



January 22, 2015

MEMORANDUM

To: OPDIV and STAFFDIV Heads

From: Ellen G. Murray
Assistant Secretary for Financial Resources

Subject: HHS Policy on Promoting Efficient Spending: Use of Appropriated Funds for Conferences and Meeting Space, Food, Promotional Items, and Printing and Publications

The purposes of this memorandum are to remind the Department of Health and Human Services' (HHS) Operating and Staff Divisions of the following Policies on Promoting Efficient Spending and update the policy on Conferences and Meeting Space:

1. Use of Appropriated Funds for Conferences and Meeting Space – Updated and Reissued January 22, 2015
2. Use of Appropriated Funds for Food – Issued January 3, 2012
3. Use of Appropriated Funds for Promotional Items – Issued January 3, 2012
4. Use of Appropriated Funds for Printing and Publications – Issued January 3, 2012

These policies promote the Department's commitment to comply with appropriations law and to make sure that our dollars are being spent efficiently and wisely, and support the:

- Executive Order on Promoting Efficient Spending ([EO 13589](#));
- Executive Order on Delivering an Efficient, Effective, and Accountable Government ([EO 13576](#));
- Office of Management and Budget (OMB) Memorandum on Eliminating Excess Conference Spending and Promoting Efficiency in Government ([M-11-35](#)); and OMB Memorandum on Promoting Efficient Spending to Support Agency Operations ([M-12-12](#)).

These policy revisions are effective immediately and apply to all sources of funds (whether from an annual appropriation, multi-year appropriation, no year appropriation, appropriated user fee, mandatory appropriation, gift funds, or reimbursements from such appropriations, etc.), as well as non-appropriated funds, i.e., those set by law, etc.

Please share this transmittal memorandum and the attached policies with all appropriate officials within your OPDIV or STAFFDIV. Questions regarding this policy may be addressed to Clarence Randall, of the Office of Grants and Acquisition Policy and Accountability (OGAPA), at clarence.randall@hhs.gov.

HHS Policy on Use of Appropriated Funds for Conferences and Meeting Space

1.1 General

It is the Department of Health and Human Services' (HHS) policy that the conferences and meetings it funds are consistent with legal requirements and HHS's missions, objectives, and policies; represent an efficient and effective use of taxpayer funds; and be able to withstand public scrutiny. HHS's Operating Divisions (OPDIVs) and Staff Divisions (STAFFDIVs) must conduct business, including conferences and meetings, consistent with these tenets.

This policy supports and addresses [Executive Order 13589](#); [Executive Order 13576](#); [OMB Memorandum M-11-35](#); [OMB Memorandum M-12-12](#), and Sections 739 and 527 of the Consolidated and Further Continuing Appropriations Act, 2015, see Exhibit 1. Section 739 restricts the use of funds appropriated to HHS for travel and conference activities unless they are consistent with OMB Memorandum M-12-12, and thus, make it an Antideficiency Act (ADA) violation to use any HHS funds for travel and conferences that are inconsistent with this memorandum. Section 527 enables HHS to implement the approval thresholds called for under OMB M-12-12 at the OPDIV level, and provides that the information about scientific conferences be tabulated separately from and not included in agency totals. The impacts and implementation of Subsection 527(2), if any, will be made in a subsequent update to this policy. Therefore, scientific conferences must continue to be approved and reported in accordance with Sections 1.3 and 1.4 of this policy, respectively.

This policy is also in addition to the requirements and procedures set forth in the following policies, or any updates thereto:

- HHS Travel Manual, January 2012, Revision 1 – Effective November 1, 2014
- Memorandum from the General Counsel “Agency Gift Acceptance Authorities and the Co-Sponsorship of Events with Outside Non-Federal Entities,” August 8, 2002

There are numerous Federal acquisition, fiscal, and ethics laws and regulations that apply to the issues raised by conferences in which the Federal government participates. The Office of Government Ethics (OGE) has issued an updated list of a selection of ethic laws and regulations and their interpretation. A link to the guide, "Conferences: A Guide for Ethics Counselors" can be found on the OGE website: <http://www.oge.gov/Program-Management/Program-Management-Resources/Ethics-Community/Ethics-Community/>.

