



# United States Department of the Interior

OFFICE OF THE SECRETARY

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FINANCIAL MANAGEMENT MEMORANDUM 2013-024 (Vol. VI.B.)

To: Assistant Secretaries  
Heads of Bureaus and Offices  
Bureau Chief Financial Officers

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Subject: Authorization and Reporting Guidance on Conference-Related Activities and Spending

The purpose of this Financial Management Memorandum (FMM) is to update all previous guidance to incorporate recent changes in reporting conference spending. The Consolidated and Further Continuing Appropriations Act, 2013, requires additional reporting and strengthens existing limitations found in Office of Management and Budget (OMB) memorandum M-12-12. Specifically, annual reports on large conferences and summary reports on conference spending over \$20,000 will be submitted to the Department of the Interior (DOI) Office of Inspector General. Detailed reports (i.e., approval packages) will continue to include information on conference purpose, estimated cost, and attendance, but based on the statutory requirements will also include information that is responsive to new requirements to report descriptions of contracting procedures. There are also new requirements to ensure that spending authority is strictly limited to costs directly and programmatically related to the purpose for which a grant or contract was awarded (as opposed to subsidizing conferences or sponsorships). This memo supersedes FMM 2013-013, *Guidance on Conference-Related Activities and Spending*, dated January 15, 2013.

1. **General.** This memorandum provides guidance on the management of conference activities and spending for DOI that is effective immediately. This guidance is consistent with the Consolidated and Further Continuing Appropriations Act, 2013; the President's Campaign to Cut Waste, Executive Order 13589 – *Promoting Efficient Spending*; and OMB memorandums M-11-35 and M-12-12. Following this guidance promotes a strong framework of internal controls designed to mitigate risks associated with conference planning and spending, and ensure compliance with Federal Travel Regulations.

2. **Duties.**

A. Bureau and Office Directors, Assistant Secretaries, the Deputy Secretary. Bureau and Office Directors, Assistant Secretaries, the Deputy Secretary and other approvers and reviewers are to: maintain a set of processes and internal controls that ensure all conference related activities are directly in support of the organization's mission; provide scrutiny to ensure that conference hosting, sponsorship, attendance, and expenses are directly and programmatically

related to their purpose and limited to only the levels required to carry out the goals of the conference; and assure that there has been consideration of alternative means to achieve mission goals as efficiently as possible.

- B. Deputy Secretary. The Deputy Secretary conducts line-by-line reviews of conferences with estimated costs of \$100,000 or more to ensure the necessity of the conference activities, compliance with the overall spirit of the policy to minimize conference related spending, and 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. In addition, the Deputy Secretary reviews and approves spending on conference sponsorship and corporate membership related to conference activity.
- C. Assistant Secretary - Policy, Management and Budget. The following authority cannot be delegated below the Deputy Assistant Secretary - Budget, Finance, Performance and Acquisition (DAS-BFPA) level.
  - 1. Authorization and approval of Government hosting of a conference involving attendance of 30 or more Federal employees or invitational travelers when 15 or more are traveling and total net cost is less than \$100,000. Reimbursements from other Federal entities should not be deducted from the total conference cost when deriving a net expense amount.
  - 2. Authorization and approval of attendance to externally hosted (non-DOI sponsored) conferences involving 15 or more Federal employees or invitational travelers when total net cost is less than \$100,000. Reimbursements from other Federal entities should not be deducted from the total conference cost when deriving a net expense amount.
- D. Deputy Assistant Secretary- Budget, Finance, Performance and Acquisition. The DAS-BFPA is the senior career official responsible for oversight and implementation of these policies and approves/disapproves/modifies arrangements for conferences that are below the \$100,000 threshold and refers conferences of \$100,000 or more for the Deputy Secretary's action and, in very limited circumstances, the recommendation for a waiver for conferences estimated to cost \$500,000 or more.
- E. Office of Financial Management (PFM).
  - 1. The PFM is responsible for coordinating the conference approval process on behalf of the Department and provides an initial recommendation to the DAS-BFPA.
  - 2. The PFM is the liaison with OMB and provides direction and assistance to Assistant Secretaries, bureaus, and offices and conference coordinators in the implementation of these policies and procedures.
  - 3. The PFM will compile, transmit and post reports on conference activities and spending. Reports include the annual report of large conferences (estimated cost of \$100,000 or more) as well as reports on conference and sponsorship spending, and summary reports of all

conference attendance costing more than \$20,000 during fiscal year 2013.

- F. Conference Coordinator. Each bureau and office Director and Assistant Secretary will appoint a conference coordinator. The coordinator will manage conference approvals, maintain the annual conference plan, and act as a liaison between the bureau and the Department. Each bureau and office will prepare an annual conference plan. PFM will maintain an updated list of coordinators. To enhance the effectiveness of the conference approval process, the coordinator 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 and consult with travel experts regarding adherence to Federal Travel Regulations. The coordinator will be responsible for tracking conference activity and spending, submitting the annual plan and updates, ensuring that each conference approval package is complete, proper reviews are performed, and appropriate approvals are obtained.
- G. Inspector General. Will receive reports of conference activity that includes annual report of large conferences (estimated cost of \$100,000 or more) and summary reports of all conference attendance costing more than \$20,000.

