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VIA FEDERAL EXPRESS

Internal Revenue Service  
Exempt Organizations  
550 Main Street  
Cincinnati, OH 45202-5204  
ATTN: Grant Herring  
Room 4511  
Group 7827

TE/GE Processing  
Correspondence  
RECEIVED  
SEP 12 2016  
Internal Revenue Service  
Cincinnati, Ohio

Dear Mr. Herring:

Thank you for your reply to Daniel R. Mellema seeking clarification on several points related to Focus on the Family's request to the Internal Revenue Service for reclassification of foundation status. As General Counsel and corporate secretary for Focus on the Family and as one of its authorized representatives, I consider it a privilege to respond. The purpose of this letter is to answer the questions that you posed under point 1 in your letter, as well as to address the specifics requested under the bullet points and items "a" through "f" under point 2. Focus on the Family welcomes this opportunity to provide additional information. For the purpose of clarity, the questions you posed in your letter are highlighted in bold below, followed by Focus on the Family's answers to each point.

**1. While churches often conduct activities that further exempt purposes other than purely religious purposes (e.g., promoting education, relieving the poor and distressed), the Service may question whether an organization (viewed as a whole) is a church if it carries on excessive activities viewed as secular when carried on by secular organizations (e.g., operating hospitals, nursing homes, or schools with a general curriculum) or conducts excessive broadcasting or publishing in relation to its other activities.**

**An organization qualifies as a church only if its principal purpose or function is that of a church. See Rev. Rul. 56-262. 1956-1 C.B. 131.**

The principal purpose or function of Focus on the Family is as a church. In Mark 16:15, Jesus Christ instructed His followers, "Go into all the world and preach the gospel to all creation." This

is the *Great Commission*, viewed by Focus on the Family as a religious imperative for its broadcasting on which there can never be “excessive” emphasis. Consistent with Mark 16:15, all of Focus on the Family’s activities—whether radio broadcasts, web sites, outreach programs, or numerous other forms of ministry—are directly tied to its mission of “cooperating with the Holy Spirit in sharing the Gospel of Jesus Christ with as many people as possible by nurturing and defending the God-ordained institution of the family and promoting Biblical truths worldwide.” Naturally, it is true enough that not all churches have radio ministries, and that some choose to fulfill the *Great Commission* otherwise, but to suggest that having a media ministry disqualifies Focus on the Family from church status is clearly inconsistent with modern church practice, which includes numerous examples of churches with a robust media outreach including Willow Creek Church, Lifechurch.tv, Saddleback Church, North Point Community Church, and numerous others. For earlier church history, too, the beginning of broadcasting and publishing itself reveals the church playing a principal role.

The technology for broadcasting used in the church has changed, but the mandate (as opposed to the *choice*) is the same. Matthew and Mark record that Jesus got into a boat and went out a little ways to speak to crowds on the shore.<sup>i</sup> Many biblical scholars think this is because of the amplification properties of water. The disciples broadcast the *Good News* in person on foot.<sup>ii</sup> As soon as technology allowed, beginning in the 1920s, churches launched media ministries of all kinds including radio and television broadcasts throughout the world. Public radio broadcast began on *Station KDKA* of Pittsburgh on November 2, 1920. Just a couple months later, KDKA aired the first religious service on radio of Pittsburgh’s Calvary Episcopal Church, which led to a weekly tradition thereafter.<sup>iii</sup> Soon, churches began offering broadcasts not only of services, but also Bible stories and other subjects. Focus on the Family fits squarely within this long church tradition.

Publishing has an even longer church pedigree than broadcasting. Consider that the first “published” book was the *Gutenberg Bible*. Johannes Gutenberg invented movable type for the single reason that Focus on the Family today utilizes media: to spread the *Good News*<sup>iv</sup>. Several centuries later, the Bible remains the number one selling publication. Focus on the Family’s publications rely extensively on the Bible and the Gospel message. Examples include recent issues of *Focus on the Family Magazine* featuring articles entitled “Who is the Holy Spirit?” and “Overcoming Unforgiveness,”<sup>v</sup> as well as the digital booklet “Coming Home: An Invitation to Join God’s Family”<sup>vi</sup> and the Christian worldview curriculum *The Truth Project*<sup>vii</sup>.

All of this underscores that distinguishing the “religious” from the “secular” is a tricky matter, fraught with constitutional dangers. In the several decades since Rev. Rul. 56-262 was issued, federal courts have commonly warned about the hazards of drawing the distinction. *Sklar v. Comm’r of Internal Revenue*, 282 F. 3d 610, 613 (9<sup>th</sup> Cir. 2002) (citing *Hernandez v. Comm’r*, 490 U.S. 680, 694 (1989)). Several of the examples that you provide in your question illustrate why. Most notably, you have been unable to pigeonhole education in either the secular or religious box based on curriculum. Content is equally important to distinguish secular from religious publishing and broadcasting. For example, the Bible is undeniably a religious publication, whereas *The Origin of Species* is not. Focus on the Family’s publishing and broadcasting is dependent upon the Bible and is as or more thoroughly religious than any religious school’s curriculum.

Focus on the Family emphatically believes that its activities on behalf of the poor and distressed are also religious. For example, a wide body of research reveals that the breakdown of the family is one of the strongest predictors of poverty<sup>viii</sup>. Focus on the Family's Gospel-centered approach to building stronger families is without question an important form of outreach to the poor. What is more, Focus on the Family's efforts to highlight the plight of orphans worldwide (see [iCareAboutOrphans.org](http://iCareAboutOrphans.org)) is another important component of the ministry's outreach to the poor and oppressed. The motivation for this component of the ministry's outreach is grounded in the Sermon on the Mount<sup>ix</sup>.

Examining your question further, Focus on the Family does not engage in operating hospitals or nursing homes, but certainly does defend life by ministering to women and babies in distress as a result of crisis pregnancies. This, too is a fundamentally religious commitment rooted in Genesis 1. Because men and women are created in God's image, the church has historically defended the special value of human life. Setting aside as immaterial to this application whether healthcare is or was primarily religious when Rev. Rul. 56-262 issued,<sup>x</sup> Focus on the Family qualifies as a church because its principal purpose or function, sharing the Gospel of Jesus Christ, is that of a church and because it satisfies the other criteria discussed below.

It is well established that the call to evangelize or otherwise spread one's religious beliefs is an integral part of many faiths. See *Foundation of Human Understanding*, 88 T.C. 1341 (1987). Like other churches, Focus on the Family employs a number of different strategies in carrying out this religious mission, some of which may have "secular" parallels, but none of which could ever be mistaken as secular by the reasonable observer. All of them are fundamentally religious and consistent with ancient and modern church history. We invite you to listen to the broadcasts of Focus on the Family and review its publications yourself to confirm this.

**Please estimate the percentages of your time and resources devoted to worship, prayer groups, study groups, spiritual counseling and other communal and interpersonal religious activities.**

Focus on the Family estimates that in excess of 80 percent of its time is devoted to worship, prayer, Bible study, spiritual counseling, and other communal and interpersonal religious activities. As outlined in Focus on the Family's initial request, the ministry sets time aside daily for its members to engage in prayer and devotions, and it also conducts a monthly chapel service that is open to the public and has other space reserved on its campus for prayer and reflection.

