

NASA Advisory Implementing Instruction (NAII) 9770.1

Conference Approval and Reporting Instruction

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Chapter A. Overview and Roles and Responsibilities

A.1. Overview.

A.1.a The purpose of this NASA Advisory Implementing Instruction (NAII) is to provide detailed guidance and instructions on NASA's conference review and approval procedures prior to the event and post-conference reporting of conference cost and other pertinent information.

A.1.b The conference approval and reporting instructions are based on NPR 9770.1, NASA Conference Approval and Reporting and authorities referenced therein including Consolidated Appropriations Act, 2016, and Office of Management and Budget (OMB) Memorandum M-11-35 and M-12-12.

A.2. Roles and responsibilities.

A.1.a Agency Reviewer shall:

- (a) Oversee and coordinate the conference reporting processes.
- (b) Provide clarification and policy guidance to the Center and HQ Office conference POCs concerning conference approval requests, and conference reporting, and assist in determining whether specific events are "conferences" under this policy.
- (c) Oversee the conference approval and reporting processes including overall content of the NCTS System and the NASA Conference Administration Community of Practice section of the OMB MAX website.
- (d) Coordinate the review and approval of NCTS NF 1784, Conference Approval Requests.
- (e) Coordinate the annual posting of NASA's conference reports on NASA's public web site.
- (f) For internal consistency, periodically review the NF 1784's and NF 1785's.

A.1.b Each Center/Office Conference Administration POC shall:

- (a) Assist travelers, travel preparers, event POCs, and other Center/Office Conference Administration POCs and managers to determine whether a given event meets this directive's definition of "conference" (see Chapter 2).
- (b) Ensure that NASA attendees and P-Card users are instructed to use the NCTS Conference Code on travel and charge documents.
- (c) Assist the Agency Reviewer in resolving conference determination questions.
- (d) Act as the POC for local Event POCs concerning the information needed for completion and submission of the estimated cost data, event actuals, as well as other associated report forms into NCTS.

(e) Enter all conference costs incurred at the respective Center/Office as well as attendee request information into NCTS.

(f) Oversee the review and completion of their Center/Office's data and other conference report information.

(g) Ensure NCTS NF 1784s are initiated at least 90 days in advance of the event to the Agency Reviewer if NASA-Sponsored and 60 days if non NASA-sponsored, or if 90 and 60 days advance approval is not practicable, as soon thereafter as possible.

(h) Input his/her Center's actual costs and attendance (NF 1785) for conferences in which his/her Center requested slots and a 1785 is required, including the following:

(1) Final Center/Office attendee count recording who actually attended the event.

(2) Obtaining and attaching Business Objectives reports of all travel and charge card costs associated with the NCTS Conference Code, and for all other costs, maintaining and attaching a copy of all invoices, receipts, purchase orders, task orders, and other financial documents associated with the conference to the conference in NCTS.

(i) Provide other assistance as requested by the Agency Reviewer regarding the Center's/Office's conference-related matters.

(j) Assist with local Center or Office training and awareness efforts pertaining to this directive.

A.1.c NASA Conference Sponsor Organizations.

(a) Each NASA organization that plans to host a conference or provide sponsorship funding for a conference shall appoint an Event POC before making substantive plans and notify the cognizant Center/Office Conference Administration POC of the name of the Event POC.

A.2.b Event POC shall:

(b) Coordinate with the Center/Office Conference POC(s), beginning with the first stages of planning, to ensure they are aware of the event and to obtain their help with policy and conference questions.

(c) Submit required backup information and documentation for assigned conferences receiving NASA sponsorship funding to the Center POC for NCTS submission and:

(1) Ensure the timely preparation.

(2) Substantiate and document the event's cost estimates.

(d) Ensure that NASA attendees and P-Card users are instructed to use the NCTS Conference Code on travel and obligating documents.

(e) Attach a copy of the report and supporting documentation to the respective event in NCTS on behalf of the sponsoring organization in accordance with NPR 1440.6 so that these materials are available upon request to appropriate reviewers.

(f) Provide other assistance as requested by the Conference POC and Agency Reviewer with regard to the conference and its associated forms and reports.

A.2.c Traveler and Travel Preparers shall:

(a) Determine whether the event they are planning to attend is a conference using the definition contained in this directive.

(b) Obtain the NCTS Conference Code if the event meets the definition of a conference, and (1) enter the Conference Code in the function code field, (2) select “conference” as the trip purpose; and (3) enter conference name in the Comments field in their travel authorization.

(c) If there is a registration fee associated with the conference, enter in the travel authorization either (1) when the fee is paid by the traveler, enter the amount under “Other” expenses and under justification enter “Reg. Fee;” or (2) enter in the Comments field, following the conference name, the term “Reg. Fee \$.”

(d) Ensure that the Conference Code is appropriately entered in the function code before finalizing the travel voucher upon completion of the travel; if it is not, amend the travel authorization to use the appropriate Conference Code.

A.2.d Travel Approvers shall:

(a) Ensure there is a valid business need for the traveler to attend the requested conference.

(b) Ensure the traveler has selected “Conference” as the trip purpose in the Agency electronic travel system for all conference-related travel, and entered the Conference Code and additional information required.

(c) Travel Approvers who are also CTO Processors shall register travelers requesting authorization to travel to a conference in NCTS, entering their name and estimated costs, and shall also ensure approval status in NCTS prior to approving travel plans or paying registration fees for all international conferences.

(d) Ensure all non-travel expenses (e.g. conference fees, site rental, booth expenses, copying services) are recorded in the appropriate system with an annotation that includes the NCTS Conference Code.

A.2.e Charge Card Users shall:

(a) Ensure there is a valid business need for the requested charge in connection with the conference.

(b) Ensure the prompt entry of the Conference Code and name line from NCTS in the comments field and the Conference Code in the internal order field of the P-Card order log for each P-Card purchase relating to the conference.

A.2.f CTO (Charge Card and Travel Office) Processors shall:

(a) Ensure the prompt entry in NCTS of estimated conference costs in the appropriate travel and non-travel tables for Travelers, Charge Card and PR users at their Center/Office.

A.2.g Office of International and Interagency Relations (OIIR) shall:

(a) Provide policy guidance regarding international travel and related attendance thresholds.

(b) Review and coordinate conference-related international travel by NASA personnel.

(c) Oversee the process to determine appropriate allocations are made in a timely manner for international conferences involving more than 50 NASA civil servants and 50 contractor employees who seek to attend.

A.2.h AAO shall:

(a) Maintain the NCTS system.

A.2.i The NCTS Approver shall:

(b) Coordinate with the POCs and Agency Reviewer to resolve any requests for conference determination and to update NCTS.

(c) Assist the OCFO in maintaining reporting information received from conference sponsors and providing quarterly summaries to management.

(d) Notify all potential attendees when conferences are added to NCTS.

(e) Monitor weekly conference commitment and obligation report and initiate 1784 workflow the OCFO in the event that the cost for an individual conference reaches \$90,000 and the slot entry deadline has occurred.

Chapter B. Conference Planning

B.1. Cost-Effective NASA-Sponsored Conferences

B.1.a Use of NASA or other Federal Sites.

NASA sponsor organizations shall take reasonable efforts to determine if there is a NASA or other Federal facility available that satisfies the key event objectives.

When considering non-Federal sites, NASA conference planners shall conduct and document a cost comparison for at least three potential non-Federal sites.

Each site cost comparison shall be documented and included as part of the NF-1784. The documentation shall evidence consideration of all the factors described in FTR §301-74.2-74.5 and 74.14, and show at least three quotes from non-Federal facilities. In general, the factors to be considered include:

- (a) Adequacy of lodging rooms at the established per diem rates.
- (b) Overall convenience of the conference location, including consideration of employees' time en route and travel expenses.
- (c) Availability and cost of meeting space, equipment, and supplies.
- (d) Availability and cost for audiovisual and other equipment usage.
- (e) Computer and telephone access fees.
- (f) Printing capabilities and fees.
- (g) Ground transportation availability and fees.

If a NASA conference sponsor organization selects a non-Federal facility as the conference site, the NASA sponsor shall clearly explain on the NF 1784 the reason for this choice, including a brief discussion on their determination about available Federal facilities.

B.1.b Additional Considerations Regarding Cost and Appropriateness.

When planning a conference, NASA sponsors shall review available guidance, including FTR Appendix E to Chapter 301, Suggested Guidance to Conference Planning, and comply with all Government-wide regulations on conference planning set forth in the FTR at, 41 CFR 301-74.

Being mindful of cost considerations, planners shall give precedence first to hold events onsite (including by use of “virtual” video and teleconferencing means linking multiple sites), and second to sites within the proximity of a NASA Center meeting “local” travel requirements for local attendees, whenever such sites would meet the key event objectives and reduce the number of attendees requiring TDY travel and lodging accommodations.

In addition to cost considerations, NASA organizations planning to sponsor an event shall be conscious of appearances in selecting the event site. Planners shall take care to select event

locations that are cost-justified and appropriate to the purpose of the event and that minimize, to the greatest extent possible, any appearance of impropriety.

NASA event sponsor organizations shall also be cognizant of and take steps to minimize the appearance concerns inherent in different forms of entertainment at potential sites, including the availability of golf courses, onsite gambling facilities, etc. Also, collateral activities should not be reflected on the agenda and should be scheduled only during off-duty hours and clarify that they are voluntary and that participants are responsible for their own associated costs.

B.2. Limitations on the Cost of NASA Sponsored or Attended Conferences

B.2.a NASA shall limit the total cost it incurs for an individual conference to the minimum amount necessary to reasonably meet NASA's overall mission requirements for holding the conference. NASA shall also not incur costs in excess of \$500,000 for an individual conference except in compelling circumstances. The total cost of an individual conference includes all sponsorship, exhibit and travel/attendance costs funded by NASA. This limitation applies to both NASA sponsored conferences and conferences sponsored by others.

