

TRAVEL POLICY

Travel Policy

Policy Sections

- **Policy Statement**
- **Reason for Policy**
- **Who Should Know This Policy**
- **Contacts**
- **Applicable ACP Policies**
- **Applicable Federal Regulations & Criteria**
- **ACP Travel Policy**
- **Roles & Responsibilities**

Last Revised: May 2014

Responsible Officer

Administrative Vice President

Policy Statement

This policy is designed to set forth the requirements regarding staff and participant travel. The Aspen Center for Physics (ACP) is responsible for ensuring that travel costs charged to a sponsored award, to a foundation or private award or to the General Fund are allowable, allocable, and reasonable under the applicable travel policies pursuant to the specific award.

Reason for Policy

This policy is issued to define the appropriate charging of travel costs at ACP. This policy provides a foundation for good stewardship of funds awarded to ACP and to meet compliance standards outlined by external regulations, including the Federal guidelines in OMB Circular A-122, Cost Principles for Non-Profit Organizations and compliance standards for non-Federal awards. As a recipient of Federal awards, ACP is required to meet the criteria outlined in this circular that establishes standards that must be followed for consistency in accounting and costing practices. Adherence to this policy is necessary to prevent cost disallowances and penalties by the Federal government and other sponsoring agencies.

Who Should Know This Policy



- Principal Investigators
 - Administrative Staff
 - Officers
 - Winter Program/Conference Organizers
 - Travel Support Recipients
 - Trustees
 - Board Members
-

Contacts

Subject	Contact
Policy Questions	Administrative VP
Finance Procedure Questions	Finance Manager

Applicable ACP Policies

- Participant Support Costs: Policy & Operational Procedure
 - Chart of Accounts: Operational Procedure
-

ACP Travel Policy

Introduction and Definition:

These guidelines are not meant to be an exhaustive statement of ACP policies, but rather sufficient guidance to seek reimbursement. Questions should be addressed to the ACP Administrative Vice President.

ACP reserves the right to amend or revise policies and procedures at any time. Changes in policies and procedures will be distributed to ACP staff and are to be considered effective on their date of issue.

These general policies and procedures apply to most official ACP travel based on minimum administrative and contractual requirements. These may be adapted to be more restrictive for specific events. Personnel and participants whose expenses are funded by a specific grant or contract should refer to the terms of that grant or contract for guidance on what expenditures are



allowable. In general, those traveling on official ACP business will be reimbursed for all necessary and reasonable expenses of travel as hereinafter stipulated.

Stipulations specific to any sponsored projects may be additional compliance requirements.

Approval of Travel:

When authorizing and approving payment of travel expenses, management personnel:

- Must limit the authorization and payment of travel expenses to travel that is necessary to accomplish the project or program objectives in the most effective manner
- Should give consideration to budget constraints, adherence to travel policies, and reasonableness of expenses
- Should consider alternatives, including teleconferencing, prior to authorizing travel.

Formal pre-authorization of travel for ACP staff is not required

Travel Reimbursements:

All reimbursement requests must have original receipts (excluding airline tickets) or receipts in electronic format when approved by the Administrative Vice President, must be summarized and will be submitted to the ACP Administrative Vice President for approval within three weeks of travel.

Travel Costs:

- **Mode of Travel**

Transportation expenses shall be reimbursed based on the most economical mode of transportation that reasonably meets business travel needs. Travel by common carrier (air, rail, bus) is considered the most advantageous method to travel. Other methods of transportation may be advantageous only when the use of common carrier transportation would interfere with the performance of business or impose an undue hardship upon the traveler, or when the total cost by common carrier exceeds the cost by another method of transportation.

- **Air Travel**

All air travel will be reimbursed for economy class only. The participant will pay for upgrades. Exceptions to the economy-class-only rule are when economy class would:

- Require excessive circuitous routing
- Require travel during unreasonable hours
- Excessively prolong travel
- Result in additional costs that would offset the transportation savings
- Offer accommodations not reasonably adequate for the traveler's medical needs

The physicist or staff member must justify and document these conditions on a case-by-case basis in order for the use of upgraded airfare to be allowable in such cases. This applies to NSF-supported participants and those supported by any other ACP fund including, but not limited to the Shaham, Trustee and Simons Funds.



For multi-leg airline trips for two separate business purposes, ACP will pay half of the airfare with the above restrictions. If the only business purpose of the trip is for ACP and a personal leg is added, ACP will pay round trip airfare from the point of origin to the ACP-designated purpose. The personal portion of the trip will be paid by the traveler. To determine ACP's portion, the traveler will find the lowest possible round-trip ticket from the point of origin to the ACP-designated destination and submit that finding, along with the actual ticket for reimbursement.

