



L.A. CERA

STAFF TRAVEL POLICY

**Administrative Policy
Adopted April 17, 2025**

Staff Travel Policy

Authorizing Manager: Chief Financial Officer

Original Issue Date: April 17, 2025

Effective Date: May 1, 2025

Mandatory Review: April 17, 2028 (Three years after the adoption date)

Approval Level: Chief Executive Officer

I. Purpose

This Policy sets forth the requirements for the approval and reimbursement of authorized travel expenses incurred by LACERA Staff. Travel for educational and administrative purposes is necessary for Staff development and to fulfill LACERA's Mission to produce, protect, and provide the promised benefits to our members. Consistent with LACERA's constitutional duty to defray reasonable expenses of administering the system, travel expenses must be necessary and reasonable for the administration of the retirement system to fulfill LACERA's Mission, Vision, and Values. Travelers are expected to minimize travel costs but are not expected to be unreasonably inconvenienced in reducing costs. To that end, Travelers shall act as fiduciaries by exercising sound judgment and operating with a sense of public service when making travel arrangements.

Staff must avoid even the appearance of impropriety in connection with their education and travel. Acceptance of gifts of travel, such as transportation, meals, and lodging by a public agency, though permitted under certain circumstances by applicable law, can create the appearance that LACERA encourages "pay to play" and may, unwittingly, create opportunities for undue influence on Staff. This policy, therefore, does not permit LACERA, as an agency, and its Staff to accept gifts of travel. Travel shall not take place, nor shall Staff be reimbursed for travel or for portions of travel that does not provide a benefit to LACERA.

II. Sustainability

Staff are encouraged to consider sustainability in making travel choices, including whether and how to travel, the viability and efficacy of alternative forms of participation (such as geographically closer events or virtual meetings), the impact of airline business class vs. coach, the number of trips taken, the number of Staff participating in a single event, avoidance of car transportation when possible, and the carbon footprint of travel and lodging options through available online tools and inclusion of estimates in requests.

III. Scope

This Policy applies to LACERA Staff attending or traveling to Administrative Meetings and Educational Trainings (as defined in Section V). Due to operational requirements, the Investment Division will adhere to, maintain, and monitor its own separate division specific travel policy. Board trustees do not fall within the scope of this Policy and are governed by their own separate policy.

IV. Legal Authority

This Policy is adopted pursuant to the Board of Retirement's plenary authority and exclusive fiduciary responsibility for administration of the system (Cal. Const., art. XVI sec. 17). The Chief Executive Officer is appointed by the Board of Retirement and Board of Investments to oversee and manage LACERA staff, including approval of necessary administrative policies.

V. Definitions

For the purposes of this Policy, the terms below have the following definitions:

Administrative Meeting: A meeting in furtherance of LACERA's interests, including legislative advocacy, speaking engagements, business-related information exchange between trustees, Staff, consultants, and vendors, participation in pension and investment-related organizations, and similar events. For purposes of this Policy, Board offsite meetings are considered Administrative Meetings, and regular onsite Board meetings are not.

Business Meal: Meals with an actual itemized cost, as opposed to applying the Per Diem Rate, directly related to the conduct of business, where the primary purpose of the meal should be business-related such as meetings with staff, executives, trustees, service providers, or vendors, for discussions related to business operations.

Educational Training: Conferences, seminars, and meetings for education or training purposes.

Event: An in-person Administrative Meeting or in-person Educational Training.

Host: The organizer of an Event.

Per Diem Rate: Rate set each fiscal year by the independent agency of the United States, General Services Administration (GSA), as an allowance for lodging, meals, and incidental expenses that federal agencies use to reimburse their employees for subsistence expenses incurred during official travel. These rates apply within the continental U.S. (CONUS) and in non-foreign areas outside of CONUS (which includes Alaska, Hawaii, and U.S. territories and possessions). For international (foreign) locations, the U.S. Department of State is responsible for the country's foreign policy and relations for all international locations.

