



Waganakising Odawak
Little Traverse Bay Band of Odawa Indians
Accounting Department
7500 Odawa Circle • Harbor Springs, Michigan 49740
Phone 231-242-1440

Policy and Procedures for Non-Local Travel

- I. **Introduction:** This policy establishes the Non-Local Travel (Travel) Policy and Procedures for the Little Traverse Bay Bands of Odawa Indians Tribal Government (LTBB). Sound policies and internal controls are necessary to:
 - A. Protect the assets of LTBB by reducing the risk of exposure to fraud and misappropriation of funds.
 - B. Ensure LTBB puts forth a good faith effort to secure the most economical rates possible.
 - C. Ensure expenses have been authorized by the appropriate LTBB personnel and have been incurred by LTBB or directly by the traveler under an LTBB Governmental Program. No expenditures will be made to reimburse items that would have otherwise been the responsibility of another person or organization unless authorized under an LTBB Governmental program.
 - D. Ensure funds are used solely for authorized purpose.
 - E. Ensure adherence to Generally Accepted Accounting Principles (GAAP) as prescribed by the Governmental Accounting Standards Board (GASB); regulations as outlined in the *Code of Federal Regulations, Title 2; Subtitle A Chapter 2 Part 200 OMB Uniform Guidance: Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards (2 CFR 200)*; the LTBB Administrative Procedures Statute and any other applicable Federal, Tribal or Granting Agency rules, regulations and procedures.

- II. **Definitions:**
 - A. Allowable Costs: Costs that are necessary, reasonable, allocable to a fund, permitted under a program, and are adequately documented.
 - B. Personnel, Staff or Employee: For purposes of this document, unless otherwise stated, personnel, staff or employee means any person compensated through the payroll office, including but not limited to enterprise employees falling under Executive oversight, Tribal Councilors, Tribal Chairperson, Tribal Vice-Chairperson, Commissioners, Board Members, Election Board Members and regular governmental employees, temporary workers and interns of all branches.
 - C. Standard Workday: For purposes of this document the term standard workday for most governmental employees is defined as Monday through Friday, from 8:00 a.m. to 5:00 p.m., with an hour for lunch.
 - D. Local Travel: Travel where the final destination is 50 miles or less, one way, from the LTBB building the employee normally works in, by following the shortest reasonable route by car.
 - E. Travel or Non-Local Travel: Travel where the final destination is more than 50 miles, one way, from the LTBB building the employee normally works in, by following the shortest reasonable route by car.

- F. **Business Expenses:** Expenses incurred to carry out the normal work of the employee. Such expenses must be reasonable, necessary and allowable.
 - G. **Travel Advance:** Check issued to traveler prior to traveling upon timely request for funds to cover anticipated costs reasonably estimated based on known information.
 - H. **Travel Closeout:** Form filed by traveler upon return of travel documenting actual costs incurred, deducting any advance received, resulting in a balance due either traveler or LTBB.
 - I. **Travel Report:** Form or statement signed and filed by traveler upon return of travel documenting there was a bona fide business purpose for the travel. Forms may vary by branch or division, but must include a certification by the traveler of the bona fide business purpose.
- III. **Applicability:** This policy is applicable to all Executive Branch employees and commissioners and to any branch or division of the Little Traverse Bay Band of Odawa Indians Tribal Government (LTBB) not having their own documented travel policy that follows all Generally Accepted Accounting Principles (GAAP) as prescribed by the Governmental Accounting Standards Board (GASB), regulations as outlined in *Code of Federal Regulations, Title 2; Subtitle A Chapter 2 Part 200 OMB Uniform Guidance: Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards* and any other applicable Federal, Tribal or Granting Agency rules, regulations and procedures. If another branch or division has an approved Travel Policy, they should follow said policy. If that policy is found lacking necessary requirements per the authorities listed above, the requirements in this policy may be adhered to. This policy applies to all travel more than 50 miles from the LTBB building the employee normally works in, by following the shortest reasonable route by car. Travel 50 miles or less should be reimbursed under the LTBB Local Travel Policy. Travel is only reimbursable if an employee is required to travel to conduct official business for LTBB.
- IV. **Consistency:** To maintain consistency in standards for effective control over, and accountability for, all funds, property and other assets, as required in *2 CFR 200*, this Non-Local Travel Policy will apply for all applicable travel expenditures as determined above, regardless of funding source.
- V. **Policy:** It is the policy of LTBB to process allowable and authorized travel on a scheduled and timely basis while seeking the most economical rates possible, without providing an unnecessary hardship to the traveler. The Non-Local Travel Policy for LTBB is an Accountable plan as defined by the Internal Revenue Service (IRS) in Publication 15. Amounts paid for reimbursement or allowance under an Accountable Plan are not wages and are not subject to income, social security, Medicare and other taxes. If any expenses normally covered under this Non-Local Travel Policy are not substantiated in a reasonable period of time, are in excess of substantiated amounts, or required receipts are not submitted, the amount paid to the employee is treated as paid under a non-accountable plan and therefore is subject to income, social security, Medicare and other taxes. All travel must meet the following rules and exceptions can only be granted by the persons having authority over affected the branch or division:
- A. Work time is time spent actively traveling to and from destinations (actively being in transit) and actively attending meetings or conferences.
 - B. Reservations for transportation, lodging, and registrations will be completed by authorized LTBB staff.

