Conference and Event Approval, Planning, and Reporting FAQ

Prior Approval

1. Approximately how long should it take to adequately complete the Conference & Events Submission form?

The amount of time required to adequately complete the Conference & Events Submission Form will vary depending on the complexity of the proposed event. A small event (in terms of number of attendees, total cost, etc.) may require only an hour or two to complete the form because the event is basic/routine and data are not required in all of the available categories. On the other hand, a large event (in terms of number of attendees, multiple sessions occurring at the same time, etc.) may require several hours or days depending on the amount of required data (categories) and level of justification needed to support the event. Regardless of the size of any event, the supporting justification should be sufficient to support the agency's mission for conducting the event.

2. Which types of events do not require prior approval?

Currently there are six types of events that do not require prior approval:

- 1. Conferences held by grant recipients. (Note: Conferences held by cooperative agreement recipients do require prior approval.)
- 2. Law enforcement operational activities, including staging, surveillance, investigation, intelligence, and undercover activities.
- 3. Routine operational meetings (e.g., staff meetings or all-hands meetings) if held in a federal facility, if held by cooperative agreement recipients in a non-federal facility that does not charge for its use, and if there are neither costs to the DOJ for logistical conference planning nor government-provided food or beverages. In all three of these instances, the answer to all the questions on the <u>Prior Approval Not Required Checklist</u> must be "No." Site visits are considered routine operational meetings regardless of location so long as there are no costs to the DOJ for meeting rooms, logistical conference planning, or food and beverages.
- 4. Testing activities where the primary purpose of the event is to evaluate an applicant's qualifications to perform certain duties necessary to his or her job. This includes firearms and weaponry proficiency testing and certifications. A majority of the event must be devoted to administering and taking the test. Testing activities that are incidental to a training course or conference or are given upon its completion do require prior approval.
- 5. Video conferences and webinars where there are neither costs to the DOJ for logistical conference planning nor government-provided food or beverages.
- 6. Technical assistance visits where travel was made by an individual or a small group of project staff members to provide training or technical assistance to a particular entity; in this instance, the answer to all the questions on the <u>Prior Approval Not Required Checklist</u> must be "No."

3. Where should time staff spent working on the conference that is not related to planning be captured?

Time spent working on a conference by staff or contractors can be classified as either logistical planning time or programmatic planning time. Programmatic planning includes time spent on activities such as developing the conference content and agenda, identifying and recruiting subject matter experts, and preparing written materials. Logistical planning includes time spent on tasks such as selecting a venue, ordering and setting up audio-video equipment, securing hotel rooms, processing registrations, providing onsite support during the event, and undertaking other non-programmatic functions.

4. If a cooperative agreement recipient or contractor is able to obtain a no-cost site for the event, are we still required to look into other facilities and provide justification for not selecting the other facilities?

Yes. Cooperative agreement recipients and contractors should compare three or more facilities in a location. Facilities being compared should have provided a cost estimate and be able to accommodate the event as detailed in the requirements. A desired hotel may offer an incentive of no overall facility cost (e.g., for meeting rooms or audio-visual equipment) but may not be economical in other cost comparison items such as the availability of lodging at per diem rates, travel distance for attendees, etc. Also, recipients and contractors should maintain written documentation justifying their decision to select the chosen location in the event of a future audit.

5. Is there a timeframe after the COPS Office accepts a conference request that a cooperative agreement recipient or contractor can expect notification of approval?

Each event request (meeting, conference, webinar, etc.) is unique in reference to how it will accomplish the COPS Office's mission. The key to any conference request moving through the review process depends on whether the package is complete. A complete package contains a detailed cost analysis and sufficient justification to support all categories within the package.

Example: An event is submitted for approval and consists of the following categories: printing and distribution, meals and incidental expenses (M&IE), lodging, transportation, and trainer or facilitator costs. The package contains a detailed cost analysis of each cost category (e.g., one trainer at \$450 per day x 2 days = \$900) and adequate justification explaining the purpose of the event and the role of the trainer. This package can move through the review process in a few days and allow ample time for travelers to make reservations, if the package was submitted within the required timeframe. However, if the trainer or facilitator's costs in the submitted package exceed the COPS Office's threshold and if supporting justification was not included, a delay may occur while this justification is being retrieved.

To avoid delays in the approval process, all recipients and contractors should adhere to the timeframe requirements for the dollar amount of their proposed event.

6. Once an event is approved, how do we handle any increases or decreases in the amount of attendees originally proposed on the cost analysis spreadsheet submitted to the DOJ for approval?

