United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

National Policy Memorandum

Deputy Assistant Secretary – Management
Office of Facilities, Property and Safety Management

Number: NPM-SPC-2 A2 **Effective: 3/6/2020**
Expires: 3/6/2021

Title: Real Property Leasing Space Utilization and Space Request Policy – Amendment 2

1. Purpose

This memorandum extends NPM-SPC-2, Real Property Leasing Space Utilization and Space Request Policy – Amendment 1, issued February 28, 2019. The purpose of this memorandum is to document Indian Affairs' (IA) space utilization policy and to clarify the Request for Space (RFS) process in order to comply with Department of the Interior (DOI), General Services Administration (GSA), and Office of Management and Budget (OMB) policies and mandates. The guidelines in this document were developed to ensure that IA real property leases are administered and managed in a consistent manner and within current parameters for space utilization optimization.

2. Scope

This policy applies to all IA headquarters, field, and program staff under the authority of the Assistant Secretary – Indian Affairs (AS-IA), including the Bureau of Indian Affairs (BIA) and the Bureau of Indian Education (BIE).

3. Policy and Procedure

Current utilization (i.e., space usage) rates are 180 square feet per person inclusive of *all* square footage within the space footprint, which typically includes file rooms, break rooms, conference rooms, offices, workstations, air and maneuverability circulation space, and so forth.

If a program/office wants to request space, they must ask the IA Real Property Leasing (RPL) office for the RFS package materials (i.e., forms). The RFS forms, "Justification for Space" and the "Space Worksheet and Summary spreadsheets" are also located on the IA Online Forms webpage here: https://www.bia.gov/policy-forms/online-forms.

Regional RFS packages, including the Justification for Space worksheet and the Space Worksheet and Summary spreadsheets, should be prepared by the requesting office or program

and then submitted to the appropriate director such as the Regional Director (RD) or BIE Director, for review and signature. The Director will then forward the RFS package to the RPL office.

For Central Office (CO) space in the metro Washington, D.C./Maryland/Virginia area as well as the Main Interior Building, RFS packages should be sent directly to RPL. RFS packages should be signed and sent by the senior executive requesting the space.

RFS packages exceeding $250,000 net annual rent or $20 million in total contract value (including any option periods), and any unique or high profile leases, will be reviewed by the IA Facilities Investment Review Board (FIRB), comprised of IA senior leadership (see Attachment 2).

Prior to submission to the Office of Property and Safety Management (OFPSM) Director or FIRB for review, RPL will submit all RFS packages to the IA Office of Human Capital Management (OHCM) to be checked and certified for current and prospective staff counts. The IA Office of Budget and Performance Management (OBPM) must also review the RFS package for funding availability for the rental expenses, including rent and operating expenses and tenant improvements, for the duration of the lease until such time as those expenses can be included in the annual budget request, approved by DOI, and fully funded.

If the desired space layout changes will affect more than one program, the space changes at *all* affected locations must be approved by OFPSM *prior to notification to the affected programs*, and any changes must comply with the work areas defined in Attachment 1. The type of work area is defined by position/grade level and by supervisory duties within position descriptions. In instances of uncertainty, OHCM will validate supervisory responsibilities.

4. Roles and Responsibilities

A. FIRB is comprised of senior executives who serve as the governing body for making executive level decisions on the selection and management of capital investments for construction and leasing portfolio management in support of IA and DOI mission, goals, and objectives. FIRB reviews any request for space packages exceeding $250,000 net annual rent or $20 million in total contract value.

B. Deputy Assistant Secretary – Management (DAS-M) oversees OFPSM and provides general guidance on leasing and construction matters, as necessary, especially in matters with inter-office implications.

C. OFPSM provides oversight of the real property leasing program and ensures that real property leases (direct leases and GSA-provided spaces) are in compliance with all applicable laws, rules, policies, and procedures. The OFPSM Director also makes any final recommendations regarding space changes and approves RFS packages at $250,000 and below.

D. RPL falls under OFPSM and prepares lease and space policy and guidance consistent

with DOI, GSA, and 0MB. RPL also assists regions with lease actions, including RFS package preparation when needed, and coordinates all leasing actions (see also 4. F. Leasing Contracting Officer (LCO) below).

