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| Policy: Travel on Sponsored Programs | Policy No: S5.5 |
| Policy Developer(s): Office of Sponsored Research | Original Date: May 18, 2018 |
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- I. **POLICY:** All costs charged to a sponsored program must comply with the sponsor’s terms and conditions, John Carroll University (“the University”) policies and procedures, and Federal regulations, including [45 CFR 75 Uniform Administrative Requirements, Cost Principles and Audit Requirements for HHS Awards](#) and [2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#). Travel costs charged to sponsored awards must be allowable, allocable, and reasonable. For Federally funded sponsored programs, they must be in accordance with Federal regulations. When there is a conflict between University policy/procedure and sponsor requirements, the more restrictive policy/procedure applies.

- II. **SCOPE:** This policy applies to all sponsored awards and must be followed by all University faculty, staff and students involved with sponsored awards and/or the processing of expenses charged to sponsored awards. These requirements apply to anyone who incurs University travel or business expenses and requests payment of costs from a sponsored funding source.

- III. **PROCEDURES:** All travel by faculty, staff, students, and guests utilizing sponsored program funds administered through the Office of Sponsored Research (OSR) must be pre-approved by OSR. Persons traveling on sponsored projects are typically appointed to the sponsored project. When this is not the case, the travel and the traveler must be justified with a business purpose description prepared with enough detail by the Principal Investigator (PI) to confirm the travel as project related and consistent with sponsor regulations.

If travel expenses are charged to a sponsored award, the documentation for such charges must justify that travel taken by the individual is necessary to the sponsored award, and explain how it benefits the project being charged. Per [45 CFR 75.474](#) and [2 CFR 200.474](#), “travel costs are the expenses for transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the non-Federal entity [John Carroll University]. Such costs may be charged on an actual cost basis, on a per diem or mileage basis in lieu of actual costs incurred, or on a combination of the two (e.g. per diem for meals and actual costs for lodging), provided the method used is applied to an entire trip and not to selected days of the trip, and results in charges consistent with those normally allowed in like circumstances in the non-Federal entity’s [John Carroll University’s] non-federally funded activities and in accordance with John Carroll University’s written travel reimbursement policies.”

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Costs incurred by employees for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable to the extent such costs do not exceed charges normally allowed by [John Carroll University's Procurement Guidelines, Section F: University Travel](#).

After the trip, the traveler must submit original receipts of incurred expenses for reimbursement from sponsored program funds. Requests for reimbursements submitted after the end date of the project may not be processed.

A. Allowable Travel for Sponsored Projects

- Consistent with agency regulations, sponsored travel has special considerations. All travel must be completed within the beginning and end dates of the sponsored program. Reimbursements to individuals will not be made prior to completion of travel.
- Travel on sponsored funds should be tied to the overall aims of the project. Per the Uniform Guidance, for federal funds, participation of the individual must be necessary to the federal award being charged and the costs must be reasonable and consistent with the non-federal entity's (the University's) established travel policy ([45 CFR 75.474](#) and [2 CFR 200.474](#)). Travel charged to sponsored funds should not be for professional development (i.e. travel to conferences that benefit the general knowledge base of the individual in their professional area of expertise but not necessarily benefiting a specific aim of a specific project).
- Personal travel must not be charged to a sponsored fund and should be separately and specifically accounted for to ensure that only the business related portions of a trip are charged to the sponsored fund.
- Alcohol is not allowable on sponsored funds.
- Foreign exchange rates must be clearly documented by including a copy of a print screen showing the average exchange rate for the period or by including a credit card statement that shows actual conversion rates. All receipts must be clearly labeled in English (i.e., hotel, rental car, taxi, food).
- Mileage, meals, incidentals and lodging charged to a federally funded sponsored program must adhere to the rates published in the [Federal Travel Regulations](#).
- Car Rental: Federally funded research requires that car rental reservations must be limited to mid-size automobiles or smaller, unless otherwise justified. Travel reimbursement requests must include the justification for rental of other than mid-size or smaller vehicles.
- Airfare: Federally funded research requires the use of U.S. Flag Air Carriers. See [Fly America Act](#) for more information. Reservations must be booked as coach or economy fare, unless it is unavailable at the time of the required travel. A memo of explanation should be attached if there is any deviation from economy fare.
- Lodging: The actual cost of overnight lodging at a commercial facility will be reimbursed if an itemized receipt is submitted with the travel request, the cost is deemed reasonable, and the travel point is further than forty-five miles from the traveler's home or primary university work site. All lodging is reimbursed at the actual/reasonable rate with submission of the original receipt.
- Meals: Per Diem allowances for meals and other incidental costs are reimbursable for in-state overnight travel or out-of-state travel that is 45 miles or more from the

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traveler's home or primary work site. Daily per diems are based upon location and on the entire 24-hour period. If a meal is served on an airplane or is included in the price of the conference registration fee, the per diem rate must be reduced based upon the provided meal. Meal receipts are not required. Note that meals, laundry, dry cleaning and any associated tips are included in the federal meal and incidentals per diem.

