

# **A Commitment to Integrity Code of Ethics and Conduct**



**American Indian College Fund  
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# Section I

## A Message from the American Indian College Fund's Board of Trustees

As Trustees, we are proud to be affiliated with the American Indian College Fund (Fund). It is a vital organization with a crucial vision. It has helped so many tribal colleges and students, and will assist so many more in the decades to come. It has and will continue to have a substantial positive impact on Indian Country.

The Fund's mission is important and worthy. It is a mission that demands that we achieve – and maintain – the very highest level of public trust and accountability.

*We must, at all times, be worthy of the trust placed in us.*

We have developed “A Commitment to Integrity: Code of Ethics and Conduct” to assist all of us in fulfilling our ethical obligations. The standards in this Code of Ethics and Conduct call upon us to reach deep within ourselves and act with integrity, to put service before self, to achieve excellence in all we do. It provides a strong and disciplined set of standards and guidelines to help us do the right thing. The Code of Ethics and Conduct applies to all of us.

We are committed to ensuring that these standards reflect and define the operating culture of the Fund. Please embrace both the letter and spirit of this Code of Ethics and Conduct.

Of course, no document or set of standards can answer all questions. As such, we have established an Ethics Subcommittee within the Nominating & Nominating & Governance Committee to monitor our code of Ethics and Conduct. The subcommittee will help ensure that all of our efforts exemplify the very highest professional, moral and ethical standards. If you have a question as to whether something is ethical or proper, talk to the Fund's Staff Liaison, the Chief Finance & Operations Officer, or contact the Ethics Subcommittee.

The Fund's Ethics Subcommittee and appointed Staff Liaison, the Chief Finance & Operations Officer, will work to continuously monitor and improve our organizational behavior, and will make regular reports to the Fund's Board of Trustees.

## **Section II**

### **Introduction**

The mission of the American Indian College Fund (Fund) is to raise scholarship funds for American Indian students at qualified tribal colleges and universities and to generate broad awareness of those institutions and the Fund itself. The organization also raises resources for other needs at the schools, including capital projects, operations, endowments and/or program initiatives, and it will conduct fund-raising and related activities for any other Board-directed initiatives.

We are committed to fulfilling this mission while practicing the highest ethical standards. We are faithful to the key principles of honesty, integrity, service above self and excellence in all we do—We are devoted to doing the right thing and doing things right, and being an organization worthy of the utmost trust . Within the Fund and with the public.

*Because of the unique level of trust placed in the Fund to serve the public good, we have a special obligation to act ethically.*

“A Commitment to Integrity: Code of Ethics and Conduct” is a way of expressing and institutionalizing our ethical obligations to ourselves and our donors, as well as to the individuals, communities and society we serve. The Code of Ethics and Conduct is a pact calling all of us to embrace the highest ethical standards possible – a promise that will benefit us personally and professionally as well as help to advance the vital mission of the Fund.

A Commitment to Integrity is divided into eight central sections:

- Letter from the Fund’s Board of Trustees
- Introduction
- Key Principles
- Statement of Core Standards
- Standards
- Ethics Subcommittee and Chief Finance & Operations Officer
- Glossary
- Certificate

This “Introduction” is designed to introduce the Code of Ethics and Conduct to you, outline its basic sections, clarify our responsibilities as well as illuminate the vital importance of the Code of Ethics and Conduct to each of us individually – and collectively – in helping to fulfill the promise of our mission.

- The “Key Principles” outline the overarching principles that everyone affiliated with the Fund are asked to keep in mind at all times. Where a situation is not covered by a Core Standard or Standard, the Key Principles should be applied to determine the appropriate course of conduct.

