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The efficiency of public support to private charity: An econometric analysis of the income tax treatment of charitable

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Kiel Working Papers

Working Paper No. 151

The Efficiency of Public Support to Private Charity.

An Econometric Analysis of the
Income Tax Treatment of Charitable Contributions in
the Federal Republic of Germany

by
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1. Some Aspects of the Theory of Charity Market Failure⁺

Economists like to justify public redistributive activity with standard externality arguments. While not denying the existence of a private charity market based on altruism, feelings of social responsibility, pure taste for giving or even egoistic speculation on future rewards to charity, they seriously doubt the efficiency of the market outcome. The prime reason for the presumed market failure lies in a peculiar feature of the charity market, namely the inherent division of consumption into a "material" component enjoyed by the donee and a "spiritual" component enjoyed by the donor precisely by making somebody else better off. For other potential donors this creates the chance for a free ride: as long as their preferences for giving at least partially depend on the well-being of the recipients - pure private good cases are excluded -, they adjust for others' transfers to the poor by reducing their own contributions to an "independent adjustment equilibrium level"¹ with marginal social utility greater than marginal cost of the transfers. Thus the overall level of charitable giving will remain below Samuelson's optimal public goods supply, and a case for public redistribution in the broadest sense (including the provision of welfare services) seems to be established.

This string of reasoning which has found its most elegant analytical shape in the work on the pareto optimal redistribution², correctly identifies the most compelling reason for a charity market failure³. Its policy conclusion, however, goes too far:

⁺The author is grateful to Ludwig Gutberlet, Klaus-Werner Schatz and Roland Vaubel for valuable comments on an earlier draft of the paper. Thanks are also due to Rolf Knudsen who mastered the computer work with a lot of patience and imagination.

¹This term is due to Buchanan (5), p. 11 ff.

²See Hochman & Rodgers (16), Fürstenberg & Mueller (13) et.al.

³Brennan (3) reveals another rationale for government intervention based on positive externalities between donors and donees. Paqué (19), in turn, doubts the validity of Brennan's argument.

from a neoclassical viewpoint, the internalization of externalities should always proceed by means of a policy which best preserves the desirable qualities of a decentralized market system. In this respect, a "socialization" of redistribution is inferior to a policy of subsidizing private charitable giving to extend the level of redistribution to the socially optimal level where the sum of all individual marginal utilities of the transfers equals their marginal cost¹. Such a policy preserves the individual freedom of choice inherent in any market activity; in contrast the compulsory public redistribution must resort to some complex public choice processes which frequently involve distinct violations of the basic Pareto efficiency criterion.

Of course, a policy of subsidization has to face serious information problems since both the amount and the incidence of the consumption externalities among different individuals are unknown. A subsidy scheme will thus most likely remain suboptimal, but so will a socialization of redistribution: as long as the state honestly pursues the aim of achieving an optimal provision of a public good he cannot escape the duty of somehow estimating the amount and incidence of the externalities involved. The informational requirement with respect to external effects is the same for both policies; hence no a priori argument in favour of socialisation can be derived on informational efficiency grounds².

Other efficiency arguments clearly favour some subsidy scheme over outright socialization. The deadweight loss of a governmental bureaucracy may well be cut back if individuals prefer to address their charitable giving to competing private welfare organisations with more efficient management and better knowledge of peculiar market conditions. This in turn may reduce the moral

¹This assumption is implicitly made in all studies on the optimal level and structure of tax subsidies to charity (Atkinson (2), Dean (8), Brennan (4), Hochman & Rodgers (17)).

²In fact the total informational requirement is larger for socialization as it requires estimates of the internal effects as well.

hazard problems which tend to cumulate in highly centralized anonymous redistribution systems¹. Finally the enlarged range of individual choice may stimulate overall economic activity just as particular tax or tariff cuts induce substitution and income effects that are likely to be conducive to economic growth. This gain in dynamic efficiency may be particularly important if an income progressive subsidy scheme is adopted (e.g. tax deductability in an income progressive tax structure) since this allows economic agents with growing income to avoid high marginal and average tax rates².

Without further discussion of these theoretical aspects going beyond the scope of this paper, it remains to be concluded that there are a number of most plausible economic rationales for subsidizing private charity instead of socializing redistribution. German tax authorities have cautiously adopted this view in § 10b of the Income Tax Law which reads: "Private giving to the advancement of charitable as well as ecclesiastical, religious, scientific and selected political purposes ... are deductible up to a limit of 5 per cent of gross income"³.

The main purpose of this paper is to test econometrically whether the deductability rule of German tax law can be called efficient in any meaningful economic sense. Section 2 of the paper develops a formal concept of "quantitative efficiency" which appears to be the appropriate framework for econometric modelling. Section 3 discusses some problems concerning the computation of the main variables and the estimation procedure. Section 4 presents the most

¹As Buchanan (6, pp. 364 ff.) puts it, decentralization through competition reduces the divergence between "the extent of morals" and the "extent of markets".

²This is not to say that an income progressive scheme is preferable to a flat-rate subsidy. From a static welfare viewpoint just the reverse is most likely true (see Hochman & Rodgers (17, pp. 7 ff.), Paqué (19, pp. 22 ff.)).

³See NWB-Textausgabe: Wichtige Steuergesetze, 27. Auflage, Berlin 1980, S. 35/36 (translation with minor changes: K.-H. P.).

reliable empirical results of alternative model specifications; these are compared to some estimates obtained by Feldstein in his econometric work on taxation and charity in the U.S. Section 5 develops some scenarios for promising reform proposals based on the previously derived econometric model. Section 6 concludes the paper with some final remarks on specific "German" problems of studying the impact of tax subsidies to charity.

2. The Concept of "Quantitative Efficiency"

In a broad welfare theoretic sense, the concept of efficiency lies far beyond any approach of empirical testing: it is simply not possible to know to any reliable degree either the amount or the incidence of all pareto relevant spill-over-effects due to bilateral charity transfers.

In a less ambitious framework, however, we may well be able to derive meaningful propositions about the state of efficiency of the charity market. Assuming

- that the given level of redistribution is optimal in the broad sense of externality internalization, and
- that private transfers are not inferior to an equal amount of public redistribution,

an unambiguous quantitative efficiency gain can be secured by a substitution of private giving for public expenditure at any given (optimal) level of overall redistribution (public + private transfers = const.!) if the cost (= tax spending) of subsidizing private charity is lower than the cost of financing a corresponding public expenditure program.

Of course, this concept of quantitative efficiency may be criticized on the basis of the realism of its assumptions.

First, the level of actual redistribution is certainly not optimal at any given point in time. A change of the level, however, should not in any way affect the efficiency of a substitution between public and private charity within a given amount of overall redistribution. The optimality assumption thus serves as an auxiliary device to allow unambiguous welfare judgements about structural shifts independent of moves towards or away from optimality in the level of redistribution. The weaker assumption of a constant level of redistribution would do as well provided that potential pareto improvements through shifts in the transfer level are explicitly excluded as parts of the welfare judgement.

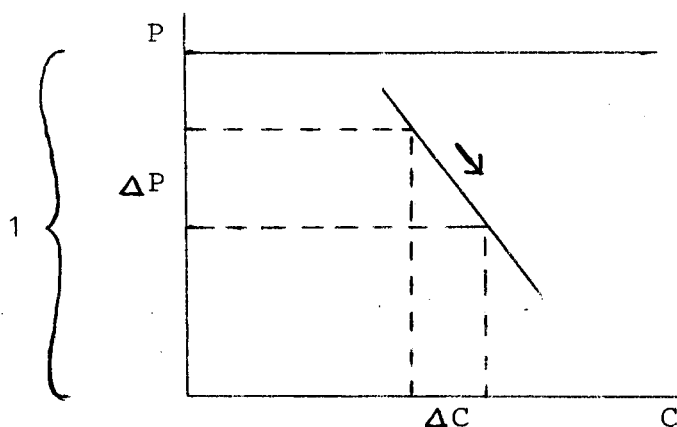
Second, the private allocation of charity funds will most likely differ from prior public redistributive pattern. From a neo-classical viewpoint this allocative change may be welcome as a genuine welfare gain due to a dismantling of distorted public choice processes. Even if this staunch theoretical view is not taken, there is good reason to believe that the state has ample opportunity for reestablishing the prior overall redistributive pattern via simple internal adjustment at lower levels of total social costs. Despite the striking variety of potential charity recipients named in § 10b of the German Income Tax Law - including political parties -, many recipients of private charity are also somehow financially supported by the state, frequently through budgetary items not summed under the label of welfare expenditure¹. Furthermore the actual level of private charitable giving - in 1974 around 660 Mio. DM - still amounts to a tiny part of total public expenditure, and it seems not at all unrealistic to assume that the "capacity limit" for indirect substitution via internal adjustment has not yet been reached. Hence private giving should be, at last in present day Germany, a close to perfect and in no way inferior substitute for public redistribution.

