

GSA ORDER

SUBJECT: GSA Non-Federal Source (NFS) Travel Policy

1. Purpose. This directive describes GSA internal policy and guidance for acceptance of payment for travel, subsistence, and related expenses from a Non-Federal Source (NFS) by GSA for employees on GSA's behalf to attend meetings and similar functions, relating to the official duties of the employee, while in an official travel status.

2. Scope and Applicability.

a. This directive applies to all GSA organizations, programs, and personnel, including all Services, Staff Offices, and Regions. This Order applies to the Office of the Inspector General (OIG) to the extent that the OIG determines it is consistent with the OIG's independent authority under the Inspector General Act and does not conflict with other OIG policies or the OIG mission. This Order applies to the Civilian Board of Contract Appeals (CBCA) to the extent that the CBCA determines it is consistent with the CBCA's independent authority under the Contract Disputes Act and applicable Federal Court decisions and does not conflict with other CBCA policies or its mission.

b. 31 U.S.C. § 1353, implemented in the Federal Travel Regulation (FTR) in Chapter 304 (41 CFR Chapter 304), is the exclusive authority under which GSA may accept payment for travel expenses from a NFS for its employees to attend a meeting, conference, or similar function outside of their official station. This directive supplements FTR Chapter 304. An NFS payment is considered a gift to the agency and not to the employee. Travel that is required to carry out GSA's statutory and regulatory functions (e.g., investigations, inspections, audits, site visits) is specifically excluded. Supervisors, approval authorities and employees must still consult FTR Chapter 304 to ensure complete compliance with the regulations related to NFS benefits not specifically addressed in this directive.

3. Cancellation. This Order cancels and supersedes OAS 5765.1 GSA Non-Federal Source (NFS) Travel Policy.

4. Responsibilities.

a. The Office of Travel and Charge Card Services, Office of Administrative Services

(OAS) is responsible for developing travel policy, to include acceptance of travel payments from a NFS, for GSA employees and for individuals authorized to travel at GSA's expense. The Office of Travel and Charge Card Services issues this Policy and Procedure directive.

5. Revisions.

a. All references to "Travel Policy & Charge Card Program Division" have been changed to "Office of Travel and Charge Card Services".

b. All references to "offeror letter" and "offer letter" have been changed to "invitation".

c. Paragraph 1.b. is revised to clarify the process for approval of NFS offers of payment through submission of an Event Tracker attendee request and to require that a request to accept NFS travel expenses be submitted in Event Tracker at least 30 business days before a scheduled trip.

d. Paragraph 1.c. is revised to remove the requirement for a signed memorandum from the employee's supervisor and add the requirement for submission of a Non-Federal Source Funding Request Acceptance Worksheet when requesting approval of a NFS offer of payment.

e. Paragraph 2.b. is revised to clarify the requirement to submit an authorization upon approval of a NFS offer of payment and allow travel advances in accordance with OAS 5735.1, Travel Advances.

f. Paragraph 2.d. is revised to provide additional guidance on requesting a waiver of the in kind payment and accepting reimbursement by check.

g. Appendixes B and C are removed.

6. Signature.

/S/ _____
BOB STAFFORD
Chief Administrative Services Officer
Office of Administrative Services

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GSA NON-FEDERAL SOURCE (NFS) TRAVEL POLICY

1. Policy.

a. Acceptance of Travel Reimbursements from a Non-Federal Source (NFS). If the employee is attending a conference/event outside their official station, GSA may accept payment from a NFS for travel-related expenses only when the acceptance of payment has been approved by the Chief Administrative Services Officer and the General Counsel in advance of the scheduled travel.

(1) Payments accepted under the authority 31 U.S.C. §1353, implemented in the FTR in [Chapter 304](#) (41 CFR Chapter 304), will only occur if the travel is in the interest of the Government and the travel relates to the employee's official duties.

(2) Only in kind payments will be accepted. A waiver may be granted by the Office of Administrative Services (OAS) on a case-by-case basis. The process for granting a waiver is prescribed by paragraph 2.d. below.

(3) Payments will not be accepted from a NFS doing or seeking to do business with GSA, seeking official action from GSA or has interests that may be substantially affected by the performance or nonperformance of the employee's duties. Approving officials must be guided by this directive and all relevant considerations described in [FTR §304-5.3](#).

b. Advance Approval of a Request Prior to Acceptance of NFS Travel Expenses. Employees must upload and submit the documents described below in paragraph 1.c. as attachments to the request through Event Tracker, GSA's conference attendance and event management application. Attendee requests that include a request to accept NFS travel expenses must be submitted in Event Tracker at least 30 business days before a scheduled trip for approval. Attendee requests that indicate NFS offers of payment are automatically routed to OAS and OGC. As a part of the advance approval process:

(1) OAS will ensure that all travel expenses are consistent with travel regulations and internal policy, and

(2) OGC will ensure that acceptance of the NFS payment will not pose a conflict of interest and that GSA can legally accept the NFS payment as described in [FTR §304-5.3](#).

c. Travel Package. The travel package attached in the Event Tracker request must include:

(1) A written invitation from the NFS. A sample invitation is provided in [Appendix A](#). This invitation does not need to be a formal letter or memorandum. The written invitation is acceptable so long as it contains the following:

- (a) The name, email address and telephone number of the NFS (person or entity) offering to pay for the trip;
 - (b) The name of the event;
 - (c) The date of the event;
 - (d) The location of the event;
 - (e) The name of the GSA employee who is invited to attend the event;
 - (f) A description of what the NFS entity offered to pay for (lodging, meals, airfare, registration fee, etc.) broken down by each day and the actual cost of each item;
- (2) A completed Non-Federal Source Funding Request Acceptance Worksheet. The [worksheet](#) must be attached to the attendee request in Event Tracker; and
- (3) A copy of the agenda from the NFS for the conference or similar event.

