HERKIMER COUNTY COMMUNITY COLLEGE
BOARD POLICY

TITLE: Provision of Meals and Refreshments at College Meetings and Events

POLICY #: FA 25-26

DATE OF BOARD OF TRUSTEES APPROVAL:

RESOLUTION #: 25-26

POLICY STATEMENT: The College recognizes that meals and refreshments may occasionally be necessary to support student engagement, recruitment, workforce development, fundraising, official events, and other institutional priorities. Because College resources are derived from public funds, tuition revenue, grants and donor support, expenditures for meals and refreshments must be limited, justified, documented, cost-effective, and directly connected to a legitimate institutional purpose. The College expects all employees to exercise prudent stewardship and ensure such expenditures would withstand public and audit scrutiny.

In addition, all expenditures must comply with SUNY regulations, New York State guidelines, and IRS rules governing taxable benefits.

I. PURPOSE

This policy establishes guidelines governing the provision of meals and/or refreshments at meetings, events, and official functions of the College. It ensures responsible stewardship of public funds, prevents waste and abuse, and maintains compliance with applicable Internal Revenue Service (IRS) regulations regarding taxable income.

II. SCOPE

This policy applies to all College departments, offices, affiliates and employees utilizing College-administered funds, including unrestricted funds as well as grants.

This policy applies to meals and refreshments provided for College meetings, events, and official functions. Employee meals incurred while in approved travel status are governed by the College's Travel Policy.

All purchases remain subject to the College's Purchasing Policy, including requirements for advance approval, purchasing documentation, purchase orders, credit card use, and reimbursement procedures.

III. GENERAL GUIDELINES

1. **Business Purpose Requirement**
   Meals or refreshments may only be provided when there is a clear and documented business purpose. Convenience or customary practice alone is not sufficient justification. Food expenditures should primarily support student success, enrollment management, workforce development, community engagement, fundraising, recruitment, retention, and official College business.

   Acceptable purposes may include:
   - Meetings extending beyond normal meal periods where attendance is required
   - Recruitment activities for students or employees
   - Official College events, ceremonies, or conferences
   - Functions involving external stakeholders

2. **Reasonableness and Cost Control**
   - Costs must be reasonable and reflect prudent use of public funds. Per meal and/or per diem limits are included in the College's Faculty/Staff Handbook annually.
   - Departments must select cost-effective options and avoid excessive or luxury expenditures
   - Alcoholic beverages are prohibited when College unrestricted and/or restricted fund grants funding is used
   - The per-person cost must be reasonable based on the nature of the event, number of attendees and available budget. The Purchasing Office may request additional justification for costs that appear excessive, inconsistent with the event purpose, or disproportionate to expected attendance.

3. **Frequency and Necessity**
   - Routine staff meetings should not include meals or refreshments
   - Repeated or frequent expenditures for the same group require additional justification and supervisory approval
   - Meals or refreshments for standing committee meetings, department meetings, or regular staff meetings are generally not allowable unless a specific exception is approved in advance and a substantial institutional business purpose is documented.

IV. PREVENTION OF WASTE AND ABUSE

All expenditures must align with the principles of accountability, transparency, and fiduciary responsibility. The college must ensure expenditures would withstand public scrutiny and external audit.

1. **Advance Approval**
   - Purchase requisitions for all meals or refreshments must be submitted a minimum of five business days before the event unless extraordinary circumstances exist. Any and all food purchases must be approved by the relevant cabinet member and any purchase exceeding $250 requires presidential approval. Employees approving expenditures should consider whether the expense would withstand public scrutiny

and be viewed by taxpayers, auditors, donors, student, and community members as a prudent use of institutional resources.

2. **Attendance Verification**
   - Departments must maintain records of attendees and quantities ordered to prevent over-purchasing. Significant discrepancies may be reviewed by the Purchasing Office when evaluating future requests.
   - For large public events where individual names are not practical to obtain, departments must provide an estimated attendance count, description of the attendee group, and explanation of how the quantity ordered was determined.

3. **Order Quantity**
   - Orders must reasonably reflect expected attendance
   - Departments demonstrating repeated patterns of over-ordering, excessive leftovers, poor attendance relative to projected attendance, or non-compliance with documentation requirements may have future requests denied or require additional levels of approval.

4. **Prohibited Uses**
   College funds may not be used for:
   - Personal meals not associated with an official function
   - Celebrations of a primarily personal nature
   - Expenses lacking a documented business purpose

5. **Audit and Oversight**
   - All expenditures are subject to audit
   - Violations may result in repayment obligations and/or disciplinary action

V. IRS COMPLIANCE (TAXABLE INCOME)

The College must comply with IRS regulations concerning employer-provided meals:

1. **De Minimis Fringe Benefits**
   Meals or refreshments may be excluded from taxable income if they are:
   - Occasional and infrequent
   - Of low value
   - Provided for administrative convenience (e.g., working meetings)

2. **Taxable Benefits**
   Meals may be considered taxable income to employees if:
   - They are provided regularly or routinely
   - They are not directly related to a substantial business purpose
   - They exceed de minimis thresholds

3. **Reporting Requirements**

- Departments must accurately document the purpose, attendees, and frequency of provided meals
- The College reserves the right to report the value of meals as taxable income when required

4. **Employee Responsibility**
   Employees are responsible for understanding that certain benefits may be taxable and may appear on their W-2 forms.

VI. FUNDING SOURCE RESTRICTIONS

- Expenditures must be evaluated for allowability based on the funding source. Foundation funds, grant funds, auxiliary funds and College operating funds remain subject to this policy unless the funding source contains more restrictive requirements.

VII. DOCUMENTATION REQUIREMENTS

All requests and reimbursements must include:

- Description of the event or meeting
- Business purpose justification
- Date, time, and location
- Agenda, program, flyer, invitation or other supporting documentation, when applicable.
- List of attendees (or estimated attendance for large events)

Incomplete documentation may result in denial of payment.