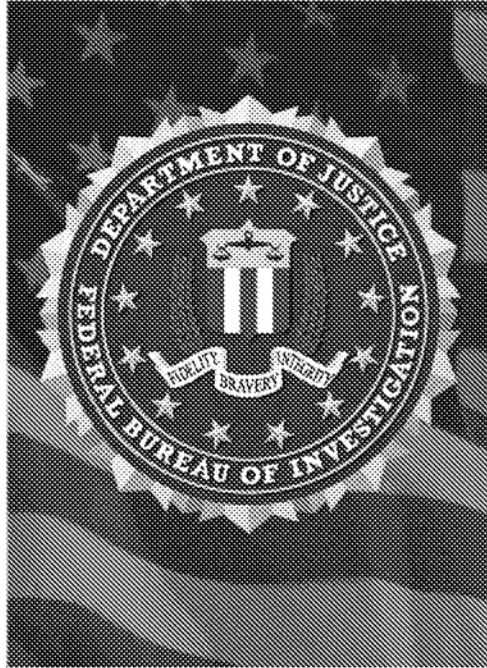


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Conference and Event Policy Guide

Conference and Event Policy Guide



Federal Bureau of Investigation

Training Division

1040PG

March 21, 2019

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Approvals

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Sponsoring Executive Approval	Donald Alway Assistant Director Training Division
Stakeholder Executive Approval	Richard L. Haley II Assistant Director Finance and Facilities Division
Stakeholder Executive Approval	Andrew W. Vale Executive Assistant Director Human Resources Branch
Final Approval	Paul M. Abbate Associate Deputy Director

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General Information

Questions or comments pertaining to this policy guide (PG) can be directed to:
Federal Bureau of Investigation Headquarters (FBIHQ), Training Division (TD)
Policy point of contact (POC): unit chief (UC), Training Coordination and Support Unit (TCSU),



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Supersession Information

This document supersedes Policy Directive (PD) 0668D, *FBI Conference and Event Planning*; the *Non-FBI-Sponsored Conference and Event Policy Guide*, PG 0668PG; the *FBI-Sponsored Conference and Event Policy Guide*, 0668PG-2; and PD 0927D, *Conference Planning – Conference Cost Reporting and Approvals to Use Nonfederal Facilities*.

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Revision Log

The revision log documents substantive changes made to the previous version of the PD 0668D, *FBI Conference and Event Planning*; the *Non-FBI-Sponsored Conference and Event Policy Guide*, 0668PG; the *FBI-Sponsored Conference and Event Policy Guide*, PG 0668PG-2; and PD 0927D, *Conference Planning – Conference Cost Reporting and Approvals to Use Nonfederal Facilities*, published on February 12, 2014.

Revised Section Number and Title	Deleted Section Number and Title
All four policies – 0668D, 0668PG, 0668PG-2, and 0927D have been merged into one policy	

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1. Introduction

1.1. Purpose

The purpose of this policy guide (PG) is to provide guidance for requesting, processing, registering, and approving both Federal Bureau of Investigation (FBI)-sponsored conferences and training events and external training events.

1.2. Scope

This PG is applicable to all FBI Headquarters (FBIHQ) divisions, field offices (FOs), legal attaché (Legat) offices, and personnel responsible for coordinating or attending FBI-sponsored conferences or training events or external training events.

All conferences and event requests (see [Appendix E](#) for definitions) must be entered into the Training Division (TD) system, currently known as the [Event Request System](#) (ERS).

1.3. Exemptions

The following meetings or activities do not need to be entered into ERS unless an event authorization number (EAN) is needed for travel:

- Routine operational meetings (e.g., staff meetings) and site visits, if held in a federal facility and there is no cost to the Department of Justice (DOJ) for logistical conference planners or government-provided food or beverages.
- Law enforcement operational activities, including staging, surveillance, investigation, intelligence, and undercover activities.
- Special events (e.g., job fairs, memorial services, and award ceremonies) and events funded exclusively with representation funds. If a special event is part of a larger event that otherwise qualifies as a conference, as defined by the Federal Travel Regulation (FTR), it requires an ERS entry.

Exemptions from DOJ approval and reporting requirements can be found in [subsection 4.2.5.3](#).

2. Roles and Responsibilities

2.1. Training Coordination and Support Unit (TCSU), Training Division

TCSU, TD must:

- Review, monitor, and audit events to ensure compliance with applicable FBI, DOJ, and Office of Personnel Management (OPM) rules, regulations, laws, and policies.
- Collaborate with the Finance Division (FD), Office of the General Counsel (OGC), and the Office of Integrity and Compliance (OIC) to ensure that the event planning, processing, reporting, and auditing requirements are met.
- Request FBIHQ divisions to annually submit Training Development and Delivery Plans (TDDPs) that include all prioritized division requirements for events.
- Analyze each event request through venue market research to ensure that the venue chosen is fiscally prudent.
- Determine what approvals are required for each event request and prepare all necessary documents for submission.
- Determine whether an event is exempt from the DOJ approval and reporting requirements in accordance with DOJ Policy Statement (PS) 1400.01, Planning, Approving, Attending, and Reporting Conferences (March 2018).
- Collect all reportable cost elements and submit the quarterly report in the DOJ required format to FFD no later than 30 calendar days following the close of each fiscal quarter.
- Issue EANs for travel reimbursement. By way of background, EANs replaced travel request (TR) numbers.
- Collect and report all FBI training data to meet DOJ and OPM reporting mandates.
- Determine whether the conference or training event should be entered into the Virtual Academy (VA) course catalog.

2.2. FBI Headquarters Division and Field Office Heads

FBIHQ division heads (i.e., assistant directors [ADs]) and FO heads (i.e., assistant directors in charge [ADICs] and special agents in charge [SACs]) must review and approve or deny all conferences and training events for their divisions'/FOs' annual TDDPs.

2.3. Class Coordinators (CCs) and Financial Managers (FMs) for Coordinating FBI Headquarters Divisions and Field Offices

The CC or FM for the coordinating FBIHQ division or FO must:

- Coordinate all conferences and training events with TD through ERS.
- Submit a request in ERS 120 days prior to the start date of each FBI-sponsored event to ensure that enough time is allotted for acquiring outside approvals, if required.
- Submit a request for attendance of an external training event in ERS 60 days prior to the start date of the event to ensure enough time for acquiring outside approvals, if required.

