



Conference Policy

Department of Commerce

September 2016

REVISION NUMBER	DATE	DESCRIPTION
1	7/8/2014	REWORDING OF CONFERENCE INDICATORS (II) OF CONFERENCE DEFINITION
2	9/12/2014	REVISED SYNOPSIS TEMPLATE
3	12/28/2015	UPDATED APPROPRIATIONS LANGUAGE
4	4/12/2016	REVISED SUBMISSION REQUIREMENT FOR CONFERENCE PRE-APPROVAL PACKAGES OVER \$500,000
5	7/8/2016	UPDATED DEFINITIONS CLARIFYING THAT FUNDS PROVIDED TO A NON-FEDERAL ENTITY PURSUANT TO BOTH GRANTS AND COOPERATIVE AGREEMENTS ARE NOT INCLUDED IN THE DEFINITION OF CONFERENCE

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Section 1 - Purpose

Conferences play a vital role in the Department of Commerce (DOC) mission. This document provides the Department guidance on conference approval and reporting. It further ensures that the Department is compliant with all Office of Management and Budget (OMB) memorandums and other authorities and guidance regarding conferences and that fiscal prudence is being exercised appropriately.

Subsection 1.1 – Authorities and Guidance

- [OMB Memorandum 11-35, "Eliminating Excess Conference Spending and Promoting Efficiency in Government," September 21, 2011](#) - requires departments to conduct a thorough review of the policies and controls associated with conference-related activities and expenses.
- [OMB Memorandum 12-12, "Promoting Efficient Spending to Support Agency Operations" May 11, 2012](#) - requires Deputy Secretaries (or their equivalents) to review planned conference spending where net expenses are \$100,000 or greater.
- [GSA Bulletin FTR 14-02, December 13, 2013](#) - clarifies the term "conference" as defined by the FTR and for the purpose of reporting requirements.
- [Consolidated Appropriations Act, 2016](#) – Title V, Sec. 526 states none of the funds made available in this Act may be used to send or otherwise pay for the attendance of more than 50 employees from a Federal department or agency at any single conference occurring outside the United States unless such conference is a law enforcement training or operational conference for law enforcement personnel and the majority of Federal employees in attendance are law enforcement personnel stationed outside the United States.
- [Consolidated Appropriations Act, 2016](#) – Division E, Title VII, Sec. 739(a) requires submission of annual reports to the Inspector General regarding the costs and contracting procedures related to each conference held by an agency during fiscal year 2016, for which the cost was more than \$100,000, and (c) within 15 days of the date of a conference for which the cost was more than \$20,000.
- [FTR Part §301-74, Conference Planning](#) - GSA conference planning Q&A.

Subsection 1.2 - Definitions (in alphabetical order)

Attended: A conference hosted by an entity other than DOC to which DOC employees are invited to participate. DOC has no formal role in the establishment or management of the conference.

Co-Hosted: A joint effort between DOC and another entity, public or private, to conduct a conference which is of benefit to each entity. It is evidenced by execution of a Memorandum of Understanding (MOU) setting forth the purpose, responsibilities, and basis of the joint effort.

Conference: The function is a meeting, retreat, seminar, symposium or event that involves federally funded attendee travel (non-local).

Further defined, if an event satisfies **all** of the criteria in i) through v) below, the event is a conference.

- i. The function is a meeting, retreat, seminar, symposium or event that involves federally funded attendee travel (non-local) **AND**
- ii. The event is sponsored/co-sponsored by anyone **AND**
- iii. The Agency will expend funds, including travel **AND**
- iv. Brings together a group of government employees¹ **AND**
- v. Includes two or more of the following “conference” indicators:
 - a) The event has a brochure
 - b) The event has a published/distributed agenda
 - c) The event is marketed internally **or** externally
 - d) Attendees register for it
 - e) Is a widely gathered event.²

Note: Federal Advisory Committee Act (FACA) meetings are **not** included in the definition of a “Conference.” Additionally, the definition of “Conference” does **not** include functions hosted by non-federal entities through the support of Department of Commerce financial assistance awards, including grants and cooperative agreements. Conferences hosted by non-federal entities pursuant to financial assistance awards are subject to the pre-award review processes and post-award monitoring standards associated with a specific financial assistance award.

Co-Sponsored: An agency must have substantial involvement in the planning and execution of the conference in order to be promoted or advertised as a co-sponsor. If an agency merely provides funds under a contract to an organization, part or all of which is for the purpose of putting on a conference without the substantial involvement of the agency, this guidance does not apply, even if the agency is listed as a supporter (such a listing should not be prominent).

Conference expenses: 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. This includes any associated authorized travel (excluding local travel) and per diem expenses, hire of rooms for official business, audiovisual use,

¹ If the attendance of government employees is incidental to the purpose of the meeting, (i.e., government employees staff the meeting (to work the registration table or to give a speech or lecture) but federal employees do **not** participate in conference events or activities, then the event would not be a conference. A meeting, at which both federal employees and non-federal attendees attend speeches, lectures, break-out sessions, etc., would be considered a conference.

