

Learn More Session: ***Processing Travel Reimbursements*** ***for Sponsored Projects***

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**Northeastern
University**

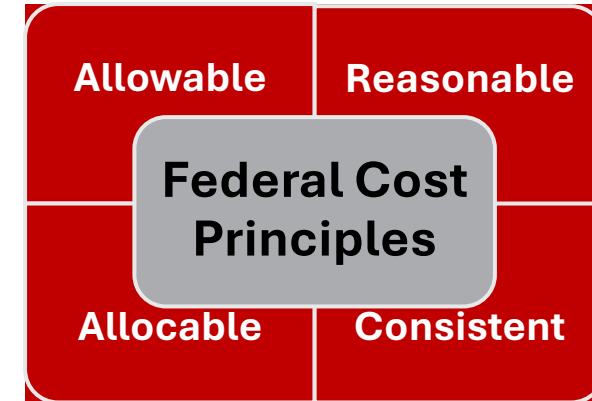
Overview

- Gain better understanding of federal regulations and take a deep dive into our institutional policies.
- Review procedures and supporting documentation requirements.
- Compliance Reviews and red flags.

Why?

- Increase in volume of reimbursement requests received by NURES Finance.
- More audits, site visits, and sponsor requests for supporting documentation.
- Increase in travel spending.

**Includes posted expenditures to account codes with “travel” in the account code description (ledger-5 only).*



Fiscal Year	Travel Expenses*
2022	\$ 1,168,077
2023	\$ 3,231,852
2024	\$ 3,877,188
2025 (Jul-Sep)	\$ 1,064,609

Federal Regulations – Uniform Guidance

Uniform Guidance | 200.475 Travel costs

General:

Travel costs include the transportation, lodging, subsistence, and related items incurred by employees who are in travel status on official business of the recipient or subrecipient. **These costs may be charged on an actual cost basis, on a per diem or mileage basis, or on a combination of the two, provided the method used is applied to an entire trip and not to selected days of the trip.** The method used must **be consistent with those normally allowed in like circumstances** in the recipient's or subrecipient's other activities **and in accordance with the recipient's or subrecipient's established written policies.** Notwithstanding the provisions of [§ 200.444](#), travel costs of officials covered by that section are allowable with the prior written approval of the Federal agency or pass-through entity when they are specifically related to the Federal award.

Lodging and subsistence:

Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, must be considered reasonable and otherwise allowable only to the extent such costs do not exceed charges normally allowed by the recipient or subrecipient in its regular operations as the result of the recipient's or subrecipient's established written policy. **In addition, if these costs are charged directly to the Federal award documentation must justify that:**

- 1. Participation of the individual is necessary for the Federal award; and**
- 2. The costs are reasonable and consistent with the recipient's or subrecipient's established written policy.**

Source: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRed1f39f9b3d4e72/section-200.475>

Federal Regulations – Uniform Guidance

Uniform Guidance | 200.475 Travel costs - Continued

Commercial air travel:

1. 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;
 - (ii) Require travel during unreasonable hours;
 - (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 recipient or subrecipient must **justify and document these conditions on a case-by-case basis** for the use of first-class or business-class airfare to be allowable in such cases.
2. Unless a pattern of avoidance is detected, the **Federal Government will generally not question a recipient's or subrecipient's determinations** that customary standard airfare or other discount airfare is unavailable for specific trips **if the recipient or subrecipient can demonstrate that such airfare was not available in the specific case.**

Source: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-E/subject-group-ECFRed1f39f9b3d4e72/section-200.475>

Federal Regulations – NIH GPS

NIH Grants Policy Statement | 7.9 Allowability of Costs/Activities

Meals: Allowable for subjects and patients under study, or where specifically approved as part of the project activity, provided that such charges are not duplicated in participants' per diem or subsistence allowances, if any. When certain meals are an integral and necessary part of a meeting or conference (i.e., a working meal where business is transacted), grant funds may be used for such meals only when consistent with terms of award. **Recurring business meetings, such as staff meetings, should not be broadly considered as meetings for the primary purpose of disseminating technical information in order to justify charging meals or refreshment costs to grants.**

Travel: Allowable as a direct cost where such travel will **provide direct benefit to the project.**

Travel/Employees: Consistent with the organization's established travel policy, these costs for employees working on the grant-supported project may include associated per diem or subsistence allowances and other travel-related expenses, such as mileage allowances if travel is by personal automobile. In all cases, **travel costs are limited to those allowed by formally established organizational policy and, in the case of air travel, the lowest reasonable commercial airfares must be used... Recipients must comply with the requirements of the Fly America Act (49 U.S.C. 40118)** which generally provides that foreign air travel funded by Federal funds may only be conducted on U.S. flag air carriers and under applicable Open Skies Agreements. For additional information regarding the Fly America Act and its exceptions, see Public Policy Requirements and Objectives-Fly America Act.

