
Effective Date: **April 1, 2016** Revised: **October 21, 2017**

POLICY

FINANCE AND ADMINISTRATION, PRIVACY AND SECURITY, RESEARCH AND SCHOLARLY ACTIVITIES, STUDENT LIFE

Crowdfunding Policy

RESPONSIBLE OFFICE

Office of the University Provost

Purpose

The purpose of the Boston University Crowdfunding Policy (“the Policy”) is to ensure that fundraising campaigns and projects undertaken by individuals or groups that claim to do so on behalf of Boston University or Boston University-affiliated entities, receive the necessary approvals and are subject to all Boston University rules, policies, compliance regulations and state and federal law. The Policy is aimed at protecting the use of Boston University’s name, brand, and logo, and ensuring that such fundraising and related crowdfunding projects are consistent with the University’s interests and are appropriately designed and presented to the donor community.

Covered Parties

This Policy applies to:

1. Boston University faculty, staff, administrators and other individuals who associate themselves with Boston University, including alumni and parents.
2. Outside groups, club, or organizations formally affiliated with Boston University who claim to represent and/or be raising funds for Boston University or a Boston University group or organization through use of a crowdfunding project or campaign, such as alumni organizations.
3. Graduate and undergraduate students who are using crowdfunding in connection with Project/Campaigns which involve research or scholarly or creative works.

The Policy applies to all such parties whether they utilize the BU Crowdfunding Platform or a third-party crowdfunding vendor, site, portal, or service provider.

Exclusions

The Policy does not apply to:

1. Crowdfunding by student teams or organizations sponsored by the Department of Physical Education, Recreation, & Dance (PERD) or student teams or organizations sponsored by the Department of Athletics.
2. Crowdfunding by student clubs or organizations, both informal as well as those that are recognized by and registered with the Student Activities Office.

All Crowdfunding activities undertaken by student teams or organizations sponsored by PERD must follow the Crowdfunding Guidelines set forth by PERD.

All Crowdfunding activities undertaken by student teams or organizations sponsored by the Department of Athletics must follow the Crowdfunding Guidelines set forth by the Department of Athletics.

All Crowdfunding activities undertaken by student clubs or organizations, both informal and those recognized by and registered with the Student Activities Office must follow the Crowdfunding Guidelines set forth by the Student Activities Office.

The policy also does not apply to individuals who merely state their affiliation with Boston University as a fact (e.g. “I am a student at Boston University”) but do not use University resources and do not claim to represent or be raising funds for Boston University or a Boston University-affiliated entity.

Defined Terms

“**Affiliates**” refers to Boston University students, faculty, staff, and administration and other members of Boston University-affiliated groups or organizations or other individuals who associate themselves with Boston University, including alumni and parents, who claim to represent and/or be raising funds for, Boston University or a Boston University Affiliated Entity.

“**Affiliated Entity**” refers to a group, club, or organization affiliated with or sponsored by Boston University. These include but are not limited to student clubs both informal and registered, alumni groups, an academic department, or a research laboratory led by a Boston University faculty member.

“**Crowdfunding**” refers to the practice of funding a project or campaign by soliciting relatively small donations of money from a large number of people, typically via the Internet.

“**BU Crowdfunding Platform**” is Boston University’s [community fundraising platform](#) that is restricted to use by Affiliates.

“**Project/Campaign**” refers to any type of crowdfunding undertaken by Affiliates including, by way of example not limitation, crowdfunding research or scholarship, crowdfunding creative work (e.g. movies, plays, music), crowdfunding non-profits or “social good” ideas, crowdfunding entrepreneurial ideas, or crowdfunding travel. This list is not exhaustive, and this definition is intended to be construed broadly to encompass any/all crowdfunding campaigns or projects undertaken by Affiliates.

“**Boston University Resources**” refers to the use of Boston University’s branding, name or

logo, Boston University intellectual property, Boston University IS&T or computing resources (e.g. Boston University computers and Internet networks), Boston University research or laboratory resources, Boston University facilities, or Boston University email lists. This list is not exhaustive, and this definition is intended to be construed broadly to encompass any/all Boston University resources used in any crowdfunding Project/Campaign.