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- Ensure that external training requests are applicable to requestors' current jobs and collateral duties.
- Ensure vendor payment.
- Consider available online training or alternative methods of acquiring training at no cost.
- Oversee training funding, coordinating with FFD's Procurement Section (PS) on the appropriate purchasing process for event needs.
- Ensure that training costs above \$3500 for Legats are processed through the International Operations Division (IOD).
- Ensure that requests for the use of counterintelligence official reception and representation expenses (CORRE) and representation funds have the necessary approval in the CORRE/REP system of record. See PD 0925D, Counterintelligence Official Reception and Representation Expenses (CORRE) and Representation Funds.
- Attach copies of purchase orders (POs), vendor billing statements, and other supporting documentation to the event request in ERS.
- Close out events in ERS by entering all nonvoucher costs (e.g., conference space, trainer, guest speaker, supplies, printing, and A/V [audio-visual services]) and explain any cost variance.
- Notify TCSU of any changes to events (e.g., dates, locations, facilities, or participants).
- Comply with the Virtual Academy Policy Directive and Policy Guide, 0747DPG.
- Coordinate all new courses with TD's Registrar's Office.

2.4. FBI Students

2.4.1. FBI-Sponsored Events

For an FBI-sponsored event, an FBI student must:

- Register for the courses in VA in accordance with the Virtual Academy Policy Directive and Policy Guide, 0747DPG.
- Verify approval to attend the event.
- Adhere to DOJ travel policies.
- Submit an electronic FD-1103, "Travel Request Form," in the Travel Request Initiation and Payment (TRIP) system (in the Enterprise Process Automation System [EPAS]) prior to traveling for the event.
- Submit a travel voucher in TRIP within five days of returning from travel. The student must include only the costs incurred during the conference or on approved travel days. Costs for additional travel on extra days must not be charged to the EAN.
- Ensure that proper approvals for being in travel status have been granted via the TRIP system.

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2.4.2. External Training Events

For an external training event, an FBI student must:

- Submit an external training request in ERS.
- Confirm approval to attend the event.
- Provide the approved Standard Form (SF)-182, "Authorization, Agreement and Certification of Training," to the vendor for billing information.
- Adhere to DOJ travel policies.
- Submit an electronic FD-1103, "Travel Request Form," in TRIP prior to traveling for the event.
- Submit a travel voucher in TRIP within five days of returning from travel. The student must include only the costs incurred during the conference or on approved travel days. Costs for additional travel on extra days must not be charged to the EAN.

2.5. Non-FBI Students

Non-FBI students (i.e., the FBI's criminal justice and intelligence partners) not assigned to an FBI task force must register for courses and events in the Internet-based VA. If a non-FBI student's agency is not registered in the VA, the student must contact the local FBI FO to register the agency in the Internet-based VA.

2.6. Office of the General Counsel

At TD's request, and prior to travel occurring, OGC must review and approve or deny the use of appropriated funds (other than representation funds) to pay for transportation expenses incurred by nonfederal persons attending an event.

2.7. Office of Integrity and Compliance

At TD's request, OIC must review and the deputy designated agency ethics official (DDAEO)/AD, OIC must approve or deny the acceptance of a gift for the free use of space at a nonfederal facility or for free instructor or speaker engagements prior to the event.

2.8. Associate Deputy Director (ADD)

The ADD must:

- Approve or deny event requests received from TD in accordance with DOJ PS 1400.01, Planning, Approving, Attending, and Reporting Conferences.
- Review and approve quarterly report submissions received from TD in accordance with DOJ PS 1400.01.

2.9. Finance Division

2.9.1. Assistant Director

The AD of FD must:

- Approve or deny event requests received from TD in accordance with DOJ PS 1400.01, Planning, Approving, Attending, and Reporting Conferences.

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- Approve or deny the use of appropriated funds, as appropriate (including CORRE and representation funds). See PD 0925D, Counterintelligence Official Reception and Representation Expenses (CORRE) and Representation Funds.

2.9.2. Audit Unit (AU)

AU must:

- Review event requests submitted by TD for accuracy and compliance with DOJ PS 1400.01, Planning, Approving, Attending, and Reporting Conferences, prior to submitting them to the AD of FD for approval.
- Submit the following DOJ-required documents, found as attachments to DOJ PS 1400.01, to the ADD for approval:
 - “Department of Justice-Sponsored Conference Request and Report” (Attachment 1)
 - “Component Certification” (Attachment 2)
 - “Attendance at Conferences Held Outside the United States” (Attachment 3)
 - “Attendance at Non-Department-Sponsored Conference Report” (Attachment 4)
- Submit ADD-approved event requests to DOJ via electronic mail (e-mail) as required by DOJ PS 1400.01.
- Review the quarterly report submissions received from TD for compliance with DOJ and FBI policies.
- Submit quarterly conference reports to the ADD for approval.
- Submit ADD-approved conference reports to DOJ via e-mail no later than 45 calendar days following the close of the fiscal quarter.
- Conduct quarterly audits and ensure compliance with all applicable policies and procedures.
- Monitor the internal controls related to planning, approving, and reporting FBI-sponsored and external training events as required by Office of Management and Budget (OMB) Circular A-123, *Management’s Responsibility for Enterprise Risk Management and Internal Control.*
- Provide to TCSU a description of the contracting procedures used for events held in nonfederal facilities, including confirmation that contracts were awarded on a competitive bases and that cost comparisons were conducted in evaluating potential vendors.
- Provide to TCSU a copy of all signed financial documents (e.g., contracts, letters of intent [LOIs], purchase orders).

2.10. Security Division (SecD)

SecD must provide to TD written confirmation for any classified event, stating that the use of a non-FBI facility meets the Physical Security Unit’s (PSU), SecD current security requirements for classified discussions and is approved for the classified event.

3. Policy Statement

TCSU is responsible for ensuring compliance with applicable FBI, DOJ, OPM, and FTR rules, regulations, laws, and policies for all FBI conference and training events.

The FTR defines a conference, in part, as a meeting, a retreat, a seminar, a symposium or a training activity (41 C.F.R. § 300-3.1). A conference is typically a prearranged event with designated participants and/or registration, a published substantive agenda, and scheduled speakers or discussion panels on a particular topic.

All requests to hold events, regardless of cost, or to attend external training (in any capacity, including as a student, an instructor, a presenter, a facilitator, a liaison, and so on) must be submitted to TD in accordance with the procedures set forth in this policy. Only TD may determine whether or not an exemption to the conference approval and reporting requirements applies. TD must also determine the levels of FBI and/or DOJ approval required, given the specific circumstances of the event request.

