

"RENDER UNTO CAESAR?"

Biblical Considerations of the Social Security Tax Exemption for Ordained Ministers

Newly ordained ministers have a critical decision that must be made within a short time following the beginning of their ordained ministry. Unlike other taxpayers, an ordained minister has the option of electing out of the social security (self-employment) tax if he does so on religious grounds within a prescribed period of time. That time frame can quickly expire amidst the pressing demands of pastoral duties, and the implications are crucial to both the minister and his family. A wise decision, based on careful consideration of God's Word, must be made. The purpose of this paper is to assist the young pastor in thinking through the relevant issues biblically. In addition to explaining the tax law and its interpretation within the judicial system, we will examine both the biblical view of government and the minister's personal responsibilities to family and community. *Should* the government provide for the retirement needs of its citizens? If not a mandatory role of government, then *may* it legitimately take on this task? If a minister elects out of the system, what benefits does he forfeit, and how can he fulfill his financial obligations to immediate family, church family, and the larger community? The answers to such questions must be sought through a careful application of God's law to some very specific situations.

Review of the Tax Law: Ministers and Self-Employment Tax

History of the Tax Law in America. The special tax benefits enjoyed by ordained ministers are part of a larger complex of tax exemptions allowed in the sphere of religion. Churches, along with other religious, charitable, and educational organizations, are exempt from the income tax normally imposed on corporations and other business forms,¹ although tax is imposed on profits from any unrelated business activity. They are also typically exempt from local taxes assessed on real and personal property. In addition, charitable gifts to these entities qualify for an individual tax deduction.²

These benefits have been the subject of controversy through the years, resulting in certain changes and limitations.³ In early colonial times, the church-state separation was not so sharp

¹ Internal Revenue Code Sections 501-514 describe organizations exempt from taxation.

² Internal Revenue Code Section 170.

³ A full discussion is beyond the scope of this paper. See Larson and Lowe., p. 56-88, for a summary of some of the relevant litigation through the years.

as it is today. Seventeenth century citizens of Massachusetts were subjected to taxation for the support of the clergy.⁴ This is one example of how the close ties between church and civil government were expressed in terms of tax benefits. After the Revolution, the former colonies began to disestablish their churches to allow freedom to all religious groups.⁵ From these beginnings, we have developed a system that continues to allow significant tax benefits to religion while attempting to maintain a clear separation between church and state. There have been challenges to the privileges enjoyed by churches and ministers, and our Constitution does not specifically prohibit the imposition of tax on religious organizations. Nevertheless, significant benefits do remain in force. The ordained minister's ability to elect out of social security is a particular religious tax benefit, one that has been significantly altered over the past fifty years.

When a man qualifies as a minister for tax purposes, he obtains the benefits of the Internal Revenue Code Section 107 parsonage allowance, but also normally incurs liability for self-employment tax on all of his ministry compensation. This includes not only his taxable earnings, but the parsonage allowance as well.⁶ Because the percentage of that tax (15.3%) is exactly double the amount that would be withheld if he were not a minister (7.65%), the financial burden can be staggering.

Ministers have not always been burdened with the payment of this self-employment tax. For tax years ending before 1955, ministers were specifically excluded from social security taxes. During the years ending after 1954 and before 1968, ministers had the option to elect into social security and pay the self-employment tax.⁷ The law changed entirely for taxable years ending after 1967. Now, a minister must file a timely election under Code Section 1402(e), based on religious objections to the acceptance of public insurance, in order to obtain an exemption from self-employment tax on the earnings from services performed in the exercise of his ministry.⁸ However, the retirement income of a pastor, which may include a parsonage allowance, is exempt.⁹

⁴ Robertson, p. 44-45.

⁵ Robertson, p. 51.

⁶ IRC Section 1402(a)(8); Reg. 1.1402(a)-11.

⁷ Reg. 1402(c)-5(a)(1).

⁸ Reg. 1402(c)-5(a)(2). Note that the exemption does not apply to other earnings, but only to ministerial income.

