

**TULANE TRAVEL POLICY**

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**Responsible Executive:** COO, SVPAF Provost, and SVPAA

**Responsible Office(s):** Materials Management

**Coordinating Units:** Academic Affairs; Accounts Payable; Sponsored Projects Administration; Grants and Contracts Accounting; Office of Enterprise Risk Services; Office of General Counsel; Office of Global Affairs & Regulatory Compliance; and Travel Management Office

**Contact Information for Responsible Office:** Director of Central Procurement Services

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## I. Purpose and Scope of Policy

The purpose of this policy is to promote uniform and consistent travel processes for Tulane-Related travel and accounting for expenses to help ensure efficient use of University resources. The University will pay for or reimburse Tulane-Related travel expenses that are Allowable, Reasonable, Ordinary and Necessary in accordance with this policy. Reimbursements for travel expenses are intended to be fair and equitable and in accordance with federal regulations and IRS accountable plan requirements, [IRS Publication 463](#). While this policy sets forth the minimal criteria to determine which allowable expenses may be eligible for reimbursement by Tulane University, individual schools, departments, or other funding sources (e.g., grant or contract) may have requirements that are more restrictive than this policy; in such event the more restrictive policy will govern.

This policy establishes the four components that a Traveler engaged in Tulane-Related travel must comply with to obtain reimbursement of allowable, non-compensation, business-related travel expenses:

- a. **Travel Approval:** The supervisor or the person in charge of the funding account or project must approve the travel and associated allowable expenses for employees and Affiliates, in writing, prior to purchasing the travel. Tulane-Related travel to Travel Warning Destinations requires additional approval by the Provost Designee, see section VI and [Appendix B](#).
- a. **Allowable:** The travel expense must be considered an Allowable Expense as described in this policy. For guidance in determining what is allowable, see [Appendix A](#).
- b. **Travel Booking:** Anyone booking travel governed by this policy is required to utilize the Concur Travel booking tool or to contact a travel agent directly at Tulane's currently approved travel agency to book the travel.
- c. **Travel Expense Reporting:** The Traveler and/or a Guest Travel Coordinator must submit the travel expenses for approval in Concur. An Expense Delegate may prepare the expense report for submission, but the Traveler and/or Guest Travel Coordinator must submit it.

## II. Who is subject to this Policy

This policy applies to all Tulane-Related travel involving University employees, students, and other Affiliates ("Travelers") as well as employees who review and approve travel expenses. Additionally, centers, university departments, schools and divisional business officers are responsible and held accountable for adherence to this policy.

For more details on submitting expense reports visit the [Tulane Accounting Concur Resources](#) website.

## III. Definitions

Affiliate – Is defined broadly to include anyone who is not a Tulane student or employee, including but not limited to donors, grantors, independent contractors, prospective employees, visiting faculty and others that engage in Tulane-Related travel and are authorized to receive direct payment of business expenses incurred or expense reimbursement. Travel (airfare, hotel,

and car rental) for Affiliates must be booked by a Tulane Guest Travel Coordinator and purchased using a Tulane T&E card.

Allowable Expense – An actual expense that is Necessary, Reasonable, and Ordinary and incurred to accomplish the business purpose of the travel. For guidance in determining what is allowable, see [Appendix A](#).

Concur – Tulane’s online travel booking tool and travel expense reporting system.

Essential Travel— **for purposes of trips to Travel Warning Destinations, Essential Travel** involves TU-Related travel that is considered necessary, required, or serves a compelling academic or business interest of the University. Examples include:

- Faculty, Researchers, Postdoctoral Scholars, and Graduate Students: travel that is either (a) required to preserve the safety of a research subject and/or the results of a research activity; or (b) considered essential by the funding source.
- Staff: travel where either (a) staff accompany students on approved essential travel, or (b) serves a compelling interest to the operations of the University.
- Students: travel that is necessary to satisfy a graduation requirement and can neither be postponed nor modified to avoid travel.

Expense Delegate – Is defined as an employee or contractor authorized by the university to prepare expense reports (or check requests for guests) on behalf of the individual seeking reimbursement.

Expense Report Approver (ERA) – Is defined as an employee authorized by the university to approve business expenditures of others.

Guest Travel Coordinator (GTC) – Is defined as an employee with an active Concur profile authorized to book travel on behalf of non-employees, using a Tulane Company card (T&E).

International Travel—Any travel outside of U.S. States and territories.

Necessary – Minimum purchase or service required to achieve a particular business travel objective.

Ordinary – An expense incurred in the normal course of conducting business while traveling.

Receipt Documentation – An itemized merchant receipt issued by the supplier to substantiate the business transaction including proof of payment. If a receipt is not available or does not contain adequate information, a cancelled check, credit card statement, or paid notice is acceptable.

Reasonable – An expense that is Ordinary and not extreme or excessive according to standard industry pricing.

Travel and Entertainment (T&E) Card Policy – The University maintains a travel/entertainment card program to facilitate payment of travel expenses (airfare/lodging/car rental/charters/meals) incurred in furtherance of university business. Faculty and staff (including adjunct professors and part time employees) who travel or arrange travel for at least three trips per year, travel overseas (even if one trip per year), plan group travel, **or** spend \$6,000 or more on reimbursable entertainment and travel expenses per year, are required to apply for the T&E card. Travelers who do not meet any of these criteria, but would like a T&E card, may apply for consideration.

Employees who have a T&E card are required use that card for travel related purchases (i.e., air, hotel, and car rentals).

Travelers who do not meet any one of the stated criteria and choose not to apply, may use their personal card to book travel, but must use Concur or the university's travel agent to qualify for reimbursement. If a traveler chooses to use a personal card, any additional fees or charges incurred are not reimbursable. Additional required policies and guidelines for the T&E card are located on the [Corporate Travel & Entertainment Card Policies & Procedures](#) website.

Travel Booking Delegate – Is defined as an employee or a contractor of the university with an active Concur profile authorized to book travel reservations (airfare, hotel, charters, and car rental) on behalf of another employee or student, using the traveler's Concur Profile and form of payment.

Travel Manager – Is defined as the current person occupying the role as Tulane Travel Manager.

Travelers – Include Tulane employees, students and Affiliates who book or purchase Tulane-Related travel.

