# evergreen

## **Recommendations for a Grant Acceptance Policy**

Grant Acceptance Policy Disappearing Task Force
November 2024

## **Background**

As part of the spring 2024 <u>memorandum of understanding</u> between the College and the Evergreen Gaza Solidarity Encampment, President Carmichael charged a disappearing task force to recommend:

... a policy that would provide criteria for accepting or refusing grant funding based on the purposes of the grant. Criteria would include such considerations as whether grants facilitate illegal occupations abroad, limit free speech, or support oppression of minorities. The recommendations will be shared with the Board of Trustees promptly upon completion and circulated to the Student, Staff and Faculty email DL. This recommendation is due in Fall Quarter 2024, with implementation to begin during Spring quarter 2025 and completed by Spring 2026.

The College's current fundraising policy does not establish criteria for grant acceptance.

## Summary of work to date

In fulfillment of its <u>charge</u>, the DTF has researched ethical philanthropy, academic freedom, current Evergreen policies and practices, and other institutions' relevant policies (<u>Summer 2024 Quarterly Report</u>). Informed by this research, we drafted the attached policy recommendation for community consultation.

## **Opportunities for feedback**

We welcome community feedback via a <u>survey</u> (open until 12/4) and <u>discussion groups</u> (to be held 12/2 and 12/4). Please sign up for the discussion groups <u>here</u>.

## Key components of the recommended policy draft

- The authority for accepting grant funds rests with the College. Pursuit of grant funding is a privilege of employment, and faculty and staff must meet certain responsibilities to maintain this privilege.
- The purpose and activities of all grants will be reviewed prior to acceptance for ethical, administrative, and mission-based criteria.
- The purpose and activities of funding organizations and partner organizations must be considered in determining a grant's purpose, in addition to the purpose and activities of the specific grant proposed.
- Academic freedom is a right of faculty covered by the faculty collective bargaining agreement.
- Academic freedom carries with it generally-accepted individual and collective responsibilities (e.g., <u>AAUP</u> FAQ).
- Grant-funded activities must uphold the principles of academic freedom for individuals and may not impinge on the academic freedom or free speech rights of students or other faculty and staff at Evergreen.
- A grant fundamentally represents a relationship between a funding organization and the College, not between the funding organization and College investigators or personnel working on a grant-funded project.
- The College must protect its reputation and the integrity of its curriculum and programs, including in its performance of grant-funded activities and its relationships with grant funders.
- A procedure will allow for tiered review process. Most grants will qualify for an administrative review like the
  current procedure, with minimal impact on shared governance. Some specific conditions or circumstances will
  trigger an independent, consultative review that relies on input from interested or affected parties to a
  proposed grant that may include faculty, staff, and students. Based on previous history with grant seeking at
  Evergreen, we anticipate this will happen one or two times per year at most.
- Some specific conditions or circumstances, as a matter of policy, will lead to an automatic decision to decline grant funding.

# **Preliminary Draft Grant Acceptance Policy**

For Evergreen Community Review and Feedback

Drafted by the Grant Acceptance Policy DTF

11/14/2024

**Related Policies:** Foundation, The Evergreen State College; Fundraising

**Previous Policy:** The college has not had a grant acceptance policy prior to this proposed policy.

## 1. Purpose

The Evergreen State College welcomes grant funding from external organizations to help fulfill its role as a public institution of higher education. The College encourages faculty and staff to pursue grant funding for projects that support its education and public service mission. This policy establishes that, to be accepted by the College, grants must a) meet defined ethical principles, b) align with the College's stated mission and values, and c) demonstrate it can be successfully implemented within the College's administrative, financial, and physical capacities. The policy defines criteria for grant acceptance and authorizes establishment of a process for its implementation.

## 2. Rationale

Beyond financial considerations, grant funding often has multiple additional impacts that the College must evaluate before accepting a grant award. Grants frequently involve commitment of College administrative, financial, and physical resources that are not always supported by grant funding. Furthermore, grants signal a relationship between the College and a funding organization; such relationships represent a demonstration of Evergreen's values and priorities as an institution. Finally, grant funds are College funds, and activities funded by grants are *de facto* activities undertaken and approved by the College; these activities are Evergreen's responsibility and as much an expression of the College as activities funded by other sources of revenue.

## 3. Grants must adhere to the College's commitment to ethical and social responsibility.

As a public institution of higher education, Evergreen commits itself to operate within sound ethical principles in all its activities, including those funded by grants. This is further reflected in the College's mission, which states that the College "supports and benefits from local and global commitment to social justice, diversity, environmental stewardship, and service in the public interest." Based on these principles, the College will only accept grants where the purpose and activities of the grant adhere to the following principles:

- **3.1. Respect for persons:** The grant treats all human beings as autonomous agents whose opinions and choices are valued. People with diminished autonomy are protected.
- **3.2. Beneficence:** The grant does not harm human beings and seeks to maximize possible benefits to people and society.

