TRAVEL ON SPONSORED AWARDS
Best Practices

Background and Purpose

Sponsored travel is allowable as a direct cost when such travel is reasonable, allowable, allocable and will provide direct benefit to the award. It is reimbursable when it is properly documented, approved, and in compliance with University policy and IRS and sponsor regulations. Federally funded sponsored travel is also subject to certain federal laws and the guidelines set forth in the Uniform Guidance. When there is a conflict between University policy and award requirements, the more restrictive policy applies.

Abbreviations

Abbreviations	Meaning
CONCUR Travel and Expense	The electronic expense management system tool used by BU to automate the reporting, approving, and processing of travel and business expense reports.
DA	Department Administrator
SP - Post	Post Award Financial Operations
PI	Principal Investigator
SA	School Administrator
SAP	BU's general accounting system

Roles and Responsibilities

Person	Role and Responsibility
DA/SA	Ensure that travel charges to sponsored projects are accurate, appropriate, allowable, approved, supported with documentation and in compliance with University policy and IRS and sponsor regulations.
Financial Approver	Individual assigned as the financial cost object approver in SAP (Financial Accounting) for a school/college/unit cost center. Responsible for completing a secondary approval for expense reports in the Expense Management System (after Supervisor approval) ensuring that any and all "audit flags" identified in the report have been cleared or addressed, all expenses are charged to the proper account(s), there are sufficient funds available for the expenditures and the report complies with all applicable policies.
SP - Post RA	Review Concur sponsored travel expenses on a quarterly basis using a risk based approach. Assist DA/SA/PI with sponsored travel related questions.
PI	Ensure that travel charges to sponsored projects are accurate, appropriate, allowable, approved, supported with documentation and in compliance with University policy and IRS and sponsor regulations. Provide traveler with written approval of sponsored travel expense reports when applicable.
Supervisor/Approver	Individual assigned as an employee's direct supervisor in SAP (Human Capital Management). Responsible for reviewing and approving expense reports submitted by any direct reports in the Expense Management System and ensuring reports comply with all applicable policies.

Traveler	The individual traveling/incurring a business expense and processing an expense report. Responsible for ensuring that the travel and business expense policies are followed (even if a booking/reporting function is delegated to another individual). This includes obtaining the appropriate approvals, completing the required forms and maintaining and submitting sufficient supporting documentation for review (i.e. original itemized receipts).
Travel Services	Provide customer service support for booking travel at Boston University, ongoing training and support for the travel and business expense management system, processing of travel and business expense reports in a timely manner and review of travel and expense reports for policy compliance.

Process Flow

- Prior to incurring any sponsored travel cost for reimbursement, DA/SA, PI, Cardholder, Supervisor, Financial Approver and Travelers should have a full understanding of University, College, School and Department guidelines on travel and business expenses, sponsoring agency regulations and the specific terms and conditions of the award.
- PI approves travel in writing before any travel expenses are incurred.
- Cardholder purchases sponsored travel arrangements utilizing the University Travel Card whenever possible and appropriate. Ensures that each card transaction is assigned to an Expense Report within 30 days of the transaction date; retains all original itemized receipts for card charges $25 or greater; attaches them to the relevant transactions in Concur and submits the Expense Report for approval.
- Traveler's supervisor reviews report for compliance with applicable policies and approves or returns it as appropriate.
- The Financial Approver performs a secondary report review for compliance with applicable policies and approves or returns it as appropriate.
- Travel Services performs a final report review and submits it for payment or returns it as appropriate.

Air Travel on Sponsored Awards

- When traveling under a federally sponsored project, airfare costs are subject to guidelines established by the Uniform Guidance 2 CFR 200, §200.474 Travel Costs.
- Federal regulations prohibit the charging of Business Class (or First Class) accommodations to federally sponsored projects unless it is specifically approved by the sponsoring agency. If a traveler does fly Business Class, and the University has approved the use of Business Class airfare, the traveler must allocate the difference between the Business Class and the lowest available fare Coach ticket to a non-sponsored discretionary cost object.
- Travelers must comply with the Fly America Act which requires travelers to use:
  - A U.S. flag air carrier (an airline owned by an American company); or
  - A foreign carrier that operates under a U.S. Flag air carrier code-sharing agreement and identifies the U.S. flag air carrier's designator code and flight number.*
  - These carriers must be used unless the traveler can prove that such carriers were unavailable or that one or more criteria were met which waives the restriction on carrier.
- Allowable exceptions to the Fly America Act
  - When a U.S. air carrier is not available.
  - When the use of a U.S. carrier service would extend the travel time by 24 hours or more.

- When a U.S. carrier does not offer a nonstop or direct flight between origin and destination, and using a U.S. carrier:
  - Increases the number of aircraft changes outside the United States by two or more;
  - Extends travel time by six hours or more; or
  - Requires a connecting time of four hours or more at an overseas interchange point.
- When the flight time from origin to destination is less than three hours and using a U.S. flag carrier doubles the flight time.
- When there is an applicable Open Skies Agreement in effect that meets the requirements of the Fly America Act.
- The exceptions provided by the Open Skies Agreements for government-funded travel do not apply if your transportation is funded (as a direct award or as a pass-through award) by the Department of Defense (DOD).

- The Open Skies Agreements enable travelers flying internationally using federal funds, to travel on European Union airlines as well as US Flag Air Carriers.
  - Travelers can also use an Australian, Swiss, or Japanese airline as long as a point of origin/destination is either the US or the country whose airline is being used (Australia, Switzerland, or Japan), and there is no city-pair contract flight between the points of origination and destination.
  - There is no Open Skies treaty with Canada, so flights on Air Canada, WestJet and Porter Airlines are unallowable on federal awards. (Please note that Canada should be coded as DOMESTIC travel in our system).
- Unallowable exceptions to the Fly America Act:
  - Cost savings
  - Convenience
- For guidance identifying which airline carriers can be used for travel, refer to this Fly America, Open Skies and City Pair Matrix.
- If you still aren't sure about what carrier to use under the Fly America Act or Open Skies Agreements you can send an email to the GSA for clarification. Retain a copy of the email and attach it to your travel expense report as proof that the carrier, or time of flight, was allowable. Or contact BU Travel Services for assistance and questions.

*Code sharing occurs when two or more airlines "code" the same flight as if it was their own, so a US airline might sell a seat on the plane of a foreign air carrier but the ticket shows the US airline's code and flight number. For example when Delta sells seats on an Air France flight, and the ticket shows DL## for Delta (rather than AF##).

Reference Documents

- 2 CFR 200, §200.474 Travel Costs
- 2 CFR Part 200—uniform administrative requirements, cost principles, and audit requirements for federal awards
- Boston University's Travel Policy
- Fly America Act
- Fly America, Open Skies and City Pair Matrix
- http://www.bu.edu/researchsupport/forms-policies/travel-on sponsored-awards/
- http://www.bu.edu/tech/support/buworks/
- http://www.bu.edu/travelservices/
- https://bu.service-now.com/fa
- https://www.gsa.gov/policyregulations/policy/travelmanagement-policy/fly-america-act#OSA

- https://www.gsa.gov/policy-regulations/regulations/federal-travel-regulation/federal-travel-regulation-and-related-files
- https://www.transportation.gov/policy/aviationpolicy/certificated-air-carriers-list
- travelpolicy@gsa.gov