

**St. Columba's Episcopal Church
Washington, DC
Endowment Fund Policy and Related Policies**

January 27, 2020
Date of Adoption

St. Columba's Episcopal Church

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ENABLING RESOLUTION AND POLICY

ESTABLISHING AN ENDOWMENT FUND

FOR

ST. COLUMBA'S EPISCOPAL CHURCH

WASHINGTON, DC

1 WHEREAS, Christian stewardship involves the faithful management of all of God's gifts – time,
2 talent, the created world, and money, including accumulated, inherited, and appreciated assets.

3 WHEREAS, Christians can give to the work of the Episcopal Church through a variety of gift
4 vehicles in addition to cash, including bequests in wills, life income gifts, annuities, trusts, life
5 insurance policies, real estate, securities, and other assets.

6 WHEREAS, it is the desire of this Parish to encourage, receive, and administer these gifts in a
7 manner faithful to the loyalty and devotion to God expressed by the donors and in accord with
8 the canons of the Episcopal Church and the Diocese of Washington and the policies of this
9 Parish.

10 THEREFORE, BE IT RESOLVED that this Parish, through action of its Vestry, establish a new
11 and separate fund to be known as "The Endowment Fund" of St. Columba's Episcopal Church,
12 4201 Albemarle St., NW, Washington, DC 20016, USA

13 The Endowment Fund includes the following sub-funds:

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15 Permanent Endowment Fund – Gifts received from donors which, under the terms of the
16 gift, are not wholly expendable by the Church on a current basis (by words such as "to be
17 held in perpetuity" or "spend income only") shall be allocated to the Permanent
18 Endowment Fund. Gifts to this fund shall be used for the purposes described below. The
19 corpus is protected by law under the District of Columbia Uniform Prudent Management
20 of Institutional Funds Act (UPMIFA) and gifts will be held in perpetuity subject only to
21 such exceptions as are consistent with this resolution and applicable law.

22 General Endowment Fund (quasi) – Gifts to this fund will be managed as if they were
23 permanent endowment funds but the corpus shall not be subject to UPMIFA. The Vestry
24 may authorize distributions in accordance with this policy. This fund will be used for
25 such purposes as determined by the Vestry.

26 It is understood that the Vestry may set aside other monies for investment (collectively
27 the "Investment Fund") to be used at their discretion and managed in accordance with the
28 Investment Policy.

[The following description pertains to the Endowment Funds.]

29 BE IT FURTHER RESOLVED that the purpose of the Permanent Endowment Fund and the
30 General Endowment Fund (quasi) (collectively the “Endowment Fund”) is to enable the Parish to
31 fulfill its mission more completely beyond what is possible through its annual operating funds,
32 and that distributions from the Endowment Fund shall be used for such capital improvements or
33 such other projects as the Vestry shall determine from time to time (it being understood that gifts
34 that have been accepted for a purpose specified by the donor in accordance with the Gift
35 Acceptance Policy shall be used only for that purpose unless modified in accordance with such
36 policy).

PLAN OF OPERATION

1. Oversight

37 The FINANCE COMMITTEE shall have oversight responsibility for the Endowment Fund
38 unless the Vestry chooses to create by resolution a separate Endowment Committee (in either
39 case the “COMMITTEE”).

2. Roles of the COMMITTEE

40 The COMMITTEE will oversee the management of the invested funds and monitor the
41 distributions from the Endowment Fund in compliance with the Spending Policy (*Section B, as*
42 *revised from time to time*) and in accordance with the purposes and distribution policies set out in
43 this Resolution.

44
45 The COMMITTEE will also oversee the development of a comprehensive planned giving program
46 headed up by the Director of Stewardship to encourage persons, trusts, and estates to consider
47 making gifts, grants, bequests, or other legacy gifts to St. Columba’s Church.

3. Reports

48 The COMMITTEE shall report on the Endowment Fund to the Vestry on a semiannual basis.

49 The Vestry or the Treasurer shall report to the congregation on the Endowment FUND at each
50 annual meeting of the Parish.

