

Guidelines for Gifts and Donations

American Public Health Association

Revised: March 2019

I. INTRODUCTION

The American Public Health Association needs to have the financial resources to continue to provide high-quality services and to expand its reach into important new initiatives. Rising costs and decreasing public funds have the capacity to jeopardize the public's health and stretch the already taxed public health system. To fulfill its mission, APHA must consider securing resources from external sources rather than relying on increasing member dues, conference registration fees, and publication costs.

These Guidelines for Gifts and Donations (Guidelines) apply to all donations received by APHA <u>from</u> corporations and/or corporate foundations only, solicited or unsolicited, including gifts and contributions received in support of APHA Sections and APHA Special Primary Interest Groups.

Government contracts and grants from independent foundations are not classified as gifts or donations and need not be evaluated by the Committee on Social Responsibility. Contracts or grants in amounts of \$100,000 per year and greater have the potential to shape the public health agenda of APHA and should be reviewed by the Executive Board.

II. COMMITTEE ON SOCIAL RESPONSIBILITY POLICY DOCUMENTS

To guide APHA in securing outside support, the Association has developed a number of documents to assist its affiliates and staff.

- 1. Guidelines for Gifts and Donations to APHA
- 2. Principles for Commercial Support or Donations (Appendix I)
- 3. Conditions for APHA Approaching / Seeking Corporate or Foundation Funding (Appendix II)
- 4. Organization Evaluation Tool CSR (Appendix III)
- 5. Background for the Intersectional Council / Council of Affiliates Involvement (Appendix IV)
- 6. Organization Evaluation Tool Affiliates and Staff (Appendix V)
- 7. Research Resources (Appendix VI)
- 8. Guidelines for Gifts and Donations Document History (Appendix VII)
- 9. Evaluation of Donations Rubric (Appendix VIII)
- 10. Manage Your Section Budget: What You Need to Know (Appendix IX)

These documents should be reviewed as part of the overall Committee on Social Responsibility (CSR) process. The history of these documents development is discussed in Appendix VII. In 2006, the Executive Board established the CSR as a permanent committee of the Executive Board. The CSR will

assume all the responsibilities of the "sub-committee" referred to in the 2001 version of these Guidelines.

Updating the process involved in the Guidelines has led to an electronic evaluation tool, which allows for increased sharing of documents and resources among committee members (Appendix III). In addition, a simplified version of the review has been made available to Component leaders to do their own reviews when warranted (see Appendix V).

The overall goal of these evaluation tools is to allow APHA and its components to have a consistent approach to address the concerns for corporate social responsibility when assessing funding sources.

The following considerations must be taken into account when reviewing donations:

- APHA is a non-profit, nonpartisan organization.
- APHA's approaches to donors should be considered as opportunities to build friends and supporters for public health for the long term.
- The criteria for review should be reasonable and realistic.
- The review and oversight process should not be overly cumbersome.
- Over time, the review process will build a body of knowledge for accepting and soliciting gifts and donations.

III. GENERAL ASSUMPTIONS

Three general assumptions shape the acceptance of all donations:

- **1.** APHA will only solicit and accept support for projects and activities that are consistent with the Association's mission and values.
- 2. Acceptance of donations and gifts must enhance, and shall not impede, APHA's ability to act in the best interest of the public at all times.
- **3.** APHA's name, logo and other intangible intellectual assets must be protected at all times.

IV. INITIAL EVALUATION OF DONATIONS

The major determinant in how donations are evaluated is the total amount of the gift or pledge and from whom it is received. The dollar amount will determine the level of review for all donations. In addition, irrespective of the dollar amount of a gift or pledge, if it is a high profile donation from a corporation or corporate foundation which involves Association-wide recognition, such as sponsorship of the APHA Annual Meeting Opening Session, Annual Meeting swag bags, or awards named for corporate donors, CSR review is required and recommendations must be approved by the Executive Board.

Throughout the remainder of this document, the term gift is used to refer to both outright contributions and pledges to be paid over a period of time.

\$100,000 and above

- All donors, particularly those from the corporate sector, making gifts of any amount will comply with all aspects of this updated document.
- The CSR will apply the criteria and procedures described in this document to evaluate the gift or donation.
- Recommendations will be forwarded to the full Executive Board for final approval.

