Subject line: How to avoid potential conflicts when playing in the NRECA GGGT

Dear golfers,

We recently became aware that FEMA is taking a more narrow interpretation of the federal gift rules that apply when non-federal entities, like electric cooperatives, receive federal grant funds. This narrower interpretation may have an impact on your foursome at the NRECA Good Government Golf Tournament.  In an abundance of caution, we are sending you this information.

If your cooperative is currently the recipient of FEMA funding, or if you are planning to apply for FEMA funding, then the federal gift rules prohibit you from soliciting or accepting certain types of gifts from current or potential vendors whom you may hire to perform the work covered by the FEMA reimbursement. This includes your participation (i.e. your round of golf) at our upcoming tournament, if you are subject to the rules.

If your cooperative is currently receiving, or plans to apply for, FEMA funding, and if you believe you may have solicited or accepted a tournament sponsorship from a current or potential vendor whom you may hire to perform the work covered by the FEMA funding, please notify Mike Whelan immediately and he will place you in a new foursome. Mike’s contact information is below. If you are uncertain whether the rules apply to you, please contact your cooperative attorney.

NRECA’s legal and regulatory team has reviewed the rules and we are confident that everyone can accept the gift bag, the lunch, attend the reception, and compete for the various golf prizes, which are provided by NRECA with the support of the tournament’s sponsors.

NRECA’s legal team is also working on additional guidance for cooperatives and their attorneys to help you better understand the gift rules and other requirements related to FEMA funding (and potentially other federal awards or grants). You can expect to hear more from NRECA on this topic in the near future.

Please feel free to contact me or any of the NRECA staff listed below.

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