4. Professional Counsel and Other Expenses

51 The COMMITTEE, at the expense of the FUND, may provide for such auditing and for
52 professional counseling on investments or legal matters as it deems to be in the best interests of
53 the FUND. Committee members shall serve without compensation, but reasonable expenses
54 related to the execution of their duties may be paid from the funds available for expenditure prior
55 to distribution with Vestry approval.
56

5. Investments

57 All funds will be invested in accordance with the investment guidelines established in the
58 Investment Policy.

6. Funds for Specific Purposes

59 At the discretion of the Vestry, the COMMITTEE may establish additional sub-funds within the
60 Endowment Fund for specific purposes.

7. Liability of Members of the COMMITTEE

61 Each member of the COMMITTEE shall act in good faith regarding the investment of the
62 assets. Each member shall be liable only for his/her own conduct and shall not be liable for the
63 acts or omissions of any other members. No member shall engage in self-dealing or transactions
64 with the Endowment Fund in which the member has direct or indirect financial interest and shall
65 at all times refrain from any conduct in which his/her personal interests would conflict with the
66 interests of the Endowment Fund.

8. Holding of Assets, Action to Sell

67 All endowment assets are to be held in the name of The Endowment Fund of St. Columba's
68 Episcopal Church. Actions to hold, sell, exchange, rent, lease, transfer, convert, invest, reinvest,
69 and in all other respects, to manage and control the assets of the Endowment Fund, including
70 stocks, bonds, mortgages, notes, and warrants of other securities, are to be made by a designated
71 member of the COMMITTEE or by the Director of Finance and Administration on behalf of the
72 COMMITTEE.

9. Acceptance of Gifts to the Endowment Fund

73 The COMMITTEE shall accept gifts to the Endowment Fund in accordance with the Gift
74 Acceptance Policy (Section D). Any donor-restricted gifts must meet the requirements of the Gift
75 Acceptance Policy.

10.. Distributions from the Endowment Fund

76 It is the *intent* of this Resolution that all funds within the Endowment Fund shall be managed in
77 perpetuity as if they were *true* endowments, subject only to such exceptions allowed by law and
78 approved by the Committee. Distributions from the Endowment Fund shall be made in
79 accordance with the Spending Policy, using a "total return" principle. Notwithstanding the
80 foregoing, it is understood that the General Endowment Fund (quasi) is not subject to the
81 restrictions on distributions under UPMIFA. No portion of the Permanent Endowment Fund
82 shall be "borrowed" including any "temporary usage" for other needs of the Parish.

11. Amendment of this Resolution

83 Any amendment to this Resolution shall be adopted by a vote of at least a majority of the
84 membership of the Vestry.

12. Disposition or transfer of the Endowment Fund

85 In the event the Parish ceases to exist, whether through merger, dissolution, or some other event,
86 disposition or transfer of the Endowment Fund shall be at the discretion of the Vestry in
87 conformity with the approved congregational constitution and in accord with diocesan canons
88 and the Bishop of the Diocese of Washington, DC, USA. It may be appropriate to consult with
89 the Episcopal Church Foundation to determine the manner in which Endowment Fund
90 obligations will be met after the Parish ceases to exist.

91 The foregoing resolution is hereby adopted by the Vestry this 27 day of January, 2020.

92 St. Columba's Episcopal Church
93 Washington, DC

94 Stephen Smith (print name)

95 [Signature] (signature)
96 Senior Warden

Attest: Karen B Sprague

[Signature]
Clerk

**ENDOWMENT FUND
RELATED POLICIES
FOR
ST. COLUMBA’S EPISCOPAL CHURCH**

**SECTION A
*Investment Policy***

Purpose

97 This Investment Policy establishes the philosophy, guidelines and investment objectives for
98 managing the investments of the Endowment Fund and the Investment Fund of St. Columba’s
99 Episcopal Church as well as the invested and reserved funds for the St. Columba’s Nursery
100 School (the Endowment fund and the Investment Fund are referred to herein as the Church
101 Funds; such Nursery School funds are herein referred to as the NS Funds, and the
102 Church Funds and NS Funds are referred to as the “FUNDS”).

