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October 3, 2023

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Dear Counsel:

Re: Google Location History Litigation Cy Pres Proposal

The Rose Foundation for Communities and the Environment respectfully submits the following Cy *Pres* Recipient Proposal in accordance with the Plaintiffs' Motion for Preliminary Approval on September 14, 2023.

Sincerely,

Jodene Isaacs

Mitigation Funds Director

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The Rose Foundation for Communities and the Environment

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Google Location History Litigation Cy Pres Proposal

Organization Information

1. Name of organization

Rose Foundation for Communities and the Environment (hereinafter 'Rose Foundation')

2. Discuss the founding and history of the organization.

Founded in 1992, Rose Foundation, a 501(c)3 Grantmaking Public Charity based in Oakland, California, supports grassroots initiatives that inspire community action to protect consumers, the environment and public health. Rose Foundation is built on the belief that people need to be involved in the decisions that affect their health, lives, families, and environment. We work towards a future where nature is protected, people's rights are ensured, and social and environmental justice is advanced. Building community capacity to enable robust participate in our nation's social and environmental decision making has been at the root of everything we have done since our launch 30 years ago. Our issues have ranged across a broad spectrum of consumer protection, conservation, health and social justice, and economic equity, and specific projects have included consumer rights education and advocacy, policy development around environmental sustainability and climate resilience, and grassroots advocacy for social and environmental justice. All of our programs embrace our overarching mission of fostering stewardship, building community, and demanding justice, and we achieve these goals by supporting initiatives that help communities more effectively participate in decision-making – especially at the local and regional level in communities throughout the United States.

Rose Foundation specializes in directing consumer class action *cy pres* and environmental remediation payments back to affected communities. Guided by the settlement instructions and our community funding boards, our extensive grantmaking programs direct money to organizations focused on protecting consumer rights and the environment. Our grantmaking emphasizes community equity and social justice, and we strive to deliver the greatest benefits and impacts towards vulnerable populations who need the most help. We manage more than 20 grantmaking funds powered by *cy pres* awards or environmental settlements, and we have distributed over \$60 million to date from over 700 legal settlements. In addition, Rose has administered another \$30 million in donor advised funds as well as regranting programs with partner foundations.

3. Describe the organization's current goals.

The overall mission of the Rose Foundation recognizes that better decisions are made when the communities most affected by social and environmental injustices are at the center of the decision-making process. The Rose Foundation seeks to significantly increase investment in the protection of consumer rights, especially vulnerable underserved communities - by supporting a range of community-based projects and organizations that are building long-term solutions that benefit people, their rights, the environment, and the economy.

Most of the larger domestic foundations only focus their support on nationwide organizations. The Rose Foundation takes a different approach – we provide grant opportunities to small and mid-size organizations which represent underserved communities and unheard voices and provide them with support to engage in emerging issues, including AI, data security and internet privacy issues. While the Parties and the court are aware of all the leading national consumer privacy nonprofit organizations,

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extending the *cy pres*' full benefits across the entire range of a huge national class means going much deeper than simply supporting well-known organizations. We aim to ensure that notice of the availability of these *cy pres* funds is widely circulated into various affected communities to broadly benefit the entire class.

Rose Foundation's goal for this *cy pres* opportunity would be to reach out to hundreds of privacy organizations throughout the country and to solicit proposals squarely aimed at the on-line privacy and data security nexus in this matter. We also strive to ease post-settlement burdens by efficiently directing funds to support the interests of settling parties into communities affected by the alleged claims or violations while providing accountability by rigorously tracking grantee activities and accomplishments, and then reporting back to the parties and the court documenting how the grants tied into nexus and benefited the class.

4. Provide a brief description of the organization's current programs.

Rose Foundation for Communities and the Environment is a community-led, community-focused public foundation that provides regional and national grantmaking in the environmental and consumer advocacy sector. We have an extensive track record as a 3rd party administrator trusted by federal courts, California state regulators, and numerous plaintiff organizations and colleague foundations. Rose Foundation has been appointed as trustee in over 700 mitigation and *cy pres* funds related to consumer and environmental issues. By entrusting Rose with the duties of administrator, the class would benefit from everything we have learned in 30 years of grantmaking fueled by settlement funds.

