made to an entity with no expectation of procuring a financial benefit commensurate with the amount transferred”
What is an Exchange Transaction?

• An exchange transaction occurs when one pays money and receives something of equal value in exchange

• Examples include:
  ▪ Goods or services
  ▪ Tuition payments
  ▪ Health care services
What Is Quid Pro Quo?

- A quid pro quo contribution is a payment made to a charity by a donor partly as a contribution and partly for goods or services provided to the donor by the charity
  - Special Events
Quid Pro Quo

• A School must provide a written disclosure statement to a donor of a quid pro quo contribution in excess of $75. For example, if a donor gives a charity $100 and receives a concert ticket valued at $40, the donor has made a quid pro quo contribution. In this example, the charitable contribution portion of the payment is $60. Even though the part of the payment available for deduction does not exceed $75, a disclosure statement must be filed because the donor's payment (quid pro quo contribution) exceeds $75. The required written disclosure statement must:

  ▪ Inform the donor that the amount of the contribution that is deductible for federal income tax purposes is limited to the excess of any money (and the value of any property other than money) contributed by the donor over the value of goods or services provided by the charity, and

  ▪ Provide the donor with a good faith estimate of the value of the goods or services that the donor received
Quid Pro Quo

- The School must furnish a statement in connection with either the solicitation or the receipt of the quid pro quo contribution. If the disclosure statement is furnished in connection with a particular solicitation, it is not necessary for the School to provide another statement when the associated contribution is actually received.

- No disclosure statement is required if goods or services given to a donor have an insubstantial value, no donative value or only an intangible religious benefit.

- A penalty is imposed on a School that does not make the required disclosure in connection with a quid pro quo contribution of more than $75. The penalty is $10 per contribution, not to exceed $5,000 per fund-raising event or mailing. The charity can avoid the penalty if it can show that the failure was due to reasonable cause.
Example

- A parent contacts the School and notifies them that they are moving overseas in January and as a result is removing their child from the school at the end of December.
- The parent wants to donate the second half of the year's tuition to the school since he knows it is not refundable.
- Not a voluntary transfer.
- Not a contribution.
Token Exception

• Insubstantial goods or services a School provides in exchange for contributions do not have to be described in the acknowledgment.

• Goods and services are considered or be insubstantial if the payment occurs in the context of a fund-raising campaign in which a School informs the donor of the amount of the contribution that is a deductible contribution, and

• The fair market value of the benefits received does not exceed the lesser of 2 percent of the payment or $96, or

• The payment is at least $48, the only items provided bear the School's name or logo (e.g., calendars, mugs, or posters), and the cost of these items is within the limit for "low-cost articles," which is $9.60

• Religious services are viewed as intangible and do not constitute goods or services.
Written Acknowledgement

- Name of School
- Amount of cash contribution
- Description (but not the value) of non-cash contribution
- Statement that no goods or services were provided by the School in return for the contribution, if that was the case
- Description and good faith estimate of the value of goods or services, if any, that an School provided in return for the contribution
- Statement that goods or services, if any, that a School provided in return for the contribution consisted entirely of intangible (religious) benefits, if that was the case
Donor Receipts

• The donor is responsible for obtaining a written acknowledgment from a charity for any single contribution of $250 or more before the donor can claim a charitable contribution on his/her federal income tax return.

• However, the IRS does require you as a School to provide a written disclosure to a donor who receives goods or services in exchange for a single payment in excess of $75.

• Each School should send out contribution statements or make them readily available for anyone who requests one.
Substantiation

• The receipt must include the nonprofit's name, the donor's name, the date(s) of the donation(s), and the amount(s)

• It must also contain a statement explaining whether the charity provided any goods or services to the donor for the donation. If no goods or services were provided, you would include wording such as: "You did not receive any goods or services in connection with these contributions other than intangible religious benefits"
Example

- Thank you for your donation of $500 to The ABC School’s Scholarship fund received on December 15, 20XX. No goods or services were provided in exchange for your contribution.
Example

- The School has their annual gala. They estimate the fair value to the dinner to be $100 per person. They sold 300 tickets at a price of $250 per person. In addition, the School received sponsorships of $40,000 from corporation they solicited. The gala cost the School $40,000

- Total revenue raised $115,000. (75,000+40,000)

- Total deductible contributions $85,000 (150 * 300= 45,000 +40,000)

- Total non-deductible contributions $30,000 (100*300)

