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Report to the Chairman, Committee on Appropriations, U.S. Senate

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LAND MANAGEMENT AGENCIES

Information on Selected Administrative Policies and Practices

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The Honorable Ted Stevens
Chairman, Committee on
Appropriations
United States Senate

Dear Mr. Chairman:

The federal government owns and manages approximately 650 million acres of land in the United States—over a quarter of the nation's total land area. Ninety-six percent of the federal land is managed by four agencies: the National Park Service, the Fish and Wildlife Service, and the Bureau of Land Management, all within the Department of the Interior; and the Forest Service, within the Department of Agriculture.

Each of the four agencies has its own unique mission and responsibilities for the lands and resources under its jurisdiction. The Park Service is responsible for preserving and protecting 78 million acres of the nation's land, which include national parks. The Fish and Wildlife Service manages 87.5 million acres for the conservation and protection of fish and wildlife. Both the Bureau of Land Management and the Forest Service support a variety of uses of the lands that they administer, including recreation, timber harvesting, livestock grazing, and the production of minerals.

In fiscal year 1995, the four agencies employed over 75,000 full-time-equivalent employees. Combined, the agencies received new budget authority in excess of $8 billion. They provide some of their employees with rental housing, authority to use the agency's vehicles, and allowances to buy uniforms; the agencies also encourage and pay for some employees to move to different geographic locations during their careers.

Concerned about the efficiency and cost-effectiveness of the administrative functions performed by these four agencies, you (in your former capacity as Chairman of the Senate Committee on Governmental Affairs) asked us to compare their policies and practices pertaining to (1) the reasons for and the costs of field-unit managers' geographic relocations;[1] (2) the authorization for and the quantity and condition of employees' rental housing; (3) the requirements for providing employees' uniforms and the expenditures for them; and (4) the authorizations for

[1]In a separate review, we are assessing relocation practices and costs governmentwide and expect to issue our report in the spring of 1997.

employees' home-to-work travel in their agency's vehicles. Additionally, you asked us to compare the processes by which the Bureau of Land Management and the Forest Service issue grazing permits and to highlight the similarities and differences between the two agencies' grazing programs.[2]

Results in Brief

Only the Forest Service has written policies expressing the value and necessity of relocating employees if they hold or aspire to hold managerial positions. However, the importance of relocating employees is an unwritten tenet of the other three agencies' culture. According to the four agencies' managers, relocations are encouraged because they allow employees to gain experience by working in different geographic areas and with different kinds of people and because relocations also infuse agencies' units with fresh ideas. Managers also cited disadvantages to relocations, including hardships on families and disruptions in managers' efforts to gain the trust of local communities. During October 1, 1991, through June 30, 1996, the four agencies reported spending about $8.4 million to relocate about 380 managers. (See app. I for more information on the four agencies' policies and practices on employee relocations.)

Federal law authorizes agencies to grant housing to employees who must live on the land to provide services or protect property or to grant housing if it is not available within a reasonable commuting distance; the four agencies' policies follow these criteria. According to a database of the government's rental housing maintained by Interior's Bureau of Reclamation, the four agencies had 11,464 housing units (ranging from houses to tents) as of January 1997. Most of these units were somewhat deteriorated or needed routine maintenance, although some needed major repairs or replacement. The agencies estimated that about $470.2 million would eliminate their backlog of rehabilitation, repair, and replacement needs for their housing units. (See app. II for more information on the four agencies' policies and practices on employee housing and for a summary of previous GAO and Inspector General reports addressing employee housing.)

All four agencies believe that their employees should be easily identified, and all four have policies requiring or authorizing employees to wear uniforms. Each agency provides employees who are required or

[2]Your office also expressed interest in our ongoing review of opportunities at Interior to reduce costs by consolidating telecommunications services. We expect to issue our report on this subject in the spring of 1997.

authorized to wear uniforms with an initial allowance (limited to $400 by federal law) and a subsequent replacement allowance (up to $400 annually, depending on the agency) to purchase uniforms. For fiscal year 1995, the four agencies reported spending about $8.6 million on uniforms for about 44,000 employees. (See app. III for more information on the four agencies' policies and practices regarding employees' uniforms.)

