Sec. 1. PURPOSE OF POLICY.

The Board of Directors (the "Board") of IPS Enterprises, Inc. ("IPS") shall endeavor to maximize the use of IPS's funds for travel expenses incurred to further IPS's mission. This policy shall also track the policies of IDEA Public Schools subject to Board differentiation contained herein or otherwise approved by the IPS Board.

Sec. 2. <u>AUTHORITY OVER FISCAL MATTERS</u>.

- (a) Subject to the provisions of Section 4.4 of the IPS Bylaws relating to actions to be approved by the CEO or the Sole Member, the business, property, and affairs of IPS shall be managed and all powers of IPS shall be exercised by or under the direction of the Board. In the event of a conflict between this policy and any other Board policy, such conflict shall be brought to the Board for resolution. Refer to the Board's Authority Over Fiscal Matters Policy (the "Controlling Policy," Finance Policy 1.0) for requirements applicable to this policy.
- (b) The Officers of IPS (as defined in Sec. 5 of the Controlling Policy) shall report to the Board any business arrangement or transaction with an individual that is an Officer and any conflicted, interested, or related party, as defined in other Board policy or applicable law. IPS (and its Officers) may not enter into a business arrangement or conduct a transaction in such a manner so as to circumvent this requirement.

Sec. 3. KEY TERMS.

- (a) *Duty point* means the destination, other than a place of employment, to which an IPS employee travels to conduct official IPS business. ¹
- (b) Local travel means travel related to official IPS business within the 100-mile radius of the Officer or employee's place of employment and residence (using the most direct route).
- (c) Non-local travel means travel related to IPS business outside of the 100-mile radius of the Officer or employee's place of employment and residence (using the most direct route).
- (d) Overnight trip means non-local travel requiring an overnight stay.
- (e) Place of employment means the office or other physical location at which an IPS employee most frequently conducts official IPS business. If an IPS employee has more than one place of work, the following factors are determinative of which one is the employee's main place of work:
 - (1) The total time the employee ordinarily spends at each place;
 - (2) The level of the employee's business activity in each place; and
 - (3) Whether the employee's income from each place is significant or

¹ TexTravel, Definitions (https://fmx.cpa.texas.gov/fmx/travel/textravel/gen/def/index.php).

insignificant.

Sec. 4. GENERAL.

- Sec. 4.1. IPS Officers and employees will be reimbursed for reasonable travel expenses incurred in connection with official IPS business. Officers and employees must observe the Prudent Person Rule under Sec. 7 of the Controlling Policy when traveling, or approving travel, to avoid expenditures that appear to be extravagant or lavish, personally enriching, abusive and wasteful. See Finance Policy 1.0, Authority Over Fiscal Matters, at Sec. 8. Importantly, ALL Officers and employees must use discretion when making travel arrangements to ensure the conservation of IPS's limited financial and other resources.
- Sec. 4.2. IPS shall only reimburse expenses that conform with applicable travel requirements pertaining to maximum allowable rates for reimbursements and that are reasonable and necessary. To the degree appropriate and necessary, in addition to employees, IDEA shall apply the requirements adopted under this Board policy to any third-party requesting the reimbursement of expenses incurred for travel conducted on behalf or for the benefit of IDEA, including external candidates for employment, independent contractors and volunteers. Notably, IDEA shall apply any limitations placed upon and record requirements for travel expenses in the same manner as applied to IDEA employees. IDEA officers and employees shall inform any third-party of IDEA's policies in this regard in the form prescribed by the Business Office.
- Sec. 4.3. Officers and employees are responsible for adequately and clearly stating the business purpose of the trip and the nature of the expenditures. Officers and employees are responsible for ensuring that all expenses are appropriate and in compliance with this policy and applicable law. Officials and employees traveling on official business will be reimbursed for appropriate expenses incurred. IDEA shall only reimburse expenses that conform with applicable travel requirements pertaining to maximum allowable rates for reimbursements and that are reasonable and necessary.
- Sec. 4.4. For each calendar month during which official business travel is conducted, Officers and employees must submit their travel reimbursement requests on or before the last day of the subsequent calendar month. Officers and employees who submit their travel reimbursement requests timely shall receive their reimbursements timely.
- Sec. 4.5. Unless authorized in this policy, IPS shall not allow any exceptions to this policy.
- Sec. 4.6. Any expenses incurred while traveling on behalf of IPS that are not associated with official IPS business will not be reimbursed. An example of such an expense is illegal parking tickets and speeding tickets. Additionally, IPS may not pay the travel expenses of spouses and other persons who have no responsibilities or duties to perform for IPS when they accompany Officers or employees to IPS activities, events, and functions.

