

OVW Conference Costs Guidelines

This chapter provides guidelines and policies on conference planning, minimization of costs, and conference cost approval and reporting requirements. These guidelines have been established to assist OVW grant and cooperative agreement award recipients in the planning of meetings and conferences. These guidelines are intended to help minimize the cost of conferences that are funded with OVW funds. Included in these guidelines is information that will assist recipients in planning a conference and establish limits on the allowable costs at conferences. Also, we have provided information on the DOJ approval process for DOJ sponsored meetings and conferences as well as on the conference cost reporting that takes place after a conference has been held.

The guidelines in this section apply to all OVW award recipients, including recipients of grants, cooperative agreements, and contracts. All award recipients are subject to monitoring and should maintain all necessary documentation to support any conference costs or food and beverage expenses. Recipients are encouraged to identify alternative training methods (e.g. webinars, teleconferences, etc.), acquire lower cost locations and venues, and avoid the appearance of extravagant spending. While all award recipients must comply with the guidelines contained in this section, only recipients of cooperative agreements and contracts are subject to prior approval and reporting requirements for their conferences, meetings, and events. While grant recipients are not specifically required to obtain prior approval and report on their conferences, meetings and events, they are still responsible for following the guidelines contained herein.

A **conference** is defined as a meeting, retreat, seminar, symposium, or training activity. A conference is typically a prearranged event with designated participants and/or registration, a published substantive agenda, and scheduled speakers or discussion panels on a particular topic.

OVW “sponsored” conferences must comply with all guidance included in this chapter and must receive prior approval. The OVW funds used to pay for costs of an OVW “supported” conference must comply with the cost guidelines outlined in this chapter. In addition, any OVW “supported” conference for which OVW’s estimated cost would exceed \$20,000 must also receive prior approval. All OVW “sponsored” and “supported” conferences that have final costs in excess of \$20,000 must comply with the reporting requirements.

An **OVW-sponsored conference** means any conference planned and conducted by an OVW cooperative agreement or contract recipient. With respect to conferences where the OVW cooperative agreement or contract provides part of the funding and the rest of the funding is provided by one or more other federal agencies or non-federal entities, the conference is considered OVW-sponsored if the OVW cooperative agreement or contract provides more funding than any other agency or entity and controls a majority of the conference.

An **OVW-supported conference** is a conference where an OVW cooperative agreement or contract supplements a conference sponsored by another entity. In the case of an OVW-supported conference, OVW cooperative agreement or contract funds represent less than 50% of the total costs of the conference, do not constitute the largest supporter of the conference, and do not control the conference.

For the purpose of this policy, the following types of meetings and events do not qualify as conferences and therefore do not need to be approved or reported as described in this chapter:

- Video conferences and webinars where there are no costs for logistical conference planning (beyond incidental expenses necessary for webinar set-up and registration of participants) or food/beverages.
- Routine operational meetings and technical assistance/site visits held in a facility that does not charge for its use, so long as there are no costs for logistical conference planning or food/beverages. A **routine operational meeting** generally focuses on the organization's day-to-day operations and concerns (e.g., staff meetings, all hands meetings), is attended overwhelmingly by internal staff to the organization holding the meeting, and typically does not have a formal published agenda, scheduled speakers or discussion panels. **Technical assistance visit** means travel by an individual or a small group to provide training or technical assistance to a particular entity, where there are no costs for meeting rooms or conference logistical planning. Reasonable travel costs (lodging, transportation, local transportation, audio-visual, printing, and meals and incidental expenses [M&IE]) for technical assistance staff and consultants may be reimbursed.

The following list of questions is intended to assist in determining whether an event qualifies as an operational meeting or technical assistance visit:

1. Will there be meeting room costs?
2. Will the audio-visual costs be greater than \$25 per attendee per day or exceed \$20,000?
3. Will there be any food and beverage costs paid for with OVW funds?
4. Will there be a registration fee?
5. Will there be a published (e.g. posted on a website) substantive agenda?
6. Are the logistical planning costs expected to exceed incidental internal administrative costs necessary to arrange travel and lodging for a small number of individuals and to reserve meeting room space?

