Colorado Northwestern Community College

FOUNDATION

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INTRODUCTION

This manual has been compiled to assist in understanding the policies and practices which govern the operation of the Colorado Northwestern Community College Foundation (CNCCF, The Foundation).

The policy-making function of the Foundation Board is derived from statutory authority. Policies adopted by the Board are directives for operation of the Foundation. They are designed to give clear guidance to the Executive Director of Advancement/Foundation and staff (if applicable).

Through policy, the Executive Director has been given authority to prescribe operational procedures implementing Foundation policy and to manage and direct all operations of the Foundation. Operational procedures have the force of the Foundation policy and are reviewed by the Board as they stipulate or at the discretion of the Executive Director.

To differentiate between policies and procedures, the following designations have been made:

Policy:	Policy is approved by the Colorado Northwestern Community College Foundation Board. A policy can be changed only with approval from the Board.
Procedure:	Procedure is the method of accomplishing the work with steps and instructions for each aspect of the task.

Establishment

The Colorado Northwestern Community College Foundation was formed in 1979 to expand the college's resources through grants, corporate/individual gifts, and special fundraising events. The Foundation exists to ensure the financial sustainability of the college, a vital institution in Northwest Colorado. Through the combined efforts of our supporters, we can create a thriving environment where students can excel academically, personally, and professionally.

Mission

The Foundation's mission is to use ethical and effective fundraising practices to support CNCC in its commitment to provide accessible, affordable, quality education. Foundation support enables CNCC to:

- Enhance Current Instructional Programs
- Develop New Instructional Programs
- Improve College Facilities

- Offer Student Scholarships
- Fund Special Projects outside of the scope of traditional funding sources

College Support and Recognition of the Foundation

The College may provide office space and equipment, utilities, postage, janitorial services, and personnel costs. A formal contract between the College and the Foundation shall define the relationship.

The Executive Director may hold a position within the College. When this condition exists, the time allocation and reporting responsibility must be agreed upon by the College and the Foundation. A formal contact between the College and the Foundation relative to such an arrangement is required.

Philosophy

The philosophy of the Foundation is to be responsive to its mission statement by increasing public awareness of the College and student financial needs; by communicating the strong relationships between the College and the community and by working to finance educational areas that enhance the growth of Northwest Colorado.

Image

The image of the Foundation reflects an active, professional fund-raising board, committed to raising donations for scholarships, academic programs, and campus development, al for the betterment of the community.

IRS Code

The Foundation is a 501(c)3 organization. Contributions to the College through the Foundation are fully tax-deductible according to the schedules established under tax and estate tax regulations.

The Foundation will adhere to IRS regulations regarding establishing the tax-deductible portion of admission to Foundation events.

Board Members & Executive Director Expectations

Board Members are selected based on their willingness to share personal resources with the Foundation, alumni of Colorado Northwestern Community and/or their commitment to attend to Foundation matters.

The Foundation Board expect that the Executive Director will:

1. Serve as the Chief Operations Executive for the Foundation.
2. Serve as the professional advisor to the Board.
3. Recommend appropriate policies for consideration.
4. Effectively implement all policies adopted by the Board.
5. Inform the Board fully and accurately on all matters.
6. Interpret the needs of the Foundation and present professional recommendations on all problems and issues considered by the Board.
7. Develop an operating budget with the Treasure, and/or finance committee.
8. Assist the Board in developing and conducting community awareness programs.

The Executive Director expects the Board to counsel and advise, giving the benefit of its judgment, expertise, and familiarity with the Foundation.

1. Have a strong commitment to the mission and goals of the Foundation and the college.
2. Be informed, understand and support Foundation policies, programs, and services.
3. Be knowledgeable about CNCC and the Colorado Community College System.
4. Provide leadership and advocacy in developing public understanding of the Foundation and college mission; and help build a bridge between the college and the community.
5. Suggest possible additions to the board who are persons of achievement and who can make significant contributions to the work and progress of the Foundation.
6. Regularly participate in board meetings, assigned committees and functions. Must attend at least 80% of regularly scheduled board meetings, board retreats, virtual meetings and special meetings throughout the year. If unable to attend, absence must be communicated with the Executive Director and Board Chair. If attendance is under the 80%, the Board Chair and Executive Director will reach out to determine interest and commitment to the Board.
7. Actively serve on board committees as requested by the chair.
8. Review agenda and supporting material prior to meetings.
9. Suggest agenda items for meetings to ensure that significant matters are addressed.
10. Give advice, set policy, and demonstrate leadership in reviewing all fiscal matters, including budget and action plans.
11. Follow conflict of interest and confidentiality policies.
12. Assist the Foundation with the development and implementation of fund-raising strategies including networking and solicitation.
13. Help cultivate, identify, and assist with new prospects for resource development through individuals, businesses, and other sources of grants or gifts that may be secured.
14. Make a personally meaningful financial contribution to the Foundation in support of the goal of 100 percent board member participation annually.

Emeritus Membership

The Board may, in its discretion, grant the title of Board Member Emeritus to any former member of the Foundation Board. The honoree shall server at the pleasure of the Board. The title Board Member Emeritus shall be granted to current or former member of the Board who served with distinction, held an important leadership role, and made or continues to make significant contributions, engage in major volunteer or advocacy activities in his or her service on the board and completed the term(s) for which he or she was appointed. A proposal for Board Member Emeritus shall be made by nomination. The majority vote of the Board is required for approval. The nomination of a Board Member Emeritus status will usually occur at the end of his or her term but may occur at any time during his or her term. Board Member Emeriti shall be entitled to receive notice of meetings of the Board, and any other committee(s) on which they may be asked to serve as consultants or advisors; to attend and participate in these meetings, which includes voting; to receive copies of minutes, reports and other relevant material routinely delivered to members of the Board or of its committees on which they are asked to serve. A Board Member Emeritus shall not be subject to any attendance policy, counted in determining if a quorum is present at a meeting, entitled to hold office, or entitled to vote at any board meeting.

Code of Ethics

The CNCC Foundation, its Board of Directors, Executive Director, volunteers and staff accept and abide by the following professional practices:

- We shall conduct activities in accord with accepted professional standards of accuracy, truth, integrity, and good faith

- We shall practice responsible stewardship to assure that resources are vigorously and ethically sought, and that the intent of the donor is honestly fulfilled.
- We shall fully disclose, if requested, to potential donors all relationships which might pose, or appear to pose, possible conflicts of interest.
- We refuse to engage in dubious fund-raising tactics, conduct misleading campaigns or events, use high-pressure techniques, or pay for or make use of insincere endorsements.
- The names and addresses of our donors will neither be sold to, nor exchanged with, any other agency or commercial enterprise without the express consent of the donor.
- We affirm, through personal giving, a commitment to the CNCC Foundation in its goal to fulfill its mission.
- We intend to commit our time, skill and resources.

