

Research Administration Practices (RAP) Sessions

Travel on Sponsored Programs

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Introductions

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Agenda

- Teamwork: people involved in Travel Expense Report Workflow
- Uniform Guidance, MIT Travel Policy, Sponsor and Agreement Travel Terms
- KC Award Travel Terms and Prior Approvals
- VPF Travel and Card Services
 - Concur Travel and Expense Reporting
 - Manual Audit by VPF
 - Potential Issues (and how to avoid)
- Interactive Scenarios

Teamwork: Sponsored Program Travel Planning & Expensing



Many people with varied roles play key parts in planning or expensing travel on a sponsored program.

We all play a part in ensuring that accurate information and guidance is available to help avoid errors.

MIT guidance: <u>Travel Terms by Sponsor</u>, <u>Traveling on a Federally Funded Award</u>, <u>Faculty and PI Travel Abroad Info session</u>, International travel: <u>VPR guidance</u> <u>VPF guidance</u>, and more!

Travel Planning & Expensing on Sponsored Programs





Travel Planning

Review the most important things you need to know before traveling on MIT business.



While You Are Traveling

Get help, change your itinerary, and access essential information during your trip.



Domestic Travel

Follow these guidelines to ensure your domestic travel goes according to plan.





International Travel

Traveling outside of the U.S. can take extra planning and coordination.

Today, we are going to focus on Travel Expense Reporting.

Ideally, guidance will be used during planning and travel to avoid errors detected during expense report review.

Pyramid of Precedence: Allowable Costs



Terms and conditions in the **Agreement** may restrict travel expenses or require prior approval. If the award is silent, check Agency Terms and MIT policy.

Agencies each implement federal regulations according to their own, agency-specific terms. See **Application of Award Terms** by Sponsor.

Agency Terms

MIT Standard Terms

Federal Regulations

MIT policy aligns with federal regulations and ensures that they are applied consistently across the Institute. MIT Standard Terms (apply unless Sponsor specifies otherwise).

Every federal award is subject to **federal regulations**, including **Uniform Guidance and the FAR**

Uniform Guidance

§ **200.475 Travel costs**.

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-Federal entity. 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-Federal entity's non-federally-funded activities and in accordance with non-Federal entity's written travel reimbursement 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 awarding agency or pass-through entity when they are specifically related to the Federal award.

- 1) Participation of the individual is necessary to the Federal award; and
- The costs are reasonable and consistent with non-Federal entity's established travel policy.

Traveling for MIT on a Federally Funded Award



When traveling on a federally funded award, please keep in mind;

- All items on a travel expense report must provide a direct benefit to the project.
- . The person traveling must be currently working on the project.
- Travelers should when to Kuali Coeus for any travel restrictions in place by the appraisor. Travelers unsure about allowable costs should contact their Research Administration Services (RAS) representative or RA-Helpflimit aduteriors booking travel or incurring any travel expenses.
- If a sponeor has specified terms that require a U.S. carrier, a United States Flag Carrier must be used.
- If a sponeor has terms that require an airline that is included in the Open Skies Agreement, only Flag Carriers of the countries listed in the Fly America Act may be used.
- Affire costs that are seinbursable under MIT policy but cannot be charged to a sponeor fauch as a business class sirine ticket, must be itemized and allocated. The economy rate obtained at time of booking needs to be itemized as airfare, and the difference needs to be itemized as airfare difference and allocated to a non-sponsored account.

For help navigating U.S. carrier requirements or the Open Stries Agreement, contact transituppor/libral.odu or MTI's preferred transf agency. The Transf Collaborative, at 617-497-7400.

Multipurpose Trips

Documentation is required for trips that have multiple purposes or include personal stays.

When booking travel for one trip with multiple purposes, a comparison quote must be obtained at the time of booking to show the exact striate for the sponsored-related portion of the trip. The quote must be attached to the superser sport in Concur.

