

# INDIAN AFFAIRS MANUAL

**1.1 Purpose.** The intent of this chapter is to provide guidance on the management of conference related activities and spending for Indian Affairs (IA). This policy implements the U.S. Department of the Interior (DOI) policy memorandums related to Conference Related Activities and Spending, and reemphasizes internal control requirements over conference activities.

**1.2 Scope.** This policy applies to all IA headquarters, field, and program staff under the authority of the Assistant Secretary - Indian Affairs (AS-IA), the Bureau of Indian Affairs (BIA), and the Bureau of Indian Education (BIE). Each bureau and office is required to comply with the procedures contained herein, and to maintain controls to mitigate associated risks with conference activities and spending.

**1.3 Policy.** It is the policy of IA to comply with all government-wide and Departmental specific requirements regarding conference planning and sound financial management practices in such planning. All conferences must be approved by the AS-IA, and then submitted to the Department for final approval. Tribal consultation, although not considered “conferences” or “training,” will adhere to the planning, approval, and review requirements of this policy.

## **1.4 Authority.**

### **A. Statutes and Regulations.**

- 1) 41 CFR 301-74, Conference Planning
- 2) 41 CFR 301, Appendix E, Suggested Guidance for Conference Planning
- 3) 41 CFR 301-50, Arranging for Travel Services
- 4) 5 CFR 410.404, Determining if a Conference is a Training Activity
- 5) P.L. 97-255, Federal Managers Financial Integrity Act (FMFIA)

### **B. Guidance.**

- 1) Executive Order 13589 -- Promoting Efficient Spending, November 9, 2011
- 2) OMB Memorandum M 11-35, Eliminating Excess Conference Spending and Promoting Efficiency in Government, September 21, 2011
- 3) OMB Memorandum M 12-12, Promoting Efficient Spending to Support Agency Operations, May 11, 2012
- 4) OMB Circular A-123, Management’s Responsibility for Internal Controls
- 5) OMB Circular A-123, Appendix A: Internal Control Over Financial Reporting
- 6) DOI Memorandum: Conference Related Activities and Spending, October 13, 2011

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- 7) DOI Memorandum: Guidance on Reporting Conference Related Activities and Spending, June 13, 2012
- 8) DOI Memorandum: Supplemental Guidance for Targeted Internal Control Review of Conference Related Activities and Spending, March 7, 2012
- 9) DOI Financial Management Memorandum 2012-001: Guidance on the Use of GovTrip and SATO, October 11, 2011
- 10) 205 Departmental Manual (DM) 15, Travel and Transportation

## 1.5 General Requirements

IA requires that all appropriate efforts be made to use space controlled by IA or other Federal government agencies wherever practicable and cost-effective.

IA shall not accept compensated benefits offered by hotels and other venues. IA must comply with the Department's guidance that limits the use of promotional items, and ensure all activities support mission-critical needs of IA.

IA shall not incur net expenses greater than \$500,000 from its own funds on a single conference, including conferences we host or sponsor and those hosted or sponsored by other Federal or non-Federal entities. If exceptional circumstances exist, the Secretary of the Interior may provide a waiver from this policy based on the compelling purpose and exceptional circumstances of the conference in question.

The Department and its bureaus and offices are to report publicly all conferences that are in excess of \$100,000 on the official DOI website. The website is also to include information on waivers issued and net conference spending for the fiscal year. By January 31 of each year (beginning January 31, 2013), the site is to report a description of all agency-sponsored conferences from the previous fiscal year where the net expenses were in excess of \$100,000. The information reported is to include the total expenses, location, date, how the conference advanced the Department's mission, and the total number of individuals whose travel expenses or other conference expenses were paid by IA, its bureaus or its offices.

## 1.6 Process.

### A. General

Any IA bureau or office--including all offices reporting to the AS-IA; all BIA Central, Regional, Field and Agency offices; and all BIE Central and Field offices--that plans to host a conference involving 30 or more individuals where 15 or more individuals are in travel status; or for attendance to a conference hosted by another entity where 15 or more IA employees will be attending; or if a conference is expected to cost \$100,000 or more, a

conference approval package must be submitted to the IA Conference Point of Contact (POC).

The IA POC must submit conference requests to the Department's Office of Financial Management (PFM) at least two weeks prior to the start of the conference to allow for appropriate review and approval. Therefore, IA bureaus/offices shall submit their conference approval packages to the IA POC *prior* to committing to host or participate in conferences.

