Employee Post-Travel Disclosure of Travel Expenses

Date/Time Stamp:
RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS
2018 MAR -8 PM 4:09

Post-Travel Filing Instructions: Complete this form within **30 days** of returning from travel. Submit all forms to the **Office of Public Records in 232 Hart Building.**

In compliance with Rule 35.2(a) and (c), I make the following disclosures with respect to travel expenses that have been or will be reimbursed/paid for me. I also certify that I have attached:

☒ The **original** *Employee Pre-Travel Authorization* (Form RE-1), **AND**
☒ A **copy** of the *Private Sponsor Travel Certification Form* with all attachments (itinerary, invitee list, etc.)

Private Sponsor(s) (list all): Cooperative for Assistance and Relief Everywhere (CARE)

Travel date(s): February 17-23, 2018

Name of accompanying family member (if any): _____

Relationship to Traveler: ☐ Spouse ☐ Child

IF THE COST OF LODGING **DID NOT INCREASE** DUE TO THE ACCOMPANYING SPOUSE OR DEPENDENT CHILD, ONLY INCLUDE LODGING COSTS IN EMPLOYEE EXPENSES. (Attach additional pages if necessary.)

Expenses for Employee:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate ☒ Actual Amount	$2,691.26	$945.00	$285.93	Insurance: $81; Security: $737.36; Interpreter: $54.76; Visa: $239.00

Expenses for Accompanying Spouse or Dependent Child (if applicable):

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses (Amount & Description)
☐ Good Faith Estimate ☐ Actual Amount				

Provide a description of all meetings and events attended. *See* Senate Rule 35.2(c)(6). (Attach additional pages if necessary.): Please see Addendums A and B

3/8/2018 (Date)

Michelle Greenhalgh (Printed name of traveler)

M. Greenhalgh (Signature of traveler)

TO BE COMPLETED BY SUPERVISING MEMBER/OFFICER:

I have made a determination that the expenses set out above in connections with travel described in the *Employee Pre-Travel Authorization* form, are necessary transportation, lodging, and related expenses as defined in Rule 35.

3/8/2018 (Date)

Jeanne Shaheen (Signature of Supervising Senator/Officer)

(Revised 1/3/11)

Form RE-2

FINAL

ADDENDUM A

AGENDA: CARE Learning Tour to Zambia, February 17-23, 2018
Note: See Addendum B below for an explanation of schedule changes

Saturday, February 17 — **Travel Day**

10:00am	Depart U.S. for Lusaka, Zambia (Ethiopian Airlines #501)

Sunday, February 18 — **Travel Day/Lusaka, Zambia**

2:50pm	CARE delegation arrives in Lusaka, Zambia (Ethiopian Airlines #873)
3:30-4:00pm	Transfer to hotel
4:00-6:00pm	Check-in/unpacking/shower time
6:00-6:30pm	Welcome briefing to provide an overview of trip and introduce CARE staff and delegates to one another
6:30-8:00pm	Scene-setter briefing with local technical experts

Overnight: Latitude 15 Degrees Hotel – Lusaka Zambia

Monday, February 19 — **Lusaka, Zambia**

8:45-10:15am	Breakfast briefing with U.S. Mission
10:15-11:30am	Transfer to site visit 1
11:30-1:00pm	Site visit 1: Tour rural health post and home visits with community health workers to learn about barriers to accessing health services for rural populations and understand the role CHWs play in connecting these communities to the health system
1:00-2:15pm	Transfer to site visit 2 *Note: Lunch provided on vehicles*
2:15-3:30pm	Site Visit 2: Visit a DREAMS Center to gain a deeper understanding of community-based interventions to prevent and manage the spread of HIV/AIDS among vulnerable young women
3:30-4:00pm	Transfer to hotel
4:00-6:15pm	Downtime
6:15-6:30pm	Transfer to U.S. Ambassador's residence

FINAL

6:30-8:30pm	Reception with U.S. Ambassador, local government and NGO leaders to discuss the role of international partners, Local governments and NGOs in development in Zambia
8:30-8:45pm	Transfer to hotel

Overnight: Latitude 15 Degrees Hotel – Lusaka, Zambia

Tuesday, February 20 **Lusaka / Livingstone, Zambia**

Breakfast on own at hotel

8:30-9:00am	Transfer to meeting
9:00-10:00am	Meeting with the Zambian Minister of Health to discuss the health priorities of the Zambian Government
11:00-11:30am	Transfer to airport
10:30-12:00pm	Plane Briefing on the "three delays" driving maternal mortality *Note: Transfer to Livingstone; Lunch on the plane*
12:00-12:30pm	Transfer to site visit 1 *Note: lunch provided on vehicles*
12:30-1:45pm	Site visit 1: One-stop gender-based violence center to understand how integrated health, psychosocial support and legal services are being provided to women and vulnerable youth, reducing the barriers to accessing critical health and support services
1:45-2:15pm	Transfer to site visit 2
2:15-3:15pm	Site visit 2: Village Savings and Loan Association (VSLA) group to learn how women who are financially empowered are able to generate income and provide for their families, helping mothers to also afford transportation costs to access more comprehensive health services for themselves and their families
3:15-3:45pm	Transfer to hotel
3:45-4:00pm	Check-in/downtime at hotel
5:45-6:15pm	Transfer to Dinner
6:15-8:00pm	Debrief dinner to reflect on the "three delays" that contribute to maternal mortality
8:00-8:30pm	Transfer to hotel

Overnight: AVANI Hotel – Livingstone, Zambia

Wednesday, February 21 **Kalomo/Lusaka, Zambia**

Breakfast on own at hotel

8:30-10:30am	Transfer to site visit 1
10:30-11:45am	Site visit 1: Scaling Up Nutrition program to learn about interventions to support improved maternal and child health and reduce stunting and malnutrition among infants and newborn children in Zambia
11:45-12:30pm	Transfer to site visit 2
12:30-2:00pm	Site visit 2: Tour Safe Motherhood 360+ training and capacity-building program to see how innovative mentorship models are helping to strengthen the ability of health providers to respond to emergency prenatal, neonatal and postnatal health needs to reduce maternal and infant mortality
2:00-4:30pm	Transfer to airport
4:30-6:00pm	Plane debrief on health systems strengthening Note: Transfer to Lusaka
6:00-6:30pm	Transfer to hotel
6:30-7:30pm	Check-in/down time at hotel
7:30-9:00pm	Closing dinner to discuss policy objectives and trip takeaways