Additionally, OPDIVs and STAFFDIVs must conduct meetings in space controlled by the Federal Government whenever practicable and cost effective. Therefore, OPDIVs and STAFFDIVs shall establish internal policies and procedures to approve the obligation of funds for non-federal meeting space. The following website provides information about meeting space available in federal facilities: <http://fedmeetingspace.cfoc.gov>.

1.2 Definitions

The following definitions apply:

A. Conference

OMB Memorandum M-12-12 employs, and HHS has adopted, the following definition for a conference from the [Federal Travel Regulation](#) (FTR):

“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](#).”

This term is clarified, based on the common dictionary meanings of a conference, seminar and symposium, as follows:

- Conference: “a formal meeting in which many people gather in order to talk about ideas or problems related to a particular topic (such as medicine or business) usually for several days, or a formal meeting in which a small number of people talk about something.” <http://www.merriam-webster.com/dictionary/conference>
- Symposium: “a formal meeting at which experts discuss a particular topic” <http://www.merriam-webster.com/dictionary/symposium>
- Seminar: “a meeting in which you receive information on and training in a particular subject, or a class offered to a small group of students at a college or university.” <http://www.merriam-webster.com/dictionary/seminar>

Therefore, (1) meetings and events falling within the plain meaning of conference, symposium, and seminar where attendees travel, and (2) training activities that are considered to be conferences under 5 CFR 410.404¹, are also considered conferences for the purposes of this policy.

A list of typical HHS meetings and events that are not considered conferences is provided at Exhibit 2. These, and similar OPDIV/STAFFDIV-specific events, are exempt from the request and approval (Section 1.3) and reporting (Section 1.4) requirements of this policy. In applying this list, OPDIVs and STAFFDIVs must use caution in determining which meetings and events are not conferences to ensure compliance with M-12-12. Notwithstanding this distinction, such meetings and events must still represent an efficient and effective use of taxpayer funds and be able to withstand public scrutiny.

B. Conference Expense

OMB Memorandum M-12-12 defines conference expenses as:

¹ **5 C.F.R 410.404 Determining if a conference is a training activity.**

Agencies may sponsor an employee's attendance at a conference as a developmental assignment under section 4110 of title 5, United States Code, when—

- (a) The announced purpose of the conference is educational or instructional;
- (b) More than half of the time is scheduled for a planned, organized exchange of information between presenters and audience which meets the definition of training in section 4101 of title 5, United States Code;
- (c) The content of the conference is germane to improving individual and/or organizational performance, and
- (d) Development benefits will be derived through the employee's attendance.

“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, registration fees, ground transportation, and other expenses as defined by the FTR. All outlays for conference preparation and planning should be included, but the Federal employee time for conference preparation should not be included. Conference expenses should be net of any fees or revenue received by the agency through the conference and should not include costs to ensure the safety of attending governmental officials.”

Based on and in addition to the expenses outlined by OMB, Exhibit 3 provides a list of expenses that are required to be included in the estimated and reported conference costs.

OPDIVs and STAFFDIVs are reminded that agencies may not use a grant or contract for the purpose of defraying the costs of an HHS conference unless such conference is directly and programmatically related to the purpose for which the grant or contract was awarded.

C. Funds

The term “funds”, as used herein, refers to those from an annual, multi-year, no year, or mandatory appropriation; appropriated user fees; gift funds; or reimbursements from such appropriations, as well as non-appropriated funds, i.e. funding set by law, etc.

1.3 **Approval Requirements**

HHS OPDIVs and STAFFDIVs shall designate representatives to lead and coordinate the approval and reporting requirements of this policy within their Office. Representative names shall be provided to Clarence Randall at clarence.randall@hhs.gov.

A. Operating Divisions

The OPDIVs may use the Conference Tracking and Approval System (CTA) to process its conference requests and facilitate reporting. The following approval thresholds apply to, and must be met prior to the obligation of funds for, conferences to be hosted directly by the OPDIV, sponsored by the OPDIV (e.g. through funding or a grant, cooperative agreement, interagency agreement, or co-sponsorship agreement), or attended by OPDIV staff (e.g. conferences hosted by another OPDIV, STAFFDIV, or Federal Agency or by a non-federal organization):

- Less than \$100,000: An OPDIV designated representative or representatives.
- From \$100,000 to \$500,000: The OPDIV Head’s Deputy or Equivalent (non-delegable below this level).
- Greater than \$500,000: The OPDIV Head (non-delegable).

