

# OGE SUMMIT 2014



**WIDELY ATTENDED GATHERING EXCEPTION  
PANEL DISCUSSION**

# Panel Participants



- Ms. Rebecca Hermanowicz, Attorney-Adviser, Department of Commerce
- Ms. Hannah Lobel, Attorney-Adviser, Department of State
- Ms. Tina Hymer, ADAEO, Department of Energy
- Mr. Ed McDonnell, ADAEO, Department of Interior
- Ms. Elizabeth Fischmann, ADAEO, Department of Health and Human Services
- Mr. Jeff Green, Senior Attorney, Department of Defense

# Topics



- **Elements**
- **Process**
- **Special Cases: Sports and Entertainment Events**
- **Valuation/Cost**
- **WAG Alternatives**
- **Wolves in WAGs' Clothing**
- **War Stories**

# WAG Elements



# Process



### Invitations Information Checklist\*

Please attach a copy of your invitation, or request and provide us with the following information:

1. Name of event:
2. Date of event:
3. Location of event:
4. Approximate number of attendees:
5. Describe the categories of anticipated attendees (industry, government, academics?):
  
6. Who is holding/organizing the event:
7. Name of the source of the invitation (if other than the event organizer):
8. Name of the individual extending the invitation, if other than the event organizer:
9. Name of the point of contact for the event, the contact's telephone number and email address (in case we have follow-on questions):
  
10. Is the organization extending the invitation a federally registered lobbying organization?
11. If you answered yes to question 10, is the organization extending the invitation a 501(c)(3) tax exempt organization under the federal Internal Revenue Code, or a media organization?
12. Is the individual extending the invitation a federally registered lobbyist?
13. Are you inviting the federal employee to participate as a speaker, panel member, or otherwise present information at the event, or just to attend? If yes, please describe.
  
14. Is the event a charitable fundraiser?
15. What is the ticket price or registration fee for this event, if any?
16. If there is no ticket price or registration fee, what is the fair market value for attendance at the event (or the per person cost to the event organizer)?
17. Is a spouse or other guest invited?
18. If you answered yes to question 17, how many additional guests were invited?
19. If you answered yes to question 17, will others in attendance generally be accompanied by a spouse or other guest? Ethics regulations provide that an employee may only accept *one* additional offer of free attendance to a widely attended gathering only when others in attendance will generally be accompanied by a spouse or other guest.
20. Will attendance at this event require travel?

\* Please note that this Checklist is not intended for use in reviewing invitations to political events.

April 23, 2013

DETERMINATION FOR \_\_\_\_\_ TO ACCEPT  
AN INVITATION FROM THE \_\_\_\_\_

Pursuant to 5 C.F.R. ' 2635.204(g), as the agency designee I hereby determine that the Department's interest in \_\_\_\_\_'s attendance at the \_\_\_\_\_ sponsored by \_\_\_\_\_ on \_\_\_\_\_, outweighs concern that acceptance of the gift of free attendance may or may appear to improperly influence him/her in the performance of his/her official duties. Relevant factors that I considered included:

(1) The importance of having Department employees present at this annual awards event {explain why it is important};

(2) To my knowledge the following matters concerning the \_\_\_\_\_ are currently pending at the Department: {describe nature and sensitivity of the matters};

(3) {Describe employee's involvement in matter concerning (the sponsor)\_\_\_\_\_};

(4) The other attendees at the event will include representatives from (name the groups or affiliations of the invitees); and

(5) The cost of the gift of free attendance, specifically \$\_\_\_ per person.

\_\_\_\_\_  
Supervisor

\_\_\_\_\_  
Date

\_\_\_\_\_  
GC-77 Concurrence

- 1. Date of the event:**
- 2. Sponsors (to include co-sponsors, if any):**
- 3. Per person cost of food and refreshments (estimated):**
- 4. Place and time of event:**
- 5. Characterization of event - for example, is it a reception or a dinner?**
- 6. What is the purpose of the event?**
- 7. Approximately how many people in total will be invited?**
- 8. What types of people have been invited? (Examples might be: Congressmen and staffers, state and local officials, academia, industry representatives, members of the public, media, other contractors, etc).**
- 9. Will there be gift items handed out? If so, please provide description and value.**
- 10. Is there a fundraising aspect to the event? If so, please describe the fundraising portions of the event.**
- 11. Please indicate if your organization employees lobbyists or engages in lobbying activities.**
- 12. Please indicate if your organization is a 501(c)(3) non-profit.**
- 13. Is there an invitation and/or website that has more information about the event? If so, please provide.**

**Thank you for your assistance. Please feel free to contact me if you have any questions.**



## INVITATION QUESTIONNAIRE

Please complete the questions below when requesting ethics review of an invitation.

