

Department of Veterans Affairs

Financial Policy

Volume XIV

Travel

Chapter 10

Conference Planning, Oversight, and Reporting

Approved:

Edward J. Murray Interim Assistant Secretary for Management And Interim Chief Financial Officer

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VA Financial Policies and Procedures Conference Planning, Oversight, and Reporting

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1001 OVERVIEW

This chapter establishes the Department of Veterans Affairs (VA) financial policies and procedures relating to conference planning, reporting, and oversight. The purpose of this chapter is to emphasize the need for proper planning and oversight of conferences, including associated travel. As defined by the Federal Travel Regulation (FTR), a conference may include 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 "Determining if a conference is a training activity."

There are numerous Federal acquisition regulations, fiscal policies, and ethics laws that apply to Federal government conference planning, participation, reporting, and oversight. This chapter articulates policy and provides guidance to implement and supplement those portions of the FTR pertaining to conference planning, Congressional, and Office of Management and Budget (OMB) requirements on conference reporting.

VA is legally mandated by Public Law (P.L.) 112-154, *Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012* to report on any VA sponsored or cosponsored conference, meeting, or other similar forum which either:

• Costs \$20,000 or more, or

• Costs less than \$20,000 and there are 50 or more attendees including at least one (1) or more VA employees.

Pursuant to the Inspector General Act of 1978, as amended, Office of Inspector General (OIG) employees shall adhere to travel directives, policies, procedures, and guidance of the Office of Inspector General.

1002 REVISIONS

Section	Revision	Office	Reason for Change	Effective Date
100301	Defined Approving Official	CTMRO	General Policy Update	January 2017
100302	Specified bundling restriction applies to VA-sponsored conferences only	CTMRO	General Policy Update	January 2017

Section	Revision	Office	Reason for Change	Effective Date
100303	Added note to clarify conference definition and linked to OMB memorandum 17-08	CTMRO	General Policy Update	January 2017
100304	Removed reference to non VA-sponsored conferences in Conference Package definition	CTMRO	General Policy Update	January 2017
100306	Clarified Executive Champion definition	CTMRO	General Policy Update	January 2017
100308	Added definition of Formal Classroom Training	CTRMO	General Policy Update	January 2017
100309	Modified Per Diem definition	CTRMO	General Policy Update	January 2017
100317	Deleted COSVA Approval definition, changed "Attendee List" to "Traveler List" and arranged alphabetically (changed reference from "attendee list" to "traveler list" throughout)	CTMRO	General Policy Update	January 2017
100501.01	C.4. Removed reference to attendee time cost D.1. Removed redundant language and added face-to- face to item a D.2. Added hyperlink to Chief of Staff memo E. Removed unique site examples	CTMRO	General Policy Update	January 2017
100501.02	A. Changed "should" to "must"	CTMRO	Administrative Update	January 2017

Section	Revision	Office	Reason for Change	Effective Date
100501.03	C.2. Updated for CORK II requirements C.3. Provided clarification when revised CP is required when estimates change	CTMRO	General Policy Update	January 2017
100501.04	Added calendar days throughout to clarify reporting requirements. Updated for CORK II requirements	CTMRO	Administrative Update	January 2017
100502.01	Modified verbiage to align with EC definition	CTMRO	Administrative Update	January 2017
100502.02	Removed CTMRO from oversight of DOA memos for non VA-sponsored conferences A.1. Revised language for approval documentation B. Added "bundled" to clarify bundling is permitted for Federal non VA-sponsored conferences C. Modified language to remove waiver requirements (per M-17-08), removed 10008a from use (form rescinded), provided cost requirements for approval	CTMRO	General Policy Update	January 2017
100503	Moved instructions for international conferences from 100501	CTRMO	Adminstrative Update	January 2017
Appendix A	Updated to align with policy changes	CTMRO	General Policy Update	January 2017
Appendix B	Updated to revise checklist questions with policy/form updates	CTMRO	General Policy Update	January 2017

Section	Revision	Office	Reason for Change	Effective Date
Various	Changed language from non- VA sponsored conferences to Federal non-VA sponsored conferences.	CTMRO	OMB Memorandum M-17-08	December 2016
Various	Name change from Corporate Travel and Reporting Office (CTRO) to Corporate Travel Management Reporting Office (CTMRO)	CTMRO	Administrative update	December 2016
100302	Deleted VAAA authorization to bundled conferences.	CTMRO	OGC Conference Clarification Opinion (VAIQ 7713724)	December 2016
100303	Added events that are not considered a conference. Included language that if a clear-cut determination cannot be made, then the event shall be processed as a conference.		OGC Conference Clarification Opinion (VAIQ 7713724)	December 2016
100317	Changed SECVA waiver to COSVA Approval.		OMB Memorandum M-17-08	December 2016
100401	00401 Changed SECVA waiver to COSVA approval.		OMB Memorandum M-17-08	December 2016
100402	to \$500K approved thresholds to Under/Assistant Secretaries and Other Key Officials.		OMB Memorandum M-17-08	December 2016
100501.01	Incorporated new language on agencies requirements from M-17-08 and deleted old language from M-12-12.	CTMRO	OMB Memorandum M-17-08	December 2016

Section	Revision	Office	Reason for Change	Effective Date
100501.02	Updated conference approval thresholds. Added guidance for pre-approval of annual conferences.	CTMRO	OMB Memorandum M-17-08	December 2016
	Deleted bundling authority for VAAA.		OGC Conference Clarification Opinion (VAIQ 7713724)	
100501.03	Clarified content of quarterly memorandum on VA's conference policy compliance.	CTMRO	VA OIG Audit, 15-01227-129	December 2016
100501.04	Deleted bundling authority for VAAA.	CTMRO	OGC Conference Clarification Opinion (VAIQ 7713724)	December 2016
100502.01	Changed paragraph guidance from external conference oversight to Federal non-VA sponsored. Clarified that AOs must still use discretion and judgement for attendance at non-Federal conferences per FTR, Travel Policy and Government Purchase Card Policy.	CTMRO	OMB Memorandum M-17-08	December 2016
100502.02	Updated conference approval thresholds. Added guidance for pre-approval of annual conferences.	CTMRO	OMB Memorandum M-17-08	December 2016
100502.03	Removed purchase card oversight verbiage covered in Vol XVI Ch 1 and gifts and grauitites covered in Vol XIV Ch 9	CTMRO	OMB Memorandum M-17-08	December 2016
100503	Updated conference approval thresholds and removed need to elevate approval when officials attend.	CTMRO	OMB Memorandum M-17-08	December 2016

Section	Revision	Office	Reason for Change	Effective Date
1006	Added reference and link to OMB M-17-08.	CTMRO	OMB Memorandum M-17-08	December 2016
100701	Updated version of previous Volume XIV Travel - Chapter 10, "Conference Planning, Reporting, and Oversight"	CTMRO	Administrative update	December 2016
Appendix A	Incorporated conference approval threshold changes.	CTMRO	OMB Memorandum M-17-08	December 2016
Appendix B	Corrected a consistency issue on timing for review of pre-conference packages. Incorporated conference approval thresholds changes for compliance reviews.	CTMRO	Administrative update OMB Memorandum M-17-08	December 2016
1001	Added authority for OIG employees to follow OIG directives, policy, guidance; and language on VA's legal reporting requirements.	OFP (047G)	General Policy update	October 2016
1003	Added definitions: Attendee List; Bundling; and Waiver. Updated name from Covered Conference to Reportable Conference, and definition.	OFP (047G)	VA OIG Audit, 15-01227-129; General Policy Update	October 2016
1004	Added roles and responsibilities for: VA Secretary (SECVA), Deputy SECVA; CTMRO compliance review and reporting. Updated VA CFO reporting requirements;	OFP (047G)	VA OIG Audit, 15-01227-129; General Policy update	October 2016
100501	Added: Bundling policy and reporting guidance; segregation of duties; site selection documentation retention; approval guidance for conferences under \$20K	OFP (047G)	VA OIG Audit, 15-01227-129; General Policy Update	October 2016

Section	Revision	Office	Reason for Change	Effective Date
	(Table 1); re-delegation memo for conferences up to \$100K must be provided to CTMRO; attendee list must be in the Conference Oversight and Reporting Knowledgebase (CORK); CTMRO compliance review and reporting to VA CFO and VA CFO reporting.			
	Updated: Changed Responsible Conference Executive (RCE) function level requirement; Event planning and support services use of Blanket Purchase Agreements; changed applicable event and training words to read conference(s); unique sites do not require cost comparison; Updated approval levels; estimate and reporting variance to 10 percent and requirements; Instructions to Travelers; reporting requirements (Table 2); replaced use of VA Form 10008a, b, and d, with one VA Form 10008 for VA sponsored and co-sponsored conferences.			
100502	Added: Segregation of duties; guidance on payment method of registration fees to avoid split payments using the micro-purchase card. Updated: Executive	OFP (047G)	General Policy Update	October 2016
	Champion (EC) appointment and function level requirement; approval			

