

## HR ISSUES TO BE ADDRESSED DURING THE JULY 23<sup>rd</sup> HR/COMPETITIVE SOURCING CONFERENCE

These questions were developed by an HR competitive sourcing working group. Many of the questions do not have a single correct answer and I have responded with ideas so that others could challenge them and continue needed dialogue. Where I have indicated references in bold face text, I am referring to items in the book *The Human Resources Role in Managing Organization Change*, FPMI Communications, Inc. that contains additional information. Tom Kaplan

BEFORE	
QUESTION/ISSUE	IDEAS TO CONSIDER
1. How does competitive sourcing tie in with Workforce Planning, Human Capital, and the President's Management Agenda?	One green scorecard criteria for Strategic Management of Human Capital states, "Changes in agency workforce skill mix and organizational structure reflect increased emphasis on e-government and competitive sourcing." This indicates that competitive sourcing must consider (be part of the solution for) achieving improvement in skill mix and organization structure. An approach to achieve this might involve determining the agency's core and non-core activities, evaluating the risks and benefits associated with competing non-core activities, and selecting candidate activities for competition.
2. Are we using Competitive Sourcing to support the Agency's Restructuring Plan? For example, several of the goals of restructuring are to reduce headquarters positions, delayer, and delegate authorities to the field. Are we using CS for this, or just using CS to compete support and lower graded positions?	Competitive sourcing (CS) could contribute to agency restructuring/modernization/etc., if used strategically to reduce and delayer organizations although this would require careful planning and execution. Often, a full cost comparison effort may take between 18-36 months to complete and, if used to achieve an agency's restructuring plan, may delay its timely implementation.
3. Civilian agencies are responsible for consulting with national unions. When is the best time to do this—before or after bureau plans can be approved?	A general dialogue should be in progress between labor and management prior to receiving approved plans to build trust and keep the parties informed. This effort should continue throughout the CS process. <b>See Task 1-D</b>
4. Civilian agencies do not have any legal requirement to notify Congress of the intent to study, but if the agency chooses to do so, what are some recommendations for doing such?	Courtesy announcement to congressional representatives of a pending CS effort is a good idea as this can avert later (unwanted) inquiries. For other milestones in the CS process, Congress usually has an interest at initial and final award.
5. What is the best way to communicate with employees in the competitive area who may ultimately be affected although they are not in a study area (e.g., they may be affected by the RIF bumping and retreating and may be the ones to lose their jobs, not those in the study areas)?	Agency/bureau-wide voice messages and email messages have been done at some agencies/bureaus to inform employees. Other methods include publishing intranet-based FAQs and conducting workforce briefings/town hall meetings.

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6. How do position descriptions relate to the FAIR [Act] Inventory?	If the PDs are accurate and up to date they could be used to determine whether positions are commercial activities (CA) and/or inherently governmental (IG) (some positions may contain both). If positions comprise multi-functional duties, PDs could be used as a basis to allocate FTE across function codes in the inventory.
7. The FAIR [Act] Inventory is based on functions not positions. Therefore, 1 position may have 4 functions and thus be reported 4 x .25 times on the FAIR [Act] Inventory.	This might be the case if a position is multi-functional in nature (e.g., a position containing a combination of duties). Also, some positions may contain both CA and IG duties, which would require fractional FTE reporting.
8. What if management wants to code individual position descriptions as Inherently Governmental or Commercial (e.g., management wants to use an automated system to immediately find out which employees are inherently governmental and which are commercial)? There are very few jobs that are pure either way as some of the position's functions might be commercial and some might be inherently government. In addition, identification of such is not part of the Federal classification system.	It might be best to simply identify the general conditions that would make certain positions subject to IG duties (e.g., purchase cardholder, policy-making, etc.). While most positions will not be 100 percent IG, this would help identify those positions that contain IG duties.
9. Is preparing the inventory an HR, AQM, Budget, or Competitive Sourcing Center responsibility? Why?	This varies from agency to agency.
10. Is HR involved in selecting activities to study? If so, how? If not, why not?	This varies from agency to agency.
11. How do we handle diversity issues? Many of the areas identified for study will impact our demographics.	It is prudent to address this issue when developing competition plans. <b>See the gray box on page 47</b>
12. What if employees are on outdated position descriptions? When is the best time to update them?	PDs should be revised any time conditions warrant their update (e.g., publication of revised classification standards, significant change in duties, etc.). <b>See Tasks 3-A and 4-B</b>
13. When is the best time to ask employees to submit updated resumes and check their OPFs?	Employees should be reminded that it is their responsibility to update their resumes/SF-171s/OF-612s at least every six months as a normal part of their federal employment.
14. When is the best time for HR to review OPFs and ensure submission of latest performance appraisals?	This may be done upon announcement of competition and again prior to conducting RIF. <b>See Task 2-E</b>
15. In the competitive sourcing process, should there be any differences between Headquarters HR roles and responsibilities and those of field personnel offices?	At some agencies, headquarters HR perform an advisory/coordination role. Field offices, since they represent the activity undergoing CS, often provide direct support to the effort.

