NASA Interim Directive

NID 9312.1

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Requirements Relating to Conference Attendance, Obligations and Expenditures

Responsible Office: Office of the Chief Financial Officer

Enclosure
NID 9312

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CHAPTER 1. Requirements Relating to Conference Attendance, Obligations and Expenditures

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PREFACE

P.1 PURPOSE

This NASA Interim Directive (NID) provides the requirements applicable to conference-related obligations and costs, attendance at foreign conferences, and reporting on costs related to reportable conferences.

P.2 APPLICABILITY

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

P.3 AUTHORITY

a. The FY 2008 Consolidated Appropriations Act, Public Law 110-161
c. 5 U.S.C. § 4109, Government Employees Training Act
d. 5 U.S.C. § 4110, Government Employees Training Act
e. Federal Travel Regulation § 301-74.19, Conference Planning

P.4 APPLICABLE DOCUMENTS

c. NASA Procedural Requirement 9700.1, “Travel”

P.5 MEASUREMENT/VERIFICATION

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

P.6 CANCELLATION

None.
1.1 Purpose and Requirements

1.1.1 This chapter sets forth policies relating to conference reporting and compliance. Beginning with the FY 2008 Consolidated Appropriations Act, Public Law 110-161, and Continuing Appropriations Act, Public Law 110-329 (the Appropriations Acts), Congress requires that the National Aeronautics and Space Administration (NASA): (1) limit travel to a conference outside of the United States (foreign conference) to no more than 50 NASA employees, and (2) provide reports with specified information regarding events meeting the criteria of a “conference” under the Act on a quarterly basis to NASA’s Inspector General for sponsored conferences over $20,000, and annually to Congress. The NASA Authorization Act of 2008, Public Law 110-422 (the Authorization Act, together with the Appropriations Acts referred to as “the Acts”), similarly required an annual report and limited funding for conferences (as of October 15, 2008, authorizing appropriations of “not more than $5,000,000 for any expenses related to conferences, including conference programs, travel costs, and related expenses.”) This spending cap applies to “any expenses related to conferences,” and is very broad in application. The requirements of these Acts are applicable to conference-related obligations and costs incurred for FY 2009 and are in addition to those imposed by the Federal Travel Regulation (FTR) for conference planning and reporting. Because of the complexity of the language of the Acts and challenges the Acts pose in applying it to different events attended by NASA personnel, care must be taken to consider the detailed information found in NASA’s “Guidance for Determining Reportable Conferences” (“Conference Guidance”), attached as Appendix A hereto.

1.1.2 Congress’ restrictions on international travel are stricter than those in the FTR. The restrictions place a limit on the number of NASA employees who may attend a foreign conference.

1.1.3 The Acts require NASA to control obligations and expenditures in connection with conferences, and prepare reports on conference expenses. In order to comply with this requirement, all NASA travelers and personnel incurring procurement obligations and expenses must familiarize themselves with the new requirements and comply with the new procedures relating to conferences. The policies in this chapter apply to NASA offices, travelers, and those involved in the procurement or training processes that support conference sponsorship or attendance. The NASA Conference website has a copy of the mandatory detailed operating procedures for identifying conferences and funding codes for conference attendance in travel and procurement requests, approving travel, limiting foreign conference attendance, and preparing reports on conference attendance and sponsorship.

1.1.3.1 Definition of a “Conference.” For purposes of both the reporting requirements and funding and foreign attendance limitations of the Acts, NASA has defined “conference” to mean a meeting:
a. Held for consultation, education,¹ awareness or discussion; and

b. Involving travel and lodging for at least some attendees; and

c. Which is not an NASA internal meeting; and

d. In which any part of the event is held at a non-NASA facility; and

e. Which: (1) has speakers or discussion panels and (2) focuses on topical, rather than operational or programmatic, matters which are of interest to and involve the participation of, a range of attendees from multiple agencies and/or nongovernmental entities.

1.1.3.2 This definition includes conference expenses regardless of whether or not NASA is the sponsor. It includes most, if not all, externally-sponsored scientific, technical, and professional conferences.

1.1.3.3 A NASA internal meeting is defined as any meeting where all attendees are NASA civil servants, detailees, Special Government Employees, and individuals who are attending on NASA-issued invitational travel orders. It may include employees of other Federal agencies, NASA’s contractors or subcontractors and parties to inter-governmental or interagency agreements with NASA or the U.S. Government when meeting on matters related to NASA’s programs or operations. It may include NASA grantees, including their principal investigators, when meeting on matters directly related to a grant. It also may include NASA Space Act Agreement partners, when meeting on matters directly related to the activities under the Agreement. The Conference Guidance provides detailed explanation on how to apply this definition, and can be found at the NASA Conference website, http://conference.nasa.gov.

1.1.4 Appropriations Spending Cap

1.1.4.1 The new appropriations limitation on conference expenditures requires that NASA be able to consistently apply rules for obligating and expending funds and reporting expenses attributable to conferences. This means that all necessary data must be timely and accurately recorded in NASA’s accounting system, which will be used to control the use of appropriated funds for conference expenditures and prepare reports to OIG and Congress. This new requirement includes NASA funded conference expenses regardless of whether or not NASA was the conference sponsor.

1.1.4.2 Costs of an Event Where Food & Refreshments are Provided under GAO “formal conference” test. In the case of those events which might not otherwise meet the definition of “conference,” but for which food and refreshments are provided at Government expense based on an event satisfying GAO’s standards for “formal conferences” (and not other authority such as for training or awards), all such events will be treated as “conferences” for purposes of the Acts. This result applies whether or not such events are held at a NASA facility or only involve Agency employees. See NASA Procedural Requirement (NPR) 9700.1, “Travel,” Appendix A.

¹ This does not include formal training. See the Conference Guidance for detailed discussion.
1.1.4.3 Definition Includes “Any Expenses Related to Conferences” But Not Allocable Salary. If the definition applies, the spending limit applies very broadly. Because the Act places a limitation on “any expenses related to conferences,” NASA must count “any expenses” towards the $5 million limit. The statute expressly includes travel (including per diem and other travel expenses) and “conference programs,” which NASA interprets as registration, attendance or other fees. Other costs that “relate to” the conference must also be included, such as the cost of developing conference materials and other costs associated with supporting a conference, e.g. handouts, exhibits, facility rental, and costs of sponsorship. In addition, the costs for employees to attend conferences as a judge, speaker, presenter, host of an exhibit booth, or panelist must be included; as well as costs for detailees and persons traveling on invitational travel orders or otherwise sent to a conference by the Agency. However, costs of exhibits for public outreach and education are not subject to the cap if the exhibits are placed in areas open to the general public free of charge and are not being utilized by a NASA attendee as part of a speech or presentation. Further, salaries are not “related to conferences,” even for the period during which a person is attending a conference.

