



SMART TALKS



Effectively Managing T&E Operations – IRS Regs and Tax Implications



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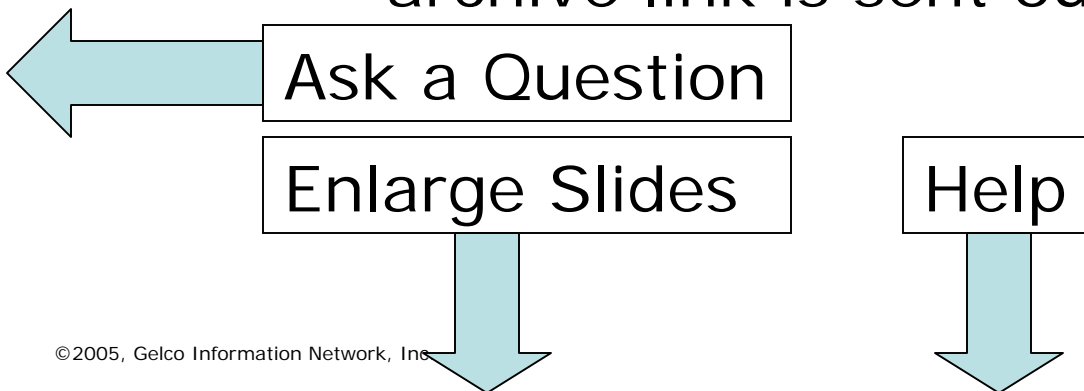
August 24, 2005





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- Submit your question at any time during the presentation. This will give the host or presenter plenty of time to read and respond to your question.
- Other participants will not see you questions.
- Any questions not addressed during the event will be responded to when the archive link is sent out.





Jaye Calhoun

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Jaye Calhoun, Tax Attorney, a member of the New Orleans office of McGlinchey Stafford. Her practice focuses on state and local taxation, estate planning and administration, business planning and formation and tax audits and tax litigation. She currently serves as Chair of the Louisiana State Bar Association Section on Taxation and Co-Chair of the New Orleans Bar Association Tax Law Committee. She is Board Certified in Tax and Estate Planning and Administration by the Louisiana Board of Legal Specialization, and is a former attorney for the Internal Revenue Service.

Jaye has co-authored two books and has written numerous articles on recent developments in taxation. Jaye is an adjunct professor at Loyola Law School where she teaches a course in state and local taxation.

Jaye received her LL.M. from Georgetown Law Center in 1997 (with distinction), her J.D. from Tulane University School of Law in 1991 (cum laude), and her B.S. from Newcomb College of Tulane University in 1987 (cum laude).



Webcast Poll

Does your employer require employees who have company cell phones to account for personal usage of the phones?

- Yes
- No



IRS Circular 230 Disclosure

- This presentation (including any attachments) does not constitute tax advice and may not be used by any taxpayer for the purpose of avoiding penalties imposed by the Internal Revenue Code or other law or for the purpose of marketing or recommending to any other party any transaction, arrangement or other matter. This information was not written to support the promoting, marketing or recommending of any transaction or matter. The taxpayer should seek tax advice based on the taxpayer's own circumstances from an independent tax advisor.



Tax Treatment of Business Expenses

The tax treatment of business expenses paid by an employee will depend on whether the employer's reimbursement or expense allowance arrangement is an accountable or nonaccountable plan.

- Accountable Plans - Expenses that are reimbursed under an accountable plan are not reported as income on an employee's Form W-2 and will not show up on the employee's tax returns. Reg. § 1.62.2(c)(4).
 - The percentage limit on deductions for meals and entertainment applies to the employer.
- Nonaccountable Plans - Amounts paid under a nonaccountable plan must be included in the employee's income (Reg. § 1.62-2 (c) (5)).
- Combo Treatment – Substantiated deductible business expenses exceeding amounts considered paid by an accountable plan may be deductible by the employee as miscellaneous itemized deductions (subject to the 2% of AGI floor and the 50% limit for meals and entertainment). Code Sec. 62; Reg. §1.62-1 (e).



