ROSE COMMUNITY FOUNDATION

From Generosity to Legacy: How Community Foundations Help Clients Give with Purpose

Women's Estate Planning Council

November 12, 2026

Agenda

I. Rose Community Foundation

II. Charitable Clients and Giving Vehicles

III. Donor-Advised Funds

IV. Why Work with a Community Foundation?

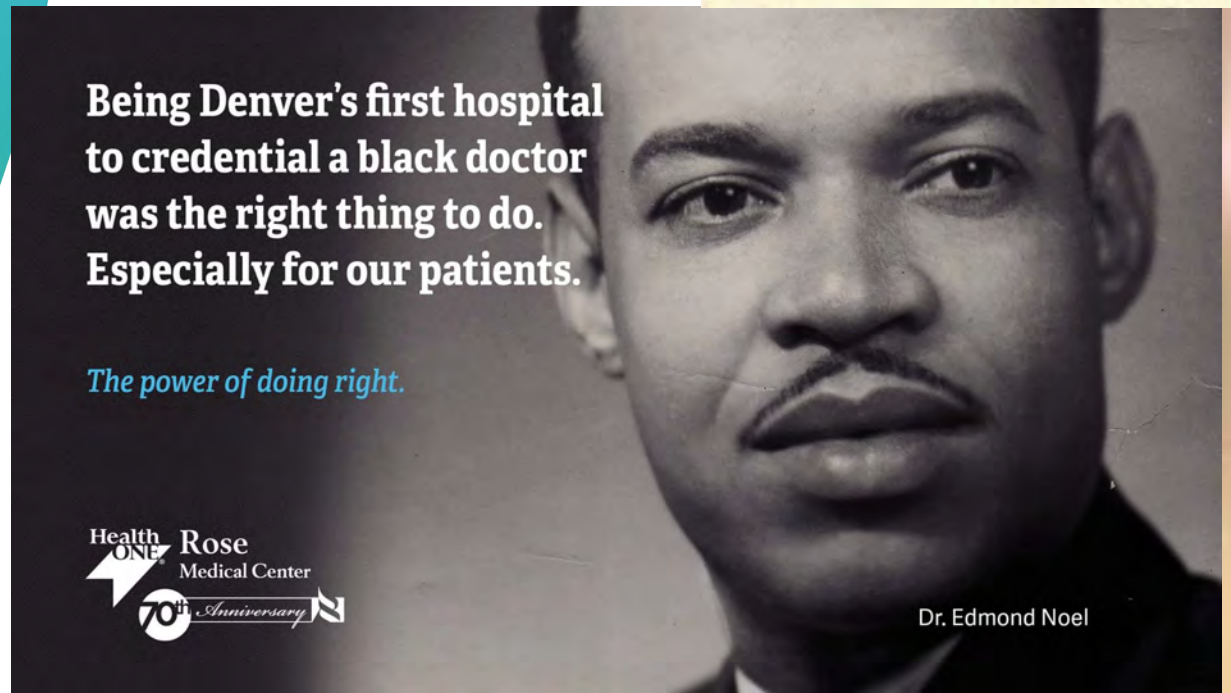
V. Succession Planning and Legacy Giving

VI. Practical Tips for Advising Clients with Charitable Intent

History


GENERAL ROSE MEMORIAL HOSPITAL
GENERAL ROSE MEMORIAL HOSPITAL, DENVER, COLORADO
9B-H510




Being Denver's first hospital to credential a black doctor was the right thing to do. Especially for our patients.
The power of doing right.
Health ONE Rose Medical Center
70th Anniversary
Dr. Edmond Noel