Invited Employee(s): \_\_\_\_\_

Invited Employee's Title and Office: \_\_\_\_\_

Is the Invited Employee a Political Appointee?: ☐ Yes ☐ No

Event: \_\_\_\_\_

Date of Event: \_\_\_\_\_

Host of Event: \_\_\_\_\_

Is the Host Organization (or the Inviter, if Not the Host) a Lobbying Organization?:\*  
☐ Yes ☐ No

Person Who Sent the Invitation: \_\_\_\_\_

Is the Person Who Sent the Invitation a Lobbyist?\* ☐ Yes ☐ No

Cost of Ticket (or Per Person Catering Cost if Tickets Not Sold):\*\* \$ \_\_\_\_\_

Approximate Number of Guests Expected at the Event:\*\* \_\_\_\_\_

Approximate Number of U.S. Government Employees (including members of Congress and their staff) Expected at the Event:\*\* \_\_\_\_\_

Brief Description of Non-Federal Attendees (e.g., industry representatives, trade association members, think tanks, academia, media, foreign government officials:\*\*)

---

\* To search for lobbyist information, please search the Lobbying Disclosure Act Databases for both the U.S. House of Representatives and the Senate

House: <http://disclosures.house.gov/ld/ldsearch.aspx>

Senate: <http://soprweb.senate.gov/index.cfm?event=selectfields>

\*\* To obtain this information, you may need to contact the event organizer.

Submit the questionnaire to [ethicsdivision@doc.gov](mailto:ethicsdivision@doc.gov) or by calling 202-482-5384.

*Prepared by the Ethics Law and Programs Division, Office of the Assistant General Counsel for Administration, U.S. Department of Commerce – January 3, 2012*

**APPROVAL FORM FOR INVITATIONS TO A WIDELY-ATTENDED GATHERINGS  
TO BE ISSUED BY THE SUPERVISOR OF THE INVITED EMPLOYEE**

Invited Employee: \_\_\_\_\_

Event: \_\_\_\_\_

Host of Event: \_\_\_\_\_

Issuer of Invitation (if not the host): \_\_\_\_\_

Purpose for Employee Attending: \_\_\_\_\_

Applicable Law: A Department ethics official has determined that this event is a "widely-attended gathering" as that term is used in ethics regulations regarding personal gifts to employees and that, for invitations to political appointees, the invitation is not from a lobbyist or lobbying organization that is not a 501(c)(3) organization or media company. The next step is for the employee to obtain approval from the employee's supervisor based on a determination that: "the agency's interest in the employee's participation in the event outweighs the concern that acceptance of the gift of free attendance may or may appear to improperly influence the employee in the performance of his or her official duties." Close scrutiny is particularly required for events that may be perceived as elaborate or predominantly social in nature.

Certification of Agency Interest and Determination by Employee's Supervisor: In deciding whether approval is warranted, I, as the employee's supervisor, have determined that each of the following is true:

- an important agency interest is served by an employee's attendance at the event;
- this particular employee's attendance serves an agency interest in light of the employee's position and duties;
- other employees from the same office will not be attending or, even if other employees are attending, this employee's attendance is necessary for the agency;
- the event is not lavish or otherwise of a nature to create an appearance of undue benefit to the employee or impropriety based on the nature of the event;
- persons attending from outside the U.S. Government are persons with whom the employee may have a useful exchange of ideas relating to the agency activities; and
- the persons attending from outside the U.S. Government will be in sufficient numbers to permit an opportunity for the employee to meet and have an exchange of ideas.

- ☐ **I Approve the Employee's Acceptance of the Invitation Because the Agency's Interest Outweighs Any Appearance of Improper Influence on the Employee**
  - ☐ employee is required to take annual leave (or leave without pay)
  - ☐ employee is granted an excused absence or authorized to attend without use of leave
  - ☐ event takes place outside duty hours so leave or excused absence is not required
- ☐ **I Disapprove the Employee's Acceptance of the Invitation**

Supervisor's Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**FREE ATTENDANCE AT WIDELY ATTENDED GATHERING (WAG)  
OR SPEAKING ENGAGEMENT**

**-- ATTACH COPY OF EVENT AGENDA AND COPY OF INVITATION**

Employee completes this block and questions 1a through 10. After review, employee retains the original form; supervisor and ethics official retain a copy.

