

# THE BUSINESS REFERENCE MODEL VERSION 2.0: Comment Response Document

Response to Comments on Version 1.0 and  
Draft Version 2.0 of the BRM



**FEAPMO**

FEDERAL ENTERPRISE ARCHITECTURE  
PROGRAM MANAGEMENT OFFICE

The Federal Enterprise Architecture Program Management Office

*The Business Reference Model Version 2.0:  
Comment Response Document  
June 2003*



## INTRODUCTION

On July 22, 2002 the FEA-PMO released the foundation of the FEA Reference Model Framework – Version 1.0 of the Business Reference Model (BRM) – pictured in Figure 1 below.

In designing Version 1.0 of the BRM, the FEA-PMO collected and analyzed high-level business architecture information from agencies across the Federal government. A draft model was released, agency comments were collected and addressed, and the final version was release shortly thereafter. The BRM Version 1.0 contained three Business Areas, 31 Lines of Business, and 132 Sub-Functions.

This document summarizes the responses the FEAPMO prepared to Agencies' comments on both the Business Reference Model (BRM) Version 1.0 and the draft BRM Version 2.0. For a copy of the BRM Version 1.0, as well as definitions for the Lines of Business and Sub-Functions contained within the models, please see the FEAPMO website at [www.feapmo.gov](http://www.feapmo.gov). The website contains a wealth of information on the FEA effort, including the revised model – Business Reference Model Version 2.0 – and its definitions.

## BRM VERSION 2.0 DEVELOPMENT PROCESS

Once Version 1.0 was released, the FEA-PMO began to collect comments in preparation for Version 2.0 of the model. An official comment period was held throughout the month of December, and work commenced on the design of a draft BRM version 2.0 in the beginning of 2003. All comments were tracked and managed in the FEA-PMO's comment tracking database.

The draft Version 2.0 of the BRM was released for Agency comments and validation on March 3, 2003. Validation reports were sent out to an initial group of agencies with a request for comments on the draft BRM Version 2.0 and on the mapping of the proposed business lines and sub-functions to agencies. Agency comments were received from March 1 through March 24, 2003 and were organized according to their area (i.e., business model comments, agency mappings). All comments were carefully tracked and addressed and the final version of the model was completed. BRM Version 2.0 contains four Business Areas, 39 Lines of Business, and 154 Sub-Functions. BRM Version 2.0 is pictured in Figure 2.0 on the following page.

**Figure 1: The Business Reference Model Version 1.0 was released on July 22, 2002**



## DOCUMENT OVERVIEW

The comments and responses in this document are organized by the area of the BRM that they address. The sections begin with general comments on the BRM followed by more specific comments on each Line of Business according to the layout of the BRM. All comments have been edited for clarification and the preservation of anonymity.

The order of comments is as follows:

### GENERAL COMMENTS

- Development of the BRM
- Scope
- Scope and Nomenclature

### SERVICES FOR CITIZENS COMMENTS

- General
- Budget Code Alignment
- Economic Development
- Education
- Environmental Management
- Natural Resources
- Community and Social Services
- International Affairs and Commerce
- Disaster Management
- General Science and Innovation
- Health