- Total expenses $40,000

- Net profit $75,000
Fair value of exchange transaction

• What is the fair value of an exchange transaction?
  ▪ Annual Gala
  ▪ Auction
  ▪ Cocktail party
• Why is this important?
• What are some metrics you can use?
Thank You Letter

• Mr. and Mrs. Smith
• Thank you for purchasing two tickets to the ABC School Gala on April 1, 2014 for $500
• The estimated fair value of the dinner was $200
• $300 of your purchase price is tax deductible

• Penalty for not properly reporting $10 per donor. Max $5,000 per event.
Example

• The School has a fund drive and is offering a free tee shirt, mug or umbrella with the School’s logo on the front to all parents who donate $100 or more to the drive. As a bonus, for all donations of $500 or more to the drive the School will give the parent all three items. The cost of each item to the School is $8.50

• If parent A donates $100 how much is deductible?
  • $100

• If parent B donates $500 how much is deductible?
  • $490 ($500*2%=10)
Direct Benefit to Contributor

• Why does it matter?
• How do you value benefit?
• How is it presented in a School’s financial statements and 990?
• Why is the net income reflected differently between the two?
Reporting Special Events to IRS

- IRS Form 990
  - Part V – IRS and Tax Compliance
    - Question 7a&7b “quid quo pro” compliance questions:
      - Did the organization receive payments in excess of $75 made partly as a contribution and partly for goods and services?
      - Did the organization notify the donor of the value of the goods and services received?
  - Schedule G, Part II
    - Breakdown of revenues
    - Breakdown of expenses
# Special Events -990 Schedule G

<table>
<thead>
<tr>
<th></th>
<th>Event # 1</th>
<th>Event # 2</th>
<th>Other Events</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 Gross receipts</td>
<td>115,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2 Less: contributions</td>
<td>85,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3 Gross income</td>
<td>30,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4 Cash prizes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5 Noncash prizes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6 Rent/facility costs</td>
<td>40,000</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7 Food &amp; beverages</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8 Entertainment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9 Other direct cost</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Net</strong></td>
<td></td>
<td></td>
<td></td>
<td><strong>-10,000</strong></td>
</tr>
</tbody>
</table>
Endowment Regulations
Charitable Contributions

Gift Acceptance Policy

Gifts in Kind
Auctions, Fairs and Gaming Activities
Professional Fundraisers
Q&A
Gift Acceptance Policy

• Why have a policy?
• What should the policy cover?
  ▪ Stock donations
  ▪ Establishment of restricted or endowment funds
  ▪ Non-cash donations
  ▪ Who can accept a gift on behalf of the School
  ▪ Conflict of interest
  ▪ Alignment of gift with mission
  ▪ Contributed services
  ▪ Naming rights
Gift Acceptance Policy

• What to consider in developing a School’s Policy
  ▪ Will the School be required to hold the gift for a period of time before you can sell it?
  ▪ Will there be costs or risks in holding or selling the gift?
  ▪ Who will pay these costs?
  ▪ Are there long-term implications to maintaining property such as a land easements?
Gift Acceptance Policy

• Who should develop the School’s Policy?
  ▪ Board of Trustees
  ▪ Development
  ▪ CFO
  ▪ Head of School
  ▪ Legal Council

• Will our Policy be Internal or External?
Gift Acceptance Policy

• Things to consider
  ▪ What is the minimum dollar amount of a non-cash gift that we will accept?
  ▪ Who should make the final decision on whether to accept the gift?
  ▪ Minimum donations for a restricted donations for existing programs and a new program
  ▪ Minimum donation required to establish an endowment fund
  ▪ Special attention to gifts in kind and special events (next two sections)
  ▪ Parents Association activities on behalf of the School
  ▪ What happens if the donor’s reputation gets soiled?
  ▪ How restricted is the donation?
Endowment Regulations
Charitable Contributions
Gift Acceptance Policy
Gifts in Kind
Auctions, Fairs and Gaming Activities
Professional Fundraisers
Q&A
Gifts in Kind

- There are several types of gifts in kind a School may receive
  - Property for the use of the School
  - Property for resale
  - Use of property (not ownership) only
  - Discounted or free services
  - Volunteers or employees paid by others
Gifts in Kind

• The Financial Accounting Standards Board (FASB) has determined that volunteer time can only be accounted for on the School’s financial statements if the volunteer provided a service that required a specialized skill that they possessed and, if the service had not been donated, the School would have had to have purchased it.

