



# MOUNT SINAI HEALTH SYSTEM POLICY & PROCEDURE

Mount Sinai Beth Israel  
Mount Sinai Brooklyn  
Mount Sinai Hospital  
Mount Sinai Morningside  
Mount Sinai Queens  
Mount Sinai West  
New York Eye & Ear Infirmary

<b>POLICY TITLE:</b>	<b>Travel and Meal Policy</b>		
<b>POLICY NUMBER:</b>	ACS-A.2021a	<b>POLICY OWNER:</b>	Finance
<b>EFFECTIVE DATE:</b>	04/01/2021	<b>LAST REVISED DATE:</b>	9/25/2023

## INTRODUCTION AND PURPOSE

The purpose of the Mount Sinai Travel and Meal Policy is to set forth the requirements for approving and reimbursing travel and meal expenses incurred by an employee in the conduct of the employee’s institutional responsibilities. These requirements apply to all travel and meal expenses to be reimbursed by Mount Sinai<sup>1</sup>. Travel and meal reimbursement will be limited to allowable, reasonable and appropriate costs in furtherance of Mount Sinai’s teaching, research and patient care missions and supported by the required documentation. This policy supersedes all previously issued policies regarding travel and meals.

Entertainment expenses are not covered by this policy. The policy regarding Entertainment expenses is at: [www.mountsinai.org/staffentertainmentexpensepolicy](http://www.mountsinai.org/staffentertainmentexpensepolicy); the policy regarding Holiday Parties is at: [www.mountsinai.org/staffholidayeventpolicy](http://www.mountsinai.org/staffholidayeventpolicy). The processing and approval procedures for Travel Requests and Vouchers are located in the TRAVEL module of Sinai Central at: <https://sinaiknowledge.mssm.edu/instructions/finance/travel-request>

## **I. THE MOUNT SINAI MEAL POLICY FOR ON-SITE OR LOCAL ACTIVITIES**

- A. **MEALS ELIGIBLE FOR REIMBURSEMENT:** Onsite business meals can be reimbursed only if the expense is incurred in connection with extraordinary and unscheduled overtime work or appropriate working meetings. Meals can be reimbursed at restaurants only if the expense is incurred as a result of the employee(s)’ local business travel off site, for example to White Plains<sup>2</sup>. Otherwise, reimbursement for meals where the only participants are Mount Sinai employees will not be reimbursed under the Mount Sinai Meal Policy.
- B. **AMOUNT OF REIMBURSEMENT:** Meals should be reasonably priced and in no event will meals be reimbursed at more than \$30 per person per meal.

<sup>1</sup> Mount Sinai as used in this policy includes: The Icahn School of Medicine at Mount Sinai; The Mount Sinai Hospital; Mount Sinai Morningside; Mount Sinai West; Mount Sinai Queens; Mount Sinai Brooklyn; Mount Sinai Beth Israel; New York Eye and Ear Infirmary at Mount Sinai; and the Mount Sinai Network.

<sup>2</sup> Meals while on Intercity travel are subject to the per diem in section III below.



- C. STARK LAW COMPLIANCE: All meals provided to referring physicians are subject to limitations in the Stark Law and must be reported to the Compliance Office for tallying and record keeping.

## II. THE LOCAL TRAVEL AND COMMUTING POLICY

- A. COMMUTING EXPENSES ARE NEVER REIMBURSED: Commuting is a personal expense and in accordance with this policy and applicable law are never reimbursable. Commuting is generally defined as travel from your residence to any usual work location.
- B. REIMBURSEMENT FOR REASONABLE LOCAL TRAVEL: Other local travel, which is defined as travel within 75 miles of either your residence or your usual work location, for legitimate business purposes is reimbursable. Employees are expected to use the appropriate cost efficient modes of transportation such as subway, train, taxis and Ubers. If a personal vehicle is used the reimbursement will be as provided below in the Intercity Travel Policy (see: III.B) will be applied.
- C. DOCUMENTATION REQUIRED FOR LOCAL TRAVEL: Although appropriate documentation is required for local and regional travel expenses to be reimbursed a travel request or voucher is not required.

## III. THE INTERCITY TRAVEL AND EXPENSE POLICY

- A. IN GENERAL: Intercity travel is all travel that is not local travel (*see II.A, above*). As more fully set forth in this policy, an intercity traveler who will be seeking reimbursement must obtain authorization for Intercity Travel on a Travel Request Form prior to traveling. To obtain reimbursement, the traveler must complete a Travel Voucher and Itemization of Travel Expenses soon after returning from the trip and in no event more than 60 days after the trip is completed.
- B. CRITERIA FOR PLANNING AND REQUESTING INTERCITY EXPENSE REIMBURSEMENT: Mount Sinai reimburses its personnel for reasonable and proper expenses incurred while traveling intercity on institutional business. It is expected that the following guidelines will be followed or the expense may not be reimbursed:
- ❖ **Booking Arrangements.** Air, rail, bus, hotel, and car rental arrangements may be made through the Mount Sinai's approved travel agency American Express Global Travel (AMEX GBT), or by the traveler. Tickets purchased through AMEX GBT are billed directly to the funding source.



