

GENERAL SERVICES ADMINISTRATION
Washington, DC 20405

OAS 5785.1C
October 1, 2020

GSA ORDER

SUBJECT: Conference and Event Management

1. Purpose. This directive provides guidance on sponsoring or co-sponsoring conferences, internal management meetings, and award ceremonies with cost; and attending or participating in any of these events.
2. Scope and Applicability. This Order provides standards, instructions, and procedures governing the management of and participation in events. The provisions apply to all GSA employees except for employees of the Office of Inspector General (OIG), given its independence under the Inspector General Act, as amended (5 U.S.C. App. 3). This directive applies to the Civilian Board of Contract Appeals (CBCA) only to the extent that the CBCA determines it is consistent with its independent authority under the Contract Disputes Act and applicable Federal Court decisions and does not conflict with other CBCA policies or its mission.
3. Cancellation. This directive cancels and supersedes OAS 5785.1B, Conference and Event Management.
4. Responsibilities.
 - a. Administrator. Approves all proposed conferences with estimated costs over \$500,000.
 - b. Deputy Administrator.
 - (1) Approves all proposed conferences with estimated costs over \$100,000 through \$500,000; and
 - (2) Approves all internal management meetings with estimated costs over \$100,000.
 - c. Office of Administrative Services (OAS).
 - (1) Provides oversight of the event and attendance approval process and related policy;

(2) Performs all contract actions for conference space, related activities, and amenities with estimated costs above the micro-purchase threshold for GSA events (i.e., conferences, internal management meetings, or award ceremonies);

(3) Provides agency guidance for fiscal year event planning annually;

(4) Reviews and approves all proposed conferences for relevance to GSA's mission and provides final approval for all conferences with anticipated costs of \$100,000 and under;

(5) Reviews and approves proposed award ceremonies with costs over \$100;

(6) Approves all internal management meetings with anticipated costs between \$10,000 and \$100,000;

(7) Provides the OIG with a report on GSA-sponsored conferences that cost over \$20,000 within 15 calendar days after the conference; and

(8) Provides the OIG and Office of Strategic Communication (OSC) with an annual report of all GSA-sponsored conferences during the previous fiscal year that cost over \$100,000 by January 31 of each year.

d. Office of Travel and Charge Card Services, OAS.

(1) Develops and provides conference and event management guidance to GSA employees;

(2) Serves as the application owner for Event Tracker;

(3) Provides training on Event Tracker; and

(4) Monitors requests in Event Tracker for compliance with GSA policy.

e. Office of GSA IT.

(1) Provides help desk service for Event Tracker; and

(2) Implements Event Tracker system changes.

f. Office of General Counsel (OGC).

(1) Reviews and approves contractual or other agreements as part of the event request process, as required; and

(2) Reviews and approves attendee requests that include offers of gifts and

travel-related payments from a non-Federal source for legal sufficiency.

g. Office of Strategic Communication (OSC).

(1) Posts the annual report of all GSA-sponsored conferences during the previous fiscal year over \$100,000 provided by OAS on GSA's public website by January 31 of each year; and

(2) Reviews attendee requests and approves talking points, presentations, etc., for employees that are speaking or presenting at a conference in an official capacity.

h. Heads of Services and Staff Offices (HSSOs).

(1) Submit annual conference and event management plans to OAS, as directed in the annual event management plan submission guidance for review and approval by the Chief Administrative Services Officer (CASO) and Deputy Administrator;

(2) Ensure funds are not obligated by any means (e.g., contract, purchase order, purchase card) to support an event prior to approval from OAS, Deputy Administrator, and/or Administrator, as appropriate;

(3) Ensure that no publicity concerning GSA's involvement in a conference, including serving as a speaker or panelist, occurs prior to appropriate approvals;

(4) Ensure all event and attendee requests are properly submitted in Event Tracker and review all requests for approval (HSSOs may delegate authority to review and/or approve certain event and domestic attendee requests in Event Tracker to their deputy or chief of staff.);

(5) Ensure that approved GSA-sponsored or co-sponsored conferences, internal management meetings, and award ceremonies are planned and conducted in accordance with GSA's policies and mission;

(6) Ensure that conference and award ceremony expenditures comply with applicable regulations and policies;

(7) Ensure that costs for conferences and award ceremonies are minimized and represent the best value obtained by the Government, and that attendee travel expenses stay within per diem rates under the applicable per diem reimbursement method, unless otherwise properly approved;

(8) Designate a central point of contact for their respective organization responsible for monitoring the conference and attendance approval process and serving as the key contact responsible for ensuring that information and required documentation is entered into Event Tracker; and

(9) Ensure that GSA staff in their organization responsible for planning events are familiar with the tools identified in this guidance and are familiar with and adhere to the guidance in [FTR §301-74](#), [Appendix E to Chapter 301](#) of the FTR, and herein.

