

### ■ [Notes from the Chair](#)

### ■ [Features](#)

- [U.S. Charities Develop Principles for International Assistance](#)
- [International Corporate Grantmaking Models](#)
- [Business a Powerful Force in Tsunami Relief, Recovery and Reconstruction](#)

### ■ [Notes & Announcements](#)

- [2005 Corporate Grantmakers Summit: Leverage and Leadership: Accountability in Action](#)
- [Asia-Pacific Philanthropy Consortium to host WINGS Secretariat for 2007–2010](#)
- [European Foundation Centre Appoints New Chief Executive](#)
- [Just Released](#)
- [Call for Sessions](#)
- [Lecture Series to Focus on International Philanthropy](#)

### ■ [Awards](#) | [Professional Development Opportunities](#)

### ■ [Save the Date](#)

### ■ [Legal Dimensions of International Grantmaking](#)

- [The Debate Over Certification](#)

"International Dateline" is published by the [Council on Foundations' International Programs Department](#). To access previous issues of International Dateline & Legal Dimensions of International Grantmaking, visit the [archives](#). For permission to reproduce any portion of this publication or to provide comments, suggestions, news and story ideas email [Kalyani Grasso \(grask@cof.org\)](mailto:grask@cof.org). We welcome your feedback. © 2005 [Council on Foundations](#) | [Disclaimer](#) | [Privacy Statement](#)

by **Natalia Kanem**

Deputy, Office of the Vice President  
Peace and Social Justice Program, Ford Foundation  
Chair, Council on Foundations International Committee

I am excited about the Joint Working Group on Principles of Accountability for International Philanthropy, established by the Council on Foundations and the European Foundation Centre (EFC). The 16-member group, which I am pleased to co-chair with Luc Tayart de Borms of the King Baudouin Foundation in Belgium, held its first meeting May 11–12 in Brussels.

The working group's goal is to identify core principles of accountability that relate specifically to international philanthropy, addressing issues such as diverse legal requirements, accounting practices, and language and cultural differences that pose special challenges for cross-border philanthropy. Over the course of the next year, the working group will consult with a variety of organizations and experts to develop the principles of accountability with associated practice options and a list of helpful resources.

The joint initiative will supplement the Council's broader domestically-focused, *Building Strong and Ethical Foundations: Doing It Right* initiative, which has been under way since last year. The joint working group has much to do. Starting this summer, the Council and EFC will begin gathering information and later this year will hold separate consultations with their members, peer organizations and experts in North America and Europe respectively. Because incorporating the perspectives of partner and grantee organizations from the global south will be crucial to developing principles of accountability, a "southern" consultation is being planned for early 2006 in South Africa. The final report will be unveiled at the Council's 57th Annual Conference, May 7–9, 2006, in Pittsburgh.

On a personal note, after 13 wonderful years I will be leaving the Ford Foundation this summer to take on the exciting challenge of heading the privately-endowed ELMA Philanthropies. The ELMA Philanthropies Services Company will be headquartered in New York with a funding focus on disadvantaged youth in Africa. While taking on this new role, I will continue as chair of the Council's International Committee and as co-chair of the Joint Working Group on Principles of Accountability for International Philanthropy. I look forward to sharing information with many of you about the accountability initiative with the EFC and receiving your feedback over the next year.



### U.S. Charities Develop Principles for International Assistance

A working group of more than 40 U.S. charitable sector organizations and advisors have completed development of eight fundamental “Principles of International Charity” in response to the “U.S. Department of the Treasury Anti-Terrorist Financing Guidelines: *Voluntary* Best Practices for U.S.-based Charities” issued in November 2002.

“The *Principles* provide a realistic framework to help charitable organizations prevent the diversion of their resources to terrorist organizations,” said Rob Buchanan, director of international programs at the Council on Foundations.

