

A World of Philanthropic Opportunity: A Global Perspective on Giving

By **Betsy Brill***

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Betsy Brill discusses opportunities available in international philanthropy and summarizes requirements necessary to incorporate these efforts with tax efficiency.

The global agenda has never been so varied, so pressing, or so complex. It demands of the international community new approaches, new resources, and new commitments of political will.

—Kofi Annan, United Nations Secretary General

We live in a world that is simultaneously expanding and contracting. The increase in human population and the global marketplace, the interconnection brought about by the pervasive access to technology, the emergence of new and growing economies and catastrophic events such as 9/11 are redrawing the map of alliances and forging new economic, political and social relationships among people and nations.

With this global interdependence comes a new interpretation of philanthropy, one that reflects and encompasses a much wider sphere of pressing social issues and changing geographic boundaries of wealth and power. Philanthropy has always been a bedrock tradition in America, transcending social, economic and ethnic boundaries; however, for the most part, giving has been focused on societal or cultural issues within the United States. Global philanthropy has not been as much of a priority because the issues and problems elsewhere in the world did not seem to affect Americans to a significant enough degree. Recent events, including the tragedy of September 11, 2001, demonstrated how small the world really is.

Today, anti-American sentiment may be growing around

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the world but, at the same time, this is creating an important opportunity for individuals, families and corporations to contribute, in some measure, to resolving the growing divisions by helping to build, support and expand open societies around the world. In other words, by incorporating global philanthropy into their charitable giving.

So why is this important to you, as financial and legal advisors? Because the changing global social, political and economic boundaries provide a unique opportunity for your clients to make a difference outside our borders in ways that will impact and benefit them here at home. There is now *a world of philanthropic opportunity* that you can introduce your clients to as they begin to design or review their charitable giving strategies.

This article provides an overview of the current trends and emerging infrastructure in the field of international philanthropy. It describes how you can assist your clients in exploring this opportunity and reviews some of the resources that are now available.

Why should we care what happens elsewhere in the world?

Here are a few compelling facts:

Poverty¹

- Three billion people, nearly half of the world's population, struggle to live on less than \$2 a day.
- 854 million of the world's adults are illiterate (nearly two-thirds of which are women).
- Every day, more than 30,000 children in the world die of preventable diseases.
- At the current rate, it would take more than 130 years to rid the world of hunger.

Violence Against Women

- Each year, roughly two million girls between the ages of five and 15 are trafficked, sold or coerced into prostitution.²
- At least one out of every three women around the world has been beaten, coerced into sex or otherwise abused in her lifetime—with the abuser usually someone known to her.³

AIDS/HIV

- The global HIV/AIDS epidemic killed more than three million people in 2003, and an estimated five million acquired the human immunodeficiency virus (HIV), bringing to 40 million the number of people living with the virus around the world.⁴
- AIDS has already orphaned more than one million African children, half of whom are between the ages of 10 and 14.⁵

Environmental Degradation⁶

- Each day, 5,500 children die from diseases linked to polluted food, air and water.
- Human activity endangers nearly 60 percent of the world's coral reefs.
- Bird extinctions are running at some 50 times the natural rate due to habitat loss and other consequences of human activity.
- Tropical forests are falling at a rate of just under one percent per year or 29 hectares per minute.

Income and Wealth Inequality⁷

- The combined wealth of the world's three richest individuals is greater than the total wealth of the world's 48 poorest countries.
- During the 1990s, the number of people in Sub-Saharan Africa rose to 300 million.

- The world's largest 200 corporations have combined sales that are greater than a quarter of the economic activity of the planet.
- Of the 100 largest economies in the world, only 49 are countries, while 51 are private corporations.

At the beginning of 2000, the UN, in acknowledgement of the growing problems around the world, drafted a set of Millennium Development Goals that all 191 United Nations members have pledged to meet by the year 2015. "The Millennium Development Goals are a tool for: mobilizing support and holding governments accountable. They are a test for developing countries which must undertake political and economic reforms, and liberate the creative energies of their people, and for developed countries which must support these steps with new aid commitments, debt relief and equitable trading rules. They are ultimately a call to which every one of us can and should respond."⁸

Iftekar Zaman, Executive Director, Bangladesh Freedom Foundation and Chair of the Council on Foundations International Committee recently echoed the call to action: "With some of the most fundamental values of democracy, pluralism and internationalism under severe strain, the underlying struggles for poverty reduction, social justice, peace building and human dignity have never been more urgent."⁹

Background and Current Trends

A recent report, released in October 2003 by The Foundation Center, stated that, "international

giving increased 131% between 1998 and 2001. Largely the Gates Foundation triggered the jump in the percentages. As a result, while nearly all funding areas benefited from a rise in giving, global health programs posted the largest gains.¹⁰ “The nation’s nearly 62,000 grantmaking foundations provided an estimated \$3.1 billion for cross-border and U.S.-based international programs in 2002—nearly double the \$1.6 billion estimated for 1998.” International giving climbed 76% over this period, far exceeding the 41% gain in overall giving.¹¹

In 2001, 636 funders awarded international grants, a 10-percent increase since 1998 and a 53-percent increase since 1990. Overseas giving primarily benefited global programs, Africa, Asia and Latin America.¹²

Despite the trends reported by The Foundation Center, in relative terms, support for international organizations and issues remain astoundingly low. Of the 220 billion U.S. philanthropic dollars given in 2002 just over \$4.5 billion (under two percent) supported international causes.