• A lawyer accompanying the third grade field trip as a chaperone would not qualify.

• A lawyer provides pro-bono legal services does qualify.

• A lawyer gives a reduced rate for his non-profit clients does not qualify.
Valuing Volunteers

• Currently, 63 million Americans volunteer about 8 million hours of their time, talent, and effort. Americans are contributing approximately $193 billion dollars of their time to charity based on a research report by the Corporation for National and Community Service.

• The 2016 estimated value per hour for volunteer time was $24.14 based on a report by Independent Sector.

• The 2016 value for local states are as follows:
  - NY $28.06
  - CT $29.29
  - NJ $24.46
IRS Form 8283
(non-cash charitable contributions)

• For non-cash donations over $5,000, the donor must attach Form 8283 to the tax return to support the charitable deduction. The donee must sign Part IV of Section B, Form 8283 unless publicly traded securities are donated. The person who signs for the donee must be an official authorized to sign the donee's tax or information returns, or a person specifically authorized to sign by that official. The signature does not represent concurrence in the appraised value of the contributed property. A signed acknowledgement represents receipt of the property described on Form 8283 on the date specified on the form. The signature also indicates knowledge of the information reporting requirements on dispositions. A copy of Form 8283 must be given to the donee.
IRS Form 8282
(donee information return)

• Form 8282 must be filed within 125 days after the disposition. A copy of Form 8282 must be given to the previous donor. If the School fails to file the required information return, penalties may apply.

• If the value of the donated property exceeds $5,000, the donor must get a qualified appraisal for contributions of property (other than money or publicly traded securities). The donee School is not a qualified appraiser for the purpose of valuing the donated property. For more information, get Publication 561, Determining the Value of Donated Property.
Example

- A parent at the School donates a Work of Art to the school
- The parent attaches an appraisal from a local appraiser valuing the item at $7,500
- The School decides to sell the Work of Art at an upcoming Sotheby's auction
- The Work of Art sells for $4,500
- The School is required to inform the donor and the IRS of the sale.
Thank You

• Thank you for your donation of Painting A that ABC School received on February 12, 2014. No goods or services were provided in exchange for your contribution.
Auctions, Fairs and Gaming Activities
Auction Sales

• Certain sales made at traditional and remote auctions by religious, charitable, educational, or other exempt Schools are subject to sales tax.

• A traditional auction is an auction where any bidders or their representatives are physically present. This is so, regardless of whether bids are also accepted by telephone, over the Internet, or otherwise. Sales of taxable items of tangible personal property made by religious, charitable, educational, or other Schools at a traditional auction are considered sales made from a shop or store operated by the School and are subject to tax if made with a degree of regularity, frequency, and continuity. A single traditional auction event is any day or portion of a day during which a traditional auction sale takes place.
Auction Sales

- If an School conducts no more than two traditional auction events during a calendar year, sales made at these events are not considered to be made with a degree of regularity, frequency and continuity from a shop or store and are not subject to tax, provided:
  - The exempt School does not otherwise make sales of similar (though not necessarily identical) items at a shop or store; and
  - The auction events are not conducted on the premises of a commercial auction house or on any premises where an auctioneer is conducting other auction sales
Auctions

- Auctions
  - Generally auction items are donated
  - Depending on the item, the final auction proceeds may exceed the fair value of the item
  - To the donor of the item we should not value the item
  - To the winner of the auction, we should inform him/her of the fair value as stated on the auction brochure or bidding sheet and the amount he/she paid and a description of the item
  - Generally, items such as, “lunch with the math teacher” are deemed “priceless” and considered to have no fair value (other than the cost of lunch)
Example

• The School has an auction at their annual gala. A parent donates two tickets to a NY Jets football game. The tickets cost $140 each. They are auctioned off for $200 each. How are these two transactions recorded?

• Donation of tickets
  ▪ Dr. Inventory $280
  ▪ Cr. Donation $280

• Purchase of tickets
  ▪ Dr. Cash $400
  ▪ Cr. Inventory $280 Donation $120
Fairs

• Fairs
  - Generally fairs include sales
  - New York’s sales and compensating use tax does not have a specific exemption for fundraising sales. Rather, it provides a general exemption for any sale or amusement charge by a qualified exempt School (generally IRC 501(c)(3) Schools) with the exception of:
    - sales of tangible personal property made at a shop or store operated by the School
    - sales of food or drink in or by a restaurant operated by the School
    - sales of hotel occupancy; and
    - sales of parking services
Example

• The School has a book fair and invites parents and students to attend. At the fair the school hold a raffle for a new bike worth $500. The school charges $10 for each ticket. The School sells 100 raffle tickets

• How much is deductible?