Rose Foundation is unique relative to many other foundations in that we actively develop grantmaking programs which take the direction of the Parties in determining how to best meet the interests of the class. Further, a core part of our grantmaking mission is to ensure equity and justice are at the forefront of the process, and thus, all members of the class – especially the most vulnerable members – stand a better chance of having their privacy needs and interests represented in our grantmaking process. We also routinely conduct our grantmaking with the assistance of external expert funding boards to guide funding decisions. They allow us to identify nonprofits and university organizations whose work is at the cutting edge of a class action nexus, but which may not be immediately known to the court or the parties at the time of settlement.

5. Has your organization ever received a prior *cy pres* award? If yes, please cite the applicable. case(s), identify the amount(s) awarded, and describe the nature and scope of the project(s) Funded.

Rose currently has three consumer funds that have been developed in response to consumer advocacy related *cy pres*. They include:

• The Rose Foundation's **Consumer Privacy Rights Fund** was launched in 2002 and has received awards from 15 privacy class action settlements to date – including Bank of America, Union Bank, American Express, Cal Fed, MBNA, Fleet Bank, Chase/Manhattan, Washington Mutual, TD Bank, NDC Health, Netflix, Google, Facebook, Experian, and Total Merchant Services. To-date, the Fund has awarded over \$7.3 million in privacy grants to more than 100 consumer privacy non-profits through the United States with an additional \$1+ million scheduled to be awarded this fall. According to the Electronic Privacy Information Center, this has made the Rose Foundation one of the nation's leading supporters of consumer privacy rights and earned EPIC's *Champion of Freedom* award. All grant cycles are open-application and highly competitive, and the grantmaking



is advised by a funding board of consumer privacy education experts. For a list of past grantees, please visit: https://rosefdn.org/consumer-privacy-rights-fund/grantees

- Consumer Financial Education Fund was launched in 2012 with a \$4 million cy pres from Bank of America and has also received \$1+ million awards from HSBC and TD Bank, and a cy pres from a matter involving Chase Bank is pending. To date, the fund has awarded 90 grants totaling over \$5 million to organizations throughout the United States teach basic financial literacy to some of the United States' most underbanked and vulnerable citizens. For reports on the impacts of this cy pres fund, please visit: https://rosefdn.org/wp-content/uploads/2019/06/A-Cy-Pres-Impact-Report-2018.pdf
- Consumer Products Fund was originally launched in 2000 as the Environmental Health and Toxics Fund and rebranded as the Consumer Products Fund in 2014. It has received 18 cy pres awards including a \$6.2 million award from Apple, as well as significant cy pres awards from Neutrogena, Nvidia, Badger Meter, and Johnson & Johnson. To date, it has awarded \$5.7 million in support of organizations specializing in educating consumers about truth in advertising and technological performance of mobile devices, as well as the health impacts of product ingredients. A grant cycle is pending which will award an additional \$2.2 million. For a list of past grantees focused on technological performance and truth in advertising issues, please visit: https://rosefdn.org/consumer-products-fund/grantees

6. Has your organization been reviewed or rated by Charity Navigator or similar entity? If yes, what are the organization's ratings?

Rose Foundation for Communities and the Environment has received a 4-Star Rating from Charity Navigator and is listed as a Platinum Level Nonprofit by Guidestar recognizing transparency and efficiency. Both ratings are the highest possible and are only attained by less than 5% of all charities, and we have held them for the past 10 years running.

Grant Proposal

7. Identify the organization's principal investigator or project director.

Our Mitigation Funds Director, Jodene Isaacs, is a public interest attorney who has represented non-profits in numerous federal enforcement cases related to water and toxic waste pollution. She has extensive experience analyzing and managing technical information used to support complex litigation as well as drafting and negotiating settlement agreements. Ms. Isaacs oversees all our grantmaking funds that are derived from legal settlements and ensures that the restrictions set by the Court and Parties are met.

Concerning fiscal management of the Fund, Rose Foundation's Director of Finance, Pamela Arauz, has an MBA and background in business accounting for large international corporations and over 10 years' experience working in nonprofit financial management. She is skilled in handling court orders and mitigation funds and developed an accounting system able to manage and track large amounts of restricted funding. Rose Foundation's Finance Department also helps organize and prepare agreements, reports, and financial documents for Rose Foundation's annual audit.



