

# NASA Interim Directive

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## Requirements Relating to Conference Attendance and Reporting

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Responsible Office: Office of the Chief Financial Officer

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## PREFACE

### P.1 PURPOSE

This National Aeronautics and Space Administration (NASA) Interim Directive (NID) provides requirements for conference reporting and limiting attendance at foreign conferences.

### P.2 APPLICABILITY

This NID is applicable to NASA Headquarters and NASA Centers, including Component Facilities and Technical and Service Support Centers. It applies to JPL, other contractors, grant recipients, or parties to agreements only to the extent specified or referenced in the appropriate contracts, grants, or agreements.

### P.3 AUTHORITY

- a. Consolidated Appropriations Act, 2010, Public Law 111-117
- b. Omnibus Appropriations Act, 2009, Public Law 111-8 (including S. Rep. 110-397)
- c. NASA Authorization Act of 2008, Public Law 110-422
- d. Consolidated Appropriations Act, 2008, Public Law 110-161
- e. 5 U.S.C. §§ 4109-4110, "Government Employees Training Act"
- f. Federal Travel Regulation § 301-74.19, "What records must we maintain to document the selection of a conference site?" and Appendix C, "Standard Data Elements for Federal Travel"

### P.4 APPLICABLE DOCUMENTS

- a. NASA Policy Directive (NPD) 1440.6, "NASA Records Management"
- b. NASA Procedural Requirement (NPR) 1441.1, "NASA Records Retention Schedules"
- c. NPR 9700.1, "Travel"

### P.5 MEASUREMENT/VERIFICATION

Quality assurance reviews and analysis of travel, financial, and budgetary reports will be used to measure compliance with this NID.

### P.6 CANCELLATION

None; NID 9312.2, dated April 09, 2009, remains in effect but applies only to the extent of any continued use of PY 2009 funds for any conference.

## **1. Overview**

1.1. This Directive sets forth policies relating to conference attendance and reporting requirements.

## **2. Agency Requirements**

2.1. The Consolidated Appropriations Act, 2010, Public Law 111-117 (the 2010 Appropriations Act), requires that the National Aeronautics and Space Administration (NASA) limit travel to any single conference outside of the United States (a “foreign conference”) to no more than 50 NASA employees. This limitation is the same as limitations in recent appropriations acts, and in particular the Omnibus Appropriations Act of 2009, Public Law 111-8 (the 2009 Appropriations Act).

2.2. The NASA Authorization Act of 2008, Public Law 110-422 (the 2008 Authorization Act), limited funding for conferences to “not more than \$5,000,000 for any expenses related to conferences, including conference programs, travel costs, and related expenses,” and placed special limitations on Space Flight Awareness Award events. However, these funding limitations have not been extended and only apply to program year (PY) 2009 funds otherwise remaining available for use in the current fiscal year.

2.3. In addition to the above continuing limitations, the 2008 Authorization Act also required that NASA provide detailed quarterly reports to NASA’s Inspector General for NASA-Sponsored Conferences costing more than \$20,000. While this requirement has not been carried forward into the 2010 Appropriations Act, NASA will continue to collect and review this information internally.

2.4. Finally, Congress also directed NASA to provide a report related to all conferences attended by NASA employees in FY2009, following similar direction of the FY 2008 Consolidated Appropriations Act, Public Law 110-161, for a report in FY2008. In addition, in the Explanatory Statement to the 2009 Omnibus Appropriations Act, Congress requested the Agency to provide a report to Congress on conference activities for FY2009. Despite the process improvements achieved by NASA in the course of its conference reporting activities in 2008 and 2009, this universal requirement has proven the most labor-intensive and costly to implement, and NASA has determined that it is not in the best interests of the Agency to continue expending the considerable resources needed to collect and validate the information needed for detailed reporting for each domestic conference attended, though the Agency will continue monitoring these costs in less detail for internal use. In addition, there has been no further direction from Congress to continue reporting at the previously required level of detail. Accordingly, certain reporting requirements relating solely to domestic (U.S.) conferences not sponsored by NASA are no longer required in this Directive.

## **3. Roles and Responsibilities**

3.1. The Office of the Chief Financial Officer (OCFO) shall: maintain policies and procedures for conference-related data collection and reporting; coordinate the final

review of the quarterly sponsored conference reports; and designate an Agency travel policy coordinator to oversee these processes. The Agency travel policy coordinator shall, in the event of conflicting determinations by conference points of contact (POCs), issue final determinations under this Directive.

3.2. Each Center Chief Financial Officer (CFO) and Official-in-Charge of a Headquarters Office shall designate a conference POC and alternate for their respective Centers and Offices.

3.3. Each POC shall: help travelers and travel preparers determine whether a given event meets this Directive's definition of "conference;" help the NCTS moderator and Agency travel policy coordinator resolve conference determination questions; ensure that any conference sponsored by their Office or Center is promptly entered into NCTS and notice is provided to NASA travelers, and that forms required by this Directive are promptly filed; oversee the review and correction of their organization's data and other conference report information; provide other assistance as requested by the NCTS moderator and Agency travel policy coordinator in the timely preparation, review, and completion of conference reports; and assist with local Center or Office training and awareness efforts pertaining to this Directive.

3.4. The NASA Shared Service Center (NSSC) shall maintain the NASA Conference Tracking System (NCTS) and assign an NCTS moderator to process requests for new conferences to be added to the NCTS database. As part of this role, the NCTS moderator shall maintain the Agency conference reporting mailbox, coordinate with the POCs and Agency travel policy coordinator resolution of any requests for conference determination and the updating of NCTS as needed, and assist the OCFO in maintaining reporting information received from conference sponsors and providing quarterly summaries to management.

3.5. The NASA Enterprise Applications Competency Center (NEACC) is currently reviewing the implementation of a change permitting NCTS codes to be selected using the function code field when a traveler or travel preparer prepares a FedTraveler travel authorization. Once this change is implemented, NEACC shall maintain a regularly updated list of NCTS codes available for selection in the travel authorization function code field.

#### **4. Applicability and Definition of "Conference" and "Reportable"**

4.1. Applicability. The policies in this Directive apply to all NASA offices, travelers, and those involved in the funding, acquisition or training processes that support conference sponsorship or attendance. All NASA travelers and all personnel incurring procurement obligations and expenses must familiarize themselves and comply with its requirements. The NASA Conference website (<http://conference.nasa.gov>) provides mandatory detailed operating procedures for identifying conferences and their NCTS Identifier codes (*see* Section 7 below) in travel and procurement requests, approving travel, limiting foreign conference attendance, and preparing reports on conference attendance and sponsorship.

4.2. Definition of a Conference. For purposes of both conference reporting and foreign conference attendance limitation, “conference” means a meeting:

- a. Held for consultation, exchange of information, or discussion; and
- b. Having speakers or discussion panels focusing on matters of interest to and involving participation of a range of attendees from multiple agencies and/or nongovernmental entities; and
- c. At least part of which is held at a non-NASA facility; and
- d. Which is neither a NASA internal meeting (including operational meetings) nor formal training (*see* 4.3. below).