- GSA: <https://www.gsa.gov/travel/plan-book/per-diem-rates>
- U.S. Department of State: aoprals.state.gov/web920/per_diem.asp?PrintView=1

Staff: Permanent full-time and part-time employees, interns, temporary agency contractors, County temporary contractors, and rehired retirees of LACERA.

Traveler(s): LACERA Staff attending an in-person event.

VI. Policy

1. LACERA Pays Its Own Way

Staff must avoid even the appearance of impropriety in connection with education and travel. Acceptance of gifts of travel, such as transportation, meals, and lodging, by a public agency, though permitted under certain circumstances by applicable law, can create the appearance that LACERA encourages “pay to play” and may, unwittingly, create opportunities for undue influence on Staff. This policy, therefore, does not permit LACERA, as an agency, or its Staff to accept gifts of travel. LACERA pays for the authorized expenses of travel pre-approved pursuant to this Policy.

Please note that in very limited circumstances, and where specific regulatory requirements are met and pre-approved in consultation with the Legal Division, LACERA may allow third parties to pay for Staff travel. Such travel is not considered a gift or income to the Traveler, but a payment to the agency. See Section 2.1.1. Travel Subject to Reporting on FPPC Form 801 below.

2. Travel Authorization

Division Managers, or their designees, must pre-authorize travel by staff members of their division for which reimbursement under this Policy will be sought. Executive Officers, or their designees, must pre-authorize travel for Division Managers. Policy standards governing travel authorization and approval of travel by Investment Division Staff is delegated to the Chief Investment Officer (CIO), or designee, and contained in an Investment Division specific travel policy. Staff may not agree or commit to attend, speak, or otherwise participate at an event requiring travel for which reimbursement will be sought until they have obtained the appropriate approval as outlined above.

2.1. Spend Request Forms

Requests for travel authorization shall include estimated costs and be submitted in *Emburse Professional as a Spend Request*.

2.1.1. Travel Subject to Reporting on FPPC Form 801

In addition to approval required under Section 2, where travel expenses are to be paid or reimbursed by a third-party, Staff shall submit required documentation for review and approval by the Legal Office to determine compliance *before* undertaking travel to ensure expenses meet all regulatory requirements and conform to reporting requirements on the California Fair Political Practices Commission’s Form (FPPC) 801 (Payments to Agency Report). Staff shall complete a Form 801 and provide receipts and other necessary information to the Legal Office *after* travel to ensure compliance with FPPC requirements.

2.2. Exceptions

Requests for exceptions to this Policy must be provided in the *Spend Request* by the

Traveler before travel (if the exception is foreseeable) or with the *Pardon/Approval Request Form* submitted with the *Expense Report* after travel is completed. It is the responsibility of the Traveler to submit all documentation required by this Policy. Exceptions are subject to the approval of the CEO, or designee, based on good cause shown by the Traveler.

2.2.1. Expense Report

When requesting approval for reimbursement of expenses that exceed the amounts estimated in the *Spend Request*, Staff shall include a written explanation of why the amounts were exceeded.

2.3. Cancellation of Travel Arrangements

Travelers are responsible for timely canceling travel arrangements made on their behalf so that no costs will be incurred by LACERA. Travelers are responsible for reimbursing all costs LACERA incurs as a result of their failure to cancel travel arrangements in a timely manner, including but not limited to registration fees. If the Traveler believes the failure to cancel was due to facts or circumstances beyond their control and is requesting a pardon for incurring the cancellation expense, they must submit a *Pardon/Approval Request Form* to their Division Manager and/or the CEO or designee for approval.

Travelers will manage and inform travel@lacera.com regarding travel-related credits issued for airfare, hotels, and registration. The Disbursements Unit will track and record travel credits and include them in travel reporting. Travelers are responsible for applying travel credits to future travel.

2.4. CEO's Travel Itinerary

The CEO's travel itinerary shall be reviewed by the Deputy Chief Executive Officer or Chief Counsel to ensure consistency with this Policy.