B.2.b All conference costs shall be identified using the NASA Conference Tracking System (NCTS) Conference Code assigned to the conference.

B.3. NASA Conference Sponsorship

B.3.a Sponsorship Costs. NASA sponsorship of a conference may range from hosting and solely-sponsoring a conference to minor sponsorship support for another entity's conference. NASA is considered a "sponsor" if it funds costs for hosting (e.g., facility rental) or underwriting (e.g., supporting the host of the conference). Examples of sponsorship costs include:

(a) Hosting costs such as conference space rental (excluding exhibit booth rental fees), providing conference space at NASA facilities on a non-reimbursable basis, and facilities services costs incurred for generally supporting all conference sessions, such as audiovisual and information technology services.

(b) Conference planning and support costs, including support services contractor costs.

(c) Sponsorship fees paid by NASA.

B.3.b Exhibition and Presentation Costs. Exhibit and presentation costs are reportable conference costs. Absent an agreement or other sponsorship criteria (such as the costs identified in Section 7.3.1), these do not represent sponsorship costs. However, if the primary sponsor(s) structure it so exhibitors are "sponsors" by agreement and gives more than just booth rental/space to the exhibitor, NASA is considered a sponsor and these costs are treated as sponsorship costs.

B.3.c Attendance Costs. Attendance Costs such as registration fees for civil servants and authorized contractor employees are reportable, but do not represent sponsorship costs.

B.3.d Grants and Cooperative Agreements. Conferences that are independently proposed and sponsored solely by a recipient of NASA financial assistance (i.e., grants and cooperative

agreements) are not considered to be funded using NASA sponsorship. However, to validate and ensure proper compliance and reporting, if the proposed research or project effort and the related budget under a grant or cooperative agreement proposal supports, directly or indirectly, NASA mission needs and objectives related to hosting (or assisting another entity) to host a conference, this proposed use shall be reviewed and approved by the appropriate NASA Office of Procurement and legal office prior to award. As part of this review, the Office of Procurement with the concurrence of the legal office, will issue a determination as to whether a procurement contract should be used as the appropriate instrument in lieu of all or part of the proposed grant or cooperative agreement. This review shall also ensure that all costs for conferences are properly approved and reported pursuant to this NAI. Under no circumstances shall NASA personnel use a grant or cooperative agreement to solicit or direct an existing or prospective grant or cooperative agreement recipient to host a conference for the direct benefit, need, or requirement of NASA.

B.3.d.1 A cooperative agreement can be used to provide funding for a conference. The following conditions must be adhered to:

- a. The funds in a cooperative agreement cannot be used to acquire goods or services for the direct benefit, need, or requirement of NASA.
- b. A cooperative agreement is to be used for financial assistance to a NASA partner.
- c. Funds can be used for technical support for a NASA partner's pre-conference technical review expenses.

d. Technical review expenses include:

- a. Pre-conference travel expenses of technical paper reviewers.
- b. Expenses related to pre-conference technical paper/presentation review.

e. Funds can be used for the following conference expenses relative to a NASA partner's conference:

- a. Programs or brochures related to the conference.
- b. Technical media to distribute papers/presentations electronically such as thumb drive.
- c. Partner's exhibit expenses.

f. Funds for a NASA partner's conference provided through a cooperative agreement cannot be used for:

- a. Sponsorship fees
- b. Audio/visual expenses for the conference
- c. Support contractor
- d. Logistical support such as rental of facilities, speakers' fees, costs of meals and refreshments, local transportation, and other items incidental to hosting such conferences.
- e. NASA Exhibit expenses

B.3.e Primary Sponsor. NASA is considered a “primary sponsor” if it is the sole sponsor of the event or one of the principal cosponsors. In comparing co-sponsors’ costs to determine whether NASA is a primary sponsor versus a minor sponsor, only sponsorship costs, not travel or exhibit costs, shall be considered. NASA is not considered a primary sponsor if its sponsorship contribution is significantly less (e.g., half or less) than the leading co-sponsor or if its relative contribution is minor (e.g., less than 25 percent of the total contributed).

B.3.f Multiple NASA Organizations Co-Sponsoring One Conference. If multiple NASA Offices or Centers fund an event, the Office or Center responsible for the event’s overall planning and sponsorship shall be responsible for determining whether it is a conference, and as applicable, approving the site selection, contracting for facilities and services, and preparing and submitting required approvals and post-conference reports, including the NF 1784 and NF 1785.

B.3.g Hosting Partnerships, Co-Sponsorships, and Coordination. NASA organizations should use, to the greatest extent practicable, existing agreement instruments and procedures when entering into any co-sponsorship, partnership, or other form of coordinated hosting of conference-related activities with other entities. Before the responsible NASA organization may use an alternate agreement instrument, it must obtain prior written concurrence from their local counsel’s office.

Seeking legal concurrence. To request legal concurrence for an alternate agreement instrument, the NASA organization shall provide their local counsel’s office a detailed description of the proposed arrangement, including the parties’ respective responsibilities and financial contributions, and any proposed formal agreement.

Exclusions. This requirement does not apply to work performed under a procurement contract. Also excluded are coordination activities or payments unrelated to sponsorship or hosting (e.g., coordinating session presentations, coordinating/providing speakers, attending meetings, or putting on exhibits). All other requirements for review by local counsel remain and are unaffected by this paragraph.

B.3.h Compensatory and Upgraded Rooms. It is a common practice for hotels to offer various incentives and upgrades to customers holding large events at their facilities for no additional cost. NASA sponsoring organizations may accept such upgrades as part of the overall consideration when renting a facility for a NASA-sponsored conference, but only when the following criteria are met:

Sponsoring organizations or their agent (i.e., a conference support contractor), shall conduct all lodging and facility negotiations so as to minimize total costs when considering proposed incentives or upgrades.

Room upgrades for attendees shall only be accepted when provided at no additional cost (e.g., are a standard offering for convenience of the hotel). Any accepted room upgrades must be assigned to NASA employees based on reverse-seniority (i.e., upgrades will be assigned to the attendee(s) with the most junior grade or position) and shall only be used by employees on official TDY.

Compensatory (Comp’d) rooms or services shall only be used for official governmental purposes.

B.4. Conference Funding and Collection of Fees

B.4.a NASA does not have authority to collect registration fees for conferences or other events it sponsors.

B.4.b NASA shall not supplement its appropriated funding for an event by collecting conference fees, exhibitor fees, attendance fees, or sponsorship fees from other persons or entities.

B.4.c Accordingly, NASA shall not use contractors to accomplish what the Agency is prohibited from doing, in this regard.

(a) Conference planners shall not collect fees to offset the Agency's costs of hosting a conference.

(b) Before retaining a professional conference planner, the Agency shall ascertain that enough appropriated funds are available to pay the contractor's costs.

(c) Even if a Space Act Agreement allows the partner to collect registration fees, doing so may raise other fiscal concerns, such as augmentation of Agency appropriations. In such situations, planners shall receive written concurrence from their local counsel's office before proceeding.

(d) NASA shall not solicit NASA contractors or other non-NASA entities to contribute to NASA events without prior consultation with their local CFO's and counsel's offices.

B.4.d Outside sponsorship does not become allowable simply because there are no or insufficient appropriated funds for an event.

B.4.e Corporate sponsorship may raise appearance or gift issues. NASA event planners shall refrain from making arrangements involving corporate sponsorship until local counsel has fully reviewed and concurred on the sponsorship and associated arrangements.

B.4.f Certain circumstances may afford cost-sharing opportunities or complimentary activities in connection with a NASA conference. For instance, in some cases, NASA and a co-sponsor or organizer may sign a no-cost agreement (e.g., Nonreimbursable Space Act Agreement or no-cost contract) under which each party bears its own costs in connection with their agreed areas of responsibility; in these circumstances the co-sponsor may be able to collect fees to offset its costs and NASA bears no liability for the partner's costs. Similarly, in some cases NASA may choose to limit the scope of its support to certain core aspects needed for the success of its conference (for example, the presentations and meetings); it may be permissible to enter into a full or partial no-cost contract with another entity to provide some complimentary activities (e.g., exhibit halls, meal packages). However, no NASA sponsor organization shall enter into any agreements that would permit acceptance of fees or services, or structure an event to do so, before providing a full description of the circumstances, and proposed agreements, and receiving concurrence from their local CFO's and counsel's office.

B.5. Food at NASA Conferences

B.5.a NASA shall not provide food at its conferences, or otherwise use its direct appropriated funds to pay for food or light refreshments at conferences it is sponsoring. This does not prohibit

individuals from paying directly for food outside of a support contract (see Section 7.4.6). This restriction on food does not apply to non-conference events like training (as narrowly defined under Section 2.2.2) or awards ceremonies that are separate from a conference primarily sponsored by NASA.

B.5.b Widely Attended Gatherings (WAGs). The Agency will no longer issue widely attended gathering (WAG) determinations for events at or held in conjunction with conferences primarily sponsored by NASA.

B.6. Business Supplies and Promotional Items

B.6.a Appropriated funds may be used to purchase appropriate business items for attendees that are necessary for the proper functioning of a conference, such as nametags, notepads, and pens.

B.6.b Promotional materials (branded items, clothing, mementos, toys, bags, etc., also known as “swag”) shall not be distributed except as authorized by Agency Promotional and Personal Use Items policy.

B.6.c NASA may provide NASA employees appropriate recognition, including official awards for performance of their official duties, as determined by their supervisors in accordance with NPR 3451.1, NASA Awards and Recognition Program.

B.6.d Gifts for speakers or guests shall not be purchased using normal appropriations. Official representation funds may be used for presentation items to non-NASA speakers or guests if the requirements of NPD and NPR 9050.1, Official Representation Fund, are met.

B.7. Advertising

B.7.a NASA necessarily uses various methods to publicize an event. In so doing:

.A.a.1 NASA employees shall avoid giving the appearance that the Agency is endorsing an outside entity, such as posting corporate logos on a NASA Web site.

