

MGIC Policies and Procedures – Administration and Operations

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Definitions

Acquisition cost: The total cost of acquiring an asset that includes the asset cost itself, as well as taxes, shipping, set-up costs, discounts, and operating system software, memory, or other additions listed on the asset invoice that are integral to the equipment.

Allowable cost: A cost that is necessary and reasonable for the intended use and allocable to that award/project.

Capital asset: see **Equipment**

Communications point person: The staff member designated to ensure the country office translates relevant MGIC Policy into local policies and procedures and adheres to MGIC and UMB communications standards and sponsor requirements.

Confidential information: Non-public, proprietary, or sensitive information including processes, formulas, data, know-how, inventions, improvements, techniques, plans, strategies, forecasts, proposals, personal information, and health information (see **Sensitive data**).

Country director (CD): The lead manager of a country office. The CD position directly supervises senior management positions in an MGIC country office and reports to the designee of the MGIC President. In non-traditional MGIC structures (such as MGIC USA, small teams or embedded positions), the CD role is referred to as a Country Representative (CR).

Country office (CO): An MGIC branch office, corporate affiliate, field office, or program office established in a physical facility outside the United States, to conduct business in a country where UMB's research, education, and related programs are implemented.

Country representative (CR): The senior-most representative of MGIC based in a country or representing MGIC in that country remotely, as designated by the MGIC President. In countries where MGIC operates a full country office, the senior-most MGIC representative is the Country director (CD). In countries where MGIC is not legally registered, does not have a full country office, or has another operating model (e.g., embedded within a partner institution), the MGIC Country Representative role may be held by the AVP of International Operations, an MGIC consultant or employee hired through the MGIC under an Employer of Record (EOR) contract, or another position as designated by the MGIC President.

Designated non-capital asset (DNCA): An asset valued at less than US\$500 that merits additional stewardship because such assets are desirable, easily converted to personal use, and susceptible to theft.

Director of finance and administration (DFA): The lead manager of the MGIC financial and accounting functions for an office or team, who may oversee and direct the office's administrative/operational functions as well, and whose title might be Director of Finance and Administration, Head of Finance, International Finance & Procurement Manager, or some other title indicating their leadership role in MGIC financial management.

Duty station: An employee's assigned place of work as documented in the employment agreement or as amended in writing.

Employer of Record (EOR): A professional employment firm that takes on the role of managing payroll, benefits, and risk management for a company's employees on its behalf, relieving the company of these responsibilities.

Equipment: Any item that (1) is durable with an expected service life of one or more years; (2) has an acquisition cost (purchase value) of US\$5,000 or more; and (3) is complete in itself and does not lose its identity or become a component part of another article when put into use.

Field sub-office: Any office besides the country office's main office, typically located in a region of the country where MGIC has significant program operations, sometimes referred to as a regional office.

Fraud: Wrongful or criminal deception that is intended to result in financial or personal gain or to deprive a victim of a legal right. Fraud can violate civil law or criminal law, or it may cause no loss of money, property, or legal right but still be an element of another civil or criminal wrong.

Harassment: Unwelcome conduct that is based on gender, marital status, pregnancy, race, ethnicity, tribe, color, religion, age, ancestry, national origin, sex, gender identity or expression, sexual orientation, or physical or mental disability, and that interferes with an individual's work performance or creates an intimidating, hostile, humiliating, demeaning, or sexually offensive working environment.

Human resources (HR) lead: The lead specialist in an MGIC office with responsibilities related to human resources management, which could in some cases be the DFA or a project manager.

Independent contractor: An individual or firm engaged to provide services specified in an agreement that includes a clear description of the activities, services, reports, and deliverables to be provided, also may be referred to as a *consultant*.

Intellectual property: A work or invention that is a product of the human intellect, to which one has ownership rights, copyrights, patents, patent applications, trade secrecy rights, trademarks, service marks, trade names, know-how, data, technology, or other rights.

Main office: The country office's primary office, typically in the capital city and where the leadership sits.

MGIC Office: A unit, team, or designated representative within MGIC who maintain a physical presence in a country (such as a Country Office) or operate remotely when there is no physical office in country (such as MGIC USA).

MGIC Office Leadership: The CD or designated Country Representative, director of finance and administration (DFA), and other senior managers whom the CD supervises and who are collectively accountable for office or team management, operations, and programs.

MGIC Personnel: Individuals engaged under MGIC Employment Contracts or by a third-party Employer of Record (EOR) retained by MGIC. MGIC Personnel may live and work in a country regardless of whether MGIC has an established country office or not.

MGIC technical lead: The MGIC project manager who leads programmatic and research activity for a specific project.

MGIC USA: The operational structure of MGIC procedures and services provided to UMB Funding Units outside of an MGIC country office. MGIC USA's services include procurement, financial transactions, recruitment and employment, and facilitation of legal services in countries where MGIC is not registered or operational. MGIC USA is an MGIC Office and is subject to the MGIC policies and procedures.

Non-capital asset (NCA): Physical assets with an acquisition cost of US\$500 or more, but less than US\$5,000 per unit, and with a useful life of greater than one year.

Payment Authorization Agreement (PAA): An agreement instrument that establishes the terms under which sponsor or lightly restricted project funds that are disbursed from UMB to its affiliate must be used for direct implementation of UMB's research and programs through the affiliate.

Personally identifiable information (PII): Data that could potentially identify a specific individual, such as full name, date of birth, government ID number, and passport number.

Property lead: The staff member designated to oversee CO property management and ensure MGIC property management standards and procedures are met.

Property management: Management of equipment, which is also referred to as *personal property* and includes IT systems and excludes land and other *real property*.

Real property: Land, including land improvements, structures and appurtenances thereto, exclusive of moveable machinery and equipment.

Records: Any documentary material made or received in connection with CO activity, including paper records, electronic records, and records, reports, or data in other media.

Refitting contract: A type of subaward that provides a subcontractor with resources to construct or refit existing facilities, carried out as part of a project, and subject to specific sponsor restrictions.

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Research data: Information which is recorded or collected (regardless of the form or media), and which is commonly accepted in the scientific community as necessary to reconstruct, validate, and evaluate reported or otherwise published results.

Sensitive data: Any personal, confidential, and legally protected information, including personally identifiable information (PII) associated with patient and study participant data.

Social media manager: The person in a country office who manages use of social media in support of MGIC and UMB technical and public relations goals.

Sponsor: A funder of a sponsored project; an awarding agency or institutional donor; a funding source; an institution that funds activity that is separately budgeted and accounted for according to the terms the institution lays out in an award agreement.

Sponsored project: A project funded by a sponsor (as opposed to those funded by UMB lightly restricted funds).

Subrecipient: A legal entity to which an award recipient makes a subaward to carry out part of a sponsor-funded project, and which is accountable to the award recipient for the use of the funds provided, and also referred to as a *subawardee*.

Travel status: Travel away from the duty station at a distance of at least 100 kilometers for a period of 12 hours or more (unless local law dictates a different distance and/or time).

Traveler: An employee traveling on MGIC business whose travel expenses may be reimbursed from funds managed by the country office.

UMB Central Administration: The offices and departments of UMB that oversee university-wide systems, policies, procedures, and standards. These offices are designated by the MGIC Board to support the governance, compliance, and administration of MGIC. They include, among others, International Operations, Sponsored Program Administration, Sponsored Program Accounting and Compliance, Human Resources, the Office of the Controller, the Office of Accountability and Compliance, and the Office of Legal Counsel.

UMB department administrator: The person in a UMB Funding Unit who typically serves as chief financial and operating officer for the UMB unit and is responsible for the planning and execution of compliance, financial, personnel, and other administrative affairs for the department's programs. When multiple UMB Funding Units engage the same MGIC office, the MGIC President designates one individual to serve as the UMB department administrator for that MGIC office's approvals and oversight purposes.

UMB department communications lead: The person in a UMB department, institute, or center (unit) who supports the country offices in translating relevant MGIC Policy into local communications policies and procedures and in adhering to MGIC and UMB communications standards and sponsor requirements.

UMB department operations lead: The person in a UMB Funding Unit with responsibilities related to program operations, human resources management, and administration. When multiple UMB Funding Units engage the same MGIC office, the MGIC President designates one individual to serve as the UMB department operations lead for that MGIC office's approvals and oversight purposes.

UMB department program lead: The person in a UMB Funding Unit who directs the program. This role is often performed by the Principal Investigator or equivalent program director named in UMB's award agreement. This role may directly supervise MGIC technical leads in collaboration with the CD/CR.

UMB Funding Unit: A UMB school, department, institute, center, or other structure that manages international program awards and engages and funds MGIC to implement those programs.

UMB lightly restricted or unrestricted funds: UMB private funds (versus award funds) that are provided to MGIC with minimal spending restrictions indicated; sometimes referred to as "discretionary funds."

3-1 Overview of MGIC Policies and Procedures for Administration and Operations

Organization of the policies and procedures for administration and operations

This portion of Maryland Global Initiatives Corporation (MGIC) Policies and Procedures covers a range of administrative and operational functions not addressed in other policies and procedures, including requirements and guidance specific to establishing, transitioning, and closing field operations. It includes direction on legal affairs, facilities management, insurance, property management, travel, fleet management, communications, confidentiality and data security, and record retention.

About “Designees”

MGIC Policies and Procedures assign authorities and responsibilities to certain leadership positions. However, directors and managers may designate or delegate those authorities and responsibilities to colleagues, unless otherwise indicated and in accordance with the [5-4 Signature Authorities](#) and with appropriate internal controls in place.

While the majority of topics in the MGIC Policies and Procedures for Administration and Operations are most relevant for full country offices outside the U.S., instruction and guidance are also provided when applicable to the remote operations of MGIC USA, as well as in MGIC country offices that are implementing programs under more than one UMB Funding Unit.

These policies and procedures direct and guide MGIC operational and administrative activity, providing the necessary tools for efficient management of resources and effective support to delivery of research and programs. They align with relevant policies of the University of Maryland, Baltimore (UMB), of which MGIC is an affiliate, and reflect applicable laws and regulations of the United States government (USG).

Many of these administrative policies and procedures are closely related to those in [5-Financial Affairs](#), for example:

- [5-3 Internal Controls](#)
- [5-4 Signature Authorities](#)
- [5-12 Payment of Expenses](#)
- [5-13 Advances](#)
- [5-15 Procurement](#)

Administrative duties related to award and subaward management are covered in [6-Award and Subaward Management](#).

Administration-related forms

MGIC Administration and Operations Policies and Procedures references many standardized forms and formats, as well as samples. These are available in the [MGIC Forms Library](#) in editable formats to facilitate adaptation of the forms to specific needs. Such adaptations will range from adding the MGIC office’s name and address to including an additional signatory. **Where MGIC has provided the office with access to an electronic form (eForm) through web or mobile applications, the office should use the eForm and not the Word or Excel version provided in the [MGIC Forms Library](#).**

Operations-Related Table of Authorities

Each MGIC office should have not only a [Table of Operations-Related Authorities](#) for finance-related operations, but also one for other operations such as those covered in these Administration and Operations Policies and Procedures. See [5-4 Signature Authorities](#) for information on developing, seeking approval for, and updating Tables of Authorities.

MGIC administration and operations responsibilities

Administrative and operations duties are typically shared among multiple MGIC personnel (hereafter referred to simply as “personnel”) and are overseen by and the primary responsibility of the director of finance and administration (DFA) or another appointed administrative lead. Unless otherwise delegated by the Country Director (CD) or Country Representative (CR), the DFA must ensure the office fulfills these duties, including:

- ☐ Keep the [Table of Operations-Related Authorities](#) up-to-date and readily available to personnel
- ☐ If needing to make any deviation from or **exception** to MGIC Policies and Procedures, obtain prior UMB approval, unless otherwise specified
- ☐ If contemplating **opening or closing** an MGIC office or field sub-office, collaborate closely with UMB to develop a plan well in advance of initiating activities
- ☐ Obtain UMB permission prior to entering into a **lease** for a new office or field sub-office
- ☐ Engage MGIC-contracted **local legal counsel** in reviewing contracts, leases, and other binding documents and assisting with registrations, memoranda of understanding (MOUs), and other legal arrangements
- ☐ Develop and maintain a body of office-specific **policies and procedures** in complementary documents: Human Resources (HR) Handbook, and Country or Program Safety and Security Plan
- ☐ Compel all personnel to complete an [Incident Report Form](#) for any **incident** affecting the safety and security of people and/or property
- ☐ Carry all the forms of **insurance** coverage required by MGIC/UMB, local law, and sponsor terms and conditions
- ☐ Create from the start and maintain standards and procedures for **property management**, from receiving assets to tagging, assigning, tracking, and using and disposing of them properly
- ☐ Ensure all travelers obtain prior **travel** authorization and close out travel advances within the required time period
- ☐ Ensure MGIC **vehicles** are used only for business purposes, are driven only by authorized MGIC employees, and transport only authorized passengers
- ☐ Follow MGIC **communications** guidelines, including those related to logos, branding, social media, and use of people’s images
- ☐ Maintain the required hard-copy and electronic **filing systems**, following MGIC Policies on **confidentiality and data security** and on **record retention**

MGIC offices with portfolios funded by more than one UMB Funding Unit

MGIC offices may at times implement programs under PAAs funded by more than one UMB Funding Unit, and may be requested to facilitate international activities by UMB Funding Units when the funding source and nature of support do not warrant a PAA. In such cases, personnel will find themselves servicing multiple UMB “clients” with varying award requirements, program budgets,

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internal management processes, and expectations of MGIC. At an institutional level the MGIC Board of Directors is responsible to ensure effective coordination and coherence in how UMB's schools engage MGIC and may be called upon to broker or resolve differences that increase organizational risk. At an operational level, the CD or CR is responsible to uphold MGIC policies and procedures while maintaining effective partnerships with the relevant UMB leads of each program in the office's award portfolio. This responsibility calls for exceptional relationship management, negotiation and problem-solving, and organizational administration skills to ensure UMB's programs, financial resources, and sponsor awards are managed at consistently high standards and in compliance with diverse funder requirements.

When necessary to facilitate sound oversight and efficient decision-making when more than one Funding Unit is implementing programs through the same MGIC office, the MGIC President will designate a UMB employee to fill the roles of UMB Department Administrator and UMB Department Operations Lead for purposes of fulfilling the responsibilities described in these policies and procedures. The MGIC President will also designate a UMB employee to directly supervise the CD or CR in the case of multiple UMB Funding Units implementing programs through the same office.

MGIC offices with diverse program portfolios must establish internal procedures for communicating with multiple UMB Funding Unit leads, making administrative and operational decisions that impact multiple program budgets and sponsor award requirements, and obtaining and documenting approvals from multiple UMB authorities.

Importantly, MGIC must document and apply fair and reasonable cost allocation methodologies that assign shared costs to each project in proportion to the benefit received and must carefully manage accounting and reporting to ensure allowability. The CD/CR or equivalent leadership position is fully accountable for the MGIC office processes and procedures that ensure compliance with this policy.

Exceptions and exceptions request process

Exceptions to policies and procedures may be warranted when in the course of operations, a situation or scenario arises that does not fall within the prescribed standards. These policies and procedures specify in certain cases what action an office should take to seek approval for an exception to a policy requirement, such as exceptions related to international travel or when an office is seeking an exemption from any required insurance coverage.

