Travel Expense Policy

Effective Date: October 2006 Latest Revision: October 2020

POLICY STATEMENT

Columbia University faculty, staff, and students routinely travel out of town on behalf of the University or in support of sponsored research activities. The University reimburses these travelers for necessary and reasonable business expenses incurred while traveling. Reimbursable expenses must conform to federal and state law and the restrictions placed upon sponsored projects. Expenses charged on either a Business Travel Account or Corporate card must be reconciled. The University requires travelers to complete and submit an Expense Report, which must be approved, and documents the business purpose of the trip and the types of expenses incurred.

REASON FOR POLICY:

The travel expense policy:

- Assures that the University and the traveler are in compliance with Internal Revenue Service regulations that define the types of expenses that can be reimbursed without being counted as taxable income.
- Assures that travel charged to sponsored projects conforms to the regulations and restrictions placed on the use of the funds by the sponsor.
- Enables the University to protect its reputation and not-for-profit status by avoiding excessive or inappropriate spending.
- Provides departments with the ability to control how their budgets are expended.

PRIMARY POLICY TO WHICH THIS POLICY RESPONDS:

This policy primarily responds to the regulations of the US Internal Revenue Service, the rules established by the agencies and entities that sponsor research at Columbia and the federal and state laws that govern not-for-profit organizations. For more detail, please see appendix A.

RESPONSIBLE UNIVERSITY OFFICE

Ron Moraski, VP Procurement

REVISION HISTORY

Revised - 01/01/2020 Revised - 07/15/2020 Revised - 10/09/2020

WHO IS GOVERNED BY THIS POLICY

Any University traveler who seeks reimbursement for expenses incurred during approved University travel. Individuals other than employees or students (e.g., consultants, job candidates) who seek reimbursement from the University for Travel Expenses must also comply with this policy. **Due to budgetary constraints, some University departments have instituted more restrictive reimbursement guidelines.** In cases where there is a discrepancy between this policy and a department, granting agency or donor policy, the more restrictive policy will apply.

WHO SHOULD KNOW THIS POLICY:

The employee or student requesting reimbursement for business travel should know this policy along with:

- Senior Executive Officers, Provost
- Deans
- Senior Financial or Business Officers
- Chairs of Departments, Directors of Institutes and Centers
- Department Administrators
- Divisional Administrators with financial responsibility and oversight
- Program Directors
- Principal Investigators
- Faculty
- Students
- Post-doctoral fellows
- Graduate research assistants
- Junior Officers and Non-Officers with financial responsibility and oversight
- Administrative staff with significant travel responsibility

POLICY TEXT

Many members of the University's faculty, staff and students must travel out of town on University business. This includes travel to conferences, travel to meet with firms or individuals doing business with the University and travel to perform research. In such cases, the University will reimburse the traveler for necessary and reasonable expenses incurred while traveling.

Travel should be booked at the lowest logical cost and with as much advance notice as possible. The remainder of this section guides the traveler as to the kinds of expenses that may be reimbursed.

Due to budgetary constraints, some University departments have instituted more restrictive reimbursement guidelines. In cases where there is a discrepancy between

this policy and a department, granting agency or donor policy, the more restrictive policy will apply.

Roles and Responsibilities

The roles for expense reimbursement include:

The Traveler

The individual incurring the travel expense must be familiar with Departmental policies and this University policy in order to ensure compliance and prudent spending of University funds. Travelers whose expenses will be charged to a sponsored project must also be familiar with the particular expense restrictions of that project. The traveler is also responsible for obtaining all proper documentation for each expense. Typically, this documentation will be a receipt that identifies the expense and reflects proof of payment of the expense. Specific information regarding acceptable form of expense documentation is noted throughout this policy. The traveler is also responsible for documenting the business purpose or justification for each expense. This helps to document why the expense is eligible for reimbursement and should not be considered as taxable income.

The traveler should request reimbursement within 10 business days of the trip end date and must request reimbursement no later than 120 days after the date of the expenditure. Late submissions may only be reimbursed with the approval of the department. Supporting documentation must be provided in order to describe the circumstances leading to the late submission in order to evaluate whether it is a taxable event. If the circumstances described would not have prevented the traveler from submitting within the proper time frame (120 days), the reimbursement of these expenses are considered taxable income.

The traveler is responsible for completing the Expense Report in Concur accordance with University policy and procedure. If an individual other than the traveler prepares the Expense report, the traveler is responsible for providing the preparer with the appropriate information to complete the Expense Report for the accuracy of all information.

Preparer Delegate

In some departments, an individual may prepare Expense Reports on behalf of other employees in their area. In these instances, the Preparer Delegate is responsible for confirming:

- the nature of each expenditure and the business purpose for University reimbursement
- Completeness of documentation and accuracy of accounting
- Completeness and accuracy of the required information on the expense report.
- Allocation and segregation of expenses to the appropriate University account(s) and/or project.

