

TRAVEL & EXPENSE (T&E) REIMBURSMENT

FINANCE POLICY
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I. POLICY INTRODUCTION

A. Overview

LCSNW, which will also be referred to as "the agency", has a long history of connecting people in need with services that enrich their lives. It is the duty of our organization and by extension, our employees to serve our clients while maintaining their dignity and upholding the ideals and requirements of LCSNW and its affiliates. Whether it is for directly serving our clients or by empowering our employees in their service, LCSNW incurs necessary expenses to ensure that we are honoring our commitments.

Expenses incurred for business purposes will be reimbursed to individual employees via expense reimbursement or, in certain cases, the employee will be provided with a temporary card to cover required expenses as they occur. Purchase cards will be issued to districts for the purpose of covering expenses specific to district use or for other expenditures at an amount that could not be provided by a preferred vendor or covered by individual employees.

LCSNW covers a 3-state area across multiple offices requiring travel on behalf of LCSNW. Whether by plane, train, auto and/or boat, travel connects us with donors, funders, clients, and employees allowing us to deliver our mission of health, justice, and hope.

LCSNW reimburses these travelers for necessary and reasonable business expenses incurred while traveling. Reimbursable expenses must conform to federal and state law and the restrictions placed upon sponsored projects. LCSNW requires travelers to complete and submit an expense report, which must be approved, and documents the business purpose of the trip and the types of expenses incurred. Expenses charged via corporate card must be reconciled.

Please note that all T&E expenditures come with a deep caution, as they easy invitations for negative press and ethics probes. Press reports tarnish the reputations and futures of not-for-profit and/or governmental agencies and/or personnel who improperly or excessively use resources for luxuries or to enhance their financial or personal interest. In order to prevent misuse of funds, LCSNW would like to remind employees that all expenses are also subject to review by the agency's Fraud, Waste, and Abuse Committee.

To avoid negative press and the consequences of misuse, here are the general rules for our T&E policy:

- Charge something to the agency if you are ok seeing the charge in the press, in the news, on the internet, in social media, presented before committee, or found by auditors.
- Do not charge something to the agency if you do not want to see it exposed.

Remember, what goes on social media or the internet stays there.

B. Reason for Policy

LCSNW's comprehensive travel and expense policy:

- Ensures that LCSNW and any person traveling in association with LCSNW comply with the Internal Revenue Service regulations that define the types of expenses that can be reimbursed without being counted as taxable income.
- Ensures that travel charged to sponsored projects conforms to the regulations and restrictions placed on the use of the funds by the sponsor.

- Enables LCSNW to protect its reputation and not-for-profit status by avoiding excessive or inappropriate spending.
- Provides departments with the ability to control how their budgets are expended.

C. Primary Governing Policy

This policy primarily responds to the regulations of the U.S. Internal Revenue Service, the rules established by the agencies and entities that grant funding to LCSNW, and the federal and state laws that govern not-for-profit organizations. In general, federal grants have the highest threshold for expenditures, outlined in Title 2 Coded of Federal Regulations (CFR 200). This policy also creates consistency across the agency; every program and employee has the same rules.

As with any other expenditure, T&E expenditures that reflect reasonable, fair, and appropriate use of agency resources for program, clients and further development of the agency's mission will be paid or reimbursed.

- Reasonableness is assessed by the value that would ordinarily be paid for like services by a similar agency under similar circumstances
- Fairness is assessed by determining whether the item expensed is worth the amount charged to the agency
- Appropriateness is any expense defined as necessary for the business

D. Accountable Expense Policy as Defined by the IRS

LCSNW adheres to the IRS' Accountable Expense approach to reimbursement of expenses. This allows employees to not be taxed on expenses incurred for business purposes and holds the agency responsible for accounting for expenses rather than the employee accounting for expenses on his or her taxes.

To be an Accountable Expense Plan and avoid taxing employees:

- 1. All expenses incurred must have a legitimate and documented business connection
- 2. Employees need to account for expenses within a reasonable period
 - a. IRS defined as 60 days after the date the expense was incurred
- 3. Any excess reimbursement or allowance must be repaid within 120 days of the date incurred

Any employee who claims an expense or uses an agency T&E card is subject to the provisions of the IRS Accountable Expense rules.

