



CHOATE
ROSEMARY HALL

Gift Policy

Approved by the
Development, Alumni, and Parent Relations Committee
of the Board of Trustees

April 22, 2021

STATEMENT OF GIFT POLICY

OVERVIEW

The mission of Choate Rosemary Hall – to provide a rigorous academic curriculum and an emphasis on the formation of character in a residential setting that allows teachers and students to live with, and learn from, each other in important ways – would not have been advanced over the years and would not be possible today without the generosity and foresight of the School’s alumni and friends and their philanthropic gifts to the School.

This Statement outlines the manner in which philanthropic gifts are considered, accepted, and administered by Choate Rosemary Hall (the School) and applies to all gifts to the School. It is intended to be a high-level governance policy that, together with a set of guiding principles, ensures that all gifts to or for the use of the School are structured to further the School’s mission while also ensuring fidelity to donor intent. This Statement of Gift Policy complements the School’s Statement of Character and the School’s Statement of Expectations.

Several overarching principles guide the School’s efforts to solicit and accept gifts, to agree to gift terms, to recognize donors, and to manage funds. They include:

ADHERING TO INSTITUTIONAL VALUES

The School is committed to respecting the rights, differences, and dignity of individuals; to demonstrating honesty and fair play in all dealings; and to pursuing excellence at all times in all aspects of its work. The School will not accept a gift which may damage or compromise the School’s reputation, which is not in the best interests of the School community, or which is not consistent with the School’s core values. The School will not knowingly encourage any gifts from donors whose disclosed personal or financial background depart significantly from these values.

ENSURING ALIGNMENT AND AUTONOMY

The School seeks and depends upon philanthropic gifts that align with the priorities and needs of the institution, that honor the intentions of donors as expressed in the terms of such gifts, and that allow control and flexibility regarding the use and administration of gift funds. No gift will be accepted that imposes an unreasonable or undue financial, legal or administrative burden on the School or on its faculty, staff, students or other resources.

UPHOLDING ACADEMIC FREEDOM

The School maintains a fundamental and enduring commitment to academic freedom and the rigorous pursuit of knowledge across many different fields of inquiry and from many different points of view. No gift will be accepted which violates the School’s integrity or commitment to academic freedom.

These principles inform the School's approach to the solicitation and acceptance of gifts and facilitate consistent gift administration in support of the School's mission. The School is mindful that, under IRS regulations, a philanthropic gift must be characterized as the complete transfer of assets from the donor to the School without the donor receiving a material benefit in return. At the same time the donor irrevocably transfers ownership and control over the funds to the School. From time to time the School will establish policies and procedures designed to ensure that the School will act in a manner that is consistent with the principles outlined herein and to ensure that the School will act in compliance with IRS and other government laws and regulations.

GIFT POLICY COMMITTEE

As fiduciaries of the School, the School's Board of Trustees has ultimate authority over the acceptance of gifts that it delegates to the Head of School. The Gift Policy Committee is appointed annually by the Head of School in consultation with the Chair of the Board of Trustees. It is charged with the general oversight of the School's policies related to the solicitation, acceptance, and administration of charitable gifts, including this Statement of Gift Policy, which the Gift Policy Committee may propose to amend from time to time. This Committee is led by the Chair of the Development, Alumni and Parent Relations Committee of the Board of Trustees and will include at least three additional members of the Board of Trustees, the Head of School, the Chief Development Officer, the Chief Financial Officer, and other senior School administrators and faculty members as appointed. The Gift Policy Committee is responsible for reviewing unusual or complex issues pertaining to certain gifts, for considering the application of gift policies to particular cases brought to the Gift Policy Committee, including exception requests, and for performing other functions as requested by the Board of Trustees. In addition, the Gift Policy Committee will review gifts included in a Consent Form – submitted prior to each Development Committee Meeting and detailing recent cash gifts of \$100,000 and up and pledges of \$250,000 and up – to ensure adherence with the principles of this Statement of Gift Policy.

