

Travel Expense Reporting and Reimbursement Audit

City Internal Auditor's Office

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2024



File#: 24.01

| Executive Summary

Why We Did This Audit

The decision to conduct this audit stems from our commitment to ensuring transparency, accountability, and the responsible use of public funds within the City. As the City's annual expenditure for travel and training exceeds one million dollars, it may be beneficial to manage these expenses effectively to avoid any potential public perception risks. Past travel expense issues have demonstrated the need to assess current procedures, identify weaknesses, and recommend improvements to enhance operational efficiency and public confidence in the City's financial management practices.

What We Found

We reviewed the City's travel expense reporting policies, procedures, and practices to determine the effectiveness of the controls in place for detecting and preventing inappropriate activities. Our evaluation primarily focused on assessing the risks associated with fraud, waste, and abuse. After careful analysis, we identified some areas that could be improved in the travel expense reporting and reimbursement process:

Methods for policy communication could be enhanced. The City Policy is a comprehensive guide for managing travel expenses, ensuring responsible use of resources, improving cost management, and streamlining processes. However, the lack of employee awareness is a significant challenge that may hinder the policy's effectiveness in preventing maleficence.

The practice of supervisory review needs to be consistent. While more could be done centrally to enhance the review process, the key control lies in supervisory review. However, inconsistencies in supervisory practices across departments pose a risk, with the potential for material losses if the practices are left unaltered.

More accurate data is needed to determine the cost-benefit of adopting a per diem plan. We identified that employees have consistently failed to provide substantiating documentation for the daily meal allotments, making it difficult to determine if the City would benefit from utilizing a per diem plan. A more comprehensive evaluation can be conducted by collecting accurate data for a period of one year. To support this, supervisors must facilitate employees submitting substantiating documentation with expense reports.

High risk expense reports need to be thoroughly scrutinized. While it is essential to scrutinize all expense reports thoroughly, Finance may not have the resources to review every report in detail. Therefore, it is recommended that management focuses their efforts on the high-risk expense reports. By prioritizing these expense reports, management can effectively allocate its resources to areas that pose the most significant risk, increasing the likelihood that wrongdoing is detected.

Policies on remote work and professional development should be codified. Currently, the City does not have a written policy on remote work expectations. This, coupled with employee-initiated professional development, may create an opportunity for misconduct. For instance, an employee may extend their stay without taking adequate vacation time under the pretext of remote work.

Recommendations

To address the audit findings, there are a few improvements the City could make to better manage the travel expense reporting and reimbursement process. They are encompassed in the following audit recommendations:

- 1. Enhance Policy Communication.** The City's travel expense policy is comprehensive to ensure that it contains all the necessary information to be effective. However, due to its length, many employees do not comprehend all of the requirements. To address this issue, management should work with Public Communications to explore new ways to communicate the policy more effectively to employees. Possible options could include: (1) a condensed policy summary, (2) an interactive document guide, (3) a training video, (4) a process document detailing all steps an employee should take from pre-approval to submission, (5) a frequently asked questions sheet or (6) an electronic smart form.
- 2. Rework the Travel Expense Report.** Management should consider reworking the travel expense report to enhance the review process. For instance, a projected daily meal allotment could be added, along with a field to indicate if the employee intends to utilize vacation time to prolong their stay. Additionally, a section could be included to specify the GSA lodging rate, allowing reviewers to assess the reasonableness of the expense. Lastly, a differentiation could be made between the length of absence and the length of the event.
- 3. Further Data Should be Gathered on Meal Expenses.** Without employees submitting the appropriate substantiating documentation, the audit team cannot accurately assess whether the City should adopt a per diem plan. Following a future consistent submission of substantiating documentation, Finance should analyze meal expenses to be provided to the CMO. In so doing, an informed decision can be made whether to transition to a per diem plan or retain the existing accountable plan.
- 4. Greater Scrutiny Should be Given to High-Risk Expense Reports.** Management should develop criteria to identify high-risk expense reports that need focused scrutiny, as well as training and processes necessary for staff or supervisors to adequately review them. The criteria could include but are not limited to (1) The travel is out-of-state, (2) a spouse or non-employee is traveling with the employee, (3) the date of absence exceeds the appropriate travel time for the conference/event, (4) the employee is among the highest spenders, or the total cost of a trip exceeds a set amount, (5) evidence of missing conference sessions and/or, (6) training is loosely related to the employees' job responsibilities.
- 5. Codify Policies on Remote Work.** While the City currently prohibits remote work, there is no written policy. This could lead employees to exploit this ambiguity for their benefit. The CMO should develop a policy giving clear directives about the expectations of remote work.
- 6. Ensure Department Consistency for Selecting Professional Development.** The CMO should set clear guidelines for department directors to establish a baseline for professional development, ensuring alignment with department needs and employee development plans. Additionally, clear expectations should be communicated, emphasizing that employees should not travel for training outside their job responsibilities.
- 7. Finance Should Investigate Possible Technology Solutions.** Travel cards, the MUNIS expense claim application, and continuous monitoring software offer opportunities to make Finance's management of the travel expense reporting process more efficient and impactful. Finance should research possible technology solutions to assist in monitoring travel expenses.

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Introduction

The Office of the City Internal Auditor conducted this performance audit of the City of College Station’s (the City) travel expense reporting and reimbursement process pursuant to Article III Section 30 of the College Station City Charter, which outlines the City Internal Auditor’s primary duties.¹

A performance audit is an objective, systematic examination of evidence to assess independently the performance of an organization, program, activity, or function. The purpose of a performance audit is to provide information to improve public accountability and facilitate decision-making.² Performance audits encompass a wide variety of objectives, including those related to assessing program effectiveness and results; economy and efficiency; internal control; compliance with legal or other requirements; and objectives related to providing prospective analyses, guidance, or summary information. A performance audit of the City’s Travel Expense Reporting and Reimbursement Process was included in the Fiscal Year 2024 Audit Plan based on the direction given by the Audit Committee. We investigated whether instances of fraud, waste, or abuse were occurring in the City’s travel expenses.

