

Washington State Auditor's Office
Whistleblower Investigation Report

University of Washington

Report No. 1010631

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October 7, 2013



WASHINGTON
TROY KELLEY
STATE AUDITOR



**Washington State Auditor
Troy Kelley**

October 7, 2013

Michael K. Young, President
University of Washington

Report on Whistleblower Investigation

Attached is the official report on Whistleblower Case No. WB 13-012 at the University of Washington.

The State Auditor's Office received an assertion of improper governmental activity at the University. This assertion was submitted to us under the provisions of Chapter 42.40 of the Revised Code of Washington, the Whistleblower Act. We have investigated the assertion independently and objectively through interviews and by reviewing relevant documents. This report contains the result of our investigation.

Questions about this report should be directed to Whistleblower Manager Troy Niemeyer at (360) 725-5352.

Sincerely,

TROY KELLEY
STATE AUDITOR

cc: Richard Cordova, Executive Director of Audits
Governor Jay Inslee
Melanie de Leon, Executive Director, Executive Ethics Board

Whistleblower Investigation Report

State of Washington University of Washington

ABOUT THE INVESTIGATION

Our Office received a complaint asserting the University of Washington's GEAR UP Director invited administrative and data entry people to a conference in order to fill enough hotel rooms to receive an upgrade to the penthouse suite. It was also asserted the director does not choose the most economical means in which to travel.

BACKGROUND

The U.S. Department of Education provides six-year grants to states and partnerships to prepare high-poverty middle school and high school students to enter and succeed in college. This grant, Gaining Early Awareness and Readiness for Undergraduate Programs (GEAR UP), begins providing these services to the students by seventh grade and continues through high school. These grant funds are also used for college scholarships to low-income students.

The University of Washington's Office of Minority Affairs and Diversity is a grant recipient. As such, it administers the GEAR UP program mainly from its office in the Yakima Valley. At one time, this office managed three large GEAR UP grants that served the students in eastern Washington and Skagit Valley; it currently manages two GEAR UP grants. The director of this office and her staff are responsible for budget and project oversight, program management and contracts monitoring, as well as other duties.

Fourteen school districts partner with the GEAR UP program. Each employs a GEAR UP coordinator responsible for developing and implementing services and activities. Additionally, the program partners with various community organizations.

The laws governing how grant funds should be used to reimburse travel relate back to the policies in place at the entity receiving the grant; in this case, the University. The University's travel policies relate to the travel rules in the *State Administrative and Accounting Manual*.

ASSERTIONS

1. The University of Washington director of GEAR UP failed to follow travel regulations when traveling for business purposes.
2. The University of Washington director of GEAR UP used her position to secure special privileges for herself and her family when traveling for business purposes.

RESULTS

We found reasonable cause to believe improper governmental actions occurred.

During our investigation we reviewed the subject's travel documentation from October 2011 through September 2012 and interviewed witnesses and the subject. We found the subject made 27 trips for which she requested and was granted reimbursement for the costs of airfare, rental vehicles, airport parking, meals and, in most cases, hotel charges. In addition to the costs of these trips, the subject was reimbursed \$775.20 for mileage incurred on her personal vehicle for trips from March 1, 2012 through September 9, 2012. This is the result of our investigation:

