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To: David C. Childs A-76comments/OMB/EOP@EOP
cc:
Subject: Comment on Provision in OMB Cir A-76

Our firm has been doing A-76 studies since the early 1980's. Supported agencies have included DOD (all branches of the services), Department of Transportation (various agencies), Department of State, Department of Commerce, Department of Treasury, and others. Support has been for many dozens of A-76 studies, ranging in size from a single-site, single-function study of 10 FTE to a multi-site, multi-function study of 1,000+ FTE. I cite this extensive experience of working in the trenches with many A-76 clients only as a backdrop to the conclusion that we have reached regarding the duration that will be allowed for any future A-76 study under the revised provisions of OMB Circular A-76. While we have always believed that an allowed (statutory) window of 36-months to 48-months to complete a study was unnecessarily long, our experience also clearly tells us that a "one-size-fits-all" duration of 12 months is unrealistic. Many agencies will fail in their attempts to meet that timeline objective. There are a number of pressures and confluence of forces that make a 12-month limit unrealistic. Although these include factors that range from the diversity of offices that get involved (e.g., Contracting, HRO, A-76 program office, functional departments/activities under study, unions, etc) to the knowledge and commitment levels of individual CA study team members, suffice it to say here that experience shows that the timeline imposed on the federal agencies would be more realistically achievable if it was set at 18 months, with an allowance for 24 months if the study is multi-function, multi-site. Moreover, it is recommended that the new duration limit be revised accordingly.

Sincerely,
E. L. HAMM & ASSOCIATES, INC.

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