

Employee Post-Travel Disclosure of Travel Expenses

Date/Time Stamp:

RECEIVED
SECRETARY OF THE SENATE
PUBLIC RECORDS

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.**

2022 SEP 13 AM 10:35

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): The Aspen Institute Inc. (Socrates Program) ("AISP")

Travel date(s): 08/26/2022, 08/27/2022, 08/28/2022

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	\$240.62	\$252.00	\$229.95	\$393.50
☒ Actual Amount				

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.): AISP's Emerging Governance Leaders Seminar, which focused on developing skills applicable to Congressional work,

building informal networks key to career advancement & support, providing participants access to Aspen Institute's programming.

9/9/22 MANDAR JADHAV
 (Date) (Printed name of traveler)

[Signature]
 (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.

9/9/2022
 (Date)

Bill Cassidy, M.D.
 (Signature of Supervising Senator/Officer)

Print This Form...

Clear Form

Date/Time Stamp:

EMPLOYEE PRE-TRAVEL AUTHORIZATION

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: Mandar JadhavEmploying Office/Committee: Senator Bill CassidyPrivate Sponsor(s) (list all): The Aspen Institute Inc. (Socrates Program) ("AISP")Travel date(s): August 26-28, 2022

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

Destination(s): Charlottesville, VA

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

The program involves the study of historical documents and contemporary commentary on relationship between the legislative and executive branches. This will help the traveler better understand committee processes and jurisdiction as pertains to his portfolio of mental health programs, health data privacy, and care of those dually eligible for Medicare & Medicaid. It will also help him craft text for reauthorization & reform bills to provide appropriate administrative discretion. Readings include material on the Congressional budget process as well, which the traveler must learn in order to draft healthcare amendments for reconciliation bills.

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:

8/2/22
 (Date)


 (Signature of Employee)

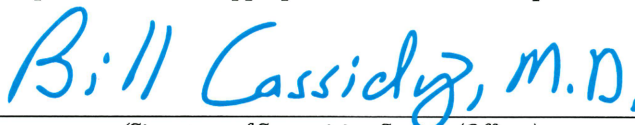
TO BE COMPLETED BY SUPERVISING SENATOR/OFFICER (President of the Senate, Secretary of the Senate, Sergeant at Arms, Secretary for the Majority, Secretary for the Minority, and Chaplain):

I, Bill Cassidy hereby authorize Mandar Jadhav
 (Print Senator's/Officer's Name) (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) ☐

08/02/2022
 (Date)


 (Signature of Supervising Senator/Officer)

SOCRATES PROGRAM

 aspen institute

Dear Participant,

I am pleased to let you know that you have been selected to participate in the Emerging Governance Leaders Seminar Series at Thomas Jefferson's Monticello located in Charlottesville, Virginia from August 26 – 28, 2022.

The Socrates Program will provide shuttles departing from Capitol Hill to Monticello on Friday, August 26th at 5:00 p.m. and returning on Sunday, August 28th at 2:30 p.m. Should you accept attendance, it is required that you participate through the duration of the seminar. Your lodging and meals will be paid for by the Aspen Institute Socrates Program. Under the ethics rules, no expenses are provided for entertainment or recreation. To reserve space on the shuttle, please complete the registration form.

This seminar is designed for the educational benefit of a bipartisan, bicameral group of Congressional staff focusing on the foundations of Congress and its role in the nation's governance. Our purpose is education, not advocacy. To participate, you will need to submit the requisite travel forms and secure approval from the Ethics Committee. Attached to this email, you will find the ethics packet which contains the (1) completed primary trip sponsor form and (2) the program agenda.