Travel Warning Destination – Tulane-related International Travel (outbound from the U.S.) to a country, region, or location abroad where at least one of the following is true:

- The [U.S. Department of State \(USDOS\)](#) or the U.S. [Centers for Disease Control \(CDC\)](#) has issued travel advice for health, safety or security reasons (not related to COVID 19) of:
  - [Level 3 – High Risk; Reconsider Travel](#): Avoid travel due to serious risks to safety and security. The Department of State provides additional advice for travelers in these areas in the Travel Advisory. Conditions in any country may change at any time.
  - [Level 4 – Extreme Risk; Do Not Travel](#): This is the highest advisory level due to greater likelihood of life-threatening risks. During an emergency, the U.S. government may have very limited ability to provide assistance. USDOS and CDC advise that U.S. citizens not travel to the country or leave as soon as it is safe to do so; and/or
- Tulane's insurer restricts insurance coverage for a particular country (see [countries with foreign exclusion](#)); and/or
- Tulane officials determine that there are other significant safety, security or health concerns that warrant restriction or curtailment of Tulane-Related travel abroad.

Tulane-Related (or TU-Related) – University activity and related travel where one or more of the following elements exist:

- Tulane agrees in advance to grant academic credit (including third-party run programs), allows the activity to count towards graduation, or permits a Tulane certificate of participation.
- The activity fulfills a Tulane degree requirement or will be degree advancing (e.g., capstone projects, or experiential learning).
- The activity is funded in whole or in part by Tulane or by external funds administered by Tulane (e.g., money held or disbursed through the University or Tulane-recognized student organizations).
- The activity is managed or operated by the University, an academic or business TU unit,

a Tulane-recognized student organization or varsity athletic team. It also includes activity that is led by a Tulane employee, a Tulane-recognized student organization or varsity athletic team; and/or

- The activity is part of student travel accompanied by a supervising Tulane employee.

#### **IV. Travel Authorization Roles and Responsibilities**

##### **A. Employee and Student Travelers**

All Tulane employees, students and Affiliates engaging in Tulane-Related travel are responsible for:

1. Obtaining appropriate approval to travel from a supervisor or person in charge of the funding account or project in writing, prior to committing university funds or incurring expenses.
2. For International trips to a Travel Warning Destination, obtain additional health and safety approval from the Provost's Designee. For details, see section VI and [Appendix B](#).
3. Coordinating with the appropriate department or school to ensure that funds are available to pay for travel.
4. Understanding and adhering to specific travel guidelines required by the applicable funding source, agency, department, sponsor, or other outside source paying for the travel. Some of these guidelines may be more restrictive than Tulane's Travel Policy and should be followed accordingly.
5. Refer to [Appendix A](#) for a list of determining what is an allowable business expense.

##### **B. Travel Coordinators for Non-Affiliate Travel**

For Affiliates engaging in Tulane-Related travel, a Guest Travel Coordinator is responsible for:

1. Obtaining appropriate approval to travel from supervisor or person in charge of the funding account or project, prior to committing university funds or incurring expenses.
2. For International trips to a Travel Warning Destination, obtain additional health and safety approval from the Provost's Designee. For details, see section VI and [Appendix B](#).
3. Coordinating with the appropriate department or school to ensure that funds are available to pay for travel.
4. Understanding and adhering to specific travel guidelines required by the applicable funding source, agency, department, sponsor, or other outside source paying for the travel. Some of these guidelines may be more restrictive than Tulane's Travel Policy and should be followed **accordingly**.

#### **V. Travel Booking**

##### **A. Travel Booking Roles and Responsibilities**

###### **1. Employee and Student Travelers**

Tulane employees and students are responsible for:

- a. Ensuring that all airfare, lodging, and car rentals/transportation are booked in accordance with the requirements of this policy.

- b. Tulane Travelers must use a credit card in their name to purchase travel, whether it's a personal card or a T&E card. Card sharing is not allowed. (except when a department has approval from the Travel Manager to purchase travel for a student or group).

## 2. **Travel Coordinators for Affiliates**

Affiliate Travel Coordinators may:

- a. Make travel arrangements for Affiliates traveling on Tulane-Related business;
- b. Purchase approved business travel for Affiliates but may not purchase travel for Employees.

## 3. **Travel Booking Delegates**

Responsibilities for a Travel Booking Delegate include:

- a. Ensuring that the traveler they are booking for has obtained all required approvals prior to booking travel;
- b. Booking travel on behalf of another employee or student;
- c. Using a form of payment in the traveler's name when booking travel (except when a department is approved to purchase travel for a student or group with an agent);
- d. Ensuring that all airfare, lodging, and car rentals/transportation are booked in accordance with the requirements of this policy.

## **B. Air Travel**

### 1. **Air Reservations**

University employees, students, Travel Booking Delegates, and Guest Travel Coordinators are required to utilize the Concur online booking tool (Concur Travel) or Tulane's currently approved travel agency (World Travel Service), to purchase Tulane-related air travel. All air travel booked utilizing the Concur Travel or World Travel Services should be purchased with a Tulane issued Travel & Entertainment (T&E) card at the time of ticketing (unless you fall under an exception—see Definition of Travel & Entertainment (T&E) Card Policy for exceptions).

#### a. **Fares/Ticket Types/Class of Service**

Travelers should purchase the lowest available airfare that meets the business needs of the traveler that is available on Concur Travel or World Travel Service. Tulane considers travelers' use of personal rewards/miles/credits to obtain an upgrade as a personal expense and is not reimbursable. Free upgrades are allowed. Travel insurance is not reimbursable. For externally funded travel, the traveler must comply with all sponsor/grantor rules governing that travel and related activity.

#### b. **Lowest Available Airfare**

Travelers may not book basic economy airfares under this policy and will not be reimbursed for basic economy airfares. Therefore, basic economy airfares are not used to determine the lowest available airfare.

Criteria used to determine the lowest available airfare include:

- Most flights booked using Concur Travel or World Travel Service are non-refundable unless a refundable ticket is required by an external funding source. The lowest available airfare as defined forms a ceiling for the amount that can be paid for airfare;
- Leaves or arrives within a 2-hour window on each side of the Traveler's desired departure or arrival time;
- Allows the Traveler to choose airports;
- Allows a \$150 increase in fare from the lowest available airfare for domestic travel and \$200 difference for international travel if the Traveler does not choose to book a flight that is not the lowest available airfare (e.g., flight schedule, routing, etc.);
- Does not include a charter flight;
- Does not require staying overnight, unless there is a valid business reason for the additional expense;

**c. First Class, Business, or Economy Plus Airfare**

All Travelers are prohibited from booking first class travel. For Employees, business or economy plus airfare may only be approved if at least one of the following two bullet point conditions are met (your department or applicable funding source policy guidelines should always be followed if more restrictive than this Travel Policy):

- A flight segment has a scheduled in-air flying time in excess of four hours for economy plus and six hours for business class; or
- A medical justification has been documented and approved through the Executive Director for Campus Accessibility & ADA/504 Coordinator, who will then notify the appropriate V.P. or Dean.

