**PROCEDURE**

*This Procedure does not provide for each and every instance that a colleague may encounter while traveling or conducting business; therefore each colleague is expected to exercise sound judgment.*

This Procedure sets forth permitted expenses for Trinity Health authorized travel and other Trinity Health business activities and defines the roles and responsibilities of each colleague and each reviewing manager to ensure compliance with this Procedure. The Corporate Travel Office shall be responsible to develop a version of this Procedure (with changes only related to titling, formatting, labeling, etc.) to use with contracted vendors when Trinity Health and its Ministries and Subsidiaries have contractually committed to reimburse such contracted vendor’s travel and business expenses. This Procedure is intended to comply with IRS rules and will be updated when necessary.

**SCOPE/APPLICABILITY**

This Procedure is intended to apply to Trinity Health and its Ministries and Subsidiaries and contracted vendors to the extent Trinity Health is required to reimburse such vendor for travel and other business expenses and such vendor contract incorporates the requirements of this Procedure into its terms and conditions.

Ministries and subsidiaries may adopt local standards that may be more restrictive than the requirements of this Procedure.

**DEFINITIONS**

*Corporate Travel Office* means the Trinity Health Corporate Travel Office within the Office of the President.
Travel Management Company (“TMC”) means Conlin Travel or such other outside travel agency as may be designated from time-to-time.

Executive Leadership Team (“ELT”) means the group that is composed of the highest level of management at Trinity Health.

Philanthropy Events means a gathering of prospective donors, organized by a member of philanthropy staff, where the purpose of the meeting is to directly advance the participants’ interest in giving to the organization. Examples include cultivating donor appreciation, and campaign celebration events.

Policy means a statement of high-level direction on matters of strategic importance to Trinity Health or a statement that further interprets Trinity Health’s governing documents. System Policies may be either stand-alone or Mirror Policies designated by the approving body.

Procedure means a document designed to implement a Policy or a description of specific required actions or processes.

Ministry means a first tier (direct) subsidiary, affiliate or operating division of Trinity Health that maintains a governing body that has day-to-day management oversight of a designated portion of Trinity Health System operations. Ministries may be based on a geographic market or dedication to a service line or business.

Standards or Guidelines mean additional instructions and guidance that assist in implementing Procedures, including those developed by accreditation or professional organizations.

Subsidiary means a legal entity in which a Trinity Health Ministry is the sole corporate member or sole shareholder.

RESPONSIBLE DEPARTMENT

Further guidance concerning this Procedure may be obtained from the Corporate Travel Office.

RELATED PROCEDURES AND OTHER MATERIALS

- Trinity Health Finance Procedure No. ________ - Corporate Card Program
- Appendix A - Travel Agency, Travel Manager, and Payroll Manager, Internal Audit and Supply Chain Management contact information
- Appendix B - “Daily Meal Maximums”
- Appendix C - List of “Non-Reimbursable Expenses”
- Appendix D - Frequently Asked Questions (FAQs)

APPROVALS

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Trinity Health

Travel and Other Business Expenses Procedure

Effective date August 29, 2019
# TABLE OF CONTENTS

**PROCEDURE** .................................................................................................................. 1-15

**APPENDIX A – CONTACTS** ........................................................................................................... 16

**APPENDIX B – DAILY MEAL MAXIMUMS** ................................................................................. 17

**APPENDIX C – NON REIMBURSEABLE EXPENSES** ................................................................... 18

**APPENDIX D – FREQUENTLY ASKED QUESTIONS (FAQ)** ....................................................... 19-24

**ROLES AND RESPONSIBILITIES** ................................................................................................. 1
- Colleague ......................................................................................................................................... 1
- Management ...................................................................................................................................... 1
- Finance/Payroll ................................................................................................................................. 1
- Internal Audit .................................................................................................................................... 1
- Supply Chain Management ............................................................................................................... 1

**ADMINISTRATIVE** ............................................................................................................................ 2
- Form Of Payment: Personal/Corporate Travel/Purchasing Cards .................................................. 2
  - See also: Separate procedure for Trinity Health Corporate Card Program
- Documentation Requirements ............................................................................................................. 2
- All Other Forms Of Payment ............................................................................................................. 2
- Receipts (Itemized) .............................................................................................................................. 2-3
  - See also: “Incidental Expenses” .................................................................................................... 11
  - See also: “Meals” ............................................................................................................................. 12
  - See also: “Alcohol” ............................................................................................................................ 13
- E-Receipts .......................................................................................................................................... 3
- Approval And Submission Deadlines .................................................................................................. 3
- Method Of Reimbursement ............................................................................................................... 3
- Non-Reimbursable Items .................................................................................................................... 3
  - See also: “Appendix C – Non-Reimbursable Expenses” ................................................................. 18

**TRAVEL** ........................................................................................................................................ 3
- Trinity Health Corporate Travel Program .......................................................................................... 3-4
- Exceptions To Using The Corporate Travel Program ......................................................................... 4
  - See also: “Appendix D – Frequently Asked Questions” .................................................................. 19-24
- Travel Authorization .......................................................................................................................... 4
- Mode Of Transportation (Air Travel vs. Personal Car vs. Auto/Car Rental) ........................................ 4
- Combining Personal And Business Travel ......................................................................................... 4-5
  - See also: “Appendix D – Frequently Asked Questions” .................................................................. 19-24
- Extended Out Of Town Assignments .................................................................................................. 5
- Colleagues Traveling Together ........................................................................................................... 5
- Personal/Spouse/Family Travel Arrangements .................................................................................... 5
- Travel Advances ................................................................................................................................. 5-6
- Insurance ............................................................................................................................................ 6
- Car Rental Accident/Damage ............................................................................................................. 6
  - See also: “Appendix D – Frequently Asked Questions” .................................................................. 19-24
- Gratuities ............................................................................................................................................ 6
- Telephone ............................................................................................................................................ 6
  - See also: Separate policy for cell phone
Internet  ........................................................................6-7
See also: “Appendix D – Frequently Asked Questions”  .............19-24
Frequent Traveler Benefits  ..............................................7