\$25,000 to \$99,999

- All gifts of \$25,000 or more, including gifts received in support of Sections and SPIGs, will be
 reviewed by the CSR for donor adherence to the criteria as stated in these Guidelines. CSR will
 report its findings periodically to the Executive Board.
- To qualify for review, the \$25,000 threshold must be payable in a single year (e.g. If a multiyear pledge averages less than \$25,000 per year CSR review is not required. Conversely, a multiyear pledge which averages \$25,000 or more per year must be reviewed by the CSR.).
- CSR will make the final decisions about donor adherence to these Guidelines on gifts of \$25,000 to \$99,999.
- The Executive Board will be informed of these decisions.

Under \$25.000

- All gifts under \$25,000 will be reviewed for donor adherence to the Guidelines by the Sections, SPIGs, or staff applying the criteria outlined in this document
- This includes unrestricted gifts; gifts made in support of established APHA programs or activities (e.g. gifts made in support of a Section or SPIG); and gifts made in support of new programs or activities in line with APHA's mission and values.

High Profile Gifts

 All gifts for high profile, i.e. Association-wide recognition - regardless of the amount - must be reviewed by the CSR for donor adherence to Guidelines. An example may include the APHA Annual Meeting swag bags.

V. PROCESS FOR REVIEWING A DONATION OR GIFT

Overall, the purpose of the review is to determine the balance of the benefit to the organization in relation to the risks and costs of collaborating with the funding organization.

1. APHA Staff or Component Review

APHA component leaders who are engaged in raising financial resources on behalf of their Section or SPIG are responsible for submitting their respective corporate and corporate foundation prospect list via email to their APHA component staff liaison with a copy to development@apha.org for initial review to ensure that there is no immediate apparent conflict of interests with the Association. In addition, component leaders are responsible for completing and submitting the abbreviated evaluation form to their APHA component staff liaison and copying development@apha.org prior to submitting the funding request.

APHA staff, with ultimate responsibility falling upon the Executive Director (or his or her designate), is responsible for:

- Reviewing gifts under \$25,000;
- Making a final determination on gifts of less than \$25,000;
- Researching the background and affiliations of all donor prospects within reasonable parameters;
- Determining if major APHA policies are relevant to a donation or donor;

- Performing cost/deliverables/funding analysis;
- Completing documentation of the considerations and recommendations/decisions of the sub-committee;
- Completing documentation of the commitments and obligations of each gift;
- Completing periodic reports on outcomes and accountability; and
- Annually compiling and providing to the Executive Board and for public disclosure a list of all donors to APHA, its Sections and SPIGs.

When receiving a donation, APHA staff should first review the donor's status against the Conditions (Appendix I) and the Principles (Appendix II).

It is recommended that a discreet initial assessment by CSR be done as a prospect is identified or is self-identified, as in the case of unsolicited requests to partner with APHA. The assessment will be based on available knowledge (See List of Resources, Appendix VI), including Internet searches, a review of newspapers or other periodicals, professional contacts, outreach to companies/foundations, etc., and contact with appropriate APHA leaders and section officers. APHA members contacted will be held to a level of confidentiality as it relates to discussing APHA's pursuit of potential donors until the information is made public. CSR is encouraged to seek opinions from independent, non-partisan sources as listed in Appendix III.

Staff should then consider the following issues to determine the benefits and risks of accepting the donation.

Note: The following questions should be considered by the Development Committee at the time of the initial interaction with the corporation or corporate foundation involved. These questions can be answered before or after the CSR review, but they are not appropriate concerns for the CSR committee.

Are the specified proposed uses of the donation congruent with the mission and priorities of APHA?

The mission of APHA is to improve the health of the public and achieve equity in health status. Visit the <u>APHA topics and issues page</u> to learn the priority public health issues APHA is focusing on.

Issues to consider:

- 1. How do the proposed uses of the donation relate to APHA's goals and mission?
- 2. Why does the organization want to make a donation to APHA?
- 3. How will the benefits to be derived from the intended purpose of the donation compare with the APHA's resources required to fulfill the intended purpose?

