

**GRANTS MANAGEMENT OFFICE (GMO)
FACULTY OF MEDICINE AND HEALTH SCIENCES (FMHS)
STELLENBOSCH UNIVERSITY (SU)**

**PROCEDURE AND REGULATIONS OF
TRAVEL WHEN USING UNITED STATES GOVERNMENT FUNDING**

SCOPE: This document applies to all Stellenbosch University (SU) Faculty of Medicine and Health Sciences (FMHS) researchers using United States Government (USG) Funding (Federal Funds) for travelling.

BACKGROUND AND REASON FOR THE REGULATION: Researchers throughout the SU FMHS have been successful securing grant money from the United States Government (USG) e.g. National Institutes of Health (NIH), The US President's Emergency Plan for AIDS Relief (PEPFAR), The US Global AIDS Coordinator and the US Department of Health Resources and Services Administration (HRSA). The SU FMHS is committed to provide responsible stewardship of United States Government funding. Often grant funding has been allocated for international air travel and international cargo transportation in the budget. It is required that United States air carrier service is used for all air travel and transportation services funded by the United States Government. This is commonly referred to as the "Fly America Act".

RESPONSIBILITIES

1. The GMO is responsible for developing and communicating this procedure to ensure that the FMHS research community understands the rules and regulations regulating USG funding.
2. PIs on a USG funded grant proposal are ultimately responsible for adhering to the regulations.

PROCEDURE

1. Complete **Appendix 1** when requisitioning flights using USG funding.
2. In addition to the [travelling and subsistence regulations of Stellenbosch University \(SU\)](#), please take note that when travelling using USG federal funds (NIH, USAID, PEPFAR, CDC, HRSA, etc.) the regulations of the "[Fly America Act](#)" MUST be followed.
3. Grantees must comply with the requirement that US flag air carriers must be used, when commercial air transportation is the means of travel between the South Africa and the USA or between foreign countries. This requirement shall not be influenced by factors of cost, convenience, or personal travel preference.
4. Anyone, whose air travel is financed by U.S. Government funds, must comply with the requirements of the Fly America Act ("The Act"). Exceptions to "The Act" requirements apply when traveling solely outside the US, and a US flag air carrier provided service between the origin and the destination:
 - 2.1 If a US flag air carrier offers nonstop or direct service (no aircraft change) from the origin to the destination, the US flag air carrier service must be used unless such use would extend the travel time, including delay at origin, by 24 hours or more.
 - 2.2 If a US flag air carrier does not offer nonstop or direct service (no aircraft change) between the origin and the destination, a US flag air carrier must be used on every portion of the route where it provides service unless, when compared to using a foreign air carrier, such use would:
 - Increase the number of aircraft changes by two or more; or
 - Extend the travel time by at least six hours or more; or
 - Require a connecting time of four hours or more at an interchange point.
 - 2.3 If the USG has an "open skies agreement" with a country, then you may use any airline that operates in this country e.g. KLM (Netherlands), Air France, etc. There are currently four bilateral/multilateral "Open Skies Agreements" between the US Government and
 - European Union (EU)

- Australia
- Switzerland
- Japan

List of open skies partners: <https://www.transportation.gov/policy/aviation-policy/open-skies-agreements-being-applied>

5. Compare SU *per diem* and hotel rates with that of USG. Please follow the link to check USG rates: [Federal Travel Regulation Per Diem Rates by Location](#)
6. With reference to the [NIH Grants Policy Statement](#) (Revised December 2019) **Visa Costs** is an allowable direct cost as part of recruiting costs on an NIH grant, as long as the institution has an employee/employer relationship with the individual. ([NIH Allowable Cost](#)). Short-term, travel visa costs (as opposed to longer-term, immigration visas) are generally allowable expenses that may be proposed as a direct cost. Since short-term visas are issued for a specific period and purpose, they can be clearly identified as directly connected to work performed on a Federal award. VISA Cost is allowable for CDC Funding. For these costs to be directly charged to a Federal award, they must:
 - a. Be critical and necessary for the conduct of the project;
 - b. Be allowable under the applicable cost principles;
 - c. Be consistent with the non-Federal entity's cost accounting practices and non-Federal entity policy; and
 - d. Meet the definition of "direct cost" as described in the applicable cost principles.
7. It is the responsibility of the institution to monitor the status of the individual's work permit visa and ensure they have sufficient time to fulfil the obligations of the research they are being paid for on the grant. However, if the person is already an employee, and the cost in question is a work permit visa renewal then this isn't a recruiting cost so the cost would not be an allowable charge to a grant. It is not applicable to CDC funding grants
8. Use the checklist (**Appendix 1**) to determine when the "Fly America Act" applies.
9. Retain all support documentation for audit purposes.
10. Consult your project accountant for any assistance or review of the support documents to ensure you comply with "The Act".

ACRONYMS AND DEFINITIONS

PIs	Principal Investigator(s) is the primary individual responsible for the preparation, conduct, and administration of a research grant, cooperative agreement, training or public service project, contract, or other sponsored project in compliance with applicable laws and regulations and institutional policy governing the conduct of sponsored research.
USG	United States Government
U.S. flag air carrier service	Service provided on an air carrier that holds a certificate under 49 U.S.C. 41102, and is authorized either by the carrier's certificate, or by exemption or regulation. US flag air carrier service also includes service provided under a code share agreement with a foreign air carrier in accordance with Title 14, Code of Federal Regulations when the ticket, or documentation for an electronic ticket, identifies the US flag air carrier's designator code and flight number.
Non-U.S. flag carrier	not affiliated/non coach share flight with an American airline
NIH	National Institutes of Health
PEPFAR	The U.S. President's Emergency Plan for AIDS Relief
HRSA	US Department of Health Resources and Services Administration
Open skies agreement	Non-US flag carrier/airline that has an agreement with the US and can therefore be used for foreign travel (please see link provided for which airlines has this "open skies agreement" with the US.
Foreign travel	International travel means travel outside South Africa

Appendix 1

Checklist to determine when the “Fly America Act” does apply

Requisition Number

can only be added after
checklist has been completed &
correct flights has been selected

Project Name & Number: _____

Date of Travel/Conference/Meeting: _____

Description of Travel/Conference/Meeting: _____

Has the PI allocated money for travel in the budget?

- Yes
- No - please consult your project accountant at GMO before making travel arrangements.

Is this international travel?

- Yes
- No - If domestic then please comply with SU travel policy only.

Is the funding source from United States Government?

- Yes
- No - then you do not have to comply with the Fly America Act.

Is there an open skies agreement with the preferred airline?

- Yes, please retain support documents for audit purposes.
- No, please use U.S. flag carrier (unless one of the other exceptions apply?).

Do any of the other exceptions apply?

- Yes, please retain support documents for audit purposes
- No - please use U.S. flag air carrier

If exceptions apply, please tick the box for applicable exception

- Increase the number of aircraft changes by two (2) or more
- Extend the travel time by at least six (6) hours or more; or
- Require a connecting time of four (4) hours or more at an interchange point.

Prepared by (PI/Admin):

Approved by (GMO):

Name:		Name:	
Date:		Date:	
Signature:		Signature:	