## Charitable Contributions, Endowments and Inequality in Higher Education

Damien Capelle

Princeton University

## Introduction

- ... are extremely unequally distributed across colleges
- ... are subject to special tax treatment
  - Income tax deduction for charitable contributions
  - Endowments are tax exempt
- ... (increasingly) attracts a lot of public attention
  - Tax avoidance for the wealthy
  - Income tax deduction is a regressive subsidy
  - Strong positive correlation between average parental income of students and amount of donations/endowment income  $\Rightarrow$  Very local redistribution
  - Adversely affects hiring incentives and behaviors of colleges: legacy, sports
  - Inefficient hoarding of endowment

#### What I do

- Gather and construct facts about distribution of donations and endowments
  - Classical measure of distribution: Gini, top share
  - Document origin and destination of flows of donations
- Tractable framework that links
  - donations, endowments,
  - allocation of students across colleges,
  - income distribution, intergenerational mobility
- Use the theory to examine effects of tax regimes regarding charitable contributions and endowments
  - Focus mainly on distributional implications
  - Implications for sorting of students across colleges
- Key modeling difference with Capelle (2019)
  - Allow colleges to build L-T relationships with donors
  - ...and accumulate wealth over time

#### **Empirical Findings**

- Donations & Endowm. extremely unequally distributed across colleges
  - Gini donations and endow. is .7 and .8 resp. (HH income is .45)
  - Correlated with other college revenues: amplifies dispersion resources
- Disproportionately benefit students from rich families
  - Tax regime (deduction for donation and tax exemption for endowment) is regressive

#### **Theoretical Findings**

- Deduction for Charitable Contributions has ambiguous effect on sorting of students, income ineq. and mobility. Through 3 channels
  - 1. Relax reliance of colleges on tuition (more merito. admissions)
  - 2. Increases incentives to attract students who will be generous donors
  - 3. Increases inequality of resources across colleges
- Tax exemption of endowments also have an ambiguous effect: (1) vs (3) but (2) disappears.

#### Literature

Theoretical and structural literature

- Transmission of human capital, social mobility and inequality Becker et al. (1986), Fernandez et al. (1996), Benabou (2002)
- Pricing behavior of colleges and sorting Rothschild et al.(1995), Epple et al.(2006, 2017), Cai et al.(2019) More.
- Higher education in structural GE Restuccia et al. (2004), Abbott et al. (2013), Lee et al. (2019), Capelle (2019)

Empirics of Charitable Contributions and Endowments

- Charitable contributions and tax regimes Clotfelter (1997,2017), Duquette (2016), Landais and Fack (2012)
- College endowment accumulation behavior Tobin (1974), Hansmann (1990), Brown (2018)

Introduction

Stylized Facts

The Model

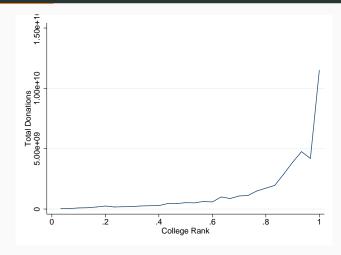
Extension with Endowment

Quantitative Analysis (skip today)

Conclusion

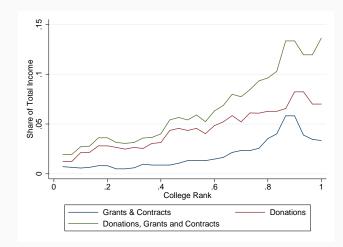
## **Stylized Facts**

#### Donations by College Rank (enroll. weighted)



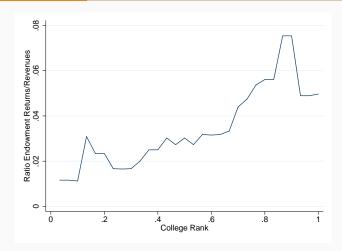
Rank colleges quality by total spending per student. Weighted by enrollment. Sources: IPEDS, 2016, own computations

