

## TRAVEL POLICY

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## Policy Statement

This document establishes the policies that apply to all travel-related expenses to be reimbursed by Kepler Research, Inc. (Kepler) whether a direct (expense that will be passed to a client) or indirect (Kepler paid) expense.

This policy applies to all Kepler employees and consultants.

The guidance in this policy incorporates directly, or by reference, Federal Joint Travel Regulations (JTR) covering contractor travel as well as terms listed in the contracts Kepler has with the Federal Government.

Kepler will reimburse travelers only for expenses that are reasonable and necessary to conduct business for Kepler or a client. Kepler expects its travelers to exercise the same care and regard for expenses as a prudent person traveling at personal expense.

**Each traveler has responsibility for understanding and abiding by the policies stated herein.**

**Claims for reimbursement for expenses that are not authorized or are prohibited by this policy will not be reimbursed.** Any questions about this policy should be directed to the traveler's supervisor, an Office Manager, or Vice President (VP) of Business Operations. Any exception to this policy will require full written justification by the Traveler and approval by the President of Kepler before the travel occurs and may also require approval by the Government's Contracting Officer (CO) or the Contracting Officer Representative (COR).

## Responsibilities

Each traveler and their Kepler supervisor are responsibility for understanding and abiding by the policies stated herein.

The traveler's Kepler supervisor is responsible for approving all travel before it happens. The Kepler supervisor must ensure any additional client requirements, as stated in the contract, are followed. (Example: some contracts require government COR approval for travel).

Traveler and their Kepler supervisor should ensure travel is performed only when absolutely necessary and allowed under the terms of the contract. If travel is for Kepler business, then coordination should be done with the traveler's supervisor and either the VP of Business Operations or Kepler's President.

If the traveler's Kepler supervisor responsibility to unsure travel funds are available on a contract and should also coordinate with Kepler's VP of Contracts. Note - not all contracts had travel funds and may require a modification to the contract before travel can take place.

Traveler and their Kepler supervisor should ensure travel is performed at the most expeditious and cost-effective means of transportation practicable. Reimbursement of costs will be based on JTR rates.

Traveler should notify their Office Manager of their travel plans.

Traveler will notify their Kepler supervisor and Office Manager of any travel changes.

Traveler will promptly submit a Travel Voucher, with receipts, to their Kepler supervisor for review and approval upon completion of travel. **If copies of receipts are provided, the traveler will maintain the originals for 3 years and make them available if asked by an auditor.** It is recommended the traveler provide Kepler with the originals.

## Travel Forms

The following forms are applicable to or required by this policy and can be requested from your Office Manager or found on Kepler's SharePoint account:

- Travel Authorization – for travel approval (client form or an email from the client can be used in place of this form)
- Traveler Profile (optional) – if Traveler would like an Office Manager to assist with making reservations
- Travel Expense Voucher – used for reimbursement of travel expenses for travel longer than a day
- Petty Cash/Mileage/Expense Reimbursement – used for reimbursement of local travel expenses

## Travel Authorization

Kepler's employees shall ensure all travel on behalf of a client or Kepler is necessary and allowable under the terms of their contract. Not all contracts have travel funds and may require a modification to the contract before travel can be conducted.

**The traveler must obtain approval from their Kepler supervisor and client prior to travel.**

The Kepler supervisor should coordinate with Kepler's VP of Contracts to ensure availability of travel funds or specific contract requirements. **For travel conducted under a government contract, prior approval from the Contracting Officer Representative is required and the employee must include the approval form (may be an email) as well as the Kepler Travel Authorization Form (if necessary) for the final submission of the travel expense voucher package.**

The VP of Business Operations or President of Kepler approve (verbal or in writing) all travel that is indirect/Kepler related. For indirect/Kepler travel a Travel Authorization form is requested when possible for all personnel, except for travel conducted by the President of Kepler.

## Travel Administration

Travel must be by the most expeditious and cost-effective means of transportation practicable and commensurate with the nature and purpose of the employee's duties. Travel by commercial airplane or car are most often used but only the cheapest mode of travel will be reimbursed. Travel by personal/private plane is not allowed.