If the answers for an event are all "No" to the above questions, the event does not require prior approval. Recipients should retain documentation regarding their reason for not submitting a meeting or technical assistance visit for prior approval. A brief memo to their files indicating the responses to the questions in the checklist would suffice.

Please contact your OVW program manager for assistance in determining if an event meets the conditions requiring prior approval.

LOCATION SELECTION

If it is determined that an in-person meeting is necessary, minimizing costs must be the primary goal of a grantee or cooperative agreement recipient (or subcontractor) when determining the city and facility in which to hold a conference. Conference planners must compare multiple facilities in multiple locations unless there is an overriding operational reason to hold a conference in a specific location. Recipients must make every effort to use no-cost facilities

(including available government facilities) to the extent practicable. Conference planners must exercise special care when considering holding a conference in a location or facility that may give rise to appearance issues. Conference planners must ensure that the choice to hold a conference in such a location or facility is made only when there is a determination that it is the most cost-effective option (such as when the majority of attendees live in that location). To ensure that the most cost effective location is selected, recipients should obtain several estimates before making a decision. A minimum of three estimates is required.

An adequate cost comparison must be completed and should include the following:

- Lodging room rates
- Convenience of the conference location (e.g. access to commercial food establishments, local transportation and airports)
- Availability and cost of meeting space, equipment, and supplies
- Commuting or travel distance of attendees
- Safety of facility
- ADA accessibility of the facility
- Consideration of Federal facilities

There are several different types of facilities that can be used for conferences:

- *Federal government meeting space.* Use government-owned or government-provided conference facilities to the maximum extent possible.
- *Convention centers.* Excellent for very large meetings; usually located near a large number of hotels.
- *Conference centers.* Dedicated meeting facilities; good for smaller meetings when numerous breakout sessions are planned.
- *Colleges and universities.* Many have good meeting facilities and can offer sleeping accommodations when school is not in session.
- *Hotels.* Commercial facilities that may be used to meet all conference needs or just lodging needs.

Recipients should use a competitive bidding process in accordance with their established procurement policies and maintain documentation supporting the location and facility selection. Cooperative agreement and contract recipients cannot enter into a contract with a facility until they have received written approval from OVW.

Publicly available federal facilities must be considered in the cost comparison analyses if any such facilities are available for non-federal use within the location selected to hold the event. A federal facility is considered “publicly available” if the recipient is able to easily identify the existence of the space, enter into negotiation for its use, and the space does not require federal government employee identification for entrance and egress. If another type of free space is used for the event, a federal facility does not need to be considered. Meetings in which a majority of the attendees are federal employees must always consider use of a federal facility and request advance approval for using a non-federal facility. A non-federal facility can be considered if there are no

publicly available federal facilities, available federal facilities do not meet the requirements of the conference or a non-federal facility is more cost beneficial.

When negotiating with hotels, it is generally best to estimate on the low side for the number of lodging rooms. Unless there is only limited available space, hotels are usually prepared to increase the number of lodging rooms; however, they discourage—and in some cases impose a penalty -- if the lodging room guarantees are not met.

CONFERENCE COSTS

The following are cost categories to be included when determining the total conference cost:

- Conference meeting space (including rooms for break-out sessions);
- Audio-visual equipment and services;
- Printing and distribution;
- Meals provided with OVW funds (breakfast, lunch, and dinner);
- Meals and incidental expenses (M&IE portion of per diem);
- Refreshments (prior approval required by OVW);
- Lodging;
- Transportation, such as air travel to/from conference location;
- Local transportation (e.g., rental car, POV to and from airport, taxi or shuttle services)
- Logistical conference planner;
- Programmatic conference planner;
- External trainers/instructors/presenters/facilitators;
- Other costs: all other costs must be identified individually; and
- Indirect Costs: In accordance with negotiated agreements as well as DOJ policy, all indirect costs associated with a conference must be applied to the above categories, as appropriate.