Recognizing that socially responsible practices are a cornerstone of APHA's policies and that good corporate citizenship should embody socially responsible practices, the following are among the types of issues that should be considered in assessing the benefits and the risks of accepting donations from outside organizations and individuals, especially corporations:

a. The types of core products or services produced or provided

- b. Occupational health and safety conditions under which products or services are produced;
- c. Employment practices, including commitment to diversity and a living wage;
- d. Commitment to protection of the environment;
- e. Record of regulatory compliance;
- f. Marketing and advertising practices;
- g. Research and development policy and practices;
- h. Human rights record;
- i. Donor's relevant public policy positions;
- j. Governance practices;
- k. Philanthropic investments;
- 1. Record of support to public health organizations or public health related issues and organizations; and
- m. Other past activities will be weighed in relation to APHA's public policies and public reputation.

Note: APHA will reject funding from any corporation or corporate foundation, if either is engaged in the manufacturing or marketing of alcohol, tobacco and related products; firearms; weapons of warfare; violating international marketing standards of infant formula or other health-related products; or deriving a major portion of its revenues from these activities, nationally or internationally.

In the event that the donor corporation is part of a corporate conglomerate with ties to tobacco, alcohol or the manufacturer of firearms or/or weapons of mass destruction, violates international marketing standards of infant formula or other health-related products, the donation will not be accepted. (Appendix II)

Discomfort with past practices in one or more areas above should not be cause for automatic rejection of the opportunity to put corporate resources to work in APHA's good cause. The appropriate evaluation must be conducted, consistent with the criteria and procedures described in this document.

Does the donation create any real or apparent conflicts of interest? Would the impact and/or benefit of accepting the gift outweigh the risks of partnering with the donor?

Issues to consider:

- 1. Are there any personal, financial, or professional gains for APHA staff, members or other volunteers, which create a conflict of interest?
- 2. What is the impact of the gift and benefits to the public and public health?
- 3. Does the donor's image support or detract from APHA?
- 4. Does the impact and/or benefit outweigh the risks of collaborating with the potential donor?

2. Committee on Social Responsibility Review

Initial reviews of proposed gifts or donations may be conducted by individual committee members, and presented to the CSR (via in person meetings, conference calls, or e-mail) for review, discussion, and decision. In the event that the CSR cannot reach consensus, the majority vote will carry the final decision or recommendation to the Executive Board.

The CSR shall consist of the following members:

- Chair. Appointed by the Executive Board Chair, an elected member of the Executive Board. It is

- recommended that this individual will have served for a minimum of one year on the CSR as a committee member prior to being appointed the committee's Chair.
- Executive Board Members. A minimum of three Executive Board members, appointed by the CSR Chair and the Executive Board Chair. An effort should be made to include one person of each cohort of elected members.
- Non-Executive Board Members. Non-Executive Board members may serve on CSR by representing and identified by constituencies with vested interest in the process (i.e., ISC, CoA and Ethics Section representatives to the CSR). (Term limit: three years)

The CSR will be responsible for:

- 1. Reviewing all gifts of \$25,000 or more for donor adherence to the criteria established in these Guidelines;
- 2. Making the final decision about donor adherence to Guidelines on gifts of \$25,000-\$99,999 and reporting to the full Executive Board the outcomes of those reviews;
- 3. Making recommendations for the Executive Board's consideration on gifts of \$100,000 or greater;
- 4. Reviewing and approving all gifts that provide high-profile, Association-wide recognition;
- 5. Identifying more efficient review procedures and/or gaps in the process;
- 6. Proposing to the Executive Board modification to the Guidelines; and
- 7. Offering guidance to Components and Affiliates in support of their review activities.

Note: In order for the review process to support the resource development effort, it may be necessary to initiate the process before final gift negotiations are complete. In such cases, the CSR will be asked to make a recommendation based on the available information and to apply the decision to expedite a final recommendation as negotiations are completed.

3. Executive Board Role

The full Executive Board will receive the report of the CSR for gifts of \$25,000 to \$99,999 and consider the committee's recommendations in making a final decision on all gifts \$100,000 and greater. In the event the Executive Board cannot reach consensus, the majority vote will carry the final decision.

The Executive Board will make final recommendations on proposed modifications to the Guidelines based on the CSR's recommendations.

The Executive Board will provide an annual report to the Governing Council detailing funding decisions and modifications of the Guidelines.

