



# Department of Veterans Affairs

## **Financial Policy**

### **Volume XIV**

#### **Travel**

### **Chapter 10**

## **Conference Planning, Oversight, and Reporting**

Questions concerning this policy chapter should be directed to:

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## 1001 Overview

This chapter establishes the Department of Veterans Affairs’ (VA) financial policies relating to conference planning, oversight, and reporting.

Key points covered in this chapter include:

- VA will appoint a Conference Approving Official (CAO) to approve all VA sponsored/co-sponsored conferences;
- A Responsible Conference Executive (RCE) will be appointed to plan, obtain approval, execute, and report on VA sponsored or co-sponsored conferences;
- RCE’s are responsible for ensuring proper stewardship of public funds during the planning and execution of conferences;
- VA CAOs must exercise discretion and judgment to ensure all conference expenses are appropriate, necessary, and managed in a prudent manner;
- In general, the use of Government funds to purchase food or refreshments for either Government personnel or non-Government individuals, including VA beneficiaries and stakeholders, is not authorized; however, there are some limited exceptions to this prohibition;
- A Contracting Officer (CO) or government purchase cardholder will follow existing laws, regulations and guidance when making conference related purchases; and
- Approved Conference Packages (CPs) associated with VA sponsored or co-sponsored conferences with expenses of \$20K or more and/or 50 or more attendees should be uploaded into the Conference Oversight and Reporting Knowledgebase (CORK) 30 days prior to the conference start date.

## 1002 Revisions

Section	Revision	Office	Reason for Change	Effective Date
1003 Definitions	Revised definition of “Conference” added Mission (Operational), and revised Reportable Conference.	OFP (047G)	Provide clarification to definitions.	April 2023
100504 Conference Package Development	Revised language regarding requirements for a Conference Package to be developed.	OFP (047G)	Provide clarification on conference packages.	April 2023
Various	Reformatted to new policy format and completed a full policy update.	OFP (047G)	Reorganized chapter layout and updated policy guidance.	March 2023

Section	Revision	Office	Reason for Change	Effective Date
Various	Clarified conference approval requirements for VA sponsored and co-sponsored conferences.	OFP (047G)	SECVA Memorandum, "Delegation of Authority for Travel and Conferences".	March 2023
Various	Changed subsection titles from currently published version.	OFP (047G)	Reorganization of Chapter.	March 2023
Various	Removed Federal Non-VA conference related requirements.	OFP (047G)	Leadership directed.	March 2023
1003 Definitions	Reviewed and updated definitions.	OFP (047G)	FSC Directed.	March 2023
1004 Roles and Responsibilities	Updated positions designated to approve and report on conferences based on the new Delegation of Authority.	OFP (047G)	Leadership Directed.	March 2023
100501	Added language regarding COVID-19 conference approvals.	OFP (047G)	SECVA Memorandum "Delegation of Authority for In Person Meetings for over 50 participants.	March 2023
100502 VA Sponsored and Co-Sponsored Conference Planning	Added language on RCE tasks.	OFP (047G)	FSC Directed.	March 2023
100506 Conference Approval	Updated thresholds and positions designated to approve conferences. Removed documentation requirements of re-delegation since no re-delegation was authorized.	OFP (047G)	SECVA Memorandum, "Delegation of Authority for Travel and Conferences".	March 2023

Section	Revision	Office	Reason for Change	Effective Date
Appendix A	Moved the older revision table to an appendix.	OFP (047G)	General Update.	March 2023
Appendix B	Removed outdated Delegation of Authority, which is no longer valid and added Instructions to Traveler (ITT) as appendix title.	OFP (047G)	General Update.	March 2023
Appendix C	Moved Conference Package Related Forms to section 100505 and replaced with Office of General Council Memorandum, Conference Clarification.	OFP (047G)	General Update.	March 2023
Appendix D	Added SECVA Delegation of Authority for In Person Meetings for over 50 participants.	OFP (047G)	SECVA DOA.	March 2023
Appendix E	Added Legislative and regulatory guidance for conference reporting.	OFP (047G)	Leadership directed.	March 2023

Reference Appendix A, Revision History for listing of previous changes.

### 1003 Definitions

**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.

**Conference** – A meeting, retreat, seminar, symposium, or event involving travel for attendees (FTR § 300-3.1). The term “conference” also applies to training activities that are considered conferences as defined by 5 C.F.R. § 410.404. A conference typically includes a registration process, a published substantive agenda, scheduled speakers or discussion panels and participation by multiple Federal agencies, or multiple organizations within an agency and/or private sector attendees. Mission (Operational) events as defined by FTR Chapter 301, Appendix C and OGC determination (e.g., ceremonies, Veteran outreach events, site visits, etc.) are not considered conferences but may be reportable if exceeds established thresholds.

**Conference Expenses** – All direct and indirect conference costs paid by the Government, whether paid directly by agencies or reimbursed by agencies to travelers or others associated with the conference. Conference expenses include any associated authorized travel and per diem expenses, hire of rooms for official business, audio/visual (A/V) equipment use, light refreshments, registration fees, ground transportation, and other expenses as defined by the Federal Travel Regulation (FTR) and Federal Acquisition Regulation (FAR).

**Conference Oversight and Reporting Knowledgebase (CORK)** – VA’s repository for reportable conference events.

**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).

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

**Federal Acquisition Regulations (FAR)** – The FAR is the primary regulation for use by all executive agencies in their acquisition of supplies and services with appropriated funds.

**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.

**Government Purchase Cardholder** – A VA employee who is delegated the authority to obligate funds on behalf of the government.

**Instructions to Traveler (ITT)** – A memorandum document distributed to individual travelers outlining event-specific instructions for how to plan and conduct a given travel episode.

**Mission (Operational)** – Per FTR Chapter 301, Appendix C, includes: Travel to a particular site in order to perform operational or managerial activities; travel to a conference to serve as a speaker, panelist, or provide information in one's official capacity; and travel to attend a meeting to discuss general agency operations, review status reports, or discuss topics of general interest. Examples of these types of events include 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.

**Per Diem** – A subsistence allowance for lodging, meals, and related incidental expenses incurred while on authorized Temporary Duty travel (TDY), when eligible (FTR § 301-11.1).

**Reportable Conference** – Any VA sponsored or VA co-sponsored conference, meeting, or other similar forum, which exceeds established thresholds for reporting purposes. Per 38 USC § 517, a meeting is reportable if; (1) attended by 50 or more individuals, including one or more employees of the Department; or (2) estimated to cost the Department at least \$20,000.

**Training** – The act of teaching a person a skill or competency. A transfer of knowledge or skill.

**Travel Authorization (TA)** – A written or electronic authorization to incur expenses while on authorized official business for the Government.

**Travel Claim** – A certified document submitted by the traveler in VA’s travel system, supported by documentation and receipts where applicable. The travel claim is a request for reimbursement of expenses incurred in the performance of official travel.

**Travel System** – The Government-contracted, end-to-end travel management service that automates and consolidates the Federal travel process in a self-service Web-centric environment, covering all aspects of official travel, including travel planning, authorization, reservations, ticketing, expense reimbursement, and travel management reporting.

**Traveler** – An individual authorized to perform official Government travel, in accordance with the FTR.

**Unique Site** – The only location fulfilling the conference criteria that could not otherwise be met at another location.

## 1004 Roles and Responsibilities

**Deputy Secretary (DEPSEC), Under Secretaries, Assistant Secretaries, and Other Key Officials (OKOs)** have been designated the authority by VA’s Secretary (SECVA) to plan and approve VA sponsored and co-sponsored conferences with net expenses in excess of \$100,000. A list of authorized OKO positions can be found in Volume I, Chapter 1, VA Financial and Accounting Policy Overview.

**Senior Executive Service (SES) or SES equivalent positions** have been designated the authority by the SECVA to approve VA sponsored and co-sponsored conferences with net expenses less than \$100,000. In addition, SES or SES equivalent positions are responsible for approving any food related purchases associated with a conference.



