Policy # FA 112: Business Travel and Entertainment

Responsible Department: Financial Affairs
Responsible Person: AVP, Procurement and Accounts Payable
Effective Date: September 2, 2016
Prior Revision Date: January 6, 2017

Policy Contents

1. Purpose
The purpose of this policy is to describe the parameters around travel arrangements for University business and for the reimbursement of such travel expenses.

2. Policy statement and applicability
This policy addresses payments for and reimbursements of business travel expenses. To be in compliance with IRS Publication 463, the employee must adequately account for expenses within 60 days after the expense was paid or incurred.

This policy applies to all University employees and contingent workers traveling on University business including travel that is sponsored or reimbursed by an outside entity.

3. Roles and Responsibilities
Employees:
Based on campus guidelines, employees should obtain approval of travel plans and anticipated expenditures prior to making final travel arrangements via the pre-travel approval process using the Spend Authorization task in the Georgetown Management System (GMS). Approval workflow will route to their supervisor and relevant fiscal officer(s).

Employees using sponsored or discretionary research funds for travel consistent with the research objectives and allowances do not need travel pre-authorization, but should submit a pre-travel registration using GMS Spend Authorization solely for funding corroboration. The spend authorization will route to the supervisor and grant manager.

The GMS Spend Authorization is also used to document the employee’s travel in compliance with the University’s
International Travel Policy, which has additional registration requirements if travel is not booked through the University’s preferred travel partner(s).

Employees are encouraged to utilize the University’s preferred travel partner (See Section 8.) when traveling for University business. As the price of airfare is impacted greatly in today’s market by many factors, early purchase is not always a guarantee of best pricing. The University’s travel partner will provide their professional expertise in securing the best pricing available for the specific time, date and route traveled.

If the preferred travel partner is not utilized, employees should make travel arrangements which are most cost-effective for the University by taking advantage of group and University discounts where available, making their travel arrangements well in advance, and incorporating Saturday night stays in the business travel plans if relevant discounts make such a stay more economical, when feasible. The employee should factor in the cost of the hotel room and meals for the additional time stayed to determine if the overall costs are still lower than the airfare without the Saturday night stay. Every effort should be made to pay travel expenses directly using University funds such as ProCard, or when possible University checks, in order to take advantage of the University’s tax-exempt status and having the applicable sales tax waived. Please refer to Section 8 for links to the purchase applicability matrix by state and the University’s tax exempt registration numbers by state.

Employees with a University ProCard with Travel & Entertainment privileges should use their ProCard for travel expenses in compliance with the documentation and reconciliation procedures as contained in the ProCard policy under Section 8. However, the procard should not be used for meals and incidentals when intending to claim per diem on a reimbursement request (section 5.7.c.) Failure to comply may result in the employee having to reimburse the University for unallowable or undocumented charges, in addition to card suspension and possible Human Resources/Academic disciplinary action.

Allowable business travel costs are clarified under Section 5. Policy Administration. If the employee is seeking reimbursement of travel expenses, the employee must adequately account for expenses within 60 days after the expense was paid or incurred. If expenses are submitted after 60 days, said expenses must be reviewed and approved by the campus CFO and the tax department. Travel that crosses fiscal years must be handled according to University fiscal closing deadlines for submission.

Financial Reviewer/Grant Manager:
Financial Reviewer/Grant Manager will ensure that the submitted receipts are in accordance with University policies and requirements from external sponsors, e.g. federal sponsors, etc. and that funding is available. If it is a reimbursed expense, they will also verify that there are no ProCard charges for the travel or per diem processed for the same expenses. If a per diem is requested, they will verify that there are no ProCard charges or reimbursed expenses processed for the same expenses.

Cost Center Manager:
Cost Center Manager will verify the business or research purpose of the travel.

Business Manager and/or Senior Business Manager:
Business Manager and/or Senior Business Manager will ensure that travel expenses and reimbursements processed are in compliance with University policy, external sponsors’ requirements, and that funding is available.
Accounts Payable:
Will reimburse employees for approved business travel costs timely, and in accordance with University and regulatory policies and procedures.

4. Policy Enforcement and Accountability
The policy is enforced by the campus Chief Financial/Business Officers, Senior Business Managers, and the Internal Audit Office. Additional reviews may be conducted by the University’s external auditors and/or agency specific auditors. If employees do not obtain the most feasible economical method of traveling, the departmental budgets and the University’s financial position may be impacted negatively. The University may opt not to reimburse an employee or only partially reimburse the travel costs if the employee fails to comply with the business travel policy, including not traveling using the most feasible economical method, failure to provide receipts and supporting documents, etc.