1.1.5 NASA’s Conference Guidance. NASA’s Conference Guidance, Appendix A hereto, is the authoritative guidance for determining whether or not an event is a “conference.” Supplemental guidance may be provided from time to time, and when provided will be posted on the NASA Conference website (http://conference.nasa.gov). No additional interpretative guidance is authorized without the approval of the Agency Office of the General Counsel and Office of the Chief Financial Officer. Questions about whether individual meetings are conferences should be directed to the Center or Headquarter Conference Point of Contact (POC) for determination by their Center/Headquarters Conference Team (composed of members from the local Center/Headquarters offices of Center Counsel and CFO); the NASA Conference Tracking System and its moderators will also be available to assist in the application of the Conference Guidance for proposed meetings. A current list of Center/Headquarters POCs can be found at the NASA Conference website, http://conference.nasa.gov.

1.1.5.1 Funding Sources.

1.1.5.1.1 NASA has established accounting work break down structure (WBS) codes at the project level within each appropriation account, and for which any obligation and/or expenditure in connection with a “conference” must be charged. Because of the limitation placed on NASA’s appropriations with respect to conferences, and the potential for legal and/or disciplinary repercussions if this limit is exceeded by a failure to follow these new policies, care must be taken by everyone at NASA to timely and accurately identify conferences and all associated costs.

1.1.5.1.2 Travel Request Preparation. All persons preparing a travel request must insure that travel to a conference is identified by selecting “Conference” in the e-Travel trip purpose field, and copying the unique identifier (name/code) of the conference from NASA’s Conference Tracking System (NCTS), into the trip purpose description field. In order to adhere to NASA’s spending cap, it is important that all travel requests be submitted, approved and obligated prior to attending any conference. For this reason, no expenses related to a conference may be reimbursed using NASA SF 1164—Claim for Reimbursement For Expenditures on Official Business. Further procedural explanations, along with a discussion on how to identify costs...
attributable to a conference in multi-purpose travel, can be found at NASA’s Conference website.

1.1.5.1.3 NCTS and Identifying Conferences. The NASA Conference Tracking System is a moderated website, providing a process for both determining which events meet the definition of “conference,” and for posting on a searchable website a unique identifier for use in connection with each such event. If an event is not yet listed in NCTS but is potentially considered a conference, a request should be submitted to the Center/Headquarters POC or NCTS for determination on whether or not the event meets the definition of a conference. The requester will be notified of the determination, and if the event is a conference, a unique identifier (name/code) will be promptly added to the listing of conferences at NCTS. (See section 1.1.7 below for further discussion about NCTS).

1.1.5.1.4 Travel Approval, and P-Card and Procurement Requests. Before any travel request or voucher indicating a purpose of “Conference” is submitted for approval, it must include an appropriate conference WBS fund code for all obligations or expenditures relating to the conference. Any P-Card or Procurement request must similarly select an appropriate conference WBS fund code for all obligations or expenditures relating to the conference. Where a NASA contractor is directed by NASA to incur expenses for a conference in performance of its contract, or a grant calls for a grantee’s support of conference-related activities, any obligations and expenditures related to such are also required to be timely and accurately submitted using an appropriate conference WBS fund code (see the Conference Guidance for further discussion).

1.1.5.1.5 Conference Registration Fees. Conference registration fees should preferably be included as part of a travel request and voucher. If the requests are handled by a Center or Office travel office or preparer, they may also be processed as part of a P-Card or centrally billed account transaction. However, registration fees for a conference are no longer to be processed through a SATERN training request.

1.1.6 Foreign Conferences.

1.1.6.1 In addition to a spending cap on conferences, no more than 50 employees may attend a conference held outside the United States. “United States,” as defined in the FTR, means the 48 contiguous States, the District of Columbia and the States and areas defined under the term “Non-Foreign Area.” Non-Foreign Area includes Alaska and Hawaii, the Commonwealths of Puerto Rico, Guam and the Northern Mariana Islands and the territories and possessions of the United States (excludes the Trust Territories of the Pacific Islands). (See FTR § 300-3.1) For purposes of this limitation on the number of NASA employees (but not the spending cap), an event that would otherwise be excluded from the definition of “conference” because it is held entirely at a NASA facility, will still be considered a “foreign conference” when the facility is outside the United States.

1.1.6.2 A foreign conference is considered “non-program” foreign travel (see NPR 9700.1 Travel, Appendix A §301-2.13). In instances where a particular trip mixes travel to a conference with other purposes, the procedures for “non-program” travel are to be followed. The requirements of this section do not replace, but are in addition to, other Agency or Center requirements for foreign travel approval.
1.1.6.3 NASA’s automated systems for identifying conferences and tracking foreign conferences shall be used to ensure compliance with these requirements. NASA’s Conference Tracking System (NCTS) currently enables approvers of prospective foreign conference attendance to register and receive automated verification that the attendee limit has not been reached prior to approving travel arrangements. Requests will automatically be accepted up to an Agency moderator-established first threshold (permitting automatic registration for small conferences). After the first threshold has been reached, the moderator will manually accept the remaining space allotments as approved by a NASA point of contact (currently the Office of External Relations, working with other offices and Centers) for Agency-wide allotments, never exceeding 50 total. Once approved in the NCTS, the travel request should be processed for approval in accordance with other established Center or Headquarters procedures for foreign travel.

1.1.6.4 Due to diverse operational practices, Centers and Headquarters Offices should designate a person to be the single point of contact or coordinator for travel to foreign conferences. However, it is the responsibility of all approvers to ensure that any requested travel to a foreign conference is approved only if it falls within the threshold of no greater than fifty attendees (NASA-wide) to any one foreign conference.