The NASA Insignia (including “the Meatball”), initials, or name may be used only in accordance with Federal law and regulations and with the approval of the Associate Administrator for the NASA Office of Communications.

No NASA employee shall permit an outside entity to use the NASA Insignia without first obtaining permission from the NASA Office of Communications to do so.

B.8. Using Appropriated Funds to Pay Conference Expenses for Non-Federal Participants

B.8.a NASA is prohibited by law from using appropriated funds to pay for the travel, transportation, and/or subsistence of non-Federal attendees at meetings. “Meetings” in this context includes conferences.

Exception: NASA may pay for travel, transportation, and subsistence of persons who meet the definition of “employee” under FTR Section 301-1.2 (for example, invitational travelers and special Government employees) that perform a direct benefit for NASA. In such cases, an official NASA travel authorization shall be required.

In limited cases, NASA may use appropriated funds applied to an active contract to pay for contractor employee attendance, travel, transportation, and/or subsistence fees at a conference. NASA funds shall not be used to pay any expenses for a contractor to attend a conference unless all of the following criteria are met:

- (a) The relevant contract terms and conditions allow the contractor employee(s) to attend the event (e.g., participation is related to their NASA activities or scope of work).
- (b) The contractor employee's role in the conference (e.g., presenter, speaker, etc.) shall provide a direct benefit to NASA.
- (c) The authorized Contracting Officer (CO) or Contracting Officer's Representative (COR) has reviewed and approved all proposed contractor employee attendees and estimated costs.
- (d) The individual contractor employees receive prior approval to attend in NCTS.

B.8.b Post-Conference Reporting. Contractor conference expenses paid with NASA funds shall be reported as NASA conference costs and shall be included in NCTS following the process described in Appendix D of this NAIL. The Senior Conference POC shall determine the contractor conference costs in the following manner:

NASA-Sponsored Conference with Significant Contractor Attendance (30 percent or more, see Appendix D): The Event POC shall contact the CO or COR for each contractor attendee identified in the Final Attendee List to obtain the actual costs incurred. These total costs shall be included in the NCTS NF 1785.

NASA-Sponsored Conference without Significant Contractor Attendance (see Appendix D): The Senior Conference POC shall use the original estimates entered into NCTS to calculate the Agency's total contractor costs. This total estimate shall be included in the NCTS NF 1785.

Non NASA-Sponsored conferences, regardless of the contractor attendance, shall use the estimated contractor costs. This total estimate shall be included in the NCTS NF 1785.

B.9. Pre- and Post-Conference Meetings

B.9.a Conference planning and review meetings shall be held to the minimum required for prudent conference planning.

As part of their planning, NASA conference organizers should review all pertinent information available from venue websites or materials, other NASA organizations, and the support contractor (if applicable) regarding the venues being considered. For example, if the venue has been used for other events supported by the contractor, they may be able to provide pictures, sample agreement materials, etc. NASA conference organizers should make all reasonable efforts to gather the sufficient information necessary to ensure the success of the conference using remote or non-cost options. However, if upon completion of this review, the organizers determine that there are significant remaining questions that can only be answered by an in-person evaluation, a single site or scouting visit may be approved by an OIC.

To the extent practicable, other conference planning meetings should be conducted by teleconference, webex, or similar minimal cost means. An OIC may approve a single planning meeting at either the venue or onsite at a NASA facility when it is determined the size and complexity of the conference planning necessitates an in-person discussion to ensure successful execution of the conference. Any requests for additional planning meetings require both the OIC's approval and a waiver request approved by the Agency OCFO upon a clear showing that more than a single planning meeting is critical to the success of the conference. Only the minimum necessary travel and other costs shall be approved in connection with such planning meetings.

B.9.b No travel costs shall be approved for post-conference reviews or "lessons learned" meetings. Event organizers may conduct such post-event discussions using teleconferences, webex, or similar minimal cost means. This prohibition does not apply to post-conference audits that may be conducted by OIG or Agency-wide conference process and compliance reviews that may be conducted by the Agency OCFO.

B.9.c All costs in connection with approved site selection and planning meetings shall be approved by the Center OIC incurring the expense and attached to the respective conference in NCTS.

Chapter C. Conference Review and Approval

C.1. Preparing and Approving the NF 1784

C.1.a The Conference POC reviewing and approving a conference NCTS number request shall establish a slot entry deadline for all agency conference POCs to adhere to when identifying the number of attendee registration slots needed at a particular Center/Office. This Conference POC shall also establish an attendee registration deadline for attendee names to be entered into NCTS for approving purposes. All Conference Administration POCs shall coordinate with their Centers/Offices to ensure attendee(s) comply with those deadlines to the maximum extent possible.

C.1.b The Conference POC initiating the NF 1784 shall review the NF 1784 information for completeness, reasonableness and accuracy, and be prepared to substantiate the cost estimates and any supporting documentation to the satisfaction of the approving officials. Other Center/Office Conference Reporting and Senior Conference POCs shall assist as needed in the initiation of the NCTS NF 1784.

C.1.c The responsible Center/Office OIC shall approve the NCTS NF 1784 as the approving official for any Reportable Conferences requiring a 1784. Promptly following approval by the OIC, the Agency Reviewer will receive the 1784 for further review and submission.

C.1.d All recommendations for conferences requiring HQ-OCFO approval must include the OIC's justification for NASA spending \$90,000 and above, including a brief explanation how the conference advances NASA's mission. The OIC shall also confirm that conference attendance and expenses are limited to levels required to carry out the mission of the conference, and applicable FTR and FAR provisions were followed.

C.1.e All recommendations for conferences at or exceeding \$500,000 must also include the OIC's justification for why exceptional circumstances exist, such that spending over \$500,000 is warranted as the "most cost-effective option to achieve a compelling purpose," along with a request for waiver by the Administrator, including the NASA strategic goals that will be directly or indirectly addressed through NASA's participation.

C.1.f The Agency Reviewer will coordinate further review and approval by the Deputy Administrator and the Administrator for conferences exceeding \$500,000. Following approval, the NCTS promptly notifies the initiating Center of the approval who shall notify the identified participating Centers and HQ Office Conference POCs, noting any special limitations with the approval.

C.2. Amending an NCTS NF 1784.

C.2.a Because of the importance of early approval for reportable conferences, reasonable changes in planning can be managed without requiring formal re-approval of the planned total costs. However, as soon as conference plans change such that anticipated costs increase more than 10 percent over the total cost of an approved NCTS NF 1784 the NCTS NF 1784 shall be amended and reinitiated to the OIC for approval as an amended NCTS NF 1784. If the revised cost now exceeds a higher approval threshold (i.e., \$100,000 or \$500,000, or any other limit

imposed in a prior approval), the amended NF 1784 shall be submitted for the additional approvals required (e.g., for Deputy Administrator approval if now at or exceeding \$100,000).

If additional attendees or other attendance changes (e.g., speaker substitutions) are identified after the POC's established slot entry deadline, the Conference POC for the new attendee(s) shall take one of the following actions:

(a) The Conference Administration POC may decline another individual within the POC's respective Center/Office that was previously approved to attend the event in NCTS and replace that individual with the new attendee information; resulting in no overall change to the event approved headcount and costs.

(b) The Conference Administration POC may utilize slots included in the unallocated slots identified prior to initiation and approval, if available; resulting in no overall change to the event approved headcount and costs.

(c) The Conference Administration POC may collaborate with the POCs for other Centers/Offices to determine if one of their unused slots can be transferred in NCTS and the POC may then replace that individual with the new attendee information; resulting in no overall change to the event approved headcount and costs.

(d) The responsible Conference Administration POC may collaborate with other Conference Administration POCs to request the addition of new attendee(s) to the NCTS approved count without removing any other currently approved attendees; potentially resulting in increased event costs. In instances where this addition would necessitate submission of a revised NF 1784, the Conference Administration POC for the late addition(s) may then be required to take ownership of the NF 1784 initiation from the current Conference Administration POC.

C.2.b The responsible Conference POC shall promptly notify the Agency Reviewer to coordinate the submission of the amended NCTS NF 1784.

C.2.c Reportable Conferences should be approved by an OIC at least 90 days prior to the date of the conference, and each OIC shall manage their approved conference to stay within approved limits (e.g., no more than 10 percent of the estimated cost per Section 3.3.4). When approving a NASA Sponsored Conference or other Reportable Conference that could have been reasonably expected to need approval (i.e., the event is the next in an annual series of previous Reportable Conferences) less than 90 days before the conference date, the NCTS NF 1784 shall also include a justification for the delay. Similarly, when final costs exceed approved limits, the NCTS NF 1785 shall include detailed justification. In order to help improve timeliness and accuracy throughout the agency, a discussion about the justification, together with lessons learned and recommended approaches to mitigate the causes of the delay or spending above approved limits, may be shared at the Agency Baseline Performance Review.

Preparing Conference Travel Authorizations, Vouchers, and Other Purchases

C.3. Travel Authorizations

C.3.a “Conference” as Trip Purpose.

Persons preparing travel authorizations involving any conference attendance shall select “conference” in the e-travel system Trip Purpose field.

Users (travelers or their preparers) shall select the “conference” purpose only for trips that include events meeting the definition of “conference” in Chapter 2. “Conference” shall be selected, even if that trip includes conference attendance, but has other purposes that are not conference-related.

C.3.b NCTS Conference Code as Function Code. Users shall select the conference’s NCTS Conference Code when preparing travel authorizations by using the drop-down menu in the e-travel system's function code field.

If the conference they are planning to attend is not in the dropdown list the user shall search NCTS for the conference code. If the conference has not been loaded into NCTS, the user will contact their Center/Office Conference Administration POC (or other local procedure published for their Center/Office) and request that the conference be added to NCTS and a Conference Code assigned. The NCTS Approver will review the add request and add the conference to NCTS. The requester will receive an email notification containing the official conference name and NCTS Conference Code when the conference has been approved.