5. Policy Administration

5.1 Required Documentation for Reimbursement:
The employee or Expense Preparer, acting on behalf of the employee, should submit an Expense Report in GMS that is linked to the approved pre-travel spend authorization, when such authorization is required by the employee’s campus, and provide receipt(s) supporting the expenses incurred. The supporting attached receipts must be legible, complete, and unmodifiable.

a. Pre-trip Reimbursement: If the reimbursement is submitted prior to travel, the employee must submit supporting documentation confirming travel upon completion of the trip. When airline tickets are purchased in advance of the travel date, Accounts Payable will reimburse the employee prior to actual travel by following the procedures outlined in Section 6.

b. Proof of Travel: Dates of travel must be confirmed with supporting documentation. Boarding passes are only required for proof of travel if there are no other business-related expenses supporting the existence of the travel, e.g., hotel folio, car rental, etc. If a boarding pass is not available and there are no other business-related expenses supporting the existence of travel, then the supervisor may send a memo indicating the employee’s to and from destination and the specific travel dates, noting that the boarding pass was not available.

c. Unused Tickets: If a ticket was booked through the University’s contracted travel agencies and not used, the unused ticket is tracked and the credit is noted and reported to the University by the agencies on a monthly basis. These tickets can be reused by the same traveler, or by another traveler within the University/department. The reuse of the ticket may require a change fee.
   i. Unused tickets that were purchased using a ProCard are the ProCard holder’s responsibility to track. Documentation regarding the reason for the ticket cancellation must be attached to the monthly reconciliation documents as defined by ProCard Policy (See section 8).

d. Canceled Tickets: If a ticket is voided or canceled, the original paid amount (minus any fees if applicable) will be refunded to the original payment method (appropriate worktags, ProCard or personal credit card).
   i. If a trip is canceled based on reasons beyond the employee’s control, the employee may be reimbursed, subject to the approval of the Senior Business Manager. If not approved, a personal check payable to Georgetown University should be deposited by the department to the appropriate work tags.

e. Hotel Bills: Hotel bills submitted for reimbursement must include the traveler’s name. If a hotel room is shared, the employee must show proof of payment to the hotel along with a copy of hotel bill.

f. Expenses below $25: The University will accept submission of expenses, against non-sponsored funds,
without original receipts for reimbursement of travel expenses up to $25, subject to review. The total reimbursement without supporting receipts should not exceed an average of $50 per day.

g. **Lost Documentation:** Multiple occurrences of lost travel documentation may result in delayed reimbursement as the Chief Finance/Business Officer or Accounts Payable can elect not to process the requests for repeat violators until third party documentation (verification of travel from airline, etc.) is obtained.

h. **Companion Travel:** Individuals accompanying the University employees on business travel must travel at their own expense. If there is a difference in rates (fees per person or single and double room occupancy), the difference must be reimbursed to the University.

i. **Third Party (Non Grant) Funded Trips:** If travel is funded by a third party (such as another institution or University), the traveler should comply with the funding institution’s travel policies and follow their guidelines as to how to book the trip. If the traveler is going to be reimbursed by the third party after the trip, the traveler should use their own personal credit card (or cash) as payment method. If a ProCard or University funds are used, the third party must make the reimbursement payable to the University.

j. **Service contracts or consulting agreements:** University policy and guidelines must be followed. Expected travel expenses must be included on the associated Purchase Order. Detailed travel expense lines, and documentation (e-ticket, hotel folio, etc.) must accompany the invoice. For additional travel expenses not originally included in the statement of work, the purchase order must be amended and routed for approval.

k. **Business reimbursements other than Employees (Service contracts or consulting agreements, Volunteers, Lectures, Non Resident Aliens, etc.):** Business related travel expenses are treated the same as that of a University employee. A business relationship must exist and the individual must substantiate the expenses as outlined in this Policy. Reimbursements associated with a service contract or consulting agreement must be specified in the statement of work, and expected travel expenses must be included on the associated Purchase Order. Detailed travel expense lines, and documentation (e-ticket, hotel folio, etc.) must accompany the invoice. Business expenses maybe reimbursed even if the individual is not being remunerated for the services being provided. The amount of substantiated reimbursement is excludable from income under section 132(a)(3).