AIR TRAVEL ......................................................................7
See also: “Mode Of Transportation” .....................................4
E-Ticketing  .......................................................................7
Class Of Airline Service  .....................................................7
See also: “Frequent Traveler Benefits”  .................................7
Alternative Airports ...........................................................7
Canceled Flights ..................................................................8
See also: “Emergencies” ......................................................8
Missed Flights .....................................................................8
Emergencies .......................................................................8
Denied Boarding ...............................................................8
Baggage Fees .....................................................................8
Laptop Computers ................................................................9
Lost Luggage .....................................................................9
See also: “Appendix C – Non-Reimbursable Expenses” ............18

HOTELS ..............................................................................9
See also: “Frequent Traveler Benefits”  .................................7
Business Mileage Distance Requirement For Overnight Stays ....9
Room Service ......................................................................9
See also: “Appendix B – Daily Meal Maximums” .....................17
In Room Mini-Bar/ Snack Service/Vending Machines ...............9
No Show/Missed Reservations ...........................................10

GROUND TRANSPORTATION ........................................10
Auto/Car Rental ..................................................................10
See also: “Mode Of Transportation” .....................................4
See also: “Insurance” .........................................................6
Car Class ..........................................................................10
Refueling Rental Cars .........................................................10
Additional Rental Car Drivers ..............................................10
Taxi/Shuttle Fares ............................................................11
Limousines And Transportation Services ................................11
Airport Parking ....................................................................11
See also: “Combining Personal And Business Travel” .............4-5
Incidental Expenses ............................................................11
Use Of Personal Automobiles ..............................................11
See also: “Mode Of Transportation” .....................................4-5
See also: “Mileage Reimbursement” ....................................11-12
Mileage Reimbursement .......................................................11-12
See also: “Appendix D – Frequently Asked questions” for examples 19-24
Rail/Bus ..............................................................................12
MEALS

Daily Meal Maximums  

Same Day Business Travel  

Meals Including Colleagues And/Or Non-Colleagues  

See also: “Appendix D – Frequently Asked Questions” for examples  

See also: “Meetings/Seminars/Conferences”  

Alcohol  

CONSULTANTS  

ENTERTAINMENT

Employee Recognition  

Celebrations  

See also: “Gift Cards”  

OTHER

Meetings/Seminars/Conferences  

See also: “Meals”  

See also: Separate Policy For Supplier Code of Conduct  

Cellular Phone  

See also: Separate Policy For Cell Phone  

Flowers  

See also: “Appendix D – Frequently Asked Questions”  

Gift Cards  

See also: “Room Service” for exclusions
ROLES AND RESPONSIBILITIES

All colleagues have stewardship responsibility for managing business-related expenses, and for reading, understanding, and complying with this Procedure, as well as any other locally defined standards.

Colleague

It is the colleague’s responsibility to obtain his/her manager’s approval prior to incurring travel and other business expenses for which reimbursement will be expected. Management reserves the right to deny reimbursement of items not deemed in compliance with this Procedure or other restrictions in a Ministry’s locally defined standards.

Failure to comply may result in delayed or denied payment, travel restrictions, and/or disciplinary action.

Management

The colleague’s direct manager is responsible for ensuring the expense reimbursement request contains all original or e-receipts, is clerically accurate, categorized properly, and has a clearly documented business purpose. Expense reports should be approved quickly to allow for processing, or returned for a clear explanation of what is needed. It is the manager’s responsibility to counsel colleagues on Procedure application, ensure travel pre-authorization, and steward resources (i.e., cab sharing, cost-benefit analyses of various travel options, etc.).

Finance/Payroll

The Finance/Payroll Department is responsible for processing approved and supported expense reimbursement requests.

If documentation is insufficient to satisfy IRS requirements, or other deficiencies are noted, the expense report and supporting documentation will be promptly returned to the colleague’s immediate manager with a specific request for additional information.

Internal Audit

Internal Audit performs periodic expense report reviews to determine compliance with this Procedure.

Supply Chain Management

System Office Supply Chain Management negotiates master contracts with travel vendors for the benefit of all of Trinity Health. Suggestions regarding travel services should be submitted to Supply Chain Management or to the Corporate Travel Office.
ADMINISTRATIVE

Form of Payment: Personal/Corporate Travel/Purchasing Cards

- Infrequent travelers are expected to use cash or a personal credit card for travel-related expenses. Expense reports are processed with each normal payroll cycle and therefore should be submitted as soon as travel is completed to allow for prompt reimbursement.
- If a colleague has a consistent business travel need, a corporate card may be issued for all travel-related expenses.
- If a department has travel and other non-travel related business expenses, a corporate card may be issued to an accountable colleague within the department for coordinated purchasing.

(See also: Separate procedure for Trinity Health corporate card program)

Documentation Requirements

Documentation requirements are based on IRS rules: travel, meals and entertainment must be ordinary and necessary, substantiation of business purpose is required, and must be clearly documented.

To substantiate business purpose, colleagues must answer the five “W”s - who, what, when, where and why. This includes the amount, place, dates of travel or event, names and business relationship of those involved, and the nature of business discussed.

All Other Forms of Payment

To aid the manager’s review, to facilitate scanning, and for storage retention purposes, receipts should be affixed securely (not stapled) to an 8.5” x 11” sheet of paper, and submitted in the order listed on the expense reimbursement request. Receipts must be listed individually on the expense report form; grouping is not acceptable. Expense report submissions must be clerically accurate.

Receipts (Itemized)

Acceptable documentation:

- Air travel – Corporate Travel vendor itinerary; email or .pdf copy.
- Lodging – Corporate Travel vendor itinerary, original detailed receipt (e-receipt is acceptable), and documentation of payment. In the case of express checkout, when no credit card charge slip is issued, the lodging bill should indicate the name and the last 4 (four) digits of the credit card charged.
- Auto rental – Corporate Travel vendor itinerary and original car rental receipt issued by the car rental company at conclusion of the trip. E-Receipts are also acceptable.
- Meals – An itemized original receipt detailing all items purchased and proof of payment are required. Alcohol needs to be identified separately since it is not an allowable expense for Medicare and Medicaid cost report purposes, and therefore is not reimbursable.
If an original, detailed receipt or e-receipt is missing or not available, reimbursement of up to $25 may be made if the colleague provides a signed statement with an acceptable explanation of why a detailed receipt is not available.