The Treasury Department Guidelines were issued to assist charities in reducing the possibility that charitable funds going overseas might be diverted to terrorist purposes. While acknowledging the necessity of safeguarding charitable assets against diversion to terrorists or other noncharitable uses, charities have criticized a number of the Treasury guidelines as impractical and inappropriate, with potential to discourage international charitable efforts aimed at combating conditions that can breed terrorism. Although nominally voluntary, the guidelines are being referenced as standards and expectations by other government agencies.

“Because international charities work in so many different ways, no one set of practices to guard against diversion of assets to terrorists will be appropriate for them all,” said James K. Bishop, InterAction’s director of humanitarian policy and practice, “but adopting procedures consistent with the principles will afford maximum protection.”

The Treasury Guidelines Working Group was formed after an April 2004 meeting at which Treasury Secretary John W. Snow indicated a willingness to consider changes to the guidelines. The diverse working group includes non-governmental operational agencies, foundations, corporations, watchdog groups, legal advisors and nonprofit umbrella organizations such as **Independent Sector**, **InterAction**, **Grantmakers Without Borders**, the **Islamic Society of North America** and the **Council on Foundations**.

The document specifies eight fundamental principles, including the observance of all applicable U.S. and foreign legal requirements and the adoption of further practices, as deemed appropriate by individual charities, that may provide additional confidence that resources and services are provided for exclusively charitable purposes.

The principles also emphasize that the boards of directors of charities are responsible for complying with the law and that the organization’s commitment to fiscal responsibility—involving appropriate due diligence on prospective partners or grantees, a written signed agreement, ongoing monitoring and correction of any misuse of resources—must be reflected at every level of the organization. The principles also note that charities must be independent to carry out their activities and cannot serve as agents for enforcement of laws or the policies reflected in them.

The Treasury Department has indicated that it intends to revise the guidelines to incorporate key elements of the principles. The full document can be downloaded here (PDF): [http://www.cof.org/files/Documents/International\\_Programs/2005Publications/Principles\\_Final.pdf](http://www.cof.org/files/Documents/International_Programs/2005Publications/Principles_Final.pdf)

---



## **International Corporate Grantmaking Models**

This profile of The Boeing Company's international grantmaking practices is the latest installment in a series of profiles on corporate grantmakers from the Council's Corporate Services department. This profile builds on an earlier report from Corporate Services that describes three distinct grantmaking models based on five companies and foundations including the Alcoa Foundation, Microsoft Corporation, ChevronTexaco Corporation, the Citigroup Foundation and the American Express Company. Visit the Corporate section of the Council website ([www.cof.org](http://www.cof.org)) to read the full profile.

### **The Boeing Company: Direct Contributions through the Corporation**

The charitable investment strategy of The Boeing Company outside the United States focuses on the fundamental needs of countries where Boeing has a presence, specifically health and human services and primary and secondary education.

Tailored, in-country plans follow from this overall global charitable strategy. Although designated representatives at international locations identify and select potential grantees, all international grants are approved by Boeing World Headquarters Community and Education Relations (WHQ C&ER) in Chicago.

The company also maintains a donor-advised fund with United Way International. In addition, certain international locations participate in The Employees Community Fund of The Boeing Company.

Boeing's global charitable strategy was launched in 2003 and is being implemented in phases that support the company's overall global business strategy, with 15 countries and five regions on board thus far. As in the U.S., Boeing's global charitable investment strategy is not based on or driven by business need. Rather, the goal is to improve quality of life in communities where employees live and work, in keeping with the company's core value of Good Corporate Citizenship.

Before launching the first formal global program, Boeing developed a set of grantmaking processes that were reviewed and revised for compliance with new laws—Executive Order 13224 and the USA Patriot Act—that prohibit support of terrorist organizations. New processes for due diligence were developed to address the implications of the new laws, mitigate risks and comply with the changes.

Read the entire profile [here](#).

