Overview:

This policy seeks to reconcile and balance the need for financial support of Arizona Center for Investigative Reporting (AZCIR), as a non-profit organization, with the values of AZCIR, the foremost of which is editorial independence. AZCIR fails just as surely if it loses public confidence in its integrity as if it becomes unsustainable financially. This Policy acknowledges, too, that individuals and organizations invest in projects that further their own goals and values, directly or indirectly. Hence, this Policy is organized around three categories of donor intentions – those who seek to support investigative journalism in general, those who seek to support investigations in particular areas of interest, and those who seek to support specific investigations. This Policy also specifies the internal procedures applicable to all fundraising efforts by AZCIR.

The AZCIR Board of Directors retains full authority over this Policy and all fundraising efforts by AZCIR, and may reject potential donors for any reason, including to protect the best business interests of the organization. All donations to AZCIR are subject to compliance with this Policy, including provisions for transparency, the disclosure of donors’ identities, and the prohibition on acceptance of donations from political parties, elected officials, or others whose contributions may affect public perception of AZCIR’s independence.

Gifts and grants to support investigative journalism in general

AZCIR will seek and accept gifts and grants from individuals or organizations in any amount for the general support of AZCIR’s activities. Acceptance of these gifts or grants neither expresses nor implies any voice in editorial decisions beyond the broadly stated mission of investigative journalism. We expect that most gifts and grants of this type will come from foundations, organizations, and individuals concerned about the future of journalism in general and the future of investigative journalism in particular.

Gifts and grants to support investigations in particular areas of interest

AZCIR will establish a limited number of segregated funds to support investigations in specific areas of public importance, such as the environment, education, immigration or governmental integrity. To assure that donors respond to the priorities of AZCIR rather than AZCIR responding to the agenda of others, the Board will approve each fund before any gifts are solicited and accepted.
We expect most gifts or grants of this type to come from individuals interested in the subject area. AZCIR also will accept contributions from organizations if they agree to the following conditions, which also apply to gifts from individuals:

1. Gifts and grants are tied to a subject area defined by AZCIR but not to a particular project or investigation.

2. All donations of $10,000 or more will be announced at the time the gift or grant is received, and publicly acknowledged thereafter from time to time as funds are expended.

**Gifts and grants to support specific investigations**

AZCIR will consider gifts or grants to support particular investigative projects. All project-specific grants require approval from the AZCIR Board and will conform to the following conditions:

1. AZCIR exercises editorial control of any project. The donor specifically cedes any right to review editorial content or to restrict its distribution.

2. All funds are transferred to AZCIR prior to the start of the investigation and are not refundable.

3. Financial contributions to specific projects are totally transparent and public, with a disclaimer specifying the nature of the relationship between AZCIR and the donor.

**Procedures**

1. Fundraising is the work of the Board, management and designated staff, consultants or volunteers. Only those who are identified by AZCIR’s management and approved by the Board will be authorized to fundraise on behalf of AZCIR. All fundraising efforts by the Board, management, staff or volunteers will strictly adhere to this policy.

2. In the spirit of transparency, AZCIR will compile a complete list of donors from time to time and make the list available for public inspection through the AZCIR website and other reports.

   - AZCIR will not accept gifts from anonymous sources.
   - AZCIR will not accept gifts from political parties, elected officials, or others whose contribution may affect public perception of AZCIR’s independence.
   - Gifts may be in cash, in-kind services or tangible goods. If not in cash, a value will be attached to the gift as reasonably determined by AZCIR and the donor.
   - The list of donors will be published at least semi-annually, but may be published more frequently as directed by the Board.
   - AZCIR will never share donors’ personal information for the sake of advertising or other direct-mail efforts, unless the donor consents in writing in advance.
3. All checks or credit card transactions deposited to AZCIR must be intended by the donor to be given as a gift, meeting the criteria above.
   
   - Checks and debit or credit transactions should be made payable to the Investigative News Network. Instructions provided to donors for gifts to AZCIR should instruct the donor to make the check payable to Investigative News Network. [subject line should read for AZCIR].

   - An AZCIR Gift Deposit Form should be completed for each check, debit or credit card transaction sent to AZCIR. Where correspondence with the donor will be useful in documenting the intent to give the gift, such correspondence should accompany the Gift Deposit Form. In accordance with good donor stewardship practices and in compliance with all IRS regulations, all gifts will receive an acknowledgment in writing or by e-mail, which will be archived.

4. As technology develops, methods may be implemented to accept very small donations (“micropayments”) through online transactions. Unless otherwise specified, these contributions (ranging from pennies to $20) may be used to support any or all AZCIR projects.

5. Good internal control procedures must be followed. These include:
   
   - Restrictively endorsing checks “for deposit only” immediately upon receipt.
   - Depositing checks within five days of receipt.
   - Storing undeposited funds in a locked desk or safe overnight.
   - Reconciling deposits with gift deposit forms.
   - Where credit card payments are accepted, AZCIR will obliterate the credit card number from any copies of source documents after deposit.

6. Gifts of stock, real estate or other non-cash gifts not covered elsewhere may only be accepted following specific approval by the AZCIR Board.

7. AZCIR fund development practices and accounting for gifts must comply with all applicable laws and Internal Revenue Service, state of Arizona and other relevant regulations.