⁹ Revenue Ruling 58-359, 1958-2 CB 422. This has been subject to discussion in recent years, but the exemption currently remains in effect.

Recent Applications and Interpretations of the Law. In arriving at a definition of the term "minister" for tax purposes, two court cases within the past few years, Wingo and Knight, have involved the self-employment tax issue.¹⁰ In each of these cases, the taxpayer attempted to convince the court that he had *not* qualified as a minister during certain tax years, in order to avoid the liability for self-employment tax. Both individuals had filed the exemption application too late, and the requirement for timeliness was strictly applied. In cases concerning self-employment tax liability for ministers, the courts insist that applicants for exemption observe the rules precisely in order to qualify. There is no *grace* here, only *law*!

We will review the Internal Revenue Code's requirements for obtaining an exemption from self-employment tax, then proceed to consider the tax court's application of these rules. First, the minister must be conscientiously opposed to the acceptance of benefits from public insurance, payable in the event of death, disability, old age, or retirement, based solely on religious principles. He cannot base the election on his desire to conserve cash! Furthermore, the objection must be to *receiving benefits* from public insurance, not merely to the payment of the tax. The objection may take either of two forms: (1) a religious principles test, referring to the principles and discipline of the denomination that ordained the minister; or (2) a conscientious opposition based on the individual religious conscience of the minister.¹¹ He must inform the ordaining, commissioning, or licensing body of his church of his opposition to such insurance. The application for exemption must be filed no later than the due date of the return for the second taxable year for which he has net earnings of \$400 or more from self-employment, any part of which is derived from services performed in the exercise of his ministry. Once the application is approved, the exemption is effective beginning with the first of these two years in which his self-employment earnings totaled \$400 or more.¹² Note that it is not the date of ordination which triggers the running of the time limit, but rather the earning of income from ministry services.

*Olsen v. Commissioner*¹³ involved a Baptist minister who was ordained in 1968 but did not file his application for self-employment tax exemption until 1978. We are not told why he waited so very long after the deadline, but he attempted, unsuccessfully, to contend that Section 1402(g) provided him with

¹⁰ J. S. Wingo, 89 TC 922, Dec. 44,298. J. G. Knight, 92 TC 199, Dec. 45,453.

¹¹ IRS Regulation 1.402(3)-2A(a)(2).

¹² IRC Section 1402(e).

¹³ *Olsen v. Commissioner*, 52 AFTR 2d 83-5207 (709 F.2d 278).

a second opportunity. However, that section applies to members of religious sects which are opposed to public insurance and practice support of dependent individuals in their membership; the exemption, in this case, applies to all self-employment earnings. When one member of a sect applies for exemption under this section and is approved, the Secretary is permitted to notify other eligible members and allow them three months in which to obtain the exemption. This section, which applies to group qualification, clearly did not apply to an individual minister, who is covered by the Section 1402(e) procedures.

*Ballinger v. Commissioner*¹⁴ raises an interesting question which is not fully answered by the court's decision. This petitioner was originally ordained as a Baptist minister in 1969, but in 1973 moved into a ministerial position in the Maranatha Church, which ordained him in 1978. This church opposed the acceptance of public insurance, and in accordance with its teachings, the taxpayer filed an application for exemption from self-employment tax, just after his 1978 ordination. The IRS first approved but later denied that application after discovering his earlier ordination date as well as a prior application (1977) which had been denied. The major question here is whether the minister's change in beliefs, and second ordination in a different church, entitled him to a second opportunity to elect out of the tax.¹⁵ The court noted that Ballinger first became a minister in his new church in 1973, and that his net earnings from self-employment exceeded \$400 in that year. Had he filed his application for exemption by the due date of his 1974 (second year) tax return, the court notes that this "would have been a different case," but he did not. One must recognize that the Code looks to the year in which the taxpayer begins performing the duties of a minister and earning self-employment income, rather than the date of official ordination. This case does leave room for the possibility that a minister might change to a different faith and accept new beliefs regarding the acceptance of public insurance, but great care must be taken to observe the appropriate time requirements if an exemption from self-employment tax is desired.