---



## **Business a Powerful Force in Tsunami Relief, Recovery and Reconstruction**

**by Catherine A. Taylor**

Center for Corporate Citizenship, U.S. Chamber of Commerce

As governments, charities, disaster relief organizations and individuals from across the globe mobilized rapidly to assist people affected by the December 2004 tsunami, the U.S. private sector stood at the forefront as a major contributor of the resources needed for relief, recovery and reconstruction. In fact, never before have American businesses created such an outpouring of assistance.

The Center for Corporate Citizenship (CCC) of the U.S. Chamber of Commerce took the lead in collecting and housing information on the U.S. private sector's contributions to tsunami relief efforts. As of May 5, 2005, the CCC recorded \$528 million in cash and in-kind contributions, and found that companies large and small played a critical role in relief and reconstruction efforts. Remarkably, many small- and medium-sized companies that reported losses during the fourth quarter of 2004 still managed to make significant contributions. Additionally, large companies offered extraordinary levels of cash and in-kind donations. These exemplary corporate citizenship efforts included:

- \$271 million in cash contributions
- \$134 million in in-kind donations
- \$70 million in customer donations
- \$53 million in employee matching contributions.

Corporate citizenship activities are often aligned with the values and interests of individual companies—there is no right way to be a good corporate citizen. Involvement in communities both here and abroad is a decision companies make based on several factors, such as physical presence in a region, employees with family in affected regions, a desire to align the company's product with its giving strategy and the desire to be socially responsible corporate citizens.

Every company has a unique role to play. Here are just a few examples of the roles American businesses have played:

- InVitro International, a four-person development and global marketing company in Irvine, California, focusing on non-animal testing methods, donated more than \$1,000 despite reporting major losses during that fiscal quarter.
- M.I. Industries, a manufacturer of nutritional pet products, provided food for cats and dogs in Tamil Nadu, India, one of the most affected regions.
- In addition to cash and employee-matching contributions, UPS donated \$2.5 million in in-kind services, including shipping up to 1 million pounds of emergency relief supplies per week via air, ocean and ground from its locations in the Americas, Europe and Asia.

As the reconstruction phase commences, companies are now partnering with NGOs and governments in affected countries to focus on sustainable development and lasting economic stability. Organized by the U.S. Chamber of Commerce, the Asia Society, The Asia Foundation and the U.S.-ASEAN (Association of Southeast Asian Nations) Business Council, the Post-Tsunami Summit held on May 12, 2005, in Washington, DC, addressed the long-term reconstruction needs in Asia and Africa. Representatives

from Pfizer and ExxonMobil provided insights on their corporations' tsunami response activities, including why they were motivated to do what they did and the lessons they learned in the process. They talked about the importance of providing feedback to donors, especially employees and shareholders; building partnerships with other companies, NGOs and governments; and being aware of capacity limitations in delivering aid. Charles Hardwick, vice president, Pfizer, observed, "In the long term, good corporate citizenship is good for business." Former President Bill Clinton, who addressed the summit along with former President George H.W. Bush, stated, "I hope this giving [by the private sector] will prefigure a higher level of international giving by private individuals and organizations because they can do it much quicker."

The U.S. Chamber of Commerce has been asked by the Indonesian government to take a leadership role in coordinating the private sector's role in reconstruction. As reconstruction efforts gear up, the CCC remains committed to showcasing the corporate citizenship roles that American businesses have played in this and other humanitarian response efforts.

For more information on the role of the U.S. private sector in tsunami relief, recovery and reconstruction, visit [www.uschamber.com/ccc](http://www.uschamber.com/ccc).

---

Catherine Taylor is the communications and research manager at the Center for Corporate Citizenship (CCC), a 501(c)(3) affiliate of the U.S. Chamber of Commerce. With the mission of advancing the positive role of business in society, the CCC works to facilitate public-private-nonprofit partnerships to engage all stakeholders in disaster assistance and other important corporate citizenship activities. The U.S. Chamber of Commerce is the world's largest business federation, representing nearly 3 million companies, 2,800 state and local chambers, 830 business associations and 102 American Chambers of Commerce overseas. The CCC can be reached at [ccc@uschamber.com](mailto:ccc@uschamber.com).