² Widely gathered refers to widely gathered from different organizational units from within a sub-operating unit, organizational units from within a bureau, department and/or other organizations, federal and/or non-federal OR widely gathered can refer to widely gathered from different geographic locations.

meals, light refreshments, registration fees, ground transportation, and other expenses as defined by FTR.

For this purpose, the definition of “Conference expenses:”

- Do **not** include Federal employee time for conference preparation or attendance;
- Do **not** include funds paid to non-federal entities pursuant to a financial assistance award, including a grant or cooperative agreement;
- Do **not** include costs to ensure the safety of attending government officials; and
- Do **not** include costs for security/protective details.

Funds: The term “funds” as used herein, refers to all funds, both appropriated and non-appropriated.

Gross Cost: Total costs of an event including reimbursements from fees or from third parties. This includes 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. It does not include funds paid to non-federal entities pursuant to financial assistance awards (grants or cooperative agreements), or costs paid by hosts of attended only events. Gross costs can include:

- Any associated authorized travel and per diem expenses
- Hire of rooms for official business
- Audiovisual use
- Light refreshments
- Registration fees
- Ground transportation

Hosted: A conference in which DOC has control of most aspects of the conference. In some circumstances, DOC will employ a contractor as an “event planner” to manage the logistics of the event but the contractor is not considered a “co-host.” These include conferences that are statutorily or legally mandated for DOC to conduct. The word “held” is interchangeably used for hosted.

Mission: GSA Bulletin FTR 14-02, section 3, states “if the purpose of the travel falls under ‘mission’ as defined in FTR Chapter 301, Appendix C, then agencies WOULD NOT be required to report the travel per OMB Memo 12-12.” Therefore, travel to a particular site in order to perform operational or managerial activities, travel to attend a meeting to discuss general agency operations, review status reports, or discuss topics of general interest are not included in the definition of a conference for the Department.

Net Cost: Total costs of an event minus any reimbursements from fees or from third parties. This includes all direct and indirect conference costs paid by the Department, minus costs paid by other agencies or reimbursed by agencies to travelers or others associated with the conference. It does not include funds paid to non-federal entities pursuant to financial assistance awards (grants or cooperative agreements). Net costs can include:

- Any associated authorized travel and per diem expenses
- Hire of rooms for official business
- Audiovisual use
- Light refreshments
- Registration fees
- Ground transportation

Sponsored: A conference in which DOC is not involved in the planning or operation of the conference, but DOC officials determine that the benefits of the conference are closely related to the mission of DOC. DOC's sole participation is to provide financial support, not including support provided to a non-federal entity through a financial assistance award (grant or cooperative agreement).

Training: 5 USC 4101(4) states that "training" means 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. The term "conference" may also apply to training activities that are considered to be conferences under 5 CFR 410.404, which states that "agencies may sponsor an employee's attendance at a conference as a developmental assignment under section 4110 of title 5, United States Code" 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;
- The content of the conference is germane to improving individual and/or organizational performance, and
- Developmental benefits will be derived through the employee's attendance.

Waiver: The agency head's approval in writing that identifies the exceptional circumstances which necessitate exceeding the \$500,000 threshold of net expenses for an agency-sponsored or co-sponsored conference.

Section 2 – General Policy

Subsection 2.1 – Responsibilities

The Secretary and Deputy Secretary of Commerce are responsible for policy and oversight of all DOC conference-related activities. The Office of Financial Management's (OFM) Office of Administrative Programs (OAP) manage DOC's conference policies and controls for conferences hosted/co-hosted or sponsored/co-sponsored by the Department and attended by Department employees through Bureau reporting, pre-approval thresholds and the internal approval process.

The heads of the Bureaus are responsible for ensuring the Department’s policy is upheld and internal policy and controls are developed to support a well-managed conference program. In addition, conference packages submitted to the Department for pre-approval must first be approved by the Deputy Under Secretary and Bureau Chief of Staff (or their equivalent in the absence of a Deputy Under Secretary and/or Chief of Staff within the bureau) prior to submission to the Department.

Bureaus must not proceed with a conference or enter into any conference-related contracts until approval has been authorized. Bureaus who are co-hosting or co-sponsoring an event must first consult with the Department Office of the General Counsel (OGC), General Law Division to ensure a proper Memorandum of Understanding (MOU) is in place.

Subsection 2.2 – Conference Approval Authority

Threshold Value	DOC HELD or ATTENDED
>\$500K (<i>Net</i>) <i>Note: Waiver required</i>	Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.1)
>\$500K (<i>Gross</i>)	Deputy Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.1)
\$100K-\$499K (<i>Net</i>)	Deputy Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.1)
\$20K-\$99K (<i>Net</i>)	As Specified by Bureau Internal Policy (see Subsection 2.4.3)
<\$20K	As Specified by Bureau Internal Policy (see Subsection 2.4.3)
Optics (<i>Any Cost</i>)	Deputy Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.4.4)

Subsection 2.3 – Pre-Approval Process

Bureaus must notify OAP as early as possible but no less than 90 days prior to any upcoming conference event requiring pre-approval by the Deputy Secretary or Secretary. Once the initial information (conference title and start/end dates) is received, the OAP Conference Program Manager will send the Bureau point of contact a Cost Estimate Workbook. This workbook should be filled out and included as part of the complete pre-approval package. No later than 30 business days prior to the conference start date and/or before the approval is required, a complete pre-approval package must be submitted to

