

GAO

December 1986

FEDERAL PRODUCTIVITY

Potential Savings From Private Sector Cost Comparisons



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General Government Division

B-223693

December 31, 1986

The Honorable Robert F. Smith
House of Representatives

The Honorable Charles W. Stenholm
House of Representatives

This report responds to your March 6, 1986, letter requesting that we provide a range of cost savings and program preservations that would be possible with the passage of H.R. 3357. (The term "program preservation" means maintaining at least the existing levels of program services' quality and timeliness) H.R. 3357 would require the federal government to contract with the private sector to the maximum extent possible for commercial products and services when they can be procured at lower cost. The intent of the bill is to broadly expand the use of competition and reliance on the private sector to reduce the costs of products and services needed by the government. As agreed with your offices, we developed a range of cost savings based on past analyses of the Office of Management and Budget (OMB) Circular A-76 policy.

OMB Circular A-76 "Performance of Commercial Activities" is the current government policy that requires executive branch agencies to procure commercial products and services from private sector sources when the private sector can accomplish the same quality job at less cost than a government operation. A modified version of Circular A-76 would become law under H.R. 3357 and, if fully implemented in accordance with appropriate contracting procedures and regulations, should result in cost savings while preserving programs, as currently required by A-76 procedures. In 1978 and 1981 we recommended to Congress that a legislated policy was needed to assure that agencies implement A-76 consistently and provide for the appropriate use of federal resources. As agreed with your offices, we are also providing information on OMB's current A-76 implementation policy, our past positions on A-76, and our views on H R 3357 (see app. I).

To provide the requested information, we examined past analyses of the A-76 program. From literature searches we identified five past analyses prepared by various organizations between 1982 and 1986 which provide 10 estimates indicating the range of long-term annual cost savings and program preservations possible after governmentwide implementation of A-76. We did not attempt to verify the 10 savings estimates or the findings of the five analyses To obtain information not available

from the published reports, we interviewed analysts who either prepared or have follow-up duties related to the analyses. We further examined our past reports on A-76 contracting and OMB documents on its current A-76 implementation policy. Our work was performed in accordance with generally accepted government auditing standards during March through May of 1986.

Since 1982, analyses of Circular A-76 have been made by the Congressional Budget Office (CBO), the National Academy of Public Administration (NAPA), OMB, the President's Private Sector Survey on Cost Control (PPSSCC), and the Heritage Foundation that provided long-term cost saving estimates of A-76 if it were implemented governmentwide. The saving estimates ranged from \$500 million to \$4.6 billion (see app. II).

None of these analyses and estimates of A-76 savings fully reflect the specific provisions of H.R. 3357; however, we believe that one OMB estimate comes closest in representing the potential savings from H.R. 3357 which, according to this estimate, could range from \$2 to \$3 billion. Unlike the other estimates, the 1984 OMB estimate assumed an expanded A-76 inventory of activities by including additional commercial positions and did not assume any reduction in existing legislative restrictions on contracting out. Similarly, H.R. 3357 would not remove existing restrictions and would require expanding the inventory of commercial positions. Notwithstanding this potential range of cost savings, one provision of H.R. 3357 should be considered for modification.

We believe that private sector requests for reconsideration of government management decisions about activities considered inherently governmental and not subject to contracting out should be left to executive branch review with congressional oversight of the review process. Such decisions reflect discretionary management functions of executive branch agencies and are more appropriate for executive branch review rather than judicial review in the U.S. District courts as provided for by H.R. 3357.

We also believe that H.R. 3357 would provide for more efficient and effective government operations if it required accountability for cost savings resulting from its implementation. To assure accountability for cost savings, H.R. 3357 should require agencies to specify in their budget requests anticipated and actual cost savings achieved as a result of private sector cost comparisons.

We obtained comments on this report from OMB and it agreed with the report's contents.

As arranged with your offices, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from its issue date. At that time, we will send copies to other interested parties and make copies available to others upon request.

