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Chief, Finance Division

- Administrative/Finance
- Travel Reimbursement Policies

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REF (a) [redacted]
(b)
(c)

1. The questions presented in paragraph 1 of reference (a) are discussed below in the order presented:

a. The procedure outlined in reference (c) does not constitute a change in either KUBARK or ODYOKE Regulations. Rather, it is a clarification of the application of the 20% deduction rule which was based on an official ODYOKE decision, and as such, represents clarification of audit criteria and procedures.

With respect to the implementation of interpretations of instructions and/or modification of procedures or provisions of regulations as presented in dispatches from this office, such actions receive appropriate Headquarters' coordination prior to release, and receipt of such dispatches constitute authority for implementation of the actions or policies discussed therein.

b. Implementation of the provisions of amendments to Standardized Travel Regulations may be effected effective with the dates stated in the transmittal memoranda. It is realized that this action is not entirely in accord with the literal interpretation of [redacted] as presently constituted. At the time of the issuance of [redacted] however, the intention was to adopt, insofar as practicable, the standardized regulations. Present inconsistencies are due largely to the fact that [redacted] has not been amended to reflect all changes to maintain consistency with Standardized Regulations since 1953. As indicated in reference (b), however, it is not intended that KUBARK travel regulations be any more restrictive than for ODYOKE.

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c. Insofar as is considered appropriate, all changes reflected in budget circulars will be incorporated in KUBARK Regulations, either by reference or by complete text. As you know, Headquarters has been endeavoring to develop comprehensive regulations which will be complete in themselves. This approach, however, has not been fully accepted and it may be that the ultimate approach may be to rely primarily on ODYOKE general issuances and only to supplement these regulations as necessary to provide for particular circumstances or to define general policy. In any event, the total area of travel regulations is under review and clarification and firm policy should be forthcoming presently.

With respect to the specific point of application of an "appropriate" rather than a 20% deduction rule, uniform and equitable treatment of all employees will undoubtedly require establishment of a standard deduction. For the present at least, it has been determined that the deduction should be continued at 20% as provided by present regulations.

2. The policy with respect to deduction for furnished quarters presented in paragraph 5 of reference (a) appears to have merit and will undoubtedly receive considerable support. As indicated above, however, pending publication of a revised overall policy, it would not be considered proper for any station to implement a local policy providing for less than the standard 20% deduction.

3. In connection with implementation of modifications of general ODYOKE Regulations, as you know, these regulations often do not specifically define the basis for or amounts of reimbursement of expenditures but rather they impose a requirement that administrative determination be made within specified limits. The "appropriate" deduction clause is an example of this type clause. Another of longer standing is the provision with respect to per diem rates. The implementation of either of these clauses requires policy determinations by each ODYOKE Agency. Even if KUBARK were to adopt the policy of relying to the maximum extent on general ODYOKE Regulations, areas such as these cited above would require specific regulatory action.

4. We regret the error in release of reference (c) which resulted in failure to supply the station with a copy. We appreciate your calling this matter to our attention and trust the omission will not occur again. We are forwarding a copy for completion of your files.

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Enclosure - 1

Distribution: Orig. & 2 - [redacted] w/encl

2 - EE Div; 1-TAS; 1-O&L/FD; 1-P&T/FD; 2-FD

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ORIGINAL DOCUMENT MISSING PAGE(S):

Attachments

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