

United States Department of the Interior Office of Aviation Services 300 E Mallard Drive, Suite 200 Boise, Idaho 83706-3991

DOI OPERATIONAL PROCEDURES MEMORANDUM (OPM) - 08

Subject: Acquisition, Management and Disposal of Fleet Aircraft

Effective Date: January 1, 2024

Last Updated: October 12, 2023

Expiration: December 31, 2024

1. <u>Summary of Changes.</u> The Executive Aviation Subcommittee (EAS) reviewed and concurred with the following changes.

An extensive update was made to the OPM to ensure it was up to date with the current Office of Management and Budget (OMB) Circulars, CFRs and Federal Management Regulations. The scope of the OPM was expanded to include the purchase, management and disposal of all aircraft within the Department of the Interior. Specifically, additional information was added to paragraphs 5 and 6 about aircraft management and aircraft disposal.

- 2. <u>Purpose.</u> To implement policy and procedures ensuring compliance with Office of Management and Budget (OMB) Circulars A-11, A-76, A-126 and 41 CFR 102-33, Federal Management Regulation; Management of Government Aircraft. Similarly describe processes to be followed within the Department of aircraft acquisition, maintenance, and management when specific budgetary authority is not required (e.g., for replacement aircraft purchased with Aviation Working Capital Fund reserves
- **3.** <u>Scope.</u> This OPM applies to the purchase, management, and disposal of aircraft within the Department of the Interior.
- 4. <u>Background.</u> The Government should have a high level of assurance that the funds dedicated to capital acquisitions support the agency mission and provide value to the taxpayer. In addition, agencies should be able to justify the acquisition and operation of an asset. The generation of a sound business case is a best practice for providing that justification and assurance. A business case should include the rationale for the investment and reference any supporting analysis.

The Aircraft Capital Asset Planning (CAP) Guide stipulates that an A-11 Aviation Business Case Summary (ABCS) is required for all acquired aircraft. Further, federal agencies are required to periodically review and evaluate submitted ABCS in a five-year cycle. Aircraft not accounted for under previously submitted ABCS must be baselined from the current fiscal year forward. This entails forecasting an aircraft's life cycle, life cycle costs, and major component replacement schedules.

5. <u>Policy.</u> The application of policies and procedures outlined in this OPM, and its appendices, are the joint responsibility of Office of Aviation Services (OAS) and each bureau within the Department which uses or operates government aircraft in the performance of their mission. To ensure the Department can provide evidence, on demand, of sound capital investment in aviation assets, an ABCS must be approved and on file for each aircraft or class of aircraft in the DOI inventory. These ABCSs will reside on the Government Services Administration (GSA) Federal Aviation Interactive Reporting System (FAIRS) website in a manner which is accessible to OMB and GSA. Record copies of these business cases will be maintained by OAS. This policy applies to only crewed aircraft. For uncrewed aircraft see OPM-11.

A. Aircraft Acquisition:

All requests to purchase aircraft require bureau approval and concurrence from the OAS Director. Additional consensus or approvals may be required based on acquisition costs. Specific approval thresholds are outlined below in Chapter 12, a-c.

B. Aircraft Management:

Agencies shall operate government aircraft only for official purposes. Official purposes include the operation of government aircraft for mission requirements, and other official travel.

- 1) Financial management and use reporting: Federal Business Management System (FBMS) is the system of record for aircraft financial information and use data. Timely and complete reporting of flight time is critical to ensuring aircraft cost recovery and use is accurately calculated.
- 2) Aircraft maintenance: Crewed aircraft maintenance coordination is performed based on the geographic assignment of the aircraft. Aircraft assigned to Alaska or Hawaii are maintained through coordination with OAS Alaska Regional Office (AKRO). Aircraft assigned to L-48 are maintained through coordination with OAS Technical Services.
- C. Aircraft Disposal

OAS is an authorized GSA Sales Center for the sale of DOI fleet aircraft. The sale of Alaska and Hawaii based aircraft will be coordinated through AKRO. The sale of L-48 based aircraft will be coordinated through the OAS L-48 Fleet Manager. The proceeds of an aircraft sale may be used to offset the costs of the replacement aircraft, provided current appropriations law authorizes this use or it is approved by GSA through Exchange Sale Authority.

