



**U.S. Department of  
Transportation**

Office of the  
Secretary  
of Transportation

# ORDER

DOT 2300.9A

08-10-2023

Subject: DEPARTMENT OF TRANSPORTATION CONFERENCE POLICY

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1. **PURPOSE:** This Order provides the U.S. Department of Transportation (DOT) with policy and guidance on conference oversight and reporting. DOT-wide adherence to these requirements will achieve compliance with all applicable Office of Management and Budget (OMB) memoranda, Federal Travel Regulation (FTR), appropriations laws, and other guidance relating to conferences. The FTR does not apply to the Federal Aviation Administration (FAA), which has an independent personnel system under Title 49 of the United States Code. This Order also establishes standards that will help ensure that conference activity across DOT is managed with fiscal prudence.
2. **CANCELLATION:** This Order cancels the previous DOT policy and guidance on conference planning and reporting included in the following memoranda:
  - a. Department of Transportation Conference Policy (DOT Order 2300.9 dated 03-22-2022).
3. **BACKGROUND:** The sharing of information and ideas at conferences can play a valuable role to DOT employees in helping to carry out our mission. However, all agencies have a responsibility to act as responsible stewards of taxpayer dollars, ensuring that Federal funds are used for purposes that are appropriate, cost-effective, essential to their core mission, and consistent with law.

In 2012, OMB issued Memorandum M-12-12, “Promoting Efficient Spending to Support Agency Operations,” which outlined a series of practical steps agencies could take to improve operations, increase efficiency, and cut unnecessary spending. In an amending policy, Memorandum M-17-08, and subsequently in Memorandum M-17-26, OMB acknowledged the level of burden the previous policy imposed on Federal agencies and the difficulties of balancing transparency, conference approval, and reporting requirements with achieving agency mission. Therefore, M-17-08 and M-17-26 refined agencies’ focus on the oversight of expenses related to Federally-sponsored and Federally-hosted conferences; modified conference approval thresholds; and proposed revised conference reporting requirements that were later enacted in the Consolidated Appropriations Act, 2021 and repeated in subsequent appropriations acts, including the Consolidated Appropriations Act, 2023.

4. REFERENCES: This Order is issued pursuant to the following statute, regulations and guidance:
- a. [OMB Memorandum 17-26, “Reducing Burden for Federal Agencies by Rescinding and Modifying OMB Memoranda,” June 15, 2017](#): Proposed changes to conference reporting requirements.
  - b. [Federal Travel Regulation Conference Guidance](#): Clarifies the term “conference” as defined by the FTR for reporting requirement purposes. General Service Administration’s (GSA) FTR Supplemental Guidance can be found at [FTR Appendix E, Suggested Guidance for Conference Planning](#).
  - c. [Consolidated Appropriations Act, 2023](#): Pub. L. 116-260, Division E, Title VII., Sec. 738(a) requires submission of annual reports to the Office of Inspector General (OIG) or the Designated Agency Ethics Official (DAEO) regarding the costs and contracting procedures related to each conference held by an agency during the fiscal year 2023, for which the cost was more than \$100,000. Sec. 738(c) requires notification to the OIG or the DAEO within 15 days after the end of a quarter, the date, location and number of employees attending a conference held by any Executive Branch department for which the cost was more than \$20,000.
  - d. [DOT M 1500.6B, DOT Travel Order and Manual, March 29, 2018](#): Established DOT policy and guidance on all aspects of federal travel.
  - e. [DOT 2770.1F, Official Reception and Representation Expenses](#): Established DOT policy and guidance on reception and representation expenses.
  - f. [FTR 41 C.F.R. Subchapter 301, Part-74.1, Conference Planning: GSA conference planning - Agency Responsibilities GSA](#) FTR, 41 CFR Chapter 301, Part-74.1, Conference Planning and FTR Appendix E – to Chapter 301- Suggested Guidance for Conference Planning.
  - g. [General Records Schedules \(GRS\) | National Archives](#): [National Archives and Records Administration](#): General Records Schedule Transmittal 31, April 2020, Disposition Authority (DAA GRS 2013 0003 0001).
5. DEFINITIONS:
- a. Approving/Authorizing Official (AO): An AO is the approving or authorizing official at the operational level who has the responsibility for the mission and the authority to commit program funds for conference costs and to obligate funds to support temporary duty assignment (TDY) travel for the mission. The AO only authorizes travel necessary to accomplish the mission of the Federal Government.
  - b. Conference: A meeting, retreat, seminar, symposium, or event that involves attendee travel (includes virtual or a hybrid combination of the examples below). The term “conference” also applies to training activities that are considered to be conferences under 5 CFR 410.404. See 41 CFR 300-3.1 events. Examples include, but are not limited to:
    - 1) Exchange of Information
    - 2) Outreach
    - 3) Workshops
    - 4) Showcases
    - 5) Committee MeetingsIndicators that an event may be considered a conference are:

- 1) Participant registration;
  - 2) A published, substantive agenda; and
  - 3) Scheduled speakers or discussion panels on a particular topic(s).
- c. Hosted/Co-Hosted: An event in which a DOT Secretarial Office or Operating Administration (OA) is providing full or partial financial support and has control or shares control of all or significant portions of the conference and includes conferences statutorily or legally mandated. In limited circumstances, a DOT Secretarial Office or OA will employ a contractor as a “conference planner” to manage the logistics of the event.
- d. Invitational Travel: Authorized travel of individuals either not employed or employed (under 5 U.S.C. § 5703) intermittently in Federal Government service as consultants or experts and paid on a daily, when-actually-employed basis. Furthermore, this includes authorized travel for individuals serving without pay or at \$1 a year when acting in a capacity that is directly related to official activities of the Federal Government. Travel allowances authorized for such persons are the same as those normally authorized for travelers in a TDY status.
- e. Sponsored/Co-Sponsored: An external conference, organized by both a Federal and Non-Federal entity to advance the mission of the Federal entity utilizing shared interest, where a DOT Secretarial Office or OA provides full or partial financial support through any contracting vehicle or in-kind (non-monetary) services and where DOT’s name is being used in association with the event. For these conferences, the co-sponsors should share responsibility for the agenda planning, conference logistics, speakers, and location selection. In all cases, there must be a clear benefit to DOT commensurate with the funding provided.
6. POLICY: This Order applies to all Secretarial Offices and DOT OAs per DOT Order 1320.16C, “U.S. Department of Transportation Directives System.”

DOT’s Chief Financial Officer and Assistant Secretary for Budget and Programs directs Secretarial Offices and DOT OAs to follow policy and guidance as described in this Order. Secretarial Offices and DOT OAs are responsible for adhering to DOT’s policy, and that appropriate internal controls are developed to support a well-managed conference program.

- a. Use of Government Funds: Appropriated funds may be used to pay for some conference expenses, including both virtual and in-person, as long as the Department and OA determine that the conference is reasonably and logically related to carrying out its mission and is consistent with appropriations laws.

Federal funds shall not be used for certain unauthorized expenses, revenue, or gifts associated with the conference to cover entertainment-related expenses or the cost of amenities. Examples of such unauthorized expenses include motivational speakers, musicians or other entertainers, extraneous promotional items, decorations, or other goods and services for participants unrelated to the purpose of the conference, including tickets to recreational activities outside of the conference setting.

The number of Federal Government attendees shall be limited to the minimum number of employees necessary to achieve the mission and goals of the conference and be in

compliance with all authorities and guidance. OAs must ensure they meet the special requirements for sponsoring or funding a conference at a venue in accordance with 15 U.S.C. § 2225(a), and this requirement can only be waived by the Secretary or the Secretary's designee.<sup>1</sup>

- b. Food and Refreshments: Pursuant to 31 U.S.C. § 1345, an appropriation may not be used for travel, transportation, and subsistence expenses for a meeting, except when an agency is paying the expenses of an officer or employee of the Federal Government carrying out an official duty and on approved official travel.

In certain instances, food and refreshments may be purchased using reception and representation funds (R&R) or Mutual Educational and Cultural Exchange Act (MECEA) funds. DOT Official Reception and Representation Expenses policy can be found in DOT Order 2770.1F and at 49 U.S.C. § 1657(m).

Certain other limited exceptions may allow for the purchase of food for conferences. OAs should consult with legal counsel before using appropriated funds to purchase food or refreshments.