• None
Raffles & Other Gaming Activities

- Types of Gaming Activities
- Reporting requirements
- State regulation
- IRS regulations
- Internal Controls over gaming
- Regularly carried out
- Raffle tickets cannot be sold by students under 18 years of age
Types of Gaming Activities

- Raffles
- Bingo
- Lotteries
- Pull tabs
- Scratch-off
- Texas Hold’em
- Other games of chance
Reporting Requirements

• Gaming does not have a “contribution” component
• Gaming is never tax deductible
• Gaming does not include Auctions or Sales
• Winnings are taxable (Form W-2G)
• Withholdings are required for prizes over $5,000
• Withholding at 25% of winnings (Aliens 30%)
• Need to obtain social security number
• If winner does not pay taxes on prizes, School is liable
IRSA Form 990

• Gaming is reportable as a separate item on the 990
• Reported in Section VIII, line 9 as well as on Schedule G Part III
• Volunteer Labor
  ▪ Yes/No
  ▪ Percentage
• Enter the states the Organization conducts gaming activity
• Is the Organization licensed to conduct gaming activities in these states
• Easily accessible by IRS and state agencies
Unrelated Business Income Tax (UBIT)

• The following three conditions must be met before an activity may be classified as an unrelated trade or business regularly carried on:
  • The activity must be considered a trade or business
  • The activity must be regularly carried on
  • The activity must not be substantially related to the organization’s exempt purpose. (The fact that the activity generates income for the organization to spend on its charitable programs does not make the activity related to the organization’s exempt purpose)
Exceptions

• Even if a gaming activity meets the three-part UBI definition, there are some other exceptions that may apply. These include:
  ▪ Certain bingo games
  ▪ Activities conducted with substantially all volunteer labor; (unofficial rule 85%)
  ▪ Qualified public entertainment activities
  ▪ Games of chance conducted in North Dakota
State Regulations

• Most states have reporting and regulatory requirements over gaming activities
• New York requires Non-Profit Organizations to register and maintain separate bank accounts for gaming activities
### Form 990 Schedule G Part III

<table>
<thead>
<tr>
<th></th>
<th>Bingo</th>
<th>Pull Tabs</th>
<th>Other Gaming</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Gross revenue</td>
<td></td>
<td></td>
<td>5,000</td>
<td>5,000</td>
</tr>
<tr>
<td>Cash prizes</td>
<td></td>
<td></td>
<td>$1,500</td>
<td>1,500</td>
</tr>
<tr>
<td>Noncash prizes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Rental facility cost</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other direct exp</td>
<td></td>
<td></td>
<td>300</td>
<td>300</td>
</tr>
<tr>
<td>Net Gaming income</td>
<td></td>
<td></td>
<td></td>
<td>3,200</td>
</tr>
</tbody>
</table>
What is Considered a Raffle?

• A raffle shall mean and include those games of chance in which a participant pays money in return for a ticket or other receipt and in which a prize is awarded on the basis of a winning number or numbers, designated on the ticket or receipt, determined by chance as a result of a drawing from among those tickets or receipts previously sold.

• Raffles also include 50/50 and split interest pots.
What is Regularly Carried Out?

• The frequency of the activity
• The length of time it has continually conducted the activity
• How it promotes the activity, and
• How nonexempt businesses conduct similar activities
Fundraising Sales

- Fundraising sales are often made through door-to-door solicitation or by distributing order forms or catalogs to prospective customers. Whether these types of sales are subject to tax depends on whether the exempt School has title to the product at the time it is sold. If the exempt School purchases the merchandise from a vendor and then sells it to its customer, the sale is not subject to sales tax because the exempt School has title to the merchandise and the sale is not made by a shop or store or by remote means.