ERECTED BY THE
GENERAL ROSE MEMORIAL HOSPITAL ASSOCIATION
DEDICATED BY
GENERAL DWIGHT D EISENHOWER
AUGUST 31 1948


ROSE COMMUNITY FOUNDATION STRATEGIC FRAMEWORK:
Impact Areas & Changemaking Approaches
VOICE & LEADERSHIP
Policy & Advocacy
Education & Engagement
Storytelling
Leadership
Convening
Partnerships
GRANTMAKING
Discretionary Funds
Donor-Advised Funds
Collaboratives
Fiscal Sponsorships
Capacity Building
GREATER DENVER & BEYOND
IMPACT AREAS
Jewish Life
Education & Economic Opportunity
Health
Community Wellbeing
INVESTMENTS
Optimized Returns
Mission- & Values-Aligned Investing
Impact Investing
DONOR ENGAGEMENT
Donor-Advised Funds
Nonprofit Funds, Trainings & Incentives
Complex Gifts
Legacy Donors
Giving Circles
Fundraising

By the Numbers at Rose Community Foundation

185 Donor-Advised Funds

used by individuals and families for their ongoing charitable giving

166 Legacy Gifts and Bequests

for donors intending to benefit Rose Community Foundation and community nonprofit organizations

$9.4 million

in donor-advised fund and donor designated fund grants in 2025

$10.8 million

contributed to existing and new donor-advised funds in 2025

$101 million

in donor-advised fund grants since our inception

ROSE COMMUNITY FOUNDATION

Charitable Clients and Giving Vehicles

$617.20 billion

In 2025, Americans gave $617.20 billion to charity, growing 5.7% over 2024. When adjusted for inflation, total giving grew by 3.0%.

Donor-advised funds are among the fastest growing forms of giving. Learn more about where grants from DAFs go in the chapter on donor-advised funds.

Giving to five of nine subsectors reached an all time high in 2025 even when adjusted for inflation: **human services; education; health; arts, culture, and humanities**; and **environment/animals**.

Where did the generosity come from?

Contributions by source

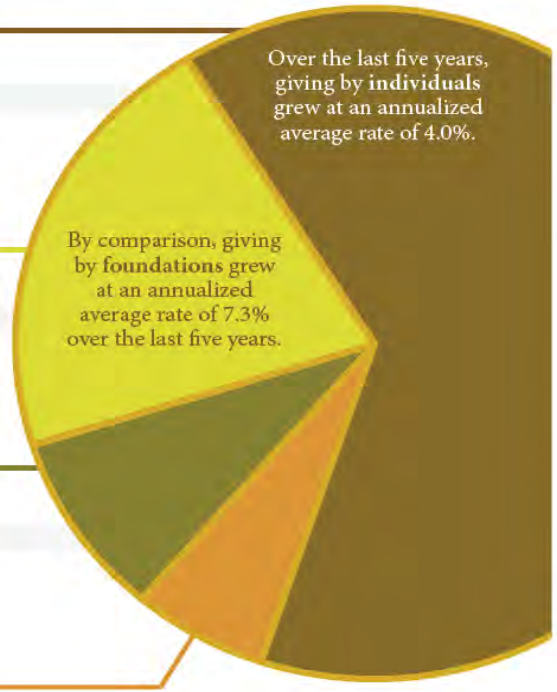
By percentage of the total

64% $394.20 billion
Giving by Individuals
↑ increased 4.1% from 2024

19% $117.15 billion
Giving by Foundations
↑ increased 5.7% from 2024

10% $62.19 billion
Giving by Bequest
↑ increased 19.7% from 2024

7% $43.67 billion
Giving by Corporations
↑ increased 3.1% from 2024



*All figures on this infographic are reported in current dollars unless otherwise noted. The inflation rate in 2025 stood at 2.6%, and results may differ when adjusted for inflation. Learn more in the chapters.

Where did the charitable dollars go?

Contributions by destination



*Percentages for recipient categories are calculated using the sum of recipients, which can differ from total giving for any given year. This difference is called unallocated giving, and totaled -$49.09 billion in 2025.

Giving USA

LILLY FAMILY SCHOOL OF PHILANTHROPY
INDIANA UNIVERSITY

Giving USA Foundation™, **The Giving Institute**, and the **Indiana University Lilly Family School of Philanthropy** are pleased to continue their partnership in providing the most comprehensive, longest-running, and most rigorously researched resource on U.S. charitable giving, *Giving USA: The Annual Report on Philanthropy*. It is a privilege to report on Americans' generosity and related historical trends on U.S. charitable giving.