EMPLOYEE'S NAME (please print)	TELEPHONE NUMBER
TITLE/POSITION	E-MAIL ADDRESS
ARE YOU A POLITICAL APPOINTEE (e.g., PAS, Non-Career SES, Schedule C)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
BUREAU/OFFICE	
NAME OF EVENT	DATE OF EVENT
LOCATION OF EVENT (City/State)	TIME OF EVENT
NAME OF EVENT SPONSOR	IS SPONSOR A 501(c)3 ORGANIZATION OR A MEDIA ORGANIZATION? <input type="checkbox"/> Yes <input type="checkbox"/> No

1a. What is the purpose of the event?

1b. Is the event a fundraiser?

☐ Yes ☐ No

2a. Did someone other than the sponsor invite you or ask the sponsor to invite you?

☐ Yes ☐ No

• If Yes, who?

2b. Will someone other than the sponsor pay the cost of your attendance?

☐ Yes ☐ No

• If Yes, who?

• Is this a 501(c)3 organization or a media organization?

☐ Yes ☐ No

3a. Will you be on official duty to participate as a speaker, panel member, or otherwise to formally present information on behalf of the Department of the Interior?

☐ Yes ☐ No

3b. If you answered Yes to 3a and it's a multi-day event, have you been offered free attendance on the day(s) on which you are not scheduled to participate as a speaker, panel member, etc.?

☐ Yes ☐ No

3c. If you answered Yes to 3b, would you like to accept the offer of free attendance for the day(s) on which you are not scheduled to participate as a speaker, panel member, etc.?

☐ Yes ☐ No

4. How will your attendance at this event further agency programs and operations?

5a. What other types of people are expected to attend? (For example, members from throughout a given industry; other Federal, state, or local government officials; etc.)

5b. Will the attendees represent a range of persons interested in a given matter?

☐ Yes ☐ No

• If Yes, what matter?

5c. Approximately how many people are expected to attend? \_\_\_\_\_

6. What is the monetary value of the gift of free attendance (conference fee and/or food, refreshments, entertainment, instruction, and materials furnished to all attendees as an integral part of the event) and how was this cost determined? (Attach separate sheet, if necessary.)

<p>7. Does the person who extended the invitation (i.e., who is paying the costs for your attendance) have interests that may be substantially affected by the performance or nonperformance of your official duties? If the invitation is from an organization, does the majority of its members have such interests? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>• If Yes:</p> <ul style="list-style-type: none"> <li>Describe the nature and sensitivity of any pending matter affecting the interests of the person who extended the invitation.</li> <li>What is the significance of your role in the matter?</li> <li>What is the importance of the event to the agency?</li> </ul>	
<p>8. Does the invitation include attendance by your spouse or other guest? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <ul style="list-style-type: none"> <li>If yes, will other attendees at the event generally be accompanied by their spouse or other guest? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>Would you like to accept the offer of free attendance for your spouse or other guest to attend? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ul>	
<p>9a. Will the event be after duty hours, e.g., evening, weekend? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>9b. If during duty hours, will you be on leave or excused absence? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p>	
<p>10. Are you required to file a financial disclosure report (OGE Form 450 or SF 278)? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p>	
EMPLOYEE SIGNATURE	DATE

<p><b>ETHICS OFFICIAL REVIEW</b></p> <p>NAME</p>	
<p>– This request meets the ethics requirements for acceptance of free attendance at the event by the employee, subject to supervisor's approval. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>– This request meets the ethics requirements for acceptance of free attendance at the event by the employee's spouse or other guest, subject to supervisor's approval. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p><b>Comments</b> (For example, note whether the lobbyist gift ban applies, whether the gift must be reported on a financial disclosure report, etc.):</p>	
ETHICS OFFICIAL SIGNATURE	DATE