Approver Roles

The Approver should be an Officer who is senior within the organization to have the authority to approve travel advances and expense reimbursements for faculty and staff in the School/Admin Unit. The approver may be the traveler's Supervisor, Financial Approver or Senior Business Officer. If the Payee does not have a Supervisor within Concur, the Payee must select an Initial Reviewer assigned to the administrative department. The Initial Reviewer will receive the Travel and Business Expense Reports and Requests (Pre-Trip & Travel / Cash Advance) for initial approval. Individuals with Senior Business Officer approval authority are in all instances ultimately responsible for the approval decision pertaining to policy exceptions.

Responsible and accountable for the Expense Report and Travel Advance request that they approve, certifying through approval that the travel is:

- appropriate
- valid
- policy compliant
- within budget

All requests for reimbursement must be approved by an individual with "Approver Authority" for their department(s). The approval of the Expense Report in Concur certifies that the expenditures comply with University policy and that they represent appropriate use of departmental or grant funds.

Regardless of the approver's authority, under no circumstances may an individual approve his or her own report.. Deans and V.P.s must have their reports signed by the appropriate approver.

If it is not feasible or practical for the most senior employee to pay for the shared expenses, then two steps must be taken to ensure compliance with University policy:

1. Shared expenses should be submitted on a separate Expense Report.

2. The most senior employee who attended the event is required to review the expenses to ensure they are valid.

As long as expenses have been validated, the employee may have their direct supervisor approve the Expense Report in Concur.

Key Compliance Matters

The IRS and Federal regulations require certain standards to be met when documenting, recording and submitting reimbursable expenses. These include:

- Submitting expenses for reimbursement within a reasonable time limit.
- Documenting the specific business purpose of an expense.
- Providing receipts and proof of payment.
- Segregating unallowable or excessive expenses.

Reimbursement Submission Time Limit

The IRS requires travel expense reimbursements to be reported within a reasonable period of time. The determination of a reasonable period of time will depend upon the facts and circumstances, but is generally held to be no later than 120 days after the date of the expense. In addition, in order to adhere to generally accepted accounting principles, the traveler should be mindful of the University's June 30th fiscal year end, and all expenses for that year should be reported prior to year end to ensure that the expense is appropriately captured in the financial statements and in the department's budget for the appropriate fiscal period. Expense Reports should be submitted to the department within 10 business days after return from the trip. Expense Reports must be submitted to the department NO LATER than 120 days after the trip end date. Reimbursements submitted more than 120 days after the trip end date require payee justification and Financial Approver acknowledgement.

If the Expense Report is submitted more than 120 days after the trip end date, the employee must provide justification for the late submission and this will require Financial Approver acknowledgement. Acceptable justification reasons in order to avoid imputed income include, but are not restricted to, the inability to submit a report due to medical reasons or being out of the country for an extended period of time with no internet access. The Executive Director of AP will review and determine if imputed income applies.

Expense Reports must be submitted within one year (365 days) of the trip end date for travel expenses. Failure to submit within 365 days will result in non-reimbursement of expenses.

Business Purpose

All expenses must be for a valid business purpose that is necessary and reasonable in order to conduct University business. A business purpose must be documented for all expenditures for which a traveler is reconciling or requesting reimbursement.

Business purpose must be specific. "Travel to Boston, MA to speak at Accounts Payable Network conference" is an appropriately documented business purpose. "Travel to Boston for conference" is not. **The business purpose of an expense may be obvious to the traveler, but not to a third-party reviewer.**

Receipts

The traveler is expected to obtain receipts for all expenses for which they plan to have reimbursed. A receipt may take many forms (i.e. cash register receipt, copy of an order form, web receipt or confirmation). A receipt must identify:

- the date of purchase
- the vendor name
- itemized list and unit price of the purchased items
- the total amount

If the traveler is unable to obtain a receipt that contains all the required information, documentation should be submitted to demonstrate as many of the required items as possible. A copy of the traveler's credit or debit card statement identifying the date, location and amount of the expense, or a rental agreement, may be submitted along with a description of the purchase, identifying the amount of any expenses to be segregated (e.g. alcohol).

Receipts must be provided for all air, rail, lodging, and rental car expenses. For all other expense types, receipts must be provided if the expense is equal to or in excess of \$50. Otherwise, payee justification is required and a Missing Receipt Affidavit must be completed.

Proof of Payment

The traveler is expected to obtain proof of payment for **any** expenses that require receipts (as outlined by our policy). Proof of payment may take many forms but must demonstrate that payment was tendered and must identify the means by which payment was tendered by the traveler. This is often part of the receipt. Examples of this may include notation of:

- "Cash Tendered"
- "Paid"
- A zero balance due
- Debit/Credit card payment (card type, last four digits of card and/or signature)

If no proof of payment is available in this form, a debit or credit card statement may also be provided. Please black out any private or unrelated information.

Segregated Costs

The Federal Government will not reimburse certain expenses, termed "unallowables" and has set forth guidelines prohibiting these costs from being charged to Federal grants and contracts, either directly or indirectly. These include expenditures for alcohol, entertainment, flowers or gifts or excessive costs, such as first or business class travel and lodging or meals over the designated University thresholds. To make sure that the University does not inadvertently charge any of these expenses to grants and contracts, "unallowable" expenses have been assigned to the appropriate account.

The terms "unallowable" or "segregated" do not mean that the expenses are not reimbursable, rather that they must be charged to a segregated account.