When reserving in-policy seating upgrades, only the segment that meets the policy requirements may be upgraded, not the entire itinerary. When booking upgraded class seats by segments, you may need to call an agent for the best schedule and pricing, especially if flying international. The department head/Dean may approve the "EarlyBird Check-In" upgrade with Southwest Airlines.

- Students must travel economy/coach class regardless of duration or length of the flight, unless a request for reasonable accommodations has been reviewed and approved by the [Goldman Center for Student Accessibility](#) that necessitates an upgraded class seat.
- For Affiliates, booking first class is not allowed without approval of the Tulane University Travel Manager.

**d. Changes, Cancellations, and Unused Airline Tickets**

When travel plans change for any reason, the Traveler is responsible for notifying the University's currently approved travel agency to apply the unused ticket to the next business trip. When non-refundable tickets are cancelled, the Traveler will be issued a credit to use for future Tulane business travel. Airline

change fees may apply. If the Traveler has no upcoming business trips, the travel agency will apply the unused ticket on the university's behalf. Airline imposed penalties for changes to an airline ticket for business reasons or circumstances beyond the Traveler's control are reimbursable from university funds.

Tulane reserves the right to deny reimbursement or collect change penalties from Travelers if such changes are made for other than legitimate business purposes. Cancelled ticket credits may not be used for personal travel.

**e. Private Aircraft**

Tulane Travelers are prohibited from using non-commercial (e.g., private, corporate, state owned, rented, or borrowed) fixed-wing or rotary aircraft for university business travel. Exceptions require written approval in advance of committing to the travel from the [Office of Enterprise Risk Services](#).

**f. Airfare Requirements for U.S. Government Sponsored Travel and/or Grant-Funded Travel**

Travelers should refer to their project criteria and guidelines when travel is paid for by a U.S. Government Sponsor. For example, if a federally sponsored project pays for air travel, flying on a U.S. airline may be required (Fly America Act). Also, in some cases, the sponsor may require approval in advance for each foreign trip.

Travelers are responsible for adhering to grant travel restrictions. If the airfare rate exceeds the limit set forth under a grant, any excess rates above the grant rules must be charged to Tulane unrestricted university accounts.

Helpful links:

- Fly America Act (FAA) <http://www.gsa.gov/portal/content/103191>
- Open Skies Agreement <https://www.state.gov/open-skies-partners/>

**g. Baggage Fees**

Baggage fees that are Reasonable and appropriate for the purpose and length of the business trip are reimbursable. Tulane University will not reimburse fees for baggage that are personal in nature (e.g., golf clubs).

**C. Lodging**

**1. Lodging Reservations**

Travelers are required to use the Concur Travel online booking tool or contact World Travel Service directly to book hotel rooms. All hotel reservations booked through Concur are processed by the university's travel agency. Exception, if lower rates for accommodations are available using a negotiated conference hotel rate, this rate may be booked directly with the hotel through the conference housing or registration portal. Conference and meeting room rate discounts are the only exception for booking directly with hotels.

a. **Hotel Class and Rooms**

The class of hotel should be Reasonable and appropriate for the business purpose and location. Travelers should stay in standard or equivalent rooms. Room upgrades using rewards miles, credits, or personal payment methods would be considered a personal expense and not reimbursable.

The following hotel expenses are not reimbursable: in-room movies; mini bar expenses (unless the mini-bar items constitute breakfast, lunch, or dinner); laundry expenses on trips of 6 consecutive days or less; toiletries. All telephone calls from hotels should be made by cell phone unless you are dialing in for system access or in rare circumstances that you do not have cell phone service.

b. **Airbnb**

Tulane Travelers may use Airbnb for Tulane University business travel. The traveler must create a work profile within their existing personal profile with Airbnb, using their Tulane email address and T&E card if applicable. Airbnb rates may not exceed the GSA or USDOS per diem rates as found on [www.gsa.gov](http://www.gsa.gov) or [https://aoprals.state.gov/web920/per\\_diem.asp](https://aoprals.state.gov/web920/per_diem.asp) without permission from the Tulane University Travel Manager.

## **D. Ground Transportation**

### **1. Rental Car Reservations**

Tulane employees, students and Affiliates are discouraged from self-driving when traveling outside the U.S. as road conditions, laws, and driving norms in other countries can be very different from the U.S. Otherwise, employees must use Tulane preferred rental car vendors when booking rental cars. Travelers are required to use the Concur online booking tool or the university's travel agency to book rental cars. All car reservations booked through Concur are processed by the university's travel agency. Affiliates must use the university's Guest Travel Coordinator to book rental cars.

*When to book car rentals vs car services:*

Rental cars should be used when they are less expensive than alternative means of transportation (e.g., taxi, Uber, car service, personal vehicle, airline, or train) or when convenience or safety issues justify the additional cost. Uber/taxi services may not be used for trips over 50 miles, as renting a vehicle is preferred.

a. **Car Class and Features**

Tulane will reimburse rental cars up to a standard size. The maximum allowable rental class is standard sized cars. Vehicles in a car class above standard require Travel Manager Approval. GPS device upgrades must be approved in advance. Tulane will not reimburse the cost of any upgrades or accessories, such as a satellite radio, without prior approval of the Travel Manager.

b. **Car Rental Insurance for Business Travel**

When employees who rent vehicles **used solely for university business** book

through Concur and rent using the university's preferred rental car vendors (Enterprise and National), appropriate insurance coverage is included for domestic travel. Employees using their own personal credit cards for renting vehicles **used solely for university business** may use the preferred rental car vendors' Tulane corporate ID number, which will include insurance coverage for domestic travel. For vehicle rentals **used solely for university business**, the cost will be reimbursed.