- **Foreign Travel:** Many sponsored programs require that foreign travel be approved or authorized in writing in advance by the sponsoring agency. In addition, some sponsored programs require that travel to certain areas be cleared through other government channels. For these and similar reasons, the Office of Sponsored Research must be consulted when foreign travel under Federal or non-Federal sponsored programs is planned.

B. Fly America Act: When making travel arrangements to a foreign country, which are to be paid by sponsored program funds (particularly those programs that are federally funded), it is required that a U.S.-based air carrier be used. This requirement applies based on the Federal guidelines provided below regardless of factors of cost, convenience, or personal preference. Be advised that the traveler, and not the travel agency, is responsible for compliance. Additional guidance can be found [at the Fly America website](#).

- 1) Use of U.S. Flag Air Carriers – The Federal Fly America Act mandates that travel sponsored by the Federal government must be on U.S. airlines or a foreign air carrier that code shares with a U.S. Flag carrier on the flight taken. This includes flights within the U.S. If there is no U.S. carrier to your destination, you must travel on a U.S. carrier as far as possible. By law, additional cost for U.S. carrier flights is not sufficient justification to fly on foreign carriers. Please note that the same rules apply to a foreign visitor's flights. If you are scheduling international travel that is federally funded, you are allowed to schedule international travel on foreign air carriers that code share with a U.S. Flag carrier. Code sharing occurs when two or more airlines "code" the same flight as if it were their own. In other words, a U.S. airline may sell a seat on the plane of a foreign airline 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 present in the area next to the flight numbers on the airline ticket, boarding pass, or on the documentation for an electronic ticket (passenger receipt).
- 2) Open Skies Agreement – The Federal Fly America Act mandates that travel sponsored by the Federal government must be on U.S. airlines. One exception to this requirement is transportation provided under a bilateral or multilateral air transport agreement called "Open Skies Agreements." There are currently four Open Skies Agreements that permit traveling on a European Union, Norwegian, Icelandic, Australian, Swiss or Japanese carrier under specific circumstances.

Though the Federal Open Skies policies allow use of foreign airlines, the easiest and safest way to comply with Federal air travel regulations is to continue to book flights only on U.S. airlines.

The use of a U.S. air carrier is required on Department of Defense awards even when there is an Open Skies Agreement in place.

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3) Generally Permitted Exceptions

- No U.S. flag air carrier provides service on a particular leg of the route. (Travelers may use foreign air carriers to or from the nearest interchange point with a U.S. Carrier).
- Use of a foreign air carrier is necessary for medical reasons (additional supporting documentation required)
- Use of foreign air carrier is required to avoid unreasonable risk to traveler's safety. (see 41 CFR 301-10.138 (b)(2) for required supporting evidence).
- Service on a foreign air carrier is 3 hours or less and the use of a U.S. flag air carrier doubles time en route.
- Air travel is between U.S. and another country and use of a U.S. carrier on a nonstop flight extends travel time by 24 hours or more.
- Use of a U.S. carrier would increase the number of aircraft changes outside of the U.S. by 2 or more.
- Use of a U.S. carrier extends travel time by 6 hours or more.
- Use of a U.S. carrier requires a connecting time of 4 hours or more at an overseas interchange point.
- Use of foreign air carrier is permissible under the Open Skies Agreement.

C. Responsibility: It is the PI's or his/her designee's responsibility to ensure that all travel expenses charged to federally primed or federal pass through awards are in compliance with this policy. For issues related to sponsored program travel, please contact the Office of Sponsored Research.

D. Sanctions: Failure to adhere to the principles and processes in this policy may result in a delay or denial of travel reimbursement, and/or other appropriate corrective action.

IV. CROSS REFERENCES:

A. [University Policies](#), including but not limited to

1. Sponsored Research Policies
2. Bank Account Reconciliation
3. [Travel Procedures](#)

B. Federal Regulations, Statement, and Mandates

1. [45 CFR 75.474](#)
2. [2 CFR 200.474](#)
3. [HHS Grants Policy Statement](#)
4. [HRSA Legislative Mandates in Grants Management for FY 2018](#)
5. [NIH Grants Policy Statement](#)
6. [NSF Proposal and Award Policies and Procedures Guide](#)

This policy will next be reviewed five years from the date of last review.