Business Conflicts of Interest
Management Update

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Office of the General Counsel
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
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| General                                   |               | Memo sent to campus in early 2019           | • Received guidance from USG & State Attorney General’s Office  
• Operational funds can be used for:  
  • Airport Parking, Non-Cash Employee Achievement Awards up to $75, Professional Licenses, Certifications and Memberships  
  • Affiliate funding can be used for:  
  • 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  
• Document will be distributed to this group |
| Extra Compensation                        | Clarification | Are FAQ’s on website?                      | • FAQs recently issued from Provost’s Office  
• Will be distributed to this group |
| Wireless Communications Devices/Cellular Telephone Services | Revision      | White Paper will be developed               | • Proposed recommendations:  
  • 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 | • 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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| **Alcohol**                                | Revision            | Follow up with JulieAnne Williamson              | • On campus and Off campus **events** require prior approval  
• New form for off-campus activities  
  • 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                                 | • Clarity on the taxability of clothing items provided to an employee:  
  • 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            | • 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                                 | • Under review by USG Vice Chancellors  
• Clarity needed regarding when allowable  
  • 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 | • 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                                 | • 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 |
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<td>Procurement of Group Meals for Employees, Students, &amp; Official Visitors</td>
<td>Revision</td>
<td>Status will be reviewed with Institute Policy Manager next week</td>
<td>• Updated Business Entertainment Meals and Alcohol Purchases section to include the usage of Board Approved affiliated funding (GTRC, GTARC, etc.)</td>
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| Retreats & Campus Workshops for Faculty & Staff (policy #6.14)        | Revision/Clarification | Status will be reviewed with Institute Policy Manager next week | • 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 | • 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 | • 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 | • 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 | • Travel expense reimbursement & reconciliation should be submitted w/in 10 days  
• 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 |
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| Trips Which Include Annual Leave/Personal Travel (policy #6.10) | Revision/Clarification | Status will be reviewed with Institute Policy Manager next week        | • 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        | • 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        | • 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        | • 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        | • 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        | • 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 |