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- ❖ **Conference Site.** For conferences offered at more than one location, the closest (or lowest cost) location should be selected. Selections otherwise must be approved by the Department Chairman (for the School) and the appropriate Hospital President (for the Hospitals) or Senior Vice President (for all others). Official function and seminar/conference fees are reimbursable.
- ❖ **Airline Travel.** All air and rail travel must be for attendance at an out of town meeting or event on behalf of Mount Sinai. Purchase economy or coach class airline/rail tickets. To the extent possible, purchase tickets in advance to obtain the best rates. First, business and coach plus class travel are not reimbursed. Use of private planes will not be reimbursed. If travel is on a grant, Amtrak train travel is allowable only if it meets governmental exceptions and documentation requirements.
- ❖ **Luggage.** Costs of reasonable luggage charges for the travel are reimbursable upon submission of documentation/ receipts.
- ❖ **Grants.** For travel supported by Federal Grants and Contracts please see special requirements below.
- ❖ **Private Automobile Usage.** The reimbursement is made based on the business standard mileage rate published by the Internal Revenue service (IRS). **See link for current reimbursement rate for using personal vehicles [Privately Owned Vehicle \(POV\) Mileage Reimbursement Rates | GSA](#).** Gasoline costs and expenses associated with ownership are included in this rate. Traffic violations are not reimbursable, but tolls and parking fees are.
- ❖ **Automobile Rentals.** Car rental is a permitted expense where renting a car is more feasible than the other transportation options available. Generally, compact cars should be requested, except when three or more employees will be traveling together. Rental fees, mileage fees, taxes, fuel, parking, insurance and tolls for non-luxury vehicles are reimbursable expenses. Employees should accept collision insurance unless the credit card used offers this coverage as a benefit. Mount Sinai's corporate discount should always be requested.
- ❖ **Other Forms of Transportation.** Travel expenses for business related travel within cities or to transportation terminals are reimbursable (i.e., taxi, shuttle, and bus fares).

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❖ **Lodging Accommodations.** Lodging accommodations will be paid only when overnight stay is necessary. Use conference or meeting room rates whenever available and reasonable. When there is no designated conference or meeting hotel, book moderate cost, not luxury hotels. Reimbursement will be made on the basis of reasonable costs incurred. Corporate discount rates should be obtained whenever possible. No lodging is permitted as an allowable expense if within 100 miles of the traveler's residence, except for approved overnight offsite meetings. Other forms of lodging such as Airbnb are allowable. Examples of non-allowable lodging expenses, spa services, Gift shop purchases, pet care, upgrades for suites, and extra days for personal reasons.

❖ **Meals/Other Incidental Expenses.** Reimbursement for meals and all incidental expense while on Intercity Travel is based on per diem rate of \$70 per day. Mount Sinai employees traveling together may eat together and the most senior Mount Sinai employee present may pay the bill for all attending. (Reminder: the reimbursement of entertainment and recruitment expenses are governed by the Entertainment Expense Policy.)

❖ **Child Care (GRANTS ONLY).** Temporary child care costs above and beyond regular dependent care that directly results from travel to conference is allowable provided that:

- The costs are a direct result of the individual's travel for institution's business purpose;
- The costs are consistent with the School's documented travel policy for all entity travel; and
- Are only temporary during the travel period.

Travel costs for dependents are unallowable, except for travel for duration of six months or more with the prior approval of the granting agency, if any.

❖ **Examples of Non-Reimbursable Expenses.** The following expenses are examples of non-reimbursable expenses:



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- First, business or coach plus class air travel and cost of seat selection.
- Personal Credit Card fees
- Charges related to being accompanied by a spouse or friend.
- Costs incurred for failure to cancel a trip or hotel reservation.
- Costs incurred to change flights/travel for personal convenience.
- Lost or stolen tickets, cash, or personal property. If you lose a ticket, contact the travel agency or airline immediately.
- Expenses not directly related to the purpose of the trip (i.e. video rentals, etc.).
- Laundry (during short stays).
- Travel insurance in excess of that provided by the Medical Center.
- Any type of alcohol beverage.

