APPA GIFT ACCEPTANCE POLICY

I. PURPOSE

This Gift Acceptance Policy establishes guidelines for accepting, managing, and acknowledging gifts to APPA. The purpose of this policy is to:

- Welcome and facilitate gifts that support APPA's mission and advance the Association's strategic priorities
- Provide clear guidance to donors, Board members, and staff regarding acceptable gifts and gift terms
- Protect the Association's tax-exempt status and financial integrity
- Ensure gifts align with APPA's mission, values, and organizational capacity
- Establish appropriate due diligence and decision-making processes
- Foster positive relationships with donors while maintaining appropriate boundaries
- Promote transparency and accountability in gift acceptance and management

APPA values the generosity of donors who support the Association's work and is committed to responsible stewardship of all contributed resources. This policy ensures that gifts advance APPA's mission of developing facilities leadership and promoting excellence in educational facilities management, while protecting the Association from gifts that could create undue burden, liability, or conflict with organizational values.

II. SCOPE AND DEFINITIONS

Scope

This policy applies to all gifts made to APPA, including gifts designated for general operating support, specific programs, restricted purposes, or endowment. This policy covers gifts from individuals, corporations, foundations, and other entities.

Definition of a Gift

A gift is a voluntary transfer of assets to APPA with no expectation of goods, services, or other benefits in return (beyond standard donor recognition). Gifts are irrevocable, tax-deductible contributions made to support APPA's mission.

Transactions Not Covered by This Policy

The following are not considered gifts and are not governed by this policy:

- Membership dues: Payment for membership benefits and services (governed by Membership Policy)
- Conference registrations and event fees: Payment for attendance at conferences, workshops, or other events
- Program fees: Payment for educational programs, certification, publications, or other services

- Sponsorships with commercial benefits: Payments that include advertising, booth space, attendee lists, or other tangible business benefits (these are commercial transactions, not gifts)
- Grants requiring specific deliverables: Funding contingent on APPA producing specific outputs or services for the grantor
- Quid pro quo transactions: Any payment where the donor receives goods or services of equivalent value

Distinguishing Gifts from Commercial Transactions

When a transaction includes elements of both a gift and a purchase:

- If the payment exceeds the fair market value of goods/services received, the excess may be treated as a gift (subject to IRS regulations)
- APPA will clearly communicate to the payer what portion (if any) is tax-deductible

III. GIFT ACCEPTANCE PRINCIPLES

APPA accepts gifts that advance the Association's mission, support strategic priorities, and can be stewarded responsibly. APPA generally does not accept gifts of real estate or tangible property unless approved by the Board. All gift acceptance decisions are guided by the following core principles:

Mission Alignment

Gifts must support APPA's mission of developing facilities leadership and promoting excellence in educational facilities management. Gifts that would require the Association to engage in activities inconsistent with its tax-exempt purposes or that would compromise its independence will be declined.

Strategic Value

Gifts should advance APPA's strategic priorities and provide meaningful benefit to the Association and its members. The potential impact and value of a gift will be weighed against the resources required to accept, administer, and steward it.

Financial Prudence

APPA will consider the total cost of accepting, maintaining, and managing a gift, including:

- Direct costs (appraisals, legal fees, environmental assessments, insurance, taxes)
- Staff time and administrative burden
- Ongoing obligations or liabilities
- Marketability and liquidity considerations

Gifts that create undue financial burden or risk will be declined, even if well-intentioned.

Legal and Ethical Compliance

All gifts must comply with applicable federal, state, and local laws, IRS regulations governing charitable contributions, and professional fundraising standards. APPA will not accept gifts that:

- Violate laws or regulations
- Create conflicts of interest that cannot be appropriately managed
- Compromise the Association's tax-exempt status
- Involve illegal activities or proceeds from illegal activities

Donor Intent and Restrictions

APPA respects donor intent and will honor reasonable restrictions that align with the Association's mission and priorities. However, APPA reserves the right to:

- Decline gifts with restrictions that are too narrow, impractical to administer, or inconsistent with organizational needs
- Negotiate modifications to proposed restrictions that would better serve both donor intent and organizational effectiveness
- Require minimum gift amounts for establishing restricted funds to ensure administrative efficiency

Donors may not retain control over contributed assets or their investment or use.