VI. Other Issues to Consider

Turnaround Time

It is essential that the turnaround time for review be sufficient to allow time for staff to prepare materials for the CSR and for conference calls to be conducted. At the same time, it will be imperative that the review process be completed efficiently and promptly. It is recommended that this process be completed within a two-month time frame.

Should a donor require a faster decision on the acceptance of a gift (for example, an offer made late in the year that requires acceptance for tax purposes), the Executive Director shall have the authority to discuss the gift with the chair of the CSR and make a binding decision for the organization. If the CSR chair is unavailable, the Executive Director shall have the sole authority to act in the best interest of APHA according to these Guidelines.

Documentation

All CSR reviews of donation opportunities must be documented. Documentation of difficult decisions, particularly those in which consensus was not reached, should be detailed.

Staff must prepare statements for the donor and the CSR Annual Report to the Executive Board on Gifts and Donations on the agreed-to use of the funds and accountability to reporting outcome for both restricted and unrestricted gifts. A general, positive statement is recommended for unrestricted gifts, for example: "APHA will put the funds to use for the betterment of public health and to further our mission. APHA also agrees to provide periodic updates to the donor describing how the funds are used."

Staff should complete statements for the donor and the CSR Annual Report to the Executive Board on Gifts and Donations on gifts that do not require formal review, for example: "APHA received \$\$ from X Foundation for Y, Z activities; this is in keeping with APHA's donation policies."

Criteria and Mechanism for Expedited Reviews

Gifts of \$100,000 and less, from non-controversial prospects, in support of approved or established projects, and in which there are no extraordinary obligations or stipulations can be expedited. In these circumstances, review materials may be e-mailed to all members of the CSR with a short deadline. Affirmative responses from at least three of the elected EB members of the CSR are required before accepting the gift.

An example of a non-controversial prospect may include gifts from APHA members.

Multi-year Gifts

Multi-year gifts that on an annual dollar-amount basis reach the level required for CSR review are to be evaluated by the CSR on an annual basis to ensure that the criteria continue to be met. In particular, this review should determine whether the risk/benefit analysis warrants the continuation of the relationship. The review process should be documented.

An example of an evaluation process that may be completed due to a multi-year gift is one whereby

the evaluator is provided the prior completed CSR review as a reference and the abbreviated evaluation template to complete including a search on https://news.google.com paying specific attention to the following areas: (1) environment, (2) social, (3) employees/customers, (4) governance, (5) product development or marketing issue ,etc. that may diminish the APHA brand or be in conflict with the APHA mission with a recommendation to the committee to maintain or remove CSR approval of the organization.

Any changes in the CSR's evaluation of the donation will be forwarded to the Executive Board for consideration, final recommendation, and inclusion in the annual report to the Governing Council. The Governing Council does not need to approve this policy.

Donations to Sections and Special Primary Interest Groups (SPIGs)

All donations to Sections and SPIGs should be reviewed using the special shortened review tool prepared by the Committee on Social Responsibility for use by its members (Appendix V). Donations in the amount of \$25,000 or more, need CSR review.

Donations to Affiliates

The concepts embedded in this document should be of value to APHA's affiliated state public health associations. The affiliates, as independent 501(c)(3) organizations, are not bound by this document; however, if an affiliate seeks funds for an APHA activity (i.e., CoA Scholarships and Awards Reception at the APHA Annual Meeting) or in conjunction with APHA, these policies will be applicable (and does not apply to an affiliate seeking funding for its own annual meeting). The Affiliates should adopt APHA's Principles of Support from Corporations (Appendix 1) and adapt it to their needs.

Donations to Third Parties

Donations received by a third party for an APHA activity or an activity that is associated with or publicized as an APHA function must conform with APHA's Principles for Commercial Support and the Guidelines for Gifts and Donations. APHA or the APHA constituent group involved with the donation or activity must inform APHA staff of the original source of the donation, its intended use and how the donation will be promoted. If the donation is above the \$25,000 level, the review will be conducted by the CSR.



APPENDIX I

Principles for Commercial Support or Donations

Approved by the Governing Council - November 1999 Modified by Governing Council Motion - October 2001

APHA will focus on purposes consistent with its strategic priorities and comply with the following "Principles for Commercial Support or Donations" in soliciting all gifts. These Principles will be discussed with all donors during the early stages of discussions.