When planning a conference, the sponsoring division or FO must minimize conference costs, including travel, time, facility, and administrative costs; refrain from using government funds for food, beverages, and other items, as described in this policy; and use government funds only for work-related conference expenditures.

Failure to comply with any part of this policy prior to holding a conference will result in the conference not being approved. If policy noncompliance occurs, FD's AU may refer the conference and personnel associated with the noncompliance to the Inspection Division (INSD). Examples of noncompliance include:

- Sending additional attendees to non-DOJ-sponsored events beyond approved attendee levels, thus exceeding the approved monetary threshold.
- Conducting a conference without the appropriate FBI and/or DOJ approvals.
- Purchasing (light) refreshments for an event without DOJ approval.
- Purchasing trinkets or paying for entertainment.

4. Processes and Procedures

4.1. Event Planning

4.1.1. Training Development and Delivery Plans

Each year, FBIHQ divisions are responsible for submitting TDDPs using ERS. The TDDP is a planning tool that captures each division's plan for training that addresses its mission, priorities, and Threat Review and Prioritization (TRP) process. This plan involves both the development of training and the delivery of all types of events. Completion of the TDDP is required prior to the yearly budget cycle, the Zero-Based Resource Allocation (ZBRA) process. Entering planned training activities into the TDDP does not guarantee funding for the events.

More information on the TDDP processes can be found on the [TDDP BUNET page](#).

4.1.2. Cost Guidelines

4.1.2.1. Locations and Facilities

When planning a conference or an event, the sponsoring division or FO must comply with the following:

- Maximize the use of government-owned and government-provided conference facilities.
- 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).
- Avoid locations that may give rise to appearance issues (e.g., resorts, luxurious venues, and so on).

4.1.2.2. Meals and Refreshments

When planning a conference or an event, the sponsoring division or FO must comply with the following:

- Refrain from using government funds for meals and refreshments, which are generally considered personal expenses.
 - A rare exception may be authorized for working meals at a conference that are necessary to accomplish official business and enhance the cost effectiveness of the conference. In order to use government funds to provide meals to federal employees attending conferences or training sessions, all three of the following conditions must be satisfied:
 - The meals are incidental to the conference or training.
 - Attendance at the meals is important for the host agency to ensure attendees' full participation in essential discussions, lectures, or speeches concerning the purpose of the conference or training.
 - The meals are part of a conference or training that includes not just the meals and discussions, speeches, lectures, or other business that may take place when the meals are served, but also substantial functions occurring separately from when the food is served.

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- If all three conditions have been satisfied, meals may also be provided to employees who are attending conferences or training sessions within their official duty stations, and the explanation must be included in the request in the training system of record.
- Provide meals to nonfederal attendees at conferences only if one of the following applies:
 - The FBI has specific statutory authority permitting it (e.g., Title 42 United States Code [U.S.C.] Section [§] 3788(f) for programs covered by the Omnibus Crime Control and Safe Streets Act; 42 U.S.C. § 3771 and note).
 - The nonfederal attendees qualify as individuals serving the Department pursuant to 5 U.S.C. § 5703.
 - The expenses can be considered “official reception and representation expenses” (28 U.S.C. § 530 C(b)(1)(D)), are appropriately approved as such, and are counted toward the Department’s representation fund limitations (see DOJ Order 2110 31B, Expenditures of Representation Funds).
- The cost of any meal (i.e., continental breakfast, breakfast, lunch, or dinner), plus gratuities and hotel service costs, must not exceed 150 percent of the individual meal allocation for the geographical location. For example, in a geographical location where the meals and incidental expenses (M&IE) rate is \$61 and the dinner allocation is \$34, the maximum cost of the dinner for an FBI-sponsored conference or training session must not exceed \$51 (\$34 x 150 percent) per person.
- Although meals may be permissible within the 150 percent of the per diem, government funds are generally not available to provide refreshments. If a component determines that providing food and beverages at a refreshment break is necessary based on the unique and extenuating circumstances of the conference, AAG/A approval is required. Food may only be provided during receptions where it is purchased with representation funds in accordance with PD 0925D, Counterintelligence Official Reception and Representation Expenses (CORRE) and Representation Funds.

4.1.2.3. Other Costs

When planning a conference or an event, the sponsoring division or FO must comply with the following:

- Refrain from using government funds to pay for entertainment costs, including, but not limited to, amusement, social activities, tickets to shows or sporting events, space rental only for social or entertainment purposes, transportation, and gratuities.
- Refrain from purchasing trinkets (e.g., hats, mugs, portfolios, t-shirts, coins, lapel pins, lanyards) as giveaways for conference attendees, regardless of whether they include the FBI logo or the conference name. The only exception to this prohibition is for items properly purchased with representation funds.
- Use government funds only for work-related expenditures. Basic supplies that are necessary for use during the conference (e.g., pens, paper, and name tags) may be purchased.

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4.2. FBI-Sponsored Event Execution

4.2.1. Submitting an Event Request

All events must be submitted in ERS using the Event Request tool.

4.2.2. FBI-Sponsored Event Approvals

Once a requester submits an event in ERS, the requestor's training coordinator (TC) must review and approve or deny the request in ERS. After the TC approves, the requestor's financial manager (FM) must review the request and, if approving the event, must set the funding strip (i.e., the program, subprogram, and so on), which creates the EAN. Upon FM approval, TD must process the request in ERS, obtain any internal and external approvals required, and ensure compliance with applicable DOJ policies. Depending on the details of the event, approvals may be required from FD, ADD, DOJ, SecD, OIC and/or OGC.

4.2.2.1. No-Cost Events

No-cost events must be entered into ERS using the Event Request tool. With a no-cost event, the TC is the only individual who is required to review and approve. FM approval is not required unless TD determines that there is a cost associated with the event.

4.2.3. Publishing the Event in Virtual Academy

Once an ERS event request is entered by the event requestor and approved through the process, TD must set the approval path and publish the event for enrollment in VA.

For policy guidance on the VA, review the [Virtual Academy Policy Directive and Policy Guide 0747DPG](#).

For job aids to assist with using the VA, visit the [VA BUNET site](#).

