



# FINRA Arbitrator Travel Policy

## Statement of Purpose

Thank you for agreeing to serve as an arbitrator for FINRA's Office of Dispute Resolution. With the establishment of this policy, FINRA seeks to provide guidelines that serve the interest of both the arbitrator and FINRA.

It is FINRA policy to reimburse arbitrators for ordinary, necessary and reasonable expenses incurred while traveling on behalf of FINRA. Depending on an arbitrator's reimbursement category, this may include air, rail, hotel, taxi, ride share services and local ground transportation, and any meals not provided by FINRA.

## Arbitrator Reimbursement Categories

**Category A:** Arbitrators who live or work within 75 miles of their primary hearing location.

**Category B:** Arbitrators who live more than 75 miles from their primary hearing location.

**Category C:** Arbitrators who are asked by FINRA to serve in a hearing location in addition to their primary hearing location.

**Category D:** Arbitrators who have a secondary hearing location in close proximity to their primary hearing location.

## Category A and D Arbitrators

**Category A and D Arbitrators will be reimbursed for:**

### Local Transportation

Commuter trains, subways, buses or other forms of convenient, low-cost public transportation should be used whenever possible. If a personal automobile is used, FINRA uses a standard mileage charge to calculate expenses. Arbitrators will be reimbursed for mileage (up to 75 miles each way), parking and toll charges incurred traveling to and from the hearing location. FINRA tracks the IRS mileage rate changes and will update arbitrators accordingly. Actual miles driven should be entered on the expense report.

### Meals

Arbitrators will be reimbursed up to \$25 for meals (including tax and tip towards the purchase of meals). Alcoholic beverages are not reimbursable. Receipts or credit card statements are requested for all meal expenses up to \$25. FINRA will reimburse arbitrators for meals up to \$25 without a receipt or credit card statement. However, IRS guidance requires FINRA to report unsubstantiated meal reimbursements (*i.e.*, those without a receipt or credit card statement) to the IRS as taxable income.

### Are e-tickets considered receipts?

E-tickets are acceptable when the traveler's name, dates of travel and payment information are clearly identified. Otherwise, receipts must show the form of payment, traveler's name, fees paid and dates of travel.

## Category B and C Arbitrators

### **Category B and C Arbitrators will be reimbursed for:**

#### **Air and Rail Travel**

FINRA will reimburse arbitrators for economy class air travel and fees for one piece of checked luggage. Travelers may upgrade seating within economy class (window, aisle, or bulkhead) on direct flights of four hours or more. Rail service may be ticketed on Amtrak Northeast Regional or Acela business class trains. Airline/rail upgrades to first or business class are not reimbursable. The use of frequent flyer reward points in lieu of the purchase of a ticket is also considered non-reimbursable. Fees for early boarding are only reimbursed for flights on Southwest Airlines and only for Early Bird Check-in when purchased in advance of check-in. FINRA will not reimburse same-day early boarding purchased at the gate.

Please note that while all meals, pillows and blankets purchased in-flight are reimbursable, all other items—such as alcoholic beverages, headsets, movie rental and air phone—are not reimbursable.

FINRA has negotiated corporate rates with a number of travel providers. As such, it encourages arbitrators to use FINRA's corporate travel management provider, ADTRAV, for assistance in making all travel arrangements.

#### **Arranging travel through ADTRAV offers benefits for FINRA and arbitrators alike:**

- The FINRA Corporate Travel Services Department can track travel, notify travelers of changes or delays, and revise itineraries if needed.
- Air and rail tickets are billed directly to FINRA, so no travel and expense submission is required.
- Travelers have no out-of-pocket costs for air/rail travel.
- Agents can book travelers' preferred carriers.
- Travelers may still earn airline/rail reward points.
- 24-hour emergency call service.

Once a hearing location has been confirmed, FINRA staff will complete a Non-Employee Travel Request Form for an arbitrator and email it to ADTRAV. This normally occurs up to six weeks prior to a hearing date. The information will be loaded into the travel system within 48 hours of receipt. From there, arbitrators should contact ADTRAV directly at (855) 764-2777 or (205) 949-4200 during regular business hours: Monday – Friday, 8 a.m. – 8 p.m. Eastern Time.

When they call, arbitrators (or their travel arrangers) must provide the case name and date of the hearing. This will enable the agent to locate the arbitrator's name and hearing information and provide more detailed service.

If arbitrators choose not to use ADTRAV to book their air or rail travel, they should book refundable airfare/rail tickets directly through the airline/Amtrak rather than through third-party booking sites (e.g., Expedia, Travelocity, Orbitz). Reserving directly with the provider allows arbitrators to book a reservation that is fully refundable.

## Ground Transportation

### Taxi and Public Transportation

Taxis and public transportation should be used when traveling between the airport or train station and the hotel.

### Ride Share Services

For ride share services such as Lyft and Uber, economy and regular service levels will be treated as the equivalent of a taxi. Tips are reimbursable when included in the ride cost or added in when charged to the traveler's credit card. Luxury service levels, such as SUV and black car options, are not reimbursable.

### Rental Cars

Rental cars are generally not needed for hearings and are not reimbursable. However, if a rental car is necessary, preapproval is required.