2. Procedures.

a. Once OAS completes the review of the attendee request and approves it in Event Tracker, the request is then forwarded to OGC for its final review and determination as to whether the NFS travel expense(s) can be legally accepted. When OGC completes its final review, OGC will complete the final approval of the attendee request in Event Tracker.

b. The employee will complete a travel authorization using the E-Gov Travel Service 2 (ETS2) prior to any travel if there are expected travel expenses. The employee will complete a GSA Form 87 prior to travel if there are no expected travel expenses. Travel authorizations will not be completed by employees attending events at their official station or participating in virtual events. The travel authorization must indicate:

(1) Travel expenses that are being paid for in kind by the NFS (e.g., lodging, meals, airfare, ground transportation, registration fee), and how much each is expected to cost. Expenses paid in kind by the NFS will be listed in the Comments section of the Concur authorization or the Remarks/Justification section of the Form 87, as appropriate.

(2) Allowances that GSA is funding and the maximum daily rates authorized (e.g., meals and incidental expenses, lodging, airfare, ground transportation, registration fee). Only those costs that are expected to be reimbursed by GSA are reflected in the estimated cost to the Government in the Non-Federal Source Funding Request Acceptance worksheet and included as expenses in the authorization.

(3) Travel advances. Travel advances are only authorized in accordance with [OAS 5735.1, Travel Advances](#), and will be processed as outlined in the policy.

(4) Justification and authorization of other than coach-class accommodations on the travel authorization and voucher. When the ticket is provided in kind by a NFS, employees must still meet the criteria outlined in [FTR §304-5.5](#). Payment in full by a NFS is a justification for flying business class, per [FTR §301-10.123\(b\)\(5\)](#).

c. Approval of Travel Authorization. Once the steps a. and b. above are completed, the employee submits the NFS travel authorization to his/her authorizing official for approval. The appropriate authorization must be approved prior to travel.

d. Approval of a Waiver. Heads of Services and Staff Offices or Regional Administrators shall submit a waiver request and justification to OAS for approval to accept payment by check by a NFS. Waivers will only be considered if the NFS has no ability to pay for the offered benefits in kind. The request and justification can be in the form of an email to the Chief Administrative Services Officer via the Office of Travel and Charge Card Services. The request should specifically ask for a waiver to accept a check for reimbursement to GSA for travel expenses related to the NFS travel request. Non-Federal Sources are not eligible to utilize city-pair airfares and employees cannot obtain city-pair airfare and then be reimbursed by the NFS. The email should provide the details of the trip.

(1) Reimbursement Check. When a waiver to the in kind requirement is granted, the employee should provide his/her travel authorization number to the NFS; inform the NFS to include that authorization number on the check (payable to GSA); and send the check to the Federal Shared Service Provider (FSSP) at:

USDA-OCFO, Financial Information & Operations Division
Financial Operations & Disbursement Branch
Attn: GSA Travel Section, 2SE
2300 Main Street
Kansas City, MO 64108

e. Vouchering.

(1) The employee must only voucher for those travel expenses that are to be reimbursed by GSA as authorized on the travel authorization.

(2) If additional payments in kind are made by the NFS which were not included in the original invitation or the statement from the NFS that it will pay the expenses listed in paragraph 1.c.(1)(f) above, then within 7 working days after the employee's trip ends, the employee must request OGC's authorization to accept the additional payment(s). Employees must forward a revised invitation and Non-Federal Source Funding Request Acceptance worksheet to OGC for review. OGC will determine whether the additional payment(s) can be accepted by the agency in accordance with

[FTR §304-3.13](#). Once OGC makes a determination, the employee must attach a copy of the revised documentation to the previously approved attendee request in the Event Tracker application.

(3) Travel vouchers must be submitted to the employee's authorizing official for approval through ETS2 within 5 business days after completion of travel.

(4) Travel reimbursements made by GSA are generally paid within 3 business days after final approval.

f. Reporting. OGC, in coordination with OAS, shall be responsible for submitting the Semi-Annual Report of Payments Accepted from a NFS to the Office of Government Ethics, in accordance with [FTR §§304-6.4 and 304-6.5](#). The Office of Travel and Charge Card Services will forward copies of the travel vouchers and other required documents to OGC to facilitate the preparation of the semi-annual reports.

3. Limitations/Restrictions.

a. Travel that is required to carry out GSA's statutory and regulatory functions (e.g., investigations, inspections, audits, site visits) is specifically excluded from this process as these functions do not meet the requirements of [FTR §304-3.4](#).

b. An employee may accept payment from more than one NFS for a single trip, so long as the total of such payments does not exceed the total cost of the trip.

c. Payment (as defined in [FTR §304-2.1](#)) by check or similar instrument to GSA from a NFS for travel expenses is prohibited, except when a waiver to in kind payment requirement is granted.

APPENDIX A

Sample Invitation

XYZ LETTERHEAD

ABC Publications
1234 Main Street
Atlanta, GA xxxxx

Mr. John Q. Employee:
1800 F Street, Ste xxx
Washington, DC 20405

Dear Mike:

On behalf of ABC Publications, we are pleased that you will be able to participate in this year's ABC Publications Annual Contract Course on October 23 and 24, XXXX, at the Fulton County Conference Center in Atlanta, GA, as the keynote speaker on October 23, XXXX.

As you would be speaking at the event, we would like to offer to pay the following expenses in kind:

Round-trip airfare from Washington, DC, to Atlanta - \$250
Ground transportation to and from the Atlanta Airport - \$50
Registration fee - \$750

If you have any questions, please call Ms. Joanna George at (xxx) xxx-xxxx.

Sincerely,

//signed

Michelle Review
Executive Director, ABC Publications