



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

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Memorandum

To: Assistant Secretaries
Heads of Bureaus and Offices
Solicitor
Inspector General
Special Trustee
Chief Financial Officers

From: Pamela K. Haze *Pamela Haze*
Deputy Assistant Secretary- Budget, Finance, Performance and Acquisition

Subject: Guidance on Reporting Conference Related Activities and Spending

This memorandum provides guidance on the management of conference activities and spending for the Department of the Interior. This memorandum supersedes earlier guidance issued on conferences including: a January 31st memorandum entitled *Guidance on Reporting Conference Related Activities and Spending* and an October 13, 2011, memorandum entitled *Conference Related Activities and Spending*. This guidance is consistent with the President's Campaign to Cut Waste, Executive Order 13589 -- *Promoting Efficient Spending*, and Office of Management and Budget (OMB) memorandums M-11-35 and M-12-12.

Overview of Changes in Conference Guidance

OMB Memorandum M-12-12, issued on May 11, 2012, directs the incorporation of additional limitations and controls for conference activities and spending necessitating the issuance of updated policies and procedures. Specifically, the guidance requires the following changes to our current process:

- The Deputy Secretary is to conduct line by line reviews of DOI sponsored conferences with estimated costs of over \$100,000 to ensure compliance with Federal travel regulations with regard to lodging, food and beverages, per diem reimbursement and compliance with Federal Acquisition Regulations (FAR) with regard to contracting for goods and services.
- Bureau Directors, Assistant Secretaries, the Deputy Secretary and other reviewers are to provide scrutiny to ensure that attendance and expenses are limited to only the levels required to carry out the mission of the conference.
- Interior and its bureaus and offices are not to incur net expenses greater than \$500,000 from their own funds on a single conference, including conferences we host or sponsor and those hosted or sponsored by other Federal or non-Federal entities. If exceptional

circumstances exist, the Secretary may provide a waiver from this policy based on the compelling purpose and exceptional circumstances of the conference in question.

- Interior and its bureaus and offices are to report publicly all conferences that are in excess of \$100,000 on a dedicated place on the official Interior website. The website is also to include information on waivers issued and net conference spending for the fiscal year. By January 31 of each year (beginning January 31, 2013), the site is to report a description of all agency-sponsored conferences from the previous fiscal year where the net expenses were in excess of \$100,000. The information reported is to include the total expenses, location, date, how the conference advanced the Department's mission, and the total number of individuals whose travel expenses or other conference expenses were paid by Interior, its bureaus or its offices.

Conference Policies and Procedures

In order to support our assurances that the Department and its bureaus and offices are managing conference activities in compliance with OMB direction and under the oversight of the Deputy Secretary, each bureau and office is required to comply with these procedures and to maintain policies and controls to mitigate the risk of inappropriate conference activities and spending.

Conference Direction and Coordination

The Office of Financial Management (PFM) is coordinating the conference approval process on behalf of the Department. PFM is the liaison with OMB and provides direction and assistance to Assistant Secretaries, bureaus and offices in the implementation of these policies and procedures. The Deputy Assistant Secretary – Budget, Finance, Performance and Acquisition (DAS-BFPA) is the senior career official responsible for oversight and implementation of these policies and approves/disapproves conferences that are below the \$100,000 threshold and recommends disposition of conferences for the Deputy Secretary's action.

Annual Conference Plans

Bureaus and offices are asked to maintain an annual plan of anticipated conference activity for each fiscal year to promote planning and effective management of conferences. The plan is to be submitted at the beginning of the fiscal year to the Office of Financial Management and updated as plans change throughout the year. The annual plan will include all conferences you plan to host for 30 or more individuals and where 15 or more of the individuals attending will be in travel status. Your plan should also include conferences hosted by other entities at which 15 or more of your employees will be attending. The plan will be used by PFM to inform the Deputy Secretary and monitor conference approval requirements. Updates to the annual plan, if necessary to reflect changes, should be provided quarterly. Attachment I provides fuller definitions and a template for the annual conference plan, as well as quarterly updates.

