



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

TRAVEL POLICY & GUIDELINE

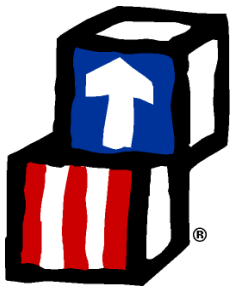
GUIDELINES FOR REIMBURSEMENT OF TRAVEL AND RELATED EXPENSES INCURRED IN ATTENDING MEETINGS, EDUCATIONAL PROGRAMS AND CONFERENCES

I. STATUTORY FRAMEWORK

A major goal underlying the Employee Retirement Income Security Act of 1974, as amended (“ERISA”) is the protection of “the interests of participants in employee benefit plans and their beneficiaries . . . by establishing standards of conduct, responsibility, and obligations for fiduciaries” of those plans. Among other things, the “prudent person” rule of ERISA, requires plan fiduciaries to be knowledgeable about the administration of the plan, the prudent investment of plan assets, and the judicial and regulatory environment in which the plan operates. In fulfilling this duty, ERISA permits a fiduciary to receive reasonable reimbursement for expenses properly and actually incurred in the performance of his or her duties with the plan, including expenses attributable to efforts to attain the level of education necessary to comply with the standard of behavior that the statute prescribes.

II. POLICY OBJECTIVES

The individual Board members recognize that it is their duty and responsibility to attend Board and any related Committee meetings (collectively referred to as “Meetings”), and will continue to attend these meetings, as well as any other meetings (e.g., Employer Trustee or Trustee caucuses) that have a direct relationship to the operation of the Board and during which it is intended that Board business will be discussed primarily. The Board also recognize that their continuing education is vital to comprehending, and remaining informed about, their various duties and responsibilities under ERISA and the Internal Revenue Code of 1986, as amended (the “Code”). Board member educational programs and conferences offer numerous advantages to the members (and, through them, the Fund), including the opportunity to gain substantial insight and knowledge crucial to performing their roles as fiduciaries prudently and in the interest of the Board’s participants (and their beneficiaries). In addition, by attending educational programs and conferences, the Board members will be better able to sharpen their fiduciary skills, as well as remain informed about current legislative regulatory developments under ERISA and the Code, employee benefit plan administrative issues, investment issues, etc.



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

The Board members have determined that it is prudent for the Board to establish these policy guidelines concerning the reimbursement of reasonable travel and related expenses actually incurred by the Member in attending meetings, caucuses or appropriate educational conferences, seminars and similar programs (The Guidelines) As an overriding principle, The Board Members shall be reimbursed under these Guidelines only for their actual and necessary expenses that are reasonable and directly related to the performance of their responsibilities as Board members or that are otherwise related to Board business.

In view of the foregoing, the Board Members reconfirm that the Sponsoring Board provide reimbursement for the reasonable, proper and actual expenses incurred by the Board Members while attending Meetings (or caucuses, where applicable), or appropriate educational programs, conferences and seminars. In order to ensure that such reimbursement is provided in the appropriate situations and in reasonable amounts, the Board Members have developed these Guidelines, which specify the circumstances under which reimbursement may be made with respect to the Sponsoring Board and the various limitations on such reimbursement.

SPECIFIC POLICY GUIDELINES

1. Number of Programs or Conferences.

In general, opportunities to attend programs and conferences will be considered by the Board on a case-by-case basis, taking into consideration the educational value of the particular program or conference. Each Member may attend, at the Board's expense, no more than one educational program or conference during any one Fiscal year, except in special circumstances (e.g., an educational program or conference related to recent legal developments).

2. Appropriate Educational Experience.

The Board Member may attend only those educational programs or conferences that: (i) are in the employee benefits area and address topics aimed at improving and maintaining skills required for the Board Member's performance of their duties; and (ii) are sponsored by a recognized organization in the employee benefits field (e.g., the International Foundation of Employee Benefit Plans, the American Institute of CPA's, the Society of Certified Employee Benefits Specialists, the American Bar Association, the Practicing Law Institute, etc.).