4.2.4. Training Division Review

In accordance with current DOJ policies and the Federal Acquisition Regulation (FAR), when selecting an event location, facilities in multiple cities must be compared, unless an overriding operational reason is documented to hold the event in a specific city. All comparison information must be considered in the determination of site selection and be documented in a market analysis. TD must ensure that all events are held in the most cost-effective manner in compliance with the FTR (Title 41 Code of Federal Regulations [CFR] Chapters 300-304, General). This is accomplished through venue market research and analysis. Detailed instructions on this process can be found in the FTR (41 CFR 301-374, "Conference Planning").

After completing the market research and analysis, TD must coordinate, prepare, and forward to FD any required approval submissions. Approvals from SecD, OIC, and/or OGC may also be required.

4.2.5. Department of Justice Approval and Reporting Guidelines

4.2.5.1. DOJ Approval

The DOJ guidelines mandate that the DOJ is given a minimum of 90 days to review and approve the event submission. For internal processing, TD and FD require an additional 30 days to prepare the event for DOJ review. Therefore, an event that requires DOJ approval must be provided to TD via [ERS](#) no less than 120 days prior to the event start date to obtain the proper approvals. DOJ approval must be obtained before any contract with a vendor or a hotel may be

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signed. The funding division on the event request must contact FD's PS must prior to making financial commitments to any vendors (e.g., hotels).

For more DOJ approval guidelines, see DOJ PS 1400.01, Planning, Approving, Attending, and Reporting Conferences.

The following FBI-sponsored events require DOJ approval and must be submitted to TD no less than 120 days prior to the start date of the event:

- FBI-sponsored events estimated to cost over \$500,000, which are prohibited unless a waiver is granted by the Deputy Attorney General (DAG).
- FBI-sponsored events estimated to cost the FBI more than \$250,000, but less than \$500,000, which must be submitted to the assistant attorney general for administration (AAG/A) for approval.
- FBI-sponsored events in which refreshments are served. As a general rule, DOJ funds must not be used to provide refreshments as part of a refreshment break and/or as part of a reception (i.e., a welcoming, networking, social, or working reception). However, if TCSU determines that providing refreshments is necessary based on the unique and extenuating circumstances of the event, DOJ approval may be requested.
- FBI-sponsored events in which government-provided meals exceed the individual meal per diem by more than 150 percent.
- FBI-sponsored events in which conference space and A/V costs exceed \$25 per day per attendee or a total of \$20,000. Both of these limits are a combined threshold of conference space and A/V.
- FBI-sponsored events in which conference planners have been utilized and the cost threshold set below has been exceeded.
 - Personnel are prohibited from engaging the services of private event planning individuals or organizations, either for a fee or at no cost to the government, without prior approval from FD, OIC, and OGC. DOJ PS 1400.01, Planning, Approving, Attending, and Reporting Conferences, sets limits for the use of a programmatic conference planner to \$200 per attendee, not to exceed a total cost of \$35,000 per event. DOJ policy sets limits for the use of a logistical conference planner to \$50 per attendee, not to exceed a cumulative cost total of \$8750 per event. If these limitations are exceeded, the costs must be justified and approved by DOJ before the event may occur.

4.2.5.2. DOJ Reporting

DOJ requires the FBI to report the actual costs of all events that received DOJ approval, along with other events that meet the DOJ reporting criteria.

Unless specifically exempted by DOJ policy, all FBI-sponsored events with a total cost exceeding \$20,000 (including travel and per diem associated with the events, but not including the salaries of the federal employees involved) and external training events (regardless of cost) must be reported to DOJ. Any event held by the FBI, whether or not it is approved and/or reportable to DOJ, may be subject to an Office of the Inspector General (OIG) audit.

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TD compiles this report, but requires the assistance of the sponsoring FBIHQ division or FO to gather the information by closing out the event in ERS. The CC or FM is responsible for obtaining:

- Actual costs that are not vouchered by the participants. This includes, but is not limited to, instructor costs, costs of renting space at a hotel or a conference facility, meals provided to students, A/V expenses, supplies, transportation (e.g., bus, van), and any costs charged to the FBI for outside event planners or cooperative agreements.
- Explanations of significant variances between the actual and estimated costs that were previously approved by DOJ.

See subsection 2.3. for additional requirements for CCs and FMs.

In an FBI-sponsored event, all costs being paid by DOJ (vouchered and nonvouchered costs), regardless of whether the FBI is paying them, must be included in the total cost of the event. This includes any cost associated with the event that was paid by another DOJ component.

The report must be reviewed and approved by FD prior to submission to DOJ.

4.2.5.3. Exemptions From DOJ Approvals and Reporting

The below meetings or activities are exempt from DOJ approval and reporting requirements, but may require an ERS action. TD must make the final determination in consultation with OGC, as appropriate, and will advise the coordinating FBIHQ division or FO whether or not an ERS action is required.

- Training courses taught at federal training centers, such as the FBI Academy.
- Training courses taught at other federal facilities where there are no costs for logistical conference planners or government-provided food or beverages.
- Awards ceremonies that are not part of events that otherwise qualify as conferences.
- Conferences held by grant recipients.
- Special events that are not part of larger events that otherwise qualify as conferences (e.g., equal employment opportunity [EEO] diversity programs, job fairs, and memorial services) and events funded exclusively with representation funds.
- Routine operational meetings (e.g., staff meetings and all-hands meetings) and site visits, if held in federal facilities and if there are no costs for conference planning or government-provided meals or refreshments.
- Meetings held for the purposes of planning, staging, or conducting surveillance and undercover activities when these activities are directly related to an ongoing or imminent law enforcement operation.
- Meetings to coordinate investigative, intelligence, or prosecutorial efforts in connection with a pending case, a specific criminal activity, or a threat against the United States, including meetings at law enforcement or security operational centers (e.g., those established for special events like the Super Bowl).
- Testing, when the primary purpose of the event is to evaluate a job applicant's qualifications to perform a job. In order for a conference or an event to be excluded from

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the reporting requirement, the majority of the event must be dedicated to the administration and taking of a test. For example, the quarterly firearms certification would not be considered a conference.

- Video conferences and Webinars where there are no costs to the DOJ for logistical conference planning or government-provided food or beverages.
- Peer reviews, performed primarily by nonfederal independent evaluators, to evaluate grant and cooperative agreement applications, where there are no costs to the DOJ for government-provided food or beverages.
- Federal Advisory Committee meetings covered by 5 U.S.C. App. 2.
- International law enforcement and other foreign government training and capacity-building activities performed by the DOJ, on a reimbursable basis, for predominately non-United States (U.S.), non-DOJ attendees, whether held overseas or in the United States.
- Firearms training conducted at state or local government facilities if there are no costs for temporary duty (TDY) travel, logistical conference planning, or government-provided food or beverages.

