

Responsible University Official: Vice President for Financial Operations and Treasurer Responsible Office: Office of Financial Operations Origination Date: March 5, 2012

FUNDRAISING FOR OTHER CHARITABLE ORGANIZATIONS

Policy Statement

Northwestern University is a corporation formed by state charter to fulfill certain educational, research and public service missions, and as such, it generally does not contribute financially to other registered not-for-profit charitable organizations. This policy provides guidance for circumstances in which the University is asked to undertake or assist in fundraising efforts on behalf of another organization. This policy is not related to the activities administered by Alumni Relations and Development.

Stewardship of assets and the prudent expenditure of University funds require guidelines with respect to the appropriate use of such funds. The University does not fundraise on behalf of forprofit businesses and organizations, or to foreign organizations. Only under rare circumstances, in accordance with this Policy, does the University fundraise on behalf of another registered not-forprofit charitable organizations.

Reason for Policy/Purpose

The purpose of this policy is to provide guidance for fundraising benefiting registered not-forprofit charitable organizations and to ensure that any approved fundraising is in accordance with the mission of the University. The policy applies to all University funds.

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Who Approved This Policy

Provost Executive Vice President

Who Needs to Know This Policy

All faculty and staff at Northwestern University

Website Address for this Policy

http://www.northwestern.edu/financial-operations/policies-procedures/policies/fundraising.pdf

Contacts

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Definitions

Charitable OrganizationAn entity recognized as exempt from federal
income taxation under section 115 (e.g.,
governmental entities) or section 501(c)(3)
of the Internal Revenue Code, as amended.DonationsDonations (including gifts, grants and
contributions) of money or property given to
a Charitable Organization without any
expectation of or receipt of direct economic

benefit or any other tangible compensation.

Policy/Procedures

Northwestern University may undertake or assist in fundraising efforts to Charitable Organizations only as outlined below. For Charitable Donations, see the Charitable Donations by the University Policy.

Please consult the Office of Student Affairs and the <u>Student Organization Finance Office</u> regarding student activities regarding charitable donations and fundraising.

Fundraising

Central and school development offices should be consulted for all fundraising activities for the benefit of the University.

Under certain circumstances, fundraising for a Charitable Organization is permissible. Individuals contemplating fundraisers to benefit an entity other than the University must complete a request form (see the Forms/Instructions section) and obtain approval from the central or school management where they work. The request form should be directed to the Office of Financial Operations for approval.

If a fundraiser for a Charitable Organization has not been authorized and approved as noted above, only personal donations (such as personal funds) may be given directly to the Charitable Organization.

If approved, the funds raised should not be solicited or processed as gifts to the University; and therefore, a University gift receipt should not be issued. The preferred method is to direct the donations to be made directly to the approved organization.

In rare circumstances where the University may elect to accept monetary donations, the following supporting documentation should be submitted.

- The Charitable Organization must submit a statement of support on the Organization's letterhead acknowledging that the fundraising will occur on its behalf and indicating the expected date of the receipt of the donation.
- The Organization must provide proof to the University that it is a Charitable Organization by providing a certification that it is a charitable organization recognized as exempt under Internal Revenue Code section 501(c)(3), by providing a copy of its tax-exempt determination letter issued by the Internal Revenue Service and providing a certificate of good standing from the secretary of state of incorporation (or comparable documentation for organizations exempt from tax under Internal Revenue Code section 115).
- A ChartField Request form must be submitted to Accounting Services to establish the Agency ChartField for the project.

Prohibited Activities

Members of the University community are prohibited from using University resources to fundraise on behalf of *for-profit businesses or organizations, or foreign organizations.*

If a fundraiser for a Charitable Organization has not been authorized and approved, personal donations (such as personal funds) should not be processed through University accounts, but may be given directly to the Charitable Organization.

The following are examples of activities that are not permissible without prior approval from the Office of Financial Operations.

- A Charitable Organization soliciting donations at University events and/or on University property.
- A University sponsored event in which a portion of the proceeds will go to a Charitable Organization.
- The solicitation of donations for disaster relief efforts.

Political Activities are not permitted.

As a Charitable Organization, the University may not participate or intervene in any political campaign on behalf of or in opposition to any candidate for public office. The penalties for violation of this law could include revoking the University's exempt status, as well as the Internal Revenue Service imposing excise taxes on the organization and its managers as a result of political expenditures. Therefore, the University does not provide donations or conduct fundraisers in support of political campaigns or candidates. Additional guidance can be found in the Lobbying and Communications By Faculty and Staff With Federal, State, And Local Government Officials Policy.

Raffles are not permitted.

Raffles are prohibited without prior approval from the Office of Financial Operations. Generally, a raffle means an agreement to pay something of value (valuable consideration includes but is not limited to money) in exchange for a game of chance whereby the winning chance is determined through a drawing or some other method based on the element of chance. Raffles are considered charitable gaming which is subject to strict rules, regulations and registration requirements.

Fundraisers for departmental social activities are not permitted.

Central and school development offices should be consulted for all fundraising activities for the benefit of the University.

Individuals contemplating fundraising activities that need further evaluation should contact the University Controller.

Nothing in this policy is intended to limit the ability of any faculty, staff or student to contribute personally to any charitable purpose.

Forms/Instructions

Request Form/Instructions

Appendices

NA

Related Information

NA

History/Revision Dates

Origination Date: March 5, 2012

Last Amended Date: March 29, 2016

Next Review Date: March 31, 2017