Source: https://grants.nih.gov/grants/policy/nihgps/html5/section_7/7.9_allowability_of_costs_activities.htm

Federal Regulations – NSF PAPPG

NSF Proposal & Award Policies & Procedures Guide

Chapter II: Proposal Preparation Instructions

Travel (Line E on the Proposal Budget):

- (a) General: When anticipated, travel and its relation to the proposed activities must be specified, itemized, and justified by destination and cost. Funds may be requested for field work, attendance at meetings and conferences, and other travel associated with the proposed work, including subsistence. To qualify for support, however, **attendance at meetings or conferences must be necessary to accomplish proposal objectives or disseminate research results**. Travel support for dependents of key project personnel may be requested only when the travel is for a duration of six months or more either by inclusion in the approved budget or with the prior written approval of the cognizant NSF Grants and Agreements Officer... Allowance for air travel normally will not exceed the cost of round-trip, economy airfares. Persons traveling under NSF awards must travel by U.S.-Flag Air carriers, if available.
- (b) Domestic Travel: Domestic travel includes travel within and between the U.S., its territories, and possessions. Travel, meal, and hotel expenses of recipient employees who are not on travel status are unallowable. Costs of employees on travel status are limited to those specifically authorized by 2 CFR § 200.475.
- (c) Foreign Travel: Travel outside the areas specified above is considered foreign travel. When anticipated, the proposer must enter the names of countries and dates of visit on the proposal budget, if known.

Chapter VIII: Financial Requirements and Payments

Travel and Temporary Dependent Care Costs:

- (a) **Travel, meal, and hotel expenses of recipient employees who are not on travel status are unallowable.** Costs of employees on travel status are limited to those specifically authorized by 2 CFR § 200.475...

Source: <https://new.nsf.gov/policies/pappg/24-1/ch-10-allowability-of-costs#ch10.C3>

Federal Regulations – Fly America Act

All air travel and cargo transportation services funded by the federal government are required to use a “U.S. flag” air carrier service. You can find a [complete list of certified U.S. flag air carriers on transportation.gov](#).

This requirement applies to

- Federal government employees and their dependents
- Consultants, contractors, and grantees
- Other travelers whose travel is paid for by the federal government

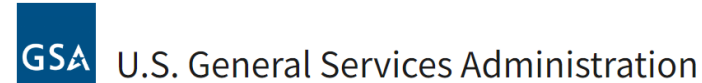
Resources:

[NURES Federal Policies & Guidelines](#)

[Fly America Act FAQs \(NURES Website\)](#)

[Fly America Act \(GSA Website\)](#)

[Fly America Cheat Sheet \(GSA Website\)](#)



Federal Policies and Guidelines

Allowable Costs Guidelines

Avoid duplicate funding of the same project
("double dipping")

Fly America Act. – 49USC 40118

Fly America Act FAQs

Federal Acquisition Regulation

OMB Uniform Guidance

Responsible Conduct of Research

Sponsor Prior Approval Matrix for Federal Sponsors

Federal Regulations – FAA Exceptions



U.S. General Services Administration

Exceptions to the Fly America Act

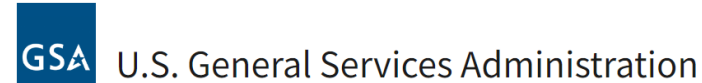
There are some circumstances where it's not reasonable to use a U.S. flag air carrier, and you can make an exception to the Fly America Act. These circumstances are:

1. When a U.S. air carrier is not available.
2. When using a U.S. carrier service would extend the travel time by 24 hours or more.
3. When a U.S. carrier does not offer a nonstop or direct flight between origin and destination, and using a U.S. carrier:
 1. Increases the number of aircraft changes outside the United States by two or more;
 2. Extends travel time by six hours or more; or
 3. Requires a connecting time of four hours or more at an overseas interchange point.
4. When the flight time from origin to destination is less than three hours and using a U.S. flag carrier doubles the flight time.
5. 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 by the Department of Defense.