## Notes & Announcements

### **2005 Corporate Grantmakers Summit Leverage and Leadership: Accountability in Action**



The Council on Foundations 2005 Corporate Grantmakers Summit, Leverage and Leadership: Accountability in Action, will be held June 8–10 in San Francisco. Visit <http://int2.cof.org/conferences/corp2005> for a complete conference program.

The following sessions on Thursday, June 9, may be of particular interest to international grantmakers:

10:30 a.m.–12:00 p.m.

#### **Compliance and Accountability: The Challenges**

Sarbanes-Oxley, stock-exchange listing rules, USA Patriot Act, Senate Finance Committee reforms—these laws, regulations and proposals affect the day-to-day operation of corporate foundations and giving programs alike. A fundamental understanding of their power and influence is essential. In this

session you'll hear a concise overview of the basics: the facts, the driving forces, the effects and the philanthropic field's response.

**Moderator:** Antoinette M. Bailey, vice president, Community Relations, Boeing

**Speakers:** Betsy Buchalter Adler, principal, Silk, Adler & Colvin; Rob Buchanan, director, International Programs, Council on Foundations

1:00 p.m.–2:15 p.m.

### **Perception and Practice: The Opportunities Part I**

Come to this grantmaker panel to hear Linda D. Martin, director, International and National Corporate Citizenship, Boeing, and Amina Dickerson, senior director, Corporate Contributions, Kraft Foods, discuss how regulation and legislation—passed, pending and proposed—have informed and influenced their work; created leadership opportunities; and served as a catalyst for better practices that benefit both the company and the community. Ann Cramer, director, Corporate Community Relations & Public Affairs at IBM Corporation, will moderate the panel.

### **Asia-Pacific Philanthropy Consortium to host WINGS Secretariat for 2007–2010** ↑

The **Worldwide Initiatives for Grantmaker Support** (WINGS), a global network of membership associations and support organizations serving grantmakers, has announced that the WINGS Secretariat is due to move at the end of 2006 from its current host, the European Foundation Centre. The Asia-Pacific Philanthropy Consortium (APPC) will host the WINGS Secretariat for a four-year period beginning in 2007. Based in the Philippines, APPC serves a regional network of 12 countries with its mission of increasing the quantity and quality of philanthropy within and to Asia by strengthening institutional infrastructure and improving the operating environment for philanthropy and the NGO sector. Rob Buchanan (Council on Foundations), chair of the working group that conducted the process, commented: “The committee is excited at the idea that WINGS will be based in Asia, where we are seeing dynamic development in philanthropy. We are delighted that the Secretariat, in its next phase of work, will be able to draw directly on the exceptional leadership and vision of APPC’s executive director, Rory Tolentino.”

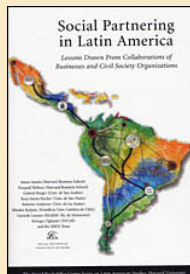
Chair of the Coordinating Committee Monica Patten (Community Foundation of Canada) says: “The principle of moving the Secretariat to a new base every four years is a fundamental part of WINGS’ network-building activity—one way in which we show that we are a global network, able to relate appropriately to all regions of the world. We are pleased that our next move will be to the global south.”

### **European Foundation Centre Appoints New Chief Executive**

The **European Foundation Centre** (EFC) has appointed Dr. Gerard Salole, current Ford Foundation representative for South Africa, as chief executive of EFC headquarters in Brussels. He has previous professional experience with the Bernard van Leer Foundation in the Netherlands, Save the Children Federation and Oxfam. Dr. Salole will assume leadership of the EFC in September 2005. ↑

## JUST RELEASED

The June issue of *Alliance* has a special feature on funding social justice. This feature asks what social justice means and how charitable foundations can promote it in their grantmaking. It looks both at the continuing barriers to funding social justice and at some of the positive things that are being done to overcome the barriers. *Alliance* magazine is published by **Allavida**, a UK-based international NGO. For more information, visit [www.allavida.org/alliance](http://www.allavida.org/alliance).



