



LIFE INSURANCE

Financing Options At-A-Glance

ADVANCED MARKETS

This chart summarizes some of the financing options available to fund a large life insurance need.

	Private Split Dollar	Private Financing	Premium Financing	Dual Loan Planning
Lender	Mom/Dad (Grantor)	Mom/Dad (Grantor)	Bank	Mom/Dad (Grantor) and Bank
Description	Mom/Dad pays premium on behalf of Trust and Trust must pay back greater of cash value or premiums paid	Intra-family Loan Transaction	Approved third-party lender (First Insurance Funding) provides loan to Trust for purchasing life insurance	Combining different loan arrangements to minimize loan interest cost (Private and Premium)
Loan Interest Rate or Annual Cost of Financing	Economic benefit cost (annual term costs or Table 2001 rates) ¹	Applicable Federal Rate (AFR) ² : Short-term (0–3 years), Mid-term (3–9 years), or Long-term (9+ years)	LIBOR + spread (typically)	Rates linked to each type of loan arrangement
Gift Tax Impact of Loans	No gift taxes	No gift taxes	No gift taxes	No gift taxes
Gift Tax Impact of Interest	Economic Benefit cost is a gift to the Irrevocable Life Insurance Trust (ILIT). Subject to gift taxes	Grantor may make a gift to the trust to pay interest. If Grantor makes a lump sum loan upfront, trust may be able to pay interest requiring no gift from Grantor	Grantor makes gift of interest to ILIT. ILIT pays interest to lender. Subject to gift taxes	If lump sum, trust has assets to pay interest to grantor - no gift necessary. Grantor pays lender interest directly - no gift necessary
How it Works	Mom/Dad as lender provides liquidity to the ILIT to pay large premiums on needed policy	Mom/Dad makes loans to their ILIT to provide liquidity to pay large premiums	The lender makes the loan to the ILIT to provide liquidity to pay large premiums	A combination of a personal loan to Mom/Dad and a Private Finance loan between Mom/Dad and their ILIT
Benefits	Minimizes gift tax costs	Minimizes gift tax costs	No need to liquidate taxable assets to fund liquidity needed for premiums	Minimizes gift taxes and reduces the need to liquidate taxable assets to fund premiums
Collateral	Policy	Not required but may be advisable	Policy and/or other liquid assets	Collateral requirements of commercial lender
Potential Generation-Skipping Transfer Tax (GSTT) Impact	GSTT exemption should be allocated to gift of economic benefit amount	GSTT exemption should be allocated to gifts of interest	GSTT exemption should be allocated to gifts of interest	GSTT exemption allocated to gifts of interest

1. Instead of loan interest which is based on the cumulative loan principal balance, the economic benefit cost (which is based on the death benefit amount and age) is used. This can be quite low at the younger ages, especially when a survivorship policy is used. However, the economic benefit rates increase over time as the insured ages. It may make sense to consider Private Split Dollar (PSD) arrangement initially and switch to a Private Finance when the economic benefit rates get too high.

2. Interest is based on Applicable Federal Rates (AFR) published monthly by the government.

Trusts should be drafted by an attorney familiar with such matters to take into account income, gift, and estate taxes, including generation-skipping transfer taxes. Failure to do so may result in adverse tax consequences.

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