

**US Army Corps
of Engineers** ®
St Louis District

**Contribution and Donor Recognition Plan
for St. Louis District**

May 2013

Table of Contents

| | |
|---|----------|
| Introduction | 1 |
| Purpose | 1 |
| Authority | 1 |
| Authority to Accept Contributions..... | 1 |
| Acceptable Donors | 2 |
| Prohibited Donors..... | 2 |
| No Solicitation of Contributions..... | 2 |
| No Lobbying | 2 |
| Ethical Considerations..... | 2 |
| Designation | 2 |
| Review and Approval | 2 |
| Program Administration | 3 |
| General | 3 |
| Monetary Contributions | 3 |
| Non-Monetary Contributions..... | 4 |
| Contribution Boxes | 4 |
| Reporting..... | 4 |
| Potential Projects | 5 |
| Recognition of Contributions | 5 |
| Approvals | 6 |
| Appendix "A" Contributions Recording | 7 |
| Appendix "B" Flow Chart | 8 |

Introduction

The Corps Contribution Program permits the Corps to accept monetary, services, or material contributions from groups (including governmental entities, but excluding project sponsors) and individuals in connection with carrying out water resources projects for environmental protection and restoration or for recreation. Whether in the form of cash, materials, or services, contributions have the potential to result in the sharing of project operational costs and to enhance the ability of the project staff to better manage existing facilities in the public interest. In this respect, contributions (including accepting grants) have the potential to enable the resource management staff to fund some programs and/or projects that have, as a result of reprioritization, either been deferred or delayed due to reduced Operational and Management (O&M) funds. Contributions offered will be consistent with Project Master Plans or Operational Management Plans (OMP) and will be carefully screened and evaluated for their suitability. Projects or tasks that are not in consonance with the guidance and policy of the Corps Contributions Program will not be initiated.

Purpose

The Contribution Plan is a tool and mechanism used to receive funds, materials, or services from outside resources to complete tasks that are described in the Master Plan or OMP. Contributions can be utilized to accomplish tasks or projects for the protection, improvement, restoration, rehabilitation or interpretation of natural resources, environmental features, recreation areas and facilities or cultural resources at projects.

The essential purpose of this plan is to provide a formal document that describes in general terms the categories or types of work that have been identified in Project OMPs that are eligible to be accomplished under the authority of the Corps Contributions Program.

In conjunction with describing the general nature or categories of work to be accomplished, this plan will also address the following: general procedures and methods for receiving and accounting for monetary contributions; methods for providing recognition to contributors and acknowledge public support.

Authority

Authority to Accept Contributions: 33 USC § 2325 authorizes the Corps to accept contributions of “cash, funds, materials, and services” “in connection with carrying out a water resources project for environmental protection and restoration or a water resources project for recreation.” 33 USC § 2328 authorizes the Corps to accept contributions of “funds, materials, and services” “to share the cost of managing recreation facilities and natural resources at [Corps] water resource development projects.” Additionally, 33 USC 569c authorizes the acceptance of services of volunteers. The term “contribution” includes anything of value (funds, materials, supplies, or in-kind goods or services) received from an outside source without consideration or an exchange of value, but does not include construction.¹ Funds or other items received as a result of a competitively awarded grant from a foundation are also considered a “contribution”.

¹ If a non-Federal entity seeks to perform construction at a Corps water resources project, the authority for such construction is 16 U.S.C. § 460d. This distinction is important because the requirements for how USACE must process any funds that it receives from the use of a facility constructed under 16 U.S.C. § 460d are different from how USACE must process funds received through 33 U.S.C. § 2325 and § 2328.

Acceptable Donors: The Corps may accept contributions from individuals, organizations, foundations, governmental entities, corporations and businesses. Contributions may be accepted only for programs and activities contained in approved annual or five-year operation management plans (OMP). If a Federal grant is involved, a note or letter is needed stating the money is acceptable to use on Corps property.

Prohibited Donors: Contributions from a project sponsor (i.e. the party with whom the water resource project has been jointly created, a party to a project cooperation agreement (PCA) or project partnership agreement) may not be accepted. Real Estate cannot be accepted as a donation through Contributions. For information on whether a particular donation should be accepted or for further information on authorities and constraints, see Section 5.1, of the Contributions, Fund Raising, and Recognition Reference Guide or ER 1130-2-500, Chapter 11.

Contributions from an entity which holds or is seeking a concessions contract or which would identify the Corps with alcohol or tobacco products shall be declined.

No Solicitation of Contributions: Corps employees may not solicit or take any actions that gives the appearance that they are soliciting contributions in support of the Corps programs or activities. The term "solicit" means any request made to a non-federal entity, group or individual for contributions to be made directly or indirectly to the Corps. There are, however, appropriate activities that Corps employees may undertake in relation to authorized fundraising by partners. Corps employees can negotiate with partners in the context of a partnership agreement and partners can then fundraise to generate their contribution to the partnership.