Sec. 5. SOCIAL ACTIVITIES.

Cost of entertainment, including amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities) are unallowable.

Sec. 6. TRAVEL BY COMMERCIAL AIRLINE.

- Sec. 6.1. Officers and employees shall not travel by charter or other private aircraft. IPS shall not reimburse any cost incurred violative of this policy statement and shall report any violation to the Board.
- Sec. 6.2. When traveling via a common, commercial airline, without exception, all Officers and employees shall only make coach-class accommodations.
- Sec. 6.3. Subject to the reporting requirement under Sec. 2.2 of this policy, the Chief Financial Officer ("CFO") may authorize an upgrade to the most economical seating if an Officer or employee has a disability that requires additional leg or seat room to accommodate the traveler's disability.
- Sec. 6.4. When making travel arrangements via a common, commercial airline, Officers and employees must make arrangements at the lowest available non-refundable coach airfare at least at least 14 calendar days before traveling or on the date that the Officer or employee is directed to travel to conduct official IPS business. If the Officer or employee is not able to make such a travel arrangement, arrangements may be made via a common, commercial airline at the lowest available fully refundable coach airfare. In making travel arrangements at the lowest available airfare, Officers and employees are not required to:
 - (a) Use an airline other than a major carrier;
 - (b) Arrange travel that includes several or lengthy layovers; or
 - (c) Use a distant airport.

Sec. 7. TRAVEL BY GROUND TRANSPORTATION.

IPS may reimburse an Officer or employee for the cost of bus, rail, ride sharing, taxi or other common public transportation used between the Officer or employee's private residence, airport or other common carrier hub, place of employment and duty point. Officers and employees must use the most reasonable and economical mode of transportation available.

Sec. 7.1. Rail.

Upon prior approval by the CFO, Officers or employees may purchase fares for common, commercial passenger rail transportation.

Sec. 7.2. Rental Vehicles.

- Sec. 7.2.1. Officers or employees may rent vehicles to conduct official IPS business provided that the travel expense does not exceed the cost for any other mode of transportation.
- Sec. 7.2.2. Officers or employees traveling together may rent a standard-sized or full-size car. Officers or employees traveling by themselves may only rent an economy or intermediate-sized car. Officers and employees shall not rent sport utility, premium, elite, luxury or other similarly classed vehicles.
- Sec. 7.2.3. Officers and employees must provide written justification when upgrades are obtained at an additional cost or when the vehicle rented is other than an economy, intermediate-sized or

standard-sized or full-size car.

Sec. 7.2.4. Officers and employees shall submit original receipts for car rental expenses. When renting a vehicle, Officers and employees shall present the "Motor Vehicle Rental Exemption Certificate" in order to avoid being charged taxes.

Sec. 7.2.5. Officers and employees must report any vandalism, thefts, or accidents of a rental car to the police and must obtain copy of the police report filed and must report any accident involving a rental car to the rental car agency, the local authorities, and any necessary department.

Sec. 7.3. Personal Vehicle.

- Sec. 7.3.1. Officers and employees may use their personal vehicles to travel on official IPS business, including transportation to and from the various campuses. In this event, Officers and employees shall be provided a mileage reimbursement based on the standard rate set by the U.S. Internal Revenue Service ("IRS") for business use of an automobile with no additional reimbursement for carrying passengers. Travel reimbursement for business use of personal vehicles includes the actual direct miles to the business destination from the Officer or employee's place of employment, including their private residence if such is the Officer or employee's approved place of employment. Reimbursement may be requested for round trips from the Officer or employee's private residence and the airport for flights leaving on weekends. Travel between an Officer or employee's private residence and place of employment (commuting) is not a reimbursable item.
- Sec. 7.3.2. In the event a private vehicle is used in lieu of commercial transportation (rental, air, bus or rail), IPS shall only reimburse the Officer employee for the mode of transportation that would have resulted in the lowest costs. IPS shall not reimburse an Officer or employee for the costs of operating a personal vehicle, including routine maintenance and repairs.
- Sec. 7.3.3. Officers and employees shall maintain adequate liability and collision insurance, as required by the state in which the vehicle is registered, on any and all personal vehicles used for travel.
- Sec. 7.3.4. IPS may provide monthly auto allowances for an Officer or employee's use of a personal vehicle for official IPS business. In this event, IPS shall report the auto allowance as taxable income on the employee's Form W-2.