3. Travel Expenses

3.1. Corporate Credit Card

Travel expenses shall be charged on the Corporate Credit Card for the pre-travel expenses directly related to the business needs for travel. Staff without a Corporate Credit Card shall have travel arrangements and pre-travel expenses charged on their Division Manager's Corporate Credit Card.

3.2. Expense Reimbursement

Staff, at the discretion of management, may use their personal credit card for expenses incurred during their trip and may request reimbursement of expenses permitted under this Policy.

Reimbursement of travel expenses (*Expense Report*) shall be submitted in *Emburse Professional* no later than 30 days following the last date of travel. If the Staff member believes the deadline was exceeded due to facts or circumstances beyond their control and is requesting a time extension, Staff must submit a written explanation in the *Pardon/Approval Request Form* to the CEO, or designee, stating why the reimbursement was not requested in a timely manner and requesting for approval. In limited situations, the CEO, or designee, may approve reimbursement requests submitted after the deadline.

4. Air Travel

4.1. Airport Selection

Travelers may elect to fly from the most convenient airport.

4.2. Travel Class

Air travel shall be in Coach/Economy/Main class in North America. International travel outside of Canada or Mexico can be in Business Class. Economy upgrades that provide extra legroom and are below Business Class and First Class, such as Preferred or Main Cabin Extra (American Airlines), Economy Plus (United Airlines), or Comfort+ (Delta), are permitted. For Southwest Airlines, the Traveler may upgrade to Business Select, which does not provide extra legroom but guarantees boarding in positions A1-A15 and ensures that the Traveler can avoid checking their carry-on luggage.

4.3. Airfare

4.3.1. Domestic Airfare Cost

Travelers are permitted to book flights in any of the following classes for domestic travel, including Canada and Mexico: Coach, Economy, or Main Cabin, provided that the total flight cost does not exceed \$800, including applicable fees and charges (priority boarding, seat selection, leg room). If the cost of the flight exceeds \$800, written pre-approval must be obtained from the CEO, or designee, before the ticket is purchased. (See below for Checked Baggage fees.)

4.3.2. International Airfare Cost

Travelers are permitted to book flights in Business Class for international locations as long as the total flight cost does not exceed \$3,000, including applicable fees and charges (priority boarding, seat selection, leg room). If the cost of the flight exceeds \$3,000, written pre-approval must be obtained from the CEO, or designee, before the ticket is purchased. (See below for Checked Baggage fees.)

4.3.3. Upgrades

Travelers are personally responsible for any costs associated with upgrades that are not permitted under this Policy.

4.3.3.1. Baggage

One carry-on baggage and one checked baggage are allowed, subject to the cost limitations in Sections 4.3.1 and 4.3.2. Any incurred fees for excess baggage are not reimbursable.

4.3.3.2. Accommodation of Disability

Notwithstanding Section 4.3.3, Travelers do not bear the cost of non-permitted upgrades to the extent they are necessary to comply with federal and state laws that require reasonable accommodation for or prohibit discrimination of Travelers with disabilities.

4.4. Departure and Return

4.4.1. Departure

Travel resulting in arrival one day prior to and/or one day after an event will be reimbursed if reasonably necessary because of time constraints. Travel resulting in arrival two days prior to and/or one day after international travel will be reimbursed as reasonably necessary based on the location.

4.4.2. Return

Traveler must return the same day the event ends unless the time of arrival is past 9:00 PM Pacific Time.

5. Ground Transportation

5.1. Mileage

Travelers may claim mileage reimbursement for business travel under this Policy in accordance with the IRS mileage rate applicable at the time of travel.

5.2. Mileage Permittee

Mileage Permittee reimbursements are not subject to the LACERA Staff Travel Policy. Under the Mileage Program Policy, a LACERA employee is eligible for mileage reimbursement if they are approved by Human Resources Division as a "Mileage Permittee" which is defined as a staff member in an assignment requiring them to regularly drive their personal vehicle to complete the essential job functions of their position, or to carry out LACERA business and services.