Trips to Seattle	Dates of travel				
<p>The subject lives in Yakima; her home is approximately 148 miles from the University's Seattle campus. The subject flies from Yakima to Seattle to attend meetings, which also requires a rental vehicle for transport between the airport and campus. There are three daily flights between Yakima and Seattle, limiting the subject's ability to return home by air, requiring numerous overnight stays in Seattle. For overnight stays she requested reimbursement for hotels and meals. On the occasions when the subject did return to Yakima without an overnight stay, the average cost of these trips was \$350 for flight, car, meals, gas and airport parking in Yakima. This does not include the time spent waiting at the airport in Seattle for her return flight to Yakima. Although the subject stated flying is more efficient, we found occasions when her business in the Seattle area concluded three to five hours prior to her departure time, which would have allowed her to arrive home before her flight left Seattle had she elected to drive. The subject stated that it can be painful for her to drive; however, her mileage reimbursement document shows that she has driven roundtrip from Yakima to Richland and Wenatchee, 232 and 275 miles respectively.</p>	<ul style="list-style-type: none"> • October 14-15, 2011 • November 1 • November 9-10 • November 30-December 1 • September 9-10, 2012 • January 30-February 1 • March 12-16 • March 27-29 (Tacoma) • May 2-3 (Olympia) • May 7 • May 21 (Tacoma) • June 25 • July 19 • August 1-2 • August 28 • September 6-7 (Tumwater) 				
<p>Round trip vehicle transport from Yakima to Seattle:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;"><u>Personal vehicle</u></td> <td style="width: 50%;"><u>State Contract Rental (Hybrid)</u></td> </tr> <tr> <td>\$158.10</td> <td>\$100.00</td> </tr> </table> <p>(Approximate costs)</p>	<u>Personal vehicle</u>	<u>State Contract Rental (Hybrid)</u>	\$158.10	\$100.00	
<u>Personal vehicle</u>	<u>State Contract Rental (Hybrid)</u>				
\$158.10	\$100.00				
<p>We question whether flying to Seattle from Yakima, as opposed to driving, is the most economical means considering the limited number of flights and the cost incurred with these trips.</p>					
<p>State travel rules require the travel alternative that is most economical to the state and that the costs of traveling for the convenience of the traveler be absorbed by the traveler. The subject did not select the most economical travel alternative.</p>					

