## TRIBAL INTERNAL CONTROL STANDARDS (TICS)

## OSAGE NATION GAMING COMMISSION

May 21, 2024

ONGC Commissioners allow approval of the following change to the Tribal Internal Control Standards (TICS) of the Osage Nation Gaming Commission and posting the following to the Osage Nation website as TICS Revision #24-04:

## ONGC NOTICE OF PROPOSED TICS REVISION 2nd Comment Period: 30 Days

Osage Nation Gaming Commission Notice of TICS Revision #24-04 dated: May 21, 2024

The Osage Nation Gaming Commission is proposing the following TICS revision.

Comments may be made by interested parties for 30 days. Comments need to be mailed to the Osage Nation Gaming Commission at 612 Leahy Avenue, Pawhuska, Ok. 74056 or emailed to <a href="mailed-embree@osagenation-nsn.gov">ehembree@osagenation-nsn.gov</a>, please state TICS Comment in the subject line of all emails.

## Proposed Amendments to the Osage Nation Gaming Regulations: Section 350.21 350.21 Travel by Osage Nation Gaming Enterprise Employees

(a) Definitions: The following definitions are used in travel by Osage Nation Gaming Enterprise Employees (ONGE):

"Local Travel" is any travel that occurs within one-hundred (100) miles of the employee's normal worksite.

"Non-Local Travel" is any travel that occurs when an employee travels outside a one-hundred (100) mile radius of the employee's normal worksite.

"Travel Agent" means an individual, individuals, department, or company that arranges airline tickets, hotel rooms, rental cars, and other accommodations for individuals or groups of individuals traveling for company business or trainings.

"Traveler" means the Osage Nation Gaming Enterprise (ONGE) Employee who is approved to travel for Osage Nation Gaming Enterprise business.

- (b) Osage Nation Gaming Enterprise may pay for ordinary, necessary, and reasonable travel expenses for Employees who are required to travel to conduct authorized business on behalf of the Company pursuant to an adopted Travel SICS. All travelers shall adhere to all company Travel SICS, policies, and procedures during local and non-local travel.
- (c) All Non-Local Travel must be requested in writing and approved in advance on travel authorization documentation. The travel documentation must state the business purpose of the Non-Local Travel. All Non-Local Travel documentation must be signed by the requester and by a supervisor of the traveler showing approval.
- (d) For local travel mileage, all approved travelers using their Personally Owned Vehicles (POV) will be reimbursed by a request on travel documentation using the mileage rate that is set by the

Internal Revenue Service (IRS). All mileage reimbursement requests must be signed by the requester and by a supervisor of the traveler showing approval.

- (e) A designated travel agent will be responsible for making the most cost-effective travel plans for Non-Local Travel that require air flights, hotels, rental cars, and other approved expenses. Consistent with this regulation, travel by an air carrier must be in the most cost-effective manner and utilize the lowest possible coach fares consistent with scheduling requirements, unless cost exceptions are approved by the Osage Nation Gaming Enterprise. The travel agent arranging overnight accommodations is responsible for ensuring that the most reasonable and economical lodging rates are obtained.
- (f) All travelers may receive reimbursement for expenses outlined in subsection (g) up to a rate that may be set by the Osage Nation Gaming Enterprise Board (ONGEB). Such reimbursement rates may not exceed the per diem set by U.S. General Services Administration (<a href="https://www.gsa.gov/perdiem">https://www.gsa.gov/perdiem</a>) rates for the travel destination at the time of travel. If no rate is set by the ONGEB, then the traveler shall receive a per diem equal to U.S. General Services Administration (<a href="https://www.gsa.gov/perdiem">https://www.gsa.gov/perdiem</a>) rates for the travel destination at the time of travel. If no rate exists, then the rate may be a fair and reasonable reimbursable rate. A per diem is not allowed for local travel, nor are any other expenses allowed to be reimbursed except for mileage.
- (g) Reimbursable expenses while on Non-Local Travel status include, but are not limited to, the following:
  - Airfare change fees, if change required by business needs
  - Baggage handling services
  - Business office expenses (copy services, postage, supplies)
  - Business related phone calls, faxes, and internet usage charges and fees
  - Transportation costs from lodging or businesses to restaurants
  - Conference/Registration fees
  - Insurance: Trip cancellation (only for situations where a non-refundable airfare was booked for a trip where interruption/cancellation is likely and insurance coverage is less expensive than a fully refundable airfare)
  - Laundry and cleaning expenses on trips lasting seven calendar days or more

Non-reimbursable expenses include, but are not limited to, the following:

- Airline, car, and card membership dues and club fees, including daily club fees
- Air travel/TSA Pre-Check expedited security clearance memberships
- Travel upgrade fees, when fees are for personal choice rather than business need
- Alcoholic beverages
- Bank charges for ATM withdrawals
- Check cashing fees
- Childcare and dependent care costs
- Clothing and toiletry items
- Expenses related to vacation or personal days taken before, during, or after a business trip
- Gas/fuel charges for personal vehicles (the approved mileage rate includes estimated allowance for gas, wear and tear on the vehicle, and maintenance)

- Expenses that are not paid out of pocket or paid with gift cards
- Haircuts and personal grooming
- Insurance: Personal Accident for rental cars and other personal expenses such as rental of child car seats, additional driver (unless on official OC business), and roadside assistance
- Laundry, cleaning, pressing costs for trips of less than seven days
- Lost Baggage
- · Loyalty or reward points
- Luggage or briefcases
- Medical expenses while traveling (Exceptions may be made to accommodate ADA compliance)
- Mini-bar charges
- Movies and pay-for-view entertainment
- No-show/Cancellation fees or fees related to hotel late check-out (unless business or weather related)
- Non-insured loss of cash/personal belongings
- Personal reading materials (magazines, newspapers, etc)
- Personal vehicle maintenance (the approved mileage rate includes estimated allowance for gas, wear and tear on the vehicle, and maintenance)
- Personal entertainment
- Personal pet care
- Personal business gifts
- Recreational expenses including fitness center access and spa treatments
- Traffic citations, parking tickets, court fees, or other fines
- Travel accident insurance premiums
- · Travel expenses for dependents that accompany employees on official business trips
- Valet services for parking, when self-parking options are available, unless there are valid security reasons