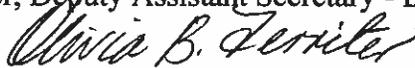


**DECISION MEMORANDUM FOR THE PRINCIPAL DEPUTY ASSISTANT SECRETARY – POLICY, MANAGEMENT AND BUDGET**

FROM: Kim Thorsen, Deputy Assistant Secretary - Public Safety, Resource Protection, and Emergency Services



Olivia B. Ferriter, Deputy Assistant Secretary - Budget, Finance, Performance and Acquisition



CC: Jim Douglas, Director, Office of Wildland Fire  
Douglas Glenn, Director, Office of Financial Management  
Denise Flanagan, Director, Office of Budget  
Martin Quinlan, Director, Business Integration Office

SUBJECT: Waiver of E-Gov Travel Service (ETS) Requirements for Casual Hires

**Introduction**

The DOI fire bureaus have the authority to hire casual employees (Casual Hires) to assist in coping with sudden and unexpected emergencies caused by a fire, or extreme fire danger, flood, storm, or any other all-hazard emergency that threatens damage to federally protected property, has the potential to cause loss of life, serious injury, public health risk, or damage to natural or cultural resources, unless brought under immediate control.

These Casual Hires are hired for temporary durations to assist with these emergency incidents. As federal employees, Casual Hires are entitled to reimbursement for travel expenses incurred. Approximately 33,000 payments are made annually for these travel expenses. The Federal Travel Regulations require utilizing an E-Gov Travel Service (ETS) for travel reimbursements. The DOI ETS is the Concur Government Edition or CGE.

This waiver is an opportunity to increase efficiency, eliminate undue burden and save an estimated \$556,000 annually by establishing a payment process outside of the DOI's travel system, CGE, for incidental travel related payments for these casual employees.

**Background**

Like all agencies, the wildland fire bureaus in the Department of the Interior utilize the ETS/CGE to process travel related reimbursements for short-term (one – three month) personnel called Casual Hires. The majority of these Casual Hires are hand crew members. Casual Hires are generally only entitled to incidental travel reimbursement, which is de minimis (e.g., \$5 per day). Paying Casual Hires through ETS/CGE requires the data entry of traveler profiles, travel authorizations, and multiple vouchers along with approvals for each. This is unnecessarily burdensome to bureau personnel and also triggers a \$14.75 fee, per voucher, to the General Services Administration. In other words, the GSA voucher fee alone usually exceeds the amount of the reimbursement provided to the Casual Hire. This disparity is compounded by the DOI staff costs incurred in processing the travel documents.

The FTR (§301-50.4) allows agency heads, or their designee, to grant a waiver to the required use of E-Gov Travel Service (ETS), on a case by case basis when, “Such use would result in an unreasonable burden on mission accomplishment.”

The bureau incident business leads, bureau fire directors, and the bureau Chief Financial Officers developed and approved a business case in support of a waiver to the required use of ETS/CGE and an alternative payment method for reimbursing Casual Hires. This business case details the use of Casual Hires in support of wildland fire response and the costs and administrative burdens associated with use of CGE. The Financial Officer’s Partnership community was briefed on the business case and agreed it did not present any significant internal control concerns and the travel payments could be easily monitored.

The DOI Solicitor’s Office reviewed the allowances for waivers of the FTR and concurred that this request may fall under the ‘case by case’ waiver described in the regulations due to the ‘unreasonable burden’. The circumstances, i.e. the “case” in which this waiver will be applied, must be narrowly tailored to address the identified, unreasonably burdensome process for travel reimbursements.

The U.S. Forest Service has been operating under a similar agency waiver for several years utilizing the same payment process noted below.

Over the last five years, the DOI fire bureaus have hired on average approximately 7,200 casual employees each year to support fire and all hazard incidents. The estimated number of travel payments for these employees is in excess of 33,000 annually which results in the estimated ETS/CGE processing costs of \$350,000 and administrative costs of \$206,000.

This waiver will allow travel expense payments for Casual Hires for their Privately Owned Vehicle (POV) mileage and incidental expenses and a maximum of 15 meals per payment to be included on the Emergency Firefighter Time Report (OF-288), which is the process used to make their salary payments.

The official electronic travel system, ETS/CGE, must and will continue to be used for Casual Hire travel reimbursement beyond the two reimbursable items identified in the preceding paragraph. Documentation currently used to support Casual Hire authorizations to travel will continue to be used to document the travel payment on the OF-288.

### **Decision Options**

1. Continue to function under the ETS/CGE requirements for processing the travel reimbursements for Casual Hires. Costs and workload for processing will continue to impact personnel and financial accounts.
2. Waive use of ETS/CGE for Casual Hires under the specific conditions that a Casual Hire has travelled to an incident and will incur only POV mileage and incidental expenses and up to 15 meals per payment. This waiver removes an unreasonable burden for the class of casual hires, as permitted under the FTR. Under the waiver travel reimbursement payments would take place through the Emergency Firefighter Time Report (OF-288).

The official electronic travel system, ETS/CGE, must be used for Casual Hire travel reimbursement beyond the stated reimbursable items granted by this waiver.

The Office of Wildland Fire and the Office of Financial Management, in coordination with the Business Integration Office, are responsible for implementing this waiver.

Implementation actions include:

- a. Issue appropriate policy.
- b. Modify the pay code table in Federal Personnel/Payroll System (FPPS) to associate pay code (TRAVEL) TRV to budget object class 211E for per diem and (COMMISSARY) CMN to budget object class 211P for POV mileage.
- c. Develop and test the Financial Business Management System (FBMS) import of FPPS to ensure travel data uploads correctly.
- d. Issue procedures for hiring offices to audit and process travel on the OF-288.
- e. Develop a spot audit schedule to ensure compliance to the new process.

**Recommendation**

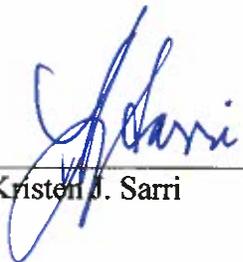
Option 2 removes undue burden, saves costs, and increases administrative efficiency, as well as brings the Department of the Interior procedures into alignment with the Forest Service. This option does not present any significant internal control concerns and the travel payments could be easily monitored.

**PRINCIPAL DEPUTY ASSISTANT SECRETARY'S DECISION**

APPROVE

DISAPPROVE

COMMENTS

  
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Kristen J. Sarri

11/20/2015  
Date