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# ADS Chapter 580

## Conference Planning and Attendance

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**Functional Series 500 – Management Services**  
**ADS Chapter 580 – Conference Planning and Attendance**  
POC for ADS 580: See [ADS 501maa, ADS Chapters and Point of Contact List](#)

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## ADS Chapter 580 – Conference Planning and Attendance

### 580.1 OVERVIEW

Effective Date: 02/26/2021

This chapter provides the Agency's policy directives and required procedures that govern conferences funded in whole or in part by USAID, and the attendance of USAID employees at conferences sponsored by others. The purpose of the conference policy is to promote fiscal accountability in planning and decisions regarding conference attendance. This chapter does not apply to the Office of the Inspector General (OIG). OIG conference procedures are found in OIG Policy Directive 6003.

A conference is defined as a seminar, meeting, retreat, symposium, workshop, training activity, or other such event (funded with USAID operating expense or program funds including those hosted by implementing partners). For the purposes of this policy, an employee is defined as a U.S. direct hire, personal services contractor, including Foreign Service Nationals (FSNs) and Third Country Nationals (TCNs), or federal employee detailed to USAID from another government agency. The policy does not apply to the following circumstances:

- Employee participation in external conferences.
- USAID-sponsored conferences when there is no cost to the Agency.
- Conference expenses paid under grants to grantees. The non-grant expenditures associated with a conference (e.g., travel costs for USAID employees) are not excluded if the attendance and funding level meet the criteria in **580.3.1**.
- Routine meetings with partners and meetings among USAID staff when fewer than ten employees will be in travel status (regardless of the number of employees participating), and the costs are under \$100,000.
- Co-creation conferences to facilitate the design of programs or procurements.
- Events funded and scheduled by the Center for Professional Development within the Office of Human Capital and Talent Management.
- A single course presented by an instructor conducted at a U.S. Government training facility (including the Washington Learning Center or other USAID training facilities), a commercial training facility, or other venue if a training facility is not available.
- Travel to attend USAID-sponsored and external events when the purpose of the travel falls under "mission" as defined in the [Federal Travel Regulation, Chapter 301, Appendix C](#). This includes travel to a particular site to perform operational or managerial activities and travel to attend meetings to discuss

USAID programs and operations. This exception would only apply to USAID-sponsored conferences when travel and light refreshments are the only direct costs associated with the event.

While USAID-sponsored events that meet the above criteria are exempt from the approval process outlined in this chapter, the approving officials must ensure fiscal responsibility in planning the events and compliance with all applicable Federal regulations, including the Federal Travel Regulation and the Federal Acquisition Regulation. Documentation must be maintained in accordance with the Agency's records retention guidelines (see [ADS 502, The USAID Records Management Program](#)).

## **580.2 PRIMARY RESPONSIBILITIES**

Effective Date: 08/08/2023

- a. The **Administrator (A/AID)** approves a waiver to fund a single conference with estimated costs in excess of \$500,000.
- b. The **Deputy Administrator** approves expenditures for conferences with estimated costs greater than \$100,000 and up to \$500,000.
- c. **The Deputy Administrator for Policy and Programming (DA-PP) approves conferences below the \$500,000 threshold with programmatic equities.**
- d. The **Bureau, Independent Office, and Mission (B/IO/M) Assistant Administrators and Directors** (1) approve expenditures for conferences with estimated costs of \$100,000 or less; and (2) ensure that B/IO/M representation at conferences is limited to the minimum number of attendees necessary to accomplish the Agency's mission.
- e. The **Assistant Administrator for Management (AA/M)** provides clearance on conferences with estimated costs greater than \$100,000.
- f. The **Chief, Bureau for Management, Office of Management Services, Travel and Transportation Division (M/MS/TTD)** reviews and authorizes Travel Authorizations (TAs) for TDY travel to ensure conformity to laws, governing regulations, and Agency policy directives.
- g. The **Chief, Bureau for Management, Management Services Division (M/MS)** develops and publishes policies and required procedures regarding conference planning and attendance and manages the conference approval process.
- h. The **Office of the Executive Secretary (ES)** coordinates and communicates with B/IOs regarding conference-related Action Memoranda submitted for the approval of the Administrator or Deputy Administrator.

i. The **Bureau and Independent Office Primary Point of Contact for Conferences (B/IO POC)** (1) provides guidance to conference organizers to ensure that conference approval requests comply with the requirements outlined in this ADS chapter; and (2) serves as a clearing official in their respective B/IO for all conference approval packages.

