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Charitable Giving, Income, and Taxes: An Analysis of Panel Data

By GERALD E. AUTEN, HOLGER SIEG, AND CHARLES T. CLOTFELTER*

As has often been noted, charitable organizations play an important role in American society, and one of their major sources of revenue is private donations. Given this quantitative importance, the continuing interest in tax reform, and the ready availability of data, it is not surprising that the empirical economics literature contains numerous studies of charitable giving, with special emphasis on the effect of taxes. The early empirical studies estimated both price and income elasticities based on cross-section data and found that the elasticity of giving with respect to the tax-defined price of giving was greater than one in absolute value.¹ Recently, however, several studies have challenged these findings.² In particular, Randolph (1995) concludes that estimates of price and income elasticities based on the analysis of cross-section data sets tend to be systematically biased since they incorrectly ascribe permanent significance to variations in prices that are in fact heavily influenced by transitory fluctuations in income. His results imply that individuals tend to increase their gifts to take advantage of unusually high transitory tax rates.

An obvious problem encountered in any attempt to separate permanent from transitory in-

come and price effects is that data sets only contain measures for current income and prices, not their transitory and persistent components. This creates a complicated latent variable problem in estimation. Empirical studies of charitable giving that include permanent income typically attempt to measure it by a weighted average of incomes in two or more years.³ A similar procedure is used for prices. This approach not only presumes that researchers can decompose incomes and prices based on the limited information in the sample, but also that econometricians have for all practical purposes the same information set as individuals in the sample and hence use the same decompositions. As noted earlier by John F. Muth (1960) and Robert E. Lucas, Jr. (1976), the validity of this procedure depends ultimately on the stochastic properties of income and prices. Using finite-lag averages is highly restrictive and typically leads to misspecification problems. In light of these problems, we pursue a new approach for identifying and estimating transitory and persistent price and income effects. Our approach explicitly models the dynamic process determining prices and incomes. This allows us to decompose the sample variances and covariances into transitory and persistent components. We show that this decomposition of the sample variance-covariance matrix is sufficient to identify and estimate the parameters of interest.⁴

During the time period studied in this paper,

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¹ For surveys of the earlier literature see, for example, Clotfelter (1985) or Richard S. Steinberg (1990).

² See, for example, Kevin S. Barrett (1991), William C. Randolph (1995), Barrett et al. (1997), and Jon M. Bakija (1998).

³ An early study to adopt this approach is Martin S. Feldstein and Clotfelter (1976), who employ a two-year average of income to approximate permanent income. More recently, Randolph (1995) uses instruments, including a ten-year average of income.

⁴ Our approach is related to the empirical literature testing the Permanent Income Hypothesis (PIH). Following the seminal work by Robert E. Hall (1978) and Hall and Frederic S. Mishkin (1982), a number of papers have tested the PIH under alternative assumptions. See, among others, Marjorie A. Flavin (1981), Joseph G. Altonji and Aloysius Siow (1987), Angus S. Deaton (1987), Jörn-Steffen Pischke (1995), and Richard Blundell and Ian Preston (1998). In comparison to this literature, our study focuses on one

tax reforms in 1981 and 1986 significantly altered the distribution of tax rates. These reforms not only lowered the level of tax rates for most individuals, they also broadened the income tax brackets, reduced the number and range of marginal tax rates, and hence created a more uniform distribution of tax rates. Most empirical studies have typically focused on the changes in the levels of the tax rates and ignored the fact that these tax reforms had equally large effects on the higher moments of the distribution of taxes. In contrast to almost all prior empirical work, the estimation procedure developed in this paper allows us to account for the changes over time in the underlying distributions of tax rates, incomes, and donations.

We estimate the model using an unusually rich panel data set of tax returns, with up to 15 years of annual data at the individual level and oversampling of affluent individuals. The empirical findings of this paper suggest that persistent price and income changes have substantially larger impacts on charitable behavior than their transitory counterparts. Furthermore, failure to control for deviations from stationarity results in estimates that are sensitive to the choice of the sampling period. Finally, the empirical findings document a rising variance of incomes and a declining variance of prices. The trend toward more inequality in income is stronger than the trend toward more uniformity in tax prices, which partially explains a trend towards more inequality in donations. Because giving patterns to charitable organizations differ by income level, this increasing inequality promises to affect the overall distribution of contributions among nonprofit organizations (Auten et al., 2002).

The rest of the paper is organized as follows. Section I of the paper presents a dynamic model of charitable giving that serves as a motivation for our empirical analysis. We then provide an intuitive explanation of our estimation approach and discuss in detail how it differs from those used in the previous literature. Section II describes the data used in the empirical analysis. Section III presents the estimation results. There is a brief concluding section, Section IV, which

summarizes the policy implications of our analysis and discusses future research.