(See also: “Alcohol”)

E-receipts

E-Receipts are an IRS accepted electronic version of a colleague’s vendor receipt.

Approval and Submission Deadlines

Expense report forms should be completed and signed by the colleague, and approved and signed by his/her immediate manager. In the event the immediate manager is not available, a delegated manager at least as senior as the immediate manager may approve the expense report. Support staff may not sign on behalf of their managers, under any circumstances.

By their approval, managers acknowledge they can answer all questions regarding the expense submission, ensure all required documentation is included, and ensure the submission complies with this Procedure.

Expense reports for out-of-pocket expenses should be submitted within (30) days of incurring the expense and will not be reimbursed if submitted more than (120) days after the expense is incurred.

Reconciliation and approval of corporate issued travel and purchasing card charges must be submitted (3) days prior to the payment due date, generally (30) day cycles.

Method of Reimbursement

Reimbursement of complete and approved requests will follow the payroll payment method elected by the colleague.

Non-Reimbursable Items

A complete list of non-reimbursable items can be found in Appendix C.

TRAVEL

The IRS defines travel expenses as those that are ordinary and necessary when traveling away from home for business. Travel expenses eligible for reimbursement must comply with this Procedure and with the IRS definition.

Trinity Health Corporate Travel Program

In order to maximize efficiency in the arrangement and purchase of business travel services, colleagues are required to use the designated Travel Management Company (“TMC”) to make all arrangements through one of the following:
• The online booking tool (most cost efficient)
• Call a reservations agent (fees slightly higher)

Travelers are expected to establish and maintain their traveler profile. Non-colleagues should not have a profile, and the online booking tool should not be used for personal travel arrangements; please call an agent directly. (See also: combining personal and business travel)

Group meetings/conferences/seminars/etc., which require a hotel room block, must be coordinated with the Corporate Travel Office.

Exceptions To Using The Corporate Travel Program

The following situations are the only exceptions:

• Non-Trinity Health sponsored events; and
• Continuing Medical Education (“CME”) physician travel

(See also: “Appendix D – Frequently asked questions” for description of each exception.)

Travel Authorization

For colleagues at the Director level and below, travel requires advance approval by an immediate manager. An Executive Vice President must approve international, unusual destinations, or travel exceeding the requirements of this Procedure. Additional approvals or restrictions may be implemented at the discretion of the Executive Leadership Team.

Mode of Transportation (Air Travel vs. Personal Car vs. Auto/Car Rental)

• Air Travel – appropriate for business destinations four hours or more driving time away from the colleague’s base office.
• Personal Car – appropriate when mileage reimbursement is less than the combined cost of air or other commercial transportation or the cost of a rental car. Documentation supporting the lower cost must be provided with the expense reimbursement submission. (See “Mileage Reimbursement”)
• Auto/Car Rental – appropriate if the total cost of the rental including gas is less than mileage reimbursement cost for use of a personal vehicle. If a rental is more expensive than alternative means (e.g., mileage, cab, hotel shuttle, etc.) reimbursement may be limited to the least expensive option.

Combining Personal and Business Travel

A colleague may combine approved business travel and personal travel on the same trip provided the following provisions are met:

• The colleague’s immediate manager is fully informed of the travel plans and has given approval before the travel occurs;
• The colleague assumes full responsibility for all additional expenses not directly related to the approved business portion of the trip;
• The time spent by the colleague on the personal portion of the trip is properly recorded as paid time off, holiday, or time off without pay, as appropriate; and all other applicable provisions of this Procedure are properly observed; and
• The personal costs are clearly documented and excluded from the business travel reimbursement request.

(See also: “Appendix D – Frequently asked questions”)

Extended Out of Town Assignments

Colleagues on out-of-town assignments extending over a weekend (Saturday and Sunday) are permitted to return home for the weekend. The cost of air travel to fly home and thereafter return to the site of the out-of-town assignment is a reimbursable expense.

If in lieu of returning home, the colleague remains over the weekend at the business location, the costs associated with the weekend stay (i.e., meals, hotel, and ground transportation) are reimbursable if:

• The colleague has prior management approval;
• The cost to stay on-site is less than the cost to return home;
• For non-exempt colleagues, labor costs have been considered in the cost/benefit analysis; and
• The overall cost analysis is attached to the expense report submission.

Colleagues Traveling Together

To recognize the need for continuity of overall operations, no more than 10 colleagues can travel on the same aircraft and no more than 50% of a class can travel on the same aircraft (i.e., Board of Directors, Executive Leadership Team, ministry executive team, etc.). Additionally, the CEO, CFO, and COO of System Office and/or an individual ministry cannot travel on the same aircraft.

Personal/Spouse/Family Travel Arrangements

Colleagues may access Trinity Health discounts for personal travel by contacting the Corporate Travel Agency. Colleagues are responsible for all agent assist fees. All incremental costs for personal, spousal, and family travel are the responsibility of the colleague and are not eligible for reimbursement.

Travel Advances

Travel advances are limited to extenuating circumstances and will not be processed for a colleague that has an outstanding travel advance. Requested amounts must be reasonable and allow for adequate processing time.
Colleagues must provide an accounting of the use of funds on an expense report within ten (10) business days of completion of the trip, and must include cash or a personal check for any unused portion of the advance.

Trinity Health may initiate payroll deductions to recover unpaid and undocumented travel advances after obtaining colleague approval. IRS regulations require any undocumented and unrecovered advance of funds be included in taxable earnings.

**Insurance**

Travel/accident insurance is provided to all active colleagues traveling on company business. Active colleagues are generally those defined as working 20 or more hours per week. Should an accident occur, please notify your facility’s risk manager or insurance coordinator immediately. Additional insurance desired by the colleague is a personal expense and is not reimbursable.

