

**From:** [Jenkins, Joe \(NIH/NCI\) \[E\]](#)  
**To:** [NCI DCTD-ARC](#)  
**Subject:** FW: NCI Guidance for Implementing the June 15, 2012 Guidance of the DHHS Efficient spending Policy - Final Draft  
**Date:** Wednesday, July 11, 2012 9:27:11 AM

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Some more clarification the “conference rules”. Please read everything.

Please bear with the ever increasing number of clarifications to the conference policies...it is important to read them carefully, discuss them, and forward any questions you might have so you can work with the latest and greatest information.

I have three major concerns:

1) Getting and acting on a long range forecast for the site visits, conferences and TDY travel that two or more folks attend (this is not the LAE request). Heather will ask for the LAE attendance and report that information separately, but what I am talking about is having a good method for capturing the “two or more travel” that includes anyone traveling on the governments dime – contractors, fellows etc., for site visits or other nominal TDY.

2) I will get queries from other ARC mangers regarding attendance for the “nickel/dime” conferences that have a couple people attending from that other Division. What is the easiest and most efficient way to check with you and get the info quickly so I can respond to travel queries ?

3) Not obligating funds until we have approval e.g. for registration, travel costs, non-federal facilities. Are 60 days reasonable for submitting the “Attachments” to the appropriate approval authority at NCI/NIH/HHHS, or do we need to increase the time so the documents arrive to you earlier so you can meet the 60 day rule?

Since this impacts you, I hope you will offer some good ideas in ways to get the information we need. Just to make this interesting: 59 minutes to the person(s) whose ideas are instituted in the ARC. Think of it in terms of an end to end process. Send your “cards and letters” with the solutions to me and Dana

Regards,

Joe

ARC Manager, DCTD  
301-594-5965

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**From:** Kiser, Susan (NIH/NCI) [E]  
**Sent:** Wednesday, July 11, 2012 7:58 AM  
**To:** Osborne, Joy (NIH/NCI) [E]; Jenkins, Joe (NIH/NCI) [E]; Tobiassen, Bridgette (NIH/NCI) [E]  
**Cc:** Carney, Deborah (NIH/NCI) [E]; Smith, Mary (NIH/NCI) [E]  
**Subject:** RE: NCI Guidance for Implementing the June 15, 2012 Guidance of the DHHS Efficient spending Policy - Final Draft

Good questions so I thought I would share the answers with everyone.

1. By your asking the other 2 Extramural ARC Managers about any travel you are saving me from sending an e-mail out to them. Depending on your answering the question if anyone else from NCI might attend the same meeting will determine if Deb Carney would have to survey CCR and OD. I am asking that you send your response about non-HHS meetings to me and I in turn will pass to Deb. This process is in part to try and reduce the number of e-mails coming into the ADAO office and to allow each ARC Director the flexibility to determine if there is a need for Deb to survey the rest of the IC or send on to NIH. Unfortunately your travel contacts will still receive requests from Deb to survey their areas for meetings that other ICs have indicated they have 5 or more attendees.
2. NLT 60 days of obligation of funds – we are not to make any obligations until we have approval from the proper level of authority (IC EO, NIH, HHS). Hence the reason we are asking for program to provide their intent 60 days in advance. The Department has asked to have time to review and ten days to do their review in which they are asking for 45 days – we used 60 as a means to keep things afloat as much as possible by addressing what needs to be done for each request as early as possible. We understand that we are behind the 8 ball for meetings occurring in July, August and September. Your suggestion to change the verbiage to “no obligations can occur until approval is obtained” you can add yourself to send out to your areas; I made an adjustment below which you can use or state more strongly.
3. Number of travelers under Attachment C includes all travelers that NCI would be providing support to. This would include federal staff, contractors, fellows, and any travelers that NCI would be paying travel expenses. I added a line below.
4. Site visits were not specifically identified in guidance from NIH or Department as types of gatherings that did not need to follow the approval process. For this type of meeting we would need to review on a case by case basis. I would support that site visits authorized via a grant or contract would not need to complete Attachment A. This is why I am recommending to all of you to forecast your Division travel and conferences by at least six (6) months so we have time to work through any issues that might come up.
5. While not a question from Joy but a point I would like you all to be aware of – each ARC Director can place additional guidance on their groups. For example CCR and OD may handle the reporting of their travelers differently or the actual dates they are giving to their labs to provide conference information. If you have any questions about the process or a specific conference etc. contact me so we can discuss. This is an evolving process, one in which NIH is not sure what they are looking for or need when actions must go to the Department so there may be changes and we know we have not covered every situation so we will have to work through how to handle.