The recently released book *Social Partnering in Latin America* analyzes how businesses and nonprofits are creating alliances to move beyond traditional corporate philanthropy. A collaborative effort between the **Social Enterprise Knowledge Network (SEKN)** partner schools, the **Harvard Business School** and the **AVINA Foundation**, the book is a result of SEKN and AVINA's broader efforts to promote the inclusion of social enterprise topics as a central component of business programs in universities in Latin America and Spain. Buy it from Harvard University Press at [www.hup.harvard.edu/catalog/AUSSOC.html](http://www.hup.harvard.edu/catalog/AUSSOC.html). The Spanish version of the book will be available free of charge at [www.sekn.org](http://www.sekn.org).

A new report, *Out of Shadows: HIV/AIDS in Burundi, the Democratic Republic of Congo and Rwanda*, was recently released by the London-based charity **New Philanthropy Capital** with funding from the Brussels-based **King Baudouin Foundation**. The report provides prospective donors with contextual information on the extent of the pandemic in the three countries, prevailing needs and current treatment options. The report describes existing initiatives and identifies prospective partners. For more information or to request a free copy of the report, contact Jean-Paul Warmoes at 212/713-7660 or [jeanpaul@kbfus.org](mailto:jeanpaul@kbfus.org).

Request your FREE copy of “**Principles of International Charity**” via e-mail ([internatl@cof.org](mailto:internatl@cof.org)) or phone (202/467-0386). The principles are the result of a collaborative effort of a Council on Foundations-led working group of more than 40 U.S. charitable sector organizations to create an alternative to the "U.S. Department of the Treasury Anti-Terrorist Financing Guidelines: *Voluntary Best Practices for U.S.-Based Charities.*”



## Call for Sessions

The **2006 Annual Conference Committee** invites you to participate in the 57th Annual Conference by submitting a session proposal through the call-for-sessions process. The conference will be held in Pittsburgh, May 7–9, 2006 at the David L. Lawrence Convention Center. The deadline for submission is July 8, 2005. Visit the Council website for detailed information and a submission form or click [here](#).

## Lecture Series to Focus on International Philanthropy

The **Van Leer Group Foundation** of The Hague, Netherlands and the Council on Foundations have announced a partnership that establishes a lecture series on international philanthropy. The lecture series is in honor of **Rien van Gendt**, executive director of the Van Leer Group Foundation and recipient of the Council's 2005 Distinguished Grantmaker Award. The series will be held in conjunction with the Council's annual conference.

## Awards

On April 9, **Ford Foundation** President Susan Berresford became the first recipient of the **International Funders for Indigenous Peoples Award** for her leadership in increasing philanthropic support for international indigenous development projects and communities. Rebecca Adamson, president of **First Nations Development Institute**, presented the award—a soap sculpture called “Transition,” symbolizing a woman’s strength and journey through life.

The **Goldman Environmental Prize**, the world’s largest environmental award, was presented to six grassroots environmental activists from six geographic areas. The activists, who each receive \$125,000, take “environmental activism to new heights for risk, dedication and vision,” says Richard N. Goldman, president of the **Goldman Environmental Foundation**. Find out more: <http://www.goldmanprize.org/press/pressReleaseItem.cfm?prID=81>

## Professional Development Opportunities

The **Center on Philanthropy and Civil Society** at The Graduate Center of the City University of New York is accepting applications for two fellowship programs:

■ **Senior International Fellows Program:** This one-month fellowship provides an opportunity for Third Sector practitioners from outside the United States who are decisionmakers in their professions. For further details, see [www.civicus.org/new/media/e-brochure.SIFP05\\_final.doc](http://www.civicus.org/new/media/e-brochure.SIFP05_final.doc). Application deadline: June 15, 2005 (starts October 17, 2005)