Backed up by reasonably realistic assumptions we are ready to derive optimality conditions for quantitative efficiency: A pareto

¹Political parties may be a good case in point.

improvement will be achieved by additional subsidies to private charity if the induced increase in private giving (and hence the induced reduction in public welfare expenditure) surpasses the additional amount of public subsidies so that the state can secure a (net) gain to be passed over to the citizens through reduced overall tax rates at an unchanged level of transfers.

Standard microeconomic monopoly theory is the appropriate tool to formalize this idea (fig. 1):



The state can vary the price p per unit of giving by varying the subsidy fraction $(1-p)$; just like a private monopolist he faces a more or less downward sloping demand curve which allows him to maximize social gain (G) defined as the difference between the sum of private charitable giving (C) and the sum of public subsidies.

Hence: $\text{Max } G!$

$$\begin{aligned} G &= C(p) - [1 - p] C(p) \\ &= p \cdot C(p) \end{aligned}$$

$$\begin{aligned} \frac{dG}{dp} &= C(p) + p \cdot \frac{dC(p)}{dp} \\ &= C(p) \left[1 + \frac{dC(p)}{C(p)} \cdot \frac{p}{dp} \right] \\ &= C(p) \left[1 + \eta_c \right]^1 \quad \text{with } \eta_c < 0 \end{aligned}$$

¹The formal analogy to the Amoroso-Robinson-Condition is obvious (see H. Varian (20), p. 53 f.).

G is maximized if $\frac{dG}{dp} = C(p) (1 + \eta_c) = 0$

$$\eta_c = -1.$$

If $\eta_c < -1 = \frac{dG}{dp} < 0$.

If $\eta_c > -1 = \frac{dG}{dp} > 0$.

Again analogous to private monopoly theory the optimal price/quantity-mix depends on the price elasticity of demand for charitable giving.

- If $\eta_c = -1$, the subsidy per unit of giving $(1-p)$ is just sufficient to maximize social gain;
- if $\eta_c < -1$, there is a positive marginal gain of exploiting the giving potential by raising the subsidy to some level above $(1-p)$;
- if $\eta_c > -1$, the subsidy should be lowered to exploit the inelasticity of the demand for giving¹.

Derived in a partial equilibrium framework these criteria neglect income effects that may arise from decreasing/increasing subsidies to private giving. As the ratio of private giving to gross income is extremely low in the F.R.G. - on average around 0.2 % in 1974 - the relevant income effects will be negligibly small except in cases of dramatic subsidy changes.

The primary purpose of the following empirical inquiry must be the estimation of price elasticities for the Federal Republic of Germany. Depending on the magnitude of these elasticities proposals for reform will be advanced. Methodologically the work comes close to prior econometric studies done by Feldstein & associates (2, 8, 9, 10, 11)

¹For an ingenious interpretation of the price elasticity of demand for charitable giving in terms of externalities between donors and donees, see Brennan (4). A critical review of Brennan's argument is given by Paqué (19, pp. 11 ff.).

and Clotfelter (6) for the U.S.¹.

3. The Econometric Model

The estimates are based on German income tax data for private giving pursuant to § 10b income tax law, disaggregated by fourteen gross income classes². These statistics tend to be published in three years intervals; the series starts in 1961 and for the time being ends in 1974³. Hence it is possible to estimate the average level of charitable giving per gross income class as a function of the average disposable income and the average "price of charity" in this class.

The various specification problems of this model will be described briefly.

3.1. Private Charitable Giving (C)

The specification of C appears to be straightforward: it is defined as the sum of private giving of the i-th gross income class divided by the number of tax returns in the class. Hence for each of the five years (1961, 65, 68, 71, 74) there are fourteen observations of the endogeneous variable.

¹The value of the seemingly trivial concept of the price elasticity of demand - obviously the theoretical core of all empirical studies on tax subsidies to charity - has been thoroughly questioned by Hochman & Rodgers (17, pp. 10 ff.). They argue that the concept is entirely worthless as a guide to policy makers since it does not yield any information on the amount of externalities to be internalized via public subsidies to charity. Correct as Hochman & Rodgers' judgement may be in a world without prior public intervention where government has first to solve the problem of finding an optimal transfer level, it is certainly too destructive in a world where public transfers already exist so that the prior transfer level can be taken as a starting-point for pareto improvements along the lines described above thereby assuming that both private and public redistribution are backed up by externality arguments. In my view, this is the approach adopted, albeit implicitly, by the above mentioned empirical studies.

²The term "gross income" is used synonymously to the German legal term "Gesamtbetrag der Einkünfte".

³See Statistisches Bundesamt, Fachserie L, Reihe 6I: Einkommens- und Körperschaftssteuer for 1961, 1965 and 1968; Statistisches Bundesamt, Fachserie 14, Reihe 7.1.: Einkommenssteuer for 1971 and 1974.

3.2. Disposable Income (Y and YT)

Specifying an appropriate income variable is far more troublesome. We need a comprehensive measure of the resources available to an individual for personal consumption or saving in a given year of taxation. Hence two basic questions stand out:

- What should be the gross income measure to arrive at the broadest feasible concept of a personal budget? (i)
- What should be the amount of taxes and other charges to be deducted from gross income to arrive at an appropriate disposable income measure? (ii).

(i) The use of an ideal permanent income measure is obviously not feasible in a world of tax data exclusively limited to current income concepts. As Feldstein has aptly pointed out, there is no bias from this specification error if the estimates are based on grouped data of current income, with the grouping correctly classifying taxpayers according to their current and permanent income¹. In the case of the grouped German income tax data, this will most likely be a realistic assumption since the inter-grouped variance of permanent income over the whole population of taxpayers is certainly large relative to its intragroup variance. Hence the bias should be negligably small. We are left with the broad concept gross income (GI) defined as the sum of all current income streams from all possible sources, and the narrow concept of taxable income (TI), loosely speaking defined as gross income minus the sum of all tax deductible items like tax exemptions for children, voluntary church taxes and compulsory property taxes, expenditure on vocational training and tax consulting, charitable giving etc.². Which of the two concepts is preferable for the purpose of computing the income variable in our model has to be decided on purely theoretical grounds. The choice crucially depends on the understanding of the term "disposable income":

¹Feldstein (9), p. 84.

²Precise legal definitions of both concepts are to be found in Statistisches Bundesamt, op.cit. (1974), p. 12.

- If we consider all tax deductible items as burdens taking away part of the taxpayer's income without being part of his consumption, we are bound to prefer the narrow concept of taxable income with its restricted consumption choice set.
- If, in turn, we consider the factual conditions underlying tax deductible items as the outcome of a voluntary, rational consumption choice, we must resort to the broad budget concept of gross income with all tax deductible items included.

I am strongly inclined to take the latter approach since in my view, nearly all tax deductible items are in the domain of individual decisionmaking on lifetime allocation of permanent income. Nevertheless, as there might be arguments in favour of either concept, the most important estimates of the empirical part of the paper will be carried out for both income variables¹.

To avoid spurious interdependencies between exogenous and endogenous variables, taxable income must be adjusted by adding the amount of deductible charitable giving. Of course, this need not be done with gross income which contains all tax deductible items including charitable giving.

- (ii) A measure of disposable income can be obtained by subtracting the income tax liability (TL) from GI and (TI + C) respectively. Three problems complicate the analysis:

- Once again, to avoid spurious interdependencies between exogenous and endogenous variables, we must not subtract the tax actually paid but rather a "fictitious" tax that would have been paid if the individual had not contributed to charity.

¹German tax law defines a third concept simply called "income" which is somehow a midway between the polar concepts of gross income and taxable income excluding "Sonderausgaben" (special expenses) but including "Außergewöhnliche Belastungen" (extraordinary burdens). As no clearcut view on consumption underlies the concept of "income", I have omitted it completely.

