

**Emergency Processing for NASA Benchmarking of Program Office Size,
Structure and Performance (5CFR 1320.13)**

1320.13 Emergency processing

An agency head or the Senior Official, or their designee, may request OMB to authorize emergency processing of submissions of collections of information.

(a) Any such request shall be accompanied by a written determination that:

(1) The collection of information: (i) Is needed prior to the expiration of time periods established under this Part; and (ii) Is essential to the mission of the agency

(i) NASA has undertaken a study of Program Office Size, Structure and Performance in Corporations to explore successful corporate practices and evaluate their potential for application to the President's Vision for Space Exploration at the direct request of the NASA Administrator. It is critical that the study be completed by March 2007 to enable incorporation of findings in the Vision for Space Exploration Program. This information collection activity, i.e., benchmarking organizational structure and staffing best practices, needs to be completed by March 30, 2007 for two reasons: (1) the fixed price support contract for this information collection activity will end, and (2) it is anticipated that the organizational structure and internal program processes of the Exploration Program will be finalized by May-June 2007. It is critical that the results of this information collection be input into the decision making process for establishing a more efficient and effective organizational structure for the Exploration Program.

(ii) If NASA is to execute an Exploration Program that is constrained to funding on a "go as you pay" basis, without benefit of significantly augmented appropriations, then NASA must pursue any avenue that enables it to more efficiently structure and size its program offices. The Exploration Program must also be structured such that it is sustainable through a much longer time horizon than the previous manned missions, as it will not be executed as a "sortie," but rather as a construct that moves through a series of building blocks that may ultimately take manned presence well beyond the lunar surface. NASA has already established a Constellation Program Office and is in the process of completing the staffing of that entity. The benchmarking data must be collected and evaluated as soon as possible in order for NASA to realize the full value of corporate best practices.

(2) The agency cannot reasonably comply with the normal clearance procedures under this part because: (i) Public harm is reasonably likely to

result of normal clearance procedures are followed; (ii) An unanticipated event has occurred; or (iii) The use of normal clearance procedures is reasonably likely to prevent or disrupt the collection of information or is reasonably likely to cause a statutory or court ordered deadline to be missed.

(i) A fixed price contract has already been let to conduct the planned interviews and workshops and absent an authorization to proceed, NASA will have defaulted on its commitments to support the schedule embedded in the contract. The contract baseline assumed a completion date of March 30, 2007, with the fixed price reflecting the planned initiation of interviews in the late fall of 2006. Inability to proceed in a timely manner will result in increasing contract costs, as the period of performance will have to be further extended and the contractor workforce that is currently dedicated to this undertaking will not be able to return to the full productivity anticipated in the fixed price commitments. In short, the study will prove to be far more expensive than necessary.

If normal clearance procedures are followed, OMB clearance would probably not occur until May or June. This delay would cause the companies and corporations to have to re-plan and reschedule the interviews and benchmarking workshops that have already been planned. Many of the interviewees will be CEOs, Vice Presidents, CIOs, and Senior Officials in Program Management Offices. This rescheduling will create an undue burden on their time and capital overhead, resulting in many interviews not being rescheduled, but cancelled and consequently weakening the results of information collection. Most importantly, the window of opportunity for providing timely input into the planning and staffing of the Exploration Program structure will be lost. It is anticipated that the organization structure and staffing of the Exploration Program will be completed in the May-June 2007 time frame. Input into the organization structure and staffing decision making process has to occur in the March-April 2007 time frame.

The contractor has established the content that will be explored in the interviews and workshops and has begun soliciting voluntary participants. As indicated above, the initial planning called for initiation of the interviews in December 2006. Substantive delays in initiating the interviews and workshops will also reinforce commonly held corporate perceptions of inefficient and ineffective federal bureaucracies. It should be noted that the majority of participants solicited to date have no supplier/customer relationship with the Agency nor do most of them realize significant incomes from sales to the U.S. Government.

(ii) Not applicable.

(iii) Given the fact that the contract is in place, costs continue being incurred, corporate goodwill may be lost, and the window of opportunity lost to help restructure the Exploration Program organization and staffing, NASA urgently

needs approval of this emergency request. If NASA were to have to wait for the standard review cycle, the study would not meet the requirements of the NASA Administrator and a significant loss of taxpayer resources would occur.

(b) The agency shall state the time period within which OMB should approve or disapprove the collection of information.

NASA needs approval of this emergency request by the end of December to minimize the cost growth associated with further delays in initiating the effort. Further slippage will result in additional costs to be borne by the U.S. taxpayers, as noted above.

(c) The agency shall submit information indicating that it has taken all practicable steps to consult with interested agencies and members of the public in order to minimize the burden of the collection of information.

No information is being solicited from the general public. Corporate participation in the study is entirely voluntary. Corporations agreeing to participate in the benchmarking will realize an estimated net benefit of \$50,000 resulting from the report that will be provided back that enables them to see where their corporation falls relative to the remainder of the corporate participants. Of approximately 11 corporations that have been contacted by HSKNI to date, 10 have already agreed to participate. In these corporations, NASA has received offers of internal sponsorship for the benchmarking from CEOs, Vice Presidents, CIOs, and Senior Officials in Program Management Offices.

(d) The agency shall set forth in the FEDERAL REGISTER notice prescribed by 1320.5(a)(1)(iv), unless waived or modified under this section, a statement that it is requesting emergency processing, and the time period stated under paragraph (b) of this section.

A Federal Register notice has been filed (Federal Register Vol. 71, No. 245, Thursday December 21, 2006, Page 76701).