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Owner: Dhannetta Brown: Deputy CFO
Policy Area: Management & Budget
References:

Contributions, Sponsorship and Public Relations Policy

POLICY

It is the policy of Detroit Wayne Mental Health Authority (DWMHA) to provide guidance in managing external relations and activities.

PURPOSE

The purpose of this policy is to outline the type of activities the Detroit Wayne Mental Health Authority (DWMHA) are allowed to engage in to benefit our mission to provide exemplary services to the over 70,000 consumers we serve.

APPLICATION

1. The following groups are required to implement and adhere to this policy: DWMHA Board, DWMHA Staff
2. This policy serves the following populations: Adults, Children, I/DD, SMI/SEI, SED, SUD, Autism
3. This policy impacts the following contracts/service lines: MI-HEALTH LINK, Medicaid, SUD, Autism, Grants, General Fund

KEYWORDS

1. Code of Federal Regulations (CFR) - The codification of the general and permanent rules and regulations published by the Federal Government of the United States.

STANDARDS

1. **GENERAL PROVISIONS**
 - a. The following excerpts were obtained directly from 2 CFR 225 - Costs Principles for State, Local and Indian Tribal Governments. In accordance with the State of Michigan Prepaid Inpatient Health Plan (PIHP) and Community Mental Health Services Provider (CMHSP) contracts, 2 CFR 225 is the cost principles required to be used by the DWMHA.
 - b. For the purpose of this document, the DWMHA is the governmental unit and federal awards include all DWMHA funding received including but not limited to Medicaid and State General Fund dollars. Local dollars may be used to procure these goods and/or services.

2. ADVERTISING AND PUBLIC RELATIONS COSTS

- a. The term advertising costs means the costs of advertising media and corollary administrative costs. Advertising media include magazines, newspapers, radio and television, direct mail, exhibits, electronic or computer transmittals, and the like.

The only **allowable** advertising costs are those which are **solely** for:

1. The recruitment of personnel required for the performance by the governmental unit of obligations arising under a Federal award;
 2. The procurement of goods and services for the performance of a Federal award;
 3. The disposal of scrap or surplus materials acquired in the performance of a Federal award except when governmental units are reimbursed for disposal costs at a predetermined amount; or
 4. Other specific purposes necessary to meet the requirements of the Federal award.
- b. The term public relations includes community relations and means those activities dedicated to maintaining the image of the governmental unit or maintaining or promoting understanding and favorable relations with the community or public at large or any segment of the public.

The only **allowable** public relations costs are:

1. Costs specifically required by the Federal award;
 2. Costs of communicating with the public and press pertaining to specific activities or accomplishments which result from performance of Federal awards (these costs are considered necessary as part of the outreach effort for the Federal award); or
 3. Costs of conducting general liaison with news media and government public relations officers, to the extent that such activities are limited to communication and liaison necessary to keep the public informed on matters of public concern, such as notices of Federal contract/grant awards, financial matters, etc.
- c. **Un-allowable** advertising and public relations costs include the following:
 1. All advertising and public relations costs other than as specified in subsections A and B;
 2. Costs of meetings, conventions, convocations, or other events related to other activities of the governmental unit, including:
 - a. Costs of displays, demonstrations, and exhibits;
 - b. Costs of meeting rooms, hospitality suites, and other special facilities used in conjunction with shows and other special events; and
 - c. Salaries and wages of employees engaged in setting up and displaying exhibits, making demonstrations, and providing briefings;
 3. Costs of promotional items and memorabilia, including models, gifts, and souvenirs;
 4. Costs of advertising and public relations designed solely to promote the governmental unit.

3. DONATIONS AND CONTRIBUTIONS

- a. Contributions or donations, including cash, property, and services, made by the governmental unit, **regardless of the recipient, are un-allowable.**

4. ENTERTAINMENT

- a. Costs of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as **tickets** to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are **un-allowable**.

