

Grant & Contract Accounting Office

Fund 145/146 External Grant/Contract Sponsored Travel

Travel plays an important role in many research and sponsored projects. This guidance is be utilized as a resource to faculty and staff on the best way to plan travel and to be reimbursed for associated costs.

All travel by faculty, staff, students, and guests utilizing sponsored grant/contract funds administered through Central Washington University (CWU) should adhere to institutional and state travel policies and procedures, except where sponsor requirements differ. Please check the terms and conditions of the grant/contract you will be using to make sure you understand what the sponsor requires for project-related travel. This includes ensuring that only travel directly related to the project is posted to the restricted grant/contract and that the travel costs are reasonable, allocable, consistent and acceptable by the sponsoring agency.

CWU designees with departmental travel cards are not allowed to incur travel-related costs (airfare, lodging or transportation) on external grants/contracts (fund 145/146 speedkeys that begin with 22XXXX0001). Please direct student travel requests to the Grant & Contract Accounting Office (x2302).

Travel sponsored by external grants/contracts should have copies of **all** receipts attached to the travel expense report if reimbursement is being requested. In addition, travel authorizations (TAs) and travel expense reports (TERs) should be approved by the traveler whenever possible, unless the traveler is a student or non-employee.

Travel sponsored by federal grants/contracts should have a justification on the travel authorization and/or travel expense report that states how the traveler's trip ties to the goals and objectives of the award or why participation of the traveler is necessary to the external award.

Domestic travel funded from federal awards are subject to the Fly America Act requirements mentioned below.

International Travel

Please review the guidelines listed below for international air travel before making any plans. Federally funded travel should follow the Fly America Act, which requires the use of U.S. Flag Carriers, regardless of cost.

In addition, individuals traveling internationally on university business need to be aware that export control restrictions may apply depending on their travel destination. Traveling internationally with certain types of personal items, information, or equipment (including but not limited to laptops, web-enabled cell phones, GPS units, scientific equipment and controlled, proprietary or unpublished research data) may require that an export license or other governmental approval be obtained before you depart.

Fly America Act

The regulations below concerning the use of foreign air carriers should be followed by all CWU personnel, students, trainees, consultants and collaborators who are reimbursed for air travel with federal or federal pass-through funds. It is the Principal Investigator's (PI) or his/her designee's responsibility to ensure that all air travel charged to federal or federal pass-through awards are compliant with this regulation.

It is highly recommended that all domestic and international airfare, which will be supported from a federal award, be booked through one of CWU's contracted external travel agents: Wright Travel 206.524.8524 or Travel Leaders 509.575.0292.

If airfare is purchased directly by a traveler that violates the Fly America Act, airfare may not be reimbursed from the federal award.

What is the Fly America Act?

The Federal Fly America Act mandates that travel sponsored by the Federal government must be on U.S. flag carrier or a foreign carrier that *code shares* with a U.S. flag carrier on the flight taken. *This includes flights within the United States.* If there is no U.S. flag carrier to your destination, you must travel on a U.S. flag carrier as far as possible. By law, additional cost for U.S. flag carrier flights is not a sufficient justification to fly on foreign carriers. Please note that the same rules apply to a foreign visitor's flights.

What is the Code Sharing?

If you are scheduling international travel that is federally funded, you are allowed to schedule international travel on foreign air carriers that code share with a U.S. Flag carrier. Code sharing occurs when two or more airlines "code" the same flight as if it were their own. In other words, a U.S. airline may buy a seat on the plane of a foreign airline carrier; this seat is considered the same as one on a plane operated by a U.S. flag carrier. Compliance with the Fly America Act is satisfied when the U.S. flag air carrier's designator code is present in the area next to the flight numbers on the airline ticket, boarding pass, or on the documentation for an electronic ticket (passenger receipt). This code indicates that the flier is in a U.S. Flag carrier seat, regardless of the air carrier, which owns the aircraft. ***The key to meeting the requirements is whether the ticket is purchased through the U.S. air carrier.*** If the ticket is issued through the U.S. air carrier the expense will, in most cases, be eligible for reimbursement, provided the U.S. air carrier is identified on the ticket. If the ticket is issued by a foreign air carrier, (even under a code sharing arrangement), the ticket is not eligible for reimbursement on a federal award.

For example, Delta has a code share agreement with Air France to Paris, France. If the boarding pass (flight coupon) or e-ticket identifies a flight as DL##, the requirements of the Federal Travel Regulations would be met, even if the flight was on an Air France airplane. If, however, the boarding pass (flight coupon) or e-ticket identifies the flight as an AF ###, then the requirements of the Federal Travel Regulations would not be met.

What are the generally permitted exceptions?

- No U.S. flag carrier provides service on a particular leg of the route (travelers may use foreign carriers to or from the nearest interchange point with a U.S. carrier, additional supporting documentation required).
- Use of a foreign air carrier is necessary for medical reasons (additional supporting documentation required).
- Use of foreign air carrier is required to avoid unreasonable risk to traveler's safety (additional supporting documentation required).
- Travel to and from the U. S., use of a foreign carrier is permissible if:
 - The airport abroad is the origin or destination airport, and use of a U. S. carrier would extend the total travel time 24 hours or more than would travel by foreign carrier; or
 - The airport abroad is an interchange point, and use of a U.S. Carrier would require the traveler to wait six (6) hours or more to make connection or would extend the total travel time six (6) hours or more than would travel by foreign carrier.
- Travel Between Points outside the U.S., use of a foreign carrier is permissible if:
 - Travel by foreign carrier would eliminate two (2) or more aircraft changes en route; or

- Travel by U.S. carrier would extend the total travel time six (6) hours or more than would travel by foreign carrier.
- **Short Distance Travel.** For all short distance travel, regardless of origin and destination, use of a foreign carrier is permissible if the elapsed travel time on a scheduled flight from origin to destination airport by foreign carrier is three (3) hours or less and service by U.S. carrier would double the travel time.
- When an Open Skies agreement is in place (European Union, Japan, Switzerland and Australia). Use of a foreign carrier is allowed when transportation is between the U.S. and any point in the agreement member state or between two points outside the U.S. provided that:
 - Funding is not provided by the Secretary of Defense or the Secretary of a military department.
 - No city pair fare exists (CWU travelers not subject to this provision)
 - For the EU agreement, a non-U.S. government employee traveler is exempt from the city pair fare requirement, i.e. a foreign carrier may be used for travel to any point outside of the U.S. but must land in an EU Open Skies agreement member state before traveling beyond the member states.
 - Note - the United Kingdom is no longer a part of the European Union so the use of a UK airline (e.g. British Airways), is not allowed unless you are using a different Fly America exception.

For further information regarding this exception, please contact the Grant & Contract Accounting Office x1988 for further guidance.

An informative PowerPoint from the U.S. General Services Administration (GSA) can be found at <https://finance.uw.edu/fm/travel/sites/default/files/Fly%20America%20Act%20%26%20Open%20Skies-%20SCTEM.ppt>.

If an exception is requested supporting documentation must be provided prior to approval being granted and ticket purchased.

For questions regarding international travel supported by federal awards, please contact CWU's Grant & Contract Accounting Post-Award Administrator x1988 or Travel Specialist x1986.