



UNITED STATES MARINE CORPS  
MARINE CORPS UNIVERSITY  
EDUCATION COMMAND  
2076 SOUTH STREET  
QUANTICO, VA 22134

IN REPLY REFER TO:  
4001  
CG

MARINE CORPS UNIVERSITY POLICY LETTER 1-18

JUN 27 2018

From: President, Marine Corps University  
To: All Hands

Subj: GIFT ACCEPTANCE AND VOLUNTEER SERVICES

- Ref: (a) SECNAVINST 4001.2K - Acceptance of Gifts, 7 May 2018  
(b) SECNAVINST 1650.1H - Awards Manual, 22 Aug 06  
(c) MCO P5800.16A - LEGADMINMAN, Ch. 7, 10 Feb 14  
(d) DOD 5500.7-R - Joint Ethics Regulation, 17 Nov 11  
(e) 10 USC § 2601 - General Gift Funds  
(f) 31 USC § 1353 - Acceptance of Travel and Related Expenses from Non-Federal Sources  
(g) OPNAVINST 5380.1D - Voluntary Services, 11 Aug 16  
(h) DOD 7000.14-R, Volume 12, Chapter 30 - DOD FMR, June 2009  
(i) NAVSO P-1000 - Fiscal Management Policy Manual, 12 Dec 02  
(j) Joint Travel Regulations, 1 May 2018  
(k) 41 CFR, Chapter 304 - Payment of Travel Expenses from a Non-Federal Source, 1 Jul 12  
(l) 10 USC § 1588 - Authority to Accept Certain Voluntary Services  
(m) DODI 1100.21 - Voluntary Services in the DOD, 26 Dec 02  
(n) TECOM Policy Letter 01-08 - Guidance on Relationships with Non-Federal Entities and Gift Acceptance, 5 Dec 08  
(o) DODI 5400.11-R - DOD Privacy Program, 14 May 2007  
(p) SECNAVINST 5211.5E - DON Privacy Program, 28 Dec 05  
(q) MOU between MCU and MCUF, 11 Oct 11  
(r) OPNAVINST 5750.13A - Historical Property of the Navy, 8 Jun 12  
(s) DODI 4140.1R - Supply Chain Materiel Management, 23 May 2003  
(t) 31 USC § 1517 - Prohibited Obligations and Expenses  
(u) 5 CFR 3601.104

- Encl: (1) Gift Acceptance Procedures  
(2) Voluntary Services Procedures

1. Cancellation. Marine Corps University (MCU) Gift Acceptance and Volunteer Services Policy Letter 4-17, dated 29 Sep 17.

2. Situation. MCU and its subordinate elements receive numerous offers of gifts throughout the year. Gifts offered to MCU benefit its operation and enhance the ability of MCU to execute its mission. The primary, but not exclusive, donors of such gifts are the Marine Corps University Foundation (MCUF), the Marine Corps Heritage Foundation (MCHF), and the Marine Corps

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Association Foundation (MCAF). The appropriate Department of the Navy (DON) acceptance authority may accept gifts that satisfy the criteria of reference (a).

a. Definitions. The term "gift," unless otherwise qualified, means a gift, device, or bequest of real or personal property without consideration. Although the term "gift" does not generally include services, services may be accepted as a gift as authorized by references (a) through (k). Additionally, volunteer services from individuals may be accepted to support museum and education programs as authorized by references (l) and (m).

b. Background. Reference (n) is the Commanding General (CG), Training and Education Command (TECOM) Policy Letter on Gift Acceptance. It implements the references, establishes specific guidance on gift acceptance, and outlines procedures to process gifts and services offered to TECOM and its subordinate elements.

3. Mission. Effective immediately, MCU will accept and process gifts and volunteer services in accordance with (IAW) applicable laws and regulations in order to prevent fraud, waste, and abuse and maintain the high ethical standard expected of those in positions of trust.

4. Execution

a. Commander's Intent

(1) Purpose. To ensure those personnel entrusted with gift and volunteer services acceptance uphold prescribed ethical standards.

(2) Method. We will accept and process gifts and volunteer services in a manner above ethical reproach. We will play the ethical midfield at all times. In addition to legal review, we will ensure acceptance of a gift will not create embarrassment to the Marine Corps or create the appearance of a relationship in which favors are granted.

(3) Endstate. All hands have a clear understanding of what is ethically allowed and there are zero violations of applicable laws and regulations.

b. Concept of Operations. This policy establishes specific responsibilities to process, accept/decline, publish, and record gifts to MCU and volunteer services for education and museum programs. The Vice President of Business Affairs (VPBA) will oversee the Gift Acceptance Program at MCU, to include the National Museum of the Marine Corps (NMMC). VPBA will ensure that all gifts are appropriately processed, accepted, documented, and recorded by category per enclosure (1). VPBA will also ensure that all volunteer services are appropriately accepted, used, and documented per enclosure (2) in compliance with the privacy requirements outlined in references (o) and (p).

c. Tasks

(1) Chief of Staff/Executive Vice President. Serve as the designated MCU Liaison to MCHF.