### 5.2 Group travel:

Group discounts should be utilized whenever accessible. It is recommended to work with one of our contracted travel agencies who might have access to group discounts. Group reservations must comply with the University’s bid policy as described by the Bid Policy FA#123. A contract is required for faculty led domestic and/or international student travel, or for local group travel that requires motor coaches or other types of transportation, space reservation, and/or entertainment, and must be reviewed and signed according to the Signature Authorization Policy FA#127. All faculty-lead student travel must be approved by the International Travel Committee as the first step of the trip preparations.

### 5.3 Duty of Care and iSOS Requirements:

The University is dedicated to providing medical assistance to its employees and students who are traveling on University business. iSOS is our contracted supplier to provide medical assistance and evacuations while on international travel. It is essential that employees and students register with iSOS prior to leaving the country so that the University may be able to fulfill its Duty of Care policy. Registration is automatic as long as the trip is reserved via our contracted travel agencies or using Georgetown Travel Online. For all other instances a manual registration is required on the [iSOS online portal](#).

### 5.4 Travel Accident Insurance:

The University's Travel Accident Insurance Policy covers faculty and staff traveling on University business at no additional cost to the traveler. If a traveler decides to purchase additional insurance, that expense is not reimbursable. (Except for Car Rental insurance, please see Section 5.5. f. for specifics.) The University
provides medical care and other benefits under Worker’s Compensation for those employees who suffer an injury, illness or death by an accident arising out of and in the course of their employment. If injured, please contact Risk Management at 202-687-7247 for additional information. Georgetown faculty or staff who obtain health benefits from the University can find information on the applicability of their benefits at the web site of the Office of Faculty and Staff Benefits.

Students traveling abroad can purchase health and medical emergency insurance through the University. Information on the various plans available can be found on the Student Health Insurance Website. Students who purchase insurance through the University should contact the GU Student Health Insurance Office to determine what emergency services are covered under their plans, and to determine who the primary point of contact is in the event of a medical emergency.

Depending on the nature of student activities a program sponsors, it may be necessary for both faculty and students to sign a release indicating that their participation is voluntary, that they understand the risks involved, and that they will abide by the University's code of conduct. Check with Georgetown's Office of Risk Management or Office of University Counsel regarding requirements for a release or assumption of risk.

5.5 Allowable Costs for Transportation:
Transportation expenses will continue to be covered at actual cost. Every effort should be made to plan ahead in order to obtain the best pricing available. Please note that:

a. Travel Agency: Every effort should be made to pay for travel expenses utilizing our preferred travel partner, using University funds such as ProCard, or when feasible University checks, to take advantage of the University's tax-exempt status and having the applicable sales tax waived. Please refer to Section 8. Additional Resources, Tax Exemption Status for Purchases by state and the University’s tax exempt registration numbers by state. Reimbursement of sales tax is at the discretion of campus policy.

b. Air Travel: The University prohibits the purchase of first-class air travel or equivalent at the University’s expense, unless explicitly allowed in the individual’s employment contract. The University allows business-class air travel or equivalent for international travel (off the continent) only, unless explicitly allowed in the individual's employment contract. The business-class exception applies to domestic legs of an approved continuous international literary (i.e., an itinerary to an international destination which includes one or more stops at domestic airports). If the traveler has an extended layover at a domestic destination (i.e. leaves the airport) before continuing on to an international destination, then the purchase of business-class air travel or equivalent is not allowed on the domestic leg.

c. Fly America Act: Travel on federal awards is governed by the Fly America Act, 49 U.S.C. § 41102, and its associated Open Skies and City Pairs agreements, OMB Circular A-21 § J.53 (for awards that were issued prior to 12/26/14 and are still operating under the Circular), and the Uniform Guidance, 2 CFR 200 § 474 (for awards that were issued on 12/26/14 or later). For more information on Fly America Act requirements, please see Appendix 1.

d. Rail Travel: The University prohibits first-class train travel or the equivalent at University expense unless the first-class train fare is more economical than the discounted coach airfare. The University does allow booking of Acela Business fares. Campus Finance Officers retain discretion to ensure budgetary compliance in their respective areas.

e. Limos: The University prohibits the use of limousines (defined as all chauffeured vehicles with the exceptions of taxis and airport/hotel travel vans, cars or buses) at University expense. The University permits the use of limousines by visiting dignitaries (e.g. members of the diplomatic corps, elected
officials, and individuals receiving honorary degrees) and Senior Level Executives receiving advanced approval and those with an explicit provision in their employment contract.

f. **Ground Transportation:** Employees should make use of airport/hotel travel vans, cars and shuttle buses where possible. Taxis, Uber X and Uber XL car services are allowed. UberPlus and UberBlack are not allowed.