C. REQUIRED APPROVALS FOR INTERCITY TRAVEL: All Intercity Travel Requests require the minimum approvals indicated in the box below. Travel Vouchers need only be approved by the first-level administrator who signed the original Travel Request. Travel Vouchers for Corporate Senior Vice Presidents, the Hospital President and the Dean must be reviewed by the V.P. of Internal Audit before being sent to the President for approval. ‘Retro-active’ requisitions, for either Domestic or Foreign travel are not allowed and cannot be processed. Employees will **NOT** be reimbursed without an approved travel requisition.



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	Department				Finance			GCO	Dean's Office
	Traveler	Principal Invest.	Dept. Admin	Chairman	Gen. Acctg.	FPA Acctg.	Sponsored Projects		
<b>Domestic Travel, charge to:</b>									
- School Budget, Gift or Endowment Accts	•		•		•				
- FPA Accts	•		•			•			
- Grant Funds									
• Federal & Non-Federal	•		•				•		
- Chairman (per above, plus Dean's Office)	•		•		○	○	○		•
<b>Foreign Travel, charged to:</b>									
- School Budget, Gift or Endowment Accts	•		•	•	•				
- FPA Accts	•		•	•		•			
- Grant Funds									
• Federal (53,54,55,56,57,58,59)	•	•	•	•			•	•	
• Non-Federal (49, 66, 67)	•	•	•	•			•		
- Chairman (per above, plus Dean's Office)	•	○	•		○	○	○		•

<b>Approvals for Other Mount Sinai Employees</b>	
<b><u>Employee</u></b>	<b><u>Approver</u></b>
Chief Executive Officer and Dean of the Medical School	Each other or the EVP for Administration
Executive Vice Presidents and Hospital Presidents	CEO, Dean or EVP for Administration
Senior Vice Presidents	Appropriate EVP or appropriate Hospital President
Vice Presidents	Appropriate SVP or EVP or appropriate Hospital President
Other employees	Appropriate VP, SVP or EVP or appropriate Hospital President



- D. FREQUENT TRAVELER PROGRAMS AND PROMOTIONAL MATERIALS: Travelers are permitted to retain frequent flyer miles or promotional materials received in connection with official travel, as long as they were obtained under the same conditions as those offered to the general public and at no additional cost to the institution or the Government if travel is funded by the Government. The miles may be applied toward future official business trips, for upgrades at no additional cost to the institution or the Government, or for personal use. (See NIH Travel Manual Chapter 1500-0 1, for additional information.)

Mount Sinai will not reimburse travelers for tickets purchased with the frequent flyer miles. Providing monetary compensation to an employee for a free ticket is considered additional income. Frequent flyer memberships should not influence travelers to select flight that is not the lowest priced flight available.

- E. TRAVEL ADVANCES & PREPAYMENTS: Cash advances for travel expenses are available only to students, residents, and fellows. Extraordinary circumstances giving rise to an exception making advances available to others must be approved by the Dean, the Hospital President or CFO, as appropriate. Advances are limited to local transportation, hotel accommodations (if they cannot be prepaid), meals, and specific miscellaneous expenses identified on the Travel Request.

Advanced payments must be requested on the online Travel Request. By making use of prepayments and the institution's approved travel agency, the need for cash, and therefore an advance, is significantly reduced. Individuals eligible for advances are not required to use personal credit cards, but the need for cash could be reduced further by using them to pay for meals. Timely submission of the Travel Voucher will ensure reimbursement for any such credit card charges **before** the bill becomes due.

Important warning: The Treasury Department views cash advances as taxable income unless there is documentation on file proving that the cash payment was reimbursement for business-related expenses. Therefore, until an individual submits a Travel Voucher with appropriate documentation, we have no such proof and must report that advance to the IRS as taxable income. Cash advances outstanding more than 90 days will be subject to this action.

- F. TRAVEL INSURANCE: Free accidental death and dismemberment travel insurance is automatically provided to employees traveling outside the New York metropolitan area on institutional business. To qualify, employees must work at least 17.5 hours per week. Coverage applies to such travel anywhere in the world and begins when the traveler leaves his/her home or place of business. In the event proceeds are distributed to a beneficiary and a beneficiary is not designated on the Travel Request form, they will be paid to the individual named as beneficiary on the employee's file card in the Benefits office.



IV. **REQUIRED DOCUMENTATION FOR REIMBURSEMENT FOR ITEMIZED LOCAL MEALS NOT COVERED BY THE PER DIEM AND ALL TRAVEL**

❖ IN GENERAL:

- ❖ If the employee works remote, the reimbursement for travel shall be from Mount Sinai (New York City) and the destination round trip or the remote location and the destination whichever is lower.
- ❖ Membership fees for Associations/Societies is allowable only if it is required to attend the conference/meeting.
- ❖ If meals are provided at the conference, the daily per diem should be reduced based on the current GSA Rate for Meals.

