

Coordination with Good Days Foundation, Inc. Policy (7.6)

Good Days Adolescent Special Needs Center, LLC – Fort Myers, FL

This policy establishes the framework for coordination and collaboration between Good Days Adolescent Special Needs Center, LLC (hereinafter referred to as “the Center”) and Good Days Foundation, Inc. (hereinafter referred to as “the Foundation”). The purpose of this policy is to ensure compliance with all applicable federal and state regulations governing charitable contributions, financial integrity, and operational independence between the two entities while supporting their shared mission to improve the lives of adolescents with special needs.

Purpose

The purpose of this policy is to define the roles, responsibilities, and procedures governing the coordination between the Center and the Foundation. This includes the management of scholarships, donations, and in-kind support provided to eligible students of the Center through the Foundation.

Scope

This policy applies to all Center administrative staff, directors, and representatives who engage in activities involving the Foundation, including but not limited to scholarship coordination, communication, promotional materials, and recordkeeping.

Organizational Independence

The Center and the Foundation are legally distinct entities. The Center operates as a limited liability company (LLC), while the Foundation operates as a registered 501(c)(3) nonprofit corporation. To maintain compliance with IRS and state regulations, each organization must maintain separate financial records, governing bodies, and operational decision-making processes.

- The Center may not commingle funds with the Foundation.
- The Foundation shall make independent decisions regarding disbursement of scholarship funds.
- Shared resources, if any (e.g., office space, equipment, or marketing materials), must be documented under a written Memorandum of Understanding (MOU) or lease agreement.

Coordination of Scholarships and Funding

The Foundation may provide financial assistance to eligible families enrolled at the Center through tuition scholarships or grants. The Center shall provide the Foundation with verified enrollment information necessary to confirm eligibility but shall not influence award decisions.

Procedures include:

- The Foundation shall establish its own scholarship application and review process.
- The Center may assist families in completing scholarship applications but may not

determine outcomes.

- All payments from the Foundation for scholarships shall be made directly to the Center on behalf of the student, not to individuals.

Communication and Branding

The Center and the Foundation may jointly promote programs and events that advance their shared mission, provided that clear distinctions between the entities are maintained. Any co-branded materials must include appropriate disclaimers clarifying that the Foundation is an independent charitable organization supporting the Center's mission.

All public communications referencing both organizations must:

- Be approved by the Center's Director and the Foundation's Board or authorized representative.
- Use approved logos and branding guidelines for each entity.
- Avoid implying that charitable donations are made directly to the Center.

Data Sharing and Confidentiality

The Center may share limited, non-confidential student information with the Foundation solely for scholarship or reporting purposes, consistent with applicable privacy laws. All shared information must comply with HIPAA and FERPA confidentiality standards.

- No medical or diagnostic information shall be shared without written consent from the parent or guardian.
- Data exchanges must be securely transmitted and logged for audit purposes.

Financial Transparency

The Center and the Foundation shall maintain transparent accounting practices to ensure compliance with IRS, Florida Department of Agriculture and Consumer Services (FDACS), and other applicable regulatory bodies. Annual reconciliations or financial audits must demonstrate that no funds are improperly transferred or misallocated between entities.

Review and Oversight

This policy shall be reviewed annually by both organizations' leadership to ensure continued compliance and effectiveness. Any revisions shall be documented and approved by the Center's Director and the Foundation's Board of Directors.

Enforcement

Violations of this policy may result in disciplinary action, termination of employment or volunteer status, or legal penalties if found to be in violation of federal or state nonprofit regulations.

Approved: December 2025

Next Review: December 2026