DEPARTMENT OF THE AIR FORCE
WASHINGTON, DC

OFFICE OF THE ASSISTANT SECRETARY

14 October 2024

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

FROM: SAF/FMFF
1500 W. Perimeter Rd. Ste 3150
JB Andrews, MD 20762

SUBJECT: Clarifying Guidance for Nonconventional Lodging

This policy memorandum is effective immediately and supersedes the previous version, "Clarifying Guidance for Nonconventional Lodging (Airbnb, VRBO, etc.)" dated 20 September 2021.

Statute and regulation preclude DoD employees from directly booking and utilizing Airbnb and other types of nonconventional lodging/rental properties for temporary duty (TDY) and Permanent Change of Station (PCS) travel. Below is a discussion of those statutes and regulations with situational exceptions when nonconventional lodging may be considered and authorized, while on official travel orders.

The Joint Travel Regulation (JTR) mandates travelers must reserve lodging, compliant with U.S. Fire Administration Guidelines, through the Government electronic travel system or the servicing Travel Management Company (TMC). When TDY, a DoD traveler must use the Integrated Lodging Program (ILP) facilities if available. DAF travelers must utilize DTS or the servicing TMC for booking lodging, and must follow the ILP policy requirements to the maximum extent possible.

As an exception, if no government or DoD Preferred commercial lodging is available at the TDY location, or a room shortage exists because of a special event, remoteness, or shortage, and the traveler provides a Certificate of Non-Availability (CNA), then nonconventional lodging may be authorized or approved. Approval may be granted, only when a written explanation is provided, detailing the non-availability of a DTS or TMC ILP facility. The explanation must be validated and authorized by the Approving Official and must be included on the DTS authorization and voucher. Reimbursement cannot exceed the locality per diem rate (JTR Table 2-15).

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 companies offer this type of receipt, many do not (e.g., taxes and fees are combined into a single line item or they only show the total tax and not a daily breakdown). Note: A lost receipt statement cannot substitute for an online-booking hotel receipt.

Although there are exceptions which allow the approval of nonconventional lodging, it is not recommended for several reasons. Travelers must understand the risks they are assuming by opting to use non-government procured lodging. We caution approving officials to properly advise their travelers and to consider the following before authorizing the use of nonconventional lodging for official travel: 1.) A valid, itemized receipt must be submitted to receive reimbursement of lodging expenses. Many nonconventional lodging companies do not provide documentation to meet the requirement and a lost receipt is not authorized for lodging expenses; 2.) Travel orders are often canceled or modified with date changes. Government procured lodging ensures travelers do not incur any expenses for cancellations. This is not always true of self-procured lodging options. Travelers assume risk when they self-procure non-refundable lodging reservations; and 3.) Non-government procured lodging options are not properly vetted through DoD channels to ensure they meet fire and safety standards.

Further, updates to the JTR as of Nov 1, 2023 offer clarification of the following:

1) **What agencies <u>may</u> reimburse when an employee uses nonconventional lodging?**
   a) <u>Service Fees</u>: If nonconventional lodging is authorized (in advance of travel), ideally within DTS, a reasonable itemized service fee limited to the amount of the fee charged by the TMC when required to make manual reservations in reimbursable to the traveler (JTR Table 2-16).
   b) <u>Taxes</u>: Itemized receipts for lodging must separate the taxes from any additional room expenses and applicable fees. Online booking receipts often break out the cost of the room, but combine taxes and fees. In such cases, only the room costs may be reimbursed (JTR 020303 A.4 and Table 2-15).
   c) <u>Cleaning Fees</u>: Any per-stay cleaning fees are part of the lodging cost, and should 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 maximum lodging per diem rate for the location (JTR 020303 G and Table 2-15).

2) **What agencies <u>may not</u> reimburse when an employee uses nonconventional lodging?**
   a) <u>Lodging facilities</u>: Commercial lodging is commercially operated and must be equally available to the general public, which is under the authority, direction, and control of the USD (P&R) and overseen by the Defense Travel Management Office (DoDI 1015.11). Facilities such as Squarespace Rental, Crash Pad, LLCs, and similar websites which are not listed to the public, **must not be used** for official government travel. Non-Public listed facilities cannot be verified for adherence to regulatory guidelines.
   b) <u>Transaction Fees</u>: Reimbursement of transaction fees are not authorized when a traveler personally procures lodging outside the electronic travel system (DTS) or available TMC (JTR Table 2-16).
   c) <u>Resort and Amenity Fees:</u> Lodging facilities in popular tourist areas frequently assess various fees termed "resort fees," "amenity fees," "urban destination fees," "facilities fees" and "daily destination fees," among others. These fees must be itemized and may be approved ONLY for conventional lodging establishments such as hotels and motels and are not authorized for nonconventional lodging (JTR Table 2-16).

Request widest dissemination of this guidance to assist DAF travelers and approving officials to make proper decisions IAW JTR while obtaining lodging for official travel. Travelers should address any questions regarding this memorandum to their local Financial Services Office, who may consult AFIMSC/FMF, NGB/FMF, or AFRC/FMF for additional information or guidance. If required, these offices may elevate to the Air Force Finance Office, SAF/FMFF.

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