

## **TAX PLANNING TO MAXIMIZE THE BENEFIT OF FACULTY RESEARCH GRANTS**

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This article discusses the tax planning possibilities for maximizing the after-tax benefits of research grants received by academic researchers. The maximum benefit is achieved if the grant qualifies as a "fellowship" as defined in Internal Revenue Code Section 117. The requirements to meet this status can be precarious, and both the grantor and the grantee must carefully structure the conditions of the grant to qualify for beneficial treatment. These conditions are analyzed in the paper.

Business school faculty members are generally expected to do scholarly research and publish their results. To facilitate this work, faculty members often seek additional financial support in the form of research grants. Maximizing the after-tax benefit to the grantee while minimizing the tax cost to the grantor of such awards are the subjects of this paper. The principal means for accomplishing these ends is to qualify the support as an excludable grant ("fellowship") under Internal Revenue Code Section 117. If the grant is excludable under Sec. 117, it is (as explained in detail later) entirely excluded from Social Security (FICA) tax and up to \$300 per month (subject to a lifetime limitation of 36 months) can be excluded from the income tax base. To illustrate the potential benefits of Sec. 117, assume that an unmarried faculty member who has no itemized deductions and is entitled to a single exemption (\$1,080) has, in 1986, a base salary of \$30,000 and receives a 1986 research grant of \$10,000 in addition to expenses. If the grant is treated as additional compensation, it will be subject to both the income and Social Security taxes. Thus, the grantee will pay \$5,509 in federal income tax and \$2,860 in FICA taxes on his base salary and an additional \$3,400 of income tax and \$715 of FICA taxes on the grant. Furthermore, the grantor will have to pay \$715 in FICA taxes on the grant.

If the grant is excludable under Sec. 117, the recipient's tax situation will not change with regard to his base salary, but neither he nor the grantor will pay any FICA taxes on the grant and the income tax on the grant will drop to \$2,090. This savings in income tax assumes the grantee is eligible to exclude \$3,600 of the grant from gross income (12 months x \$300). As a result of qualifying the grant for exclusion the recipient saves \$2,025 and the grantor saves \$715 for a total saving of \$2,740 on a \$10,000 grant.

It should be noted that the tax savings just illustrated are dependent on the recipient's particular tax situation. A married taxpayer in the same situation would save less money if a joint return was filed. There would be no FICA tax savings for a taxpayer whose base salary exceeded the \$42,000 Social Security base; and there would be no income tax savings for a recipient who had previously exhausted his lifetime Sec. 117 exclusion. If by excluding a grant from Social Security taxation, a grantee now finds that his self-employment income is subject to the self-employment tax, the exclusion will actually be detrimental because of the higher rate imposed on self-employment income. In

the rest of this paper it is assumed that it is beneficial to qualify a grant for exclusion under Sec.117.

#### CODE SECTION 117

The exclusion for fellowships is provided by Code Sec. 117. In the case of faculty members who are not degree candidates, Sec. 117(a) allows the exclusion of a scholarship or fellowship grant, but Sec. 117(b) (2) (B) limits this exclusion to \$300 per month, with a lifetime maximum of 36 months. Section 117(b) (2) (A) further requires that the grantor be a tax exempt entity under Sec. 501(c) (3) (including universities and other charities), a foreign government, certain international organizations, or a government agency. Section 117 was added to the Code in 1954 and has remained relatively unchanged since then. Prior to 1954, the Service applied a "gift" test to each grant on a case-by-case basis. The requisite factor to qualify these grants as nontaxable was the grantor's donative intent. Section 117 was enacted to eliminate the inherent subjectivity of this standard and "existing confusion as to whether such payments are to be treated as income or gifts" [U.S. Congress, 1954, p. 16]. According to committee reports accompanying the enactment of Sec. 117, Congress meant to exclude "the portion of a grant which involves research or teaching services performed primarily for the training and education of the recipient," while taxing payments for services or a continuation of wages while an employee is in school. Where an award combined compensation for services and a grant, only the compensation portion was intended to be taxed [U.S. Congress, 1954, pp. 17-18]. The Service later ruled that any amount qualifying under Sec. 117(a), regardless of the Sec. 117(b) limitations, would not be subject to withholding or FICA taxes [Rev. Rul. 60-378, 1960-2 CB 38]. Subsequent court decisions have established that the fellowship provisions of Sec. 117 and the award provisions of Sec. 74(b) are mutually exclusive (see Case v. Comr, 86 T.C. No. 75, 6/23/86). "Fellowships" contemplate stipends for future services, whereas "awards" are received for past accomplishments.

