

CCS Administrative Procedure

7.05.01-A Fund Raising for Charitable Purposes

Implementing Board Policy [7.05.01](#)

Contact: District Director of Fiscal Services, 434-5210

1.0 Purpose

To provide guidance in conducting fund-raising activities or events.

2.0 Limitations and Requirements

- 2.1 The Washington State Combined Fund Drive (CFD) and the CCS Foundation (Foundation) are the organizations through which CCS employees may donate to bona fide charitable organizations.
- 2.2 Activities to support charities other than the CFD and Foundation may be allowed provided the activity is approved in advance by an institution's executive or his/her designee.
- 2.3 The activity must be conducted for the benefit of a bona fide charitable organization. A charitable organization is defined, for the purposes of this policy, as a gift for humanitarian, philanthropic, or other purposes beneficial to the public. Also a charity may be an institution or organization founded by such a gift.
- 2.4 Activities related to food donation programs must be associated with qualified charitable organizations supporting the poor and infirm (RCW 69.80). Written acknowledgement must be obtained from the charity verifying the donation will be used to support the poor and infirm.
- 2.5 Any activity related to campaigning for election or promoting or opposing ballot propositions is prohibited. For additional guidance, refer to RCW 42.52.070, RCW 42.52.140, RCW 42.52.150(4), and WAC 292-110-010.
- 2.6 Upon approval of a fund-raising activity by an institution's executive, contact the District Director of Fiscal Services in the District Business Office. The Business Office will establish a separate agency (trust) account for funds raised. (*See Agency (Trust) Accounts, 5.20.01-B.*)

3.0 Student Organizations

- 3.1 Student organizations conducting charitable fund-raising must adhere to the rules outlined in the *Treasurer's Handbook: Procedures for Budget Control and Cash Handling for Student Organizations, Section H*.
- 3.2 Contact the District Director of Fiscal Services in the Business Office if there is uncertainty regarding the use of state resources for fund-raising activities for charitable organizations.

4.0 Use of State Resources

- 4.1 Washington's Ethics in Public Service Act, Chapter 42.52 RCW, prohibits the use of state resources to support outside organizations or groups, including charities, unless support is part of the employee's official duties, promotes organizational effectiveness, or the use of state resources is de minimis.

- 4.2 "De minimis use" occurs when all of the following conditions are met:
- 4.2.1 There is little or no cost to the District;
 - 4.2.2 Any use is brief in duration, occurs infrequently, and is the most effective use of time or resources;
 - 4.2.3 The use does not interfere with the performance of the administrator's or employee's official duties;
 - 4.2.4 The use does not disrupt or distract from the conduct of District business due to volume or frequency;
 - 4.2.5 The use does not disrupt other District employees and does not obligate them to make personal use of District resources; and
 - 4.2.6 The use does not compromise the security or integrity of District property, information, or software.
- 4.3 Examples of De Minimis Use
- 4.3.1 Use of an office computer to create a flyer of the activity.
 - 4.3.2 Print and place a flyer in break rooms and in approved common areas. (Must obtain prior approval before posting flyers.)
 - 4.3.3 Use of and placement of bins for collection of goods for donation. (Bins may not be purchased using CCS resources.)
 - 4.3.4 The agency uses a very limited amount of state paid time and agency resources to send an e-mail notifying employees of the fund-raising event and to post flyers in a break room.
 - 4.3.5 An e-mail sent to notify employees of a blood drive would be considered a limited and acceptable use of state resources. Another example might be a bake sale to support an Adopt-A-Family Program. Here, the baking would be performed at home and after working hours. The baked goods are then displayed for purchase during break times and the lunch hour. When gifts are purchased for the family, the purchases are made after working hours.
- 4.4 Examples of Non-De Minimis Use of State Resources¹
- 4.4.1 Any use of state resources that results in an expenditure of funds should be avoided. Consider this scenario: a group of employees spend six working hours of staff time a week for over a four-week period to plan a charitable fund-raiser, and use the computer, fax, and copier to produce fund-raising materials. This is an expenditure of state funds that would not be considered de minimis or limited use of state resources. In addition, state resources may not be used for the benefit of any other person, whether or not operated for profit, unless the use is within the course of official duties.
 - 4.4.2 The agency uses state paid time and agency resources to distribute multiple flyers to all agency employees. This is an ethical violation, as it does not meet the de minimis requirement.
- 4.5 Employees with questions regarding a particular proposed de minimis use of state resources for charitable purposes should contact the District Director of Fiscal Services.

