



**DEPARTMENT OF THE NAVY**  
CHIEF OF NAVAL PERSONNEL  
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From: Director, Resource Management Division (N10)/Comptroller, Bureau of Naval Personnel

Subj: PAYMENT METHOD FOR CONFERENCE REGISTRATION FEES

- Ref:
- (a) DoD Instruction 5154.31, Vol. 4: DoD Government Travel Card Regulations of June 2017
  - (b) Joint Travel Regulations (JTR), Part A, Section 0302: Conferences (Not for Training) of November 2017
  - (c) GAO, Principles of Federal Appropriations Law, 3<sup>rd</sup> ed., Ch. 4, of January 2004
  - (d) 41 CFR Chapter 301-74.21 of July 2011 Edition
  - (e) NAVSUPINST 4200.99B DON Government Commercial Purchase Card Program Policy of September 2012
  - (f) DON ASN (FM&C) Financial Management Policy Manual of September 2016
  - (g) DoD 7000.14-R Financial Management Regulation (FMR) Vol 4, Ch. 14 of June 2015, Vol 10, Ch. 4 of August 2017, Ch. 8 of October 2015, Ch. 11 of December 2015 and Ch. 12 of June 2009
  - (h) Government Travel Charge Card Regulations of June 2017

1. Purpose. To establish guidance regarding the use of the government travel charge card (GTCC) and government commercial purchase card (GCPC) when paying for conference registration fees.

2. Procedure. Per reference (a), the organization's GCPC utilization must be prioritized to pay for conference registration fees as it is the primary method of payment for such expenses.

- a. GTCC users are authorized to pay for conference registration fees as this type of fee is an authorized travel expense per references (a) and (b).
- b. The GTCC utilization exception does not permit Budget Submitting Office 22 (BSO-22) commands to allow travelers to use the GTCC to pay for conference registration fees without constraint.

(1) Approved conference attendee/traveler must work with their GCPC cardholders first to pay for the "early bird" or discounted conference/registration fees.

(2) If the use of GCPC is not feasible, an advance approval to use GTCC must be obtained to pay for the "early bird" or discounted conferences/registration fees. Commands must confirm that the advance approval (verbal or written) is annotated in the remarks section of the travel authorization (Department of Defense form 1610) and supporting documentation of the approval is uploaded in the Defense Travel System (DTS).

(3) Under exceptional circumstances, BSO-22 commands may use the GTCC. Cases such as: when traveler is required to pay the conference/registration fee on site, without prior knowledge of the fee, or when circumstances exist beyond the traveler's control. Commands must confirm that an acceptable explanation/justification is uploaded in the DTS.

c. Commands must determine the type of expense as to whether it is "travel related" or "non-travel related."

(1) Activities under BSO-22 must follow BUPERS enterprise-wide policy and guidance in the general application and execution of when to use GTCC and GCPC to pay for conference/registration fees.

a. If the conference/registration expenses are determined to be travel related (pays for meal or lodging), utilize Travel Voucher Department of Defense (DoD) Form 1351-2 per reference (b) and charge to GTCC. Travel Per Diem needs to be reduced by the number of meals covered by conference/registration fees.

i. Per reference (c), conference registration fees sometimes include meals or light refreshments. These expenses are allowable to the extent that the meal or refreshment is included in the conference registration fee and is not a separate charge.

ii. Additionally, per reference (d), for employees on travel or temporary duty status, per diem is reduced by the value (cost) of the meals provided in the conference registration fee unless the employee is unable to eat the meal provided (and cannot arrange for an acceptable substitute) because of bona fide medical or religious reasons. If light refreshments are furnished, no deduction of the M&IE allowance is required.

b. If the conference/registration expenses are determined to be training related costs (training materials, attendance fees for courses, etc.), utilize the Request, Authorization, Agreement, Certification of Training and Reimbursement Standard Form (SF) -182 as the authorized and required source document to purchase training not subject to contracting procedures per reference (e) and (f). These are charged to GCPC.

(2) If the conference/registration expenses are determined to be mission-related expenses incurred while in a travel status, then these are not payable on a travel voucher and/or by using the Defense Travel System, per reference (g). Refer to the Joint Travel Regulations (JTR), for items allowable for reimbursement while in travel status. Since mission related expenses are not reimbursable travel costs, they are reimbursed using OF - 1164 (Claim for Reimbursement for Expenditures on Official Business) per reference (f) and (g). Completed OF -1164 must be submitted to your local financial office for line of accounting assignment and processing. Example: FEDEX or mailing cost.

3. Internal Controls and Risk Management Responsibilities. Per reference (g) managers and analysts with responsibilities for determining entitlements, authorizing, or executing payments and collections, must perform periodic risk assessments of the program to ensure that adequate internal controls are in place and the activity funds are expended in accordance with all applicable laws, regulations, policies and guidance.

4. Incorrect treatment of mission related expenses may lead to a potential violation of appropriation law. Per reference (h) mission related expenses are not permitted to be charged on the GTCC or to be reimbursed on a travel voucher. Reimbursing these types of expenses on a travel voucher is a direct violation of the JTR, a potential violation of appropriation law, and directly conflicts with the requirements of audit readiness and the Office of Management and Budget's direction to reduce travel expenditures by 30 percent.

5. Questions concerning this correspondence should be addressed to BUPERS at telephone (703)-604-5424, or e-mail [BUPERS\\_FIAR@navy.mil](mailto:BUPERS_FIAR@navy.mil).

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By Direction