II. OVERALL EXPENSE REPORT POLICIES

A. Timing

The IRS Regulations stipulate that expenses be submitted within a "reasonable" time. Best practice is to submit expenses in Concur semi-monthly by the 15th and last business day of each month.

For employee expense reports, LCSNW enforces the "reasonableness" of submission as follows:

All expenses must be submitted in Concur within the month the expense was incurred

For agency card and purchase card usage:

 More than one month of unsubmitted agency credit card or district purchase card expenses may result in revocation or suspension of the card

Board members and volunteers have 60 days from the date the expense was incurred to submit expense reports.

Expenses Not Submitted Within 60 Days of the Date Incurred:

- Out of pocket expenses will not be reimbursed
- Agency credit card will be canceled
- After 120 days, any unsubmitted expenses on an agency card will be deducted from payroll. The employee will also be recommended for disciplinary action up to termination of employment.

B. Subcontractors' and Independent Contractors' Expense Reimbursement

LCSNW only reimburses for employees, certain volunteers, and Board members. Subcontractors whose wages are paid and reported by another firm on a W-2 or the Independent Contractors (IC) who are paid through a Personal Services Agreement (PSA) on a 1099-MISC are expected to use the expense reimbursement process of their employer or as a self-employed business.

LCSNW will reimburse for Subcontractor or IC expenses costs if permitted in the subcontract or PSA, respectively, and as invoiced with receipts provided. All rules apply.

C. Required Documentation

To be an Accountable Expense Plan, an employee or member of the board of directors who has incurred business-related expenses needs to complete an expense report. LCSNW policy for documentation required with an expense report adheres closely to IRS regulations and to Federal Contracting requirements.

Employees are required to file expense reports in Concur.

 Board of Directors and volunteers eligible for reimbursement report on a standard paper expense report form.

Every expense must:

- 1. Identify each individual business expense
 - a. Do not group expenses
- 2. Explain the business purpose for each expense
 - a. Write descriptions imagining an auditor with no agency knowledge is reading it
 - b. Avoid using abbreviations, use full names of locations, programs, employees, etc.
 - c. Avoid using special characters or symbols in the description
- 3. Be supported with invoices/receipts for all expenses totaling \$25.00 and above
 - a. All tips, tolls, and reimbursed mileage amounts must be supported
 - b. All receipts must be itemized, as signed credit card charge slips alone are not adequate supporting documentation.
 - c. If a receipt is lost, the employee must contact the merchant to request a new copy. Most merchants are able to provide a new copy of a receipt upon request.
- 4. Identify for all meals:
 - a. Names, titles, organizations, and business relationships of all persons attending
 - b. The business purpose of the meal or other business event (topics discussed, etc.)
 - Cost reimbursement contracts, may require a copy of the agenda and notes of the event
- 5. Provide the itemized invoice or receipt for all travel related expenses including airfare, lodging, and meals
- 6. Mark as "personal" any inadvertent personal expense charged to the agency card
- 7. Be accurately coded and allocated in Concur, including account, district, program, and revenue source
- 8. Out of Pocket reimbursements over \$250 and P-Card purchases over \$500 must have prior approval. Form is available in the Forms Library on the Finance Intranet Page.
- 9. Reminder that client assistance forms are required for all client assistance regardless of the payment method. Form is available in the Forms Library on the Finance Intranet Page

D. Expense Payment Options

LCSNW offers three means to pay for T&E expenses that employees incur:

- Reimbursement to the employee upon satisfactory completion and supervisory approval of an expense report ("Out-of-Pocket")
- Agency credit card with the satisfactory completion and supervisory approval of an expense report supporting the agency credit card activity
- Purchasing card held by an administrative staff member with the satisfactory completion and supervisory approval of an expense report supporting the agency purchase card activity

E. Agency Credit Cards

Agency Credit Card Policy

LCSNW has a corporate card program with its bank through which employees can charge business travel and expenses. LCSNW pays the balance owed on the card to the bank, thereby reducing the cash demands on our employees to support agency costs.

As an agency-paid and managed card, only employees with a specific need have an agency credit card. An agency credit card is only intended to facilitate payments for travel and hospitality expenses, online purchases, and paying for client assistance. They are not for agency subscriptions or routine operating expenses.

Agency T&E cards are issued through the LCSNW's primary bank and are authorized for use by employees for agency purposes only. In order to request an agency credit card, an employee must complete a request form and sign a credit card agreement.