**Car Rental Accident/Damage**

Following an auto accident, either sustaining physical damage to a rental vehicle or while operating a personal vehicle within the course and scope of his/her employment, the traveler should follow specific steps to report the incident.

*(See also: “Appendix D – Frequently asked questions”)*

**Gratuities**

Tips must be itemized on the expense report and will be reimbursed up to the amounts listed below regardless of actual gratuity dollar amount given.

- **Baggage service**: limit $1.00 per bag
- **Housekeeping service**: limit $2.00 per day
- **Hotel shuttle**: limit $1 per person for trips under 15 miles one-way, $2 per person for trips over 15 miles one-way
- **Taxi and all other ride-share or ground transportation**: limit 10% - 20% per ride
- **Wait staff**: limit 15%-20% per meal

**Telephone**

All calls made during travel should generally be made from a colleague’s cellular phone. Due to the high cost, telephone services should not be charged to a hotel bill. In emergency situations, long distance telephone calls should be charged to a credit card.

*(See also: Separate policy for cell phone)*

**Internet**

When internet connection is required during business travel and free internet connection is not available, charges up to a maximum of $10/day will be reimbursed. Colleagues are expected to use hotel common area free internet if free in-room access is not available.
In any situation that falls outside of this Procedure, there needs to be a reasonable business need for connectivity, and the reason must be clearly documented.

*(See also: “Appendix D – Frequently asked questions” for appropriate circumstances)*

**Frequent Traveler Benefits**

Benefits from airline, hotel, or automobile frequent traveler programs, including Trip-It fees, are the property of the traveler. Selecting an airline, hotel, or automobile rental firm, or other travel related supplier, should not be based simply on the colleague’s participation in frequent traveler programs. Fees charged to participate in such frequent traveler programs are to be paid by the colleague and are not a reimbursable expense.

**AIR TRAVEL**

Reservations should be made 21 days in advance or 14 days, of the travel date when possible at all times to secure lowest logical airfare. Certain airfares requiring advance purchase provide considerable cost savings, but many include cancellation penalties. Travelers will be advised of the cancellation penalties and will need to assess the penalty risk given the firmness of the travel itinerary. The use of these fares is strongly encouraged, particularly for trainings and conferences when travel dates are known and are not generally subject to change.

*(See also: “Mode of transportation”)*

**E-Ticketing**

E-Ticketing is now the standard form of ticketing. Travelers must ensure they have their email confirmation/invoice available for check-in, either online or at the airport, 24 hours prior to travel in order to receive a boarding pass document required for airport security.

**Class of Airline Service**

Colleagues are expected to travel on the lowest logical coach or economy class airfare for Trinity Health business. Colleagues traveling by air are expected to plan their trips utilizing these fares and book in advance. Ticket upgrades may be done at the colleague’s expense or using a colleague’s frequent flyer program. First Class, Business Class, Economy Comfort, or similar upgrades are not eligible for reimbursement. Southwest Early Bird check-in is allowed and reimbursable.

Under no circumstances are charter or private aircraft services permissible.

*(See also: “Frequent traveler benefits”)*

**Alternative Airports**

In some cities, arriving or departing from alternative airports can yield significant savings for the company. Colleagues may search airport options with varying distances to/from the destination within the online booking tool. For non-exempt colleagues, additional labor costs must be considered in the cost/benefit analysis of flying from alternative airports.
Canceled Flights

Most flights can be changed/canceled online through TMC. Circumstances when a colleague will need to contact TMC are multiple airlines on one ticket, trip originally booked by an agent, or canceling too close to travel date.

If flights are canceled for business reasons (e.g., project ends early or is extended, business emergency requires the colleague to be in a different location, etc.), cancellation fees are reimbursable with manager approval.

If flights are canceled for personal reasons, colleagues are responsible for payment of all fees associated with the cancellation.

Any credits for unused airline tickets remain the property of Trinity Health for future business travel.

(See also: “Emergencies”)

Missed Flights

If a colleague misses a flight due to a legitimate business reason, Trinity Health will cover the cost of the new flight. Except in the case of emergencies as set forth in this Procedure, flights missed for personal reasons are the colleague’s responsibility and Trinity Health will not reimburse the cost of the new flight.

Emergencies

In the event of a personal emergency, (e.g., death or illness in the immediate family) travelers should contact the TMC immediately. All expenses incurred to alter travel plans are reimbursable. Many airlines will waive penalties for emergency situations, so please be certain to advise them of the nature of the emergency.

Note: travelers may be required to provide the airline written proof of the emergency in the form of a doctor’s note, death certificate, or other documentation.

Denied Boarding

Frequently, airlines will over book flights or change equipment, resulting with too few seats for all passengers holding confirmed reservations. Airlines will request volunteers to give up their seat in exchange for compensation of the airline’s choosing. Trinity Health colleagues should not volunteer for denied boarding, unless doing so does not impact the colleague’s work schedule.

Baggage Fees

Often, one or two day business travel does not require the use of checked baggage. Reasonable airline baggage fees for extended overnight trips and excess baggage charges are reimbursable. Meeting materials not able to be carried on should be shipped to your destination in advance.
**Laptop Computers**

Laptop computers must be carried on and never checked or given to the valet for planeside loading.

**Lost Luggage**

Colleagues should avoid traveling with valuables. If necessary, these items should be carried on board the aircraft with the colleague. The colleague is responsible for claims for lost luggage, and must report them immediately to the airline.

*(See also: “Appendix C - Non-reimbursable expenses”)*

**HOTELS**

Trinity Health is committed to providing its travelers with comfortable and safe accommodations. Trinity Health colleagues are expected to:

- Utilize facilities for which Trinity Health has established a preferred rate program;
- Stay in hotels offering safe, clean and comfortable rooms at a competitive price; and
- Stay in a standard rate, single occupancy room.

Preferred hotels and rates are marked “In Policy” within the online booking tool, and are available on the Trinity Health intranet website. Room upgrades are not a reimbursable expense.