E. **RD** approves regional RFS packages and forwards to the RPL office for review and processing. The RD also oversees IA space within his/her region, but follows utilization and space assignment guidelines prepared by RPL in order to comply with current space policies and procedures.

F. **LCO** is warranted and appointed by the Bureau Procurement Chief. Only an LCO can enter into a lease, or make changes or modifications to an existing lease contract for the federal government.

G. **OHCM** provides certification of both current and prospective (vacant and funded) positions, and validates supervisory duties within position descriptions as needed.

H. **OBPM** provides certification of funding availability for rent expenses including base rent, operating expenses, and tenant improvements prior to any lease action.

5. Approval

3/6/20

Jason Freihage
Deputy Assistant Secretary – Management

Date

Attachment 1

Position/GS-Level	Type of Space	*Approximate Square Footage
Senior Executive (SES)	Private Office	Generally 220 to 240 SF
GS-15, Supervisory	Private Office	Typically 150 to 180 SF
GS-14, Supervisory	Private Office	Typically 120 to 150 SF
GS-15 and GS-14, Non-Supervisory	Shared Office or Workstation	About 100 to 110 SF each
GS-13 and GS-12	Workstation	Typically 81 to 100 SF (for example: 9' x 9' or 10' x 10')
GS-11 and GS-9	Workstation	About 72 to 80 SF (for example: 9' x 8' or 10' x 8')
GS-8 and below	Workstation	About 49 to 64 SF (for example: 7' x 7' or 8' x 8')
Contractors	Workstation	About 49 to 64 SF (for example: 7' x 7' or 8' x 8')
Touchdown Or Hotel Stations	Workstation	About 36 SF (for example: 6' x 6')
Conference Rooms	Private; Enclosed	About 10 SF x average number of users *Shared between programs on a calendar reservation basis.
Filing Rooms	Private, Enclosed	*See Attachment 3 regarding Transition to Electronic Records

In the event that space is current existing space, and where modifications to convert offices to open workstations based on the chart above would cause an undue financial or other mission-related burden to the program, existing excess available private offices should be shared and/or delegated to the next level position/grade level in a consistently-applied manner, giving supervisory positions by grade level priority and then based on grade level and seniority.

New private offices will not be built or constructed in existing spaces and should be assigned as outlined above.

***The office and workstation sizes noted above are <u>estimates</u> only and are subject to modification in order to accommodate utilization rates set by DOI, GSA, and OMB, and space limitations according to life safety and building codes. These are generally the maximum allowable sizes and do not guarantee a particular type or size space.**

Attachment 2

Office of the Assistant Secretary – Indian Affairs

Deputy Assistant Secretary – Indian Affairs (Management)

INDIAN AFFAIRS FACILITIES INVESTMENT REVIEW BOARD

(IA-FIRB)

CHARTER

Document Revised: December 2018

Attachment 2 (continued)

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1 Statement of Purpose

The Indian Affairs–Facilities Investment Review Board (IA-FIRB) is comprised of senior executives who serve as the governing body for making executive level decisions on the selection and management of capital investments for construction and leasing portfolio management in support of Indian Affairs (IA) and Department of the Interior (DOI) mission, goals, and objectives. The IA-FIRB has final approval of IA's Annual Construction capital planning investment portfolios before submission to DOI. The IA Annual Construction Portfolio consists of the following budget lines: education construction, public safety and justice (PS&J) construction, resource management construction, and other program construction.

The Office of Facilities, Property, and Safety Management (OFPSM) and Division of Water and Power (DWP) provide recommendations on construction capital investments requesting funding through the annual budget process, working capital funds, and makes capital investment recommendations for consideration and approval for projects over $2 million. Real Property Leases over $250,000 net annual rent or $20 million in total contract value (including any option periods), and high-profile or unique leases (e.g., consolidations, redesign to improve utilization, re-locations) are reviewed and approved by the FIRB. The Real Property Leasing (RPL) Program under OFPSM also provides recommendations on real property lease investments.

Note that this revision changes the name from the IA--Construction Investment Review Board (IA-CIRB) to the IA--Facilities Investment Review Board (IA-FIRB), since review of real property leases were added to the scope.

2 Scope

The IA-FIRB develops and maintains a capital asset investment portfolio that is business process driven, managed within budgeted costs and within an established schedule, and contributes to tangible and observable improvement in IA mission performance. The IA-FIRB does not handle capital IT investments.