Arranging for Travel

If booked through any other means and not charged to the Business Travel Account or Travel & Expense Corporate Card, the traveler will be reimbursed for the cost of travel fare, and any agency booking fees and taxes based on the lowest logical fare.

Employees are encouraged to book travel through the University's Travel Management Company (TMC). There are numerous advantages to using a University preferred agency, including central pay for air and rail so that the traveler is not out-of-pocket for these expenses. The TMC is aware of University travel policies and reimbursement guidelines and will help select air carriers and hotels that conform to the policy, which speeds up reimbursement. Furthermore, the TMC often has access to discounts and preferential rates negotiated by the University. Finally, the TMC can help access and maintain the appropriate documentation of expenses. All travel agencies charge a per transaction service fee for ticket issuance.

If traveling to a group meeting or conference, inform the TMC about any available discount air and hotel rates offered by the conference or association meeting. If the TMC is restricted from booking at the special discount rate, the agent will inform the traveler how to make the booking.

Trip Cancellation Insurance

In special circumstances, it may be reasonable to purchase cancellation insurance. Before purchasing the cancellation insurance, the traveler should determine along with a Financial Officer if the purchase is warranted. Appropriate supporting documentation must be provided.

Tax-Exempt Status

The University is a tax-exempt organization and individuals should request that tax not be collected. Unfortunately, the travel industry (e.g., airlines, rail, hotel, car rental, etc.) frequently will not recognize this status and insist that taxes be paid. In these instances, the employee will be reimbursed for the taxes paid. If the supplier requests a tax-exemption certificate, this can be obtained through the <u>Finance Service Center</u>.

Air Travel

Domestic travel includes travel within the United States and its territories. All other destinations are considered international travel. When booking international air travel, both economy/coach and premium economy classes are permitted. Economy/coach class airline tickets should be purchased aboard a regularly scheduled commercial carrier. While some restrictions or penalties may apply, reservations should be made 14 days or more in advance of the trip to secure the lowest fares. For all travel (except for travel on a government grant):

- Carrier selection should be influenced by price (and not by the traveler's frequent flyer affiliation or other personal considerations)
- Travel on a US air carrier is preferred, but not required

Government sponsored grants require the traveler to fly on a US owned airline (Fly America Act). The US Flag Carrier Policy is available on the Research Administration website at http://research.columbia.edu/usflag-carrier-policy. Exceptions to this requirement are listed in the policy. If travel did not occur on a US carrier airline, the traveler must complete the Fly America Exception form and attach the form to their

Expense Report. The Financial Approver in Concur will be required to acknowledge the Fly America Exception Reason.

First or Business Class Travel

Travel must be booked utilizing the **lowest-priced logical non-stop economy class airfare** when the scheduled in-air flight time* is five (5) hours or less. Business class may be used for travel if your department's or school's financial approver confirms that appropriate funds are available (prior to purchase), and if any of the following conditions are met:

- Any flight segment has a scheduled in-air flight time* in excess of five hours.
 (Connecting flights involving at least one flight segment with a scheduled in-air flight time in excess of five hours may also be booked in business class).
- A documented medical condition which requires a reasonable accommodation that has been approved by the University's Leave Management office.
- If a flight meets the criteria for business class but business class is not offered (e.g. 2-class plane) the forward cabin will be considered business class, even though the ticket may be issued in first class. The traveler is responsible for documenting this exception on the Expense Report.

*Air time means the amount of time a traveler is continuously in the air on a single flight/leg.

If a traveler elects to fly in business or first class on a flight of less than five (5) hours duration, has not met the above mentioned conditions, and has not obtained the necessary financial approval, they will be reimbursed only for an amount equivalent to an economy/coach airfare.

Segregation of airfare above the economy/coach rate is required in all cases. First or business class airfare can only be charged to a government grant in cases where the grant explicitly allows such expenses. It is important to note that the cost of the lowest logical available economy/coach airfare when purchasing a business/first-class fare should be obtained by the traveler at time of initial purchase.

The amount above the economy/coach fare must be segregated to the appropriate expense type, a comparison of the coach/economy and business/first-class airfare costs must be provided, and payee justification is required.

Other Air Travel

Travel by non-commercial means (i.e. corporate jets, helicopter) is not allowed.

Documentation Required

The passenger ticket/receipt, boarding pass, e-ticket or website statement or confirmation, or itinerary issued by a travel agent, must include:

- the dates and points of departure and arrival
- the travel "class" (unless there is only one class on the airline, like Jet Blue)
- the total amount of the flight
- proof of payment

A traveler can be reimbursed in advance of a flight for an airline ticket if the flight was not booked through Concur / the TMC using the central pay mechanism. To seek reimbursement prior to travel, the traveler must purchase the ticket at least 14 days prior to an approved trip and submit proof of payment, a copy of the ticket or itinerary, along with the valid business reason. The "travel end" date on the Expense Report should reflect the return date of the trip.

Rail/Bus Travel

Rail or bus tickets should be purchased at the lowest logical available commercial/economy rate. The University expects that tickets are purchased at the lowest logical available fare. While some restrictions or penalties may apply, reservations should be made 14 days or more in advance of the trip to secure the lowest fares. If the traveler is traveling domestically in first-class, the traveler must provide justification that must be acknowledged by their financial approver. The traveler must segregate and provide a cost comparison for the amount above economy class if traveling domestically in first-class or business class (not including Acela). International rail travel does not require segregation regardless of class of service selected.