5. Explanation of Changes.

a. Paragraph 10 is revised to clarify OAS responsibility for executing contract actions for all GSA events in excess of the micro-purchase threshold.

b. Paragraph 12a is revised to add policy regarding the HSSO's ability to delegate their authority to approve certain event requests to designated personnel and the requirement for HSSOs to personally approve all requests for conferences with estimated costs exceeding \$100,000.

c. Paragraph 12b is revised to add policy regarding the requirement for HSSOs to personally approve all requests for internal management meetings with estimated costs exceeding \$100,000.

d. Paragraph 12c is revised to add requirements to submit event requests no later than 45 days prior to the event start date, to submit a memorandum of understanding with event requests for co-sponsored conferences, and rescind events requests and submit new requests when estimated costs increase by more than 20 percent prior to the start of the event; and to add policy that event requests are not required when offices conduct virtual events.

e. Paragraph 13a is revised to add policy on the HSSO's ability to delegate their authority to approve certain attendee requests and to change the policy to require employees to submit attendee requests no later than 30 days prior to the event start date.

f. Paragraph 13c is added to provide policy regarding the requirement to submit attendee requests for virtual events only when the employee is speaking or presenting at a non-GSA sponsored conference or related event.

g. Paragraph 17b. is revised to clarify requirements for annual reporting to OSC.

h. Appendix A: Definition of Terms has been changed to Appendix A: Glossary of Terms.

i. Appendix A: Glossary of Terms is revised to add the definition of virtual conference.

j. Appendix C: Event Tracker Application Requests has been changed to Appendix C: Event Tracker Request Guidelines.

k. Appendix C: Event Tracker Request Guidelines is revised to add guidance regarding virtual events and attendance.

6. Signature.

/S/ _____
BOB STAFFORD
Chief Administrative Services Officer
Office of Administrative Services

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CONFERENCE AND EVENT MANAGEMENT

1. Policy.

a. Award ceremonies with costs over \$100, conferences sponsored or co-sponsored by GSA, conference attendance, and internal management meetings with expenses above \$10,000 require prior review and approval as described in this policy. Acceptance of non-Federal source travel requires approvals in accordance with [GSA Order OAS P 5765.1, GSA Non-Federal Source \(NFS\) Travel Policy](#). All cost estimates for event submission and approval thresholds must include estimated travels costs.

b. Periodic gatherings are a vital means of communication within GSA. The cost of conducting such gatherings should be minimized and attendance limited to those necessary to accomplish the purpose of the event. HSSOs must first consider less expensive methods, such as teleconference or virtual meetings. If virtual events will effectively deal with the subject matter, HSSOs will use that method.

2. Site Selection.

a. When there is a broad range of subjects requiring extensive group interaction over a period of days, the most effective approach may be to meet in one location. Planners will not exclude any geographical location or facility from potential consideration; however, the location chosen should be one that minimizes total costs. GSA event planners must first consider free or low-cost venues, such as conference spaces in Federal facilities. [FTR §§301-74.2](#) through [301-74.5](#) will be considered when recommending a site to the respective HSSOs. Event planners will also refer to the Federal Acquisition Regulation (FAR) §13.106-3(a), §13.203, §15.404-1, and §8.405-2(d), in determining whether prices are fair and reasonable.

b. Every effort should be made to hold such events within commuting distance of most of the attendees. Additional factors such as convenience to the organization, removal from workplace distractions, administrative fees, availability of facilities (space, equipment, and supplies), speaker fees, employees' time spent at the event, and traveling to and from the event should be considered.

c. When determining conference or other event dates, event planners should be aware that all hotels and meeting facilities have peak periods of high demand, "value" periods of low demand, and "shoulder" periods of variable demand. They must consider meeting around, rather than during, a site's peak season, if possible, in order to obtain a lower available rate.

d. GSA-sponsored events must be held in establishments that are FEMA-approved or identified as compliant with the safety requirements of the Hotel and Motel Fire Safety Act of 1990. No arrangements or contracts may be entered into with lodging or other facilities that are not compliant.

e. For events with estimated costs at or less than the Simplified Acquisition Threshold (see FAR §2.101), the planner must review at least three different potential sites based on the stated evaluation criteria for the event. For events estimated to cost more than the Simplified Acquisition Threshold, FAR requirements for full and open competition must be followed. In accordance with [FTR §301-74.14](#), event planners must also consider at least three sites and maintain a record of the cost of each alternative site considered for all GSA sponsored or co-sponsored conferences or internal management meetings with 30 or more attendees.