Principles for Commercial Support or Donations

- 1. APHA will at all times maintain an independent position on public health issues and concerns.
- 2. APHA will solicit and accept support only for projects and activities that are consistent with the Association's Mission.
- 3. APHA will accept funds for informational and educational activities only when the content is to be determined by APHA or an independent body of public health professionals designated by APHA.
- 4. APHA will maintain complete control of all funds provided from commercial supporters for educational activities.
- 5. APHA will not permit product promotions as part of a Continuing Education activity.
- 6. It is the policy of APHA not to provide product endorsements.
- 7. Acknowledgments for commercial support will be limited to company name, logos or slogans which are an "established part of the supporter's identity," trade names, addresses and telephone numbers. APHA will not permit the use of corporate names in naming APHA awards. (Added as a result of 2001 Governing Council motion).
- 8. APHA's intangible intellectual assets, including the Association's name and logo, will be protected at all times. Donors will not be permitted to use APHA's name or logo for any commercial purpose or in connection with the promotion of any product.
- 9. APHA will be vigilant at all times to avoid any real or apparent conflict of interest in accepting donations.

Any situation that may be an exception to these Principles will be reviewed by the Executive Committee of the Board. The Executive Committee will determine the final course of action.



APPENDIX II

Committee on Social Responsibility (CSR) Conditions for APHA Approaching/Seeking Corporate or Corporate Foundation Funding

- 1. APHA will reject funding from any corporation or corporate foundation, if either is engaged in the manufacturing or marketing of alcohol, tobacco and related products; firearms; weapons of warfare; violating international marketing standards of infant formula or other health-related products; or deriving a major portion of its revenues from these activities, nationally or internationally.
- 2. APHA should seek funding from any corporation (or its foundation) if either bears a mission or values which is/are determined to complement or wholly align with those of the APHA.
- 3. APHA should refer any potential or existing corporate or corporate foundation funding source viewed as unclear (i.e., in a "gray area") with regard to meeting points one and two above to the CSR for further discussion. If APHA chooses to continue, then the prospective funder will need to go through the full CSR evaluation process.
- 4. For corporations which may not be acceptable for donations, the existence of separate foundations does not make such funding acceptable. APHA should recognize that the relationship between a corporation and its foundation may constitute a source of conflict with regard to funds being sought from the foundation, if their Board of Directors or policies are too closely linked. If members comprising a corporation's Board constitute a controlling interest of its foundation's Board or if the foundation's Board is unduly influenced by its corporation's Board, such may result in a conflict of interest with regard to the mission and values of APHA. In such situations or when a lack of clarity appears, APHA members should refer the potential funding source (corporation or its foundation) to CSR staff liaison to consider next steps, which might include full CSR evaluation process before engaging in any significant discussions with such corporation or foundation.
- 5. APHA recognizes that a corporation's decisions or practices may occasionally not meet 100% of the high ethical standards sought by the Association. Should a corporation or foundation be found to have violated a critical APHA value (e.g., human rights, social justice, environmental degradation, self-respect/individual liberty), and have accepted the responsibility, provided due compensation when and wherever possible, and committed to avoid any continuation of the egregious practice/violation, APHA may choose to submit the corporation or foundation to the CSR to undergo its full evaluation process before engaging in any significant discussions with such corporation or foundation. Such determinations shall be made by the CSR on a case-by-case basis. No exceptions for seeking funding or CSR evaluation shall be considered with regard to any corporation or foundation associated with the products or activities listed in #1 above.
- 6. If a corporation or a corporate foundation has been reviewed more than 5 years ago and now becomes viewed as a possible source of a new grant, it should be re-reviewed (given possible changes in the past 5



years) by CSR. If in the past, a potential funding source did not receive a positive CSR review, the CSR may consider rereviewing it if necessary.

APPENDIX III

APHA CSR Evaluation Tool

The CSR Evaluation Tool is a separate Excel file and available to review upon request.



