OFFICE OF THE GENERAL COUNSEL

ETHICS LAW AND PROGRAM OFFICE

LEVERAGING RESOURCES

LEVERAGING RESOURCES

APPLICABLE LAWS AND POLICIES

The Department of Commerce has the important responsibility of promoting job creation, economic growth, sustainable development, and improved living standards for Americans by promoting U.S. competitiveness in the global marketplace; promoting the use of cutting-edge science and technology; and providing effective management and stewardship of the nation's resources and assets to ensure sustainable economic opportunities.

Annually appropriated funds are at times insufficient to conduct all activities that would help further mission-related programs, initiatives, and objectives. Alternatives to using annual appropriations may be available in certain circumstances; however, such alternatives may carry restrictions or require compliance with Department policies and procedures. This handout provides guidance on various options available to Department officials when leveraging outside resources is considered.

For advice about laws and policies regarding leveraging resources, contact:

- Ethics Law and Program Office – regarding gifts to the agency – ethicsdivision@doc.gov.

- Contract Law Division – procuring goods/services from outside entities – contactcld@doc.gov.

- Federal Assistance Law Division – regarding Federal assistance and grants – 202-482-8035.

- General Law Division – regarding intra- and inter-agency agreements and agreements with non-Federal entities, user fees, intellectual property (copyright, trademark, likeness and profile, speaker releases, creation of new logos), and other fiscal law matters – generallaw@doc.gov or 202-482-5391.

United States Patent and Trademark Office – The Office of the of the Deputy General Counsel for Administration in the Office of the Secretary's Office of the General Counsel and the United States Patent and Trademark Office's (USPTO) Office of the General Counsel share responsibility for advising USPTO employees on some of the topics covered in this summary. Specifically, the Ethics Law and Program Office has responsibility for advising USPTO employees on the applicable ethics laws and regulations, including related to gifts.

GIFTS AND CONTRIBUTIONS

The Department of Commerce and each of its components has legal authority to accept gifts and contributions from non-Federal sources to support an agency program or mission. Restrictions on acceptance exist, however, and certain procedures must be followed, as explained below.

AUTHORITY FOR OPERATING UNITS TO ACCEPT GIFTS

The Department is authorized by statute to accept a gift or bequest of property or cash for the purpose of furthering an agency mission. In addition to the Department's gift authority, some of the Department's bureaus possess more specific authorities that permit the acceptance of contributions to certain programs. For example, the Mutual Education and Cultural Exchange Act (MECEA) authorizes the Bureau of Industry and Security (BIS) and International Trade Administration (ITA) to accept contributions of funds in furtherance of export control and trade promotion activities, and the National Marine Sanctuaries Act authorizes the National Oceanic and Atmospheric Administration (NOAA) to accept gifts in support of the National Marine Sanctuaries Program.

Regardless of the legal authority, the standards set forth below apply to the acceptance of gifts of real property, personal property, or cash.

Standards for Accepting a Gift. Gifts may be accepted by a Department component, provided that:

- The gift furthers an agency program (which generally means that it must be for a purpose for which the agency has authority);
- It is really a gift, meaning it is not a payment in exchange for a benefit; and
- Acceptance would not cause a reasonable person to question the integrity of agency programs, which means that (in most circumstances) the gift is *not* from:
    - an agency[*] contractor or someone bidding on a contract,
    - an agency[*] grantee or a grant applicant,
    - a licensee of the agency[*] or license applicant,
    - a member of an industry sector regulated by the agency, [*] or
    - someone with an interest in a controversial matter before the agency. [*]

[*] "Agency" for purposes of this document is an operating unit, in most cases; however for the Office of the Secretary, it is the Department of Commerce; for NOAA, it is the line office, except that for the Office of Oceanic and Atmospheric Research gifts may be accepted from OAR contractors or grantees in some cases based on the totality of the circumstances; and for travel payments to the National Institute of Standards and Technology (NIST), it is the applicable Laboratory for travel for a Laboratory Programs employee or the applicable program or partnership for travel of an Innovation and Industry Services employee.

OFFICIALS AUTHORIZED TO APPROVE GIFTS

In some cases, acceptance of a gift must be approved by the Secretary or by the Chief Financial Officer and Assistant Secretary for Administration. Otherwise, a gift may be approved by the head of an Operating Unit, a Secretarial Officer, or the individual to whom such authority has been delegated. Department Administrative Order 203-9: Gifts and Bequests establishes the Department of Commerce policy on acceptance of gifts from outside sources.