- The “Fund Core Standards” apply to every Fund Board member, employee and volunteer. Each core standard is an imperative with explicit rules under each. The Core Standards are independent and reinforce or clarify each other.
- The “Standards” section provides more detailed rules to govern your actions and decisions. Collectively, the Code of Ethics and Conduct has the force of the official policy of the Fund, and breaches of the Code of Ethics and Conduct, appropriately determined, can serve as a basis for disciplinary sanctions up to and including the termination of an individual’s relationship with the Fund.
- The “Glossary” is designed to assist those making use of the Code of Ethics and Conduct to more fully understand the meanings of a number of the key terms or phrases that have been utilized throughout the Code of Ethics and Conduct.
- The “Ethics Subcommittee and Chief Finance & Operations Officer” section is vital to understanding the management system implementing the provisions of the Code of Ethics and Conduct and how to get help concerning the Code of Ethics and Conduct’s applicability to any given situation. The Fund’s Staff Liaison, the Chief Operations Officer, is a critical resource in aiding all employees and volunteers to fully understand, interpret and implement the Code of Ethics and Conduct.
- Lastly, the “Certificate” is the binding pledge that each of us makes annually to abide by the Code of Ethics and Conduct and its provisions – by signing our name.

It is the responsibility of all Fund employees, trustees and volunteers to follow the Code of Ethics and Conduct. If there is any doubt concerning the applicability of a Core Standard to a particular situation, individuals must contact the Staff Liaison ( or if the Staff Liaison is perceived to have a conflict of interest, a member of the Ethics Subcommittee) to seek guidance.

It is the personal responsibility of each employee, trustee and volunteer to bring violations or suspected violations of the Code of Ethics and Conduct to the attention of the Staff Liaison or Ethics Subcommittee, as appropriate. Direct or indirect retaliation for the making of any such communication is an independent violation of the Code of Ethics and Conduct and will not be tolerated.

If you have any questions, please discuss them with the Staff Liaison. Working together – and fostering honesty, integrity, service before self and excellence in all we do – we will not only succeed but also reinforce the vital bonds of trust that make us the American Indian College Fund.

## **Section III**

### **Key Principles**

Four overarching principles help to define our conduct in everything that we do on behalf of the Fund and its mission. When a specific core standard does not address a particular circumstance or question you may have, or when you may be unable to seek guidance from the Fund's Chief Finance & Operations Officer, you are asked to view the issue through the lens of the following four key principles:

#### **A Commitment to Integrity**

Integrity is a central value any person or entity must have in order to act ethically. It is an inner compass that helps steer each of us in an appropriate and ethical direction. It is a matter of character that helps us, personally and professionally, act with conviction and courage even in the face of adversity.

#### **A Commitment to Honesty**

Honesty is both an overarching and a basic, core value that we hold at the Fund. It means truthfulness, being honorable in all intentions and actions, being respectable and acting with uprightness. It implies being fair, sincere, frank, open and candid. It means that we are genuine and forthright, and therefore eminently worthy of the public's trust and support.

#### **A Commitment to Service**

Service before self is about how working towards the mission takes precedence over our personal desires. It is about ensuring that we always act in a manner consistent with the idea that the very reason we are here is to serve the American Indian Higher Education community and American Indian students.

#### **A Commitment to Excellence**

Excellence is about maintaining high standards and a passion for constantly seeking to improve everything we do on behalf of the Fund. It is about personal, professional, organizational, operational and service excellence on behalf of the communities we serve.

## **Section IV**

### **Statement of Fund Core Standards**

**1. Integrity**

- ❖ We will act with personal and professional integrity.

**2. Honesty**

- ❖ We will act with complete honesty in all of our activities.

**3. Respect**

- ❖ We will respect others and support and protect diversity.

**4. Loyalty**

- ❖ We will be loyal to the Fund and its mission.

**5. Confidentiality**

- ❖ We will protect confidential information.

**6. Responsibility**

- ❖ We will manage our resources in a responsible manner, thus maximizing our ability to advance the mission of the organization.

**7. Transparency**

- ❖ We will be open and candid about our activities and operations.

**8. Governance**

- ❖ We will govern competently and consistently to advance the mission of the Fund.

**9. Compliance**

- ❖ We will comply with our Code of Ethics and Conduct, the rules and regulations of the Fund as well as both the letter and spirit of all federal, tribal, state and local laws.

**10. Duty**

- ❖ We will seek guidance concerning and appropriately report breaches to our Code of Ethics and Conduct.

## **Section V**

### **Standards**

**Core Standard One - Integrity**  
**We will act with personal and professional integrity.**

- 1.1 We will adhere to the principle and standards identified in the Code of Ethics and Conduct and all Fund policies and procedures.
- 1.2 We will be accurate, fair and timely in our communications. We will communicate candidly, honestly and openly.
- 1.3 We will strive to achieve the highest standards of performance, service and excellence.
- 1.4 We will have the courage to suggest improvements when circumstances warrant it.
- 1.5 We will keep our promises.
- 1.6 We will not in any way embarrass or discredit the organization, or otherwise bring disdain or punishment to the organization.