## **580.3 POLICY DIRECTIVES AND REQUIRED PROCEDURES**

### **580.3.1 Justification and Approval of Conference Expenditures**

Effective Date: 08/08/2023

USAID managers must be fiscally responsible in planning conferences and in making decisions regarding conference attendance. Staff attending conferences must have a work-related need to attend, and USAID-funded conferences must be in support of the Agency's mission. Conference expenditures must be justified based on one or more of the following:

- Furthers one of the Agency's core development objectives;
- Contributes to relationships with key constituencies;
- Advances leadership in the development community;
- Responds to Congressional mandates or Federal compliance requirements;
- Provides critical training that is relevant to an employee's work; and/or
- Achieves one or more of the Agency's established priorities (including the Agency's commitment to diversity, equity, inclusion, and accessibility [DEIA], and/or Climate Action Plan).

Managers must make every effort to minimize conference costs, maximize the use of government-owned facilities, and identify opportunities to reduce costs in selecting conference locations and facilities.

Approval is required for the following:

- (a) USAID-sponsored conferences that ten or more USAID employees who will be in travel status are expected to attend, regardless of cost.
- (b) USAID-sponsored conferences where the net conference expenses by USAID will exceed \$100,000 (excluding salary of employees), including those where travel is not involved.

The conference approving officials are as follows:

- The Assistant Administrators, Mission and Independent Office Directors approve expenditures for conferences with estimated costs of \$100,000 or less.
- The Deputy Administrator approves conference expenditures that are greater than \$100,000 up to \$500,000.
- **The Deputy Administrator for Policy and Programming (DA-PP) approves conferences below \$500,000 with programmatic equities.**
- A/AID approves waivers to spend in excess of \$500,000 on a single conference. The Agency is prohibited from incurring expenses greater than \$500,000 on a single conference. A/AID may provide a waiver from this prohibition if they determine that exceptional circumstances exist whereby spending in excess of \$500,000 on a single conference is the most cost-effective option to achieve a compelling purpose.

The above thresholds **do not** include the salary cost attributable to the time employees spend during conferences and while in travel status. However, the approving official will consider both the direct and in-direct (salaries) costs in making decisions regarding the cost effectiveness of conferences.

### **580.3.2 External Conference Attendance**

Effective Date: 02/26/2021

USAID representation at conferences must be limited to the minimum number of attendees necessary to accomplish the Agency's mission (see the [Federal Travel Regulation, Chapter 301, Part 301-74.18](#)). B/IO/Ms must consider travel and other expenses when selecting attendees. USAID employees attending conferences must comply with Federal regulations ([FTR Chapter 301, Part 301-74](#)) and Agency policies on conference-related travel, meals, lodging, and other expenses.

#### **580.3.2.1 Registration Fees**

Effective Date: 04/11/2012

Employees must make every effort to take advantage of early registration discounts. Managers must only approve late registration fees when extenuating circumstances prevented the employee from taking advantage of the regular or early fee. Attendees will be reimbursed for a discounted payment for a conference registration fee when travel to the event has been approved and a proper claim for reimbursement of expenses (voucher) is submitted. In cases where an attendee is unable to attend an event for which a registration fee was paid in advance of the event, the attendee must seek a refund of the registration fee and repay the Agency with any refund received. If no refund is made, the Agency must absorb the advanced payment if the attendee's failure to attend the event was caused either by an Agency decision or for reasons

beyond the employee's control that are acceptable to the Agency, such as an unforeseen illness or emergency. If no refund is made, and the attendee's failure to attend the scheduled event is due to reasons deemed inexcusable by the Agency, the traveler must repay the Agency for the amount advanced.

### **580.3.2.2 Meals and Light Refreshments**

Effective Date: 04/11/2012

When meals or light refreshments are furnished by the sponsoring organization or are included in the registration fee, the applicable meals and incidental expenses (M&IE) must be calculated.

