



EXPENSE REIMBURSEMENT AND TRAVEL POLICY

The Internal Revenue Service (the IRS) has issued Publication 463, "Travel, Gift, and Car Expenses," which describes the underlying regulations in Section 162 of the Internal Revenue Code (the Code). This is the primary source for the Foundation's Expense Reimbursement and Travel Guidelines.

In the regulations, the IRS states that meals, hotels, and entertainment expenses cannot be "lavish or extravagant." The IRS also requires all businesses, whether for-profit or not-for-profit, to reimburse employees for travel and entertainment expenses under "an accountable plan."

What is an IRS "Accountable Plan"?

Treasury Regulation 1.62-2 sets for the rules for an Accountable Plan. The payee must (1) establish the business purpose and connection of the expenses; (2) substantiate the expenses claimed within a reasonable period of time; and (3) return any amounts to the payer which exceed the substantiated business expenses within a reasonable period of time.

Amounts that exceed the substantiated business expenses or are not accounted for within a reasonable period of time are reportable to the IRS on Form W-2 and subject to withholding of employment taxes.

To be compliant with IRS regulations, the Foundation has prepared the following accountable travel expense reimbursement plan. Any expenses that are not in compliance with an Accountable Plan will be considered taxable to the employee and reported as wages on their IRS Form W-2.

Business Expense

A business expense must be ordinary, necessary, allowable and appropriate.

- **Ordinary:** common and accepted for universities.
- **Necessary:** helpful in carrying out the mission of the university.
- **Allowable:** permitted under IRS regulations and university and foundation policies
- **Appropriate:** suitable for a valid business purpose and defensible under audit or public scrutiny (e.g., Would you be comfortable reading about it in the newspaper? Explaining it to a donor?)

NOTE: Expenses must not be lavish or extravagant.

Employees should submit expenses for reimbursement within 30 days of the expense, or in the case of travel, within 30 days of the return date of your trip. Expenses MUST be submitted for reimbursement within 90 days or may not be reimbursed.

All Foundation for Scalia Law credit card transactions should be reconciled and approved (by both cardholder and approver) by the 10th of the following month. Failure to do so could result in suspension of cardholder privileges.

What is a Valid Business Purpose?

Purchases or reimbursements made on behalf of the university must include a clear business purpose that answers:

- **Who** requested or participated (include attendees at events)?
- **What** was purchased?
- **When** did the event or activity take place? (include all relevant dates)
- **Where** did the event or activity take place? (if travel is included, include benefit to the university)
- **Why** was the purchase necessary, reasonable, and appropriate?

The business purpose must be specific enough that a third-party reviewer can understand it. *"Dinner with donor (ID# 123456) on 8/5/2025 to discuss alumni event ideas"* is an appropriately documented business purpose. *"Dinner with donor"* is not because the business purpose may be obvious to the employee, proxy, and/or payee, but not to a third-party reviewer.

Receipt Substantiation Requirement

Receipts should be provided for all expenditures. For any expenditure exceeding \$25, a detailed, itemized receipt is REQUIRED. In cases where a receipt is missing, all reasonable efforts must be made to obtain a duplicate. If a duplicate receipt cannot be obtained, an FSL Missing Receipt Affidavit must be submitted in place of the receipt for any expenditure over \$25.

Air & Rail Transportation

The Foundation will reimburse the cost of airplane or train tickets in coach/economy class only. Except as provided below, first class and business class air and rail travel are not reimbursable.

Air travel

Business class air travel is only reimbursable (**with supervisor pre-approval**) under the following circumstances:

- The travel is to Western Europe and the business meeting is conducted within three hours of landing;
- The travel is for transoceanic, intercontinental trips of more than eight hours;
- The traveler pays the difference if the receipt shows the coach rate BEFORE upgrade

Travelers should book air travel at least 21 days in advance. All efforts should be made to obtain the lowest available fare, while considering trip requirements such as arrival and departure times, meeting schedules, and reasonable route durations. Nomenclature for fare class will vary across airlines, but includes Economy, Coach, Wanna Get Away, and Main Cabin. Under special circumstances (a meeting that is likely to be changed several times, for example), you may request approval from your supervisor in advance to purchase a refundable ticket; the easiest way to provide that documentation is to include a copy of the e-mail chain.

