



DEPARTMENT OF THE NAVY  
OFFICE OF THE SECRETARY  
1000 NAVY PENTAGON  
WASHINGTON DC 20350-1000

SECNAVINST 12410.25A  
ASN (M&RA) (OCHR)  
12 Dec 16

SECNAV INSTRUCTION 12410.25A

From: Secretary of the Navy

Subj: CIVILIAN EMPLOYEE TRAINING AND CAREER DEVELOPMENT

Ref: See enclosure (1)

Encl: (1) References  
(2) Definitions  
(3) Responsibilities  
(4) Evaluation of Training and Career Development Programs  
(5) Employee Training and Career Development Program Policy Requirements  
(6) Accepting Contributions, Awards, and Payments from Non-Government Sources  
(7) Foreign Training Requirements

1. Purpose

a. To establish and implement policy, assign responsibility, and identify requirements for civilian employee training and career development within the Department of the Navy (DON). Guidance in this policy is in alignment and is consistent with the provisions of references (a) through (o).

b. This revised instruction establishes requirements for all DON civilian employees to create an Individual Development Plan (IDP) consistent with reference (a); encourages the use of telework during emergent situations to support the completion of mandatory, online, and distance training; requires the establishment of procedures for using Continued Service Agreements (CSAs); requires Human Resources Development Strategic Advisors (HRD SAs)/Training Managers to establish a Command Training Plan each year; and mandates that program managers must work with the Office of Civilian Human Resources (OCHR) for the establishment of mandatory training.

2. Cancellation. This policy cancels and replaces SECNAVINST 12410.25 of 5 July 2011 and Civilian Human Resources Manual Subchapter 410 of December 2003.

3. Definitions. See enclosure (2).

4. Applicability

a. This instruction applies to the Office of the Secretary of the Navy (SECNAV), the Chief of Naval Operations (CNO), the Commandant of the Marine Corps (CMC), and all U.S. Navy, U.S. Marine Corps installations, Commands, Activities, field offices, and all other organizational entities within the DON.

b. This instruction applies to all civilian employees paid from appropriated and non-appropriated funds to the extent permitted by law and applicable regulations. Certain provisions apply to military members who supervise DON civilian employees.

5. Policy. It is the DON policy:

a. To provide training to ensure that its civilian workforce possesses the skills needed to meet current and projected performance requirements.

b. To establish a needs assessment and fulfillment process that will incorporate the creation and update of IDPs for all civilian employees.

c. To invest sufficient resources and to monitor the effective use of those resources to meet immediate and long-range training requirements, ensure development of individual employee competencies, provide career development opportunities, and ensure that employees are afforded equal opportunity to acquire identified competencies during their career progression.

d. To systematically foster leadership development, succession planning, mentoring, and equality of opportunity to guide the development of employees consistent with established DON-wide goals.

e. To approve training and development on the basis of requirements generated from needs assessments, functional

community managers, law and regulations, and other sources such as performance appraisals, IDPs, position function, and approved organizational training plans.

f. To ensure that, to the extent possible, the Defense Civilian Personnel Data System (DCPDS) is used as the authoritative system of record for capturing completed training, education, and certifications. DCPDS is the system of record that will be used when providing all training data and reports associated with mandatory training requirements.

g. To have Program Managers or Project Leads who are responsible for programs with mandatory training requirements work with the DON OCHR to identify those training requirements and establish the official mandatory training course and reporting requirements. Mandatory training curriculum that Program Managers and Project Leads submit to the DON OCHR to establish as a mandatory course must be accessible to employees with disabilities and section 508 compliant per reference (a).

6. Responsibilities. See enclosure (3).

7. Authority. Heads of Major Commands/Budget Submitting Offices (BSOs) have delegated authority to establish and maintain training and career development programs within their Command to ensure employees have the skills needed to support optimum mission readiness. The civilian career development program requirements for each Command may vary to some extent. Commands are therefore authorized to further delegate elements of their training and career development program to the lowest level possible unless otherwise specified.

8. Procedures. Procedures and guidelines that must be followed in implementing this policy are located in enclosures (3) through (7).

9. Records Management. Records created as a result of this instruction, regardless of media and format, shall be managed per SECNAV Manual 5210.1 of January 2012.

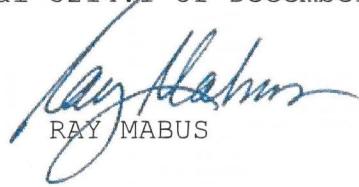
10. Forms and Reports

a. Form. Standard Form (SF) 182, Authorization, Agreement and Certification of Training is available electronically from

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the Department of Defense (DoD) Forms Management Library:  
[https://www.opm.gov/forms/pdf\\_fill/SF182.pdf](https://www.opm.gov/forms/pdf_fill/SF182.pdf).

b. Report. The reporting requirements contained in enclosure (3), paragraph 3h are assigned SECNAV Report Control Symbol 12410-2 per SECNAV Manual 5214.1 of December 2005.



RAY MABUS

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**REFERENCES**

- (a) DoD Instruction 1400.25, Vol. 410 of 25 September 2013
- (b) DoD Instruction 1430.16 of 19 November 2009
- (c) 5 CFR Part 410
- (d) 5 CFR Part 412
- (e) DoD Instruction 1400.25, Vol. 250 of 18 November 2008
- (f) SECNAV Manual 5210.1 of January 2012
- (g) NAVSUP Instruction 4200.99B of 12 September 2012
- (h) 5 U.S.C. Chapter 41
- (i) DoD Financial Management Regulation 7000.14R, Volume 10, Chapter 12 of September 2015
- (j) 48 CFR Chapter 2
- (k) SECNAVINST 1320.1
- (l) 10 U.S.C.
- (m) DoD Directive 5000.52 of 12 January 2005
- (n) DoD Instruction 5000.66 of 21 December 2005
- (o) DoD Instruction 1322.06 of 15 November 2007
- (p) 5 U.S.C. § 4111