At the same time, it is clear that the definition of a *church* is not just a building where people gather to worship on Sundays. Rather, the Church as outlined in the New Testament Scriptures is defined as a place for believers to live and serve missionally. In that sense, the vast majority of every congregation member's time at Focus on the Family is devoted to carrying out Gospel ministry. While *worship* certainly includes times of corporate singing and prayer, it also includes the aforementioned acts of daily mission and service. Without question, Focus on the Family's members' daily work *is* worship.

**2. The Service considers all the facts and circumstances in determining whether an organization is a church, including whether the organization has the following characteristics:**

- **a distinct legal existence**—Focus on the Family is a California corporation which came into existence as a distinct legal religious entity on June 7, 1977. Focus on the Family filed for and was determined to be an exempt organization under Code Section 501(c)(3) on February 14, 1978. The Articles of Incorporation state “The corporation is formed for the express purpose of spreading and propagating the Gospel of Jesus Christ. Such purposes for which this corporation is formed are exclusively religious within the meaning of section 501(c)(3) of the Internal Revenue Code of 1954.”
- **a recognized creed and form of worship**—Like other churches, Focus on the Family has a recognized creed and form of worship. Focus on the Family’s Statement of Faith and Guiding Principles, all of which are explicitly derived from Scripture and are similar to statements and creeds of orthodox Christianity embraced by other churches, is reattached as **Exhibit A**. As discussed in more detail below, Focus on the Family’s form of worship is broadly consistent with other evangelical churches, but also distinctive in its emphasis on “work as worship.”
- **a definite and distinct ecclesiastical government**—Focus on the Family has both a definite and distinct ecclesiastical government structure. *Merriam-Webster* defines “definite” as “having distinct of certain limits” and “free of all ambiguity, uncertainty, or obscurity.” *Merriam-Webster* defines “distinct” as “different in a way that you can see, hear, smell, feel, etc.; noticeably different.” Below, you state that Focus on the Family’s “provisions for ecclesiastical governance are completely unlike those made by churches generally.” To this extent, you concede that Focus on the Family has a distinct process for determining who fulfills the ecclesiastical leadership of the church including the roles of deacons and elders as discussed in item 2c below. Focus on the Family’s form of governance is also unambiguous and certain and, thus, definite in that it is memorialized in Bylaws, easily understood, and carefully observed and followed.
- **a formal code of doctrine and discipline**—Focus on the Family has a formal code of doctrine and discipline. Focus on the Family’s formal code of doctrine and discipline for members is attached as **Exhibit B**.
- **a distinct religious history**—Focus on the Family has a “distinct” or, to borrow from the *Merriam-Webster* definition above, “noticeably different” religious history. Dr. James Dobson founded Focus on the Family in 1977 in response to trends in the culture and established church that alarmed him as relates to their dissonance with biblical commands and values especially as relates to marriage and parenting. Dr. Dobson became convinced that the established church was not satisfactorily addressing them. A number of popular

speakers and teachers in the 1970s were dispensing marriage and parenting advice that ran counter to Biblical principles. Focus on the Family was established as a direct response to this movement, advocating a more traditional, scripturally-based approach. There was clearly a high demand for this type of Gospel-centered message, as evidenced by the significant growth in Focus on the Family's membership in the years that followed. Focus on the Family's noticeably different commitments to subject matter such as a biblical approach to marriage and parenting remain fundamental to Focus on the Family even as it continues to refine and expand its ministry.

Focus on the Family's request for reclassification should not be viewed as out of character with its distinctive history but evidence that the ministry continues to adapt and institutionalize as have most churches before it. Within the evangelical tradition, consider John Wesley, who is credited with founding Methodism. In the early 1700s, as curate of his father's Anglican parish, he led what was initially known as the "Holy Club," founded for the purpose of study and the pursuit of a devout Christian life. Here was the start of Methodism with each member taking communion elsewhere, fasting two days per week, and participating in Bible study.<sup>xi</sup> Impelled by the same mandate as Focus on the Family, Wesley traveled by horse and began to found societies utilizing men not ordained by the Anglican Church. Eventually, the Methodist Church took on a closer resemblance to established churches, subject to important distinctives then known as "circuit riding." Regardless, there never was a time when it was not a church. So it is that as Focus on the Family continues to institutionalize, this church also is beginning to resemble others, subject to Focus on the Family's own distinctive approach and message.

- **a membership not associated with any other church or denomination**—Focus on the Family's membership is associated with other churches. Focus on the Family embraces the New Testament definition of the Church at large as the worldwide body of Christian believers, not confined to one location, building, or denomination. The teaching of Scripture is that the universal Church—the global body of those who follow Christ—fulfills two primary roles: 1) service and mission and 2) teaching and equipping believers. Some churches, such as Focus on the Family and the Salvation Army, are focused on the first role (service and mission), while many local congregations are focused on the second (teaching and equipping the faithful). Other churches such as Young Life, the Navigators and Wycliffe Bible Translators function as sending organizations whose members are also members of local congregations. To illustrate, similar to a pair of scissors, the service and mission "blade" and the teaching and equipping "blade" combine to form a single entity known as the Church. Like other churches, Focus on the Family welcomes collaboration between different congregations in order to accomplish the greater good of spreading the *Good News*.

- **a complete organization of ordained ministers ministering to their congregations—**  
Focus on the Family has a complete organization of ordained ministers ministering to its congregation. Focus on the Family interprets the word “ordain” according to its literal understanding in Scripture. The word “ordain” in the Bible refers to a setting in place or designation; for example, Joseph was *ordained* as a ruler in Egypt (Acts 7:10); the steward in Jesus’ parable was *ordained* to oversee a household (Matthew 24:45); and deacons were *ordained* to serve the Jerusalem church (Acts 6:1-6). With respect to ordination, the Bible does not have a specific or defined process or liturgy for ordination; consequently, the ordination process varies radically by church with some contingent upon years of study and preparation and others available for little more than a fee.

Biblically, “ordinations” are appointments. Scripture talks about choosing those with wisdom and leadership abilities from among the body of believers. In Acts 13, God Himself calls the ordained and qualifies them with gifts (Acts 20:28; Ep. 4:11); the ordained recognize God’s clear leading and embrace it, after which the church commissions them (cf. Acts 6:6; 1 Tim. 5:22). This is precisely the type of ordination that all leadership and staff of Focus on the Family profess. The concept of ordination is made explicit in membership, which requires every member to sign the Focus on the Family Statement of Faith and to demonstrate the “Character/Spiritual” attributes found on every job description:

- *Exemplifies Ephesians 5:1-2, “Therefore be imitators of God as dear children and walk in love, as Christ also has loved us and given Himself for us...”*
- *Pursues the Great Commission given by Jesus Christ in Matthew 28:19-20, “Go therefore and make disciples of all the nations, baptizing them in the name of the Father and of the Son and of the Holy Spirit, teaching them to observe all things that I have commanded you; and lo, I am with you always, even to the end of the age.”*
- *Is a consistent witness for Jesus Christ; maintains a courteous, Christ-like attitude in dealing with people within and outside of Focus; adheres to the Standard of Moral Conduct and Statement of Faith; upholds Focus on the Family’s ministry in prayer*
- *Prays personally for Focus on the Family’s staff and constituents and may occasionally lead in a public prayer*
- *Demonstrates behaviors aligned with FOF core values*

The term “minister” is used in the Bible as you have used it—as a noun and verb, with the noun contingent on the verb. Ordinarily, the term is used in connection with Christ; for example, Paul described Epaphras as a “faithful minister of Christ on our behalf” (Col. 1:7) and himself as a “minister of Christ Jesus to the Gentiles” (Rom. 15:16). Similarly, Paul said Christ made him competent as a minister of the new covenant (2 Cor. 3:6). Although

a trained theologian, Paul emphasized that his competence came from God, not himself (2 Cor. 3:5-6). Focus on the Family employs many who have likewise completed biblical and theological training (currently 100 members or 16.6 percent of the total congregation), but this is not what makes them “ministers” as opposed to the competence that comes from God. “Ministry” is also linked inexorably to the proclamation of the Word of God (Acts 6:2, 4). Focus on the Family exclusively hires faithful ministers of the Gospel committed to proclaiming it throughout the world. Consequently, Focus on the Family has a complete organization of ordained ministers involved in ministry to the Lord’s people (1 Cor. 14:33).