## **B. Annual Plan**

IA must maintain an annual plan of anticipated conference activity for each fiscal year. The annual plan is submitted to PFM at the beginning of the fiscal year and must be updated as plans change throughout the year. The IA POC consolidates all conference activities into the annual plan and maintains any updates. Updates to the plan will be provided quarterly to PFM.

The annual plan should include all conferences IA plans to host for 30 or more individuals, and where 15 or more of the individuals attending will be in travel status; and any conferences hosted by other entities at which 15 or more IA individuals will be attending.

## **C. Conference Justification: Process and Review**

- 1. Evaluation of the Need** - To ensure all appropriate factors have been considered in planning the conference, each conference approval request should contain:
  - a. an agenda for the meeting,
  - b. a cost analysis if multiple locations were considered,
  - c. a listing of the travelers and their estimated travel costs (see section 2. *Costs and Expenses* below), and
  - d. a completed Checklist for Evaluation of Proposed Conference (see Attachment 1). The Checklist is the primary tool used to evaluate conference plan requests.

All IA organizations must be sensitive in the use of Federal funds, ensuring all plans are legal and appropriate relating to food and other expenses; therefore, all funds shall only be expended *after* the approval process is complete.

### **2. Costs and Expenses**

- a. **Estimated Costs** - Estimated costs must be recorded in the Checklist for Evaluation of Proposed Conference with the listing of travelers, place of origin/duty station, travel costs for each, and per diem in accordance with the

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Department's January 23, 2012 memorandum, *Guidance on Reporting Conference Related Activities and Spending*.

- b. **Cost Comparison** - A cost comparison with at least three alternative locations, if available, must be performed.
- c. **Meals & Incidentals** - When meals or light refreshments are provided by the Federal government or included in the registration fees, the applicable Meals & Incidentals Expenses (M&IE) will be calculated as follows (CFR 301-74.21):
  - If meals are furnished, the appropriate deduction from the M&IE rate must be made to the traveler's allowance for M&IE (see CFR §301-11.18).
  - If light refreshments are furnished, no deduction of the M&IE allowance is required.
- d. **Expense Components** – OMB M-12-12 defines conference expenses as "all direct and indirect conference costs paid by the Government, whether paid directly by agencies or reimbursed by agencies to travelers or others associated with the conference, but do not include funds paid under Federal grants to grantees. Conference expenses include any associated authorized travel and per diem expenses, hire of rooms for official business, audiovisual use, light refreshments, registration fees, ground transportation, and other expenses as defined by Federal Travel Regulations."

IA offices and bureaus should use the criteria below, which is based on 41 CFR 301-74.2 when determining conference costs. Specifically, offices and bureaus should include the following costs:

- Authorized travel and per diem expenses;
- Hire of rooms for official business;
- Audiovisual and other equipment usage;
- Computer and telephone access fees;
- Food and beverages;
- Printing;
- Registration fees;
- Speakers travel and fees; and
- Ground transportation.

Federal employee time/salary at the conference, en route travel, and time for conference preparation should *not* be included. In addition, lodging that is over the per diem amount should *not* be included. Conference preparation and planning expenses (excluding Federal employee time) should be included; for example, any contracted support for conference preparation. End user/requestors are highly discouraged from hiring non-Federal conference planners.

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### 3. Approval Chain –

- a. All organizations within IA must obtain approval from the appropriate supervisor/manager before submitting the package to the IA POC.
- b. The IA POC reviews the request package to ensure all appropriate elements and documentation have been considered and included as required; and then provides the request to the AS-IA for approval, disapproval, or a request for a modification.
- c. If the AS-IA approves the package, the IA POC submits the request to PFM. If the AS-IA does not approve the package or needs additional information, the AS-IA works through the IA POC to communicate with the requesting bureau/office.
- d. PFM then makes a recommendation as to final approval/disapproval to the Deputy Assistant Secretary – Budget, Finance, Performance & Acquisition (DAS-BFPA). Disputed conference approvals/disapprovals are elevated to the DOI Deputy Secretary for resolution.
- e. PFM communicates the final determination to the IA Conference POC.
- f. The IA POC communicates the Department’s determination to the requesting IA bureau/office.

Any conference for which IA bureaus or offices (individually or collectively) anticipate spending \$100,000 or more must be approved by the Deputy Secretary.

