

## **15401.00 | Fundraising - Matching Gifts**

**Effective Date:** 9/1/2014 | **Revised Date:** 9/1/2014

### **POLICY OBJECTIVE**

It is the policy of the California State University (CSU) to accept matching gifts in compliance with eligibility requirements. Matching gift programs issue conditional gifts to fulfill certain purposes. By completing an appropriate matching gift claim, the recipient organization acknowledges that it understands the conditions of the program and to the - best of its knowledge - the request submitted fulfills those conditions. Each campus is required to develop written procedures, consistent with this policy.

### **POLICY STATEMENT**

#### **100 PURPOSE**

The purpose of this policy is to establish proper internal controls for the acceptance of matching gifts. It is guided by industry best practices published by the Council for Advancement and Support of Education.

#### **200 SCOPE**

This policy governs matching gift acceptance by the university and its auxiliaries.

#### **300 AUTHORITY**

Authority to this policy is pursuant to Education Code section 89720. This policy is issued under delegation of authority from the Chancellor to the Vice Chancellor, University Relations and Advancement, and implementation and compliance with the policy is further delegated to the campus chief advancement officer. California Education Code 89035.

#### **400 DEFINITIONS**

**401 Approving Authority** - a person to whom authority has been delegated in writing to certify matching gift claims. This approving function shall be segregated from the record keeping function which, among other duties, ensures matching gifts are designated in accordance with donor intent.

**402 Donee** - the entity receiving both the donor gift establishing eligibility for a matching gift program and the conditional gift distributed by the matching gift program. Though it is customary for donor gifts to be accepted by an authorized auxiliary organization, the donee may be the university.

**403 Matching Gift Claim** - the certification form, either paper or electronic, submitted to the matching gift program acknowledging the receipt of a donor gift, certifying the charitable status of the donee, and providing any additional information requested by the matching gift company. As determined by the matching gift company, this claim may be the responsibility of the donor without any action required by the donee.

**403 Qualifying Gift** - the donor gift received from an individual eligible to participate in a matching gift program, provided for an eligible purpose, and given to an eligible donee. As determined by the matching gift company, a qualifying gift may be monetary, in-kind, or volunteer hours.

#### **500 INTERNAL CONTROLS**

##### **501 Board Responsibility**

The governing board of the recipient organization should ensure that internal controls of gifts are sufficient to protect the assets and reputation of the CSU.

##### **502 Chief Executive's Responsibility**

The chief executive officer of the recipient organization should establish the administrative structure and general procedures to achieve appropriate internal controls.

### **503 Approving Authority Responsibilities**

Where the recipient organization is expected to act on a qualifying gift and submit a claim or application, this individual should:

- A. Verify receipt of the qualifying gift, review eligibility requirements when provided, and review documentation requested by the matching gift company.
- B. Make appropriate inquiries and document matching gift eligibility when the:
  - a. source of funds is other than the employee/retiree such as a donor advised fund, United Way, or a relative.
  - b. qualifying gift includes personal benefits such as memberships or tickets to a fundraising event, performance, or athletic game.
  - c. donor requests in writing that the matching gift be designated for a purpose that differs from the qualifying gift designation.
- C. Transmit matching gift claim, thereby certifying review of the qualifying gift.
- D. Submit to the record keeper documentation of the matching gift claim.
- E. Be available for questions concerning transactions, and communicate with the donor and matching gift program as appropriate in confirming transactions.
- F. Review gift record on at least an annual basis to determine whether follow-up action is required, whether the claim should be recorded as uncollectable and whether received matching gifts were properly assigned.

### **504 Record Keeping Responsibilities**

Record keeping responsibilities may be assigned to one or more staff members and should include:

- A. Maintaining records of donor contributions and matching gifts in such a manner that there is a clear record of the qualifying gift, the related matching gift, and the designated purposes.
- B. Secondary review of matching gift eligibility for situations outlined in section 503 B. Documentation of this eligibility review shall be maintained for three years.

### **600 ACCOUNTING TREATMENT**

Matching gift claims should not be treated as pledge receivables. Matching gifts are accounted for when received.