# Donations as a Share of Tot. Revenues by College Rank (enroll. weighted)



Sources: IPEDS, 2016, own computations

# Endow. Revenues as a Share of Tot. Rev. by College Rank (enroll. weighted)

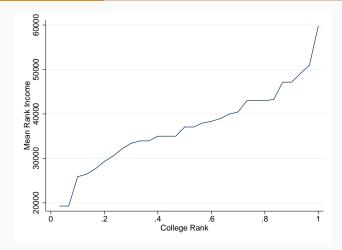


Sources: IPEDS, 2016, Nabuco Study of Endowment, own computations

Rate of Returns

Stock of Ende

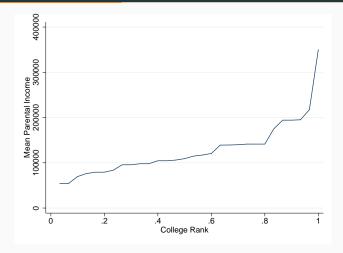
#### Kid Mean Income by College Rank (enroll. weighted)



Legend: The mean income of kid who attended a college at the 20% percentile is slightly below 30000.

Sources: Opportunity Insights, own computations Rank

#### Parental Mean Income by College Rank (enroll. weighted)

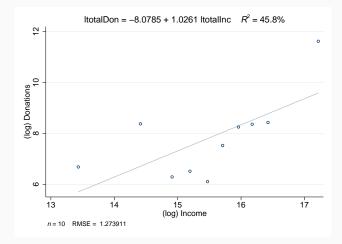


Legend: The mean parental income of a kid in college at the 20% percentile is slightly below 100000.

Sources: Opportunity Insights, own computations Rank

11/28

#### Elas. of HH Donations to Higher Ed. w.r.t. their Income is 1

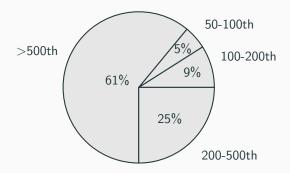


Legend: (log) average gross income of HH in 7th decile is 16 and they donated 8.2 in log average donations.

Sources: Philanthropic Panel Study, PSID, 2007, own computations Proba Giving 12/28

#### Subsid. to Charit. Donations to Higher Ed. by Income

- 95% of donations to higher ed. are fully subsidized through deductions on income tax  $\simeq$  \$25*Mn* in 2011
- Mainly benefit large income donors: 61% of subsidies goes to HH with AGI> \$500th



Legend: HH with AGI between 200 and 500 thousand dollars received 25% of all income tax deductions.

Source: CBO, IRS, own computations

Outline

- Continuum of heterogeneous households: choose colleges and donate
- Colleges
- Government implements progressive income taxation with deduction for charitable donations

Households

#### Households (simplified model, no government)

• Parent with HK h, Kid with ability  $h_s$ 

 $h_s = (\xi_b h)^{lpha_1}$  Child's High School Ability

• Market earning function:

 $y = Ah^{\lambda}\ell$  Earning Function

• Consumption, College Quality and Donation subject to Lifetime BC

 $y = c + e(q, y, h_s) + d$  Household Lifetime Budget Constraint

• HH has propensity to donate  $\zeta$  to its alma mater j

HH solves

 $\ln U(h, h_s, j, \zeta) = \max_{c, \ell, q, d} \left\{ (1 - \beta) \left[ (1 - \zeta) \ln c + \zeta \ln d - \ell^{\eta} \right] + \beta E \left[ \ln U(h', h'_s, j', \zeta') \right] \right\}$   $\text{with} \quad h' = h_s q^{\alpha_2} h^{\alpha_3} \xi_y \quad \text{Child's Post-College Human Capital}$   $\ln \xi_b \sim \text{i.i.d.} \mathcal{N} \left( \mu_b, \sigma_b^2 \right) \qquad \ln \xi_y \sim \text{i.i.d.} \mathcal{N} \left( \mu_y, \sigma_y^2 \right)$ 