<p>Early arrivals and late departures</p> <p>We found the subject frequently arrived at least one day before an event and remained in travel status until the day following. Witnesses stated, in the case of national conferences, the subject would schedule a half-hour meeting the morning before an event starts at the event location so she could justify arriving early. Witnesses stated some of the meetings that involved local grant participants could have been held any time prior to traveling, saving the added expense of hotels and meals.</p> <p>One example was the subject's travel to a Portland event. She traveled to Seattle two days before the event for a meeting at the University, stayed overnight in Seattle and traveled to Portland one full day before the Portland event started and remained until the afternoon after the event concluded. When first asked why she traveled to Portland in advance of the conference, she stated she had meetings in Portland. However, when questioned further, she could not recall who she met with, where or when the meetings took place. She finally stated she was unsure whether she met with anyone. The cost of the trip was \$1,377.51.</p> <p>On another occasion, the subject flew to Seattle the night before she had two meetings at the University. The meetings were scheduled for 10:00 a.m. to 12:00 p.m. and 2:00 p.m. to 4:00 pm. The first flight from Yakima arrives in Seattle by 7:15 a.m. so there was no need for the subject to fly over the night before the meeting. Because the last flight to Yakima, other than an 11 p.m. flight, leaves around 5:00 p.m., the subject would not be able to make that flight if her meeting ended at 4:00 p.m., requiring an overnight stay in Seattle. Cost of this trip was \$840.40.</p> <p>A third example occurred when the subject flew to Seattle three days prior to the dates she was to attend a conference there. The subject paid \$250 to attend the last two days of a four-day conference. She attended meetings elsewhere the entire first day she was to attend the conference and did not attend the final hours of the final day of the conference as she had to leave in order to make her 5:10 p.m. flight home. When questioned about this trip, the subject stated she had a meeting the day before the conference, attended the first two days of the conference and had meetings the entire day of the third day of the conference. However, when we pointed out that she had only paid for the last two days of the conference, she stated she had attended a meeting on the second day from 10:00 a.m. to 3:00 p.m., but offered no explanation regarding what business she was involved with on the first day of the conference, stating only that she had the conference starting on the [date of first day].</p>	<p>Dates of Travel</p> <ul style="list-style-type: none"> • October 2011 (Seattle/Portland) • November (Seattle) • January 2012 (Seattle) • March (Seattle) • May (Olympia) • July (Washington D.C.) • August (Seattle) • September (Las Vegas)
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<p>Cost of this trip was \$1188.77, not including the conference fee.</p> <p>State travel rules require the traveler to be prudent and states that excess costs, circuitous routes, delays or luxury accommodations that are not necessary or justified are not acceptable. Additionally, the rules require the costs of traveling for the convenience of the traveler be absorbed by the traveler.</p> <p>The University's travel policy states that faculty and staff will not be reimbursed for excessive or unnecessary expenses.</p>	
<p>In-State Retreats</p> <p>During the time period of our review, the subject held three retreats. Two were held on the west side of the mountains. Only one staff member resides on the west side of the state and the remaining staff works in the same office, requiring the remaining staff to travel from the Yakima area to Blaine and La Conner. On both of these occasions the subject flew to Seattle and rented a vehicle to drive to the locations; the remaining staff drove to the retreat destination. The third was held in Leavenworth. In Leavenworth the hotel charge was \$95 per night per person, the allowable is \$77. At the Semiahmoo Resort in Blaine the cost for one night was \$169, the allowable is \$77. At Semiahmoo the cost for lodging and banquet charges (not meals) for eight people for two nights and two people for one night was \$4,726.</p> <p>Paying \$92 per night above the allowable nightly rate, without written justification for the excess expense, is a violation of state travel rules.</p> <p>State travel rules require the traveler to be prudent and states that excess costs, or luxury accommodations that are not necessary or justified are not acceptable. Additionally, travelers are encouraged to carpool whenever possible.</p> <p>The University's travel policy states that faculty and staff will not be reimbursed for excessive or unnecessary expenses.</p>	<p>Dates of Retreats</p> <p>March 2012 June 2012 July 2012</p>
<p>Hotels</p> <p>Witnesses stated the subject negotiated contracts with hotels in order for her to receive upgraded accommodations. Witnesses stated the subject finds out how many rooms need to be filled and for how many nights in order for her to receive an upgrade to a suite at no extra charge. Witnesses stated these hotels are not the conference hotels and, if anyone objects to staying at these hotels, the subject will threaten to not pay their hotel expenses. Witnesses stated that in order to fill the requisite number of rooms and nights, the subject would invite people who do not need to attend the conference, such as support staff and summer interns. Witnesses stated it is sometimes an inconvenience not to</p>	<p>Dates when subject exceeded the allowable hotel rates and the overage.</p> <ul style="list-style-type: none"> • October 14, 2011 \$52 • October 25 \$54* • November 9 \$12 • January 30, 2012

<p>stay at the conference hotels. The subject stated that she saves money by negotiating with the hotels.</p> <p>During the time frame of our investigation we found one occasion when the subject contracted with a hotel and was able to secure the presidential suite for herself. The subject stated she had family members accompany her on this trip. Although the room per night was less than the cost of the conference hotel, we found the list of attendees included summer interns and support staff. The contract was for 10 rooms for five nights; 9 junior suites and one presidential suite for \$9,675.25.</p> <p>We found the subject does not always negotiate contracts and many times has paid rates above the allowable per-night rate. We question whether there is any cost savings if rooms are rented for people who have no need to attend the conference and rooms are occupied longer than necessary for attending the conference.</p> <p>State travel rules require that the number of agency travelers to a particular event be kept to the minimum necessary to benefit from the event. They also require each agency to establish policies to restrict the number of travelers traveling to the same location.</p> <p>The University's travel policy states that minimum attendance is necessary in that the number of employees attending an event should be necessary and consistent with the benefit derived from attending the event.</p>	<p>\$45</p> <ul style="list-style-type: none"> • February 11 \$43* • April 17 \$ 5* • May 2 \$21 • June 18 \$18 • July 11 \$92 • August 1 \$50 • August 2 \$60 • September 6 \$51 <p>*Conference hotels. State travel rules allow higher rates at conference hotels.</p>
<p>ProCard Use</p> <p>Witnesses stated that, when attending national conferences, the subject requires attendance at a networking dinner, described by witnesses as "extravagant." Some witnesses stated they are uncomfortable spending grant money in this fashion but are afraid of suffering the consequences if they do not attend.</p> <p>One such dinner occurred during the conference in Washington D.C., referenced above. The documents submitted for this dinner show a total cost of \$1633.80. The cost of the meal was divided among three ProCards, credit cards that are paid directly from grant funds. One of these charges was for \$376.01 for "beverages." The beverages were to have been charged to discretionary funds from the grant; however, this did not occur. The list of dinner attendees was submitted along with the restaurant receipts and named 39 people as having attended the dinner. Each person in travel status received a per-meal allowance (per diem). In the case of dinner in Washington D.C., the allowance was \$32. Dividing the total dinner bill among 39 people would make everyone nearly \$10 over per diem.</p>	<p>Networking Dinner</p> <p>July 2012</p>