- (a) If meals are furnished, the appropriate deduction from the M&IE rate must be made (see [FTR Chapter 301, Part 301-11.18](#)).
- (b) If light refreshments are furnished, no deduction of the M&IE allowance is required. Light refreshments for morning, afternoon, or evening breaks are defined to include, but are not limited to, coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips, or muffins.

### **580.3.2.3 Conference Lodging**

Effective Date: 04/24/2014

As a general rule, lodging costs should be within the established lodging portion of the *per diem* rate for the locality. In those instances when lodging is not available at the applicable *per diem* rate or the employee is attending an event where lodging must be procured at a pre-arranged place, the employee may be authorized to use the actual expense method. The travel authorization or an amendment must specifically state that the actual expense method is authorized. Actual expenses must be authorized in advance, except in instances where prior approval is not possible. In such cases, actual subsistence expense requests must be submitted to M/MS/TTD no later than 30 days after travel has been completed. Where actual expenses are less than the maximum authorized, only actual expenses are reimbursed.

See [ADS 633, Financial Management Aspects of Temporary Duty \(TDY\) Travel](#) and [ADS 522, Performance of Temporary Duty Travel in the U.S. and Abroad](#).

### **580.3.3 USAID-Sponsored Conferences**

Effective Date: 08/08/2023

USAID B/IO/Ms must plan and approve USAID-funded conferences in accordance with the Federal Travel Regulations ([FTR Chapter 301-74](#)), the [Federal Acquisition Regulation](#), and USAID policies, e.g., ADS 610. When planning a conference, Bureaus/Independent Offices must:

- (a) Assure that there is appropriate management oversight of the conference planning process;
- (b) Document all direct and indirect conference costs (including employee salaries) to be paid by USAID, whether paid directly or reimbursed to travelers or others associated with the conference;
- (c) Invite the minimum number of attendees needed to achieve the goals of the conference, limiting the number of participants to two per Mission unless adequately justified;
- (d) Consider alternatives to a conference, such as videoconferencing and teleconferencing;
- (e) Maximize the use of Government-owned or Government-provided conference facilities as much as possible;
- (f) Identify opportunities to reduce costs in selecting a particular conference location and facility (for example, through the availability of lower rates during the offseason at a site with seasonal rates);
- (g) Keep other costs as low as possible -- use in-house facilitators when feasible, keep food and audiovisual equipment costs to a minimum, limit printing when possible and rely on less costly ways to share information, limit stays in country to the dates needed to attend events and/or consultations; and
- (h) Ensure that the conference planner or designee does not retain for personal use any promotional benefits or materials received from the travel service provider as a result of booking the conference.

See [FTR Chapter 301, Appendix E, Suggested Guidance for Conference Planning](#).

Conferences must be planned at least 12 months in advance. B/IOs must incorporate conference planning into the respective budget cycles to ensure that the conference is considered through the budget process at least 12 months in advance of the planned date of the conference. B/IOs can incorporate conference planning into Operating Year Budget (OYB) or Congressional Budget Justification (CBJ) planning.

Conferences that require approval as outlined in section 580.3.1 must be registered in the eConference Tracking and Approval System (eCTAS). Conference coordinators must request approval through the eCTAS when ten or more USAID employees in travel status are expected to attend or the cost will exceed \$100,000, unless the event meets one of the exceptions outlined in section 580.1. Ideally, approval should be requested at least 120 days in advance of the proposed event, but must be requested no later than 30 days prior to the start date. **Note: The 120 day requirement is not to be**



confused with the 12-month advance planning requirement, which relates to ensuring proper budget planning and alignment with Agency priorities. The approval must be provided before commitments are made or costs are incurred.

The conference coordinator must upload into eCTAS an action memo from the cognizant B/IO/M Assistant Administrators and Directors (see **580.3.4** for additional information on eCTAS). The action memo must be cleared by the B/IO Point of Contact for conferences (B/IO POC) prior to submission.