4.2.6. Associate Deputy Director Approval Guidelines

The following events require ADD approval and must be submitted to TD no less than 60 days prior to the start date of the event:

- FBI-sponsored events estimated to cost the FBI more than \$100,000, but less than \$250,000.
- FBI-sponsored events that require DOJ approval, as stated in subsection 4.2.5.1.

4.2.7. Assistant Director, Finance Division Approval Guidelines

The following events require AD of FD approval and must be submitted to TD no less than 60 days prior to the start date of the event:

- FBI-sponsored events estimated to cost the FBI more than \$10,000, but less than \$100,000.
- FBI-sponsored events in which government-provided meals exceed the individual meal per diem by more than 150 percent.
- FBI-sponsored events where conference planners are utilized, but are within the thresholds stated in subsection 4.2.5.1.
- FBI-sponsored events requiring DOJ or ADD approval, as stated in subsections 4.2.5.1. and 4.2.6.

4.2.8. FBI Headquarters Division/Field Office Head Approval Guidelines

FBI-sponsored events estimated to cost the FBI less than \$10,000 must be approved by the FBIHQ division/FO head, subject to the following requirements:

- The event must not include refreshments.

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- The event must not include meals.
- The event must not include programmatic or logistical conference planners.
- The event must not exceed the thresholds for meeting space/AV stated in subsection 4.2.5.1.

In addition to the above requirements, the event must be held in one of the following facility types:

- A state or local law enforcement facility
- A state or local government facility
- A National Guard facility
- A college or a university
- A state park

If the event does not meet the requirements above, additional approval beyond the FBIHQ division/FO head is required, and the event will be subject to the cost thresholds set in subsections 4.2.5.1.–4.2.7.

4.2.9. Security Division Approval Guidelines

Classified events held in non-FBI facilities require approval by PSU, SecD. TD must not approve such an event without PSU's written verification that security requirements have been met. It is the responsibility of the sponsoring division/FO to request PSU's approval to use a facility for classified discussions. The request for PSU approval must be submitted 90 days prior to the event start date in order to allow SecD adequate time to review the request, inspect the facility, and make a determination regarding the space. Additional time is needed if the space has not been approved as a classified area, resulting in subsequent inspections. Additional time also is needed for events that require DOJ approval. TD must have PSU approval before requesting DOJ approval and before FD can issue a contractual agreement for the facility.

For more SecD approval guidelines, see PD 0597D, Selection of Locations for Classified Conferences.

4.2.10. Office of Integrity and Compliance Approval Guidelines on Free Space

Upon the FBI asking to use a nonfederal entity's space, and inquiring as to its cost (to avoid the unauthorized solicitation of a gift), the nonfederal entity may voluntarily offer to let the FBI use the space at no charge. In accordance with federal gift ethics laws and regulations and DOJ policy, the FBI Director's authority to accept donations of free space from nonfederal entities, to be used for predominantly internal training or conferences, has been redelegated to the FBI's DDAEO/AD, OIC.

Prior to the event, TD provides the required OIC questionnaire to OIC/DDAEO via ERS.

As necessary, OIC may contact the employee (and, if applicable, the CDC) for clarification of the above information.

The DDAEO/AD, OIC must enter into ERS the determination of whether to accept or to deny the offer of free space.

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Depending on the overall cost of the event, additional approval is required after OIC approval has been obtained. See subsections 4.2.5.1.–4.2.8. for approval thresholds.

4.2.11. Office of the General Counsel Approval Guidelines

Pursuant to 31 U.S.C. § 1345, titled Expenses of meetings, the FBI must not, without specific statutory authority, provide meals or light refreshments or pay for travel or transportation expenses for nonfederal (including foreign) individuals attending FBI-sponsored events. The only sources of funding generally available to pay for the meals, transportation, and travel expenses of nonfederal individuals are representation and CORRE funds. The criteria to request access to these funds is detailed in PD 0925D, Counterintelligence Official Reception and Representation Expenses (CORRE) and Representation Funds. It is the responsibility of the sponsoring division/FO to request the use of representation or CORRE funds.

Title 5 U.S.C. § 5703, titled Per diem, travel, and transportation expenses [...], provides an exception to 31 U.S.C. § 1345 and permits an agency to invite a nonfederal person (or more than one) to a meeting or a conference at government expense, but only if that individual is legitimately performing a “direct service” for the government. The “direct service” test is not satisfied when a nonfederal person attends a conference for mere liaison or networking purposes. However, if an invitee participates in a panel or makes a presentation at the conference, the direct service test is satisfied. Questions about whether a nonfederal person may attend a conference at government expense under 5 U.S.C. § 5903, Regulations, should be addressed to TCSU. TD must coordinate questions of “direct service” with applicable units in OGC.

Where individuals are to be treated as invitational travelers, it is important that each of them receive the appropriate paperwork to document his or her status. This may take the form of a letter asking the individual to attend the conference and explaining the expenses for which the FBI will pay.

Title 34 U.S.C. § 10211, titled Training and manpower development, provides another exception to 31 U.S.C. § 1345. Pursuant to this law, the FBI may use government funds to pay for state and local criminal justice personnel to attend training, as long as the training is requested or approved by the attendees’ employing agencies. Where attendance at training is justifiable under this provision, there is no need to determine whether attendees will be providing a direct service to the government.

4.3. FBI Academy Events

4.3.1. Submitting an Event Request

All events must be submitted in ERS using the Event Request tool.

4.3.2. FBI Academy Event Approvals

For events taking place at the FBI Academy, the approval process is the same as that described in subsection 4.2.2.

4.3.3. Lodging

TD must make all lodging assignments at the FBI Academy, using VA records as a source. Therefore, if a potential student is not enrolled through VA, no lodging arrangement will be made.

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4.3.4. Paying for Lodging and Meals

When participants stay at the FBI Academy, the funding division/FO will be charged for participant meals and lodging consistent with the Facilities and Logistics Services Division's (FLSD) current rates.

For events held at the FBI Academy, the funding division must provide funding for lodging and meals 30 days in advance of the course start date for the estimated number of participants attending. The event may be cancelled without financial penalty when TD is officially notified 14 days or more prior to the start date of the class. No refunds will be issued for lower-than-anticipated attendance; therefore, event coordinators should ensure that the estimated number of participants is achieved.

