

**Consolidated comments - 2013 Annual Update to the Core Competencies and Recommended Curriculum
for Federal Buildings Personnel (FBPTA)**

Agency	#	Comment	Response
USDA	1	The 2013 proposed enhancements to the Core Competencies and Recommended Curriculum for Federal Buildings Personnel dated 6/28/2013 do not simplify the Core Competency model, or make FBPTA any more-straightforward for ARS to implement. The addition of the “Functional Role”, “High Priority/High Value”, “Early Career”, and cross-functional designations further complicate the model, and make it more confusing/difficult to pilot and “roll out” to remote ARS Locations.	<u>Agree.</u> The Update does not simplify the model, it is intended to do 2 things: 1) Serve as an example of the thought-process that each agency needs to follow to apply the FBPTA Competency Model to its own Facility Management (FM) organization; and, 2) help differentiate where and how thoroughly the qualifications in the Recommended Curriculum align with the roles played by individuals in a facility management organization. <u>GSA's FMI program can help agencies approach implementation of the FBPTA following the logic provided in the Update as a starting point.</u>
USDA	2	ARS’ organizational structure is such that we do not typically have individuals designated as “Facility Managers” or “Facility Operators” at our research Locations. Because of other energy management/energy conservation regulations, ARS does have one individual, located at the Beltsville, MD headquarters, designated as the ARS (sub-Agency-wide) Energy Manager. He is assisted by several Area (regional) Energy Managers, who have other primary responsibilities (typically as Engineering Project Managers.)	<u>Agree.</u> Each individual agency takes a unique approach to Facility Management (FM). For this reason, position titles, occupational series and grades are not standard across agencies or even across parts of the same agency. <u>The roles are merely intended to provide a starting point in designing which competencies will be applied to what positions within each agency's unique FM organization.</u>

USDA **3** ARS' Facility Operations & Maintenance personnel tend to have been trained in trade-school (HVAC, plumbing, electrical, etc) or trained-in-the-field, rather than to have completed the "classroom-based, foundational training." One of ARS' major challenges in implementing FBPTA is that, in many cases, the Facilities Managers and Facility Operators are supervised by Administrative Officers (typically with a business or general management background) or a Research Leader (RL)/Scientist (gifted scientists, but lacking expertise in Facilities Management.) The complexity of the current Core Competency model will make it very challenging for the non-technical supervisors to review their Facilities Management and Facilities Operation personnel and to correctly assess their training and qualifications. Hopefully a robust "Community of Practice" can be developed, to provide guidance for non-technical supervisors, who supervise Facilities Management personnel.

USDA **4** Concur with the changes to the "Design" Competency area. Agree that registered engineers and registered architects already go through their own, rigorous, education and credentialing process. No need for FBPTA to "reinvent that wheel."

Agree. We need for a method of applying the model to situations where the Facility Management (FM) organization is managed or staffed by personnel who do not have a formal or professional background in FM. A community of practice, the Recommended Curriculum, and other resources under development at FMI will be available to help. Additionally, FMI can serve as a clearinghouse where agencies can share ideas for training resources; we welcome any suggestions on ideas or resources that have worked for ARS.

Agree.

- USDA** **5** If there are additional recommended courses (ideally, FREE, on-line, on-demand format) that will be added for 2013, to supplement the June 2012 Recommended Curriculum, when/where will the titles of 2013 recommend courses be provided? When will the twelve (12) courses – original June 2012 recommended curriculum – be mapped to the Competency Model?
- GSA has established a process and hired a contractor to provide impartial review and mapping of courses to the FBPTA Competency Model. FEMP has been asked to submit their course materials for review and has allotted resources in FY14 to do so. The Recommended Curriculum and other FEMP classes will be reviewed as soon as that submission occurs. Should resources be a problem we will assist FEMP with the submissions as soon as the qualifications requested by GSA's PBS organization are completed in early November.
- USDA** **6** Many ARS research facilities are located in rural areas, far from major metropolitan areas. Agree that professional associations provide valuable training, however most ARS employees do not have sufficient training budgets or ready-access to those professional organizations or their associated programs.
- Agree. We will investigate and include alternative methods for Continuing Education as part of the Advisory Group's efforts.
- We request that USDA-ARS participate in a working group to identify and help address special concerns associated with small, remote locations.
- DOE** **1** Most not if all Competencies should have some type of cover in any level of a person's career. Trying to define them at the Competency level will not work. We need to define which performance should be proficient in for each level.
- Agree. The core competency level is not granular enough to be meaningful for this analysis. The FBPTA Advisory Group will work to define this at the performance level starting with the "high-priority" competencies.

