

Travel and Entertainment (T&E) Substantiation Requirements

Internal Revenue Code Section 274(d)

Element to Be Proven	For Travel Expenses	For Entertainment Expenses	For Business Gift Expenses
Amount	Amount of each separate expense for transportation, lodging, and meals unless per diem rate used. Incidental expenses may be totaled in reasonable categories such as gas and oil, taxis, daily meals for traveler, etc.	Amount of each separate expense. Incidental expenses, such as taxis, telephones, etc., may be totaled on a daily basis.	Cost of gift.
Time	Date Taxpayer left and returned for each trip, and number of days for business.	Date of entertainment or use of a facility for entertainment. For entertainment directly before or after a business discussion, the time spent discussing business.	Date of gift.
Place	Name of City or other designation.	Name and address or designation of place or use of a facility for entertainment. Type of entertainment if not otherwise apparent. Place where business discussion was held if entertainment is directly before or after a business discussion.	Not applicable.
Description	Not applicable.	Not applicable.	Description of gift.
Business Purpose	Business reason for travel, or nature of business benefit gained or expected to be gained.	Business reason or nature of business benefit gained or expected to be gained. Nature of business discussion or activity if entertainment is other than "business meals."	Business reason for making the gift, or nature of business benefit gained or expected to be gained.
Business Relationship	Not applicable.	Occupations or other information – such as names or other designations – about persons entertained that show their business relationship to taxpayer. If all people entertained did not take part in business discussion, identify those who did.	Occupation or other information – such as name or other designation – about recipient that shows business relationship to taxpayer.