



GUIDANCE RELATED TO GIFTS AND GIVEAWAYS

The Office of General Counsel recognizes that issues related to gifts and giveaways can be tricky. Please reach out to our office or the Office of University Compliance if you have any questions.

Gifts

The University's [Conflict of Interest Statement](#), based on Ohio Ethics Laws, prohibits all faculty and staff from accepting anything of "substantial value" from anyone doing business with the University. "Substantial value" is not defined in the law, but a previous state administration placed a \$20 limit on any single gift, or the total value of all gifts received. Small items, such as pens or lapel pins, may be accepted. Food that is provided for meetings, or as a meal at a family-style restaurant, is also acceptable. However, lavish meals or expensive gifts of food or alcohol, or tickets to entertainment or sporting events, may not be accepted.

In addition, you should not take gifts of substantial value from potential vendors if you will be involved in the selection process for their products. That is because Ohio Ethics Laws and the Conflict of Interest Statement prohibit University employees from using their influence to obtain a gift. Although you may not have solicited the gift and would not be influenced by it, the Ethics Law prohibits accepting anything of value from anyone who does or seeks to do business with CSU.

Other situations that cause confusion include those in which a vendor or potential vendor offers to pay for travel or registration at a conference and where a vendor offers you employment or a consulting appointment. Before accepting such an offer, please contact the Office of General Counsel or Office of University Compliance for additional guidance.

Giveaways

Anytime University resources are used to pay for something that is given to, or used by, a private individual or organization, the University is giving that private individual or organization a "gift." In general, public funds may not be used to provide gifts to private individuals or organizations. However, there are some circumstances in which the public purpose of the gift outweighs the fact that a private individual or organization benefits from it. Paying the travel expenses for interviewees, providing lunch or snacks during a training session, and providing token gifts – such as pens and lapel pins – for participation in a University event are all situations where the public benefit may outweigh the private benefit. Providing an expensive gift to employees for taking part in an event that is related to their jobs is not appropriate. Some departments have purchased an iPad or similar expensive gift to raffle off at an event or in exchange for completing a survey. Whether this is acceptable will depend on the public purpose

of the event or survey and on the target audience. Providing a high value gift to employees is problematic when the employees could otherwise be required to participate in an event, such as training; on the other hand, providing an expensive gift in order to have students or the public participate in high-priority events may be acceptable. Each situation must be evaluated based on these factors; please contact the Office of General Counsel or the Office of University Compliance if you plan to give away an item of significant value.

Because student organization funds are public funds, this rule also applies to student organization giveaways. It does not apply to giveaways that are paid for by a private entity, so long as the private entity is not a vendor.