- Workforce Management
- Law Enforcement
- Homeland Security

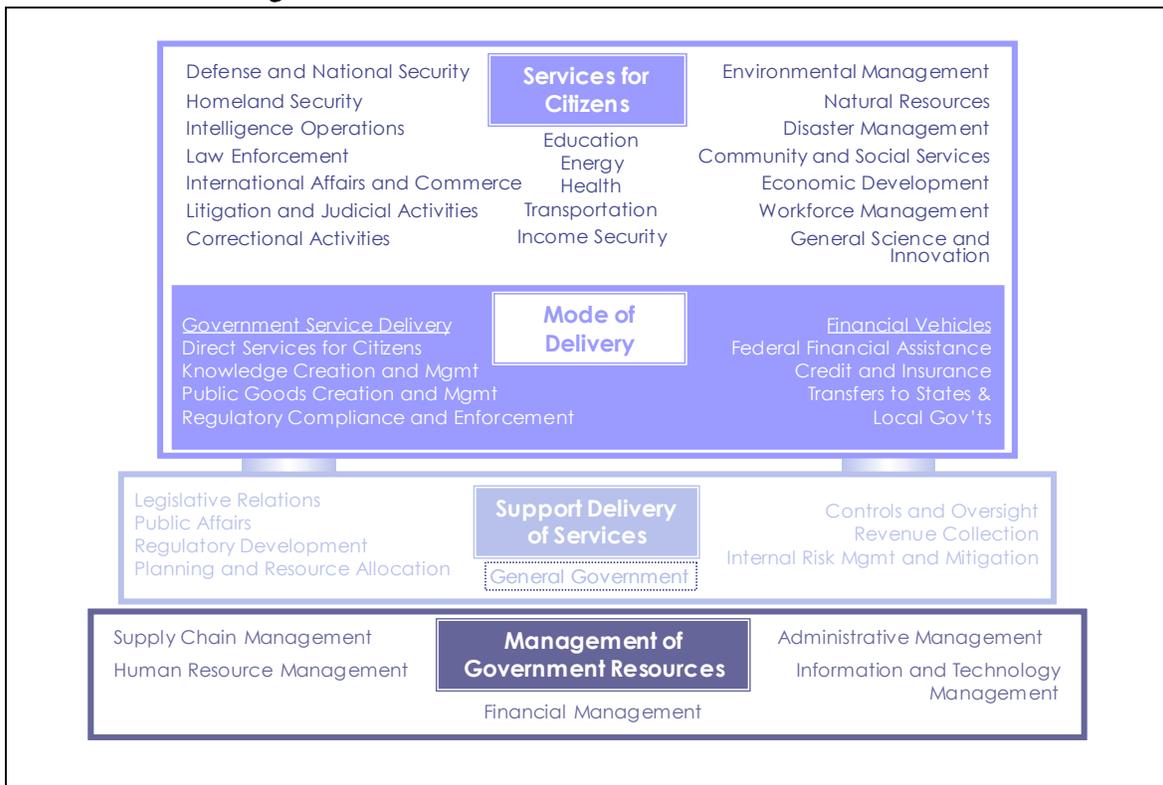
### SUPPORT DELIVERY OF SERVICES COMMENTS

- "General Government" and Cross-Agency Government Services
- Planning and Resource Allocation
- Controls and Oversight
- Legislative Relations
- Public Affairs
- Revenue Collection

### MANAGEMENT OF GOVERNMENT RESOURCES COMMENTS

- Information and Technology Management
- Financial Management
- Administrative Management
- Human Resource Management

**Figure 2: The Business Reference Model Version 2.0**



## GENERAL COMMENTS

### DEVELOPMENT OF THE BRM

#### Involving the business leaders in the development of the BRM

**Comment:** *We believe that to produce a business-focused document, Agency business communities should be involved in reviewing and approving the document. We strongly believe that a comment period should be provided for the BRM and addressed to the Business Managers in all of the agencies, and in particular, to the strategic planning/GPRA communities and the budget communities. Currently, the entire architecture effort suffers from the time-honored problem of being addressed largely or completely in the world of information technology. Let's keep in mind this is the business reference model, yet it does not appear to have been vetted to the business community!*

Response: The FEA-PMO agrees and is working diligently to bring Federal business communities to the table. This has already begun within the Office of Management and Budget and in many, but not all, federal agencies. We will continue to make this a high-priority as we establish the Federal Enterprise Architecture.

#### Stability of the BRM and cost-effectiveness of mapping for Agencies

**Comment:** *Since the BRM is still being changed, alignment of agency internal BRMs aims at a moving target until the BRM stabilizes. Those seeking EA approvals must continue to view projects in relation to two BRMs (internal and FEA) as they go through the budget process. When will the BRM be stable enough to make alignment with agency BRM's cost-effective?*

Response: Since its inception, the BRM has been described as a dynamic model, meaning that it will continue to be refined to improve its utility to the federal agencies. That being said, the FEA-PMO understands the concern of the commenter. We think BRM v2.0 signifies a major advancement in the utility of the BRM, and we do not foresee the need for such a comprehensive change in the future. As far as the cost-effectiveness of BRM-alignment is concerned, the FEA-PMO does not have insight into the business architectures of every federal agency. This is, in fact, the reason for the BRM's existence -- to develop a common vocabulary with which to describe the business of the federal agencies. Some agencies have found alignment very simple, others have found it more challenging. The FEA-PMO and the Federal CIO

Council are working to develop materials that should simplify this process for all agencies and make the cost-effectiveness of BRM alignment much less of an issue for a specific agency. In addition, the potential for government-wide cost savings and improved government performance that could be realized from the BRM warrants its continued development and refinement.

