**FOREIGN GRANTEES – ANTI TERRORIST GUIDELINES**

October 28, 2011

Potential foreign grantees must be vetted against the Office of Foreign Assets Control (OFAC) Specially Designated Nationals (SDN) list or Terrorist Exclusion List (TEL).

The Grants Administrator will access the government’s anti-terrorist web site (http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx) and confirm the prospective grantee is not listed therein. This vetting is documented on the Tax Status screen of the organization’s record in the Gifts database, and included on the Foundation’s internal Yellow Checklist.

The Foundation’s practice is to never make grant payments in currency – only via check requiring proper endorsement or direct wire transfer. This process documents who received the funds and eliminates money from falling into the hands of terrorists.