Responsibility

103 The ultimate responsibility for managing the FUNDS resides with the Vestry. The Vestry directs
104 the Finance Committee together with the Director of Finance and Administration (“Director”) to
105 manage the Church Funds in accordance with these guidelines, as adopted and amended from
106 time to time. The Director shall have day-to-day responsibility, reporting to and subject to the
107 oversight of the Finance Committee.
108

109 The Vestry delegates authority to the Finance Committee to authorize the Board of Governors
110 (the “NS Board”) of St. Columba’s Nursery School (the “School”) to manage the NS Funds in
111 accordance with this policy, as adopted and amended from time to time, subject to the oversight
112 of the Finance Committee on behalf of the Vestry. The NS Board shall report to the Finance
113 Committee on a quarterly basis on the performance of the NS Funds. The NS Board shall work
114 with the Director with respect to the day-to-day management of the NS Funds.
115

116 The Finance Committee may choose to employ an outside investment manager for the Church
117 Funds. The NS Board may choose to employ an outside investment manager for the NS Funds,
118 provided that if such manager is different from the manager for the SCEC Funds, it shall consult
119 with the Finance Committee on such selection.
120

121 These guidelines shall be reviewed at least annually by the Finance Committee to determine
122 whether they should be amended or remain unchanged.
123

Objectives

124 The assets of the FUNDS are to be invested with the same care, skill and diligence that a prudent
125 investor would exercise in investing institutional endowment funds. The primary objective will
126 be to provide long-term growth of principal and income without undue exposure to risk.

INVESTMENT GUIDELINES

Time Horizon

127 The investment objectives and strategic asset allocation of the FUNDS are based on a long-term
128 time horizon, provided it is understood that such horizon may be short-term in the case of such
129 portions of the Investment Fund and the NS Funds as the Finance Committee and NS Board,
130 respectively, shall determine are needed for short-term use.

Risk Tolerance

131 Because of their long-term time horizon (subject to the foregoing paragraph), the FUNDS can
132 tolerate some interim fluctuation in market value and rates of return in order to achieve its
133 objectives. High level risk, high volatility and low-quality rated securities, however, are to be
134 avoided.

Prohibited Investments

135 Neither the Finance Committee nor the NS Board shall invest in securities of private companies,
136 restricted stock or other illiquid issues, securities whose issuers have filed for bankruptcy at the
137 time of investment, commodities, futures, arbitrage and other uncovered options, and shall not
138 engage in short sales, margin transactions or other similar specialized investment activities;
139 however, the use of funds that use these investment activities in a constructive manner are
140 permitted. Funds shall not be invested in the securities companies deriving more than 10% of
141 their annual revenues from the manufacture or distribution of tobacco, firearms or alcohol
142 products except as part of a diversified mutual fund. This paragraph shall not be deemed to
143 restrict the ability of the Finance Committee or the NS Board to accept gifts that meet the criteria
144 of the Gift Acceptance Policy.

Portfolio Diversification

145 The investment objectives should be achieved through a diversified portfolio, which may include
146 but is not limited to large-cap, mid-cap, small-cap U.S equities, international equities (both
147 developed and emerging markets), bonds and cash. Mutual funds, common trust funds, exchange
148 traded funds, and notes representing any of these asset classes may be used.

Investment Discretion

149 These guidelines are not intended to restrict or impede the efforts of the Finance Committee or
150 the NS Board to attain the objectives of the Church Funds or the NS Funds, respectively, nor are
151 they intended to exclude the Finance Committee or the NS Board from taking advantage of
152 appropriate opportunities as they arise. The Finance Committee and the NS Board shall have
153 discretion and flexibility to implement the objectives and policies herein set forth.

Asset Allocation

154 Because securities markets may vary greatly throughout a market cycle, the Finance Committee
155 and the NS Board may change the asset mix of the FUNDS under their authority within the
156 following ranges as long as that mix meets the overall objectives and is consistent with the policy
157 guidelines herein set forth. The FUNDS shall be allocated between equity investments and bonds
158 and/or other fixed income securities.
159

160 The strategic target allocation shall be within the following ranges:

161		<u>Low</u>	<u>Target</u>	<u>High</u>
162	EQUITIES:	50%	60%	70%
163	FIXED INCOME:	30%	40%	50%
164	CASH:	0%	0%	20%

165 The target allocation among equity classes shall be determined periodically (and at least
166 annually) by the COMMITTEE in consultation with the investment manager(s) to reflect a
167 prudent response to current market conditions.