All reimbursement vouchers must be accompanied by scanned receipts that are attached to the voucher. Detailed receipts and documentation as set forth below must be submitted with the expense report for all expenses over \$25.00 or the expense will not be reimbursed. In every case the business purpose must be stated. Original receipts should be saved by the traveler in case needed for future audit purposes.

❖ TIME FRAME FOR SUBMITTING DOCUMENTATION:

Completed reimbursement claims should be submitted with all required documentation within 30 days of the expense being incurred. Any claims submitted more than 90 days after the expense is incurred will not be reimbursed.

❖ REQUIRED DOCUMENTATION:

The original receipts, organized neatly and scanned must be attached to the online form. Note: The following information must be clear, and easily readable in the scanned documents:

In every case:

- **Date of Expenditure and list each expenditure by the date incurred**
- **Amount (converted to US dollars and include support for the exchange rate used)**
- Vendor Name/Service Provider
- Description of item paid
- Business Purpose (*a good business purpose, e.g.: "attend conference regarding neurosurgery innovation; a bad business*





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*purpose, e.g. would be “dinner with Mount Sinai colleagues” no matter what the purpose.) If travelling for a seminar or conference, your request must include: a) the organizing society’s name, b) the meeting location and c) the dates that the event is taking place in the request. You may provide the summary agenda or a screen shot in the organizer’s page that includes above information to the supporting documentation in the Travel Request AND Travel Voucher*

### Transportation:

- Car - automobile parking and toll receipts
- Train and Bus - bus/train ticket stubs and payment receipts, or if E-Ticket is obtained, a printout of the E-ticket containing the ticket price and proof of payment
- Car Service and Taxi carfare receipts.
- Air - Airline ticket stub and proof of payment or, If E-ticket is obtained, the traveler should submit a printout of the E-ticket containing the ticket price and proof of payment showing cost of the ticket and prof of payment are required.

### Hotel:

- Itemized hotel bill with proof of payment and original receipt

### Meals:

- Itemized receipt listing the food and beverage items purchased/consumed and the number of diners present for the meal.
- If more than one person attended, the names and titles of each attendee.

### Other:

- Official function and registration fee receipts, cancelled checks.

### ❖ MISSING DOCUMENTATION REMEDIATION:

In the event an employee is missing documentation, reimbursement for the expense will be in the discretion of Mount Sinai. In order to submit a request for reimbursement without

document the following are required:

- **For intercity travel**, the traveler must list all expenses on the online travel voucher soon after returning from the approved trip. Expenses without documentation/receipts should be listed on the 'Comments' section of the form, and where and why expenses incurred must be explained. A flat amount of up to \$15 will be reimbursed for the expenses relating to recovering missing receipts.
- **For local/regional travel and meals**, the traveler must itemize and explain each undocumented expense on a Petty Cash Voucher or, if total expenses are \$200 or more, on a Check Request. The explanation must include when, where, and why the expense was incurred. A flat amount of up to \$15 will be reimbursed for the expenses relating to recovering missing receipts.

**V. EXCEPTIONS TO THE TRAVEL AND MEAL POLICY.**

❖ **EXCEPTIONS ONLY GRANTED BY AUTHORIZED EXECUTIVES:**

In general expenses will be reimbursed only in compliance with this policy. Mount Sinai recognizes that on occasion, exceptions to this policy may need to be made. Only the CEO, the EVP for Administration, a CFO, a Hospital President or the Dean (an “Authorized Executive”) are authorized to approve exceptions to any provision in this policy. Authorized Executives are not permitted to make exceptions for themselves, any requests for exceptions by an Authorized Executive must be approved by another Authorized Executive. All exceptions must be secured in writing, and is the usual circumstance, prior to the expense being incurred, must have stated reasons for the exception, and must be documented in the expense submission.



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- ❖ **REIMBURSEMENT FOR UPGRADES:** Mount Sinai recognizes that employees may want to stay at luxury hotels, eat at four star restaurants or fly first class. To accommodate its employees' choices, while remaining mindful of Mount Sinai's charitable mission and purpose, if the category of the meal, travel or hotel, exceeds the maximums set out in this policy, Mount Sinai will reimburse the employee up to the maximum allowable amount set forth above, provided the requisite documentation is provided. In this way the employee can use the employee's own incremental funds to enjoy a level of service that will not be reimbursed by Mount Sinai. By way of example, if an employee takes an unapproved class of service on a flight, Mount Sinai will reimburse the traveler for the lowest cost available fare (taking into consideration the convenience of the airport or train station, departure and arrival times, and restrictions and/or cancellation fees) provided that the traveler has submitted adequate documentation of the available fares (such as a screen shot) as part of the expense reimbursement submission. In the absence of such documentation, Mount Sinai may decline to reimburse the traveler for any portion of the fare, hotel or meal.