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**From:** Osborne, Joy (NIH/NCI) [E]

**Sent:** Tuesday, July 10, 2012 4:20 PM

**To:** Kiser, Susan (NIH/NCI) [E]

**Subject:** RE: Draft NCI Guidance for Implementing the June 15, 2012 Guidance of the DHHS Efficient spending Policy - Final Draft

I have some questions:

1. If I submit the request to the other extramural ARC managers for travelers to a meeting and then forward the results to you, does this mean Deb Carney will not have to request the travel information for the mtg from NCI?
2. On page 2 under Attachment A: it states "NLT 60 calendar days in advance of issuance of a solicitation or obligation of funds." We are assuming this means no solicitation of bids from hotels or obligation of funds (of any kind). We were wondering if it could be strengthened and underlined to state absolutely to include no obligations can occur until the approval is obtained.
3. On page 2 under Attachment C: it states "no later than 70 days prior to the start of the trip if there are 2 or more travelers;" could this be clarified to indicate it is federal travelers, non-federal travelers, or both.
4. On page 3 the events that are considered meetings do not explicitly include site visits. Are site visits considered meetings?

Thanks; your help is always appreciated!

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**From:** Kiser, Susan (NIH/NCI) [E]  
**Sent:** Tuesday, July 10, 2012 11:50 AM  
**To:** Jenkins, Joe (NIH/NCI) [E]; Tobiassen, Bridgette (NIH/NCI) [E]; Osborne, Joy (NIH/NCI) [E]  
**Subject:** FW: Draft NCI Guidance for Implementing the June 15, 2012 Guidance of the DHHS Efficient spending Policy - Final Draft

**Below is the latest NCI guidance for how we will handle the process of requesting approval for conferences and travel to non-HHS meetings. In addition, to the guidance below I would like for our group to do the following:**

For Attachment C – request to attend a non-HHS meeting, if your area has at least two travelers going to a non-HHS meeting please send a notice to the other Extramural ARC Managers (Joe, Bridgette, and Joy) as to their having any travelers going to the same meeting – and then after hearing back to send forward an e-mail to me stating that you talked to the other two Managers and this is the total we have for this meeting. Hopefully this will save on the number of e-mails about this type of meetings.

If you have any questions give me a call.

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The purpose of this guidance is to provide you with the latest changes to the HHS and NIH guidance for Efficient Spending Policy. This policy applies to all funds appropriated by Congress (obligated after January 3, 2012), whether from an annual appropriation, multi-year appropriation,

appointed user fee, gift funds, mandatory appropriation, royalty funds, CRADA funds, or reimbursements from such appropriations, etc. Attached you will find a copy of the DHHS (dated June 7, 2012) and NIH (June 15, 2012) Memorandums; the guidance also includes the 3 new forms that must be used when requesting approval for conferences/meetings and travel to non-HHS sponsored meetings. The June guidance updates only portions of the earlier guidance on conference and meeting attendance. The earlier guidance still applies as it relates to food, promotional items, printing and publications. You are reminded that conference requests that include food as part of the total estimated cost will NOT be approved.

Please note that the conference spending moratorium issued May 21, 2012 is rescinded with the issuance of the NIH June 15, 2012 memorandum.

All planned conferences or meetings that have received NCI EO approval (via the previous conference form) before the issuance of this policy that have not yet taken place will be handled on a case-by-case basis. Please contact your ARC Director regarding any of those events. A decision will need to be made as to whether or not the event will need to be re-submitted for approval on the new conference form. The decision will be based on the amount of new obligations to be incurred for the event aside from HHS-funded travel costs.

The new guidance updated the definition of conference to be any meeting, retreat, seminar, symposium or event that involves attendee travel (including local travel and training conferences and where attended travel is funded by HHS). The term conference also applies to training activities that are considered to be conferences under 5 CFR 410.404. HHS interprets this definition to mean attendee travel that is funded by HHS, not an outside source and to include conferences held locally by the OPDIV or STAFFDIV. At this time, this also includes events where an invited guest speaker comes to give a scientific talk or present a recruitment seminar. NCI has requested a waiver to this single traveler type of event, but for now the policy applies.