OAP. Conferences above \$500,000 that require a waiver to be approved by the Secretary should be submitted no later than 45 business days before the approval is required. Bureaus must ensure the package is clear, concise, error free (no spelling or mathematical errors, dollar amounts on all documentation are accurate), and appropriate Bureau-level approvals are attached. A complete conference pre-approval package consists of the following ([see Appendix A](#)):

1. Bureau Management Approval memo
2. Conference Synopsis
3. Cost Estimate Workbook

For conferences with net costs of \$100,000 or more, no contracts can be signed (or let) unless the Department has approved the event; however, the contracting process may proceed up to but not including award. MOU's can be submitted to OGC for conditional clearance while the conference is in the pre-approval stages.

Conference packages that are submitted less than 30 days from the start of the event must include an explanation for the reason of the late submission. This information should be included in the Bureau Management Approval Memo. Conference packages that are late or incomplete may not be approved in a timely manner and may require the requesting Bureau to cancel or reschedule the conference.

Subsection 2.4 – Thresholds

1. PRE-APPROVAL FOR GREATER THAN OR EQUAL TO

\$500,000 (NET): Per OMB Memorandum 12-12, agencies shall not incur net expenses in excess of \$500,000 on a single conference from its own funds, including conferences that are sponsored or hosted by the agency (or by other Federal or non-Federal entities). The agency head may provide a waiver from this policy if he or she determines that exceptional circumstances exist whereby spending in excess of \$500,000 on a single conference is the most cost-effective option to achieve a compelling purpose. The grounds for any such waiver must be documented in writing by the agency head. The Secretary is required to review and approve in advance each conference to be sponsored/co-sponsored, hosted/co-hosted, or attended that the Department's net conference expenses are estimated to exceed \$500,000.

The Bureau head must submit a waiver request with the conference pre-approval package that provides sufficient details about the conference, strong justification for the necessity of the event, and a description of how the conference furthers their mission. The waiver request must be approved by the appropriate Bureau Deputy Under Secretary and Chief of Staff and must contain space for the Secretary's signature of approval or disapproval.

2. PRE-APPROVAL FOR GREATER THAN OR EQUAL TO

\$100,000 (NET) AND/OR \$500,000 (GROSS): The Deputy Secretary is required to review and approve in advance, each conference to be sponsored/co-sponsored, hosted/co-hosted, or attended for which the

Department's net conference expenses are estimated to equal or exceed \$100,000 net or gross conference expenses estimated to equal or exceed \$500,000.

3. PRE-APPROVAL FOR LESS THAN \$100,000 (NET): Bureau review and pre-approval for each conference to be sponsored/co-sponsored, hosted/co-hosted, or attended whose net conference expenses are estimated to be less than \$100,000 is as specified by bureau internal policy. Bureaus must implement and uphold robust internal conference procedures to ensure conferences with net costs below \$100,000 are internally approved and appropriate conference files are maintained. Bureaus shall implement internal policies and practices to ensure consistency across the operating units for approval of conference requests from \$20,000 to less than \$100,000 thresholds.

4. PRE-APPROVAL FOR EVENTS LESS THAN \$100,000 (NET) THAT MAY ATTRACT PUBLIC ATTENTION: Department review and pre-approval for conferences with net costs less than \$100,000 is required for any event that could have sensitivity or could attract public attention regardless of the amount of federal funds involved in the event ([see Subsection 3.5](#)).

5. COST VARIANCES NOTIFICATION AND POST APPROVAL PROCESSES: Post-approval from the Department is required for any conference that originally was not estimated to exceed the \$100,000 or \$500,000 threshold, but actual costs resulted in the conference exceeding the threshold. Likewise, substantial changes in pre-approved scope (date, location) must be brought to the attention of the Department prior to the start date of the conference and/or as soon as identified.

Subsection 2.5 – Conference Exemption Request

GSA Bulletin FTR 14-02, section 3, states “if the purpose of the travel falls under ‘mission’ as defined in FTR Chapter 301, Appendix C, then agencies WOULD NOT be required to report the travel per OMB Memorandum 12-12.” Therefore, travel to a particular site in order to perform operational or managerial activities, travel to attend a meeting to discuss general agency operations, review status reports, or discuss topics of general interest are not included in the definition of a conference for the Department.

Examples:

- Employee's day-to-day operational or managerial activities as defined by the agency, to include, but not be limited to: hearings, site visits, informational meetings, inspections, audits, investigations, and examinations.
- Agency has an inherent mission to facilitate interactions and relationship building between businesses and other private sector entities, domestically and internationally for the purpose of promoting exports and trade, such as International Buyer Program events and trade missions, for which the sole purpose of the event is to facilitate business engagement between private entities to develop export opportunities.

A Bureau may submit a Conference Exemption Request ([see Appendix D](#)) if an event is mission related and meets the above-stated criteria. The exemption request must provide justification and supporting documentation for the exemption and will require annual approval by the Department CFO/ASA. Annual exemption requests ([see Subsection 4.2](#)) must be submitted by November 30 of the current fiscal year for all events for which exemptions will be requested for that fiscal year. Additionally, individual event exemption requests may be submitted no less than 45 days from the start of an event.

