



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Washington, D.C. 20240
<http://www.blm.gov>



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Ms. Anne-Marie Fennell
Director, Natural Resources and Environment
U.S. Government Accountability Office
441 G Street, NW
Washington, DC 20548

Dear Ms. Fennell:

Thank you for providing the U.S. Department of the Interior (Department) the opportunity to review and comment on the draft Government Accountability Office (GAO) report entitled, *Bureau of Land Management: Agency's Reorganization Efforts Did Not Substantially Address Selected Key Practices for Effective Reforms* (GAO-20-397R).

We are pleased that the report recognizes the work of the Bureau of Land Management (BLM) as it finalized the relocation of the BLM headquarters and continues to complete the movement of associated positions to the West. This includes BLM's work to establish goals and outcomes for the initiative, the use of data and evidence to inform its decision, the various steps taken to manage and monitor the process of the relocation, and the measures adopted to ensure strategic workforce management.

We disagree with your assessment of BLM's involvement of employees and stakeholders and believe it should reflect the early and genuine involvement of multiple rungs of BLM management over several months, all of which comprised a key part of the BLM's analysis. From Assistant Directors to Division Chiefs, Branch Chiefs, and necessary support staff, the level of involvement and awareness of the process was not insignificant. As noted in the draft report, the BLM executive leadership team's Assistant Directors coordinated with Division Chiefs as the relocation plans were formulated. The Division Chiefs, and to varying degrees Branch Chiefs, provided meaningful input into the type of functions that each position fulfilled, whether they were primarily headquarters or field functions, and whether they were intrinsically tied to the Washington, D.C. geographic area. The BLM executive leadership team then engaged in a back and forth dialogue as the determinations were made regarding each position's functions, whether each position was primarily headquarters or field, and what would be the best geographic location for the position in the West. At the same time, BLM State Directors were also involved.

The draft report criticizes how BLM management undertook this process because documents reviewed "did not indicate what input the executive leadership team provided, whether it was considered, or how it was used in formulating reorganization plans." Due to the timeframe driving your report, we tried to meet your compressed schedules and supply relevant

information. This includes the July 16 letter to Congress that, among other things describes the rationales for moving positions to BLM locations in the West, rather than multiple versions of draft internal documents.

Similarly, the draft report notes that the documents reviewed did not indicate that the BLM relocation was a topic of discussion during listening sessions regarding the department-wide reforms. Yet, multiple meetings were held with employees of the Department and stakeholders at which time the possibility of the move West was publicly known and the key goal of moving employees closer to the lands they manage was well understood.

Finally, the draft report uses “reorganization, relocation, and reform” interchangeably. These terms are not interchangeable. The policy decision to move the BLM headquarters and positions West is a relocation of positions not a reorganization. It is not an effort to reform the BLM or to change the BLM’s important multiple-use mission managing 245 million acres of our nation’s public lands—99.97% of which are located in the American West. Rather, it is a commonsense relocation of top decisionmakers and senior personnel closer to the lands they manage in the West. This move will serve the bureau, its employees, and the American public better. Applying key questions developed for actions different from those being undertaken by the BLM, as you did, results in an imprecise comparison by the GAO.

Moreover, relocating BLM headquarters and positions to the West does not involve any reduction in force activities. As a relocation rather than a reorganization, the BLM is moving existing positions to several new areas in the West. This effort does not include workforce restructuring or eliminating encumbered positions. Instead, the BLM is filling positions that have remain unfilled, in some cases, for years. Meanwhile, the Bureau has worked assiduously to minimize the impact to affected employees by offering relocation bonuses and Permanent Change of Station benefits and has mobilized human resources officers from across the nation to come to Washington, D.C., to work one-on-one with employees to manage the relocation process. In the handful of cases where employees declined to move West with the relocation, the agency is working to find new positions for them within the Department of the Interior or other federal employment opportunities in the Washington metro area.

The GAO issued four recommendations to the Department as part of its overall findings. Below is a summary of actions taken or planned to implement the recommendations.

Recommendation 1: The Director of Bureau of Land Management should establish outcome-oriented performance measures to assess the effectiveness of the reorganization.

Response: The BLM has developed outcome-oriented performance measures, but will take this under consideration and follow through as appropriate.

Recommendation 2: The Director of Bureau of Land Management should develop an implementation plan for the reorganization that includes milestones and deliverables to track and communicate implementation progress.

Response: The BLM has set forth the steps and key milestones and will continue to report on its progress in meeting key milestones and implementation progress.

Recommendation 3: The Director of Bureau of Land Management should complete a strategic workforce plan that addresses how it will recruit for and fill vacant positions resulting from the relocations.

Response: BLM has a comprehensive recruitment process underway.

Recommendation 4: The Secretary of the Interior should ensure its bureau leadership incorporates key practices for effective agency reforms prior to implementing reorganization activities at other Interior bureaus.

Response: The Department will take this recommendation under consideration.

If you have any questions, or need additional information, please contact Ms. Nancy Thomas at (202) 208-7954.

Sincerely,



William Perry Pendley,
Deputy Director, Policy and Programs