4.3.5. Travel to the FBI Academy for Training

All students traveling to the FBI Academy to attend training must obtain their airline reservations in accordance with guidance provided by the FD's [Travel Unit \(TU\)](#).

FBI-scheduled bus transportation is provided between Ronald Reagan National Airport (DCA) and the FBI Academy. Students are highly encouraged to use this bus service provided by TD. Using transportation other than the scheduled buses must be vouchered against the student's approved EAN for reimbursement, unless the student is considered "local" and not in a "travel status." Students should utilize Washington Dulles International Airport (IAD) or Baltimore-Washington International Airport (BWI) only in exigent circumstances or with prior authorization from TD.

4.4. External Training Event Execution

4.4.1. Submitting an Event Request

Students must submit a request to attend an external training event via the "External Training" section in [ERS](#). There are three ways to submit an external training request:

- Select a coordinated event from the event catalog. A coordinated event is an event for which an FBIHQ division is managing the attendance and funding (fully or partially), or an event that was preapproved by DOJ with limited participation.
 - DOJ-approved external training events are conferences for which the DOJ expects the Department as a whole (i.e., all DOJ entities combined) to exceed \$250,000. These conferences are sent out in a data call twice each fiscal year, one for quarters 1 and 2 and one for quarters 3 and 4. The data calls require the FBI to request preapproval for the number of attendees and the registration and travel costs for those attendees. Once the DOJ has approved the conference costs, the conferences are open for attendees to submit external training requests. In some cases, the DOJ may lower the amount the FBI requests, limiting capacity further. However, the number of attendees can fluctuate as long as the approved total costs are not exceeded. TD must assign FBIHQ program managers (PMs) to these events to confirm that each employee has a mission-critical need to attend, due to the limited availability.
- Select the event from the event catalog based on another requestor's event request. This means someone else in the FBI is also attending this event. Linking to the event allows the FBI to gather attendance at the same event for reporting purposes.

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- Create an original event request if it is not listed in the event catalog.

4.4.2. External Training Event Approvals

Regardless of the way in which the event request is entered, the approval process begins with the requestor's supervisor. The request then routes from the supervisor to the FBIHQ division/FO TC. Upon approval, the TC must route the request to the appropriate FM to set the funding strip if an EAN is needed for travel.

If the event is a coordinated event, the FBIHQ PM for the event must review and approve or deny the event in ERS.

A specialty program (defined in [Appendix E](#)) can be selected for any external training event with the exception of a coordinated event. After the TC selects the specialty program, the request is routed to the PM and FM to create the EAN.

4.4.2.1. Department of Justice Approval Guidelines

The following external training events require DOJ approval and must be submitted to TD no less than 60 days prior to the start date of the event:

- Events that are occurring overseas. The requestor must complete a justification form ([DOJ PS 1400.01, Planning, Approving, Attending, and Reporting Conferences](#), Attachment 3, "Attendance at Conferences Held Outside the United States"), to be provided to FD and DOJ.
- Events in which the cost to DOJ will exceed \$250,000.

4.4.3. Student Transcripts and Payment

Once approved, students must register for the event in coordination with their finance offices.

Student transcripts are automatically updated once the student has confirmed training attendance. The student must confirm attendance via the ERS external training request and enter in the actual registration costs associated with attending the event.

If course attendance has not been confirmed, invoices will not be paid, nor will course credit be established on the employee transcript.

Payments may be made through invoices, government purchase cards (GPCs), reservation of funds/obligations (RIO) documents, reimbursable agreement obligation (RAO) documents, requisitions, or reimbursements to employees.

External training events must be reported quarterly to DOJ (see [subsection 4.2.5.2](#)).

4.4.4. Continuing Service Agreement

When an employee attends an external training event, the FBI may require him or her to sign a Continuing Service Agreement (CSA). A CSA is a written agreement between the employee selected for training and the FBI. In the agreement, the employee agrees to (1) continue in the service of the FBI after the end of the training period for at least three times the length of the training, and (2) pay to the government incurred training expenses if the employee is voluntarily separated before the period of service ends. An employee must enter into a CSA in writing before the training begins, in accordance with 5 U.S.C. § 4108(a) (Employee Agreements; Service After Training) and 5 CFR § 410.309(b) (Agreements to Continue in Service).

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4.4.5. Out-of-Pocket Payments

If a participant pays out of pocket for an approved external training event, he or she must complete form FD-794, "Payment Request"; attach it to the approved SF-182, Authorization Agreement, and Certification of Training. and the payment receipt; and provide the packet to the FM for reimbursement.

4.4.6. Vendor Prepayment

The U.S. government (USG) typically pays in arrears. However, the FBI may authorize advance payment of expenses for an event as long as there is a mechanism to protect the government's interest, such as reimbursement if the event is not completed or passed, per 31 U.S.C. § 3324 [1997], Advances, and 5 U.S.C. § 4109 [a][2], Expenses of training.

To authorize an advance payment of expenses for an event requested on behalf of an FO requestor, contact the regional contracting officer (CO).

To authorize an advance payment of expenses for an event requested on behalf of an FBIHQ division or an FO, contact the Commercial Payments and Confidential Services Unit (CPCSU), FD for guidance.

If an advance is made to the employee and the event does not occur, the employee is responsible for repaying the government for the advance.

If the advance payment is made to a vendor and the event is cancelled, it is the responsibility of the FBIHQ division/FO to work with the vendor and CPCSU to ensure that the funds are recouped by the government.

Advance payment for obtaining event services via a GPC, regardless of the amount, is prohibited per the Government Purchase Card Program Policy Guide, 0943PG, subsection 4.6.4., "Purchases Requiring Advance Payments."