Visit **givingusa.org**

Audiences for Charitable Giving

- You should always ask your client about charitable giving regardless of age or income – everyone has a legacy to leave.

- Certain factors increase the likelihood that your client may be charitably inclined:
  - Non-parent or child-free
  - Women
  - Loyal/frequent supporters
  - Those who think about charitable giving earlier in their life

- Advisors should convey charitable opportunities to their clients to maximize potential tax benefits.

Charitable Giving Vehicles

- Donor-Advised Funds
- Succession using Donor-Advised Funds
- Legacy giving tools such as:
  - Donor-designated funds
  - Field of interest funds
  - One-time gifts to designated beneficiaries

ROSE COMMUNITY FOUNDATION

Donor-Advised Funds

Donor-Advised Funds

- Charitable giving account stewarded on behalf of and in partnership with an individual, couple, family, group or company

- Establish a succession plan upon opening the fund which is a powerful tool for legacy giving



Authority: IRC § 4966(d)(2) (donor-advised fund defined); § 4966(d)(1) (sponsoring organization); § 6033(k) (sponsor reporting on Form 990, Schedule D)

How a Donor-Advised Fund Works

DONOR



Give cash or appreciated assets like a stock gift

Receives Tax-Deduction

DONOR-ADVISED FUND (DAF)



Funds are invested and can grow tax-free

Donor recommends timing, recipients and $ amount of grants



Authority: IRC § 170(a) (charitable deduction); § 170(f)(18) (sponsor's written acknowledgment of exclusive legal control)

Donor-Advised Funds at Rose Community Foundation

- $10,000 opening threshold; $250 minimum grant amount
- Support nonprofit organizations of your client's choosing locally, statewide and nationally
- Opportunity to name a successor advisor and develop succession plan
- Funds become the property of Rose Community Foundation; grants are recommended by fund advisors
- Tax deduction at the time of funding or adding funds into the donor-advised fund
- No minimum payout rate

Authority: IRC § 170(b)(1)(A), (G) (60% of AGI for cash); § 170(b)(1)(C) (30% of AGI for capital gain property); § 170(f)(18) (acknowledgment); § 4966(d)(2)(A)(ii) (owned and controlled by sponsor). No statutory DAF payout requirement (cf. § 4942 for private foundations).

Investment Approach

- Donor-advised funds are commingled with Rose Community Foundation funds and grow tax-free
- OCIO model works in conjunction with the CFO, the Investment Committee and the OCIO. Each has roles in stewarding the funds of the Foundation
- Investment goal is to protect and grow the portfolio's inflation adjusted value over the long term
- Fundholders may choose between three investment pools:
  - **Growth** - Mix/Allocation: 75% Equity / 25% Fixed Income (including private equity)
  - **Balanced** – Mix/Allocation: 40% Equity / 60 % Fixed Income
  - **Money Market** – Mix/Allocation: 100% Cash / Money Market Funds

Authority: IRC §§ 501(a), 501(c)(3); §§ 170(b)(1)(A)(vi), 509(a)(1) (public charity status of community foundation); Treas. Reg. § 1.170A-9(f)(10)–(14) (community trust single-entity rules)

Contributions into Donor-Advised Funds

- Cash
- Stocks/mutual funds
- Appreciated assets
- Real Estate
- Business interests
- Life Insurance
- Cryptocurrency

Authority: IRC § 170(e)(1) (reduction for ordinary-income and short-term property); § 170(f)(11) and Treas. Reg. §§ 1.170A-16, -17 (qualified appraisal; Form 8283); § 408(d)(8)(B)(ii) (QCDs may not fund a DAF); CCA 202302012 (cryptocurrency appraisal)

