GRANTING TO CHINA

2027 Donor Guide

Staff Capabilities & Compliance Partners

Give2Asia is a US-based 501(c)(3) nonprofit organization that maintains a China Representative Office under China's Overseas NGO Law*. Give2Asia's registration enables us to make grants for a wide range of issues across the whole country. Give2Asia's China Chief Representative, Ms. Carol Yang, and a staff of eight, have the ability to:

- Develop a working relationship with grant recipients locally
- Work and develop content in both Chinese and English
- Keep all parties updated on recent project activities and compliance steps
- Address project-related issues that arise in China to help ensure the best possible outcome

All grantmaking into mainland China by Give2Asia must first be approved by Give2Asia's compliance partners, starting with its Professional Supervisory Unit (PSU). Give2Asia's PSU is the Chinese People's Association for Friendship with Foreign Countries, which works closely with the Ministry of Foreign Affairs. Final approval authority rests with the Beijing Public Security Bureau Overseas NGO Administrative Office (PSB). Give2Asia's PSU and PSB are legally entitled to monitor all the grants made and activities carried out by Give2Asia in China.

Give2Asia's Board of Directors reserves the final decision on whether a grant should be approved from the United States and serves as the legal custodian of all funds received by Give2Asia.

**A bilingual version of China's Overseas NGO Law can be found at: https://www.chinafile.com/ngo/laws-regulations/law-of-peoples-republic-of-china-administration-of-activities-of-overseas*

Grantmaking Process

Preparation

1. G2A collects concept note from the donor and grant recipient.
2. Donor signs commitment form verifying funds will be made available.
3. G2A submits grant plans for approval in China as part of its Annual Activity Plan (AAP).

China Approval

4. G2A's PSU reviews and approves AAP.
5. G2A files updated AAP with Beijing Public Security Bureau (PSB) for final approval.

U.S. Compliance

6. Donor wires funds to G2A for grants approved by PSU and PSB*
7. G2A completes due diligence on the grant recipient.*
8. G2A finalizes project proposal and budget.*
9. G2A Board reviews and approves grants.
10. Grant agreement between G2A and grant recipient is signed and funds are disbursed to China.

Monitoring & Reporting

11. G2A monitors grant activity & updates with project implementation.
12. G2A collects and approves interim grant reports.
13. G2A collects and approves final grant reports which are shared with donor.

**These steps are required before submission to G2A's Board of Directors.*

Windows For New Grants

Give2Asia will offer 3 opportunities to submit activity plans for the Chinese government's consideration beginning in 2026 for the 2027 calendar year. Estimated Time for PSU & PSB approvals is 3 to 4 months*. Give2Asia cannot guarantee approval of any grants.

Submission Window	Submission Deadline
December 2026	*November 20, 2026*
April 2027	*March 31, 2027*
August 2027	*July 15, 2027*

**Any grants approved by the PSU and PSB that cannot be completed or disbursed within the same calendar year will require re-submission in the December AAP window for the next calendar year. This will result in activities being paused—typically from January to March—until re-approval is received, delaying grantees' programs. For this reason, it is critical that Give2Asia receive donor funds as soon as approval is confirmed from both the PSU and PSB to ensure timely distribution—particularly as the end of year approaches. It is also beneficial for program activities to be completed within the same calendar year.*

Donor Documents Required by Give2Asia

1

Give2Asia Concept Note: Once the donor has confirmed that a project will be funded Give2Asia collects information from the donor and grantee, a template for which can be provided by Give2Asia. The concept note will be used in Give2Asia's formal Annual Activity Plan, which is submitted to its PSU and PSB. The following information needs to be provided:

- **Donor information**: Only the donor name is required.
- **Grantee information**: Name, location, point of contact and phone/email are required. This information may also be requested by the Chinese approval authorities.
- **Project information**: Brief project description, target issues, planned activities, expected outcomes, project location, grant period, sub-grantees or project partners, grant amount, and disbursement schedule.
- **Give2Asia activities**: This includes all contracted services, including grantmaking, advisory work, events, and research projects. For research projects, it should include the research project scope and how the results will be utilized.

Since the annual activity plans must be specific, donors should obtain all necessary internal approvals from their organization prior to submitting grants with Give2Asia. It is also preferable that the Concept Note information is submitted in both English and Chinese.

2

Contribution Commitment Form: The Chinese government needs confirmation from Give2Asia that funds will be made available for a project following their approval process. This form captures this commitment from the donor and provides more donor information for Give2Asia, such as a description of the donor's philanthropic goals, primary contact, and special requests. It also captures details on expected Give2Asia pricing for grantmaking, project management, due diligence, and any other services related to the project.