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(2) Vice President, Academic Affairs. Serve as the designated MCU liaison to MCUF

(3) Vice President of Education Integration, Operations, and Plans. Serve as the designated MCU Liaison to MCAF.

(4) VPBA

(a) Supervise the execution of the MCU Gift Acceptance and Volunteer Services Programs.

(b) Enforce gift acceptance procedures and report gift acceptance activities per enclosure (1) and the references.

(c) Enforce voluntary services procedures per enclosure (2) and the references.

(d) Ensure the relationship between MCU and MCUF is IAW reference (q).

(e) Maintain all records associated with this policy.

(f) Ensure that the Quantico Area Counsel Office (QACO) is provided copies of all gift acceptance packages.

(5) Director, History Division/Gray Research Center. Review and process offers of gifts of intellectual property IAW enclosure (1).

(6) Director, NMMC. Report gifts accepted within your authority, per enclosure (1), to President, MCU via VPBA on a quarterly basis.

(7) Director, Facilities & Logistics. Maintain a property account record for all gifts of more than minimal value (i.e., more than \$305.00) accepted by President, MCU

##### 5. Administration and Logistics

a. MCU Financial Management Office is the Office of Primary Responsibility for administering the Gift Acceptance Program on behalf of VPBA. The Gift Acceptance Program Manager (GAPM) is the first point of contact for all questions or concerns regarding the Gift Acceptance Program.

b. All gift offers from commercial enterprises (non-foundation gift offers) will be referred to VPBA via the Financial Management Office.

c. The Civilian Personnel Office maintains all records associated with volunteer services.

d. The Director, NMMC maintains records for gifts of personal property under the Director's acceptance authority.

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e. Subsequent modifications to the Gift Acceptance and Volunteer Services procedures in enclosures (1) and (2) will be initiated by the GAPM through the Director, Financial Management.

(1) Approval authority for changes is delegated to VPBA.

(2) VPBA has discretion on whether changes require a legal review from QACO.

6. Command and Signal

a. Command. This policy is applicable to all service members (active and reserve) and civilian personnel, assigned or attached to MCU.

b. Signal. This policy is effective the date signed until superseded or cancelled by authority of President, MCU.

  
W. J. BOWERS

Copy to:  
Executive Steering Committee  
MCU Subordinate Units  
MCHF  
MCUF  
MCAF  
QACO  
TECOM G-8

## **GIFT ACCEPTANCE PROCEDURES**

1. Gift Acceptance Guidance. The guidance and procedures below will ensure that all gifts meet the criteria per reference (a) prior to acceptance by Marine Corps University (MCU) of any offer from any non-federal entity.

a. Authority. The authority to accept or reject a gift offered to the Department of the Navy (DON) rests with the Secretary of the Navy and his designees within their delegated authorities. Within MCU, only the President and the Director, National Museum of the Marine Corps (NMMC) have been delegated acceptance authority for gifts of personal property within the limits of their delegations. The Vice President of Business Affairs (VPBA) has been delegated authority to accept gifts of travel. Prior to acceptance, any offer of a gift to MCU, to include gifts to the NMMC, will be reviewed by the Quantico Area Counsel Office (QACO) to ensure that those gifts meet the applicable acceptance criteria. Electronic copies of all gift acceptance packages will be maintained by MCU and QACO.

b. Solicitation of Gifts. Solicitation of gifts by military and civilian faculty, staff, employees, and students in violation of applicable laws and regulations is prohibited.

(1) MCU personnel will not request, or otherwise influence any non-federal entity, to include the Marine Corps Heritage Foundation (MCHF), the Marine Corps University Foundation (MCUF), and the Marine Corps Association Foundation (MCAF), and to provide any gift to any MCU activity.

(2) Any gift offered as a result of such solicitation shall be declined by the acceptance authority. Only the designated MCU liaisons to MCHF, MCUF, and MCAF will discuss program priorities and enhancements with representatives of those entities.

(3) Per reference (a), Commandant, Marine Corps (CMC), or his designee, may solicit appropriate gifts for the use and benefit of military museum programs pursuant to subsection (a) (2) (B) of reference (e).

## 2. Gift Acceptance Procedures

a. Gifts from Foundations and Similar Entities. While foundations and other non-profit organizations may provide valuable support to the MCU, they should not be used as conduits to make indirect gifts that MCU gift acceptance policies would not permit if offered directly to the MCU.

### b. Identification of Enhancement Opportunities and Priorities

(1) Prior to communicating identified enhancement opportunities to other foundations or similar organizations, MCHF will be granted the right of first refusal for enhancement opportunities benefitting the NMMC and/or the Marine Corps History Division (HD). MCUF will be granted the right of first refusal for all other identified enhancement opportunities.



