

43rd Annual Nonprofit Organizations Institute

January 22-23, 2026 • Four Seasons Hotel • Austin, TX

Thursday Morning, Jan. 22, 2026

Presiding Officer:

Tony Fundaro, Philanthropy Southwest - Dallas, TX

7:30 am	<p>Registration Opens</p> <p>Includes continental breakfast.</p>
8:20 am	<p>Welcoming Remarks</p>
8:30 am 1.00 hr	<p>View of the Sector</p> <p>This panel presents an overview of the latest in policy and regulation affecting the nonprofit sector, including Presidential actions, Congress, the IRS and DOJ, the Courts, and the States. As in years past, there is a lot happening—with changes to funding, executive orders and presidential memoranda, proposed regulations, Congressional and agency investigations, the One Big Beautiful Bill Act, and much more. This panel reviews what has happened in the last year and helps you stay abreast of current developments.</p> <p>Alexander L. Reid, Baker & Hostetler LLP - Washington, DC</p>
9:30 am 1.00 hr 0.50 hr ethics	<p>Artificial Intelligence: Practical Steps to Take</p> <p>Artificial intelligence is reshaping how nonprofits operate—but what should you actually do about it? This session explores practical steps for today, next quarter, and next year. Panelists demystify AI's current uses and limitations, share examples of approaches and tools that work (and those that don't), and discuss how nonprofits can harness AI responsibly to advance their missions while managing emerging risks.</p> <p>Adam Crenshaw, Bill & Melinda Gates Foundation - Seattle, WA Zoe Hunton, Gordon and Betty Moore Foundation - Palo Alto, CA</p>
10:30 am	<p>20-Minute Break</p>

CONCURRENT TRACKS

TRACK A: Disaster Relief + DAFs

Presiding Officer:

Mallory Driggers, Philanthropy Southwest - Dallas, TX

10:50 am 0.75 hr	<p>The Changing Landscape of Disaster Relief: Domestic and Foreign Efforts</p> <p>This presentation examines the changing landscape for disaster relief in the United States and internationally, including recent changes affecting agencies such as FEMA and U.S. international aid programs, the shifting allocation of responsibilities among federal, state, and non-governmental actors, and the resulting considerations for practitioners, funders, and nonprofits.</p> <p>April Geruso, Center for Disaster Philanthropy - Austin, TX Danika H. Mendrygal, Mendrygal Law, PLLC - Dallas, TX</p>
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11:35 am	5-Minute Break
11:40 am 0.75 hr	<p>DAFs, Fiscal Sponsors, Supporting Organizations and Other Charitable Giving Intermediaries</p> <p>This panel discussion explores popular vehicles that facilitate indirect giving between donors and end-recipient charities or charitable causes. Through interactive case studies, the panel provides legal and practical guidance about the structure, pros and cons of each vehicle to help donors and their advisors choose the vehicle that is best for them.</p> <p>Darren B. Moore, Bourland, Wall & Wenzel, P.C. - Fort Worth, TX Corey Ziegler, Greater Kansas City Community Foundation - Kansas City, MO</p>
12:25 pm	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

TRACK B: Contracts and Grants

Presiding Officer:

Tony Fundaro, Philanthropy Southwest - Dallas, TX

10:50 am 0.75 hr	<p>Grants, Gifts, and Services Agreements: When and Why the Differences Matter</p> <p>When is funding a gift, when is it a grant, and when is it really a contract for services? This session walks through how to spot the differences, why they matter, and what can go wrong when they're blurred.</p> <p>Effie Babb, Hillspire, LLC - Menlo Park, CA Anne Sherman, The Rockefeller Foundation - New York, NY</p>
11:35 am	5-Minute Break
11:40 am 0.75 hr	<p>Prizes, Grants, and Glory: Navigating the Perils of Individual Awards and Prizes</p> <p>Explore the legal and tax compliance issues faced by private foundations and public charities when awarding individual grants and prizes. Gain practical guidance on navigating the IRS approval process, as well as establishing and implementing eligibility criteria, award processes, recordkeeping and more.</p> <p>Jorge Lopez, Builders Vision - Chicago, IL Bridget M. Weiss, Arnold & Porter Kaye Scholer LLP - Washington, DC</p>
12:25 pm	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

MASTER CLASS A: Cases That Matter Through a *Loper v. Bright* Lens (limited capacity)


