“Do it right first; don’t ask for forgiveness later.”
Module I
September 25, 2014

Food for thought...
appropriate food purchases.
Governing Policies

Certain transactions are scrutinized more closely because their propriety is difficult to determine.

Food purchases including meals and snacks all fall under the Sensitive Expenses policy...and these other related policies.

- Tests of Propriety
- Sensitive Expenses
- Official Functions
- Alcohol Authorization
- Recognition and Training
- Donations
- Fiscal Roles & Responsibilities
Tests of Propriety

- Official university business
- Best interests of university
- Most effective way to accomplish
- Compliant with laws, policies, restrictions
- Approved by appropriate level
- Within available resources
- Directly beneficial to department
- Reasonable
- Conflict of interest compliant
Sensitive Expenses

- Food
- Alcohol
- Flowers
- Gifts
- Parking
- Recognition
Official Functions

- Training: not recurring
- Community relations / goodwill: external
- Employee recognition events: annual
- Retirement
- Multi-unit = under different officer/dean
- Recruitment
- Student functions: not just students present
Alcohol

- Funding

- Unlicensed venue – Private:
  - personal invitation
  - guests identifiable
  - no separate charge

- Bad ideas:
  - Within work hours
  - Students: Serve-yourself or recruitment

- Private home: homeowner bears risk
Recognition

- Gift cards – one-time expedited approval
- Recognition reporting form: employee / not
- HR program – Kaylene McCrum
- Staff appreciation meals: annual
Donations / Sponsorships

- Nonprofit organization
- Mission: education, research, patient care
- Memo of rationale to dean for approval
- Minimal amount necessary
- Fewest attendees necessary
In The News...Actuals for FY 2014

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<tr>
<th>Object Code-Descr</th>
<th>Amount</th>
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<tr>
<td>480109 - BOTTLED WATER</td>
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<td>522602 - FOOD SERVICES</td>
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<td>552499 - ID OFFICIAL FUNCTIONS</td>
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<td>552625 - STUDENT ACTIVITIES</td>
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Total: $4,429,256.420000001
Clear Business Purpose

- There must be a clear benefit to the University.
- Outside of normal, daily job functions.
- Typically, an infrequent occurrence.
- Scheduling a meeting during lunchtime does not automatically qualify.
- “We’ve always done it” is not a good reason.
Questionable & Unallowable Purposes

- Improper coding: “international fee”, awards in “food supplies”
- Lunch meetings between employees, business collaboration
- Prizes in addition to the meal itself
- Breakfast, lunch or dinner for monthly faculty/staff meetings
- Lab meetings, book club
- Monthly appreciation events
- Multiple events/outings for the same reason or same group
- Break room tea & coffee – *Dept Chair or Dean levels only*
- Team Building, Social Events
- Travel: Group meals, official functions, multiple employees
Frequency of Occurrence

Lab/Staff/Faculty Meetings, Recurring Board, Normal Job Functions, Daily operations, *Performance Evaluations*

Guest Speakers, Faculty Recruitment, Student Recruitment, Grand Rounds, Training

Retreats, New Faculty Reception, Conferences, Retirements, Donor Cultivation, Fundraising, Staff Appreciation

* Conducting personnel reviews over lunch or dinner are not considered official functions.
Pointers

- Can you accomplish without the meal?
- Goodwill is for outside the University.
- Training requires formal agenda, professional development, designated speaker, attendee list (relationship) and quantifiable outcomes.
- Public perception.
- Appreciation >$5k to signed by both University and UPI (under review).
- Rarely should we pay the costs for spouses/family.
Questions?
Upcoming Modules

Module II – Mission Control

October 23, 2014 12:00-1:30 pm

Doors open at 11:45 am for set-up. Program begins promptly at noon.
Research 1 North, Hensel Phelps West Auditorium (P18-1006)

Presenters from Internal Audit:
• Corky Volkert, Audit Manager
• Brett Kellum, Audit Senior
• Kathleen Archuleta, Audit Manager-Compliance

Please refer to the Calendar on our Administrative Toolbox web page for dates, modules and to register:

http://www.ucdenver.edu/academics/colleges/medicalschool/administration/admin_offices/DFA/Pages/Calendar.aspx