5.3. Personal Vehicle

The Traveler may be reimbursed for mileage only to and from the airport or event when using a personal vehicle. A personal vehicle may be used to travel to an event

in lieu of air travel if the mileage reimbursement would be less costly than airfare or if ground travel provides a reasonably convenient and more timely arrival to the event than air travel, up to a geographical limit of a California bordering state.

5.4. Ground Transportation Options at Event Location

Rideshare, taxis, trains, buses, or shuttles may be used for transportation to, from, and at the event location. Use of higher-tiered rideshares or executive car services is not permitted unless approved by the Chief Executive Officer, or their designee, unless it is the only option available at the time of purchase.

5.4.1. Rideshare

Limited to “Comfort” option of 4 to 6 occupants or similar.

5.4.2. Tips: Maximum Allowable

Limited to 20%, which may be rounded up to the next whole dollar. Tip calculation is inclusive of fare and fees.

5.5. Car Rentals

Car rentals are not permitted unless preapproved or required due to an emergency.

5.6. Parking

Parking, including airport parking, will be reimbursed at the actual rate (receipt required) for pre-approved travel dates. Standard parking rates are permitted under this policy. Reimbursement for amenities such as valet services is not permitted, unless it is the cheapest or only option available for parking but requires written justification and approval on the reimbursement request.

6. Lodging

Lodging is limited to hotels or motels. Room upgrades are not permitted under this policy. Traveler shall not use short-term rentals such as Airbnb, VRBO, or other similar short-term lodging.

6.1. Educational Trainings

Traveler shall stay at the primary hotel recommended by the educational training host or, if rooms are unavailable, at an overflow hotel recommended by the host. If there is no hotel recommended or available by the host, Traveler may choose a hotel to which the cost is limited to a standard class single room allowed under the lodging Per Diem Rate for the location, not including taxes and hotel fees.

6.2. Administrative Meetings

Traveler shall stay at a hotel within a reasonable distance of the location of the Administrative Meeting. The hotel rate shall not exceed the applicable lodging Per Diem Rate for the location.

6.3. Local Events

Hotels for local events in Los Angeles County are permitted based on CEO, or their designee, approval of the detailed written justification on the *Travel Authorization Request Form*.

7. Meals

7.1. Reimbursable

The cost of meals is reimbursable if incurred as part of traveling to or from an Event, or during an Event if a meal is not provided by the host, not included in the registration fee, or if the Traveler has dietary restrictions.

Travelers must not accept free meals from 3rd parties, as doing so would qualify as a gift under *FPPC regulations*. In such cases, the cost of the meal is not reimbursable to the Traveler, and LACERA must pay the actual cost of the meal directly to the 3rd party.

While Business Meals may occur during travel, they are categorized separately from typical travel expenses. The distinction lies in the purpose of the meal. Essentially, the classification depends on whether the meal is central to conducting business or is simply part of the travel process. Business Meals for business purposes are excluded from this Staff Travel Policy and covered in **LACERA's Corporate Credit Card Policy**. Staff shall not use the Corporate Credit Card to pay for meals unless the meal has been approved as a Business Meal under the Corporate Credit Card Policy.

7.2. Method of Reimbursement

Standard reimbursement of meals is based on Per Diem Rates.

7.3. Reimbursement of Meals During Travel and Event Days

Traveler is entitled to the Per Diem Rate for a meal during the days and times of the event during which no meal is provided by the event host. The first and last days of travel are reimbursed at 75 percent of the full day Per Diem Rate from the event location regardless of travel times (per GSA guidelines).

8. Incidentals

Incidental expenses are defined by the Code of Federal Regulations (CFR) as fees and tips given to porters, baggage carriers, and hotel staff and are reimbursed based on the Per Diem Rate.

9. Other Travel Guidelines

9.1. Extended Personal Travel

Traveler may extend the event with personal travel outside of the guidelines for Departure and Return in Section 4.4. **However, the costs associated with extended**

personal travel should be separated and itemized between personal and business travel, regardless of the airfare cost limits described in Section 4.3.1 and 4.3.2. Personal travel costs are not to be paid nor reimbursed by LACERA and Traveler shall not use LACERA's Corporate Credit Card for any extended personal travel expenses.