Conflict of Interest

For Directors and Officers and Members of a Committee with Board Delegated Powers
(This policy is based on the IRS model Conflict of Interest policy, which is an attachment to Form 1023. It adds information needed to allow the CNCC Foundation (CNCCF) to assess director independence to answer questions on Form 990.)

The purpose of this policy is to protect the Foundations interests when it is contemplating entering a transaction or arrangement that might benefit the private interests of an officer or Executive Director of Advancement/Foundation or might result in a possible excess benefit transaction.

This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations. It is also intended to identify "independent" directors.

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Foundation Board.

Any director may recuse himself or herself at any time from involvement in any decision or discussion in which the director believes he or she has or may have a conflict of interest, without going through the process for determining whether a conflict of interest exists. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Foundation Board meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Board members shall decide if a conflict of interest exists.

Procedures for Addressing the Conflict of Interest

- An interested person may make a presentation at the Board meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- The Board Chair shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
- After exercising due diligence, the Board shall determine whether the Foundation can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board shall determine by a majority vote

of the disinterested directors whether the transaction or arrangement is in the Foundation's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter the transaction or arrangement.

Violations of the Conflicts of Interest Policy

- If the Board has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Board or Executive Committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Annual Statements

Each Board member shall annually sign a statement which affirms such person:

- Has received a copy of the conflict-of-interest policy
- Has read and understands the policy
- Has agreed to comply with the policy
- Understands the Foundation is charitable and to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.
- Each voting member of the Board shall annually sign a statement which declares whether there is a conflict of interest or not.
- If at any time during the year, the information in the annual statement changes materially, the board member shall disclose such changes and revise the annual disclosure form.
- The Executive Committee shall regularly and consistently monitor and enforce compliance with this policy by reviewing annual statements and taking such other actions as are necessary for effective oversight.

To ensure the Foundation operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- Whether compensation arrangements and benefits are reasonable, based on competent survey information (if reasonably available), and the result of arm's length bargaining.
- Whether partnerships, joint ventures, and arrangements with management organizations, if any, conform to the Foundations written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement or impermissible private benefit or in an excess benefit transaction.

When conducting the periodic reviews, the Foundation may use outside advisors. If outside experts are used, their use shall not relieve the Board of its responsibility for ensuring periodic reviews are conducted.

Anti-discrimination

The Foundation abides by and implements the anti-discrimination policy established by the State Board for Community Colleges and Occupational Education policy, BP 19-60 Prohibition of Discrimination, Harassment or Retaliation

Whistleblower Protection

Foundation abides by and implements the whistleblower protection policy established by the State Board for Community Colleges and Occupational Education policy, BP 3-71 Whistleblower Protection.

ADMINISTRATIVE POLICIES

Endowment Fund Disbursement

The Foundation is responsible for distributing funds as directed by donors, and for managing funds so that accounts are preserved and increased to a level that retains their power.

Tax deductible receipts for gifts to the CNCC Foundation are issued by the Foundation Office.

To that end, the following guidelines are established by the Foundation Board of Directors, who:

- Shall have the authority to spend available funds based on the balance available for distribution based on terms of gift instrument or endowment policy.
- Board approval is required for appropriation of available endowment funds. If appropriated funds remain undistributed at year-end, they are to be returned to their respective endowment / fund.
- Shall work with the Financial Aid Office and Scholarship Committee to distribute scholarship awards according to guidelines set by individual donors.
- Shall have the authority to award four percent of the total principal, interest, and other earned income, of endowed scholarship funds each year based on December 31 account figures.
- May appropriate for expenditure or accumulate so much of an endowment fund as the institution determines is prudent for the uses, benefits, purposes and duration for which the endowment fund is established. Unless stated otherwise in the gift instrument, the assets in an endowment fund are donor-restricted assets until appropriated for expenditure by the institution. In deciding to appropriate or accumulate, the institution shall act in good faith, with the care that an ordinarily prudent person in a like position would exercise under similar circumstances, and shall consider, if relevant, the following factors:
    - The duration and preservation of the endowment fund
    - The purposes of the institution and the endowment fund
    - General economic conditions
    - The possible effect of inflation or deflation
    - The expected total return from income and the appreciation of investments
    - Other resources of the institution
    - The investment policy of the institution

Administrative Fees

Gift Fee

CNCC Foundation operations are funded through a combination of revenue from earnings on short-term funds, gift fees, and direct support from the College. Gift fees allow the CNCC Foundation to reduce its

reliance on direct funding for its operations from CNCC, freeing up College funds for educational purposes.

CNCC Foundation's gift fee is 3% on current and permanently restricted donations for athletics and individual academic programs.

CNCC Foundation's gift fee will not be administered to scholarship fund donations, unrestricted donations or gifts made by a private foundation that has a written policy stating that it will not pay gift fees.

Gift Acceptance

This policy is intended to guide the Staff and Board at the Foundation in discussing and evaluating current and deferred gifts with individual donors and their advisors. Ideally, a donor will communicate with the Foundation a gift is being planned, to formalize and document the donor's charitable intent. However, this may not always occur as some donors may not notify the Foundation in advance of an estate gift, choosing instead to preserve their anonymity. In situations where the Foundation finds itself in active donor conversations in advance of a gift, this policy can provide helpful guidance to donors and their advisors.

The Foundation reserves the right to decline a gift for any reason, including gifts that do not advance the core mission or do not appear to have charitable intent.

Variance from the Gift Acceptance Policy requires Board approval.

Matters of Practice

Donor Bill of Rights

The Foundation supports the Donor Bill of Rights, as adopted by the Association of Fundraising Professionals.

Model Standards of Practice

The Foundation supports the Model Standards of Practice for the Charitable Gift Planner, as adopted by the National Association of Charitable Gift Planners. A copy is attached.

Authorization

Authorization to solicit planned gift agreements is granted to the Executive Director of Organization, its Board of Directors, and designated members of staff. Acceptance of a gift by Organization may require approval by the Gift Review Committee as outlined in this Policy. To the extent possible, planned gifts will be negotiated in accordance with the Gift Acceptance Policy and will be consistent with the mission. In addition, it is also acknowledged that no policy can fully anticipate every potential gift scenario in advance. As such, this policy is intended to provide guidelines and guidance, with certain gifts requiring evaluation on a case-by- case basis.