If statutorily-authorized and approved, agencies sponsoring a conference may provide light refreshments to agency employees in attendance. Light refreshments should be negotiated with the hotel or venue to be as close as possible to the meal and incidental expenses rates for individual meals as set out by the FTR. Light refreshments for morning, afternoon, or evening breaks are defined to include, but not be limited to: coffee, tea, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips, or muffins.<sup>2</sup>

Appropriated funds cannot be used to purchase alcohol. Exceptions to the general prohibition are the use of R&R funds (i.e., when protocol demands serving alcoholic beverages to international visitors pursuant to DOT 2770.1F) or funds authorized under MECEA.

- c. Per Diem Adjustments for Furnished Meals: In accordance with the DOT Travel Manual, food may be provided to those on official travel; however, the traveler's per diem must be adjusted to account for the meal(s) furnished. It is the responsibility of the traveler's AO to ensure, prior to reimbursement to the traveler, that such adjustments are made to the travel voucher.
- d. Contract Conference Planner: In limited instances, DOT OAs may contract with a conference planner through traditional methods where funds are obligated and paid to the contractor for its services. In keeping with reducing excessive conference spending, conference planner costs should be kept within an appropriate amount as defined by DOT OAs.

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<sup>1</sup> FTR § 301-74.9

<sup>2</sup> FTR § 301-74.7

- e. Collecting Attendance Fees: The Federal Government must have specific statutory authority to charge and retain attendance fees from outside sources. There is no Department-wide authority to retain fees; however, individual DOT OAs may have specific authorities which authorize them to collect and retain fees.

An attendance fee may be charged by a non-Federal entity co-sponsoring an event provided the fee does not exceed what will cover the reasonable costs incurred by the non-Federal entity in sponsoring the conference.

Questions on this topic should be addressed to DOT Office of the General Counsel or OA's legal counsel before charging, collecting or retaining attendance fees from outside sources.

- f. Non-Federal Attendee Travel Restrictions: Absent specific statutory authority, the Federal Government is prohibited from paying the travel expenses of Non-Federal participants attending meetings per 31 U.S.C. § 1345. However, if an individual provides a direct service to the Federal Government (e.g., speaking at an event), the individual may be placed on invitational travel orders pursuant to 5 U.S.C. § 5703. In addition, a DOT OA may have unique statutory authorities that authorize them to use their appropriated funds for travel and other expenses of Non-Federal employees. Any such authority must be specific (i.e., general training and technical assistance authority are not enough). Statutorily required (rather than merely authorized) conferences may provide sufficient specificity. If a DOT Office or OA believes that it has such authority, it should consult with its legal counsel prior to relying on the authority.

## 7. CONFERENCE PLANNING:

- a. When planning a conference, OAs and Departmental Offices must:
  - 1) Minimize all conference costs, including administrative costs, conference attendees' travel costs, and conference attendees' time costs;
  - 2) Maximize the use of Government-owned or Government provided conference facilities;
  - 3) Identify opportunities to reduce costs in selecting a particular conference location and facility (e.g., through the availability of lower rates during the off-season at a site with seasonal rates);
  - 4) Ensure that the conference planner or designee does not retain for personal use any promotional benefits or materials received from a travel service provider (e.g., hotel points, airline miles, etc.) as a result of booking the conference (see FTR §301-53.2 and 301-53.3); and
  - 5) Develop and establish internal policies to ensure these standards are met.<sup>3</sup>

DOT and OA offices should ensure, to the maximum extent practicable, that appropriate personnel, physical, information, and information technology security and privacy-protective measures are identified and cost-effectively implemented.

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<sup>3</sup> FTR § 301-74.1

b. When planning a conference, OAs should consider all direct and indirect conference costs paid by the Federal Government, whether paid directly by agencies or reimbursed by agencies to travelers or others associated with the conference. Some examples of such costs are:

- 1) Authorized travel and per diem expenses;
- 2) Hire of rooms for official business;
- 3) Audiovisual and other equipment usage;
- 4) Computer, internet, and telephone access fees;
- 5) Light refreshments;
- 6) Printing;
- 7) Fees for sign language and/or captioning services;
- 8) Registration fees; and
- 9) Ground transportation.