Organizational Capacity

APPA will realistically assess its capacity to administer and steward gifts appropriately. Gifts requiring expertise, systems, or resources beyond the Association's capabilities may be declined or deferred until appropriate capacity can be developed.

Transparency and Accountability

Gift acceptance decisions will be made through established processes with appropriate documentation. APPA maintains transparency with donors regarding gift acceptance criteria, use of contributions, and stewardship practices.

Donor Relationships

APPA values donor relationships and treats all prospective donors with respect and professionalism. When gifts cannot be accepted, staff will communicate decisions promptly and courteously, and will work to identify alternative ways the donor might support the Association's mission.

IV. TYPES OF ACCEPTABLE GIFTS

APPA accepts various types of gifts to support its mission and programs. This section establishes criteria and procedures for accepting different asset types. All gifts are subject to the principles outlined in Section III.

A. Cash and Cash Equivalents

Cash gifts are the most common and preferred form of contribution. APPA accepts:

- Checks made payable to APPA

- Wire transfers to APPA's bank account
- Credit card payments through approved processors
- Electronic funds transfers (ACH)

Acceptance Authority: The CEO or designated staff may accept all cash gifts.

Processing: All cash gifts are deposited promptly and acknowledged in accordance with IRS requirements. Donors receive written acknowledgment for gifts of $250 or more.

Foreign Currency: Cash gifts in foreign currencies may be accepted subject to evaluation of conversion costs and exchange rate risks. The donor is responsible for all conversion fees and bank charges.

B. Securities (Publicly Traded)

APPA accepts gifts of publicly traded securities, including stocks, bonds, and mutual funds traded on recognized exchanges.

Acceptance Criteria:

- Securities must be readily marketable on a recognized exchange
- Securities must be transferable without restrictions
- APPA reserves the right to decline securities that pose reputational risk or are inconsistent with the Association's values

Acceptance Authority: The CEO may accept gifts of publicly traded securities.

Valuation: Gifts of securities are valued at the average of the high and low trading prices on the date of transfer (the date the securities are transferred into APPA's account).

Processing:

- Donors should contact APPA staff before initiating transfers to obtain account information and transfer instructions
- Securities are typically sold promptly upon receipt to minimize market risk and convert to cash for programmatic use
- APPA does not provide investment advice to donors and encourages donors to consult their own financial advisors regarding tax implications

Donor Tax Deduction: The donor's charitable deduction is generally based on the fair market value of the securities on the date of transfer. Donors should consult their tax advisors.

IRS Reporting: For gifts of securities valued at more than $5,000, donors are responsible for obtaining qualified appraisals. APPA will complete IRS Form 8283 Section B as required.

V. AUTHORITY TO ACCEPT GIFTS

APPA establishes clear authority levels for gift acceptance decisions to ensure appropriate oversight while maintaining operational efficiency. Authority to accept gifts is based on both the gift amount and the complexity or risk associated with the gift.

CEO Authority

The CEO has authority to accept the following gifts without Board approval:

- All cash and cash equivalent gifts up to $25,000
- Publicly traded securities with a value up to $25,000
- Any other routine gifts with a value up to $25,000

Board of Directors Approval Required

The following gifts require approval by the Board of Directors (or Executive Committee if delegated by the Board):

- Any gift with a value exceeding $25,000
- Any gift with complex terms, unusual restrictions, or significant administrative requirements
- Any gift that creates potential liability, reputational risk, or ongoing obligations
- Any gift from a donor where a conflict of interest exists or may be perceived
- Any gift that would require APPA to deviate from established policies

Delegation to Executive Committee

The Board of Directors may delegate authority to the Executive Committee to approve gifts requiring Board-level review when timing does not permit full Board consideration. All such approvals shall be reported to the full Board at its next meeting.

