

## **NON-TRAVEL BUSINESS MEALS**

This Regulation is established to provide documentation and rules for reimbursement of the expense of non-travel business meals. Official business meals must involve substantive and legitimate agenda for a Monterey County Office of Education (MCOE) business purpose. This Regulation covers all business meals that are not already covered under AR 3350, Conferences and Travel, and for which a Travel and Expense Reimbursement Form is completed.

This Regulation applies to all MCOE employees, unless a condition is in conflict with specific provisions of State or federal program requirements. In such cases, the provisions of those program requirements shall prevail for the employees covered under those programs.

### **General Requirements:**

1. Authorized official business meals must clearly support the MCOE mission.
2. Non-travel business meals are reimbursed based on actual costs incurred up to the amount of the per diem rate.
3. MCOE will not reimburse expenses for meals at social events, such as retirement parties, holiday parties, and other personal employee celebrations.
4. A non-travel business meal must involve a task when mealtime is the best or only available meeting time.
5. A meal may be provided to attendees when a business meeting includes a working business meal, at which the attendance of participants is required, and the meal period is designated as a work session, which is documented in a meeting agenda. Business must be conducted during the meal period and provide a benefit to the MCOE, if the benefit of the meal allows the continuation and/or continuity of the meeting rather than dismissing attendees to obtain a meal.
6. Daily business of MCOE employees is not normally scheduled during mealtimes. When an exception arises and a meeting must include a working lunch, then it must be approved in advance by the Department Head and authorized by the Division Head.
7. MCOE employees may receive reimbursement for:

- a. Conducting a meeting on official MCOE business when no other time is available for the meeting
  - b. Providing formal training to other MCOE staff when it is of benefit for continuation of the meeting during mealtime
  - c. A meal period that is scheduled as an integral part of the meeting or formal training session.
8. An MCOE employee cannot receive reimbursement for:
- a. Hosting a perspective employee, unless authorized by the County Superintendent
  - b. Meals for professional organizations or industry representatives
  - c. Meals for employees of other agencies while visiting MCOE unless engaged in a business meeting with a substantive and legitimate agenda.
9. Written approval from a Division Head, at least one day in advance of the meeting or training session, for the expenditure of funds, must be obtained. The approval memo must include the requestor, employee and/or attendee names, the department or organization name, and a copy of the agenda.
10. Total reimbursement is limited to the actual cost of the meal(s) or per diem meal limits, whichever is lower.
11. Requestors and approvers of Non-travel business meal expenses are responsible to ensure the expenditure is appropriate and lawful. MCOE employees may be personally liable for obligations that are inappropriate or an improper use of funds. Division and Department Heads and the requesting employee are responsible to determine the appropriateness of non-travel business meal purchases, and to ensure that sufficient documentation exists to support the expenditure.
12. The cost of non-travel business meals must be within the program's budget.
13. Public funds shall not be used to provide non-travel business meals for regularly scheduled staff meetings.
14. Reimbursement for spouses attending meetings is not allowed.

**Documentation Required for Reimbursement**

When non-travel business meals are provided, the following recordkeeping should be used to account for the use of public funds:

1. Itemized receipts are required for reimbursement.

2. Written agenda or other forms of identification for the meeting documenting that it was a working business meal.
3. A completed copy of the Business Meal Certification Form (Exhibit 1), which includes the list of names of all meal participants, along with payee/title and justification showing the business necessity of the event.
4. A completed and approved Travel and Conference Reimbursement Form (Exhibit 2) that includes the Business Meal as an item for reimbursement must be submitted within 10 days following the end of the month of the expense.

**Other Important Issues**

1. No employee can approve his/her own reimbursements. Reimbursements must be reviewed and approved by at least one management level above the employee submitting the reimbursement request. The Division Head must approve the Business Meal Certification form. The Division Head certifies the reimbursement request had a valid MCOE business purpose.
2. MCOE Business Services staff will audit the Travel and Reimbursement Claim Form (with any supporting documentation) and the Business Meal Certification Form (with any supporting documentation) prior to payment for reimbursement.

*Legal Reference:*

*EDUCATION CODE  
1081 Travel Expenses*

*TITLE 5 CODE OF REGULATIONS  
17430-17435 Expenses for County Superintendent of Schools and Staff*