10:50 am 1.50 hrs	<p>MASTER CLASS: Regulations, Rulings, and Deference: EO Practice in a Post-<i>Loper Bright</i> World</p> <p>Examine the Supreme Court's decision in <i>Loper Bright</i> and its potential impact on federal tax rulemaking and litigation involving exempt organizations. Discuss what the post-<i>Chevron</i> landscape means for statutory interpretation and challenging IRS positions in EO matters.</p> <p>Alexandra O. Mitchell, RSM US LLP - Seattle, WA Randall Thomas, Morgan, Lewis & Bockius LLP - Washington, DC</p>
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12:25 pm	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>
<hr/> <p>MASTER CLASS B: Navigating a Sinking Client (limited capacity)</p>	
10:50 am 1.50 hrs	<p>MASTER CLASS: When the Ship Hits the Fan: Navigating a Sinking Client</p> <p>This session explores complexities in advising a section 501(c)(3) public charity whose for-profit parent <i>used the charity's funds under the guise that this arrangement was not a loan!</i> Our experience in addressing the resulting federal tax implications, conflicts of interest and the Board's fiduciary role illustrates the huge diversity of needs triggered by excess benefit transactions.</p> <p>Eve Borenstein, Eve Rose Borenstein, LLC & Harmon, Curran, Spielberg & Eisenberg - Washington, DC Stephanie Robbins, Harmon, Curran, Spielberg & Eisenberg - Washington, DC</p>
12:25 pm	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

Thursday Afternoon, Jan. 22, 2026

Presiding Officer:
Megan E. Bell, Morgan, Lewis & Bockius LLP - New York, NY

LUNCHEON PRESENTATION

	<p>Thank You To Our Lunch Sponsor</p> 
12:55 pm 0.75 hr	<p>GC Roundtable: The Many Parts of the Job</p> <p>Everything you wanted to know (but were afraid to ask) about being the general counsel of a large foundation, with a focus on the current context and operating environment.</p> <p>Moderator: Christie Yang, Walton Family Foundation - Washington, DC</p> <p>Panelists: Nishka Chandrasoma, Ford Foundation - New York, NY Erica L. Guyer, The Rockefeller Foundation - New York, NY Kristy Bernard Tsadick, The William and Flora Hewlett Foundation - Menlo Park, CA</p>
1:40 pm	<p>15-Minute Break</p>

1:55 pm
1.00 hr

AG Roundtable: Enforcement in an Age of Transition

State regulators are playing an increasingly prominent role in enforcement and standard setting across the charitable sector. This roundtable discussion focuses on state priorities and approaches to enforcement and compliance, with practical guidance for organizations and their advisors and perspectives from different jurisdictions.

Moderator:

Cindy M. Lott, Indiana University Lilly Family School of Philanthropy - Indianapolis, IN

Panelists:

Leslie J. Friedlander, Office of the Oklahoma Attorney General - Oklahoma City, OK

Gabriella Gonzalez, Texas Office of the Attorney General - Austin, TX

Beth Short, Ohio Attorney General's Office - Columbus, OH

2:55 pm

20-Minute Break

CONCURRENT TRACKS

TRACK C: Fiduciary Duties and Risk Management

Presiding Officer:

Megan E. Bell, Morgan, Lewis & Bockius LLP - New York, NY

3:15 pm
0.75 hr

Fiduciary Duties: Longstanding Tools in an Ever-Evolving Landscape

The ever-evolving environment for non-profit organizations is prompting strategic conversations and requiring boards to focus on their fiduciary responsibilities. This presentation explores fiduciary duties as a tool for boards to navigate these challenging times.

Jonathan S. Blum, Holland & Knight LLP - Dallas, TX

Jennifer L. Franklin, Simpson Thacher & Bartlett LLP - New York, NY

4:00 pm

5-Minute Break

4:05 pm
0.75 hr

Tools for Risk Management

Effective risk management is essential to ensure that a nonprofit complies with the law, safeguards charitable assets and maintains a positive public perception. This presentation explores the key tools that nonprofits can use to identify, assess and mitigate risks related to legal compliance, financial controls and reputation management.

