

WHITTIER COLLEGE

GIFT ACCEPTANCE POLICY



Approved by Whittier College Board of Trustees, February 22, 2025

Preface

Whittier College, a not-for-profit organization under the laws of the State of California, encourages the solicitation and acceptance of gifts to Whittier College (hereinafter referred to as “the College”) for purposes that will help the College to further and fulfill its mission. The following policies govern acceptance of gifts made to the College or for the benefits of any of its programs.

Mission Statement

Whittier College is a residential four-year liberal arts institution that prepares students from diverse backgrounds to excel in a complex global society. Through challenging, interactive courses taught by accomplished professors, students learn to make connections across disciplines, understand cultural perspectives, and integrate learning with practical application. Inspired by a Quaker heritage, the Whittier education equips students to be active citizens and effective communicators who embrace diversity and act with integrity.

Purpose of the Gift Policy Manual

The staff and volunteers of Whittier College solicit current and deferred gifts and grants to ensure the future growth and mission of the College. Gifts may come from individuals, industry, foundations, or other sources, for unrestricted or restricted purposes. Whittier College makes no commitment of resources in return for gifts other than agreeing to put the gift to use as the donor designates if a designation is made. These policies govern the acceptance of gifts by the College and the procedures for processing them. The provisions of these policies shall apply to all gifts received by the College for any of its programs or services. “The College” in the text refers to all Whittier College staff, faculty, students, and volunteers.

Right to Revise

This gift policy manual is subject to revision based on organizational and operational imperatives. In matters of fiscal policy, the College President and the Board of Trustees must approve any recommended revisions. In matters of organizational and operational imperatives, the Vice President of Development may revise the policy and will clarify any questions regarding this manual to the trustees.

The College 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 College’s mission.
- Could damage the reputation of the College.
- Are determined too difficult or expensive to administer.
- Could result in unacceptable liability or expenses.
- Would jeopardize the College’s tax-exempt status.
- Provides a donor with goods, services, or anything 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 laws and regulations.
- Are intended to influence the College’s independent decision-making such as in the admissions process, athletic team membership, awarding of scholarships, selection of vendors or other services, property purchases, etc.

Revised

February 2025

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Types of Gifts

A. Cash Gifts

The postmark date is the gift date for gifts mailed to Whittier College. Checks should be made payable to Whittier College and mailed or delivered to: Whittier College Office of Development
13406 E. Philadelphia Street P. O. Box 634 Whittier, CA 90608-0634

Donations to the College require varying levels of review prior to acceptance depending on the amount of risk presented by the gift. A summary below shows the level of approval needed for each class of gift. Gifts of any type not listed below must be treated as High-Risk Gifts and submitted for approval by the Philanthropic Acceptance Committee.

The Board of Trustees will create a Philanthropic Acceptance Committee hereinafter referred to as “the PAC”) to be called upon for various fund acceptance duties. The PAC shall be comprised of the Chair, Board of Trustees; Chair, Investment Committee; Chair, Advancement Committee; the President, Vice President of Development; and the Associate Vice President of Development Operations and Services, The Chair of the Advancement Committee also chairs the PAC. The PAC shall meet at the discretion of the chairperson as necessary, in person, phone or online conference.

I. Minimal Risk Gifts

A. Types of minimal risk gifts:

1. Outright gifts of cash paid by cash, peer-to-peer payment apps, check or credit card.
2. Gifts or pledges of cash valued at no more than \$1,000,000 to be paid over five or fewer years. Gifts restricted to a particular purpose are documented on a Gift Agreement, reviewed by the Associate Vice President of Development Operations and Services and signed by the Vice President of Development and the donor.
3. Publicly traded securities or stocks, shares of stock in closely held companies, bonds, and government issued bonds, and mutual funds.
4. Cash gifts from donor-advised or donor-directed funds.
5. Gifts from Individual Retirement Accounts.
6. Bequests or irrevocable estate gifts.
7. Personal property or artwork whose fair market value is \$25,000 or less.

B. Approval Procedure for Minimal Risk Gifts

1. Gift Officers may accept any minimal risk gifts without approval and process them according to the Gift Processing Policies.
2. Gift-in-Kind Form signed by the Vice President of Development. Gifts with a value of more than \$5,000 require a qualified appraisal (paid for by the donor) to be added Whittier’s assets and be tax deductible to the donor.
3. These gifts may be either restricted or unrestricted in purpose. Gifts which are donated to Whittier College without any express limitation placed upon them will be credited to the unrestricted Whittier Fund account.

II. Moderate Risk Gifts

A. Types of moderate risk gifts

1. Gifts or pledges of more than \$1,000,000 or for longer than five years are documented on a Pledge Agreement reviewed by the Associate Vice President of Development Operations and Services and signed by the Vice President of Development.
2. Life estates, real property, especially residential, that is unlikely to be problematic, e.g., land use, environmental or zoning issues.
3. Personal Property or artwork whose fair market value is \$25,000 - \$100,000.
4. Gifts for special purpose endowments and unrestricted endowment funds may be established with a minimum gift of \$50,000.

B. Approval Procedure for Moderate Risk Gifts

1. The Vice President of Development may request attorney review of gift terms prior to accepting any questionable gift.
2. Real property gifts are evaluated by the Vice President of Development and the PAC Committee.
3. Personal property or artwork require a Gift-in-Kind Form signed by the Vice President of Development. Gifts with a value of more than \$5,000 require a qualified appraisal (paid for by the donor) to be added Whittier's assets and be tax deductible to the donor.
4. For endowments specifically: Currently, the College employs an endowment income spending rate. The spending rate is set annually by the Board of Trustees. The terms and conditions of special purpose endowments must be approved by the PAC. A permanent endowment may be established with a minimum gift of \$50,000.

III. High-Risk Gifts

A. Types of High-Risk Gifts

1. All gifts of real property, whether outright, bequest, bargain sale or in CRT that have a likelihood of being problematic: due to environmental issues; land use concerns, etc.
2. Closely held securities and S-Corp stock that have a likelihood of being problematic.
3. Gifts of personal property or artwork with fair market value exceeding \$100,000.
4. Oil, gas or mineral rights or interests.
5. Copyrights, patents or other intellectual property ownership or licenses.
6. Items that are unusual or of questionable value.

B. Approval Procedures for High-Risk Gifts

Proposed gifts are evaluated on a High-Risk Gift Review and Acceptance form which must be approved before further action is taken.

1. The PAC may request review by counsel for certain types of high-risk gifts, particularly conditional pledges, donations of oil, gas or mineral rights and interests and donations of interest or licenses for intellectual property.
2. Depending on the type of real property, the Vice President of Development may require an environmental impact study, property inspection or other necessary assessment. The PAC and Finance Committees of the Board of Trustees manage the review and process.
3. All documentation, including legal counsel opinions and high-risk reviews shall be kept in the donor's CRM, Development Office's SharePoint Account or hardcopy files.

IV. Gifts of Artwork

Gifts of art are subject to review and recommendation by the PAC.

V. Gifts of Services and Partial Interests

Because a charitable gift involves the transfer of ownership of an asset, a gift of services is not a deductible gift. If the service also involves the donation of tangible items, that portion may be considered charitable. Partial interests, such as the use of a vacation home, are not charitable gifts for the same reason.

VI. Gifts of Intellectual Property

A donor's deduction for a donation of a patent or other intellectual property is its fair market value, minus any gain they would have realized if they had sold the property at its fair market value on the date of the gift. Generally, the donor's deduction is the lesser of the property's fair market value or its basis. Whittier should not rely on donors' valuations. If the College can independently determine a fair market value of the IP at the time of receipt, they should report that value. Gifts of IP for which the institution cannot determine a fair market value should be excluded from reports. For details see IRS publication 526 [<https://www.irs.gov/pub/irs-pdf/p526.pdf>]

VII. Gifts of Real Estate

Whittier College may accept gifts of real estate, including houses, condominiums, commercial properties, farms and ranches, rental property, and undeveloped land, after a thorough review of the following factors:

- A. The usefulness of the property for Whittier College purposes
- B. The marketability of the property
- C. The existence of restrictions, reservations, easements, and/or other limitations
- D. The existence of encumbrances, such as mortgages and mechanics liens

- E. Carrying costs, such as property owner's association dues, taxes, insurance, and other maintenance expenses
- F. Fair market value in relation to the costs and limits listed above as determined by a qualified appraisal conducted in accordance with Internal Revenue Service (IRS) standards.
- G. Prior to the acceptance of any parcel of real property, an assessment of the potential environmental risks will be conducted. This assessment shall include the following:
 - 1. An inquiry of the present owner regarding his, her, or its knowledge of the history of the property
 - 2. A title search to determine who the prior owners have been.
 - 3. A consultation with federal, state and local environmental agencies to find out whether the property has any history of hazardous waste contamination.
 - 4. A visual inspection of the property for any evidence of environmental hazards. A more intensive environmental audit conducted by a professional service also may be required.
 - 5. For all gifts of real estate, the Vice President of Development, or their designee will consult with the President, the Chief Financial Officer and College legal counsel concerning the implications of accepting the gift.
 - 6. No gift of real estate shall be accepted without prior approval of the PAC of Whittier College.
 - 7. Generally, no gift of real estate shall be accepted without first being appraised, at the expense of the donor, by a Qualified Appraiser approved by Whittier College who shall have no business or other relationship to the donor.
 - 8. Real estate shall not be accepted to fund a charitable gift annuity without seeking an opinion as to the permissibility of this action under the laws of the state or states involved and approval by the PAC.
 - 9. Special attention shall be given to the receipt of real estate encumbered by a mortgage, as the ownership of such property may give rise to unrelated business income for Whittier College and the disqualification of certain split interest gifts unless handled in a proper manner.

VIII. Unacceptable Gifts

Whitter College will not accept some assets as gifts. In special circumstances and after review according to the high-risk gift review procedure, the PAC and the President may decide to accept these types of gifts:

- A. Used automobiles
- B. Trailer or mobile homes
- C. Time share interests
- D. Boats
- E. Livestock
- F. General partnership interests
- G. Other gifts as the PAC may deem inappropriate

Gift Recognition and Naming

General Recognition and Naming Policies

Whittier College has a long-standing tradition of naming College properties, academic and non-academic programs, and facilities in honor of persons or entities that have made personal contributions to the College. Recognition must be consistent with the College's mission. Accordingly, all proposals for naming recognition shall be reviewed and approved in compliance with this policy and with related College policies and guidelines. There are special recognition giving societies for the College. Unless donors request anonymity, they will be recognized at the appropriate level in these groups.

