

## **Gift Acceptance Policy**

The mission of Braven is to empower promising college students who are the first in their family to go to college or who have limited financial resources with the skills, networks, confidence, and experience necessary to transition from college to strong first jobs, which lead to meaningful careers and lives of impact. Our vision is that the next generation of leaders will emerge from everywhere and be ready for whatever our future demands.

Philanthropic contributions have and will continue to be critical to our ability to advance our mission. Our work would not be possible without the generosity of our donors. We believe, in the long term, philanthropy will always be about one-third of our operating budget. In the short term, as we are working towards scale, philanthropy plays an even greater catalytic role for our organization.

The Gift Acceptance Policy provides guidelines to representatives of Braven, Inc. who may be involved in the acceptance of gifts, to outside advisors who may assist in the gift planning process and to prospective donors who may wish to make gifts to the organization. What follows is an explanation of the types of funding we accept, our processes for maintaining financial integrity, and what donors should expect. This policy is intended only as a guide and allows for some flexibility on a case-by-case basis. Above all, Braven will make decisions that prioritize our ability to best serve our organization and our Fellows.

#### **General Rules**

These conditions apply to all gifts:

- The donor irrevocably transfers ownership and control over the funds to Braven.
- We believe in transparency regarding our philanthropic support (see below for more details).
- Accepting a gift is not a sign that Braven endorses a donor, organization, or viewpoint.
- We do not accept gifts from political parties, candidates, or nonprofit organizations closely aligned with them.
- We reserve the right to reject any gift that we feel would compromise our integrity or harm our financial sustainability.
- All gifts at or above \$10M (at one-time) must be approved by Braven's National Board.

#### **Gift Acceptance Committee**

Braven's Gift Acceptance Committee ("GAC") shall be utilized to determine if it is in Braven's best interest to accept a gift which may fall outside the usual standards by which gifts are received. The GAC shall be composed of the following individuals:

- 1. Senior Director of Development
- 2. Chief External Affairs Officer
- 3. Chief Financial Officer
- 4. Controller
- 5. General Counsel



6. Executive Director (for regionally directed gifts)

As a matter of regular practice, the Senior Director of Development, in conjunction with the General Counsel and Controller, will review all gifts and grants. The Senior Director of Development shall notify the Chief External Affairs Officer of any actual or potential gift that in their judgment should be reviewed by the GAC per the guidelines in this policy.

The GAC will work to reach a unanimous decision as to whether the proposed gift will be accepted. In the event that the GAC is unable to come to a decision regarding a potential gift, the Board Chair and Treasurer will be consulted, and the Chief Executive Officer will make a final determination.

## The Types of Funding We Accept

Braven accepts financial support from an individual, foundation, corporation, government or other entity for the following:

#### **General operating support**

Donations to support any ongoing needs of the organization. All donors acknowledge that the use of their gifts is at the discretion of Braven.

# Specific areas of operation

Braven accepts gifts to support specific regions or special initiatives.

Braven has full authority to decide the priorities of these teams or the employment of specific staff members.

#### **Procedures**

Braven accepts the following gifts:

- We accept cash via
  - Check or ACH/wire transfer
  - Online donation via our website or PayPal
- We accept securities (e.g. stock or mutual fund transfer), which will be sold immediately upon receipt
- We accept crypto currency that is currently tradable. Due to the volatility of crypto currency, all gifts will be sold as soon as possible upon receipt
- We accept donations via employer matches and employer giving websites, such as Benevity and Frontstream
- We accept gifts via Donor Advised Funds
- We may accept tangible personal property (e.g. jewelry or artwork), which will be sold based upon FMV as quickly as is practical upon receipt
- We accept bequests and gifts made via donor estate planning and will review the terms of those gifts per this policy

Directions can be found on the website at: <a href="https://braven.org/donate/">https://braven.org/donate/</a>. Donors, grant makers, and supporters should address questions or concerns about gifts to the Senior Director of Development at <a href="mailto:giving@bebraven.org">giving@bebraven.org</a>.



All staff are instructed to direct gift inquiries to the Senior Director of Development. If a gift does not meet the above criteria, the Gift Acceptance Committee will meet and review, and reserves the right to accept or refuse a gift.

