

One Big Beautiful Bill Act: Impact on charitable planning



Introducing Fidelity Charitable®

In 2024:

Largest
grantmaker
in the
United States

352,000
donors

217,000
charitable accounts

213,000
nonprofits

Discussing philanthropy is good for business

Advisors who engage clients in charitable planning have on average:



20%
more growth



1.5x
AUM

One Big Beautiful Bill Act summary

One Big Beautiful Bill Act (OBBBA) summary

The OBBBA has a net cost of \$3.4 trillion (decreases in direct spending of \$1.1 trillion and a decrease in revenues of \$4.5 trillion through tax policy changes).



Defense spending



Immigration



Medicare/Medicaid/ACA



Tax policy

One Big Beautiful Bill Act

Changes to individual tax provisions

Tax Cuts and Jobs Act (2017)		One Big Beautiful Bill Act (2025)	
<i>Marginal tax rates</i>	37% top rate	►	Permanently extended
<i>Standard deduction</i>	\$12,400 (single) / \$24,800 (married)	▲	\$15,750 (single) / \$31,500 (married)
<i>Child tax credit</i>	\$2,000/child	▲	\$2,200/child (beginning in tax year 2025, permanently indexed for inflation starting in 2026)
<i>Personal exemption</i>	Eliminated	✖	Permanently repealed
<i>State and local tax (SALT) deduction</i>	Capped at \$10,000	▲	Increased cap from 2025–2029 to \$40,000, with phase out for incomes above \$500,000; cap reverts to \$10,000 in 2030

One Big Beautiful Bill Act

Changes to individual tax provisions

Tax Cuts and Jobs Act (2017)

One Big Beautiful Bill Act (2025)

Estate and gift tax exemption

\$13.92 million per individual in 2025



Permanently increases to \$15 million, indexed for inflation, starting in the 2026 tax year

Mortgage interest Deduction

Interest on mortgage and home equity debt up to \$750,000



Permanently extended

Qualified business income deduction (Section 199A)

Up to 20% for pass-through business income



Permanently extended

Trump campaign tax promises

Did not exist



No tax on tips (from 2025–2028, with \$25,000 limit and phase out for those making > \$150,000)



No tax on overtime (from 2025–2028, with \$12,500 limit and phase out for those making > \$150,000)



New \$6,000 deduction for seniors (subject to phase out for those making more than \$75,000)

One Big Beautiful Bill Act

Changes to the charitable sector

Tax Cuts and Jobs Act (2017)

One Big Beautiful Bill Act (2025)

Excise tax on investment income of private colleges and universities

1.4% tax on net investment income for private colleges with ≥500 students and ≥\$500K assets/student

Tiered tax for colleges with ≥3,000 students and ≥\$500K in student-adjusted endowment:

- 1.4%: \$500K–\$750K
- 4%: \$750K–\$2M
- 8%: >\$2M

Executive compensation for tax-exempt orgs

Tax on top 5 earners making >\$1M

Tax on any employee earning >\$1M, regardless of role or employment status (effective 2026)

One Big Beautiful Bill Act

Changes to the charitable sector

Tax Cuts and Jobs Act (2017)		One Big Beautiful Bill Act (2025)
<i>Individual charitable deduction</i>	Itemizers can deduct contributions, subject to limits by type.	1. Only contributions >0.5% of base deductible (2026) 2. 60% of adjusted gross income cash contributions limit made permanent 3. Non-itemizers can deduct up to \$1,000/\$2,000 (2026)
<i>Corporate charitable deduction</i>	Deductions allowed with type-based limits.	New 1% minimum threshold for deductions (2026)

Notable OBBB provision potentially impacting the charitable sector:

- **Itemized deduction cap:** 35% cap on total itemized deductions, including charitable contributions

Impact on charitable planning

Understand your clients' giving goals

New to philanthropy

First-time givers

Unfamiliar with the philanthropic landscape



Casual givers

Give when asked
(charity walks, fundraiser events, etc.)



Responders

Moved by events
(natural disasters, etc.)

