



Palisades Charter High School
Schoolwide Fundraising Policies & Procedures

A. Purpose

The purpose of this policy is to establish policy and procedures governing the initiation, authorization, and review of all fundraising activities of Palisades Charter High School (PCHS). This policy is intended to create practices that adequately safeguard public funds, provide for accountability, and ensure compliance with state and federal laws.

PCHS encourages community and business partnerships that enhance and supplement the public education system. PCHS also desires to protect students, parents, teachers, and school administrators from over-commercialization and fundraising efforts that are coercive and disruptive to the education processes, threatening to the health and welfare of students, or lacking in educational merit.

B. Scope

This policy applies to all PCHS administrators, licensed educators, staff members, students, organizations, sports teams, volunteers and individuals who initiate, authorize, or participate in fundraising events or activities for school-sponsored events. It is expected that in all dealings, PCHS and school employees will act ethically and consistent with PCHS' mission and strategic goals.

While the relationship is one of trust and support, PCHS-related independent non-profit 501(c) (3) such as booster organizations and parent-teacher organizations are not PCHS sponsored organizations, these organizations must meet the terms and conditions of this policy to use the PCHS name, mascot, logo, PCHS facilities or to represent any affiliation with PCHS.

C. General Policy Statement for School-sponsored Activities

1. "Public funds" are money, funds, and accounts, regardless of the source from which the funds are derived, that are owned, held, or administered by the state and any of its political subdivisions.
2. Fundraising is permitted within PCHS to raise additional funds to supplement school-sponsored academic and co-curricular programs.
3. "School-sponsored" means activities, fundraising events, clubs, camps, clinics, programs, sports, etc., or events, or activities that are authorized by PCHS that support PCHS or

authorized curricular school clubs, activities, sports, classes or programs that also satisfy one or more of the following criteria.

The activity:

- a. Is managed or supervised by a PCHS employee.
- b. Uses PCHS facilities, equipment, or other school resources.
- c. Is supported or subsidized by public funds, including school's activity funds or minimum school program dollars.
4. PCHS recognizes that fundraising efforts, donations, and public supports varies. PCHS is committed to appropriate distribution of unrestricted funds and the management of fundraising to ensure that the educational opportunities of all students are equal and fair.
5. PCHS is committed to the principles of gender equity and compliance with Title IX guidance. PCHS commits to use all facilities, unrestricted gifts and other available funds in harmony with these principles. PCHS reserves the right to decline or restrict donations, gifts, and fundraising proceeds, including those that might result in gender inequity or a violation of Title IX.
6. The Executive Director/Principal, consistent with PCHS policy, shall have the responsibility to review and approve all fundraising activities in advance of scheduled events or activities.
7. Annually, each PCHS department or program will review all planned camps, clinics, activities, and fundraisers to determine those as school-sponsored. Those not designated as school-sponsored will follow the non-school-sponsored criteria in Section E.
8. All monies raised through fundraisers from school-sponsored activities are considered public funds. PCHS is ultimately responsible for the expenditure and allocation of all monies collected and expended through student, school-organized fundraising.
9. The collection of money associated with fundraisers for school-sponsored activities will comply with PCHS cash receipting policies.
10. The expenditure of any public funds associated with fundraisers for school-sponsored activities will comply with PCHS cash disbursement policies.
11. Properly approved school-sponsored activities may:
 - a. Use the school's name, facilities and equipment.
 - b. Utilize PCHS employees and other resources to supervise, promote, and otherwise staff the activity or fundraiser.
 - c. Be insured under PCHS' risk management policy.
12. Authorization and supervision of fundraising for school-sponsored activities:
 - a. Fundraising at PCHS shall be approved in writing, prior to the activity by the Executive Director/Principal and supervised by PCHS employees.
 - b. Donations from individuals or organizations will follow PCHS' gift and donation policy.
 - c. The sale of banners, advertising, signs, or other promotional materials that will be displayed on school property must be approved by the Executive Director/Principal before the items are initiated or printed, and must meet

community standards. Partisan or political advertising and advertising for products that are prohibited by law or use by minors, such as alcohol, tobacco, or other substances that are known to endanger the health and well-being of students, are prohibited.

- d. All fundraising projects for construction, maintenance, facilities renovation or improvement and other capital equipment purchases must be approved in writing by the Executive Director/Principal, Chief Business Officer and the PCHS Board of Trustees.

