

## 3.7 STUDENT ORGANIZATION FINANCIAL OPERATIONS AND STUDENT FUNDRAISING POLICY

Saint Louis University expects all student organizations to be conscientious and responsible financial stewards. This includes appropriate management of University funds, including allocation from the Student Activity Fee, individually collected dues, and/or fundraised monies. There are several structures in place which promote both training and education for the leaders of these organizations, and professional staff who are available to assist with their financial management.

Each Recognized and Developing Student Organization (DSO) will be assigned a University operating fund, which permits them to do financial business under the name of "Saint Louis University." (Note: DSO fund numbers will be transitioned and remain with the organization when they become Chartered.) Because of this, the University does not recommend that organizations operate outside, third party bank accounts. Because these accounts would need to be established by individuals and must be transitioned appropriately with the respective banking institution, the University cannot assist with fund access or assignment. This presents a liability to the specific student organization where the University can likely not assist. If an organization elects to maintain an outside, third party bank account, University funds (operating or allocated fees) cannot be deposited into these accounts. Thus, organizations are strongly encouraged to utilize the assigned University funds.

Many of the specific financial procedures for student organization (i.e. budgeting, spending, reimbursements, reserving a Procurement Card, etc) can be found in SLU Groups. CSOs will receive training on these procedures, and more, during SGA's sponsored Leaders of the Pack training workshop in the fall semester.

### A. Financial Operations for Recognized, Developing, and/or Chartered Student Organizations

- a. Recognized, Developing and Chartered will be permitted to utilize the University's tax exempt status for related purchases and expenses. To obtain a copy of the University's tax exempt documentation, please contact the Student Involvement Center at [involvement@slu.edu](mailto:involvement@slu.edu).
- b. There are multiple ways an organization may utilize and access monies from their University fund:
  - i. Request a University Procurement Card: Select departments and units have University issued credit cards for the purpose of University purchasing. Student Organizations may request use of these cards, and with appropriate permission, the transaction can be reconciled to their University fund.
    1. It is important for students to know that University Procurement Card transactions must be tax-free. If a purchase is made with tax included, they may be asked to return to the vendor to reprocess the transaction as a tax-free purchase.
    2. There are restrictions on the type of transaction and/or purchase which can be made on a University Procurement Card. Please consult with (INSERT LINK) to ensure a purchase is approved for p-card payment.

- ii. Reimbursement Request: Students may decide to make organizational-related purchases, utilizing their own financial resources. They may then submit documentation and/or receipts for a reimbursement from their University fund. If students wish to utilize this, it is recommended that they speak with the department responsible for issuing the reimbursement to ensure that their purchase is approved and considered a reimbursable expense. For CSOs, they will be asked to justify their reimbursement against their approved annual funding budget. If they are unable to connect a purchase to a specific line-item from their budget, their reimbursement request may be denied.

1. The University will not honor reimbursement requests which include sales tax. Students are encouraged to use the University's tax free letter documentation to ensure they do not pay for tax, as they will not be reimbursed for that portion of their receipt.

- iii. Procurement Request (for check-issued payment and/or ACH deposit): Students can also request payment for organization expenses by working with a sponsoring department/unit and submitting a procurement request. Vendors who are due payment must submit the University's Master Vendor Form, and have a Vendor record created to be eligible for payment.

- c. There are times when an organization may wish to contract services with an individual, agency, vendor, or alternative provider. When this occurs, the University requires a Standard Service Agreement (SSA) be issued to outline the legal responsibilities of the Vendor and University.

- i. Students are not authorized to enter into formal and/or legal agreements on behalf of the University, which includes their student organization.
- ii. Students should work with a sponsoring department or unit, or consult with their advisor, in order to formally initiate a SSA.
- iii. Because an SSA is a legal document issued on behalf of the University, it may need additional review by alternative University departments, including but not limited to Business & Finance, Risk Management, or the Office of General Counsel. Because of this, it is recommended that SSA's be initiated a minimum of 60 days prior to the anticipated event/service date.
- iv. The University utilizes an electronic contract management system, which is how agreements are tracked, exchanged and signed. All agreements signed on behalf of the University must be maintained in this electronic database.
- v. Per the University's SSA, payment terms are listed as "Net 30," meaning that payment is not due for 30 days from the SSA's execution date (the date of last signature).

To ensure the proper use of the University name in fundraising ventures, to minimize the inconvenience of donors and streamline communication by various University groups, and to assure proper adherence to state and municipal laws, the following policies are established.

These policies and procedures pertain to fundraising ventures entered into by Chartered Student Organizations, either on or off campus.

### A. Purpose

The purpose of this Policy is to prevent inconveniences and disturbances to Saint Louis University's donors and other stakeholders with multiple contacts soliciting donations by various

groups within the University's community, to protect the good name and reputation of the University, and to maintain the University's ongoing compliance with its legal and statutory obligations.