¹⁴ *Ballinger v. Commissioner*, 52 AFTR 2d 83-5207 (709 F.2d 278).

¹⁵ Second ordination here would be a critical factor. In *Paschall v. Commissioner*, 46 T.C.M. 1197 (1993), a minister changed his convictions based on his understanding of the Bible, but was not re-ordained. Since that change occurred after the deadline, his application for exemption was denied.

None of the court cases have focused on what constitutes a valid religious objection to the receiving of public insurance.¹⁶ The courts are reluctant to enter into discussions that involve religious doctrine. Rather than to do so directly, they have established the requirement that a minister notify his ordaining denomination at the time he files IRS form 4361 to obtain the exemption. The court cases are important in highlighting the urgency for newly ordained pastors to consider the self-employment tax issue at the time of their ordination. Pastoral duties may quickly divert time and attention away from this crucial decision, one that has life-long, irrevocable implications for both the pastor and his family.

The exemption from social security tax is obtained by filing IRS form 4361. The minister must sign, under penalties or perjury, that he objects on religious grounds to *public* insurance that makes payments in the event of death, disability, old age, or retirement. (He need not object to *private* insurance.) As previously noted, religious grounds may be based either on the official teachings of the minister's denomination, or the minister's individual conscientious opposition based on religious factors (not general conscience or economic reasons). If denominational teachings do not forbid participation in the social security system, the minister must take particular care to build a solid exegetical case for exemption. In preparation of form 4361, one prominent CPA firm recommends that the minister attach biblical support to substantiate his religious objections to the tax:

"If, after careful consideration, a minister believes he meets one of the religious opposition tests and chooses to file Form 4361, he should attach either a statement from his denomination's creed demonstrating its opposition to social security for religious reasons or a statement supported by Bible references showing his individual religious opposition on theological grounds."¹⁷

It is crucial that this ethical decision be made by the minister in good conscience, having carefully considered the biblical evidence. Thus we move forward into the exegetical task of gathering such support.

¹⁶ One case, *Hairston v. Commissioner*, T.C. Memo. Dec. 51,025(M) (1995), denied the exemption based on court testimony from a minister that he was not opposed to Social Security on religious grounds, but rather sought the exemption based on financial advice from his accountant.

¹⁷ Guinn, p. 11-22.

Christians and the Civil Government

The Christian's Obligation to Civil Government. Throughout both Old and New Testaments, we encounter a positive, divinely ordained role for the state. As early as Genesis 4:15, we see God instituting retribution if anyone should seek to murder Cain. Similarly in Genesis 9:6, we see the institution of humanly executed punishment for the murder of human beings, made in the image of God.

The two Genesis texts specifically address the government's restraint of murder, but elsewhere we find evidence of a broader role for human civil authority. Much of the Old Testament is specifically concerned with the theocracy and its regulations. That situation is not parallel to the modern believer's circumstances, wherein no political unit is identified as the people of God. Nevertheless, even the Old Testament gives evidence that believers have certain limited obligations to secular government. Daniel, taken captive in the pagan nation of Babylon, learned the literature and language of the Chaldeans (1:4,7), later assuming prominent government positions under Nebuchadnezzar (1:19, 2:48). His actions provide an example of godly submission (within limits) to a pagan government, as well as boldness when commanded to disobey God's law. He refused to defile himself with the king's fine wine and food, yet sought *permission*, in a respectful manner, to adhere to an alternate diet (1:8-16). Daniel's example accords well with New Testament teaching on this issue.

