



# United States Department of the Interior

OFFICE OF THE SECRETARY  
Washington, DC 20240



AUG 18 2009

FINANCIAL MANAGEMENT MEMORANDUM 2009-033 (Vol. X.K)

To: Bureau Chief Finance Officers  
Bureau Assistant Directors for Administration  
Director, National Business Center

From: Daniel L. Fletcher,   
Director, Office of Financial Management

Subject: Travel of Non-Government Personnel to Attend Meetings and Conferences

Title 31 U.S.C. 1345 prohibits the expenditure of appropriations for travel, transportation, and subsistence for meetings, except as specifically provided by law. This section does not prohibit an agency from paying the expenses of an employee of the U.S. Government performing official duty which may include participation in a meeting or conference attendance. The Comptroller General has ruled that a person must be providing a direct service to the Federal government in order to qualify for travel and transportation under the definition of an employee as stated in 5 U.S.C. 5703 (55 CG 750). Mere attendance at a meeting or conference by a person not holding an appointment as an employee is not enough to qualify as an employee and allow payment of travel and/or transportation expenses, since there is no direct service being performed for the Federal Government.

Even though the Comptroller General recognized that conference attendance by some State and local officials could benefit an agency by gaining more acceptance and support for its programs, he maintained that this would not override the direct service requirement. Invited officials who participate in meetings and conferences as advisors (and/or by making presentations) are considered to be providing a direct service and may receive direct reimbursement of their travel and transportation expenses (unless they are performing as a contractor or as an employee of a Federal Government contractor). Persons who qualify as an employee by providing a direct service to the Federal Government may be provided a Federal Government travel authorization and/or transportation tickets, including Government contract fare tickets.

Federal grant funds may be used by the grantee to pay the travel expenses for attendance at meetings and conferences, unless specifically controlled by the terms and conditions of the grant agreement. Thus, a grantee may pay travel expenses which cannot be paid directly from an agency appropriation (55 CG 750). Personnel traveling for a grantee are not eligible to receive a travel authorization, transportation tickets, or direct reimbursement of their travel expenses from a Government agency.

If you have any questions regarding this information or if you require additional information, please contact Robert Smith ([Robert\\_Smith@ios.doi.gov](mailto:Robert_Smith@ios.doi.gov)) on 202-208-5684.

Replaces: FAM 98-012



# United States Department of the Interior

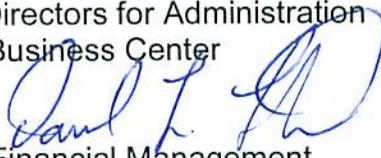
OFFICE OF THE SECRETARY  
Washington, DC 20240



AUG 18 2009

FINANCIAL MANAGEMENT MEMORANDUM 2009-035 (Vol. X.K)

To: Bureau Chief Finance Officers  
Bureau Assistant Directors for Administration  
Director, National Business Center

From: Daniel L. Fletcher,   
Director, Office of Financial Management

Subject: Clarification on Approval Needed for Internal Meetings

**1. Can internal meetings be exempted from the formal conference planning requirements?**

Yes, Program Assistant Secretaries may exempt internal meetings from the formal conference planning process. An exemption may be granted no more frequently than annually.

**2. What types of meetings qualify for exemption from the conference planning requirements?**

Internal meetings aimed at operational planning, reviewing results, or discussing issues. The meetings must meet all of the following criteria for an exemption:

- the focus is on internal Departmental matters;
- there are few (if any) outside attendees;
- the requirements for conference-type facilities are minimal; and
- the meeting does not require foreign travel.

Examples of these meetings include overseeing program activities, reviewing program results, conducting on-site reviews, determining "lessons learned", providing technical assistance, developing plans, etc.

**3. If an internal meeting has been exempted from the formal conference planning requirements, must the participants use trip-by-trip travel authorizations?**

No, travel for this purpose may be performed under an "open" or "limited open" travel authorization provided the bureau permits the use of "blanket-type" authorizations.

**4. If an internal meeting has been exempted from the formal conference planning requirement, may the conference lodging allowance (CLA) be approved and/or may light refreshments be provided?**

No, not under the provisions of Chapter 301, Appendix E of the Federal Travel Regulation (FTR). That authority does not extend to internal meetings exempted from the conference planning requirements.

For information on conferences under Chapter 301, Appendix E of the FTR, please refer to FMM 2009-036. FTR Chapter 301, Appendix E defines a conference as:

A meeting, retreat, seminar, symposium, or event that involves attendee travel. The term "conference" also applies to training activities that are considered to be conferences under 5 CFR 410.404.

If you have any questions regarding this information or if you require additional information, please contact Robert Smith ([Robert\\_Smith@ios.doi.gov](mailto:Robert_Smith@ios.doi.gov)) on 202-208-5684.

Replaces: FAM 2004-011