Attached are comments from one of the Navy's field activities who has been undergoing efficiency efforts for several years.

- DRAFT OMB CIRCULAR COMMENTS.doc

**DRAFT OMB CIRCULAR COMMENTS**

♦ After going through prior CA studies, Zero Base Analysis, 11 Business Case Analysis (BCA’s) and currently conducting a study, our activity is lean. All support areas have been studied. We are now operating with limited resources in which 12 months would be unrealistic within the DOD arena. We do not have the resources for developing the PWS and Management Plan without 3SO contractor support.

♦ Answering from the Field Activity, the CA expertise is currently limited to the CA Inventory Coordinator. We do not have the resources for creating the newly established positions identified in the draft. The CA Inventory coordinator performed the functions. Our HR is limited as it’s been regionalized. We didn’t have a steady HR person involved with our current study. Since these positions are full time, who is going to fund for the additional FTE’S? Activity funding is limited.

♦ Employee performance contracts will be useless without the proper support from management.

♦ Security Guards were studied and bought back in-house (erroneously outsourced) at a significant cost savings (BPR initiative).

♦ BCA’s- Effective BCA’s take anywhere from 6-12 months to complete. Fifteen days does not appear to be realistic. By the time positions are announced, there hasn’t been time to plan for streamline study.

♦ From the activity perspective, it appears that only supervisor’s will be IG. Therefore, the majority of the existing workforce will be subjected to competition. Impact on R&D and Depot’s. Some activities have downsized to the point where they could be consolidated or closed (1,000).

♦ 3d – No responses to Solicitation. Doesn’t appear cost effective to add additional
steps when there is either no response, or non-responsive/not responsible. Just enact the agency MEO.

Just appears to a significant increase in cost to conduct studies.