Gift Acceptance Policies

- Essential for operation of any nonprofit /nuances with community foundations
- Board delegates gift acceptance to staff with approval of Gift Acceptance Committee for particular gifts
- Addresses complex gifts: how illiquid assets can be accepted under particular provisions of the gift acceptance policy
- When liquidity event occurs, funds may go into donor-advised fund OR be used to build a legacy gift
- Risk and liabilities are strong considerations in gift acceptance

Donor-Advised Fund vs. Private Foundation

Donor-advised fund at a community foundation	Private foundation
Donor recommends grants to qualifying nonprofit organizations.	Donor elects a board to oversee grantmaking and establishes governance documents.
Housed within the Foundation's public charity status; taxes are subsumed within that of the community foundation.	IRS must approve tax-exempt status, and the Private Foundation prepares and files an IRS Form 990 annually.
Highly favorable tax deductions: 60% of AGI for cash gifts and 30% of AGI for appreciated assets.	Less favorable tax deductions: 30% of AGI for cash gifts and 20% of AGI for appreciated assets.
Community knowledge, philanthropic advising, issue research, and grantmaking best practices.	Researches and evaluates its own grants which may include hiring staff.
No excise tax.	2% excise tax on net investment income.
No minimum distribution requirement.	Required to distribute 5% of net asset value annually.

Authority: DAF: IRC § 170(b)(1)(A), (C), (G). Private foundation: § 170(b)(1)(B), (D) (30% / 20% limits); § 170(e)(5) (qualified appreciated stock); § 4940 (1.39% tax on net investment income); §§ 4941–4945; Form 990-PF

Benefits of a Donor-Advised Fund

- Foundation manages all administrative functions, grant processing and back-office support, regulatory compliance, tax returns, audits, no excise taxes
- Maintain your client's philanthropic identity or have the option to give anonymously
- All tax and financial information remains private
- Contribute assets (cash, marketable securities, business interest, real estate) to your client's Fund at any time and benefit from the maximum tax-deduction
- 24/7 access for your client via a secure online fundholder portal
- Access to the Foundation's community knowledge and relationships

Grantmaking Requirements for Donor-Advised Funds

- Grants are **recommended** by the donor; the funds are property of the community foundation
- U.S.-based registered nonprofit (501c3 public charity or other tax-exempt organization) in good standing with the IRS
- Due diligence process
- Donor or related parties may not receive material benefit such as tickets or tables
- Cannot be used to fulfill a pledge or commitment
- Cannot be used to make grants to individuals such as a scholarship

Authority: IRC § 4966(c) (taxable distributions: grants to individuals, non-charitable purposes, or without § 4945(h) expenditure responsibility); § 4967 (more-than-incidental benefit to donor, advisor, or related person); § 4958(c)(2), (f)(7) (excess benefit); Notice 2017-73 (pledges; event tickets); Prop. Treas. Reg. § 53.4966-1 et seq. (REG-142338-07, Nov. 2023)

Why Work with a Community Foundation?

The Benefits

	Community Foundation	Commercial Donor-Advised Fund Sponsor
Flexible complex gift acceptance	✓	✗
Personalized service & local knowledge	✓	✗
Engage the next generation in philanthropy	✓	✗
Support for your client's strategic grantmaking	✓	✗
Educational and networking opportunities	✓	✗

Rose Community Foundation's Approach

- Personalized and tailored support for each fund
- Work directly with an assigned Fund Steward
- Evolving philanthropic journey alongside the Fund Steward



Supports and Services for Your Client's Philanthropy

- Philanthropic values clarification
- Developing mission, vision, and strategy
- Issue research
- **Family meeting facilitation with experience in multigenerational philanthropy**
- Sourcing grantees and due diligence support on topics of your choosing or in the Foundation's areas of focus
- Donor learning, webinars and collaborative funding opportunities



The Cy-Pres Doctrine / Variance Power

- **Cy-Pres Doctrine:** courts may redirect charitable gifts when the intended beneficiary of the gift is unavailable or the bequest is no longer feasible

- **Cy-Pres:** applies to community foundations in the form of Variance Power
  - Board of Trustees may exercise variance power if the beneficiary of a charitable gift is no longer in existence or the purpose for which the gift was given is not feasible