Sec. 8. LODGING.

- Sec. 8.1. Officers and employees should exercise good judgment in booking accommodations, considering proximity to the business location as well as cost. Officers and employees may not stay at extravagant or lavish accommodations, such as resorts and ski lodges. Moreover, IPS shall not arrange for meetings, professional development, or any other event at such accommodations.
- Sec. 8.2. Officers and employees attending conferences and training may stay at the conference hotel or conference partner hotels. However, IDEA shall only reimburse the employee for the actual cost not to exceed the maximum allowable rate as published by the U.S. General Services Administration ("GSA"). Employees should always check for the conference negotiated rates and/or request the hotel's GSA rates. In the event that the conference hotel or conference partner

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hotels do not have any availability, officers and employees may stay at an alternate lodging establishment provided that they obtain prior approval of any incremental cost, as established under Sec. 13 of this policy, and that they demonstrate that they made a good faith effort to find accommodations within a five (5) mile radius at a cost within the threshold established under Sec. 13 of this policy. If the threshold cannot be met at the conference hotel, conference partner hotel or another hotel within the above radius, a higher lodging rate may be approved. See Sec. 13 of this policy for further direction.

- Sec. 8.3. Officers and employees are responsible for canceling hotel and other arrangements if a trip is cancelled and for presenting a "Hotel Occupancy Tax Exemption Certificate" during the check in process.
- Sec. 8.4. IPS shall only reimburse an officer or employee for the actual cost of lodging for the city and state to which the employee traveled, up to the maximum allowable rates promulgated by the GSA. If GSA does not publish a lodging rate for the duty point to which the Officer or employee traveled, IPS shall apply the standard GSA lodging rate.
- Sec. 8.5. Officers and employees shall, whenever possible, utilize IPS's hotel sales tax exemption certificate to save on hotel taxes when booking and/or checking out.

Sec. 9. MEALS.

- Sec. 9.1. IPS shall reimburse Officers and employees the actual cost incurred for meals while traveling on official IPS business not to exceed the maximum daily meal per diem for the duty point promulgated by the GSA. IPS shall only reimburse meal expenses pertaining to travel requiring an overnight stay or for non-local travel. IPS shall observe the meals breakdown promulgated by the GSA. See Sec. 14 of this policy.
- Sec. 9.2. The CFO or designee shall adjust the daily per diem rate in the event that a business trip begins or ends in the middle of the day or if meals are to be provided at the duty point). If the Officer or employee travels to multiple duty points having different maximum meal per diem rates, the CFO shall ensure that the correct rate is applied to each day and duty point. For the first and last calendar day of travel, IPS shall observe the maximum per diem rate for the first and last day of travel promulgated by the GSA for duty point to or from which the Officer or employee traveled.

Sec. 10. INCIDENTAL EXPENSE ALLOWANCE.

IPS shall not provide a per diem for incidental expenses. IPS may reimburse an Officer or employee for the incidental expenses only if the Officer or employee provides an original, itemized third-party receipts for any incidental expenses.

Sec. 11. ALTERNATIVE TRAVEL ARRANGEMENTS.

Sec. 11.1. Combined Business and Personal Travel

Sec. 11.1.1. Unless a reasonable written justification is provided and approved by the CFO or designee, Officers and employees must depart and return from business trips in a timely manner (i.e., travel to the duty point on the same day that business is to be conducted and return on the same day that business is concluded).

Sec. 11.1.2. Officers and employees should not conduct business and personal travel on the same dates. If personal travel is undertaken on the same dates as official business, the Officer or employee shall obtain the CEO's prior, written approval. Any additional cost incurred as a result of undertaking personal travel, including increased airfare, ground transportation, lodging and meal costs, is a personal cost that shall be paid by the employee. To mitigate IPS's use of organizational funds on personal travel costs, IPS shall suspend the use of meal per diems by the Officer or employee and instead require original, itemized third-party meal receipts.