**Approval Levels:**

1. Below \$25,000 – IC Executive Officer
2. \$25,000 - \$100,000 – NIH Director
3. \$100,000- \$499,999 – HHS Deputy Secretary
4. Over \$500,000 – HHS Secretary (waiver required)

**Required forms:**

1. **Attachment A:** NIH Conference/Meeting Approval Form – Shall be used to request approval for all NCI-sponsored conferences. Requests for approval of conferences requiring approval beyond the IC Executive Officer shall be submitted to the ARC for forwarding to the respective approving official NLT 60 calendar days in advance of issuance of a solicitation or obligation of funds. Requests requiring only the approval of the IC Executive Officer should be submitted to the ARC for forwarding within 50 days of the event. The form requests detailed cost information such as contractor/planner costs, registration website, speaker fees, federal attendee travel, non-federal attendee travel, registration fees, etc. Since the ADAO will be submitting any requests to NIH, if the request

requires approval beyond the EO level, we will let the servicing ARC be aware of the status of package when sent forward and decision when returned. For those packages requiring just EO approval, ADAO will return the signed form as we currently do. Remember no obligations of funds can occur until approval has been given. This would include no hotel contracts being signed or payment of any other expense for the conference.

2. **Attachment B:** NIH Conference Request for Waiver – Shall be used if the amount of the event is estimated to be over \$500,000. Attachment A would be submitted along with Attachment B for approval.
  
3. **Attachment C:** NIH Conference Attendance Request and Approval – Shall be used for non-HHS sponsored conferences where the IC expects to send 5 or more attendees and/or where the expenditures are expected to be \$25,000 or more for any single conference. Due to our size, NCI is asking that a completed Attachment C be forwarded to the servicing ARC Manager no later than 70 days prior to the start of the trip if there are 2 or more travelers from any one branch/office planning to attend the same conference. Traveler is defined as anyone that NCI would be providing fiscal support for their travel, including federal staff, contractors, fellows etc. The ARC Manager will forward to the servicing ARC Director, who will determine the total number of attendees from his/her serviced-division and forward to the ADAO. (CCR ARC travel contacts should refer to division-specific policy on submitting the Attachment C to the servicing ARC Director.) The ADAO will check with the rest of the IC to gather information on total number of potential travelers from NCI to the specific conference/meeting. If the number of travelers from NCI is 5 or more and/or the cost of the total travel from NCI is \$25,000 or more, the ADAO will forward the information via a consolidated attachment C to NIH for review and approval. Note: The request block on Attachment C should reflect the ARC Director's name

**No registration fees may be paid or travel authorizations approved until the projected attendance has been approved.** It is very important that this message get out to the program and administrative staff. Having paid for registration or making non-refundable travel arrangements will not be a reason to allow a traveler to proceed; the trip would be canceled and the monies would be lost. Decisions on approvals/non-approvals of these requests will be transmitted from the ADAO to ARC travel contacts with a cc to the appropriate ARC Manager and ARC Director.

NCI will be asking each Division to forecast their attendance to non-HHS sponsored conferences 6 months in advance due to these revised approval requirements. NCI is looking into developing a shared drive to post the travel projections to aid us in responding to the numerous anticipated short notice requests for information about upcoming conference/meetings due to the HHS approval requirement for each conference/meeting that might exceed 20 NIH attendees. Details on implementation of the shared drive are forthcoming.

NIH has determined that sponsored travel attendance should be included on Attachment C. If you have a mix between sponsored travel and DHHS paid travel for one conference, include the sponsored traveler(s) in the attendance number and any other expenses they may incur not paid by

the sponsor. (Do not include the sponsor traveler(s) when figuring out an average cost that is paid by the sponsor.) This means that travelers cannot attempt to bypass the “number of attendees” requirement for non-HHS-funded meetings by performing sponsored travel rather than regular travel. The traveler performing sponsored travel will still be counted as an “attendee” of the meeting towards NCI’s total attendance, even though the expenses being paid by the sponsor won’t count towards the NCI estimated total cost.

The following types of gatherings are considered meetings and not conferences; therefore, Attachment A is not required. If, however, one of the following types of meetings is to be held in non-Federal space, the NIH 827-1 form must be completed and signed by the EO (authorized official under Part B.)

Advisory Committee and Federal Advisory Committee meetings

Solicitation/funding Opportunity Announcement review Board meetings

Peer review/Objective review panel meetings

Evaluation panel/board meetings

Program kick-off and review meetings (including those for grants and contracts)

Class room training available through Federal and commercial sources (such as Federal Acquisition Certification classes, supervisor classes etc.)

General staff meetings.

NCI will be posting frequently asked questions (FAQs) that staff can refer to on this new policy. In the meantime, if you have any questions please contact your servicing ARC Director.