

Guidance re: Fundraising, Gifts, and Grants

All Northwestern University faculty, staff, units, and departments are required to comply with applicable anti-discrimination laws.¹ This memorandum has been prepared as a reminder to the Northwestern University community about the requirements under federal anti-discrimination laws and to assist members of the Northwestern community who are involved in seeking external funding for University programs, activities, initiatives, or benefits, including research. University stakeholders with questions about fundraising should contact ad-fags@northwestern.edu for guidance.

As recent federal guidance explained, federal law “prohibits covered entities from using race [, color, and national origin] in decisions pertaining to admissions, hiring, promotion, compensation, financial aid, scholarships, prizes, administrative support, discipline, housing, graduation ceremonies, and all other aspects of student, academic, and campus life.” This same principle applies to all protected characteristics, including but not limited to ethnicity, shared ancestry, and sex/gender.

For the purposes of fundraising for Northwestern, this means that gifts and grants to the University cannot be designated for a purpose that requires or causes the University to treat applicants, students, employees, interns, trainees, visitors, volunteers, or other individuals or groups differently based on a protected characteristic.² Additionally, gifts and grants cannot be awarded on the basis of information that is then used as a proxy for a protected characteristic. It is important that both the gift or grant agreement itself and the administration of the gift or grant is done in a manner that complies with applicable anti-discrimination laws.

Faculty seeking alternate sources of funding for research that may be impacted by recent changes in federal agency funding priorities should work closely with their local research administration and/or development team, Alumni Relations and Development, Office of Foundation Relations, and/or Corporate Engagement, as applicable.

Q1: May gifts and grants, or the University programs, activities, initiatives, or benefits they fund, target or preference individuals or groups in the Northwestern community for support or other disparate treatment based on their race, gender, or other protected characteristics?

A1: No. Gifts and grants to the University, as well as the University programs, activities, initiatives, or benefits they fund, should not target or preference individuals (or groups) within the Northwestern community for support or other disparate treatment based on protected characteristics. All University financial aid, programs, and activities—including but not limited to scholarships, grants, or other forms of financial aid for students, endowed gifts that fund faculty or postdoctoral positions, funding for training or broadening participation of students, postdoctoral fellows, or faculty (e.g. “pipeline programs”), and gifts for programs across the University—should be awarded without regard to protected characteristics to qualified students, faculty, staff, prospective trainees, etc. within the University community.

¹ Please refer to Northwestern University’s [Non-Discrimination Statement](#) and [Policy on Discrimination, Harassment, and Sexual Misconduct](#) for more information and resources.

² Protected characteristics under Northwestern’s [Policy on Discrimination, Harassment, and Sexual Misconduct](#) are race, color, religion, creed, national origin, ethnicity, caste, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, marital status, age, disability, citizenship status, veteran status, genetic information, reproductive health decision making, height, weight, or any other classification protected by law.

When partnering with a third party/external organization to expand fundraising efforts or increase the impact of University programs funded by gifts or grants, University employees should take steps to confirm that the external organization's efforts and programs likewise do not limit benefits or provide a preference for individuals or groups on the basis of protected characteristics. Additionally, gifts and grants to the University that fund University programs and activities involving individuals or groups outside of the Northwestern community could raise similar issues under federal anti-discrimination laws. Please send a message to ad-faq@northwestern.edu for assistance when seeking external funding for these sorts of programs or activities.

Q2: What characteristics can gifts and grants, or the University programs they fund, use to target or preference individuals or groups in the Northwestern community, such as through prizes or other University programs and activities?

A2: Clearly defined, identity neutral characteristics and criteria may be used (e.g., financial need, interest in specific areas of research or study, socioeconomic status, U.S. geography, first-generation status, etc.), but these criteria may not be proxies for race or other protected characteristics and must have identity neutral justifications. For instance, an individual's experiences, skills, interests and character attributes may be used to define eligibility for a gift-funded postbaccalaureate training opportunity, so long as that consideration is independent from the individual's identity itself. This also means that any information or materials that individuals are required to submit to establish eligibility under these sorts of programs must not be used as an indirect way of considering racial identity or other protected characteristics.

Q3: May the University accept, or may members of the University community solicit on its behalf, gifts or grants intended to support research aimed at studying individuals or groups based, at least in part, on their race, sex, sexual orientation or other protected characteristics?

A3: Yes. Gifts or grants may support research that recruits or studies individuals based on protected characteristics when doing so

- 1) is intrinsic to the research question (e.g., research on human physiology; maternal health; or diseases, conditions, or disparities that disproportionately affect certain populations; ethnography),
- 2) does not target or preference individuals or groups either inside or outside of the Northwestern community for support or other disparate treatment (benefits or burdens) based on protected characteristics (e.g., programs that focus on broadening participation of students, school-aged youths, researchers, faculty, other professionals in certain scientific or professional disciplines on the basis of protected characteristics; often referred to as "pipeline programs"), and
- 3) is aimed at filling an important gap in knowledge.

For example, gifts and grants may support research studies regarding health outcomes in underrepresented populations. Similarly, gifts and grants to support research on technology to assist individuals with disabilities are permitted, even when the subject recruitment of the research would be limited to those with disabilities.

Q4: Who should we be partnering with in connection with fundraising efforts?

A4: Both Alumni Relations and Development (ARD) and the Office for Research are familiar with recent federal guidance and can provide additional support to ensure gift or grant proposals for University programs, activities, initiatives, or benefits, including research, align with applicable laws. You should engage with these partners early on in any fundraising efforts to ensure the funding sources and initiatives being funded are compliant with applicable laws and appropriate for the University's 501(c)(3) tax exempt status.

Alumni Relations and Development has a large team who fundraises for financial aid, endowed professorships and other programs across the University. Fundraising for research activities can take different forms. Office for Research and Alumni Relations and Development work collaboratively on proposals to support various programs and research initiatives. Within ARD, Corporate Engagement and Foundation Relations are most involved in research initiatives. Gifts, whether from a foundation, corporation or individual, are ultimately processed by ARD while Sponsored Research processes grants that do not qualify as “gifts.” The decision as to whether a source of funds should be treated as a “gift” or a “grant” is dependent upon many nuanced factors and Sponsored Research and ARD regularly collaborate to determine the proper treatment for gifts and grants.

Last updated: June 1, 2025