1. Fraud	Intentional acts that involve the use of deception, misrepresentation, or other unethical means to obtain a financial or personal gain or to cause a loss to an organization.
2. Waste	Unnecessary, careless, or inefficient use of an organization's resources.
3. Abuse	Behavior that is inconsistent with acceptable business and ethical standards, leading to the misuse or excessive use of an organization's resources.

Travel Expense Background

The City operates under a policy that supports its employees by reimbursing or directly covering expenses incurred during official travel for City business, encompassing conferences, training sessions, meetings, and other job-related events. In 2022, U.S. organizations invested over \$100 billion in training and professional development activities, highlighting the widespread recognition of their value. Beyond acquiring new skills and industry insights, these initiatives empower employees to contribute innovative ideas and knowledge-sharing within their teams. By actively funding travel and training, the City not only enhances individual professional growth but also signals a commitment to the overall well-being of its workforce. This strategic investment contributes to a positive organizational culture, fostering increased morale, job satisfaction, increased performance, and employee retention, as it communicates a clear dedication to its staff’s ongoing development and career progression.

The process for submitting expense reports and reimbursement requests related to day trips or overnight travel involves every department and employee in the City that engages in such activities. As per the policy, directors are responsible for budgeting, managing, and approving expenses for their staff’s training, memberships, conferences, and meetings. Meanwhile, employees are responsible for providing expense estimates, attaching supporting documentation, and obtaining approval before making travel arrangements.

During the travel, employees are expected to make expenses using a P-Card/D-Card unless it is unavailable; in this case, they can get reimbursed later. While on a trip, they must obtain itemized receipts and attach them to their travel expense reports upon returning. To complete the process, employees must enter the expenses incurred during travel and submit them to their supervisor for review before uploading all the documentation to MUNIS. Employees who do not comply with this policy may be subject to delay in or withholding of reimbursements and disciplinary action in the form of suspending or terminating their P-card/D-card privileges.

¹ City of College Station, TX, “Code of Ordinances,” § 30 (2017), 12.
² U.S. Government Accountability Office, “Government Auditing Standards 2018 Revision (GAO-18-568G)” (2018), 10–17.

Table 1: FY23 Travel and Training Expenditures by Department

Department	Budget ³	Outside Training	Travel	FTEs	Per FTE
Electric	\$282,940	\$112,666	\$55,203	91	\$1,845
Police Department	\$282,300	\$160,052	\$118,415	226	\$1,232
Fire Department	\$149,064	\$112,717	\$20,354	174	\$765
Economic Development/Tourism	\$135,106	\$17,007	\$68,917	18	\$4,774
Information Technology	\$94,094	\$10,976	\$19,719	32.25	\$952
Fiscal Services	\$82,616	\$10,207	\$14,330	49	\$501
Public Works	\$80,768	\$9,969	\$16,070	105	\$248
Parks & Recreation	\$80,131	\$17,501	\$15,560	72	\$459
Planning & Development	\$59,649	\$37,902	\$4,685	46	\$926
Water Services	\$49,300	\$59,506	\$13,119	90	\$807
Fleet	\$28,475	\$6,406	\$11,263	18	\$982
City Council	\$25,800	\$4,525	\$19,983	*7	\$3,501
City Manager's Office	\$21,101	\$4,920	\$11,862	10	\$1,678
Human Resources	\$18,170	\$10,556	\$4,183	18	\$819
City Attorney	\$17,057	\$4,925	\$6,210	11	\$1,012
City Secretary	\$16,600	\$980	\$2,847	5.5	\$696
Community Services	\$12,996	\$3,874	\$389	22	\$194
Capital Improvement Projects	\$10,000	\$4,706	\$5,015	20	\$486
Public Communications	\$7,878	\$80	\$1,506	8	\$198
Municipal Court	\$5,865	\$7,385	\$6,522	20.75	\$670
Audit	\$3,885	\$4,222	\$1,156	2	\$2,689
Total	\$1,463,795	\$601,085	\$417,307	1038.5	\$981

*The City Council consists of 7 volunteer positions.

The City's Travel and Training Expense Program budget and spending habits vary significantly by department, as each department has its own unique training requirements and needs (See **Table 1**). Certain professions within the City's various departments may necessitate ongoing educational requirements to maintain licenses or certificates. For instance, Professional Engineers (PE) in Texas are required to complete 15 professional development hours every year, whereas licensed Texas Certified Public Accountants (CPA) must complete 40 hours on average a year. On average, the City spends **\$981 per FTE** on travel and training expenses. How these funds are expended on each employee is left up to the discretion of the respective department director, who pre-approves all training and travel expenses for an employee.

³ Total budget for outside training and travel.

Audit Objective

The purpose of the audit is to evaluate the employee travel expense reporting and reimbursement process for the effectiveness of controls and compliance with City policy and procedures. The City's controls are intended to provide reasonable assurance but cannot guarantee that fraud and errors will not occur. We assessed the effectiveness of the travel expense reporting and reimbursement process by answering the following:

- Are past behaviors identified in previous audits still prevalent in current travel expenses?
- Are City departments and their employees in compliance with City's travel policies and procedures?
- Are the travel and expense reporting and reimbursement internal controls effective at preventing fraud, waste, or abuse?

Scope

The City Internal Auditor's Office conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). Those standards require that the audit team plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The audit focuses on the policies and procedures used in the governance, management, control, and oversight of travel and training expenses and reimbursement. Audit fieldwork was conducted from October 2023 through November 2023. The audit scope encompassed the travel expense reporting and reimbursement process as of November 28, 2023. The scope of our review of expense reports and their supporting documentation covered the period from October 1, 2022, to September 30, 2023 (i.e., Fiscal Year 2023).

Methodology

To identify whether employees were in compliance with the City's policies and procedures on travel expense reporting and reimbursement, we scrutinized a stratified random sample of 60 travel expense reports from every city department and the highest spenders for Fiscal Year 2023 against the requirements detailed in the travel policy. We compared the policy to current best practices to ensure it was aligned with industry standards for managing employee training and travel expenses (See **Appendix E**).

Out of the total 60 travel expense reports that were reviewed, 45 represented the entire population of departments. The remaining 15 belonged to the highest spenders. We then interviewed selected employees to enhance our understanding and address potential communication gaps. We also examined the expense reports for red flags of fraud, waste, or abuse and conducted follow-ups with employees and supervisors to determine whether inappropriate activity had occurred.

