

THEREFORE...

I appeal to you therefore, brothers and sisters, by the mercies of God, to present your bodies as a living sacrifice, holy and acceptable to God, which is your spiritual worship. Romans 12:1

Periodical of the Christian Life Commission of the Baptist General Convention of Texas

Volume 9, Number 4

Charitable Choice: I

This special two-part **Therefore** focuses on faith-based initiatives, popularly known as Charitable Choice. The following text is adapted and abridged from major sources which are closely documented in the endnotes. Special thanks goes to Brent Walker, Executive Director of the Baptist Joint Committee on Public Affairs (BJCPA); to Melissa Walker, Executive Director of the Pew Forum on Religion and Public Life and former general counsel of the BJCPA; and to Derek Davis, Director of the J. M. Dawson Institute of Church-State Studies, Baylor University, whose significant contributions are evident throughout the text.

In 1996, Congress passed and President Clinton signed into law welfare reform legislation which contained so-called “Charitable Choice” provisions allowing government to fund the social ministries of houses of worship and other pervasively religious organizations. As one of his first actions upon taking office, President George W. Bush opened a White House Office of Faith-Based and Community Initiatives and announced his intention to expand Charitable Choice to apply to all government-provided services.¹

The new idea represented by Charitable Choice is not the involvement of faith communities in the social service arena, since many religious organizations have a deep history of involvement in such services. Nor is government funding of religious social service providers in itself an innovation, since prior to Charitable Choice, governments at all levels awarded grants and contracts to *religiously*

affiliated organizations, i.e., organizations which are affiliated with a religious body and perform secular social services. Any religious activities offered by these organizations are independent from secular social services and are voluntarily attended. Catholic Charities and Lutheran Services in America are religiously affiliated organizations which receive substantial government funding. The Supreme Court has long ruled that government funding of secular social services through such organizations is constitutional.²

What is new about Charitable Choice is that it significantly broadens the scope and extent of government financial collaboration with faith-based organizations by allowing *pervasively sectarian organizations* like houses of worship to receive government funding. In pervasively sectarian organizations, religious activities—worship, preaching, teaching, proselytizing—are practically insepa-

rable from social ministries. Indeed, the integration of religious faith and social ministry are central to the mission and self identity of pervasively sectarian organizations.³

Charitable Choice legislation reflects some sensitivity to the obvious religious liberty issues raised by government funding of churches and other pervasively sectarian organizations in its attempt to establish certain safeguards regarding the rights of social service recipients. If a benefits recipient objects to the religious character of the institution where he or she receives services, the state must provide an alternate provider within a reasonable time frame. The religious organization may not discriminate against a benefits recipient on the basis of his or her religious beliefs or refusal to participate in a religious practice. No government funds flowing to a religious organization to provide benefits and administer programs under Charitable Choice may be used in sectarian worship, instruction, or proselytization.⁴

Charitable Choice legislation also contains provisions which protect the free exercise of the religious organization. The state may not impair the religious character of the organization. The religious organization remains independent from federal, state, and local governments including the organization's control over "the definition, development, practice and expression of its religious beliefs." No federal, state, or local government may force a religious organization to alter its form of internal governance or to remove "religious art, icons, scripture, or other symbols" from its premises in order to participate in the program. A participating religious organization continues to be partially exempt from the discrimination prohibitions of the Civil Rights Act of 1964, thus allowing the organization to discriminate in its hiring practices on the basis of religion. Moreover, while a participating religious organization is subject to the same accounting regulations as any other contracting party, as long as the religious organization segregates government funds from other accounts, the organization is subject only to a limited audit. Finally, a religious organization may sue a state in state civil court if it believes its rights under Charitable Choice have been violated.⁵

The passage of Charitable Choice into law and the emphasis placed on Charitable Choice by the

current administration raises a number of important questions.

- ❖ Whatever the courts decide regarding its constitutionality, is Charitable Choice *good* for churches and other pervasively sectarian organizations?
- ❖ In light of Baptist tradition and history, is Charitable Choice *right* from a religious liberty perspective?
- ❖ Given the certainty of eventual litigation, will Charitable Choice be upheld as constitutional?⁶

Is Charitable Choice Good?

