



# TRAVEL POLICY FOR FEDERAL GRANTS

## I. Introduction

This Travel Policy for Federal Grants applies to all expenditures of funds received through federal grants, whether those funds come directly from a federal agency or through an intermediary, known as a “pass-through entity.” This policy applies to both domestic and foreign travel funded by federal grants. This policy does not govern expenditure of funds received from other sources (e.g. research foundations, alumni donations, etc.).

Federal law imposes particular requirements on the use of federal grants. This Travel Policy is designed to ensure the compliance of Concordia University (“Concordia”) with those requirements. Individual federal grants may contain further requirements that are unique to those grants and in addition to the requirements of this Policy. It is therefore important for Principal Investigators to work closely with the Office of Research and Sponsored Programs (ORSP) to ensure compliance with the requirements of each grant.

Failure to comply with federal requirements can result in a variety of adverse consequences, ranging from denial of reimbursement to debarment of Concordia from all federal funding, including federal student aid. In certain circumstances, criminal charges may also be brought. Therefore federal requirements must be scrupulously observed. **Violation of this policy may result in disciplinary action, including termination of employment.**

*This policy is consistent with Final Guidance issued by the Federal Office of Management and Budget on December 26, 2013 and effective as of December 26, 2014.*

## II. General

“Travel costs” are expenses for food, transportation and lodging incurred by Concordia employees in the course of their work for the University. Travel costs that arise from a federally funded project may be paid (or reimbursed) with federal funds at actual cost, on a per diem or mileage basis, or a combination thereof. Whatever method is chosen, it must be applied to an entire trip, rather than varied from day to day. For example, if an employee is traveling on a per diem rate for food, he or she would not be permitted to claim actual costs on those days when he or she exceeded the per diem allowance. In addition, expenses charged to federal grant funds must be consistent with Concordia’s standard travel policies. Please contact the Concordia Business Office for copies of that policy.

## III. Food and Lodging

The cost of food, lodging and incidental expenses may be paid (or reimbursed) with grant funds, provided they are i) reasonable, ii) incurred as part of a federally funded project; and iii) would be permitted under Concordia’s general travel expense policy.

In addition to standard evidence of actual expense incurred (e.g. receipts), the following documentation is required:

- That each individual billing expenses is necessary to the completion of the federally funded project; and
- a. That the costs are reasonable and consistent with Concordia’s standard travel policy.

## IV. Care for Dependents

Costs for temporary care of dependents that i) exceed regular dependent care costs and ii) directly result from travel to conferences, are allowable if the costs:

- a. Result directly from travel related to the federally funded project;
- b. Are consistent with Concordia's standard travel policy; and
- c. Are confined to the period of travel.

Note that this allowance is limited. It applies only to temporary costs arising from attendance at conferences, not to all travel that might arise in the performance of a federally funded project.

Travel expenses for dependents are generally not allowed, unless the travel is in excess of six months or prior approval is obtained from the awarding agency.

## V. Commercial Air Travel

Grant funds may be used only to pay basic, least expensive and unrestricted accommodations (commonly referred to as "coach class") offered by commercial airlines unless 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.

Whenever first-class or business-class fares are required to meet a traveler's medical needs, the reason for the additional expense must be documented in the file. Without documentation, such additional expenses may not be paid (or reimbursed) from federal funds.

The travel file must also be documented whenever fares in excess of the basic, least expensive rate are incurred (e.g. basic fare would have excessively prolonged travel or no basic fare seats were available on the date in question).

In addition, the "Fly America Act" requires that travel paid with federal funds be restricted to US carriers. Certain limited exceptions apply. Please contact the ORSP if suitable service is not available from a US carrier.

## VI. Ground Transportation

Ground transportation (automobile, bus, train) expenses may be charged when i) commercial air transportation is not feasible; or ii) the cost of ground transportation is equal to or less than allowable airfare.

## VII. Consequences of Noncompliance

Noncompliance can result in a variety of adverse consequences for Concordia, including:

- a. Temporary withholding of payments pending correction of the deficiency;
- b. Disallowance of all or part of the cost of the activity or action not in compliance;
- c. Complete or partial suspension of the federal grant;
- d. Loss of federal student loan funding;
- e. Suspension or debarment of Concordia from participation in federally funded programs;

- f. Withholding of further federal funding;
- g. Suit to recover funds paid for non-compliant activity(ies);
- h. Criminal prosecution.

**Failure to comply with these policies and procedures may result in disciplinary action, including termination of employment.**

**In addition, violation of federal requirements may expose an individual to civil and criminal prosecution.**