g. **Car Rental:** It is recommended that individuals traveling on business trips that have a distance larger than 200 miles total (round trip) will rent a car instead of using their own vehicle. If the employee rents a car:
   i. It is recommended that University travelers book rental cars using our online travel-booking tool, Georgetown Travel Online, to take advantage of the University’s discount programs;
   ii. When traveling in groups, sharing of a rental car is encouraged to reduce cost to the University;
   iii. Fuel costs will be reimbursed based on receipt and actual purchase price not per mileage;
   iv. When using a University issued ProCard as method of payment within the United States, no additional collision damage insurance (CDW or LDW), personal accident insurance (PAI), and liability insurance supplement (LSI) should be purchased. If insurance is purchased, it is not reimbursable. However, if a traveler is using a personal credit card it is recommended to purchase additional insurance;
   v. Insurance should be purchased for all car rentals in international locations regardless of payment method and it is reimbursable;
   vi. For travelers below 25 years of age additional insurance might be required in certain states or by certain car rental agencies. If it is required, the insurance expense is reimbursable;
   vii. Receipts are required for car rental expense reimbursement requests and must be attached to the request in GMS.

h. **Mileage Reimbursement:** Mileage reimbursement should be accompanied by documentation showing valid business purpose and an electronic copy of proof of distance, stating departure and arrival point and total number of miles traveled. Mileage reimbursement requests must be submitted in GMS. The reimbursable amount is calculated using the federal mileage reimbursement rate (set by the IRS) in effect on the date of travel. This rate covers gas, oil, insurance, depreciation, and other maintenance costs of the vehicle. Tolls and parking fees are reimbursable.
   i. If the travel is for numerous trips within the DC/Maryland/Northern Virginia, paper and/or electronic mileage logs may be submitted for each trip. The header of the log should include the traveler’s name, date of completion/submission of mileage expense log, starting odometer, ending odometer, and total distance traveled. The body of the log should include the date of each trip, business/research purpose for segment of trip, starting odometer reading, starting address, ending odometer reading, destination address, and distance traveled.
   ii. If the traveler makes frequent trips by car to the same destination(s), the traveler may file the documentation of distance traveled with their departmental administrator or business service center. In this case, the mileage calculation does not need to be included for each reimbursement – the addition of a note on the transaction indicating that the mileage calculation is on file will suffice.
5.6 **Allowable Costs for Accommodation:**

Hotel expenses will be reimbursed on actual receipts for single occupancy. Short-term leases are allowed if they are less expensive than hotel stays. The traveler’s name should be on the supporting documentation. Please note that:

a. Contracted negotiated rates with hotels and other travel providers are accessible via Georgetown Travel Online or one of our Travel Management Companies (Short’s or Anthony).

b. Some units within the University may have also contracted negotiated rates with hotels in some destination cities. If this is applicable, the unit will notify the traveler in advance. If the traveler chooses not to use that hotel, then the allowable accommodation cost will be the lesser of the actual cost or the contracted negotiated rate.

c. If the traveler is traveling to a conference, then the allowable accommodation cost is equal to the negotiated conference rate.

d. Internet connectivity fees while on business travel are allowed.

e. Fitness expenses are allowed only if the trip exceeds 7 continuous days.

f. In-room entertainment is not a reimbursable expense.

g. Spa fees are not a reimbursable expense.

h. Laundry or dry cleaning expenses are reimbursable for trips of 7 days or longer. For per diems, laundry and dry cleaning expenses are considered an incidental expense and part of the per diem rate.
5.7 Allowable Costs for Meals and Incidental Expenses:
Employees will have the option of receiving a per diem or being reimbursed for actual costs for meals and incidentals for each trip. The University follows the Federal guidelines for per diem reimbursements.

a. **Per Diem:** The per diem option is not available for fundraising activities, and recruitment events and if the trip involves group travel or includes business meals (where 2 or more are being paid for). In these cases itemized receipts are for actual cost must be submitted for reimbursement.

b. **Documentation:** If the traveler opts for the per diem method, no receipts are required. Submission of the pre-travel approval through GMS Spend Authorization will suffice when such authorization is required by the employee’s campus.

c. **ProCard:** Meals and incidental expenses may not be charged to a University ProCard if the traveler is receiving a per diem.

d. **Payment of Per Diem Allowance:** The per diem allowance will normally be processed after return from travel. If the length of travel is more than 7 consecutive days, or in cases of financial hardship, then a request can be made to receive partial funds in advance of travel. If the per diem is paid in advance, the University’s travel advance policy, defined in Section 7, applies. The per diem may not be paid out more than 30 days prior to the trip.