Saint Louis University is a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code and is therefore strictly prohibited from intervening, directly or indirectly, in support of or opposition to the political campaign of any candidate or group of candidates for elected public office. Recognized Student Organizations are therefore also strictly prohibited from using any of the University's facilities, resources and services, including its names, marks and logos for political campaign purposes, including, without limitation, the endorsement or solicitation of goods and services or any other commitments, financial or otherwise.

#### B. Scope

This Policy covers any and all fundraising activities conducted by recognized Student Organizations whether alone or in conjunction with a third party, regardless of the activities' location, that are for the benefit of the Student Organization, the University community at large, or outside organization that is tax-exempt under Section 501(c)(3) of the Internal Revenue Code.

Any Student, recognized Student Organization, or group of two or more SLU Students may sponsor a fundraising activity. This Policy applies to all fundraising activities conducted by any of the aforementioned sponsors, whether conducted on or off University premises or with the use of University resources for fundraising.

Students who are organized as part of a team that is sponsored by a recognized Student Organization are exempt from needing to obtain approval from the Student Involvement Center for their fundraising activity, unless said approval is expressly outlined in the above sections of this Policy for the following:

- Use of Saint Louis University's names, registered marks and logos on reference to items for sale;
- The sale of baked goods and other food items requiring preparation;
- "Door to Door" sales;
- Obtaining and using University phone or mailing lists, email lists, listservs, and bulk mail services to contact alumni, individuals, foundations, or corporations;
- Raffles and drawings.

These Student teams are still required to follow the guidelines set forth in the previous sections of this Policy. Examples of Student teams would be for such sponsoring organizations as SLU Relay for Life or SLU Dance Marathon.

#### C. Definitions

Fundraising, for purposes of this Policy, is defined as

- any solicitation for financial or other commitments for the provision goods;
- in-kind donations or services;
- the sale of goods and services (including event ticket sales);
- raffles, prize drawings and auctions;

- the collection of membership dues and fees, whether the proceeds from which are intended for the benefit of recognized Student Organization or are to be used by sponsoring recognized Student Organizations or to make as a donation to a tax-exempt charitable organization under Section 501(c)(3) of the Internal Revenue Code.

1. **Internal Fundraisers** are fundraising activities that are intended for the benefit of organizations within the University community or the University community itself.
2. **External Fundraisers** are fundraising activities that are intended for the benefit of other groups and organizations from outside of the University community, and must be tax-exempt charitable organizations under Section 501(c)(3) of the Internal Revenue Code.

The proceeds of Fundraising activities that are intended to benefit an outside organization must be paid directly to the organization in the form of a check, unless, pursuant to a written agreement with the outside organization, such funds are to be collected directly by the outside organization, in which case the outside organization must provide a detailed accounting of the funds collected.

Student Organizations seeking to collaborate in Fundraising activities with third parties and individuals from outside of the University community (e.g., profit shares) must obtain the prior written approval of the Student Involvement Center in accordance with Fundraising approval processes that may be established by the Student Involvement Center. At a minimum, requests for approval must contain a detailed written description of the proposed fundraising activities, the organization(s) who will benefit from the proceeds, and how the proceeds are to be used.

3. **Profit shares**, for purposes of this Policy, are defined as any arrangement where a third party or commercial business shares some of its profits with a Student Organization for the purposes of raising money toward a cause.
4. **Sales**, for purposes of this Policy, shall include, without limitation, the sale of any goods and services, tickets to fundraising events, and chances in a raffle or prize drawing, whether by direct sale or auction.

Sales activities must be conducted in accordance with all municipal, state and federal laws and University. Fundraising activities, which entail "Sales," must receive the prior written approval of the Student Involvement Center. Sales activities may only be conducted from behind a table, and only in those locations specifically designated by Event Services. "Door-to-door" sales include, but are not limited to, approaching individuals and groups on University premises or calling on individuals and groups in their offices and residences, are prohibited except as may be expressly authorized by the Student Involvement Center.

The sale of food items that are made or prepared by an organization must meet all laws and regulations for the safe handling and preparation of food items. Sponsoring Student Organizations are solely responsible for obtaining any

required authorizations and licenses from the City of St. Louis Department of Health. The Student Involvement Center will be available to advise organizations on the process for contacting the City of St. Louis Department of Health.

Any and all sales for the purpose of fundraising must be conducted directly (person-to-person) by a Student member of the sponsoring organization.

Any uses of Saint Louis University's names, registered marks, and logos used on, or in reference to any items or services for sale must receive prior written approval from the University's Marketing and Communications Division. The name "Saint Louis University," and the names of campus buildings and areas may be used for the purpose of providing directions to the location where the fundraising activity is to be conducted. The sponsoring organization must clearly indicate in all announcements and promotional materials and at the point of sale, that Saint Louis University, as a matter of Policy, will not endorse or provide its approval of any products or services, or any of the providers thereof.