Note: Ticket cost and convenience are NOT exceptions to the Fly America Act. All exceptions must be documented.

Federal Regulations – Open Skies Agreement



Open Skies Agreements

Bilateral or multilateral agreements between the U.S. Government and the governments of foreign countries that allow travelers to use foreign air carriers from these countries for government-funded international travel. Many Open Skies Agreements exist but **only four agreements meet Fly America Act requirements** which the key factor is the statement for “U.S. Government Procured Transportation” in either the Article or Annex of the agreement. The United States currently has Open Skies Agreements in effect with:

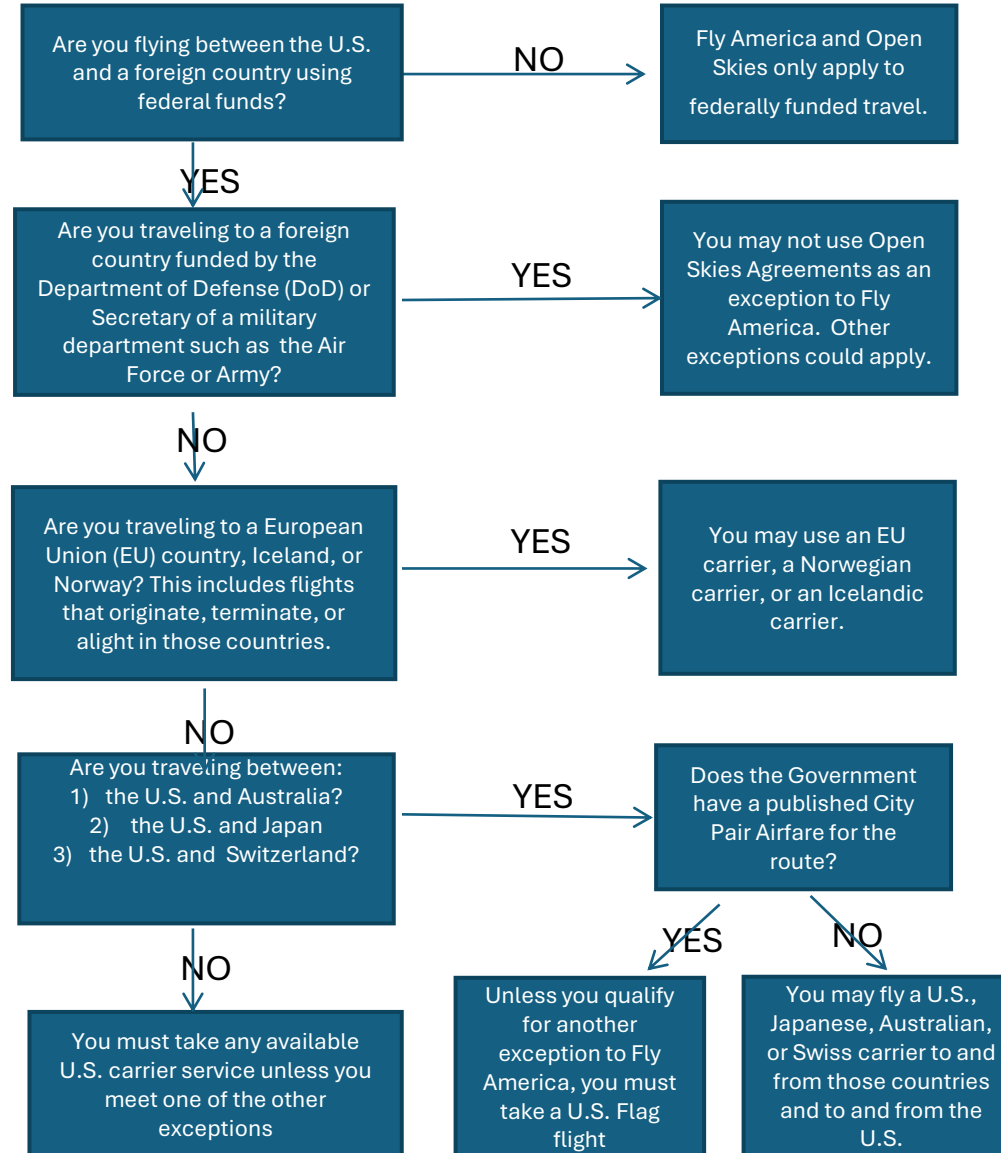
1. European Union (28 countries) (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, including Iceland and Norway)
2. Australia
3. Switzerland
4. Japan