Sec. 11.1.3. Officers and employees shall not charge any personal expenses to IPS's corporate card accounts or any other account. If such occurs, the Officer or employee shall reimburse any expenses pertaining to personal travel charged to IPS, including personal travel expenses paid using assigned corporate charge or credit accounts. If the Officer or employee fails to reimburse said expenses, IPS shall report the amount outstanding as taxable income on the Officer or employee's Form W-2. Additionally, the CFO shall report the employee's failure to reimburse the invoiced amount to the Board.

Refer to Accountable Plan Policy (Finance Policy 1.1) for additional local requirements.

Sec. 11.2. Fly-By (adding a personal destination).

Sec. 11.2.1. Officers and employees must make travel arrangements that result in direct travel to and from the duty point. If an Officer or employee makes travel arrangements that result in a personal side trip(s), or "fly-by," IPS shall only reimburse the Officer or employee the airfare for direct travel to and from the duty point. The Officer or employee shall pay any additional cost related to the fly-by.

Sec. 11.2.2. At the time that a fly-by is planned, the Officer or employee shall obtain the CFO's prior written approval. Subsequently, the Officer or employee shall document the cost for (1) the business travel and (2) the fly-by through the preparation of a travel itinerary that includes both the business and personal segments of the trip in order to avoid the appearance of impropriety. IPS will not reimburse an Officer or employee for travel expenses disclosed on separate itineraries. For the dates that the Officer or employee is on personal travel, IPS shall suspend and not reimburse any per diem or other amounts for ground transportation, lodging and meals. Officers and employees shall provide airfare cost comparisons, obtained at the time that the airline travel is booked, as documentation for the travel reimbursement.

Sec. 11.3. Foreign Travel.

Sec. 11.3.1. Foreign travel is defined as any travel to and from destinations outside the United States. The duty point at which business is conducted while on travel status is the deciding factor in classifying a trip as domestic or foreign.

Sec. 11.3.2. Due to the unusual nature requiring foreign travel, Officers and employees shall provide a strong, documented business justification. The CEO shall approve all foreign travel in advance and shall notify the Board of said approvals. The Board shall approve all foreign travel by the CEO.

Sec. 11.3.3. The CEO approval of foreign travel and the Board's approval of the CEO's foreign travel shall be included with any reimbursement request and IPS corporate card transaction. IPS

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will reimburse an Officer or employee for foreign travel expenses in a manner consistent with Sec. 7 through 12 of this policy.

Sec. 11.3.4. Purchase of insurance for rental cars is required in certain countries (i.e., Mexico). Personal liability insurance may also be required. When claiming foreign travel expenses, a copy of the agenda, a letter of invitation or another form of documentation that shows the dates the business was conducted on the trip must be submitted. Expenses should be reported in U.S. dollars.

Sec. 12. TRAVEL EXPENSES TO BE REASONABLE, NECESSARY AND DOCUMENTED.

In general, IPS shall reimburse Officers and employees for all reasonable and necessary business travel expenses incurred while conducting IPS business provided that the travel expenses are properly documented and within the guidelines established herein.

Sec. 13. MAXIMUM ALLOWABLE TRAVEL COSTS.

Sec. 13.1. Without exception, Officers and employees shall adhere to and shall not exceed the maximum per diem rates promulgated by the GSA.

Sec. 13.2. In the event that an Officer or employee requires lodging accommodations at a rate exceeding the GSA's maximum per diem rates, the officer or employee may incur the incremental cost provided that it is not more than twenty percent (20%) without written approval of the variance. The Officer or employee shall document, in sufficient detail, the business reason for incurring the additional cost.

Sec. 13.3. If the maximum per diem rate plus twenty percent (20%) is inadequate for the lodging accommodations needed to undertake business travel, the Officer or employee shall submit a written request to the CFO before incurring a travel expense exceeding the threshold established Sec. 13.2. If the Officer or employee fails to obtain prior approval, the incremental cost above the threshold established under this subsection shall be the Officer's or employee's personal financial responsibility, and IPS shall not reimburse or otherwise pay for the incremental cost.

Sec. 14. PER DIEM ADVANCE.