3. Educational Programs or Conference Locations

The Board Member may only attend education programs or conferences at locations in the United States or Canada, unless another location is approved in advance by the Board. If an educational program or conference is presented in more than one location, the Board Member should endeavor to attend either the conference closest to his or her home or the conference at the location that will generate the least amount of travel expense.

4. Program or Conference Registration Fees

Board Members will be reimbursed for all reasonable educational program or conference registration (and related) fees that they are required to pay.



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

5. Certificate of Attendance

Board members attending any educational program or conference or seminar on behalf of the Board are required to earn a certificate of attendance as a condition to payment and/or reimbursement of expenses related to that education program or conference or seminar. Whenever obtaining such certificate is reasonable or possible. Copies of certificate should accompany request for reimbursement.

6. Transportation to and from Meeting, or Program, or Conference Location

A. Air Transportation

Board Members will be reimbursed for air transportation to and from the location of the meeting, educational program or conference. Board Members must generally travel coach class. However, a Board Member may be reimbursed for travel in business class, or the equivalent thereof, if coach class accommodations would cause the Trustee potential injury or harm because the Board Member suffers from a documented medical condition, illness or injury.

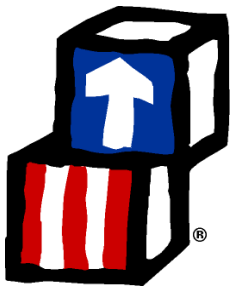
A Board Member may use an upgrade or similar benefit provided to him or her without cost to the Fund. A Board Member may also choose to pay the additional cost of an upgrade in order to travel in a class other than coach. If the Board Member “upgrades” to a class other than coach, he or she shall not be reimbursed for air travel at an amount higher than the cost of coach travel for that flight.

When possible, the Board Member should endeavor to purchase tickets sufficiently in advance of the travel date in order to obtain the lowest airfare possible, although these Guidelines recognize that it is not always practicable to do so.

Board Members should provide proof of payment, in the form of a proper receipt and your ticket stub, documenting the cost of the coach air travel actually incurred. A Travel itinerary from a travel agent will not count as proper proof of payment - an actual receipt is necessary for accounting purposes.

B. Ground Transportation

In lieu of air travel, the Board will reimburse the reasonable cost of travel to and from such location by train, bus or automobile. In no case may the total cost of train, bus or total automobile or rental car expenses exceed the cost of a single airfare ticket (determined based on Guideline 6 (A)) to the applicable location. The Board will only reimburse the reasonable cost of ground transportation calculated with reference to the most direct route between the origin and destination.



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

(1) Use of Personal Car

If a Board member chooses to travel to and from the Meeting, educational program or conference location by using his or her personal car, the fund will reimburse the Trustee (for gasoline, wear and tear, etc.) at the prevailing rate approved by the Internal Revenue Service for the reimbursement of automobile travel expenses, plus any properly receipted tolls. If the Trustee uses a company-owned car, he or she will receive reimbursement only for actual gasoline and properly receipted tolls. If mileage involves a Trustee's regular commute, mileage and parking should not be reimbursed.

(2) Use of Rental Car

If a Board member travels to and from the Meeting (or caucus, where applicable), educational program or conference location by rental car, the Board will reimburse the Board Member for the actual and reasonable daily rental cost, up to a maximum amount of \$125 per day (including all taxes, insurance and fuel costs), plus any properly receipted tolls.

Car rentals are reimbursable as long as the rental is reasonably necessary. A car rental will generally be reasonably necessary if, for example, there is significant distance between the airport and the lodging and/or between the lodging and the meeting such that traveling by rental car is not significantly costlier than traveling by taxi. In contrast, a car would not be reasonably necessary where the meeting and lodging is held adjacent to the airport. Generally, car rentals should be limited to non-luxury, full-size (or smaller) automobiles.