The restraint of sin, applied in Genesis to the matter of murder, is found to be a legitimate function of human government in New Testament times. In 1 Timothy 1:8-11, Paul speaks of the law as made not for the righteous, but rather for those who are rebellious and ungodly. Although this passage most likely is a reference to God's law, the apostle expresses a similar thought in Romans 13 when exhorting believers about their obligations to human government. Civil authority is established by God's ordination, and believers are to subject themselves to it. Paul even calls the civil government a *minister* of God, bearing the sword to avenge evil (13:4). Exegetical treatments of this text emphasize both the divine origin of government and its primary purposes. According to Cranfield, the subjection required here involves a recognition that "one is placed below the authority by God," although "this will not mean an uncritical, blind obedience

to the authority's every command."¹⁸ Considering the context, Murray states that:

"The obligation incident to our subjection to civil authorities belongs to 'the good and acceptable and perfect will of God' (12:2)."¹⁹

Murray also wisely notes the dangers of revolutionary aspirations and potential perversion of Christian freedom.²⁰ Governmental authorities "derive their origin, right, and power from God," not from the consent of those governed or other mutual agreement.²¹ The government is to maintain order and punish criminals who violate that order. The authorities execute both God's decretive will and His preceptive will.²²

Other passages expand on the believer's responsibilities in the civil sphere. Paul strongly exhorts Christians to pray on behalf of all those in authority, that they might live quiet, godly lives and draw others to the Savior (1 Timothy 2:1-4). He reiterates his call for subjection to civil authority in his brief epistle to Titus (3:1). Peter, similarly, calls Christians to honor and submit to their civil rulers, who execute justice and punish evildoers (1 Peter 2:13-17).

Extensive writing through the centuries affirms the positive role of civil government, ordained by God for specific purposes. Reformer Martin Luther, while positing strict limits to the power of government, supported the state as a legitimate, divinely ordained entity:

"Contrary to much teaching of the day that secular authority is a 'pagan, human, ungodly thing,' Luther taught that 'the secular estate is a divine order which every person is bound to obey and honor.'"²³

Calvin envisioned the state as representing law and order, ordained by God to "preserve sinful men from plunging into anarchy and chaos."²⁴ Book IV, Chapter XX, of his Institutes puts forth powerful arguments in defense of the civil government's authority as being ordained by the sovereign Lord who places rulers on their

¹⁸ Cranfield, p. 662.

¹⁹ Murray, p. 145.

²⁰ Ibid., p. 146.

²¹ Ibid., p. 148.

²² Ibid., p. 148.

²³ Mueller, p. 40.

²⁴ Ibid., p. 128.

thrones. In reference to the prophetic warnings of Jeremiah, Calvin expands on the duties of public rulers to execute judgment and righteousness:

"It is righteousness (justice) to take charge of the innocent, to defend and avenge them, and set them free: it is judgment to withstand the audacity of the wicked, to repress their violence, and punish their faults."²⁵

While Calvin and Luther certainly had their differences of interpretation on this issue, both major Reformers conclude that believers are bound to be in subjection to civil government when its laws do not violate God's Word. The Anabaptists, on the contrary, viewed the state as a "necessary evil" and declined to participate in politics, but this position fails to do justice to the teachings of Scripture.²⁶

Other writings have focused not only on divine ordination of government, but its relationship to the church. Some propose identity between the two, others parallel responsibility to achieve mutual goals, and some a dominance of one institution over the other.²⁷ The New Testament era might be viewed as similar to the times of the Jewish exile; God's people are scattered and must live under alien political control.²⁸ In America, we are frequently reminded of the doctrine of church-state separation, but perhaps we ought to think more deeply about the inevitable interaction between these two. As Skillen points out, Christianity is not a Gnostic escape route, but rather "we should have an integral sense of *one life in one world under one King*."²⁹ We live in *God's* world. The apologetic teachings of Cornelius Van Til remind us that there is no neutrality, and there are no brute facts. This applies in the political arena as well. Whitehead reminds us of the godly duties and limitations of government:

"Times have changed, and the government now declares immunity from God's sovereignty. The government believes it can separate itself from the Creator. Romans 13, however, places the government and the church in coterminous positions (neither should dominate the other). They are both ministries of God. The government is to punish the evildoer while protecting the godly in administering justice."³⁰

²⁵ Calvin, p. 659.