Recognition Procedures - Philanthropic

The Vice President of Development establishes Minimum Gift Levels and guidelines for gift naming opportunities. Gift levels for equipment, programming and conference/symposia should be sufficient to support the entire project. (including associated events and activities)

I. Procedure for Approval

Gift Officers may submit a request for Major Gift Name Recognition to the Associate Vice President of Development Operations and Services. The request must include the name of the donor to be recognized, the proposed naming opportunity, how much was or will be donated, and how the named gift will be recognized. The Associate Vice President of Development Operations and Services will manage the approval process, depending on the nature of the gift and recognition sought.

II. Minimum Amount

The minimum amount needed to fund the respective opportunities described below may be changed at any time.

III. Facilities

Proposals for new construction are subject to the approval of the Board of Trustees. Donor naming opportunities are administered by the Vice President of Development. This applies to new or existing physical plant facilities, rooms, wings, improvements, landscaping or recreational areas based on the criteria set forth below.

The Vice President of Development is responsible for reviewing the documentation supporting the amount needed, the funds received or other pertinent information. While the following funding requirements are recommended, the Trustees retain the right to

consider varied levels when the best interests of the College are served by some alternative arrangement.

- A. Campus Landmarks and Landscaping Requirement: Total direct costs plus ongoing maintenance opportunities for landmarks and landscaping will be considered on a case-by-case basis.
- B. Current Facilities Requirement: 51% or more of the Renovation Cost. Previously constructed facilities can be named by a donor or a donor's representative through a substantial contribution of 51% or more of the renovation cost of the facility. If a facility was previously named and must be subsequently demolished or substantially rebuilt, the name on the demolished facility may be moved to another appropriate place as determined by the Board of Trustees in collaboration with the donor or their representatives. If a new donor is facilitating the rehabilitation of the facility, the new donor will be granted an appropriate naming opportunity of the renewed facility.
- C. New Facilities Requirement: 51% or more of Construction Cost. 51% or more of the estimated construction cost of the facility and, where possible, additional endowment support to defray operational cost, is required to name capital projects funded by private funds at the College. Certain exceptions can be made by the Board of Trustees depending on the funding plans for a specific capital campaign project. In general, naming criteria for funding rooms, wings and improvements also require contributions of 51% or more of the estimated construction cost. An additional gift of an endowment to maintain the facility may also be required.

IV. Naming Presidential Chairs

- A. The proper form for naming a Presidential Chair is, The [Donor Name] Presidential Chair in [Subject]
- B. Candidates for a Presidential Chair must have more than a national reputation, either recognized internationally or clearly moving in that direction.
- C. Candidates' research and focus should reflect the emphasis of Whittier College's strategic plan.
- D. Candidates should be a scholar recognized for interdisciplinary accomplishments and focused on a niche that could have international implications.
- E. Holders of the Presidential Chair should operate College-wide and not be assigned to a department.
- F. The endowed funds will not only create a Presidential Chair, but a portion will be used to create a scholarly community, including funding for

1. Two guaranteed and ongoing named research assistant positions
2. Two post-doctoral research positions or graduate student fellows
3. Undergraduate scholarships in the professor's field of study
4. A one-time \$50,000 stipend for the first year, termed a "setting-up" grant to help launch the scholarly community.

V. Naming Endowed Funds

Endowment Funds may be established with a donation (minimally listed below) and provided they support Whittier's Strategic plan, future activities or functions and with the approval of the Vice President of Development.

There are several types of endowments. Typical endowment funds and the corresponding minimum required amounts are as follows:

- A. Endowed Presidential Chair: \$3,500,000 (includes a \$50,000 "setting up" stipend.) or more
- B. Endowed Professorship (New FTE) \$2,500,000 or more
- C. Endowed Professorship (Current FTE) \$1,500,000 or more
- D. Visiting Professorship \$1,000,000 or more
- E. Lecture Series \$ 250,000 or more
- F. Student Fellowship \$ 100,000 or more
- G. Endowed or Named Scholarship \$ 50,000 or more
- H. Other Endowment Funds \$ 50,000 or more

Because conditions change over time, all endowment instruments should contain the following contingency clause: If at any time, in the discretion of the Board of Trustees of the College, the Fund shall no longer be necessary for the stated purpose, they shall have the authority to designate its use for a purpose that closely parallels the donor original intent.

- A. All endowed funds will be prudently invested as part of Whittier's endowment portfolio under the guidance of the Investment Committee of the Board of Trustees.
- B. The appropriation for expenditure for the uses and purposes for which an endowment fund is established (distributions for spending) will commence in the fiscal year which is one year after the fiscal year the gift was received. This is to coincide with the preparation of the annual operating budget.

- C. Distributions for spending are typically made annually at the beginning of each fiscal year the However, the Chief Financial Officer may change this in any fiscal year.
- D. The Finance Committee of the Board of Trustees governs the distribution policy and rate. The permissible spending amount for a fiscal year will be established on an annual basis using the spending rate. The approved spending rate percentage is applied to the market value. The market value is defined as the average of the market values of a historical 12-quarter period ending at the calendar year-end immediately preceding the fiscal year.
- E. Earnings above the established payout rate will be reinvested to provide for inflation and growth. This policy ensures preservation of the fund principal for future generations. This policy is subject to change at the discretion of the Board of Trustees.
- F. Donors must sign an Irrevocable Gift Agreement that includes language that specifically governs endowments. This form must specify the donor's requested designated use for the funds.
- G. If in the judgment of the College's Board of Trustees it becomes impractical or impossible to accomplish the purposes of the gift as stated in the Agreement or from an estate gift, the income or principal or both may be used to fund a different program as close to the donor's original intent as possible.
- H. If donors are to be recognized by their name on a building or fund and the full value of the gift or pledge is not realized as agreed to in the Irrevocable Gift or Pledge Agreement, the Board of Trustees reserves the right to remove the donor's name from the buildings or funds.
- I. Annual payouts from funds for endowed faculty positions will be allocated according to the amount established by the Finance Committee of the Board of Trustees.
- J. At the donor's request, the College may reinvest funds until the principal reaches the minimum level for a designated naming opportunity.
 - 1. In these cases, the income from the fund will be reinvested until the fund reaches the minimum level.
 - 2. Income may not be reinvested for more than five years to reach the minimum recognition level.
 - 3. Endowed funds that do not meet the minimum naming opportunity level after five years will be placed into an endowment fund benefiting the purpose as specified by the donor.

VI. Naming Opportunities

The Associate Vice President of Development Operations and Services will maintain a complete list of naming opportunities and be responsible for creating new opportunities for new campaigns.

VII. Matching Gifts

At Whittier College, we value the support of our community, including the generous contributions from businesses and corporations. When a business matches a voluntary contribution made by an employee or other eligible donor—such as a Board member—the matching amount is recognized as a corporate gift. This not only enhances the impact of the original donation but also strengthens the partnership between the College and its supporters.

A. Soft Credit for Matching Gifts

For donations made by employees of corporate donors, it is appropriate to grant soft credit for the matching gift amount to the initial donor. This practice acknowledges the crucial role of alumni, faculty, Trustees, and others in fostering corporate support.

B. Eligibility for Matching Gifts

Most corporations match contributions only from employees, retirees, board members, and, in some cases, their spouses. Distributions from donor-advised funds do not qualify for corporate matching since the individual did not have control over the funds at the time the distribution was made.

C. Verification of Matching Gift Availability

Due to the complexities surrounding matching gift eligibility, we encourage all donors to verify the availability of a match with the respective corporation before submitting a claim. This proactive step ensures that all potential contributions are maximized for the benefit of the College.

D. Considerations for Matching Gifts

Matching gifts are not treated as part of a gift agreement for three primary reasons:

1. **Ownership:** The funds matched by the corporation do not belong to the donor and therefore cannot be committed as part of a gift agreement.
2. **Employment Status:** There is no guarantee that the donor will remain employed by the company throughout the life of the commitment.

- 3. Program Continuity:** Corporations may discontinue their matching gift programs, which could affect the fulfillment of any commitments made.

VIII. Irrevocable Bequest Pledges and Life Income Gifts

Pledges or Life Income Gifts may be recognized with a naming opportunity if the present value of the Bequest or Life Income Gift Pledge meets the minimum gift level at the time of the pledge.

IX. Honorific Recognition Procedures

From time to time, faculty, staff or friends of the College may have offered such outstanding service to or for the College that a program, professorship or architectural feature may be named in the person's honor whether or not any donations were received designated to honor that person.

At the recommendation of Vice President of Development and College President and approval of the PAC, special naming considerations can be made to honor significant support to the College.

X. Procedure for Approval

Faculty, staff or administrators may submit a request for honorific recognition to the Vice President of Development.

The request must include the name of the individual to be recognized, rationale for naming, and information on the individual to be honored. Please note that any fees associated with honorific naming will be paid by requestor or their department.

Naming Opportunity Definitions

I. Endowed Institute or Research and Teaching Center

An academic center specializes in research or teaching in a particular field of study. Often Whittier College centers and institutes offer interdisciplinary study among several disciplines. An Institute or Research and Teaching Center cannot be named unless an endowment is fully funded.

II. Endowed Chair

Endowed chairs in recognition of a donor fund faculty compensation and provide research funds to a tenured professor named to the chair. Chairs named for recognition purposes only will not be filled until the endowment is funded.

III. Endowed Professorship

Like an endowed chair, a professorship offers a salary supplement, research and teaching support to designated tenured professors, but at a lower level of support. Professorships named for recognition purposes will not be filled until the endowment is funded. Professorships will not be named for active faculty members.

IV. Endowed (Named) Scholarships

All endowed scholarship naming opportunities are subject to the approval of the Vice President of Development to ensure that they align with the values and mission of the College. Should any circumstances arise after approval that could affect the integrity or public perception of the naming, Whittier College's legal counsel will work closely with legal advisors. This collaborative effort is designed to safeguard the philanthropic intentions of our donors and uphold the trust of our community.

