

David Hard <dhard@helicon.net>
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To: David C. Childs A-76comments/OMB/EOP@EOP
cc:
Subject: revised A-76 comments

David L. Hard
107 Wright St.
Point Marion, PA 15475
Telephone: 724-725-1535 email:dhard@helicon.net

Dear Sirs:

I wish to comment upon the proposal published in the Federal Register, Vol. 67, No. 223, p. 69769-69774, regarding the revision of Budget Circular No. A-76, "Performance of Commercial Activities."

I see no rationale for making the change to consider all federal jobs to be commercial and subject to contracting out. Currently all federal jobs are presumed to be inherently governmental unless they can be justified as commercial and this appears to be the most logical rationale to use. The proposed revision significantly narrows the definition of what activities are inherently governmental, thereby increasing the pool of work subject to contracting out. It appears you will be forcing government managers to spend valuable time to go through the paperwork process to justify each and every position. This seems to be a monumental waste of time and taxpayer money and would offset any potential savings which might be seen by contracting some government jobs to the private sector.

Additionally, the revision requires Agencies to inventory work that is inherently governmental each year, although the law only requires inventory of those jobs that are considered commercial. Again, this seems redundant, repetitive, and wasteful of our taxpayer resources.

The revision would require federal employees to sign a performance contract when they win against a contractor bid and their work would then be re-competed every three to five years. This seems to be a disruptive process which can only serve to decrease government employee morale and, potentially, their effectiveness.

I can see no reason why work which is subject to competition/study for more than 12 months could be directly transferred to a contractor. Under the current A-76 process there is no such provision. The revision seems to be a punitive measure toward those agencies and their employees who do not meet the arbitrary 12 month guideline.

The selection of the contract on the basis of the so-called “best-value” should be used only for government employees, to allow them to have the benefit of bringing their experience, knowledge, and wisdom of serving the country in their jobs to the table. The government workers of this country have done, and currently are doing, a great job. To pull their job security out from under them is a slap in the face to all of these dedicated workers.

The response of government workers to the terrorist acts of 9/11 and the anthrax exposures of our citizens and government postal workers was outstanding. I am concerned that if we privatize too many of our government jobs with the lowest bidder, that we will lose the commitment, dedication, and exemplary service which we have received in the past and have come to expect from our government workers.

Truly,

David L. Hard, Ph.D.

A-76comments@omb.eop.gov