A Traveler must use **economy/coach-class** for all official funded travel, unless other than economy/coach class accommodations are authorized due to special circumstances.

**If the Traveler does not gain approval for travel that is not the most cost advantageous any additional expenses incurred will be borne by the traveler.**

*Example: It is determined that the most cost advantageous and expeditious form of transportation for a Kepler traveler is by commercial airline. The individual decides to drive instead. Reimbursement for transportation will be at the commercial airline cost since it is cheaper.*

Travelers should document what an airline ticket would cost compared to driving so they can be reimbursed the appropriate amount.

Travelers should let their Office Manager or VP of Business Operations know of all travel. This can be done by providing a copy of their approved Travel Request form (when one is required) or by

sending an email. This will let the Office Manager know that travel costs will need to be invoiced to the client on the next invoice or in case an emergency takes place and the traveler's location is needed. Updates can be passed by phone or email.

Travelers can make their own travel plans or ask their local Office Manager to assist them with researching travel requirements, finding economical reservations, and making reservations. If a traveler would like their local Office Manager to assist, then they should complete the Traveler Profile Form. A complete, accurate profile provides the Office Manager with essential information, including the traveler's home, office, and fax numbers; frequent flyer data; and hotel and rental car preferences. Reservations can be made directly with established businesses or through the internet.

The traveler will complete a Travel Expense Voucher, with receipts, promptly upon their return. The Travel Expense Voucher package will be submitted to the traveler's Kepler supervisor for review and approval. Once approved by the supervisor the Travel Expense Voucher package will be sent to their Office Manager for review. Once the Office Manager agrees that the Travel Expense Voucher is accurate and complete then it will be forwarded to the VP of Business Operations for payment. The traveler can ask their local Office Manager for a quick review prior to submitting to their supervisor for approval.

**All expenses (no matter the amount) on the Travel Expense Voucher should have a receipt if possible.** If a receipt is missing, then the traveler needs to annotate this by entering a comment in the Comments Section of the Travel Voucher. This way it is clear that all expenses are current and not left over from a previous voucher. **If copies of receipts are used then the Traveler needs to keep the original receipts for 3 years and provide if requested by an auditor.** It is recommended the Traveler give Kepler the original receipts.

## Credit Cards for Travel

Travelers may use their own credit cards for business expense use; however, if the employee prefers, the company will request an American Express credit card for the employee (**to be strictly used for business expenses**) and will pay the annual fee for the traveler. American Express may decline the request for a card or could limit the credit amount. Cash advances cannot be made with this American Express card.

When using an American Express card, received through Kepler, the traveler will be required to **pay off the balance each month.**

**Kepler sponsored American Express cards may not be used for personal purchases or by anyone other than the approved cardholder.** By signing the back of the American Express card, cardholders concur with the terms and conditions of the American Express cardholder agreement enclosed with the card. Unauthorized use of the travel card may result in disciplinary or adverse personnel action.

American Express may limit the amount that can be charged to any American Express card and may suspend the travel cardholder's charge privileges if payment is delinquent more than 60 days. If payment is delinquent more than 120 days, American Express may cancel the travel card, initiate wage-garnishment proceedings through the judicial system, and notify credit bureaus of the delinquency.

The VP of Business Operations will also review reports from American Express on the cards use and any delinquencies.

## Air Travel

Travelers should always use the lowest priced airfare available.

All air travel should be in **economy/coach class**, unless the traveler bears the cost of the difference between economy/coach and first/business class if not previously approved by the President of Kepler and meeting one of the requirements:

- No coach class is reasonably available. "Reasonably available" means available on an airline that is scheduled to leave within 24 hours of the proposed departure time, or scheduled to arrive within 24 hours of the proposed arrival time.
- No space is available in economy/coach class accommodations in time to accomplish a mission that is urgent and cannot be postponed.
- Medical reasons that have been substantiated by a competent medical authority.
- The use results in an overall cost savings by avoiding additional per diem costs while awaiting coach class accommodations.
- Origin and/or destination is outside the continental United States, travel is direct between authorized original and destination points separated by several time zones, and the scheduled flight time (including stopovers) is in excess of 14 hours. In this instance, the traveler is not eligible for a rest stop en route or rest period upon arrival at the duty site.

