

Nondiscrimination in Grantmaking Policy

Approved by the Arizona Community Foundation Board of Directors on Wednesday, January 20, 2021.

ACF will not discriminate on the basis of race, creed, color, religion, sex, sexual orientation, gender identity or expression, national origin, ancestry, age, marital status, physical or mental disability, medical condition, political affiliation, military service or veteran status or any other legally protected characteristics (collectively, the “Anti-Discrimination Status”) in any of its activities or operations. These activities include, but are not limited to, provision of services and grantmaking.

Acceptance or Declination of Grant Recommendations

ACF shall not contribute to any organization which attacks or threatens violence against individuals or groups of individuals based on their Anti-Discrimination Status, or which acts to intentionally injure those individuals or groups of individuals. This Policy applies in consideration of grants from ACF’s Donor Advised, Collaborative, Field of Interest, and Discretionary funds.

ACF’s donor base also represents a wide range of religious beliefs and views, which are commonly reflected in grantmaking to churches, mosques, synagogues, temples, and other faith-based organizations. ACF respects religious freedom and will accept grant recommendations to faith-based organizations, without prejudice, insofar as such organizations do not attack, threaten violence against, or intentionally injure individuals or groups of individuals on the basis of their Anti-Discrimination Status.

Implementation

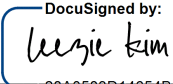
1. All members of ACF’s staff shall receive training on this policy annually. Such training shall comprise of methods for identifying organizations which attack or threaten violence against individuals or groups of individuals based on their Anti-Discrimination Status, including reviewing publications dedicated to identifying such organizations and key words and phrases that may signal discrimination on the basis of an individual or group’s Anti-Discrimination Status. Team members shall be trained to review publicly available resources, including but not limited to websites, social media accounts, press releases, media stories, and IRS Form 990.
2. Where staff are concerned that a grant recommendation received by ACF may violate this policy, such grant recommendations shall be flagged for further review during processing.
3. Upon receipt of grant recommendations of this nature, members of the Grants Management team shall assist the Chief Community Officer (CCO) in conducting an investigation into the proposed grant recipient’s mission, objectives, activities, and public statements. The Grants Management team and CCO may utilize publicly available resources to determine if the organization has attacked, threatened violence against, or intentionally injured individuals or groups based on their Anti-Discrimination Status. Such investigations must occur within three (3) business days of receipt of the grant recommendation to avoid extended delays in grant processing.
4. Upon completion of the investigation, if the CCO determines that the proposed grant recipient’s mission, objectives, activities, or public statements do not or may not conform with this Policy, the CCO shall prepare a report outlining such findings (the “Report”). The Report shall specify the sources of information upon

which such determination is based and include a description of the proposed grant recipient's mission, objectives, activities, or public statements that are believed to be in conflict with this Policy. The CCO shall deliver the Report to the Chief Philanthropy Officer (CPO) and the Chief Executive Officer (CEO) within two (2) days of completion of the investigation.

5. The CEO shall review the Report and may confer with the CPO. The CEO shall then deliver the Report to the Philanthropic Services Committee Chair with the CEO's recommendation as to whether the proposed grant recipient's mission, objectives, activities, or public statements conform with this Policy.
6. The Philanthropic Services Committee Chair shall review the Report and CEO's recommendation and may further confer with the CEO as necessary. The Philanthropic Services Committee Chair shall then determine if the proposed grant recipient's mission, objectives, activities, or public statements conforms with this Policy and whether the grant recommendation will be accepted or declined. The Philanthropic Services Committee Chair may optionally engage other members of the Philanthropic Services Committee in determining the proposed grant recipient's mission, objectives, activities, or public statements conforms with this Policy. If it is determined that the proposed grant recipient's mission, objectives, activities, or public statements do not conform with this Policy, the Grants Management team shall flag that organization for review of any future grants to that organization.
7. If the grant recommendation is declined, the CPO shall notify the donor-advisor's Relationship Manager of the declination so that the donor may be notified. ACF shall keep the Report, the recommendation of the CEO, and the decision of the Philanthropic Services Committee Chair confidential.

CERTIFICATE OF ADOPTION

The foregoing Nondiscrimination in Grantmaking Policy was duly adopted by the Board of Directors of the Arizona Community Foundation, Inc. effective as of January 20, 2021.

By:  Leezie Kim, Secretary Date: 1/22/2021