2.1 Program Objectives

- Oversee the Indian Affairs CPIC process
- Develop and maintain multi-year capital investment plans for construction
- Review the ongoing projects to ensure that their status, progress, and outlook are satisfactory and consistent with project plans
- Identify, minimize, and mitigate risks of Indian Affairs' investments throughout their life cycle
- Maximize return on investment throughout investment's life cycle
- Submit completed business and multi-year plans to DOI in support of the Executive CPIC
- Ensure decisions comply with the budget cycle requirements including requests for additional funding or use of the working capital fund
- Assure progress of capital investment projects meet established budget and schedule baseline expectations or provide a review process for any identified deviations from the baseline
- Identify deficiencies in project management and monitor corrective actions.

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- Assure requests for real property leases are economical and provide the best value option to meet the mission requirements, while evaluating the opportunity to co-locate and/or consolidate, improve utilization rates and address the Reduce the Footprint initiative.

2.2 Program Deliverables

- Program Charter
- 5-Year Plans for Construction Portfolios
- 5-Year Construction In Progress and Deferred Maintenance Plans
- eCPIC (electronic Capital Planning and Investment Control) Quarterly Reports
- 5-year Space Management Plan (5-YR SMP) for GSA-provided and direct leased space
- Executive training on the CPIC program and tools (as needed)

2.3 Program Timeline

Meetings will occur quarterly.

3 IA-FIRB Membership

3.1 IA-FIRB Members

Program Sponsor:	Deputy Assistant Secretary–Indian Affairs (Management)
Voting Members: (Mandatory)	Principal Deputy Assistant Secretary–Indian Affairs Deputy Assistant Secretary–Indian Affairs (Management) Deputy Assistant Secretary, Policy and Economic Development Director, Bureau of Indian Affairs Director, Bureau of Indian Education
Executive Secretary:	Director, Office of Facilities, Property, and Safety Management
Non-Voting Members: (Optional)	Chief Financial Officer Bureau Procurement Chief Director, Office of Human Capital Management Associate Chief Information Officer, Office of Information Management Technology Director, Office of Budget and Performance Management Director, Office of Indian Energy & Economic Development Director, Office of Self Governance Deputy Bureau Director, Field Operations (BIA) Deputy Bureau Director, Trust Services (BIA) Deputy Bureau Director, Indian Services (BIA) Deputy Bureau Director, Justice Services (BIA) Deputy Director, School Operations (BIE)
Subject Matter Experts: (Non-Voting, Optional)	Chief, Division of Facilities Management and Construction Chief, Division of Water and Power Chief, Real Property Leasing

3.2 Roles and Responsibilities

Program Sponsor:	Charters Program, assigns Program Manager, delegates authority over project scope, facilitates IA-FIRB discussion on key milestone decisions including go/no go (variances or baseline changes), implementation or termination.
Voting Members:	Responsible for portfolio management of investments to supports strategic plans and mission goals.
Non-Voting Members:	Provide information on investments when questions arise at IA-FIRB Meetings (attendance required at Voting Members' discretion).

3.3 Meeting Rules

- Meeting will not occur without a quorum (3 of 5) Voting Members or their representative(s)
- Representatives must have been empowered to vote for Voting Member (Voting Members should make every effort to attend. Delegation can be assigned down one level to their deputy.)
- Voting by simple majority
- Meeting minutes will be taken and distributed

4 Assumptions and Constraints

The following section identifies assumptions (things that are understood to be true) and constraints (things that, if they occur, will limit the team's options) known prior to the start of the IA-FIRB that could affect its successful operation.

4.1 Assumptions

- Voting Members or representative (proxy to vote) will attend all meetings.
- Voting Members or representatives will follow-up on action items.
- The capital planning and investment control process will be used including timely submission of OMB Exhibit 300s, Construction 5 Year Plans, and eCPIC Quarterly Reports.
- Construction Capital Planning and Investment Control (CPIC) process will evolve over time.
- The Department of the Interior and Bureau CPIC Guides will be used for procedures.
- The board will adhere to OMB guidance (A-11 and A-130 Revised), related Department of the Interior CPIC policies, procedures, and guidance.
- The Deputy Assistant Secretary - Indian Affairs (Management) will work to ensure that necessary resources are available to support the IA-FIRB in carrying out its responsibilities.