Baggage fees for the ACP Admissions meeting are not allowable because it is a two-day meeting. Participant baggage fees are allowable because physicists attend ACP for a minimum of one week.

Foreign Travel and Fly America Act Compliance

An international traveler supported by a U.S. Federally sponsored award must use a U.S. flag air carrier or a non-U.S. flag air carrier under a code share arrangement for reimbursement for each international travel, according to 49 U.S.C. 1517, as amended by Section 21 of PL 96-192. When flying a non-U.S. flag air carrier under a code share arrangement, the ticket must identify the U.S. flag air carrier's designator code and flight number. U.S. flag air carrier service is deemed unavailable when:

- The U.S. flag air carrier does not fly to the traveler's destination
- Use of the U.S. flag air carrier or non-U.S. flag air carrier under a code share arrangement would extend travel time, including delay at origin, by 24 hours or more
- U.S. flag air carrier service or non-U.S. flag air carrier service under a code share arrangement is deemed unavailable when connecting service at an overseas interchange point would require a connecting time of four hours or more

If a U.S. flag air carrier does not offer nonstop or direct service, travelers must use a U.S. flag air carrier on every portion of the route it provides service unless such use would increase the number of aircraft changes by two or more, extend travel time by six hours or more, or require a connecting time of four hours or more at an overseas interchange point.

Before purchasing an international airline ticket for a participant or staff member with travel support from a U.S. Federally sponsored project, consultation with ACP staff is recommended as FAA compliance is complicated and research may be necessary.

Return of Unused, Partially Used and Exchanged Tickets

Travelers should be aware of the cancellation policies of their airline and notify the carrier in advance if they need to change their travel plans. Unused refundable tickets should be applied to the next scheduled trip with the airline or redeemed if purchased by the traveler; otherwise, The traveler will be held responsible for the cost of unused tickets or penalties incurred which may have been avoided by proper notification from the traveler

- **Automobile Travel**

Reasonable car rental charges for economy and standard/midsize vehicles are allowed when renting would be more advantageous to ACP than other means of commercial



transportation. Additional charges for upgrades are not allowed unless there is a specified business purpose for the upgrade, such as multiple employees traveling together.

Auto expenses can be expensed at cost or at the current government rate for reimbursing use of personal automobiles for Aspen Center for Physics business. The physicist or staff member seeking reimbursement must submit an accurate mileage tally to use for reimbursement if he or she is opting for the government-rate reimbursement. Rental cars and public transportation will be reimbursed at cost.

- **Other**

Rail or bus transportation may be used when required by the destination or by business necessity. The reimbursement for use of surface transportation in lieu of air travel, when not a business necessity, is limited to the lower of actual costs or regular coach fare available for the location of travel from a standard commercial air carrier.

- **Lodging**

Admissions Committee: In order to select the best physicists for its summer program, an Admissions Committee of eight to twelve physicists meets at the current ACP Scientific Secretary's institution. This entails accommodations for the Committee. Per NSF's AAG V.B. 8 rule, "Although local participants may participate in conference meals and coffee breaks as provided for in AAG Chapter V.C.5, grant funds may not be used to pay per diem or similar expenses for local participants in the conference." ACP defines local as within a twenty-minute commute of the Admissions Committee's meeting site. If the committee member lives farther than twenty minutes from the meeting site, he or she will qualify for housing and meal costs. An exception to this policy would be an individual's disability needs, which may be reviewed on a case-by-case basis. Travel costs will be reimbursed for locals at the rates as discussed in the Travel Policy section of this manual.

- **Meals and Incidental Expenses**

All ACP staff and Admissions Committee travelers will be reimbursed for their reasonable and actual expenses incurred for meals and incidental expenses. Itemized receipts are required. When an itemized receipt is not available, travelers may submit a brief explanation of why an itemized receipt could not be submitted, description of meal expenses, and a certification that no alcohol is included in the reimbursement request. Reimbursement for meals that are not supported by itemized receipts or alternate documentation will be limited to the maximum \$25 per meal. Forms for non-receipted expenses are available in the ACP accounting office.

This provision does not apply to physicists receiving support for their attendance at the Aspen Center for Physics.

Group/Shared Meal Costs

Reimbursement requests which include meal expenses for other travelers must identify the name and business affiliation of the other travelers. The cost must be reasonable for the number of participants, and if any charges for alcoholic beverages were included, they must



be submitted on a separate receipt, or clearly identified (including applicable taxes and tip) when a separate receipt is not possible.