Supervisors can request a temporary agency card for an employee through a completed request form. Form is available in the Forms Library on the Finance Intranet Page.

Allowable use of Agency Credit Cards

Agency cards are primarily designated for specific business related use and are never to be used for personal expenses.

The following are allowable uses of the T&E credit card:

- 1. Actual travel costs such as airline tickets, hotel stays, car rentals, gas for the rental car, and restaurant meals while traveling
- 2. Meals outside of the office for business meetings
- 3. Training and conference attendance costs
- 4. Books and publications
- 5. Gas and maintenance for agency owned vehicles
- 6. Meals for staff gatherings, meetings, and office events
 - a. Staff gatherings must be work-related. Moral and team building events are allowed, provided all other guidelines are met.
 - b. Staff events are for staff only. Costs that include family members are not allowed. If a family member cost is accidentally included in a credit card transaction, it must be itemized and marked as "personal".
- 7. Programmatic purchases for clients as authorized in contracts for client support and welfare. Program expenses should be for the program to which the card was issued only. District jurisdiction.

Temporary Agency Credit Card

LCSNW offers a temporary agency credit card with a low limit for employees who have planned travel and for whom expense report reimbursement would be an undue financial burden. The limit is set low to cover expected out of pocket costs. Employees given a temporary card will be asked to surrender the card once travel is completed.

Agency Credit Cardholder Agreement

LCSNW employees who qualify for an agency credit card are listed below.

Employees will receive an agency card upon receipt of an agency credit card agreement signed by the employee and the manager.

- Executive
- District Director
- Shared Services Directors
- Associate District Director
- Program Director

- Program managers who buy for clients
- Executive Assistant
- Development personnel who travel, plan events

Any manager or staff member who believes a credit card is essential for performance of his or her duties should submit a request to **expenses@lcsnw.org**. Remote employees with occasional travel due to being a remote are not granted credit cards.

Credit Limits for Agency Cards

Finance sets credit limits based on the expected use for travel and incidentals. Key things to keep in mind:

- District purchase cards are expected to be used for non-travel and larger purchases.
- Credit limits can be adjusted upward temporarily to support a single-event travel need
- Requesting a temporary increase starts with a request form and each request needs to specify
 the reason for the limit increase, justification of the increase amount, and time frame over
 which the increase will be used. Form is available in the Forms Library on the Finance Intranet
 Page.
 - o For questions pertaining to temporary increases please email to expenses@lcsnw.org

F. Expense Reimbursement Requirements

Employees who expect reimbursed expenses and employees with agency credit cards need to know the following:

- Each expense has to be reviewed by a direct supervisor and approved in Concur. Accounting also reviews and approves all expense reports.
 - O No one can approve their own expense requests

- Approval of expense reports can only be completed if the expense report is itemized, includes
 appropriate proof of payment, and is coded correctly. It is the responsibility of the supervisor to
 thoroughly review each employee's expense submission. Final approval is by the LCSNW
 Accounting team.
- Reimbursements will only be paid after approval by both the supervisor and accounting team.
- Reimbursements are processed via payroll twice per month (10th and 25th). Employees will see "Employee Reimbursement" on their pay statements, please note this is informational only. It will not be included in wages on employee W2s.
 - LCSNW cannot make out of cycle reimbursements or pay through any other method
 - Out of Pocket expenses can be submitted twice a month. To allow time for review and approval the suggested time frame is as follows:
 - Expenses from current month 10th to 24th, submit on the 25th to allow review and approvals by 1st of the next month and will be in the paycheck on the 10th.
 - Expenses from 25th of the prior month to the 9th of the current month, submit on the 10th to allow time for review and approvals by the 16th and will be in the paycheck on the 25th
- Expenses reimbursed or paid through the agency credit card or purchasing card and later found to be inappropriate due to lack a business purpose tied to LCSNW or an expense charged for personal gain will be deducted from the employee's future pay
 - The employee will be subject to discipline up to and including termination of employment.

III. Travel Policy

A. Reimbursable Travel

"Travel" is a general term encompassing any cost associated with an employee working at a location other than the LCSNW office or home office. Types of costs include, but are not limited to, mileage, air or train fare, mass transit fare, meals, hotel stays, parking, tolls, and rental cars plus fuel. Mileage reimbursement is the most common type of travel expense. All travel must have a business need.