²⁶ Stroup, p. 104-5.

²⁷ Stroup surveys a variety of views on the church-state relationship.

²⁸ Stroup, 81.

²⁹ Skillen, *Confessing Christ and Doing Politics*, p. 98.

³⁰ Whitehead, p. 37.

In view of man's sinful attempt at autonomy, it is not surprising to observe that government exhibits a similar pattern. Nevertheless, God's establishment of authority in the home, church, and state are structures meriting our respect.

The force of these biblical passages and Christian writings causes us to think seriously about the authority and responsibility of our civil government, even in instances where pagan rulers take the throne. God sovereignly uses these authorities to accomplish His just purposes. However, these texts focus primarily on the restraint of evil in a fallen world. They are broad in scope. To consider the self-employment tax issue, we must narrow our focus. Christians have a general obligation to submit to civil government when its commands do not conflict with God's law. But what may rightly be included in the positive role of government? Does it include the imposition of taxes, and if so, for what purposes?

The Christian's Obligation to Pay Taxes. In numerous texts, Scripture does demand the payment of lawful taxes assessed by secular governments.

Taxation was a reality in ancient Israel. Jehoiakim had to tax Israel's land in order to pay Egypt (2 Kings 23:35).³¹ Judah was exempted from Solomon's burdensome taxation, described by one author as a divisive maneuver contributing to the split in the kingdom.³² Solomon raised revenues not only through taxation of his citizens, but also the taxing of foreign provinces and vassal states.³³ In time, tax collectors earned a reputation as notorious sinners (Matthew 5:46, 9:9-11, 10:3, 11:19, 18:17, 21:31-32; Luke 3:12, 5:27-30, 7:29, 7:34, 15:1, 18:10-13, 19:2). Zaccheus is one who repented of his greed in extracting excessive taxes from the pocketbooks of his fellows Jews (Luke 19).

Nevertheless, New Testament teachings drive us to conclude that taxes are a lawful obligation of the Christian, even within the confines of a pagan government. The Greek *φορος* is one term for tax, used in the sense of a tribute paid by subjects to a ruling state.³⁴ It is a payment that symbolizes submission and dependence.³⁵ It is a land or poll tax. The term is found in Romans 13:6-7, a key passage concerning our obligations to the

³¹ Merrill, p. 447.

³² Ibid., p. 318-9.

³³ Ibid., p. 307-8.

³⁴ Liddell and Scott.

³⁵ Louw and Nida (57.182).

state, as well as Luke 20:19-26, Luke 23:2, and Mark 12:13-17. A similar term, κηνσος, is used to denote the poll tax paid by each adult male to the government, or the coin with which the tax is paid.³⁶ This word is found in Matthew 22:15-22, Mark 12:13-17, as well as Matthew 17:24-27. The three parallel "render unto Caesar" passages in the synoptics³⁷ use these two terms. There our Lord instructs believers to pay their taxes to Caesar. Near His crucifixion, He is *falsely* accused of teaching the people not to pay taxes. A somewhat more generic term, τελος, is used in both Matthew 17:24-27 and Romans 13:1-7. This word is commonly used to refer to an indirect tax or customs.³⁸

In addition to the direct teachings of Jesus in the gospels, Romans 13 also commands payment of taxes assessed on persons, property, and goods (using the terms φορος and τελος). Since the government has legitimate, God-given functions and requires funds to operate, the payment of taxes is both necessary and lawful:

"If the magistrate is to perform the ministry which is given him of God, he must have the material means for the discharge of his labors. Hence the payment of tribute is not a tyrannical imposition but the necessary and proper participation on the part of subjects in the support of government."³⁹

"Since civil government is constituted for the benefit of society, for the punishment of evildoers and for the praise of those that do well, you should cheerfully pay the contributions requisite for its support."⁴⁰

The sin of the ancient tax collectors was not in the collection of taxes per se, but in their abuse of these *public* funds for their own private purposes. As Hodge notes, the civil authorities are divinely commissioned and authorized to collect taxes to support their work as public servants. God has ordained both the means (tax) as well as the end (government and its duties).⁴¹ The civil ruler who collects taxes is called a *minister* of God (Romans 13:6). Although the term used for "minister" in this verse is a different Greek term than that used earlier, in verse 4, it is no less dignified. Based on other New Testament uses, Murray

³⁶ Louw and Nida, Kiddell and Scott, Bauer.