Employees may not use the corporate ID number when a rental vehicle is used solely for personal use. When an employee is renting vehicles with a combined use for both personal and university business, the employee understands that they are personally responsible for any liability related to the use of a rental car under the Tulane corporate ID when used for personal rental days. The charges for those personal days of use should be charged to their personal credit card. Employees may not use a Tulane issued Travel and Entertainment (T&E) credit card for any personal use of rental vehicles. The university is not responsible for any costs associated with personal use of rental vehicles, which includes any deductibles as a result of a vehicle accident while driving on personal business. For clarity, insurance provided by the car rental agency due to its contract with Tulane will not apply to personal travel.

For employees renting vehicles **using non-preferred rental vendors solely for university business**, employees must purchase the supplemental liability insurance and the collision damage waiver insurance coverages. This applies to both domestic and international rentals. For vehicle rentals **used solely for university business**, the cost will be reimbursed.

When traveling internationally, the employee is required to purchase the locally required liability insurance coverage, including physical damage coverage. Costs associated with university business will be reimbursed. Tulane's foreign package auto liability insurance is excess of locally required auto insurance. For more details visit the [Office of Enterprise Risk Services](#) website.

When chartering (e.g., team sports, groups) ground transportation, continue to follow the instructions of Tulane's Shuttle and Transportation Department. No less than five business days in advance of the transportation date, Travelers must submit a Transportation Request Form online through the Shuttles & Transportation Department website at [shuttles.tulane.edu](http://shuttles.tulane.edu). For more details read the [Policy for Chartering Ground and Transportation Services](#) on the Shuttles and Transportation website.

c. **Fuel for Rented Automobiles**

Travelers shall decline the pre-paid fuel options and refuel the rental car prior to returning to the rental agency. Tulane will reimburse the cost of business-related fuel.

d. **Parking and Tolls (Rental or Personal Car Expenses)**

Tulane will reimburse all travel-related business tolls and parking charges with

appropriate documentation. Tulane will not reimburse tickets or fines associated with parking or travel violations and charges for vehicle lockouts.

## 2. **Personal Automobile**

Use of personal vehicles for business travel must be pre-approved by the Tulane Travel Manager. In the event the Travel Manager approves use of a personal vehicle, Tulane will reimburse the Traveler up to the [IRS authorized mileage rate](#) for miles incurred.

The mileage reimbursement covers all costs related to the operation of the vehicle, including service, maintenance, insurance, depreciation, and fuel. Tulane will not be responsible for any other costs associated with business use of a personal automobile, including but not limited to deductibles or premium increases due to an accident. Travelers should drive the most direct route, a copy of google maps mileage calculation is acceptable documentation for mileage reimbursement. For additional guidance or questions regarding mileage reimbursement visit the [Tulane Accounting Concur Resources website](#).

### a. **Personal Automobile Insurance**

Travelers who use their own automobiles or other individually-owned non-rented vehicles to conduct Tulane business are responsible for the automobile liability and physical damage associated with the operation of that automobile. The Traveler's personal insurance is primary in the event of an accident. Tulane's automobile liability policy may provide some excess liability coverage for limits above those carried by the vehicle owner who is an employee, depending on the circumstances and applicable laws. More information can be found on the [Office of Enterprise Risk Services](#) website.

### b. **Employee Commuting Versus Local Transportation Cost**

Tulane will not reimburse daily commuting costs to and from work. Tulane will reimburse local travel for business purposes that are beyond the daily commute to work with the approval of the employee's supervisor. Travel between uptown and downtown campuses and between home and local airports is normally not reimbursed, though supervisors may make exceptions to eliminate hardship conditions. Uber/Lyft may be allowed for local business travel if the service is for a legitimate business purpose (pre-approval documented) and the premium service is not used. Uber and taxi services should not be used when other options such as public transportation, Tulane shuttle service, or carpooling are available. Every effort should be made to minimize costs. Uber and taxi service should be the exception and not the rule.

## 3. **Bus or Rail**

Tulane will reimburse travel by bus or rail when it is less expensive than alternative means of transportation. Tulane will pay the cost of up to the lowest first-class accommodations available for the trip with the limitation that payment/reimbursement will not exceed the equivalent commercial airfare for the same trip. Equivalent airfare is coach class and at least a seven-day advance

purchase. Equivalent airfare comparison from Concur or a university travel agent, must be documented and included with the expense report.

## **VI. International Travel**

### **A. Additional Approvals for Trips to Travel Warning Destinations**

For Tulane-related International trips (outbound from the U.S.) to a Travel Warning Destination, additional health and safety approvals must be obtained by the Provost's Designee, see [Appendix B](#) to apply. The University will not support, finance, reimburse expenses, provide emergency services, or otherwise award credit for Tulane-Related International travel in a Travel Warning Destination unless Provost Designee approval is given before departure. Accordingly, international flights from the U.S. must not be booked and travel costs should not be incurred until this policy and all required University approvals are timely obtained.

See section [Appendix B](#) for additional details and implementing procedures.

### **B. Booking International Travel**

International Travelers, both outbound from the U.S. and inbound to campus, are required to use the Concur Travel online booking tool or World Travel Service to book international travel. Any other booking methods for international travel must be pre-approved by the Tulane Travel Manager.

### **C. STEP Registration**

Tulane Travelers also should register with their home country's embassy or state diplomatic service. This allows you to receive local security updates, and your country can aid you in an emergency. US citizens will register with the Department of State's [Smart Traveler Enrollment Program \(STEP\)](#).

### **D. Health Insurance**

All Tulane employees and students traveling abroad for Tulane-Related activity are required to have health insurance, with appropriate coverages both in the U.S. and while abroad. For Students, this can be met either by (a) enrolling in the Tulane's Student Health Insurance Plan, or (b) supplying evidence of another health insurance policy which will cover the student while abroad. [Click here](#) for details. It is the responsibility of each Traveler to check his/her insurance to confirm sufficient coverage abroad.

### **E. Supplemental Medical Insurance**

It is strongly recommended that Tulane employees and students engaged in Tulane-Related activity abroad purchase supplemental medical insurance. This can be done by separately enrolling in [GeoBlue Study Abroad Insurance](#), particularly when the Traveler's health insurance does not apply abroad or where it may be desirable to supplement existing health insurance.

When booking international travel, you must also follow the policies and guidelines located on the [Tulane Global](#) website, as well as any international travel policies set by your respective school, department, international program, study abroad, etc. International students must inform OISS (Office of International Students and Scholars) at least two weeks in advance when traveling outside of the U.S. Unfamiliarity with international policies (e.g., Departments, Schools, Tulane Accounting Management,

General Counsel, OISS, Controller's Office, and the Office of Enterprise Risk Services) is not a justification for noncompliance.

