



Waganakising Odawak
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Policy and Procedures for Local Travel

- I. **Introduction:** This policy establishes the Local 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, loss, theft and misappropriation of funds.
 - B. Ensure LTBB puts forth a good faith effort to pay funds due in a reasonable time.
 - C. Ensure expenses have been authorized by the appropriate LTBB personnel and have been incurred as part of an LTBB Governmental Program. No expenditures will be made to reimburse expenses that would have otherwise been the responsibility of another person or organization.
 - D. Ensure funds are used solely for authorized purposes.
 - 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.

- 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, than the LTBB building the employee normally works in, by following the shortest reasonable route by car.

- III. **Applicability:** This policy is applicable to all employees, as defined above of all Branches, Divisions and Departments of the Little Traverse Bay Band of Odawa Indians Tribal Government and government run Enterprises, referred to as LTBB in this document. This policy applies to all local travel, as defined above. Travel more than 50 miles should be reimbursed under the LTBB Travel policy.

- IV. **Consistency:** To maintain consistency in standards for effective controls and accountability as required in 2 *CFR* 200, this Local Travel Policy and Procedures will apply for all funds spent by LTBB regardless of funding source.
- V. **Policy:** It is the policy of LTBB to reimburse allowable and authorized local travel on a scheduled and timely basis. The Local Travel Reimbursement 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 expenses normally covered under this 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. Reimbursements must meet the following rules under IRS guidelines:
- A. Employees must have paid or incurred deductible expenses while performing services as employees. The reimbursements must be paid for the expense and not be an amount that would have otherwise been paid by the employee.
 - B. Employees must substantiate expenses to the Accounting Department within a reasonable period of time.
 - C. Required Documents, as determined by Accounting must be signed by the individual requesting reimbursement and the person with appropriate oversight.
 - D. Employees must return any funds received in excess of substantiated expenses within a reasonable period of time.
 - E. Employees may not be reimbursed for commuting expenses, or other expenses to travel from a personal location to a work location. Employees may not be reimbursed for personal travel during a break period. Travel is only reimbursable from one LTBB building to another, or from an LTBB building to a non-LTBB building if travel is necessary to carry out the goals and duties of the department.
 - F. The most current Standard Mileage Rate as issued by the IRS will be utilized.
- VI. **Procedures:** To ensure LTBB has accurate records, adequate internal controls and sound policies for the reimbursement of local mileage are necessary.
- A. Allowable Expenses:
 - 1. Mileage will be reimbursed at the current IRS rate upon submission of a fully completed Mileage Reimbursement Form to Accounts Payable. Each leg of each trip must be documented individually and fully with odometer readings.
 - 2. Bridge Tolls and Parking Fees will be reimbursed upon submission of a receipt and an approved Check Requisition to Accounts Payable.
 - 3. Tips for valet parking are not reimbursable.
 - 4. Food expenses are not reimbursable under Local Travel Procedures.
 - 5. Employees traveling 50 miles or less one way from their normal work location are not eligible for Per Diem even if they choose to stay overnight. The only exception to this rule would be for LTBB business occurring on an island, where having the employee leave the island daily would be cost prohibitive due to ferry or airplane costs and it is in LTBB's best interest for the employee to stay overnight. If the employee does not stay overnight but is on the island for 10 hours or more, per diem may be paid at an hourly rate. This will require a travel closeout form and a signed memo from the director and the employee, as well as approval from the head of the government branch or division the employee works for, as defined above.

- B. For mileage to be considered necessary, valid and reimbursable all employees must obtain written approval as listed below:
1. Executive Employees, including Enterprises: Local travel for employees of the Executive Branch must be approved by the Director or other authorized supervisor of the Department. Local travel for Department Directors must be approved by the Direct Services Administrator or Vice-Chairperson as applicable. Local travel for employees of enterprises with Executive oversight must be approved by the Manager of the enterprise. Local travel for the Manager of an enterprise must be approved by the Chairperson or designee.
 2. Commission and Board Members: Local 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: Local travel for members of the Election Board must be approved by the Chairperson of the Election Board. Local travel for the Chairperson of the Election Board must be approved by the Vice-Chairperson of the Election Board.
 4. Prosecutor: Local travel for Prosecutor Office staff, including the Prosecutor, must be approved by the Prosecutor Office Manager. Local travel for the Prosecutor Office Manager must be approved by the Prosecutor.
 5. Tribal Court: Local travel for all Tribal Court employees, interns and justices must be approved by the Tribal Court Administrator. Local travel for the Tribal Court Administrator must be approved by the Chief Judge.
 6. Tribal Council: Local travel for all Legislative Office staff must be approved by the Legislative Leader, the Treasurer or the Legislative Office Manager. Local travel for the Legislative Office Manager must be approved by the Legislative Leader or the Treasurer.
- C. Reimbursements will be processed under the normal Accounts Payable procedures by submitting required forms with all the proper signatures and account numbers, provided the expenditure is allowed by the funding source.
- D. Reimbursement requests will be due by the 10th day of the month following the month the expenses were incurred in. Requests turned in late may be subject to rejection, as the funding source may have expired.

VII. **Conflicts of Interest:** No employee may approve, enter data or 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 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.