4.3. NASA Internal Meetings and Formal Training are Excluded.

4.3.1. NASA Internal Meetings.

4.3.1.1. A NASA internal meeting is a meeting whose attendees consist only of: (a) NASA civil servants, detailees, Special Government Employees, or individuals attending on NASA-issued invitational travel orders (“NASA Attendees”); or (b) NASA employees and employees of other Federal agencies, NASA contractors or subcontractors, or parties to inter-governmental or interagency agreements with NASA or the U.S. Government, when meeting on matters related to NASA’s programs or operations. It may include NASA grantees, their principal investigators, and co-investigators, when meeting on matters directly related to the work performed under a grant. It also may include NASA Space Act Agreement partners, when meeting on matters directly related to the activities covered under the Agreement.

4.3.1.2. Thus, the conference reporting requirement does not apply to the execution of routine NASA business, such as program or project reviews and meetings, meetings of international governmental officials for the purpose of coordination on technical, operational, or programmatic matters, site visits and launch functions, advisory committee meetings, and public affairs activities supporting events to which the general public is invited with no fee. If the sole purpose of the meeting is to discuss NASA business, such as scientific, technical, business, or programmatic actions, plans, or priorities for a specific NASA program, project, or mission support matter, then the meeting is not a conference for purposes of this Directive. Where a meeting is otherwise an internal NASA meeting, the presence of outside speakers or facilitators does not in itself make the meeting a “conference.”

#### 4.3.2. Formal Training.

4.3.2.1. The definition of conference does not include meetings limited to formal training of NASA employees. An established course of instruction in a substantive field in a classroom setting is not considered a conference, and similar coursework held at a rented facility is not thereby transformed into a conference. On the other hand, where a conference has a training aspect, e.g., helping employees maintain certification requirements or earn continuing education credits, but more closely meets the definition of “conference” than that of “training,” it should be treated as a conference. Many conferences include the presentation of substantive materials that are educational in nature, but which do not meet the definition of formal training.

4.3.2.2. Training is defined as 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 that will improve individual and organizational performance and assist in achieving the Agency’s mission and performance goals.

4.4. Reportable Conference. As used in this Directive, the term “Reportable Conference” means a conference that is either (a) a foreign conference (*see* section 5 below), or (b) NASA-Sponsored Conference (*see* section 6 below).

### 5. Foreign Conferences.

5.1. Definition and Attendance Limitation. In accordance with NASA’s annual Appropriations Acts, most recently the 2010 Consolidated Appropriations Act, no more than 50 NASA employees may attend a conference held outside the United States. This includes employees whose travel is fully reimbursable.

5.1.1. “United States,” as defined in the FTR, means the 48 contiguous States, the District of Columbia, and the states and areas defined under the term “Non-Foreign Area.” Non-Foreign Area includes Alaska and Hawaii; the Commonwealths of Puerto Rico, Guam, and the Northern Mariana Islands; and the territories and possessions of the United States (excluding the Trust Territories of the Pacific Islands). ( See FTR § 300-3.1) For purposes of this attendance limit, an event that would otherwise be excluded from the definition of “conference” because it is held entirely at a NASA facility will still be considered a “foreign conference” when the facility is outside the United States.

5.2. A foreign conference is considered “non-program” foreign travel. (See Appendix A, §301-2.13.) In instances where a particular trip mixes travel to a foreign conference with other purposes, the procedures for “non-program” travel are to be followed. The requirements of this section do not replace, but are in addition to, other Agency or Center requirements for foreign travel approval.

5.3. Officials-in-Charge and Foreign Travel Coordinators shall ensure foreign travel requests are submitted at least four weeks before the planned departure date, foreign travel reports are submitted weekly to the Office of External Relations, and NCTS is used consistently.

5.4. NCTS and Foreign Conferences. NASA's automated system for identifying conferences and tracking foreign conferences, NCTS (see section 7 below), shall be used to comply with the foreign conference requirements. NCTS assigns foreign conferences a unique identifier that must be used on all associated travel and payment documents. NCTS also enables foreign conference travel approvers to register the name of a prospective attendee and receive automated verification that the attendee limit has not been reached prior to approving travel. NCTS automatically accepts requests up to an Agency moderator-established first threshold, permitting automatic NCTS approval of names for conferences that only a small number of NASA employees are expected to attend. For conferences for which a larger NASA attendance appears likely, once the first threshold has been reached, the moderator will manually accept registration for the remaining spaces as approved by a NASA POC (currently the Office of External Relations, working with other offices and Centers) for Agency-wide allotments, but never exceeding 50 total. Once approved in NCTS, the travel request should be processed for approval in accordance with other established Center or Headquarters procedures for foreign travel. Note that NCTS approval pertains only to the 50-person limit; it in no way substitutes for the need for travelers to secure their supervisors' approval to attend a given conference.

5.5. Foreign Conference POCs. Due to diverse operational practices but the need to coordinate foreign travel across the Agency, Centers and Headquarters Offices are required to designate a person to be the single POC or coordinator for monitoring travel to foreign conferences in accordance with NASA Federal Travel Regulations Supplement (NPR 9700.1, Appendix A, § 301-2.7). However, all approvers remain responsible for approving only those foreign conference travel requests that fall within the threshold of 50 attendees (NASA-wide) to any one foreign conference.

## **6. NASA-Sponsored Conferences and Other NASA-Sponsored Events**

6.1. General Definitions and Applicability. A NASA-Sponsored Conference is a "conference" (see Section 4 above) of which NASA is a "primary sponsor" as defined in Section 6.2 below. Other events addressed in this section are events that do not meet paragraph 4's definition of conference but for which NASA pays sponsorship costs as defined below. These definitions establish which forms and/or reports are required for a given event; sponsors should read this entire section carefully to determine how it applies to their NASA-sponsored conference or other event.

### **6.2. Definition of "Sponsor" and "Primary Sponsor"**

6.2.1. NASA is considered a "sponsor" if it funds costs for hosting (e.g., facility rental) or underwriting (e.g., financial support to another sponsor of the

conference, brand awareness at the event, etc.) that are more than *de minimis* in amount.

6.2.2. NASA is not considered a sponsor based solely on participation costs such as for travel, exhibitions, or presentations. Further, a NASA cooperative agreement or grant does not typically constitute NASA sponsorship of an awardee's conference even if part of the award is used to pay conference hosting costs, since these are program-specific awards; however, if the agreement or grant specifically requires the recipient to host (and not just disseminate results at) a conference on behalf of NASA, the conference is considered sponsored by NASA and is reportable if NASA is a primary sponsor.