The travel authorization cannot be completed until the proper NCTS Conference Code has been entered in the function code field on the authorization. If the Conference Code was not entered in the traveler's initial authorization, it is the traveler's responsibility to ensure that before creating the voucher an amended authorization is entered replacing the incorrect function code with the correct NCTS Conference Code. This code facilitates accurate, immediate tracking of conference attendee numbers via Business Objectives (BOBJ), as well as cost and attendance reports for preparing NF 1785s, and quarterly and annual conference reports.

C.3.c Attendance Description. In order to facilitate the review and approval process, additional information is required when requesting to attend a conference. This information includes the conference name, the attendee’s position title, the purpose of attendance (i.e., presenter, attendee, display team), and estimated registration fees (if any).

C.3.d Travel Approval. As part of the normal travel approval process, all travel approvers are required to ensure that all conference attendance is identified with the correct trip purpose and function code, so the attendance associated costs of a conference can be retrieved directly from the Agency’s financial system.

C.3.e Travelers shall also ensure that all requests for non-travel charges (e.g. conference fees, site rental, booth expenses, copying services, etc.) are clearly identified as being related to a conference and be accompanied by the NCTS Conference Code so the costs can be recorded in the financial system with the appropriate order field number (Conference Code)

C.3.f NASA Travel Offices Entering Attendee Data into NCTS. The Center/Office CTO Processor(s) shall update NCTS under the Conference Attendees table for the requested conference by adding the traveler's name and all other required attendee information.

In cases where the event has an attendance constraint (e.g., reportable conferences, events restricted by other OCFO guidance, etc.), the travel authorizations shall only be finally approved if the traveler is listed as an "approved" attendee in NCTS. CTOs and travel approvers should coordinate with their Center or Office Conference Administration POC to determine and verify which individual travelers will receive approval in NCTS.

C.3.g Timely Submission. In order to facilitate agency wide planning, all travel to conferences should be submitted and approved well in advance of the conference, preferably at least three months prior. Any person's travel request which has not been approved by two months prior to a Reportable Conference may be considered lower priority than those already approved or pending in NCTS, when attendance is restricted to stay within an approved cost or attendance level.

C.4. Non-Travel Purchases

C.4.a Non-Travel Costs. To ensure that accurate estimates of non-travel costs are tracked in NCTS, and automated reporting can be done from NASA's financial system, persons requesting or incurring non-travel costs connected with a conference shall use the applicable NCTS Conference Code in connection with all non-travel charges. As much as practicable, the transactions should be structured so the NCTS Conference Code can be used in the order field to permit accurate reporting from the financial systems. In order to allow up to date tracking of estimated costs in NCTS, all non-travel transactions (excluding registration fees) shall also be reported as early as practicable, and in no event later than funds obligation, to a Center/Office CTO Processor using a Conference Cost Form (CCF)(see App. C).

P-Card Transactions. Whenever a Government purchase card is used for costs associated with a conference, the transaction shall be promptly recorded using the applicable NCTS Conference Code in the internal order field of the Order Log entry. For all non-registration fee transactions, a CCF for the conference transaction(s) and their associated charges shall be prepared and forwarded at the same time to the Center/Office CTO Processor for entry into NCTS.

SATERN Training Requests. All SATERN external training requests for attendance at a conference shall identify the conference using the NCTS Conference Code and name. When the external training request is processed by NSSC to pay approved registration fees, the Conference Code will be entered in internal order field of the P-Card Order Log entry.

Purchase Requisitions (solely conference costs). When a purchase requisition (PR) is used solely for costs associated with a conference, the PR shall use the applicable NCTS Conference Code in the order field when all PR costs are to be reported as conference costs. A CCF for all conference transaction(s) and their estimated costs shall be prepared and forwarded by the PR originator to the Center/Office CTO Processor for entry into NCTS as soon as the PR is approved.

Purchase Requisitions (non-conference costs included). When a PR is used for a transaction including both conference and non-conference costs, all conference costs shall be separately

tracked by the PR originator or the responsible COTR, and a CCF prepared and forwarded to the Center/Office CTO Processor with the approved amount of conference costs as soon as the PR is approved. If the estimate for conference costs subsequently changes by a significant amount (i.e., the lesser of 10 percent or \$2,000), an amended CCF shall be promptly forwarded to the Center/Office CTO Processor for updating NCTS. A final CCF shall also be prepared and forwarded to the Center/Office CTO Processor when all costs are incurred, and in any event no later than 30 days after the end of the quarter in which the conference occurred. The Center/Office CTO Processor shall ensure all such CCFs showing final costs are also timely forwarded to the Center/Office Conference Administration POC for use in quarterly reporting.

C.4.b Timely Submission. In order to facilitate agency-wide planning, all non-travel costs for conferences should be approved well in advance of the conference. All non-travel costs for Reportable Conferences shall be coordinated with the Event POC prior to conference approval as much as possible, and if later, prior to commitment to ensure the proposed costs are consistent with the conference as currently approved. Registration fees for Reportable Conferences should be paid in time to take advantage of early discounts when available, but only for attendees shown as approved in NCTS. For other conferences, non-travel costs should be processed so they can be entered into NCTS at least two months prior to the conference as much as practicable.

C.5. Conference Expenses

C.5.a Reportable Expenses. The following conference expenses are reportable and must be identified with the appropriate Conference Code:

(a) Travel costs. These include transportation, lodging, per diem, and other travel expenses authorized and paid using NASA's travel system.

(b) Registration fees. These are always tracked as conference costs, and are typically reported as non-travel costs. However, when a registration fee is paid by a traveler and reimbursed under a travel voucher, it will be reported together with other travel costs.

(c) Non-travel costs. These include all other costs, including registration fees paid other than through the travel system, costs of developing conference materials, such as handouts, exhibit costs, and all other costs associated with supporting or sponsoring a conference, such as facility rental, sponsorship fees and support service contractor costs.

C.5.b Non-Reportable Expenses. The following expenses are not reportable as conference expenses:

(a) Pay and Benefits. Civil Service Employee Salaries and contractor labor are generally excluded, in view of system limitations and the expense of such reporting. An exception is for conference support service contractors; all their costs shall be reported, including labor and burden, in connection with support contractor services for NASA sponsored conferences.

(b) Conference costs paid by a recipient of financial assistance (i.e., using grant or cooperative agreement funds from NASA). To ensure proper use, cooperative agreements should limit the use of funds for conference activities directed at a public

purpose like technical assistance to presenters. To the extent a proposed grant or cooperative agreement also supports NASA mission needs and objectives related to hosting or assisting another to host a conference, the proposed use shall be reviewed with procurement and legal to determine whether a procurement contract should be used in lieu of all or part of the proposed grant or cooperative agreement.

C.5.c Other Information on Reportable Costs. The frequently asked questions (FAQs) in Appendix A, of this directive provides further information on conference reporting requirements.

Chapter D. International Conference Attendance

D.1. General

D.1.a The requirements of this NAII do not replace, but are in addition to, other Agency or Center international travel approval requirements.

D.1.b Attendance Limit. In recent years, NASA's annual Appropriations Acts, most recently the Consolidated and Further Continuing Appropriations Act, 2012, have stated that no more than 50 NASA employees may be funded to attend a conference held outside the U.S. This limitation includes employees whose travel is fully reimbursable.

NASA applies this limitation to 50 civil servants and 50 contractor employees for a total of 100 when traveling on NASA appropriated funds. This limitation does not apply when contractors are using funds that are not appropriated to NASA. In addition, international conference travel funded through a cooperative agreement or a grant are exempted from this limitation.

D.2. Definition of Domestic and International Conference

D.2.a United States. "United States," as defined in the Federal Travel Regulations (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 U.S. (excluding the Trust Territories of the Pacific Islands). (See FTR § 300-3.1)

D.2.b NASA Facilities outside the U.S. For purposes of this attendance limit, an event that would normally not be considered a "conference" because it is held entirely at a NASA facility shall be considered an "international conference" if the facility is outside the U.S., provided all other elements of the "conference" definition are met.

D.2.c Non-Program Travel. International conferences are "non-program" international travel. (See Appendix A.) If a trip combines travel to an international conference with other purposes, the procedures for "non-program" travel shall be followed.

D.2.d International Conference POCs.

All international travel and international conference POCs shall be identified to OIIR.

D.2.e NCTS and International Conferences. NCTS is an automated Web-based system that assigns each international conference a unique Conference Code to facilitate cost and attendance tracking. NCTS also enables international conference travel approvers to register the name of a prospective attendee. For conferences for which a larger NASA attendance appears likely, once the 50 person threshold has been reached for either employee type (civil servant or contractor), the Approver shall coordinate with OIIR to obtain approved Center/Office allocations, never exceeding 50 total for each employee type.

D.3. Process

D.3.a NCTS Conference Code. All persons preparing travel documents for international conference attendance shall include the NCTS Conference Code on all associated travel documents, and all approvers should only approve travel authorizations that include the NCTS Conference Code and other required information.

D.3.b Travel Approvers. In the case of travel to international conferences, travel authorizations shall only be finally approved if the traveler is listed as an “approved” attendee in NCTS. This helps insure that NASA remains within the threshold of 100 employee attendees, 50 civil servants and 50 contractor employees to any one international conference.

The Center Travel Office (or other final approver, for Centers without a Travel Office) shall ensure entry of the traveler’s name into NCTS and wait until the international conference travel approval is shown in NCTS before approving the travel. The approver shall work with the CTO Processor to ensure prompt entry into NCTS’ attendee information.