- C. Employees must submit completed travel requisitions a minimum of 15 business days prior to departure date for air travel and a minimum of 10 business days prior to departure for non-air travel. If discounts are offered for registrations or lodging, the travel request must be entered at least 5 business days prior to the discount expiration.
- D. Employees must have paid or incurred deductible expenses while performing services as employees in their authorized capacity. The reimbursements must be paid for the expense and not be an amount that would have otherwise been paid by the employee. Additional travel costs for family or friends is not allowable. Additional travel costs for extending stays for personal reasons is not allowable.
- E. Employees may not be reimbursed for commuting expenses, entertainment expenses, alcohol, airline upgrades, or additional transportation costs for personal reasons while on site.
- F. Employees must substantiate expenses to the Accounting Department within a reasonable period of time.
- G. Employees must return any funds received in excess of substantiated expenses within a reasonable period of time.
- H. Generally the most economic method of travel will be chosen, both for national travel when choosing between airlines, airports and flight choices, and for regional travel when determining if airline, car rental or direct mileage reimbursement will be chosen. If any two methods or flights fall within a very close range of each other, reasonable and prudent employee preference or convenience may also be considered. If one method or flight is clearly more economical and does not place a hardship on the employee that option will be chosen or reimbursement cannot exceed the most economical option. Prices for comparison of costs should be obtained between 15 and 60 business days prior and attached to the travel request. Rates not falling within that range may not be reflective of the charges LTBB would pay. Employees with medical requirements affecting their mode or duration of travel must have documentation from a medical professional on file when making travel arrangements.
- I. If an employee cannot attend travel due to valid events beyond their control they must give their supervisor and the Accounting Department immediate notice, via the proper cancellation form if possible, so LTBB can attempt to cancel arrangements and seek refunds if possible. If an employee fails to give notice or chooses to not travel of their own accord without supervisor authorization they may be responsible for all costs incurred by LTBB. Cases will be reviewed and a determination made by the persons having authority over the affected branch or division.
- J. If an employee is on travel and needs to change pre-approved travel arrangements due to unforeseen events, effort must be made to contact their supervisor and the Accounting Department to determine if alternative arrangements are reasonable. If the changes are approved the traveler may be reimbursed for allowable expenses, as listed below.
- K. All restrictions from the funder of the travel must be followed. If a funding agency specifically does not allow an expense, that item is not reimbursable to the traveler, whether LTBB would normally allow it or not. Allowable travel expenses per LTBB policy are listed below:
 - 1. Employees will be reimbursed a Meals and Incidental Rate (M&IE), often referred to as "Per Diem" on an hourly basis, as rounded to the nearest hour. Time from 1 to 29 minutes past the hour will be rounded backwards to the current hour. Time from 30 minutes to 59 minutes will be rounded upwards to

the next hour. As LTBB utilizes the M&IE reimbursement method, actual costs for meals are not reimbursable. The hourly M&IE rate is calculated by using the most current M&IE rates as provided by the United States General Services Administration (GSA) for the location the employee will spend the night divided by 24 hours. Employees are entitled to an hourly reimbursement for actual hours they are on authorized travel. The M&IE must be reduced per the GSA M&IE Breakdown Chart by any meals offered at an event, paid for by LTBB or as a result of LTBB incurring a charge. If an employee cannot partake of an offered meal for approved and documented reasons their M&IE may not be reduced. The Incidentals portion of the M&IE covers fees and tips given to porters, baggage carriers, hotel staff and staff on ships. Therefore these items are not reimbursable elsewhere.