Conference Point-Of-Contact (or Coordinator)

Each Assistant Secretary and bureau or office shall designate a conference point-of-contact (POC) to coordinate requests for conference approval and to act as a liaison between the Department and each bureau or office. PFM will maintain an updated list of coordinators. Please keep them informed of personnel changes. To enhance the effectiveness of the conference approval process, the POC should be familiar with the bureau or office conference planning requirements as they pertain to travel of attendees and consult with acquisition officials

to ensure compliance with the FAR in contracting for conference related goods and services. The POC will be responsible for tracking conference activity and spending, submitting the annual plan and updates, and ensuring that each conference approval package is complete, proper reviews are performed, and appropriate approvals are obtained.

Conference Review and Approval Process

For all conferences your bureau or office hosts that involve 30 or more individuals where 15 or more are in travel status, or for attendance to a conference hosted by another entity where 15 or more of your employees will be attending, or if a conference is expected to cost \$100,000 or more, a conference approval package will need to be submitted to PFM by your conference coordinator. Conference approval requests should be submitted to PFM at least two weeks prior to the start of the conference to allow appropriate time for review and approval. This is especially true of annual conferences or any conference with anticipated expenses over \$100,000. Retroactive approvals will no longer be granted for conferences that have already occurred. Please submit your conference approval package before sponsoring a conference or committing to participation in conferences.

To ensure all appropriate factors have been considered in planning the conference, each approval request should contain an agenda for the meeting, a cost analysis if multiple locations were considered, a listing of the travelers and their estimated travel costs, and a completed Checklist for Evaluation of Proposed Conference. The checklist includes a requirement for a cost estimate. The costs should be inclusive of costs as defined in the section below entitled *Conference Expense Components*.

The checklist is provided as Attachment 2. The checklist is the primary tool used to evaluate conference plan requests.

Bureaus and offices are highly encouraged to conduct conference activity at a Federal facility whenever possible. This will be a specific review point by PFM and a question on this requirement is incorporated in the checklist. We also ask that you be particularly sensitive in the use of Federal funds, ensuring your plans are legal and appropriate relating to food and beverages and other expenses. Do not accept compensated benefits offered by hotels and other venues. Please ensure that Interior representatives comply with the Department's guidance that limit the use of promotional items, and ensure all activities support mission-critical needs of the Department, bureau or office.

Each conference approval request must be approved by the appropriate bureau or office director and programmatic Assistant Secretary, prior to submission to PFM. Conference approval requests that have not been approved by the Assistant Secretary will be returned to the bureau or office for approval. Conference approval requests for offices that report to the Chief of Staff should be approved by the Chief of Staff or Deputy Chief of Staff before submission to PFM.

Any conference for which DOI bureaus or offices (individually or collectively) anticipate spending \$100,000 or more must be approved by the Deputy Secretary. The Deputy Secretary's review will be based on the line-by-line analysis developed by PFM and a recommendation by the DAS-BFPA.

Conferences Outside the Allowable Limits

Interior and its bureaus and offices are not to incur net expenses greater than \$500,000 from their own funds on a single conference, including conferences we host or sponsor and those hosted or sponsored by other Federal or non-Federal entities. If exceptional circumstances exist, the Secretary may provide a waiver from this policy based on the compelling purpose and exceptional circumstances of the conference.

Waivers will be considered by the Secretary if recommended by the Deputy Secretary and supported by the Solicitor. Bureaus or offices seeking a waiver from this policy must include the following in their conference approval package in addition to the items required in a conference approval package as described above in the section entitled *Conference Review and Approval Process*:

- The rationale for considering the conference in question as having exceptional circumstances and a compelling purpose;
- Demonstration that the conference is the most cost-effective option to meet mission needs; and
- The package should include the signature of the bureau/office chief acquisition officer who has validated that contracting actions for the conference are compliant with Federal Acquisition Regulations.

PFM will review each approval request package to ensure all appropriate elements have been considered and provide the request to the DAS - BFPA for approval, disapproval, or a request for a modification. Approvals for conferences that are estimated to cost in excess of \$100,000 will be presented to the Deputy Secretary for a line-by-line review. Disputed conference approvals/disapprovals will be elevated to the Deputy Secretary for resolution. PFM will communicate the determination to the conference POC.

