



Medical College of Georgia Foundation, Inc. Disbursement Policy

Effective April 2023



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Purpose

This policy ensures that disbursements made by the Medical College of Georgia Foundation (“Foundation”) to or on behalf of Augusta University or Augusta University Medical Center (collectively the “Institution”) are consistent with the principles of good stewardship, meeting the mission of the Foundation, as well as all applicable federal and state regulations required of the Foundation. It also ensures fair and equitable treatment of all employees and stakeholders by defining procedures and guidelines for expense reimbursement. The Foundation assumes that individuals will use their best judgment when incurring expenses in support of Augusta University and Foundation-related business.

Overview

The Foundation disburses funds as: 1) reimbursements to the Institution, 2) reimbursements to individuals for allowable expenses, and 3) direct payments to vendors for allowable expenses. In order to maintain control over disbursements, any request submitted that does not comply with the guidelines of this policy will not be reimbursed, unless accompanied by a valid exception signed by the Chief Executive Officer of the Foundation. All disbursements have the potential for review by external auditors.

All disbursements from the Foundation must: 1) provide a direct benefit to the Institution in furthering the organization’s mission; 2) be properly reported for tax purposes; 3) be made with regard to the fund purpose as set forth by the donor; and 4) adhere to the policies outlined herein.

When making disbursements, the Foundation considers:

- Conditions of the purpose of the fund providing the source(s) of funds;
- Governing state and federal statutes and regulations;
- The reasonable and equitable use of funds; and
- The manner in which persons of ordinary prudence would act in the management of the property of another.

The following guidelines govern all disbursements made from the Foundation:

- The Fund Administrator(s) is responsible for ensuring that there are sufficient monies in the applicable fund to cover requested disbursements. Requests from funds with insufficient available balances will not be approved.
- Individuals are prohibited from entering into a contract or charging expenses to an account in the name of the Medical College of Georgia Foundation, Inc.
- No expenditure – direct or indirect – may be made for political contributions, or to pay fines or penalties.
- The Foundation does not make disbursements based on estimates or quotes, but actual, allowable costs.
- The Foundation is required to pay sales tax for the purchase of tangible goods. When submitting invoices for direct payment to vendors, the individual submitting the check request is responsible for ensuring that sales tax has been appropriately included on the invoice.



Timeliness of Expenses

Check Requests must be submitted and received by MCGF within 90 days of the date that the expense was incurred based on the receipt or invoice date. Note that the check request must be both complete and accurate in order to be considered received by the Foundation. Expenses submitted outside of this window will not be approved for disbursement. The fact that an invoice was never received is not a valid excuse for untimely submission of check requests. It is the responsibility of the individual departments to ensure that they are appropriately billed for services rendered or products received.

Except in cases where a contract with a vendor explicitly states that payment must be made in full prior to the event or service, or a department has received approval from the Foundation, the Foundation does not disburse payments in advance of services being rendered. The Foundation reserves the right to approve or deny payment to a vendor in advance of services being performed on a case-by-case basis.

Responsibility

Department Managers

Department Managers should be familiar with the Disbursement Policy and inform their staff of the correct guidelines and procedures. They should be able to determine if expenses are necessary to achieve the goals of the Institution and Foundation and should only approve expenses in accordance with this policy.

Employees

Employees should exercise care in determining expenditures and should only incur expenses that are consistent with appropriate business needs. They are responsible for providing all required documentation and securing appropriate approvals before incurring expenses.

Disbursement Request Procedure

All requests for disbursement must be submitted to the Foundation using a Check Request Form and must include appropriate documentation of expenses and authorized approvals. Please note that effective the date of this policy, the Foundation's Check Request Form has been redesigned and the new form must be submitted with all disbursement requests going forward.

For reimbursement requests, multiple expenses can be documented on the same Check Request Form provided that they are clearly documented and itemized. When making purchases that will be submitted for reimbursement do not include personal (non-reimbursable) expenses in the same purchase transaction. Receipts submitted for reimbursement should only include items eligible for reimbursement.

Check requests should be complete and signed by two signatories before being submitted to the Foundation. Check Request Forms may be digitally signed via DocuSign by fund signatories as long as the DocuSign audit trail is provided to the Foundation along with the Check Request Form. In the event that the fund only has one authorized signatory, the dean of the applicable school must sign the form as the second signatory.