Colleges

#### Colleges (simplified no endowment)

Technology: A college delivers a quality to its students

 $\ln q = \ln I^{\tilde{\omega}_1} \theta^{\tilde{\omega}_2} - H - \gamma_0 \zeta^{\gamma}$  Production Func. of Quality

with two inputs

$$\begin{aligned} &\ln \theta = E_{\phi(.)}[\ln(h_s)] & \text{Average Student Ability} \\ &p_l I = E_{\phi(.)}[e_u(q,h_s,y)] + D & \text{Educational Services} \end{aligned}$$

**Objective:** Taking the tuition schedule  $e(q, y, h_s)$  and p' as given, a college solves

$$\begin{array}{l} \max_{I,\theta,Y,D,\phi(.),\zeta'} \ln \mathcal{V}(D) = \ln q + \beta \ln \mathcal{V}(D') \\ \text{with } D' = E_{\phi(.)} \left[ d'(\zeta') \right] \quad \text{Average Future Donations} \end{array}$$

Government

• Income tax deduction for charitable deductions

$$y = (1 - a^y) y_m^{1 - au^y} T_y e^{ au_d^{d} y}$$
 Household After-Tax Income

where  $T_y$  is a normalizing aggregate endogenous factor ensuring that  $a_y$ =average income tax rate.

- $\tau_d = 0$  = no tax rebate
- shifter of the progressive tax schedule (Benabou 2002, Capelle 2019)
- captures well actual income tax schedule

Equilibrium: Tuition Schedule, Sorting Rule and Law of Motion

- Steady-state
- Distribution of HK is log-normal
- Colleges are indifferent between all student types (interior F.O.C.)

#### **Tuition Schedule and Sorting Rule**

#### Proposition

In equilibrium, the sorting rule is given by

$$e^{u}(q, h_{s}, y) = h_{s}^{-\epsilon_{e,h_{s}}} y^{\epsilon_{e,y}} \kappa_{q} q^{\nu_{q}}$$
$$q(h_{s}, y) = \left(s_{t} y^{1-\epsilon_{e,y}} h_{s}^{\epsilon_{e,h_{s}}} \frac{1}{\kappa}\right)^{\frac{1}{\nu_{q}}}$$

$$\begin{split} \epsilon_{e,h_s} &= \frac{\tilde{\omega}_2}{\tilde{\omega}_1(1-\omega_D)} + \frac{\beta_u \omega_D}{(1-\omega_D)} \lambda (1-\tau^y) \\ \epsilon_{e,y} &= -\frac{\beta_u \omega_D}{(1-\omega_D)} \alpha_3 \\ \nu_q &= \frac{1-\tilde{\omega}_1 \omega_D \lambda (1-\tau^y) \alpha_2}{\tilde{\omega}_1(1-\omega_D) + \tilde{\omega}_1 \omega_D (1-\beta^u) \left(\frac{\lambda (1-\tau^y)}{\tau^m + \epsilon_{e,h_s}} + \left(\alpha_3 - \frac{\alpha_1}{\epsilon_A} \epsilon_I\right) \bar{\nu}_Y (\Sigma)\right)} \\ \omega_D &= \text{Share Donations In Colleges' Revenues} = \frac{\int D_j dj}{\int (E_j^u + D_j) dj} \end{split}$$

#### Step 1

• Increase in  $\tau_d \Rightarrow$  increase in  $\omega_D$ 

 $\omega_D$  = Share Donations In Colleges' Revenues =  $\frac{\int D_j dj}{\int (E_i^u + D_i) dj}$ 

#### Step 2

- Increase in  $\omega_D$  has ambiguous effects on sorting of students. Works through 3 channels:
  - 1. Relax reliance of colleges on tuition,  $\nu_q \uparrow$  (more merito. admissions)
  - 2. Increases incentives to attract students who will be generous donors  $\epsilon_{e,hs}, \epsilon_{e,y}\uparrow$
  - 3. Increases inequality of resources across colleges  $\nu_q\downarrow$