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(2) In the third quarter of the calendar year (CY), or as requested in coordination with (ICW) the foundations, the Gift Acceptance Program Manager (GAPM) issues a data call to all MCU subordinate schools, units, and sections for the identification of enhancement opportunities and priorities that support the MCU mission. These enhancement opportunities are categorized by various types of support as outlined below:

(a) Academic Chairs. Academic Chairs and Endowed Chairs may or may not receive stipends or salaries from a donor.

(b) Battlefield Studies. Battlefield Studies includes funding for transportation, lodging, docent fees, entry fees, and instructional material such as battlefield guides, historical overviews, and audiovisual products.

(c) Conferences/Symposia. This includes support for travel, honoraria, gifts for speakers and guests, meals, and printing of programs associated with MCU-sponsored conferences and symposia.

(d) Faculty Development/Student Research. This includes conference and seminar fees, audiovisual materials, and other reference material that relates to the current approved curriculum.

(e) School Development. This includes support for distinguished guests, gifts, and gift exchange items for visiting dignitaries.

(f) Visiting Speakers. This includes support for distinguished military professionals and subject matter experts (SME) who share their knowledge and experiences in lectures.

(g) Research Assistants. Research assistants conduct graduate-level research on topics pertinent to the curricula of the three degree programs; currently, Marine Corps War College, the School of Advanced Warfighting, and Command and Staff College. Research assistants may conduct research to support publication of faculty books, book chapters, articles, and scholarly products, to include presentation of papers at professional educational conferences and symposia.

(h) Intern Program. Interns may be undergraduate or graduate students in good academic standing at an accredited college or university. The program is designed to enhance and support the Gray Research Center (GRC), HD, and NMMC. Interns will be supervised by appropriate personnel to ensure appropriate level of work from the intern and their work benefits MCU.

(i) Campaign for Books. The Campaign for Books program is designed to assist faculty and GRC in locating particular books in support of curricula needs of MCU, the faculty, and upon occasion, in direct support of patron needs or requests.

(j) Archives, Preservation, International Flags, and Special Projects (Collections). Preservation funds the acquisition of archival items and collections that enhance and enrich the

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overall holding of the Archives. International flag purchases allow for the appropriate recognition of our foreign allies and their students attending the University during a particular academic year.

(k) History and Heritage Academic Enhancements. Academic enhancements consist of doctoral dissertations, master's theses, research grants, teacher in residence programs, and other educational support for the NMMC and HD. NMMC enhancements consist of collections/exhibitions support, external outreach support (communication with external stakeholders), education support, combat art collection support, and visitor service support.

(3) The GAPM collates the responses and sends them to QACO for a preliminary legal review.

(4) The GAPM presents the reviewed enhancement opportunities to the Executive Steering Committee (ESC) in the form of an annual plan. The ESC reviews for accuracy and validity, ultimately producing a by-section prioritized list of enhancement opportunities presented to the President, MCU for his/her review and approval.

(5) After President, MCU approval, the proposed enhancement opportunity plan for the CY is sent to the foundations' Chief Executive Officers via the MCU foundation liaison officers. The liaison officers are authorized, within the scope of their authority (per their appointment letters), to discuss the University's priorities on a routine and continual basis. The designated liaison may ask other SMEs from MCU to participate in these discussions.

(6) The foundations review the submissions and send President, MCU a letter outlining their planned support for the upcoming CY.

c. In-Year Execution of Gifts. Gifts from non-federal sources falling into various categories per paragraph (2) (b) (2) are processed according to the following types: real property, intellectual property, personal property, money, travel, and gratuitous services.

(1) Gifts of Real Property. Real property includes land and any buildings, improvements, or fixtures on that land. Offers of gifts of real property in excess of \$2,000,000 will be forwarded to the Department of the Navy/Assistant for Administration (DON/AA) for acceptance by Under Secretary of the Navy (UNSECNAV). Offers of gifts of real property valued at \$2,000,000 require acceptance by the Assistant Secretary of the Navy (Energy, Installations and Environment). MCU will immediately notify QACO of any offers of real property, or improvements to real property in order to facilitate gift processing and notification of the Naval Facilities Engineering Command and Commander, Naval Installations Command.

(2) Gifts of Intellectual Property. Intellectual property includes any patent, trademark, copyright, or other intangible property interest of a similar nature. Offers of gifts of intellectual property will be referred to Director, HD/GRC, who will make a recommendation as to whether or not the offer should be accepted prior to forwarding to the appropriate acceptance authority. Ownership of intellectual property rights for potential donations must be considered when the

## GIFT ACCEPTANCE PROCEDURES

potential donor is offering materials they have created or for which they otherwise own the intellectual property rights. If the potential donor agrees that the intellectual property rights to a donation made are included in the donation, they must set a value on those rights. QACO Intellectual Property Rights Attorney will be consulted prior to routing potential gifts of intellectual property to the appropriate acceptance authority.

(3) Gifts of Personal Property. Personal property includes all property not defined as real or intellectual property, excluding gifts of money. When MCU is offered a gift, the recipient shall acknowledge the offer and advise the prospective donor that the offer has been forwarded to the appropriate acceptance authority.

