

BELLEVUE SCHOOL DISTRICT Fundraising FAQ (Updated 10.31.17)

This Frequently Asked Question (& Answer) document has been prepared to help address many of the commonly asked questions received about fundraising and auctions in an effort to explain the District's guidance found in Board Policies 2025, 3420, 3515, 3530, 6102 and 6114, Washington State ASB regulations, and to help staff plan these activities.¹

1. I know a wonderful charity (Boys and Girls Club) that would like to set up a collection box at the front office. Can I do this? Can schools set up a box for clothing or food drives?

We do NOT allow outside organizations to come into our schools to promote their own charitable efforts – no matter how wonderful. Our student ASBs (or student councils²) can decide to engage in fundraising for charitable organizations or for individuals needing support only if the decision is a student led initiative and the fundraising receives prior approval from the student council advisor and the school administrator. With the requisite approval, students can then engage in charitable collections like this, but outside non-profits cannot have that access.

Examples of school student governments or ASB organizations engaging in fundraising at school include hurricane relief, Adopt-a-Family efforts during the holidays and supporting a student's family after their house burned down.

Schools can set up collection boxes if they are student initiated or the school initiates the collection itself. The principal must approve of the collection boxes and their placement within the school. Boxes should not be set up in the office and not in a hallway or other emergency access area.

2. An employee knows a great charity and wants to ask his/her students to collect blankets, clothes, food, (or whatever) for this great cause. Can I ask my students to do this? If not, why not?

We cannot ask our students to fundraise for or donate to outside organizations.

Administrative Policy 3530 – Fundraising Activities Involving Students – states: “solicitation and collection of money by students for any purpose including the collection of money in exchange for tickets, papers, magazine subscriptions, or for any other goods or services for the benefits of an approved school organization may be permitted by the superintendent, providing that the instructional program is not adversely affected.”

3. What about staff? Can staff members collect donations?

Staff *can* collect donations among themselves for outside organizations if they want, but not during student time or in classrooms and staff cannot use district time, computers/technology or resources to do so.

4. Can I conduct a fundraiser or ask for donations at a school concert so that I can buy a piano for my school music program?

If you follow the procedure for conducting fundraisers such as submitting a fundraising application, principal approval, and follow cash handling procedures, this would be allowable. However, you may not require a donation as a condition of attending the event.

5. Can we give a gift card as a prize or award so long as it is nominal?

No. Depending upon the circumstances an award (and sometimes a prize) may be offered. Awards are for recognition and Policy 3515 requires that they must be de Minimis (“the District will consider any prize or award amount equal to or less than \$15.00 (fifteen) dollars (including tax and shipping) to be de Minimis”); the District recommends plaques, thank you letters, etc., rather than spending money. Sometimes a heartfelt thank you letter is more meaningful than some type of trinket. Prizes might be built into a fundraiser and offered by the vendor. Prizes (like a chance to win a fruit basket) may fall under raffle or gambling rules so discuss any prize with the business office prior to entering into the arrangement.

¹ Not all questions can possibly be addressed in this document in detail, and there can be a different answer given additional information. This document tried to address at least some of those commonly asked questions and to give a framework of issues that need consideration. Please contact your principal for other issues.

² ASB and student council are used interchangeably throughout this document.

6. Why are our students able to fundraise through their student councils?

State regulations allow this, but only our ASBs can collect “private monies” (i.e., for donations to a private cause) in accordance with ASB rules, which schools must carefully follow to fundraise. Coin drives and other student fundraising activities require substantial support from the building office manager or accountant. The capacity of the office staff to support the proposal should be considered when deciding whether to proceed with these types of activities.

7. So what do I tell my students if they come to me and tell me they want to fundraise for a certain organization (e.g., hurricane relief efforts)?

Direct the students to approach the ASB and ask the student council or ASB club/organization to vote on whether to approve the fundraising for that specific organization. The results of this vote should be reflected in the organization’s meeting minutes. Students should then seek the school administrator’s approval for the fundraiser.

It is important that the recipient charity be selected before the fundraising so that those contributing understand what they are supporting and that the charity is prominently advertised at the time the money/donation is collected. Promotional literature and signage at collection points should clearly state where the money is going, so contributors do not assume they are supporting programs at the school.

Any funds raised must first be deposited in the school’s ASB charitable account before distribution to the selected charity. Related expenses may be deducted from this account, and then all net proceeds should be disbursed to the outside organization in a timely manner (preferably by the end of the school year). No remaining funds can be used for other purposes. Contact the District’s Accounting Office if there are questions about how this must work.

8. What if my elementary school does not have an ASB?

Not all of our elementary schools have formally organized ASB clubs (but all do have ASB accounts and budget capacity). ASBs at elementary schools do not need a constitution. The school administrator is responsible for granting or denying approval and for managing the ASB activities. The principal should consult with the District’s Accounting Office to obtain the correct budget code for the school’s ASB charitable account. Take care to involve the students as much as possible in ASB decisions.