Travel Within a District (Intra-District Travel)

Our employees travel within their service location most commonly to support programs and clients. Routine travel within a service area, especially mileage reimbursement, should only be done with the knowledge and endorsement of the employee's supervisor. A supervisor approving expenses in Concur authorizes the travel time, locations (entered by each trip's starting and ending address), and the amount calculated within Google Maps by the current IRS mileage reimbursement rate.

Travel Within LCSNW's 3-State Area (Intra-Agency Travel)

Our agency serves clients in three states, and the people we serve get indirect value when our leaders meet in person.

The following are pre-authorized Intra-agency travel reasons:

Employee's role	Intra-agency travel	Pre-approval and expense tips
Staff through Associate Director	 Cross-district service support Training (e.g., Emerging Leaders) 	Written, pre-approval required from a manager or higher with accountability for the budget being charged
District Director, Shared Services Director	 Leadership meetings and retreats Cross-district service support In-person meetings when necessary Advocacy 	Budgeted cost = approval
Executives	Directors' list plus:SupervisionStaff and management support	
Board of Directors	Scheduled Board meetings at Board- approved location	Pool resources when practicalStaff pay whenever practical

Out of State Travel (Outside of LCSNW's 3-State Area)

Representing the Agency outside of LCSNW can further the mission and encourage employee development and connection.

Employee's role	Out of state travel	Pre-approval and expense tips
Staff through Associate Director	Training and conferencesAdvocacy	Written, pre-approval required from the employee's up-line District Director, Shared Services Director, or Executive (for staff reporting to an Executive)
District Director, Shared Services Director	Training and conferencesAdvocacy	Written, pre-approval required from required from the employee's executive
Executives	Directors' list plus:NetworkingStrategic initiatives	If budgeted, notification to CEO If CEO, notification to Executive Team for coverage
Board of Directors	Scheduled Board meetings at Board- approved location	Pool resources when practicalStaff pay whenever practical

B. Cost Considerations for Travel

As a not-for-profit organization, we strive to use the best means to travel and pool resources whenever possible.

LCSNW uses the following guidelines for paying travel and entertainment costs:

Expenditure type	LCSNW pays	Unallowable or Traveler pays
Airfare	 Lowest, non-refundable coach class Baggage fee for 1 checked bag or 1 carry-on bag (as applicable) Change fees when due to changes in business plans > \$750 tickets where there are 2 quotes obtained 	 Upgrades Cost of flight insurance Personal legs of a trip even if it serves a business purpose Airline club access or membership > \$750 tickets when there is only 1 quote obtained

Hotel	Standard room Internet access Midsize or smaller; if	 Suites or other upgraded rooms In-room movies Spa or fitness access/services
Rental car	carpooling, size that suits the number of passengers) Truck, van for hauling SUV when weather conditions warrant	● Luxury or other upgrade
Add on charges to rental cars	No add on charges except for another driver, who is an LCSNW employee	 Insurance (LCSNW's policy covers) Full fuel option GPS car seat unless transporting children
Fuel for cars	 Refueling a rental car Fuel for an Agency vehicle used for programmatic purposes only 	See mileage for use of personal vehicle.
Coffee shops and snacks	 1 reasonably priced drink and food at normal meal times Reasonably priced drinks and food to support a meeting of business associates and colleagues 	 Additional and non-meal time drinks and snacks while traveling Frequent meetings at coffee or snack shops with only internal staff
Meals and food	3 regular meals during days of travel; meals are reimbursed at actual cost.	Alcoholic beverages
Gratuities	Reasonable gratuities for: Baggage handling Hotel housekeeping Ride-sharing or taxi drivers	Excessive gratuitiesRoom service gratuities
Laundry while traveling	Reasonable cost of hotel laundry service or in-hotel laundry if: Traveling more than 7 consecutive business days Luggage is lost more than 1 day while traveling	 Laundry costs when travel does not cross over a weekend

Long Distance Calls	 Cost of calling card for the trip (preferred) Business-related and 1 call per day to family using hotel phone (discouraged) 	 Excessive personal calls on a hotel phone Unused calling card fees
Other Entertainment	 Reasonable group activities for training and/or team building 	Solo sightseeing or other entertainmentFitness

Over Weekend Stays

An employee who chooses to stay in a travel location beyond the business needs will pay for the costs of the personal portion of the trip. To qualify as a business expense, over weekend stays must be preapproved by the executive responsible for the budget being charged. As a guideline:

- 1. The start of "business" travel and costs should be when the trip would commence and end if the extra stay were not occurring.
- 2. LCSNW will reimburse the cost of 1 night of hotel and reasonable meals when it is clearly demonstrated that returning on a Sunday or departing on a Saturday is less costly than the cost of the extra day.
- 3. If an employee chooses to stay the extra day, LCSNW will not pay for sightseeing or other entertainment costs.