(a) Tangible Property. If tangible property of any kind other than money is received, the recipient or receiving Activity shall temporarily assume custody of the property. However, the property shall not be taken up on the MCU property account record until after final acceptance by the appropriate acceptance authority.

(b) MCU Acceptance Authority Threshold. President, MCU may accept gifts of personal property of a value not exceeding \$200,000. This includes consumables or perishable products such as coins or food, non-alcoholic beverages, flowers, candy, coffee, etc., intended for command personnel to consume at a specific event.

(c) Conveyance or Transfer of a Gift. President, MCU may pay all expenses in connection with the conveyance or transfer of an accepted gift with appropriations chargeable with such costs.

(d) NMMC Acceptance Authority Threshold. Per reference (e), Director, NMMC has acceptance authority for gifts of personal property of historical significance or artistic work of museum quality up to \$10,000 in value.

1. Gifts to the NMMC. Accessioned artifacts, including those gifted to NMMC, are documented by a standard Deed of Gift, the legal document that transfers ownership to the Marine Corps. Such gifts are of considerable historical significance, whose financial value is undetermined unless the donor provides an appraisal. NMMC staff may not provide appraisals for any reason but may estimate a fair market value for internal purposes based on subject matter expertise. If NMMC staff believes the value of an artifact may exceed \$10,000, Director, NMMC will refer such a gift of personal property for approval via President, MCU up to the appropriate acceptance authority. No specific dollar value estimate will be provided for gifts not believed to exceed a value of \$10,000 by NMMC staff.

2. NMMC Acceptance Procedure. Gifts accepted by Director, NMMC will be processed via MCU Financial Management Office (FMO) and in accordance with (IAW) paragraph (1) (a) of this enclosure. The NMMC Registrar, via the Director, will maintain records and report acceptance of such gifts to President, MCU, via VPBA, on a quarterly basis IAW references (r) and (s).



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3. Reporting Gifts to the NMMC. MCU FMO will comply with the quarterly reporting requirement to the Defense Finance and Accounting Service (DFAS) via Headquarters Marine Corps (HQMC) Judge Advocate Research and Assistant for Administration to the Under Secretary of the Navy (AAUSN). The Deed of Gift declares that the donor “irrevocably and unconditionally gives, transfers, and assigns to the National Museum of the Marine Corps by way of gift, all rights, titles, and interests (including all copyright, trademark, and related interests), in, to, and associated with the objects.”

(e) Gift Splitting Prohibited. Gifts with a market value exceeding \$200,000 will be forwarded to the appropriate acceptance authority. MCU activities will not artificially split offers of gifts in order to avoid exceeding the \$200,000 threshold for President, MCU acceptance authority.

(f) Class Gifts. Students may offer a class gift to their school, program, or to MCU at the end of the Academic Year per reference (u). Such gifts must be voluntary and should not exceed the aggregate level of \$300. School and program directors may acknowledge and take custody of such gifts; however, if said gift exceeds the aggregate level then the acceptance authority resides with President, MCU and the standard gift acceptance procedures contained herein apply.

(g) Gifts from Foreign Governments. Gifts from international military students (IMS) are considered gifts from a foreign government and will be treated per reference (c). No IMS is expected or will be asked to provide a gift; however, voluntary gifts offered from an IMS may be accepted as follows:

1. Gifts of minimal value (\$305 or less) received as souvenirs or marks of courtesy may be accepted and retained by the recipient. This includes, for example, birthday presents between an IMS and assigned sponsor’s family members, and end of year mementos offered to faculty and staff.

2. Gifts greater than minimal value will not normally be accepted. The donor should be informed that statutory provisions and Department of Defense (DoD) policy prohibit the acceptance of such gifts. If refusal of such a gift would likely cause embarrassment to the donor or could adversely affect the foreign relations of the United States, it may be accepted as a gift to the Marine Corps and becomes Marine Corps property. It will be processed and accounted for IAW reference (c).

(h) Gifts of Personal Property to the Library of the Marine Corps (LoMC) and GRC Archives. Common gifts of personal property to MCU are donations by individuals, or family members of deceased individuals, of books and journals to the LoMC’s Research and Base Library Branches, and personal papers to the Archives. Offers of books, journals, and personal papers will not normally be accepted unless offered as free and clear gifts with the donor giving up all rights to them. Exceptions may be made in the cases of donors who desire to offer gifts of personal papers to the Archives on the condition that truly personal items (e.g., letters to and from family members) not be made available to patrons for a designated length or period of time.

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1. Personal Paper Donations. After the offer or receipt of donation, LoMC personnel will fill out a gift recommendation letter for approval/disapproval. Archive staff will review donations and forward to the MCU FMO a recommendation to accept or reject each collection/item. If the donor has not signed the donor offer form, the Archives staff will send the donor offer form for signature with a request to return signed within 30 days. If signed offer form is not received within this time frame, a reminder will be sent with an additional 30-day extension. If the signed form is still not received, the donation will be returned to the donor. The FMO will route the gift acceptance package to QACO for review prior to routing for acceptance to the appropriate authority.