### **VI. COMPLIANCE AND CONSEQUENCES**

All individuals who incur or authorize business expenses have a responsibility to ensure that funds are used appropriately and exercise due diligence when generating, reviewing, and approving transactions. Expenses incurred that are determined to be unallowable will become the financial responsibility of the individual incurring the expense and may result in disciplinary action, including, without limitation, termination.

### **VII. ADDITIONAL INFORMATION**

If additional information is required; contact Accounts Payable; School General Accounting; Faculty Practice Associates Accounting; Sponsored Projects Finance; or the Grants and Contracts Office, as appropriate.



**VIII. SPECIAL RULES GOVERNING FEDERAL GRANT RELATED TRAVEL EXPENSES:**

- A. REQUIREMENTS OF GRANTING AGENCIES: Many granting agencies (federal, state, and foundation) require approval be obtained for travel not included in the Notice of Award before the proposed travel takes place. An agency may disallow reimbursement **if** appropriate and original documentation is not submitted. Grant and contract restrictions supersede institutional policy to the extent that they are more restrictive. As such, travel expenses in excess of those allowable and approved in the grant or contract may be disallowed regardless of institutional guidelines. Sponsored Projects Finance will advise when prior approval is needed from the Grants and Contracts Office or the granting agency when clarification is requested.
- B. GRANTS AND CONTRACTS OFFICE APPROVAL REQUIRED: Travel requests for foreign travel<sup>3</sup> on federal grants and contracts require prior approval from the Grants and Contracts Office.
- C. SPECIAL REQUIREMENTS OF THE FLY AMERICA ACT:

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<sup>3</sup> Travel within and between any of the fifty states of the U.S., its possessions and territories, and Canada. U.S. possessions and territories include: Commonwealth of Puerto Rico, Guam, Virgin Islands (St. John, St. Croix, St. Thomas), American Samoa, Wake Island, Wilkes, Peale, Midway island (Sand, Eastern), Johnston A to II, Kingman Reef, Caroline Islands, Marshall Islands and Mariana Islands. All other travel is "foreign" travel.

United States law 49 U.S.C. 40118, commonly referred to as the "Fly America Act," requires use of U.S. flag air carrier service for all air travel funded by the U.S. Government. In cases where a U.S. flag air carrier does not provide acceptable service for a particular leg of a trip, foreign air carrier service may be used but only to or from the nearest interchangeable point on a usually traveled route to connect with U.S. flag air carrier service.

Please note, Canadian airlines are not Fly America Act compliant, even though travel to Canada is not considered foreign travel.

In these circumstances, the Federal Travel Regulation Sections 301- 10.135-138 specify the exception criteria used to determine the non- availability of a U.S. flag air carrier. See attached Fly America Act Waiver Checklist Annex 5. **The word file is available at this link**

<https://icahn.mssm.edu/files/ISMMS/Assets/About%20the%20School/Finance/FlyAmericaWaiverChecklist.doc>



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International air travel on foreign air carriers sometimes could meet the requirements of the Fly America Act when a U.S. flag air carrier has a code sharing arrangement with a foreign air carrier however the travel should be booked under the U.S. Flag Carrier's name.

Federal regulations have been revised to indicate that the ticket (or documentation for an electronic ticket) must identify the U.S. Flag air carrier's two-letter designator code and flight number, which is located on the right-hand section of the passenger receipt. This indicates that the flier is in a U.S. flag carrier seat, regard less of the air carrier that owns the aircraft.

*General Services Administration (GSA) by Federal Travel Regulation GSA Bulletin FTR 11-02 has modified the requirements with respect to the European Union (EU) airlines and the Fly America Act requirements. EU airlines are now granted the right to transport civilian agency-funded passengers between a point in the US and a point outside the US. A list of the EU countries is appended to the end of this policy.*

## **Appendix: List of Countries in Compliance with Fly America Act:**

When travel is supported by federal funds, the traveler must fly on a U.S.-flag air carrier unless an exception, under the Federal Travel Regulation, is authorized for travel on a foreign air carrier. Authorized exceptions must be documented and certified.

Exceptions to the Fly America Act are outlined in the following categories:

### **1. Code Share Agreement**

A code-share agreement is an arrangement where two or more airlines share the same flight. In these arrangements, a U.S. air carrier may sell a seat on a flight that is actually operated by a foreign air carrier under a different flight number or code. However, compliance with the Fly America Act is satisfied only when the ticket or documentation for an electronic ticket identifies the U.S.-flag air carrier's designator code and flight number.