3. Per Diem.

a. GSA events will be held at sites that are within the locality's standard per diem rate. Any lodging above per diem requires an "actual expense" authorization. A request to conduct an event in a location requiring actual lodging expenses must be approved by OAS based on sufficient justification provided by the HSSO or designee. Refer to Chapter 4, Paragraph 5 of [OAS 5700.1 CHGE 1, Temporary Duty Travel Policy](#), for additional guidance on actual lodging expenses

b. An employee on temporary duty is responsible for paying for their lodging and meals, and submitting vouchers for reimbursement. Appropriate reductions in per diem must be made for any event in which lodging and/or meals are provided to those in temporary duty travel status. Pursuant to law, meals may not be provided to employees at their official duty stations except as part of a course of training which meets the requirements of appropriations law (see Paragraph 6.b. below).

4. Use of Third Party Event Planners. Third party event planners are to be used only in rare circumstances for GSA-sponsored conferences. Third party event planners will not be used for internal activities or internal management meetings. Any expense related to a third party event planner will be included in the proposed plan and Event Tracker request for the event, to include indirect costs through a no-cost contract. Services of third party event planners may be used only after approval by the HSSO (or designee) and OAS.

5. Entertainment, Extraneous Items, and Activities. GSA sponsored events shall not include entertainment or other extraneous and unnecessary items and activities, for example purchase or rental of costumes or clothing. These items are generally illegal to purchase with Government funds. Planners should exercise sound judgment and prudence regarding necessary expenses to carry out GSA's mission, as well as consider public perception on the use of taxpayer dollars.

6. Use of Government Funds. Events must be approved by the HSSO (or designee) and OAS, as described in this Order, before any procurement activity takes place, any obligations are made by the agency, or any costs are incurred by GSA. In addition to minimizing costs, the organization conducting the event must also observe limitations

on Government funds for allowable items used such as promotional or memento items, meals and refreshments, and training materials.

a. Promotional or Memento Items. Items such as buttons, coins, coffee mugs, T-shirts or other items of clothing, briefcases, stickers, water bottles, or toys must not be paid for using Government funds. Typically, items or tokens given to individuals are considered gifts and are not essential to the GSA mission. Promotional or memento items may be provided to employees only as non-monetary awards given to recognize superior achievements or accomplishments in accordance with applicable awards criteria. The issuance of mementos to all attendees at a conference as keepsakes, souvenirs, or informal appreciation is not permissible. Refer to [GSA Order, OGC 5090.1A Purchase of Promotional or Memento Items](#), for additional guidance on the purchase of such items.

b. Food.

(1) The furnishing of beverages and similar refreshments are considered in the nature of entertainment and are not payable from appropriated funds in the absence of specific statutory authority. This rule also applies to free meals provided to Government employees at their official duty stations. One exception to this rule is the purchase of food and beverages incident to the conduct of training. For this exception to apply, the training must meet the definition in 5 U.S.C. §4101(4). In addition, justification must be made that the interchange during the serving of meals or "coffee breaks" is an important and necessary element of the design of the training, and that the discontinuity that would otherwise occur would be detrimental to the goals of the training. The funds, however, may not be used to provide these amenities to non-Government employees unless they are speakers or other active participants whose expenses can be considered a part of the cost of providing training.

(2) Light refreshments, including beverages and snacks, may be provided in connection with an awards ceremony that meets the requirements of the Government Employee Incentive Awards Act and other applicable award criteria. Refer to [OGC 5090.1A](#) regarding the purchase of light refreshments for award ceremonies and refer to [Office of General Counsel \(OGC\) Memorandum dated July 22, 2005, Use of Agency Funds for Meals and Refreshments](#), for exceptions under which Government funds may be used to purchase food.

c. Training Materials. The Government Employees Training Act (5 U.S.C. 4101-4119) authorizes the funding of such items as pens, pads, and notebooks at training which qualifies as such under the Act. Reference to meetings and other events as "training" in event requests is not sufficient justification to purchase these items. Any purchase of such items may only be completed in accordance with all applicable GSA Orders and guidance.