2. Books and Serials Donations. After the offer or receipt of donation, LoMC personnel will fill out a gift recommendation letter for approval/disapproval. LoMC staff will review donations and forward to the MCU FMO a recommendation to accept or reject each collection/item. The FMO will route the gift acceptance package to QACO for review prior to routing for acceptance to the appropriate authority.

3. Communication with Donors. Director, HD/GRC will ensure that potential donors are informed of this policy, and that LoMC and Archives personnel taking custody of the offered gift does not constitute gift acceptance nor, in the case of personal papers, concurrence with a donor's conditions, if any. In such cases where a conditional gift is offered, Director, HD/GRC will review and document the conditions before the gift is accepted.

4. Acceptance and Subsequent Maintenance and/or Disposition. If accepted by President, MCU, Director, HD/GRC will maintain, and may subsequently dispose of, gifts of books, journals, and personal papers IAW LoMC and Archives collection development policies. Letters of gratitude will be sent out by the LoMC or Archives.

(4) Gifts of Money. The term "money" refers to cash, checks, or other forms of negotiable instruments. **Money may not be accepted by DoD employees, including active duty personnel. Checks or other negotiable instruments will not be written or made out to DoD employees or active duty personnel at any time.** All offers of gifts of money will be referred to the FMO for review. The FMO will forward to the appropriate acceptance authority, via the chain of command, all gifts of money IAW reference (o).

(a) Acceptance Authority and Processing. The acceptance authority for offers of money up to \$200,000 is President, MCU. All gifts of money are reviewed by QACO before being routed to the acceptance authority. All negotiable instruments are secured in the MCU FMO safe. Gifts of money to be accepted by the UNSECNAV, i.e., gifts of money in excess of \$200,000, will be processed by DON/AA. MCU FMO will promptly notify DON/AA upon receipt of such offers.

(b) Gift Funds Control and Local Deposit Processing. Funds controls are maintained by the Fiscal Accountable Official (FAO). The FAO is appointed in writing and is the designated authority to safeguard all forms of money as gifts to MCU. The FAO is the only

## **GIFT ACCEPTANCE PROCEDURES**

individual allowed access to the safe and authorized to hold cash, checks, or other negotiable instruments until delivered to the FMO for deposit into the Navy General Gift Fund.

1. Funds Control. This applies to all cash, checks, or other negotiable instruments received by the FMO after formal acceptance and notification or during processing of letters being forwarded to higher acceptance authority. Once the actual negotiable instrument is received, the FAO stores them in the designated safe, which is for the FAO's exclusive use. Only the FAO may know the combination of the safe, which must be changed every six months, per Volume 5, Chapter 3 of reference (h).

2. Local Deposit Processing. All gifts of money accepted by President, MCU valued at \$200,000 and below are processed and deposited locally. Once the gift acceptance memorandum is signed by President, MCU, contact is initiated by the designated liaison with the donor to inform him/her of the acceptance. The donor may then proceed with delivery of the negotiable instrument to the FAO. Once received, funds control procedures above are executed. A DD Form 1131 is generated and delivered to the Quantico Finance Office, Fiscal Agent for processing. Copies of all signed documents are retained on file for six years and three months IAW reference (h) and sent to CMC, Programs and Resources, Fiscal Operations Division to include notification to AAUSN. Notification of authority and authorization to execute funds is issued via Training and Education Command (TECOM) on a NAVCOMPT 372.

3. Collection and Deposit Reporting. All cash collection and balance sheet reporting responsibilities via the DD Form 2665 and DD Form 1081 will be maintained by the Quantico Finance Office IAW reference (h).

(c) Gift Funds Authorization. Gifts of money are first processed for acceptance IAW the above procedures. Notification of authority and authorization to execute funds is issued via TECOM on a NAVCOMPT 372. Thereafter, the same procedures and distribution channels regarding gift fund authorizations apply as those of Operations and Maintenance, Marine Corps (OMMC) appropriated funds. Once the NAVCOMPT 372 is received by MCU FMO, authority to execute is distributed to subordinate units via an authorization letter.

(d) Gift Funds Execution. All gifts of money deposited into the DON Gift Fund, Marine Corps, are executed IAW the same rules and regulations governing OMMC appropriated funds (APF) and should be spent for the designated purpose outlined by the donor. The execution is subject to reference (t) regarding purpose, time, and amount statutes. Disagreements between the gift trust fund intended beneficiary and the Director, Financial Management regarding the appropriateness of a desired use of the funds will be resolved by VPBA.

1. Business Feeder Systems. Each MCU subordinate unit receives an authorization letter detailing the amount and funded category. The DON Gift Fund, Marine Corps, is designated as Basic Symbol 8716, Budget Line Item 1202. All gift funds are allotted and expensed using these appropriation data elements. The Defense Travel System (DTS) is used for Temporary Additional Duty (TAD) travel requirements. The Government Commercial Purchase Card is used for small open purchase items. Purchase Request Builder is used for larger dollar

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amounts requiring a contract to be issued and the Direct Supply Stock Control/ServMart card may be used for available appropriate items. Execution is charged to the applicable unit's Budget Execution Activity/Budget Execution Sub-Activity code.