The Foundation Center Report discussed the outlook for international funding in the future and observed, “the heightened focus on global peace and security may make the case for international grantmaking more compelling and spur greater interest in the field. Ongoing campaigns to combat infectious diseases worldwide, to preserve the global environment, and reduce global poverty will serve to attract new funding.”¹³

Dot Ridings, President and CEO of the Council on Foundations noted that, “more and more foundations are rolling up their sleeves to address tough global issues from

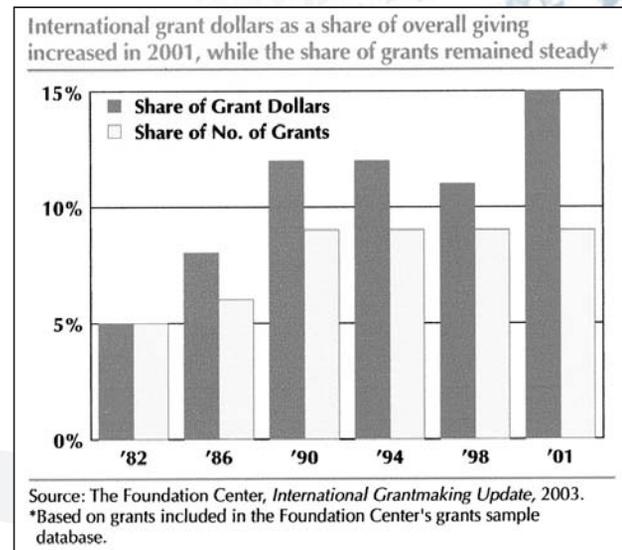
AIDS to environmental challenges to conflict resolution.”¹⁴ In fact, The Council on Foundations recently surveyed their Affinity Groups (associations of foundations with common priorities and interests) and found that 43 percent of the groups are involved in international grantmaking or international issues and many are currently developing activities and programs. Globalization, universal human rights, global environmental issues, global justice, international advocacy, fighting AIDS and HIV globally and other international issues are now permanent topics at affinity group conference, publications, Web sites and meetings.¹⁵

Paula Johnson, Research Fellow at the Global Equity Initiative at the Kennedy School of Government at Harvard noted at the recent launch event of the Chicago Global Donors Network in Chicago that, “the good news is that there are observable—if not quantifiable trends in international giving that suggest growing interest and engagement.” She illustrated this growing interest by highlighting what she calls “new actors” in international philanthropy. They include prominent individuals such as George Soros, Ted Turner and Bill Gates who have all brought heightened visibility to global concerns and set examples for emerging donors. There are also an increasing number of diaspora philanthropists who are, through informal and formal mechanisms, giving

back to their countries of origin. Johnson also noted that there are a growing number of organizations that are supporting these efforts, from the Brazil Foundation to the American India Foundation to the Zacateca Foundation in Chicago. Zacateca leverages over one million donors who are supporting infrastructure development in Mexico (roads, schools, bridges and water and electric systems, etc.) and whose contributions are matched, three to one, by the Mexican government.

Johnson highlighted the fact that new private and family foundations are emerging with either an exclusive focus on international concerns or as a part of their overall giving strategy. According to WORTH magazine’s account of the 25 most generous young philanthropists in 2002, almost half of those highlighted supported global issues and organizations. Finally, Johnson pointed out that the growth of philanthropy around the world provides a new opportunity for collaboration and partnership between donors in the United States and those in other countries.¹⁶

Chart 1



This speaks directly to another development worth noting: “the global associational revolution.” Lester Salamon, in a chapter of the book entitled *GLOBAL CIVIL SOCIETY: DIMENSIONS OF THE NONPROFIT SECTOR*, discusses the increasing attention that the nonprofit sector has received in recent years because of the “widespread crisis of the state that has been underway for two decades or more in virtually every part of the world, a crisis that has manifested itself in a serious questioning of traditional social welfare policies in much of the developed North, in disappointments over the progress of state-led development in significant parts of the developing South, in the collapse of the experiment in state socialism in Central and Eastern Europe, and in concerns about the environmental degradation that continue to threaten human health and safety everywhere.” Salamon goes on to say that “because of their unique position [nonprofit organizations] outside of the market and the state, their generally smaller scale, their connections to citizens, their flexibility, their capacity to tap private initiative in support of public purposes, and their newly rediscovered contributions to building social capital, civil society organizations have surfaced as strategically important participants in this search for a middle way between sole reliance on the market and sole reliance on the state that now seems to be increasingly underway.”