Federal regulations limit the use of agencies' vehicles for home-to-work travel to high-level officials, employees engaged in field work, and other employees in specific circumstances. The agencies' policies specify that only their Department's Secretary may authorize the use of an agency's vehicles for home-to-work travel and that such authorizations must be based on the increased efficiency and economy of government operations. In practice, the three Interior agencies—the Bureau of Land Management, Fish and Wildlife Service, and National Park Service—have authorized the home-to-work use of their vehicles for law enforcement personnel predominately (although the agencies have also authorized such use for emergencies or for travel to multiple locations during a day's work). Forest Service officials did not have information readily available on their authorizations of the use of the agency's vehicles for home-to-work travel because decision-making and record keeping in this regard are decentralized. (See app. IV for more information on the four agencies' policies and practices regarding the use of their vehicles and for a summary of previous GAO reports addressing such use.)

The Bureau of Land Management and Forest Service follow similar processes in issuing permits to ranchers to graze their livestock on federal lands, and both agencies charge the same grazing fees according to a formula set forth in law. Differences exist, however, in the two programs' authorizing legislation, requirements regarding the ownership of land and livestock, and conditions for transferring grazing privileges (e.g., upon the death of a permittee or the sale of a permittee's land). (See app. V for more information on the similarities and differences in the two agencies' processes for issuing grazing permits and for a summary of previous GAO reports addressing livestock grazing on federal lands.)

Agency Comments

We provided the Forest Service and Interior with a draft of this report for their review and comment. In commenting on the report, a program coordinator at the Forest Service's Personnel Management Branch suggested technical clarifications that we incorporated as appropriate.

In written comments, Interior provided us with a revised estimate from the Park Service of the cost to clear the backlog of repair, rehabilitation, and replacement needs of employee housing in the Service. In addition, Interior said that it is moving forward with an initiative to identify funding alternatives for the repair, rehabilitation, and replacement of employee housing in the Park Service. (See app. VI.) We incorporated this information in our report. Finally, Interior provided us with updated budget and employment data for the Bureau of Land Management and Fish and Wildlife Service. However, we did not use these data because Interior did not provide comparable information for the Park Service.

Scope and Methodology

We obtained most of the information presented in this report from interviews with headquarters officials who are responsible for and/or cognizant of their agency's policies on employee relocation, housing, uniforms, and home-to-work travel in their agency's vehicles. We also reviewed agencies' policies, cost information, and other relevant documents provided by these officials. When applicable, we also obtained and reviewed federal statutes and regulations.

To identify the number and costs of field-unit managers' relocations, we asked each agency to tell us how many times the top manager had changed from October 1, 1991, through June 30, 1996, and the reasons for those changes for the following field units: (1) the Park Service's national parks, national monuments, and comparable units; (2) the Fish and Wildlife Service's refuges; (3) the Bureau of Land Management's resource areas; and (4) the Forest Service's national forests. We also randomly selected and interviewed 13 managers of these field units to obtain their views on the benefits and disadvantages of relocations.

For information on housing, uniforms, and vehicles for employees, we interviewed cognizant officials at each agency to obtain information on the agency's current practices. We relied on the data that the officials provided us with regarding the estimated costs to maintain, repair, or replace housing units; the expenditure of allowances for uniforms; and the number of employees authorized to use their agency's vehicles for home-to-work travel. For all four agencies, we obtained information on the number of housing units and their condition from the centralized database managed by Interior's Bureau of Reclamation.

As you requested, we limited our review of the processes by which grazing permits are issued to two agencies: the Bureau of Land Management and the Forest Service. We interviewed officials who are responsible for their respective agency's grazing programs at the two agencies' headquarters, at the Bureau's Colorado State Office, and at the Forest Service's Rocky Mountain Regional Office (Region 2) in Colorado. We also visited the Bureau's Uncompahgre Basin Resource Area Office and the Forest Service's Ouray District Office, which are located in Montrose, Colorado, to interview grazing program officials on the grazing permit process and review grazing permit files.

We conducted our review from August 1996 through January 1997 in accordance with generally accepted government auditing standards. We did not independently verify or test the reliability of the data provided by the agencies.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 7 days after the date of this letter. At that time, we will send copies to the Ranking Minority Member of the Committee, the Chairman and Ranking Minority Member of the Senate Committee on Governmental Affairs, and the Secretaries of Agriculture and the Interior. We will make copies available to others on request.

If you or you staff have any questions, please call me at (202) 512-9775. Major contributors to this report appear in appendix VII.