6. <u>Procedures.</u>

- A. Aircraft Acquisition
 - OMB Circular A-11 allows agencies the flexibility of grouping aircraft collectively by mission, region, or geographic location, DOI will exercise the option to create baseline ABCSs on the following "groups" of aircraft. Individual baseline ABCSs must be completed on all aircraft not falling within one of these classes.

- a. Tandem survey
- b. Piston Single utility/survey
- c. Piston Twin utility/survey
- d. Turbine Single utility/survey
- e. Turbine Twin utility/survey
- f. Piston helicopter
- g. Turbine single helicopter
- h. Turbine Twin helicopter
- 2) ABCSs will contain five-year lookback charts depicting hours flown, operating costs and mission type percentages for each aircraft. Planned replacement year must be documented for each aircraft. Baseline ABCSs are also required to forecast anticipated costs out to current fiscal year plus two. Each year at the fleet rate meeting, participants will review actual costs and flying hours against the forecast numbers and determine if there any outliers that require action. The information, in executive summary format, will be submitted to the DOI Executive Aviation Committee (EAC) when requested.
- 3) All requests to acquire a fleet aircraft begin with submission of an OAS-13F (Request for Aircraft Acquisition) to OAS Division of Technical Services.
- 4) OAS Technical Services personnel will assist bureau points of contact (POC) in completing the OAS-13F. The OAS Fleet Accountant must verify the estimate of expected exchange sales proceeds and availability of Aviation Working Capital Fund (WCF) reserves in the funding plan. Bureau funds certifiers must provide the FBMS accounting code for any direct bureau contribution to the acquisition.
- 5) Once the OAS-13F has been completed and signed by the bureau National Aviation Manager, Technical Services will assist the requesting bureau in completing the ABCS and provide the bureau POC with five-year lookback data for the flying hour and mission history charts for the ABCS.
- 6) If the acquisition request is for an aircraft to service a new mission or mission location for which a baseline ABCS has not previously been submitted and approved, the ABCS must compare and evaluate at least three alternate aircraft and a Contractor Owned/Contractor Operated (COCO), Contractor Owned/Government Operated (COGO), or Government Owned/Contractor Operated (GOCO) option, as appropriate.
- 7) If the requested aircraft is a different make/model, with significant cost/performance differences, from that currently operated, the ABCS must document the reasons (e.g., new mission responsibilities) for the change. In this case the ABCS must compare cost estimates for the current aircraft (status quo), the proposed aircraft, one additional aircraft that meets or exceeds mission requirements and the COCO/COGO/GOCO option.
- 8) If the requested aircraft is the same make and model as the current aircraft *OR* has been designated as the Department standard make and model for that class/grouping of aircraft, the comparison must include the current aircraft, the proposed standard aircraft, and the COCO/COGO/GOCO option.

- 9) In each of the three cases above (6,7,8) evaluation of the COCO/COGO/GOCO option will ensure that an OMB Circular A-76 comparison is accomplished even though one may not be currently required by OMB.
- 10) To support a request for budgetary authority in a Congressional appropriation, an Aviation Business Case in the format required by OMB Circular A-11 (see Attachment 2 for sample) must be submitted with the appropriate fiscal year budget request by the deadline established by OMB in their FY budget summary.
- 11) Aircraft transfers (within a single bureau or between two bureaus) which result in changes in make/model or mission must adhere to the ABCS requirements listed above (6,7,8).
- 12) Acquisition thresholds and approval levels
 - a. Less than \$2 million threshold, once the Bureau EAC member and OAS Director have documented their concurrence and approval, OAS Technical Services will provide informational copies of the package to each EAC and EAS member and document the date these copies were distributed.
 - b. For acquisitions in the \$2 million to \$10 million range, EAC members will document their concurrence by signature on separate signature sheet provided by the OAS Director. The OAS Director's signature indicates that EAC consensus has been obtained. Following EAC approval, OAS will provide an information copy of the ABCS package to the Office of Acquisition and Property Management (PAM), when requested.
 - c. For acquisitions with a cost <u>equal to or greater than \$10 million</u>, DOI Executive Aviation Board (EAB) members will document their concurrence by signature on the ABCS. Once the ABCS package has been approved by the EAB, OAS shall provide an information copy to PAM.
- 13) Once the ABCS has been approved at the appropriate level and necessary budgetary resources have been approved, OAS, in coordination with the requesting bureau and IBC/AQD, may proceed with actual procurement of the aircraft. If the funding plan depends on the proceeds from the exchange sale of an aircraft being replaced, the bureau is authorized to "borrow" funds from the WCF equal to the anticipated proceeds until such time as the replacement aircraft has been purchased and the old aircraft is sold. EAC members will document their concurrence by signature on the ABCS.
- 14) Each aircraft or aviation cost comparison will be uploaded as an ABCS in GSA FAIRs, accessible to the GSA Office of Aircraft Management Division. and to OMB, as required by OMB Circular A–11, to justify aircraft purchases.