3 **Donor Advised Fund (DAF) Agreement:** This is a one-time document signed at the beginning of a relationship between Give2Asia and a donor. Once signed, Give2Asia can establish a fund to hold and account for your donations as they wait to be granted and take guidance over email without requiring additional signed documentation for each grant request. For new donors beginning with a grant to China, Give2Asia requests that the DAF Agreement be signed before the receipt of funds.

Grants To Government Entities

Give2Asia's China Representative Office can facilitate grants to government entities in mainland China, which will all go through the same grant-specific due diligence process as Give2Asia's grants to non-profit entities.

Grants To Schools

Education grants which involve scholarships, infrastructure, capacity-building or training activities carried out by universities, high schools, middle schools, primary schools, and kindergartens require the school (and grantee, if not the school) to submit an additional document called an Intent Letter. The Intent Letter would contain information showing the grantee's and school's willingness to work with Give2Asia for the planned activity of the grant. This document should be prepared early in the process (before the grant is submitted to the AAP), as some schools (particularly university foundations) have more internal processes to clear in order to provide such a letter. Give2Asia's China Representative Office will work directly with the grantee to receive this document. No input is required from the donor.

Adjustments

Once a grant has been formally approved by the Chinese government, any adjustment requests from donors must be submitted in writing to Give2Asia. All adjustments will be reviewed by Give2Asia prior to submission to the PSU and PSB for their consideration.

- Adjustments may be considered if they entail: Grant amount changes, grant period changes, shifts in budget allocations or modifications to select project activities.
- Adjustments may not be considered if they include changes to project goals and project partners.

Due Diligence

Once the PSU and PSB approve an activity plan, a due diligence check is carried out. Should a grant not pass a due diligence check, Give2Asia will inform you so you can decide how to proceed with future grantmaking. Give2Asia's grant and project management procedures include:

- Conducting a due diligence review of the grantee organization in line with U.S. and China law
- Reviewing project proposals and conducting Give2Asia board approval of all grants
- Entering into a legally binding grant agreement with the grantee for the project
- Disbursing grant funds to the grantee in China through Give2Asia's representative office
- Monitoring project implementation regularly via virtual and in-person meetings
- Ensuring that projects stay on track both in terms of the government approved timeline, scope, and budget
- Gathering reporting from the grantee that complies with both U.S. and Chinese government requirements, in addition to donor reporting requirements as required

Equivalency Determination (ED) requirement: Under certain circumstances, when Equivalency Determination is required by United States IRS regulations, the donor will be responsible for paying this certification. A new ED will cost US$2,500.

Publicity

To remain compliant with Chinese law and regulations, Give2Asia is the grantor and bears all legal liabilities associated with the project. Give2Asia must be referred to as the grantor in all publicity activities or materials within mainland China. No regulations apply for materials produced and disseminated outside of China.

Grant Description

- For donors, Give2Asia suggests the following language: “This project is sponsored by [DONOR] and is granted and managed by Give2Asia.” In Chinese, “此项目由[捐赠方]出资，通过赠与亚洲捐赠并管理.”
- For corporate donors, the company or corporate foundation name can be used with ‘Give2Asia’ mentioned alongside. Any use of corporate logos or corporate foundation logos must be used alongside Give2Asia's logo.

Public Relations & Press Releases

- For public events in China for which Give2Asia's input, feedback, or attendance is needed or requested, please provide at least two weeks' notice. Before any publicity activities are conducted in China, please make sure Give2Asia is included in the review process to ensure compliant, clear, and effective communications.
- If needed, Give2Asia may seek guidance from the related administrative agencies to ensure that all activities comply with local requirements.

Donor-Advised Fee Structure

Give2Asia will be an active participant in every stage of the grant and project. Due to the project and administrative management that China's Overseas NGO Law requires, Give2Asia has a modified pricing structure for grantmaking into mainland China. As of Jan 1, 2026 and effective through the 2027 grant year, this pricing structure is as follows:

Grant Size	Service Pricing
Up to $25,000 USD	$3,000
$25,001 to $100,000 USD	13%
$100,001 to $500,000 USD	11%
Over $500,000 USD	9%

Primary Points of Contact

New Donors	Existing Donors
Rick Schawelson Director of Partnerships rschawelson@give2asia.org (U.S.-based)	**Tiffany Cao** Senior Philanthropy Officer tcao@give2asia.org (Corporations, Corporate Foundations)
Li Xing China CEO lixing@give2asia.org (China-based)	**Annly Duong** Philanthropy Advisor & Operations Manager aduong@give2asia.org (Individuals, Families, Private Foundations)