FEDERAL ELECTION COMMISSION		
MANUAL OF DIRECTIVES	COMMISSION DIRECTIVE	
	REVOKES Directive No. 30 Dated June 1, 2000	**NO. 30 (Revised)** **Effective Date** October 5, 2006
Circulation Authority; Invitation Policy		

Invitation Policy

The Invitation Policy is designed to establish guidelines for the acceptance and coordination of public appearances by Commissioners and Commission staff members.

All requests for Commission speakers and meetings or briefings with Commission representatives will be considered invitations, subject to this policy.

The following situations, however, will not be covered by the Invitation Policy:

- FEC Conferences, State Outreach programs and office meetings scheduled by staff members (e.g., Report Analysts, Public Affairs Specialists) in the normal course of their job.
- Interviews with Commissioners and staff by the media (e.g., press, book or broadcast).
- Meetings with a Commissioner or staff member in his or her individual capacity (i.e., meetings that focus primarily on the individual views of the FEC Commissioner or staff).

I. Acceptance of Invitations by Commissioners and Staff Members

A. Commissioners and staff members will provide copies of the invitation to the Information Division ten working days prior to the date of the event (time permitting).

B. Commissioners and staff members will advise the Information Division as to:
   1. whether the invitation has been accepted or declined,
   2. whether reimbursement for meals, travel or lodging is offered, and is necessary, and
   3. what support services will be required.

C. Invitations received directly by the Information Division which do not request a specific Commissioner or staff member will either
   1. be forwarded to the Chairman's office for consideration, or
   2. in those instances where the needs of the group would more appropriately be met by a public affairs specialist (e.g., a reporting workshop), be assigned to a staff member.

D. If the Chairman is unable to accept an invitation, the Information Division will simultaneously notify all Commissioners' offices of the invitation request, using the FEC's internal e-mail system. In the event that two or more Commissioners are interested in accepting the invitation, the Commissioner's office that first notifies the Information Division will be given priority.

E. If the Information Division does not receive a response from any of the Commissioners' offices within three work days, it will assume that none of the Commissioners can accept the invitation. In that case, the Information Division will make the invitation available to a staff member.

F. Invitations received by staff members must be coordinated with the staff member's supervisor.

G. Requests made by foreign visitors that are not received via the Department of State or a visitor program associated with the Department of State will be routed through the Congressional Affairs Liaison.
   1. The invitation will be circulated simultaneously to the Chairman and Congressional Affairs Liaison.
   2. Congressional Affairs Liaison will contact the Department of State to ensure the visit is not in conflict with US Policy.

3. The Congressional Affairs Liaison will make the Commissioners and Information Division aware of any requests that are of concern to the Department of State.

II. Coordination of Invitation Policy by the Information Division

A. The Information Division will maintain the master file of all invitations received by Commissioners and staff members. The master file will consist of:
   1. the letter of invitation,
   2. notations on the disposition of the invitation,
   3. the reimbursement memo, if required,
   4. interagency communications, and
   5. the circulation memo.

B. When appropriate, the Information Division will circulate, on a 24-hour no-objection basis, a reimbursement memo, through the Staff Director, to the Commission, requesting Commission approval of sponsor reimbursement for travel, meals and/or lodging expenses. See Section IV-B below for Reimbursement Criteria.

C. The Information Division will circulate a memo to the Commission, through the Staff Director, announcing recently accepted invitations, including those that were recently approved for reimbursement.

D. The Information Division will provide support services (as needed and time permitting) for invitations that involve groups visiting the Commission including:
   1. reserving the hearing room (or other appropriate room),
   2. notifying the guard of the visitors' arrival,
   3. preparing visitor packets, and
   4. arranging for tours of the Public Records Office.

E. The Information Division will provide support services for out-of-town invitations, including:
   1. mailing Commission publications,
   2. publicizing the event through non-media sources, and
   3. providing other support, as requested.

III. Press Office Support

The Press Office, as needed or as requested, will consult with the individual(s) accepting the invitation and the sponsoring organization to provide for the arrangement of press coverage.

IV. Reimbursement Criteria

A. Travel and subsistence costs related to out-of-town public appearances by Commissioners and staff members may be paid for by the Commission. The Commission may pay only those expenses essential to the transaction of official business. Alternatively, travel and subsistence costs may be paid for by the sponsoring organization under the circumstances outlined below in Section IV-B.

B. An offer of reimbursement from the sponsoring organization will be reviewed by the Information Division and the Designated Agency Ethics Official to determine if it may be accepted as:

1. a gift to the agency pursuant to 31 U.S.C. § 1353, if the organization is a nonfederal entity; if payment for a Commissioner or staff member's travel is circulated under this statute, the agency shall report the payment to the Office of Government Ethics in accordance with 41 C.F.R. § 304-6.4.
2. a gift to the agency staff member pursuant to 5 U.S.C. § 4111, if the organization is a nonprofit organization, exempt from taxation under 26 U.S.C. § 501(c)(3); if payment for a Commissioner or staff member's travel is circulated under this statute, then the Commissioner or staff member must disclose this gift on his/her personal financial disclosure reports (if applicable); or
3. a gift to the agency staff member pursuant to 5 U.S.C. § 7342 (Foreign Gifts Act), if the organization is a foreign government.

C. The Information Division will inform the Commissioner or staff member of the Designated Agency Ethics Official's determination on whether or not the reimbursement may be accepted.

D. Commissioners and staff members accepting invitations involving travel and subsistence expenses should be available to accept additional invitations in the same city or on route to or from the city.

V. Ethical Considerations

A. No Commissioner or staff member shall solicit payment for travel, subsistence, and related expenses from a non-Federal source. *See* 41 C.F.R. § 304-3.5. However, after receipt of an invitation from a non-Federal source to attend a meeting or similar function or in the course of discussions of an event to be sponsored jointly by the agency and the non-Federal source, the agency or staff member may inform the non-Federal source of the agency's authority to accept payment of these expenses pursuant to 31 U.S.C. § 1353. *See* 41 C.F.R. § 304-3.6.

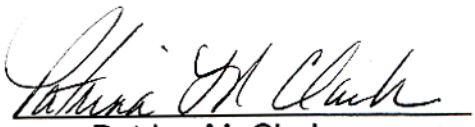
B. The Commission shall not accept payment of travel expenses from a non-Federal source when a Commissioner or staff member is invited to attend a promotional vendor training program or other meetings held for the primary purpose of marketing the non-Federal source's products or services. *See* 41 C.F.R. § 304-2.1.

C. Commissioners and staff members shall not actively participate in a fundraising activity of a candidate for partisan political office or of a political party, or partisan political group. *See* 5 C.F.R. §§ 734.303 and 734.410(b).

D. No Commissioner or staff member should publicly support a candidate, political party, or political committee subject to the jurisdiction of the Commission. *See* 11 CFR § 7.11(a)(1).

E. When deciding whether or not to accept an invitation, Commissioners and staff members shall take into consideration whether the date of the appearance conflicts with Commission meetings or other functions requiring their presence.

This Directive was adopted on October 5, 2006.



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