The findings of the Salamon study suggest that in 1995, the nonprofit sector in 22 countries (see Chart 4) represented a \$1.1 trillion industry—even excluding religious congregations—with more employees

than the largest private firms. To put this into context, the nonprofit sector within these 22 countries represents the world’s eighth largest economy.”¹⁷

Talking to Your Clients—Making the Case for Global Philanthropy

According to the International Program at the Council on Foundations, there are three simple reasons to make International Grantmaking a priority:

1. International grantmaking is easier than you think.
2. Global problems affect the United States.
3. A small grant can make a large impact.¹⁸

What exactly is global philanthropy? It refers to the investment of private dollars without regard for national borders. Often it manifests in the form of social investments that address issues of world poverty and social injustice. While a large number of these investments support U.S.-based organizations working internationally, many are now supporting nongovernmental organizations in other countries.

There are a variety of reasons why your clients may be drawn to global philanthropy or why you might consider apprising them of this opportunity. Many donors respond to a world crisis like the war in Iraq, the post-9/11 struggle to rebuild Afghanistan, the violence and ethnic struggles and military abuse in Kosovo and Burma and the natural disasters that occur on our planet. Many are motivated to give overseas because of the vast resource inequities in the world, and others

believe that global interdependence demands global social responsibility. Often, people travel overseas and learn about the needs of a particular community and choose to get involved. The personal connection that can be found with individuals in other countries and cultural contexts can be very fulfilling and create a real opportunity to learn about other parts of the world and the context within which others live and work.

In certain instances, donors may need to be guided to see the connections between international issues and their own giving strategies and interests. For example, many donors who are interested in supporting environmental issues understand that the environment knows no borders, that it only knows (air and water) currents, but they do not know of organizations or efforts outside the United States that address these issues. Those who support public health understand that health is a global issue, from SARS to AIDS, and that everything in our world has gone global from trade to disease to communication. But often these donors do not understand how giving to international efforts can have an impact at home. Many donors are

The United Nations Millennium Development Goals

1.	Eradicate extreme poverty and hunger
2.	Promote gender equality and empower women
3.	Reduce child mortality
4.	Improve maternal health
5.	Combat HIV/AIDS, malaria and other diseases
6.	Ensure environmental sustainability
7.	Develop a global partnership for development

Source: United Nations, UN Millennium Development Goals at <http://www.un.org/millenniumgoals/>.

beginning to understand that to prevent terrorist attacks here and abroad and to diminish the power of terrorist organizations, we must address global poverty, one of the key causes of violence. They often only need a better understanding of how to assist in the effort to reduce poverty.

Greater respect for human rights, along with democracy and social justice, will in the long term be the most effective prophylactic against terror.

—Kofi Annan¹⁹

Whatever the motivation, the palette of issues, needs and critical concerns has expanded, eradicating borders and demanding philanthropic attention from a wider, more diverse group of participants. An impetus for giving internationally is that “A little goes a long way.” Modest grants can really have a large impact. For example, a young person can attend the University for one year in Nigeria for \$500, and a home school for girls in Afghanistan can be established and operate for one year with as little as a \$500 investment.

Effective Global Philanthropy at Work

There is actually not much difference between global philanthropy and domestic philanthropy. The same basic strategy for launching a grantmaking effort holds true:

1. Identify your focus.
2. Create a strategy.
3. Determine your methods or conduits.

The key is to have your clients focus on work *that governments*

do not fund such as human rights, advocacy and strengthening civil and open societies in “closed societies.” They should also be encouraged to identify organizations that have “their ear to the ground,” whether they are based in the United States or in other countries around the world. There are some important things to keep in mind when providing support for international organizations such as starting with small grants, taking risks and expecting that not every grant will be deemed “successful.” It is also wise to provide institutional support to strengthen grassroots organizations and to consider allocating grants for capacity building to improve organizational management and skills. Building relationships based on mutual trust will take a donor a long way in securing his/her philanthropic goals.

13 Things You Can [Encourage Your Clients to] Do to Get Started²⁰

1. Fund grassroots organizations overseas.
2. Serve on the board of directors of an organization supporting international projects and causes.
3. Find out what local groups in your community are working on international issues.
4. Align your foundation’s investments with your international focus by adopting program-related investment as a strategy.
5. Travel to potential sites for grantmaking activities overseas.
6. Support programs to educate citizens on international issues.
7. Fund immigration, citizenship or refugee research and activism.

