

**LWVIEF  
AND  
THE LOCAL LEAGUE**



**League of Women Voters of Indiana Education Fund**

**445 North Pennsylvania Street, Suite 910**

**Indianapolis, Indiana 46204**

# LWVIEF and the Local League

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## How LWVIEF Works

**Why an Education Fund?** Contributions to local or state Leagues—or to LWVUS—are not deductible from federal income tax, because of the lobbying activities of LWV. Education of the public, another major part of League work, does qualify for federal income tax exemption, but only if handled by a separate corporation established for that purpose. Such corporations, called education funds, are used by Leagues across the country to receive and spend 501(c)(3) tax-deductible and tax-exempt funds.

**The League of Women Voters Indiana Education Fund, Inc. (LWVIEF)**, an Indiana nonprofit corporation, accepts contributions that the donor may deduct for federal income tax purposes. It does not attempt to influence legislation, but rather supports the League's education of the public, including voter service. League of Women Voters Indiana Education Fund, Inc. (LWVIEF) was incorporated in 1979, and qualified for 501(c)(3) status in 1982. The LWVIEF Articles of Incorporation and By-Laws delineate its purpose and structure. Its membership consists of the LWVIN board, which may appoint additional assistant officers. LWVIEF conducts its own meetings and activities, uses separate accounts, and is responsible for maintaining its 501(c)(3) status.

**The Connection with Local Leagues** – LWVIEF covers its own expenses and conducts statewide projects. In addition, it serves as the administrative agent for local League education funds, freeing a local League from the need to create a nonprofit corporation. Nearly all local Leagues use this service. LWVIEF does not charge fees and does not pay interest on the funds in its accounts.

Maintaining an individual internal account for each participating League, LWVIEF not only accepts deposits and dispenses payments; it also ascertains that each transaction conforms to federal regulations concerning 501(c)(3). Each project must have approval from LWVIEF. Both LWVIEF and the local League follow procedures that are described in this document. These procedures are created to meet IRS expectations, including the guidelines by LWVUS included in the appendices.

**The Assistant Treasurer of LWVIEF**, as the contact person and consultant for local Leagues, explains and facilitates processes and prepares all transactions. Contact information for the assistant treasurer can be found at [www.lwvin.org](http://www.lwvin.org).

**Contact Information** – LWVIEF has at the same address as LWVIN.

**Forms** for LWVIEF business are appended to this document (see appendices) They are also available from the assistant treasurer and the state office and can be downloaded from [http://www.lwvin.org/about/Member\\_Resources.html](http://www.lwvin.org/about/Member_Resources.html). There are four forms:

- [Deposit form](#)
- [Transfer of Funds form \(for transfer from account to PMP\)](#)
- [Project Approval Request form](#)
- [Final Project Report form](#)

**Opening a Local LWVIEF Account** – When a local League decides to open an account, the LWVIEF assistant treasurer can provide counsel. Using the Deposit form, an initial deposit check is sent to LWVIEF. The check must constitute a tax-deductible donation; it may not come from local League funds. For details, see **Donation Deposits**, below.

**Donation Deposits** are by check only. All donation checks must be made out by the donor directly to “LWVIEF” or “League of Women Voters Indiana Education Fund, Inc.” No other recipient must be mentioned. Donation checks made out to the local League or to LWVIN cannot be accepted. Only LWVIEF has the 501(c)(3) tax deductible status. Processing donations in any other way than directly to LWVIEF threatens this status.

Checks from the local League itself cannot be used to transfer donations. They can be used for certain secondary transactions, such as the return of a project surplus.

It is crucial that potential donors observe the distinction between general and tax-exempt donations. Any appeal for donations, such as an annual dues letter, should stress this. A contribution for the local League’s work in general is not tax deductible and is made through a check to the local League. Checks for tax-deductible contributions to a participating local League must be made out to the state education fund as shown above. The local League collects these donations and sends them to LWVIEF, accompanied by the Deposit form.

The state office sends a verification of deposit, and the local League checks it for corrections.

Local Leagues are expected to thank their contributors themselves. Some donors may prefer not to be named publicly.

A donor may request verification of the 501(c)(3) status of LWVIEF. A copy of the 1982 approval letter from the IRS is available from the state office.

