

COLLEGE OF  
MICRONESIA-FSM

**BOARD POLICY No. 1490**

**(DRAFT)**

**Endowment Governance and Investment Policy**

Date Adopted:

Date Revised:

Date Reviewed:

References: BP 1440 (Investment Policy), BP 1450 (Endowment Fund), BP 1460 (Fundraising); Investment Policy Statement, Public Law 7-79, Board Bylaws Article V, Strategic Financial Plan 2025–2030

**I. Purpose and Scope**

This policy consolidates and replaces Board Policies 1440 (Investment Policy), 1450 (Endowment Fund), and 1460 (Fundraising). It establishes a unified framework to govern the College of Micronesia-FSM's endowment fundraising, fund management, investment strategy, and spending policy.

The purpose of this policy is to support the College's long-term financial sustainability, reduce dependence on external contributions through prudent investing, and ensure alignment with donor intent and Public Law 7-79.

This policy reflects the fiduciary responsibility of the Board of Regents and provides for disciplined oversight, risk-informed investment, cost control, and transparent stewardship.

**II. Governance and Fiduciary Oversight**

The Board of Regents shall exercise fiduciary responsibility over the Endowment Fund and all related fundraising, investment, and expenditure activities solely in the long-term interests of the College of Micronesia-FSM, in accordance with Article V of the Board Bylaws, Public Law 7-79, and applicable institutional and ethical standards.

The Board shall establish a three-member Endowment Oversight Committee to oversee endowment policy implementation, fundraising performance, investment strategy, and fund

utilization. The committee shall:

- Monitor and review endowment performance reports and make policy recommendations to the full Board.
- Approve fund manager selection, asset allocation adjustments, and investment performance benchmarks in accordance with the Investment Policy Statement.
- Review annual fundraising and spending reports to ensure alignment with donor intent and Board-approved budgets.

At least one member of the committee shall possess relevant experience in finance, investment, or nonprofit fund management.

The Board may delegate administrative responsibilities to the President or designated officers, provided that:

- Delegations are documented in writing and reviewed annually.
- Quarterly and annual reports are submitted to the Committee and the full Board.

All individuals involved in the management or oversight of the Endowment Fund shall comply with conflict-of-interest standards and disclosure requirements as outlined in the Board Bylaws and applicable laws. The Committee shall ensure regular review of fundraising, investment, and expenditure activity for transparency and accountability.

### **III. Fundraising Strategy**

The College sets an annual fundraising target of \$600,000 in alignment with long-term financial projections and investment return assumptions for achieving endowment sustainability.

The Director of the Office of Institutional Advancement and External Affairs (IAEA) shall be responsible for leading and coordinating the College's fundraising activities. The Director shall:

- Develop and implement a multi-year fundraising strategy approved by the President
- Prepare an annual fundraising calendar aligned with institutional events
- Convene and chair a Fundraising Steering Committee, composed of at least five members representing College leadership, alumni, and external stakeholders
- Ensure the Steering Committee meets at least quarterly to review campaign performance and adjust strategies
- Coordinate donor cultivation, stewardship, recognition, and compliance with donor conditions
- Submit an annual fundraising report to the President and Board, including metrics, sources, trends, and outcomes

Fundraising sources may include:

- Private donations (alumni, corporations, diaspora communities)

- Grant funding from external agencies
- Government appropriations and matching contributions
- Capital campaigns and institutional fundraising events

#### **IV. Endowment Contributions and Use**

The College of Micronesia-FSM Endowment Fund was established in 1993 to support long-term institutional resilience through investment growth and donor contributions. The Endowment's objectives include:

- Minimizing dependency on external contributions by maximizing long-term investment returns within reasonable and prudent levels of risk;
- Exceeding earnings assumptions outlined in the Board-approved Investment Policy Statement;
- Controlling administrative and investment management costs to preserve net returns and promote efficient fund operations.

Contributions to the endowment may come from private donors, government appropriations, grants, or matching gifts, and shall be managed in accordance with this policy and donor-imposed conditions.

Withdrawals from the Endowment Fund are prohibited until the Fund achieves a three-year rolling average market value of at least \$20 million, as verified through audited statements. Exceptions are allowed only for:

- Payment of normal and reasonable investment management and administrative costs;
- Expenditures required by the specific terms of a restricted gift, donation, or endowment;
- Emergency disbursements as authorized by a two-thirds vote of the Board of Regents with written justification.

All uses of endowment funds must be incorporated in a Board-approved budget and comply with Public Law 7-79 and other applicable restrictions.

#### **V. Investment Objectives and Asset Allocation**

The College's Endowment Fund shall be managed with a long-term investment horizon of 20 years or more, allowing for interim volatility in pursuit of sustainable growth.

The Fund's objectives are to:

- Achieve a long-term nominal return of at least 7.1% annually, net of all investment-related fees;
- Exceed earnings assumptions identified in the Investment Policy Statement (IPS);
- Maintain positive real returns, using the U.S. Consumer Price Index (CPI) as the inflation benchmark;
- Support institutional financial goals while minimizing dependency on contributions.

