



# United States Department of the Interior

FISH AND WILDLIFE SERVICE

Washington, D.C. 20240

DEC 20 2006

IN REPLY REFER TO:  
FWS/PDM/029017

## Memorandum

To: Service Directorate  
From: <sup>Acting</sup> Director *Michael P. Jones*  
Subject: 2007 FAIR Act Inventory

The purposes of this memorandum are to:

1. Provide guidance for the 2007 FAIR Act Inventory process
2. Provide information about changes to the Inventory development process
3. Establish dates for completion of field input.

PDM has completed the download of employee data from the final pay period of FY06. This information has been cross referenced to the 2006 Inventory and all vacancies you reported have also been added. PDM will update the FAIR Act Inventory database with the new data and will send it to you during the week of January 8, 2007. PDM will provide codes for all positions. Unless you disagree with the coding you will not have to do anything but validate the position. If you disagree, you will have to prepare the justification in a separate field.

Due to additional requirements of the Privacy Act, PDM will assign all user names and passwords for access to the database. It will also be necessary for all users to sign Privacy Act non-disclosures which PDM will retain.

Just as last year PDM will send instructions, DOI guidance, and additional information to HROs during the week of January 2, 2007.

In order to meet the deadline for submission of the Inventory to the Department, all field data entry must be completed by February 15, 2007. The Service made great strides toward consistency in coding of functions in 2006. We all agree that consistency does not preclude difference, but the reasons for those differences must be clearly defined. The 2007 Inventory process will focus on consistency within and between Regions for the use of Reason Codes and Justifications for the Function Codes.

Questions should be directed to Marcia Cash at 703.358.2013 ([Marcia\\_Cash@fws.gov](mailto:Marcia_Cash@fws.gov)) or Kathy Garrity at 703.358.2551 ([Katherine\\_Garrity@fws.gov](mailto:Katherine_Garrity@fws.gov)).



## Department of the Interior (DOI)

### Instructions for Completing the Year 2007 FAIR Act Commercial Activities Inventory and the List of Inherently Governmental Positions

#### General Guidance:

- We recommend you use FPPS as of **September 30**, 2006 as the primary source of data for these inventories.
- DOI bureaus will use the OMB FY 2006 Excel spreadsheet (see web link in attachment list below) to submit their '07 inventory. In FY 2007, CCSE will upload each bureaus inventory into the OMB's workforce inventory tracking system (WITS). Include all FTE (commercial and inherently governmental) as one inventory.
- Submit inventory electronically to CCSE by March 30, 2007.
- All full-time, part-time and seasonal FTE including vacancies are to be **included** in the inventory.
- **Do not include contractor employees or volunteers** in the FTE counts. According to the DOI Budget Office, the most accurate FTE count would be the '07 estimated FTE presented in the '08 Budget. There may be a slight variation between this number and the number OMB publishes with their FAIR Act guidance. We will address that issue when the OMB guidance is published.
- All guidance on FAIR Act inventory coding from program offices issued to date is canceled. In the future, all guidance on inventory preparation will come through the Department's competitive sourcing office over the signature of the Deputy Assistant Secretary for Performance, Accountability and Human Resources.
- OMB allows for the reporting of fractional FTE in the inventory submission in fractions no smaller than one-quarter. We suggest you use the preponderance of duty as a guide. What is the primary function of the FTE versus other duties as assigned?
- In the **State** field of the spreadsheet, enter States within the United States by its common two-letter postal service code abbreviation. (for example: AL, MD, CO) For locations outside the United States, **spell out** the city and the country's name. For example, City: SAIPAN; Country: MARIANA ISLANDS or City: SAN JUAN; Country: PUERTO RICO (remember to capitalize **all** letters in cities, states, and countries).
- In the **First Year Appeared on Inventory under FAIR** field all **new** FTE on the inventory would have "07" listed on the spreadsheet. Also, if you change FTE from inherently governmental to Reason Code A, the 1<sup>st</sup> year appeared on the inventory would be "07." However, changing FTE from one function code to another **is not** a reason to change the date.

#### Function Code Guidance:

- OMB will not accept any new function code category requests (i.e. making up new numbers like F420 or Z005) for the inventory. However, OMB allows agencies to write function code definitions that describe their mission using established function code numbers. DOI, in conjunction with its bureaus, developed a revised list of function code definitions for the '06 inventory and updated some of these definitions for the '07 inventory. The attached 2007 Function code definitions should be used for inventory preparation.

**Reason Code Guidance:**

- FTE are to be coded Commercial “B” unless justified in writing as Inherently Governmental or Commercial Reason Code “A” unless the FTE fall under other approved Reason Codes in the Circular. Justifications must be submitted along with your inventory.
- Written justifications for both Inherently Governmental and Commercial Reason Code “A” FTE are to be signed at or above the Assistant Director for Administration level. Justifications will be reviewed and approved by the CSO and OMB. OMB is looking for consistency and accuracy between agencies and the Department is looking for consistency and accuracy among bureaus. In order to successfully defend our inventory, we need to be able to understand and come to agreement on coding decisions.
- Review your justifications and make changes based on the revised function codes and their definitions.
- Attached for your use are examples of DOI Inherently Governmental and Commercial Definitions.
- Attached is the Justification Template.

