

Questions and Answers

1. Will we have to compete for positions in the new appraisal division in DOI?

At this time there is no plan to have appraisers compete for their own position in the new organization. Appraisers will be transferred, at their current grade, to the new organization using their current position descriptions. After these transfers occur, if there are vacant positions in the new organization, it may be necessary to announce vacancies so that current Appraisers can be considered competitively for promotion opportunities.

2. Will the career ladder we are currently using be affected by the changes?

The career ladders currently used for Appraisers are likely to change in the new organization. Because we are consolidating Appraisers into one organization, the career ladders should be clearer and better defined. Previous career ladders in related positions that are ultimately transferred to the new organization (e.g., some Realty Specialists) may no longer be applicable. However, the career ladder situation will take time to resolve as the new organization is established, supervisory and management positions are identified, and geographic structures are determined.

3. Will the new staff and supervision structure be in place by Oct. 1, 2003?

The current plan is to have an Acting Chief Appraiser in place and current appraisers transferred to the new organization early in the Fiscal Year. This will be accomplished on paper only, with no office space movement of employees at this time.

4. How many staff within the various agencies of the DOI are affected by this reform?

There are currently approximately 100 Appraisers in the Department (not including the Office of the Special Trustee Appraisers). There are also a small number of other employees with Appraisal duties (some Realty Specialists).

5. What will happen to our administrative support staff and Outstanding Scholar Program students?

Positions (administrative, students, etc.) that provide support to the appraisal process are being identified for possible movement to the new organization, along with positions in other than the GS-1171 (Appraiser) occupational series that perform appraisal work on less than a full-time basis (e.g., some Realty Specialist positions). While money for these positions will be ultimately moved to the new organization, it is not anticipated that many, if any, employees will be asked to consider a move to the new organization. Such employees will be able to volunteer for movement to the new organization, if there are vacancies for which they qualify.

6. Who will sign our time sheets, travel vouchers, performance appraisals. Will we fax them to the Regional Appraiser or will there be someone on site to do this?

The National Business Center will distribute guidance on this issue prior to the transfer. For the time being, current practices will apply. Performance appraisals for FY 2003 will be completed by current supervisors.

7. Will government buy-outs be used rather than forcing employees to move to other locations if they are close to qualifying for retirement?

Because we do not anticipate eliminating positions or moving employees, at this time, the use of buy-outs are not anticipated. Early-out authority, may be used, however, for those employees close to retirement that do not want to move to the new organization. A decision on requesting early-out authority will be made after we know the new geographic structure.

8. Will appraisers remain employees of the agencies that presently employ them, or will they all become DOI employees?

Appraisers will become employees of the Department's National Business Center.

9. What criteria will be used to determine which field offices will remain in operation and/or how will the location of offices be determined?

A number of criteria have been considered to determine which cities should be candidates for Regional offices of the new Appraisal organization. These criteria include: 1) Continued close face-to-face cooperation with the bureau realty offices; 2) as much as possible, centered where appraisers are currently located; 3) where feasible, co-located with NBC; 4) located in cities that offer reasonable air transportation access; and 5) dispersed geographically to cover all areas of the United States; 6) other things being equal, co-located with regional offices for other agencies engaged in similar work (e.g., Forest Service). Based on these criteria, a number of cities are being considered.

In addition to Regional offices, appraisers will be located in field offices. Any change in the current distribution of field offices would likely occur over a phased-in timeline once the current workload is more clearly understood.

10. How much will this reform ultimately cost the taxpayers?

While the exact cost of this reorganization is not known, the Department anticipates significant cost savings in the long-run. It is expected that consolidation and co-location will deliver some cost savings by taking advantage of certain economies of scale in day-to-day operations. Further, the improved process aims to ensure accurate appraisals and prevent inappropriate transactions that can impose significant costs on the United States and all Federal taxpayers.

11. Where will the funding come from to relocate staff and offices?

The Department does not anticipate relocation of staff or offices upon establishment of the new office. However, the Department ultimately expects some level of consolidation amongst offices within commuting distance of each other once the new organization is operational. It is

anticipated that the timing and extent of such consolidation decisions will be made by the new Chief Appraiser, in consultation with the NBC, once he or she is selected. These expenses are not expected to be significant, and the Department will work with bureaus to address them. Although office consolidation will impose additional one time costs, it should yield some offsetting savings over the long term.

12. How will regional chiefs be determined for the NEW organization?

We cannot give you a precise answer as to how regional appraisers will be selected. However, we expect the process to be open, competitive and rigorous. It will be very important for the new organization to put its best foot forward. This includes making certain the management team is highly capable and up to the task of implementing a quality operation. The selection of the respective regional appraisers on a permanent basis is not likely to occur for some time, since it is expected that the position of chief appraiser in the DOI organization will at first be occupied by an individual in an "acting" capacity.

13. Will the appraisal staff be physically separated from their former agencies?

Once the new organization is established, appraisal staff report to the Department's National Business Center. Initially there will be no office relocations, hence staff will not be physically separated from their former agencies. However, the Department anticipates some level of office consolidation once the new organization is operational. It is likely that appraisal staff within commuting distance will be consolidated into a single office and co-located with existing National Business Center offices, existing Bureau offices, or other agencies engaged in similar work. Final decisions on the location and timing of such localized consolidation will be determined by the new Chief Appraiser. Additional relocation of staff (beyond commuting distance) is not anticipated for several years.

14. Why can't the appraisal staff remain part of the agency where they presently work, but be located in a separate autonomous appraisal branch within the agency?