Section	Revision	Office	Reason for Change	Effective Date
	requirements (Table 3). Removed notifying approver if cost exceeds estimate.			
100503	Added section on submitting CP approval requests using VA's document processing system.	OFP (047G)	General Policy Update	October 2016
100504	Combined travel expenses, meals, and light refreshments in one section and updated guidance.	OFP (047G)	General Policy Update	October 2016
100505	Created Record Retention section and updated.	OFP (047G)	General Policy Update	October 2016
1007	Rescinded March 2015 Ch 10 Conference Planning, Reporting, and Oversight.	OFP (047G)	Revised Chapter	October 2016
1008	Updated Point of Contact Information	OFP (047G)	General Policy Update	October 2016
Appendix A	replaced as current App. B. Updated CP and CORK documentation requirements. Replaced use of VA Form 10008a, b, and d, with one VA Form 10008 for VA sponsored and co-sponsored conferences		General Policy Update	October 2016
Appendix B	Replaced current App. B with new Conference Compliance Procedures.	OFP (047G)	General Policy Update	October 2016

1003 DEFINITIONS

100301 Approving Official. The individual(s) authorized authority to approve a conference package based on the estimated cost of the conference.

100302 Bundling. Submitting multiple conferences, similar in nature and executed in the same fiscal year, in a single request for approval that summarizes estimated and final costs for each conference. Bundling of conferences is prohibited for VA sponsored or co-sponsored conferences but permitted for Federal non-VA sponsored conferences.

100303 Conference. 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. If a clear-cut determination cannot be made that an event is not a conference, then it must be processed under this policy as a conference. Legal counsel should be consulted for assistance in determining whether an event is a conference if there are questions. (Note: attendee travel refers to VA funded local and TDY travel)

OGC Memorandum dated October 26, 2016, "Conference Clarification", has already opined that the following events are not considered a conference:

- Veterans outreach events (e.g., sports programs)
- Traditional ceremonies (e.g., change of command, ground breaking, official military awards, and funerals)
- Events at which VA is conducting recruitment activities
- Formal classroom training coursework at established government or commercial training facilities. (e.g. Law Enforcement Training Center, and VA Acquisition Academy)

100304 Conference Package (CP). A term used to identify the required documentation for approval and reporting of VA sponsored and co-sponsored conferences (electronic or hard copy version).

100305 Employee. An appointed officer or employee of an agency, including a special Government employee. This definition also includes an individual employed intermittently in the Government service as an expert or consultant and paid on a daily when-actually-employed basis, and an individual serving without pay or at a \$1 a year.

100306 Executive Champion (EC). An individual assigned by an Under Secretary, Assistant Secretary, or Other Key Official responsible for overseeing the attendance and attendance approvals for assigned Federal non-VA sponsored conferences.

100307 Federal Travel Regulations (FTR). The FTR implements statutory requirements and Executive branch policies for travel by Federal civilian employees and others authorized to travel at Government expense.

100308 Formal Classroom Training. Training coursework at established government or commercial training facilities. (Note: does not include training held at a hotel or conference center.)

100309 Per Diem. The Lodgings-Plus method, a subsistence allowance for lodging, meals, and related incidental expenses incurred while on authorized TDY. Under the per diem method VA will reimburse the daily cost incurred by a traveler for lodging up to a maximum daily rate, and a fixed allowance for meals and incidental expenses (M&IE). Travelers are required to exclude any meal provided by the Government. Per diem rates for the TDY location are established by the General Services Administration (GSA). Reference GSA Per Diem Rates for the per diem rates in effect for a specific travel episode.

100310 Reportable Conference. Any VA sponsored or VA co-sponsored conference, meeting, or other similar forum which either costs \$20,000 or more, or costs less than \$20,000 and there are 50 or more attendees including at least one (1) or more VA employees.

100311 Responsible Conference Executive (RCE). An individual assigned by an Under Secretary, Assistant Secretary, or Other Key Official responsible for planning, obtaining required level of approval, oversight, and reporting of assigned VA-sponsored or co-sponsored conferences.

100312 Retreat. A town hall type meeting for government employees to review progress and challenges in implementing Government or Departmental policies, engaging their staff in discussing various aspects of said Government or Departmental activities. Retreats are often held off site or away from the normal duty station or office. Such a facility usually offers participants the opportunity to socialize to a greater extent than they otherwise would in the office, and to personalize relationships and gain greater appreciation of each other.

100313 Seminar. A lecture or presentation delivered to an audience on a particular topic or set of topics that are educational in nature. It is usually held for groups of 10-50 individuals. A seminar is frequently held at a hotel meeting space or within an office conference room.

100314 Symposium. A meeting of a number of experts in a particular field at which papers are presented by specialists on particular subjects and discussed with a view to making recommendations concerning the problems under discussion.

100315 Training. An activity leading to skilled behavior. Training also refers to the acquisition of knowledge, skills, and competencies as a result of the teaching of vocational or practical skills, and information that relate to specific useful competencies.

100316 Traveler. An individual as defined by the FTR who is authorized to perform official Government travel.

100317 **Traveler List.** A complete list of all VA-funded travelers, including local attendees incurring travel costs, attending a conference, including their full name, VA email address, and travel authorization or local expense voucher number (if applicable).

100318 Unique Site. The only location meeting the conference criteria that could not otherwise be met at another location.

100319 Workshop. A series of educational and work sessions. Small groups of people meet together over a short period of time to concentrate on a defined area of concern. Purposes for workshops may vary; examples include: Informing, problem solving, and training. Typically, a workshop has two components: technical, in which one presents theory in lectures and readings, and one in which one would do a project, produce a product, or write a paper.

1004 ROLES AND RESPONSIBILITIES

100401 Office of Management and Budget (OMB), Memorandum 17-08 (M-17-08), dated November 25, 2016, directs each agency to appoint an appropriate official to approve estimated spending in excess of \$500,00 on a single conference. The VA Secretary (SECVA) has designated the COSVA as the designated approving official for conferences with estimated expenses in excess of \$500,000. This authority may only be exercised when 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 approval must be documented in writing and posted to the VA Public Website.

The SECVA, or designee, is responsible for meeting the Congressional quarterly report, OIG annual report, and annual VA Public Website reporting requirements in accordance with Section 100501.03 Reporting.

100402 Under Secretaries, Assistant Secretaries, and Other Key Officials have been delegated the authority to approve conferences with estimated net expenses in excess of \$100,000 and up to \$500,000 on a single conference, and may further delegate approval authority for conferences \$100,000 and below.

100403 The Assistant Secretary for Management and Chief Financial Officer (VA CFO) oversees all financial management activities relating to the Department's programs and operations, as required by the CFO Act of 1990 and 38 U.S.C. §309, *Veterans' Benefits*.

The VA CFO specific responsibilities include the direction, management, and provision of policy guidance and oversight of VA's financial management personnel, activities, and operations. The VA CFO establishes financial policy, inclusive of travel, systems, and operating procedures, for all VA financial entities and provides guidance on all aspects of financial management.

A. The SECVA has delegated to the VA CFO the responsibility for ensuring the following reporting requirements are met:

• All VA sponsored and co-sponsored conferences in excess of \$500,000 are posted to the VA public website;

• All agency-sponsored conferences from the previous fiscal year, where the net expenses for the agency associated with the conference were in excess of \$100,000, are posted to the VA public website; and

• All reportable conferences (reference Section 100310) are reported to the Committee on Veterans' Affairs of the Senate and the Committee on Veterans' Affairs of the House of Representatives. The VA CFO has re-delegated this authority to the Deputy Assistant Secretary for Finance (DAS for Finance).

B. The VA CFO is required to report to the DEPSECVA or COSVA the results of the Corporate Travel and Reporting Office's quarterly memorandum on VA's conference policy compliance.