8. Learn from other donors about projects in program areas of joint interest.
9. Promote exchanges between representatives of industrialized and nonindustrialized countries.
10. Support U.S.-based organizations that are active overseas.
11. Attend international meetings and conferences focused on global issues.
12. Commission and promote performances of works of art, music, dance and literature where culture is at risk of being lost.
13. Network with other donors by joining a donor organization and attending their meetings.

Know the Landscape: Overcoming Legal and Tax Concerns

As already noted, a lot has changed since September 11, 2001, in terms of global philanthropy. There are new tax and legal issues and rules that have been initiated relative to funding organizations or issues outside the United States. Grantmakers who wish to make international grants must now comply with not only the U.S. tax rules but also with various Treasury anti-terrorism compliance measures. These perceived “barriers” can be overcome easily if your clients understand certain legal and tax requirements.

One fallacy many advisors perpetuate is that clients can only provide grants to U.S. 501(c)(3) organizations, when the truth is that foundations are *not* required by federal tax law to limit their chari-

Chart 2

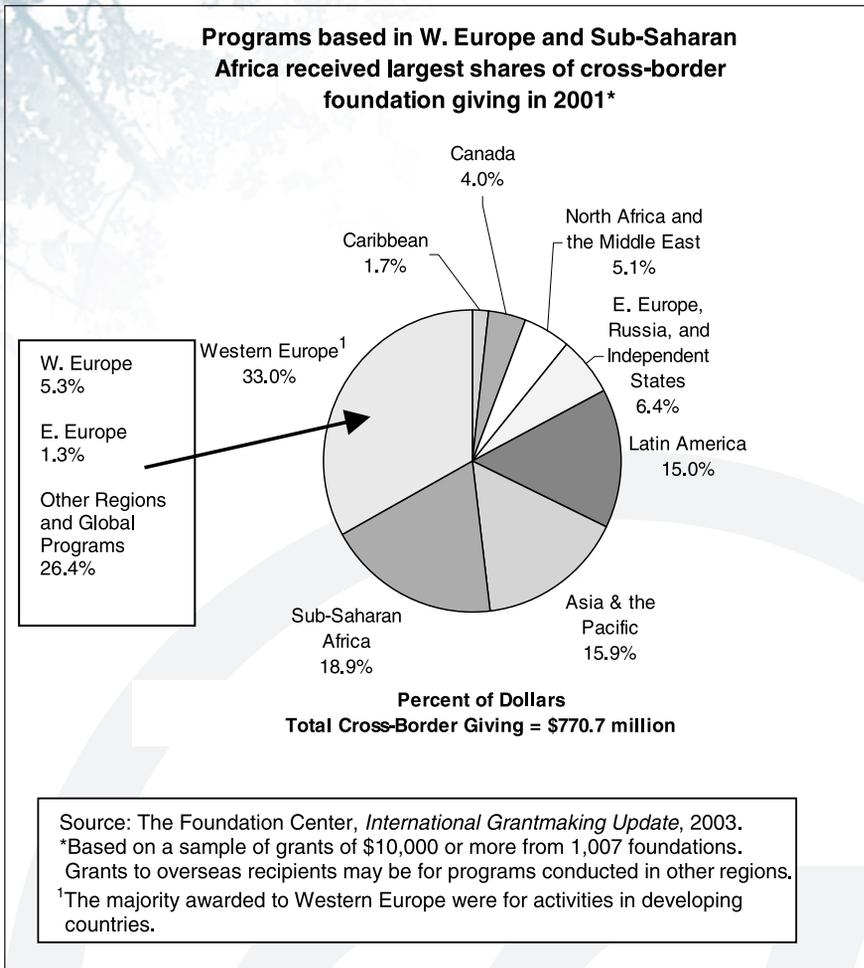


table grants to U.S. organizations. Unfortunately, and unnecessarily, too many governing documents contain such a limitation (for example, limiting grants to organizations described in Code Sec. 170(c)(2)(A). Robert Goldman is a principal in the Boston law firm of Goulston & Stoors, which has a practice specifically devoted to addressing philanthropic issues and working with clients to advise on their philanthropic efforts. Goldman prefers to give his clients the opportunity to grant globally by simply limiting the purposes of any grant to the broad charitable purposes of Code Sec. 501(c)(3), and not requiring that the grantee be an organization certified under Code Sec. 501(c)(3)—because such certification is *not* required!

Recently, the author asked Goldman to provide some legal “ground rules” for international philanthropy. The following is excerpted from that conversation and a report he provided at the first Chicago Global Donors Network conference in October 2003, entitled *U.S. Individuals and Foundations Funding Globally, Tax and Legal Concerns*.²¹

Income Tax Deduction for Gifts to U.S.-Based Charitable Organizations. Individuals receive an income tax charitable deduction only for contributions to charitable organizations that are U.S.-based (incorporated or organized under the laws of a U.S. state).

Example. Donors receive an income tax deduction for contributions to U.S.-based

Oxfam-America, World Education, and International AIDS Trust, even though a charitable purpose of these organizations is to conduct charitable activities outside the United States.