## DEFINITIONS

1. Academic Degree. An award or title conferred by an educational institution that signifies the completion of a particular level of study, such as post-secondary education, in the form of an associate, a bachelor's or a master's degree, a doctorate, or a specialist program (e.g., a type of degree that is typically earned in addition to a master's such as an Education Specialist (Ed.S) degree). Institutions granting this type of degree must meet standards and accreditation criteria from an entity recognized by the U.S. Department of Education.
2. Accreditation. The voluntary process of evaluating institutions or programs to guarantee acceptable levels of quality. Additionally, recognition by the following agencies: Accrediting Agency Evaluation Branch Office of Postsecondary Education, U.S. Department of Education, and/or Council for Higher Education Accreditation.
3. Activity. A unit, organization, or installation performing a specific mission or function and established under a commanding officer or officer in charge.
4. Budget Submitting Office (BSO). A four-position alphanumeric code that identifies the major command that is authorized resources directly by the SECNAV, CNO, or CMC for the accomplishment of assigned missions and tasks.
5. Career Development Program. Structured plans, processes, and activities directing, as well as supporting the systematic organizational, occupational, and individual growth of employees in designated career fields. Entails a progression through a series of training and/or development programs and assignments involving broader knowledge, improved skills, or greater responsibility.
6. Certification. The recognition given to individuals who have met predetermined qualifications set by an agency of government, industry, or a profession.
7. Competencies. Observable and measurable skills, knowledge, abilities, behaviors, and other characteristics allowing individuals to perform work roles or occupational functions.

8. Continued Service Agreement (CSA). A contract between the employee and the Command, signed prior to the commencement of training, requiring the employee to either continue federal service as determined by the Command, for a period of at least three times the length of the training, or to repay the expenses incurred.
9. Development. Engagement of an employee in a set of learning experiences designed to achieve specific goals and long-term objectives. Learning experiences often occur in the workplace, and include coaching, mentoring, job rotation, developmental assignments, on-the-job training, and self-study courses.
10. DoD Civilian Leader Development Continuum. Depicts the progression of competencies needed as a DoD civilian rises through the leadership ranks, from fundamental competencies required of all leaders to strategic capabilities required of the most senior leaders.
11. DoD Civilian Leader Development Framework. The DoD Civilian Leader Development Framework defines five core leadership competencies and one technical core competency that DoD civilian leaders need to accomplish the 21st century national security mission. It also lists the 25 components of these core competencies, plus six fundamental competencies that form the foundation for success in each of the core competencies.
12. Education. Development of an employee's general knowledge, capabilities, and character through formal schooling in theories, concepts, and information. Traditionally delivered by an accredited institution. May relate to a current or future mission-related assignment.
13. E-Learning. A wide set of applications and processes, such as Web-based learning, computer-based learning, virtual classrooms, and digital collaboration. Includes delivery of content that may take place via Internet, intranet/extranet, local area network/wide area network, audio- and videotape, satellite broadcast, interactive television, DVD, and CD-ROM.
14. Formal Training Plan. A structured plan whereby a student follows a goal-oriented, planned program with measurable results at each phase. Completion of the formal training plan is often

followed by some form of formal recognition, such as a certificate. Some examples of employees on formal training plans include employees occupying intern positions, apprenticeship positions, Civil Service Mariner positions, and Veterans' Readjustment Appointment positions.

15. Human Resources Development Strategic Advisor (HRD SA). An individual who manages and consults on training, education, and professional development programs essential for organizational productivity, individual proficiency, and personal career growth.

16. Individual Development Plan (IDP). A tool used to assist employees in career and personal development. Its primary purpose is to help employees reach short- and long-term career goals, as well as improve competencies. An IDP is not a performance evaluation tool or a one-time activity. It should be executed as a partnership between the employee and the supervisor. It involves preparation and continuous feedback. IDPs are mandatory for all employees. IDPs do not imply or provide a guarantee of requested training.

17. Intermittent Positions. Positions in which work occurs at sporadic or irregular intervals so that an employee's tour of duty cannot be scheduled in advance of the administrative work week.

18. Learning. Cognitive and/or physical process where a person assimilates information. Temporarily or permanently acquires or improves skills, knowledge, behaviors, and/or attitudes.

19. Licensing. The process by which a government agency (federal, state, or local) grants permission to an individual to engage in a given occupation upon finding the applicant has attained the minimum degree of competency required to engage in that occupation.

20. Mandatory Training. Training mandated by executive order, federal statute, regulation, or at the direction of the SECNAV or Assistant Secretary of the Navy (Manpower and Reserve Affairs) (ASN (M&RA)).

21. Merit System Principles. The basic standards governing the management of the executive branch workforce. The principles

are part of the Civil Service Reform Act of 1978 and can be found in section 2301(b) of 5 U.S.C.

22. Mentoring. A developmental process under which a senior or more experienced individual (the mentor) is assigned to act as an advisor, counselor, or guide, providing support and feedback to a junior or trainee (the mentee).

23. Nationally Recognized Body. A regional, national, or international accrediting organization recognized by the U.S. Department of Education.

24. Occupational (Functional) Training Needs. Professional skills and knowledge personnel in specific occupations must acquire and maintain to perform current and future work of the organization.

25. Off-the-Shelf Training. Any commercially available training event or planned series of the same training event, activity, service, or material requiring no modification prior to use. Such training may occur on or off federal property and may include non-Federal employees.

26. Organizational Training Needs. Broad performance requirements leading to maintaining competencies, solving problems, effecting changes, and meeting projected goals of the organization.

27. Required Training. Training that is required and regulated for employees by the CNO, CMC, or Command leadership. This training is only required for employees who work under their authorities.

28. Strategic Human Capital Plan (SHCP). The full range of ongoing activities required to determine, plan for, and staff the workforce.

29. Succession Planning. A systematic approach that incorporates merit systems principles, providing fair and equitable opportunities, to build a pipeline to ensure workforce continuity. Develops potential successors in ways that best fit their strengths, identifies the best candidates for categories of positions, and concentrates resources on talent development.

30. Training. A planned and coordinated program of instruction in professional, technical, or other field that will improve individual and organizational performance and assist in achieving the agency's mission and performance goals. Training can be accomplished through a variety of approaches such as traditional classroom training, correspondence course or self-study, online courses, university/college course, distance learning, professional conferences, seminars, and workshops that are educational or instructional in nature.

