

Business Conflicts of Interest Management Update

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Campus Guidance

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GENERAL POLICY UPDATES

- Removing “procedures” from policies where possible
- Removing “branding” of systems, companies, etc. in policies
- Linking to Institute, USG or State Accounting Office (SAO) websites and forms
- Removing telephone, fax and email addresses where possible – referencing websites

WHERE ARE WE?

- Met with Policy Steering Committee in April
- Submitted changes requested by committee in July
- Awaiting final review by Policy Steering Committee
 - Kelly Cross – Institute Policy Manager
 - Meeting with Controller's Office Financial Compliance team next week
- Policies will be published as soon as possible after review is complete
- Allowable Cost Matrix will be updated this month
 - Awaiting USG confirmation on several policies

CAMPUS GUIDANCE TOPICS

Topic	Policy Status	Action	Major Changes
General			
Executive Fringe Benefit Payments or Reimbursements	Development	Memo sent to campus in early 2019	<ul style="list-style-type: none"> Received guidance from USG & State Attorney General's Office Operational funds can be used for: <ul style="list-style-type: none"> Airport Parking, Non-Cash Employee Achievement Awards up to \$75, Professional Licenses, Certifications and Memberships Affiliate funding can be used for: <ul style="list-style-type: none"> Spouse meals travel, dining or golf club memberships, travel outside of policy, airline sky club lounge memberships, non-cash employee achievement awards over \$75, business, civic or community organization memberships Distributed feedback to ELT & Senior Leadership <ul style="list-style-type: none"> Document will be distributed to this group
Extra Compensation	Clarification	Are FAQ's on website?	<ul style="list-style-type: none"> FAQs recently issued from Provost's Office <ul style="list-style-type: none"> Will be distributed to this group
Wireless Communications Devices/ Cellular Telephone Services	Revision	White Paper will be developed	<ul style="list-style-type: none"> Proposed recommendations: <ul style="list-style-type: none"> Review of the Open Records Act & personal device usage Allowable data plan monthly reimbursement Equipment loan agreement requirement for devices >\$499 Process to wipe/dispose of data on devices using classified data/documents
Vendor Gifts	Clarification	Status will be reviewed with Policy Manager	<ul style="list-style-type: none"> Relevant policy: BoR policy 8.2 – Ethics (8.2.18.1), Conflicts of Interest and Conflicts of Commitment (8.2.18.2), Gratuities (8.2.18.4) Should not exceed \$75 (IRS guidelines also factored in) Should not be received by anyone in a relevant decision-making position

CAMPUS GUIDANCE TOPICS

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Allowable Cost Matrix			
Alcohol	Revision	Follow up with JulieAnne Williamson	<ul style="list-style-type: none"> • On campus and Off campus events require prior approval • New form for off-campus activities <ul style="list-style-type: none"> • i.e. business meals, entertainment, etc. • Additional approvals required if individuals under 21 will be present • Only allowable on non-operating or private funds
Uniforms and Clothing Provided to Employees	Development (new)	Under USG review	<ul style="list-style-type: none"> • Clarity on the taxability of clothing items provided to an employee: <ul style="list-style-type: none"> • Uniforms • Items of nominal value provided infrequently • Logo clothing • Sending to USG for review by next week
Noise Cancelling Headphones	Allowable Cost Matrix Guidance Only	Posted on Controller's Office website	<ul style="list-style-type: none"> • Options provided by OIT • Three low cost wired and wireless options suggested by Procurement • Consult local IT support for compatibility with computer/laptop
Payment or Reimbursement for Professional Licenses & Certifications	Development (new)	Under USG review	<ul style="list-style-type: none"> • Under review by USG Vice Chancellors • Clarity needed regarding when allowable <ul style="list-style-type: none"> • Req via job description; Req to perform job; 3rd Party Req'mnt
Purchase of Gifts for Employees/Students	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> • Received guidance from USG • Updated de minimis amount to \$75 annually • Length of service recognition updated from 10 years to 5 years • Non-cash gifts > \$75 unallowable from operating funds • Gift cards, gift certificates or other cash equivalents not allowed
Payment or Reimbursement for Memberships	Development (new)	Under USG review	<ul style="list-style-type: none"> • Under review by USG Vice Chancellors • Institutional memberships are allowable from operating funds • Discounted professional development – under discussion • Clarity needed – when are individual memberships allowed on operating funds

CAMPUS GUIDANCE TOPICS

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Procurement & Business Services			
Procurement of Group Meals for Employees, Students, & Official Visitors	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Updated Business Entertainment Meals and Alcohol Purchases section to include the usage of Board Approved affiliated funding (GTRC, GTARC, etc.)
Retreats & Campus Workshops for Faculty & Staff (policy #6.14)	Revision/Clarification	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Day Workshops – Noon meal changed to “meal” If food is itemized, per diem rates apply Copy of agenda needed along with invoice for payment Clarification on reimbursement of lodging and meals within 50 mile radius of home or work
Employee Events & Large Scale Business Meetings	Development (new)	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Draft policy under review by campus guidance committee Includes events to build employee morale, large scale business meetings, group meal, etc.
Travel Authorization Procedures (policy #6.2)	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Scope includes faculty, staff and students New section on declaration of outside professional activities (COI) New section for responsibilities of Traveler, Preparer and Approvers
Reimbursement for Travel Expenses – Employees (policy #3.13)	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Copy of agenda required for conferences/meetings/training Indicated potential taxability of reimbursements over 60 days Defined responsibilities for approvers, delegates and administrators
Non-Employee Travel (policy #6.16)	Revision/Clarification	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Travel expense reimbursement & reconciliation should be submitted w/in 10 days <ul style="list-style-type: none"> Should not exceed 45 calendar days Expenses for family of Prospective Employees/Students/Official Guests can be reimbursed using affiliated organization funding if approved in advance

CAMPUS GUIDANCE TOPICS

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Procurement & Business Services			
Trips Which Include Annual Leave/Personal Travel (policy #6.10)	Revision/Clarification	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Personal and business travel expenses should be kept separate Personal travel dates should be added to detailed trip description on TA Airfare quotes with & without annual leave required for cost comparison Expenses for personal vehicle travel that exceed one day will not be reimbursed – reimbursements limited to official travel only using most direct route
Rental Vehicles (policy #6.8)	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Rental vehicles should be reserved via Institute’s travel mgmt system Removed specific car rental names from policy Defined acronyms for insurance coverage (LDW, CDW, PAI, etc) Defined minimal ins coverage needed if contractual rental not available
Air Transportation (policy #6.6)	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Reinforcing use of “cost-effective” travel for air transportation Employees should use GT contracts w/air carriers for official business travel Clarity on when Business and First Class Air Travel is reimbursable for domestic and international flights - 10 hour or more rule removed Frequent Flyer programs should not influence flight selection
Ground Transportation: Mileage, Parking, Taxi & Rail (policy #6.6)	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Personal vehicle travel should not exceed cost of equivalent transportation Quote for travel required from travel management company
Lodging (policy #6.5)	Revision	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Daily Hotel Rates > \$500 require pre approval from PBS Clarity on when to use State of GA Hotel/Motel Tax Exemption Form
Meals & Incidental Travel Expenses (policy #6.4)	Revision/Clarification	Status will be reviewed with Institute Policy Manager next week	<ul style="list-style-type: none"> Formal agenda required for conferences, meetings & training Clarity on meal deductions when provided at conferences/meetings/training Links to State Accounting Office policy for in state meal per diems