Approval by the Secretary of Commerce. A gift must be approved by the Secretary of Commerce if the value is $35,000 or more.

Approval by the Chief Financial Officer and Assistant Secretary for Administration. A gift must be approved by the Chief Financial Officer and Assistant Secretary for Administration if:

- The gift is real property (real estate);
- There is a condition that the Department or agency undertake activities or expenditures that are not part of regular Departmental programs;
- There are conditions imposed on the Department or agency regarding deposit, investment, or management of donated funds;
- The gift requires more than incidental expenditures in connection with its administration and use;
- The gift involves unusual conditions or requirements;
- The gift is an in-kind donation or payment for official travel the value of which is $500 or more, greater than that authorized by the Department's Travel Policy Handbook (or Federal Travel Regulations).

SOLICITING GIFTS AND SEEKING SUPPORT FOR AGENCY PROGRAMS

Department officials may contact companies, organizations, and others outside the Federal Government to ask for gifts, contributions, and support (except that solicitations cannot be made for travel expenses of Federal employees; see page 6). Guidelines for a solicitation program are provided below, but a specific plan for soliciting support should be discussed with an attorney in the Ethics Law and Program Office (ethicsdivision@doc.gov) to ensure it is consistent with Department policy.

An agency plan to seek funding or other support from sources outside the Federal Government must be consistent with the following guidelines.

Note that the term "sponsor" is often used to identify a donor, contributor, or other entity that is providing support to a Government event, but it is a term also sometimes used to describe the host or organizer of an event. To avoid any misunderstanding, the term "sponsor" is not used in this summary but can be used to identify contributors or donors in public acknowledgments by an agency.

GUIDELINES FOR SEEKING FUNDS OR OTHER SUPPORT FROM NON-FEDERAL ENTITIES

1. **No Solicitations for Support from Improper Sources of Gifts**. Gifts and contributions cannot be sought from anyone from whom a gift cannot be accepted under the Department's gift policy, such as an agency contractor or grantee or someone with an interest in a controversial matter pending before the agency.

2. **No Preferential Treatment**. Solicitations must be conducted on a non-preferential basis. This means that, because participation in a program as a donor may be considered a benefit, a broad range of members of a particular industry sector or geographic area should be given the opportunity to participate. This can best be ensured by directing solicitations to broad-based groups or a wide range of companies or organizations.
   - **Broad-Based Organizations** – The best means to ensure fairness is to solicit support from groups that represent a broad range of members of an industry sector (e.g. trade associations) or geographic area (e.g. chambers of commerce). Gifts from such sources are unlikely to be perceived as favoring any member of the group. However, if the group represents an industry that is identified with a particular position on a matter pending before the agency in opposition to a position taken by another group, it is best to solicit from both groups.
   - **Solicitations through Broad-Based Organizations** – Solicitations also may be made to individual companies through broad-based groups, in which case the contributions would not be from the organization itself but from the individual members. Agency officials engaged in such a solicitation program would ask the broad-based organization to contact its members on behalf of the agency for contributions or gifts for a particular event or program.
   - **Solicitations to a Wide Range of Members of a Group** – An alternative to soliciting support from a broad-based group or through a broad-based group is to solicit directly from individual companies, firms, organizations, institutions, or other entities. If this method of soliciting contributions and gifts is used, it is important to solicit from a broad range of firms within the industry or geographic area targeted.

3. **No Exclusivity**. Donors cannot be promised exclusivity regarding sponsorship. For example, an agency employee cannot promise a donor that the agency will not accept support from a competing company so that the original donor would be the only donor from its industry sector. If only one sponsor is needed for an event, there should be an objective means for determining the donor if there is more than one prospective donor interested in serving as a sponsor to that event, such as choosing the first to offer or choosing randomly

from a list of those who have offered to pay for the event. If a sponsor for the specific event is solicited, the solicitation must be broad-based.

4. **No Special Benefits to Donors**. Donors cannot be promised any substantive benefits not available to non-donors with regard to either the event or program to which they are donating or with regard to other agency activities.