The recipients of endowed named scholarships will be selected in accordance with Whittier College's established policies and procedures. While donor(s) may be consulted during the selection process, it is important to note that the final decision rests solely with the institution. This ensures that the selection process is conducted fairly and objectively, maintaining Whittier College's commitment to academic excellence and integrity in awarding scholarships.

V. Endowed (Named) Fund

A fund may be established to provide partial annual operating funds for a program, special research, guest lecturers and stipends for speakers.

VI. Capital Gifts

Gifts made during a capital campaign to build or endow the operations of a building may be recognized by naming rooms or other portions of the building according to the dollar amounts and opportunities devised by the Associate Vice President of Development Operations and Services.

VII. Term Fund

A gift at this level will provide a one-time grant to junior tenure-track faculty, graduate or undergraduate student for research. The gift may be distributed over a minimum of five years.

VIII. Library Collections

A donor who gives an amount agreed upon by the Vice President of Development and PAC (if needed) may be recognized by naming a special collection.

IX. Annual Scholarships

A donor can establish an unrestricted scholarship at Whittier College with a contribution of \$25,000 to the Whittier Fund. Please note that since this gift is part of a spend-down account, the named scholarship will be available only for the duration of the gift. This gift can be named. This means that the scholarship will support students for as long as the funds remain in the account, highlighting the immediate impact of the donor's generosity on the academic community.

Gift Solicitations

Major Gifts

Major gifts are \$50,000 and above with the exception of corporations and foundations which are \$25,000 and above. Major gift proposals may be made by Gift Officers through the prospect management process.

When the proposal has been approved by the donor and the College, Gift Officers collaborate with the Associate Vice President Development Operations and Services on a formal Gift or Pledge Agreement outlining the source of funding and gift terms. The Vice President of Development signs on behalf of the College.

Development Campaigns

At Whittier College, we engage in various development campaigns, including Capital, Comprehensive, Annual, General Campaigns, and special initiatives. To ensure clarity and consistency, each campaign will adhere to specific solicitation policies tailored to its unique goals and objectives.

- I. **Solicitation Policies:** Each campaign will establish its own set of solicitation guidelines that align with the overarching goals of Whittier College. These guidelines will provide guidance on how donations are solicited, ensuring that all outreach efforts reflect our institutional values and commitment to transparency.
- II. **Naming Recognition Opportunities:** Where appropriate, campaigns will outline naming recognition opportunities that enhance our current Whittier Gift Policy. These opportunities not only acknowledge the generosity of our donors but also foster a deeper connection between contributors and the College's mission.
- III. **Counting Policies:** Before the initiation of each campaign, specific counting policies will be established. These policies will determine how gifts are counted towards campaign goals, ensuring consistency and accuracy in tracking contributions.

The Whittier Fund

The Whittier Fund is an unrestricted fund that can be used to provide financial aid to students or operations of the College. Gifts to the Whittier Fund may be designated for scholarships or for general institutional support. This flexibility allows the College to allocate resources where they are most needed, ensuring the greatest impact on our students and academic programs. Donations to the fund may come from personal visits, direct mail solicitations, corporate matching gift programs, special events, and other campaigns or appeals.

- I. A Whittier Fund gift solicitation can be for any amount.
- II. Leadership gifts are \$1,000 - \$1,000,000.
- III. Named Scholarships:
 - A. Donors who contribute \$25,000 or more to the Whittier Fund may designate their gift to create a named scholarship.
 - B. Named scholarships will honor the donor's legacy and are established for the duration of the funding.
 - C. It is important to note that Whittier Fund Named Scholarships are structured as spend-down accounts. This means that the funds will be utilized within the lifespan of the contribution, and once the designated amount has been fully awarded, the scholarship will no longer be available. These funds, however, are renewable.

Strategic Prospect Management

Enhanced levels of effort and productivity require management tools that are only available through consistent use of the Whittier's Constituent Relationship Management (CRM) database to capture information and analyze opportunities. Strategic prospect management enhances research, cultivation and solicitation for annual, major and planned gifts and is coordinated for each prospect and donor.

Strategic prospect management is an ongoing process throughout the life of the relationship with the donor. It is to the advantage of the donor, institution and Gift Officers, that the process be a priority and not an afterthought. There are several elements to effective prospect management.

I. Assignment of Gift Officer

Engaging a prospective donor begins with preliminary identification to determine if the prospective donor has a propensity to make a gift and what about Whittier would be of interest. When a prospect has been qualified, a Gift Officer is assigned to create a donor strategy plan and begin engaging and/or cultivating the prospect.

II. Contact Reports

Throughout the relationship with the donor, contact reports are filed about meaningful contacts. Contact report activity must be filed within 30 days of contact. This establishes the donor's history with the institution and provides a record for others who might engage with the donor.

III. Prospect Pipeline Meetings

Monthly meetings of Gift Officers and other development staff are designed to discuss current major gift activities, campaigns, and develop donor solicitation strategies. These meetings should be among the highest priorities for the Development team.

IV. Moves Management

There is a progression to the successful closing of one gift and preparation to ask for the next. From initial cultivation to ongoing stewardship, it is the Gift Officer's responsibility to move the donor through the pipeline, from strategy to cultivation to solicitation to stewardship/renewal and back again. Gift Officers are required to have 100% portfolio penetration on an annual basis. If no moves management activity has occurred after six months, prospects will be sunset from Gift Officer portfolio. This entails relationship management at its paramount and following a moves management process in the advancement database.

Private Foundations and Corporate Gifts

I. All Private Foundations and Corporate Gifts activities

- A. The Director of Foundation Relations will lead all efforts for securing Foundation and Corporate Gifts for Whittier College.
- B. The Director of Foundation Relations will also assist by facilitating proposal submissions, adding required corporate documents, identifying potential funders, maintaining central files and tracking the acknowledgment and follow-up reporting process. The Director will also ensure that all funding agreements are reviewed, properly signed by the required Whittier College representatives and returned to the donor.
- C. The Director of Foundation Relations will initiate required reports according to the schedule set forth in the funding agreement. In the absence of a specified report schedule, the Director will see that annual reports are provided to the donor for the duration of the funding period.
- D. Reports will include a financial accounting of donated funds and any programmatic information that supports the appropriate use of the funds.

II. Proposal Tracking

Corporate and foundation proposals are tracked in the advancement CRM database. Copies of all funding proposals and agreements are to be maintained in the Foundation Relations central file and in the CRM when available.

Deferred Gifts

The Vice President of Development oversees solicitation and administration of all deferred gifts, including bequests, trusts, insurance policies, charitable gift annuities and other deferred gift instruments. Gift Officers must collaborate with the Vice President of Development on cultivation and solicitation strategies.

Advancement Operations and Gift Processing

Central Donor Files

Central files on individual donors and prospects (Donor Files) are located in the designated Development CRM, the Advancement SharePoint Folder, (Electronic files preferred) hardcopies in individual donor files within the College Development Office and they are maintained by the College Development Office staff.

Electronic (preferred) or hard copies of the following documents must be saved in the CRM, SharePoint or hard copy donor files.

- Proposals
- Gift documentation
- Documents that record the history of the relationship
- Any other pertinent news or documents
- Copies of gift acknowledgements

The Gift Officers are responsible for helping to build the central file (hardcopy or electronic) so that the institution's historical record may be as complete as possible.

Whittier College Funding Priorities

On an annual basis, prior to the start of every fiscal year, the Vice President of Development and College President shall set annual funding priorities that are in alignment with the Whittier College Strategic Plan.

Gift Processing Policies

Once accepted, gifts must be processed according to the following policies. A daily gift report detailing the previous business day's gift and pledge activity is sent to key college staff with a need to know.

I. New Gifts/Purpose

A gift of \$25,000 or more for a new purpose is assigned a unique fund code. New funds are not set up for gifts of lesser value. Gift Officers submit the New Fund Request Form, a fully executed Gift Agreement, or grant confirmation to the Director of Advancement Services. The Director will send new fund requests to the Associate Vice President, Development Operations and Services for approval and to forward requests onto the College's Controller. The Controller will send email notice of new fund creation to the Director of Advancement

Services, who will create the fund designation in the CRM to include a designation code, designation title, VSE Code, designation type, designation group, and Finance feed information. Once completed, the Director will notify the requestor, Associate Vice President, Development_Operations and Services, and Advancement Services staff.

Until a fund code is issued by Financial Services, Advancement Services records the gift to a holding account. This is done to ensure the funds are deposited in a timely manner and the donor acknowledged with a gift receipt. Funds deposited into a holding account may not be spent and do not earn interest until transferred to a permanent fund code established by Financial Services.

II. Gift Acknowledgements

Advancement Services ensures that gift receipts are generated by the CRM from the previous days gift entries. These are sent to the donors based on donor preference (electronic or postal mail). All donors who make gifts \$250 and above also receive a thank you letter signed by the College President and/or by the Vice President of Development as determined by a gift acknowledgement matrix set up and managed by Advancement Services.

III. Outright Gifts of Cash, Check or Credit Card

- A. The Gift Officer or person receiving the funds must fill out the Internal Donation Form and deliver the gift with the form to Advancement Services for processing.
- B. Formalized Gift Agreements must accompany all gifts and pledges over \$25,000.

IV. Gift Agreement Policy

Gift agreements at Whittier College are formal documents that outline the mutual understanding between the donor(s) and the institution regarding the donation. The following components are typically included in gift agreements:

A. Donor Information

- Full name(s) of the donor(s)
- Clarification of the funding source (individual, company, foundation, DAF, etc.)

B. Gift Details

- Amount of the gift
- Date the agreement is signed
- Designation and/or purpose of the gift, reflecting the donor's intent

- Pledge or payment schedule (if applicable)

C. Institutional Representation

Whittier College confirms its status as a registered charitable organization and non-profit public benefit institution. The donor understands that the gift will be administered according to the College's policies, which include any applicable administrative fees.

D. Future Considerations

Whittier College will make every effort to fulfill the donor's objectives as outlined in the agreement. If unforeseen circumstances arise that prevent the gift from serving its original purpose, the College will consult with the donor or their representatives. In the event the donor is unavailable, the institution's leadership will redirect the gift to a purpose most aligned with the donor's original intent.