I. Estimating a Dynamic Model of Charitable Donations

A reasonable starting point for analyzing charitable donations is a dynamic model of individual behavior in the presence of income taxation.⁵ We assume that each individual has preferences defined over current and future levels of consumption, C_t , and charitable donations, G_t . The preferences of an individual are represented by a time-separable (expected) utility function with constant discount factor, β , of the form:

$$(1) \quad E_t \left\{ \sum_{s=t}^{\infty} \beta^{s-t} U(G_s, C_s) \right\}$$

where $U(G_t, C_t)$ denotes the within-period utility function which satisfies the standard regularity assumptions and E_t denotes the expectation operator conditional on information available at time t . Each individual faces a sequence of budget constraints which can be expressed as:

$$(2) \quad C_t + G_t + W_{t+1} = (1 + r_t)W_t + Y_t - T_t(r_t W_t, Y_t, G_t)$$

where W_t denotes wealth at the beginning of period t and r_t is the interest rate. Taxes $T_t(\cdot)$ are a function of income from capital $r_t W_t$, earnings Y_t , and charitable contributions. Individuals maximize expected utility subject to a sequence of budget constraints, which yields two sets of optimality conditions. The first set governs the optimal allocation of resources within periods:

⁵ We follow the empirical literature on charitable donations and analyze the decision problem of individuals treating donations as a private consumption good. Hence, the analysis abstracts from the public good component of donations. For examples of theoretical treatments of equilibrium models of charitable donations, see Theodore Bergstrom et al. (1986), Steinberg (1987), James Andreoni (1989), Amihai Glazer and Kai A. Konrad (1996), and William T. Harbaugh (1998).

specific component of household expenditures and analyzes price effects as well as income effects.

$$(3) \quad (1 - \tau_t) \frac{\partial U}{\partial C_t} = \frac{\partial U}{\partial G_t}.$$

Individuals equate their marginal rate of substitution of donations and consumption to the tax price of donations $P_t = 1 - \tau_t$ (assuming an interior solution). Additionally, optimal intertemporal allocations must satisfy the following Euler equation:

$$(4) \quad \lambda_t = E_t(R_{t+1}\lambda_{t+1})$$

where $R_t = (1 + (1 - \tau_t)r_t)$ and λ_t is the Lagrange multiplier associated with the budget constraint of period t . Equation (4) equates the relative shadow prices of wealth across time periods.

The first-order conditions and budget constraints implicitly define consumption and charitable giving of individuals across time. One of the main problems encountered in empirical analysis is that optimal decision rules generated by these types of models typically do not have nice closed-form solutions. In principle, optimal decision rules can be derived using numerical dynamic programming techniques. This approach is computationally intensive. It is often easier to estimate linear approximations of the decision rules. Most earlier empirical studies on charitable donations can thus be interpreted as estimating different versions of linear approximations of decision rules of the following type:

$$(5) \quad g_t = b_0 + b_1 p_t + b_2 y_t + u + \epsilon_t$$

where ϵ_t captures the time-varying error term and u is a time-invariant fixed effect which captures unobserved heterogeneity (state variables).⁶ To simplify the notation, we suppress the individual-specific index i and also the vector \mathbf{x}_t , which is typically included in all estimated equations to account for observed heterogeneity among individuals. In the current paper we follow common practice and use the logarithms of incomes, prices, and donations in the empirical analysis. We denote the logarithm of these variables by lowercase letters. Individ-

uals surely differ in generosity for a host of reasons unrelated to income and taxes. However most of these unobserved differences in generosity are likely to be time invariant. We take first differences to control for unobserved heterogeneity (fixed effects) in the panel, allowing the equation above to be rewritten as:

$$(6) \quad \Delta g_t = b_1 \Delta p_t + b_2 \Delta y_t + \Delta \epsilon_t.$$

The parameters of this model can be estimated using least squares or IV estimators which control for potential endogeneity of prices.

One of the main drawbacks of the theoretical model presented above is that it does not distinguish between transitory and persistent components of incomes and prices. As Randolph (1995) and others have argued, estimates of price and income elasticities based on equation (6) tend to be systematically biased since they incorrectly ascribe permanent significance to variations in prices and incomes that are in fact heavily influenced by transitory fluctuations. Therefore, we need to decompose income and price into a transitory and persistent component:

$$(7) \quad y_t = y_t^p + y_t^t.$$

$$(8) \quad p_t = p_t^p + p_t^t.$$

Optimal decision rules of the modified model depend on the new state variables y_t^p , y_t^t , p_t^p , and p_t^t . Consequently, the model we would like to estimate is given by the following equation:

$$(9) \quad \Delta g_t = b_1 \Delta p_t^p + b_2 \Delta p_t^t + b_3 \Delta y_t^p + b_4 \Delta y_t^t + \Delta \epsilon_t.$$

Estimates for both price and income elasticities of charitable giving based on equation (6) will be inconsistent if (9) is the correct model specification.