MEETING SPACE AND AUDIO VISUAL EQUIPMENT

The cost of meeting space and audio visual (AV) equipment rental must be limited to \$25 per day per attendee, not to exceed a total of \$20,000 for the conference. For example, if there are 50 people meeting for a 2-day conference, the cost for meeting space and AV combined cannot exceed \$2,500 (50 attendees x \$25 x 2 days). Indirect cost rates must be applied to conference space and audio-visual equipment costs in accordance with negotiated agreements, and must be included when calculating this cost estimate. Additional justification is necessary if the threshold is exceeded. This may lead to a considerable increase in the time it takes to receive approval.

PRINTING AND DISTRIBUTION

Costs for printing and distribution should be minimized as much as possible. Consideration should be given to printing materials within the organization versus using a professional printing facility, providing the conference materials electronically to all attendees prior to, or if appropriate, after the event, or limiting printed materials to only those necessary for use during the event and making all other materials available for download from a conference website or

webpage. Printed materials should minimize paper usage (printing on both sides) and minimize higher cost options (e.g. color printing) where possible without compromising accessibility for those with visual impairments. Award recipients should inquire about the accessibility needs of meeting participants during the registration process and ensure that materials are provided in an accessible format. Please note to ensure accessibility of materials, double-sided printing should only be used if some single-sided copies will also be available; and the use of 14 point font is strongly encouraged. Under no circumstances should fonts less than 12 point be used.

FOOD AND BEVERAGE COSTS

Meals Provided with OVW Funds

OVW funding should not be used to purchase food and/or beverages for any meeting, conference, training, or other event. A rare exception may be made for working meals at a conference that are necessary to accomplishing official business and enhancing the cost effectiveness of the conference. Consideration will be given if one of the following applies:

- The location of the event is not in close proximity to food establishments. Note that it should be a priority to try to secure a location near reasonably priced and accessible commercial food establishments. (If not, additional justification must be provided for using the selected location.);
- If not serving food will significantly lengthen the day or necessitate extending the meeting to achieve meeting outcomes;
- If a special presentation at a conference requires a plenary address where there is no other time for food to be attained; or
- Other extenuating circumstances which necessitate the provision of food.

Furthermore, if a meal is approved by OVW, the cost of any individual meal, plus taxes and any hotel service costs (e.g., labor cost for room setup), must not exceed 150 percent of the General Services Administration (GSA) Meals and Incidental Expenses (M&IE) rate for that meal in that locality per attendee. For example, if a locality has an M&IE total rate of \$46 and the rate for lunch is \$11, the actual cost of the lunch per person can be \$16.50 (\$11 x 150%). OVW strongly encourages costs to stay at or below 100% of the applicable per diem rate for any meal provided, including any service costs. The current GSA M&IE rate breakdown by meal and by locality can be found at <http://www.gsa.gov/portal/content/101518>. Note that the above restrictions do not prevent the direct payment of per diem amounts to individuals in a travel status under their organization's travel policy; however, all conference attendees must ensure that any provided meals are deducted from their claimed M&IE; in this example, the recipient would deduct \$11 from the amount of M&IE claimed for the lunch provided.

Meals and Incidental Expenses (M&IE portion of Per Diem)

Meals and incidental expense for individuals in travel status are allowable conference costs when they are in accordance with an organization's travel policy and the GSA per diem allowances. Anyone covered by per diem meal and incidental expense (M&IE) allowances or reimbursements who attends an event at which food and beverages are provided must deduct the allowance for such meals (i.e., lunch, dinner) provided from his/her per diem allowance.

Refreshments

While meals may at times be permissible, OVW funds should not be used to provide food and/or beverages at any other time of day (i.e. as part of a refreshment break) without specific prior approval. Refreshment breaks will only be considered where there are unique and extenuating circumstances and require significant justification.

