## Travel Expense Review CY 2017-2019

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March 2021

## **Executive Summary**

At the March 2020 Audit/Compliance Committee meeting, a review of the travel expenses incurred for all PSERS staff and Board of Trustees for calendar years 2017-2019 was requested.

#### Purpose:

The objective of the review was to ensure PSERS staff are complying with the Gift Ban Policy, adhering to Commonwealth travel guidelines, and to determine who contractually was paying for travel costs for PSERS staff and Board trustees.

#### **Background:**

Currently, the travel expenses for PSERS staff and the Board of Trustees can be reimbursed by

- 1. the Commonwealth of Pennsylvania (the System)
- 2. paid by the System first and then reimbursed by a third party
- 3. paid directly by a third party according to contract.

A news article was published in December 2019, calling into question the transparency of the expenses being paid by third parties.

## **Executive Summary**

#### Scope:

Internal Audit Office reviewed the travel expenses for the period of January 1, 2017 through December 31, 2019 to determine if there were any violations to Commonwealth policies and guidelines as well as PSERS policies in effect at the time.

Resolution 2020-26, Re: Travel Policy, August 7, 2020

https://www.psers.pa.gov/About/Board/Resolutions/Pages/2020-Board-Meeting-Resolutions.aspx Excerpt:

- RESOLVED, all travel expenses incurred by Trustees, the Executive Director, the Chief Investment Officer and designated investment staff of the Fund shall be publicly disclosed and reported to all members of the Board of Trustees quarterly. The quarterly travel disclosure report shall include, at a minimum, the full name of the person traveling, the approved purpose of the travel, the dates of travel, the locations of travel, a description of the travel, including identification of any investment or fund managers, partnership, consultants, investment properties visited or investment operations reviewed. The quarterly travel disclosure report shall also include a detailed account of all individual expenses incurred in excess of fifty dollars (\$50) and the source or sources of payment or reimbursement of any such expenses, including any such payment or reimbursement by any investment fund, manager, management company, partnership, consultant or sponsoring association, trade group other profit or non-profit entity, without regard as to whether or not the incurring of the expense, or the payment or reimbursement, is made directly by or to the traveler or the System if not otherwise paid by the System without reimbursement from another source.
- RESOLVED, that the System shall prepare a report to be submitted to the members of the Audit Committee of the Board providing the information specified in the paragraph above for travel expenses incurred by the Executive Director, the Chief Investor Officer, and investment staff of the System, for the period of calendar years 2017-2019, not later than the December 4, 2020 Board Meeting.

## **Executive Summary**

#### **Results:**

- No violations were found as part of the review. Improvements to the travel approval and reimbursement processes have been identified.
- Internal Audit Office presented the CY 2019 travel report to the Audit/Compliance Committee in December 2020.

# Travel Expense Review Policies

#### Commonwealth Policies

- Commonwealth Travel Policy, Management Directive 230.10
- Commonwealth Travel Procedures Manual, Manual 230.1
- Out-of-State Travel submission exception
  - Exception# 6621 allows identified PSERS positions (staff and Board) to exceed the monetary limits for lodging and subsistence published in Manual 230.1
  - Exception# 6621 allows identified PSERS positions (staff and Board) to incur subsistence expenses on behalf of others in accordance with Section 4.5 of Manual 230.1
  - Out-of-State Travel submission exception (Governor's Office approval no longer needed)
- Commonwealth Out-Service Training, Management Directive 535.3

#### **PSERS Policies**

- - Statement of Organization, Bylaws, and Other Procedures of the Commonwealth of Pennsylvania (Bylaws)
    - Article VI Standards of Official Conduct
      - Section 6.3 Additional Standards
        - (c) Expenses of Official Business
- Education Policy of the Commonwealth of Pennsylvania Public School Employees' Retirement Board
  - Section VII Educational/Industry meetings
  - Section Viii International meetings

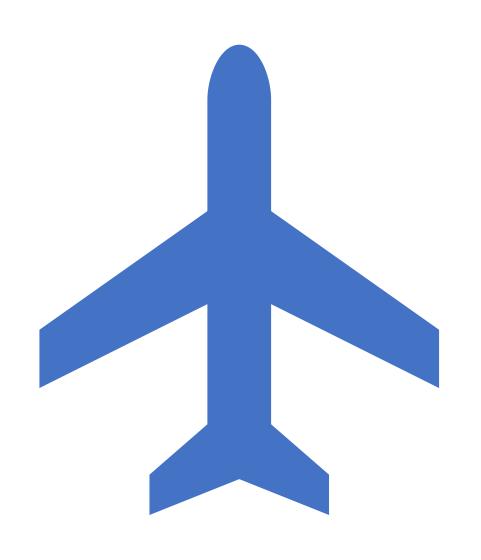
Travel
Expense
Review
Policies
(cont'd.)

