

NONPROFIT ORGANIZATIONS INSTITUTE

Direct Charitable Activities, Recoverable Grants, and Funding Intermediaries and Fiscal Sponsors



Erica Guyer
The Rockefeller Foundation
New York, NY



Shea Loewen Lazarow
Humanity United
San Francisco, CA

The University of Texas at Austin School of Law UT LAW | CLE

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Objective

Private foundations and other funders are empowered to maximize their programmatic impact with a range of tools and funding structures, while maintaining regulatory compliance

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Outline

Direct Charitable Activities

- Definitions and use cases
- DCAs vs. Grants
- Traps for the unwary
- Reporting

Recoverable Grants

- Definitions and use cases
- PF Investment Continuum
- RG Requirements
- Traps for the unwary
- Reporting

Fiscal Sponsors and Intermediaries

- Earmarking overview
- Fiscal sponsorship:
 - Definitions inc. Models A & C
 - Use cases & choosing the right model
- Other intermediaries: Community Foundations, Donor Advised Funds, 'Friends Of' organizations, Pooled Funds
- Traps for the unwary

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What are Direct Charitable Activities (DCAs)?

Direct charitable activities exist when expenditures are made by a private foundation to conduct exempt activities by itself rather than by or through grantee organization(s).

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Why Use a DCA?

Direct charitable activities allow a private foundation to 'get its hands dirty' – participating in charitable work itself rather than exclusively making grants to other organizations.

A PF may choose to do this if, e.g.:

- PF wants to more efficiently and directly accomplish its goals
- PF has experts on staff
- PF wants to be more involved in implementation of work
- PF wants to host a convening of partners
- PF has expenditures related to developing its own programmatic strategies

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DCAs

vs.

Grants

- Significant involvement by PF in direct conduct of charitable activities
- Specific benefit/value to PF
- PF-Led: significant involvement and management by PF staff
- Deliverables: specific work product; services provided to PF
- Ownership: outputs generally owned by PF
- Broad IRS guidelines

- Specifically excluded from DCAs
- Donative: No expected return to PF; focus on benefit to grantee org
- Grantee Led: management and direction by partner org
- Deliverables: primarily reporting and learning
- Ownership: outputs generally owned by grantee
- Specific IRS rules: ER, etc.

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