6.2.3. NASA is considered a "primary sponsor" only if it is the principal sponsor of the event, or one of the principal co-sponsors if there are multiple sponsors. Where NASA and one or more other sponsors split the cost, or NASA pays (to the best of its information) approximately the same as the other largest payors of hosting costs, it is considered one of the primary sponsors. However, where the largest contributor pays substantially more in hosting costs than NASA (e.g., over twice what NASA pays), NASA is not considered a "primary" sponsor.

6.2.4. In the event multiple Offices or Centers fund a NASA-Sponsored Conference or other NASA-Sponsored event, the Office or Center responsible for approving the site selection shall be responsible for preparing the NASA Form (NF) 1784, NF 1785, and/or any related reports that may be required, and its POC shall be responsible for insuring their accurate and timely submission.

6.3. Use of NASA or Federal sites for NASA-Sponsored Events. For both conference and non-conference events, sponsoring organizations shall make every reasonable effort to select as the event site a NASA or other Federal facility. In the case of NASA-sponsored conferences and offsite meetings (see Section 6.5.2. below), the sponsor shall clearly explain the reason for selecting a non-Federal facility.

6.4. Registration Fees. As a general rule, Federal agencies do not have the authority to collect registration fees for conferences or other events it sponsors. Even if a Space Act Agreement allows the partner to collect registration fees, there may be other fiscal concerns such as augmentation of Agency appropriations. Therefore, any sponsoring NASA organization considering charging fees as part of a NASA-sponsored conference or other event shall consult with local counsel before proceeding.

#### 6.5. NF 1784, the NASA-Sponsored Event Approval Form

6.5.1. Purpose. The NF 1784 estimates the likely cost and attendance of a future NASA-sponsored event. It also ensures that, per the Federal Travel Regulations (FTR) and the NASA FTR Supplement (NFTRS), the sponsoring office has developed cost estimates for several alternative venues to inform the approving

official's site decision; has considered NASA or other Federal sites; and has analyzed and made reasonable efforts to control food and beverage costs.

6.5.2. Required Use. An NF 1784 is required for

- a. Any NASA-Sponsored Conference;
- b. Other qualifying NASA-Sponsored Offsite Meetings. A qualifying NASA-Sponsored Offsite Meeting is any event that is (a) likely to have 30 or more attendees, and (b) is sponsored or funded in whole or part by NASA, and (c) will be held at a non-NASA facility selected and rented by NASA or at NASA's direction (e.g., by a support services contractor).

6.5.3. Forms and Instructions. The NF 1784, detailed instructions, and further guidance are available at <http://conference.nasa.gov>.

6.5.4. Required Signatures.

6.5.4.1. The POC shall review the NF 1784 for completeness and accuracy, sign it, and be prepared to fully substantiate the cost estimates and any supporting documentation to the satisfaction of the approving official.

6.5.4.2. The 1784 shall be approved and signed by a responsible senior executive (Senior Executive Service or SL/ST) within the sponsoring organization.

6.5.5. Submitting the NF 1784. The POC of the sponsoring organization shall submit a final signed NF 1784 along with required supporting information

- a. To the NSSC in pdf form via [NSSC@NASA.gov](mailto:NSSC@NASA.gov), with the email subject line "NF 1784 - " followed by the NCTS Identifier (for conferences) and the official name of the event,
- b. At least 30 days before the start of the event, and
- c. Before committing non-refundable funds for any costs associated with the event (e.g., site deposit, catering contracts, etc.), with the exception of funds for conference support contractor costs associated with preparations leading up to and including event site selection and preparing the NF 1784.

6.6. NF 1785, the NASA-Sponsored Conference Reporting Form

6.6.1. Purpose. The NF 1785 records a conference's actual costs, attendance data, contract features, and other related information. It is used for internal management reviews and is made available as appropriate for external reviews.

6.6.2. Required Use. An NF 1785 is required for any NASA-Sponsored Conference whose total actual costs (including travel) exceed \$20,000.

6.6.3. Forms and Instructions. The NF 1785, detailed instructions, and further guidance are available at <http://conference.nasa.gov>.

6.6.4. Required Signatures

6.6.4.1. The POC shall review the NF 1785 for completeness and accuracy, sign it, and be prepared to fully substantiate the cost estimates and any supporting documentation to the satisfaction of the approving official.

6.5.4.2. The NF 1785 shall be approved and signed by the responsible official who signed the event's NF 1784 or, if that official is unavailable, another cognizant senior executive (Senior Executive Service or SL/ST) within the sponsoring organization.

6.6.5. Submitting the NF 1785. The POC of the sponsoring organization shall submit a final signed NF 1785 along with required supporting forms and data:

a. To the NSSC in pdf form via [NSSC@NASA.gov](mailto:NSSC@NASA.gov) , with the email subject line "NF 1785 - " followed by the entire NCTS Identifier (number/name).

b. No later than 30 days after the end of the event.

6.7. Roles and Responsibilities for NASA-Sponsored Events and Related Forms and Reports

6.7.1. The conference POC is responsible for coordinating all aspects of the event's planning, execution, and reporting. This includes the following:

6.7.1.1. For reportable NASA-sponsored conferences, the POC is responsible for generating an accurate Final Attendee List recording who actually attended the event; obtaining and maintaining a copy of all invoices, receipts, and purchase orders, task orders, and other financial documents associated with the conference; assisting the approving official as requested to prepare the NF 1784, NF 1785, and other required information; forwarding these documents to NSSC as required; and maintaining copies of these documents and making them available upon request to appropriate reviewers.

6.7.1.2. For NASA-sponsored offsite events that are expected to cost over \$20,000, including travel costs, but that are not conferences, the POC is responsible for assisting the approving official as requested to prepare the NF 1784 and other required information; forwarding them to NSSC as

required; and maintaining copies of these documents and making them available upon request to appropriate reviewers.

6.7.2. The approving official is responsible for the quality and integrity of the data in the NF 1784, the NF 1785 (if required), and any associated required reports and supporting documents, and for that of any analyses upon which these documents are based. Therefore, the approving official is responsible for assigning appropriate staff as needed to work with the POC to prepare these documents. The approving official is also responsible for ensuring copies of all documents listed in 6.7.1. above are maintained and that preparers are available to explain them to reviewers (e.g., auditors) as requested.

6.7.3. The approving official is responsible for knowledgeably approving the conference site that he or she finds to be in the best interest of the government.

6.7.4. The Agency travel policy coordinator is responsible for periodically reviewing for internal consistency the NF 1784s and NF 1785s and related report information submitted, notifying the conference sponsor POC of any obvious inconsistencies or other readily apparent need for revision, and making the final forms available for initial internal management review. The coordinator is also responsible for updating any requirements for related reports and documentation, making the updated information available at the Conference Resource Website, and answering questions about preparing these forms that are not fully addressed in the instructions or website.

6.7.5. The NCTS Moderator is responsible for maintaining searchable electronic records (e.g., pdfs) of all submitted NF 1784s and NF 1785s, together with attachments and quarterly summaries.