**Two Kinds of Donations to LWVIEF** – A donation may be unrestricted or may be designated by the donor to support a specified project or cause. Designated funds are restricted to the stated purpose. Donations solicited through a League appeal solely for stated causes are restricted. The local League must keep clear records protecting each restriction.

The local League must have LWVIEF approval **before** issuing a designated appeal for tax-deductible contributions, because a project could later be deemed ineligible for tax exemption, with unfortunate consequences for donors. For the same reason the local League must ascertain that a project designated by a donor meets IRS requirements. If a donor designates a specific project, consult with the LWVIEF assistant treasurer regarding IRS requirements before committing to the project.

Most donations are likely to be unrestricted. The donor of a designated contribution, or a League issuing a designated appeal, may stipulate that if the restricted fund exceeds the cost of its project, the surplus shall be unrestricted.

**Records** by the local League must show all detail including the identification of restricted donations. The local treasurer should keep LWVIEF data separate from general operating data and should report them to the membership separately. The accounting records of the local League's general fund and the education fund must not overlap.

At the beginning and at the middle of the fiscal year the assistant treasurer sends an LWVIEF account summary to the local League president and treasurer. The local treasurer makes certain that it agrees with local records.

**Per Member Payment (PMP) and LWVIEF** – A local League may use tax-deductible funds to cover up to 50% of its national PMP and 10% of its state PMP. Up to these limits (only), the local League may use either unrestricted LWVIEF funds, or donations dedicated to PMP, or a combination of these.

Donors may designate tax deductible contributions directly for a given year's PMP, without transmitting them first to the local League's LWVIEF account. Such checks must be made out by the donors to LWVEF (LWVUS Education Fund) or LWVIEF, as the case may be, with a notation of their PMP purpose for a particular League. As stated above, the total tax-deductible allowance of a local League cannot exceed the 50% (national) and 10% (state) limits.

The local League requests both state and national PMP disbursements from its LWVIEF account, using the Transfer of Funds form.

The partial state PMP payments are transferred from the local League's LWVIEF account to LWVIEF itself. This is an internal bookkeeping process. For national PMP payments, LWVIEF issues a check to LWVEF and sends it to the local League, which, in turn, forwards it to the League of Women Voters of the United States Education Fund (LWVEF).

If a local League promises in its fundraising appeal that all tax-deductible contributions will be spent locally, it may not use the resulting LWVIEF funds for PMP.

**Cancelling a Local League LWVIEF Account** means to completely use all the funds in the account. It is not difficult to reopen the account with additional deposits, but it is preferable to keep the account open. If a local League chooses to administer its own education funds, it should contact the assistant treasurer for guidance.

## **Obtaining Approval for a Local League Project**

**Eligible Projects** – Each project must be educational or informative. It must be nonpartisan. It must be intended for the general public, not just for members. Usually it is local in scope and focus, but not always.

While League members should participate, they cannot be the primary audience. Membership meetings and internal publications are not eligible. In-kind contributions are not tax deductible.

The goal must be to provide public information in a fair and objective manner (see *Advocacy Activities that Leagues May Undertake Using Charitable 501(c)(3) Monies*). The project must not seek to affect specific legislation. When political parties or candidates for office are involved, the purpose must be solely for education of the public, such as a candidates' debate.

Issues which interest the League may well be the topics of educational public meetings. However, any research or analysis must include a fair representation of all facts and information, so as to provide a clear opportunity for disagreement with the conclusions of this research or analysis. Support for League positions or calls for action cannot be sought.

Funds may be used for equipment that will be used for other LWVIEF-related activities after the immediate project is completed. If the equipment will be used for other activities, such as membership or advocacy, a reasonable charge should be paid from operating funds. For example, if a local League purchases a sound system for public educational meetings, but then uses this equipment for a membership meeting, the local League should reimburse their fund account a justifiable amount for its use. Good recordkeeping is important. If it is known that eventually the equipment will be used for non-education fund activities, then it is recommended that a portion of the original cost of the equipment be paid with operating funds.