Example: A traveler files to California for a traveley asseting with a sponsar, and then travels directly to a conference in fearite that is unsalated to the appresenced project. The traveler should, at the time of the booking, obtain a quote to show what the flight cost would have been if the traveler returned to Boston at the completion of the sponsace meeting. When negoriting expenses, this amount can be allocated to the appressor project. If a traveler arrives early to a sponsored-related event or delays their return for personal reasons, a comparison quote must be obtained at the time of booking to show the exact airliers for the sponsored-related portion. The quote must be attached to the expense report in Concur.

Example: A travelor provents research results of the operatored project at the IEEE Engineering in Medicine and Biology Society Continuouse in Hereat. The travelor steps as exits week in Hereat if the personal travel. The travelor should, at the time of the booking, obtain a quote to show what the flight cost would have been if he or she externed to Souton, at the completion of the spensor traveling When reporting expenses, this amount can be allocated to the spensored project. The Office of the VP for Finance and the Office of the VP for Research collaborated on a 2-page guide, <u>Traveling on a Federally Funded Award</u>.

Review the policies outlined in this guidance before scheduling travel for a sponsored award.

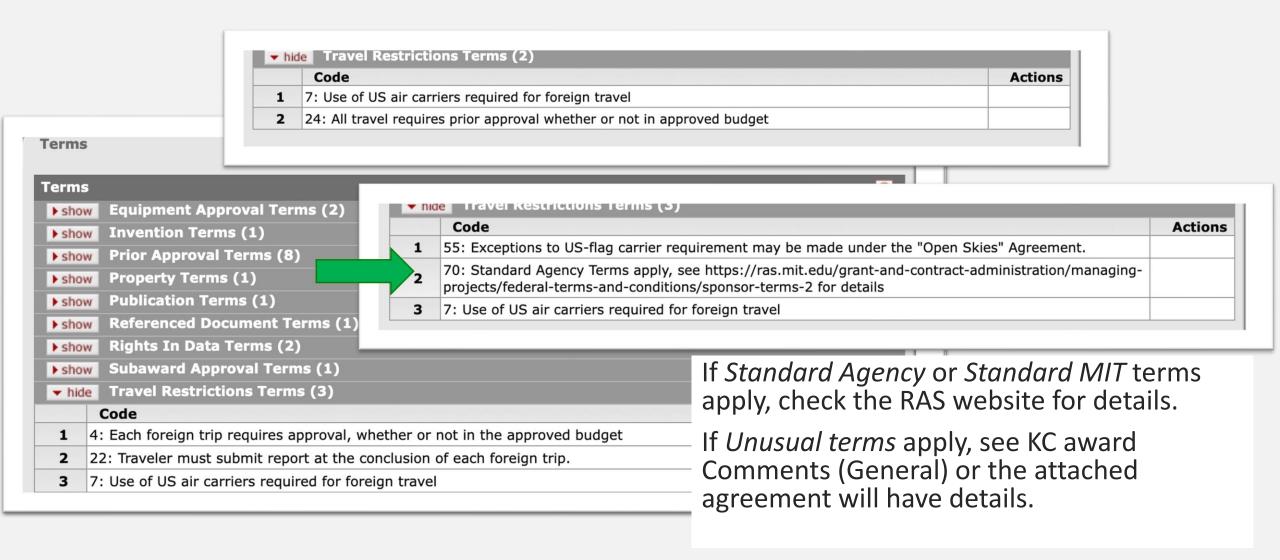
KC Award Search & Authorizations

Search by **Account ID** (SAP account), **Award ID** (KC assigned), or other fields. Actions are based on authorization assigned by your Primary Financial Authorizer in the MIT Roles Database (see KC Roles in Roles DB.

A person with *View Award KC* authorizations can view awards in any unit. Users need the *View Shared Award Documents KC* role to view shared attachments (EDS) in specified PC/Unit.