**Assistant Secretary for Management and Chief Financial Officer (ASM/CFO)** is responsible for travel operations and policy for the Department. ASM/CFO has been designated the authority by the SECVA for conference reporting as required by 38 U.S.C. 517 and OMB M-17-08.

**Conference Approving Official (CAO)** – A position designated the authority to approve a conference package. SES or SES equivalent positions will be appointed to approve conferences less than \$100K in costs. For conferences greater than \$100K, DEPSEC, Under Secretaries, Assistant Secretaries and OKOs have been delegated the authority to approve.

**Executive Director, Financial Services Center (FSC)** has been designated by the ASM/CFO as the signature authority to submit Quarterly reports to Congress on VA sponsored and co-sponsored conferences. The executive Director also is responsible for submitting the annual report to VA Office of the Inspector General (OIG) for conferences greater than \$100K.

**Responsible Conference Executive (RCE)** is responsible for planning, approval, oversight, and reporting of VA sponsored or co-sponsored conferences. RCE responsibilities include but are not limited to ensuring proper stewardship of public funds, ensuring compliance with VA policy, ensuring data is accurately recorded in Conference Oversight Reporting Knowledgebase (CORK) and for nominating a Contract Officer Representative (COR).

**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 warranted Contracting Officer (CO).

**Financial Services Center (FSC)**, is responsible for:

- Tracking, reporting, and performing oversight of reportable conferences to ensure compliance with applicable laws, regulations, and policies;
- Providing guidance and assistance to the Administrations and Staff Offices on conference approval requests;
- Updating all conference related training; and
- Managing the CORK system.

**Approving Officials (AOs)** have the authority to approve TAs and travel claims associated with TDY and local travel and are responsible for:

- Being knowledgeable of employee's travel plans;
- Ensuring all travel is approved consistent with FTR, VA travel policy, and any other Department-specific guidance (e.g., travel notices);
- Ensuring travelers select the purpose code "Conference", and the applicable "Conference Title", on their TA in accordance with the Instruction-to-Travelers (ITT) memo; and
- Monitoring timely processing of travel claims.

**Travelers** are responsible for:

- Conducting official travel in accordance with the requirements of the FTR and ITT;
- Claiming and obtaining, where applicable, lodging tax exemptions;
- Selecting the purpose code “Conference” and the applicable “Conference Title” displayed in the “Conference Attending” field; and
- Recording CORK ID number in the document details of the TA.

## **1005 Policies**

### **100501 General Policies**

- A. OMB Memorandum M-17-08 requires VA to ensure that Federal funds are managed in a prudent manner and all VA sponsored and co-sponsored conference activities and expenses are necessary and appropriate.
- B. OMB Memorandum M-17-08 requires that travel and procurement activities related to conferences be conducted in compliance with FTR and FAR.
- C. OMB Memorandum M-17-08 requires VA to focus on oversight of conference planning, approval and reporting of VA sponsored and co-sponsored conferences. However, Administrations and Staff Offices must continue to exercise discretion and judgment in ensuring other types of conference expenses (e.g., Federal Non-VA Conferences and Non-Federal Conferences) are appropriate, necessary, and managed in a prudent manner.
- D. Due to COVID-19 workplace safety concerns, Secretary of Veterans Affairs (SECVA) issued a Delegation of Authority requiring higher level approval of conferences under certain conditions. Refer to Appendix D for further guidance and information.
- E. Conference organizers and approvers can find conference related resources, instructions, and examples of Conference Packages (CP) at the VA Conference Resource web site.

### **100502 VA Sponsored and Co-Sponsored Conference Planning**

- A. The CAO will appoint a RCE to plan a VA sponsored or co-sponsored conference, certify the CP, obtain necessary approvals, and maintain documentation for audit purposes.

- B. RCEs will ensure VA sponsored or co-sponsored conferences, with planned costs of \$20K or more and/or 50 or more attendees, have an approved CP that has been uploaded into CORK along with any required documentation.
- C. The appointed RCE must be a Federal Government employee (not a contractor), complete current training in the Talent Management System (TMS) “Responsible Conference Executive (RCE) Certification Course” and have the necessary fiduciary knowledge. RCEs must complete the conference training certification course every two years.
- D. CAOs will ensure each appointed RCE has taken the required training.
- E. The appointment of an RCE will be documented in the conference approval request memorandum and uploaded into CORK.
- F. In the event an RCE is unable to execute their duties, the requesting office will appoint by memorandum a replacement RCE and upload this information into CORK.
- G. RCEs and CAOs will establish internal processes, tools, procedures, and roles and responsibilities needed to comply with VA policies and CORK requirements.
- H. RCEs and CAOs will publish supplemental processes and guidance, as applicable, to ensure program effectiveness.
- I. RCEs and CAOs will ensure the business case for each VA sponsored and co-sponsored conference justifies the use of VA resources (e.g., number of attendees, costs associated, and number of business days).
- J. RCEs and CAOs will identify purchase cardholder(s) to perform the transactions required for reportable conferences and ensuring the purchase cardholder’s approving official is aware of the designation and has all required documentation prior to approving transactions.
- K. RCEs will ensure all purchases are made using the appropriate payment process and receive required approvals.
  - 1. Above the micro-purchase limit, the CO determines the best vehicle for purchases.
  - 2. At or below the micro-purchase threshold, RCE’s must designate a purchase cardholder to perform the transaction, ensure the cardholder’s purchase card approving official is aware of the designation, and has all required documentation prior to approving transactions. The purchase cardholder must have CAO approval prior to purchase. Reference Volume XVI, Chapter 1A, Administrative Actions for Government Purchase Cards, and Volume XVI Chapter 1B,

Government Purchase Card for Micro-Purchases, regarding the cardholder and the purchase card approving official responsibilities.

- L. CAOs will review and approve/disapprove a CP.
- M. RCEs and CAOs must be fiscally responsible when selecting conference locations and planning conference activities.
- N. RCEs and CAOs may request Office of General Counsel (OGC) assistance if there are questions in determining whether an event is considered a conference. Refer to OGC guidance in Appendix C and FTR Chapter 301, Appendix C for additional information on what is considered a conference.
- O. VA will not incur expenditures for entertainment (videos, music, etc.), bus tours, 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.
- P. The use of Government funds to purchase food is not generally authorized. Refer to Volume II, Chapter 4, Awards, Ceremonies, Food and Refreshments, Gifts or Mementos; Volume XIV, Chapter 1, Travel Administration; and 5 U.S.C. § 4109, Government Employees Training Act (GETA) for additional information.
- Q. If it is determined food should be authorized as part of the event, the purchase of food must be approved by an SES or SES equivalent position as a separate and distinct approval prior to the CP being sent for approval. The approval of food purchases shall be documented and included with the CP submitted in CORK.
- R. RCEs and CAOs will ensure a Contracting Officer (CO) or Government Purchase Cardholder (GPC) are the only ones making purchases within the limits of their individual authority.
- S. RCEs are prohibited from bundling VA sponsored or co-sponsored conferences.