“Friends of Foreign Charity” Organizations Assist in Achieving Income Tax Deduction. Global charitable causes that want to raise tax-deductible contributions must arrange for a U.S.-based organization to receive the contributions. Internal Revenue Service rulings hold that contributions to a U.S.-based organization that grants its funds for charitable purposes outside the United States will be deductible only if the U.S.-based organization has total control over the use of the contributions and is not required to “pass through” the contributions upon terms dictated by donors or by any non-U.S. organization. Further, the U.S.-based organization may be affiliated with a non-U.S. organization and may even limit the funding requests that it will entertain to only those from its non-U.S. affiliate, but in all cases the U.S.-based organization must have full control over its funds and have full discretion to approve or deny such requests.

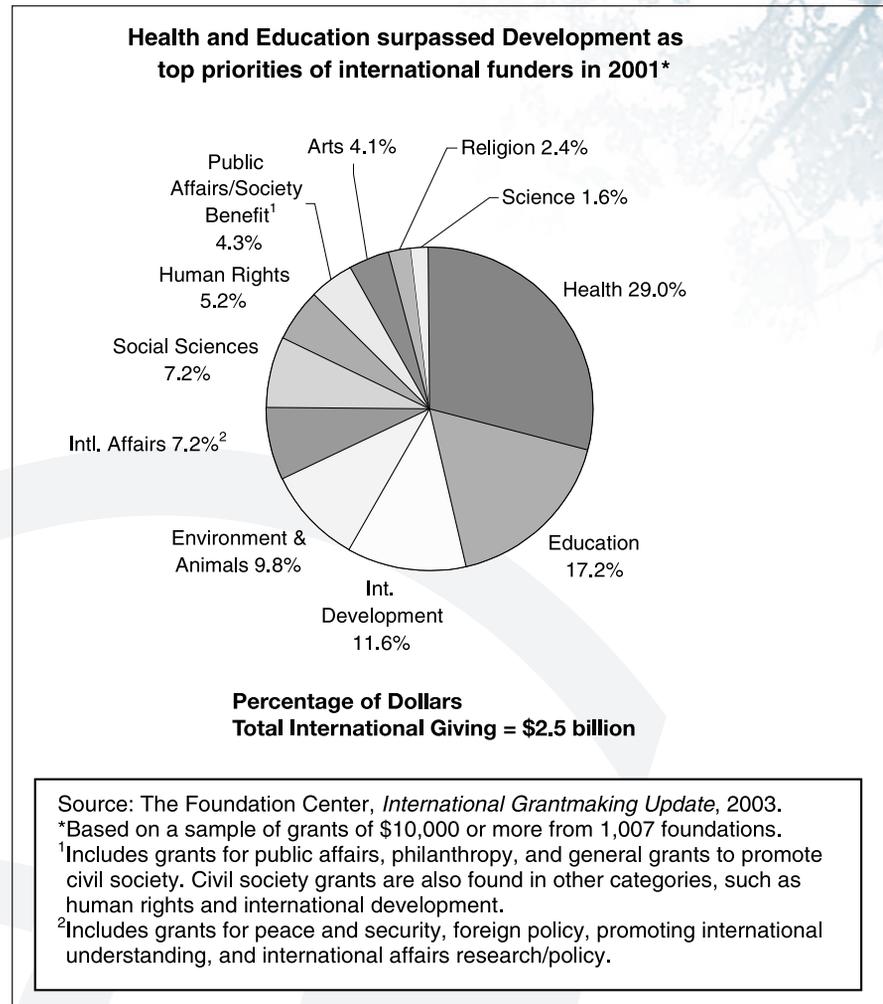
Example. Friends of Yemin Orde (FYO) is a U.S.-based organization sufficiently independent from the Israeli orphanage that it supports such that contributions to it are deductible. The board of directors of FYO is independent of the foreign charitable organization that it supports (only one director is a representative of the foreign organization). FYO accepts requests from the foreign organization for both operating

funds and specific projects, approves or rejects such requests, and then raises funds to meet the commitments that it has made. Donors who desire to restrict a gift to a project that has not yet been approved by the FYO board are told that the board must first consider the project and approve it.

This issue suggests that a donor contributing to a private foundation controlled by himself or his family might be at risk for not achieving a charitable deduction if the foundation in turn grants the funds to a non-U.S. organization. A best practice would be that funds donated to a private foundation should not immediately be passed through to a foreign organization, and certainly there should not be a consistent pattern of such activity. If possible, consider funding from foundation income and gains. Where a foundation finds itself in a position of re-granting a recent contribution to a non-U.S. organization, it might first choose to populate its decision-making board with nonfamily members who clearly are not benefiting from the income tax deduction.