Accountable v. Nonaccountable Plans

- **Requirements for an accountable plan**
 - there must be a business connection for the expenses
 - the employee must substantiate (actual or deemed) the expenses; and
 - any excess reimbursement or allowance must be returned to the employer (plan must require return). Reg. § 1.62-2 (c).
 - Any allowance must be reasonably calculated not to exceed anticipated expenses
- A plan that would be considered partly accountable and partly nonaccountable if the two parts were considered separately will be treated as two separate arrangements: one accountable and the other nonaccountable. Reg. § 1.62-2 (c).



Accountable v. Nonaccountable Plans (continued)

- *Business Connection*
 - In general - satisfied if the expenses are incurred in connection with the performance of services as an employee
 - Advance payments - must be made reasonably close to the anticipated date when the employee will incur the expense. Reg. § 1.62.2 (f) (1).



Accountable v. Nonaccountable Plans (continued)

- Substantiation - (accountable plans)
 - Based on type of expense
 - Travel, meals, lodging, entertainment, gifts and expenses attributable to the use of “listed property” – substantiate based on the requirements of Code Sec. 274 or may use “per diem” rules for travel away from home
 - Automobile expenses – may be substantiated pursuant to regular rules or deemed substantiated under certain circumstances
 - Other expenses – will be considered substantiated if enough information is submitted to the employer to enable the employer to identify the specific nature of the expense and to conclude that the expense was attributable to the employee’s business activities. Reg. § 1.62-2 (e) (3).



Accountable v. Nonaccountable Plans (continued)

- Return of Excess (or Unsubstantiated) Amounts
 - Must be within a reasonable period of time
 - Failure to return excess – Will be treated as paid under a nonaccountable plan and includible in the employee's income
 - Reasonable Period of Time – for substantiation or return of excess amounts depends on facts and circumstances
 - 2 safe harbors – Reg. § 1.62-2 (g)
 - the fixed date method
 - the periodic statement method



Accountable v. Nonaccountable Plans (continued)

- The fixed date method -
 - advance payments – must be made no more than 30 days before reasonably anticipated expenses are paid or incurred;
 - substantiation – must be turned in no later than 60 days after the expenses are paid or incurred; and
 - return of excess amounts – must be returned no later than 120 days after expenses are paid or incurred.



Accountable v. Nonaccountable Plans (continued)

- The periodic statement method – the employer must:
 - give an employee a periodic statements (at least quarterly) listing amounts paid in excess of amounts substantiated; and
 - request the return or substantiation of the excess amounts within 120 days of the issuance of the statement.



SMART TALKS



IRS Rules for Substantiation of Trade or Business Expenses





Deductibility, In General

- A taxpayer may deduct from gross income the ordinary and necessary expenses of carrying on a trade or business that are paid or incurred in the taxable year. Code § 162 and Reg. § 1.162-1. This is a “facts and circumstances” determination.
- necessary - an expense that facilitates, or is helpful to, the taxpayer’s business
- ordinary - an expense that is commonly associated with the taxpayer’s type of business and accepted in, and appropriate to, that industry.



Entertainment, Meal and Gift Expenses

- These business expenses are not always deductible in full. They are limited by Code § 274 and other areas of the Code.
 - Generally, only 50% of meal and entertainment expenses are deductible under Code Sec. 274 (n) but there are exceptions.
 - Business gifts are generally limited to \$25 in value with some modifications.



Entertainment Expense

To be deductible it must be:

- *directly related* to the active conduct of a trade or business or
- *associated with* the active conduct of a trade or business if the expense is for entertainment directly before or after a substantial and bona fide business discussion.



