

Reclamation Manual

Policy

Conferences

1. **Purpose.** Attendance at conferences presents several potential ethics issues in one setting. The purpose of this appendix is to provide employees with an understanding of the common ethics issues presented by conference attendance.
2. **General.** If you are attending a conference as a Reclamation employee, generally, anything that you receive of value that is not part of the conference registration fee would be considered a gift that you shall not accept, unless an exception to the gift rules applies. This is because you are attending the conference as part of your official duties, which means that the prohibition on accepting gifts given by a prohibited source or given because of your official position apply, even if you are attending an event in the evening when you are not in a pay status.
3. **Included in Registration Fee.** Generally, anything that is provided by the sponsor of a conference and is available to all attendees because it is included in the registration fee is not a gift if either you or Reclamation pay the registration fee. Determining what is included in the registration fee can be difficult, and you shall not assume something is included unless the registration materials clearly state that it is included. When you see a reception, meal, or other event either “sponsored” or “hosted” by some entity other than the conference sponsor, this may mean that the event was not a part of the conference registration fee and requires further analysis under the gift rules. Since certain gifts require pre-approval in writing, prior to attending a conference, you must review the conference materials for events that are not part of the registration fee and contact your ethics official if you are planning to attend. *(Refer to Appendix 2a – Gifts of Travel and Transportation for more information on waiver of conference fees.)*
4. **Prizes.** Conferences often have drawings, raffles, or other types of prize giveaways. The general rule is that employees are prohibited from accepting such prizes unless the contest or giveaway is truly open to the public (not just those that pay a conference fee to attend) or an exception to the gift rule applies. However, prizes available only to conference attendees are generally not considered open to the public no matter how large the conference is.
5. **Waiver of Fees or Payment by an Outside Entity.** Outside entities will, at times, offer to pay expenses related to your attendance at a conference or other event. Depending on the facts and circumstances, it may be permissible for Reclamation to accept payment in kind or reimbursement for a gift of travel from an outside entity. Such expenses could include the costs of registration, lodging, travel, and meals. Waiver of fees paid by other attendees is also considered a gift of travel. Because gifts of travel must be approved in writing, in advance of attendance at a conference, contact your ethics official if you are presented with a gift of travel. *(Refer to Appendix 2a – Gifts of Travel and Transportation for more information on waiver of conference fees and payments by outside entities.)*

Reclamation Manual

Policy

6. **Receptions, Dinners, Parties, etc.** As indicated above, a reception hosted by the sponsor of the conference, open to all attendees and included in the registration fee, is generally not considered a gift. However, any reception hosted by someone other than the sponsor of the conference is likely a gift. In many cases, you may still be able to attend if the reception qualifies under the Widely Attended Gathering (WAG) gift exception, which requires written advanced approval. (*Refer to Appendix 2 – Gifts for more information on WAGs.*)
7. **Speakers.** Several rules allow employees who are participating in a conference as a speaker or panelist to accept waived registration or other travel costs. The General Services Administration (GSA) recently amended these rules so that any costs other than registration on the day the employee is speaking (including meals) must be approved as a gift of travel in writing in advance. Due to the complexity of these rules, all speakers should consult with their ethics official in advance if they are not paying a registration fee. In addition, speakers are subject to the rules regarding endorsement, use of official title, partisan political activity, and release of non-public information. (*Refer to Appendix 2a – Gifts of Travel and Transportation for more information on waiver of conference fees.*)
8. **Conference Examples:**
 - A. Example 1: You will be attending the United States Society on Dams Annual Conference. The agenda includes a “welcome reception” on the first day of the conference. The conference materials indicate the “welcome reception” is included in the registration fee. The agenda also includes a “networking reception” hosted by American Society of Civil Engineers on another night. The conference materials do not indicate that the “networking reception” is included in the registration cost. The “welcome reception” is not a gift and you may attend because it has been paid for as part of your registration cost. However, attendance at the “networking reception” will need to qualify for one of the gift exceptions and will likely be a Widely Attended Gathering (WAG) which must be approved in advance, in writing on the DI-1958 Form.
 - B. Example 2: You have been assigned to speak at the Association of State Dam Safety Officials (ASDSO) Annual Conference. You will attend the 4-day conference and speak on only one day. Reclamation is paying a registration fee which is 50% less for speakers. The registration includes lunch on 2 days and a separate breakfast for speakers and other VIPs. This would be considered a gift because the fair market value was not paid for by the registration fee. Since you are attending on days other than when you are speaking and part of the waived registration fee includes meals, this must be accepted in writing in advance as a gift of travel.