E. Recognition

1. With the donor's consent, Whittier College may publicly recognize the gift in publications, press releases, and other appropriate venues. The donor(s) will be recognized as " _____ " for this purpose.
2. The Gift Officers or their designee must attach all documentation (letter, response card, email, and any notes) from donor so that the gift is correctly recorded for the purpose for which it was intended. If no documentation accompanies the donation, the assigned Gift Officers will contact the donor to verify, in writing, how the gift should be designated.
3. All documentation associated with gifts, pledges and pledge payments are scanned and filed by Advancement Services and in Advancement Services' Microsoft SharePoint account. This account is only used by Advancement Services to store all gift documentation and receipts.

V. Matching Gifts

A matching gift is a donation made by a company or organization to match charitable contributions made by its employees to Whittier College.

A. Policies for Matching Gifts:

1. Unrestricted Matching Gifts

Companies often indicate that their matching contributions are unrestricted, meaning the funds can be used for any charitable purpose at the College. In such cases, Whittier College will apply the matching gift to a fund aligned with the donor's original intent or preference, unless the company specifies otherwise.

- 2. Credit to the Same Fund:** Generally, matching gifts are credited to the same fund as the donor's original contribution. However, if the company has restrictions on how its gift can be used (e.g., prohibitions against funding construction projects or athletic scholarships), Whittier College will allocate the matching gift to a purpose acceptable to both The College and the donor. Matching gifts cannot be used to satisfy pledge payments.
- 3. Use of Funds:** When restrictions are placed by the matching gift company, Whittier College will work to determine an appropriate use of the funds that aligns with both the company's policies and the donor's intentions.

VI. Pledges

Pledges can be written irrevocable, written revocable or verbal. They are confidential and provided on a need-to-know basis.

- A. Only written irrevocable pledges are legally enforceable and recorded as an asset of the College. A written irrevocable pledge agreement includes language that the estate will pay the remaining balance if the donor predeceases fulfillment of the pledge. All pledge agreements will default to irrevocable unless noted by donor intent. Formalized Gift Agreements must accompany all gifts and pledges over \$25,000.
- B. The Director of Advancement Services forwards fully executed gift agreements to the Office of the Vice President for Finance and stores them in Development's Gift Agreement Library in Microsoft SharePoint. In addition, Advancement Services provide a monthly reconciliation report of pledges and pledge payments.
- C. Written revocable pledges are recorded on a formal pledge agreement or, depending on the circumstances, based on a letter or email from the donor. The Advancement Services will forward a copy of such agreements to the Donor's Gift Officer and save them in Development's Gift Agreement Library on Microsoft SharePoint account.
- D. Verbal pledges are recorded based on a conversation with the donor and followed up by a written communication to the donor confirming the conversation. These communications should be kept in the Advancement CRM, Microsoft SharePoint or donor files.

- E. Pledge payments may be larger than scheduled. Any overage will be applied to reduce the pledge. If the final payment against a pledge will cause the sum of all payments to exceed the originally pledged amount, the payment will be accepted without requiring a modification to the pledged amount.
- F. If the donor specifically indicates they are increasing their pledge, the pledge record must be modified in writing and, if necessary, rescheduled. However, if the donor indicates they wish to establish a new pledge with the excess payment, a new pledge must be created and the payment split accordingly.

G. Pledge Collection

Whittier College recognizes the importance of maintaining transparent and accurate financial records during fundraising campaigns, including the management of pledge write-offs. These are pledges that, for various reasons, the College may be unable to collect. Whittier College has adopted the following approach:

H. Campaign Reporting of Write-offs

1. Whittier College will deduct pledge write-offs from the campaign totals. This approach ensures that the campaign reflects only secured funds and provides a realistic picture of the College's progress toward its campaign goals.
2. Write-offs will be recorded separately in internal management reports, enabling the College to track pledge fulfillment rates and maintain transparency with donors, staff, and stakeholders.
3. Decisions regarding pledge write-offs will be made collaboratively with the Vice President of Development and Vice President for Finance and Chief Financial Officer

I. Gifts In Arrears

1. Each month, Advancement Services will advise Gift Officers of their donors who have pledge payments due the following month or are in arrears. By agreement, either the Gift Officer or the Associate Vice President of Development will send a courtesy reminder. This will occur as long as there is an outstanding balance on the pledge.
2. At 180 days in arrears, the Associate Vice President of Development will advise the Vice President of Development who will recommend a course of action.
3. While the College makes every effort to accommodate donors, up to and including amending their pledge agreements, the Board of Trustees may consider removing the donor's name from a building/fund/plaque or other such remedies if the Pledge kept in the CRM donor files obligation is not met.

VII. Restricted Funds

Restricted Funds are gifts for current operations intended by the donor for a specific purpose. Written documentation of the donor's intent is required. Depending on the circumstances, the documentation may be a formal gift or pledge agreement, a memorandum of understanding, a letter, or, in rare cases, an email.

VIII. Endowed Funds

Endowments are permanently restricted funds. A fully executed Irrevocable Gift Agreement is necessary to establish an endowed fund for a new purpose. Those formal agreements provide specific language governing endowments.

IX. Legal (Hard) and Soft Credit

Legal or "hard" credit is given to the donor who owned the contributed asset. This is typically the organization or person who last had custody of the donated funds. "Soft" credit is given to show affiliation with a gift. Soft credit donors *may not* take the charitable deduction. For example, if a donor's company makes a matching gift, the donor may receive "soft" credit for recommending the gift. Only the company would receive tax benefit for the gift. However, the donor affiliated with the company's gift may receive other recognition from the College for their involvement with the gift.

If soft credit is required, Advancement Services will create a soft credit record for every gift equal to the primary legal gift or pledge payment. The soft credit amount can be overridden to an amount less than the legal amount of the gift, but never in excess of the legal amount. The sum of all soft credits associated with a single gift may exceed the legal amount. However, the sum will not be less than the legal amount.

X. Modification of Gifts and Pledges

- A. An existing written pledge agreement or pledge payment schedule may only be modified by a formal amendment to the original agreement. All amendments must be approved by the Associate Vice President of Development and signed by the Vice President of Development before being presented to the donor.
 - 1. If the total of the pledge or outstanding pledge payments is less than \$1,000,000, the Vice President of Development may approve the amendment.
 - 2. If the total of the pledge or outstanding pledge payments is over \$1,000,000, the approval of the PAC is required.
 - 3. If the total of the pledge or outstanding pledge payments is more than \$3,000,000, the approval of the Executive Committee of the Board of Trustees is required.

B. Exceptions to this are

1. The annual write-offs of uncollectible Whittier Fund pledges or errors corrected by Advancement Services.
2. Pledges that are deemed uncollectible and the balance outstanding is \$5,000 or more need the approval of the Vice President of Development and the Finance Office. Either office may initiate a written request.
3. Soft pledge and gift amounts may be modified only when a request from the donor is received in writing.

XI. Processing Gifts by Payment Type

A. Cash/Check

If a donor mails cash or a check without proper documentation or note of designation for the gift, Gift Officers will contact the donor and provide the Advancement Services with the cash or check and a completed Internal Donation Form.

B. Wire Transfers

Cash gifts may be wired to the College. Donors may wire cash to:

Bank Information

Bank Routing Number:	322271627
SWIFT Code:	CHASUS33
General Bank Reference Address:	JPMorgan Chase, New York, NY 10017
Account Number:	800003021375
Account Name:	Whittier College (General Account)

Beneficiary Information

13406 Philadelphia Street
P.O. Box 634
Whittier, CA 90608

ATTN: Office of Business and Finance

C. Credit Cards

The College accepts VISA, MasterCard, Discover Card and American Express for gifts. Advancement Services must receive the donor's name as it appears on the credit card, the donor's billing address, the credit card number, expiration date, and the amount to

process. It is not necessary to be in possession of the credit card. Whittier College strictly complies with PCI Data Security Standards. If a Gift Officer takes the credit card, they will complete an Internal Donation Form and hand both the card information and form to Advancement Services. Extreme care is taken to ensure that the credit card information remains secure. Credit card information is immediately shredded. It is never transmitted via email, text, fax, scanner or other electronic means.

D. Payroll Deduction

Whittier employees may make charitable contributions to the College by payroll deduction at any time during their employment.

- The employee contacts Advancement Services to set up the deduction.
- The deductions will occur every pay period for the specified time or amount.
- The amount can be changed, and the deduction can be stopped at any time by contacting Advancement Services

E. Gifts of Publicly Traded Stocks

Publicly traded stocks, shares of stock in closely held companies, bonds, and government issues may be given to Whittier College. Advancement Services receives notification of incoming stock from Wells Fargo Advisors.

The date of receipt of the stock in Whittier College's account by Wells Fargo Advisors is to be the date used for valuation purposes.

Advancement Services provides valuation of stock, prepares the Security Receipt Record Form with gift valuation for approval and signature by the Vice President of Development. Once approved, gifts of stock are recorded. The value of the gift will be the mean of the highest and lowest selling prices quoted for the stock on the date of the gift. It may be expected that such securities will be immediately sold by the College.

In no event shall an employee or volunteer working on behalf of the College commit to a donor that a particular security will be held by the College unless authorized to do so by the PAC.

F. Gifts of Securities

Publicly traded securities, shares of stock in closely held companies, bonds, and government issues may be given to Whittier College. Gifts of securities may be made by sending the certificate and an executed stock power for each separate issue of stock or bond to: Office of Development Whittier College 13406 E. Philadelphia Street P. O. Box 634 Whittier, California 90608-0634

1. Publicly Traded Securities

These are securities regularly traded on a public stock exchange. The value of the gift will be the mean of the highest and lowest selling prices quoted for the stock on the date of the gift, as defined below. It may be expected that such securities will be immediately sold by the College. In no event shall an employee or volunteer working on behalf of the College commit to a donor that a particular security will be held by the College unless authorized to do so by the Philanthropic Acceptance Committee.

2. Closely Held Securities

These are shares of stock in entities which have been organized for profit-making purposes and are rarely traded on stock exchanges. Donors may give shares of closely held corporate securities to Whittier College in the same manner as publicly traded securities. However, because closely held stock is not publicly traded, these securities present special concerns. To convert them into cash, Whittier College must own the securities. Whenever donors estimate their gifts of closely held corporate securities at \$10,000 or more, they must obtain a written appraisal by a qualified independent appraiser. Gifts of closely held securities may only be accepted and disposed of by the Philanthropic Acceptance Committee after review by legal counsel.