## **7. The NASA Conference Tracking System (NCTS)**

7.1. Purpose and Use of NCTS. NCTS is an Agency-wide database that supports this Directive's tracking and reporting requirements and standardizes and simplifies conference recordkeeping in related information systems. NCTS provides a searchable list of official conference names and identifier codes for Reportable Conferences (i.e., NASA-sponsored and foreign conferences). It is accessible to all NASA employees and NASA Conference Support Contractors at <http://ncts.nasa.gov>. All travel authorizations and vouchers for foreign and NASA-Sponsored Conferences (see Sections 5 and 6 above) must include the official NCTS Identifier (number/name) as specified in this NID. The NCTS database is populated based on requests of attendees, their travel preparers, and NASA conference sponsors, subject to validation by the NCTS Moderator.

7.1.1. All NASA personnel connected with conference-related travel or charges must familiarize themselves with NCTS. Such personnel include conference sponsors, attendees, approvers, travel coordinators, and those requesting or approving obligations or charges connected with conferences. They must know both how to search NCTS for conferences already in the database and how to input new events for potential inclusion. Directions for both procedures are outlined in this Directive and provided in more detail at the NASA Conference Resource website, <http://conference.nasa.gov>.

7.1.2. The NCTS Identifier is a unique name/number NCTS assigns each Reportable Conference. If an event is not already in the NCTS database, users (or their Center preparers, depending on Center process) shall fill out and submit the electronic entry form found at the NCTS website. The Moderator reviews the input for completeness, assigns a unique conference Identifier, lists the new conference record in NCTS, and emails a confirmation to the requestor, typically within one working day.

7.1.3. In general, the users listed in 7.1.1 can readily determine without assistance whether an event is a reportable conference per the criteria in this Directive, and should be input to NCTS, or is not a reportable conference. However, in instances where the users cannot determine whether an event is a reportable conference, they shall fill out and send to their Center Conference Reporting POC a Conference Determination Request Form (CDRF). The list of POCs and the CDRF are available at <http://conference.nasa.gov>.

7.1.4. While technically any employee can submit a conference directly for possible inclusion in NCTS, individual Centers vary regarding whether such inputs must go through Center travel coordinators. Thus, NASA employees shall familiarize themselves with and follow their local Center requirements. For questions, contact your Center travel coordinator or Center Conference Reporting POC.

## **8. Preparing Travel Requests**

8.1. Trip Purpose. Persons preparing travel requests involving any conference attendance shall select “Conference” in the FedTraveler Trip Purpose field.

8.1.1. Users shall select “Conference” only for trips that include events meeting the definition of “conference” in Section 4.

8.1.2. Users shall select “Conference” for all conferences, even those that are domestic and non-NASA-sponsored. This enables compliance with the FTR and with other summary-level GSA travel reporting requirements.

8.1.3. Users shall select “Conference” for any trip that involves a conference. This includes trips that include conferences but have multiple purposes, even if some of the purposes are not conference-related.

8.2. NCTS Identifier. For reportable (foreign or NASA-Sponsored) conferences only, users shall also insert the unique NCTS Identifier (number/name) into the travel record to facilitate required foreign and NASA-Sponsored Conference recordkeeping and reporting. The following sections describe procedures to be used now (i.e., when this Directive is issued), as well as future procedures to be used when planned system enhancements are implemented.

8.2.1. Initial Process—Enter in Comments Field of the FedTraveler record (e.g., New Travel Authorization, or Local Expense Report if applicable). Until future eTravel system enhancements are completed, users shall copy the conference identifier from NCTS into the Trip Purpose Description comments field.

8.2.2. Revised Process—Select NCTS Identifier Using FedTraveler Function Code Field. NASA is currently reviewing the replacement of the current process with a more automated approach, starting in FY 2011, allowing selection of NCTS codes via the the FedTraveler function code field. Upon implementation of this enhancement, users will be notified via the FedTraveler launch page and the Conference website, and will be provided detailed instructions for selecting NCTS codes from a drop-down list in the function code field. This upgrade will enable contemporaneous reports on Reportable Conference travel via Business Warehouse.

8.3. SATERN External Training Requests -- Non-Travel Costs. The steps described above provide for required tracking and reporting of conference travel costs (as well as foreign conference attendance). As a result, there are no special requirements for entering conference-related data into SATERN or other purchase systems. Persons incurring non-travel costs connected with a NASA-Sponsored Conference shall contact the sponsoring organization's POC for any special instructions on providing the POC any cost information and supporting documents the POC will need to prepare the NF1785 report.

8.4. The only conference-related expenses that shall be reported for NASA contractors are costs of conference support contracts (all associated costs, including contractor labor and burden) in direct support of NASA-sponsored conferences (*see* Section 9 below).

## **9. Reportable Expenses for NASA-Sponsored Conferences.**

9. 1. NASA's 2008 Authorization Act broadly stated that NASA is to report costs relating to conferences held by NASA in FY 2009. In addition, the Agency was limited to spending no more than \$5 million on any expenses related to conferences with PY 2009 funds, which required very detailed tracking of conference-related costs. This requirement was applied to FY2009 conferences to include conference expenses regardless of whether or not NASA was the sponsor. However, in view of the less restrictive requirement in force going forward, the requirement of reporting conference costs are only applied now to NASA-Sponsored Conferences.

9.2. Reportable expenses for NASA-Sponsored Conferences include both travel (e.g., transportation, lodging, per diem and other travel expenses) and non-travel costs (e.g., cost of developing conference materials and other costs associated with supporting a conference, such as handouts, exhibits, facility rental, etc.).

9.2.1. Reportable costs include costs for employees to attend conferences as judges, speakers, presenters, or panelists. They also include costs for detailees and persons traveling on invitational travel orders or otherwise sent to a NASA-Sponsored Conference by the Agency.

9.2.2. Civil servant salaries are not reportable as they are not “related to conferences,” even for the period during which a person is attending a conference.<sup>1</sup>

9.2.3. Conference costs paid for under a grant or cooperative agreement are not reportable as NASA-Sponsored Conference costs, except where the recipient is required to host (and not just disseminate results at) a conference on behalf of NASA using the awarded funds.

9.3. Section 13 of this Appendix provides a list of frequently asked questions and answers concerning conference requirements. Additional information, including the NCTS links, an NCTS user guide, reporting-related instructions and other documents, and a list of the NASA Center Conference Reporting POCS, may also be found at the NASA Conference website, <http://conference.nasa.gov>

## **10. Program Year 2009 Appropriations Spending Cap**

10.1. The appropriations limitation on conference expenditures in the 2008 Authorization Act required that NASA be able to consistently apply rules for obligating and expending program year 2009 funds and reporting expenses attributable to conferences. In order for NASA to comply with this requirement during FY 2009, the authorized \$5 million was allocated to special conference projects in conference work breakdown structure (WBS) accounting codes. Stricter guidance and procedures were also promulgated to ensure these funds were adequately tracked and reported.