### **100503 Site Determination**

- A. RCE's must analyze estimated conference expenditures for different sites to determine which geographical location and facility would provide the overall best value to the Government. This analysis is referred to as performing a site cost comparison (FTR § 301-74.5).
- B. When selecting a site for a VA sponsored or co-sponsored conference in accordance with FTR § 301-74.5, RCEs will:

1. Consider alternatives to a face-to-face conference, such as teleconferencing, before making any firm commitment on a physical location.
  2. 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)).
  3. Conduct a site cost comparison (FTR § 301-74.4) for the size, scope, and locations of the proposed conference and document the comparison using VA Form 10008. RCEs are responsible for conducting market research of at least three (3) diverse geographical locations to ensure that the site determined to provide the best overall value is chosen for the conference. RCE's must ensure the market research includes all necessary costs (e.g., Conference Room Rental, Lodging, A/V equipment costs, etc.).
  4. When a unique site is required, provide the costs and justification for the unique site in the site selection rationale/notes section of VA Form 10008 and included in the conference approval request memorandum. A site comparison is not required.
  5. Ensure documentation of all considered sites, site evaluation criteria, and the selection rationale (or unique site justification) is retained in accordance with FTR § 301-74.14 and record retention requirements.
- C. When considering potential site locations for VA sponsored and co-sponsored conferences, VA will maximize the use of Government-owned or Government-provided conference facilities (FTR § 301-74.1(b)).
- D. Although Government facilities must be given priority when considering locations for holding a VA conference, the RCE must ensure via a site comparison that the government facility is providing the best overall value to the government.
- E. RCEs may contact Contracting Officers (CO) to seek suggestions or guidance based on previous experience in finding a conference facility.
- F. RCEs and COs must ensure VA does not solicit lodging accommodation upgrades as part of contracts.
- G. Minimizing costs is a critical consideration in determining whether to use an Event Planning and Event Support Services (EPESS) blanket purchase agreement (BPA). 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. RCE's should consult with the CO to determine if internal VA support services would provide the best value to VA. If circumstances make the use of a conference planner necessary, the contract with the planner must cover only planning and logistical support.

- H. Administrations and Staff Offices are permitted to use EPESS BPA and/or a la carte contracts for event support services. All proposed contracts utilizing event support services where VA's commitment, expenditure, and liability combined exceed \$25,000 require legal review by OGC Procurement Law Group and technical review by Acquisition Assistance Division or Acquisition Program Management Division staff prior to signature by a CO.
- I. The use of third-party contract planners does not eliminate the requirement for reporting total conference costs.
- J. In accordance with 40 U.S.C. § 8141, VA will not directly procure group lodging facilities for conferences held in the District of Columbia, without specific approval and appropriation from Congress.

#### **100504 Conference Package Development**

- A. RCEs are responsible for developing the CP and all required documents necessary to support the CP.
- B. A CP will be prepared for all VA sponsored and co-sponsored conferences.
- C. A CP is not required for "Mission (Operational)" events (i.e., those coded for travel purposes in VA's travel system pursuant to FTR Chapter 301, Appendix C, as "Mission (Operational) unless the event is (1) attended by 50 or more individuals, including one or more employees of the Department; or (2) estimated to cost the Department at least \$20,000. Mission (Operational) events as described by FTR Chapter 301, Appendix C include:
  - Day-to-day operational or managerial meetings;
  - Meetings to discuss topics of general interest;
  - Advisory committee meetings;
  - Hearings;
  - Site visits;
  - Informational meetings;
  - Inspections;
  - Audits; and
  - Investigations, and examinations;

In addition, OGC has opined that other events and training courses are not reportable as conferences, therefore CPs do not need to be prepared for events such as:

- Veteran outreach (e.g., sports programs);
- Traditional ceremonies (e.g., change of command, ground-breaking, official military awards, and funerals);

- VA recruitment activities; and
  - Formal classroom training (e.g., coursework at established government or commercial training facilities such as, VA's Law Enforcement Training Center, and VHA's National Simulation Center).
- D. The assigned RCE for a conference is prohibited from serving as the CAO on the same conference, as there must be a separation of duties between the RCE and CAO roles.
- E. RCEs will include an estimate for all applicable conference costs listed in VA Form 10008, Conference Request Form and will:
1. Base per diem estimates on GSA Per Diem Rates for the locality;
  2. Ensure estimated attendance is a reasonable estimate of participants based on anticipated interest and include estimated costs for late additions, as presenters and other attendees, which are likely to occur after conference approval. VA representation will be limited to the minimum number of attendees determined necessary to accomplish the purpose of the conference;
  3. Ensure conference costs include both direct and indirect conference expenses paid by VA. Total costs include all necessary conference-related site visits;
  4. Ensure contracts with conference vendors include itemized fees for goods and services. Costs may not be added to a line-item(s) as a payment option for or supplement a separate expense. For example, the price for a meeting room or lodging rate may not be inflated to pay for food (meals or refreshments) or for entertainment or awards; and
  5. Prevent the inclusion of any entertainment costs. Reference Volume II, Chapter 4, Awards, Ceremonies, Food and Refreshments, Gifts or Mementos and 43 Comp. Gen. 305, B-152331 for additional guidance. For specific statutory requirements for reporting of entertainment costs of a conference reference 38 U.S.C. § 517.
- F. RCEs will ensure the CP includes the following documents (where applicable) for all VA sponsored or co-sponsored conferences:
1. A RCE training completion certificate from VA TMS current online training;
  2. A conference approval request memorandum;
  3. Other documents may be necessary when routing for approval (e.g., VA Form 4265 Concurrence and Summary Sheet, etc.);
  4. VA Form 10008, Conference Request Form;

- 5. For conference events with estimated costs of greater than or equal to \$100,000, the market research summary, including the Request for Information (RFI), must be included;
- G. RCEs should submit CPs to a CAO for approval no later than 50 calendar days prior to the start of the conference. A CAO must approve a CP before VA can incur any conference obligations.
- H. RCEs must consult with OGC’s Ethics Specialty Team on whether any proposed gift(s) may be accepted (e.g., special rates or benefits) within the conference occurrences, and include guidance provided by OGC in the CP.
- I. RCEs will review and certify that the CP is compliant with regulations and policy, and route for approval as required in Table 1: Conference Approval Requirements.

**100505 Conference Approval**

- A. RCEs should submit the complete CP to the appropriate CAO for approval no later than 50 calendar days prior to the start of the conference.
- B. VA sponsored and co-sponsored conferences must be approved based on the number of attendees and cost related thresholds contained in Table 1.
- C. In accordance with Secretary of Veterans Affairs (SECVA) Memorandum, “Delegation of Authority for Travel and Conferences” the SECVA has delegated the positions in Table 1 below as the approval authority for VA sponsored or co-sponsored conferences. Refer to Volume XIV, Chapter 1, Travel Administration for a copy of the SECVA delegation.

**Table 1: Conference Approval Requirements**

<i>Estimated Cost to VA</i>	<i>Certification</i>	<i>Recommendation for Approval</i>	<i>Approval</i>
<b>&lt; \$20K and &lt; 50 Attendees</b>	Not Required	Knowledgeable employee from requesting office	SES or SES equivalent positions, with no further delegation.
<b>&lt; \$20K w/ ≥ 50 attendees or ≥ \$20K but ≤ \$100K</b>	RCE	RCE	SES or SES equivalent positions with no further delegation.



<i>Estimated Cost to VA</i>	<i>Certification</i>	<i>Recommendation for Approval</i>	<i>Approval</i>
≥ \$100K	RCE	RCE	DEPSEC, Under/Assistant Secretaries and OKOs, with no further delegation.

- D. In accordance with OMB M-17-08, CAOs approving estimated conference spending in excess of \$500,000 on a single conference must document in writing justification for the expenditure, specifically noting the expense is the most cost-effective option to achieve a compelling purpose.
- E. Separation of duties must be maintained between roles for example, an RCE cannot also be the CAO for the same conference.
- F. Once the VA sponsored/co-sponsored conference has been approved by the CAO, the RCE will upload the CP in CORK if required. Approved Conference Packages should be uploaded into the CORK 30 days prior to the conference start date.
- G. RCEs must ensure the Instructions to Travelers (ITT) is provided to all conference attendees (refer to Appendix B, Instructions to Travelers). If the contract stipulates a meal will be provided, ITT must include instructions about the provided meal(s) and that travelers must deduct the costs from Meals and Incidental Expenses in their travel claims. Refer to Volume II, Chapter 4, Awards, Ceremonies, Food and Refreshments, Gifts or Mementos for exceptions.