*(See also: “Frequent traveler benefits”)*

**Business Mileage Distance Requirement for Overnight Stays**

Lodging for overnight stay is not reimbursable unless the trip is over 50 miles from your primary work location or home – whichever is less. Exceptions to overnight stay must have a legitimate business purpose and must be approved by the colleague’s manager in advance and documented in the Trip Description field of your vendor issued itinerary.

**Room Service**

Room service may be utilized by colleagues, but must be recorded on the expense report as a meal expense. Colleagues who elect to utilize these services are expected to exercise reasonable judgment and remain consistent with meal guidelines and daily maximums.

*(See also: “Appendix B - Daily meal maximums”)*

**In-Room Mini-Bar/Snack Service/Vending Machines**

In room mini-bar, in-room snack items, vending machines purchases, etc. are not reimbursable.
No Show/Missed Reservations

Guaranteed room reservations must be cancelled if travel plans change for any reason and the room will not be needed. Any fees or charges incurred for failure to cancel are the responsibility of the colleague.

GROUND TRANSPORTATION

Ground transportation refers to all transportation to and from home and airport, and to and from airport, hotel, and meeting location. If reasonable, colleagues are strongly encouraged to car-pool. Otherwise, colleagues should use the least expensive alternative (e.g., personal vehicle, airport bus or shuttle, cab, etc.).

Auto/Car Rental

Preferred vendors and negotiated rates are available through the TMC as well as Trinity Health’s intranet website. Rental cars may be used as transportation from either the colleague’s workplace or an airport to the seminar or meeting destination. Colleagues are expected to use less expensive alternatives where available. Rental car expenses for local travel by colleagues to and from work are not reimbursable.

Collision Damage Waiver (“CDW”) or Loss Damage Waiver (“LDW”) insurance and Personal Accident Insurance (“PAI”) offered by the car rental agencies should always be declined. The only exception would be for rentals in foreign countries where colleagues are required to accept loss damage waivers of insurance coverage.

(See also: “Mode of transportation” and “Insurance”)

Car Class

Preferred vendors, rates, and car classes are marked “In Policy” within the online booking tool. A colleague may upgrade to a higher automobile class at their own expense, unless there is a legitimate business purpose approved by their manager (e.g., four or more colleagues sharing one vehicle, etc.).

Refueling Rental Cars

Pre-purchase of fuel should be declined. Colleagues are expected to refill the gas tank before returning a car to avoid surcharges and higher gas prices.

Additional Rental Car Drivers

All additional rental car drivers must have all of the following criteria met:

- Active colleague employed by Trinity Health;
- Valid driver’s license; and
- Added as an additional driver in the reservation with the car rental company.


**Taxi/Shuttle/Rideshare Fares**

Fares and a reasonable gratuity for taxi, shuttle and all other third party rideshare companies to and from hotels or office locations while on business trips are reimbursable. Fares and gratuity for these services unrelated to business are a personal expense and are not reimbursable.

**Limousines and Transportation Services**

Expenses for limousines and transportation services to/from airports will only be reimbursed if the colleague demonstrates with appropriate detail and calculations that this type of transportation service is less expensive than:

- Mileage less normal commute, plus long-term airport parking fees;
- Taxi/rideshare; and
- Airport shuttle service.

**Airport Parking**

Long-term parking is preferred and parking fees are reimbursable for company business. Colleagues who elect to use short-term parking or valet will be reimbursed up to the long-term parking rate. Colleagues are asked to use discount-parking coupons if available for their local airport.

If combining personal with business travel, parking related to personal travel must be clearly documented and is not reimbursable.

*(See also: “Combining personal and business travel”)*

**Incidental Expenses**

Tolls and parking fees are reimbursable.

**Use of Personal Automobiles**

Colleagues using personal automobiles on company business are required to carry the liability and auto/no-fault insurance limits required by the state in which the car is registered. Gasoline, auto repair, and towing are not reimbursable.

*(See also: “Mode of transportation” and “Mileage reimbursement”)*

**Mileage Reimbursement**

Business miles are defined as miles driven to and from client sites, airport, and/or other business destinations required in the performance of colleague’s business responsibilities excluding normal round trip commute miles between home and his/her primary office location. Commuting mileage must be deducted regardless of whether the colleague went to his/her primary office and will not be reimbursed.
Mileage reimbursement is calculated at the published IRS rate per mile, or lesser amount if locally defined. To calculate reimbursable miles, track and record total miles for the trip. Then, subtract normal daily total commuting miles multiplied by the days you are away.

(See also: “Appendix D – Frequently asked questions” for examples and commute miles for remote colleagues)

**Rail/Bus**

Reservations for rail or bus transportation must be made through the online booking tool or by calling the TMC directly.

**MEALS**

The IRS has established firm guidelines around dining with and/or hosting others. These meals and expenses must be directly related to the active conduct of business. Discussions must occur with the general expectation of deriving specific business benefit, and must be during, immediately preceding, or following the business meal and/or event. If the scope of the meal is outside of the acceptable business purposes, the reimbursement request will be denied.

Documentation must support this IRS requirement, including:

- Date and place of event;
- Nature of the business discussion;
- Name, title and business relationship of all attendees; and
- Itemized cost detail.

**Daily Meal Maximums**

For business travel, Trinity Health has established daily meal maximums based on IRS published daily guidelines. A grid of daily maximums by geographical location (including high-cost locations) is provided as Appendix B to this Procedure, and will be updated periodically. Colleagues are expected to use these daily maximums for three meals (breakfast, lunch and dinner) as a not-to-exceed guideline.

Snacks and beverages purchased during travel and business assignment days with a receipt are considered part of meals and are subject to the total daily maximum calculation.