9. What about PTSAs or the Bellevue Schools Foundation? Can they fundraise at our schools?

PTSAs and BSF are not considered outside organizations for fundraising purposes; however, they are still subject to appropriate guidance. If the parents have initiated the fundraising event, then it is a PTSA event. The school administrator must approve PTSA fundraising events held at the school, and revenue deposited into a PTSA account by the parents. Students may assist the parents/guardians, but if student involvement is critical to the success of the fundraiser, it would most likely be considered an ASB fundraiser, and the money raised must be deposited into the ASB account. Further, to be a PTSA fundraiser, the parents must have been involved in the creation and planning of the activity as well as the implementation, operation, and management of the activity, and the majority of manpower must be provided by the organization’s non-student volunteer members. Students may not collect money for the PTSA. PTSA fundraising cannot occur during school hours except under very limited situations as described below.

PTSA’s traditionally sponsor book fairs in conjunction with an elementary school or as part of an author reading at school. In addition, elementary PTSA’s sponsor walk-a-thons and sales (of such things as gift wrapping supplies or baskets). Student instructional time should be protected, but lunch times and recesses may be used to promote the venture, so long as there is no undue pressure put on students. Prizes for students are allowed if a vendor provides a prize appropriate for the students. It is important to keep in mind that instruction, rather than fundraising, must be our highest priority.

10. Can we transfer donations collected by using a credit card through an on-line site?

No. If a school collects money, in accordance with district policies and procedures, a school cannot donate the money using a district credit card. To release funds collected for a specific charitable purpose, create a purchase requisition in IFAS, send the fundraiser authorization and ASB minutes and a check will be sent to the charity totaling the amount of the funds donated less any costs incurred to hold the fundraiser.

11. How do I determine if a charity is a legitimate organization?

Do your research. There is a variety of websites to assist you. CharityNavigator.org is one such website where you can learn about how to evaluate a charity's financial health and can download the most recent IRS form 990 submitted by the charity. You may also access the IRS website to confirm that the group is an actual 501(c) (3) public charity.

12. Can parents organize bake sales – during school hours or after school hours?

Administrative Procedure 3420 discourages the sharing of foods, which applies to bake sales. Therefore, it is strongly recommended that bake sales not occur during the school day. Essentially, we do not know where the products come from or what ingredients they contain. Some of our students suffer from food allergies that are potentially life threatening.

13. What about booster clubs?

Booster club fundraisers should be managed the same way that PTSA fundraisers are managed. Booster clubs are considered to be outside groups for fundraising purposes, whereas PTSAs and BSF are not. Booster clubs should have officially registered non-profit status. District employees may participate as private booster members; but to avoid conflicts of interest, they should not act in a leadership role or handle booster club funds. Students may participate voluntarily in booster club fundraising. However, for audit purposes, there must be evidence that booster club members, rather than students, perform the majority of the fundraising work when students are involved. Again, booster club fundraising should not be primarily dependent upon student participation.

14. What about a coin drive for an outside group?

A coin drive is fundraising and the same limitations about not allowing fundraising for outside groups at school must apply. Collecting pennies for an outside non-profit is no different from any other fundraising activity and all must be treated alike.³

15. Can we show movies in the gym with popcorn and pizza and charge \$?

NO. This violates the copyright law. Policy 2025 provides copyright guidance. It is not legal to rent or buy a movie and use for entertainment except in a private family home.

16. What about movie nights or events where we do not charge, where donations are only for food. Is there some other way to avoid the appearance that people are paying to watch the movie?

This would still be a copyright violation. Policy 2025 provides copyright guidance. This is because, except for showings in private homes, the only other exception that allows use of copyrighted videos/movies is as a legitimate part of face-to-face classroom instruction directly related to course objectives.

17. How have some PTSAs done this?

Some PTSAs have obtained limited licenses to show movies at school for movie nights, etc. Licenses can be obtained through sites such as <http://www.movlic.com/k12/index.html>.

18. What about raffles?

State ASB Regulations allow schools to conduct Bingo, raffles and carnivals but limitations apply. Raffles require a Washington State Gambling Commission license if tickets are going to be sold by anyone under 18 years of age. Washington law states raffle tickets may not be sold to individuals under 18 years old. For more information about raffles, contact the Washington State Gambling Commission: www.wsgc.wa.gov.

³ However, this form of fundraising, even for ASB activities, should be scrutinized because coin drives typically raise little money and can be burdensome to process. Still, the accounting department does have a coin-counting machine available if an ASB chooses to do this kind of activity.

19. I will not ask my students to fundraise for this great organization, but I would like to give them some pamphlets or websites that provide information about the charity. Can I do this? How about if we send the information out electronically?

