

**STUDENT ALTERNATIVES PROGRAM, INC. DBA TRIUMPH PUBLIC HIGH  
SCHOOLS (TPHS)  
BOARD POLICY MANUAL  
POLICY GROUP 5 – FISCAL MANAGEMENT  
FUNDRAISING**

**PG-5.290**

**Sec. 1. PURPOSE OF POLICY.**

Through this policy, the Board of Directors (hereafter, the “Board”) of Student Alternatives Program, Inc. doing business as Triumph Public High Schools (TPHS) (hereafter, the “Charter District”) shall address the legal requirements, as applicable, pertaining to the fundraising activities of the Charter District.

**Sec. 2. APPLICABILITY.**

This policy pertains to the receipt, safeguarding and use of funds received by Charter District personnel. This policy supplements the Board’s Policy for Gift Acceptance.

**Sec. 3. AUTHORITY OVER FISCAL MATTERS.**

**Sec. 3.1.** Unless otherwise indicated, the Board’s Policy PG-5.001, Authority Over Fiscal Matters, will govern and control over the policy statements set forth in this Policy PG-5.290.

**Sec. 3.2.** For the Board policy pertaining to the Delegate and designee, see Section 3.2 and Section 4 of PG-5.001.

**Sec. 4. CONTRIBUTIONS RECEIVED.**

**Sec. 4.1. Cash Defined.** For purposes of this policy, cash means coin, currency, money orders, cashier’s checks, personal checks, and business checks, including any funds maintained in a bank, investment, savings, or other similar account.

**Sec. 4.2. In-Kind Contributions.** In-kind contributions are recognized and recorded at fair market value on the date received. The donor must provide the fair market value of the donated item or service.

**Sec. 4.3. Contributions to the Charter District Child Nutrition Program.** The Charter District’s Child Nutrition Program (CNP) staff must collect and deposit all monies received from students, or their parents or guardians, for meals and snacks. CNP staff must also create and maintain records of all such payments to provide parents (or guardians) and students timely, accurate account balances.

**Sec. 4.4. Contributions Received by Campus.** Campuses are only authorized to receive cash and credit card contributions from donors. Moreover, campus principals may not accept a contribution governed by the Board’s Policy for Gift Acceptance.

**Sec. 4.5. Contributions Received from Vendors.** Charter District officers, as defined in Section 5 of PG-5.001, and employees may not receive contributions directly from any vendor. If a vendor

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makes a cash or in-kind contribution to an officer or employee, the officer or employee must route the contribution to the Delegate or designee. The Delegate or designee must maintain proper control of the contribution. See Board Policy relating to Gift Acceptance for additional requirements.

***Sec. 4.6. Special Events.*** The Charter District may organize special events for the purpose of raising funds from donors. Charter District officers, as defined in Section 5 of PG-5.001, must ensure that special events yield fundraising results that exceed the cost of the event by at least fifty percent (50%).

***Sec. 4.7. Use of Unrestricted Contributions.*** An unrestricted contribution is a contribution from a donor who did not require that any condition(s) be met so that the contribution may be used. In this instance, the Charter District may use an unrestricted contribution for any lawful purpose. However, unrestricted and lawful purposes do not mean “any purpose” but rather means and is limited to an authorized charitable purpose of the Charter District that is in furtherance of the Charter District’s mission and in the best interest of students. The applicable grant or donation agreement must also be considered and reviewed to confirm. If there are any doubts on use or if it is unclear, the Delegate or designee should confirm intent and/or approval in writing with the donor.

***Sec. 4.8. Use of Restricted Contributions.*** A restricted contribution is a contribution from a donor who stipulated, in writing, that a specific condition(s) must be met so that the contribution may be used. In this instance, the Charter District may only use a restricted contribution as stipulated by the donor. To ensure compliance with the donor’s stipulation(s), the Delegate or designee must obtain a written agreement from the donor setting forth the specific condition(s) that must be met to enable Charter District to use the contribution received.

***Sec. 4.9. Reports to Donors.*** The Delegate or designee should provide a report to donors disclosing the uses of their contributions.

***Sec. 4.10. Compliance with Donor Agreements.*** The Delegate or designee must ensure compliance with any donor/grant agreement and periodically review the same.

**Sec. 5. TAX-EXEMPT LETTER.**

***Sec. 5.1. Other Policy.*** See Board Policy relating to Gift Acceptance.

***Sec. 5.2. Upon Request from Donor.*** The Charter District must issue a tax-exempt letter to a donor upon request or as otherwise where required by law.

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***Sec. 5.3. Written Acknowledgement of Certain Donations.***<sup>1</sup> In accordance with the Internal Revenue Code and Treasury Regulations, a donor is prohibited from claiming a tax deduction for any single contribution of \$250 or more unless the donor receives a contemporaneous, written acknowledgement of the contribution from the Charter District. To facilitate the donor's compliance with applicable law, the Charter District may provide a donor contributing \$250 or more with a timely, written annual statement that includes, on the Charter District's letterhead:

- (a) The Charter District's name;
- (b) The amount of the cash contribution(s) received from the donor during the calendar year;
- (c) A description (but not the value) of the non-cash contribution(s), if any; and
- (d) A statement that no goods or services were provided by Charter District in return for the contribution, if applicable; or
- (e) A description and good faith estimate of the value of goods or services that Charter District provided in return for the contribution, if applicable.

***Sec. 5.4. Form of Written Acknowledgement.*** The Charter District may provide the written acknowledgement via U.S. Postal Service or electronic mail.

***Sec. 5.5. Contemporaneous Defined.***<sup>2</sup> For purposes of Section 5.2 of this policy, the Charter District must provide the donor with a written acknowledgement by January 31 of the calendar year following the receipt of the donor's contribution.

***Sec. 5.6. Records.*** The Delegate or designee shall create, obtain, and maintain adequate and sufficient records to support the receipt of contributions and fundraising proceeds, as required by applicable law, rule and policy.

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<sup>1</sup> I.R.S. Publication 1771 (Rev. 3-2016) Catalog Number 20054Q, page 2

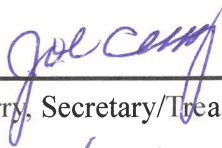

<sup>2</sup> Ibid, page 3

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**CERTIFICATION**

The Undersigned, being the Secretary of the Board, hereby certifies that the foregoing represents a true copy of the Board Policy PG-5.290, Fundraising, as adopted by the Board on May 16, 2026, which Policy is in full force and effect and has not been amended or repealed.

  
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Joe Curry, Secretary/Treasurer  
  
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Date Certified