1.1.7 NASA Sponsored Conference Reporting.

1.1.7.1 Required Reporting. NASA conference sponsors are required to provide NASA’s Conference Reporting Team, via its agency email account (conference-sponsor@mail.nasa.gov), with two forms, NASA Sponsored Conference Approval Form and NASA Sponsored Conference Reporting Form, in a timely manner. Detailed instructions regarding use of the forms are available on the Conference Reporting web site (http://conference.nasa.gov). The NASA Sponsored Conference Approval Form provides necessary cost estimates and conference identification information to all NASA travelers, approvers, and procurement personnel so they can properly complete other records related to the sponsored conference. The NASA Sponsored Conference Reporting Form provides necessary actual cost, contracting, and other information needed to prepare NASA’s required quarterly and annual reports.

1.1.7.2 When to Use These Forms. Both forms are required for events that are sponsored by NASA and which either (a) meet the definition of “conference” under the Conference Guidance, regardless of the number of attendees, or (b) meet the requirements of FTR 301-74.19 (i.e., an off-site meeting, retreat, seminar, symposium or event that involves attendee travel, having at least 30 attendees, for which NASA must maintain a record of the costs for alternative (i.e., non-NASA) sites considered for the event).

1.1.7.3 Forms Disposition. A copy of each completed, approved form should be forwarded to the Conference Reporting Team, with the original kept in local records and available for review as needed.

1.1.8 The NASA Conference Tracking System (NCTS).

1.1.8.1 To support the reporting requirements imposed by Congress, and to standardize and simplify conference data recordkeeping in related information systems, NASA has developed an enterprise-wide database. It can be accessed by conference attendees, procurement personnel,
conference planners, financial managers, and others supporting conference participation in NASA. The database is accessible to all NASA employees and NASA Conference Support Contractors at the NASA website (http://ncts.nasa.gov) and is maintained by the NASA Conference Reporting Team. All travel and procurement records related to conferences should be encoded with registered conference names from the NCTS. NCTS database records will be generated by attendees and conference sponsors and be moderated and maintained by the NASA Conference Reporting Team.

1.1.8.2 While NCTS will be constantly updated by its moderators based on input from Center travel offices and others, because of the wide variety of conferences attended by NASA employees, all NASA personnel connected with conference-related travel or charges must familiarize themselves with NCTS. Whether a conference sponsor, attendee, approver, procurement official or purchase card user, or travel coordinator, any user requesting or approving an obligation or charges connected with a conference is responsible for familiarizing themselves on (a) how to search NCTS for events listed as a conference in the NCTS database, and (b) how to request a determination from NCTS on whether an event should be added to the NCTS database as a conference.

1.1.8.3 The Conference Reference Number is a number associated with a particular conference. If the conference is not on the NCTS database, an electronic form will be provided for the end user to fill out and send to the NASA Conference Reporting Team to create a reference number. This reference number will be added to the database and e-mailed to the requestor.

1.1.9 Travelers, Training and Travel Coordinators, and Purchase Card Holders.

1.1.9.1 Travelers, training coordinators, and travel coordinators are required to limit the use of the travel systems Trip Purpose field for “Conference” to include only those conferences qualifying as a reportable conference as defined in this NID. When “Conference” is selected, the user must also copy the unique identifier (name/code) of the conference from NASA’s Conference Tracking System (NCTS), into the trip purpose description field. Furthermore, sponsoring offices must notify the NASA Conference Reporting Team as early as possible when it is known that a conference is to be sponsored and it is anticipated it will meet the criteria for reporting (e.g., promptly after site approval). Centers and Headquarters Offices must work to make this information available to travelers and travel coordinators. Conference sponsors must make clear to participants that the naming convention established by the sponsor is the name to be included in the travel systems where the event names are likely to be recorded. The same naming convention rule applies to all conference-related transactions recorded for purchase card purchases, travel vouchers, purchase orders, and registration fees.

1.1.9.2 The Acts establish a requirement for NASA to collect and report specific conference cost data on a quarterly and annual basis. These costs include, but are not limited to registration fees, reservation of conference rooms, audio/visual support, etc. In order to capture this information purchase cardholders are required to enter the Conference Reference number when creating a purchase card order log within P-Card Web Solution to enable retrieval of the data to report costs associated with a particular conference. All obligations and expenses for conference costs must be charged using one of the NASA conference accounting WBS codes. As new records are
added, they will be annotated as either domestic or foreign as defined by the definition in Section 1.1.5 of this NID.

1.1.10 Records Management.

1.1.10.1 Congress requires NASA to collect and report specific data related to business conference sponsorship and participation. This information is to be collected on a quarterly basis to support the generation of quarterly and annual cost reports. While most of the required data will be based on SAP reports, some additional information is required and NASA’s Conference Reporting Team has developed guidelines for identifying and maintaining source records used to support the ongoing conference cost data reporting requirement. The guidelines are accessible to all NASA employees and NASA Conference Support Contractors at the NASA website (http://conference.nasa.gov) and are maintained by the NASA Conference Reporting Team.

1.2 Roles and Responsibilities

1.2.1 The NASA Conference Reporting Team shall develop guidelines, together with NASA’s Office of the Chief Financial Officer and Office of the General Counsel, and manage the collection of data as needed from Centers and Headquarters offices and preparation of required quarterly and annual reports.

1.2.2 Centers, NSSC and Headquarters offices shall train their personnel in NASA’s policies and procedures relating to conference expenditures and attendance, to insure against NASA exceeding its overall spending cap and limit on attendance at foreign conferences, as well as to satisfy NASA’s conference reporting requirements.

1.2.3 The NASA Conference Reporting Team shall maintain the NCTS, and is responsible for compiling, validating, and preparing the required Agency-wide reports on conferences. The NASA Conference Reporting Team is responsible for maintaining procedures relating to conference-related reports and data collection.

1.2.4 Each Center/Headquarters Conference Team, along with the NCTS moderators, shall be responsible for determining whether individual meetings are “conferences” or not, and for ensuring that events determined to be conferences are promptly listed as such in NCTS. An Agency Team composed of a majority of members from the Agency Office of the General Counsel and Office of the Chief Financial Officer shall be the final authority for determinations, such as cases of conflicting determinations from different Center Conference Teams.
APPENDIX A: NASA Guidance for Determining Reportable “Conferences”

The FY 2008 Consolidated Appropriations Act, P.L. 110-161, and the FY 2009 Continuing Appropriations Act, P.L. 110-329 (the Appropriations Acts), and the FY 2009 NASA Authorization Act, P.L. 110-422 (the Authorization Act), (together, the Acts) require that the National Aeronautics and Space Administration (NASA) provide detailed quarterly reports to NASA’s Inspector General (for NASA sponsored conferences costing more than $20,000) and an annual report to Congress regarding the cost of all events meeting the criteria of a “conference.”