Spouse/Partner Travel

LCSNW's policy adheres to IRS guidelines that would result in taxable activity to the employee and to the agency. LCSNW will not reimburse any employee or board member for separate travel costs (airfare, meals, etc.) associated with his/her spouse or partner. The cost of a shared hotel room need not be allocated between employee/director and spouse/partner for purposes of this policy.

C. Volunteer Travel and Business Entertainment

Since tax law can be convoluted, LCSNW wants to ensure that reimbursements, and especially entertainment, cannot be classified as wages. If a volunteer or business entertainment related expense is shown to be a substitute for compensation, then unplanned tax costs could be levied on the people who benefited.

Guideposts for volunteer travel and business entertainment:

- 1. Reimbursements to volunteers should be specified in the contract or in Board policy
- 2. Volunteer costs outside of contractual or programmatic-mandated volunteerism are not reimbursed and the agency does not give out receipts in lieu of reimbursement

a. As volunteers, tracking and reporting are the volunteers' responsibility.

D. Mileage Reimbursement

LCSNW reimburses mileage according to IRS Accountable Plan regulations. Mileage reimbursements generally follow the standard federal rate currently in effect, as published each year by the IRS. Changes in the standard federal rates will generally become effective at the beginning of a calendar or fiscal year. By claiming mileage, an employee acknowledges full reimbursement for the cost of personal vehicle use.

Nearly 100 scenarios arise covering mileage reimbursement. The IRS does not permit reimbursement of normal, commute mileage, even if that mileage includes doing business during the commute or stopping on the way into the office.

Here is an example on how to calculate mileage:

Home to the LCSNW office is 5 miles and home to the client is 15 miles therefore the amount that could be claimed is 10 miles (15 minus 5 commute miles) which means total miles to be reimbursed equals 10 miles each way.

Mileage reimbursement is made when all of the following are provided: [update for Concur – entering address start-end (minus commute miles?]

- Time/date of the transportation
- Start Address (from office), End Address for each leg (excluding home to office leg) Miles will be calculated
- Agency purpose reason for the trip

In order for the expense report to be approved, all of the above must be provided and the mileage description needs to say "minus commute miles" so the accounting department can confirm that mileage was calculated correctly.

E. Other Travel Expense Considerations

Mixed Personal and Business Expenses (i.e., TSA Precheck)

Some expenditures are incurred for the convenience of the agency and the employee. Examples include TSA Pre-check and passport fees. LCSNW will not reimburse these costs as the employee has benefit from the expenditure outside of the agency use.

Alcohol as Travel and Business Entertainment

Federal contracting guidelines do not reimburse the agency for purchased or consumed alcohol as a matter of course. It is LCSNW's policy not to reimburse for alcoholic beverages of any form. Employees who purchase alcohol at a meal can have the establishment generate separate receipts for reimbursable food and un-reimbursable alcohol.

IV. NON-TRAVEL EXPENSES

A. Recognition (Gift) Guidelines

Employees

Employee recognition is a sticky area, as the agency does not wish to create potential tax consequences for staff. Anything non-monetary given to employees that is not directly used in their daily job responsibilities is considered recognition; some common examples are holiday, thank-you, birthday, anniversary, or retention gifts. Recognition is an "unallowable" expense (meaning LCSNW cannot bill funders). However, reasonable and de minimus recognition can be reimbursable by LCSNW. As stated at the beginning of this policy, all programs have the same rules. This includes funds granted specifically for Retention, those funds may not be spent on extravagant employee gifts. Programs receiving funding for retention must spend the retention funds per all LCSNW policies rules and guidelines.

Other forms of recognition are managed by the HR team. The Employee Gratitude Program provides an opportunity for employees to receive milestone gifts. For monetary recognition/retention, discuss with the HR team.