W. J. Anderson

William J. Anderson
Assistant Comptroller General

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Abbreviations

CBO	Congressional Budget Office
DOD	Department of Defense
GAO	General Accounting Office
NAPA	National Academy of Public Administration
OMB	Office of Management and Budget
PPSSCC	President's Private Sector Survey On Cost Control
VA	Veterans Administration

A-76 Policy Relationship to H.R. 3357

Basically, Circular A-76 provides that (1) agencies should generally rely on the private sector for commercial products and services unless it is more economical to provide them in-house and (2) all inherently governmental functions must be performed by federal employees. The circular's implementation guidelines require agencies to (1) identify in-house commercial activities, (2) determine each activity's standards of performance, (3) review the efficiency of the in-house organization, (4) compare the cost of the most efficient in-house organization with private sector bids to perform an activity in accord with the standards, and (5) select the lower cost alternative to perform an activity. Implementation of the circular has been shown to reduce government costs and preserve programs regardless of who ultimately provides the necessary products and services. H.R. 3357 would modify OMB's current A-76 procedures as indicated in table I.1.

Table I.1: Major Differences Between Current A-76 Policy and H.R. 3357

Current A-76 Policy	H.R. 3357
Ten percent conversion differential is added to the cost of contracting to account for conversion costs	No conversion differential
Indirect (overhead) cost of the in-house organization is determined using incremental costing wherein only the cost of each position that would be eliminated by converting to contract is calculated	Government indirect costs would be computed on the same fully allocated basis as is required of government contractors
Government management decisions that certain activities are inherently governmental and therefore not subject to contracting out are not reviewable ^a	Private sector could request reconsideration of decisions that certain activities are inherently governmental by the Administrator, Office of Federal Procurement Policy, and judicial review in the U.S. District Courts

^aAlthough A-76 provides no right of review of such government management decisions, we make a review of A-76 cost comparisons in specific circumstances. Under our procurement protest procedures, we will review A-76 cost comparisons where there is an allegation that an agency failed to comply with established ground rules for comparing the cost of in-house performance with offers received. We engage in this review because it would be detrimental to the procurement process if, after the agency solicited offers, there was a faulty or misleading cost comparison that materially affects the procurement process. However, as pointed out by OMB (see app. IV), the provisions of A-76 dealing with cost comparisons and those pertaining to agency management decisions on activities "inherently governmental" are not the same and should not be confused.

Expanding the A-76 Program

Since 1955, the executive branch has had a policy that agencies should rely on the private sector for needed goods and services. The policy, however, has not been effectively implemented because it was widely perceived as a government contracting out program and a threat to the job status of federal managers and workers. Rather than continue to mandate contracting out for services being provided by federal

employees, OMB revised Circular A-76 in August 1983 to require federal managers to find the most effective and efficient way of providing services in-house and to compete with private sector bidders when appropriate. This change was intended to assure selection of the most economical means of obtaining commercial products and services and to provide fair treatment for affected federal employees.

In September 1984, the Deputy Director, OMB, testified before the Subcommittee on Human Resources, House Committee on Post Office and Civil Service, that after 3 decades of poor compliance by the agencies, OMB was refocusing the A-76 program as a means of enhancing federal productivity. Also in September 1984, OMB announced changes to its A-76 implementation policy to achieve the productivity objective. OMB integrated the A-76 program into the Administration's Reform 88 management improvement effort. OMB designated 14 categories of commercial activities for the agencies to emphasize in the A-76 cost competitions. By designating these categories, OMB intended to accelerate the process of identifying individual activities for study under A-76. OMB also required that agencies conduct management efficiency reviews of activities exempt from the cost competitions. These efficiency reviews involve preparing an activity's work standards and a study of the in-house organization, but do not include a cost comparison with private sector bidders. The requirement for the management efficiency reviews was based on a 1981 GAO report¹ that recommended the A-76 guidelines be expanded to include activities exempt from contracting out to achieve greater cost savings.

In February 1986, OMB announced a proposal that certain activities be designated for direct conversion to contract without requiring full A-76 cost studies. These would be activities that are consistently performed more cost effectively by the private sector nationwide. This proposed change was designed to accelerate the achievement of budgetary savings and to concentrate the agencies' A-76 study efforts on those activities that can benefit the most from formal cost studies.

Our Positions on A-76

Notwithstanding OMB's recent initiatives on A-76, we believe that widespread and effective implementation of the A-76 policy will be difficult to achieve without a legislated policy for the government to rely on the private sector for commercial products and services. In 1978 and 1981

¹Expanding the Efficiency Review Program for Commercial Activities Can Save Millions (FPCD-81-77, Sept 30, 1981)

we recommended to Congress that a legislated policy was needed to assure that agencies implement A-76 consistently and provide for the appropriate use of federal resources. A list of relevant reports is provided in appendix III.