#### THE SECTION 117 REGULATIONS

The terms "scholarship" and "fellowship" are not defined in Sec. 117. This omission of statutory definitions was rectified in 1956 by Reg. Sec. 1.117-3(c), which states that a:

Scholarship generally means an amount paid . . . to . . . a student . . . to aid such an individual in pursuing his studies [and a] fellowship grant generally means an amount paid . . . to . . . an individual to aid him in the pursuit of study or research.

Reg. Sec. 1.117-4(c) amplifies this definition to include amounts paid to individuals to enable them:

[T]o pursue studies or research . . . if the primary purpose of the studies or research is to further the education and training of the recipient in his individual capacity and the amount provided by the grantor . . . does not represent compensation . . . for . . . services.

The regulation further states that neither requiring the recipient to furnish progress reports, nor some incremental grantor benefit from the research will cause a grant to be taxable. However, any amount that represents

compensation for past, present or future services or represents payment for services that are subject to the direction or supervision of the grantor, and any amount paid that enables the recipient to pursue studies or research primarily for the grantor's benefit will not be treated as excludable grants for purposes of Sec. 117.

A summary of the Sec. 117 criteria for exclusion eligibility of a grant to a non-degree candidate is provided in Figure 1. Statutory criteria are enclosed in solid-line boxes; regulatory criteria are enclosed in dotted-line boxes.

#### IRS INTERPRETATION

The most troublesome element of the regulations' fellowship definition has been the "primary purpose" test. This test evolved from Reg. Sec. 1.117-4-(c), which states that a grant will qualify as an excludable fellowship "if the primary purpose of the research or studies is to further the education and training of the recipient and . . . does not represent compensation or payment for services."

The application of the primary purpose test eventually generated enough controversy to involve the Supreme Court (Bingler v. Johnson [394 U.S. 741 (1969)]). In Johnson, the Supreme Court upheld the validity of the Sec. 117 regulations and adopted the "ordinary understanding of 'scholarships' and 'fellowships' as relatively disinterested, 'no-strings' educational grants, with no requirement of any substantial quid pro quo from the recipients" [p. 751]. This case is significant not only because the Court approved the regulations, but also because the Court's emphasis on the substantial quid pro quo aspect of the fellowship issue has formed the basis for many subsequent challenges to fellowship exclusions made by the IRS. In applying Johnson, the Service seems to have ignored the Court's use of "substantial" preceding quid pro quo. In the eyes of the Service, it seems that "any" quid pro quo will have negative consequences to persons seeking a fellowship exclusion.

The extremes to which the Service will push its position are illustrated by Revenue Rulings 72-469 [1972-2 CB 79] and 74-95 [1974-1 CB 39]. The first ruling dealt with an intern's research stipend that was found to be taxable because the product of similar research was "occasionally" usable by the grantor hospital and was sometimes published in that hospital's journals. Ruling 74-95 involved a professor who received a grant to study methods of teaching foreign languages. The announced purpose of the grants, by the National Endowment for the Humanities, was to enable professors to increase their understanding of the subjects and to improve their teaching ability. The grant award criteria included the applicant's ability and the proposed topic's current relevance. The grantor reserved a nonexclusive right to use any publishable matter arising from the funded activities. Based on the retained right to use publishable material, and to a lesser degree the award criteria, the Service determined that the award was made primarily for the grantor's benefit.