Where not specified, a CD/CR may seek an exception to an MGIC Policy by submitting a completed [Policy Exception Request Form](#) to the UMB department operations lead. The request should specify the following:

- The MGIC Policy for which an exception is being requested
- The nature of non-compliance or deviation from the policy
- Why an exception is required
- How the country office will minimize any potential risk associated with deviating from the policy
- Additional information, as needed to support the request

It is the MGIC office's responsibility to submit requests in advance to allow sufficient time for the approval process. The designated UMB department operations lead will review and approve exceptions on a case-by-case basis, seek other UMB approvals if needed, and communicate the results of the exception request.

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The office is required to attach approved exception requests as supporting documentation for applicable transactions or related actions.

Checklist for CDs/CRs

A tool for managing policy implementation and conducting compliance monitoring

- ☐ Ensure the leadership team understands their core responsibilities with respect to their administration and operations duties
- ☐ Make it clear that deviations from or exceptions to MGIC Policies and Procedures require prior HO approval, unless otherwise specified
- ☐ If seeking a policy exception, submit to the UMB department operations lead a completed [Policy Exception Request Form](#), allowing sufficient time for the approval process

Key references

- [Incident Report Form](#)
- [Policy Exception Request Form](#)
- [Table of Operations-Related Authorities](#)
- [5-Financial Affairs](#)
- [5-3 Internal Controls](#)
- [5-4 Signature Authorities](#)
- [5-12 Payment of Expenses](#)
- [5-13 Advances](#)
- [5-15 Procurement](#)
- [6-Award and Subaward Management](#)

3-2 Establishing Country Office Operations

MGIC Policy as relates to new MGIC offices may be found in [1-5 Establishing and Operating Through Affiliates \(Country Offices\)](#). Following are procedures for establishing day-to-day operations in countries where MGIC has opened a physical country office.

Establishment of day-to-day operations

Following approval of a new country office and registration in that country, the designated start-up team commences a multitude of tasks to establish MGIC's presence, with top priority given to hiring personnel and arranging local legal services, in-country registration, and banking services. See [3-3 Legal Affairs](#), [4-6 Recruitment](#), [4-7 Hiring](#), and [5-11 Bank Accounts](#).

MGIC and UMB may flex specific start-up procedures as appropriate to the scope, expected duration, and structure of the operation. For example, the process of standing up a small team, other non-traditional country presence, or a new field sub-office may require less procedural infrastructure than a full country office. With these considerations in mind, the following topics should be considered for new start-ups:

1. [1-Corporate Governance](#): Ensuring legal and regulatory compliance during start-up and thereafter; proposing and establishing new country offices

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2. [2-Ethics and Conduct](#): Establishing a work environment where MGIC values are upheld and where illegal and unethical behavior, harassment, and discrimination are not tolerated; ensuring all personnel are familiar with mechanisms for reporting known or suspected violations of the MGIC Code of Ethics and Professional Conduct
3. [Legal affairs](#): Identifying local legal counsel, establishing a legal presence and MOUs, adhering to local labor law
4. [Field office policies and procedures](#): Establishing operating procedures, including for:
 - Use of office supplies and equipment, including mobile phones, email, and internet
 - [Property management](#)
 - [Travel](#)
 - [Vehicle use and fleet management](#)
 - [Photo/video consent guidelines](#)
 - [Confidentiality and data security](#)
 - [Record retention and access](#)
5. [4-Human Resources](#): Establishing a management structure, organizational structure including the CO leadership team, position grading, salary scale, and benefits; setting up recruitment, hiring, orientation, performance objectives and plans, personnel files
6. [5-Financial Affairs](#): Creating internal controls, financial management systems and processes, petty cash procedures, and procurement standard operating procedures
7. [6-Award and Subaward Management](#): Entering into partner agreements, complying with sponsor requirements, establishing procedures for subrecipient management
8. [7-Information Technology](#): Implementing hardware and software standards, setting up IT security measures, establishing IT accounts
9. [8-Safety and Security](#): Setting up incident reporting and management procedures and implementing safety and security measures related to cash, facilities, transportation, etc.

Checklist for CDs

- ☐ If leading the establishment of a new MGIC office, seek requisite HO approvals according to this Policy, and put in place contextually relevant policies and procedures, guided by MGIC Policies and Procedures
- ☐ If proposing to open a new field sub-office, seek prior approval from the UMB department program lead
- ☐ When opening a field sub-office, establish the full range of CO operational policies and procedures as quickly as possible

Key references

- [1-Corporate Governance](#)
- [1-5 Establishing and Operating Through Affiliates \(Country Offices\)](#)
- [1-6 Establishing Unaffiliated Local Organizations](#)
- [2-Ethics and Conduct](#)
- [3-3 Legal Affairs](#)
- [3-7 Property Management](#)
- [3-8 Travel](#)
- [3-9 Vehicle Use and Fleet Management](#)
- [3-10 Communications](#)
- [3-11 Confidentiality and Data Security](#)
- [3-12 Record Retention and Access](#)

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- [4-Human Resources](#)
- [4-6 Recruitment](#)
- [4-7 Hiring](#)
- [5-Financial Affairs](#)
- [5-11 Bank Accounts](#)
- [6-Award and Subaward Management](#)
- [7-Information Technology](#)
- [8-Safety and Security](#)

3-3 Legal Affairs

Policy statement

Registration in a new country or changing a country registration status requires MGIC Board of Directors' approval, regardless of the organizational structure to be implemented.

MGIC offices should investigate which forms of **tax exemption** are available given MGIC's registration status, the availability of sponsor tax exemptions, and the applicability of any tax treaties, and pursue those that apply. This includes, but is not limited to, exemption from value-added tax (VAT), sales tax, customs duties, property tax, and income tax on non-citizen personnel under double-taxation treaties.

UMB in collaboration with the MGIC office may wish to establish **memoranda of understanding** with government entities such as the Ministry of Health to achieve program goals and/or as required to obtain tax exemptions. Pursuit of an MOU should be a collaborative process between the MGIC office and the UMB department program lead, and the latter will bring the UMB Office of Research and Development (ORD) into the discussion and seek UMB approval. MGIC offices are not permitted to directly engage in any MOU with any entity, including government entities. Any exception requires written approval of the MGIC President.

MGIC offices are required to have **local legal counsel** on retainer in order to review contracts, leases, and other binding documents and to assist with corporate registrations, statutory filings, and other legal arrangements.

In countries where MGIC is not registered and/or does not have long-term personnel or physical assets, UMB's International Operations (IO) department may directly engage local legal services as necessary for business dormancy, risk management, and compliance with laws affecting remote or outsourced program delivery.

The MGIC President holds the sole authority to approve an MGIC office's engagement of **local legal counsel** and to approve any substantive change in the arrangements with that counsel.

Registration and reporting requirements

In examining options for establishing a legal presence in a new country, MGIC seeks a form of in-country registration that reduces financial and reputational risks while enabling operations and minimizing administrative burdens. Generally, the preferred option is to register MGIC as a branch in the foreign country and not to create an MGIC affiliate or other new business entity. This is evaluated country by country with local legal advice.

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The CD/CR is responsible for fulfilling requirements associated with MGIC's legal status in that country, including ensuring government registrations are renewed and kept current as required by local law, submitting statutory filings, and ensuring the country office pays applicable taxes and fees. The office retains copies of such submissions on file and sends a copy to the UMB International Operations department for retention in MGIC corporate files.

Management of local legal counsel

Close collaboration between the MGIC office and UMB's department of International Operations (IO), on behalf of the MGIC Board, is required during the process of identifying, vetting, and selecting a legal services contractor, with conformance to [5-15 Procurement](#) throughout.

While the engagement of legal counsel is undertaken by the MGIC President, the MGIC office typically leads in finding and obtaining references for legal counsel that has experience assisting international non-governmental organizations (INGOs) or institutes of higher education in seeking to register and operate in the country. The office also manages the relationship with the chosen counsel and compliance with the engagement contract terms. The IO department and the UMB operations lead may interact directly with local legal counsel to obtain their services for specific needs such as policy reviews, contract development, or guidance on handling personnel issues.

In countries where MGIC does not have a country office, the IO Department manages the relationship with local legal counsel on behalf of MGIC, and engages the UMB Funding Unit(s) involved in program implementation in that country accordingly. IO also facilitates communication and coordination between local legal services and UMB's legal office and Office of Accountability and Compliance, regardless of MGIC's structure in country, when needed to address an ethics compliance or legal case (see also [2 – Ethics and Conduct](#)).

If issues arise with unsatisfactory performance of legal counsel, the CD or CR should document these and consult with the UMB department operations lead on how to address the situation. If for this or any other reason the office would like to change or add another legal services contractor, the CD/CR consults the department operations lead and notifies the MGIC VP – Policy and Administration of intention to procure new legal counsel.

Management of potential or actual litigation

CDs must immediately notify the UMB department program lead and the MGIC VP- Policy & Administration of **any potential or actual litigation or legal claims against MGIC and/or UMB**. This includes violations of the [MGIC Code of Ethics and Professional Conduct](#) (the Code, found in [2-Ethics and Conduct](#)) in the form of criminal offenses, suspected or known fraud, sexual misconduct, or other serious offenses that could potentially result in litigation.

Personnel should be aware that **if an individual employee or an MGIC office** receives a legal summons, claim, complaint, notice of lawsuit, or other written notice related to an MGIC or UMB matter, this is considered a very serious matter and the employee receiving the notice must report it to the CD/CR immediately. The overall guidance is to report any potential or actual litigation, no matter how insignificant it may appear.

MGIC should not take any action without first reporting to and consulting with the UMB department program lead and MGIC VP – Policy & Administration. This applies even in the case of a legal inquiry.

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Research data, intellectual property, and copyright

Employees are obligated to assign to UMB any inventions, copyrighted works, and other intellectual property made within the scope of employment. MGIC offices are responsible for advising employees of this obligation.

Research data that results from research activity performed under the auspices of UMB must be properly managed to maintain scientific integrity and comply with requirements of MGIC and UMB and the terms and conditions of sponsor awards. While MGIC personnel implement research on behalf of UMB, UMB retains ownership of the data that is gathered unless UMB has assigned ownership to a sponsor.

If an individual leaving MGIC employment requests to take copies of research data that the individual helped create, the office must refer the matter to the UMB department program lead for approval.

Any and all **intellectual property** licensed to, owned by, or controlled by UMB or MGIC is the sole property of UMB. Intellectual property conceived, created, or developed by any UMB or MGIC personnel under a Payment Authorization Agreement (PAA) is owned by UMB or, if UMB has assigned ownership to a sponsor, is owned by that sponsor. Intellectual property includes all data, documents, information, copyrights, patents, trademarks, trade secrets, or other proprietary rights in and to the work.

MGIC offices must promptly and fully report to the UMB department program lead any invention created in undertaking the work. Any question about individuals' intellectual property rights when leaving MGIC employment, or at any time, should be referred to the UMB department program lead.

Copyright must be respected. In general, copyrighted materials for use in programs may be reproduced in whole or in part with the consent of the person or entity who owns the copyright. Limited reproduction of copyrighted materials without the permission of the author of the material is permitted provided that attribution is given. Proper attribution in the reproduction involves both recognizing the original authorship of the copyrighted material and noting the fact that the material is copyrighted.

Personnel are required to avoid **conflicts of interest** or apparent conflicts of interest between their obligations to MGIC and their personal affairs. Personnel must promptly and fully disclose any potential or actual conflicts of interest related to research data, intellectual property, and copyright. As per [2-3 MGIC Conflict of Interest Policy](#), reports must be made as soon as possible to the DFA or other manager or through the [Ethics Hotline](#).

In addition, conflicts of interest that may compromise the objectivity and integrity of research and other academic activity must be reported to the UMB department program lead and MGIC President and/or through the [Ethics Hotline](#).

Other legal concerns

Other MGIC Policies related to legal affairs may be found in [1-3 Legal and Regulatory Compliance](#), including regarding employee responsibilities for compliance with local laws and U.S. laws and regulations. See also [6-Award and Subaward Management](#) regarding requirements associated with

UMB projects supported by awards, which are by definition legal instruments that provide financial assistance to a recipient to carry out a project.

Checklist for CDs/CRs

- ☐ Investigate which forms of tax exemption are available and pursue those that apply
- ☐ Work collaboratively with the UMB department program lead on MOUs
- ☐ Coordinate closely with the head office during the process of selecting legal services contractors
- ☐ Have local legal counsel review contracts, leases, and other binding documents and assist with registrations, litigation, and other legal matters
- ☐ Immediately notify the UMB department program lead and MGIC VP – Policy & Administration of any potential or actual litigation or legal claims against MGIC and/or UMB
- ☐ Ensure statutory requirements associated with MGIC’s registration status are fulfilled in a timely manner
- ☐ In the event that an MGIC office or an individual employee receives a legal summons, claim, complaint, notice of a lawsuit, other written notice or even a legal inquiry, do not take any action without first reporting to and consulting with the UMB department program lead and MGIC VP - Policy & Administration.
- ☐ Advise employees that they are obligated to assign to UMB any inventions, copyrighted works, and other intellectual property made within the scope of employment
- ☐ Promptly and fully report to the UMB department program lead any and all inventions created in implementing programming and research
- ☐ Ensure the country office respects copyright and attributes copyrighted materials properly

Key references

- [1-3 Policy Concerning Legal and Regulatory Compliance](#)
- [2-2 MGIC Code of Ethics and Professional Conduct](#)
- [2-3 MGIC Conflict of Interest Policy](#)
- [5-15 Procurement](#)
- [6-Award and Subaward Management](#)
- [Ethics Hotline \(https://www.umaryland.edu/mgic/ethics-hotline/\)](https://www.umaryland.edu/mgic/ethics-hotline/)

3-4 Facilities Management for MGIC Country Offices

Policy statement

MGIC country offices typically have a **main office** situated in the capital city and can have one or more **field sub-offices** located in regions of the country where MGIC has significant program operations. The sub-offices are sometimes referred to as *regional offices*, and their number and location may change over time with the completion of some projects and addition of new ones.

The authority to open a country office, and thus to set up a main office, resides with the MGIC Board of Directors. The authority to open a sub-office rests with the UMB department administrator. See [3-2 Establishing Operations](#) for details.

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Space lease contracts may have various titles, including lease, occupancy agreement, tenancy agreement, license, rental agreement, use agreement, and memorandum of understanding. Regardless of how presented, all must be reviewed by local legal counsel. Furthermore, MGIC personnel are not authorized to execute any contract for space leases. This applies not only to offices, but also to warehouses, laboratories, and other facilities that may be required for program implementation.

In certain circumstances, the authority to sign a space lease contract may be delegated by the MGIC President to the CD/CR, in accordance with the terms of the delegated signature authority.

These authorities apply not only to original contracts, but also to amendments and modifications to those contracts.

Personnel are not authorized to execute any contract for purchase or new construction of spaces. Projects that involve refitting facilities with MGIC support are subject to specific sponsor restrictions – see [6-5 Subaward Implementation](#).

See [5-4 Signature Authorities](#) and [5-15 Procurement](#) for additional information about authorities and contracts.

Review and approval of space lease contracts

- As with any contract, only authorized persons may execute space lease contracts, only legitimate and appropriate contracts may be executed, and contracts must be in accordance with MGIC policy, relevant financial, legal, and sponsor requirements, and available budgets.

Space lease contracts require review by local legal counsel (charged to the appropriate line item in the award budget), as well as review by the UMB department operations lead and approval by the MGIC President. If a space lease contract is amended or modified, no matter how minor the changes, the same review and approval requirements apply.