Regulation

Government regulates what it funds. This is not only a legal principle, but also an ethical obligation. Tax payers have the right to accountability regarding the use of public funds.⁷

Some regulation is specified in the Charitable Choice law itself. For example, institutions receiving direct grants must ensure that tax money is not used for sectarian worship, instruction, or proselytization. The statute also requires audits. If a house of worship segregates Charitable Choice funds from other funds, then the audit would concern only the Charitable Choice funding. But if a church does not segregate funds in this way, then the government will be able to review all of the church's financial records, applying the same oversight and investigatory practices it employs with others with whom it contracts.⁸

Regulation in the statute itself is usually just the tip of the regulatory maze which finds those who receive government funding, whether the money is received directly or indirectly. For example, all colleges and universities must sign a "Program Participation Agreement" if they participate in student federal financial aid programs. This five-page, single-spaced listing of "selected provisions" from the Code of Federal Regulations is a sobering read for anyone considering applying for federal funding. Some of the laws mentioned in this document—including Section 504 of the Rehabilitation Act (barring discrimination on the basis of handicap), the Age Discrimination Act, and Title VI of the Civil Rights Act of 1964 (prohibiting discrimination on the basis of race, color, or na-

tional origin)—would appear to apply to the activities of houses of worship and other religious ministries that receive Charitable Choice money.⁹

Even if Charitable Choice funding is distributed to churches through vouchers, these laws may apply. Contrary to popular opinion, vouchers are not free of regulation.¹⁰

Depending on a technical interpretation of these laws, they could bind the entire church or religious ministry rather than simply the Charitable Choice program. As Richard Hammar, author of *Pastor, Church & Law* notes:¹¹

*In most cases, church programs and activities are conducted in the church facility itself, not in a geographically separate facility. In such cases, the . . . federal anti-discrimination laws discussed above will apply to the entire church and all of its programs and activities.*¹²

The issue here is not that houses of worship are interested in discriminating on the basis of handicap, age, or race. Most churches are simply unequipped to jump through the regulatory hoops necessary to prove compliance with such laws, and proving compliance is likely to take a large toll on religious autonomy. To comply with the federal nondiscrimination requirements, organizations must provide assurances of compliance, keep extensive records and file timely compliance reports, grant access to the government to sources of information, publicize the organization's obligations to protected classes, submit to periodic compliance reviews and federal investigations looking into violations, and monitor new regulations.¹³

Further, because Charitable Choice contemplates religious organizations administering traditional government benefits such as food stamps, churches could be required to navigate government-mandated procedures which accompany changes in benefits. Here again, while most churches will not object to the goals of such regulation, they will typically not have the resources, expertise, and perhaps the patience to do the monitoring, record keeping, and reporting required.¹⁴

Charitable Choice providers may also be required to comply with state and local civil rights laws and a host of health and safety standards. In addition to being at least as detailed and onerous as federal

regulation, state and local regulation can be even more idiosyncratic and inflexible. For example, Massachusetts' licensing standards for certain substance abuse centers includes instructions on night-light placement and window-washing procedures.¹⁵

Charitable Choice specifies that the government cannot take away a religious organization's "control over the definition, development, practice, and expression of its religious beliefs," but a significant amount of regulation may not be seen as interference with such control. The courts will not necessarily find that complying with certain health standards or being subject to lawsuits under the Rehabilitation Act undermines a church's control over its religious practice.¹⁶

Some supporters of Charitable Choice argue that the government's role can be limited to providing funding, setting eligibility criteria, and evaluating results. While even this type of government involvement with houses of worship raises warning signs regarding entanglement, the argument seems unrealistic.¹⁷ As conservative Ronald Trowbridge states, "It defies history and common sense to argue that the recipient of largesse can forever restrict the terms of the giver . . . [To so argue] is indeed the triumph of hope over experience."¹⁸

Litigation

Providers must be prepared to be sued under the regulation to which they are subject. For example, if a church is charged with violation of one of the nondiscrimination laws mentioned earlier, it could be called before an administrative agency and/or a court and forced to produce records to rebut the complaint. Beneficiaries may also sue Charitable Choice providers for violations of certain Charitable Choice provisions. In addition, it is inevitable that lawsuits will be filed over the constitutionality of Charitable Choice.¹⁹

There may be other miscellaneous lawsuits. For instance, some plaintiffs may claim that certain churches and other religious providers submitted false information to the government to receive federal funds. Even if these claims are completely unfounded, refuting them may incur substantial legal fees.²⁰