7. Award Ceremonies. Award ceremonies may be held as part of a conference or as a separate event. Awards may be monetary or non-monetary, must be given in

recognition of a significant achievement by an employee or group of employees and must comply with [HRM 9451.2 GSA Associate \(Employee\) Performance Recognition System \(APRS\)](#) and [OGC 5090.1A](#). Under no circumstances should events be improperly designated as award ceremonies to justify the purchase of food.

8. Receipt of Gifts. GSA employees must comply with the provisions of Subpart B of [5 C.F.R. Part 2635, Gifts from Outside Sources](#), of the Standards of Ethical Conduct for Employees of the Executive Branch, [OAS 7880.1B Acceptance of Gifts and Decorations from Foreign Governments and the Giving of Gifts to Foreign Individuals by GSA Employees](#), and other applicable law. Employees may not solicit or accept gifts from a prohibited source or a gift given because of their official position. In addition, employees may not use their position to induce or influence another person to provide any benefit, financial or otherwise, to themselves, their friends or their relatives. GSA event planners or designated representatives shall not retain promotional materials such as complimentary rooms or free meals associated with conference planning for personal use ([FTR §§301-53.3\(b\)](#); [301-74.1\(d\)](#)). To the maximum extent possible, promotional materials must be used to defray costs of conducting the event. Consult with OGC for further guidance.

9. Printed Materials. Information should be provided in electronic format whenever practicable and permitted by law. The printing and publication of paper documents will be limited and must be consistent with GSA's mission, objectives, and existing policies. The printing and production of such materials must represent efficient and effective use of taxpayer funds and not create barriers for the public in obtaining GSA information.

10. Acquisition of Event-Related Services. The Office of Internal Acquisitions (OIA), OAS, is responsible for overseeing and performing all contract actions for event space, related activities, and amenities for GSA events (i.e., conferences, IMMs, or award ceremonies) with estimated costs above the micro-purchase threshold. A GSA purchase cardholder in the requesting office may use their GSA purchase card for any actions at or under the micro-purchase threshold once the event request is approved. In accordance with [OAS 4200.1B CHGE1 Management and Use of the GSA SmartPay® Purchase Card](#), purchase cardholders and warranted contracting officers are strictly prohibited from splitting purchases to circumvent their purchase card limits and/or the micro-purchase threshold. Officials who are planning an event will consult with the assigned OAS contracting officer regarding specific requirements under the FAR and the General Services Administration Acquisition Manual.

11. Annual Event Management Plans. HSSOs will submit annual event management plans in accordance with guidance provided by OAS. OAS will provide annual guidance for the submission of plans for the next fiscal year in a time frame that allows for proper planning and identification of planned events. HSSOs will not include conference attendance in their event plan submissions.

12. Authorization and Approval of Events.

a. Conferences Sponsored or Co-sponsored by GSA. Conferences to be sponsored or co-sponsored with the primary purpose of expanding or advancing the services of GSA, GSA customers, or client-related or project-related functions may be authorized after an event request with business justification and cost estimate are approved by the HSSO and OAS in Event Tracker, GSA's conference attendance and event management application. HSSOs can delegate approval of event requests with an estimated cost of \$100,000 or less to their deputy or chief of staff. Conferences with a cost exceeding \$100,000 must be reviewed and approved by the actual HSSO; this approval authority cannot be delegated further. Any conference with a cost exceeding \$100,000 must be further approved by the Deputy Administrator and any conference with a cost exceeding \$500,000 must be approved by the Administrator. No obligation of funds, memoranda of understanding or publicity may occur prior to securing appropriate approvals.

b. Internal Management Meetings. Internal management meetings with an estimated cost of \$10,000 and under may be authorized by the HSSO or appropriate designee. Internal management meetings that exceed \$10,000 in estimated cost must obtain prior approval of the HSSO (or designee) and OAS in Event Tracker. Internal management meetings that exceed \$100,000 must be further approved by the Deputy Administrator. Internal management meetings with a cost exceeding \$100,000 must be reviewed and approved by the HSSO; this approval cannot be delegated further. No obligations of funds or publicity may occur prior to securing appropriate approvals.

c. Submission Requirements for Event Requests.