Any flights which occur beyond a day before or a day after the business travel must include a cost comparison against the business travel dates. The employee shall pay any excess fares via a reduction of their reimbursement.

For electronic tickets, please request a receipt when obtaining boarding passes. If that is not possible, submit the web page printout or confirmation letter that is e-mailed to the employee and the boarding passes for each leg of the trip. For paper tickets, please provide the last page of the airline ticket (passenger receipt) as receipt for the trip. Please submit documentation showing the name of the person traveling, the dates of travel, the destination, and the cost of the ticket, including proof of payment (e.g., a receipt indicating the use of a credit card to make payment.)

Most airlines have instituted and strictly enforce rules regarding the number, size and weight of bags allowed for each passenger. Some airlines charge additional fees for services, such as checked baggage. Travelers should be aware of these fees and associated limitations and consider the total cost when selecting the most appropriate carrier. These fees are reimbursable with a receipt when limits must be exceeded for legitimate business purposes. A valid business purpose must be provided when requesting reimbursement for two or more checked bags (for example, checked baggage required to carry equipment or presentation/conference materials). Additional baggage fees for personal items will not be reimbursed.

Train travel tickets will be reimbursed at the coach class rate. As coach seating is not available on the Acela Express, these tickets will be reimbursed at the business class rate. Otherwise, business class reimbursement may be approved by the employee's supervisor.

Additional Travel Fees

Some airlines now offer enhanced economy/coach options (e.g., extra legroom seating, advanced seat selection, early bird/priority check-in, and in-flight Wi-Fi). Such enhancements are allowable providing the following conditions are met:

- The cost is not considered lavish or extravagant (i.e., must be ordinary, necessary and appropriate)
- There is a valid business purpose for the enhancement
- A clear and detailed statement outlining the valid business purpose (and reasonableness of the cost therein) must be provided as substantiation.

Premium Economy (a separate cabin) requires pre-approval by the employee's supervisor unless specifically authorized by policy for long-haul travel.

Business class is not reimbursable without written pre-approval.

Any exceptions or amounts above these thresholds require prior approval from the employee's supervisor.

Getting to the Airport

- Reimbursement for fares to/from the airport to home cannot exceed the cost from the individual's university office to/from the airport. Fares will not be reimbursed if the total mileage to/from home to the airport is equal to or less than a work day commute to/from home to the university office.
- Be reasonable in rideshare expenditures. If round-trip rideshare fare will be more expensive than driving, consider using a shuttle service or your car instead. Rideshare fare in excess of \$100 will require written justification, and may not be approved.
- If you drive to the airport, you may submit your parking (economy or long-term parking only) with appropriate receipts.

Travel Agencies and Ticketing Fees

The Foundation does not have an official travel agent. Employees are free to choose the travel agent they wish to work with or deal directly with the airlines/hotels or purchase transportation/lodging online. Reasonable efforts should always be made to find the lowest possible airfare.

When attending a conference or professional meeting, employees should check the group airfare rate negotiated by the event sponsor. Often, these group rates are quite a bit lower than fares that can be obtained directly from the airlines or through a local agent.

Discounts are often available through AAA, AARP and other personal and professional organizations. The Foundation cannot pay for personal memberships, but if these discounts are available, the Foundation encourages the employee to use them and appreciates the effort to minimize travel costs.

Travel Insurance

Travel insurance (personal injury or loss, trip interruption/cancellation, etc.) is not reimbursable.

Spouse or Companion Travel

Reimbursement for a spouse traveling on business is closely regulated by the IRS. In the event a spouse, companion, child, etc. travels with the employee, any increased costs must be paid by the employee (e.g., air travel for companion, meal costs, etc.) or would be considered taxable income to the employee and must be pre-approved. Documentation of the pre-approval must be submitted along with the receipt.

Frequent Flyer Miles

Employees may retain frequent flier miles earned while traveling for the Foundation. Individuals that use frequent flyer miles will be reimbursed 75% of the actual cost of a 21-day advance coach class airfare ticket.