A description of the procedures used to conduct this audit are summarized in **Appendix B**.

| Findings and Analysis

We found that the City's travel expense and reimbursement process benefits from a mix of preventive and detective controls. Pre-approval requirements and well-defined travel policies help to avoid errors or fraudulent activities. Finance's reviews of expense reports are examples of detective controls that identify errors or irregularities after reports have been processed. These measures serve as a safeguard against fraud, waste, or abuse. However, reviewers have faced challenges due to inadequate practices by some employees. Wasteful spending and incomplete expense reports have emerged, highlighting the need to further refine the travel expense reporting process.

City Policy Provides Sufficient Guidance but Employee Awareness is Lacking

The City Policy is a reliable and comprehensive guide for managing travel expenses that aligns with industry best practices (See **Appendix E**). It helps prevent malpractices and ensures responsible use of resources, resulting in improved cost management and streamlined processes. However, a significant challenge is the lack of employee awareness, which could hinder the policy's effectiveness in curbing undesirable practices. We observed that the City policy has strict requirements for the travel expense reporting process and scrutinized reports according to those requirements (See **Appendix C**).

Employees are not providing substantiating documentation. When replicating example procedures and providing substantiating documentation, employees often encounter challenges in the travel expense reporting process. One common shortfall arises when employees neglect to consult the General Services Administration (GSA) schedule for the destination city for projecting meal and lodging costs. Only one expense report in our sample had an event schedule or similar material and the GSA schedule. The GSA schedule provides standardized rates for lodging, meals, and incidental expenses, ensuring the City's travel expenses remain economical.

There is a pattern of incomplete attachment of documentation to the expense reports. Employees often link documentation to individual P-card transactions in MUNIS, with 56% of the sample expense reports having been found to do so. This practice poses a challenge for reviewers at the departmental level and in Finance, hindering a comprehensive assessment of the expenses and potentially impacting an expense report's overall transparency and accuracy. In one instance, an employee was flagged for potential wrongdoing because no airfare receipt was provided, along with the expense report for a flight change, possibly indicating that the employee was involved in an over-purchasing scheme. We later confirmed that no inappropriate activity occurred in this instance after evidence was given that the receipt was accidentally placed with another P-card transaction.

Enhancements can be made in the communication of the policy. Through discussions with employees, it became apparent that although they were aware of the policy's existence, a significant number had not delved into its details. To address this, employees agreed with potential improvements, such as implementing a smart form for expense reports, providing a policy synopsis, creating an interactive video, or attending training sessions facilitated by Finance. Furthermore, employees expressed a desire for specific sections of the expense form to undergo revision, as clarity issues were identified regarding what information to input. One notable example highlighted was the absence of a designated area within the meal calculator to specify the daily meal allowance.

Some departments have a different pre-approval process than others. We found that approximately 18% of the sample expense reports lacked a completed director pre-approval. The majority of these reports were from the Police Department, which follows a different process for obtaining director pre-approval. To address this issue, Finance has made an exception for the Police Department, and they are required to submit their department-specific training form with a director's signature along with the city expense report. However, despite this exception, director pre-approval is not consistently reflected on the expense reports⁴ that are submitted to MUNIS. This inconsistency highlights the challenge of ensuring that city expense reports consistently embody the necessary information to accurately adhere to the city's travel expense policy.

⁴ We observed that unless there is a registration fee, the training request form is not submitted with an expense report. Only four of the ten police department travel expense reports reviewed had the training request form attached to any of the supporting documentation submitted to Finance.

Risks Mitigation Relies on Centralized Controls and Supervisory Review

The Finance department has established a centralized control framework for travel expense reporting based on well-designed policies and procedures, promoting transparency and minimizing errors to ensure timely submissions. While the department conducts reviews of travel documentation to ensure compliance with established guidelines, these reviews are not comprehensive due to time constraints. However, Finance takes corrective actions in cases of policy violations, such as having employees reimburse the City for mischaracterized expenses. These centralized controls are reasonably designed to mitigate risks. Still, they are reliant on effective action at the department level through the key control of supervisory review.

There are inconsistencies in the practice of supervisor review in certain departments. Supervisory review acts as the main control for preventing or detecting employee wrongdoing. As mentioned earlier, employees generally adhere to policies and procedures; however, some departments have deficiencies in their supervisor-review practices, missing instances of non-compliance with policy. This raises the concern that employee travel expenses may not be effectively reviewed. Therefore, there is no guarantee that there has been no wrongdoing. While individual transactions stemming from misuse are immaterial, the continued practice of overriding supervisory controls introduces a cumulative risk. Over time, the cumulative losses from these practices of misuse could lead to material losses for the City. The need for consistent, robust supervisory review is necessary in safeguarding against such risks, especially regarding travel reimbursements. In FY23, of the 254 reimbursements made to employees, 183 were for travel-related expenses such as mileage, lodging, and airfare, totaling \$39,431 (See **Table 2**). Although the current annual amount of travel related reimbursements per year is low, this would not be the case if management decided to move to a per-diem program.

Table 2: Travel Related Reimbursements in FY23

Reason	Total Amount	Percentage	Count ⁵
Mileage Reimbursement	\$21,647	55.5%	145
Lodging	\$7,873	20.2%	16
Airfare	\$3,020	7.7%	7
Transportation	\$2,641	6.8%	21
Food	\$1,621	4.2%	34
Parking	\$1,303	3.3%	24
Registration Fee	\$795	2.0%	2
Miscellaneous Services	\$280	0.7%	5
Gas	\$251	0.6%	5
Grand Total	\$39,431	100.0%	259

Effective supervisory review is critical for preventing the mischaracterization of expenses within reimbursed transactions, and any misuse of taxpayers' dollars, even in a single expense report, can pose a public perception risk. During our review of the expense reports, we identified an instance of possible wrongdoing where an employee had used a D-card to purchase airfare for out-of-state training. Upon returning, the employee requested reimbursement for the airfare, providing the D-card receipt as evidence. Unfortunately, the City reimbursed the employee for an airfare cost that had already been incurred. Our audit team brought this instance to the attention of Finance, which subsequently resulted in the City being reimbursed \$548 for the airfare.