7. Local Transportation to and from Airport.

Board Members will be reimbursed for the reasonable and actual cost of taxi, bus, car service or similar transportation (excluding a limousine) for travel between his or her home and the airport (or bus or train station), and for travel between the airport (station) and the Meeting (or caucus, where applicable), educational program or conference location or hotel, subject to the maximum daily expense allowance in Guideline 9. Use of a rental car or a personal car for transportation between the airport and the Meeting or conference location will be reimbursed as provided in Guidelines 6 and 9.

Reimbursement for a Board Member's use of a taxi for local transportation may include a reasonable tip for the driver. If a Board Member uses a rental car or personal car for local transportation, he or she should not utilize a taxi during the same related trip, unless good cause can be demonstrated. Where feasible, Board Members should utilize the least expensive mode of local transportation to and from the airport.



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

8. Lodging

A. Direct Lodging Expenses

Board Members will be reimbursed for the reasonable and direct hotel, motel or similar lodging costs (at single occupancy, standard hotel room rates) actually incurred in connection with an attendance at Meetings (or caucuses, where applicable), educational program or conference, up to a maximum daily amount of \$250 per day (exclusive of any applicable taxes), unless a higher amount is agreed upon in advance by the Trustees. Reimbursement will not be made for suites (or other “luxury” hotel rooms), except where the lodging is at a “suite-only” facility and the price is comparable to a standard single occupancy room rate elsewhere. This paragraph relates to the cost of the room only; incidental costs are covered in the following section.

If a hotel bill includes a charge for a double room because of occupancy by a family member, when completing an expense reimbursement request, Trustees must subtract the difference between the double room and the single room and indicate on the bill only the balance being charged to the Fund.

B. Meal and Room Service Reimbursements

The cost of meals and any other incidental room charges (e.g., room service, telephone calls, parking, etc.) shall not be included as lodging costs, but should be listed and may be reimbursed as part of the allowances for daily expenses (within the limits of Guideline 9).

9. Daily Expenses.

A. Meals and Local Transportation

In reviewing lodging costs, the Trustees will take into consideration the fact that lodging costs are likely to be higher in certain locations (e.g., locations in California).

Board Members will be reimbursed for up to \$150 per day for the reasonable cost of local transportation, meals (where meals are not included in the Meeting or conference arrangements), and reasonable and necessary incidentals (e.g., room service, Fund- related telephone calls, parking, tips, etc.) actually incurred in connection with a Meeting, educational program or conference, unless a different amount is agreed upon in advance by the Trustees.

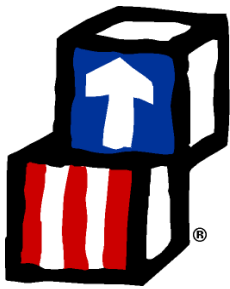
Daily reimbursable expenses will not include any entertainment-related or personal expenses, such as tickets to sporting or theater events, tennis or golf games. They will also not include charges for hotel mini-bars, personal telephone calls, business (but not Fund business) telephone calls, dry cleaning, shoe shines, newspapers, gym usage, spa fees, gift shop purchase or in-room movies.

If more than one Trustee attends meals for which those Trustees seek reimbursement, each Board Member will be able to obtain reimbursement. If a Board Member is dining with someone for whom the HSSBC cannot reimburse, the bill should not be split evenly - HSSBC will reimburse the Board Member based on his or her actual meal. HSSBC will not reimburse for the cost of alcoholic beverages.

B. Use of Rental Car for Local Transportation

In addition to the amount reimbursed for daily expenses pursuant to Guideline

9(A), with respect to Board Members who do not travel to and from the Meeting (or caucus, where applicable) or educational program or conference by personal car, payment will be reimbursed for car rental used for local transportation (within the limits set forth in Guideline 6).