Tax, Financial and Legal Advice

Representatives of the Foundation may provide education/information about various planned giving options and strategies, including questions a donor should contemplate when considering a gift. However, representatives of the Foundation are not permitted to offer tax, financial or legal advice. Donors will be encouraged to seek guidance from independent, professional advisors.

Legal and Outside Counsel

The Foundation may seek the advice of legal counsel, the organization's Auditor, investment manager(s),

and/or other advisors as deemed appropriate. In general, use of counsel may be helpful in the following ways:

- To evaluate potential gifts of real estate, tangible personal property, or other less common assets
- To evaluate potential gifts of closely held securities, partnership interests, or other less common business interests
- Determining correct accounting treatment and/or reporting requirements for IRS compliance
- Other instances in which outside expertise is deemed helpful to inform a gift acceptance decision

Payment of Fees

The Foundation will not pay legal fees on behalf of a donor (e.g. drafting of legal documents) unless authorized by the Board of Directors. In addition, the Foundation will not pay for a donor's qualified, independent appraisal (where required), or any commission or 'finder's fee' for any gift received.

Restrictions on Gifts

The Foundation will accept both unrestricted gifts and gifts designated for specific programs and purposes, provided that such designations are consistent with our mission, purposes, and priorities. The Foundation will not accept gifts that are deemed too restrictive in purpose or those that may prove too difficult to administer.

Gift Review Committee

A Gift Review Committee will be convened as necessary by the Chairperson of the Board of Directors to evaluate a potential gift to the Foundation. The committee will consist of:

- Board Chairperson
- Member(s) of the Board Finance Committee
- CNCC Vice President of Administration and/or CNCC Vice President of Instruction
- CNCC President, if deemed appropriate
- Executive Director, as a non-voting member

As needed, the Gift Review Committee is encouraged to consult with Legal Counsel or other experts during its review and will have responsibility for review and evaluations of complex gifts, real estate gifts, and gifts involving any responsibility to manage a donated asset prior to sale. Actions may include:

- Review of preliminary information to determine any need for additional information/documentation from the prospective donor regarding a proposed gift
- Review to assure compliance within the Gift Acceptance Policy.
- Review to confirm that a proposed gift is consistent with CNCC's goals and mission.
- Review of proposed language for special purpose gifts and/or designated funds to assure that they comply with Foundation requirements.
- Recommendations to the Board to accept or decline any gifts.

IRS Compliance

The Foundation will comply with all IRS guidelines in the administration of its Planned Giving Program. Compliance will include completing the appropriate sections of IRS Form 8283 and IRS Form 8282.

- A donor must file IRS Form 8283 to report applicable non-cash donations. For gifts valued in excess of $5,000, the Foundation must also complete Part IV of Form 8283 to acknowledge receipt of the gift.
- Donor will present Form 8283 to the Foundation to complete Part IV.
- Completing Part IV of Form 8283 does not substantiate a gift's value, only confirms receipt of the gift.

- By completing Part IV, the Foundation also acknowledges its responsibility to complete Form 8282, if applicable.
- The Foundation will file IRS Form 8282 upon the sale or disposition of any applicable asset sold within three years of receipt. IRS Form 8282 must be filed within 125 days of the asset's sale or disposition.
- Appraisals: A donor is required to secure a Qualified Independent Appraisal for all applicable gifts. As a matter of donor stewardship, the Foundation will identify this need and inform the donor that a Qualified Independent Appraisal must occur within 60 days prior to completing the gift.

Donated Assets

Monetary Gifts

- All monetary gifts shall be accepted by the Foundation regardless of amount, given that the source of funds is not a business or entity inconsistent with its mission. Any gifts in question will be reviewed by the Gift Review Committee prior to formal acceptance.
- Monetary gifts can be made via cash, check, payroll deduction, credit card or Electronic Funds Transfer (EFT). The Foundation will take all reasonable precautions to assure that credit card and bank account information remains confidential.
- Checks should be made payable to Colorado Northwestern Community College Foundation or CNCC Foundation. If a donor wishes to designate the gift to a specific use it must be consistent with the mission. In no event shall a check be made payable to an individual who represents the Foundation.
- Pledges be payable in single or multiple installments and must have a value of at least $5,000. Generally, a pledge may not exceed 5 years in duration. All donors must complete a pledge form or confirm the pledge in writing.

Non-Monetary Gifts

- Gifts of non-traditional assets will be subject to review by the Gift Review Committee. Issues of risk, holding costs, complexity and liquidity/marketability and usefulness to CNCC must be explored prior to acceptance.
- All responsibilities for any appraisal or valuation of non-cash items will be met by the donor and must be in accordance with IRS guidelines.
- The Foundation may accept in-kind donations of goods or products when usable and relevant to current needs.
- Patents, copyrights and royalties may be accepted after approval by the Gift Review Committee. For patents and copyrights, the donor must assign 100% of the interest to the Foundation.
- Installment notes will be considered on a case-by-case basis, after thorough review by the Gift Review Committee. While potentially advantageous to the Foundation, the donor will be advised to seek guidance from his/her professional advisors regarding the tax implications of these gifts.
- Oil, Gas and Mineral rights will be considered on a case-by-case basis, after thorough review by the Gift Review Committee. There is considerable variability in the value, productivity and

liquidity in holding and/or selling these rights. In general, rights with an anticipated market value below $25,000 will not be considered unless otherwise deemed advantageous to Organization. In no situation will the Foundation accept a working interest in any such property.

- Gifts of time share interests will be discouraged. However, if the Gift Review Committee determines a potential gift is highly marketable, the Foundation may choose to accept time share interests where the value to Organization exceeds $50,000. During review, the Foundation will confirm an active market for sale of the time share interest and request a copy of the donor's Qualified, Independent Appraisal.
- Real Estate Investment Trusts (REIT) may produce Unrelated Business Income to a non- profit organization, and some may also prohibit non-profit ownership. As such, any potential gifts of REIT interests will be carefully reviewed by the Gift Review Committee prior to acceptance.
- The Foundation will adhere to all IRS requirements related to disposing of non-monetary gifts and filing appropriate forms (e.g. Form 8282).

Gifts of Publicly Traded Securities

- Readily marketable securities, such as those traded on publicly listed exchanges, can be accepted.
- In general, gifts of publicly traded securities will be sold immediately by the Foundation. Exceptions to this policy may be granted with Board approval, if/as recommended by the Gift Review Committee.
- For gift crediting and accounting purposes, the value of the securities is the average of the high and low on the date of the gift, which is the date on which the security is formally transferred to the Foundation ownership.