B. Staff Divisions

The Department must aggregate costs for the same conference across all Office of the Secretary (OS) STAFFDIVs. Therefore, all STAFFDIVs must use the Conference Tracking and Approval System (CTA) to facilitate the request and approval process and produce reports for conferences. The following approval thresholds apply to, and must be met prior to the obligation of funds for, conferences to be hosted directly by the STAFFDIV, sponsored by the STAFFDIV (e.g. through a grant, agreement, etc.), or attended by STAFFDIV staff (e.g. conferences hosted by an OPDIV, another Federal Agency, or a non-federal organization):

- In aggregate (across OS STAFFDIVs) less than \$75,000: The STAFFDIV's designated representative or representatives may approve the request.
- In aggregate (across OS STAFFDIVs) from \$75,000 to \$475,000: The Deputy Secretary, following STAFFDIV Head approval.
- In aggregate (across OS STAFFDIVs) greater than \$475,000: The Secretary, following STAFFDIV Head and Deputy Secretary approvals.

1.4 Reporting Requirements

OPDIVs and STAFFDIVs must continue to comply with the following annual and post-event reporting requirements:

A. M-12-12 Annual Report

OMB Memorandum M-12-12 requires agencies to publicly report, by January 31 of each year, all conferences hosted by the agency during the previous fiscal year where the net expenses were in excess of \$100,000. Beginning with the fiscal year 2015 report, the reporting process will be as follows:

- OPDIVs: By January 31, each OPDIV will publish a Section 508 compliant report on its website on each conference hosted in excess of \$100,000 based on the information required in Exhibit 3. The OPDIVs' reports must reflect the most accurate information possible for costs and attendance levels. Additionally, the OPDIVs' reports must include a narrative report that includes information about the net conference expenses for the fiscal year incurred by the agency as well as a general report about conference activities throughout the year. A link to the report must be provided to ASFR, which will be provided to the HHS Web Team for inclusion on the HHS website.
- STAFFDIVs: ASFR will develop the report for the Office of the Secretary and its STAFFDIVs, using information from the approved conferences; validate and update the draft report with support from the STAFFDIV designated representatives, to include the most accurate information possible for costs and attendance levels; and publish the report on the HHS website.

B. OIG Annual Report

Section 739 of the Consolidated and Further Continuing Appropriations Act, 2015, requires the submission of an additional annual report to the OIG regarding the costs and contracting procedures related to each conference held (hosted) by HHS during each fiscal year in excess of \$100,000. Beginning with the fiscal year 2015 report, the reporting process will be as follows:

- OPDIVs: By January 31st, each OPDIV will submit its report directly to the OIG (at OIGConferencereports@oig.hhs.gov) on each conference hosted in excess of \$100,000 based on the information required in Exhibit 3.
- STAFFDIVs: ASFR will develop the report for the Office of the Secretary, using information from the approved conferences; validate the data with the STAFFDIV designated representative, to include the most accurate information possible for costs and attendance levels; and will submit its report directly to the OIG.

C. Reporting of Conferences in Excess of \$20,000

To meet the requirements of Section 739(c) of the FY 2015 Appropriations Act, OPDIVs and STAFFDIVs are required to submit a report on each conference they hold where expenses to the United States Government are in excess of \$20,000. This report is due within 15 (calendar) days of the date of the conference; therefore, and to follow a consistent reporting cycle, using the template at Exhibit 3:

- For conferences held on the 1st through 10th of each month, the report shall be submitted to the OIG (at OIGConferencereports@oig.hhs.gov) by the 15th.
- For conferences held on the 11th through 20th each month, the report shall be submitted to the OIG by the 25th.
- For conferences held on the 21st through the end of the month, the report shall be submitted to the OIG by the 4th.

1.5 Use of Conference Fees

Agencies must have statutory authority to charge a fee for one of its programs or activities. In addition, even if an agency has authority to charge a fee, it may not retain and use the amounts collected without statutory authority. An appropriation establishes a maximum authorized program level, meaning that an agency, absent statutory authorization, cannot operate beyond the level that can be paid for by its appropriations. An agency may not circumvent these limitations by augmenting its appropriations from sources outside the government, unless Congress has so authorized the agency. Questions on this topic should be addressed to the HHS Office of the General Counsel, General Law Division.