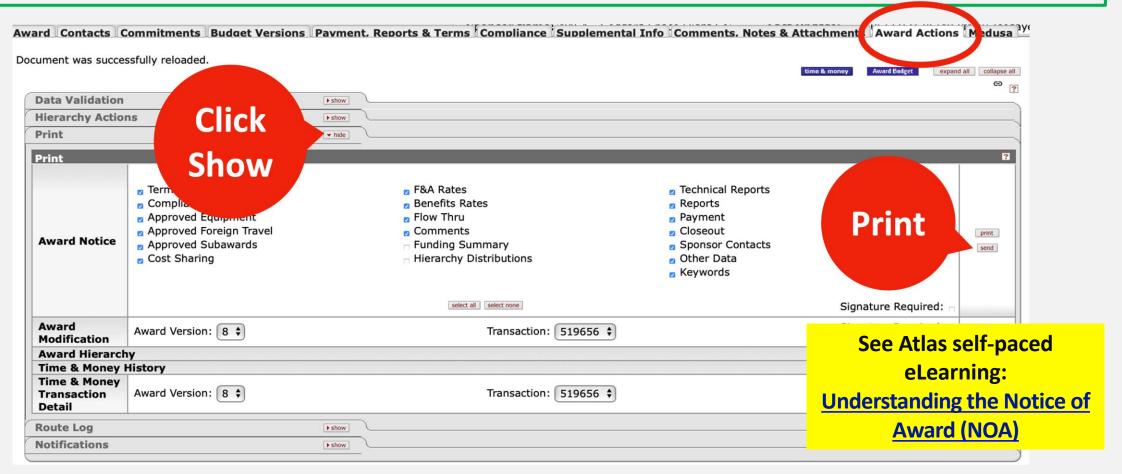
Actions	Award ID	Sponsor Award ID	Lead Unit ID	Lead Unit	Account ID	Award Status	Award Title	Sponsor ID	Sponsor Name	Investigator	OSP Administrator	Obligated Amount	Anticipated Total Amount
open copy medusa EDS	030561- 00001	80NSSC20K1012	159600	Kavli Inst for Astrophysics and Space Rsrh	6943009	Active	Continuing Development of Bragg Reflector Optics and Gratings for Pola	000420	NASA - Goddard Space Flight Center	Heine, Sarah Nicole Trowbridge	Goldberg, Jamie	208,679.00	421,109.00
open copy medusa EDS	028370- 00001	PHY-1836814	159600	Kavli Inst for Astrophysics and Space Rsrh	6939165	Active	Collaborative Proposal: The Next Generation of Gravitational Wave Dete	000500	NSF	Evans, Matthew J	Goldberg, Jamie	1,154,304.00	1,154,304.00

KC Award Terms: Travel Restrictions



Printing the NOA from KC

Print the Notice of Award (NOA) to a PDF from the KC Award Actions tab. Check Terms and Comments (for unusual terms and prior approvals).



Recommended DLCI Best Practices

Avoid errors: make travelers and team aware of restrictions

- Check KC NOA, Travel Terms, Prior Approvals (KC attached agreement if necessary)
- Inform team (traveler(s), Admin Assistant(s), Concur Cost Object Approver,) of travel terms and prior approval requirements in the award agreement
- Be familiar with:
 - Sponsor/Agency Research Terms and Conditions Prior Approval Matrix
 - MIT VPF Policies and Procedures
 - MIT RAS: Federal Sponsor Terms
 - Uniform Guidance Travel
 - Questions about allowability? Contact your <u>RAS Contract Administrator (CA)</u>

Ask yourself if the costs meet the factors of allowability:

- Is it allocable, reasonable, consistently treated?
- Does it conform with the terms, policies and regulations

MIT Guidance

When traveling on a federally funded award, please keep in mind:

- All items on a travel expense report must provide a direct benefit to the project.
- The person traveling must be currently working on the project.
- Travelers should refer to Kuali Coeus for any travel restrictions in place by the sponsor. Travelers unsure about allowable costs should contact their Research Administration Services (RAS) representative or RA-Help@mit.edu before booking travel or incurring any travel expenses.
- If a sponsor has specified terms that require a U.S. carrier, a United States Flag Carrier must be used.
- If a sponsor has terms that require an airline that is included in the Open Skies Agreement, only Flag Carriers of the countries listed in the Fly America Act may be used.
- Airline costs that are reimbursable under MIT policy but cannot be charged to a sponsor (such as a business class airline ticket) must be itemized and allocated. The economy rate obtained at time of booking needs to be itemized as airfare, and the difference needs to be itemized as airfare difference and allocated to a non-sponsored account.

