



The Comptroller General  
of the United States

Washington, D.C. 20548

## Decision

Matter of: Army Corps of Engineers - Toastmasters International Membership Fees as Training Expenses

File: B-223447

Date: October 10, 1986

### DIGEST

Upon a determination that a need for public speaking training exists among its employees, and that this need can most efficiently and effectively be met through membership in the Toastmasters International organization, the Rock Island District Army Corps of Engineers may authorize the payment of Toastmasters International membership fees as a necessary training expense pursuant to 5 U.S.C. §§ 4101-18 (1982). Army Corps of Engineers appropriations are not available to pay for trophies which are to be awarded to selected Toastmasters International members.

### DECISION

This decision is in response to a request from the Finance and Accounting Officer of the United States Army Corps of Engineers, Rock Island District. It concerns the propriety of using appropriated funds to pay membership fees and to purchase supplies for employees participating in the Toastmasters International organization. For the reasons stated below, the payment of the membership fees may be authorized. However, Army Corps of Engineers appropriations are not available to pay for trophies, for the purposes described.

Based on perceived employee needs and specific requests from two divisions to hold an on-site training course in public speaking, the Training and Development Branch of the Rock Island District Army Corps of Engineers investigated the various sources of public speaking training available. The sources investigated included Government and non-Government courses, as well as non-Government college courses. The Training and Development Branch determined that the most efficient and cost-effective method of supplying the training was to establish a Toastmasters International chapter. Toastmasters was chosen based on its reputation as an educational organization, the quality of the materials supplied, and the effectiveness of their training. As Toastmasters

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requires the payment of membership fees prior to obtaining training materials, payment of these fees was authorized by the Commanding Officer of the Rock Island District for each employee for whom it had been determined there was a need for public speaking training. The payment of related expenses was also authorized, and an invoice for six trophies at a total cost of \$41.70 was submitted for payment along with the \$68 invoice (\$2 per membership) representing the Toastmasters International membership fees.

The authority to establish Government employee training programs and to pay the expenses of such training is provided by the Government Employees Training Act, Pub. L. No. 85-507, 72 Stat. 527 (1958), codified at 5 U.S.C. §§ 4101-18 (1982). Under this Act, each agency has authority to conduct training programs for its employees using Government or non-Government facilities. 5 U.S.C. § 4103. However, while 5 U.S.C. § 4109(a) provides that under regulations prescribed under 5 U.S.C. § 4118(a)(8) an agency may pay for the necessary expenses of employee training, section 4109(b) states that--

"The expenses of training do not include membership fees except to the extent that the fee is a necessary cost directly related to the training itself or the payment of the fee is a condition precedent to undergoing the training."

The Office of Personnel Management (OPM) is responsible for prescribing regulations establishing requirements for the training of employees and is specifically authorized to establish regulations covering the requirements and limitations of section 4109. Under this authority, OPM has promulgated regulations giving agency heads the authority to determine what are necessary training expenses. Subchapter 6 of FPM Chapter 410.

The Department of the Army has delegated the authority to approve training at non-Government facilities to the commanders of the independent field activities. See Army Regulations, C2 AR 690-400, 410, subchapter 3, para. 3-6(e), June 15, 1983. Under this authority, the Commanding Officer of the Rock Island District Army Corps of Engineers approved the use of Toastmasters International as the source of public speaking training as recommended by the Training and Development Branch. It is clear from the record that the payment of the Toastmasters membership fees is not prohibited by 5 U.S.C. § 4109(b), quoted above, since the payment in this case is a condition precedent to undergoing the training offered by Toastmasters International. Moreover, the use of Toastmasters International as a source of public speaking training is supported by the OPM.

Accordingly, the membership fees may be paid as a training expense in this case. However, purchase of the six trophies is not authorized, as there has been no justification provided to support the view that this expense is necessary and incident to the public speaking training supplied by Toastmasters International.

*for* *Harvey R. Van Cleave*  
Comptroller General  
of the United States