If other than economy/coach class ticket is booked and the traveler requires a change which is approved by Kepler, a reasonable exchange fee may be claimed.

## U.S. Flag Carriers

Kepler travelers must fly on U.S. flag airlines even if a foreign flag carrier can provide comparable or different service at lower cost and even if foreign flag carrier service is more convenient. In accordance with the Fly America Act (49 USC 1517) and the Federal Acquisition Regulations (FAR), Part 47.402, U.S. flag carriers must be used for international air travel, including the transportation of personal effects and property, if the cost of such travel is reimbursable by the U.S. Federal Government as a direct charge to a contract or as an indirect charge (for example, new business, training and development, or overhead). This requirement is subject to limited statutory exceptions if a U.S. flag carrier is not available.

## Baggage

Travelers should check with the airline they are using for baggage rules and fees. The traveler will be reimbursed for one checked bag for trips lasting 5 or less business days. The fee for 2 checked bags will be reimbursed for trips over 5 business days.

## Non-Refundable Tickets

In the case of a non-refundable ticket not being used, contact the airline immediately to cancel the reservation. Non-refundable tickets can be used only by the same traveler for another trip at a later date. It is the responsibility of the traveler to notify their Supervisor and Office Manager that a "not used" non-refundable ticket is available and should be considered for future travel. Any fees associated with the purchase of the original non-refundable ticket or purchase of any subsequent ticket by the traveler, are reimbursable travel expenses. The traveler will also be reimbursed for the "not used" ticket immediately but the client will not be charged until the ticket is actually used.

## Charter Aircraft

Use of charter aircraft on Kepler business is permissible only in emergency situations and must be approved in advance by the President of Kepler Research.

## Privately Owned, Rented, or Leased Aircraft

Privately owned or rental aircraft will not be used for Kepler business under any circumstances.

## Rail Travel

All rail travel should be in coach class only, unless the traveler bears the cost of the difference between coach and any other class. Travel must be approved in advance by the traveler's Supervisor.

If a restricted fare is booked and the traveler requires a change which is approved by Kepler, a reasonable exchange fee may be claimed.

## Combined Business and Personal Travel

The traveler may combine personal (leave) and business travel, during domestic travel only, as long as no additional costs are passed to the Kepler or the client. The traveler must pay for all costs incurred during their personal time.

The traveler may stay over an additional night (one), at no additional cost to them, if there is a **cost savings to the client of at least \$100**. The cost savings must be documented on the Travel Expense Voucher. The additional night must be at the **same location** as the official client related travel. If the employee chooses to stay over an additional night and leaves the area, all charges associated with the extra stay, no matter the savings to the client, will be paid for by the traveler. The only exception to not staying in the same location is if the traveler moves closer to the airport they will be departing from or if the traveler has permission to drive instead of flying. Traveler may stay an additional night if their flight is delayed due to bad weather.

Any rental vehicle expense is at the personal expense of the traveler.

Time cannot be charged to the client if staying over the extra day.

The reimbursement of the cost of travel for spouses, other family members, and friends is not allowable under any circumstances.

Kepler will not permit a trip that is an excuse for personal travel.

## Authorized Trips Home During Extended Business Travel

If a Kepler traveler is going to be on travel for an extended period (longer than 2 weeks) of time and wishes to travel home during weekends or down time they should first request permission and cost coverage from their client. If the client will not authorize the funds for the return trip(s) home the traveler may request cost coverage from Kepler's President. The traveler will still have to gain permission from the client for travel home even if Kepler is paying the cost.

## Returning Home Early

Occasionally, it may be necessary to return home earlier than expected during official business travel. All requests to return home early must be justified if the fees are going to be charged to

either the client or Kepler. Returning home on a flight earlier than planned for personal convenience is **not** a justified reason and reimbursement for the flight change will not be allowable; however, flying "standby" at no additional cost is permitted. Any questions regarding an early return should be directed to your Supervisor or the VP of Business Operations.