Private Foundation Governing Documents Should Permit Global Funding. Tax laws do not prohibit private foundations from supporting foreign charitable organizations. However, many foundation governing documents (including those drafted by major law firms) limit the class of permissible grantees to a boilerplate definition of “charitable organizations described in IRC Section 170(c)(2)” which is unnecessarily narrow and which precludes grants to non-U.S. organizations. In some cases the governing document can be amended if the

Chart 3



foundation would like the authority to consider global funding.

Five-Percent Minimum Distribution Test for Foundations.

Foundations are able to count global grants toward satisfying their five-percent minimum distribution requirement in many cases, including grants to U.S.-based public charities, to units of foreign governments (specifically limited for a charitable purpose), to foreign charities that are equivalent to U.S.-based public charities or operating foundations (as determined by an affidavit of the foreign charity or an opinion of its counsel or the foundation's counsel), to foreign charities that are equivalent to U.S.-based

private foundations (similarly determined) so long as the foreign charity further makes a qualifying distribution of the grant within one year, and even to foreign organizations that are not charities at all so long as the grant is specifically limited for a charitable purpose.

Taxable Expenditure Penalty on Private Foundations that Grant to Foreign Charities. Although the tax code provides a penalty tax on private foundations that grant to organizations which are not public charities, such penalty will not apply if the foundation grants to a foreign charity that is equivalent to a U.S. public charity (as determined by an affidavit of the foreign charity or an opinion of its counsel or the foun-

Chart 4

If the nonprofit sector were a country ...

Country	GDP (trillion \$)
U.S.	\$7.2
Japan	5.1
China	2.8
Germany	2.2
France	1.5
U.K.	1.1
Italy	1.1
Nonprofit Expenditures (22 countries)	1.1
Brazil	0.7
Russia	0.7
Spain	0.6
Canada	0.5

Source: Lester M. Salamon, Helmut K. Anheier, and Associates, *Global Civil Society: Dimensions of the Nonprofit Sector*, Baltimore, MD: Johns Hopkins Center for Civil Society Studies, 1999.

dation's counsel). As an alternative, a private foundation granting globally to any organization (whether or not the equivalent of a U.S. public charity) may avoid the penalty tax if it conducts monitoring known as expenditure responsibility.

Equivalency Determination. First the foreign charity has to prove it is equivalent to a U.S. charity, including that its governing documents or law require it to operate solely for charitable purposes and prohibit it from conducting any substantial lobbying, any political campaign activity, and any private benefit activity. Consider providing the foreign charity with an amendment to its governing instrument that sets forth all these elements. Next, the foreign charity has to prove it is equivalent to a *public* charity. This is automatic for religious organizations, hospitals and schools, but otherwise must be proven with historic financial data showing substantial public support. Foreign schools further have to show that they have adopted and abide by a nondiscrimination policy. Not surprisingly, many foundations that grant to foreign charities opt for the alternative of expenditure responsibility.

Expenditure Responsibility. Many inexperienced foundations unnecessarily fear the unknown of this monitoring exercise. The expenditure responsibility requirements are generally no more onerous than the oversight that the foundation might prudently conduct with respect to any of its important grants, global or domestic. The requirements are:

- Conduct a *pre-grant inquiry*—is the proposed grantee capable of fulfilling the charitable purposes of the grant?
- Have a *written gift agreement* identifying a specific charitable purpose or project, and which includes: the grantee's promise to repay any funds not used for the agreed-upon charitable purpose; a requirement that the grantee submit annual reports; a requirement that the grantee's books and records be available to the foundation; and a prohibition on using funds for noncharitable purposes. The above promises can be termed in substantially equivalent language if necessary under the applicable non-U.S. law or custom (as determined in an affidavit or in opinion of counsel).
- Actually receive the *grantee's reports*, which should set forth how the funds were used, how the grantee complied with the agreement, and what progress was made toward achieving the charitable purposes.
- If the grantee is not at least an equivalent to a charity, then it must maintain grant funds in a *segregated fund* and separately account for such funds.
- Report expenditure responsibility grants to the IRS on annual Form 990PF.

Foundations Should Understand Nontax Legal Limitations

on Global Funding. The Treasury maintains a list of countries in which it is illegal to conduct business or even make charitable grants. See www.treas.gov/ofac. The voluntary Treasury guidelines can be found on this site as well.

Beyond Our Borders: Opportunities for Engagement

There are a number of ways in which foundations and individual donors can participate in international grantmaking. The three most common approaches are:

- direct cross-border grantmaking;
- grantmaking through intermediaries; and
- re-granting to U.S.-based organizations working internationally.