Gifts of Closely/Privately Held Securities

- Non-publicly traded securities may be accepted on a case-by-case basis by the Gift Review Committee after a thorough due diligence review and understanding of all corporate/business documents. A representative of the Foundation will contact the donor and/or closely held corporation to:
  - Obtain copies of all appropriate documentation
  - Determine if any restrictions on sale or transfer exist,
  - Secure an estimate of fair market value (e.g. copy of qualified business appraisal)
  - Prior to acceptance (and due to potential liquidity issues), the Foundation will explore options or plans for the liquidation of closely held securities through redemption or sale.
- No commitment for the repurchase of closely held securities will be made prior to completion of the gift of the securities.
- No restrictions on the sale of closely held securities can be made by the donor as a condition for any gift.
- Certain forms of closely held securities (e.g. Section 144 Restricted Stock) may require a defined holding period prior to sale. The Gift Review Committee will explore and approve of any such conditions prior to gift acceptance.

- The Foundation will not accept gifts of *General Partnership* interests. Gifts of *Limited Partnership Interests* may be permissible, but the Foundation cannot be required to make future contributions to the partnership, nor can it become liable for partnership debts, negligence on the part of the partners, hazardous waste cleanup costs, and other substantial expenses. Gifts of *Family Limited Partnership Interests* are permissible when a donor has evidence or a history of charitable intent.
- The donor is responsible for obtaining a qualified, independent appraisal to determine the value of the gift for tax purposes.
- The Foundation will account for gifts of closely held securities/business interests in accordance with IRS policies and guidelines.

Gifts of Real Estate

- All potential gifts of real estate must be reviewed by the Gift Review Committee prior to acceptance.
- Special consideration will be given to any past or present environmental issues on the property, along with potential marketability/liquidity issues. In general, gifts of real estate will be sold as soon as practicable.
- The donor is responsible for obtaining a qualified independent appraisal of the property, as required by the IRS. The cost of the appraisal is borne by the donor. The Foundation reserves the right to obtain and pay for a second appraisal if it determines that it is prudent to do so.
- During consideration of the gift, a member of the Gift Review Committee must conduct a visual inspection of the property. If the property is located in a geographically isolated area, a local real estate broker can substitute for a committee member in conducting the visual inspection.
- The Foundation will require a Phase I Environmental Audit be conducted for all proposed gifts of nonresidential real estate, and residential real estate as deemed necessary. While this could be an expense of the donor, an environmental audit – unlike a qualified appraisal – benefits the Foundation in its decision to accept or reject the asset; thus, the Foundation may elect to pay for the Audit provided that other conditions of acceptance are in place.
- If the Phase I Environmental Audit suggests that environmental hazards may be present, the Foundation may explore a Phase II Audit to specify the damage. However, due to expense and resulting legal obligations, this will be done judiciously. In almost every situation, the suggestion of environmental contamination from a Phase I Audit will dissuade the Foundation from pursuing the gift.
- Due to the expenses associated with gifts of real estate, only gifts valued in excess of $100,000 will be accepted.
- During consideration of the gift, the donor must provide copies of the following documents:
    - Real estate deed, including full legal description of property
    - Preliminary title report
    - Most recent property tax bill
    - Insurance policies in force
    - Substantiation of zoning status, if/as necessary
    - Mortgages or other encumbrances

- Depending on the value and desirability of the real estate, the donor's connection with the Foundation, and the donor's past gift record, the donor may (or may not) be asked to pay for all or a portion of the following:
    - Maintenance costs (prior to sale)
    - Real estate taxes (prior to sale)
    - Insurance premiums (prior to sale)
    - Real estate broker's commission and other costs of sale
- Real estate subject to a mortgage can be accepted in certain situations, based on a thorough case-by-case review. Donors will be strongly encouraged to explore the tax implications in donated mortgaged real estate.
- For gift crediting and accounting purposes, the value of the gift is the appraised value of the real estate. (Note: For gift crediting purposes, the Foundation can elect to subtract costs incurred after the gift is made, including those for maintenance, insurance, real estate taxes, broker's commission, etc.)

Gifts of Life Insurance

- Gifts of life insurance can be made in the following ways:
    - Irrevocably assign ownership in a paid-up policy
    - Irrevocably assign ownership in a policy in which premiums are still due
    - Establish a new life insurance policy for which Colorado Northwestern Community College Foundation will be the owner and beneficiary
    - Name Colorado Northwestern Community College Foundation as a beneficiary of a policy in which a donor retains ownership
- The Foundation will accept outright gifts of life insurance policies only when named as the owner and beneficiary of 100% of the policy. The Foundation will retain all power in accordance with ownership, including the rights to surrender a policy and select payment options.
- The Foundation will not accept life insurance gifts that include any prearranged obligation to maintain the policy by paying premiums from agency assets. However, the Foundation may elect to continue premium payments if deemed prudent.
- If the policy is a paid-up policy, the value of the gift for accounting purposes is the policy's replacement cost. This value can be obtained from the life insurance company issuing the policy.
- If the policy is partially paid-up, the value of the gift for accounting purposes is the policy's cash surrender value. (Note: For IRS purposes, the donor's charitable income tax deduction is equal to the interpolated terminal reserve, which is an amount slightly in excess of the cash surrender value. A donor can request this value from the issuing life insurance company.)
- The Foundation will not enter any charitable split-dollar, charitable reverse split- dollar, or partial interest agreements.

Gifts of Tangible Personal Property

- Gifts of tangible personal property such as jewelry, artwork, collections, equipment, materials and software may be accepted after appropriate consideration by the Gift Review Committee.

- Gifts of tangible personal property should have a use related to the Foundation's charitable purpose and, as appropriate, be readily marketable to support that charitable purpose.
- No property that requires special display facilities or security measures will be accepted by the Foundation without formal approval. Other potential costs must be considered, including transportation, storage, maintenance/repair and insurance.
- Depending upon the anticipated value of the gift, the donor may be required to obtain a qualified independent appraisal prior to making the gift. The appraisal cost will be paid by the donor.
- The Foundation adheres to all IRS requirements related to acceptance and disposal of gifts of tangible personal property, including the filing of appropriate forms (Form 8283 and Form 8282).