### **G. Passports and Visas**

For certain types of Tulane-Related international travel, Tulane may agree to pay or reimburse Traveler for actual costs to acquire a passport, visa, tourist card, necessary photographs, birth certificate copy, required and recommended inoculations, vaccinations/immunizations, health cards, and currency conversion fees.

### **H. Foreign Affiliate Travel to the U.S.**

Tulane may pay for foreign visitor travel, provided that such visitor enters the U.S. on an appropriate visa. In addition to the documentation required for all travel payments, request for payments to or on behalf of a foreign visitor must include a signed, approved (by the International Tax Office) Form LA-6, photocopies of the Traveler's passport, visa and i-94 card.

### **I. Cash Advances**

Cash advances on a personal credit card are never reimbursable. For information on the allowability of cash advances for international travel, see the [Tulane Accounting Concur Resources website](#).

## **VII. Meals and Entertainment**

Tulane will reimburse an individual's meals for approved Tulane-Related travel. There are two methods by which Tulane will provide reimbursement: per diem at the current rate set forth for the relevant geographic area by the GSA or USDOS per diem rates as found on [www.gsa.gov](http://www.gsa.gov) or [https://aoprals.state.gov/web920/per\\_diem.asp](https://aoprals.state.gov/web920/per_diem.asp) or actual expenses. The Traveler must pick only one method. For actual expenses, Travelers must provide itemized receipts and document the business purpose for the meals and/or entertainment in the expense report in order to have those expenses reimbursed. Meals are not reimbursable for travel with no overnight stay, unless preapproved by a V.P. or Dean. Under no circumstances may you approve your own meals and entertainment expenses. Foreign travel expenses for meals and lodging are payable by the same methods as domestic travel.

Entertainment/fund raising meals may not be paid during a trip charged to a sponsored grant or contract. Entertainment must be charged to unrestricted accounts.

For more details on submitting expense reports for meals, entertainment and per diem visit the [Tulane Accounting Concur Resources website](#).

## **VIII. Alcohol**

When traveling on university business, Tulane will not reimburse alcoholic beverages, unless pre-approved by a V.P. or Dean. Alcohol is never permitted for grant transactions unless expressly authorized by the sponsor.

## **IX. Miscellaneous Travel**

### **A. Athletics**

For additional information on policies and compliance requirements for athletics, please contact the program administrator who books travel for your sport.

### **B. Extended Travel for Sponsored Projects (over 30 days)**

For travel more than 30 days in one location, Travelers can choose to be paid for the actual and Reasonable cost of lodging and meals or a basic per diem allowance at the standard rate set forth for the relevant geographic area by the GSA or USDOS per diem rates as found on [www.gsa.gov](http://www.gsa.gov) or [https://aoprals.state.gov/web920/per\\_diem.asp](https://aoprals.state.gov/web920/per_diem.asp). Per diem rates after 30 days are at a reduced amount.

### **C. Non-business Travel Days**

Tulane may consider weekends, holidays, and other necessary standby days as a business expense if the dates fall between business travel days and if approved in advance in writing by a V.P. or Dean. If not, Tulane will consider those days personal, and those expenses are not reimbursable. Tulane may reimburse flights in full when adding personal travel to a business trip if the overall cost is the same or lower than the original approved business departure and return dates. In order to obtain reimbursement when personal travel is added to a business trip, the Traveler must document a price comparison by using Concur or Tulane's currently approved travel agency at the time of booking the airfare, showing the lowest fare available for the approved business departure and return dates. This comparison must be included in the Concur expense report. If using an agent, ask the agent to add the price comparison details to your purchased airfare confirmation, preferred.

### **D. Allowable Travel Days for Business Meetings and Conferences**

For domestic business meetings and conferences, Tulane will reimburse travel expenses for one day prior to the conference/meeting start date and one day after the end date ("Domestic Conference Travel"). For international conference travel, Tulane will reimburse travel expenses for two days prior to the conference start date (one day in country and one travel day) and one travel day after the conference end date ("International Conference Travel"). If the Traveler seeks reimbursement beyond what is allowed for Domestic or International Conference Travel, (e.g., they are a presenter or have other duties associated with the conference, meeting, or program), the additional travel must be approved in writing by the employee's travel and expense approver, prior to booking the travel and such approval must be attached to the expense report.

### **E. Remote workers**

Tulane may employ workers that work from remote locations. If such employees work

remotely 100% of the time, then occasional trips to campus for department meetings, projects, etc. may be paid at the discretion of the department's senior officer. Such payments would not be considered commuting payments.

#### **F. Employment Interview Travel**

Tulane will authorize travel expenses in connection with employment interviews when necessary to acquire key personnel for employment at the university and when booked by a Guest Travel Coordinator. Travel expenses in connection with interview travel are allowed when authorized by the appropriate personnel as designated in this policy. Travel expenses are allowed when authorized in a formal written invitation to the prospective employee, as long as they do not exceed the limits and are consistent with written policies and procedures in this guide. Travel expenses of spouses accompanying such prospective employees are also allowed to the extent authorized in the invitation.

#### **G. Travel Expenses of a Spouse**

Tulane will not reimburse a spouse's travel expenses unless approved in advance by a V.P. or Dean and the business purpose for the spouse's attendance is clearly documented. For sponsored funded arrangements, spousal expenses are only allowable if the sponsor allows for the reimbursement.

### **X. Miscellaneous Travel Expenses**

#### **A. Telephone Usage While Traveling**

Actual costs of Necessary and Reasonable business telephone calls, faxes, and computer connections are allowable costs.

#### **B. Travel to/from the Airport**

Tulane will reimburse Reasonable costs to travel to the airport.

To determine whether parking costs are Reasonable, parking costs should not exceed the cost of round-trip taxi fare or rideshare from your home or office to the airport. Travelers should reserve parking through Tulane's currently preferred parking vendor. Tulane will only reimburse parking costs for the departure city airport.

#### **C. Conference or Seminar Registration Fees**

Travelers may receive reimbursement for registration fees by making payment on a T&E card or by seeking reimbursement if paid on a Traveler's personal card after the trip is completed.

#### **D. Internet Access**

Internet access (e.g., hotel and airport), when Reasonable and Necessary is reimbursable. Travelers may not be reimbursed for in-flight internet access unless pre-approved in writing by a V.P. or Dean.