Alternatively, the department may choose to add additional signatories to the account using the [Fund Access Form](#) that is available upon request. Neither signatory can be the payee. In addition, a signatory cannot authorize an expense which personally benefits them. It is vital for signatories to understand that their signature serves as a certification of the accuracy and legitimacy of the expense.

A detailed description and justification of the expense should be included on the form. In the event that the form is incorrect, incomplete, or lacks sufficient documentation, the check request may be returned to the original preparer for correction and may delay payment.

Checks are disbursed by the Foundation every Friday for check requests received by Friday of the previous week. You may submit check requests via inter-campus mail (mail code FND-151), or hand deliver them to our office located at 720 St. Sebastian Way, Suite 150, Augusta, GA 30901 between the hours of 8am and 4pm, Monday through Friday. If you elect to pick up your check, please wait to do so until you are notified by foundation staff that it is available to be picked up.

Receipts and Invoices

The Foundation requires original invoices or receipts.

- Receipts and Invoices should be dated and have the vendor's name pre-printed on them.
- Receipts should be taped to a sheet of letter size paper and attached to the Check Request Form.
- Cash register total receipts, which do not detail the items purchased, will not be accepted.
- Catering invoices should break out the cost per head as well as the food items served.
- In order to issue a check to a vendor, MCGF requires original invoices and will not accept order forms, quotes, or confirmations.
- In the event that an original invoice or receipt cannot be located (and only a copy is provided), a memo signed by a fund signatory must be included with the check request packet certifying that the expense will not be reimbursed by any other source.
- Note that lost receipts can typically be duplicated by a vendor upon request.

Supplemental Forms

[Attachment A](#) – Required for purchases of meals, refreshments, or entertainment.

- Note that when an Attachment A is required, documentation should be included with the Check Request that supports the business purpose of the event and explains the benefit to the department and Institution.
- Appropriate documentation includes anything that substantiates the business purpose, including (but not limited to) a flyer, bulletin, agenda, brochure, meeting invitation, or course calendar.
- A screenshot of an Outlook work calendar appointment will not be accepted.
- The Attachment A form must be signed by an authorized signatory on the applicable fund; however, they cannot also be the payee of the check request.

[Attachment B](#) – Required for purchases of equipment greater than \$5,000.



- Assets purchased with Foundation funds must benefit the Institution and become Institution property when acquired.
- Due to the difficulty in controlling Institution assets, property and equipment must be delivered to an Institution address to be considered for reimbursement. Likewise, requests for repairs or maintenance of equipment not located at and billed to the Institution will not be paid.

Stop Payments

In the event of a lost check, fund representatives may request to have an outstanding check voided and reissued if it is within 90 days of the original check date. Any stop payment fees charged by the bank will be charged to the fund from which the check is cut. In the event that the fund does not have sufficient funds to absorb the stop payment fee, the reissued check will be reduced by the amount of the fee.

W-9 Forms

A completed [W-9 Form](#) is required to be submitted, per IRS guidelines, whenever compensation payments are made to an individual or a non-incorporated entity, such as a partnership or sole proprietorship. For example, all check requests for honorariums should include a W-9 Form as these payments are considered taxable income to the payee resulting in an issued 1099-NEC at the end of the year. The name or business listed on the W-9 Form must match the payee on the Check Request Form. Please note that a W-9 Form is not required for reimbursements to employees for business expenses.

Late Fees

The Foundation does not pay or reimburse for late fees or rush fees. Please plan far enough in advance to avoid such fees.

Sales Tax

The Foundation is not exempt from paying sales tax on purchases supporting the Institution. In order to avoid paying sales tax, the department should set up a Non-Sponsored Project with the Augusta University Business Office which is billed to the Foundation each month. For questions related to Non-Sponsored Projects, please contact the Augusta University Business Office at 706-737-1767 or business_office@augusta.edu.

Payments to Institution Employees for Services Rendered

The IRS considers payments to an employee for services to be W-2 taxable wages. As such, payments to employees should be processed by the Payroll Office so that applicable taxes can be withheld. The Foundation will subsequently reimburse the Institution for these expenses through a Non-Sponsored Project. Therefore, the Foundation does not pay employees directly for services rendered. Likewise, the Foundation cannot compensate students for work performed for the Institution.