Estimating a model which differentiates between transitory and persistent components of income and prices creates significant additional problems. An obvious problem encountered in estimating equation (9) is that none of the variables on the right-hand side of the equation is directly observed by the econometrician.

⁶ Ideally, we would like to add wealth as a state variable to our decision rule. Unfortunately, our data set does not allow us to approximate wealth in any reliable way. This drawback is shared with almost all previous empirical work in the area.

Researchers, in contrast to individuals, observe only current incomes and prices and not their persistent and transitory components. Data sets contain only measures of the left-hand side of equations (7) and (8) and not the right-hand side. This gives rise to a complicated latent variable problem in estimation. Prior empirical studies that have attempted to distinguish between persistent and transitory effects of any kind on charitable donations share the feature that they avoid this latent variable problem by attempting to decompose observed price and income variables into their unobserved components for each individual in the sample. Given the information available in most data sets, the commonly applied algorithms do not necessarily yield reliable decompositions. This is true not only for studies that use simple averages of income, but also for Randolph (1995), who approximates permanent income as a function of instruments that include a ten-year average of income. These approaches not only presume that the researcher can decompose income and prices based on the limited information in the sample, but also that he or she has, for all practical purposes, the same information set as the individuals in the sample and hence use the same decompositions. As noted by Muth (1960) and Lucas (1976), the validity of this procedure depends ultimately on the stochastic properties of incomes and prices. In particular, using finite-lag averages is highly restrictive.

Another problem associated with the commonly used decomposition and imputation techniques is that they yield proxies for permanent income and prices which are often time invariant in the sample. This makes it impossible to control for fixed effects in estimation since the coefficients for permanent income and prices are not identified. In addition, it seems overly restrictive to assume that permanent income does not change in response to large, unexpected windfalls.

Permanent changes of tax prices arise in some cases due to major revisions of the tax law. The 1981 and 1986 tax reforms were both of this sort. Transitory changes affect prices only in the short run. One example would be the 1985 and 1986 partial and complete deductions of charitable givings for nonitemizers. Other examples include the Economic Recovery Tax Act (ERTA) of 1981, which phased in a series of reductions in marginal tax rates starting with

a 1.25-percent tax credit in 1981 and then 10-, 10- and 5-percent rate cuts for 1982, 1983, and 1984. The Tax Reform Act (TRA) of 1986 had a set of transition tax rates for 1987. The top rates were 50, 38.5, and 28 percent for 1986, 1987, and 1988. All of these created transitory price changes if one views the fully phased-in rate as the permanent rate.

An important insight of recent research on the Permanent Income Hypothesis is that it is not necessary to decompose income and prices for every single individual to identify and estimate the parameters of interest. Rather, a much less restrictive approach is to impose some plausible assumptions on the distribution of income and prices. This makes it possible to decompose the sample variance-covariance matrix, the components of which are sufficient statistics in the estimation algorithm.

To illustrate the basic idea behind the estimation procedure, consider the problem of decomposing the observed variance of income into its two components. The key insight is that any shock causing a persistent change in income, by definition, affects the levels of income in all succeeding time periods. In other words, it reflects a shift in the lifetime profile of income. If we difference the data, this property of persistent income changes implies that these shocks affect only the variance of the growth rate of income, not its autocovariances. In contrast, a transitory change in income affects only the levels of income in the short run. Transitory shocks induce variation of income around its lifetime path. One can show that such a shock will affect both the variance and the autocovariances of the growth rate of income. By analyzing the observed variance and autocovariance of the change in income, we can therefore decompose the observed variance of income into the two components of interest. This idea can be easily extended to study the multivariate distribution of incomes, prices, and donations. In the remainder of this section we formalize these ideas and derive the estimator for the underlying parameters of interest.

Following Hall and Mishkin (1982), we assume that the persistent component of income follows a random walk, $y_t^p = y_{t-1}^p + \xi_t$, where the ξ_t 's are independently and identically distributed (i.i.d.) random variables. By virtue of this shock the path of lifetime income undergoes a permanent shift. Changes exogenous to

the individual, such as promotions or lasting changes in business fortunes, would affect y_t^p . The transitory component of income is given by $y_t^t = \eta_t$. The transitory component hence captures variations around the lifetime path of income. The change in income is given by:

$$(10) \quad \Delta y_t = \Delta y_t^p + \Delta y_t^t = \xi_t + \eta_t - \eta_{t-1}.$$

This specification yields exactly the decomposition of the variance of income discussed above. One can easily show that autocovariances of the change of income are given by:

$$(11) \quad \sigma_{\Delta y_t, \Delta y_{t-s}} = \begin{cases} \sigma_\xi^2 + 2\sigma_\eta^2 & s = 0 \\ -\sigma_\eta^2 & |s| = 1 \\ 0 & |s| > 1 \end{cases}.$$