The action memo must include the following:

- A brief summary of the proposed event that includes how it is aligned with mission-critical priorities, and the anticipated return on investment;
- The total estimated direct costs and the estimated salary of employees during the conference and while in travel status;
- The number of USAID employees attending;
- The number of other USAID-funded participants (e.g., institutional contractors). The cost for these participants should not be included in the direct cost of the conference if they are funded under a negotiated agreement that is not directly in support of the conference;
- The number of other participants (e.g., partners, representatives from other agencies, host government officials);
- Confirmation that alternatives to a conference were considered, e.g., videoconferencing;
- A list of employees attending and a justification for each;
- Clearance from the Mission Director if the event will be held at an overseas location;
- A cost comparison for at least three potential venues (including a U.S. Government owned or leased facility) and a justification if the lowest cost facility is not selected (see **580.3.3.3**);
- A justification for the selected location to include a cost estimate for locations considered (e.g., Washington vs. a field location);
- A line item budget for the total estimated cost of the conference (e.g., travel and *per diem*, venue, facilitators, meals, equipment, printing, access fees, ground transportation);

- A determination that meals provided to local employees are a necessary expense (see **580.3.3.4**); and
- Certification that the proposed costs are comprehensive and represent the greatest cost advantage to the U.S. Government.

If the estimated cost exceeds \$500,000, A/AID must sign a waiver for the Agency to fund the conference. In this case, the action memo must be addressed to A/AID and will serve as the waiver request. The memo must discuss why a single conference is the most cost effective option to achieve a compelling purpose.

For previously approved USAID-sponsored conferences with estimated direct costs of \$100,000 or more, any proposed increase of ten percent or more in the cost must be authorized by the appropriate approving official. The responsible B/IO must submit an action memorandum to the Deputy Director to request the approval. The AA/M must provide clearance prior to submission.

[ADS 580mab, Conference Approval Memo Template for USAID Sponsored Conferences](#) provides a template for the conference action memo and attachments. Conference coordinators must use the template and complete the [Conference Coordinator Checklist](#). Conference coordinators must upload both of these documents in eCTAS. If program funds will pay for all or part of the requested conference, the conference coordinator must send an information copy of the action memo to the Office of Budget and Resource Management (BRM) at BRMTaskerList@usaid.gov.

Prior to approving travel in the E2 Travel System for an employee to attend a USAID-sponsored conference, supervisors must confirm with the conference coordinator that the employee is approved to attend and note the approval in the comment section in E2. Employees must select the Type of Travel for the trip in E2, (e.g., Conference), and ensure that their authorizations reflect the Specific Travel Purpose (e.g., Attending the Annual Technical Officers Workshop).

### **580.3.3.1 Cost Comparisons for the Venue**

Effective Date: 02/26/2021

A conference coordinator seeking a facility for a conference must conduct a cost comparison for a minimum of three potential sites, one of which must be a U.S. Government facility, if available. Competitive quotes are not required if the cost for the venue is below the micro-purchase threshold as long as the cost is considered reasonable (see [ADS 331.3.4](#)). The conference coordinator must make every effort to select a site that is the most advantageous to the U.S. Government. The USAID Washington Learning Center and other USAID facilities should be the venue of first choice when feasible. Cost comparisons must include, but not be limited to, a determination of the adequacy of lodging rooms at the established *per diem* rates, overall convenience of the conference location, fees, availability of meeting space,

equipment and supplies, and the commuting or travel distance of attendees (see [FTR Chapter 301, Part 301-74.4](#)). The selection of conference facilities must also be in compliance with the FAR requirements.

As a part of the cost comparison, B/IO/Ms must use the established *per diem* rate for locations for which costs are compared. There are over 3,000 commercial facilities globally in the program that provide accommodations at or below the published *per diem* rate for the locality. Information on event and meeting spaces in U.S. Government-owned buildings can be obtained at <http://www.gsa.gov/portal/content/104886>.

While it is always desirable to obtain lodging facilities within the established lodging portion of the *per diem* rate for a chosen locality, it may not always be possible. In negotiating lodging rates, the employee may exceed the established lodging portion of the *per diem* rate, if warranted (see [ADS 522.3.17.1](#)). This will provide flexibility in selecting an appropriate property at the most advantageous location. The B/IO/M sponsoring the conference will request approval to exceed the lodging portion of the *per diem* rate for the selected locality in the action memo accompanying the approval request. If approved, the rate must be allowable for all employees authorized to attend the conference.

B/IO/Ms must hold USAID-funded conferences in the United States at an accommodation approved by the Federal Emergency Management Agency (FEMA) within the U.S. Department of Homeland Security. This requirement may only be waived if A/AID makes a written determination on an individual basis that a waiver is necessary in the public interest for a particular event. Conference planners must determine whether a site is an approved accommodation at <http://apps.usfa.fema.gov/hotel/>.