31. Temporary Employees. Employees who are under an appointment that does not exceed one year.

32. Term Employees. Employees who are under an appointment that exceeds one year, but not more than four years.

## **RESPONSIBILITIES**

1. The ASN (M&RA) is responsible for the issuance of Civilian Employee Training and Career Development Program policy and for delegation of authority in the DON per reference (a).
2. The Deputy Assistant Secretary of the Navy (Civilian Human Resources (DASN (CHR)) is responsible for management, oversight, and administration of the DON's Civilian Employee Training and Career Development Program.
3. The Director, OCHR is responsible for interpreting statutory and regulatory guidance as it is received and for the preparation of implementing guidance as applicable. The Director of OCHR shall:
  - a. Provide guidance for assessing, evaluating, procuring, and aligning training to the DoD Leader Development Framework and Continuum as outlined in reference (b).
  - b. Monitor DON leader development programs to facilitate measuring program effectiveness and alignment to the DON's SHCP.
  - c. Assess the need for DON-wide civilian leadership training and career development programs and establish and/or manage DON-wide leadership programs.
  - d. Establish guidance for conducting gap analyses to identify skill shortages and to facilitate the development of training plans needed to close gaps in deficient skill areas.
  - e. Provide civilian employee training and career development advice and policy guidance to Major Commands.
  - f. Establish annual civilian employee training, education, and career development reporting requirements.
  - g. Establish guidance for using a CSA as a condition of employment for civilian employees attending training activities or programs of substantial duration or cost.
  - h. Publish an annual list of mandatory training and monitor training completion rates captured in DCPDS. Submit official

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reports to the DoD, Office of Personnel Management (OPM), U.S. Government Accountability Office, and others as requested.

(1) Mandatory training is defined as training mandated by Executive Order, Federal statute, regulation, or at the direction of the SECNAV or ASN (M&RA).

(2) Other training directed by any formal office may be considered required and should follow the documenting requirements included within those policies.

4. Directors of OCHR Operations Centers are responsible for maintaining a civilian employee training and career development office that is responsible for:

a. Human Resources (HR) community course administration, to include:

(1) Assessing annual learning needs and managing the demand survey process.

(2) Creating annual HR community training schedules.

(3) Managing HR course inventory.

(4) Managing the HR course evaluation process.

(5) Managing HR train the trainer sessions.

b. Providing advice and guidance on civilian employee training and career development to its serviced population.

c. Uploading training completion records to DCPDS via the Mass Upload Spreadsheet and assisting Commands in correcting errors in training related reports.

d. Managing vendor administration for OCHR-contracted courses.

5. The CNO, the CMC, and Department of the Navy, Assistant for Administration are responsible for ensuring this policy is implemented within their respective organizations.

6. The Heads of Major Commands/BSOs are responsible for establishing, aligning, and implementing civilian employee training and career development programs needed to meet the short-term and long-term SHCP of the DON and their Commands. This includes establishing administrative policies and providing adequate staffing to ensure that training being conducted or planned shall improve the performance of civilian employees and contribute to economy, efficiency, and the attainment of internal mission and program goals. Program development and implementation responsibilities may be delegated to subordinate Commands to meet organizational or operational needs. The heads of Major Commands/BSOs shall:

- a. Ensure subordinate Commands and Activities comply with statutes, regulations, policy, and guidance from higher level authorities (e.g., DASN (CHR), DoD, and OPM).
- b. Plan, program, budget, operate, and evaluate programs within the stated DON, DoD, and OPM policy as well as guidance per references (a) through (o).
- c. Establish, implement, and update annually a five year plan to evaluate training programs to improve program effectiveness, efficiency, and economy with a focus on support of mission critical positions.
- d. Identify necessary funds and resources to meet training priorities, educational requirements, and plans.
- e. Integrate employee training, education, and career development into the strategic planning process to ensure each contributes to employee professional development and organizational performance goals and is aligned with organizational succession plans per references (a) through (d).
- f. Create an environment that fosters continuous learning for all civilian employees.
- g. Ensure merit systems principles are adhered to in providing fair and equitable opportunities for training and development.
- h. Implement DoD and DON-wide career and leadership development programs per references (a) through (d).

i. Ensure completed training, education, and certifications are recorded in DCPDS, to the extent possible, within 30 days of training completion.

j. Appoint an individual to serve as the HRD SA/Command Training Manager to oversee civilian training across the Command and to communicate with the OCHR Civilian Workforce Development Division (CWDD).

k. Evaluate training to determine how well it meets short- and long-range mission requirements.

l. Fulfill statutory and contractual bargaining obligations with designated representatives of local unions prior to implementation of any civilian employee training and career development programs.

7. Human Resources Directors are responsible for:

a. Advising Activity managers and supervisors on the proper execution of their authorities and responsibilities as it applies to civilian employee training and career development.

b. Promoting that educational, technical, and leadership training opportunities should be provided to all individuals.

c. Assisting Heads of Major Commands/BSOs and Activities in conducting periodic assessments of civilian training and career development programs.

8. HRD SAs/Command Training Managers are responsible for:

a. Supporting the OCHR CWDD with the communication/distribution and coordination of programs that Command leadership supports.

b. Providing advice, guidance, and assistance to managers, supervisors, and employees within the Command on civilian training and development.

c. Monitoring compliance Command-wide for mandatory training requirements.

d. Establish, implement, and annually update Command Training Plans, programs, and budgets that support the incorporation and use of the best training practices and techniques. These plans should raise the level of civilian employee performance to meet present and anticipated requirements for administrative, technical, professional, supervisory, managerial, and executive competencies.

9. Managers and Supervisors are responsible for:

a. Supporting and executing civilian employee training and career development policies.

b. Assessing employee competencies for the purpose of identifying training and career development needs.

c. Ensuring subordinates complete all applicable mandatory training.

d. Ensuring all civilian subordinates develop an IDP per reference (a). IDPs should be developed through collaboration of supervisors and their subordinates and should focus on targeted proficiency levels, identifying specific needs for new or refined competencies, continuing education, professional development, and organizational, functional, or occupational training required to improve performance. For employees on formal training plans, those training plans may be attached as a supplement to the IDP.

e. Providing information about training and development policies, responsibilities, procedures, and opportunities to new employees during the initial stages of their entrance on duty, typically within their first 30 days, as well as on a continual basis.

f. Permitting and encouraging employees to use telework, as appropriate and per local Command policies, to complete training, and/or to complete online mandatory training during recurrent, situational, and/or emergency closures of the government (e.g., weather-related closures).