- Exception: If a new space lease contract is drafted using the **same language** as a contract that underwent legal review in the previous 12 months (one-year period), the country office may forego the legal review. However, MGIC President approval is still required. If more than one year has lapsed since the prior legal review, a new legal review is required.

If a space lease contract is signed by an individual in the country office who has delegated authority to do so, the country office should immediately send a copy of the fully executed contract to the UMB International Operations department for MGIC's corporate files.

In the rare case that MGIC proposes to lease space to provide staff housing, the CD/CR must closely consult with the UMB department operations lead prior to proceeding.

Selecting office space

When searching for and choosing new office facilities, due consideration should be given to the following criteria:

- Safety and security, as relates to crime rates, number, and location of building egresses (exits), proximity to popular locations for public demonstrations, ability to secure the

premises, and other features of the neighborhood, parcel, and building, as well as hazards such as flooding, tsunamis, or earthquakes

- Sufficient and secure parking for MGIC vehicles and those of visitors
- Good and reliable water, stable electricity, and good internet service
- Proximity to partner organizations, including government entities
- Access by public transportation and by people living with disabilities
- Well-ventilated and sufficient workspace to avoid crowding and allow distance between desks
- Suitable space for conducting training workshops, when applicable
- Suitable space for nursing (lactating) mothers
- Storage space that is adequate for current and projected needs

It is recommended that for the office search process, the country office use a checklist with all relevant criteria.

Maintaining safe and secure facilities

MGIC should take measures to maintain a safe, secure, and healthy work environment, guided by [8-Safety and Security](#) and [4-10 Working Conditions](#). The DFA and the security focal point hold the chief responsibility for ensuring the safety and security of people and property in and near MGIC facilities. Specific actions to fulfill this responsibility in the main office and field sub-offices include the following:

- Access to keys or access/entry codes is carefully controlled
- Access by visitors is controlled in a manner appropriate to that security environment.
- Office lock-up procedures are spelled out in appropriate documents
- Offices contains safety supplies, such as fire extinguishers and first aid kits, and these are maintained to ensure viability in an emergency.
- The premises have adequate outdoor lighting for personal safety and property security.

Employees posted elsewhere

If the country office has personnel posted at a partner's facility – such as at a district health office – or in an approved teleworking (work from home) arrangement, consideration must also be given to safety and security at their worksite.

See [8-1 Overview of Safety and Security Policies and Procedures](#) regarding use of armed protection.

See [8-4 Modification, Suspension, and Closure of MGIC Operations](#) regarding office evacuations in case of a threat or incident such as a fire, robbery, active shooter, or rapid-onset conflict or natural disaster.

Reporting safety and security incidents at MGIC facilities and project sites

An [Incident Report Form](#) should be completed and submitted to the CD or CR and security focal point for any incident affecting the safety and security of people and/or property, **within 24 hours**. Reporting through an Incident Report Form is required even if the damage to MGIC property is deemed minimal.

Any incident in which a person is harmed, or a vehicle is damaged must be reported **as soon as possible to the UMB International Safety and Security Manager**.

See [8-3 Critical Incident Management](#) for information on critical incident management following the submission of an [Incident Report Form](#).

Checklist for CDs/CRs

- ☐ Do not execute space lease contracts unless properly authorized by the MGIC President
- ☐ Do not authorize or execute any contracts for purchase or new construction of spaces
- ☐ Have local legal counsel review all new and revised space lease contracts
- ☐ Ensure head office approves all space lease contracts – no exception
- ☐ Send copies of signed space lease contracts to the International Operations department without delay
- ☐ When searching for new office facilities, apply the selection criteria provided herein
- ☐ Compel all personnel to complete an [Incident Report Form](#) for any site incident affecting the security of people and/or property
- ☐ Report immediately to the UMB International Safety & Security Manager any incident in which a person is harmed, or a vehicle is damaged

Key references

- [Incident Report Form](#)
- [3-2 Establishing Operations](#)
- [4-10 Working Conditions](#)
- [5-4 Signature Authorities](#)
- [5-15 Procurement](#)
- [6-5 Subaward Implementation](#)
- [8-Safety and Security](#)
- [8-1 Overview of Safety and Security Policies and Procedures](#)
- [8-4 Modification, Suspension, and Closure of MGIC Operations](#)

3-5 Insurance

Policy statement

MGIC is required to carry certain types of insurance at all times to protect MGIC and UMB against risks associated with maintaining registration status and with operating international programs.

Insurance at the corporate or global level is procured and managed by the UMB International Operations department on behalf of MGIC. These coverages are funded by UMB discretionary and

indirect cost budgets held by both UMB Funding Units and Central Administration, with cost allocations agreed between the MGIC Board and the UMB Funding Units that engage MGIC services. These coverages are subject to change if the MGIC Board agrees to decentralize certain coverages to local MGIC offices, but presently include:

- Management Liability: Directors & Officers (D&O), Employment Practices and Third-Party Liability (EPL), and Crime
- Domestic Property, General Liability, and Hired Automotive Liability
- Special Coverage: Crisis and Threat Response
- Cyber Security
- International General Liability, Employee Benefits, Employer Liability, and International Property, in excess of and/or difference in conditions of local coverages
- Blanket Accident/Business Travel for MGIC/UMB business purposes, outside the personnel's country of residence and/or citizenship (part of UMB's policy and paid by UMB Central Administration)
- Specific insurances coverages as required by local regulations in countries where MGIC has a dormant registration and conducts no activities.

In countries where MGIC is not registered and does not have an office, but rather employs personnel through a third-party Employer of Record (EOR), the UMB International Operations department oversees the EOR's provision of professional liability and other employee insurance coverages required by local law. These costs are funded by the UMB Funding Unit(s) under whose program(s) the employee is engaged.

Insurance coverage associated entirely with the operation of MGIC country offices is the responsibility of individual offices to procure and maintain, at appropriate limits and with affordable deductibles. Such coverage must comply with this policy, local law, and sponsor terms and conditions.

In acquiring insurance, the country office must follow the usual procurement procedures. The cost of local insurance shall be charged to sponsored project accounts if allocable and allowable in accordance with sponsors' policies, or alternately to the indirect or discretionary funds of the UMB Funding Unit(s) utilizing the MGIC office.

Insurance coverage obtained by a country office must include the following:

- Insurance against loss, damage, or theft of assets, including motor vehicle insurance
- General liability insurance Professional liability insurance for healthcare workers, if applicable
- Locally required insurance for employees, e.g., health insurance and worker's compensation
- Directors' and officers' liability insurance for MGIC affiliate Boards, if applicable

Note: As of 2023, UMB's Blanket Travel Accident and Sickness Insurance policy covers all MGIC personnel for all travel outside the personnel's country of residence and/or citizenship, for MGIC or UMB business purposes. MGIC offices are no longer required to procure international travel insurance directly.

MGIC may reimburse an individual for purchase of personal insurance only if the insurance concerns a risk directly related to conducting program activities and the purchase is approved in advance by the UMB department administrator.

For information on liability insurance that contractors must carry for MGIC-funded refitting projects, see [6-Award and Subaward Management](#).

Insurance against loss, damage, or theft

MGIC offices must have insurance coverage against loss, damage, or theft of MGIC and UMB physical and intangible assets, including bank accounts, cash-in-transit, leased space, vehicles, and office and IT equipment.

MGIC requirements for carrying **motor vehicle insurance** are laid out in [Acquiring and insuring motor vehicles](#) in 3-9 Vehicle Use and Fleet Management. The procedures address a variety of scenarios, including when vehicles are leased, borrowed from another organization, or lent to another organization.

General liability insurance

MGIC offices must carry general liability insurance that covers all operations and premises, and that provides indemnity from and against claims resulting from bodily injury, accidents, death, and damage to MGIC property or another's property. This coverage must name MGIC and UMB as insureds or additional insureds and must cover all personnel as insureds or additional insureds. The office should work with an insurance broker to ensure adequate insurance coverage is in place, with the maximum coverage recommended as US\$200,000 or otherwise stipulated by local legal counsel.

Professional liability insurance

MGIC offices must acquire professional liability insurance if any personnel who are healthcare workers are assigned to tasks requiring use of their healthcare professional skills for MGIC programs. All such healthcare workers must be insured persons. The policy coverage must provide for defense of claims and costs of defense, as well as indemnity for liability.

Locally required insurance for employees

MGIC offices must provide employees with health insurance, worker's compensation, and any other insurance coverage required by law, by sponsor terms and conditions, or by MGIC employment agreements. See [4-Human Resources](#) for details.

Directors' and officers' liability insurance

MGIC offices with a local (in-country) board of directors must carry directors' and officers' liability insurance for claims against MGIC.

Exceptions and UMB review of insurance coverage

Exceptions: If a country office would like an exemption from a type of insurance coverage that this Policy requires, the DFA should contact the UMB department administrator who, if in agreement, will seek the MGIC VP – Policy & Administration's approval in writing.

Additional insurance: MGIC offices seeking additional insurance coverage to meet operational needs should research the options and obtain written advice from local insurance consultants, brokers, or lawyers with experience in advising foreign entities concerning in-country coverage. The adviser

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must be made aware of any sponsor requirements, so those may be taken into account. Once the office has a proposed insurance policy in hand, with details on coverage and coverage limits, the office should send it to the UMB department administrator for review prior to purchase.

Annual reporting: On an annual basis at the end of the UMB fiscal year (June 30th), the MGIC office submits an [Insurance Portfolio Annual Report](#) with the June monthly financial report. Upon receipt, the head office conducts an annual review of that portfolio and advises the country office if any concerns arise as part of that process.

Checklist for CDs/CRs

- ☐ Ensure the country office is carrying all the forms of insurance coverage required by this Policy, local law, and sponsor terms and conditions
- ☐ Seek prior UMB review if intending to procure additional insurance coverage to meet operational needs
- ☐ Submit a complete and up-to-date [Insurance Portfolio Annual Report](#) with the June monthly financial report

Key references

- [Insurance Portfolio Annual Report](#)
- [3-9 Vehicle Use and Fleet Management](#)
- [4-Human Resources](#)
- [6-Award and Subaward Management](#)

3-6 Property Management

Policy statement

MGIC is accountable to UMB for all capital and non-capital assets purchased using funds awarded under Payment Authorization Agreements and UMB lightly restricted and unrestricted funds. This Policy applies to all physical equipment (“property”) under MGIC’s control, whether the assets are owned by MGIC or assigned or loaned to MGIC by a sponsor or other entity.

Acquisition, transfer, and disposition of capital assets all require prior UMB approval and often sponsor approval as well. Appropriate insurance coverage must be maintained (see [3-6 Insurance](#)).

Personnel, whether assigned to a physical office or working remotely from a home office, are responsible for ensuring the assets are used properly, with care, and exclusively for MGIC and UMB activities by authorized personnel. They must follow MGIC and UMB reporting procedures for lost, stolen, or damaged property.

MGIC offices must implement property management procedures to identify, record, control, and dispose of property as defined in this Policy and in compliance with USG equipment requirements ([2 CFR 200.313](#) in the [USG Uniform Guidance](#)). This includes conducting a full physical verification of all property on at least an annual basis and providing head office with an updated [Inventory Register](#) as part of the country office’s June financial report.

In the unusual case that MGIC intends to acquire “real property” in the form of buildings or land, whether for a cost or at no cost, prior approval from the MGIC Board of Directors is required.

In countries where MGIC does not have a physical office, the [International Operations department](#) may act to acquire and maintain property and inventory records on behalf of UMB Funding Units.

Asset categories

Assets are physical equipment or property, and as relates to property management, they fall into the following categories:

A **capital asset**, known as “equipment,” is defined as any item that (1) is durable with an expected service life of one or more years; (2) has a purchase value (cost) of US\$5,000 or more; and (3) is complete in itself and does not lose its identity or become a component part of another article when put into use.

A **non-capital asset (NCA)** is a physical asset with an acquisition cost of US\$500 or more, but less than US\$5,000 per unit, and with a useful life of greater than one year.

A **designated non-capital asset (DNCA)** is an asset valued at less than US\$500 that merits additional stewardship – such as documentation showing assignment to an employee – because such assets are desirable, easily converted to personal use, and susceptible to theft. Typically, these assets are not fixed to a permanent structure and can be easily removed or carried, such as a tablet or laptop computer.

Acquisition cost refers to the total cost of acquiring an asset, which includes the asset cost itself, as well as taxes, shipping, delivery, set-up costs, discounts, value of any warranty, and operating system software, memory, or other additions listed on the asset invoice that are integral to the equipment. The costs associated with maintenance service agreements are not included in the acquisition cost.

Property lead

The CD/CR or DFA must designate a staff member to serve as “property lead.” The property lead is responsible for ensuring that MGIC property management standards and procedures are met. The person serves as a custodian of the assets and is responsible for custodial care, which broadly includes the care, maintenance, recordkeeping, control, and disposition of the property. Examples include making sure assets are tagged, the [Inventory Register](#) is up-to-date, and, as appropriate, assets are secured in a locked room or cabinet when not in service.

Where there is no MGIC office in-country, the IO department provides Property Lead support to UMB funding unit(s) to ensure policy compliance.

Property acquisition

As with any procurement, the process of procuring property must be conducted in compliance with the applicable MGIC and UMB policies, sponsor requirements, and local laws, rules, and regulations and as prescribed in [5-15 Procurement](#).

- All personnel involved in procuring property are expected to adhere to and act in accordance with the [2-2 MGIC Code of Ethics and Professional Conduct](#), which includes all laws, rules, regulations, policies, and procedures applicable to their MGIC activities.
- Requirements for competitive procurement must be met, regardless of funding source. Justification of sole-source procurements must be fully documented.
- Procurement levels or thresholds apply to the entire acquisition cost, defined above.
- Procurements must be approved as required for each procurement level and in accordance within current signature authority delegations. Procurements with an aggregate value of or over US\$5,000 must be submitted to the UMB department administrator for approval.

MGIC may also acquire property through transfer or donation from an external entity. If the donated items may count toward fulfilling cost share commitments, the country office should follow the guidance in Cost share and in-kind contributions in [5-7 Financial Management](#) for how to handle this situation.

Capital assets, NCAs, and DNCAs all require identification and tracking, and as such, asset tags shall be affixed to the items and the items included in the country office's [Inventory Register](#).

Property records and controls

MGIC offices maintain property controls for capital and non-capital assets to minimize the risk of loss, theft, damage, or misappropriation of equipment. Segregation of duties is required for property control functions between procurement, custody of assets, recordkeeping, and inventory verification.

Unless otherwise delegated by the CD, the DFA is responsible for supervising the property lead and ensuring the country office tags assets and maintains a complete and accurate [Inventory Register](#). Acquisitions, transfers, and dispositions of assets should be reflected in the register in a timely manner.

Where there is no country office, the IO department maintains an inventory of all MGIC property procured with UMB funds.

Annual physical inventory

DFAs must also ensure that on at least an annual basis, the office conducts and documents evidence of a full physical inventory verification of capital and designated non-capital equipment.

The annual inventory entails affirming that the **Asset Transfer History is correct and up-to-date** and physically checking (in person) and updating the register as required:

1. The item's **Physical Location**
2. The item's **Condition** (new, good, fair, etc.).
3. The name of the individual responsible for the asset (**Asset Control/Assigned User**)

Inventory best practices

- Collaborative effort by the property lead and IT support lead
- Full inventory review conducted two or three times per year

As part of this review, the individuals conducting the inventory review must put their names and the date in the Register's **Physical Inventory Verification** columns.