Given the Fund's current underfunded status relative to its \$20 million distribution threshold, the College acknowledges the need to assume prudent investment risk to meet its objectives.

Strategic asset allocation shall be:

- Defined in the IPS and reviewed at least every three years;
- Diversified across asset classes to mitigate risk;
- Adjusted tactically by external investment managers within Board-approved parameters;
- Designed to ensure all investment securities offer competitive market returns consistent with the Fund's objectives.

Investment managers are expected to outperform a customized benchmark index weighted to the strategic asset allocation of the Fund. Over a complete market cycle, total Fund performance shall be evaluated relative to this benchmark.

Cost control shall be a standing priority. The College shall monitor and limit management fees, transaction costs, and administrative expenses associated with portfolio management.

## **VI. Spending Policy**

The College shall preserve the long-term value of the Endowment Fund while responsibly supporting institutional priorities.

No spending shall occur from the Endowment Fund until its 3-year rolling average market value reaches at least \$20 million, as verified by audited financial statements.

Once this spending threshold is met, annual withdrawals shall be limited to no more than 4% of the Fund's 3-year rolling average market value, unless otherwise authorized by a two-thirds vote of the Board of Regents through a written resolution with documented justification.

All proposed withdrawals shall:

- Be included in a Board-approved institutional budget;
- Comply with the purposes outlined in Public Law 7-79 and any donor-imposed restrictions;
- Be reviewed and endorsed by the Endowment Oversight Committee.

Emergency withdrawals may be authorized by the Board in extraordinary circumstances. Such actions require a two-thirds vote and a documented explanation of necessity, impact, and restoration plans.

Spending decisions shall be guided by long-term financial planning and regular performance reviews.

## **VII. Performance Monitoring and Reporting**

The Endowment Oversight Committee shall ensure regular evaluation of investment and fundraising performance to uphold transparency, accountability, and alignment with policy objectives.

Investment performance shall be reviewed quarterly with the Investment Advisor, and reported to the Committee and Board. Reports shall include:

- Return relative to a customized benchmark index, based on the Fund's strategic asset allocation;
- Asset allocation compliance and any deviations;
- Portfolio risk metrics (e.g., standard deviation, Sharpe ratio, drawdown analysis);
- Cost summary, including management fees and transaction costs;
- Rebalancing recommendations, if strategic targets fall outside approved ranges.

An annual investment performance report shall be submitted by the President or designee to the Board of Regents and include:

- Cumulative and annualized returns compared to benchmarks;
- Historical and projected funding progress toward the \$20 million threshold;
- Any policy violations, exceptions, or reallocation decisions.

Fundraising performance shall be reported annually by the Director of IAEA and shall include:

- Total funds raised by source (e.g., individuals, corporations, grants, events);
- Progress toward the annual \$600,000 target;
- Donor engagement and retention metrics;
- Summary of stewardship activities and donor recognition.

## **VIII. Donor Stewardship and Ethical Considerations**

The College of Micronesia-FSM affirms its commitment to donor trust, legal compliance, and transparency in all endowment-related activities.

All donor contributions shall be managed in accordance with their stated intent and applicable conditions. Expenditures must comply with the purposes and limitations set forth in Public Law 7-79, this policy, and any specific gift agreements.

The Director of the Office of Institutional Advancement and External Affairs (IAEA) shall oversee donor stewardship and ensure:

- Timely and transparent communication with donors regarding fund use and impact;
- Annual acknowledgment and reporting to major donors;
- Implementation of donor recognition programs;
- Coordination with Legal Counsel for reviewing major gifts and conditions.

All naming opportunities for facilities or programs arising from endowment gifts shall be governed by Board Policy 5801: Naming Opportunity of Facilities and Programs. This includes requirements for:

- Presidential recommendation and Board of Regents approval;
- Financial thresholds and endowment structure;
- Duration, modification, revocation, or renewal of naming agreements.

To ensure consistent review, acceptance, and stewardship of philanthropic gifts, the College shall develop an Administrative Procedure on Donor Gift Acceptance. This procedure will define acceptable gift types, review thresholds, approval authorities, documentation requirements, and protocols to safeguard donor intent and institutional integrity.

#### **IX. Policy Review and Amendment**

This policy shall be reviewed at least once every five (5) years, or earlier as needed in response to significant changes in market conditions, legal requirements, investment strategy, or institutional priorities.

The Endowment Oversight Committee shall lead the review process and may recommend amendments to the President and Board of Regents.

Upon approval by the Board of Regents, this policy supersedes and replaces the following:

- Board Policy No. 1440 – Investment Policy
- Board Policy No. 1450 – Endowment Fund
- Board Policy No. 1460 – Fundraising

All related administrative procedures, guidelines, and investment policies shall be updated to align with this Board Policy.