LODGING

OVW recognizes that non-federal entities are not entitled to the federal rate for lodging however recipients should make every effort to secure a hotel with rates within the Federal (GSA) maximum lodging rate for the location of the conference. If a rate within the federal rate cannot be secured, recipients must provide justification for exceeding the federal rate. Justification should include: an explanation of why the particular location (including the particular hotel) and dates are required for the event; a description of the steps taken to try to secure the federal rate; the extent that the secured rate exceeds the federal rate; and mitigating cost savings.

TRANSPORTATION (COMMON CARRIER)

All costs associated with transportation to and from the conference such as flights, baggage fees, parking, etc., must be included as part of the total conference cost.

LOCAL TRANSPORTATION

All costs associated with local transportation to and from the airport or conference, such as taxi, shuttle services, rental car, POV mileage, public transportation, etc., must be included as part of the total conference cost.

CONFERENCE PLANNING COSTS

Conference planning requires fiscal prudence and all recipients must review conference planning costs and eliminate all costs that are not absolutely critical or that exceed reasonable and necessary levels.

Cooperative agreement recipients are required to track any time and activity spent on planning conferences separate from time and activity spent on substantive matters. Cooperative agreement recipients must include this information in the required conference reporting. Conference planning has been divided into two categories, logistical and programmatic.

Logistical planning includes activities such as recommending venues, advertising, setting up audio-visual equipment, securing hotel rooms, and other non-programmatic functions. The cost allowed for logistical conference planning (regardless of whether the recipient is planning in-house or is contracting with an outside conference planner) is limited to \$50 for each attendee, not to exceed a cumulative total of \$8,750. For example, if the number of attendees at a conference is 100, the cost allowed for a logistical planner is \$5,000 (\$50 X 100 attendees). Recipients must include the cost of trainers, instructors, presenters and facilitators as well as all other attendees when estimating the cost for logistical planning. Indirect cost rates must be applied to conference planning costs in accordance with negotiated agreements as well as the

DOJ policy, and must be included when estimating the cost of logistical planning. If the recipient expects that the conference planning costs will not exceed these limitations, no further justification is required. If the recipient expects to exceed these limitations, the recipient must justify the costs in writing and the Office on Violence Against Women must approve those costs before the recipient can proceed with the logistical planning.

Programmatic planning includes developing conference agendas, content, and written materials. The cost allowed for programmatic conference planning (regardless of whether the recipient is planning in-house or is contracting with an outside programmatic conference planner) is limited to \$200 for each attendee, not to exceed a cumulative cost total of \$35,000. For example, if the number of attendees at the conference is 100, the cost allowed for a programmatic planner is \$20,000 (\$200 X 100 attendees). Recipients must include the cost of trainers, instructors, presenters and facilitators as well as all other attendees when estimating the cost for programmatic planning. Indirect cost rates must be applied to conference planning costs in accordance with negotiated agreements as well as the DOJ policy, and must be included when calculating the planning thresholds. If the recipient expects that the conference planning costs will not exceed these limitations, no further justification is required. If the recipient expects to exceed these limitations, the recipient must justify the costs in writing and the Office on Violence Against Women must approve those costs before the recipient can proceed with the logistical planning.

EXTERNAL CONFERENCE FACILITATOR/TRAINER/INSTRUCTOR/PRESENTER

Costs of trainers, instructors, presenters, facilitators, or anyone who will be considered “faculty” at the conference should be included as part of the cost of the conference. “External” refers to individuals that are not employed by DOJ or the cooperative agreement recipient that is holding the conference. This may include speakers from private organizations, consultants, and other non-DOJ federal agencies. Only the cost of the services should be included in this category; costs of related travel, lodging, M&IE, etc. should be included in the specific categories for those costs.

OTHER CONFERENCE COST ITEMS

Any other cost that is not included within this policy that is directly associated with the conference must be included as part of the cost of the conference and should be included in this category.

Basic supplies that are necessary for use during the conference (e.g., pens, paper, name tags) may be purchased.

Costs related to meeting accessibility needs for individuals with disabilities or Deaf Individuals should be included in the “Other costs” section. For assistance regarding ensuring that your meeting complies with OVW's accessibility expectations, please contact your OVW program manager.