If business and extended personal travel expense charges cannot be separated, Traveler will use personal funds to pay for all travel costs and seek reimbursement from LACERA for the business expense portion only. Traveler is responsible for separating costs and providing an itemized expense reimbursement request to LACERA.

Authorized leave will be requested for personal travel on business days. Traveler is responsible for any expenses associated with the extended personal travel for any increase in the expense of LACERA travel over that which would otherwise have been incurred if there was no personal travel.

9.1.1. Airfare

Notwithstanding Section 4.3, airfare that exceeds the cost of airfare that would have been incurred had extended personal travel not occurred shall be reimbursed by the traveler. A cost comparison shall be submitted showing the authorized travel dates and cost of what the airfare would have been without the extended personal travel.

9.1.2. Lodging

The cost for lodging during authorized travel dates shall be paid or reimbursed by LACERA. Lodging for extended personal travel shall be paid by the Traveler.

9.2. Companion Travel

Travel companions are permitted. However, the costs associated with companion travel should be separated and are not to be paid nor reimbursed by LACERA, regardless of the airfare cost limits described in Section 4.3.1 and 4.3.2. Traveler shall not use LACERA's Corporate Credit Card for any companion travel related expenses.

If business and companion travel expense charges cannot be separated, Traveler will use personal funds to pay for all travel costs and seek reimbursement from LACERA for the business expense portion only. Traveler is responsible for separating costs and providing an itemized expense reimbursement request to LACERA.

The presence of a companion shall not be allowed to interfere with the full performance and participation by the Traveler in the purpose of the travel and associated events. The companion shall not participate in conference events, except at their own expense.

9.3. Loyalty Programs

Travelers may use their personal customer loyalty program membership number when making travel arrangements and retain benefits from airline and hotel customer loyalty programs. However, the use of such loyalty programs shall not result in any increased cost of travel under this Policy. The use of personal loyalty rewards to reduce the cost of travel under this Policy is not reimbursable.

9.4. Loss of Personal Property

Loss of personal property during travel on LACERA business is not reimbursable.

9.5. Other Business Expenses

Wi-Fi (hotel/flight), phone (international plan only), fax, printing, etc. necessary to conduct LACERA business during an event are reimbursable.

9.6. Missing Receipts

If a receipt is lost or damaged and cannot be retrieved or duplicated, the Traveler shall submit a *Pardon/Approval Request Form* documenting a description of the expense and the reason the receipt is missing.

9.7. Cash Advance

Cash advances will not be allowed unless specifically approved by the CEO or their designee.

10. Reporting

FASD shall submit regular monthly and quarterly reporting of trips, expenses, cancellations/credits to the Executive Office and to the Boards. The frequency, formatting, and information contained therein may be subject to change from time to time.

11. Violation of this Policy

Violation of this Policy may result in denial of reimbursement, limitation of travel privileges and/or withdrawal of approval for travel previously approved, and/or discipline, up to and including discharge.

VII. References

These references are intended to help explain this policy and are not an all-inclusive list of policies, procedures, laws, and applicable requirements. The following information complements and supplements this document:

Related Policies:

- [Code of Ethical Conduct](#)
- [Conflict of Interest Code](#)
- [Investment Division Travel Policy](#)
- [Corporate Credit Card Policy](#)

Related Procedures:

- [Staff Travel and Reimbursement Procedures](#)

Related Forms/Templates:

- [Pardon/Approval Request Form](#)

Other Related Information:

- [Emburse Professional - Travel and Expense Made Simple](#)
- [California Fair Political Practices Commission \(FPPC\) Regulations](#)

VIII. Version History

Original Issue Date: April 17, 2025

Policy Update/Review Summary: Previous policy version(s) superseded by this policy:

- LACERA Education and Travel Policy (Board Policy, 2018)

IX. Policy Review/Approval

This is an administrative policy and shall be reviewed every three years or as deemed necessary.