⁵ The City issues non-payroll checks to reimburse employees for all travel expenses incurred via personal funds for a particular trip. Therefore, we broke down the costs on each check, providing a count of each reimbursement category.

The City May Benefit from a Per Diem Policy but Additional Data is Needed

Implementing per diem payments can enhance cost control, preventing excessive spending on accommodations and meals. This approach can reduce administrative costs, streamline the expense approval process, and save time for department employees and Finance staff. Additionally, it may mitigate public perception risks associated with a citizen scrutinizing individual employee expenses. However, relying solely on per diem plans may encourage undesirable employee behavior, such as choosing unsafe locations or making inappropriate spending choices. This could compromise employees' safety or the City's reputation.

Current practices make it difficult to identify if the City would benefit from a meal per diem. The City mandates employees to submit event schedules along with their travel expense reports to ascertain whether conferences or events include pre-paid meals in their registration fees. In cases where meals are provided, employees are expected to receive a reduced daily meal allowance to prevent the City from covering the cost of an unnecessary second meal. We observed that if an employee exceeds the daily meal allotment for a particular day, then Finance will follow up and have them reimburse the City.

The accountable plan aimed at reducing meal costs during official travel is possibly effective, with the average total meal cost being \$163 less than the per diem (See **Table 3**). One limitation of this analysis is that unless an event schedule was available online, it was difficult to accurately determine what meals the employee received through their registration fees. Out of 60 travel expense reports reviewed, only three properly calculated projected meal costs. Employees' non-adherence to this practice makes it difficult for supervisors to accurately assess compliance with the meal policy.

Table 3: Accountable Plan Meal Savings by Department

Department	Number of Trips	Total Savings	Savings Per Trip
Audit	1	\$193	\$193
Capital Improvement Projects	3	\$325	\$108
City Manager's Office	2	\$486	\$243
Community Services	1	\$29	\$29
City Secretary's Office	2	\$134	\$67
Economic Development/Tourism	6	\$1,361	\$227
Electric	3	\$328	\$109
Fire Department	3	\$415	\$138
Fiscal Services	1	\$20	\$20
Fleet	1	\$111	\$111
Human Resources	1	\$58	\$58
Information Technology	1	\$127	\$127
Municipal Court	2	\$332	\$166
Police Department	10	\$1,605	\$160
Planning & Development	1	\$58	\$58
Parks & Recreation	3	\$1,350	\$450
Public Works	2	\$381	\$190
Water Services	2	\$35	\$18
Total	45	\$7,348	\$163

Most employees book hotels that are more expensive than the GSA lodging rate. While some employees saved the city around \$3,544 by choosing accommodations with rates at or below the GSA rate, others cost the city \$8,841 by opting for higher daily rates (See **Table 4**). About 29 employees out of 44 booked hotels with rates above the GSA rate. This pattern could be happening because the GSA rates are historically lower than the hotel rates for the destination city, and many employees stay at the conference hotel for convenience, which is allowed by city policy. The federal government has been raising the lodging per diem rates for the previous two fiscal years to address this issue of inadequate lodging cost coverage.

The City uses the meal per diem to determine meal expense reasonability; therefore, it could use the GSA lodging rate to determine lodging reasonability. However, criteria for an acceptable deviation range may need to be established to do so effectively. Sample data showed lodging rates were 44% above the GSA rate on average. Of 29 employees who surpassed the GSA rate, only 9 exceeded the standard by less than 25%, 11 had rates between 25% and 50%, and 9 exceeded the rate by 50% or more.

Table 4: Expense Reports Compared to Lodging GSA Per Diems

GSA Lodging Rate	Expense Reports ⁶	Average Difference	Average Savings (Losses)	Total Savings (Losses)	Below 50%
Above	29	(\$56)	(\$313)	(\$8,841)	20
Below	15	\$30	\$221	\$3,544	-
Total	44	(\$24)	(\$119)	(\$5,297)	-

Employee Travel Practices May Need Additional Scrutiny

While the City's internal controls are effective at mitigating the risk of material fraud occurring in the travel expense reporting process, there are particular travel practices by employees that have gone undocumented. Each of these practices introduces a set of risks, increasing the potential for instances of fraud, waste, or abuse.

Some employees are initiating professional development. According to City policy, department directors are responsible for managing their employees' training expenses. However, two distinct approaches are prevalent in the professional development initiatives within the City. One notable approach involves directors prioritizing departmental needs in alignment with employee development. This was exemplified by the CIP department, which assumed new facility responsibilities and subsequently provided training to employees for the effective execution of these tasks.

Alternatively, employees may initiate training opportunities and present them to department directors. Department directors who overly rely on this bottom-up approach may increase the risk of waste or abuse – as there is an incentive for some employees to prioritize the destination over professional development or other organizational objectives. We found that an employee may be prioritizing the destination over training when they initiate the travel, and a combination of the following indicators are present: (1) out-of-state leisure destinations, (2) extending their stay beyond the conference dates, (3) evidence of missing conference sessions, (4) traveling with non-employees, and (5) training loosely or not related to the employee's position.

Spouses or non-employees accompanying employees may cost the City more. The current city policy permits employees to bring their spouses or other non-employees on official trips, provided that the employees cover all associated expenses. While this policy appears to be followed by the majority of employees, our audit has identified instances where it has been subject to abuse. Notably, we observed some meal expenses that appeared to be allocated for spouses and a few visits to pricier establishments than employees would typically patronize if traveling alone. Similarly, discrepancies were noted in lodging expenses, where some employees opted for more upscale accommodations when accompanied by their spouses or non-employees.

⁶ One expense report did not have any lodging costs incurred and therefore was excluded from this analysis.

Not taking appropriate vacation time for extended stays. Employees are permitted to extend their stays at a destination for personal vacation purposes, provided they take appropriate vacation time and bear the costs associated with the additional stay. However, we identified an instance where an employee extended their stay without requesting vacation time and claimed to be working remotely despite the City's prohibition of remote work. This resulted in the City incurring unnecessary expenses.