“Boston University email lists” refers to any and all email lists maintained by Boston University or obtained from an official University source.

“Authorizing Official” is the highest-level official (or designee) in the Boston University unit most closely connected with the Project/Campaign. For example, if the Project/Campaign seeks to crowdfund an aspect of research being conducted in the physics department, then the appropriate authorizing official is the Dean or the Dean’s designee. If the Project/Campaign seeks to crowdfund an aspect of a program in Athletics, then the appropriate authorizing official is the Director of Athletics or the Director’s designee. The appropriate authorizing official provides initial authorization for a Project/Campaign which is subject to final approval from the Office of the University Provost.

“Third-party crowdfunding” refers to any crowdfunding vendor, website or service provider (e.g. Kickstarter, Indiegogo, GoFundMe) not owned, licensed or operated by Boston University.

“Project Manager/Campaign Leader” is the Affiliate who has proposed a crowdfunding Project/Campaign and who is responsible for securing the necessary approvals for the Project/Campaign and for working with the Crowdfunding Mentor to conduct the Project/Campaign.

“Crowdfunding Mentor” refers to a member of Boston University’s professional fundraising staff in Development and Alumni Relations and the Office of Gifts and Records assigned to work with the Project Manager/Campaign Leader to ensure that the Campaign is consistent with the University’s overall development strategy and to support the Project/Campaign, develop content, and answer questions as part of the BU Crowdfunding Platform administration.

Policy

Projects/Campaigns that claim to be on behalf of Boston University or an Affiliated Entity, or that are undertaken on the BU Crowdfunding Platform or that use Boston University Resources, including Boston University branding, must designate a Project Manager/Campaign Leader responsible for seeking written approvals from the appropriate Authorizing Official.

Any such Campaign must have an associated project plan. The project plan must include a Project/Campaign description, funding level sought, budget identifying the use of funds, a set of deliverables, the timelines, and responsibilities. The project plan must specify the location of the account from which collected donations will be spent on the project, and the manner and schedule by which, if necessary, Boston University will be reimbursed for use of any Boston University resources. The project plan should include contingent plans if funding goals are not met. The project plan shall also include the name of the Crowdfunding Mentor with whom the Project Manager/Campaign Leader is working. The Crowdfunding Mentor shall assess whether the Campaign is appropriately designed and presented to potential donors and consistent with the University's overall development strategy.

Initial approval, as described below, shall not be provided without a project plan. The appropriate Authorizing Official with responsibility for initial approval will review and respond to project plan proposals that are inadequate or incomplete.

Initial approval for a Campaign must come from the Authorizing Official. It will be the responsibility of the Authorizing Official to ensure that the Campaign budget adequately covers the costs associated with the work (such as the use of campus facilities). Once a Campaign has been approved in writing by the Authorizing Official, final approval and a decision about whether and when to place it on the BU Crowdfunding Platform will be made through a vetting process conducted by the Office of the University Provost (see Responsible Parties below).

All funds raised through crowd funding campaigns to fund research must be sufficient to cover the total cost of conducting that research. For Project/Campaigns attempting to raise above \$50,000, Standard [ICR rates](#) apply. Per our [guidelines on F&A waivers](#), any request to reduce or waive standard ICR rates on campaigns greater than \$50,000 must be made to the

Associate Provost and Vice President for Research.

All Project/Campaigns that claim to be on behalf of Boston University or an Affiliated Entity, or that are undertaken on the BU Crowdfunding Platform or that use Boston University Resources, must provide clear information to potential donors as to whether the donors will receive a receipt for tax deduction purposes. Such information relating to potential tax deductibility of gifts should be made in consultation with the assigned Crowdfunding Mentor. Gifts made to Boston University must comply with both IRS regulations and Boston University policies.

