**Required Use of the Travel Management Center (TMC) for Lodging FAQs**

**References:**

A. Department of Homeland Security (DHS) Financial Management Policy Manual

B. 41 Code of Federal Regulations, Chapter 301-11.11, Federal Travel Regulations (FTR)

C. Joint Travel Regulations (JTR),010201-C and 020303

D. 41 Code of Federal Regulations, Chapter 301-11.11

E. Joint Travel Regulations (JTR), 010201-C and 020303

F. Government Travel Charge Card (GTCC) Program Policies and Procedures, COMDTINST M4600.18 (series)

G. 41 Code of Federal Regulations, Chapter 301-50.7

**Background -** Per Refs A through C, travelers must make all travel reservations, including lodging, for Coast Guard funded travel through the contracted TMC (CWTSato). Booking lodging reservations directly with the hotel, using commercial websites such as Expedia.com, Hotels.com, AIRBNB, etc. violates these requirements. DHS requires that all reservations made outside of the TMC be authorized per travel order endorsement.

**Why is this requirement all of a sudden being enforced?** DHS has initiated audits of reservations made outside of the TMC following an Office of the Inspector General (OIG) audit of offline reservations made across DHS components. While the OIG’s audit was primarily focused on travelers not using the online booking options offered via the TMC, the audit findings have resulted in DHS increasing their oversight of these transactions.

**What if I plan to utilize military lodging?** If your orders direct you to use Government Lodging or you elect to use government lodging (Ex: BOQ, Barracks, AF Inn, etc.), then use of the TMC is not required. The TMC does not have the ability to make reservations at government lodging facilities.

**Why is the SATO fee for a hotel only reservation charged immediately?** When SATO makes a reservation for airfare and other items like hotel or a rental car, the service fee is assessed when the airline ticket is charged. However, when there is no airline reservation, such as a hotel only reservation, the service fee is charged immediately.

**Am I responsible for paying the SATO fee for a hotel only reservation before I complete the travel?** Cardholder’s are responsible for paying the GTCC balance in full on or before the due date, regardless of reimbursement. Travelers may request a travel advance if paying the service fee will cause a financial hardship.

**Does this requirement apply to PCS Lodging, such as Temporary Lodging Expense (TLE) or Temporary Lodging Allowance (TLA)?** No. Reservations for TLE or TLA lodging are not required to be made through the TMC. However, for PCS travel per JTR par. 5014 it is mandatory policy for all members to use an available TMC for all official transportation requirements. So when a member travels by air, train or ferry during PCS travel they are required to use a TMC. Even though JTR Chapter 4, which addresses TDY travel, requires TMC use for lodging there is no such requirement in JTR Chapter 5 (PCS travel). For PCS travel TMC use is not required for lodging.

**If I am attending a conference or other group function where a block of rooms have been reserved, do I need to make my reservation for lodging through the TMC (SATO)?** No, travelers are not required to use our TMC (SATO) to make lodging reservations for conferences when the conference sponsor has negotiated and set aside rooms at one or more lodging facilities. However, the orders need to note this exemption.

**As a Coast Guard Reservist with Active Duty for Training (ADT) orders, am I required to make my reservation for lodging through the TMC (SATO)?** Yes, just like any TDY orders if commercial lodging is authorized, then the reservation shall be made via ETS.

**Do group lodging requests need to be processed through the TMC (SATO)?** No, In accordance with Refs E and G, a Coast Guard employee or military member who is coordinating a large group event (such as a training course, exercise, or conference with 10 or more attendees) is authorized to negotiate directly with one or more lodging facilities to set aside a specific number of rooms for attendees, and require attendees to book lodging directly with the lodging facility. However, the conference planner should not enter into a contract with any lodging facility that guarantees the Coast Guard will pay for a specific number of rooms, unless the conference planner is a contracting officer who is authorized to do so. The recommended best practice for negotiating with a lodging facility is as follows: (1) The conference planner should negotiate an agreement with the lodging facility to hold a specified number of rooms at a specified rate at or below the local lodging per diem rate until a designated date; (2) After the designated date, the lodging facility will be free to release any rooms that have not been reserved by individual attendees; (3) Individual attendees should be directed to reserve their individual room with the lodging facility under the group reservation before the designated date. Any reservations made at another lodging facility or after the designated date shall be made through the Travel Management Center which currently is SATO.

