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Investing in the Best

How to Support the Nonprofits that Serve Veterans, Service Members and Their Families

By Nancy Berglass



**Center for a
New American
Security**

Fifth Anniversary

About the Report

This report revises and updates work the author developed as Director of the California Community Foundation's (CCF) Iraq Afghanistan Deployment Impact Fund; that work was originally published in CCF's 2009 report, "Supporting Our Troops, Veterans and Their Families: Lessons Learned and Opportunities for Philanthropy: A Report on the Iraq Afghanistan Deployment Impact Fund of the California Community Foundation" by Vanessa Williamson. The Center for a New American Security (CNAS) gratefully acknowledges CCF for its generous support of this project. Thank you also to Kristin Lord, Meg Harrell and the many other thoughtful and generous reviewers at CNAS, whose keen insights helped strengthen this report. Additionally, the author is grateful to CNAS colleague Liz Fontaine, for designing a fine presentation.

"Investing in the Best" is a product of the Joining Forces project of the Military, Veterans and Society Program at CNAS. The Joining Forces project includes a range of research, analysis and convening activities that explore the impact of military service upon, the deployment-related needs of, and the ways in which the country can best support its service members, veterans and their families. This work complements and may inform, but is conducted independently from, the White House initiative of the same name.

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Cover Image

Volunteers work to build a house being donated to Dylan Gray, a Marine veteran amputee, after a wall raising ceremony March 11, 2011, in Wellington, Nev.

(LANCE CPL. SARAH ANDERSON/U.S. Marines)

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About the Author

Nancy Berglass is a Non-Resident Senior Fellow at the Center for a New American Security, the Director of the Iraq Afghanistan Deployment Impact Fund and Principal of Berglass Community Investment Consulting.



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THE NONPROFITS THAT SERVE VETERANS,
SERVICE MEMBERS AND THEIR FAMILIES

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Over 2.4 million men and women who have fought the most protracted wars in American history are coming home to rejoin their families, neighborhoods, workplaces and communities.¹ Most will return with skills and talents that will enhance the quality of life in their communities and continue to serve the nation. Some will bear scars both visible and invisible, and face needs that were previously unknown. For those veterans and their families who need support, a broad range of nonprofit organizations stands ready to help.

Yet, donors who wish to support the most effective organizations that help meet the needs of veterans and the military community face a staggering array of choices. There are over 40,000 nonprofit organizations in the United States with missions that specifically focus on the needs of service members, veterans and their families.² Meanwhile, thousands of organizations with broader aims also offer programs that serve this population. Given this range, it can be difficult to determine which organizations operate most effectively and would best serve veterans, given additional philanthropic support.

Philanthropic intervention in military and veteran support does not excuse the government from its responsibilities to those who serve. On the contrary, the Departments of Defense and Veterans Affairs bear primary responsibility for service members and veterans, and both should be held accountable for inadequacies that have left many individuals, families and communities overwhelmed by unmet service-related needs.³ Recently, both departments have made promising changes to service member and veteran care that could lead to systemic improvement over the longer term. Still, the task ahead is urgent and enormous and will remain beyond federal agencies' capacity to address fully for generations to come.

A new paradigm for veteran care must call upon a new slate of stakeholders – grantmakers, businesses and nonprofits alongside and in partnership

with government agencies – to work cooperatively in order to meet the service-related needs of those who have worn the nation’s uniform. Philanthropic players from the public and private sectors alike can use their resources as conveners, civic power brokers and funders to identify, nurture and uphold the best of the community organizations able to work effectively in this way.

There will be challenges ahead. Some groups with genuine charitable intent will lack the experience, knowledge or evidence-based judgment to provide the necessary services to veterans and military communities effectively and efficiently. Driven by good intentions, some might even do harm when they mean only to help. Regrettably, these communities are also vulnerable to scams, predators and opportunists positioned to exploit for personal gain what former Chairman of the Joint Chiefs of Staff ADM Michael Mullen identified as the public’s “Sea of Goodwill” toward its men and women in uniform.⁴ It is incumbent upon all donors interested in supporting service members, veterans and their families to become well-informed.

This report recommends criteria that both public and private partners can use to assess whether particular nonprofit organizations that serve military or veteran communities merit investment. The first two sections provide criteria for assessing basic nonprofit compliance and programs that support veterans and military communities broadly, and will be most useful for those who have little experience with grantmaking. The third section provides additional criteria for assessing organizations that serve veterans of post-9/11 conflicts in particular⁵ and will be useful to all interested donors, regardless of their previous grantmaking experience. These criteria are not exhaustive; all philanthropic entities – whether individual, family-based, corporate or institutional – looking to fund or otherwise partner with nonprofit organizations in this field should develop additional criteria based on their own objectives, values and protocols.