5. **Solicitation**, for purposes of this Policy, is defined broadly to include any request express or implied, of any contribution, financial or in-kind, that is made in person, via the mail, telephone, email, or any other means of communication.
6. **In-Kind Contributions**, for purposes of this Policy, is defined broadly to include any type of non-cash contribution or donation of goods, services, or any other commitment which can be assigned a cash value.

Individuals and groups must be sponsored by a recognized Student Organization and must be approved by the Student Involvement Center in order to conduct fundraising activities on University premises.

Students are strictly prohibited from using any University phone, mailing lists, email lists, listservs, and bulk mail services for fundraising purposes.

7. **Collection of membership dues and fees**, requiring members to provide personal funds in order to participate in a recognized Student Organization and/or activity.

Only recognized Student Organizations are permitted to collect membership dues. The purposes of these funds may be used in support of the organization's sponsored activities, recruitment activities, etc.

Funds collected in this manner do not need to be approved by the Student Involvement Center. Recognized Student Organizations that hold accounts with Saint Louis University must deposit these funds into the recognized Student Organization's account through the Student Involvement Center with clear descriptions on how and in what manner the funds were collected.

A raffle, or prize drawing is a type of lottery in which chances are sold, and the prizes awarded are goods or services rather than money. Raffles or prize drawings may be permitted in certain limited circumstances. Fundraising activities that involve elements of chance, will require that strict oversight measures be put into place to maintain the organization's and University's ongoing compliance with all applicable laws and regulations. The types and number of such measures shall be determined by the Student Involvement Center in consultation with the Vice President for Student Development.

#### D. Policy

The sponsor of a fundraising activity must complete a request form and obtain approval for the fundraising activity from the Student Involvement Center. Recognized Student Organizations submitting requests for approval of fundraisers should take into account the purpose, process, and manner in which they plan to raise the funds.

Any fundraising activities that involve the sale or distribution of alcoholic beverages or promote the consumption of alcoholic beverages is strictly prohibited. Fundraising activities may not be conducted at or in conjunction with any establishment for which the sale or distribution of alcoholic beverages is a specific focus of their business.

#### E. Guidelines

Fundraising must provide a benefit to the University community and be consistent with Saint Louis University's mission as a Catholic, Jesuit institution and comply with all applicable local, state, and federal laws and University policies, rules and regulations.

1. Fundraising activities may not disrupt or impair University operations or services.
2. Overbearing, coercive, or intimidating Fundraising practices will not be tolerated and taking part in such actions may result in University disciplinary and legal consequences.
3. Students who wish to enter into a contract with a third party to host, co-sponsor, profit-share, speak, perform, or present as part of their fundraiser must first obtain approval from the Student Involvement Center through the fundraising approval process.
4. All fundraising contracts must be reviewed and approved by the Student Involvement Center prior to their execution or the commencement of any fundraising activities. Fundraising activities must be conducted in compliance with any instructions, limitations, and conditions for their conduct that may be established by the Student Involvement Center in consultation with the Vice President for Student Development.
5. When conducting fundraising activities off of Saint Louis University's campuses, Students must obtain prior written permission from the University in order to identify themselves as Saint Louis University Students. Such permission will identify the specific Student or Students conducting the Fundraising activity indicating that they are Saint Louis University Students, the Student Organization with which they are affiliated, and the intended use or beneficiary for the proceeds. Students conducting fundraising activities may request a letter from the University identifying them as members of a specific,

recognized Student Organization and the specific purpose and beneficiary for which they are raising funds. Students must show their Saint Louis University ID to help identify themselves as a member of the Saint Louis University community.

6. Recognized Student Organizations' fundraising proceeds must be used in a manner that is consistent with the official purpose of the organization and in accordance with all applicable rules and policies of Saint Louis University. An accounting of any funds raised must be provided to the Student Involvement Center within five (5) business days after the event.

#### **F. Procedures**

Recognized Student Organizations seeking the required permissions and approvals for a proposed Fundraising activity must follow the procedures set forth below:

1. Students must submit a fundraising event in SLU Groups, sharing all details of the planned fundraising activity. This should be done at least twenty (20) business days prior to the commencement of the proposed fundraising activity.
2. The Director for the Student Involvement Center, or designee, will conduct an initial review of the form and may request additional information and documentation from the sponsoring Student Organization.
3. Following approval by the Student Involvement Center, Students may apply to reserve a campus venue for the fundraising activity in accordance with the policies and procedures of the Department of Event Services, located in Busch Student Center, Suite 313.

Failure to comply with any of these guidelines may result in a referral being made to the Office of Student Responsibility and Community Standards. In some instances, an organization and/or its individual members may be referred for concurrent conduct proceedings.