100404 Under Secretaries, Assistant Secretaries, CFOs, Finance Officers, Chiefs of Finance Activities, Chief Accountants, and Other Key Officials are responsible for ensuring compliance with the policies and procedures in this chapter and designating one or more persons to answer questions pertaining to the planning and oversight of conferences. For conference planning and approval, Under Secretaries, Assistant Secretaries, and Other Key Officials are responsible for:

A. Ensuring appropriate due diligence is performed;

B. Establishing internal processes, tools, procedures, and roles and responsibilities needed to comply with VA policies and the Conference Oversight and Reporting Knowledgebase (CORK);

C. Publishing supplemental processes and guidance, as applicable, to ensure program effectiveness;

D. Ensuring the business case for each VA-sponsored conference justifies the use of VA resources (funds, time, and people);

E. Appointing an RCE for VA sponsored and co-sponsored conferences;

F. Appointing an EC to manage attendance and overall approval for VA-wide employees at Federal non-VA sponsored conferences for which the Administration or Staff Offices is the main proponent;

G. Identifying purchase cardholder(s) to perform the transactions required for reportable conferences and ensuring the cardholder's approving official is aware of the designation, and has all required documentation prior to approving transactions; and

H. Establishing procedures sufficient to ensure that each RCE and EC is properly trained for their conference duties.

100405 The Office of Financial Policy (OFP), under the VA CFO's direction, provides Department-wide financial policy and guidance. OFP is responsible for developing, coordinating, issuing, evaluating, and reviewing VA's financial policies, to include those that impact financial systems, and procedures for compliance with all financial laws and regulations.

100406 The RCE is required to demonstrate responsible stewardship of public funds and compliance with VA policy in performing all administrative roles and responsibilities identified throughout this chapter. For VA sponsored and co-sponsored conferences the RCE is responsible for:

A. Developing and certifying the Conference Package (CP);

B. Obtaining proper approval of the CP (defined in Section 1005 Policies);

C. Overseeing the execution of the conference as the senior official on-site (or alternate appointee); and

D. Providing timely and accurate post conference reporting.

100407 The EC is required to demonstrate responsible stewardship of public funds and compliance with VA policy in performing all administrative roles and responsibilities for Federal non-VA sponsored conferences in accordance with Section 100502, *Federal Non-VA sponsored Conferences* in this chapter.

100408 The Office of Acquisition, Logistics, and Construction (OALC) is responsible for VA's conference procurement activities through the Heads of Contracting Activity (HCA) for VA conference sponsorship or hosting. The appropriate HCA is responsible for appointing a Contracting Officer (CO).

A. The CO will ensure negotiations are conducted and documented in accordance with the Federal Acquisition Regulations (FAR).

B. The CO will appoint the Contracting Officer's Representative (COR).

C. Only properly warranted COs can issue orders or make modifications to existing conference contracts and must complete any necessary modifications promptly. Modifications shall be made only when appropriate and within the overall spending limits identified in the conferences' s approved CP.

100409 The Corporate Travel Management Reporting Office (CTMRO), under the VA CFO's direction, is responsible for tracking, reporting, and performing oversight of reportable conferences. CTMRO is responsible for:

A. Providing guidance and assistance to the Administrations and Staff Offices for conference approval requests to ensure compliance with applicable laws, regulations, and policies;

B. Conducting the review of all conference approval documents and performing a sample audit of post conference report cost data, and reporting results to the RCE and/or the Administration or Staff Office point of contact (POC) as follows:

1. Provide weekly, a copy of the completed checklist with identified compliance issues.

2. Report monthly, the summary results of the compliance reviews previously identified to the RCE, for which no action has been taken, to the conference sponsoring/co-sponsoring Administration or Staff Office Conference POC and Senior Executives for their appropriate corrective action.

Reference *Appendix B, Conference Compliance Review Procedures* for criteria included in the review and audit plan;

C. Providing a quarterly memorandum to the VA CFO reporting on VA's conference policy compliance;

D. Tracking applicable conferences to ensure conference data elements for all reportable requirements are entered into CORK within the appropriate timeframe;

E. Delivering mandated reports:

- 1. Congressionally-mandated; and
- 2. OMB-mandated reports.

F. Working closely with OFP to ensure VA conference policies and procedures are compliant with current laws and regulations;

G. Assisting with responses to Congressional and Freedom of Information Act inquiries;

H. Managing CORK; and

I. Appointing an EC for cross-Administration and Staff Office participation at Federal non-VA sponsored conferences in the event no one Administration or Staff Office can be identified as the main proponent of the conference.

100410 Approving Officials will ensure all travel is authorized and performed consistent with the FTR, VA travel policy, and any other agency-specific guidance relating to travel issues. Additionally, they could have pecuniary liability for erroneous payments resulting from their negligent or fraudulent actions. Their responsibilities include:

A. Authorizing only official travel for travelers under their jurisdiction in advance of the travel;

B. Determining if the travel is essential for the purpose of carrying out the mission of VA;

- C. Ensuring adequate funds are available before authorizing travel;
- D. Ensuring all travel is performed in the most economical and effective manner;

E. Ensuring VA's electronic travel system (ETS) is used to prepare, process, approve, and route travel authorizations and expense vouchers for official temporary duty travel (TDY), (including when travelers are making their own transportation and lodging reservations);

F. Examining expense reports to ensure:

1. The justification, documentation of the conference date, and receipts are attached;

- 2. Travel expenses for which reimbursement is claimed were made as authorized.
- G. Ensuring travelers under their jurisdiction:
 - 1. Complete VA Form 10091, VA-FSC Vendor File Request Form and fax to VAFSC Vendorizing Team using the number indicated on the form in order to receive travel advances and reimbursements electronically;
 - 2. File expense reports with electronically attached receipts; and
 - 3. Comply with the travel card program guidelines.

H. Approving requests based on the established conference oversight and approval threshold under Section 100501.02 for VA sponsored and co-sponsored conferences, and Section 100502.02 for Federal non-VA sponsored conferences, in this chapter.

100411 Travelers will:

A. Be knowledgeable of the FTR, VA travel policy, and any other agency-specific guidance related to travel and conference issues;

B. Minimize costs of official travel by exercising the same care when incurring expenses that a prudent person would exercise if on personal travel and expending personal funds. Excess costs, circuitous routes, delays, or luxury accommodations and services that are not necessary or justified in the performance of official business are not acceptable under this policy. Travelers are responsible for excess costs incurred for personal preference or convenience;

C. Ensure travel is authorized by the approving official prior to departure;

D. Arrange travel using VA's ETS, including reservations for transportation, lodging, and rental vehicles;

E. In the event that travel plans change and conference attendance is cancelled:

1. Cancel transportation and lodging reservations in a timely manner;

2. Seek a refund of the registration fee and repay VA with any refund received if an advance was paid; and

3. Repay VA if no refund is made and failure to attend is due to inexcusable reasons.

F. Claim and obtain, where applicable, lodging tax exemptions. See U.S. General Services Administration (GSA) SmartPay website for applicable locations and use certificates granted by the locality;

G. Submit claims for expense reimbursement within five business days upon return to the official station. For travelers in an extended travel status (more than 30 days), submit expense reports monthly. For local expense reports, submit at least quarterly; and

H. Comply with VA's Travel Charge Card Program guidance contained in Vol XVI Ch 2, *Government Travel Charge Card Program*.

1005 POLICIES

100501 VA SPONSORED AND CO-SPONSORED CONFERENCE PLANNING, APPROVAL, OVERSIGHT, AND REPORTING.

100501.01 Planning.

A. OMB Memorandum M-17-08 requires agencies to ensure that Federal funds are used only for necessary and appropriate purposes and that all conference expenses and activities comply with both the Federal Travel Regulation (FTR) and the Federal Acquisition Regulation (FAR) requirements on lodging, food and beverages, per diem reimbursement, and contracting of goods and services. In addition, agencies should ensure that conference attendance and expenses are appropriate to the purpose of the conference and the mission of the agency.

B. Appointing an RCE. Under Secretaries, Assistant Secretaries, and Other Key Officials may delegate to their executives the authority to appoint an employee, known as the RCE, to plan, certify the CP, obtain required level of approval, execute, and report on VA-sponsored or co-sponsored conferences. The RCE function must be at an appropriate general schedule level to exercise sufficient oversight of the conference.

The RCE is tasked by the responsible organization to assure there is appropriate management oversight of the conference planning process to ensure the standards for determining the best value are met. In the event the designated RCE is unable to continue executing their duties, a memorandum appointing the replacement RCE and the effective date must be uploaded into CORK.

C. Conference Package Development. The RCE will:

1. Update CORK with all conference title information no later than 15 calendar days prior to the beginning of the next fiscal quarter. This update must ensure that the next quarter's planned conference titles and estimates are as refined as possible. The update must also include any additional conferences that have been planned, and a status change for any conferences that have been cancelled.

