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Yers D. Huntsman, Authorized Certifying Officer,

Bureau of labor Statistics,

Department of labor.

Dear Mrs. Huntanan:

Reference is made to your latter dated February 28, 1969, wherein you request to be advised as to whether the voucher emclosed with your letter, stated in the amount of \$23.28, covering reimbursement for cost of a special luncheon given incident to the graduation excemonies and presentation of certificates by the Commissioner of Labor Statistics to Latin American Students, may be certified for payment.

The students involved have received grants as trainers to the Bureau of Laber Statistics in connection with the Cultural-Cooperation Program of the Department of State and the appropriation proposed to be charged was established by transfer from the appropriation "Cooperation with the American Republics" contained in the Department of State appropriation Act, 1969, approved June 3, 1968, 62 Stat.

313, such appropriation being specifically available for entertaiment expenses.

Although there is included on the woucher a charge of \$2 for a tip it appears that your primary doubt in the matter is due to the

fact that several officials representing other Government departments also attended the luncheon.

You state that the letter of allocation to the Department of Labor from the Secretary of State provides, with respect to entertainment, as follows:

"Of the sum of \$165,000 allocated to your Department, the amount of \$500 may be obligated during the 1969 fiscal year by your Department for official entertainment. In view of the limitation amounts imposed by the Appropriation Act, no other obligations may be incurred for official entertainment without advance authorization by the Department of State.

"The amount allocated for official entertainment may be apportioned in your discretion among the bureaus or offices participating in the program of the Committee and, as a matter of uniform administrative policy, may be obligated for the following purposes: (1) necessary and unavoidable expense insident to the reception, upon arrival in the United States, of trainees and other official visitors from the other American republics, as well as expenses incident to the extension of appropriate hespitality to such persons during their so journ in the United States; (2) expenses incident to the group entertainment in the United States of trainees and other official visitors; and (3) necessary expenses incident to the reciprocation of hespitality extended by officials of other governments or nationals of such governments to United States Governments or nationals of such countries under the provisions of Title III, Section 301, of the 'United States Information and Educational Exchange Act of 1948."

In view of the foregoing it clearly appears that the east of the aforesaid lummbers, inserer as the students and proper officials of the Bureau of Labor Statistics are consermed, constitutes a proper charge against the transfer appropriation involved and in view of the prevailing custom in such cases, reasonable charges for tips properly say be included in the cost of the entertainment so furnished.

Insemuch as it was not the purpose of the luncheon to furnish entertainment for representatives of other Covernment agencies and since it was administratively deemed desirable in extending hospitality and cultivating cordial relations to have these Government representatives

who were directing and supervising the training program present ath the lumchess—even though attached to other Government establishments—relaborasement for the expense incident to their participation also constitutes a proper charge against the said appropriation. Accordingly, the voucher, if otherwise correct, may be cartified for payment.

The voucker is returned herewith.

Respectfully,

Comptroller General of the United States.

Reclouve.