<p><b>SUPERVISOR REVIEW</b></p> <p>NAME</p>	
<p><input type="checkbox"/> I approve. Attendance is in the interest of the agency because it will further agency programs and operations. If the answer to question 7 is Yes, I have found that the agency's interest in the employee's participation in the event outweighs the concern that acceptance of the gift of free attendance may or may appear to improperly influence the employee in the performance of his or her official duties after considering the importance of the event to the agency; the nature and sensitivity of any pending matter affecting the interests of the person who extended the invitation; the significance of the employee's role in the matter; the purpose of the event; the identity of other expected participants; and the market value of the gift of free attendance.</p> <p><input type="checkbox"/> I disapprove.</p> <p style="text-align: center;"><b><u>RETURN A COMPLETED COPY TO YOUR ETHICS OFFICIAL.</u></b> <b><u>KEEP THE ORIGINAL FOR EMPLOYEE RECORDS.</u></b></p>	
SUPERVISOR SIGNATURE	DATE

If approved, you may accept waiver of all or part of a conference or other fee and/or the provision of food, refreshments, entertainment, instruction, and materials furnished to all attendees as an integral part of the event. You may not accept travel expenses, lodgings, entertainment collateral to the event, or meals taken other than in a group setting with all other attendees.

Privacy Act Statement: The information obtained from this form will be used to determine whether the filer is in compliance with the Executive Branch gift acceptance regulations governing free attendance at widely attended gatherings or speaking engagements (5 CFR 2635.204(g)). The general authority for collecting this information is contained in 5 CFR 2635.204(g)(3).

## **11 FAM 617 USE OF WIDELY ATTENDED GATHERING GIFTS EXCEPTION**

### **11 FAM 617.1 Background**

*(CT:POL-53; 09-20-2012)*

Unless an exclusion or exception applies, an employee is prohibited by the gift rules in [5 CFR 2635.101b](#) from accepting a gift from a prohibited source or that is given because of official position. The "widely attended gathering" exception at [5 CFR 2635.204\(g\)\(2\)](#) permits an employee to accept "free attendance" (see [11 FAM 611.3](#), Definitions) at certain events, but use of the exception requires advance approval.

### **11 FAM 617.2 Responsibilities**

*(CT:POL-53; 09-20-2012)*

- a. The officials authorized to approve acceptance by an employee of an unsolicited gift of "free attendance" at an event are:
  - (1) For employees serving in a bureau:
    - (a) The bureau head;
    - (b) A deputy bureau head; or
    - (c) The management official; and
  - (2) For employees serving at a post:
    - (a) The ambassador/principal officer;
    - (b) The deputy chief of mission; or
    - (c) The management official.
- b. The bureau head or ambassador/principal officer may further limit who may ordinarily exercise this authority. An individual may not approve acceptance of his or her own free attendance.

### **11 FAM 617.3 Requirements**

*(CT:POL-53; 09-20-2012)*

- a. Subject to the additional conditions covered in [11 FAM 617.3](#), paragraphs b and c, an employee may accept an unsolicited gift of free attendance if the approving official determines that:
  - (1) A large number of persons will attend the event (ordinarily more than 20); persons with a diversity of views or interests will be present; and the event is of mutual interest to a number of parties;
  - (2) The cost of attendance is borne by the sponsor of the event (i.e., the person or organization hosting the event) or, if the cost is borne by other than the sponsor of the event, more than 100 persons are expected to attend the event, and the gift has a market value of \$350 or less (this amount was established in 2011 and changes periodically; consult the Ethics Office as to the current value);
  - (3) The employee will attend the event on personal time or will be authorized to attend on excused absence or otherwise without charge to the employee's leave account; and
  - (4) The employee's attendance is in the interest of the Department because it will further Department programs or operations.
- b. If the offered gift extends to free attendance for a guest of the invited employee, the approving official must also determine that:
  - (1) Others in attendance will generally be accompanied by a spouse or other guest;
  - (2) The offer is from the same person or entity that is bearing the cost of the employee's attendance; and
  - (3) If the offer is from a nonsponsor, the aggregate market value of free attendance for the employee and the guest will not exceed \$350 (consult the Ethics Office for the current designated amount).
- c. If the offered gift is from a person or entity that may be substantially affected by the performance or nonperformance of the invited employee's official duties (or from an organization a majority of whose members are affected by those duties), the approving official must also determine, in writing, that the Department's interest in the employee's participation in the event outweighs concern that acceptance of the gift of free attendance may or may appear to influence improperly the employee in the performance of his or her official duties. Relevant factors that should be considered by the approving official in making this determination include:

- (1) The importance of the event to the Department;
  - (2) The nature and sensitivity of any pending matter affecting the interests of the person who has extended the invitation;
  - (3) The significance of the employee's role in any such matter;
  - (4) The purpose of the event;
  - (5) The identity of other expected participants; and
  - (6) The market value of the gift of free attendance.
- d. The approving official may consult or request guidance from the Ethics Office if necessary.