D. General Fundraising Standards for School-sponsored Activities

1. PCHS reserves the right to prohibit, restrict or limit any fundraising activities associated with the school.
2. Faculty and student participation in fundraisers is voluntary.
3. Participation in fundraising shall not affect a student's grade. Students shall not be required to participate in fundraising activities as a condition of belonging to a team, club or group, nor shall a student's fundraising effort affect his/her participation time or standing on any team, club or group.
4. Competitive enticements for participation in fundraisers are discouraged. If prizes or rewards are offered by a selected fundraising vendor, they should only be awarded to groups, classes or students, and must be disclosed and approved prior to the fundraiser. Rewards, prizes, commissions, or other direct or indirect compensation shall not be received by any teacher, activity, club or group director, or any other PCHS employee or volunteer.
5. Door-to-door sales or solicitations are prohibited.
6. Approval may be denied for fundraising activities that would expose PCHS to risk of financial loss or liability if the activity is not successful.
7. Fundraising activities shall be age appropriate, and shall maintain the highest standards of ethical responsibility and integrity.
8. Fundraising revenues should be accounted for at an individual contribution level or participation level. Participation logs should be retained and turned into the business office to be included with the deposit detail.
9. Fundraising for unrelated third-party organizations is prohibited.
10. PCHS employees may not set up bank accounts for activities or fundraisers associated with PCHS.
11. PCHS employees may not create any Go Fund Me campaigns in the name of PCHS without prior approval of the Executive Director/Principal.
12. **PCHS-sponsored organizations** shall not make any direct purchases or payments, including, but not limited to, purchasing uniforms and payment of fees associated with any student activity without obtaining the Executive Director/Principal's approval of such purchase. Representatives from PCHS-related organizations should meet and confer with the Executive Director/Principal prior to the end of the school year to determine if such approval for purchases and fundraising are authorized.

13. PCHS-related organizations cannot hire employees or independent contractors employed by PCHS without prior written approval from the Executive Director/Principal and without adhering to required background checks.
14. All fundraising organizations shall not solicit funds directly from prospective student participants and/or their families until a roster or the equivalent has been established for said activity.
15. All PCHS fundraising entities are prohibited from requiring students or families to pay to participate in any school activities. Pursuant to Education Code Section 49010 and 49011 supplies, materials, activity fees and equipment must be provided to students free of charge.

E. Non-school sponsored Activities & Fundraisers

1. Activities, clubs, groups and their associated fundraisers or other activities that are not school-sponsored or groups, clubs, sports, and programs that are not managed by PCHS employees are deemed to be non-school-sponsored. Non-school-sponsored activities may:
 - a. NOT use the school's name without express PCHS permission.
 - b. NOT use PCHS' facilities, equipment, and other assets or staff unapproved by the Executive Director/Principal in advance.
 - c. NOT co-mingle public funds and private fundraising proceeds or expenditures.
 - d. NOT use school records to contact parents or students.
2. Funds, donations, or gifts generated through non-school-sponsored activities or events may be donated to PCHS to support specific programs, teams, groups, clubs, etc. All donations or gifts shall follow guidance established in the PCHS donations and gifts policy.

F. Conditions for Non-Profit 501(c) (3) Corporations Representing PCHS

- 1) Palisades Charter High School currently recognizes the following booster groups ("Non-Profits") whose sole fundraising efforts are to benefit PCHS students and school related activities: Palisades High School Booster Club, Pacific Palisades Lacrosse Association, Pali Quarterback Club and the Pacific Palisades Baseball Association and whose actions are governed under this section.
- 2) Each Non-Profit entity, current or new, will provide the Executive Director/Principal copies of the following:
 - a.) Letter from Dept. of Treasury verifying tax exempt status by August 15, 2017.
 - b.) Articles of Incorporation by August 15, 2017.
 - c.) Current Bylaws by August 15, 2017, and any amendments thereto within a month of Adoption.
 - d.) Evidence of Liability insurance by August 15 of each year.
 - e.) Annual Registration with Attorney General (RRF-1) by approximately November 15 of each year.
 - f.) Current Statement of Information (S1-100) by August 15, 2017 and biennially thereafter by approximately November 15th.