3. Methods of Delivery of Gifts of Securities

- A. If securities are hand-delivered to Whittier College, the value of the gift will be the mean of its fair market value on the date of delivery. Donors should endorse stock certificates only upon delivery to Whittier College. For securities which are hand-delivered, the gift date is the day the securities are delivered to Whittier College.
- B. If the securities are mailed to Whittier College, the value of the gift will be its fair market value on the date the securities were mailed. Donors should obtain a stock power from their banker or broker, signing their name exactly as it appears on the certificates, and have their signature guaranteed by their banker or broker. The stock power and a letter of instruction should be mailed to the College under separate cover from the stock certificate(s). Whittier College should be designated on the stock certificate(s), stock power, or related instruments of transfer as "Whittier College." The stock certificate(s) should be sent by registered mail, return receipt requested, to Whittier College. Unendorsed stock certificates are non-negotiable. The postmark date on the stock power will be used as the gift date when the stock certificate and stock power are mailed under separate covers.

- C. Securities may also be transferred electronically to the College by donors with assistance from their stockbroker.

Send to: Wells Fargo Advisors L.L.C. c/o Mr. Ryan P. Hawkins,
CFP Vice President for Investments
2400 E. Katella Ave., Suite 1000
Anaheim, CA 92806-5945
Tel. (714) 940-3100
Fax (714) 456-9144
D.T.C. #141 Whittier College Account #8313-6985
College Tax I.D. #95-1644048

The date of receipt of the stock in Whittier College's account is generally considered to be the date of the gift for valuation purposes.

For each gift of securities, the donor is required to provide the College a written description of the gifted securities and a statement of intent as to the College's use of the funds.

4. Non-Traditional Investments

Whittier College may accept gifts of non-traditional investments, such as partnership interests, after a thorough review of the following factors: a) marketability b) nature of any applicable restrictions c) legal and other liabilities associated with the asset d) carrying costs such as administrative and legal fees e) exposure to unrelated business income tax liability.

5. Non-Traditional Investments

Whittier College may accept gifts of non-traditional investments, such as partnership interests, after a thorough review of the following factors.

- Marketability
- Nature of any applicable restrictions
- Legal and other liabilities associated with the asset.
- Carrying costs such as administrative and legal fees
- Exposure to unrelated business income tax liability

6. Mutual Funds

Because Mutual Funds cannot be electronically transferred, and it may take two to six weeks to complete the transaction. The Office of the Vice President for Finance should be contacted to provide necessary instructions.

G. Tangible Personal Property

Whittier College may accept gifts of tangible personal property, including works of art, jewelry, antiques, collections, automobiles, manuscripts, and books. Such gifts may be accepted only after a thorough review indicates the property is readily marketable or may be used by the College in a manner consistent with one of the purposes for which it was granted status. Prospective donors should be advised that Whittier College reserves the right to sell or otherwise dispose of the personal property in question, if such action is financially advisable or necessary.

1. No personal property shall be accepted that obligates the College to ownership in perpetuity.
2. No perishable property or property which shall require special facilities or security to properly safeguard it will be accepted without approval of the PAC.
3. Only the PAC or persons authorized by the Committee to do so, may represent to a donor that property will or will not be held by the College for a requisite period of time or for purposes related to its tax-exempt status.
4. Donors should be notified at the time of receipt of a gift that the College will, as a matter of corporate policy, cooperate fully in all matters related to IRS investigations of non-cash charitable gifts.
5. If Whittier College intends to sell a gift immediately, rather than use it, the donor must be informed that IRS rules may limit the amount of the charitable deduction to the donor's cost basis.
6. Whenever donors estimate their gifts of tangible personal property at \$5,000 or more, they must obtain a written appraisal by a qualified independent appraiser. The gift in kind form must be used to document this gift.
7. The College cannot appraise or assign valuation to gifts of tangible property. Such gifts may only be accepted after receipt and review by the PAC, or those empowered to act on its behalf, of an appraisal qualified under terms of the Internal Revenue Code governing gifts of property of this type.
8. Disposition of donated property within one year of the gift. This provision only applies to donations valued at \$5,000 or more where Whittier College signed IRS Form 8283 on behalf of the donor. According to the Pension Protection Act of 2006, Gifts-in-Kind may be deducted by the donor at the fair market value only if Whittier

College uses the gift in furtherance of its tax-exempt purposes. If the College disposes of the donated property within the year of the gift, a letter signed by an officer of the College must be sent informing the donor that the property has been disposed of with one of the qualifications below.

9. Disposition of the property after year one, but prior to the end of year three following the gift. This provision only applies if the original donation was valued at \$5,000 or more and Whittier College signed IRS Form 8283 on behalf of the donor. If Whittier College disposes of the property after the first year of the donation, but before the end of year three following the gift, a letter must be sent to the donor with one of the qualifications below.
10. If the property could still have been used for Whittier College's tax-exempt purpose, the donor must include as ordinary income the difference between the cost basis of the gift and the deduction claimed, OR
11. If the property's use becomes impossible or infeasible, the letter must indicate the property's disposition, the reason, and that the donor may still take a deduction.
12. Penalty for misidentification of property use. Under The Pension Protection Act of 2006, donors face a penalty of \$10,000 if they identify property as having a related use to Whittier College if they know that it is not intended for that purpose (for example, if they know at the time of donation that Whittier College intends to sell the property). If the College sells, exchanges or trades appraised property for which it signed an appraisal summary (IRS Form 8283) within three years of the gift date, The College must file IRS Form 8282 within 125 days of the date of sale or disposition of the asset.

H. Bargain Sales

A bargain sale is a sale of property to the College for less than its fair market value. The bargain sale price may be any amount mutually acceptable to the College and donor. Some donors are willing to sell their property for an amount equal to their cost basis. Then they recover their investment and receive a charitable deduction for the appreciated portion. College funds will not be invested to acquire a bargain sale gift.

I. Other Property

Other property of any description including mortgages, notes, copyrights, royalties, easements, whether real or personal, shall only be accepted by action of the Philanthropic Acceptance Committee or persons duly acting on its behalf.

J. Closely Held Stocks, Oil, Gas or Mineral Interests

After review according to the policy for High-Risk Gifts, the deed, appraisal, and description are forwarded to the Office of Finance for valuation and entry on the general ledger. A Gift-in-Kind form must also be forwarded to Office of Finance.

The Office of Finance will provide valuation to Advancement Services for processing.

When the donor provides IRS Form 8283, The Associate Vice President, Development Operations and Services will ensure the form is signed by the Vice President of Development and returned to the donor.

K. Legacy/Planned Gifts

Planned gifts may be either deferred or outright. They involve the transfer of substantial assets which affect the distribution of the donor's estate. These gifts do not immediately confer institutional ownership and generally are not taken out of current earnings.

The College may serve as sole trustee or co-trustee of any deferred gift which requires the appointment of a fiduciary, except as prohibited by the Philanthropic Acceptance Committee.

The College may share in the charitable interest with another charity. The program supplements and enhances the overall development programs of the College by:

- Offering opportunities to make gifts during a donor's lifetime to those who desire to retain some income from their capital for themselves and their beneficiaries.
- Enabling donors to make larger gifts during their lifetime than could normally be made.
- Encouraging estate planning by offering lifetime and testamentary gift opportunities available under existing tax laws.

In order to establish a charitable trust for the benefit of the College, a written trust agreement is required.

All agreements entered into by the College shall be reported to the PAC.

All agreements and other documents related to planned gifts should be reviewed by the donor and their tax and legal counsel before a gift is accepted by the College.

The College shall advise donors in writing to engage in such review.

Some of the acceptable methods of creating deferred gifts to Whittier College are described below.

1. Bequest in Will and Living Trust

a. Description

- I. A bequest is a gift of any amount or form made to Whittier College in a donor's will or living trust. Bequests may provide for a specific dollar amount in cash, specific securities, and specific articles of tangible personal property or a percentage of the residue of the estate.
- ii. Bequests may be given as unrestricted or restricted gifts. Unrestricted bequests are used for the general purposes of the College and can be applied to current needs. A named unrestricted endowment fund may be established as indicated in the above section on "Outright Gifts." The Philanthropic Acceptance Committee will designate the purpose and use of such a gift. A restricted bequest supports a certain purpose of program designated by the donor. Such a fund may be established as indicated in the section on "Outright Gifts." A gift in any amount may be accepted as a contribution to an existing fund earmarked for a specific need of the College so long as the terms and conditions of the existing fund so permit.
- iii. Among donor options are residuary and contingent bequests. A residuary bequest will give Whittier College all or a portion of the estate after all debts, taxes, expenses, and all other bequests have been paid. A contingent bequest will ensure that, despite unforeseen circumstances, specified property will pass to Whittier College rather than unintended beneficiaries.
- iv. Donors may also establish, by bequest, an annuity trust or unitrust. The bequest can be arranged so as to provide a life income for a designated beneficiary by directing that the bequest be used to establish a charitable remainder annuity trust or charitable remainder unitrust. If such a gift is made by will, the principal will pass to Whittier College only after the death of the life income beneficiary.

b. Policy

- I. Gifts may be made to Whittier College through the execution of a new will or living trust, or addition through a codicil or otherwise, to an existing will or living trust. Donors may also add either a residual or contingent codicil to their wills.

- ii. For any undesignated bequest with a gift value of less than \$500,000, the President of the College shall consult with the Vice President of Finance and Administration, and the Vice President of Development to determine gift designation(s). For any undesignated bequest with a gift value of \$500,000 or more, the Philanthropic Acceptance Committee shall determine and approve the designation of such gifts in collaboration with staff, namely the College President, Vice President of Finance and Administration, and Vice President of Development. The remainder shall be allocated as determined by the Board, which is strongly encouraged to allocate a minimum of one-half to quasi-endowment.
- iii. Donors are encouraged to recognize that over the many years following the establishment of an endowment, the needs, policies and circumstances of Whittier College can change in unforeseen ways. The Whittier College administration must have the flexibility to make use of the funds in the best interest of the institution and in accord with donor interests and specification. Thus, donors are advised to describe the specific purposes of their gifts as broadly as possible and to avoid detailed limitations and restriction. Donors considering bequests for a specific purpose are encouraged to consult the Office of Development. The inclusion of a flexibility clause similar to the clause in the section on “Endowment Funds” is most desirable.
- iv. Gifts from estates of deceased donors consisting of property which is not acceptable may be rejected by action of the Philanthropic Acceptance Committee. The legal counsel of Whittier College shall expeditiously communicate the decision of the Philanthropic Acceptance Committee to the legal representatives of the estate. If there is any indication that the representatives of the estate or any family member of the deceased is dissatisfied with the decision of the Philanthropic Acceptance Committee, this fact should be communicated to the Committee as quickly as possible.
- v. Bequests shall be valued at fair market value at the time the College’s portion of the estate is distributed. Living trusts shall be valued at fair market value at the time the trust is funded.