1.6 Non-Federal Attendee Travel Restrictions

OPDIVs and STAFFDIVs shall abide by the general rule that an appropriation may not be used for non-Federal employee travel, transportation, and subsistence expenses for a meeting.

Specifically, 31 U.S.C. § 1345, “Expenses of Meetings”, applies to our appropriations and states that “except as specifically provided by law, an appropriation may not be used for [non-Federal employee] travel, transportation, and subsistence expenses for a meeting.” Therefore and as a general principle, appropriated funds generally cannot be used to pay the expenses of persons who are not federal employees. There are a few exceptions to these general rules/principles, as follow below, that may be applied in determining to fund non-Federal employee travel to HHS’s or other organizations’ meetings and conferences.

A. Statutory Authority

Agencies may have a unique statutory authority to use their appropriated funds for travel and other expenses of non-federal employees. This statutory authority must be specific (e.g., general training and technical assistance authority is not enough). Statutorily-required (rather than merely authorized) conferences *may* provide sufficient specificity.

B. Invitational Travel Statute

5 U.S.C. § 5703, stated that "an employee serving intermittently in the Government service as an expert or consultant or serving without pay or at \$1, may be allowed travel or transportation expenses, under this subchapter, while away from his home or regular place of business and at the place of employment or service." This statute permits agencies to invite individuals to a meeting or conference at government expense if the individuals are legitimately performing a direct service to the government, such as making a presentation or advising in an area of their expertise. Paying for the travel and subsistence of invitational travelers must still serve a legitimate authorized purpose of the agency for which funds have been appropriated, such as to provide technical assistance as authorized by program statute. Travel Regulations would apply and travel orders would need to be issued to such individuals.

C. HHS Appropriations Exception

Section 505 of the FY1993 Labor/HHS/Ed appropriations act, (Pub. L. 102-394), 31 U.S.C. § 1345 note, provides that “appropriations contained in this Act or subsequent Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Acts, available for salaries and expenses, shall be available for expenses of attendance at meetings which are concerned with the functions or activities for which the appropriation is made or which will contribute to improved conduct, supervision, or management of those functions or activities.” The appropriate program official must determine that the private individual’s attendance will contribute to improved conduct, supervision, or management of those functions or activities. Funds must come from Salaries and Expenses for this exception to apply.

D. Limited Procurement Exception

An agency may contract for various conference-related services, including services related to presentations. Contractors may, but are not required to, utilize subcontractors for the purpose of providing such services, and the contractor may incorporate allowable costs (including travel expenses) into its price for these services. However: (a) Contractors, through their employees or

subcontractors, must provide a deliverable (e.g., a speech, presentation, or other specific role) and (b) Contractors should generally be responsible for selecting the individuals (their employees or subcontractors) who will provide services such as presentations, though the contracting officer, with input from the program office, may have final approval over a list of topics and presenters if required by the contract. Various allowable contract costs (including travel) may be properly included in the contractor's price for the deliverable in question. This exception may not be used to pay for non-Federal employees to simply attend an event, even if they might say something during the event and you need to work closely with the Office of the General Counsel, General Law Division, on specific language for such contracts on a case-by case basis.

E. Grant Funds

Reasonable and allocable travel costs may be charged to a grant by the grantee. See OMB Circulars A-87, App. B, ¶ 43; A-122, App. B, ¶ 51. Where authority exists, agencies may supplement terms and conditions of the grant to require grantees to use grant funds to travel to events. Sample term and condition: “The [Program] Administrator, or designee from the State or Territory [Program] Lead Agency, must attend and participate in HHS-sponsored national or regional in-person meetings and trainings, as directed by the [OPDIV]. This award may be used for allowable costs associated with travel, lodging, per diem, and other related expenses associated with the grantee meetings and trainings.”

Since OMB Memorandum M-12-12 does not require such travel reimbursements to be included in the cost of conferences hosted by the agency, OPDIVs/STAFFDIVs should exclude allowable travel costs charged to grant funds when determining the cost of an HHS Conference. (Ref. Memorandum M-12-12 footnote 5: “‘Conference expenses’ are defined 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. ...”