#### Intergenerational Mobility and Income Inequality

$$h' = \xi_y \underbrace{(\xi_b h)^{\alpha_1}}_{h_s} \left( \underbrace{\left( s_t y^{1 - \epsilon_{e,y}} h_s^{\epsilon_{e,h_s}} \frac{1}{\kappa} \right)^{\frac{1}{\nu_q}}}_{q} \right)^{\alpha_2} h^{\alpha_3}$$

$$\ln h' = \alpha_h \ln h + \ln \xi_y + \epsilon_A \ln \xi_b + X$$

with  $\alpha_{\rm h}$  the intergenerational elasticity.

$$\alpha_{h} = \alpha_{1} + \alpha_{3} + \alpha_{2}(\epsilon_{A} + \epsilon_{I})$$

$$= \underbrace{\alpha_{1}}_{\text{Before College}} + \underbrace{\alpha_{3}}_{\text{After College}} + \alpha_{2}(\underbrace{\frac{\epsilon_{e,h_{3}}}{\nu_{q}}}_{\text{Ability-Sorting Channel}} + \underbrace{\frac{1 - \epsilon_{e,y}}{\nu_{q}}}_{\text{College}})$$

Special case,  $\gamma_0 \rightarrow +\infty \Rightarrow$  no donation,  $\omega_D = 0$ 

$$\alpha_h = \alpha_1 + \alpha_3 + \alpha_2 \left( \omega_2 + \omega_1 (1 - \tau_y) \lambda \right)$$

#### **Result 1: Effect of Income Tax Deduction**

For reasonable parametrization

•  $\tau_d \uparrow \Rightarrow$  rise in income inequality, in IGE, in dispersion of college quality and in donations

But a priori ambiguous

#### **Result 2: Amplification of Rise in Inequality**

- Keeping ω<sub>D</sub>, share of donations constant, λ ↑⇒ rise in income inequality, in IGE, in dispersion of college quality and in donations
- $\lambda \uparrow \Rightarrow \omega_D \downarrow$

## **Extension with Endowment**

#### **Endowment (model)**

• College objective with love for wealth (Hansmann, 1990) and social objective

$$\max_{\substack{I,\theta,Y,D,\phi(.)\\\chi,\zeta',\mathcal{A}'}} \ln \mathcal{V}(D,\mathcal{A}) = \underbrace{\ln q + \omega_4 \ln \mathcal{A} - \tilde{\omega}_3 \ln Y}_{\text{Flow Value}} + \beta_u \ln \mathcal{V}(D',\mathcal{A}')$$

College Budget Constraint:

$$p_I I_j = E_{\phi(.)}[e_u(q, h_s, y)] + D_j + \chi_j \mathcal{A}_j$$

with  $\chi_i$  payout rate out of endowment  $\mathcal{A}_i$ .

• Law of Motion of Endowment

$$\mathcal{A}' = e^{\textit{rH}}(1-\chi)\mathcal{A}$$

• Progressive Taxation of Endow. ( $a_a$  is average rate,  $\tau_a$  is slope)

$$\mathcal{A}' = e^{rH} (1 - a_a) T_a \left[ (1 - \chi) \mathcal{A} \right]^{1 - \tau_a}$$

#### **Endowment** (characterization)

In the limit without donation,  $\gamma_0 \to +\infty$ :

$$\begin{split} \epsilon_{I} &= \tilde{\nu}_{q}^{-1} (1 \underbrace{-\omega_{A}}_{(1)}) \lambda_{t} (1 - \tau^{y}) \\ \epsilon_{A} &= \tilde{\nu}_{q}^{-1} \alpha_{1} \left( \frac{\omega_{2}}{\omega_{1}} \right) \\ \tilde{\nu}_{q}^{-1} &= [(1 - \omega_{A})\nu_{q}]^{-1} = \omega_{1} + \underbrace{\frac{\omega_{A}}{1 - \omega_{A}} \omega_{1} (1 - \tau_{u}) \bar{\nu}_{A}(\Sigma)}_{(2)} \\ \bar{\nu}_{A} &= \underbrace{\frac{\Sigma_{A}}}{\sqrt{\left(\alpha_{1} \epsilon_{e,h_{s},t}\right)^{2} \sigma_{b}^{2} + \left((1 - \epsilon_{e,y,t}) \lambda_{t} (1 - \tau^{y}) + \alpha_{1} \epsilon_{e,h_{s},t}\right)^{2} \Sigma^{2}}}_{\omega_{A}} = \text{Share Endowment Income in Total Higher Ed. Income} \end{split}$$

