Form 990 Filing Checklist

Everything to gather before you file — for small and mid-size 501(c)(3) organizations

GivingArc
givingarc.com
Updated September 2026

01 Confirm which return you file

Form	Threshold (IRS)
990-N	Gross receipts **normally ≤ $50,000** — an electronic notice, 8 questions. No extension is available.
990-EZ	Gross receipts **< $200,000 and** total assets **< $500,000**
990	Gross receipts **≥ $200,000 or** total assets **≥ $500,000**
990-PF	Private foundations — regardless of financial status

> **Read the connectors carefully.** The 990-EZ test uses **and**: you must be under both lines. The full 990 uses **or**: crossing either one is enough.

02 Confirm your dates

☐ Fiscal year end confirmed against your IRS determination letter	Not always December 31
☐ Due date calculated: 15th day of the 5th month after year end	Dec 31 year end → May 15
☐ If extending: Form 8868 filed **by** the original due date	Automatic 6 months
☐ Extended date recorded on two people's calendars	Nov 16, 2026 for Dec 31 filers

> **The three-year rule.** Miss the filing three years in a row and tax-exempt status is revoked automatically under IRC §6033(j) — no review, no appeal. The revocation is backdated to the third return's original due date. A missed 990-N counts the same as a missed 990.

03 Financial records

☐ Year-end statement of financial position (balance sheet)	Reconciled
☐ Statement of activities (revenue and expenses)	Full fiscal year
☐ Expenses split into program / management & general / fundraising	Part IX
☐ Written basis for how shared costs were allocated	Salaries, rent, utilities
☐ All bank and investment accounts reconciled through year end	Every account
☐ Restricted contributions tracked separately from unrestricted	Donor-imposed
☐ Noncash contributions listed with values and valuation method	Triggers Schedule M
☐ Grant revenue by funder, with restrictions noted	Federal vs private

04 Governance and people

☐ Current list of officers, directors, trustees and key employees	Part VII

☐	Hours per week and compensation for each person listed	Including $0
☐	Board minutes for the fiscal year	Permanent record
☐	Conflict-of-interest policy and signed annual disclosures	Part VI
☐	Whistleblower and document retention policies	Part VI
☐	Written process for determining executive compensation	Part VI
☐	Independent contractors paid $100,000 or more	Part VII, Section B

05 Program and mission

☐ Mission statement as currently stated in governing documents	Part I and III
☐ Three largest program services described, with expenses for each	Part III
☐ People served or output measures, where you track them	Optional but useful
☐ Any new or discontinued programs noted	Must be reported

06 Schedules commonly triggered

☐ **Schedule A** — public charity status and public support test	All 501(c)(3)s
☐ **Schedule B** — contributors above the reporting threshold	Check current rules
☐ **Schedule G** — fundraising events and gaming	If applicable
☐ **Schedule L** — transactions with interested persons	Board loans, leases
☐ **Schedule M** — noncash contributions	Property gifts
☐ **Schedule O** — narrative explanations	Required for full 990

> Schedule requirements are driven by the trigger questions in Part IV. Answer Part IV first, then pull only the schedules it points to.

07 Before you submit

☐ Prior-year return open beside this one — compare every major line	Explain big swings
☐ Total revenue and total expenses agree with your books	To the dollar
☐ Ending net assets agree with the balance sheet	Common error
☐ EIN, legal name and address match IRS records	Exactly
☐ Board has reviewed the return before filing	Part VI asks
☐ Filed electronically — paper is not accepted for most filers	E-file required

08 After you file

☐ Submission confirmation saved with the return	Proof of timely filing
☐ Public copy posted or ready on request	It becomes public
☐ State charitable registration renewals checked	Separate deadlines
☐ Next year's due date already on two calendars	By name

Sources. Filing thresholds: IRS, "Form 990 series which forms do exempt organizations file." Automatic revocation: IRC §6033(j) and IRS, "Automatic revocation of exemption." Reinstatement after revocation: Rev. Proc. 2014-11. Verified September 2026.