



# “Public Purposes” When the University Distributes Sports and Entertainment Tickets and Passes

<b>Responsible Officer:</b>	General Counsel & Vice President – Legal Affairs
<b>Responsible Office:</b>	GC- Legal Affairs
<b>Issuance Date:</b>	12/10/2018
<b>Effective Date:</b>	12/10/2018
<b>Last Review Date:</b>	11/29/2018
<b>Scope:</b>	University officials and employees.

<b>Contact:</b>	Dan Scannell
<b>Email:</b>	<a href="mailto:Dan.Scannell@ucop.edu">Dan.Scannell@ucop.edu</a>
<b>Phone:</b>	(510) 287-3844

## TABLE OF CONTENTS

I. POLICY SUMMARY .....	1
II. DEFINITIONS .....	2
III. POLICY TEXT.....	2
IV. COMPLIANCE / RESPONSIBILITIES.....	2
V. PROCEDURES.....	3
VI. RELATED INFORMATION.....	3
VII. FREQUENTLY ASKED QUESTIONS .....	3
VIII. REVISION HISTORY .....	3

## I. POLICY SUMMARY

The state Fair Political Practices Commission (FPPC) has adopted regulations allowing for the reporting of a public agency’s distribution of tickets and passes to entertainment events. Under FPPC Regulation 18944.1, tickets distributed by the University to University officials or employees for UC amateur athletic games or other events (plays, concerts, etc.) performed by students are not considered “gifts” by the FPPC and therefore need not be reported on FPPC forms. In other situations, tickets or passes given by the University to its officials or employees or third parties that accomplish a “public purpose” and disclosed by the University on FPPC Form 802 are not considered

**University of California – Policy**  
**Policy on Distribution of Ticket and Passes**

“gifts” under the state Political Reform Act of 1974. The tickets then do not need to be reported on the individual’s Form 700.

This policy describes the University’s “public purposes” to be accomplished through the University’s distribution of tickets or passes to both University sponsored events and non-University sponsored events.

---

## **II. DEFINITIONS**

---

**Immediate Family:** A University official/employee’s spouse or domestic partner and any dependent children.

---

## **III. POLICY TEXT**

---

The distribution of tickets or passes by the University under this policy to its officials/employees or to a third-party at the request of a University official/employee must accomplish a "public purpose" of the University.

Public purposes under this policy and for FPPC Form 802 include, but are not limited to, the following:

1. Conducting University business, including oversight of University events;
2. Recognizing University employees for their work and promoting staff morale;
3. Strengthening alumni and private support for the University;
4. Promoting intergovernmental relations and collaboration between the University and other public agencies;
5. Promoting support for University athletics, arts, cultural, and entertainment offerings;
6. Promoting attendance at University events in order to maximize potential University revenue from parking and concession sales;
7. Promoting civic engagement;
8. Promoting community outreach;
9. Attracting or rewarding volunteer service;
10. Otherwise promoting institutional advancement.

Once the University distributes tickets or passes to a University official/employee in accordance with this policy, the official/employee may not transfer the tickets or passes to any other person, except to members of the official's immediate family or no more than one guest solely for their attendance at the event.

---

## **IV. COMPLIANCE / RESPONSIBILITIES**

---

Each campus is responsible for tracking its own ticket distributions and reporting and posting any Form 802 on the campus’s website.

Authority: Government Code 83112, FPPC regulation 18944.1

## V. PROCEDURES

---

Campus contacts to advise and assist with procedures and forms can be found here: <https://www.ucop.edu/general-counsel/legal-resources/conflict-of-interest-coordinators.html>

FPPC Form 802 can be found here: <http://www.fppc.ca.gov/content/dam/fppc/NS-Documents/TAD/Agency%20Reports/Form-802.pdf>

---

## VI. RELATED INFORMATION

---

Under FPPC Regulation 18944.1, tickets distributed to University officials or employees for UC athletic games or events performed by students (plays, concerts, etc.) are not considered “gifts” by the FPPC and therefore need not be reported on FPPC Forms 700 or 802.

---

## VII. FREQUENTLY ASKED QUESTIONS

---

None.

---

## VIII. REVISION HISTORY

---

**December 10, 2018:** Revision to the Policy is due to the reinterpretation by the California State Fair Political Practices Commissions on its regulation concerning the distribution of tickets to entertainment and sports events. As described throughout the policy, Form 802 is not a required form, rather an optional form used in limited circumstances. Revisions include moving the list of contacts to a location that does not require a full policy review process to update.

The revised policy was also remediated to meet Web Content Accessibility Guidelines (WCAG) 2.0.

**July 1, 2012:** Policy was reformatted into the standard University of California template.

**January 1, 2012:** Policy was adopted on an emergency basis.

**September 27, 2011:** Interim Guidance was adopted.