Hence the variance of the change in income is the sum of the permanent component plus twice the transitory component. The covariance between the change of income and the lagged change of income equals in absolute value the variance of the transitory component. A persistent shock affects only the variance of the change in income while a transitory shock also affects its autocovariances. Appealing to a similar argument, we assume that the transitory and the persistent components of prices are given by the following specification:

$$(12) \quad p_t^p = p_{t-1}^p + \omega_t + a_1 \xi_t$$

$$(13) \quad p_t^t = \zeta_t + a_2 \eta_t$$

where a_1 and a_2 capture the fact that most changes in prices are induced by changes in income. The change in prices is hence given by the following expression:

$$(14) \quad \begin{aligned} \Delta p_t &= \Delta p_t^p + \Delta p_t^t \\ &= \omega_t + a_1 \xi_t + \zeta_t - \zeta_{t-1} \\ &\quad + a_2 (\eta_t - \eta_{t-1}). \end{aligned}$$

Using a similar approach to that in the case of income, we can decompose the variance of Δp_t into its components by analyzing the variances

and autocovariances of prices as well as the covariances between income and prices. This specification nests the case in which all variation in prices is due to income, which is obtained by setting $\sigma_\omega = 0 = \sigma_\zeta$. In this limiting case, we cannot identify the coefficients b_3 and b_4 . Identification of the tax price effects hence rests on the fact that changes in tax prices are not perfectly explained by changes in income, a feature common to the literature on charitable giving and income taxation. One of the attractive aspects of our estimation approach is that it produces estimates of σ_ω and σ_ζ , which allows us to evaluate the identifying assumptions for the price effects. Drawing on the specifications for income and price above, equation (9) can be rewritten using equations (10) and (14) as follows:

$$(15) \quad \begin{aligned} \Delta g_t &= b_1 (\omega_t + a_1 \xi_t) \\ &\quad + b_2 (\zeta_t - \zeta_{t-1} + a_2 (\eta_t - \eta_{t-1})) \\ &\quad + b_3 \xi_t + b_4 (\eta_t - \eta_{t-1}) \\ &\quad + \psi_t + \epsilon_t - \epsilon_{t-1}. \end{aligned}$$

Notice that we have added a persistent shock, ψ_t , to the donations equation. This term reflects persistent shocks of donations which are unrelated to income and prices. The basic econometric model used in the present study is completely characterized by equations (10), (14), and (15). The structural parameters of the three equations are $\theta = (\sigma_\xi, \sigma_\omega, \sigma_\eta, \sigma_\zeta, \sigma_\psi, \sigma_\epsilon, a_1, a_2, b_1, b_2, b_3, b_4)$. In the basic model we assume that all shocks are i.i.d. with mean zero and constant variance. In the empirical analysis, we relax this assumption and include time-varying variances of the persistent and transitory shocks. This allows us to control for the fact that the distribution of taxes, incomes, and donations changed substantially during the sample period.

Estimation of the model proceeds sequentially. First, we follow the empirical literature on the PIH and regress the changes of incomes, prices, and donations on the levels of a number of demographic characteristics. The purpose of these regressions is to control for observed heterogeneity in the sample. We then investigate whether the econometric model described above can replicate the observed variance-

covariance structure of the changes in incomes, prices, and donations.⁷ The data set used in this paper covers the period 1979 through 1993 and hence consists of 15 consecutive time periods. We can show that our econometric model imposes 15 nonzero restrictions on the covariance matrix in each period. If our model is correctly specified, the difference between the observed and the predicted covariance structure should be small if it is evaluated at the true parameter values. We can, therefore, estimate θ using a Minimum Distance Estimator (Gary Chamberlain, 1984).⁸

II. The Data Set

The data used in the present paper are taken from an Internal Revenue Service 15-year panel of tax returns (U.S. Department of the Treasury, 1979–1993). The panel contains information taken from federal income tax returns of more than 20,000 individuals. The original sample was stratified to oversample high-income individuals. These high-income individuals are of particular interest in any study of charitable giving because they contribute large amounts to charity and hence account for a disproportionate fraction of total contributions.⁹ Data on charitable giving is required for the current and previous year to compute first differences. In general this means taxpayers must be itemizers, but in 1985 and 1986 nonitemizers also reported the full amounts of contributions. To avoid spurious changes in income or giving resulting from changes in family composition, taxpayers must have the same marital status in all years. That is, they must remain married or unmarried

as no distinction is made between single, married filing separately, and head of household. Taxpayers that are married for part of the sample period and unmarried for the remainder are retained for the years in the predominant state.

Following previous studies, we measure charitable donations as the amount of charitable deduction claimed on the tax return. The tax price is obtained by computing the tax first with charitable contributions set to zero and then after adding an increment of “predicted” charitable giving.¹⁰ In order to reflect the effects of the tax law on gifts of appreciated property, the price is computed as a weighted average of the price of giving cash and the price of giving appreciated property. The weight is the average percent of noncash giving in eight broad income classes in the 1979–1981 period (ranging from 0.034 to 0.485). Income is defined as constant law-adjusted disposable income.¹¹

The average age of individuals is approximately 49 years at the beginning of the sample in 1980. Furthermore 86 percent of the sample are married, 29 percent are retired, and 26 percent report income from self-employment in any given year of the sample. Table 1 reports the weighted means of the three most important variables in the data set across time.