³⁷ Matthew 22:15-22, Mark 12:13-17, and Luke 20:19-26.

³⁸ Bauer, Liddell and Scott, Louw and Nida (57.179).

³⁹ Murray, p. 154.

⁴⁰ Hodge, p. 408.

⁴¹ Ibid., p. 408.

concludes that "if anything, this designation enhances the dignity attaching to the ministry of rulers."⁴²

On the basis of the biblical evidence, believers are clearly obligated to pay taxes lawfully imposed by the government. Nevertheless, the ordained minister is faced with a legal *choice*. If he sincerely objects to receiving public insurance benefits, on religious grounds, he may lawfully elect not to pay self-employment tax on his ministerial earnings.

Responsibilities to Family, Church, and Community

The ordained minister who elects out of self-employment tax must consider the benefits he forfeits, along with the biblical responsibilities that he must fulfill in some other manner. Social Security would provide family benefits in the event of the young minister's untimely death or disability, in addition to the regular payments available in later years of life. Although the Social Security Administration tracks individual credits as a basis for distribution of benefits, it is important to bear in mind the provision made by the system for those who are poor and needy. Besides consideration of his own immediate family, the minister must examine his responsibilities to those in the church family, including widows and orphans, as well as the larger community. Scripture repeatedly admonishes believers in these areas.

Responsibility to family. A man's basic responsibility to provide for his family needs little defense. The man who fails to do so is considered worse than the unbeliever (1 Timothy 5:8). In the event of the premature death of the primary wage earner, Social Security provides monetary benefits to the widow and children. Benefits may also be obtained in the case of disability, and of course, at retirement. If a minister chooses to elect out of the system, he must thoughtfully consider how his death or disability might impact his family financially, and he must also exercise good stewardship in planning for the later years of his life. Possibilities include the purchase of life insurance, as well as contributions to retirement plans available under Internal Revenue Code Section 403(b) to employees of tax-exempt organizations. A minister may contribute to a 403(b) plan solely through a voluntary salary reduction plan, or his employing church may choose to match his contributions. Personal savings accounts, or careful investment in stocks or other assets, may also assist the minister in fulfilling his responsibilities. Good

⁴² Murray, p. 155.

stewardship might well involve a calculation of the dollar amount of social security tax that would have been paid, followed by a wise investment of that amount for the care of family and others.

Responsibility to the poor. The Social Security system in America provides payments in the event of death, disability, old age, and retirement. Those benefits are thus a manner of caring for the widows, orphans, and elderly of our society. Scripture repeatedly exhorts God's people, under both the Old and New Covenants, to give of themselves for such individuals (including Deuteronomy 14:29, 15:11, 16:11, 16:14, 24:19-21, 26:12; Psalm 94; Psalm 146:9; Isaiah 1:17,23; Job 31:16-23; Matthew 25:36; James 1:27). The witness of the third century Roman church included generosity in this sphere:

"...the distribution of alms was not confined only to believers. The assistance provided by the church was impressive in a world where, except for a period during the second century and again during Julian the Apostate's brief attempt to incorporate the church's ideals within paganism, the government did not expect to undertake a general program of social welfare."⁴³

Such giving, in obedience to God's Word, surely intensifies the church's evangelistic witness in a world where there is much suffering and need. When the government seizes this function and develops an extensive welfare system, it is rather easy for believers to assume that adequate provision has already been made for the poor. It is also difficult, in view of the high levels of taxation, to stretch the remaining dollars beyond the needs of immediate family. The minister who considers exemption from self-employment tax must take into account his responsibilities to the poor. A well planned program to provide for family and community could do much to enhance his ministry and witness.