10.2. In view of the continuing limitation on funds appropriated under the 2009 Appropriations Act, PY 2009 funds are prohibited from being used to incur any new commitments or obligations in connection with a conference. For purposes of this paragraph, the term “conference” shall also include NASA-sponsored events that meet the definition of “conference” under NASA Interim Directive (NID) 9312.2 (including events not otherwise conferences but for meeting the “food exception” under NID 9312.2). The sole exception to this prohibition is that commitments and obligations in

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<sup>1</sup> This is distinct from treatment under the 50-person limit on attendance at international conferences; while salary is not generally considered a cost, unless a NASA employee is traveling to a foreign conference on his or her own time (i.e., not representing NASA) and at no expense to NASA, the employee is counted for purposes of the 50-person limitation.

the form of upward adjustments directly related to authorized conference travel approved in FedTraveler prior to September 30, 2009, may be made after September 30, 2009, along with all appropriate costing and disbursements on obligations approved prior to September 30, 2009 (and related upward adjustments thereon). Any requests for exceptions to the prohibition of this section must be submitted in writing and approved by the OCFO Director, Policy Division.

10.3. Since there is no special limitation on the use of PY 2010 funds for conferences, and further use of PY 2009 funds for conferences is generally prohibited, a number of the procedures implemented to control obligations and spending in FY 2009 are no longer necessary. Thus, the requirement in NID 9312.2 distinguishing between Administrative/Other versus Scientific/Technical Conferences, the use of specific conference work breakdown structure (WBS) accounting codes, the restriction on use of SATERN, and the special “food exception,” do not apply to the use of PY 2010 and subsequent year funds.

## **11. Records Management.**

11.1. The sponsoring organization shall maintain copies of the NF 1784 and NF 1785, all required associate reports and other documents, and any other materials needed to substantiate them, and make them available for inspection as requested by appropriate oversight organizations.

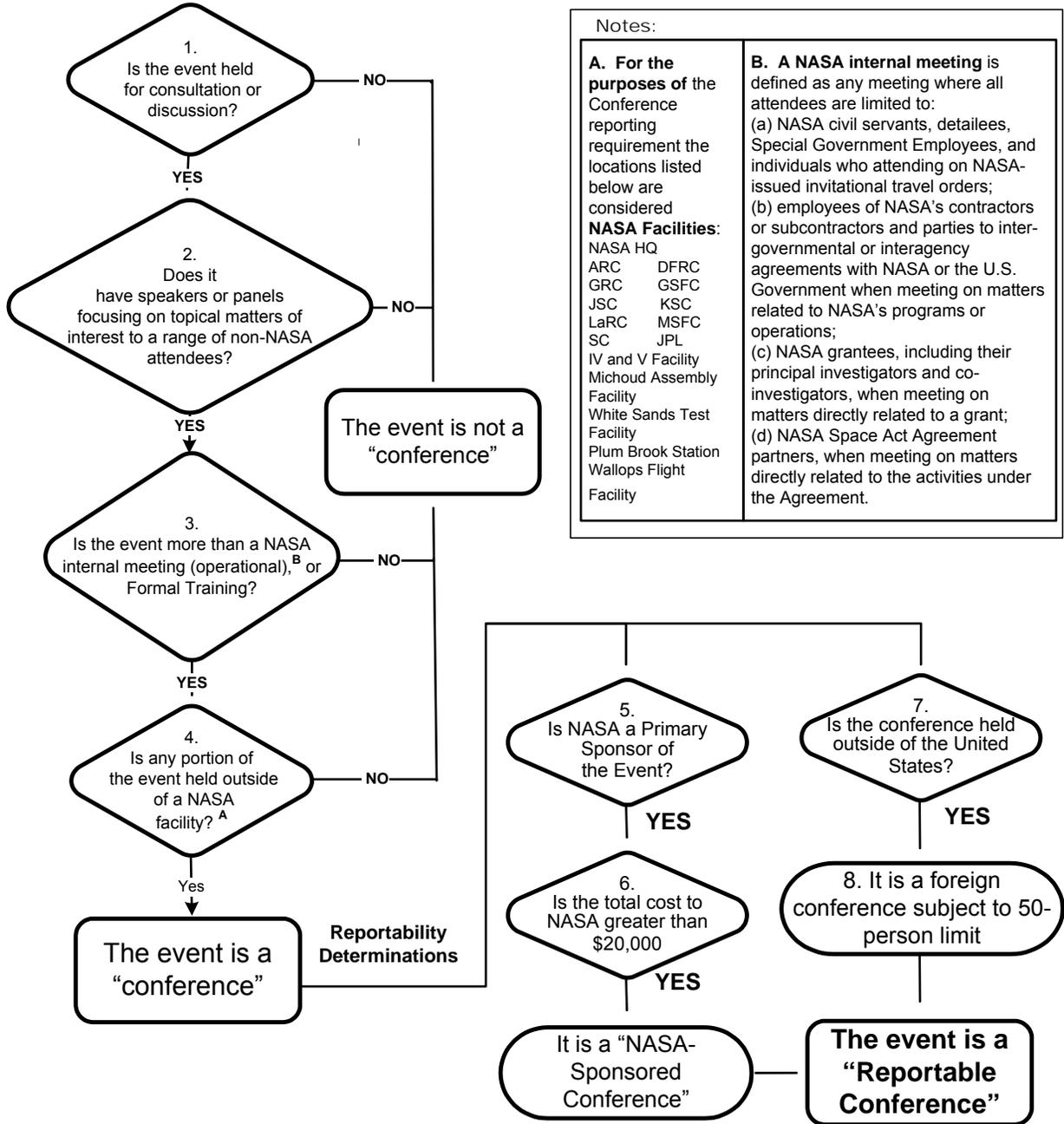
11.2. The NSSC shall maintain searchable electronic records (e.g., pdfs) of all submitted NF 1784s and NF 1785s, together with attachments and quarterly summaries.

## **12. Reportable Conference Decision Chart**

The Reportable Conference Decision Chart on the next page provides additional information to use to determine what qualifies as a “conference” and which conferences are “reportable,” i.e., which conferences are NASA-sponsored or foreign and must therefore be included in NCTS. Most travel is non-conference and readily identifiable as such, and most conferences are “non-reportable.” Note however that even for non-reportable conferences, travelers must continue to select “conference” as the trip purpose in e-Travel to facilitate large-scale tracking of NASA conference-related costs.

Thus, travelers and other users should use the decision chart and the related FAQs in Section 13 to determine whether an event is a conference, and whether it needs to be reported using NCTS. Should you need assistance applying these guidelines, consult your Center or HQ Office Conference POC. The POC may ask you to submit a Conference Determination Request Form (CDRF) to facilitate the decision. A list of POCs, and the CDRF form are available at the Conference Resource website (<http://conference.nasa.gov>).