2. The Charitable Gift Annuity

a. Description

- I. In return for an irrevocable gift of money, securities, or real property, Whittier College will pay the donor and/or beneficiary a guaranteed rate of annual income for life/. The annuity is secured by all of the College assets and the rate of return is determined by the age of the donor and/or beneficiary at the time of the gift.

A portion of the annual payment is tax-free income to the donor, being considered return of principal. Since the charitable gift annuity is part gift and part purchase of an annuity, the donor is allowed a sizable income tax deduction in the year established.

- ii. When appreciated property is donated, capital gain will be taxed to the donor; however, the taxable gain may be reported in equal installments over the life expectancy of the donor
- iii. The Uniform Annuity Rates as recommended by the American Council on Gift Annuities, an association of more than six hundred institutions of charitable and philanthropic nature, are computed on the basis of approximately fifty percent (50%) of the market value of each gift being available to the College at the death of the last annuitant. Rates are prepared tri-annually by an actuarial firm.

b. Policy

- i. The Uniform Annuity Rates, as recommended by the American Council on Gift Annuities, will be used unless an exception is made by the Philanthropic Acceptance Committee.
- ii. If appreciated property is offered by the donor, the Gift Officer must inform the donor as to what portion of the gain is taxable to him/her and recommend that the donor consult his/her tax advisor before the agreement is signed.
- iii. The minimum gift for an annuity agreement is \$10,000. The Charitable Gift Annuity shall be valued at its fair market value at the time of the gift.
- iv. Gifts may be placed in a pool of investment funds of the College, which is managed by professional investment counsel, appointed and supervised by the Board of Trustees through the Investment Committee.
- v. Agreements may provide for a maximum of two beneficiaries.
- vi. The minimum age for a beneficiary will normally be 55 years.
- vii. At the death of the last annuitant, the principal is removed from the College's investment pool and released for college purposes as designated by the donor.
- viii. The Charitable gift portion must be at least ten percent (10%) of the fair market value of the gift.
- ix. Annuity agreements shall be written in conformity with the provisions of the California Insurance Code and reported to the Commissioner of Insurance.

3. Deferred Charitable Gift Annuity

a. Description

The Deferred Charitable Gift Annuity is essentially the same as the Charitable Gift Annuity with the exception that the payments to the annuitant or beneficiary are postponed until a later date stated in the agreement. The maximum deferral period is 20 years.

b. Policy

Generally, the same policies would be effective as applicable to the Charitable Gift Annuity.

4. Charitable Remainder Unitrust

a. Description

- i.** The primary feature of a charitable remainder unitrust is that it provides for period payment of income to the donor, or another person specified by the donor, for life or a specified term of years, after which the trust assets pass to Whittier College. Only assets of the trust may be used to satisfy the commitment to the donor; assets of the College are not involved.
- ii.** During the lifetime of the donor, he or she creates a formal trust agreement under which assets such as cash, appreciated securities, or both are irrevocably transferred to a trustee (a bank or Whittier College) who then pays the donor, or a person specified by the donor, an income for life.
- iii.** During the donor's lifetime, the trust assets are managed and invested by the trustee as a single fund. The donor cannot borrow or otherwise deal with the trust assets. The designated beneficiary receives payments based on a fixed percentage of the net fair market value of the trust as valued annually by the Philanthropic Acceptance Committee. The donor determines the fixed percentage, which may not be less than five percent, upon creation of the unitrust. Donors may make subsequent additions to the unitrust during their lifetime or by bequest upon their death.
- iv.** Three types of unitrust may be considered:
 - **Standard Unitrust**

This basic form of unitrust provides for payment to the donor and/or beneficiary monthly, quarterly, semi-annually, or annually an amount equal to a set percentage of fair market value of the assets of the trust, valued

annually. The percentage is determined at the time the trust is created, is stated in the trust, and is irrevocable. If annual income and/or capital gain does not equal the committed percentage, principal is used to make up the difference; if there is an excess, it is added to the principal.

- Net Income Unitrust

A variation of the basic unitrust may be used if agreed upon by the donor and the College. When the trust is created, and if stated in the agreement, provision may be made for payment each year of net income only. The donor receives the lesser of the stated percentage, or the net income earned. In a Net Income Unitrust with Make-Up provision, the trust pays net income if it earns less than the stated percentage payout. If it earns more than the stated percentage in the later years, the trust will pay as much income as necessary to bring prior payments up to the maximum amount that should have been paid in prior years had income been sufficient.

- Income Only Unitrust Another variation of the basic unitrust, if agreed to by the donor and the College, may provide that income only, up to the stated percentage of the assets will be paid to the donor each year with no make-up in subsequent years for a prior deficiency. The excess in any year is added to principal.

b. Policy

- i. Particular care must be exercised in recommending the standard unitrust because of the danger of invasion of principal to the extent that the gift principal is drastically reduced.
- ii. Investment policy for a standard unitrust is to invest for growth in order to minimize the invasion of principal. For a net income unitrust, investment policy will be to maximize income up to the amount which may be paid to the beneficiary, as long as the safety of the principal is not jeopardized.
- iii. The holdings of each trust should be reviewed by the Investment Committee at least annually.
- iv. The minimum original gift for a Charitable Remainder Unitrust is \$100,000. The Charitable Remainder Unitrust shall be valued at its fair market value at the time of the gift.
- v. Charitable Remainder Unitrust Agreements may provide for only two beneficiaries.

- vi. The minimum age for a life beneficiary of a Charitable Remainder Unitrust normally will be 55 years.
- vii. At the death of the last beneficiary, the assets of the trust shall be released for use as provided in the trust agreement, or as determined by the Board of Trustees if no such provision is contained in the trust agreement.

5. Charitable Remainder Annuity Trust

a. Description

- I. The annuity trust shares many common features with the unitrust, the principal difference being the manner used to calculate the payment to the income beneficiary. Whereas the unitrust provides for a payout that varies with each annual valuation, the annuity trust provides for fixed payments based upon the fair market value on the date the trust is established. Another difference is that additional contributions cannot be made to an annuity trust.
- ii. The donor during his or her lifetime irrevocably transfers assets to a trustee, who pays the donor, or a person specified by the donor, a fixed dollar amount annually for life. This must at least equal five percent (5%) of the fair market value of the assets placed in the trust when it is created. The investment Committee shall set the maximum allowable annuity rate on a semi-annual basis. The trust can also provide income for the donor's survivors for life; however, the trust assets become the sole property of Whittier College. Income in excess of the annual payment is added to the principal. If the income in any one-year is less than the annual payment, the difference comes from the principal.
- iii. Only the assets of the trust back the commitment to the beneficiary; other assets of the College are not involved.

b. Policy

- I. The holdings of each trust are to be reviewed by the Investment Committee at least annually.
- ii. The minimum age of the beneficiary of a Charitable Remainder Annuity Trust normally will be 55 years.
- iii. Charitable Remainder Annuity Trust agreements may provide for a maximum of two beneficiaries.

- iv. The minimum gift for a Charitable Remainder Annuity Trust is \$100,000. The Charitable Remainder Annuity Trust shall be valued at its fair market value at the time of the gift.
- v. At the death of the last beneficiary, the assets of the trust shall be released for use as provided in the trust agreement, or as determined by the Board of Trustees if no such provision is contained in the trust agreement.

6. Charitable Lead Trust

a. Description

- i. The primary feature of a charitable lead trust is that it provides for the immediate support of Whittier College through income generated by the assets in trust for a set period of time, after which the assets pass to a non-charitable beneficiary such as the donor, the donor's children, or other persons the donor specifies. Thus, a charitable lead trust is conceptually the opposite of a charitable remainder trust. In a lead trust, the donor gives Whittier College the current economic benefit of the transferred assets and retains the right to require possession and control of the assets at a future date.
- ii. The donor during his or her lifetime creates an irrevocable trust agreement for a period of years. The agreement may take effect during the donor's lifetime or be part of the donor's will. A charitable lead trust may be advantageous for donors who have a larger income than they currently need and who desire to transfer assets to heirs.

b. Policy

Assets are transferred to a trustee, with the stipulation that the income from the assets be paid to Whittier College for the life of the trust, after which the principal of the trust reverts back to the donor or others of his or her choosing. The income interest for the charity must be in the form of an annuity or a fixed percentage of the value of the trust property determined annually. The Charitable Lead Trust shall be valued at its fair market value at the time of the gift.

7. Pooled Income Fund

a. Description

- i. The Whittier College Pooled Income Fund currently operates under a trust agreement in which a bank, trust or investment company serves as trustee. Gifts to the Fund will be governed by that trust agreement and gift agreement between the College and the donor. Currently, Clifford Associates of Pasadena,

California, is acting as Trustee for the Pooled Income Fund. The Fund is, therefore, exempt from Finance Office management responsibilities.

- ii. The investment objective of the Fund is to generate the maximum current income for the benefit of the donors, while observing sound investment practice.
- iii. The Trustee may invest the assets of the Fund in any type of property wasting assets. However, it is anticipated that the Fund generally will be invested in common trust funds managed by the Trustee.
- iv. Each gift to the Fund results in the creation of two distinct interests: an income interest for designated beneficiaries and a remainder interest, the underlying assets, irrevocably dedicated to Whittier College.
- v. On the basis of the gift, each of the designated beneficiaries will be assigned units representing proportionate shares of the Fund's net income.
- vi. All income received in the Fund during the year, not including capital gains or stock dividends, which are added to the Trust principal, must be paid out to donors during the same year on the basis of units held by each. Income is paid to new donors from date of gift. Only income is paid; there shall be no invasion of principal, and the assets of the College are not committed.

b. Policy

- i. If a potential gift is exceedingly large relative to the total value of the Fund, a separate trust shall be recommended to the donor to avoid major disturbances of the income flow to previous donors.
- ii. All gifts to the Pooled Income Fund are irrevocable.
- iii. Net income of the Fund will be paid to beneficiaries in proportion to the number of units assigned to the gift to the Fund. Net income will be paid out quarterly to designated beneficiaries. Since the Fund uses a calendar year, these quarters end on the last day of March, June, September and December. If less than the total net income was paid during the year, and adjusting payment will be made within 65 days after the close of each calendar year.
- iv. Tax-exempt bonds shall not be purchased by or retained in the Fund.
- v. The trustee shall submit periodic reports of the pooled fund assets to the Investment Committee.

