National Aeronautics and
Space Administration
Office of the Administrator
Washington, DC 20546-0001

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TO: Officials-in-Charge of Headquarters Offices
Directors, NASA Centers

FROM: Administrator

SUBJECT: Planning Agency-Sponsored Events

Each year, NASA plans and hosts numerous events including conferences, retreats, award ceremonies, and off-site training, all of which are important to furthering the Agency's mission. As a Federal agency, however, NASA is subject to rules that do not similarly restrict private entities with regard to planning and paying for such events. Equally important, all of us at NASA are responsible and accountable for the prudent stewardship of taxpayer resources. This memorandum provides guidance on accounting for the fiscal, travel, ethics, and appearance issues which must be considered when planning Agency-sponsored events.

Funding

When planning an event, NASA employees should determine that appropriated funds are available and should ensure that the total cost of the event does not exceed that amount. The Federal Travel Regulations (FTR) set out agency responsibilities for planning conferences, including required cost comparisons and cost considerations when selecting a site, attendees, and lodging (http://www.access.gpo.gov/nara/cfr/waisidx_05/41cfr301-74_05.html). The NASA supplement to those regulations gives additional guidance and can be viewed at (http://www.hq.nasa.gov/fmm/9700/9700.pdf). Consult the Office of the Center Chief Financial Officer (Center CFO) regarding the permissibility of event expenses before they are incurred. This same analysis should be undertaken for other similar events, such as retreats and certain types of training.

The appropriated funding should not be supplemented with conference fees, exhibitor fees, attendance fees, or sponsorship fees from other persons or entities. In addition, NASA contractors or other non-NASA entities may not be solicited to contribute to NASA events. Depending on the specific factual scenarios, the Agency may have some avenues for sharing the financial burden of an event. NASA employees, however, should not enter into partnership agreements or structure any event to allow for acceptance of fees or services, prior to seeking advice from their Center CFO and Chief Counsel's offices.

Further, NASA contractors may not be used to accomplish what the Agency itself may not undertake. Accordingly, conference planners may not collect fees as a method of offsetting

the amount the Agency must pay to host a conference. Prior to retaining a professional conference planner, the Agency should also ensure that enough appropriated funds are available to pay the contractor's costs.

Selecting a Location

When planning an event, employees should select sites that are cost effective. The FTR sets out a cost analysis that an agency must perform when selecting a conference location. The regulations require that agencies evaluate three potential conference sites and maintain a record of the site cost comparison. The NASA supplement also contains a required form which serves both as a record of approval to conduct the conference and a record of the site cost comparison required by the FTR.

When planning a conference, all direct and indirect costs to the Government should be considered. Examples of such costs include travel and per diem expenses, lodging rates, and ground transportation. In addition, Government-owned facilities, including NASA Centers, should be considered as event locations if suitable facilities are available. Sites within 25 miles of a NASA Center are preferable, since not all attendees would then require hotel accommodations.

Aside from cost considerations, employees must be conscious of appearance concerns when selecting an event location. Selecting sites in exotic or resort destinations may create the appearance that the event is wasting Government resources in order to facilitate personal vacations or entertainment for employees. Employees should take care to select event locations that are cost justified, appropriate to the purpose of the event, and which minimize, to the greatest extent possible, any appearance of impropriety.

Food, Refreshments, and Entertainment

NASA may use appropriated funds for meals or entertainment only in certain limited circumstances. In the case of a formal, NASA-hosted conference, meals and refreshments may be served when:

1. The meals and refreshments are incidental to the conference.

2. Attendance at the meals and during the refreshments is important for NASA to ensure the full participation of attendees in essential discussions, lectures, or speeches concerning the purpose of the conference.

3. Substantial conference functions also are occurring separately from when food is served.

A "formal" conference is one that includes: topical matters of interest; the participation of multiple agencies and/or nongovernmental participants; a published substantive agenda; registration; and scheduled speakers or discussion panels. Meetings that discuss business matters internal to NASA or other topics having little relevance outside the Agency do not constitute formal conferences and, in most cases, meals and refreshments may not be provided for these types of events using appropriated funds. In all cases, employees should consult their Center CFO and Chief Counsel's office to determine if appropriated funds may be used.

Sponsorship by Outside Entities

NASA employees should not enter into sponsorship arrangements with outside entities or persons for meals, refreshments, or entertainment for Agency events without prior consultation with their Center CFO and Chief Counsel's offices. Outside sponsorship does not become allowable simply because appropriated funds are not available for those purposes for a particular event. Corporate sponsorship often raises appearance or gift issues that must be fully reviewed. In addition, NASA contractors or other non-NASA entities may not be solicited to contribute to these aspects of NASA events.

Employees planning Agency events should also be cognizant of the appearance concerns inherent in some forms of collateral entertainment, such as golf tournaments, hospitality suites, and on-site gambling facilities. These events may contribute to a public perception that Federal funds are being used inappropriately. Care should be taken to schedule such events during off-duty hours and to clarify that attendees must cover their own costs for these activities.

Attendees and Speakers

Appropriated funds may be used to purchase items for attendees that are necessary for the proper functioning of a conference, such as nametags, notepads, and pens. As a general rule, appropriated funds may not be used to purchase tokens, gifts, or souvenirs for distribution at a NASA event. This rule applies equally to Federal employees and invited speakers or other outside persons. Official representation funds may be used for presentation items to non-NASA speakers if the requirements of NPD and NPR 9050.1A are met. NASA has relied on its statutory authority to disseminate information as a basis to purchase and distribute items of nominal value such as bookmarks and posters that provide information about science, NASA programs, or NASA missions. These types of inexpensive, informational items may be distributed at a NASA event if appropriate for the particular audience.

Advertising

NASA employees will necessarily use various methods to publicize an event. In doing so, Agency employees should avoid steps that give the appearance that the Agency is endorsing an outside entity, such as posting corporate logos on a NASA website. In addition, the NASA insignia ("the NASA Meatball") may be used only in accordance with Federal regulations and with the approval of the NASA Public Affairs Office. Outside entities are not allowed to use the NASA Meatball without first obtaining permission from NASA Headquarters to do so.

In addition to the above guidelines, I ask all NASA managers to use sound judgment when considering holding a conference or event in the current resource-strained environment. Always ask yourself if the benefits of holding an event outweigh the commitment of resources such an event will entail. Our responsibilities, as stewards of the taxpayers' dollars, require that we do nothing less.

Michael D. Griffin