1.7 Contractor Support for Conferences

The NIH Conference Administrative and Travel Services Contracts (see NIH's website at: <http://nihcatsii.olao.od.nih.gov/>) are considered to be part of the Department's strategic sourcing efforts to leverage HHS-wide spend, reduce contract duplication, increase purchasing efficiencies, and reduce the total cost of conferences hosted by HHS. OPDIVs and STAFFDIVs are encouraged to use these, or other multiple-award contracts that have been established by the OPDIV/STAFFDIV specifically for the logistical and administrative aspects of conference support.

Conference Spending Provisions of the HHS Appropriations Acts

The following requirements were enacted in Section 3003 of the Consolidated and Further Continuing Appropriations Act, 2013; Section 119 of the Continuing Appropriations Act, 2014; and Title VII, Section 739 of the Consolidated and Further Continuing Appropriations Act, 2015; and are expected to continue and be enforced in subsequent Fiscal Years:

“(a) The head of any Executive branch department, agency, board, commission, or office funded by this or any other appropriations Act shall submit annual reports to the Inspector General or senior ethics official for any entity without an Inspector General, regarding the costs and contracting procedures related to each conference held by any such department, agency, board, commission, or office during fiscal year 2013 (and 2014) for which the cost to the United States Government was more than \$100,000.

“(b) Each report submitted shall include, for each conference described in subsection (a) held during the applicable period—

(1) a description of its purpose;

(2) the number of participants attending;

(3) a detailed statement of the costs to the United States Government, including — (A) the cost of any food or beverages; (B) the cost of any audio-visual services; (C) the cost of employee or contractor travel to and from the conference; and (D) a discussion of the methodology used to determine which costs relate to the conference; and

(4) a 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.

“(c) Within 15 days of the date of a conference held by any Executive branch department, agency, board, commission, or office funded by this or any other appropriations Act during fiscal year 2013 (and 2014) for which the cost to the United States Government was more than \$20,000, the head of any such department, agency, board, commission, or office shall notify the Inspector General or senior ethics official for any entity without an Inspector General, of the date, location, and number of employees attending such conference.

“(d) A grant or contract funded by amounts appropriated by this or any other appropriations Act to an Executive branch agency may not be used for the purpose of defraying the costs of a conference described in subsection (c) that is not directly and programmatically related to the purpose for which the grant or contract was awarded, such as a conference held in connection with planning, training, assessment, review, or other routine purposes related to a project funded by the grant or contract.

“(e) None of the funds made available in this or any other appropriations Act may be used for travel and conference activities that are not in compliance with Office of Management and Budget Memorandum M-12-12 dated May 11, 2012.”

The following outlines the policy implications of these provisions:

- Sub-Sections (a) and (b) require additional annual reporting requirements, which are addressed in Section 1.4 B of the policy.
- Sub-Section (c) requires on-going reporting as described in Section 1.4 A and Exhibit 3 of the Policy.
- Sub-Section (d) reminds OPDIVs and STAFFDIVs that agencies may not use a grant or contract for the purpose of defraying the costs of an HHS conference unless such conference is directly and programmatically related to the purpose for which the grant or contract was awarded.
- Sub-Section (e) restricts the use of funds appropriated in the HHS Appropriations Acts, beginning with FY2013, for travel and conference activities unless they are consistent with OMB Memorandum M-12-12, and thus, makes it an Antideficiency Act (ADA) violation to use any HHS funds for travel and conferences that are inconsistent with OMB Memorandum M-12-12.

The following requirements were enacted in Title V, Section 527 of the Consolidated and Further Continuing Appropriations Act, 2015; and are expected to continue and be enforced in subsequent Fiscal Years:

SEC. 527. For purposes of carrying out Executive Order 13589, Office of Management and Budget Memorandum M-12-12 dated May 11, 2012, and requirements contained in the annual appropriations bills relating to conference attendance and expenditures:

- (1) the operating divisions of HHS shall be considered independent agencies; and*
- (2) attendance at and support for scientific conferences shall be tabulated separately from and not included in agency totals.*

Note: The impacts and implementation of Subsection 527(2) will be made in a subsequent update to this policy. Therefore, scientific conferences must continue to be approved in accordance with the thresholds and processes established in Policy Section 1.3, and reported in accordance with Policy Section 1.4.