PROHIBITED COSTS

The following costs are prohibited:

Trinkets (items such as hats, mugs, portfolios, t-shirts, coins, etc., regardless of whether they include the conference name or logo) may not be purchased with OVW grant funds.

OVW funds may not be used for costs of entertainment, including amusement, diversion, social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities).

INDIRECT COSTS

Indirect costs associated with the direct conference costs must be included on conference approval and reporting forms in the individual cost line items. Recipients should indicate if they have a federally approved Indirect Cost Rate or if they are using the 10 percent “de minimis” indirect cost rate. Cooperative agreement recipients must identify indirect costs on the Conference Approval Request Form and Conference Reporting Form.

Organizations must apply their federally approved Indirect Cost Rates to conference costs in accordance with the agreement as well as the DOJ policy or use the 10 percent “de minimis” indirect cost rate in accordance with 2 CFR 200.414. Organizations that use the Modified Total Direct Cost distribution method must comply with the following restrictions:

- Subcontract/Subaward limitation: Indirect costs can only be applied to the first \$25,000 of any subcontract or subaward under the agreement. This limitation must be applied to all conference-related subcontracts, including those with hotels and travel agents.
- Participant Support Costs: Participant support costs are direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees). Recipients may not, therefore, apply indirect cost rates to participant support costs such as lodging, meals and incidental expenses, local transportation, and airfare (common carrier transportation). This applies to the entirety of any subcontracts for the lodging and travel of the participants of a conference. A conference participant is an individual who is attending the conference and is not engaged in providing training, instruction, presenting or facilitating during the conference.

APPROVAL REQUIREMENTS

In addition to the regular budget approval process, cooperative agreement recipients must complete and submit the “DOJ-Sponsored Conference Request and Report Form” to their OVW program specialist and OVW.ConferenceReport@usdoj.gov for review and approval prior to entering into a contract for any meeting, conference, training, or other event (with the exception of logistical or programmatic planning contracts that meet the established cost threshold). The form and instructions can be found at <http://www.justice.gov/ovw/grantees>. Completed forms must be submitted to OVW in advance of the deadline for signing conference-related contracts, the anticipated start date of the conference or event, or the obligation of funds for conference costs (except for minimal costs required to assemble and submit the prior approval request), whichever is earliest, within the following time frames:

- 90 Days in advance: Total cost of a conference is less than \$100,000 and does not exceed any of the costs thresholds (inclusive of direct and indirect costs); or

- 120 Days in advance: Total costs of a conference is \$100,000 or above or any of the cost thresholds will be exceeded.

Blanket Requests: Cooperative agreement recipients may request approval for more than one conference at the same time if the name and purpose of each conference are the same and they occur during **the same federal fiscal year**. The location and dates of the conference must be identified in the request (if known). The requirements for a blanket request are the same as for requesting individual conferences. Expenditures for each conference must be reported individually and follow the reporting guidelines outlined below.

CONFERENCE REPORTING

All cooperative agreement and contract recipients must submit reports on conferences with total costs that exceed \$20,000 or for any conference at which more than 50% of the attendees were Department of Justice employees. The report must be submitted within 30 days of the end of the event. Award recipients are encouraged to establish policies regarding timely submission of invoices to ensure that they can meet the conference reporting deadline.

The reporting form is on the same form as the conference request. After the actual cost amounts have been entered, provide justifications where indicated. The completed report form is to be submitted to your program specialist and the OVW.ConferenceReport@usdoj.gov email. If you submitted a conference request form with estimated costs of more than \$20,000 but the actual costs were under \$20,000, please either file the report with the actual costs or submit a letter stating that the final actual costs of your event did not exceed \$20,000 on your organization's letterhead to your OVW program specialist and OVW.ConferenceReport@usdoj.gov.

Under the Violence Against Women Reauthorization Act of 2013, sponsored and supported conferences costing more than \$20,000 must also be reported to Congress by OVW and will be publicly posted.

If you have additional questions about any part of the conference request and reporting process, please contact your program specialist for guidance.