No Lobbying: Employees shall not engage in lobbying activities

Ethical Considerations: Corps employees are subject to ethics regulations which prohibit federal employees from giving preferential treatment to any entity or individual. Employees may not use their official title, position or authority of their public office to endorse any product, service or enterprise.

Designation: The Chief, Operations, Technical and Policy Branch, shall serve or appoint staff to coordinate the District Contributions Program.

Review and Approval

Before receiving a contribution other than from a contribution box, the contribution must be evaluated as follows:

- A. For any donated valued at \$2,500 or more, the Operations Project Manager must perform a thorough internet search to determine whether publicly available information exists that raises concerns about the propriety of acceptance. A file shall be created that includes documentation of search findings.
- B. For contributions offered and valued at \$100,000 or above, coordination is required with the District Operations Contributions Coordinator before acceptance can be allowed. A written summary by the Operations Project Manager or their appointed Contributions Coordinator shall be submitted.

Program Administration (see Appendix A)

General: The Operations Project Manager shall serve or appoint a member of their staff to lead up a contribution effort ensuring procedures and policies are adhered to utilizing the "Contributions, Fundraising and Recognition Reference Guide", ER and EP 1130-2-500 Chapters 10 and 11. The District Office Contributions Coordinator will be contacted and input sought prior to accepting a contribution. A file is to be assembled per contribution that includes correspondence, name of contributor, type and description of contribution, amount of contribution, and any notes.

Monetary Contributions: Monetary contributions will be deposited into account 96x8862 of the U.S. Treasury according to the requirements outlined in ER 37-2-10, Chapter 4. They can be handled like a customer order with advance use. A work item is set up in P2 citing the appropriation the funds would be captured under when completing the advance account, allowing the District Resource Management Office (RMO) to fund the transaction in their database. The Project Budget Analyst will need to communicate with the District RMO, Budget (RM-B) to determine the correct appropriation intended for use to fund the work.

Work projects (general): Revenue collected from a contributor at a Project that is not designated by the contributor for a specific work project will be transferred to the District RMO for deposit into the U.S. Treasury and the proper account. Following confirmation of receipt and deposit of these funds into the U.S. Treasury, a specific CEFMS account (i.e. funded work item) will be established for contributions received at the Project. The Operations Project Manager or their designated representative will be responsible for coordinating the establishment of the CEFMS account with Resource Management, Finance (RM-F). Once deposited, these funds will become immediately available to the Project and will only be used for the general work activities listed in this plan.

Work projects (specific or earmarked contributions): The procedures for deposition of such monetary contributions are the same as for the general contributions, except that a separate CEFMS account (funded work item) will be established for such contributions. Contributions "earmarked" or designated for a specific work item or project will be administered separately from the general contributions account. All such project specific or "earmarked" contributions will only be accepted for implementing work and accomplishing projects that are consistent with the OMP and this plan.

Use of Contributions: Contributions may not be used for permanent employee salaries. Contributions may be made to fund salaries of term or temporary Corps employees. Contributions will not be used to begin construction or other projects or programs, unless there are sufficient appropriated and donated funds in hand to ensure completion of the work to a degree that has independent utility. Donated funds may, however, be used to advance project design work.

Process:

1. A copy of the agreement or explanation of arrangement will need to accompany submission.
2. Technical Office will request RM-F to create an advance account upon verification of funds to be received (either electronically or by check)
3. RM-B will establish the manual customer order
4. Upon approval/certification/acceptance by technical POC and RM respectively, funds will be available for use.
5. All contributions should be coordinated with the Operations, Management Support Branch (OD-M).

RMO contact staff regarding contributions:

- Resource Management Office, RM-F, Accountant POC (Sharon Ward)
- Resource Management Office, RM-B, Budget POC (Sheila Burnett)

Non-Monetary Contributions: Materials and supplies may be accepted. Coordination with Property/Supply staff in Logistics Management at the Project and/or District Office level shall occur to help determine if an item(s) needs to be identified as capital and inventoried. Value and items received will need to be reported in OMBIL in the REC-Annual Update, Partnerships Update.

Contribution Boxes: A contribution or donation box may be set up at field offices, visitor centers and other appropriate locations. The installation of a contribution box is optional and at the manager's discretion. Another option would be to have a contribution box for your cooperating association and that eliminates the USACE processing requirements for donated funds. The contribution box should be locked and have a sign stating the use of the contributions. It should be clear to the visitor that any money collected is a voluntary contribution and is not required for touring the visitor center, receiving brochures or pamphlets or any other services.