## Emergency Travel During a Business Trip

If it becomes necessary to interrupt a business trip for valid reasons, the traveler should contact their Supervisor or VP of Business Operations to obtain approval for additional costs associated with changing travel plans.

## Per Diem

Reimbursement for hotel and food expenses are calculated using the federally established per diem rates under the lodging-plus system (lodging plus meals and incidental expenses (M&IE)). Per Diem rates apply to trips over 12 hours in length and at least 75 miles in distance from both their office and residence. If the traveler has received prior to travel permission to be reimbursed for actual expenses then the per diem rates will not apply.

**The location of where the work is being performed determines the per diem reimbursement rate not the location of the hotel.**

Per diem rates are available on the Internet at: <http://www.defensetravel.dod.mil/site/perdiem.cfm>

The traveler will be reimbursed 75% of a day's Per Diem for M&IE on the day they depart and 75% on the day they return.

When meals are provided as part of the meeting, conference, seminar, or training, the traveler is expected to take advantage of this opportunity. Daily meal per diem will be reduced accordingly. Current guidance in the Government's Joint Travel Regulations (JTR) will be used for determining the reduction amount. Travelers will not be reimbursed for alternate meals when opting not to utilize meals provided by the organizing entity.

The daily M&IE rate is to cover the cost of food along with a modest allowances for incidentals (such as tips), receipts for meals and incidental expenses covered by per diem are not required.

When on travel for over a week the traveler will be reimbursed for laundry and dry cleaning.

## Per Diem Computations Internationally

In computing per diem when the traveler crosses the international dateline, the actual elapsed time rather than calendar days is used to compute per diem.

A rest stop of 24 hours or less may be authorized at an intermediate point or destination if (a) the origin or destination point is outside the continental United States, (b) travel is by a direct or usually traveled route, (c) travel is by less than first-class or premium-class accommodations, *and* (d) the scheduled flight time, including stopovers, exceeds 14 hours. When a rest stop is authorized, the applicable per diem rate is the rate for the rest stop location.

The maximum per diem rate is determined by the location of the traveler's TDY location or at a stopover point where lodging is obtained while en route to, from, or between TDY locations. Only one maximum rate will be applicable to a calendar day or fraction thereof.



Kepler reimburses the traveler  $\frac{3}{4}$  of a day's per diem on the first day of departure and the return day based on the TDY location regardless of travel time

## Actual Expense Allowance

The per diem rates are generally adequate; however, the allowable rate may be insufficient for a particular trip due to special or unusual circumstances. Actual Expense Authorization may be warranted for individual travel situations if the actual and necessary expenses exceed the maximum per diem allowance. Written approval must be given for individual travel assignments only after consideration of the facts existing at the time travel is approved. Situations that may warrant Actual Expense Allowance include:

- Lodging and/or meals are procured at a prearranged place such as a hotel where a meeting, conference, or training session is held.
- Costs have escalated because of special events (for example, conventions, sports events, or natural disasters); lodging and meal expenses within prescribed allowances cannot be obtained nearby, and costs to commute to/from the nearby location consume most or all of the savings achieved by occupying less expensive lodging.
- The traveler, because of special duties of the assignment, necessarily incurs unusually high expenses in conducting official Kepler business because of special requirements of the assignment, such as procuring a suite or other quarters.
- Meals and Incidental Expenses (M&IE) may be reimbursed under the lodgings-plus per diem system, while the lodging cost is reimbursed on an actual expense basis. Reimbursement on an actual expense basis may not exceed 200 percent of the maximum per diem allowance.

All Actual Expense Authorizations must be authorized by the supervisor before travel begins and must be stated on the Travel Authorization form or separate memo.