#### **E. Laundry Expenses for Extended Trips**

Travelers may seek reimbursement for Reasonable and Necessary laundry and dry-cleaning charges when travel exceeds six or more consecutive nights. For avoidance of doubt, laundry expenses are only reimbursable during the period of business travel.

**F. Global Entry & TSA Pre-Check Expenses**

A Traveler's TSA Pre-Check and the U.S. Customs and Border Protection Global Entry Program application fees may be reimbursed if pre-approved in writing by the V.P. or Dean.

**G. Tips and Incidental Expenses**

If expensing for travel using actual costs, Tulane will reimburse reasonable tips (15% to 20% for taxis and meals). Other tips (bellhop, valet, house cleaner, etc.) are reimbursed as part of the daily per-diem incidentals or actuals, not to exceed \$5 per day.

**H. Vaccinations**

Expenses for vaccinations required for business travel are reimbursable.

**I. Insurance**

Additional supplemental insurance separately purchased by a traveler outside of what the University provides, such as life, travel, flight, or baggage, will not be reimbursed by the University.

**J. Unallowable Expenses**

Expenses incurred related to university business should be Necessary, Ordinary, and Reasonable. Examples of non-reimbursable expenses include, but are not limited to the following:

- Babysitting
- Car service for normal commute
- Car washes and detailing
- Purchase of clothing, luggage, and toiletries
- Damages incurred to any form of lodging, rental accommodations, or vehicles as a result of engaging in activities not directly related to Tulane business
- Fines, credit card interest and fees, bank fees, late fees, etc.; however, foreign currency conversion fees are reimbursable
- Fuel for personal vehicle unless covered by mileage reimbursement
- Hair or shoeshine services
- Hotel or car "no-show" charges without a business purpose
- Personal membership dues (including airport club lounges)
- Magazines, newspapers while traveling
- Non-business postage
- Personal accident, property damage, and travel insurance
- Personal or in-room entertainment (e.g., sporting events, movies, games, etc.)
- Personal refreshments (e.g., mini bar, coffee, water, etc.) exceptions may be approved when substituted for meals
- Alcohol
- Pet care
- Prescription medication
- Souvenirs and personal gifts
- Vacation and personal expenses

## **XI. Other Travel Considerations**

### **A. Third Party Funded Travel**

When traveling on behalf of Tulane and your travel is funded in whole or in part by a non-Tulane entity, the travel booking, and management of the related expense should be conducted through Tulane's Concur instance whenever possible. If Tulane is paying 50% or more for the travel related expenses, the travel must be booked using Concur or Tulane's currently approved travel agency. Travelers must ensure that travel paid by third parties does not violate Tulane's Conflict of Interest Policy:

- Review the [Conflict of Interest Policy](#) requirements;
- Ensure you have obtained appropriate departmental approval; and

### **B. Airline and Hotel Reward Points**

Travelers may accept travel-provider rewards given to the Traveler for conducting Tulane business travel related to travel (e.g., Delta Sky Miles, Marriot Rewards, etc.). Under no circumstances under this Policy will paying additional expenses for the sole purpose of obtaining more rewards be considered Ordinary, Necessary, or Reasonable (e.g., purchasing more expensive tickets in exchange for higher reward points). Enrollment fees for these programs are a personal expense and are not reimbursable.

### **C. Business Travel Accident Insurance**

While traveling on university business, employees are covered by the university's business accident insurance policies. If a claim is incurred while traveling on university business, contact the Office of Enterprise Risk Services as soon as possible and provide all requested documentation found on the [Office of Enterprise Risk Services](#) website.

### **D. Accidents, Injuries, Thefts and Other Safety Issues**

Accidents, thefts, and other crimes that occur while traveling on university business must be reported immediately to the proper authorities, consistent with local/state laws. If theft of university property occurs or a Traveler is injured while traveling, the Traveler should contact the [Office of Enterprise Risk Services](#).

## **XII. Travel Expense Reporting and Supporting Documentation**

### **A. Expense Reporting Roles and Responsibilities**

#### **1. Employee/Student Travelers**

All employee/student Travelers are responsible for submitting and obtaining approval for the travel expense report.

#### **2. Expense Delegates**

An Expense Delegate:

- May assist with expense report creation, allocation of expenses, business justification and receipt attachment.
- Is responsible for notifying an employee when expense report is ready for review and submission.
- For Affiliates, is responsible for obtaining a W-8 or W-9 and submitting with a

check request.

### 3. Expense Report Approvers

An Expense Report Approver is responsible for:

- a. Reviewing expense reports and receipts to verify that all expenses are Ordinary, Necessary, and Reasonable and are adequately substantiated.
- b. Requesting further documentation or explanation for expenses that appear to be excessive or unusual in relation to the nature of the expense. Explanation of such expenditures must be included within the expense report.
- c. Expenses conform to requirements imposed by the Internal Revenue Service.
- d. Approving or Approve and Forward (if outside of financial purview) the expense report in Concur, thereby attesting to the appropriateness of expenditures.

#### B. Substantiation and Original Receipts

In order for Tulane to approve and reimburse a travel expense, an employee/student Traveler, Expense Delegate, or Guest Travel Coordinator must properly substantiate the expense. Original itemized receipts, photos of original receipts, or scanned images are required for all expenditures. For specific instructions regarding the submission of expense reports, see the Expense Reporting Policy on the [Tulane Concur Resources Website](#). Appropriate receipts should include transaction amount, itemization of goods or services purchased, method of payment (e.g., receipt showing last 4 digits of card number), date and merchant name. If sponsor or departmental requirements are more restrictive, that policy will take precedence.

#### C. Travel Meal and Entertainment Documentation

The Internal Revenue Service requires all business meals and entertainment expenses include:

- Original itemized receipts or photos of original receipts sent using Concur Mobile
- Proof of payment
- Supportive Documentation (e.g., flyer or invitation)
- List of attendees with titles and affiliations or identification of a discernible group
- Number of attendees, geographic location, and business purpose

For more details on submitting expense reports visit the [Tulane Accounting Concur Resources](#) website. If sponsor or departmental requirements are more restrictive, Travelers must adhere to those requirements as well as this policy.