**Core Standard Two - Honesty**  
**We will act with complete honesty in all of our activities.**

- 2.1 We will exercise total honesty in all we do for the Fund, involving, but not limited to, representations made for fund-raising purposes, spending or distribution of funds, disseminating information, administration of the organization and adherence to employee policies.
- 2.2 We will effectively and efficiently use the organization's resources - cash, investments, equipment, real estate, personnel and office supplies and materials - to fulfill the Fund's mission. We will not convert any of the Fund's resources, including work time, to personal gain.
- 2.3 We will not lie, deceive, mislead, misrepresent, in any communication, whether written or verbal, including official communications and non-official interpersonal interactions with others within or outside the organization.

**Core Standard Three - Respect**  
**We will respect others and support and protect diversity.**

- 3.1 We will treat others equitably and respectfully in all aspects of our activities without regard to race, color, religion, creed, age, sex, national origin or ancestry, marital status, veteran status, sexual orientation, or status as a disabled individual.
- 3.2 We will support equal opportunity in hiring and employment practices.
- 3.3 We will not engage in any discrimination or harassment.
- 3.4 We will consider and respect diverse points of view.
- 3.5 We will hold in the highest esteem the needs of our constituents.

**Core Standard Four - Loyalty**  
**We will be loyal to the Fund and its mission.**

- 4.1 We will be loyal to the Fund and its mission—not to any particular individual or group of individuals. We will not engage in any conduct that would undermine the public’s trust or would tarnish the reputation of the Fund. We will not engage in any activity or relationship that would create a potential or actual conflict of interest that would adversely affect our ability to faithfully and loyally perform our service to the Fund.
- 4.2 We will not solicit or coerce the offering of a personal gift. We will not accept a gift that is given for the purpose of influencing decisions and actions of the Fund, or that a reasonable person would conclude is for this purpose.
- 4.3 The Fund will not employ family members of existing employees or volunteers except if there are special circumstances that are in the best interests of the Fund, as determined by the Board of Trustees. We will not have management or supervisory authority over a family member.
- 4.4 We will ensure that any outside employment does not interfere with our responsibilities to the Fund and does not adversely affect the organization or its mission. We will inform our manager of any significant outside activities that might impact our Fund responsibilities.
- 4.5 We will disqualify ourselves from a particular matter that, to our knowledge, has an impact on the financial interests of a prospective employer. We will inform our manager and take whatever steps are necessary to ensure that we are not personally and substantially participating in the matter related to a prospective employer. Disqualification is, therefore,



accomplished in most cases by (1) not participating in the particular matter, (2) notification to our manager and, (3) communications to our co-workers regarding our disqualification.

- 4.6 We will not use our position at the Fund for private gain, for the endorsement of any product, or for the private gain of any service or enterprise, friends, family members, or persons with whom the employee or volunteer is affiliated. We will not endorse a particular candidate or political party on behalf of the Fund.
- 4.7 We are aware that our duty to not disclose confidential information continues even after our employment ends. We will not use confidential information gained in the course of our employment or volunteer efforts for our own personal gain or the gain of another either during or after our relationship with the fund ends.
- 4.8 We will treat vendors fairly and avoid favoritism. We will offer vendors the opportunity to offer or qualify their products or services on a fair competitive basis. We will refrain from influencing the selection of vendors who are family members or personal friends or are affiliated with, employ, or are employed by a person with whom they have a relationship that would create potential or real conflict of interest.
- 4.9 We will make full disclosure of all potential and actual conflicts of interest. We will abide by the operative rule of thumb: “when in doubt – disclose.”