The Consumer Privacy Rights Fund is also advised by Executive Director Tim Little, who developed the Foundation's grantmaking programs fueled by mitigation and *cy pres* awards, and who draws on his 40+ years of philanthropic, policy development, grassroots advocacy, and non-profit organizational development experience to guide all the Rose Foundation's programs.

8. Provide a summary of the plan for the program or project request. Include the issue and/or opportunity addressed, goals and objectives, activities, and timeline.

A. Goals and Objectives

All monies entrusted to the Rose Foundation will be dedicated solely to fulfilling the nexus of the enabling the settlement of *In Google Location History Litigation, No.5:18-cv-05062-EJD (N.D. Cal.*) and the funds will be disbursed to fund projects that are reasonably designed to mitigate, address, or support matters revolving around on-line privacy and data security issues.

B. Activities

Restricted Fund/Preservation of the Nexus: Any cy pres funds awarded to the Rose Foundation will be held in a restricted internal account dedicated only to fulfilling the purposes of the Google Location History settlement and *cy pres* order. We regard the court approval and related settlement documents as the equivalent of a Deed of Gift. As directed by the settlement and underlying body of charitable law, the Rose Foundation assumes full liability for meeting the proscribed nexus with all grants enabled by the fund.

Fund Announcement: Our consumer protection funds are all managed through a competitive openapplication process which promotes a fair distribution of both large and small groups representing varying interests across the privacy field will have the opportunity to apply, thereby benefiting the entire class and extending the funding opportunity far beyond organizations which may already be known to the Parties and the Court. The open-application process is also a crucial component of how we select the most impactful proposals for funding and thus the opportunity to select the most effective strategies and projects. We also often see applicants who are working on different aspects of the same strategy, or who otherwise might achieve greater impact by collaborating with each other, and in these instances, we may be able to broker cooperative relationships which amplify the project's benefits to the class. While we approach administering the Google Location History *cy pres* educated by our two decades of experience as a leading grantmaking in the privacy field, we know that community-based applicants working at the cutting edge of privacy protection will have fresh ideas in this fast-moving field. The open-application process provides those groups with a robust channel to teach us about the latest developments and provides a dimension which simply cannot be achieved in a more limited invitation-only process.

A Request for Proposals (RFP) would be developed and circulated to our national distribution list of privacy and consumer education non-profit organizations and educational institutions. The RFP will detail the source of funding and set forth specific application guidelines related to on-line privacy as well as data tracking and security issues. With a maximum grant amount in the \$200,000 range, we would expect to distribute around \$3 million dollars per grant round. This would entail a range of grant sizes, from approximately \$50,000 to \$200,000, which are tailored to the organization's capacity and project needs.

We broadcast our Consumer Privacy Rights Fund RFPs to a distribution list that includes close to 400 organizations that do privacy-specific work nationwide. We would also target the 400+ organizations on



our Consumer Products List since many of them have focused on privacy related concerns in the context of consumer electronics – a key audience given this matter's implications around mobile devices. In addition, we have an even larger distribution list of about 700 organizations that do consumer advocacy and education related to financial empowerment. We would also share the RFP with those groups because they have conducted privacy related education related to mobile banking and other customer security issues. While there is some cross-over between these different lists, Rose Foundation will directly reach more than 800 separate consumer education organizations through this process, and over half of them address issues that are squarely at the nexus of the Google Location History matter. The RFP notice would also be made broadly available on our website (www.rosefdn.org), and via social media channels and the appropriate foundation directories as well. Our goal will be to broadcast this opportunity as widely as possible, and we would welcome additional mechanisms suggested by the Parties. We understand that broadly broadcasting notice of the grant opportunities is important given the nationwide aspect of the class, and we would also expect to take direction from the Court and Parties on any particularly vulnerable communities within the class harmed by privacy violations which the funding should target.

To ensure we receive proposals from well-qualified applicants with strategic ideas, Rose Foundation will conduct targeted outreach to past grantees who have been high performers with projects related to internet privacy and data security. In addition to engaging with well-known, high-capacity organizations, we will specifically target some of our outreach towards smaller organizations which serve vulnerable and impacted communities. We advise community-based applicants who may need guidance in designing a competitive proposal targeting the nexus, and where appropriate, we help locally based organizations collaborate with more prominent privacy experts, thereby helping to extend the reach of the *cy pres* into communities which otherwise may not be served by more established privacy groups. By actively engaging with applicants, Rose Foundation can help worthy organizations "find the bullseye" and submit strategic proposals. We also discourage applications from groups that do not seem well poised to submit qualifying applications.