2. Mileage is reimbursable from the work location or home, depending on the point of departure, to the travel destination, airport, boat dock or other transportation station, via the shortest reasonable route at the current IRS mileage rate. Employees from the same department attending the same event and leaving from nearby destinations shall carpool unless special circumstances are present. If travelers are unwilling to carpool each driver's mileage will be reduced by \$0.20 per mile. If a tribal vehicle is available and not used mileage will be reduced by \$0.10 per mile. Mileage must be rounded to the whole mile.
3. Fuel for rental cars and tribal vehicles is reimbursable with receipt.
4. Baggage Fees for the first bag is reimbursable with receipt. If travel requires an employee to be gone for more than seven consecutive nights a second bag is allowable.
5. Dry Cleaning or Laundry if the employee is gone four nights or more. Receipt or other documentation is necessary.
6. Computer, Printer, Copier and Internet access charges if access is required for job duties is reimbursable with receipt. If an employee has a cell phone issued by or reimbursed by LTBB, which has mobile hotspot capability then internet charges will not be reimbursable.
7. Phone calls to work and one phone call home for employees who do not have a cell phone issued by LTBB or reimbursed by LTBB are reimbursable.
8. Bridge Fares & Highway Tolls if deemed necessary for traveling the most reasonable route are reimbursable with receipt.
9. Parking Fees are reimbursable with receipt if free parking is not available. Tips to parking attendants and valets are not allowable.
10. Car Service, Taxi and Shuttle Fares and related tips to and from airport or training location is reimbursable with receipt. Fares to restaurants are not allowable if a restaurant is near the hotel. Fares to entertainment or shopping are not allowable. Subway and Bike Rental fees are reimbursable with receipt, if shown to be an economical method of transport.
11. Lodging costs are allowable if necessary and the most economical rates are booked at a suitable location. Employees must submit requests in time for room block rates to be utilized. If a room block rate cannot be obtained, or a similar price at a nearby hotel is not available, additional approvals for travel may be required. Non-traditional methods of lodging may be utilized when it demonstrates an economic savings without an employee hardship. Additional approvals are necessary for non-traditional methods of lodging.

Employees should only book their own rooms in emergency or pre-approved situations. In emergency situations the employee must make every possible effort to contact their Supervisor and Accounting for approval of any charge. They must obtain the most economical arrangements possible. Failure to do so may result in the charge not being allowable or reimbursable. If the charge is determined to be allowable, employees must present a receipt and they may be reimbursed at the rate the employee was charged for the room. If the room is within the State of Michigan the employee must let the hotel know they are on official travel, should provide the desk clerk the LTBB Tax Identification number and should tell the desk clerk they should not be charged state sales tax. Failure to do so may result in LTBB not reimbursing any state sales tax the employee incurs.

12. Airfare costs are allowable if necessary and the rates offering the best overall value to LTBB are booked on a suitable flight. It is the policy of LTBB to book flights at least 15 days prior, but no more than 60 days prior to the travel date, to ensure a good rate is received without incurring unnecessary risk of cancellations due to staffing or scheduling issues. If staff request a certain flight and it appears to not be attainable or the best value, they will be contacted by their Staff Accountant to review options. First-Class or luxury travel is generally not allowed. Employees should only book their own airfare in emergency or pre-approved situations. In emergency situations the employee must make every possible effort to contact their Supervisor and Accounting for approval of any charge. They must obtain the best value possible. Failure to do so may result in the charge not being allowable or reimbursable. If the charge is determined to be allowable, employees must present a receipt and they may be reimbursed at the rate the employee was charged. Direct booking runs the risk of the charge not being allowable or reimbursable per LTBB policies. As such, employees incur these expenses at their own risk.
 13. Car Rental costs are allowable if necessary and justified. The LTBB car rental form must be submitted. Employees should only book their own car rental in emergency or pre-approved situations. In emergency situations the employee must make every possible effort to contact their Supervisor and Accounting for approval of any charge. They must obtain the most economical arrangements possible. Failure to do so may result in the charge not being allowable or reimbursable. If the charge is determined to be allowable, employees must present a receipt and they may be reimbursed at the rate the employee was charged. Direct booking runs the risk of the charge not being allowable or reimbursable per LTBB policies. As such, employees incur these expenses at their own risk.
 14. Ferry Fare is reimbursable with receipt if such travel was required and was the most economical way to reach the destination.
- L. Associates of LTBB traveling for LTBB business may be reimbursed under a programmatic documented accountable plan. If no such plan exists the LTBB non-local travel policy is in effect.
 - M. Programs offering travel for program participants may reimburse expenses up to, but not exceeding, those in this document, provided their reimbursement policy is documented prior to the event occurring.

