

# Chicago Public Media.

## Gift Acceptance Policy

Chicago Public Media, Inc., (“CPM”), a not for profit corporation organized under the laws of the State of Illinois, approves and adopts this policy to govern the acceptance of gifts from individuals, partnerships, corporations, government agencies and foundations.

### I. Purpose

The Board of Directors of CPM and CPM staff solicit gifts to secure the future growth of CPM and to support its mission. The following general guidelines apply to the acceptance of gifts:

- CPM solicits and accepts gifts that are consistent with and supportive of its mission and values.
- CPM solicits and accepts gifts from individuals, partnerships, corporations, government agencies, foundations or other entities, without limitation.
- CPM accepts gifts of cash, real property, personal property, stocks and bonds, and in-kind services.

CPM urges all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to their gifts, including the resulting tax and estate planning consequences. CPM is prohibited from providing such advice directly to donors.

### II. The Gift Acceptance Committee

CPM shall constitute a Gift Acceptance Committee (“GAC”). Members of the committee shall include the President & CEO, the Vice President of Development, the Vice President of Finance, the General Counsel and such other members as appointed by the President & CEO on a temporary or permanent basis. For gifts in excess of \$50,000 in value, the GAC shall include the Chair of the Development Committee of the Board as a member. The GAC is charged with the responsibility of screening, reviewing and accepting or rejecting gifts consistent with the terms of this policy.

The GAC may call for further legal review of certain gifts including:

- Gifts of securities that are subject to restrictions or buy-sell agreements.
- Documents naming CPM as trustee or requiring CPM to act in any fiduciary capacity.
- Gifts requiring CPM to assume financial or other obligations or sign legal commitments.

- Transactions giving rise to potential conflicts of interest.
- Gifts of property that may be subject to environmental or other regulatory restrictions.

### III. Restrictions on Gifts

CPM will not accept gifts that in the opinion of legal counsel: (a) Would result in violation of CPM's corporate charter; (b) Would result in CPM losing its status as an IRS 501(c)(3) public charity; (c) Are inordinately challenging or expensive to administer in relation to their value; (d) Would result in any unacceptable consequences for CPM; (e) Are unrelated to CPM's mission or inconsistent with its values; (e) Are inconsistent with the terms of this policy.

### IV. Types of Gifts

#### 1. Gifts Generally Accepted Without Prior Review

Subject to the restrictions on gifts enumerated in Section III of this policy, gifts described in this Section will be accepted without prior review of the GAC provided that they are unrestricted as to date, time or purpose and are not solicited in connection with a specific fundraising campaign or purpose. Unless otherwise specified by the terms of the gift, once accepted, allocation of the funds to an operating, investment or endowment account will be within the sole discretion of the GAC.

- *Cash*. Cash gifts are acceptable in any form, including by check, money order, credit card, or online. Donors wishing to make a gift by credit card must provide the card type (e.g., Visa, MasterCard, American Express), card number, expiration date, and name of the card holder as it appears on the credit card.
- *Marketable Securities*. Marketable securities may be transferred electronically to an account maintained at BMO Harris Bank or such other bank as specified by the GAC. All marketable securities will be sold promptly upon receipt unless otherwise directed by the GAC.
- *Bequests and Beneficiary Designations through Revocable Trusts, Life Insurance Policies, Commercial Annuities and Retirement Plans*. Donors may make bequests to CPM through their wills and may name CPM as the beneficiary of trusts, life insurance policies, commercial annuities, and retirement plans. Unless otherwise specified by the bequest or gift, use of the funds will not be restricted to any particular purpose.
- *Charitable Remainder Trusts*. CPM will accept designation as a remainder beneficiary of charitable remainder trusts.
- *Charitable Lead Trusts*. CPM will accept designation as an income beneficiary of charitable lead trusts.
- *Donor Advised Funds*. CPM will accept grants from Donor Advised Funds.

## 2. Gifts Accepted Subject to Prior Review

Gifts described below will be subject to further review by the GAC prior to acceptance due to the unique circumstances, liabilities or requirements they may pose. These include:

- *Restricted Securities.* In some cases marketable securities may be restricted, for example, by applicable securities laws or the terms of the proposed gift; in such instances the decision as to acceptance of the restricted securities shall be made by the GAC.
- *Tangible Personal Property.* The GAC shall review and determine whether to accept any gifts of tangible personal property in light of the following considerations: does the property further the organization's mission? Is the property marketable? Are there any unacceptable restrictions imposed on the property? Are there any carrying costs for the property for which the organization may be responsible? Is the ownership and title of the property clear?
- *Life Insurance.* CPM will accept gifts of life insurance where CPM is named as both beneficiary and irrevocable owner of the insurance policy. The donor must agree to pay, before due, any future premium payments owing on the policy. If the donor does not elect to continue to pay the premiums, CPM may continue to pay the premiums or convert the policy to paid up insurance.
- *Real Estate.* Prior to acceptance of any gift of real estate other than a personal residence, CPM shall require an initial environmental review by a qualified environmental firm to be completed at donor's cost. In the event that the initial review reveals a potential problem, the organization may retain a qualified environmental firm to conduct an environmental audit. Criteria for acceptance of gifts of real estate include: Does the environmental review or audit reflect that the property is damaged or otherwise requires remediation? Is the property useful for the organization's purposes? Is the property readily marketable? Are there covenants, conditions, restrictions, reservations, easements, encumbrances, or other limitations associated with the property? Are there carrying costs (including insurance, property taxes, mortgages, notes, or the like) or maintenance expenses associated with the property?

## V. Miscellaneous Provisions

- *Document Retention.* Documents relating to gifts accepted under this policy shall be maintained by the Development Department of CPM and shall be retained in accordance with the terms of CPM's Document Retention Policy.
- *Securing appraisals and legal fees for gifts to CPM.* It will be the responsibility of the donor to secure an appraisal (where required) and independent legal counsel for advice relating to gifts made to the CPM.
- *Valuation of gifts for development purposes.* CPM will record a gift received by CPM at its valuation for gift purposes on the date of gift.

- *IRS Filings upon sale of gift.* CPM is responsible for complying with IRSs requirements upon the sale of gift items.
- *Acknowledgement.* Acknowledgment of all gifts made to CPM and compliance with the current IRS requirements in acknowledgement of such gifts shall be the responsibility CPM.
- *Modifications to this policy.* The Finance Committee will review this Gift Acceptance Policy on a periodic basis and will propose modifications to the Board of Directors. All modifications of this policy must be approved by the Board.

#### VI. Approval of this Policy and Amendments

This Policy was approved by the Finance Committee on June 6, 2017 and was approved and adopted by the Board of Directors of CPM on the date stated below. This Policy will be reviewed from time to time by the Finance Committee. Amendments to this Policy will be approved by the Finance Committee and approved and adopted by the Board of Directors.

Approved and adopted by the Board of Directors on this 20<sup>th</sup> day of June, 2017.