The CFO or designee may pay the maximum per diem rate under this policy to an Officer or employee in advance. The variance threshold promulgated under Sec. 13 of this policy does not apply to per diem amounts disbursed to an employee under this section. Importantly, if an Officer or employee incurs an actual cost above the maximum per diem rate, IPS shall not, without exception, reimburse the additional cost above the per diem rate if the Officer or employee received and accepted a per diem advance. IPS's issuance of a per diem advance shall be conditioned upon the Officer's or employee's agreement to pay for any such additional costs.

Sec. 15. REQUIRED BUSINESS PURPOSE AND COST EFFECTIVENESS.

An Officer or employee traveling on IPS business is responsible for ensuring that the travel pertains to the efficient and effective operation of IPS, and for utilizing the most cost-effective means of conducting a travel related activity.

Sec. 16. REQUEST FOR REIMBURSEMENT OF TRAVEL EXPENSES.

Sec. 16.1. Preparation of Request for Reimbursement.

Officers and employees returning from travel must submit a request for reimbursement of travel expenses and original, itemized receipts, except as otherwise provided below, to the CFO or designee within 10 business days after his or her return.

Sec. 16.2. Content of Request for Reimbursement of Travel Expenses.

Officers and employees returning from travel shall prepare a Request for Reimbursement of Travel Expenses form that includes the following information:

- (a) The Officer or employee's full, legal name;
- (b) The travel destination and dates of travel;
- (c) The actual amounts expended by the Officer or employee for lodging, meals, mileage for personal vehicle driven, parking, transportation, and other travel-related expenses;
- (d) A notation indicating if the Officer or employee received a travel advance, the amount of the travel advance, and the amount of the travel advance remaining or travel expenses incurred over the travel advance;
- (e) A statement certifying that the expenses reported and requested on the form are true, correct, and unpaid;
- (f) A statement certifying that the supporting documents attached to the form are original, unaltered third-party receipts or records; and
- (g) The Officer or employee's signature and date of signature.

Sec. 16.3. Required Supporting Documentation.

An Officer or employee requesting to be reimbursed for travel-related expenses shall attach to and submit with the Request for Reimbursement of Travel Expenses an original of the following documents issued by the vendor:

- (a) Airline travel itinerary indicating the total cost of airfare sufficient to ascertain the identity of persons traveling, point of origin and destination and return, and any additional services and/or fees charged by the airline;
- (b) Hotel billing statement indicating that the total cost of lodging was paid and sufficiently detailed to demonstrate that only the cost of lodging, including taxes, was paid and that the lodging pertained to the period of travel originally requested;
- (c) Rental car receipt or statement identifying the Officer or employee renting the vehicle, establishing that the rental period pertained to the period of business-related travel, disclosing the rental rate and other fees charged, and demonstrating that the total cost of the rental was paid;
- (d) Itemized retail receipts for gasoline for the rental car, airport or other parking, toll road fees, fees for business-related long-distance calls (explanatory statement required), taxi service, and other allowed incidental travel related expenses; and
- (e) www.mapquest.com mileage or other similar web-service printout or actual odometer reading indicating the number of miles traveled.

Sec. 16.4. Electronic Record.

Officials and employees shall submit an original electronic record, as provided by the vendor or in accordance with administrative procedure.

Sec. 16.5. Review by CFO.

Upon receiving the Officer or employee's request for reimbursement of travel expenses and attached supporting documentation, the CFO or designee shall review and approve or disapprove an Officer or employee's request for reimbursement and issue a final determination of amounts due to the Officer or employee for reimbursement. In making their determination, the CFO or designee must ensure that the travel expenses are reasonable and necessary and comply with this policy.

Sec. 16.6. Review by Board.

Without exception, the Board shall review and approve a request for the reimbursement of travel expenses submitted by an Officer identified in Sec. 5 of the Controlling Policy.

Sec. 17. ALLOWABLE COSTS.

Sec. 17.1. General Rule.

Reimbursement rates shall be generally those established by the GSA or IRS. Any departure from this general rule must be supported by a written statement and/or other evidence submitted by the Officer or employee and approved by the CFO or designee.

Sec. 17.2. Eligible Travel Expenses.