## Hotels & Lodging

Travelers will be reimbursed for lodging at the lesser of actual costs incurred or the federally established lodging ceiling for the particular city where the work is being performed. (example - hotel basic room rate is \$75 a day and the federally established ceiling is \$80, you will only receive reimbursement of \$75). Traveler may request reimbursement of actual amount if justification can be provided and should be done prior to travel.

Allowable lodging rates are based on single-occupancy room rate (minus applicable taxes, which are reimbursed as miscellaneous travel expenses and are not subject to the maximum per diem cap). When travelers choose to share a room, one half of the double-occupancy rate is allowed for each traveler. Itemized receipts are requested to support all lodging costs.

If it becomes necessary to change or cancel hotel reservation while already on travel, it is the traveler's responsibility to ensure that guaranteed reservations are canceled in time to avoid cancellation penalties. The traveler must document any changes or cancellations (record the date, time, cancellation number, and clerk's name) to avoid being charged no-show penalties.

If a traveler obtains free lodging (example - staying with a relative or friend), no part of the per diem amount will be allowed.

## Local Mileage

Mileage, for travel in the local area, will be reimbursed for the distance between the employee's daily work location and the location of the business function being attended. Mileage will not be reimbursed for use of a POV between the employee's work location and home. Mileage is based on the standard miles of the "shortest route" as indicated by commercially available websites providing driving directions. The current reimbursement rate can be found at:

<http://www.defensetravel.dod.mil/site/otherratesMile.cfm>

Weekend travel is occasionally required in order for the employee to be in attendance at a meeting, training class, conference, or seminar on time. When an employee departs from their residence on a weekend, the employee will be reimbursed mileage based on the full distance from their residence to the location.

In the event that an employee departs from their residence on a normal workday for official business travel or returns directly to their residence on a normal workday following official business travel, only the miles in excess of their normal daily commute can be claimed as an expense. Please note that if an employee departs from their residence on a workday evening for official business travel and the individual has already traveled to work and back home for that business day, full mileage will be reimbursed from their residence to the travel location.

**Example 1:** *An individual's normal daily commute is from Alexandria, VA to Arlington, VA, approximately 8 miles. On a normal workday, the individual returns from official business travel to Reagan Airport and drives to their residence in Alexandria, VA which is a 4-mile drive. The individual may not claim mileage reimbursement because the distance from Reagan Airport to his home in Alexandria, VA is less than his normal daily commute to work.*

**Example 2:** *An individual's normal daily commute is from Fredericksburg, VA to Woodbridge, VA, approximately 30 miles. On a normal workday, the individual departs on official business travel from their residence in Fredericksburg for a seminar in Rosslyn, VA which is 50 miles from their home. The individual may claim mileage reimbursement for 20 miles, which is the difference between their normal daily commute and the commute to the seminar.*

## Using Privately Owned Vehicles (POV) Instead of Other Cheaper Travel Mode

The traveler will be reimbursed for the lowest cost of transportation to the business location. Use of a POV for official business will be reimbursed at the most current rate according to DoD Travel Regulations. Prior to travel the traveler needs to calculate the cost of taking their POV to the business location and compare it to the cost of taking a plane or using a rental car. Documentation should be provided when getting approval for the travel (PRIOR to the trip) and submitted with the final Travel Expense Voucher.

The mileage allowance covers all automobile costs, including insurance, depreciation, gasoline, oil, repairs, and maintenance.

A traveler's personal auto insurance is the primary coverage in case of accident. Kepler Research cannot obtain insurance coverage for use of vehicles not owned or leased by Kepler. POVs other than those owned by the traveler should not be used to conduct Kepler Research business.

Travelers should use the Petty Cash/Mileage/Expense Reimbursement form for reimbursement of local area travel and expenses.

Separate policies govern reimbursements for relocation and house-hunting trips.

## Taxicabs and Airport Limousines

Travelers are authorized to use a taxi from departure point to or from the airport and to or from the hotel when taxis are more cost-effective than other available means of transportation.

Reimbursement for small tips to taxi drivers may be allowed. A traveler who uses hotel shuttles or similar transportation without charge, between lodging and departure terminal, may be reimbursed for shuttle driver tips (small). Reimbursement for taxicab fares will be made **only if** an appropriate receipt is submitted with the Travel Voucher or a statement is made on the Travel Voucher that the receipt was lost or not received.