International Travel

All international travel (including travel paid with Foundation funds) requires a Pre-Approval submitted and approved by the traveler's supervisor and the associated budget approver before travel. US Territories (US Virgin Islands, Puerto Rico, Guam, American Samoa and the Northern Mariana Islands) are not considered International Travel.

George Mason University's Office of Research Integrity and Assurance (ORIA) must approve, in advance, when international travel is:

- To a comprehensively sanctioned country or region (See [Export Controls - Office of Research Integrity and Assurance](#) for the list of countries/regions)
- To a militarily embargoed country (list of these countries available at: (http://pmddtc.state.gov/embargoed_countries/ or email export@gmu.edu for assistance) for any traveler who works with data controlled by the International Traffic in Arms Regulations (ITAR).

Please consult the ORIA website for more information: <https://oria.gmu.edu/topics/export-control/> or email export@gmu.edu prior to travel:

- If the traveler plans on taking university owned laptops or other equipment or would like to reserve a loaner.
- If the traveler has planned meetings to discuss potential collaboration or research or is attending a conference and will be meeting with individuals so that ORIA can assist with screening.

GMU's Office of Risk Management has details/links to the US Department of State travel advisories, details regarding international travel, and information about insurance and safety abroad. See <https://risk.gmu.edu/> or email risk@gmu.edu if you have any questions. For travel to hazardous areas or sanctioned countries, *please see [Hazardous Areas – International Travel](#) for information on submitting an application to the University Travel Advisory Committee (UTAC).*

Departments intending to invite residents of foreign countries to travel at the Foundation's expense must consult with the International Tax Office (inttax@gmu.edu) before inviting the individual to travel or making any travel preparations on the visitor's behalf. ORIA can also help with screening any international visitors. Email export@gmu.edu for assistance.

Currency Exchange and ATM Fees

The Foundation will reimburse employees for currency exchange fees. In most cases, using an ATM machine will provide an excellent exchange rate and will reduce the amount of cash the employee has on his/her person. ATM fees for cash withdrawals will be reimbursed.

Ground Transportation

Personal Vehicles

Depending on the circumstances surrounding the employees' business travel, the employee may use their own vehicle or rent a vehicle through a commercial agency.

The Foundation will reimburse transportation costs for travel to a destination to conduct university business. An employee can either rent a car through a commercial rental agency, or the employee will be reimbursed for business miles driven in a personal vehicle at a rate set annually by the IRS.

- To obtain mileage reimbursement, substantiation must be provided stating the start location, destination and actual miles traveled.
- Mileage reimbursement may never exceed the cost of available alternate transportation, e.g., the reimbursement for mileage cannot exceed the lowest train or airfare available.
- In cases where the employee elects to drive rather than travel by plane or train, the lower of the available alternatives will be reimbursed to the employee.
- Employees cannot request mileage reimbursement and charge for gas or other vehicle related expenses. The mileage rate paid by the Foundation includes reimbursement for such expenses.
- If an employee combines personal and business travel when using a personal vehicle, only mileage for business travel will be reimbursed.

Mileage Rate

The mileage rate for the use of a personal vehicle, when driven less than 280 miles per day, is equal to the IRS standard mileage rate for the calendar year in which the expense is incurred. The mileage rate as set by the university for the use of a personal vehicle when driven more than 280 miles per day is currently \$.246 per mile.

Local Travel

Non-commuting travel expenses may be reimbursed when individuals must travel in the local area on official business. This includes trips between university campuses or to other locations in the vicinity to attend meetings, training classes etc. Travel may be by personal vehicle or local common carrier (e.g., metro, bus, etc.). Parking fees and/or toll charges associated with these non-commuting expenses may also be reimbursed. See the standard mileage rate (for use of personal vehicle) in the section above (Automobile – For Business Travel).

Commuting Mileage

Commuting miles (or transport expenses) are defined as the normal daily roundtrip distance traveled between an employee's residence and their primary work location. Commuting miles/expenses are not reimbursable, and employees should deduct the mileage/expenses of their normal commute when submitting for mileage/expenses for local travel from their residence to the business destination.