Overnight: Latitude 15 Degrees Hotel – Lusaka, Zambia

Thursday, February 22 **Lusaka, Zambia/Travel Day**

Breakfast on own at hotel

9:00-9:30am	Transfer to site visit 1
9:30-10:45am	Site visit 1: Youth safe-space center to meet vulnerable youth empowered to resist child marriage, understand and advocate for their own health and build healthier communities
10:45-11:15am	Transfer to hotel
11:15-11:45am	Final packing and check out time
11:45-12:15pm	Transfer to airport

FINAL

1:25pm Delegation departs for Washington, DC (Ethiopian Airlines #863)

Friday, February 23 **Travel Day**

7:50am Delegation lands in Washington, DC (Ethiopian Airlines #500)

ADDENDUM B

Explanation of Schedule Change

We originally planned to use chartered planes for our movements in Zambia o reduce our transfer times. However, due to changing weather patterns and safety concerns, which arose during the week of our trip, we decided against using chartered planes for one of our transfers from Livingstone to Kalomo and to instead drive to site locations on February 21, 2018. The agenda was adjusted after the Ethics Committee pre-trip paperwork deadline to accommodate this shift and account for drive times while still maintaining most of our original site and meeting selections, although we did have to cancel a planned lunch with midwives on the afternoon of February 21st due to our condensed schedule caused by the need to drive to sites rather than use the charted planes.

CARE USA
1899 L St NW
Suite 500
Washington, DC 20036
USA
www.care.org

January 15, 2018

United States Senate Select Committee on Ethics
220 Hart Senate Building
Washington, DC 20510

RE: CARE Learning Tour to Zambia, February 17-23, 2018

To Whom It May Concern:

Over the past eight years, the CARE Learning Tours program has provided policymakers and influential opinion leaders the unique opportunity to see firsthand the impact of U.S. foreign assistance investments on health and development worldwide. CARE has engaged members of Congress and key staff from both political parties as well as influential opinion leaders on these Learning Tours.

On this CARE Learning Tour, we will be sponsoring a trip to Zambia, which will include staffers from congressional offices in the Senate and House of Representatives. This trip has been funded with the assistance of a grant provided to CARE by the Bill & Melinda Gates Foundation with the purpose of raising awareness about the importance of U.S. investments in confronting global poverty. A portion of the activities funded by the grant include congressional travel, and CARE is using some of the grant funds to support this specific trip. The Foundation did not play a role in organizing the trip, and has not been involved in the selection or invitation of travel participants. This funding had not been earmarked for this specific trip as stated in Item 7 on the Private Sponsor Travel Certification Form.

We are committed to ensuring adherence to all Ethics Committee rules and regulations. For further information about CARE's advocacy and lobbying structure, please see the attached description. If you have any questions, please feel free to contact me at (202) 569-7027.

Sincerely,

Rachel Hall

Rachel Hall
Deputy Director, Learning Tours
CARE USA

CARE and CARE Action Now Structure Explained
Updated: September 2, 2016

CARE, a 501(c)(3) organization, is a leading international humanitarian organization fighting global poverty that places special focus on working alongside poor women who, equipped with the proper resources, can assist whole families and entire communities escape poverty through improved basic education, prevent the spread of HIV, increase access to clean water and sanitation, and expand economic opportunities and the protection of natural resources. CARE also delivers emergency aid to survivors of war and natural disasters, and helps people rebuild their lives.

CARE established CARE Action Now in October, 2007 as a related but separately incorporated 501(c)(4) organization. Served by a mostly independent Board of Directors, CARE Action Now undertakes a variety of programs and activities in furtherance the organizations' comparable missions, most notably directly influencing policymakers through public awareness campaigns, briefings, reports, meetings, testimony and other areas based on CARE's experience of working with poor people around the world over more than 60 years. The two organizations share facilities and resources, allocating the costs between them based upon use, as is common in the nonprofit sector. CARE provides grant funding to CARE Action Now to support the range of its advocacy and lobbying activities. CARE Action Now is increasingly raising funds independent of CARE. This is a common structure for related nonprofit organizations, where a 501(c)(3) organization uses some of its limited funding on lobbying to support a related 501(c)(4) rather than doing the lobbying directly itself.

CARE serves as common paymaster for both organizations, so that all shared employees receive one paycheck from CARE for services provided to either CARE or CARE Action Now. CARE Action Now reimburses CARE for its allocable share of salary, benefits, and payroll taxes. All staff time that qualifies as "lobbying activity" under the Lobbying Disclosure Act that is conducted by staff registered as lobbyists for CARE Action Now is charged to CARE Action Now under this arrangement, although those employees may also perform non-lobbying services for CARE. CARE Action Now treats its reimbursement payments to CARE as expenditures for salary and related items on its books.

This relationship which is consistent with customary practice leads us to conclude that CARE has properly completed this form, including that it does not employ or retain lobbyists. However, we include this additional information in the interests of full transparency so that the committee may make this determination for itself.

BILL & MELINDA GATES *foundation*

1300 I (Eye) Street NW
Suite 200 East
Washington, DC 20005, USA
V +1.202.662.8130
F +1.202.220.6799
www.gatesfoundation.org

January 15, 2018

United States Senate Select Committee on Ethics
220 Hart Senate Building
Washington, DC 20510

This letter is submitted in response to your request regarding a learning trip beginning February 17, 2018. The Bill & Melinda Gates Foundation (the "Foundation") made a grant to CARE USA on January 5, 2017 to fund various activities, including congressional tours to provide learning opportunities on U.S. foreign assistance programs.

I send this to confirm that the Bill & Melinda Gates Foundation is aware of this project and provided support, through the assistance of grant funding, to CARE USA for this project for the purpose of providing members of Congress, Congressional staff, other key decision-makers and influential individuals with the personal experience and knowledge of U.S. Government programs in the developing world and to provide follow-on information to tour participants, selecting countries that have a broad array of U.S. Government development projects.