Conference Expense Components

M-12-12 defines conference expenses as “all direct and indirect conference costs paid by the Government, whether paid directly by agencies or reimbursed by agencies to travelers or others associated with the conference, but do not include funds paid under Federal grants to grantees. Conference expenses include any associated authorized travel and per diem expenses, hire of rooms for official business, audiovisual use, light refreshments, registration fees, ground transportation, and other expenses as defined by Federal Travel Regulations.”

DOI Offices and bureaus should use this definition, which is based on 41 CFR 301-74.2 when determining conference costs. Specifically, offices and bureaus should include the following costs:

- Authorized travel and per diem expenses;
- Hire of rooms for official business;
- Audiovisual and other equipment usage;
- Computer and telephone access fees;
- Food and beverages;

- Printing;
- Registration fees
- Speakers travel and fees; and
- Ground transportation.

Employee time/salary at the conference and on en route travel should not be included. In addition, Federal employee time for conference preparation should not be included. Conference preparation and planning expenses (excluding Federal employee time) should be included, for example any contracted support for conference preparation.

Website Requirements

The PFM website includes all conference guidance at <http://www.doi.gov/pfm/policy.html>. The checklist and other related materials are posted for ease of use.

Beginning January 31, 2013, PFM will post on the DOI website, descriptions of all conference activities of the previous fiscal year exceeding \$100,000 (net of any proceeds collected). The descriptions of the conference activities that will be posted to the website will include:

- The total conference expenses incurred by DOI for the conference;
- The location (facility, city, and state) of the conference;
- The date of the conference;
- A brief explanation how the conference advanced the mission of the agency; and
- The total number of individuals whose travel expenses or other conference expenses were paid by the agency.

In addition, the website will include the Secretary's documented approval for any conference activities exceeding \$500,000. Finally, the website will also include information about DOI's net conference expenses for the fiscal year. In order to be aware of information that should not be posted as described, please notify us if the information is considered to be sensitive, prohibited from public disclosure by statute or regulation, or may jeopardize national security or the health, safety or security of conference attendees, organizers or others.

Conference Activity Monitoring

To comply with the OMB conference monitoring requirements, PFM will analyze travel data available in GovTrip. To ensure that the analysis performed is accurate, it is critically important that each bureau and office management instruct employees to designate "conference attendance" or "large conference of 30 or more" for their "Trip Purpose" in GovTrip whenever the purpose of travel is to attend a conference. This includes attendance at DOI-sponsored conferences as well as any conference not hosted by a DOI bureau or office. We appreciate your help issuing this guidance to your employees, as the Department will continue to use this data to monitor conference attendance. We will be sharing the results of our data analysis in the coming weeks to assist you in your conference management.

Internal Control Reviews

All bureau and office directors must certify in their assurance statements that effective internal controls, policies, and procedures are in place to monitor conference activities and spending.

Because of the high level of sensitivity and risk associated with conference travel, we will continue to ask each bureau or office to conduct an assessment of the effectiveness of internal controls surrounding the conference approval process, in their annual internal control reviews.

Thank you for your continued assistance with this requirement. PFM will continue to be the central point of coordination for annual conference plans, requests for conference approvals, internal control reviews, and analyzing available data. If you have any questions about this request, please contact Douglas Glenn, Scott Mabry or Patrick McHugh at (202) 208-4246.

Attachments

cc:

Bureau Chiefs of Staff

Bureau Procurement Chiefs

Bureau Internal Control Coordinators

Bureau Budget Officers

Director, Office of Acquisition and Property Management

Director, Office of Budget

Instructions for Annual Reports of Conference-Related Activities

An annual reporting of anticipated conference activities and spending should not include formal classroom training activities (typically attended by less than 30 people). Conferences should be distinguished from training as follows:

1. A conference is a meeting, retreat, seminar, symposium or event that requires a majority of attendees to travel away from their duty station and be placed in an authorized per diem status. This includes senior bureau leadership meetings and meetings of specific disciplines or initiatives, for example, acquisition, planning, youth, etc. Conference approvals from the Deputy Secretary- this is delegated to PMB's DAS-BFPA- are required for conferences of 30 or more people, with one-half (15 or more) in travel status. Approvals are also required when bureaus/offices plan to send 15 or more bureau/office employees to an event hosted by another entity.
2. A conference can involve topical matters of interest to participants, and can be bureau-specific or could include participation of multiple agencies and/or non-governmental participants. Indicators of a conference include registration, an agenda, discussion and break-out sessions, and scheduled speakers or discussion panels.
3. Training typically involves the process of providing for, and making available to, an employee, and placing or enrolling the employee in a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields which will improve individual and organizational performance and assist in achieving the agency's mission and performance goals. Formal classroom training, including training at OPM facilities or any of the DOI facilities, is not considered to be a conference.
4. Conferences that meet the definition of training in 5 CFR 410.404 ARE covered by this policy. This includes conferences when:
 - The announced purpose of the conference is educational or instructional;
 - More than half of the time is scheduled for a planned, organized exchange of information between presenters and audience members that meets the definition of training in Section 4101 of Title 5, U.S.C.;
 - The content of the conference is germane to improving individual and/or organization performance; and
 - Individual developmental benefits will be derived through the employee's attendance.
5. Please see the following page for the desired format and fields for Annual Conference Plans.

Checklist for Evaluation of Proposed Conference

Bureau(s) / Office(s) Participating: Lead and Others to Participate:	Lead Bureau	Other Bureau	Lead Office	Other Office
Name and Contact Information of Conference Planner:	Contact Name	Contact Email	Contact Phone	
Conference Title/Subject:				
Purpose/Objective (Please submit conference agenda or other conference material):				
Date(s) and Location:				
How is this conference listed in your annual plan?				
Estimated Number of Participants:				
Estimated Cost (Conference; Related Travel; Other; and Total): Report the totals here and attach an agenda, a listing of travelers, place of origin/duty station, travel costs for each, and per diem.	Conference cost	Travel Cost	Other cost	Total Cost

Attendance Review Checklist

1.	Have attendees recently attended similar conferences? Note redundancy vs. supplementary / complimentary event.	Yes	No	Comments on Similar Conferences
2.	Have the appropriate attendees been selected? (number and categories)	Yes	No	Comments
3.	Has analysis been done to determine cost effectiveness of conference location?	Yes	No	Comments
3a.	Is fee appropriate for conference location?	Yes	No	Comments
3b.	Were alternative conference locations considered? Include cost comparison with at least three alternative locations considered if available (Provide Cost Analysis). Was least costly location selected? If not, provide rationale for rejecting less costly alternatives. Note: Not applicable to external hosted conferences.	Yes	No	Comments
3c.	Was a Government facility selected or considered for host location? If no, document reason not selected. Note: Not applicable to external hosted conferences.	Yes	No	Comments

4.	Was the use of video-conferencing technology considered for this conference?	Yes	No	Comments
5.	Is the location within allowable per diem limits?	Yes	No	Comments
5a.	If not, have all requirements to authorize the conference lodging allowance been completed?	Yes	No	Comments
6.	Is the length of conference appropriate?	Yes	No	Comments
7.	Will meals be provided at conference? If so provide details and justification.	Yes	No	Comments
7a.	Have appropriate procedures to decrease per diem for provided meals been put in place?	Yes	No	Comments
8.	Is a meeting/event planner to be used; at what cost? Was review completed to ensure planner does not receive kick-back?	Yes	No	Comments
9.	Are the fees paid to speakers appropriate? Are speakers appropriate for objective of conference? Were credentials verified and suitability checked? Please provide a list of speaker's fees.	Yes	No	Comments

Bureau Reviewer Name			Bureau Reviewer Signature			Date		
Assistant Secretary Name			Assistant Secretary Signature			Date		
PFM Reviewer Name			PFM Reviewer Signature			Date		
PFM Reviewer's Conclusion (Recommend Approval, Disapproval, or Other Action by Deputy Assistant Secretary-BFPA)								
Deputy Assistant Secretary-BPFA Approval Signature (under \$100,000)			Deputy Assistant Secretary-BPFA Disapproval Signature			Date		
Deputy Secretary Approval Signature (over \$100,000)			Deputy Secretary Disapproval Signature			Date		