**Criteria for Determining What Is a "Reportable Conference?"**



**Notes:**

<p><b>A. For the purposes of the Conference reporting requirement the locations listed below are considered</b>  <b>NASA Facilities:</b>          NASA HQ          ARC    DFRC          GRC    GSFC          JSC    KSC          LaRC   MSFC          SC     JPL          IV and V Facility          Michoud Assembly Facility          White Sands Test Facility          Plum Brook Station          Wallops Flight Facility</p>	<p><b>B. A NASA internal meeting is defined as any meeting where all attendees are limited to:</b>          (a) NASA civil servants, detailees, Special Government Employees, and individuals who attending on NASA-issued invitational travel orders;          (b) employees of NASA's contractors or subcontractors and parties to inter-governmental or interagency agreements with NASA or the U.S. Government when meeting on matters related to NASA's programs or operations;          (c) NASA grantees, including their principal investigators and co-investigators, when meeting on matters directly related to a grant;          (d) NASA Space Act Agreement partners, when meeting on matters directly related to the activities under the Agreement.</p>
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### 13. Frequently Asked Questions (FAQ) about “Conferences”

The following FAQs provide more detailed guidance on how to use the Reportable Conference Decision Chart for consistent conference tracking and reporting. Most of the FAQ’s are numbered according to the Chart’s numbered criteria for what is a conference; additional FAQs address other common conference-related issues.

1. Is the event being held for consultation, exchange of information, or discussion?

FAQ 1-1 (*name includes “conference”*). Are all meetings with “conference” in the title Conferences?

Answer: Usually, but not always. Titles can be misleading. What matters is the purpose of the event, not whether its title includes “conference,” “meeting,” “exchange,” or “discussion,” etc. Thus, if you are aware of additional information indicating that an event entitled “conference” is actually a program-specific event as opposed to a topical event of more general interest (see FAQ 2 below), it should not be considered as held for “consultation, exchange of information, or discussion,” and is hence not a conference.

2. Does the event have speakers or discussion panels focusing on matters which are of interest to and involve the participation of a range of participants from multiple agencies and/or nongovernmental entities?

FAQ 2-1 (*working groups*). Are “working groups” considered conferences?

Answer: Generally, no, but you cannot rely on a title alone. For example, “working group” meetings held in conjunction with association conferences, even if closed to all but subcommittee membership, are typically considered part of a conference. However, “working groups” of members from two or three agencies addressing a specific, common operational issue (e.g., financial or personnel system configuration), and not a broader range of topical matters, are not considered “conferences.”

FAQ 2-3 (*presenters or judges*). If a NASA employee serves as a speaker, presenter, or judge at a non-NASA event, does that constitute conference attendance?

Answer: Generally, yes. These presentations are typically done for general outreach and awareness. This includes speakers’ bureau events. However, the presence of an outside facilitator does not turn a NASA internal meeting into a conference.

FAQ 2-4 (*speakers at schools*). Is a NASA speaker (including an astronaut appearance) presenting at a local school (elementary, middle, or high) considered conference attendance?

Answer: No.

FAQ 2-5 (*festivals or state fairs*). Are events such as festivals or state fairs that require a small entrance fee considered conferences?

Answer: No.

FAQ 2-6 (*college degrees*). Is travel/TDY in connection with NASA-paid education in pursuit of a college degree considered a conference?

Answer: No. This is not a discrete event such as is typically connoted by the term “conference” (i.e., from several hours to a week or two), but rather an ongoing, periodic activity in furtherance of the Agency’s mission and performance goals.

FAQ 2-8 (*grants and cooperative agreements*). When NASA grantees participate in “conferences,” are those costs to be reported?

Answer: No, except where the grant specifically requires the recipient to host (and not just disseminate results at) a conference on behalf of NASA with the awarded funds, and the conference otherwise meets the criteria of a NASA-Sponsored Conference.

### 3. Is the event an internal NASA meeting or Formal Training?

In order for an event to be considered a conference, it must be more than just an internal NASA meeting or Formal Training.

FAQ 3-1 (*management/governance meetings*). Are internal meetings (operational programmatic and institutional management meetings), such as those required in NPD 7120.4, NPR 7120.5, and NPR 7120.5, considered conferences?

Answer: No. Internal meetings are not considered conferences if specifically for the purpose of governance of NASA or one of its organizational units, or for carrying out a NASA program or project (i.e., an operational or “program-specific” purpose). Examples would include the NASA Advisory Council (NAC), Program Management Council (SMC), and the like.

FAQ 3-2 (*program meetings*). Based on the use of broad terms like “discussion” in the definition of conference, i.e., “event held for consultation, exchange of information, or discussion,” it almost sounds like many gatherings of NASA civil servants with non-NASA persons would be considered conferences. Is that correct?

Answer: No. Internal meetings are not considered conferences if specifically for the purpose of carrying out a NASA program or project (i.e., an operational “program-specific” purpose) or governance of NASA or one of its organizational units. The definition of conference does not encompass the execution of routine NASA business, such as program or project reviews and meetings, site visits and launches, advisory committee meetings, and public affairs activities such as exhibits and events to which the general public is invited with no fee. If the sole purpose of the meeting is to discuss NASA business, such as scientific, technical, business, or programmatic actions, plans, or priorities for a specific NASA program, project, or mission support matter, then the meeting is not a conference.

FAQ 3-3 (*program-specific vs. general nature*). Are events that have as their purpose “discussion” of a specific program considered conferences?

Answer: Generally, no, but some are. Where a meeting is held in connection with NASA-funded research, it could be either a conference or a NASA internal meeting. Dissemination of research results in a widely attended forum is often a conference. However, meetings which are intended to coordinate research activities and plan future research are more typically internal meetings. Where the focus of the meeting is not primarily on information exchange to non-program participants, but rather on discussing the progress of project research, coordination of activities, and identification of next steps/options with respect to a specific, funded project, the meeting is considered programmatic in nature and not a conference. In this latter case, the fact that other agencies, contractors, and grantees who are involved in the program are in attendance does not alter this conclusion. In cases where the program is not associated with a specific mission, the analysis may be more difficult. Where these meetings are open to the public, and may involve information exchange and discussion of results of a number of individual research projects, each must be considered on case-by-case basis, with careful assessment of the totality of the meeting's characteristics to make a determination.

Thus, an event is a conference if it has as its primary purpose promoting general awareness of a program, as opposed to specific planning, execution, or analysis of a program (including projects, grants, advisory panels and the like). For example:

- a. Fundamental Aeronautics Annual Conference is a reportable (NASA-sponsored) conference, since its basic purpose is promoting general awareness of the program, as further evidenced by attendees from the general public not specifically working on the program.
- b. Project Management (PM) Challenge was reportable in FY 2008, since it was of a topical nature of interest to a broader audience, and qualified as a formal conference. However, PM Challenge was not reportable in FY 2009 because it was structured as an internal NASA meeting.
- c. Fundamental Aeronautics Annual Review is not reportable, since it is a formal review of a program, with the non-NASA participants attending primarily as review panel members, not for general awareness.
- d. Quarterly Program Management Reviews are not conferences, even if off-site and attended by contractors or partners, as they focus on review of a program, not general awareness.
- e. Some additional examples of events determined not to be "conferences":
  - Required programmatic and institutional management meetings, including those identified in NPD 7120.4C, NPR 7120.5C, and NPR 7120.5D;
  - Formal education or training classes;
  - Planning, Programming, Budgeting, and Execution (PPBE) process budget reviews;
  - Routine program/project management meetings;
  - Mishap Investigation Boards (usually at contractor facilities);
  - Program Management Reviews;

- Management Council Meetings;
- Quarterly Program Management Reviews.