Section 3 – Use of Government Funds

Appropriated funds may be used to pay for a conference as long as the Department/Bureau determines that a formal conference is reasonably and logically related to carrying out its mission and that a face-to-face event is mission essential.

Bureaus and their operating units shall not use appropriated funds, fees, revenue or gifts associated with the conference to cover entertainment-related expenses, the cost of amenities or other unrelated/minimally related events. Examples of such expenses include motivational speakers, musicians or other entertainers, extraneous promotional items, decorations, or other goods and services for participants unrelated to the purpose of the conference including tickets to recreational activities outside of the conference setting.

When planning a conference, every effort must be made to minimize the cost of all aspects of the conference including the venue, conference planner, audiovisual, printing, and other expenses ([see Appendix C](#)). The number of government attendees shall be limited to the minimum number of employees necessary to achieve the mission and goals of the conference and be in compliance with all authorities and guidance.

Subsection 3.1 – Food and Refreshments

Appropriated funds may not be used to provide food and/or refreshments to conference attendees. Pursuant to 31 U.S.C. § 1345, appropriated funds may not be used to pay the subsistence expenses of non-Federal attendees at a conference. With respect to Federal attendees, food is considered a personal expense for which an employee is expected to bear the cost of from his or her own salary.

In certain instances, food and refreshments may be purchased using Gift and Bequest funds or Mutual Educational and Cultural Exchange Act (MECEA) funds. The Department's policies on use of such funds for food and refreshments are set forth in Department Administrative Orders 203-9 and 203-10. Questions should be referred to the Department's Office of the General Counsel, General Law Division.

In accordance with 41 C.F.R. 301-11.18, food may be provided to those on official travel; however, the traveler's per diem must be adjusted to account for the meal(s) furnished. Questions on this specific topic should be addressed to the Department's Office of the General Counsel, General Law Division (also see [OGC FAQ's](#)). Food purchased for meals should be negotiated with the hotel/venue to be as close as possible to the M&IE

rates for individual meals as set out by the FTR. Food and beverages for breaks shall be limited to coffee, tea, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips or muffins. Appropriated funds cannot be used to purchase alcohol. Exceptions are Representation, Gifts and Bequest funds, or funds authorized under the MECEA.

The Department of Commerce Conference Planning Policies and Procedures incorporates by reference [Federal Travel Regulation §301-74 Conference Planning](#).

Subsection 3.2 – Contract Conference Planner

TRADITIONAL CONTRACT

Bureaus may contract with a conference planner through traditional methods where funds are obligated and paid to the contractor for its services. In keeping in line with reducing excessive conference spending, conference planner costs should be kept at a minimum. Bureaus and/or offices should work with their contracting officer to execute this type of contract once an event has been pre-approved by the Department/Bureau, as appropriate.

NO COST CONTRACT

A no-cost contract is a formal arrangement between a government entity and a vendor under which the government makes no monetary payment for the vendor's services. Under a typical no-cost contract, a vendor provides a service that an agency would otherwise perform, but instead of receiving compensation from the agency, the vendor charges and retains fees [assessed against third parties] for its services. If the contract is structured to allow the conference planner to do so, a conference planner may retain fees it receives from conference attendees for goods and services it provides to the attendees such as meals, lodging and refreshments, provided the attendee is not directed to pay the fee by the Department. The fee is called a “personal convenience fee” and is an expense the attendee is voluntarily paying in order to obtain services that the Department does not consider an integral part of the conference. The fee is collected by the contractor on his or her own behalf, not on behalf of the government. If there is an existing contract between the government and a conference planner, this component of the contract must be “no-cost.” Bureaus and/or offices should work with their contracting officer to execute this type of contract. The Department’s Office of the General Counsel, Contract Law Division, should also be consulted for guidance.

Subsection 3.3 – Collecting Attendance Fees

As a general rule, DOC cannot charge and retain attendance fees. The Federal government must have specific statutory authority to retain fees from outside sources. There is no Department-wide authority to retain fees; however, individual bureaus may have authorities specific to them which authorize them to collect and retain fees. For example, the International Trade Administration and the Bureau of Industry and Security have the MECEA. Contact the Office of the General Counsel, General Law Division, for more information.

To the extent that an attendance fee is charged without statutory authority, the fee would be considered a user fee under [31 U.S.C. § 9701](#) and would have to be deposited into the General Fund of the Treasury pursuant to the Miscellaneous Receipts Act [31 U.S.C. § 3302\(b\)](#). Questions on this topic should be addressed to the Department’s Office of the General Counsel, General Law Division.

Subsection 3.4 – Non-Federal Attendee Travel Restrictions

Absent specific statutory authority, the government is prohibited from paying the travel expenses of those attending meetings ([31 U.S.C. § 1345](#)). However, if an individual is providing a direct service to the Government (speaking at an event), the individual may be placed on invitational travel orders pursuant to [5 U.S.C. § 5703](#). In addition, a Bureau may have unique statutory authorities that authorize them to use their appropriated funds for travel and other expenses of non-federal employees. Any such authority must be specific (general training and technical assistance authority is not enough). Statutorily-required (rather than merely authorized) conferences may provide sufficient specificity. If a Bureau believes that it has such authority, it should consult with the Department's Office of the General Counsel, General Law Division, prior to relying on the authority.