APPENDIX IV

Background for the ISC/COA Involvement With the Committee on Social Responsibility June 2017

Since 2014, the Committee on Social Responsibility (CSR) of the American Public Health Association (APHA) has worked closely with its component groups, the Intersectional Council (ISC) and the Council of Affiliates (CoA) to improve understanding of the CSR mission and communication on how donor organizations are evaluated and approved. As part of that effort, members of the CSR committee have met with the two groups, independently and together by phone and in person at the midyear meetings. In response to what was heard at these focus group sessions, CSR developed a shortened tool for use by Component and Affiliate members to assist in their own evaluation of potential donors. At the 2017 ISC-CoA mid-year meeting, the new tool was introduced and piloted by those in attendance.

The overall reason for this effort is to improve donor evaluation and to make the overall evaluation more transparent. The goal is to assist APHA and its Components to have a consistent approach to address the concerns for corporate social responsibility. CSR only evaluates donors of \$25,000 or more. The CSR processes and tools are intended to provide guidance, and it is expected that APHA and its Components will exercise the expected moral and ethical prudence. For example, it would not be appropriate for a donor who could potentially donate \$25,000 or more but that fails CSR's evaluation to donate a lesser amount to other Components of the broader APHA organization because such review is not in place.

While consistency has its ramifications, the goals of the CSR process require such diligence in detail. Working with potential donors to clarify issues of concern is part of the CSR/development process which requires more clarification as the procedures develop.



APPENDIX V

APHA/Committee on Social Responsibility Organization Evaluation Tool – Component and Affiliate Leaders and APHA Staff

To help integrate the mission of the Committee on Social Responsibility throughout the American Public Health Association, CSR created a brief evaluation tool for APHA Component and Affiliate leaders who are fundraising. The tool identifies criteria by which leaders can make informed decisions about accepting funding from a corporation/corporate foundation.

The goal is to minimize or eliminate real or perceived conflicts of interest and duplication of effort. The intent is to make this process realistic and as simple as possible. This tool provides clear and consistent criteria so that two people reviewing a given entity would come to the same decision. Leaders who are raising funds for APHA Components should read and follow the *APHA Guidelines for Gifts and Donations* ("The Guidelines"). The Guidelines apply to *corporations and corporate foundations only*; entities that do not require such evaluation include government funders, independent foundations and academic institutions.

Procedure for ISC and CoA:

ISC and CoA leaders can use this tool to evaluate corporations/corporate foundations, and then provide the evaluation information to the appropriate APHA staff for each group. By answering the questions in the checklist, the leader should be able to determine if the potential donor enhances the APHA stance on corporate social responsibility. Depending on the amount of funds involved, the individual leader and his/her Component can make the determination and proceed. This information should be forwarded to the appropriate APHA staff for ISC and CoA.

Information about the organizations evaluated as well as a comprehensive list of organizations they considered will be shared with the CSR staff liaison, as well as vice versa, to avoid duplication of effort. The purpose of the APHA staff liaison review is to improve communication among the various Components *and Affiliates* of APHA. In addition, per the Guidelines, development staff are responsible for approving donors of gifts and donations to APHA that do not exceed \$24,999 per year; CSR is responsible for approving donors of gifts and donations to APHA of \$25,000 or more in a given year.

Please submit all completed evaluations to the CSR staff liaison at development@apha.org. Please note: APHA has a list of CSR-approved organizations. Please contact development@apha.org for info on organizations already reviewed to save yourself some time and energy.

Additional Information for Affiliates:

This tool can provide useful guidance for Affiliates in their development work. While not required, it will be very helpful for Affiliates to be in touch with Development staff at APHA, especially when considering a corporation/corporate foundation that reaches beyond the state or region. If a corporation/corporate foundation has already been reviewed, Development staff can save the Affiliate valuable time. In addition, coordinating such funding through the Development Department will prevent the confusion of multiple entities approaching the same sources for funding.

Questions?

Contact the CSR staff liaison at 202-777-2486 or development@apha.org.