## Travel Expense Review Methodology

- Identify the types of PSERS travelers and their reasons for travel
- Identify the pre-travel approval process for each traveler type by travel location
  - In-state
  - Out-of-state
  - International
- Identify travel reimbursement process
  - Approval of System-paid travel expenses
  - Approval of reimbursement by a 3rd party for System-paid travel expenses
  - Direct vendor-paid travel according to contract
- Identify contract language that currently allows vendors to pay/reimburse PSERS for staff travel expenses

Key
Opportunities
for
Improvement

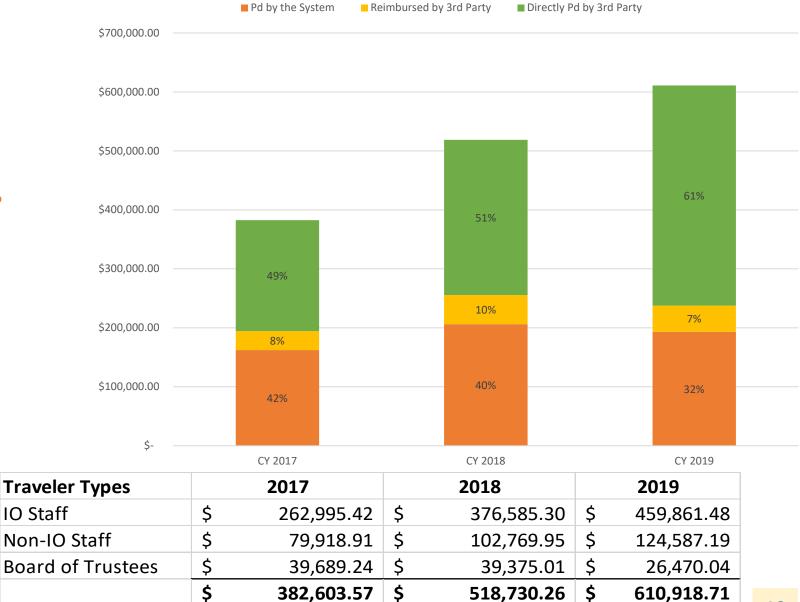




## Travel Expenses CY 2017-2019

**Key Statistics** 

#### Total Travel Expenses by Calendar Year



- The travel expenses have gradually been increasing throughout the years as net assets grew and the asset allocation changed.
- Majority of the travel expenses have been paid by third parties according to contract for the three years in review.

**IO Staff** 

## Top Reasons for 3<sup>rd</sup> Party-Paid Travel

| 2017                       | % of Total \$<br>Paid | 2018                       | % of Total \$<br>Paid | 2019                       | % of Total \$<br>Paid |
|----------------------------|-----------------------|----------------------------|-----------------------|----------------------------|-----------------------|
| Advisory/Annual<br>Meeting | 78.22%                | Advisory/Annual<br>Meeting | 64.80%                | Advisory/Annual<br>Meeting | 64.11%                |
| Conference                 | 7.70%                 | Conference                 | 17.33%                | Due Diligence              | 18.73%                |
|                            |                       | Due Diligence              | 11.17%                |                            |                       |

#### Note:

- 1. Reasons were provided by the vendors. However, the terminologies used by vendors are not standardized. It is recommended that standardized terms be used going forward.
- 2. Due Diligence as listed above were site visits conducted by PSERS Investment Office personnel.
- 3. Only reasons with a percentage of >5% are shown.

## Third-Party-Paid Travel Expense Reports

- Travel expense reports have been created for calendar years 2017, 2018, and 2019.
- Reports include the traveler, dates of travel, destination, purpose of travel, the vendor who paid for travel and a breakdown of the expenses paid.
- Reports are available on Diligent
- Supporting documentation that was created by a PSERS staff member is available upon request. Documentation from vendors providing expenses totals are also available but may not include actual invoices.