After receiving notification of approval from the COPS Office, all subsequent changes prior to the start day of the event should be sent to the <u>COPS Office Conference Costs email address</u>, as appropriate. **Example:** If the COPS Office approved on 9/1/2017 an event scheduled for 12/15/2017, the cooperative agreement recipient or contractor should notify the COPS Office of any changes in attendees as soon as possible (preferably 30 days or more in advance). This scenario holds true for changes to the start and end date, location, and any other cost-related category.

7. Does the \$25 per person per day limit for meeting rooms and audio-visual costs also include service fees and taxes?

Yes. The cost allowed for conference space and audio-visual equipment and services (fees and taxes) is limited to \$25 per day per attendee and is not to exceed a cumulative <u>total cost</u> of \$20,000. <u>Total costs</u> are defined as direct and indirect costs.

8. What if there are multiple meetings occurring within the larger event offered to all the attendees? Is the \$25 per day per attendee limit applicable to each meeting? Example: A general session meeting contains all attendees and later breakout sessions are offered to the groups. Can each breakout session have its own \$25 per person per day limit?

No. Despite the multiple meetings offered within the larger event, the COPS Office considers and approves this type of situation to be a single event.

9. Can we accept complimentary food and beverage?

Yes. Complimentary food and beverages may be accepted if offered to everyone. **Example:** Hotel W offers a complimentary continental breakfast to all its overnight customers regardless of any status they may have with the hotel chain. This type of complimentary offer is considered a business strategy of the hotel to promote an increase in overnight stays. You are not required to reduce your M&IE by the value of the food and beverage it offered to all customers as noted in this example.

10. Are the thresholds (\$8,750 for logistical planner, \$35,000 for programmatic planner, and \$20,000 for conference space and audio-visual equipment and services) a cumulative cost for the entire event or a per day cost?

The cost allowed for conference space and audio-visual equipment and services (fees and taxes) is limited to \$25 per day per attendee and is not to exceed a cumulative <u>total cost</u> of \$20,000. The cost allowed for a logistical planner is the lesser of \$50 per attendee or \$8,750 per event. The cost allowed for a programmatic planner is the lesser of \$200 per attendee or \$35,000 per event.

11. To whom should I submit event requests?

For all COPS Office events, the form should be sent to the <u>COPS Office Conference Costs email</u> <u>address</u>. Please do not send questions or other correspondence to this email address. This mailbox should be used only for the submission of conference forms and supporting documentation (e.g., hotel contracts).

12. How far in advance do I have to submit an event for review and approval?

Requests for conferences costing \$100,000 or less, and not exceeding any cost thresholds (conference space and audio-visual equipment and services, logistical conference planner, and programmatic conference planner), must be submitted to the COPS Office <u>90 calendar days</u> in advance of the earliest of the following:

- Start date of the conference;
- Deadline for signing conference-related contracts; or
- Obligation of funds for conference costs (except for minimal costs required to assemble and submit the approval request).

Requests for conferences costing more than \$100,000, or exceeding any one cost threshold (conference space and audio-visual equipment and services, logistical conference planner, or programmatic conference planner), must be submitted to the COPS Office <u>120 calendar days</u> in advance of the earliest of the following:

- Start date of the conference;
- Deadline for signing conference-related contracts; or
- Obligation of funds for conference costs (except for minimal costs required to assemble and submit the approval request).

If approval requests are submitted less than the required number of days in advance (as noted above), the COPS Office, in its sole discretion, may consider the late requests but cannot ensure the requests will receive a decision in time to avoid having to cancel the conference (particularly if any issues arise with specific items of cost in the request). Cancellation costs associated with conference requests that are submitted for late prior approval may be determined to be unallowable costs by the COPS Office.

13. What are the most common mistakes made on the forms so that I can avoid them in the future and increase the likelihood of a quick review and approval decision for my event?

Below are the most common mistakes found:

 Inaccurate calculation of daily per diem. Daily per diem rates for locations across the nation can be found on the <u>GSA website</u>. Ensure the daily rate used in the calculations corresponds to the specific location and dates of the meeting. In addition, remember that travel days are reimbursed at a slightly lower rate than meeting days. The lower rates must be used for days of travel both before and after the event. The following chart includes these lower rates:

Full per diem rate	Corresponding travel day rate (75%)
\$46.00	\$34.50
\$51.00	\$38.25
\$56.00	\$42.00
\$61.00	\$45.75
\$66.00	\$49.50
\$71.00	\$53.25

EXCEPTION: If your organization has its own formal, written travel policy, your event submissions can reflect that policy instead of the rates in the chart above. In these instances, state that you have a formal, written travel policy, and clearly explain the rates in the policy and how the corresponding numbers in your submission were derived.