Subsection 3.5 – Optics

Bureau leadership must ensure that government funds are used in such a manner that will not cause the public to scrutinize and/or portray the event in such a way that it would cause damage to the reputation of the Department or its bureaus.

Examples of issues that could be misconstrued by the public include:

- Events taking place at resorts or lavish locations;
- High individual attendee costs;
- Excessive costs for meeting planners;
- Expensive audiovisual or printing costs;
- Excessive/lavish food and/or alcohol;
- Any form of entertainment such as musicians, clowns, dinner/dancing events, golf tournaments; and
- Side excursions such as a tour of a city or a tour to a local tourist attraction.

Section 4 – Reporting

Subsection 4.1 – Annual Conference Plans

Annually by November 30, Bureaus should submit their annual plan of proposed conferences (hosted or attended) for the current fiscal year. It is important that the bureaus capture any planned conferences where the costs are expected to exceed \$100,000 net. Updates to the annual plan should be submitted on a quarterly basis.

Subsection 4.2 – Annual Exemption Requests

DOC will require annual exemption requests from Bureaus for events occurring during the year that do not meet the definition of a conference per GSA Bulletin FTR 14-02 (see [Subsection 2.5](#) and [Appendix D](#)). Annual exemption requests must be submitted by November 30 of the current fiscal year for any events occurring within the fiscal year. Updates or additional individual exemption requests for an event not submitted with the annual request may be submitted no later than 45 days from the start of the event. All requests must provide justification and appropriate supporting documentation. An event is exempt only once Department approval has been granted.

Subsection 4.3 – Annual Inspector General Report

In order to fulfill the reporting requirement of the [Consolidated Appropriations Act, 2014](#), Title VII, Sec. 742(a), on an annual basis, Executive Branch Departments are required to report to the Inspector General (IG), all conferences sponsored/co-sponsored or hosted/co-hosted, where the Government's actual net costs exceed \$100,000. The Department will collect this information quarterly and submit to the IG annually.

Within 30 days of the end of a quarter, the Bureaus will update the Cost Estimate Workbook for each pre-approved conference with actual expenses associated with that conference. To complete this step, the Bureaus shall update the actual cost columns based on any new information such as adjusting the number of participants that attended or the cost factors that went into the cost estimate. If final invoiced costs are not received by the time of reporting, Bureaus will ensure actual costs are reported to the Conference Program Manager as soon as practicable or upon request.

Subsection 4.4 – Bi-Monthly (15-day) Reports

Per the [Consolidated Appropriations Act, 2014](#), Title VII, Sec. 742(c), the Head of any Executive Branch Department holding (sponsored/co-sponsored or hosted/co-hosted) a conference must notify the Inspector General (IG) of the date, location, and number of employees attending a conference for which the net cost to the government was more than \$20,000. This notification shall occur within 15 days of the end date of the conference. In conjunction with the above guidance, Bureau conference points of contact must submit bi-monthly data to OAP on the [provided template](#). OAP will collect, compile, and report to the IG on the 1st and the 15th of every month.

Subsection 4.5 – Annual Website Report

In order to comply with the Departmental website conference reporting requirements of [OMB Memorandum 12-12](#), by January 31 of each year, actual cost data for conferences held with net costs \$100,000 or above are to be reported on the DOC website. OAP will collaborate with bureau CFOs regarding bureau submissions, including due dates and format of actual data. In addition, the website will include waivers identifying the exceptional circumstances for any instances where DOC net expenses for a conference exceeded \$500,000.

Section 5 – Internal Controls

Bureaus must implement and uphold an internal conference policy to ensure ALL conferences are internally approved and appropriate conference files are maintained. Additionally, Bureaus must include conference cost validations as an annual review in their internal A-123 process.

Subsection 5.1 – Annual A-123 Validation

An internal validation process should be implemented as part of the annual A-123 process to ensure conference spending is in line with OMB guidance. Bureaus should use the Testing Matrix ([see Appendix B](#)) template provided by the Department to assess the validity of conference expenses. An attestation memorandum ([see Appendix B](#)) must be submitted at the end of the fiscal year as confirmation that conference spending has been reviewed, verified and certified by a senior executive within the Bureau.

Subsection 5.2 – Department-Level Review

The Department will conduct periodic reviews and audits of Bureau validation reports and processes. Bureaus should be able to provide validated conference reports and supporting documentation within one week of the Department's request.

Section 6 – Training

The Department is developing training for annual completion by bureau conference POCs. The training should be finalized and online through the Commerce Learning Center by the end of FY 2014. The training will review the pre-approval process and thresholds, reporting requirements, and ensure POCs are knowledgeable on conference-related activities. The Department's Conference POC is available to assist during any stage of the process.

APPENDIX A – Pre-Approval Package Document Templates

MEMORANDUM FOR Ellen Herbst
Chief Financial Officer
and Assistant Secretary for Administration

FROM: [NAME]
[Bureau, Deputy Under-Secretary]
[NAME]
[Bureau, Chief of Staff]

SUBJECT: SUBJECT: [Bureau] Approval for [Conference title]

The purpose of [Conference Title] is to [describe the importance of the event and how it is critical to your mission and address/explain any/all potential optics that are a part of this event].

