

**FAIR ACT CLASSIFICATION**  
**Managing for Excellence**  
**Action Item No. 10**

**EXECUTIVE SUMMARY**

The primary objective of this report on Action Item No. 10 is to present the approach, findings, and recommendations of the Bureau of Reclamation's (Reclamation) *Managing for Excellence* (M4E) team that was tasked to accomplish Action Item No.10. The text of this action item provided the general framework for completing this task. Action Item No. 10 is included in the Engineering and Design Services (E&DS) functional area of the M4E Action Plan and specifically states:

*“Evaluate the identified workload in terms of its commercial, commercial core, and/or inherently governmental nature, in accordance with the definitions in OMB Circular A-76. This will include the critical determination of the sustainable core capability needed to achieve Reclamation’s mission-critical work.”*

The objective of the analysis is to provide Office of Management and Budget (OMB) Circular No. A-76 (Circular A-76) Federal Activities Inventory Reform (FAIR) Act classification guidance to be used to assist with M4E initiatives to develop proposals for efficiently and effectively obtaining the technical services needed to carry out Reclamation’s mission objectives. Workload expressed in terms of dollars spent for various broad categories of functions did not provide the necessary detail to apply Circular A-76 classification; therefore, Reclamation’s Fiscal Year 2006 (FY06) FAIR Act Inventory (Inventory) and justifications were used.

Reclamation has made great progress in its Inventory of inherently Governmental (IG), commercial and commercial core (CA) activities. However, the review of the Inventory identified areas for improvement. The findings of the Action Item No. 10 team can be summarized as:

- FAIR Act Inventory data and guidance will provide data to assist with identifying and defining inherently Governmental and commercial core activities as well as ensure compliance with Circular A-76 in the rightsizing effort.
- The percentage of inherently Governmental FTEs may be low in the subset of technical services Reclamation wide.
- Justification language did not always support Inventory classification both at the template and FTE level.
- Guidance was not clear and concise in some areas leading to inconsistencies in coding and insufficient justification narratives.

- Improvements to the Inventory data and process can and should be made. Upon further review, adding work examples to assist with future organization alignment reviews and/or pre-study activities to the database is not recommended.
- The review of classifications and justification language provided additional detailed data that indicates the scope of activities performed by the Reclamation-wide technical resource occupations defined by Action Item No. 9 may extend beyond E&DS workload and some activities may be missing from the review. Further, it includes operation and maintenance functions that should be separated for follow-on actions (e.g., Action Items No. 11, 12, 26 and 27).

## **APPROACH**

Action Item Team No. 10 (Team 10), with assistance from an independent consultant, used Reclamation's Inventory and supporting data to review and evaluate the classifications of work in terms of its commercial, CA, and/or IG nature in accordance with the definitions in Circular A-76 and the Department of the Interior (DOI) and Reclamation Guidance. DOI's review of Reclamation's Inventory and related comments were utilized as well. The Inventory is the closest, existing dataset to activity definitions. It was developed at the lowest organizational level in the past year. This dataset provides a mechanism for identifying IG and CA activities and the classification guidance to support an organizational review and right-sizing process. In addition, it provides comprehensive data to assist with appropriately identifying activities that should be included or excluded from the E&DS right-sizing process.