Entertainment Expense (continued)

- Deductible “entertainment” includes
 - expenses for night clubs, sporting events, theaters, and other activities determined in light of the taxpayer’s trade or business
 - Recreational facilities primarily for the benefit of employees. Reg. § 1.274-2 (f) (2) (v).
 - Dues for professional or public service organizations if paid for business reasons and if the organization’s primary purpose is not entertainment. Reg. § 1.274-2 (b).
- Does not generally include
 - expenses for yachts, hunting lodges, swimming pools, tennis courts, or bowling alleys. Code Sec. 274 (a) (1) (B).
 - Club dues for business, social, athletic, luncheon, sporting, airline and hotel clubs. Code Sec. 274 (a) (3).



Directly Related Test

- An expense is *directly related*, under the regs, if:
 - the taxpayer has more than a general expectation of deriving income, or some other specific business benefit, at some indefinite future time.
 - the taxpayer must engage in the active conduct of business with the person being entertained.
 - the active conduct of business must be the principal aspect of the combined business and entertainment. Reg. § 1.274-2 (c).



“Associated” Entertainment

- A deductible entertainment expense “associated with the active conduct of a trade or business” is one incurred for entertainment directly preceding or following a bona fide and substantial business discussion.
 - May include good will expenditures to obtain new business or to encourage the continuation of existing business relationships.
 - The business discussion must be the principal aspect of the combined entertainment and business and must represent an active effort by the taxpayer to obtain income or other specific business benefit. Reg. § 1.274-2(d).



Entertainment-Related Meals

- In general - entertainment-related meals are *not* deductible unless:
 - they meet either the “directly related” test; or,
 - if the meal directly precedes or follows a substantial and bona fide business discussion (including a business meeting at a convention), it is associated with the active conduct of a trade or business; and,
 - the expense is substantiated.

Code Sec. 274 (d); Temp. Reg. § 1.274-5T (c), (f).



Entertainment-Related Meals

- There are two additional restrictions on the deduction of meal expenses:
 - an employee of the taxpayer must be present; and,
 - the expense is only deductible to the extent it is not lavish or extravagant under the circumstances (with certain exceptions).



Specific Exceptions

Code contains exceptions to general rule of nondeductibility of entertainment expense:

- Food and beverages for employees furnished on premises (and related facilities) - *[subject to 50% limitation]*
- Recreational expenses primarily for employees who are not “highly compensated employees” within the meaning of Sec. 414 (q).
- Goods, services, and facilities that are furnished to non employees as entertainment , amusement or recreation expenses and that are includible in the recipients’ incomes



Specific Exceptions

- Expenses of employees', stockholders', agents' or directors' *business* meetings [*subject to 50% limitation*]
- Expenses directly related and necessary to attendance at a business meeting of a tax-exempt business league, including a real estate board, chamber of commerce or board of trade [*subject to 50% limitation*]
- Costs of goods, services and facilities made available to the public
- Entertainment sold to customers in a bona fide transaction for adequate consideration



Specific Exceptions

- Reimbursed expenses, but only
 - if services, for which reimbursement is made are performed for an employer and the employer has not treated the expenses as wages subject to withholding or
 - when the services are performed for a person other than an employer and the taxpayer receiving the reimbursed expenses accounts to such person



Specific Exceptions

- Services, goods, and facilities treated as compensation and as wages for withholding tax purposes
 - This exception has been modified by the American Jobs Creation Act of 2004 which limits the deduction to the amount treated as compensation paid to specified employees and as wages subject to withholding. Code Sec. 274 (e) (2) (A).
 - Sutherland Lumber-Southwest, Inc., 114 T.C. 197, *aff'd*, 255 F.3d 495 (8th Cir. 2001); *acq.*, AOD 2002-02.



50% Limitation Rule

The deduction for meal and entertainment expenses is generally limited to 50% of the allowable expense under Code Sec. 274 (n)

- Allowable expense
 - food and beverage expenses incurred in the course of travel “away from home” to the extent such expense is not “lavish an extravagant” and including tax and tips
 - entertainment expense including room rental and parking fees
- Not included – (not reduced by 50%) - related transportation costs
- Exceptions apply – including de minimis fringe meals, certain sporting event tickets and employee relocation meals.