### 3. [Reserved]

### 4. Conference Planning.

- A. Annual Conference Plans. Bureaus and offices are required to maintain an annual plan of anticipated conference activity for each fiscal year to promote planning and effective management of conferences.
1. The plan is to be submitted to PFM by October 31 and updated as plans change throughout the year.
  2. The annual plan will include all conferences that a bureau or office plans to host or sponsor for 30 or more individuals and where 15 or more of the individuals attending will be in travel status and all conferences estimated to cost \$20,000 or more regardless of attendance.
  3. The plan should also include conferences hosted by other entities at which 15 or more of bureau or office employees will be attending (regardless of travel status or cost).
  4. Plans will include, at a minimum, a description of the purpose, number of participants, estimated cost, and description of the contracting procedures used including:
    - a. whether contracts were awarded on a competitive basis; and
    - b. a discussion of any cost comparison conducted by the departmental component or office in evaluating potential contractors for the conference.
  5. The plan will be used to inform the Deputy Secretary, monitor conference approval requirements, and assist in developing Department-wide conference attendance plans.

6. The plan should not include formal classroom training activities. 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.
  7. The plan should not include consultation with Indian Tribes as these meetings are an organic requirement of the Department to seek input. Federal Conference Planning Guide. Conference planners must follow the Federal conference planning guide (Appendix E to Chapter 301 of the FTR) and DOI Temporary Duty Travel Policy. The FTR may be accessed at: <http://www.gsa.gov/portal/content/102886>.
- B. Federal or Government-Owned Facility. Bureaus and offices are to conduct conferences at a Federal or Government-owned facility. In instances when a bureau or office does not plan to use a Federal or Government-owned facility, the conference request package will include a justification. The failure to secure a Federal facility due to a lack of planning is not a sufficient rationale. Rather, bureaus and offices should demonstrate why a facility is not suitable. The following web site provides Federal agencies access to a catalog of conference and meeting facilities for hosting or sponsoring conferences:  
<http://fedmeetingspace.cfo.gov/>.
- C. Allowable Per Diem Rates. Bureaus and offices are to ensure that lodging and expenses are within allowable per diem rates.
- D. Sponsorships. Bureaus and offices are to ensure that sponsorships are approved in advance and conform to acquisition requirements. For the purpose of this policy, sponsorship includes expending funds for sponsoring, advertising, corporate membership, and all other support to a hosting organization. Bureaus are responsible for the clearance of all legal and ethical matters relating to sponsorships, cooperative agreements, and/or other issues with the Solicitor's Office and for review of contracting actions by the bureau/office acquisition official to ensure they are compliant with Federal Acquisition Regulations.
5. **Conference Review and Approval Process.** For all conferences a bureau or office hosts that involve 30 or more individuals where 15 or more are in travel status or for attendance at a conference hosted by another entity where 15 or more employees will be attending, your conference coordinator must submit a conference request to PFM at least two weeks prior to the conference start date. This is especially important for annual conferences or any conference with anticipated expenses of \$100,000 or more, which should be submitted at least 30 days in advance of the conference. Please ensure your timeframes for preparation and review allow sufficient time to take advantage of discounted registration fees and discounted room rates, and to avoid cancelation penalties. Untimely conference approval requests and failure to take advantage of discounts demonstrates a lack of adequate conference planning.

- A. Approval Package. To ensure all appropriate factors are considered in planning a conference, each approval request should contain the items listed below.

Worksheets and checklists are available at the PFM website (<http://www.doi.gov/pfm/policy.cfm>).

- 1) An agenda for the meeting;
- 2) A multiple city cost analysis worksheet;
- 3) A conference attendee cost worksheet;
- 4) A completed Checklist for Evaluation of Proposed Conference, which is the primary tool used to evaluate conference plan requests;
- 5) Waivers for prohibited expenses;
- 6) Written justification if using non-Federal facilities; and
- 7) Documentation that sponsorships have been approved by the Deputy Secretary.

- B. Approval Process. Each conference request must be approved by the appropriate bureau or office director and programmatic Assistant Secretary prior to submission to PFM. Conference 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.

- C. Lodging Above Allowable Per Diem Rates. Planned conferences with lodging over allowable per diem rates will be disallowed unless adequate justification is provided. The lack of planning to secure lodging that is within per diem rates and the selection of hotels by the sponsoring entity do not justify exceeding per diem rates. If the hosting organization selects a venue that exceeds per diem rates, bureaus and offices are to find alternative lodging. Exceptions may be made in cases where there is no adequate alternative lodging or the costs of transportation to and from the venue exceed per diem.

## **6. Conference Spending.**

- A. Limitation on Conference Costs. Collectively, Interior and its bureaus and offices are not to incur net expenses greater than \$500,000 on a single conference, including conferences we host or sponsor and those hosted or sponsored by other entities. Reimbursements from other Federal entities should not be deducted from the total conference cost when deriving a net expense amount.

