

## **State Agency Evaluation of Selected FPAC Business Center Functions February 4, 2021**

### General Observations

1. The FPAC Business Center (BC) should serve strictly in support roles for the agencies it serves. It should not control or dictate the utilization of agency resources.
2. The creation of the BC has moved logistics away from NRCS' conservation partners. It is difficult to deal with an entity that works in obscurity from these partners. Mission support personnel in NRCS, prior to the creation of the BC, still had a connection to the conservation partners. FPAC BC personnel do not.
3. The NRCS Chief is an extremely important position to the conservation partnership. Any move to remove decision-making authority from the Chief's office to any kind of centralized process (like the BC) dilutes the efficiency and effectiveness of the conservation partnership.
4. Personnel working in the FPAC BC do not share, or necessarily understand, the missions of the agencies they are tasked to serve. Conservation lies at the heart of every NRCS staffer's job; not so with FPAC BC personnel.
5. While centralizing certain functions may be effective, attempting to address the administrative needs of the three FPAC agencies with a one size fits all approach presents a number of red flags. In many cases, taking this approach by centralizing functions within NRCS can be problematic. Standardizing administrative functions across 50 states may make tracking easier, but it does not necessarily make the system more effective.

### Budget

The FPAC BC has assumed the role of developing, installing, and monitoring budget formulation, allocation, and execution. NASCA believes this is an overreach, particularly for an entity that is supposedly designed as a support entity. **NRCS budget formulation and management should be a function of the Chief's office.** At best, there may be a role for the BC in monitoring budget performance.

### Financial Management

The FPAC BC administers FPAC's core financial management functions, including billing, payment, and collections. There is likely a valid argument for centralizing these functions. However, execution in this arena has been dismal. State conservation agencies conservation districts, and local watershed sponsors are reporting millions of

dollars in aged receivables. Many of these payments are delayed up to five months. This is simply unacceptable. **NASCA recommends an FPAC BC performance requirement of fully processing payments within 30 days of receiving invoices and/or claims.**

Partner experience with NRCS payments was dramatically enhanced when agency financial management personnel work in the state from which the claim originated. Snags and uncertainties with claims were handled much more effectively at the state level. See general comment #2 above.

### Grants and Agreements

Approximately 90% of the agreements this unit handles are NRCS agreements. Centralizing this function has been disastrous. We hear countless stories about executing new or renewed agreements with state agencies and agreements that take 6-12 months or more to process. **Processing these agreements is a function that should be returned to the agency. In fact, the authority for this function should be returned to the State Conservationist in each state.**

Should this function remain centralized, it is imperative to clearly identify the specific responsibilities of NRCS Program staff versus FPAC Grants and Agreements staff. Too often agreements are stalled due to programmatic questions raised by Grants and Agreements staff, when these questions have already been addressed by NRCS Program staff.

### Human Resources

Recruitment of qualified candidates that are enthusiastic about working for NRCS is vital to the agency's long-term success. NASCA understands that centralizing human resource functions may provide some efficiencies. However, there are some functions that should be returned not just to NRCS but to the state office level. For instance, **State Conservationists should have the authority to directly recruit, assemble and select from rosters of applicants for further consideration, advertise positions, and hire employees. Additionally, NRCS needs direct hiring authority for all of its positions.**

### Information Solutions

NASCA understands the advantages of consolidating IT functions for FPAC. Certainly there are economies of scale to be realized. However, several issues related to General Comments #1 and #2 above are of particular concern. For instance, we have reports of conservation district employees co-located with NRCS personnel in FPAC-controlled offices that cannot get internet access in the building. This demonstrates the loss of

service to core NRCS partners which results when functions are consolidated in the FPAC BC.

Another very common issue is the length of time required for partner staff members to be issued a LincPass from FPAC. Regardless of where this function resides, **a LincPass should be issued within 30 days of submitted application barring any unusual concerns, and the IT needs of the conservation partners must be of equal priority to those of NRCS staff.**

#### Management Services

From NASCA's perspective, the FPAC BC's handling of NRCS office space leases has been dismal. The BC has been exceptionally detrimental to co-location between NRCS and conservation districts at the field office level. There is no value placed on this co-location, which is a mistake that will cost the partnership in terms of service to our cooperators for years to come. **There must be a formal recognition of the value of co-location between NRCS and conservation districts at field offices built into the lease management protocols.**

#### Training

Prior to the launch of the FPAC BC, NRCS conducted its own training under the purview of the National Employee Development Board. The conservation partners held a seat on this board, which in large part dictated training regimens for NRCS staff and partner technical staff. The BC did away with this Board, and thus any partner input into the agency's training planning. Conversations with training personnel in the FPAC BC have revealed that the training needs of FSA, RMA, and NRCS are dramatically different. The other agencies employ "off the shelf" training programs, while NRCS requires specialized training programs for their staff and partners.

NRCS has made an attempt to re-create its own National Employee Development Board, but this presents a duplication of effort for training planning in the FPAC Mission Area. There is a simple fix for these issues. **Return the responsibility for planning and implementing training programs back to the individual FPAC agencies.** Attempting to combine these functions on behalf of the agencies in the BC has been at best counterproductive and at worst an utter failure.