- **ordained ministers selected after completing prescribed courses of study**—Focus on the Family has a process for training and mentoring its ordained ministry leaders that is outlined in **Exhibit C**. This includes a development program for senior leadership, a mentoring experience for new congregants, and a foundational Gospel-centered training program. These are in addition to the preexisting Biblical and theological training that many of our members already possess. In addition, Focus on the Family expects that its ministers will maintain active, ongoing Biblical study.
- **a literature of its own**—Over the past 40 years, Focus on the Family has developed and published a long list of biblically-based books on marriage and parenting, along with numerous other resources and materials, including audio and video content, emphasizing the importance of a life dedicated to following Christ. A sample of Focus on the Family’s literature is attached as **Exhibit D**.
- **established places of worship**—Focus on the Family has an established place of worship. At the heart of the Focus on the Family campus is a modern 750-seat worship auditorium. It doubles during the lunch hour as a dining facility and, hence, is called the “chapelteria,” but in all respects it looks and functions like most modern evangelical churches with a platform, pulpit, extensive seating, lighting, public address system, audiovisual equipment, and musical instruments.<sup>xii</sup> Dual use worship facilities are now common, especially among evangelical churches due to the expense and difficulty of siting facilities.
- **regular religious services**— Focus on the Family has more services than many churches; services occur daily, weekly and monthly. *Merriam-Webster* defines the term “regular” as “happening over and over again at the same time or in the same way: occurring every day, week, month, etc.” Focus on the Family’s regular religious services are organized as follows:
  - On Monday, the entire membership of about 600 meets in a common area for a prayer meeting.
  - On Tuesday, small groups meet to pray for specific requests that are sent to Focus on the Family from across the world.
  - On Wednesday, a group of about 80 gathers together to listen to a guest speaker on a spiritual topic while other groups meet for prayer.

- On Thursday, about 150 gather for a time of praise and worship while smaller groups gather independently for Bible study.
- On Friday, each department gathers to pray for internal needs and to study the Bible. In addition, at least once per month the entire membership of 600, along with visitors from the general public, participate in a religious service including worship, Scripture reading, prayer, and a homily.

As at other churches, many special observances are also held annually in connection with religious holidays and commemorations such as Christmas and Easter, and special weeks of religious-themed conferences including religious instruction, prayer and worship are scheduled. Recent examples include the *Pursuit* conference for single adults, a Prayer for Prisoners event, and a Thanksgiving prayer service. All of these constitute regular religious services.

- **regular congregations**—Focus on the Family has a regular congregation. *Merriam-Webster* defines a “congregation” as “the people who are attending a religious service” and “the people who regularly attend religious services.” The English word comes from the Greek word *ecclesia*, which means the people “called out” from the world and to God. Focus on the Family has over 600 people who regularly attend religious services at Focus on the Family and, thus, constitute a regular body of believers and congregation. They believe they are called out from the world and to God. In addition, Focus on the Family, like other churches, invites visitors to its campus who are welcome to join the congregation and participate in religious services. Besides its local congregation, Focus on the Family has a regular listening audience numbering roughly 5.5 million nationwide. Historically, Focus on the Family has considered these listeners both its mission field *and* an extension of its congregation, as do other churches that employ radio and other media to spread the Gospel. In this same sense, 1 Corinthians 14:33 refers to “all the congregations of the Lord’s people.”
- **Sunday schools for the religious instruction of the young**—Focus on the Family offers several types of religious instruction for youth on-site including *Pursuit*, a conference for unmarried young adults. Focus on the Family also publishes a large variety of religious instructional materials for the young such as *Bible Kidventures: Stories of Danger and Courage*, *Clubhouse Magazine* and *Clubhouse Junior*. In addition, the Odyssey Adventure Club<sup>xiii</sup> offers kids ongoing access to a broad range of spiritually enriching audio, video and printed material associated with Focus on the Family’s biblically-based radio drama *Adventures in Odyssey*. All of these materials reinforce biblical values and are filled with faith-filled and creative storytelling, which is a prominent method of Jesus’ teachings known as parables. For example, the featured article in a recent issue of *Clubhouse Junior*, intended for children ages 3-7, is entitled “The Fabulous Fruit of the Spirit” based on Galatians 5:22-23<sup>xiv</sup>; while the featured article in *Clubhouse Magazine*, intended for kids 8-12, is entitled “Friends with God” based on James 2:23.<sup>xv</sup> The *Adventures in Odyssey* audio dramas include titles such as “The Meaning of Sacrifice,” “The Last Shall Be First,” “The Second Coming,” “Elijah,” “A Prisoner for Christ,” “Go Ye Therefore,”



“And When you Pray,” and “By Faith, Noah”.<sup>xvi</sup> Focus on the Family chooses to broadcast this instruction so as to reach the widest possible audience, rather than teach the materials itself. The concept of separate “Sunday school” programs for the young is not something specifically prescribed in Scripture as integral to a functioning church. For this reason and because Focus on the Family has chosen to reach a broader audience, Focus on the Family does not offer Sunday school directly. Nevertheless, local Sunday school programs commonly use Focus on the Family’s religious instructional material, some of which is specially designed for this purpose.

- **schools for the preparation of its ministers**—It is important to note that a significant number of evangelical churches do not have schools for ordination or ministerial preparation. Even so, because Focus on the Family believes that *all* of its members are ministers, as described above, it endeavors to equip and prepare them using a variety of means. From 1995 until 2015, the *Focus on the Family Institute* was an undergraduate level program (offered for part of this time in cooperation with Colorado Christian University), designed to equip tomorrow’s leaders for family, church and society. Students could take up to 23 credit hours in Christian Worldview Studies; Family, Church and Society Studies; Gender and Leadership; Marriage and Family Life Studies; Cultural Issues in Christian Perspective; and Family Issues in Christian Perspective. In 2015, the program was temporarily suspended for financial reasons, apart from the practicum which remains open for select students. Focus on the Family also has discipleship programs in which its senior leaders instruct those under them as the apostle Paul instructed Timothy (see 2 Timothy 2:2). This includes the PD@F program, in which senior leadership identifies and develops members with leadership potential, as well as a member mentoring program in which new members are mentored and discipled by veteran members. Ultimately, because Focus maintains that all of its members are ministers, it makes an effort to invest in the spiritual development and training of everyone in the congregation. Again, this process is modeled after the New Testament example of the Apostle Paul, who not only instructed Timothy, but also admonished him to pass on what he had learned to others.

**Your characteristics do not appear to line up very strongly with the fourteen points just mentioned.**

This statement preceded and is inconsistent with the fourteen point explanation elaborated above. As a matter of law, Focus on the Family is not required to meet all of the fourteen points to qualify as a church; and, in this case Focus on the Family satisfies all or most of them.