**EVALUATION OF TRAINING AND CAREER DEVELOPMENT PROGRAMS**

1. Minimum Requirements. Commands must annually evaluate their training, leadership, and mentoring plans and programs to determine how well such plans and programs contribute to mission accomplishment and meet organizational performance goals. All DON leadership programs must be in alignment with the DoD Civilian Leader Development Framework and Continuum which can be found in reference (b) and on the DoD Defense Civilian Personnel Advisory Service (DCPAS) website. Each Command shall conduct evaluations for:
  - a. Courses of more than 80 hours in duration which are funded by the DON;
  - b. Courses costing more than \$2,500; and
  - c. Formal mentoring programs.
2. Evaluation Guide. The "Training Evaluation Field Guide" is available for guidance on conducting an evaluation of training programs on the OPM website at <https://www.opm.gov/policy-data-oversight/training-and-development/reference-materials/training-evaluation.pdf> and the Training and Development page of the OCHR private portal at <https://portal.secnav.navy.mil/orgs/MRA/DONHR/Training/Documents/OPM%20Training%20Evaluation%20Field%20Guide.pdf>.
3. Records. Commands are required to maintain evaluation records of their training programs for a period of three years per reference (f).

**EMPLOYEE TRAINING AND CAREER DEVELOPMENT PROGRAM POLICY  
REQUIREMENTS**

Reference (a) requires Commands to operate under written policies governing the training of their employees. The following requirements are to be incorporated in the Command's policies and programs:

1. Learning Needs Assessment

a. Training Delivery Methods. Commands may use a full range of developmental activities to meet mission-related organizational and employee development needs, such as classroom training, on-the-job training, technology-based training, satellite training, employee self-development activities, coaching, mentoring, details, rotational assignments, and cross training.

b. Identification of Training Needs. Managers and supervisors are responsible for determining organizational and individual training needs at least annually per references (a) and (d). Individual training needs should be determined in conjunction with applicable performance appraisal cycles. Designated Activity officials, such as HRD SAs/Command Training Managers or equivalent, are to ensure that all approved training is in full compliance with governing laws and directives.

c. IDPs. Commands must base approval of training, educational, and professional development activities for civilian employees on their IDPs. IDPs are required for all employees to assist in developing strengths, career planning, and as a guide to help close competency gaps. Per reference (a), Commands must monitor the execution and evolution of IDPs to ensure civilian employees are provided appropriate opportunities to satisfy identified training needs.

(1) IDPs should be developed through collaboration of supervisors and their subordinates and should focus on targeted proficiency levels, identifying specific needs for new or refined competencies, continuing education, professional development, and organizational, functional, or occupational training required to improve performance. For employees on formal training plans, those training plans may be attached as a supplement to the IDP.

(2) The IDP is an ongoing, continuous process and should be periodically reassessed to determine its effectiveness. At a minimum, an IDP should be reviewed semi-annually. An IDP is not a binding contract. Every effort should be made by supervisors and employees to follow the IDP, however, some circumstances may require modifications to the IDP.

(3) Organizations may assign their employees to training and development activities required for current or anticipated duties related to the mission of the Command or the DON.

(4) In emergency situations, training that has not been included in an IDP may be approved. Commands must specify the circumstances that would constitute an emergency exception and establish appropriate approval processes.

d. Command Training Plan. At a minimum the Command Training Plan should be reviewed annually to determine training needs and anticipated costs necessary to accomplish organizational objectives per references (a). Guidance for conducting needs analysis can be found on the OPM Training and Development Policy website.

2. Prioritizing Training. Every training and development need must be assigned a priority. This priority allows the Command to allocate training funds to those training needs which have the most urgency. A priority must be specified for all types of formal training. The following priorities should be used for all training, including mission critical, occupational, and/or functional skill training:

a. Priority I - Mandated/Critical

(1) Mandatory training as defined in this instruction as training mandated by executive order, Federal statute, regulation, or at the direction of the SECNAV; or

(2) Training that is typically a condition of employment, including but not limited to certifications and/or licensures required by the position; or

(3) Training required during the forthcoming annual training cycle considered essential to mission accomplishment; or

(4) Training needed to ensure attainment of performance objectives, to close competency gaps, or to correct serious performance deficiencies which adversely impact mission accomplishment; or

(5) Training that must be successfully completed within a specified time period.

b. Priority II - Essential

(1) Training which, if omitted, might adversely impact mission accomplishment in the next two or three fiscal years; or

(2) Training to provide for systematic replacement of skilled workers.

c. Priority III - Recommended

(1) Training of a broadening nature that is helpful in enhancing the overall performance levels of employees already considered competent; or

(2) Training recommended for individuals to improve or enhance competencies needed to perform the job.

3. Documenting Completed Training. To the extent possible, all instances of completed civilian training must be recorded and entered into the DCPDS. DCPDS is the authoritative system of record for capturing completed training, education, and certifications. The DCPDS is the system of record that will be used when providing training data and reports associated with mandatory and regulatory training requirements.

a. Courses completed in DON systems such as Navy eLearning/Navy Knowledge Online, Total Workforce Management Services (TWMS), and Navy Enterprise Resource Planning are uploaded routinely into DCPDS.

b. Courses completed outside of DON systems should be recorded into an employee's training record through the MyBiz Self-Service, TWMS Mass Update process, or the DCPDS Mass Upload Spreadsheet.

(1) DCPDS Mass Upload Spreadsheet - HRD SAs/Command Training Managers may verify training completion and enter training into employee training records in DCPDS through a Mass Upload Spreadsheet. To receive verified course credit, employees should provide their course completion certificate to their HRD SA/Command Training Manager. The DCPDS Mass Upload Spreadsheet can be found under Training Resources on the Training and Development page of the OCHR private portal at <https://portal.secnav.navy.mil/orgs/MRA/DONHR/Training/Pages/Training-Resources.aspx>.

(2) TWMS Mass Update process - HRD SAs/Command Training Managers with approved access may enter employee training completions through the Mass Update process within the TWMS System. A job aid on this process can be found under Training Resources on the Training and Development page of the OCHR private portal. Records updated through TWMS may take additional time to process into the training records available on DCPDS.

(3) MyBiz Self-Service - Employees may enter completed training into their training record through MyBiz Self-Service. Trainings entered by the employee in the self-service system will be listed as self-certified. A job aid on how to complete self-service records can be found under Training Resources on the Training and Development page of the OCHR private portal.

#### 4. Funding Training Expenses

##### a. Determining Training Expenses

(1) Heads of Commands determine which expenses constitute training expenses and may pay or reimburse an employee for necessary expenses, such as application fees, registration fees, tuition, books, equipment, supplies, and parking fees, incurred in connection with approved training per reference (c). Training expenses do not include an employee's pay or other compensation.