The Department’s Office of Policy, Management and Budget (PMB) submits a weekly report to the Secretary that contains a list of conferences that have been approved, disapproved or modified.

### 4. Registering to Attend a Conference –

Once a conference has been approved, the IA Conference POC and the IA DOI Learn POC will work together to load the conference information into DOI Learn.

All employees must use DOI Learn to request attendance at a conference or consultation. The employee’s supervisor must approve his/her attendance at a conference/consultation *prior* to generating a travel authorization or obligating funds. The instructions for registering in DOI Learn can be found in Attachment 2.

### **D. Conferences Outside the Allowable Limits**

IA and its bureaus and offices are not to incur net expenses greater than \$500,000 from its own funds on a single conference, including conferences IA hosts or sponsors, and those hosted or sponsored by other Federal or non-Federal entities. If exceptional

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circumstances exist, the Secretary of the Interior may provide a waiver from this policy based on the compelling purpose and exceptional circumstances of the conference.

Waivers will be considered by the Secretary if recommended by the Deputy Secretary and supported by the Solicitor. Bureaus or offices seeking a waiver from this policy must include the following in their conference approval package in addition to the items required in a conference approval package as described above in the section titled *1.6 Process*:

- the rationale for considering the conference in question as having exceptional circumstances and a compelling purpose;
- demonstration that the conference is the most cost-effective option to meet mission needs; and
- the package should include the signature of the bureau/office Chief Acquisition Officer, who has validated that contracting actions for the conference are compliant with Federal Acquisition Regulations.

## 1.7 Responsibilities.

- A. Assistant Secretary - Indian Affairs** Reviews and approves (or disapproves) all IA conference requests, within the guidelines issued by the Department, prior to submission to the Department. These reviews ensure that attendance and expenses are limited to the levels required to carry out the mission of the conference.
- B. IA Office of Internal Evaluation and Assessment (OIEA)** Conducts an annual assessment of the effectiveness of internal controls surrounding the conference approval process during the annual internal control reviews. As the Internal Control Coordinator, OIEA facilitates the annual assessment as well as conducts and submits the results of targeted reviews by the due date(s) as dictated by PFM in its guidance on conference management and spending. OIEA is also responsible for working with IA management and programs to assess and verify that effective internal control, policies, and procedures are in place to monitor conference related activities and spending.
- C. IA Conference POC** Acts as the liaison between IA and the Department. The POC is responsible for tracking conference activity and spending, submitting the annual plan and quarterly updates, and ensures that each conference approval package is complete, reviewed, and approved by the AS-IA, and submitted in a timely manner to the Department.
- D. IA Employees** All IA employees attending a conference shall designate on their GovTrip travel authorization “conference attendance” or “large conference of 30 or more” for their “Trip Purpose.” This includes attendance at *any* conference, whether

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DOI-sponsored or not, or hosted by another DOI bureau or office and includes tribal consultation attendance. In addition, every IA employee shall register through DOI Learn which conference they plan to attend and all IA employee initiated requests will require supervisory approval.

- E. Receiving or Hosting Program (End User/Requestor)** Develops and submits the original conference approval package to the IA POC for all conferences that involve hosting 30 or more individuals where 15 or more individuals are in travel status; attendance to a conference hosted by another entity where 15 or more of the office's employees or end users/requestors will be attending; or if a conference is expected to cost \$100,000 or more.

## 1.8 Definitions.

- A. Conference** is a meeting, retreat, seminar, symposium or event that requires a majority of attendees to travel away from their duty station and be placed in an authorized per diem status. This includes senior leadership meetings and meetings of specific disciplines or initiatives; for example, acquisition, planning, youth, and so forth. Conference approvals from the Deputy Secretary, as delegated to PMB's DAS-BFPA, are required for conferences of 30 or more people, with one-half (15 or more) in travel status. Approvals are also required when bureaus/offices plan to send 15 or more bureau/office employees to an event hosted by another entity.

A conference can involve topical matters of interest to participants, and can be bureau-specific, or can include participation by multiple agencies and/or non-governmental participants. Indicators of a conference include registration, an agenda, discussion and break-out sessions, and scheduled speakers or discussions.