Examples of possible projects:

- Voter service and citizen information, such as candidate debates, public promotion of voter registration and the voting process, and candidate questionnaires.
- New local study items (public meetings, publications, etc.), to the point of a public consensus (not League consensus).
- Public meetings, publications, recordings, etc., on current topics, presenting all sides and providing balanced, nonpartisan information.
- Publications listing local services and governmental agencies or elected officials.
- Publications describing the local community, e.g., *Know Your County*.
- Radio or television presentations that discuss issues in a nonpartisan manner.
- Purchase and distribution to the public of state or national education fund publications or of other educational publications, recordings, etc.
- Public meetings on one side of an issue, such as a single-payer health plan.

**Project Budget** – A project has a limited, one-time goal and is funded outside the regular local League budget, although it may draw in part on general local resources. The local treasurer should prepare and then maintain a project budget separate from the regular local League accounting. **A project budget is required for planning, approval of a project, and the final report.**

The project budget prevents distortion of the regular local budget insofar as it accounts separately for certain expenses that may otherwise burden the regular budget, such as postage or supplies. It should reflect the true full cost of the project, even if not all funding is expected to come from LWVIEF.

In general, a project budget is worded and organized like a regular budget, and approved by the local board as part of the Request for Approval. The following example concerns a new edition of a publication called *Know Your County*:

Income

|  |          |
|--|----------|
| Local League IEF account .....             | 673.00   |
| Special non-tax-deductible fund drive..... | 100.00   |
| From cumulative reserves .....             | 200.00   |
| Total .....                                | \$973.00 |

Expenses

|  |          |
|--|----------|
| LWVIEF project application, approval, reports..... | 3.00     |
| Writing, editing donated .....                     | -0-      |
| Preparing camera-ready copy (50 pp.).....          | 100.00   |
| Printing .....                                     | 630.00   |
| Paper.....   | 100.00   |
| Binding .....                                      | 100.00   |
| Distribution, publicity.....                       | 40.00    |
| Total .....  | \$973.00 |

**Acknowledgments and Credits** – Whenever LWVIEF funds are used for printed matter, including programs for public meetings, the publication **must** contain a statement crediting LWVIEF. It may also recognize donors if their approval has been obtained in advance.

Sample statement: "Funding was made possible in part by the League of Women Voters Indiana Education Fund, Inc., through contributions by Mr. X, Y Company, and Z Foundation."

**Project Approval Request** – Start early! After a project has been approved by the local board, a Project Approval Request form is sent to LWVIEF, with an explanatory statement and other supporting material if available (see below). Because the LWVIEF board will consider the request at a meeting and may ask for additional information before acting during a second meeting, this should be done as long as possible before the desired starting date and no later than four weeks in advance.

Early submission is particularly important when donations dedicated to the project are to be raised. If a project ultimately is not approved, already received dedicated donations will have to be returned, an embarrassing procedure and a legal hassle for the donors, who may have taken the tax deduction already. Also, the local League cannot seek funding from other sources, like foundations, before the project is approved.

If a project begins before receiving LWVIEF board approval, the local League risks having to cover the cost from its regular local funds.

Early submission is recommended even for a project that may later be abandoned before starting. An application and approval does not constitute a final commitment. A commitment will be expected once funds are disbursed.

**Project Explanation and Supporting Material** – To help the LWVIEF board understand the project, the local League will provide as much information as it can. Accuracy is important, because the initial project budget and statement will play a role at the project’s conclusion. No project will be considered without a budget. Requests must be properly signed and dated.

Include the following:

- General: Format/structure, purpose, publicity plans.
- For publications: Prior edition if any (copy to be enclosed if available), project personnel, printer, date of publication, distribution and storage plans. Approval must be sought even for revisions and new editions of previously LWVIEF-approved publications.
- For meetings: Time, place, participants, purpose, duration, other sponsors if any.
- For income: Projected sources as itemized on the form; fundraising plans; in-kind donations
- For expenses: As itemized on the form; labor costs (nonmembers only).

Funds may not be used for unrelated handouts to attendees, or to compensate League members for their labor.

**Project Approval and Disbursement** – The LWVIEF board announces its decision promptly. An initially denied proposal will be returned to the local League with explanation and for modification so that it conforms to IRS rules.