Whenever international travel requests exceed the automatic approval threshold or total costs exceed \$90,000 less than 50 employees, OIIR shall facilitate the final approval process and may, at its discretion, be the approving office for any NF 1784. OIIR, the Center International Travel Coordinators, together with Senior POCs as needed, shall work together to facilitate prompt decisions confirming which travelers are approved to attend. OIIR shall work together with the Center International Travel Coordinators to oversee NCTS entries and insure NCTS is timely updated with any change in attendee approval status. When attendee approval status is changed, the Center International Travel Coordinators and Center Travel Offices shall work together to make any timely changes in travel authorizations (e.g., from pending to approved, or approved to denied status) and promptly notify the traveler of the same.

D.3.c OICs and International Travel Coordinators shall ensure that:

- (a) International travel authorizations are submitted at least eight weeks before the planned departure date.
- (b) International travel reports are submitted weekly to OIIR.
- (c) The NCTS is used consistently.

D.3.d Center or Office International Travel Procedures. Once approved in NCTS, travel authorizations associated with international conferences shall be processed for approval in accordance with other established Center or HQ procedures for international travel.

D.3.e Supervisor Approval Required. NCTS approval pertains only to the 100-person limit; it in no way removes the need for travelers to secure their supervisor’s approval to attend a given conference nor supersedes a supervisor’s disapproval of a request to attend a given conference.

D.3.f Any traveler who attends, or any travel approver who approves a travel request for an international conference without first getting official approval through NCTS, may be responsible for committing an Anti-Deficiency Act (ADA) violation if more than 50 NASA employees attend the conference.

Chapter E. The NASA Conference Tracking System (NCTS).

E.1. Overview

E.1.a Purpose. NCTS is an automated Web-based system that facilitates cost reporting for NASA-funded conference expenses and tracking of Agency-wide attendance. Tracking estimated total cost is required in order for NASA to comply with its new conference approval requirements and cost limitations from OMB. The attendance tracking is required for international conferences to ensure that NASA does not exceed the congressionally established ceiling of 50 NASA civil servants and 50 NASA contractor employee attendees at any one international conference. Also, domestic conference attendance tracking supports NASA's policy of limiting conference attendance to the minimum number of attendees required to accomplish its various missions.

E.1.b Usage. NCTS assigns a unique identification (Conference Code/name) to each NASA-sponsored conference, as well as each non-NASA sponsored conference attended by at least one NASA employee.

E.2. NCTS Roles and Responsibilities for Conferences

E.2.a Reportable Conferences. A Conference POC shall be designated for each Reportable Conference. The Conference POC will assist the approving OIC in reviewing the required NCTS NF 1784 and NF 1785 for the conference, as well as ensuring the conference is maintained within approved attendance and cost levels. The Conference POC of any NASA organization proposing to provide conference sponsorship funding shall assist the Event POC in coordinating with other Centers/Offices in obtaining necessary input from other Centers/Offices in planning for a Reportable Conference and timely preparation of an NCTS NF 1784. The Conference Administration POCs and CTO/Processors shall assist the Event POC as needed, including but not limited to, keeping NCTS attendance and other cost data up to date.

E.2.b NCTS Approver. Upon receiving a request for a new conference, the NCTS Approver shall:

(a) Confirm the request is proper, complete, and not a duplicate event already entered into NCTS and approve the issuance of the NCTS Conference Code.

(b) Notify the prospective attendees of the conference's NCTS Conference Code.

E.2.c Entry of a new conference into NCTS. If a prospective attendee thinks that an event may be a conference as defined in Chapter 2 of the NASA Procedural Requirement 9700, the prospective attendee (or their travel preparer) shall search NCTS for the conference.

If the conference is in NCTS, the prospective attendee (or their travel preparer) shall include its NCTS Conference Code on the travel authorization. Any travel authorization processed without the NCTS Conference Code must be amended to include it prior to submitting the travel voucher.

If the event is not in NCTS, the prospective attendee (or their travel preparer) shall notify the Center/Office Conference Administration POC (listing can be found at <https://community.max.gov/display/NASA/NASA+CFO+Conference+Administration+Com>

munity). The Center/Office Conference Administration POC may request that the traveler prepare a NASA Conference Determination Form if it is unclear whether the event is a reportable conference. Check your local Center/Office guidance for NCTS Conference Determination procedures.

E.2.d Center/Office Conference Reporting POCs. Upon receiving notification that an event that may be a conference has not been entered into NCTS, Center or Office Conference POCs shall determine whether the event is a conference and if it is, request entry in NCTS. In the case of a potentially Reportable Conference not yet in NCTS, the POC shall attempt to identify which NASA Center/Office is most likely the lead for the event (i.e., most likely sponsor) as follows:

If the sponsoring Center/Office is the Conference Administration POC's own Center or Office, the Conference Administration POC shall ensure the sponsor organization timely prepares and submits a NF 1784 as required.

If the Center/Office Conference Administration POC believes that the conference is being sponsored by an organization within a Center/Office other than his or her own, the Center/Office Conference Administration POC shall notify the sponsoring organization's Center/Office Conference Administration POC for further processing.

E.2.e Conference Determinations. Prospective attendees of conferences and NASA organizations sponsoring events can usually determine, without assistance, whether an event is a conference per the criteria in this directive. However, in instances where it is unclear whether an event is a conference or not, users or their preparers or supervisors shall fill out and send to their Center Conference Administration POC a Conference Determination Request Form (CDRF). The list of POCs and the CDRF are available at <https://community.max.gov/display/NASA/NASA+CFO+Conference+Administration+Community>. Where there is a disagreement between Conference Administration POCs about whether an event is a conference, a CDRF may be submitted to the Agency Reviewer who shall assist in making the final determination.

E.2.f Local Procedures. Most Centers have additional local procedures relating to conference approval. Prospective attendees shall follow their local Center process. General agency procedures are described at the Conference Resource Web site, <https://community.max.gov/display/NASA/NASA+CFO+Conference+Administration+Community>; Center-specific procedures are available from Center international travel coordinators and Center Conference Administration POCs.

Chapter F. Post Conference Reporting

F.1. Post-Conference Reports (Including the NF 1785)

F.1.a Purpose. Post-conference information is collected in NCTS and reported on NCTS NF 1785, Conference Expense Report. The NCTS NF 1785 is the key summary document used to identify and summarize the costs of an individual conference. The NCTS NF 1785 form outlines the event actuals and final attendee count information Senior POCs input in NCTS for the overall conference and is approved by the approving official as described below. It is not the entire report, but rather summarizes estimates developed in other parts of the report. All supporting documentation to justify costs shall be attached to the respective event in NCTS.

F.1.b Required Use. A Conference Expense Report, NCTS NF 1785 is required whenever an NCTS NF 1784 is required. The NCTS will display an alert for conferences with approved NCTS NF1784s that require an approved NCTS NF 1785 following the end date of an approved conference.

F.1.c Approving Official. The Center Director or OIC of the HQ office, who incurred the highest costs, shall review the NCTS NF 1785 and the required supporting documentation and when satisfied with its accuracy and completeness, approve the NCTS NF 1785.

F.1.d Forms and Instructions. Detailed instructions, samples, and templates (where practicable) for the Post-Conference Report, including the NCTS NF 1785 and other required displays, are available at <https://ncts.nasa.gov>

F.1.e Post-Conference Reports (including NCTS NF 1785s) of previous conferences are available at <https://ncts.nasa.gov>

F.1.f Submitting the Post-Conference Report. The final post-conference report shall be approved in NCTS no later than 45 days after the end of the event.

F.2. Report of NASA Sponsored conferences to the NASA OIG

F.2.a The Consolidated Appropriations Act, 2016, Div. B sec. 535, requires that NASA provide information to NASA's OIG for NASA-Sponsored Conferences costing more than \$20,000 within 15 days after the conclusion of the event. These reports shall include the date, location, and number of employees attending such conference. This information will be provided using estimated data in the NCTS NF 1784.

F.3. Annual Report of NASA Sponsored conferences to the NASA OIG

F.3.a The Consolidated Appropriations Act, 2016, also requires NASA to submit an annual report to the OIG regarding the costs and contracting procedures related to each NASA-sponsored conference where the cost was more than \$100,000. The annual OIG report shall include the following:

- (a) Description of its purpose.
- (b) Number of participants attending.

(c) Detailed statement of the costs to the United States Government, including:

- (1) The cost of any food or beverages.
- (2) The cost of any audio-visual services.
- (3) The cost of employee or contractor travel to and from the conference.
- (4) A discussion of the methodology used to determine which costs relate to the conference.

(d) Description of the contracting procedures used including whether contracts were awarded on a competitive basis; and a discussion of any cost comparison conducted in evaluating potential support contractors for the conference.

F.4. Annual Posting of NASA Conference Expenditures

F.4.a In accordance with OMB Memorandum M-12-12 and P.L. 113-6, the NASA Agency Reviewer shall coordinate the approval and posting by January 31 on NASA's public web site of the following information concerning NASA's conference expenditures for the prior fiscal year:

(a) Identification of each conference with total NASA costs in excess of \$100,000, using the approved NF 1784s and NF 1785s, including:

- (1) Total conference expenses incurred by the agency for the conference.
- (2) The location and date of the conference.
- (3) A brief explanation how the conference advanced the mission of the agency.
- (4) The total number of individuals whose travel or other conference expenses were paid by NASA.

(b) The NASA Administrator's waiver, identifying the exceptional circumstances that necessitated exceeding \$500,000, for any conferences that exceeded that threshold.

(c) Information about NASA's net conference expenses for the fiscal year, as well as a general report about conference activities throughout the year.

Chapter G. Records Management

G.1. Records Retention

G.1.a NCTS. NCTS. The NCTS shall maintain searchable electronic records (e.g., PDFs) of all approved NF 1784s and NF 1785s along with supporting documentation.

Appendix A. Frequently Asked Questions (FAQ)

A.1. The following FAQs provide more detailed guidance for determining whether an event is a conference and whether a conference is NASA-sponsored or international and must, therefore, be entered into NCTS.