For help navigating U.S. carrier requirements or the Open Skies Agreement, contact travelsupport@mit.edu or MIT's preferred travel agency, The Travel Collaborative, at 617-497-7400.

Fly America / Open Skies Agmts

- Federal sponsors require use of U.S. flag air carriers per the Fly America Act (49 USC 40118) for all air travel.
- There are some circumstances where it is not reasonable to use a U.S. flag carrier and some federal agencies allow limited exceptions to the Fly America Act. Exceptions are listed on the GSA website. They include when there is an applicable Open Skies Agreement in effect that meets the requirements of the Fly America Act. The GSA site provides a current list of active 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.
- Exceptions to Fly America must be documented in the travel reimbursement
- Dept of Defense does not allow Open Skies Exceptions

Knowledge Check: select all that are TRUE

For travel to be allowable as a direct charge to a federally funded award, what criteria are explicitly mentioned by the Unform Guidance? (check all that apply)

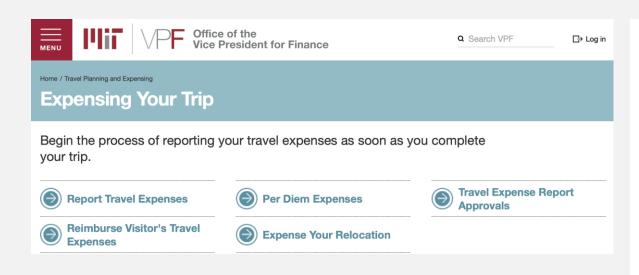
- a) Travel must be explicitly described in the award proposal or subsequent revisions.
- b) Travel of the individual is necessary to the Federal award.
- The costs are reasonable and consistent with the non-Federal entity's established travel policy.
- d) Individuals must be lawfully in the United States for domestic travel.

Knowledge Check: select all that are TRUE

For travel to be allowable as a direct charge to a federally funded award, what criteria are explicitly mentioned by the Unform Guidance? (check all that apply)

- a) Travel must be explicitly described in the award proposal or subsequent revisions: Incorrect. This is *not* a federal requirement.
- b) Travel of the individual is necessary to the Federal award: Correct.
- c) The costs are reasonable and consistent with the non-Federal entity's established travel policy: Correct. Note that this requirement establishes the basis that non-federal entities establish and maintain a written travel policy.
- d) Individuals must be lawfully in the United States for domestic travel: Incorrect. This is not a federal requirement.

VPF Travel



Contact info:

- Travel and Card Services staff directory
- travelsupport@mit.edu

Reach out to Travel Support to request small group or individual training travelsupport@mit.edu

Atlas eLearning:

- Introduction to Travel & Expense (Live)
- Travel Policies for the Traveler (Online)
- Travel Policies for the Approver (Online)
- ProCard: Cardholder Training (Online)

