

# New York University

## UNIVERSITY POLICIES

<b>Title:</b>	Domestic and Foreign Travel Policy for Sponsored Programs
<b>Effective Date:</b>	December 1, 2017
<b>Supersedes:</b>	September 1, 2013
<b>Issuing Authority:</b>	Sponsored Programs Administration
<b>Responsible Officer:</b>	Assistant Vice President for Post-Award Administration

### Policy

It is the policy of New York University (NYU, “the University”) that the University [Business Expenses](#) policy applies to all domestic and foreign travel for sponsored programs. However, if specific sponsor guidelines for a sponsored program are more restrictive than University policy, then sponsor rules shall apply.

All travel expenses charged to Federally sponsored projects, (both direct and pass-through) are governed by the cost principles of the *Federal Office of Management and Budget Uniform Guidance* ([OMB Uniform Guidance](#)).

Therefore, charges must pass the following three tests:

- The cost must be *allowable* under both the provisions of the OMB Uniform Guidance and under the terms of a specific award.
- The cost must be *allocable*; that is, the expense can be associated to a project with a high degree of accuracy.
- The cost must be *reasonable*, that is, the cost reflects what a “prudent person” would pay in a like circumstance.

Sponsored research awards may be used to cover the costs associated with travel and subsistence associated with the award, e.g. transportation, meals and lodging. However, there are a number of factors provided below to consider for allowability and allocability of travel costs on sponsored awards.

### Purpose of this Policy

The purpose of this policy is to provide guidance for proposing and administering travel costs, both foreign and domestic, in compliance with Federal and other sponsor requirements, and NYU policy.

## Scope of this Policy

This policy is applicable to all schools, departments, units and personnel of the University involved in administering sponsored awards.

## Procedures for Implementation

All domestic and foreign travel for sponsored programs is governed by the University Business Expenses policy and, in the case of Federally sponsored foreign travel, subject to the requirements of the Fly America Act. If specific sponsor guidelines or the terms and conditions of a sponsored award are more restrictive than University policy, then the sponsor rules shall apply.

### a. Proposal /Budget

Generally, the proposal should include a budget for foreign and domestic travel costs and the proposal must have explicitly stated justification for the travel. This will translate into a budget category for travel when the sponsored project is established.

Travel is allowable as a direct cost where such travel will provide direct benefit to the project and comply with NYU and sponsor requirements. Costs for employees working on the project may include per diems or subsistence allowances and other travel-related expenses, such as mileage allowances if travel is by personal automobile.

All travel charged to sponsored projects must be approved by the Principal Investigator (PI) or their designee. Before making travel arrangements, make sure that travel is allowed under the terms of an agreement or contract. In some cases, the sponsor's written approval may be required prior to any trip. Please contact the Office of Sponsored Programs (OSP) for any travel changes exceeding the approved budget by \$1,000 or 25%, whichever is greater.

Commercial airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable except when such accommodations would:

- (i) Require circuitous routing (e.g., multiple stops or layovers);
- (ii) Require travel during unreasonable hours (e.g., "red eye flights");
- (iii) Excessively prolong travel;
- (iv) Result in additional costs that would offset the transportation savings; or
- (v) Offer accommodations not reasonably adequate for the traveler's medical needs. The non-Federal entity must justify and document these conditions on a case-by-case basis in order for the use of first-class or business-class airfare to be allowable in such cases.

## **b. Travel Advances**

When travel advances are necessary, the traveler must submit an Advance Request through the University's Accounts Payable payment system at least 10 to 20 days prior to travel.

Travel advance requests and reconciliations must follow the requirements in the [Business Expenses Policy](#).

Requests for travel advances exceeding \$500 must include a description of the circumstance that requires the advance and a brief budget of expenses must be provided in the Form.

Advances for sponsored programs must be reconciled within 60 days of the end of the trip. See the [Business Expenses Policy](#) for additional guidance. All advances must be cleared prior to closing an award.

If the advances are not cleared at the time of the award closeout, expenses associated with the remaining advance amount will be charged to a discretionary chartfield.

## **c. Domestic Travel**

*Domestic travel* is travel performed within the recipient's own country. For the U.S., it includes travel within and between any of the 50 States of the U.S. and its possessions and territories. Travel to Canada may be considered domestic travel by some Federal Agencies. Please refer to the agency's websites for guidance. When traveling domestically it's important to remember that travelers are expected to choose the lowest priced, most feasible airfare available at the time of booking (typically economy-class travel). The traveler can use a preferred airline, when available and when it satisfies the low-cost requirement. 14-day advance purchase of airline tickets is recommended.

