

CAL POLY POMONA

SUBJECT: Hospitality Expenditure Procedure**

TOPIC: Grid of Allowable/Unallowable Expenditures

Effective: 9/3/2022

Revision No.: 1

Revised: 9/3/2022


Hospitality Activity	STATE	FOUNDATION			PHILANTHROPIC	ASI			Differences between State and Auxiliary - (ICSUAM 1301.00)
	CSU Funds within State Fund 948	[Strict Column] Grants & Contracts	Program Funds See Footnote 1	Public Relations Footnote 3	Cal Poly Philanthropic Foundation	ASI & IRA	Agency & Donation	F&O Union	
Personal Expenditures are always unallowable	Unallowable	Unallowable	Unallowable	Unallowable	Unallowable	Unallowable	Unallowable	Unallowable	
1 Employee's local meals when University business related with visitors, guests, students (non-employee), alumni, donors, etc. when there is no personal benefit derived by the host and the benefit to the university is greater than the cost of hospitality.	Allowable*	See G&C Manual	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	
2 Employee's local meals when University business related with job candidates and hiring employee (hiring manager, team, etc.) to obtain an acceptance offer.	Allowable*	See G&C Manual	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	
3 Employee's local meals when University business related with advisory committees, industry committees, search committees, etc.	Allowable Footnote 1	See G&C Manual	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	
4 Employee's local meals when University business related with college/department retreats, seminars, colloquiums, working/planning/staff meetings,	Allowable * Footnote 1	See G&C Manual	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable working/planning/staff meetings/seminars only	Allowable	Allowable working/planning/staff meetings/seminars only	
5 Employee's (faculty and staff) local meals when University business related with speakers, lecturers, etc.	Allowable * Footnote 2	See G&C Manual	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	
6 Employee's local meals when University business related during university-wide staff development events.	Allowable*	See G&C Manual	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	
7 Employee's local meals for events that are celebratory in nature (retirement/going away parties, holiday parties, etc.)	Unallowable	Unallowable	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	Allowable per section ICSUAM 1301 section 602 ↓
8 Employee's local meals for events with no valid university business purpose.	Unallowable	Unallowable	Unallowable	Unallowable	Unallowable	Unallowable	Allowable	Unallowable	
9 Local meals for official University visitors, guests, job candidates, or students in excess of State Maximum Per-Person Rates.	Unallowable	Unallowable	Allowable	Allowable	Allowable	Allowable	Allowable	Allowable	
10 Hospitality provided while on travel status when the majority of attendees are on travel status and it is more cost effective to provide a meal.	Allowable*	See G&C Manual	Allowable	Allowable	Allowable	Allowable	Allowable	Allowable	
11 Business related entertainment among peers.	Unallowable	Unallowable	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	Allowable per section ICSUAM 1301 section 602 ↓
12 Business related entertainment for official guests of the University	Unallowable Footnote 3 Exception	Unallowable	Allowable	Allowable	Allowable	Allowable	Allowable	Allowable	

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13 Spouse's cost of hospitality for official guests of the University when University business related.	Allowable * Footnote 4	Unallowable	Allowable	Allowable	Allowable	Unallowable	Allowable	Unallowable	Allowable per section ICSUAM 1301 section 602 
14 Employee hospitality expenses when University business related for employee morale	Allowable * Footnote 1	Unallowable	Allowable Footnote 4	Allowable Footnote 4	Allowable	Allowable	Allowable	Allowable	
15 Alcoholic beverages	Unallowable	Unallowable	Allowable Footnote 4	Allowable Footnote 4	Allowable	Unallowable	Unallowable	Unallowable	
16 Coffee service for campus offices.	Unallowable	Unallowable	Allowable	Allowable	Allowable	Unallowable	Allowable	Unallowable	
17 Non-meal expenses of employees at official function where attendance is required including event tickets, regalia rental, tuxedo/gown, rental, etc....	Unallowable, regalia rental only (FN5)	Unallowable	Allowable	Allowable	Allowable	Unallowable	Allowable	Unallowable	
18 Non-meal expenses of official visitors at official functions including event tickets, regalia, etc.	Unallowable	Unallowable	Allowable	Allowable	Allowable	Unallowable	Allowable	Unallowable	
19 Noncash gifts, flowers, employee receptions, new recruits, retirements, illness, hospitalization, cards or funeral flowers	Unallowable	Unallowable	Allowable	Allowable	Allowable	Unallowable	Allowable	Allowable Flowers in connection with illness, hospitalization or funerals only	
20 Plaques, flowers and parties - others.	Plaques only, with justification	Unallowable	Allowable	Allowable	Allowable	Unallowable	Allowable	Unallowable	
21 Employee Recognition: Plaques, certificates of achievements, similar recognition events for Employees	Allowable, with justification	See G&C Manual	Allowable	Allowable	Allowable	Allowable	Allowable	Allowable	
22 Noncash gifts/awards to employees for recognition, morale purposes (i.e. teambuilding events), etc.: Gifts, prizes and awards of tangible personal property	Allowable, FN7 reportable on W2 as compensation	Unallowable	Allowable	Allowable	Allowable	Allowable	Allowable	Allowable	
23 Noncash gifts/awards to nonemployees business/public relations purposes: campus event tickets, plaques, certificates, gifts or cards.	Allowable, Promotional items or prizes under limit only (FN6)	Unallowable	Allowable	Allowable	Allowable	Allowable	Allowable	Allowable	
24 Decorative office supplies	Unallowable	Unallowable	Allowable	Allowable	Allowable	Allowable For events only	Allowable	Allowable For events only	Allowable per section ICSUAM 1301 section 602