Please submit all required documentation to the Ethics Committee by Monday, July 25th, 2022:

- (1) Primary Trip Sponsor Form (2) Agenda and (3) Invitation** (all provided by the Aspen Institute) and **(4) Traveler Form**, (available on the Ethics website, <https://ethics.house.gov/forms/travel>) due by **Monday, July 25th, 2022. Travel forms must be submitted to the Ethics Committee no later than thirty days before travel commences or you will not be eligible to attend.**

COVID-19 Safety Policy

Aspen Institute Covid Policy requires all participants show proof of vaccination. Please be sure to input your information into the ReturnSafe app as outlined in the attachment by **COB, August 20th**.

Here are a few additional items to facilitate your planning:

Lodging – participants will all be staying at 200 South Street Inn in Charlottesville, Virginia. To secure your housing, please ensure you have completed the registration form. If you have any questions regarding logistics and travel, please feel free to call Socrates Program Coordinator, Arielle Lyons at 970-618-4020

Seminar materials – the seminar readings (PDFs), schedule, and arrival details will be sent to you approximately 2-3 weeks before the seminar. Note: a summary of the seminar topic and moderator biography are attached.

Kind Regards,



Cordell Carter, II | The Aspen Institute
Director, Socrates Program
2300 N St. NW, Suite 700
Washington, DC 20037

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): The Aspen Institute Inc. (Socrates Program) ("AISP")
2. Description of the trip: The AISP is sponsoring a Socrates seminar to discuss leadership, responsible governance and the role of Congress.
3. Dates of travel: August 26-28, 2022
4. Place of travel: Charlottesville, VA
5. Name and title of Senate invitees: See attached Appendix
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:

The Aspen Institute Socrates Program is the sole sponsor of the seminar and organized and conducted the trip (including selected the participants, developed the agenda, planned the seminar, and coordinated the travel). (See attached Appendix)

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

The Aspen Institute is an educational and policy studies non-partisan, non-profit organization whose mission is to foster leadership based on enduring values and provide a non-partisan forum for the exchange of ideas

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

The Aspen Institute has a nearly forty year history of conducting non-partisan educational congressional trips; The Socrates Program, specifically, also has conducted congressional trips.

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

The Aspen Institute organizes numerous educational activities, including briefings, round tables, forums, and conferences for a diverse range of attendees including federal and state policy makers, business and organization leaders, members of the press, and the general public.

16. Total Expenses for Each Participant:

	Transportation Expenses	Lodging Expenses	Meal Expenses	Other Expenses
☒ Good Faith estimate	\$240.62	\$252.00	\$172.50	\$627.84
☐ Actual Amounts				

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:

B) The trip involves an event that is organized specifically with regard to congressional participation.

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

Thomas Jefferson's Monticello in Charlottesville, VA is close to Washington, D.C., which provides for ease of travel for participants and moderator(s). It also historically relevant to the seminar topic.

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

200 South Street Inn

200 West Street, Charlottesville VA 22902

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

Close proximity to seminar location and rates equal to per diem rates for Albemarle County.

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 daily expenses for lodging, meals, and other expenses are equal to the per diem

rates for official Federal Government travel.

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:

Round-trip transportation will be provided by chartered, coach-class bus between Washington D.C. and Charlottesville and between the hotel and seminar location daily.

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:

None

25. I hereby *certify* that the information contained herein is true, complete and correct. (For trips involving more than one sponsor, you *must* include a completed signature page for each additional sponsor):

Signature of Travel Sponsor: 

Name and Title: Elliot Gerson EVP Public and Policy Programs

Name of Organization: The Aspen Institute Inc.

Address: 2300 N. St. NW 700 Washington, D.C. 20037

Telephone Number: (202) 736-5859

Fax Number:

E-mail Address: lisa.jones@aspeninstitute.org

Question 5: Name and titles of Senate Invitees:**Prerna Bhat**

Climate, Energy, and Environmental Policy Legislative Aide
Office of Senator Elizabeth Warren

Ishan Mehta

Legislative Assistant
Office of Senator Brian Schatz

Mandar Jadhav, MD

Policy Adviser
Office of Senator Bill Cassidy

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

The Aspen Institute has received general support and unrestricted funds from the Democracy Fund to support the Aspen Institute Socrates Program. These foundation funds were not earmarked for a specific trip and the Democracy Fund did not participate in organizing or conducting the trip.