■ **Emerging Leaders International Fellows Program:** This three-month program for younger scholar-practitioners working in the nonprofit sector in the United States and overseas provides leadership training through applied research and professional mentorships. A limited number of fellowships for research on diaspora philanthropy, as well as other topics, may also be available for applicants based outside the United States. For further details, see [www.civicus.org/new/media/e-brochure.IFP06.doc](http://www.civicus.org/new/media/e-brochure.IFP06.doc). Application deadline: June 15, 2005 (starts March 1, 2006). The topic for both programs will be community foundations. E-mail your application to [cpcs@gc.cuny.edu](mailto:cpcs@gc.cuny.edu).



## Save the Date

- June 8–10, 2005: **Council on Foundations** 2005 Corporate Grantmakers Summit, "Leverage and Leadership: Accountability in Action" (San Francisco). See <http://int2.cof.org/conferences/corp2005/> for details.
- July 10–12, 2005: **Council on Foundations** Summer Institutes (Portland). See <http://int2.cof.org/conferences/INGSummer2005/INBprogram.htm> for details.
- July 11–12, 2005: **International Human Rights Funders Group** Semi-Annual Meeting, "Human Rights and Security" (New York City). See <http://www.hrfunders.org/> for details.



## The Debate Over Certification

by **Andrew Schulz**

Deputy General Counsel, Council on Foundations

In an effort to ensure that charitable resources are used exclusively for charitable purposes and not used to support terrorist activity, organizations may choose to adopt practices in addition to those explicitly required by law. Among the practices that some charities choose to adopt is requiring grantees to certify that they do not and will not knowingly provide material support to any individual or entity furthering terrorist activities. Opinions differ on whether requiring grantees to sign certifications about supporting terrorists is beneficial or harmful.

Some believe certification is valuable because it fosters greater awareness of the problem that diversion of funds represents. Grantee certification is also popular among some funders because it provides clear evidence that the funder and grantee are both aware of the problem and that they are taking steps to minimize the risks. Others believe that following the same procedures that the government follows provides protection from liability in the event that money is actually diverted.

Critics argue that certification is worthless and potentially dangerous. The certification itself may have little merit because anyone who knowingly supports terrorists will have no concerns about lying on the certification. Further, even if such language may help reduce the risk that funds are diverted to terrorism, under current U.S. law there is no “safe harbor” available, so certification provides no legal protection in the event that funds are actually diverted. Critics also argue that certification is harmful. They argue that the background checks that an organization would have to conduct to truthfully complete some of the certifications would violate the privacy and employment rights of the organization's employees and other individuals. Even worse, for some grantees operating in volatile areas of the world, the mere appearance that they may be agents of the U.S. government can be a matter of life and death. Forcing them to sign certification language increases their already considerable operational risks.

As with the implementation of any procedure, the decision whether to implement a certification requirement for grantees must be based on each organization's experience and circumstances. While some organizations do require grantees to make such certifications, others do not, relying instead on other procedures to ensure compliance with current law. In most cases, a range of procedures may provide the greatest confidence that assets will be used exclusively for charitable purposes. No single approach will be appropriate in every case.

The next section provides examples of certification language. As you will notice, the certification language currently being used by funders varies considerably in scope. When developing certification language, funders should be especially careful that the language is tailored to address the concerns of minimizing the risk that funds will be used to support terrorism while, at the same time, not limiting a grantee's ability to fulfill the purposes of the grant. For this reason, it is important to consult with knowledgeable counsel to ensure that the choice to require certification and the specific language to use

meets the needs of your particular organization.

■ For additional information, the **United States International Grantmaking (USIG)** project lists resources on anti-terrorism legislation and compliance at: <http://www.usig.org/treasuryregs.asp>.