Attachment 2 (continued)

4.2 Constraints

- Legislative mandates and DOI guidance changes occur at critical points in the budget cycle and may cause delays or changes to procedures and reporting requirements.
- Budget reductions will increase workload and could cause schedule delays.

Limited staff support may be insufficient to carry out all assigned work.

5. Approval

Program Sponsor and Voting Member:

Deputy Assistant Secretary – Indian Affairs (Management)	1/31/2019 **Date**

Voting Members:

Principal Deputy Assistant Secretary – Indian Affairs	2/4/19 **Date**
Deputy Assistant Secretary – Indian Affairs (Policy and Economic Development)	2/4/19 **Date**
Acting **Director, Bureau of Indian Affairs**	2-1-19 **Date**
Director, Bureau of Indian Education	1-29-19 **Date**

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Attachment 3

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

June 28, 2019

M-19-21

MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM: Russell T. Vought
Acting Director
Office of Management and Budget

David S. Ferriero
Archivist of the United States
National Archives and Records Administration

SUBJECT: Transition to Electronic Records

This Administration is driving transformational change to modernize Government, including moving to electronic government, through multiple complementary channels. In March 2018, the President's Management Agenda (PMA) established an overarching vision to improve mission delivery, customer service, and accountable stewardship on behalf of the American public. The PMA established 14 Cross-Agency Priority (CAP) Goals and recognized that powerful transformation would occur at the intersection of multiple goals, citing the move to an electronic—or "paperless"—government as a primary example that touches multiple goals.

In addition, in June 2018, the Administration's *Delivering Government Solutions in the 21st Century: Reform Plan and Reorganization Recommendations* included a proposal to transition Federal agencies' business processes and recordkeeping to a fully electronic environment, and end the National Archives and Records Administration's (NARA) acceptance of paper records by December 31, 2022. This memorandum specifically describes the steps the Government will take to meet the NARA goal.

The Federal Government spends hundreds of millions of taxpayer dollars and thousands of hours annually to create, use, and store Federal records in analog (paper and other non-electronic) formats. Maintaining large volumes of analog records requires dedicated resources, management attention, and security investments that should be applied to more effectively managing electronic records. The processes that create analog records increase burden on citizens by requiring them to conduct business with the Government in person or by mail, rather than online, and trap valuable Federal data in paper records where it can only be extracted manually and at great expense.

Agencies are encouraged to consider cost-effective opportunities to transition related business processes to an electronic environment in support of the PMA and Reform Plan. This memorandum specifically focuses on records management, and directs Federal agencies to transition recordkeeping to a fully electronic environment that complies with all records management laws and regulations.

This memorandum directs all Federal agencies to:

1. Ensure that all Federal records are created, retained, and managed in electronic formats, with appropriate metadata; and

2. Consistent with records management laws and regulations, develop plans to close agency-operated storage facilities for paper and other, analog records, and transfer those records to Federal Records Centers operated by NARA or commercial storage facilities.

Additionally, this memorandum consolidates requirements from prior OMB records management guidance to ensure consistent, government-wide policy and practices. This consolidation also addresses the burden reduction requirements in OMB Memorandum M-17-26, *Reducing Burden for Federal Agencies by Rescinding and Modifying OMB Memorandum*. Accordingly, OMB rescinds the following memoranda:

- OMB Memorandum M-12-18, *Managing Government Records Directive*; and
- OMB Memorandum M-14-16, *Guidance on Managing Email*.

Section I of this memorandum establishes deadlines for all agencies to adopt electronic recordkeeping requirements, in a manner that complies with the Federal Records Act (44 U.S.C. Chapters 29-33). Section II establishes requirements for NARA and the Office of Personnel Management (OPM) that support the government-wide goals in Section I.

Section I: Implementation Guidance for all Agencies

All Federal agencies (CFO Act and non-CFO Act) must meet the following targets in order to begin the transition to a fully electronic government.

1.1 By 2019, Federal agencies will manage all permanent electronic records in an electronic format.

By December 31, 2019, all permanent electronic records in Federal agencies will be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format. Federal agencies have been required to manage all (permanent and temporary) email records in an electronic format since 2016 and are expected to continue to do so.