## The Types of Funding We Do Not Accept

Braven will not accept gifts that violate the terms of our certificate of incorporation or by-laws, or gifts that do or could violate local, state or federal law.

We reserve the right to refuse or return any gift from an individual, foundation, corporation, government or other entity that:

- is inconsistent with our mission or values
- could cause a conflict of interest
- could expose Braven to liability or adverse publicity
- is prohibitively restrictive in its use of funds
- infringes on Braven's ability to provide services
- Braven deems have an extreme administrative burden

At the present time, Braven does not accept real estate (e.g. land, commercial properties, or houses) or vehicles (e.g. boats, cars).

## **Transparency**

Braven is dedicated to transparency in regard to philanthropic support. We also respect donors who wish to remain anonymous to the extent permitted by law.

We disclose our relationships with all donors in the following ways:

- The names of all donors, their gift amount, and its purpose will be tracked in Salesforce at the time that the gift is made. This record of the gift will stay in Salesforce indefinitely.
- All gifts over \$5,000 are reported to the IRS on Schedule B of Form 990 with donor name and amount; however, Schedule B is not publicly available for 501(c)(3) organizations like Braven.
- The names of all current donors above a certain giving amount will be listed on our website, in our annual Jobs Report, typically published in February, and in our Impact Report, typically published in September. Donors that do not wish to be acknowledged will be listed as "Anonymous" in public communications.
- More prominent disclosures may be made in instances when Braven's leadership believes they are warranted.

#### **Updates to this Policy**

This Gift Acceptance Policy will be reviewed at least once a year by the Gift Acceptance Committee. Updates, if applicable, will be approved by the National Board, then posted online and made available to donors.

# **Rights of Donors**

Braven is guided by this amended version of the <u>Donor Bill of Rights</u>, created by the Association of Fundraising Professionals, the Association for Healthcare Philanthropy, the Council for the Advancement and Support of Education, and the Giving Institute.



Philanthropy is based on voluntary action for the common good. It is a tradition of giving and sharing that is primary to the equality of life. To assure that philanthropy merits the respect and trust of the public, and that donors and prospective donors can have full confidence in the organizations and causes they are asked to support, we declare that all donors have the following rights:

- To be informed of the organization's mission, of the way the organization intends to use donated resources, and of its capacity to use donations effectively for their intended purposes.
- 2. To be informed of the identity of those serving on the organization's governing board and to expect the board to exercise prudent judgment in its stewardship responsibilities.
- 3. To have access to the organization's summary financial data.
- 4. To be assured their gifts will be used for the purpose for which they were given.
- 5. To receive appropriate acknowledgement and recognition.
- 6. To be assured that information about their donation is handled with respect and confidentiality to the extent provided by law.
- 7. To expect that all relationships with individuals representing organizations of interest to the donor will be professional in nature.
- 8. To be informed whether those seeking donations are volunteers, employees of the organization, or hired solicitors.
- 9. To have the opportunity for their names to be deleted from mailing lists that an organization might intend to share.
- 10. To feel free to ask questions when making a donation and to receive prompt, truthful, and forthright answers.



#### Reference

- The Chronicle of Philanthropy's Gift Acceptance Policy
- Gift Acceptance Policies | National Council of Nonprofits
  - At the bottom of the page are a few samples. The MITA one is pretty comprehensive, though maybe a little outdated, but includes language about restricted gifts, conflicts of interest, etc.
- The Lesbian, Gay, Bisexual and Transgender Community Center Gift Acceptance Policy
- Spelman College, Delaware State University, Rutgers University, and Harvard University

## Steps in Review

- Hold annual meeting in September / October (lead by Development team with General Counsel, Finance, and Chief External Affairs Officer representation)
- Create a new copy and make changes in suggesting mode; codify new version in annual meeting
- If there are major updates, we can choose to ask board chair to review; circulate to national board for input as needed and then GAC determines updates to make, if any, to finalize policy for the next year
- Post updated version to website
- Link prior version in this doc:
  - Prior Version: Gift Acceptance Policy September 2024