<p>However, during our investigation we found that at least 10 of the people listed did not in fact attend the networking dinner. Two of the listed attendees are relatives of the subject and are not involved with the grant. Witnesses stated that in order to compensate for the overspending at these dinners the subject will add the names of people to the list who actually did not attend the dinner.</p> <p>According to a witness from the Department of Education, grant funds may be used for alcohol but the charges cannot exceed the per diem.</p> <p>State travel rules do not allow for reimbursement for alcohol, nor does it allow the use of a ProCard for alcohol purchases, unless permitted by statute or rule.</p> <p>State travel rules do not authorize paying for food or beverages consumed by the state traveler's relatives with public funds. In addition, the subject violated state law when she extended a special privilege to her relatives by paying for their meals with the ProCard.</p>	
<p>Reimbursements We found several instances when the subject paid for and was reimbursed for more days of airport parking than was necessary for the trip because, according to her, she was unable to calculate how many days she needed to pay for parking.</p> <p>In many instances she claimed and was reimbursed for mileage to and/or from work when she did not drive to work because she began or ended her trip from home; a 20-mile difference.</p> <p>The subject also claimed and was reimbursed for meals that were provided at a conference, during a tour, and when she was not in travel status.</p> <p>One example occurred when she participated in a tour of Washington D.C. with 14 students and three other adults. This tour was for five days and every breakfast and dinner was provided by the tour sponsor. The subject claimed and received reimbursement for every meal, other than those charged to the ProCard.</p> <p>The subject stated she had assistants who prepared her travel vouchers and she did not provide them instruction on when or where she started or ended her trips, which is what the per diem and mileage would be based on. She also advised that she did not review the vouchers before she signed them. The subject's assistants stated they would prepare the subject's vouchers based on her ProCard bills, the conference itineraries and flight information.</p>	<p>Over-reimbursements (Dates are start dates and may not be the date of overpayment.)</p> <p>Meals</p> <ul style="list-style-type: none"> • October 25, 2011 • February 25, 2012 • March 12 • March 21 • March 27 • May 2 • May 7 • May 21 • June 18 • June 25 • July 3 • July 13 • August 1 • August 7 • August 28 <p>Mileage</p> <ul style="list-style-type: none"> • October 14, 2011 • January 9, 2012 • February 11 • February 25 • March 12 • March 21

