To the Assemblée d’École of the EPFL,

As PhD Representative and Delegate of the Doctoral School of Architecture and Sciences of the City (EDAR), we hereby present our position regarding the *Directive concerning professional travel and the reimbursement of expenses* (LEX 5.6.1).

In general terms, we approve of the Vice-presidency for Finance’s proposal, as well as the reasons for its implementation. Regarding the impact on PhD students in particular, namely those of the EDAR, our evaluation is based on two fundamental aspects. First, an institution like the EPFL is necessarily a global institution, meaning that its researchers must work in a global perspective too. Professional traveling constitutes an indispensable element of this premise. It is absolutely crucial for the quality of a doctoral student’s research and for their personal development, as well as for the EPFL’s own international reputation and influence. Second, the EPFL offers its doctoral students excellent conditions for all kinds of professional travel. This privilege, however, should not be abused of, deliberately or unintentionally, under the risk of compromising the possibility of all PhD students benefitting from it as best and as often as possible. We believe the proposal safeguards these two points.

We also note that the new Directive is significantly more complex than the previous one. One the one hand this guarantees tighter control over spending, nearly always in a realistic manner – which is to say that the rules fit the practical requirements of professional traveling. On the other hand, this complexification, while requiring the doctoral student to be more conscientious of spending, does not, for the most part, present an excessive
complication when traveling. In the end, should one act in good faith, the boundaries of what is and is not acceptable spending should be as clear as they were before.

The EDAR PhD Representative and Delegate nevertheless make use of the public consultation period to present some specific remarks, concerns, and suggestions, intended to further improve the proposed Directive. Among them, we must stress three particularly problematic items: Article 5.1, Article 20.3, and Annex 2.

Specific remarks

Article 5.1

There are many issues to be presented regarding Article 5.1. First, although the Directive indicates that the EPFL’s selected travel agency is *recommended* – from which one infers it is not *obligatory*, hence one may pay individually or even resort to other travel agencies – the general orientation is that this recommendation is, *de facto*, an obligation. Indeed, this interpretation is supported by the public consultation’s FAQ, answer 9 and 16 indicate; and even previous contacts with the EPFL legal department declared it to be obligatory – although, it ought to be noted, no convincing legal document was presented to back that claim. The most explicit evidence, though, is the Vice-presidency’s *Argumentaire* (page 2, bullet point 4), which clearly states the intention of rendering the recommendation mandatory.

Should the EPFL opt to make one travel agency obligatory, then it must ensure the quality of the agency it imposes. According to complaints received against the currently
selected agency, CWT, there are legitimate serious doubts that they can ensure this quality. Complaints include: constant miscommunication, with agents referring to the wrong countries, cities, and even means of transport, because the person in charge of the itinerary changes every day; impossibility of booking hotels at a cheaper rate arranged by conference organizers, forcing either the doctoral student to pay and then ask for a reimbursement, or the EPFL to pay more than it should; price discrepancies compared to direct on-site prices, which then sometimes drop when remarked upon; errors when consulting train schedules because, upon consulting a train operator’s website, the agent did not change the default time of the search engine to find other trains; and, most serious, not buying supposedly booked flights, leaving the traveler stranded mid-trip.

We understand that centralizing all travels in one agency should, in principle, ensure control over the prices. Indeed if travelers used their own agency or books for themselves, it would become difficult to control expenses and check inflated expenses, conflict of interests, and even frauds. However, if the EPFL forces all travelers to use one single agency, then it also becomes responsible for assuring that that agency can provide an acceptable service. Well-founded doubts have been raised against the current selection.

One final suggestion ought to be made about Article 5.1. At times, it may prove more advantageous, economically and otherwise, to organize trips with travel agencies at the destination. We request that this exception be considered, upon due rigorous justification by the traveler, and a minimal control system by the EPFL.
Article 15.4

By making Article 15.4 subject to Article 11.2, it seems like lodging expenses for the nights before and after an event are only permissible if these nights represent a saving relatively to the arrival and departure flights.

If it is the case, then this norm seems unrealistically restrictive: often conferences start early in the morning and end late in the evening, making it completely impossible for a researcher to attend the full length of the event without arriving the night before and departing the night after. We therefore request that this norm be less restrictive in this regard, or at least that Article 15.4 and Article 11.2 should be dependent on the event program, and / or acceptable justification for early arrival or late departure – e.g. the conference society’s director’s meeting or other group meetings taking place after the event, but not included in the program as an official event.

If this interpretation is incorrect, though, then we would request that the Article be clearer in this regard.

Article 16.3

The limit of CHF 30.00 per day on meals conflicts with Annex 2. If this is intentional, we recommend that it be made clear that Article 16.3 takes precedence over the amounts in Annex 2. If not, we request that the Article be rectified.
Article 17.2

Not only do we find that the times indicated here are rather peculiar, we absolutely object to the existence of this point in the article.

To start with, it is hard to understand why the EPFL would pay for almost all meals, except some that do not fall in specific times.