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16. What training is needed for HR specialists? Do headquarters HR specialists get different training than field HR specialists?	HR specialists should receive the same training regardless of their organizational placement if they will be involved in the CS effort. HR training in CS is available from the commercial consulting community.
17. If HR is picking up new responsibilities, are agencies adding HR positions, or just handling the workload with current staff?	The responsibilities for HR under CS are nearly the same as always except there will be renewed interest in HR's role. HR has a very important role to play during CS and agencies must understand that HR will likely experience an increased demand while supporting CS efforts.

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<p>18. The A-76 process already starts out on an un-level playing field: A contractor can pick specific people and market them when trying to get contracts with agencies (for instance, Jane Doe may have a great reputation in the field. The contractor can appoint Jane Doe as the project manager and handpick specific people on the project, thus increasing the chances of the company being awarded the contract. It does not seem that Federal agencies can design the MEO workforce as they would like – with the best, most qualified people, hand-picked. The Federal agency is stuck hiring people in the MEO via the RIF process which means that it cannot pick who should be in the MEO. The MEO staff would be comprised of whoever had RIF rights.</p> <p>Private sector companies can pay whatever they want. When hiring people from outside the Federal Government, the agency can only pay the person the step 1 of the grade unless it meets all this restrictive criteria for a superior qualifications appointment (e.g., extensive recruitment, not many minimally qualified people, etc.) These criteria are very difficult to meet in many occupations because there may be a number of minimally qualified candidates available, but they are not the brightest or the best and the MEO may want a specific candidate for a variety of reasons. Thus, we might have a difficult time hiring people from the public sector into a function that requires continuous competition in order for the employees to retain their jobs. In addition, when transferring people from other agencies, we can only pay them at the step they were on at the other agency – we cannot increase steps upon transfer. So, it might be difficult for us to hire great people into a competitive MEO from other agencies where they were working in secure areas at the same pay. There is no incentive for these people to leave a secure environment to come work in an unstable environment/function that will be competed again and the employees might lose their jobs.</p>	<ul style="list-style-type: none"> <li>• A MEO can and often will win the competition, pass their annual post-MEO review, and sustain itself throughout as many as five performance periods by applying RIF procedures. Remember, a commercial bidder must pay for exceptional talent and this will be reflected in their bid price.</li> <li>• If there is concern about staffing the MEO with employees with superior qualifications, then management and HR must design position descriptions, performance plans, crediting plans, etc. and recruit for the best and brightest. Doing so may cause the MEO's bid to be increased due to added recruitment and salary costs, but this is one way to attract needed talent.</li> <li>• The MEO's bid price may include cash awards and these can be used as incentives to attract and retain staff. Building career ladder positions in the MEO is also a prudent approach to attracting and retaining staff.</li> <li>• Additionally, one of the important roles HR should play in the CS process is to help management counsel poor performers and provide them opportunities to improve so if assigned to the MEO they will contribute to the MEO's successful operation.</li> </ul>