Although our reports indicate that the A-76 policy is effective in providing cost savings, we have not specifically determined the extent to which A-76 would allow the government to preserve levels of service in a budget reduction environment. Four of our reports concluded that for the A-76 cases reviewed, savings were usually realized even though start-up problems often occurred.² The savings were generally attributed to contractors using fewer employees and paying lower wages. Those reports, however, reviewed individual activities contracted out under A-76, rather than the A-76 program's overall savings and program preservation potential. In a period of budget reductions, such as stipulated by the Balanced Budget and Emergency Deficit Control Act of 1985, any savings from A-76 may not be realized fully or quickly enough to avert any targeted program reductions. During such a period, however, applying the A-76 efficiency guidelines should help preserve program service levels by improving in-house efficiency.

Our Views on H.R. 3357

A legislated national policy of reliance on the private sector would encourage broader and more consistent implementation of the OMB Circular A-76 policy. Even though A-76 contracts often involve start-up problems, our past evaluations generally showed that A-76 implementation resulted in cost savings while preserving services. If enacted, H.R. 3357 would provide the recommended national policy and also should result in cost savings and program preservations if fully implemented in accordance with appropriate contracting procedures and regulations. We believe, however, that one provision of H.R. 3357 should be considered for modification.

We believe that private sector requests for reconsideration of government management decisions about activities considered inherently governmental and not subject to contracting out should be left to executive branch review with congressional oversight of the review process. Such decisions reflect discretionary management functions of executive

²DOD Functions Contracted Out Under OMB Circular A-76 Contract Cost Increases And The Effects On Federal Employees (NSIAD-85-49, Apr 15, 1985), Review of DOD Contracts Awarded Under OMB Circular A-76 (PLRD-81-58, Aug. 26, 1981), GSA's Cleaning Costs Are Needlessly Higher Than In The Private Sector (AFMD-81-78, Aug 24, 1981); Factors Influencing DOD Decisions To Convert Activities From In-House To Contractor Performance (PLRD-81-19, Apr 22, 1981)

branch agencies and are more appropriate for executive branch review, rather than judicial review in the U.S. District courts as provided for by H.R. 3357.

We also believe that H.R. 3357 would provide for more efficient and effective government operations if it required accountability for cost savings resulting from its implementation. To assure accountability for cost savings, H.R. 3357 should require agencies to specify in their budget requests anticipated and actual cost savings achieved as a result of private sector cost comparisons. As we stated in 1983 regarding productivity management in the government³ agencies should specify expected future and actual results from productivity improvement efforts in the President's budget.

³Increased Use of Productivity Management Can Help Control Government Costs (AFMD-84-11, Nov 10, 1983)

Past Analyses of A-76 Savings

Since 1982, five analyses of the OMB Circular A-76 program have been made that provide 10 estimates of long-term annual savings if A-76 were implemented governmentwide. The estimates are long-term because (1) they exclude short-term costs that are incurred by the government in converting activities to contractor performance, such as loss of productivity and disruption of service, and (2) they include retirement savings that would materialize many years after conversion to contract. The estimates, shown in table II.1, were made by the Congressional Budget Office (CBO), the National Academy of Public Administration (NAPA), the Office of Management and Budget (OMB), the President's Private Sector Survey on Cost Control (PPSSCC), and the Heritage Foundation.

The estimates differ primarily because of different assumptions regarding the number of white collar, commercial-type positions that would be studied under A-76 and converted to contractor performance. OMB's savings estimate of \$2 to \$3 billion per year after A-76 implementation governmentwide was based on an expanded inventory of commercial-type positions that would be subject to A-76 procedures. In addition to 226,000 largely blue-collar positions, OMB expanded the inventory to include white-collar positions that at the time were not considered in federal agencies' inventories of activities covered by A-76. This change raised the inventory to include 418,000 federal commercial-type positions. OMB further excluded from its estimate commercial-type positions restricted from A-76 contracting out. CBO's estimates, in contrast, focused mostly on blue-collar positions. The NAPA estimate included positions restricted from contracting out and also did not include additional white-collar positions identified in OMB's expanded inventory. The PPSSCC's Personnel Management Task Force estimate focused on the universe of blue-collar positions identified in OMB's 1984 inventory of commercial activities. The PPSSCC's Management Office estimate, although assuming removal of the 10 percent conversion differential, also assumed reduction of existing restrictions from contracting out and the actual costs of in-house performance of activities would be compared to contracting costs. The Heritage Foundation estimate included the positions restricted from contracting out and the Postal Service in the universe of commercial-type positions subject to A-76.