1. Conference Definition (Section 2.1.): Is the event a “meeting, retreat, seminar, symposium, or event that involves attendee travel?”

FAQ 1-1 (Name includes “conference”). For reporting purposes, should events whose name includes the word “conference” always be assumed to be conferences?

Answer: Generally yes, and absent information to the contrary, events called a conference, seminar or symposium should be presumed to meet the criteria for “conference.” But titles can be misdescriptive, and the nature of the event, including its purpose, subject matter, and presence of attendee travel, can be used in determining whether it is a “conference” notwithstanding what its organizers called it.

FAQ 1-2 (Local Travel). Does a workshop that just requires local travel by employees meet the definition of a conference?

Answer: Generally yes. Some “attendee travel” is required for a meeting to be considered a conference, and OMB has interpreted this to include local travel. Thus, the definition only requires one attendee to be in official travel status or have reimbursable local travel. However, where the travel by attendees to a meeting is de minimis (e.g., walking distance offsite) or commuting to assigned alternative duty stations, the meeting is not considered a “conference.”

2. Exclusions - Events that are not a “conference” (Section 2.2).

FAQ 2-1. The FTR definition of “conference” seems very broad—are there any exclusions or types of events that are not considered “conferences” for reporting purposes?

Answer: Yes, those events that are specifically excluded in Section 2.2.1 through 2.2.3 are not considered “conferences.” But there are special cases where the general exclusion may not apply and the meeting or event is reported as a conference; these special cases include certain larger offsite meetings and onsite events open to external participants (see FAQs 3.1–3.4 and Section 2.2.1.3).

FAQ 2-2 (Operational Meetings). Are “operational meetings” always excluded from being a conference?

Answer: No. Formal operational meetings (i.e., required under an NPR or NPD) are always excluded. Other operational meetings are generally excluded, but there are special cases where this exclusion may not apply and the meeting or event is reportable as a conference under NASA policy (e.g., certain larger offsite meetings and onsite events open to external participants; see Section 2.2.1.3 and FAQs 3.1–3.4).

FAQ 2-3 (Management/Governance meetings). Are governance meetings excluded from being considered conferences?

Answer: Generally, yes. Agency governance meetings required under NPD 1000.3 are excluded; examples include the NASA Advisory Council (NAC) and the Program Management Council (PMC). Most other governance meetings are excluded, since they are held onsite and, to the extent external parties participate, are invitational only. However, a larger governance meeting, such as an

organizational strategy meeting held offsite, may be reportable if held at a hotel with 30 or more attendees (see Section 2.2.1.3.b).

FAQ 2-4 (Program-specific events versus operational meetings). Is an event whose purpose is discussion of a specific program considered a conference?

Answer: It depends. Under prior policies NASA recognized a distinction between program-specific meetings and those of a more general nature when determining what was “reportable” as a conference. This distinction was based in part on criteria from Congress and GAO’s criteria for a “formal conference.” Under the FTR definition that NASA is now required to use, the definition for “conference” is broader than these other definitions, so the “programmatically” nature of an event is no longer sufficient as a criteria by itself. However, the FTR does distinguish between travel to conferences and travel to operational meetings.

In order to minimize ambiguity and confusion and facilitate efficient reporting, NASA has adopted two reasonable bright-line rules for distinguishing “operational meetings” from conference meetings. First, meetings that are formally required by NPD 1000.3, or by NPRs mandating program and project management requirements, are always considered “operational meetings” and not “conferences.” Second, other governance or programmatic meetings are generally excluded in view of their operational content. However, to the extent they are held in one of the two settings that are commonly viewed as conference meetings, those meetings will be tracked as “conferences” notwithstanding the fact they may be predominantly “operational” meetings. These two settings are (a) onsite meetings where open to external participants (see FAQs 3.1-3.3) and (b) offsite meetings at a rented facility with 30 or more attendees (see FAQ 3.4).

FAQ 2-5 (Internal organizational meetings). Is my team’s offsite meeting considered a conference?

Answer: It depends. Most such events usually qualify as “other operational meetings” due to the nature of both the attendees and the subject matter. Onsite meetings are almost always excluded, since they do not have open participation and often involve no travel. The presence of an invited outside facilitator or speaker does not turn an onsite meeting into a conference. On the other hand, an offsite meeting that satisfies the criteria of Section 2.2.1.3.b (i.e., 30 or more attendees at a rented facility) will be reported as a conference.

FAQ 2-6 (JPL and other NASA contractors). If JPL or other NASA contractor employees attend an event, can it still qualify as a NASA Operational Meeting?

Answer: Yes. The presence of NASA contractors at events where the subject matter focuses on NASA programs or operations does not in itself cause the event to become a conference. All of the other criteria must be considered. If all invited attendees are either NASA civil service employees or NASA contractors and the subject matter focuses on NASA programs or operations that the contractors are supporting, then an event is not a conference unless it meets the criteria of Section 2.2.1.3.b (i.e., 30 or more attendees at a rented facility).

FAQ 2-7 (Training). Are training events considered conferences?

Answer:

It depends. Training is not considered a conference if it involves “classroom training, on-the-job training, technology-based training, satellite training, coaching, mentoring, career development counseling, details, rotational assignments,” and other single topic meetings (e.g., lunch and learn gatherings). Thus, an established course or set of courses in a classroom setting is not considered a

conference, nor does holding such a course at a rented facility, (e.g., if attendance exceeds planned limits, necessitating rental of a local facility) make it a conference. Similarly, attendance at a university or professional school is not considered a conference.

However, a widely attended event featuring a variety of topical meetings held at a hotel or other conference facility is typically a conference, even if some or all of its content can be seen as educational. It does not matter that a participant's only reason to attend a meeting is to update training in a specific area or maintain a certification.

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, American Institute of Aeronautics and Astronautics' (AIAA) Annual Conference on Small Satellites, the Institute of Electrical and Electronics Engineers (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). Examples of events not considered a conference include a semester-long university course and a two-week professional school class. Remember to apply the other criteria for determining whether an event is a conference, such as whether travel is involved.

FAQ 2-8 (Outreach events). Is there a general exclusion for outreach events?

Answer:

Outreach events sponsored by NASA are considered "other operational meetings." As such, they are typically excluded unless the Special Cases of Section 2.2.1.3 apply. Note that certain onsite outreach events are never considered conferences, including news events, such as press conferences and launch viewings, coordinated by the Office of Communications to announce research results, mission milestones, annual budget releases, and the like to Congress or the media.

In general, outreach events in which the Agency has announced discussions with any interested participant about the status of programs generally, future direction of the Agency and programs, and potential opportunities for collaboration, are conferences under the Special Cases. But onsite events are intended for limited audiences, such as industry day meetings required to inform potential contractors about how to participate in specific upcoming procurement opportunities, are not considered "open participation," so are not reported as conferences.

Outreach at another agency's event is analyzed based on the nature of the event, from the perspective of the other agency, not the nature of NASA's participation (e.g., outreach). For federal agencies subject to OMB M-12-12, NASA will adopt the host agency's determination of whether the event is a conference.

FAQ 2-9 (Speakers, presenters, or judges). If a NASA employee serves as a speaker (including via the speakers' bureau), presenter, or judge at a non-NASA event, does that constitute conference attendance?

Answer: It depends. It is the nature of the event, not the purpose for the appearances (e.g., outreach or dissemination) that is determinative. Many presentations are at classroom training settings (e.g., local schools), awards ceremonies, and festivals or state fairs; none of these by themselves would be considered conferences. But a speaker at a STEM event or recruiting exhibitor would still report costs if the event they are attending is a conference.

FAQ 2-10 (Awards ceremonies). Are award ceremonies considered to be conferences?

Answer: Generally, no. Most awards ceremonies are considered to be Other Operational Meetings because they are programmatic or institutional events taking place as part of routine NASA business, which includes recognizing employee performance. However, award ceremonies that have the characteristics of events described in Section 2.2.1.3, Special Cases, are reported as conferences. For example, if NASA hosts an award ceremony at an offsite rented facility with more than 30 attendees, it would be reported as a conference.

FAQ 2-11 (Exhibits at shows). Are exhibits at air and trade shows (such as Joint Services Open House, Oshkosh Airventure, and the Paris Air Show), county fairs, and open houses reported as a conference cost?

Answer: It depends on the nature of the event. Gatherings where the exhibits or activity booths are the purpose for attendance—such as county or job fairs, air shows and the like, are not generally considered conferences, notwithstanding the large number of attendees at the event. However, if such an event is structured to include a conference integral to the event (e.g., with a substantive agenda, discussions on topical matters, multi-entity participation, particularly where a registration fee is charged), all exhibit and attendance costs should be reported as conference costs.

FAQ 2-12 (Recruiting events). Are recruiting events included as reportable conferences?

Answer: Generally not. NASA-specific recruiting events are usually considered an operational meeting, while general recruiting events hosted by others such as job fairs are not typically structured as conferences. However, as with training, to the extent recruiting takes place at a conference, costs for exhibits and attendance are still tracked as conference costs.

3. Special Cases—operational meetings at a setting reported as “conferences” (Section 2.2.1.3):

FAQ 3-1 (Onsite meetings). Does holding all of the event sessions on a NASA facility automatically exempt the event from being a conference?

Answer: No. Under OMB’s guidance, an event held onsite at a NASA facility might still qualify as a conference. Most onsite meetings are “operational” in nature, so are generally excluded. However, onsite meetings that are open to external participants are not excluded, to the extent they otherwise meet the criteria for “conference” (e.g., involve attendee travel).

FAQ 3-2 (Limited participation). If all participants have to be badged to get onsite, can there still be “open participation”?

Answer: Yes. If the invitation was publicly issued and generally open to anyone responding (e.g., all interested scientists in the topic), it is considered “open participation” notwithstanding special requirements like advanced registration for badging or restricting attendance due to facility size limits. On the other hand, invitation-only operational meetings to cooperate on a specific program, project, or team or to hold recognition events are not “open;” examples include interagency working groups with attendance limited to other agency designees meetings to collaborate on a mission with selectively invited scientists and engineers, and most on-site award ceremonies.