2. Develop a CP for all VA sponsored and co-sponsored conferences and complete all required forms for conference approval (reference FTR Appendix E to Chapter 301, Suggested Guidance for Conference Planning);

3. Estimate all applicable conference costs listed in VA Form 10008, Conference Request Form. Only expenses incurred using appropriated funds are to be included. Total conference cost estimates should include all direct and indirect expenses paid by VA.

4. Exercise strict fiscal responsibility in determining the best value for a conference site in accordance with FTR §301-74.1(a). Per Diem estimates will be based on GSA Per Diem Rates for the locality found at the GSA Website. Attendance will be

a reasonable estimate of participants based on anticipated interest, ensuring VA representation is limited to the minimum number of attendees determined necessary to accomplish the purpose of the conference, and include estimated costs for late additions, as presenters and other attendees, which are likely to occur after conference approval;

5. Ensure conferences do not include entertainment costs. Reference Vol II *Ch 4, Awards, Ceremonies, Food and Refreshments, Gifts or Mementos*;

6. Not accept individual gifts unless authorized under the ethics regulations (FTR §301-74.1(d)). Gifts that are prohibited include travel and lodging for site visits used for familiarization of a potential conference site, or under other circumstances. Consult the Office of General Counsel (OGC) Ethics office to clarify what may or may not be accepted should VA be offered special rates or benefits and include guidance provided by OGC in the CP;

7. Include costs for all necessary conference-related site visits;

8. Obtain specific approval for the cost of lodging, meals, or light refreshments as described in Section 100504;

9. Not approve the CP in which they are performing the certification function, as there must be a separation of duties between the RCE and the Approver; and

10. Review and certify the CP is in compliance with regulations and policy, and route for approvals as required in Table 1: VA Sponsored and Co-Sponsored Conference Approval Thresholds in this chapter. Electronically captured and digitally verified signatures are acceptable on all CPs and reporting forms. Reference Appendix A, Conference Package Related Forms for CP required forms and the VA Conference Resource Home website for form instructions and examples of sample CPs.

D. Site Determination.

1. The RCE must analyze estimated conference expenditures for different sites to determine which site would provide the overall best value to the Government. This analysis is referred to as performing a site cost comparison (FTR §301-74.5). VA sponsored and co-sponsored conferences shall maximize the use of Government-owned or Government-provided conference facilities to the extent practicable (FTR §301-74.1(b)), considering such factors as availability, suitability, per diem, transportation, and rental of conference rooms (reference paragraph E. Requirements for Documenting Site Selection for additional guidance). When selecting a site for a VA sponsored or co-sponsored conference the RCE will (FTR §301-74.3):

a. Consider alternatives to a face-to-face conference, such as teleconferencing, before making any firm commitment on a physical location;

b. Identify opportunities to reduce costs in selecting a particular conference location and facility (e.g., through the availability of lower rates during the off-season at a site with seasonal rates (FTR §301-74.1(c));

c. Evaluate cities and venues based on the various factors as outlined in FTR Appendix E to Chapter 301 – Suggested Guidance for Conference Planning;

d. Conduct a site cost comparison (FTR §301-74.4) for the size, scope, and locations of the proposed conference using VA Form 10008. When a unique site is required, a site comparison is not needed. Instead, the costs and justification for the unique site must be provided in the site selection rationale/notes section of the VA Form 10008 or in the approval memorandum; and

e. Ensure documentation of all alternative sites considered or unique site justification are retained in accordance with <u>Section 100505</u> in this section.

2. Minimizing costs is a critical consideration in determining when to use an event planning and event support services (EPESS) Blanket Purchase Agreement (BPA), in accordance with the Chief of Staff Memorandum. In general, the use of contract event planners is not advantageous because it can reduce VA's control over conference expenses and can increase costs. The RCE should consult with the CO in order to determine if internal VA support services would provide the best value to the VA. If circumstances make the use of a conference planner necessary, the contract with the planner must cover only the planning and logistical support provided by that vendor. For conference planning and support, VA developed a comprehensive Customer Ordering Guide to assist VA offices in preparing required documentation to order EPESS. Warranted COs may place orders against an EPESS BPA by following the electronic contract management system procedures detailed in the guide.

Administrations and Staff Offices are permitted to use internal VA event planning support services and a la carte contracts for event support services, instead of an EPESS BPA; however, all a la carte event support services must be contracted through a warranted CO for all other conference-related expenses, in accordance with the FAR. The use of third-party contract planners does not eliminate the requirement for reporting total conference costs.

All proposed contracts for conferences where VA's commitment, expenditure, and liability combined exceed \$25,000, require legal review by the Office of General Counsel (OGC) and technical review by Acquisition Assistance Division or Acquisition Program Management Division staff prior to signature by a CO.

3. For conferences held in the District of Columbia, VA may <u>not directly</u> procure group lodging facilities for conference attendees without specific approval and appropriation from Congress. However, FTR §301-74.12(a) does not prohibit payment of per diem to an employee authorized to obtain lodging in the District of Columbia while performing official business travel.

4. While it is always desirable to obtain lodging consistent with the established lodging portion of the per diem rate for the chosen locality, it may not always be possible. In instances when lodging is not available at the established per diem rate, travelers must construct a cost comparison between all of the associated costs, including the daily round-trip ground transportation costs to a lodging facility that meets the applicable per diem rate, and the cost of the actual expense method at the conference locality as prescribed of Vol XIV Ch 2, *Travel Per Diem*.

5. Once the site is selected, the RCE will ensure written documentation of the evaluation criteria and the selection rationale used (FTR §301-74.14) is retained in accordance with Section 100505 in this chapter.

E. Requirements for Documenting Site Selection. To document and justify the selected site, whether comparing any combination of government owned and non-government owned facilities, a three (3) site cost comparison must be conducted to ensure that the conference will be held in the most economical location while achieving the objectives of the conference. Site cost comparisons are not required when a conference is held for a specific purpose which requires a unique site that could not otherwise be met at another location.

Although Government facilities must first be considered when comparing locations, it is not considered a unique site, unless it is documented as the only location meeting the conference criteria. When a unique site is selected, in lieu of a site cost comparison, the costs and justification must be provided on the VA form 10008 site selection rational/notes section and in the approval memorandum.

Administrations and Staff Offices are responsible for conducting market research and determining customers' needs. A contracting officer (CO) may be able to provide suggestions or guidance based on previous experience to assist in finding the most cost-effective conference facility. Reference FTR Appendix E to Chapter 301 – Suggested Guidance for Conference Planning, for recommended guidance along with other factors to be considered when a conference is being developed.

100501.02 Approval.

Approval authorities vary depending on the estimated cost of the conference. Reference the table below:

 Table 1: VA Sponsored and Co-Sponsored Conference Approval Thresholds

Costs to VA	Certification	Recommendation for Approval	Approval
x ¹ < \$20K and < 50 Attendees	Not Required	Knowledgeable employee from requesting office	Determined by Sponsoring Administration or Staff Office Internal Policy
x ¹ < \$20K w/50+ Attendees OR \$20K ≤ x ¹ ≤ \$100K	RCE	RCE	Delegated to the Under/Assistant Secretaries and Other Key Official, who may further delegate
\$100K < x ¹ ≤ \$500K	RCE	RCE	Delegated to the Under/Assistant Secretaries and Other Key Official, without further delegation
x ¹ > \$500K	RCE	Under/Assistant Secretaries or Other Key Official	VA Chief of Staff (COSVA)

x equals total estimated cost of the conference

A. Estimated Cost is < \$20,000. Conference packages estimated to cost less than \$20,000 with less than 50 attendees must have CPs prepared and approved in accordance with the sponsoring Administration or Staff Office internal policy.

B. Estimated Cost is \$20,000 - \$100,000. Under Secretaries, Assistant Secretaries, and Other Key Officials have been delegated the authority by the SECVA to approve CPs for conferences with estimated costs less than \$20,000 with 50 or more attendees (one or more of whom is a VA employee), or for conferences with estimated costs between \$20,000 and \$100,000. This authority may be re-delegated. <u>A copy of the Re-delegation of Authority Memorandum signed by their respective Under Secretary, Assistant Secretary, or Other Key Official must be provided to CTMRO.</u> CTMRO will use this to verify that the person signing a CP has been delegated this authority. The following documents must be submitted in the request:

a. A conference approval request memorandum to be signed by the authorized Approving Official;

b. VA Form 10008, Conference Request Form.

Reference Appendix A, Conference Package Related Forms for additional routing documents required to submit a CP.