Typical Meetings and Events That are Not Conferences

In accordance with Section 1.2 A of the policy, the following meetings and events are not considered conferences and are exempt from the request and approval and reporting requirements of the policy. They are based on the travel purpose codes as outlined in Appendix C to Chapter 301 of the FTR. Therefore, any travel authorized for such meetings/events should apply the relevant codes (travel to conferences should be coded as: Conference - Other Than Training).

Mission (Operational):

- Federal Employee's day-to-day operational or managerial activities that may in certain instances involve limited travel.
- Hearings such as before governing oversight boards, appeals boards, courts, etc.
- Site and Technical Assistance visits of a specific site or series of sites to fulfill a specific program's oversight or assistance requirements.
- Inspections of a specific site or series of sites to fulfill a specific program's oversight requirements.
- Audits to fulfill a specific oversight or enforcement requirements.
- Investigations to fulfill a specific oversight or enforcement requirement.
- Examinations to fulfill a specific oversight or enforcement requirements.
- National / Federal Advisory Council meetings governed Federal Advisory Committee Act (FACA).
- General staff meetings that are a daily or regular occurrence and within the normal course of business [that may in certain instances involve limited travel], such as a meeting that takes place bi-weekly to discuss the previous week's events and/or where certain employees from another region attend to weigh in on the specific topic.
- Program Review/Kickoffs if with a specific grantee or contractor regarding a specific program, grant, or contract.
- Peer Review meetings if conducted to fulfill a statutory requirement to review grant application.
- Evaluation Panel meetings if conducted to fulfill regulatory requirement to evaluate contractor proposals.
- Solicitation / Funding Opportunity Announcement Review Board meetings between the awarding agency and only those individuals selected to serve on a particular review board.
 - Industry Days, Pre-solicitation, and Pre-proposal conferences, to the extent they involve official federal attendee travel, are considered conferences.
- Tribal Compact or Contract Negotiation meetings if held with one Tribe or Confederation of Tribes regarding that Tribe's specific compact or contract.
- Trade or Third-Party/International Negotiations regarding a specific agreement.
- Scientific meetings with a specific investigator or investigating team regarding a specific item, area of scientific inquiry, or public health need.

Special Agency Mission:

- Security missions conducted for specific, programmatic purposes.
- Emergency response/recovery such as civil, natural disasters, evacuation, catastrophic events.
- Technical assistance or regulatory oversight or monitoring meetings to fulfill a specific program's oversight, monitoring, or training requirements such as to send subject matter experts to state, local, and international sites to provide and share expertise in disease intervention, public health practices, research, etc.
- Evaluations such as to fulfill a specific program's oversight or monitoring requirements.
- Assessments such as to fulfill a specific program's oversight or monitoring requirements

Typical Meetings and Events That are Not Conferences

Training (Non-Conference):

- Classroom or instructor based certification and/or job training of federal staff to become proficient or qualified in one or more areas of responsibility.
- Classroom or instructor based certification and/or job training of federal staff to receive instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields.

Conference Expenses and Reporting Requirements

A. Conference Expenses. The following outlines the expenses to be included and used to determine the total estimated cost of each conference based on the respective types of conference requests and to the extent the OPDIV's/STAFFDIV's funds will be used for such expenses (Policy Section 1.2.B):

OPDIV/STAFFDIV Hosted, Sponsored, or Co-Sponsored Conferences

- Contractor costs (e.g. for planning, supporting, administering, aiding in logistics, documenting, etc.)
- Amount of the grant or an agreement associated with the conference
- Venue Costs (hire of rooms)
- Audiovisual costs
- Speaker Fees
- Printing Costs
- Promotional Marketing
- Training Materials
- Exhibit Costs
- Any food or beverage costs (see the January 3, 2012 policy on the Use of Appropriated Funds for Food)
- Federal Employee travel and per diem expenses
- Non-Federal Attendee travel and per diem expenses
- Registration Fees
- Other costs (ground transportation, shipping, supplies, etc.)