The Service's position in both of these rulings seems unsupportable. It is clear that a retained right is beneficial to the grantor. However, the conclusion that a retained right to material that may not be produced (and which may be of no value to the grantor if produced) makes the grant "primar-

ily" for the grantor's benefit, seems highly suspect. Further, the finding that making awards based on the beneficiary's qualifications and the proposed topic's current relevance disqualifies the award under Sec. 117 is untenable. A literal translation of the Service's position is that in order to be within Sec. 117, grants must be made without consideration of either the recipient's qualifications or the proposed topic's current relevance. There is no basis for this position in the Code, regulations, or Johnson decision.

In Revenue Ruling 76-351 [1976-2 CB 34], the Service found that another grant from the National Endowment for the Humanities was within Sec. 117. Under this grant, an English professor was to study the interaction of the sciences and literature with the intention of writing a book on the subject. The grantor retained no rights to any publications arising under the grant. Based primarily on this distinction, the Service reached the opposite conclusion from that in Revenue Ruling 74-95 and found that the grant was solely for furthering the recipient's education. This 1976 ruling makes no mention of how the grant was awarded. Presumably, however, some consideration was given to the investigator's previous experience and the topic's current relevance, but the Service did not consider these factors important enough to mention.

Similarly, in Revenue Ruling 76-463 [1976-2 CB 35], a research grant to a medical resident was found to be within Sec. 117. In this situation, the resident took a leave from his regular duties to pursue research and was not supervised by the grantor. The grantor did not retain any rights to the research results. However, the research was required to be original and the grantor's funding was required to be acknowledged in any publication of the results.

Taken together, these rulings make one point very clear. In the Service's eyes, any retained rights to the product of an award by the grantor will almost certainly take the grant out of Sec. 117. Support for the Service's position where the retained rights are of no significant value to the grantor is unclear. It has been hypothesized that this position results from a misinterpretation of the Johnson decision [Meyers and Hopkins, 1975].

Comparing Congressional committee reports with the Service's interpretation of Sec. 117, it is apparent that the Service's position is frequently more restrictive than Congressional intent would indicate that it should be. The Service often finds a grant to be completely taxable based on very minor grantor benefits, while Congress clearly intended to allow the exclusion of awards even where the grantor received some benefit, such as some teaching services of graduate students. With regard to scholarships and fellowships tied to the performance of some services, in general, the House report calls for an allocation to be made between the payment for services and the excludable amount and notes that: "This allocation of the amount of the grant between taxable and nontaxable portions represents more liberal treatment than is allowed under present practice. Present law taxes the grant in its entirety unless services required of the recipient are nominal" [U.S. Congress, 1954, p. 17]. In situations where the Service finds some grantor benefit, it deems the entire grant to be taxable rather than trying to allocate the amount between taxable compensation and an excludable award as was clearly Congress' intent. In Letter Ruling 8515002 (11/13/84) the Service ruled that a medical internship was not divisible into compensated work and a fellowship for study, with no acknowledgement of Congressional intent. As a result of this conflict between

Congressional intent and the Service's positions, judicial decisions interpreting Sec. 117 are particularly important.

#### COURT INTERPRETATIONS

While the courts have generally supported the Service, they have decided a number of cases in the taxpayer's favor. Although the Supreme Court has upheld the Sec. 117 regulations, the lower courts have, however, refused to grant similar deference to all of the Service's rulings. Where the Service has found a grant to be taxable when the grantor receives almost any benefit, the courts have consistently held that "the ultimate question of whether a payment is an excludable scholarship or fellowship within the meaning of Sec. 117 is, never the less, a question of fact" [Myron W. Mizell v. U.S., 663 F.2d 772 (CA-8, 1981)]. In considering this fact question, the courts have periodically concluded that an award was not taxable despite the grantor's deriving some benefit from the grantee's services.