C. Estimated Cost is > \$100,000 - \$500,000. Under Secretaries, Assistant Secretaries, and Other Key Officials have been delegated the authority by the SECVA to approve CPs for conferences with estimated costs greater than \$100,000 up to \$500,000. This authority may not be further delegated. The following documents must be submitted in the request:

a. A conference approval request memorandum to be signed by the authorized Approving Official;

b. VA Form 10008, Conference Request Form.

Reference Appendix A, Conference Package Related Forms for additional routing documents required to submit a CP.

D. Estimated Cost is > \$500,000. Under Secretaries, Assistant Secretaries, and Other Key Officials must submit a CP for conferences costing in excess of \$500,000 to the COSVA for approval.. CPs should be submitted no later than 45 calendar days prior to the date funds are to be obligated, or no later than 70 calendar days prior to the start of the conference, whichever is earlier. The COSVA's written approval is required before VA can incur any conference obligations. The following documents and any supporting information must be submitted in the CP:

a. A conference approval request memorandum signed by the Under Secretary, Assistant Secretary, or Other Key Official; and

b. VA Form 10008, Conference Request Form.

Reference Appendix A, Conference Package Related Forms for additional routing documents required to submit a CP.

E. Bundling of conferences is prohibited.

F. Approving officials are authorized to provide one-time approval for recurring VA sponsored or hosted conferences (e.g., annual conferences) within the overall limits of their approval authority. Approvals should be documented and will include control conditions based on historical execution of these events. Such conditions should include, but not be limited to, cost limits; event durations; maximum attendance; and location restrictions. The actual conference execution is still subject to annual reporting requirements, must be documented in CORK, and subject to the availability of funding.

100501.03 Oversight.

A. VA is committed to accurately tracking appropriated funds for VA-sponsored or cosponsored conferences and ensuring appropriate internal controls are in place.

B. Under Secretaries, Assistant Secretaries, and Other Key Officials must ensure their budget officers are fully integrated into the decision process to ensure fiscal discipline.

C. The RCE is responsible for ensuring proper stewardship of government funds during the execution of the conference and ensuring the conference complies with applicable statutes, regulations, and policies. The RCE will:

1. Ensure costs incurred are documented and total expenses do not exceed the approved estimated costs;

2. Ensure all approvals and CP documentation is uploaded into CORKin order to support the conference approval decision and for future audit purposes (reference *Appendix A, Conference Package Related Forms*). This includes:

- VA form 10008, Conference Request Form,
- A list of travelers full name, VA email address, travel authorization or local expense voucher number, ensuring not to include any personally identifiable information (PII);
- A list of all contract numbers associated with the conference; and
- All other documentation supporting costs, justifications, and any specific expense approval documents.

3. Notify the approving authority, prior to conference execution, if budgetary thresholds are crossed or require additional approval; for example:

• If an approved CP is determined to exceed the approved estimate by ten percent or more prior to execution of the conference, a re-approval of the CP is required. If the revised estimate requires a higher level of approval authority, revised CP documents must be signed by the required level of approval authority, otherwise a summary memorandum signed by the original approval authority is sufficient;

• If the final cost of an conference exceeds the approved estimate by ten percent or more, justification for the increase in the final cost must be provided to and approved by the required level of approval authority identified in Table 1: VA Sponsored and Co-Sponsored Conference Approval Thresholds; or

• If the final cost per attendee increases by ten percent or more as compared to the estimated cost per attendee, the RCE must provide justification for the cost increase and provide written notification to the official who approved the original CP. The Approving Official must acknowledge receipt of the notification by signing and dating the document.

Should a review of estimates, final costs, or cost per attendee result in a ten percent or more increase, the RCE must upload all subsequently obtained approval or signed notification documents, including all supporting justifications, into CORK.

4. Exercise due diligence during the execution of a conference (e.g., expenses incurred have prior approval, and use of purchase cards complies with policy);

5. Inform all employees involved with the conferences of prohibitions against soliciting or receiving any gifts or gratuities from outside entities. Reference Vol XIV Ch 9, Non-Federal Source Funding (Donated Travel), for guidance. RCE should consult with OGC (Ethics) for advice;

6. Issue "Instructions- to-Travelers" (ITT) in a timely manner to all conference attendees. The ITT will provide FTR and VA Policy guidance to include, but not limited to the following:

a. Conference name, dates, location, name, and point of contact for questions;

b. Registration and payment method instructions for registration fees (when applicable) to ensure improper payments do not occur, e.g. micro-purchase card split payments on a known requirement (reference Vol XVI Ch 1, Government Purchase Card Program);

c. Remind all employees not to accept individual gifts unless authorized under the ethics regulations;

d. Travel funding information;

e. Guidance on common types of travel expenses travelers might incur for inclusion on the TA, e.g., TDY travelers versus Local travelers;

f. Identify documentation requirements on the TA, e.g., attach the ITT, VA Form 10079 cost comparison guidance when choosing to use a privately-owned vehicle instead of the Government preferred mode of transportation (FTR §§301-10.4 and 301-10.5), or VA Form 10079a personal travel in conjunction with TDY when the employee chooses an indirect route, rental car at TDY location in lieu of alternative ground transportation, etc.;

g. Lodging reservation information and include guidance if lodging is not available at the per diem rate at the conference site (FTR §301-74.6);

h. Identify if hotel tax exemption is applicable at the conference site, providing forms or required documentation;

i. Reduction of meals from M&IE, when meals are provided by, or included in the registration fee paid for by the government;

j. Provide copies of the signed approval memorandum authorizing lodging, meals, or both for local travelers and the requirement to attach the memo to their travel authorization; and k. Expense voucher instruction, e.g. time limit on filing and identify expense voucher receipt requirements (reference Vol XIV, Ch 1, Travel Administration, Appendix I, Receipt Requirements), and any other receipts identified in advance by the Approving Official.

7. Identify and clearly communicate all conference requirements to the CO for contract issuance. A warranted CO will be responsible for the acquisition of services and supplies over \$3,500 to ensure acquisitions in support of conferences are planned and managed in accordance with the FAR;

8. Ensure VA does not solicit lodging accommodation upgrades as part of contracts. The CO must obtain a technical and legal review of all proposed contracts with hotels or similar facilities for conferences where VA's cost may exceed \$25,000;

9. Ensure VA does not incur expenditures for the use of entertainment (videos, music, etc.), motivational speakers, the purchase of promotional items, or embossing, or otherwise imprinting, the name of the organization or conference on any supplies, mementos, or other handouts;

10. Ensure the CO or government purchase cardholder makes all purchases within the limits of their individual authority, and only authorized contracting personnel make commitments or changes that affect price, quality, quantity, delivery, or other terms and conditions of a contract;

11. Ensure purchases are made with appropriate approval. Above the micropurchase limit of \$3,500, the CO determines the best vehicle for purchases. At or below \$3,500, the RCE must designate a purchase cardholder to perform the transaction, ensure the cardholder's approving official is aware of the designation, and has all required documentation prior to approving transactions. The purchase cardholder must have RCE approval prior to purchase. Reference Vol XVI Ch 1, *Government Purchase Card Program*, regarding the cardholder's responsibilities (i.e. prohibiting split payment of a single requirement), and the approving official's responsibility to certify all transactions made by cardholders, and to ensure applicable documentation is maintained in accordance with Section 100505 in this chapter;

12. Nominate a qualified COR for conferences;

13. Serve as the senior official on-site during the execution of the conference. However, the RCE may delegate, to an appropriately qualified person, the duties of on-site oversight;

14. Update CORK should there be any conference changes or cancellation;

15. Determine appropriate on-site conference support personnel before, during, and after a conference. These individuals are identified by name and the designation must be provided to these travelers for inclusion in their travel receipts; and

16. Ensure that employees and supervisors involved in conference oversight complete all mandatory and applicable training, which includes mandatory annual VA-approved ethics training and travel card training (TMS ID#5508). For Purchase Card Holders, purchase card training (TMS ID#5863) is required as described in Vol XVI Ch 1, *Government Purchase Card Program*, and for travel cards reference Vol XVI Ch 2, *Government Travel Charge Card Program*.

- D. CTMRO will perform an on-going compliance review on:
 - 1. All approved conferences, prior to the conference being held, to ensure RCEs have complied with all policy requirements identified in section 100501.03C; and
 - 2. A sample of all conferences post completion.

The detailed results of these compliance reviews are provided monthly to the RCE and applicable Administration or Staff Office conference management points of contact. CTMRO will provide guidance to address any issues related to compliance with VA conference policies and procedures. Reference *Appendix B, Conference Compliance Review Procedures*.