I: Basic Due Diligence for All Nonprofit Organizations

To a large extent, vetting nonprofits that serve America’s service members is no different than assessing any other nonprofit organization. As a first step to any organizational review, any individual, grantmaking foundation or government agency that invests in nonprofits needs to establish that potential grantees meet baseline standards for compliance and quality. Basic due diligence requires verifying that the organization complies with state and federal rules and regulations, adheres to generally accepted standards for excellence in nonprofit management and has a clearly articulated mission for its programs and services. Beyond the basics, however, there is as much art to effective philanthropy as there is science; informed donors should always begin with baseline measures of compliance and then move toward deeper and more nuanced examinations of the organizations in which they may invest.

Two levels of baseline compliance review are discussed here. Compliance “resources” are quick and easy tools that donors can use to establish reliably that a given organization is a nonprofit in good standing with the Internal Revenue Service (IRS), or to review its general financial status. Potential donors may ask nonprofits that pass this first test to submit organizational documents, letters of intent or grant applications, which, as a second test, demonstrate adherence to what is referred to here as “compliance criteria.”

COMPLIANCE RESOURCES

Individual and institutional donors alike should use resources that offer a good baseline assessment of the nonprofits under consideration. These resources include, among others, the Better Business Bureau’s (BBB) Wise Giving Alliance, Charity Navigator and Guidestar. Although none of these resources list every nonprofit that exists, and none examine the more “artful” criteria that are best considered through grant applications and

site visits⁶ (see below), all publish clear and cogent assessments of the extent to which nearly 2 million nonprofits – many of which serve the military and veteran communities – comply with general standards for financial, legal, management and governance and accountability. All three publish their own criteria and methodologies, which differ enough to complement each other and thus may merit collective review.

- **BBB Wise Giving Alliance**

The BBB Wise Giving website allows the user to search for a nonprofit organization and access a brief report that assesses its compliance with basic legal standards and best practices. BBB Wise Giving's standards “seek to encourage fair and honest solicitation practices, to promote ethical conduct by charitable organizations and to advance support of philanthropy” by assessing how nonprofits govern their organizations, spend their money, impart truthfulness in their representations and disclose basic information to the public.⁷

- **Charity Navigator**

Charity Navigator provides extensive reports on over 1.5 million nonprofit organizations. In addition to assessments of several factors pertaining to financial and governance compliance, Charity Navigator also prepares profiles on the mission, executive compensation and revenues and expenses of those they study.⁸

- **Guidestar**

Guidestar's mission is “to revolutionize philanthropy and nonprofit practice by providing information that advances transparency, enables users to make better decisions and encourages charitable giving.” Users can access brief reports about an organization's current status of compliance with IRS rules and regulations, as well as its financial history. Guidestar also has a “reviewer” function that allows individuals to comment on an organization's performance. For a fee,

Guidestar provides more in-depth information, from reporting and analysis of executive compensation to an overview of programs.⁹

Although no donor should make decisions based solely on these reports, a positive report from BBB Wise Giving, Charity Navigator or Guidestar may indicate that further investigation of, and possible investment in, a given nonprofit is worthwhile. By contrast, a negative report should raise significant questions and possibly encourage the donor to look elsewhere.

Because many organizations serving the military and veteran communities are young, it is likely that some established within the past year or two may not yet appear on these websites. Moreover, those with gross annual receipts of less than \$50,000 may not yet have filed IRS Form 990, further complicating a donor's capacity to conduct basic due diligence. In these cases, potential donors should use the assessment criteria offered below (or those made available on these “watchdog” websites) to independently determine the basic compliance of individual organizations.

