



United States
Department of
Agriculture

Marketing and
Regulatory
Programs

Animal and
Plant Health
Inspection
Service

DECISION MEMORANDUM FOR THE UNDER SECRETARY

THROUGH: XXXXX XXXX
Administrator

FROM: XXXXX XXXX
Deputy Administrator
Program Analysis Services

SUBJECT: Organizational Change within APHIS Program Analysis Services

This package transmits the information requirements as outlined in Departmental Directive 1010-001 to request approval to effect an organizational realignment in the Animal and Plant Health Inspection Service (APHIS), Program Analysis Service (PAS).

Background and rationale for the proposed organizational changes

This reorganization is being proposed to support the President's National Export Initiative (NEI), Feed the Future Goals and Accountable Government Initiative. The March 11, 2010, NEI Initiative set the goal of doubling US exports in 5 years "by working to remove trade barriers abroad, by helping firms - especially small businesses - overcome the hurdles to entering new export markets, by assisting with financing, and in general by pursuing a Government-wide approach to export advocacy abroad, among other steps."

Internal to APHIS, this reorganization will support the NEI Initiative by providing expert analysis and support to APHIS Programs involved with international operations and export activity. It will increase PAS capability to evaluate Agency international programs using methods that produce valid and reliable information on foreign trade barriers or policies/regulations that hinder U.S. exports and their marketability.

The current Program Analysis and Assessment Branch has performed limited international assessment and evaluation of export activities. This unit will be replaced by a new unit titled International Program Assessment and Accountability (IPAA), with unit functions being expanded to support broader and more robust export initiatives.

In addition, the current Evaluation and Planning (EP) Branch will be abolished, with the positions being realigned into the new IPAA Branch. The EP Branch Chief position has been vacant for several months and over the last few years, most of the EP functions have been duplicated in other PAS Branches. As a result, the EP staff has become underutilized and their mission is unfocused. The reassignment of the remaining analyst positions to IPAA will further strengthen the new mission to evaluate international export systems, with the goal of facilitating the growth of U.S. exports.

Civil rights impact analysis

A Civil Rights Impact Analysis is attached. The analysis concludes that no adverse civil rights impact will result from the proposed organizational change (see Attachment A).

Functional statements

The revised functional statement reflecting the new IPAA unit functions within PAS are attached (see Attachment B).

Anticipated changes to the Agency's budget

The proposed reorganization does not affect the Agency's budget. The proposed changes will come from existing PAS funds. A signed notification from the Mission Area Chief Financial Officer is attached and certifies that financial and internal controls are adequate (see Attachment C).

One-time cost associated with the realignment of functions

There will be no one-time costs, such as relocation, severance pay, buy-outs, retraining, outplacement service, or lease termination, resulting from this expansion of functions.

Organizational charts

Current and proposed organizational charts reflecting the changes in PAS are attached (see Attachment D). The APHIS organizational chart will not change.

Labor relations certification

A statement certifying that there are no bargaining unit employees affected by this proposal is attached (see Attachment E).

Congressional notification

This proposal involves internal PAS structure only. Congressional notification is not necessary

Delegation of authority

The proposed establishment does not impact the APHIS Title 7, Code of Federal Regulations, Part 2, Delegations of Authority.

Changes required to the continuity of operation plan

There are no changes required to the Continuity of Operation Plan involved with the combining of these functions.

Effective date of requested changes

The organizational changes will be effective upon Under Secretary approval.

For answers to any questions you may have about this proposal, please contact Xxxxx
Xxxxx, Deputy Administrator, Program Analysis Services at (301) 734-6466, or Xxxxx
Xxxxx, Human Resources Policy Branch, Human Resources Division at (612) 336-3440.