An updated [Inventory Register](#) is required as part of the financial report the MGIC office submits for the month of June. Along with the register, the DFAs and the property lead provide a signed [Inventory Certification Form](#). By signing, they are certifying that a full inventory was conducted and that they are accepting responsibility for its completeness and accuracy.

Property use and care

MGIC facilities and assets are intended for the exclusive use of MGIC, UMB, and their authorized employees. The MGIC office is responsible for having maintenance procedures in place to keep property secure and in good condition.

All personnel, regardless of whether they are assigned to an MGIC office or working remotely or in another MGIC structure (such as embedded within another institution) are responsible for the proper use, care, and control of property, including assets assigned to them as well as MGIC facilities they occupy for the duration of their employment. They should take reasonable precautions in protecting and caring for equipment, its contents, and any peripheral devices or accessories from loss, damage, or misappropriation.

Employees can be held liable financially and otherwise for property that is misappropriated, misused, damaged, or lost because of their negligence or willful misconduct. In such cases, employees may be subject to disciplinary action up to and including termination of employment and may be referred for criminal investigation and possible prosecution.

Assigned equipment: Personnel who receive portable equipment (e.g., laptop computers, mobile phones, cameras) must complete an [Employee Equipment Acknowledgement Form \(EEAF\)](#). The form is kept in the recipient's personnel file and is updated as needed as a record of office assets in the person's possession. Personnel must return these items to their supervisor, the property lead, the IT support lead, and/or other designated persons at the end of their assignment or upon request.

Use of MGIC phones and other communication systems: All communication systems are MGIC or UMB property and are to be used for business purposes only. Personnel should have no expectation of privacy regarding their personal use of any MGIC or UMB communication systems, and their communications and systems use may be audited by authorized management at any time without notice. Communication systems include, but are not limited to email, phone, text, and social media.

Drawing from this Policy's requirements and [7-5 Acceptable Use](#) in 7-IT Policies and Procedures, the country office should provide guidelines regarding:

- Acceptable use of landlines and mobile phones
- Financial and other arrangements for phone usage
- Provision of mobile phones to visiting international staff
- Acceptable use of email

Reporting property loss, damage, or theft

Personnel must immediately report lost, stolen, or damaged property to their supervisor and the property lead, who in turn shall notify the DFA. If a **capital asset** or **NCA** is lost, stolen, or damaged, the property lead or other responsible personnel shall submit an [Incident Report Form](#) to the DFA, CD, and security focal point and, if relevant, seek a police report.

An [Incident Report Form](#) should be completed and submitted to the CD or CR and security focal point for any incident affecting the safety and security of people and/or property, **within 24 hours**. Reporting through an Incident Report Form is required even if the damage to MGIC's vehicle or another vehicle is deemed minimal.

Any crash or other incident in which a person is harmed, or a vehicle is damaged must be reported **as soon as possible to the UMB International Safety and Security Manager**.

See [8-3 Critical Incident Management](#) for information on critical incident management following the submission of an Incident Report Form.

Property transfers

Donation of physical property: If MGIC donates equipment, supplies, materials, and other assets to another entity, a [Certificate of Donation](#) is completed and signed by the CD or CR and an official of the recipient entity. The certificate includes a complete list of the donation, the vendor's invoice, and the bill of lading or airway bill, as relevant. Information such as donor, consignee, item descriptions, and values must be consistent across each of these documents and any other documents used in the shipping and donation process.

Internal transfer of assets: MGIC offices may transfer an asset internally, from one location to another or from one project to another, assuming the use still conforms to any sponsor and legal requirements associated with that asset. The property lead ensures:

- An [Equipment Transfer Form](#) is completed and placed on file
- The [Inventory Register](#) is updated, notably the "Asset Transfer History" along with the project with which the asset is associated, its physical location, and/or the person responsible for control of that asset

External loan of assets: If MGIC proposes to lend an asset to another entity, and assuming the use still conforms to any sponsor and legal requirements associated with that asset, an [Equipment Use Loan Agreement \(Template\)](#) is completed and signed by the CD/CR and an official of the recipient entity. One copy is provided to the other entity and the original retained by the office.

When the physical transfer of that asset takes place, an [Equipment Transfer Form](#) is completed, signed by both parties, attached to the Equipment Use Loan Agreement, and placed in the office files.

Property disposition

When equipment is no longer in serviceable condition or is no longer needed for the original project or program or for other MGIC-approved activities, the office may dispose of the equipment through trade-in, inventory write-off (missing), discarded as unserviceable, stolen, sold, transferred to another entity, or another reasonable method.

Where there is no MGIC office in country, the IO Department manages the disposition of property in coordination with the UMB Funding Unit(s) and fills the roles of DFA and property lead described below.

Property disposition plan: The DFA develops a property disposition plan, naming for each asset the suggested method of disposition. It is suggested that the office follow this order of methods when disposing of property:

1. Redistribution of the asset within MGIC/UMB
2. Transfer to an external entity for use for similar purposes
3. Sale or exchange
4. Donation
5. Discarding or destruction

In determining the most beneficial method of disposition, the country office should consider factors such as the condition of the property, its value, other entities' need for it, and local sales interest.

Special approval for disposition of capital assets: UMB approval and, if required, sponsor approval must be obtained **prior to** disposition of capital assets. The disposition plan for the capital assets is submitted to the UMB department administrator for review and to work with other UMB personnel to obtain sponsor approval for the disposition of capital assets procured with sponsor funding. The UMB department administrator advises the DFA when approval is received.

UMB notification of proposed sale: If the MGIC office is proposing to sell an item or items recorded in the [Inventory Register](#), the DFA or property lead should notify the UMB department administrator, who will advise on any sponsor-related requirements for the proposed sale.

Data deletion process for IT equipment: Pieces of equipment that store data are known as **data storage devices** and they include desktop computers, laptops, network servers, mobile phones, multi-function printer/copiers, and removable devices such as USB flash drives and external drives. Data storage devices must be disposed of properly to ensure any sensitive data on the device is rendered unrecoverable. These devices may contain personal, confidential, and legally protected information that is still readable even when the files have been erased or the hard drive reformatted. Failure to destroy this information could lead to unauthorized access, identity theft, and liability to UMB and MGIC.

The property lead working with the IT support lead should establish a process to ensure that before the country office disposes of a data storage device, the stored data on that device are made unrecoverable through destruction or a process of "sanitization" (or "wiping"). See [7-4 Data and Systems Security](#) for more information.

Documentation for asset disposition: The MGIC office completes an [Asset Disposition Form](#) when disposing of any item of equipment recorded in the [Inventory Register](#). The form must be approved as part of the disposition process and signed by the recipient, where applicable. Supporting documentation of the actual disposition must be attached, in accordance with the following guidance for each method of disposition:

- Trade-in: copy of approved Purchase Requisition/Purchase Order indicating the trade-in
- Inventory write-off (missing): letter stating the item was not found during subsequent investigation by the DFA
- Discarded as unserviceable: documentation that the asset is unserviceable or, if unavailable, letter stating the asset was unserviceable and explaining the lack of supporting documentation
- Stolen: copy of police report filed on the theft of the asset
- Sold: documentation of sale

- Transferred to another entity: documentation of UMB prior approval and, if required, sponsor approval
- Other: appropriate documentation

Limitations on disposition to employees and their family members: MGIC prohibits giving assets free of charge or selling them at below-market prices to MGIC employees or organizations in which employees or their family members have a material financial interest. Moreover, MGIC prohibits employees or their family members from purchasing surplus assets if the employees' official duties engage them in any way in the asset disposition process. Any exception requires approval from both the CD and the relevant UMB department administrator.

Other sponsor requirements: Personnel involved in asset disposition should be familiar with and adhere to all sponsor requirements for the process. For example, a sponsor may provide instruction on the disposition of not just equipment, but also supplies with a residual value of US\$5,000 and above.

Checklist for CDs/CRs

- ☐ Obtain UMB approval in advance for the procurement, transfer, and/or disposition of all capital assets (equipment)
- ☐ Obtain MGIC Board of Directors' approval in advance of acquiring any buildings, land, or other real property.
- ☐ Ensure assets are used properly, with care, and exclusively for MGIC activities by authorized CO personnel
- ☐ Implement appropriate property management procedures to comply with MGIC Policies and sponsor requirements
- ☐ Ensure that the procurement process for property is in compliance with all appropriate policies, laws, and regulations
- ☐ Ensure an annual physical inventory is completed and submitted with June financial reports
- ☐ Foster a work environment where personnel take care and reasonable precautions for property assigned to them
- ☐ Document the receipt, damage, theft, or loss of property and notify the appropriate party
- ☐ Complete and have both parties sign a [Certificate of Donation](#) when donating physical property to another entity
- ☐ Ensure that internal transfers or external loans of property are done in accordance with MGIC Policy and with sponsor approval for capital assets procured with sponsored funding
- ☐ Prior to disposition, ensure that any data storage device has been properly "sanitized" to prevent information from being shared
- ☐ Adhere to MGIC's limitations on the transfer/sale of assets to MGIC personnel and their family members

Key references

- [Asset Disposition Form](#)
- [Certificate of Donation](#)
- [Employee Equipment Acknowledgement Form](#)
- [Equipment Transfer Form](#)
- [Equipment Use Loan Agreement \(Template\)](#)
- [Incident Report Form](#)
- [Inventory Certification Form](#)

- [Inventory Register](#)
- [2-2 MGIC Code of Ethics and Professional Conduct](#)
- [3-6 Insurance](#)
- [5-7 Financial Management Systems and Processes](#)
- [5-15 Procurement Policy](#)
- [7-4 Data and Systems Security](#)
- [7-5 Acceptable Use](#)
- [8-3 Critical Incident Management](#)
- [USG Uniform Guidance](#)

3-7 Travel

Policy statement

The policy and procedures for Travel apply to all MGIC personnel, as well as independent contractors and others traveling on MGIC business. This policy does not apply to procurement of conference venues and to event per diems for non-MGIC employees.

MGIC must have in place robust travel procedures to direct and control the processes for travel approval and travel expense reimbursement and to promote travel safety and security.

“Non-Employee” terminology

UMB defines MGIC personnel as “non-Employees.” Therefore, UMB’s procedure for Non-Employee International Travel applies to MGIC staff as well as to MGIC’s own “non-employees” such as consultants and others traveling on MGIC business.

All travel for MGIC business outside the country of the traveler’s duty station (i.e. International Travel) must follow the UMB procedure for [Non-Employee International Travel](#) including submission of a UMB Travel Attestation Form and adding the itinerary to International SOS in all cases.

Additionally, all international airfares for MGIC personnel and others traveling on MGIC business **must** book airfare through UMB’s Concur Travel System **when both of the following conditions apply**: 1) the cost of airfare is paid by a UMB PAA or other UMB source of funds, **AND** 2) any portion of the trip goes to, from, or through the United States and its territories.

Travel costs require close monitoring to ensure expenses are necessary, reasonable, allowable, allocable, and in compliance with sponsor rules and regulations. Regarding travel expenses:

- The travel must be necessary to carry out MGIC official business.
- The travel costs must be reasonable and consistently allocated to CO projects in conformance with the CO Cost Allocation Plan (see [5-9 Cost Allocation](#)).
- All travel must be approved by an authorized approver prior to travel. Personnel may not authorize their own travel.
-
- Travel advances may be issued to MGIC personnel by MGIC offices and must be administered with appropriate internal controls.
- Travel expenses by MGIC personnel and others traveling on MGIC business must be reimbursed or liquidated by MGIC offices through travel expense vouchers. Travel expense vouchers must include full supporting documentation in order for payment to be issued.

This policy defines the **minimum requirements** associated with travel by personnel. Country offices must develop and document necessary context-specific travel policies and procedures. These must comply with local tax and other laws and may be more stringent, but not more lax, than this global MGIC Policy and sponsor travel regulations and requirements.

For MGIC's policy and procedures related to vehicles, see [3-9 Vehicle Use and Fleet Management](#).

Overview of the travel procedures

Following are the procedures established in support of the Travel Policy laid out above. They commence with the overarching procurement requirements and then proceed to address key elements for travel. Click below to skip to the topic of interest.

- [Exceptions to travel policies and procedures](#)
- [Safety and security while traveling](#)
- [Definitions of "travel costs" and "in travel status"](#)
- [Expenses incurred during day travel \(not in travel status\)](#)
- [Per diem for in-country travel \(in travel status\)](#)
- [Lodging associated with in-country travel](#)
- [Trip preparation and scopes of work](#)
- [Travel authorization](#)
- [Booking international and regional travel](#)
- [Per diem for international travel](#)
- [Lodging associated with international travel](#)
- [Travel advances](#)
- [Reimbursable and non-reimbursable expenses](#)
- [Expense reimbursement](#)
- [Personal expenses while traveling](#)
- [Departure briefings and trip reports](#)
- [HO travelers to country offices](#)

Traveler's checklist

- ☐ Travel dates (set with colleagues)
- ☐ Scope of work (with colleagues)
- ☐ Travel Authorization Form
- ☐ Airline, train, and bus tickets
- ☐ Travel Advance Request Form
- ☐ Travel Expense Report

Exceptions to travel policies and procedures

In general, if exceptions to this Policy and established procedures are given to a traveler, the justification must be fully documented and approved by the DFA or country director **prior** to travel, unless emergency conditions preclude obtaining prior approval. If the traveler is the DFA or CD, the supervisor must approve the exception.

Note: Any proposal to procure an airline or rail ticket for business-class travel, to exceed the cap on lodging expenses, or to rent a vehicle while traveling requires approval as an exception to the Policy.

Safety and security while traveling

Travel can expose MGIC personnel to a wide variety of risks, especially in new contexts and insecure environments. Travelers should be familiar with measures to avoid potential danger and adhere to the Policies in [8-Safety and Security](#).

MGIC seeks to support the Safety and Security of international travelers through appropriate preparation and guidance, and through UMB's global assistance program provider. When traveling internationally, MGIC employees are responsible for registering with UMB's global assistance

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program provider. Further details and information are provided below and can be found on the UMB Global Hub website.

An [Incident Report Form](#) should be completed and submitted to the CD or CR and security focal point for any incident affecting the safety and security of people and/or property, **within 24 hours**. Reporting through an Incident Report Form is required even if the damage to MGIC's vehicle or another vehicle is deemed minimal.

Any crash or other incident in which a person is harmed, or a vehicle is damaged must be reported **as soon as possible to the UMB International Safety and Security Manager**.

See [8-3 Critical Incident Management](#) for information on critical incident management following the submission of an Incident Report Form.

Definitions of "travel costs" and "in travel status"

Travel costs are:

1. expenses for transportation, lodging, subsistence, and related items incurred by personnel who are **in travel status** on official MGIC business, and
2. expenses for personnel who are **not in travel status**, i.e., for travel within employees' normal work locations, when deemed necessary for the business activities of MGIC

Personnel are considered to be **in travel status** if their MGIC business travel takes them away from their duty station at a distance of at least 100 kilometers for a period of 12 hours or more. "In travel status" should be clearly defined in each operational context and may allow for exceptions to the 100-kilometer distance if a closer destination is particularly hard to reach.