The use of taxicabs is permitted while on official travel if:

If a taxi is used to or from restaurants for meals, the taxi fee is considered part of the per diem meals and incidental expenses (M&IE) allowance. If meals cannot be obtained at the work location or place of lodging and the traveler is not authorized a rental car, a taxi may be approved as an incidental cost in addition to the M&IE allowance. A statement justifying such a daily travel cost must accompany the Travel Expense Voucher and.

## Rental Cars

Authorization for the **less expensive** automobile rentals is to be requested in the original Travel Authorization form.

Before accepting a rental automobile, any preexisting damage (including "nicks or dings") should be noted and documented before signing the contract so that the contractor traveler is not charged for damages unrelated to the rental.

At the time the rental car is picked up, the contractor traveler must be able to produce a major credit card. The rental car company may refuse the rental in the absence of a credit card.

Auto rental companies typically require that renters be at least 21 years of age; in some instances the minimum age for automobile rental is 25 years of age. If there is a question, please call your rental company.

Kepler Research will reimburse travelers for the cost of a rental car when public transportation is not convenient or readily available or when use of a rental car is more cost-effective than the alternatives. Rental cars should not be requested if the only ground transportation required is between the airport and lodging and/or meeting place and a shuttle service is available, or when taking a taxi to the hotel and/or place of business would be **less expensive**. Whenever possible, cars should be reserved by you or your travel POC in advance.

Travelers are required to rent the least expensive vehicle necessary to transact business—generally a compact car. Use of a larger vehicle may be justified when more than one employee is expected to use it, when an employee must travel with special equipment or luggage necessary to meet business requirements, or when a compact car is not reasonably adequate for the traveler's physical comfort or medical needs.

**Travelers in the United States may purchase the agency-offered collision or personal accident insurance and Kepler will reimburse them.** But the traveler is strongly encouraged to rent the vehicle with a credit card offering coverage. The American Express card, with Car Rental Loss and Damage Insurance Plan, automatically provides coverage for theft of or damage to the rental vehicle – please make sure this is still available from American Express. Kepler will reimburse the

traveler for their annual American Express membership fee if the employee chooses to use a Kepler American Express card.

**If the traveler does not use a credit card with rental car coverage nor purchases additional coverage, then their individual insurance is the primary insurance that will respond in the event of a claim for damages to other people or to the rental car.** If the rental agreement is in Kepler's name, then the hired/non-owned liability insurance that Kepler maintains will respond to a claim for damages to other people.

Travelers renting vehicles overseas must take all forms of insurance coverage offered, and the costs will be reimbursed.

Reimbursement for personal funds for damage sustained by a rented automobile while being used on other than official business is not authorized.

Please discuss/review the additional rental car insurance options with the rental car company.

Travelers are responsible for reviewing the rental agency charge slip prior to accepting and signing the charges to ensure there are no over-charges.

Travelers should not drop off rental cars at a location other than the one where it was picked up unless advance arrangements have been made and approved.

## Miscellaneous Expenses

The Traveler will be reimbursed for the following miscellaneous expenses listed below. Receipts should be proved with the Travel Voucher package if applicable.