e. **Calculation of Per Diem Allowance:** The University will follow the federal per diem rates and guidelines for travel within and outside the US. Current guidelines are as follows:
   
i. Individuals may only claim a maximum of 75% of the applicable per diem for meals and incidentals on the first and last day of their trip.
   
   ii. Meals and incidental expenses (M&IE) for domestic travel will be reimbursed in accordance with rates posted by the General Services Administration (GSA). See Section 8. for additional resources. Meals and incidental expenses for international travel will be processed as a reimbursement per Section 6.
   
   iii. The table for travel within the US lists separate amounts for breakfast, lunch and dinner. If the business travel includes meals, i.e., conferences or other business meetings or events, then the appropriate amount needs to be deducted from the per diem reimbursement.

   iv. Personal days taken during the business travel period are excluded from the calculation.

   v. If a University program has an approved, lower negotiated per diem rate, then that rate will supersede the University per diem rate. Documentation must be provided to substantiate the lower rate.

   vi. The traveler may request a per diem less than the allowable amount at their discretion. In this case, they must make that request in writing. Once processed, the decision is final and cannot be reversed.

f. **Actual costs for meals and incidentals:**
   
i. **Documentation:** If the traveler opts for reimbursement of actual costs, then original receipts must be provided. A reimbursement will not be approved without appropriate documentation.

   ii. **Comped meals:** The University will not reimburse for actual expenses for meals that are covered by registration or other fees paid for by the University. For example, if lunch is provided at a conference, reimbursement for lunch at another restaurant is not allowable. Per diems will be adjusted accordingly for comped meals.

   iii. **Incidentals:** Gratuities for meals, porter services, etc., are incidental expenses and are reimbursable as long as they are reasonable and appropriate for the services rendered. Typically tips of no greater than 20% are considered reasonable. For per diems, gratuities are considered an incidental expense and are part of the per diem rate.
6. Procedures
   a. **Pre-Trip Reimbursement**: The employee or expense preparer should submit an Employee Reimbursement request in GMS accompanied by (a) a receipt or credit card bill statement (with any information other than the relevant transaction marked out) showing the advance ticket purchase, and (b) a receipt from any paper copy or web page.

   b. **Reimbursements for guests**: In order for the University to reimburse guests, the guest has to be registered as a “supplier” in our Supplier Database and must have a Supplier ID in GMS. A [Miscellaneous Payment Request Form](http://financialaffairs.georgetown.edu/policytc.html) must be submitted to Accounts Payable with supporting documentation (e-ticket, hotel folio, taxi cab receipt, meal receipts, etc.), including documentation that specifies the event/purpose for the guest to be reimbursed. The request is paid after GMS approval per the Signature Authorization Policy FA# 127.

   c. **International Per Diems**: International per diems shall be processed as reimbursements, requiring proof of travel to international destination. The GSA International Per Diem rate table (See Section 8) is the table to be used for international travel, unless a lower rate is used pursuant to 5.7.e.v above.

   d. **Per Diems at less than the federal rate**: Per diems at less than the federal rate shall be processed as reimbursements, requiring proof of travel. In addition, the traveler needs to provide a statement verifying that they are requesting less than the full rate.

7. Definitions
   **Employee Reimbursement Request** – Travel or other reimbursement requests must be submitted by employees using GMS. The request will route for approval as described in the Signature Authorization Policy.

   **Travel Advance** – In certain limited situations it is allowable to request a travel advance in GMS. These requests are for pre-approved travel expenses that are provided to employees prior to the trip taking place. Travel advances must be entered in GMS by the employee. Once submitted they route for approval as described in the Signature Authorization Policy.