An individual who is not MGIC personnel and whose travel costs may be charged to an MGIC source of funds is considered to be **in travel status for MGIC business** only when the business travel has been duly authorized by MGIC. The office may deny payment requests for business travel that was not approved prior to the trip.

Expenses incurred during day travel (not in travel status)

Certain expenses incurred by employees traveling within their normal work locations – that is, for day travel – are reimbursable. The categories of expenses may include taxi/transport services costs and pre-approved business meals.

Business Meals

If requesting reimbursement for a business meal, employees must clearly identify the business purpose and list the names of all personnel and guests present.

These reimbursements are based on **actual substantiated expenses** (e.g., itemized receipts) and not on per diems. The reimbursement must not exceed the applicable meals and incidental expenses (M&IE) rate.

Per diem for in-country travel (in travel status)

Per diem (also known as Meals & Incidental Expenses, or M&IE) is the allowance that travelers receive to cover their meals and incidental expenses while on official travel away from their duty station, i.e., when employees are in travel status. It does not include lodging. Per diem includes:

- **Meal expenses:** As guided by the “in travel status” definition, meals are covered only if the duration of the travel is at least 12 hours and at least 100 kilometers from the duty station, and the meals are not provided or are paid for by another entity (e.g., hotel, training organizer).
- **Incidental expenses:** The M&IE rate includes an allowance amount to cover small expenses in addition to meals. Examples of incidental expenses are tips given to drivers, porters, or hotel staff.

The DFA is responsible for ensuring that the office’s per diem rates in local currency are set and revaluated on an annual basis. If circumstances warrant, the rates may be adjusted mid-year. Proposed new and modified rates must be reviewed and **approved by the UMB department operations** lead prior to their implementation.

In countries where MGIC does not operate a full country office, but maintains one or more employees in-country who report to a UMB Funding Unit, the UMB Department of International Operations establishes the in-country per diem rate on behalf of MGIC.

MGIC M&IE rates for in-country travel may not exceed the [U.S. Department of State's Foreign Per Diem Rates](#). They should be location-specific and should vary by location within the country. (Typically, the rates are higher in cities than in small villages.)

MGIC offices must use one set of per diem rates for all personnel assigned to that office as the duty station, regardless of whether they are regular or temporary staff or whether they are on UMB payroll, MGIC payroll, or another UMB-authorized payroll. (In contrast, UMB personnel visiting MGIC country offices use international per diem rates, described below.)

Lodging associated with in-country or international travel

Lodging expenses must be reasonable and necessary to meet the purpose for the business travel.

- **Reasonable:** Lodging must not be lavish or extravagant under the circumstances and must not provide any significant element of personal pleasure, recreation, or benefit.
- **Necessary:** Lodging must be necessary for the individual to participate fully in or be available for a business meeting, conference, training activity, or other business function, or the individual is required to remain at the activity or function overnight.

The DFA is responsible for setting and revaluating on an annual basis the MGIC country office’s cap on lodging expenses. In countries where MGIC does not maintain a full country office, the UMB department of International Operations will establish lodging expense caps for MGIC personnel. That cap may not exceed the lodging amounts provided in the [U.S. Department of State's Foreign Per Diem Rates](#).

Whenever possible, an MGIC office or UMB Funding Unit covering the travel cost pays directly for accommodations. Only in rare circumstances may an MGIC employee or non-employee traveling on MGIC business pay for lodging directly and seek reimbursement. In the latter case, a signed receipt or other proof of purchase (e.g., a signed [Receipt Voucher](#)) is required.

Trip preparation and scopes of work

In view of the high cost of international travel and of travel in general and the opportunity to obtain lower fares by planning ahead, employees should prepare for their trips well in advance whenever possible. They should also coordinate with each other and consolidate all business to limit the number of consecutive trips that they may need to take.

Planning ahead is also important for making optimal use of the in-person time provided by the visit. Employees planning an international trip should develop a written **scope of work (SOW)** in consultation with their supervisor and in collaboration with MGIC/UMB colleagues at their destination and decide jointly on the best timing for the visit. The SOW lays out the activities planned for the trip and includes the initial security briefing and, as applicable, other in-briefings, persons and organizations with whom the traveler plans to meet, and an out-briefing at the conclusion of the visit. See the [Trip SOW and Report \(Sample\)](#).

Note: The traveler need not prepare a scope of work if the purpose of travel is to attend an event, such as a conference or training workshop, and not to accomplish another specific work purpose outside of the event.

Travel authorization

MGIC employees who report into a Country Office structure should complete an MGIC [Travel Authorization Form](#) at least seven days before the start of planned travel that will take them away from their duty station at a distance of at least 100 kilometers for a period of 12 hours or more.

Special Note: for any business travel by MGIC employees and non-employees on MGIC business (such as consultants) that goes **to, from, or through the United States and its territories**, it is recommended that the MGIC Travel Authorization Form be completed at least 21 days prior to travel, given the additional UMB/MGIC policy and procedure requirements for these routings as described below.

Travel by non-MGIC personnel

Business travel by non-MGIC personnel is subject to the same requirements as for MGIC personnel, unless the country office has established stricter provisions than those laid out in this Travel Policy.

Approval: MGIC Travel Authorization Forms must clearly articulate the business purpose of the travel and be approved by:

1. The **traveler's supervisor**, who in signing is giving approval for this person's travel on MGIC business and indicating that the travel costs are allowable
2. A **program manager** authorized to give approval (only required if supervisor is not a program manager)
3. A **finance manager authorized to approve the expenditure of funds for that travel**, who in signing is affirming that the funds for such travel are available in the budget of the project indicated on the form
4. For international travel, which includes travel to other countries in the same region, the **UMB department operations lead**

Notes:

1. ***No airline ticket may be procured, nor any travel advance issued without an approved Travel Authorization Form on hand.***
2. A traveler may not approve their own Travel Authorization Form or payment request

3. Approvers may not approve Travel Authorization Forms or payments for family members or other individuals whose travel for MGIC business would pose a real or apparent conflict of interest.

MGIC employees who report directly to a UMB unit rather than to an MGIC country office structure may request supervisor approval to follow UMB's travel authorization request procedure in lieu of the MGIC [Travel Authorization Form](#). However, all MGIC personnel reporting to an MGIC Country Office must complete **both** the MGIC and UMB travel authorization request procedures for any international or regional travel. See next section.

Booking international and regional travel

All travel by MGIC personnel and others traveling on MGIC business **outside the country of the traveler's duty station** (i.e. International and Regional Travel) must follow the UMB procedure for [Non-employee International Travel](#), which can be found on UMB's Global Hub.

This procedure is in addition to the MGIC Travel Authorization Form, which is the means by which MGIC management approves the planned trip and anticipated costs. By contrast, the UMB procedure for Non-employee International Travel, which applies to MGIC, is the process by which travel itineraries are entered into UMB's international safety and security system and also the means by which travel to, from, or to the U.S. is purchased in compliance with UMB's [Policy on Business Travel](#).

Upon completion of the MGIC Travel Authorization Form and MGIC approval of the proposed trip, the traveler must follow the steps outlined in the UMB [Non-Employee International Travel Information](#) page in UMB's Global Hub. There are four steps applicable to all international and regional travel by personnel and non-employees on MGIC business:

Personal Safety and Security Training: Personnel are strongly encouraged to register with and take the online safety and security courses offered by UMB for international travel.

Check for High-Risk Destinations: Check to see if one or more of the traveler's destination countries are rated High or Extreme Travel Risk.

Complete the Traveler Attestation Form for Nonemployees. Fill in the Travel Risk Security ratings for the traveler's destination in the [International Traveler Attestation Form for Nonemployees](#) and sign the form. The signed form is routed in DocuSign to UMB's department for International Operations (IO) for review; any travel through locations designated as High or Extreme Travel Risk requires approval by IO and the traveler will be contacted by IO to discuss the risks and mitigations.

Register the trip with UMB's global assistance program provider. If booking international travel outside of UMB's Concur Travel system, the trip must be uploaded manually to the global assistance provider's portal. Guidance on this step can be found at the UMB Global Hub website, or through the MGIC office's UMB department operations lead.

Travel To, From, or Through the United States and its Territories

MGIC personnel, independent contractors hired by MGIC, and others traveling on MGIC business **must** book airfare through UMB's Concur Travel System **when both the following conditions apply:** 1) the cost of airfare is paid by a UMB PAA or other UMB source of funds, AND 2) any portion of the

trip goes to, from, or through the United States and its territories. See [UMB Business Travel Policy and Procedure](#) for more information.

The procedures and steps for personnel and others traveling on MGIC business to, from, or through the U.S. can be found at the UMB [Non-Employee International Travel Information](#) page in UMB's Global Hub. Contact the MGIC office's UMB department operations lead or the Global Hub for guidance and support.

Although MGIC personnel and others traveling on MGIC business will have already obtained relevant MGIC approvals through the MGIC Travel Authorization Form, UMB approval workflows are built into the Concur system based on the UMB Funding Unit that is funding the travel.

International and Regional Travel that does not require booking through UMB's Concur Travel System

MGIC personnel are recommended, but not required, to use UMB's Concur Travel System to book all international and regional travel **that does not pass to, from, or through the U.S.** Local procurement may be preferable for travel that does not pass to, from, or through the U.S. when there is significant budgetary savings or access to more appropriate flight routes. In such cases, the MGIC office procures the ticket directly through local travel agencies.

MGIC's procurement policy applies to all tickets purchased for travel that does not go to, from, or through the United States and its territories, whether by train, bus, airplane, or other means of public transport. See [5-15 Procurement](#).

Travel class: All air, train, and care hire fares, no matter the destination, must be purchased in the coach/economy fare class via the most direct route offered by commercial transporters. With written justification, affirmation of budget availability and allowability by the sponsor, and DFA or CD approval **prior to** booking the fare, business-class fare may be paid under one of the following conditions:

- When necessary because it is the only service offered between two points
- When work-related schedules, routing changes, or cancellation of service make such travel necessary
- Where the origin and/or destination is international and the scheduled flight time, including non-overnight stopovers and change of planes or trains, is in excess of 14 hours
- When such accommodations are necessary as reasonable accommodations of an individual's condition based on a current written statement of a healthcare provider who is currently treating the employee for the condition

Exceptions due to health conditions of a traveler or other justifiable reasons must be fully documented and approved by the DFA or CD/CR prior to booking the travel. If the traveler is the DFA or CD/CR, the UMB department program lead funding the travel must approve the exception.

First-class airfare or other transportation modes is an unallowable expense – see [Reimbursable and non-reimbursable travel expenses](#).

Compliance with sponsor rules and regulations: Business travel that is funded by a sponsor must comply with the terms of the award between the sponsor and UMB. For proposed international travel that is not contemplated in an award proposal and budget, UMB may need to seek sponsor

approval. In such cases, the MGIC office contacts the UMB department operations lead, who will make a determination and seek sponsor approval if required.

Fly America Act: When federal USG-sourced funds will be charged for international travel, MGIC must comply with the [U.S. Government Fly America Act](#). The Fly America Act only pertains to federal USG funds, not to state government funding sources. It requires:

1. Use of U.S. flag air carrier service when traveling to and from the United States and where available between non-U.S. countries OR use of a foreign air carrier *when code sharing is present*
2. Documentation of exceptions to the use of U.S. flag air carrier service as part of the travel request
3. Approval of exceptions by authorized management **prior to booking** the travel

“When code sharing is present” means when the non-U.S. flag air carrier’s flight is considered the same as one operated by a U.S. flag air carrier. In these cases, specific documentation is required: the U.S. flag air carrier’s designator code must be present in the area next to the flight numbers on the airline ticket, boarding pass, or electronic ticket/receipt.

Per diem for international travel

Per diem rates for international travel are set by the UMB department funding the trip and are provided only for M&IE. The rates include taxes and tips.

For a partial day’s travel on the **day of departure** and on the **day of return, 75% of the M&IE rate is provided**. This applies even if the departure time was very early in the morning, or the time of return was quite late in the day.

Meal expenses: If meals are provided during travel, the M&IE allowance is reduced accordingly. This applies when meals are offered free of charge, when another entity pays for the meals, when the meals are included as part of a conference registration fee or a hotel overnight charge, and when airlines provide free in-flight meals. Reductions are as follows:

- 15% for breakfast
- 25% for lunch
- 40% for dinner

Calculating Reductions in Per Diem Payments

Example: Per diem rate is US\$100 per day

Situation	Action	Amount of Per Diem to Pay
Was a free breakfast provided by the hotel?	Reduce per diem by 15% – even if the employee chooses to pay to eat elsewhere.	US\$85
Was lunch provided to all workshop participants?	Reduce per diem by 25%.	US\$75
Did the partner representative pay for dinner?	Reduce per diem by 40%.	US\$60
Were lunches and dinners paid for in advance as part of the conference registration fee?	Reduce per diem by 65% for each day of the conference.	US\$35

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The cost of meals offered as part of a conference registration is allowable even if the cost exceeds the standard meal rate for the conference location.

When international travel lasts for more than 30 consecutive days in one location and the lodging includes a kitchen, the meal reimbursement rate is 50% of the applicable daily meal rate, and no incidental rate is paid.

Incidental expenses: 20% of the M&IE rate is an allowance for small, incidental expenses in addition to meals.

Travel advances

Travel advances may only be issued to MGIC personnel. UMB faculty and staff may not receive travel advances from any MGIC office.

Travel advances may only be issued once the finance team has in hand a **fully approved** [Travel Authorization Form](#) and [Travel Advance Request Form](#).

As laid out in detail in [5-13 Advances](#):

- Travelers should request travel advances **at least five business days** prior to the start of planned travel.
- An outstanding travel advance must be retired before a new travel advance may be issued.
- A travel advance may be issued for two back-to-back trips, if the time in between the trips is insufficient to reconcile a current advance and request and receive a new advance.
- Advances should be retired (cleared) as soon after completion of travel as is feasible and **within 10 business days (2 weeks)**. The country office may impose a more stringent timeline, in which case the CO policy should clearly define the limited cases in which exceptions are permitted.

A travel advance request may include up to 100% of the M&IE for that travel.

Whenever possible, the MGIC office pays directly for accommodations by electronic payment or check. In some cases, another MGIC office pays and charges the appropriate budget. As a last option and in rare circumstances, the cost of accommodations may be paid by the traveler and the anticipated expense accounted for in the funds advanced to the traveler.

Reimbursable and non-reimbursable expenses

When personnel incur business travel expenses, they may be reimbursed by MGIC if the expenses are:

- Allowable
- Directly related to the business purpose of the trip
- Evidenced by supporting documentation such as receipts
- Within the guidelines set forth in this Policy and related procedures

All UMB faculty and staff must submit expense reports to UMB through the Concur travel system and be reimbursed for approved travel expenses directly by UMB. MGIC may not reimburse UMB employees for travel.

Childcare expenses: The country office's HR Handbook may provide for reimbursement of childcare costs associated with employees' travel, with certain limitations and budget permitting.

Miscellaneous allowable expenses: The following list provides examples of travel expenses that are reimbursable upon presentation of supporting documentation; it is not intended to be all inclusive.

- Ground transportation to and from airports, railroad stations, hotels, and meeting places
- Parking fees
- Laundry services, when an employee is required to be in travel status for longer than one week
- Registration fees charged by organizations for attendance at conferences and workshops, if not paid in advance by the country office
- Visas and passports obtained for the purpose of international business travel
- Inoculations, prophylactic medicines, and screening tests required for international business travel
- Photographs for travel documents
- Internet services to conduct MGIC business
- Baggage expenses for the first checked bag and for business-related additional bags
- Business Center costs for administrative services with a business purpose, such as photocopying business documents

Unallowable travel expenses: The following list provides examples of travel expenses that are not allowable and will not be reimbursed; it is not intended to be all inclusive.