(2) All payments or reimbursements for expenses are discretionary and should be based on Command needs, talent availability, and other mission-related criteria and standards

established by the Command. Employees must obtain prior approval before incurring any expenses for which they are requesting reimbursement from the Command.

b. Leveraging Military Training. Military training sources open to civilians, including education and professional development, should be utilized, where possible, in further support of the total force approach to mission execution per DoD Directive 1322.18.

c. Protection of Government Interest. Heads of Commands shall establish procedures necessary to protect the government's interest when employees fail to successfully complete training for which Commands pay the expenses.

d. Conferences as a Training Expense. As per reference (a), employee attendance at a conference may be considered a training expense if the purpose of the conference is educational; more than half of the time is spent in planned, organized sessions between presenters and audience; the content of the conference is germane to the organization's mission; and the conference will assist in improving the employee's performance and contribute to the employee's development. Conference attendance should be requested following the most recent conference guidance as well as local Command policy.

e. Adjustment of Work Schedules. Supervisors have the authority to adjust an employee's normal work schedule for educational purposes to allow an employee to take college or university coursework per 5 CFR 610.122. The head of the Command may authorize a special tour of duty of no less than 40 hours that meets the following conditions:

(1) Courses taken are not training under 5 U.S.C. chapter 41;

(2) The tour of duty does not appreciably interfere with work accomplishment;

(3) Schedule adjustment will not cause the Command to incur any additional costs;

(4) Completion of the courses will equip the employee to work more effectively; and,

(5) Except as provided in 5 CFR 410.402, the employee receives no premium pay while on the adjusted schedule, even if it would otherwise entitle them to premium pay.

f. Salary. The Activity will pay the salary of all employees attending Command-approved training during their normal work hours with the exception of displaced and surplus employees under the authority of reference (c).

g. Travel. If an employee is approved for training by the Command and travel is required for successful completion, Commands must ensure funding is provided. Employees may not be permitted to travel on "no cost orders" per the Joint Travel Regulations.

h. Records of Training Expenses. Each Activity shall maintain records of correspondence, memoranda, agreements, authorizations, reports, requirement reviews, plans, and objectives relating to the establishment and operation of training courses and conferences for five years per reference (f). In addition, per reference (g) each Activity must retain certified billing statements and supporting documents, including purchase logs for six years, three months; and ten years for documents using Foreign Military Sales funding.

5. Allocation of Resources, Prioritizing, and Funding Training. Reference (a) provides guidance for paying the costs of training from appropriations made for the purpose of training or from other funds available notwithstanding exceptions outlined above. Training costs associated with an approved training program may be funded by appropriations applicable to that program area. In addition, reference (c) provides the authority for agencies to share the expenses of training with employees. This authority allows Commands to support training and education that benefits both the DON and the employee. If agreed upon by both the Command and the employee, a Command may pay for some of the costs of training while the employee pays the balance or a Command may also reimburse an employee for all or part of the costs of the training. Specific guidance on allocating resources for academic degrees can be found in paragraph 7 of this enclosure. Employees not covered under this instruction may utilize DON training resources as follows:

a. Military Personnel. Military personnel may attend civilian training programs when the training is related to their present duty assignment and they:

(1) Have direct or indirect supervision over civilians; or,

(2) Are officially assigned to a regularly scheduled, on-site civilian training course at no additional cost to the government; or,

(3) Are attending a non-supervisory course on a space available basis that is directly related to, or required by, the military member's current duties; or,

(4) Are attending non-supervisory courses on a space available basis as per the Defense Acquisition Workforce Improvement Act. Civilian employees shall not be displaced by a military member attending civilian courses.

b. Other Government Employees

(1) Employees of other government agencies on details or rotations to a DON Command or Activity, including state and local governments, may participate in training at DON facilities and schools in classroom or on-the-job training, or through existing training agreements. These employees may not displace DON employees, and reimbursement to the DON can be required in these instances;

(2) Employees from other DoD components may be trained in DON facilities on a space available basis. These employees may not displace DON employees, and reimbursement to the DON can be required in these instances;

(3) Temporary and intermittent employees are eligible to attend training in non-government facilities when critically needed skills can be obtained at less cost through such training. Appropriate records of such instances are to be maintained at the Activity level;

(4) Employees from non-DoD agencies may be trained in DON facilities on a space available basis. Reimbursement to the DON may be required in these instances; and,

(5) Non-DON agencies may request the use of qualified DON instructors and facilities.

6. Use of Standard Form 182 (SF-182)

a. SF-182. The SF-182 or any formalized automated system that captures the SF-182 data elements are authorized for use by DON Activities to document trainee information, training course data, costs and billing information, concurrences, approvals, and certification of training completion and evaluation as well as a binding agreement to CSAs for training through a government or non-government training facility.

b. Responsibilities. HRD SAs/Command Training Managers or Command Training Officers at Activities must ensure that all approved documents, such as SF-182s, are in compliance with regulations. Employees may not attend training until all certification and approval signatures are obtained.

c. Payment. Per reference (a), DON Commands may use the government-wide Commercial Purchase Card (GPC) or other contracting vehicle in concert with the SF-182 to purchase and pay for training, education, and professional development services. The following provisions must be met per reference (g):

(1) The price of the training, education, or professional development service does not exceed the micro-purchase threshold as defined in section 213.201 of reference (j); or

(2) For purchases exceeding the micro-purchase threshold but not exceeding \$25,000 (excluding travel and per diem):

(a) The duly appointed GPC cardholder is trained on DON procedures for purchasing training, education, and professional development services using the SF-182 or other approved electronic system.

(b) The training, educational, or professional development event is for a regularly scheduled, off-the-shelf training, educational, or professional development service that

is available to the general public and priced the same for everyone in the same category (i.e., price per student, course, program, service or training space).

(c) A price comparison is completed to determine price reasonableness and source selection has been justified and documented.

(3) Any training, educational, or professional development services acquisition requiring new design or development or with a price exceeding \$25,000 for a training, educational, or professional development event must be acquired under provisions of reference (j) by a warranted contracting officer.

(4) Internal controls must be used to ensure compliance with procedures and accountability for the expenditure of funds.

d. Unauthorized Use of the SF-182. The SF-182 may not be used to substitute formal acquisition procedures, purchase, or contract for training. In cases where use of the SF-182 is not authorized, the Activity contracting officer makes determinations on appropriate procurement procedures for training services, products, courses, etc. In addition, when a service or training need is identified that falls within the general terms of an established procurement agreement, the Activity must execute a separate contract for each service desired.

e. Reimbursement. A Command may pay directly for, or reimburse an employee for, expenses incurred in connection with training approved in advance as provided reference (h). Necessary training expenses do not include an employee's pay or other compensation.

