

Reclamation Manual

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Gifts of Travel and Transportation

1. **Purpose.** This appendix provides guidance specific to gifts of travel offered or received in the course of official travel. A gift of travel includes subsistence and related expenses (e.g., lodging, meals, airfare, conference fee waivers) with respect to attendance of the employee (or the spouse of such employee) at any meeting or similar function relating to the official duties of the employee. This is a gift to the agency and not to the employee. (*Refer to Appendix 2 – Gifts for guidance on accepting a gift of travel in your personal capacity.*)
2. **Travel Gifts in Official Status.** Certain authorities permit the Department to accept reimbursement or in-kind payment for travel related expenses for attendance at meetings or similar functions (e.g., conferences, trainings, speaking engagements, and symposiums) from non-Federal sources. Travel benefits accepted from a non-Federal source must be primarily for the benefit of the Government and not the private sector organization paying for the travel benefits.
 - A. Non-Federal sources include any individual, private or commercial entity, non-profit organization or association, international or multinational organization, or foreign, State or local government.
 - B. Requests for approval must be submitted on the DI-2000 Form (see <https://www.doi.gov/ethics/forms/travel-expenses>) at least 5 business days prior to travel via email to your ethics official. All known information, including travel dates, conference agenda, estimated value of travel expenses paid by the non-Federal source, and other relevant items must be included in the request for approval.
 - C. Employees must provide an ethics official with exact amounts of travel expenses accepted, if different than those reported on the DI-2000, within 15 days of return from any approved travel.
3. **Process for Ethics Review of a Gift of Travel.** To accept a gift of travel, follow these steps:
 - A. Review information for the event and the DI-2000.
 - B. If you have enough information to fill out the DI-2000, complete the form and submit it to your ethics official with any additional documentation regarding the event. If you do not have enough information about the event to complete the form, contact your ethics official to assist you in getting information.
 - C. The ethics official will provide a written determination whether you may accept the offered travel benefits. If determined that you may accept, the ethics official will sign and return the DI-2000 to you.

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- D. Once ethics review and guidance are obtained, submit the DI-2000 to your supervisor. Your supervisor must approve or disapprove the DI-2000 request.
 - E. You must return the approved or disapproved version of the DI-2000 to your ethics official. If approved, you must provide the DI-2000 to the ethics official prior to attending the event.
 - F. Your ethics official will retain a copy of the DI-2000 in official files.
 - G. If applicable, report any changes to benefits received during travel.
4. **Mode of Benefit.** A traveler must not accept cash under ANY circumstances. To simplify the travel voucher process, travelers are encouraged to accept "in-kind" travel expenses (that is, prepaid tickets and hotels), rather than expense reimbursement. If reimbursement is in the form of a check, prior coordination must be made with the employee's servicing accounting office.
5. **Gifts, Gratuities and other Benefits received from Commercial Sources.** Certain perks, traveler benefits, and point-system rewards from a commercial source, such as an airline, hotel, or rental car company, earned by employees while on official travel orders that have been funded at Government expense may be kept for personal use. The promotional material must be obtained under the same terms as those offered to the general public and must be at no cost to the Government.
6. **Transportation Related to Regulatory Functions.**
- A. General Rule. The Department may accept gifts of travel for meetings such as conferences, seminars, symposiums, training courses and similar events, but may not accept gifts of travel for regulatory functions such as investigations, inspections, audits, site visits, negotiations, or litigation. Accepting transportation from a stakeholder or contractor to accomplish an official purpose does not fall within any of the gift exemptions or exceptions since Reclamation is receiving the benefit. Unless the transportation is for one of the meetings described above, there is no statutory basis for accepting it.
 - B. Exceptions. Though the general rule is that transportation may not be accepted from a stakeholder to accomplish an official purpose, there are certain limited exceptions. Transportation from a stakeholder is only permissible when:
 - (1) It is provided pursuant to the terms and conditions of an agreement or contract between Reclamation and the stakeholder,
 - (2) reclamation has agreed to reimburse the stakeholder for the transportation, or

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- (3) the transportation is “integral to the visit”. Transportation may be integral to the visit where safety, security, limited access to a location, or the unavailability or impracticability of commercial transportation necessitate contractor-provided transportation. A determination that transportation is “integral to the visit” is very fact-specific and must be made in writing by an ethics official in advance of the visit. (Refer to example 6 below.)