#### **Documentation Requirements**

To satisfy regulatory agreements that a flight is FAA compliant under a code-share agreement, travelers must retain documentation that confirms the U.S.-flag air carrier's designator code and flight number. This information is located on the ticket, e-ticket, or boarding pass. The traveler is responsible for retaining the appropriate document as proof of compliance.

### **2. Open Skies Agreements**

There are only four Open Skies Agreements that have been determined to meet Fly America Act compliance requirements by the U.S. Department of Transportation.

These agreements represent the biggest exceptions to the Fly America Act because they allow use of foreign air carriers that provide services under a bilateral or multilateral air transportation agreement to which the United States Government and the government of a foreign country are parties.

Below are the four Open Skies Agreements in effect. Select a destination for important requirements about each agreement.

[Open Skies Agreement U.S. & European Union \(EU\) including Norway and Iceland](#)

- [EU Member Countries](#)

[Open Skies Agreement U.S. & Australia](#)

[Open Skies Agreement U.S. & Japan](#)

[Open Skies Agreement U.S. & Switzerland](#)

## Important Notes:

1. Open Skies Agreements do not apply if travel is funded by the Department of Defense (DOD), including the U.S. Military (Army, Navy, and Air Force).
2. Travel under certain Open Skies Agreements can be restricted if a City Pair rate is in effect for the specified travel route. If a City Pair rate is in effect, then travel must be provided by a U.S.-flag air carrier, unless another authorized exception applies.

Open Skies Agreement - EU Countries (see Annex 1 for additional conditions)

Austria  
Belgium  
Bulgaria  
Croatia  
Cyprus  
Czech Republic  
Denmark Estonia  
Finland  
France  
Germany  
Greece  
Hungary  
Iceland  
Ireland  
Italy  
Latvia  
Lithuania  
Luxembourg  
Malta  
Netherlands  
Norway  
Poland  
Portugal  
Romania  
Slovakia  
Slovenia  
Spain  
Switzerland  
Sweden

[Open Skies Agreement U.S. & Australia](#) (see Annex 2 for additional conditions)

[Open Skies Agreement U.S. & Japan](#) (see Annex 3 for additional conditions)

[Open Skies Agreement U.S. & Switzerland](#) (see Annex 4 for additional conditions)

## **REFERENCES AND LINKS**

- PEAK: 2021 Policy Training – Travel, Meals, Entertainment and Holiday Events.  
(Please copy and paste the link below into your chrome web browser to access the PEAK training module on how to properly submit Travel and Meal documentation via Sinai Central)\_  
<https://peak.mountsinai.org/learncenter.asp?id=178409&page=277>

## Annex 1 – Open Skies US and EU

### **Open Skies Agreement U.S. & European Union (EU) including Norway and Iceland**

Travel to a European Union Country, Norway and Iceland

According to the Open Skies agreement between the U.S. and the **EU countries** [https://europa.eu/european-union/about-eu/countries/member-countries\\_en](https://europa.eu/european-union/about-eu/countries/member-countries_en), Norway, and Iceland, travelers may fly on any EU air carrier (air carriers of the European Union and its Member States), but ONLY when the following conditions are met:

1. Travel is **NOT** funded by the U.S. Department of Defense (DOD) including the U.S. Military (Army, Navy and Air Force).
2. Flight **must** originate, arrive or stop in an EU country, Norway or Iceland Examples of permissible routes are listed below (this is not an exhaustive list):

#### **A point in the European Union to a point in the United States**

*Example: Frankfurt (FRA) to New York (NYC);*

A point in the United States to a point in the European Union

*Example: New York (NYC) to Paris (PAR);*

A point in the European Union to a point in the United States to a further point in a foreign country

*Example: Dublin (DUB) to New York (NYC) to Vancouver (WR);*

A point in a foreign country to a point in the United States to a further point in the European Union

*Example: Mexico City (MEX) to New York (NYC) to Madrid (MAD);*

A point in the United States to a point in a foreign country to a further point in the European Union

*Example: Cleveland (CLE) to Montreal (YMQ) to Barcelona (BCN);*

A point in the European Union to a point in a foreign country to a further point in the United States

*Example: Vienna (VIE) to Toronto (TOR) to Denver (DEN);*

A point in a foreign country to a point in the European Union to a further point in the United States

*Example: Istanbul (IST) to Amsterdam (AMS) to Memphis (MEM);*

**A point in the United States to a point in the European Union to a further point in a foreign country**

*Example: Orlando (MCO) to London (LON) to Moscow (MOW);*



**Annex 1 – Open Skies US and EU**  
***(continued)***

A point in the United States to a point in European Common Aviation Area\*

*Example: Washington, DC (WAS) to Sarajevo (SJJ); and*

A point in European Common Aviation Area to a point in the United States\*

*Example: Belgrade (BEG) to Washington, DC (WAS).*

**When both of these conditions are met, the traveler may travel on a U.S. flag or EU air carrier.**

A list of the most common EU airlines is below.

