

DESCRIPTION	CRAT	SCRUT	NICRUT	NIMCRUT	FLIP
Donor	Individual, Corporation, Partnership or Trust	Individual, Corporation, Partnership or Trust	Individual, Corporation, Partnership or Trust	Individual, Corporation, Partnership or Trust	Individual, Corporation, Partnership or Trust
Best Suited for (1)	Clients who need level stream of income, not concerned about inflation	Clients who need income that can vary. May increase to keep up with inflation.	Clients who do not need income now, but may in the future. Most concerned with making maximum gift.	Clients who do not need income now, but may in the future. Most concerned with getting maximum income when needed later.	Clients who want income every year but are funding trust with illiquid assets which may be difficult to sell.
Best Suited for (2)	Older clients that need fixed income stream.	Clients who need current income but want to invest for total return.	Clients who may not need current income and are interested in making the largest gift to charity	Younger clients who may not need current income or are interested in controlling the timing and amount of income received, including deferrals for later years.	Individuals with illiquid assets that would like to take fixed payout when assets are sold
Assets to Contribute	Liquid Assets	Liquid assets or if illiquid, contribute cash to meet annual distributions and fees	Liquid or illiquid assets	Liquid or illiquid assets	Illiquid assets at the time of funding
Trust Term	Life or lives, or fixed term not to exceed 20 years	Life or lives, or fixed term not to exceed 20 years	Life or lives, or fixed term not to exceed 20 years	Life or lives, or fixed term not to exceed 20 years	Life or lives, or fixed term not to exceed 20 years
Income Beneficiary	A taxable entity; Individual (lives in being), Corporation, Partnership, Trust or Charitable Organization (if at least one taxable income beneficiary)	A taxable entity; Individual (lives in being), Corporation, Partnership, Trust or Charitable Organization (if at least one taxable income beneficiary)	A taxable entity; Individual (lives in being), Corporation, Partnership, Trust or Charitable Organization (if at least one taxable income beneficiary)	A taxable entity; Individual (lives in being), Corporation, Partnership, Trust or Charitable Organization (if at least one taxable income beneficiary)	A taxable entity; Individual (lives in being), Corporation, Partnership, Trust or Charitable Organization (if at least one taxable income beneficiary)
Distributions Paid	To at least one taxable beneficiary, based on payout rate of not less than 5%, or more than 50%, of the annual trust value	To at least one taxable beneficiary, based on payout rate of not less than 5%, or more than 50%, of the annual trust value	To at least one taxable beneficiary, based on payout rate of not less than 5%, or more than 50%, of the annual trust value	To at least one taxable beneficiary, based on payout rate of not less than 5%, or more than 50%, of the annual trust value	To at least one taxable beneficiary, based on payout rate of not less than 5%, or more than 50%, of the annual trust value
Payment Frequency	Paid at least annually, but may be quarterly, semiannually, monthly	Paid at least annually, but may be quarterly, semiannually, monthly	Paid at least annually, but may be quarterly, semiannually, monthly	Paid at least annually, but may be quarterly, semiannually, monthly	Paid at least annually, but may be quarterly, semiannually, monthly
Asset Valuation Date	Date of gift only	Date of gift and annually	Date of gift and annually	Date of gift and annually	Date of gift and annually
Distributions Calculated (1)	Initial FMV of asset contributed times payout rate (fixed dollar amount of income for term of trust), fixed amount must be paid	FMV of trust, valued annually, times payout rate (fixed percentage of income for term of trust), variable amount must be paid	FMV of trust, valued annually, times payout rate OR income earned minus expenses (whichever is less), variable amount paid only in earned	FMV of trust, valued annually, times payout rate OR income minus expenses, (whichever is less), variable amount paid only if earned	FMV of trust, valued annually, multiplied by payout rate OR income minus expenses, (whichever is less) UNTIL THE FLIP