SOLICITATION OF GIFTS

School development staff, faculty, and administrators are responsible for knowing and adhering to restrictions on gift acceptances and volunteer engagement that relate to perceived conflicts and other considerations. These restrictions include policies pertaining to the solicitation of gifts from donors while they have a family member applying for admission; gifts that might be construed as advancing a donor's business interests rather than the interests of the School, and; gifts that would pose substantial risks to the School because of the source or the purpose of the funds. The School, acting on recommendations from the Gift Policy Committee, has the right to refuse any gift from any donor and the right to rescind its acceptance of a gift that is determined to be inconsistent with the principles outlined in this Statement of Gift Policy.

ACCEPTANCE OF GIFTS

Gifts are accepted when they are found to advance the mission of the School and are made in accordance with the following principles:

- A gift will not be accepted if the funds or property donated have been acquired by other than legal means, or for which clear title to the donated asset will not flow directly from the donor to the School.
- A gift will not be accepted if the gift is too restrictive in purpose, requires expenditures beyond the School's resources, or compromises the academic freedom of the School community.
- A gift will not be accepted if the intended purpose of the gift and/or being associated with the donor of the gift could, in the judgment of the Gift Policy Committee and the Board of Trustees, inflict damage on the School's reputation, standing, or integrity or is contrary to School values.
- At the request of a donor the School may treat a gift as anonymous. However, a gift will not be treated as anonymous if the purpose of anonymity is to shield the School from damage to its reputation or to disguise a gift which otherwise would not be accepted.
- The acceptance of a gift does not imply nor mean that the School endorses or approves of the donor's views, opinions, businesses, or activities.
- The School is committed to transparency and will share information about the receipt of gifts in a manner that best serves the interests of the School and respects the wishes of donors.
- The School is authorized to repurpose a gift or its resulting fund, working in consultation with the donor or related parties if possible, if the designated purpose of the gift or fund is no longer feasible or appropriate or if the full gift amount pledged is not received.

RECOGNITION OF DONORS

The School may acknowledge gifts and/or honor an individual through the naming of a fund, physical space, collection, faculty position, or scholarship, among other approved School purposes. Naming is one of the ways in which the School acknowledges the generosity of donors and honors those whose service to or affiliation with the School has had considerable impact. Certain types of naming recognition may not be permitted, and some names may not be used, including those of corporations, governments, sitting heads of

state, and current School staff or faculty members. Naming of physical spaces may be bound by a determined time limit and in all cases will extend only for the useful life of the space.

In considering proposals to name a building, space, program or position, all parties acting on behalf of the School shall exercise judgment with regard to the individual or entity the proposal is intended to honor. In general, the Gift Policy Committee and the Board of Trustees, or those to whom authority to approve naming proposals is delegated, will not approve proposals for naming where, in their judgment, doing so: does not align with the School's mission and values; compromises academic freedom; and/or associates the School with a name that could inflict damage on the School's reputation.

The School reserves the right, on reasonable grounds and with due process as outlined herein, to revoke and terminate its obligations regarding a naming if, including, but not limited to:

- The School determines its association with the donor or the honoree could cause damage to the School's reputation, standing or integrity or is contrary to School values. This determination will be guided by the School's mission and values.
- In the case of a naming associated with a gift, the donor fails to fulfill the terms of the gift that is recognized by the naming.

The appropriate School representatives will make all reasonable efforts to inform in advance the original donors or honorees when the naming period is deemed concluded. The School may provide alternate recognition as appropriate in honor of the original gift.

MANAGEMENT OF FUNDS

As with all School funds, donated funds are invested pursuant to the policies of the School. Any endowed fund is invested collectively under the direction of the Investment Committee of the Board of Trustees in a manner that seeks to support current programmatic needs while preserving the endowment's purchasing power for future generations. The School will not accept gifts that would limit the School's discretion to manage and invest School funds.

All programmatic activities supported by endowed funds have associated overhead costs, including costs for information technology, facilities operations and maintenance, student services, academic planning, and human resources. The School assesses donor funds for such costs, applying a portion of the amount made available for annual spending from a donor fund to defray such direct and indirect facilities and administrative costs.

Annually, following the issuance of the School's audited financials, the School will issue an Endowment Report which includes an endowment overview and a fund financial update.

Generosity has made Choate Rosemary Hall what it is today. By ensuring that every gift is used wisely, effectively, and fairly, the School honors the aspirations and hopes of those who sought—and seek—to preserve its excellence and to advance its mission in perpetuity.