Confusion

The ban on using grants for sectarian worship, instruction, or proselytization highlights an inconsistency in the Charitable Choice agenda. Charitable Choice proponents emphasize that the religious content and context offered by religious providers make these providers' social ministries particularly effective. Because the Charitable Choice law explicitly prohibits the use of grant money for religious purposes, some proponents have encouraged religious ministries to use public money for the secular aspects of their programs, thereby freeing private funding for specifically religious aspects.²¹

Taking money out of one pocket and putting it into another seems to amount to what the Supreme Court has referred to as “a legalistic minuet.” By definition, in pervasively sectarian organizations, sacred and secular functions cannot be sealed off from each other. To fund any part of a church or other pervasively sectarian entity is to fund the whole religious endeavor. Hence, the confusion: pervasively sectarian groups can use a legal loophole that elevates form over substance or they can conscientiously apply the prohibition on sectarian worship, instruction, or proselytization throughout their ministries, thereby jeopardizing their essential genius and purpose.²²

Distortion of Mission

Another danger for religiously based providers of Charitable Choice benefits is that governmental objectives and procedures will begin to shape religious ministries. In a recent article, Joe Loconte notes that “[e]ven private agencies with the best of intentions may assume tasks that have little to do with their original purpose and for which they may be ill-equipped.”²³ Loconte quotes the Salvation Army's Jacquelin Triston:

*Most everyone is fighting for every penny they can get to run whatever program they have . . . It's really a matter of, if you can't do it the way you want, then you'll take your program and you'll fit it into what government will give you money for.*²⁴

Even more ominously, governmental objectives and procedures may actually clash with religious doctrine. According to one pastor, “Biblical concepts

of ministry to the poor are not those of the modern welfare state.”²⁵ The threat is that government funding and regulation could drive and shape religious ministries, creating a kind of “wag the dog” effect.²⁶

Co-option by Government

Another danger of partnership with government is that houses of worship may come to be viewed as arms of government. Churches and other religious ministries could become administrative centers for government benefits and services and perform related duties like terminating certain benefits, reporting on individuals, and otherwise policing the system. Aside from possible constitutional issues, the church's acting as an agent of the state is not good for the church. Independence from the state allows the church to be the church—to be the salt of the earth and the light of the world, to sound a meaningful prophetic voice, to serve as a place of sanctuary. Blurring the line of distinction between church and state compromises the identity of the church.²⁷

Divisiveness

Since government will be able to provide Charitable Choice grants to only some of the country's thousands of identifiable religious expressions, religious groups will inevitably compete against each other for funding. All too often, majority religions will prevail in the competition for funds. It will be difficult, for example, for Muslims or Buddhists to prevail over Baptists in competing for the same government grant in Alabama. As government picks and chooses between religions, competitive and divisive resentments will multiply.²⁸

Some proponents have suggested that voucher systems would avoid such divisiveness. But vouchers would tend to shift the locus of competition from governmental agencies to the recipients themselves, hardly a happy prospect.

Dependency

Ministries which receive government subsidies tend to become dependent on such funding. This dependency is exacerbated by the tendency of private donors to divert funding to recipients who do not benefit from government largesse. When government begins funding ministries, some donors

feel their contributions are no longer needed, and others simply prefer to support ministries which are free of government control and regulation.²⁹

Loss of Prophetic Role

Participation in Charitable Choice will jeopardize religion's historic role as the prophetic critic of government. On all kinds of issues—race relations, justice for the poor, war and peace, sanctuary for refugees, drug and alcohol abuse, pornography, criminal justice, government corruption, and many others—churches and other religious organizations have sounded prophetic voices and precipitated change. If Charitable Choice is a partnership between religion and government, religious groups will tend to become “junior partners,” one class of government contractor among many who are all more or less dependent on government grants. Groups which are dependent upon government are disinclined to criticize government.³⁰

Is Charitable Choice Right?