5. FUNDRAISING AND INVESTMENT MANAGEMENT COSTS

- a. Costs of organized fundraising, including financial campaigns, solicitation of gifts and bequests, and similar expenses incurred to raise capital or obtain contributions are **un-allowable, regardless of the purpose for which the funds will be used**.
- b. Costs of investment counsel and staff and similar expenses incurred to enhance income from investments are un-allowable. However, such costs associated with investments covering pension, self-insurance, or other funds which include Federal participation allowed by 2 CFR 225 are allowable.

6. MEMBERSHIP, SUBSCRIPTIONS AND PROFESSIONAL ACTIVITY COSTS

- a. Costs of the governmental unit's memberships in business, technical, and professional organizations are allowable.
 - b. Costs of the governmental unit's subscriptions to business, professional, and technical periodicals are allowable.
 - c. Costs of membership in civic and community, social organizations are allowable as a direct cost with the approval of the Federal awarding agency.
 - d. Costs of membership in organizations substantially engaged in lobbying are un-allowable.
7. This policy is applicable for sponsorships whereby the DWMHA purchases an advertisement in a brochure or pamphlet, the purchase of tickets to providers, physicians and the like. Unless, the request meets one of the aforementioned, such activity is un-allowable.

QUALITY ASSURANCE/IMPROVEMENT

DWMHA shall engage an independent auditor to provide reasonable assurance that the financial reporting controls of the DWMHA are reliable and prepared in accordance with Generally Accepted Accounting Principles along with the DWMHA's adherence to this policy.

COMPLIANCE WITH ALL APPLICABLE LAWS

DWMHA staff are bound by all applicable local, state and federal laws, rules, regulations and policies, all federal waiver requirements, state and county contractual requirements, policies, and administrative directives, as amended.

LEGAL AUTHORITY

1. 2 CFR 225 - Cost Principles for State, Local and Indian Tribal Governments
2. Generally Accepted Accounting Principles (GAAP)
3. Governmental Accounting Standards Board (GASB)

RELATED POLICIES

1. Disbursement Policy
2. Fiscal Control & Accountability Procedure
3. Procurement Policy

RELATED DEPARTMENTS

1. Administration
2. Compliance
3. Legal
4. Management & Budget
5. Purchasing

CLINICAL POLICY

NO

INTERNAL/EXTERNAL POLICY

INTERNAL

Attachments:

No Attachments

Approval Signatures

| Approver | Date |
|--|---------|
| Dana Lasenby: Acting Chief Executive Officer | 01/2018 |
| Allison Smith: Project Manager, PMP | 01/2018 |
| Michele Vasconcellos: Director, Customer Service [AS] | 12/2017 |
| Bessie Tetteh: CIO [AS] | 12/2017 |
| Lorraine Taylor-Muhammad: Director, Managed Care Operations [AS] | 12/2017 |
| Maha Sulaiman: Director of Utilization Management [AS] | 12/2017 |
| Andrea Smith: Director of Clinical Practice Improvement [AS] | 12/2017 |
| William Sabado: Chief of Staff [AS] | 12/2017 |
| Michael Rangos: Director of Procurement [AS] | 12/2017 |
| Crystal Palmer: Director, Children's Initiatives [AS] | 12/2017 |
| Darlene Owens: Director, Substance Use Disorders, Initiatives [AS] | 12/2017 |
| Corine Mann: Chief Strategic Officer/Quality Improvement [AS] | 12/2017 |
| Rolf Lowe: Assistant General Counsel/HIPAA Privacy Officer [AS] | 12/2017 |
| Julia Kyle: Director of Integrated Care [AS] | 12/2017 |

| Approver | Date |
|--|-------------|
| Kip Kliber: Director, Recipient Rights [AS] | 12/2017 |
| Eric Doeh: Compliance Officer [AS] | 12/2017 |
| Donna Coulter: Dir. of OPA [AS] | 12/2017 |
| Jody Connally: Director, Human Resources [AS] | 12/2017 |
| Brooke Blackwell: Communications Director [AS] | 12/2017 |
| Mary Allix: Director of Quality Improvement [AS] | 12/2017 |
| Jean Alce: Interim Medical Director [AS] | 12/2017 |
| Dhannetta Brown: Deputy CFO [AS] | 12/2017 |
| Stacie Durant: CFO Management & Budget | 12/2017 |

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