7. Gifts of Travel Examples.

- A. Example 1: You are giving a presentation at a conference in your official capacity. The conference registration fee is \$500 for everyone attending the entire 2.5 days of the conference, but it is waived for all speakers. You will attend the conference for just one day on the day that you are making your presentation. You will receive a binder with all course materials like all other conference attendees and snacks are provided throughout the day. No meals will be provided. You may accept the waived registration without written approval as long as you will only attend on the day of your presentation and there are no other travel benefits provided. Note that even a small change in the facts, such as lunch being provided, would require you to get written approval as a gift of travel.
- B. Example 2: You are giving a presentation at a conference in your official capacity. The conference registration fee is \$500 for everyone attending the entire 2.5 days of the conference, but it is waived for all speakers. In addition, as a speaker you are allowed to have an invited guest attend at half off registration. A fellow employee will use the half off registration discount. Lunch is provided and included in the cost of registration on 2 days of the conference. The waived registration for you and the half off registration for the other employee are both gifts of travel and must be approved in writing and in advance on separate DI-2000 forms. The amount of the gifts is required to be reported semi-annually to Congress through the Office of Government Ethics.
- C. Example 3: You are giving a presentation at a conference in your official capacity. The conference registration fee is \$500 for everyone attending the entire 2.5 days of the conference, but it is waived for all speakers. You will attend the entire conference. In addition, you are invited to a reception for conference speakers and VIPs that is paid for by one of the conference sponsors, but is not part of the registration fee. The waived registration fee and reception are considered separate gifts. The waived registration fee is a gift of travel that must be approved in advance, in writing on the DI-2000. Attendance at the reception will need to qualify for one of the gift exceptions, such as a widely attended gathering (WAG) that must be approved in advance and in writing on the DI-1958.
- D. Example 4: You are the chair of the Dam Safety Committee for the U.S. Society on Dams (USSD) in your personal capacity. You plan to attend the USSD Annual

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Conference, and your supervisor has approved you to attend the conference on official travel. Due to your position with USSD, USSD has offered to pay for your transportation and lodging during the conference and waive your registration fee to the conference. Since you are attending the conference in official capacity, the Department may accept the gift of travel on your behalf. You must submit a DI-2000, which must be approved in advance of the travel.

- E. Example 5: You plan to attend a business meeting that involves multiple stakeholders. A tour of a local conservation area has been planned as part of the business meeting and one of the stakeholders has agreed to provide a commercial bus to transport Reclamation employees and other stakeholders to the conservation area. While at the conservation area, the same stakeholder will also provide a boxed lunch. Both the transportation and lunch are gifts. Since the transportation provided benefits Reclamation, it must be accepted as a gift of travel using the DI-2000. Lunch may be accepted as a personal gift using the \$20 exception or may be accepted as a gift of travel using the DI-2000.
- F. Example 6: Reclamation is conducting a value study that requires several employees to visit multiple points along a canal. Several stakeholders are participating in the value study and one of the stakeholders has offered to rent a 15-passenger van to hold all participants while driving to the locations along the canal. The gift exemptions and exceptions do not apply since the beneficiary of the travel is Reclamation. If there is a cost sharing agreement, the stakeholder should charge the cost of transportation to their cost share. If there is no cost share agreement, then this must be treated as a donation to Reclamation. If there is no statutory authority to accept the donation then the employees should work with their ethics official to determine whether the transportation is integral to the visit because other solutions are impractical.