Vacations or personal trips combined with City business travel require special authorization from the Department Manager or Director. Expenses for such trips are not reimbursable. However, instances have been identified where the director approving travel and the supervisor approving vacation time are separate, making it difficult for one individual to determine the length of absence. In the federal government, factors that directors must consider when authorizing travel include the employee's travel plans, including plans to take vacation leave in conjunction with travel.⁷ Currently, the expense report does not offer reviewers the ability to identify when the date of absence exceeds the length of the conference, possibly allowing employees to hide extended stays from directors.

Inadequate travel planning may result in the misapplication of airfare e-credits to an employee's personal account. Over-purchasing airline tickets is a form of maleficence where the employee buys more tickets than needed or pricier tickets and then profits from the price difference. We found that employees sometimes cancel flights and receive e-credits, which could be misused for inappropriate activities. The City does not have any mechanisms to ensure appropriate use of e-credits, posing a potential risk of fraud.

There is variance in cost-conscious travel training amongst employees. Some employees have demonstrated cost-consciousness by choosing economical travel and training options, resulting in significant savings for the City. Eight employees recently shared lodging and meals during a training event that costed \$4,449 in total, spending only \$556 per employee. This amount is significantly lower than the average \$981 typically spent on employee travel and training.

However, our audit has also revealed that not all employees plan to travel and train as cost-efficiently as the abovementioned example. Out-of-state travel poses a higher risk of incurring wasteful expenses than in-state travel. From our sample, the city's most expensive travel and training trip cost \$13,092, where five employees were sent out of the state for four training days, resulting in a cost of \$2,618 per employee. This amount is more than three and a half times more expensive than the cost of the in-state training mentioned above. During this trip, we observed that the employees exceeded the daily meal allotment on select days and had mischaracterized expenses.

Highest spending employees are candidates for additional scrutiny. Upon closer examination, it became apparent that the highest spenders deviated from the established policies and procedures, surpassing the exceptions observed in the sample population. For instance, the highest spender had more significant exceptions on 35% of the policy requirements than the sample population. In comparison, the costliest trip had more exceptions, at 42% (See **Appendix D**). Noteworthy was that both groups had more meals that went over the daily allotment and mischaracterized expenses, and therefore, they would need to reimburse the City. As a result, Finance may wish to target its efforts toward scrutinizing these higher-risk expense reports.

⁷ 41 CFR 301-71.107

Appendix A: Management Response

The following summarizes the recommendations issued throughout this report. The auditors found that staff and the Department were receptive and willing to make improvements to controls where needed. Management has provided their response to each recommendation.

Management Response Summary			
Risk: Medium	1.	The City's travel expense policy is comprehensive to ensure that it contains all the necessary information to be effective. However, due to its length, many employees do not comprehend all of the requirements. To address this issue, management should work with Public Communications to explore new ways to communicate the policy more effectively to employees. Possible options could include: (1) a condensed policy summary, (2) an interactive document guide, (3) a training video, (4) a process document detailing all steps an employee should take from pre-approval to submission, (5) a frequently asked questions sheet or (6) an electronic smart form.	Expected Completion: 2024
		Plan of Action: Management concurs with the recommendation and will implement training videos to be included on CityHub to enhance communication as well as a condensed policy. A best practices document and examples of a pre and post travel completed packet have been created and are on CityHub currently. Other communication methods will be considered as resources allow.	Responsibility: Fiscal Services/CMO
Risk: Medium	2.	Management should consider reworking the travel expense report to enhance the review process. For instance, a projected daily meal allotment could be added, along with a field to indicate if the employee intends to utilize vacation time to prolong their stay. Additionally, a section could be included to specify the GSA lodging rate, allowing reviewers to assess the reasonableness of the expense. Lastly, a differentiation could be made between the length of absence and the length of the event.	Expected Completion: 2024
		Plan of Action: Management concurs with the recommendation and plans to improve the review process where the same individual is not only pre-approving the travel, but also reviewing the expenses submitted after the event. Approval workflows will be moved to the immediate supervisor for the traveling employee.	Responsibility: Fiscal Services/CMO
Risk: Low	3.	Without employees submitting the appropriate substantiating documentation, the audit team cannot accurately assess whether the City should adopt a per diem plan. Following a future consistent submission of substantiating documentation, Finance should analyze meal expenses to be provided to the CMO. In so doing, an informed decision can be made whether to transition to a per diem plan or retain the existing accountable plan.	Expected Completion: 2024
		Plan of Action: Finance and IT will investigate what processes would need to occur to obtain this data from existing databases and make a recommendation to the City Manager regarding data gathering at a future date.	Responsibility: Fiscal Services/CMO
Risk: High	4.	Management should develop criteria to identify high-risk expense reports that need focused scrutiny, as well as training and processes necessary for staff or supervisors to adequately review them. The criteria could include but are not limited to (1) The travel is out-of-state, (2) a spouse or non-employee is traveling with the employee, (3) the date of absence exceeds the appropriate travel time for the conference/event, (4) the employee is among the highest spenders or the total cost of a trip exceeds a set amount, (5) evidence of missing conference sessions and/or, (6) training is loosely related to the employees' job responsibilities.	Expected Completion: 2024
		Plan of Action: Management concurs with the recommendation and will update the travel policy to define high risk travel and the workflow process for those types of expenses.	Responsibility: Fiscal Services/CMO

Risk: Medium	5. While the City currently prohibits remote work, there is no written policy. This could lead employees to exploit this ambiguity for their benefit. The CMO should develop a policy giving clear directives about the expectations of remote work.	Expected Completion: Spring 2024
	Plan of Action: Remote work is not allowed unless approved by the City Manager's Office on a case-by-case basis. Management can reiterate this to all staff.	Responsibility: CMO
Risk: Medium	6. The CMO should set clear guidelines for department directors to establish a baseline for professional development, ensuring alignment with department needs and employee development plans. Additionally, clear expectations should be communicated, emphasizing that employees should not travel for training outside their job responsibilities.	Expected Completion: Spring 2024
	Plan of Action: Management agrees there should be overall consistency in the selection of professional development. However, department leaders are given the responsibility for ensuring training plans suit the particular needs of the individual departments.	Responsibility: CMO
Risk: Low	7. Travel cards, the MUNIS expense claim application, and continuous monitoring software offer opportunities to make Finance's management of the travel expense reporting process more efficient and impactful. Finance should research possible technology solutions to assist in monitoring travel expenses.	Expected Completion: 2024
	Plan of Action: City Management will review what additional technology solutions may be available to make monitoring these types of expenses more efficient. The implementation costs and constraints on resource availability will need to be evaluated to determine if they outweigh possible benefits to the city.	Responsibility: CMO/Fiscal Services

Appendix B: Methodology

The Internal Auditor's Office evaluated the travel expense reporting and reimbursement process by analyzing three main components: (1) risks from previous audits, (2) compliance with City's policies and procedures, and (3) fraud prevention. The following summarizes the subobjectives of the audit under each of these categories and the methodology used to obtain sufficient evidence to answer each subobjective question.