Retired, Emeritus, & Adjunct Faculty

As with all other types of expenditures, payments to or for the benefit of retired/emeritus/adjunct faculty must have a documented business purpose that benefits the Institution. The fact that these persons are no longer on the active payroll does not exclude supporting their activities as long as the activities directly benefit the Institution, and such benefit is sufficiently documented.

Payments to retired, emeritus, or adjunct faculty, which are considered taxable and will be reported as non-employee compensation (on IRS Form 1099-NEC) or as employee compensation (on Form W-2), depending on the fact of each payment. If the payee is considered an independent contractor, a W-9 Form must be included with the check request. If payment is considered employee compensation, the request must be processed through the Augusta University Payroll Office.

Personal Loans

The Foundation does not provide personal loans to any individual for any reason.

Donations to other Non-Profits

The Foundation does not make donations to other institutionally related foundations or non-profit entities. However, in the event of a death of an Institution or Foundation employee or immediate family member, the Foundation will allow a one-time donation of up to \$75 to a non-profit in their memory. Note that immediate family member is defined as a spouse, child, or parent.

Gifts and Gift Cards

The Foundation, in general, does not pay for gifts to employees, volunteers, interns, visiting lecturers or guest speakers, students, etc. This includes, but is not limited to, gift baskets, wedding gifts, birthday gifts, thank-you gifts, and baby gifts. Gifts to celebrate national holidays such as Administrative Professional's Day or National Boss Day are likewise prohibited. Gifts in the form of gift cards/certificates in any dollar amount are considered a cash equivalent and will not be reimbursed by the Foundation. The following are the only gift exceptions:

- A retirement gift (for a true retirement, not simply a transition from one role or employer to another) of up to \$100.
- Sympathy or Get-Well flowers valued up to \$75 for the death or hospitalization of an immediate family member. In lieu of flowers, a donation of up to \$75 may be made to a charitable organization.

Awards to Employees

Awards to employees are considered employee compensation and must be included in the recipient's W-2 as taxable wages. In order to ensure proper tax reporting, cash awards must be processed through the payroll system of the applicable entity that employs the award recipient. The Foundation will reimburse the paying organization for the award amount plus any associated payroll taxes via a Non-Sponsored Project.



Students Awards

Under IRC Section 74, prizes and awards are includable in gross income. Academic awards must be paid through Financial Aid as such awards are taxable to the student recipient. If the student is also an employee (as is the case for research assistants), and the award is associated with the individual's employment position, the payment is considered compensation for services and must be processed through the Augusta University Payroll Office. The reason for the issuance of the award determines the appropriate tax reporting of the award.

Student Scholarships

The Foundation does not pay any students directly for scholarships. Instead, all scholarships must be processed through the Augusta University Financial Aid Office who in turn will be reimbursed by the Foundation.

Honorariums

Departments may use available departmental funds in accordance with the fund purpose to pay guest speakers and lecturers an honorarium following an event. Although the Foundation does not have a dollar limit for honorarium payments to guest speakers, Foundation staff retains the right to deny payment of honorariums they deem unreasonable given the facts of the circumstances. Honorariums may not be used as a means to reimburse guests for otherwise non-reimbursable expenses, such as first-class airfare or meals for the family members of the guest. Please note that due to tax implications, the Foundation cannot make payments to foreign individuals.

The following documentation is required to be included with the completed Check Request Form to be considered for payment:

- Written correspondence between the department and guest speaker that reflects both an invitation to an Institution sanctioned event and the amount of the honorarium. This correspondence must be dated and take place prior to the date of the event.
- A completed W-9 Form from the guest speaker
- A brochure/agenda/invitation/bulletin that advertises the event and highlights the guest speaker's role in the event.

Meals and Alcohol

Required Documentation: Check Request Form, Attachment A Form, Original Receipts with both the itemized copy and the summary copy that shows tip and signature, documentation that substantiates the business purpose of the event.

The Foundation will pay for meals and alcohol (along with applicable taxes and up to 20% in gratuity) when provided in conjunction with a business event. Such business events include staff meetings, retreats with a business purpose, allowable parties or receptions as described in this policy, meals with interview candidates, and meals with visiting lecturers. Meals will only be reimbursed for those necessary to the



meeting (i.e., meals may only be provided to interviewees and those conducting interviews, not including departmental administrative staff).