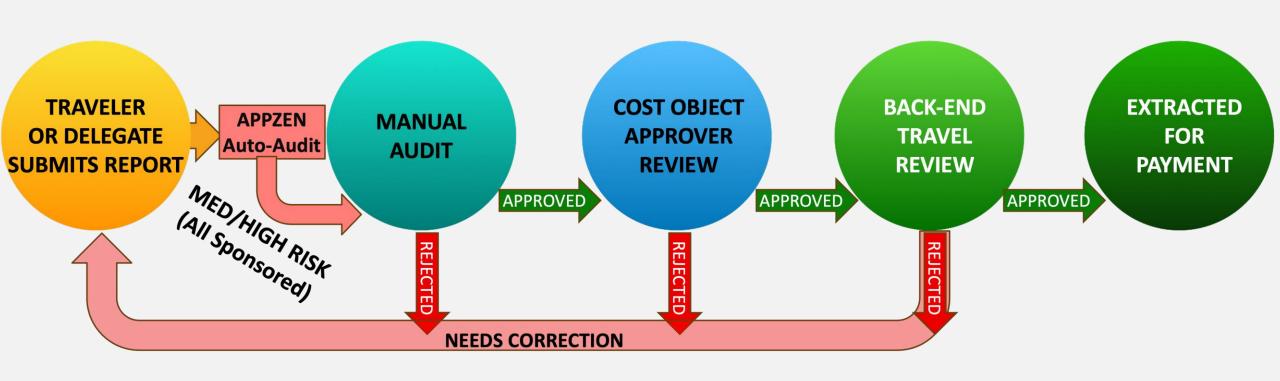
Traveler Report Submission & Review High Risk (All WBS Sponsored)

IN ACCOUNTING REVIEW

PENDING COST
OBJECT APPROVAL

APPROVED & IN ACCOUNTING REVIEW

APPROVED & EXTRACTED FOR PAYMENT



Traveler Report Submission in Concur



Atlas eLearning for Traveler or Delegate:

Travel Policies for the Traveler

Traveler or Delegate (e.g., Administrative Assistant) need to have **View Award KC** authorization in the <u>MIT</u> Roles Database to view KC Award terms.

Traveler/Administrative Assistants should work with the DLCI Fiscal Officer who manages the award to ensure all terms are met.

Must itemize and allocate travel expenses to the correct cost object(s) and upload required receipts or documentation.

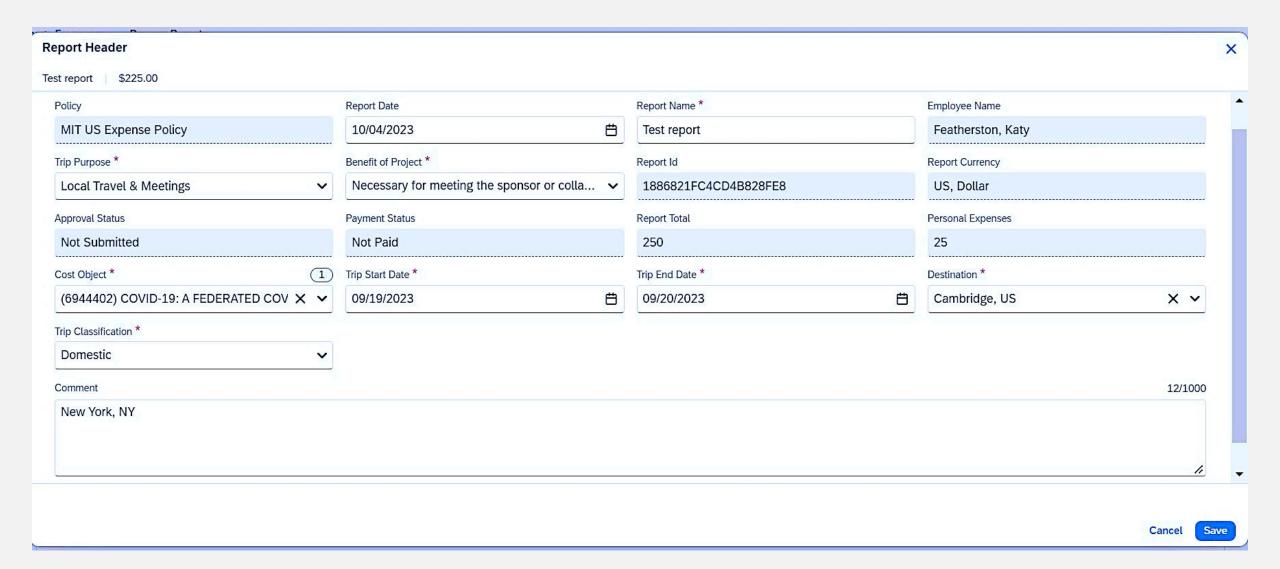
Manual Audit



The VPF Travel team reviews all sponsored (WBS) expense reports.