Kay Walther, Blazek & Vetterling - Houston, TX

Maura L. Whelan, Simpson Thacher & Bartlett LLP - New York, NY

4:50 pm

10-Minute Break

TRACK D: Fundraising and Managing Gifts

Presiding Officer:

Jeffrey E. Sher, Fizer Beck - Houston, TX

3:15 pm
0.75 hr

Fundraising Fundamentals: How to Enhance Donor Relationships While Staying Compliant

Discuss the importance of gift acceptance/naming rights policies, legal and operational factors to consider when hiring external fundraisers, and the lifecycle of donor engagement.

Jamie S. Cantara, The University of Texas at Austin - Austin, TX

Nicola Fuentes Toubia, Fuentes Toubia, PLLC - Houston, TX

4:00 pm	5-Minute Break
4:05 pm 0.75 hr	<p>Managing Gifts: Policies, Procedures, and Practical Tips</p> <p>Charitable gifts are the lifeblood of nonprofits, but receiving and managing donations can present ongoing compliance challenges. Discuss key policies relating to the acceptance and use of donations, as well as traps for the unwary.</p> <p>Kevin E. Roe, Davis Wright Tremaine LLP - New York, NY Justin Zaremby, Patterson Belknap Webb & Tyler LLP - New York, NY</p>
4:50 pm	10-Minute Break

MASTER CLASS C: IRS Guidance (limited capacity)

3:15 pm 1.50 hrs	<p>MASTER CLASS: IRS Guidance: What It Is, What It Does, and What's It Worth?</p> <p>Unlock the secrets behind IRS guidance! Led by tax practitioners with experience inside and outside of government, this class breaks down the essentials and demystifies IRS notices, regulations, and rulings into plain English. Discover how IRS guidance shapes compliance, risk, and opportunity for businesses and individuals, and when guidance is best seen as an end or a beginning.</p> <p>Rachel Leiser Levy, Deloitte Tax LLP - Washington, DC Chelsea R. Rubin, Internal Revenue Service - Washington, DC</p>
4:50 pm	10-Minute Break

MASTER CLASS D: Intermediaries (limited capacity)

3:15 pm 1.50 hrs	<p>MASTER CLASS: Intermediaries: Options, Pros, and Cons</p> <p>Intermediaries, used properly, can be powerful tools to enable foundations, charities, and donors to achieve their goals, enhance their effectiveness, and be more efficient. These, and other advantages, have led to increased interest and use of intermediaries. Whether you are new to working with intermediaries, have been at it for years, or even if you are an intermediary, this session examines different types of intermediaries and how people commonly work with them. Also, discuss the advantages and trade-offs inherent in the models, risks that can arise, and how to maximize benefits and reduce challenges.</p> <p>Dahlia B. Doumar, Patterson Belknap Webb & Tyler LLP - New York, NY Andrew C. Schulz, Adler & Colvin - Washington, DC</p>
4:50 pm	10-Minute Break
5:00 pm 1.00 hr ethics	<p>Privilege Considerations and Ethics Issues in Preparedness and Enforcement Matters</p> <p>Explore best practices for preserving the privilege of an internal investigation in the context of an enforcement action, and practical tips to ensure enforcement readiness.</p> <p>Mary T. Henderson, Butler Snow LLP - Austin, TX Amy E. Schuh, Morgan, Lewis & Bockius LLP - Philadelphia, PA</p>

6:00 pm

Adjourn to Networking Reception (6:00 p.m. - 7:00 p.m.)

Join us for a networking opportunity with faculty and colleagues.

Thank You to Our Sponsor



Friday Morning, Jan. 23, 2026

Presiding Officer:

Joyce Hellums, Ernst & Young LLP - Austin, TX

7:30 am

Conference Room Opens

Includes continental breakfast.

8:30 am
1.00 hr

Texas Legislative Update and Political Deep Dive

With Texas's 89th Regular Session and multiple special sessions come and gone, and with primary elections on the horizon, this session covers what happened and where things are going in the world of state policy and politics to help non-profit leaders understand what to expect and how to navigate the new Texas Legislature. Join Luis Soberon, a former staffer and attorney at a non-profit, as he's joined by two veteran Texas political reporters, James Barragán and Brad Johnson, to get an insider's perspective on the forces shaping the Texas capitol.

