



Policy on Advocacy Framework

Community foundations are able to undertake policy advocacy like other 501(c)3 nonprofits, and have less restrictive ¹Internal Revenue Service (IRS) regulations than private foundations.

As permitted by the IRS, Inland Empire Community Foundation (IECF) has the ability to advocate directly to decision makers, fund lobbying activities, and undertake other forms of policy education and advocacy to further its mission, vision, and values. The extent of lobbying that the Foundation can undertake is subject to the limits imposed by the IRS 501h expenditure test.

Criteria for Undertaking Policy Advocacy

The following criteria will determine whether to engage in a policy and advocacy issue:

- The policy relates directly to current grant making, program initiatives or other broad strategy areas identified by the Board of Directors (Board). Issue areas would include:
 - Equity
 - Education
 - Environment
 - Inclusive Economic Development
- Significant portions of IECF's constituencies or partners would be impacted by the resulting policy, especially nonprofits;
- Issues are proposed by the League of California Community Foundations or other well-respected associations in which IECF is a member;
- The issue directly impacts the community foundation business model and requires IECF to provide its perspective.

Process for Undertaking Policy

Consistent with the outlined criteria, and as a staple of policy advocacy, the Board recognizes the need for IECF to build coalitions around identified policy priorities. This authority will allow IECF to engage with traditional and non-traditional identities for the purpose of building cross-collaboration while effectively informing IECF's annual policy agenda. Coalitions would include, but not be limited to: government, community based organizations, and advocacy groups.

Operating on a non-partisan basis, the Chief Executive Officer (CEO) and Director of Policy & Governmental Affairs (Director) will bring recommended public policy advocacy positions forward to the

¹ For more information, please refer to the companion materials found on, <https://bolderadvocacy.org/resource/public-foundations-and-advocacy/>, by the Alliance for Justice's Bolder Advocacy campaign.



Public Policy & Advocacy Committee (Committee) for vetting and discussion. The CEO and Director are responsible for bringing any needed information and recommendations about a policy to the committee, and to provide materials to the Board in the form of a written report. The Committee will have the authority to:

- 1) Approve or deny the request for action and notify the Board at the next regular Board meeting of the Committee's decision;
- 2) Advance a public policy advocacy issue to the full Board for discussion and decision.

When deferred to it, the Board as a whole will discuss the policy advocacy item and decide one of the following options:

- 1) Support or oppose;
- 2) Take no position;
- 3) Request staff and Committee to undertake more research and deliberation and either:
 - a. Decide at the Committee level, or;
 - b. Return the issue to the Board for a final decision.

Where the Board has previously approved policy advocacy positions, the CEO and Director will have the authority to act consistently with previously approved public policy directives from the Board and report on those actions to the Committee.

Potential Actions for Policy Advocacy

The following are potential actions for policy advocacy issues. By agreeing to this framework, the Board accepts that these are appropriate actions for IECF to take, in discussion with the Committee:

- Sponsoring and/or Co-Sponsoring legislation
- Written position letters on measures, legislation and budget items;
- Signing on to other position letters;
- Meeting and engaging with elected officials or other officials on relevant issues;
- Allowing IECF's position to be listed on websites and/or materials;
- Convening stakeholders for discussion and debate;
- Issuing a call to action to partners and stakeholders;
- Sharing our action with our donors and nonprofit partners through communications when appropriate;
- Communicating our actions or ideas through op-eds or other media;
- Engaging Board members as advocates.

The Committee, CEO, and Director will collaboratively produce an annual report for the final Board meeting of the year in order to highlight the efforts and progress of IECF's policy advocacy.