**11 FAM 617.4 Additional Information on Web Site About Widely Attended Gatherings**

*(CT:POL-53; 09-20-2012)*

For additional information, go to the ethics program Web site and select "Gifts," or "Bureau/Post Responsibilities."



# Special Cases: Sports and Entertainment Events as Widely Attended Gatherings?



## **RELEVANT LEGAL ADVISORIES**

- **OGE INFORMAL ADVISORY MEMORANDUM 87X13**
- **OGE INFORMAL ADVISORY LETTER 99X2**
- **OGE MEMORANDUM DO-07-003,  
VALUATION OF GIFTS OF ADMISSION TO AN  
EVENT IN A SKYBOX OR PRIVATE SUITE**
- **OGE MEMORANDUM DO-07-047, WIDELY  
ATTENDED GATHERINGS**
- **OGE MEMORANDUM DO-09-030, THE KENNEDY  
CENTER FOR THE PERFORMING ARTS**



# Factors to Consider



- Who has been invited?
- How will the sporting or theater event further agency operations?
- How structured is the event?
- Is there an interchange of ideas with a variety of officials?

# Valuation / Cost



# WAG Alternatives



# Wolves in WAGs' Clothing



# Who Is the Sponsor?



- Scrutinize invitation **closely**
- Who invited your employee?
- Host or contributing sponsors
- Beware of “Wolves in WAGs’ Clothing” (and other pitfalls)

# Example One



*Young Elected Officials  
Network*

*Cordially invites you to  
attend*

*its Annual Convening on May  
15-18, 2014*



2014 YEO NATIONAL  
CONVENING

Special Thanks to our  
Convening Sponsors



OPEN SOCIETY  
FOUNDATIONS

THE NATHAN  
CUMMINGS  
FOUNDATION

FORD FOUNDATION

THE NEW WORLD  
FOUNDATION



SEIU

Laurie and Bill Benenson



NARAL  
Pro-Choice America



[WWW.YEONETWORK.ORG](http://WWW.YEONETWORK.ORG)



YOUNG ELECTED OFFICIALS  
NETWORK

# Example 2



***Emily's List  
Houston Regional Reception  
October 1, 2014  
Join Emily's List President  
and special guests...***

**Ticket Levels:**

**Host: \$5000 – 6 tickets to VIP panel and 6 tickets to the reception...**

**Sponsor: \$1000 – 2 tickets to VIP panel and 2 tickets to the reception**

**Guest: \$250 – 1 ticket to the reception**



# Likely Wolves Not WAGs



- Investment company invitations
- Board of Directors meetings
- Partisan political events



# Friends or Family?



- **Spouse or One-Guest Rule**
  - Offered, not solicited
  - Others in attendance generally accompanied by spouse or a guest
  - Spouse or guest invite from same source
  - Add market value of both tickets
  - Reporting on OGE 278 or 450

# War Stories



# FREE ATTENDANCE AT WIDELY ATTENDED GATHERING (WAG) OR SPEAKING ENGAGEMENT

## -- ATTACH COPY OF EVENT AGENDA AND COPY OF INVITATION

Employee completes this block and questions 1a through 10. After review, employee retains the original form; supervisor and ethics official retain a copy.

EMPLOYEE'S NAME (please print)	TELEPHONE NUMBER
TITLE/POSITION	E-MAIL ADDRESS
ARE YOU A POLITICAL APPOINTEE (e.g., PAS, Non-Career SES, Schedule C)? <input type="checkbox"/> Yes <input type="checkbox"/> No	
BUREAU/OFFICE	
NAME OF EVENT	DATE OF EVENT
LOCATION OF EVENT (City/State)	TIME OF EVENT
NAME OF EVENT SPONSOR	IS SPONSOR A 501(c)3 ORGANIZATION OR A MEDIA ORGANIZATION? <input type="checkbox"/> Yes <input type="checkbox"/> No