- In the F.R.G. two distinct tax schedules are commonly used to compute individual tax liabilities, namely the "basic schedule", primarily applied to singles, and the "splitting schedule", exclusively applied to couples if they itemize their income in one single tax return. As the two schedules mostly differ in average and marginal tax rates at any given taxable income, it is not possible to derive "fictitious" tax liabilities from aggregate data of taxable income. Instead we must resort to tax liability data¹.
- From 1968 to 1974, the German income tax was technically supplemented by a tax surcharge ("Ergänzungsabgabe") amounting to 3 p.c. of the income tax liability for taxpayers with yearly gross income above 16 000 DM. Although legally separated from the income tax, this compulsory surcharge may well have figured as an effective rise of income tax liability in the economic calculus of the individual taxpayer. To have a check on the sensitivity of the parameter estimates with respect to this redefinition of disposable income (and also price of charity!), the main calculations were carried out for both tax liability concepts, excluding and including the tax surcharge.

To solve these problems simultaneously the following tedious computation procedure was applied to each gross income class: The average actual tax liability TL was computed from income tax liability statistics. TL is a mean of all taxpayers in the class, regardless of how these individual tax liabilities have been computed. The basic tax schedule renders the marginal tax rate (MTR) at the actual tax liability TL corresponding to some "fictitious" taxable income TI_f . To compute the amount of taxes saved through charitable giving, the marginal tax rate was applied to the actual amount of contributions. The saved amount, in turn, was added to

¹Of course, there is a more general argument in favour of using tax liability instead of taxable income data: if the degree of progression changes within a given income class, the average tax liability of the class will reveal this fact while the tax liability of the average taxable income will not.

TL to arrive at the "fictitious" tax liability TL_f reflecting both the "splitting-effect" - via the actual tax liability - and the "fiction effect" - via the added amount of charity induced tax saving¹. TL_f is the appropriate variable to be subtracted from GI and $(TI + C)$ respectively.

In summary the whole procedure of computing the disposable income variable looks as follows:

1. step: computation of GI and $(TI + C)$ respectively
2. step: computation of TL
3. step: computation of MTR at TL (corresponding to TL_f)
4. step: computation of $S = MTR \cdot C$
5. step: computation of $TL_f = TL + S$
6. step: computation of $Y = GI - TL_f$ and
 $YT = (TI + C) - TL_f$ respectively.

In the calculations with income tax surcharge SU, a fictitious surcharge SU_f was computed by multiplying SU by the ratio of fictitious to actual tax liability. This procedure entails no perceptible bias since the ratio of SU to TL is almost constant over the relevant income range. SU_f was added to TL_f , and the sum of both replaced TL_f in the formula of Y and YT.

3.3. Price of Charity (P)

With the previous discussion in mind the specification of an appropriate price variable is fairly straightforward. Due to tax deductibility the price of private monetary transfers equals one minus the marginal tax rate ($p = 1-m$).

As the price of charity enters the economic calculus of the average taxpayer per gross income class at the level of the taxable

¹Due to the "discrete jumps" of tax liability in the tax schedule, C could not just be added to TL_f to read TL_f off the tax schedule. The direct application of the marginal tax rate to C promised more accuracy.

income he would attain if he did not contribute to charity, the marginal tax rate must be computed at the relevant fictitious taxable income ($TI_f + C$). This procedure is invariant to the choice of the exogenous income variable (Y or YT) in the econometric model since the individual economic calculus does obviously not depend on the broadness of the income concept.

To avoid some "technical" irregularities of the basic tax schedule that defy any meaningful economic interpretation¹, the marginal tax rate for discrete changes of 600 DM in the first ten gross income classes and 1 200 DM in the last four classes were used to calculate the price variable. For very small taxable incomes falling below 600 DM, the remaining tax liability was also divided by 600 resulting in correspondingly lower marginal tax rates.

In the econometric model including the tax surcharge SU_f , the effect of the surcharge on the marginal tax rate was taken into account by computing at $(TI_f + C)$ not the marginal change in TL_f , but the marginal change in $(TL_f + SU_f)$. As expected the tax surcharge slightly raised the marginal tax rate (i.d. lowered the price of charity) for all taxpayers with yearly gross income above 16 000 DM.

Two statistical complications could not be accounted for:

- The German income tax law sets an upper limit to deductability of charitable giving at 5 % of gross income, for giving to political parties even an absolute ceiling of 1 800 DM. These limitations do effectively raise the price of charity for taxpayers approaching one of the ceilings. Fortunately, the average

¹ So the marginal tax rate between two discrete current numbers (60 DM) fluctuates between 16,67 % and 20 % in some ranges of the tax schedule in use for the years 1965 to 1974; the "average marginal tax rate" (between ten current numbers in these ranges) is constant at 19 %. It would be absurd to interpret these kind of irregularities - hardly noticed by any taxpayer - as genuine realizations of the exogenous price variable in the econometric model.

ratio C/GI is extremely low in the F.R.G. (on average around 0,21 %, in the highest income class 0,57 %) so that the bias from this source is presumably very small.

- According to § 10b income tax law, the value of charitable donations in kind is deductible from taxable income¹. Thus realized capital gains may escape the taxes that would be levied in case of a sale of the asset in the current year. This in turn may lower the opportunity cost of donations in kind thus leading to a fall of the price of charity below the price of pure monetary transfers. Unfortunately, the lack of data prohibits any attempt of quantifying this effect in the case of Germany. It may be comforting, however, that Feldstein's attempt to incorporate a rudimentary measure of appreciated assets into his price variable did not significantly change his basic parameter estimates².

3.4. The Data

As noted above the German income tax statistics provide cross-section data for fourteen income classes and five years (1961, 65, 68, 71, 74) thus allowing the computation of 70 observations of the three variables. In the subsequent time-series-cross-section analysis, however, the observations of the first gross income class ($GI > 1\,500\text{ DM}$) will be omitted as the computation error is suspected to be prohibitively high relative to the negligibly low level of private giving in this class. Both private giving and disposable income are measured in constant 1970 DM by deflating with the consumer price index.

¹§ 10b (2) German Income Tax Law.

²Feldstein (9), pp. 93 f. He also discusses the theoretical problem at length (9, p. 84 f.).

3.5. Functional Form and Estimation Procedure

For the basic estimates a log-linear, constant elasticity specification of the form

$$(1) \quad \ln C = \beta_0 + \beta_1 \ln Y + \beta_2 \ln P + \varepsilon \quad \text{resp.}$$

$$(2) \quad \ln C = \beta_0 + \beta_1 \ln YT + \beta_2 \ln P + \varepsilon$$

was chosen, with ε being a random error term. In alternative specifications the restrictive assumptions were relaxed to allow for variable elasticities over some income ranges.

Equations (1) and (2) were first estimated by ordinary least squares (OLSQ); a weighted least squares procedure (WLSQ), described in section 4, was later introduced to improve the efficiency of the estimates.

4. Empirical Results

4.1. Estimates with "Gross Disposable Income" (Y)

The basic ordinary least squares estimate of (1) is given in table 1 as equation I. Despite the high adjusted R^2 - not unusual in regressions with grouped data - the estimate suffers from serious deficiencies: the test statistics indicate heteroscedasticity in both pooling characteristics (GI-class and time), intertemporal parameter changes and first order autocorrelation with respect to income. Furthermore, the power of the insignificant F-statistic on parameter constancy in class is strongly impaired by the high level of heteroscedasticity in GI-classes and time¹. Heuristic examination of the residual structure indicated that

¹This is the well-known problem of testing homoscedasticity and parameter constancy simultaneously; the use of either F-statistic (FS, FH) involves the implicit assumption that the non-tested property of the regression holds. If it does not, the F-statistics will be biased. See Maddala (18) p. 199.