DOE **2** Remove the High Priority/ High Value information form the table. This does not give agencies any additional. This only adds a layer of confusion

Disagree. The prioritization of competencies is critical to understanding where and how to place emphasis for designing coverage of competencies across an organization, incorporaing this large and complicated competency model into human resources documents in a meaningful and effective way, and in assigning scarce resources for training. Agencies are free to disregard this guidance or assign their own priorities, however, it is critical to effective implementation that they do so.

DOE **3** The color code system is too confusing. Recommend having one color for each type. Also recommend having a Key for the

Agree. The color coding system has been simplified and a legend provided.

DOE **4** Several contractors that provide training for the Federal government are telling DOE that the paper work to file out for their classes to be acceptable by GSA is very burdensome. This could deter small businesses.

Partially agree. However, the form is based on a process in use by the Federal Acquisition Institute. It is clear that a proper review requires an appropriate level of rigor and consistency. We have worked with BOMI, DAU, FEMP, IFMA, and Penn State University to fill out the Submission form. If DOE has specific training providers that are detered we are willing to discuss specific feedback directly.

DOE **5** The document needs to cover Contractors. This document should let agencies know that this law is a requirement for Federal contractor, but at this time agencies should only trying and get their federal personnel in compliance until GSA has developed guidance for agencies.

Agree. A statement has been added to the Overview of the 2013 Update.

DOE **6** Move the Federal references to a Column to read just like a certification would. The will clean up the table and make it easer to read.

Disagree. The Federal References are defined as competencies in themselves, i.e. "Demonstrate familiarity with the SF Tool.", which seems to preclude them acting as qualifications. This suggestion will be posed to the Advisory Group as a possible change for the 2014 Update.

DOE **7** There are some Professional Engineer's License(s) that may meet some of the competencies. For example, Architectural Engineering

Agree. FMI will review the mapping of all professional licensures currently listed and consider reviewing additional licenses as resources permit.

DOE **8** I applaud the recognition for the need to make training available in areas that are key in developing and maintaining optimal competencies for facility personnel to support optimal real property management. At large facilities with large staff there is most likely appropriate resources to support this program. At small facilities with limited resources that will be problematic. Expect that at some future point, facilities will be audited against the Recommended Core Competencies for Federal Buildings Personnel as all elements being required. In response, in locations where resources are limited, there will be a reaction that will deplete needed resources in other areas. This will start the reaction chain as each area (when one individual has oversight responsibilities in multiple areas) is audited and found to not meet all the envisioned requirements. The reaction chain will promote and most often leads, to reactive rather than proactive management of federal resources in multiple areas. Throughout history this has ultimately been disastrous. There is a caveat in the recommendations document for support from remote locations for small facilities. Historically it has been proven out of site out of mind. A small site in a remote location that is hard and/or expensive to physically visit will get ignored and receive resource only on an emergency basis. Most likely those resources that come in from outside are unwilling to own the problematic issues and seek ways to delegate the issue resolution to the very personnel that did not have time to address it in the first place. The remote resources allocated to perform functions instead tend to delegate and thus the

Two points are raised here, the response is divided for clarity:

- Application at small facilities: Agree that we need to look at small facilities as a special circumstance given the unique nature of staffing (see similar USDA comments) and potential lack of technical capacity at the local level. FMI suggests establishing a working group to address the unique needs of the small, remote site as a special "sector."