FAQ 3-3 (Communications events open to the public). If an onsite event is open to anyone, is it always considered “open participation” and thus a conference?

Answer: No. News events are generally open to the general public, yet the nature of most is narrowly focused and structured primarily to have a one-way presentation of information to the

audience, thus not what most would consider a “conference.” Thus, news events such as press conferences and launch viewings, coordinated by the Office of Communications to announce research results, mission milestones, annual budget releases and the like to the media and others are not considered conferences.

FAQ 3-4 (Offsite meetings). Does holding an operational meeting offsite of a NASA facility make it a conference?

Answer: It depends: (1) Formal operational meetings (Sec. 2.2.1.1) are never considered “conferences,” even if the size requires it to be held at an offsite rented facility. (2) Other operational meetings primarily hosted or sponsored by NASA are only considered conferences when held at a rented facility selected as large enough to accommodate 30 or more attendees; meetings at contractor or partner facility are excluded when focused on work being performed with NASA. (3) For operational meetings primarily hosted by another Federal agency, NASA will adopt that agency’s determination on whether the event is a conference.

4. Sponsorship

FAQ 4-1 (Nature of NASA support). If NASA pays for an exhibit booth or provides funding in support of a conference, is the conference considered “held by” NASA—i.e., is NASA a “sponsor”? What if the event is paid for partly by NASA grant or cooperative agreement funds, or uses a NASA logo?

Answer:

Attendance costs (travel and registrations), support costs for speakers (paper fees or presentation costs), and exhibit costs are not considered sponsorship costs. Similarly excluded from sponsorship costs are the non-reportable expenses listed in Section 4.3.2, such as conference costs when properly paid by a recipient of NASA financial assistance using grant or cooperative agreement funding.

For NASA to be considered a sponsor, NASA funds must be used to host the conference, such as paying for facility or event support (audio visual or networking) costs. NASA is typically considered a sponsor of conferences held at a NASA facility, unless the event organizer hosts the conference under a fully reimbursable agreement.

Finally, use of NASA’s logo at a conference is not presumed to mean that NASA is a sponsor of the conference; there are other circumstances under which NASA’s logo may be legitimately used without creating a sponsorship (See 14 CFR Part 1221). However, NASA is considered a sponsor where an agreement with the event organizer states that NASA is a sponsor, even if the funding under the agreement is predominantly for non-sponsorship purposes (e.g., exhibit space).

FAQ 4-2 (Primary sponsor). When is NASA the “primary” sponsor for quarterly reporting purposes?

Answer: The question of whether NASA is a primary sponsor depends on how NASA’s sponsorship contribution compares to that of other sponsors. For example, NASA is not considered a primary sponsor if its sponsorship contribution is significantly less (e.g., half or less) than the leading sponsors or, even if contributing the second-highest funding of any co-sponsor, its relative contribution is minor (e.g., less than 25 percent of the total contributed). NASA is only a primary sponsor if it is the conference's only sponsor, including events hosted onsite, or one of the conference’s principal contributors.

FAQ 4-3 (Legal review of partnership agreements). If NASA enters a no-cost agreement with another organization to host or co-sponsor an event and each partner is fully responsible for its own costs and portions of the event, must a legal review still be performed?

Answer: Yes. There are many restrictions on how NASA can participate in conferences that outside organizations do not face; particularly in regard to the collection of registration fees and sponsorship fees (see Section 7.4). Partnership and co-sponsorship agreements, even no-cost agreements, create risks that the partnership may inadvertently violate, or create the appearance of a violation, of one or more of these restrictions.

The NASA organization should follow the normal processes for having each formal legal instrument reviewed (including CFO and legal review). Additionally, if the NASA organization proposes to use an alternate agreement instrument, it must first obtain prior written concurrence from their local counsel's office (see Section 7.3.7). Moreover, the NASA organization must also obtain prior written concurrence from their local CFO and counsel's office before they can enter into a no-cost agreement contemplating the collection of fees or services

FAQ 4-4 (Roles of partners and co-sponsors). What kinds of roles may a partner/co-sponsor of a NASA conference play in the planning and execution of the event?

Answer:

It is usually appropriate for a partner/co-sponsor to perform activities such as identifying panel members and guest speakers; providing audiovisual support; contributing to the costs for signage and other attendee materials; and hosting the event website.

In most cases, it is not appropriate for a partner/co-sponsor to have a role in selecting or directing a NASA conference support contractor; final selection of the event facility; directing the use of any NASA resources or personnel.

In some limited cases, it may be permissible for a partner/co-sponsor to collect registration and sponsorship fees to cover its own costs (see Section 7.4.6). However, it is generally not appropriate for NASA or its partner/co-sponsor to use any registration or sponsorship fees collected to offset any of NASA's costs.

5. What costs should be reported?

FAQ 5-1 (Grants and cooperative agreements). Should the conference-related costs of recipients of NASA grants and cooperative agreements be reported?

Answer: Grants and cooperative agreements are generally excluded from consideration for conference approval and, reporting purposes since the principal purpose of the relationship and the related costs are to carry out a public purpose of support or stimulation (e.g., technical assistance to presenters or the attendance of students at scientific conferences). However, to validate and ensure proper compliance and reporting, if the proposed research or project effort and the related budget under a grant or cooperative agreement proposal supports, directly or indirectly, NASA mission needs and objectives related to hosting (or assisting another entity) to host a conference, this proposed use shall be reviewed and approved by the appropriate NASA Office of Procurement and legal office prior to award. As part of this review, Office of Procurement, with the concurrence of the legal office, will issue a determination as to whether a procurement contract should be used as the appropriate instrument in lieu of all or part of the proposed grant or cooperative agreement. This

review shall also ensure that all costs for conferences are properly approved and reported pursuant to this NID.

FAQ 5-2 (Non-NASA costs). Should NASA-sponsored conference costs incurred by other Federal agencies be reported?

Answer: No. Do not report costs of a NASA-sponsored conference that another Government agency ultimately paid. For example, if NASA incurred conference costs but charged them back to another agency via a reimbursable agreement, do not report those costs, since they are not actually NASA costs. Only report those net realized costs shown by NASA's records. For example, do not report fully reimbursable conference travel arrangements; do report the unreimbursed portion of partially reimbursable arrangements.

FAQ 5-3 (Costs—estimates versus disbursements). For conference travel costs, should one report the recorded or estimated cost or the actual amount disbursed?

Answer: When submitting the NF 1784, report the estimated cost. When submitting the NF 1785, report the amount shown in Business Objects reports. If disbursements are available, use them. However, since typically reports are required soon after the conference ends, 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 reporting using costs or obligations since full amounts of disbursements are not yet available.

FAQ 5-4 (Contractor costs). Should NASA contractors' costs of participating in conferences be reported?

Answer: Yes, if the costs were directly charged to NASA. All costs of conference support contractors supporting NASA-sponsored conferences are reportable. In addition, either estimated or actual contractor employee attendance costs for both NASA-sponsored and non-sponsored events are reportable as described in Section 7.8. and Appendix D.3. For purposes of this guidance, JPL employees are considered contractor employees.

Costs originally paid by the contractor or his/her company and then charged to NASA for reimbursement through an invoice are considered NASA costs.

Note that this requirement does not apply to NASA contractor employees that attend the conference with no costs to NASA. For example, a NASA contractor that attends a conference using personal funds or costs charged against the company's overhead with no request to NASA for reimbursement should not be entered into NCTS or the NF 1785 and his/her attendance costs should not be reported as NASA conference costs.

FAQ 5-5 (Conference support contractor costs). When reporting costs of NASA-sponsored conferences, should all costs connected with the event's conference support contracts or work orders be included, such as award fees and burden or other indirect charges?

Answer: Yes. If a contractor is helping the NASA sponsor organization plan and/or run the conference under a specific work order, task order, or other contract vehicle and is not simply present at the event as an attendee, the contractor's total conference-related costs are reportable.

FAQ 5-6 (Significant Contractor Attendance). What level constitutes "Significant Contractor Attendance" at a NASA-sponsored conference?

Answer: A NASA-sponsored conference is determined to have significant contractor attendance if at least 30 percent of the attendees on the Final Attendee List are contractors whose attendance costs were paid directly by NASA. For purposes of this guidance, JPL employees are considered contractors.

FAQ 5-7 (Conference planning costs). What kinds of costs are acceptable for pre-conference planning meetings?

Answer:

Event organizers should minimize pre-conference planning costs as much as possible. Examples of acceptable costs for pre-conference planning meetings are travel, subsistence costs (e.g., per diem), facility dry run fees (for particularly complex events), etc.

Event organizers should use telecommunications and other no-cost methods to the maximum extent possible in preference to in-person meetings that require travel. In cases where event organizers feel that an in-person meeting is necessary in order to effectively achieve a needed event activity or decision, the OIC of the NASA sponsoring organization, and the Agency OCFO if more than one such meeting has been requested, must approve the trip and all related costs. These costs must be included and reported in the total event costs.

FAQ 5-8 (Site selection trips). What are examples of acceptable site selection trips?

Answer: No site selection trips should be performed unless the event organizers determine that an in-person assessment is essential for accurately evaluating the facility. For example, if the event organizers have previously used the site for another similar event, a site selection trip is not necessary and will not be approved. In addition, event organizers should minimize the number of attendees involved in any site selection trips to only those individuals most needed to effectively evaluate the site. In most cases, the full-planning team presence is not required.

FAQ 5-9 (Conference walk-throughs and dry runs). Are pre-conference site walk-throughs or dry runs allowable?