However, the Foundation did not play a significant role in the project, or in organizing the related trip, and has not been involved in the selection or invitation of travel participants. Decisions regarding travel participants have been controlled by and under the sole discretion of CARE USA. Foundation funding has not been directly or indirectly earmarked to finance any aspect of this trip and, as defined in the grant agreement, grant funds, may not be earmarked for activities that are considered lobbying under the tax law provisions governing private foundations. Furthermore, the Bill & Melinda Gates Foundation does not retain or employ a registered federal lobbyist or foreign agent.

If we can provide any additional information, please contact me at dana.deruiter@gatesfoundation.org , or 202.370.8958.

Sincerely,

Dana DeRuiter
Senior Program Officer
Bill & Melinda Gates Foundation

PRIVATE SPONSOR TRAVEL CERTIFICATION FORM

This form must be completed by any private entity offering to provide travel or reimbursement for travel to Senate Members, officers, or employees (Senate Rule 35, clause 2). Each sponsor of a fact-finding trip must sign the completed form. The trip sponsor(s) must provide a copy of the completed form to each invited Senate traveler, who will then forward it to the Ethics Committee with any other required materials. The trip sponsor(s) should **NOT** submit the form directly to the Ethics Committee. Please consult the accompanying instructions for more detailed definitions and other key information.

The Senate Member, officer, or employee **MUST** also provide a copy of this form, along with the appropriate travel authorization and reimbursement form, to the Office of Public Records (OPR), Room 232 of the Hart Building, within thirty (30) days after the travel is completed.

---

1. Sponsor(s) of the trip (please list all sponsors): Cooperative for Assistance & Relief Everywhere, Inc. (CARE)

2. Description of the trip: To showcase the positive reach and scope of U.S. investments in programs that support maternal and child health interventions in Zambia

3. Dates of travel: February 17-23, 2018

4. Place of travel: Zambia

5. Name and title of Senate invitees: See Addendum A

6. I *certify* that the trip fits one of the following categories:

   ☒ (A) The sponsor(s) are not registered lobbyists or agents of a foreign principal **and** do not retain or employ registered lobbyists or agents of a foreign principal **and** no lobbyist or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

   – OR –

   ☐ (B) The sponsor or sponsors are not registered lobbyists or agents of a foreign principal, but retain or employ one or more registered lobbyists or agents of a foreign principal and the trip meets the requirements of Senate Rule 35.2(a)(2)(A)(i) or (ii) *(see question 9)*.

7. ☒ I *certify* that the trip will not be financed in any part by a registered lobbyist or agent of a foreign principal.

   – AND –

   ☒ I *certify* that the sponsor or sponsors will not accept funds or in-kind contributions earmarked directly or indirectly for the purpose of financing this specific trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal.

8. I *certify* that:

   ☒ The trip will not in any part be planned, organized, requested, or arranged by a registered lobbyist or agent of a foreign principal except for *de minimis* lobbyist involvement.

   – AND –

   ☒ The traveler will not be accompanied on the trip by a registered lobbyist or agent of a foreign principal except as provided for by Committee regulations relating to lobbyist accompaniment (*see question 9*).

9. **USE ONLY IF YOU CHECKED QUESTION 6(B)**
I *certify* that if the sponsor or sponsors retain or employ one or more registered lobbyists or agents of a foreign principal, one of the following scenarios applies:

☐ (A) The trip is for attendance or participation in a one-day event (exclusive of travel time and **one** overnight stay) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip.

– OR –

☐ (B) The trip is for attendance or participation in a one-day event (exclusive of travel time and **two** overnight stays) and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *on any segment* of the trip (*see questions 6 and 10).*

– OR –

☐ (C) The trip is being sponsored only by an organization or organizations designated under § 501(c)(3) of the Internal Revenue Code of 1986 and no registered lobbyists or agents of a foreign principal will accompany the Member, officer, or employee *at any point* throughout the trip.

10. **USE ONLY IF YOU CHECKED QUESTION 9(B)**
If the trip includes two overnight stays, please explain why the second night is practically required for Senate invitees to participate in the travel:

11. ☒ An itinerary for the trip is attached to this form. I *certify* that the attached itinerary is a detailed (hour-by-hour), complete, and final itinerary for the trip.

12. Briefly describe the role of each sponsor in organizing and conducting the trip:

CARE is host to the delegation and is responsible for logistics, content of the trip and post-trip follow up. The Bill & Melinda Gates Foundation provided general support for this initiative as part of a broader grant, but played no role in organizing the trip and its participants.

13. Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:

CARE is a leading humanitarian organization focused on combating global poverty. We place a special emphasis on women and girls because when they are equipped with the proper resources they help their families and communities escape poverty. CARE has operated in Zambia since 1992.

14. Briefly describe each sponsor's prior history of sponsoring congressional trips:

CARE hosts congressional trips as an educational opportunity to see development work firsthand. Since 2009, we have hosted twenty-five trips with members of Congress and their staff.

15. Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):

CARE International works in over 90 countries around the world implementing programming as well as promoting visibility on issues important to ending global poverty and leading advocacy toward local and international actors to prioritize poverty-combatting initiatives.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
☒ Good Faith estimate ☐ Actual Amounts	$3,455.68	$806	$373	Interpreters, Security, Insurance, visa: $1,021

17. State whether a) the trip involves an event that is arranged or organized *without regard* to congressional participation **or** b) the trip involves an event that is arranged or organized *specifically with regard* to congressional participation:

The trip was arranged specifically with regard to congressional participation.

18. Reason for selecting the location of the event or trip

The U.S. government is an important development partner in Zambia working to promote improved health outcomes for women and children.

19. Name and location of hotel or other lodging facility:

Latitude 15 Degrees Hotel - Lusaka, Zambia

Avani Hotel - Livingstone, Zambia

20. Reason(s) for selecting hotel or other lodging facility:

The hotels above offer western accommodations with ample security for the trip's activities.

21. Describe how the daily expenses for lodging, meals, and other expenses provided to trip participants compares to the maximum per diem rates for official Federal Government travel:

The U.S. Government per diem rate for lodging in Lusaka is $190/night and Livingstone is $236/day

The U.S. Government per diem rates for meals in Lusaka is $95/day, in Livingstone is $103 day, and in

Choma is $80/day. Our costs are at these rates.