OPDIV/STAFFDIV Attended Conferences (those hosted by another OPDIV, STAFFDIV, Federal Agency, or non-federal organization)

- Any miscellaneous costs to be funded for the conference (exhibit fees, ground transportation, shipping, printing, supplies, etc.)
- Federal Employee travel and per diem expenses
- Non-Federal Attendee travel and per diem expenses
- Registration fees

B. M-12-12 Annual Report Requirements. In developing the M-12-12 annual report (Policy Section 1.4.A), the following information must be included for each conference included in the report:

- the name or title of the conference
- the location of the conference to include:
 - Venue name
 - City
 - State, or Country if international
- the date(s) of the conference
- the purpose of the conference to include a brief explanation how the conference advanced the mission of the agency
- the total conference expenses incurred by the OPDIV/STAFFDIV for the conference
- the total number of attendees
- the total number individuals whose travel expenses or other conference expenses were paid by the agency

Conference Expenses and Reporting Requirements

- if applicable, a description of the exceptional circumstances – as approved by the OPDIV Head or Secretary (for the STAFFDIVs) – that necessitated exceeding \$500,000

C. Annual OIG Report Requirements. In developing the annual report to the OIG (Policy Section 1.4.A), the following information must be included for each conference included in the report:

- the name or title of the conference
- the location of the conference to include:
 - Venue name
 - City
 - State, or Country if international
- the date(s) of the conference
- the purpose of the conference to include a brief explanation how the conference advanced the mission of the agency
- the total conference expenses incurred by the OPDIV/STAFFDIV for the conference
- a breakout of the costs for:
 - contractor support
 - any audio-visual services
 - any food or beverages (which should be \$0, see the January 3, 2012 policy on the Use of Appropriated Funds for Food)
 - federal attendee travel, per diem, and registration
 - non-federal attendee travel, per diem, and registration
- the total number of attendees
- a discussion of the methodology used to determine which costs relate to the conference
- a description of the contracting procedures used including discussions of:
 - whether contracts were awarded on a competitive basis
 - any cost comparison conducted by the OPDIV or STAFFDIV in evaluating potential contractors for the conference

Regarding the contracting and cost comparison procedures, the following are the standard descriptions to be used in the reports:

Contracting Procedures:

1. Competed under Federal Supply Schedule Ordering Procedures of FAR 8.405
2. Competed under Simplified Acquisition Procedures of FAR Part 13
3. Full and Open Competition under FAR Part 15
4. Fair Opportunity under Multiple Award Contract, including previously competed strategic sources, under FAR 16.505(b)(1)
5. Full and Open Competition after exclusion of sources (Small Business Set Aside) under FAR 19.5
6. Other than Full and Open Competition based on Circumstances under FAR 6.302
7. Solicited from a single source using Federal Supply Schedule Ordering Procedures under FAR 8.405-6
8. Solicited from a single source using simplified acquisitions under FAR 13.106-1(b) or 13.501
9. Exception to Fair Opportunity under FAR 16.505(b)(2)
10. 8(a) Directed Source under FAR 19.8
11. Exercise of Option under FAR 17.207
12. N/A - Conference was supported by a Grant, Cooperative Agreement, Interagency Agreement, or Co-sponsorship Agreement

Conference Expenses and Reporting Requirements

13. N/A – Contractor support was not used

Cost Comparison Method:

1. Single Offer – Cost/price analysis performed in accordance with FAR 13 or FAR 15 as applicable
 - Note – use this description if selecting 1 through 6 from the selection above and only one offer was received, or if selecting choices 7 through 10 above.
2. Best Value Comparison – Multiple offers compared on combination of cost/price and technical factors, award based on best value continuum
 - Note – use this description if selecting choices 1 through 6 above and a best value source selection approach was used.
3. Low Price Technically Acceptable (LPTA) Comparison – Multiple offers compared on combination of either cost or price and technical factors, award made to the technically acceptable offer at the lowest price
 - Note – use this description if selecting choices 1 through 6 above and a LPTA source selection approach was used
4. Determination that Option Exercise is the most advantageous method of fulfilling the Government's needs
 - Note – use this description if selecting choice 11 from the above listing
5. N/A – Conference was supported by a Grant, Cooperative Agreement, Interagency Agreement, or Co-sponsorship Agreement
 - Note – use this description if selecting choice 12 from the above listing
6. N/A – Conference was not supported by a contractor
 - Note – use this description if selecting choice 13 from the above listing

D. Recurring OIG Report Requirements. The following template must be used to submit the recurring reports on conferences hosted in excess of \$20,000 (Policy Section 1.4.B).