Organization Evaluation Tool - Component and Affiliate Leaders and APHA Staff

Reminder: APHA will reject funding from any corporation or corporate foundation, if either is engaged in the manufacturing or marketing of alcohol, tobacco and related products; firearms; weapons of warfare; violating international marketing standards of infant formula or other health-related products; or deriving a major portion of its revenues from these activities, nationally or internationally

Company:			
Corporate Foundation:			
Report Prepared by:			
Date:			
Relevant Questions	Responses/ Comments		
Has the corporation or corporate foundation	□ Yes		
expressed interest in funding APHA, an APHA	Anticipated Amount of Funding \$		
component or an APHA Affiliate?	Intended Area of Interest		
	□No		
	□ Unknown		
	onent or Affiliate		
Contacted APHA Development Staff to find out if	☐ Yes (circle one: not evaluated, not approved)		
this corporation/corporate foundation has a prior	□ No		
CSR review and its outcome?	□ Unknown		
Alerted APHA Development Staff that the	□ Yes		
Component or Affiliate is considering pursuing	□ No		
funding from this corporation/corporate			
foundation?			
Researched the corporation/corporate foundation	□ Yes		
(see previous page)?	□ No		
Is there any real or perceived conflict of interest	☐ Yes Comments:		
for this corporation/corporate foundation in their	□ No		
public presentation?	□ Unknown		
Does the corporation/corporate foundation	□ Yes Comments:		
demonstrate a strong linkage to public health in	□ No		
general, and have similar values to APHA?	□ Unknown		
Does this entity support and enhance the APHA	☐ Yes Comments:		
policy stance?	□ No		
	□ Unknown		
	E Chimown		
Evaluator's Recommendation	Circle One:		
1 – Okay to pursue funding			
2 – Not okay to pursue funding	1 2 3		
3 – Request CSR guidance (please submit			
completed evaluation and noted area of concern			
to CSR staff liaison at development@apha.org)			



APPENDIX VI

Research Resources

Resources for collecting relevant information on the company and corporate foundation

- Websites including but not limited to:
 - o https://news.google.com/
 - Scan "top stories" noting anything that may be in conflict with APHA mission, vision and values.
- Corporate/foundation website (recognizing the inherent positive spin found there). Pay specific attention to the following areas:
 - Environment (How does this corporation/foundation demonstrate a positive policy or value toward the environment? What real or potential environmental threats are posed by this group?)
 - o **Social** (customers, human rights and community, labor rights and supply chain)
 - **Employee/Customers** (Does the corporation/foundation have a positive history/policy toward employees, customers? Are there notable infractions on labor issues or use of resources?)
 - o **Governance** (Is the governance of the foundation independent of the parent corporation? Any history of governance problems or infractions?)
 - Any history of regulatory issues related to product development or marketing?
 - Corporate/foundation public policy positions:
 - Relevant public policy positions
 - Do they support APHA policy stance?
 - Progressive policies (e.g., climate change, gun violence prevention, LGBTQ rights, health as a right)
 - Any significant policy issues
- Corporate/foundation social media accounts (Facebook, Twitter, Instagram, LinkedIn, etc.)
- www.wikipedia.com

Note: Wikipedia often provides useful background information and links but should NOT be a primary source for evaluation. We want to be sure decisions are evidence-based and credible.

The research sources listed below should be used to support the information presented in Appendix V.

- 1. Calvert Responsibility Index: https://www.calvert.com/calvert-responsible-indexes.php
- 2. Corporate Social Brief: http://www.socialfunds.com/csb/disclaimer.cgi?redirect=index.cgi
- 3. Progressive Asset Management: http://www.progressiveassetmanagement.com

4. Interfaith Center on Corporate Responsibility:

http://www.iccr.org

5. Council on Economic Priorities:

http://www.sourcewatch.org/index.php/Council_on_Economic_Priorities

6. Occupational Safety and Health Administration:

https://www.osha.gov

7. Lexis Nexis:

https://www.lexisnexis.com

8. CourtLink (listing of federal litigation):

https://www.lexisnexis.com/en-us/products/courtlink-for-corporate-or-professionals.page

9. Public recognition received, as stated in independent press releases or listings of best practices, for employment practices and environmental awareness

10. D&B Hoovers:

http://www.hoovers.com

11. Directory of Corporate Affiliations

- 12. Top Business Directory, The Global Directory of Who's Who
- 13. Taft Corporate Giving Directory

14. Philanthropy News Digest:

http://philanthropynewsdigest.org

15. Foundation Center:

http://foundationcenter.org

16. Company citizenship reports, community involvement reports, and corporate press releases

17. Websites specifically about foundations including, but not limited to:

www.charitynavigator.org

www.foundationcenter.org/findfunders/990finder

www.guidestar.org

www.bbb.org/us/charity

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For science. For action. For health.