Giving varies
year to year



Strategic givers

Annual giving plan

Strong nonprofit relationships

Routine granting



Evaluate client portfolios for tax-smart assets



Long-term appreciated securities
(e.g., stocks, mutual funds, bonds)



Complex non-publicly traded assets
(e.g., private business interests, crypto)



Accelerate 2025 gifts



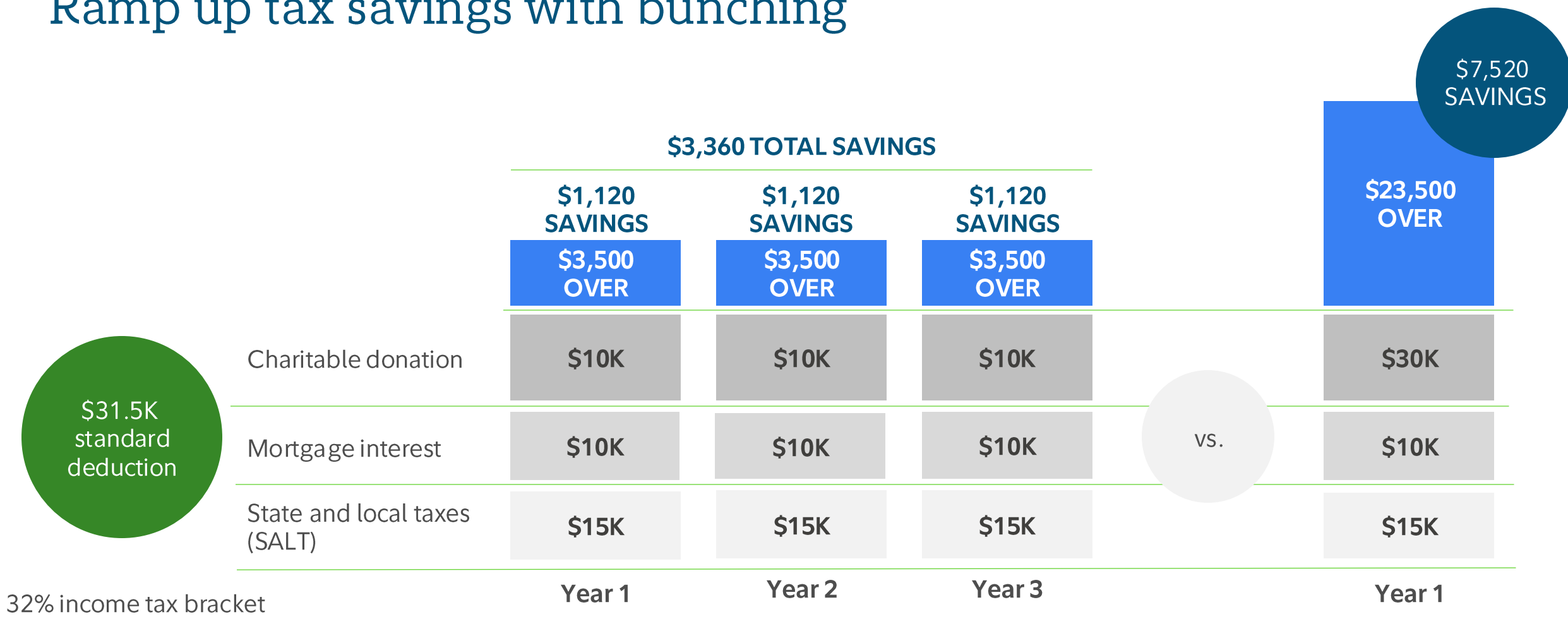
Charitable deductions capped at 35%



New “floor” on charitable deductions (corporate & individual)