Rental Car

Employees should rent a car only when it is required for daily use at the business destination or there is no other less expensive means of transportation from the airport/train station or from the point of origin to the business destination. If an employee rents a car and uses it partially for business and partially for personal use, the cost of the car must be prorated. Employees should

rent a car of an appropriate size based on the number of employees traveling. Rental car reimbursement will not exceed the cost of economy or mid-size class rate.

The following rental options are unallowable:

- Upgrades to luxury vehicle rentals (Audi, Bentley, Jaguar, BMW, Mercedes, Tesla, etc.)
- Upgrades to heavy-duty trucks, campers, trailers, motorcycles etc.
- Rentals from Turo, non-traditional sources, and vehicle rentals from friends, colleagues or relatives.

When returning a rental vehicle, please ensure that the vehicle has been fully refueled so that no fuel charges are assessed after the car is returned. **Fuel purchased or assessed at or by the rental agency is not reimbursable.**

Insurance on Rental Vehicles

- Employees: The Commonwealth provides a statewide self-insured plan for employees. Therefore, employees will not be reimbursed for rental car insurance for locations within the United States, and employees should decline liability damage waiver (LDW) and collision damage waiver (CDW) insurance for travel within the United States. Other forms of insurance such as personal accident insurance (PAI) are also prohibited.
- Non-Employees: A traveler who is not a state employee should determine whether their personal automobile insurance provides coverage on rental vehicles. Reimbursement for insurance charges will only be made for those individuals without such coverage.

Taxi, Ridesharing (Uber/Lyft), Shuttle Service

Transportation expenses for business travel are allowable for the usual fare plus a reasonable tip for a taxi, rideshare service (e.g. Uber, Lyft), or shuttle service. In accordance with university policy, a "reasonable tip" shall not exceed 20%.

Travelers should use courtesy transportation services (e.g., hotel shuttle buses) to and from a place of lodging when available at no cost (or at a lower cost than alternative travel) and their use does not unreasonably interfere with the traveler's schedule.

When one individual pays the taxi or ridesharing service fare for two or more travelers sharing transportation, the person who paid the full fare may claim reimbursement. The other travelers must be listed on the claimant's voucher. Use of larger vehicles (e.g., Uber XL) may be authorized to accommodate several passengers.

Ridesharing services provide several tiers of vehicle and sharing options. Use of lower cost options is encouraged. Use of luxury or premium options, including Uber Black, Uber Black SUV, Lyft Black and Lyft SUV, is prohibited unless approved by the employee's supervisor. **Limousines will not be reimbursed.**

Lodging

Hotels/Motels

The Foundation will reimburse the actual cost for average accommodations up to the single occupancy rate. IRS regulations provide that expenditures for lodging cannot be lavish or extravagant.

- Any lodging costs that occur beyond a day before or a day after the business travel represent personal costs and will not be reimbursed.
- Movies and other entertainment charged to the room will not be reimbursed.
- Health club charges, golf, mini-bar and other personal services will not be reimbursed.
- When traveling with a companion, the employee is responsible for any additional charges above single occupancy.

An original itemized hotel bill (folio) MUST support lodging reimbursement requests. For hotel rooms obtained through internet providers, the traveler must attach the entire receipt from the internet site showing total cost and confirmed services. In addition, the detailed bill for any restaurant expenses charged to the room must be submitted. The restaurant line item on the final hotel bill is not sufficient.

Alternative Lodging

When lodging other than traditional hotels and motels is used - apartments or Airbnb, for example - travelers are encouraged to thoroughly review all cancellation and prepayment policies and evaluate any additional fees. Compared to traditional hotel and motel providers, who typically allow cancellations and refunds within 24 hours of arrival, alternative lodging providers may have stricter rules. In addition, alternative lodging providers typically require the traveler to pay for the entire stay well in advance of the travel date. Travelers are discouraged from agreeing to any cancellation policy that does not provide a full refund if cancelled with one days' notice. **Charges related to cancellations, no shows or travel insurance are prohibited.**

Meals

Meals for employees while traveling for business purposes or while conducting the business of the University are permissible. Meal costs for business-related participants are also permissible. The location of the business meal does not change the reporting requirements. The same IRS rules apply to meals taken locally or out of town. The IRS states that expenditures for meals cannot be lavish or extravagant.

