MRP Guidance on Planning, Approval and Reporting Requirements for Conference and Non-Conference Events

Purpose and summary of new guidance

For the past several years, there has been a government-wide effort to ensure that conference spending is cost-effective and advances the mission and goals of each agency. The purpose of this document is to provide MRP agencies with revised guidance on conference planning, approval, and reporting requirements. The source for this guidance is the memorandum from the USDA Chief Financial Officer, *New Requirements for Conference Planning and Reporting*, issued on June 6, 2013. The guidance also includes MRP policy for approving other events that are not covered by OCFO policy. This guidance supersedes all previously issued MRP guidance on conference planning, approval and reporting requirements.

OCFO based its memo on the following authorities and added approval requirements that USDA agencies must follow in addition to the requirements in these authorities.

- Section 14208 of the Food, Conservation, and Energy Act of 2008 (Farm Bill): Contains reporting requirements for conferences that USDA agencies must follow.
- OMB Memo 12-12, *Promoting Efficient Spending to Support Agency Operations*: Outlines a series of new policies and practices for conference sponsoring, hosting, and attendance that all agencies must follow.
- Section 3003 of the "Consolidated and Further Continuing Appropriation Act, 2013"contains new requirements for all agencies but does not relieve other mandated conference requirements. This is the new requirement that prompted OCFO to issue new guidance to all USDA agencies.
- Part 301-74 – Conference Planning, Federal Travel Regulations

Summary of changes:

- <u>Definition of a conference:</u> The requirements for planning, approving and reporting on conferences depends upon how the term 'conference' is defined. This guidance defines what constitutes a conference, versus training or mission – related travel.
- <u>Conference pre-approval thresholds:</u> The conference pre-approval thresholds and requirements have changed.
- <u>Conference reporting requirements:</u> The conference reporting requirements have changed.
- <u>Mandate to comply with OMB Memorandum M-12-12:</u> Perhaps the most important change in requirements is that Section 3003 restricts the use of funds available for obligation during FY 2013 for travel and conference activity unless they are consistent with OMB Memo 12-12. This language in effect makes it an Anti-deficiency Act (ADA) violation to use any FY 2013 funds for travel and conferences inconsistent with OMB M-12-12.

Determining what events are covered by the guidance

The following information is intended as a guide for MRP personnel to follow in determining what approvals and reporting requirements must be followed when planning various events such as conferences, meetings, retreats, seminars, symposia, or training that involve attendee travel. Oftentimes, events are not easy to define or place in categories and there will not always be absolute certainty in making these determinations. Because Section 3003 of the Appropriations Act makes it an ADA violation to use funds for travel and conferences without following the guidance in OMB memo 12-12, we must evaluate events carefully to ensure we protect the mission area agencies.

The first step in evaluating an event is to determine if it is a conference, training, or mission (operational) related travel. The outcome of that evaluation along with the estimated cost of the events will determine the level of approval required as well as whether it needs to be reported on the Conference Transparency Report.

I. What is a conference event?

An agency hosted, sponsored or attended meeting, retreat, seminar, symposium or event that involves attendee travel (foreign or domestic), speakers and/or exhibitors, and sessions with optional attendance. A conference event may encompass either domestic or foreign travel. Some examples of conferences are: Blacks in Government Conference, Federally Employed Women's Conference, Agricultural Outlook Forum, and the International Poultry Expo.

II. What is a non-conference event?

There are two types of these events: mission (operational) related travel and training.

Mission Operational – is travel to a particular site in order to perform operational or managerial activities, or travel to attend a meeting to discuss general agency operations, review status reports, or discuss topics of general interest. Examples: employee's day-to-day operational or managerial activities, as defined by the agency, to include, but not be limited to: hearings, site visit, information meeting, inspections, audits, investigations, and examinations. Some examples are: FGIS or PSP Managers Meetings and the Grain Inspection Advisory Committee Meeting.

Note: Agency personnel must supply a specific statement on the Review and Determination Request form (referenced in Section VI of this guidance) as to which part of the mission is being supported when this option is selected.

APHIS also considers all special travel such as emergency response and recovery, details, security missions, natural disasters, evacuation, technical assistance, evaluations, and assessments to be part of mission operational.

Training – is in conjunction with educational activities to become proficient or qualified in one or more areas of responsibility. The 5 USC 4101 (4) states "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 and organizational performance and assist in achieving the agency's mission and performance goals. Examples: internships, Contractor Representation training, job required training, continuing professional education or professional development units for certification of professional competency. Examples of more specific agency training are : Creative Leadership for Managers and Supervisors, Developing Effective Presentation Skills, Safety and Health Training, Advanced Leadership Development Program Training, and Training for International Assignments.

Exception – if either one of these non-conference activities are conducted in a 'conference-like' setting where the appearance is such that any logical observer would look at the situation and say 'this is a conference', a decision will be made by the MRP Chief Financial Officer (who has been designated as the Agency Senior Accountable Travel Office) as to whether or not the event should be processed as a conference.

OCFO has further restricted the approval authority for training events incorporated into a conference sponsored or hosted by a non-government organization. These events must be approved as a conference. Some examples of these training events are the Blacks in Government and Federally Employed Women's conferences.