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

10. Number of Days of Reimbursement.

A. General Rule

Reimbursement will generally be limited to the cost of local transportation, lodging and daily expenses only for the days that a Board Member is actually attending the Meeting (or caucus, where applicable) or the educational program or conference. However, if in the reasonable opinion of a Board Member it is necessary for the Board Member to stay at the hotel on the night before the meeting, program or conference (e.g., when a meeting, program or conference begins early enough the next day to make travel on the next day unfeasible) and/or the night following the conclusion of a program or conference (e.g., when the last scheduled portion of the meeting, program or conference ends late enough in the day to make travel on that day unfeasible), or if travel convenience (such as airline schedules or connections) warrants, the Board Member may arrive one day before (and/or stay one day after) the educational program or conference, and reimbursement will be provided for such additional days of local transportation, lodging and daily expenses.

There shall be two exceptions to this general rule, which are set forth in Sections 10. B. and C.

B. Saturday Night Stay-over

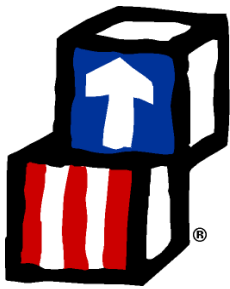
The first exception to this rule occurs where a Board Member submits evidence to the Treasurer that it is demonstrably less expensive to arrive earlier (or stay longer) at a Meeting (or caucus, where applicable) or educational conference or program or seminar because (i) the scheduled air travel to the location is less expensive if the Board Member stays overnight on a Saturday, and (ii) the additional cost of lodging, local transportation, and daily expenses, when aggregated for all of the extra days, is less than the airfare savings resulting from the fact that the Board Member stayed the extra day or days. Documentation submitted to the Fund to support the applicability of this exception should include a comparison of similar airfares on the two different possible days of travel. Where the additional cost incurred by a Saturday stay-over is greater, the excess cost will be considered a personal expense pursuant to Guideline 14 and the Board Member must reimburse the HSSBC for that amount.

C. Attendance at Annual Meeting of International Foundation of Employee Benefits Plans.

The second exception relates to the Board Members' attendance at the Annual Meeting of the International Foundation of Employee Benefit Plans, where pre-conferences and registration generally begin on the Friday or Saturday immediately preceding the commencement of the "general" sessions (which typically begin on a Monday); in which case, Board Member may arrive on the Friday immediately preceding the Monday on which such Annual Meeting commences.

11. Advances.

The Fund generally will not advance any monies to Board Members for the purpose of attending Meetings (or caucuses where applicable), or educational programs or conferences, with the following exceptions: (i) the cost of air, train or bus transportation between their home and the location of the meeting, program or conference; (ii) any program or conference registration (and related) fees; and (iii) a hotel deposit for one night's lodging (unless the hotel requires advance payment in full, in which case the HSSBC may advance the total of all hotel lodging costs permitted by Guideline 8, attributable to the actual days of the program or conference).



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

A. Conditions for Allowable Expenses

Advances made in accordance with the preceding paragraph shall be subject to the following conditions:

(i) the amount advanced must be reasonable with respect to the anticipated amount of direct expenses that are likely to be properly and actually incurred; (ii) the advance must be made no more than 30 days before incurring the actual expense; and (iii) the Board Member must account for the advance against the expenses at the end of the period covered by the advance. The restrictions in this paragraph shall not apply to advances or deposits made directly from the HSSBC to a hotel, airline, program or conference sponsor or other vendor for any of the reasons set forth in the preceding paragraph.

12. Expense Forms.

Board Members will be reimbursed by the Fund only after submitting to the Treasurer a fully completed and signed "Expense Reimbursement Form for Attending Board Meetings, Educational Programs or Conferences" (the "Expense Form") (in the form attached hereto as Exhibit A) to which has been appended copies of actual bills, ticket stubs, and other necessary receipts (e.g., travel agency receipts or itineraries alone will not be acceptable). A proper accounting of the time, place, amount and persons present must be clearly indicated on the expense reimbursement form before reimbursement will be paid from the Fund for any otherwise reimbursable expense. Expense Forms must be returned within 30 days of the return from the trip.

A. Receipt Requirement

Any single item of expense totaling \$25 or more must be accompanied by a proper receipt or voucher. Un-receipted expenditures in excess of \$25 per item will not be reimbursed or charged to the HSSBC. All receipts must be accompanied by a written description that makes the business purpose of the expenditure clear (if not otherwise clear from the face of the receipt or the expense reimbursement form).