If a rental car is approved, the optional collision damage waiver should be declined, since FINRA maintains insurance coverage for any damages. Refueling options at the rental counter should also be declined. Travelers are responsible for refueling the rental car before returning it to the rental agency.

### Personal Automobile

If a personal automobile is used in lieu of air or rail service, FINRA uses a standard mileage charge to calculate expenses. Arbitrators will be reimbursed for these costs, along with relevant tolls and parking, up to the cost of either airfare or an Amtrak train ticket. FINRA tracks the IRS mileage rate changes and will update arbitrators accordingly.

## Lodging and Related Expenses

Arbitrators may be reimbursed for lodging on the night before the hearing. The lodging must be at the hotel where the hearing is scheduled or at a reasonably priced hotel nearby.

FINRA encourages arbitrators to contact ADTRAV for assistance in booking hotels. When staying at a hotel booked by FINRA, the room and tax charges will be billed directly to FINRA. Arbitrators are responsible for payment of all incidental charges (*e.g.*, mini-bar, room service, telephone calls) incurred at the hotel, and may submit reasonable expenses to FINRA for reimbursement within the policies described below.

If arbitrators choose not to use ADTRAV to book their lodging, arbitrators should book lodging directly through the hotel rather than through third-party booking sites (*e.g.*, Expedia, Travelocity, Orbitz). Reserving directly with the hotel allows arbitrators to book a reservation that is fully refundable.

Lodging expenses incurred in conducting FINRA business, including reasonable meals and phone/fax and internet service, will be reimbursed. Personal expenses—such as health club, clothing, gifts, athletic equipment, movies and spa services—are not reimbursable.

Reimbursement requests must include the original itemized statement from the hotel, containing a "\$0.00" balance and the last four digits of the credit card used (which indicates proof of payment). Express checkout receipts that do not indicate a "\$0.00" balance will not be reimbursed.

Arbitrators staying in a private residence with family or friends, instead of in a hotel, while traveling on business are eligible for reimbursement for a host gift (no cash or gift cards) not to exceed \$100 per trip (receipts required).

## Meals

Arbitrators will be reimbursed up to \$75 for meals (including tax and tip towards the purchase of meals). Arbitrators traveling for business in Puerto Rico will be reimbursed up to \$100 for meals (including tax and tip towards the purchase of meals). Alcoholic beverages are not reimbursable. Receipts or credit card statements are **required** for all meal expenses greater than \$25. Receipts or credit card statements are **requested** for all meal expenses up to \$25. FINRA will reimburse arbitrators for meals up to \$25 without a receipt or credit card statement. However, IRS guidance requires FINRA to report unsubstantiated meal reimbursements (*i.e.*, those without a receipt or credit card statement) to the IRS as taxable income.

## Spouse/Guest Expenses

Spouse and guest expenses are not reimbursable.

## Personal Travel Combined with FINRA Business

If travel to a hearing is combined with other non-FINRA-business travel, only those expenses directly attributable to the hearing are reimbursable. Arbitrators should contact FINRA staff in advance, and they will work with the Corporate Travel Services Department to establish what would be reimbursed and the best method to make reservations.

## Gratuities and Incidentals for All Arbitrator Types

All gratuities must be reasonable. Arbitrators should include the gratuity in the total amount requested for a particular expense and itemize it in the expense report. Because the amount allowed for meals needs to include the gratuity amount, the gratuity must appear in the receipt provided by the food vendor. Any non-meal gratuity of \$10 or more requires a receipt. Additional supporting documentation may be requested at the discretion of FINRA. FINRA provides the following guidelines for tipping:

**Cab fare:** 20 percent

**Meals:** 15 – 20 percent

**Housekeeping services:** up to \$2 per night

**Baggage assistance:** \$2 per bag

**Car valet:** \$2 per driver

Travelers will also be reimbursed for laundry/dry cleaning/suit pressing services, with a cap of \$60 per week, for trips of at least six consecutive nights. Only such expenses charged while on travel will be eligible for reimbursement; travelers will not be reimbursed for any laundry/dry cleaning costs incurred after they return home.

## Claims for Reimbursement

All FINRA Arbitrator Expense Reports must be [submitted](#) within 30 calendar days of the date the expense was incurred. Additional copies of the Arbitrator Expense Report are available at FINRA's Arbitration and Mediation website or from the FINRA liaison.

Please upload your FINRA Expense Report and any attachments to the DR Portal or email the documents to the Case Administrator assigned to your case.

All reimbursable expenses should be itemized on the FINRA Expense Report. Receipts or credit card statements are **required** for all meal expenses greater than \$25. Receipts or credit card statements are **requested** for all meal expenses up to \$25. FINRA will reimburse arbitrators for meals up to \$25 without a receipt or credit card statement. However, IRS guidance requires FINRA to report unsubstantiated meal reimbursements (*i.e.*, those without a receipt or credit card statement) to the IRS as taxable income.

In completing expense reports, arbitrators must include the following in the space provided:

- Arbitrator ID number,
- Case number (include in "Overall Business Purpose" section) and
- Case name (include in "Overall Business Purpose" section).

Any questions or concerns regarding travel policy or service issues may be directed to Stefanie Kendall in the Office of Dispute Resolution at (212) 858-4132 or [stefanie.kendall@finra.org](mailto:stefanie.kendall@finra.org).