22. Describe the type and class of transportation being provided. Indicate whether coach, business-class or first class transportation will be provided. If first-class fare is being provided, please explain why first-class travel is necessary:

The delegation will fly coach class to and from Zambia. The delegation will fly on a chartered plane

for travel in Zambia. See addendum B for flight details.

23. ☒ I represent that the travel expenses that will be paid for or reimbursed to Senate invitees do not include expenditures for recreational activities, alcohol, or entertainment (other than entertainment provided to all attendees as an integral part of the event, as permissible under Senate Rule 35).

24. List any entertainment that will be provided to, paid for, or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:

No entertainment will be provided on this trip.

25. I hereby *certify* that the information contained herein is true, complete and correct. (You must include the completed signature block below for each travel s

Signature of Travel Sponsor: Rachel L Hall

Name and Title: Rachel Hall, Deputy Director, Learning Tours

Name of Organization: Cooperative for Assistance and Relief Everywhere, Inc. (CARE)

Address: 1899 L Street, NW, Suite 500, Washington, DC 20036

Telephone Number: 202-569-7027

Fax Number: 202-296-8695

E-mail Address: Rachel.hall@care.org

Instructions

(Do not file the Instructions with OPR)

General Instructions

- The Senate Select Committee on Ethics ("Ethics Committee") has developed guidelines for evaluating privately-sponsored trips and for judging whether trip expenses are reasonable. Trip sponsors should consult the *Senate Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel*, including the *Glossary of Terms*, prior to filling out the *Private Sponsor Travel Certification Form* and contact the Ethics Committee at (202) 224-2981 with any additional questions. The Ethics Committee will make the final determination as to whether the expenses incurred during a privately-sponsored trip are reasonable.

- If there are multiple sponsors, they should jointly complete one *Private Sponsor Travel Certification Form* for the trip. Each travel sponsor should complete the signature block.

- When evaluating a trip proposal and judging the reasonableness of expenses, the Ethics Committee will consider the following factors:

  a. the stated mission of the organization sponsoring the trip;
  b. the organization's prior history of sponsoring congressional trips, if any;
  c. other educational activities performed by the organization besides sponsoring congressional trips;
  d. whether any trips previously sponsored by the organization led to an investigation by the Select Committee on Ethics;
  e. whether the length of the trip and the itinerary is consistent with the official purpose of the trip;
  f. whether there is an adequate connection between a trip and official duties;
  g. the reasonableness of the total amount spent by a sponsor of the trip;
  h. whether there is a direct and immediate relationship between a source of funding and an event;
  i. the maximum *per diem* rates for official Federal Government travel published annually by the General Services Administration, the Department of State, and the Department of Defense;
  j. whether travel to a location or event is arranged or organized without regard to congressional participation, or whether it is specifically organized for Congressional staff; and
  k. any other factor deemed relevant by the Select Committee on Ethics.

  Consult the *Senate Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel*, including the *Glossary of Terms*, for further discussion of these factors.

- Responses to each question should be brief, consistent with the requirement to provide all relevant information. Attach additional pages, as necessary.

- To allow sufficient time for the Ethics Committee to review requests for privately sponsored travel, the participating Senate Members, officers, and employees must submit the completed form to the Ethics Committee at least **thirty (30) days** before the date of the proposed trip.

Filling out the Private Sponsor Travel Certification Form (Question by Question Instructions)

1. *Sponsor(s) of the trip (please list all sponsors):* A sponsor of a trip is any person, organization, or other entity contributing funds or in-kind support for the trip. A sponsor must have a significant role in organizing and conducting a trip and must have a specific organizational interest in the purpose of the trip. If Members, officers, and employees are participating in an event or fact-finding trip in connection with their duties, they may accept necessary travel expenses only from the event or trip sponsor.

2. *Description of the trip:* Provide a brief statement about the purpose of the trip.

3. *Dates of travel:* Provide the dates of departure and return.

4. *Place of travel*: Provide the destination(s) for the trip.

5. *Name and titles of Senate invitees:* Provide the name and title for each Senate Member, officer, or employee who is invited on the trip.

6. *I certify that the trip fits one of the following categories:* A Senate Member, officer, or employee may accept privately sponsored travel only from sponsor(s) of a trip that fits one of the categories listed. Consult the instructions for question 9 to determine if the trip meets the lobbyist accompaniment standard.

7. *Financing of the trip, earmarked funds and in-kind contributions:* Senate Members, officers, and staff may not accept privately-sponsored travel funded by a registered lobbyist or foreign agent. Members, officers, and staff may not participate in privately-sponsored travel when the sponsors accept funds or in-kind contributions earmarked for this particular trip from a registered lobbyist or agent of a foreign principal or from a private entity that retains or employs one or more registered lobbyists or agents of a foreign principal. Earmarking includes any direction, agreement, or suggestion -- formal or informal -- to use donated funds, goods, services, or other in-kind contributions for a particular trip or purpose.

8. *Lobbyist/agent of a foreign principal involvement:* Senate invitees may not participate in trips planned, organized, arranged, or requested by a lobbyist or foreign agent in more than a *de minimis* way, which means negligible or inconsequential. It would be considered inconsequential for one or more lobbyists or foreign agents to serve on the board of an organization that is sponsoring travel, as long as the lobbyists or foreign agents are not involved in the trip. It is also permissible for a lobbyist to respond to a trip sponsor's request to identify Senate invitees with interest in a particular issue relevant to a planned trip. However, a lobbyist is not allowed to solicit or initiate communication with a trip sponsor, have control over which Senate employees are invited on a trip, extend or forward an invitation to a participant, determine the trip itinerary, or be mentioned in the invitation.

   Example: A trip sponsor that is a § 501(c)(3) non-profit organization asks a lobbyist to recommend staffers who might be most interested in joining a trip to the U.S.-Mexican border. If a lobbyist knows a staffer who has a particular interest in the DEA's activities at the border, then providing that information (in light of the trip sponsor's request), in and of itself, would not exceed a *de minimis* level of participation, and would be permitted. However, it would not be permissible for the lobbyist to initiate contact with the trip sponsor to suggest that a particular Senate staffer be invited or forward an invitation to that staffer. Consult the instructions for question 9 to determine if the trip meets the lobbyist accompaniment standards.