The Acts contain two additional limitations on conference participation by NASA. First, the Appropriations Act requires that none of the funds made available by the act may be used to send or otherwise pay for the attendance of more than 50 employees from NASA at any single conference occurring outside the United States. Second, the Authorization Act limits the total amount of FY 2009 funds to $5,000,000, for any expenses related to conferences, including conference programs, travel costs, and related expenses. Because this spending cap applies to “any expenses related to conferences,” it is very broad in application. There are also special limitations on Space Flight Awareness events.

As a result of this change, no NASA employee may incur any costs related to a conference, as discussed more fully below, without obtaining advance approval.

I. Meaning of “Conference”

Definition of Conference. For purposes of both the reporting requirements and funding limitations of the Acts, NASA has defined “conference” to mean a meeting:

(1) held for consultation, education,\(^2\) awareness or discussion; \textbf{and}\n
(2) involving travel and lodging for at least some attendees; \textbf{and}\n
(3) which is not an NASA internal meeting; \textbf{and}\n
(4) in which any part of the event is held at a non-NASA facility; \textbf{and},\n
(5) which (a) has speakers or discussion panels and (b) focuses on topical, rather than operational or programmatic, matters which are of interest to and involve the participation of, a range of attendees from multiple agencies and/or nongovernmental entities.

This definition includes conference expenses regardless of whether or not NASA is the sponsor. It includes most, if not all, externally-sponsored scientific, technical, and professional conferences.

\footnote{\(^2\) This does not include formal training. See discussion below.}
**Definition of NASA Internal Meeting.** The definition of conference excludes NASA internal meetings. A NASA internal meeting is defined as any meeting where all attendees are NASA civil servants, detailees, Special Government Employees, and individuals who are attending on NASA-issued invitational travel orders. It may include employees of other Federal agencies, NASA’s contractors or subcontractors and parties to inter-governmental or interagency agreements with NASA or the U.S. Government when meeting on matters related to NASA’s programs or operations. It may include NASA grantees, including their principal investigators, when meeting on matters directly related to a grant. It also may include NASA Space Act Agreement partners, when meeting on matters directly related to the activities under the Agreement.

Therefore, the cap on conference spending does not apply to the execution of routine NASA business, such as program or project reviews and meetings, meetings of international governmental officials for the purpose of coordination on technical, operational, or programmatic matters, site visits and launch functions, advisory committee meetings, and public affairs activities supporting events to which the general public is invited with no fee. If the sole purpose of the meeting is to discuss NASA business, such as scientific, technical, business or programmatic actions, plans, or priorities for a specific NASA program, project, or mission support matter, then the meeting is not a conference for purposes of this limitation.

Where a meeting is otherwise an internal NASA meeting, the presence of outside speakers or facilitators will not, without more, turn such a meeting into a “conference.”

**Special Rule for Meetings Where Food & Refreshments Are Provided.** GAO has stated that appropriated funds are not available to provide food to government employees at their duty station absent statutory authority. There are a few exceptions to this general rule, including employee training and awards events and those that have been determined to meet the GAO test for a “formal conference.” Notwithstanding the definition of “conference” set out above, all events at which appropriated funds are used to provide food because the event satisfies GAO’s standards for formal conferences will be treated as “conferences” for purposes of the Act, whether or not such events are held at a NASA facility or only involve Agency employees. This does not apply to events for which other statutory appropriation authorities have been the basis for Government funding of food, such as employee training and awards ceremonies, and use of the Official Representational Fund. This also does not apply to events where host organizations provide food or refreshments at no cost to NASA (e.g., a programmatic meeting where a host organization provides refreshments, but no fees are charged, but ethics restrictions on acceptance of gifts from outside sources will apply).

Note that the Agency may pay an entity, such as a hotel, directly for meals at a conference if a) ONLY for NASA employees or detailees on travel or invitational travelers, b) if the amount

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3 Note, however, that the Authorization Act does prohibit use of funds to support a Space Flight Awareness Launch Honoree Event conference.

4 Again, no Government funded food or refreshments are permitted at such meetings, unless approved by legal Counsel under other authorities, such as those for training and awards ceremonies.
charged for the meal is within the per diem for the given meal, and c) the travelers’ per diem is reduced correspondingly. In these cases, those payments are subject to the $5 million cap.

Formal Training Excluded. The definition of conference for the $5 million agency-wide cap does not include meetings limited to formal training of NASA employees. An established course of instruction in a substantive field in a classroom setting is not considered a conference, and similar coursework held at a rented facility is not thereby transformed into a conference. On the other hand, where a conference has a training aspect, e.g., by helping employees maintain certification requirements or earn continuing education credits, but more closely meets the definition of “conference” than that of “training,” it should be treated as a conference. Many conferences include the presentation of substantive materials that are educational in nature, but which do not meet the definition of formal training.

Definition Includes “Any Expenses Related to Conferences” But Not Allocable Salary. If the definition applies, the spending limit applies very broadly. Because the Act places a limitation on “any expenses related to conferences,” NASA must count “any expenses” towards the $5 million limit. The statute expressly includes travel (including per diem and other travel expenses) and “conference programs,” which NASA interprets as registration, attendance or other fees. Other costs that “relate to” the conference must also be included, such as the cost of developing conference materials and other costs associated with supporting a conference, e.g. handouts, exhibits, facility rental, and costs of sponsorship. In addition, the costs for employees to attend conferences as a judge, speaker, presenter, host of an exhibit booth, or panelist must be included; as well as costs for detailees and persons traveling on invitational travel orders or otherwise sent to a conference by the Agency. However, costs of exhibits for public outreach and education are not subject to the cap if the exhibits are placed in areas open to the general public free of charge and are not being utilized by a NASA attendee as part of a speech or presentation. Further, salaries are not “related to conferences,” even for the period during which a person is attending a conference. Thus, fully reimbursable travel arrangements for conference attendance will not count towards the cap; partially reimbursable arrangements will count to the extent of the unreimbursed expenses. As always, reimbursable travel arrangements must be approved in advance and may not be solicited.