   Benefits to donors <u>cannot</u> include:
   - Special access to Department officials, such as through a "sponsor's reception" or photo opportunities or individual meetings with Government officials;
   - Special access to information, such as a special briefing on agency programs, although donors may be briefed on plans for the event in question and the uses of the donor's contribution;
   - A role in the event, such as keynote speaker, introducer of a speaker, or presenter of an award; or
   - The opportunity to distribute materials or goods to participants at the event, or other opportunities that may be interpreted as agency endorsement of the goods or services of the donor over those of competing companies.

   Benefits to donors <u>can</u> include:
   - Acknowledgment of the donation by Department officials verbally at the event and on event literature, signs, agency and event websites, and correspondence, including use of a special title, such as "sponsor," "contributor," etc.;
   - Tickets to the event in question, including a greater number of tickets based on level of sponsorship (such as gold, silver, bronze, etc.), if there are different levels of sponsorship; and
   - Preferential seating (such as at a table in the front), although not seating that specifically is intended to provide special access to senior Government officials.

5. **No Coercion**. Gifts must be voluntary, so there should not be multiple communications to the same prospective donor. Only one contact should be made in almost all circumstances.

6. **No Solicitation of Travel Payments**. Funds and in-kind donations for the official travel of a Federal employee to attend a meeting or similar function *cannot* be requested or solicited. [See below for more guidance regarding travel payments from a non-Federal source.]

TRAVEL PAYMENTS FROM A NON-FEDERAL SOURCE

Agencies can accept offers to pay for the travel expenses of agency employees, subject to certain limitations, as explained below.

Travel payments may be in the form of funds or in-kind contributions (such as an airline ticket, hotel room, or meal). The same restrictions apply to travel payments as to other types of gifts – they cannot be accepted from agency grantees, contractors, or licensees in most cases, from a member of an industry sector the agency regulates, or from anyone with an interest in a controversial matter pending before the agency. Some additional rules also apply to travel gifts.

SPECIAL RULES FOR TRAVEL GIFTS

No Solicitation. Agencies cannot ask for funds or in-kind support for the travel of a Federal employee to attend a meeting or similar event, such as a conference.

No First-Class Transportation. Agencies cannot accept an in-kind gift of non-coach class tickets for an employee's travel (unless the employee is authorized under Federal Travel Regulations to use other than coach class accommodations, such as for medical reasons, and the offer is comparable in value to that offered to or purchased by other similarly situated meeting attendees).

Reimbursements or Cash Payments. Employees may never receive cash (or cash equivalent) directly from a donor. If travel payments are provided in the form of funds or reimbursements, they must be paid directly to the agency, typically as a check to the U.S. Treasury. Employees may accept an in-kind offer directly.

REPORTING REQUIREMENTS FOR ALL GIFTS

All gifts to an agency must be reported on a form CD 210 – Record of Gift or Bequest.

In addition, any payment of travel expenses from a non-Federal source in excess of $250 to attend a meeting or similar function must also be reported on a form OGE 1353—Semiannual Report of Payments Accepted from a Non-Federal Source.

Invitations and gifts accepted by employees in their personal capacity (see page 9) are required to be reported on the employee's next annual financial disclosure report (i.e., OGE Form 450 or OGE Form 278) if they are a financial disclosure filer and certain reporting thresholds are met.

These forms are available on the Ethics Law and Program Office webpage: https://www.commerce.gov/ogc/about-ogc/bureaus-and-offices/office-assistant-general-counsel-ethics-law-and-programs-office/forms.

CONDUCTING ACTIVITIES WITH OUTSIDE PARTIES

In addition to gifts, the Department and its bureaus are authorized to conduct many types of activities with outside parties, including other Federal agencies, state and local governments, universities, non-profit organizations, and for-profit entities (in limited circumstances) leveraging the resources of outside parties in furtherance of the Department's mission.

When the parties conduct substantive activities or transfer funds, however, the relationships must be preserved through written agreements that capture the roles of the parties, details of the work to be undertaken, the authority to undertake the work, and the authority to receive funds or transfer funds out (if payment is involved). The Department possesses numerous authorities that facilitate activities with outside parties, and, in many cases, the Department's bureaus possess their own specific statutory authorities that permit collaborations specific to their projects. A sample of such authorities includes:

Joint Project Authority (JPA) – The JPA facilitates collaborations between the Department or its bureaus and *non-profit or public organizations* on matters of *mutual interest*, where the *costs of the project are equitably shared*. Projects must be *essential* to the furtherance of the Department's mission and must be *unable to be accomplished* at all or as effectively without the participation of their partners.