- B. Training** typically involves the process of providing for, and making available to, an employee, and placing or enrolling the employee in a planned, prepared, and coordinated program, course, curriculum, subject, system, or routine of instruction or education, in scientific, professional, technical, mechanical, trade, clerical, fiscal, administrative, or other fields which will improve individual and organizational performance and assist in achieving the agency's mission and performance goals. Formal classroom training, including training at Office of Personnel Management facilities or any of the DOI facilities, is not considered to be a conference.
- C. Consultation** is a deliberative process whereby Federal agencies engage with Indian tribes to collaborate and facilitate informed decision making where all parties share a goal of reaching a decision together. Tribal consultation, although not considered "conferences" or "training," will adhere to the planning, approval, and review requirements of this policy.

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## Attachment 1 – Checklist for Evaluation of Proposed Conference

*Please print and/or save to your computer in order to complete the template*

Bureau(s) / Office(s) Participating: Lead and Others to Participate:	Lead Bureau	Other Bureau	Lead Office	Other Office
Name and Contact Information of Conference Planner:	Contact Name	Contact Email	Contact Phone	
Conference Title/Subject:				
Purpose/Objective (Please submit conference agenda or other conference material):				
Date(s) and Location:				
Estimated Number of Participants:				
Estimated Cost (Conference; Related Travel; Other; and Total): Report the totals here and attach a listing of travelers, place of origin/duty station, travel costs for each, and per diem.	Conference cost	Travel Cost	Other cost	Total Cost

### Attendance Review Check list

1.	Have attendees recently attended similar conferences? Note redundancy vs. supplementary complimentary event.	Yes	No	Comments on Similar Conferences
2.	Have the appropriate attendees been selected? (number and categories)	Yes	No	Comments
3.	Has analysis been done to determine cost effectiveness of conference location?	Yes	No	Comments
3a	Is fee appropriate for conference location?	Yes	No	Comments
3b	Were alternative conference locations considered? Include cost comparison with at least three alternative locations considered if available (Provide Cost Analysis). Was least costly location selected? If not, provide rationale for rejecting less costly alternatives. Note: Not applicable to external hosted conferences.	Yes	No	Comments
3c	Was a Federal government facility selected or considered for host location? Document reason not selected. Note: Not applicable to external hosted conferences.	Yes	No	Comments

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## Checklist for Evaluation of Proposed Conference (continued)

4.	Was the use of video-conferencing technology considered for this conference?	Yes	No	Comments
5.	Is the location within allowable per diem limits?	Yes	No	Comments
5a.	If not, have all requirements to authorize the conference lodging allowance been completed?	Yes	No	Comments
6.	Is the length of conference appropriate?	Yes	No	Comments
7.	Will meals be provided at conference? If so provide details and justification.	Yes	No	Comments
7a.	Have appropriate procedures to decrease per diem for provided meals been put in place?	Yes	No	Comments
8.	Is a meeting/event planner to be used; at what cost? Was review completed to ensure planner does not receive kick-back?	Yes	No	Comments
9.	Are the fees paid to speakers appropriate? Are speakers appropriate for objective of conference? Were credentials verified and suitability checked? Please provide a list of speakers' fees.	Yes	No	Comments
Bureau Reviewer Name		Bureau Reviewer Signature		Date
Assistant Secretary Name		Assistant secretary Signature		Date
PFM Reviewers Name		PFM Reviewer Signature		Date
PFM Reviewer's Conclusion ( Recommended Approval by Deputy Secretary Signature; Recommended Disapproval; or Other)				
Deputy Secretary Approval		Deputy Secretary Disapproval		Date

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## Attachment 2 – Registering for a Conference in DOI Learn

- 1) Log in to DOI Learn (<http://www.doi.gov/doilearn/>).

DOI learn

Login

User ID and password are required. If you need assistance, email: doilearn@sumtotalsystems.com. DOI EMPLOYEES: DO NOT use the Request New Account link below to obtain access. Get more info at: <http://www.doi.gov/doilearn/>.

Note: \*Required Fields.

**Login Form:**

\*Username:

\*Password:

[Forgot your password?](#)  
[Request a new account.](#)

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- 2) In the “Search” box, type the name of the conference you are interested in and click “Go.”

Home

Notes Help Contact Us Log Off

Logged in as: EXAMPLE STUDENT

DOI learn

My Home My Employees

Search: National Irigation

**My Home**

**Announcements**

**NOTICES:**

**ALL DOI FEDERAL EMPLOYEES now have access to the SKILLSOFT Online Library!** A DOI-wide announcement will be coming soon. Please take advantage of this great opportunity! See the Skillssoft info area in the lower right portion of this webpage.