The local League may request full or partial disbursement at the beginning of the project, or it may prefer that payment be delayed. Delaying the payment until the project’s conclusion has the advantage that, if expenditures stay below the approved amount, no surplus will have to be returned.

LWVIEF disburses payments by check to the local League, up to the balance in the local League’s account minus funds restricted to other uses. **Overdrafts are not permitted.**

**The Project in Progress** – Approval is limited to one year. A project lasting longer than one year must seek re-approval so that continued compliance is assured. The character of the project must not change without approval.

It is best to plan early how the project’s success will be evaluated—for the local League’s own appraisal and for the final report.

Approved funds may be used only for the designated project. At the end, unused funds are returned, by check to LWVIEF, to the local League’s account at LWVIEF.

If actual project costs to be paid from LWVIEF will exceed the requested amount, the local League must contact the assistant treasurer. If actual total costs are less than 110% of the approved amount,

the matter will be resolved by the LWVIEF treasurer for resolution . If the actual costs match or exceed 110% of the approved amount, the matter will be presented to the LWVIEF board for resolution.

**Final Project Report** – A detailed final report is required within one month of project completion, to document compliance with IRS regulations. It can be combined with a request for final disbursement. Failure to submit a timely report seriously jeopardizes future applications by the same local League, because LWVIEF’s tax-exempt status depends on the reliability of its operation and records. Submitting the final report is the local League's responsibility; no inquiry by the state office should be expected.

The following points should be addressed:

- Purpose: LWVIEF needs to know whether the project achieved its stated purpose. This is an important issue in the final report. An evaluation is best planned at an early stage.
- Expenses: Submit a comprehensive itemized statement of expenses paid from LWVIEF funds, attaching photocopies of all documentation such as receipts, bills, expense vouchers, and canceled checks. The terminology should be the same as in the original project budget.
- Reconciliation: If the final fiscal statement does not closely match the approved budget, an explanation of actual vs. budgeted data must be included.
- Publications: If the project is a publication, a copy of it should be included. List names of writers and editors if they do not appear in the publication, name of printer, and number of copies reproduced, cost per copy including costs of distribution and promotion, and current storage if any.
- Meetings: If the project is a public meeting, lecture, etc., list names of presenters, place, date, time, number of attendees, co-sponsors if any, and evaluation results if any.
- Excess income: If the LWVIEF disbursement received by the local League exceeds the costs, as shown in the fiscal report, the surplus must be promptly returned to be credited back to the local League LWVIEF account. If the surplus consists of restricted funds raised solely for the project, the consent of donors must be obtained to convert to unrestricted funds. If the donors’ consent is not obtained, the excess funds must be returned to the donors, a nuisance because of the tax deduction involved.
- Later sales income from LWVIEF-supported publications must not be mingled with the general League fund. It must be deposited in the local League’s IEF account.

### **Checklist for LWVIEF Projects**

- Become knowledgeable about the League of Women Voters Indiana Education Fund, Inc. (LWVIEF).
- Discuss and approve an education fund project at a local board meeting. Verify what LWVIEF funds are needed and available.

- Establish an LWVIEF account if none exists for your local League. Make sure the local League treasurer understands LWVIEF policy and procedure.
- Submit a comprehensive Project Approval Request form including a budget to the LWVIEF board of directors **before** starting a project. Decide whether you want funding immediately or later.
- Wait for approval by LWVIEF before you start. Allow at least four weeks for approval.
- Solicit unrestricted funds to support this and other IEF projects as needed. Checks payable to: League of Women Voters Indiana Education Fund, Inc., or LWVIEF.
- Solicit restricted funds to support this project only **after** approval of the project is received from LWVIEF. Checks payable to: League of Women Voters Indiana Education Fund, Inc., or LWVIEF. Keep a separate record of restricted funds.
- Deposit tax-deductible contributions in the LWVIEF local account, using the designated Deposit Form.
- Complete the project within one year of approval, or re-apply.
- Submit a Final Project Report form within one month of completing the project.

## **Appendices**

[League of Women Voters Indiana Education Fund, Inc., Deposit Form](#)

[League of Women Voters Indiana Education Fund, Inc., Transfer of Funds from Local League Account](#)

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