Table 1 : Estimates with Y (Excl. Tax Surcharge)

No.	Estim. Procedure	Sample	Const.	Y	P	YL	Time	adR ²	SSR	SE	DW _Y	FH _{CL}	FH _{T1}	FS _{CL}	FS _{T1}	FS _{T2}
I	OLSQ	n = 65 CL: 2-14 T: 61-74	-9,127	1,216 (0,060)	-1,903 (0,418)	-	-	0,991	4,122	0,258	2,79**	15,69**	4,42**	2,32	10,49**	5,54**
II	OLSQ	n = 40 CL: 7-14 T: 61-74	-9,176	1,230 (0,024)	-1,729 (0,169)	-	-	0,998	0,357	0,098	1,79	1,65	4,12**	1,85	9,52**	3,55**
III	OLSQ	n = 40 CL: 7-14 T: 61-74	-9,426	1,249 (0,020)	-1,622 (0,140)	-	0,013 (0,003)	0,998	0,231	0,080	1,73	3,32**	4,75**	1,24	1,83	1,71
IV	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,628	1,248 (0,021)	-1,622 (0,143)	0,236 (0,058)	-	0,998	0,243	0,082	1,77	3,24**	4,79**	0,96	2,23	1,91
V	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,481	1,274 (0,018)	-1,378 (0,128)	0,308 (0,044)	-	-	0,215	0,077	1,78	1,09	2,16	1,45	4,75**	2,35*
VI	OLSQ	n = 24 CL: 7-14 T: 68-74	-8,904	1,213 (0,029)	-1,825 (0,198)	-0,009 ⁰ (0,146)	-	0,998	0,169	0,092	1,34**	-	-	-	-	1,53
VII	WLSQ	n = 24 CL: 7-14 T: 68-74	-9,386	1,224 (0,024)	-1,682 (0,172)	0,036 ⁰ (0,107)	-	-	0,106	0,073	1,11**	-	-	-	-	1,11
VIII	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,877	1,254 (0,020)	-1,544 (0,158)	0,359 (0,069)	-	-	1,810	0,172	2,50**	1,66	1,79	12,67**	3,98**	3,25**
IX	WLSQ	n = 39 CL: 2-14 T: 68-74	-11,364	1,235 (0,018)	-1,535 (0,140)	0,231 (0,106)	-	-	0,665	0,138	1,26**	-	-	-	-	3,80**

No.	Estim. Procedure	Sample	Const.	Y	Y _L	Y _H	P _L	P _H	YL	adR ²	SSR	SE	DW _Y
X	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,927	1,262 (0,021)	-	-	-1,777 (0,160)	-1,634 (0,138)	0,247 (0,056)	0,998	0,220	0,079	2,15
XI	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,624	1,278 (0,017)	-	-	-1,617 (0,171)	-1,491 (0,135)	0,309 (0,042)	-	0,192	0,074	2,26
XII	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,754	-	1,244 (0,039)	1,271 (0,026)	-1,855 (0,209)	-1,262 (0,656)	0,246 (0,056)	0,998	0,218	0,080	2,17
XIII	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,489	-	1,256 (0,024)	1,292 (0,020)	-1,756 (0,198)	-1,023 (0,376)	0,312 (0,041)	-	0,183	0,073	2,31
XIV	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,801	1,255 (0,020)	-	-	-0,774 (0,453)	-1,422 (0,169)	0,360 (0,067)	-	1,716	0,169	2,75**
XV	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,806	-	1,260 (0,028)	1,255 (0,021)	-0,618 (0,762)	-1,441 (0,185)	0,359 (0,068)	-	1,714	0,170	2,76**

(Abbreviations, see appendix)

taxpayers with nominal gross income below 16 000 DM (gross income classes 2 to 6) should be omitted to improve the homogeneity of the sample. This restriction does not seriously narrow the policy scope of the predictions derived from the regression results since only 3,49 % of total private giving in 1974 stemmed from these lower classes.

Equation II shows the results for the restricted sample: while probably homogeneous in class, the estimate is still plagued by heteroscedasticity and parameter changes in time.

Intertemporal parameter constancy can easily be established by introducing an exponential time trend as is done in equation III. Although quite satisfactory on statistical grounds, III suffers from a theoretical drawback: the time trend cannot simply be interpreted as the net effect of all non-specified variables moving in trend since the use of grouped data with nominal gross income classes unchanged over time mostly eliminates any intertemporal increase of the income level itself. In the extreme, each individual taxpayer may have experienced dramatic increases in income while the average income of each class remains virtually constant as the intra- and intergroup movement of the taxpayers leaves the distribution in each class unchanged.

To account for this specific effect a variable for the income level has to be introduced. Unfortunately, the average disposable income of all sample tax returns will not do the job since its trend itself is biased downward due to the disproportionally growing number of low income earners moving from the excluded gross income classes (below 16 000 DM) into the included ones and, even more importantly, from wage taxation - not included in the statistics - into income taxation¹. Instead national income per employee (in

¹During the sample period, income taxation has been compulsory for wage incomes above 24 000 DM for singles, 48 000 DM for couples itemizing one single tax return. As these limits fall into the first two sample classes whose share in the total number of income tax returns has increased from 24,28 % in 1961 to 67,33 % in 1974, the quantitative importance of the downward bias should be obvious.

constant 1970 DM) appears to be a more reliable proxy for the overall level of income (YL) at any given point in time.

As can be seen from the sum of squared residuals of equation IV YL explains the intertemporal shifts almost as well as the time trend does¹; the insignificant F-statistic on intertemporal parameter constancy suggests that there is no further need for resorting to a "theoretically empty" time trend.

Equation IV will serve as a starting-point for further analysis. It yields income and price elasticities in absolute amount significantly greater than one thus indicating broad scope for a liberalized tax treatment of charitable contributions. Due to some heteroscedasticity in time and class, equation IV is not yet the most efficient of all linear unbiased estimates. To reduce the variance to a global minimum an iterative weighted least squares procedure (WLSQ) was adopted. In a first step the absolute values of the OLSQ-residuals of IV were regressed on all exogeneous variables to identify the causes of the heteroscedasticity². Drawing on the estimated coefficients of this auxiliary regression fitted residuals were computed and normalized; the reciprocals of these fitted (and normalized) residuals were used as weights to the original data. On basis of the weighted data a new regression was run, and the whole procedure was repeated until no further increase in efficiency could be achieved. In fact, two iterations were sufficient to eliminate all traces of heteroscedasticity.

Equation V presents the result of the WLSQ-procedure: while the efficiency gain is remarkable - the sum of squared residuals is

¹On purely statistical grounds, of course, any other variable with a pronounced trend component would do the job as well. On theoretical grounds, however, no other variable has a comparable degree of a priori plausibility.

²This procedure is known as the Glejser-test for heteroscedasticity. See Maddala (18), p. 262; Glejser (14).

reduced from 0.245 to 0.215 -, the test statistics identify an intertemporal parameter change, particularly pronounced between the periods 1961-65 and 1968-74. To check on the magnitude of this parameter change which may be present but undetected due to heteroscedasticity in III and IV as well, the equations were reestimated for the homogeneous period beginning in 1968. These estimates (equations VI and VII) yield higher absolute price elasticities thus casting some doubt on the accuracy of the relatively low absolute price parameter of the WLSQ-equation¹.

To obtain some more reliable information on the magnitude of the coefficients the restrictive assumption of constant elasticities over the income range has to be relaxed. Unfortunately, the high collinearity between Y and P and the moderate sample size do not allow any unconstrained parameter estimation for any distinct gross income or price range. Similarly, the common procedure of specifying the variability of the elasticities by hypothesizing elasticity changes somehow functionally related to the level of income and price is not applicable as, again, the high collinearity between Y and P at a moderate sample size prohibits the introduction of any further collinear variable². Instead, we must resort to the less elegant procedure of defining distinct price and income variables for separate gross income ranges, namely Y_L and P_L for GI-classes of 16 000 - 100 000 DM and Y_H and P_H for GI-classes above 100 000 DM.

Equations X and XI, allowing for varying price elasticities at a constant income elasticity, yield useful insights: the absolute price elasticity turns out to be slightly (but not significantly)

¹Estimates of the earlier period yield a correspondingly lower absolute price elasticity (around 1,30); as these estimates are based on a very small sample (16 observations), their value should not be rated high.

²With the somewhat richer U.S. data, Feldstein (9, pp. 88 f.) is able to specify a model along these lines; the variance of his parameter estimates, however, is also pushed up by the high collinearity.

higher in the lower than in the upper gross income ranges. If we further relax the assumption of a constant income elasticity as is done in XII and XIII, the gap widens, but the parameter estimates lose a good deal of their statistical accuracy due to the "separate" collinearity within both ranges.

The results are in line with common prejudice asserting that high income earners are less receptive to price incentives since their charitable giving is primarily motivated by a price inelastic desire for social power and prestige. As the parameter shifts are hardly secured on statistical grounds, however, no far reaching conclusions can be drawn without additional evidence from some richer data source.

