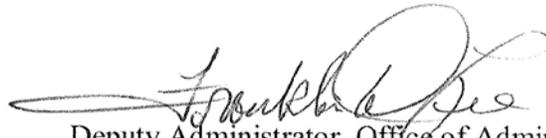


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MANDATORY GUIDANCE ON ACTUAL SUBSISTENCE FOR ALL TRAVEL

Signed by:



Deputy Administrator, Office of Administrative Operations



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1. PURPOSE

This Directive supplements the [Agriculture Travel Regulations](#) and the [Federal Travel Regulations](#) and clarifies agency policies and procedures governing actual subsistence. Actual subsistence is the reimbursement of actual expenses in lieu of per diem.

Travelers have at times sought for reimbursement of actual subsistence upon return from their travel. A request for authorization for actual expense reimbursement must be made in advance of travel. Post-travel requests for actual subsistence will only be allowed when exchange rate conversions resulted in expenses that exceeded the authorized per diem.

2. SPECIAL INSTRUCTIONS/CANCELLATIONS

This directive supersedes all prior policies issued by FAS regarding actual subsistence.

3. PRIMARY RESPONSIBILITIES / AUTHORITIES

- 3.1 **All Washington-Based FAS Personnel** are responsible for submitting requests for actual subsistence expense reimbursement prior to international travel. Detailed procedures are included in section 3.
- 3.2 **Foreign Service Officers** posted outside of the United States are governed by the Department of State, Foreign Affairs Manual (FAM), please see <http://www.state.gov/documents/organization/88651.pdf> Approvals for actual subsistence must be obtained from the U.S. Embassy Administrative Officer or their designee.
- 3.3 **FAS Administrator** holds the authority to approve actual subsistence expense reimbursement over 100% and up to, and including, 150% of the per diem rate (rounded to the next higher dollar). This authority cannot be redelegated, except in the temporary absence of the Administrator.
- 3.4 **USDA Office of the Chief Financial Officer** holds the authority to approve actual subsistence reimbursement in excess of 150% of per diem. This office also holds the authority to make adjustments to the per diem rate not to exceed the maximum rate set by the Federal Travel Regulations.

4. MANDATORY POLICY & REQUIRED PROCEDURES

4.1 Warranted Actual Expense Reimbursement:

Actual expense reimbursement (known as Actual Subsistence) is warranted when:

- 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 (e.g., sporting events, conventions, 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 from occupying less expensive lodging; or
- Mission requirements necessitate.

4.2 Required Timeframe for Requesting Actual Expense Reimbursement

A request for authorization for actual expense reimbursement must be received by the appropriate approving official at least 3 working days in advance of the traveler's departure date.

Actual expense reimbursement will only be approved after travel is completed (“post-approval”) when one of the following occurred:

- Emergency situations in which requests for prior travel authorization were not possible;
- Unanticipated, unusual, and exceptional circumstances resulted in the incurrence of actual and necessary subsistence expenses that were much greater than the authorized per diem allowance (ATR 9(d)); or
- Changing foreign exchange rates caused expenses to exceed the per diem rate.

Post-approval requests must be supported by acceptable explanations (e.g., unfavorable foreign exchange changes).

4.3 Required Documentation for Unavoidable Actual Subsistence Expense

You should document your efforts to locate lodging within the per diem rate, including alternatives that might require additional transportation expenses and make a cost comparison between those alternatives and the actual expenses anticipated. You must also provide an explanation as to why the travel could not be delayed to avoid the need to incur actual subsistence expenses and why it was not possible to relocate the event to another venue that would avoid actual subsistence expenses. The cost comparisons should be included showing that the

actual subsistence requested is more cost effective than the alternate lodging plus ground transportation costs in the actual subsistence approval form section titled **Steps Taken to Find Lodging within Per Diem** or **Explanation of Why Trip Cannot Be Delayed**, as appropriate.