We approve [Conference Title] and confirm this event is mission critical.

Additionally, we certify to the Department that:

- conference expenses and activities comply with the Federal Travel Regulations (FTR) directives and executive branch policies on conferences as well as the Federal Acquisition Regulation (FAR) requirements on lodging, food and beverages, per diem reimbursement, and contracting of goods and services;
- no federal funds are used for unnecessary or inappropriate purposes;
- conference attendance and expenses are limited to only the levels required to carry out the mission of the conference; and
- conference attendance and expenses are in compliance with all applicable Appropriations Act language and with the Office and Management and Budget Memorandum 12-12 dated May 11, 2012, and other authorities and guidance.

If you have any questions, we are available to discuss at your convenience.

Attachments

This document should be Times New Roman, 12-point font, and single spaced.

Conference Synopsis Template

Bureau:	
Conference Title:	
Dates/Total Number of Days:	
Location/Venue:	
Number of DOC Attendees:	
Number of Other Federal Attendees:	
Number of Non-Federal Attendees:	
Total Number of Attendees:	
Net Cost to DOC:	
Gross Conference and Travel Costs:	
Transportation Costs (air, lodging, M&IE):	
Other Costs:	
Funded by:	
Procurement Method:	
Total Average Cost per Attendee:	

Description:

[This section should explain the purpose of the conference and how it is mission-centric]

Notes:

- [Explanation of optics that may draw public attention]
- [Explanation of all fees]
- [Explanation of other costs]
- [Explanation of procurement method]
- [Explanation of Per Diem rates/calculations, meals provided]
- [Explanation of sponsor/co-sponsorship and DOC OGC review compliance]
- [Explanation of historical data from past event (if conference is recurring) – i.e. number of attendees, cost differences]
- [Additional relevant information]



Department Of Commerce
Office of Administrative Programs
Conference Reporting

Bureau:	
Tracking Number:	2014-NOAA-00199
Updated:	4/15/2014 10:15

Conference Title

Point of Contact Name	POC Email
<input type="text"/>	<input type="text"/>

Alternate Email Addresses

Conference purpose

Mission Critical?

Funds Obligated?

Department of Commerce Participation

Co-sponsors

Location

Facility name

Federal facility

Start date	End date
<input type="text"/>	<input type="text"/>

Conference Days	Travel Days
<input type="text"/>	<input type="text"/>

Website

Bureau:	0
Tracking Number:	2014-NOAA-00199
Updated:	4/15/2014 10:15

Procedures/procurement method

Contracts awarded on competitive basis?

Cost comparison description

Costing methodology

	Estimated	Actual
Grant funding	\$0.00	\$0.00
IAA funding	\$0.00	\$0.00
Other funding	\$0.00	\$0.00
Total non-DOC funding	\$0.00	\$0.00

Other Funding Description

Reception?

Reception Description

Alcohol consumption?

Description of how alcohol will be funded

Special Events

Bureau:	0
Tracking Number:	2014-NOAA-00199
Updated:	4/15/2014 10:13

Attendees	Estimated	Actual
Department of Commerce Local	0	0
Department of Commerce Travelers	0	0
Invitational Travelers	0	0
Non-Department of Commerce	0	0
Non-Federal	0	0
Total attendees	0	0

Costs	Estimated	Actual
Transportation	\$0.00	\$0.00
Lodging	\$0.00	\$0.00
Meals and Incidental expenses (M&IE)	\$0.00	\$0.00

Food/Meals Provided		
Breakfast	\$0.00	\$0.00
Lunch	\$0.00	\$0.00
Dinner	\$0.00	\$0.00
Food subtotal <input type="checkbox"/> Deduct from M&IE	\$0.00	\$0.00

Other Costs (Must Be Explained in General Comments Section)		
Meeting space rental	\$0.00	\$0.00
Audio visual equipment and service	\$0.00	\$0.00
Conference planner	\$0.00	\$0.00
Trainer/instructor/facilitator	\$0.00	\$0.00
Interpreters	\$0.00	\$0.00
Registration fees	\$0.00	\$0.00
Printing/design work	\$0.00	\$0.00
Supplies and materials	\$0.00	\$0.00
Translation of materials	\$0.00	\$0.00
Visa/passport fees	\$0.00	\$0.00
Ground Transportation	\$0.00	\$0.00
Refreshments/Breaks	\$0.00	\$0.00
Receptions (food and/or alcohol)	\$0.00	\$0.00
Telephone/Fax/Internet	\$0.00	\$0.00
Evacuation Insurance	\$0.00	\$0.00
*Miscellaneous	\$0.00	\$0.00
Total conference costs	\$0.00	\$0.00
Net conference costs	\$0.00	\$0.00
Average Cost per attendee		

*Description of Miscellaneous costs

General Comments

APPENDIX B – COST VALIDATION DOCUMENT TEMPLATES

MEMORANDUM FOR Ellen Herbst
Chief Financial Officer
and Assistant Secretary for Administration

FROM: [NAME]
[Bureau, Title]

SUBJECT: [Bureau] Attestation for Quarterly Conference Validation

This memorandum is to attest to [Bureau's] quarterly validation of conference costs for Q[x], FY[xx]. As requested by the Department, [Bureau] staff [explanation of methodology used to validate conference costs]. We have focused on including our most costly events as well as our travel costs for the events included in our validation.

