

John Carroll University

Student Organization Fundraising Policy

General Information

Recognized and registered student organizations are permitted to sponsor fundraising activities. A fundraiser is any attempt by a recognized student organization to raise money either to support a program or event or to benefit a charity. Prior to commencing fundraising activities, a Fundraising Form must be completed for any such attempt to raise money or collect other goods for donation, either on- or off-campus.

Fundraising activities may only benefit a student organization and may not be for an individual's personal gain. Personal gain is defined as the sale of goods or sponsorship of any fundraising activity on University property by any individual or group that is intended to improve the personal financial status of any person or group of persons involved in the sponsorship of the activity. Fundamental to this definition is the premise that funds raised by student organizations are to be used to expand or enhance the activities of those organizations and not to financially subsidize an individual's personal interests or needs.

The Office of Student Engagement must approve all fundraising activities sponsored by student organizations through completion and approval of a Fundraising Form. Fundraising activities must be consistent with the mission of John Carroll University, and align with all local, state, and federal laws and ordinances. Fundraising activities are required to have published start and end dates, with a typical maximum of seven days. Exceptions to this length of time must be approved by the Office of Student Engagement.

There are three different types of fundraising activities: internal fundraisers, external fundraisers, and solicitations, donations, or in-kind contributions.

Internal Fundraisers

Internal fundraisers are defined as events sponsored to raise money for internal organizational use (e.g., operating expenses, organizational activities, etc.)

1. Contributions to internal fundraisers are typically not treated as tax deductible gifts. Student organizations may not rely on the University's tax exempt status in organizing or operating such an event and shall in no way imply that the University is a sponsor of the event.
2. The net proceeds of the fundraiser are to be dedicated only to funding the organization's activities that align with the organization's stated purpose(s).
3. No lotteries or sweepstakes may be held and a raffle may only be held with the pre-approval of the Office of Student Engagement. An event involving all three of the following: (1) an entry fee, (2) a prize, (3) chance/luck, may fall under the legal definition of gaming, which is regulated by state law. Please contact the Office of Student Engagement to determine if a proposed event would be considered a "raffle" or illegal gambling.
4. Fundraisers that promote the use and/or sale of alcohol (e.g., happy hours) will not be approved.
5. Fundraisers involving credit cards (e.g., credit card applications) will not be approved.
6. All applications must be submitted to the Office of Student Engagement for approval at least two weeks prior to the fundraising activity by completing the Fundraising Form.

External Fundraisers

External fundraisers are defined as events sponsored to raise money or collect other goods for charitable, tax-exempt organizations external to the University.

The following policy allows recognized student organizations to use University facilities and sponsor events to

raise money for another tax-exempt charitable, educational, or religious off-campus organization as defined under the Internal Revenue Code Section 501(c) (3).

1. The proposed recipient must be an IRS-recognized 501(c) (3) organization. A copy of the IRS determination letter verifying this status must be submitted with the application. All commercial or political activities or organizations as well as unorganized or unrecognized public groups irrespective of their avowed aims or purposes are strictly excluded as recipients.
2. The funds devoted to such purposes are to be confined to the net amounts realized from voluntary contributions made to such activity, and may not include any sums budgeted or allocated out of student activity fees, residence hall fees, or other general University revenues. The use of University resources, if any, must be efficient and proportionate in the judgement of the Office of Student Engagement.
3. Contributions to external fundraisers must be made payable directly to the external charitable organization and charitable organization when possible. Contributions may not be made payable to the University. The student organization and charitable organization shall in no way imply that the University is a sponsor of the event.
4. No lotteries or sweepstakes may be held, and raffles require additional pre-approval. An event involving all three of the following: (1) an entry fee, (2) a prize, (3) chance/luck, may fall under the legal definition of gaming, which is regulated by state law. Please contact the Office of Student Engagement to determine if a proposed event should be considered a "raffle" or illegal gambling.
5. Fundraisers that promote the use and/or sale of alcohol (e.g., happy hours) will not be approved.
6. All applications must be submitted to the Office of Student Engagement for approval at least two weeks prior to the fundraising activity by completing the Fundraising Permit.