Risks from Previous Audits

1. How have the City's departments' travel budgets and employee reimbursements changed since previous audits?

- Obtained data on departmental travel and external training accounts from FY13 to FY23. Following this, a thorough analysis of budget and expenditure data was performed to identify trends and patterns, including a comparison between budgeted and actual figures, expenditures per Full-Time Equivalent (FTE), and inter-departmental comparisons.
- Obtained all travel related request for checks for FY23. Identified employees with reimbursements exceeding more than \$1,000 or accounted for more than 5% of total reimbursements in FY23 and reviewed their request for checks for evidence of potential wrongdoing. Categorized reimbursements by their expense (i.e., lodging, airfare, food, etc.) and analyzed what purchases could have been made on a city P-card in lieu of a personal card.

2. Has there been action to address the risks identified in pervious audit recommendations? What are new risk areas?

- Reviewed the City's travel policies and procedures. Analyze whether the updated travel policies and procedures and travel documentation addressed the previously identified risks.
- Researched best practices for local government travel expense programs and compared them to College Station's current practices.
- Reviewed the MUNIS vendor list to determine if employees are properly distinguished from Vendors and if inactive accounts are still present in the system.

Compliance with Policies and Procedures

1. Are departments/employees properly following the deadlines, documentation, meal, lodging, and approval requirements?

- Obtained a stratified random sample of 45 travel expense reports from every city department (See **Table 5**) and 15 from the highest spending employees in Fiscal Year 2023. In an instance where multiple expense reports were submitted for a trip, they were treated as one singular report.

Table 5: Departmental Breakdown of the 45 Sampled Travel Expense Reports

Department	Number of Trips	Department	Number of Trips
Audit	1	Fleet	1
Capital Improvement Projects	3	Human Resources	1
City Manager's Office	2	Information Technology	1
Community Services	1	Municipal Court	2
City Secretary's Office	2	Police Department	10
Economic Development/Tourism	6	Planning & Development	1
Electric	3	Parks & Recreation	3
Fire Department	3	Public Works	2
Fiscal Services	1	Water Services	2

- Reviewed the City's official policy requirements for purchasing staff meals, lodging, transportation, documentation, approval, and reasonability.
 - Created a checklist detailing all compliance requirements to comply with policies and procedures and compared them to the travel expense report obtained in the sample (See **Appendix C**).
 - Assessed if there were any particular trends amongst employees or departments with failure to comply with policies and procedures.
 - Calculated what the projected meal cost would be for a trip based on the General Services Administration (GSA) schedule for the destination city and city policy on pre-paid conference meals and compared this to the projected costs and expenses submitted by the employee.
 - We conducted interviews with 12 employees, encompassing all departments except two. The selection criteria for these employees were based on identified risks from the expense report reviews. Our goal was to uncover common issues in the preparation of travel expense reports and to identify ways to improve the communication of policy guidelines to staff by streamlining processes.
- 2. Is the City benefitting from using an accountable plan over a per diem plan?**
- Researched best practices related to per diem plans for meal and lodging travel expenses.
 - Calculated the difference between the actual lodging rate and the established GSA Rate for the destination city to determine if there is unrealized savings.
 - Analyzed the meal expenses of employees to identify how spending habits would change with a per diem plan.
 - Interviewed city employees to gather their feedback about what their perceptions are of the City utilizing a per diem plan versus an accountable one.

Fraud Prevention

- 1. Are internal controls adequate to mitigate the risk of expense reimbursement fraud?**
- Interviewed Fiscal Services personnel to gain an understanding of the detective controls they have developed to review expense reports for fraud, waste, or abuse. Obtained supporting documentation for evidence employees are reimbursing the city for wasteful or unapproved spending.
 - Reviewed the internal control documentation related to accounts payable to gain an understanding of the preventive controls designed to prevent fraudulent activities.
- 2. Is there any evidence of expense reimbursement fraud schemes or mischaracterized expenses?**
- Examined 60 travel expense reports, scrutinizing P-card transactions and reimbursements to identify any instances of mischaracterized transactions.
 - Analyzed 60 travel expense reports by reviewing itemized receipts to detect any indications of altered or fictitious documentation.
 - Reconciled all reimbursement claims made by employees from a sample of 60 travel expense reports with P-card and D-card transactions to determine if multiple reimbursement claims had occurred. Identified all reimbursements for FY23 that had matching totals and reviewed if employees had been reimbursed more than once for an expense.
 - Identified personnel whose expense reports exhibited indicators suggestive of potentially fraudulent activities. Subsequently, conducted interviews with these employees to elicit their accounts regarding the purpose of their trips and associated expenses. Additionally, gathered supplementary supporting documentation and contacted conferences to further substantiate the testimony from employees.
- 3. Are the highest spenders effective in preventing fraud, waste, and abuse?**
- Obtained all of highest spenders' expense reports for FY23 along with the reports of all other City employees who attended the event. Examined all support and reimbursement documentation provided in these expense reports.
 - Researched each event attended and obtained event schedules and document the purpose and benefits of the event.
 - Reviewed the expense reports against the city policy requirements (See **Appendix D**) and documented deviations from city practices. Compared the results against the sample population.
 - Reviewed payroll records related to the corresponding date of absence for travel to identify instances where there was a lack of vacation leave.
 - Interviewed the highest spending employees to get their justification for the business expenses and obtained any additional supporting documentation not provided with the expense reports.