2. Prohibited and Special Attention Items. When utilizing the DON Gift Fund, Marine Corps, funds must be executed IAW applicable fiscal law. The required annual Fiscal Law Training identifies appropriate purchases and should be utilized when making purchasing decisions. The list below, while not all-encompassing, outlines some prohibited expenses when utilizing the DON Gift Fund (exceptions apply, contact the MCU FMO with questions).

- a. Bottled water.
- b. Clothing, apparel, and special equipment.
- c. Food and refreshments.
- d. Trophies, gifts, awards, plaques, and other mementos used as give-away items.
- e. Uniforms.

3. Reporting/Reconciliation. Foundation (and other non-federal) gift funding in the DON Gift Fund is recorded in the Standard Accounting, Budgeting, and Reporting System – the Marine Corps accounting system of record – along with other business feeder systems. All such funds executed are tracked by the subordinate unit and reconciled monthly with the donor. MCU FMO will comply with the quarterly reporting requirement to DFAS with HQMC (JAD) and AAUSN.

(5) Gifts of travel. Gifts of travel from non-federal sources may be paid to the Government, in kind or by reimbursement, for the expenses of travel, accommodations and meals for Government officials and employees attending meetings, conferences, or events of a similar nature. **Money or other negotiable instruments may not be accepted by DoD employees, including active duty personnel.** If benefits are provided by reimbursement of expenses, checks must be made payable to the "Department of the Navy", not to the employee.

(a) All uniformed and civilian faculty, staff, and students traveling on a gift accepted by President, MCU will travel on official orders processed through the DTS.

1. If the gift is of an in kind nature (e.g., the donor pays directly for hotels, meals, transportation, etc.), these costs will be processed as zero-charge items in the DTS authorization. DTS Approving Officials will ensure that all expenses that are being gifted in kind are properly zeroed out on authorizations and vouchers with appropriate comments. Per diem incidentals entitlements are not able to be processed as in kind gifts, however meals that are gifted in kind will be deducted from DTS authorizations.



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2. If the donor wishes to write a check to the DON to pay for travel expenses, the Director, Financial Management will ensure that the Quantico Finance Office processes the check IAW paragraph (2) (b) (4). A DTS line of accounting pointing to the gift trust fund will be used for all expenses gifted by the donor. **The DTS authorization cannot be approved until the gift of money is fully received, accepted, and processed IAW paragraph (2) (b) (4).**

3. Gifts of travel, both in kind and via money, are subject to DoD, DON, and Marine Corps conference attendance policies, as applicable. They are also subject to MCU TAD approval procedures.

(b) VPBA has been delegated approval authority for gifts of travel and will ensure that all gifts of travel meet the requirements outlined in references. Gifts of travel are also reviewed by QACO prior to processing for acceptance by VPBA.

(c) The MCU FMO will report gifts of travel greater than \$250.00 to HQMC (JAD) semiannually on 30 April and 30 October, or as directed.

(6) Gifts of Services. Per reference (e), gifts of service may be accepted that benefit the NMMC and its programs or military educational institution programs. Gifts of services will be processed IAW the same procedures as with gifts of personal property.

(7) Gifts of Gratuitous Services. MCU schools and directorates will notify VPBA via the GAPM when volunteer services are offered. All voluntary services will be accepted IAW enclosure (2). Current copies of all MCU executed Volunteer Service Agreements are maintained by the MCU Civilian Personnel Office (CPO). The CPO is also responsible for quarterly validation of all volunteers working within the command.

(8) Gifts of Consumables. Consumables are defined as coins or food, non-alcoholic beverages, flowers, candy, coffee, etc., to be consumed. Gifts of consumables will be processed IAW the same procedures as with gifts of personal property.

### d. Anonymous/Unknown Donors

(1) General. No gift may be accepted without sufficient evidence to establish the authority and intention to make a gift. Where property is deposited, mailed, or otherwise forwarded to MCU components without specific evidence of authority and intent, MCU may take reasonable steps to confirm and document the authority and intent to make a gift. Once the authority and intent is confirmed, then normal gift acceptance procedures may continue. If authority and intent cannot be established, the gift may not be accepted. The gift shall be returned to the deliverer, if possible. Otherwise, property will be treated as abandoned property.