Sincerely yours,

Barry T. Hill

Barry T. Hill
Associate Director, Energy, Resources,
and Science Issues

Contents

Abbreviations

BLM	Bureau of Land Management
FS	Forest Service
FWS	Fish and Wildlife Service
GAO	General Accounting Office
NPS	National Park Service
OMB	Office of Management and Budget

Employee Relocations

Although only the Forest Service (FS) has policies pertaining to employee relocations, the four land management agencies that we reviewed—the National Park Service (NPS), the Fish and Wildlife Service (FWS), the Bureau of Land Management (BLM), and FS—have similar practices. Of the four agencies, only FS currently has written policies that express the value and necessity of "mobility" (i.e., the willingness to relocate) for employees who hold or aspire to hold managerial positions at the agency. However, the managers we interviewed from the other three agencies said that at their agency as well, employee mobility is a tenet of the corporate culture and that employees believe that they may have to relocate if they wish to move ahead in the organization.

We asked the agencies for information on turnovers in the top management positions at certain field offices during October 1, 1991, through June 30, 1996.[1] According to the agencies' responses, there were 428 turnovers. Of those, 253 (59 percent) came about because the previous manager either had been promoted or reassigned. Furthermore, 371 (87 percent) of those who filled a land unit manager vacancy relocated to do so.

The four agencies also reported spending about $8.4 million to relocate 384 land unit managers from October 1, 1991, through June 30, 1996.[2] According to an Interior official, the cost of these relocations is just a small part of the cost of all relocations. Agency officials said that the cost of relocating an employee can be quite high—sometimes $50,000 or more. Table I.1 shows the total and average costs reported by the four agencies to relocate land unit managers from October 1, 1991, through June 30, 1996.

[1]The management positions that we were interested in were those of "land unit managers," such as park superintendents, refuge managers, resource area managers, and forest supervisors.

[2]This information was taken from agencies' financial records, whereas the data reported in the prior paragraph were taken from personnel or other agency records. Because the agencies reported the number of managers relocated as 371 and 384, our letter states "about 380" managers relocated.

Table I.1: Relocation Costs for Land Unit Managers, October 1, 1991, Through June 30, 1996

Agency	Number of land unit managers moved	Average cost per move	Total cost
NPS	153	$15,156[a]	$2,318,920[a]
FWS	129	24,502	3,160,761
BLM	46	18,112	833,137
FS	56	36,863	2,064,350
Total	**384[b]**	**$21,816**	**$8,377,168**

[a]Amounts exclude costs incurred by NPS when employees sold their house through a contracted relocation service. This cost may have been a flat fee (about $13,000 per house), or a percentage of the house's value (ranging from about 13 to about 26 percent), depending on the location and value of the house.

[b]This total does not represent the 371 managers that the agencies reported as relocated during this same period because the agencies' data included in this table were taken from financial records, whereas the previous data were from personnel or other agency records.

Source: Agencies' data.

Managers from all four agencies spoke of the many benefits that relocations offer—both to the individual and the agency— as well as the numerous disadvantages they bring. Among the benefits they cited was the infusion of new ideas into a land unit, thus preventing the unit's management from becoming too parochial. Relocations also provide managers with a variety of experiences in different geographic areas and with different types of people.

The managers also cited numerous disadvantages to relocations. Several mentioned the hardship on families—for example, the disruption of the children's schooling and the spouse's career. Additionally, several spoke about the time it takes for managers to gain the trust of local communities and how relocations can disrupt that trust. For example, one manager said: "Local communities are totally dependant on the federal lands and rely on the government to make wise decisions regarding the land. However, these communities do not form trusting relationships with federal managers very quickly."

Housing

NPS, FWS, BLM, and FS have similar policies and practices governing the provision of rental housing. These policies and practices are based on the various laws and administrative guidance that set eligibility requirements and are based on how rental fees are calculated. Each of the agencies reported having a backlog of housing repair, rehabilitation, and replacement work and reported that the estimated combined cost of eliminating the backlog is about $470.2 million.

According to applicable laws,[1] federal agencies are authorized to provide seasonal employees with housing when necessary and provide permanent employees with housing when the agencies determine that

- employees must live on the federal land to render necessary visitor services or to protect government property or
- present and prospective housing are not available for sale or rent within a reasonable commuting distance.

Agencies' policies also require that the need for rental housing be examined annually and, absent adequate justification, excess housing be removed from the housing inventory. The annual reexamination of housing needs is required because changes can occur in the viability of local real estate markets. For example, a park that has been classified as "isolated" may have become less so because of population increases in nearby communities.