Our validation revealed [summary].

I attest to the completeness and accuracy of [Bureau's] conference costs as they are presented. Further, we have created and hold files of all supporting documentation in a central location. These files will be made available to the Department upon request. If you have any questions, I am available to discuss at your convenience.

Attachments

Title:
Engagement:
Date:

EXAMPLE

Validated by: <u>NAME</u> <u>DATE</u>
Reviewed by:

Purpose:

Source:

Scope:

Conclusion:

Item Number	Provided by the Client		EY		
#	Bureau	Conference Name	1.0 Compliance	2.0 Logistics	3.0 Travel
EXAMPLE	NOAA	Training Conference (Example)	No exceptions noted.	No exceptions noted.	Total Travel: No exceptions noted. Traveler Sample: For 1 of 2 travelers, the incorrect per diem rate was used. For 1 of 2 travelers, hotel receipts did not agree to the vouchered amount. For 1 of 2 travelers, amount reimbursed exceeded authorized amount. Authorization was not amended to reflect additional amount.

Tickmark Legend
N/A - Not Applicable
✓ - Yes
⋈ - data not reviewed
h - No
△ - Part of the overall total

EXAMPLE

Bureau Name: NOAA
 Conference Name: Training Conference
 Conference Date: 8/1/2012 - 8/03/2012

Validated by:	NAME	DATE
Reviewed by:		

1.0 Compliance					
1.1 Bureau Pre-Approvals	1.2 Department Pre-Approvals	1.3 (a) Market Research	1.3 (b) Justifications for Other than Federal Facility	1.4 Agreement	Notes
✓	N/A	✓	N/A	✓	No exceptions noted.

2.0 Conference Logistics Cost								
Vendor	Invoice Number	Description	2.2.1 Services Complete/Goods Delivered	2.2.3 Invoice Reviewed and Approved	2.2.2 Invoice Amount	2.3 Amount Paid	Variance	Notes
Vendor A	1	Audio Visual	✓	✓	\$ 1,000.00	\$ 1,000.00	\$ -	No exceptions noted.
Vendor B	2	Meeting Space	✓	✓	\$ 2,000.00	\$ 2,000.00	\$ -	No exceptions noted.
Vendor C	3	Refreshments	✓	✓	\$ 3,000.00	\$ 2,900.00	\$ 100.00	Vendor incorrectly invoiced the refreshments. \$2900 is correct amount. No exceptions noted.
2.4 Total Logistics Costs					\$ 6,000.00	\$ 5,900.00	\$ 100.00	
Reported Logistics Costs						\$ 6,500.00	-9%	Estimated amount reported; however, invoices were not available at time of reporting. Variance is not greater than 10% of original estimate. No exceptions noted.

3.2 Total Travel Costs			
3.1 Travel Amount from Bureau	3.2 Travel Amount from Reported	Variance	Notes
\$ 12,000.00	\$ 12,000.00	\$ -	No exceptions noted.

3.3 Individual Travel Costs						
Name of Traveler/Sample Number	3.3.1 Authorization Amount	3.3.2 Voucher Agrees to Receipts	3.3.3 Per Diem	3.3.4 Voucher Amount	Variance	Notes
1. A. Hogget	\$ 1,200.00	✓	h	\$ 1,150.00	\$ 50.00	Traveler used incorrect per diem rate.
2. E. Milner	\$ 1,250.00	h	✓	\$ 1,475.00	\$ (225.00)	Hotel receipts did not agree to the amount on the voucher. Also, amount reimbursed exceeded amount authorized. Authorization was not amended for the additional amount.

Tickmark Legend	
N/A	Not Applicable
✓	= Yes
-	= data not reviewed
h	= No
^	= Part of the overall total

APPENDIX C - Conference Planning Tools

Threshold Value	DOC HELD / ATTENDED	Pre-Approval Package Requirements	Reporting Requirements
>\$500K (<i>Net</i>) <i>Note: Waiver required</i>	Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.1)	Bureau Approval Memo Conference Synopsis Cost Estimate Workbook Waiver	Bi-monthly Report (Held Only) Annual IG Report (Held Only, Collected Quarterly) Annual Website Report (Held Only)
>\$500K (<i>Gross</i>)	Deputy Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.1)	Bureau Approval Memo Conference Synopsis Cost Estimate Workbook	
\$100K-\$499K (<i>Net</i>)	Deputy Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.1)	Bureau Approval Memo Conference Synopsis Cost Estimate Workbook	Bi-monthly Report (Held Only) Annual IG Report (Held Only, Collected Quarterly) Annual Website Report (Held Only)
\$20K-\$99K (<i>Net</i>)	As Specified by Bureau Internal Policy (see Subsection 2.4.3)	As Specified by Bureau Internal Policy (see Subsection 2.4.3)	Bi-monthly Report (Held Only)
<\$20K	As Specified by Bureau Internal Policy (see Subsection 2.4.3)	As Specified by Bureau Internal Policy (see Subsection 2.4.3)	
Optics (<i>Any Cost</i>)	Deputy Secretary of Commerce (Bureau Deputy Under Secretary and Chief of Staff, see Subsection 2.4.4)	Bureau Approval Memo Conference Synopsis Cost Estimate Workbook	

GSA Conference Planning Tools - The use of the following GSA conference planning tools is recommended for the planning of all conferences (there is no dollar threshold), as the tools simplify the planning process and produce the required documents to support the conference site selection:

- GSA’s “Group Travel Planning” tool; and
- GSA’s “FedRooms Groups and Meetings” tool.