The question of the government's role in welfare is not an easy one. Scripture designates to the state a clear role in preserving law and order, punishing those who do evil. The Bible does not absolutely forbid governmental involvement in the care of the poor. However, just as individuals are fallen, so also are the structures of society.⁴⁴ There is increasing secularization and religious pluralism, in contrast to earlier societies where religion and the state were closely related.⁴⁵

⁴³ Chadwick, p. 58.

⁴⁴ Wolterstorff, p. 24.

⁴⁵ Ibid., p. 40.

The danger of adopting Marxist ideology in our desire to help the poor is a real one.⁴⁶ Centrally planned economic systems have not truly helped the poor.⁴⁷ Totalitarian government may become the "great provider" for the people and in this manner gain power over them that is nearly idolatrous. Even our own country might be seen as moving in this dangerous direction:

"As the people gain more and more from their god, the state, they ask for more. For example, the United States has evolved from assistance check payments to a new clamoring for a guaranteed income."⁴⁸

The price, however, is significant loss of freedom. Whitehead notes that Sweden takes eighty-five percent of its citizens' paychecks.⁴⁹ Perhaps some limited role in welfare is a proper function of government, but the line is not easy to draw. At some point, the state usurps the responsibilities God has assigned to families and churches.

Olasky notes the biblical emphasis on labor and the honoring of its fruits, such that what we have earned may be used for God's glory, including the assistance of those who are impoverished.⁵⁰ The joy of giving freely to others is not a privilege to be lightly relinquished to the state.

In 1987, the Villars Statement on Relief and Development was formulated by evangelical Christians to address certain issues relating to the care of the poor. Among these concerns were the attraction of centrally controlled systems using coercive measures to supposedly assist the poor, the potential integration of Christianity with the conflicting philosophy of Marxism, and the redistribution of wealth without consideration for incentive and freedom.⁵¹ This group affirmed the *family* as the basic economy unit, with the right to own and control property.⁵² That conclusion seems in line with God's mandate to families and those who head them. Great care must be exercised in allowing the state to assume responsibilities that God has positively placed on this most basic institution.

⁴⁶ Olasky, p. 66 (Pinnock's essay).

⁴⁷ Ibid., p. 80.

⁴⁸ Whitehead, p. 155.

⁴⁹ Ibid., p. 156.

⁵⁰ Olasky, p. 135.

⁵¹ Ibid., p. 143.

⁵² Ibid., p. 144.

Conclusion

In conclusion, we must review and apply the standards of God's eternal Word to the specific situation of modern America and its tax legislation.

First, there is a biblical basis for civil authority. God requires our subjection to state rulers and payment of the taxes needed to maintain our government. Scripture assigns a positive role to the state in terms of justice and the punishment of evil deeds. The Bible does not require the government to provide economically for its citizens, but also does not explicitly or absolutely prohibit the state from any involvement in that sphere.

Second, the believer has positive obligations to his family and to impoverished persons in his community, to provide for their material needs and sustenance. When government assumes an increasingly large role in making such economic provisions for the people, the role of the family is correspondingly diminished. At some point, the government has gone too far.

Finally, to draw adequate conclusions, we must consider our nation's current situation. Schaeffer's *Christian Manifesto* reviews the sad shift in American government, such that secular humanism is now the foundation. Whitehead (*The Separatist Illusion*), writing from a Christian attorney's perspective, documents the massive changes and decay in American society since its founding.

American society is increasingly secular, and its role in economic welfare continues to grow. Biblical territory assigned to the family unit is often usurped by the state. Perhaps we cannot insist on an airtight exegetical case against the social security system. However, based on biblical mandates for government and family, coupled with the present situation in America, we can surely maintain a strong, reasonable case for an ordained minister to elect out of the social security system on religious grounds. He can do so in good conscience, reclaiming for himself and his family the responsibility that God has granted to him as the head of his household.