Also, each agency is subject to the provisions of Circular A-45, issued by the Office of Management and Budget (OMB). This circular, dated October 20, 1993, sets out criteria for agencies to use in establishing rental rates. Generally, agencies' rental rates

- should be based on reasonable value; that is, they should be set at levels equal to those prevailing in comparable private housing located in the same area and
- may not be set to provide tenants with a housing subsidy, serve as an inducement in recruiting or retaining employees, or encourage the occupancy of existing government housing.

All four of the agencies participate in a multiagency program administered by the Department of the Interior's Bureau of Reclamation. The program establishes base rental rates for government rental housing, conducts

[1]The Federal Employees Quarters and Facilities Act of 1964 (P.L. 88-459) and the Government Organization and Employees Act of 1966 (P.L. 89-554).

surveys of regional housing markets, and uses statistical programs to establish base rental rates. These rates are derived from the consideration of many factors, such as the housing's location, type, age, size, and condition. Once the base rental rates are established, OMB's guidance requires agencies' managers to administratively reduce rents for isolated (i.e., remote) locations and allows further reductions for a variety of other factors, including the inadequacy or absence of standard amenities (e.g., street lighting, sidewalks, and reliable utilities). Adjustments are also made to account for the presence or absence of features such as fireplaces, garages, or central air conditioning.

The Bureau of Reclamation also maintains a database of government rental quarters—the Quarters Management Information System. This database contains comprehensive information on the participating agencies' rental housing, including the number of housing units and the housing's type, location, square footage, number of bedrooms and bathrooms, age, and interior and exterior condition. Table II.1 shows the number of housing units owned by the four agencies.

Table II.1: Housing Units Owned, by Agency

Agency	Housing units
NPS	5,401
FWS	757
BLM	252
FS	5,054
Total	**11,464**

Note: Although we obtained this information in January 1997, agency officials told us that not all of the data in the source database were current as of that date. Nonetheless, they are the most current data available at this time.

Source: Bureau of Reclamation's Quarters Management Information System database, as of January 1997.

For the four land management agencies we reviewed, the number and type of rental housing varied widely. Table II.2 shows the agencies' rental housing, by type.

Table II.2: Types of Units in Agencies' Housing Inventories

Housing unit category	Number of units				
	NPS	FWS	BLM	FS	Total
House	2,828	624	54	2,063	5,569
Apartment	971	11	2	141	1,125
Cabin	338	9	10	292	649
Mobile home	573	41	21	613	1,248
Travel trailer	47	11	1	134	193
Dormitory/ bunkhouse	197	23	152	1,062	1,434
Temporary[a]	0	15	2	12	29
Trailer pad	373	23	10	734	1,140
Tent	74	0	0	1	75
Total	**5,401**	**757**	**252**	**5,052[b]**	**11,462[b]**

Note: Although we obtained this information in January 1997, agency officials told us that not all of the data in the source database were current as of that date. Nonetheless, they are the most current data available at this time.

[a]Temporary housing uses construction methods or materials resulting in a useful life that is substantially less than that of houses built by standard construction, e.g., certain types of modular housing.

[b]These column totals include two housing units that FS did not have categorized by type.

Source: Bureau of Reclamation's Quarters Management Information System database, as of January 1997.

Similarly, the condition of the rental housing and cost estimates for needed repair, rehabilitation, and replacement vary across agencies. Table II.3 describes the housing's condition.

Table II.3: Condition of Rental Housing

	Percent of total inventory in each category of condition			
Condition	**NPS**	**FWS**	**BLM**	**FS**
Interior				
Excellent	8.5	2.3	8.3	7.6
Good	45.6	46.0	36.4	40.6
Fair	33.5	47.5	40.9	41.5
Poor	12.1	4.0	14.0	9.6
Obsolete	0.3	0.1	0.4	0.7
Exterior				
Excellent	8.0	1.9	8.3	8.9
Good	41.2	50.4	37.6	40.9
Fair	37.1	42.9	44.2	40.3
Poor	13.5	4.6	9.9	9.5
Obsolete	0.2	0.1	0	0.5

Note: This table, unlike tables II.1 and II.2, excludes trailer pads and tents—units for which no information on their condition is maintained in the database.

In describing the condition of their inventory, the agencies use nearly the same criteria: excellent means like new; good means that routine maintenance, like painting, is necessary; fair means that early signs of reversible deterioration (like leaking roofs or inadequate electrical service) are present; poor means that major repairs are needed because of marginal structural integrity; and obsolete usually means beyond economic rehabilitation.

