## PRIVATE FOUNDATIONS: SELECT VARIATIONS AND POSSIBLE ALTERNATIVES

Nonprofit Organizations Institute UT Law February 9, 2024 Norah L. Jones, C3 Legal Andrew Schulz, Adler & Colvin





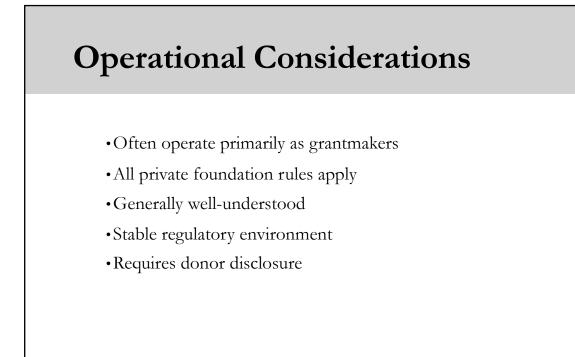
## **Private Non-Operating Foundations**

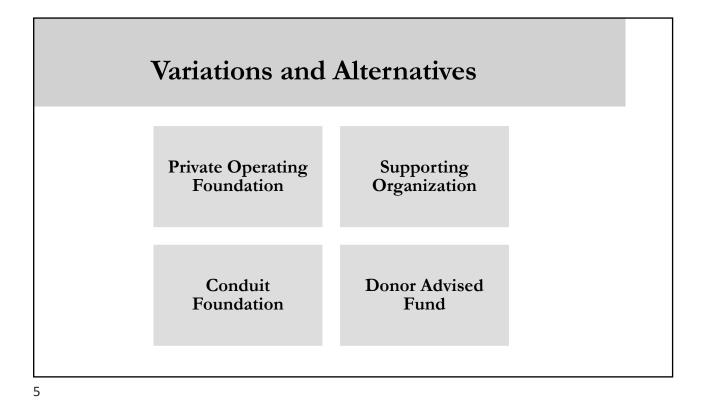
- •Default status for all 501(c)(3) organizations
- Perfectly appropriate and acceptable structure for many organizations
- •Seeking an alternative structure needn't be a goal in itself

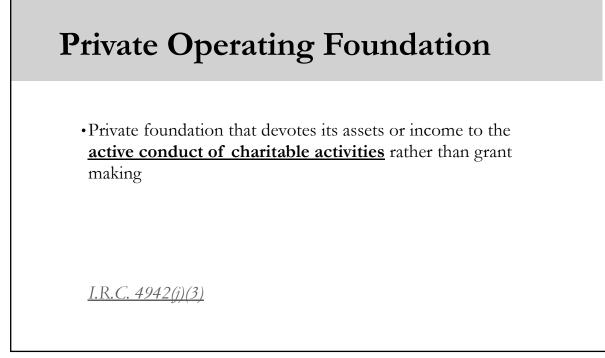
1

## **Private Non-Operating Foundations**

Key Characteristics	
Donor Control	High
Deductibility (Limit)	30/20% AGI
Deductibility (Value)	FMV for publicly traded securities, basis for other
Operational Independence	High
Lobbying Permitted	No
Defining Code Section(s)	509
Operational Complexity	Moderate







Find the full text of this and thousands of other resources from leading experts in dozens of legal practice areas in the <u>UT Law CLE eLibrary (utcle.org/elibrary)</u>

## Title search: Private Foundations: Select Variations and Possible Alternatives

Also available as part of the eCourse 2024 Nonprofit Organizations eConference

First appeared as part of the conference materials for the 41<sup>st</sup> Annual Nonprofit Organizations Institute session "The Middle Zone: DAFs, Supporting Organizations, Private Operating Foundations and Conduit Foundations"