1.2 By 2022, Federal agencies will manage all permanent records in an electronic format and with appropriate metadata.

By December 31, 2022, all permanent records in Federal agencies will be managed electronically to the fullest extent possible for eventual transfer and accessioning by NARA in an electronic format. This does not apply to permanent records accessioned into NARA or transferred for storage into Federal Records Centers before December 31, 2022. After December 31, 2022, all agencies will transfer permanent records to NARA in electronic formats and with appropriate metadata, in accordance with NARA regulations and transfer guidance, except where an agency has been granted an exception under procedures to be developed by NARA under paragraph 2.2, below.

1.3 By 2022, Federal agencies will manage all temporary records in an electronic format or store them in commercial records storage facilities.

By December 31, 2022, all temporary records in Federal agencies will be managed electronically to the fullest extent possible. Agencies that receive an exception under paragraph 2.2 may continue to produce and store records in analog formats, but inactive records eligible for transfer after December 31, 2022 must be stored in commercial storage facilities. This does not apply to temporary records that are transferred for temporary storage into Federal Records Centers before December 31, 2022.

By December 31, 2022, all agencies must close agency-operated records storage facilities and transfer inactive, temporary records to Federal Records Centers or commercial records storage facilities. Temporary, analog records that become eligible for transfer after December 31, 2022 must be transferred to commercial storage facilities that meet NARA records storage requirements.

1.4 Federal agencies will maintain robust records management programs that comply with the Federal Records Act and its regulations.

Agencies must continue the following practices to ensure agency records are appropriately retained, stored, and transferred according to their disposition schedules.

- Designate a Senior Agency Official for Records Management who is at the Assistant Secretary level or equivalent and has direct responsibility for ensuring that the agency efficiently and appropriately complies with all applicable records management statutes, regulations, and policy, including the requirements of this memorandum.
- Designate an Agency Records Officer who is responsible for overseeing agency recordkeeping requirements and operations, and holds the NARA Certificate of Federal Records Management Training.
- Annually inform all agency personnel of their records management responsibilities in law, regulation, and policy, and provide training specific to the practices and policies of the organization.
- Ensure all records created or maintained by the agency are covered by a NARA-approved records schedule and permanent records are transferred to the National Archives when they reach their scheduled disposition date.
- Ensure NARA-approved records schedules are updated as business practices transition to electronic workflows.

Section II: Implementation Guidance for NARA and OPM

NARA and OPM will take steps to assist all agencies in transitioning to fully electronic records management.

2.1 By 2020, NARA will revise records management regulations and guidance to support Federal agencies' transition to fully electronic recordkeeping.

By September 30, 2020, NARA will issue updated regulations and guidance to provide clear standards for fully electronic recordkeeping, including electronic records storage, formats, and metadata, as well as transfer guidance. NARA will provide modernized processes to efficiently schedule, transfer, and accession permanent, electronic records through fully electronic processes.

NARA will issue updated regulations and clear policies that permit agencies to digitize records created in analog formats and, where appropriate, dispose of analog originals.

In addition, NARA will establish a process to issue exceptions to the provisions of this memorandum where replacing analog records with electronic systems would be burdensome to the public, the cost would exceed the benefit, or otherwise should not be replaced for some other reason, including statutory, regulatory, or policy barriers.

2.3 By 2020, OPM will revise position classification standards for archival and records management occupational series to incorporate electronic records management responsibilities and functions.

By December 31, 2020, OPM will issue updated position classification standards for the archivist, archives technician, and records and information management job series to include electronic records tasks, assignments, and responsibilities.

2.4 By 2022, NARA will no longer accept transfers of permanent or temporary records in analog formats and will accept records only in electronic format and with appropriate metadata.

After December 31, 2022, NARA will no longer accept new transfers of permanent or temporary analog records to the fullest extent possible. NARA will continue to store and service all analog records transferred to a Federal Records Center by that date until their scheduled disposition date. Once those records reach their disposition date, NARA will accept the permanent records into the National Archives in their original (analog) format and will appropriately dispose of the temporary records.

Beginning January 1, 2023, all other legal transfers of permanent records must be in electronic format, to the fullest extent possible, regardless of whether the records were originally created in electronic formats. After that date, agencies will be required to digitize permanent records in analog formats before transfer to NARA. Digitization and transfer must be made in accordance with NARA regulations and transfer guidance, including metadata requirements.