GENERAL SERVICES ADMINISTRATION

Washington, DC  20405

February 1, 2019

Federal Travel Regulation

GSA Bulletin FTR 19-04

TO: Heads of Federal Agencies

SUBJECT: Reimbursement of fees for conventional and nonconventional lodging

1. What is the purpose of this bulletin? This bulletin clarifies what fees agencies may reimburse when employees use either conventional (e.g. hotels) or nonconventional lodging while on official temporary duty (TDY) travel.

2. What is the background of this bulletin? Fees charged in addition to the room rate have become more common in the lodging industry in recent years. Questions about the types of fees that may be reimbursed for both conventional and nonconventional lodging are also increasing. Per the Federal Travel Regulation (FTR) § 301-11.12(a)(4), agencies may reimburse employees for the costs of nonconventional lodging “when there are no conventional lodging facilities in the area (e.g., in remote areas) or when conventional facilities are in short supply.” Some of the fees associated with nonconventional lodging differ from fees charged by conventional lodging. Specifically, two common fees not seen in conventional lodging itemization are service fees and cleaning fees. Cleaning fees are traditionally subsumed in the hotel’s per-night charge.

3. With the number of additional fees in both conventional and nonconventional lodging increasing, how does the FTR § 301-2.3 (the “prudent person” rule) factor into agency reimbursement decisions? Agencies should apply the “prudent person” requirement as outlined in FTR § 301-2.3 in determining reasonability of any fees at both conventional and nonconventional lodging properties.

4. Are employees still required to use the agency’s E-Gov Travel Service (ETS) or Travel Management Company (TMC) to make travel arrangements? Yes, the requirement in FTR § 301-50.3 to use the agency’s ETS or TMC to make travel arrangements has not changed. However, use of ETS or a TMC may at times result in unreasonable burdens on mission accomplishment, such as during Presidentially Declared Disasters (when conventional lodging in the area may be in short supply) or for long-term TDY travel (when the type of lodging that meets the needs of a long-term traveler may not be available through mandatory booking channels). Agencies should first consider the use of a long-term lodging solution under GSA Schedules before searching for nonconventional lodging. These facilities typically include furnished apartments or condominium-type properties with appropriate amenities that meet the fire safety requirements of the Hotel and Motel Fire Safety Act of 1990 per FTR § 301-11.11(b); more information can be found at https://www.gsa.gov/longtermlodging. If the conditions in FTR § 301-11.12(a)(4) are met, agencies may authorize the use of nonconventional lodging and allow an employee to book this type of lodging outside the ETS or TMC channels.

5. What kinds of fees may agencies reimburse when an employee uses nonconventional lodging?

a. Authorized use. If nonconventional lodging is authorized by the agency, ideally in advance of travel, any fees such as service fees or cleaning fees may be reimbursed to the traveler. A service fee can be reimbursed as a miscellaneous expense. Any per-stay cleaning fees should be divided by the total number of days the traveler occupied the accommodations and was entitled to per diem to determine a daily amount. That daily amount should then be added to the base lodging cost to determine a total daily rate for the lodging. The total daily rate should be reimbursed at or below the prevailing maximum lodging per diem rate for the location, unless the agency authorizes actual expense reimbursement per FTR §§ 301-11.300 through 306.

b. Unauthorized use. Generally, service fees are incurred to pay for the use of the booking platform. The Government should not reimburse for the use of an outside booking platform when employees are required to use ETS or their agency’s TMC per FTR § 301-50.3. If nonconventional lodging is not authorized by the agency, agencies should not reimburse any service fees associated with the booking per FTR § 301-50.5, which states that employees “are responsible for any additional costs resulting from the failure to use the TMS or E-Gov Travel Service, including service fees, cancellation penalties, or other additional costs.” As with authorized use, any per-stay cleaning fees should be divided by the total number of days the traveler occupied the accommodations and was entitled to per diem to determine a daily amount. Then add the daily amount to the base lodging cost to determine a total daily rate for the lodging. The total daily rate should be reimbursed at or below the prevailing maximum lodging per diem rate for the location, unless the agency authorizes actual expense reimbursement per FTR §§ 301-11.300 through 306.

6. What kinds of conventional lodging fees can agencies reimburse? Conventional lodging properties, especially those in popular tourist areas, are increasingly charging fees variously termed “resort fees,” “amenity fees,” “urban destination fees,” “facilities fees” and “daily destination fees,” among others. Agencies should review these fees and see what they include before authorizing reimbursement, as they can vary from simply covering internet access to including items that may be considered gifts, like tours or tickets. If authorized, these fees can be reimbursed as a miscellaneous expense.

7. What is the applicable date of this bulletin? This bulletin is applicable upon the date of publication.

8. When does this bulletin expire? This bulletin will remain in effect until explicitly cancelled or superseded.

9. Whom should I call for further information? For clarification of content, please contact Jill Denning, Office of Government-wide Policy, Office of Asset and Transportation Management at 202-208-7642, or by e-mail at travelpolicy@gsa.gov. Please cite GSA FTR Bulletin 19-04.

By delegation of the Administrator of General Services,

Signed, February 1, 2019

/signed/

Jessica Salmoiraghi

Associate Administrator

Office of Government-wide Policy