## **d. Foreign Travel**

*Foreign travel* is travel outside of the United States, its territories and possessions. For a foreign organization foreign travel means travel outside that country. This generally means if a traveler is traveling on funds provided by the Federal government, the traveler must use a US flag carrier (an airline owned by an American company) in order to comply with the requirements of the *Fly America Act* regardless of cost or convenience.

If an employee is scheduling Federally-funded international travel, all flights where possible should be scheduled with US flag carriers or on foreign air carriers that code share with a US flag carrier. Code sharing occurs when two or more airlines "code" the same flight as if it were their own. A U.S. airline may sell a seat on the plane of a foreign air carrier. This seat is considered the same as one on a plane operated by a U.S. flag carrier. Compliance with the Fly America Act is satisfied when the U.S. flag air carrier's designator code is included next to the flight numbers on the airline ticket, boarding pass or on the documentation for an electronic ticket (passenger receipt).

*For example:* Delta has a code share agreement with Air France to Paris, France. If the boarding pass or e-ticket identifies a flight as DL ##, the requirements of the Federal Travel Regulations would be met, even if the flight was on an Air France airplane. If however, the boarding pass or e-ticket identifies the flight as an AF##, the requirements of the Federal Travel Regulations would not be met.

There are exceptions to the Act, including but not limited to instances where the use of a U.S. flag carrier would:

- a) Require circuitous routing;
- b) Require travel during unreasonable hours;
- c) Excessively prolong travel.
- d) The alternate airline is a flag carrier from a country with open skies agreement with the United States and there is no city-pair contract flight.

Exceptions must be documented by providing a snapshot of flight availability, flight times and duration. Documentation is required to show that the ticket was issued under a code-share agreement. Please refer to the [\*Fly America Act Waiver Checklist\*](#) for guidance on exceptions.

The cost in excess over the coach fare must be segregated on the employee reimbursement request submitted through the University's Accounts Payable payment system.

Any cost in excess over the coach fare will not be reimbursed from other non-sponsored funds unless approved in advance by the Dean or Senior Leader of the unit. The request for reimbursement must be accompanied by a written justification.

The U.S. Government has entered into several air transport agreements that allow Federally-funded transportation services for travel and cargo movements to use foreign air carriers under certain circumstances. Current bilateral/multilateral “Open Skies Agreements” (U.S. Government Procured Transportation) in effect include: the European Union (EU), Australia, Switzerland, and Japan.

Open Skies Agreements also provide a limited exception to the Fly America Act. Where an open skies agreement exists, a traveler may use the foreign airline except when a “GSA City Pair” exists or the travel is funded by the U.S. Department of Defense. Information on GSA City Pairs may be found at: <https://www.gsa.gov/portal/category/27075>.

When traveling to a destination serviced by a EU airline, NYU travelers flying on a Federal grant can fly on either a US carrier or an EU carrier as long as they touch down in an EU country.

Researchers are strongly encouraged to take advantage of discount fares for airline travel through advance purchase of tickets where travel schedules can be planned in advance (such as for national meetings and other scheduled events).

Faculty, staff and students working on the sponsored project are responsible for their own expenses. Individuals are personally responsible to ensure travel arrangements meet sponsored travel

regulations. Improper or inadequately supported travel claims cannot be paid and may delay the reimbursement process.

Travel costs for employees working on a sponsored project may include advances, per diems or subsistence allowances, and other travel-related expenses, such as mileage allowances if travel is by personal automobile. The following rules apply for meals, entertainment, and lodging specifically:

#### **e. Meals**

Original itemized receipts must be submitted for all meals when claiming actual expenses, as opposed to per diem. Original receipts are not required in cases where the traveler claims per diem for meal expenses. A traveler cannot claim both actual expense and per diem for meals on a single trip. Per diem rates for meals and incidental expenses are outlined as follows:

- The General Services Administration sets rates for travel within the 48 contiguous states. These rates can be found at <http://www.gsa.gov/portal/content/104877>.
- The Department of Defense sets rates for Alaska, Hawaii and U.S. Territories and Possessions. These rates can be found at <http://www.defensetravel.dod.mil/site/perdiemCalc.cfm>.
- The State Department sets rates for International Travel. These rates can be found at <http://www.state.gov/travel>.