Travel team views KC Award Travel Terms and saves the applicable terms to the expense report.

Report Header



Project WBS Restrictions

Do not use funds from a sponsored project for the following:

Trip Purposes

- Fundraising
- Resource development
- Retreats
- Prospective student visits

Expense Types

- Alcohol
- Gifts
- Upgrade fees or airfare difference
- Entertainment other
- Non-recoverable expenses
- Misc. promotional expense
- Tips/Gratuities

Written sponsor approvals are required for exceptions to the above.

WBS Cost Object Roles



Roles DB Info on Cost Object

Cost object

Code: P6944402 (Project WBS) (Show position in Prof. Center/Cost hierarchy)

Name: Covid-19: A Federated Covid-Rich Icu Dat

Supervisor: Mark/Roger G E25-505 Addressee: Ketchen/Abigail R E25-510

Profit Center

Code: PC061901

Name: Institute For Medical Eng. And Science

Fund

Fund: F6944402 (Show position in Fund Center/Fund hierarchy)

Fund Center: FC209260

Miscellaneous

Rel. strategy: Model 4 (See more info. on P6944402 from Warehouse)

Start/end date: 09/30/2020 - 09/28/2023

Term. code: (none) (Show department and Primary Authorizers)

Company code: CUR

Admin. flag: FC (Faculty administered)

Who can: spend or commit report COUPA report approve invoice travel-approve Concur-approve on F6944402/P6944402?* (excluding people who are authorized on all funds/cost objects)

Who can perform Payroll-related functions?* Part 1 - by PCCS hierarchy Part 2 - by PMIT hierarchy

Concur Expense

Business Meetings

- Non-MIT attendees
- The purpose of the meeting or topic of discussion
- A list of attendees (names and affiliation)
- Itemized receipts

Meals (Breakfast/Lunch/Dinner)

All attendees must be MIT staff, faculty or students

Note: Alcohol must be itemized and charged to a non-sponsored account

Expense Reporting

Itemized receipts are required for all WBS Sponsored Accounts:

- Any expenses that exceed \$75.00
- All business meetings/meals regardless of cost
- All alcohol purchases regardless of cost

Dos Amigos Restaurant New York, NY										
SALE										
12-12-2014 10:32 AM Batch #:04A2A APPR CODE:3A6CE Trace: 9 VISA ****3429 1 Tacos Del Mal Shrimp 14.98 1 Especial Salad Chicken 12.50 1 Fountain Beverage 1.99										
Sub-total: 29.47 Sales Tax: 2.50 Total: 31.97 TIP:										
APPROVED THANK YOU CUSTOMER COPY										

No Itemized Receipt

Missing Receipt Affidavit

- If no itemized receipt is available, and an attempt has been made to obtain one, you should:
 - Fill out and attach a Missing Receipt Affidavit
 - Change the expense type to *non-recoverable expense*
 - If under a sponsored project, it should be allocated to a discretionary cost object
- Missing Receipt Affidavit form

Expense Reporting (Continued)

Itemizations

- Airfare / airfare difference
- Alcohol from any expense
- Meals from hotel expenses

Travel Insurance

- Not permitted
- One-time exceptions:
 - Require written AO approval
 - Update the expense to non-recoverable
 - If applicable: allocate to a non-sponsored account

Allowable vs Reimbursable

- Allowable = Federal Term vs Reimbursable = MIT term
- Costs may be "Reimbursable" by MIT but unallowable on awards when they adhere to MIT policies but do not meet the criteria of a direct cost on the sponsored award.

Examples:

Business class or first-class airfare: If charging federal award be sure to have documentation of what the economy fare is at the time of booking. The difference between coach fare and business class fare is unallowable on the sponsored award. By MIT policy, the unallowable portion is reimbursable from MIT discretionary funds.