<p><b>Core Standard Five - Confidentiality</b> <b>We will protect confidential information.</b></p>
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- 5.1 We will not disclose to an unauthorized individual or organization without the consent of the Fund any confidential, privileged or nonpublic information entrusted to us.
- 5.2 We will respect the privacy of others and private information.
- 5.3 We will recognize that all information, whether hard copy or electronic, is the property of the Fund and may not be copied or removed without express permission of the Fund.
- 5.4 We will require that all employees, volunteers and relevant vendors sign a “confidentiality statement” as a condition of their employment or service with the Fund.
- 5.5 We will prohibit all employees and volunteers from engaging in any financial transaction using non-public or confidential information to further their own private interests.
- 5.6 We will justify the reliance that donors, corporations, foundations and others have in our ability to utilize and manage information with the highest degree of confidentiality by adopting reasonable safeguards to protect our computer and management information systems from unauthorized use.

- 5.7 We will respect the privacy of donors and safeguard the confidentiality of information that a donor reasonably would expect to be private.
- 5.8 We will respect the wishes of donors who may prefer to remain anonymous. We will not publicly release the names, addresses or amounts of their gifts, unless required to do so by law.
- 5.9 We will make the annual IRS Form 990 tax return and exempt application of the Fund available for public inspection, as required by law. In doing so, we will ensure that the portions of the Form 990 tax return that are not available for public inspection are so designated.
- 5.10 When providing information to the media, we have an obligation to report accurately and completely all relevant facts.

**Core Standard Six - Responsibility**  
**We will manage our resources in a responsible manner maximizing our ability to advance the mission of the organization.**

- 6.1 We will maintain accurate financial records and report our financial results in an accurate and timely manner.
- 6.2 We will be honest and faithful fiduciaries and protect the public funds entrusted to us.
- 6.3 We will use the resources; equipment and materials of the Fund only for the necessary performance of our duties to further the Fund's mission.
- 6.4 We will comply with all limitations on incurring expenses in the course of authorized activities for the Fund and will not seek or receive reimbursement for expenses not incurred.
- 6.5 We will adopt a procedure for the selection of outside vendors that ensures a fair price and avoids any conflict of interest.
- 6.6 In providing services, we will establish clear, publicly- stated criteria concerning how these services are provided.
- 6.7 We will not allow a candidate for office, a political party, or any organization advocating a candidate or political party to use Fund resources.
- 6.8 We will provide employees and volunteers with a confidential means to report suspected financial impropriety or misuse of the Fund's resources.
- 6.9 We will establish an Ethics Subcommittee, comprised of three members of the Board of Trustees, and a non-voting Staff Liaison, all of whom are approved by the Board. The Ethics

Subcommittee will oversee the work of the Fund's Staff Liaison and serve as a review, coordinating and appeals body for ethics issues concerning the organization and its work.

- 6.10** In a situation where action or decision by management or the Staff Liaison would involve a conflict of interest for the Staff Liaison, as determined by the Ethic's Subcommittee, the Ethic's Subcommittee will review and decide the matter in the first instance. In all other circumstances, the Staff Liaison will review and decide the matter in the first instance.

**Core Standard Seven - Transparency**  
**We will be open and candid about our activities and operations.**

- 7.1** We will openly, candidly and transparently report on our activities and operations.
- 7.2** We will provide members of the public who express an interest in the affairs of the organization with a meaningful opportunity to communicate with an appropriate representative of the Fund.
- 7.3** We will make available for public inspection a copy of our annual report and our most recent IRS Form 990 filings, as well as a copy of our exempt status application. In doing so, we will ensure that the portions of the Form 990 tax return that are not available for public inspection are so designated.

**Core Standard Eight - Governance**  
**We will govern competently and consistently in order  
to advance the mission of the Fund.**

- 8.1** We will commit ourselves to the mission of the Fund and competently, efficiently and professionally perform the duties and tasks necessary to provide exceptional service to our constituents.
- 8.2** We will work cooperatively with each other, always striving to be – or become – genuinely united in our actions and decisions.
- 8.3** We will follow the by-laws approved by the Board.
- 8.4** We will honor the democratic process and support the final decisions of the Board.
- 8.5** We will fully and candidly discuss issues entrusted to us and respect others' viewpoints.
- 8.6** We will invest in the education and training of our Board, employees and volunteers as a means of ensuring excellence in operations, service and programs.
- 8.7** We will ensure that we are competent to accomplish the tasks assigned to us and, if not sufficiently competent, will ask for assistance and become competent.
- 8.8** We will actively seek qualified candidates for vacant Board, Staff and Volunteer positions,

**Core Standard Nine - Compliance**  
**We will comply with our Code of Ethics and Conduct,**  
**the rules and regulations of the Fund,**  
**as well as all applicable federal, state and local laws.**

- 9.1** We will establish and implement systems to ensure that we comply with all applicable federal, state and local laws.
- 9.2** We will specifically designate the Staff Liaison as our compliance officer with the specific responsibility for assisting, educating or training everyone to comply with all applicable federal, state and local laws and regulations.
- 9.3** We will periodically conduct an internal review of our compliance with known existing legal, regulatory and financial reporting requirements and provide a report of the results to the Board of Trustees.

