



OPENING THE 990

INFORMATION AND TOOLS FOR DRIVING IMPACT

Mandatory 990 E-Filing An Introduction

One of the greatest sources of information on the nonprofit sector is the Form 990, which nonprofit organizations are required to file annually with the Internal Revenue Service (IRS) and make public upon request. The Taxpayer First Act, signed into law on July 1st, 2019, [mandates electronic filing](#), or e-filing, of the Form 990. The IRS must also make e-filed returns available in a “machine-readable” format, enabling the public to access and search these documents as never before.

This brochure is intended as a general introduction to the e-filing process. This communication is provided by the Aspen Institute for informational purposes only and does not constitute the rendering of legal, accounting, or other professional services. For questions regarding your organization’s specific circumstances, please consult a professional.

New IRS 990 E-Filing Requirement

Forms 990 and 990-PF with tax years beginning on or after July 2, 2019 must be filed electronically. Form 990 and 990-PF filings for tax years beginning before July 2, 2019 may still be on paper. Limited exceptions for the 2019 forms apply, which are described in the following pages. Forms 990-T with due dates on or after April 15, 2021 must be filed electronically. Form 990-EZ filers are provided transitional relief, and will be allowed to file by paper for one more year (generally for tax years ending before July 31, 2021). This [IRS News Release](#) (December 18, 2020) contains an additional summary of the e-filing requirements. The IRS will be sending an educational letter to organizations that previously filed paper forms to alert them to this change.

Your organization may choose to complete and e-file its return either through a paid tax preparer, or on its own. If your organization is filing on its own, you may use the software or web application of your choice, and many offer step-by-step procedures to complete the form. Regardless of the method you select to prepare your tax return, make sure it also provides options to electronically transmit your return to the IRS (either directly, as an [IRS-approved online provider](#), or indirectly, through an arrangement they have with an IRS-approved online provider). There is generally a fee for using one of these services. With these filing options, you are **not required** to apply for an Electronic Filing Information Number (EFIN), which involves a comprehensive IRS “suitability check.”*

* The IRS may provide large organizations (\$10 million in assets or more) with other e-file options as they are considered “large taxpayers.”



Benefits of E-Filing & Open Form 990 Data:

Communicating Nonprofit Stories



Open 990 data offers nonprofits the tools to advance public understanding of their organizations' missions, finances, and programs, through information that can easily be searched and analyzed.

Increased Nonprofit Transparency



Open 990 data allows nonprofit leaders, policymakers, and the public to understand trends in the field, measure where nonprofits stand in comparison to their peers, and make more informed decisions for their organizations.

Helpful Information for Donors



Open 990 data helps donors make more informed giving decisions by providing them with critical information on nonprofit missions, funding, governance, and more.

Opportunities for Innovation



Open 990 data makes possible the development of innovative tools and applications that help illuminate and solve problems in our communities.

Improved Filing Accuracy & Efficiency



E-filing reduces common errors in paper filing, such as inaccurate calculations. Identifying mistakes on the front end reduces the overall time spent on the filing process.

Improved Efficiency & Enforcement



E-filing lowers the costs of processing returns and enables the IRS to use resources more efficiently, thus saving taxpayer money. E-filing also allows for computer analysis, making fraud detection easier for charity officials.



Who Needs to File Electronically and When?

Tax Exempt Organizations Form 990 and 990-PF

	Organizations with Fiscal Years Ending on or Before June 30, 2020	Organizations with Fiscal Years Ending on July 31, 2020 and Later
990 and 990-PF E-Filing Process	The IRS will accept either paper or electronic filing of Forms 990 and 990-PF.	Forms 990 and 990-PF must be filed electronically unless subject to 2019 exceptions (pages 5, 7).

Tax Exempt Organizations Form 990-T

	Organizations with Returns Due Before April 15, 2021	Organizations with Returns Due on April 15, 2021 or Later
990-T E-Filing Process	The IRS will accept either paper or electronic filing of Forms 990-T.	Forms 990-T must be filed electronically.

Form 990-EZ Filers Have Option of Transitional Relief

	Organizations with Fiscal Years Ending Before July 31, 2021	Organizations with Fiscal Years Ending on July 31, 2021 and Later
990-EZ E-Filing Process	The IRS will accept either paper or electronic filing of Forms 990-EZ.	Forms 990-EZ must be filed electronically.



What Constitutes an Organization that May File a 990-EZ?