Expenses Related to Conferences May be Allocated Separate from Those for Other Events. It is a common and acceptable practice to schedule programmatic meetings in conjunction with a conference as a way to save money and facilitate attendance. If an employee travels to a meeting or other event and also attends a conference on the same trip, the Agency must account for the costs attributable to the conference. In those cases, the Agency will determine the percentage of time spent participating in the conference in proportion to the entire trip. The same percentage

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5 Training is defined as a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields which will improve individual and organizational performance and assist in achieving the agency's mission and performance goals. Payment for meals that are “necessary expenses of the training” are authorized for employees under 5 U.S.C. 4109.

6 This is distinct from other conference restrictions, such as the 50-person limit on attendance at international conferences. Consolidated Appropriations Act, 2008, Pub. L. 110-161, Division B, Title V, Section 543.
of the travel expenses will be counted as conference spending, unless there are no additional costs incurred as a result of the conference attendance.

**Expenses Related to Conferences for Contractors Count to Cap.** Where a contractor or subcontractor incurs expenses related to conferences as a result of NASA direction, NASA FY 2009 funds in the hands of contractors at any tier are subject to the statutory restriction. This will normally be evidenced by a statement of work (SOW), work/task order, or other form of NASA direction. An example of this is travel to conferences arranged under logistical and event planning support contracts and task orders, and those costs must be included.

Expenses for conferences that are not included in or necessary for the performance of a contract or task order, and are not incurred at NASA direction, are not subject to the statutory limitation.

**Grant Recipients Not Subject to Cap, with Exceptions.** Recipients of NASA research, education or training grants, including grant funds for post-doctorate and other fellowships or guest investigators, are not subject to the limitation, because, unlike contractors, grant recipients are neither legally bound to perform a NASA work statement, nor subject to agency direction under the grant. It is standard practice for research grant proposals to include a presentation at a scientific conference after the completion of the research. These are not solicited by NASA, but are included in the grant as awarded. This is not to be included in the $5M cap. Research service agreements (RSA) are treated like grants and conference costs paid for by an RSA do not count as NASA conference spending. In addition, cooperative agreements involving NASA funding are subject to the same rules as grants. Therefore, conference costs paid for under a cooperative agreement will not normally count as NASA conference costs.

There is a qualification to the general exclusion of grants and cooperative agreements from the statutory restriction. Grants or cooperative agreements that expressly call for support of conference-related activities or for participation in a conference at NASA’s request are subject to the statutory restriction.

**Space Act Agreements should be examined on a case-by-case basis.** Like grants and cooperative agreements, funded Space Act Agreements may expressly call for support of conference-related activities or for participation in a conference at NASA’s request and would be subject to the statutory restriction in such instances. In other cases, the partner's activities under the Space Act Agreement would not be included in the $5 million cap because no NASA funding is transferred to the Space Act Agreement partner; however, the activities of the NASA individuals under the Space Act Agreement would be included in the $5 million cap if those activities would otherwise be included under the applicable definition.

In addition, the Agency does not have authority to collect registration fees. In cases where a Space Act Agreement is structured such that the partner collects registration fees, there may be other fiscal law concerns, such as an augmentation of Agency appropriations.

**Foreign Conference Attendance.** The Acts also prohibit more than 50 Federal employees from attending a single conference occurring outside the U.S. Unlike the $5 million limit on conference spending, even fully reimbursable travel to international conferences is counted towards the 50-person limit. In order to ensure compliance with this requirement, Officials-in-
Charge must ensure prompt and timely submission of foreign travel requests (i.e., four weeks before the planned departure date), regular weekly submission of foreign travel reports to the Office of External Relations, and consistent use of the NASA Conference Tracking System. The Office of External Relations will establish a committee of appropriate representatives to determine appropriate allocations for international conferences that may exceed the 50 Federal employee limit. These allocations will reflect conference focus and Agency strategic communication interests.

Limitation on Other Guidance. No further interpretative guidance is authorized without the approval of the Office of General Counsel and Office of the Chief Financial Officer. Questions about whether individual meetings are conferences should be directed to the NASA Conference Tracking System and its moderators for determination; Center Counsel and CFOs will also be available to assist in the application of this Guidance for proposed meetings.

II. Conference Decision Chart and Frequently Asked Questions (FAQs).

In order to assist with determining what qualifies as a “conference,” the following decision aides are being provided. In addition to these, every office or center has a designated Point of Contact (POC) for Conference reporting, and these POCs should be consulted in the first instance about questions on whether or not an event is a “conference.” A list of current POCs is available at the website http://conference.nasa.gov. In addition to these POCs, an Agency Conference Reporting Team has been established to provide determinations and consistent guidance for NASA in applying this definition, and the local Counsel is available to provide legal advice related to “conferences.”
A. “Conference” Decision Chart


Is It A “Conference”?

1. Is any portion of the event held outside of a NASA facility? 🌐
   - NO
   - YES

2a. Is the event held for consultation, education, awareness, or discussion?
   - NO
   - YES

2b. Does it (a) have speakers or panels and (b) focus on topical, rather than operational or programmatic, matters of interest to a range of non-NASA attendees?
   - NO
   - YES

The event is not reportable as a “conference” 🌐

3. Was the event more than a NASA internal meeting? 🌐
   - NO
   - YES

The event is a “conference” 🌐

4. Was NASA a Primary Sponsor of the Event?
   - YES
   - NO

5. Is the total cost to the NASA greater than $20,000?
   - YES
   - NO

6. Was the event held outside the United States?
   - YES
   - NO

It is also Reportable as a “NASA Sponsored Conference” 🌐

C. A NASA internal meeting is defined as any meeting where all attendees are limited to: 
(a) NASA civil servants, detailees, Special Government Employees, and individuals who attending on NASA-issued invitational travel orders; 
(b) employees of NASA’s contractors or subcontractors and parties to inter-governmental or interagency agreements with NASA or the U.S. Government when meeting on matters related to NASA’s programs or operations; 
(c) NASA grantees, including their principal investigators, when meeting on matters directly related to a grant.

A. IMPORTANT EXCEPTION: If food is paid for under the “formal conference” exception, the event is treated as a “conference” 🌐

B. For the purposes of the Conference reporting requirement the locations listed below are considered NASA Facilities:
- ARC
- DFRC
- GRC
- GSFC
- JPL
- JSC
- KSC
- LaRC
- MSFC
- SSC
- NASA HQ
- IV and V Facility
- Michoud Assembly Facility
- White Sands Test Facility
- Plum Brook Station
- Wallops Flight Facility
B. Frequently Asked Questions (FAQ) About “Conferences”

The criteria below have been developed in order to provide more detailed guidance on how to apply the “Conference” Decision Chart above, as well as to enhance consistency in tracking “conference” expenditures as required by the Acts. Each of the numbered criteria in the Decision Chart is briefly discussed below, along with a quote from the relevant portion of the Acts. Because of the complexity of the language of the Acts and challenges, posed in applying it to the variety of events attended by NASA personnel, frequently asked questions and answers have also been provided for each criterion.