- For some, possibly the single most important reason to leave their succession plan, whether through a donor-advised fund, or separate fund to / through a community foundation

Authority: Treas. Reg. § 1.170A-9(f)(11)(v)(B)(1) (variance power in community trust governing instruments); C.R.S. § 15-1-1106 (UPMIFA release or modification of restrictions)

ROSE COMMUNITY FOUNDATION

Succession Planning and Legacy Giving

Succession Planning for Donor-Advised Funds

Fund Succession Planning

This information helps the Foundation carry out your long-term intentions for the Fund. For Funds without a submitted written succession plan, upon the death or incapacity of the last remaining Advisor (including any successor Advisors), any assets remaining in the Fund will become unrestricted assets of Rose Community Foundation. Donors may recommend that upon the death or incapacity of the Fund's last remaining Advisor listed above, any assets remaining in the Fund shall be distributed as follows. Percentages should equal 100%.

_____% to remain in the Fund to be granted at the recommendation of the named Successor Advisor(s) (complete **Successor Advisor** section below). Donors may use the Notes section below to convey any core values, interest areas, regions or causes they would like Successor Advisors to keep in mind.

_____% Rose Community Foundation: a bequest to the Foundation to serve and strengthen the Greater Denver community into the future.

_____% The Fund for Jewish Life at Rose Community Foundation: a bequest to support Jewish nonprofits in the Greater Denver region into the future.

_____% Total in grants to the following named organizations or endowment funds (complete the **Named Beneficiaries** section below including percentages).

SUCCESSOR ADVISORS

The Donor(s) may designate one or more individuals to serve as successor Advisor(s) of the Fund after the resignation, death or incapacity of the last remaining Advisor listed above. Authorize the successor Advisor(s) to designate second successor Advisors by initialing here: _____

Successor Advisor 1 (optional)

Provide view-only access to the online Fundholder Portal now? ☐ Yes ☐ No

Name _____ Relationship to Donor _____

Address _____

- Requirement to name successor advisors; in the absence of successors, funds revert to the unrestricted endowment of the community foundation

Donor-advised funds succession and lifetime / legacy planning are often intersecting

Succession planning for donor-advised funds:

- **Continuation of the donor-advised fund**
  - Successor advisors
- **Creation of legacy gifts**
  - Donor-designated funds
  - Field of interest funds
  - One-time gifts to designated beneficiaries
- **Outright gift to the community foundation**

Legacy Gifts and Complex Assets

- **Types of legacy gifts we accept at Rose Community Foundation**
  - Gifts through a will or trust
  - Beneficiary designation from retirement assets
  - Owner and beneficiary of a life insurance policy
  - Appreciated assets
- **Complex assets**
  - We’re equipped to accept and manage gifts of:
    - Business interests
    - Privately held stock
    - Real estate
    - Cryptocurrency

Concepts of Legacy Giving

- Donor intent is critical
- Legacy gifts evolve
- Variance Power



ROSE COMMUNITY FOUNDATION

Practical Tips for Advising Clients with Charitable Intent

Practical Tips for Advising Clients with Charitable Intent

- Relationship of Professional Advisors with the community foundation
  - Necessity for a team approach – we do not give legal or tax advice
  - You don’t need to be an expert in charitable matters
  - We are your philanthropic partner
- Don’t be afraid to ask the questions about philanthropic intent
- Consider charitable bunching strategy
- Challenging questions

Key Tax Authorities

Donor-advised fund basics

- IRC § 4966(d)(1)–(2) (sponsoring organization; DAF defined)
- IRC § 6033(k) (Form 990, Schedule D reporting)
- Treas. Reg. § 1.170A-9(f)(10)–(14) (community trusts; variance power)

Income tax deduction

- IRC § 170(a), (b)(1)(A), (C), (G) (60% cash / 30% capital gain property)
- IRC § 170(e)(1) (reductions); § 170(f)(18) (DAF acknowledgment)
- IRC § 170(f)(8), (f)(11); Treas. Reg. §§ 1.170A-13, -16, -17

