

PAVIR Policy on Meals and Refreshments at Meetings

- I. **PURPOSE:** To define the policy, guidelines and procedures for meals, refreshments and other expenses at meetings.
- II. **RATIONALE:** Meetings, which includes conferences, workshops, seminars, grand rounds, town halls, symposia, and other similar gatherings are accepted features of conducting research, education and business. Additionally, certain events, such as retreats may be necessary for the conduct of business. At any of these meetings it may be appropriate to serve meals or refreshments.

Various regulations, the federal ethics standards and the statute that authorizes PAVIR influence whether expenditures related to such events are appropriate uses of PAVIR funding. Consequently, to be considered for PAVIR support by direct payment or reimbursement, PAVIR has established the following policy.

- III. **POLICY:** To be eligible, a meeting must have a documented research, education or business purpose. PAVIR funds will not be used for "entertainment" expenses such as social activities, parties, or those that provide amusement.

Federal Uniform Guidance states that the cost of entertainment, including amusement, diversion and social activities and associated costs are unallowable, except where specific costs that might otherwise be considered entertainment have a programmatic purpose and are authorized either in the approved budget for the Federal Award or with prior written approval of the awarding agency.

- IV. **GUIDELINES:** Following are guidelines and requirements for PAVIR funds being used for meals and refreshments at meetings.

1. Requirements:

1. The request must include an explicit statement about the research, education or business rationale for the event, that is, how it will further VA research, VA education/training or PAVIR's business.
2. Accompanying documentation should include a program, agenda or topic of discussion, meeting location, presenter(s), roster of attendees and each attendee's organizational affiliation.
3. When applicable, the request should tie the meeting to an approved research project. If for education, the education activity itself must be approved by the VAPAHCS Education Committee.
4. For other appropriate PAVIR business events, which include but are not limited to, employee morale, team building, employee engagement, retreats, employee recognition, and recruitment purposes, the request must include an explicit statement of how the meeting will further PAVIR's ability to facilitate research, education and/ or its operations.

2. Factors that PAVIR will consider when evaluating a request for meetings may include but are not limited to:

1. Whether at least one speaker makes a research, educational or business presentation.
 2. Whether there is a non-VAPAHCS speaker and/or non-VAPAHCS personnel are among the expected attendees.
 3. The frequency of similar meetings that may involve the same personnel.
 4. Whether the activity is included in an approved budget.
 5. Whether the supporting documentation adequately supports the business purpose.
 6. Whether the request is for routine VAPAHCS staff, committee or department meetings. Generally, PAVIR will not pay for meal expenses for such meetings.
 7. Whether the meeting involves at least one individual who is being recruited to join VAPAHCS.
 8. Whether the meeting extends through a normal mealtime to make efficient use of staff time.
3. To ensure compliance with PAVIR policies, Contracts & Grants and/or Accounting staff will review requests for meetings.
4. PAVIR will provide reimbursement for reasonable meeting costs based on submission of original receipts. Non-detailed credit card receipts are not sufficient documentation for reimbursement.
5. All requests for payment or reimbursement must be made in a timely manner. Reimbursement requests submitted

more than 60 days after the expense was incurred must include a completed Justification for Late Submission form and may be denied. Reimbursements submitted more than one year from the date of incurrence will be denied. If PAVIR accepts the requestor's justification for late submission and does not deny reimbursement, the reimbursement must be reported to the IRS as taxable income to the requestor.

6. PAVIR strongly recommends that meeting organizers obtain pre-approval. Events lacking pre-approval may be denied in whole or in part. Pre-approval may be obtained by submitting an email request with the following information:

- Meeting rationale
- Proposed meeting location
- Proposed agenda
- Proposed presenter(s)
- Proposed attendees and their organizational affiliation
- Proposed food arrangements