Detailed itemized receipts should be provided for all business and/or travel meals. The itemized receipt is required in addition to the credit card slip, if a credit card was used to pay the bill. Gratuities up to 20% are permissible.

The Foundation will reimburse the reasonable and actual cost of meals, including gratuities, while on business. The IRS requires that all requests for meal reimbursement must document the following information (regardless of cost):

1. List of attendees
2. The business purpose of the meal (topic of discussion)
3. The cost (supported by the itemized receipt)
4. The location
5. The date
6. Description of meal (e.g., lunch, dinner)

Meals with associates from other organizations do not necessarily constitute a reimbursable expense, unless the employee can establish that there was a business purpose to the meal (e.g., establishing a relationship with a prospective member, showing appreciation for a client).

Reasonable and necessary business meals involving only university employees are allowable under certain circumstances. The frequency and related expenses must be reasonable, necessary and appropriate to the purpose of the discussion and nature of the business conducted by the school/department (e.g., meetings of an organized work group of employees that require the work of the group to progress through a normal mealtime)

The Foundation will not reimburse on a per diem basis. When a meal is included in the cost of a conference, the Foundation will not reimburse the employee for the cost of a meal taken during that period (i.e., if employee chooses not to attend the provided lunch, the Foundation will not pay for an alternative lunch).

If an employee is dining with a travel companion, only the cost of the employee's meal may be charged. Shared items must be prorated.

Alcohol

Employees are expected to act responsibly in relation to alcohol consumption while on a business trip. The cost of a beverage with dinner will be reimbursed as part of the meal expense. Drinks that are not associated with a meal or drinks taken at a bar cannot be reimbursed, except with a legitimate business reason.

Snacks and Other Incidental Meals

Snacks, mini-bar, and other incidental items such as magazines, toiletries, and medicine are considered personal items and are not reimbursable.

Local (In-Town) Meals

A "business meal" is defined as a meeting that is held during mealtime where the main purpose of the meeting is business and a meal is served. In the case where employees must meet with each other during the dining hour to discuss business (e.g. brown-bag planning sessions, late night work sessions to finalize a proposal or meeting logistics), the cost of the meal may be reimbursed.

Routine lunches or get-togethers with associates are not considered business meals. Business meals must have a stated business purpose, and require the following information:

- List of attendees
- The business purpose of the meal (topic of discussion)
- The cost (supported by the itemized receipt)
- The location
- The date
- Description of meal (i.e., lunch, dinner)

Gratuities

Tips or gratuities on meals must not exceed **20%** of the total bill. This limit includes any **service charges automatically added for large parties.** Tips on meals should be included as part of the cost of the meal. Reasonable tips to bellhops, maids, etc. are reimbursable and should be totaled and reported separately. Reimbursement for tips may not exceed a customary 20% of the total charge.

Telephone

All business calls (whether from a landline or a cellular phone) made while away from the office will be reimbursed. Direct long-distance calls from the hotel room are extremely expensive and should be avoided. Employees are encouraged to use a cell phone. Employees are limited to one personal call per day for reimbursement.

Registration/Conference/Training Fees

If you must pay a registration fee directly, please provide a copy of your registration confirmation and payment receipt. If attending a conference or training as a participant, include a copy of the conference or training agenda. If attending a conference as speaker, include a copy of the speaker agreement. The Foundation will not reimburse for travel costs covered by another organization.

Travel Advances

Travel advances will be paid to faculty, staff or students for a maximum of \$500 and must be approved by the project director. If project director is the payee, the project director's supervisor must also approve the advance. Receipts supporting the travel advance must be submitted within seven days of completion of travel. If the travel expenses exceed the advance, the Foundation will reimburse the individual the difference. If the travel expenses are less than the advance, the traveler should submit a personal check payable to GMUF to reimburse the account used for the original advance disbursement.