<p>Regarding her start and end locations, they advised that the University advises that if a trip begins or ends during the week, the beginning and ending location is the work station. If it starts or ends on a weekend, it's the home. The subject stated that she mostly starts her trips from home since it is approximately five miles from the airport. We also found the subject would claim dinner meals when she was home at or very near 6:00 p.m., the beginning of the dinner hour.</p> <p>We question whether someone should be reimbursed for dinner when they are home during the dinner hour or reimbursed for breakfast when they begin their trip at 8 a.m. We also question whether someone should be reimbursed for miles they did not drive during a trip.</p> <p>State travel rules do not allow reimbursements for meals when meals, other than continental breakfasts, are provided at a conference. For non-overnight trips, the traveler must be in travel status the entire meal period in order to be reimbursed for that meal.</p>	<ul style="list-style-type: none"> • April 17 • May 2 <p>Airport parking</p> <ul style="list-style-type: none"> • February 11, 2012 • August 7 • September 16
<p>Ground Transportation</p> <p>During our investigation, we found costs for rental vehicles and taxis high, considering the fact that for the most part the subject stayed at conference hotels. In addition to ground transportation when in other states, the subject rents vehicles each time she flies to Seattle for her meetings.</p> <p>On two occasions while in Las Vegas, the subject rented a vehicle. The first occasion she purchased optional coverage that was not reimbursable yet she received reimbursement. The cost for the rental was \$357.15 and the subject drove 26 miles. The second rental in Las Vegas cost \$233.99 and the subject drove 144 miles. Although the subject's travel documents show she left for Las Vegas on Sunday, the rental car documents show she picked it up on Saturday and returned it to the rental car lot after she was already in flight for Seattle. After pointing these issues out to the subject, she stated she flew out on Saturday, not Sunday, but was unable to clearly explain how the rental vehicle was checked in after her flight took off. Although her explanation was that the plane was delayed, she would still have had to drop off the vehicle prior to departure and the vehicle check-in was still after her departure. Because of her early pick-up and late drop-off, the University was charged for one week's rental when it should have paid for four days maximum. When questioned whether the 144 miles driven was related to work, the subject first stated that she drove to local schools involved with the GEAR UP grant, but when questioned further, stated she could not remember what schools, and finally, that she had looked for a school but could not find it.</p> <p>We found the subject often used taxis during specific times</p>	<p>Costs of ground transportation (not including rentals based in Seattle)</p> <ul style="list-style-type: none"> • N.Y. October 2011 \$380.15 • N.Y. February 2012 \$290.00 • Las Vegas February 2012 \$357.15 (\$121.92 nonreimbursable) • CA April 2012 \$122.20 • Washington D.C. July 2012 \$274.20 • Washington D.C. August 2012 \$ 89.00 (According to the tour contract, all ground transportation was provided. The subject could not recall why she used taxis and had no meetings)

<p>conference presentations were in session, indicating that she did not attend portions of the conferences. The subject stated she does have meetings during conferences because this is the time when people are available to meet.</p> <p>Regarding the subject's second trip to Las Vegas, the subject violated the travel rules when she picked up the rental vehicle a day early for her own personal use. State travel rules state that rental vehicles are to be used for official state business. When a traveler couples a personal vacation with official state business, the traveler is expected to execute a personal contract for that portion of the trip.</p>	<p>scheduled on her calendar.)</p> <ul style="list-style-type: none"> • Las Vegas September 2012 \$233.99 <p>Total Seattle rentals \$1274.85 (This does not include the rentals that were billed to the assistant director who accompanied her on numerous trips.)</p> <p>NOTE: The principal investigator's taxi fares for the April CA trip was \$303.60</p>
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We spoke with the Department of Education's GEAR UP Director to get an understanding of what travel is required by the subject and her staff. The director stated there are two national conferences each year that must be attended by the state program director and the principal investigator and they are required to take six additional people from their school districts, such as teachers, superintendents, principals; the people involved with the work of the grant. Regarding taking the same people year after year and taking support staff, the director stated the decision is up to the subject but the Department of Education would not encourage taking support staff and there is more of a benefit to the program to take different people. Regarding the subject's statement that she needs to attend two conferences per grant, the director stated that is incorrect; there are only two required conferences each year regardless of the number of grants.

In general, witnesses stated the subject was in travel status a great deal of the time. Witnesses overwhelmingly stated that instead of extensive travel, the money could have been spent on the intended use – the students.