Grant Awards Process: All applications for the Consumer Privacy Rights Fund would require: 1) detailed project descriptions that explain proposed use of funds, 2) full organizational profiles that help us evaluate the applicants' capacity to successfully complete the project, including descriptions of key staff and board of directors, 3) explanation of communities served and key collaborators, 4) detailed financial information from the applicants and a specific project budget, and 5) a project timeline, identification of key deliverables, and evaluation metrics. We then provide the opportunity for funding board members to give feedback on proposals and obtain clarifications from organizations as needed. In addition to the funding board members' deep issue-based expertise, Rose staff conducts full diligence on applicant organizations' financial capacity, staff capability and track record in the field. We examine their past work product, check their references, examine the depth of their community outreach plans, and interview applicants who reach the finalist stage to make sure we fully understand their entire project. Once all the applications have been fully vetted and a slate of grantees has been chosen for each round of grants, we would then submit it to the Court for final approval.

Expert Funding Board: All our Consumer Funds are advised by expert funding boards whose members provide strategic guidance, review grant applications, and make funding recommendations. The funding boards are a cornerstone of our vetting process to help us select the most strategic and robust projects, and we would constitute a specific funding board to help oversee this *cy pres*. Members of the funding board may not be closely affiliated with any grant applicants and will be governed by the Foundation's conflict of interest policy.



Rose Foundation is presently overseeing a *cy pres* resulting from the In Re Google LLC Street View Electronic Communications Litigation class action settlement (Case No. 10-md-02184-CRB), and our Consumer Privacy Rights funding board members currently include:

- Alan Bulter, Executive Director, Electronic Privacy Information Center
- Jeff Chester, Executive Director, Center for Digital Democracy
- Nicole Ozer, Technology and Civil Liberties Director, ACLU of Northern California
- Emily Tucker, Executive Director at the Center on Privacy & Technology at Georgetown Law

Given the technical expertise required to assess cutting edge privacy advocacy and the potential for multiple grant cycles, we anticipate adding or replacing funding board members depending on the number of rounds of grantmaking we are selected to oversee. We will aim to include board members who understand both how software and apps collect private data across platforms, the contexts where opportunities for breaches lie, as well as the relevant legal requirements to effectively select projects that have the most impact. However, we are comfortable with working out a selection process that would involve recommendations from counsel in this matter, including the participation of counsel in addition to the privacy experts.

Accountability and Transparency: Once the grants are fully approved, we execute binding contracts with each organization that allow ongoing oversight of grantee progress. The default period for grant contracts is one-year, but the applicants can structure their awards over a shorter or longer timeframe based on their activities and project deliverables. Larger grants, such as those over \$200,000, may be for 2- or 3-year terms for which we require interim reports that allow grantees to document progress on their milestones and deliverables as well as provide an accounting of funds spent. We pay these multi-year grants in instalments, which allows us to maintain administrative control over the projects since we only pay the next instalment of the grant after approving the interim report. Then, after their projects are fully complete, grantees are required to submit final overall reports documenting activities, accomplishments, and expenses. These reports also ask grantees to share key insights gained during their project, and in addition to documenting direct impact, they form an important part of our knowledge base in educating future grantmaking decisions.

Although we may learn confidential strategic information from applicants and grantees during the application process – and fully honor such confidentiality, once grants have been awarded, we publicly announce the issuance of grants after every fund cycle and publish a comprehensive database of grants of all our funds on our website. We may also highlight significant accomplishments of various grants funds or specific grantees in our newsletter and communications. Unlike many other foundations, we also engage in frank conversations with denied applicants. In some instances, this can lead to a much improved and fundable future proposal. But even if there is no future pathway to funding because the fit with the fund's bullseye simply is not there, we find that most applicants appreciate the honest feedback.