(See also: “Room service” for exclusions)

**Same Day Business Travel**

Meal expenses for same day local travel are not reimbursable. Colleagues who travel by air, rail, or car for same day business trips (10 hours or more) are entitled to reasonable meal reimbursement while actively traveling and/or working on business assignment (generally one meal). Business travel ends when the traveler returns to their personal vehicle after the flight lands.
**Meals Including Colleagues and/or Non-Colleagues**

When colleagues are traveling on Trinity Health business, each traveler should request separate checks or the most senior colleague participating in a group meal should pay. Meals for non-business related persons and meals between colleagues in route to local meetings are not eligible for reimbursement. Colleagues should plan to pay personally. Other occasions when dining with colleagues or non-colleagues, the most senior colleague participating in a group meal should pay for and report the expense.

The expense report submission must contain a detailed receipt and list all participant names and the business purpose for the meal. If the scope of the meal is outside of acceptable business purposes, the reimbursement request will be denied. Colleagues should not submit reimbursement for additional food purchases when attending an off-site meeting/seminar/conference/etc. when meals are included as part of the event cost.

(See also: “Appendix D – Frequently asked questions” for examples and “Meetings/seminars/conferences”)

**Alcohol**

Alcohol is not a permitted expense on Medicaid or Medicare cost reports and for this reason, is highly discouraged. Alcohol may be reimbursed for legitimate business reasons, such as governance and physician recruitment activities at the system office and ministry level if approved in advance by a department Vice President or ELT member. Alcohol should be listed separately on the expense report and excluded from Medicaid and Medicare cost reports.

For meetings, summits and regional conferences, please arrange for a cash bar in advance. Alcohol should not be included as part of the event in meal packages or group rates and should be paid for separately.

When traveling, alcohol must be placed on a separate bill, paid for by cash or personal credit card, and will not be reimbursed. This applies to all meals including recruiting and travel for continuing medical education (CME), conferences and other professional development events.

If a ministry holds Philanthropy events, the ministry should review and comply with the Philanthropy Events Alcohol Procedure.

(See also: separate policy “Philanthropy Events Alcohol Procedure”)

**CONSULTANTS**

The extent this Procedure applies to consultants is determined at the point of engagement as defined in the contract or written agreement. Consultants subject to this Procedure will be provided a copy, which shall serve to define reimbursement of expenses. The only exception to this Procedure would be the requirement to use the TMC online booking tool.
ENTERTAINMENT

Employee Recognition

To be reimbursable, items given to colleagues in recognition should be non-cash, nominal in value, and given infrequently. (See also: “Gift cards” and “FAQ’s”)

Celebrations

Personal celebration costs are not a reimbursable expense (e.g., birthdays, baby/wedding showers, etc.). Individuals attending must cover their own food/beverage or contribute to the overall cost. Rare occurrences, such as a Farewell or Retirement event, will only be reimbursed if it is company-sponsored. Gifts are not a reimbursable expense.

OTHER

Meetings/Seminars/Conferences

All hotel contracts containing sleeping room blocks must be reviewed and signed by the Corporate Meeting Services office. A sleeping room block consists of 10 or more overnight hotel rooms. Colleagues are not allowed to claim meeting planning reward points for any corporate event.

(See also: separate “Supplier Code Of Conduct Policy”)

All Council and System Office meetings, along with conferences, must be planned and organized through the Trinity Health Corporate Meeting Services Office. One annual ELT sponsored Functional Council is acceptable and must be approved in advance. Any additional meetings must be approved as appropriate, and submitted using the Meeting Planning Form.

Meetings should be held in a Trinity Health Ministry or Subsidiary facility conference room. When necessary, participation in off-site seminars and conferences should be limited to locations within the continental United States. Travel outside the continental United States is only appropriate for required offshore insurance meetings.

(See also: “Meals”)

Cellular Phone

(See also: separate policy for cell phone)

Flowers

A modest flower purchase from a department is acceptable and reimbursable when a colleague is hospitalized, or if there is a death of an immediate family member or colleague.

(See also: “Appendix D – Frequently asked questions” for immediate family member definition)

Flowers purchased for Boss’ day, Administrative Assistant’s day, birthday, just having a bad day, as a thank you, etc. are considered a personal expense and are not reimbursable.
**Gift Cards**

Due to IRS scrutiny and taxability, as well as internal control considerations, gift cards of any type or any denomination purchased for or given to colleagues are not reimbursable.

Gift cards given to a patient in connection with patient dissatisfaction with service, inconvenience or an incident implicates both the federal anti-kickback statute and the civil monetary penalties provision of the Social Security Act, which prohibits inducements to Medicare or Medicaid beneficiaries (the “Inducement Law”). Incentives nominal in value ($10 or less, not to exceed $50 annually) are allowable under the “Inducement Law” but trigger an obligation to track and report in connection with the Medicare secondary payer reporting requirements. For this reason, providing gift cards to patients is discouraged, and may only be provided as part of a written Patient Assistance program that has approval from both the Trinity Health Legal Department and Trinity Health Integrity and Audit Services Department.

Gas cards provided to external candidates interviewing for Trinity Health positions, or for participation in recruiting events, are reimbursable.
APPENDIX A – CONTACTS

Travel Agency:
Conlin Travel
Business Hours: Monday through Friday
8 a.m. to 8 p.m. EST

Direct Dial to Executive Accounts
24 Hour Emergency Afterhours Service (after 8 p.m. EST)
Executive Accounts Fax
800-783-9559 734-677-3134

eTravel Services (for online technical inquiries)
Business Travel HUB/Online Access
www.trinityhealthtravel.com
888-387-3536

Corporate Travel:
Cynthia Owens 734-343-0846
cynthia.owens001@trinity-health.org
Corporate Travel Office
Monday through Friday
8:00 a.m. to 4:30 p.m. EST

Payroll:
Kim Jones (Livonia) 734-343-1331
kim.jones001@trinity-health.org
Payroll Specialist
Monday through Friday
6 a.m. to 3 p.m. EST

TBD (Newtown Square) 610-355-2015
jdibeneditto@che.org
Administrative Clerk
Monday, Wed, Friday
8:30 a.m. to 5 p.m. EST

Internal Audit:
Brande Johnson 734-343-2011
brande.johnson@trinity-health.org
Administrative Assistant
Monday through Friday
8 a.m. to 4:30 p.m. EST