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<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
<p>Private sector companies can offer bonuses, incentives (cars, stock options, etc.). The Federal Government cannot</p> <p>Private sector companies can hire on the spot whoever they want – period. The Federal Government’s hiring process is time consuming, ineffective, and managers can’t just hire who they want – they have to abide by a zillion Federal employment laws and regulations and the people they want to hire might not even be within reach to employ because of veteran preference laws, ratings, etc.</p> <p>Private sector companies can remove people for poor performance just like that or lay people off when they are not contributing to productivity and profit. The Federal Government doesn’t work like that – managers have to jump through hoops to discipline employees and there are so many other rules and appeal rights that it’s difficult to fire someone. So, the MEO is stuck with the people who may be performing at the minimum level required, but who aren’t the brightest or the most competitive.</p> <p>Private sector companies promote people whenever they want to or increase their pay. The Federal Government has to abide by Federal classification, pay, and time-in-grade restrictions.</p> <p>So, all of these Federal personnel rules, laws, and regulations make it extremely difficult for the Federal agency to compete with private sector companies. How does an agency deal with this?</p>	
<p>What happens if a position that performs the function 25% of its time or more is missed from the inventory and is not included. Then, after the study, the function is no longer to be performed, and is taken away from that position?</p> <p>What happens if a position/function is not included on the inventory?</p> <p>What happens if a position is performing a function 25% of the time, this is accidentally not included on the inventory, the function ends up no longer being performed by that position, but the function being performed 25% of the time by that position happened to be the grade controlling factor? Is the person downgraded? What happens in this situation? What can happen to position grades overall during this process even if the positions stay in the agency but might not be performing certain functions anymore?</p>	<ul style="list-style-type: none"> <li>• If a position/function is not included in the inventory, and is discovered as missing prior to announcement or during a competition, the function should be amended to the inventory.</li> <li>• Prior to actual announcement for competition, someone should review activity FTE to verify inclusion or exclusion from the competition and assess the need for grade re-determination if the grade-controlling factor is no longer valid.</li> </ul>

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<b>DURING</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
19. What is meant by Part I (G) of the OMB Supplemental Handbook that says "At the earliest possible stages of development, consistent with procurement and conflict of interest requirements, affected parties will have the opportunity to fully participate in the development of supporting documents and proposals, including the development of performance standards, performance work statements, management plans, and the development of in-house, and contrast cost estimates." What role does the local union play on the competitive sourcing teams? Can the local union serve as MEO teams? If so, does the union representative also have to be an employee in the area being studied or can he/she be from outside the area?	This varies from agency to agency.
20. What is HR's role on the individual CS teams?	Usually to act as a consultant and an advisor to the CS team.
21. What firewall issues need to be addressed (e.g., the same employees cannot be on the MEO and PWS team, etc.)	This varies from agency to agency.
22. Are HR specialists required to sign confidentiality statements? How do ethics, post-employment, and procurement regulations and laws apply to HR specialists?	All CS team members should sign confidentiality statements and should receive an ethics briefing.
23. What are some options for staffing a functional area while it's under study? While conducting a study, how would managers handle personnel actions in the study area (e.g., filling positions; making promotions – career ladder or other; giving awards; detailing people into/out of the study area; reassigning people into/out of the study area)?	The principle guiding personnel actions during a CS effort should be to stabilize activity operations as much as possible while trying to minimize unwanted RIF. <b>See Task 2-B</b>
24. What is the best way to handle people prematurely leaving? Although the MEO has a chance of winning, many employees may choose to leave the agency early because they are not sure if the MEO will win or they have heard that even if the MEO wins, personnel cuts may be required.	With all agencies now facing CS, the likelihood of leaving one agency and moving to another continues an employee's chance of being affected by announcement of a CS effort at their new organization.
25. Can reorganizations be conducted in the study area while the study is going on?	Reorganization can occur during a CS effort although this is not a prudent management practice and would be disruptive to the effort.
26. Can the specification for PWSs include any diversity requirements?	No since the PWS only establishes work requirements.
27. Can the PWS state that the contractor must hire a specific number of Federal employees?	See the response for 26.