The DOI Office of Strategic Employee and Organization Development is conducting a **DOI-wide Training Needs Assessment**. Participation is optional but encouraged. If you receive an email with the Subject Line: *Department of the Interior Training Needs Assessment - 2012*, please know that the email is legitimate and your participation is appreciated. Thank you!

If you would like to learn more about DOI Learn, please attend one of the monthly DOI Learn interactive webinars. There are two types of webinars, Learner/Supervisor and Administrative Roles. For further details and registration please [click here for the Learner/Supervisor webinar](#) and [here for the Administrative Roles webinar](#).

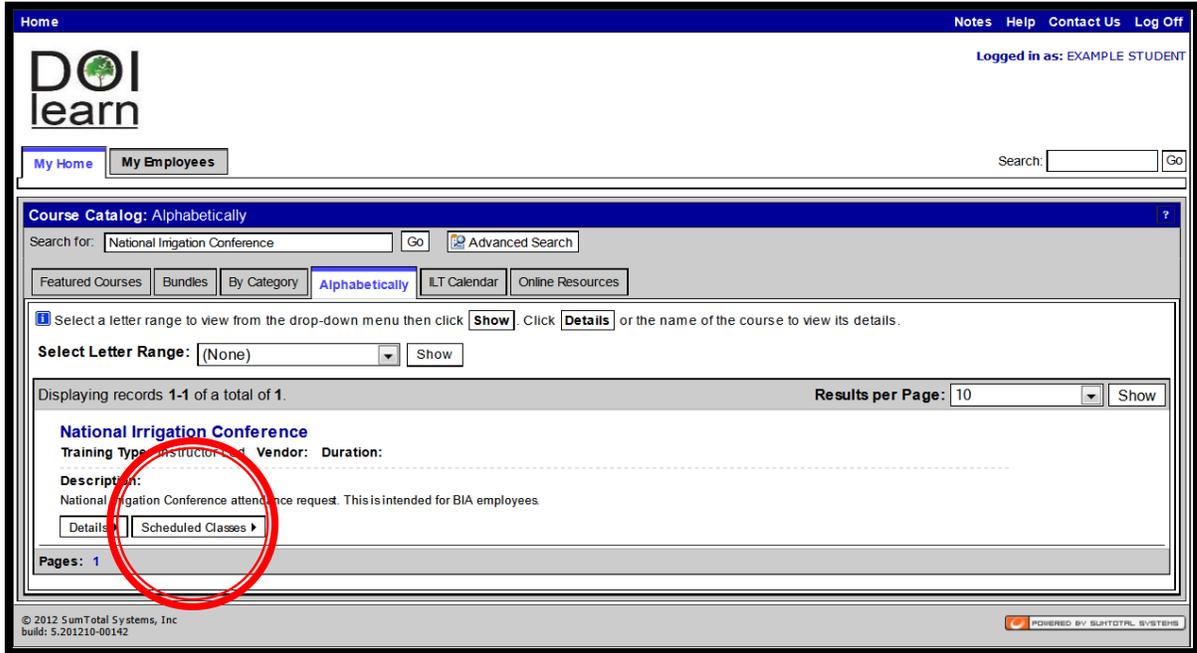
**Wondering Where to Start?**

**My Learning**

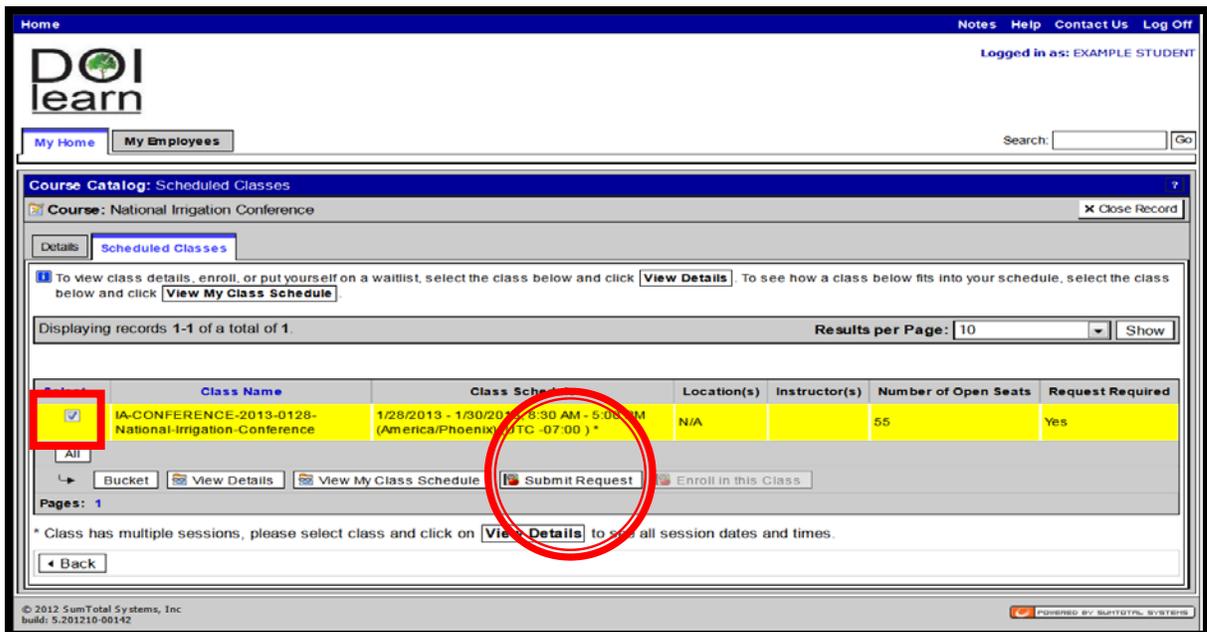
- FBMS Acquisition Receiver Course
- Not Attempted
- Due Date: 10/12/2012

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- When the conference listing appears, click the “Scheduled Classes” button below the conference title.



- When the “Scheduled Classes” tab loads, select the conference session and then click “Submit Request.”



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- 5) After the "Submit Learning Request" page appears, click "Begin."

Home Notes Help Contact Us Log Off  
Logged in as: EXAMPLE STUDENT  
My Home My Employees Search: [ ] Go  
Submit Learning Request Wizard  
Submit Learning Request  
Introduction  
Easily submit a learning request in minutes using this wizard. This 3 step process gives you the control and information you need to fill out a learning request.  
Cancel Begin >  
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- 6) Select the "DOI Employee Training Request" form on the "Select a request form" and click "Next."

Home Notes Help Contact Us Log Off  
Logged in as: EXAMPLE STUDENT  
My Home My Employees Search: [ ] Go  
Submit Learning Request Wizard  
Submit Learning Request  
Select a request form Step 1 of 3  