Joint Statistical Project Authority – Census's organic statute permits it to engage in joint statistical projects with *non-profit or public organizations* on matters of *mutual interest,* where the *costs of the project are equitably shared*. Projects must be *essential* to the furtherance of the Department's mission and must be *unable to be accomplished* at all or as effectively without the participation of their partners.

Mutual Education and Cultural Exchange Act (MECEA) – MECEA authorizes ITA and BIS to accept contributions of funds or services from any person or organization for the purposes of furthering their respective missions.

Coast and Geodetic Survey Act/Fish and Wildlife Coordination Act – Generally may be used by any NOAA line office to which the authority has been delegated and permits NOAA to work with any individual or entity in furtherance of activities authorized by the Acts.

Please contact the General Law Division for guidance on crafting an agreement. General guidance and agreement templates may be found at https://www.commerce.gov/ogc/about-ogc/offices/general-law-division-genlaw.

PRIVATE SECTOR EVENTS HELD COLLATERAL TO AN AGENCY EVENT

There are occasions in which an agency event would be enhanced by activities for which the agency lacks either funds or legal authority. In such situations, events may be held in conjunction with the agency event but hosted by an outside party (such as the private sector or state or local government). For example, it is not unusual for a third-party entity to host a reception for persons attending a Federal Government conference. Agency officials may coordinate arrangements with the hosts of the third-party event if it would further an agency goal.

SUPPORT FOR COLLATERAL EVENTS

Agency officials may give support to a non-official event held to complement an official agency event if they determine that it would further a Federal Government purpose. These third-party events supportive of an agency event are referred to here as "collateral events." This is not a legal term; it is used here to describe any event that is held separate from, but complementary to, an official Federal Government event. For example, a collateral event could be a reception held after a Federal Government conference to which conference attendees are invited; an entertainment event, such as a concert, organized on the weekend following a Federal Government-hosted summit; or a dinner held the day before an agency seminar for those speaking at the seminar. The key differences between official events and collateral events are that collateral events are not hosted or organized by the Federal Government, are not part of the agenda or program of an agency conference or event and are not subject to restrictions that apply to Federal events.

Agency Support – Ways for an agency to support a collateral event include:

- Publicizing the collateral event by distributing information about it at the official conference, such as through handouts or announcements (but not by listing the collateral event as part of the conference agenda or program or other means that give the impression that the collateral event is part of the agency conference);
- Providing input to the collateral event host on invitees to the collateral event, such as the list of people attending the official conference (although it is important that protected nonpublic information not be provided to the host of a collateral event);
- Coordinating with the host of a collateral event regarding the time and location of events to avoid scheduling conflicts or logistical problems with the official conference or other collateral events;
- Providing suggestions on the type of event that might be particularly appropriate held in conjunction with the official program, such as a breakfast or reception; and
- Agreeing to have a Federal Government official speak at the collateral event, if doing so would be consistent with the agency's mission and would not indicate preferential

treatment for the collateral event host; such an appearance problem is less likely if the host is an association rather than a private company.

AGENCY OFFICIALS ATTENDING COLLATERAL EVENTS

Agency officials who attend collateral events must ensure that they are in compliance with ethics regulations regarding gifts, if the event includes food, beverages, or entertainment.

Ethics Rules regarding Attending Non-Federal Events – Under ethics regulations, a Federal employee may attend a collateral event if:

- The employee is speaking on behalf of the agency at the event;
- The event is a meal while the employee is on travel, and the agency has accepted the meal as a non-Federal travel payment to the agency (in which case the employee's *per diem* is reduced) (see above for rules on travel payments from a non-Federal source);
- The value is $20 or less;
- The event was determined by the Ethics Law and Program office to be "widely attended gathering" and the employee's supervisor has approved the employee's attendance in writing because it will advance an agency interest;
- The event is taking place outside the United States, persons other than United States citizens will be present, and the value is less than the *per diem* for the city, and attendance is part of the employee's official duties; or
- The employee reimburses the host for the fair market value of the event.

Soliciting an Invitation – Agency officials cannot ask to be invited to an event, even if it would meet the above criteria. Ethics regulations do not allow Department employees to solicit personal gifts from anyone with interests in matters before Commerce or if the invitation is related to their Federal Government position.