- Austrian (Austria)
- Brussels Airlines (Belgium)
- Cyprus Airways (Cyprus)
- Czech Airlines (Czech Republic)
- Finnair (Finland)
- Air France (France)
- Air Berlin (Germany)
- Lufthansa (Germany)
- Aegean Airlines (Greece)
- Olympic Air (Greece)
- Malev Hungarian Airlines (Hungary)
- Icelandair (Iceland)
- Alitalia (Italy)
- air Baltic (Latvia)
- Luxair (Luxembourg)
- Air Malta (Malta)
- KLM (The Netherlands)
- LOT Polish Airlines (Poland)
- TAP Portugal (Portugal)
- TAROM (Romania)
- Adria Airways (Slovenia)
- Iberia (Spain)
- SAS (Sweden)

## Annex 2 – Open Skies US and Australia

### Open Skies Agreement U.S. & Australia

Travel to Australia

According to the Open Skies agreement between the U.S. and Australia, travelers may fly on any Australian air carrier, but ONLY when the following conditions are met:

3. Travel is **NOT** funded by the U.S. Department of Defense (DOD) including the U.S. Military (Army, Navy and Air Force).
4. U.S. government **DOES NOT** have a published City-Pair agreement in effect for the travel route
  - The GSA's (U.S. General Services Administration) **City Pair Program (CPP)** <http://www.gsa.gov/portal/content/104512> offers government negotiated reduced fares for flights between certain cities. If a city pair agreement is in effect for your travel route, you may not claim an Open Skies exception and must fly on a US flag air carrier or US code share carrier, unless another FTR exception applies.
  - Go to the Airline City Pairs search link: <http://cpsearch.fas.gsa.gov/> before booking flights to determine if a city-pair agreement is in effect for your travel route. Enter the traveler's departure and arrival cities in the search tool and take the appropriate action depending on the following results:
    - If the search tool displays the ***city pair agreement rates*** - then the traveler must fly on a U.S. flag air carrier, unless another FTR exception applies.
    - If the search tool displays "***awards not found for the given criteria***" – then the traveler can fly on the Australian air carrier.

**When both of these conditions are met, the traveler may travel on a U.S. flag or Australian air carrier.**

A list of the Australian airlines is below:

- Qantas Airways
- Virgin Australia

## Annex 3 – Open Skies US and Japan

### Open Skies Agreement U.S. & Japan

Travel to Japan

According to the Open Skies agreement between the U.S. and Japan, travelers may fly on any Japanese air carrier, but ONLY when the following conditions are met:

5. Travel is NOT funded by the U.S. Department of Defense (DOD) including the U.S. Military (Army, Navy and Air Force).
6. U.S. government DOES NOT have a published City-Pair agreement in effect for the travel route
  - The GSA's (U.S. General Services Administration) **City Pair Program (CPP)** <http://www.gsa.gov/portal/content/104512> offers government negotiated reduced fares for flights between certain cities. If a city pair agreement is in effect for your travel route, you may not claim an Open Skies exception and must fly on a US flag air carrier or US code share carrier, unless another FTR exception applies.
  - Go to the Airline City Pairs search link: <http://cpsearch.fas.gsa.gov/> before booking flights to determine if a city-pair agreement is in effect for your travel route. Enter the traveler's departure and arrival cities in the search tool and take the appropriate action depending on the following results:
    - If the search tool displays the ***city pair agreement rates*** - then the traveler must fly on a U.S. flag air carrier, unless another FTR exception applies.
    - If the search tool displays "***awards not found for the given criteria***" – then the traveler can fly on the Japanese air carrier.

**When both of these conditions are met, the traveler may travel on a U.S. flag or Japanese air carrier.**

A list of the Japanese airlines is below:

- Japan Airlines
- All Nippon Airways

## Annex 4 – Open Skies US and Switzerland

### Open Skies Agreement U.S. & Switzerland

#### Travel to Switzerland

According to the Open Skies agreement between the U.S. and Switzerland, travelers may fly on any Swiss air carrier, but ONLY when the following conditions are met:

1. Travel is NOT funded by the U.S. Department of Defense (DOD) including the U.S. Military (Army, Navy and Air Force).
  
2. U.S. government DOES NOT have a published City-Pair agreement in effect for the travel route
  - The GSA’s (U.S. General Services Administration) City Pair Program (CPP) <http://www.gsa.gov/portal/content/104512> offers government negotiated reduced fares for flights between certain cities. If a city pair agreement is in effect for your travel route, you may not claim an Open Skies exception and must fly on a US flag air carrier or US code share carrier, unless another FTR exception applies.
  