The use of FedRooms properties is required to be considered in the selection process, but the results are not mandatory as other properties may offer better rates for conferences.

Facilities - When planning a conference to be sponsored or co-sponsored, or hosted or co-hosted by the Department, bureaus and Departmental offices must at a minimum:

- Maximize the use of Government-owned or Government-provided conference facilities as much as possible by reviewing the “[Federal Meeting Facilities](#)” report maintained on the GSA website which identifies Federal agencies that have conference and meeting space for agencies' use. Conducting business and hosting or sponsoring conferences in space controlled by the Federal Government is one way to reduce travel and related costs. This report provides the accommodation size and types of services available and includes cost categorizations of each Government conference facility into cost ranges (the lowest range is from [\$0 to \$50] and the highest range is [\$501 or higher]. Review the Federal Meeting Facilities report for a) cost; b) location, and c) availability for the conference.
- Utilize GSA’s free tool [GSA’s FedRooms Groups](#) that allows users to enter requirements and receive quotes from hotels for events. This tool enables conference planners to do market research efficiently.
- Avoid locations and accommodations that give the appearance of being lavish or are resort destinations;
- Consider and minimize all direct and indirect conference costs, including administrative costs; conference registration fees; conference attendees' travel costs, including the use of audio-video conferencing in lieu of travel when possible (this is strongly encouraged), and conference attendees' time cost. Per FTR, examples of such costs include:
 - Authorized travel and per diem expenses;
 - Hire of rooms for official business;
 - Audiovisual and other equipment usage;
 - Computer and telephone access fees;
 - Light refreshments;
 - Printing;
 - Registration fees;
 - Ground transportation;
 - Employees’ time at the conference and en route travel;

- When contracting for lodging, ensure that the conference lodging rate does not exceed the applicable locality lodging per diem rate;
- When reimbursing Departmental attendees for meal costs, ensure the cost of meals are within the prescribed per diem limits; and
- Ensure that Departmental attendees do not claim per diem for meals provided as part of the conference.

Conferences Sponsored or Hosted by Other Federal or non-Federal Entities - The decision to sponsor or co-sponsor, host or co-host, or attend a conference sponsored or hosted by other Federal or non-Federal entities requires fiscal prudence and is subject to the availability of funds from individual bureau appropriations or funds. The purpose of these policies and procedures is to ensure compliance with pertinent laws, regulations and requirements to ensure that conference spending is appropriately controlled and to ensure that proper controls are in place to mitigate the risk of inappropriate conference spending.

Conference Planning Checklist - Bureaus should use the Conference Planning Checklist to help ensure policies and procedures, pertinent laws, regulations and requirements are complied with, to ensure that conference spending is appropriately controlled, effective, and efficient, and proper controls are in place to mitigate the risk of inappropriate conference spending.

City-Pair Fares - GSA has created the City-Pair Fares with contract fares from/to cities throughout the world. Bureaus should estimate how many attendees will be coming from that section of the country. Using the city nearest the conference location, determine the cost of airfare by multiplying the estimated number of attendees by the applicable conference airfare.

Tools to Gather Estimates for Event Planning - GSA has two free tools to assist with gathering estimates for planning conference events.

- GSA's **FedRooms Groups and Meetings Tool** - This tool allows users to enter requirements and receive quotes from hotels for events. It provides an efficient approach for conference planners to do market research.
- GSA's **Federal Conference Facilities** - This list provides links to nationwide Federal conference facilities.

Conference Cost Validation – The Department has developed a **Testing Matrix** to assist Bureaus with validating the costs of their conferences. The test plan provides a template to be used to assess and evaluate the Bureaus internal controls and accuracy over conference cost reporting.

APPENDIX D - Conference Exemption Request template

MEMORANDUM FOR Ellen Herbst
Chief Financial Officer
and Assistant Secretary for Administration

FROM: [NAME]
[Bureau, Deputy Under Secretary]

[NAME]
[Bureau, Chief of Staff]

SUBJECT: [Bureau] Conference Exemption Request

Based on the guidance provided by the Department of Commerce Conference Policy dated May 2014, we request an exemption for the [Conference Title].

We believe the exemption is warranted because [Provide justification and reference appropriate sections of DOC conference policy. In addition, include as attachments any items that will support your request for an exemption.]

We request an exemption based on the information submitted at this time. We recognize that we must proceed with the standard pre-approval process until this exemption is approved. If the conference deviates from materials submitted in this memorandum, we will seek further approval from the Department.

