



FOUNDATION FOR  
**COMMUNITY  
HEALTH**

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**Policy on Transparency & Confidentiality**  
**For Directors, Employees and Volunteers of Foundation for Community Health**

***Transparency***

Recognizing the importance of its role as a steward of public funds, The Foundation for Community Health is committed to the concept of transparency in regard to its administrative and financial operations. To that end, the Foundation has established an open dialogue with the members of the community it serves via its interactive website, its public comment line, and through a variety of community outreach methods. The Foundation's financial information will also be available through both an annual report and through the required annual tax reporting on Form 990 filed with the federal and state governments. Grant making policies and procedures will be clear and uniform for all applicants, as will the process for receiving, reviewing and acting on grant applications.

***Confidentiality***

While committed to the practice of transparency as described above, it is also true that the Foundation's role as a funder, leader, convener and decision-maker in the community results in the acquisition of extensive information that is considered confidential and/or privileged. Much information is shared with the Foundation because of its reputation for trust and its ability to make fair decisions. To safeguard the Foundation's integrity as a responsible decision-maker and to protect its capacity to gather data necessary to make those decisions, the Foundation subscribes to specific policies on confidentiality.

**Policy**

Foundation Board members, Committee members and employees should not engage in private discussion of Foundation matters (except when engaged in the business of the Foundation). Specifically:

- The positions or statements of individual Board and Committee members should not be discussed outside of official Foundation meetings and internal processes.
- Content of Foundation business that contains confidential/privileged information, including documents or Foundation analysis of documents, should not be discussed or shared outside official meetings and internal processes.

I agree to comply with the Foundation for Community Health's Transparency & Confidentiality Policy as outlined above.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

## **The Foundation for Community Health Conflict of Interest Policy and Statement**

Conflict of Interest principles are important to prevent members of the Board of Directors of The Foundation for Community Health (the Foundation) and any member of one of its committees having Board-delegated powers or any of its employees from taking actions to benefit themselves, others related to them as defined in Section 6.4 of the By-Laws\*, or other organizations with which they are affiliated, which reads:

*Interested Directors. The Board of Directors and the Corporation's officers shall operate in accordance with a conflict-of-interest policy and in accordance with the provisions of the Act. All directors and officers of the Corporation shall complete annually a disclosure statement that describes the material facts concerning any transaction or arrangement that could reasonably give rise to a conflict of interest. If, after submitting an annual disclosure statement, an apparent or potential conflict arises within the spirit of the Corporation's policy or under the Act, the director or officer shall immediately disclose the situation (whether or not specifically addressed herein) to the Board of Directors.*

The conflict-of-interest principles also apply in ways which arguably transcend the traditional notion of conflict of interest whenever there is or could be an appearance of a conflict of interest. Many Board and Committee Members and employees may have a duality or diversity of interest not involving personal or pecuniary advantage to the individual Board or Committee Member or employee but rather the interest of another non-profit organization which has or may seek to have dealings with or seek to receive grants from the Foundation.

It is the policy of the Foundation not to enter into any contract, transaction or other arrangement with an outside concern or venture in which a Board or Committee Member or an employee or others related to him or her who is in a position to influence Foundation decisions has a financial or personal interest unless such interest and its relation to the terms of such contract, transaction or other arrangement are fully disclosed to the Board by the relevant Board or Committee Member or employee. Each director, officer, and key employee must complete an annual disclosure form and update it as circumstances change.

Any potential conflict must be disclosed promptly to the Chair and CEO before the related matter is discussed. The individual must recuse themselves from discussion and vote; this recusal must be recorded in the minutes. Minutes shall reflect (1) the name of the person with the conflict, (2) the nature of the conflict, (3) actions taken to determine fairness, and (4) the Board's decision.

In the case that there is some confusion or doubt regarding a transaction or relationship, the non-conflicted members of the Board of Directors shall determine

whether the transaction or relationship is fair, reasonable and in the best interest of the Foundation.

The Executive Committee will regularly review disclosed and potential Conflict of Interests and member shall be reminded regularly that they can up date this form at any time should potential conflicts arise.

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I have read this Conflict-of-Interest Statement. I understand that any violation of this policy may result in my removal from the Board or any Committee of the Foundation or from my position of employment by the Foundation.

To the best of my knowledge and belief, neither I nor any person related to me is engaged in any transaction or activity nor has any relationship, which may represent a potential conflict of interest as described therein, except for the organizational affiliations for myself and for those persons related to me listed below.

**For-profit Organizations**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Non-profit Organizations**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Agreed to and signed: \_\_\_\_\_

\_\_\_\_\_

(please print name)

This \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_\_\_.

**FOUNDATION FOR COMMUNITY HEALTH**  
**WHISTLEBLOWER POLICY**  
**REPORTING SUSPECTED VIOLATIONS OF LAW AND POLICY**

**Purpose**

To provide a mechanism for employees to raise good faith concerns regarding suspected violations of the law on the part of the FCH, to cooperate in an inquiry or investigation by a court, agency, law enforcement, or other governmental body, or to identify potential violations of FCH policy; and to protect employees who take such action from retaliation.

**Policy**

The Foundation for Community Health is committed to maintaining a workplace where employees, officers, directors, consultants, grantees, and volunteers, are free to raise good faith concerns regarding the FCH's business practices, specifically: (1) reporting suspected violations of law on the part of the FCH, including but not limited to federal laws and regulations; (2) providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and (3) identifying potential concerns involving misuse of funds, accounting irregularities, fraud, harassment, or violations any explicit FCH policy.