#### More guidance is needed

**Comment:** *In February of 2003, OMB introduced two new models: the TRM and the SRM. At this juncture, the BRM is being updated. Soon to be released is the PRM. The SRM, and now this BRM, represent a major shift from the current enterprise architecture direction and deliverables, and requires Agencies to re-work their EA efforts. The PRM is expected to follow suit. It is unclear what OMB is trying to accomplish with these new approaches, and what Agencies will be asked to do with this information. It would be helpful if OMB provided an overall document that shows where EA is headed in the Federal Government. There has been much talk of an updated version of the FEA. This is very much needed, but in its absence, perhaps OMB could communicate informally, the intent of these models and how they will contribute to OMB and Agency decision making. It would also be useful to understand both the impact that these models will have on existing efforts and benefits expected in return as well as transition timeline.*

Response: The FEA-PMO and Federal CIO Council are developing materials to assist agencies in the use of the FEA Reference Model Framework. For the time being, the release document associated with each of the reference models should answer many of the commenter's concerns.

### SCOPE AND APPLICABILITY

#### Should ancillary functions be included?

**Comment 1:** *Another issue is the level of detail at which business functions should be mapped to the BRM. For instance, there are several agencies that charge money for the sale of various government products. This would fall under the Revenue Collection category, however this is only an ancillary function of the agency. It is incidental to doing business and it is unclear if this should be included in the agency mapping, or only the primary business area the agency mission falls into. The risk of including all ancillary tasks is that it will give a false impression of duplication and level of activity. More guidance on*

how the BRM is to be applied is essential to a successful implementation.

**Comment 2:** We are not entirely clear regarding the level of detail that should be included in the lines of business and sub functions. Are you looking for the "main" business functions, or should we also include the more rare functions. What if an organization performs an ancillary function to their main function, such as putting someone in jail. They may be forced to jail an individual, but this is not their main function. Should such details be included or not? At present, the level of detail included in this mapping alignment is likely quite uneven, due to various interpretations on this issue.

Response: Agencies should select all Lines of Business and Sub-Functions that describe their operations, regardless of their perceived importance, frequency, resource requirements, location, etc.

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### Process-level analysis in the BRM

**Comment:** Although we believe that Version 2.0 can be used to serve its intended purpose of identifying redundancies and overlapping functions, we suggest that, eventually, the model should use functions and processes rather than LOBs as the basic units of analysis, particularly in the "Services for Citizens" Business Area. Redundancies in this area are not as obvious as those in the "Support Delivery of Services" or "Management of Government Resources" Business Areas. The more detailed level of analysis provided by functions and processes (when compared with lines of business) could make redundancies and overlapping functions easier to recognize and thereby, easier to eliminate, if appropriate.

Response: The FEA-PMO agrees that more information would need to be known about the Sub-Functions in the BRM in order to determine if clear opportunities for collaboration exist. This information includes, but is not limited to -- "functions and processes" -- as the commenter has referred to them. However, the best source of information about lower level processes is the agencies themselves, rather than the FEA-PMO. . The Sub-Function level of the BRM will be used to identify potential areas of opportunity. Agencies will work together within these areas to see if they share common functions, processes, IT capabilities, data requirements, etc. that might be conducive to a collaborative approach.

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### BRM's Applicability to Smaller Agencies

**Comment:** Does the BRM apply to Executive-level agencies only? Does it contain Lines of Business that may only be performed by smaller agencies?

Response: The FEA is intended to, among other things, provide all agencies of the federal government with a greatly increased capability to look outside their organizational architectures to find opportunities for collaboration. The BRM attempts to facilitate this by describing the lines of business the government performs independent of the agencies performing them. It is important, therefore, that the BRM accurately captures all lines of business. The fact that a Line of Business may only be performed by a smaller or "non-cabinet" agency doesn't mean it shouldn't be included in the BRM.

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## STRUCTURE AND NOMENCLATURE

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### Change the name of the Business Areas

**Comment:** We suggest renaming the Support Delivery of Services area and the Management of Government Resources area to Delivery Support Services and Resource Management, respectively.

Response: The FEA-PMO is trying to keep previously released nomenclature wherever possible. While the FEA-PMO finds these suggestions useful, we think the continued use of the terms presented in the model to date are in the best interest of the model's release to the broader agency community. If additional agencies echo this suggestion, we will explore a name change.

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### Levels 1, 2, and 3

**Comment:** The use of the terms Level 1, 2, and 3 to describe the areas of the draft BRM Version 1.0 implies a hierarchy and in reality, the level 3 lines of business are not supporting level 1 activities. Suggestion is to change level to categorization.

Response: The FEAPMO understands the confusion regarding the use of the term levels. We will remove the term "level".