Documentation Required

The ticket, ticket stub or receipt for fares must include:

- the dates and points of departure and arrival
- the class
- total amount of the fare
- proof of payment

Ground Transportation

While traveling, it may be necessary to use multiple modes of ground travel. These include rental cars, taxis, private car services or personal vehicles. In all cases, the traveler should exercise reasonable judgment and either use a University preferred

supplier or choose the most economical ground travel option available. Travelers may use other services such as Lyft and Uber so long as the total cost of such services is comparable to other ground transportation options. Travelers need to be aware that there is no guarantee of safety when using such services.

Rental Cars

Reinbursement for car rentals may be for sub-compact, compact or intermediate/mid-size classifications for individual travelers. All authorized drivers must be listed on the car rental contract at the time of rental. Reimbursement will be made for larger vehicles in exceptional cases (i.e., several travelers in one car, equipment being transported, etc.), which must be documented. Travelers may be reimbursed for gas purchases for rental cars.

When using a University preferred car rental company in the Continental US, **do not** purchase Loss Damage Waiver (LDW) and/or Liability insurance from the preferred car rental company as the University has negotiated a separate agreement with the car rental company. Travelers will not be reimbursed for this expense if renting from the preferred University rental company. If renting from the designated University rental company in an international location only, the Loss Damage Waiver and Liability insurance must be purchased.

If the University preferred car rental company is not available, other car rental companies may be used. Loss Damage Waiver and Liability insurance must be purchased when renting from these agencies both internationally and domestically. In such cases, the University's auto policy will not cover damages associated with rental vehicles.

Expenses for GPS (Global Positioning Mapping) devices when renting a vehicle are reimbursable with a business purpose.

Documentation Required

The traveler must obtain and submit a receipt from the car rental agency that includes:

- the dates and points of rental
- the class
- total amount of the rental
- proof of payment

If a car is rented above the compact or intermediate/mid-size car rate, document the business purpose on the Expense Report that required the vehicle upgrade.

Travel by Private Vehicle

When traveling for business purposes, a personal vehicle may be used in order to save time, transport equipment, reduce costs when several people are traveling together, or travel to locations within reasonable driving distance. If a personal vehicle is used primarily for the convenience of the traveler and the approved travel is to a location more than 500 miles beyond the point of origin, reimbursement will not exceed the lesser of the following: 1) the cost of per- mile reimbursement plus tolls; or, 2) the round-trip airfare between the nearest commercial airport serving the origin and destination cities, plus transfer costs to and from the airport.

For the business-related use of a personal vehicle, the traveler will be reimbursed at a rate based on the Federal IRS approved highway mileage guides. Mileage reimbursement covers fuel, maintenance/repairs, insurance, transportation and operating costs, so these will not be reimbursed separately. The traveler will not be reimbursed for the cost of vehicle purchase or lease.

In addition to the mileage allowance, tolls and necessary parking charges may be reimbursed.

The University does not assume liability for damage to personal automobiles used on University business and does not assume liability for deductibles or any other uninsured loss to the vehicle. Expenses for vehicle repairs are not reimbursable. Under no circumstances will the University reimburse parking fines and moving violations on personal vehicle

Documentation Required

Travelers should keep a record (e.g., spreadsheet, notebook or ledger; AAA triptic or mapquest printout) of their use of their private vehicle for business travel. The written record should include:

- the dates and points (City, State) of departure and arrival
- business purpose of the trip
- total mileage
- calculation of reimbursement (total mileage * mileage rate)

Other Forms of Ground Transportation

Travelers will be reimbursed for bus, subway, or other mass transportation, shuttle, taxi fares, or private car service plus reasonable tips when necessary for business purposes. Reimbursement will be provided for transportation between hotels, railroad stations, airports, restaurants, workplaces or meetings.

Documentation Required

Travelers should attempt to obtain a receipt from the driver or transportation company. The receipts for fares must include:

- the dates and points of origin and destination
- passengers' names
- the total amount of the fare
- proof of payment

Lodging

The University will reimburse travelers for the cost of their rooms and any applicable taxes and fees when traveling on approved University business.

Domestic travel includes travel within the United States and its territories. All other destinations are considered international travel. When booking your lodging be cognizant of the thresholds applicable to either domestic or international travel.

The cost of a hotel stay in the US should not exceed \$350 per night (excluding taxes). International travelers should obtain room rates that do not exceed \$400 per night (US dollars, excluding taxes). Lodging costs in excess of \$350 per night in the US and \$400 per night in an International location (by no more than 50%) requires payee justification and Financial Approver acknowledgement. Additionally, lodging costs in excess of \$525 per night in the US and \$600 per night in an International location (more than 50%) requires Senior Business Officer approval.

If a conference is held in a hotel where the rate exceeds these amounts, please attach the conference flyer identifying the location of the conference and the offered hotel accommodations. If traveling on a sponsored project that is subject to GSA rates for lodging, the cost of a hotel above this amount must be segregated to the appropriate account.