¹ Examples were extracted from State of Washington Ethics Board FAQs.

5.0 Solicitations by State Employees

- 5.1 Washington's Ethics in Public Service Act prohibits charitable solicitations that may lead to the appearance that a donation may result in favorable treatment from the state (RCW 42.52.140).
- 5.2 State employees may not use their official state positions to solicit goods and services from private organizations or businesses.
- 5.3 It is recommended that faculty, staff, and student organizations perform fund-raising activities in their private capacities.
- 5.4 Examples of Allowable Solicitations²
- 5.4.1 On their lunch break or after work a group of employees who are involved in regulating or contracting on behalf of CCS solicit holiday gifts on behalf of a family sponsored by Adopt-a-Family. They do not solicit from CCS vendors or other individuals with whom they conduct state business. When soliciting the gifts they tell the businesses that they are soliciting on behalf of the sponsored family or Adopt-a-Family. **This is not an ethical violation.** By soliciting on behalf of the private charity and not a state agency they are not using their state positions to influence the private businesses. In addition, the employees are not using state paid time or resources for the solicitation.
- 5.4.2 After work or on the weekend a group of state employees solicit holiday gifts on behalf of a family sponsored by Adopt-a-Family or their local private school. They solicit door-to-door in their neighborhood and do not solicit from CCS vendors or other individuals with whom they conduct state business. When soliciting the gifts they indicate that they are soliciting on behalf of the private school, the sponsored family, or Adopt-a-Family. **This is not an ethical violation.** The employees are not using their state positions to influence the private businesses and are not using state resources to support the private charities.
- 5.5 Examples of Non-Allowable Solicitations²
- 5.5.1 An employee is active in a local PTA organization that holds fund-raising events to send children to the nation's capital. Although a parental payment of expenses for the trip is expected, the more raised through individual contributions, the less the parent must pay. The employee uses CCS e-mail to solicit contributions to the fund-raiser from a broad distribution list of co-workers. The e-mail asks each recipient to pass along the e-mail to other state employees. **This is an ethical violation.** The employee is using state resources to promote an outside organization and a private interest. By sending the e-mail to other state employees and asking state employees to pass the solicitation along, the employee is asking other state employees to improperly use state resources in a manner that interferes with the performance of official duties.
- 5.5.2 The purchasing office sends a letter requesting gifts or donations for use at a CFD kick-off luncheon to several vendors who provide goods and services to CCS. **This is an ethical violation.** While the purchasing supervisor will not personally benefit from the gifts, the CFD charities and the gift recipients would benefit from them. In addition, it would be reasonably expected that vendors who respond favorably to the solicitation did so with the intent to influence the vote, action, or judgment of the purchasing supervisor.

² Examples were extracted from State of Washington Ethics Board FAQs.

- 5.5.3 A CCS executive sends a letter to local businesses, including several vendors who provide goods and services to CCS, requesting gifts or donations for a use that will benefit CCS employees and a private charity. ***This is an ethical violation.*** While the executive will not personally benefit from the gifts, the private charity would benefit from them. In addition, it would be reasonably expected that vendors who respond favorably to the solicitation did so with the intent to influence the vote, action, or judgment of the executive. This expectation of the vendors would be true even if the executive did not routinely participate in such decisions.
- 5.5.4 On their lunch break a group of employees who work for an agency that regulates or administers benefits for private business, but who are not personally involved in regulating or administering benefits for their agency, solicit holiday gifts on behalf of a family sponsored by Adopt-a-Family. When soliciting the gifts they voluntarily inform the businesses that they are employed by their state agency, but are soliciting on behalf of the sponsored family or Adopt-a-Family. ***This is an ethical violation.*** By stating that they are employed by an agency that regulates or administers benefits for the private businesses they are using their state positions to influence the private businesses and support the private charity.

6.0 Related Information

- 6.1 Chapter [42.52 RCW](#) – Ethics in Public Service
- 6.2 Washington State [Executive Ethics Board](#)
- 6.3 Administrative Procedure [5.20.01-B](#) – Agency (Trust) Accounts
- 6.4 [Treasurer's Handbook](#): Procedures for Budget Control and Cash Handling for Student Organizations.