



United States Department of the Interior

OFFICE OF THE SECRETARY

Washington, D.C. 20240

National Policy Memorandum

Assistant Secretary – Indian Affairs
Deputy Assistant Secretary – Indian Affairs (Management)
Office of Facilities, Property and Safety Management

Number: NPM-SPC-02 A1

Effective: 2/28/19

Expires: 2/28/20

Title: Real Property Leasing Space Utilization and Space Request Policy – Amendment 1

1. Purpose

This memorandum extends NPM-SPC-02, Real Property Leasing Space Utilization and Space Request Policy, issued June 6, 2017. 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 Regional Director (RD) for review and signature. The RD will then forward the RFS package to the RPL office, which will review it and forward it to the Director of the Office of Facilities, Property, and Safety Management (OFPSM) for review and approval (or disapproval). Notification of approval or disapproval will be communicated to the RD. If disapproved, an explanation will accompany the notice.

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 for review and forwarding to the OFPSM Director for review and approval (or disapproval). RFS packages should be signed and sent by the senior executive requesting the space. Notification of approval or disapproval will be communicated to the requesting program office. If disapproved, an explanation will accompany the notice.

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 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.

Travel needed for site inspections, market surveys, lease negotiations, and lease execution must be requested by the respective program or RD and include a line of accounting for funding of the travel expenses. OBPM will validate funding availability *prior* to the RPL office scheduling the requested travel in Concur.

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. **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 OMB. RPL also assists regions with lease actions, including RFS package preparation when needed, and coordinates all leasing actions (see also 4. F. 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. **Lease Contracting Officer (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




 Jason Frehage Date
 Acting Deputy Assistant Secretary – Indian Affairs (Management)

Attachment 1

Position/GS-Level	Type of Space	*Approximate Square Footage
Senior Executive (SES)	Private Office	About 220 to 240 SF
GS-15, Supervisory	Private Office	About 180 SF
GS-14, Supervisory	Private Office	About 150 SF
GS-15 and GS-14, Non-Supervisory	Shared Office or Workstation	About 120 SF each
GS-13 and GS-12	Workstation	About 100 SF
GS-11 and GS-9	Workstation	About 80 SF
GS-8 and below	Workstation	About 64 SF
Contractors	Workstation	About 64 SF
Hoteling Stations	Workstation	About 48 SF
Conference Rooms	Private; Enclosed	About 10 SF x average number of users

In the event that space is current existing space, and where modifications would cause an undue financial or other mission-related burden to the program, private offices should be shared and/or delegated to the next level position/grade level in a consistently-applied manner.

*The office and workstation sizes noted above are estimates 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.

For further information and guidance, or to obtain RFS package documents, please see the contacts below.

Point of Contact	Role	Contact Information
Kim Covington	Lease Contracting Officer/GSA Space Point of Contact	Kim.Covington@bia.gov (202) 208-6188 office (202) 603-0867 work cell
Morgan Rodman	Office of Facilities, Property, and Safety Management/Real Property Leasing	anthony.rodman@bia.gov 202-573-2740

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)

Table of Contents

1	Statement of Purpose	1
2	Scope	1
2.1	Program Objectives	1
2.2	Program Deliverables	2
2.3	Program Timeline	2
3	IA-CIRB Membership	2
3.1	IA-CIRB Members	2
3.2	Roles and Responsibilities	3
3.3	Meeting Rules	3
4	Assumptions and Constraints	3
4.1	Assumptions	3
4.2	Constraints	4
5	Approval	4

Attachment 2 (continued)

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.

Attachment 2 (continued)

- 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

Attachment 2 (continued)

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)

1/21/19

Date

Voting Members:



Principal Deputy Assistant Secretary – Indian Affairs

2/4/19

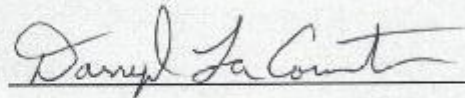
Date



Deputy Assistant Secretary – Indian Affairs
(Policy and Economic Development)

2/4/19

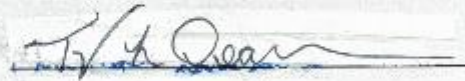
Date



Acting Director, Bureau of Indian Affairs

2-1-19

Date



Director, Bureau of Indian Education

1-29-19

Date