There has been relatively little litigation involving the taxability of faculty or postdoctoral research grants outside the areas of medicine and the sciences. In several cases, grants have been found to be taxable because it was determined that they were, in fact, payments for services. In Carroll [60 TC 96 (1973)], the Tax Court held that a National Science Foundation grant was given to the taxpayer on the condition that specific research of interest to the Foundation be done. The Court concluded that the Foundation's main motivation for making the grant to Carroll was to get the proposed research done; development of Carroll's research skills was only an incidental byproduct. While Carroll had latitude to decide how the research would be done, he had to do the research to get paid. The Tax Court distinguished this decision from its earlier Vaccaro decision (discussed below) on the grounds that Carroll was required to perform services while Vaccaro was not. As a result, the Court found that the award was taxable compensation.

Similarly, in Utech [55 TC 434 (1970)] and Gibb [501 F.2d 1086 (CA-6, 1974)], postdoctoral fellowships were found to be given in return for specific research that was directly related to the granting organization's function and thus were taxable compensation. In Utech the court noted that the granting agency had no authority to make awards to further the recipients' education; rather, it was required to expend its funds to further its own mission. The court in Gibb determined that the recipient was being paid to work rather than to study. Conversely, the Court in Vaccaro [58 TC 721 (1972)] found a grant to be excludable under Sec. 117 despite the fact that it was treated as compensation subject to withholding for payroll purposes. While the Court noted that withholding of taxes may be indicative of employee status, it ruled that the university's withholding was a formalistic measure to make the funds available to Vaccaro. This is an important point since it appears that many universities automatically withhold on research grants. In Vaccaro's case, the grant was funded by the Department of Health, Education and Welfare and administered by the University of Oregon. Correspondence between University officials and Vaccaro made it clear that neither party considered the grant to be compensation, and that the recipient was free to use the grant essentially as he saw fit. Consequently, the Tax Court found that the grant was not compensation for services, and therefore, excludable. The key difference between the facts in Vaccaro and the cases cited in the preceding two paragraphs is the relatively

unfettered control that Vaccaro had over his own activities under the grant.

In response to the growing number of court cases involving the fellowship issue, the General Accounting Office (GAO) conducted a comprehensive study of the application of Sec. 117 in 1978. The GAO concluded that Sec. 117 and the related regulations were difficult to apply in an even-handed manner principally because Congress had not defined what kinds of receipts qualify as fellowship grants [GAO, 1978]. The GAO criticized the "principal purpose" test as unworkable because, in most grant situations, a dual or mutual benefit is involved [p. 17]. The GAO recommended that all grants be fully taxable if any employment relationship existed between the grantor and the grantee [p. 66].

#### THE PRESENT SITUATION

The problems with the primary purpose test and the quid pro quo criterion have brought grantees who are searching for guidance back to a case-by-case analysis of the facts and circumstances. From the present examination of Sec. 117 and its Congressional purpose, it is clear that the Service applies this section more restrictively than Congress intended. The courts have been more liberal than the Service. However, the Service is the first point of contact between a taxpayer trying to exclude receipts under Sec. 117 and the government. The amount of taxes involved in a fellowship situation often will not justify incurring the expense of litigation. As a result, the practical question that arises in many instances is whether the Service will consider the grant to be compensation or a fellowship.

The previous discussion of the Service's position introduces many of the factors that the IRS considers in determining whether a faculty research grant is taxable compensation or excludable under Sec. 117. However, a more precise reading of the Service's position can be obtained by considering three recently published letter rulings. Although these rulings presumably have no precedential value, they are instructive and obviously represent the Service's position at some level.

In Letter Ruling 8333016 (5/12/83), the Service determined that a summer research grant received by an assistant professor was excludable. The Service noted favorably that the recipient was not obligated to perform services for the grantor, perform functions for the benefit of the grantor, or accept future employment with the grantor.

The Service determined in Letter Ruling 8251111 (9/23/82) that a university professor was not subject to FICA taxes or withholding on grant money received from the university, because the grant was deemed to be an excludable fellowship. The professor received an amount each year equal to two-ninths of his annual university salary to support an ongoing scientific research program on mathematical topics of his choice. The award was separate from his university salary and carried no stipulation that the professor perform any additional duties. It was noted by the Service that the professor did not perform any additional work for the university beyond his normal research. In addition, the research subject was of no direct benefit to the university.