The agreement with the European Union permits the use of an EU air carrier for travel outside the United States. Iceland and Norway are not EU members, but are members of the EU air treaty. This is the only one of these four agreements that allows for an origin or destination in a third country as long as the flight stops in the EU.

The exceptions provided by the Open Skies Agreements do not apply if your transportation is funded by the Department of Defense.

Fly America Cheat Sheet (GSA Website)

Fly America and Open Skies Agreements



NU Policy on Travel & Expense Reimbursement

Policy on Travel & Expense Reimbursement

To qualify for reimbursement, expenditures shall be made using the most cost effective method possible. University will reimburse for **actual expenditures incurred**, and not for a per diem of any amount. This Policy is intended to reasonably ensure that reimbursements/reconciliations comply with IRS accountable-plan rules. Accordingly, under the university's expense reconciliation process, for expenses incurred by university employees to be reimbursable:

1. **Expenses must have a business connection** - that is, the employee must have paid or incurred deductible expenses while performing services as an employee of the university.
2. **Employees must adequately account to the university for these expenses within a reasonable period of time.**
3. **The employee must return any excess reimbursement or allowance within a reasonable period of time.**

In order to comply with these rules, expenses must be adequately accounted for **within 60 days** after they were paid or incurred and any excess reimbursements must be returned within 120 days after they were paid or incurred (any extensions to these time limits are by exception only).

Authorization of expense reimbursement is the responsibility of an employee's Next Level Supervisor, as defined in this Policy and as recorded in the university's Banner HRM database. By approving the reimbursement, and that the request for reimbursement is in accordance with University policy, the next level supervisor is certifying that the expense was necessary to accomplish the University's objectives

NU Policy on Travel & Expense Reimbursement



Follow the steps below to be reimbursed for out-of-pocket, work-related expenses or to reconcile expenses you've made on a Northeastern AMEX.

- ✓ Solution 1: You're a full-time benefit eligible faculty or staff member seeking reimbursement ✓
- ✓ Solution 2: You're a part-time employee, a student, or a contractor seeking reimbursement ✓
- ✓ Solution 3: You're a part-time employee who files expense reports on another employee's behalf ✓

<https://finance.northeastern.edu/tasks/plan-travel-or-prepare-expenses/complete-an-expense-report-or-get-reimbursed-for-travel/>

NU Policy: Concur System

Policy on Travel & Expense Reimbursement

Concur is required for Full-Time, Benefits Eligible Employees and/or Employees with NUCards.

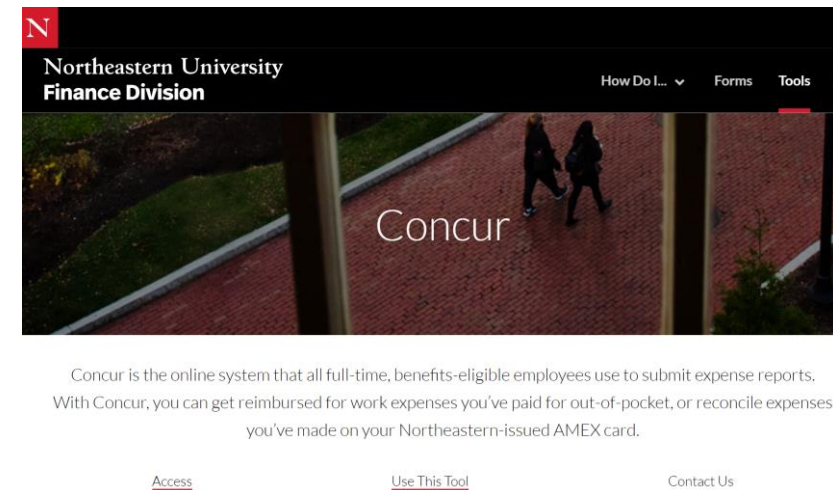
Travel and Expense reconciliations must be processed through the Concur system within 60 days of the transaction date. Each line item must include:

1. A business purpose for each expense
2. Itemized receipts are required for all expenditures \geq \$75.00. However, receipts are strongly recommended for all expenditures
3. For business meals, a list of attendees for parties under 10 is required

Grants & Contracts (ledger-5):

- NURES Finance approval is required. Concur system routes reports/statements to ResFin when costs are being allocated to ledger-5.
- ResFin Approvers: Stacey Cugini, Giovanni Ortiz. Backup: Fiorella Chavez.
- Final approver: NU AP team.

Resources: <https://finance.northeastern.edu/tools/concur/access>



NU Policy: Expense Reimbursement Voucher

Policy on Travel & Expense Reimbursement

Other Travelers (Non-full-time Employees w/out NUCards, Students and University Guests)

Travel and Expense reconciliations must be processed using the [Expense Reimbursement Voucher](#). Submissions are by email and the report must include:

1. The name and home address of the person requesting reimbursement
2. A justification (when/why/where?) for the expenses
3. Itemized receipts for all expenditures \geq \$75.00. However, receipts are strongly recommended for all expenditures
4. The necessary Banner Indexes and Account Codes to be charged
5. The signature of an authorized budget approver of the sponsoring unit

Grants & Contracts (ledger-5):

- NURES Finance approval is required. Department Administrators can email “paper” reimbursements to research_finance@northeastern.edu for review/approval.
- ResFin Approvers: Research Finance Analysts - Clarissa Fillis, Meg Connolly, Kendra Todman, Stanlyann Alton, Shaq Ebadi, Amy Gill. Backup: Heidi Copeland, Fiorella Chavez.
- Final approver: NU AP team. ResFin will submit final reimbursement packages to AP via email at invoice@northeastern.edu.

Resources: <https://finance.northeastern.edu/tasks/plan-travel-or-prepare-expenses/complete-an-expense-report-or-get-reimbursed-for-travel/>

Student or Non-Employee Name:			
NU ID # (REQUIRED if applicable):		Email Address:	
A completed W9 form (Domestic) or International Supplier Registration form (International) is required for all new payees (not yet paid via Banner).			
Did you travel or have a meal at the expense of the University?		Did you make a non-travel purchase at the expense of the University?	
Travel Expenses (complete blue font area below)		Non-Travel Expenses (complete green font area below)	
Destination:		Description:	
Dates of Travel:		Date of Expense:	
Purpose:		Purpose:	
(continued from above)		(continued from above)	
SUMMARY OF EXPENDITURES			
	INDEX	ACCOUNT CODE	OUT OF POCKET EXPENSES
Air Fare		73021	\$0.00
Train Fare		73022	\$0.00
Bus Fare		73023	\$0.00
Taxi		73024	\$0.00
Mileage		73025	\$0.00
Auto Rental		73026	\$0.00
Lodging		73027	\$0.00
Meals		73028	\$0.00
Other Items (Misc)		73030	\$0.00
Seminar Registration		74310	\$0.00
Non-Travel Expenses			
Non-Travel Expenses			
Non-Travel Expenses			
TOTAL EXPENSES			\$0.00
APPROVALS			
Send this form to AP with ORIGINAL RECEIPT(S) ATTACHED. Itemized Receipts are recommended for all expenses BUT REQUIRED for all expenses of \$75 or more. Please provide business purpose of expenses and names of others covered by these expenses on page 2.			
Minimum of two signatures is required for each Expense Reimbursement Voucher, regardless of funding source.			
Student/Non-Employee	printed name	signature	Date:
I certify that this report is a true and accurate accounting of expenses incurred in connection with authorized University travel. If funded by a grant or contract, I further certify that these expenses comply with the applicable cost principles and regulations of the sponsoring entity.			
Minimum of two signatures is required for each Expense Reimbursement Voucher, regardless of funding source.			
Next Level Supervisor *	printed name	signature	Date:
Funding Approval (within department)			
	printed name	signature	Date:
* Signature of student or non-employee's next level manager (or their delegate) required			
NU-RES approval needed for all expenses being charged to an Index number that begins with a '5'.			