**100506 Change in Conference Location or Costs after Approval**

- A. When a change occurs in a planned conference location, date or estimated cost (>10%) an RCE must prepare a memorandum indicating a change in conference location, dates, or scope for CAO approval.
- B. RCEs must submit an amended VA Form 10008 with the prepared memorandum indicating a change in conference location, dates, or scope.
- C. If approved estimated conference costs increase by ten percent RCEs must notify the CAO and seek re-approval. Re-approval can be accomplished with a summary memorandum to the CAO for signature. If the amount of the increase pushes the estimated conference costs above \$100,000, the RCE will need to resubmit the CP to the appropriate DEPSEC, Under Secretaries, Assistant Secretaries or OKO for approval. The CP documents will need to be updated to reflect the change in cost where applicable and if costs increase to \$20K or more and/or 50 or more attendees, these documents must be uploaded into CORK.

- D. If the final cost per attendee increases by ten percent or more as compared to the estimated cost per attendee, RCE's must provide justification for the cost increase and provide written notification to the official who approved the original CP. The CAO must acknowledge receipt of the notification by signing and dating the document. The CP documents will need to be updated to reflect the change in cost where applicable and if costs increase to \$20K or more and/or 50 or more attendees, these updated documents must be uploaded into CORK.

### **100507 Travel, Expenses, Meals, and Light Refreshments**

- A. VA employees traveling for VA sponsored and co-sponsored, conferences will adhere to Volume XIV for guidance on making travel arrangements, authorized expenses, approvals, and submitting claims.
- B. Travelers must adhere to the ITT prepared by the RCE.
- C. In general, the use of Government funds to purchase food or refreshments for either Government personnel or non-Government individuals, including VA beneficiaries and stakeholders, is not authorized; however, there are some limited exceptions to this prohibition. Reference Volume II, Chapter 4, Awards, Ceremonies, Food and Refreshments, Gifts or Mementos for details.
- D. Local travel lodging and meals can only be authorized under 5 U.S.C. § 4109, Government Employees Training Act (GETA). Refer to Volume XIV, Chapter 7, Local Travel for details.
- E. When planning conferences in the local area of the official station, RCEs will schedule time for local attendees to obtain their meal(s) at no expense to the government. Using appropriated funds to provide meals or make food purchases is generally prohibited as a conference cost with limited exceptions. Refer to Volume XIV, Chapter 7 Local Travel and Volume II, Chapter 4 Awards, Ceremonies, Food or Refreshments, Gifts or Mementos for specific details and exceptions.
- F. While travelers are expected to obtain lodging consistent with GSA established lodging rate for the Temporary Duty travel (TDY) locality, it may not always be possible. When a traveler is not able to obtain lodging with the GSA established per diem rate, they may request approval of actual expense (refer to Volume XIV, Chapter 2, Travel Per Diem).
- G. After a VA sponsored or co-sponsored conference takes place, RCE's will ensure the final travel costs reported only include costs incurred for the specific conference. A Travel Authorization (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.

### **100508 Conference Oversight**

- A. Administrations and Staff Offices must ensure appropriate internal controls are in place to prevent the misuse of appropriated funds related to conference activities.
- B. CAOs must ensure RCEs have completed the required TMS training to support conference development and obtaining proper approvals.
- C. RCEs are 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.
- D. RCEs are responsible for providing first line oversight in the planning, execution, and reporting of all VA Sponsored and Co-Sponsored conferences. The RCEs role is critical to VA's continuing effort to prevent Fraud, Waste, and Abuse.
- E. RCEs will inform all employees planning or attending a conference of prohibitions against soliciting or receiving any gifts or gratuities from outside entities. This information must be included in the ITT. Reference Volume XIV, Chapter 9, Non-Federal Source Funding (Donated Travel), for guidance. RCE's and employees must consult with OGC's Ethics Specialty Team for advice.
- F. RCE's will determine appropriate on-site conference support personnel before, during, and after a conference. These individuals must be identified by name and the designation provided to these travelers for inclusion in their travel receipts.
- G. RCE's will update CORK if there is a change or cancellation to a planned conference.
- H. FSC will oversee VAs conference compliance and provide support to RCEs through its compliance oversight and reporting division.
- I. FSC will ensure compliance with all laws, regulations, guidance, and OMB memorandums on conference activities.
- J. FSC will provide guidance to address any issues identified related to compliance with VA conference policies and procedures.

### **100509 Conference Reporting**

- A. RCEs must ensure CORK is updated post conference with the following:

1. A list of all in-person attendees (including full name, VA email address, and TA or local travel claim number) that attended the conference to include total expenses for each traveler. Do not include any Personally Identifiable Information;
  2. A list of all virtual attendees;
  3. A copy of the ITT distributed to attendees;
  4. A copy of any contract(s) or GPC orders and other supporting documents to include invoices and goods receipts to support verification of purchases made; and
  5. Appropriate documents to support all travel expenses (VA employees/contractors).
- B. RCEs must complete, sign, and submit the below post-conference forms for VA sponsored and co-sponsored conferences with actual costs of \$20K or more and/or 50 or more attendees into CORK within the established timeframes. As an alternative, the forms can be accessed and completed directly in CORK.
1. VA Form 10089a, Final Conference Report will be submitted within 45 calendar days of the conclusion of the reportable conference; and
  2. VA Form 10089b, Responsible Conference Executive (RCE) Post-Conference Certification Form will be submitted within 15 calendar days of the conclusion of the reportable conference.
- C. RCEs will ensure the completion and submission of post conference forms if the:
1. Conference was originally initiated as reportable but determined to be non-reportable post conference due to actual costs or attendee participation being lower than expected.
  2. Conference was originally initiated as non-reportable (i.e., estimated costs less than \$20K or less than 50 people attending) but determined to be reportable post conference due to actual costs or attendee participation being higher than expected. In addition to the post conference forms, RCEs must also submit the CP approval forms and related documentation into CORK.
- D. The RCE must sign both the Post Conference Certification Form and the Final Conference Report in CORK.
- E. Every effort will be made to ensure the Final Conference Report includes all travel costs for all travelers from their completed travel claims in VA Travel System.

- F. The Executive Director, of the Financial Services Center has been designated by the ASM/CFO the responsibility for reporting conferences to Congress, VA Office of the Inspector General (OIG), and VA public website per the requirements established in OMB M-17-08. No further designation is authorized.
- G. FSC Executive Director will generate reports to Congress, VA OIG, and VA's public website for conference reporting requirements. Refer to Table 2 below for further guidance on conference reporting requirements.
- H. FSC's Executive Director, will provide reports to Congress (Committee on Veterans' Affairs of the Senate and the House of Representatives) as outlined in table 2 and in accordance with 38 U.S.C. § 517. Reports to Congress shall include:
- Total estimated costs 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.
- I. FSC's Executive Director, is required to submit conference reports to OIG as outlined in Table 2 and in accordance with VA's annual appropriation act and OMB M-17-08.
- J. In compliance with OMB M-17-08, FSC's Executive Director will report on VA's public website the required conferences in Table 2 sponsored by VA during the prior fiscal year. Information reported will include:
- Total conference expenses incurred by VA for the conference;
  - Location of the conference;
  - Date of the conference;
  - A brief explanation how the conference advanced VA's mission;
  - The total number of individuals whose travel expenses or other conference expenses were paid by VA; and
  - For any instances where the total expense for a VA sponsored conference exceeded \$500,000, the CAO's rationale for approval. Information considered to be sensitive, that is prohibited from public disclosure by statute or regulation, or that may jeopardize the national security or health, safety or security of conference attendees, organizers, or other individuals shall not be disclosed.
- K. Refer to Appendix E for additional guidance on Conference Reporting.