Appendix C: Policy Requirements

The employee did not do the following:	Audit	CP	City Manager	City Council	City Secretary	Economic Dev	Electric Utility	Fire Dept	Finance	Facilities	Human Res.	Info. Tech.	Municipal Ct	Police Dept.	Planning & Dev.	Parks & Rec.	Public Works	Water Utility	Grand Total	Exception %
Complete all required fields on expense form	-	1	-	-	-	1	-	-	-	-	-	-	-	8	-	1	-	-	11	24%
Complete the projected and actual costs fields	-	-	-	-	-	-	-	3	-	-	-	-	1	8	-	2	-	1	15	33%
Fill out everything correctly on expense form	-	1	-	-	-	-	2	1	-	-	-	-	1	3	-	-	-	-	8	18%
Upload all documentation to Munis as one document	-	-	2	1	1	-	-	3	1	-	-	-	2	10	-	3	1	1	25	56%
Replication of Illustrated Procedures - Total Exceptions:	-	2	2	1	1	1	2	7	1	-	-	-	4	29	-	6	1	2	59	33%
Affix receipts together to paper with like items	-	-	2	1	1	1	1	3	-	-	-	-	2	9	-	3	-	1	24	53%
List all employees on receipt if expenses are for multiple people	-	-	-	-	-	2	-	-	-	-	-	-	-	1	-	2	-	-	5	11%
Provide a missing receipt form when receipt was lost	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	1	2%
Provide adequate documentation to determine max allowance	1	3	2	1	2	6	2	3	1	1	1	1	2	10	1	3	2	2	44	98%
Provide itemized receipts for all expenses	-	-	-	-	-	-	-	-	-	-	-	-	-	2	-	-	-	1	3	7%
Provide receipts with clearly identifiable information	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	1	-	-	2	4%
Scan and submit receipts in electronic form	-	1	-	-	-	1	-	1	-	-	-	1	-	1	-	1	-	-	6	13%
Sign legibly the receipts of D-card expenses authorized	-	-	1	1	-	5	1	-	1	-	-	1	2	2	1	-	-	-	15	33%
Appropriate Documentation - Total Exceptions:	1	4	5	3	3	16	4	7	2	1	1	3	6	26	2	10	2	4	100	28%
Submit expense reimbursement within 30 days	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2%
Submit itemized receipts within 5 business days	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	2	4%
Timely Submission - Total Exceptions:	-	1	-	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	3	3%
Only make purchases with a clear business connection	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	1	-	2	4%
Submit travel expenses comparable to those of other employees	-	-	-	-	-	1	-	1	-	-	-	-	-	-	-	-	-	-	2	4%
Travel for a purpose related to the employee's job duties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0%
Reasonability - Total Exceptions:	-	-	-	-	-	2	-	1	-	-	-	-	-	-	-	-	1	-	4	3%
Obtain department head approval prior to travel date	-	-	-	-	-	-	-	-	-	-	-	-	-	6	-	-	-	1	8	18%
Obtain supervisor approval within 5 business days of return	-	1	1	-	-	-	-	-	-	-	-	-	-	1	-	1	-	-	5	11%
Approval - Total Exceptions:	-	1	1	-	-	-	-	-	-	1	-	-	-	7	-	1	-	1	12	13%
Denoted whether a personal or city vehicle was used	-	-	-	1	-	-	-	-	-	-	-	-	-	1	-	-	-	-	2	4%
Purchase basic economy airfare	-	-	-	-	-	1	-	-	-	-	-	1	-	-	-	-	-	-	2	4%
Reduce cost by traveling together with other employees	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2%
Submit adequate documentation for mileage reimbursement	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	1	2%
Transportation - Total Exceptions:	-	1	-	1	-	1	-	-	1	-	-	1	-	1	-	-	-	-	6	3%
Avoid higher lodging cost resulting from traveling with guest	-	-	-	-	-	-	-	1	-	-	-	1	-	-	-	-	1	-	3	7%
Avoid lodging at a luxury hotel	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	1	-	2	4%
Avoid using valet parking	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0%
Lodging - Total Exceptions:	-	-	-	-	-	1	-	1	-	-	-	1	-	-	-	-	2	-	5	4%
Avoid purchasing alcohol	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0%
Follow procedures for business meal (i.e., for city guests)	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	-	-	1	2%
Keep all tips below 20% of purchase amount	-	-	-	-	-	-	1	-	-	-	-	-	-	-	-	-	-	-	1	2%
Keep meals expenses below the daily allotted amount	-	-	-	-	1	-	-	1	-	-	-	-	-	-	-	-	-	-	2	4%
Meal - Total Exceptions:	-	-	-	-	2	-	1	1	-	-	-	-	-	-	-	-	-	-	4	2%
No evidence of potentially altered or fictitious receipts	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	0%
No evidence of potentially mischaracterized expenses	-	-	-	-	-	2	-	-	-	-	-	1	-	-	-	-	-	-	3	7%
Potential Wrongdoing:	-	-	-	-	-	2	-	-	-	-	-	1	-	-	-	-	-	-	3	3%
Grand Total:	1	9	8	5	6	23	7	17	4	2	1	6	10	64	2	18	6	7	196	14%
Exception Percentage	3%	9%	13%	16%	9%	12%	7%	18%	13%	6%	3%	19%	16%	20%	6%	19%	9%	11%	14%	