APPENDIX VI

Guidelines for Gifts and Donations Document History

This document is an adaption of the previous Guideline for Gifts and Donations, which addressed both issues of corporate oversight and the logistics of fundraising.

Updates & Approvals

November 2000: Approved by the Governing Council October 2001: Approved by Executive Board

November 3, 2006: Updated at the Executive Board meeting Updated at the Executive Board meeting Updated at the Executive Board meeting Updated at the Executive Board meeting

June 6, 2011: Updated by CSR Chair, Development Chair, and Executive Director

Fall 2017: Updated by CSR, Executive Director, and Executive Board Nov. 2018: Updated by CSR and shared with the Executive Board

Brief History of the Committee on Social Responsibility Policy Documents

To guide APHA in securing outside support, the Association initially developed the "Principles of Commercial Support" (Appendix I). The Principles are intended to guide APHA's collaboration with the private sector. The Principles were approved by the APHA Governing Council at its Annual Meeting in November of 1999. These principles were updated and streamlined by the Committee on Social Responsibility (CSR) during 2018.

To strengthen implementation of the original Principles, the "Guidelines for Gifts and Donations to APHA" (Guidelines) were developed. These Guidelines describe specific criteria and a review process for evaluating potential donors and gifts. The same Guidelines covered the actual logistics of how these donations should be made. The Guidelines, in conjunction with the Principles, were initially intended to protect the mission and integrity of APHA while supporting the Association's fundraising efforts. In 2016, the CSR undertook a comprehensive review of both documents, and updated both the processes and criteria.

The development of the new strategic plan in 2013 emphasized the need to broaden the "public health tent" to include new and different players. This inclusive effort questions some of the initial set of criteria, which were based on some level of exclusivity. Without compromising the intent of the original Principles or Guidelines themselves, this review of the guidelines and update has been undertaken by the Committee on Social Responsibility as a whole.

The original Guidelines were reassessed after one year and thereafter as necessary. This evaluation and revision is part of this ongoing review. Such reassessments take into consideration the CSR committee's experience in using these Guidelines. Initially, it was expected that methods for a more effective review and/or gaps in the criteria or the review process would be identified, which has occurred. As a result, modifications made to the Guidelines in this version are appropriate at this time. The 2018 review represents the eighth review since 1999.



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APPENDIX VIII Evaluation of Donations Rubric

General Assumptions:

- 1. APHA will only solicit and accept support for projects and activities that are consistent with the Association's mission and values.
- 2. Acceptance of donations and gifts must enhance, and shall not impede, APHA's ability to act in the best interest of the public at all times.
- 3. APHA's name, logo, and other intangible intellectual assets must be protected at all times.

	Donation Amount			
	Up to \$24,999	\$25,000 to \$99,999	Over \$100,000	
Reviewing Agency	Components (i.e., Sections and SPIGs), CoA/Affiliates and APHA Staff	CSR	CSR and Executive Board	
Document Needed	Appendix V	Appendix III	Appendix III	
Notes	Includes unrestricted gifts, gifts made in support of established APHA programs or activities (e.g. specific Section or SPIG), gifts made in support of new programs or activities. May include multi-year pledges averaging less than \$25,000 per year.	CSR will report findings periodically to the Executive Board. \$25,000 threshold must be payable in a single year (multi-year pledges averaging \$25,000 or more per year).	CSR will complete initial review, then forward the recommendation to the full Executive Board.	
Final Decision Maker	APHA Staff	CSR	Executive Board	
Other Gifts				
High Profile Gifts	All gifts for high profile, Association-wide recognition (e.g., sponsorship of the Annual Meeting Opening Session, Annual Meeting swag bags, etc.) must be reviewed by the CSR – regardless of the amount – for donor adherence to the Guidelines.			
Foreign Gifts	Transactions from foreign entities must be reviewed in the same fashion as any other transaction as pertains to monetary amounts, however rigorous research must be done to determine <i>why</i> this foreign entity is contributing monies to the APHA.			
Anonymous Gifts / Quam Imperium (beyond control)	A truly anonymous donation (liquidated assets, cash contributions for unrestricted use) may be from a source from whom APHA would not otherwise accept donations. This is beyond the purview of APHA to investigate			