

## Travel on Sponsored Projects

### POLICY STATEMENT

This policy is established to describe the travel guidelines pertaining to sponsored programs at The University of Notre Dame. The overriding purpose is to ensure compliance with the rules and regulations of various funding entities.

All travel expenses charged to federally funded sponsored programs are governed by the cost principles defined by the Office of Management and Budget (“OMB”) as part of [2 CFR 200.475](#). In general, expenses must pass the following three tests in order to be included as direct expenditures on a sponsored project:

1. The cost must be allowable under both the provisions of 2 CFR Part 200, Subpart E in addition to the terms of a specific award. Such travel must provide a direct benefit to the project;
2. The cost must be allocable - the expense can be associated to a project with a high degree of accuracy;
3. The cost must be reasonable - the cost reflects what a “prudent person” would pay in a like circumstance.

Documentation must also support that the participation of the individual is necessary to the award.

The federal government defines domestic travel as any travel within and among the fifty United States and its territories/possessions. Conversely, international travel is defined as any travel outside the United States and its territories/possessions. Domestic and international travel included in the approved budgets of federally sponsored projects is generally permissible if it supports the purpose of the project.

In addition to the criteria listed above, travel costs must adhere to the [University Travel and Business Expense Policy](#). Items covered by the policy include:

1. Preferred travel agencies and programs
2. Air travel (including travel classes, airline clubs, and cancelled/unused tickets)
3. Lodging
4. Car rental and other transportation costs
5. Meals and entertainment
6. Alcohol
7. Per diem
8. Telephone usage
9. Miscellaneous reimbursable/non-reimbursable expenses
10. Travel and expense reports

Areas where additional guidance or information is necessary to determine the appropriateness of travel costs for sponsored agreements are as follows:

1. **Fly America Act/Open Skies Agreements:** Before making any arrangements for travel funded by a federal grant or contract, departments should consult the terms and conditions of the specific award, the approved budget and review the requirements of the [Fly America Act/Open Skies Agreements](#). The Open Skies Agreements allow non-US Flag carriers to be used for travel in many cases. Please refer to [Open Skies summary](#) or contact your ND Research Administration Grant Program Manager to determine if your travel falls within these parameters. For all other travel a [United States flag air carrier](#) must be used for any/all travel outside the United States. For purposes of this Act, “United States” is defined as the 50 states, the District of Columbia, and United States territories/possessions. This requirement shall not be influenced by cost, convenience, or personal travel plans. Additional circumstances may apply whereby an exception to this Act is appropriate, such as where a [Code Sharing Arrangement](#) exists or a US Flag Carrier does not service the route. Use of the Fly America Act Waiver Checklist (Appendix A) should be used to identify legitimate exceptions for use of a non-U.S. carrier.
2. **Commercial Air Travel:** When supported by federal awards, airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines (coach class or similar) are unallowable except when such accommodations would:
  - a. Require circuitous routing;
  - b. Require travel during unreasonable hours;
  - c. Excessively prolonged travel;
  - d. Result in additional costs that would offset the transportation savings or
  - e. Offer accommodations not reasonably adequate for the traveler’s medical needs.

However, the University’s Travel and Business Expense Policy states, “Travelers must book the lowest price nonstop (when available) coach class airfare available that reasonable meets the traveler’s schedule”. This policy applies to all travel, regardless of funding source. Travelers are encouraged to book airfare through travelND or Anthony Travel to take advantage of discount programs the University has with various airlines and secure the lowest reasonable cost for flights.

**Change Fees:** If a ticket has to be changed and a fee is incurred, the traveler may claim payment for the fee. The fee may be an allowable charge to a sponsored project based on the documented facts and circumstances.

3. **Cancelled Travel Costs:** Travelers who have purchased tickets or incurred expenses for travel on sponsored programs which are subsequently cancelled are encouraged to rebook unused airfare and cancel lodging reservations and conference fees whenever possible. If the travel is not postponed to a future date, then the expenses should not be charged to the sponsored program, but rather a university fund; unless the travel has been cancelled due to circumstances beyond the traveler’s control. In these cases appropriate documentation, including an explanation for the cancellation, must be included with the Travel & Expense report.

4. **Advanced Approval Required:** Since, sponsor regulations vary (including pre-approval requirements on all travel expenditures), principal investigators should be familiar with advanced approval requirements applicable to their project.
5. **Travel Dates:** All travel must be completed within the performance period of the sponsored program. Prepaid travel costs (e.g. airfare and registration fees) may not be charged to a sponsored program when actual travel or training occurs after the end date of the award.
6. **Individuals Traveling on Sponsored Programs:** Only persons with an appointment on an award are permitted to be reimbursed for travel expenses unless written justification is provided. In some cases sponsor approval may be required.

## FLY AMERICA ACT WAIVER CHECKLIST

(To assist in determining qualification for a waiver of the restrictions of the Fly America Act under 41 CFR Part 301-10, check the applicable statement(s) below).

- Foreign air travel on a non-U.S. air carrier is financed by U.S. Government, or will be claimed as costs under an award. (If you do not check this block, the restrictions of the Fly America Act do not apply. Check at least one of the statements below to qualify for a waiver of the restrictions of the Fly America Act.)
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- Use of foreign air carrier is a matter of necessity because of: (Must check one below)
- U.S. flag air carrier cannot provide the air transportation needed, e.g.
    - Use of foreign air carrier is necessary for medical reasons.
    - Use of foreign air carrier is required to avoid unreasonable risk to traveler's safety. (See 41 CFR 301-10.138(b)(2) for supporting evidence needed.)
    - Seat on U.S. air carrier in authorized class of service is Unavailable and seat on foreign air carrier in authorized class of service is available.
    - Other (Provide detailed explanation.)
  - Use of U.S. flag air carrier will not accomplish the Department's mission. (Provide detailed justification)
- Bilateral or multilateral air transportation agreement exists. U.S. is a party and Dept. of Transportation determines agreement meets requirements of Fly America Act.
- No U.S. flag air carrier provides service on a particular leg of your route (Travelers can only use foreign air carrier to or from the nearest interchange point to connect with a U.S. carrier).
- A U.S. flag air carrier involuntarily reroutes traveler on a foreign air carrier.
- Service on a foreign air carrier is three hours or less, and use of U.S. flag air carrier doubles en route travel time.
- Air travel is between the U.S. and another country and use of a U.S. carrier on a nonstop flight extends travel time by 24 hours or more.
- Other air travel (You must check at least one of the following statements to qualify for a waiver of the Fly America Act restrictions in this section)
- Use of a U.S. carrier increases the number of aircraft changes outside the U.S. by two or more legs
  - Use of a U.S. carrier extends travel time by six hours or more
  - Use of a U.S. carrier requires a connecting time of four hours or more at an overseas interchange point

Remember, you must use a U.S. flag air carrier on every portion of the route where it provides service unless you qualify for a waiver.