A number of broad generalizations can be made about individual giving behavior, each of which invites explanation. First, and most obviously, the amount that individuals contribute tends to rise with income. Of course, because of the progressive rate structure in the individual income tax, this also means that giving tends to be inversely related to the price of giving. Price differences among individuals declined throughout the observation period, reflecting tax

⁷ The same approach is taken by Thomas E. MaCurdy (1982), John M. Abowd and David Card (1989), Robert Moffitt and Peter Gottschalk (1995), and Pischke (1995) in studies of earnings, wages, and consumption.

⁸ An Appendix is available upon request from the authors in which we show how to compute the variance-covariance matrix of the three variables as predicted by the baseline econometric model and discuss the estimator above in detail.

⁹ Our sample is probably one of the best available to address this topic, although it may overrepresent households with high transitory income in 1981, the base year for the sample. Since our sample covers almost 15 years, we use an unbalanced panel which avoids serious selection problems associated with balanced panels with many time periods. For example, requiring a balanced panel over such a long time period would eliminate many older tax payers.

¹⁰ The predicted amount of giving is 1 percent of average income, which is approximately the median level of giving as a percent of income. This procedure yields a tax price consistent with the actual costs of giving, but not endogenous to individual donation decisions.

¹¹ An extended discussion of our data set, the exact definitions of the variables used in the analysis, are given in an Appendix, which is available upon request from the authors. To facilitate comparison to previous studies, definitions and sample restrictions generally follow standard practices for charitable-giving studies, such as excluding low-income and dependent filers, and excluding endogenous itemizers who would not have itemized in the absence of charitable contributions.

TABLE 1—WEIGHTED SAMPLE MEANS

	1980	1981	1982	1983	1984	1985	1986
Income	68,744	65,871	64,940	65,926	67,377	66,425	70,394
Price	0.686	0.678	0.705	0.728	0.732	0.744	0.740
Donations	1,750	1,705	1,635	1,712	1,730	1,854	1,903
	1987	1988	1989	1990	1991	1992	1993
Income	74,094	88,020	82,622	85,923	81,039	84,758	85,803
Price	0.753	0.762	0.761	0.761	0.764	0.766	0.761
Donations	1,829	2,119	2,204	2,155	2,078	2,196	2,255

reforms in 1981 and 1986 that reduced marginal tax rates faced by upper-income taxpayers, and increased slightly in 1993 due to the tax increases in the Deficit Reduction Act. The second regularity about charitable giving is that, even among those with similar incomes, the level of contributions differs significantly, with the result that a relatively small number of individuals at each income level accounts for the bulk of all giving. For example, consider the 14 million itemizers with incomes between \$50,000 and \$100,000 in 1995. While these taxpayers made contributions averaging 2.6 percent of their income, the median percentage was only 1.4 percent (Auten et al., 1997 Table 1).

III. Estimation Results

The estimation proceeds in two steps. First, we control for differences in observed heterogeneity among individuals and regress the changes in incomes, prices, and donations (in logarithms) on a number of exogenous characteristics. In the regressions we use dummy variables indicating whether an individual received wage income, is self-employed, retired, married, a household head, or has children as regressors, variables which previous studies have found to affect contributions. We also control for age by specifying the conditional expectation as cubic in age and use year dummy variables to capture time effects. We pool the observations across time periods and estimate the parameters of the simple regression models using ordinary least squares (OLS). In the second stage of the analysis, we compute the covariance matrix

of the residuals of these regressions, which is reported in Table 2.¹²

The first section of the table gives correlations for contemporaneous changes in the three variables. For income and prices, the correlations range from -0.17 to -0.45 reflecting the progressive rate structure of the income tax. The corresponding correlations between income and donations are positive, as expected, with a median value of 0.32 . The correlations between changes in price and donations range from -0.13 to -0.27 throughout the observation period. The remainder of the table shows correlations of each variable to the next year's value of each of the three. Particularly noteworthy are the first-order autocorrelations of income, prices, and donations. They are negative without exception, indicating a large transitory component in the variances of incomes, prices, and donations. The stationary econometric model also implicitly assumes that the growth rates of the three variables of interest follow a multivariate moving average (MA) process, and that all correlations are constant across time periods. An inspection of Table 2 shows, however, that the data do not exhibit this property. There is a substantial amount of variation in the estimated correlations across time, which suggests that a nonstationary version of our model is more appropriate. The MA(1) framework also implies that all second- and higher-order correlations should be equal to zero. In our sample, we find

¹² We also investigated in earlier work whether the high-income part of the sample had a different covariance structure than the full sample and found no evidence in favor of this hypothesis.