Ambiguous effect of increasing  $\omega_A$ 

- 1. increase in  $\omega_A$  relaxes reliance on tuition: decline in income-sorting channel,  $\epsilon_I$
- 2. increase in  $\omega_A$  increases inequality of resources across colleges if endowments initially more unequally distributed than tuition

#### Proposition

Assume  $\gamma_0 \rightarrow +\infty$ . In the limit where  $\omega_4 \rightarrow 0$ , endowment income is a vanishing share of total revenues, and if

$$\Sigma_{\mathcal{A}} \geq rac{\Sigma_{q}}{1+rac{lpha_{1}\omega_{2}}{\omega_{1}\lambda(1- au_{y})}},$$

then permanently increasing the love for wealth,  $\omega_4$ , and/or the market interest rate r, and/or decreasing the average endowment tax  $a_a$  and/or temporarily decreasing the progressivity of the endowment tax,  $\tau_a$  leads to

- an increase in the dispersion of human capital and income,
- an increase in the Intergenerational Elasticity of Income,
- an increase in the dispersion of college quality,

and the dispersion of endowment across colleges remains the same except in the case of a temporary decrease in the progressivity of the tax schedule  $\tau_a > 0$ , which decreases the dispersion of endowment.

## Conclusion

#### Findings

- Deduction for Charitable Contributions has ambiguous effect on sorting of students, income ineq. and mobility. Multiple channels
  - 1. Relax reliance of colleges on tuition (more merito. admissions)
  - 2. Increases incentives to attract students who will be generous donors
  - 3. Increases inequality of resources across colleges
- Tax exemption of endowments also have an ambiguous effect: (1) vs (3) but (2) disappears.

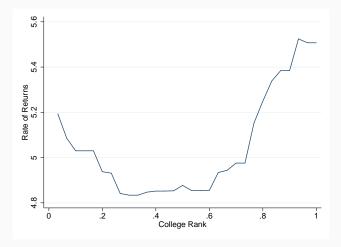
#### Future

- Quantitative findings: at this stage only hypothesis
  - 1. Donations & Endowm. contributes to accentuating income inequality because extremely unequally distributed across colleges .
  - 2. Improve allocation of students and efficiency
- Looking for ways to get implicit transfers of tax income deductions to colleges without relying on strong assumptions

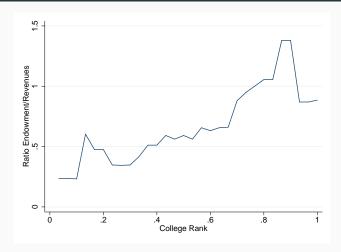
### References

## Appendix

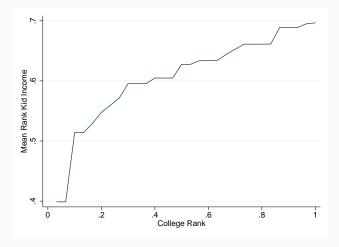
#### Rate of Returns on Endowment by College Rank (stud. weighted)



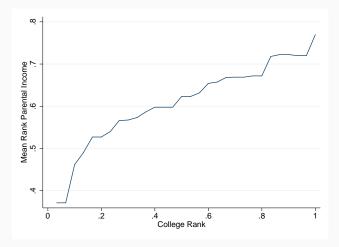
## Endowment as a Share of Tot. Rev. by College Rank (stud. weighted)



#### Kid Mean Rank Income by College Rank (stud. weighted)



#### Parental Mean Rank Income by College Rank (stud. weighted)



#### Proba. Giving by Income Rank