- Resource application via "tailored approach (graded approach) or resource dedication": Agree that our approach must allow agencies flexibility while providing meaningful pressure to ensure the right resources are assigned where it makes operational or financial sense to do so. However, the FBPTA does not provide any authority or requirement to assign resources or alter facility management organizations. We welcome suggestions as to how the tailored or dedicated approaches might work and invite the commenter's participation in the small, remote site working group.

DOE **9** On Page 4, Figure 1, Competency Area #4 Energy Management and #8 Water Efficiency seems duplicate with #7 Sustainability. Because Sustainability covers both Energy Management and Water Efficiency already. This Act also has some duplication with GBC/LEED and Sustainability.

Partially agree. The processes of conducting energy, water and general sustainability management are unique enough to warrant separate competencies. There is some overlap of requirements to conserve energy and water in sustainability programs, however this is mostly a question of depth of knowledge. Note that Energy and Water are more technically involved competencies assigned to the "Energy Management" functional role where Sustainability is more general and aligned with the "Facility Management" role.

DOE **10** Though the draft update acknowledges that “Federal buildings personnel must demonstrate compliance with the parts of the model applicable to them and each Federal agency,” the fact remains that most of DOE buildings are managed and operated by contractors whose qualifications have to meet the applicable contract provisions. While Federal personnel oversee the contractors, they focus primarily on the outcomes, rather than processes – i.e., the “what” not “how” of building management. As such, the draft update is of limited relevance to DOE Federal personnel. As far as contractors are concerned, the proficiency requirements should be established through contractual means, as was contemplated in Section 2(f) of the FBPTA.

Note - The USGBC's LEED rating system is intended to provide a guide for the sustainable design and operation of the facility itself, whereas, the FBPTA Competency Model addresses skills requirements for the people who manage the O&M processes

Partially agree. The same situation exists with GSA's GS-1176 Property Management Community which oversees O&M contractor efforts typically through performance based contracts. GSA has used the FBPTA Competency Model, particularly, the "High-Priority" designated competencies to identify skills and required actions that will assist in oversight of these contractors. GSA worked with its internal collective bargaining representatives to ensure that the language used in updated Position Descriptions and Performance Plans is commensurate with the actual role played with these contracts. Enhanced technical capability will lead to better management of the contracts and the ability of the federal workers to act as partners with their contractor organizations. If the government is to maintain a facility management staff it must require the personnel in those roles to have a robust knowledge of these competencies so that they are more than simply another layer between the contractor and contracting officer.

DOE 11 Parts of the draft update are inscrutable. The document has a Flesch Reading Ease score of 21.2% (on a scale of 0 to 100% ease of readability) and a Flesch-Kincaid Grade Level of 14.9. We recommend that the document be rewritten at a grade level of 7 to 8. In addition, it would be helpful to include some detailed examples of how the revised competencies and updated curriculum can be applied to specific individuals.

Agree that specific examples would be helpful. We are in the process of updating the GSA PD, Performance Plan and creating a map of organizational coverage. These documents are in draft form and will be added to the 2013 Update as soon as finalized. Examples from other agencies such as VHA FM Academy will be added as available.

In general, we agree that we should hold to the precept "as simple as possible but no simpler." The target audience for this guidance is college-level professionals in the facility management and energy management career fields. The subject matter is also relatively complex. We have simplified this draft extensively resulting in a Flesch Reading Score of 30.5 and a grade level of 12.7. Further addressing the reading level may require greater specific example or recommendations from the commenter.

DOE 12 We have no way of ascertaining the validity of the percentages listed in columns L through CF. Accordingly, the basis for the percentages should be documented and the listed organizations afforded an opportunity to review them.

Agree, the percentages come from the mapping conducted by GSA of all qualifications currently listed on the Recommended Curriculum. GSA-FMI has developed a process for impartial, consistent third-party review of qualifications which includes public comment. The process is explained on FMI.gov; we are currently reviewing qualifications in priority order and will continue as far as resources allow.

