Tufts University faculty, staff and students routinely travel in support of sponsored activities. The University reimburses travelers for necessary and reasonable business expenses incurred while traveling. Reimbursable expenses must conform to university policy, federal and state law, if applicable, and the restrictions placed upon each sponsored award.

Domestic and foreign travel charged to sponsored projects should follow the guidelines set forth in this document, unless federal regulations or the funding agency imposes greater restrictions. The terms of a particular grant or contract should be referred to for specific guidance on allowable expenditures.

General Guidelines

Travel is allowable as a direct cost when such travel will provide direct benefit to the award. If federally funded, sponsored awards are subject to certain federal laws and the guidelines set forth in the OMB Uniform Guidance, 2 CFR PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS. All awards are subject to specific agency restrictions, as well as Tufts University's Travel Policy. The terms and conditions of the individual agreement should be reviewed prior to incurring and/or submitting any travel cost for reimbursement. When there is a conflict between University policy and award requirements the more restrictive policy applies.

The following list highlights some common sponsored travel restrictions.

Some awards may:

- Prohibit foreign travel
- Require pre-authorization by Sponsor for each trip
- Restrict the number of trips that can be taken
- Restrict the number of travelers on an authorized trip
- Set a maximum dollar value per trip
- Allow attendance to a conference to present research, but not for the purpose of “staying current in the field”
- Limit travel to a specific destination or purpose
- Specify maximum meal, mileage or other cost rates

Sponsored travel must be justified, well documented, in compliance with the sponsor requirements, and incurred within the period of the award. If this travel is either a requirement stated in the RFA, or clearly documented in the budget justification, no further documentation is required. If not, please see the guidance document Charging Expenses to Sponsored Awards for additional guidance.

Sponsored project travel has a high audit profile and is routinely examined by internal, external and sponsor auditors. Therefore, each transaction must be adequately documented. Sufficient documentation provides clarity so that anyone reviewing the transaction can verify that it is allowable, allocable and reasonable.

If costs are not allowable, allocable, reasonable, consistently treated and sufficiently documented they cannot be charged to a sponsored research project.

Foreign Travel
The definition of foreign travel may differ from sponsor to sponsor and, therefore, each award must be reviewed for this definition. For example, many agencies do not consider travel to Mexico and Canada to be foreign travel. The award must also be examined for any applicable prior approval requirements.

Under the Fly America Act (see link below) travelers are required to use United States (US) air carrier service for all travel funded by Federal agencies. An exception to this requirement is the Open Skies Agreement (see link below). Currently, there are four Open Skies Agreements with the US in effect: European Union (EU), Australia, Switzerland, and Japan. Excluding the EU, check to ensure there is no city-pair contract fare (see link below) in effect in order to use a foreign carrier. If there is a city-pair contract in effect, a US carrier must be used.

The Open Skies Agreement exception does not apply to travel funded by the U.S. Department of Defense.

Please see the Fly America, Open Skies and City Pair Matrix and Fly America Act and Open Skies Agreement Decision Diagram for additional guidance.

There are other exceptions to the Fly America Act which may be appropriate as well. A list of exception criteria may be found in the Federal Travel Regulation Guidelines – FTR sections 301-10.135-138. Please note that lower cost and personal convenience are not acceptable criteria for justifying the non-utilization of a U.S carrier.

Local and Central Approvals

The Aptricity travel and business expense system has two fields that should be completed for all sponsored travel. The traveler should indicate how the travel directly benefits/relates to the project; this is a required field when any part of the travel report allocates expenses to a sponsored award. There is a second field which is used to detail the methodology for the allocation of costs to more than one project. When a traveler uses a non-U.S. flag air carrier for travel to be charged to federally sponsored awards, the Fly America Act Exceptions Form and any relevant supporting documentation is required as an attachment to the travel report. It is important that this information be clearly stated to avoid a delay in reimbursement.

It remains the responsibility of the Principal Investigator to ensure that the expenses follow applicable policies for allowable costs and that the proper authorizations have been made. User approval in the Aptricity travel and business expense system signifies compliance with university policies & procedures, federal cost principles (if applicable), sponsored agreement guidelines, and confirmation that no unallowable costs are included on the report (i.e. alcohol, entertainment, etc).

The following questions should be considered by the reviewer and approver of travel reimbursements charged to sponsored projects:

- Is there justification as to how the trip specifically benefited the award?
- If the charges are split between more than one award, is there justification supporting the basis of proportional benefit or other reasonable method?
- Is the travel allowable, allocable, reasonable and necessary?
- Was the traveler’s salary paid from the sponsored award(s) charged?
  - If not, and the traveler is a graduate student, does other documentation exist (i.e. an abstract referencing the student and the sponsored award) that supports the traveler’s affiliation with the project?
- Does the sponsor require prior approval for travel?
  - If yes, was approval received?
- If the foreign travel is charged to a USAID-sponsored award or subaward, was the travel approved in writing by the Contracting Officer?
- Is the proper account code being used (foreign vs. domestic)?
- Are the invoices and/or receipts attached?
- If applicable, do we have support for the per diem rate?
  - Domestic per diem rates
  - Foreign per diem rates
- Were any alcohol charges removed?
- Did the travel occur within the period of performance of award?
- Did the award budget include funds for travel?
  - If not, do we have rebudgeting authority?
- If foreign travel, does flight meet the Fly America Act regulations?
  - If no, was documentation of the exception attached?
- Do any stops/layovers on the flight(s) seem reasonable?
- Is class of flight coach?

All foreign travel reimbursements are reviewed and approved by Sponsored Programs Accounting prior to processing by the Finance Division. In addition, a post audit of domestic travel is conducted on a monthly basis.

Please contact your SPA Specialist for questions concerning travel requirements and restrictions on specific sponsored agreements.

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