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5. Authorities

- FTR, 41 CFR Chapters 300-304
- DOI PS 1400.01, *Planning, Approving, Attending, and Reporting Conferences* (March 2018)
- DOJ Appropriations Act, 2008 (Title II, Div. B, P.L. 110-161)
- OMB Circular A-123, *Management's Responsibility for Enterprise Risk Management and Internal Control*
- 5 U.S.C. § 4103
- 5 U.S.C. § 4101-4121, or Chapter 41
- 5 U.S.C. § 5703 provides an exception to 31 U.S.C. § 1345
- 5 U.S.C. 4108(a)
- 5 U.S.C. § 4109[a][2][1997]
- 5 U.S.C. § 5903
- 31 U.S.C. § 1345
- 42 U.S.C. § 3771 details another exception to 31 U.S.C. § 1345
- Executive Order (EO) 11348, *Providing for the Further Training of Government Employees*, as amended by EO 12107 (1978)
- 5 CFR Part 410
- 41 CFR Chapters 300–304
- The Violence Against Women and Department of Justice Reauthorization Act of 2005, as amended by Public Law (PL) 109-2

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Appendix A: References

- [TD BUNET site](#)
- [PD 0925D, Counterintelligence Official Reception and Representation Expenses \(CORRE\) and Representation Funds](#)
- [Virtual Academy Policy Directive and Policy Guide, 0747DPG](#)
- [Government Vehicle Use Policy Guide, 0947PG, subsection 4.5., "Passengers"](#)
- [PD 0898D, Purchasing Approval Authority for Requisitions \(FD-369\)](#)
- U.S. DOJ Transportation Security Administration Pre-Check Program Guide, December 2012
- [OMB Circular A-123 Charge Card Management Plan, January 2017](#)

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Appendix B: Approval Authorities

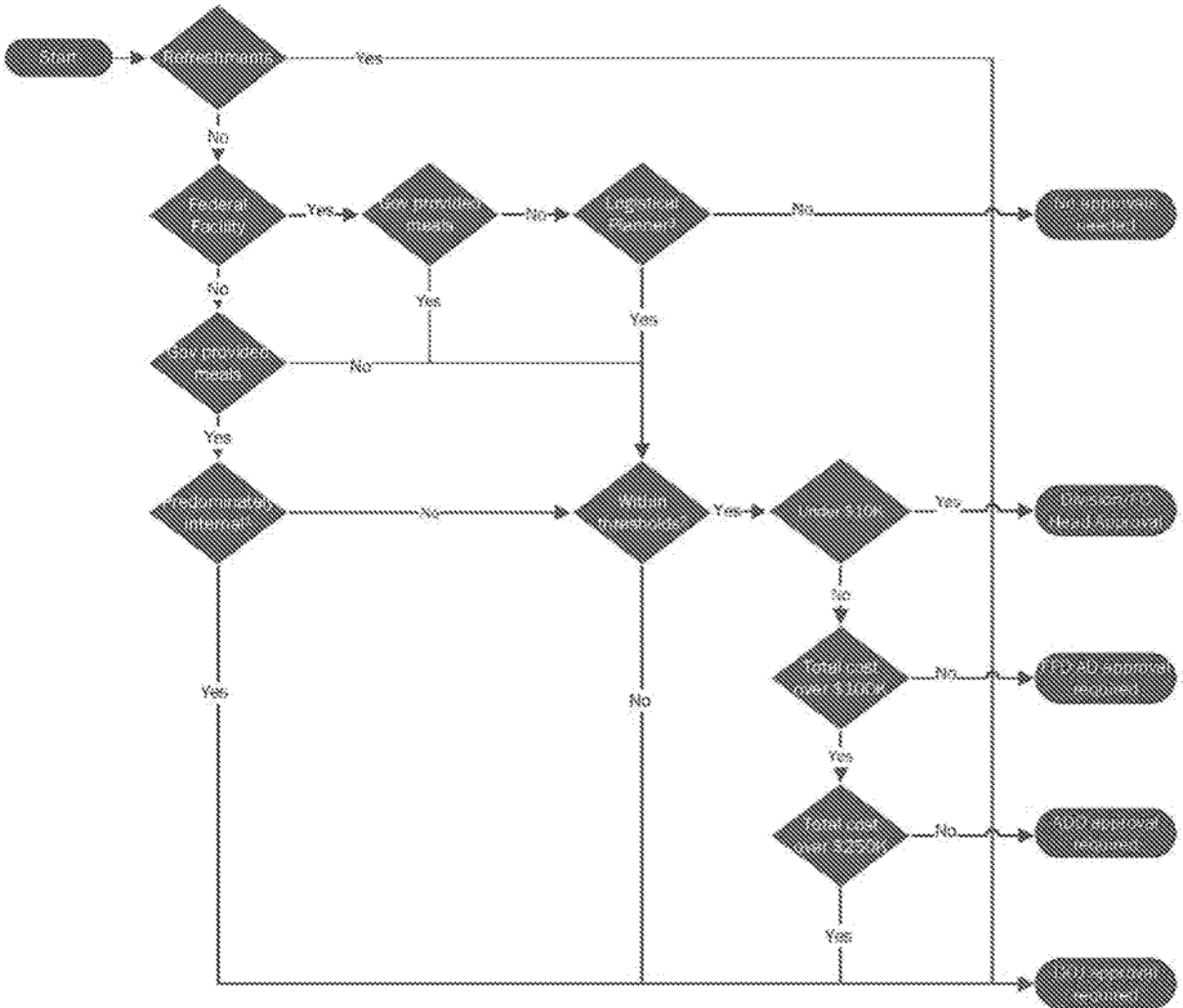
Per the DOJ memorandum dated November 8, 2017, “Blanket Approval for Certain Predominately Internal Conferences at Non-Federal Facilities,” the AAG/A has granted blanket approval for predominately internal conferences at nonfederal facilities up to the conference limits below, subject to the following requirements:

- Refreshments must not be provided.
- Meals must not be provided by the government.
- Guest speaker fees must not exceed \$3500 (excluding travel).
- Conference space and A/V costs must not exceed \$25 per person per day, or \$20,000 total.
- Programmatic conference planners must not exceed \$200 per person, or \$35,000 total.
- Logistical conference planners must not exceed \$50 per person, or \$8750 total.

Authority to Approve Conference Expenditures			
Component CFO/Exec Officer	Component Head or Principal Deputy	AAG/A	DAG
Up to \$100,000	\$100,001 to \$250,000	\$250,001 to \$500,000	Over \$500,000

All conference and training requests must still be entered into ERS for processing.

