



*Approved by the EWU Foundation Board of Directors June 15, 2021*

## **Campaign Counting Policy**

### **CASE compliance**

To ensure the highest possible gift and campaign integrity, all charitable contributions to the Eastern Washington University Foundation (heretofore referred to as the Foundation) will be counted and recorded into the University Advancement database of record in accordance with the standards set forth by the Council for Advancement and Support of Education (CASE). Any exception to CASE standards must be approved by the Vice President for University Advancement.

### **Acceptable gifts**

The Foundation will make every effort to accommodate and accept all charitable contributions from donors. However, it will not accept gifts that:

- Violate the terms of this policy;
- Are for purposes that do not further the university's mission;
- Could damage the reputation of the university or the Foundation;
- Are too difficult or expensive to administer;
- Could create unacceptable liability or cause the university to incur future unanticipated expenses;
- Restrict the ability to seek and accept gifts and grants from other sources;
- Would jeopardize the foundation's tax-exempt status; or
- Provide a donor with goods or services of financial value in exchange for said donor's gift unless such value is fully disclosed in the time and manner as required under federal and state law and regulations.

If a gift falls into one of the above categories, the dean or development officer working on the gift must notify the Vice President for University Advancement, who will make the final decision as to whether to accept it or bring it forward to the Gift Acceptance Committee. The Finance Committee shall serve as the Gift Acceptance Committee.

### **Gifts from public officials, political figures and political committees**

Gifts to the Foundation from public officials, political figures, campaign committees, political action committees, or other organizations that make expenditures supporting or

opposing candidates or causes, may not be conditioned on or result in any personal benefit to the contributor or a family member of the contributor (for purposes of such gifts, “personal benefit” should be interpreted broadly). No university employee, or agent on behalf of the university, may knowingly provide or promise to provide a personal benefit to such a contributor (or family member of such a contributor) as a condition of or in connection with such a gift. Questions regarding the propriety of such a gift should be directed to the Vice President of University Advancement.

### **Submitting and executing gifts**

In order for gifts to Eastern Washington University or the Foundation to be credited to the campaign, they should be routed to and recorded by the Foundation gift processing office. This will assure that the donor receives proper acknowledgement, recognition, and relevant tax information.

The following gifts and pledges received from July 1, 2017 through June 30, 2027 will be counted toward the campaign:

- Cash and credit cards.
- Gifts of cash in which the donor retains no interest, are paid in full and have an established fund do not require a written gift agreement or any prior approvals. However, the donor may want to designate or restrict the uses and purposes of their gift to areas or units of EWU that they most wish to support. Wherever possible a Memorandum of Understanding (MOU) documenting the intent of the gift will be established and signed by both the donor and the Executive Director of the Foundation or designee.
  - \$5,000 minimum shall be required for the establishment of a restricted account.
  - \$25,000 minimum shall be required for the establishment of an endowment account.
- Unrestricted gifts of cash will be deposited into the Eastern Fund. These funds will be used to support the Foundation’s highest priorities and may be added to the Foundation’s endowment.
- Securities (e.g., publicly-traded securities, closely-held stock, illiquid securities) will be counted by using an average of the high and low trading price on the date

the securities are received. Gifts of marketable securities in excess of \$250,000 should be reviewed by the Gift Acceptance Committee.

- In most cases, gift of marketable securities will be promptly sold in accordance with established Foundation practice. The Vice President of University Advancement must approve any request by a donor that the foundation hold and refrain from selling a marketable security.
- Non-marketable or closely held securities (e.g., partnerships, limited partnerships, LLC, closely-held companies) may be accepted on a case by case basis after review and recommendation by the Gift Acceptance Committee and approval of the full Foundation Board of Directors.
- Real Estate will be counted at fair market value on the effective date of the gift as determined in accordance with Foundation policies and IRS rules and regulations. Real estate must be accepted by the Gift Acceptance Committee. If the donor has obtained an appraisal that meets IRS tax deduction substantiation requirements, the Foundation may use the appraisal for gift accounting purposes. If an appraisal is not available, an alternative method of valuation acceptable to the Director of Advancement Services will be used.
  - Retained life estates—the foundation may accept a gift of a personal residence which is subject to a retained life estate. Acceptance must be approved by The Investment Committee and Gift Acceptance Committee. It is required that the donor assume responsibility for ongoing property taxes, insurance and maintenance for the duration of the life estate. Consistent with CASE standards, retained life estates will be counted and donors credited with the appraised market value of the property on the date of the gift. Gift receipts will be issued in accordance with IRS guidelines.
- Pledges of \$10,000 or more, made in writing. The standard time provided for payment of pledges will be up to five years. At the time the pledge is made, provisions may be made for a longer payment period, as determined by the Gift Acceptance Committee chair or their designee.
- Irrevocable deferred gifts of charitable gift annuities (CGA's). The Foundation does solicit and offer CGA's to the residents of the state of Washington and EWU is authorized by state law to offer CGA's for the benefit of the

University. Minimum of \$10,000 and gifts of \$250,000 or more require EWU Board of Trustee approval. Charitable gift annuity contracts that meet this policy and are entered into in exchange for assets other than cash require approval by the EWU Board of Trustees. The Foundation may at times solicit and offer CGA's to the residents of the state of Washington through National Gift Annuity Foundation as it is authorized by the state law to offer CGA's for the benefit of the Foundation. Any CGA's to the National Gift Annuity Foundation must be approved by the Gift Acceptance Committee. The University or National Gift Annuity Foundation may administer these gifts until such time the Eastern Washington University Foundation has an adequate asset base to cover the liability minimums.