Volunteers

LCSNW refrains from giving recognition to volunteers and this can easily be considered wages. Meals and events to thank volunteers are allowed.

B. Prospective and Active Donor Entertainment and Gifts' Guidelines

It is expected that entertainment expenses will be incurred to encourage relationships between the Agency and existing or prospective donors. Gathering around food and sharing a meal promote connectedness and goodwill. Giving thank you gifts for a generous donation expresses gratitude for support and can foster a longer-term relationship.

The image the agency portrays in entertainment and gift giving expenses is profound. The optics of the entertainment and gift need to match the agency, what we do, and for what we stand. Therefore, the agency's policy is to always put first and in the forefront the best and highest use of donor funds. Reasonable and humble entertainment are acceptable ways to express a relationship with a potential donor, sponsor, board member or other party who may be affiliated with the agency. IRS Guidelines stipulate what is a "reasonable" business expense for entertainment and what is taxable as a "perk."

Please consult with the Accounting Team for guidance on gifts and entertainment before an event or gift is given for assistance.

Guideposts for gifts and entertainment:

- 1. Common sense if it feels extravagant, it likely is
- 2. Avoid expensive multi-course dinners especially with multiple rounds of alcohol
- 3. Pricey events where there is significant distraction and noise that interferes with personal interaction
- 4. Pricey events that are private or selective invitations should be avoided
- 5. Venues and locations that project an image inconsistent with the agency's mission or purpose
- 6. Gift cards may be taxable as wages to the recipient; avoid gift cards

C. Gift Cards

Employees

The IRS considers gift cards to be a cash equivalent – regardless of who issues the card. Therefore, any gift card from LCSNW to an employee constitutes taxable income to the employee. Payroll adds the gift card amount to the employee's W-2 income.

- LCSNW permits gift cards to be given to employees provided the amount is taxed to the employee and LCSNW pays employer taxes and other fringe costs.
- Any gift cards given need to accompany the name(s) of recipients and the amount each recipient received. If name(s) are not provided, the gift cards will be taxed to the purchaser.

Volunteers

LCSNW refrains from giving gift cards to volunteers due to the tax impacts and costs to track and report them as income. If the sum of an amount given to a volunteer – in any form – exceeds \$600, LCSNW must report the total amount paid to the IRS. LCSNW does not use gift cards as a means to reward or thank volunteers.

Program Beneficiaries

Because of tax and federal guidelines that are costly to administer, LCSNW eschews giving gift cards to program beneficiaries.

D. Client Assistance and Support Payments

Financial support of clients may be a core part of a program, an expectation from contracting parties and the community, and/or donor-restricted funding for specific needs. We act with compassion when assisting a client in the midst of a crisis. We also promote long-term health and hope by encouraging clients to move toward independence and away from reliance on crisis support. This policy exists to provide guidelines, guardrails, and means of support for offering and paying client assistance.

Four primary factors guide decision to offer support to a client or client's family:

1. Contractual requirements. These are explicit in contracts and/or regulation. In these types, contracts or regulations often dictate what, when, how much and reasons to provide client support.

- 2. Donor restrictions. Your district's finance partner can assist in determining the kind, amount and timing of support available.
- 3. Community expectations and relations. Depending on the sources of funding and the community or client needs, determining who receives financial support and for what support is given are key elements of an effective client assistance program and policy.
- 4. Emergent and clinically-dangerous client situations. Our clients suffer often not only with mental health needs, but other drivers like economic stressors that create hopelessness and despair can become crises.

This policy addresses client assistance by the type of obligation LCSNW has to provide financial support to clients. The intention is to address the most common types of assistance, not all assistance can be prescribed and rules-based. Judgment and experience plus financial accountability for client assistance programs are the foundation of this policy.

General Policy for Client Assistance and Support

The following applies to all client assistance support payments:

- 1. All Client Assistance payments, including routine and recurring, can only be accomplished via a completed and properly approved Client Assistance Form.
- 2. Programs support staff are accountable for managing and ensuring there is available funding before communicating support to the client.
- 3. Assistance is paid based on an escalating approval, depending on the circumstance. Incomplete approvals will delay client assistance.

Any person who willingly avoids adhering to this policy will be removed from eligibility to request client assistance and be subject to disciplinary action, up to and including employment termination.