Appendix D: Highest Spenders Comparison to Sample

The employee did not do the following:	Sample	Highest Spender	Difference from Sample	Above the Sample Exception Rate?	Most Expensive Trip	Difference from Sample	Above the Sample Exception Rate?
Complete all required fields on expense form	24%	-	-24%	-	20%	-4%	-
Complete the projected and actual costs fields	33%	-	-33%	-	20%	-13%	-
Fill out everything correctly on expense form	18%	18%	-	Yes	100%	82%	Yes
Upload all documentation to Munis in one document	56%	9%	-46%	-	80%	24%	Yes
Replication of Illustrated Procedures - Total Exceptions:	33%	7%	-26%	-	55%	22%	Yes
Affix receipts together to paper with like items	53%	9%	-44%	-	100%	47%	Yes
List all employees on receipt if expenses are for multiple people	11%	9%	-2%	-	0%	-11%	-
Provide a missing receipt form when receipt was lost	2%	-	-2%	-	0%	-2%	-
Provide adequate documentation to determine max allowance	98%	100%	2%	Yes	100%	2%	Yes
Provide itemized receipts for all expenses	7%	18%	12%	Yes	80%	73%	Yes
Provide receipts with clearly identifiable information	4%	-	-4%	-	20%	16%	Yes
Scan and submit receipts in electronic form	13%	-	-13%	-	80%	67%	Yes
Sign legibly the receipts of expenses the employee authorized	33%	18%	-15%	-	0%	-33%	-
Appropriate Documentation - Total Exceptions:	28%	19%	-8%	-	45%	17%	Yes
Submit expense reimbursement within 30 days	2%	-	-2%	-	0%	-2%	-
Submit itemized receipts within 5 business days	4%	-	-4%	-	0%	-4%	-
Timely Submission - Total Exceptions:	3%	-	-3%	-	0%	-3%	-
Only make purchases with a clear business connection	4%	9%	5%	Yes	40%	36%	Yes
Submit travel expenses comparable to those of other employees	4%	45%	41%	Yes	80%	76%	Yes
Travel for a purpose related to the employee's job duties	0%	9%	9%	Yes	20%	20%	Yes
Reasonability - Total Exceptions:	3%	21%	18%	Yes	47%	44%	Yes
Obtain department head approval prior to travel date	18%	9%	-9%	-	-	-18%	-
Obtain supervisor approval within 5 business days of return	11%	9%	-2%	-	-	-11%	-
Approval - Total Exceptions:	13%	9%	-4%	-	-	-13%	-
Denoted whether a personal or city vehicle was used	4%	-	-4%	-	-	-4%	-
Purchase basic economy airfare	4%	9%	5%	Yes	-	-4%	-
Reduce cost by traveling together with other employees	2%	9%	7%	Yes	100%	98%	Yes
Submit adequate documentation for mileage reimbursement	2%	-	-2%	-	-	-2%	-
Transportation - Total Exceptions:	3%	5%	1%	Yes	25%	22%	Yes
Avoid higher lodging cost resulting from traveling with guest	7%	-	-7%	-	-	-7%	-
Avoid lodging at a luxury hotel	4%	-	-4%	-	-	-4%	-
Avoid using valet parking	0%	-	-	-	-	-	-
Lodging - Total Exceptions:	4%	0%	-4%	-	-	-4%	-
Avoid purchasing alcohol	0%	-	-	-	-	0%	-
Follow procedures for business meal (i.e., for city guests)	2%	9%	7%	Yes	-	-2%	-
Keep all tips below 20% of purchase amount	2%	-	-2%	-	-	-2%	-
Keep meals expenses below the daily allotted amount	4%	18%	14%	Yes	80%	76%	Yes
Meal - Total Exceptions	2%	7%	5%	Yes	20%	18%	Yes
No evidence of potentially altered or fictitious receipts	0%	-	-	-	-	-	-
No evidence of potentially mischaracterized expenses	7%	9%	2%	Yes	40%	33%	Yes
Potential Wrongdoing:	3%	5%	1%	Yes	20%	17%	Yes
Grand Total	14%	10%	-4%	35%	29%	16%	42%

Appendix E: Travel Expenses Best Practices

Best Practice Principle		Yes	No	Auditor Comment
1.	Regularly review and update travel policy to ensure it provides clear guidance.		X	Finance reviews and updates the travel policies and procedures on a periodic basis in order to address new needs or implement more robust controls
2.	Encourage economical travel and consider prohibiting the use of plane Wi-Fi.	X		
3.	Use per diems for lodging and meals.		X	Best practices recommend using per diems for lodging and meals since they can be an effective cost control for hotels, and eliminates issues such as lost receipts, the administrative burden associated with recordkeeping and review, excessive tipping, and potential for unreasonable meal costs.
4.	Create separate guidelines for non-travel meals.	X		
5.	Provide training on policy requirements.		X	It is the responsibility of the Supervisor or Manager to ensure that employees have a clear understanding of the City's travel policy before embarking on any travel and to verify compliance with the policy when approving the expense report upon an employee's return.
6.	Consider centralized control or oversight options.	X		
7.	Assign a dedicated FTE to guide travel plans and costs.		X	The City does not employ an FTE dedicated to managing a travel program.
8.	Check travel expense claims in detail, often alongside the employee's supervisor.	X		
9.	Centralize procurement for airline travel.		X	Currently, centralizing procurement for airline travel is not implemented. Instead, employees are required to purchase air travel through a city card or request a reimbursement
10.	Use a centralized program to track travel.		X	Travel documentation is upload to MUNIS but inconsistencies with recordkeeping make it difficult to track active travel or review historical travel
11.	Establish a process for addressing non-compliance.	X		
12.	Reject claims for reimbursement that lack adequate support or documentation.	X		
13.	Forbid employees who do not clear travel advances to take additional advances.	X		
14.	Make sure approvers have dedicated time for review.		X	As the application of Travel and Expense policies is decentralized, approvers are required to review their employees' travel expenses at their own discretion, while ensuring that all necessary documents are submitted within the stipulated five-day time frame.
15.	Pre-approve travel, including a cost estimate.	X		
16.	Pre-approve policy exceptions.	X		
17.	Minimize travel advances outstanding.	X		
18.	Keep track of travel advances.	X		
19.	Resolve travel advances with employees leaving the agency before they separate.		X	City policy does not specify if travel advances with employees must be resolved before termination.
20.	Require timely submission of receipts.	X		
21.	Use standardized forms, including a comprehensive travel reimbursement form.	X		
22.	Document shared costs in claims for reimbursement	X		
23.	Document reasons when actual costs exceed the pre-approved travel estimate.		X	Unless questioned by their supervisor, employees are not required to document why actuals exceed any projected costs.
24.	Review event agendas or travel itineraries with travel claims.	X		
25.	Require proof of travel with travel claims.	X		
26.	Require approval by the direct supervisor.	X		
27.	Enforce the travel policy.	X		

The Office of City Internal Auditor was established in accordance with the City of College Station Charter as an independent office reporting to City Council to help establish accountability and improve City services. The Office of City Internal Auditor is responsible for conducting performance audits of Departments, offices, boards, activities, and agencies of the City and providing recommendations for improvement.

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