7. Academic Degree Program. Commands may select and assign employees to academic degree training and may pay or reimburse employees for all or part of the necessary direct and indirect costs of such training.

a. Selection Process. The selection of employees to an academic degree training program must be done fairly and equitably per Merit Systems Principles, without regard to political affiliation, race, color, religion, national origin,

sex, marital status, sexual orientation, status as a parent, age, or handicapping condition. The selection and assignment must be accomplished to meet one or more of the criteria outlined in reference (i), to meet identified agency training needs, to resolve an identified Command staffing problem, or to accomplish the objectives of a Command's strategic plan.

Therefore, Commands must establish policy to publish opportunities to the entire eligible population, competitively select and assign employees to an academic degree training program that qualifies the employee for promotion to a higher graded position or to a position that requires an academic degree. Per reference (a), and except as provided for the acquisition, technology, and logistics workforce, Commands must ensure that training is not for the sole purpose of providing an employee the opportunity to obtain an academic course, certificate, or degree, or to qualify for appointment to a particular position for which the academic course, certificate, or degree is a basic requirement.

b. Accreditation. Participating colleges and universities must be accredited as a nationally recognized body by the U.S. Department of Education. The listing of national accrediting bodies is available on the U.S. Department of Education's website.

(1) Academic degree payment is not authorized to an institution of higher education or any sub-element of that institution that discriminates on the basis of political affiliation, race, color, religion, national origin, sex, marital status, sexual orientation, status as a parent, age, or handicapping condition.

(2) Academic degree payment is not authorized to an institution of higher education or any sub-element of that institution if either the parent institution or any sub-element of that institution has a policy or practice that prevents Reserve Officers Training Corps (ROTC) units, student ROTC participation, military recruiting on campus, or access to student directory information per reference (a).

(3) Per reference (a), academic degree payment is not authorized if the institution or program facility and curriculum are not accessible to employees with disabilities.

c. Allocating Resources for Academic Degree Programs

(1) Funding. Only individuals competitively selected and participating in planned, systematic, and coordinated professional development programs are authorized funding. Such programs must meet both of the following criteria as per reference (a):

(a) Financial support for the program is pre-planned rather than ad hoc; and

(b) The program consists of a sequenced set of instruction, courses, or assignments that support organizational objectives and/or are necessary for degree attainment.

(2) Funding Additional Expenses. Funding may include such additional expenses that may be necessary to ensure successful participation including, but not limited to books, supplies, equipment, application fees, registration, and parking fees.

(3) Recruitment and Retention. Costs associated with obtaining an academic degree may be paid in an effort to recruit and retain employees. Payments are not restricted to occupations in which there is a shortage of qualified personnel identified as per reference (a).

d. Restrictions. Academic degree payment is not authorized for non-appropriated fund employees, employees occupying Schedule C and non-career (political) Senior Executive Service (SES) positions as per reference (i).

(1) Failure to complete or earn a passing grade in a course where tuition assistance was provided could result in repayment to the government. Each Command is responsible for providing specific guidance on tuition assistance.

(2) Any bargaining obligations must be satisfied prior to implementation of this subchapter as per reference (a).

(3) This authority does not apply to the Navy Student Loan Repayment Program.

8. Academic Courses and Certificates

a. Commands may pay or reimburse employees from appropriated or other available funds for all or part of the direct and indirect costs of enrolling in individual academic courses or a series of courses leading to an academic certificate relating to the current position of the employee or the current or future mission requirements of the employee's organization.

b. Institutions offering individual academic courses, programs, and certificates must be accredited as listed in the U.S. Department of Education's Database of Accredited Postsecondary Institutions and Programs and meet all of the conditions listed under paragraph 7b of this enclosure.

c. To promote fair, equitable treatment of civilian employees, Commands must provide supervisory, managerial, and executive oversight of training and development activities and/or programs. This oversight shall ensure adherence to equal employment opportunity regulations, merit system principles, and collective bargaining obligations. The use of funds under this authority must be reviewed annually for accountability and compliance.

d. Only officials with budget authority may approve the use of appropriated funds or funds otherwise available to pay for academic courses and certificates.

e. Payment or reimbursement for academic courses and certificates may include expenses such as application fees, registration fees, tuition, books, equipment, supplies, and parking fees. Commands may also grant administrative leave to an employee for specific purposes, such as applying for admission, registering for classes, and purchasing books and other required items.

f. All payments or reimbursements for expenses and all grants of administrative leave are discretionary (i.e., not an employee entitlement, and should be based on organizational need, talent availability, and other mission-related criteria and standards established by the Command). Employees must obtain prior Command approval before incurring any expenses for which they are requesting reimbursement from the Command.

g. Commands must ensure that the training is not for the sole purpose of providing an employee the opportunity to obtain an academic course, certificate or degree (unless the provisions of paragraph 7 of this enclosure are met), or qualify for appointment to a particular position for which the academic course, certificate, or degree is a basic requirement, except for DON acquisition, technology, and logistics workforce personnel per section 1745 of reference (l), and references (m) and (n). Academic degree training must be authorized and approved per paragraph 7 of this enclosure.

9. Payment of Expenses to Obtain Professional Credentials

a. Payment of costs associated with obtaining and renewing professional credentials including professional accreditation, state-imposed and professional licenses, and professional certifications; and examinations to obtain such credentials is authorized per reference (a) to support the DON's human capital goals. Dependent on the availability of funding, Commands may pay for professional credentials that are necessary or beneficial in the performance of an employee's official duties as per reference (a).

b. This authority will be implemented in a manner consistent with Merit Systems Principles as set forth in reference (a) and as described by the following criteria when the license or certification:

(1) Enhances productivity;

(2) Improves performance;

(3) Maximizes recruitment opportunities, especially for shortage category occupations and other labor market conditions;

(4) Increases retention, especially for "high turnover" career fields; and,

(5) Broadens and develops the skill base for a quality workforce to accomplish the DON's mission and ensure readiness.

c. Payment or reimbursement for initiation fees or periodic dues for membership in a professional organization or expenses

for attendance of a member at meetings or conventions of the organization is prohibited unless:

(1) Membership or attendance is a prerequisite to acquiring or maintaining a required professional credential.