Documentation Required

The traveler must submit an itemized hotel bill that includes:

- the dates of arrival and departure
- the detailed charges
- the total amount of the lodging
- proof of payment

Lodging in a Private Residence

Travelers who stay in a private residence with relatives or friends while traveling on business may be reimbursed for reasonable expenses incurred extending appreciation to hosts for their hospitality. This may include a small gift to the host or payment for meals, and should not exceed \$100. If the gift exceeds \$100, payee justification is required.

Documentation Required

The itemized receipts and proof of payment for any expenses incurred extending appreciation.

Rental Accommodations

Depending on the length of stay, it may be economical for the traveler to stay in a rental accommodation.

Documentation Required

The traveler must submit an itemized rental bill or agreement that includes:

- the dates of stay
- the detailed charges
- the total amount of the lodging
- proof of payment (zero balance folio)

Meeting and Conference Fees

Meeting or conference fees will be reimbursed by the University. It is preferable that either a P- card is used or the University is billed directly for these expenses. However, if the traveler pays the registration fee, they will be reimbursed.

Documentation Required

In order to receive reimbursement for a conference fee, the traveler must submit a flyer or other literature describing the conference, a registration form, agenda or receipt for the conference fees. The documentation must include:

- the dates and location of the conference
- the total amount of the conference fees

proof of payment

A traveler can be reimbursed in advance for conference fees paid. To seek reimbursement prior to travel, the traveler must submit proof of payment and a copy of the conference flyer or registration, along with the valid business reason. The "travel end" date on the Expense Report should reflect the return date of the trip.

Airline Baggage Charges (Baggage Fee)

When traveling by air, airlines may charge for a first or second checked bag. The University will reimburse that charge if the bag is needed on a business trip, or when traveling with heavy or bulky materials or equipment that is required for business.

If the trip includes business and pleasure and the bag is used for pleasure (golf clubs, skis, etc.), the extra charge is not reimbursable.

Miscellaneous Travel Expenses

In the course of travel, a traveler may incur additional expenses eligible for reimbursement. These include:

- Baggage handling and storage expenses
- Business office expenses (copy services, postage, etc.)
- Business-related phone calls (including cell phone), faxes, internet connectivity, including those necessary to obtain transportation and hotel reservations
- Up to 3 personal calls per day of reasonable duration
- Currency conversion, ATM and traveler's check fees
- Excess baggage fee due to the size or weight of an item being transported at the request of the University
- Reasonable and usual gratuities to porters, bellhops and other service personnel
- Internet access
- Vaccinations when traveling abroad on University business
- Laundry or cleaning expenses on trips lasting over five (5) days, unless emergency circumstances are documented

A list of non-reimbursable expenses can be found in Appendix B.

Documentation Required

Where appropriate, travelers should obtain and submit uploaded photos or scans of the cash register receipts for miscellaneous expenses. The receipt must include:

the date

- the items purchased or services provided
- the total amount
- proof of payment

Combination Packages

In order to save money, some travelers may consider booking a package (airfare, hotel, car rental) on a discount website such as Expedia, Orbitz or Priceline. Policies relating to airfare, hotel, and car rental continue to apply. The University designated TMC may also provide package deals and additional traveler support for changes and cancellations.

Group Travel Bookings

Reservation for blocks of Airline seats or Hotel Rooms, should be booked by Travel Arrangers using the Business Travel Account or Corporate Card and not a personal card.

Extending Travel beyond the Minimum Days Required for Personal Reasons

The costs related to an earlier departure and/or later return for airfare or rail fare may be reimbursed when the total cost of the airfare or rail fare is clearly documented and demonstrated to be equal to or lower than it would have been for the dates required for business travel. Payee justification is required on the Expense Report that documents the personal days in the itinerary.

The University will not assume the cost or reimburse the cost of lodging, local transportation, meals or other costs in excess of the minimum days necessary for travel or conference attendance. If the traveler does not have a legitimate business purpose for expenses (not including air or rail fare) incurred for their extended stay, all costs charged to either the University's Business Travel Account (BTA) or Travel & Expense Corporate Card will need to be reimbursed to the University. Out of pocket expenses will also not be reimbursed to the traveler.

Documentation Required

If air or rail expenses related to an earlier departure and/or later return are being reimbursed, the total cost of airfare or rail fare should be compared to the costs for traveling on the dates required for business travel. Documentation should include a price quote from either the air carrier and/ or rail carrier for the dates that would have been used if the travel was not extended. All documentation requirements for the specific expenditure type apply.

Use of Frequent Traveler Awards for Travel

Travelers will not be reimbursed for airline tickets purchased, partially purchased or accommodations and upgrades obtained using frequent flyer miles. Travelers will not be reimbursed for credits issued by an airline from personal travel used to purchase airline tickets for business travel.

Use of Credit Card and Airline Reward Programs/Points

Travelers will not be reimbursed for airline tickets purchased, partially purchased or accommodations and upgrades obtained using credit card or airline points.

Expenses to Change or Cancel Travel Plans

The University will reimburse the costs of travel purchased (i.e. airfare, deposits) or surcharges imposed due to cancellations or changes in travel arrangements only when required for business needs.

Meals

The University reimburses employees for meals during travel on University business.

