

Basic Tax Benefits by Exempt Organization Type

The table below identifies the basic tax benefits and limitations between public charities, private foundations and private operating foundations.

CATEGORY	PUBLIC CHARITY (PC)	PRIVATE (GRANT MAKING) FOUNDATION	PRIVATE OPERATING FOUNDATION
INCOME TAX	<ul style="list-style-type: none"> • None, except on unrelated business income (UBI) • No disqualified transaction restriction 	<ul style="list-style-type: none"> • 2% excise tax on net investment income and capital gains (1% in some cases) • 10-30% excise tax on disqualified transactions 	<ul style="list-style-type: none"> • 2% excise tax on net investment income and capital gains (1% in some cases) • 10-30% excise tax on disqualified transactions
CHARITABLE DEDUCTION (BY DONORS, IN YEAR OF GIFT)	<ul style="list-style-type: none"> • Cash: 50% of AGI • Appreciated property (e.g., real estate, stocks): 30% of AGI 	<ul style="list-style-type: none"> • Cash: 30% of AGI • Appreciated property: 20% of AGI, except 30% if <i>qualified</i> appreciated stock (generally means publicly traded stock with readily available pricing data) 	<ul style="list-style-type: none"> • Cash: 50% of AGI • Appreciated property: 30% of AGI