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Submitter Information

Name: Ivan . Graff
Address:

10904 Martha Drive
Silver Spring, MD, 20901

Email: ivan.graff@yahoo.com
Phone: 202-586-8120

General Comment

Dear TSP Team,

I would like to comment on the proposed changes to the TSP payment rates. It seems NRCS still has trouble determining how much it costs for agency personnel to provide technical services. The executive summary includes this sentence:

"Neither the 2004 nor the 2008 TSP Cost Benefit Analysis provides a cost comparison of TSPs costs with internal NRCS costs."

I guess all of those economic models have confounded field personnel and service providers alike:

"However, NRCS experience administering TSP authority over the past 5 years is that such rates based solely upon NRCS costs do not incorporate necessary profit margins to make such rates approximate the rate that the TSPs in the private sector actually charge for their services. NRCS believes utilizing procurement and market data will provide this additional cost consideration that will be considered more fair and reasonable by NRCS conservation program participants, which may increase their participation in the TSP program."

If TSP seeks a third-party means to avoid in-sourcing consulting services, then why not pay whatever it would have cost NRCS to do the work. Still having trouble reconciling NRCS overhead with by the job costs? Hire a firm like ZweigWhite or ReedBusinessData to study NRCS and arrive at these kinds of costs. Forget market surveys; you have tried that before.

Once you know what it really costs the taxpayers, annually forecast landowner demand for services, acquire IDIQ contracts in anticipation of demand, then NRCS should offer landowners a choice between NRCS and a small handful of regional firms under contract.

Field offices will not be "more fair" in setting payment levels. They know about as much about the free market as headquarters does. If anything, GAO will find more waste, fraud, and abuse. I do not think HQ really should resign themselves to this level of risk.

Take the brave step and really realign the program so it more closely matches government acquisition standards for professional services.