- **Baggage fees.** Travelers will be reimbursed for baggage handling fees and/or excess baggage fees incurred to transport Kepler Research equipment, **other than** the traveler's personal baggage and computer, necessary for conducting business on the trip. The Traveler will be reimbursed for one bag per week of travel.
- **Currency conversion.** Traveler will be reimbursed for the cost of converting dollars and foreign currency.
- **Dry cleaning and laundry.** Laundry and dry cleaning expenses are reimbursable as a miscellaneous travel expense. However, to qualify for this reimbursement, the travel must be longer than 5 days and the traveler.
- **Parking.** Travelers may be reimbursed for parking a personal vehicle at the airport for the duration of their travel. However, the most economical means for parking must be utilized. Garage or valet parking will NOT be reimbursed, unless a special need justifies this sort of parking.
- Travelers may be reimbursed for parking a personal vehicle or rental car at the hotel for the duration of their stay or at meeting locations. The most economical means for parking should be utilized. Garage or valet parking will NOT be reimbursed, unless this is the only option or a special need justifies this sort of parking.
- **Tolls.** Tolls incurred while traveling via personal vehicle or rental car are a reimbursable expense.
- **Gasoline.** For rental cars, travelers will be reimbursed for the cost of gasoline. For POVs, gasoline will not be reimbursed because it is included in the mileage reimbursement rate for POVs.
- **Cash Advance.** Kepler Research can, if requested, pre-pay the Traveler for estimated costs of the trip. Requests should be made by the traveler through the Petty Cash system and will be deducted from the final Travel Voucher. If for any reason the cash advance is more than the

total of the actual costs of the trip then the Traveler will reimburse Kepler for the overpayment at the time the Travel Voucher is submitted.

- **Telephone/Cell and Fax Charges.** Reimbursement will be received for phone and/or fax charges that were incurred for official business.
- **Visas, Passports, and Required Immunizations.** Obtaining visas, passports, and required immunizations for overseas travel are the responsibility of the individual traveler. Costs of obtaining or renewing passports, visas, or immunizations necessary to travel for Kepler Research business will be reimbursed.

## Non-Reimbursable Expenses

The Traveler will NOT be reimbursed for the types of expenses listed below. This list is intended to provide general guidance and is not comprehensive. For questions concerning particular expenses not listed below, please consult your Office Manager or the Director of Business Operations.

- Parking tickets and traffic tickets
- Hotel cancellation fees without justification
- Lodging rates in excess of Federal limits not covered by policy exceptions
- All additional flight, baggage, travel accident, or supplementary life insurance
- Expenses of a strictly personal nature
- Penalties and fines
- In-room movies
- Cost of lost or damaged luggage, clothing, or other personal items
- Additional costs associated with an accompanying travel companion
- Alcohol
- Entertainment (expenditures on entertainment of public officials is heavily restricted by conflict-of-interest regulations and should be avoided)

## Receipts

Except for per diem (food) expenses, receipts are required for all expenditures ***regardless of cost***. If a receipt is not normally provided for the expense (metro, bus token, etc.), the traveler should state on the Travel Voucher form that obtaining a receipt was not possible or is missing. If a receipt is lost, the traveler needs to state this on their Travel Voucher with the amount. The traveler should give all original receipts to Kepler as part of their Travel Voucher package. If the traveler decides to keep the original receipts and give Kepler copies then the **Traveler will maintain the original receipts for 3 years and make them available if asked by an auditor or a Kepler VP or Office Manger.**

Receipts must be provided for all expenses when traveling under Actual Expense Allowance, including detailed statements and proof of payment for hotels and rental car agencies, the travel itinerary for air and rail travel, signed receipts with the company name for taxi and limousine service, and meal receipts.

## Travel Voucher Completion

After completion of travel, a Travel Voucher must be submitted for reimbursement to the traveler's supervisor as soon as possible. After reviewing, the supervisor will forward the Travel Voucher package to their Office Manager for additional review and then to the VP of Business Operations for payment.

## Penalties

The penalty for invoicing a travel voucher that falsifies any item in the claim is forfeiture of the claim (28 U.S.C. 2514). Further, travelers who falsify a claim may be fined or imprisoned for not more than 5 years, or both (18 U.S.C. Section 1001), and a corporation may be fined up to maximum of \$500,000 (18 U.S.C. Section 3571 (c)).

## Insurance and Accidents or Claims While on Travel

Traveler's individual insurance is the primary insurance that will respond in the event of a claim for damages to other people or to the rental car. If the rental agreement is in Kepler's name, then the hired/non owned liability insurance that Kepler maintains will respond to a claim for damages to other people.

**Travelers may purchase additional insurance coverage from the rental car agency and will be reimbursed by Kepler.** Travelers should also check and see if the credit card used to reserve the vehicle (whether the individual's card or Kepler's sponsored American Express card) includes any coverage.

