



DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

OFFICE OF THE ASSISTANT SECRETARY

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MEMORANDUM FOR AFIMSC/RMF, NGB/FM, AFRC/FM, AND
ALL COMPTROLLER SQUADRONS AND FLIGHTS

FROM: SAF/FMFSI (AFAFO-F)
1960 1st St. West, Bldg. 977
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SUBJECT: Clarifying Guidance for Nonconventional Lodging (Airbnb, VRBO etc.)

Statute and regulation preclude Federal and Government employees from booking and staying at AirBnB and other types of nonconventional lodging/rental properties for temporary duty (TDY). Below is a discussion of those statutes and regulations. Additionally, included are discussions of situational exceptions when AirBnB may be authorized as nonconventional lodging.

The Joint Travel Regulation (JTR) mandates a traveler on TDY reserve lodging compliant with U.S. Fire Administration Guidelines through the servicing Travel Management Company (TMC). When TDY, a DoD traveler must use the Integrated Lodging Program (ILP) facilities if available. Each Service or DoD agency must ensure that 90% or more of all official travelers in the US or non-foreign areas OCONUS use commercial lodgings that comply with the U.S. Fire Administration guidelines.

However, as an exception, if no government or commercial lodging facility is available at the TDY location or a room shortage exists because of a special event, remoteness, or shortage, the cost of nonconventional lodging (obtained in other than a commercial facility) may be authorized or approved. Approval may be granted, when the traveler provides a written explanation of non-availability acceptable to the Approving Official, and the explanation is included with the authorization/voucher. Reimbursement cannot exceed the locality per diem rate. (JTR Table 2-15)

Additionally, The DoD Financial Management Regulation Volume 9 requires an itemized receipt for each lodging expense regardless of the amount. Lodging receipts must be itemized with daily room costs, taxes, and miscellaneous fees. While some vacation rental websites may offer this type of receipt, many do not (e.g., they combine taxes and fees into a single line item or they only show the total tax and not a daily breakdown). JTR Note: A lost receipt statement cannot substitute for an online-booking hotel receipt.

Travelers must use the TMC for booking lodging, and they must follow the ILP policy requirements to the maximum extent possible. Failure to follow JTR guidance that requires use of TMC or suitable commercial lodging is not a reason to deny reimbursement, but will limit reimbursement to the applicable government or locality rate.

FTR bulletin 19-04 regarding service fees

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

- **Authorized use.** If nonconventional lodging is authorized, 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.

- **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 their agency's TMC. If nonconventional lodging is not authorized by the agency, agencies should not reimburse any service fees associated with the booking per JTR Table 2-16, which states that employees "are responsible for any additional costs resulting from the failure to use the TMC, 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.

2. 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. The JTR states that these fees may be reimbursed as a miscellaneous expense, but they must be authorized on the member's authorization before the travel begins. There is no authority to approve payment for these fees after the fact (JTR Table 2-16).

Request widest dissemination to allow Airmen to make proper decisions IAW JTR while obtaining lodging for official travel. Questions should be directed to local Financial Services Office, HQ AFIMSC/RMF, NGB/FM, AFRC/FM, or SAF/FMFSI (AFAFO-F).

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