RECOMMENDATION

We recommend the University review the subject's travel for the time of our investigation as well as her travel for years prior, to determine whether she was reimbursed for costs for which she was not entitled. Also, the University should ensure that when traveling for her own convenience, the subject use her own funds and, where appropriate, her annual leave.

UNIVERSITY'S PLAN OF RESOLUTION

We appreciate the State Auditor's diligence in reviewing the information during the course of this investigation and providing to the University the information contained in this report. Additionally, based on this information, the University has begun a review of current travel policies and expenditures within the GEAR UP program.

While we believe that many of the trips indicated in this report were undertaken for valid reasons in support of the GEAR UP grant, and that most of the costs incurred were valid under University, State and Federal travel reimbursement policies; the University will initiate a review of the subject's travel and travel related expenditures for the last three years. We will also review the level of reimbursement for costs to ensure only those costs allowable under University, State and Federal travel policies have been reimbursed to the subject. Should in the course of this review we identify any costs which were inappropriately charged to State or Federal grant budgets, we will take immediate action to either move those to allowable University budgets or request reimbursement from the subject.

We will require the subject and all of the GEAR UP staff attend additional training on University, State and Federal travel reimbursement policies and related regulations. We will also see that this training includes information on personal travel and leave in conjunction with authorized University travel.

STATE AUDITOR'S OFFICE REMARKS

We thank University officials and personnel for their assistance and cooperation during the investigation.

Whistleblower Investigation Criteria

State of Washington University of Washington

We came to our determination in this investigation by evaluating the facts against the criteria below:

Assertion 1:

34 CFR §74.27 Allowable costs.

(a) For each kind of recipient, there is a set of cost principles for determining allowable costs. Allowability of costs are determined in accordance with the cost principles applicable to the entity incurring the costs, as specified in the following chart.

For the cost of a—	Use the principles in—
Private nonprofit organization other than (1) An institution of higher education; (2) a hospital; or (3) an organization named in OMB Circular A-122 as not subject to that circular	OMB Circular A-122.
Educational institution	OMB Circular A-21.
Hospital	Appendix E to 45 CFR part 74.
Commercial for-profit organization other than a hospital and an educational institution	48 CFR part 31 Contract Cost Principles and Procedures or uniform cost accounting standards that comply with cost principles acceptable to ED.

Circular A-21 - Subject: Cost Principals for Educational Institutions.

J. General provisions for selected items of cost.

53. Travel costs.

a. General.

Travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the institution. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the

trip, and results in charges consistent with those normally allowed in like circumstances in the institution's non-federally sponsored activities.

b. Lodging and subsistence.

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, shall be considered reasonable and allowable only to the extent such costs do not exceed charges normally allowed by the institution in its regular operations as the result of the institution's written travel policy. In the absence of an acceptable, written institution policy regarding travel costs, the rates and amounts established under subchapter I of Chapter 57, Title 5, United States Code ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter shall apply to travel under sponsored agreements (48 CFR 31.205-46(a)).

University of Washington – Administrative Policy Statement 70.2 (General Travel Policies).

1. The Basis for the University's Travel Rules and Regulations

The University's travel rules, regulations, and procedures are based on state travel law, as provided in Chapter 43.03 RCW. The statewide requirements covering the general administrative practices to be observed by state agencies are described in the State Administrative and Accounting Manual, published by the state of Washington's Office of Financial Management. At the University of Washington, authority for this area rests with the Executive Vice President as provided by Executive Order No. 5, and is overseen by the Travel Office under the direction of the Assistant Controller for Financial Services.

The state of Washington holds the University accountable for the administration of all travel funds in accordance with state regulations and whatever internal rules the University may establish to assure the proper use of such funds. Accordingly, expenditures of grant and contract funds for travel are subject to the same regulations as expenditures from state general funds, except where specifically noted.

In addition, individual units within the University, as headed by a dean or vice president, may adopt departmental methods of complying with the University's travel rules and regulations. In general, these methods apply to approval procedures and reimbursement requirements.