COMPLIANCE CRITERIA

Either in addition or as an alternative to the compliance tools noted above, donors should require that applicant nonprofit organizations demonstrate several compliance criteria in order to be considered for grant support:

- **501(c)(3) status as determined by the IRS.**

Nonprofit organizations should be able to provide a valid 501(c)(3) nonprofit determination letter from the IRS. However, donors should also confirm the organization's current standing with the IRS to ensure that it is up to date with annual tax filings. This can be done by searching a nonprofit organization's status using the free IRS “Exempt Organizations Select Check” service, which includes current data and will indicate whether an organization's tax-exempt status has been revoked.¹⁰

- **Compliance with IRS rules and regulations regarding financial reporting.** Credible non-profit organizations should demonstrate that IRS Form 990 has been filed on time and correctly for a period of at least the two most recent years (note that some new and emerging organizations, of which there are many in this field, have not yet been required to do so).
- **Consistent internal financial accounting** that indicates:
 - » Reasonable expenses and revenues (If expenses exceed revenues for more than one year, can the organization produce a viable turn-around plan?);
 - » Proportionate expenses, assets and liabilities;¹¹
 - » Executive compensation, salary and other administrative expenses that are in line with trends in the field and proportionate to the overall budget;
 - » A consistent application of contributed revenues to the purpose for which they were intended; and
 - » Compliance with generally accepted standards for bookkeeping (Is the organization able to produce actual account ledgers or other financial statements, as opposed to written documents that “explain” finances?).
- **Compliance with basic tenets of nonprofit governance.** The organization should be able to provide the following documentation:
 - » Articles of Incorporation filed with the state in which the organization is incorporated;
 - » Professionally drafted by-laws;
 - » A board of directors whose size complies with by-laws and state regulations;
 - » A board of directors roster with names and professional affiliations;
 - » Standards and rules governing board roles and

- responsibilities, including conflict-of-interest statements;
 - » Notes of regular board meetings (minutes signed by the Chair); and
 - » Approval by the board of directors of the organization’s submission for funding, if relevant.
 - **Clear and consistent articulation of a mission statement** to which all of the organization’s programs and services aspire.
 - **Strategic or business plans** indicating that the board and director have considered and planned for the organization’s future trajectory.
 - **Communications strategies** that honestly, accurately and transparently portray the organization to its constituents and the public.
 - **Evaluative measures** through which the agency measures its success and plans for advancement.
- Additionally, grantmakers and donors should use letters of intent, grant applications or proposals to ask that applicant organizations demonstrate :
- **A leader or leadership team with the following attributes:**
 - » Deep familiarity with all organizational issues;
 - » Comprehensive knowledge of the field;
 - » Clear understanding and communication of the organization’s mission;
 - » Clear understanding and communication of his/her responsibilities; and
 - » Trust from peers and constituents.
 - **Understanding of and compliance with the rights of and limitations on nonprofits engaging in non-lobbying advocacy,** if advocacy work is involved.¹²

II: Assessing Organizations that Serve Veterans, Service Members and Their Families

Nonprofit organizations that serve veterans and their families fall into three main categories – all of which include some nonprofits that are doing outstanding work, as well others that are less effective.

This section describes the types of organizations that serve veterans and military families broadly, and offers criteria that donors can use to make assessments about the quality and capacity of these organizations to serve their constituents effectively.

TYPES OF VETERAN-SERVING NONPROFIT ORGANIZATIONS

The first of the main groups that serve veterans is the best known but the smallest in number: Veteran Service Organizations (VSOs), such as the American Legion, the USO, Disabled American Veterans and Veterans of Foreign Wars. VSOs are congressionally chartered nonprofits of large national stature. Most were founded before or during the Vietnam War era. Some provide effective services to younger veterans, whereas others have not yet developed effective outreach to or programming for the current generation.

The second group includes the small and mid-sized organizations created to serve military and veteran populations. These nonprofits often receive less attention, but they are more numerous. Many do good work within the communities in which military families live and to which veterans return. They often derive their drive, expertise and commitment from leaders, staff and volunteers who have been directly touched by these wars. However, many of these organizations need technical assistance to keep their organizations as healthy and vibrant as their programming. When needed and appropriate, grantmakers should consider providing resources for management assistance and professional development to grantees in this category, in addition to program or operating support.

The third group includes nonprofits such as hospitals, universities and colleges, shelters, preschools, drug treatment programs and faith-based organizations with missions that do not specifically focus on veterans but are nonetheless essential to the public health and social service infrastructures of most communities. A growing number of these

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organizations have begun to learn more about the needs facing today's veterans, tailoring programs and leveraging resources to create programs for this population. Many face challenges in developing the necessary cultural competence – the capacity of an organization and the individuals who represent it to interact, serve and function authentically within the context of the beliefs, behaviors and needs presented by its constituent base – to address veterans' issues most appropriately and effectively.¹³

To support the best of these organizations, volunteers, donors and grantmakers should make informed choices about how to identify programs that have the most meaningful impact on the lives of veterans and military families. They will also need to think carefully about choosing best-in-class organizations among a crowded field. Duplication is common in the field of veterans' services. This can be acceptable where differing locations or service populations are concerned but detrimental where redundancy results in turf wars, lack of efficacy or in-fighting over limited dollars. In these cases, funders might play a role in helping nonprofit organizations with overlapping agendas to consider coordinating or partnering with each other.