Return to Submitter: Common Reasons

- Missing receipts/missing itemized receipts
- Business/first class airfare or upgrade fees not itemized
- Alcohol not itemized
- Benefit of Project (Report Header)
- Business Meeting/Meal vs. Meal (Expense type)
- Car/travel insurance not allowed
- Personal travel or detours from the original destination
- Meals on hotel bill need confirmation that no alcohol included
- Missing comments on miscellaneous expenses other fees, materials, incidentals

Returned to Submitter

On returns to submitter, the Travel team provides contact info for DLCI Financial staff administering the cost object and the RAS CA listed in the KC Award for assistance with the following:

- Prior approval requirement
- Term is Unusual requirement; See award for details
- Alcohol, Business meeting meal
 - KC Award may not list the term (e.g., meetings, meals, and beverage are allowed; does it allow alcohol?)

Pending Cost Object Approval

COST OBJECT APPROVER REVIEW

Atlas eLearning for Cost
Object approvers:

<u>Travel Policies for the</u>

Approver

If approved during Manual Audit, the expense report routes to the Cost Object approver.

The Cost Object Approver must confirm the following for sponsored travel:

- the trip benefits the award
- the traveler is allowed to travel on that award
- there is documented participation on the award
- travel occurred for the appropriate business purpose
- any expenses incurred fall within MIT, DLCI, and/or sponsor policies and guidelines
- no personal expenses are included on the report
- the appropriate cost object(s) are being charged

Sponsor Prior Approval Best Practices

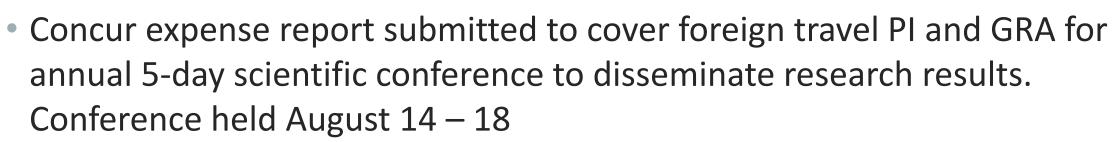
- Be specific in prior approval requests for travel dates, purpose, and traveler(s).
- If the PI/DLCI receives Prior Approval, send to RAS CA to have saved in KC Award Attachments
- Some sponsors have specific time windows in which prior approval must be obtained, examples:
 - Requests for approval should be submitted 30 days prior to the beginning of each foreign trip.
 - Requests for approval should be submitted 90 days prior to the beginning of each foreign trip.

Knowledge Check: Is It Allowable?

As Cost Object Approver reviewing the following travel expense submission:

Graduate Research Assistant

- Worked on 2-year NSF project until May 2023
- Graduated from MIT (MS) May 2023



Can the Graduate Research Assistant travel be charged to the NSF award?



Knowledge Check: Is It Allowable?

Can the Graduate Research Assistant travel be charged to the NSF award?

No

- The person traveling must be currently working on the project and the Grad RA graduated several months before the conference.
- There must be "documented participation on the award"- at MIT this is the payroll report which documents salary distribution to WBS cost objects for the sponsored award. For more info see VPF <u>Salary Certification Policy</u>
 - The Concur Cost Object Approver must confirm for approval
 - During an Audit, this documentation may be requested from the DLCI.

Knowledge Check: Where should the airline change fee be charged?

Change fee for last-minute flight change

- PI was booked to fly to London for a conference on February 6, 2024, to present NIH project findings.
- Before leaving for London, the PI changed the flight to accommodate a last-minute meeting at MIT for a different project and incurred a \$200 airline change fee.
- PI requested that travel agency change fee be charged to NIH award along with other travel costs.



Knowledge Check: Where should the airline change fee be charged?

Travel expense report was returned to submitter to confirm the change fee is allowable on this NIH award. Where should the change fee be charged?