An example of an unfavorable ruling on a research grant can be found in Letter Ruling 8338067 (6/21/83). In this situation, the professor received a grant from his university to conduct research during the summer. Under the

grant's terms, the professor could pursue no other funded research or full time teaching during this period. His acceptance of the grant signified his intent to continue at the university for the following academic year. He agreed to acknowledge the grant on every publication directly resulting from the funded research and agreed to return any income from the project to the university, up to the amount of the award. The Service, citing Bingler v. Johnson, ruled that the grant was taxable compensation because it was given as a quid pro quo.

The factors used to distinguish a fellowship from compensation in these and many other uncited rulings are (1) specific services performed for the grantor, (2) direct grantor benefit from the research, (3) grantor retention of rights to the research product, (4) conditioning the grant on the recipient's remaining at or returning to the grantor's employment, (5) required return of some or all income derived from the funded research to the grantor, and (6) required acknowledgement of the funding on the product. The presence of any of these factors in a grant agreement will increase the risk that the grant will be viewed as fully taxable compensation rather than an excludable fellowship, and they should be avoided when an exclusion is desired.

#### BUSINESS FACULTY RESEARCH GRANTS

Business school faculty research support sources can be classified into three categories: support from taxable entities such as major corporations; support from outside, exempt organizations such as the major foundations and various governmental agencies; and support from the faculty member's institution. In categorizing the source of a grant, one must look at substance as well as form. For example, if Chrysler donates funds to a university to support accounting research and the university selects a faculty member's research for support with no guidance from Chrysler; then the source of the researcher's grant is almost certainly the university and not Chrysler. Conversely, if Chrysler gives funds to a university with the restriction that they can only be used to support research of interest to Chrysler and the university then supports a faculty member under those terms; then in all probability the source of the research support is Chrysler even though the university is writing the checks.

There are two reasons why the source of a research grant is important. First, any grant from a taxable entity to a person who is not a candidate for a degree is not eligible for exclusion under Sec. 117. Second, when the grant comes from the researcher's employer, it is particularly difficult to distinguish the grant from additional, taxable compensation. Thus, assuming that a grant is from an exempt source, the question becomes either is the grant excludable or how can the grant be structured to make it excludable.

#### BLUEPRINT FOR AN EXCLUDABLE GRANT

The previous discussion of the IRS's position provides a blueprint for structuring a grant so that it will be excludable. In particular the "primary purpose" test must be satisfied and the extraction of a "quid pro quo" must be avoided if the grant is to be excludable.

The "primary purpose" test requires that the grant be given to further the

recipient's individual education and training and not represent compensation for services. This test can almost certainly be satisfied by giving the grantee free choice of research topics or at least not making relevance of the proposed research to the grantor's activities one of the award criteria. When the grantor specifies the research topic or narrowly constrains the choice it will be difficult to satisfy the primary purpose test as well as the "quid pro quo" test.

Determining whether a "quid pro quo" is present in a grant situation is not always easy. A review of 186 letter rulings dealing with the exclusion of non-degree candidate grants shows that many factors are cited in denying the exclusion, but only a few seem to be absolutely critical. If the grant is to be excludable, three critical factors must all be avoided. In particular, there should be no services required as a condition of the award (this includes seminar presentations, counseling of students, etc). There should be no future services required (e.g., the recipient should not be required to commit to teaching at the grantor university during the year after the grant period). Finally, no rights to the research product should be retained by the grantor. To avoid the critical conditions and make the grant excludable the grantor will in some cases have to make a choice between extracting a desired condition and the exclusion. In other situations it may be possible to manipulate the grant to effectively, but not explicitly, extract a desired condition and still have the grant be excludable. Where particular services are desired, the grantor must make a choice. If the services are required as a condition of the grant, the payment will almost always be taxable compensation. Similarly, explicitly requiring the recipient to commit to return to the grantor university for the year after the grant period will make the grant compensation. However, merely waiting to award the grant until summer, when most faculty job decisions have been made for the next year, effectively extracts the same condition without jeopardizing the exclusion. Finally, if the research product is likely to be valuable, the grantor must make a choice between retaining rights to that product and the exclusion. When, as in many business school situations, the research product is likely to be uncompensated publication in a scholarly journal, retention of product rights gains nothing but costs the exclusion. Where the grantor is the recipient's employer, as will often be the case with business school faculty, the chances of sustaining a grant's exclusion in the face of an IRS challenge can be improved if the university will state explicitly that no services are required under the grant.<sup>1</sup> In addition it should state that the recipient's research and other activities during the grant period are not subject to any explicit controls and that the university retains no rights to the research product.