Consultation Requirements

Regardless of approval authority, the CEO shall consult with legal counsel when:

- Gift terms are complex or unclear
- Potential legal, tax, or regulatory issues exist
- Conflicts of interest are present
- Gift acceptance could create liability or reputational risk

Right to Decline

APPA reserves the right to decline any gift, regardless of size or type, that does not align with the Association's mission, values, or strategic priorities, or that would create undue burden, liability, or risk.

VI. DUE DILIGENCE AND EVALUATION

APPA conducts appropriate due diligence before accepting gifts to protect the Association's interests and ensure responsible stewardship of contributed assets.

Assessment Criteria

All gifts are evaluated based on the following factors:

- Mission Alignment: Does the gift support APPA's mission and strategic priorities?

- Financial Impact: What are the net financial benefits after considering all costs?
- Administrative Burden: Does APPA have the capacity and expertise to administer the gift appropriately?
- Legal and Tax Compliance: Does the gift comply with applicable laws and regulations?
- Restrictions: Are any donor restrictions reasonable, practical, and consistent with organizational needs?
- Reputation and Values: Is the gift consistent with APPA's values and reputation?
- Marketability: For non-cash gifts, can the asset be readily converted to cash if needed?

Due Diligence for Securities

For gifts of publicly traded securities, APPA staff will:

- Verify that securities are freely tradable without restrictions
- Confirm transfer instructions and account information
- Monitor receipt of securities and coordinate prompt sale
- Obtain documentation for IRS reporting requirements

Conflict of Interest Review

When a proposed gift involves a Board member, officer, key employee, or their related parties, the gift will be reviewed in accordance with APPA's Conflict of Interest Policy. The individual with the potential conflict must:

- Disclose the conflict to the CEO or Board Chair
- Recuse themselves from discussions and decisions regarding the gift
- Abstain from voting on acceptance of the gift

Documentation

APPA will maintain appropriate documentation for all gifts, including:

- Donor correspondence and gift agreements
- Gift valuation documentation
- IRS forms (acknowledgment letters, Form 8283, etc.)
- Board meeting minutes documenting approval decisions
- Due diligence reports and assessments

All gift records will be retained in accordance with APPA's document retention policy.

When to Decline Gifts

APPA will decline gifts when:

- The gift does not further the Association's mission or strategic priorities
- The cost to accept, administer, or manage the gift exceeds its value
- The gift creates unacceptable legal, financial, or reputational risk

- Donor restrictions are too narrow, burdensome, or inconsistent with organizational needs
- The gift involves conflicts of interest that cannot be appropriately managed
- APPA lacks capacity to steward the gift appropriately
- The donor seeks inappropriate control or involvement in the use of the gift

VII. RESTRICTIONS AND CONDITIONS

APPA respects donor intent and will honor reasonable restrictions that align with the Association's mission and strategic priorities. However, APPA reserves the right to negotiate restrictions or decline gifts that create undue administrative burden or limit organizational flexibility.

Acceptable Restrictions

APPA may accept gifts with the following types of restrictions:

- Program-Specific: Gifts designated for specific APPA programs, initiatives, or activities that align with the Association's mission
- Purpose-Specific: Gifts designated for specific purposes such as scholarships, research, conferences, or professional development
- Geographic: Gifts designated to benefit specific regions or chapters, provided such restrictions are consistent with organizational structure
- Time-Limited: Gifts to be used within a specified timeframe, provided the timeframe is reasonable and achievable

Unrestricted Gifts

Unrestricted gifts provide maximum flexibility and are strongly encouraged. Unrestricted gifts allow APPA to direct resources where they are most needed and respond to changing priorities and opportunities.