TABLE 2—CONTEMPORANEOUS AND FIRST-ORDER CORRELATION COEFFICIENTS

	1980	1981	1982	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	Median
$\Delta y_t, \Delta p_t$	-0.32	-0.24	-0.17	-0.29	-0.32	-0.32	-0.29	-0.30	-0.35	-0.45	-0.43	-0.38	-0.34	-0.32
$\Delta y_t, \Delta g_t$	0.30	0.28	0.16	0.30	0.32	0.28	0.32	0.26	0.39	0.42	0.35	0.43	0.36	0.32
$\Delta p_t, \Delta g_t$	-0.18	-0.17	-0.15	-0.24	-0.23	-0.19	-0.23	-0.27	-0.19	-0.20	-0.15	-0.16	-0.13	-0.18
$\Delta y_t, \Delta y_{t+1}$	-0.18	-0.53	-0.22	-0.28	-0.31	-0.28	-0.39	-0.25	-0.34	-0.24	-0.27	-0.22	-0.30	-0.28
$\Delta y_t, \Delta p_{t+1}$	0.08	0.16	0.03	0.07	0.11	0.10	0.12	0.19	0.09	0.10	0.08	0.09	0.01	0.09
$\Delta y_t, \Delta g_{t+1}$	-0.03	-0.09	-0.01	-0.05	-0.05	-0.03	-0.08	-0.08	-0.08	-0.08	-0.05	-0.03	-0.06	-0.05
$\Delta p_t, \Delta y_{t+1}$	0.04	0.11	0.02	0.04	0.09	0.07	0.0	0.11	0.03	0.13	0.11	0.06	0.08	0.07
$\Delta p_t, \Delta p_{t+1}$	-0.32	-0.43	-0.24	-0.32	-0.37	-0.36	-0.39	-0.10	-0.22	-0.35	-0.29	-0.37	-0.23	-0.32
$\Delta p_t, \Delta g_{t+1}$	0.02	0.04	0.00	0.01	0.04	0.04	0.02	0.03	0.04	0.03	0.02	0.02	0.01	0.02
$\Delta g_t, \Delta y_{t+1}$	-0.01	-0.12	-0.03	-0.04	-0.03	-0.03	-0.11	0.00	-0.05	-0.06	-0.01	0.00	-0.06	-0.03
$\Delta g_t, \Delta p_{t+1}$	0.01	0.09	0.01	0.02	0.00	0.02	0.00	-0.07	0.01	0.01	0.00	0.02	0.02	0.01
$\Delta g_t, \Delta g_{t+1}$	-0.27	-0.37	-0.33	-0.31	-0.32	-0.31	-0.31	-0.27	-0.31	-0.34	-0.31	-0.29	-0.36	-0.31

Note: Almost all estimates are significantly different from zero at the 99-percent confidence level.

that most of these correlations are small and not significantly different from zero.¹³

These findings have a number of interesting implications for modeling charitable behavior. First of all, they suggest that habit formation is probably not very important in charitable behavior. If habit formation were important, we would expect that higher-order autocorrelations of donations would be significantly different from zero. However, we find little support for that in our sample. Second, it has been argued in the literature that agents' decisions depend on past or future prices. These dependencies, if important, would be captured in the correlations between donations and lagged changes in prices or lagged donations and current prices. We also find little supporting evidence for that hypothesis.

We estimate two different model specifications. The parameter estimates of the price and income coefficients and the estimated standard errors are shown in Table 3. The results in columns I through III are based on a stationary

model which assumes that the covariance structure is constant during the time period. Our preferred model is the nonstationary model, which relaxes this assumption and allows for time-varying variances of persistent and transitory income and prices. The estimation results for this specification are shown in columns IV through VI. We estimate each model for three subsamples, which allows us to investigate the impact of the two main tax reforms in 1981 and 1986 in detail.¹⁴

When estimating the stationary model (columns I through III), we find that estimates of the price elasticity of giving are sensitive with respect to the sample period. Since we do not believe that the underlying behavioral parameters which characterize the price elasticity of giving changed so much during the time period, we interpret this finding as evidence against stationary models. The main reason for the problems encountered in estimating price and income elasticities is that tax reforms passed during this time period significantly altered the distribution of tax rates. While most empirical

¹³ This result is quite in line with previous research using similar models in other applications. MaCurdy (1982), Abowd and Card (1989), and Pischke (1995) find that changes in earnings follow an MA(2) process. The estimates for the first-order correlations are between -0.25 and -0.4. The second-order correlations are close to zero, which suggests that the gains from including a second-order component are negligible. This implies that the nonstationary MA(1) specification captures the most important features of the covariance structure.