Incidentally, the slight parameter change may well explain the relatively low absolute price elasticity indicated by the WLSQ-equation V: as the estimation error in IV declines with the level of income, the weighting procedure attaches greater weight to the observations of the high income classes thus pulling down the overall price elasticity toward some lower absolute level. The specifications with variable elasticities (X - XIII) clearly point to a higher absolute price elasticity of the middle income classes somewhere between 1,60 and 1,80. This should be kept in mind when resorting to the estimates to make predictions of the quantitative effects of various reform proposals¹.

Finally, the WLSQ procedure was applied to the sample of all thirteen income classes. The results in VIII - for the full sample - and IX - for 1968-1974 - show parameters not much different from previous estimations using the restricted sample. As the test statistics indicate distinct parameter changes in class and time, the estimates should not be taken too seriously. The specifications with variable elasticities (XIV, XV) between the gross income classes 1 500 - 16 000 DM and above 16 000 DM indi-

¹We will return to this issue in Section 5.

cate marked parameter changes at fairly large estimation errors; no reliable conclusions can be drawn from these results.

The whole set of regressions in table 1 was reestimated for gross disposable income and price variables including the impact of the tax surcharge introduced in 1968¹.

The main results are presented in table 2. As could be expected the parameter estimates and the test statistics barely deviate from previous results of corresponding specifications in table 1. The only remarkable differences appear to be the slightly lower absolute price elasticities and the slightly lower estimation errors in almost all specifications: both facts are easily explained by the increased price variation due to higher marginal tax rates in the upper income classes.

On theoretical grounds the results of table 1 are somewhat inferior to the results of table 2 as those are computed on a more complete basis of all factors relevant to the economic calculus of individual taxpayers.

4.2. Estimates with "taxable income" (YT)

An alternative set of specifications using taxable income YT instead of gross income Y yield the results presented in table 3 (excluding the tax surcharge effects) and table 4 (including the tax surcharge effects).

In general, the estimates have slightly inferior statistical qualities compared to the estimates with the gross income variable. While the income elasticities hardly change, the absolute price elasticities are markedly reduced to levels around 1,3;

¹See pp. 12 ff. of this paper for the discussion of this specification problem.

Table 2 : Estimates with Y (Incl. Tax Surcharge)

No.	Estim. Procedure	Sample	Const.	Y	P	YL	Time	adR ²	SSR	SE	DW _Y	FH _{CL}	FH _{T1}	FS _{CL}	FS _{T1}	FS _{T2}
I	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,295	1,249 (0,020)	-1,589 (0,133)	0,201 (0,058)	-	0,998	0,232	0,080	1,76	3,22*	4,73**	0,97	1,87	1,75
II	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,130	1,266 (0,019)	-1,413 (0,123)	0,278 (0,044)	-	-	0,208	0,076	1,74	1,13	1,96	1,45	3,48*	2,09
III	OLSQ	n = 24 CL: 7-14 T: 68-74	-8,976	1,217 (0,029)	-1,747 (0,184)	-0,003 ⁰ (0,145)	-	0,998	0,166	0,091	1,36 ⁺⁺	-	-	-	-	1,49
IV	WLSQ	n = 24 CL: 7-14 T: 68-74	-9,529	1,228 (0,026)	-1,599 (0,164)	0,049 (0,102)	-	-	0,114	0,075	1,08 ⁺⁺	-	-	-	-	1,39
V	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,748	1,257 (0,021)	-1,482 (0,150)	0,345 (0,075)	-	-	1,850	0,174	2,52 ⁺⁺	1,69	1,73	13,24 ^{**}	4,04 ^{**}	3,33 ^{**}
VI	WLSQ	n = 39 CL: 2-14 T: 61-74	-11,536	1,239 (0,018)	-1,469 (0,131)	0,246 (0,107)	-	-	0,691	0,140	1,28 ⁺⁺	-	-	-	-	3,82 ^{**}

No.	Estim. Procedure	Sample	Const.	Y	Y _L	Y _H	P _L	P _H	YL	adR ²	SSR	SE	DW _Y
VII	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,575	1,263 (0,021)	-	-	-1,734 (0,149)	-1,597 (0,129)	0,211 (0,056)	0,999	0,209	0,077	2,15
VIII	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,216	1,270 (0,018)	-	-	-1,643 (0,156)	-1,520 (0,126)	0,273 (0,041)	-	0,182	0,072	2,24
IX	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,511	-	1,248 (0,034)	1,269 (0,024)	-1,795 (0,185)	-1,314 (0,521)	0,218 (0,058)	0,999	0,207	0,078	2,14
X	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,272	-	1,259 (0,022)	1,280 (0,020)	-1,719 (0,177)	-1,254 (0,318)	0,287 (0,044)	-	0,178	0,072	2,29
XI	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,716	1,258 (0,020)	-	-	-0,740 (0,447)	-1,370 (0,161)	0,350 (0,735)	-	1,759	0,171	2,75 ^{**}
XII	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,715	-	1,261 (0,028)	1,258 (0,021)	-0,631 (0,754)	-1,382 (0,175)	0,349 (0,074)	-	1,758	0,173	2,76 ^{**}

(Abbreviations, see appendix)

Table 3 : Estimates with YT (Excl. Tax Surcharge)

No.	Estim. Procedure	Sample	Const.	YT	P	YL	Time	adR ²	SSR	SE	DW _Y	FH _{CL}	FH _{T1}	FS _{CL}	FS _{T1}	FS _{T2}
I	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,138	1,242 (0,023)	-1,288 (0,165)	0,239 (0,064)	-	0,988	0,301	0,091	1,78	3,24*	5,96**	0,36	2,61	1,87
II	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,315	1,272 (0,020)	-1,031 (0,144)	0,340 (0,047)	-	-	0,263	0,085	1,87	1,21	1,62	0,87	6,18**	2,85
III	OLSQ	n = 24 CL: 7-14 T: 68-74	-7,734	1,204 (0,032)	-1,502 (0,227)	-0,071 (0,161)	-	0,997	0,206	0,102	1,37 ⁺⁺	-	-	-	-	1,26
IV	WLSQ	n = 24 CL: 7-14 T: 68-74	-7,776	1,210 (0,028)	-1,405 (0,194)	-0,069 ^o (0,116)	-	-	0,111	0,075	1,29 ⁺⁺	-	-	-	-	1,11
V	WLSQ	n = 65 CL: 2-14 T: 61-74	-12,860	1,250 (0,024)	-0,819 (0,210)	0,308 (0,070)	-	-	3,487	0,239	1,53 ⁺⁺	1,40	1,07	29,26**	6,32**	3,47
VI	WLSQ	n = 39 CL: 2-14 T: 68-74	-8,486	-1,214 (0,026)	-0,783 (0,229)	0,043 ^o (0,133)	-	-	1,522	0,209	0,60**	-	-	-	-	1,40

No.	Estim. Procedure	Sample	Const.	YT	YT _L	YT _H	P _L	P _H	YL	adR ²	SSR	SE	DW _Y
VII	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,337	1,251 (0,024)	-	-	-1,394 (0,188)	-1,296 (0,165)	0,247 (0,064)	0,998	0,290	0,091	1,92
VIII	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,415	1,275 (0,020)	-	-	-1,217 (0,187)	-1,120 (0,153)	0,340 (0,046)	-	0,246	0,084	2,11
IX	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,174	-	1,233 (0,046)	1,259 (0,030)	-1,473 (0,258)	-0,963 (0,755)	0,245 (0,065)	0,998	0,288	0,092	1,94
X	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,329	-	1,257 (0,025)	1,289 (0,024)	-1,343 (0,217)	-0,708 (0,398)	0,344 (0,046)	-	0,237	0,084	2,16
XI	WLSQ	n = 65 CL: 2-14 T: 61-74	-11,519	1,250 (0,024)	-	-	-0,217 (0,722)	-0,728 (0,235)	0,308 (0,070)	-	3,444	0,240	1,56 ⁺
XII	WLSQ	n = 65 CL: 2-14 T: 61-74	-11,818	-	1,395 (0,038)	1,253 (0,021)	4,504 (1,228)	-1,075 (0,219)	0,310 (0,061)	-	2,570	0,209	2,45 ⁺

(Abbreviations, see appendix)

Table 4 : Estimates with YT (Incl. Tax Surcharge)