When the grant is paid through the faculty member's university an additional complication can arise. An excludable grant is not compensation and is therefore not subject to withholding or FICA taxes [Rev. Rul. 60-378, 1960-2 CB 38]. It should be reported to the IRS on a Form 1099, not a Form W-2. Despite this absolutely clear position, a recent survey of 50 accounting departments at Ph.D. granting institutions revealed that 79% of the respondents were reporting internal research grants as taxable wages on W-2 forms [Outslay and Weber, 1986.]. Presumably, this is representative of business schools as a whole. Assuming that the grant is indeed excludable, this misreporting has two negative consequences. It encourages the IRS to challenge the exclusion, thus causing unnecessary problems for the faculty member. It also results in the university needlessly paying FICA taxes on the grant. Universities that have



been misreporting these grants and faculty members who have been subject to it, can claim refunds for some of their over paid taxes. [See Letter Ruling 8109026 (12/3/80) for the appropriate refund procedures].

Another area in which universities frequently hurt the recipients relates to the grant period. Faculty research grants are often referred to as "summer money" and given for the summer period. By simply changing the grant period from the summer to the full year (assuming research is an ongoing activity), the faculty member's potential annual exclusion can be increased from \$900 (3 mo. x \$300) to \$3,600 (12 mo. x \$300).

Regardless of how the payor reports the grant, the recipient should be aware of the IRS's document matching program. When excluding any amount reported on either a W-2 or a Form 1099, the recipient should attach a schedule showing the full amount reported to the IRS and subtracting out the exclusion to arrive at the net amount reported on the tax return. Failure to furnish this reconciliation is likely to result in a document mismatch and unnecessary correspondence with the Service. The reconciliation should also include an explanation of the basis for the exclusion. Note that it is up to the grantee to prove to the IRS, on request, that (s)he has not previously exhausted the 36 month exclusion period [Wijsman, 54 TC 1539].

