

Schary, Claire

From: Bobby Cochran [cochran@willamettepartnership.org]
Sent: Wednesday, February 20, 2013 7:27 PM
To: Schary, Claire
Cc: Carrie Sanneman
Subject: Re: EPA's budget situation & invitational travel rules

Good news!

Bobby Cochran
Willamette Partnership
4640 Macadam Ave, Ste 50
Portland, OR
503-334-6872

On Feb 20, 2013, at 12:56 PM, "Schary, Claire" <Schary.Claire@epa.gov> wrote:

Well, it turns out you can pay my travel upfront! Who knew? I just talked to our travel ethics person at HQ and this will work even easier than the other way (and sorry I didn't suggest this first – I incorrectly assumed it would be more complicated). All it means is that we are accepting an in-kind gift of travel, and that is allowed for the type of meeting you want me to attend.

First, let's be clear that I explained to you that I won't be able to attend the meeting you are planning in Portland or wherever because of our travel budget situation. Because you want me at the meeting, you are offering to arrange my travel and cover the costs. Please explain that in the letter (paper or email) that invites me to the meeting. Also explain the purpose of the meeting and my role in it (or any other EPA person you want to have there in person). State clearly that you are not using any federal grant dollars or the money designated as matching funds for that grant, and that you have good accounting procedures in place to be able to document that (which is true).

Then, at least 15 days in advance of the meeting you can go ahead and book the hotel and transportation for me, pay for it, and mail me the tickets or confirmation information. I also need the amount of each thing you paid for in advance so that I can put it on an electronic ethics form that gets routed around (which is why I need 15 days advance notice) for approval before I am allowed to go on the trip. At the meeting you can pay for my meals and any other expenses, and we don't have to comply with per diems or anything. At the end of the trip I update the amounts spent, and that's it!

So go ahead and locate the meetings where it works best for you. I will also leave it up to you to decide if you want other EPA people at the meetings or not, or if phone participation will work as well.

-- Claire

From: Bobby Cochran [<mailto:cochran@willamettepartnership.org>]
Sent: Wednesday, February 20, 2013 11:43 AM
To: Schary, Claire
Cc: Carrie Sanneman
Subject: Re: EPA's budget situation & invitational travel rules

Thanks Claire,

Looks like we can't front you the money for expenses. Is that right?

On Wed, Feb 20, 2013 at 11:25 AM, Schary, Claire <Schary.Claire@epa.gov> wrote:
<image001.gif>

Bobby & Carrie,

Below are the rules I have to follow to accept reimbursement of my travel expenses from a non-federal party. However, what is more important right now is that our travel budget is so small, even EPA's up-front coverage of the costs I would incur will cause budget havoc – i.e., we don't have enough money allocated under the Continuing Resolution (CR) to cover hotel costs and/or per diems (even though I could drive a government car to Oregon for the meeting and that won't hurt our budget). (We aren't getting a full year's budget under a CR – we get small monthly amounts at a time). The reimbursement process can take months so it will put us as overdrawn for a while before a reimbursement shows up. No one seems to know what the sequestration cuts will do – but probably it will be even worse.

Therefore, the safest bet, until we have a longer or better budget allocation, is to have the April meeting in Seattle or within driving distance (e.g., near Olympia) so that EPA staff can come and go within 12 hours to avoid per diem. I have no idea if the situation will be better by time of the June meeting – but let's hope so!

FYI, here are the federal per diems and airfare costs:

Washington County (OR) per diem: meals & incidentals = \$51, hotel = \$93

Hood Canal (WA) area per diem: meals & incidentals = \$61, hotel = \$93

Boise per diem: meals & incidentals = \$46, hotel = \$77

Airfare Seattle to Boise: \$90 each way is cheapest government fare (but that fare is subject to availability); \$147 is not subject to availability.

Airfare Seattle to Portland: \$59 each way is cheapest government fare (but that fare is subject to availability); \$104 is not subject to availability.

Airfare Boise to Portland (for Bill Stewart): \$79 each way is cheapest government fare (but that fare is subject to availability); \$109 is not subject to availability.

EPA Booking & Voucher processing fee: \$5 – 29 depending on travel arrangements.

Invitational Travel rules:

1. You are invited to receive travel expenses (you can't solicit the payment).
2. You must get both regional and HQ ethics officers' approval of trip in advance of departing
3. If the travel will be reimbursed in cash, then you will need to complete a travel authorization in GovTrip (government travel authorization and voucher processing system). The trip will be forward-funded by your office.
4. Upon return from the trip, you must complete a voucher in GovTrip

Once the travel is completed, collect the approved form, invitation letter, any receipts, and a copy of the voucher and send it all to our Finance office in Cincinnati, noting that this is the back-up material for a third party bill. Be sure to include the billing address of the entity that is paying. Keep a copy for your reference.

Details:

- We must get approval from regional office ethics officer and EPA HQ's Office of General Council in advance of each trip. They prefer we start the process (filling out and submitting a form electronically) 15 days before the trip begins

-- The source of the funding for the travel cannot be federal grant money, and the purpose of the travel must be to attend a meeting, conference, seminar, speaking engagement, training course, or similar event

-- We cannot accept travel expenses to carry out statutory or regulatory EPA functions, such as investigations, inspections, site visits, negotiations or litigation.

-- We must provide details describing the entity, why they want us to participate in the proposed activity, and why your attendance supports *EPA's* mission. **This would be easiest if it was also explained in a letter or email inviting me to the meeting or conference.**

-- We must check to see if the proposed airfare, hotel costs, etc., fall within the cited Federal travel limitations.

-- We cannot claim per diem for a meal already covered by the meeting arrangements so any free meals will need to be noted on the voucher and then deducted from the allowable per diem amount.

Hope this information is helpful, despite appearing so bureaucratic!

-- Claire

Claire Schary

Water Quality Trading Coordinator

Watershed Unit / Office of Water & Watersheds

schary.claire@epa.gov / (206) 553-8514

USEPA Region 10 / 1200 Sixth Ave, Suite 900 (OWW-135), Seattle, WA 98101