9. *Lobbyist/agent of a foreign principal accompaniment standards:* Senate Members, officers, and staff may not accept privately-sponsored travel from an entity that retains or employs one or more federally-registered lobbyists or foreign agents unless one of the listed scenarios applies. *At any segment of the trip* means lobbyists may not accompany the Senate invitee for parts of the travel to and from the event (not at the event itself or the location being visited). *At any point throughout the trip* means lobbyists may not accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited, other than in a *de minimis* way. This is a broader prohibition than the *at any segment of a trip* standard.

   "De minimis" exception: Both lobbyist/agent of a foreign principal "accompaniment" prohibitions include a *de minimis* exemption. *De minimis* means negligible or inconsequential. The mere coincidental presence of a lobbyist or foreign agent at an event would likely be considered *de minimis*. But in making the final determination, the Ethics Committee will consider the totality of the circumstances, including the amount of time lobbyists or foreign agents are present at the event; the amount of direct contact they have with Senate invitees; and the amount of control a trip sponsor has over their presence or contact with Senate guests. For example, if the trip includes attendance at an event considered widely-attended under Rule 35(1)(c)(18), the trip sponsor is unlikely to know all attendees present. Thus, it is likely to be permissible for such widely-attended events to include both a Senate guest and a lobbyist. Similarly, an organization cannot possibly know all the other passengers taking the same flight or other common carrier to a given destination. Accordingly, the sponsor does not need to certify that it knows for certain that no lobbyist or foreign agent will be on such a common carrier.

10. *If travel includes two overnight stays:* The Ethics Committee may approve two overnight stays for trips sponsored by an entity that employs or retains one or more lobbyists or foreign agents under certain conditions. Consult Committee regulations for additional information.

11. *An itinerary for the trip is attached to this form:* The Ethics Committee will not review the trip request without a detailed (hour-by-hour), complete and final itinerary for the trip. As a general matter, the Ethics Committee advises that each travel day contain a minimum of 6 hours of officially-related activities for Senate invitees.

12. *Briefly describe the role of each sponsor in organizing and conducting the trip:* A sponsor must have a significant role in organizing and conducting a trip and must have a specific organizational interest in the purpose of the trip.

13. *Briefly describe the stated mission of each sponsor and how the purpose of the trip relates to that mission:* Provide a brief description of the stated mission of each sponsor and how it relates to the trip.

14. *Briefly describe each sponsor's prior history of sponsoring congressional trips:* Provide a brief discussion of the sponsor's history of sponsoring congressional travel. It is not necessary to list every trip.

15. *Briefly describe the educational activities performed by each sponsor (other than sponsoring congressional trips):* Provide a brief description of the educational activities performed by each sponsor. It is not necessary to list every individual activity; the description may be by kind or category of educational activity involved.

16. *Total expenses for each participant:* Indicate whether the figures provided are actual amounts or good faith estimates by checking the appropriate box. All trip expenses should be included. Expenses other than those for transportation, lodging, and meals must be individually listed and specified. Attach additional pages as necessary.

17. *Congressional participation:* For events that are arranged without regard to congressional participation (for example, annual meetings, conferences, seminars, and symposiums of trade associations, professional societies, business associations, and other membership organizations), the Ethics Committee may, but is not required to, allow Senate Members, officers, and employees to accept lodging and meal expenses that are commensurate with what is customarily provided to non-congressional attendees in similar circumstances. For events specifically arranged around congressional participation, lodging, meal expenses and other expenses must be "reasonable" in accordance with Ethics Committee regulations.

18. *Reason for selecting the location of the event or trip:* The location of the trip *must be related to its purpose*. A brief but detailed description of the reason for the selection of the location must be provided.

19. *Name and location of hotel or other lodging facility:* Include the exact name and address of the hotel or other lodging facility.

20. *Reasons for selecting hotel or other lodging facility:* Provide an explanation of the sponsor's rationale for selecting the particular lodging, include information such as proximity to the airport or site to be visited.

21. *Describe how the daily expenses for lodging, meals, and other expenses provided to trip participant compare to the maximum per diem rates for official Federal Government travel:* Where feasible and available, trip expenses for lodging and meals should generally be comparable to the government *per diem* rates. The circumstances surrounding a particular trip may legitimately require lodging and meal expenses to exceed these rates. Consult the Ethics Committee regulations for additional information.

22. *Describe the type and class of transportation being provided:* While coach or business-class fare may be accepted, first-class fare for any mode of transportation may be permitted only under limited conditions and only with specific prior written approval by the Ethics Committee. Transportation on a private or charter aircraft is not permitted for privately-sponsored travel under any circumstances.

23. *Expenses for recreational activity, alcohol, or entertainment:* The only recreational or entertainment activities that will be approved by the Ethics Committee are those that are provided to all attendees and are an integral part of an event. Alcoholic beverages are not considered to be a reasonable expense.

24. *List any entertainment that will be provided to, paid for or reimbursed to Senate invitees and explain why the entertainment is an integral part of the event:* Entertainment expenses that are not provided to all attendees and deemed an integral part of the event will not be approved by the Ethics Committee.

25. *Certification:* Each sponsor of a trip should sign the form and certify that the information is complete and correct. Attach additional pages with the certification and signature block, as necessary, for each trip sponsor.

Addendum A:
Names and titles of ALL Senate invitees and explanation of why the individual was invited.

We invited staffers handling global health issues for members of Congress and committee staff on the following committees. These committees hold a particular relevance to the issue of U.S. foreign assistance and global maternal/child health which will be the focus of the trip agenda.