## Sample of Travel Expense Report

- Report Includes:
  - Name of the traveler
  - Travel Dates
  - Destination
  - Name of the third-party who paid for the expenses
  - Purpose of the travel
  - Description including funds, properties, etc. that were visited or discussed
  - Breakdown of travel expenses
- Reports are subtotaled by the third-party vendors

#### PSERS Travel Expenses Paid or Reimbursed by Third Parties Calendar Year 2017

|                      | Annual Control |              |             | 100000        |                                 |                         | Description                                                      | 2000 00 13    |            |                     |             |                  |               |                               |               |
|----------------------|----------------|--------------|-------------|---------------|---------------------------------|-------------------------|------------------------------------------------------------------|---------------|------------|---------------------|-------------|------------------|---------------|-------------------------------|---------------|
|                      | Travel Dates   | Travel Dates |             | Travel        |                                 |                         | (Investment/Fund Managers, Partnerships, Consultants, Investment | Air/Train/Bus |            | CHARLES AND AND AND | Mileage/Car | Travel Agent Svc | Miscellaneous | Miscellaneous                 |               |
| Traveler             | From           | То           | Travel City | State/Country | Charge to                       | Travel Purpose          | Properties visited or Investment Operations reviewed)            | Fare/Taxi     | Hotel      | Subsistence         | Rental      | Fee              | Dollars       | Description                   | Total Dollars |
| Jeffrey Burton       | 6/20/2017      | 6/23/2017    | Boston      | MA            | Acadian Asset Management        | Due Diligence           | N/A                                                              | \$46.00       | \$771.40   | \$24.43             | \$0.00      | \$0.00           | \$0.00        |                               | \$841.83      |
| Raymond Schleinkofer | 6/20/2017      | 6/23/2017    | Boston      | MA            | Acadian Asset Management        | Due Diligence           | N/A                                                              | \$89.47       | \$771.40   | \$0.00              | \$0.00      | \$0.00           | \$0.00        |                               | \$860.87      |
| Thomas Bauer         | 6/20/2017      | 6/23/2017    | Boston      | MA            | Acadian Asset Management        | Due Diligence           | N/A                                                              | \$0.00        | \$771.40   | \$32.22             | \$0.00      | \$0.00           | \$0.00        |                               | \$803.62      |
|                      |                |              |             |               | Acadian Asset Management Total  |                         |                                                                  | \$135.47      | \$2,314.20 | \$56.63             | \$0.00      | \$0.00           | \$0.00        |                               | \$2,506.32    |
| Michael Tyler        | 4/24/2017      | 4/27/2017    | London      | UK            | Actis Global 4, L.P.            | Advisory/Annual Meeting | Actis Emerging Markets 3, L.P.                                   | \$0.00        | \$385.84   | \$0.00              | \$5.35      | \$0.00           | \$19.00       | Parking                       | \$410.19      |
| Michael Tyler        | 4/24/2017      | 4/27/2017    | London      | UK            | Actis Global 4, L.P.            | Advisory/Annual Meeting | Actis Global 4, L.P.                                             | \$0.00        | \$385.84   | \$0.00              | \$5,35      | \$0.00           | \$19.00       | Parking                       | \$410.19      |
| Michael Tyler        | 12/13/2017     | 12/14/2017   | New York    | NY            | Actis Global 4, L.P.            | Advisory/Annual Meeting | Actis Global 4, L.P.                                             | \$96.00       | \$0.00     | \$0.00              | \$0.00      | \$0.00           | \$0.00        | /                             | \$96.00       |
| A115 ( = 114         |                |              |             |               | Actis Global 4, L.P. Total      |                         |                                                                  | \$96.00       | \$771.68   | \$0.00              | \$10.70     | \$0.00           | \$38.00       |                               | \$916.38      |
| Robert Little        | 4/30/2017      | 5/2/2017     | Hamilton    | Sermuda       | Aeolus Capital Management, L.P. | Due Diligence           | Aeolus Property Catastrophe Keystone Fund, LP - J13              | \$26.44       | \$41.85    | \$3.11              | \$0.43      | \$0.00           | 100,000       | Baggage Fee,<br>Parking & Tip | \$73.05       |
| Robert Little        | 4/30/2017      | 5/2/2017     | Hamilton    | Bermuda       | Aeolus Capital Management, L.P. | Due Diligence           | Aeolus Property Catastrophe Keystone PF Fund, LP - J16           | \$26.44       | \$41.85    | \$3.11              | \$0.43      | \$0.00           |               | Baggage Fee,<br>Parking & Tip | \$73.05       |
| Robert Little        | 4/30/2017      | 5/2/2017     | Hamilton    | Bermuda       | Aeolus Capital Management, L.P. | Due Diligence           | Aeolus Property Catastrophe Keystone PF Fund, LP - J17           | \$26,44       | \$41.85    | \$3.11              | \$0.43      | \$0.00           | * TOOLS       | Baggage Fee,<br>Parking & Tio | \$73.05       |



## Questions