**Core Standard Ten - Duty**  
**We will seek guidance concerning and appropriately report breaches**  
**to our Code of Ethics and Conduct.**

- 10.1** We will report potential or actual breaches of the Code of Ethics and Conduct to the Staff Liaison, or, in cases where the Staff Liaison has a perceived conflict of interest, to the Ethics Subcommittee.
- 10.2** We will treat reports of potential or actual breaches of the Code of Ethics and Conduct or laws as confidentially as the law will allow. If absolute confidentiality cannot be maintained, the individual disclosing the potential or actual breach will be notified.
- 10.3** Retaliation against an individual or group who reports a potential or actual breach of the Code of Ethics and Conduct is an independent violation of this Code of Ethics and Conduct and will not be tolerated.
- 10.4** We will make all reasonable efforts to fairly, and in a timely manner, investigate and resolve all reports concerning potential or actual breaches of the Code of Ethics and Conduct.

## **Section VI**

### **Ethics Subcommittee and Chief Finance & Operations Officer**

To implement and serve as a central resource concerning and the Code of Ethics and Conduct, the Board of Trustees has created an Ethics Subcommittee within the Nominating & Governance Committee. The Ethics Subcommittee reports directly to the Nominating & Governance Committee and consists of three Board members from the Nominating & Governance Committee, a non-voting Staff Liaison, and the Fund's lawyer, all of whom are approved by the Board.

The central role of the Staff Liaison, the Chief Finance & Operations Officer, is to:

- Serve as senior staff to the Ethics Subcommittee.
- Serve as a source of guidance regarding the Code of Ethics and Conduct issues.
- Serve as a central and confidential place to report potential and actual breaches of the Code of Ethics and Conduct.
- Investigate – or assign a matter for investigation – and report the results to the Ethics Subcommittee.
- Enforce the Fund Code of Ethics and Conduct.
- Serve as a catalyst to communicate the Code of Ethics and Conduct to the Fund's employees and volunteers as well as to other relevant parties such as donors, vendors, partners, and the public.
- Administer the Code of Ethics and Conduct Certification process.
- Coordinate with the CEO, Board and various departments of the Fund to ensure the integration and implementation of the standards imbedded within the Code of Ethics and Conduct throughout all aspects of the Fund's activities.
- Educate appropriate individuals as to the Fund's ethics related policies and procedures.
- Manage and oversee all aspects of the Code of Ethics and Conduct including its dissemination, amendment, interpretation as well as training concerning its contents and implications.

The central role of the Fund's Ethics Subcommittee is to:

- Report to the Board on the ethics activities and issues of the Fund
- Have the power, as an instrument of the Board, to enforce the Fund's Code of Ethics and Conduct.
- Oversee and evaluate the work of the Fund's Staff Liaison.
- Recommend to the Board candidates for the position of the Fund's Staff Liaison should the position become vacant.
- In conjunction with Fund leadership, establish appropriate policies and procedures for the management of the Fund's ethics effort and the activities of the Staff Liaison and the Ethics Subcommittee itself.
- Conduct an evaluation of – and recommend modifications, amendments or examples to – the Code of Ethics and Conduct on at least a biennial basis.
- Serve as an appeals body for employees, volunteers or others who wish to have a review of an action or decision by Management or the Staff Liaison as it pertains to the Fund's Code of Ethics and Conduct. All decision by the Ethics Subcommittee on appeals will be final.
- In a situation where action or decision by management or the Staff Liaison would involve a conflict of interest for the Staff Liaison, as determined by the Ethic's Subcommittee, the Ethic's Subcommittee will review and decide the matter in the first instance. In all other circumstances, the Staff Liaison will review and decide the matter in the first instance.