Supply Chain Management:
Elizabeth Garpiel 734-343-0196
elizabeth.garpiel@trinity-health.org
Administrative Assistant
Monday through Friday
8:00 a.m. to 4:30 p.m. EST
**APPENDIX B – DAILY MEAL MAXIMUMS**

Effective October 1, 2014, for all locations except high cost locations $56

<table>
<thead>
<tr>
<th>State</th>
<th>City and/or County</th>
<th>Daily meal maximum</th>
</tr>
</thead>
<tbody>
<tr>
<td>AZ</td>
<td>Phoenix</td>
<td>$66</td>
</tr>
<tr>
<td></td>
<td>Scottsdale</td>
<td>$66</td>
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<tr>
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<td>$66</td>
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<tr>
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<td>$66</td>
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<tr>
<td></td>
<td>San Francisco</td>
<td>$66</td>
</tr>
<tr>
<td>CT</td>
<td>Bridgeport</td>
<td>$66</td>
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<tr>
<td></td>
<td>Danbury</td>
<td>$66</td>
</tr>
<tr>
<td>DC</td>
<td>District of Columbia</td>
<td>$66</td>
</tr>
<tr>
<td>FL</td>
<td>Boca Raton</td>
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<td>Cambridge</td>
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<tr>
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<td>Woburn</td>
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<tr>
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<tr>
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<tr>
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<td>Houston</td>
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</tbody>
</table>
APPENDIX C – NON-REIMBURSABLE EXPENSES (LIST IS NOT ALL INCLUSIVE)

- Auto repair for personal vehicles
- Cell phones and electronic accessories
- Child care/pet care/house sitting fees
- Clothing articles
- Daily commute miles (travel between home and office)
- Donations
- EasyPass Device Rentals
- Gasoline for personal vehicles
- GPS (global positioning devices)
- Gifts (including gift cards to colleagues, flowers, and gifts for Administrative Assistants Day, birthdays, Boss’ Day, thank you gifts, retirement gifts, etc.)
- Haircuts, manicures, shoe shines, massages
- Health clubs/other club charges
- Home maintenance
- In-room movies
- Laundry/Dry cleaning
- Lobbying expenditures
- Magazines or other personal reading material
- Meals and/or entertainment events that have no business purpose
- Mini bar items
- Optional travel or baggage insurance
- Personal articles, clothing or souvenirs
- Political contributions, including contributions to PACs
- Replacement of personal funds/property due to lost luggage
- Satellite radio and other in-car entertainment extras
- Tips/gratuities, outside of this Procedure
- Toiletries
- Towing of personal vehicles
- Traffic tickets or other vehicle citations
- Travel clocks
- Travel upgrades/traveler status upgrades
- Trip-It fees
- Tuxedo and gown rentals
- Vending machine purchases

List is subject to ongoing review and revision.
APPENDIX D – FREQUENTLY ASKED QUESTIONS (FAQ’S)

Why do I have to use the Trinity Health Travel Program? What value does it bring?

There are many benefits for having a managed travel program for Trinity Health. The Travel Management Company’s (TMC) travel tools automatically integrate system-wide policy with preferred suppliers offering the lowest fares, while also capturing the required data for enhanced vendor discounts that will be available to use system-wide. This maximizes Trinity Health’s ability to negotiate discounted rates with preferred suppliers and reduce travel expenses. Ensuring all travelers use one source for their travel needs allows Trinity Health to locate travelers and secure their well-being in the case of an emergency.

Everyone’s participation will better help our organization monitor colleagues’ whereabouts in the case of emergency, ensure best pricing and better stewardship of our travel dollars and ensure the best possible customer service. Exclusive use of a TMC is a matter of mandate, rather than choice for everyone. The reason for this is two-fold:

1. To guarantee best rates and significant cost savings
2. To enable strong relationships with established travel liaisons who will help us manage our itineraries flawlessly

Are there exceptions to using the corporate travel program?

The following situations are the only exceptions:

Non-Trinity Health sponsored events

In connection with learning and development plans, colleagues may attend conferences that are not organized by Trinity Health. These conferences may have specified hotels with special negotiated rates and/or room blocks that are not available in the Corporate Travel site. Colleagues can utilize these rates and still be compliant with the corporate travel program mandate. It is very important to retain the event documentation that includes the instructions on where/how to book your travel, and the negotiated rates. Attach this documentation, along with your receipts, to your reimbursement request and clearly indicate lodging was booked through the event. If room blocks are sold out, the traveler must reserve their room through their travel profile.

Continuing Medical Education (CME) physician travel

CME Physician travel is not recorded in the Trinity Health travel spend reporting. Physicians traveling for CME purposes should continue to book travel as they always have, and are not required to use the corporate travel website; however, IRS expense documentation and expense rules apply. Employed physicians that are not traveling for CME purposes are required to use the corporate travel program.
How do I combine personal and business travel?

Flights

To include personal days in a business trip, travelers must call a TMC agent to get the proper paperwork. The agent will first find a flight cost if you were only traveling for business and then reserve your flight to include personal days. If there is a cost difference, the traveler is expected to reimburse Trinity Health for the extra cost.

Hotels

First, make your reservation using the THTP online booking tool for business nights only. Then, call the hotel with your confirmation number and extend your stay to include your personal days. You will be reimbursed at the daily rate shown on the THTP itinerary confirmation.

Car rental

First, make your reservation using the THTP online booking tool for the business days only. Then, call the car rental location with your confirmation number and extend your rental to include your personal days. You will be reimbursed at the daily rate shown on the THTP itinerary confirmation.

What are some examples of calculating mileage reimbursement?

Driving to out of town trip destination – No air travel

- Normal daily work commute miles = 40 miles roundtrip

  Normal weekly commute miles = 200 miles for a full time colleague working 5 days (40 x 5 = 200)

  Colleague drives to Grand Rapids from Livonia System Office on Monday and returns home on Friday. Total trip miles driven = 274 miles from Livonia System Office to Grand Rapids.