(1) Event requests must be reviewed by the HSSO or designee and submitted at least 45 calendar days before the beginning of the event. Requests submitted after the required timeline must include a justification as to the reason for the late submission; however, such requests may be denied due to insufficient time to properly review the request. If the event involves any contractual or other agreements with non-GSA entities, such agreements must be reviewed and approved by OGC as part of the approval process.

(2) Event requests for both GSA-sponsored conferences and internal management meetings also must include an agenda. The use of an outside speaker, paid or otherwise, must be reflected in the proposed agenda. If the event includes a paid speaker from outside the agency, the expense must be included and entered in the event request. Event requests for internal management meetings must include a list of expected attendees, to include estimates of their individual travel expenses. Event requests for co-sponsored conferences must include a copy of the memorandum of understanding or similar document which includes the responsibilities of all parties.

(3) Events with increases of more than 20 percent (rounded up) of the planned costs prior to the start date of the event must be rescinded in Event Tracker, and a new event request with updated costs must be submitted for approval by OAS, the Deputy Administrator, and/or the Administrator, as applicable.

(4) Event requests will not be submitted for virtual events held/sponsored or co-sponsored by GSA.

13. Conference Attendance.

a. General.

(1) Attendance at a conference, whether hosted by GSA or another entity, must be limited to the minimum number of individuals and the amount of time needed to carry out any required activity. An employee who wishes to attend or speak at a conference in an employee's official capacity must submit an attendee request in Event Tracker and obtain prior approval of the HSSO prior to submission of a travel authorization in the E-Gov Travel Service (ETS), regardless of conference cost or travel requirement. (Note: To maximize use of the less expensive, limited capacity city pair fares, employees are encouraged to make reservations in the ETS upon submission of their attendee request but they cannot submit the authorization for approval until the attendee request is approved. The employee must cancel the reservation in the ETS if the attendee request is not approved.)

(2) HSSOs can delegate approval of domestic attendee requests to their deputy or chief of staff. The Federal Acquisition Service and Public Buildings Service Commissioners can further delegate approval authority for domestic attendee requests under \$2,500 in estimated cost to the respective regional or associate commissioner. HSSOs must approve all attendee requests involving international travel. HSSO attendance requires approval of the Deputy Administrator.

(3) Individual attendee requests are submitted through the Event Tracker application and must be submitted in the Event Tracker at least 30 calendar days before the beginning of the event. (See Appendix C.) Late submission of requests may result in an employee's inability to attend the event or accept the offer of a payment from a non-Federal source due to insufficient time to properly review the request.

(4) Individual employees must ensure that their attendee request and appropriate travel authorization are approved prior to departure. Additionally, employees must ensure that no publicity or other advertising regarding the employee's participation in the event is published before the Event Tracker attendee request has been approved. Registration or booth fees may only be paid after receiving all proper approvals.

(5) Employees must provide information regarding the event, including the conference venue and agenda, event web address, justification for attendance, and estimated travel costs in the event record and attendee request. The request justification must be clear, address the individual employee's role at the event and state how the employee's participation supports GSA's mission, operation, or programs.

b. Speaking/Presenting at a Conference.

(1) Employees are required to indicate in the attendee request if they will be speaking or presenting at a conference and/or if the event is open to the press or media-sponsored by selecting the appropriate fields in the request.

(2) Employees must also provide a copy of the invitation or offer to speak at the event, and attach speaking notes, the presentation, or an outline of their presentation in the "Notes and Attachments" section of the attendee request. Speakers will also ensure that event sponsors do not advertise or publicize GSA participation at the event until after the Event Tracker attendee request is approved.

(3) If an employee has been approved to attend a conference and subsequently is invited to speak, the request must be updated to indicate the employee is speaking, the required documentation must be attached to the request (see b.(2) above), and then the request must be resubmitted for proper routing and approval.

c. Virtual Attendance. Generally, employees will not submit attendee requests in Event Tracker for approval when participating in/attending virtual conferences or similar events. GSA employees will only submit attendee requests when speaking or presenting at virtual conferences not sponsored by GSA and/or requesting acceptance of an offer from a non-Federal source.