4.4 Required Forms for Actual Subsistence Expense Reimbursement

For actual subsistence up to and including 150%, the request for actual subsistence memo and form must be completed and sent to the Office of the Administrator:

<http://fastnet.usda.gov/01AdminOps/Travel/RequestActualSubsistenceForm.doc>
<http://fastnet.usda.gov/01AdminOps/Travel/RequestActualSubsistenceMemo.doc>

For actual subsistence over 150%, the request for actual subsistence memo and form must be completed and sent to the Office of the Chief Financial Officer:

<http://fastnet.usda.gov/01AdminOps/Travel/CFORequestActualSubsistenceForm.doc>
<http://fastnet.usda.gov/01AdminOps/Travel/CFORequestActualSubsistenceMemo.doc>

4.5 Maximum Amounts Reimbursed Under Actual Expense

As per the Federal Travel Regulations, the maximum amount that you may be reimbursed under actual expense is limited to 300 percent (rounded to the next higher dollar) of the applicable maximum per diem rate. (FTR §301-11.303).

<http://www.gsa.gov/Portal/gsa/ep/channelView.do?pageTypeId=17113&channelId=-24568&specialContentType=FTR&file=FTR/Chapter301p011.html#wp1089963>

4.6 Expenses Less than the Authorized Amount

When authorized actual expense and your expenses are less than the locality per diem rate or the authorized amount, reimbursement is limited to the expenses incurred.

4.7 Expenses Exceeding the 300 Percent Ceiling

The reimbursement is limited to the 300 percent ceiling. There is no authority to exceed this ceiling.

4.8 Expenses Required to Itemize Under Actual Expense

All expenses must be itemized, including meals, (each meal must be itemized separately) for which you will be reimbursed under actual expense. However, expenses that do not accrue daily (e.g., laundry, dry cleaning, etc.) may be averaged over the number of days your agency authorizes/approves actual expenses.

Receipts are required for lodging, regardless of the amount, and any individual meal when the cost exceeds \$75.

4.9 How Actual Subsistence Authorizations and Reimbursement Claims are Handled in GovTrip

The traveler must request actual subsistence in GovTrip in the travel authorization. When doing so, GovTrip will automatically show a pre-audit flag. The traveler needs to provide a short explanation in the pre-audit box for the actual subsistence request and complete the paper approval forms indicated in section 3.4 above. When actual subsistence is triggered, the document will be conditionally routed to the Office of the Administrator (OA) when signed by the traveler. The traveler needs to forward the paper approval forms indicated in section 3.4 through their Program Area for review and approval and then to OA. Once the paper request is approved by the Administrator or the Chief Financial Officer, as appropriate, the Office of Administrator will electronically stamp the document in GovTrip. The document would then continue to route to the Reviewing and Approving officials for any final approvals. The travel authorization will not be approved in GovTrip until after the electronic approval stamp is received. When the traveler receives the approved paper authorizations for actual subsistence, it needs to up-loaded into the GovTrip travel authorization for retention purposes and to support the filing of the travel voucher.

If the traveler seeks a post trip authorization for actual subsistence, no conditional routing of the travel reimbursement claim to the OA will occur. Program Area management approving the reimbursement claim are responsible for obtaining the paper approvals as stated above and ensuring that the necessary approvals are uploaded into GovTrip prior to approving the actual subsistence travel expense claim.

4.10 Reimbursement Claims Containing Per Diem and Actual Subsistence

Mixed travel may be authorized or approved on both a per diem basis and an actual subsistence expense basis during a single trip when travel is performed in

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several locations. However, only one method of reimbursement (prescribed per diem or actual subsistence expense) will be authorized within the same day.

5. MANDATORY REFERENCES

5.1 Federal Travel Regulations

http://www.gsa.gov/graphics/ogp/FTR_entire.pdf

5.2 Agricultural Travel Regulations

<http://www.ocio.usda.gov/directives/doc/DM2300-001.htm>