  To calculate mileage, subtract the normal weekly commute miles (200) from the total trip miles driven (274) to calculate reimbursable miles. \((274 - 200 = 74\) reimbursable miles)

Driving to Airport for SAME DAY out of town trip

- Normal daily work commute miles = 40 miles roundtrip

  Roundtrip airport commute miles = 30 miles

  The roundtrip airport commute miles (30) are less than the roundtrip daily commute miles (40). There are no miles eligible for reimbursement.

- Normal daily work commute miles = 40 miles roundtrip

  Roundtrip airport commute miles = 50 miles
Subtract normal daily work commute miles (40) from the roundtrip airport commute miles (50) to calculate reimbursable miles. \((50 - 40 = 10 \text{ reimbursable miles})\)

**Driving to Airport for TWO DAY out of town trip – same principle applies for more travel days**

- Roundtrip airport commute miles = 50 miles

  Normal daily commute miles for one day = 40 miles

  Traveler must calculate normal daily commute miles for each day traveling. Total normal daily commute miles for two days = 80 miles \((40 \times 2 = 80)\)

  The roundtrip airport commute miles (50) are less than the roundtrip daily commute miles for two days (80). There are no miles eligible for reimbursement.

**What are my normal daily commute miles?**

Normal daily commute miles are the miles driven from your primary work location and home. Remote colleagues will use the defined local travel miles of 50 miles one way as their daily commute miles.

**What do I do if I have an accident or sustain damage to a car rental?**

Following an auto accident or sustaining physical damage to a rental vehicle, the System Office traveler would follow these steps:

1. Notify the traveler’s immediate manager that the traveler was involved in an auto accident, that a rental vehicle has sustained property damage, and/or to tell the manager that the traveler sustained any sort of bodily injury that requires medical treatment.

2. Promptly submit an electronic auto claim with ESIS, Trinity’s third-party claim administrator. Reporting to ESIS within 2-business days of the date of the accident or damage to a rental car is the rule of thumb.

**NOTE: If the Traveler is seriously injured and unable to report the claim to ESIS, that duty should fall to the traveler’s manager.**

a. The instructions for how to report an auto claim to ESIS are available through PULSE by first navigating to the Insurance & Risk Management Services page.

b. Click on the Risk Finance Button.

c. Click “Other Claims” located in the right-hand menu.

d. “Other Claims” allows you to see:

   i. The Auto Accident TPA Notice Form. The traveler completes the form providing all details about the accident;

   ii. The Auto Claim Reporting Bulletin: This Bulletin tells the traveler how to electronically report an auto accident and/or auto physical damage to a rental car (using the above form) to Trinity’s third-party claim administrator, ESIS.
e. For assistance with the claim reporting process, please contact Teresa Fassett or Barbara Cook in the Insurance & Risk Management Services department:
   i. teresa.fassett@trinity-health.org, 734-343-0901;
   ii. cookbj@trinity-health.org, 734-343-2004

**What do I do if I have an accident or sustain damage to my personal vehicle when traveling for business?**

When the System Office traveler has an accident while operating his or her personal vehicle within the course and scope of his/her employment, the System Office traveler would follow these steps:

1. Report the accident to the traveler’s manager and tell the manager whether the traveler sustained any sort of bodily injury that requires medical treatment.
2. Report the accident to the traveler’s own insurance carrier, and
3. The traveler would also report the accident to ESIS (using steps outlined in the above section).
4. Trinity’s auto liability insurance may apply over and above the traveler’s personal auto liability insurance limits.
5. Trinity does not cover, nor reimburse for, physical damage to an employee’s personal auto, or employee deductibles.
6. For assistance with the claim reporting process, please contact Teresa Fassett or Barbara Cook in the Insurance & Risk Management Services department:
   i. teresa.fassett@trinity-health.org, 734-343-0901
   ii. cookbj@trinity-health.org, 734-343-2004

**When is it acceptable to submit meal reimbursements?**

In conference

Travelers are expected to participate in meals and all other refreshments provided by the conference or event attending before purchasing food for any reason.

Out of conference

Travelers are expected to use good judgement and stay within the daily meal maximum as outlined in Appendix B of the Travel and Other Business Expense Procedure.

**When is it acceptable to submit expenses for meals including colleagues and/or non-colleagues, or for colleague or team recognition?**

Examples of non-reimbursable situations include:

- A manager and colleagues go outside their work area to continue a discussion over lunch.
- Colleagues decide to conduct business in the office over lunch and no external party is present. Colleagues may ask their assistants to arrange for lunch but colleagues are expected to pay.
• Team outings for holidays or special celebrations.
• Birthday cakes, doughnuts, bagels, etc.

Examples of reimbursable situations include:

• A significant non-routine team accomplishment occurs and the manager wishes to acknowledge by taking the group to celebrate. Business purpose must be documented and requires pre-approval of the direct manager.
• A team needs to work long hours on Trinity Health related business; food provided for the team to work late to finish the project is a reimbursable business expense, but should not occur frequently.

*Can I substitute groceries for meals?*

Yes, a grocery receipt can be submitted in lieu of meal costs as long as the following applies:
• There are only food items listed
• The total per day does not exceed the meal maximum enforced by the organization

*Can I substitute discounted airline club daily pass for meals?*

Yes, the cost of a discounted daily pass at an airport airline club can be submitted in lieu of the meal costs as long as the club pass cost plus all other meal costs for that day does not exceed the meal maximum enforced by the organization.

*When is it acceptable to submit expenses for colleague recognition events/items/lunches?*

Examples of non-reimbursable situations include:
• Monthly team lunches.
• Team outings for holidays, or special personal celebrations such as birthdays, life events, etc.
• Birthday cakes, doughnuts, bagels, etc.

Examples of reimbursable situations include:
• A significant non-routine team accomplishment occurs and the manager wishes to acknowledge by taking the group to celebrate. Business purpose must be documented and requires pre-approval of the direct manager.

*Who is considered an immediate family member?*

When are Internet charges appropriate?

Acceptable instances for internet charges include:

- Conference call participation
- Confidentiality of business information viewable by others
- Business need to work while traveling in flight

In all instances, a valid business reason must be proven and documented.