Cooperating Association donation boxes suggested text could state "Voluntary donations are used by the (*insert cooperating associations name*), a non-profit cooperating association that partners with the US Army Corps of Engineers' to support various outreach and educational efforts at (*insert project name*)."

Funds for USACE from contribution boxes must be accounted for in the same manner as any other donation by following these steps:

1. Create debtor/sponsor in CEFMS (CEFMS Data Manager)
2. Set up advance account and cost share
3. Work item from P2 for each AMSCO Project Code
4. Collections to advance account (Authorized Recreation Fee Collector)
5. Confirm deposit (UFC)
6. Email to Budget staff who creates register and fund account for cost share work item
7. Money available to expend

Any activity or task under \$25,000 can be completed using the work item associated with the Contribution box.

Accepting Direct or Large Donations: A patron or organization may want to donate to a park but not want to put a check or large amount of cash in the Contribution box. In this case, the Authorized Recreation Fee Collector may receive these funds at their office. A receipt must be given and the Collector must make it clear to the patron that receiving this Contribution is in lieu of placing it in the Contribution box. A standard receipt book is appropriate to use for this purpose. A note should be written stating the purpose of the Contribution.

Reporting: Each project office that receives contributions must submit an annual report of the total amount of contributions via the Operations and Maintenance Business Information Link (OMBIL). See Appendix B for a sample contribution tracking sheet.

Deposits, Form, Reports: Engineering Report 3313 (remittance register) should be used to report monthly contributions when they exceed \$1,000. If \$1,000 or more, a deposit is required. A weekly deposit is recommended if funds begin to come in on a regular basis. A monthly report will be maintained at the District Office and be coordinated through District staff in RM.

Asset Work Item: For projects valued over \$25,000 (labor and equipment included), Project budget staff needs to be informed this is an asset work item. This new item will be considered an "asset" and must have a separate work item to complete the task.

Potential Projects

General: Contributions will be utilized to accomplish tasks or projects for the protection, improvement, restoration, rehabilitation or interpretation of natural resources, environmental features, recreation areas and facilities or cultural resources at the Project.

Work Categories: The following list, while not comprehensive, provides some generalizations of the general types of projects that are typically identified in a Project OMP.

Typical Tasks Identified in Project OMPs & Acceptable for Contributions

| General Category | Specific Work Examples |
|--|---|
| Enhancement of lake aesthetics and recreation facilities | Vegetation plantings in recreation areas Removal of invasive species Repairs/upgrades to facilities Drift and debris removal Signs and marker installation Accessibility improvements |
| Interpretive and Water Safety Programs | Outreach/promotional supplies and materials Interpretive signage and exhibits Website and Social Media page development Life jackets and other safety equipment Public Affairs/Tourism/Marketing Special programs and events |
| Environmental Stewardship | Forest management Wildlife management Level 1 and 2 inventories Habitat studies Trail development Develop/enhance GIS database |

Recognition of Contributions

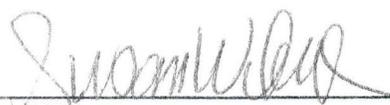
St. Louis District shall at a minimum acknowledge all direct contributions in writing through a letter of acceptance which will note the amount of cash donation, or description of materials or services provided. This may serve as a record the donor can use to verify their contribution. The letter should not attempt to value non-cash contributions. News releases coordinated through the district Public Affairs Office to print, web, radio, and television media may be used to recognize donors through unpaid media. A plaque or other appropriate sign may be purchased and placed on the project site to recognize the donation. A donor board or wall located and integrated into the project office, visitor center, or other appropriate visitor facility may be used to recognize the donation.

Approvals



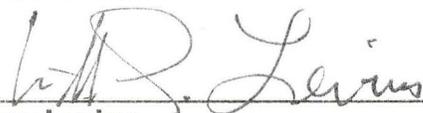
Jon Schulte
Natural Resources Specialist
St. Louis District

5/6/13
Date



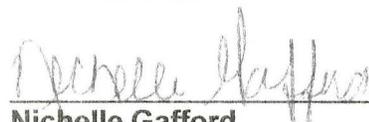
Susan Wilson
Chief, Operations Technical and Policy
Branch
St. Louis District

5/6/13
Date



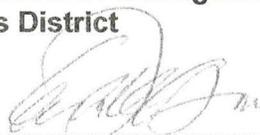
William Levins
Chief, Office of Counsel
St. Louis District

5/6/13
Date



Nichelle Gafford
Chief, Resource Management
St. Louis District

5/17/13
Date



Lou DellOrco
Chief, Operation and Regulatory Division
St. Louis District

5/17/13
Date

Appendix A
(Provided by Portland District)

Accepting Contributions - Flow Chart