B. Aircraft Management

1) Financial Management

- a. The cost effectiveness and utilization of all fleet aircraft managed by OAS is documented in the Annual Aircraft Account Audit (A4) report. This report compiles and tracks all aircraft costs. Five-years of utilization is used to establish future rates for the recovery of aircraft operating costs and establish utilization thresholds for future use. This report is provided to bureau partners for review and used to establish utilization targets, and cost recovery (through a rate structure) of DOI crewed aircraft.
- b. The Fleet Information Document (FID) is an annual agreement establishing continued need for each DOI fleet aircraft. FIDs are created for DOI fleet aircraft and provided to the using bureau/office, each bureau/office agrees on the rate structure and funding information. Completed FIDs are signed by the OAS Fleet Accountant and the responsible representative for each aircraft. The FID is a binding agreement with the bureau/office partners for cost recovery through the rate structure established for that year.
- 2) Use Reporting

All uses of government aircraft must be documented, and this documentation must be retained for at least two years. At a minimum, the documentation of each use of government aircraft must include:

- a. The tail number of the plane used.
- b. The date(s) used.
- c. The name(s) of the pilot(s) and flight crew
- d. The purpose(s) of the flight
- e. The route(s) flown.
- f. The names of all passengers

FBMS serves as the system of record for most aircraft use information. The preferred method for documenting aircraft use is the Aircraft Use Reporting and Management Application (AURMA). Pilots not reporting through AURMA must use an agency approved method which ensures timely and sequential reporting of aircraft use. Passenger names are not entered into the AURMA or FBMS. Passenger names will be retained at the bureau level. For SES passengers see OPM-7.

- 3) Aircraft Maintenance
 - a. Aircraft availability is determined by referencing the Aircraft Status Log (OAS-2) and aircraft status sheet. DOI pilots must ensure there are no open discrepancies. Open discrepancies must be corrected prior to flight. Pilots will compare projected mission times with the next required inspection or maintenance item due to ensure overflight does not occur and maintenance is coordinated around mission needs. The next inspection will be documented on the OAS-2 from the previous maintenance return to service and/or an aircraft status sheet (short list) supplied by the fleet manager/scheduler.
 - b. Scheduled, unscheduled and early inspections are coordinated through the appropriate fleet manager/scheduler. OAS's fleet manager/scheduler will coordinate with the maintenance facility performing the necessary maintenance.
 - c. Upon completion of aircraft maintenance, the appropriate fleet manager/scheduler will confirm the requested work was completed and signed off correctly, create a new status sheet and distribute it to the pilot for inclusion in the OAS-2.
 - d. The receiving pilot will:
 - I. Performs a visual inspection and any operational checks, including OAS-2 verification/sign off.
 - II. Ensure upcoming maintenance is documented correctly.
 - III. Add new aircraft status sheet to the OAS-2.
- C. Aircraft Disposal

Aircraft and aircraft component disposal is initiated by submitting an OAS-75 Aircraft Disposal Form <u>https://www.doi.gov/sites/doi.gov/files/oas-75.pdf</u>. For Alaska and Hawaii based aircraft, disposal will be coordinated through the AKRO. For L-48 based aircraft, disposal will be coordinated through OAS L-48 Fleet Manager. Funds recovered from an aircraft disposal have specific criteria and timeframes for use. Bureaus must coordinate with the OAS Fleet Accountant prior to initiating an OAS-75

Susan E. Bates Director, Office of Aviation Services

Attachments: OAS-13F <u>OAS- 13F Request for Acquisition of Fleet Aircraft.pdf</u> Aviation Business Case Worksheet Aircraft BCS Template.docx