**Please comment upon each of the following observations. Indicate whether you consider these statements accurate, and if you do not, explain why you do not, citing any applicable legal precedents.**

- a. Your entire membership appears to be associated with other churches. You have no religious services on Sunday, when your employees attend the churches to which they and their families belong.**

As stated elsewhere, the clear teaching of Scripture is that the universal Church—the global body of those who follow Christ—fulfills two primary roles: 1) service and mission and 2) teaching and equipping believers. Some churches, such as Focus on the Family and the Salvation Army, are focused on the first role (service and mission), while many local congregations are focused on the second (teaching and equipping the faithful). Like a pair of scissors, the service and mission “blade” and the teaching and equipping “blade” combine to form a single entity known as the church.

With this in mind, Focus on the Family encourages its members to be part of a local church in order to be strengthened and equipped to carry out its congregation’s mission of serving families and proclaiming the Gospel. Throughout history, it has been quite common for believers to be involved in more than one church body or congregation concurrently. Missionaries, for example, will join a missions organization and become members of a church in a foreign country while retaining membership in a church in their home country. Participation in more than one congregation is integral to the idea of Christian fellowship and encouraged at Focus on the Family. Focus on the Family does not hold services on Sunday, but neither do many other churches such as the Seventh-day Adventist Church.

- b. You do not appear to have a “regular congregation.” The right to participate in your worship, prayer, and religious study gatherings is contingent on employment by your organization. Membership tied to employment with a particular employer is not what is normally understood as a “regular congregation.”**

Employees of and volunteers at Focus on the Family participate in regular religious services including worship, prayer and religious study at Focus on the Family. Similar to other churches, visitors also join the employees and volunteers to constitute the regular congregation that participates in services. For this reason and because volunteers join religious services, participation is not in fact contingent on employment. The idea that employees do not ordinarily comprise part of a regular congregation is inconsistent with the practice in many churches. It is not unusual for employees of churches to participate in their regular congregations as ministers, musicians, teachers, sound and lighting technicians, and business personnel. In fact, church employees are typically among the most involved in regular congregations and most integral to the church’s activities.

- c. **Your provisions for ecclesiastical governance are completely unlike those made by churches generally. The religious leadership appears to be exercised by the same persons who direct the business operations. The leaders do not appear to have been ordained, or to have studied to be ministers of the Gospel, but are simply deemed to qualify for the diaconate based on the importance of the roles they play in your business operations.**

There is not a single established model for church governance. Focus on the Family disagrees that its form of ecclesiastical governance, although distinctive, is “completely unlike those made by churches generally.” Nearly all congregational churches in the United States have a board of directors that doubles as a board of elders or board of deacons. Within the churches, these individuals are known as “Elders” or “Deacons,” but they are known to their respective secretaries of state as simply “Directors.” Consequently, there is not in fact a material difference between the way Focus on the Family is governed and the majority of congregational churches in the United States.

Focus on the Family believes in the inerrancy of the Bible, which teaches that Elders are “overseers” who “manage God’s household,” encourage others by sound doctrine and reprove doctrinal error. They must be blameless, faithful to their wives, men whose children believe and are not open to the charge of being wild or disobedient, not overbearing, not quick-tempered, not given to drunkenness, not violent, and not pursuing dishonest gain; they must be hospitable, love what is good, and self-controlled, upright, holy and disciplined (Titus 1:5-9). Like other churches, Focus on the Family has chosen its Elders on this biblical basis.

It is also typical for the officers of churches to be Deacons or Elders. According to the Bible, Deacons are another kind of “overseer,” dedicated to service within the church body. They must be above reproach, faithful to their wives, temperate, self-controlled, respectable, hospitable, able to teach, not given to drunkenness, not violent but gentle, not quarrelsome, not lovers of money, must manage their family well, may not be recent converts and must be worthy of respect (I Timothy 3). Like other churches, Focus on the Family has chosen its Deacons on this biblical basis. The President of Focus on the Family, like the President of most churches, is the head Deacon and Elder. Nothing is unusual about this arrangement, nor is it unusual whatsoever for the officers of a church to run the business of the church and to be primarily responsible for the religious instruction within the church. Quite to the contrary, this is the norm in evangelical churches. Candidly, some officers may be better at one or the other function, so they may tend to concentrate on one side or the other, provided that in the smallest churches a single officer or a couple of officers tend to be the “jack of all trades.”

As discussed above, the Deacons of Focus on the Family are ordained in the Biblical sense, but even if they were not this also would not be unusual. Churches and entire denominations across America routinely appoint non-ordained leaders. For example, the Quakers, one of the founding American denominations, have long rejected altogether ordination for ministers.<sup>xvii</sup> Instead, Quakers have always emphasized that all Christians are called to be ministers and to minister, each according to their spiritual gifts. Notwithstanding this, there is no question that Quakers are part of a church. Focus on the Family does not hire any staff who are not called to minister according to their spiritual gifts, consonant with Focus on the Family's foundational purposes.

- d. There appears to be nothing distinctive about your creed, form of worship, doctrine, discipline, history, or literature that would cause a group of believers to coalesce around you.**

Respectfully, the ecclesiastical judgment at the heart of your statement is the epitome of the type the Establishment Clause precludes government from making and, besides this, is flatly contradicted by Focus on the Family's regular listening audience numbering roughly 5.5 million nationwide. The great number of pilgrims who visit Focus on the Family annually from across the world, and the wait list that Focus on the Family has for employment also contradicts your statement. The group of believers that coalesces around the creed, form of worship, doctrine, discipline, history and literature of Focus on the Family is among the largest in the world. As discussed above, Merriam-Webster defines the term "distinctive" as "having a quality or characteristic that makes a person or thing different from others: different in a way that is easy to notice." Understood as such, it is easy to identify several distinctive elements of Focus on the Family's creed, form of worship, doctrine, discipline, history and literature.

A "creed" has been defined as a "fixed formula summarizing the essential articles of the Christian religion and enjoying the sanction of ecclesiastical authority." Focus on the Family's creedal and doctrinal statement derives from centuries of creedal development beginning with the Apostles' Creed (ca. 140), Nicene Creed (325), Councils of Ephesus (431, 449, 475), Council of Chalcedon (451), Athanasian Creed (late-400s to early-500s), Councils of Constantinople (381, 553, 681), Councils of Carthage and Orange (419 and 529), Council of Trent (1545-63), Heidelberg Catechism (1563), Thirty-nine Articles of Religion (1563), Westminster Confession of Faith (1646), Lausanne Covenant (1974), and Chicago Statement on Biblical Inerrancy (1978). Historically, Councils were called to address disagreement over theological issues and practical ramifications of Christian beliefs. Those who attended certainly viewed the results of their work as distinctive; in fact, some died for their causes.

Focus on the Family's statement of belief is distinctive to the same extent and in contrast to the theological views of non-Christians.

Focus on the Family's form of worship and discipline is likewise distinctive as compared to non-Christian groups, although it is true that it is similar to many other evangelical churches.

Finally, for the reasons discussed above, Focus on the Family's history and literature is also distinctive. Focus on the Family's gospel-centered approach to marriage and family issues sets it apart from non-Christian groups and most other churches. In fact, there are no modern parallels whatsoever to most Focus on the Family publications or broadcasts. Radio dramatization was largely abandoned by the 1970s, but Focus on the Family has brought it back in a form dedicated to religious instruction for youth through *Adventures in Odyssey*. Programs designed to build marriage and on parenting from a Christian perspective are also rare in other churches.