Unacceptable Restrictions

APPA will not accept gifts with restrictions that:

- Are inconsistent with APPA's mission, values, or tax-exempt purposes
- Are overly narrow or so specific that they cannot be reasonably fulfilled
- Require APPA to take positions on legislative or political matters
- Give the donor or their designees ongoing control over use of funds or investment decisions
- Require perpetual administration that is impractical or economically unviable
- Conflict with APPA's policies or operational practices
- Would require APPA to discriminate in violation of law or organizational policy

Negotiating Restrictions

When proposed restrictions raise concerns, APPA staff will work with donors to:

- Clarify donor intent and explore whether alternative restrictions could achieve the donor's goals
- Explain organizational constraints and suggest modifications that better serve both parties
- Identify unrestricted or more broadly restricted giving opportunities that align with donor interests

Restricted Fund Minimums

To ensure efficient administration, APPA may establish minimum gift amounts for creating new restricted funds. Current minimums (if any) are determined by the Board of Directors.

Endowment Gifts

APPA does not currently maintain an endowment. Should the Board authorize creation of an endowment in the future, specific policies governing endowment establishment, investment, and spending will be developed.

Variance Power

APPA reserves the right to modify restrictions on gifts when:

- Restrictions become obsolete, impractical, or impossible to fulfill
- Changed circumstances make the original purpose unnecessary, impractical, or wasteful
- Modification would better serve the donor's charitable intent and APPA's mission

Any modification of restrictions will be undertaken in consultation with legal counsel and in accordance with applicable law and donor agreements.

Gift Agreements

For gifts with complex terms or significant restrictions, APPA may require a written gift agreement signed by the donor and APPA specifying:

- Description of the gift and its value
- Specific terms and restrictions
- Rights and responsibilities of both parties
- Acknowledgment that APPA retains ultimate control over use of the gift consistent with its tax-exempt purposes

VIII. GIFT VALUATION AND ACKNOWLEDGMENT

APPA provides timely acknowledgment of all gifts in compliance with IRS requirements and donor expectations.

Gift Valuation

Cash Gifts: Valued at the amount received.

Securities: Valued at the average of the high and low trading prices on the date of transfer (the date securities are received in APPA's account).

Donor Responsibility for Valuation: APPA does not provide valuations for tax deduction purposes. Donors are responsible for determining the fair market value of their contributions and obtaining qualified appraisals when required by IRS regulations.

IRS Requirements for Non-Cash Gifts: For non-cash gifts valued at more than $5,000, donors must:

- Obtain a qualified appraisal from an independent appraiser
- Complete IRS Form 8283 (Noncash Charitable Contributions)
- Submit Form 8283 Section B to APPA for signature

APPA will sign Form 8283 to acknowledge receipt of the gift but does not validate the donor's valuation or the appraiser's work.

Acknowledgment Requirements

APPA provides written acknowledgment for all gifts in accordance with IRS substantiation requirements.

Gifts Under $250: Donors receive acknowledgment that includes:

- APPA's name
- Date of contribution
- Amount of cash or description of property contributed

Gifts of $250 or More: Donors receive a contemporaneous written acknowledgment that includes:

- APPA's name
- Date of contribution
- Amount of cash or description of property contributed
- Statement of whether any goods or services were provided in exchange for the contribution
- Description and good faith estimate of the value of any goods or services provided

Timing: Acknowledgments are provided promptly, and in all cases by January 31 for contributions made during the prior calendar year.

Quid Pro Quo Contributions

For any payment exceeding $75 where the donor receives goods or services in return (such as event tickets, meals, or merchandise), APPA will provide a disclosure statement informing the donor:

- That the deductible amount is limited to the excess of the payment over the fair market value of goods or services received
- A good faith estimate of the fair market value of the goods or services provided

This disclosure must be provided at the time of solicitation or at the time of receipt of the contribution.

No Goods or Services Provided: When no goods or services are provided in exchange for a contribution, acknowledgment letters will include the statement: "No goods or services were provided in exchange for this contribution."

Recognition and Stewardship

Beyond legal requirements, APPA is committed to appropriate donor recognition and stewardship:

- Donors may be publicly recognized unless they request anonymity
- Recognition practices are governed by donor preferences and APPA's recognition policies
- APPA provides updates on how gifts are used and the impact they create
- Donors may opt out of public recognition at any time

Anonymous Gifts

APPA will honor requests for anonymity. Anonymous donors will still receive required tax acknowledgments but will not be publicly recognized without their consent.