DOT OAs should consider other costs related to conference scheduling, facilitation, presentation services, physical and personnel security requirements, cybersecurity, and privacy review controls and services. OAs should consider employees' time at the conference and en-route travel in their conference planning, but are not required to include these in their cost calculations.

c. To determine conference expenditures for Federally-hosted/co-hosted events, DOT OAs must:

- 1) Ensure there is appropriate management oversight of the conference planning process;
- 2) Complete cost comparisons of the size, scope, and location of the proposed conference. Cost comparisons should include, but not be limited to, a determination of adequacy of lodging rooms at the established per diem rates, overall convenience of the conference location, fees, availability of meeting space, equipment, supplies, and commuting or travel distance of attendees;<sup>4</sup>
- 3) Determine if a Federal Government facility is available at a cheaper rate than a commercial facility;
- 4) Consider alternatives to an in-person conference, (e.g., teleconferencing through virtual platforms); and
- 5) Maintain written documentation of the alternatives considered and the selection rationale used.

d. Site selection is a final decision as to where to hold the conference. The term "site" refers to both the geographical location and the specific facility(ies) selected. In determining the best site in the interest of the Federal Government, you should exercise strict fiscal responsibility to minimize costs. The actions in [§ FTR 301-74.4](#) should be included in the cost comparisons. As part of the cost comparison host for Federally hosted/co-host events, you must use the established per diem rate for the locations for which you are comparing costs.<sup>5</sup>

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<sup>4</sup> FTR § 301-74.5

<sup>5</sup> FTR § 301-74.5

- e. DOT must offer reasonable accommodations for all attendees and ensure that the conference and any materials provided are in accessible formats and sign language interpreters. Any invitation to a conference must include the sentence following statement: “The U.S. Department of Transportation is committed to providing equal access to event for all participants. To request alternative formats or reasonable accommodations for this event, please contact:
  - 1) Name for reasonable accommodation point of contact
  - 2) Email address
  - 3) Phone number
  - 4) Your request by deadline.

Information about requesting accommodations should also be included in any registration tool or website and on the event’s website.” Attendees should also be provided with a date by which accommodations should be requested to ensure that the request may be fulfilled in time for the event.

8. CONFERENCE APPROVALS:

a. Conference Approval Authority:

Threshold Value	Required Approvals
$\geq$ \$500K <i>(Estimated)</i>	Deputy Secretary of Transportation or Secretarial designee
$\geq$ \$20K - < \$500K <i>(Estimated)</i>	OA Administrator, or OA Administrator designee OA Chief Financial Officer or OA Chief Financial Officer designee

b. Thresholds:

1) Approval for Events Estimated Greater Than or Equal to \$500,000:

The Deputy Secretary or Secretarial designee is required to review and approve in advance each conference for which a DOT OA’s conference expenses are estimated to equal or exceed \$500,000.

In addition to the approval request for single conferences exceeding \$500,000, OA Management must submit a written justification demonstrating the expense is the most cost-effective option to achieve a compelling purpose.

2) Approval for Events Estimated Greater Than or Equal to \$20,000 but Less Than \$500,000:

Conferences with expenses estimated to be greater than or equal to \$20,000 but less than \$500,000 require review and approval by the OA Administrator, OA CFO, or OA CFO designee. DOT OAs must implement and uphold robust internal conference

procedures to ensure such events are internally approved and appropriate conference files are maintained.<sup>6</sup>

c. Conference Approval Packages:

For conferences with estimated expenses equal to or greater than \$500,000, OAs must submit a complete approval package to the Office of Financial Management (OFM) through the Executive Secretariat no later than 45 business days prior to the conference start date and before the approval is required. OAs must ensure the package is clear, concise, error-free (no spelling or mathematical errors, dollar amounts on all documentation are properly estimated and accumulated), and contains the appropriate OA-level approvals. A complete conference pre-approval package must contain the following:

- 1) OA Management Approval Memorandum;
- 2) Conference Synopsis;
- 3) Cost Estimate and Breakdown;
- 4) An estimate of local and non-local OA attendees;
- 5) Evidence that attempts were made to secure a competitively-priced venue; and
- 6) Conference Agenda.

Conference packages submitted fewer than 45 days from the start of the event must include an explanation for the late submission. This information should be included in the OA Management Approval Memorandum. Conference packages that are late or incomplete may not be approved and may result in cancellation.

No contracts should be awarded unless the Deputy Secretary or Secretarial designee has approved the event; however, the contracting process may begin but may not result in an award until after formal approval.

9. RESPONSIBILITIES:

- a. CFO and Assistant Secretary for Budget and Programs: Establishes and maintains the policy contained in this Order.
- b. Office of the Secretary of Transportation, OFM: Manages DOT's conference policies and approval and reporting processes for DOT.