DECISION BY THE UNDER SECRETARY

Approve: _____

Disapprove: _____

Discuss with me: _____

Date: _____

Attachments



United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Washington, DC
20250

MEMORANDUM

TO: Xxxxx Xxxxx
Deputy Administrator
Program Analysis Services

FROM: Xxxxx Xxxxx
Director
Civil Rights Enforcement and Compliance

SUBJECT: Civil Rights Impact Analysis
Organizational Changes in Program Analysis Services

USDA Departmental Regulation (DR) 4300-4, *Civil Rights Impact Analysis*, requires agencies to address civil rights implications of proposed actions, to include reorganizations, realignments, office closures and other actions impacting personnel and program beneficiaries. The Civil Rights Enforcement and Compliance (CREC) staff conducted a civil rights impact analysis of the organization changes in Program Analysis Services (PAS). The analysis was conducted pursuant to DR 4300-4 and addresses whether the proposed action will have an adverse civil rights impact on any employees or program beneficiaries, and applicants for employment or program benefits, based on their membership in a protected class.

CRITERIA/RATIONALE

PAS proposes to merge its Program Analysis and Assessment (PAA) and Evaluation and Planning (EP) functions in response to a change in mission to support the 2010 President's National Export Initiative (NEI), which set a goal of doubling US exports in 5 years "by working to remove trade barriers abroad." The current PAA Branch currently performs limited assessment of international operations; and the EP Branch is currently underutilized, with the Branch Chief and two other key positions being vacant. Merging PAA and EP into a new International Program Assessment and Accountability (IPPA) Branch will refocus efforts in support of the NEI initiative.

TIMETABLE

The reorganization will be effective as soon as approvals are obtained.

Xxxxx Xxxxx, Deputy Administrator

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EXISTING ORGANIZATION

PAS's existing organization consists of 6 support units: Emergency and Risk Assessment (ERA), Budget and Financial Analysis (BFA), Regulatory and Policy Analysis (RPA), Domestic Program Assessment and Accountability (DPAA), Program Analysis and Assessment (PAA), and Evaluation and Planning (EP).

PROPOSED ORGANIZATION

The proposed organization will include the new IPAA support unit. That unit will be in the same reporting structure as the other support units. The PAA and EP unit will be consolidated into the new IPAA unit.

SUMMARY OF CHANGES

The proposed change will merge all employees currently assigned to PAA and EP, to form the new IPPA Branch. A revised functional statement is attached. There will be no relocations of employees to other geographic locations. There will be no changes to any employee's grade or job series. The vacant Branch Chief position within EP will be abolished. The current Branch Chief for Program Analysis and Assessment will supervise the new IPPA Branch. None of the employees assigned to the new branch will be retrained. No CTAP, relocation, or other assistance is planned because no employees will be relocated or subject to reduction in force.

WORKFORCE PROFILE AND IMPACT

The workforce profiles of affected employees who will be realigned are listed in the table below.

Race	Gender	Series/Grade	Position/Title
White	Male	GS401/14	Biolcl Scientist
White	Male	GS401/14	Risk Assessment
White	Female	GS401/14	Biolcl Scientist
White	Female	GS401/14	Biolcl Scientist
White	Male	GS401/14	Entomologist
White	Female	GS301/9	Program Specialist
Black	Female	GS343/13	Program Analyst
Black	Female	GS301/9	Program Specialist
White	Male	GS110/14	Ag. Economist
White	Female	GS890/14	Agri Engr.
-	Female	GS303/4	Ag. Economist
White	Male	GS701/15	Vet. Medical Off.
Black	Male	GS890/14	Agri. Engr.

CURRENT PAS TOTAL MALE FEMALE PROFILE BY PERCENTAGE	
MALE	FEMALE
34%	66%
IPAA MALE FEMALE PROFILE FOR EMPLOYEES ASSIGNED TO ERAS BY PERCENTAGE	
46%	54%

CURRENT PAS TOTAL MINORITY NON-MINORITY PROFILE BY PERCENTAGE	
MINORITY	NON-MINORITY
25%	75%
IPAA MINORITY NON-MINORITY PROFILE PERCENTAGE EMPLOYEES ASSIGNED TO NEW ERAS	
25%	75%