Policy 6102 prohibits staff, parents, businesses, non-profits or anyone else to distribute information promoting private/non-district activities of any kind unless there is prior approval by the superintendent or a designee.

20. What about holding a car wash to raise money?

According to the City of Bellevue:

- If you are holding a car wash event for fundraising, make sure that the site has a drain hooked up to the sanitary sewer or check out a car wash kit from the city. Otherwise, the soapy, dirty water will flow down the nearest storm drain and eventually enter a stream. Some service stations in Bellevue have the city's car wash kit on site. Call Bellevue Utilities at 425-452-6166 for more information.
- Check with commercial car washes about fundraising. Some of them will let you sell tickets for car washes at their site and will share the proceeds. Most likely, you will be able to sell several tickets to each buyer, the fundraisers will not have to work all day, and you will know that rinse water will be recycled and later go to the sanitary sewer system.
http://www.ci.bellevue.wa.us/pdf/Utilities/Car_Care.pdf
 - As explained in item 7 above, if students are washing cars themselves, the money must be deposited in an ASB account. Care should be taken to identify the number of cars being washed so that a proper revenue reconciliation can be done. For example, have the car driver put his/her name on a list and initial beside the amount of money paid.

21. The graduating seniors have money left over that, they did not use for their activities. Can they give it to charity?

No, the seniors raised money to support the social activities of their class, so left over money cannot be given to a private organization. It also cannot be used for scholarships for individual students or any other private purpose. Often senior class officers ask if they can use their remaining funds to contract with a reunion committee for future use and/or place the money in a bank account to pay for reunion expenses; **this is not allowed either**. It is important to remember that the money belongs to the school, not to the graduating students or their class.

The funds CAN be transferred to other classes, used to purchase something non-curricular for the school (artwork, a sign, a bench, etc.), or given to the general ASB fund. If the graduating students want to designate the money for one of these purposes, they need to have it approved by the Student Council (ASB Officers) prior to the end of the school year. If the money is left in the class account after the students have graduated, it will fall to the following year's officers to decide how to use the funds.

School Auctions

22. Can we auction off parking spots at the schools or let the PTSA do that for an extended time?

School parking spots on school property are public property and **may not be auctioned off or used for fundraising purposes**. The District does not have authority to auction public property with limited exceptions (property officially declared surplus by the board is one exception). **Additionally, parking spaces cannot be auctioned off or otherwise used for fundraising purposes by outside groups (like PTA/ PTSAs)**. Further, RCW 28A.335.040 requires that fees for parking on school lots during regular business hours are used to offset the cost of maintenance or if the facility has outstanding debt, the fees must be deposited into the capital projects fund or debt service fund.

The District rents parking lots in some schools. A booster may not rent the parking spot and donate it to the booster club so the club can auction the parking spot for fundraising purposes. Groups may also NOT sell specific seats in the bleachers for sporting events, whether or not they are part of season passes to games.

23. Can we auction off private/small airplane rides, boat rides, and trips across the water in non-commercial vessels?

Our insurance will not provide coverage for any such activities because they are considered high-risk activities. Therefore, staff cannot offer these kinds of items, and schools may not support these activities. Employees may not participate as any part of their work in activities that are prohibited by our insurance limitations. We cannot approve water activities, except for transportation on commercial vessels (i.e., ferries).

24. Can our staff take students off campus on trips and adventures?

All school-sponsored trips require the approval of the principal. Any overnight, out of state, or international travel requires the approval of the school board. Administrative Procedure 2320P provides guidelines for schools.

25. What about auctioning wine, holding a wine tasting, or event with alcohol?

If a wine tasting or alcohol service is not on school property and students are not involved in the activity (except possibly as, for example, as an attendee at a dinner where wine is served) it would be allowed. The auction of wine is lawful in this state, subject to compliance with the Washington State Liquor Control Board permitting requirements, and the wine could not be stored, kept, or auctioned at a school site because alcoholic beverages are prohibited at sites used as schools.

26. What about projects or items made by students at school?

Students cannot use school time to create district-funded art or vocational projects or use district supplies to give to PTSA's for their auctions. If, however, the PTSA donated the materials and supplies AND if the use of student time to make something from those supplies would be consistent with appropriate class and curricular activity and an effective use of student time, then the students could give the finished products to the auction. However, principals should decide whether a particular activity is an appropriate use of student or school time to support a PTSA auction.

27. What about auctioning off a sleepover at school in our multi-purpose room?

Our schools do not have the kind of occupancy or hotel-type permits that would allow overnight sleepover use of our schools, but if there are specific activities planned for students to engage in all night and if there is sufficient supervision, it may be possible to allow an all-night activity.

Note: As with any fundraiser, all District policies and guidelines must be followed for good internal control and proper documentation (e.g., proper cash handling, sales/inventory reconciliations, etc.).