**e. Your congregational/associational activities appear to be incidental to your media activities.**

Focus on the Family's congregational and associational activities are fundamental to all of its endeavors. Without them, Focus on the Family could not carry on any media ministry. Focus on the Family's congregational activities are designed to equip members to engage in the day-to-day ministry of spreading the Good News through various media outlets. *Merriam-Webster* defines an "association" as "an organized group of people who have the same interest, job, etc." Focus on the Family chooses to associate exclusively with persons of like-minded faith equally committed to sharing the Gospel. As an association and congregation, Focus on the Family, like many other churches, wants to bring the Gospel of Jesus Christ to as broad an audience as possible, and, as a result, has employed a broad range of media to accomplish that mission. But the media is incidental to the ministry rather than vice-versa. Like Willow Creek Church, Lifechurch.tv, Saddleback Church, North Point Community Church, and numerous other examples, Focus on the Family employs radio, TV, the Internet, digital apps, books, and numerous other materials in order to spread the Word to a national and even international audience. This is a primary function of any church in the modern era. The notion that a "church" is a simple building where people gather to hear a sermon every Sunday is not only antiquated, but also inconsistent with the description of the church found in the New Testament. That said, Focus on the Family does not own radio stations or television broadcasting facilities like many media companies. Focus on the Family simply provides programming that contains its Biblical message.

- f. In short, your purpose appears to be simply making facilities available on your campus so that your employees can conveniently engage in some religious activity in the course of their work day.**

Respectfully, with this statement you have once again made the type of ecclesiastical judgment that the Establishment Clause prohibits government from making. All of Focus on the Families' facilities are critical to its core purposes as elaborated above, including Focus on the Family's worship center at the heart of its campus where worship, prayer and religious instruction occur. Without question, Focus on the Family's members engage in "religious activity" all day, every day. The divide that you assume in your statement between religious activity and work is contrary to the religious views of Focus on the Family and its members. As early as Exodus 31:1-11 and 35:31-36:1, Scripture makes clear that work itself is Spirit-filled. Members see no distinction, spiritually, between gathering in small groups for prayer and devotions, or writing an article or producing a radio broadcast. All of these activities are religious in the sense that they contribute to Focus on the Family's mission of spreading the Gospel and strengthening families from a Biblical perspective. Focus on the Family believes that neither could succeed without the other.

To say that providing opportunity for religious activity is for convenience is to fundamentally misunderstand Focus on the Family. Throughout Christian history, it has been understood that "worship" is not merely the act of attending a church service; it includes anything that is associated with the mission of preaching the Gospel and serving others in the name of Christ. See Acts 2:42 ("They were continually devoting themselves to the apostles' teaching and to fellowship, to the breaking of bread and to prayer."); Justin Martyr, The First Apology of Justin (ca. 150 A.D.) ("And they who are well to do, and willing, give what each thinks fit; and what is collected is deposited with the president, who succors the orphans and widows and those who, through sickness or any other cause, are in want, and those who are in bonds and the strangers sojourning among us, and in a word takes care of all who are in need.") With that understanding, members engage in worship every day in performing their duties at Focus on the Family. Focus on the Family calls this the "work as worship" principle. Religious activity and the facilities designed for them are not merely incidental to Focus on the Family but the core type of activity that is the purpose of Focus on the Family and other churches.

I hope this response is helpful. As before, if you require additional information, please contact the undersigned at your earliest convenience. If for any reason you intend to make an adverse determination as to the requested reclassification, a conference with the appropriate Service employees is requested prior to your final determination.

Under penalties of perjury, I declare that I have examined this information, including accompanying documents, and, to the best of my knowledge and belief, the information contains all the relevant facts relating to the request for the information and such facts are true, correct, and complete.

Very truly yours,



Stuart Mendelsohn  
Partner  
Holland & Knight LLP

Attachments

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<sup>i</sup> Matt. 13:2; Mark 4:1

<sup>ii</sup> Acts 8

<sup>iii</sup> <http://www.christianity.com/church/church-history/timeline/1901-2000/kdka-made-religious-waves-11630722.html>

<sup>iv</sup> <http://desktoppub.about.com/od/history/a/The-Gutenberg-Bible.htm>

<sup>v</sup> [http://media.focusonthefamily.com/fotf/pdf/magazine/current-issue-fotf.pdf#\\_ga=1.201558545.1846684684.1471619488](http://media.focusonthefamily.com/fotf/pdf/magazine/current-issue-fotf.pdf#_ga=1.201558545.1846684684.1471619488)

<sup>vi</sup> [http://www.focusonthefamily.com/faith/becoming-a-christian/coming-home-an-invitation-to-join-gods-family#\\_ga=1.167933221.569782982.1453304502](http://www.focusonthefamily.com/faith/becoming-a-christian/coming-home-an-invitation-to-join-gods-family#_ga=1.167933221.569782982.1453304502)

<sup>vii</sup> <http://www.thetruthproject.org>

<sup>viii</sup> <http://www.familyfacts.org/briefs/8/marriage-and-poverty>

<sup>ix</sup> Matt. 5-7

<sup>x</sup> <https://biblemesh.com/blog/the-christian-origins-of-hospitals/>

<sup>xi</sup> [https://en.wikipedia.org/wiki/John\\_Wesley](https://en.wikipedia.org/wiki/John_Wesley)

<sup>xii</sup> <http://elationlighting.newslounge.eu/de/medienmitteilungen/news-detail/article/elation-lighting-upgrade-for-focus-on-the-family-s-chapel-tertia.html>

<sup>xiii</sup> [www.oaclub.org](http://www.oaclub.org)

<sup>xiv</sup> <http://www.clubhousejr.com/bible/the-fabulous-fruit-of-the-spirit.aspx>

<sup>xv</sup> <http://www.clubhousemagazine.com/en/truth-pursuer/friends-with-god.aspx>

<sup>xvi</sup> <http://www.focusonthefamily.com/media/adventures-in-odyssey#?curPage=13>

<sup>xvii</sup> <http://www.westhillsfriends.org/QVWminister.html>

Exhibit A

Focus on the Family Statement of Faith

We believe the Bible to be the inspired, only infallible, authoritative Word of God;

We believe that there is one God, eternally existent in three persons: Father, Son and Holy Spirit;

We believe in the deity of our Lord Jesus Christ, in His virgin birth, in His sinless life, in His miracles, in His vicarious and atoning death through His shed blood, in His bodily resurrection, in His ascension to the right hand of the Father and in His personal return in power and glory;

We believe that for the salvation of lost and sinful humanity, regeneration by the Holy Spirit through faith in Jesus Christ is absolutely essential.

We believe in the present ministry of the Holy Spirit by whose indwelling the Christian is enabled to live a godly life;

We believe in the resurrection of both the saved and the lost, they who are saved unto the resurrection of life and they who are lost unto the resurrection of damnation;

We believe in the spiritual unity of believers in our Lord Jesus Christ.

The Statement of Faith does not exhaust the extent of our beliefs. The Bible itself, as the inspired and infallible Word of God that speaks with final authority concerning truth, morality, and the proper conduct of mankind, is the sole and final source of all that we believe. For purposes of Focus' faith, doctrine, practice, policy, and discipline, our Board of Directors is Focus' final interpretive authority on the Bible's meaning and application.