Question 16: Add detail on total expenses for each participant

Other expenses: \$627.84 includes conference room meeting facilities and tour of Monticello



Emerging Governance Leaders Seminar
Leadership & the Role of Congress

Seminar will be moderated by Dr. Colleen Shogan
(Dr. Shogan will moderate all program sessions and mealtime discussions)

Seminar Weekend Schedule

August 26th – 28th, 2022

Monticello

Charlottesville, Virginia

Seminar Location: Montalto

This weekend seminar will focus on three aspects: 1) developing skills that are applicable to the legislative body; 2) building informal networks that are key to career advancement and support; and 3) provide participants access to a range of Aspen Institute programming. This opportunity will provide staffers and those interested in government careers with experiences and tools to help them thrive in their current roles and better position themselves for longer, more impactful careers in the U.S. Congress.

Friday, August 26th

5:00 p.m.	Shuttle departure from Capitol Hill
7:30 p.m.	Shuttle arrives in Charlottesville
7:30 p.m. – 8:15 p.m.	Seminar Check-In & Reception <i>200 South Street</i>
8:00 p.m. – 9:30 p.m.	Socrates Opening Dinner and Program <i>200 South Street</i>

Conversation will consider the governance challenges of Congress, exploring what resources and knowledge inform Congress and how technology and changing norms of representation are affecting governance.



Saturday, August 27th

7:45 a.m. – 9:00 a.m.

Breakfast
Montalto – Dining Room

9:00 a.m. – 12:00 p.m.

Seminar Session I: The Evolution of Congress: How Did We Get Here?

(Break 10:30 a.m. – 10:45 a.m.)

Board Room

Seminar discussions are based on the following texts and videos:

Origins

- Hamilton / Madison, *The Federalist Papers* “No. 57” and “No. 63”
- Nelson Polsby, *How Congress Evolves*, “Causes of Liberalization” and “Overview of the House” pp. 80-96 and 148-155
- Barbara Sinclair, *Congress Reconsidered*, “The New World of U.S. Senators” 11th edition, pp. 1-4

What Does It Mean to Represent? Mr. Smith versus Charlie Wilson

- “Mr. Smith Goes To Washington” movie clip. 1939
- “Charlie Wilson’s War” movie clip. 2007
- Note: Brief movie clips are shown specifically for discussion purposes around the subject matter of working in Washington and to guide discussion (not for entertainment purposes)

12:00 p.m. – 12:45 p.m.

Working Lunch with Discussion of Seminar Session I
Montalto – Dining Room

Conversation will consider the evolution of Congress and what it means to represent.

12:45 p.m. – 2:45 p.m.

Historical Educational Tour of Monticello

The historical educational tour will focus on the dichotomy between Jefferson’s beliefs of equal rights, personal freedom, and democratic values, and the experience of the enslaved people living on his property. The purpose of the tour is to be reminded



that the founders of America didn't always practice what they preached. We chose to share the enslaved people's experience through a tour rather than text because it allows the participants to connect deeper with the content while being immersed in it.

2:45 p.m. – 5:00 p.m.
(Break 3:30 p.m. -
3:45 p.m.)

Seminar Session II: Congress and Its Governance Challenges
Board Room

Seminar discussions are based on the following texts:

Congressional Incentives and Disincentives

- Matthew Glassman, "Why Congress Doesn't Always Do The Right Thing," *The New York Times*, February 7, 2018

Governance Challenges for Congress

- Molly Reynolds, "Improving congressional capacity to address problems and oversee the executive branch," The Brookings Institution, December 4, 2019
- John Rackey, Lauren Bell, and Kevin Kosar, "House committees are hearing from fewer witnesses. That hurts policy," *The Washington Post*, January 28, 2022
- Josh Huder, "Rest in Peace Congressional Budget Process," Georgetown's Government Affairs Institute (GAI) blog, June 6, 2022

Technology and Changing Norms of Representation

- Grace Gedy, "How Congress Got Dumb on Tech – and How It Can Get Smart Again," *Washington Monthly*, April 7, 2019

Is Congress a Dysfunctional Place to Work?