A Violation of Religious Liberty

Whether or not Charitable Choice is eventually found by a majority of the Supreme Court to be unconstitutional, one reality clearly attends this legislation. Every distribution of taxpayer dollars to a church, synagogue, mosque, or other religious organization is a violation of the religious liberty of taxpayers who would find objectionable the propagation of the form of religious belief represented by the recipient.³¹ Constitutional theories notwithstanding, Charitable Choice will inevitably result in the advancement of religious belief by government. From a traditional Baptist perspective regarding religious liberty and the separation of church and state, it is *wrong* for the government to advance or inhibit religious expression. From this traditional Baptist perspective, which is informed both by our understanding of the Bible and our experience of persecution, true religious belief is inherently *voluntary*. Violations of voluntarism are wrong whether they occur in first-century Rome or sixteenth-century Europe or twenty-first-century America.

Adopted with the strong support of eighteenth-century Baptists, the religious liberty clauses of the First Amendment to the Constitution were clearly intended to prevent the violation of that liberty

which occurs when public funds are used to advance religious belief. In the words of Thomas Jefferson, “to compel a man to furnish contributions of money for the propagation of opinions which he disbelieves and abhors is sinful and tyrannical.”³²

The Illusion of Vouchers

According to the Charitable Choice law, there is no bar on using government funds for sectarian activities if such aid is voucherized. Indeed, some constitutional scholars believe that a majority of the Supreme Court will uphold Charitable Choice to be constitutional if grants are provided in the form of vouchers. Here again, the projected constitutional finding of justices does not resolve violations of voluntarism. If we believe that true faith is inherently uncoerced, then we must also believe that coming to church with a government-issued voucher is not the same as coming to church just because you want to. Charitable Choice vouchers will draw vulnerable people through the doors of houses of worship with the aid of a government magnet. They may have the right to get their benefits elsewhere but, as stated above, the law does not even require them to be notified of this right.³³

Reordered Discrimination

One of the greatest flaws in neutrality programs like Charitable Choice is that they miss their stated target. Rather than achieving the purpose of eliminating discrimination against religious groups, these programs simply rearrange the nature of discrimination in favor of majority religions or those groups predisposed to receiving government subsidy. For example, the Jehovah's Witnesses' denial of the legitimacy of the state and their prohibitions against the involvement of their membership in government activities generally restrict their participation in programs like Charitable Choice. Advocates might argue that such exclusions are rare, self-imposed, and result from uncoerced acts of conviction. These exclusions would certainly not be rare since every religious group in the country would fall somewhere on a continuum of participation under any neutrality scheme. Roman Catholics might participate heavily in aid to religious education programs but reject participation in programs that provide certain family planning services. Some evangelical groups might accept funding to support the operation of

soup kitchens while rejecting aid to support child-care centers for working moms. Seventh-day Adventists would likely reject all government aid programs.³⁴

Moreover, public resources will tend to flow to those programs that are popularly affirmed by a majority of the nation. Since there are now approximately two thousand identifiable religions and sects in the U.S., it will be impossible to fairly and equitably distribute government monies among them all. Instead, governments at all levels will be forced to make hard choices about which faith groups receive public money. These determinations will necessitate government decisions regarding the utility of religious programs. Inevitably, those with the most financial resources and political clout will get the largest share grants. The point is that the kind of neutrality thinking embodied in programs like Charitable Choice will not, in fact, result in *nondiscrimination*, but a reordered form of *discrimination*.³⁵

Better Options

Religious organizations have several better options than Charitable Choice for partnering with government to provide social services.

Provide Services through Religiously Affiliated Organizations

Pervasively sectarian organizations like houses of worship should consider spinning off separate, religiously affiliated organizations to provide social services with public money. As stated above, this option has been used by religious organizations for decades and is not plagued with the many difficulties which attend the funding of pervasively religious organizations through Charitable Choice.³⁶

Providing government-funded social services through religiously affiliated organizations requires care and skill to avoid crossing legal and ethical boundaries. The following guidelines are offered to help navigate these boundaries:³⁷

- ❖ *Apply for incorporation as a tax-exempt, nonprofit organization, often known as a 501(c)(3).* While separate incorporation may not be legally required, this action provides crucial legal benefits to the organization. Separate incorporation provides an institutional separation from, and minimizes

liability for, the pervasively religious body. Even though this process is not difficult, obtain the help of a qualified attorney.