**Focus on the Family Guiding Principles**

Additionally, Focus on the Family has a set of guiding principles that serves as the foundation of its ministry. Since Focus on the Family's primary reason for existence is to spread the Gospel of Jesus Christ through a practical outreach to homes, we have firm beliefs about both the Christian faith and the importance of the family. This ministry is therefore based upon six guiding philosophies that are apparent at every level throughout the organization. These "pillars" are drawn from the wisdom of the Bible and the Judeo-Christian ethic, rather than from the humanistic notions of today's theorists. In short, Focus on the Family is a reflection of what we believe to be the recommendations of the Creator Himself, who ordained the family and gave it His blessing.



Exhibit A

Focus on the Family Statement of Faith

The Six Pillars include:

**The Preeminence of Evangelism**

We believe that the ultimate purpose of life is to know and glorify God and to attain eternal life through Jesus Christ our Lord, beginning within our own families and then reaching out to a suffering humanity that needs to embrace His love and sacrifice.

"He said to them, 'Go into all the world and preach the good news to all creation.'" Mark 16:15

**The Permanence of Marriage**

We believe that the institution of marriage is a sacred covenant designed by God to model the love of Christ for His people and to serve both the public and private good as the basic building block of human civilization. Marriage is intended by God to be a thriving, lifelong relationship between a man and a woman enduring through trials, sickness, financial crises and emotional stresses. Therefore, Christians are called to defend and protect God's marriage design and to minister in Christ's name to those who suffer the consequences of its brokenness.

"'Haven't you read,' He replied, 'that at the beginning the Creator 'made them male and female,' and said, 'For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh'?"

So they are no longer two, but one. Therefore what God has joined together, let man not separate.'" Matthew 19:4-6

**The Value of Children**

We believe that children are a heritage from God and a blessing from His hand. Parents are therefore accountable to Him for raising, shaping and preparing them for a life of service to His Kingdom and to humanity.

"Has not the Lord made them [a husband and wife] one? In flesh and spirit they are His. And why one? Because He was seeking godly offspring." Malachi 2:15

**The Sanctity of Human Life**

We believe that human life is created by God in His image. It is of inestimable worth and significance in all its dimensions, including the preborn, the aged, the mentally disabled, those deemed unattractive, the physically challenged, and every other condition in which humanness is

Exhibit A

Focus on the Family Statement of Faith

expressed from the single cell stage of development to natural death. Christians are therefore called to defend, protect, and value all human life.

"For You created my inmost being; You knit me together in my mother's womb. I praise You because I am fearfully and wonderfully made." Psalm 139:13-14a

**The Importance of Social Responsibility**

We believe that God has ordained the social institutions of family, church, and government for the benefit of mankind and as a reflection of His divine nature. Therefore, Christians are called to support these institutions, according to God's design and purpose, and to protect them against destructive social influences. Such involvement is in obedience to Christ's lordship over all creation and is required by His command to care for the well-being of all people.

"For this reason a man will leave his father and mother and be united to his wife, and they will become one flesh." Genesis 2:24

"And God placed all things under His feet and appointed Him to be head over everything for the church, which is His body." Ephesians 1:22-23a

"Everyone must submit himself to the governing authorities, for there is no authority except that which God has established. The authorities that exist have been established by God." Romans 13:1

**The Value of Male and Female**

We believe that God created humans in His image, intentionally and immutably male and female, each bringing unique and complementary qualities to sexuality and relationships. Sexuality is a glorious gift from God to be offered back to Him either in marriage for procreation, union, and mutual delight or in celibacy for undivided devotion to Christ. Christians are called to proclaim the truth and beauty of God's design and the redemption of sexual brokenness in our lives and culture through Jesus Christ.

"Therefore, I urge you, brothers, in view of God's mercy, to offer your bodies as living sacrifices, holy and pleasing to God – this is your spiritual act of worship. Do not conform any longer to the pattern of this world, but be transformed by the renewing of your mind. Then you will be able to test and approve what God's will is – His good, pleasing and perfect will." Romans 12:1-2

Exhibit B

Focus on the Family Formal Code of Doctrine and Discipline

**MORAL POLICY** - *(Revised: 10/30/15)*

Forms referenced in this policy: Employee Notice of Divorce Form; Employee Notice of Separation Form

Searchable Keywords related to this policy: Behavior, principles, discipline, expectations

Other related information: None

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**POLICY STATEMENT**

Focus on the Family has always advocated and adhered to the highest standards of ethical and moral conduct, as reflected in its mission statement:

To cooperate with the Holy Spirit in sharing the Gospel of Jesus Christ with as many people as possible by nurturing and defending families worldwide.

Focus on the Family has a compelling interest in maintaining the biblical foundation and moral integrity of the ministry. Accordingly, it has adopted a Statement of Faith, Six Pillars, and the Campaign for Righteousness. It has also taken strong public positions regarding righteous living and moral behavior. In doing so, Focus on the Family has acknowledged and affirmed the significance of biblical standards concerning the character and conduct qualifications for its employees (I Timothy 3:1-13), including the avoidance of conduct which will bring criticism and condemnation to the body of Christ. As 1 Thessalonians 5:22 states, "Avoid every kind of evil."

As an employee of Focus on the Family, you have taken upon yourself the fearful and solemn prerogative of assisting the ministry to instruct others in matters of morality and family life. In so doing, each employee becomes accountable to a higher standard of conduct and fidelity than is required by most employers. As James writes in James 3:1, "Not many of you should presume to be teachers, my brothers, because you know that we who teach will be judged more strictly." In addition, Paul tells Timothy in Timothy 2:15, "Do your best to present yourself to God as one approved, a workman who does not need to be ashamed and who correctly handles the word of truth." The credibility of the ministry and the viability of the message of Focus on the Family are dependent upon the conformability of each employee to the behaviors and principles we proclaim.

## Exhibit B

### Focus on the Family Formal Code of Doctrine and Discipline

Moreover, ECFA's *Seven Standards of Responsible Stewardship* states, "In several of his letters, the Apostle Paul stresses the importance of being beyond reproach and behaving in such a way as to avoid even the appearance of wrong-doing. He tells us that we need to be circumspect to those outside the Church. The reason Paul most often gives is that we must not give Satan any opportunity to destroy the reputation of Christ. Arguably, and in an eternal sense, it may be true that the business of ministries and churches is of concern to God and not to others judging from the outside. However, Scripture is also very clear about our need to be open, honest, and above reproach as we wrestle with the issues of life before Christ's return. As the Apostle Paul said, "For we are taking pains to do what is right, not only in the eyes of the Lord but also in the eyes of men. (2 Corinthians 8:21)."

As an employee of Focus on the Family, you are a representative of the ministry in both your work life and your private life. Consequently, you must always be sensitive to how others see you from a biblical, spiritual, and ethical point of view – twenty-four hours a day, seven days a week. Titus 2:7-8 says, "In everything set them an example by doing what is good. In your teaching, show integrity, seriousness and soundness of speech that cannot be condemned, so that those who oppose you may be ashamed because they have nothing bad to say about us." Each employee must live a life demonstrating a committed relationship with God and a shared belief in biblical standards and the principles that guide the ministry's work. Employee behavior which falls short compromises the ministry's message and will not be tolerated. Proverbs 25:26 say, "Like a muddied spring or a polluted well is a righteous man who gives way to the wicked." Thus every employee, in every position, is required to abide by the moral behavior standards set forth in this policy.

