



Plan International USA

STATE DISCLOSURE POLICY

Policy Name:	State Disclosure Policy
Owner:	Deputy General Counsel
Approved by:	General Counsel
Effective Date:	12/6/2023
Version:	1.9
Applicable to:	Any Plan International USA employee or agent who is designing solicitation materials
Related Documents:	n/a
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State Disclosure Policy

Summary/Purpose

The purpose of this policy is to detail where and how to disclose legally required statements in the course of requesting donations from individuals: certain states require charities who solicit to include a disclosure statement on their solicitation materials, and a subset of these states also require such statement to be included on every written confirmation, receipt or reminder of a contribution/donation. To simplify implementation, the following policy is adopted to cover both circumstances at Plan International USA (Plan).

Definitions

- **Materials:** any document, mailing, pledge card, fundraising communication (including website, email, social media page, etc.) or other written material soliciting a contribution.
- **Contribution:** thing of value, such as a cash or non-cash contribution, or volunteer time.
- **Solicitation:** material which makes a request, directly or indirectly, for money, property, financial assistance or contribution, or the representation that such money, property, financial assistance or other contribution, or a portion thereof, will be used for a charitable purpose.
- **Receipt:** every acknowledgement, confirmation or receipt of a pledge to donate.
- **Statement:** Plan's current state disclosure statement, attached at page 4.
- **Clear and conspicuous:** noticeable and able to be easily read by a person of average sight without magnification.

Policy

All materials, solicitations and receipts must include Plan's current Statement and be consistent with the following requirements:

- a. The placement of the Statement must be clear and conspicuous and consistent with the relevant state format requirements (see page 3).
- b. If the material is part of a packet of materials that is being sent out in a single mailing or distributed together as one packet, it will suffice that at least one of the materials in the packet contains the Statement or the outer envelope containing the solicitation packet has the Statement printed on it.
- c. The material containing the Statement must be one which the recipient is given and not expected to return immediately - e.g., an envelope containing the Statement which is intended for a person to fill out and immediately return "on the spot" (such as in a face-to-face situation) does not meet this requirement. Plan discourages the practice of printing the disclosure on the return envelope in these situations; however, the disclosure printed on the back of a thank you letter, or separate insert will suffice.

- d. If the solicitation is done via social media (Twitter, Facebook, etc.), Plan's profile page on that platform must include a link to the Statement (rather than the Statement itself). This should include a one-step link to the disclosure page.
- e. The material must be sent to Plan's Proofreading Ask team (comprised of individuals from Marketing, Communications and LGC); a member from LGC will verify compliance with this policy.
- f. If the distribution of a solicitation is limited to one state or to only certain states, you will only need to include: (a) the introductory text preceding Florida's disclosure; (b) the state disclosure(s) for each state in which the solicitation is being distributed, abiding by the relevant state requirements (specified at the bottom of this page) regarding the size, formatting and text of the disclosure; and (c) the final statement that registration does not imply endorsement, to the extent not already included.

Responsibilities

Any Plan employees or agents who are designing solicitation materials must adhere to this policy.

Language

The following are further state-specific legal requirements for disclosure statements.

NORTH CAROLINA requires its entire disclosure to be at least 9-point type and conspicuous by use of one or more of the following: underlining, a border or bold type. When the solicitation consists of more than one piece, the statement must be displayed prominently in the solicitation materials, but not necessarily on every page. (All caps do not satisfy statutory requirements).

FLORIDA and **NEW JERSEY** (by implication) REQUIRE THEIR ENTIRE DISCLOSURES TO BE IN ALL CAPS.

NEW YORK requires its entire disclosure with print no smaller than **10-point bold face type** or, alternatively, no smaller than the size print used for the most number of words in the statement

(Referring to the other state disclosure statements).

MISSISSIPPI, PENNSYLVANIA, and by implication, **FLORIDA, NEW JERSEY AND NORTH CAROLINA** REQUIRE THEIR ENTIRE DISCLOSURES TO BE PROVIDED VERBATIM. As to the other disclosures, the shortest possible compliant text is provided in the attached sample.