Consultation with an Ethics Official – Agency officials must consult with an ethics counselor prior to accepting free attendance at a collateral event if attending as a "widely attended gathering" and are strongly encouraged to consult with an ethics counselor in all cases. Contact ethicsdivision@doc.gov.

Note that an alternative to agency support for a collateral event hosted by a private-sector entity is for the agency to ask an outside source to provide funds or in-kind donations for an activity that could be incorporated into the official event. This option is explained above in the section on Gifts and Contributions.

AGENCY SUPPORT FOR OTHER NON-FEDERAL EVENTS

The Department can provide support to other non-Federal events (events held by a private company, nonprofit organization, or state, local, foreign, or international government) to the extent authorized by statute and for which funds are available. The most common means for such support is for an agency to provide a speaker at a non-Federal event.

TRAVEL PAYMENTS FROM A NON-FEDERAL SOURCE

When an agency provides a speaker to an event there are often travel expenses incurred; regulations place limits on circumstances under which an agency can accept payment of travel expenses offered by a non-Federal source.

Travel Payments for Employees Speaking at or Attending an Event. Agency officials cannot ask the non-Federal host of an event to pay the travel costs for agency employees invited to speak at or attend the event; this is because travel payments cannot be solicited. However, if offered, travel gifts can be accepted (unless offered by an agency contractor, grantee, or licensee or member of a regulated industry), either as funds to pay for costs to be incurred, reimbursements for costs incurred, or in-kind gifts (an airline ticket, hotel room, use of a vehicle, meal, etc.). Non-coach class transportation cannot be accepted (unless authorized under Federal Travel Regulations). (See above for information on travel payments from a non-Federal source.)

Events at Which Employees are Speaking. An employee who is speaking at an event in an official capacity can accept a waiver of registration fees and any food, beverages, meals, and entertainment that is offered at the event on the day he or she is speaking that is available to others attending the event. The waiver of registration fees and meals at the event are not considered personal gifts to the employee or gifts to the agency. Therefore, the employee need not obtain approval from a supervisor (as required for widely attended gatherings); also, restrictions on gifts to an agency do not apply. However, if an employee attends a multi-day conference on a day that he or she is not speaking, the agency must pay the full registration fee charged to attend the conference or may, if offered, accept waiver of the registration fee as a gift to the agency or as a widely-attended gathering (if acceptable under agency gift regulations and policies as described above).

HONORARIA AND SPEAKING FEES

Honoraria and speaking fees cannot be accepted in connection with giving an official speech or talk or otherwise engaging in an event in an official capacity. If funds are offered as a speaking fee or honorarium, the offer must be turned down. However, funds offered to pay for or reimburse travel expenses can be accepted by the agency so long as the source of the gift does not present a problem as described above.

APPEARANCE CONCERNS REGARDING FAVORITISM OR ENDORSEMENT

Before agreeing to participate in any event or accept any gift, agency officials should consider whether participation will serve an agency purpose and whether there are likely to be appearances of impropriety. The latter may be present if the event is held by an individual company and those invited are limited to (or are primarily) customers or clients (or prospective customers or clients). Participation in such an event, particularly by a senior official, may create an appearance of endorsement of the company or its products or services or that the company has a special relationship with or access to agency officials. Participation in such an event may still be warranted based on the importance of disseminating information at the event or for other programmatic reasons, but the appearance issue must be considered. Discussion with an attorney in the Ethics Law and Program Office (ethicsdivision@doc.gov) is advised.

NO-COST CONTRACTS AND FEES FOR CONVENIENCE SERVICES

NO-COST CONTRACTS

A "no-cost contract" is a formal arrangement between the Government and a contractor under which the Government has no financial liability to the contractor and the contractor has no expectation of payment from the Government.

<u>Example 1: No-Cost Contract for an Event</u>

Under a typical no-cost contract, where the contractor plans an entire event, the contractor provides a service but instead of receiving compensation from the agency, the contractor charges and retains fees assessed against third parties for its services.[2] However, because an agency cannot do via contract what it cannot otherwise do itself, an agency may not award a no-cost contract that authorizes the contractor to collect and retain fees as reimbursement for expenses that the agency would not otherwise be able to collect a fee for itself.

The Federal Government must have specific statutory authority to retain fees from outside sources.[3] There is no Department-wide authority to retain fees, though as discussed above, individual bureaus may have specific authorities which authorize them to retain fees: e.g., MECEA, and for NIST, section 202 of the American Innovation and Competitiveness Act, 15 U.S.C. § 272(c)(19)-(21).