DOE 13 Where the FBPTA system addresses the same personnel training requirements as an existing agency, contractually-required, regulatory-driven, or statutory-driven certification system, the existing system should not be replaced by the FBPTA system, nor should the FBPTA system be implemented in parallel with the existing system. This includes NNSA's Technical Qualifications Program, training certification programs required by quality standards such as NQA-1, ISO-9001, and ISO 14001, maintenance certification programs required by 10 CFR 830, skill certifications made by unions pursuant to collective bargaining agreements, and other activities predating the FBPTA. The implementing guidance needs to recognize the existence of certification programs that predate the FBPTA and formally recognize them as a way to certify compliance on a par with the other ways to certify compliance. This may be implicit in the ability of a supervisor to attest to the qualification of staff, but to ensure clarity and to avoid an explicit withdrawal of that option by a later interpretation the guidance needs to formally recognize and these pre-existing programs.

Agree. This is exactly the intent of the qualification review process developed by GSA. If existing certification systems are in place they can be mapped or cross-walked to the FBPTA Competency Model to show what competencies are covered. This mapping process has proven very useful to both GSA and the qualification providers. Please feel free to request a review of these existing Certifications using the process available at FMI.gov. Any planning for application of the requirements of the FBPTA to human capital documentation or training requirements should be discussed with collective bargaining units through pre decisional involvement.

DOE **14** The matrix of skills and knowledge is not based on any formal task analysis or other pedigree and cannot be presumed a priority to be complete. Most of it appears to be useful and relevant in some way, but it presents itself as being sufficient. It should include a disclaimer that while it is presented as necessary, it cannot be presumed as sufficient and that compliance with the FBPTA does not relieve supervisors of their accountability for ensuring that their staff is qualified to perform their duties.

Disagree. The FBPTA competencies are based on a series of JTA's conducted by NREL; additionally, professional associations have their own JTA-based competency models and have commented and contributed to the FBPTA model. It is true that no consistent, nationally-recognized JTA or accreditation standard exists either individually, or, across the functional roles impacted by the FBPTA. For this reason, GSA is working with DOE's Better Buildings Workforce Guidelines in attempt to establish a working model for this which will include national JTA and accreditation standards for training providers. Additionally, the Core Competency Web Tool allows agencies to incorporate on-the-job training and other practical developmental assignments into their approach to compliance. GSA will include a basic set of activities aligned with the "High-Priority" competencies internally. We will share examples of this as it is available.

DOE **15** Implementation of the FBPTA has the appearance of informal rule-making without the public comment and accountability provided by the Administrative Procedure Act. The FBPTA affects a wide range of federal staff and contractors and, to the extent that it requires training not being conducted prior to that act, will add substantially to the personnel costs associated with operation of federal buildings. Further, it will create additional administrative burdens and costs for small businesses. The wider implications of the implementation of the act should be understood before its implementation and incorporation into solicitations and contracts.

Partially agree. We agree there is need for vigilance and awareness on this point. GSA is not conducting "informal rulemaking" currently, but rather, facilitating a discussion among federal agencies about how to best prepare federal staff responsible for the operations and maintenance of buildings to operate in an increasing technical and resource constrained environment. GSA's efforts have been limited to supporting efforts by other agencies who are already looking at how they will update the qualifications of their personnel, and, by providing examples of GSA's efforts. Implementation of the FBPTA into solicitations and contracts requires greater understanding of potential impacts. So too will defining the specific methods of compliance for federal personnel. GSA will continue to work to clarify, share best practices and promote the professional development of federal staff based on the FBPTA Competency Model which is a living document that has been and will continue to be subjected to public comment. It is hoped these efforts will yield greater understanding of potential implications based on experience rather than projection. Any efforts to formally define compliance with the FBPTA across government or to apply the act to contracts will spring from the Advisory Group's efforts and will include public comment.