CTMRO will provide the results in a quarterly memorandum to the VA CFO on any outstanding compliance findings. The VA CFO will report to the DEPSECVA or COSVA the results of CTMRO's quarterly memorandum on VA's conference policy compliance. The memorandum will summarize by Administration and Staff Office compliance review results. For conferences that did not comply with policy, the memorandum will identify whether these conferences are applicable to the current quarter or were identified in the prior quarter. In addition, the memorandum will identify those conferences for which the Administration or Staff Office have taken no action to address identified non-compliance.

100501.04 Reporting.

A. After the conference takes place, the RCE will:

1. Prepare the VA Form 10089b, Responsible Conference Executive (RCE) Post-Conference Certification Form_(PCCF) and the 10089a, Final Conference Report (FCR) identifying estimated-versus-actual costs (only including expenditures of appropriated funds), and include previously provided justifications and any reapproval. If the actual cost exceeds the approved estimate by ten percent or more, or the final cost per attendee increases by ten percent or more over the estimated cost per attendee, reference Section 100501.03C4 for the required actions. 2. Submit the PCCF within 15 calendar days of conference conclusion. This can be accomplished by either entering the information in CORK or by uploading the signed hard copy of the PCCF in CORK.

3. Submit a complete FCR within 45 calendar days of conference conclusion. This can be accomplished by entering the cost data in an FCR in CORK. Incomplete FCRs submitted in CORK will have an adverse effect, resulting in VA providing inaccurate information to Congress, OIG, and on VA's public website.

4. Ensure the final travel costs reported only include costs incurred for the specific conference. A TA may include more than one mission, but only the conference expense portion of the TA must be included in costs reported for the conference.

B. CTMRO uses CORK to generate quarterly reports on reportable conferences to Congress, an annual report to the OIG, and to annually post on VA's Public Website on conference expenditures over \$100,000.

Costs to VA	Frequency of Statutory Reporting	Reported to	Time Frame for Statutory Reporting	Frequency of Posting Requirement	Time Frame for Posting Requirement
x ¹ < \$20K and < 50 attendees	N/A	N/A	N/A	N/A	N/A
x ¹ <\$20K and ≥ 50 attendees, including 1+ from VA ²	Quarterly	Congress	NLT 30 calendar days after the end of the fiscal quarter ²	Posting not required	Posting not required
x ¹ ≥ \$20K	Quarterly	Congress	NLT 30 calendar days after the end of the fiscal quarter ²	Posting not required	Posting not required
x ¹ ≥ \$20K ³	As it occurred	Inspector General	NLT 15 calendar days after the end date of the conference ³	Posting not required	Posting not required
x ¹ > \$100K ⁴	Annually	Public Website ⁴	NLT January 31, following the close of each fiscal year	Annually	January 31
x ¹ > \$100K ^{3, 5}	Annually	Inspector General ³	None ⁵	Annually ⁵	January 31 ⁵

Table 2: VA Sponsored and Co-Sponsored Conference Reporting

¹ x equals total estimated cost of the conference

² 38 U.S.C. §517

³ P.L. 114-113 Division E, Title VII, § 739

⁴ OMB Memorandum 12-12

⁵ No statutory time requirement for reporting conferences >\$100K to OIG, rather it is a VA time frame.

C. Reports to Congress.

1. Not later than 30 calendar days after the end of each fiscal quarter, VA provides a quarterly report on reportable conferences to the Committee on Veterans' Affairs of the Senate and the House of Representatives as depicted in Table 2 above.

2. Reports to Congress shall include total estimated costs to VA for conferences occurring during the fiscal quarter in which the report is submitted, and an accounting of the final costs to VA for each conference occurring during the previous fiscal quarter. The report must include reportable costs in accordance with 38 U.S.C. §517.

D. Reports to Inspector General.

1. To comply with P.L. 114-113, "2016 Omnibus Appropriations Bill" Division E, Title VII Sec 739, personnel from VA's OIG have access to CORK to view information about conferences that have been completed. The RCE uses CORK to record post-conference data elements.

2. VA submits an annual report to the OIG for conferences in excess of \$100,000. The report must include reportable costs in accordance with P.L. 114-113 Division E, Title VII, § 739.

E. Reports on VA's Public Website.

1. To comply with OMB M-12-12, VA reports on the VA public website by January 31 for each conference sponsored by VA during the prior fiscal year, where U.S. Government appropriated funds were expended in excess of \$100,000. The report must include reportable costs in accordance with OMB Memorandum 12-12.

2. The website must include all COSVA approvals identifying the exceptional circumstances for any instance where conference net expenses exceeded \$500,000.

3. The website includes information about fiscal year conference net expenses, as well as a general report about conference activities throughout the fiscal year.

100502 FEDERAL NON-VA SPONSORED CONFERENCES PLANNING, APPROVAL, OVERSIGHT, AND REPORTING.

100502.01 Planning. OMB Memorandum M-17-08 removed oversight requirements for VA attendance at non-Federal conference. However, VA approving officials must still exercise discretion and judgment in ensuring that all conference expenses are appropriate, necessary, and managed in a prudent manner in accordance with FTR, Vol

XIV Travel Policy, and Vol XVI Ch 1, Government Purchase Card Program. The guidance below does not apply to VA attendance at non-Federal conferences.

Under Secretaries, Assistant Secretaries, and Other Key Officials may delegate the authority to appoint an Executive Champion (EC). The EC's primary function is overseeing the attendance and the attendance approvals of assigned Federal non-VA sponsored conferences. The EC function must be at an appropriate general schedule level to exercise sufficient oversight of the conference. The Administration or Staff Office may designate administrative support agents for the EC. In the event the appointed EC is unable to continue executing their duties, a replacement must be appointed.

CTMRO will appoint an EC for cross-Administration and Staff Office participation at Federal non-VA sponsored conferences in the event no one Administration or Staff Office can be identified as the main proponent of the conference.

100502.02 Approval. Approval includes preparation, routing, and approval of request for Federal non-VA sponsored conference attendance, including the development of the business case and guidance for attendee travel and oversight. Approval authorities vary depending on the estimated cost of the conference as follows:

Costs to VA	Certification	Recommend for Approval	Approval
x ¹ ≤ \$100K	EC	EC or an administrative support agent	Delegated to the Under/Assistant Secretaries and Other Key Official, who may further delegate
\$100K < x ¹ ≤ \$500K	EC	EC or an administrative support agent	Delegated to the Under/Assistant Secretaries and Other Key Official, without further delegation
x ¹ > \$500K	EC	Under/Assistant Secretaries or Other Key Official	VA Chief of Staff (COSVA)

Table 3: Federal non-VA sponsored Conference Approval Thresholds

¹ x equals total estimated cost of the conference

A. Estimated Cost is \leq \$100,000. For conferences with estimated costs less than or equal to \$100,000, the Under Secretaries, Assistant Secretaries, and Other Key Officials have been delegated authority to approve Federal non-VA sponsored conferences by the SECVA, and may re-delegate this authority. A copy of the Re-delegation of Authority Memorandum signed by their respective Under Secretary, Assistant Secretary, or Other Key Official must be available upon request for audit pruposes. The following documents must be included in the approval request:

1. A conference approval request authorized by the Approving Official; and

2. Either include a completed VA Form 10090a, *Federal Non-VA sponsored (External) Conferences Approval Plan*, or include the following information:

- a. Fiscal quarter;
- b. Sponsoring office;
- c. Hosting organization;
- d. Total estimated costs of all Federal non-VA sponsored conferences in the previous fiscal year;
- e. Conference title;
- f. Known or estimated date;
- g. Location;
- h. Projected number of attendees;
- i. Estimated travel costs;
- j. Estimated registration fees; and
- k. Estimated total cost for maximum VA funding requested.

B. Estimated Cost is > \$100,000 - \$500,000. Under Secretaries, Assistant Secretaries, and Other Key Officials have been delegated the authority by the SECVA to approve attendance at Federal Non-VA sponsored conferences with estimated costs greater than \$100,000 to \$500,000. This authority may not be further delegated. The Under Secretaries, Assistant Secretaries, and Other Key Officials must submit VA Form 10090a, Federal Non-VA sponsored (External) Conferences Approval Plan, no later than 70 calendar days prior to the start of the first scheduled conference. Any emergent conference not previously included on the originally submitted VA Form 10090a, require a new VA Form 10090a. The bundled conference request list (VA Form 10090a) must include the following data elements identified in paragraph A2 above.

C. Estimated Cost is > \$500,000. COSVA's approval is required before VA can incur any conference obligations over \$500,000. For Federal non-VA sponsored conferences with estimated costs over \$500,000, the EC will prepare, for COSVA signature, the individual conference approval memorandum signed by the Under Secretary, Assistant Secretary, or Other Key Official. The approval request must include the data elements identified in paragraph A2 above, and any supporting information to justify the exceptional circumstances whereby spending in excess of \$500,000 on a single conference is the most cost-effective option to achieve a compelling purpose.