This reform action is in response to long-standing concerns about the management of appraisal functions as documented for several decades in reports issued by Interior's Inspector General, the General Accounting Office and, more recently, by the Appraisal Foundation and an interagency team under the auspices of Interior's Bureau of Land Management. As noted by the Secretary, "These problems require fundamental reform. In the past, the department tried to resolve them by issuing new directives. Those efforts have not succeeded because they did not address the basic issue of appraiser independence. Our new organization will change the new way we do business and will gain the respect of both the public and the dedicated professionals in our appraisal and realty programs."

15. As many appraisers will continue to be co-located with other federal agencies/personnel (who are not appraisers), how will they be segregated from influence by management (and other personnel) on appraisal issues (i.e., land values, highest and best use, sales used in appraisals, etc.)? Several appraisers are co-located with other federal employees who have an opportunity to try and influence the appraiser as far as value,

determination of highest and best use, etc. Are there plans to "remove" these employees from their current physical locations and put them in a separate office so there is no opportunity for influence (harassment, etc.)?

The operational logistics of this reform require a phased timeline. The new reporting structure will provide means by which to assure appraiser independence. Under this structure, appraisers will report to supervisors who also are appraisers and thus familiar with recognized professional standards. Once the new organization is fully operational, the new Chief Appraiser will consider other steps to further insulate appraisal staff from inappropriate pressures. Office consolidation will be considered on a case-by-case basis.

16. How will this reform help to accomplish the work of the affected agencies? Not improve quality of work or confidence of the public, but help to accomplish the work of the affected agencies?

The Department views the goals cited in the question as interrelated. Improving the quality of appraisal work and assuring public confidence in the appraisal process will help staff accomplish the work of the affected agencies.

Additionally, assuring that appraisals meet recognized standards and improving efficiencies will result in a better use of fiscal resources, thus further assisting Bureaus in accomplishing their respective missions.

17. Will there be a distinction made between being state-certified and state-licensed?

Yes. The Appraisal Foundation recognizes these different levels of qualifications. The appraisal organization will require an appraiser to be generally certified to be a GS-12 or above. (See also question #20.)

18. Will funding be available to pay for the appraisal certification renewal in the new appraisal organization?

This issue is under consideration. The Appraisal Reform Implementation Team is researching current authorities, relevant policy in other agencies, and comparable situations within the Department (e.g., bar association dues for attorneys) for guidance. This issue also has a budgetary component that must be thoroughly researched before a final determination is made.

19. There are three National Appraisal Organizations that were founding members of the Appraisal Foundation, they are, the Appraisal Institute, the Society of Farm Managers and Rural Appraisers, and the American Society of Appraisers. My question is, will a designation from any of these organizations hold the same weight?

To be promoted or hired at the GS-13 level or above, it will be necessary to have a credible professional designation by a sponsoring member of the Appraisal Foundation, requiring successful completion of a comprehensive examination, documented experience and rigorous training. The Chief Appraiser shall determine those designations which qualify.

20. If there is a deadline to become state-certified for GS-12's and above, will there also be a deadline for GS-13's and above to obtain their professional designation while they are under the "grandfather clause?"

To be promoted or hired to the GS-12 level or above, a state general appraisal certification is necessary. Current employees at these levels who are currently not state certified must complete certification by 1/1/07. However, all appraisal reports and appraisal reviews must be signed or co-signed by a state certified general appraiser after July 1, 2004 unless a temporary waiver is issued to an individual by the (acting) DOI Chief Appraiser.

To be promoted or hired to the GS-13 level or above, it is necessary to have a credible professional designation (see also question #2). Current employees at the GS-13 level or above who do not have a professional designation will not be required to obtain a designation.

21. Who will perform the appraisal review functions, the agencies or DOI?

The new appraisal organization within the Department's National Business Center will perform appraisal review functions.

22. In an office with four or more appraisers who decides what work will be assigned? In other words who decides which one will contract appraisals, or who will review appraisals or who will actually write appraisals? Will we all be expected to do all three avenues of appraising?

In the short term, most day-to-day duties of appraisers will continue without significant change, except that assignments will be made through the new organization. The DOI Chief Appraiser will evaluate options for shifts in responsibilities once the current workload is more clearly understood.

23. Is the new office going to shift towards more contract work? If so, to become state-certified, you need appraisal experience (review appraisal work does not full fill state requirements). How will this be this apparent inconsistency be addressed?

The DOI Chief Appraiser will evaluate options for shifts in responsibilities and the appropriateness of additional contracting once the current workload is more clearly understood. Certification requirements will be a consideration in determining workloads.

24. Will you force appraisers who are close to retirement to relocate, or let them stay in their current locations even though they may be a distance away from an airport?

The Department does not anticipate relocation of staff or offices upon establishment of the new office. However, the Department ultimately expects some level of consolidation amongst offices within commuting distance of each other once the new organization is operational. The timing and extent of such consolidation decisions will be made by the new Chief Appraiser, in

consultation with the NBC, once he or she is selected. Concerns of employees who are close to retirement will be considered in relocation decisions.

Although the Department wants to retain as much institutional knowledge as possible, early-out authority may be an option for employees who do not want to move to the new organization. A decision on requesting early-out authority will not be made after the new geographic structure is determined and other organizational issues are assessed.

25. Will agency program needs for appraisals be considered when determining where groups of appraisers will be located?

See question #9

26. Why are all the appraisers within DOI being put through this reform, when it is not clear that the problem is Department-wide?

In fact, concerns such as appraiser independence apply to all DOI Bureaus now performing appraisal functions. This requires a new structure for performing appraisal functions.

27. After the appraisal reform is complete, will DOI make changes to accommodate specific agency needs, if it is obvious that the reform has made it impossible for the agency to complete program missions?

It is anticipated that the Chief Appraiser will perform periodic reviews of the new organization. Should these reviews reveal any unmet customer needs, the Chief Appraiser will act to remedy the situation.