- vi. The minimum gift to the pool is \$5,000, with allowable subsequent gifts of \$1,000. The gift to the Pool shall be valued at its fair market value at the time of the gift.
- vii. Pooled Income Fund agreements may provide for a maximum of two beneficiaries. (8) The minimum age of beneficiaries of a Pooled Income Fund agreement normally will be 45 years.
- viii. At the death of the last beneficiary, the units involved shall be valued and that amount removed from the Fund to be used as provided for in the trust agreement, or as designated by the Board of Trustees if the agreement contains no such provision.

8. Gifts of Life Insurance

Life insurance can be a vehicle for giving funds to Whittier College. With it, the donor can make a substantial gift with a relatively modest annual outlay. For instance, a donor may irrevocably assign to Whittier College an existing life insurance policy that is no longer needed for family protection, making the College both the policy owner and the beneficiary. The College prefers that the donor continue to pay the premiums, which may be tax deductible, after making the gift. If the donor does not choose to continue paying the premiums, the College may elect to:

- a. Continue paying the premiums and receive the full-face value of the policy at the donor's death
- b. Convert the policy to paid-up insurance in a reduced amount with no further payments
- c. Surrender the policy for its present cash value
- d. Before contributing gift of life insurance to Whittier College, donors should consult with the Office of Development to ensure that their gift will be consistent with the College's policies and needs.

9. Gift of a Remainder Interest in a Personal Residence or Farm

a. Description

A donor can give a remainder interest in a personal residence, such as a home or condominium or a farm to Whittier College. The donor or other occupants may continue to occupy the residence or operate the farm without disruption for the duration of the donor's life. Thereafter, the residence or farm will either be sold or used by Whittier College for purposes specified by the donor, if any. The procedures for evaluating

proposed gifts of real property, as outlined above, also apply to gifts of a remainder interest in property.

b. Policy

If a life estate is retained in the property, expenses for maintenance, insurance, real estate taxes, other expenses, and any indebtedness relating to the property are to be borne by the donor or the primary beneficiary.

J. Model Standards of Practice for the Charitable Gift Planner

The following standards of practice have been adopted by Whittier College:

1. Primacy of Philanthropic Motivation

The principal basis for making a charitable gift should be a desire on the part of the donor to support the work of higher education.

2. Explanation of Tax Implications

Congress has provided tax incentives for charitable giving, and the emphasis in this statement on philanthropic motivation in no way minimizes the necessity and appropriateness of a full and accurate explanation by the Gift Planner of those incentives and their implications.

3. Full Disclosure

It is essential to the gift planning process that the role and relationships of all parties involved, including how and by whom each is compensated, be fully disclosed to the donor.

4. Compensation

Compensation paid to Gift Planners shall be reasonable and proportionate to the services provided. Payments of finder's fees, commissions, or other fees by a donor organization to an independent Gift Planner as a condition for the delivery of a gift are never appropriate. Such payments lead to abusive practices and may violate certain state and federal regulations. Likewise, commission-based compensation for Gift Planners who are employed by a charitable institution is never appropriate.

5. Competence and Professionalism

The Gift Planner should strive to achieve and maintain a high degree of competence in his or her chosen area and shall advise donors only in the areas in which he or she is professionally qualified. It is a hallmark of professionalism for Gift Planners that they realize when they have reached the limits of their knowledge and expertise, and as a result, should include other professionals in the process. Such relationships should be characterized by courtesy, tact and mutual respect.

6. Consultation and Independent Advisors

A Gift Planner acting on behalf of a nonprofit organization shall in all cases strongly encourage the donor to discuss the proposed gift with competent independent legal and tax advisers of the donor's choice.

Although Gift Planners frequently and properly counsel donors concerning specific charitable gifts without the prior knowledge or approval of the donor organization, the Gift Planner, in order to ensure that the gift will accomplish the donor's objectives, should encourage them early in the gift planning process to discuss the proposed gift with the charity to whom the gift is to be made. In cases where the donor desires anonymity, the Gift Planner shall endeavor on behalf of the undisclosed donor, to obtain the charity's input in the gift planning process.

7. Explanation of Gift

The Gift Planner shall make every effort, insofar as possible, to ensure that the donor receives a full and accurate explanation of all aspects of the proposed charitable gift.

8. Full Compliance

A Gift Planner shall fully comply with and shall encourage other parties in the gift planning process to fully comply with both the letter and the spirit of all applicable federal and state laws and regulations.

9. Public Trust

Gift Planners shall, in all dealings with donors, institutions, and other professionals, act with fairness, honesty, integrity and openness. Except for compensation received for services, the terms of which have been disclosed to the donor, they shall have no vested interest that could result in personal gain.

K. Responsibilities of College Parties in Managing Legacy Gifts

1. Responsibilities of Gift Officers

- A. Consult and aid on all donor correspondence and visits from other College staff members that include discussion of legacy planning.
- B. Negotiate the terms of the gift, including computation and reporting tax consequences and all necessary arrangements with the donor.
- C. Specifically request the following information about each legacy gift donor:
 - Fund or trust name.
 - Names and addresses of donor(s) and beneficiaries together with their relationships
 - Names and addresses of the donor advisory team, including attorney, accountant, bank, professional advisors or agents as appropriate for recording and reporting purposes.
 - Birth dates and Social Security numbers of donor(s) and all beneficiaries as required for tax computation and fiduciary reports.
 - Tax calculation forms and reports.
 - The nature of the gift property for tax and payout purposes
 - Cost basis, holding period and means of acquisition of the property.
 - Dates of transfer, valuations, dates and methods, payment dates, fiscal year and type of agreement
 - Special considerations such as type and timing of income, preferred tax treatment of income or special investment objectives
 - Ultimate designation of use of funds at termination of the income beneficiary/ies' interests.

2. Board of Trustees Responsibilities

The Board of Trustees, through its Investment Committee shall:

- Establish investment policies for the various types of funds and trust accounts.
- Monitor the performance of the investment managers.
- Comply with regulations for trustees where applicable.

L. Administration of Probate Gifts

1. All documents and notices regarding a bequest gift in probate shall go to the Associate Vice President of Development Operations and Services and monitored/saved in the Development Office Donor Files.
2. All communication with the family and executor shall be made by the assigned Gift Officer and involve the Vice President of Development if the benefactor was a board member.
3. Outside legal counsel shall be engaged as needed to manage the probate or appeals process on any estate gifts.

M. Substantiating Gift Values

Appraisals

Gifts of real and personal property (tangible or intangible) are reported at fair market value regardless of the value the donor may be able to take as a charitable deduction. IRS requirements for gift substantiation note that the donor is responsible for independently valuing property for tax- deduction purposes. IRS Publication 561 [<https://www.irs.gov/pub/irs-pdf/p561.pdf>] explains the responsibility of donors and appraisers in determining the value of contributed property. IRS Publication 1771 [<https://www.irs.gov/pub/irs-pdf/p1771.pdf>] further states that the institution's receipts to donors should only describe, and not value these contributions.

In those instances when the donor is not required to provide an appraisal (for example, if the donor is the creator of a piece of donated artwork, in which case the donor's deduction is limited to the cost of materials), or the donor does not intend to claim a deduction or refuses to provide the appraisal (they are not legally obligated to do so), the institution should make an effort to obtain a reasonable value estimate from an independent third party or through research of similar sales. Depending on the circumstances the Finance Office may not accept this value for asset recording purposes, but that does not stop the development office from counting these estimates in their fund-raising totals.

Count gifts of \$5,000 and less in any of the following ways:

- The value placed on the gift by a qualified independent appraiser. While not necessary for IRS purposes, the donor may nonetheless obtain such an appraisal.
- The value declared by the donor. In this case, Whittier requires the donor to provide a copy of either (1) the paid bill of sale or (2) the invoice and a copy of the check or personal credit card statement showing payment. Sales tax is not included in the gift's value.
- The value determined by a qualified expert on the faculty or staff of the institution, but not an individual whose fundraising totals are directly affected by the gift.

N. Premium Value Gifts (Quid Pro Quo Rule)

Premium value (quid pro quo) is not allowed in exchange for gifts from an IRA or Roth IRA or donor advised funds. For example, a donor may not pay for an event dinner with funds from his or her IRA, Roth IRA or donor advised fund.

Receipts for contributions made to Whittier College will reflect whether or not goods or services were provided in exchange for the contribution. Currently, the IRS has established provisions allowing for full deductibility of a contribution, even when *certain* goods and services were provided, if the contribution and goods and services meet certain criteria. The

limitations on such goods and services are detailed in IRS Publication 1771 and are subject to change on an annual basis.

O. Raffles

The Office of the Attorney General of the State of California has found that as an educational institution, Whittier College is exempt from filing, registration, and reporting provisions of Government Code section 12580, et seq. However, Whittier is subject to all other provisions under Penal Code 320.5, Charitable Raffles.

P. Auctions

Auctions may be held with the permission of the Vice President of Development. Donated items to be offered in the auction are accepted and processed as any other tangible personal property/gift-in-kind. During the auction, the fair market value of the item offered will be clearly presented. If the purchase price of the auctioned item is more than the stated fair market value, then a gift receipt for the difference will be generated. If the purchase price is equal to or less than the stated fair market value, it is not considered a gift, and a gift receipt will not be issued. If a fair market value cannot be established, whatever the buyer is willing to pay becomes the fair market value and there is no charitable gift.