BIBLIOGRAPHY

References - Theology

Arndt, W. F., Gingrich, F. W. and Danker, F. W. *A Greek-English Lexicon of the New Testament and Other Early Christian Literature*, 2nd ed. Chicago: University of Chicago, 1979.

Kittel, Gerhard and Friedrich, Gerhard (editors), translated by Geoffrey W. Bromiley, *Theological Dictionary of the New Testament* (abridged in one volume). William B. Eerdmans Publishing Company, 1985.

Liddell, Henry George, Scott, Robert, and Jones, Henry Stuart. *A Greek-English Lexicon*, 9th Edition. Oxford: Clarendon, 1940.

Louw, Johannes P. and Nida, Eugene A. *A Greek-English Lexicon of the New Testament Based on Semantic Domains*, 2nd Edition; 2 volumes. New York: United Bible Societies, 1988.

Monographs - Theology

Calvin, John. *Institutes of the Christian Religion*. Grand Rapids: Wm. B. Eerdmans Publishing Co., 1989.

Chadwick, Henry. *The Early Church*. London: Penguin Books, 1967, 1993.

Cranfield, C.E.B., Emerton, J. A., and Stanton, G.N. *The International Critical Commentary, Romans, Volume II*. Edinburgh, T. & T. Clark Limited, 1979.

Hodge, Charles. *Commentary on the Epistle to the Romans*. Grand Rapids, Wm. B. Eerdmans Publishing Co., 1886 (reprinted, May 1993).

Larson, Martin A., and Lowell, C. Stanley. *The Churches: Their Riches, Revenues, and Immunities*. Washington-New York: Robert B. Luce, Inc., 1969.

Merrill, Eugene H. *Kingdom of Priests*. Grand Rapids: Baker Book House, 1987.

Mueller, William A. *Church and State in Luther and Calvin*. Nashville: Broadman Press, 1954.

Murray, John. *The New International Commentary on the New Testament: The Epistle to the Romans*. Grand Rapids, Wm. B. Eerdmans Publishing Co., 1959.

Olasky, Marvin, Editor. *Freedom, Justice, and Hope: Toward a Strategy for the Poor and the Oppressed*. Westchester, IL: Crossway Books, 1988.

Robertson, D.B. *Should Churches Be Taxed?* Philadelphia: The Westminster Press, 1968.

Schaeffer, Francis A. *A Christian Manifesto*. Westchester, IL: Crossway Books, 1981.

Skillen, James W., Editor. *Christian Politics: False Hope or Biblical Demand*. Indiana, PA: Jubilee Enterprises Ltd., 1976.

Skillen, James W., Editor. *Confessing Christ and Doing Politics*. Association for Public Justice Education Fund, 1982.

Stroup, Herbert. *Church and State in Confrontation*. New York: The Seabury Press, 1967.

Whitehead, John S. *The Separation Illusion*. Mott Media, 1982.

Wolterstorff, Nicholas. *Until Justice and Peace Embrace*. Grand Rapids: Wm. B. Eerdmans Publishing Co., 1983.

References - Tax Law

Tax Court Cases

J. G. Knight, 92 TC 199, Dec. 45,453

J. S. Wingo, 89 TC 922, Dec. 44,298

Tax Court Memorandum Cases

Ballinger v. Commissioner, 53 AFTR 2d 84-908 (728 F.2d 1287)

Hairston v. Commissioner, TC Memo Dec. 51,025(M) (1995)

Olsen v. Commissioner, 52 AFTR 2d 83-5207 (709 F.2d 278)

Paschall v. Commissioner, 46 TCM 1197 (1993)

Monographs - Tax Law

Guinn, James E., CPA. *Religious Organizations: IRS and Accounting Issues (A Reference Manual)*. Irving, Texas: Guinn, Smith & Company, Inc., Certified Public Accountants, 1992.

Hammar, Richard R. *Church & Clergy Tax Guide (1997 Edition)*. Matthew, NC: Christian Ministry Resources, 1996.