Elementary and Secondary Education Act (ESEA)
Travel Costs Guidance

Purpose

Several grant programs under the Elementary and Secondary Education Act (ESEA) allow reimbursement for grant related travel. This document will provide information regarding reimbursement of travel costs.

Allowability and Allocability

1. Is the activity for which the travel is taking place "reasonable and necessary" to carry out the intent of the ESEA program? 2 C.F.R. §200.403 and 2 C.F.R. §200.403
2. To what extent are the travel expenses charged to a particular grant program benefiting the program? 2 C.F.R. §200.405(a)
3. If the travel expenses are for professional development activities, do the activities and personnel attending meet the definitions found in ESEA Section 8101(42) and ESEA Section 8101(44)?

Program Budget

1. Have all the travel expenses been included in the ESEA Consolidated Application?
2. Has the ESEA Consolidated Application received approval from the Oklahoma State Department of Education's (OSDE) Office of Title Services (OTS)?

Local Educational Agency (LEA) Travel Policy and Procedures

LEAs are required to have a written board approved travel policy that meets the requirements found in the Uniform Grant Guidance 2 C.F.R. §200.475 and Oklahoma Statute Title 70, Chapter 1, 5-117. Additionally, LEAs should implement internal controls to ensure the travel policy is followed with written procedures. Internal controls must be in place to ensure activities are allowable, allocable, reasonable, and necessary.

1. Does the district have a written board approved travel policy that meets the requirements of the Uniform Grant Guidance 2 C.F.R. §200.475 and Oklahoma Statute Title 70, Chapter 1, 5-117?
    a. Are transportation expenses addressed?
    b. Are lodging expenses addressed?
    c. Are subsistence expenses addressed?
    d. Does the district include reimbursement for temporary dependent care in the policy?
    e. Are travel expenses reimbursed on an actual cost basis, per diem and mileage basis in lieu of actual costs, or a combination of the two?

2. Does the travel policy or accompanying procedures provide the following information to demonstrate the travel expenses are necessary, reasonable, and allocable?
    a. What internal procedures are in place to request, review, and approve travel expenses?
    b. What internal procedures are in place to ensure travel agent fees are reasonable?

c. What internal procedures are in place to ensure any tax exemptions are applied to lodging receipts?
d. What mileage reimbursement rate is used?
e. What lodging rate is considered reasonable?

The Oklahoma State Department of Education (OSDE) recommends the LEA use the United States General Services Administration (GSA) rates as reasonable and necessary.

Lodging Taxes

In-State Travel

For in-state travel districts should consider making all lodging reservations on a credit card issued to the district so the district may provide the lodging establishment with the tax exemption number.

If the district policy does not use a credit card issued to the district for lodging expenses, then the district may reimburse an employee or private school employee for hotel taxes for both in-state and out-of-state lodging.

For a district policy that requires employees to pay up front for lodging (with reimbursement to follow) the in-state lodging tax may be an allowable cost as the lodging establishment may (not required to) honor the district's state tax exemption since the employee is using their own personal credit/debit card.

For a district policy that requires employees to pay up front for lodging (with reimbursement to follow) the in-state lodging tax may be an allowable cost as the lodging establishment may (not required to) honor the district's state tax exemption since the employee is using their own personal credit/debit card.

Out-of-State Travel

Oklahoma's tax exemption status does not apply to any other state's lodging tax. The out-of-state lodging tax is an allowable cost.

Travel Crossing Fiscal Years

Travel that begins on or before June 30th and ends on or after July 1st is defined as Cross Fiscal Year Travel.

When this occurs, two accounting codes, one for each fiscal year, should be included in the travel authorization. Example: A traveler will attend a conference from June 27 to July 3. Travel expenses incurred June 27 through June 30 will be paid with current fiscal year funds. Expenses incurred July 1 through July 3 will be paid with the subsequent fiscal year funds.

Round trip transportation tickets will be charged to the current fiscal year, whether obtained using a centrally billed travel account or individual-billed travel card.

Obligation

Although 34 CFR 75.707 and 34 CFR 76.707 specify that travel costs are obligated when the travel takes place, Oklahoma LEAs must prioritize compliance with state school finance laws and Oklahoma Cost Accounting System (OCAS) when handling expenditures. According to state regulations and OCAS guidelines, districts are required to recognize expenditures based on when the payment is made. Consequently, districts cannot postpone recognizing an expenditure to match the federal definition if the payment has already occurred in a prior fiscal year.

Fees

Fees for travel insurance are not typically considered a necessary expense.

Travel agent fees are reimbursable as long as the amount is reasonable for the services provided.

Equitable Services to Nonpublic Schools

Travel expenses for allowable professional development opportunities may be reimbursed to nonpublic school teachers and other school leaders - definition found in ESEA 8101 (42) and (44).

The public school district may not reimburse the nonpublic school for travel expenses. The public school district will pay the vendor directly for registration, airline, and lodging expenses.

Reimbursement for per diem or specific meals and incidental expenses must be made to the individual nonpublic school teacher or other school leader. The reimbursement method should be the same as the public school district uses for employees of the public school district.

General Travel Reimbursement Request Tips

1. An itemized, $0 balance lodging receipt should be retained on file with the travel claim at the LEA.
2. A unique purchase order must be established for each vendor being paid (e.g. John Smith, Susan Johnson, McDonalds, Southwest Airlines). A credit card is the form of payment, not the vendor.
3. If necessary, airfare, one night deposit for hotel reservations (if applicable), and conference registration may be paid in advance.
4. When requesting reimbursement for travel expenses (airfare/hotel/per diem) in the same month as the registration fee, the individual registration invoice for the traveler will suffice as claim documentation. All other documentation must be retained by the LEA/organization for monitoring or audit and may be requested during the claim review process.
5. If the airfare/hotel/per diem/real-time expenses are paid on different claims, the registration invoice/agenda with participant names must be submitted again with the new claim and again, all other documentation must be retained by the LEA/organization.

Resources

United States General Services Administration (GSA) Frequently Asked Questions

Federal Travel Regulations – Taxes and Per Diem Rate (recommended not required for non-federal entities)

Reasonable Costs

Travel Costs