Reference Appendix A, Conference Package Related Forms for additional routing documents required to submit a request.

D. Approval officials are authorized to provide one-time approval for recurring Federal non-VA sponsored conferences (e.g., annual conferences) within the overall limits of their approval authority. Approvals should be documented and will include control conditions based on historical execution of these events. Such conditions should include, but not be limited to, cost limits; event durations; maximum attendance; and location restrictions. The actual conference execution is still subject to annual reporting requirements and subject to the availability of funding.

E. The EC is responsible for securing the proper administrative approvals for attendance of VA employees at Federal non-VA sponsored conferences. There must be a separation of duties between the EC and approver, therefore an EC may not be the approver on the same conference (reference *Table 3, Federal non-VA sponsored Conference Approval Thresholds*).

100502.03 Oversight. The EC will:

1. Ensure the proper approval for each conference is obtained as defined in Table 3, Federal non-VA sponsored Conference Approval Thresholds;

2. Notify the approving authority, prior to conference execution, if budgetary thresholds are exceeded or require additional approval;

100502.04 Reporting. While Congressional, OIG, and VA Website reporting of Federal non-VA sponsored conferences is not required by law, the Administrations and Staff Offices are responsible for ensuring a final list of approved attendees is available upon request.

100503 SUBMITTING CONFERENCE APPROVAL REQUESTS.

All conferences must be approved in accordance with Section 100501.02 for VA sponsored and co-sponsored conferences, or Section 100502.02 for Federal non-VA sponsored conferences, in this chapter. CPs requiring approval from the COSVA are to be submitted to the Office of the Executive Secretary using VA's document processing system. VA employees traveling to conferences outside the United States must comply with Vol XIV – Ch 6, *International Travel*, if applicable.

100504 TRAVEL EXPENSES, MEALS, AND LIGHT REFRESHMENTS.

100504.01 Minimizing Travel Costs. VA approving officials will limit the authorization and payment of travel expenses to those that are necessary to accomplish the purpose of the conference. All conference travel will be performed in the most economical and effective manner and in accordance with the FTR and VA's travel policy chapters in Vol XIV *Travel.* Actual Expense requires approval and reimbursement in accordance with *Vol XIV Ch 2, Travel Per Diem.*

100504.02 Transportation. Travelers may reference Vol XIV Ch 1, *Travel Administration*, and *Ch 3, Transportation Expenses* for guidance specific to their transportation needs.

100504.03 Lodging. Travelers may refer to Vol XIV Ch 2, *Travel Per Diem* for guidance on lodging authorization and reimbursement. Local travel lodging is only authorized under Government Employees Training Act (GETA), (5 U.S.C. 4109). Reference Vol XIV Ch 7, *Local Travel*, for authorization of local travel lodging under GETA.

100504.04 Light Refreshments or Meals at Conferences. VA may provide light refreshments (FTR 301-74.7) or meals at an approved conferences in accordance with Vol II Ch 4, *Awards, Ceremonies, Food and Refreshments, Gifts or Mementos; Appendix A, Food or Refreshment and Gala Purchases.* Light refreshments and meals may only be provided when all attendees are in a travel status, unless specifically authorized for local attendees under GETA (5 U.S.C. 4109). Reference Vol XIV Ch 7, *Local Travel* for approval requirements when providing refreshments or meals to attendees in their local area. For guidance on reimbursement for the cost of an occasional meal while attending a meeting in the local area, reference Vol XIV Ch 2, *Travel Per Diem.*

When authorizing light refreshments and meals the approving official must be conservative in the expense estimates in accordance with policy. RCE's are encouraged to consider contracting for approved meals as part of the conference, in lieu of VA reimbursing each traveler.

100504.05 Meals and Incidental Expenses (M&IE) When Attending a Conference.

When a meal will be furnished by the Government at a conference or the cost is included in a conference registration fee which the Government pays or reimburses to an employee, the employee is responsible for ensuring all meals provided are deducted from M&IE on the travel authorization, or in the absence of advance knowledge, on the expense voucher (FTR §301-74.21 and §301-11.18). A continental breakfast, when provided by the Government, constitutes a reduction of breakfast from M&IE. The provision of Government provided light refreshments or complimentary snacks does not require a reduction to M&IE as these are not considered a "meal."

For further guidance on M&IE, or on reimbursement of meals when in the local area reference *Vol XIV Ch 2, Travel Per Diem*.

100505 RECORD RETENTION.

Approved CPs, required forms in accordance with *Appendix A, Conference Package Related Forms*, and all associated supporting documents must be retained for six years in accordance with National Archive and Records Administration (NARA) guidelines, and available for inspection by OIG or other interested parties, as requested. Administrations or Staff Offices are responsible for ensuring record retention requirements are met for any aforementioned document which is not retained in a mechanized system.

1006 AUTHORITIES AND REFERENCES

100601 5 U.S.C. 4109 Government Employees Training Act (GETA)

100602 5 CFR §410.404, "Determining if a conference is a training activity"

100603 Public Law (P.L.) 112-154 "Honoring America's Veterans and Caring for Camp Lejeune Families Act of 2012," Sec. 707 (Title 38 United States Code (U.S.C.) Sec. 517 effective October 1, 2012)

100604 2016 Omnibus Appropriations Bill, Public Law 114-113, Division E, Title VII, Sec 739

100605 38 U.S.C. §517, Quarterly Reports to Congress on Conferences Sponsored by the Department

100606 OMB M-12-12, Promoting Efficient Spending to Support Agency Operations

100607 5 U.S.C. Part III, Subpart D, Chapter 57, "Travel, Transportation, and Subsistence"

100608 38 U.S.C. §7411, "Full-time Board-certified Physicians and Dentists: Reimbursement of Continuing Professional Education Expenses"

100609 38 U.S.C. §7471, "Designation of Regional Medical Education Centers"

100610 CFO Act of 1990

100611 38 U.S.C. §309, Veterans' Benefits

100612 41 CFR Chapters 300-304, Federal Travel Regulations (FTR)

100613 Federal Acquisition Regulation

100614 Office of Management and Budget (OMB) Memorandum M-12-12, "Promoting Efficient Spending to Support Agency Operations"

100615 OMB M-11-35, "Eliminating Excess Conference Spending and Promoting Efficiency in Government"

100616 Executive Order 13589, "Promoting Efficient Spending"

100617 FTR Bulletin 14-02, "Clarification of Agency Reporting Requirements for Conferences"

100618 Vol II, Ch 4, "Awards, Ceremonies, Food or Refreshments, Gifts or Mementos"

100619 Vol XIV, "Travel"

100620 Vol XVI, "Charge Card Programs"

100621 VA Conference Resource Home

100622 OMB M-17-08 Amending OMB Memorandum M-12-12, Promoting Efficient Spending to Support Agency Operations

1007 RESCISSIONS

100701 VA Financial Policies and Procedures, Volume XIV Travel - Chapter 10, "Conference Planning, Reporting, and Oversight", December 2016.

1008 QUESTIONS

Questions concerning these financial policies and procedures should be directed to the appropriate office mailbox below:

VHA VBA NCA VACO Staff Offices CTMRO VACOCGE@va.gov TRAVEL.VBACO@va.gov NCABudgetService@va.gov TravelPolicy@va.gov VACTROInbox@va.gov

APPENDIX A: CONFERENCE PACKAGE RELATED FORMS

Please review VA Conference Resource Home intranet page for conference related forms procedures not covered in this chapter.

A. VA Sponsored and Co-Sponsored Conference Forms.

1. RCE must submit the following standard CP forms to the authorized Approving Official for VA-sponsored and co-sponsored conferences with estimated costs of \$20,000 up to and including \$500,000, or when estimated costs are less than \$20,000 but have 50 or more attendees of which at least one (1) is a VA employee. All documents must be uploaded into CORK:

a. A conference approval request memorandum signed by the authorized Approving Official; and

b. VA Form 10008, Conference Request Form.

In addition, the following documentation must be uploaded into CORK, but is not required to be included in the CP:

c. A list of all travelers (including full name, VA email address, travel authorization or local expense voucher number, do not include any PII); and

d. A list of all contract numbers associated with the conference.

If the approval authority has been re-delegated, a copy of the Delegation of Authority Memorandum signed by the respective Under Secretary, Assistant Secretary, or Other Key Official must be provided to CTMRO in advance of submitting the CP for approval, but is not required to be included in the CP.