Appendix C: FBI-Sponsored Conference Approval Decision Chart



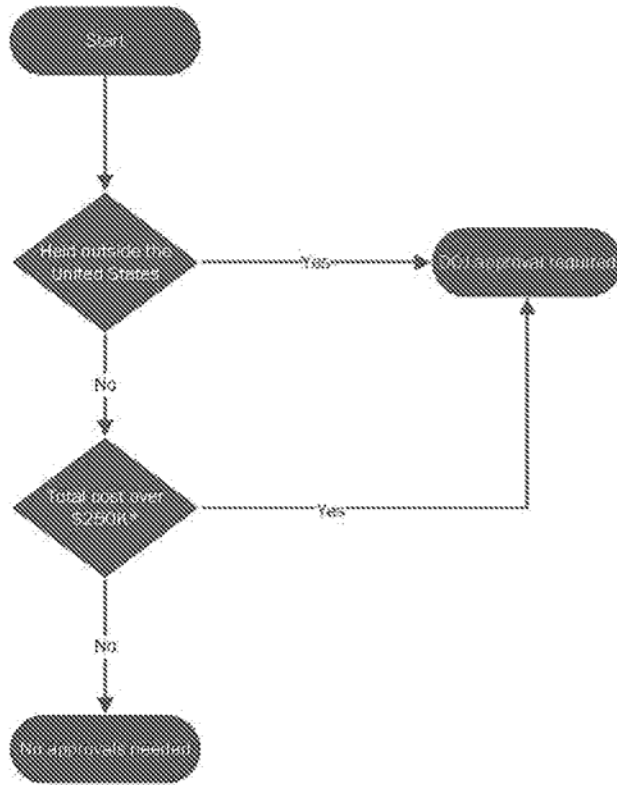
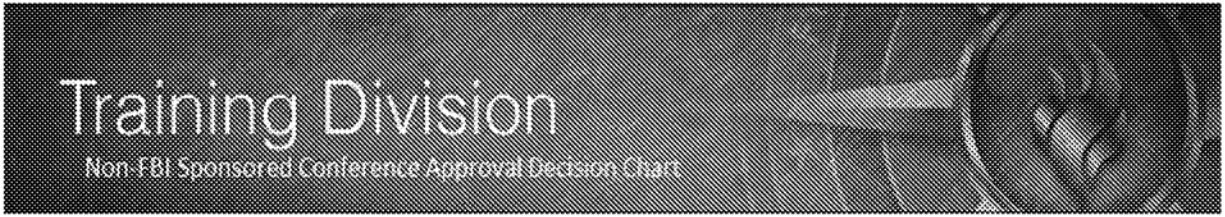
1. A predominately internal conference is a Department-sponsored conference where a majority (more than 50%) of the attendees are DOJ employees.

2. Below are the most common thresholds established in DOJ PS 1400.01:

- * The cost threshold for meeting space and AV equipment and services is limited to \$25 per day per attendee, not to exceed a cumulative cost total of \$20K.
- * The cost of any meal provided, plus any service costs and tax, cannot exceed 150% of the locality M&IE rate per meal.

3. Logistical conference planners perform the logistical planning necessary to hold a conference, which may include recommending venues, advertising, setting the stage and AV equipment, securing hotel rooms, interacting with caterers, and other non-programmatic functions.

Appendix D: Non-FBI-Sponsored Conference Approval Decision Chart



*DO1 conducts data calls twice a year for projected attendance at conferences expected to cost the Department more than \$250K.

Appendix E: Definitions and Acronyms

Definitions

Conference: defined in the FTR in part as a meeting, retreat, seminar, symposium or training activity (41 CFR § 300-3.1). A conference is typically a prearranged event with designated participants and/or registration, a published substantive agenda, and scheduled speakers or discussion panels on a particular topic.

Course: an FBI-sponsored event in the VA course catalog that has an established curriculum and has been vetted through TD's Registrar's Office.

Event: a preplanned activity such as a meeting, a retreat, a seminar, a symposium, a training, or a conference.

Event authorization number: a number issued for travel reimbursement. By way of background, EANs replaced TR numbers.

External training: non-FBI-sponsored conferences and training events. This was previously referred to as "GETA" (Government Employees Training Act) and typically includes events where the FBI is only paying for the registration fees and/or travel of the attendees.

FBI-sponsored event: any meeting, retreat, seminar, symposium, training, or conference planned and conducted by the FBI, or an event planned and conducted by an outside entity through the use of a contract or a cooperative agreement entered into by the FBI. An event is considered FBI-sponsored if the FBI provides more funding than any other involved agency or entity or if the FBI received some or all of the funding for the event from another agency through a reimbursable agreement.

Federal facility: a property owned, leased, or substantially controlled by the federal government or the government of the District of Columbia (DC).

Market survey/research: a cost comparison of multiple facilities in multiple cities.

Specialty program – external training: a training program that has funding specifically set aside for a population of employees to utilize for their specialty. These funds are managed by the program manager of that program, which is located in the appropriate FBIHQ division.

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Acronyms

AAG/A	assistant attorney general for administration
AD	assistant director
ADD	associate deputy director
ADIC	assistant director in charge
AU	Audit Unit
A/V	audio/visual
BWI	Baltimore-Washington International Airport
CC	class coordinator
CFR	Code of Federal Regulations
CORRE	counterintelligence official reception and representation expenses
CPCSU	Commercial Payments and Confidential Services Unit
CSA	Continuing Service Agreement
DC	District of Columbia
DCA	Ronald Reagan National Airport
DDAEO	deputy designated agency ethics official
DOJ	Department of Justice
e-mail	electronic mail
EAN	event authorization number
EEO	equal employment opportunity
EO	executive order
EPAS	Enterprise Process Automation System
ERS	Event Request System
FAR	Federal Acquisition Regulation

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FBI	Federal Bureau of Investigation
FBIHQ	Federal Bureau of Investigation Headquarters
FD	Finance Division
FLSD	Facilities and Logistics Services Division
FM	financial manager
FO	field office
FTR	Federal Travel Regulation
GETA	Government Employees Training Act
GPC	government purchase card
IAD	Washington Dulles International Airport
INSD	Inspection Division
IOD	International Operations Division
Legat	legal attaché
OGC	Office of the General Counsel
OIC	Office of Integrity and Compliance
OIG	Office of the Inspector General
OMB	Office of Management and Budget
OPM	Office of Personnel Management
PD	policy directive
PG	policy guide
PL	public law
PM	program manager
PO	purchase order
POC	point of contact
PS	policy statement

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PSU	Physical Security Unit
RAO	reimbursable agreement obligation
RIO	reservation of funds/obligations
SAC	special agent in charge
SecD	Security Division
SF	standard form
TC	training coordinator
TCSU	Training Coordination and Support Unit
TD	Training Division
TDDP	Training Development and Delivery Plan
TDY	temporary duty
TRIP	Travel Request Initiation and Payment
TRP	Threat Review and Prioritization
TU	Travel Unit
UC	unit chief
U.S.	United States
U.S.C.	United States Code
VA	Virtual Academy
ZBRA	Zero Based Resource Allocation