168
169 Notwithstanding the foregoing, the Finance Committee, in the case of the Investment Fund, and
170 the NS Board, in the case of the NS Funds, may allocate such portions of such funds that each of
171 them has determined are needed for short-term use to a greater (up to 100%) portion of cash and
172 cash equivalents.

Investment Goals

173 While maintaining the asset mix within the above guidelines, the Finance Committee, in the case
174 of the Church Funds, and the NS Board in the case of the NS Funds, accepts a risk level for such
175 FUNDS' overall investment program that is intended to produce a total annual return adequate to
176 cover these components: expenditures from such FUND (as determined annually by the Finance
177 Committee under the Spending Policy or the NS Board), inflation, and fees.

Authority of the Director

178
179 The Director shall carry out the instructions of the Finance Committee and manage funds on a
180 day-to-day basis. The Director shall have the authority to sell investments and withdraw cash to
181 meet operating expenses of the Church as necessary, provided that any sales or withdrawals (in a
182 single transaction or series of transactions) in excess of \$50,000 but not more than \$100,000
183 shall require the approval of the Treasurer or the Rector, and in excess of \$100,000 shall require
184 the approval of the Finance Committee.

185
186 For the Nursery School, The Director and/or Head of School shall have the authority to sell
187 investments and withdraw cash to meet operating expenses of the School as necessary, provided
188 that any sales or withdrawals (in a single transaction or series of transactions) in excess of
189 \$50,000 but not more than \$100,000 shall require the approval of the Nursery School Treasurer
190 or the Rector, and in excess of \$100,000 shall require the approval of the Nursery School Board.

Reporting

191 The Finance Committee shall prepare a quarterly report to the Vestry with respect to the Church
192 Funds which will include the fund value, any changes in the asset allocation strategy, and the
193 investment performance. The report shall reflect compliance with the objectives, policies, and
194 guidelines set forth herein. The NS Board shall prepare a similar report with respect to the NS
195 Funds annually to the Finance Committee and Vestry.

SECTION B
Spending Policy

198 Money will be distributed from the Endowment Fund with the approval of the Finance
199 Committee for those uses which conform to the purposes and restrictions in the Endowment
200 Policy and as established by donors.

201 Funds available for distribution from the Endowment Fund will be determined by using a total
202 return principle, i.e., return derived from dividends and interest *as well as* realized and unrealized
203 capital gains. The funds available for distribution during any one year will be limited (subject to
204 the last paragraph hereof) to a percentage of the market value of the Endowment Fund that is
205 based on a three-year rolling average, with measures taken at the end of each of the preceding
206 three years. The market value for this purpose will be taken net of the fees for investment
207 management. The percentage of the Endowment Fund made available for distribution shall be
208 determined each year by the COMMITTEE and will normally fall in the range of 3% to 5%. In
209 so doing, market performance of the portfolio will be an important consideration. It will be the
210 goal of the COMMITTEE to grow, or at least maintain, the purchasing power of the Endowment
211 Fund taking into account the impact of inflation and fees.

212
213 Notwithstanding the foregoing, subject to the intent of a donor expressed in a gift instrument, (i)
214 the Vestry may authorize additional distributions from the Permanent Endowment Fund provided
215 it complies with all applicable requirements of law[and the same is approved by a two-thirds
216 vote of the Vestry] and (ii) the Vestry or the Committee may authorize additional distributions
217 from the General Endowment Fund (quasi) as it shall deem necessary and appropriate, provided
218 it complies with all applicable requirements of law.

219
Any unexpended funds from those available for distribution in a given year will be accrued and
will continue to be considered available for distribution in subsequent years unless otherwise
designated by action of the COMMITTEE. Expenses related to the management and
administration of the Endowment Fund will be deducted from the funds available for
distribution.

SECTION C
Donor-Restricted Fund Policy

220 A separate and designated sub-fund within the Endowment Fund (or the Investment Fund) may
221 be established for gifts in such minimum amounts as established by the Gift Acceptance Policy,
222 and which are restricted as to purpose and accepted in accordance with the Gift Acceptance
223 Policy.