No.	Estim. Procedure	Sample	Const.	YT	P	YL	Time	adR ²	SSR	SE	DW _Y	FH _{CL}	FH _{T1}	FS _{CL}	FS _{T1}	FS _{T2}
I	OLSQ	n = 40 CL: 7-14 T: 61-74	-10,988	1,243 (0,023)	-1,275 (0,155)	0,223 (0,065)	-	0,998	0,294	0,090	1,77	3,22	5,93**	0,46	2,41	1,80
II	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,114	1,265 (0,021)	-1,098 (0,140)	0,324 (0,050)	-	-	0,265	0,086	1,84	1,30	1,81	0,83	5,59**	2,62
III	OLSQ	n = 24 CL: 7-14 T: 68-74	-7,783	1,207 (0,032)	-1,448 (0,211)	-0,069 ⁰ (0,160)	-	0,997	0,205	0,101	1,33 ⁺⁺	-	-	-	-	1,27
IV	WLSQ	n = 24 CL: 7-14 T: 68-74	-7,766	1,215 (0,028)	-1,355 (0,182)	-0,073 ⁰ (0,117)	-	-	0,117	0,077	1,18 ⁺⁺	-	-	-	-	1,13
V	WLSQ	n = 65 CL: 2-14 T: 61-74	-11,424	1,245 (0,023)	-0,880 (0,198)	0,295 (0,075)	-	-	3,607	0,234	1,56 ⁺	1,47	1,11	28,48**	6,20**	3,52
VI	WLSQ	n = 39 CL: 2-14 T: 68-74	-8,314	1,219 (0,024)	-0,777 (0,208)	0,021 (0,122)	-	-	1,603	0,214	0,57**	-	-	-	-	1,52

No.	Estim. Procedure	Sample	Const.	YT	YT _L	YT _H	P _L	P _H	YL	adR ²	SSR	SE	DW _Y
VII	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,176	1,252 (0,024)	-	-	-1,374 (0,177)	-1,280 (0,155)	0,229 (0,065)	0,998	0,283	0,090	1,95
VIII	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,200	1,269 (0,020)	-	-	-1,278 (0,172)	-1,176 (0,144)	0,321 (0,048)	-	0,245	0,084	2,16
IX	OLSQ	n = 40 CL: 7-14 T: 61-74	-11,120	-	1,240 (0,041)	1,257 (0,028)	-1,428 (0,229)	-1,060 (0,605)	0,234 (0,067)	0,998	0,282	0,091	1,96
X	WLSQ	n = 40 CL: 7-14 T: 61-74	-12,231	-	1,261 (0,025)	1,276 (0,024)	-1,332 (0,200)	-0,985 (0,374)	0,331 (0,052)	-	0,242	0,084	2,20
XI	WLSQ	n = 65 CL: 2-14 T: 61-74	-11,411	1,245 (0,023)	-	-	-0,273 (0,723)	-0,792 (0,223)	0,299 (0,076)	-	3,562	0,244	1,59 ⁺
XII	WLSQ	n = 65 CL: 2-14 T: 61-74	-11,523	-	1,391 (0,039)	1,249 (0,020)	4,488 (1,248)	-1,115 (0,208)	0,282 (0,066)	-	2,676	0,213	2,46 ⁺

(Abbreviations, see appendix)

in the WLSQ-equation II it is even pushed down to a level around 1,1. The variable elasticity specifications reveal the same pattern as in tables 1 and 2, with the absolute price elasticity being somewhat lower in the high income ranges. The differences between the corresponding equations of tables 3 and 4 are of a minor magnitude.

The results show quite clearly that a change in the definition of income may have substantial effects on the estimated parameters. Hence a priori arguments favouring the broad or the narrow concept of income cannot be neglected when making policy recommendations.

4.3. Comparison with Feldstein's Estimates

Table 5 contrasts the results with the main constant elasticity estimates obtained by M. Feldstein in a time-series-cross-section analysis of U.S. income tax data which methodologically comes very close to the present study. The table reveals some striking features which will be sketched out briefly:

- The specification with gross disposable income indicates higher absolute income and price elasticities for the case of Germany. There is a plausible explanation for these peculiar differences: About 65 % of all charitable giving in the U.S. is destined for religious organizations; the corresponding ratio for the F.R.G. is most probably far lower¹ because, on behalf of the churches, the government collects a so-called "church tax" from church members. As Feldstein has shown for the U.S.², lower income earners concentrate their giving almost exclusively on religious organizations, whereas high income earners prefer giving to other charitable purposes like higher education, research, health services etc.; thus religious giving figures as a kind of income- and price inelastic base which is obviously present in the U.S.³, but lacking in the

¹Unfortunately, no disaggregated data on this issue is published in Germany.

²See Feldstein (10), p. 213 (table 1).

³Feldstein's elasticity estimates for various kinds of charitable giving point in this direction (10, p. 217, table 3).

Table 5 : Comparison Between USA and FRG

		estimation procedure	specification	estimated coefficients of log-linear model (standard error in parenthesis)						no. of cases	SE
				const.	Y	YT	P	Time	YL		
USA (Feldstein (8))	1)	OLSQ	Y,without Time	-1,922	0,822 (0,032)	-	-1,238 (0,101)	-	-	117	0,125
	2)	OLSQ	Y,with Time	-1,649	0,806 (0,023)	-	-1,272 (0,071)	-0,014 (0,001)	-	117	0,088
	3)	OLSQ	YT,without Time	1,690	-	0,445 (0,031)	-2,044 (0,128)	-	-	117	0,195
FRG	4)	OLSQ	Y,with YL	-11,295	1,249 (0,020)	-	-1,589 (0,133)	-	0,201 (0,058)	40	0,080
	5)	WLSQ	Y,with YL	-12,130	1,266 (0,019)	-	-1,413 (0,123)	-	0,278 (0,044)	40	0,076
	6)	OLSQ	YT,with YL	-10,988	-	1,243 (0,023)	-1,275 (0,155)	-	0,223 (0,065)	40	0,090
	7)	WLSQ	YT,with YL	-12,114	-	1,265 (0,021)	-1,098 (0,140)	-	0,324 (0,050)	40	0,086

(Abbreviations, see appendix)

F.R.G. The validity of this explanation seems to be strengthened by the fact that the ratio of average German to average American charitable giving at equal income levels rises from 1/27th for taxpayers with net income of about 18 000 DM (1968) to 1/7th for income levels about 200 000 DM (1968). Hence it is not surprising that the German regression curve turns out to be somewhat steeper than the American one.

- In both studies taxable income has a lower explanatory power than gross disposable income. In the case of the U.S., the results for taxable income cast serious doubt on the validity of the specification: the extraordinary low income elasticity, the extremely high absolute price elasticity and, most of all, the high standard error of the regression are apparently no good basis for any comparison with the results for Germany.
- Feldstein's estimates indicate a negative time trend which - he argues - may be due to a decline of the relative income of the taxpayers in the restricted sample¹. To me, the negative sign remains an unexplained puzzle since precisely the grouping and averaging of the data should tend to "neutralize" any absolute change in disposable income. If at all, a positive time trend should emerge².
- Finally, Feldstein's estimates yield a constant term clearly above the one estimated for Germany. This fact can mostly be explained by differing average propensities to spend on charity independent of income and price: in the U.S., the ratio of contributions to disposable income varies between 25,9 % (!) in the highest GI-class down to 2,8 % in some middle income ranges³ whereas in Germany it never surpasses 1,1 %. Due to some non-specified socioeconomic or political reasons, the Americans are far more generous than the Germans.

¹Feldstein (9), p. 88, footnote 27.

²See the argument outlined in part 4.1. of this paper. Abrams & Schmitz (1) believe that an increase in public welfare expenditure has caused this downward trend in private giving.

³Feldstein (9), p. 87, table 1.

5. Proposals for Reform

Almost all price elasticities estimated in Section IV indicate broad scope for efficiency gains through a more liberal income tax treatment of charitable giving in the Federal Republic of Germany.

To forecast the quantitative effects of various reform schemes we must take one of the specifications in table 2 and 4 as the basis for predictions. Although the WLSQ-equation II may have the most attractive statistical properties, it will not be chosen as it probably underestimates the price elasticity in the important middle income ranges (16 000 DM - 100 000 DM) which, in 1974, included 96,28 % of all tax returns in the sample. On these grounds the simple OLSQ-equation I is clearly preferable; as its restrictive constant elasticity assumption is not falsified by the homogenous sample estimates of equations III and IV or the variable elasticity specifications of equations VII to X, there is no reason to be particularly sceptical about the accuracy of the estimate.