(2) The Command pays for an employee to acquire or maintain a professional credential and the employee maintains a membership in the professional organization as an incidental by-product of acquiring or maintaining the credential and attends its meetings or conventions to maintain the credential.

d. Per reference (a), payment or reimbursement for expenses of voluntary memberships in professional organizations of already credentialed employees is prohibited. Payment or reimbursement may be made for expenses of employees attendance at a meeting or convention related to the functions or activities for which appropriations available to DoD Components for travel expenses were made, or that will contribute to improved conduct, supervision, or management of those functions or activities.

e. All payments or reimbursements for expenses are discretionary and should be based on organizational need, talent availability, and other mission-related criteria.

f. Employees must obtain prior approval before incurring any expenses for which they are requesting reimbursement.

10. CSA

a. Requirements. Heads of Commands shall establish written procedures which include the minimum requirements for CSAs. These requirements shall include procedures the Command considers necessary to protect the government's interest and collect repayment should the employee fail to successfully complete any training program, course, or instructional event.

(1) An employee selected for training may be subject to a Command CSA and must sign an agreement to continue in service prior to obligation of funds for any training program, course, or instructional event, if required.

(2) A CSA is required for all training programs, courses, and instructional events in excess of 160 hours; however, Commands may determine training of shorter durations or high costs to be appropriate to require CSAs per reference (a).

(3) If the employee received salary covering the training period, or received academic training as outlined in this enclosure, the CSA must provide for continued service with the Command after training for at least three times the length of the training period. Commands may establish longer minimums as appropriate. If academic training has been received, the continued service may begin on the day after all requirements for the degree, certificate, or course have been met.

(4) If the employee received no salary covering the training period, the CSA must provide for continued service with the Command after training for a period equal to at least the length of the training, but in no case less than one month. Commands may establish longer minimums as appropriate.

(5) The length of a part-time training period is the number of hours spent in class or with the instructor. The length of a full-time training period is eight hours for each day of training, up to a maximum of 40 hours a week. For an academic degree, certificate, or course authorized and approved, the length of the training period must be based on the number of contact hours established by the academic institution.

(6) A CSA must be signed by the nominee for training prior to the commencement of training for which the Command approves payment of training costs. Commands may not require an employee to sign a CSA after the training commences.

b. Failure to Fulfill Agreements or Complete Course

(1) Commands must establish procedures to protect government interests when an employee fails to complete or successfully complete approved training when the Command pays for that training.

(2) Heads of Commands must ensure the CSA includes provisions for an employee to reimburse the Command for training costs, except pay or other compensation, if the employee voluntarily separates from federal service before completing the

agreed period of service or is involuntarily separated for cause or poor performance before completing the agreed period of service.

(3) Heads of Commands must ensure the CSA provides for reimbursement of training costs, except pay and other compensation, in instances when an employee voluntarily leaves the Command for service in another DON Command, DoD Component, or other organization in any branch of the federal government before completing the agreed upon period of service.

c. Recovery of Funds. When repayment cannot be obtained directly from the employee, action to recover funds may be taken per reference (a).

d. Waiver of Repayment. The Command head is authorized to waive any part of an employee's obligation to pay training expenses when a waiver is deemed in the best interest of the government, or when recovery would be contrary to equity and good conscience or the public interest. This authority may not be delegated. Denial of a waiver request may be appealed to the next higher level of management in the chain-of-Command where a final DON decision must be rendered.

e. Protection of Government Interests. Commands shall establish procedures to protect government interests when an employee fails to complete or successfully complete approved training when the Command pays for that training.

f. Computing Time in Training. For the purpose of computing time in training for a CSA under reference (a):

(1) An employee on an eight hour a day work schedule assigned to training is counted as being in training for the same number of hours he or she is in pay status during the training assignment. If the employee is not in pay status during the training, the employee is counted as being in training for the number of hours he or she is granted leave without pay for the purpose of the training.

(2) For an employee on an alternative work schedule, the Command is responsible for determining the number of hours the employee is in pay status during the training assignment. If the employee is not in pay status during the training, the

employee is counted as being in training for the number of hours he or she is granted leave without pay for the purpose of the training.

(3) For employees on a compressed work schedule (CWS), Commands may require that the employee be placed on a standard work schedule (eight hours per day) for any pay period(s) in which training or travel would require the employee to perform job duties on a day that would normally be the employee's regular day off. After completion of the training and/or travel event, the employee may be restored to their CWS following local Command policy.

(4) An employee on an eight hour or an alternative work schedule assigned to training on less than a full-time basis is counted as being in training for the number of hours he or she spends in class, in formal computer-based training, in satellite training, or in formal self-study programs unless a different method is determined by the Command.

(5) When an employee is pursuing an academic degree through a Command's academic degree training program, formally established in written policy, the Command may compute the length of the academic degree training period based on the academic institution's official calendar.

11. Fellowships, Scholarships, Training with Industry (TWI), and Grants. In accordance with reference (k), employees may accept fellowships, scholarships, TWI opportunities, and grants from corporations, foundations, funds, or educational institutions organized and operated primarily for scientific, literary, or educational purposes.

12. Other Professional and Career Development Programs. DON Commands may participate in other professional and career development programs. Examples of such programs include, but are not limited to, the following:

a. Developmental assignments that provide Commands a way to enhance competencies by giving employees an opportunity to perform duties in other occupational, functional, or organizational elements. This enhances employee understanding of other operations, systems, and relationships.

(1) The length of the assignments may vary and may include such assignments as special projects, cross training, job exchanges, shadow assignments, details, temporary reassessments, and temporary promotions.

(2) These opportunities must have a well-defined learning objective and be established in conformance with all applicable civilian personnel management regulations pertaining to work assignments, details, reassessments, and promotions.

(3) Developmental assignments outside of the DoD must be implemented per reference (o).

b. Use of the Intergovernmental Personnel Act Mobility Program for temporary assignment of personnel between Components and other federal agencies, State and local governments, Indian tribal governments, institutions of higher education, federally funded research and development centers, and other eligible institutions. It is a vehicle for developing employees by providing experiential opportunities in settings and organizations outside the permanent position of the employee.

c. Mobility programs that provide Commands with a way to develop employee competencies and enhance career progression as part of an overall civilian workforce development strategy to improve mission effectiveness.

d. The National Security Professional Development Program, a government-wide initiative to develop a cadre of national security professionals through access to education, training, and professional opportunities to enhance mission-related knowledge, skills, abilities, and experiences per Executive Order 13434.