IRS rules allow for the payment of meals and alcohol as long as it is “ordinary and necessary” versus lavish and extravagant. If there is any doubt as to whether an expense is lavish or extravagant, please contact the Foundation accounting staff at 706-823-5503 for approval prior to the expense being made. The following dollar limits are placed on meals in conjunction with a business event (not including applicable taxes and 20% gratuity):

Breakfast:	\$15 per person
Lunch:	\$18 per person
Dinner:	\$75 per person; including \$25 of alcohol

When Institution employees accompany a guest (such as a guest speaker or interview candidate) to meals, there should be no more than a 4:1 ratio of Institution employees to guests. Note that, in the case of catered meals, the Foundation will monitor the number of meals ordered against the number of attendees. In the event where a department continuously submits check requests in which the number of meals ordered significantly exceeds the number of attendees at said event the Foundation will provide written communication of the issue to the fund representatives and request that the department implement an RSVP process.

Parties and Receptions

Required Documentation: Check Request Form, Attachment A Form, original receipts with both the itemized copy and the summary copy that shows tip and signature, documentation that substantiates the business purpose of the event.

All parties and receptions must follow IRS guidelines and minimize the appearance of being lavish or extravagant. In order to minimize any confusion about the definition of lavish or extravagant, the Foundation has set some practical guidelines to ensure event costs do not violate this rule. The Foundation will determine, at its sole discretion, whether expenses are considered “Lavish or Extravagant.” If an expense is deemed Lavish or Extravagant, the Foundation may deny payment in its entirety or reduce the amount paid.

In the event that a department wishes to invite more than the maximum number of attendees allowed, or they feel there is justification for a reimbursement which might be deemed Lavish, please provide the Foundation a detailed budget and justification for the expenses for approval prior to the event.

Events held at a personal residence must be approved by the Foundation at least 15 days in advance of the event date. An itemized budget should be submitted for review prior to approval being granted. The dollar limits outlined in the “Meals and Alcohol” section of this policy apply to events held at both public venues and in private residences.

The rules are as follows:



- Each guest of honor (i.e., retiree, graduate) may invite up to six personal guests such as family members, friends, or non-graduating peers
- In addition to the guest(s) of honor and their invitees, the department may invite a total of twenty attendees including their spouses. This limit is the same regardless of the number of guest of honors being recognized.

Example: If there are six residents in a graduating class, they may invite up to thirty-six friends, family members, or non-graduating peers. Additionally, the department may invite twenty additional guests between their faculty, administrative staff, and spouses. The total allowable number of attendees at this event is sixty-two.

Foundation monies may be used for the following purposes given their respective stipulations:

- Retirement of an Institution employee
 - Must be a bona fide retirement and not simply a transition to another role within or outside of the Institution
- Graduation from a program within the Institution
 - The Foundation will fund one graduation party per year, per cohort (i.e., student, resident, fellow).
 - The Foundation will only fund graduation parties at the completion of a program.
 - Celebrations of the completion of a school year or internships are not considered allowable for reimbursement
- New student orientation
 - The Foundation will fund one student orientation event per year, per cohort
- Departmental receptions at the conclusion of a visiting lecturer
- Interest group recruitment events in which the focus is to educate and attract students to specialized fields of medicine.

The following expenses related to parties and receptions are allowable for reimbursement:

- Food and beverages
- Plates, cups, cutlery, and napkins
- Table and linen rentals
- Table centerpieces
- Venue fees
- Security or fire marshal fees
- Bartender

The following expenses related to parties or receptions are not allowable for reimbursement:

- Entertainment services from a musician or DJ
- Rental of DJ equipment or lights
- Cleaning services or lawn maintenance for a personal residence

The following parties or receptions are not reimbursable by the Foundation:

- Holiday parties



- Birthday parties
- Employee or student morale events (except where a fund purpose explicitly allows such events, or proper justification has been provided and approved by the Foundation in advance)

Retreats

Reimbursement for faculty, fellow, resident and student retreats may be allowable given that they involve bona fide business or educational activities. Departments must present the Foundation a detailed budget proposal and agenda prior to any events held off campus to be considered for approval. The Foundation will pay for food and beverage, accommodations, and meeting spaces associated with a retreat. Reimbursement for spousal attendance or recreational activities during the retreat is not allowable. The foundation reserves the right to deny requests for events that it deems lavish, extravagant, or goes against institution policies.

