



U.S. Department of Justice

Office of Justice Programs

Office of the Assistant Attorney General

Washington, D.C. 20531

October 21, 2011

MEMORANDUM TO: All Office of Justice Programs Grantees and Contractors

FROM: Laurie O. Robinson //s//
Assistant Attorney General

SUBJECT: Newly Enacted Conference Costs and Reporting Requirements

In our last message to Department of Justice (DOJ) grant recipients on Friday, September 30, 2011, we promised we would be providing an update and additional guidance on conference planning, minimization of costs, and conference cost reporting. The purpose of this memorandum is to notify you of several key changes to OJP's conference cost guidelines.

As you may recall, the September 30th message discussed the importance of complying with the Department's guidelines and policies on conference planning, costs, and reporting. We asked that you work with us to strictly minimize costs, ensure we are prudent in our spending, and avoid the fact or appearance of extravagant spending. This includes such measures as identifying alternative ways to provide training, such as webinars, acquiring the lowest cost locations and venues, minimizing travel costs, and ensuring all conference costs are necessary business expenses.

Over the last 30 days, we have reviewed the costs associated with hundreds of conferences, meetings, and trainings funded by the Department. While many of these events have included food and beverage, conference planners, and related costs that are within DOJ guidelines, we have also worked with many grantees to amend or eliminate costs that were not within guidelines and with others that were within guidelines but not absolutely necessary costs. We recognize these reviews have taken a great deal of time and effort on your part and we appreciate your continuing cooperation.

While more detailed policy guidance is being considered by the Department, OJP has made several key changes to its conference cost guidelines as outlined below. These changes are **effective immediately** and are incorporated into OJP's Financial Guide by reference, now superseding the previous guidance in the OJP Financial Guide and Food & Beverage Policy:

Food and Beverage Costs

New contracts and agreements

No OJP funding can be used to purchase food and/or beverages for any meeting, conference, training, or other event. Exceptions to this restriction may be made only in cases where such sustenance is not otherwise available (i.e., extremely remote areas), or where a special presentation at a conference requires a plenary address where there is no other time for sustenance to be attained. **Such an exception would require prior approval from OJP.** This restriction does not apply to water provided at no cost, but does apply to any and all other refreshments, regardless of the size or nature of the meeting. Additionally, this restriction does not impact direct payment of per diem amounts to individuals in a travel status under your organization's travel policy.

Existing contracts and agreements

Grantees that have already contracted to provide such services should renegotiate such contracts to avoid these expenditures. Of particular concern are refreshment breaks and breakfasts. Both should be eliminated to the extent possible. **Regardless, only one refreshment break a day is hereafter allowable under the guidelines, and the cost of this one refreshment break may not exceed 11.5% of the General Services Administration (GSA) locality Meals and Incidental Expenses (M&IE) rate.** However, DOJ strongly prefers that such costs fall well below 11.5%. Events with two refreshment breaks will not be approved. Note: This only applies to events for which you have entered into a contract prior to today's date. **From this date forward**, no OJP funding may be used to purchase food and/or beverages for meetings, trainings, etc., unless OJP approves it due to exceptional circumstances.

Further, while the food and beverage policy in effect until today allowed grantees to charge meal expenses to the grant for up to 150% of the GSA locality M&IE rate per meal per attendee, we are strongly encouraging grantees in their renegotiations to stay at or below 100% of the applicable per diem rate for any meal provided, including any hotel service costs.

Conference Planning Costs

The Department has also identified conference planning costs as an area for further review. Accordingly, all grantees are asked to review all conference planning costs and to ensure, wherever possible, grantees avoid situations where the conference planning costs are not absolutely critical or exceed reasonable and necessary levels.

Prior Approval of Conference Costs for Conferences Funded Through Cooperative Agreements¹ and Contracts

We must also remind grantees that are funded through cooperative agreements that under the terms of their award (Statement of Federal Involvement) may not enter into any contract for services without the prior consent and approval of the OJP bureau or program office.

Meetings, trainings, etc., that are already scheduled may not proceed until you receive e-mail notification from OJP that the event and all of its associated costs have been approved. In the absence of such approval, grantees must cancel the event. In order to reduce the inconvenience to travelers and the incurrence of penalty fees, it is critical that you stay in touch with your program manager and submit events for approval as early as possible. Until we are well ahead in the approval submission process, it will not be uncommon for you to receive approval just a few days prior to the start date of the meeting. Proactive communication between you and your assigned program manager is extremely important as well as detailed documentation and records retention related to conference costs.

While taking these steps today will undoubtedly create concern and inconvenience for many, the Department believes that these steps are necessary to ensure that we are meeting the highest level of accountability and limiting our costs to mission critical services. We expect additional guidance to be forthcoming in the weeks and months ahead.

Should you have questions about these requirements, please contact the Office of the Chief Financial Officer Customer Service Desk at 1-800-458-0786

Again, thank you for your cooperation in implementing these policy changes. OJP and all of its bureaus and offices remain fully committed to our mission of outreach and partnership with the field. Revising our financial guidelines as described above will allow us to continue that critical work with each of you.

¹ A cooperative agreement is a specific type of grant award noted by a “K” in the award number.