- ❖ *Segregate tax funds from other funds and use tax funds only for secular activities.* Government has the right to audit the funds it disburses. Although the law does not necessarily require a religious organization to segregate its tax funds from other funds, religious organizations greatly reduce their risk of overly intrusive audits and lawsuits by keeping funds separate. Segregation of tax funds will also serve as a constant reminder that tax funds must only be used for secular purposes.
- ❖ *Do not discriminate on the basis of religion or religious belief in hiring and firing in the context of the tax-funded program.* The Supreme Court has not addressed whether a religious organization retains the liberty to make employment decisions on the basis of religion in the case of employees who work in programs or activities funded in whole or in part by government funds. A lower court has held that the Salvation Army could not fire a Wiccan employee whose salary was substantially funded with tax dollars. Even though the *law* is not settled in this area, it is ethically problematic to accept taxpayer funds for certain positions and then to fire or refuse to hire certain taxpayers because they are not the “right” religion or do not hold the “right” religious beliefs.
- ❖ *Serve all clients equally, regardless of their religious beliefs.* In all tax-funded activities, refrain from asking about clients’ religion or religious beliefs. Every citizen is entitled to equal access to tax benefits. An organization is legally prohibited from discriminating on the basis of religion in the provision of tax-funded benefits.
- ❖ *Ensure that clients know they have the right to seek services from a secular provider.* Even though the state has some responsibility to provide this information, social service providers have the ethical duty to provide this information as well. Let clients know from the outset that wholly secular alternatives are available and that you will help them access these alternatives if they so

desire.

- ❖ *Separate tax-funded services from privately funded religious activities.* Religious affiliates which provide both tax-funded social services and privately funded religious activities should separate the religious activities from the tax-funded social services. For example, a religious provider that offers government-funded welfare-to-work counseling may post notices about support groups that engage in prayer and Bible study as long as the support groups are privately funded, participation in them is voluntary, and it is clear that the groups are separate from the welfare-to-work counseling. A provider that offers government-funded services may leave religious literature on tables in waiting rooms if the religious literature is paid for with private funds and it is clear that acceptance of the materials is voluntary and not a part of the government-funded program.
- ❖ *Offer tax-funded services without regard to participation in any religious activities.* Clients should be permitted to obtain tax-funded services without having to be exposed to or participate in religious activities. Clients should not only be so permitted, but providers should ensure the ease of clients' ability to actively or passively decline participation in religious activities. Providers must respect that vulnerable clients are often drawn into religious organizations simply because they are seeking tax-funded assistance. This sort of attraction is clearly different from genuinely voluntary attendance. Make it absolutely clear to clients that participation in religious activities is absolutely voluntary and in no way connected to receiving the benefits of the tax-funded program. Care must be taken to ensure that staff follow not only the letter of this rule, but also its spirit. Staff members should not, for example, reflect negative attitudes toward those who decline to participate in religious activities.
- ❖ *Ask an attorney and certified public accountant (CPA) to evaluate the compliance requirements and potential liability of any tax-funded arrangement before accepting tax funds.* It is

critical that an attorney and CPA professionally evaluate an agreement to accept government funding before any agreement is signed. There may be an attorney and CPA in your church who would be willing to conduct this evaluation or to recommend other professionals.

Expand Privately-Subsidized Community Service Programs of Pervasively Sectarian Organizations

Another option for pervasively sectarian organizations is to establish expanded, *privately funded* community service programs. For example, Christian Women's Job Corps, a ministry launched by the Baptist Women's Missionary Union, consists of volunteers who provide a myriad of services to help welfare recipients move off welfare and into work. Since it is privately funded, Christian Women's Job Corps appropriately incorporates Bible study as a key element of its ministries.³⁸

Conclusion

Debates over Charitable Choice sometimes present a false dilemma: defend religious liberty or minister to people in need. We do not, in fact, have to choose between attending to social ills and supporting pervasively religious institutions through government funding. We do not have to violate religious liberty in order to help the poor.

Christians recognize both the biblical call to minister to people in need and the unique role that churches can play in addressing poverty, homelessness, drug dependence, and other social ills. Christians who are committed to religious liberty and separation of church and state appreciate the ramifications of receiving tax funds and value the freedom that independence from government regulation provides.³⁹

Religion remains robust in America in large measure because it has remained independent of government support and regulation. Americans support houses of worship and other pervasively religious institutions in financial and other ways at least in part because government has *not* directly supported these institutions. A new era of government benefits to religion will damage the voluntary spirit that sustains the vibrancy and dynamism of American religion.⁴⁰

¹ *Keeping the Faith: The Promise of Cooperation, The Perils of Government Funding* (Washington, D.C.: Baptist Joint Committee on Public Affairs and The Interfaith Alliance, 2001), p. 2.

