



Comptroller General  
of the United States  
Washington, D.C. 20548

## Decision

**Matter of:** Use of Appropriated Funds to Pay for Recruiters to Attend Department of Defense Dependent Schools Job Fairs

**File:** B-252551

**Date:** May 28, 1993

### DIGEST

Department of Defense (DOD) may pay overseas travel expenses for recruiters from public schools to attend job fairs for teachers at DOD Dependent Schools provided DOD determines that the expenditure is necessary to accomplish the purpose of the appropriation charged.

### DECISION

Department of Defense has requested a decision on whether it may expend appropriated funds for travel and lodging costs of public school recruiters attending "job fairs" for teachers at DOD Dependent Schools (DODDS). So long as DOD determines that the proposed payments reasonably further the purpose of the appropriation charged, we would not object to such an expenditure.

According to DOD, many of the DODDS teachers overseas will be subjected to separation through reduction in force or early retirements as overseas defense forces are scaled down. DOD maintains that sending the recruiters is cost effective. DOD estimates the cost of a job fair at approximately \$10,000. According to DOD, if one teacher who is otherwise eligible for a \$25,000 early retirement incentive locates a job at a job fair, the job fair would pay for itself.

Alternatively, DOD suggests that most job offers are made to younger teachers, rather than to senior teachers who would qualify for early retirement incentives if DOD elected to offer such incentives. For every younger teacher who is offered and accepts a job, DOD would avoid one less personnel action through reductions in force in order to meet its staff reduction goals. In addition, DOD believes that sending recruiters overseas improves the morale of its teachers at a time when their job security is threatened.

The job fairs are to consist of seminars and counseling sessions for the teachers as well as interviews with the recruiters. DOD has conducted a survey to identify those

schools that have labor shortages and that would like to interview DODDS teachers but lack funds to send the recruiters overseas. DOD would like to pay reasonable travel and lodging expenses for the recruiters to participate. DOD proposes to condition payment to recruiters on the offer of jobs at the job fair.

We view outplacement assistance to employees as a legitimate matter of agency personnel administration, so long as such assistance benefits the agency. 68 Comp. Gen. 127 (1988). Assistance typically covers the employee's costs in attending seminars, training, and counseling sessions. However, the form of the assistance is not determinative, it is only a factor to be considered in determining whether the expense is necessary to accomplish the purpose of the appropriation to be charged. In this regard, the agency should consider the benefit to the agency expected from an expenditure of appropriated funds for outplacement assistance. Id. We also think it is appropriate for the agency to evaluate the efficiency of the proposed program in light of alternative forms of assistance.

Further, we do not believe that 31 U.S.C. § 1345 bars payment of the recruiters' travel expenses in this case. Section 1345 provides that except as specifically provided by law, and except for the expenses of officers or employees of the government carrying out official duties, appropriations may not be used for travel, transportation, and subsistence expenses for meetings. Section 1345 derives from Public Resolution No. 2, 74th Congress, 49 Stat. 19 (1935), which was enacted to prevent the expenditure of appropriated funds to honor the numerous applications which were then being received from various organizations requesting lodging, food and transportation for the purpose of holding "conventions or other form of assemblage or gathering." See 45 Comp. Gen. 476 (1966). When Congress codified title 31, United States Code, in 1982, the more generic term "meeting" was substituted for "conventions or other form of assemblage or gathering." Out of context, the word "meeting" suggests a broader coverage than the principal focus of section 1345 which was on conventions or other forms of assemblages or gatherings that various private organizations were seeking to hold at government expense. See 79 Cong. Rec. 709-711, 1109 (1935). Accordingly, we do not think that these job fairs or one-on-one interviews between job applicants and recruiters are the type of "meeting" the statute was intended to reach.

Provided DOD determines that the contemplated payments are necessary to accomplish the purpose of the appropriation to

be charged, we conclude that payment of travel expenses is appropriate, as the recruiters provide a direct benefit to the government.

*for Milton F. Fowler*  
Comptroller General  
of the United States