**Example:** A youth basketball league that is an exempt School sells decorative candles for its annual fundraiser. League members solicit sales only through door-to-door visits, showing potential customers a brochure of the various candles available for purchase. The league members take orders and collect payment from their customers at the time of the door-to-door visit. Orders are not placed by the customers by mail or by telephone or over the Internet. The league then purchases the candles from a supplier and arranges for delivery of the candles to its customers. Sales of the candles by the youth basketball league are not subject to tax since the league has title to the candles and the sales are not made from a shop or store and are not sales made by remote means.
Fundraising Sales

If the exempt School does not acquire title to the product being sold, but merely solicits the sales, collects the selling price of the product from the customer, gives the money to the company selling the product, and the product is delivered to the customer, the exempt School is considered to be acting as a sales representative of the company that is selling the product. Since title to the product passes from a vendor required to collect sales tax directly to the customer, the sale is subject to sales tax. When collecting the selling price from the customer, the exempt School must also collect the appropriate sales tax on behalf of the company, unless the company is also an exempt seller or the sale is exempt for some other reason. The company is required to be registered for sales tax purposes and is ultimately responsible for the collection and remittance of the sales tax to the Tax Department.
Internet Sales

- Internet sales means sales effected via the Internet. For example, these could be sales made from an exempt School's online or virtual store, which may be accessed on the School's website or some other website. If the exempt School sells goods or services on its own website or if the School sells its goods and services through an online store which is hosted by another website, and the School makes such sales on a regular, frequent and continuous basis, then the School's Internet sales are subject to sales tax.
Professional Fund Raisers

• Approximately 45 of the 50 states have some form of statutory fundraising regulations

• Reporting of fundraising activities are both in the 990 (schedule G) and in most state filings

• Besides the School, professional fundraisers as well as fundraising counsels are required to register and report activities to the states they operate in
New York

- Fundraising professionals are required by law to register annually and file fundraising contracts with the Attorney General's Office. Additionally, depending on the nature of their activities, financial reports must also be filed. These include:
  - Professional Fundraiser
  - Fundraising Counsel
Professional Fund Raiser

• “Any person who directly or indirectly, for compensation or other consideration:
  
  ▪ (a) plans, manages, conducts, carries on or assists in connection with a charitable solicitation or who employs or otherwise engages on any basis another person to solicit from persons for or on behalf of any charitable organization
  
  ▪ (b) solicits on behalf of a charitable Organization
  
  ▪ (c) who advertises that the purchase or use of goods, services, entertainment or any other thing of value will benefit a charitable organization but is not a commercial co-venturer
Fundraising Council

- Any person who for compensation consults with a charitable organization or who plans, manages, advises or assists with respect to the solicitation of contributions for or on behalf of a charitable organization, but who does not have access to contributions or other receipts from a solicitation or authority to pay expenses associated with a solicitation and who does not solicit
Useful Resources

- IRS Notice 1335 (Gaming Activities)
- IRS Publication 1771 – Charitable Contributions-Substantiation and Disclosure Requirements
- IRS Publication 561 – Determining the Value of Donated Property
- fundraisetaxlaw.org
- www.gambling-law-us.com/charitable-gaming
LOEB & TROPER LLP

Endowment Regulations
Charitable Contributions
Gift Acceptance Policy
Gifts in Kind
Auctions, Fairs and Gaming Activities
Professional Fundraisers
Q&A
Thank you for participating. We will now commence the Q&A session.

If time does not permit us to answer your question or if you have any follow-up questions, please contact:

Joseph R. Blatt, CPA, Partner
jblatt@loebandtroper.com
212-867-4000 x253
Joseph Blatt, CPA
Partner

Joseph Blatt, joined Loeb & Troper LLP in 1986 and has been actively engaged in work with both health care and not-for-profit organizations ever since. Mr. Blatt provides both audit and consulting services to a variety of organizations, including private schools and other educational institutions as well as nursing homes, housing, immigrant services, social services organizations, drug rehabilitation, museums and cultural arts centers, fund-raising organizations, foundations, senior citizen centers and religious organizations.

Mr. Blatt has also provided audits in accordance with Government Auditing Standards, OMB Circular A-133, HUD Audit Guide and other government requirements. Mr. Blatt participates closely with his clients on an on-going basis, not only on accounting and auditing problems, but also in various managerial and consulting roles, including budgeting, cash flow forecasting, development of accounting controls, development of accounting policy and procedure manuals, management problem solving, and as a board advisor.

Joseph Blatt received his degree from Queens College with a B.A. degree in accounting in 1986, and subsequently obtained his CPA in 1988. He is a member of both the American Institute of Certified Public Accountants (AICPA) and the New York State Society of Certified Public Accountants (NYSSCPA). Mr. Blatt frequently presents at training and educational seminars on auditing, accounting and reporting of not-for-profit and health care organizations.