A Project/Campaign that is undertaken by an Affiliate on any third-party crowdfunding platform that does not use any Boston University resources and that includes the individual's affiliation with Boston University merely as a statement of fact (e.g. "I am a student at Boston University") and that clearly and unequivocally does not claim to be raising funds for or on behalf of Boston University or an Affiliated Entity does not require institutional approval. All other Boston University rules, policies, compliance regulations and state and federal law, where applicable, pertain to such Project/Campaigns, including limitations arising from policies concerning outside consulting ([see Boston University's policy for External Compensated Activity](#)).

Responsible Parties

The Office of the University Provost is responsible for overseeing the vetting of Project/Campaigns projects for inclusion on the BU Crowdfunding Platform, for ensuring compliance with the Policy in collaboration with the Office of Development and Alumni Relations and for final approval of proposed Projects/Campaigns. Included within the considerations relevant to final approval is a determination that the proposed Project/Campaign is consistent with the University's interests and overall development strategy.

Proposed Projects will be placed into one of three categories for the purpose of vetting and final approval: 1) Research, Scholarly and Creative Works; 2) Student Organizations sponsored by Boston University Schools or Departments other than PERD or the Department of Athletics; or 3) Other Student Projects (Graduate and Undergraduate). Primary

responsibility for final approval and other decisions in each of these areas will be made by the individuals indicated below in consultation with others as necessary.

1) Research, Scholarly and Creative Works

Decisions about faculty and graduate student Project/Campaigns which involve research or scholarly or creative works will be made by the Vice President and Associate Provost for Research.

Contact:

Office of the Vice President and Associate Provost for Research
One Silber Way, 8th Floor
research@bu.edu

Decisions about undergraduate student Project/Campaigns which involve research or scholarly works will be made by the Associate Provost for Undergraduate Affairs via the Undergraduate Research Opportunities Program (UROP).

Contact:

UROP Office
143 Bay State Road
uop@bu.edu

Decisions about undergraduate student Project/Campaigns which involve creative works will be made by the Dean of Students.

Contact:

Dean of Students
GSU, Third Floor
775 Commonwealth Avenue
dos@bu.edu

2) Student Organizations Sponsored by Boston University Schools or Departments other than PERD or the Department of Athletics

Decisions about Project/Campaigns that involve student organizations sponsored by Boston University Schools or Departments other than PERD or the Department of Athletics will be made by the Dean of Students.

3) Other Student Projects (Graduate and Undergraduate)

Decisions about all other student Project/Campaigns (both graduate and undergraduate, without a research or scholarly or creative works component) will be made by the Dean of Students.

All Project/Campaigns must be approved in accordance with this vetting process and must otherwise comply with this Policy before they are published to, or go live on, any crowdfunding site. Project Manager/Campaign Leaders are encouraged to seek approval as early as possible as it may take up to 30 days or more for Boston University final approval decisions.

Each administrative unit responsible for vetting proposals shall provide, on a quarterly basis, a report to the Crowdfunding Mentor on the Project/Campaigns that have been approved in the previous quarter.

Related Policies and References

Any research project must follow Boston University research policies and procedures, including, but not limited to, those regarding the use of human subjects or animals in research, conflicts of interest, and access to and retention of data. These are available at:

[BU Research Policies and Procedures](#)

Office of Research Compliance Policies and Procedures

For research involving human subjects or animals, a current approved protocol must be submitted at the time of submitting the Crowdfunding Project/Campaign for approval.

END OF POLICY TEXT

Additional Resources Regarding This Policy

History

On the recommendation of the University Provost and Chief Academic Officer, this policy was developed by an ad hoc drafting committee composed of the Dean of Students, Associate Provost for Strategic Initiatives, and Vice President and Associate Provost for Research in consultation with the crowdfunding project team in Development and Alumni Relations, the Council of Deans, the University Council Committee on Research & Scholarly Activities, and Provost's Cabinet. The Policy was approved by the University Council Committee on Research & Scholarly Activities on January 26, 2016.

Categories: Finance and Administration, Gifts, Privacy and Security, Research and Scholarly Activities, Student Life, University Policies Affecting Student Life