CRITERIA FOR ASSESSING VETERAN-SERVING NONPROFITS

Before engaging with or investing in organizations that serve veterans, donors should examine their

qualifications and capacities to deliver services effectively. To make these determinations, donors should take the following steps:

- **Require potential grantees to submit applications or proposals** that provide evidence of organizational capacity to execute and, if relevant, sustain the program or service for which funding is being sought. Applications and proposals should include both documents that demonstrate compliance with the basic standards outlined above, and information and evidence pertinent to the criteria below.
- **Conduct site visits** or other meetings, when possible, to evaluate the organization’s “human touch” (how staff and leaders interact with constituents or clients) and to further assess program quality and organizational leadership.
- **Examine the organization’s program brochures, materials, websites and social media presence** to see if they corroborate the capabilities portrayed in proposals and site visits.

In written applications and on site visits, applicants should be able to provide evidence and information pertaining to these core assessment criteria:

- **Knowledge of the field and program subject matter**
 - » What issues does the program address?
 - » Who are the constituents? How are they defined? What are their service-related needs?
 - » Who are the stakeholders (the persons and organizations with interests and concerns) in this program and its success? Who are the stakeholders in the fields that more broadly address the people and issues affected by the program, both within and beyond the program’s catchment area? How are they defined?
 - » Do the organization’s staff and leaders know who else is doing similar work at the local, regional and national levels?
 - » Does the organization understand how the

Department of Veterans Affairs works and demonstrate reasonable knowledge of the programs, services and benefits for which some of their clients may eligible?

- » What plans are there to collaborate or coordinate with other programs that may be doing similar or complementary work? Is there an analysis as to why collaboration may or may not be efficacious?
- **Strategy**
 - » What is the organization’s theory of change? How do leaders articulate an understanding of the problem being addressed? What do they identify as the solution? How will this program work toward that solution?
 - » Is there a clear plan with a timeline, milestones and methodology for addressing the problem?
- **Preparation, credibility and planning**
 - » What data or observations justify the program and its approach?
 - » By what measures does the organization consider itself to be qualified to lead the effort?
 - » If new to serving military members, families and veterans, how do staff and leaders anticipate reaching out to and gaining the trust of this population?
 - » How will the organization gain and incorporate knowledge and use it to improve efforts?
 - » If the program deals in mental health or otherwise provides clinical service, on what evidence are the methodologies and services based?
 - » What are the potential risks of this program to constituents? To the organization? To donors?
- **Track record**
 - » Has the organization undertaken this or a similar program before?
 - » What were the results? How did were the effects evaluated?

- » Has the organization documented its success? What lessons from previous efforts inform the current program?
- » How do staff and leaders assess their credibility in the field and trust among constituents?
- » What checks and balances are in place to control quality?
- » If the program deals in mental health or otherwise provides clinical service, on what evidence are the methodologies and services based?
- » Are there peers who can serve as references?
- **Staffing**
 - » How does leadership define the qualifications of personnel who work in this program area? Do they understand the requirements – from licensing to cultural competency – needed to provide effective service to the population at hand?
 - » Is there adequate staffing by qualified personnel?
- **Stakeholder involvement**
 - » Are there veterans or military family members on the staff?
 - » Are there veterans or military family members involved as volunteers, or on the board of directors?
 - » If not, where within the organization do service members and/or veterans have a voice?
 - » If they do not have a voice, why not?
- **Evaluation**
 - » Is there a clear plan to assess progress and address any concerns while the program is being conducted?
 - » How will the overall effort be evaluated?
 - » If the organization will collect data for purposes of evaluation, how will it secure the approval of the subjects, if necessary?

Conduct site visits or other meetings, when possible, to evaluate the organization's "human touch" and to further assess program quality and organizational leadership.

- » How will the information learned be used?
- » What is the organization's capacity to conduct the evaluation described?