Given this, the use of no-cost contracts is limited to those agencies with fee authority.

<u>Example 2: A No-Cost Contract Line Item for a Convenience Service</u>

An otherwise typical contract to organize a Federal conference may include a discrete, no-cost line item, which authorizes the contractor to offer conference attendees *optional* convenience services (e.g., refreshments, meals, hotel rooms) in exchange for a convenience fee that the attendee would pay to the contractor directly. The convenience fee in this case is not an

[2] A no-cost contract must be competed in accordance with the Federal Acquisition Regulation unless a sole-source justification relying on one of the Competition in Contracting Act exceptions to full and open competition is prepared. Certain revisions to or deviations from standard provisions and clauses may be appropriate. Please contact the Contract Law Division for further guidance.

[3] To the extent that we do charge an attendance fee without statutory authority, the fee would be considered a user fee under 31 U.S.C. § 9701 and would have to be deposited into the General Fund of the Treasury pursuant to the Miscellaneous Receipts Act rather than the agency's account. 31 U.S.C. § 3302(b).

attendance fee, but rather an optional expense the attendee is voluntarily paying to obtain services that are not part of the conference. As such, the fees are not received "for the Government" but rather collected by the contractor for its own use.

Please contact the Contract Law and General Law Divisions for further guidance on these arrangements or versions thereof.

FEDERAL ASSISTANCE

GRANTS AND COOPERATIVE AGREEMENTS

Grants and cooperative agreements are two common forms of Federal assistance provided by the Department. A grant is a transfer of money, property, services, or anything of value to a recipient when the principal purpose of the relationship is to accomplish a public purpose of support or stimulation authorized by Federal law. A cooperative agreement exists when the awarding agency transfers money, property, services, or something else of value to a recipient to carry out a public purpose of support or stipulation and the agency expects to have substantial involvement in carrying out the contemplated activity. For example, if an agency has authority to support an entity that is carrying out an activity such as hosting a conference, substantial involvement might include identifying agendas items and topics for discussion and panel members. In contrast, an agency *may not* use a cooperative agreement to procure assistance to organize or host a conference.

Requirements for a Grant or Cooperative Agreement. Although property, services, or other things of value may be transferred by the granting agency to a recipient in addition to, or in lieu of, money under a grant or cooperative agreement relationship, these arrangements are subject to several limitations.

The Department cannot award a grant or cooperative agreement unless Congress provides authority through legislation and funding to support the authorized activity. In other words, specific statutory authorization must exist, and any necessary funding must be available before Federal assistance can be awarded. Also, as a general rule, grants and cooperative agreements are awarded pursuant to a competitive process that involves solicitation of applications, an evaluation, and a merit-based selection process. There are limited exceptions that allow for a noncompetitive award (e.g. Only One Source Identified, Unusual and Compelling Urgency, Public Interest). Use of these exceptions, however, requires prior administrative approval by a grants officer and legal clearance.

Questions about whether statutory authority exists for an agency to award a grant or cooperative agreement may be directed to the Federal Assistance Law Division (FALD) at 202-482-8035.

OTHER RESOURCES-RELATED ISSUES

Questions regarding the issues raised in this handout or other issues concerning the use of resources or working with entities outside of the Department should be addressed to the appropriate legal office.

United States Patent and Trademark Office: USPTO employees should contact the USPTO Office of the General Counsel for advice regarding these issues.

All Other Bureaus:

- Charging a fee in exchange for services provided
  General Law Division – generallaw@doc.gov or 202-482-5391
- Charging a fee for entrance into or to participate in an official event
  General Law Division – generallaw@doc.gov or 202-482-5391
- Purchasing food or trinkets for an event
  General Law Division – generallaw@doc.gov or 202-482-5391
- Intellectual property issues, e.g., copyright releases; use of logos; likeness and profile
  General Law Division – generallaw@doc.gov or 202-482-5391
- Cost sharing arrangements between the Department and other Federal agencies
  General Law Division – generallaw@doc.gov or 202-482-5391
- Contracting for goods or services with outside entities, including no-cost contracts
  Contract Law Division – contactcld@doc.gov
- Providing grant funds or other financial assistance to non-Federal entities
  Financial Assistance Law Division – 202-482-8035.

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