



**STATE OF SOUTH CAROLINA  
DEPARTMENT OF EDUCATION**

**MOLLY M. SPEARMAN**  
*STATE SUPERINTENDENT OF EDUCATION*

**MEMORANDUM**

**TO:** Federal Program Directors  
School Business Officials

**FROM:** Melissa Myers, Director, Office of Auditing Services *M.M.*  
Roy Stehle, Director, Office of Federal and State Accountability *RMS*  
Nancy Williams, Chief Finance Officer *NW*

**DATE:** June 12, 2017

**RE:** **Reimbursement of Airfare and Registration Fees with Federal Funds**

The purpose of this memorandum is to provide guidance to subgrant recipients from both federal and state sources on the use of federal funds for airfare and registrations fees, especially in cases when the obligations are incurred in one fiscal year and the actual travel occurs in a subsequent fiscal year.

The United States Department of Education provided guidance in the form of Frequently Asked Questions in December 2014 for using federal funds for conferences and meetings. One of the questions and the corresponding response state the following:

**What travel expenses may be paid for with Federal grant funds?**

Grantees may use Federal grant funds for travel expenses only to the extent such costs are reasonable and necessary and do not exceed charges normally allowed by the grantee in its regular operations consistent with its written travel policies. In the absence of an acceptable written policy regarding travel costs, grantees must follow the Federal travel and subsistence rates established by the General Services Administration. 48 CFR 31.205-46(a) (established under subchapter I of Chapter 57, Title 5, United States Code ("Travel and Subsistence Expenses; Mileage Allowances")). Federal grant funds may be used to pay expenses for transportation, per diem, and lodging if the costs are reasonable and necessary. Grantees

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should follow their own travel and per diem rules and costs when charging travel expenses to their Federal grant. As noted in the cost principles, grantees that do not have travel policies must follow:

...the rates and amounts established under subchapter I of Chapter 57, Title 5, United States Code ("Travel and Subsistence Expenses; Mileage Allowances"), or by the Administrator of General Services, or by the President (or his or her designee) pursuant to any provisions of such subchapter shall apply to travel under sponsored agreements (48 CFR 31.205-46(a)).

*See 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*

Section 11-3-121 of the Code of Laws of South Carolina states "The Comptroller General is authorized to honor vouchers in the current fiscal year for advance payment of airfares and registration fees for official travel to meetings and conferences in July and August of the next fiscal year if the advance payment results in savings and funds are available in the requesting agency's current budget".

Therefore, subgrantees may seek reimbursement of expenditures from federal grants for airfare and registration fees paid for in the fiscal year that the airfare and registration fees were paid, even though the travel is in July or August of the next fiscal year. The grantee must demonstrate the advance payment results in a cost savings. However, if the travel is not taken, the subgrantee must reimburse the SCDE for the funds reimbursed in advance of the trip.

If you have any questions, contact Melissa Myers at 803-734-8453, [mmyers@ed.sc.gov](mailto:mmyers@ed.sc.gov), Jewell Stanley at 803-734-8131, [jstanley@ed.sc.gov](mailto:jstanley@ed.sc.gov); or Nancy Williams at 803-734-8180, [nwilliams@ed.sc.gov](mailto:nwilliams@ed.sc.gov).

cc: Audrey Shifflett, Grants Manager