Direct Cross-Border Grantmaking

A grant made to an overseas group is perhaps the most challenging approach to international grantmaking but the obstacles are, as pointed out by Robert Goldman, not insurmountable. Grantmakers Without Borders points out in their international grantmaking resource packet²² that the administrative costs may be higher but these costs are outweighed by the fact that very small grants can go a long way in the developing world. In order to receive a tax deduction for gifts to overseas organizations, you must be a private foundation although many donors make charitable gifts to overseas groups and just forego the tax deduction to enjoy the high impact of small gifts. The legal and tax considerations involved

with direct gifts to overseas organizations were described in the previous section entitled “Know the Landscape: Overcoming Legal and Tax Concerns.”

U.S.-Based 501(c)(3) Organizations Operating in Other Countries

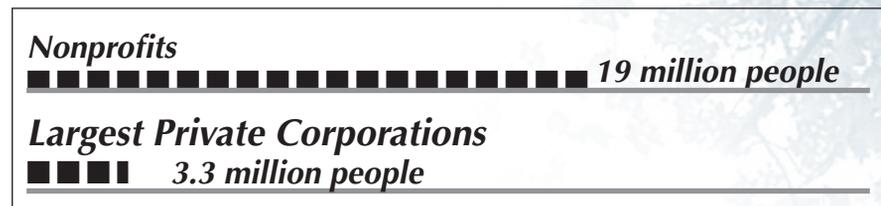
If a donor wants to support an overseas organization, a “friends of organization” is a way of doing so. These organizations have established themselves as 501(c)(3) entities most often to provide a means through which U.S. donors can support their operations overseas. Most of the small nonprofits outside of the United States do not have a “friends of organization” established in the United States, but there are a growing number of hospitals, universities and larger overseas institutions that do. In addition, there are a large number of international organizations based in the United States that conduct their activities on the ground in other countries. For example, organizations such as CARE, Amnesty International, Shared Interest and the Population Council work on issues that span from services in refugee camps to human rights campaigns and legal support, to small loans for micro-enterprise development and research and direct services on issues related to reproductive health.

U.S.- and Internationally-Based Re-Granting Organizations (Intermediaries)

There are a growing number of U.S.-based organizations whose focus is on providing funding for organizations around the world. They have developed deep expertise in both issue areas and regions of the world and employ appropriate monitoring and evaluation to ensure that their

Chart 5

Employment in Nonprofits vs. Largest Firms (22 countries)



Source: *The Johns Hopkins Comparative Nonprofit Sector Project*

grants are effecting real change on the ground. They range from specific organizations focused on children, the environment, women, Asia, Brazil and India to mention a few, and their role as brokers and intermediaries has proven extremely successful. The following is an initial list of some of the opportunities for donors to pursue if they choose the intermediary strategy to implement their international grantmaking.

- Global Greengrants Fund—www.greengrants.org—The Global Greengrants Fund is a grantmaking intermediary that supports grassroots groups working for environmental justice and sustainability around the world.
- Global Fund for Women—www.globalfundforwomen.org—The Global Fund for Women makes grants to seed, support and strengthen women’s rights groups based outside the United States working to address human rights issues that include: ending gender-based violence and building peace, ensuring economic and environmental justice, advancing health and sexual and reproductive rights, expanding civic and political participation, increasing access to education and fostering social change philanthropy.
- Global Fund for Children—www.globalfundforchildren.org—

org—The Global Fund for Children is a grantmaking intermediary seeking to advance educational opportunities for children in the developing world. Their funding is focused on hazardous child labor, child trafficking and prostitution, the distinctive needs of vulnerable boys and schools and scholarships.

- Charities Aid Foundation America—www.cafonline.org—This is a tax-exempt organization whose purpose is to support, promote and facilitate international charitable giving.
- King Baudouin Foundation United States—www.kbfus.org—This tax-exempt organization seeks to increase understanding between the United States and Europe and facilitates transatlantic philanthropy.
- Asia Foundation—www.give2asia.org—Give2Asia is a tax exempt organization that helps clients fulfill charitable goals in Asia.
- American India Foundation—www.aifoundation.org—The American India Foundation (AIF) is devoted to accelerating social and economic change in India by connecting communities and resources across the United States and India. AIF’s grants are focused on *education* and *livelihood*

projects with a particular emphasis on primary education and women's empowerment.

- Brazil Foundation—www.brazilfoundation.org—Brazil Foundation mobilizes resources and talent to contribute to the improvement of social conditions in Brazil. The Foundation acts as a bridge between the United States and Brazil—capturing donations from individuals and socially responsible corporations in the United States and transferring them to social programs throughout Brazil.
- The Virtual Foundation—www.virtualfoundation.org—This is a unique *online* philanthropy program that supports grassroots initiatives around the world. The focus of the Virtual Foundation is twofold: to encourage private philanthropy among citizens from all walks of life, and to support local projects initiated by nongovernmental organizations (NGOs) in the fields of environment, health and sustainable development.