When applying the Decision Chart and FAQs below, there is an important exception to the rules for determining when an event is not a conference. If food and beverages are paid for by NASA funds and the basis for authorizing payment for such is GAO’s “formal conference” test, then the event will be treated as a conference. This is not the case when food is provided under different authority such as for training and for employee awards ceremonies.

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

An event is not considered a conference based on this criterion if all sessions, meetings, presentations, and other activities that are part of the event are held on a NASA Facility.

FAQ 1-1 (agency). Does “agency” only mean NASA, or does it include other Federal Agencies?

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

FAQ 1-2 (NASA facility). What is considered a NASA “facility”?

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

- All Centers (ARC, DFRC, GRC, GSFC, JSC, KSC, LaRC, MSFC, SSC, JPL and NASA HQ); and
- IV & V Facility, Michoud Assembly Facility, White Sands Test Facility, Plum Brook Station, and Wallops Flight Facility.

A more complete listing will be published at the website, [http://conference.nasa.gov](http://conference.nasa.gov).

FAQ 1-3 (leased facilities). Are leased facilities (office buildings, sites, etc.), leased by NASA on a continuing basis, considered to be NASA facilities if they are not located within the boundaries of a NASA Center or other NASA facility identified in the Answer to FAQ 1-2?

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

FAQ 1-4 (local travel). If NASA did not pay for any lodging and the only travel expense was for local travel, is an event considered a “conference”?
**Answer:** Yes, treat it as a conference unless you have supporting documentation showing no attendee paid for lodging in connection with the event. While a meeting is considered a “conference” only if it involves travel and lodging for at least some participants, this is not limited to events where NASA paid for lodging. As a result, unless NASA has evidence that all participants involved were only on local travel, an event otherwise meeting the elements of the definition of “conference” will be treated as a conference.

Keep in mind that exception for those events which have been determined to satisfy GAO’s standards for “formal conferences” as a justification for Government funding for food or refreshments, all such events will be treated as “conferences” for purposes of the Act. This applies whether or not such events only involve local travel, are held at a NASA facility or only involve Agency employees (but this does not apply to events for which other statutory appropriation authorities have been the basis for Government funding of food, such as training and award ceremonies).

**FAQ 1-5 (Pre-approval Required).** If I forget to get pre-approval before attending a conference on local travel, am I allowed to obtain reimbursement for my local travel and other costs connected with the conference?

**Answer:** No. Pre-approval is required before attending any conference, even conferences for which there is local travel. In order to get reimbursed for local travel, a travel authorization needs to be submitted and approved prior to attending the conference. The only exception is in the narrow case of attendance at a local U.S. (non-foreign) conference, in which there will be no cost incurred in connection with travel or attendance at the conference; in this case, no travel authorization is required for attending the local conference. In the case of foreign conferences, pre-approval is always required, even if traveling under fully reimbursable orders or only locally.

**FAQ 1-6 (minimum cost).** Is there a minimum dollar threshold amount for travel and lodging expenses that must be entered when related to a qualifying conference?

**Answer:** No. All obligations and expenses connected with an event must be entered in NASA’s financial systems when the event meets the definition of a conference.

**FAQ 1-7 (multi-purpose trips).** If I am attending a conference as well as a programmatic meeting on the same trip, which costs do I charge to the conference?

**Answer:** If an employee travels to a conference and also attends a non-conference meeting on the same trip, the Agency must account for all costs attributable to the conference. For those costs readily identifiable as incurred in connection with the conference, these should be obligated and charged under an appropriate funds code for conferences. For those costs that are attributable to both a conference and non-conference event(s), the costs should be charged to a conference fund code based on the percentage of time spent participating in the conference, and to other fund code(s) based on the percentage of time spent on the non-conference event(s). The percentage of time should be calculated rounded to the nearest whole hour, using eight hours for a typical working day.
For example, if an overnight trip to a conference also includes attendance at a program-related meeting in the same city, with 2 hours at the meeting, 2 working hours on travel or between events, and the remainder at the conference (4 hours), then out of the six hours attributable to both events, 2/3 of the time would be attributable to the conference. In this case, 2/3 of the cost of travel, lodging and per diem would be charged to a conference fund code, and the remainder to an appropriate non-conference fund code. Any registration fee or other unique conference cost would be fully charged to the conference fund code. See also FAQ 7 below.

FAQ 1-8 (estimates/disbursements). Is the “cost” of a conference based on recorded or estimated cost, or on the actual amounts disbursed?

**Answer:** The $5 million dollar cap is a limit on NASA’s FY 2009 appropriation funds. As such, it applies to authorizations, obligations, and disbursements. Because of this, it is critical that all obligations, costing, and disbursements are entered correctly in NASA’s financial systems, charged against one of the unique (WBS) work break down structure codes newly set up for conferences in FY 2009. For purpose of reports to Congress, the “cost” to be reported will be based on amounts disbursed, unless only estimates are available (for example, for travel too close to the end of the reporting period for disbursements yet to be recorded, or only estimates are available from a contractor at the time). The balance remaining available for obligation of these new WBS codes can be determined from SAP.

FAQ 1-9 (contractor costs). When NASA contractors participate in conferences, are those costs to be entered and reported?

**Answer:** Yes, NASA FY 2009 funds in the hands of contractors at any tier are subject to the statutory restriction if the contractor incurs conference-related expenses as a result of NASA direction, such as a statement of work, task order, or other Agency direction. Expenses for conferences that are not included in or necessary for the performance of a contract are not subject to the statutory limitation. All costs are tracked based on the best information reasonably available from NASA’s records such as invoices, cost reports, or other information currently provided by the contractor. Travel to conferences arranged under logistical and event planning support contracts must be included as well.

Particular attention should be paid to ensuring proper procurement records in connection with NASA-sponsored conferences, as it is more likely contractor support costs for such events have been incurred and reported to NASA in sufficient detail to identify costs connected with a specific reportable event.