#### **MORAL BEHAVIOR STANDARDS**

Any act which is inconsistent with biblical standards of moral conduct constitutes immoral behavior. Acts of immorality are inconsistent with the behavior required of employees, and this is true whether the activity occurs on or off the job. If there is any doubt about the appropriateness of a particular activity, an employee should bring the question to the attention of his or her supervisor, who will seek clarification and guidance as necessary from the Department of Ministry Values and Human Resources. Examples of immoral behavior include, but are not limited to, sexual relationships outside of marriage<sup>1</sup>, non-biblical divorce<sup>2</sup>, homosexual acts<sup>3</sup>, pornography<sup>4</sup>, transgender identity or expression<sup>5</sup>, theft<sup>6</sup>, lying<sup>7</sup>, drunkenness, illegal or improper use of drugs (including the improper use of prescription medications and illegal substances), recreational drug use (including marijuana and similar psychoactive substances, even when it's legal)<sup>8</sup>, spouse or child abuse<sup>9</sup>, and unjustified acts of violence<sup>10</sup>, and the use of

## Exhibit B

### Focus on the Family Formal Code of Doctrine and Discipline

Abortifacients<sup>11</sup> Other behavior that violates biblical standards of moral conduct also constitutes an act of immorality.

#### GENERAL ADMINISTRATION

##### **IMPLEMENTATION**

Department heads and supervisors, with advice and guidance from Human Resources, will be responsible for the implementation of this Policy. Actions inconsistent with this Policy constitute grounds for discipline up to and including termination.

\*There are certain positions, as noted in their job description that are classified as positions of authority. This is defined as employees who 1) serve in the office of Vice President or higher; 2) are required to maintain regular, high-level contact with donors or benefactors of Focus on the Family on behalf of the ministry; 3) represents Focus on the Family as a spokesperson; 4) makes regular appearances on behalf of Focus on the Family on public broadcasts; or 5) regularly writes columns or articles for Focus on the Family's publications. In these cases, consequences of moral policy failures (and all divorces) will be held to a higher standard.

##### **NOTIFICATION PROCEDURE**

###### **Legal Separation**

For the purposes of meeting the legal requirements of the Focus on the Family Health Plan and the COBRA regulations, an employee who has been granted a legal separation or divorce by the courts, should contact the Human Resources Benefits Department immediately. The Benefits Department is required by law to send legal notices to the employee's spouse based on the date the spouse loses eligibility in the health plan.

###### **Divorce Notification**

- A form has been designed to clarify the circumstances surrounding the employee's divorce.
- The employee will be asked to answer three questions regarding critical issues of the divorce.
- The employee must return the completed form to their Human Resources Representative when entering the divorce process.

Exhibit B

Focus on the Family Formal Code of Doctrine and Discipline

- If both spouses are employees of Focus on the Family, each spouse will be required to complete and sign individual notification statements.

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<sup>1</sup> Ex. 20:14; 1 Cor. 6:18

<sup>2</sup> Mal. 2:16

<sup>3</sup> Rom. 1:25-27

<sup>4</sup> Matt 5:28

<sup>5</sup> Gen. 1:27

<sup>6</sup> Ex. 20:15

<sup>7</sup> Pro. 12:22

<sup>8</sup> Pro. 20:1; Eph. 5:18

<sup>9</sup> Eph. 5:28-29; Col. 3:21

<sup>10</sup> Pro. 15:15 and 3:31

<sup>11</sup> Psalm 139:13,15

Exhibit C  
Focus on the Family Training and Mentoring Programs

## New Employee Mentoring Program Overview

### Concept

Focus has been blessed with a wealth of talent, experience, and wisdom as represented among its leadership and congregation. This program is an intentional effort to pass along vital knowledge and perspectives from select members of that group to the new generation of contributors and future leaders that the Lord has brought to the ministry. It offers a highly personalized approach to advancing two important ministry aims: providing professional development and growth opportunities, and helping newer members better understand and internalize Focus' values, philosophies, and culture.

### Goals

Following are the basic goals for mentoring partner participants:

- To encourage and stimulate professional and spiritual development
- To help them better apply their faith to all aspects of their work
- To give them a deeper understanding of Focus' culture and values
- To provide a safe place to ask questions, seek advice, and wrestle with challenges

For mentors, this affords them an opportunity to leverage their accumulated knowledge and insights by investing in the next generation of Focus leaders and contributors.

### Qualifications

Mentors are selected on the basis of their holding positions of leadership and/or influence, longevity with the ministry, commitment to living out their faith at work, understanding of the Focus culture, and exhibiting a warm, caring, approachable demeanor.

All individuals who have joined the ministry within the past year are given an opportunity—but are not required—to participate in the program as mentoring partners. Mentoring partner experience will vary significantly—for some, this may be their first regular job, while others come to Focus on the Family with a wealth of business, leadership, and/or ministry background. Level of experience will have significant bearing on the dynamic of the mentor-partner relationship.

### How the Program Works

Participants commit to meet twice monthly for a period of six months running from February-July. These one-hour meetings can be conducted over lunch or at another mutually agreeable time. (Meetings are paid time for non-exempt employees.) Mentors are responsible to initiate meetings. Mentors will be paired with a single mentoring partner of their same gender. Participants will be intentionally matched

Exhibit C  
Focus on the Family Training and Mentoring Programs

cross-departmentally to provide mentoring partners a broader understanding of and different perspectives on the ministry.

Mentors are required to do little or no preparation. Instead, they agree to share from their experiences and insights, successes and failures. A topical outline is provided for each meeting, and suggested discussion questions are offered as potential conversation starters. Mentoring partners may decide to pick and choose from among the most relevant questions or may prefer to come up with those of their own. Flexibility is encouraged, and there's latitude to set aside the scheduled topic if the mentoring partner has a need or desire to discuss a different subject, perhaps related to a new or pressing challenge they are facing.

The mentoring partner should guide the conversation; the mentor primarily serves as a helpful resource, sounding board, and encourager. The mentor should strive to put the partner at ease and to make the conversation a two-way street, asking about the partner's own experiences, challenges, and thoughts related to the topic at hand.

Mentors are encouraged to share freely, openly and honestly from their own experiences. However, they should be cautious in giving directive advice in specific situations, especially in those where expectations may differ across various areas of the ministry. Also, mentors should refrain from saying anything that could reflect negatively on another staff member, department, or the ministry as a whole. If serious work-related or personal issues arise, the mentor should direct the partner to the appropriate internal resources (Counseling, Human Resources, etc.).

Questions and Concerns

The New Employee Mentoring Program is a joint venture of Ministry Values and Human Resources. Please direct any questions or concerns to Ron Reno (Vice President, Ministry Values) or Jenn Scheck (Senior Director, Human Resources). We have received very positive feedback from previous program participants and look forward to seeing what the Lord will do through this upcoming round of mentoring relationships. Thank you for participating!



Exhibit C  
Focus on the Family Training and Mentoring Programs

## Professional Development at Focus (PD@F) Overview

### Summary

The PD@F program provides a variety of professional learning and growth opportunities over the course of one year for a small number of employees specially selected by the C-team. The program is jointly administered by Human Resources and Ministry Values. By design, participants take an active role in shaping their individual and group experiences. The program includes a mix of learning from established leaders as well as group interaction strategically designed for participants to sharpen one another (Proverbs 27:17). The various program components are outlined below.

### Group Meetings

The PD@F group will meet together every other month for two hours over an in-house catered lunch. The Ministry Values VP and Senior Director of Human Resources will facilitate these meetings. Meetings 2-4 will focus on preselected competencies for group development.