FAQ 3-4 (*division off-site meetings*). Is my team's off-site meeting considered a conference?

Answer: Generally, no. These typically fall within the exception for NASA internal meetings. If outside participants (and not just facilitators) are attending, the nature of the meeting may still exclude it from being considered a conference. For example, if the meeting is a lessons learned or strategic planning event, these are almost always narrowly operational or programmatic in focus. But broader, topical meetings or ones not strictly operational in focus (e.g., team-building events) may qualify as a conference.

FAQ 3-5 (*JPL and other NASA contractors*). Are events attended by JPL or other NASA contractor employees considered internal NASA meetings?

Answer: Yes. If attendance is limited to NASA civil servants and contractor employees, and the focus is on NASA programs or operations, these are not considered conferences.

FAQ 3-6 (*facilitators*). Do non-NASA facilitators, speakers, and presenters affect the determination of whether a meeting is a NASA internal meeting?

Answer: No. Outside facilitators and speakers are generally contractors participating in a manner related to NASA programs or operations. In those cases where speakers or presenters are not paid contractors, their presence as a speaker is typically related to operational or programmatic matters of NASA.

FAQ 3-7 (*training*). Are training events considered conferences?

Answer: Generally, no, but some are. Neither a specific, established course nor a set of courses in a classroom setting is considered a "conference." Similarly, attendance at a university, professional school, or the like is not considered a "conference," and a course held at rented facility because it overflowed classroom limits does not automatically become a "conference." However, a widely attended event featuring a variety of topical meetings held at a hotel or other conference facility is a conference. Even if the only purpose of an individual attendee is to receive updated training on a specific area and/or maintain a certification, the more general nature of meetings offered in a setting open to a broader, general audience makes it a conference.

For example, events that would be considered conferences include the U.S. Office of Government Ethics' annual Government Ethics Conference, the Annual Federal Dispute Resolution Conference, AIAA's Annual Conference on Small Satellites, the IEEE Workshop on Network Security, the High Tech Small Business Conference, and the Flight Test Safety Workshop (providing an open forum on flight test safety issues). An example of an event not considered a conference would be a semester-long University course or a professional school class. Also, remember to apply the other criteria for determining a conference or reportability, such as whether the event was off-site, or was NASA sponsored or foreign. For example, events held entirely at a NASA facility or at which there were only NASA participants would not be conferences.

4. Is any part of the event held outside of a NASA facility?

An event is not considered a conference if all of its sessions, meetings, presentations, and other activities are held on a NASA Facility.

FAQ 4-1 (*Agency*). Does “Agency” only mean NASA, or does it include other Federal agencies?

Answer: When used in the singular, “Agency” means NASA, and does not include other Government agencies.

FAQ 4-2 (*NASA facility*). What is considered a NASA “facility”?

Answer: The following sites and/or buildings are considered NASA facilities:

All Centers (ARC, DFRC, GRC, GSFC, JSC, KSC, LaRC, MSFC, SSC, and NASA HQs); and

JPL, IV & V Facility, Michoud Assembly Facility, White Sands Test Facility, Plum Brook Station, and Wallops Flight Facility.

A more complete listing is published at the conference website:

<http://conference.nasa.gov>.

FAQ 4-3 (*leased facilities*). Are facilities (office buildings, sites, etc.) leased by NASA on a continuing basis considered to be NASA facilities if they are not located within the boundaries of a NASA Center or other NASA facility identified in the Answer to FAQ 4.2?

Answer: Yes. Section 203(c)(3) of the Space Act authorizes the NASA Administrator to acquire facilities by purchase, lease, condemnation, or otherwise.

5. Was NASA a primary sponsor of the event?

FAQ 5-1 (*non-NASA costs*). If NASA pays for an exhibit booth or otherwise provides a minor level of funding in support of a conference, is the conference considered “held by” NASA (i.e., is NASA a “primary sponsor” of the conference)?

Answer: No. NASA is not considered a conference’s sponsor based solely on participation costs such as for travel, exhibitions, or presentations. Typical sponsorship costs include costs for hosting (e.g., for facility rental) or underwriting (e.g., for financial support to another sponsor of the conference, for brand awareness at the event, and the like) that are more than *de minimis* in amount. A grant award would not typically make NASA a sponsor, but is rather a program-specific award when used properly, even if part of the grant is used to pay for hosting costs of an event otherwise meeting the criteria of a “conference.” Further, NASA is not considered a primary sponsor of the conference unless it was the principal sponsor of the conference, or one of the principal co-sponsors if there were multiple sponsors putting on the conference. Finally, one should not assume

that use of NASA's logo at a conference means that NASA is a sponsor of that conference, there are other circumstances under which NASA's logo may be legitimately used.

6. Is the total cost to NASA greater than \$20,000?

For a conference to be reportable as "NASA-Sponsored," NASA must have been a primary sponsor AND have expended at least \$20,000 on the event, including both travel and non-travel costs. However, note that even if NASA paid no travel costs, if NASA's other costs for the event exceeded \$20,000 and NASA was a primary sponsor, the event is considered a reportable NASA-Sponsored Conference.

FAQ 6-1 (*non-NASA costs*). Is NASA required to report on costs incurred by other Federal Agencies?

Answer: No. If you have a record of actual costs of a NASA-Sponsored Conference that were ultimately paid by another Government agency, do not report those. For example, if NASA incurred conference costs but charged them back to another Agency via a reimbursable agreement, those costs should not be reported. Only those net realized costs shown by NASA's records need to be reported. For example, fully reimbursable travel arrangements for conference attendance are not reported; partially reimbursable arrangements are reported to the extent of the unreimbursed expenses.

FAQ 6-2 (*estimates/disbursements*). Is the "cost" of a conference based on recorded or estimated cost, or on the actual amounts disbursed?

Answer: The travel "cost" to be reported is the amount shown in Business Warehouse (BW) as follows. If disbursements are available, use them. However, since typically reports are required soon after the end of the travel, if disbursements are not available, use costs, and if costs are not available, use obligations. In all cases, indicate on the report whether you are using disbursements, costs, or obligations..

FAQ 6-3 (*contractor costs*). When NASA contractors participate in conferences, are those costs to reported?

Answer: In general, no. However, all costs of conference support contractors supporting NASA-sponsored conferences are reportable.

FAQ 6-4 (*support contractor costs*). For NASA-sponsored events, are all costs connected with conference support services contracts or work orders included, such as award fees and burden or other indirect charges?