224 If accepted, the assets are merged with other assets of the Endowment Fund (or the Investment
225 Fund as the case may be) for investment purposes, but the identity and designated purpose of
226 each fund is preserved individually.

227 The fund is established effective the last day of the quarter in which the gift is received. The
228 value is determined either by the actual value, if received by the Endowment Fund (or the
229 Investment Fund) in cash, or the market value of the assets determined on the date the fund is
230 established.

231 Income, realized gains or losses, and unrealized gains or losses are allocated quarterly to each
232 fund based on its market value relative to the total market value of the Endowment Fund (or the
233 Investment Fund) at the end of the previous quarter. New gifts are then added and withdrawals
234 are subtracted to arrive at the new value of the restricted fund on the last day of the quarter.
235 Expenditures are limited to the purposes specified in the restriction and, in the case of the
236 Endowment Fund, are governed by the Spending Policy.

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Section D Gift Acceptance Policy

St. Columba's Episcopal Church solicits and accepts gifts for purposes that will help the organization further and fulfill its mission. St. Columba's urges all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to their gifts, including the resulting tax and estate planning consequences. The gift acceptance policy will provide guidelines to representatives of the Parish 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 Parish.

Gift Review Committee:

Any questions which may arise in the review and acceptance of gifts to the Parish will be referred to the Endowment Fund Committee, or if there is no such Committee at the time, the Finance Committee (the "Committee").

Restrictions on Gifts: St. Columba's will not accept gifts that (a) would result in St. Columba's violating its corporate charter, (b) would result in St. Columba's losing its status a tax-exempt 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 St. Columba's, or (e) are for purposes outside of St. Columba's mission. Decision on the restrictive nature of a gift, and its acceptance or refusal, shall be made by the Committee.

Gifts Generally Accepted Without Review:

- **CASH:** Cash gifts are accepted in any form, including by check, money order, credit card or on-line. Checks and money orders shall be made payable to St. Columba's. In no event shall a check be made payable to an individual who represents St. Columba's in any capacity.
- **MARKETABLE SECURITIES:** Marketable securities may be transferred electronically to an account maintained at one or more brokerage firms or delivered physically with the transferor's endorsement or signed stock power (with appropriate signature guarantees) attached. All marketable securities will be sold promptly upon receipt unless the Finance Committee shall approve an exception. 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 Committee.
- **BEQUESTS AND BENEFICIARY DESIGNATION UNDER REVOCABLE TRUST, LIFE INSURANCE POLICIES, COMMERCIAL ANNUITIES AND RETIRMENT PLANS:** Donors are encouraged to make bequests to St. Columba's under their wills, and to name St. Columba's as beneficiary under trusts, life insurance policies, commercial annuities and retirement plans.
- **CHARITABLE REMAINDER TRUSTS:** St. Columba's will accept designation as a remainder beneficiary of charitable remainder trusts.
- **CHARITABLE LEAD TRUSTS:** St. Columba's will accept designation as an income beneficiary of charitable lead trusts.

Gifts Accepted Subject to Prior Review: Certain forms of gifts may be subject to review prior to acceptance. Example of gifts subject to prior review include, but are not limited to:

- **NON-PUBLICLY HELD SECURITIES:** Non-publicly held securities may be accepted after consultation with the Committee.