- VI. **Procedures:** For travel to be considered allowable these steps must be followed:
 - A. Travel Approval

1. Executive Employees, including Enterprises with Executive Oversight: Travel for employees of the Executive Branch must be approved by the Director or authorized supervisor of the Department. Travel for Department Directors must be approved by the Direct Services Administrator as applicable or the Chairperson or designee. Travel for employees of enterprises with Executive oversight must be approved by the Manager of the enterprise. Travel for the Manager of an enterprise must be approved by the Chairperson or designee.
 2. Commission and Board Members: Travel for members of Boards and Commissions must be approved by the Chairperson or Vice-Chairperson of the Commission and the Chairperson's Office.
 3. Election Board: Travel for members of the Election Board must be approved by the Chairperson of the Election Board. Travel for the Chairperson of the Election Board must be approved by the Vice-Chairperson of the Election Board.
 4. Prosecutor: Travel for all Prosecutor Office staff must be approved by the Prosecutor Office Manager. Travel for the Prosecutor Office Manager must be approved by the Prosecutor.
 5. Tribal Court: Travel for all Tribal Court employees, interns and justices must be approved by the Tribal Court Administrator. Travel for the Tribal Court Administrator must be approved by the Chief Judge. Currently Tribal Court follows the Tribal Court Travel Policy.
 6. Tribal Councilor travel must be approved by the Legislative Leader, the Treasurer or the Legislative Office Manager. Currently Tribal Councilor travel follows the Legislative Branch Travel Policy.
- B. Required documents must be submitted for the individual requesting travel and approved by the individual with appropriate oversight as listed above.
1. Per Diem must be verified on a travel closeout form, showing actual authorized time left and actual time returned. Total hours will be multiplied by the applicable M&IE rate. If employees, due to personal preference, leave earlier or return later than necessary, per diem will not be paid for the extra hours.
 2. Mileage must be verified with a printout such as MapQuest, rounded to the whole mile and total miles listed on a travel closeout form. If employees, due to personal preference, take longer, alternate routes, mileage will not be paid for the extra miles.
 3. Baggage Fees must be listed on the travel closeout form and a receipt attached.
 4. Computer, Printer, Copier and Internet access charges as required for job duties are reimbursable with receipt. If an employee has a cell phone issued by or reimbursed by LTBB, which has mobile hotspot capability then internet charges will not be reimbursable.
 5. Phone calls charged to the hotel room are allowable as follows: to work and one daily to home IF employee does NOT have a cell phone issued by or reimbursed by LTBB only.
 6. Bridge Fares & Highway Tolls are reimbursable with receipts if necessary for the shortest route.
 7. Parking Fees are reimbursable with receipt if free parking is not available. Tips for parking attendants or valet service are not reimbursable.
 8. Car Service, Taxi and Shuttle Fares including a reasonable tip must be verified with a receipt signed by the driver or credit card receipt. Currently

some funders, such as the Department of Justice, do not allow tips. Subway Fares and Bike Rental fees are reimbursable with receipt.