### 13. Prohibited Practices

a. Premium pay to an employee engaged in training activities is prohibited except as provided in 5 C.F.R. 410.402.

b. An employee who is attending a course of training, education or professional development paid for by a Command may not receive another financial benefit from another source for the same course, that combined, exceed the actual cost.

c. Academic institutions that prevent Senior ROTC access or military recruiting on campuses are ineligible to receive federal funds, except as provided by section 983(c) or section 983(d)(2) of reference (1).

d. In accordance with reference (a), appropriated funds may not be used for a training activity that is offensive to employees and unnecessary in the execution of current or anticipated duties.

(1) These restrictions apply to training activities that could induce high levels of emotional response or psychological stress; do not require prior employee notification of the content and methods to be used in the activity and written end-of-course evaluations; contain any methods or content associated with religious or quasi-religious belief systems or "new age" belief systems; or is offensive to, or designed to change participants' personal values or lifestyle outside of the workplace.

(2) Training on the human immunodeficiency virus (HIV) or acquired immune deficiency syndrome (AIDS) may not be made mandatory, except for HIV/AIDS training necessary to protect the health and safety of the employee and individuals served by the employee.

(3) These restrictions are not intended to prohibit, restrict, or otherwise preclude Commands from conducting training activities bearing directly upon the performance of official duties.

**ACCEPTING CONTRIBUTIONS, AWARDS, AND PAYMENTS FROM NON-GOVERNMENT SOURCES**

1. A Command head may authorize an employee in writing to accept a contribution or award (in cash or in kind) incident to training, or to accept payment (in cash or in kind) of travel, subsistence, and other expenses incident to attendance at a meeting, as per subpart E of reference (c) and reference (p) if:
  - a. The organization providing the contribution, award, or payment is certified as a 501(c)3 tax-exempt organization by the U.S. Treasury;
  - b. The contribution, award, or payment is not a reward for services previously rendered;
  - c. Acceptance of the contribution, award, or payment would not:
    - (1) Prevent an employee from performing their duties in a fair and objective manner;
    - (2) Compromise the honesty and integrity of the government or its employees;
  - d. The contribution, award, or payment is given per the Ethics in Government Act of 1978, as amended; and,
  - e. It would otherwise be proper and ethical for the employee concerned given the circumstances of the particular case.
2. When more than one non-Government organization participates in making a single contribution, award, or payment (whether in cash or in kind), the "organization" to which this enclosure applies is the organization which selects the recipient and administers the fund from which the contribution, award, or payment is provided.
3. Commands utilizing this authority must maintain written records of each award presented to an employee for 3 years in accordance with reference (f).

**FOREIGN TRAINING REQUIREMENTS**

1. The use of foreign training instrumentalities for employees who are located within the United States requires consultation between the DON, DoD, and U.S. Department of State. Planning ahead for foreign training requests is imperative.
2. OCHR CWDD will work with DCPAS to facilitate the U.S. Department of State coordination to confirm that the foreign training facility is eligible to provide services. Eligibility must be determined before use of a foreign training facility and at least once every three years thereafter.
3. At least 120 days prior to scheduled departure, the Command training representative should submit a request package to CWDD. The package should include at a minimum:
  - a. A justification letter as to why foreign training is the only acceptable option, showing that the training, education, or professional development course is not available within the United States or that attendance at the foreign training is critical to the DON mission;
  - b. Completed SF-182; and
  - c. Detailed information about the training to be attended.
4. OCHR CWDD will verify that similar training is unavailable in the United States and if travel is permitted to the country specified.
5. OCHR CWDD will email the Command directing them to have the employee who is attending a foreign training, education, or professional development course submit a request through the Aircraft and Personnel Automated Clearance System (APACS) at <https://apacs.dtic.mil>.
6. OCHR CWDD will contact the appropriate U.S. Department of State contact listed in the Electronic Foreign Clearance Guide (FCG) <https://www.fcg.pentagon.mil/fcg.cfm> with a confirmation that the training is not available in the United States and will include all of the following information:

a. Country or countries to be visited. This should include a list of the country or countries the traveler will be visiting.

b. People Traveling. This should include their names, citizenship or nationality if non-US, grade, title, Command, and security clearance.

c. Dates of travel and itinerary. This should include flight information if available, specific locations to be visited in each country (city, province, state, or island), date and time arriving and departing each location, and alternate dates if the original dates cannot be accommodated.

d. Purpose of travel. This should be specific and include subjects to be discussed as well as the classification level and disclosure authority if briefing foreign nationals. Sufficient detail should be given to permit evaluation against prescribed criteria, including the field of interests and the scope of the material to be covered.

e. Organization(s) to be visited. This should include the name and address of organization(s) and/or individual(s) to be visited. The name, grade or title, and local phone number of the point of contact or person extending the invitation shall also be provided.

f. Support required and source of funding. This shall include any logistical and/or administrative support as well as funding sources as described below:

(1) Logistical and/or administrative support such as hotel accommodations, group and air transportation, drivers, required onward bookings, courier service or storage for classified material, security guards or forces, assistance in preparing or presenting briefings, and assistance in arranging meetings should be outlined if requested.

(2) Funding sources should be listed for services requiring payment. This should include how the requested services are to be paid (e.g., with program funds, official credit card, fund cite, etc.).

g. Statement(s). This should include if Special Area Clearance is or is not requested as well as the date of completion or expected date of completion of Antiterrorism/Force Protection training.

h. Theater-specific requirements. This should include the country name and any theater-specific requirements.

i. Country-specific requirement. This should include any country specific requirement.

j. Information for contacting travelers at their home station. This should include each traveler's name, grade or title, organization, commercial phone and fax numbers, Defense Switched Network phone and fax numbers, and email address.

k. If the travel clearance request is classified, include paragraph markings and downgrade instructions per Executive Order 12958. Mark any classified paragraph whose contents can be released to foreign nationals appropriately, i.e., with the marking "US and [name of specific country or countries] only."

l. If personal information is required, e.g., social security number, birthplace, etc., include the marking "Personal Data - Privacy Act of 1974."

7. The State Department will review the information submitted by OCHR CWDD and will locate the employee's paperwork in APACS.

8. OCHR CWDD will remind the employee of any special travel restrictions and any special mandatory training(s) for the region he/she is visiting as listed in the FCG.

9. The State Department will notify the employee of their ability to proceed with booking their travel.