2. RCE must submit the following standard CP forms to COSVA for VA-sponsored and co-sponsored conferences with estimated costs in excess of \$500,000 and upload into CORK once approved:

- a. VA Form 0907, Strategic Communication Review;
- b. VA Form 4265, Concurrence and Summary Sheet;

c. A conference approval request memorandum signed by the Under Secretary, Assistant Secretary, or Other Key Official; and

d. VA Form 10008, Conference Request Form.

In addition, the following documentation must be uploaded into CORK, but is not required to be included in the CP.

e. A list of all travelers (including full name, VA email address, travel authorization or local expense voucher number, do not include any PII); and

f. A list of all contract numbers associated with the conference.

3. RCE must submit the following post-conference reports for VA-sponsored and co-sponsored reportable conferences: ¹

- a. VA Form 10089b, Responsible Conference Executive (RCE) Post-Conference Certification Form; and
- b. VA Form 10089a, Final Conference Report
- B. Federal non-VA sponsored Conference Forms.

1. EC must submit for approval the following information to the authorized Approving Official for Federal non-VA sponsored Conferences with estimated costs up to \$500,000:

a. A conference approval request authorized by the Approving Official; (When the approval authority has been re-delegated, a copy of the Re-delegation of Authority Memorandum signed by the respective Under Secretary, Assistant Secretary, or Other Key Official is required to be made available upon request for audit purposes; and

b. Either include a completed VA Form 10090a, Federal Non-VA sponsored (External) Conferences Approval Plan, or include the following information:

- (1) Fiscal quarter;
- (2) Sponsoring office;
- (3) Hosting organization;

(4) Total estimated costs of all Federal non-VA sponsored conferences in the previous fiscal year;

- (5) Conference title;
- (6) Known or estimated date;
- (7) Location;
- (8) Projected number of attendees;
- (9) Estimated travel costs;

¹ These forms, or their equivalent, can be accomplished by entering requisite data into CORK

- (10) Estimated registration fees; and
- (11) Estimated total cost for maximum VA funding requested.

In addition, Administrations and Staff Offices are responsible for ensuring a final list of approved travelers is available upon request.

2. EC must submit the following standard approval request forms to COSVA for Federal non-VA sponsored Conferences with estimated costs over \$500,000:

a. A conference approval request signed by the Under Secretary, Assistant Secretary, or Other Key Official; and

- b. VA Form 0907, Strategic Communication Review;
- c. VA Form 4265, Concurrence and Summary Sheet; and

In addition, Administrations and Staff Offices are responsible for ensuring a final list of approved attendees is available upon request.

APPENDIX B: CONFERENCE COMPLIANCE REVIEW PROCEDURES

CTMRO will use the following procedures to conduct the review of all conference approval documents in CORK, and perform a sample audit of post conference report cost data. When conducting reviews, if CTMRO finds CPs are not in compliance, the Administration or Staff Office POC will be contacted for corrective action.

The compliance review will start with a weekly review of all pre-conference packages. Each week all conferences that will begin the following week will be reviewed using the procedures below.

All conference packages will be reviewed weekly based on the projected Final Conference Report (FCR) due date. Each week, CTMRO will review the conferences that should have a PCCF or FCR completed the previous week to determine whether the required reports were submitted on time.

A stratified sample of fully completed conference packages will be reviewed after the FCR has been submitted. Each week, a sample of the conferences that had their FCR completed the previous week will be reviewed using the procedures below.

It is recommended that the RCE use these procedures as guidelines for ensuring CPs for VA-sponsored and co-sponsored conferences are in compliance with policy.

- A. General Conference Information:
 - 1. CORK ID
 - 2. Conference Title
 - 3. Conference Cost Category (i.e. less than \$20K, \$20K-\$100K, etc.)
 - 4. Facility Type (Government or Commercial)
 - 5. Fiscal Year
 - 6. Quarter
 - 7. Conference Start Date
 - 8. Conference End Date
 - 9. PCCF Due Date
 - 10. PCCF Submission Date

- 11.FCR Due Date
- 12. FCR Submission Date
- 13. Administration/Staff Office
- 14.RCE
- B. Compliance Review Criteria:

1. Administrative Error - No correction required – No action will be required to correct administrative errors identified in a conference package. However, CTMRO will continuously assess these errors for actionable trends that can be resolved through process improvements or changes to policy. This type of error includes old form versions, spelling errors, and other administrative details that do not negatively impact the requirements of a complete conference package.

2. Material Error - Correction required – CTMRO will track material errors identified in a conference package to ensure they are corrected for the identified conference as required. Additionally, CTMRO will continuously assess all errors for actionable trends that can be resolved through process improvements or changes to policy. This type of error includes missing signatures, missing documents, or any missing information that is required by policy.

- C. Pre-Conference Review
 - 1. Conference Approval Documentation:

a. Does the conference package contain documentation that the conference was reviewed and approved?

b. Does the conference approval documentation contain sufficient justification that the conference supports the mission?

c. Was the conference approved by the proper authority as required?

d. Does CTMRO have a retained copy of the Re-delegation of Authority Memorandum for conference approval at or below \$100k?

e. Is appropriate documentation uploaded to support all unique requirements (e.g. Local Per Diem authorization, refreshments at conference, etc.) and approved by the appropriate authority?

f. Do all documents provide consistent information (i.e., location on the VA Form 10008, Conference Request Form matches the site selected in the

approval memorandum, RCE named is the same throughout, dates of the conference are the same on all documents, conference title in CORK matches conference title on documentation, etc.)?

- 2. VA Form 0907 Strategic Communication Review:
 - a. Is the VA Form 0907 for conferences greater than \$500K completed correctly?
 - b. Is the VA Form 0907 for conferences greater than \$500K signed by the proper authority?
- 3. VA Form 4265 Concurrence and Summary Sheet:
 - a. Is the VA Form 4265 for conferences greater than \$500K completed correctly?
 - b. Is the VA Form 4265 for conferences greater than \$500K signed by the proper authority?
- 4. VA Form 10008 Conference Request Form:
 - a. Is the VA Form 10008 completed correctly?
 - b. Is the VA Form 10008 signed by the RCE?
 - c. Were three geographically diverse cities compared?
 - d. Does the site selection rationale/notes block provide sufficient justification when the site selected was not the most cost effective site or a unique site was selected?
- D. Post Conference Review
 - 1. VA Form 10089b RCE Post Conference Certification Form (PCCF):
 - a. Is the PCCF completed correctly?
 - b. Does the data entered in CORK match the uploaded hardcopy PCCF if applicable?
 - c. Is the PCCF signed by the proper authority?
 - d. Was the PCCF completed within 15 days of conference completion?

- 2. VA Form 10089a Final Conference Report (FCR):
 - a. Is the FCR completed correctly?

b. Does the data entered in CORK match the uploaded hardcopy FCR, if applicable?

c. Is the FCR signed by the proper authority?

d. Was the FCR completed within 45 days of conference completion?

e. Are significant changes in conference scope from the approved preconference package identified and properly justified?

f. Does the use of contractor support include competitively awarded contracts, an adequate description of the contracting procedures used, and cost comparison factors considered?

g. Do the estimated costs on the FCR match the estimated costs originally submitted in the pre-conference approval package?

h. Are actual costs exceeding the estimated costs by 10% or greater documented with sufficient justification and approved by the proper authority?

i. Does the package indicate whether a Purchase Card was used and if so was the Purchase Cardholder properly identified?

j. Are appropriate supporting documents uploaded to support all travel, contract, and purchase card costs?

k. Do all documents provide consistent information (i.e. identical fields on the PCCF and FCR for record match.)?

- E. Cost Review
 - 1. Individual Traveler Costs:

a. Is a complete traveler attendee list provided to support a travel cost data pull from Concur?

b. Do the individual traveler costs reported on the FCR match the costs paid in Concur?

2. Contract Costs:

a. Is a complete list of contract numbers provided to support verification of contracts paid?

b. Do the contracting costs paid match the costs reported on the FCR?

3. Purchase Card Costs:

a. Are all purchase card invoices and receipts provided to support verification of purchases made?

b. Does the purchase card costs paid match the costs reported on the FCR?

c. Were there any inappropriate or unauthorized purchase card purchases noted that are contrary to restrictions on purchase card usage?

4. Cost Estimate to Actual Variance:

a. Do the actual costs exceed the estimated costs by 10% or greater?

b. Is proper justification provided when actual costs exceed the estimated costs by 10% or greater?

c. Was approval by the proper authority received for actual costs that exceed the estimated costs by 10% or greater?