- **3.3. Justice:** The grant treats all human beings in a manner that is equitable and fair, upholds Evergreen's Equal Opportunity and Diversity Policy, and respects the College's commitment to advance social justice.
- **3.4.** Respect for law, including international law, and public interest: The grant upholds the laws under which the College must operate and honors international law as recognized by the United Nations International Court of Justice and other recognized legal bodies. The grant does not promote actions that are against the law or serve to undermine public trust.
- **3.5. Academic freedom and integrity:** Members of the Evergreen faculty are entitled to full freedom in their teaching and research and in the dissemination of their ideas consistent with the First Amendment. Academic freedom provisions for faculty are outlined in various governance documents, including the College's collective bargaining agreement with the United Faculty of Evergreen.

Academic freedom also places responsibilities on individual scholars and researchers. These include demonstration of ethical practices, good faith endeavors to be accurate and truthful, operating only within one's area of expertise, and commitment to non-discrimination. Academic freedom and responsibility are inseparable and must be considered simultaneously; they are shared by all members of the academic community.

Grant funding to the College to support faculty research and activities also presents unique institutional responsibilities to ensure the ethics and integrity of the College's operations and preserve public trust. These responsibilities can come into tension with concerns for individual academic freedom. This policy recognizes that grants are awards to the College and not to individual investigators. Participation in grant-funded activities is a privilege and not an entitlement of employment at Evergreen. As such, the College must take responsibility to ensure that the purpose and activities of a grant avoid 1) undue influence on the College's curriculum and programs; 2) impingement on the free expression and academic freedom of other members of the College community; 3) undue influence on the speech and extracurricular activities of students; and 4) denigration of the College or College community members. Academic freedom is not absolute and will not outweigh these additional responsibilities carried by the institution.

4. The mission, purpose, goals, and activities of funding organizations and partner organizations will be considered as part of determining the purpose of a grant.

Funding organizations make grants with their own purpose in mind. They have reasons for making grant awards to other organizations. Similarly, partner organizations have purposes and missions that are distinct from Evergreen's purpose and mission. It is not possible to completely separate a grant's purpose from the work of a funding organization or partner organization(s); thus the purpose of these organizations must be considered in determining if the purpose of a grant meets College requirements.

5. Grants must support the College's mission and purpose and demonstrate plausibility for success. As an extension of the College's work and public identity, grants must align with the College's stated mission. No grant shall denigrate or undermine the College or its students, staff, faculty, alumni, or interested or affected parties. The College also must ensure that a grant does not introduce unacceptable institutional risks and liabilities that may result from grant administration, activities, or public scrutiny. The College will only accept a grant that, in addition to meeting ethical requirements, demonstrates a plausible chance for success within the College's available human, financial, and physical capacities.

## 6. All grant proposals will be evaluated prior to accepting funding.

Before accepting grant funding, the College will, based on the purposes and activities of the grant, evaluate every grant proposal, including renewals, for adherence to these principles and alignment with the College's mission and values. Aspects to be reviewed and considered within each grant proposal include but may not be limited to:

- Goals and objectives of the proposed grant
- Activities and spending of the proposed grant
- Mission, purpose, goals, and activities of the funding organization
- Mission, purpose, goals, and activities of partner organizations participating in a grant project.
- Support of and alignment with the College's mission and values
- Risks to the College, including risks to reputation.
- Plausibility for success of grant as proposed.

College faculty or staff proposing a grant will provide all available information and documentation about the grant as part of the evaluation procedure. Failure to submit grant information for review in a timely manner or withholding of key information are grounds for non-acceptance.

#### 7. Authority for accepting or declining grant funding

Final authority to accept or decline grant funds rests with the president of the College. The president may designate this authority. The president may decline grant funding for reasons not covered in this policy.

#### 8. Requirements for acceptance of grant funding

- 8.1. Grants must meet the requirements described in sections 3 through 6 of this policy to be accepted.
- **8.2.** Grants must be reviewed and approved according to the College procedure outlined below. Unreviewed grants will not be accepted.
- **8.3.** The grants office is the only entity on campus authorized to submit grant proposals on behalf of the College. Grants not submitted through the grants office, unless approved in advance, may not be accepted.

- 8.4. Principal investigators and other grant directors must have a current relationship with The Evergreen State College as faculty or staff. Employment or contracted appointments must last at least through the proposed grant period of performance.
- 9. The College establishes the following specific criteria for an automatic non-acceptance of a grant, in keeping the requirements outlined in sections 3 through 6 described above.
  - 9.1. In considering the purpose, goals, objectives, and activities of a specific proposal, the College will decline any grant that:
    - Violates laws and policies applicable to the College.
    - Seeks to exercise control or undue influence over any of the following: educational materials or student projects, student organizations, campus events, faculty or staff hiring, campus climate, or grant outcomes.
    - Seeks to influence legislation or participates in political advocacy for foreign or domestic governments.
    - Violates College policies and procedures, including the grant review process.
  - 9.2. In considering the mission, goals, objectives, and activities of funding or partner organizations, the College will decline any grant from a non-governmental organization that:
    - Affiliates with, support, or legitimize human rights violations, illegal occupation, limits to free speech, or the oppression of minorities.
    - Takes part in arms dealing and manufacture, in particular controversial weapons/indiscriminate armaments.
    - Has negative impacts to the environment or engages in fossil fuel extraction, in conflict with the College's commitment to sustainability and environmental justice.
    - Politically advocates for foreign governments or entities that engage in controversial, anti-democratic, human rights abusing activity.