Business Gifts

- Deductions for business gifts are limited to
 - In general - \$25 per recipient per year
 - Items clearly of an advertising nature costing \$4 or less – in full
 - Signs, display racks, or other promotional materials given for use on business premises are not considered gifts

Code § 274 (b) (1) and Reg. § 1.274-3.



Transportation and Car Expenses



Local Transportation Expenses

- Local transportation expenses – may include business use of car and travel by rail, bus, or taxi.
 - Business - may deduct ordinary and necessary local transportation expenses. Reg. § 1.162-1 (a).
 - Employee - depends on whether the employee is reimbursed under an accountable plan or nonaccountable plan.



Local Transportation Expenses

- **Commuting Expenses** – generally not deductible
 - **Exceptions**
 - **Extra job-related travel for employer's benefit** - travel exceeding ordinary commute undertaken for the purpose of transporting job-related tools and materials.
 - **Multiple work locations** - An individual who works at two or more different places in a day may deduct the costs if getting from one place to the other.
 - **Temporary work location** - If a taxpayer has at least one regular place of business away from home, the daily commute to a *temporary* work location in the same trade or business are deductible. Rev. Rul. 99-7.



Local Transportation Expenses

- **“Temporary Work Location”** -The “temporary” nature of the work is measured by a rebuttable presumption based on a one year rule. If the temporary work location is realistically expected to last (and does in fact last) for one year or less, the employment is temporary. Facts and circumstances to the contrary may rebut this presumption.
 - The work location will not be considered temporary (even if it lasts for more than a year) if there is no realistic expectation that the work will not last less than a year at the time it is undertaken.
 - If circumstances change (it becomes clear after it is undertaken that the job will last longer than a year), the work location will no longer be treated as temporary from that date forward.



Car Expenses

- **Car must be used in employer's trade or business**
 - **May include** – expenses for gasoline, oil, tires, repairs, insurance, depreciation, parking fees, tolls, licenses, and garage rentals
 - **Does not include** - Interest paid on the employee's personal car loan
 - **Business v. personal use** - Must allocate between business use and personal use



Substantiation of Car Expenses

- **Actual expense method** – Actual expenses may be substantiated with an exact record of the amount paid for gasoline, insurance, and other costs.
- **Standard mileage method** – The employee multiplies business mileage by the “standard mileage rate,” published by the IRS. For 2004, this rate was 37.5 cents a mile. Rev. Proc. 2003-76. It is 40.5 cents a mile for 2005. Rev. Proc. 2004-64.
 - **Parking fees and tolls** - The business portion of parking fees and tolls may be deducted in addition to the standard mileage rate.



Substantiation of Car Expenses

- **Fixed and Variable Rate (FAVR) Method**
 - This method permits an employer to provide a mileage allowance to no less than five employees (the majority of whom cannot be management employees) during any calendar year. The car expenses of the covered employees will be deemed substantiated if:
 - the payor reimburses expenses with a mileage allowance based on a flat rate or on a schedule combining periodic fixed and variable payments.
 - Additional requirements are listed in Rev. Proc. 2004-64.



Traveling Expenses

- A business may deduct expenses incurred for ordinary and necessary employee travel incurred while the employee is away from home in the conduct of the employer's trade or business. Code Sec. 162 (a) (2); Reg. § 1.162-2.
 - **"Away"** - out of the general area of the employee's "tax home" for a period substantially longer than an ordinary workday and/or if it is reasonable for the employee to need to sleep or rest. The period can be less than 24 hours if it is reasonable for the employee to need to sleep or rest within the period.



“Home” Defined

- A **“tax home”** is:
 - the area of the employee’s regular or principal (If there is more than one regular) place of business; or,
 - if the employee has regular or principal place of business because of the nature of the work, the taxpayer’s regular place of abode in a real and substantial sense.