Ramp up tax savings with bunching



\$4,160 MORE SAVED

Popular ways to give

Gifts directly
to nonprofits



Donor-advised
funds



Designated
funds



Qualified
charitable
distribution



Field of
interest funds



Planning implications for 2026 and beyond



Estate tax
exemption



Impact of the
SALT deduction

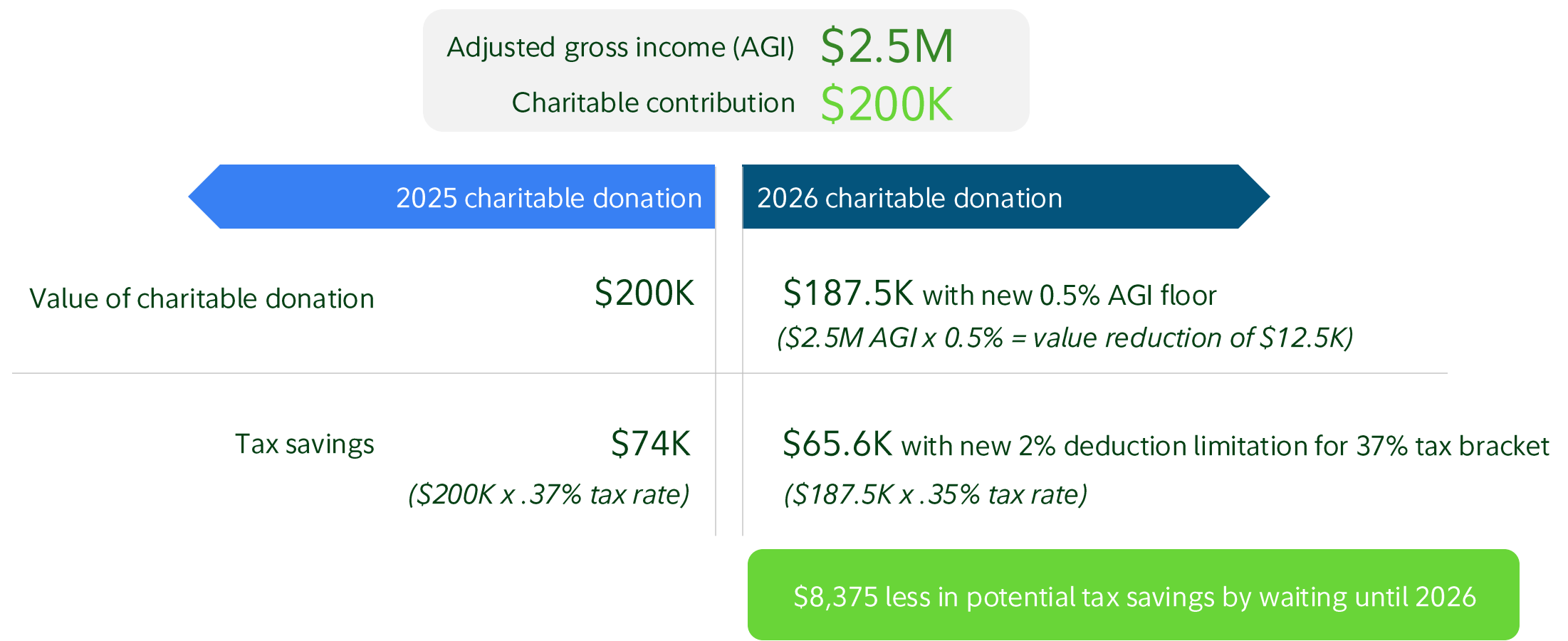


Above-the-line
deduction



Impact of the
new floor

The impact of waiting to give



*In addition to assumptions noted in the chart, this example assumes a married couple, filing jointly, and a fully deductible donation at fair market value to a qualified public charity. It does not take into account state or local taxes, the alternative minimum tax, or limitations on deductions for taxpayers in higher income brackets. The charitable deduction is only available at the federal level if you itemize deductions. Charitable contributions of capital gain property held for more than one year are usually deductible at fair market value. Deductions for capital gain property held for one year or less are usually limited to cost basis. This is a hypothetical example for illustrative purposes only. Results will vary depending on an individual's tax situation.

Disclosures

The tax information provided is general and educational in nature and should not be construed as legal or tax advice. Fidelity Charitable does not provide legal or tax advice. Content provided relates to taxation at the federal level only. Charitable deductions at the federal level are available only if you itemize deductions. Rules and regulations regarding tax deductions for charitable giving vary at the state level, and laws of a specific state or laws relevant to a particular situation may affect the applicability, accuracy, or completeness of the information provided. As a result, Fidelity Charitable cannot guarantee that such information is accurate, complete, or timely. Tax laws and regulations are complex and subject to change, and changes in them may have a material impact on pre- and/or after-tax results. Fidelity Charitable makes no warranties with regard to such information or results obtained by its use. Fidelity Charitable disclaims any liability arising out of your use of, or any tax position taken in reliance on, such information. Always consult an attorney or tax professional regarding your specific legal or tax situation.

Fidelity Charitable is the brand name for the Fidelity Investments® Charitable Gift Fund, an independent public charity with a donor-advised fund program. Various Fidelity companies provide services to Fidelity Charitable. The Fidelity Charitable name and logo and Fidelity are registered service marks of FMR LLC, used by Fidelity Charitable under license.

1219313.2.0

