UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 27 2018

OFFICE OF
CHIEF FINANCIAL OFFICER

The Honorable Trey Gowdy
Chairman
Committee on Oversight and Government Reform
U.S. House of Representatives
Washington, D.C. 20515

Dear Mr. Chairman:

This supplements the U.S. Environmental Protection Agency's response to your letter, dated February 20, 2018, regarding past air travel of Administrator Pruitt. As the Controller in the Office of the Chief Financial Officer, I am responsible for developing, managing, and supporting the agency's federal financial management programs. As part of these functions, I also oversee EPA's travel program to ensure compliance with federal travel regulations.

As you know, travel for executive branch agencies is regulated by the Federal Travel Regulation, which the General Services Administration issues. The FTR states that "[w]hen exceptional security circumstances require other than coach-class airline accommodations," an agency "may authorize/approve first class accommodations" 41 C.F.R. § 301-10.123(a)(3). "Exceptional security circumstances are determined by [an] agency and should only be authorized up to the minimum other than coach-class accommodation necessary." *Id.* These circumstances include, but are not limited to, situations when the "[u]se of coach-class accommodations would endanger [one's] life or Government property" or an agent on protective detail is "accompanying an individual authorized to use other than coach-class accommodations." *Id.* § 301-10.123(a)(3)(i), (ii). The regulations for an agency to approve/authorize business-class accommodations mirror those for first-class accommodations. *See* 41 C.F.R. § 301-10.123(b)(2).

Pursuant to FTR § 301-50.3, all reservations must be made in the agency's Electronic Travel System, Concur, or by calling the EPA's Travel Management Center, BCD Travel. Travelers must call BCD Travel directly for all other than coach-class travel accommodations. BCD Travel also has a VIP hotline that typically assists with political senior leadership travel reservations, which includes the EPA Administrator. When official federal government travel is necessary, an itinerary for the trip is given to a travel preparer. The travel preparer will then log into Concur and book reservations for the trip, as well as start the Travel Authorization to fund the trip. For the EPA Administrator, the travel preparer will call the VIP hotline directly to make travel accommodations. Travel authorizations requesting other than coach-class accommodations will then obtain prior approval by the EPA Senior Resource Official for the class of service being used by citing the relevant exceptions within the FTR and submitting a request to the proper agency authority. Proof of the exception approval would be noted in the system, attained by a memorandum, and attached to the Concur TA. In addition to airline travel exceptions, additional

authorization would be needed in Concur for exceptions, including but not limited to, using a non-contract carrier, actual lodging exceeding per diem rate by 150 percent or more, and rental car reservations.

Each time a traveler, including the EPA Administrator, requests other than coach-class accommodations and cites the security circumstances exception, the travel preparer will confer with EPA's Office of Criminal Enforcement and Forensic Training, Protective Service Detail. OCEFT, along with other partners in the Agency that have a role in law enforcement, reviews collected information related to an actual or potential threat and develops a security threat assessment in advance of travel, to confirm the security needs. OCEFT reviews all known individuals who have previously threatened or expressed an inappropriate/unusual interest in the EPA Administrator. After receiving confirmation, the travel preparer would note the exception in Concur and attach a memorandum to notify the authorizer that the security concerns still existed.

Once all reservations are booked, they are included in the TA, where all the non-reservation expenses (*e.g.*, meals, taxis, etc.) are also added. Upon completion of this process, the preparer can sign the TA on the traveler's behalf and send it to the authorizer, who would look to see that the trip is justified and all expenses are reasonable. After the trip is reviewed and approved by the authorizer, it is sent to the funder to allocate funding and to ensure that the appropriate justifications are included. For the EPA Administrator, once his trip is approved by the authorizer, his reservations will be ticketed and he can conduct his official business travel.

Once the traveler returns from the official business trip, the traveler hands all the expense receipts from the trip to the travel preparer. The preparer then creates a voucher based on the receipts, adjusting the estimates from the TA to match the actual incurred cost. When the voucher is complete, it must be reviewed and signed by the traveler before moving to the next step in the process. The traveler's signature attests that all expenses are accurate to their knowledge and justified for official travel. After the traveler signs the voucher, it would go to the authorizer for review and approval. The authorizer would ensure all costs are reasonable, match the receipts provided, and all expenses are justified. Once it is signed by the authorizer, the voucher is sent to EPA's payment office. The payment office verifies that expenses match receipts; approvals are attached for any exceptional expenses, and pays the voucher.

Enclosed please find supplemental information and documentation responsive to your request for official air travel of the Administrator, including airfare and other travel information.

Sincerely,

Jeanne Conklin

Jeanne Conklin
Controller

Enclosures

cc: Eric Baptist
Holly Greaves
David Bloom
Kevin Minoli
Henry Barnet
Elise Packard
RobinH Richardson
Susan Bodine
Meshell Jones-Peeler
Marcella Burke
Jessica Taylor