  - Go to the Airline City Pairs search link: <http://cpsearch.fas.gsa.gov/> before booking flights to determine if a city-pair agreement is in effect for your travel route. Enter the traveler’s departure and arrival cities in the search tool and take the appropriate action depending on the following results:
    - If the search tool displays the ***city pair agreement rates*** - then the traveler must fly on a U.S. flag air carrier, unless another FTR exception applies.
  
    - If the search tool displays ***“awards not found for the given criteria”*** – then the traveler can fly on the Swiss air carrier.

**When both of these conditions are met, the traveler may travel on a U.S. flag or Swiss air carrier.**

A list of the Swiss airlines is below:

- Swiss International

## FLY AMERICA ACT WAIVER CHECKLIST

(To assist in determining qualification for a waiver of the restrictions of the Fly America Act under 41 CFR Part 301 -10, check the applicable statement(s) below.)

Award Fund Number: \_\_\_\_\_ Requestor: \_\_\_\_\_  
Travel Destination: \_\_\_\_\_ Travel Date: \_\_\_\_\_  
Foreign Carrier: \_\_\_\_\_

All air travel on federal award must comply with the Fly America Act. In some instances, your airline may use a non U.S flag air carrier if it meets one or more of the exception criteria listed in the Federal Travel Regulation guidelines FTR sections 301.10.135-138. **Please check all applicable boxes below where exception criteria are met.** Please note that lower cost and personal convenience are not acceptable criteria for justifying the non-availability of a U.S. flag air carrier.

\_\_\_\_\_ Foreign air travel on a non-U.S. air carrier is financed by U.S. Government, or will be claimed as costs under an award. (If you do not check this block, the restrictions of the Fly America Act do not apply. Check at least one of the statements below to qualify for a waiver of the restrictions of the Fly America Act.)

\_\_\_\_\_ Use of foreign air carrier is a matter of necessity because of: (Must check one below)  
\_\_\_\_\_ U.S. flag air carrier cannot provide the air transportation needed, e.g. \_\_\_\_\_  
\_\_\_\_\_ Use of foreign air carrier is necessary for medical reasons. \_\_\_\_\_ Use of foreign air carrier is required to avoid unreasonable risk to traveler s safety. (See 41 CFR 301-10.138(b) (2) for supporting evidence needed.)  
\_\_\_\_\_ Seat on U.S. air carrier in authorized class of service is unavailable, seat on foreign air carrier in authorized class of service is available.  
\_\_\_\_\_ Other. (Provide detailed explanation.)  
\_\_\_\_\_ Use of U.S. flag air carrier will not accomplish the Department s mission. (Provide detailed justification)

\_\_\_\_\_ Bilateral or multilateral air transportation agreement. U.S. is a party and Dept. of Transportation determines agreement meets requirements of Fly America Act.

\_\_\_\_\_ No U.S. flag air carrier provides service on a particular leg of your route (Travelers can only use foreign air carrier to or from the nearest interchange point to connect with a U.S. carrier).

\_\_\_\_\_ A U.S. flag air carrier involuntarily reroutes traveler on a foreign air carrier.

\_\_\_\_\_ Service on a foreign air carrier is three hours or less, and use of U.S. flag air carrier doubles en route travel time.

## FLY AMERICA ACT WAIVER CHECKLIST

\_\_\_\_\_ Air travel is between the U.S. and another country and use of a U.S. carrier on a nonstop flight extends travel time by 24 hours or more.

Any other air travel. *(You must check at least one of the following statements to qualify for a waiver of the Fly America Act restrictions in this section)*

\_\_\_\_\_  Use of a U.S. carrier increases the number of aircraft changes outside the U.S. by two or more.

\_\_\_\_\_  Use of a U.S. carrier extends travel time by six hours or more.

\_\_\_\_\_  Use of a U.S. carrier requires a connecting time of four hours or more at an overseas interchange point.

Remember, you **must use a U.S. flag air carrier on every portion of the route where it provides service** unless you qualify for a waiver.

Principal Investigator: \_\_\_\_\_

Administrator: \_\_\_\_\_

Traveler: \_\_\_\_\_

**Travel and Meal Policy Effective date 04/01/2021**

<b>Reviewed:</b>						
<b>Revised:</b>	9/25/2023					