² *In Good Faith: A Dialogue on Government Funding of Faith-Based Social Services* (Philadelphia: Temple University, 2001), p. 3.

³ *Keeping the Faith*, p. 5.

⁴ Derek Davis, "Right Motive, Wrong Method: Thoughts on the Constitutionality of Charitable Choice," in *Welfare Reform & Faith-Based Organizations*, ed. Derek Davis and Barry Hankins (Waco, TX: Baylor University J. M. Dawson Institute of Church-State Studies, 1999), p. 270.

⁵ Ibid.

⁶ See *Therefore*, volume 9, number 5.

⁷ Melissa Rogers, "The Wrong Way to do Right: Charitable Choice and Churches," in *Welfare Reform & Faith-Based Organizations*, ed. Derek Davis and Barry Hankins (Waco, TX: Baylor University J. M. Dawson Institute of Church-State Studies, 1999), p. 63.

⁸ Ibid., pp. 63-64.

⁹ Ibid., pp. 64-65.

¹⁰ Ibid., p. 65.

¹¹ Ibid.

¹² Richard R. Hammer, *Pastor, Church & Law*, 5th ed. (Matthews, NC: Christian Ministry Resources, 1991), p. 592.

¹³ Rogers, "The Wrong Way to do Right," p. 65.

¹⁴ Ibid., pp. 65-66.

¹⁵ Ibid., p. 66.

¹⁶ Ibid., p. 68.

¹⁷ Ibid., p. 70.

¹⁸ Ronald L. Trowbridge, "Devil's Deal," *National Review*, 15 September 1997, pp. 58-59.

¹⁹ Rogers, "The Wrong Way to do Right," p. 67.

²⁰ Ibid.

²¹ Ibid., p. 71.

²² Ibid., p. 72.

²³ Joe Loconte, "The Seven Deadly Sins of Government Funding for Private Charities," *Policy Review* (March-April 1997): 28.

²⁴ Ibid., p. 32.

²⁵ A. William Merrell, "Baptist entities should not consider using tax funds for their ministries," *Light* (Newsletter of the Southern Baptist Ethics and Religious Liberty Commission) (January-February 1996): p. 9.

²⁶ Rogers, "The Wrong Way to do Right," p. 67.

²⁷ Ibid., pp. 75-76.

²⁸ Ibid., p. 74.

²⁹ Ibid., p. 75.

³⁰ Ibid., p. 76.

³¹ Davis, "Right Motive, Wrong Method," p. 287.

³² Thomas Jefferson, *Statute for Religious Freedom*, in *The Papers of Thomas Jefferson*, ed. Julian P. Boyd (Princeton, NJ: Princeton University Press, 1950), 2:545.

³³ Rogers, "The Wrong Way to do Right," p. 72.

³⁴ Davis, "Mitchell v. Helms: The Subtle Dangers of Neutrality Theory Unleashed," pp. 14-16. Dr. Davis' paper will appear as a chapter in the soon-to-be-published *Neutrality Theory Debated* (tentative) edited by Stephen Monsma (Lanham, MD: Rowman and Littlefield, 2001).

³⁵ Ibid.

³⁶ Rogers, "The Wrong Way to do Right," p. 77.

³⁷ *Keeping the Faith*, pp. 8-13.

³⁸ Rogers, "The Wrong Way to do Right," pp. 78-79.

³⁹ *Keeping the Faith*, p. 2.

⁴⁰ Davis, "Right Motive, Wrong Method," p. 288-89.

Therefore is the periodic publication of the Christian Life Commission of the Baptist General Convention of Texas, 333 N. Washington, Dallas, TX 75246-1798; (214) 828-5190, (214) 828-5187, fax; e-mail: haag@bgct.org.

Therefore is published eight times per year and is distributed free of charge. H. Joseph Haag, editor; Phil D. Strickland, director.

THEREFORE...

Baptist General Convention of Texas
Christian Life Commission
333 N. Washington Dallas, TX 75246-1798

Non-Profit Org.
U.S. Postage
PAID
Permit 1276
Dallas, Texas

This publication is made possible through your gifts given through the Cooperative Program.