FAQ 1-10 (Support contractor costs included in indirect rates). Are all costs connected with conference support services contracts or work orders, including award fees and burden or other indirect charges, included?

**Answer:** Yes. In NASA sponsored events that meet the definition and where a support contractor is directed to support the event under a specific Work Order, Task Order or the like, the total expense of the Task Order are chargeable and reportable.
FAQ 1-11 (Grants and Cooperative Agreements). When NASA grantees participate in “conferences,” are those costs to be identified and reported?

**Answer:** Generally No. Recipients of NASA research, education or training grants, including grant funds for post-doctorate and other fellowships, are not subject to the limitation, because, unlike contractors, grant recipients are not bound to perform a NASA work statement, nor typically subject to agency direction under the grant. Even if the grantee offers to make a presentation at a scientific conference after the completion of the research, these costs are not reportable. However, if the RFP or other grant solicitation requires presentation at an event that qualifies as a conference, then the portion of the grant funds attributable to the conference presentation will be treated as subject to the $5M cap and reported. Further, grants are subject to statutory restrictions on conference support, such not being used for the purpose of defraying the costs of a conference unless it is “directly and programmatically related to the purpose for which the grant or contract was awarded.” Similarly, cooperative agreements involving NASA funding are subject to the same rules as grants—conference costs paid for under a cooperative agreement are not normally treated as reportable conference costs, but if a cooperative agreement requires participation in activities qualifying as a conference, those costs should be counted towards the limitation and reported.

2. Is the event held for consultation, education, awareness, or discussion; and does it (i) have speakers or discussion panels and (b) focus on topical, rather than operational or programmatic, matters which are of interest to and involve the participation of, a range of participants from multiple agencies and/or nongovernmental entities?

A meeting is considered a “conference” only if the purpose is specifically for consultation, education, awareness or discussion, and if it has speakers/panels focused on topical matters of interest to a range of non-NASA participants.

FAQ 2-1 (management/governance meetings). Are programmatic and institutional management meetings, such as those required in NPD 7120.4C, and NPRs 7120.5C and 7120.5D, considered conferences?

**Answer:** No. Meetings are not considered reportable if specifically for the purpose of governance of NASA or one of its organizational units, or for carrying out a NASA program or project (i.e., a “program-specific” purpose). Examples would include the NAC, SMC, OMC, and the like.

FAQ 2-2 (program meetings). Based on the use of broad terms like “discussion” in the definition of conference, i.e., "event held for consultation, education, awareness, or discussion," it almost sounds like some or many gatherings of any NASA civil servant with a non-NASA person would be considered a conference. Is that correct?

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

FAQ 2-3 (program-specific vs. general nature). Are any conferences that have as their purpose “discussion” of a specific program reportable?

**Answer:** Generally no, but some are. A conference would be reportable if it has as its primary purpose promoting general awareness of a program, as opposed to specific planning, execution or analysis of a program (including projects, grants, advisory panels and the like). For example:

(a) Fundamental Aeronautics Annual Conference: is reportable, since its basic purpose is promoting general awareness of the program, as further evidenced by attendees from the general public not specifically working on the program.

(b) PM Challenge: was reportable in FY 2008, since it was of a topical nature of interest to a broader audience, and qualified as a formal conference. However, PM Challenge is planned to be an internal NASA meeting in FY 2009.

(c) Fundamental Aeronautics Annual Review: is not reportable, since it is a formal review of a program, with the non-NASA participants attending primarily as review panel members, not for general awareness.

(d) Quarterly Program Management Review: is not reportable, even if off-site and attended by contractors or partners, as it is focused on review of a program, not general awareness.

(f) The following are some additional examples of events determined **not** to be reportable “conferences”:

- Required programmatic and institutional management meetings, including those identified in NPD 7120.4C, NPR 7120.5C, and NPR 7120.5D;
- Formal education or training classes;
- PPBE process budget reviews;
- Routine program/project management meetings;
- Mishap Investigation Boards (usually at contractor facilities);
- Program Management Reviews;
- Management Council Meetings;
- Quarterly Program Management Reviews.
FAQ 2-4 *(name includes “conference”). Are all meetings with “conference” in the title a reportable event?*

**Answer:** In general, yes. However, titles can be misdescriptive and what matters is the purpose of the event, not the use of a term like “conference,” “meeting,” “awareness,” “consultation,” or “discussion” in the title. Thus, if you are aware of additional information indicating that an event entitled “Conference” is a program-specific event, it should not be considered as “held for consultation, education, awareness, or discussion.”

FAQ 2-5 *(working groups). Are “working groups” considered conferences?*

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

FAQ 2-6 *(training). Are training events considered conferences?*

**Answer:** In general, no, but some will be. While the Act does use broad terms like “education” and “discussion” to describe reportable events, they are still in the context of events that are “conferences.” Thus, a specific, established course or set of courses in a classroom setting are not considered a “conference.” Similarly, attendance at a university, professional school, or the like is not considered a “conference.” Likewise, coursework that just happens to be held at rented facility because it overflowed classroom limits is not automatically transformed into a “conference.” However, a widely attended event with a variety of topical meetings offered, held at a hotel or other form of conference facility, should be reported as a conference. Even if the only purpose of an individual attendee is to receive updated training on a specific area and/or maintain a certification, the more general nature of meetings offered in a setting open to a broader, general audience makes it a reportable conference.

For example, attendance at the following events meet this criterion and should be reported (provided, of course, they are not excluded under one of the other criteria): the U.S. Office of Government Ethics’ annual Government Ethics Conference; the Annual Federal Dispute Resolution Conference; AIAA’s Annual Conference on Small Satellites; the IEEE Workshop on Network Security; the High Tech Small Business Conference; and the Flight Test Safety Workshop (providing an open forum on flight test safety issues). But, coursework such as a semester-long University course or a professional school class fit the language of the Act. Also, remember to apply the other criteria for determining reportability, such as whether the event was off-site, or had non-NASA participants. For example, you do not report any training held on a NASA facility (see 1 above), or training in which there were only NASA participants. (see 3 below).
FAQ 2-7 (division off-site meetings). Is my department’s off-site meeting considered a conference?