Should a domestic government agency be the granting organization and involved in the above activities, additional review may be advised and the proposed grant subject to non-acceptance.

- 10. The College will implement a procedure to ensure compliance with this policy. Grants that do not meet requirements will not be accepted.
  - 10.1. The procedure will be administered by the grants office.
  - 10.2. The procedure will be posted in a place easily accessible to all faculty, students, and staff.

- 10.3. The procedure will be designed to be as efficient and timely as possible in recognition that many grant proposals have deadlines.
- 10.4. The grants office will have authority and responsibility to gather all relevant information required for determining if a grant is eligible for acceptance.
- 10.5. All proposed grants will undergo a thorough review conducted by staff in the grants office and Business Services as well as the divisional representatives in the divisions impacted by the grant.
- **10.6.** Each divisional representative is responsible for grant acceptance decisions for grants administered within or affecting their respective divisions. All decisions are subject to review by the president, who has ultimate authority for final grant acceptance decisions.
- **10.7.** Funding organizations and partner organizations reviewed for previous grants may not require repeat review for each new proposal. The procedure should allow for periodic review of repeating organization for continued alignment with this policy.
- 10.8. When possible, grantseekers will be given an opportunity to make the revisions necessary for the proposal to meet requirements and mitigate risk.
- 11. The College will require additional review, beyond those described in section 10, of grant proposals when necessary to reach an informed decision.

The grant proposal requires additional review when a variance with the acceptance criteria in this policy is suggested or appears possible in the proposed grant. The divisional representative will convene an independent review relying on interested/affected parties, including faculty, staff, and/or students, to advise on the appropriateness of the grant.

12. This policy also applies to grants sought or secured by The Evergreen State College Foundation on behalf of the College.

#### 13. Definitions

**Grant:** An award of financial assistance, including a cooperative agreement, in the form of money, or property in lieu of money, to an eligible grantee. The definition does not include technical assistance (i.e., services) instead of money; revenue sharing; loans; loan guarantees; interest subsidies; insurance; direct appropriations; or assistance such as fellowships or other lump sum awards for which the grantee is not required to account.

**Grant activities:** Any good or service procured or any or action undertaken to meet the requirements of a grant, including items that are a) paid for using grant funding; b) paid for by other sources in fulfillment of grant requirements; or c) provided by voluntary or in-kind sources. Examples of grant activities include but are not limited to purchases; research; employment; volunteer recruitment and coordination; community development; client services; student services; student activities; product development; facilities construction, maintenance, and refurbishment; marketing and communications; educational and extracurricular programming and development; health initiatives;

conservation; compliance; arts projects; and internships. Grant activities are often, though not always, encompassed in grant award agreements.

**Funding organization** — A private organization, nongovernmental agency, or government agency that provides funding for a grant.

**Partner organization** — An organization external to the College that participates in grant activities as approved by the funding organization. Partner organizations may or may not receive funding from a grant.

**Purpose of a grant** — The reason or reasons, stated or inferred, that a funding organization would provide grant funding and that Evergreen would accept grant funding. It is encompassed by two components: a) the goals, objectives, and activities stated or implied in a grant proposal on behalf of Evergreen; and b) the mission, goals, objectives, and activities of the funding organization, stated by the organization or inferred by its activities.

**Divisional representative** — The vice president or other senior executive with responsibility for managing an administrative division of the college. [Current college divisions include Academics; Advancement; Administrative Operations; Enrollment Services; Finance; Legislative Affairs; Marketing and Communications; and Student Engagement, Equity and Support (SEES).]

**Interested or affected party** — An individual, office, or organization at Evergreen that has an active role in or is likely to be significantly impacted by a particular project or initiative.

Academic freedom — Academic freedom is primarily defined by the faculty collective bargaining agreement (CBA). That agreement defines academic freedom based on the 1940 American Association of University Professors Statement on Academic Freedom and Tenure, along with the 1970 Interpretive Comments to that statement. Through the CBA, the faculty and the College agree that the College, as other institutions of higher education, is conducted for the common good, which depends upon the free search for truth and its free exposition. Fundamental to that purpose is academic freedom, which applies to both teaching and research. Members of the faculty are entitled to full freedom in their teaching and research and in the dissemination of their ideas consistent with the First Amendment.

**Grants office** — The office responsible for all pre-award grant administration and proposal submission at the College [currently the Grants and Foundation Relations office in Advancement].