Select a form from the table below.  
Request Forms  
Select Name Description  
DOI Employee Training Request For use by DOI Fed employees and Interns. This form requires a single level of approval. This request will be submitted to anyone listed in the My Supervisors tab in your profile. After submission, this form can be printed for additional payment information.  
Cancel Previous Next >  
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- 7) On the "Request Fields" page, set "Is this course part of your IDP?" to "No."
- 8) Select a payment method from the "Method of Payment" dropdown. For almost all conferences, this should be set to "No Payment Required."
- 9) Click "Next" to continue.

Home Notes Help Contact Us Log Off  
Logged in as: EXAMPLE STUDENT

DOILearn

My Home My Employees Search: [ ] Go

### Submit Learning Request Wizard

## Submit Learning Request

Request Fields Step 2 of 3

Please confirm the field information below. Select **Next** to continue.  
If there is no information to confirm, click **Next**.

**Request Fields:**

User Name Example.Student  
First Name EXAMPLE  
Last Name STUDENT  
Course Title National Irrigation Conference  
Course Code BIA-CONFERENCE-National-Irrigation-Conference  
Responsible Bureau Bureau of Indian Affairs  
Class Name IA-CONFERENCE-2013-0128-National-Irrigation-Conference  
Class Start Date 1/28/2013 8:30 AM (America/Phoenix)  
Class End Date 1/30/2013 5:00 PM (America/Phoenix)  
Approximate Duration 0  
Class Vendor  
Class Cost to Learner 0.00  
Class Description National Irrigation Conference

Special Class Information 1  
Special Class Information 2  
Special Class Information 3

\*Is this course part of your IDP? No

Class Payment Information  
Method of Payment No Payment Required

Special Billing Notes (NOT for Credit Card INFO)  
Class Location

Cancel Previous Next

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- 10) On the "Confirm Information Entered" page, review your conference request information and then click "Save."