Planned Gifts

The Foundation will utilize the following planned gift options, though some of these plans (*) may be administered by another entity (such as a Community Foundation) for the benefit of the Colorado Northwestern Community College Foundation:

- Bequests
- Beneficiary Designations
- Charitable Gift Annuities*
- Deferred Charitable Gift Annuities*
- Charitable Remainder Trusts*
- Charitable Lead Trusts*
- Retained Life Estates*
- Bargain Sales*

Bequests: Will, Living Trust

- Assets transferred through bequests that have immediate value to the Foundation or can be liquidated for the Foundation benefit will be encouraged. Gifts that appear to require more cost than benefit will be discouraged or rejected/disclaimed.
- In special situations, donors who have indicated they have made a bequest to the Foundation may be asked to disclose, in writing or by copy of the will or living trust provision, the relevant clause that benefits the Foundation as evidence of the gift. However, this request shall be made judiciously and is not a condition for any gift. Such information will be used for internal purposes and is not binding to the donor.
- The Foundation will not serve as a Personal Representative (Executor) for a donor's estate.

Beneficiary Designations: Life Insurance, 401(K), IRA, POD/TOD Arrangements

- Assets transferred through beneficiary designations that have immediate value to the Foundation or can be liquidated shall be encouraged.
- In some situations, donors who have indicated they have named the Foundation as a beneficiary may be asked to disclose, in writing or by copy of the designation form, the relevant clause that benefits the Foundation as evidence of their gift. However, this request shall be made judiciously and is not a condition for any gift. Such information will be used for internal purposes and is not binding to the donor.

Charitable Gift Annuities

- A charitable gift annuity is a legal contract between an organization and the donor. In exchange for a gift of cash, securities or other readily marketable property, the organization agrees to pay a lifetime annuity to one- or two-income beneficiaries. The annuity payment is a fixed sum based on the size of the gift and the age(s) of the income beneficiary(s).
- Gift annuities are governed by state law, as determined by the donor's residence. For Colorado residents, Organization will adhere to all legal requirements when issuing a charitable gift annuity.
- In general, no income beneficiary shall be younger than 60 years old at the time the annuity is to begin. Gift annuities allow for a maximum of two income beneficiaries.
- The minimum gift accepted to establish a charitable gift annuity is $10,000.
- The rates payable on charitable gift annuities shall be those established by the American Council on Gift Annuities, unless otherwise approved by the Board of Directors.
- Gift annuity funds will be managed by a partner entity to ensure all obligations to donors are met.

Deferred Charitable Gift Annuities

- A deferred gift annuity is a legal contract between an organization and the donor. In exchange for a gift of cash, securities or other readily marketable property, the organization agrees to pay a lifetime annuity to one- or two-income beneficiaries. The annuity payment is a fixed sum based on the size of the gift, the age(s) of the income beneficiary, and the future date the annuity payments begin.
- Deferred gift annuities are governed by state law, as determined by the donor's residence. For Colorado residents, Organization will adhere to all legal requirements when issuing a deferred charitable gift annuity.
- In general, no income beneficiary shall be younger than 55 years old. Commonly, the period of deferral between gift date and the date when payment begins will be the number of years until the donor turns 65 years old, although other time horizons are permitted. Deferred gift annuities allow for a maximum of two income beneficiaries.
- The minimum gift accepted to establish a deferred gift annuity is $10,000.
- The rates payable on deferred gift annuities shall be those established by the American Council on Gift Annuities, unless otherwise approved by the Board of Directors.
- Gift annuity funds and payments will be managed by a partner entity to ensure all obligations to donors are met.

Charitable Remainder Trusts

- A charitable remainder trust (CRT) is a separately administered trust created by a donor. The trust will make income payments to the donor and/or other named beneficiaries for life or a term of years (20-year maximum). Upon termination of the trust, all assets are distributed to the charitable remainder beneficiaries, as identified by the donor in the trust agreement.
- The Foundation will not serve as a trustee for a CRT, but it may elect to do so by utilizing a third-party administrator.

- A CRT may be established by a donor in consultation with the Foundation, or independently (and anonymously) by the donor with his or her advisors.
- Appropriate investment of CRT assets will be determined by the fiduciary hired to manage the trust. Outside of sample illustrations used to explain a CRT to a potential donor, no specific representations shall be made by a Foundation employee or person acting on its behalf regarding the management or investment of such CRT.
- The donor is responsible for securing independent counsel to provide legal guidance and preparation of trust documents. In special situations, The Foundation may elect to reimburse a donor for the legal costs to prepare a trust agreement. However, as a matter of practice, this will only occur when a donor simultaneously elects to waive his/her right to remove the Foundation as a charitable beneficiary.
- In some situations, the payout rate of a CRT may be negotiated by the donor and the Foundation. By law the payout rate cannot be lower than 5 percent, and the remainder interest must equal or exceed 10 percent.

Charitable Lead Trusts

- A charitable lead trust (CLT) is a separately administered trust created by a donor. The trust will make income or "lead" interest payments to the Foundation for a period measured by a fixed term of years, the lives of one or more individuals, or a combination of the two. After this time, the trust assets are paid to either the donor or to one or more named beneficiaries.
- The Foundation will not serve as a trustee for a CLT, but it may elect to do so through a third-party administrator.
- A CLT may be established by a donor in consultation with the Foundation, or independently (and anonymously) by the donor with his or her advisors.
- Appropriate investment of CLT assets will be determined by the fiduciary hired to manage the trust. Outside of sample illustrations used to explain a CLT to a potential donor, no representations shall be made by a Foundation employee or person acting on its behalf regarding the management or investment of such CLT.
- The donor is responsible for securing independent counsel to provide legal guidance and preparation of trust documents. In special situations, the Foundation may elect to reimburse a donor for the legal costs to prepare a trust agreement. However, as a matter of practice, this will only occur when a donor simultaneously elects to waive his/her right to remove the Foundation as a charitable beneficiary.
- In some situations, the payout rate of a CLT may be negotiated by the donor and the Foundation. The income level to the Foundation can be determined based upon the donor's wishes to support its mission, the amount of assets a donor wishes to transfer to heirs (or in the case of a grantor trust, back to the donor), and any potential transfer taxes.

Retained Life Estates

- A Retained Life Estate allows a person to donate a personal residence, farm, or other real estate to the Foundation, while retaining the right for the donor and/or another person to live on that property for either a term of years or the balance of the donor's and/or other person's lifetime(s).

- The Foundation will accept retained life estates in which it will have a remainder interest, and which are deemed to further its charitable mission. The Gift Acceptance Policy related to 'Gifts of Real Estate' should be reviewed prior to the acceptance of a Retained Life Estate.
- The donor should identify professional counsel to provide legal guidance and to draft and administer the life estate agreement. The donor is also responsible for obtaining a qualified, independent appraisal.
- During the retained use period, the donor will be responsible for all expenses related to property maintenance, real estate tax, insurance and utilities, unless otherwise negotiated by the donor and the Gift Review Committee.
- If state law requires participation by the remainderman (i.e. the Foundation) in any capital improvements on property subject to a life estate agreement, no such expenditures will be made without Board approval.