Senate Appropriations Committee
Senate Budget Committee
Senate Foreign Affairs Committee

Invited Staffers

- Heather Flynn Senior - Professional Staff Member, Senate Foreign Relations Committee, Minority Staff
- Olivia Kurtz - Legislative Director, Sen. Susan Collins (R-ME)
- Arne Owens - Health Care Policy Advisor, Senate Foreign Relations Committee, Majority Staff
- Chris Farrar - Legislative Assistant, Sen. John Boozman (R-AR)
- Michelle Greenhalgh - Legislative Assistant, Sen. Jeanne Shaheen (D-NH)
- Ryan K. Evans - Legislative Assistant, Sen. Johnny Isakson (R-GA)
- Wesley Kungel - Legislative Director, Sen. Joe Manchin (D-WV)
- Kate Cassling - Legislative Assistant, Sen. Joe Manchin (D-WV)
- Jennifer Boyer - Senior Health Policy Advisor, Senate Health, Education, Labor, and Pensions Committee, Majority Staff
- Bethany Poulos - Legislative Assistant, Sen. Marco Rubio (R-FL)
- Sophia Lalani - Legislative Assistant, Sen. Cory Booker (D-NJ)
- Laura Updegrove - Foreign Policy Advisor, Sen. Jeff Merkley (D-OR)
- Igor Khrestin - Legislative Assistant, Sen. Cory Garnder (R-CO)
- Brad Bowman - National Security Advisor, Sen. Todd Young (R-IN)
- Jamie Morgan - Military Legislative Assistant, Sen. Catherine Cortez Masto (D-NV)
- Morgan Griffin - Legislative Assistant, Sen. Lisa Murkowski (R-AK)
- Anna Dietderich - Legislative Correspondent, Sen. Lisa Murkowski (R-AK)
- Grace Stuntz - Health Policy Director, Senate Health, Education, Labor, and Pensions Committee, Majority Staff
- Melissa Pfaff - Health Policy Advisor, Senate Health, Education, Labor, and Pensions Committee, Majority Staff
- Jay Sulzmann - Legislative Director, Sen. Johnny Isakson (R-GA)
- Nathan Bergerbest - Deputy Chief of Staff, Sen. Lisa Murkowski (R-AK)
- Michelle Romo - Policy Fellow, Sen. Jeff Merkley (D-OR)
- Erin Reif - Senior Policy Adviser, Sen. Lamar Alexander (R-TN)
- Ryan Kaldahl - Professional Staff Member, Senate Select Committee on Intelligence
- Laurel Sakai - Professional Staff Member, Senate Health, Education, Labor, and Pensions Committee, Minority Staff
- Andy Vogt - Health Professional Staff Member, Senate Health, Education, Labor, and Pensions Committee, Majority Staff

Addendum B:
Cities of Departure:

Saturday, February 17, 2018:
10:00am – Depart Washington, DC (ET # 501)

Sunday, February 18, 2018:
7:15am – Arrive Addis Ababa, Ethiopia
9:25am – Depart Addis Ababa, Ethiopia (ET 873)
2:50pm – Arrive Lusaka, Zambia

Tuesday, February 20, 2018:
10:30am – Depart Lusaka, Zambia (charter flight)
12:00pm – Land in Livingstone, Zambia

Wednesday, February 21, 2018:
8:30am – Depart Livingstone, Zambia (charter flight)
9:30am – Land in Kalomo, Zambia

4:30pm – Depart Kalomo, Zambia (charter flight)
5:30pm – Land in Lusaka, Zambia

Thursday, February 22, 2018:
1:25pm – Depart Lusaka, Zambia (ET #863)
8:35pm – Arrive Addis Ababa, Ethiopia
11:00pm – Depart Addis Ababa, Ethiopia (ET #500)

Friday, February 23, 2018:
7:50am – Arrive in Washington, DC

Addendum C:

On Tuesday, February 20 the delegation will travel on a chartered flight from Lusaka to Livingstone, Southern Province region in Zambia. On Wednesday, February 21, the delegation will travel on a chartered flight from Livingstone, Southern Province to Kalomo, Southern Province, then back to Lusaka, Zambia.

Due to our schedule and limited flight options in country, as well as rough road conditions in Zambia, we have selected to charter a plane operated by Pro Charter. The cost of the charter plane is expected to be around $1,300 per person. The Airline Operating Certificate (AOC) is forthcoming.

FINAL

AGENDA: CARE Learning Tour to Zambia, February 17-23, 2018

Saturday, February 17 — **Travel Day**

10:00am	Depart U.S. for Lusaka, Zambia (ET #501)

Sunday, February 18 — **Travel Day/Lusaka, Zambia**

2:50pm	Delegation arrives in Lusaka, Zambia (ET #873)
3:30-4:00pm	Transfer to hotel
4:00-6:00pm	Check-in/unpacking/shower time
6:00-6:30pm	Welcome briefing to provide an overview of trip and introduce CARE staff and delegates to one another
6:30-6:45pm	Transfer to reception
6:45-8:30pm	Reception with U.S. Ambassador, local government and NGO leaders to discuss the role of international partners, local governments and NGOs in development in Zambia
8:30-9:00pm	Transfer to hotel

Overnight: Latitude 15 Degrees Hotel – Lusaka, Zambia

Monday, February 19 — **Lusaka, Zambia**

8:45-10:15am	Scene-setter breakfast briefing with technical experts to gain social, political, historical context for development and health in Zambia
10:15-11:30am	Transfer to site visit 1
11:30-1:00pm	Site Visit 1: Tour Rural health post and home visits with community health workers to learn about barriers to accessing health services for rural populations and understand the role CHWs play in connecting these communities to the health system
1:00-2:15pm	Transfer to site visit 2 *Note: Lunch in vehicles*
2:15-3:30pm	Site visit 2: Visit DREAMS center to gain a deeper understanding of community-based interventions to prevent and manage the spread of HIV/AIDS among vulnerable young women
3:30-4:00pm	Transfer to hotel
4:00-6:30pm	Shower/Dinner preparation time

6:30-8:15pm	Dinner briefing with U.S. Mission to learn about the U.S. government's development and health priorities in Zambia

