12 T.C. 580 (1949)

Expenses for transportation and maintenance at a boarding school can be deductible as medical expenses if the primary purpose is to alleviate a specific medical condition, not for general health or personal reasons.

Summary

The Tax Court addressed whether the cost of sending a child with chronic respiratory issues to a boarding school in Arizona was deductible as a medical expense. The court held that expenses directly related to alleviating the child's condition, such as transportation and lodging, were deductible, but educational expenses were not. The court reasoned that the primary purpose of sending the child to Arizona was to mitigate her illness, making the associated costs medical expenses under Section 23(x) of the Internal Revenue Code.

Facts

L. Keever Stringham's five-year-old daughter, Genevieve, suffered from chronic bronchitis, sinusitis, asthma, and anemia. After a severe bronchitis attack in November 1944, Stringham sent Genevieve to the Arizona Sunshine School in Tucson, Arizona, based on a physician's recommendation for a better climate. Genevieve remained at the school for the academic year. Stringham sought to deduct the tuition and transportation costs as medical expenses on his 1944 tax return.

Procedural History

The Commissioner of Internal Revenue disallowed the deduction for tuition and transportation costs. Stringham petitioned the Tax Court, arguing that these expenses qualified as medical care under Section 23(x) of the Internal Revenue Code. The Tax Court partially upheld Stringham's claim, allowing a deduction for transportation and maintenance expenses but not for educational costs.

Issue(s)

Whether expenses incurred for the transportation and maintenance of a child at a boarding school in a different climate are deductible as medical expenses under Section 23(x) of the Internal Revenue Code when the primary purpose is to mitigate a specific medical condition.

Holding

Yes, because the expenses were primarily incurred to alleviate a specific medical condition, and only to the extent that they are not attributable to educational costs. The court allocated a portion of the total expenses as deductible medical expenses.

© 2025 SCOTUSreports.com. All rights reserved.

Court’s Reasoning

The Tax Court analyzed Section 23(x) of the Internal Revenue Code, which allows deductions for “medical care,” defining it as amounts paid for the “diagnosis, cure, mitigation, treatment, or prevention of disease.” The court emphasized that while Section 23(x) provides for medical expense deductions, it must be construed in conjunction with Section 24(a), which disallows deductions for personal, living, or family expenses. The court noted that Congress intended to allow deductions only for expenses “incurred primarily for the prevention or alleviation of a physical or mental defect or illness.” The court determined that the primary motivation for sending Genevieve to Arizona was to mitigate her chronic respiratory issues, especially after an acute bronchitis attack. The court distinguished between deductible medical expenses and non-deductible educational expenses, stating that, “such amounts as are attributable to the cost of educating petitioner’s child while in attendance at the school at Tucson are not deductible as ‘medical expense.’” The court used the *Cohan* rule to estimate the deductible portion of the expenses, allocating $850 to medical care and allowing the transportation costs as a medical expense.

Practical Implications

Stringham v. Commissioner provides guidance on the deductibility of climate-related medical expenses. It clarifies that expenses for travel and lodging can qualify as medical deductions if the primary purpose is to alleviate a specific medical condition. However, the case also highlights the importance of distinguishing between medical and personal or educational expenses. Attorneys and tax advisors should carefully analyze the taxpayer’s motivation for incurring the expense and ensure that the expense is directly related to mitigating a specific medical condition. Later cases have cited Stringham for its approach to determining the primary purpose of an expense and allocating costs between deductible medical care and non-deductible personal or educational items.

© 2025 SCOTUSreports.com. All rights reserved.