More importantly, though, it is contradictory with the various cost-restricting articles of the Directive, such as Article 11.2 or Article 15.1, and Article 15.4. This because the combination of travel and lodging costs is, in principle, that which is demanded by the EPFL: the most affordable or one of the most affordable possible within the rules. The traveler arrives or departs according first and foremost to the least expensive itinerary possible, and often even according to the EPFL’s selected travel agency’s itinerary. In other words, the itinerary and lodging are selected according to the requirements of what this Directive decrees to be the conditions for reimbursable “professional travel”. Therefore, in the scenario of a strictly professional trip, *everything* between the arrival and departure must necessarily be considered as a “period of professional travel.”. And according to the first point of the same article, 17.1.a), meal expenses include “meals consumed during periods of professional travel”. Therefore, *all* meals between arrival and departure must be included, regardless of arrival or departure time.

As the Directive currently stands, if, for example, a flight leaves at 9:30, a traveler may be deprived of breakfast, even though the traveler has no choice but to wait until this time to depart, according to the itinerary selected in compliance with the Directive. Likewise, arriving at 19:00, a traveler may be deprived of dinner. Furthermore, this article even
promotes dangerous behavior. For example, if one’s means of transport is a rented car, this article leads to the driver either to drive sleep-deprived to leave before 7:00, or to begin the journey without eating that day.

Not only do we consider the timeframes odd and unjustified, we find them in direct contradiction with the rest of the Directive, at the expense of the traveler. We therefore reject the article altogether, and suggest its abolition.

**Article 18.1**

A warning must be made about the services currently used by the EPFL regarding this article. At the moment, the recommended service used to request travel authorizations is the website https://cibtvisas.ch/. However, this website has been known to report false prices. For example, there are cases in which it indicates that EU citizens must request a VISA, costing up to CHF 322.02 when in fact the traveler only requires an ESTA (not a VISA), costing $14, directly in the US Government’s website.

We suggest that the EPFL look into this situation, to guarantee it has not been and will not be overcharged.

**Article 20.3**

This article includes a major procedural flaw that must necessarily be addressed in the final Directive.
According to this article, to open a travel request one must present an estimate for the trip’s costs. However, one can only request a budget from the travel agency after opening a travel request. This means that the traveler must, in one’s own time, search for trains, flights, airport shuttles, city transportation, hotels, and restaurants, in order to open a travel request; and after the travel request exists, the traveler must ask for the travel agency to do the exact same job. Worse still, the doctoral student cannot book the transportation and lodging indicated in the estimate because Article 5.1 *de facto* imposes that this be done by the travel agency.

The result is a pointless duplication of work, and an avoidable waste of considerable time spent in a lengthy and saturating series of useless searches.

Our suggestion is to replace the estimation of costs for an indication of the *kinds* of costs that shall be requested. For example, a traveler may indicate that, for a conference, the expenses will include: a return flight to city A; a two-night stay at city A; the meals for the corresponding days; and the payment of conference fees. It is then the travel agency’s job to find the best prices possible for the necessities of the trip.

### Annex 2

The *Indicative amounts for meal expenses* raise considerable doubts, as many of the determined limits seem to grossly underestimate the actual costs of traveling to these countries. One of the most shocking examples is Portugal, which assigns 8 CHF for Breakfast and 16 CHF for lunch or dinner (at the current exchange rate, approximately 7€ for breakfast and 14€ for lunch or dinner). While these prices may be practiced in many parts of Portugal,
they are certainly not the standard in the major and most visited cities like Lisbon and Porto. And yet it is precisely these cities that one is likely to be in for, say, a conference.

The unrealistic prices of Annex 2 open a serious problem: if the budget previewed by the EPFL is not sufficient for something as basic and fundamental as being fed, then the traveler may very well be forced to simply disrespect the budget. This opens a critical precedent though: if this annex of the Directive does not have to be followed, why should the rest? What other rules will be bent?

To avoid such a precedent, a breach that could compromise the enforcement of the entire Directive: either reviewing the breakfast and meal limits established in Annex 2; or adding a tolerance margin, which might either be a percentage relatively to the current table, or a fixed amount. The latter suggestion may also be a temporary fix until a more accurate table is produced.

**General remarks**

**Procedural**

A final comment ought to be made relatively to the public consultation process for this directive. The public consultation was launched on July 24th, two weeks after the end of teaching duties (i.e. *Projet de Master* exams, in the case of the EDAR), and will end on September 6th, two weeks before the beginning of the courses. This means that the whole process was carried during the summer break, in which many people are absent at different times for vacations, or simply to work abroad between the courses, making it nearly
impossible to discuss the matter with everyone at once, or even to ensure that many are informed of the changes taking place.

While we appreciate the idea of placing this item of discussion in a period with fewer distractions, we should note that it is not the ideal schedule to ensure a healthy discussion. This can be especially problematic, and even suspicious, in some other more polemic Directive in the future.

We thank the Vice-presidency for its work in improving the existing Directive concerning professional travel and the reimbursement of expenses, and the Assemblée d’École for considering our comments seriously, hoping that they shall provide a positive contribution to the final proposal.

Best regards,

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