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**DECISION**



**THE COMPTROLLER GENERAL  
OF THE UNITED STATES  
WASHINGTON 20548**

**FILE:** B-160579

**DATE:** April 26, 1978

**MATTER OF:** Reimbursement of Registration Fees

**DIGEST:** Claims by Government employees for reimbursement of registration fees which covered cost of meals served at meetings sponsored by local association may be allowed, where the meal costs were incidental to total registration fees assessed.

This action is in response to a request from Mr. S. B. Hendren, Budget and Accounting Officer for the United States Assay Office, Department of the Treasury, San Francisco, as to the propriety of paying three claims for reimbursement of registration fees.

Mr. Hendren states that these claims are submitted by the Officer in Charge, U.S. Assay Office, San Francisco, for himself and other U.S. Assay Office employees who attended certain meetings sponsored by the Federal Executive Board in San Francisco. The first claim is in the amount of \$4 as a registration fee for the attendance of the Officer in Charge at a Policy Committee Meeting on October 26, 1977. Included in this registration fee was the cost of a breakfast consumed by the claimant.

The second claim is in the amount of \$27.50 as a registration fee for the attendance of the Officer in Charge and four other U.S. Assay Office employees, guests at a Federal Employee Community Service Award Ceremony on September 28, 1977. The cost of a meal for each attendee was included in this registration fee.

The final claim is in the amount of \$17.25 as a registration fee for the attendance of the Officer in Charge and two other U.S. Assay Office employees at a Labor Management Briefing on November 15, 1977. Again the registration fee included the cost of a meal for each attendee.

Mr. Hendren wishes to know whether these registration fees may be reimbursed from appropriated funds since each fee included the cost of a meal for the Government employees who attended the meetings--normally a personal expense.

B-160579

The statutory rule is set out in 5 U.S.C. § 5946 (1976) which provides in pertinent part:

'Except as authorized by a specific appropriation, by express terms in a general appropriation, or by sections 4109 and 4110 of this title, appropriated funds may not be used for payment of—

\* \* \* \* \*

"(2) expenses of attendance of an individual at meetings or conventions of members of a society or association \* \* \*."

Section 4109(b) of title 5 provides that:

"(b) 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 that payment of the fee is a condition precedent to undergoing the training."

Section 4110 of title 5 provides that:

"Appropriations available to an agency for travel expenses are available for expenses of attendance at meetings which are concerned with the functions or activities for which the appropriation is made or which will contribute to improved conduct, supervision, or management of the functions or activities."

Clearly then registration fees may be reimbursed when they fall within the provisions of these statutes. However, from the limited information furnished it is not clear whether the registration fees in question also cover the cost of meals served in connection with the meeting or conference. In answering this question, our Office has held in B-166560, dated February 3, 1970, as follows:

B-160579

"It has been held by this Office that registration fees for attendance at a conference which includes the cost of meals-- no separate charge being made for meals-- may be allowed. 38 Comp. Gen. 134. However, where the meal is not a part of a registration fee, such as in the instant case, we have held there must also be a showing that the particular meal was incidental to the meeting; that the attendance of the employee was necessary to full participation in the scheduled meeting; and that he was not free to partake of his meals elsewhere without having been absent from essential formal discussions, lectures or speeches concerning the purpose of the conference."

Therefore, if the claims in question are within the applicable statutes mentioned above, and a determination is made along the lines indicated above, they may be allowed irrespective of whether the meal cost was included in the registration fees.

  
Deputy Comptroller General  
of the United States