CURRENT PPD TOTAL WORKFORCE PROFILE BY PERCENTAGE										
WM	WF	BM	BF	HM	HF	AM	AF	NAM	NAF	Disability/ Age+40
25%	49%	5%	9%	0%	1%	3%	8%	0%	0%	3%/69%
RAS WORKFORCE PROFILE FOR EMPLOYEES ASSIGNED TO NEW ERAS BY PERCENTAGE										
42%	33%	8%	17%	0%	0%	0%	0%	0%	0%	0%/85%

ANALYSIS

The following comparisons use minus (-) to indicate that the percentage representation of the group assigned to move was less than that same group's representation in the overall PPD workforce; plus (+) indicates assigned to move group representation was greater than its overall workforce representation. Comparison of representation of employees over age 40 found a +16% difference. When comparing minority representation with non-minority representation the difference is 0%. A similar type comparison for female representation showed -12%. There was no disability representation in the group assigned to move. Review of each race/gender group showed that the representation for the group assigned to move exceeds their overall workforce representation in 3 of 4 protected groups (the remaining 6 groups were not represented in the staff assigned to move). Two of those 3 groups are minority, but we noted that there was no difference in the overall minority non-minority comparison.

Xxxxx XXXXX, Deputy Administrator

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CREC's review found no information that would indicate an adverse civil rights impact on program beneficiaries. The public and stakeholder's ability to receive APHIS programs and activities will not change as no PAS employee's job duties or current geographic location will change. It is anticipated that the addition of the IPPA unit will achieve great work efficiencies to support the goal of increasing U.S exports.

In summary, our review found no information to indicate an adverse civil rights impact on employees or program beneficiaries, or applicants for employment or program benefits, based on their membership in a protected class. If there are any changes to the proposed restructuring, PAS should notify CREC immediately so an assessment can be made to determine whether this CRIA should be modified.

If you require additional information, please contact me at (301) 734-6466.

**ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PROGRAM ANALYSIS SERVICES
34-02-01-05
INTERNATIONAL PROGRAM ASSESSMENT AND ACCOUNTABILITY**

Assignment of Functions:

Works with APHIS domestic and international leaders and staff to collect and analyze market and commodity information needed to provide Program direction on export opportunities:

- set up systems to monitor program results and their relationship to cost
- monitor and evaluate customer and stakeholder expectations and satisfaction
- evaluate Agency international programs using methods that produce valid and reliable information on exports and existing foreign trade barriers or policies that hinder U.S. exports
- analyze the context in which APHIS international programs are conducted

Researches foreign import processes and identifies bottlenecks that impede U.S. export opportunities. Works with leaders to integrate systems for planning, evaluating, and monitoring to ensure U.S. export processes meet the needs of domestic and international customers, stakeholders, and employees.

Conducts short and long term analyses of international export issues, programs, and policies using econometric analysis, benefit-cost analysis, and other analytical techniques to provide top management with estimates of the impacts of alternative policy options.

Analyzes the impacts of APHIS regulations on U.S. export products and their marketability. Conducts regulatory flexibility analyses to determine the impact of proposed regulations on exports and to analyze alternatives to minimize the impact.

Provides analytical support for Agency/Interagency committees, task forces, and projects. Organizes and coordinates interdisciplinary committees to identify critical issues, analyze potential impacts, and provide recommendations for the Administrator.

Represents APHIS in International economic and policy analysis. Serves as liaison with OMB, USDA Department Offices, and others regarding economic impact analyses and foreign export opportunities.

Identifies, develops, evaluates and refines technologies, methods, approaches, and information associated with risk analysis to mitigate foreign pest and disease concerns for U.S. plant and animal exports.

Conducts economic and other analyses of Agency issues, programs, and regulations and their impact on export development opportunities and provides guidance to APHIS staffs on analytical techniques.



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Washington, DC
20250

TO: XXXXX XXXXX
Acting Chief Financial Officer

FROM: XXXXX XXXXX
Chief Financial Officer
Marketing and Regulatory Programs

SUBJECT: Human Capital Reorganization Notification to the Chief Financial Officer
Concerning Internal Controls.