14. Non-Federal Source Payments.

a. Payment for travel expenses to a meeting or similar function, including a conference, that an employee is attending in their official capacity, from a non-Federal source is considered a gift to GSA and not to the employees. Policy for accepting these payments in-kind is contained in [OAS 5765.1](#)

b. Attendee requests that include a request to accept a gift related to attending a local event or a travel-related payment from a non-Federal source must be reviewed and approved, in advance and prior to departure and attendance, by OAS and OGC. Employees must indicate non-Federal funding in Event Tracker attendee requests if any gift will be received or if any portion of the employee's travel expenses is being offered to be paid for, waived, or discounted by a non-Federal entity. This includes, but is not limited to transportation, lodging, meals, or registration fees. OGC reviews and approves attendee requests that include offers for gifts and non-Federal source travel payments for legal sufficiency. Attendee requests must be submitted as prescribed in Paragraph 13.a.(2) above in order to allow time for proper review of the gift by OGC or the requesting office may be required to pay the expense.

c. Attendee requests that include a request to accept a gift related to attending a local event or a travel-related payment from a non-Federal source must include documentation of the offer, including the invitation to the event, emails or other record from the non-Federal source that provide an itemized list of costs, and a statement that the items will be provided in-kind. Requests in which the employee will be on official

travel to attend the event must also include a completed [Request for Acceptance of Payment from Non-Federal Sources Worksheet](#). A [Local Events Worksheet](#) must be attached with an attendee request for local events that include a request to accept a gift from a non-Federal source. All appropriate documentation must be attached under the “Notes and Attachments” section of the request at the time of submission.

15. Retention of Documents. All conference planning and cost documentation, including both pre-conference cost estimates and actual conference costs incurred, must be retained for six years after final payment for all contracts in accordance with the National Archives and Records Administration's (NARA's) [General Records Schedule 1.1, Financial Management and Reporting Records](#). These documents may be inspected by OGC, the OIG, the Office of Management and Budget, the Government Accountability Office, and other interested parties including the public, as appropriate under law.

16. Post-Conference Reporting. Each organization conducting a GSA sponsored or co-sponsored conference exceeding \$20,000 will provide actual attendance and expense costs in the Event Tracker event record within 60 calendar days after the end of the event. Each organization conducting a GSA sponsored or co-sponsored conference exceeding \$100,000 will also prepare a narrative and actual expense report and attach it to the Event Tracker event record within 60 calendar days after the end of the event.

a. The narrative will:

(1) Provide an overview of the number of attendees and composition of attendees (e.g., GSA employees, other Government attendees, industry, contractors);

(2) Report the outcomes and indicate whether GSA's mission and objectives were achieved (include conference highlights);

(3) State what follow-up activities or actions are required;

(4) Summarize the results of any surveys conducted; and

(5) Provide any other information required by the HSSO.

b. The expense report will include both estimated and actual expenses incurred.

c. Per OMB Memo [M-12-12](#), as amended by OMB Memo [M-17-08](#), conferences over \$100,000 also require a report publicly posted on GSA's website that describes:

(1) Total conference expenses incurred by the agency for the conference;

(2) Location of the conference;

(3) Date of the conference;

(4) A brief explanation how the conference advanced the mission of the agency;

(5) The total number of individuals whose travel expenses or other conference expenses were paid by the agency; and

(6) A copy of the Administrator's rationale for approval for conferences that exceed the \$500,000 threshold.

17. Notification to OIG and OSC.

a. When the actual cost to the Government of a GSA sponsored or co-sponsored conference exceeds \$20,000, OAS must notify the OIG of the date, location and number of employees attending the conference within 15 calendar days of the ending date of the conference.

b. OAS will provide OIG an annual report of all GSA sponsored conferences conducted with costs to the Government that exceed \$100,000. OAS will provide a copy of the report to OSC for public posting. The report will meet the requirements prescribed in paragraph 16.c. above. It will also include a summary of total net conference expenses for the previous fiscal year and a general report about conference activities throughout the year. Hosting organizations must ensure that all post-conference narratives and actual costs required in paragraph 16 are completed in the required timeframe to ensure timely reporting.

Appendix A. Glossary of Terms

Award – a monetary or non-monetary recognition of a significant achievement by an employee or group of employees presented in accordance with the GSA awards policy. See [HRM 9451.2 GSA Associate \(Employee\) Performance Recognition System \(APRS\)](#) for other applicable award criteria.

Conference – a symposium, seminar, workshop or other organized or formal gathering lasting portions of one or more days and typically involves attendee travel (local or TDY travel) and matters of topical interest. The term also applies to training activities that are considered to be conferences under [5 CFR §410.404](#). The term does not include technical or administrative site visits necessary to conduct operational business. Indicia of a conference include a published agenda, scheduled speakers, and/or discussion panels.