Bargain Sales

- A Bargain Sale allows the Foundation to acquire an asset at an amount lower than fair market value. The difference between the market value and the purchase price represents the donor's gift to the Foundation.
- All Bargain Sales will require approval by the Gift Review Committee. Assets common to Bargain Sales include securities, real estate, and tangible property with a related use that is readily salable or deemed useful in fulfilling the Foundation's mission.
- Prior to acceptance, the Foundation shall explore methods or plans of liquidation for the assets through redemption or sale, as applicable. In these situations, special consideration will be given to the asset's marketability.
- In general, assets subject to a mortgage will not be encouraged due to potential complexity and adverse tax implications for the donor.
- In general, Bargain Sale gifts will be sold immediately by the Foundation.

This policy shall be reviewed annually. In any instances where these procedures might conflict with State Board Policies and Procedures or State Statute, the State Board Policies and Procedures and State Statutes take precedence and are the rule.

Acceptance and Acknowledgement of Gifts

The Foundation serves as the central receiving, acknowledging, recording, and reporting unit for all gifts to the College. Donors should make checks payable to the Colorado Northwestern Community College Foundation. The Director of the Foundation ensures that all designated cash gifts are credited to the proper account and disbursed for the purposes designated by the donor. Complete records of all gifts are maintained by the Foundation. If a donor wishes to remain anonymous throughout the giving process, the donor should discuss appropriate arrangements with the Foundation.

GENERAL POLICIES

It is the policy of the Board to define and review periodically the roles and responsibilities of the Board and the Executive Director

Employee Expense Reimbursements

Office, Event and Hosting Expenses

Relevant expenses for business related events, supplies, and hosting will ideally be charged to a Foundation credit card. If staff use personal funds to make a purchase, an itemized receipt is required for reimbursement.

Lost receipts will be replaced by a statement explaining the purpose and reason and signed by the Executive Director. In the case of the Executive Director, the statement will also be signed by the Board Chair.

Record Retention and Destruction

The Foundations record retention and destruction policy is with respect to documents and other records, both in hard copy and electronic media. The purposes of the policy include:

1. Retention and maintenance of documents necessary for the proper functioning of the organization as well as to comply with applicable legal requirements.
2. Destruction of documents which no longer need to be retained.
3. Guidance for the Board of Directors, officers, staff, and other constituencies with respect to their responsibilities concerning document retention and destruction.

The Executive Director of Advancement and Foundation is responsible for:

1. Supervising and coordinating the retention and destruction of documents pursuant to the Document Retention Schedule included below.
2. Documenting the actions taken to maintain and/or destroy organization documents and retaining such documentation.
3. Modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised document categories as may be appropriate to reflect organizational policies and procedures.
4. Authorized to periodically review the policy and its compliance with legal counsel and to report to the Board of Directors as to compliance.
5. Appoint one or more assistants to assist in carrying out the responsibilities, however, retaining ultimate responsibility.

The board members, staff, volunteers, and outsiders with respect to maintaining and documenting the storage and destruction of the organization's documents. The Executive Director will report to the Board of Directors, which maintains the ultimate director of management. The college staff shall be familiar with the policy, shall assist in implementation. The responsibility of volunteers with respect to this policy shall be to produce specifically identified documents upon request of management, if the volunteer still retains such documents. In that regard, after each project in which a volunteer has been involved or each term which the volunteer has served, it shall be the responsibility of the Executive Director to confirm whatever types of documents the volunteer retained and to request any documents necessary for retention. Outsiders may include vendors or other service providers. Depending on the sensitivity of the documents involved with outsider relationship, the organization, shall share the policy with the outsider, requesting compliance. In some instances, the Executive Director may require that the contract with the outsider specify the responsibilities in respect to this policy.

The organization becomes subject to a duty to preserve (or halt the destruction of) documents once litigation, an audit, or a governmental investigation is reasonably anticipated. Further, federal law

imposes criminal liability (with fines and/or imprisonment for not more than 20 years) upon whomever "knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United Stat, or in relation to or contemplation of any such matter or case." Therefore, if the Executive Director becomes aware that litigation, a governmental audit or a governmental investigation has been instituted, or is reasonably anticipated or contemplated, the Executive Director shall immediately order a halt to all document destruction under this policy, communicating the order to all affected constituencies in writing. The Executive Director may thereafter amend or rescind the order only after conferring with legal counsel. If any board member or staff member becomes aware that litigation, a governmental audit or a governmental investigation has been instituted, or is reasonably anticipated or contemplated, with respect to the organization, and they are not sure whether the Executive Director is aware of it, they shall make the Executive Director aware of it. Failure to comply with this policy, including, particularly, disobeying the destruction halt order, could result in possible civil or criminal sanctions. In addition, for staff, it could lead to disciplinary action including possible termination.

Documents in electronic format shall be maintained just as hard copy are, in accordance with the Document Destruction Schedule. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the Executive Director shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the organization.

It shall be the responsibility of the Executive Director, after consultation with counsel, to determine how privacy laws will apply to the organization's documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the organization in the case of emergency shall be regularly duplicated or backed up and maintained in an off-site location. The Executive Director shall develop reasonable procedures for document retention in case of an emergency.

Document Retention Schedule

Periods are suggested by are not necessarily a substitute for counsel's own research and determination as to appropriate periods.

Document Type	Retention Period
CORPORATE RECORDS	
Annual reports to the Secretary of State	Permanent
Articles of incorporation	Permanent
Board meeting and board committee minutes	Permanent
Board policies and resolutions	Permanent
Bylaws	Permanent
Construction documents	Permanent

Fixed asset records	Permanent
IRS application for tax exempt status (Form 1023)	Permanent
IRS determination letter	Permanent
State sales tax exemption letter	Permanent
Contracts	7 years after termination
General correspondences	3 years
ACCOUNTING AND CORPORATE TAX RECORDS	
Annual audits and year-end financial statements	Permanent
Depreciation schedules	Permanent
IRS Form 990 tax returns	Permanent
General ledgers	7 years
Business expense records	7 years
IRS form 1099	7 years
Journal entries	7 years
Invoices	7 years
Sales records (books)	5 years
Petty cash vouchers	3 years
Cash receipts	3 years
Credit card receipts	3 years
BANK RECORDS	
Check registers	7 years
Bank deposit slips	7 years
Bank statement and reconciliation	7 years
Electronic fund transfer documents	7 years
PAYROLL AND EMPLOYMENT TAX/HR RECORDS	
Not applicable currently – all Foundation staff are employees of the college, not the Foundation	
DONOR and GRANT RECORDS	
Donor records and acknowledgement letters	7 years
Grant applications and contracts	7 years after expiration
LEGAL, INSURANCE AND SAFETY RECORDS	
Appraisals	Permanent
Insurance policies (expired)	Permanent

Stock and bond records	Permanent
Trademark registrations and copyrights	Permanent
General contracts	3 years after expiration

Internal Controls

The policy establishes guidelines for managing checks to ensure proper authorization, accuracy, and security of financial transactions within the Foundation.