**Table 2: VA Sponsored and Co-Sponsored Conference Reporting**

Estimated Cost to VA	Frequency of Statutory Reporting	Reported to	Time Frame for Statutory Reporting	Frequency of Posting Requirement	Time Frame for Posting Requirement
< \$20K and < 50 attendees	N/A	N/A	N/A	N/A	N/A
≥ \$20K or ≥ 50 attendees,	Quarterly	Congress	NLT 30 calendar days after the end of the fiscal quarter	Posting not required	Posting not required
		Inspector General	NLT 15 calendar days after the end of the fiscal quarter		
> \$100K	Annually	Public Website and Office of Inspector General	NLT January 31, following the close of each fiscal year	Annually	January 31

**100510 Record Retention**

- A. All approved VA Sponsored and co-Sponsored conference documents must be retained for six years in accordance with National Archive and Records Administration (NARA) guidelines, and available for inspection by VA OIG or other interested parties, as requested.
- B. The RCE is responsible for ensuring record retention requirements are met for any supporting documents that are not retained in an automated system.

**1006 Authorities and References**

[5 C.F.R. § 410.404, “Determining if a conference is a training activity”](#)

[5 U.S.C. § 4109 Government Employees Training Act \(GETA\)](#)

[5 U.S.C. Part III, Subpart D, Chapter 57, “Travel, Transportation, and Subsistence”](#)

[38 U.S.C. § 309, Chief Financial Officer](#)

[38 U.S.C. § 517, Quarterly Reports to Congress on Conferences Sponsored by the Department](#)

[40 U.S.C 8141, Contract to rent buildings in the District of Columbia not to be made until appropriation enacted](#)

[CFO Act of 1990](#)

[Executive Order 13589, “Promoting Efficient Spending”](#)

[Federal Acquisition Regulations \(FAR\)](#)

[FTR Bulletin 14-02, “Clarification of Agency Reporting Requirements for Conferences”](#)

[FTR Chapter 301, Temporary Duty \(TDY\) Travel Allowances](#)

[GSA Per Diem Rates](#)

[GSA SmartPay State Tax](#)

[OMB Memorandum M-7-08, November 25, 2016](#)

[Public Law 117-103, "Consolidated Appropriation Act 2022", Division E, Title VII, Section 738](#)

[The Administrator, Veterans Administration, 43 Comp. Gen. 305, B-152331\(1963\)](#)

[VA Conference Resource Home](#)

[VA Financial Policy, Volume I, Chapter I, VA Financial and Accounting Policy Overview](#)

[VA Financial Policy, Volume II, Chapter 4, Awards, Ceremonies, Food or Refreshments, Gifts or Mementos](#)

[VA Financial Policy, Volume XIV Travel](#)

[VA Financial Policy, Volume XVI Chapter 1A, 1B, and 1C](#)

[VA Form 10008, Conference Request Form](#)

[VA Form 10089a, Final Conference Report](#)

[VA Form 10089b, Responsible Conference Executive \(RCE\) Post-Conference Certification Form](#)

[VA Form 10090a, Federal Non-VA sponsored \(External\) Conferences Approval Plan](#)

[VA Form 10091, VA FSC Vendor File Request Form](#)

[VA's Public Website on conference expenditures over \\$100,000](#)

### **1007 Rescissions**

VA Financial Policy, Volume XIV, Chapter 10, Conference Planning, Reporting, and Oversight, October 2021.

### **1008 Policy Approval**

This policy was approved by the VA Chief Financial Officers' Council on April 10, 2023.



**Appendix A: Revision History**

The following revisions occurred prior to the current published version of the chapter. The section numbers referenced below may have changed during the course of subsequent revisions.

Section	Revision	Office	Reason for Change	Effective Date
1001	Added language clarifying that conference organizers should act in a fiscally responsible manner when selecting conference locations and activities and guidance on the purchase of food or refreshments.	OFP (047G)	Leadership Directed	July 2019
1002	Moved all May 2018 revisions to Appendix A	OFP (047G)	General Policy Update	July 2019
1004	Updated ASM/CFO designation to current position title, Deputy Assistant Secretary for Finance; updated the Inspector General reporting requirement, and the appropriation bill reference in accordance with the DOA in Appendix B.	(047G)	June 3, 2019, SECVA DOA; Consolidated Appropriations Act, 2019	July 2019
100501 A.	Added VA policy guidance for conference expense compliance.	OFP (047G)	Leadership Directed	July 2019
10051 C.	Added VA policy and statutory guidance on entertainment costs; clarified circumstances are limited to exceptions in which lodging, meals, or refreshments can be provided	OFP (047G)	Leadership Directed	July 2019
10051 D. and F.	Added language reflecting the necessity of selecting 3 different geographic locations to be reviewed for the most cost-effective location to be chosen.	OFP (047G)	Leadership Directed	July 2019
10053 B.7.	Removed language receipts are required when requested in	OFP (047G)	General Policy Update	July 2019

Section	Revision	Office	Reason for Change	Effective Date
	advance by approving official, more restrictive than FTR.			
10053 B.10.	Added VA policy guidance for exceptions using appropriated funds for food.	OFP (047G)	Leadership Directed	July 2019
100503 B.11.	Added statutory guidance for exceptions using appropriated funds for entertainment.	OFP (047G)	Leadership Directed	July 2019
10053 C.2.	Changed ASM/CFO distribution of the CTCSS quarterly conference compliance review results.	OFP (047G)	Leadership Directed	July 2019
100504 A.2. and A.3.	Added note clarifying that if someone other than the Responsible Conference Executive (RCE) signs the PCCF or FCR in CORK, then the hard copy signed by RCE's must be uploaded.	OFP (047G)	Leadership Directed	July 2019
100504 B.	Updated Table 2-foot note 3 with current appropriation act for 2019, including the change in requirement to report to Inspector General all VA and VA co-sponsored conferences ≥ \$20,000 NLT 15 calendar days after each quarter.	OFP (047G)	Consolidated Appropriations Act, 2019	July 2019
100510 D	Added a higher lodging rate may not be negotiated in exchange for food; added language clarifying if meals are provided at a VA sponsored or co-sponsored event, the cost per person cannot exceed the daily per diem rate for the selected location.	OFP (047G)	Leadership Directed	July 2019
1007	Rescinded Vol XIV Travel - Chapter 10, "Conference Planning, Reporting, and Oversight", May 2018	OFP (047G)	General Policy Update	July 2019

Section	Revision	Office	Reason for Change	Effective Date
Appendix A	May 2018, 5-year revisions moved here from Section 1002 Revisions.	OFP (047G)	General Policy Update	July 2019
Appendix B	Added June 3, 2019 Delegation of Authority (DOA) on Conference Reporting Requirements.	OFP (047G)	June 3, 2019, SECVA DOA	July 2019
Various	Reformatted to new policy format and completed 5-year review.	OFP (047G)	Reorganized chapter layout	May 2018
1004	<p>Added CTCCS responsibility to import approved conferences in CORK to VA's travel system Conference Module.</p> <p>Added Approving Official responsibility to ensure travelers select the purpose code "Conference" and the applicable.</p> <p>Added Traveler responsibility to select the purpose code "Conference" and the applicable conference title associated to the TA.</p>	OFP (047G)	Conference Module implementation in VA Travel System	May 2018
100501	B. Added oversight requirement for RCE appointment to be named in the conference approval request memorandum and that RCE must complete the required RCE training.	OFP (047G)	General policy update.	May 2018
100501	C 9. Added guidance regarding meals in travel claims.	OFP (047G)	Clarification	May 2018
100501	C.11. Added RCE responsibility to schedule time for local attendees to obtain meal(s) at no expense to the government when planning conferences in the local area of the official station.	OFP (047G)	Update to Vol. XIV, Chap. 7, Local Travel	May 2018
100502	B. Changed, "CPs prepared" to "conferences".	CTCCS	Administrative Update	May 2018