III: Evaluating Organizations that Serve Post-9/11 Veterans Specifically

Many excellent organizations serve veterans of all generations, but not all programs address the specific needs of post-9/11 veterans and their families effectively. While many of the issues facing veterans are universal, some of those facing the current generation are unique. Many post-9/11 veterans have served multiple and extended deployments. They have been exposed to repeated bomb blasts and survived injuries that would have killed service members only a generation ago. For members of the Guard and Reserves, more and longer deployments than had been expected have placed significant strain on family and work life at home. The new roles for women in the military have signaled both opportunity and challenge for that population. The nonprofits that best serve post-9/11 veterans provide programming that accounts for these and other attributes of their military experience. In addition to the due diligence and assessment activities described above, donors and grantmakers looking to address the needs of this population specifically should likewise assess the cultural competence of organizations that serve them.

ADDITIONAL CRITERIA FOR ASSESSING NONPROFITS THAT SERVE POST-9/11 VETERANS

Two core factors distinguish an organization's capacity to serve veterans of the post-9/11 generation effectively: cultural competence and the ability to conduct successful outreach to a still-young population that – due largely to stigma – remains reticent to self-identify. To assess organizational understanding of matters pertaining to the conditions and impact of post-9/11 service and deployment on military personnel and their families, additional issues to consider and questions to ask might include, but not be limited to:

- **Knowledge of issues that specifically face veterans of Afghanistan, Iraq and others who have served since 9/11**
 - » Does the applicant understand the unique challenges and circumstances facing this population, as well as the issues it shares with veterans of previous generations?
 - » Does the applicant differentiate among the needs of active component, Reserves and Guard and veteran clients? Of female veterans? Of those who have served multiple deployments?
 - » To what extent are staff members familiar with today's military culture?
 - » How do staff members manage the possibility that some of their clients or members may feel it inappropriate to discuss trauma or admit needing help?
 - » What evaluative measures indicate that pre-established or older programs and services are relevant to today's military population?
 - » What theory of change guides programs and services provided to today's veterans and military families?
- **Successful outreach to recent veterans**
 - » Does the organization have a robust online presence?

- » Does the organization understand why many post-9/11 veterans remain difficult to “find” and serve?
- » If so, what is the plan to identify, earn the trust of and provide needed services to hard-to-reach constituents?

Conclusion

With the end of America's troop presence in Iraq and the continuing drawdown of troops in Afghanistan, many Americans wish to support the service members, veterans and military families who have shouldered a great burden for the nation. This generosity speaks well of America and honors those who have served.

To best address the needs of those who have served the nation, grantmakers should require excellence from the veteran-serving nonprofits they support. Proper due diligence, combined with an investment in learning more about the circumstances and opportunities facing veterans and their families, will yield smart and effective grants that can and will meet the short- and long-term needs of those who have served. By adopting some of the relatively straightforward practices outlined in this report, grantmakers will not only support America's service members, veterans and military families but also demonstrate anew the power of philanthropy to promote social change.