Table II.1: Estimates of Long-Term Annual Savings With A-76 Implemented Governmentwide

Analysis(year)	Savings (billions of current dollars)	Full-time commercial-type positions	Positions converted to contract
CBO (1982)			
I	\$0.9	202,000 ^a	165,000
II	\$0.9	202,000 ^a	135,000
III	\$1.2	495,000	185,000
IV	\$0.5	202,000 ^a	95,000
NAPA (1983)	\$1.0	500,000	^b
OMB (1984)			
1984 Inventory	\$1.0	226,000 ^a	113,000 ^c
Expanded Inventory	\$2.0-3.0	418,000 ^a	209,000 ^c
PPSSCC (1984)			
Personnel Management Task Force Management Office	\$1.0	^b	132,644
	\$4.6	500,000	400,000
Heritage Foundation (1986)	\$3.0	1,000,000	500,000 ^c

^aExcludes about 300,000 positions exempt from A-76

^bNo figure provided in cited report

^cData obtained from reporting organization, but not included in the published report

Congressional Budget Office

In 1982, CBO made a study of the potential savings that could be achieved from contracting out for support services.⁴ CBO examined four options for A-76 contracting out and estimated long-term savings that would be fully realized decades after implementation. CBO's estimates of savings under these four options ranged from \$500 million to \$1.2 billion per year.

- Option I: Maintain OMB's current 1982 A-76 program as promulgated in a draft revised circular. Under this option 165,000 positions in commercial activities would convert to contract with savings of about \$900 million annually.
- Option II: Modify OMB's cost comparison guidelines to recognize fully the costs of retirement and federal employee layoffs. The retirement cost factor that is added to the in-house cost would be periodically adjusted to reflect federal retirement costs and a new factor to account for federal layoff costs would be added to the cost of contracting. Since the layoff costs were assumed to be larger than the increase suggested for

⁴Contracting Out for Federal Support Services: Potential Savings and Budgetary Impacts (Congressional Budget Office, Oct. 1982)

retirement costs, the net effect would shift the cost comparisons in favor of in-house performance. This would result in 135,000 positions converting to contract with savings of about \$900 million annually.

- Option III: Reduce legislative restrictions on contracting out by the Department of Defense (DOD) and the Veterans Administration (VA). Reducing the restrictions would add 50,000 federal positions to the 135,000 converted to contract under Option II resulting in 185,000 positions converted to contract and savings of \$1.2 billion.
- Option IV: Maximize near-term savings by limiting conversion to contract only to those cases in which cash payments under contracting out are lower than current outlays for in-house performance. Determinations would have to be made of which conversions would result in immediate budget savings from contracting out. Other conversions that would result in short-term increases in budget outlays, but would provide savings at some later time, would not occur. By focusing on near-term savings, 95,000 positions would convert to contract and result in savings of \$500 million annually.

In subsequent annual reports on reducing the deficit, CBO indicated that with an expanded program of contracting out, which relaxed the restrictions on DOD and VA, the government would eventually spend at least \$1 billion less per year on compensation costs. CBO, however, cautioned that near-term savings may be small due to retirement and conversion costs.

CBO's A-76 savings estimates were based on differences in employee compensation costs for private and federal workers. CBO compared the unit labor costs, including wages and benefits, for 15 commercial, mostly blue-collar, occupations in 18 geographic areas. The results were projected to OMB's estimate of the federal civilian work force subject to its Circular A-76 policy under the four options. According to the CBO analyst who prepared the 1982 report, the results of the analysis would be different if done today because of A-76 program changes, changes in the differences between federal and private wages for the affected occupations, and because of the government's accumulated experience with the A-76 program since 1982 upon which additional analysis could be based. CBO is presently updating its estimates of potential savings from the A-76 program.