NU Policy: Travel Arrangements

Policy on Travel & Expense Reimbursement

Advance Authorization

- **Domestic Travel:** It is strongly recommended that the employee provide a business purpose for the travel and an emergency contact number to their next level supervisor prior to departure.
- **International Travel:** Please review the university's [policy on International Travel](#) prior to booking any arrangements. It is highly recommended that all faculty traveling internationally provide their itinerary and accommodations by enrolling in NU's [Travel Registry](#). Administrators and staff going on university-sponsored travel are required under the policy to register their travel plans.

Procedures for Making Travel Arrangements

- Procurement Services has negotiated contracts with special rates and services for employees who travel on University business. Contracts are in place with travel agencies, airlines, car rental agencies, and hotels. Please book all travel arrangements in Concur where the negotiated rates are preloaded.
- **Out of Pocket Expenses:** Any employee traveling on University business is highly encouraged to use their NUCard or the Concur Travel reservation system for airfare and lodging. Any exceptions (e.g. NUCard is not accepted, reservation booked directly from airline) should be noted in Concur to support the out of pocket expense.

**Compliance with these requirements not vetted by NURES Finance.*

NU Policy: Cancelled Trips & Personal Travel

Policy on Travel & Expense Reimbursement

Cancelled Trips

It is the responsibility of the employee to cancel all reservations and contact the appropriate agency or organization for refunds of any expenditure prepaid by the University (e.g. conference fees, airfare, etc.) In addition, the employee must also advise his/her budget administrator of the cancellations and the status of any refunds. All refunds must be returned to the University for proper credit. Employees are not allowed to use credit from business trip cancellations for personal use.

Personal Vacation Travel

Many of our vendors, including airline, rail and hotels, allow discounts or use of our [negotiated contracts](#) for personal travel. You may be required to prove affiliation with the University (e.g., Husky Card) to receive the discount. Vendor relationships are subject to change at any time; it is advisable to check the website prior to personal or business travel to confirm discount eligibility. Any personal travel must be paid by the traveler.

Grants & Contracts (ledger-5):

- Allocate costs to grants *after* the travel takes place to avoid dealing with cancelled trips.
- Personal travel costs are unallowable.
- Reimbursements combining Business (i.e., grant-related travel) and Personal Travel can be processed if there is proof that only the business portion/cost of the trip is being reimbursed from the grant.

NU Policy: Air Travel & Meals

Policy on Travel & Expense Reimbursement

Air Travel: All personnel should travel Economy (or on special reduced fares, when available), except for the following situations:

- For Research grants (5xxxxx Fund/index) please consult the regulations of your funding organization. In most cases, first class/ business travel is not allowed except in special circumstances. Please contact your representative in NU-RES for additional assistance.
- First Class Travel (and Business Class in the case of international flights) is not reimbursable unless authorized in advance by the President and/or the responsible member of the Senior Leadership team, or for Travelers with medical conditions (documentation is required).

Meals: Employees are expected to exercise good judgment when ordering meals when traveling on University business... It is the responsibility of the next level supervisor to review these charges for reasonableness prior to granting approval of the request.

Alcohol: while not specifically prohibited by University policy must always comply with all funding requirements and in all circumstances must be limited to reasonable and responsible consumption.

Business trips which also include travel for personal reasons will be reimbursed only for the business portion of the trip... Legible copies of the itinerary covering the routing of both the personal and business portions of the trip must be submitted.

Grants & Contracts (ledger-5):

- Alcohol is unallowable. Reports/reimbursements will be returned to remove alcohol charges, as applicable.
- UG Reminder: Airfare costs in excess of the basic least expensive unrestricted accommodations class offered by commercial airlines are unallowable. Exceptions are offered, but you must justify and document these conditions on a case-by-case basis.

NU Policy: International Travel

Policy on Travel & Expense Reimbursement

Using Sponsored Funds for Air Travel: In accordance with the Fly America Act (FAA), commercial air travel and movement of cargo on Federally funded grants must comply with the requirement that U.S. flag air carriers be used to the maximum extent possible when traveling between the U.S. and a foreign country or between foreign countries. The Open Skies Agreement (OSA), however, allows for the use of foreign air carriers under certain circumstances. All travelers using sponsor-funds must comply with the FAA unless exceptions in the OSA pertain. For more information on international considerations, please contact NURES.