**Consistent DOI coding information:**

- Coding of supervisors and managers: Bureaus should consider coding FTE that manage commercial activities or functions under the same reason code as the commercial activity or function they supervise. For example, a first-line supervisor of clerical functions may be appropriately coded as Reason Code “B”. Managers at headquarters offices may be inherently governmental as they generally sign off on and implement policy for a function. Mid-level managers may reasonably be coded as Reason Code “A” with a proper justification. Mid-level managers may supervise a combination of FTE - inherently governmental, core to the mission and commercial “B”. They are also at the organizational level to step into senior level management positions.
- Disabled employees. Based on OMB’s 2005 FAIR Act guidance bureaus may, at their option, use reason code A in connection with positions held by individuals with disabilities. Although the inventory is based on FTE (spaces) and not individuals (faces), this is an exception.
- Students. For the two most widely used programs, Student Career Experience Program (SCEP) and Student Temporary Employment Program (STEP), SCEP students may lead to federal employment and FTE may be coded as reason code A. STEP student FTE should be coded based on the function being performed.
- All secretarial and clerical functions (generally most of the GS-0300 job series except for GS-0301, 0340, 0341, 0343 which are project/program management series) should be coded under Y000.
- All Information Technology (IT) FTE (Job Series 2210, 2299 and 2502 for example) should be coded under “W – Communications, Computing and Other Information Services”.
- All wildland fire FTE should be coded under Function Code S440 per the fire matrix which is being reviewed by both the fire program offices and competitive sourcing offices of BIA, BLM, FWS, NPS and the Forest Service. The revised fire matrix will be available in mid-January.
- According to OMB guidance, Contracting Officer Technical Representative’s (COR/COTRs) are more accurately coded under Reason Code “A” than inherently governmental. The reason for this is that it is the warranted contracting officers who have actual signatory authority for contracts and are considered inherently governmental, COR’s have no signatory authority but only recommend actions to the contracting officer. COR duties are generally considered not suitable for competition because of their relationship with the contracting officer and that they have the core expertise necessary to assure the

Government is getting what it pays for. COR's are the subject matter experts needed in-house to assess contractor performance.

- In an effort to be more consistent across all bureaus, code FTE performing specific functions to the function code category specifically designated for that function. Examples of proper coding include Budget and Finance to Function Code C – Finance and Accounting; Procurement, Contracting, Acquisition to Function Code F – Procurement; Human Resources to Function Code B – Personnel Management. Examples of incorrect coding include coding a contracting FTE to Function Code R (Research, Development, Test and Evaluation) because they write research and development contracts or coding personnel classifiers to Function Code I (Investigations) because they support a law enforcement office. Try to be as consistent as possible.

Attachments:

1. Revised function code definitions
2. Justification Template
3. Estimated DOI '07 FTE totals by bureau from FY08 Budget
4. Samples of IG/commercial reason code A justifications
5. OMB website URL: [www.whitehouse.gov/omb/procurement/fair-index.html](http://www.whitehouse.gov/omb/procurement/fair-index.html)

## 2007 FAIR Act Inventory Additional Service Guidance on Coding

It is time once again to begin the FAIR Inventory development process. As stated in the Director's memorandum of December 20 (attached) we are beginning with a more accurate basis for the FY07 Inventory, so we do not anticipate that the process will be nearly as burdensome this time.

PDM has preassigned the DOI-approved codes to all FTE based on last year's codes (and to all vacancies based on the series and job title). Codes have been assigned to each FTE based on the 2006 Inventory and what we perceive to be the preponderance of duties for the series and grade.

You will note several changes from the coding of last year's Inventory, most significantly

- ✦ Commissioned Law Enforcement Officers have all been moved to Function Code I200 at 100% and are coded IG. This is in response to Department guidance. Please do not make any changes to this coding unless the individual is not a commissioned law enforcement officer
- ✦ We now have only one Function Code for all geospatial activities (M318). Any FTE who were coded to W430 last year have been moved to M318.
- ✦ Education and Training Function Codes (2006 all were U300) have been split into Employee Development (U300) and Interpretive Education (U540). We have made changes based on job descriptions. Please validate.
- ✦ Senior Executive Leadership now has a separate Function Code (Y105). Please carefully review the definition for this new Function Code. We have moved all FTE into this code based on Series, title, and grade.
- ✦ To achieve consistency, all Administrative Officers have been moved to Y810 at 100%. Please do not change unless the individuals do not act as Administrative Officers.

OMB guidance allows up to four codes to be assigned to an FTE (no less than 25%) if the duties performed are **distinct** and would not be a part of the work regularly performed as a part of that function.

Examples:

- ✦ GS 0343 – Function Code D200  
This is a management analyst who collects and analyzes data. Included in the regular performance of work for this series/function code are computer database development, filing, correspondence, and interviewing. However, those activities should NOT be assigned separate function codes because they are an integral part of the work.

- ✦ GS 0025 – Function Code E120 75%, and S440 25%  
This is a Park Ranger whose primary duties include all aspects of managing the park. This Park Ranger also, however, REGULARLY fights wildland fires 30% of the time (an activity NOT associated with performing Park Ranger duties. Therefore, these may be reported as two distinct Function Codes.
  
- ✦ GS 0341 – Function Code Y810  
Included in the regular performance of the work of Admin Officers are budget tracking, purchasing, payroll functions, and general clerical functions. . However, those activities should NOT be assigned separate function codes because they are an integral part of the work.

We look forward to working with closely with you. For Region 9, Marcia and Kathy will work directly with each AD to complete the Inventory. If you have any questions, please contact Marcia Cash (phone - 703.358.2013, email – [Marcia\\_Cash@fws.gov](mailto:Marcia_Cash@fws.gov)) or Kathy Garrity (phone – 703.358.2551, or [Katherine\\_Garrity@fws.gov](mailto:Katherine_Garrity@fws.gov)).