2026 changes (OBBBA, Pub. L. 119-21)

- IRC § 170(b)(1)(I) (0.5% of AGI floor)
- IRC § 68 (limitation on itemized deductions)
- IRC § 170(p) (non-itemizer deduction; excludes DAFs)

Complex assets

- IRC §§ 512(e), 514, 1011(b); Rev. Rul. 78-197
- Ferguson v. Comm'r, 174 F.3d 997 (9th Cir. 1999)

DAF excise taxes and grant rules

- IRC § 4966 (taxable distributions)
- IRC § 4967 (prohibited benefits)
- IRC § 4958(c)(2), (f)(7) (excess benefit)
- IRC § 4943(e) (excess business holdings)
- Notice 2017-73; Prop. Treas. Reg. § 53.4966-1 et seq. (Nov. 2023)

Private foundation comparison

- IRC § 170(b)(1)(B), (D); § 170(e)(5)
- IRC §§ 4940 (1.39%), 4941–4945; Form 990-PF

Retirement, estate and gift

- IRC § 408(d)(8)(B)(ii) (no QCDs to DAFs)
- IRC § 691 (IRD); §§ 2055, 2522

Colorado law

- C.R.S. §§ 15-1-1101 et seq. (UPMIFA); § 15-1-1106 (modification)

Questions?

Contact Us



Judy Altenberg
Chief Philanthropy Officer
jaltenberg@rcfdenver.org



Sarah James
Director of Donor
Funds & Gift Planning
sjames@rcfdenver.org

ROSE COMMUNITY FOUNDATION



Philanthropy That Aligns with Your Clients' Goals

Turn Charitable Intent into Meaningful Impact.

As a trusted advisor, you're uniquely positioned to help your clients match their financial goals with their desire to give back. When you bring philanthropic strategy into your conversations, you deepen relationships, differentiate your practice — and help your clients make a lasting difference.

Partnering with Rose Community Foundation makes it easy to offer expert philanthropic guidance grounded in deep local knowledge, bespoke giving strategies, and opportunities that align with their values and priorities.

Why Partner with Rose Community Foundation?

Add Client Value

Support your clients in aligning their wealth with their values — whether through lifetime giving, legacy planning, or engaging the next generation.

Strengthen Client Loyalty

Advisors who proactively discuss charitable giving are more likely to retain relationships across generations.

Expand Your Client-services Toolkit

Offer options that include donor-advised funds, legacy gifts, field of interest funds, and complex asset donations — with expert support at every step.

Count on Local Expertise

We understand the Denver region's most pressing needs through our connection to the nonprofit ecosystem.

»

ROSE COMMUNITY FOUNDATION

How We Support You and Your Clients

Personalized Philanthropic Guidance

We collaborate with you to help clients structure charitable gifts through wills, trusts, retirement accounts, and more — always honoring your advisory role.

Donor-Advised Funds, Simplified

Offer your clients a flexible, tax-efficient giving vehicle that's easy to establish and manage — and meaningful for years to come.

Legacy Planning

From establishing charitable legacies to creating succession plans or named endowments, we ensure your clients' legacy of giving continues beyond their lifetime.

Complex Assets, Made Straightforward

We're equipped to accept and manage gifts of real estate, cryptocurrency, business interests, privately held stock, life insurance, and more.

Multigenerational Giving

Our team facilitates family conversations to help clients pass down both assets and values — strengthening family ties through shared purpose.

Let Us Help Your Clients Give with Impact

You bring the financial insight. We bring the philanthropic expertise. Together, we help your clients make a difference — in ways that are strategic, effective, and deeply meaningful.

This information is not intended as legal or tax advice. Donors should contact their financial and legal advisors prior to making a gift or legacy commitment.

Contact Us

Let's talk about how we can support your clients — and your practice.



Judy Altenberg
Chief Philanthropy Officer
jaltenberg@rcfdenver.org
303.398.7407



Sarah James
Director of Donor Funds & Gift Planning
sjames@rcfdenver.org
303.398.7416