Business Meals

Business Meals are reimbursed on an actual or per diem basis and include:

- The cost of breakfast, lunch or dinner eaten by an individual traveler while away from the University on approved business travel.
- Reasonable and necessary meal expenses for business meetings involving only University personnel and students during which focused business discussions take place. The frequency of such meetings and the related expenses must be reasonable and appropriate to the purpose of the discussion and the nature of the business conducted. Such meetings include:
 - Breakfast, lunch and dinner meetings which are necessary to conduct University business.
 - Formally organized meetings which are necessary to carry out the business of official committees appointed by the University, School or Department.
 - Meetings of an organized work group of employees or students that require the work of the group to progress through normal meal time.

 Reasonable and necessary meal expenses for peer groups for research collaboration or administrative meetings during which focused business discussions take place.

Except under rare circumstances, these meals to be reimbursed or meals to be paid via invoice directly to the vendor should not exceed the following thresholds, excluding tips and tax:

- Up to \$25 for breakfast
- Up to \$35 for lunch
- Up to \$75 for dinner

Senior Business Officer approval is required when business meal expenses exceed the individual pre-tip, pre-tax meal thresholds (\$25 for breakfast, \$35 for lunch, \$75 for dinner) and the amount over the threshold must be segregated.

These thresholds are not per diems, and should not be charged as such. Travelers must submit individual receipts showing the actual cost of each meal.

Business Meals Hosted by CU Involving Certain External Parties

The University will pay for approved, necessary and reasonable business meal expenditures that are hosted by and paid for by a CU employee and include guests, business colleagues, donors, and prospective employees which results in a business benefit to the University. Examples are limited to fundraising, recruitment, and recognition of a speaker. These may occur either locally or during out of town travel.

Senior Business Officer approval is required when business meal expenses exceed the individual pre-tip, pre-tax meal thresholds (\$25 for breakfast, \$35 for lunch, \$75 for dinner) and the amount over the threshold must be segregated.

The cost of alcoholic beverages consumed during a meal may be reimbursed. However, the cost may not be charged to a sponsored project and must be charged to a segregated account. In addition, reimbursements for business meals that meet the following criteria require segregation to the appropriate account:

- Reimbursement for business meals that require attendance by an employee's spouse, significant other, and/or dependent require payee justification and Financial Approver acknowledgement.
- Expenses for business meals conducted in private homes

Documentation Required

The restaurant or cash register receipts for business meals must be obtained and scanned copies submitted with the payee's Expense Report. The receipt must include:

- the date and location
- the type of meal (breakfast, lunch, dinner) indicated by the payee
- the meal items purchased (identify alcohol)
- the total amount of the meal
- proof of payment

The cost of alcoholic beverages may not be charged to a sponsored research account and must be segregated to the appropriate account.

A list of attendees (or a number, if there are more than 10 names), the relationship to the University, and the business purpose of the meal must also be clearly documented.

Use of Per Diems for Meals

Per diems may be used for instances of domestic and international travel. If a per diem is to be claimed, the traveler must select per diems for the duration of the same day of the trip (i.e. cannot alternate between per diem and actual receipts for the same day). Use of per diems and actuals for meals on the same Expense Report require payee justification. A per diem may not be used on business trips where there is not an overnight stay, actual receipts should be utilized in these instances. The per diem must be claimed in accordance with the government's published per diem rate for Meals and Incidentals Expense Rate (M&IE).

In cases where per diems are allowable for travel under the terms of a grant, the department or traveler may provide any of the following forms of documentation:

- A copy of the section of the grant award/budget demonstrating that it allows per diems, or written approval from the granting agency
- Written approval from the departments' Sponsored Projects Administration project officer authorizing the expenditure

Reimbursement for Travel Expenses of Spouses, Significant Others and Dependents

In most circumstances, the University will not reimburse transportation, lodging and meal expenses for a traveler's spouse, significant other, or dependent. Reimbursement may only be allowed in limited circumstances when the travel by the spouse, significant other or dependent is:

 Required by the University for a specific business event or meeting related to "R&R (Rest & Recuperation)" travel allowable under the terms of a sponsored project. Payee justification and Financial Approver acknowledgement must be provided.

Departments that choose to reimburse spousal, significant other, and/or dependent travel without a legitimate business purpose should inform the traveler that the reimbursement for the non-employee travel will be taxable income to the employee and will be reported to the IRS.

Employee Recruitment Travel

Travel for prospective employees and their families must be authorized by the school or department in order to be reimbursed. Reimbursements for authorized travel expenses such as airfare, hotel, and meals incurred during the recruitment process are not taxable to the prospective employee.

Once an offer of employment has been accepted, departments and schools should refer to the Relocation and Moving Expenses section of the Business Expense policy.

Emergency Purchases of Supplies/Equipment during Travel

The University requires that travelers use the proper designated purchasing path to purchase supplies and equipment. A traveler may occasionally have to incur expenses for an emergency purchase of supplies or equipment. The traveler will be reimbursed for these emergency expenditures under \$500. Expenditures in excess of \$500 will not be reimbursed unless the traveler provides justification and obtains Financial Approver acknowledgement. Expenditures in excess of \$2,500 that ordinarily require a Purchase Order will not be reimbursed without approval from Purchasing.