Section	Revision	Office	Reason for Change	Effective Date
100503	A. Added oversight requirement to ensure RCE completes required RCE training.	OF (047)	General Policy update	May 2018
100503	B.3. Added requirement for an RCE signed memo indicating a change in location and/or dates if conference location and/or dates change after approval, and it does not affect conference scope/costs. If there is a location change, RCE's must also include the costs in the memo as accomplished on the VA Form 10008.	CTCCS	General Policy clarification	May 2018
100503	B.7.m Added additional instructions to ITT memo for travelers when creating travel authorizations and changing or cancelling the TA.	CTCCS	Conference Module implementation in VA Travel System	May 2018
100504	A.3. Added language to increase timely FCR submission by allowing use of TA cost estimates for 5% of travelers.	CTCCS	General Policy Update	May 2018
100504	Table 2: deleted OMB Memorandum 12-12, added OMB Memorandum 17-08.	OFF (047G)	Update to OMB memorandums	May 2018
100504	D. Added 15-day notification requirement with H.R. 1625, "Consolidated Appropriations Act, 2018".	CTCCS	General Policy Update	May 2018
100504	E. Deleted OMB 12-12, added OMB M-17-08.	OFF (047G)	Update to OMB memorandums	May 2018
100505	B. Clarified requirement for EC appointment to be made in the conference approval request memorandum.	CTCCS	General Policy Update	May 2018
100510	C. Added RCE requirement to plan venue and agenda to mitigate the need for local travelers to obtain lodging to minimize costs that are	OFF (047G)	Update to Vol. XIV, Chap. 7, Local Travel.	May 2018

Section	Revision	Office	Reason for Change	Effective Date
	most economical to the government.			
100510	D. Added RCE requirement to plan venue and agenda to mitigate the need for the government to purchase meals for local travelers so costs are the most economical to the government.	OFF (047G)	Update to Vol. XIV, Chap. 7, Local Travel	May 2018
Appendix A	Added Revision History.	OFF (047G)	Administrative Update	May 2018
Appendix B	Added Approval Authority	CTCCS	Administrative Update	May 2018
Appendix C	D.2.d. Changed “45 days” to “45 calendar days”.	CTCCS	Administrative Update	May 2018
Appendix D	A.1.d.e. and 2.g.h. Added requirement for supporting documents to support FCR costs and justification when actual costs exceed the estimated costs by 10% or greater.	CTCCS	General Policy clarification	May 2018
100504	Updated referenced chapters for light refreshments and/or meals at conferences	CTCCS	Updated references to Awards Vol II Ch4 and Local Travel Vol XIV Ch. 7.	August 2017
100301	Defined Approving Official	CTCCS	General Policy Update	January 2017
100302	Specified bundling restriction applies to VA sponsored conferences only	CTCCS	General Policy Update	January 2017
100303	Added note to clarify conference definition and linked to OMB memorandum 17-08	CTCCS	General Policy Update	January 2017

Section	Revision	Office	Reason for Change	Effective Date
100304	Removed reference to non- VA sponsored conferences in Conference Package definition	CTCCS	General Policy Update	January 2017
100306	Clarified Executive Champion definition	CTCCS	General Policy Update	January 2017
100308	Added definition of Formal Classroom Training	CTCCS	General Policy Update	January 2017
100309	Modified Per Diem definition	CTCCS	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)	CTCCS	General Policy Update	January 2017
100501.0 1	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	CTCCS	General Policy Update	January 2017
100501.0 2	A. Changed “should” to “must”	CTCCS	Administrative Update	January 2017
100501.0 3	C.2. Updated for CORK II requirements C.3. Provided clarification when revised CP is required when estimates change	CTCCS	General Policy Update	January 2017

Section	Revision	Office	Reason for Change	Effective Date
100501.0 4	Added calendar days throughout to clarify reporting requirements. Updated for CORK II requirements	CTCCS	Administrative Update	January 2017
100502.0 1	Modified verbiage to align with EC definition	CTCCS	Administrative Update	January 2017
100502.0 2	Removed CTCCS from oversight of DOA memos for Federal 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	CTCCS	General Policy Update	January 2017
100503	Moved instructions for international conferences from 100501	CTCCS	Administrative Update	January 2017
Appendix A	Updated to align with policy changes	CTCCS	General Policy Update	January 2017
Appendix B	Updated to revise checklist questions with policy/form updates	CTCCS	General Policy Update	January 2017
Various	Changed language from non-VA sponsored conferences to Federal Non-VA sponsored conferences.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
Various	Names change from Corporate Travel and Reporting Office (CTRO) to Corporate Travel	CTMRO CTCCS	Administrative update	December 2016

Section	Revision	Office	Reason for Change	Effective Date
	Management Reporting Office (CTMROCTCCS)			
100302	Deleted VAAA authorization to bundled conferences.	CTMRO CTCCS	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.	CTMRO/ CTCCS	OGC Conference Clarification Opinion (VAIQ 7713724)	December 2016
100317	Changed SECVA waiver to COSVA Approval.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100401	Changed SECVA waiver to COSVA approval.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100402	Changed DEPSEC >\$100K to \$500K approved thresholds to Under/Assistant Secretaries and Other Key Officials.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100501.0 1	Incorporated new language on agencies requirements from M-17-08 and deleted old language from M-12-12.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100501.0 2	Updated conference approval thresholds. Added guidance for pre-approval of annual conferences. Deleted bundling authority for VAAA.	CTMRO CTCCS	OMB Memorandum M-17-08  OGC Conference Clarification Opinion (VAIQ 7713724)	December 2016



Section	Revision	Office	Reason for Change	Effective Date
100501.0 3	Clarified content of quarterly memorandum on VA's conference policy compliance.	CTMRO CTCCS	VA OIG Audit, 15-01227-129	December 2016
100501.0 4	Deleted bundling authority for VAAA.	CTMRO CTCCS	OGC Conference Clarification Opinion (VAIQ 7713724)	December 2016
100502.0 1	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 CTCCS	OMB Memorandum M-17-08	December 2016
100502.0 2	Updated conference approval thresholds. Added guidance for pre-approval of annual conferences.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100502.0 3	Removed purchase card oversight verbiage covered in Vol XVI Ch 1 and gifts and gratuities covered in Vol XIV Ch 9	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100503	Updated conference approval thresholds and removed need to elevate approval when officials attend.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
1006	Added reference and link to OMB M-17-08.	CTMRO CTCCS	OMB Memorandum M-17-08	December 2016
100701	Updated version of previous Volume XIV Travel - Chapter 10, "Conference Planning, Reporting, and Oversight"	CTMRO CTCCS	Administrative update	December 2016

Section	Revision	Office	Reason for Change	Effective Date
Appendix A	Incorporated conference approval threshold changes.	CTMRO CTCCS	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 CTCCS	Administrative update  OMB Memorandum M-17-08	December 2016
1001	Added authority for VA OIG employees to follow VA 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; CTMROCTCCS compliance review and reporting. Updated ASM/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 (Table 1); re-delegation memo for conferences up to \$100K must be provided to CTMROCTCCS; attendee list must be in the Conference Oversight and Reporting Knowledgebase (CORK); CTMROCTCCS compliance review and reporting to ASM/CFO and ASM/CFO reporting.	OFP (047G)	VA OIG Audit, 15-01227-129; General Policy Update	October 2016

Section	Revision	Office	Reason for Change	Effective Date
	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 Champion (EC) appointment and function level requirement, and approval requirements (Table 3).  Removed notifying approver if cost exceeds estimate.	OFP (047G)	General Policy Update	October 2016
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

Section	Revision	Office	Reason for Change	Effective Date
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	Remove FTR references and 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	OFP (047G)	General Policy Update	October 2016
Appendix B	Replaced current App. B with new Conference Compliance Procedures.	OFP (047G)	General Policy Update	October 2016

## Appendix B: Instructions to Traveler (ITT) for VA Conferences

The below Instructions to Traveler (ITT) covers the minimum requirements that will be sent to those attending VA sponsored or co-sponsored conferences.