As the Chief Financial Officer of the Animal and Plant Health Inspection Service (APHIS), I have reviewed the human capital adjustments that will result from the proposed merging of functions within the Program Analysis Services (PAS) staff.

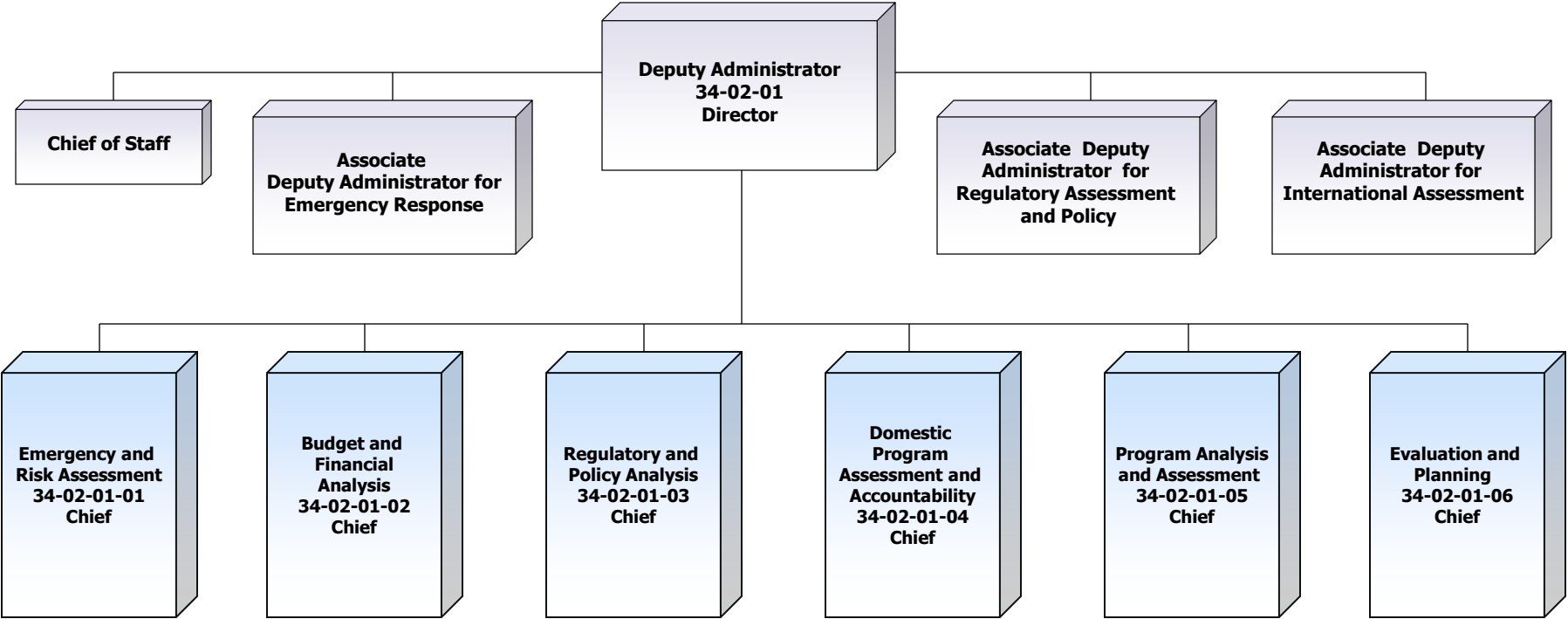
PAS is seeking approval to consolidate underutilized units and create a new International Program Assessment and Accountability unit. The unit chief will report to the Deputy Administrator of PAS, consistent with the current reporting lines of the other units.

The new unit in PAS will use the established procedures and internal controls that are adequate to safeguard assets and ensure proper accounting and reporting of income, expenditures, obligations, asset purchases, asset dispositions, and liabilities.

Please contact me at 301-734-3440 if you have any questions.