Organizations with annual gross receipts of less than \$200,000 and total assets at tax year-end of less than \$500,000.

Please Keep in Mind...

- Form 990, 990-PF, 990-T, and 990-EZ filers are to file by the 15th day of the fifth month after your organization’s accounting period ends, unless you have [requested an extension](#).
- Your organization may choose to complete and e-file its return either through a paid tax preparer, or on its own. If your organization is filing on its own, you may use the software or web application of your choice, and many offer step-by-step procedures to complete the form. Regardless of the method you select to prepare your tax return, make sure it also provides options to electronically transmit your return to the IRS (either directly, as an IRS-approved online provider from [this list](#), or indirectly, through an arrangement they have with an IRS-approved online provider). There is generally a fee for using one of these services. **With these filing options, you are not required to apply for an Electronic Filing Information Number (EFIN).**



Navigating the Tax Filing Process for **Form 990** Filers

The [2020 Form 990](#) is now available. Access instructions [here](#).

If you are filing the [2019 Form 990](#), access instructions [here](#). Note that limited exceptions to the e-filing mandate may apply for 2019 filers only. See page 5.





Abbreviated Exceptions for **2019 Form 990** Filers

Exceptions for 2019 (Not 2020) Form 990 Filers

- ✓ The name of the organization has been changed.
- ✓ Form 990 is for a short period because of an accounting period change.
- ✓ An application for exemption is pending.
- ✓ Form 990 is being filed before the end of the tax year.
- ✓ You attempted to file Form 990 electronically, but the return was rejected.

*For more detailed information on these exceptions, please reference the “When, Where and How to File” section of the 2019 Form 990 instructions [document](#) beginning on page six.



Navigating the Tax Filing Process for **Form 990-PF** Filers

The [2020 Form 990-PF](#) is now available. Access instructions [here](#).

If you are filing the [2019 Form 990-PF](#), access instructions [here](#). Note that limited exceptions to the e-filing mandate may apply for 2019 filers only. See page 7.





Abbreviated Exceptions for **2019 Form 990-PF** Filers

Exceptions for 2019 (Not 2020) Form 990-PF Filers

- ✓ The name of the organization has been changed.
- ✓ Form 990-PF is for a short period because of an accounting period change.
- ✓ An application for exemption is pending.
- ✓ Form 990-PF is being filed before the end of the tax year.
- ✓ You attempted to file Form 990-PF electronically, but the return was rejected.
- ✓ You are a foreign organization.
- ✓ You are a foundation in a 60-month termination under section 507(b)(1)(B).
- ✓ You are an exempt foreign foundation.