- g.) Copies of the most recent Federal and State tax returns by approximately November 15 of each year.
- 3) By no later than August 15, 2017, and annually thereafter if the documents are **updated** or **revised**, all non-profit 501(C) (3) corporations will provide to the Executive Director/Principal the following documents:
 - a.) Letter from Dept. of Treasury verifying tax exempt status.
 - b.) Articles of Incorporation.
 - c.) Current Bylaws.
- 4) Accounting.
 - a.) Non-Profits must conduct an annual accounting with a compilation of its receipts and disbursements (ie., financial statements, balance sheets, and profit & loss statements) performed in accordance with generally accepted accounting principles.
 - b.) All Non-Profits bylaws must specify a reasonable procedure for internal financial control that **may** be reviewed and approved by the PCHS's Chief Business Officer.
 - c.) Non-Profits are to provide a profit & loss statement to the Executive Director/Principal by October 1 of each calendar year
- 5) PCHS Website
 - a.) A PCHS-related organization may operate a website that is accessed through the PCHS website if the following conditions are met:
 - i.) Written permission from the Executive Director/Principal, **or the Executive Director/Principal's designated representative** is granted for the PCHS-related organization to create a link to the organization's website.
 - ii.) The content of the website is approved by the Executive Director/Principal.
 - iii.) Sites, pages and/or other material that have not been actively maintained for six (6) months may be removed without notice.
 - iv.) Information published will not contain advertising, sponsored links, or the endorsement of any products or services without the written approval of the Executive Director/Principal.
 - v.) No names, images, work or other information about specific students shall be published on the Internet without the written consent of the parent or legal Guardian.
 - vi.) If any photograph, video, or other published image contains individually identifiable students, permission to use the image must be on file from all students in the image.
 - vii.) Each PCHS-related organization shall maintain a file of permission forms. It is the responsibility of the person publishing the content to verify written parent or legal guardian consent before using any student name, image, work or other information on the Internet.
 - viii.) Web pages may not be used to promote political positions, personal agendas, non-PCHS related activities, or other uses that jeopardizes the PCHS's tax-exempt status or be deemed inappropriate by the Board of Trustees.
 - ix.) Sites may not contain links to any questionable material or anything that can be

deemed to be in violation of any PCHS policy or any applicable law.

- x.) The PCHS name, mascot and/or logo may not be used without the written permission of the Executive Director/Principal.
- 6) Prohibited Activities:
- a.) PCHS-related organizations should not make any direct purchases or payments, including, but not limited to, purchasing uniforms and payment of fees associated with any student activity without obtaining the Executive Director/Principal's approval of such purchase. Representatives from the PCHS-related organization should meet and confer with the Executive Director/Principal prior to the end of each school year to determine if such approval for purchases and fundraising objectives are authorized.
 - b.) PCHS-related organizations cannot hire employees or independent contractors employed at PCHS without prior written approval from the Executive Director/Principal and without adhering to required background checks.
 - c.) All PCHS-related organizations are prohibited from requiring a student or families to pay to participate in any school activities. Pursuant to Education Code Section 49010 and 49011 supplied, materials, activities fees and equipment must be provided to students free of charge.
 - d.) All PCHS-related organization shall not represent or imply that activities, contracts, purchases or financial commitments are made on behalf of or are legally binding upon PCHS.
 - e.) PCHS may terminate its relationship with a 501 (c)(3) found to be in violation of this Policy. In which case, the 501(c)(3) will be prohibited from soliciting any donations or other fundraising activity under the name of PCHS.

G. Capital Fundraising/Large Fundraising Projects

1. All fundraising projects for construction, maintenance, facilities renovation or improvement, and other capital equipment purchases must be approved by the Executive Director/Principal, the Chief Business Officer and the Board of Trustees. Prior to the initiation of a large capital drive or specific fundraising drive, the following will be provided to the Chief Business Officer for evaluation and recommendation to the Executive Director/Principal:
 - a. Prospective construction, maintenance or renovation plans and estimated costs.
 - b. Proposed naming opportunities.
 - c. Proposed fundraising timeline.
 - d. Loans or financing agreements.
 - e. Maintenance or upkeep requirements and costs.
 - f. Assurances of compliance with Title IX and any ADA restrictions.
 - g. The Executive Director/Principal will make a recommendation to the Board of Trustees. The Board reserves the right to tentatively approve plans, pending fundraising, donations, equity or other conditions

H. Gift and Donation Acceptance Policy

Acceptance of any contribution, gift or grant is at the discretion of Palisades Charter High School. PCHS will not accept any gift unless it can be used or expended consistently with the purpose and mission of PCHS.

No irrevocable gift, whether outright or life-income in nature, will be accepted if under any reasonable set of circumstances the gift would jeopardize the donor's financial security.

PCHS will refrain from providing advice about the tax or other treatment of gifts and will encourage donors to seek guidance from their own professional advisors to assist them in the process of making their donation.

PCHS will accept donations of cash or publicly traded securities. Gifts of in-kind services will be accepted at the discretion of PCHS.

Certain other gifts, real property, personal property, in-kind gifts, non-liquid securities, and contributions whose sources are not transparent or whose use is restricted in some manner, must be reviewed prior to acceptance due to special obligations raised or liabilities that may pose for PCHS.

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

PCHS 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, PCHS will restrict information about the donor to only those staff members with a need to know.