Conference Costs – all costs incurred by the Government for a conference, whether paid directly by agencies, reimbursed by agencies to travelers or others associated with the conference (e.g., speakers, contractors), or incurred indirectly (e.g. under a no-cost contract). Such costs include, but are not limited to, pre-conference planning activities, travel to and from the conference, ground transportation, lodging, meals and incidental costs, meeting room rental, audiovisual costs, registration fees, speaker fees, honoraria, and other conference-related administrative fees, and the cost of employees' time spent at the conference. Conference costs do not include funds paid under Federal grants to grantees. For purposes of this Order, the conference costs of a no-cost contract may be based on reasonable estimates.

Event Planner – GSA employee designated to oversee the conference, internal management meeting, or award ceremony. Unless specifically stated, the term does not include third party event planners.

Internal Management Meeting – an assembly of persons to discuss general matters internal to an agency or other topics that have little relevance outside the agency, as part of a course of doing business. The meeting may be held in Federal or non-Federal space and may involve attendee travel (i.e., local or TDY travel). An example would be a day-long quarterly supervisors meeting discussing business management topics, issues, or challenges of the agency.

Mission-Related Travel – travel to perform activities as part of GSA's day-to-day operations or management. See [5 USC §4110](#). Examples include:

- Conducting inspections, audits, and investigations;
- Overseeing the management of real and personal property;
- Attending operational exercises and deployment activities;
- Attending working group meetings addressing an operational issue;

- Attending customer, managerial or oversight meetings, planning and performance discussions, or hearings and governance sessions;
- Attending interagency or intergovernmental events coordinating policies or operations mutual to the programs or missions of the agency;
- Representing the agency as part of diplomatic relations;
- Attending informational meetings on internal agency communications on procurement and grant opportunities; and
- Attending ceremonies (e.g., ground breaking or ribbon-cutting ceremonies) or recruiting events.

Prohibited Source - as defined in [5 CFR §2635.203\(d\)](#) of the Standards of Ethical Conduct for Employees of the Executive Branch, means any person who:

- Is seeking official action by the employee's agency;
- Does business or seeks to do business with the employee's agency;
- Conducts activities regulated by the employee's agency;
- Has interests that may be substantially affected by the performance or nonperformance of the employee's official duties; or
- Is an organization, a majority of whose members are described above.

Third Party Event Planner – any entity that provides services and/or assistance in determining an appropriate location to host an event, regardless of whether an entity charges a fee for the service.

Training –the process of providing for and making available to an employee, and placing or enrolling the employee in a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields which will improve individual or organizational performance and assist in achieving the agency's mission and performance goals ([5 USC §4101](#)). Examples include:

- Education or coursework provided by vendors, technical schools, or institutions of higher learning, which is related to and applicable in the employee's current role, the job-relevance of which is evaluated on a course-by-course basis;
- Internal on-the-job training details;
- Organizational retreats and team-building exercises; and
- Attendance for the purpose of education at a seminar or symposium.

Virtual Conference - conference occurring entirely online rather than in a physical location

Appendix B. Contracting for Hotel and Meal Accommodations

General

There is no express prohibition on Government contracting officers entering into a contractual arrangement with a commercial enterprise for rooms and/or meals for employees traveling on official business. However, the amounts contracted may not exceed the amounts available to an employee based on the regulatory limitations on per diem or actual expense rates. As a practical matter, a contractual arrangement should not be used unless there is an advantage to GSA by using this method (e.g., elimination of room tax, guarantee for a large block of rooms).

When making conference, training session, or meeting arrangements, the location chosen should be one which minimizes the associated travel costs associated with them. Every effort should be made to hold such events within commuting distance of a majority of the attendees. Factors to be considered shall include the total cost, overall logistical convenience, removal from workplace distractions, adequate facilities (space, equipment, and supplies), and public perception. Also, authorizing officials should consider the options, in holding conferences in areas with variable season lodging rates, especially during the off-season. The location selected should be justified by an analysis of costs and benefits to determine that the session will accomplish its purpose at reasonable cost to the Government, all factors considered.

[Comptroller General Decision B-195133 dated January 19, 1981](#), requires that a hotel properly itemize its billing so that a clear review can be made of all items being billed to the Government to determine if they are properly payable from appropriated funds. A lump sum billing for all services does not meet this requirement. However, an exception to the Comptroller General decision is the use of package contracts. The package contract provides for all subsistence items to be included in one quoted price, without an individual breakout for each room and meal. This exception applies in situations where hotels offer a competitively priced conference package but are unwilling or unable to provide an itemized billing.