Campus Footnotes

* Agenda, attendees list, and authorization form required.

FN 1) Allowable if the following conditions are met:

- a) The meal is an essential part of the event (i.e. the meeting is longer than 4 hours and participants are required to work through the meal period). Additionally, for meetings with employees from different work locations the meal is an essential part of the event if a speaker is scheduled during the meal period.
- b) Hospitality provided is infrequent in occurrence (12 times or less per calendar year per group or committee).

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FN 2) Allowable during an event if hospitality is provided to all attendees during the presentation (must be included in the agenda)

** if meal is provided before or after the event to only a select few individuals from the original event (the Presentation, etc.), the meal is considered a separate event and the event must have a clear business purpose. A statement stating why the meal is an integral part of the event and how it benefits the university must be provided on the Hospitality Justification Form.*

FN 3) Allowable only if it is a campus-wide event (i.e. CPP fest, Pizza with the President, etc.)

FN 4) Hospitality provided to the spouse, domestic partner or significant other of an employee may be permitted when it serves a University business purpose such as ceremonial functions, fundraising events, alumni gatherings and community events.

FN 5) Regalia: Only the rental cost associated with regalia are reimbursable; as the University considers the purchase of regalia to be a personal expense and cannot be reimbursed using state funds. The state considers the reimbursement of personal expenses to fall under the classification of gifts of state funds, which noted in ICSUAM 1301.00, is not an allowable expense for the University.

FN 6) **Promotional items:** Use of promotional items such as branded keychains, coffee mugs, calendar, or clothing as a participant incentive for an event is encouraged. As a rule, promotional items under \$15 may be purchased with State Funds and these items would not be taxable, as they are de minimis to the recipient. For conferences and large events, promotional items should be limited to a combined value of less than \$50 per attendee.

Non-employee awards and prizes (non-promotional items): Reasonable awards and prizes made on behalf of the University to non-employees and outside organizations are allowed when the prize benefits the University, supports a University business purpose and fulfills the mission of the University. The maximum allowable value for any award or prize is \$50 per event. Additionally, any non-employee that accrues \$600 or more of payments or other income must be reported to the IRS.

FN 7) Benefits provided to employees are taxable as wages unless the benefit is excluded by the Internal Revenue Code Section 132 (26 U.S. Code Sec. 132); including de minimis fringe benefits. De minimis fringe benefits refer to any property or service whose value is so small as to make accounting for it unreasonable or administratively impractical. However, the Internal Revenue Service (IRS) has ruled in a previous case (ILM 200108042) that items with a value exceeding \$100 could not be considered de minimis, even under unusual circumstances. This includes tangible goods in excess of \$100 in value. Additionally, the IRS has stated in Publication 15-B that certain benefits can never qualify as de minimis fringe benefits, including cash and cash equivalents, and should be included as taxable income to the employee. Prizes and awards may also be considered taxable income to the recipient. Gift cards and gift certificates are considered cash or cash equivalent items and are never excludable as a de minimis fringe benefit from an employee's wages.

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Cal Poly Foundation Footnotes

- (1) Allowable unless restricted by Foundation program agreement.
- (2) Please use the Travel Request Form with appropriate approvals
- (3) Restricted to purpose as designated by the President and or the Board of Directors.
- (4) Decisions for authorization to approve alcoholic beverages will be made by the President or designee and based upon the request submitted.

Alcohol should not be allowed when only Cal Poly Pomona employees are in attendance.

** The Foundation administers various funds including Foundation programs & public relations funds. These funds may be used for expenditures classified as public relations. Public relations include those functions which are intended to create and promote favorable support with the public, employees, donors and university community. Accordingly this Public Relations Grid adopts the CSU Auxiliary Organizations

Compliance Guide section 11.6.4 as well as the ICSUAM 1301.00 Hospitality, Payment, or Reimbursement of Expenses, section 501 Employee Meetings and Recognition Events and the University's maximum per-person rates for hospitality expense as reviewed annually by the University's Chief Financial Officer.