- Insufficient explanation and justification of transportation costs. Remember to break out and briefly describe and justify the transportation costs that are included. **Example:** If participants are flying to your event and the tickets are being paid for with DOJ funding, you should include the anticipated number of people flying multiplied by the estimated cost per ticket. If cars will be rented, you should include a brief justification for why rental cars are being used instead of another form of ground transportation, such as taxis or shuttles.
- Insufficient explanation and justification of audio-visual costs. All audio-visual costs should be broken out and briefly described. The quantity of equipment to be rented (number of microphones, projectors, etc.) should be included, along with relevant costs and a brief justification for why the proposed equipment is required to conduct a successful meeting. A discussion of how the audio-visual services provider was selected should be included (for example, did you obtain three quotes?).
- Insufficient explanation and justification of printing costs. Proposed printing costs for participant materials should also be itemized and briefly described. Specifically, it is important to articulate why printed materials are needed instead of making materials available electronically (at low or no cost) to attendees before or after the event.
- Insufficient explanation and justification of shipping costs. Provide an itemization of these costs, along with a brief description of why the equipment and other materials being shipped are essential to hosting a successful conference.
- Insufficient explanation and justification of consultant costs. The maximum daily rate for subject matter experts who are being reimbursed for their time is <u>noted here</u>. Describe all consultant costs in detail, and include a brief yet compelling justification for the proposed costs. Daily rates for subject matter experts above the maximum daily rate require prior approval by the COPS Office and DOJ. In cases where higher rates are included in the event submission, written documentation of prior approval is required and should be attached.

14. Should I continue to exclude all food and beverage costs in my event submissions?

Yes. The inclusion of food and beverage costs will delay the review process, and these costs are not likely to be approved. The only exception is when the location of the conference does not allow attendees to obtain food or beverages on their own or when this restriction would greatly disrupt

the conference schedule. If you believe your event qualifies for such a rare exception, contact your program manager to discuss it before completing and submitting your form. If meals are included in your event submission, remember that attendees must subtract the meal costs from the M&IE reimbursement for the days on which the meals will occur.

15. Can you summarize what I can do to prevent follow-up questions about my submitted events that delay the review and approval process?

As a general rule, explain how you derived <u>every</u> cost that you include in the conference submission form. For lines that do not provide space for you to add descriptive narrative, include your explanations and specific cost breakdowns in a separate tab or in a separate document that is submitted with the form. In addition, include the cooperative agreement or contract number on the form.

16. What events qualify for the expedited review process?

There is no expedited review process. Every effort is made to review all events as quickly as possible.

Most delays result from a need for additional information. Event requests are prioritized for review by balancing the following three criteria:

- The start date of the event;
- The date the event submission was received by COPS Office; and
- The overall cost and complexity of the event. For example, conferences requiring approval by the assistant attorney general's administration and the deputy attorney general (over \$100,000– \$250,000) typically take longer to process, as they must go through COPS Office and DOJ reviews, result in more questions, and are more likely to have issues related to cost thresholds.

Reporting

17. Where can I find the most updated version of the conference reporting form to use for my submissions?

The most updated version of the conference reporting form can be found under the Training Resources for grantees section on the COPS Office Training <u>page</u>.

18. If I have a question about conference reporting, to whom should I send it?

Send your questions to your designated program manager. They are great resources and will be happy to assist you.

19. Are we expected to have our staff track their time hour for hour for time spent on the event for planning, etc., or are reasonable estimates adequate for cost reporting purposes?

Post-event reports must contain actual costs, not estimates. These costs should include *logistical* and *programmatic planner* staff time spent on these activities and any *contracted planner* costs.

20. With conference cost reports now being due 30 days after the event, how should we handle costs for invoices that have not been received yet? Many invoices (such as for hotels) are not received within 30 days after the event. Should estimates be included on the cost report?

All conference costs for events held by cooperative agreement recipients or contractors costing more than \$20,000, or where more than 50% of attendees are DOJ employees, must be reported within 45 calendar days after the last day of the event.

21. On the DOJ Conference & Events Submission Form under "A. General Conference Information," is item 19, "Reporting Period," the period in which the actual cost of the event is being reported, or should this be based on the end date of the event?

This reporting requirement is based on the end date of the event. All conference costs for events held by cooperative agreement recipients or contractors costing over \$20,000, or where more than 50% of attendees are DOJ employees, must be reported within 45 calendar days after the last day of the event. **Example:** A COPS Office–approved conference was conducted from 3/16/2018 through 3/20/2018. A completed Conference & Events Submission Form must be submitted, showing the prior approval amounts compared to the actual costs and explaining all variances greater than 10% or \$1,000. Reports should be emailed to the <u>COPS Office Conference Cost email address</u>.