National Academy of Public Administration

In 1983, the National Academy of Public Administration as part of a larger study of federal management⁵ estimated that OMB's Circular A-76 procedures could generate \$1 billion or more per year in savings. NAPA identified 11,000 commercial and industrial activities being performed by the government costing \$19 billion and employing 500,000 federal workers which could be performed by the private sector. NAPA estimated that, even with the existing restrictions on contracting out, if half of the activities were studied under A-76 with savings of 10 to 15 percent, \$1 billion would be saved annually. NAPA recognized the productivity enhancement benefits possible from the A-76 study process and considered A-76 a fair means of deciding on who should perform commercial activities for the government. It recommended that implementation of A-76 be accelerated in order to realize A-76's productivity savings potential.

Office of Management and Budget

In a 1984 A-76 program progress report, OMB estimated that governmentwide implementation of A-76 would result in savings exceeding \$1 billion per year.⁶ The report emphasized A-76's savings potential and the A-76 program's objective to improve government management and productivity through fair competition.

OMB's estimate of savings from A-76 was based on an inventory of commercial activities costing \$6 billion and employing 226,000 federal workers. With prior A-76 competitions resulting in average savings of 20 percent, OMB calculated that potential savings from A-76 would exceed \$1 billion. Excluded from the inventory, however, were another \$14 billion of commercial-type activities that were restricted from contracting out for national defense and patient care purposes.

OMB further considered A-76's savings potential if the scope of commercial activities were to be expanded. OMB noted that the \$6 billion inventory was focused primarily on blue-collar positions and did not include many white-collar, commercial-type positions such as engineering, training, and computer operations. Its preliminary estimates showed that if the white-collar commercial activities were included in agency A-76 inventories, then the total A-76 inventory would double in size. This

⁵Revitalizing Federal Management Managers and Their Over Burdened Systems (A panel report of the National Academy of Public Administration, Nov 1983), Deregulation of Government Management, Federal Procurement Interim Report (National Academy of Public Administration, Mar 1983)

⁶Enhancing Governmental Productivity Through Competition Targeting for Annual Savings Of One Billion Dollars By 1988 (Office of Management and Budget, Office of Federal Procurement Policy, Mar 1984)

expanded inventory would encompass activities costing \$10 to \$15 billion to perform in-house and employing at least 418,000 federal workers. OMB estimated that the expanded inventory could provide annual savings ranging from \$2 to \$3 billion.

More recently, in its report Management of the United States Government, Fiscal Year 1987,⁷ OMB estimated that its commercial activities review schedule would result in annual budget savings among the nondefense agencies of \$369 million by the end of fiscal year 1991. Those savings would come from both the A-76 cost comparisons and efficiency reviews of commercial activities performed in-house by federal employees. The military departments and defense agencies were not included in OMB's estimate because under current budget procedures they are permitted to reprogram any savings from their A-76 commercial activities and efficiency review programs.

PPSSCC

Also in 1984, the President's Private Sector Survey on Cost Control (PPSSCC) concluded its study of federal government management and operations. Six of the PPSSCC's 36 functional task forces reiterated the A-76 program's savings potential and made estimates of savings from A-76 within their respective functions. The commission later found the task forces' estimates to be partly duplicative. The Task Force On Personnel Management and the PPSSCC's Management Office, however, made estimates of potential annual savings from A-76 after it was implemented governmentwide.

The PPSSCC's Task Force On Personnel Management based its estimate of A-76 savings on data provided by OMB. The task force estimated that governmentwide implementation of the policy would reduce the federal budget by about \$1 billion annually by eliminating 132,644 federal positions.⁸

The PPSSCC's Management Office took a broad view of the A-76 implementation and estimated annual savings of \$4.6 billion.⁹ The office estimated that after 5 years 400,000 out of 500,000 positions in commercial

⁷Management of the United States Government, Fiscal Year 1987, Executive Office of the President, Office of Management and Budget (U.S. Government Printing Office, Feb. 1986)

⁸President's Private Sector Survey On Cost Control, Report on Personnel Management (U.S. Government Printing Office, Nov. 1983)

⁹President's Private Sector Survey On Cost Control, Report on Management Office Selected Issues Volume X, Opportunities Beyond PPSSCC (U.S. Government Printing Office, Jan. 1984)

activities would be contracted out. To achieve this level of conversions, it assumed that restrictions prohibiting contracting for support services in the DOD, VA, and the General Services Administration would be removed and that OMB's cost comparison procedures would be relaxed.