In case of an accident involving a rental car, the traveler should:

- Notify local authorities as necessary,
- Inform the rental car supplier,
- Notify your Kepler Supervisor

Kepler cannot assume responsibility for loss or damage to the personal property of Traveler or others who are traveling on Kepler business.

## Gifts, Gratuities, and Other Benefits Received from Commercial Sources

Travelers are not obligated to account for gifts, gratuities, or other benefits received from airlines, hotels, and rental car agencies. An employee who participates in a promotional program that accrues personal benefits such as free seat upgrades, membership in clubs, travel bonuses, or non-transferable coupons may retain such benefits for personal use.

Travelers may keep payments received from a carrier for *voluntarily* vacating a seat on an overbooked flight and taking a later flight. However, no additional per diem or travel expenses (above what would normally have been paid) will be paid as a result of the delayed return. In contrast, if an employee is denied boarding on an overbooked flight and is compensated with payment or airline tickets for future travel, Kepler Research will reimburse additional per diem and travel expenses, but the employee *must* relinquish such payment to Kepler Research.

## Interviewees and New Hire Relocations

Travel to Kepler by prospective employees and relocation reimbursements for current or new employees must be approved by President of Kepler Research or a designee. Relocation reimbursements are governed by separate Kepler policy and IRS regulations.

## Clearances

Staff holding any clearance must coordinate all proposed **foreign travel**, business or personal, with Kepler Research's Facility Security Office (FSO) at **least 2 weeks prior to commencing travel**. They

also must coordinate with their client site Security POC to see if there are any special requirements on the Government side.

Upon completion of foreign travel, the FSO must be notified.

### Customs Regulations

For current regulations on items that may be taken into and out of a foreign country, check with the U.S. Customs Office at the departure airport in the United States or check the State Department Travel Advisories website at <http://travel.state.gov> (Consular Affairs Bulletin Board) / <http://www.state.gov> (Main State Department)

### Exceptions to Travel Policy

Requests for exceptions to the requirements in this Travel Policy should be submitted in writing to Kepler's President or VP of Business Operations.

EMPLOYEE NAME

DIVISION

TODAY'S DATE

CHARGE CODE(S)

DIRECT

ITINERARY

FROM:

TO:

DATE:

TIME:

RATE BASED ON:

TRAVEL PURPOSE:

MILEAGE →

\$

PER DIEM

LODGING LIMIT

DAY 1 DAY 2 DAY 3 DAY 4 DAY 5 DAY 6 DAY 7 DAY 8 DAY 9 DAY 10 DAY 11 DAY 12 DAY 13 DAY 14

KEPLER EMPLOYEE TOTAL

COMPANY:

EMPLOYEE:

Air Fare:

Per Diem:

Hotel:

Hotel Taxes:

Car Rental:

Car Rental Fuel:

Taxi/Metro/Shuttle:

Phone:

Mileage:

Airport Parking:

Other:

TOTALS

SUBTRACT

\*Travel Advance

Kepler Paid Expenses

Client Charged Expenses

**NET Amount Due to Employee**

EXPLANATION OF OTHER EXPENSES AND ADDITIONAL COMMENTS

Code		
Code		
Code		
Code		
Code		

I hereby certify that I incurred the expenses claimed on this Travel Voucher in the conduct of official Kepler business and in accordance with the approved Travel Order and Kepler's Travel Policies. Form must be accompanied by ORIGINAL documents (charge slips and/or receipts for airfare, lodging, car rental, taxi, meals, and other expenses in excess of \$75.00).

FOR ACCOUNTING USE ONLY

Advance Requested?  YES Amount: \$ \_\_\_\_\_

Advance Date: \_\_\_\_\_ Check #: \_\_\_\_\_

Voucher & Receipts Sent?  YES Date: \_\_\_\_\_

Reviewed By: \_\_\_\_\_ Date: \_\_\_\_\_

TRAVELER SIGNATURE

DATE

COGNIZANT MANAGER SIGNATURE

DATE