You may change the margins, making them wider (e.g., for envelopes) or narrower; you may justify the margins (as shown); and you may adjust the spacing between the lines or use a different type of font, so long as the above rules are satisfied, including font size. A print shop might be able to produce an even smaller font than the sample that is still readily readable, so long as the disclosure complies with the foregoing requirements.

The attached State Disclosure Statement is fully compliant with these requirements.

Plan International USA, Inc. is a 501 (c)(3) not-for-profit charity incorporated in New York. Donations are tax deductible pursuant to IRC §170(c) to the fullest extent allowed by law. A copy of our current financial statements, IRS Form 990, program descriptions, annual report, and other information may be obtained free of charge by visiting our website www.planusa.org or by contacting us at Plan International USA, 275 Promenade Street Suite 225, Providence, RI 02908; 1-800-556-7918. The following is provided in accordance with state laws. **FLORIDA:** A COPY OF THE OFFICIAL REGISTRATION AND FINANCIAL INFORMATION MAY BE OBTAINED FROM THE DIVISION OF CONSUMER SERVICES BY CALLING TOLL-FREE, WITHIN THE STATE, 1-800-HELPFLA, OR VIA THE INTERNET AT WWW.FDACS.GOV/DIVISIONS-OFFICES/CONSUMER-SERVICES. REGISTRATION DOES NOT IMPLY ENDORSEMENT, APPROVAL, OR RECOMMENDATION BY THE STATE. **FLORIDA REGISTRATION #CH184.** **GEORGIA:** A full and fair description of the programs of Plan International USA and our financial statement summary is available upon request at the office and phone number indicated above. **MARYLAND:** For the cost of copies and postage, Office of the Secretary of State, State House, Annapolis, MD 21401. **MISSISSIPPI:** The official registration and financial information of Plan International USA may be obtained from the Mississippi Secretary of State's office by calling 1-888-236-6167. Registration by the Secretary of State does not imply endorsement. **NEW JERSEY:** INFORMATION FILED WITH THE ATTORNEY GENERAL CONCERNING THIS CHARITABLE SOLICITATION AND THE PERCENTAGE OF CONTRIBUTIONS RECEIVED BY THE CHARITY DURING THE LAST REPORTING PERIOD THAT WERE DEDICATED TO THE CHARITABLE PURPOSE MAY BE OBTAINED FROM THE ATTORNEY GENERAL OF THE STATE OF NEW JERSEY BY CALLING (973) 504-6215 AND IS AVAILABLE ON THE INTERNET AT <http://www.state.nj.us/lps/ca/charfrm.htm>. REGISTRATION WITH THE ATTORNEY GENERAL DOES NOT IMPLY ENDORSEMENT. **NEW YORK:** You may obtain information on charitable organizations and obtain a copy of our latest financial report from the New York Attorney General Charities Registry at www.charitiesnys.com or, upon request, by contacting the Office of the Attorney General, Charities Bureau, 28 Liberty Street, New York, NY 10005, or calling (212) 416-8401. **NORTH CAROLINA:** Financial information about this organization and a copy of its license are available from the State Solicitation Licensing Branch at 1-888-830-4989 (within North Carolina) or (919) 807-2214 (outside of North Carolina). The license is not an endorsement by the State. **PENNSYLVANIA:** The official registration and financial information of Plan International USA may be obtained from the Pennsylvania Department of State by calling toll-free, within Pennsylvania, 1-800-732-0999. Registration does not imply endorsement. **VIRGINIA:** Virginia State Office of Consumer Affairs, Department of Agriculture and Consumer Services, PO Box 1163, Richmond, VA 23218. **WASHINGTON:** Charities Division, Office of the Secretary of State at 1-800-332-4483. **WEST VIRGINIA:** Residents may obtain a summary of the registration and financial documents from the Secretary of State, State Capitol, Charleston, WV 25305. Registration does not imply endorsement. **WISCONSIN:** A financial statement of Plan International USA disclosing assets, liabilities, fund balances, revenue, and expenses for the preceding fiscal year will be provided upon request. Registration with any of these state agencies does not imply endorsement, approval or recommendation by any state.

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