IX. REPORTING AND ADMINISTRATION

APPA maintains systems and procedures to ensure proper administration of gifts and compliance with legal and regulatory requirements.

Recording and Accounting

All gifts are recorded in APPA's accounting system in accordance with generally accepted accounting principles (GAAP) applicable to nonprofit organizations.

Gift Classification: Gifts are classified as:

- Unrestricted contributions (available for general operations)
- Temporarily restricted contributions (donor-imposed restrictions that expire over time or upon completion of specified purpose)
- Permanently restricted contributions (endowment gifts where principal must be maintained in perpetuity)

Revenue Recognition: Gifts are recognized as revenue in accordance with applicable accounting standards:

- Cash gifts are recognized when received
- Securities are recognized when transferred into APPA's account
- Pledges are recognized when an unconditional promise to give is received
- Conditional gifts are recognized when conditions are substantially met

IRS Reporting

Form 990 Reporting: All contributions are reported on APPA's annual Form 990 (Return of Organization Exempt From Federal Income Tax) in accordance with IRS requirements.

Form 8283 - Noncash Charitable Contributions: For noncash gifts valued at more than $5,000, APPA will complete and sign Form 8283 Section B as required by IRS regulations.

Form 8282 - Donee Information Return: If APPA sells, exchanges, or otherwise disposes of donated property within three years of receipt, APPA will file Form 8282 with the IRS and provide a copy to the donor as required.

Board Reporting

The CEO will provide reports to the Board of Directors regarding gift activity:

- Summary of gifts received during the reporting period
- Gifts requiring Board approval or awareness
- Any unusual or complex gift situations
- Gifts declined and reasons for declination
- Trends in fundraising and gift revenue

The level of detail and frequency of reporting will be determined based on Board preferences and organizational needs.

Confidentiality

APPA respects donor privacy and maintains confidentiality of donor information in accordance with applicable law and professional standards. Donor information will not be sold, traded, or shared with third parties except:

- As required by law
- As necessary to process gifts (e.g., with financial institutions)
- With service providers under appropriate confidentiality agreements
- With the donor's express written consent

Donors may request that their names and contact information not be shared or publicly disclosed.

Gift Processing Procedures

APPA maintains internal procedures for:

- Receipt and deposit of gifts
- Acknowledgment letter generation and distribution
- Recording gifts in accounting systems
- Securities transfer coordination and sale
- IRS form completion and filing
- Gift agreement preparation and execution
- File maintenance and record retention

These procedures are documented and updated as needed to ensure efficient and compliant gift administration.

X. POLICY ADMINISTRATION

Authority

The Board of Directors establishes and maintains this Gift Acceptance Policy. The CEO has authority to interpret and administer this policy in day-to-day operations.

The CEO may confer with the Board or Executive Committee when guidance is needed on interpretation or application of policy provisions.

Amendments

Minor and Administrative Changes: The CEO may make minor or administrative changes to this policy (such as updating contact information, clarifying language, or adjusting operational procedures) without Board approval, provided such changes do not materially alter acceptance criteria, authority levels, or restrictions policies.

Substantive Changes: Substantive changes to gift acceptance criteria, authority thresholds, restrictions policies, or donor rights and obligations require approval by the Board of Directors.

All amendments shall be communicated to the Board and relevant staff in a timely manner.

Policy Review

This policy shall be reviewed as needed, with a comprehensive review conducted at least every three years to ensure alignment with:

- APPA's strategic priorities and programmatic needs
- Current legal and regulatory requirements
- IRS regulations and nonprofit best practices
- Changes in APPA's organizational structure or capacity

Effective Date

This Gift Acceptance Policy was adopted by the APPA Board of Directors on March 17, 2026 and supersedes all previous gift acceptance policies.

Questions

Questions regarding this policy should be directed to:

- Chief Executive Officer
- Email: [contact information]
- Phone: (703) 684-1446

END OF POLICY

Approved by:

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Board Chair

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March 17, 2026

Last Reviewed: March 17, 2026

Next Review Due: March 2029