Contracting Guidelines

The expense limitations in GSA travel policy apply to all lodgings, meals, and incidental expenses incurred while in travel status, including those listed as part of a contract for a conference, meeting or training session. This constraint applies whether these items have been "prepaid" as part of a registration fee charged by GSA to attend the program or will be included on the participant's travel voucher. These rules apply whether some or all of the participants are from other agencies.

Allowable amounts for lodging, meals, and incidental expenses are normally determined by the per diem rates under the lodgings-plus per diem reimbursement method ([FTR](#)

[Part 301-11](#)). Current per diem rates within CONUS may be found at www.gsa.gov/perdiem. It is critical to select the correct rate based on city, town, or county where and month when the activity will be held.

Package Contracts for Conference Arrangements

In situations where hotels offer a competitively priced conference package but are unwilling or unable to provide an itemized billing, event planners may negotiate a package contract where all subsistence items are included in one quoted price without an individual breakout for each room and meal. However, the hotel must provide a total cost for subsistence items, apart from the cost for meeting rooms, audio/video, and other charges. This approach will allow the contracting officer to determine that provided rates do not exceed the established per rates for the locality.

Note: OAS' OIA is responsible for overseeing and performing all contract actions for conference space and related activities for GSA events with estimated costs above the micro-purchase threshold, unless a waiver to this requirement is granted.

Conference Planning Resources

[Conference, Events, and Trade Show Planning Services](#). Commercial services may be necessary for event and trade show planning. [Professional Services Schedule \(00CORP\), SIN 541 4D](#) provides a list of vetted contractors for these services with the ability to provide expert help in advertising, marketing and related communication fields.

Appendix C. Event Tracker Request Guidelines

Event Requests

The respective office requesting the event must designate a coordinator/request originator for entering required information in the Event Tracker application. The coordinator/originator must submit pertinent data to enable management to review a request to conduct or host an event. Depending on the type of event, data elements on a request may include the following items:

- Name and type of the event (e.g., conference, internal management meeting, award ceremony);
- Sponsoring office and point of contact information;
- Proposed location and justification for the event;
- Tentative number of GSA employees participating in or attending the event;
- Start and end dates;
- All estimated expenses;
- Purpose or objective of event; and
- Estimated revenue and fees, if any.

Event requests will include all required supporting documentation (i.e., lists of expected attendees for internal management meetings, memorandum of understanding or agreement for co-sponsored events). Event requests will not be submitted for GSA sponsored or co-sponsored conferences that are conducted virtually.

Attendee Requests

The following attendee requests must be entered into Event Tracker:

- Attending or speaking at any conference,
- Attending award ceremonies external to GSA,
- Speaking at virtual events, and
- Attending or speaking at an event where a non-Federal source has agreed to pay for all or part of the attendee's travel expenses or reduce or waive a registration fee.

The following attendee requests DO NOT need to be entered into Event Tracker:

- Traveling for and/or attending training that is NOT part of a conference
- Participating in virtual conferences (unless the employee is speaking and/or requesting acceptance of an offer from a non-Federal source), and
- Traveling to perform essential mission functions (e.g., work with other agencies/customers, groundbreaking dedication, or memorial ceremonies, site visits, litigation, audits, etc.).

Co-sponsoring Events

The review and approval process in Event Tracker varies depending on event and request types, so it is crucial that activities are properly entered into Event Tracker. When GSA is co-sponsoring an event, it must be indicated in the application through an event request for a GSA sponsored conference and “yes” must be selected in the co-sponsoring field. GSA employees should use the following guidelines for determining if an event is co-sponsored, solely sponsored by GSA, or only involves attending a non-GSA sponsored event.

Sponsored/co-sponsored events have the following attributes (not inclusive):

- GSA is paying for meeting spaces, audio-visual equipment, and other fees;
- GSA is planning on using a third party event planner;
- GSA is partnering on all or part of the event;
- A memorandum of understanding or other agreement is entered into with a sponsor regarding GSA’s role (Note: A copy of the MOU must be submitted in the event request.);
- GSA participates in promotion of the event; and/or
- GSA plans or significantly contributes to the agenda and work sessions or provides more than half the speakers.

Attendance at non-GSA sponsored events typically have the following attributes (not inclusive):

- Participant is merely attending or speaking at the event without other GSA involvement;
- Participant is paying for booth/exhibit fees to promote GSA programs; and/or
- None of the sponsored/co-sponsored attributes apply.