Q. Payment of Fees and Costs

1. The donor normally is responsible for paying all costs required by the College to accept a gift (e.g. appraisal fees, insurance premiums).
2. Upon request of the donor, the College may pay reasonable fees for appraisals of real property, legal services or administration costs of trusts, charitable gift annuities or estate gifts. Payment of such fees must be approved by the Vice President, Chief Financial Officer

R. Special Fees

- **Finder's Fees**

In accordance with the Model Standards of Practice for the Charitable Gift Planner endorsed by the National Committee on Planned Giving, Whittier College will not pay compensation of any kind, including finders' fees, to commission-based gift planners or others who are not employed by the College.

- **Donor's Legal or Appraisal Fees**

Upon request of the donor and with the subsequent approval of the Vice President of Development and the Chief Financial Officer, the College may pay legal or appraisal fees on a case-by-case basis.

S. Investment of Donor Funds

Donors may be assured that their gifts will be invested in a manner consistent with the policies of Whittier College as outlined in the Investment Policies and Fiscal Policies of the Board of Trustees.

Donors may not direct that specific investments be made or direct that a specific investment manager be used.

T. Unrestricted, Deferred, Restricted or Endowed Gifts

1. The Board of Trustees reserves the right to redirect restricted or endowed funds, in consultation with the donor, if possible, if the original designated purpose for the gift is no longer possible or practical.
2. The Vice President of Development and Chief Financial Officer will approve allocation of unrestricted gifts so that it is consistent with the specified intent of the donor.
3. If the original gift was made by bequest or trust, the College may contact the trustee, executor or administrator for advice on where to redirect the funds.
4. All gift agreements shall contain language that clearly states to the donor that the College may redirect an estate gift if the original purpose can no longer be sustained and that the trustee, executor or administrator of estate gifts shall be consulted for advice on where to redirect the gift.
5. The Board of Trustees must designate the use of any estate unrestricted gift.
6. Significant realized bequests not otherwise restricted shall, at the direction of the Vice President of Development, be referred to the Board of Trustees through a formal resolution to be considered for endowment.

U. Holding Account

Occasionally a gift arrives, and the identity of the donor and/or the donor's intended use of the funds are not clear. In those cases, the Gift Recorder deposits the gift in a holding account until the donor and/or intent can be determined. Every effort will be made to resolve the holding account by June 30th of each fiscal year. Gifts put into the holding account close to the June 30th deadline will be granted an extension.

Other Restrictions

- Gifts may be sought only for purposes, positions and programs which are consistent with the academic goals and mission of the College.
- Whittier College is unable to accept gifts which are too restrictive in purpose or inconsistent with its stated academic purposes and priorities.
- Gifts Whittier College receives must not inhibit it from seeking gifts from other donors, be they similar or different, foreign or domestic. Further, no gift can be received which limits, beyond a general definition of subject area, the research that a faculty member or student can perform.
- Whittier College values and will protect its integrity, its independence, and the academic freedom of the College community. Gifts that may expose Whittier College to adverse publicity, require expenditures beyond the College's resources, or involve the College in unexpected responsibilities because of their source, conditions, or purposes will be referred to the Philanthropic Acceptance Committee.
- The PAC may withhold approval of acceptance, pending a review by faculty members or administrative personnel appointed for that purpose.
- Under other circumstances, the PAC delegates the authority to receive gifts and, in appropriate cases, receive gifts directly.
- Whittier College cannot accept gifts which involve unlawful discrimination based upon race, religion, sex, age, national origin, color, handicap, or any other basis prohibited by federal, state and local laws and regulations.
- Nor can Whittier College accept gifts which obligate it to violate any other applicable law or regulation, or which violate the College's bylaws.
- The Office of development strictly adheres to the Whittier College Data Use and Sharing policy, pasted at end of this document.

Development Data Sharing and Use Policy

I. Data Introduction

This policy governs the use and release of all information held by the Whittier College Office of Development about its alumni, donors, and supporters, including parents and other friends of the College. The College has full ownership and control of this information regardless of where the data may be located or in what format. This policy does not apply to any documents legally required to be shared with the public.

The Office of Development maintains a database of biographical and gift/pledge information about alumni and friends in accordance with the general needs and expectations of the College community. The information contained in this database is confidential and to be used solely for constituent relations, fundraising, or analytical purposes.

It is the desire of the Office of Development to support the ongoing activities of Whittier College by providing assistance for programs, communications, and events which bring together alumni, donors, and friends of the College. In order to provide the best possible service to those with legitimate needs for such information, and at the same time maintain the confidentiality of the information entrusted to us by our alumni, the following policies have been developed. These policies have been approved by the Assistant Vice President of Development and Vice President for Development and will apply to every request for information.

The Office of Development is responsible for ensuring that its designated volunteers use and distribute the information in the appropriate manner for its authorized function or activity and that the volunteers understand their responsibility to maintain the confidentiality of the information pursuant to these guidelines.

The Office of Development will not release the information to any individual unless that individual has a need to know, and that individual agrees in writing to maintain the confidentiality of the information pursuant to this policy and other applicable policies and procedures.

II. Alumni, Parent and Donor Records

Access to the alumni, parent and donor database is limited to staff authorized by the Office of Development. All users must read, sign, and comply with the "Confidentiality Agreement.". The confidentiality agreement must be signed and sent to the Office of Development before any data is released. The confidentiality agreement is for one-time use of lists for specific intended and agreed-upon purposes. A confidentiality agreement must be signed and submitted for each request made.

The Banner Advancement database is the central repository for constituent information, and no separate databases should be maintained on or off campus (e.g., Google Sheets, Excel). Information such as attendance, email responses, etc. can be tracked through different software but should not serve as a permanent or separate long-term database.

Correspondently, data that has been collected in separate databases by departments should be shared with the Office of Development so the database can be updated if necessary. This ensures that all campus areas have access to the most current and accurate information available and that alumni and donors' communication preferences are honored.

III. Alumni, Parent, and Donor Data Requests

A. *Who Can Submit a Request*

- Campus personnel (staff or faculty) may request reports, mailing, or email lists from the Banner Advancement database. Mailing or email lists will only contain information that is pertinent to the respective communication method and purpose of the request.
- A person or persons acting on behalf of college-affiliated organizations and alumni constituent groups, in support of approved activities (see list of approved activities below). Those organizations include but are not limited to:
 - Whittier College Affinity Alumni Association
 - Asian Pacific Islander Desi American (APIDA)
 - LGBTQIA+
 - Alianza de Los Amigos (Latinx)
 - Whittier College Black Alumni Association
 - Affinity Alumni and Regional Groups
 - Homecoming and Reunion Volunteers
 - Fundraising Volunteers
 - Administrative, academic, and athletic departments of Whittier College
 - Whittier College Center for Career and Professional Development
 - Whittier College Alumni Association Board of Directors and Committee Volunteers
- In cases of dispute about whether an organization has a legitimate affiliation with the College, the final decision will rest with the Vice President for Development or their designee.

If an individual requests contact information for another constituent, the requestor's contact information will be provided to the constituent, who will then choose whether or not to respond. Records coded as deceased, lost, and "do not contact" will always be excluded for all mail, email, and phone requests. Additionally, based on the method of communication (email, mail, phone, etc.) all associated exclusionary "do not contact" codes will be applied.

Federal law severely restricts the amount of information that may be released on current students. No information on students will, therefore, be released based on data maintained by the Office of Development. All requests for information on current students should be forwarded to the Office of the Registrar.

B. Submitting a Data Request and Confidentiality Agreement

Requests for alumni information must be made using the [Alumni, Parent & Donor Data Request Form](#). Requestors must provide the purpose and scope of the request such as the time period, the criteria, and the sample size of the data. The Director of Alumni Relations and/or Assistant Vice President of Development will review and approve appropriate requests. Information will only be provided after a Confidentiality Agreement is signed and obtained by the Director of Alumni Relations and/or Assistant Vice President of Development. All confidentiality agreements must be stored in the department's document storage system, Microsoft SharePoint. It is in the purview of the Director of Alumni Relations and/or Assistant Vice President of Development to request and review copies of communications. The Development Office can request copies of communications sent to members of the provided list. Similarly, the Office of Development can ask or require a timeline of potential communications to ensure that there is not significant overlap with our ongoing divisional communications.

A minimum of 14 calendar days must be allowed for requests to be reviewed, approved, and processed. Special consideration may be given to last-minute requests and will be evaluated based on available resources.

C. Release of Information According to Volunteer Role and Responsibilities

Only data that is necessary to fulfill the request/communication will be included. All data files will include database ID numbers where applicable. The following is information that may be released from the Office of Development:

Fundraising Volunteer

- Full Name
- Class Year
- Address
- Email Address
- Phone (Landline and/or Cell)
- Giving History
- Ratings
- Recent Gift Date
- Recent Gift Amount
- Recent Designation

The following is information that may be released from the Office of Alumni Relations:

Reunion Volunteer

- Full Name
- Class Year

- Address
- Email Address
- Phone (Landline and/or Cell)
- Degree Major
- Society
- Sports
- Student Activities
- Alumni Activities

D. Data Transfer and Storage

Information will only be shared in the form of lists and/or pdfs via the Development and Alumni Relations' Microsoft SharePoint account and avoid email attachments if at all possible. Files will be shared using the instructions contained in the Guidelines for Securely Sharing Data.

Volunteers may be provided with view and edit only" access to the data once they have agreed to comply with the guidelines. Lists should not be downloaded, recreated, duplicated, or manipulated for usage outside of the intended and agreed-upon usage. Volunteers may be provided with hard copies of information.

IV. Security and Compliance

It is the responsibility of the individual requesting and receiving the information to ensure that any electronic files or print documents are secure while in their possession and properly disposed of (i.e., deleted or shredded) immediately when the users are finished with them.

All files and materials shared with and used by volunteers and campus personnel must be retrieved by the Office of Development and destroyed; under no circumstances should non-employees (i.e., volunteers) retain possession of confidential information, nor should the material be forwarded to other employees or volunteers, nor should it be copied in any format. Upon completion of event or on the last day specified, access will be removed from Advancement's Microsoft SharePoint Alumni Information account. Requestors must provide the Office of Development with all data updates and forward unsubscribe requests, immediately upon receipt to alumni@whittier.edu.

Failure to abide by any of the policies stated within this document may result in denial of access to information contained in the alumni, parent, and donor database. Request for reinstatement of access to this information must be approved by the Vice President for Development or their designee and must include written assurance of future compliance with these policies.