Although we obtained this information in January 1997, agency officials told us that not all of the data in the source database were current as of that date. Nonetheless, they are the most current data available at this time.

Source: Bureau of Reclamation's Quarters Management Information System database, as of January 1997.

We asked the four agencies to provide us with cost estimates for eliminating the existing backlog of their inventory's need for repair, rehabilitation, or replacement. Two of the agencies—BLM and FS—told us that the estimates we reported in an August 1994 report were still the most current information available.[2] NPS and FWS officials provided us with the requested data. Table II.4 shows these estimates.

[2]National Park Service: Reexamination of Employee Housing Program Is Needed (GAO/RCED-94-284, Aug. 30, 1994).

Table II.4: Agencies' Estimated Costs to Clear Repair/Rehabilitation/Replacement Backlog

Dollars in millions

Agency	Estimated backlog cost
NPS	$300.0
FWS	13.2
BLM	8.0
FS	149.0
Total	**$470.2**

Source: Agency officials.

In a 1993 report, we found that NPS had adequately justified the need for about 88 percent of its housing but questioned its justification for the remaining 12 percent of its housing inventory.[3] As a result, we recommended that NPS reassess the need for all permanent housing and consider alternative funding methods to meet its housing needs. In response to our recommendations, NPS made a new housing needs assessment a critical element of each park's housing management plan (which must be reviewed and revised every 2 years) and now requires that the needs assessment be completed before funds are spent on new construction, major repairs or rehabilitation, or trailer replacement projects. Also, NPS worked with the Congress to pass legislation authorizing NPS to enter into alternative arrangements with developers or others for the provision of employee housing. In November 1996, the Omnibus Parks and Public Lands Management Act (P.L. 104-333) was enacted to, among other things, address concerns about the adequacy and cost of NPS' housing. Among other things, the act is intended to expand the alternatives available for the construction and repair of essential NPS housing and to ensure that adequate funds are available to provide for the long-term maintenance needs of NPS' field employee housing. In commenting on a draft of this report, Interior stated that it is moving forward with an initiative to identify funding alternatives for the repair, rehabilitation, and replacement of employee housing in accordance with this act.

In a January 1996 report, Interior's Office of Inspector General found that FWS spent $33,000 during fiscal year 1993 to maintain vacant housing and may have to spend an estimated $375,000 for long-term maintenance of

[3] National Park Service: Condition of and Need for Employee Housing (GAO/RCED-93-192, Sept. 30, 1993).

FWS' housing.[4] The Inspector General reported that FWS should evaluate the need for government-furnished housing at each location and dispose of housing that is no longer needed and cannot be converted to other uses. The report said the following: "Housing units that can be moved (particularly trailers) could be sold or scrapped, and those units for which repair is not feasible, that are unsightly, or that are safety hazards to the staff or visiting public could be demolished."

[4]Operation & Maintenance of Government Furnished Quarters, U.S. Fish and Wildlife Service, Office of Inspector General, U.S. Department of the Interior, Report No. 96-I-270 (Jan. 29, 1996).

Uniforms

NPS, FWS, BLM, and FS have similarities and differences in their policies and practices on the provision of uniforms. Each agency provides allowances for the initial acquisition and maintenance of uniforms issued; however, the amounts provided vary among the agencies. Similarities also exist in the agencies' policies and practices for obtaining uniforms, tracking allowances for uniforms, and funding the cost of uniforms. Differences exist in the agencies' policies and practices for requiring uniforms and for the type of uniforms available.

Each agency believes that it is important that its employees be easily identified. The agencies want their employees to be differentiated from the public and other government employees. To accomplish this objective, each agency supplies uniforms (or components thereof, such as hats or shirts) to those employees authorized to wear them. Employees at each agency may be provided with an annual allowance of up to $400 to purchase uniforms.[1] In fiscal year 1995, the latest year for which both allowance account and expenditure data were available from all four agencies, the agencies provided nearly 44,000 employees with uniform allowances. For the same fiscal year, the agencies spent over $8.5 million to provide their employees with uniforms. Table III.1 shows the agencies' number of employees with uniform allowance accounts and the amount of expenditures for uniforms for fiscal year 1995.