## Section VII

### Glossary

Confidential Information: nonpublic, proprietary, private or secret information preserved by the Fund.

Donor: individuals and entities that make charitable or in-kind contributions to the Fund.

Employee: anyone who acts in a staff capacity and provides services to the Fund on a full, part-time or leased basis.

Ethics Subcommittee: a group of five individuals (three from the Board of Trustees, one Staff Liaison, and the Fund's Lawyer) responsible for enforcing the Fund's Code of Ethics and Conduct, overseeing the work of the Staff Liaison and reporting to the Board the ethics activities of the Fund. (See also Section VI.)

Family Member: persons who are related to Fund employees or volunteers by blood or by marriage, or in other significant ways (e.g. significant other, life partner, common-law marriage, etc.)

Gift: any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, or other item having monetary value. It includes services as well as gifts of training, transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred. It does not include:

1. Modest items of food and refreshments, such as soft drinks, coffee and donuts, offered other than as part of a meal.
2. Greeting cards and items with little intrinsic value, such as plaques, certificates, and trophies, which are intended solely for presentation.
3. Loans from banks and other financial institutions on terms generally available to the public.
4. Opportunities and benefits, including favorable rates and commercial discounts, available to the public, whether or not restricted on the basis of geographic considerations.
5. Rewards and prizes given to competitors in contests or events, including random drawings, open to the public unless the employee's entry into the contest or event is required as part of his/her official duties.
6. Pension and other benefits resulting from continued participation in an employee welfare and benefits plan maintained by a former employer.
7. Anything for which market value is paid by the employee.

Manager: anyone at the Fund (employee or volunteer) who has supervisory responsibilities over others.

Nonpublic Information: Any business, financial, or personal information that is not widely known or publicly available.

Privileged Information: a communication that is protected from disclosure by legally recognized privileges such as attorney-client, doctor-patient, and others.

Staff Liaison: serves as a senior source of guidance and information concerning the Fund Code of Ethics and Conduct and reports directly to the Ethics Subcommittee. (See also Section VI.)

Vendor: an individual or entity that provides services to the Fund for a fee.

Voluntary Act: an intentional action or decision made without coercion or duress.

Volunteer: all members of the Board, Board Committees and the many others who perform their duties without compensation.

## Section VIII Code of Ethics and Conduct Certificate— Employee, Volunteers & Board Members



I acknowledge that I have received and read my personal copy of the American Indian College Fund’s “A Commitment to Integrity: Code of Ethics and Conduct.” I understand that it is the responsibility for all of the Fund’s employees and volunteers to comply with the Code of Ethics and Conduct as the Fund’s Board of Trustees has adopted it as the official policy of the organization. Furthermore, I understand that if there is any doubt concerning the applicability of the Standards or Guidelines to a particular situation, before I take any action I am to make contact with the Fund’s Staff Liaison, the Chief Operations Officer, or the Ethics Subcommittee to seek guidance.

I further understand it is my responsibility to bring violations or suspected violations of the Code of Ethics and Conduct to the attention of Fund’s Staff Liaison, the Chief Operations Officer, or the Ethic’s Subcommittee. I have also been informed that any direct or indirect retribution for the making of a communication concerning violations or suspected violations of the Code of Ethics and Conduct is itself an independent violation of the Code of Ethics and Conduct unless the communication itself is a violation of the Code of Ethics and Conduct.

The Certification process is mandatory for all the Fund’s Board Members, employees and volunteers.

**I will conduct myself in accordance with the Fund’s Code of Ethics and Conduct during my association with the Fund and I pledge to abide by the Fund’s Code of Ethics and Conduct:**

_____	( )
Typed or Printed Name	Tel. No.
_____	/ /
Signature	Date

**Please return this certificate directly to the Fund’s Staff Liaison at the following location:**

Tamela Miller-Carlson, Chief Finance & Operations Officer  
Code of Ethics and Conduct Certificate  
American Indian College Fund  
8333 Greenwood Boulevard  
Denver, CO 80221

**Questions?** Phone Tamela Miller-Carlson, Chief Finance & Operations Officer at 303-426-8900  
E-mail: [tcarlson@collegefund.org](mailto:tcarlson@collegefund.org)