In managing DOT conference approval and reporting, OFM:

- 1) Reviews conference packages requiring OST approval;
- 2) Consolidates and submits DOT conference data per reporting requirements; and
- 3) Establishes and manages DOT-wide policy and internal controls for conference travel and delegates travel management duties to the designated OA travel management officials.

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<sup>6</sup> FTR § 301-74.14



- c. DOT OA CFOs: Ensure the Department's policies are upheld, and internal guidance and controls are developed to support a well-managed conference program. In addition, ensure OA is adhering to the FTR Part 301.74 Conference Planning. OA CFOs must submit a package for each conference for approval by the Deputy Secretary or Secretarial designee for conferences over \$500,000 as outlined in this Order. DOT OA CFOs must not proceed with a conference until the Deputy Secretary or Secretarial designee has authorized approval.

Conferences with expenses estimated to be greater than or equal to \$20,000 but less than \$500,000 require review and approval by the OA Administrator, OA CFO, or OA CFO designee and must be approved before making any final arrangements. OA CFOs are also responsible for ensuring:

- 1) Adherence to the threshold guidance (Section 8.b.);
  - 2) The approval process follows the procedures outlined in this Order (Section 8.c.);
  - 3) Proper use of Government funds (Section 6.a.);
  - 4) Adherence to reporting guidance (Section 9);
  - 5) Proper use of internal controls (Section 10); and
  - 6) Appropriate legal review and approval when necessary.
- d. AO: Determines whether travel is necessary and that the most economical means of transportation and lodging are being utilized and determines whether travel is necessary based on agency mission needs. The AO:
- 1) Authorizes conference TDY in advance;
  - 2) Ensures compliance with conference and DOT Travel Orders and;
  - 3) Examines travel authorizations and vouchers to ensure compliance with the FTR (as applicable) and DOT policy on receipts and applicable justifications/supporting documentation. OAs may have an additional reviewer.
- e. Travelers: Adhere to the procedures set forth in this Order and other applicable DOT Orders, the FTR, DOT memoranda on related topics, and other applicable OA guidance.
- f. Assistant Secretary for Administration, Office of Security: Reviews and approves hosted/co-hosted conference packages for appropriate physical and personnel security requirements.
- g. Assistant Secretary for Administration, Office of the Chief Information Officer: Reviews and approves hosted/co-hosted conference packages for appropriate cybersecurity and privacy requirements.

#### 10. REPORTING AND RECORD RETENTION:

- a. Annual Office of Inspector General (OIG) Report: To fulfill the reporting requirement of the Consolidated Appropriations Act, 2023, Division E, Title VII, Sec. 738(a), on an annual basis, Executive Branch Departments are required to report to the OIG regarding the costs and contracting procedures related to each conference held during the fiscal year for which

the cost to the United States Government was more than \$100,000. OFM will collect this information from the DOT OAs and submit one report to the OIG annually.

- b. Quarterly OIG Reports: The Consolidated Appropriations Act, 2023, Division E, Title VII, Sec. 738(c), requires the head of any department to notify the OIG of the date, location, and the number of employees attending a conference held by the department for which the cost to the United States Government was more than \$20,000. This notification is due to the OIG within 15 days after the end of a quarter; therefore, OFM will collect this information from the DOT OAs within 10 days after the end of a quarter.
- c. Record Retention: For each conference that a DOT Secretarial Office or OA sponsors, funds, hosts, or co-hosts for 30 or more attendees, the hosting office or OA must maintain a record of the cost of each alternative conference site considered. The OA must consider at least three sites, and must make these records available for inspection by the OIG or other interested parties.<sup>7</sup>

OAs are encouraged to retain all conference records to validate costs, estimates, and policy compliance, regardless of the cost, reporting, or attendee threshold.

- 11. INTERNAL CONTROLS: DOT OAs must implement an internal conference policy to ensure all conferences are internally approved and appropriate conference documentation is maintained. Additionally, DOT must annually validate that the proper controls are established and operating effectively as part of the departmental OMB- Circular A-123 travel internal control testing.

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Victoria Wassmer  
Assistant Secretary for Budget and Programs  
and Chief Financial Officer

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Date

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<sup>7</sup> FTR § 301-74.14