## **Examples of Certification**

### **Example A**

I certify that \_\_\_\_\_ does not knowingly employ or do business with groups or individuals whose names appear on any list of the U.S. government, the United Nations, or the European Union of known or suspected terrorists. I also certify that \_\_\_\_\_ will comply with all current U.S. laws and regulations governing the disbursement of charitable contributions for overseas activities.

### **Example B**

Grantee warrants that it does not support or conduct, directly or indirectly, violence or terrorist activities of any kind.

### **Example C**

Grantee Organization operates in compliance with the laws of its home country and confirms it does not support, directly or indirectly, any terrorist activities or violence of any kind.

### **Example D**

Our organization or any organization to which we may re-grant these funds operates in compliance with the laws of its home country, and that it takes reasonable steps to ensure that grant funds are not ultimately distributed to terrorist organizations and does not support, directly or indirectly, any terrorist activities or violence of any kind, and that it takes reasonable steps to ensure that staff, board, and other volunteers have no dealings whatsoever with terrorists or terrorist organizations and do not support, directly or indirectly, any terrorist activities or violence of any kind.

We further certify that none of our officers, directors, or other authorized persons who may have contact with us, and none of the officers or directors of any organization to which we may re-grant these funds or any other authorized persons who may have contact with it, is designated as a prohibited person under any U.S. government-issued list or is a national of a U.S. sanctioned country.

### **Example E**

By countersigning this grant letter, you agree that your organization will not promote or engage in violence, terrorism, bigotry or the destruction of any state, nor will it make sub-grants to any entity that engages in these activities.

## **U.S. Agency for International Development (USAID) Certification Regarding Terrorist Financing: Implementing E.O. 13224 (Revision 2)**

Available online at: [http://www.usaid.gov/business/business\\_opportunities/cib/pdf/aapd04\\_14.pdf](http://www.usaid.gov/business/business_opportunities/cib/pdf/aapd04_14.pdf)

1. The Recipient, to the best of its current knowledge, did not provide, within the previous ten years, and will take all reasonable steps to ensure that it does not and will not knowingly provide, material support or resources to any individual or entity that commits, attempts to commit, advocates, facilitates, or

participates in terrorist acts, or has committed, attempted to commit, facilitated, or participated in terrorist acts, as that term is defined in paragraph 3.

2. The following steps may enable the Recipient to comply with its obligations under paragraph 1:

a. Before providing any material support or resources to an individual or entity, the Recipient will verify that the individual or entity does not (i) appear on the master list of Specially Designated Nationals and Blocked Persons, which list is maintained by the U.S. Treasury's Office of Foreign Assets Control (OFAC) and is available online at OFAC's website: <http://www.treas.gov/offices/eotffc/ofac/sdn/t11sdn.pdf>, or (ii) is not included in any supplementary information concerning prohibited individuals or entities that may be provided by USAID to the Recipient.

b. Before providing any material support or resources to an individual or entity, the Recipient also will verify that the individual or entity has not been designated by the United Nations Security (UNSC) sanctions committee established under UNSC Resolution 1267 (1999) (the "1267 Committee") [individuals and entities linked to the Taliban, Usama bin Laden, or the Al Qaida Organization]. To determine whether there has been a published designation of an individual or entity by the 1267 Committee, the Recipient should refer to the consolidated list available online at the Committee's website: <http://www.un.org/Docs/sc/committees/1267/1267ListEng.htm>.

c. Before providing any material support or resources to an individual or entity, the Recipient will consider all information about that individual or entity of which it is aware and all public information that is reasonably available to it or of which it should be aware.

d. The Recipient also will implement reasonable monitoring and oversight procedures to safeguard against assistance being diverted to support terrorist activity.

---

**International Programs Staff**

Phone: 202/466-6512

**Rob Buchanan**, Director, International Programs

**Kalyani Grasso**, Communications Coordinator

**Isabelle Mack**, Operations Manager

**Patricia Marshall**, Associate

**Claudia Di Ioia**, International Fellow