The sponsoring B/IO/M must maintain a record of the cost of each site considered. The B/IO/M must make these records available for the inspection of the Office of the Inspector General or other interested parties.

Additional guidance for planning a conference is available in [FTR Chapter 301, Appendix E, Suggested Guidance for Conference Planning](#).

### **580.3.3.2 Food During USAID-Funded Conferences**

Effective Date: 04/11/2012

The provision of food during USAID funded conferences must be in accordance with [ADS 610, Use of Entertainment Account, Representation Allowances, and Program and Operating Expense Funds for Entertainment](#). The general rule is that USAID may not normally provide meals to USAID employees during conferences that are determined to be training activities unless the attendee is in temporary duty status, or the meal is a necessary expense. Attendees must be away from the official duty station for more than 12 hours and at least 50 miles from both the permanent duty station and home in order to be in temporary duty travel status. Light refreshments for morning, afternoon, or evening breaks may be provided if the training is an all-day

course or there are extenuating circumstances, *e.g.*, a place to buy refreshments is not available. Light refreshments are defined to include, but are not limited to, coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips, or muffins.

In accordance with [5 CFR 410.404](#), an employee's attendance at a conference may be considered a training activity, when:

- (a) The announced purpose of the conference is educational or instructional;
- (b) More than half of the time is scheduled for a planned, organized exchange of information between presenters and audience which meets the definition of training;
- (c) The content of the conference is pertinent to improving individual and/or organizational performance; and
- (d) Development benefits will be derived through the employee's attendance.

The conference coordinator must make a determination that essential training will be conducted during meal(s) provided to local employees. Bureaus and Independent Offices must certify in eCTAS whether or not the conference meets the criteria outlined above and that the provision of meals at the conference is necessary for the employee to obtain the full benefit of the training.

When employees are in temporary duty status and receive meals during a USAID-funded conference, the applicable meals and incidental expenses (M&IE) allowance must be calculated.

- (a) If meals are furnished, the employee must make the appropriate deduction from the M&IE rate (see [FTR Chapter 301, Part 301-11.18](#)).
- (b) If light refreshments are furnished, no deduction of the M&IE allowance is required. Light refreshments for morning, afternoon, or evening breaks are defined to include, but are not limited to, coffee, tea, milk, juice, soft drinks, donuts, bagels, fruit, pretzels, cookies, chips, or muffins.

See [ADS 610, Use of Entertainment Account, Representation Allowances, and Program and Operating Expense Funds for Entertainment](#) for additional information on the expenditure of appropriated funds for meals and refreshments. The Office of General Counsel should be consulted if there are questions regarding the appropriateness of planned expenditures.

### **580.3.3.3 Promotional Materials or Benefits**

Effective Date: 04/11/2012

The conference planner or designee must not retain for personal use any promotional benefits or materials received from a travel service provider as a result of booking a conference. If offered such benefits as a result of their role as a conference planner, they must not retain such benefits for your personal use. They must only accept such benefits on behalf of the Federal Government, and such accepted benefits must only be used for official Government business (see [FTR Chapter 301, Part 301-53.3](#)).

#### **580.3.4 Conference Tracking and Approval System**

Effective Date: 02/26/2021

The eConference Tracking and Approval System (eCTAS) is the corporate application for managing conference activities. Conference coordinators must request approval through the eCTAS when ten or more USAID employees in travel status are expected to attend or the cost will exceed \$100,000, unless the event meets one of the exceptions outlined in section **580.1** (see [ADS 580saa, eConference Tracking and Approval System \(eCTAS\) User Guide](#)).

#### **580.3.5 Reporting Requirement**

Effective Date: 07/06/2012

USAID must report conference expenses on the official website beginning January 31, 2013 and by January 31 of each following year. The report must provide a description of all agency-sponsored conferences from the previous fiscal year where the net expenses were in excess of \$100,000. This description must include the following:

- The total conference expenses incurred by the agency for the conference;
- The location of the conference;
- The date of the conference;
- A brief explanation of how the conference advanced the mission of the Agency;
- The total number of individuals whose travel expenses and/or other expenses were paid for by the Agency; and
- For any instances where the net expenses for an agency-sponsored conference exceeded \$500,000, the report must include A/AID signed waiver that identified the exceptional circumstances that necessitated exceeding this threshold.