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<b>DURING</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
28. Are there any special HR provisions that need to be made for Interservice Support Agreements?	<ul style="list-style-type: none"> <li>• ISSAs, Memoranda of Agreement/Understanding, Executive Agency Agreements, etc. should be reviewed to determine HR impacts arising from contract award to a commercial or ISSA provider.</li> <li>• Additionally, if an ISSA provider wins a competition, and affected Federal employees are hired by the ISSA provider, actions such as transfer of OPFs and pending HR actions should be coordinated with the losing and gaining activities as part of transition. <b>See Tasks 5-A through 5-D</b></li> </ul>
29. Is the development of the MEO an HR, AQM, Budget, or Competitive Sourcing Center responsibility? Why?	This will vary from agency to agency. Usually, the responsibility for developing the MEO is the CS team with HR, AQM, and the budget office assisting.
30. What is HR's role in developing and classifying position descriptions for the MEO?	This is probably the paramount role HR plays in the formation of the MEO. An approach to MEO position classification might include having a classification specialist review the PWS, determine required skills, apply classification standards, and determine appropriate series and grade. <b>See Task 4-A</b>
31. Is the development of the Transition Plan an HR, AQM, Budget, or Competitive Sourcing Center responsibility?	See the response to question 29.
32. Since competitive areas need to be in place for 90 days prior to the RIF effective [date] and since civilian employees are entitled to a 60-day RIF notice, how can the Transition Plan be written to allow for this time?	Usually, the time requirement for RIF execution is included in the Transition Plan. Example: Consider a minimum of 90 days for establishment of a competitive area and an additional period of 60 days for RIF. The total time would be 150 days. It is not uncommon to incur a period of 180 days to accommodate the many actions required for transition. <b>See Task 5-D</b>
33. Are HR activities (mock RIF, handling of surplus employees, Requesting authorities) an HR, AQM, Budget, or Competitive Sourcing Center responsibility? Why?	These activities are usually an HR responsibility with coordination with the budget office and CS team staff. <b>See Task 4-C</b>
34. HR can conduct mock-RIFs projecting if the contractor wins (because that's one known end product that can be planned for). But how can HR conduct mock-RIFs that project the MEO wins when the MEO is sealed until the contract award is announced? How is HR supposed to plan when it doesn't even know what to plan to?	This is why it is important to have an HR specialist assigned to the management plan (MEO) team; to be able to determine what RIF impacts will occur if the MEO specifies changed staffing requirements.