Travel - Overview

All travel reimbursements will follow current state and Institution guidelines. Employee travel and the associated expenses will be authorized only in circumstances which are clearly consistent with the Augusta University Travel Office and Foundation's policies. It will be the responsibility of each department manager to ensure that all employee travel meets this objective, and that reimbursement is made only for reasonable business expenses in connection with authorized travel as defined in this document.

The Foundation's insurance does not provide coverage for reimbursable travel expenses incurred by Institution employees, including use of personal vehicles, rentals, airfare, etc. Institution employees are responsible for ensuring that they have appropriate coverage per Institution guidelines.

Transportation, meals, lodging and other travel costs for **non-business** guests are not reimbursable. Accommodations for personal guests (such as a child car seat) should be arranged and paid for by the employee.

If a trip is extended for personal reasons, expenses incurred for that portion of the trip are not reimbursable. This includes, but is not limited to vehicle rental, additional mileage or ground transportation fees, parking fees and tolls, hotel expenses and meals.

Travel - Transportation

The most cost-effective, safe, and efficient transportation is to be used.

Air Travel

Required Documentation: A copy of the fare confirmation receipt.

Travelers are expected to book coach class airfare unless a medical condition necessitates upgraded travel (physician's note and advanced authorization are required). If a traveler wishes to fly first class, but still be



reimbursed for the coach rate, they must first book a coach class airfare ticket and then use miles or personally pay for the upgrade to first class after the fact. The Foundation will not reimburse flights based on estimates of historical airfare costs or screenshots.

Travelers are responsible for managing their own frequent flyer accounts. Airline miles earned while traveling on official business are retained by the traveler. Frequent flyer miles or benefits are not reimbursable by the Foundation even if they are used on official business. Airline club memberships are not reimbursable by the Foundation.

Deliberately causing increased costs for the purpose of obtaining personal gratuities, such as denied boarding compensation, frequent flier points or mileage, or similar benefits is prohibited. Conversion of airline tickets for personal benefit, such as downgrading tickets, returning unused tickets for cash, credit, or personal airline tickets, or similar actions is also prohibited.

Airfare charges may include normal and customary baggage charges, such as one standard carry-on and one standard checked bag. Travelers will only be reimbursed for excessive baggage charges when: 1) traveling with heavy or bulk materials or equipment necessary for business; or 2) traveling for more than fourteen (14) days.

Auto Rental

Required Documentation: A copy of the rental agreement.

The type and size of rental vehicle should be appropriate for the number of travelers. Luxury vehicles are not allowable for reimbursement.

Use of Personal Vehicle

Required Documentation: A copy of Google maps reflecting the point of origin, destination, route, and total mileage.

When employees use a personal vehicle on approved business, the Foundation will reimburse mileage at the current rate of 65.5 cents per mile. The automobile mileage allowance assumes coverage of all transportation and operating costs including gas, oil, towing charges, repairs, auto insurance and damages. If the employee drives from his/her home directly to a business location that is not the employee's primary place of business, then the allowable miles are equal to the total actual miles driven minus the distance between the employee's residence and the employee's primary place of business.

Employees using a personal vehicle for approved business purposes do so at their own risk and should maintain their own personal insurance coverage.

Employees will not be reimbursed for vehicle repairs, rental car costs during the repair of a personal vehicle, tickets, fines, or traffic violations, damages to personal vehicles, or theft of personal vehicle and/or vehicle contents.



Other Transportation

Required Documentation: Original dated receipts

Use of other transportation services such as trains, subways, buses, taxis, Uber/Lyft, and shuttles is allowable, and receipts should be obtained. Gratuities for these services are reimbursable at cost; they should be reasonable and indicated on the receipt. The rental of luxury transportation services such as a limousine is not allowable for reimbursement.

Tolls and Parking

Required Documentation: Original dated receipts.

Tolls and parking paid while traveling on Institution or Foundation business are reimbursable expenses.

Travel - Meals

Meals will be reimbursed based on the category of person being reimbursed. Please refer to the guidelines set forth in the Travel Reimbursement section below.