### **580.4 MANDATORY REFERENCES**

#### **580.4.1 External Mandatory References**

Effective Date: 08/08/2023

- a. [Federal Acquisition Regulation](#)
- b. [FTR Chapter 301, Part 301-74, Conference Planning](#)
- c. [FTR Chapter 301, Appendix C, Standard Data Elements for Federal Travel](#)
- d. [FTR Chapter 301, Appendix E, Suggested Guidance for Conference Planning](#)
- e. [GSA Bulletin FTR 14-02, Clarification of Agency Reporting Requirements for Conferences](#)
- f. [OMB Memorandum, Amending OMB Memorandum M-12-12, Promoting Efficient Spending to Support Agency Operations \(November 25, 2016\)](#)
- g. [OMB Memorandum, Eliminating Excess Conference Spending and Promoting Efficiency in Government \(September 21, 2011\)](#)
- h. [OMB Memorandum, Promoting Efficient Spending to Support Agency Operations \(May 11, 2012\)](#)

**580.4.2 Internal Mandatory References**

Effective Date: 02/26/2021

- a. [ADS 502, The USAID Records Management Program](#)
- b. [ADS 522, Performance of Temporary Duty Travel in the United States and Abroad](#)
- c. [ADS 580maa, Conference Coordinator Checklist](#)
- d. [ADS 580mab, Conference Approval Memorandum Template USAID Sponsored Conferences](#)
- e. [ADS 610, Use of Entertainment Account, Representation Allowances, and Program and Operating Expense Funds for Entertainment](#)
- f. [ADS 633, Financial Management Aspects of Temporary Duty Travel](#)

**580.5 ADDITIONAL HELP**

Effective Date: 02/26/2021

- a. [ADS 580saa, eConference Tracking and Approval System \(eCTAS\) User Guide](#)

- b. [ADS 580sab, Answers to Frequently Asked Questions on USAID's Conference Policy](#)
- c. [ADS 580sac, Conference Approval Requirements Matrix](#)

**580.6 DEFINITIONS**  
Effective Date: 02/26/2021

See the [ADS Glossary](#) for all ADS terms and definitions.

**Conference**

For the purposes of ADS 580, a seminar, meeting, retreat, symposium, workshop, training activity or other such event funded in whole or in part by USAID. (**Chapter 580**)

**Conference Coordinator**

The person designated by the sponsoring Bureau, Independent Office, or Mission to plan and serve as the point of contact for a conference. (**Chapter 580**)

**Conference Lodging Allowance**

A pre-determined maximum allowance of up to 25 percent greater than the applicable locality portion of the *per diem* rate. (**Chapter 580**)

**Direct Cost**

For the purposes of ADS 580, direct costs include all costs attributable to the event, *e.g.*, travel and *per diem*, audiovisual and other equipment usage, computer and telephone access fees, facilitator fees, room rentals, meals, printing, ground transportation. The direct costs are those that the Agency would not incur if the event is not held. (**Chapter 580**)

**Employee**

For the purposes of ADS 580, a U.S. direct-hire, U.S. personal services contractor, including Foreign Service Nationals and Third Country Nationals or individual detailed from another government agency to USAID. (**Chapter 580**)

**External Conference**

A conference funded or sponsored by entities other than USAID. (**Chapter 580**)

**Indirect Cost**

For the purposes of ADS 580, the indirect cost for conferences is limited to the estimated salaries of employees while attending a conference and in travel status. (**Chapter 580**)

**Net Conference Expenses**

Total conference expenses excluding any fees or revenue received by the Agency through the conference and costs to ensure the safety of attending governmental officials. (**Chapter 580**)

**Temporary Duty (TDY) travel**

Official travel at least 50 miles from both an employee's home and duty station for a period exceeding 12 hours. (**Chapter [522](#) and 580**)

**Training**

A learning activity taking place in the U.S., a third country, or in-country in a setting predominantly intended for teaching or imparting certain knowledge and information to the participants with formally designated instructors or lead persons, learning objectives, and outcomes, conducted full time or intermittently. (**Chapter 580**)

**Venue**

The place where an event is held, such as a hotel or convention center. (**Chapter 580**)

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