- A **tax turtle** is:
 - an itinerant employee (that is, an employee whose home is located wherever the employee is working). This type of employee will not incur deductible travel expenses.



“Home” Defined (continued)

- **Multiple places of business** – If an employee works in multiple locations, the employee’s principal work location may be treated as the employee’s tax home.
- **Principal place of business** – This is determined on the basis of:
 - the total work time spent in each area;
 - the amount of work done in each area;
 - the amount of financial return in each area.



Temporary v. Indefinite Test

- “Away from home”
 - Look to:
 - the **nature** of the stay
 - the **length of time** away from the employee’s principal place of business
 - **temporary stay** – (deductible) reasonably anticipated to last less than one year
 - **indefinite stay** – (not deductible) the work is reasonably anticipated to last longer than one year (whether or not the work actually lasts longer than a year) the work location is considered the employee’s tax home. Rev. Rul. 93-86.



Deductible Travel Expenses

- If incurred by an employee traveling away from the employee's tax home, may include:
 - travel, meals, and lodging; transportation, a reasonable amount of baggage
 - meals and lodging deductions are limited to those that are not lavish or extravagant under the circumstances under Code Sec. 162 (a) (2).
 - necessary samples and display materials, hotel rooms, sample rooms, telephone and fax services, and public stenographers'
 - automobile expenses including gasoline, oil, tires, parking fees, tolls, and depreciation
 - Doesn't generally include expenses for family members



Code Sec. 274 Substantiation Requirements

- Special rules apply to prove the fact that expenses for travel, meals, lodging, entertainment, business gifts and expenses in connection with “listed property” (cars, computers, etc.) were paid or incurred
 - The documentation must show
 - amount
 - time and place, and
 - business purpose
 - In addition, for entertainment and gift expenses –
 - must show the business relationship of the person being entertained or receiving the gift.
- Temp. Reg. § 1.274-5T (a)-(c).



Code Sec. 274 Substantiation Requirements (continued)

- **Accountable Plan Substantiation Requirements**
 - **Actual substantiation of expenses** - the employee must provide an adequate accounting of expenses incurred in the form of adequate records. Temp. Reg. § 1.274-5T (f) (4) or
 - **Per diem method** – permitted as an alternative



Code Sec. 274 Substantiation Requirements (continued)

- **Actual Substantiation with Adequate Records**
 - **Contemporaneous** – either a contemporaneous log or a record of the elements of the expense or use of the listed property made at or near the time of the expenditure or use
 - **Documentary evidence** – must support expense. Sufficient evidence may include receipts or paid bills
 - **Expenses under \$75** – documentary evidence advisable but not required
 - **Lodging expense** – documentary evidence always required. Temp. Reg. §1.274-5T(c) (2) (iii).
 - **Best practices** – Employer may require that the employee keep a contemporaneous account book, expense diary or log, or similar record



Code Sec. 274 Substantiation Requirements (continued)

- Per Diem Method of Substantiation
 - The *amount* of away-from-home meals and lodging expenses will be deemed substantiated
 - The time, place and business purpose of the travel must be still be substantiated by adequate records or other evidence
 - The method may be used only in connection with an accountable plan



Code Sec. 274 Substantiation Requirements (continued)

- Per diem allowance
 - A per diem allowance may be deemed substantiated for reimbursed expenses under an accountable plan only if:
 - the employer reasonably believes the employee will incur ordinary and necessary expenses for lodging, meals and incidentals while traveling away from home in connection with the performance of services as an employee
 - the allowance is reasonably calculated not to exceed the amount of the expense or the anticipated expense; and,
 - the allowance is paid at the applicable federal per diem rate, a flat rate or pursuant to a stated schedule



Code Sec. 274 Substantiation Requirements (continued)