James Barragán, Spectrum News - Austin, TX
Brad Johnson, Texas Bullpen - Austin, TX
Luis Soberon, Texas 2036 - Austin, TX

9:30 am
1.00 hr

Demystifying the IRS, Treasury, and the Tax Policy Process - One Year Later

Practitioners deal daily with many state and federal laws governing charity operations - but where do they come from? Where do they intersect? How have they changed over time? This presentation takes a bird's-eye view of the laws regulating charities and highlights major developments over the past 50 years

Sasha Abrams, Gordon and Betty Moore Foundation - Palo Alto, CA
Ruth M. Madrigal, KPMG LLP - Washington, DC

10:30 am

20-Minute Break

CONCURRENT TRACKS

TRACK E: Case Studies (Gov't Investigations + IRS Audits)

Presiding Officer:

Joyce Hellums, Ernst & Young LLP - Austin, TX

10:50 am 0.75 hr	<p>Case Study: Governmental Inquiries and Investigations</p> <p>Although private foundations and other nonprofits prepare for and may anticipate IRS audits, nonprofits are now facing a broader and more dynamic range of governmental interactions and inquiries. Explore other types of federal scrutiny and investigations that may impact private foundations and other nonprofits—including executive orders, DOJ investigations, and congressional inquiries. Examine how to navigate each type of inquiry through case studies.</p> <p>Lauren N. Moore, WilmerHale - Washington, DC</p>
11:35 am	<p>5-Minute Break</p>
11:40 am 0.75 hr	<p>Case Study: IRS Audits</p> <p>Although IRS audits follow a relatively standard process and procedure, there are some unique elements when they involve different issues such as private benefit, private inurement, UBIT, or the examination of specific nonprofit industries such as hospitals. This panel looks at how to navigate audits through various case studies.</p> <p>Steve Clarke, Ernst & Young LLP - Washington, DC Elinor Ramey, Lowenstein Sandler LLP - Washington, DC</p>
12:25 pm	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

TRACK F: Case Studies (Whistleblowers + Social Media)

Presiding Officer:

Norman E. Nabhan, Graystone Consulting - Houston, TX

10:50 am 0.75 hr	<p>Case Study: Whistleblower Complaints</p> <p>Explore whistleblower protections, regulatory oversight, and emerging fraud trends impacting nonprofit organizations. Through various examples and case studies, examine how effective governance, compliance controls, and investigative responses may prevent misconduct and strengthen organizational integrity.</p> <p>Katherine Karl, Caplin & Drysdale, Chartered - Washington, DC Vanessa Salinas Beckstrom, PwC - Dallas, TX</p>
11:35 am	<p>5-Minute Break</p>
11:40 am 0.75 hr	<p>Case Study: Navigating the Legal Landscape of Social Media for Nonprofits</p> <p>This session explores the legal risks, compliance obligations, and best practices nonprofits must consider when engaging on social media platforms.</p> <p>Sara L. Hall, ALSAC/St. Jude Children's Research Hospital - Memphis, TN Natalie Malone, ALSAC/St. Jude Children's Research Hospital - Memphis, TN</p>
12:25 pm	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

MASTER CLASS E: Advocacy Issues (limited capacity)

<p>10:50 am 1.50 hrs</p>	<p>MASTER CLASS: Advocacy Unlocked: A Masterclass for Mission-Driven Change</p> <p>Advocacy is one of the most powerful tools nonprofits have to drive lasting change, but for many organizations it can be daunting to navigate. In this interactive session, participants learn how to harness lobbying and other types of advocacy initiatives in support of their organization's mission, while remaining in compliance with the local, state, and federal rules that apply to these activities.</p> <p>Natalie Roetzel Ossenfort, Alliance for Justice - Dallas, TX Irina Petrova, Natural Resources Defense Council - New York, NY</p>
<p>12:25 pm</p>	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

MASTER CLASS F: Multi-Organizational Structures (limited capacity)

<p>10:50 am 1.50 hrs</p>	<p>MASTER CLASS: Multiple-Entity (C3-C4-527) Organizations: Considerations for Funders</p> <p>After briefly reviewing what MEOs are and how they are supposed to operate, this class focuses on the tax and other legal issues - and some non-legal concerns - for funders who are considering supporting an MEO. Topics include grantmaking options for different types of funders, reporting implications, diligence requirements, practical concerns, and disclosure exposure, with time for audience questions.</p> <p>Joel Beck-Coon, Chan Zuckerberg Initiative - Palo Alto, CA Rosemary E. Fei, Adler & Colvin - San Francisco, CA</p>
<p>12:25 pm</p>	<p>Pick Up Lunch (30-Minutes)</p> <p>Included in registration.</p>