Although the University is exempt from sales tax, if taxes are paid on an emergency purchase during travel, the traveler will be reimbursed. Where possible, the traveler should request tax exemption.

Sales Tax

Cardholders should remind vendors at the time of purchase that according to the tax laws in some states, the University is exempt from sales tax. For a list of states that honor the University's tax-exempt status please contact the Finance Service Center at 212-854-2122. The University's tax exempt number is printed on the T&E Corporate Card and Cardholders should keep a copy of the tax-exempt form with them to present to the vendor at the time of purchase. To request a copy of the University's tax-exempt form, please contact the Service Center at 212-854-2122. If a Cardholder is charged

sales tax for a T&E Corporate Card purchase that should be tax-exempt, the Cardholder should contact the vendor directly and request a Credit.

Travel Accident Insurance

The University's Business Travel Accident Insurance policy provides coverage for all active, full time employees and graduate and teaching assistants. Employees covered by a collective bargaining agreement are excluded from coverage, unless the agreement specifically provides for coverage under this policy. Supplemental insurance is not necessary and will not be reimbursed. Coverage is provided on a 24-hour basis while traveling on a business trip, away from the employee's place of regular assignment. Commuting to and from work is excluded from coverage.

Full time employees are provided coverage while on paid leave only while doing research under a project financed by another institution. Faculty members of the University are provided coverage while on sabbatical provided such arrangements have been made by the Provost's Office. Coverage during the summer vacation is excluded unless the individual is receiving additional compensation from the University during that time or the travel is paid by the University. Coverage is also excluded if the individual is employed by another institution while on sabbatical.

Coverage is further subject to the terms and conditions of the University's insurance contract. Specific details on insurance coverage are available through the Risk Management Department.

Reimbursement of Individuals Other than Employees and Students for Travel

A department may choose to reimburse an individual other than employees and students for travel, including:

- Prospective employment interviewees
- Lecturers, Guest Speakers and other official visitors
- Consultants

These individuals **must be informed of the University's travel policies in advance** of their travel. Expenditures that do not comply will not be reimbursed and are not advanced prior to the trip. These expenses must be supported by documentation, as they are subject to 1099 reporting if not supported.

For non-US residents, a copy of Form I-94 or the passport page with the visa entry stamp must be provided prior to reimbursement. The University must ensure the individual is eligible to be reimbursed based on the visa type, in accordance with the chart at: https://finance.columbia.edu/content/visa-payment-salary-eligibility-chart

If the department is reserving hotel accommodations for the visitor using a local hotel property, the individual should identify themselves as being with the University or by providing the identification number. A list of local hotel properties is available on the Purchasing Office web at: //finance.columbia.edu/content/travel-services-local-preferred-hotel-rooms-university-guests-and-visitors

Documentation Required

The department should document the business purpose for which the individual's travel is being reimbursed. Reimbursement requests must be accompanied by a copy of the I-94 or passport page with the visa entry stamp (if for a non-US resident), a listing of each expenditure by expense type (e.g., travel, lodging, meals, other) and the appropriate receipts and proof of payment. Details must be provided to ensure that expenses are appropriately segregated.

Travel Advances

Subject to departmental approval, a traveler (only an employee or student of Columbia University with an active Concur profile) may request an advance to cover out-of-pocket, incidental expenses while traveling. Requests for individuals who do not have an active Concur profile must be completed and reconciled by an individual who has an active Concur profile. Any advance should be requested within a reasonable period of time (10 to 20 days) before the official business trip. A travel advance is meant to cover expenses that cannot reasonably be charged to a credit card.

The following circumstances may require a travel advance:

- International travel
- Travel by teams or large groups
- Travel for recruiting purposes

Requests for travel advances must include a description of the circumstance that would require the advance and an itemized budget of expected expenses.

Reconciling a Travel Advance

A travel advance should be reconciled within 20 working days after the completion of a

trip. Each outstanding travel advance must be reconciled before a new advance will be issued. There are two exceptions:

- When the second trip is within five working days of the first.
- When the advance is serving to fund programs or research start-up operations.
 Please note: A traveler must reconcile an outstanding travel advance before they will be issued any reimbursement, whether it be for travel or for another business-related expense.
 - Upon termination of employment, all employees must promptly reconcile all outstanding advances

Reconciliation of Travel Advance

An email reminder is sent to employees and their supervisor/department if the cash advance is not reconciled within 60 days of the trip end date, and reminder emails will be sent weekly until the cash advance is reconciled.

Travel advances must be reconciled within 90 days of the end date of the business activity. For awards issued by both government and non-government sponsors, the timeline for reconciliation of expenses and reporting may be more constraining or restricted per project rules. In addition, individual schools/departments may issue a shorter timeline for reconciliation of advances. In these cases, please follow the award or school/department guidelines.