1a. What is the purpose of the event?	
1b. Is the event a fundraiser? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
2a. Did someone other than the sponsor invite you or ask the sponsor to invite you? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
• If Yes, who?	
2b. Will someone other than the sponsor pay the cost of your attendance? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
• If Yes, who?	
• Is this a 501(c)3 organization or a media organization? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
3a. Will you be on official duty to participate as a speaker, panel member, or otherwise to formally present information on behalf of the Department of the Interior? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
3b. If you answered Yes to 3a and it's a multi-day event, have you been offered free attendance on the day(s) on which you are not scheduled to participate as a speaker, panel member, etc.? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
3c. If you answered Yes to 3b, would you like to accept the offer of free attendance for the day(s) on which you are not scheduled to participate as a speaker, panel member, etc.? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
4. How will your attendance at this event further agency programs and operations?	
5a. What other types of people are expected to attend? (For example, members from throughout a given industry; other Federal, state, or local government officials; etc.)	
5b. Will the attendees represent a range of persons interested in a given matter? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span>	
• If Yes, what matter?	
5c. Approximately how many people are expected to attend? _____	
6. What is the monetary value of the gift of free attendance (conference fee and/or food, refreshments, entertainment, instruction, and materials furnished to all attendees as an integral part of the event) and how was this cost determined? (Attach separate sheet, if necessary.)	

<p>7. Does the person who extended the invitation (i.e., who is paying the costs for your attendance) have interests that may be substantially affected by the performance or nonperformance of your official duties? If the invitation is from an organization, does the majority of its members have such interests? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <ul style="list-style-type: none"> <li>• If Yes:           <ul style="list-style-type: none"> <li>• Describe the nature and sensitivity of any pending matter affecting the interests of the person who extended the invitation.</li> <li>• What is the significance of your role in the matter?</li> <li>• What is the importance of the event to the agency?</li> </ul> </li> </ul>	
<p>8. Does the invitation include attendance by your spouse or other guest? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <ul style="list-style-type: none"> <li>• If yes, will other attendees at the event generally be accompanied by their spouse or other guest? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> <li>• Would you like to accept the offer of free attendance for your spouse or other guest to attend? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></li> </ul>	
<p>9a. Will the event be after duty hours, e.g., evening, weekend? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>9b. If during duty hours, will you be on leave or excused absence? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p>	
<p>10. Are you required to file a financial disclosure report (OGE Form 450 or SF 278)? <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p>	
EMPLOYEE SIGNATURE	DATE

<p><b>ETHICS OFFICIAL REVIEW</b></p> <p>NAME</p>	
<p>-- This request meets the ethics requirements for acceptance of free attendance at the event by the employee, subject to supervisor's approval. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p>-- This request meets the ethics requirements for acceptance of free attendance at the event by the employee's spouse or other guest, subject to supervisor's approval. <span style="float: right;"><input type="checkbox"/> Yes <input type="checkbox"/> No</span></p> <p><b>Comments</b> <i>(For example, note whether the lobbyist gift ban applies, whether the gift must be reported on a financial disclosure report, etc.):</i></p>	
ETHICS OFFICIAL SIGNATURE	DATE

<p><b>SUPERVISOR REVIEW</b></p> <p>NAME</p>	
<p><input type="checkbox"/> I approve. Attendance is in the interest of the agency because it will further agency programs and operations. If the answer to question 7 is Yes, I have found that the agency's interest in the employee's participation in the event outweighs the concern that acceptance of the gift of free attendance may or may appear to improperly influence the employee in the performance of his or her official duties after considering the importance of the event to the agency; the nature and sensitivity of any pending matter affecting the interests of the person who extended the invitation; the significance of the employee's role in the matter; the purpose of the event; the identity of other expected participants; and the market value of the gift of free attendance.</p> <p><input type="checkbox"/> I disapprove.</p> <p style="text-align: center;"><b><u>RETURN A COMPLETED COPY TO YOUR ETHICS OFFICIAL.</u></b> <b><u>KEEP THE ORIGINAL FOR EMPLOYEE RECORDS.</u></b></p>	
SUPERVISOR SIGNATURE	DATE

If approved, you may accept waiver of all or part of a conference or other fee and/or the provision of food, refreshments, entertainment, instruction, and materials furnished to all attendees as an integral part of the event. You may not accept travel expenses, lodgings, entertainment collateral to the event, or meals taken other than in a group setting with all other attendees.

Privacy Act Statement. The information obtained from this form will be used to determine whether the filer is in compliance with the Executive Branch gift acceptance regulations governing free attendance at widely attended gatherings or speaking engagements (5 CFR 2635.204(g)). The general authority for collecting this information is contained in 5 CFR 2635.204(g)(3).