Additional Requirements for Raffles

A limited number of raffles may be permitted each year for student organizations to raise money for organizational activities or another tax-exempt charitable organization. The following guidelines apply to all raffles:

1. The following information must be documented and submitted to the Office of Student Engagement:
 - a. the contents of each raffle item;
 - b. the money raised in the sale of tickets for the raffle;
 - c. the name and phone number of the winner of each item; and
 - d. a copy of the transaction log showing the money was transferred to the designated beneficiary.
2. Raffle tickets cannot be sold online and can only be sold/paid for in person regardless of payment method or signup method.

Solicitations, Donations or In-Kind Contributions

These are defined as asking for funds or donations of goods or services for internal organizational uses, activities, or in support of an approved internal or external fundraiser.

The following policy provides a means for recognized student organizations to occasionally solicit funds or contributions (in contrast with conducting a fundraising activity or event) from students, faculty/staff, alumni, individuals who are not alumni, parents, corporations, and/or foundations, for the student organization's internal use directly related to its stated purposes, for an approved campus event, or in support of an approved internal or external fundraiser.

In addition to the guidelines delineated in this policy for applicable Fundraisers, requests for solicitation of monies by recognized student organizations may be considered for approval by the Office of Student Engagement provided they meet at least the following requirements:

1. The net proceeds of the fundraiser are to be dedicated only to funding the organization's activities that align with the organization's stated purpose(s), or for a previously approved campus project.
2. No solicitations will be made or given for the benefit of any commercial or political organizations or activities; or unorganized public or private groups irrespective of their avowed aims or purposes.
3. Funds requested are to be derived from voluntary contributions specifically made to meet the purposes of the approved solicitation.
4. Solicitation of student organization's own members (e.g. membership dues) does not require approval from the OSE. Solicitations of any person or entity other than a student organization member (e.g. faculty/staff, alumni, individuals who are not alumni, parents, corporations, foundations), require review and approval from the OSE, in consultation with University Advancement, as appropriate.
5. All applications must be submitted for approval at least two weeks prior to the fundraising activity by completing a Fundraising Permit.
6. Solicitations or in-kind contributions (e.g. donations of gift certificates, products or services) must also comply with this policy. Student organizations are permitted to individually approach local businesses to donate gift cards, tickets, certificates or goods to use as prizes in their fundraising events. However, the maximum monetary value of items that a local business can provide to an organization for a single event typically cannot exceed \$100 for cash equivalents such as gift cards or \$300 for in-kind gifts. If you have a large or unusual in-kind gift, you should seek prior approval from the Office of Student Engagement.
7. Door-to-door solicitation is **strictly prohibited**. Door-to-door solicitation includes the distribution of any materials, handbills, flyers or literature.
8. Students are strictly prohibited from using any University phone or mailing lists, email lists, listservs, and bulk mail services for fundraising purposes.

Generally Applicable Guidelines for All Fundraising:

Crowdfunding

Fundraising activities that include the use of crowdfunding type activities (such as gofundme) or the solicitation of funding requests via 3rd party websites or tools are not permitted. John Carroll University organizations that wish to solicit support via web or electronic payment platforms should use the resources available from within the University. Contact the Office of Student Engagement for more details.

Political activity

Student organizations are not permitted to engage in fundraising activities to support a candidate for public office, political party or ballot issue, and/or further may not donate directly to a candidate for public office, political party, or ballot issue.

Apparel Standards

Promotional materials, apparel and/or product sales must be in compliance with the [Purchasing Guidelines](#) and copyright law.

Deposit of Money Raised

Within a week of collecting funds, student organizations must deposit any collected cash from fund raisers into their Student Organization account at the Cashier's Office and bring the deposit receipt to the Office of Student Engagement, where it will be attached to the initially approved fundraising form.

Electronic Collection of Funds

Venmo or comparable platforms may be used by student organizations to collect money from students for

fundraising purposes with the prior approval of the Office of Student Engagement, which may impose additional guidelines at its discretion. However, the following basic guidelines must be followed in all instances:

1. The money must be collected in a way that avoids unnecessary comingling with personal funds; and
2. Within two weeks of the money being transferred, a full transaction log showing that the money was collected and then transferred out of personal accounts must be printed out and brought to the Office of Student Engagement, where it will be attached to the initially approved fundraising form.

A/O 3/9/2021