If the travel advance is not reconciled within 120 days of the trip, the traveler should be advised the following will occur without additional notification:

- Suspension of travel advance privileges
- The reporting of the advance as income to the IRS on the traveler's annual Form W-2
- Withholding of taxes on the advance from the traveler's paycheck
- Employee continuing to be responsible for clearing the advance in order to have this properly charged to the department

If the actual expenses are less than the advance, the traveler must reimburse the University for the unused advance via a personal check deposited to account 65399. The personal check can either be deposited by the department using their RDC (Remote Deposit Capture) machine (if the department has one) or deposited via the Payments & Deposits Office https://sfs.columbia.edu/departmental-deposits

CROSS-REFERENCES TO RELATED POLICIES

Business Expense Policy: http://policylibrary.columbia.edu/business-expense-policy
If any URL in this PDF document does not open into a webpage, please copy and
paste the URL into another web browser window. You may also choose to save the
PDF to your computer and open it with the most recent version of Adobe Acrobat:
http://get.adobe.com/reader/. For further assistance, please call the CUIT Service Desk
at 212- 854-1919.

<u>APPENDIX A -- Regulations to which this Policy Responds</u> IRS Guidelines

In order for travel advances and reimbursements of travel and business expenses to be excluded from an individual's taxable income, the University's policies must meet the IRS definition of an "accountable plan" with the following four requirements:

- Advances and reimbursements must be made for business expenses only and must be necessary and reasonable.
- A *necessary and reasonable* expense is one for which a clear business reason exists and for which the cost is not excessive.
- Travelers must submit an Expense Report in Concur substantiating the amount, time, and business purpose of expenses within ten working days after the expenses are incurred. Receipts (photographs or scanned copies) must be submitted with the Expense Report.
- Employees must return any advance amount in excess of substantiated expenses within ten working days after the completion of the trip.

To meet these requirements, individuals must submit an Expense Report in Concur and provide documentation to substantiate the expenditures. The documentation must provide:

- Detailed documentation of the purchase
- Documentation of the business purpose of the purchase
- Proof of payment

Federal Guidelines

The Federal Government will not reimburse certain expenses and has set forth guidelines prohibiting these costs from being charged to Federal grants and contracts, either directly or indirectly. In order to meet these requirements, University travelers must be aware of the following:

 Federal regulations regarding air travel: Travelers on federal grants must comply with the US Flag Carrier Rule. With very limited exceptions, travel must occur on US air carriers. If travel did not occur on a US carrier airline, the traveler must

- complete the Fly America Exception form and attach the form to their Expense Report.
- Segregation of costs: Certain costs must be segregated to the appropriate
 account to ensure proper exclusion from Indirect Cost Rate calculations. These
 accounts cannot be charged to government grant accounts. This applies to costs
 the government deems unrelated to University business (flowers, alcohol,
 entertainment) or excessive costs (business/first class travel, luxury hotels).

Questions as to which travel or related business expenditures are reimbursable under a particular grant or contract should be directed to the appropriate Sponsored Projects Administration project officer.

Expectations of a 501(c)3 Organization

The IRS grants the University exemption as a 501(c) 3 organization in order to accomplish our mission, which exempts the University from paying certain taxes. Since the University is directly supported by students and donors, and indirectly by the taxpaying public, we must be a careful steward of these funds. It may help to remember the "front page test" – will the expense seem appropriate to others if reported on the front pages of a local newspaper?

APPENDIX B -- Non-Reimbursable Expenses

The following miscellaneous expenses are **non-reimbursable**. University policy considers these expenses to be either personal, unnecessary, or avoidable expenses incurred during travel. As a result, there may be tax consequences to the travelers if reimbursed. These non-reimbursable expenses include (but are not limited to):

- Airline or VIP club membership dues or one-day admission fees
- Airphone usage
- Baby-sitting
- Barbers and hairdressers
- Clothing or toiletry items
- Internet charges at home
- Excess baggage costs related to personal property
- Expenses related to vacation or personal days taken before, during, or after a business trip
- Frequent Flyer Miles (Travelers will not be reimbursed for airline tickets purchased, partially purchased or accommodations and upgrades obtained using frequent flyer miles)
- Travelers will not be reimbursed for credits issued by an airline from personal travel used to purchase airline tickets for business travel

- Credit card and Airline Rewards program/points
- Gift cards as a payment mechanism should not be used for travel and business expenses as they will not be reimbursed
- Helicopter services for local travel/entertainment
- Laundry or cleaning expenses on trips lasting five (5) days or less, unless emergency circumstances are documented
- Loss or theft of cash advance money or airline tickets
- Loss or theft of personal funds or property
- Lost baggage
- Luggage and briefcases
- Magazines, newspapers, personal reading materials
- Medical expenses while traveling
- Mini-bar alcoholic refreshments
- Movies
- "No show" charges for hotel or car service
- Online auction sites
- Personal entertainment
- Pet care
- Recreational expenses
- Saunas, massages, spa visits
- Shoe shines
- Souvenirs or personal gifts
- Snacks
- Tips in excess of 20 percent

If a business reason exists for any of these purchases, a policy exception must receive appropriate approvals. Certain exceptions may be considered; however, such reimbursements must be in accordance with the IRS accountable plan and must include Senior Business Officer (SBO) approval. Accounts Payable will rely on the approval from an individual designated as the "SBO" in concur to authorize the exception. The individual requesting the exception must document the circumstances surrounding the policy departure and provide the department with sufficient explanation in order for the Senior Business Officer to evaluate the situation.