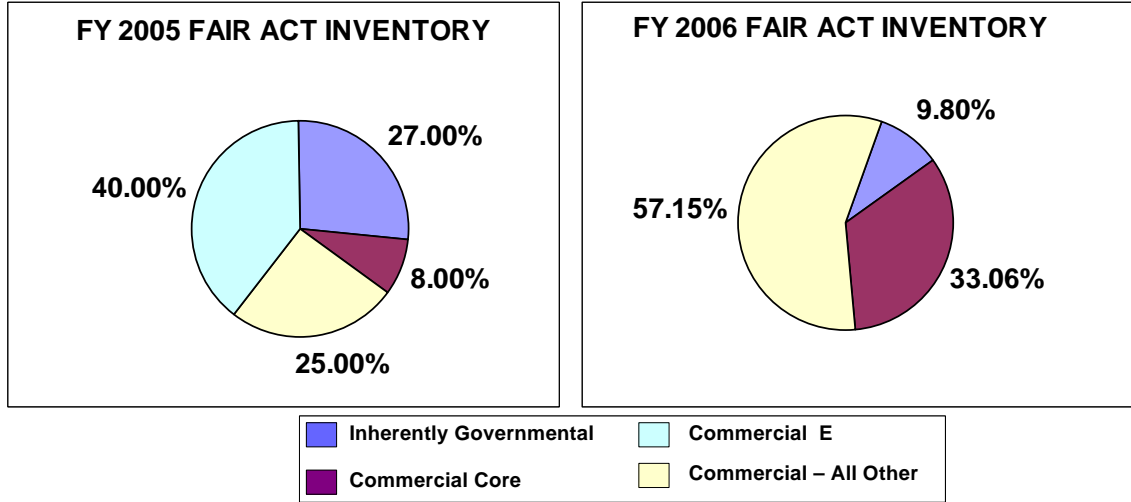
## **FINDINGS**

Reclamation's Inventory is submitted annually thru DOI to OMB. Until OMB releases the inventory, related data cannot be released to the public. Therefore, Team 10 has developed a separate Report of Findings and Recommendations of their analysis. Summarized data based on the submission to OMB, which is subject to change, has been used to provide an overview of FAIR Act classification data in this report. While Team 10 will provide a list of commercial core positions and related justifications data per the Inventory to Action Item Team No. 12 (Team 12), the "critical determination of the sustainable core capability needed to achieve Reclamation's mission-critical work" will be completed as a part of Team 12's work.

When compared to the rest of the DOI, Reclamation's FY 2006 classification to IG and commercial appears reasonable, if not a little light on the IG side. For example, based on the last published Inventory (FY05), the DOI-wide percent of FTEs classified IG is 39% and 61% commercial. Reclamation's classification for this same period was 27% IG and 73% commercial. Only two DOI bureaus have higher distributions to commercial – the Bureau of Indian Affairs and the National Park Service. Given the missions of these agencies, common commercial activities of operating schools and maintaining buildings and parks, respectively, their ratios would be higher. As the following charts demonstrate, the percentage of FTE's Reclamation coded to IG decreased significantly in the FY06 Inventory. Since the information on other DOI bureaus is unavailable, a comparison of the FY06 information is not possible.

For comparison purposes, the following charts reflect the FAIR Act Inventory distribution for all positions in Reclamation for FY 2005 and FY 2006 and do not represent rightsizing:

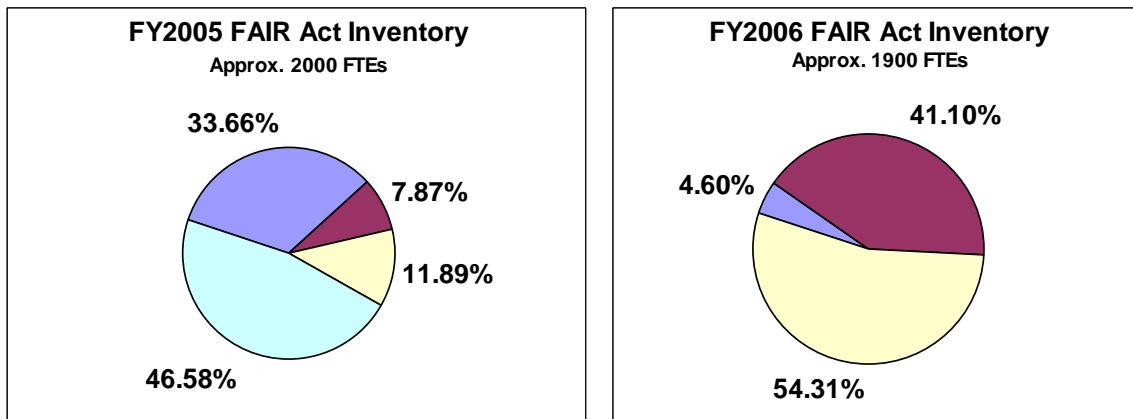
**Reclamation wide**  
Approximately 6,000 FTEs







The review and analysis for Action Item No. 10 was limited to the subset of Reclamation-wide technical resource occupations (roughly 1900 positions) identified by Action Item No. 9 (see Table 1 in the Appendix). No new data was collected. To perform a comprehensive review and validate the existing data, supervisors and staff would need to be interviewed and position descriptions reviewed to gather and/or further clarify data provided in order to do a final determination of classification. The IG variation between FY 2005 and FY 2006 was due to significant changes in OMB guidance for IG classification—particularly in the areas of supervisor and contracting officers representatives as well as “preponderance” of duties (25% of more) coding.