Segregation of Duties

The Executive Director of Advancement/Foundation will prepare all checks that are issued out of the Foundation. An authorized signer will be responsible for signing checks.

Authorized Signatures

At least one signer must sign every check issued out of the Foundation. The signature may be from any of the following individuals: the Foundation Board Chairman, the Foundation Board Treasurer and any other Board Member authorized as a signer on the bank accounts.

Reconciliation

The Executive Director of Advancement/Foundation will reconcile all bank accounts each month. All bank statements will be provided to the board during the appropriate board meeting.

Physical Security

The Foundation will maintain physical security of its assets to ensure that only people who are authorized have physical or indirect access to money, securities, real estate, donor records and other valuable property.

- Blank checks are stored in a locked drawer
- Passwords are used to prevent access to accounting software, donor database software and other systems.

PCI Security Policy

This policy outlines the security measures and procedures implemented by the Foundation to ensure compliance with the Payment Card Industry Data Security Standard (PCI DSS) and to protect cardholder data.

This policy applies to all employees, volunteers, contractors, and third-party vendors involved in the processing, storage, or transmission of cardholder data within the Foundation.

Cardholder Data Protection

- Store only the minimum necessary cardholder data required for nonprofit operations. Avoid storing sensitive authentication data (e.g., full magnetic stripe, CVV2) after authorization.
- Encrypt cardholder data during transmission over open, public networks using strong cryptography.
- Restrict access to cardholder data to individuals whose responsibilities require it. Implement role-based access controls and review user access rights regularly.

Network Security

- Install and maintain a firewall to protect cardholder data. Prevent direct public access between the internet and any system component in the cardholder data environment (CDE).

- Implement and maintain a secure network architecture, including proper configuration of network devices such as routers and switches.

Vulnerability Management

- Deploy anti-virus software on all systems commonly affected by malware, ensuring it is regularly updated.
- Regularly apply security patches and updates to all systems and software in the CDE. Follow a documented process for identifying and addressing vulnerabilities.

Access Control Measures

- Implement strong access control measures, including multi-factor authentication (MFA) for accessing the CDE.
- Assign a unique ID to each person with computer access to cardholder data. Ensure that passwords are strong, changed regularly, and never shared.
- Restrict physical access to cardholder data. Implement appropriate security measures such as access badges, surveillance cameras, and visitor logs.

Information Security Policy

- Establish and maintain a security awareness program to educate employees and volunteers about PCI DSS requirements and their responsibilities for protecting cardholder data.
- Develop and maintain an incident response plan to address security incidents involving cardholder data. Ensure that employees and volunteers are trained to recognize and respond to security incidents.

Compliance and Governance

- Review this PCI Security Policy annually and update it as necessary to reflect changes in operations, technology, and PCI DSS requirements.
- Conduct regular internal audits to ensure compliance with PCI DSS requirements. Document and address any findings or non-compliance issues.

ACCOUNTING POLICIES

Operating Budget

During the month of March, the Executive Director and the Foundation Treasurer develop the operating budget, which is then submitted to the Foundation Board for final approval during the Foundation Board Retreat, which usually takes place in April.

Bookkeeping

The bookkeeping for the Foundation is performed in the Executive Director of Advancement and Foundation in accordance with standard accounting practices. The Executive Director reports the status of Foundation finances to the Board at each board meeting.

Banking

- Establishing or changing a bank account requires approval from the Foundation Board.
- The Executive Director may set up automatic, EFT payments with approval from the Foundation Board.
- Checks will be stamped with “FOR DEPOSIT ONLY, BANK INFORMATION, ACCT NUMBER” and are physically deposited at the bank location by the Executive Director.

- The Executive Director shall establish and maintain electronic account access for viewing purposes and document downloads (i.e. statements)

Bank Reconciliations

All Foundation bank statements will be reconciled as soon after the close of the month by the Executive Director of Advancement/Foundation. Reconciliation is a means of detecting and correcting accounting errors.

Credit Card

The Foundation credit card can be used to purchase office and event supplies, and for event/meeting refreshments, and donor stewardship. The credit card may also be used to pay for memberships, subscriptions, and trainings/conferences. Charges over $500 must be pre-approved by the Board Chair.

Annual Audit

A Certified Public Accountant will audit and issue an opinion on the financial records of the Foundation on an annual basis. The audit is made in accordance with generally accepted auditing standards, and accordingly, includes such tests of the accounting records and such other auditing procedures as necessary.

Financial Reports

The Executive Director is responsible for producing the following year-to-date prior to each board meeting: Statement of Financial Position, Statement of Activities, Balance Sheet, and the following monthly reports prior to each board meeting: Check Register, and Deposit Detail.

The Executive Director and Board review financial reports at each meeting and approve those reports.

Dormant Accounts

The purpose of this policy is to outline the procedures for managing dormant accounts within the Foundation to ensure proper stewardship of funds and compliance with relevant regulations.

An account is considered dormant if there has been no activity (donations, disbursements, or donor engagement) for a period of 24 months.

The Executive Director will execute the following notification process:

- Initial Notification: After 12 months of inactivity, the account holder (or primary contact) will receive a written notice informing them of the inactivity and requesting instructions for future use of the funds.
- Second Notification: If there is no response or activity within 3 months of the initial notification, a second notice will be sent as a reminder.
- Final Notification: If the account remains inactive for 18 months, a final notice will be issued, outlining the steps that will be taken if no response is received within 30 days.

If no response or activity occurs within 30 days of the final notification the following actions will be occur:

- Reallocation of Funds: The remaining balance in the dormant account may be reallocated to the foundation's general fund or a similar purpose-aligned fund, as determined by the foundation's board of directors.

- Account Closure: The dormant account will be closed following the reallocation of funds.

Account holders or their representatives may request reactivation of a dormant account at any time by contacting the foundation. Reactivation requests must include a plan for future use of the funds. Account holders will work with the Executive Director to reactivate the dormant account.