Client Assistance and Purchasing Cards

Ideally, all client assistance should be routed through Accounts Payable for payment. LCSNW acknowledges situations occur where another payment method is necessary. Purchasing cards are the second most preferred means of paying client assistance. Personal cards or Out of Pocket is extremely discouraged.

A signed Client Assistance Form is required before a purchase is made. The signed form must be submitted in Concur with the receipt. The P-card custodian/manager and ultimately the district director is responsible for ensuring proper documentation.

The CFR 200 standards are applied to all our cost reimbursement contracts, thus a signed Client Assistance Form is required, regardless of the payment method.

E. Other Non-Travel Expense Considerations

Memberships (i.e., Costco, Amazon Prime)

Each district office can have a Costco membership and an Amazon Prime account through which procurements can be made by employees. Use of these memberships to be managed by district managers.

LCSNW will not reimburse any employee for their personal membership at membership warehouses (e.g., Costco or Sam's Club) even if the agency benefits occasionally.

IT Equipment

All IT purchases must be made by the IT department. This includes hardware, software, and related accessories.

Supplies and Other Costs

LCSNW has many preferred vendors to purchase office and program supplies. Supply purchases on credit cards should be minimal if at all. High dollar purchases, such as office furniture or bulk food orders for programs, should always be purchased from a vendor and invoiced through Accounts Payable. Also remember that high dollar purchases are also subject to competitive bidding requirements.

Home Office Costs for Remote Workers

LCSNW has embraced remote work for many employees. Remote work is a privilege. Employees that work remotely are responsible for their own home office. Standard IT needs (monitors, keyboard, etc.) may be procured through a request to the IT department. These items are property of LCSNW and must be returned to the agency upon termination of employment. Normal office supplies (pens, paper, etc.) may be picked up from LCSNW office locations or procured through Staples. Other items (desks, printers, etc.) are costs of the employee. In short, no home office costs should be paid on agency credit cards or submitted for out of pocket reimbursement.

V. REMEDIES FOR IMPROPER ACTIVITIES

Expense Report Rejection

Incomplete or incorrect expense reports will be sent back to the employee. Employees will receive a notification in Concur if an expense report is sent back. The employee must resolve the issue and resubmit the expense report. This will result in late processing of the report, delayed reimbursement of Out-of-Pocket expenses, and missed funder deadlines.

LCSNW will respond as follows to expenses that do not meet requirements of this policy:

- 1. Expenses inadvertently charged to the Agency card and claimed as personal must be repaid.
 - a. Employees must check the "personal" box in Concur.
 - b. If the expense report also has Out of Pocket, the Out of Pocket reimbursement will be reduced by the amount of any personal charges.
 - c. If there is no Out of Pocket (or not enough to cover the personal charges) the amount due LCSNW will be deducted from payroll wages.
- 2. If expenses lack a business need or a complete itemized receipt disciplinary action starting with write-ups up to termination of employment may occur.
 - a. Out-of-Pocket expenses will not be reimbursed
 - b. Credit card will be canceled and the employee will be asked to repay the charges
- 3. The accounting department has the authority to suspend any card at any time if it suspects suspicious or fraudulent activity OR if the cardholder is not in compliance with this policy.
- 4. The issuing bank can suspend a card with notice requiring a cardholder to respond within 24 hours if it determines that fraudulent or suspicious activity has occurred
 - Employees are required to maintain current contact information with the issuing bank and resolve disputes with the bank directly. Failure to do so can result in employees held personally responsible for fraudulent transactions.

Agency Card Remedies for Improper Usage

LCSNW is responsible to its bank for all purchases and payments related to agency cards. Proper use, security of the card, and timely filing of approved expense reports are therefore conditions for having a card.

- LCSNW reserves the right, at any time, to temporarily deactivate or permanently revoke any agency card
- 2. At LCSNW's discretion, LCSNW has the right deduct from an employee's pay charges that are not reported or properly documented, or not substantiated as legitimate business expenses
- 3. LCSNW also has the right to deduct from employee's pay or deduct from employee's pay for any charges that the employee acknowledges were personal in nature
- 4. LCSNW recognizes that cards can be compromised through no fault of an employee and will protect its interests by having any compromised card canceled and reissued

5.	The Controller or CFO may decide at any time to temporarily deactivate or permanently close an agency card due to improper use, untimely filing of expense reports, use of the card by someone other than the cardholder, and/or unsubstantiated or unsupported expenditures