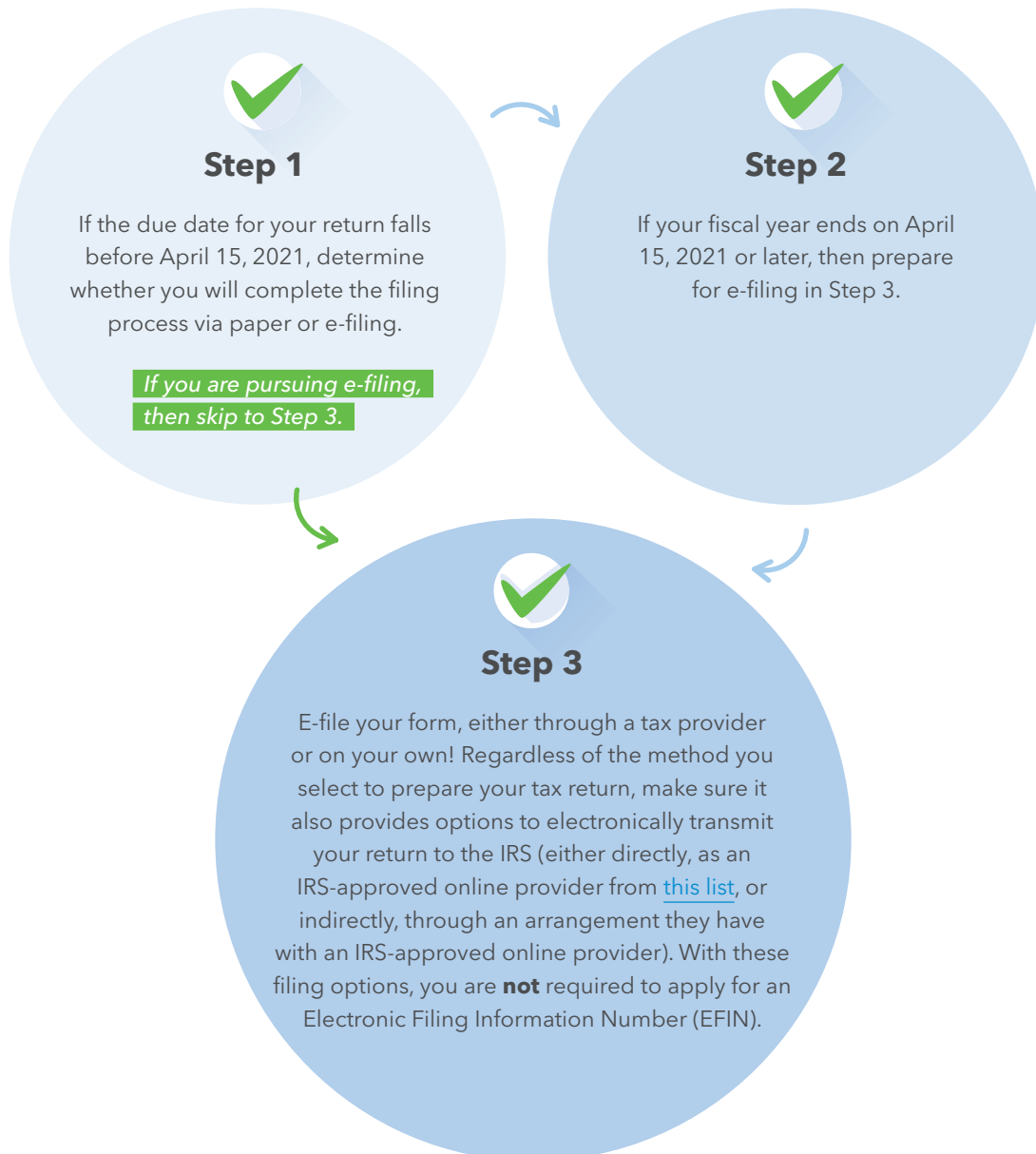
*For more detailed information on these exceptions, please reference the “When, Where and How to File” section of the 2019 Form 990-PF instructions [document](#) beginning on page seven.



Navigating the Tax Filing Process for **Form 990-T** Filers

Mandatory electronic filing of the 2020 Form 990-T is now in effect.

The [2020 Form 990-T](#) is newly available for e-filing of returns with due dates on or after April 15, 2021. Access instructions [here](#).





Navigating the Tax Filing Process for **Form 990-EZ** Filers

[Form 990-EZ](#) filers have the option of transitional relief and may delay mandatory e-filing until the dates noted below.

For more information on mandatory e-filing requirements, see the [2019 Form 990-EZ instructions](#) or the [2020 Form 990-EZ instructions](#).





About the Nonprofit Data Project

The Aspen Institute's Program on Philanthropy and Social Innovation (PSI) convenes leading figures in the field of nonprofit research to assess and improve the state of the nation's nonprofit data, thereby strengthening our understanding of the country's vast civil society. Convenings provide a unique forum for information-sharing, collaboration, and action.

Primary participants include representatives from the Center on Nonprofits and Philanthropy at the Urban Institute, Candid, the Lilly Family School of Philanthropy at Indiana University, and the Center for Civil Society Studies at Johns Hopkins University. We also work with a broad array of researchers, nonprofit data platforms, government officials, journalists, and others.

Together, these groups play a critical role in informing our society of the size and scope of the nonprofit sector, the level of charitable giving and volunteering, the contribution of the sector to the nation's economy, the level of employment in the nonprofit sector, nonprofit performance, and other important aspects of social sector activity.

PSI would like to thank the **Bill & Melinda Gates Foundation** for its continued support of the work we do in the social sector.

This communication is provided by the Aspen Institute for informational purposes only and does not constitute the rendering of legal, accounting, or other professional services. For questions regarding your organization's specific circumstances, please consult a professional.

PHILANTHROPY & SOCIAL INNOVATION



For more information on the Nonprofit Data Project, please contact:

Cinthia Schuman Ottinger
Deputy Director for Philanthropy Programs
Program on Philanthropy and Social Innovation
The Aspen Institute
cinthia.schuman@aspeninstitute.org

Updated: April 2021