- Charge to NIH sponsored account (no sponsor approval, but submitter noted that in 2020 NIH allowed change fees due to the COVID pandemic).
- PI must cover as personal expense. Change Fee cannot be charged to discretionary or sponsored account.
- Charge to a discretionary account. Other allowable travel costs may be charged to the NIH sponsored account.

Knowledge Check: Where should the airline change fee be charged?

Travel expense report was returned to submitter to confirm the change fee is allowable on this NIH award. Where should the change fee be charged?

- Charge to NIH sponsored account (no sponsor approval, but submitter noted that in 2020 NIH allowed change fees due to the COVID pandemic).
- PI must cover as personal expense. Change Fee cannot be charged to discretionary or sponsored account.
- Charge to a discretionary account. Other allowable travel costs may be charged to the NIH sponsored account.

Knowledge Check: Business Class

As Cost Object Approver reviewing the following travel expense submission:



PI flies Business Class due to back pain

- PI flew Business Class to Utah for meeting with collaborators on a DOD grant
- PI provided scanned copy of a note from his Primary Care doctor stating the PI has back discomfort
- KC award "agency standard terms apply"

Can Business Class flight be charged to DOD sponsored account?

Knowledge Check: Business Class

Can Business Class flight be charged to DOD sponsored account?

No

- VPF Travel will ask submitter for sponsor approval (checking KC Award Terms, DOD does not specifically allow business class on the award).
- Business Class for a medical reason requires documentation of a medical condition submitted for prior approval from the MIT Office of Disability (which is processed and recorded with VPF Travel)

Business Class

Travelers may fly Business Class (First Class if Business Class service is not offered):

- **Destination is outside North America** (defined as the continental U.S., Canada, Mexico, Bermuda, and the Caribbean Islands).
- Flight—or any segment of the round trip— has scheduled in-air flying time exceeds 6 hours.
- Medical purposes by providing proper documentation of a medical condition and receiving approval from the MIT Office of Disability Services.
- ■Travelers must itemize the lowest available coach fare at the time of booking and then provide documentation when submitting post-trip expense report.
- •Unless specifically allowed by the sponsor, the cost of Business Class/First Class may not be charged to sponsored projects.
 - lowest available coach fare charged to sponsored account
 - ■subtract the lowest available coach fare from the business class (or when acceptable, first class) fare and allocate the difference to a non-sponsored discretionary cost object

Knowledge Check: Air Carrier & Allocating Travel

As Cost Object Approver reviewing the following travel expense submission:

- Trip Purpose: Conference
- Cost Object: Sponsored Project funded Department of Energy Office of Science (Sponsor award terms require a US or Open Skies air carrier)
- PI flew American Airlines to Paris, France for conference
- PI then flew British Airways from Paris to London, England to visit
 - collaborator's facilities
- PI flew American Airlines from London to Boston



Are the three flights allowed on the sponsored account?

Knowledge Check: Air Carrier & Allocating Travel

Are the three flights allowed on the sponsored account?

- American Airlines is a U.S. Flag air carrier (an airline owned by an American company). These flights may be charged to the DOE sponsored award.
- The United Kingdom is no longer a part of the European Union, which has an Open Skies Agreement with the US, so the use of a UK airline, such as British Airways, is not allowed unless you are using a different Fly America exception. This flight is not allowed on the DOE sponsored award.

Note: Even when the traveler is in a foreign country and is traveling from one foreign location to another, U.S. Air carriers would still need to be utilized if available, regardless of cost or convenience.

Backend Travel Review and Extracted for Payment



EXTRACTED FOR PAYMENT

- Travel Team does final Backend Travel Review.
- When approved, the report is Extracted for Payment and fed to SAP. It may require manual processing:
 - An Error is generated
 - Account is in suspense
 - VPF Sponsored Accounting may need to open account for JV

Note: a late charge is higher risk for Audit!

Travel Training

- Travel Policies for the Traveler (Online)
- Travel Policies for the Approver (Online)
- ProCard: Cardholder Training (Online)

In Development

Concur Overview and Demo (Online)