Helpful Resources

There are a myriad of informative and educational avenues you and your client can explore to broaden your exposure to in-

ternational grantmaking/global philanthropy. Here are just a few that may be helpful:

Organizations and Web sites

- Grantmakers Without Borders, www.gwob.net, is a funders' network striving to foster global justice by promoting international social change philanthropy. Members of this organization include trustees and staff of foundations and grantmaking public charities, individual donors and others from within the philanthropic sector.
- The International Programs department of the Council on Foundations in cooperation with the International Center for Not-for-Profit Law sponsors a Web site on U.S. international grantmaking: www.usig.org. The Web site features a wide range of links to organizations and information pertinent to legal, administrative, operational and accounting issues facing donors who wish to fund in other countries.
- Global Philanthropy Forum—www.philanthropyforum.org
- Chicago Global Donors Network—cgdn@global-philanthropy.org
- Synergos Philanthropy Circle—www.synergos.org

- European Foundation Center—www.efc.be
- International Funders for Indigenous People—www.firstpeoples.org/ifip.htm
- International Human Rights Funders Group—www.hrfunders.org
- Action Without Borders, Idealist.org—www.idealist.org

Publications

- Global Giving Matters (Synergos)—www.synergos.org/globalgivingmatters/
- Brief Guides to Philanthropy—Global Philanthropy Partnership—www.global-philanthropy.org
 - Philanthropy for Climate Protection
 - Philanthropy for Forests
 - Philanthropy for Global Digital Opportunity
 - Philanthropy for HIV/AIDS
 - Philanthropy for Human Rights
 - Philanthropy for Land Mines
 - Philanthropy for Local Development
 - Philanthropy for Refugees
 - Philanthropy for Malaria
 - Council on Foundations
- Beyond Our Borders: A Guide to Making Grants Outside the United States
- International Dateline—a quarterly publication of the Council on Foundations

ENDNOTES

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¹ Carolyn Deere, *Globalization and Grantmakers: Demystifying the Issues, Actors and Funding Opportunities*, FUNDERS NETWORK ON TRADE AND GLOBALIZATION, Aug. 2003, at 5.

² United Nations Development Fund for Women, *Not a Minute More: November 25—International Day of the Elimination of Violence Against Women*. Report can be assessed online at www.unifem.org/campaigns/november25/FactsFigures.pdf.

³ *Supra* note 2.

⁴ Joint United Nation Program on HIV/AIDS, UNAIDS at www.unaids.org/EN/Resources/Publications/Corporate+publications/AIDS+epidemic+update+-+December+2003.asp

⁵ UNICEF, *Africa's Orphan Crisis: Worst is Yet to Come*, Johannesburg/Geneva, Nov. 26, 2003.

⁶ *Supra* note 1.

⁷ *Supra* note 1.

⁸ United Nations, Press Release: Millennium Development Goals Ambitions but Technically Feasible in a Short Time, June 11, 2003.

⁹ Iftekar Zaman, Notes from the Chair, *International Dateline*, COUNCIL ON FOUNDATIONS, Third Quarter 2003, at 1.

ENDNOTES

- ¹⁰ Loren Renz and Josephina Atienza, *The Foundation Center's International Grantmaking Update*, prepared in cooperation with the Council on Foundations, Oct. 2003.
- ¹¹ *Id.*
- ¹² *Id.*
- ¹³ The Foundation Center, Press Release: International Giving More than Doubled From 1998 to 2001, New Report Shows, Oct. 14, 2003.
- ¹⁴ *Id.*
- ¹⁵ Andres Corral, *Study Reveals 43 Percent of Council Affinity Groups Are Involved in International Grantmaking*, *International Dateline*, COUNCIL ON FOUNDATIONS, Third Quarter 2003, at 5.
- ¹⁶ Paula Johnson, Taken from Remarks at the Chicago Global Donors Network Conference on International Giving speech entitled *Trends in International Giving*, Oct. 2, 2003.
- ¹⁷ Lester M. Salamon, Helmut K. Anheier, and Associates, *Global Civil Society: Dimensions of the Nonprofit Sector*, Baltimore, Maryland: Johns Hopkins Center for Civil Society Studies, 1999, at 8–9.
- ¹⁸ Council on Foundations, *International Grantmaking: Ten Tips for Effective International Grantmaking*, 1997, www.fdcncenter.org.
- ¹⁹ United Nations, Press Release, Secretary-General Calls for "Unity of Purpose Around a Common Security Agenda," Aug. 9, 2003.
- ²⁰ Adapted from Barbara Laney Boyd and Susan Cornell Wilkes, *Family Foundations and International Grantmaking: Tips on How to Begin*, Council on Foundations, 1998.
- ²¹ Robert P. Goldman, Esq., *U.S. Individuals and Foundations Funding Globally: Tax and Legal Concerns*, Philanthropic Advisors, LLC: 2003.
- ²² Grantmakers Without Borders, *International Grantmaking Resource Packet*, at www.gwob.net/pdf/resourcespacket.pdf.

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