

MASSACHUSETTS GENERAL HOSPITAL
ADMINISTRATIVE MANUAL
SOLICITING, DIRECTING AND STEWARDING CHARITABLE CONTRIBUTIONS TO MGH

The MGH Development Office is charged with the exclusive responsibility for management of the solicitation, receipt and recording of all charitable gifts from individuals, foundations and/or corporations in coordination with Partners Research Management and the Office of General Counsel/Office of Interactions with Industry, as appropriate.

SOLICITATION OF CHARITABLE CONTRIBUTIONS AND HIPAA COMPLIANCE

In order to avoid duplicative and competitive solicitations of gifts from individuals, foundations and/or corporations, and in order to comply with our institutional legal responsibilities as a charitable organization, the Development Office is exclusively responsible for the management of all fundraising related activities. If you wish to raise philanthropic dollars, or if you are offered philanthropic support for any purpose from any source, you must coordinate with the Development Office early in the solicitation process. Further, the Health Insurance Portability and Accountability Act (HIPAA) contains additional requirements for fundraising that must be coordinated appropriately with the Development Office.

HIPAA regulations for fundraising involving patients allow Massachusetts General Hospital to know and use, without patient consent, department of service information, treating physician(s) name(s) and outcome information to communicate with patients about fundraising initiatives. Mass General may also send fundraising information to patients based on demographics such as name, address, gender or date(s) of service.

While providing a greater opportunity to reach out to patients about ways to provide philanthropic support to the hospital, HIPAA regulations require opt-out language in all fundraising communications (written and oral). There are many details to the opt-out guidelines and a few of the significant components are: providing easy-to-use methods for someone to submit an opt-out request; immediate processing and tracking of all requests; and no expiration date for an opt-out request. In order to comply with these regulations all fundraising-related outreach to patients and donors should be facilitated and coordinated by the Development Office.

Please contact the Development Office for assistance in understanding and working with HIPAA regulations for fundraising.

Charitable contributions must be remitted to the Development Office and should never be deposited directly into a departmental or sundry fund account. Per hospital policy charitable contributions to the MGH should never be deposited to a MGPO fund. Gifts may be used to support MGPO activities but must first be processed as philanthropy by the Development Office and deposited to an MGH sundry fund.

Gifts from any for-profit entity, including, but not limited to, pharmaceutical and medical device companies, in support of any Partners educational or research activities at the hospital also need to be received by the Development Office. The Development Office will work with the Partners Office for Interactions with Industry, which is the business office responsible for reviewing and approving these gifts. Partners educational activities may include, but are not limited to: clinical fellowships, symposiums, public forums, visiting professorships, educational materials such as newsletters or journal club support grand rounds and CME course offerings.

Gifts from pharmaceutical and medical device companies in support of research are also received by Development.

COMMUNITY FUNDRAISING

Fundraising through email, social media networks and/or crowdfunding sites should be coordinated through the Development Office to ensure that online efforts meet guidelines for appropriateness and that donations are properly reconciled. If the use of crowdfunding is determined to be appropriate, the Development Office has a preferred platform that has been approved for institutional fundraising activities. Community fundraising events

and events organized by employees or third-party groups and individuals should also be coordinated through the Development Office. If you are contacted about organizing a fundraising event, please direct these inquiries to the

Community Fundraising team within the Development Office at mghcommunityfundraising@partners.org or 617-724-790. A resource for community events is located [here](#), and the policy on Fundraising by Employees and Community Groups can be found in the eLucid Policy Manager.

MGH Human Resources has established rules restricting solicitation of individuals and distribution of materials on hospital property. The hospital will permit charitable solicitation each year for the MGH Fund and United Way as part of the My Giving Helps Campaign, and in any given year may authorize one additional charity for fundraising at the MGH as determined by the president of MGH. The full MGH Human Resources Solicitation and Distribution policy can be found in the eLucid Policy Manager.

Once charitable gifts are received, the Development Office is also responsible for monitoring gift funds, in partnership with Finance. For funds that are received to support research activities, this monitoring function is coordinated with the Office of Research Management.

DIRECTING AND STEWARDING CHARITABLE CONTRIBUTIONS

The procedures for directing gifts have been established in order to process all contributions to the hospital promptly and accurately. This process meets fiscal and legal standards and requirements and thereby protects the institution's non-profit status.

Contributions from patients and/or their families, corporations and private foundations should be directed to the Development Office. If gifts are received by another department, these should be forwarded immediately upon receipt to the Development Office. Checks, along with their original mailing envelope and a copy of any correspondence from the donor, should be included. If no written correspondence from the donor is available, a representative from the department forwarding the gift should provide a written understanding of the donor's intended use for the gift, along with the name of the person to be acknowledged or notified. A valid PeopleSoft sundry fund number to which the gift should be credited should also be included. If you are arranging for a gift of equipment, please contact the Development Office so that the gift can be recorded and receipted appropriately.

Once received by the Development Office, the gift will be credited to the appropriate fund, and an official tax receipt and acknowledgement will be sent to the donor. This receipt will provide the donor with necessary tax information and the institution's written assurance that the contribution will be used as stipulated. All funds must be expended in a manner consistent with contractual obligations, donor directives and other external commitments if they exist.

If an appropriate sundry fund has not been established prior to the receipt of the funds, the Development Office will hold the funds and coordinate with you and the MGH Finance or Research Finance to see that a fund is established. Sundry fund expenditures follow Partners Healthcare Policy and Procedures for Sundry Fund Management which can be found in the eLucid Policy Manager.

To make arrangements to have a gift picked up contact (617) 726-2200. For further information, please contact:

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REVISION DETAIL:

ISSUED:	MGH DEVELOPMENT	(12/10)
APPROVED:	SENIOR MANAGEMENT	(12/20/10) (5/14) (3/16) (9/18)
REVISED:	MGH DEVELOPMENT	(2/14) (2/16) (12/17) (9/18)
	OFFICE OF GENERAL COUNSEL	(5/14)