The changes in cost comparison procedures would involve (1) using established actual costs of in-house performance, rather than estimates developed in a management efficiency study and (2) eliminating the 10-percent differential used to account for loss of productivity and disruption of service while converting an activity to contractor performance. The office further assumed a 20-percent efficiency gain for the activities that remained in-house as a result of competition with the private sector.

Heritage Foundation

In 1986, an additional estimate of savings from OMB Circular A-76 was made by the Heritage Foundation as part of a larger study of proposals for reducing the federal deficit¹⁰. The foundation estimated that an expanded, reformed A-76 program would save \$3 billion per year. The foundation estimated that 1 million federal employees, including postal workers, were engaged in commercial activities which would be subject to A-76 competitions. The foundation recommended stricter implementation of A-76, removal of restrictions from the Department of Defense, modifying the cost comparison procedures, and independent oversight of the A-76 process. As a result of these changes, Heritage estimated that 500,000 positions costing \$10 billion would be converted to contract with savings of 30 percent or \$3 billion per year after conversion, retirement, and other one-time costs were accounted for.

¹⁰Slashing the Deficit, Fiscal 1987 (Washington, D C.. The Heritage Foundation, Jan. 1986).

List of Relevant GAO Reports

Title	Date	Publication number
<u>Development Of A National Make-Or-Buy-Strategy— Progress and Problems</u>	9/25/78	PSAD-78-118
<u>Factors Influencing DOD Decisions To Convert Activities From In-House To Contractor Performance</u>	4/22/81	PLRD-81-19
<u>Civil Servants And Contract Employees Who Should Do What For The Federal Government</u>	6/19/81	FPCD-81-43
<u>GSA's Cleaning Costs Are Needlessly Higher Than In The Private Sector</u>	8/24/81	AFMD-81-78
<u>Review Of DOD Contracts Awarded Under OMB Circular A-76</u>	8/26/81	PLRD-81-58
<u>Expanding The Efficiency Review Program For Commercial Activities Can Save Millions</u>	9/30/81	FPCD-81-77
<u>Increased Agency Use Of Efficiency Guidelines For Commercial Activities Can Save Millions</u>	9/30/81	FPCD-81-78
<u>Synopsis Of GAO Reports Involving Contracting Out Under OMB Circular A-76</u>	5/24/83	PLRD-83-74
<u>Increased Use Of Productivity Management Can Help Control Government Costs</u>	11/10/83	AFMD-84-11
<u>Compendium Of GAO's Views On The Cost Saving Proposals Of The Grace Commission, Vol II - Individual Issue Analyses, pp 229-230</u>	2/19/85	OGC-85-1
<u>DOD Functions Contracted Out Under OMB Circular A-76 Contract Cost Increases And The Effects On Federal Employees</u>	4/15/85	NSIAD-85-49
<u>Information From Previous Reports On Various Aspects Of Contracting Out Under OMB Circular A-76</u>	7/5/85	NSIAD-85-107

Comments From the Office of Management and Budget

Note Our comment is discussed on page 6 of this report



EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
WASHINGTON, D.C. 20503

DEC 16 1986

Mr. William J. Anderson
Assistant Comptroller General
U.S. General Accounting Office
Washington, D.C. 20548

Dear Mr. Anderson:

Thank you for your letter of December 1, 1986, allowing the Office of Management and Budget to review and comment on the GAO draft report entitled "FEDERAL PRODUCTIVITY: Potential Savings -- from Private Sector Cost Comparisons."

We concur with the report's findings and have only one comment. We do not believe that the footnote at the bottom of page 7 is necessary in the context used. The A-76 policy that the footnote refers to states that there is no review of agency management decisions to declare activities inherently governmental and therefore, not subject to competition with the private sector. The footnote states that GAO will review the results of A-76 cost comparisons if there is an allegation that an agency failed to comply with the established A-76 rules. The two policies for review are not the same and the footnote could lead to some confusion.

Your letter proposed a meeting to discuss OMB's comments; I do not believe that is necessary due to our agreement with the report. Thank you again for allowing OMB to comment.

Sincerely,

A handwritten signature in cursive script that reads "Dennis C. Boyd".

Dennis C. Boyd
Acting Associate Director
for Management

Now on p 6

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