



**COMMUNITY  
FOUNDATION**  
*of Northern Nevada*

## **COMMUNITY FOUNDATION OF NORTHERN NEVADA ADVOCACY POLICY**

### **I. Purpose**

The Community Foundation of Northern Nevada (“Community Foundation”) strengthens our community through philanthropy and leadership. The Community Foundation frequently receives requests for letters of support or requests for collaboration. The Community Foundation also identifies opportunities to improve the community through efforts that involve advocacy on behalf of a particular issue. As the Community Foundation grows and expands relationships, financial resources, and community leadership activities, the opportunity and need for advocacy as a part of our efforts to improve the quality of life for residents in northern Nevada has grown.

The purpose of this policy is to define advocacy, identify types of advocacy activities, and guide the Community Foundation’s staff and Board of Trustees as to when — and to what extent — they can advocate on behalf of the Community Foundation and when approval from the Community Foundation’s Board of Trustees is required.

### **II. Definitions**

- **Advocacy:** An umbrella term for all types of engagement with policymakers (including elected and appointed officials and their staff) that is not specifically considered lobbying under the IRS definition. For the purposes of this policy, advocacy also includes engagement with opinion leaders, organizations, agencies, and coalitions.
- **Lobbying:** Any activity that attempts to influence or express a view about specific legislation or public policy.
  - **Direct lobbying:** The attempt to influence specific legislation or public policy by expressing a view on that legislation via direct communication with an elected official or any other government official or employee who is involved in the policymaking process.
  - **Grassroots lobbying:** The attempt to influence specific legislation or public policy via communication with any segment of the general population, where that communication encourages the recipient to act with respect to that legislation.

### **III. Extent of Community Foundation Lobbying**

The Community Foundation may lobby to the extent they can under the 501(h) Expenditure Test. If the Community Foundation pays for lobbying, the Community Foundation must complete IRS Form 5768 and any other necessary documentation.

#### **IV. Community Foundation Compliance Officer**

The Community Foundation's President & Chief Executive Officer will serve as the Compliance Officer ("Compliance Officer"), who will always remain familiar with IRS rules and regulations regarding limits on the political activity of organizations exempt from federal income tax under Section 501(c)(3).

The Compliance Officer will address Community Foundation staff and members of the Board of Trustees to periodically review the IRS rules and regulations governing political activities of Section 501(c)(3) organizations and to answer any questions regarding specific Community Foundation activities or programs that may implicate such rules.

#### **V. Activities Community Foundation Staff May Undertake Without Board of Trustees Approval**

This section outlines the advocacy activities that Community Foundation staff may conduct without requiring approval from the Community Foundation Board of Trustees. Any questions staff have about an advocacy activity listed below are to be directed to the Compliance Officer.

- Sharing information about the Community Foundation's work: Community Foundation staff may meet with, or make presentations to, elected officials, government employees, and other stakeholders involved in the policymaking process to discuss the Community Foundation's work.
- Discussing broad social, economic, or other issues: Community Foundation staff may meet with, or make presentations to, elected officials, government employees, and other stakeholders involved in the policymaking process to discuss the status of persistent community issues and the Community Foundation's approach to solving them, including any partnerships or collaborations with other organizations.
- Sharing a nonpartisan analysis, study, or research: Community Foundation staff may meet with, or make presentations to, elected officials or government employees involved in the policymaking process to share information found from Community Foundation research related to community issues.
- Hosting events: Community Foundation staff may host or co-host an event to bring together stakeholders to discuss and identify solutions to persistent community issues.

- Writing letters of support: Community Foundation staff may write letters of support about a government measure that does not specifically pertain to pending legislation or to organizations or government agencies seeking to secure funding or grant support.
- Self-defense communication: Community Foundation staff may attempt to influence specific legislation that would affect the Community Foundation's existence, tax-exempt status, power and duties, or the deductibility of contributions to the Community Foundation.

## **VI. Advocacy Activities that Require Community Foundation Board Approval**

This section outlines the advocacy activities that Community Foundation staff may conduct after receiving approval from the Community Foundation's Board of Trustees. Any items falling into the categories listed below shall be voted on at the regularly scheduled Board of Trustees meetings.

- Direct lobbying and grassroots lobbying: Before Community Foundation staff engage in direct lobbying and/or grassroots lobbying regarding a piece of legislation, approval by the Board of Trustees is required. The staff member(s) who will be engaging in lobbying must present to the Board of Trustees a summary of the piece of legislation, which includes arguments for and against the measure in question and lists potential benefits and drawbacks that may result in lobbying by the Community Foundation. Publicly supporting or opposing legislation: Before Community Foundation staff publicly support or oppose proposed legislation, through written and verbal communication, approval by the Board of Trustees is required. The staff member(s) who will be publicly supporting or opposing proposed legislation must present to the Board of Trustees a summary of the piece of legislation, which includes the arguments for and against the measure in question and lists potential benefits and drawbacks that may result in lobbying by the Community Foundation.

## **VII. Prohibited Activities**

This section outlines activities prohibited by the Community Foundation's staff and Board of Trustees. Staff participation in the activities listed below will result in disciplinary action, which may include termination.

- Community Foundation staff and members of the Board of Trustees, acting as representatives of the Community Foundation, may not participate in any political activities including, but not limited to: making contributions to a politician, political party, or specific campaign; attending fundraising events or rallies for incumbent officials or political candidates running for elected office; endorsing a political candidate; distributing statements for or against a political candidate; or advocating for or against a particular candidate for public office. Community Foundation staff and

members of the Board of Trustees may not participate in political activities while wearing Community Foundation name badges or other Community Foundation insignia and may not distribute Community Foundation business cards while participating in political activities. Community Foundation staff and members of the Board of Trustees may participate in political activities in their private capacity.

- Community Foundation staff and members of the Board of Trustees may not receive gifts from, or make contributions to, political parties, political candidates, or elected officials while representing the Community Foundation. Community Foundation staff and members of the Board of Trustees may receive gifts and make political contributions in their private capacity.