Home Notes Help Contact Us Log Off

Logged in as: EXAMPLE STUDENT

DOILearn

My Home My Employees Search: [ ] Go

### Submit Learning Request Wizard

## Submit Learning Request

Confirm Information Entered Step 3 of 3

Please review the information you provided below. To make changes, click **Previous** to go back to the appropriate step. Click **Save** to submit for approval.

**Field Information**

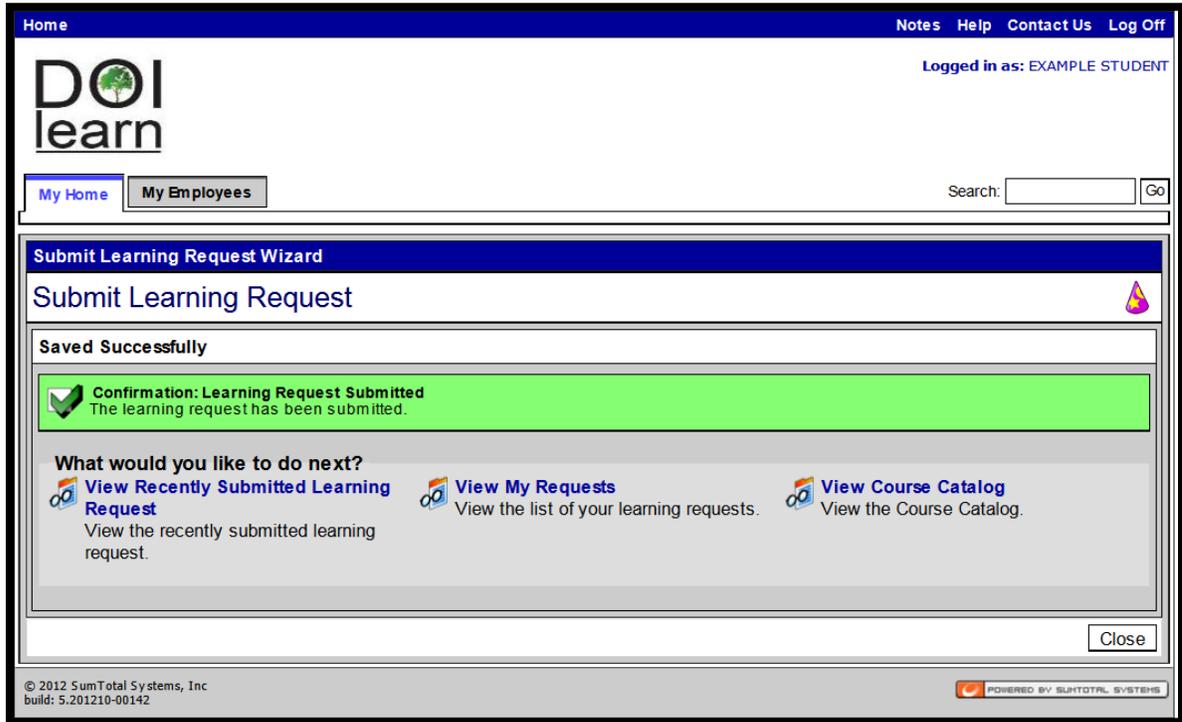
**User Name:** Example.Student  
**First Name:** EXAMPLE  
**Last Name:** STUDENT  
**Course Title:** National Irrigation Conference  
**Course Code:** BIA-CONFERENCE-National-Irrigation-Conference  
**Responsible Bureau:** Bureau of Indian Affairs  
**Class Name:** IA-CONFERENCE-2013-0128-National-Irrigation-Conference  
**Class Start Date:** 1/28/2013 8:30 AM (America/Phoenix)  
**Class End Date:** 1/30/2013 5:00 PM (America/Phoenix)  
**Approximate Duration:** 0  
**Class Vendor:**  
**Class Cost to Learner:** 0.00  
**Class Description:** National Irrigation Conference  
**Special Class Information 1:**  
**Special Class Information 2:**  
**Special Class Information 3:**  
**Is this course part of your IDP?:** No  
**Class Payment Information:**  
**Method of Payment:** No Payment Required  
**Special Billing Notes (NOT for Credit Card INFO):**  
**Class Location:**

Cancel Previous Save

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- 11) When your conference attendance request is successfully saved, your supervisor will receive a request for approval.



- 12) Once your supervisor approves the request, the process is complete and you are approved to attend the conference.