Please note that the GSA requires travelers to prorate the meal and incidental expense allowance for the first and last day of their trip. The first and last calendar day of travel is calculated at 75 % of the locale's per diem. Additionally, in all cases, alcohol is not a reimbursable expense on an award. The cost for the meals of a non-traveler or individual not specified in the award is not reimbursable as a travel expense.

#### **f. Entertainment**

Entertainment is *not* reimbursable. Entertainment expenses include costs for meals other than the traveler, amusement, diversion or social activities. However, a meal expense is allowable and is not deemed entertainment when a bona fide business meeting discussing and/or collaborating on the research takes place. In order to be deemed a bona fide meeting, there must be an agenda and a list of attendees and their role in the project and these must be provided with the reimbursement request.

#### **g. Lodging**

##### *Domestic Travel*

Travelers will be reimbursed for the actual cost of lodging, up to \$300 plus tax per day. The Exceptions will be granted if the expense is necessary, documented and approved by the appropriate school/department representative. Conference-site hotels will be reimbursed at the actual cost. (*See Documentation Requirements below*).

### Foreign Travel

For foreign travel, NYU uses the Department of State per diem rates, listed by country. See: <http://www.state.gov/travel>.

#### **h. Documentation**

Maintain documentation for all travel expenses and include original detailed receipts for reimbursement unless electing per diem for meals. Failure to produce a receipt may result in non-reimbursement. For conferences and meetings documentation should also include:

- A copy of the conference agenda;
- A statement that specifies the nature of the business conducted and reason for travel;
- If it is a meal expense, list name of attendees, explain why the meal was necessary and explain how it directly benefited the sponsored research award;
- Hotel receipt;
- Airline boarding pass or itinerary;
- Ground Transportation details (rental car bill, receipts from taxis or limousines, ticket coupon from rail or bus required if greater than \$25).

Failure to produce a receipt may result in non-payment to the employee. Missing or inadequate documentation should follow University policy and the researcher must complete the Accounts Payable [\*Missing/Inadequate Documentation Report\*](#).

#### **i. Preferred Vendor**

When planning travel for sponsored research awards, travelers are encouraged to consult NYU Traveler for potential discounts with particular vendors to optimize financial resources and ensure proper stewardship over Federal funds. For assistance with travel arrangements, please visit NYU Traveler: <http://www.nyu.edu/nyutraveler>.

#### **j. Use of Personal Credit Card or Department Travel Card**

Employees and students who are traveling on sponsored research awards are encouraged to use a department's travel credit card, when possible, for their purchases and minimize carrying large sums of money for paying expenses. Use of personal credit cards, while discouraged, is allowed.

#### **k. Canceled trips**

In accordance with NYU's travel policy, employees and students who have purchased tickets or incurred expenses for travel on sponsored research awards and that are subsequently canceled should inquire about using the same ticket for future travel. If the travel is not postponed to a future

date, then the expenses should not be charged to the grant but rather a discretionary chartfield unless the travel has been canceled for reasons beyond the employee's control. Fees associated with changing reservations and late fees for credit cards should not be charged to sponsored projects. See the [\*Business Expenses Policy\*](#) for additional guidance.

## Policy Definitions

N/A

## Related Policies

- Business Expenses  
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/business-expenses.html>
- Expense Reimbursement  
<http://www.nyu.edu/about/policies-guidelines-compliance/policies-and-guidelines/expense-reimbursement.html>
- NYU Traveler (for assistance with travel arrangements)  
<http://www.nyu.edu/nyutraveler>

## Federal Regulations

- Federal Acquisition Regulation  
<https://www.acquisition.gov/far/index.html>
- OMB Uniform Guidance  
[http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200\\_main\\_02.tpl](http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl)
- The U.S. Department of Defense, Information on GSA City Pairs  
<https://cpsearch.fas.gsa.gov/>

## Appendices

- Accounts Payable Expense Breakdown for Travel Form (EXP 2000T)  
<https://www.nyu.edu/content/dam/nyu/financialOperationsTreas/documents/forms/exp2000T.pdf>
- Fly America Act Waiver Checklist  
<https://www.nyu.edu/content/dam/nyu/sponsoredPrgmsAdmin/documents/SPAHdbk-FlyAmericaActWaiverChecklist.pdf>