¹⁴ We also estimated pooled regression models using OLS (fixed effects, random effects). We find that the estimated price elasticity is -0.69 (-0.46, -0.68) and the estimated income elasticity is 0.89 (0.36, 0.90). When we estimate a simple cross-section model for 1980, a year in which the maximum tax rate was 70 percent, the price elasticity was -1.16 and the income elasticity was 0.80, which corresponds with the results of many cross-section studies under this tax regime.

TABLE 3—ESTIMATED ELASTICITIES

	I 1980–1983 Stationary	II 1980–1987 Stationary	III 1980–1992 Stationary	IV 1980–1983 Nonstationary	V 1980–1987 Nonstationary	VI 1980–1992 Nonstationary
Persistent price	–1.74 (0.09)	–2.13 (1.17)	–0.31 (0.15)	–0.79 (0.04)	–1.26 (0.04)	–1.26 (0.04)
Transitory price	–0.04 (0.08)	–0.14 (0.20)	–0.02 (0.10)	–0.52 (0.04)	–0.61 (0.04)	–0.40 (0.04)
Persistent income	0.48 (0.03)	0.74 (0.11)	0.91 (0.02)	0.40 (0.02)	0.49 (0.01)	0.87 (0.01)
Transitory income	0.31 (0.02)	0.29 (0.02)	0.30 (0.01)	0.45 (0.01)	0.49 (0.01)	0.29 (0.01)

Note: Estimated standard errors are given in parentheses.

studies have usually focused on the changes in the levels of the tax rates, they have typically ignored the fact that these tax reforms had even larger effects on the higher moments of the distribution of taxes. In particular, the variation in tax prices decreased significantly after 1982 because of the reduction in tax rates under ERTA of 1981 and TRA of 1986.¹⁵ The empirical findings reported in column I through III indicate that failing to control for these changes in the distribution of taxes may lead to price elasticity estimates that are unusually sensitive to the choice of the sample period.¹⁶

The nonstationary specification of our model overcomes most of the drawbacks associated with previous estimators and controls for the changes in the covariance structure of prices, incomes, and giving. The estimates of the persistent price elasticity reported in columns IV through VI range from -0.79 to -1.26 . Although the former is smaller in absolute value than most of the conventional estimates based on cross-section analyses, they are all larger in absolute value than recent estimates of the elasticity with respect to the permanent price based on analyses of panel data.¹⁷ The elasticity of giving with respect to transitory price changes is smaller in magnitude than its permanent counterpart and ranges from -0.40 to -0.61 . These

estimated transitory price effects contrast sharply with previous estimates from panel studies.¹⁸ The point estimates of the elasticity of donations with respect to persistent income shocks range between 0.40 and 0.87. These estimates are certainly within the range of most estimates of both traditional studies using cross-section data and more recent studies employing panel data; they imply that the tax code exerts an impact on donations by affecting disposable income.¹⁹ The estimated elasticity with respect to transitory income ranges from 0.29 to 0.45, making the ratio between permanent and transitory effects roughly two to one. These elasticities are smaller than comparable point estimates from panel studies, but not significantly so.²⁰

To investigate the nature of the changes in the distribution of prices, incomes, and donations more carefully, we plot the estimated variances of the persistent and transitory components of each variable based on the estimation results shown in column VI. The first graph in Figure 1 plots the estimated variances of the transitory and the persistent component of prices during the 1980's. The estimated variance of the persistent component of tax prices shows two spikes which are due to two major tax reforms enacted in the 1980's. These tax reforms "permanently" changed the tax code. The fact that

¹⁵ For 1979 and 1980, income tax rates ranged from 20 to 70 percent. For 1981, ERTA reduced these rates through a 1.25-percent tax credit. For 1982, tax rates were reduced to a range of 12 to 50 percent.

¹⁶ OLS, fixed-, and random-effects estimators also seem to suffer from this problem.

¹⁷ Comparable point estimates from this latter group are -0.51 (Randolph, 1995 p. 724), -0.47 (Barrett et al., 1997 p. 328), and -0.29 and -0.40 (Bakija, 1998 pp. 25–26, 28).

¹⁸ Randolph's basic specification yields a point estimate of -1.55 , and Bakija's (1998 pp. 25–26, 28) equations imply values of -1.15 and -1.96 , respectively.

¹⁹ An exception is Randolph's (1995) estimated permanent income elasticity of 1.14.

²⁰ Randolph (1995 p. 724) produces a point estimate of 0.58 and Bakija (1998 p. 25–26) one of 0.79.

