



WF Fund vs. Private Foundation

Income Tax Deductions	WF Fund	Private Foundation
	Percentage Limitations (Adjusted Gross Income)	
Cash gifts	60%	30%
Capital gain property	30%	20%
Carry-over available	✓	✓
	(Amount deductible subject to % limitations)	
Capital gain publicly traded stock	Fair Market Value	Fair Market Value
Other capital gain property	Fair Market Value	Basis

Accounting & Tax Preparation	WF Fund	Private Foundation
Separate tax return required	X	✓
Separate account statements required	X	✓
Tax returns open to public inspection	✓ (not donor lists)	✓

Operating Rules of Internal Revenue Code	WF Fund	Private Foundation
Excise tax on investment income	X	✓
Minimum payout requirement	X	✓
Restrictions on “self-dealing” or donor benefit	✓	✓
Restrictions on holding interests in business enterprise	✓	✓
Prohibition against grants to support lobbying	X (Some restrictions)	✓
Application of expenditure responsibility procedures for grants to organizations that are not public charities	✓	✓
IRS pre-approval of scholarship and research grant procedures	✓	✓
Possibility of advisory role in grantmaking	✓	✓
Possibility of legal control by donor in grantmaking	X	✓

Investment & Administration	WF Fund	Private Foundation
Participate in community foundation’s investment pools	✓	X
Possibility of donor control over investments	X	✓
Access to advice and counsel of professional staff	✓	Only if staff is employed or retained to consult
Possibility of grantmaking to out-of-state charities	✓ (in most cases)	✓