- Travel expenses for relatives, dependents, friends, companions, or pets, except when dependent travel is stipulated in the employment agreement or when childcare expenses are reimbursable according to the HR Handbook
- Pet boarding or house-sitting expenses
- Travel expenses incurred for personal convenience or preference, or otherwise not required to fulfill the business purpose of the travel
- Fees incurred to fulfill personal requests (e.g., to obtain an aisle seat)
- Magazines, newspapers, or other purchased media
- Personal entertainment, including but not limited to movies, saunas, and massages
- Commute mileage (mileage traveled routinely between one's residence and primary worksite)
- Fines, traffic citations, parking tickets
- First-class airfare
- Airfare purchased using frequent flyer miles
- Flight insurance beyond the international travel insurance carried by UMB or procured by the country office
- Lost baggage
- Travel upgrade fees
- Airport club membership fees
- Lost or stolen tickets, cash, or property
- Costs incurred by unreasonable failure to cancel transportation or hotel reservations

- Upgrades to hotel rooms, fees related to hotel late check-out for personal reasons (as opposed to business reasons)
- Food, beverages, and snacks in excess of per diem meal rates
- Alcoholic beverages
- Gifts to hosts and sponsors

Note: Tips are to be paid out of the M&IE allowance.

Expense reimbursement

To the extent possible, the MGIC office should seek to pay travel costs directly and minimize the costs that require reimbursement to personnel.

Expense reports: As soon after completion of the travel or project activities as feasible – **and within 10 business days (2 weeks)** – the employee submits to their supervisor an [Travel Expense Report](#) with the required supporting documentation (hotel bill, taxi receipt, etc.) and a copy of their [Travel Advance Request Form](#). The employee completes the report using the same currency as the currency in which the advance was issued. See [5-13 Advances](#) for details.

Foreign currency: When personnel have used foreign currency during their travels, they attach foreign currency exchange receipts, credit card or bank statements, or other documentation showing exchange rates for the transaction dates. If such documentation is not available, the employee uses a reliable foreign currency convertor tool (e.g., [OANDA](#)) to convert the foreign currency amounts to local currency.

Non-business expenses: Expenses for any portion of a trip that is not for MGIC business purposes are clearly identified and excluded from the payment request.

Conference/workshop documentation: Travelers attending a conference, training workshop, or other similar event submit a copy of the agenda or the invitation as supporting documentation.

Lost or missing receipts and other documentation: In circumstances where receipts are not provided, CO personnel should present vendors with a [Receipt Voucher](#) and ask them to complete it as substitute documentation. If receipts or other supporting documentation have been lost, damaged, or destroyed or are unobtainable, reimbursement is allowed only in extenuating circumstances. In such cases, personnel seeking reimbursement complete and sign a [Lost or Missing Receipt Form](#) and attach it to their [Travel Expense Report](#).

Payments for other traveler's costs: Travelers should avoid paying for another traveler's costs. However, when the situation cannot be avoided, travelers who pay for another's costs include the expenses in their [Travel Expense Report](#) and note the name and the job title of the other traveler, along with an explanation of the circumstances.

Trips involving multiple travelers who share expenses will be reimbursed to the traveler(s) who paid the expenses as designated on their [Travel Expense Report](#). Travelers sharing expenses are encouraged to obtain separate receipts and submit separate claims for reimbursement of the expenses.

MGIC travelers may not reimburse a UMB employee's expenses. All UMB faculty and staff travel expenses paid by the employee must be reimbursed directly by UMB through the Concur travel system.

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Personal expenses while traveling

An employee who would like to include personal travel within an official business travel itinerary must seek prior approval from their supervisor. If the arrangement is approved, the employee must personally pay for and/or reimburse the country office for all travel costs that are above the expenses of business travel.

Travel completion briefings and trip reports

The following applies to international travel and may also prove useful for in-country trips.

All travelers should engage in an out-briefing meeting prior to the conclusion of a visit. Travelers should prepare for these meetings by carefully considering what issues they would like to raise, how best to raise them, and what follow-up actions they would like to discuss.

It is recommended that travelers document the key points reviewed during the meeting, with indication as to who is responsible for each follow-up action and in what timeframe. The [Trip SOW and Report \(Sample\)](#) provides a simple tool for documenting those actions steps as well as for indicating whether the intended activities and networking were accomplished, what unplanned activities also took place, and what issues arose that the traveler would like to highlight.

Documentation of trip outcomes – whether informal or in the form of a Trip Report – should be shared, at a minimum, with the traveler’s supervisor and with MGIC colleagues and others who participated in the out-briefing meeting.

UMB travelers to MGIC offices or on MGIC business

UMB personnel who travel to a country office are responsible to pay directly for business travel expenses, including hotel, meals, local airfare and visa expenses, and to seek reimbursement for business travel expenses from UMB as required under UMB policy and procedures. MGIC country offices are responsible for assisting the UMB traveler with arrangements, negotiations, and reservations for travel in-country. When, for practical reasons, MGIC pays directly for a UMB traveler’s accommodations or airline tickets, MGIC bills these expenses back to the appropriate UMB budget.

The country office may not process claims from UMB travelers to receive travel reimbursement from the country office.

Checklist for CDs/CRs

- ☐ Develop detailed and context-specific travel procedures, ensuring these comply with local tax and other laws, MGIC policy, and sponsor requirements
- ☐ Maintain a HO-approved rates list that includes location-specific maximum lodging rates and per diem rates for meals and incidentals
- ☐ Encourage ample advance planning for trips in order to obtain lower fares and make optimal use of in-person time during the visit
- ☐ Ensure supporting documentation for travel authorizations, travel advances, and travel expenses reports is complete and has the proper required authorizations
- ☐ Follow MGIC procurement policies and comply with sponsor requirements for all tickets purchased for travel

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- ☐ Ensure all approved expenses are allowable, directly related to the business purpose of the trip, evidenced by supporting documentation, and within the dictates of this Policy
- ☐ Seek to pay travel costs directly as much as possible to minimize the costs that require reimbursement to personnel
- ☐ Ensure prior approval is given to employees who seek to include personal travel with official business travel
- ☐ Encourage development of clear trip SOWs in collaboration with MGIC/UMB colleagues at the traveler's destination and encourage documentation of trip outcomes, including action steps
- ☐ Do not process claims to reimburse HO travelers from the country office without prior written approval by the UMB department administrator

Key references

- [Incident Report Form](#)
- [Lost or Missing Receipt Form](#)
- [Receipt Voucher](#)
- [Travel Advance Request Form](#)
- [Travel Authorization Form](#)
- [Travel Expense Report](#)
- [Trip SOW and Report \(Sample\)](#)
- [3-6 Insurance](#)
- [3-9 Vehicle Use and Fleet Management](#)
- [5-9 Cost Allocation](#)
- [5-13 Advances](#)
- [5-15 Procurement](#)
- [8-Safety and Security](#)
- [8-1 Overview of Safety and Security Policies](#)
- [8-3 Critical Incident Management](#)
- [OANDA](#)
- [U.S. Department of State's Foreign Per Diem Rates](#)
- [U.S. Government Fly America Act](#)

3-8 Vehicle Use and Fleet Management

Policy statement

MGIC motorized vehicles – which include cars, trucks, and motorcycles – are made available to staff to carry out their official duties in support of the country office's projects and operations. They must be used for business purposes unless personal use is authorized by the CD or CR (or CD/CR supervisor) and is reimbursed fully.

In limited circumstances, individuals who are not MGIC personnel may be transported by MGIC's motor vehicles. Categories of permitted passengers are official visitors and partner and community representatives. Unauthorized personnel may not be provided transport in MGIC vehicles.

Only authorized drivers may drive a vehicle that is procured or leased by MGIC.

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MGIC motor vehicles are to be managed and operated with due concern for the financial, legal, and safety risk associated with these large-value assets.

An [Incident Report Form](#) should be completed and submitted to the CD or CR and security focal point for any incident affecting the safety and security of people and/or property, **within 24 hours**. Reporting through an Incident Report Form is required even if the damage to MGIC's vehicle or another vehicle is deemed minimal.

Any crash or other incident in which a person is harmed, or a vehicle is damaged must be reported **as soon as possible to the UMB International Safety and Security Manager**.

See [8 – Safety and Security](#) for information on incident management following the submission of an Incident Report Form.

Acquiring and insuring motor vehicles

Procurement: The process for procuring any vehicle, whether an automobile, van, truck, motorcycle, or other type, by MGIC must follow the policy laid out in [5-15 Procurement](#). Vehicles may not be registered in UMB's name.

Rented/leased vehicles: At times, it may be in MGIC's best interest to lease rather than procure a vehicle. Long-term leasing of vehicles requires prior consultation with the UMB department operations lead, prior review of rental contracts by local legal counsel, and acquisition of insurance. Rental costs must meet the requirements of the [USG Uniform Guidance \(2 CFR 200.465\)](#).

Vehicle insurance: MGIC requires insurance for all motor vehicles:

- Whether procured or leased
- Whether titled to MGIC or another entity
- Regardless of who is in possession of the vehicles
- Regardless of who is operating the vehicles

Each vehicle must have insurance at levels appropriate to the local context and in the form of property and liability insurance as well as all-risk and comprehensive insurance, if available.

- Vehicle insurance must indemnify the registered owners of the vehicles from and against claims related to vehicle damage and other losses due to theft, vehicle crashes, and other casualties.
- Liability coverage must protect all drivers of the vehicles and the employers of the drivers. In the case that a vehicle is titled or registered to an entity other than MGIC, MGIC must be a named insured or additional insured under the liability policy covering the vehicle.
- Vehicle insurance must include bodily injury protection, wherein the insurance covers any harm to third parties, including passengers who are not MGIC personnel.
- Liability coverage must include defense and cost of defense, without reduction of liability limits to cover cost of defense.

Transporting non-MGIC personnel

MGIC vehicles are provided first and foremost to transport staff and goods for carrying out official MGIC business. Transporting partner and community representatives is permitted but strongly discouraged. In situations where MGIC business requires transporting non-MGIC personnel, the office may want to ask those passengers to sign liability waivers, no matter how comprehensive the insurance coverage.

In the case of an external loan of a vehicle, where an [Equipment Use Loan Agreement](#) is in place between MGIC and the recipient organization (partner), the office is responsible for procuring, continuously maintaining, and paying for insurance for the loaned vehicle. In exceptional circumstances, the partner may hold that responsibility, in which case the requirement will be stipulated in the insurance provision of the [Equipment Use Loan Agreement](#)[https://somumaryland.sharepoint.com/:f:/r/sites/research_collaboration/Ciheb/MGIC Policies and Procedures/MGIC Policies and Procedures Sections](https://somumaryland.sharepoint.com/:f:/r/sites/research_collaboration/Ciheb/MGIC_Policies_and_Procedures/MGIC_Policies_and_Procedures_Sections) signed between MGIC and the partner. (For more information, see [Property transfers and disposition](#).)

Vehicle tracking systems: Vehicles should be equipped with a functioning tracking system. This is required for four-wheeled vehicles and strongly recommended for motorcycles.

Driver authorization

Only employees who are authorized drivers and hold a valid driver's license may drive an MGIC vehicle. Authorized drivers are typically individuals hired as professional drivers. Exceptions may be granted only in rare circumstances and require CD/CR approval. If the person to be authorized is the CD/CR, that person's supervisor must approve.

The DFA or their designee should review the proposed driver's driving record, obtain a copy of their valid driver's license, subject the employee to a driving test, and approve individuals in writing. Documentation of driver authorizations should be filed either in the individual's personnel file or in a file explicitly for such authorizations. These requirements apply to all authorized drivers hired directly by the country office or through an agency.

Of particular note:

- **Orientation:** New drivers should be fully oriented to the vehicles that they will drive and to the office's fleet management processes and requirements.
- **Violations:** Any driver who violates safety measures and other aspects of this policy will face discipline that may include termination of their authorization to drive and, in cases of very severe violations, termination of employment.
- **Re-authorizations:** In the instance of a vehicle crash or similar adverse event in which no MGIC policy was violated, the DFA may require that the driver go through a re-authorization process that may include another driving test.

Vehicle safety and security measures

MGIC has important requirements to ensure the safety of people in and near MGIC vehicles. It is the responsibility of the drivers to ensure these measures are followed.

- Drivers are required to abide by traffic rules and regulations, including those related to speed limits.
- Drivers are prohibited from using mobile phones and similar devices while driving, even if traffic regulations allow for that use.
- Drivers are prohibited from driving while under the influence of drugs or alcohol. No open containers of alcohol are permitted in MGIC vehicles.
- All vehicles must at all times meet the safety specifications required under local traffic regulations.
- All motorcycle riders must wear a helmet at all times.

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- Four-wheeled vehicles must be equipped with a seatbelt for each passenger seat in the entire vehicle.
- All passengers in a four-wheeled vehicle must wear seatbelts at all times when the vehicle is in motion. Passengers may not ride in the bed (load bay) of a pick-up truck.
- Vehicles should contain safety supplies, such as flares, a fire extinguisher, and a first aid kit, and any other items required by local law.
- Vehicle use should conform to office restrictions on travel after nightfall and in insecure areas, as detailed in the Country or Project Safety and Security Plan.
- In insecure environments, MGIC should educate personnel on how to handle checkpoints, roadblocks, and other activity by armed groups – see [8-Safety and Security](#).
- No firearms of any kind are permitted in an MGIC vehicle, unless the MGIC President has approved otherwise because of a high level of insecurity, in which case the type of firearm and who may carry one will be dictated.
- Smoking in MGIC vehicles is prohibited.

Right to Withdraw

All MGIC personnel have the right to withdraw from a situation that they feel poses an unreasonable level of risk, without suffering disciplinary action.

Procedures for crashes and other Safety and Security incidents

An [Incident Report Form](#) should be completed and submitted to the CD or CR and security focal point for any incident affecting the safety and security of people and/or property, **within 24 hours**. Reporting through an Incident Report Form is required even if the damage to MGIC's vehicle or another vehicle is deemed minimal.

Any crash or other incident in which a person is harmed, or a vehicle is damaged must be reported **as soon as possible to the UMB International Safety and Security Manager**.

Once notified of a crash or other safety or security incident, the CD or CR is authorized and expected to take immediate measures to ensure medical care and wellness support, personal safety, and property safeguards as appropriate to the immediate situation.

The CD/CR or SFP must also obtain a police report when possible and necessary for potential future legal or insurance requirements.

If the person responsible for the crash or damage violated MGIC policies, procedures, or codes or local traffic law, that person will be held accountable and may be disciplined up to and including termination of employment.

See [8-3 Critical Incident Management](#) for additional critical incident management procedures following the submission of an Incident Report Form.

Use management and maintenance

Vehicle and driver assignment and booking: Larger country offices should have procedures for assigning vehicles to drivers and for prioritizing and scheduling use of the vehicles.

Daily checks: At the start of their workday, drivers should carry out a routine check of their vehicle to ensure that it is safe, fit, and in good working condition and that all necessary vehicle registration and insurance documents, supplies, and equipment are on board.