8. Other Resources
   - Main Campus Finance Office [https://provost.georgetown.edu/mcfo](https://provost.georgetown.edu/mcfo)
   - Medical Center Finance Office [http://finance.gumc.georgetown.edu/130784.html](http://finance.gumc.georgetown.edu/130784.html)
   - Law Center Financial Affairs [https://www.law.georgetown.edu/campus-services/financial-services/](https://www.law.georgetown.edu/campus-services/financial-services/)
   - University Services Finance Office [http://financialaffairs.georgetown.edu/](http://financialaffairs.georgetown.edu/)
   - ProCard Policy - [http://financialaffairs.georgetown.edu/policytc.html](http://financialaffairs.georgetown.edu/policytc.html)
   - ProCard User Manual - [http://financialaffairs.georgetown.edu/policytc.html](http://financialaffairs.georgetown.edu/policytc.html)
   - Approval/Signature Authorization Policy - [http://financialaffairs.georgetown.edu/policytc.html](http://financialaffairs.georgetown.edu/policytc.html)
   - University Authorized Travel Agencies - [http://travel.georgetown.edu/GTO-Instructions#gto](http://travel.georgetown.edu/GTO-Instructions#gto)
   - Georgetown Travel Services - [http://travel.georgetown.edu/](http://travel.georgetown.edu/)
   - State Sales Tax Exemption Numbers - [https://sites.google.com/a/georgetown.edu/tax/8-sales-tax](https://sites.google.com/a/georgetown.edu/tax/8-sales-tax)
   - Tax Exemption Status to Purchases by State - [https://georgetown.app.box.com/s/d4tmftbyf5p7y4sf0x6g](https://georgetown.app.box.com/s/d4tmftbyf5p7y4sf0x6g)
   - General Services Administration (GSA) Domestic Per Diem Tables [http://www.gsa.gov/portal/content/104877](http://www.gsa.gov/portal/content/104877)
   - International Per Diem Tables - [https://aoprals.state.gov/web920/per_diem.asp](https://aoprals.state.gov/web920/per_diem.asp)
   - Fly America Act - [http://www.gsa.gov/portal/content/103191](http://www.gsa.gov/portal/content/103191)
9. Review of the Policy
This policy is reviewed on a regular basis by the Director of Policy, Systems and Administration and the Chief Procurement Officer.

This policy was reviewed/approved by the following offices:

- Office of General Counsel
- Office of Financial Affairs
- Office of Risk Management
- Main Campus Finance Office
- Medical Center Finance Office
- Law Center Financial Affairs
- University Services Business Office
Appendix 1 – Foreign Travel

Generally, airfare charged to federal awards must be booked with a U.S. flag carrier, at coach or equivalent class, and at the lowest rate possible to the furthest airport to which a U.S. flag carrier provides service. U.S. flag carriers must be used even if the foreign carriers have lower prices. U.S. flag carriers may have code share agreements with foreign carriers. A code share agreement permits a U.S. airline to sell a seat on the plane of a foreign air carrier, i.e., a code share carrier. Many U.S. airlines have code share arrangements with foreign airlines. Proof of code share travel is indicated on the paper ticket stub, electronic ticket, or boarding pass by use of the U.S. carrier’s designator code and flight number. If a code share flight is booked, the paper (or electronic) ticket and boarding pass must specify the U.S. flag carrier’s designator code and flight number.

Exceptions to the requirement to fly a U.S. flag carrier when traveling from the U.S. to a foreign country are as follows:

- Flying a U.S. flag carrier will extend travel time, including delays at origin, by twenty four (24) hours or more;
- The U.S. flag carrier does not offer non-stop or direct service (no aircraft change) and flying the U.S. flag carrier will:
  - increase the number of aircraft changes outside the U.S. by two (2) or more; or
  - extend your travel time by at least six (6) hours or more; or
  - require a connecting time of four (4) hours or more at an overseas interchange point;
- There is no U.S. flag carrier serving a particular segment of your route. You may use a foreign carrier but only to the nearest airport that permits you to connect with a U.S. flag carrier.

Exceptions to the requirement to fly a U.S. flag carrier when traveling between cities in a foreign country, i.e., in-country travel, are as follows:

- The U.S. flag carrier does not offer non-stop or direct service (no aircraft change) and flying the U.S. flag carrier will:
  - increase the number of aircraft changes outside the U.S. by two (2) or more; or
  - extend your travel time by at least six (6) hours or more; or
  - require a connecting time of four (4) hours or more at an overseas interchange point;
- There is no U.S. flag carrier serving a particular segment of your route. You may use a foreign carrier but only to the nearest airport that permits you to connect with a U.S. flag carrier.

The Open Skies agreements provide additional exceptions to the requirement to fly a U.S. flag carrier when travel is between the U.S. and Australia, the European Union (including Iceland and Norway), Japan, or Switzerland unless there is a GSA City-Pair contract fare in effect (check https://cpsearch.fas.gsa.gov/). Note that the Open Skies agreements do not apply to Department of Defense (“DoD”) or any military agency, e.g., Army, Navy, or Air Force funded travel. Travel associated with DoD and U.S. military funded projects must be booked on U.S. flag carriers (or a code share partner as described above).