Table III.1: Uniform Accounts and Expenditures, Fiscal Year 1995

Agency	Employees with uniform allowance accounts	Expenditures for uniforms[a]
NPS	15,413	$4,168,561
FWS	4,400	1,188,000
BLM	5,120	407,077
FS	18,886	2,824,905
Total	**43,819**	**$8,588,543**

[a]The uniform expenditures shown in the table may include the purchases of uniforms (or components thereof) made by the agency for employees without individual allowance accounts. For example, if an employee needed a uniform or a component, but only for a short time, the agency could purchase it directly rather than establish an account for that person.

Source: Agencies' data.

All four agencies provide two different types of allowances: initial and replacement. An initial allowance is given to new employees, transferred

[1]The Federal Employees Uniform Allowance Act of 1954, as amended (5 U.S.C. 5901(a)), authorizes agencies to provide up to $400 per year per employee as a uniform allowance to defray the cost of purchasing uniforms. The act, as amended, also allows the Office of Personnel Management to adjust the maximum allowance for uniforms from time to time.

employees, or employees with new duties to help defray the cost of purchasing uniforms required by their unit. A replacement allowance enables employees to maintain their uniforms from year to year and to purchase additional items required by changes in their work location, duties, or uniform standards. Table III.2 shows the initial and replacement allowances and allowance ranges provided by each agency.

Table III.2: Initial and Replacement Allowance Amounts, by Agency

Agency	Initial allowance amount	Annual replacement allowance amount
NPS	$320 to $400, on the basis of type of uniform and whether the employee is permanent or seasonal	$135 to $320, on the basis of type of uniform and whether the employee is permanent or seasonal
FWS	Up to $400, on the basis of components needed	Up to $300, on the basis of type of uniform
BLM	Up to $400, on the basis of components needed (policy recommends $400)	Up to $400, on the basis of program needs (policy recommends $250 to $350, on the basis of type of uniform)
FS	$161 to $400, on the basis of type of uniform and need	$83 to $400, on the basis of type of uniform and need

Source: Agencies' policies; agency officials.

The amount of allowance that employees are provided with can vary on the basis of several factors, such as what type of uniform is required, what the cost of needed components is, and whether the employee holds a permanent or a seasonal position. Accordingly, allowances can vary, both within and across agencies.

The four agencies have similar policies and practices for obtaining uniforms, tracking uniform allowances, and funding the cost of uniforms. Each agency contracts with a company to provide uniforms and to maintain a database that tracks the balance of each employee's allowance. The agencies pay the contractor for the uniforms delivered. None of the agencies have an appropriations line item for uniforms. Instead, the cost of uniforms is funded by the agency units and programs for which the uniformed employees work.

The four agencies have different policies and practices for requiring employees to wear uniforms and for the type of uniforms available to employees. FWS is the only agency that requires all permanent field office employees, unless specifically excepted, to own and wear uniforms; it has no similar requirement for regional or headquarters employees. At the other agencies, certain employees are authorized to wear uniforms for a variety of reasons, for example, when the employees have significant, frequent, or recurring contact with the public and when it is important for employees to establish their authority or identification as agency representatives. The agencies also differ in the types of general uniforms available. FS has two types: dress and field. BLM has three types: dress, field, and work. FWS also has three types: dress, standard, and field. NPS has seven types: formal, semi-formal, service (class A), field, work (class A), service (class B), and work (class B). In addition to these types of general uniforms, the agencies have various special-purpose uniforms (and components) for specialized work such as fire fighting, law enforcement, lifeguarding, nursing, and volunteering. An NPS official told us that the agency has more categories of uniforms than the other agencies because NPS "has a wider breadth of responsibilities than other land management agencies, ranging from very high profile management of nationally significant sites, like Independence Hall and the White House, to dirty day-to-day field work." He added that the formal, semi-formal, service, field, and work (class A) uniforms do not vary much.

Vehicles

The policies used by NPS, FWS, BLM, and FS governing the use of their vehicles for home-to-work transportation are similar; we found no significant differences. These policies are consistent with governmentwide regulations.

Both the Department of Agriculture and the Department of the Interior have policies for employees' use of the agencies' vehicles for home-to-work travel. These policies reflect the governmentwide regulations, issued by the General Services Administration, that limit the use of government vehicles for home-to-work travel to three groups of employees: (1) high-level federal officials, (2) employees engaged in field work, and (3) other employees when there is a compelling operational consideration, a clear and present danger, or an emergency.