- Types of Per Diem Allowances
 - meals and incidental expenses only (M&IE); or
 - lodging plus M&IE
 - **incidental expenses** – (for travel after October 1, 2004) – defined in Federal Travel Regulations, 41 C.F.R. 30003.1 (2004); Rev. Proc. 2004-60, § 3.02 (3),
 - **Excess reimbursement** - If reimbursement exceeds federal rates, the employee must include the excess in gross income and it is treated as paid under a non accountable plan (reportable as income to the employee and subject to withholding)



Lodging Plus Meals and Incidental Expenses Per Diem

- **Amount of reimbursed expense deemed substantiated** - equal to the lesser of the per diem allowance or the amount computed at the federal per diem rate for the locality of travel for the period in which the employee is away from home. Rev. Proc. 2004-60; Rev. Proc. 2003-80. Lodging receipts are not required.
- **Unreimbursed M&IE** – May use applicable federal M&IE rate but must substantiate lodging costs
- Special rules exist for transportation workers, foreign travel, conventions and travel on cruise ships.



Per Diem Rates

- Federal travel rate is based on locality
 - **Locality of travel** - where the employee (who is traveling on business away from home) stops to sleep or rest.
 - **Rate tables** – Rates are published in the FTR for various geographic areas within the continental United States (the 48 contiguous states plus the District of Columbia, also known by its acronym: CONUS). Rates also exist for AK, HI and PR (OCONUS) and for foreign travel. Transitional rules apply at the end of the year. See Rev. Proc. 2004-60; Rev. Proc. 2003-80.
 - **How computed** - the federal per diem rate for a given locality is equal to the sum of maximum lodging amount and the M&IE rate for that locality.



Per Diem Rates (continued)

- **High-Low Method**
 - a simplified method for determining a lodging plus M&IE per diem to compute allowances
 - Divides all CONUS localities into low-cost or high-cost localities.
 - Some areas may be “high-cost” for only part of the year (ski resorts in winter; the beach in summer).
 - If used for an employee, can’t use actual federal maximum per diem rates for the calendar year (except for travel outside of CONUS).



For Travel on or after October 1, 2004 under Rev. Proc. 2004-60 - per diem rates for lodging expenses and M&IE for high-cost and low-cost localities

	Lodging expense rate	M&IE rate	Maximum per diem rate
High-cost localities	\$153	\$46	\$199
Low-cost localities	\$91	\$36	\$127



For Travel on or after November 1, 2003 – under Rev. Proc. 2003-80 - per diem rates for lodging expenses and M&IE for high-cost and low-cost localities

	Lodging expense rate	M&IE rate	Maximum per diem rate
High-cost localities	\$161	\$46	\$207
Low-costs localities	\$90	\$36	\$126



Meals and Incidental Expense Only Per Diem Allowances

- If M&IE is substantiated using a per diem allowance - subject to the 50% limitation on meal and entertainment expenses
- Must prorate M&IE rate for partial days of travel away from home.
- If the employer does not reimburse an employee's expenses, the employee may use the M&IE rate but must keep records to prove the time, place and business purpose of the travel. Rev. Proc. 2004-60; Rev. Proc. 2003-80.
- Lodging costs still require a receipt.



Meals and Incidental Expense Only Per Diem Allowances

- **Optional method for Incidental Expenses Only Deduction** – Eff. for travel on or after 10/1/04 – deduct \$3 per calendar day (or partial day) for travel to any CONUS or OCONUS locality.
 - **Prorate** as needed
 - **Substantiate** – subject to requirements of per diem method of substantiation.
 - **May not be used if using**
 - lodging plus meal and incidental expenses per diem method
 - M&IE per diem method
 - M&IE only method
 - high-low method
 - M&IE only

Rev. Proc. 2004-60



IRS Rules and Guidance

Automated Expense Processing

- PLR 200433010
- PLR 200417022
- PLR 200304002
- PLR 200235006
- Rev. Rul. 2003-106
- Rev. Proc. 98-25
- Rev. Proc. 97-22



