NORTHWEST OREGON WORKS	**POLICY F03: GIFT AND DONATION ACCEPTANCE**
	APPROVED: 7/22/2016 **REVISION:** **APPROVED BOARD REVISION:** **INTERNAL REVIEW CONDUCTED: 6/15/2025**
	❒ **NEW** ❒ **REVISED**

PURPOSE
To communicate requirements for the acquisition, management, and inventory of property, other than real property.

POLICY
Oregon Northwest Workforce Investment Board doing business as Northwest Oregon Works (NOW) solicits and accepts gifts and donations for purposes that will help the organization further and fulfill its mission. NOW urges all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to their gifts and donations, including the resulting tax and estate planning consequences.

NOW will provide acknowledgments to donors meeting IRS substantiation requirements for property received by NOW as a gift or donation. However, except for gifts and donations of cash and publicly traded securities, no value shall be ascribed to any receipt or other form of substantiation of a gift received by NOW.

NOW will respect the intent of the donor relating to gifts for restricted purposes and those relating to the desire to remain anonymous. With respect to anonymous gifts, NOW will restrict information about the donor to only those staff members with a need to know.

NOW will not compensate, whether through commissions, finders' fees, or other means, any third party for directing a gift, donation or donor to NOW.

Restrictions on Gifts and Donations
NOW will not accept gifts that (a) would result in NOW violating its corporate charter, (b) would result in NOW losing its status as a 501(c)(3) not-for-profit organization, (c) are too difficult or too expensive to administer in relation to their value, (d) would result in any unacceptable consequences for NOW, or (e) are for purposes outside NOW's mission. Decisions on the restrictive nature of a gift, and its acceptance or refusal, shall be made by the Executive Committee, in consultation with the Executive Director.

Gifts Generally Accepted Without Review

Cash. Cash gifts and donations are acceptable in any form, including by check, money order, credit card, or on-line.

In-Kind Services. Gifts or donations of in-kind services will be accepted at the discretion of the Executive Director.

Gifts Accepted Subject to Prior Review

Certain forms of gifts or donated properties may be subject to review by Executive Committee prior to acceptance. Examples of gifts and donations subject to prior review include, but are not limited to:

Marketable Securities. All marketable securities will be sold promptly upon receipt unless otherwise directed by the Executive Committee. 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 whether to accept the restricted securities shall be made by the Executive Committee.

Bequests and Beneficiary Designations under Revocable Trusts, Life Insurance Policies, Commercial Annuities and Retirement Plans. Donors are encouraged to make bequests to NOW under their wills, and to name NOW as the beneficiary under trusts, life insurance policies, commercial annuities and retirement plans.

Charitable Remainder Trusts. NOW will accept designation as a remainder beneficiary of charitable remainder trusts.

Charitable Lead Trusts. NOW will accept designation as an income beneficiary of charitable lead trusts.

Tangible Personal Property. The Executive Committee shall review and determine whether to accept any gifts or donations 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 title/provenance of the property clear?

Life Insurance. NOW will accept gifts and donations of life insurance where NOW 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.

Real Estate. All gifts of real estate are subject to review by the Executive Committee. Prior to acceptance of any gift of real estate other than a personal residence, NOW shall require an initial environmental review by a qualified environmental firm. 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: 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? Does the environmental review or audit reflect that the property is damaged or otherwise requires remediation?

Use of Legal Counsel
NOW will seek the advice of legal counsel in matters relating to acceptance of gifts and donations when appropriate. Review by counsel is recommended for:

- Gifts and donations of securities that are subject to restrictions or buy-sell agreements.
- Documents naming NOW as trustee or requiring NOW to act in any fiduciary capacity.
- Gifts requiring NOW to assume financial or other obligations.
- Transactions with potential conflicts of interest.
- Gifts of property which may be subject to environmental or other regulatory restrictions.

References
2CFR 200.434