**Answer:** Generally, No. These typically fall within the exception for NASA internal meetings (see 3 below). However, if outside participants (and not just facilitators) are attending, the nature of the meeting may still exclude it from being considered a conference. If the meeting is a lessons learned or strategic planning event, these are almost always narrowly operational or programmatic in focus. But broader, topical meetings or ones not strictly operational in focus (e.g., team-building events) may qualify as a conference. Close questions involving the nature of an event possibly qualifying as a conference should be reviewed with your Center’s conference point of contact and/or lawyers.

FAQ 2-8 (college degrees). Is travel/TDY in connection with NASA-paid education in pursuit of a college degree considered a conference?

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

FAQ 2-9 (presenters or judges). Is travel for a NASA employee serving as a speaker, presenter, judge, or host at an exhibit booth at a non-NASA event a conference?

**Answer:** In general, yes. These presentations are typically done for general outreach and awareness. This includes speakers’ bureau events. But, see FAQ 3-2 (presence of an outside facilitator does not turn a NASA internal meeting into a conference).

3. **Was the event an internal NASA meeting, i.e., were the only attendees (a) NASA civil servants or detailees, (b) employees of NASA’s contractors or subcontractors, or of parties to inter-governmental or interagency agreements with NASA (when meeting on matters related to NASA’s programs or operations), and/or (c) NASA grantees (when meeting on matters directly related to a grant)?**

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

FAQ 3-1 (JPL and other NASA contractors). Are events attended by JPL or other NASA contractor employees considered internal NASA meetings?

**Answer:** Yes, if the events are limited to NASA civil servants and contractor employees, and the meeting is on NASA programs or operations, it is not considered a conference.

FAQ 3-2 (facilitators). Do non-NASA facilitators, speakers, and presenters affect the determination of whether a meeting is a NASA internal meeting?

**Answer:** No. Outside facilitators and speakers are generally contractors participating in a manner related to NASA programs or operations. In those cases where speakers or
presenters are not paid contractors, their presence as a speaker is typically related to operational or programmatic matters of NASA (see 2. above; however, a widely attended meeting like an interagency roundtable focused on topical matters beyond NASA’s programs or operations, even if all non-NASA participants are speakers, will not generally satisfy criterion 2).

4. **Was NASA a primary sponsor of the event?**

Even if NASA did not pay any travel costs for a conference, other costs may still be reportable if NASA held (i.e., was primary sponsor of) the event and the total cost was greater than $20,000.

**FAQ 4-1 (non-NASA costs).** If NASA pays for an exhibit booth or otherwise provides a minor level of funding in support of a conference, is the conference considered “held by” NASA (i.e., is NASA a “primary sponsor” of the conference)?

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

5. **Is the total cost to NASA greater than $20,000?**

Even if NASA did not pay any travel costs for a conference, other costs may still be reportable if NASA primarily sponsored the event and the total cost was greater than $20,000.

**FAQ 5-1 (non-NASA costs).** Is NASA required to report on costs incurred by other Federal Agencies?

**Answer:** No. If you have a record of actual costs in connection with a NASA sponsored conference but ultimately paid by another Government agency, you should not report those. For example, if NASA incurred conference costs but charged them back to another Agency via a reimbursable agreement, those costs should not be reported. The Act does not require other Agencies to participate in this reporting, so only those net realized costs shown by NASA’s records need to be reported. For example, fully reimbursable travel arrangements for conference attendance will not count towards the cap; partially reimbursable arrangements will count to the extent of the unreimbursed
expenses. As always, reimbursable travel arrangements must be approved in advance and may not be solicited. Only a valid interagency agreement may be used to support a reduction in the amount obligated by NASA, otherwise amounts are fully reportable against the cap.

If an employee travels to a meeting or other event and also attends a conference on the same trip, NASA must account for the net costs realized and attributable to the conference. In those cases, NASA will determine the percentage of time spent participating in the conference in proportion to the entire trip. The same percentage of the expenses will be counted as conference spending.

6. Is the conference a foreign conference?

Conferences outside of the United States are subject to an additional limitation of no more than 50 NASA employees.

FAQ 6-1 (NASA funds available). If funds are still available within the $5M cap, is there a limit to the number of attendees that can go to a foreign conference?

**Answer:** Yes. In addition to the limit on overall funding for conferences, NASA is also limited to paying for no more than 50 attendees at a foreign conference. Even if the only costs to NASA are indirect (e.g., salary, but all direct costs are paid for by conference sponsor), such attendees still count against the 50 person limit.

FAQ 6-2 (NASA employees). Are JPL employees considered NASA employees?

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

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

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

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

FAQ 7-1 (Approval Steps). I want to go to a meeting that I think is a conference. What steps are now required to get approval, and to submit a voucher for reimbursement, for the travel?

**Answer:** The following steps will be typical for most travel:

1. Determine whether the event is a “conference.”
   a. If you can readily tell it is NOT a conference, then proceed with travel authorization and vouchering as you have always in the past.
   b. In all other cases, go to the NASA Conference Tracking System (NCTS) site (http://ncts.nasa.gov) and search for the event:

2. If the event is listed as a conference, cut and paste the unique conference name/number from NCTS into the trip description field of your travel authorization, and select a trip purpose of “conference.” If a portion of the trip is for non-conference events, add the anticipated proportion of time for the conference in the trip description field.

3. If the event is not listed, submit a New Record in NCTS; the NCTS moderator will send a reply within 1 working day indicating whether the event is a conference or not. All events determined to be a conference will also be added to the conference list. Once notified, follow the steps in 1b above.

4. After attending an approved conference, prepare your travel voucher. For multipurpose travel, annotate your voucher or notify your travel approver of costs attributable to the conference, and the proportion of time attributable to the conference. A travel approver will select the appropriate funds code, but for multipurpose travel you must supply enough information for them to obligate or charge conference-related expenses to an appropriate conference fund code.

5. For travel to a foreign conference, submit your travel authorization to your approver with the correct trip purpose (“Conference”) and trip description (the beginning of this field should always be the unique conference name/number copied from NCTS).
   a. The travel approvers will then register the traveler’s name via an online attendee Request Approval Form, found on NCTS. A request should be timely (at least four weeks before the planned departure date); the Office of External Relations will establish a committee of appropriate representatives to determine appropriate allocations for international conferences that may exceed the 50 Federal employee limit. If approved, the traveler should proceed with the established processes of their Center / Office for foreign travel.
   b. After attending the conference, submit you travel voucher as per step 4 above.

NOTE: new procedures also apply to P-Card and PR charges, and these may also be found at the website, http://conference.nasa.gov.