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Primary usage: A vehicle procured for Project A must be used primarily for Project A purposes, i.e., booking of that vehicle must give primacy to Project A work. On the infrequent occasion when the vehicle is used for another project, this must be accurately reflected on the vehicle log.

Vehicle logs: The office is required to maintain a vehicle log for each vehicle using the [Vehicle Log](#). Drivers are required to complete the vehicle log for every trip made in the vehicle, with special attention to the following:

- State clearly the business purpose of the trip (“Reasons for Trip”)
- Indicating the project associated with that business purpose (“Award/Class”)
- Obtain sign-off/confirmation from a passenger (“Passenger’s Signature”)
- Document on the log each time the vehicle is refueled

Maintenance and fuel consumption: The DFA is responsible for having in place a process to ensure timely maintenance of the fleet of vehicles, with complete maintenance records kept on file. Moreover, the DFA is responsible for conducting a monthly analysis of maintenance and fuel costs to ensure vehicle costs are reasonable and the fleet properly serviced and cared for. That analysis should include a cross-check with data collected by the vehicle tracking system, to ensure accuracy and affirm that appropriate controls are in place.

Parking: The office should determine where its vehicles may be parked overnight, keeping in mind security from theft or damage and confining vehicle use to business purposes, unless an exception has been approved.

Use of personal vehicles for MGIC business

Offices are not required to permit use of personal vehicles for MGIC business; such use may be authorized at the discretion of the CD/CR and with whatever limitations the CD/CR deems appropriate. Similarly, the UMB IO department has the discretion to permit or disallow use of personal vehicles for MGIC business where there is no country office.

Mileage reimbursement rate: If use of personal vehicles is permitted, the MGIC office must have a set mileage reimbursement rate that the UMB department operations lead has approved, as supported by documentation on file. The rate should be reassessed on at least an annual basis, revised as required, and approved again by the head office.

Approval: Personnel who would like to use their personal vehicle for MGIC business travel must seek prior approval from the DFA. In the case of the DFA, the CD/CR must approve and in the case of the CD/CR, the supervisor must approve. The DFA should confirm that the person has a valid driver’s license and vehicle insurance coverage that meets the minimum requirements under local law.

Reimbursement: To be reimbursed for use of their personal vehicle on MGIC business, employees submit a completed [Travel Expense Report](#), as for other travel expenses. Documentation supporting the mileage presented must be attached. If a trip begins and/or ends at an employee’s residence, commute mileage (the mileage traveled routinely between one’s residence and primary worksite) may not be included in the reimbursement request.

Personal use of MGIC vehicles

MGIC vehicles are provided for conducting MGIC business. Personal use of MGIC vehicles is permitted **only in exceptional circumstances and with prior written authorization by the CD/CR and UMB department operations lead**. The procedures for arranging for personal use are:

- The employee submits a written request to the DFA.
- The DFA reviews the request and verifies that MGIC's motor vehicle insurance is applicable to the vehicle and the driver in circumstances of personal use.
- The DFA determines if the circumstances justify personal use of MGIC vehicles.
- If justified, the DFA documents the rationale and approves in writing.
- The DFA establishes a process for ensuring actual mileage driven for personal use is fully reimbursed to the country office using the same rate applicable when reimbursing use of personal vehicles for MGIC business.

If the person requesting personal use of MGIC vehicles is the DFA or the CD/CR, that person's supervisor receives the request and makes the determination. If favorable, the supervisor then documents the rationale and approval in writing.

Checklist for CDs/CRs

- ☐ Ensure MGIC vehicles are used only for business purposes, are driven only by authorized MGIC employees, and only transport MGIC personnel, official visitors, and partner and community representatives
- ☐ Require that MGIC motor vehicles are managed and operated with due concern for the financial, legal, and safety risks associated with these large-value assets
- ☐ Follow MGIC procurement policy for procuring any vehicle
- ☐ Ensure MGIC motor vehicles have all required insurance
- ☐ Reinforce the importance of MGIC personnel following all safety measures
- ☐ Ensure personnel are familiar with incident reporting requirements and submit an [Incident Report Form](#) for any incident affecting the safety and security of people and/or vehicles
- ☐ Notify the UMB International Safety and Security Manager immediately if a person is harmed or a vehicle damaged in an incident
- ☐ Require full and correct usage of vehicle logs
- ☐ Ensure documentation and procedures for vehicle and driver assignment, maintenance, fuel consumption, and parking are in place
- ☐ If permitting use of personal vehicles for MGIC business, ensure personnel obtain prior approval for this arrangement
- ☐ Only allow personal use of MGIC vehicles in exceptional circumstances and with prior written authorization by the CD and UMB department program lead

Key references

- [Equipment Use Loan Agreement](#)
- [Incident Report Form](#)
- [Travel Expense Report](#)
- [Vehicle Log](#)
- [5-15 Procurement](#)
- [8-Safety and Security](#)
- [USG Uniform Guidance](#)

3-9 Communications

Policy statement

MGIC and UMB seek to promote and tell the remarkable stories of UMB's programs to engage stakeholders and support achievement of our mission to strengthen health systems and improve the human condition. MGIC offices play an important role in this effort while also having strict responsibilities to ensure that UMB media and communications guidelines are followed.

MGIC branch and MGIC affiliate offices and property, whether owned or leased, must comply with UMB branding and signage policies. Under no circumstances may an entity unaffiliated with MGIC or UMB, including a local organization working in partnership with UMB or MGIC, be authorized to represent itself as an affiliate of UMB or MGIC, nor display UMB or MGIC signage or branding, except with the written permission of the MGIC President and UMB's Provost.

MGIC must control and monitor the use of its trademarks and branding as well as those of MGIC and UMB. These efforts ensure that rights to trademarks and brands are protected, used only in connection with approved activity, and protect the integrity and reputation of the country office, MGIC, and UMB. Furthermore, MGIC must follow any applicable sponsor guidelines for branding.

MGIC and UMB trademarks, brand, and logos may be used only for official purposes and never for personal use or gain. Any proposal to create a new or revised branded look, including a project logo, requires review and approval by the UMB department communications lead.

Any new or substantially revised website associated with MGIC programs and operations require guidance and approval from the MGIC President or designee.

Informed consent must be properly obtained from all subjects prior to use of their image, voice, or likeness in MGIC and UMB publications or other communications materials of any sort.

The country director or country representative is the only personnel authorized to make public statements on behalf of the MGIC office. However, as appropriate to the circumstances and only after consultation with the UMB department communications lead, the CD/CR may delegate that authority to other members of the leadership team.

Office communications point person

The CD/CR is ultimately responsible for communications and assigns a designated person to lead this function at all times. That person is known as the **communications point person** and may report to the CD or other senior manager in a larger country office, or the CD/CR will assume the role themselves in smaller structures. The role of the communications point person is to ensure the country office translates relevant MGIC Policy into local policies and procedures and adheres to MGIC and UMB communications standards and sponsor requirements. These include adhering to branding guidelines and obtaining informed consent prior to using people's images, voices, or likenesses.

The communications point person works closely with the UMB department communications lead, who provides communications-related guidance and otherwise supports CO communications point persons to implement the Policy while monitoring communications compliance.

Branding guidelines

Required use: MGIC is the legal, official in-country representative for UMB projects it implements, and the MGIC name and branding must be used for all official administrative communications related to MGIC legal and business operations. MGIC and UMB logos may both be included in certain circumstances, such as on business cards and MGIC forms, but not for employment agreements and procurement-related documents such as contracts. The UMB department communications lead provides guidance on the size and location of these logos.

Project brands: A sponsor may require that UMB create its own project brand, which are official sub-brands. These require approval from the MGIC CD/CR and UMB department communications lead to ensure cultural and contextual appropriateness prior to implementation. They may be used for program-related materials such as:

- Promotional materials (e.g., pens, notebooks, hats, laboratory coats)
- Signs for offices and project sites
- Signs on vehicles
- Banners and posters
- Labeling of commodities that the country office supplies in health facilities
- Newsletters, reports, and other program-related publications

Logo requirements: All logos must be used as provided, without translation and without alterations to the relation between elements, color, fonts, or relationships scales (no stretching or squashing). Furthermore, logos must not be minimized to a level that makes them illegible.

Sponsor requirements: Sponsors' branding guidelines should be known to the CD/CR, program managers, and the communications point person and be applied whenever required. A legal licensing contract may be required for use of sponsor logos, in which case this requirement should be fulfilled prior to using the sponsor logos.

Partners' use of branding/logo: Partners shall not be permitted to recreate MGIC/UMB brands or alter existing MGIC/UMB brands under any circumstances.

Authorities: The CD/CR, supported by the communications point person, leads on MGIC branding initiatives in-country and clears any proposed branded looks, branding guidelines, style guides, and social media handles. Authorities are distributed as follows:

- The communications point person may clear basic branding matters.
- The CD/CR clears high-profile external communications such as annual reports, newsletters, and more complex communications.
- The CD/CR approves any exceptions to the branding guidelines.
- The UMB department communications lead approves external signage at MGIC sites.
- The UMB department communications lead approves any new or substantially revised website.

Ciheb projects: Country offices that only implement UMB Ciheb projects should follow the Ciheb Brand Guidelines, available on the [Ciheb SharePoint site](#), and use the templates provided for branded materials, such as stationery letterhead, email signatures, and slide decks. Sponsor/partner branding will need to be added as relevant. Additional resources are available from the UMB department communications lead.

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Project completion or closure of MGIC office: CDs and CRs are responsible to ensure that UMB and MGIC signage and logos are removed from all MGIC and partner facilities, websites, vehicles and other equipment, and print materials at the conclusion of MGIC activity, unless prior approval has been obtained from the MGIC President and UMB Provost for signage and logos to remain in use. For example, such approval may be provided when a UMB or MGIC-branded building is an intended deliverable of a sponsored project.

Photo/video consent guidelines

MGIC offices should ensure photo and video procedures and consent guidelines reflect local law and custom, while also fulfilling the MGIC and UMB requirement to obtain informed consent prior to using individuals' images, voices, or likenesses.

- Photographs and videos taken by personnel while on duty are the copyright and property of the country office.
- The images, voices, or likenesses may only be used for MGIC educational or research use or other non-commercial use.

The [Photo and Video Consent Form](#) is completed and signed by each individual (subject) whose image, voice, or likeness might be used in MGIC and UMB publications or other communications materials of any sort.

- If the subject is a child (under the age of 18), the parent or guardian of the child must sign the release.
- If the child is 10 years old or older, both the parent/guardian and the child need to sign the release.
- If the subject is illiterate, personnel must read the consent statement aloud to the subject and a literate witness must sign the form and check the box "Literate Witness."
- If the subject does not speak the language used on the form, personnel may verbally translate the consent statement into another language to obtain informed consent.

At their discretion, offices may translate the form into languages commonly used in their operational context. A copy of any translated [Photo and Video Consent Form](#) should be submitted to the communications point person.

Social media use

Social media provides country offices with opportunities for enhancing the impact of programs and research as well as the reputation of MGIC and UMB.

All posts should align with and support the mission of helping to strengthen health systems and improve the human condition. Personnel are prohibited from posting or liking or sharing personal messages or political messaging in support of a party or candidate on all official UMB or MGIC platforms. If questions related to this prohibition arise, the social media manager should consult with the UMB department communications lead for guidance.

Only the CD/CR and communications point person are authorized to post on social media accounts. No financial, confidential, sensitive, or proprietary information about MGIC, UMB, partners, or personnel may be posted.

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Engagement with international, national, and local media

The CD/CR or a leadership team member serving as delegee as permissible under this Policy may make public statements and otherwise engage with the national and local media at their discretion. Media coverage can help bolster the country office's visibility and reputation far into the future. However, managing the contact requires care to avoid misstatements or errors that, once said, are difficult to correct.

Engagement with international media is a high-level public relations function. However, media contact may initially occur at any staff level. Personnel who are contacted by international media in the field or at the office should politely ask for the media representative's contact information and indicate that an appropriate representative will contact them to respond to their request for information. Personnel should not answer questions themselves. Instead, they should help facilitate cooperation and responsiveness by asking the media representative:

1. What is the reporter's name and the name of the publication?
2. What is the story about and what kinds of information are being requested?
3. Do they have specific questions they want to ask?
4. What is their deadline for responding to questions for the story they are writing?

All answers should be recorded, and the communications point person should be immediately notified of the media contact, who in turn will inform the CD and seek further guidance from the UMB department communications lead. Personnel should never say, "No comment." Instead, they should inform the media representative that "the appropriate person from our office who is able to answer the questions accurately will be in contact with you."

When an interview is arranged with the media, the communications point person and UMB department communications lead can prepare talking points and brief the MGIC representative who will be interviewed.

For appropriate handling of intellectual property and copyrighted materials, see [Research data, Intellectual Property, and Copyright](#) under 3-3 Legal Affairs.

Checklist for CDs/CRs

- ☐ Ensure there is a designated person – the communications point person – to lead communications and ensure the country office adheres to MGIC/UMB guidelines
- ☐ Follow MGIC branding guidelines and clear any proposed new or revised branded looks, logos, branding guidelines, style guides, and social media handles with the proper authorities
- ☐ Have procedures in place to properly obtain informed consent from individuals whose images, voices, or likenesses may be used by MGIC/UMB
- ☐ Engage with the UMB department communications lead regarding the communications strategy, including any media strategy
- ☐ Coordinate with the UMB department communications lead before accepting interviews with representatives of the international media

Key references

- [Photo and Video Consent Form](#)

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- [3-3 Legal Affairs](#)
- [7-5 Acceptable Use](#)
- [Branded Documents library](#)
- [Ciheb SharePoint site](#)

3-10 Confidentiality and Data Security

Policy statement

By the nature of UMB's programs and research, MGIC possesses **sensitive data**, defined as any personal, confidential, and legally protected information. This includes personally identifiable information (PII) associated with patient and study participant data. Confidentiality is particularly important for protecting the privacy of individuals' healthcare information, including their HIV status.

The [MGIC Code of Ethics and Professional Conduct](#) requires that all personnel not use or disclose confidential and proprietary information relating to the activities or business affairs of MGIC and UMB, except as may be necessary in carrying out MGIC duties and collaborating on program implementation and research with partner organizations. This includes not disclosing information about MGIC and UMB processes, inventions, fundraising strategies, and funding proposals, all of which are the sole property of MGIC or UMB.

Individuals who become aware that sensitive data (including confidential information) has been shared or otherwise divulged contrary to confidentiality obligations in [2-2 MGIC Code of Ethics and Professional Conduct](#) should immediately notify their supervisor and the CD/CR, preferably in writing, and/or report the data breach through the [Ethics Hotline](#).

At the time of hire, personnel must sign a [Data Confidentiality Agreement Form](#). Employee misuse of confidential information and/or the systems in which the information is stored constitutes a serious breach of job responsibilities and will result in disciplinary action up to and including termination of employment.

Country offices must lay out context-specific processes and procedures for limiting access to and securely storing records that contain personal, confidential, proprietary, and sensitive information. These must protect sensitive data from loss of integrity and confidentiality, in compliance with local laws and sponsor requirements. See [7-4 Data and Systems Security](#) for guidance on establishing and maintaining secure IT systems and processes.

Protecting confidentiality and privacy

The CD/CR is responsible for ensuring that personnel have a basic understanding of their responsibilities to protect and safeguard the confidential information and sensitive data to which they have access as a result of their employment.