An eligible travel expense is a cost that is reasonable and necessary for the conduct of travel pertaining to an IPS function, program, or activity and that conforms to the Prudent Person Rule under Sec. 7 of the Controlling Policy. Eligible Travel Expenses include, but are not limited to:

- (a) Common carrier fares including the cost of transportation via airplane, bus, taxi, and train for coach or regular passenger seating;
- (b) Additional fees charged by common, commercial airlines for checked luggage and preferred seating within coach or cabin-class;
- (c) Reasonable fees for changes in flight or stand-by arising from a change in travel requirements (e.g., a business meeting ends significantly earlier or later than the date and/or time disclosed on the meeting agenda);
- (d) For travelers with a disability, common, commercial airfare for upgrades to the most economical seating, as set forth in Sec. 7.3 of this policy;
- (e) For Officers or employees who travel at least twice a month to conduct official IPS business, reasonable fees for participation in the U.S. Department of Homeland Security, Transportation Security Administration PreCheckTM program;
- (f) Hotel lodging up to the maximum amount allowed pursuant to the guidelines published by the GSA;
- (g) Hotel occupancy taxes;
- (h) Rental car cost;

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- (i) Mileage per diem up to the maximum amount allowed pursuant to the guidelines published by the IRS and based upon the mileage calculated using MapQuest or similar mapping application or actual odometer readings;
- (j) Meals up to the maximum amount allowed pursuant to the guidelines published by the GSA; and
- (k) Incidental costs for which an original receipt is provided, such as the cost of gasoline for a rental car and fees for parking, toll roads, internet service used for IPS business, and business-related long-distance calls.

Sec. 17.3. Ineligible Travel Expenses.

A cost is NOT an eligible travel expense if it is NOT allowed by this policy and is NOT reasonable and necessary for the conduct of travel pertaining to an IPS function, program, or activity. Although not all-inclusive, the following expenses are considered ineligible for reimbursement:

- (a) Alcoholic beverages;
- (b) Business or first-class seating (i.e., cabin upgrades);
- (c) Entertainment of any kind including, but not limited to, sporting or music venues;
- (d) Fines, including, but not limited to, fines assessed for parking or moving violations;
- (e) Gratuities;
- (f) Membership fees;
- (g) Mileage for commuting between an Officer or employee's private residence and place of employment;
- (h) Personal travel costs, including personal travel that is coordinated with, or piggybacks, with official IPS business travel;
- (i) Reading materials (e.g., magazines, newspapers, etc.), in whatever form (e.g., hard copy, paperback or Kindle);
- (j) Room service, laundry, personal phone calls, Internet service for personal use, inroom movies, etc.;
- (k) Toiletries;
- (1) Travel insurance;
- (m) Travel for spouses, family members, an Officer or employee's companion(s), the Officer or employee's children, non-IPS employees, or other related guests; and
- (n) Valet services.

Sec. 18. TRAINING AND UPDATES.

The Chief Financial Officer ("CFO") or designee shall properly train or ensure training is provided to IPS Officers and employees on the requirements of this policy and any administrative procedures adopted to implement this policy. Additionally, the CFO or designee shall keep IPS Officers and employees informed of any changes to this policy and related requirements.

Sec. 19. <u>ADMINISTRATIVE PROCEDURES</u>.

The CEO and/or CFO shall formally adopt administrative procedures as reasonably necessary to properly administer this policy and to adhere to applicable law and rule. In doing so, the CEO and/or CFO shall not adopt, and are prohibited from adopting, an administrative procedure that conflicts with applicable law or this policy. Accordingly, the CEO and/or CFO shall confer with

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the Board or legal counsel before deviating from the requirements set forth in this policy. In the event that a deviation from this policy becomes necessary, the CEO and/or CFO shall either recommend an amendment to this policy or the Board's approval of a specific deviation, including the purpose, scope and duration of the requested deviation.

Sec. 20. <u>Date Adopted and Effective</u>.

As set forth in the pertinent minutes to the meeting of the Board, the Board adopted this policy on September 17, 2021, and it became effective on September 17, 2021.

Sec. 21. <u>RETENTION</u>.

This policy shall be retained until superseded, expired or discontinued and for five years thereafter.

Sec. 22. CERTIFICATION.

The Undersigned, being the Secretary of IPS, hereby certifies that the foregoing represents a true copy of the Board Policy relating to Travel, as originally adopted by the Board on January 15, 2021, and subsequently amended by the Board on September 17, 2021, which Policy, is in full force and effect and has not been revoked or amended.

Ryan Vaughan, Secretary	
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Date	