- 1) If exceptional circumstances exist, the Secretary may provide a waiver from this policy based on the compelling purpose and unique circumstances of the conference in question. A case must be made for the cost-effectiveness of the conference relative to alternative ways to achieve the mission-related benefits.
- 2) A waiver request must be received one month prior to the proposed conference or prior to the obligation of funds for the conference including securing services for planning the conference or securing a venue. The request should include:
  - a) The rationale for considering the conference in question as having exceptional circumstances and compelling purpose;

- b) Demonstration that the conference is the most cost-effective option to meet mission needs; and
- c) The signature of the bureau/office chief acquisition officer who has validated that contracting actions for the conference are compliant with Federal Acquisition Regulations.

B. Gross Conference Expenses. Gross conference expenses include 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. Conference expenses include any associated costs authorized by 41 CFR 301-74.2 including:

- 1) Travel and per diem expenses;
- 2) Hire of rooms for official business;
- 3) Audiovisual use;
- 4) Light refreshments;
- 5) Registration fees;
- 6) Ground transportation, and
- 7) Other expenses as defined by Federal Travel Regulations including, but not limited to:
  - a) Preparation and planning expenses;
  - b) Sponsorships;
  - c) Advertising;
  - d) Conference set-up; and
  - e) Speaker fees.

C. Conference-Related Expenses.

- 1) Per Diem. Employees or invitational travelers may not incur lodging costs that exceed the General Services Administration maximum lodging per diem.
  - a) This prohibition applies to conferences hosted, co-hosted, sponsored or co-sponsored by DOI bureaus and conferences hosted by any other Federal or non-Federal organization.
  - b) Exceptions will be considered when bureau or office directors and Assistant Secretaries document that exceeding the maximum lodging per diem is in the best interest of the Government.
- 2) Sponsorship. Committing funds for conference sponsorship, membership, support, or advertising requires approval by the Deputy Secretary in advance of the obligation of funds. This requirement applies to all conferences and is not limited to conferences of 30 or more people or attended by 15 or more employees. Proper acquisition procedures must be followed.
  - a) Sponsorship is defined as a cash and/or in-kind fee paid to an entity in return for access to conference or meeting benefits not provided otherwise. While the sponsoree (entity being sponsored) may be nonprofit, unlike philanthropy, sponsorship is done with the expectation of a return of increased awareness, additional

attendance, display of a bureau logo, participation in special events, etc.

- b) Sponsorships should be funded based on the following criteria:
  - i. The sponsorship contributes materially to the mission of the Department and/or bureau and advances a specific initiative, priority or program;
  - ii. The sponsorship does not imply or commit the Department and/or the bureau to costs for travel, per diem, lodging above the government rate;
  - iii. The sponsorship provides benefits that are not realized with the attendance of Departmental and/or bureau employees at the conference; and
  - iv. The sponsorship supports cooperative efforts and/or partnerships with other Federal agencies, states, Tribes, and non-Governmental entities.
  - v. The sponsorship complies with Federal acquisition requirements.
- c) Requests for sponsorships must include:
  - i. The name, date and location of the conference;
  - ii. The amount of the sponsorship;
  - iii. The benefits and/or services provided with the sponsorship (e.g., free attendance by some number of attendees, logo posted on the website, meals, etc.);
  - iv. The sponsoring entity's identity;
  - v. The funding source; and
  - vi. A narrative demonstrating why sponsorship is consistent with the purpose of the appropriation and in the best interest of the Department and the taxpayers. It should include the history of sponsorship with this entity.

## **7. Conference Reporting.**

- A. Posting of Conferences in Excess of \$100,000. Interior is to report publicly all conferences that are in excess of \$100,000 on a dedicated place on the official Interior website. Bureaus and offices may provide a link on their websites to the DOI website. The PFM will coordinate the compilation of conference information and post it as a link on the PFM website at <http://www.doi.gov/pfm/policy.cfm>. This report is also to be submitted to the Inspector General.
- B. Waivers and Net Conference Spending. The website is also to include information on waivers issued and net conference spending for the fiscal year. 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:
  - 1) Total expenses;
  - 2) Location;
  - 3) Date(s);
  - 4) How the conference advanced the Department's mission; and

- 5) The total number of individuals whose travel expenses or other conference expenses were paid by Interior, its bureaus, or its offices.
- C. Details of all conference activities costing more than \$20,000 shall be submitted to the Inspector General and PFM within 15 days of the date of a conference. This summary report will include the full name of the conference, the date, location, and number of employees attending. Bureaus are encouraged to use the annual plan as the reporting tool for this purpose, with additional reporting as necessary. Bureaus and offices are responsible for this reporting directly in order to ensure timely and complete reporting.

**8. Policies, Procedures, and Internal Control Reviews.**

- A. In order to support our assurances that the Department and its bureaus and offices are managing conference activities prudently and 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.
- B. Because of the high level of sensitivity and risk associated with conference travel, we will continue to ask each bureau or office to assess the effectiveness of internal controls surrounding the conference approval process, in their annual internal control reviews.

**9. Reference Material and Guidance.** The PFM website includes all conference guidance at <http://www.doi.gov/pfm/policy.cfm>. The checklist, templates for an annual plan, and other related materials are posted for ease of use.