- Paul Hanges, Frances Lee, Kristina Miller, Jennifer Wessel, "Report on the Organizational Climate of Congress." University of Maryland, October 2019, pp. 9-20 and 46-56
- Amissa Ratliff, Jamie Neikrie, and Michael Beckel, "Why Congress Needs to Invest in Junior Staff," Issue One Report, January 25, 2022
- Maya Kornberg, "The People's Branch," Leg Branch Blog, October 16, 2021
- Brad Korten, "For many Capitol Hill staffers, the trauma of Jan. 6 has never left," Roll Call, January 6, 2022

SOCRATES PROGRAM

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6:00 p.m. – 7:00 p.m.

Fireside Chat & Reception

Montalto Parlor and Dining Room

Discuss why Gayle Jessup White wrote her *Reclamation* and what she views as the biggest issues in American politics today along with her hopes for the future and advise on working in a public service role.

Gayle Jessup White, Public Relations & Community Engagement Officer, The Thomas Jefferson Foundation and author of *Reclamation: Sally Hemings, Thomas Jefferson, and a Descendant's Search for Her Family's Lasting Legacy*
Moderated by **Cordell Carter**

7:00 p.m. – 9:00 p.m.

Dinner with Discussion of Seminar Session II

Dining Room and Conservatory

Conversation will consider the changing environment in Congress and whether or not it is becoming a dysfunctional place to work.

Sunday, August 28th

8:00 a.m. – 9:00 a.m.

Breakfast

Dining Room & Conservatory

9:00 a.m. – 12:00 p.m.

Seminar Session III: Congressional Reform: Ideas and Challenges

(Break 10:30 a.m. – 10:45 a.m.)

Board Room

Seminar discussions are based on the following reform proposals:

Reform Proposals

- Select Committee on the Modernization of Congress, “Recommendations for 116th and 117th Congress”
- “Building and Maintaining a Diverse and Inclusive Congressional Office,” *Representative Democracy*, pp. 13-28
- Molly Reynolds, “What is the Senate filibuster and what would it take to eliminate it?” *The Brookings Institution*, September 9, 2020



- Yuval Levin, "Building a More Civil and Collaborative Culture in Congress: Some Diagnostic and Prescriptive Reflections," American Enterprise Institute, June 17, 2021
- Darrell M. West, "Is it time to restore the US Office of Technology Assessment?" Brookings Institution, February 10, 2021
- "Resolution Fact Sheet," Congressional Workers Union, May 9, 2022

12:00 p.m. – 1:00 p.m.

Working Lunch with Discussion of Seminar III
Conservatory

Conversation will consider Articles 1 and 2 of the Constitution, and how foundations of the U.S. government inform and influence the role of Congress today.

1:00 p.m.

Shuttle departs for Capitol Hill

3:00 p.m.

Shuttle drops off participants

CHRISTOPHER A. COONS, DELAWARE, CHAIRMAN
JAMES LANKFORD, OKLAHOMA, VICE CHAIRMAN

BRIAN SCHATZ, HAWAII
JEANNE SHAHEEN, NEW HAMPSHIRE

JAMES E. RISCH, IDAHO
DEB FISCHER, NEBRASKA

SHANNON HAMILTON KOPPLIN, CHIEF COUNSEL AND STAFF DIRECTOR
WILLIAM B. CABLE, 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

August 16, 2022

Mandar Jadhav
Office of Senator Bill Cassidy
United States Senate
Washington, DC 20510

Dear Mr. Jadhav:

This responds to your recent correspondence requesting approval from the Select Committee on Ethics (the Committee) to accept an invitation you received to travel to the *Emerging Governance Leaders Seminar: Leadership and the Role of Congress*, in Charlottesville, Virginia, on August 26–28, 2022, sponsored by the Aspen Institute Socrates Program, a program of the Aspen Institute (Aspen Institute). Provided that you adhere to the guidance set forth below, it appears that it is permissible for you to accept necessary expenses from the Aspen Institute in connection with this trip.