The two Departments' policies are similar. For example, they

- specify that only the Secretary may authorize the use of an agency's vehicles for home-to-work travel;
- provide for the Secretary to authorize home-to-work vehicle use for certain job series or positions (e.g., law enforcement personnel);
- specify that authorizations must be based on the increased efficiency and economy of government operations instead of employee comfort and convenience; and
- have similar definitions for the conditions under which employees may be authorized for home-to-work travel, including field work (e.g., work at multiple locations within 1 day) and emergencies.

Two of the four land management agencies—NPS and FWS—issued additional policies and procedures to guide their employees' use of agencies' vehicles for home-to-work travel. These policies are consistent with Departmental policy, and for the most part, the additional guidance regards agency-specific processes.

As mentioned above, the Departments' Secretary can authorize home-to-work travel for certain job series and positions. When such authorizations have occurred, all four agencies have designated field officials who are authorized to approve, on a case-by-case basis, the use of agencies' vehicles for home-to-work travel. For example, the Secretary of the Interior authorized home-to-work travel for special agents and rangers (law enforcement positions) at BLM. According to his June 1993 authorization, the rationale was the

". . . safe and efficient performance of protective services, criminal investigations, intelligence, and law enforcement activities; to include . . . initial response in conjunction with fire and life-rescue services, after-hours standby status or call out duty, investigative readiness, surveillance cover and emergency backup to primary 24 hour patrol operations."

With this authorization, BLM delegated case-by-case authorization to its state directors. Justifications for case-by-case authorizations are generally more specific. For example, the stated rationale for one ranger was that home-to-work travel would (1) provide for rapid response to BLM's priority incidents, (2) maximize field work, (3) reduce overtime costs, and (4) provide for the safety of the employee. The authorization was limited to instances when conditions necessitated placing the employee on on-call status or when an assignment necessitated an early morning departure and/or a late after-hours return. In other instances, the ranger was to secure the agency's vehicle in a locked and fenced federal compound.

This same process may be followed for non-law enforcement home-to-work authorizations. According to other officials, the rationales for such authorizations for non-law enforcement employees were various and included such categories as field work and emergency maintenance. Table IV.1 shows the number of home-to-work vehicle authorizations for law enforcement and other employees.

Table IV.1: Home-to-Work Vehicle Authorizations by Employee Type, as of November 1996

	Number of home-to-work authorizations		
Agency	Law enforcement employees	Other employees	Total
NPS	208	9	217
FWS	247	0	247
BLM	29	0	29
FS	[a]	[a]	[a]

[a]Data were not readily available because, according to agency officials, decision-making and record keeping are decentralized.

Source: Agencies' data; agency officials.

We have previously reviewed issues related to the use of government vehicles for home-to-work transportation. In a 1985 report, for example, we found that federal agencies were not strictly following the applicable statutes.[1] At that time, home-to-work transportation was statutorily

[1]Use of Government Motor Vehicles for the Transportation of Government Officials and the Relatives of Government Officials (GAO/GGD-85-76, Sept. 16, 1985).

precluded, under a 1946 law codified at 31 U.S.C. 1344, except for certain specific officials and employees. But federal agencies' broad interpretations of these home-to-work exceptions resulted in confusion and questionable extensions of these exceptions in the use of government vehicles. In 1986, partly on the basis of our report, the Congress responded by enacting Public Law 99-550, which amended the previous law and established consistent and practical limitations on the use of government vehicles for home-to-work transportation.

In a March 1991 report, we found that agencies were generally complying with the restrictions on home-to-work transportation.[2] We did identify instances where high-level federal officials received home-to-work transportation even though they were not authorized to do so. However, these instances were generally isolated or infrequent occurrences and did not constitute a regular pattern of abuse.

[2]Government Vehicles: Officials Now Rarely Receive Unauthorized Home-to-Work Transportation (GAO/GGD-91-27, Mar. 15, 1991).

Grazing Programs

The grazing programs administered by BLM and FS share certain elements but differ in several ways. Among the similarities is the process by which a citizen applies for and is granted a grazing permit. For both agencies, the process consists of a few key steps: (1) communication between the applicant and the agency, (2) the submission of a completed application form and documents verifying compliance with the basic eligibility requirements, (3) the determination of the applicant's qualifications, and (4) the issuance or denial of the permit and the availability of an appeal process to those who are denied a permit.

The two agencies' programs are also similar in that they both charge the same grazing fees, which are calculated by a formula set in the Public Rangelands Improvement Act of 1978, and both agencies return a portion of the fees to the states. Furthermore, similarities exist in the types of livestock that the agencies allow to graze. According to officials of both agencies, cattle and sheep are the predominant livestock that permittees graze on federal lands. Other types of livestock—such as swine or buffalo—may be considered acceptable, however, as long as the permittee can control them.