The summary classification distribution for the subset of technical resource occupations for FY 2005 and FY 2006 is as follows:

**Subset of Technical Resource Occupations Reclamation wide**



 Inherently Governmental	 Commercial E
 Commercial Core	 Commercial – All Other

In addition to data collection and process improvements, an analysis of including additional data elements that could be used to perform organization reviews and potential future A-76 Pre-Study activities was performed. It was determined that additional data elements should not be added to the FAIR Act Inventory database. These types of data elements would require greater detail and breakout than that required for FAIR Act Inventory purposes. Logical roll up of this detail data into FAIR Act data isn't possible. Adding these types of elements would corrupt the FAIR Act data to the extent that it would be rendered useless. Extensive time and effort would be required for gathering and maintaining the data. The best time to gather this data would be when areas for pre-study have been identified.

### **SCOPE OF RECLAMATION-WIDE TECHNICAL RESOURCE OCCUPATIONS**

In reviewing the detailed classifications and justifications language for many of the occupations defined by Action Item No. 9 (Table 1, Appendix A), it was discovered that the scope of activities performed by the Reclamation-wide technical resource occupations identified may extend beyond E&DS workload. These positions encompass most engineering and technical resource staff Reclamation-wide. However, there may be some activities missing that are performed by staff outside the defined scope.

As a part of the examination of E&DS, beyond identifying potential job series as a means of determining what activities are included, an analysis of what activities and purpose and extent actually performed by these job series must be accomplished. Further, for a variety of reasons, job series is not always the true indicator of what a position does; e.g., the obvious 800 series Area Managers. Inventory justification language for the activities of these occupations provided detailed information to begin the analysis and parameter criteria. This analysis will provide the necessary data to guide the Action Item No. 12 rightsizing process by suggesting parameters to use to determine what to consider in and what is out in the development of the right-sized organization. It may also prove useful to Action Items No. 26 and 27.

The landscape of Reclamation has changed significantly during the past decade. One thing that has not changed, in fact it has increased in importance, is the primary emphasis on operating and maintaining Reclamation's infrastructure (Dams, Reservoirs, Powerplants, and massive quantities of land that has been either acquired or withdrawn for project purposes). The changes in Reclamation's focus and mission places an even greater importance on planning – not just for potential constructed solutions, but for better decision making related to the operation and maintenance of Reclamation's projects. In other words, not all planning is related to construction. The roles of many disciplines in Reclamation have evolved to this change in focus. For Reclamation to succeed in its implementation of the National Research Council's recommendations, it is critical to recognize that the shift in focus and the activities performed has occurred and must be applied in these types of studies.

While some of the disciplines represented in the subset may be recipients of or provide data in support of engineering designs, estimates, and construction management on an occasional basis,

their primary purpose is directed toward the change in Reclamation’s mission or the preservation of its original mission (e.g., economists with repayment and water contracting responsibilities; biologists, ecologists, natural resources, and environmental specialists whose primary responsibility is compliance with other federal laws; land resources staff involved in the day-to-day management of acquired and withdrawn land, etc.). To include these activities in a study of E&DS is problematic since these activities are day-to-day facility operations and/or program management and not a technical service. With that said, it should be noted that many of these positions will be included in M4E Action Item Nos. 26 & 27 analysis when looking at outsourcing O&M of Reclamation’s facilities. Once again, the analysis of what activities and purpose and extent actually performed by these positions must be accomplished as a part of those Action Items analysis.

Another critical item to consider in establishing parameters for E&DS rightsizing is to answer the question – What services would be a part of E&DS and thus a part of a potential statement of work versus what services would be considered “Government-furnished” and not a part of a potential statement of work? Providing data to E&DS to feed a design or construction activity is one area where this is particularly delicate. For example, an Area Office may be asked to provide a set of data regarding local equipment or facility features needed for design development or construction. The assignment might be given to one of three local Natural Resources Specialists to gather. The next time this type of request comes in, a different Natural Resources Specialist or a different position is given the assignment. This demonstrates that this is not a common activity for these positions. Should this be considered an activity that is included in E&DS or simply an activity that feeds it? This example touches many areas; e.g., archeology, biology, hydrology, anthropology, cartography, etc. The answer to this question makes a significant difference when determining what “positions”, in whole or in part, are to be included in the E&DS organization. It is probably more efficient for the Government to consider these types of activities as “Government-furnished” rather than trying to staff to it. The non-E&DS activities of these positions, which are the major part of the position, would have to remain at the local office area. How would the activities be split and out of what positions? In terms of a statement of work, it would be extremely difficult, if not impossible, to implement at an individual office level, and most likely very inefficient since the workload is random and not a regular set of duties.