13. Reimbursement Procedure

The HSSBC shall generally reimburse the Board Member in accordance with these Guidelines within 30 days after receipt by the Treasurer of the Expense Form. All Expense Forms shall be reviewed by the HSSBC for compliance with these Guidelines. Once the Treasurer approves the expenses, he or she shall forward the form to the President, noting specifically any expenses which are not reimbursable under the Guidelines. The President shall reimburse the Board Member for all approved expenses and bill the HSSBC for the same. Any significant deviation from the Guidelines shall be reported by the Treasurer to the HSSBC.

14. Personal Expenses.

Any costs or other expenses incurred by the Board Member, which (i) do not relate to the affairs of the HSSBC, (ii) relate to travel and/or hotel accommodations of a spouse or guest, or (iii) result from the presence of a spouse or guest at the Meeting (or caucus, where applicable) or educational program or conference, shall be considered personal expenses, which shall not be reimbursed by the HSSBC. The personal portion of expenses being deducted should be detailed directly on the receipt, rather than merely being deducted from the amount reported on the Expense Form in an un-detailed lump sum.



**Head Start Sponsoring Board Council of The City of
New York, INC.**

1120 Avenue of the Americas, 4th floor

New York, NY 10036

Tel: (212) 626-2644

Fax: (646) 380-3076

Serving the Head Start Community Since 1981

www.headstartsbdc.org

15. Expenses Paid by Service Providers.

A Board Member may not receive consideration for his or her personal account from a party dealing with the HSSBC in connection with a transaction involving the HSSBC. Thus, Board Members should not receive from a service provider items, services or payment for personal expenses such as extra days at hotels, non-HSSBC related meals, or entertainment and recreation (such as golf or tickets for games or shows). Board Members should not accept gifts from a service provider, reduced or waived banking fees, personal investment advice, use of a condo or vacation property, or free airfares and vacations. However, Board Members may attend a general client reception for a diverse group of clients of a service provider or open to the general employee benefits community (such as a social gathering at the annual conference of the International Foundation of Employee Benefits Plans). In addition, Board Members may receive payment from a service provider for a meal if the meal is for the purpose of HSSBC business and could otherwise have been reimbursed by the HSSBC itself.

16. Multiple Reimbursement.

The HSSBC will not reimburse a Board Member for an expense paid for or reimbursed by another party (e.g., an employer association, the union, his or her employer, another fund, etc.).

17. Allocation of Travel Expenses Among Other Agencies.

In the event that a Board Member incurs travel expenses for an educational program or conference in connection with more than one Agency (or other organization), such expenses shall be equitably allocated among such other Agency(s) or organization(s).

18. Publication.

A copy of these Guidelines (and any amendments thereto) shall be provided to each Board Member and the Treasurer, as well as to other individuals whom the HSSBC have determined properly may be reimbursed travel expenses by the HSSBC under these Guidelines. A copy of these Guidelines shall also be maintained on file at the HSSBC Office.

19. Reimbursement for Lost Wages.

Any Board Member who is not salaried, and does not receive full time pay from HSSBC may be reimbursed for work time lost due to attendance at a Board meeting, educational program or conference or while otherwise performing HSSBC business. Reimbursement shall be made by the HSSBC, equal to their standard work day that would have been paid to the Board Member by his/her employer had he/she performed his/her usual work duties and reimbursed to the HSSBC satisfactory documentation is submitted to the establish the expense.

20. Amendment.

These Guidelines may be amended or revoked at any time, and from time to time, by the Board of HSSBC in writing (including in the minutes of the Board).

IN WITNESS WHEREOF, the foregoing Guidelines for Reimbursement of Travel and Related Expenses Incurred in Attending Board Meetings and Educational Programs or conferences were duly adopted by the HSSBC Board of Directors, effective as of the 1st. day of 9th. Month 2011.