If an itemized paid receipt is not available and the amount is over \$75, it is expected that a missing receipt affidavit will be completed and filed with the expense report. For IRS compliance, individuals must submit original itemized receipts for reimbursement. A missing receipt affidavit (MRA) should be submitted in lieu of missing receipts. For missing receipts pertaining to Lodging, Airfare, and Rental Cars, rather than completing an MRA, a Traveler should contact the provider to obtain the receipt. If individual travel meal receipts are missing, you must claim per diem for the entire trip. Federal Meal per diem rates must be used for all travel meals claimed on the MRA. If a copy of the

receipt is obtained later, the receipt can be uploaded to the expense report, and the MRA can be deleted from the report. Essential business elements (Who, What, When and Where) must be included in the comment section of the transaction. The MRA is to be used as an exception and not the rule.

#### **D. Reimbursement of Sales Tax**

Tulane University is recognized as a non-profit educational institution and is exempt from sales tax on most purchases. The exemption documentation and a chart of the current sales tax exemptions are located on the [General Counsel's website](#). Please contact the Office of the General Counsel for additional information on state sales tax exemptions. These exemptions are not applicable for goods/services purchased for personal use or with personal funds.

Employees and students should make every effort to determine whether a sales tax exemption applies.

#### **E. Reimbursement Approval**

Expense reports must be approved online through Concur for each reimbursement. The person who incurred the expense is responsible for obtaining the preapproval for each expense and to review their expenses, confirming that the report complies with all the university expense and travel policies. No individual may approve expenses for themselves or for their supervisor(s), whether they report to this supervisor directly or indirectly. Unfamiliarity with Tulane's policies is not a justification for noncompliance.

#### **F. Tulane Travel and Entertainment Card (T&E Card)**

The policy and guidelines for the T&E card are found on the [Corporate Travel & Entertainment Card Policies & Procedures](#) website.

#### **G. Timing of Expense Report Submission**

The cardholder is responsible for ensuring that all Tulane Company Card transactions are reviewed and assigned to a Concur Expense Report within 30 days of the transaction or return from travel date.

Furthermore, business expenses must be submitted within certain time limitations in accordance with IRS Publication 463. These time limitations determine whether the cost may be reimbursed by the university as a business expense and whether the reimbursement will be treated as taxable income to the employee. Additional details can be found at [IRS Publication 463](#).

If an expense report is submitted more than 45 calendar days after the expenses were incurred or after returning from travel, the request will be reviewed and if determined to be taxable will be reported to payroll as taxable income. Accounts Payable requires all departmental expenses to be submitted at the end of each month and no later than the 15<sup>th</sup> of the following month.

For more details on submitting expense reports visit the [Tulane Accounting Concur Resources](#) website.

## H. Violations of this Policy

Violations of the travel policy may result in any or all of the following actions:

- a. Denial of reimbursement;
- b. Recoupment of non-reimbursable expenses from the Traveler and/or department;
- c. Any disciplinary actions included in relevant Tulane policies and handbooks.

Report violations, issues, or concerns to Tulane Travel Manager

## I. Recoupment of Unallowable Expenses and Dispute Resolution

Violations of the travel expense policy may result in the recoupment of unallowable expenses from the employee through a payroll deduction or check deposited by employee with Accounts Payable. In situations where an employee submits a personal item as a business expense, the employee will be notified, and possible disciplinary actions will ensue. Any fares booked in excess of the lowest available airfare are considered a violation of this policy and are not reimbursable. Excess costs associated with the same class as the lowest available as defined above may be expensed to the department, but the department should consider whether a benefit has been conferred on the Traveler. If so, then such benefit should be reported as taxable income to the payroll office.

Alternatively, the department may require that the Traveler reimburse the department for the excess amount. Any reimbursements submitted by a Traveler for personal expenses charged to a T&E credit card must be included in the Traveler's Concur expense report.

## J. University Travel References

[Office of Enterprise Risk Services](#)

[Tulane Accounting Concur Resources](#)

[Corporate Travel & Entertainment Card Policies & Procedures](#)

[Policy for Chartering Ground and Transportation Services](#)

[Office of International Students and Scholars](#)

[Export Controls Office](#)

## K. Sources of Help

- For questions regarding the travel policy and travel expense reports contact one of the following:
- University Travel Program Manager, Laney Armstrong at [larmstro@tulane.edu](mailto:larmstro@tulane.edu)
- Accounts Payable Office at [TulaneAccountsPayable@tulane.edu](mailto:TulaneAccountsPayable@tulane.edu)
- University Controller's Office at [TulaneControllersOffice@tulane.edu](mailto:TulaneControllersOffice@tulane.edu)
- [FAQs](#)

## Appendix A

### Reimbursable Checklist

Expense Items	Reimbursable	Non-Reimbursable	Reimbursable with Exception or Approval	Comments
<b>Air Travel Related Expenses</b>				
Airline club memberships		X		
Seating class upgrades and early bird check-ins			X	According to policy.
Seat assignments for aisle or window seats			X	When in compliance with standard class of service and fee exists for all window/aisle seats (i.e., Air Canada Tango, WestJet, U.S. Carriers, & Porter)
In-flight entertainment		X		
Travel insurance		X		
Non-refundable ticket change fees			X	May not be charged to Federal awards since tickets are usually required to be unrestricted
TSA Pre, Global Entry Programs, etc.			X	According to policy.
Luggage replacement		X		
Luggage - checked	X			Customary and reasonable expenses; more than 2 pieces of luggage require written explanation on expense report
Passport/visa services (for business travel)	X			
Wireless internet			X	According to policy
<b>Lodging Related Expenses</b>				
Extended stays > 30 days	X			According to policy
Stays < 30 days	X			According to policy
Dry-cleaning or laundry expense < 6 days		X		
Dry-cleaning or laundry expense			X	For business trips 6 days or more in duration

Expense Items	Reimbursable	Non-Reimbursable	Reimbursable with Exception or Approval	Comments
Lodging or conference cancellation charges, late fees or No-Show fees			X	Exception approval according to policy
Hotel room upgrades		X		
Spa services		X		
Hotel Health Club/Fitness center fees		X		
Tips (bellhop, house cleaner, etc.)	X			Reimbursable as part of daily per-diem or actuals not to exceed \$5/day
In-room movies		X		According to policy
Mini-bar charges			X	
Wireless or wired internet	X			When not included in the nightly rate at an approved property and used for university business purposes
<b>Ground Transportation Related</b>				
Car rental expense	X			For university business travel only
Traffic and parking fines/violations		X		According to policy
GPS system rental			X	
Parking fees	X			To/from business meeting; normal commute must be deducted, refer to policy
Personal car mileage	X			
Rail charges	X			
Taxi charges	X			Associated with business travel, refer to policy
Toll charges	X			
Toll fee technologies	X			(i.e., EZ Pass, etc.)
Transportation from employee's home to office		X		
<b>Meals &amp; Entertainment</b>				
Entertainment			X	According to policy
Meal expense associated with business discussions	X			According to policy