The scope will be reviewed and refined as a part of the right-sizing process. This data will also serve as pivotal guidance to maintaining the FAIR Act Inventory leading to common and consistent coding of these types of activities in correct functional categories.

## **TEAM’S SUMMARY**

A FY06 FAIR Act Inventory database and the Report of Findings and Recommendations have been provided to Team 12. The Inventory database has been enhanced with additional codes, queries, and reports to facilitate analysis of the data for the rightsizing effort. The findings provide extensive specific examples of what types of activities should be included or excluded from inherently Governmental and commercial core. Following are the major points that the team gleaned from the Inventory data as it relates to the M4E objectives.

- Classifying activities in accordance with the FAIR Act is an evolving process. Refining and improving guidance and adjusting accordingly continue to get better each cycle. The rightsizing process will provide comprehensive guidance for CA for future FAIR Act Inventory processes. At some point, the FAIR Act Inventory process will become routine.
- While FAIR Act Inventory data is one of many factors used in reviewing organizational alignment, FAIR Act classification GUIDANCE should be used to determine classifications for organizational alignment.
- Some activities performed may extend beyond the scope of ED&S and Technical Services workload defined by Action Item No.9 and some may be missing. The scope will be refined as a part of the right-sizing process.
- Determining commercial core classification requires a corporate perspective. These activities must be core to Reclamation's mission. As mission objectives change, so does commercial core requirements. For that reason, reviewing and adjusting organizational alignment is a continuous process and should be integrated into the model for ED&S and Technical Services.

# APPENDIX

**Table 1--FY 2006 FAIR Act Inventory**  
**Subset of Technical Resource Occupations Reclamation-wide**

Job Series	OPM Position Title	Job Series	OPM Position Title
<b>Engineering</b>		<b>Social Sciences</b>	
801	GENERAL ENGINEER	101	STUDENT ADVISOR/MENTOR
802	CIVIL ENGINEERING TECHNICIAN	102	SOCIAL SCIENCE AID & TECHNICIAN
803	SAFETY ENGINEER	110	ECONOMIST
806	MATERIALS ENGINEER	132	INTELLIGENCE RESEARCH SPECLST
807	LANDSCAPE ARCHITECT	150	GEOGRAPHER
808	ARCHITECT	170	HISTORIAN
809	CONSTRUCTION INSPECTOR	184	SOCIOLOGIST
810	CIVIL ENGINEER	186	SOCIAL SERVICES ASSISTANT
817	SURVEYING TECHNICIAN	188	RECREATION SPECIALIST
818	ENGINEERING DRAFTSMAN	189	RECREATION ASSISTANT
819	ENVIRONMENTAL ENGINEER	190	GENERAL ANTHROPOLOGY
830	MECHANICAL ENGINEER	193	ARCHEOLOGIST
850	ELECTRICAL ENGINEER	199	STUDENT TRAINEE (ECONOMIST)
854	COMPUTER ENGINEER		
855	ELECTRONICS ENGINEER	<b>Biological Sciences</b>	
856	ELECTRONICS TECHNICIAN	401	NATURAL RESOURCE SPECIALIST
890	AGRICULTURAL ENGINEER	404	BIOLOGICAL SCIENCE TECHNICIAN
893	CHEMICAL ENGINEER	408	ECOLOGIST (SR PROG MGR-MSCP)
899	STUDENT TRAINEE (CIVIL ENGR)	430	RESEARCH BOTANIST
		459	IRRIGATION SYSTEM OPERATOR
<b>Physical Sciences</b>		470	SOIL SCIENTIST
1301	PHYSICAL SCIENTIST	471	CONSERVATION AGRONOMIST
1311	PHYSICAL SCIENCE TECHNICIAN	480	FISH & WILDLIFE PROGRAM SPEC
1313	GEOPHYSICIST	482	FISHERY BIOLOGIST
1315	HYDROLOGIST	486	WILDLIFE BIOLOGIST
1316	HYDROLOGIC TECHNICIAN	499	STUDENT TRNEE (NAT RES)
1320	CHEMIST		
1340	METEOROLOGIST		
1350	GEOLOGIST		
1370	CARTOGRAPHER		
1371	CARTOGRAPHIC TECHNICIAN		
1373	LAND SURVEYOR		
1399	STUDENT TRAINEE (PHYS SCI)		