4. Responsibility to Minimize Travel Costs

Faculty and staff members are expected to exercise restraint in incurring travel expenses. Excessive or unnecessary expenses will not be reimbursed. Should a question arise regarding the method of reimbursement to be allowed an employee under these regulations, the University is obliged to select the option that is most economical to the state. The travel method selected is not to be influenced by the personal travel plans of the employee.

Departments are also responsible for adhering to the following policies:

a. Elimination of Unnecessary Travel

The itinerary of an employee is to be planned to eliminate unnecessary travel in the performance of work assignments.

b. Minimum Attendance Necessary

The number of University employees attending a particular meeting should be the minimum necessary, consistent with the benefit to be derived therefrom.

RCW 43.03.050 Subsistence, lodging and refreshment, and per diem allowance for officials, employees, and members of boards, commissions, or committees.

(1) The director of financial management shall prescribe reasonable allowances to cover reasonable and necessary subsistence and lodging expenses for elective and appointive officials and state employees while engaged on official business away from their designated posts of duty. The director of financial management may prescribe and regulate the allowances provided in lieu of subsistence and lodging expenses and may prescribe the conditions under which reimbursement for subsistence and lodging may be allowed. The schedule of allowances adopted by the office of financial management may include special allowances for foreign travel and other travel involving higher than usual costs for subsistence and lodging. The allowances established by the director shall not exceed the rates set by the federal government for federal employees. However, during the 2003-05 fiscal biennium, the allowances for any county that is part of a metropolitan statistical area, the largest city of which is in another state, shall equal the allowances prescribed for that larger city.

State Administrative and Accounting Manual (SAAM) 10.10.15 – Responsibilities of travelers.

A traveler on official state business is responsible for:

1. Being familiar with state and agency travel and transportation regulations before embarking on travel.
2. Exercising the same care in incurring expenses and accomplishing the purposes of the travel that a prudent person

would exercise if traveling on personal business. Excess costs, circuitous routes, delays, or luxury accommodations unnecessary or unjustified in the performance of official state business travel are not acceptable.

3. Paying any excess costs and any additional expenses incurred for personal preference or convenience.

4. Returning as promptly as possible to either the official station or official residence when the state business is completed.

5. Securing prior authorization for travel when required. (Subsection 10.10.50)

6. Preparing the Travel Expense Voucher and providing appropriate receipts and documentation as required in Section 10.80 and other sections of this chapter.

State Administrative and Accounting Manual (SAAM) 10.10.20 – These criteria must be used for selecting and approving travel.

In addition to complying with state travel policies and procedures, an agency head or authorized designee must use the following criteria to determine whether to authorize a person to travel on official state business, and to determine what travel alternatives to authorize.

1. Select the travel alternative that is most economical to the state.

10. When meetings or conferences are necessary, agencies should consider cost to the state, accessibility to attendees, and other relevant factors in their selection. First priority is to be given to using state-owned or other public owned facilities in lieu of renting or leasing private facilities.

The location and facilities for all conferences, conventions, training sessions, or meetings held or sponsored by the state are to be barrier-free in accordance with Section 50.50.

When a conference, convention, training session, or meeting held or sponsored by the state is conducted at a rented/leased non-state facility, the person responsible for the choice of location and facilities is to submit justification in advance in writing to the agency head or authorized designee for approval. The justification is to include:

- The purpose and objective of the meeting;
- The name of the organizations or persons expected to attend and an estimate of the attendance;
- An estimate of the anticipated cost to the state to include travel costs of travelers; and

- An explanation why state-owned or other public owned barrier-free facilities cannot be used. Limit the number of persons from an agency attending a particular conference, convention, meeting, or training session to the minimum necessary to benefit from the event.