In certain cases, exceptions to this policy may be granted by the Foundation Board based on specific circumstances or donor intent.

SCHOLARHSIP POLICY

The Financial Aid Office administers the Foundation's scholarship program based on Foundation Board's review. Scholarship recipients are selected based on donor specifications. The Business Office disburses the scholarship funds on a per-semester basis after the Financial Aid Office has verified scholarship qualifications have been met. The Foundation reimburses the college each semester after receiving an invoice from the Financial Aid Office for the scholarships paid out at the beginning of the semester. The Foundation office will write a check and deliver to

DONOR RECOGNITION POLICY

The Foundation may establish donor recognition levels (i.e. President's Society).

The giving levels provide names of supporters whom the College can call upon for:

- Advocacy
- Support for College programs and services
- Awareness through dissemination of information
- Public acknowledgment of their support by listing names and levels in appropriate publication.

The Federal Income Tax Code, Section 170, allows an income tax deduction of the amount of the donor's gift as "a voluntary transfer without consideration." In other words, only the gift from which nothing is received in return is fully deductible. Where the donor receives services, goods, or

CAMPAIGN AND SPECIAL APPEALS POLICIES

Scholarship Campaign

The scholarship campaign is an annual appeal for funds to help with student's educational expenses and for other needs that cannot be funded through traditional sources.

The Foundation Board set a goal and the Executive Director designs and implements the campaign with the assistance of the Board.

Special Events

The purpose of special events is to develop and nurture friends, as well as raise funds.

With the assistance of the Foundation Board, the Executive Director plans and implements appropriate events.

Capital Campaigns

When a special project is brought to the attention of the Board, they may choose to run a capital campaign. In such case, a subcommittee would plan and implement the campaign.

FUNDRAISING POLICY

At CNCC fundraising is a community endeavor essential to the achievement of strategic goals. Staff, faculty, and students are encouraged to participate in supporting CNCC. To maximize success, assure adherence to the College's professional priorities and policies, and ensure ethical and respectful donor stewardship, the Office of Advancement serves as the coordinating agent for all College fundraising. Gift solicitation, proposals for gift solicitation, or fundraising events to be conducted by anyone (including faculty, staff, students, alumni, friends, etc.) for the benefit of CNCC and its students, programs, or facilities requires prior approval from the Executive Director of Advancement.

Requests to Conduct Fundraising Activity

The primary responsibility for leading CNCC in its fundraising efforts belongs to the Executive Director of Advancement, the Foundation Board, and CNCC Cabinet. Any faculty, department, program, student organization, or any employee or student of CNCC shall secure the approval of the Executive Director of Advancement/Foundation prior to engaging in any form of solicitation in the name of CNCC or otherwise. Fundraising activities must be submitted and approved via the ***Fundraising Request Form*** prior to solicitation of individuals, corporations, foundations, government agencies, or other constituent groups to ensure the effective coordination of the College's efforts in fundraising.

Definitions of Fundraising Activities

The Advancement Office includes the following in its scope of fundraising initiatives under its supervision, as defined by the Association of Fundraising Professionals:

1. Proposal: a written request or application for a gift, grant, or service.
2. Direct-mail fundraising: the solicitation of funds by mass mail, whether e-mail or paper.
3. Target market solicitation: a group of potential donors or other constituents that have certain characteristics in common, toward which a concerted effort is to be directed (including, but not limited to, parents, alumni, business owners in town).

Examples of activities to be coordinated through the Advancement Office include, but are not limited to, the following:

1. Any program or event designed to solicit or acknowledge/recognize financial support and donors, including dinners, special events, phonathons, golf events, etc.
2. Requests to private or public sources, such as foundations or government agencies, for the funding or new or existing instructional programs or in support of individual faculty members, scholarships, teams, students, staff or projects.
3. All other programs or activities to solicit gifts.

College and Non-College Fundraising Initiatives

The College is aware that students and employees often engage in fundraising activities for which the College is not the intended beneficiary. These activities may range from campus-based efforts to raise

funds for groups such as the United Way or local charities or employee/student participation in their local clubs or churches.

As stated above, when the activities are intended to benefit CNCC, they must be approved in advance by the EDA by submitting the FRF. When an activity is not intended to benefit CNCC, administrative approval is still required from the Office of the President.

Prohibited Activities

When a fundraising activity is not one that benefits the College directly or is not sanctioned by the College, members of the College community are prohibited from:

- Using email blasts on the campus internet system to solicit gifts
- Using one's status as a CNCC employee or student to secure a gift commitment
- Using CNCC employee or alumni directory information to create mailing/emailing or calling lists

Athletic/Club/Program Specific Fundraising

CNCC athletics, clubs, and program specific budgets operate under the authority of the College. Expenditures are reported through regular institutional channels and are reviewed to ensure compliance with college policies. Fundraising efforts may be utilized to meet and, in select cases, enhance current budgets through the channels outlined in this policy.

- Fundraising should help individual programs, clubs, teams and/or the Athletic Department contribute to the CNCC mission, vision and learning objectives.
- Fundraising goals are generated by the Program Director, Club Sponsor or Athletic Director to address any gap between college-budgeted funds and unbudgeted financial priorities deemed necessary. Overarching fundraising goals must be approved by the Senior Vice President of Academic Affairs and Executive Director of Advancement/Foundation.
- Fundraising goals must be categorized as current operations (such as equipment) or capital facility improvement with the understanding that:
    - *Current operations* - individual donations will be directed to the designated program, club, team and/or specific goal(s) the donor intends to support.
    - *Capital Facility Improvement* - capital facility improvement projects over $100,000 require CNCC Cabinet and Foundation Board approval. Once this is secured, funds may be raised in any amount for approved capital improvement projects. 100% of each gift will be applied to that specific capital project. No capital project will be undertaken until 100% of the costs of the project have been committed.
    - *Donations* - cannot be made directly to an employee of the college, or a student. Any gift solicitations will simultaneously include a request to continue giving or make a new gift.

Donor-based fundraising will take the form of:

- Direct solicitation by a gift officer or assigned to a trained volunteer.
- Pop-up campaigns leveraging email outreach and social media
- Annual fundraising event(s) for general support of Athletic Department (golf outing, Athletic banquet or other)
- Team-specific events such as golf tournaments
- Athletic boosters

- E-teams fundraising campaigns

AFFILIATIONS

Colorado Community College System (CCCS)

The CNCC Foundation Executive Director will be an active member of the CCCS Foundation group, and other organization or associations that support educational philanthropic activities as identified by the Board or college President.