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Access Principal	If necessary to satisfy distribution	If necessary to satisfy distribution	May never access principal to satisfy distribution	May never access principal to satisfy distribution	ONLY after the FLIP, when the trust is operating as a SCRUT, may principal be accessed to satisfy distribution
Charitable Remainder Beneficiary	Public Charity, Donor-Advised Fund, Community Foundation, Supporting Organization, or Private Foundation	Public Charity, Donor-Advised Fund, Community Foundation, Supporting Organization, or Private Foundation	Public Charity, Donor-Advised Fund, Community Foundation, Supporting Organization, or Private Foundation	Public Charity, Donor-Advised Fund, Community Foundation, Supporting Organization, or Private Foundation	Public Charity, Donor-Advised Fund, Community Foundation, Supporting Organization, or Private Foundation
Income Tax	Deduction based on present value of future gift to charitable remainder beneficiary	Deduction based on present value of future gift to charitable remainder beneficiary	Deduction based on present value of future gift to charitable remainder beneficiary	Deduction based on present value of future gift to charitable remainder beneficiary	Deduction based on present value of future gift to charitable remainder beneficiary
Estate Tax Considerations	Fully includible (usually fully deductible unless inclusion of non-spousal income beneficiary)	Fully includible (usually fully deductible unless inclusion of non-spousal income beneficiary)	Fully includible (usually fully deductible unless inclusion of non-spousal income beneficiary)	Fully includible (usually fully deductible unless inclusion of non-spousal income beneficiary)	Fully includible (usually fully deductible unless inclusion of non-spousal income beneficiary)
Gift Tax Considerations	Inclusion of any non-spousal income beneficiary(ies) may create gift tax implications	Inclusion of any non-spousal income beneficiary(ies) may create gift tax implications	Inclusion of any non-spousal income beneficiary(ies) may create gift tax implications	Inclusion of any non-spousal income beneficiary(ies) may create gift tax implications	Inclusion of any non-spousal income beneficiary(ies) may create gift tax implications
Taxation of Distributions	Four-tier; Ordinary Income, Capital Gain, Tax-free, Principal	Four-tier; Ordinary Income, Capital Gain, Tax-free, Principal	Four-tier; Ordinary Income, Capital Gain, Tax-free, Principal	Four-tier; Ordinary Income, Capital Gain, Tax-free, Principal	Four-tier; Ordinary Income, Capital Gain, Tax-free, Principal
Investments within the CRT	Manage for total return, with low volatility. If trust investments earn more than payout rate, remainder interest to charity will be larger. Income stream can be managed to be characterized as mostly capital gain, as opposed to ordinary income.	Manage for total return. If trust investments earn more than payout rate, income beneficiary will enjoy an increasing income stream. Income stream can be managed to be characterized as mostly capital gain as opposed to ordinary income.	Manage for total return when deferral desired, then switch to income-oriented investment when payout is desired.	Manage for total return when deferral desired, then switch to income-oriented investment when payout is desired.	Manage for total return when deferral desired, then switch to income-oriented investment when payout is desired UNTIL FLIP. Can only use make-up provision until switch year, then trust is treated as a SCRUT.
5% Probability Test	Must Pass	Not Applicable	Not Applicable	Not Applicable	Not Applicable
10% Remainder Interest Test	Must Pass	Must Pass	Must Pass	Must Pass	Must Pass
Income Deferral Possible	No	No	Yes	Yes	Only Prior to the FLIP when the trust is acting as a NICRUT or NIMCRUT
Make-Up Provision	Not Applicable	Not Applicable	NO way to make-up for years in which ordinary income was less than the required payout	If income is more than payout rate, then income MUST be paid out up to the current year's payout rate plus any deficiencies from prior years.	ONLY while functioning as a NIMCRUT prior to FLIP, if income is more than payout rate, then income MUST be paid out up to the current year's payout rate plus any deficiencies from prior years. AFTER FLIP, trust is treated as a SCRUT, and make-up account.