



UNITED STATES DEPARTMENT OF COMMERCE  
Office of the Assistant General Counsel for  
Administration and Transactions  
Washington, D.C. 20230

August 23, 2018

MEMORANDUM FOR: Catrina D. Purvis  
Director, Office of Privacy and Open Government  
Office of the Secretary

FROM: Michelle O. McClelland  
Assistant General Counsel  
for Administration and Transactions

SUBJECT: Clearance of DAO 202-739

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ou=Department of Commerce, ou=Office  
of the Secretary, cn=JAMES KORNEGAY,  
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This provides clearance for the attached revised Department Administrative Order (DAO) 202-739, *Gifts and Decorations from Foreign Governments and to Foreign Individuals*. The DAO updates the current DAO dated December 21, 2004.

During our review, the Office of Financial Management (OFM), the office of primary interest for this DAO, was informed that there is no statutory or regulatory requirement for reporting gifts of minimal value or decorations authorized to be retained. Nonetheless, pursuant to the current and this revised DAO, OFM requires reporting for all gifts and decorations.<sup>1</sup> Given that the reporting of gifts of minimal value and of decorations authorized to be retained is not required, the Chief Financial Officer and Assistant Secretary for Administration should consider if mandating such reporting is necessary due to additional burdens placed upon the International Trade Administration and others who have frequent Department-related interactions with foreign governments and individuals.

If you have any questions, please contact me at 202-482-5387.

Attachment

<sup>1</sup> OFM noted that it requires reporting of all gifts in order to verify if they are over or under the minimal value and that it requires the reporting of all decorations in order to maintain accountability and to minimize the possibility of misuse by employees including receipt of same in exchange for favors. Sections 3.02.a and 6 of the DAO provide direction on determining the value of gifts and decorations.