Expense Items	Reimbursable	Non-Reimbursable	Reimbursable with Exception or Approval	Comments
Meal expense with NO overnight stay (local travel)			X	According to policy  Tips must not exceed 20% of the meal cost
Meal expense with overnight stay	X			
Tips	X			
<b>Credit Card</b>				
Personal credit card fees		X		The travel card is to be used for all university business expenses
Cash Advances		X		
<b>Other</b>				
Briefcase replacement if lost or stolen while traveling on business		X		Refer to Enterprise Risk Services
Clothing purchase or replacement if lost or stolen		X		Refer to Enterprise Risk Services
Personal items		X		
Doctor fees/Medical fees/Prescriptions		X		
Immunizations (for overseas business travel)	X			Refer to <a href="#">CDC Travel Health Website</a> further information
Spouse travel business purpose			X	
Spouse travel non-business purposes		X		
Travel insurance		X		

## Appendix B

### International Travel Procedures for Travel Warning Destinations

#### Procedures for Requesting Approval to travel warning destinations.

##### A. Applications

After appropriate Unit approval of contemplated International Travel exists, Tulane trip leaders (on behalf of the traveling group) or individual Faculty/Staff/Students seeking to Travel to a Travel Warning Destination must request and obtain advance University permission before proceeding with the activity.

Complete the [High Risk International Travel Form](#) (ITF) and submit it to Tulane's Global Team for evaluation (preferably 90 days in advance for study abroad and 30 days for all other travel). The Global Team assists the Provost's Designee to vet requests for Tulane-Related Travel to a Travel Warning Destination and to decide whether to allow travel to proceed, or to suspend or curtail ongoing activity when health, safety or security concerns emerge.

The ITF submission must document why the trip is justified, academically or otherwise, and why the International Travel serves an Essential purpose for the University.

The ITF must specifically indicate how the Activity and related Travel are Essential and address activity-and location-specific risks and concerns as identified in applicable Travel Advice.

##### B. Review Process

Tulane's Global Team reviews ITF submissions. As appropriate, the Global Team will refer requests to Tulane's International Group (ITG) for enhanced vetting. ITF submissions ultimately are escalated for a final decision by the Provost's Designee.

In deciding whether to approve Tulane-related travel to a Travel Warning Destination, the University will consider the following factors:

- Whether the activity and related travel serves an essential academic or business purpose of the University;
- The educational, research, professional development, or business/administrative importance of the activity in relation to the Traveler and Tulane;
- The type of Traveler (i.e., undergraduate, or graduate students; Post Docs; or employees);
- Traveler experience, both in general and related to the specific country and relevant risks;
- Alternative activity options and why they cannot be chosen;
- The level and type of risk for the destination;
- Geographic location of the contemplated activity, its relation to the threats identified by travel advice, and whether the activity can be effectively completed in light of a destination's risks;
- The political and physical conditions in the site country;
- Steps to taken to eliminate or minimize the threat;
- Travel conditions and the ability to evacuate Tulane Travelers, if necessary; and
- The manageability of risk to the University.

When vetting requests, Tulane considers information from multiple, objective, and reliable sources, including governmental Travel Advice (e.g., the USDOS, CDC, the U.S. Department of Homeland Security ([HHS](#)) and the World Health Organization ([WHO](#)), the University's international emergency service provider, University insurance carriers, and other expert sources).

Upon reviewing the submitted materials, the Provost's Designee may require applicants to take additional risk mitigation steps and/or alter their travel plans as a condition of approval.

### **C. Approved Requests**

If a request is approved by the Provost Designee, the Traveler will be required to sign location- and travel-specific forms (i.e., Students sign an Assumption of Risk and Release of Liability acknowledging the enhanced risks; and Faculty/Staff sign an Acknowledgment of Risk). The Provost Designee (with input from the ITG) retains the right to place conditions on such approval (i.e., prohibit certain aspects of the proposed itinerary or require additional or enhanced safety, security, or health measures). The Provost's Designee or Dean may withdraw its approval should the activity or Travelers fail to adhere to required conditions.

Once Provost Designee approval exists for trips to a Travel Warning Destination, then such approval applies to future recurring Tulane-Related travel to the destination provided there is no substantial increase in health, safety, or security risk for the destination.

### **D. Denied Requests**

If a request is denied, then Tulane support for the activity does not exist and International Travel should not proceed. This means that the activity will not be eligible for Tulane course credit; University funding is denied; Students are not eligible to receive financial aid; Tulane's insurance does not attach to the activity; Tulane administrative and emergency response support will not be provided; and use of Tulane name, logos, and websites is prohibited.

If the applicant moves forward with denied International Travel requests, then he/she does so with the understanding that it is in not Tulane supported, sponsored, or affiliated.

### **E. Sudden Change of Condition; Suspension of International Activity**

The University reserves the right to suspend or cancel International Travel under this policy should a determination by the Provost Designee or Dean be made that the situation in a Travel Warning Destination deteriorates to a level that is no longer acceptable from a health, security or safety standpoint or is not Essential Travel. In such cases, the Travelers understand that the University is not responsible for reimbursement for expenses and costs related to curtailment of activities and departure from the affected Travel Warning Destination beyond the departure parameters established by the Provost's Designee or Dean.

### **F. Financial Responsibilities**

Tulane does not assume responsibility for financial risks associated with participation in its education abroad opportunities. If the University cancels a program before departure or while the program is in progress for reasons beyond its control including, but not limited to, political unrest or danger to participant safety, changes in travel risk rating by the USDOS, CDC, WHO, or Tulane's international emergency service provider, only those recoverable fees or tuition refunded to the University by service providers and/or institutions will be returned to participants. The University will make reasonable efforts to obtain refunds from applicable service providers and/or institutions, but no refunds are guaranteed. In addition to lost fees and tuition, participants may incur additional travel expenses in connection with program cancellation. Participants may or may not receive academic credit if a program is canceled. The University assumes no responsibility for the financial or other losses of program participants resulting from program cancellation.