Alcohol

The moderate purchase of alcohol for a group event or shared business meal may be reimbursed with prior approval of ACP management, but may not be charged to a Federal award.

Local Travel

Employees are allowed to claim only the amount over and above their normal commuting expenses (this includes transportation and meals). Exceptions need to be explained and documented.

Other

A claim for an unusual or uncustomary travel expense must be supported with an explanation of the need for the expense.

Allowable and Unallowable Travel-Related Costs:

Allowable Costs:

- Business office expenses (copy services, postage, etc.)
- Meetings and conferences, the primary purpose of which is the dissemination of technical information are allowable. This includes the cost of meals, transportation, rental of facilities, speakers' fees and other items incidental to such meetings or conferences

Reimbursement for meeting costs must be substantiated by the following, as applicable:

- The purpose of the event or the meeting
- The agenda for the topics of discussion at the event or the meeting
- A list of attendees and their affiliations

Unallowable/Non-Reimbursable Costs:

- Entertainment costs including amusement, diversion and social activities and any costs directly associated with such costs such as tickets to shows or sports events, meals, lodging, rentals, transportation and gratuities
- Fees for the use of fitness facilities
- Expenses related to vacation or personal days
- Loss or theft of personal funds or property
- Parking tickets or traffic violations
- Recreational expenses
- Spouse's or dependents' transportation, lodging and meal expenses
- Alcohol (non-reimbursable for other than approved group business meals)



Roles & Responsibilities

Principal Investigator: Responsible for understanding sponsor and ACP regulations and to ensure that costs are appropriately and consistently budgeted and applied to sponsored projects.

Administrative Staff: Responsible for approving and documenting transactions in compliance with this policy and for retaining documentation, justification and back-up for transactions. Responsible for using the appropriate Fund and Object Codes when charging costs to sponsored projects. Serve as a resource for the PI and travel support recipients on allowable costs.

Winter Organizers: Responsible for understanding compliance with this policy and applicable sponsor regulations.

Support Recipients: Responsible for understanding this policy in planning and organizing their travel and submitting reimbursement requests.

Applicable Federal Regulations & Criteria

ACP travel policies adhere to travel guidelines as stated in the NSF AAG and the OMB Circular A-122 as noted below:

51. Travel costs.

a. General. 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-profit organization. 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, 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-profit organization's non-Federally-sponsored activities.

b. Lodging and subsistence. Costs incurred by employees and officers for travel, including costs of lodging, other subsistence, and incidental expenses, shall be considered reasonable and allowable only to the extent such costs do not exceed charges normally allowed by the non-profit organization in its regular operations as the result of the non-profit organization's written travel policy. In the absence of an acceptable, written non-profit organization policy regarding travel costs, the rates and amounts established under subchapter I of Chapter 57, Title 5, United States Code ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter shall apply to travel under Federal awards (48 CFR 31.205-46(a)).



c. Commercial air travel.

(1) Airfare costs in excess of the customary standard commercial airfare (coach or equivalent), Federal Government contract airfare (where authorized and available), or the lowest commercial discount airfare are unallowable except when such accommodations would:

- (a) require circuitous routing;
- (b) require travel during unreasonable hours;
- (c) excessively prolong 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.

The non-profit organization must justify and document these conditions on a case-by-case basis in order for the use of first-class airfare to be allowable in such cases.

(2) Unless a pattern of avoidance is detected, the Federal Government will generally not question a non-profit organization's determinations that customary standard airfare or other discount airfare is unavailable for specific trips if the non-profit organization can demonstrate either of the following:

- (a) that such airfare was not available in the specific case; or
- (b) that it is the non-profit organization's overall practice to make routine use of such airfare.

d. Air travel by other than commercial carrier. Costs of travel by nonprofit organization-owned, -leased, or -chartered aircraft include the cost of lease, charter, operation (including personnel costs), maintenance, depreciation, insurance, and other related costs. The portion of such costs that exceeds the cost of allowable commercial air travel, as provided for in subparagraph] c., is unallowable.

e. Foreign travel. Direct charges for foreign travel costs are allowable only when the travel has received prior approval of the awarding agency. Each separate foreign trip must receive such approval. For purposes of this provision, "foreign travel" includes any travel outside Canada, Mexico, the United States, and any United States territories and possessions. However, the term "foreign travel" for a non-profit organization located in a foreign country means travel outside that country.