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<b>AFTER</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
<p>35. After the MEO is in place, would an agency make permanent appointments into the MEO or would it make temporary and term appointments? Problem – MEOs need to be recompeted every 5 year. Temporary appointments are made for 1 year or less and can only be extended for an additional 1 year – up to a 2-year maximum. (And, employees do not receive benefits; all they get is health insurance eligibility after the 1<sup>st</sup> year if they pay not only their share, but also the Government’s share and a 2% administrative fee.) Term appointments are made for 2 years and can only be extended for an additional 2 years – 4-year max. So, already an MEO would be short one year of a worker if it made a term appointment and 3 years short if it make a temporary appointment.</p>	<p>If the MEO is properly designed, it will specify how many FTP/PTP/RPT/IPT/Temp positions are needed. Building a MEO to compete effectively and sustain itself involves many things including proper series and grade classification, staffing mix, adjustment for seasonal variation in workload, etc. <b>See Task 4-A</b></p>
<p>36. How does an agency handle recruitment into the MEO? Would it be better to put on the vacancy announcement that the position is in an MEO that may be studied again in 5 years or to discuss such during the interview? Should employees newly hired into the MEO be required to sign a Conditions of Employment or Statement of Understanding?</p>	<p>A Most Efficient Organization should operate on the basis of fact and vacancy announcements should state known employment conditions.</p>
<p>37. How is the MEO staffed if it wins? Can the MEO pick and choose who they want to hire (e.g., reassignments, announcing merit promotion vacancies) or does the MEO have to be staffed via RIF procedures?</p>	<p>Typically the MEO is staffed based on RIF rules. See the response to question 18 for additional information.</p>
<p>38. (1) Are the MEO staff treated any differently than the rest of the agency’s civilian workforce? (2) Can people be reassigned into and out of the MEO? (3) What if someone doesn’t want to be placed in the MEO?</p>	<p>(1) They should be treated the same. (2) Yes, but frequent reassignment into and out of the MEO may cause unwanted disruption if it occurs too frequently. (3) Declining assignment to the MEO could be granted however this should be supported by a consistent application of decision rationale (i.e., an employee within six months of retirement, etc.).</p>
<p>39. With contracts, if the agency wants to add work to the private sector consultant that was not included in the situation, a contract amendment is negotiated and the agency pays more money. However if the MEO wins, no contract is signed. How would the MEO handle the situation of management increasing their workload? Can management assign the MEO additional work or would they have to re-negotiate if that additional work was not included in the PWS?</p>	<p>Management can assign the MEO added workload however management should adjust (increase) resources to accommodate the change.</p>

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<b>AFTER</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
40. (1) Does the MEO become its own competitive area after it's implemented? (2) Should the head of the MEO have his/her own personnel and budget authorities and should the MEO be a separate organizational entity and appear as such on official agency organization charts?	(1) Not automatically unless the competitive area was limited to the MEO prior to its implementation: To limit the MEO to only itself could incur recruitment costs that might exceed the MEO's bid price, which might cause the MEO to fail its post-MEO audit. (2) The head of the MEO should receive budget authority covering a) The MEO's bid price, b) The cost of Government Furnished Items (wash or common costs), and c) funds to cover increases in the scope of work. The MEO does not have to be depicted as a separate organizational entity, but it might be a good idea to identify the organization as an MEO since it will be subject to added requirements (e.g., post-MEO review, achievement of quality standards, etc.).
41. Since the MEO basically becomes a competing staff, what if a MEO employee is not performing up to par. How would we handle removing that person – through regular employee relations procedures? Other procedures?	Employee relation's procedures would be the same.
42. What type of training should be given to employees, MEO managers and staff, and top-level officials for what happen after the contract is awarded? E.g., (1) if the contractor wins – there are specific prohibitions of personal services contract/employer-employee relationship, how would an agency use Contracting Officer Technical Representatives and what are COTR responsibilities. (2) If the MEO wins – how that organization is to operate – what managers can and cannot do that they used to do before (e.g., take on more assignments, reprogram funds to/from the MEO, etc.)?	The question/issue contains its own answers as to training requirements.
43. After the MEO is formed, can those PDs be categorized as inherently governmental or commercial and if so, can that information be placed in an automated personnel/payroll system to identify commercial and inherently governmental positions and the employees associated with those positions?	Formation of an MEO does not confer IG position status since a MEO should only be comprised of commercial in nature positions. See the response to question 8.
44. What are an employee's rights should the contractor win? For example, what are their rights for any Federal employment, retirement, early retirement?	Right of First Refusal and Reduction in Force. Management should work with HR to ensure needed authorities are in place for retirement/early retirement.