Overnight: Latitude 15 Degrees Hotel – Lusaka, Zambia

Tuesday, February 20 **Livingstone, Zambia**

Breakfast on own

8:30-9:00am	Transfer to meeting
9:00-10:00am	Meeting with Minister of Health (requested) to discuss the health priorities of the Zambian Government
10:00-10:30am	Transfer to airport
10:30-12:00pm	Plane Briefing on the "three delays" driving maternal mortality *Note: Transfer to Livingstone; Lunch on the plane*
12:00-12:30pm	Transfer to site visit 1
12:30-1:45pm	Site visit 1: Visit one-stop gender-based violence center to understand how integrated health, psychosocial support and legal services are being provided to women and vulnerable youth, reducing the barriers to accessing critical health and support services
1:45-2:15pm	Transfer to site visit 2
2:15-3:15pm	Site visit 2: Visit CARE Village Savings and Loan Association (VSLA) program to learn how women who are financially empowered are able to generate income and provide for their families, helping mothers to also afford transportation costs to access more comprehensive health services for themselves and their families
3:15-3:45pm	Transfer to hotel
3:45-6:00pm	Check-in/shower time
6:00-6:30pm	Transfer to debrief dinner
6:30-8:00pm	Debrief dinner to reflect on the "three delays" that contribute to maternal mortality
8:00-8:30pm	Transfer to hotel

Overnight: Avani Lodge – Livingstone, Zambia

Wednesday, February 21 **Kalomo/Lusaka, Zambia**

Breakfast on own

8:00-8:30am	Transfer to airport
8:30-9:30am	Transfer to Kalomo
9:30-10:30am	Transfer to site visit 1
10:30-11:30am	Site visit 1: Visit Scaling Up Nutrition project to learn about interventions to support improved maternal and child health and reduce stunting and malnutrition among infants and newborn children in Zambia
11:30-12:15pm	Transfer to lunch
12:15-1:45pm	Lunch with midwives to learn about the skills-building activities and technical training they have received from visiting U.S. midwives to improve maternal and child health outcomes, mitigate birth-related health risks and empower midwives to respond to a wider array of possible health complications, helping to build the capacity of Zambia's health workforce
1:45-2:30pm	Transfer to site visit 2
2:30-3:45pm	Site visit 2: Tour Safe Motherhood 360+ training and capacity-building program to see how innovative mentorship models are helping to strengthen the ability of health providers to respond to emergency prenatal, neonatal and postnatal health needs to reduce maternal and infant mortality
3:45-4:30pm	Transfer to Kalomo
4:30-5:30pm	Plane debrief on health systems strengthening *Note: Transfer to Lusaka*
5:30-6:00pm	Transfer to hotel
6:00-7:30pm	Check-in/shower time
7:30-9:00pm	Closing dinner to discuss policy objectives and trip takeaways

Overnight: Latitude 15 Degrees Hotel – Lusaka, Zambia

Thursday, February 22 **Lusaka, Zambia/Travel Day**

9:00-9:30am	Transfer to site visit 1
9:30-10:45am	Site Visit 1: Visit safe space center to meet vulnerable youth empowered to resist child marriage, understand and advocate for their own health and build healthier communities
10:45-11:15am	Transfer to hotel

11:15-11:45am	Final packing and check out time
11:45-12:15pm	Transfer to airport
1:25pm	Delegation departs for Washington, DC (ET #863)

Friday, February 23 — **Travel Day**

7:50am	Delegation lands in Washington, DC (ET #500)

CARE USA
1899 L St NW
Suite 500
Washington, DC 20036
www.care.org

December 5, 2017

Michelle Greenhalgh
Health Legislative Assistant
Senator Jeanne Shaheen
506 Hart Senate Office Building
Washington, DC 20510

Dear Michelle,

I'd like to invite you to join CARE's next Learning Tour to Zambia to examine the impact of U.S. investments in global health, maternal and child health, and women's empowerment. This trip will take place February 17-22, 2018 (including travel) during the President's Day Congressional recess and will include Congressional staffers and key leaders from the corporate sector, technical experts, and the media working on these issues.

On your journey, you will visit programs and meet with beneficiaries in Zambia to see firsthand how critical U.S. investments are making a difference. You'll learn from experts on the ground –including the government, private sector and local partners who are working toward solutions at the community level, as well as government decision-makers who implement those solutions on the national and regional stage.

On this trip we will be traveling to Zambia, a country that despite some recent economic recovery and growth, still grapples with high rates of poverty and very weak health indicators – including maternal and child health. Approximately 80 percent of rural households and 64 percent of urban households live in poverty and 4 in every 5 children are too short for their age, a symptom of chronic malnutrition and food insecurity. Although Zambia has made progress in increasing access to primary education, reducing infant mortality, and combating HIV/AIDS, the country continues to struggle with poor sanitation and health infrastructure. Many women lack access to information and necessary health services to safely deliver and care for children and at present only two thirds of those births are attended by a skilled health professional.

The United States is actively working to change this reality. U.S. investments in women's economic empowerment, combatting child marriage and violence, and promoting health and nutrition are having a measurable and significant impact in Zambia throughout the region. This Learning Tour will be a unique opportunity to explore these issues on the ground and return to Capitol Hill with a deeper understanding of the link between U.S. assistance and improvements in family health outcomes, community development, and global health advancements.

In order to allow sufficient time for planning, we appreciate a response indicating your interest by **Friday, December 15, 2017**. We have asked Rachel Hall to provide further details on the trip and answer any questions. You can reach her directly at Rachel.Hall@care.org or (202) 609-6353.

Thank you for considering this opportunity.

Sincerely,

David Ray
Vice President for Policy & Advocacy
CARE USA

JOHNNY ISAKSON, GEORGIA, CHAIRMAN
CHRISTOPHER A. COONS, DELAWARE, VICE CHAIRMAN

PAT ROBERTS, KANSAS
JAMES E. RISCH, IDAHO

BRIAN SCHATZ, HAWAII
JEANNE SHAHEEN, NEW HAMPSHIRE

DEBORAH SUE MAYER, CHIEF COUNSEL AND STAFF DIRECTOR
EMILY GERSHON, CHIEF CLERK

HART SENATE OFFICE BUILDING, ROOM 220
SECOND AND CONSTITUTION AVENUE, NE
WASHINGTON, DC 20510-6425

TELEPHONE: (202) 224-2981
FACSIMILE: (202) 224-7416
TDD: (202) 228-3752

United States Senate

SELECT COMMITTEE ON ETHICS

February 8, 2018

Michelle Greenhalgh
Office of Senator Jeanne Shaheen
United States Senate
Washington, DC 20510

Dear Ms. Greenhalgh:

This responds to your recent correspondence concerning an invitation you received to travel on a learning tour to Zambia, on February 17-23, 2018, sponsored by the Cooperative for Assistance and Relief Everywhere, Inc. (CARE). CARE certified to the Select Committee on Ethics (the Committee) that it will pay the *necessary expenses*[1] related to the travel and that it is neither a lobbyist, nor lobbying firm, nor agent of a foreign principal, and it is not otherwise acting as a representative or agent of a foreign government. CARE has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist will accompany you at *any point throughout your trip.*[2]

Based on information and materials available to the Committee, and assuming the **actual** travel and travel-related expenses conform to the information and materials you provided, it appears that the proposed payment or reimbursement of necessary expenses for this trip **may be accepted** under relevant Senate Rules and the Committee's *Regulations and Guidelines for Privately-Sponsored Travel*, so long as at the time of the payment or reimbursement, CARE is neither a registered lobbyist nor lobbying firm under the Lobbying Disclosure Act of 1995, nor an agent of a foreign principal under the Foreign Agents Registration Act (and is not otherwise acting as a representative or agent of a foreign government), and provided the travel and all required documents are disclosed to the Secretary of the Senate in accordance with the provisions of Senate Rules 34 and 35.

Under Senate Rule 35, Senate staff must receive advance authorization signed by the Member or officer under whose direct supervision the individual works in order to accept payment or reimbursement for necessary expenses related to fact-finding travel. Further, such authorization and expenses must be disclosed to the Secretary of the Senate by filing the completed *Employee Pre-Travel Authorization* and the *Employee Post-Travel Disclosure of Travel Expenses* (Form RE-1 and Form RE-2), along with a copy of the *Private Sponsor Travel Certification Form,* and all relevant attachments (e.g., the private sponsor's invitation and

[1] The term "necessary expenses" has a specific definition. *See Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 8.

[2] The term "any point throughout your trip" has a specific definition. *See Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2.

itinerary) **within 30 days of the conclusion of Privately-Sponsored Travel.**

The Committee has determined that § 501(c)(3) non-profit organizations that are classified as private foundations, as opposed to public charities, may not pay for transportation from the United States to a foreign country.[3] However, CARE represented to the Committee that it is a § 501(c)(3) public charity, as opposed to a private foundation, pursuant to the Internal Revenue Code.[4]

Please be advised that the United States Constitution prohibits the acceptance of any gift, including a meal, from a foreign government without the consent of Congress. In the Foreign Gifts and Decorations Act (FGDA), Congress consented to the acceptance by federal government officials of: (1) gifts of minimal value and (2) travel or the expenses for travel taking place entirely outside the United States, from a foreign government (which includes those acting as a representative or agent of a foreign government).[5] The Senate has defined minimal value as $100 or less. Further, pursuant to FGDA, there are certain reporting and procedural requirements that are imposed upon Members, officers, and employees who accept gifts from a foreign government. Please review the Committee's "Dear Colleague" letter of January 16, 2018 setting forth the items to be included in filing that report.

Finally, Senate Rule 34 requires a reporting individual,[6] on his or her Financial Disclosure Report, to make an annual disclosure of the receipt of payments or reimbursements under Senate Rule 35 from a private sponsor for officially-related travel expenses where, in the aggregate, travel expenses exceed $390 from that sponsor during a calendar year. However, if a Member, officer, or employee properly reports the receipt of necessary expenses for such travel to the Secretary of the Senate within 30 days of the travel, as discussed above, the travel expenses need not be disclosed a second time on their Financial Disclosure Report.

If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,

Deborah Sue Mayer
Chief Counsel and Staff Director

Enclosure: Travel Checklist

---

[3] *See* 26 U.S.C. § 4941 et seq. Section 501(c)(3) of the Internal Revenue Code broadly defines non-profit, charitable, tax-exempt organizations. These § 501(c)(3) organizations are then further defined or designated as "public charities" and "private foundations."

[4] 26 U.S.C. § 501(c)(3).

[5] 5 U.S.C. § 7342.

[6] A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 ($126,148 for CY 2018) or is a political fund designee and is required to file Financial Disclosure Reports.

EMPLOYEE PRE-TRAVEL AUTHORIZATION

Date/Time Stamp:

Pre-Travel Filing Instructions: Complete and submit this form at least 30 days prior to the travel departure date to the **Select Committee on Ethics** in **SH-220**. Incomplete and late travel submissions will **not** be considered or approved. This form **must** be typed and is available as a fillable PDF on the Committee's website at ethics.senate.gov. Retain a copy of your entire pre-travel submission for your required post-travel disclosure.

Name of Traveler: Michelle Greenhalgh

Employing Office/Committee: Senator Jeanne Shaheen

Private Sponsor(s) (list all): Cooperative for Assistance & Relief Everywhere, Inc. (CARE)

Travel date(s): February 17-23, 2018

*Note: If you plan to extend the trip for any reason you **must** notify the Committee.*

Destination(s): Zambia

Explain how this trip is specifically connected to the traveler's official or representational duties:

This trip will showcase the positive reach and scope of U.S. investments in programs that support maternal and child health interventions in Zambia. The trip relates to the traveler's representational duties per her covering the global health portfolio, including maternal and child health for the Senator as she serves on the Senate Foreign Relations Committee and the Senate Appropriations Committee.

Name of accompanying family member (if any): _____

Relationship to Employee: ☐ Spouse ☐ Child

I certify that the information contained in this form is true, complete and correct to the best of my knowledge:

1/16/2018
(Date)

M. Greenhalgh
(Signature of Employee)

TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Senator Jeanne Shaheen *(Print Senator's/Officer's Name)* hereby authorize Michelle Greenhalgh *(Print Traveler's Name)*

an employee under my direct supervision, to accept payment or reimbursement for necessary transportation, lodging, and related expenses for travel to the event described above. I have determined that this travel is in connection with his or her duties as a Senate employee or an officeholder, and will not create the appearance that he or she is using public office for private gain.

I have also determined that the attendance of the employee's spouse or child is appropriate to assist in the representation of the Senate. *(signify "yes" by checking box)* ☐

1/16/2018
(Date)

Jeanne Shaheen
(Signature of Supervising Senator/Officer)

(Revised 10/19/15)

Form RE-1