

In God We Trust Foundation, Inc.

Policy #13-06: Grants to Individuals

January 25, 2013

ADOPTED BY BOARD OF DIRECTORS

Grants to Individuals

The distribution of goods and services or funds to individuals is herein nominally referred to as “grants.”

Grants to individuals will be rarely if ever made, due to the cost of the expertise and properly evaluating entitlement and need. No grants will ever be made to insiders and relatives of insiders, including without limitation, officers, directors, staff, and other disqualified persons or entities.

All grants must meet the organization’s guidelines and objectives within its 501(c)(3) purposes.

It will be the organization’s preference to combine resources and work in concert with established exceptional nonprofits having high-quality projects in their particular areas of expertise. This approach augments good works, as opposed to duplicating and repeating overhead structures.

Any grant to an individual, must be made only upon compliance with the following procedure:

1. It will be awarded on an objective and non-discriminatory basis. To establish that any such grant is made on an objective and nondiscriminatory basis meeting the following criteria:
 - a. The group from which the grantees are selected must be reasonably related to the purposes of the grant, and the group must be large enough to constitute a charitable class (unless, taking into account the purposes of the grant, only a few individuals are qualified to be grantees - as in the case of scientific research).
 - b. The criteria used in selecting grant recipients from the potential grantees should be related to the purpose of the grant. For example, proper criteria for selecting scholarship recipients might include (but are not limited to) the following: past academic performance, performance on tests designed to measure ability and aptitude for college work, recommendations from instructors, financial need and the conclusions the selection committee might draw from personal interviews, and
 - c. The person or persons who select recipients of grants should not be in a position to receive a private benefit, directly or indirectly, if certain potential grantees are selected over others.
2. The procedure is reasonably calculated to result in performance by grantees of the activities that the grants are intended to finance; and
3. The organization would supervise the grant to determine whether the grantee has fulfilled the grant terms.
 - a. The organization will follow-up properly to determine whether the grantee has performed the activities that the grant was intended to finance and have not diverted grant funds away from the original purposes of the grant.
 - b. Periodic progress reports must be made to the organization, at least once a year, to determine whether grantees have performed the activities the grants are intended to finance, and
 - c. If these reports are not made or there are other indications that grants are not being used as intended, the foundation must investigate and take corrective action, and
 - d. The organization will keep records relating to all grants to individuals, including--
 - i. Information obtained to evaluate potential grantees,
 - ii. Identification of grantees, including any relationship of the grantee to the organization that makes the grantee a disqualified person,
 - iii. Amount and purpose of each grant, and
 - iv. Follow-up information, including required annual reports and investigation of jeopardized grants.

If more specific procedures are developed in the future in order to be prepared in the event a circumstance should ever arise where an individual grant might be made, those procedures will not differ

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materially from those described above, and will focus on providing greater detail to achieve proper implementation.

The following procedures will be followed by the organization in making any grants to individuals:

Selection Process-Candidates for Grants. Selection of individual grantees would be made by the organization on the basis of criteria reasonably related to the purposes of the grant including the merits of the proposal, credentials of the potential grantee, the relationship of the proposal to the organization's purposes and its priority organization for research involving health and longevity of humans, and related areas. On the basis of criteria relating to the particular grant program involved, an individual grantee may be selected (i) from a group of qualified candidates or (ii) without reference to a group of candidates because he or she is exceptionally qualified to carry out the charitable, education, or scientific purposes of the grant. The group of persons who select recipients shall not be in a position to derive a private benefit, directly or indirectly, if certain potential grantees are selected over others.

Solicitation. Individual applicants will not be solicited. It is anticipated that only on rare occasions will individual applicants approach the organization.

Selection. Applicants will be required to submit an application.

Screening. A screening of all individual applicants will be made by the Board.

Terms and Conditions Under Which the organization Makes Individual Grants

The terms and conditions of each grant to an individual are contained in a letter sent to each recipient of such a grant. The recipient is required to communicate his or her acceptance thereof by a letter in writing to the organization. Terms and conditions include: specific purpose of the grant, its duration, the total amount of the grant, requirements for narrative reports, including due dates for such reports.

Procedure for Exercising Supervision Over Individual Grants

With respect to individual grants, the organization will arrange to receive a completion report and for matters involving a period of time longer than 60 days, periodic progress reports. A Board will follow the matter and determine whether the grant purposes are being or have been fulfilled, and to inquire into any questions requiring further investigation.

Investigation where diversion of grant funds from their specified purposes is indicated.

Where reports to the organization or other information (including failure to submit reports after a reasonable time has elapsed from their due date) indicates that all or any part of grant funds are not being used for the purposes of such grant, the organization initiates an investigation. While conducting the investigation, the organization will withhold further payments to the extent possible until it has determined that no part of the grant has been used for improper purposes, and until any delinquent reports have been submitted.

If the organization determines that any part of a grant has been used for improper purposes, the organization will take all reasonable and appropriate steps to recover diverted grant funds or to insure the restoration of diverted funds and the dedication of other grant funds held by the grantee to the purposes being financed by the grant. These steps will include legal action unless such action would in all probability not result in the collection of a judgment.

If the organization determines that any part of the grant has been used for improper purposes and the grantee has not previously diverted grant funds to any use not in furtherance of a purpose specified in the grant, the organization will withhold further payments on the particular grant until (i) it has received the grantee's assurances that future diversions will not occur, (ii) any delinquent reports have been submitted, and (iii) it has required the grantee to take extraordinary precaution to prevent future diversions from occurring. If the organization determines that any part of the grant has been used for improper purposes and the grantee has previously diverted foundation grant funds, the organization will withhold further payment until the three conditions of the preceding sentence are met and the diverted funds are in fact recovered or restored.