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- **TANGIBLE PERSONAL PROPERTY:** The Committee shall review and determine whether to accept any gifts 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? Gifts of jewelry, artwork, collections, equipment, and software shall be assessed for their value to St. Columba's. Their value may be realized either by being sold or in connection with St. Columba's exempt purpose. Depending upon the anticipated value of the gift, a qualified outside appraiser may be asked to determine its value. St. Columba's shall adhere to all IRS requirements relating to valuation and disposition of gifts of tangible property and will provide appropriate forms to the donor and IRS.
 - **LIFE INSURANCE:** St. Columba's will accept gifts of life insurance where St. Columba's is named as both beneficiary and irrevocable owner of 100% of the insurance policy. The donor must agree to pay, before due, any future premium payments owing on the policy. If the gift is a paid-up policy, the value for gift crediting and accounting purposes is the policy's replacement cost. If the policy is partially paid-up, the value for gift crediting and accounting purposes is the policy's cash surrender value. (For IRS purposes, the donor's charitable income tax deduction is equal to the interpolated terminal reserve, which is an amount slightly in excess of the cash surrender value)
 - **REAL ESTATE:** All gifts of real estate are subject to review by the Committee. Prior to accepting any gift of real estate other than a personal residence, the Committee shall determine whether an initial environmental review by a qualified environmental firm is prudent. In the event that the initial review reveals a potential problem, the Committee 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 purpose? Is the property readily marketable? Are there covenants, conditions, restrictions, reservations, easements, encumbrances or other limitations associated with the property? Are there 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?
 - **Acceptance of Restricted Gifts:** Only gifts of \$50,000 or more may be restricted to a specific purpose of the donor's choice, consistent with the work of the Church, unless the Vestry or its designee permits otherwise. Notwithstanding the foregoing, with the approval of the Finance Committee, a gift of less than \$50,000 may be accepted which is restricted to a purpose for which there are already donor-restricted funds. Although a gift with special designation is generally welcome, St. Columba's urges persons contemplating a gift to discuss their intent with the Development Office. This is particularly important when someone is considering a testamentary gift.

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It is essential that all gifts restricted to a particular purpose be thoroughly documented in writing. In the case of a gift to the Endowment Fund (e.g., a sum of money to be held in perpetuity with the income earned used to support either a particular program or for the general support of St. Columba's), the gift will be reported to the Vestry and the precise terms thereof noted in the minutes of the meeting.

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Gifts for Building and Spaces:

Gifts designated for construction or renovation of a particular facility or space will be accepted by the Church only if the Vestry has approved the construction or renovation. In the absence of such approval the funds will be placed into a fund offset building maintenance costs unless Committee designates it to be used otherwise with the approval of the donor. The Vestry must approve any space on the Church grounds which is designated in memory or in honor of an individual/s or institution.

- In the case of new construction or substantial renovation, it is the policy of the Church that the naming of a building requires a gift which defrays at least 51% and up to 100% or more of the total project cost.
- Pledges can be considered as part of the gift to name a space, facility or other physical space. Pledges of uncertain value may only be used to name a space if they are supported by a pledge to bring the final gift to the required naming level.
- Pledges that include both annual stewardship and capital components may only be used to name a space if the capital portion of the gift is equal to or greater than 80 % of the naming opportunity cost.
- Buildings, facilities and other physical spaces on the Church campus will be named for the life of the building, facility or space. Whenever possible, renovation of an existing building, facility or space will be accomplished in such a way that a pre-existing name may stay with the building, facility or space. When an existing building, facility or space is demolished, moved or changes substantially as to constitute a new building, facility or space, the original donor (or donor family) will be notified. Every effort will be made to retain all commemorative plaques taken from destroyed, moved or substantially altered spaces and to display these plaques within the new facility for historical reference or within another space on campus. Any change in the name of a building, facility or space will be reviewed by Committee and will be submitted to the Vestry for final approval.
- In the event a donor does not fully satisfy a pledge involving the naming of a physical space, the Church, with the guidance of the Committee, reserves the right to remove the named space recognition.

Gifts of Endowment

If the donor designates a gift for endowment, the Church will regard the request as a condition for accepting the gift and it will be held in the Permanent Endowment Fund as an asset of the Church.

Acceptance and Disposition of Bequests

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369 This section governs the disposition of *bequests* which, for purposes of this statement, will mean
370 any type of gift in which the assets are transferred upon the death of the donor. The assets may
371 be in any form, such as cash, securities, personal property, real property, etc., subject to the
372 restrictions herein.

373 Bequests naming the **Endowment Fund** of the church as beneficiary are automatically
374 transferred to the Permanent Endowment Fund upon receipt. All other bequests can be spent in

375 the current year or placed in the endowment as part of the General Endowment Fund (quasi) and
376 held for a longer-term, as determined by the Committee.

377 If the donor has identified a specific purpose for the gift and the gift may be restricted as to
378 purpose in accordance with this Gift Acceptance Policy, the funds shall be used according to the
379 donor's wishes. The funds may be directed to their restricted purpose either as an endowment, in
380 which case they normally would become a restricted fund within the Permanent Endowment
381 Fund, or by direct expenditure of the funds through the Director of Finance and Administration.