An employee who wishes to report a suspected violation of law or FCH policy may do so confidentially by contacting his or her immediate supervisor, the CEO, or Chair of the Board. The complaint can also be made anonymously in writing (including email) to those identified above. In the case of email, it is suggested that the complainant create a unique email designated for this correspondence alone. Complaints involving the CEO, must be directed to the Chair of the Board. The Board shall notify the CEO in writing within 30 days of receiving the complaint.

The FCH expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees who raise suspected violations of law, cooperate in inquiries or investigations, or identify potential violations of FCH's policies. Any employee who engages in retaliation will be subject to discipline, up to and including termination.

Any employee who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report the retaliation to his or her immediate supervisor, the CEO, or the Chair of the Board if the report is filed against the CEO.

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The CEO, or the Chair of the Board will initiate the

investigation within 15 days of receipt of the complaint, and at which time the Executive Committee will also be notified of the complaint. The CEO or the Chair of the Board will conduct or designate other internal or external parties to conduct the investigation. Every reasonable attempt will be made to complete the investigation within 60 days of its initiation. The investigating parties will notify the concerned individuals of their findings directly or indirectly where appropriate and prepare other reports as indicated by the circumstances. A summary of all such reports will be presented to the Executive Committee of the Board within 15 days of completion of the investigation. After which, the Executive Committee shall review this summary and act on it where necessary within 30 days.

It should be noted that all such reports must be made in good faith; knowingly false or malicious reports may result in disciplinary action.

## Foundation for Community Health Spending Policy

The Spending Policy is designed to maintain the long-term purchasing power of FCH’s Endowment Assets, net of inflation, while also providing a steady and predictable level of funding for program support. It requires FCH to determine an annual Spending Rate, which is based on the expected annual investment portfolio returns (net of management fees) over the next 5 to 10 years minus an estimate of the annual change in the CPI over the same time-frame.

The Endowed Funds subject to donor-restrictions will be managed in accordance with the Uniform Prudent Management Institutional Funds Act (UPMIFA) and thus the following additional provisions are considered when determining the spending rate:

1. The duration and preservation of any endowment funds
2. The purposes of the institution and the endowment funds
3. General economic conditions
4. The possible effect of inflation or deflation
5. The expected total return from income and appreciation of assets
6. Other resources of the institution
7. Where appropriate and circumstances would warrant, alternatives to expenditure of the endowment fund, giving due consideration to the effect that such alternatives may have on the institution
8. The investment policy of the institution

### Foundation for Community Health Spending Policy Change Log

<b>Fiscal Year</b>	<b>Spending Rate</b>	<b>Board Approval Date</b>	<b>Comments/Rationale</b>
2019	4.25	Sept 11, 2018	This spending rate was only applied to the FCH funds invested with BTCF (which was the policy for all years prior to 2019). The income from the two trusts were treated as income and the DAF funds were used sparingly on small grants.
2020	4.25%	Sept. 9, 2019	Adopted the current Spending Policy calculation to include all assets from which FCH can draw upon.

			Added \$100,000 to grant budget in response to COVID pandemic at May 4, 2020, Board Meeting
2021	5.00%	Sept. 14,2020	Increased to 5.0% in recognition of the increased need to support non-profits and basic needs of those they serve.
2022	5.00%	Sept. 13, 2021	Recommendation was based on continued impact of COVID on non-profits and the communities they serve.
2023	5.00%	Sept. 12, 2022	Recommendation was based on the fact that many of our grantees will need support to counteract the effects of inflations, the downward trend of the markets and some of the long-lasting negative impacts of COVID on their organizations and the people they serve.
2024	4.75% 4.85%	Nov. 6, 2023 Dec. 4, 2023	The FY2024 rate, applied to FCH Endowed Assets and other assets, was changed from 4.75% to 4.85% by Board during Budget discussions at December meeting.
2025	4.85% 5.0% 5.72% Budget Calculation rate which resulted in: <ul style="list-style-type: none"> <li>• 5.0% endowed funds</li> <li>• 5.8582% two unrestricted funds</li> </ul>	Sept. 9, 2024 Dec 2, 2024 Mar. 3, 2025 (5.72% Was used in Budget calculation)	The FY 2025 rate applied to FCH Endowed Funds was changed twice by Board. First, during Budget discussions at December 2024. At the March 2025 meeting, the Budget calculation rate was changed from 5% to 5.72% which resulted in maintaining the 5% for the endowed funds and most others, but an increase in two of the larger unrestricted funds.
2026	6.5% Budget Calculation rate which resulted in a 7.565% rate for all FCH funds	November 3, 2025	The 6.5% Spend rate used in our Annual Budget process translates to an actual rate of 7.565% rate when applied to all (including the endowed) funds.

## **FOUNDATION FOR COMMUNITY HEALTH**

### **FUNDING RESTRICTIONS FOR FAITH-BASED ORGANIZATIONS**

The Foundation for Community Health will not fund faith-based organizations or institutions for activities and/or programs of religious teaching or training such as religious services or bible study. However, the Foundation will consider grants for community-based service programs that meet certain criteria, including the following: services must be available to all regardless of their religion or belief in God and must not be rooted in a particular religious doctrine or belief system; there is a formal structure for provision of services (e.g. mission, staff, program policies and procedure); services go beyond religious charitable work to include activities that make a real impact on the lives of people living in their communities; and the organization agrees to abide by the Foundation for Community Health's policy on nondiscrimination.