Administrative Fee: The Rose Foundation charges a program administration fee to recover our costs of exercising stewardship over the funds, creating and servicing the funding board, publicizing the availability of the funds, conducting competitive grant cycles, administering grant awards, evaluating grantee progress, as well as providing reports to the parties and Court, conducting our annual audit, filing IRS and state charitable tax returns, and other related program administration and general foundation overhead. This fee is comprehensive – there are no other surcharges or annual fees. Our fee is typically scaled based



on the size of the award as well as complexity of the restrictions and reporting, and the proposed fee schedule is set forth under Question 10 and ranges from 5% to 7%.

C. Timeline

From the time of receipt of the *cy pres* award through grantee selection and the award of grant contracts, a *cy pres* grant cycle generally takes 9 – 12 months to complete. The Rose Foundation's preference is to expend larger *cy pres* awards (generally those exceeding \$3 million) in multiple grant cycles. This allows us to learn from the first round and reward the highest performers with targeted renewal grants which help them build on their first wave of success. Analyzing results from the initial round of grants also enables us to fine-tune our strategy and maximize impact in the seceding grant round(s). Depending on the grant periods, which are most typically one to two years, our oversight function over the grants awarded usually then extends for the duration of the grantee's project.

Our timeline for this *cy pres* depends on the overall amount awarded. For a *cy pres* of \$6\$ million dollars, we expect two grant cycles would be administered over a period of approximately two- and one-half years. If the *cy pres* award were closer to the \$3\$ million dollar range, we would expect to distribute that in about a year. Scaling upwards, an award in the \$10\$ million dollar range would be best distributed over three cycles administered over a period of approximately four years.

9. Explain why the organization is approaching the issue and/or opportunity in this way.

Given the size of the Google Location History *cy pres*, combined with the breathtaking evolutionary pace of technological developments such as AI which have significant privacy implications, the interests of the class will be best served by the selection of a 3rd party administrator that can distribute the award to many different groups working on disparate issue areas related to internet privacy. The Rose Foundation is best positioned to serve that role for several reasons.

First, while the Parties and the court are certainly aware of all the leading national consumer privacy nonprofit organizations, extending the *cy pres'* full benefits across the entire range of a huge national class means going much deeper than simply supporting well-known organizations. We believe the class would be well served by an administrator capable of identifying and contacting hundreds of privacy organizations throughout the country and asking them to tailor proposals squarely aimed at the on-line privacy and data security nexus in this matter.

Second, depending on the size of the *cy pres* award to the Rose Foundation, the total award may simply too much money to be awarded to privacy activists in a single stroke – especially since we achieve maximum class benefit by extending the funding opportunity to include smaller organizations working on a local or regional scale. Managing a series of national funding opportunities over the next few years that reaches privacy organizations large and small, conducting the needed diligence to ensure that applicants who are offering promising ideas have the needed capacity to complete their projects, and then actively administering the grants including follow-up reporting to assess and document results are all critical steps to an effective use of the funds. We have years of experience conducting specialized grantmaking of this nature.

Finally, none of us can accurately predict what the fast-developing technologies which impact consumer privacy will look like in the future. Thus, you need an administrator capable of assembling and facilitating a



team of privacy experts who can not only help guide strategic awards with this *cy pres* today, but can guide grants awards at the cutting edge of the privacy field throughout the entire life of the *cy pres*.

As discussed above, we have a 30-year track record as a 3rd party administrator trusted by federal courts, California state regulators, and numerous plaintiff organizations and colleague foundations that will ensure the settlement fund will be impactful in terms of privacy rights and consumer issues. California Lawyer magazine has hailed the Rose Foundation for, "its reputation for transparency and a no-nonsense approach to the competition for funds." (September 2011). We have been honored with the Electronic Privacy Information Center's prestigious Champion of Freedom award in recognition of our leadership in supporting consumer privacy rights, and have sponsored major conferences on consumer privacy issues, including the Future of Privacy Rights conference — a two-day convening of national privacy activists and scholars, as well as the California Consumer Privacy Symposium. Thus, our experience with grantmaking and specifically with privacy related funding results in a structured program that meets the needs of the underlying class.

10. Identify and explain the range of funds required to effectuate the program or project request, on an aggregate and annual basis (if applicable), including how the money will be used.

We envision awarding the funds in a series of national grantmaking opportunities. We believe that an award of \$6 million dollars would serve the class most efficiently as we could offer two grant cycles over a period of about two and a half years. Multiple cycles allow the most impactful grantees from the initial rounds to return with larger, multi-year proposals which provide us with the opportunity to invest in them with anchor funding that unlocks their full strategic potential.