(2) LoMC/NMMC Exception. Typically, gifts to the LoMC from unknown donors come in the form of items left in the book drop or on the doorstep of the LoMC. Such items will be reported to the MCU FMO and held for two weeks in case claimed. After two weeks, LoMC forwards the items to Collection Management for acceptance and recommendation, and initiates



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the gift acceptance process. Items left without documentation or “found in collection” at NMMC will be processed as “undocumented property and objects” per NMMC policy.

e. Future Gifts. Although there is no legal authority to accept a gift before it is actually available for transfer to the DON, MCU may accept offers of future gifts (e.g., pledges to raise money, or offers to purchase items for later delivery) under the following two-step procedure:

(1) Acknowledgement. When the donor makes a pledge or offer of a future gift, whether a one-time gift or a gift made in several installments, the total cumulative amount of the future gift determines the appropriate acceptance authority. The acceptance authority shall determine whether the DON is likely to accept the gift under the criteria of reference (a) when the actual donation occurs. If the DON is likely to accept the gift, the acceptance authority will acknowledge the gift and advise the donor that gift acceptance will likely occur after actual presentation of the gift, portion, or installment to MCU.

(2) Acceptance. When the donor presents the gift, portion or installment to MCU, the value of the gift presented on that occasion determines the proper acceptance authority for that gift, portion or installment. If the value of the gift, portion or installment exceeds the authority delegated to President, MCU, MCU may request a one-time delegation of greater acceptance authority for gifts acknowledged above.

### (3) Caveats

(a) An information paper will be included in the gift acceptance package for any gift package offer valued \$10,000 or more. The routed correspondence will include:

1. A complete description of the gift, including the quantity, condition, material, and approximate size and weight, value, and intended uses;
2. Any conditions or implicit assumptions under which the offer of gift is being made;
3. All pertinent facts concerning the donor’s present and prospective business relationships with the DON and any documentation relevant to the gift or donor;
4. A summary of the item’s significance to the DON;
5. An Activity recommendation for acceptance/rejection based on criteria contained in reference (a).

(b) Any gift offer of an item submitted in the annual enhancement opportunities proposal roll-up sent to the foundations is considered already “acknowledged” by virtue of the acceptance authority’s communication, and foundations’ receipt thereof.

## GIFT ACCEPTANCE PROCEDURES

(c) The only types of gifts that may be considered “future gifts” are gifts of personal property, real property, intellectual property, and money (due to the nature of gifts of travel, service, and consumables).

(d) For “pop-up” enhancement opportunities not covered by the annual enhancement opportunities proposal roll-up, the foundation liaisons, by direction of the President, MCU, will include the following written formal acknowledgement of the future gift in their communication with the foundations when sending the enhancement worksheet: “Thank you for considering this enhancement opportunity. Please consider this a formal acknowledgement from the President, MCU of any future gift offer pertaining thereto.”

(e) In exceptional circumstances where a time sensitive offer must be expeditiously accepted, e.g., an offer of tickets to a near-term event or a gift of travel to an event taking place in a short time, Activities may forward the offer directly to the acceptance authority via e-mail informing the FMO via carbon copy.

f. Disapproval/Non-acceptance. In the event that a gift offer is determined to not be acceptable, a gratitude letter is sent to the donor informing them of the determination and thanking them for the offer. In the case of offers of objects to NMMC, the communication will be delivered by the appropriate curator and sent up the chain of command only in exceptional cases. If a check or other negotiable instrument was received, this will also be returned to the donor at that time.

## VOLUNTARY SERVICES PROCEDURES

### 1. Volunteer Services Program

a. Authority. Reference (a) provides authority to accept voluntary services to support Marine Corps University (MCU) education and military museum programs. The authority to accept volunteer services from individuals rests with the Secretary of the Navy (SECNAV), and his designees within their delegated authority. President, MCU has delegated the authority to accept these voluntary services to Vice President, Business Affairs.

b. Volunteer Services Procedures. Effective management of volunteers is an important element of a successful volunteer program. MCU will ensure through consultation with Quantico Area Counsel that all volunteer services are consistent with applicable laws and regulations before President, MCU may accept any offer of voluntary services from any individual. References (l) and (m) authorize the acceptance of voluntary services from individuals to assist the regularly funded workforce, subject to the following requirements and limitations:

(1) The volunteer will not be compensated for volunteer services by the activity of the Federal Government.

(2) Before performing any volunteer work, each volunteer must sign a DD Form 2793, Volunteer Agreement. A completed copy of the form will be given to the volunteer before commencing volunteer services, and upon termination of volunteer services. Additionally, parental permission must be documented for any volunteer under the age of 18.

(3) Volunteers will be provided with a clear, written description of the duties and scope of responsibilities to be performed.

(4) MCU components must ensure that the volunteer is licensed, privileged, has appropriate credentials, or is otherwise qualified under applicable law or regulations to provide services.

(5) Volunteers will not be placed in a policy-making or in supervisory positions over MCU employees or military personnel.

(6) Volunteers will not displace an employee in an authorized paid position.

(7) Volunteer services will not be used to fill vacant positions when funding has been provided to hire staff or obtain service by contract.

(8) Volunteers may not perform duties for which there is an unfilled manpower requirement or circumvent the civil service personnel systems.

(9) For the benefit of the MCU activity and the volunteers, MCU Civilian Personnel Office will maintain records of each volunteer's scope of duties, volunteer hours, and training provided by MCU.