On the basis of equations I in table 2 and 4, ex-post predictions for 1974 are made by retaining the 1974 observations of YL and Y resp. YT but replacing the factual values of P by the designed reform prices.

Two basic ways of subsidizing charity must be considered, namely the tax deduction and the tax credit.

- In a system of tax deductions, the taxpayer is allowed to reduce his taxable income by the amount of his charitable giving. Thus his per unit tax saving is a positive function of the marginal tax rate he faces. Hence, in a progressive income tax scheme, the subsidy per unit of giving rises with income.

- In a system of flat-rate tax credits, the taxpayer is allowed to reduce his tax liability by a fixed percentage of his charitable giving. Hence his tax saving is independent of the income tax scheme provided that his tax liability is not yet close to zero which is the unusual limiting case¹.

As the present German system is a pure deduction scheme with the price of private monetary transfers just equaling one minus the marginal tax rate, there are two distinct changes any reform may bring about, namely

- a replacement of the tax deduction by a tax credit yielding the same amount of gross charitable giving, and
- a genuine liberalization by increasing subsidies to charitable giving either in a tax deduction or in a tax credit framework.

Both aspects are analyzed in tables 6 and 7:

- Columns 1 and 2 put the present deduction system against a tax credit scheme yielding an equal amount of gross giving (about 660 Mio DM in current 1974 prices) by fixing the per unit tax subsidy at 0.3784 (in table 6) and 0.3683 (in table 7). The structural differences deserve some comments: only the lowest two income classes enjoy a higher subsidy rate in the tax credit system but as they alone account for 82,38 % of all tax returns in the sample the quantitative impact of the subsidy shift is tremendous. As can be seen from the lower bounds of the prediction intervalls, the increase of private giving in the lower income ranges is well secured on statistical grounds, with the possible exception of the first GI-class in the elasticity-pessimistic prediction of table 7. The social gain as defined in Section 2² of the current tax deduction system is slightly

¹ A third way of subsidizing charity is the flat-rate matching grant: in this system a fixed proportion of the taxpayer's charitable giving is added to the donation. As long as an increase in the recipient's welfare is the prevalent charity motive, the economic effects of the matching grant are analogous to the effects of a flat-rate tax credit.

² See pp. 6 f.

Table 6 : Predictions Based on Equation I in Table 2

	CL (1000 DM)	factual values	(2) $m = 0.3784$ $P = 0.6216$	(3) $p = \frac{m}{(\bar{p} - (1-\bar{p}) \cdot 0.5)}$ $\bar{m} = 1.5 \bar{m}$	(4) $m = 0.6649$ $p = 0.3351$	(5) $m = 0.8$ $p = 0.2$
c_1	16 25 50 75 100 250 500 1000	30.56 51.06 133.84 243.29 452.13 1232.80 2656.19 13263.17	34.76 < 40.20 < 46.49 63.04 < 72.65 < 83.72 108.90 < 125.30 < 144.17 160.42 < 184.55 < 212.30 277.25 < 319.30 < 367.73 656.69 < 760.00 < 879.57 1457.34 < 1699.64 < 1982.24 6422.67 < 7649.73 < 9111.23	28.00 < 32.29 < 37.24 73.37 < 84.88 < 98.20 206.34 < 244.53 < 289.78 405.46 < 490.80 < 594.11 1122.34 < 1420.30 < 1797.35 4099.91 < 5387.65 < 7079.83 9315.65 < 12048.72 < 15583.61 43073.76 < 54228.72 < 66272.54	86.11 < 107.27 < 133.64 157.43 < 193.87 < 238.75 274.28 < 334.39 < 407.66 406.72 < 492.49 < 596.36 710.04 < 852.10 < 1022.59 1711.24 < 2028.20 < 2403.85 3862.65 < 4535.78 < 5326.21 17561.40 < 20414.60 < 23731.30	177.37 < 243.54 < 334.40 324.85 < 440.15 < 596.36 507.05 < 759.17 < 1016.37 842.17 < 1118.12 < 1454.49 1474.05 < 1934.53 < 2533.54 3570.64 < 4604.67 < 5933.15 8108.56 < 10297.70 < 13077.60 37437.61 < 46347.82 < 57378.50
$\sum c_1$	16 25 50 75 100 250 500 1000	46 297 667 221 544 540 107 057 679 45 586 220 104 163 744 46 884 617 27 082 513 61 846 162 660 463 142	60 902 035 315 221 521 100 226 593 34 579 872 67 582 719 28 903 560 17 329 529 35 670 691 660 416 520	48 923 125 368 276 017 195 594 952 91 963 765 300 618 331 204 897 656 122 848 794 252 868 518 1 585 991 156	162 511 476 841 183 706 267 476 220 92 279 821 180 354 634 77 134 474 46 246 813 95 193 280 1 762 380 424	368 959 222 1 909 776 216 607 252 944 209 506 755 409 465 803 175 120 315 104 595 564 216 119 862 4 001 196 481
$\sum c_1(1-p_1)$	16 25 50 75 100 250 500 1000	8 844 489 64 453 792 42 247 171 20 184 790 52 571 873 25 593 506 14 783 879 33 760 757 262 440 257	23 045 330 119 279 824 37 925 743 13 085 023 25 573 301 10 937 107 6 557 494 13 497 789 249 901 611	14 016 475 160 697 240 115 772 652 61 082 333 227 583 108 167 780 446 100 594 735 207 061 386 1 054 588 375	108 053 880 559 303 046 177 844 939 61 356 853 119 917 796 51 286 712 30 749 506 63 294 012 1 171 806 744	295 167 378 1 527 820 973 485 802 355 167 605 404 327 572 643 140 096 252 83 996 291 172 895 889 3 200 957 185
$\sum c_1 p_1$	16 25 50 75 100 250 500 1000	37 453 178 157 090 749 64 810 508 51 591 871 21 291 110 12 298 635 28 085 405 398 022 885	37 856 705 195 941 698 62 300 850 21 494 849 42 009 418 17 966 453 10 772 035 22 172 902 410 514 909	34 906 650 207 578 777 79 822 300 30 881 432 73 035 224 37 117 210 22 254 059 45 807 132 531 402 784	54 457 596 281 880 660 89 631 281 30 922 968 60 436 838 25 847 762 15 497 307 31 899 268 590 573 680	73 751 844 381 955 243 121 450 589 41 501 351 81 893 161 35 024 063 20 599 073 43 223 972 800 239 296
$\sum \sum c_1 p_1$						

(Abbreviations, see appendix)

