# Gift Acceptance Policies & Procedures Corporation of the Catholic Archdiocese of Seattle

# **April 5, 2023**

The Corporation of the Catholic Archdiocese of Seattle (CCAS) is a not-for-profit organization organized under the law of the State of Washington. It encourages the solicitation and acceptance of gifts for purposes that will further the mission of the Catholic Church in Western Washington.

The following policies govern acceptance of gifts made to the Archdiocese or for the benefit of its parishes, schools, or programs, including agencies that fall under the umbrella of the CCAS.

#### **Purpose:**

The purpose of this gift acceptance policy is to provide guidelines to representatives of the Archdiocese who may be involved in the acceptance of gifts, to outside advisors who may assist in the planning process, and to prospective donors who may wish to make gifts to the Archdiocese. This policy is intended only as a guide and allows for some flexibility on a case-by-case basis.

### **Gift Acceptance Committee**

Any questions which may arise in the review and acceptance of gifts to the Archdiocese will be referred to the Gift Acceptance Committee. Members of the Committee are appointed by and

serve at the pleasure of the Archbishop of Seattle. The committee is responsible for evaluating and accepting or denying any gifts made to the Archdiocese.

# **Use of Legal Counsel**

The Archdiocese may seek the advice of legal counsel in matters relating to the acceptance of gifts when appropriate. Review by counsel is recommended for:

- 1. Closely held stock subject to buy-sell agreements or other restrictions.
- 2. Any gift where the Archdiocese assumes an obligation or potential liability.
- 3. Transactions that involve conflicts of interest
- 4. Gifts naming the Foundation as trustee.

#### **Conflicts of interest**

The Archdiocese will not provide legal counsel for potential donors and benefactors to seek advice regarding financial, tax, and legal advisors for all matters relating to gifts to the organization prior to the gift being made. Additionally, all staff and volunteers will conduct themselves in a prudent manner, to avoid any actual or perceived conflicts of interest relating to the acceptance of gifts to the Archdiocese.

#### Confidentiality

All information obtained from or about donors/prospects shall be held in the strictest confidence by the Archdiocese and its staff and volunteers. Neither the name, the amount nor the condition of any gift shall be published without the express written or oral approval of the donor.

#### Cash

- Unconditional gifts of cash and by check shall be accepted by the Archdiocese regardless of the amount, unless otherwise determined by the Gift Acceptance Committee
- 2. Checks shall be made payable to the Archdiocese of Seattle or a specific parish, school, or other agency under the Archdiocese of Seattle. In no event shall a gift intended for the Archdiocese be made directly to an individual who represents the Archdiocese in any capacity, or to a financial institution serving the Archdiocese.

# **Publicly Traded Securities**

- 1. Readily marketable securities, such as those traded on a stock exchange, may be accepted by the Archdiocese.
- 2. For gift crediting and accounting purposes, the value of the gift of securities is the average of the high and low prices on the date the gift was received.
- 3. Gifts of securities, in kind or in certificate form, will be given to the Archdiocese investment manager who will sell all securities within 7 days and apply the proceeds to the designated program/fund.

# **Closely Held Securities**

- 1. Non publicly traded securities may be accepted after consultation with the Gift Acceptance Committee. The Committee should seek counsel from an outside advisor when evaluating the potential gift.
- Prior to acceptance, the Committee will explore methods and timing of liquidation of the securities through redemption or sale. A determination of the following should be made:
  - a. An estimate of fair value market
  - b. Any restrictions on transfer
  - c. Whether and when an initial public offering might be anticipated

#### **Real Estate**

- 1. Any gift of real estate must be reviewed by the Gift Acceptance Committee. The Committee may seek counsel from an outside advisor when evaluating the gift. The Committee will inquire as to:
  - a. Usefulness of the property to the Foundation mission
  - b. Marketability
  - c. Environmental hazards
  - d. Carrying costs
  - e. Restrictions, easements, or other limitations.
- 2. The donor may assist in the process by providing an appraisal of the property. Any appraisal should be performed by an independent professional real estate appraiser.
- 3. The Archdiocese reserves the right to require an environmental assessment of any potential real estate gift.
- 4. The donor may be asked to pay for all or a portion of the following as a condition of accepting the gift:
  - a. Maintenance costs

- b. Real estate taxes
- c. Insurance
- d. Real estate broker's commission and other costs of sale
- e. Appraisal costs
- 5. For gift crediting and accounting purposes, the value of the gift is the appraised value of the real estate; however, this value may be reduced by costs of maintenance, insurance, real estate taxes, broker's commission and other expenses of the sale.

# **Tangible Personal Property**

- 1. A gift of tangible personal property with an estimated value over \$10,000 and not used in the ordinary course of business shall be referred to the Gift Acceptance Committee prior to acceptance.
- 2. A gift of jewelry, vehicles, artwork, collections, equipment, software or similar shall be assessed for its value to the Archdiocese which may be realized either by being sold or being used in connection with the mission of the Archdiocese.
- 3. Depending upon the anticipated value of the gift, a qualified outside appraiser may be asked to determine its value. Any such property shall be received by description until its true value shall be determined through sale.
- 4. The Archdiocese will adhere to all IRS requirements relating to disposing of gifts of tangible personal property and will provide appropriate forms to the donor and IRS.

#### **Restricted Gifts**

The Archdiocese may accept restricted gifts and gifts for specific programs and purposes provided that such gifts are not inconsistent with the stated mission, purposes, and priorities of the Archdiocese. The Archdiocese will not accept gifts deemed to be too restrictive in purpose. These are gifts that are too difficult to administer or for gifts outside of the mission of the Archdiocese. All final decisions on the restrictive nature of a gift, and its acceptance or refusal, shall be made by the Gift Acceptance Committee.

Endowments gifts will be accepted with a \$50,000 minimum.

# **Adoption of Gift Acceptance Policy**

Final approval of these policies and guidelines is hereby given.

	Date:	
The Most Reverend Paul D. Eitienne, D.D, S.T.L.		
Archbishop of Seattle		