Approval requirements for conferences and non-conferences

III. What information must be provided in the approval packages for non- conferences costing $50,000 or more?

Requests to host or attend non-conference events costing $50,000 or more require the approval of the agency administrator and must include the following:

- Agenda
- Decision Memo
- List of attendees and duty stations
- Estimated conference costs: Note – include salary and benefits estimates (total estimated cost of all employees time en-route to and from conference and time at the conference) on the template as an expense but do **not** add salary and benefits costs into the estimated conference cost total

Note: Refer to the Events Approval Thresholds Diagram on Page 6 for Non-conference events under $50,000.

IV. What information must be provided in the approval packages for conferences?

Conferences, whether hosted or attended in foreign or domestic locations, require pre-approval using the following process. The conference proposal packet must include:

- USDA Conference Approval Template, dated June 2013
- Agenda
- Decision Memorandum
- List of attendees and duty stations
- Estimated conference costs: Note – include salary and benefits estimates (total estimated cost of all employees time en-route to and from conference and time at the conference) on the template as an expense but do **not** add salary and benefits costs into the estimated conference cost total
- 3 Site Selection Cost Analyses (If event location is hosted by USDA and less than 50% of the attendees are stationed outside of where the conference event is being held)
- Justification for exceeding per attendee/per day benchmark to determine excessive cost (when applicable).

V. How can I determine excessive conference costs?

As a result of the highly publicized GSA conference in 2010, OMB established the below benchmarks for determining excessive conference costs. MRP agencies will make an effort to avoid this situation. However, when this situation is unavoidable a detailed justification is required.

- Threshold of **$3,000 per person** - computation is derived by the total cost of the conference (excluding salary and benefits) divided by the number of agency participants + non-USDA participants whose expenses were paid by the agency
- Threshold of **$600 per person per day** – computed by dividing the above referenced per person estimated cost by the actual number of days of the event (calculating only the start date of the event to the end date of the event)
- In addition, OCFO has established a $12 per person limit for refreshments. If exceeded, a justification must be included with the conference request for approval.

VI. How do I calculate salary and benefit costs?

To calculate salary and benefit estimates for the request for approval:

- Use the hourly rate information at the below link to the OPM pay tables to calculate salary estimates for all agency attendees.
  http://www.aphis.usda.gov/mrpbs/hr/pay_leave_tod/pay_tables.shtml
- Calculate benefits at 33% of the total salary estimates for all agency attendees.

To calculate salary and benefits actual costs:

- Use the FMMI Payroll Detail Report to quantify salary and benefits for all agency attendees. Contact your program budget officer for assistance with obtaining this report.

Approval Process for Training and Mission Operational Travel

The Travel Services Center has implemented a new review process to ensure that mission operational related travel and training events are not mistakenly submitted through the conference approval process or reported as conferences. If your event has already been determined to be a conference, skip to the next section of this guidance.

VII. If I am unsure whether or not an event is a conference, what should I do?

For a non-conference / conference event determination from TSC:

- Submit a TSC Review and Determination Request form with a copy of the event's agenda at least 50 days prior to the start of the event.
- TSC will respond within 3 business days with an event determination provided on a checklist which will include further instructions when agency level event approval is needed.

VIII. What are the event approval thresholds?

Event and Cost	Approval Level
Non-conference under $50,000	No approval or reporting required *(based on a TSC Review and Determination Checklist and/or the Non-conferences list on the TSC webpage)*
Non-conference $50,000 and over	Agency Administrator
Conferences less than $40,000	Agency Administrator
Conferences $40,000 - $74,999	MRP Under Secretary
Conferences between $75,000 and $450,000	Deputy Secretary (with pre-approval from OCFO)
Conferences over $450,000	Secretary of Agriculture

IX. In what timeframe must I submit my conference request for approval?

The below timeframes are suggested in order for you to receive approval of the event well in advance to complete the necessary procurement and travel preparations within sufficient time. These timeframes are also needed to allow adequate time for questions and follow-up during the review and approval process. Please be advised, no funds may be obligated prior to the approval of the event.

- **Request requiring the Administrator's Approval** – The documentation and request for approval must have completed all program requirements and be received by TSC no less than 15 days in advance of the conference to guarantee timely approval.

- **Requests requiring the MRP Under Secretary's Approval -** The documentation and request must have completed all program requirements and received by TSC 45 days in advance of the conference to guarantee timely approval.

- **Requests requiring the Deputy Secretary's approval or higher -** The request must have completed all program requirements and received by TSC 75 days in advance of the conference to guarantee timely approval.

Reporting Requirements for Conferences

X. How must conferences be reported?

Conferences are reported on the below reports in accordance with the before mentioned authorities.

- **Conference Transparency Reporting (CTR):**
  - All conferences must be reported quarterly on the CTR and must be certified by program Deputy Administrators and the Senior Accountable Travel Official, (SATO)
  - TSC provides the program conference point of contacts with the report due dates at the beginning of the Fiscal Year as well as sends a courtesy reminder notice prior to the due date each quarter.
  - The CTR template and the Deputy Administrator certification form is available at TSC's webpage referenced below**.**

- **Office of the Inspector General (OIG) Report**

  Program offices are now required to complete and submit an OIG report template to TSC for all conferences which actual costs exceed 20K (excluding salary and benefit costs) within 10 days of the commencement of the conference. This (applies to both the paper version requests as well as those submitted in the USDA's Conference Transparency Accountability Tracking system (CTAT) when implemented.

For questions concerning this guidance, contact Lisa Fyall at 202-720-7045 or Lisa.Fyall@usda.gov.