Answer: Yes. For NASA-sponsored events that meet the definition of conference and where a contractor supports the NASA sponsor hosting the event (i.e., not just as an attendee) under a specific Work Order, Task Order, or the like, the total conference-related cost of the Task Order reportable.

7. Is the conference a “foreign conference”?

NASA is prohibited from sending more than 50 NASA employees to any one conference outside the United States.

FAQ 7-1 (*NASA funds available*). If funds are still available, does the 50-person limit on foreign conferences apply?

Answer: Yes. The limitation in this case is on number of attendees NASA sends, not their costs. Even if the only costs to NASA are indirect (e.g., salary, but all direct costs are paid for by conference sponsor), such attendees still count against the 50 person limit.

FAQ 7-2 (*NASA employees*). Are JPL employees considered NASA employees?

Answer: No. Only those persons considered employees for purposes of 5 U.S.C., such as NASA civil servants and detailees to NASA (for whom NASA is paying costs directly or by reimbursement to the detailing agency), are considered employees.

FAQ 7-3 (*foreign*). What is considered “outside the United States”?

Answer: “United States” has the same meaning as found in the Federal Travel Regulations, which define the United States to include the 48 contiguous States, the District of Columbia, and the states and areas defined under the term “Non-Foreign Area,” which includes the states of Alaska and Hawaii; the Commonwealths of Puerto Rico, Guam, and the Northern Mariana Islands; and the territories and possessions of the United States (excluding the Trust Territories of the Pacific Islands). A “foreign conference” includes conferences held entirely at a NASA facility if outside the United States.

FAQ 7-4 (*reimbursable travel*). If a NASA speaker is requested to present at an international conference, and the sponsor is willing to pay travel/per diem expenses, does the NASA speaker count against the 50-person limit?

Answer: Yes. A speaker or other NASA employee is still considered on official travel on behalf of the Government even when on reimbursable travel. On the other hand, if a NASA employee attends a foreign conference while on vacation, traveling at his or her own expense, and charges no conference costs to NASA (e.g., for shipping materials), that attendance would not count against the 50 person limit, as that limit is against use of appropriated funds “to send or otherwise pay for attendance” at a conference. However, to facilitate accurate records, all employees (even those on vacation) planning to attend a foreign conference must request attendance via NCTS and must obtain advance approval from the NASA Office of External Relations. Note: standard procedures for Agency acceptance of travel expenses from outside sources must be followed in the case of reimbursable travel. (See also FAQ 7-1 above.)

FAQ 8-1 (*single conference with multiple tracks vs multiple conferences*). If several foreign events are held contemporaneously but advertised as separate conferences, are they treated as separate conferences for purposes of the 50-person limit?

Answer: It depends. If conferences are structured in key aspects like a single event, they constitute a single conference for purposes of NASA’s foreign conference attendance

limitation. For example, the AIAA Guidance, Control, and Navigation and the AIAA Modeling and Simulation Technologies Conferences were advertised as separate conferences by AIAA in 2009 and 2010, but both were held at the same time and location, the same registration fee paid admission to sessions from both events, some sessions were listed in the agendas for both conferences, and a single fee could buy a program CD with materials from both events. They essentially functioned as two tracks in a single conference. On the other hand, if conferences are held separately in time (one after the other) and a separate registration fee is charged, they are considered distinct conferences even if held back to back at the same facility by the same sponsor. Similarly, independent meetings not part of the conference, such as those held in advance (like planning sessions) or at the same time (such as independent working group meetings held at the same time to take advantage of key participants being present at the same time and place) are treated as separate events; NASA employees attending these meetings but not otherwise attending the conference are not counted towards the 50 person limit for the conference.

8. Where can I find the procedures for approval to go to a conference?

User aides, procedures, and other information relating conferences can be found at the conference website: <http://conference.nasa.gov>.

FAQ 8-1 (*approval steps*). I want to go to a meeting that I think is a conference. What steps are required to get approval, and to submit a voucher for reimbursement, for the travel?

Answer: The following steps are typical for most travel:

1. Determine whether the event is a “conference” and whether it is foreign or NASA-Sponsored.
  - a. If you can readily tell it is NOT a conference, then proceed with travel authorization and vouchering as you have in the past.
  - b. If you can readily tell that it IS a conference but is neither foreign nor NASA-sponsored, select “Conference” in the FedTraveler Trip Purpose field, and proceed as usual for travel authorization and vouchering. Do not use an NCTS Identifier: only foreign and NASA-Sponsored Conferences now use NCTS Identifiers.
  - c. In all other cases (i.e., if the event is a conference AND is either foreign or NASA-Sponsored), go to the NASA Conference Tracking System (NCTS) site (<http://ncts.nasa.gov>) and search for the event.
2. Is the event listed in NCTS?
  - a. If it is, cut and paste the unique Conference Identifier (number/name) from NCTS into the trip purpose comments field of your travel authorization (or once the function codes option is enabled in an upcoming system upgrade, select the NCTS Identifier from the drop-down menu of function codes). Also, be sure to select “conference” as the trip purpose.
  - b. If the event not listed, but because it is either foreign or NASA-Sponsored you think it should be listed, submit a New Record in NCTS. (If your Center requires submissions via a travel coordinator, provide the necessary information to your

Center's travel coordinator). In the case of NASA-Sponsored Conferences, also notify your Center Conference Reporting POC that you are inputting a new event; doing so will facilitate NASA-wide coordination regarding its reporting. After you input the information for a new event in the system, the NCTS moderator will send a reply within one working day indicating whether the event is accepted for inclusion in the system and if it is, will supply its identifier and will add the event to the NCTS database. Once you have the NCTS Identifier, follow the steps in 2.a. above.

3. For travel to a foreign conference, submit your travel authorization to your approver at least five weeks before the planned departure date. Show Trip Purpose as "conference." Also either (a) ensure that the Trip Description begins with the NCTS identifier (copy the Conference Identifier from NCTS), or (b) once the upcoming system enhancement is enabled, select the NCTS identifier from the drop-down menu of available function codes.
4. For foreign conferences, after receiving your travel authorization request, your travel approver will input your name into NCTS to include you on the list of NASA employees who want to attend the conference counting toward the 50-person limit. Your travel approver must submit this request at least four weeks before the planned departure date. If NASA attendance at the conference is expected to be small, you will be promptly notified that you are within the 50-person limit. For conferences at which NASA attendance is expected to be larger, you may be placed on a "pending" list while the Office of External Relations, in consultation with appropriate Agency representatives, determines NASA-wide allocations for attendance. If approved, proceed with the established processes of your Center/Office for foreign travel. Note that NCTS approval simply means that you are approved with regard to the 50-person limit; you are still responsible for obtaining your supervisor's separate approval for your attendance at the conference
5. After attending a Reportable Conference, submit you travel expense report as you normally do, including the NCTS identifier on it.