Expense Report Best Practices

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October 2018





Agenda

- Goals
- Documentation Requirements
- Business Purpose Explanations
- Approver Guidance
- Delegation of Approval Authority



Lean Travel Policy Timeline





Three Key Takeaways



Better Documentation Better Business Purposes

Approver Responsibilities & Delegation



Travel Policy Goals

#1 Ensure compliance with IRS Accountable Plan Rules

IRS Publication 463, Chapter 6: How to Report > Accountable Plans

Expenses incurred by employees must meet accountable plan requirements for reimbursement to be excluded from the individual's taxable income:

- 1) Adequately account for expenses that have a business connection
 - Meeting documentation requirements and business purpose explanations satisfy this requirement
- 2) Adequately account for expenses within a reasonable period of time
 - 60 days from the date of event, return from trip, or date of expenditure if no event or trip involved
- 3) Individual must return excess reimbursement or advance within a reasonable period of time



Documentation Requirements

Current State

- Sufficient documentary evidence must be provided to substantiate the expense and support the business purpose
- Original documentation is required until an electronic/ automated system implemented
- However, a scan/copy is better than no receipt

Future State

- Electronic or scanned documentation acceptable, provided the image is clear and complete, except where prohibited by sponsor requirement
- Departments should implement procedures to ensure the same expense is not submitted multiple times

Documentation Retention

- Documentation submitted to Accounts Payable is retained for 7 years in accordance with University policy
- Departments should establish their own procedures for handling, retaining and purging of original receipts/documentation according to the <u>Policy on Retention of University Records</u> and sponsor guidelines



Documentation Requirements

- Those being reimbursed should neither gain nor lose financially
 - Consider Pcard for non-travel business expenses
- All expenses submitted must be based on actual cost
- Exceptions (missing, less than complete documentation) should be rare, not the norm
- Credit card statements/receipts alone do not provide adequate detail
- Receipt should show proof of payment, balance due = \$0



Documentation Details

- Documentation must include
 - name of the vendor,
 - location,
 - date,
 - dollar amount of the expense, and
 - description of the goods or services received
- If this info is not on a receipt and form of payment was credit card, then a copy of credit card statement is required
- Incomplete or poor-quality documentation may require additional substantiation



Documentation – Best Practices

- Include information needed to clarify or to establish the accuracy or reliability of information contained in your records
- Submit "proof of attendance" for documenting that a traveler attended the conference or seminar for which they were traveling
 - Best practice: include copy of a Certificate of Completion or a copy of the certificate awarding Continuing Professional Education
 - Include the conference brochures or other agendas distributed at the event



Documentation Details - Meals

- Meals: Itemized receipt and the transaction (credit card receipt) should be submitted
- Alcohol should be separated out for grants and non-grants (impacts overhead rate)



Documentation Details - Meals

- Involving people other than the person being reimbursed
 - Listing of attendees
 - A descriptor with regard to affiliation: department staff, donor, prospective employee, students, etc.
 - If impractical to obtain a listing of individual names, include an estimated count for attendance and affiliation(s)
 - Best practice: include invitation for the event/meeting

Acceptable Meal Receipt









- Who: If anyone other than yourself was involved with the expense then specify who
- When: If not the transaction date on the receipt, indicate when the expense occurred
- Where: Where did the expense occur
- What does the expense represent
- Why or How does they expense relate to University business



- Documentary evidence to substantiate an expense always involves a business justification
- Goes beyond the documentation of what might be on a receipt: What, When, Where
 - Simply restating what the expenses are does not constitute a properly completed business purpose section
- Should explain Why the expense was incurred and How it has a business connection
- Should attempt to explain the business benefit gained or expected from incurring the expense



- Should be provided for individual expenses items rather than a high-level statement of connection to business for multiple expense transactions
- Acronyms should be spelled out so that an auditor would understand



Poor Related Multi-Expense Purpose

Fall semester expenses

A Campbell admissions expenses

Good Related Multi-Expense Purpose

Expenses related to supplies and refreshments served for students at Wilson Days events

Meals to discuss Workday Student implementation, mileage for meeting prospective students in Buffalo, supplies for Eastview mall College Night



Poor Specific Purpose

Lunch meeting

Expenses for new student welcome event

Good Specific Purpose

PI Joe Smith held lunch meeting at Distillery on 10/1 to discuss ABC research project with PhD students Kathy Walker and Bob Jones

Expenses from the new student welcome event to discuss financial aid and registration, sponsored by Student Leadership Council on 10/12. ~100 undergraduate students, Financial Aid and Admissions staff attended.



Poor Specific Purpose

Mike Smith travel to California

Meetings in LA to discuss research

Good Specific Purpose

Mike Smith traveled to San Francisco, CA 10/15-10/20 to attend NACUBO conference to network with peers at other universities and learn best practices

Travel expenses for trip to Louisiana State Univ in New Orleans 9/15-20 to meet with Ed Hogan to discuss mouse hair color research



- Are valid business purposes provided for the various expenses submitted?
 - Do business purpose explanation answer Who, When, Where, What, Why/How?
- Do the expenses comply with policies:
 - University (<u>Finance Policies</u>)
 - Sponsored Research requirements
 - Federal regulations
 - Departmental guidelines



- Are sufficient receipts attached?
 - Do dates of expenses and receipts align?
 - Are expense amounts and receipts aligned?
- Is there adequate itemization of receipts to account for different types of expenses?
- Is the cost allocation (distribution of charges) appropriate/correct?



- How old are the expenses?
 - IRS generally considers an expense submitted within 60 days as reasonably timely
 - Older expenses should receive more scrutiny.
 - Best practice: Provide an explanation as to why the expenses were not submitted sooner



- It is the responsibility of approvers to
 - Request additional support and/or explanations as needed
 - Push back on non-compliant expense claims
 - Remove expenses that are not sufficiently supported
 - Counsel employees as needed to avoid future confusion, questions and/or delays
- University Integrity Hotline: 756-8888



Delegation of Approval Authority

When a manager delegates approval authority, the manager still retains responsibility for ensuring that only appropriate expenses are approved

A manager who delegates approval authority must establish:

- A process that allows the designated approver direct access to manager for any inappropriate items.
- A periodic monitoring process to ensure that the transactions approved by the delegate are appropriate business.
- Delegation should be documented in writing



Data Analytics

University Audit has implemented a Data Analytics program to identify:

- Duplicate submission of travel expenses.
- Same expenses submitted via Request for Payment and Travel & Conference expense reports.
- Pcard receipts re-submitted on a Travel & Conference expense report.



Expense Report Case

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Expense Report Case II





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Three Key Takeaways



Better Documentation Better Business Purposes

Approver Responsibilities & Delegation