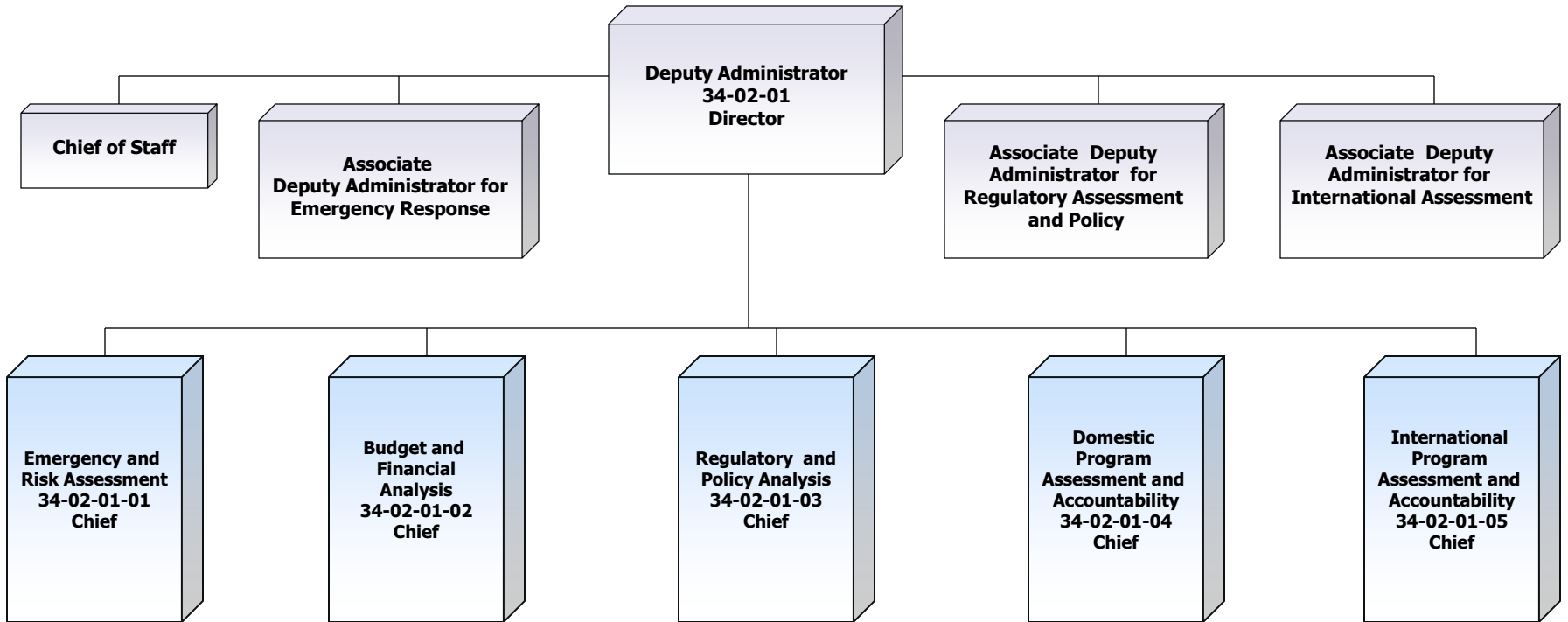
Program Analysis Services (Current) 34-02

Attachment D



Program Analysis Services (Proposed) 34-02

Attachment D





Attachment E

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Inspection
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Washington, DC
20250

TO: XXXXX XXXXX
 Deputy Administrator
 Program Analysis Services

FROM: XXXXX XXXXX
 Labor Relations Specialist
 Marketing and Regulatory Programs
 Human Resources Division, Labor Relations

SUBJECT: Organizational Realignment

APHIS' Policy and Program Analysis Services (PAS) employees are not covered by a recognized union. As such, there are currently no obligations to notify, consult, and/or negotiate with a union as a result of the proposed organizational change.

Please contact me at 301-734-6466 if you have any questions.