State Administrative and Accounting Manual (SAAM) 10.20.40 – How travel for the convenience of the traveler affects reimbursement.

d. If a traveler would like to couple a vacation or other personal use onto a legitimate business trip:

It is allowed WHERE ALL OF THE FOLLOWING CONDITIONS EXIST:

- The primary purpose of the trip is official state business;
- The traveler uses, where necessary, his or her approved leave for the vacation or personal part of the trip; and
- The state agency does not incur any extra expenses beyond what it would normally incur had the trip occurred without any personal use coupled to the trip.

State Administrative and Accounting Manual (SAAM) 10.30.10 – What is the basis for reimbursing lodging costs?

a. Reimburse lodging expenses at actual costs, as evidenced by a receipt, up to the specific daily maximum allowable lodging rate in effect at the time of travel for the specific area or locality, unless:

- An exception is specifically provided by statute, or
- Authorized by Subsection 10.30.20.

Refer to Subsection 10.20.30 for the maximum allowable lodging rates for the Continental USA (CONUS).

Travelers may be reimbursed taxes paid on lodging in addition to the Maximum Lodging Amounts contained in Subsections 10.90.10 and 10.90.20 (PDF file). Code the payment of taxes on lodging as lodging expense, Subobject GA or GF, as applicable. Refer to Subsection 10.90.10.d for rules on lodging taxes for the Non Continental USA and Foreign locations.

State Administrative and Accounting Manual (SAAM) 10.40.10 – What is the basis for reimbursing meal costs?

a. Reimbursement for meal expenses is on an allowance basis not to exceed the amounts in effect at the time of travel, unless:

- An exception is specifically provided by statute, or
- As authorized by Subsection 10.40.20.

The meal allowances for the Continental USA are stated in Subsections 10.90.10 and 10.90.20 (PDF file). The meal allowances for areas outside the continental USA are stated in Subsection 10.90.20 (PDF file).

Reimbursement for meal expenses incurred at the traveler's official station or official residence is prohibited, except:

1. As provided for under the provisions of Subsection 70.15.10 and Subsection 60.20.10.
2. In emergency situations when the agency head determines that employees performing critical agency functions must remain at their work stations. When an employee, acting in a custodial or leadership role, must, as part of their duties, dine with students or other clients of the agency (i.e. higher education coaches dining with student athletes).

b. Reimbursement for meal expenses is not to be authorized when a traveler does not incur expenses for meals because they are furnished.

c. Where identifiable costs of meals are included in the lodging rate or registration fee of a meeting, conference, convention, or formal training session, the meal costs, not to exceed the designated meal allowances found in Subsections 10.90.10 and 10.90.20 (PDF file), are to be deducted from the traveler's allowable travel reimbursement amount. If the included meal costs are not specifically identified, agencies are not to pay the traveler the meal allowances.

d. See Subsection 70.15.20 for situations where meals with meetings cannot be reimbursed.

For overnight travel assignments, the agency-determined meal periods are used to determine when a traveler is entitled to a meal.

b. For non-overnight travel assignments, the following two criteria must be met to receive a meal allowance:

1. Three Hour Rule

A traveler may be reimbursed for meal expenses only after the traveler is in travel status for three hours beyond the traveler's regularly scheduled working hours for any one day. The three

hours may consist of hours occurring before, after, or a combination of both before and after the traveler's regularly scheduled working hours for the day.

This requirement is not applicable to the reimbursement provisions of Subsection 70.15.10 (meals when not in travel status), nor to the provisions of Subsection 10.70.20 (option 1) and Subsection 10.70.30.b (option 1) (travel of members of boards and commissions).

1. In travel status during the entire meal period

Travelers must be in travel status during the entire agency-determined meal period(s) in order to qualify to collect *meal* payments for meal(s), except as provided in Subsection 70.15.10. The traveler may not stop for a meal just to meet the three hour rule.

Assertion 2:

RCW 42.52.070 Special Privileges.

Except as required to perform duties within the scope of employment, no state officer or state employee may use his or her position to secure special privileges or exemptions for himself or herself, or his or her spouse, child, parents, or other persons.

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