- A. Conference name, CORK ID, dates, location, 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 Volume XVI, Chapter 1A, Administrative Actions for Government Purchase Cards, and Volume XVI, Chapter 1B, Government Purchase Card for Micro-Purchases).
- C. Remind all employees not to accept individual gifts unless authorized under the ethics regulations. RCE's and employees must consult with OGC's Ethics Specialty Team for guidance where necessary.
- 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. Guidance if meals are provided at the conference and requirements to reduce per diem on attendee's travel claim where necessary.
- G. Identify documentation requirements on the TA. For example, attach:
  - The ITT, VA Form 10079, Cost Comparison Worksheet for Privately Owned Vehicle (POV) Versus Common Carrier Transportation 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 Official Travel Cost Comparison Worksheet when the employee chooses an indirect route or rental car at TDY location in lieu of alternative ground transportation, etc.
- H. Lodging reservation information, including guidance if lodging is not available at the per diem rate at the conference site (FTR § 301-74.6).
- I. Identify if hotel tax exemption is applicable at the conference site, providing forms or required documentation.
- J. Reduction of meals from M&IE, when meals are provided by or included in the registration fee paid for by the government.
- K. Provide copies of the signed approval memorandum authorizing lodging, meals, or both for local travelers and the requirement to attach the memo to their TA. CTCCS

will perform a policy compliance review before approval memorandums authorizing lodging and/or meals as a “necessary expense” in the local area obtain the requisite approval. Reference Volume XIV, Chapter 7.

- L. Travel claim instruction, e.g., time limit on filing and travel claim receipt requirements (reference Volume XIV, Chapter 1, Travel Administration, for requirements).
- M. Requirement to select purpose code “conference” and the applicable “Conference Title” associated to the traveler’s organization, conference location, and conference dates. Travelers will not be able to complete the TA properly without the approved conference details in the VA Travel System.
- N. Remind all employees in the event travel plans change and conference attendance is cancelled:
  - 1. Cancel transportation and lodging reservations in a timely manner. For additional guidance, reference Volume XIV, Chapter 2, Travel Per Diem.
  - 2. Seek a refund of the registration fee or reimburse VA in accordance with FTR § 301-74.24.

Appendix C: Office of General Council Memorandum, “Conference Clarification”

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Department of  
Veterans Affairs

## Memorandum

**Date:** October 26, 2016  
**From:** Deputy General Counsel for Legal Policy (02LP)  
**Subj:** Conference Clarification (VAIQ 7713724)  
**To:** Interim Assistant Secretary for Management and Interim Chief Financial Officer (004)

1. This refers to the subject memorandum requesting a legal opinion on proposed VA policy that provides clarification for certain types of events within VA that should not be considered reportable conferences per Office of Management and Budget (OMB) Memorandum M-12-12, “Promoting Efficient Spending to Support Agency Operations,” General Services Administration (GSA) Bulletin FTR 14-02, “Clarification of Agency Reporting Requirements for Conferences,” and 38 U.S.C. § 517, “Quarterly reports to Congress on conferences sponsored by the Department.”
2. We have reviewed the proposed new policy clarification, including the definitions of “mission . . . (operational)” meetings and “training”. While we believe that the proposed policy is consistent with the OMB and GSA guidance, we are of the opinion that it is not consistent with the 38 U.S.C. § 517 definition of “covered conference” for the reasons discussed below.
3. The proposed policy on mission (operational) meetings and training is consistent with the GSA clarification bulletin and would suitably address requirements imposed by OMB Memorandum M-12-12 and section 739 of division E of the Consolidated Appropriations Act, 2016 (Public Law 114-113). We have no legal objection to the proposed policy clarification with respect to OMB and appropriations act approval and reporting requirements.
4. With respect to 38 U.S.C. § 517, however, we note that section 517 (which was added by section 707 of Public Law 112-154), defines “covered conference” for purposes of its reporting requirements as “a conference, meeting, or other similar forum that is sponsored or co-sponsored by the Department and is - (1) attended by 50 or more individuals, including one or more employees of the Department; or (2) estimated to cost the Department at least \$20,000.”
5. The meaning of section 517 appears plain that VA is required to report on “covered conferences”, which specifically includes a “meeting, or other similar forum” with the only exceptions being for meetings or forums below the thresholds for number of participants and cost.

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Page 2.

Interim Assistant Secretary for Management and Interim Chief Financial Officer (004)

6. We also note that, in 2011, in written and oral testimony, VA objected to an early version of what became 38 U.S.C. § 517 (H.R. 2302) on the basis that it “captures the majority of operational meetings that are planned in the day-to-day administration of VA’s large health care, benefits and cemetery systems. Because of the low participant and dollar thresholds, it would include minor gatherings and those events that feature a substantial virtual component. The bill’s requirements would hinder the Department’s ability to effectively plan day-to-day business activities and meet emerging business needs, and would not provide any additional value to the current review process.” See *Hearing Transcript on Legislative Hearing on H.R. 1911, H.R. 240, H.R. 1263, H.R. 120, H.R. 2274, H.R. 2301, H.R. 2302, H.R. 2345, and H.R. 2329* (July 7, 2011). Following the 2011 legislative hearing, Congress revised the bill to raise the attendee threshold from 20 to 50 or more individuals and the total cost threshold from \$5,000 to \$20,000. However, despite VA’s publicly-voiced opposition to the bill because it captured “operational meetings” involving VA’s day-to-day administration, Congress retained the word “meeting” in the definition of “covered conference”, strongly suggesting that it intended to encompass larger meetings notwithstanding that they may relate to day-to-day administrative matters.

7. Accordingly, consistent with the plain language of 38 U.S.C. § 517 and VA’s stated interpretation of the bill language that preceded the enactment of section 517, we conclude that the section 517 reporting requirements apply to any meetings: (1) attended by 50 or more individuals, including one or more employees of the Department; or (2) estimated to cost the Department at least \$20,000. However, they do not apply to the other events and training courses described in your memorandum, i.e., Veteran 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, and formal classroom training coursework at established governmental or commercial training facilities. VA policy should not exempt operational meetings from the 38 U.S.C. § 517 reporting requirements.

8. We recognize that this means that two different standards apply to: (1) OMB Memorandum M-12-12 and Appropriations Act reporting; and (2) 38 U.S.C. § 517 reporting. Regrettably, we are unable to reach a different result. If the Department chooses to pursue a legislative proposal to amend 38 U.S.C. § 517, we will be available to provide legal assistance.

9. If additional questions arise, please contact Lisa Hardzog at (202) 461-4900.



Richard J. Hipolit



Department of  
Veterans Affairs

# Memorandum

Date: **SEP 09 2016**

From: Interim Assistant Secretary for Management and Interim Chief Financial Officer (004)

Subj: Conference Clarification (VAIQ# 7713724)

To: General Counsel (02)

1. The purpose of this memorandum is to request a legal opinion on whether or not "mission-type" events and internal training programs offered by Veterans Affairs (VA) training centers can be excluded from the conference reporting process and requirements.
2. Please provide an opinion on whether VA may categorize the following types of events as "mission-type" events in order to exclude them from the conference reporting process and requirements per General Services Administration (GSA) Bulletin Federal Travel Regulation (FTR) 14-02, Clarification of Agency Reporting Requirements for Conferences:
  - a. Meetings necessary to carry out:
    - 1) Routine, statutory command and staff oversight functions, such as investigations, inspections, audits, or non-conference planning site visits.
    - 2) Internal agency business matters, such as meetings that take place as part of an organization's regular course of daily business.
    - 3) Planning or execution of routine operational exercise activities, such as patient care, claims processing, and burial activities.
  - b. Events where VA personnel must participate in:
    - 1) Veterans outreach programs.
    - 2) Change of command, groundbreaking, official military award, funeral, or other such ceremonies.
    - 3) Civilian recruiting or recruitment advertising.
  - c. Meetings of advisory committees where one or more of the members is not a full-time or permanent part-time Federal officer or employee.
3. Please provide an opinion on whether VA can define internal training programs conducted by or at VA training centers such as VA Acquisition Academy Training, Law Enforcement Training, Veterans Benefits Administration Challenge Training, National Cemetery Administration (NCA) Representative Training, and NCA Caretaker Training as non-conference training. These non-conference training events will be excluded

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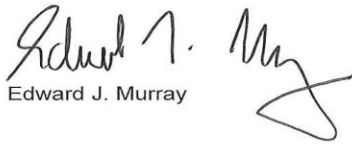
Conference Clarification (VAIQ# 7713724)

from the conference reporting process and requirements. Additionally, routine agency training held at contractor facilities should likewise be excluded from the "conference" definition.