ENDNOTES

1. Department of Labor, Employment Situation of Veterans – 2011, USDL-12-0493 (March 20, 2012), 2, <http://www.bls.gov/news.release/pdf/vet.pdf>.
2. According to the National Center for Charitable Statistics at the Urban Institute, as of March 2012, there were 40,848 nonprofits registered with the Internal Revenue Service that specifically support service members and veterans. To locate this data, submit a data query using the Custom Table Wizard on this webpage: <http://nccs.urban.org/tools/index.cfm>. Then, sort for Registered Nonprofits by NTEE code for March 2012 (the most recent date at time of publication) and input W30 Military & Veterans Organizations for the NTEE coding category.
3. In addition to the Department of Defense and Veteran Affairs, the Department of Homeland Security also bears some responsibility – albeit for a much smaller constituency – as the Coast Guard is a military service organized under DHS. Both active and reserve members of the Coast Guard have served in post-9/11 campaigns.
4. John Copeland and David Sutherland, “Sea of Goodwill: Matching the Donor to the Need” (Office of the Chairman of the Joint Chiefs of Staff, 2010).
5. The author of this report is the director of the Iraq Afghanistan Deployment Impact Fund (IADIF), which, as noted elsewhere in this report, has distributed close to \$250 million to nonprofit organizations involved in supporting the military and veterans. The issues identified here are of concern to organizations, advocates and donors addressing the needs of post-9/11 veterans and are derived from lessons learned from IADIF, its grantees and its peer funders.
6. “Site visits” are meetings in which a donor or grantmaker’s representative(s) goes to the place(s) where the applicant’s activities are conducted to meet with organizational leadership and witness first-hand, when possible, the provision of services. Site visits provide the donor with an excellent opportunity to ask questions, engage in conversations and observe activities and can be more revealing and nuanced than most grant applications or proposals allow.
7. For specific standards by which the BBB Wise Giving Alliance rates nonprofits, see Better Business Bureau Wise Giving Alliance, “Standards for Charity Accountability,” <http://www.bbb.org/us/Charity-Standards/>.
8. See <http://www.charitynavigator.org/>.
9. Guidestar, “About Us,” <http://www2.guidestar.org/rxg/about-us/index.aspx>.
10. To conduct an Exempt Organizations Select Check, visit Internal Revenue Service, “Exempt Organizations Select Check,” <http://www.irs.gov/charities/article/0,,id=249767,00.html>.
11. It is a generally accepted standard within the nonprofit field that program expenses should outweigh administrative (and especially fundraising) expenses. The nature of any given nonprofit’s service-delivery model, however, may affect the proportionality of program-to-administrative expenses. By contrast, extremely low administrative expenses do not always indicate organizational health. For example, if financial statements reveal that an executive director is a volunteer (is not compensated), what mechanisms other than compensation or employment contracts are in place to ensure his or her accountability or long-term commitment to the organization? There are several resources available to help donors assess the proportionality of an organization’s expenses, assets and liabilities and determine the financial health of a nonprofit. For examples, see David Renz, ed., *The Jossey-Bass Handbook of Nonprofit Leadership and Management* (San Francisco: John Wiley & Sons, Inc., 2005); Peter Drucker, *Managing the Nonprofit Organization* (New York: HarperCollins Publishers, 1990); and other books by Peter Drucker, who is largely considered the nonprofit sector’s most influential thinker.
12. The Alliance for Justice is “the leading expert on the legal framework for nonprofit advocacy efforts, providing definitive information, resources, and technical assistance that encourages organizations and their funding partners to fully exercise their right to be active participants in the democratic process” (see <http://www.afj.org/about-afj/>). It offers sound legal advice regarding lobbying and advocacy for nonprofits (<http://www.afj.org/for-nonprofits-foundations/about-advocacy/lobbying.html> and http://www.afj.org/for-nonprofits-foundations/resources-and-publications/digital_age_public_policy.pdf) and for funders (<http://www.afj.org/for-nonprofits-foundations/about-advocacy/funding-advocacy.html>).
13. The U.S. Department of Health and Human Services Office of Minority Health defines cultural competence as “a set of congruent behaviors, attitudes, and policies that come together in a system, agency, or among professionals that enables effective work in cross-cultural situations. ‘Culture’ refers to integrated patterns of human behavior that include the language, thoughts, communications, actions, customs, beliefs, values, and institutions of . . . groups. ‘Competence’ implies having the capacity to function effectively as an individual and an organization within the context of the cultural beliefs, behaviors, and needs presented by consumers and their communities.” See Department of Health and Human Services, “What is Cultural Competency?” <http://minorityhealth.hhs.gov/templates/browse.aspx?lvl=2&lvlID=11>. This definition was adapted from Terry Cross, Barbara Bazron, Karl Dennis, and Mareasa Isaacs, *Towards a Culturally Competent System of Care, Vol. 1* (Washington: Georgetown University Child Development Center, 1989).

About the Center for a New American Security

The mission of the Center for a New American Security (CNAS) is to develop strong, pragmatic and principled national security and defense policies. Building on the expertise and experience of its staff and advisors, CNAS engages policymakers, experts and the public with innovative, fact-based research, ideas and analysis to shape and elevate the national security debate. A key part of our mission is to inform and prepare the national security leaders of today and tomorrow.

CNAS is located in Washington, and was established in February 2007 by co-founders Kurt M. Campbell and Michèle A. Flournoy. CNAS is a 501(c)3 tax-exempt nonprofit organization. Its research is independent and non-partisan. CNAS does not take institutional positions on policy issues. Accordingly, all views, positions, and conclusions expressed in this publication should be understood to be solely those of the author.

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Center for a New American Security

1301 Pennsylvania Avenue, NW
Suite 403
Washington, DC 20004

TEL 202.457.9400
FAX 202.457.9401
EMAIL info@cnas.org
www.cnas.org

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1301 Pennsylvania Avenue, NW
Suite 403
Washington, DC 20004

TEL 202.457.9400
FAX 202.457.9401
EMAIL info@cnas.org

www.cnas.org

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