



## **GRANT MAKING AND DUE DILLIGENCE POLICY & PROCEDURE**

### **Policy**

The Greater Salina Community Foundation is committed to the principles of good grant making and due diligence that includes, but is not limited to, the following:

- Grants are only made for charitable purposes.
- Grants are only made to organizations that are financially stable and well managed, and grants only are made for projects that are well-conceived and that the Board believes likely to be successful.
- No staff member, or staff member's family shall receive benefits from any grant. Further, no advisor, volunteer, donor, or any other related party who is involved in the grant review or recommendation of a grant shall receive benefits from any grant.
- Grants are to be used by each grantee for the appropriate purposes as approved by the Foundation's Board of Directors.
- In some instances, the Foundation will exercise expenditure responsibility over certain grants as required by the Pension Protection Act of 2006

### **Procedures**

#### **Grants are only for charitable purposes.**

The Executive Director and grant making staff is responsible for ensuring that all grants are for charitable purposes and that the proposed project falls within the scope of the organization's charitable mission. In the case of competitive grants, an official representative of the grantee must sign a "Grant Agreement Form".

In the case of noncompetitive grants, such as Donor Advised Grants and Designated Grants with a specific charitable purpose, an agreement is included with the grant to be signed and returned to the Foundation.

Federal legislation prohibits a donor advised fund from making grants, loans, compensation or similar payments (including expense reimbursements) to donors, advisors or other disqualified persons. Nor shall any disqualified person receive more than "incidental benefit" from a fund or from any grant recipient receiving a distribution from the fund. Thus, grants from donor advised

funds may not be used to pay for anything that might be perceived as a material benefit to the donor, advisor or other disqualified person – including dinner tickets, membership fees, golf fees, admission tickets or other gifts. If sponsorship of a fundraising event includes a material benefit, a grant from a donor-advised fund cannot be used for this purpose. Further, the IRS has taken the position that the charitable and non-charitable portion of a ticket are inseparable and the donor-advisor cannot correct the private benefit problem by offering to pick up the “non-charitable” portion of the ticket. Community Foundation grants must be entirely for charitable purposes.

**Grants only are made to organizations that are financially stable and well managed, and grants are only made for projects that are well-conceived and that the Board believes likely to be successful.**

Grant making staff is responsible for the thorough review of each competitive application received by the Foundation. In the case of Donor Advised Fund grants, the staff researches, and, if necessary, contacts each grantee to determine their 501(c)(3) status.

If the grant recommendation is for an organization that is other than a 501(c)(3) and 509 (a)(1) or (2) under the tax code, additional research and assessment (expenditure responsibility) will be undertaken. The procedure for expenditure responsibility is described below in Section 5.

**No staff member, or staff member’s family shall benefit from any grant. Further, no advisor, volunteer or donor who is involved in the grant review or recommendation of a grant shall benefit from any grant.**

On an annual basis, all staff, volunteers, and board members complete conflict of interest statements indicating that they will disclose any potential conflicts. If a board member or volunteer has a conflict with a particular grant application, then the person will abstain from voting on the grant recommendation.

In the case of Donor Advised Grants, each donor advisor must indicate that they receive no benefit from each grant they recommend. Each donor advisor receives a copy of the Donor Advised Fund Guidelines that clearly states that no grants may be recommended that will result in any type of benefit back to the donor or his/her family.

**Grants are used by each grantee for the appropriate purposes as approved by the Foundation’s Board of Directors.**

All competitive grants require a written final report including a description of how the grant was spent. If the funds were not used for the intended purpose, the Foundation asks for the funds to be returned.

### **Expenditure Responsibility.**

The Foundation shall exercise expenditure responsibility for: grants to noncharities; grants to international organizations without a US nonprofit status or determined equivalent; grants to private, non-operating foundations; and grants made from donor advised funds to organizations other than those described in section 170-(b)(1)(A), type III supporting organizations that are not “functionally

integrated” and any supporting organization if the donor or a related party controls or serves on the board of that supporting organization; or if the organization it supports is controlled by the donor or donor appointee. Foundation staff will determine if an organization falls within the above three categories by using one of the following sources to determine status: a review of the organization’s tax status determination letter from the IRS; consulting the GuideStar charity data base; receipt of written opinion of counsel; or receipt of written representation from grantee combined with sponsoring organization review of supporting organization’s governing documents, including a list of its board members, and written representations from each supported organization. Where expenditure responsibility is required the Foundation will follow the procedure described below:

- a. **Pre-Grant Research:** The Foundation will conduct a reasonable investigation of the grantee to assure that the grantee possesses the capacity to perform the charitable activity to be funded by the grant.
- b. **Written Agreement:** The Foundation and the Grantee organization will sign a written agreement which will define the charitable activities that will be accomplished with the granted funds. In most circumstances, general purpose funds are not permitted.
- c. **Separate Accounting:** Unless the grantee is another private foundation, the grantee must establish a separate account for the granted funds. Charitable dollars may not be co-mingled with non-charitable dollars.
- d. **Regular Reports:** The grantee must provide regular status reports on the expenditure of the funds and the progress made in fulfilling the charitable purpose as defined in the written agreement.
- e. **Report to IRS:** When filing the federal tax return for any year in which a grant was made by the Foundation that requires expenditure responsibility, the Foundation shall indicate that such payments were made and complete the appropriate schedule to said tax return. The schedule shall include a brief description of each expenditure including grantee name, expenditure amount, charitable purpose of expenditure and current status of the grant.