



**LEADING BY EXAMPLE:**  
BEST PRACTICES IN CHARITABLE GIVING

***Beyond the Endowment:  
Investing for Split-Interest Trusts, Private Foundations,  
and Other Charitable Pools***

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## ***The Typical Endowment***

- Exclusively Charitable
- Entirely Tax Exempt (Except for UBTI)
- Perpetual
- No Required Minimum Spending/Payout Rate
- Few Mandatory Investment Limitations

## ***Beyond the Endowment***

- Charitable Lead Trusts
- Charitable Remainder Trusts
- Private Foundations
- Other Charitable Pools (e.g., PIFs)



***Different from endowments,  
in one or more key respects***



## ***Charitable Lead Trusts (CLTs)***

- **Basic Provisions and Tax Treatment**
  - Charitable Lead Annuity Trusts (CLATs)
  - Charitable Lead Unitrusts (CLUTs)
  - Grantor vs. Non-Grantor
- **Constraints**
  - Tax Limitations (Hard and Soft)
  - Fiduciary Limitations
  - Practical Limitations
- **Objectives**
- **Risks**

***Investment and  
Risk Management  
Ramifications***



## ***Charitable Remainder Trusts (CRTs)***

- Basic Provisions and Tax Treatment
  - Charitable Remainder Unitrusts (CRUTs)
  - Charitable Remainder Annuity Trusts (CRATs)
  - Net Income CRUTs (NICRUTs/NIMCRUTs)
- Constraints
  - Tax Limitations (Hard and Soft)
  - Fiduciary Limitations
  - Practical Limitations
- Objectives
- Risks

***Investment and  
Risk Management  
Ramifications***



## ***Private Foundations***

- **Basic Provisions and Tax Treatment**
  - Operating Foundations
  - Non-Operating (Grant-Making) Foundations
  - Pass-Through Foundations
- **Constraints**
  - Tax Limitations (Hard and Soft)
  - Fiduciary Limitations
  - Practical Limitations
- **Objectives**
- **Risks**

***Investment and  
Risk Management  
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***Questions,  
Additional Materials,  
or Further Follow-Up?***

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*These presentation materials (or an expanded version) may also be found on the conference website.*