- Meeting 1 (Month 1): Trust-building and group dynamics. Also select the desired leaders to invite to the next three meetings (one per).
- Meeting 2 (Month 3): People management. Leader selected by group will join for a robust discussion/Q&A.
- Meeting 3 (Month 5): Decision making. Leader selected by group will join for a robust discussion/Q&A.
- Meeting 4 (Month 7): Spiritual character. Leader selected by group will join for a robust discussion/Q&A.
- Meeting 5 (Month 9): TBD. Group to select one additional leadership competency or other relevant topic for discussion. May or may not choose to invite a Focus leader or other outside party.
- Meeting 6 (Month 11): TBD. Group to select one additional leadership competency or other relevant topic for discussion. May or may not choose to invite a Focus leader or other outside party.
- Concluding lunch banquet (Month 12): To celebrate completion of the program, hear how each individual has benefitted, and to discuss improvements for the future. Supervisors are invited and encouraged to attend as well.

### Individual Mentoring

### Exhibit C

#### Focus on the Family Training and Mentoring Programs

Each employee (in coordination with their supervisor) will select a professional mentor, either internal or external to Focus. If within Focus, the mentor should be outside the employee's reporting structure. It is recommended that the two meet at least six times over the course of the year (in the months opposite the group meetings). Mentors should be chosen on the basis of professional competence, spiritual maturity, and expertise in the specific areas of aptitude selected for development.

It is recommended that meetings last roughly an hour, with at least one session each devoted to the targeted competencies. Other meetings could be a further exploration of those topics or could be devoted to purposeful discussion around other leadership themes as determined by the employee. HR can provide materials to aid in topical discussions. The mentor agrees to serve as a resource, but the employee is the one responsible for taking the initiative to arrange meetings and guide the discussion.

#### Selected Development Experience

The supervisor and employee should select at least one professional development opportunity in which the employee will participate in the coming year (to be funded, as necessary, by the respective department). Options include, but are not limited to: attendance at a leadership development conference; interviewing other Christian leaders (church or parachurch) outside Focus; seminars on specific skill-building (public speaking, people management, business acumen, etc.); visit to a local or statewide organization to observe operations; representing/speaking on behalf of Focus at a community event; taking an American Management Association class; etc.

#### Observation of Focus Leadership Meetings

In order to gain exposure to some of the key issues confronting Focus, and to observe how those issues are addressed by leadership, participants are expected to attend the following meetings over the course of the twelve months:

- Cabinet (3X—participants are invited to attend as it fits with their schedule)
- Strategy Team (1X—upon invitation)
- C Team (1X—upon invitation)

#### Team Retreat

Participants will engage in a half- or full-day offsite retreat to deepen group bonds and enhance team and individual leadership skills. The Center for Creative Leadership has been selected to

Exhibit C

Focus on the Family Training and Mentoring Programs

conduct these retreats initially, with a focus on “learning agility” under the premise that the best leaders are the best learners.

**“Bureaucracy Buster” Assignment**

Each team will tackle a TBD challenge at the ministry toward the goal of streamlining, increasing efficiency, or otherwise bolstering Focus’ day-to-day operational effectiveness. The outcome will be a recommended solution(s) or improvement(s).

**Timeline**

Six-person groups are launched in January and July of each year. A couple months prior to each launch, invitation meetings take place with the selected employees and their supervisors. The program, opportunity and expectations are outlined, and employees are invited to participate.

The supervisor and employee will shortly thereafter select individuals to conduct a 360 review of the participant. Based on the results of that review, the participant and supervisor together will select specific leadership competencies (at least one area of strength and one opportunity for improvement) on which to focus in the upcoming months. They will also use those findings to identify a mentor.

Exhibit D  
Focus on the Family Literature  
Top Bestsellers by Units Sold: 50,000+ Life-to-Date  
Through March 31, 2016

RANKING	BOOK	AUTHOR(S)	UNITS SOLD
1	LANGUAGE OF LOVE	SMALLEY, GARY & JOHN TRENT	534,211
2	RAISING MODERN DAY KNIGHT	LEWIS, ROBERT	517,928
3	THE WAY THEY LEARN	CYNTHIA TOBIAS	359,430
4	TWO SIDES OF LOVE	GARY SMALLEY & JOHN TRENT	319,047
5	HIDDEN VALUE OF A MAN	GARY SMALLEY & JOHN TRENT	300,512
6	GIANNA ABORTED AND LIVED	JESSICA SHAVER RENSHAW	274,787
7	KINGDOM MAN (BOOK & DEVOTIONAL)	DR. TONY EVANS	245,844
8	CREATIVE CORRECTION	LISA WHELCHER	238,899
9	SHE CALLS ME DADDY	ROBERT WOLGEMUTH	234,274
10	PARENTS' GUIDE SPIRITUAL GROWTH OF CHILDREN	FOCUS ON THE FAMILY	161,284
11	HEALING THE HURT IN YOUR MARRIAGE	DR. GARY & BARBARA ROSBERG	160,502
12	EVERY CHILD CAN SUCCEED	CYNTHIA TOBIAS	158,187
13	MOLDER OF DREAMS (BOOKS)	GUY DOUD	152,425
14	TAMING MONEY MONSTER	RON BLUE	146,828
15	KINGDOM WOMAN (BOOK & DEVOTIONAL)	TONY EVANS & CHRYSAL EVANS HURST	142,257
16	AIO NOVELS #1-12 & OMNIBOOKS #1-3	VARIOUS	134,816
17	CASTAWAY KID	R. B. MITCHELL	134,308
18	AN AFFAIR OF THE MIND	LURIE HALL	115,147
19	PURE EXCITEMENT	JOE WHITE	114,156
20	AFTER THE BOXES ARE UNPACKED	SUSAN MILLER	102,634

Exhibit D  
Focus on the Family Literature  
Top Bestsellers by Units Sold: 50,000+ Life-to-Date  
Through March 31, 2016

RANKING	BOOK	AUTHOR(S)	UNITS SOLD
21	FUEL	JOE WHITE	92,158
22	PEACEMAKING FOR FAMILIES	KEN SANDE	90,674
23	FAITH TRAINING	DR. JOE WHITE	88,562
24	BLESSING YOUR HUSBAND	DEBRA EVANS	87,224
25	AIO PASSAGES #1: DARIEN'S RISE (BOOK & DRAMA)	PAUL MCCUSKER	82,858
26	THE LOVE LIST	DRS. LES & LESLIE PARROT	78,743
27	DNA OF PARENT-TEEN RELATIONSHIPS	GARY SMALLEY & GREG SMALLEY, PSY. D	77,804
28	MEN: SOME ASSEMBLY REQUIRED	CHUCK SNYDER	76,908
29	GUIDING YOUR FAMILY IN A MISGUIDED WORLD	DR. ANTHONY T. EVANS (TONY EVANS)	76,431
30	GIVE THEM WINGS	CAROL KUYKENDALL	62,225
31	THEN GOD CREATED WOMAN/WOMAN'S SEARCH	DR. DEBORAH NEWMAN	61,176
32	HELPING YOUR CHILD SUCCEED IN PUBLIC SCHOOL	CHERI FULLER	57,335
33	THE WAY TO LOVE YOUR WIFE	CLIFFORD & JOYCE J. PENNER	56,862
34	PARENTS' GUIDE MENTORING TEENS	FOCUS ON THE FAMILY	54,356
35	MY TIME WITH GOD	FOCUS ON THE FAMILY	52,989
36	THE MOM YOU'RE MEANT TO BE	CHERI FULLER, CARLA WILLIAMS, & B.J. BASSETT	52,105
37	BEDTIME BLESSINGS	JOHN TRENT, PHD	50,149