4. Specific laws and regulations governing VA conferences are listed below.

- a. 41 Code of Federal Regulations § 300-1
- b. 38 United States Code §517 (c)
- c. FTR § 300.3-1
- d. FTR Chapter 301, Appendix C
- e. Office of Management and Budget Memorandum, M-12-12, Promoting Efficient Spending to Support Agency Operations
- f. GSA Bulletin FTR 14-02

5. Thank you for your consideration of this request. If you have any questions, please contact John Adams, Director, Corporate Travel and Reporting Office, at 202-461-6505.

  
Edward J. Murray

## Appendix D: Delegation of Authority for In-Person Events with More than 50 Participants



THE SECRETARY OF VETERANS AFFAIRS  
WASHINGTON

July 6, 2022

### MEMORANDUM FOR UNDER SECRETARIES, ASSISTANT SECRETARIES AND OTHER KEY OFFICIALS

**SUBJECT:** Delegation of Authority for In-Person Events with More than 50 Participants (VIEWS 7303732)

**1. DELEGATION.** This memorandum delegates to the following officials the authority to take the actions identified for in-person events hosted by the Department of Veterans Affairs (VA) with more than 50 participants, subject to the restrictions in paragraph 4 below:

- a. The Under Secretary for Health is delegated the authority to approve requests for Veterans Health Administration-sponsored events, for both health care and non-health care settings.
- b. The Under Secretary for Benefits is delegated the authority to approve requests for Veterans Benefits Administration-sponsored events.
- c. The Under Secretary for Memorial Affairs is delegated the authority to approve requests for National Cemetery Administration (NCA)-sponsored events.
- d. The Assistant Secretary for Human Resources and Administration/Operations, Security and Preparedness is delegated the authority to approve requests for Staff Office-sponsored events.

### 2. AUTHORITIES.

- a. [Safer Federal Workforce Taskforce](#), "COVID-19 Workplace Safety: Agency Model Safety Principles" (September 13, 2021).
- b. [38 U.S.C. § 512](#), Delegation of Authority; assignment of functions and duties.
- c. [VA Directive 0000](#), Delegations of Authority (November 14, 2018).

### 3. REFERENCES.

- a. [Executive Order 13991](#), "Protecting the Federal Workforce and Requiring Mask Wearing" (January 21, 2021).
- b. [OMB Memorandum M-21-15](#), "COVID-19 Safe Federal Workplace: Agency Model Safety Principles" (January 24, 2021).
- c. [NCA Directive 3170](#), "Ceremonies and Events at VA National Cemeteries" (December 15, 2017).

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Subj: Delegation of Authority for In-Person Events with More than 50 Participants  
(VIEWS 7303732)

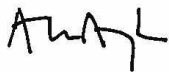
**4. RESTRICTIONS.**

- a. The approvals of events must be made in consultation with VA's COVID-19 Coordination Team.
- b. The authorities to approve events with greater than 50 participants should only be utilized when guidance from the Centers for Disease Control and Prevention (CDC), the [Safer Federal Workforce Task Force](#) and other relevant authorities require such authorization. As of the date of this delegation, approvals are required when the CDC COVID-19 Community Level is HIGH in non-health care settings or when the CDC COVID-19 Community Transmission Level is HIGH in health care settings.
- c. Approval is not required for NCA committal and memorial services, or ceremonies and events requested by external sponsoring organizations and held at VA national cemeteries consistent with NCA Directive 3170.
- d. This delegation of authority is concurrent with the Secretary's authority to make such determinations and does not preclude the Secretary from exercising, modifying or further delegating such authority.

**5. REDELEGATION.** No further redelegations are authorized.

**6. RESCISSION.** None.

**7. EFFECTIVE DATE.** This delegation is effective upon signature and remains in effect for four years or until otherwise rescinded, modified or superseded.



Denis McDonough

## Appendix E: Legislative and Federal Guidance Pertaining to VA Conference Reporting

VA's Conference reporting requirements can be found within:

- VA's Annual Appropriations Acts (most recently P.L. 117-103 FY2022);
- OMB Memorandum M-17-08, dated 2016; and
- 38 U.S.C. 517.

Each fiscal year, an Annual Appropriation Act is passed into law containing numerous conference related requirements. However, because the law is often a consolidated appropriations act encompassing the budget of multiple Departments, not all of the conference requirements contained in the act apply to VA. OFP working with Office of General Counsel, VA Administrations and the Financial Services Center have addressed the following questions to help staff better understand and identify what requirements are applicable to VA. The information below uses the FY22 Appropriations Act (the Public Law reference changes each year) for illustration purposes and can be used as a guide for locating conference information in future Appropriations Acts:

Question 1: Which conference reporting requirements outlined in P.L. 117-103 specifically apply to VA?

Response 1: The following sections of P.L. 117-103 are applicable to VA.

- Division E – Financial Services and General Government Appropriations Act, 2022
  - Title VII – General provisions- Government wide (p. 245)
- Division J – Military Construction, Veterans Affairs, and Related Agencies Appropriations Act, 2022
  - Title II – Department of Veterans Affairs (p. 493)
  - Title IV – General Provisions

Question 2: Which type of conference (Sponsored/co-sponsored and/or Federal non-VA sponsored conferences) is to be reported per P.L. 117-103?

Response 2: Section 738 of Division E, Title VII is the only section of P.L. 117-103 that applies to VA in regards to conference reporting. Section 738 requires:

- The head of any Executive branch department, agency, board, commission, or office funded by this or any other appropriations Act shall submit annual reports to the Inspector General or senior ethics official for any entity without an Inspector General, regarding the costs and contracting procedures related to each conference held by any such department, agency, board, commission, or office during fiscal year 2022 for which the cost to the United States Government was more than \$100,000.
- Within 15 days after the end of a quarter, the head of any such department, agency, board, commission, or office shall notify the Inspector General or senior ethics official for any entity without an Inspector General, of the date, location,

and number of employees attending a conference held by any Executive branch department, agency, board, commission, or office funded by this or any other appropriations Act during fiscal year 2022 for which the cost to the United States Government was more than \$20,000.

OFP interprets the first bullet to mean, report annually for all VA sponsored conferences > \$100K. We think this because of the sentence structure in “regarding the costs and contracting procedures related to each conference *held by any such* department”. Secondly it requires contracting costs and procedures which would only apply if VA were hosting a conference.

OFP interprets the second bullet to mean, quarterly reporting for all VA sponsored conferences >\$20K. Per OMB Memorandum M-17-08, agencies “should” focus on oversight of expenses related to Federally-sponsored and Federally-hosted conferences. In addition, 38 U.S.C. 517 requires agencies to report sponsored conferences attended by more than 50 people or costing the department \$20K or more.

Question 3: Is the conference reporting requirement delegable?

Response 3: Yes, reporting has been historically delegated in VA. In September 2021, SECVA signed a delegation of authority for travel and conference approval and reporting to appropriate senior leaders within VA. Specifically, conference reporting was delegated from SECVA to ASM/CFO who has further delegated via policy to FSC. Refer to Volume XIV, Chapter 1 Travel Administration, Appendix B for details on the delegation.