Maintaining security of sensitive information is one of UMB and MGIC's most important responsibilities. MGIC leadership is accountable for ensuring the office safeguards sensitive information and strives to do so by:

- Limiting access to sensitive information to individuals on a “need to know” basis and for the sole purpose of carrying out MGIC activities
- Emphasizing the importance of confidentiality and privacy through a combination of training, operating procedures, and IT security that is systematically enforced
- Strictly adhering to relevant local laws and guidelines to protect sensitive information
- Continually updating and testing MGIC IT resources to improve protection of sensitive information
- Maintaining current, accurate employee records and ensuring that only current MGIC and UMB employees, not former employees or any unaffiliate organization personnel, have permissions to access MGIC databases, systems, and servers, except with the written approval of the MGIC President.

See [2-2 MGIC Code of Ethics and Professional Conduct](#) for more information on expected behaviors, reporting requirements, and prohibition against retaliation.

See [7-4 Data and Systems Security](#) for detailed requirements associated with username and password security, file security, remote access, anti-virus management, data/systems backups, disposition of IT equipment, and terminating access upon employee separation.

Developing data security procedures

The MGIC office is responsible for consulting local legal counsel and/or regulatory bodies as to the laws that apply to confidentiality and data security and to address local legal requirements. Office procedures should cover limiting access to and securely storing records that contain personal, proprietary, or sensitive information. These procedures must include the following:

- Paper records containing sensitive or confidential information, which special attention to PII, must be kept in locked files such that only authorized personnel have access to them.
- Electronic records containing sensitive or confidential information must be stored on secure servers.
- In general, sensitive, and confidential data, especially PII, should not be stored on portable devices, including but not limited to smartphones, external hard drives, and USB thumb drives. PII should only be stored on portable devices when required for programmatic activity, such as conducting a research survey.
- Devices that are known to or may contain sensitive or confidential information shall be handled in ways that protect their contents, using locked storage and other approaches described in [File security](#) below.
- Programmatic records that contain personal or proprietary information should be marked as confidential and maintained securely.

File security

MGIC files and documents must be stored in MGIC offices, on MGIC- or UMB-owned IT equipment, and in MGIC or UMB online repositories. For additional guidance, see [7-4 Data and Systems Security](#).

Personnel who are assigned to work outside of an MGIC office – including remote workers, personnel embedded in other institutions, and in other non-traditional office structures – must have an approved data and file security plan that is subject to periodic inspection and revision by UMB Central Administration and UMB Funding Unit(s) as needed to safeguard MGIC’s and UMB’s information.

If personnel have a legitimate need to share electronic files that contain sensitive data, it is strongly recommended that they use the UMB secure file transfer system. (See [7-4 Data and Systems Security](#) for details.) Sending files via email is advised only for an occasional data-sharing need, in which case the email must be encrypted.

Personnel should strive to reasonably safeguard protected information from intentional or unintentional disclosure by implementing a mechanism to encrypt information and implementing procedures that verify that a person or entity seeking access is the one claimed.

Further, MGIC recommends the exclusive use of MGIC-managed email accounts for MGIC-related business and that personnel refrain from sharing sensitive data on personal email accounts and peer-to-peer file sharing platforms.

When it is necessary to access sensitive data, MGIC personnel must safeguard the information and never leave it unattended.

Individuals who become aware that sensitive data has been shared or otherwise divulged contrary to the [MGIC Code of Ethics and Professional Conduct](#) should immediately notify their supervisor or another manager, preferably in writing, and/or through the [Ethics Hotline](#), which provides a confidential and anonymous reporting mechanism.

Checklist for CDs/CRs

- ☐ Ensure the country office safeguards sensitive data by limiting access, emphasizing importance of confidentiality, strictly adhering to local laws and guidelines, and continually updating and testing MGIC IT resources to improve protection
- ☐ Establish and document specific processes and procedures for protecting confidential and sensitive data
- ☐ Ensure personnel understand their responsibility to protect and safeguard confidential information and sensitive data
- ☐ Monitor that files and documents are stored in MGIC offices, on MGIC- or UMB-owned IT equipment, and in MGIC or UMB online repositories, or in authorized remote employees' homes and duty stations as subject to periodic inspection.
- ☐ Require use of measures such as encryption and password protection when sensitive data must be shared electronically

Key references

- [Data Confidentiality Agreement Form](#)
- [2-2 MGIC Code of Ethics and Professional Conduct](#)
- [7-4 Data and Systems Security](#)
- [Ethics Hotline](#)

3-11 Record Retention and Access

Policy statement

This MGIC Policy applies to all records, which encompasses any documentary material made or received in connection with MGIC activity, including clinical records. It covers paper records, electronic records, reports, or data in other media.

MGIC offices and teams must have record retention controls in place that protect MGIC records containing personal, confidential, proprietary, or sensitive information (**sensitive data**) from loss of integrity, confidentiality, or availability. These controls must comply with sponsor, UMB, and applicable government requirements.

MGIC records must be retained and protected for the longest period required by the sponsor, by UMB, and by applicable government laws. Offices must follow the MGIC record retention schedule and have documented record-retention and disposition procedures.

Upon closure of an MGIC office, all records that are still in the retention periods described below must be delivered to UMB's International Operations department in electronic format.

Electronic vs. hard copies

In compliance with U.S. government (USG) requirements ([2 CFR 200.333](#) and thereafter in the [USG Uniform Guidance](#)), MGIC should collect, produce, and store records in electronic formats whenever practicable. MGIC will also handle paper records (hard copies) of the country office's own records or documents provided by subrecipients, partners, sponsors, and others, and should have standards and procedures for both electronic and hard-copy records.

In the case of hard-copy documents that are more than three years old and unless otherwise dictated, the office may substitute electronic versions made through scanning or other forms of electronic media. After confirming the quality of those electronic versions, the office may then dispose of the hard copies. The office should have in place reasonable safeguards against alteration and should conduct periodic quality control reviews of the substitute documents.

When original records are electronic and cannot be altered, there is no need to create and retain paper copies.

Retention schedule

All MGIC offices should follow this procedure for establishing a country-specific retention schedule:

1. Use the [Record Retention Schedule](#) as a starting point.
2. Consult with local legal counsel to ensure any additional requirements established by local law are reflected in that schedule
3. Send the proposed schedule to the UMB department administrator for review
4. Once finalized, disseminate the record retention schedule

Note: Records must be retained for whatever period is longer – that determined by UMB or MGIC, by the sponsor, or by local law.

Storage of records

Original records maintained by a physical office should be in lockable, fire-resistant, and secure storage at the office or a convenient and secure off-site storage location.

Electronic records should be kept on secure UMB data platforms or on an MGIC-procured platform approved by UMB's Central Administration IT department, and not on third party services unless required by host government or sponsor.

Storage of hardcopy records at UMB can be arranged in the event of termination of a program, closure of a country office, unavailability of suitable off-site storage, or other circumstance.

Retention period for lease, insurance, agreement, and license records

Agreements and licenses – including but not limited to purchase orders, independent contractor agreements, vendor agreements, insurance contracts, insurance policies, space leases, and software licenses – must be retained during the term of the license or agreement and subsequently for the longer of (a) four years after termination, expiration or non-renewal of the license or agreement, (b) a longer retention period required by an award to UMB, or (c) a longer retention period required by local law.

Retention period for personnel records

All employment, pension, and benefits records concerning any person employed by the country office must be retained by the country office throughout the person's employment and for four years after an employee's date of separation from employment, or for a longer retention period if required by local law.

Retention of programmatic records

The office is responsible for retaining programmatic records unless otherwise advised by the UMB department program lead.

Retention of records of correspondence with legal counsel, auditors, and accountants

Records of correspondence with legal counsel, auditors, and accountants should be maintained indefinitely by the office.

Access to records

Internal requests: Authorized officials from UMB must be able to access records at the MGIC office upon request.

External requests: Copies of, or access to, MGIC records may be requested by other parties, such as auditors, sponsors, local government agencies, media, and persons relying on U.S. government information laws. An office should refer all such requests to the MGIC VP – Policy & Administration and UMB department administrator and should not make records available without their authorization.

Personnel records requests: If an MGIC employee or former employee requests a copy of the employee's own personnel records and the records are deemed to have sensitive material therein, the office may wish to consult the UMB department operations lead and/or local legal counsel prior to providing records.

Disposition of records

Unless otherwise directed by an MGIC or UMB official with authority regarding disposition of records, the MGIC office should discard, destroy, or otherwise dispose of records whose retention period has expired. Records should not be retained longer than required.

- **Exception related to open audit or legal matters:** Any records related to an outstanding audit or audit issue or related to a legal proceeding must be retained past their expiration date until the audit or legal matter has been fully resolved and in consultation with the UMB department administrator.
- **Exception related to programmatic records:** MGIC must seek the approval of the UMB department program lead prior to disposing of programmatic records.

When disposing of records, MGIC should consider confidentiality and the inclusion of personal information in the records. These records containing **sensitive data** require special measures to protect that data from loss of integrity, confidentiality, or availability.

- Paper documents containing personal, proprietary, or confidential information may be shredded using a cross-cut shredding device.
- Electronic records or computer equipment or other media containing sensitive data must be disposed of in ways that securely eliminate remnants of the records. [See 7-4 Data and Systems Security](#) for details.

Prior to destroying sensitive records or a large volume of records, MGIC offices should consult the UMB department administrator to ensure the proposed timing and method are aligned with record retention and disposition requirements.

Checklist for CDs/CRs

- ☐ Implement controls that protect personal, confidential, proprietary, or sensitive data from loss of integrity or confidentiality
- ☐ Retain and protect records for the longest period required by the sponsor, by UMB, and by the applicable government laws
- ☐ Maintain a country-specific record retention schedule that has been reviewed by local legal counsel and approved by the UMB department administrator
- ☐ Maintain indefinitely correspondence with legal counsel, auditors, and accountants
- ☐ Purchase and use lockable, fire-resistant storage cabinets or containers, or lease equivalently secure storage space
- ☐ Make records accessible to the head office upon request; refer external requests to the MGIC VP – Policy & Administration or UMB department administrator for authorization
- ☐ Properly destroy records after the retention period unless otherwise directed by an MGIC or UMB official

Key references

- [Data Confidentiality Agreement Form](#)
- [Record Retention Schedule](#)
- [7-4 Data and Systems Security](#)
- [USG Retention Requirements for Records](#)
- [USG Uniform Guidance](#)

3-12 Closing MGIC Offices

Policy statement

As per [1-5 Establishing and Operating Through Affiliates \(Country Offices\)](#), the MGIC Board of Directors is solely authorized to close MGIC offices.

The closure of a country office or a field sub-office within a country requires thoughtful planning and execution by the country leadership team and the UMB department operations and program leads, with extensive consultation with the department of International Operations and other relevant UMB Central Administration offices. MGIC and UMB require the formulation of an exit strategy and preparation of a close-out plan three to six months prior to the contemplated date of closure, if circumstances permit. Even in instances where a rapid close-out must be executed, a close-out plan with key actions, assignment of responsibilities, and timeline is required.

Close-out plans must reflect sponsor guidelines and requirements as well as MGIC and UMB requirements pertaining to program, personnel, offices, property, and other operational matters. They must be formally approved by the UMB department administrator prior to the start of implementation, and the MGIC President or designee must be kept aware of progress.

Upon closure of an MGIC office, all records that are still in the retention period described in [Section 3-11](#) above must be delivered in electronic format to the MGIC President in care of the UMB department of International Operations. Similarly, UMB and MGIC signage and logos must be removed from facilities, vehicles and equipment, and materials unless the MGIC President and UMB Provost have given permission for signage and logos to remain in use. For example, such approval may be provided when a UMB or MGIC-branded building is an intended deliverable of a sponsored project.

Any proposal to terminate MGIC's legal presence (registration) in the country where a country office is closing requires explicit MGIC Board of Directors approval. Deregistration or changing an active registration to a dormant registration will be led by the department of International Operations (IO) on behalf of the MGIC Board of Directors, and will require active involvement by the CD, DFA, and other senior CO personnel and UMB department operations lead, as requested by IO.

If MGIC chooses to keep MGIC's registration active in a country, the MGIC Board of Directors as delegated to the department of International Operations will be responsible for maintaining that active registration status.

For information on suspension or closing of operations because of a rising threat level, see [8-4 Modification, Suspension, and Closure of MGIC Operations](#).

Procedures

An office or sub-office close-out may occur when a stream of funding concludes, when MGIC transitions programs to a qualified partner, when MGIC concludes research or programming in a region of the country, when insecurity rises in the work environment, and for other reasons. Whatever that reason, the office needs to develop an exit strategy that seeks to sustain the gains that MGIC and partners have made in strengthening health systems and improving the human condition, while also mitigating risk to MGIC and UMB.

The exit strategy is documented in a **close-out plan** that should be developed collaboratively with UMB personnel as appropriate – typically, the MGIC VP – Policy & Administration, UMB department program lead, UMB department operations lead, UMB department administrator, UMB department communications lead, and regional and global MGIC staff as appropriate.

The close-out plan for a **country office** should specify the roles and responsibilities of those who will manage the close-out process. The plan itself should cover all aspects of operations and, at a minimum, the following topics:

1. **Image and reputation**, with an emphasis on how to maintain good standing with personnel, partners, and communities throughout the process and minimize security threats
2. **Program transition and close-out**, including partnership plans and sponsor reporting
3. **Personnel transitions**, including maintaining staff morale, assisting with obtaining follow-on employment, and preparation for separations, including final payments to employees
4. **Operations**, including termination of leases and of local services and disposition plan for equipment, supplies, materials, and other assets
5. **Financial affairs**, including cancelation of contracts, closure of accounts, reconciliations, reporting, and, if applicable, transfer of operational and personnel costs to other projects
6. **Award management**, including the final evaluation, final report, and approval of the disposition plan for capital assets
7. **Subaward close-outs**, including collecting all required submissions from subrecipients
8. **Record retention and storage**, including protection and safeguarding of confidential information and sensitive data

A close-out plan for a **sub-office** should cover all of the above topics that are applicable to the circumstances.

Additional close-out guidance may be found in other MGIC Policies and Procedures, notably:

- [4-20 Separation from Employment](#)
- [Property transfers and disposition](#) in 3-7 Property Management
- [Sanitizing IT equipment before disposition, reuse, or repurpose](#) in 7-4 Data and Systems Security
- [Establishing, changing, and closing bank accounts](#) in 5-11 Bank Accounts
- [Award close-out](#) in 6-2 Award Management
- Subaward close-out [6-7 Subaward Audits and Close-Outs](#)
- [Disposition of records](#) in 3-12 Record Retention and Access
- [Protecting confidentiality and privacy](#) in 3-11 Confidentiality and Data Security

Checklist for CDs/CRs

- ☐ Develop a close-out plan for closing a country office or sub-office three to six months prior to expected closure, if circumstances permit
- ☐ Collaborate closely with head office in creating close-out plans and seek HO approval prior to implementation

Key references

- [1-5 Establishing and Operating Through Affiliates \(Country Offices\)](#)
- [3-7 Property Management](#)
- [3-11 Confidentiality and Data Security](#)
- [3-12 Record Retention and Access](#)
- [4-20 Separation from Employment](#)
- [5-11 Bank Accounts](#)
- [6-2 Award Management](#)
- [6-7 Subaward Audits and Close-Outs](#)
- [7-4 Data and Systems Security](#)
- [8-4 Modification, Suspension, and Closure of MGIC Operations](#)