## VOLUNTARY SERVICES PROCEDURES

(10) Volunteers may be authorized reimbursement for incidental expenses incurred as a result of the services rendered. Reimbursement may be from MCU appropriated funds that are authorized for use in support of the MCU activity involved. Examples of incidental expenses include: parking fees and tolls, general admission costs, and subsistence and lodging expenses incurred by the volunteer during the provision of volunteer services.

2. Volunteer Status. A volunteer is not an employee of MCU, and is not entitled to any compensation from the Federal Government for any volunteer services provided to MCU. However, a volunteer, when acting within the scope of the services accepted by MCU, will be considered an employee of the Federal Government under applicable law and regulations, only for the purposes of workers compensation, criminal conflicts of interest, and defense of certain torts, privacy, and malpractice claims arising from their performance of assigned volunteer duties.

3. Volunteer Support. MCU may provide training and support for approved volunteers, including:

a. Volunteer orientation and training to familiarize volunteers with the organization, their assigned duties, procedures to document the number of hours of voluntary services provided, policies and procedures for obtaining reimbursement of incidental expenses, safety or privacy requirements, and other relevant matters.

b. Use of Government facilities to include dedicated office or desk space, equipment, supplies, computers, and telephones as needed to accomplish assigned volunteer duties.

c. Use of Government mail as necessary and appropriate to execute assigned volunteer duties.

d. Access to Government information as needed to accomplish assigned volunteer duties. MCU components will ensure compliance with references (o) and (p) concerning disclosure of privacy-protected records. Officially sanctioned volunteer duties that include access to privacy-protected records may require training to ensure compliance with applicable law and regulations.



MARINE CORPS UNIVERSITY ROUTING SHEET (INTERNAL)

1. DATE	31 May 2018
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2. OPERATION CODE

3. Subject:  
Gift Acceptance and Volunteer Services Policy Letter

- |   |                                   |
|---|-----------------------------------|
| X - ORIGINATOR OR OFFICE AFFIXING ROUTING SHEET | G - INFORMATION                   |
| A - APPROPRIATE ACTION                          | H - RETURN TO                     |
| B - GUIDANCE                                    | I - INITIAL                       |
| C - SIGNATURE                                   | J - DISPOSITION                   |
| D - COMMENT                                     | K - DECISION                      |
| E - RECOMMENDATION                              | L - RETENTION                     |
| F - CONCURRENCE                                 | X - ORIGINATOR                    |
|   | O - (OTHER) <u>Other (define)</u> |

4. NATURE OF ACTION REQUIRED	ORIGINATOR INITIALS	DUE DATE (IF ANY)
ROUTINE	SMP	
URGENT		

5. REFERENCE HELD BY (NAME, GRADE, OFFICE, PHONE)  
Capt Nathaniel Richardson, MCU Deputy Director, Financial Management, (703) 432-2485

6. RTG	7. OPR CODE	8. ADDRESSES	9. DATE		10. INITIALS	
			IN	OUT	CONCUR	NOT CONCUR
5	C	PRESIDENT		6/2		
4	A	CHIEF OF STAFF		6/19		
3	A	Executive Secretary to Pres	6/21	6/27		
		Staff Sec				
		SgtMaj				
		SSEC Chief				
		Protocol Officer				
		VP ACADEMIC AFFAIRS				
		-Research, Assessment, and Planning				
		-Academic Support Div.				
		-PME policy & Ops Div				
		-Middle East Studies				
		-Fellowship/Olmstead/FPME				
		-Operational Culture				
		-Case Study Development				
		-Minerva Project				
		-East Asian Studies				
		-MAGTF Instructors Group				
2	F	VP BA		6/20		
1	I,A	-Admin Services	6/4	6/4		
	X,H	-Financial Management		5/31		
		-Facilities				
		-IET				
		-Student Services				
		VP I&RS/DIR, GRC				
		DIR, History Division				
		DIR, MCWAR				
		DIR, SAW				
		DIR, CSC				
		DIR, EWS				
		DIR, EPME				
		-DIR, SNCOA				
		DIR, NMMC				
		Dir, Lejeune Leadership Inst				
		-Deputy Dir, LLI				

5a. REFERENCE FILENAMES (IF APPLICABLE)

11. REMARKS AND SIGNATURE

- Tab:** (A) Policy Letter 1-18  
(B) Gift Acceptance Procedures  
(C) Voluntary Services Procedures

- PURPOSE.** To establish Gift Acceptance and Volunteer Services policy reflecting recent changes implemented by SECNAVINST 4001.2K.
- DISCUSSION.** The current Gift Acceptance and Volunteer Services Policy is based on SECNAVINST 4001.2J. This revision reflects changes implemented by SECNAVINST 4001.2K dated 7 May 2018.
- RECOMMENDATION.** Recommend President, Marine Corps University signature on policy letter.

Respectfully,  
  
 STACY M. PATZMAN

1 JUNE 2018 - RETURNED TO FISCAL FOR CORRECTIONS.

JUN 04 2018 1075