Reimbursing Difference Between State Per-Diem and Actual Expenses

The Foundation will reimburse the difference between state per diem and actual expenses incurred. A copy of the Foundation reimbursement report detailing the final costs allowed by the state must be submitted with the employee's Foundation reimbursement request.

Prohibited Expenses

The following is a list of items that will neither be reimbursed nor paid directly by the Foundation. This list is not meant to be all-inclusive. Other items may be deemed unallowable upon review.

Air/Rail Travel

- First Class Airfare/Rail
- Business class Airfare/Rail (see pg. 2 for exceptions)
- Travel Insurance
- Excess baggage fees for personal items
- Airline Lounge Fees
- Companion expenses

Ground Transportation

- Commuting (between home and primary work location) miles/expenses
- Repairs to personal vehicles used for business travel
- Fuel purchases and/or assessments by rental car agencies
- Rental of luxury vehicles; rentals from Turo or other non-traditional sources
- Rental Car insurance for rentals within the US
- Fines for parking and/or moving violations
- Gratuities in excess of 20% on taxi, shuttle or rideshare
- Costs due to unreasonable failures to cancel rental car/rideshare reservations

Lodging

- Lodging costs that extend beyond a day before or after the business travel event.
- Personal entertainment (e.g., movies, health club, golf, mini-bar, toiletries etc.)
- Companion expenses
- Costs due to unreasonable failures to cancel hotel reservations
- Unnecessarily excessive costs (e.g., exclusive hotels or room upgrades)
- Laundry service for trips less than 5 days

Meals

- Unnecessarily excessive costs (e.g., very expensive restaurants and/or alcohol selections)
- Meals on work days when on university business-related travel
- Gratuities in excess of 20%
- Per diem meals

- Companion expenses
- Alcohol not associated with a business meal or fundraising activity
- Snacks and mini-bar items

Miscellaneous

- Lost or stolen personal property, including cash
- Charitable or political contributions
- Interest charges or fees on personal credit cards
- Expenses where the only documentation is a print-out of a credit card statement, except with written explanation of special circumstances

Non–Travel-Related Expenses

Employees’ personal credit cards shall only be used to cover travel and meal related expenses. Any non–travel-related costs, such as memberships, subscriptions, professional fees, contractual services, or event costs must not be charged on a personal credit card and shall be submitted to the Foundation so the expense can be paid via a Foundation check.

Foundation Expense Reimbursement Form and Reimbursement Policy

GMU Employees

All GMU employee reimbursements are processed via the Foundation’s internal processing system. Employees should submit for reimbursement within 30 days of the expense, or in the case of travel, within 30 days of the return date of your trip. Expenses **MUST** be submitted for reimbursement within 90 days or may not be reimbursed. Rather than delay processing, submitted expenses that are **NOT** allowed under this policy will be deducted from the total amount requested.

Supporting documentation for travel and meal related charges on the employee’s personal credit card must include a copy of the credit card statement as well as the supporting documentation as described in the policy.

Non-GMU Employees (Students, Speakers and/or Guests)

To obtain reimbursement for out-of-pocket travel expenses, complete a GMUF Non-Employee Travel Reimbursement Form. Expense reports should be completed within 30 days of the expense, or in the case of travel, within 30 days of the return date of your trip, and submitted to lawfin@foundationforscalia.org with the required supporting documentation. Expense reports must be submitted within 90 days or may not be reimbursed. Rather than delay reimbursement, submitted expenses that are not allowed under this policy will be deducted from the expense report, and those un-allowed receipts will be returned with explanation to staff. The remainder of the expense report will be processed. Returned receipts may be re-submitted with proper documentation (itemized receipt, explanation of charges, etc.).

Supporting documentation for travel and meal related charges on the requestor's personal credit card must include a copy of the credit card statement as well as the supporting documentation as described in the policy. The Non-Employee Travel Reimbursement Form must also contain the requestor's signature as well as approval from the appropriate authorized signatory and/or project director.

APPROVED by the Board of Trustees
February 25, 2026