**I am trying to make a reservation in a remote location and there is no lodging listed in the online system, what do I do?** You will need to call SATO and speak with an agent. If you have a specific hotel in mind, provide them with that information. Please note that the online booking system is based on the hotel paying to be included in the Global Distribution System (basically the travel industries network). If the hotel is a small mom & pop enterprise they may not pay for this service so the agent would have to call the hotel directly to make the reservation.

**Are there any exemptions for emergency deployments, OCONUS travel, evacuations/safe haven lodging, last minute/unanticipated lodging, medical leave, invitational travel or rest over-night lodging requirements?** No, the only known exemptions are listed in the references, ALCGPSC 067/18 and this FAQ.

**What if I don’t have a travel card; am I required to use the TMC for lodging?** Yes if you are also arranging commercial travel that will be billed to the CBA, the TMC shall be used to secure lodging. This ensures the travel fee is billed at the time travel is ticketed. If no commercial travel is required, such as travel by GV or POV, use of the TMC is not required.

**Can I request a waiver of this policy?** If a command disagrees with this policy interpretation or desires a waiver of the lodging reservation requirement, they may submit a memo detailing their issue with any JTR/FTR analysis and specific documentation/justification for the request to COMDT (CG-13).

**What should I do if the only lodging available through SATO is above the local lodging per diem rate?** In this case, you should request the SATO agent provide a statement to you via e-mail.  The SATO agent will send an e-mail that states “Unfortunately, CWTSato is unable to find any available, suitable commercial lodging that is within the per diem limits for your requested travel to CITY, ST on the dates of MM/DD/YYYY to MM/DD/YYYY.”  With this information, you may request your Approving Official authorize a higher per diem rate on your travel orders and complete the reservation with SATO.  Alternately, if you are able to find a within per diem rate directly from a hotel without going through a 3rd party internet service like Travelocity, Hotels.Com, etc. then you can make your reservation directly.  The e-mail from the SATO agent would serve as the documentation of non-availability detailed in paragraph 2.B of ALCGPSC 067/18.

**Can I book through AirBNB?** Updated 8/16/18. No, per CG-1332 and the Defense Travel Management Office (DTMO), AirBnB is a not considered a commercial lodging facility and should not be used.

**I want to use my travel trailer and stay at a campground; do I need to make the campsite reservation through SATO?** Yes, the campsite is considered lodging and therefore the reservation must be made via SATO. To facilitate this reservation, you should call SATO with the desired campground name and contact information so SATO can process the reservation. If the SATO agent is unable to process the reservation, you should request the SATO agent provide a statement to you via e-mail.  The SATO agent will send an e-mail that states “Unfortunately, SATO is unable to find a campsite reservation for your requested travel to CITY, ST on the dates of MM/DD/YYYY to MM/DD/YYYY.”  Then if you are able to find a within per diem rate directly from a campground without going through a 3rd party internet service then you can make your reservation directly.  The e-mail from the SATO agent would serve as the documentation of non-availability detailed in paragraph 2.B of ALCGPSC 067/18.

**Summary:** The table below provide the potential exemptions where the orders Approving Official can add an authorization to book outside of the TMC.

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| **Exemptions** |
| * Government quarters |
| * Travel order endorsement with documentation from TMC proving non-availability of within per diem lodging. Note - you cannot determine unavailability via online booking system. |
| * Non-GTCC card holder and reservation does not include travel charged to CBA |
| * When use of GTCC is prohibited by COMDTINST M4600.18, such as TDY over 21 days without interim travel claims and reservation does not include travel charged to CBA |
| * Group Lodging reserved by an event planner |
| * Lodging during PCS Travel, TLE/TLA |