IRS Rules and Guidance (continued)

- The arrangement must generally satisfy the accountable plan requirements:
 - Advances, allowances or reimbursements must only be provided for deductible expenses
 - Must require paper back-up where electronic information is insufficient
 - The system must supply information to the employer sufficient to determine that the expenses being reimbursed are exclusively business and which business expenses are not deductible
 - Cards should only be supplied to those individuals likely to incur business expenses



IRS Rules and Guidance (continued)

- Electronic information meets the substantiation requirements if:
 - it identifies the necessary elements
 - If not, back-up is required for those expenses over \$75
- Requires return of excess and doesn't reimburse unsubstantiated expenses



IRS Rules-Record Retention

- IRS Rules – **26 CFR**
 - **1.6001-1** - general
 - **1.57-5(b)** – net operating losses
 - **1.162-17** – persons paying travel or other business expenses incurred by an employee in connection with the performance of services
 - to maintain adequate and detailed records of ordinary and necessary travel, transportation, entertainment and similar business expenses including identification of amount and nature of expenditures, and to keep supporting documents especially in connection with large or exceptional expenditures.



IRS Rules-Record Retention

(continued)

- **1.67(a)-7 and 1.67(a)-11** – depreciation of business property
- **1.274-5** – taxpayer substantiation of expenses for travel, entertainment and gifts related to the active conduct of a trade or business
 - A taxpayer must substantiate each element of an expenditure by adequate records or sufficient evidence corroborating his own statements
 - A taxpayer must be able to substantiate by adequate records or sufficient evidence corroborating his own statements the business use of certain depreciable property used for travel or entertainment or the business use certain computers for any taxable year during which there may be a recapture of excess depreciation claimed.



SMART TALKS



Submit Your Questions for Ms. Calhoun



Submit a Question





Jeff Cronin

Vice President – Solutions Marketing Gelco Expense Management

Jeff Cronin is the Vice President of Solutions Marketing for Gelco Expense Management where he is responsible for the identification of travel expense management issues and opportunities for the industry. Mr. Cronin focuses on maximized return on investment for clients and stays abreast of all industry changes through research and client interfaces and works to improve Gelco's products and services. Mr. Cronin brings more than 10 years of travel and expense management technology and product management experience.

Prior to joining Gelco, Mr. Cronin ran the editorial department for MicroMash, a leading provider of computer-based professional education for accounting and legal professionals.

Cronin earned a Bachelor of Science degree from the University of Colorado.



Webcast Poll

What describes the status of expense automation initiatives within your organization?

- Just starting to educate myself on options
- Evaluating vendors
- No vendor, evaluating delivery model
- Have deployed a web-based automated solution



Steps to Achieving Best in Class

- Automate T&E process; real-time updates and reporting
- Use of corporate cards
- Migration of larger percentage of travel and meals and entertainment to expense report system
- Procure expenses centrally, however, process all centrally controlled expenses through expense report system



Steps to Achieving Best in Class

(continued)

- Integrate expense report system with general ledger
- Modify Travel Policy for expense report system and processing
- Web-based application for multiple and mobile users
- Communication; management approval, and real-time information
- Measure, justify, and maximize travel, meals, and entertainment investments
- Documentation maintained that adheres to electronic/documentation substantiation, IRS, and other requirements



Gelco Expense Management

- *Over 100 years history managing T&E process*
- *Serving mid/enterprise and government clients T&E needs in over 160 countries*
- *Leader in global expense processing*
- *Providing the most comprehensive set of services around T&E management*
 - Expense capture/filing
 - Expense process/approvals
 - Expense payments
 - Reconciliations to client financial records
 - Compliance auditing

**108,000
Transactions
per Day**

**\$20 million
processed daily**

**Processing in
35 Countries**

**97% Customer
Retention**



SMART TALKS



Question and Answer Session



Submit a Question





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