That said, we can scale up or down from that amount as deemed appropriate by the Court. We could alternatively run a single grant cycle with a \$3 million dollar award or ramp up to a total of three funding cycles over four years with a \$10 million dollar award. As there are economies of scale operating multiple rounds, the administrative fees associated with each option are as follows:

Fee Schedule (based on the size of the cy pres award):

Awards up to \$3 million: 7% Awards up to \$6 million: 6% Awards up to \$10 million: 5%

Again, Rose is amenable to working out a shorter or longer disbursement schedule that meets the goals of the Parties.

11. Will the money be used to continue an existing project or create a new project?

The *cy pres* will be distributed through our existing **Consumer Privacy Rights Fund** as outlined above in Question 7.

12. What target population will your organization's project benefit?

Since the nexus of the Google Location History matter revolves around on-line privacy and data security issues, we will target application outreach and grant awards towards organizations and projects which emphasize solutions in those areas, including projects related to protection of internet privacy on both desktop and mobile devices. Guided by our national database of containing hundreds of consumer



education and consumer rights advocacy organizations that we have developed, Rose Foundation will work with experts whom we recruit to advise our consumer funds and identify nonprofits and university organizations whose work is on point with the class action nexus, but which may not be immediately known to the court or the parties at the time of settlement.

Diversity, equity, justice, and inclusion are core organizational values that are expressed in all our grantmaking. We have worked hard over the years to build outreach lists and maintain a mosaic of grantees that reflects our values, and we practice active engagement with applicants to help community-based applicants shape competitive funding proposals. We therefore give preference to applicants that are doing work that specifically benefits underserved and BIPOC communities which are part of the overall class.

As discussed above, our goal will be to broadcast this opportunity as widely as possible, and we would welcome additional mechanisms suggested by the Parties. We understand that broadly broadcasting notice of the grant opportunities is important given the nationwide aspect of the class, and we would also expect to take direction from the Court and Parties on any particularly vulnerable communities within the class harmed by privacy violations which the funding should target.

Evaluation

13. Will your organization agree to provide a report to the Court and the parties every six months informing the Court and the parties of how any portion of the Settlement Fund allocated to it has been used and how will the remaining funds be used?

Rose Foundation is very experienced in providing reporting to the Court and litigants on the distribution of funds including project descriptions and grant terms. We do this on nearly every one of our settlements involving federal environmental statues as well as for larger *cy pres* where we routinely report back to the Court and parties as dictated by their terms. Rose Foundation agrees to report back to the Court and the parties every six months informing the Court and the parties on the following the number, size, and short summary of grants awarded, and the timeline for distributing remaining funds.

14. Describe how your organization will evaluate the success of the grant on enhancing or promoting the protection of internet privacy.

The interim or final reports provided by the grantees will form an important part of documenting impact. This is a standard part of our accountability mechanism, and these reports provide the parties and the court assurance that the grants awarded conform with the settlement requirements for all mitigation and *cy pres* payments entrusted to the Rose Foundation. We also publish a description of all grants we have made on our website on an ongoing basis. However, our reporting process goes beyond merely documenting performance. We also ask grantees to share key insights gained during the project, and we regularly share this knowledge broadly to build the entire field, as well as to fuel Rose's knowledge base, evaluate our impact, and help us make educated grant decisions in future rounds. Since the Rose Foundation will track our grantees throughout the life of their projects, we provide a robust accountability mechanism that is often lacking in many other settlement award processes. This benefits the underlying parties because it ensures that the money is spent to the best effect.

15. Does your organization intend to use the results of the project in any publications, conference papers, and presentations?



After the grant cycle supported by this *cy pres* has been completed and the grants are awarded, the Rose Foundation shall publish on its website a list of grantees along with descriptions of projects funded, and Rose Foundation shall supply reports to the parties describing the grants awarded and their conformity with the *cy pres* nexus. Periodically, the Rose Foundation also publishes more general reports that highlight significant accomplishments, best practices, and/or lessons learned of various grants funds or specific grantees on our website (https://rosefdn.org/reports) which we may share with other grantees. However, we do not expect to use the results of the project in any outside publications, conference papers, or external presentations.