Table 7 : Predictions Based on Equation I in Table 4

	CL (1000 DM)	(1) factual values	(2) $m = 0.3683$ $p = 0.6317$	(3) $m = 1.5 \bar{m}$ $p = (\bar{p} - (1-\bar{p}) * 0.5)$	(4) $m = 0.6482$ $p = 0.3518$	(5) $m = 0.8$ $p = 0.2$
C_1	16 25 50 75 100 250 500 1000	30.56 51.06 133.84 243.29 492.13 1232.80 2656.19 13263.17	28.67 < 33.78 < 39.80 60.87 < 71.39 < 83.72 110.65 < 129.58 < 151.75 163.05 < 190.99 < 223.70 287.33 < 337.20 < 395.72 697.00 < 823.48 < 972.91 1548.89 < 1847.60 < 2203.92 6769.37 < 8278.28 < 10123.59	24.63 < 28.92 < 33.97 70.04 < 82.56 < 97.30 186.55 < 226.16 < 274.18 343.64 < 427.29 < 531.31 869.97 < 1139.79 < 1493.30 2954.31 < 4045.52 < 5539.77 6751.01 < 9076.71 < 12203.60 31205.40 < 40668.80 < 53002.10	55.70 < 71.22 < 91.07 119.68 < 150.53 < 189.33 219.91 < 273.24 < 339.50 326.56 < 402.72 < 496.65 582.46 < 711.04 < 868.00 1442.14 < 1736.44 < 2090.79 3267.04 < 3895.95 < 4645.92 14775.40 < 17456.10 < 20623.10	101.01 < 146.29 < 211.68 217.62 < 309.19 < 439.28 400.98 < 561.23 < 785.53 596.67 < 827.19 < 1146.76 1068.02 < 1460.47 < 1997.13 2662.80 < 3566.63 < 4777.26 6081.13 < 8002.27 < 10530.30 28063.70 < 35854.70 < 45808.60
$\sum C_1$	16 25 50 75 100 250 500 1000	46 297 667 221 544 540 107 057 679 45 586 220 104 163 744 46 884 617 27 082 513 61 846 162	51 175 889 309 754 499 103 650 135 35 786 560 71 371 415 31 317 768 18 838 130 38 601 620	43 813 106 358 220 079 180 903 801 80 063 036 241 246 812 153 855 171 92 546 135 189 638 614	107 896 591 653 135 520 218 562 763 75 459 257 150 498 015 66 038 550 39 723 106 81 397 794	221 625 839 1 341 546 346 448 923 948 154 993 899 309 121 620 135 642 506 81 591 145 167 190 466
$\sum \sum C_1$	\sum	660 463 142	660 496 016	1 340 286 754	1 392 711 596	2 860 635 769
$\sum C_1(1-p_1)$	16 25 50 75 100 250 500 1000	8 844 489 64 453 792 42 247 171 20 184 790 52 571 873 25 593 506 14 783 879 33 760 757	18 848 080 114 082 582 38 174 345 13 180 190 26 286 092 11 534 334 6 938 083 14 216 977	12 552 455 156 309 332 107 076 960 53 177 869 182 635 899 125 984 307 75 781 403 155 285 579	69 938 570 423 362 444 141 672 383 48 912 690 97 552 813 42 806 188 25 748 517 52 762 050	177 300 671 1 073 237 077 359 139 159 123 995 119 247 297 296 108 514 004 65 272 916 133 752 373
$\sum \sum C_1(1-p_1)$	\sum	262 440 257	243 260 683	868 803 804	902 755 657	2 288 508 615
$\sum C_1 p_1$	16 25 50 75 100 250 500 1000	37 453 178 157 090 749 64 810 508 25 401 430 51 591 871 21 291 110 12 298 635 28 085 405	32 327 809 195 671 917 65 475 790 22 606 370 45 085 323 19 783 434 11 900 047 24 384 643	31 260 651 201 910 748 73 826 841 26 885 167 58 610 913 27 870 864 16 764 752 34 353 035	37 458 021 229 773 076 76 890 380 26 546 567 52 945 202 23 232 362 13 974 589 28 635 744	44 325 168 268 309 269 89 784 789 30 998 780 61 824 324 27 128 502 16 318 229 33 438 093
$\sum \sum C_1 p_1$	\sum	398 022 885	417 235 333	471 482 950	489 955 940	572 127 154

(Abbreviations, see appendix)

lower than the social gain of the equal revenue tax credit system which indicates some shift from intramarginal to marginal subsidization.

- Columns 3 and 4 put the quantitative effects of a 50 %-increase of subsidy rates in the present deduction system¹ against the effects of a tax credit with the same average per unit subsidy of 0.6649 for all taxpayers. Both reform schemes induce remarkable increases in gross giving and social gain, but once again, the tax credit wins the race on quantitative efficiency grounds, independently of the prediction equation used. Again, the statistical properties of the forecasts are quite satisfactory. It should be kept in mind, however, that the absolute price elasticity estimate for the upper classes may well entail an upward bias; as the tax deduction scheme relies more heavily on the quantitative increase of private giving in these classes, the efficiency gap between the two schemes may even be larger than indicated.
- Column 5 shows the forecast for a generous reform introducing a flat-rate per unit tax credit of 0.8. The wide gap between the "optimistic" predictions of table 6 and the "pessimistic" predictions of table 7 is particularly striking for this dramatic subsidy increase. In both cases, however, the induced increases in gross giving and social gain are remarkable. Although the forecast may be biased due to neglected income effects occurring through the drastic change in the price of charity, the overall magnitude of the predicted level of private giving is certainly no statistical illusion. Before dismissing such generous proposals for reform as utterly unrealistic, we should recognize that the ratio of charitable giving to disposable income - in this reform scheme in the range of 1,33 % to 3,78 % for the elasticity optimistic predictions of table 6 - would merely be approaching American dimensions from below.

¹Strictly speaking, the new scheme is not a deduction system anymore since the marginal tax rate does no more equal the per unit subsidy rate. To avoid semantic confusion, we retain the previous terminology throughout the paper.

In summary we can conclude that there is in fact a very broad scope for liberalizing the tax treatment of charitable contributions. On purely quantitative efficiency grounds, this scope could best be exploited if the present tax deduction scheme were replaced by a flat-rate-tax-credit which allowed the state to tap the broad giving potential of the middle classes¹.

6. Final Remarks

The econometric model developed in this paper shows quite clearly what kind of information can be drawn from German income tax statistics. The estimates of income and price elasticities are fairly reliable on statistical grounds and the policy conclusions derived from these estimates are firmly rooted in standard microeconomic theory.

Nevertheless the limitations of an analysis based on a single set of data should not be overlooked: no doubt, it would be desirable to check on the magnitude of the coefficients by using some entirely independent data sources as has been done for the U.S. by Feldstein & associates (3, 11, 12) and Clotfelter (7).

Unfortunately, this way of corroborating the results does not seem to be feasible for Germany since there has never been a "national survey of philanthropy". The regionally disaggregated tax data for the German states may be a precious source for estimating the impact of other variables on charitable giving; they are, however, of little help for checking on the parameter estimates in this paper.

¹This is not to say that other externality arguments may not point in different directions. In my view, however, a thorough welfare theoretic analysis will support the superiority of the tax credit system (see Hochman & Rodgers (17, pp. 7 ff.), Paqué (19, pp. 22 ff.)).

Appendix

Abbreviations in tables 1 - 5:

OLSQ	= ordinary least squares;
WLSQ	= weighted least squares (weighting procedure described in section 4);
n	= total number of observations in the sample;
Cl.	= GI-classes in the sample;
T	= years in the sample;
const.	= parameter estimate of constant resp. weighted constant in log-linear specifications;
$Y, YT, P, Y_L, Y_H, Y_{LH}, Y_{TH}$	= parameter estimates - standard estimation error in paranthesis - of Y, YT etc. (as defined in section 3 and 4) in log-linear specification;
Time	= parameter estimate of exponential time trend;
ad R^2	= adjusted square of multiple regression coefficient (only given for OLSQ-estimates);
SSR	= sum of squared residuals;
SE	= standard error of the regression;
DW _Y	= Durbin-Watson-statistic for the estimate with observations ordered according to the magnitude of the income variable (Y resp. YT) in the equation;
FH _{CL} FH _{T1}	= F-statistic of homoscedasticity according to Goldfeld & Quandt (14): the sample is divided into two distinct ranges of the grouping characteristics (classes: 7-10 and 11-14 for n = 40, 2-6 and 7-14 for n = 65; time 1961-1965 and 1968-1974); the F-statistic is given as the ratio of the SSR - corrected for the corresponding ratio of degrees of freedom - of the separate estimates for the two ranges;
FS _{CL} FS _{T1} FS _{T2}	= F-statistic of parameter constancy as described by Maddala (17, pp. 198 ff.): the sample is splitted into two or more distinct ranges of the grouping characteristics (classes: 7-10 and 11-14 for n = 40, 2-6 and 7-14 for n = 65; time (T ₁): 1961-65 and 1968-74; time (T ₂): 1961,65,68,71 and 74); for these ranges separate regressions are run and the SSR of these unrestricted estimates are summed up; the F-statistic is obtained by computing the difference of the restricted estimates' SSRs and the summed unrestricted estimates' SSRs as a fraction of the unrestricted estimates' SSRs, both numerator and denominator corrected for the relevant degrees of freedom;

significance levels

- of the F- and DW-statistics:

- * = significant at the 5 % level;
- ** = significant at the 1 % level;
- ++ = DW-statistic in the indifference range at the 1 % and the 5 % level;
- *+ = DW-statistic in the indifference range at the 1 % level, but significant at the 5 % level;

- of the parameter estimates:

all significant at least at the 1 % level if not denoted by "o"
(= not significant);

explanation of tables 6 and 7

row 1 (C_i): charitable giving per average tax return in class i

- column 1: factual values;
- column 2-5: point forecasts and prediction intervals for various prices of charity (10 %-significance-interval as only lower prediction bound, i.d. one-sided test at 5 %-significance level is policy relevant);

row 2 ($\sum C_i$): sum of all gross charitable giving in GI-class i;

row 3 ($\sum C_i (1-p_i)$): sum of all subsidies in GI-class i;

row 4 ($\sum C_i p_i$): social gain per GI-class i, defined as sum of all charitables giving minus sum of all subsidies in GI-class i.

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