Answer:

Yes, with the proper approvals. A conference “dry run” is when the event organizers review the facility and schedule on-site with the venue personnel (generally 1-3 months prior to the event) to verify that all logistics will be prepared in accordance with the agreement. Conference dry runs are considered optional conference planning meetings. These dry runs should only be conducted for particularly complex or large events and are subject to the OIC and OCFO approvals described in Section 7.9.

A facility walk-through is performed directly (generally no more than 1-2 days) before the event start date to verify that everything at the facility is ready. These walk-throughs are considered part of event execution, not as separate conference planning meetings. Any associated costs must be included in the total reported event costs; however, OIC approvals for these walk-throughs are not required.

6. Is the conference an “international conference?”

Note: Congress has prohibited NASA from sending more than 50 NASA employees to any one conference outside the U.S.

FAQ 6-1 (Limit applies regardless of funding availability). If funds are still available, does the 50-person limit on international conferences apply?

Answer: Yes. The limit is on how many civil service employees NASA sends, not their costs. Even if NASA's only costs are indirect (e.g., NASA pays employee's salary, but conference sponsor pays his/her travel costs), the attendee still counts against the 50-person limit. Moreover, even if the employee is on leave and pays for all costs in connection with attendance at the conference, the attendee still counts against the 50-person limit if representing NASA (e.g., presenting a paper).

FAQ 6-2 (NASA employees). For purposes of the 50-person limit, are JPL employees considered NASA employees?

Answer: No. JPL is considered a contractor employee, therefore, JPL attendees should count against the 50-person contractor employee limit and not the 50-person civil servant limit.

FAQ 6-3 (International). What is considered “outside the United States?”

Answer: “United States” has the same meaning here as in the FTR, which defines 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).

Note: The term “international conference” includes conferences held entirely at a NASA facility if the facility is outside the U.S.

FAQ 6-4 (Reimbursable travel). If a NASA employee is requested to present at an international conference and the sponsor pays travel/per diem expenses, does the NASA speaker count against the 50-person limit? What if the employee wishes to give a presentation at or otherwise attend an international conference at his or her own expense while on vacation?

Answer:

Even if the employee is on reimbursable travel, if NASA is paying the employee’s salary during the trip, he or she is considered to be on official travel on behalf of the Government and counts against the limit. Employees are reminded to follow standard procedures for Agency acceptance of travel expenses from outside sources in such cases. (See also FAQ 6-1 above.)

If a NASA employee attends an international conference while on vacation, traveling at his or her own expense, and charges no costs to NASA (e.g., for shipping materials), and is not representing NASA (such as by giving a presentation at all related to NASA or its missions/activities) attendance does not count against the 50-person limit. The limit is on the use of appropriated funds “to send or otherwise pay for attendance” at a conference. However, to ensure accurate records for NASA employee international conference attendance, all employees (even those on vacation) planning to attend an international conference shall request attendance via NCTS and obtain advance approval from OIIR. In addition, they must follow any requirements related to representing NASA externally.

(See NPR 9770.1.)

FAQ 6-5 (Single conference with multiple tracks versus multiple conferences). If several international events are held at the same time in the same location 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 international 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. For purposes of consistency, this rule is to be applied for both international and domestic conferences.

7. How do I obtain approval to attend a conference and process the necessary forms?

FAQ 7-1 (Traveler approval steps). I want to go to a meeting that I think is a conference. How do I obtain approval to attend it, process the authorization, and then file a travel voucher for reimbursement?

Answer:

a. Determine whether the event is a conference and whether it is international or NASA-sponsored.

(1) If it is clearly not a conference, simply proceed with normal travel authorization and vouchering, no other steps are required by this NAIL.

(2) If the event clearly is a conference, search for the event in NCTS (<http://ncts.nasa.gov>).

b. Is the conference listed in NCTS?

(1) If it is, note its NCTS Conference Code and select that Conference Code from the drop-down menu of function codes in the electronic travel system when preparing your travel authorization. Also, be sure to select "conference" as the trip purpose. A local POC (typically the Center Travel Office (CTO) designee) will enter your name into NCTS, along with the estimated cost of your travel, based on your travel request. If the conference requires a registration fee, include the amount in the comments field of the e-travel system input screen (it should not be included as an "other" cost unless it will be paid for by the traveler's own travel card). In addition, you must provide the NCTS Conference Code to the office processing your registration fee so that it can be included in the function code field of the Purchase card (including SATERN external training requests) or other procurement transaction used to purchase your registration.

(2) If it is not in NCTS, then follow the guidance in Section 4.1.2 and request that your designated Center POC add the event to NCTS.

c. After a new event is input to NCTS, the NCTS Approver will notify you within one working day whether the event is accepted for inclusion in NCTS and if it is, the NCTS Approver will supply its Conference Code and input the event to NCTS. Once you have the NCTS Conference Code, follow the steps in b.1 above.

(1) For international conferences, submit your travel authorization request to your approver at least five weeks before the planned departure date. After receiving your 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 shall 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 OIIR, in consultation with appropriate Agency representatives, determines the final NASA-wide attendance allocation. If you receive official NCTS approval, proceed with your Center/Office’s international travel process.

Note: NCTS approval simply means that you are tentatively approved with regard to the 50-person limit; you must still obtain your supervisor's separate approval for your attendance at the conference. As with all official travel, an approval in NCTS is not final and may be reconsidered based on subsequent factors, particularly in the case of conferences where more than 50 civil servants and 50 contractor employees request approval to attend.

(2) For any conference travel, if after submitting your travel authorization you realize you forgot to use the appropriate function code/NCTS Conference Code, then as soon as you realize the omission, file an amended travel authorization using the correct function code.

d. After attending the conference, submit your travel expense report as you normally do, including the NCTS Conference Code.

FAQ 7-2. (Reporting P-Card and PR costs). How are non-travel conference costs tracked?

Answer: Search for the event in NCTS (<http://ncts.nasa.gov>).

a. If it is in NCTS, note its NCTS Conference Code and select that Conference Code from the drop-down menu of function codes in the electronic travel system when preparing your travel authorization. Also, be sure to select “conference” as the trip purpose.

If it is not in NCTS, then either submit a new record to NCTS or have one submitted, as your local Center requires. After a new event is input to NCTS, the NCTS moderator will notify the submitter within one working day whether the event is accepted for inclusion in NCTS and if it is, will supply its Conference Code and input the event to NCTS. Once you have the NCTS Conference Code, select that Conference Code from the drop-down menu of function codes in the electronic travel system when preparing your travel authorization. Also, be sure to select “conference” as the trip purpose.

b. Once your travel has been approved the travel office will register you by name in NCTS. This step is necessary because NASA must now track and report total conference spending, including attendance. In addition, NASA must provide specific information on each conferences exceeding \$100,000. In some cases it may be necessary to limit attendance in order for NASA to meet spending limits management establishes for a specific conference.

FAQ 7-3. The conference I want to attend is an international conference—how do I get approved?

Answer: The Congress has limited NASA funded attendance at International conferences to 50 employees. NASA interprets this limitation as 50 civil servants and 50 contractor employees, for a total of 100. In order to comply with this limitation NASA is using NCTS to track and control attendance authorizations. For international conferences, submit your travel authorization request to your approver at least five weeks before the planned departure date. After receiving your 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 shall 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 OIIR, in consultation with appropriate Agency representatives, determines the final NASA-wide attendance allocation. If you receive official NCTS approval, proceed with your Center/Office’s international travel process. Your travel approver will register your name in NCTS as a candidate for the conference.

Appendix A. Contractor Conference Cost Approval and Reporting Process

A.1. The following processes are required only when NASA contractor employees' conference costs (i.e., travel and registration fees) are paid directly with NASA funds (i.e., the contractor's costs will either be paid directly by NASA or submitted for reimbursement in the contractor's invoice).

A.2. Contractor Pre-Conference Approval Process.

- (a) The contractor and/or technical point of contact identifies the need for contractor employee(s) to attend a conference.
- (b) Contractor employee(s) must then coordinate with the respective Contracting Officer (CO)/Contracting Officer's Representative (COR) and Conference Administration Point of Contact (POC) to ensure that any attendance to conferences by NASA contract employees are within the scope, terms, and conditions of the applicable NASA contract.
- (c) The contractor employee's name is entered into NCTS along with all estimated attendance costs.
- (d) In parallel, the responsible Center POC monitors NCTS registrations and approved attendance and cost targets. If at least 30 percent of all conference attendees are NASA contractor employees, including JPL employees, the Lead Center POC notifies the respective Conference Administration POCs and/or travel offices to request that the applicable CORs/COs are reminded of need to report actual costs after the event. The CO/COR is responsible for informing the contractor of the need to track expenses.

A.3. Contractor Post-Conference Reporting Process

- (a) After the event, the responsible Center POC reviews the NCTS Attendees Report for the event and identifies all approved contractor employees to confirm whether contractor attendance was significant or not. Contractor attendance is considered significant when it reaches at least 30 percent of all NASA-funded attendees.
- (b) If the event does have significant NASA-funded contractor attendance:
 - (1) The responsible Center/Office POC contacts the appropriate Center Conference POCs to contact the appropriate CORs/COs to request actual cost data.
 - (2) The CORs/COs will request actual cost data from each contractor.
 - (3) Each contractor provides actual cost data to their Center Conference POC.
 - (4) Each Center Conference POC shall attach the supporting documentation outlining the actual contractor employee costs to the appropriate conference in NCTS and includes the actual costs in the appropriate NCTS NF 1785 form totals.
 - (5) The responsible Center POC initiates the completed NCTS NF 1785 in NCTS to their OIC for approval.

- (c) If the event does not have significant NASA-funded contractor attendance:
- (6) Each Center POC shall attach all contractor estimated costs from NCTS Attendees Report to the appropriate NCTS NF 1785 and include the estimated costs in the NCTS NF 1785 form totals.
 - (7) Each Center POC enters actual costs for civil servants into the appropriate NCTS NF 1785 fields.
 - (8) The responsible Center POC initiates the completed NCTS NF 1785 for OIC approval.