Travel Reimbursement

Augusta University Campus Employees

The Foundation cannot directly reimburse campus employees or medical residents for business related travel expenses due to state open records reporting requirements. Departments must follow the below procedures in order to utilize Foundation funds to reimburse campus employees for business related travel:

1. Submit the employee's travel reimbursement to the Augusta University Travel Office
2. Submit a Non-Sponsored Project to the Augusta University Business Office for the total cost of travel
3. The Foundation will then reimburse the Institution via the monthly Non-Sponsored billing

For questions regarding an employee's status as either a Campus employee or AU Health employee, please reach out to the Augusta University Payroll Office at payroll_office@augusta.edu.

Augusta University Medical Center Employees

Required Documentation: Check Request Form, AU Travel Authorization Form, Original Hotel Receipts, Rental Car Agreement or Google Map of route to and from destination reflecting total miles driven

Augusta University Medical Center employees may be reimbursed directly for business related travel expenses via a completed Check Request Form if they are not also on the payroll of Augusta University Campus. Please include an Augusta University Travel Authorization Form (which includes a log showing the date, point of origin, destination, and miles driven) with the completed check request.



The following expenses are allowable for reimbursement:

- Airfare to and from the event
- Lodging
 - If the traveler stays on the same premises as the conference being held, or books their hotel through the conference registration, the Foundation will reimburse the full amount of the stay.
 - If the traveler elects to stay at a hotel of their choice off site from the conference, the Foundation will reimburse up to the daily U.S. General Services Administration per diem rate for lodging.
 - <https://www.gsa.gov/travel/plan-book/per-diem-rates>
- Meals
 - Based on actual expenses incurred, up to the U.S. General Services Administration per diem rate for meals.
 - <https://www.gsa.gov/travel/plan-book/per-diem-rates>
 - Original, itemized receipts must be provided to be considered for reimbursement
- Transportation
 - Mileage for use of POV at 65.5 cents per mile
 - Rental car for use at the destination of the event
 - Taxi/Lyft/Uber services to and from the airport, hotel, and location of event

The following expenses are not allowable for reimbursement:

- First class airfare
- Luxury vehicle rentals including limousines
- Meals for spouse or family members accompanying employee on travel
- Expenses incurred for personal travel prior to or following the dates of the event

Guests

Required Documentation: Check Request Form, Airfare Receipt, Original Hotel Receipts, Car Agreement or Google Map of route to and from destination reflecting total miles driven, Original/Itemized receipts for Meals and Transportation

The Foundation will reimburse guest speakers, lecturers, and interview candidates for actual expenses incurred while traveling to and from the event they are participating in. Original and itemized receipts are required to be turned in to the Foundation with the Check Request Form to be considered for reimbursement; a flat per diem rate will not be paid to guests.

The following expenses are allowable for reimbursement:

- Airfare to and from the event
- Lodging
- Meals
 - Based on actual expenses incurred, before taxes and 20% gratuity
 - Breakfast: \$15 per day
 - Lunch: \$18 per day



- Dinner: \$75 per day; including \$25 of alcohol
 - Original, itemized receipts must be provided to be considered for reimbursement
- Transportation
 - Mileage for use of POV at 65.5 cents per mile
 - Rental car for use at the destination of the event
 - Taxi/Lyft/Uber services to and from the airport, hotel, and location of event

The following expenses are not allowable for reimbursement:

- First class airfare
- Luxury vehicle rentals including limousines
- Meals for spouse or family members accompanying guest on travel
- Expenses incurred for personal travel prior to or following the dates of the event

Endowed Chairs

If a vacant chair is seated mid-year, the newly seated chair holder will receive a pro-rated percentage of the annual distribution. Chair fund budgets are determined by the Dean's Office of the Medical College of Georgia and all budgetary inquiries must be directed to them.

The Foundation recognizes that in exceptional cases, continued funding may be needed to support an endowed chair vacated by a departing or retiring chair holder. The Dean of the Medical College of Georgia or Augusta University Vice President for Research may request, in writing, an extension of funding for a limited time during such a transition. The Foundation Board of Directors will consider these requests on a case-by-case basis.

Miscellaneous

The Foundation does not reimburse Institution employees for the cost of cell phones or cell phone usage. The Foundation will pay for lab coat laundering as well as departmental drinks and paper supplies (i.e., cups, napkins, plates, etc.)

Contact Us

Please contact the Foundation at 706-823-5500 or info@mcgfoundation.org for any questions related to this policy.