9. Lodging costs are reimbursable with receipt. The traveler is responsible for getting a receipt upon checkout for all lodging arrangements, whether paid direct by LTBB or by the traveler, as receipts will not be accessible by LTBB after checkout.
 10. Airfare paid directly by LTBB does not require the traveler to submit documentation. If employees are authorized to directly pay airfare it is reimbursable with receipt.
 11. Car Rental, if authorized, is reimbursable with receipt. The traveler is responsible for turning in the receipt to LTBB with their travel closeout.
 12. Ferry Fare requires a receipt.
- C. Traveler's Responsibilities:
1. Employees must enter their travel request into Microix, the Purchasing Division of the Accounting Software as a purchase requisition. Each traveler must be entered as a separate purchase requisition. All requests must be entered into Microix with the proper information of the hotel, conference registration and airline details, and approved by their supervisor, at least 15 business days prior to the first day of travel. Travel not requiring an airline must be entered at least 10 business days prior to the first day of travel. If discounts are offered for registrations, Department Directors should ensure the travel request be entered at least 5 business days prior to the discount expiration.
 2. Vendor Name: Leave this blank
 3. Description Box must clearly state:
 - a. The name of the traveler
 - b. The word "Travel"
 - c. The city and state
 - d. The name of the hotel if known
 - e. The title of the conference or meeting
 - f. The dates leaving and returning (not the conference dates)
 4. Individual line items must be entered for each of the following:
 - a. Hotel
 - b. Airfare
 - c. Car Rental or Shuttles
 - d. Registrations
 5. If a Travel Advance is requested, individual line items must be entered for each of the following:
 - a. M&IE hourly rate (Per diem)
 - b. Mileage
 - c. Taxi Fare
 - d. Baggage Fees
 6. Special Instructions/Comments section should include:
 - a. Hotel information including phone number, address, code for any room discounts and deadlines for such discounts.
 - b. Registration information such as online address and details such as deadlines and dates. If registration is free employees are asked to register themselves to reserve their spot as early as possible.
 - c. Details on dates and times requesting to travel.

- d. Flight preferences such as departure time and airport. Please note these are only preferences and LTBB will make the most economical choice per travel policies above.
 - 7. Reason/Justification section should state how the travel aligns with grant goals if applicable.
 - 8. Attachments
 - a. Hotel website or flyer showing info
 - b. Event agenda or flyer/announcement
 - c. Car Rental Justification form if applicable
 - d. Funding Agency approvals if applicable
 - e. Fully completed Emergency Processing Request form if travel is submitted past deadlines.
- D. Advances and Closeouts:
- 1. Estimated costs for mileage, per diem, fuel, parking, baggage fees, ground transportation and bridge fare may be advanced if desired by the traveler. The traveler must submit a complete request in Microix, including all necessary documentation. It must be approved and submitted to Accounting by the supervisor at least 10 business days before scheduled departure. Checks will be available the last business day prior to the departure day, unless an earlier date has been requested in advance.
 - 2. If a traveler has outstanding travel that has not been closed out and a balance due remains unpaid, new travel advances will not be issued until the balance is paid.
 - 3. Advances must be closed out within 30 days of returning from travel or the full amount of the travel advance may be deducted from the traveler's paycheck.
 - 4. If travel is closed out and a balance of more than \$5 is due to the traveler a check will be issued on the next scheduled check run. If the amount due is \$5 or less payment will be held until the end of the quarter or when other payments to the individual net \$5 or more, whichever comes first.
 - 5. If travel is closed out but a balance is due LTBB, the balance must be paid within 5 days of the closeout or the amount due may be deducted from the traveler's paycheck or other reimbursements.
 - 6. Employees are responsible for closing out all travel, whether an advance was received or not, and repaying any balance due to the Accounting Department within 30 days. Failure to closeout travel within 60 days, even if an advance was not received, may result in a freeze on future travel.

VII. **Conflicts of Interest:** When making travel arrangements and processing travel closeouts, no employee, as defined above, may participate in the payment process if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, any member of his or her immediate family, his or her partner or an organization that employs any of the above has a financial or other interest, or could appear to receive a tangible personal benefit from the payment or transaction. Failure to adhere to this conflict of interest policy may result in disciplinary action per the employee handbook. Potential conflicts of interest shall be disclosed to funding agencies when required.

VIII. **Internal Control Standards:** To comply with 2 CFR 200.303, Internal Controls, LTBB follows the guidance in "Standards for Internal Control in the Federal Government" issued by the Comptroller General of the United States and the "Internal Control Integrated Framework", issued by COSO. This document lists five standards of

Internal Control: Control Environment, Risk Assessment, Control Activities, Information and Communications, and Monitoring. To ensure compliance with the Risk Assessment Standard and the related continual changes in regulatory and operating conditions, the CFO will review this policy no less than annually and update as needed.