Background

Based on your communication with the Committee, the background in this matter is as follows.¹ You are employed as a Policy Advisor in the Office of Senator Bill Cassidy. The Aspen Institute invited you to travel to the *Emerging Governance Leaders Seminar: Leadership and the Role of Congress*, in Charlottesville, Virginia, on August 26–28, 2022. The Aspen Institute certified to the Committee that it will pay the necessary expenses² related to the travel and that it is neither a lobbyist, lobbying firm, agent of a foreign principal, or otherwise acting as a representative or agent of a foreign government. The Aspen Institute has also certified that it does not retain or employ a registered lobbyist or agent of a foreign principal and that no registered lobbyist or agent of a foreign principal will accompany you at any point throughout your trip.³

Discussion

Privately-sponsored travel includes any gift of travel and travel-related expenses for travel outside the Senate duty station, including transportation, lodging, food and refreshments, and conference fees and materials, whether paid for directly, reimbursed, or provided directly, from a private individual or entity, in connection with a Member's, officer's, or employee's

¹ If this letter does not correctly recite the facts, contact the Committee immediately.

² 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.

³ The term "any point throughout your trip" has a specific definition. See *id.* at 2.

official Senate duties. Incorporating reforms from the Honest Leadership and Open Government Act of 2007 (HLOGA), Pub. L. 110-81 (2007), Senate Rule 35.2 permits Members, officers, and employees to accept privately-sponsored travel only with the prior written approval of the Committee.

The Committee's approval process is governed by the *Regulations and Guidelines for Privately-Sponsored Travel and Glossary of Terms* (collectively, *Travel Regulations*). The *Travel Regulations* contain detailed requirements regarding who may sponsor travel; time limits for trips; and the type and amount of expenses that can be reimbursed.

Entities that do not retain or employ a lobbyist or foreign agent and all non-profit organizations designated as tax-exempt organizations under § 501(c)(3) of the Internal Revenue Code of 1986, regardless of whether they retain or employ a lobbyist or foreign agent, may sponsor domestic trips for up to three days. The three-day limitation means three 24-hour periods, calculated from the time of arrival in the trip location to the time of departure from the trip location. For such trips, neither lobbyists nor foreign agents may accompany a Senate invitee at any point throughout the trip, other than in a *de minimis* way.⁴ This means that neither lobbyists nor foreign agents may accompany Senate invitees at any point to and from the event, at the event itself, or at the location being visited.⁵

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

Consistent with these standards, Committee precedent, and the Aspen Institute's factual representations, it appears that it is permissible for you to accept necessary expenses from the Aspen Institute in connection with this trip, provided that the actual travel and travel-related expenses conform to the information and materials you provided, and the travel and all required documents are disclosed to the Secretary of the Senate (Office of Public Records).

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 \$415 from that sponsor during a calendar year. However, if a

⁴ The term "*de minimis*" has a specific definition. See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 3.

⁵ See *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel* at 5; see also *Select Committee on Ethics' Regulations and Guidelines for Privately-Sponsored Travel – Glossary of Terms* at 2-3.

⁶ A reporting individual is someone whose salary equals or exceeds 120% of the basic rate of pay for GS-15 (\$135,468 for CY 2022) or is a political fund designee and is required to file Financial Disclosure Reports.

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.

I hope you find this information helpful. If you have any additional questions, please do not hesitate to contact the Committee.

Sincerely,



Shannon Hamilton Kopplin
Chief Counsel and Staff Director

Enclosure: Travel Checklist