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<b>AFTER</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
45. (1) What exactly is Right of First Refusal and when does it take effect? (2) OMB Circular A-76 states that “affected employees” are those who are released from their competitive levels in accordance with 5 CFR 351. What does this mean?	(1) Briefly, the right provided to civilian employees adversely affected by a cost comparison to receive consideration for contractor vacancies. (2) Briefly, affected employees mean employees whose positions will be abolished and who will receive RIF separation or change to a lower grade as a result of the contract award. <b>See Task 5-D</b>
46. What is HR’s role in ensuring Right of First Refusal?	HR can prepare a list of employees facing displacement and provide it to the private sector or ISSA awardee. This action is usually coordinated through the responsible contracting office.
47. If someone declines an offer with a contractor or does not receive an offer from a contractor, they don’t lose their RIF benefits, correct?	No. The Federal Acquisition Regulation provides for Right of First Refusal whereas RIF is provided for in Title 5.
48. What happens to Federal employees whose positions go to a contractor if they are not qualified or selected for any contractor jobs?	RIF rules would apply.
49. Will a contractor be required to provide the same salaries and benefits as the Federal Government? (Side note – we know that the answer is no to both, but we have heard this question on numerous occasions from our employees.)	No.
50. What procedures is the contractor required to follow when hiring and/or removing employees (e.g., does the contractor have to follow veterans preference/rule-of-3 hiring procedures; or RIF separation procedures)? (Side note – we know that the answer is no to both, but we have heard this question on numerous occasions from our employees.)	No, however contractors may receive credit for hiring certain qualified veterans.
51. There are several proposed laws regarding early retirement and buyouts? What is the status of Government-wide VERA and VSIP authority?	VERA and VSIP authorities are usually stated in appropriation language.

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<b>AFTER</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
<p>52. An instructor was heard saying that if a private sector consultant [firm] is awarded the contract, that the agency should only appeal to the MEO structure while the MEO appeals. That way if the MEO wins the appeal, the agency would already be in the MEO structure. We find that to be disruptive to employees and to agencies – couldn't the Transition Plan have the appeal time built in (meaning that an agency does not need to move to the new contract structure until after the appeals procedure is over – that they agency doesn't hire the new consultant if the consultant wins or doesn't set up the MEO until after the appeals process is finalized. This could apply to whether the MEO wins or the consultant wins).</p>	<p>This question requires further refinement to be able to be properly addressed.</p>
<p>53. The same instructor said that even if the MEO wins, it should immediately appeal. This was recommended because if the MEO wins and the private sector firm appeals and then subsequently wins the appeal, the agency would automatically have to go to the consultant [firm] with no recourse.</p>	<p>See the response to question 52.</p>
<p>54. Contractor wins/what happens during the appeal process? What happens if a contractor wins, a full RIF is conducted and Federal employees are separated, the MEO appeals, and subsequently wins? Is the agency obligated to rerun the RIF with the MEO winning and take the RIF'ed employees back? How is the paperwork handled if the contractor wins? Should the Transition Plan include provisions for not RIFing anyone until the appeals process is over? Does the contractor have to be hired as soon as the contract award is announced, while the appeal process is going on?</p>	<p>RIF should not occur until the final award is made. Mock RIF and RIF planning can occur prior to the initial award, however; RIF execution should occur during the transition period.</p>

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<b>BEFORE, DURING, AND AFTER</b>	
<b>QUESTION/ISSUE</b>	<b>IDEAS TO CONSIDER</b>
55. What are the ethics that need to be considered before, during, and after the study and for whom (e.g., employees/managers serving on the various CS teams)?	It would be a good idea to check with agency ethics counseling staff and request a briefing.
56. How do agencies improve the accuracy of their FAIR [Act] inventories?	Through establishment and application of consistent rules and procedures and training those responsible for FAIR Act inventory development.
57. How can the government improve the consistency of inventories between agencies?	By sharing their intellectual capital regarding their approaches.
58. Will OMB be providing more/better definitions of what the function codes are?	
59. How do agencies educate staff and managers in how to develop the inventory?	See the responses to questions 56 and 57.
60. Does anyone have any "best practices" on how to efficiently update and prepare their inventories?	See the responses to questions 56 and 57.