Consistent with CASE standards, gift annuities will be counted and donors credited with the face value of the annuity on the date of the gift. Gift receipts will be issued in accordance with IRS guidelines.

- Irrevocable deferred gifts of charitable remainder trusts. Approved by the Gift Acceptance Committee. Must be a minimum of \$100,000 and the payout rate is 5% or lower, unless otherwise approved by the Investment Committee.  
Consistent with CASE standards, gift annuities will be counted and donors credited with the face value of the annuity on the date of the gift. Gift receipts will be issued in accordance with IRS guidelines.
- Irrevocable deferred gifts of charitable lead trusts. Due to the potential for liability, the Foundation may accept an appointment as trustee of a charitable lead trust only upon review of all relevant circumstances and approval by the full Board of Directors. Minimum amount to establish \$100,000.
- Irrevocable deferred gifts managed by external parties in which the Foundation is named as an irrevocable beneficiary will be counted at fair market value on the date the Foundation is provided with written documentation where the terms of such gift, including those governing the holder of the preceding interests, are satisfactory to the Foundation.
- Gifts of fully paid life insurance of which the Foundation is owner or beneficiary. The Foundation will not accept policies where the Foundation is obligated to make any future premium payments unless the donor commits to making annual gifts to cover such payments and/or understands that the university may

unilaterally exercise its right to surrender the policy for its cash surrender value. Gifts of all life insurance must be approved by the Gift Acceptance Committee. Partially or fully paid-up life insurance policies are counted as outright gifts to the university at the cash surrender value provided by the insurance carrier at the time of the gift. If the policy is not fully paid up at the time of the gift, then any premium payments the donor makes to the insurer or the University (which in turn is used by the Foundation to pay the premium) is counted as an outright gift at the full value of the premium paid.

- Bequest expectancies – the Foundation welcomes notification by donors that they have included the Foundation in their wills or estate plans. To be counted the Foundation must have written documentation from the donor or the donor’s advisor as to the bequest intention (e.g., a copy of a trust, will or codicil, or a signed letter/intent form). The Foundation does not book or count revocable future gifts or bequests and per IRS regulations, the Foundation does not provide any gift receipt to donors until the gifts are realized. The Foundation, per CASE standards may recognize and count amount as a pledge the face value of a specific bequest or the reasonable minimum estimated value or residual bequest as provided by the donor, or if none provided at \$5,000. Bequests will be counted as follows based upon the age of the donor at the end of the campaign. Age 50-59, gift is counted at 25% of face value, 60-69 gift is counted at 50% of face value and age 70 and over the gift is counted at 100%
  - Where the vesting for the Foundation depends on the demise of more than one person, the youngest such person must be of the requisite age for subtotal valuation. A bequest contingent on the spouse pre-deceasing the donor will be counted; if contingent on children or others it will not.
  - Neither the Foundation nor any of its employees acting on behalf of the Foundation may agree to act as the successor trustee of a living trust or the executor of any will in which the university is named as a beneficiary, without the approval of the Gift Acceptance Committee.
  - The Foundation may count the increased difference in value of a previously recorded bequest expectancy with appropriate written documentation provided by the donor. The documentation must support a

minimum increase of 30% or \$100k in greater value from the original recorded value.

- Other revocable gift commitments (e.g., a retirement plan or life insurance policy designation naming the Foundation as a beneficiary) will be counted in accordance with the policies that apply to bequest expectancies as described above.
- Estate distributions will be counted at fair market value on the effective date of the gift (the date the gift is received by the Foundation).
- Gifts of tangible personal property (e.g., jewelry, works of art, furniture) which are to be sold will be counted at fair market value as reported by the donor upon delivery. The Director of Advancement Services and Gift Processor is responsible for conducting due diligence review on, and approving the acceptance of, all gifts of tangible personal property. It also manages the sale of such assets.
- Gifts of tangible personal property (e.g., works of art, lab equipment, athletic equipment) which are to be held by the university in furtherance of its mission. Note that software licenses are not considered to be bookable gifts per CASE guidelines, because EWU does not “own” those licenses.
  - A dean of a school or a head of a unit may authorize acceptance of tangible personal property to be kept and used after taking into consideration the following factors:
    - Whether the property furthers the mission of the university or a specific school or unit;
    - carrying costs and potential liability;
    - costs relating to long-term storage;
    - any donor-imposed restrictions on the use, display or sale of the property; and
    - costs relating to transportation and/or installation.

The dean or unit head should first seek approval from the Vice President for University Advancement before proceeding.

Information about any gift of tangible personal property should be forwarded to Advancement Gift Services, which will credit the donors and prepare an appropriate gift receipt.

- Private grants will be counted in accordance with Foundation policy.
- Corporate matching gifts will be counted provided they follow the guidelines of the IRS and the company providing the match.

- Corporate sponsorships will count in the annual fundraising totals when such support does **not** constitute advertising.