#### SUMMARY

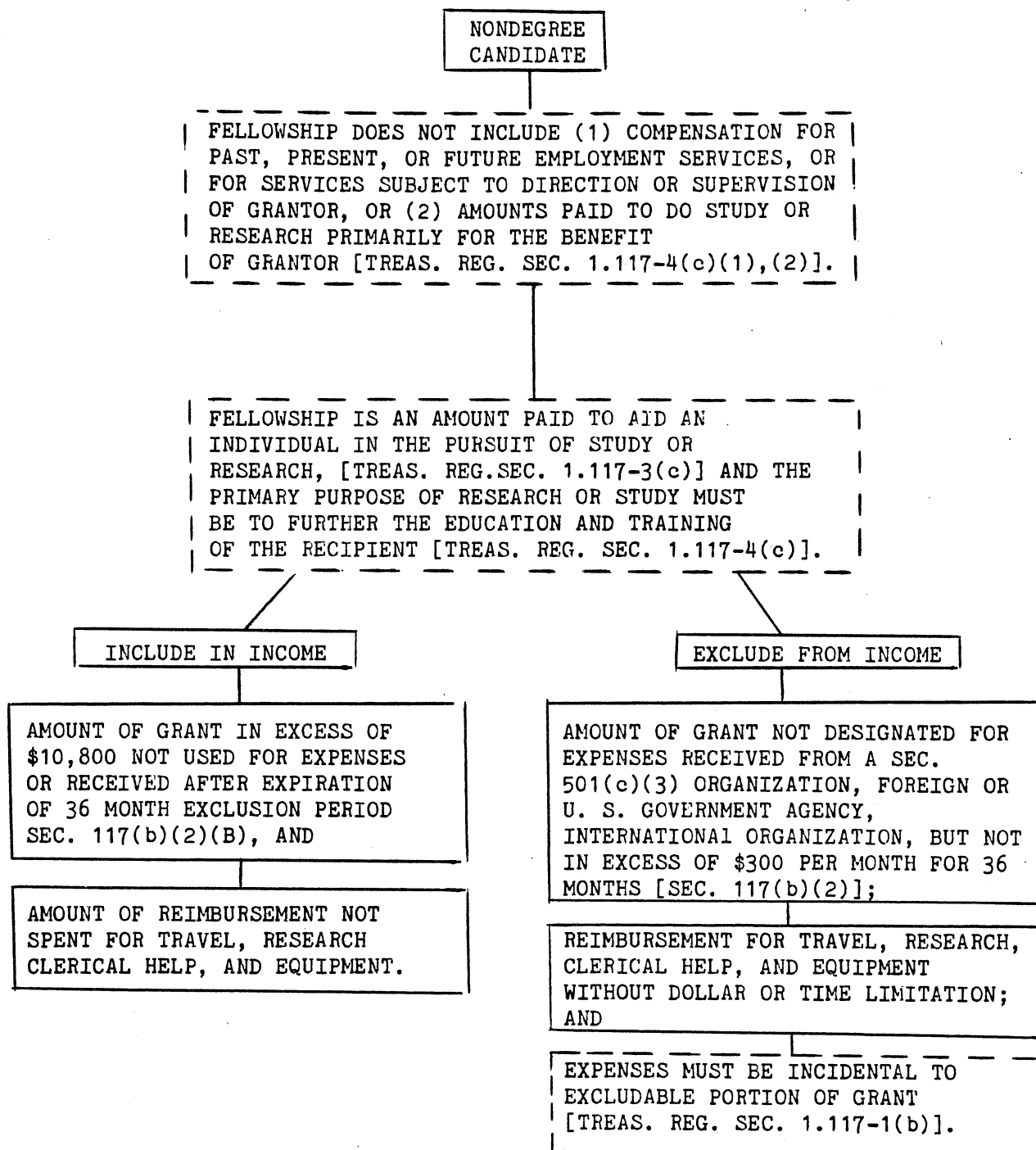
Until Congress provides further guidance, fellowship issues will continue to be resolved on a case-by-case basis.<sup>2</sup> The many variations of grant conditions previously subjected to judicial or administrative review demonstrate factors which have been consistently beneficial or detrimental to grantees seeking exclusion. These factors taken together provide a blueprint for structuring business school research grants so as to be excludable under Sec. 117. Given the lack of well defined standards, however, there is no guarantee that two persons receiving identical grants will receive the same tax result. However, with the proper factual support, claiming the Sec. 117 exclusion for business school research grants is justifiable, and it is beneficial to the grantor and to the recipient to claim it. September 2, 1986

#### FOOTNOTES

1. See Outslay and Weber (1986), p. 58, for examples of how the school or department might word its grant to enhance their fellowship status.
2. Legislation currently pending in Congress may eliminate the exclusion for postgraduate fellowships. The Conference Committee tax plan (H.R. 3838) would remove all non-degree related grants from the definition of a fellowship. If passed, the tax bill will eliminate the income tax incentives for qualifying a grant as a fellowship, but not the withholding or Social Security incentives. For those persons who have not exhausted their lifetime exclusion, consideration should be given to filing amended prior tax returns.

Figure 1

A Summary of Code Sec 117 and Regulations  
As They Relate to Accounting Research Grants



Source: Adapted from Comptroller General of the United States, Changes Needed in the Tax Laws Governing the Exclusion for Scholarships and Fellowships and the Deduction of Job Related Educational Expenses (U.S. General Accounting Office, October 31, 1978), p. 14.

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