Among the programs' key differences are those that exist in the programs' authorizing legislation, in the amount of land and livestock that a permittee must own, and in the transfer of grazing privileges from one person to another. First and foremost, the programs have different authorizations. BLM's primary authority for managing the public lands, including rangelands, is found in the Taylor Grazing Act of 1934, as amended (43 U.S.C. 315). The law was enacted, in part, to stop injury to public grazing lands by preventing overgrazing and the deterioration of soil. Under the act, the Secretary of the Interior was authorized to issue permits to graze livestock on public lands and charge grazing fees. Generally, the Taylor Grazing Act does not apply to grazing on FS lands. Rather, FS' grazing program is authorized by other legislation (e.g., the Organic Administration Act of 1897 and the Granger-Thye Act of 1950).

Differences also exist in the agencies' requirements pertaining to base property (i.e., property that permittees must have to support their grazing operations). FS requires that base property be owned by the permittee, whereas BLM requires that the property be owned or controlled (i.e., leased) by the permittee. Additionally, FS imposes some acreage requirements setting forth the number of acres of private land needed to support the forage needs of the livestock being grazed. The acreage requirements vary among FS units, depending on such things as the climate and the type and abundance of vegetation. BLM, on the other hand, has no acreage requirements.

Finally, differences exist in the conditions under which a grazing permit may pass from one landowner to the next. Under BLM's program, grazing permits are tied to the base property. Under FS' program, in contrast, permits are tied to the individual. Accordingly, grazing permits must be waived or relinquished to FS upon the landowner's death or the land's sale. FS may choose to issue a grazing permit to the subsequent landowner as long as qualification requirements are met but is not legally obligated to do so.

Over the years, we have reviewed various issues related to grazing on federal lands. For example, in a June 1991 report, we compared the existing grazing fee formula with alternatives that had been jointly developed by BLM and FS.[1] We noted that the formula kept fees low enough to promote the economic stability of western livestock grazing operators with federal permits but too low to cover the government's cost of managing the grazing program.

Also, in June 1992 and April 1993 reports, we profiled BLM's and FS' grazing allotments and permits.[2] Included in the profiles was information on the numbers of allotments, the average acreage they encompassed, and the total and average numbers of animal unit months they sustained.[3]

[1] Rangeland Management: Current Formula Keeps Grazing Fees Low (GAO/RCED-91-185BR, June 11, 1991).

[2] Rangeland Management: Profile of the Bureau of Land Management's Grazing Allotments and Permits (GAO/RCED-92-213FS, June 10, 1992) and Rangeland Management: Profile of the Forest Service's Grazing Allotments and Permittees (GAO/RCED-93-141FS, Apr. 28, 1993).

[3] An animal unit month is the amount of forage needed to sustain one cow, one horse, or five sheep for 1 month.

Comments From the Department of the Interior

United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

JAN 23 1997

Mr. Victor S. Rezendes
Director, Energy, Resources and Science Issues
U. S. General Accounting Office
441 G. Street, NW, Room 2240
Washington, DC 20548

Dear Mr. Rezendes:

Thank you for the opportunity to comment on the draft report titled, "LAND MANAGEMENT AGENCIES: Information on Selected Administrative Policies and Practices" (GAO/RCED-97-40).

See comment 1.

See comment 2.

As requested, updated full-time equivalent (FTE) and budget authority information for the Bureau of Land Management and U.S. Fish and Wildlife Service are provided in Enclosure I. The National Park Service (NPS) has completed its revised estimate of the cost to clear the repair, rehabilitation and replacement backlog for employee housing. The revised estimate is $300 million.

See comment 2.

Further, the Department is moving forward with an initiative to identify funding alternatives for the repair, rehabilitation and replacement of employee housing in accordance with the provision of the Omnibus Parks and Public Lands Management Act of 1996 (P.L. 104-33).

If you have any questions about, or need clarification of, these comments, please contact Wayne Howard, Focus Leader, Management Control and Audit Follow-up, at (202) 208-4701.

Regards,

Bonnie R. Cohen
Assistant Secretary
Policy, Management and Budget

Enclosure

The following are GAO's comments on the Department of the Interior's letter dated January 23, 1997.

GAO's Comments

1. We did not incorporate this information in our report because we did not have comparable data for all four agencies.

2. We incorporated this information in our report.

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