Friday Afternoon, Jan. 23, 2026

Presiding Officer:

Kay Walther, Blazek & Vetterling - Houston, TX

LUNCHEON PRESENTATION

	<p>Thank You to Our Lunch Sponsor</p> 
<p>12:55 pm 0.75 hr</p>	<p>Ensuring Operational and Mission Continuity</p> <p>Navigating through disruption with an eye towards mission continuity.</p> <p>Stephen Ives, YMCA of Greater Houston - Houston, TX</p>

1:40 pm

20-Minute Break

CONCURRENT TRACKS

TRACK G: Tools for Impact + Commercial Activities

Presiding Officer:

Kay Walther, Blazek & Vetterling - Houston, TX

2:00 pm
0.75 hr

The 100% Impact Mandate: The Journey to Mission-Aligned Capital

Learn from in-house counsel how their organizations are approaching the legal, governance and cultural complexities of meeting the "all in for impact" mandate. With each organization at a different point in their journey, this session has the perspective of how both a conversion foundation and a foundation within a larger family office platform explore the critical role of the board of directors in establishing this mandate, the helpful tools for deploying investment capital across the spectrum (from negative screens to impact-first PRIs), and strategies for supporting leadership and staff to successfully integrate impact into capital deployment decisions and impact measurement.

Lynell D. Davis, The California Endowment - Los Angeles, CA
Lisa Montez, Builders Vision - Chicago, IL

2:45 pm

5-Minute Break

2:50 pm
0.75 hr

Commercial Activities: Structure Options and Associated Tax Considerations

Nonprofits increasingly engage in commercial activities to support their missions—but how should these ventures be structured? This session covers practical options for organizing commercial operations, from entity selection to managing unrelated business income, along with key tax considerations that drive compliance and long-term success.

Edward T. Chaney, Schell Bray PLLC - Chapel Hill, NC
John Crawford, Ernst & Young LLP - Chicago, IL

3:35 pm

Adjourn

TRACK H: Charitability + Public Policy

Presiding Officer:

Lucille DiDomenico, DiDomenico Group - Dallas, TX

2:00 pm
0.75 hr

Charitability: Bedrock and Beyond

Charitable organizations are built on enduring, well-established principles, yet those principles are continually tested by new and evolving challenges. Examine the bedrock legal foundations that define charitability and illustrate how these core concepts continue to shape philanthropic practice through relevant, real-world examples.

Vanessa (Goodwin) Thames, Heising-Simons Foundation - Houston, TX
Morey O. Ward, Gates Foundation - Washington, DC

2:45 pm

5-Minute Break

2:50 pm
0.75 hr

Fundamental Public Policy and Illegality Doctrines

Examine how the illegality doctrine and the public policy doctrine constrain tax-exempt status and the activities of tax-exempt organizations, with a focus on landmark cases and IRS guidance. Learn how to spot risk and think about the doctrines when developing and evaluating programs.

Randall Thomas, Morgan, Lewis & Bockius LLP - Washington, DC
Caroline Waldner, Morgan, Lewis & Bockius LLP - Washington, DC

3:35 pm

Adjourn

MASTER CLASS G: International Grantmaking (limited capacity)

2:00 pm
1.50 hrs

MASTER CLASS: International Grantmaking

Explore common and less common issues that arise in the context of international grantmaking through a roundtable exploration of several hypotheticals. Topics include: expenditure responsibility; equivalency determinations; use of intermediaries; grants to foreign governments; international lobbying; and compliance with anti-terrorism rules, US sanctions, and FARA.

William D. Fournier, Caplin & Drysdale, Chartered - Washington, DC
Thomas C. Schroeder, Davis Wright Tremaine LLP - Seattle, WA

3:35 pm

Adjourn

MASTER CLASS H: Investment Policy and UPMIFA (limited capacity)

2:00 pm
1.50 hrs

MASTER CLASS: UPMIFA, Prudent Investing, and the Investment Policy

This masterclass takes a deep dive into UPMIFA's prudent investor standard, considerations for ensuring your investment policy advances your mission while satisfying UPMIFA's standards, timely questions arising from the current environment, and practical applications to investment practices.

John N. Bennett, Simpson Thacher & Bartlett LLP - New York, NY
Brittany Cvetanovich, Massachusetts Institute of Technology - Cambridge, MA

3:35 pm

Adjourn