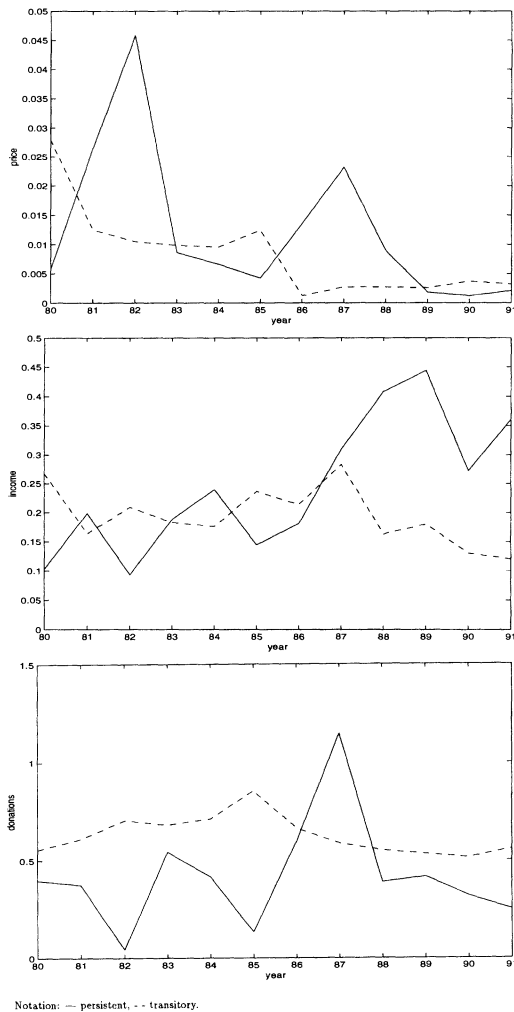


FIGURE 1. ESTIMATED VARIANCES OF PERSISTENT AND TRANSITORY SHOCKS

our estimates of the persistent component of the variances pick up these changes very well lends strong additional support to our framework. Furthermore, we find that tax prices showed a significantly lower dispersion at the end of the 1980's than at the beginning of the decade. This trend toward more uniformity in tax prices is reflected in both the transitory and the persistent components. This finding is, at least partially, a direct result of tax reforms that broadened the income tax brackets and reduced the number and range of marginal tax rates.

The second graph in Figure 1 plots the esti-

mated variances of the two components of income. We find that the estimated variance of the persistent income shocks increased during most of the 1980's, which reflects the well-documented trend toward increasing income inequality during that time period. In particular, there was a significant increase in the variance of the persistent component of income in the second half of the 1980's. There were also significant changes in the variation of donations that are attribute to the residuals of equation characterizing donations; these are illustrated in the third graph of Figure 1. The variances of the persistent component of donations increased through most of the 1980's, peaking in 1987, after which they fell markedly. The transitory component was relatively constant throughout the 1980's. The increase in inequality in donations was, therefore, primarily driven by its permanent component.

IV. Conclusions

Because they utilize measures of current income and contemporaneous price, cross-section studies of charitable giving yield estimates that inevitably confound the permanent and transitory aspects of price and income effects. In order to obtain estimates that separate persistent and transitory effects, this study applies a new empirical framework to a rich set of panel data. This study implies that taxes affect the level of contributions by way of a price effect and an income effect, each of which has two components, a transitory one and a persistent one. The findings of this study suggest that persistent shocks in incomes have a substantially larger impact on charitable donations than do their transitory counterparts. However, the most important behavioral aspect for considerations of tax policy is the persistent price effect, since transitory effects are, by their nature, passing. Through this effect tax reforms can have a long-lasting influence on charitable giving.

Since there continues to be serious debate about tax proposals that could permanently change the price of giving, the effect of persistent price changes on charitable giving is therefore of considerable practical importance. Consider, for example, the effect of a flat-tax proposal, that would eliminate the charitable deduction. For a taxpayer facing a marginal tax rate of 30 percent, this proposal would raise the

price of giving from 0.70 to 1.00. The range of point estimates of the persistent price effect reported in the present paper, -0.79 to -1.26 , would imply that this taxpayer's contributions would eventually settle at a level some 25 to 36 percent lower than it otherwise would have been had the tax code not been changed. A permanent price effect of this size also implies that the cuts in top marginal tax rates during the 1980's probably restrained the increases in giving by the most affluent taxpayers, whose rising incomes would otherwise have boosted their contributions by even more than they did increase. While these changes are smaller than what would have been implied by conventional price elasticities derived from cross-section data, they are nonetheless substantial in magnitude.

The empirical findings of this paper provide ample scope for future research to improve our understanding of the impact of income taxation on individual behavior and the design of tax policies. We view our research as a first step towards the development of alternative empirical frameworks which allow researchers to address questions outside the narrow scope of traditional regression analysis. For example, since tax policies are subject to frequent changes, the uncertainty about future tax policies is likely to influence charitable behavior. Future research needs to address how changes in expectations of future tax policies that these changes engender affect current individual behavior. Alternatively, individuals may learn from past tax reforms, which helps them anticipate future opportunities for giving at favorable tax rates. These issues are inherently difficult to analyze within the traditional regression-based approach since expectations must be modeled explicitly using an adequate stochastic framework. We believe that techniques similar to the ones used in this paper will be useful in thinking about these topics.

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