International Currency: For payments made with a NUCard, Concur will electronically convert foreign currency to US Dollars via an embedded formula based upon the date and the geography where the transaction occurred. It is highly recommended that employees use the same [conversion tool \(OANDA\)](#) as Concur for out of pocket foreign currency transactions.

1. **All transactions submitted in a Concur report must be in US Dollars.**
2. **Transaction details must be provided in English for all receipts printed in a foreign language.**
3. **For expense reports submitted on a paper expense voucher, documentation supporting the exchange rate used must be attached to report.**

Grants & Contracts (ledger-5):

- Reimbursements must be compliant with FAA if being paid from federal awards.
- Receipts in foreign language must be provided in English.
- Receipts in foreign currency must be in USD using OANDA converter.
- All backup must be attached to the reimbursement package when submitting to ResFin/AP for review.

NU Policy: Lodging, Taxes, Other Costs

Policy on Travel & Expense Reimbursement

Lodging: Accommodations should be at a reasonable cost, comfortable and convenient to the place of business. The hotel folio that details day-by-day charges (e.g., lodging, meals, taxes, incidentals) and that indicates proof of payment must be submitted (if available) in Concur. For extended residence, the employee should attempt to obtain accommodations on a weekly or monthly basis at reduced rates.

Sales Tax: [NU is exempt from state sales/use tax in a number of states](#). This exemption does not extend to taxes of other types (e.g., meal tax, hotel tax, tourism taxes, etc.) It is the employee's responsibility to obtain the point of contact at the supplier and to submit a [tax exception certificate](#). The University will not reimburse employees for state sales tax paid on the purchase of goods with personal funds.

Other Costs: see policy for personal automobile use, automobile rentals, collision insurance, and discount rail fares.

Grants & Contracts (ledger-5):

- Hotel folio with detailed charges is required.
- Receipts for food purchases included in folio (i.e. room service) must be itemized.
- Length of stay should be reasonable and cover the duration of grant-related travel. +/- 1 days is generally acceptable.
- Excessive upgrades or unreasonable lodging accommodations will be questioned.
- Concur will use the miles traveled and the current reimbursement rate to calculate the allowed reimbursement.
- For paper reimbursements, provide copies of maps to support the locations/miles traveled.

Compliance Reviews – PI, Dept, ResFin

Key components:

- ✓ Award is active and has sufficient funds to cover reimbursement.
- ✓ Dates of travel are within the authorized period of performance.
- ✓ Reimbursement is in compliance with NU policies and procedures and federal regulations, as applicable.
- ✓ Travel costs are budgeted in Banner. If not budgeted, determine if sponsor prior approval is required:
 - a. If prior approval is required, package cannot be approved and is returned to submitter.
 - b. If prior approval is not required, confirm request provides a justification for rebudget needs, no change in scope, etc. *Note: Banner does not need to reflect this internal rebudget.*
- ✓ Evidence of review/sign-off by the PI or Department Administrator
- ✓ Validate role of employee (i.e., is individual paid from grant).

Red flags:

- × Gaps in supporting documentation
- × Lack of itemized receipts, proof of payment, hotel folios, etc.
- × High volume of charges < \$75 without details.
- × Late reimbursement requests.
- × Reimbursements for individuals without a clear role on project.
- × Increase in spending at the end of budget or project period.
- × Spending outside of the awarded budget period.



Compliance Reviews – Sample Justification

Please keep in mind that all purchases must be in accordance with university and sponsor guidelines, including providing a detailed business purpose indicating what a purchase is and how it will benefit the award(s). Generally, a business purpose should answer the “who, what, when, where, why, how” line of questioning:

- **Who** made the purchased and/or used the items?
- **What** was purchased?
- **When** was the purchase and/or activity in which the items were used?
- **Where** were the items used?
- **Why** was the purchase necessary?
- **How** were the items used to benefit the project?

Example: **John Doe** used petty cash to purchase **poster boards** on **11/07/2023** to use at the **XYZ conference in San Francisco, CA**, on **11/10/2023** to **present research findings associated with Aim 1 of the scope of work**.

Questions

[NSF Travel_Costs_Self-Assessment_Tool.pdf](#)