## SERVICES FOR CITIZENS COMMENTS

### GENERAL

#### Government recruitment as a Service for Citizen?

**Comment:** *The e-government initiative "Recruitment One-Stop" is focused on the Federal job applicant and is intended to be a one-stop source to assist citizens in finding employment opportunities with the Federal government. This activity clearly falls under the heading of "Service to Citizens," but does not appear to fit within any of the categories found in that business area. We recommend that this activity be reflected in the "Service to Citizens" business area.*

Response: The commenter is correct in their assertion that the provision of a website to assist the public with finding a government job is, using normal definitions, a service to the citizen. However, "Services for Citizens", as defined in the BRM, describes the purpose of government operations. The government does not exist to hire citizens or to advertise the availability of jobs. As a result, the recruitment function cited by the commenter does not appear in the Services For Citizens layer. It is important to note that citizens expect improved government performance in all areas of operations (or in all areas of the BRM in FEA terms). Recruitment is one of many of these areas. Furthermore, the government has "touchpoints" with the citizens throughout all areas of the BRM; citizen interaction is not limited to the Services For Citizens layer. For example, citizens may want to see government financial statements to monitor government performance and ensure accountability. In this instance, the government is interacting with the citizen and providing a service to the citizen, even though "Financial Management", as defined in the BRM, is not located in the Services For Citizens layer.

#### Demographic-specific benefits

**Comment:** *How do we account for demographic-specific benefits? The BRM does not currently...should it?*

Response: The Lines of Business and sub-functions of the BRM were purposefully defined without regard for the demographic for which the government delivers a service for a citizen. Understanding the intended recipient of a service is clearly important, but often times the processes involved in delivering that service,

as well as the required IT capabilities, are the same regardless of the recipient.

### BUDGET CODE ALIGNMENT

#### What about the budget codes that don't appear in the BRM?

**Comment:** *1. Several "overhead" functions in the functional classification do not map to anything in services for citizens, for good reason. These include functions 900 (net interest), 920 (allowances), and 950 (undistributed offsetting receipts), as well as subfunction 809 (general govt. offsetting receipts).*

Response: The commenter is correct. These codes were not included in the BRM because they do not represent the purpose of government.

**Comment:** *2. Some more substantive subfunctions in the functional classification do not seem to have a landing place in services for citizens, even though they arguably should. These include:*

- a. **251 General science and basic research. This is mostly NSF and DOE research.**
- b. **373 Deposit insurance. This might be in "Financial Sector Oversight", but the definition of that category doesn't seem to allow it.**
- c. **552 Health research and training. This is mostly NIH.**
- d. **602 Federal employee retirement and disability. This might be counted as "overhead" rather than services for citizens; it is part of the cost of providing Federal government services. Perhaps it would fit under "central personnel management" in the general government category.**
- e. **609 Other income support. This includes SSI, TANF, and child care.**

Response:

- a. This Line of Business is now included in the BRM.
- b. This is included in Financial Sector Oversight. The definition has been amended to include this function.
- c. R&D is not called out specifically in the BRM's Services for Citizens layer (which maps loosely to the budget function codes). Instead, it is located in the Mode of Delivery layer. Since agencies are required to identify both a Service for Citizen and a Mode of Delivery, "Health" Research and Training does not need to be called out specifically. Instead, agencies will select the health service that the research program will be promoting (e.g., Illness Prevention), as well as Research and Development. If, however, a research program cannot be mapped to a specific Service for Citizen, the program could be mapped to the "General Science and Innovation" Line of Business.

d. The FEA-PMO does not consider Federal employee retirement and disability a purpose of government (or a Service for Citizen), although it is an important cost of providing Federal government services. We consider this to be a component of the Benefits Management Sub-Function within Human Resources Management. For budgetary purposes, we agree that the appropriate place for this function would be General Government.

e. From an architectural perspective, "Other" categories do not provide a great deal of value. We are trying to define functions in a way that clearly defines the type of operations and programs that belong to them. We've attempted to ensure that these programs would be able to map to other Lines of Business (Education, Health, Income Security).

**Comment: 3. The functions for Social Security and Medicare are presumably folded into the more general categories of general retirement/disability and health care services. This makes good sense. The veterans' benefits and services function does not appear in services for citizens, which is also sensible if the idea is to define the kinds of services government provides, as opposed to the kinds of individuals that receive them. Would these services fall under the general categories for income security, housing assistance, health care services, education, etc.?**

Response: Yes, the BRM attempts to define the functions of government independent of the organization involved or the type of beneficiary (veterans, indians, etc.).

**Comment: 4. The "intelligence operations" service for citizens seems misconceived. Aren't the "services" that citizens get from this channeled through defense and homeland security services? (In fact, couldn't homeland security itself be categorized under law enforcement?)**

Response: The Defense and Intelligence Operations Lines of Business are still being defined and will not be defined prior to release of the BRM Version 2.0. We will consider this comment as these Lines of Business are further defined. The commenter is correct that law enforcement plays a major role in effective homeland security. There are elements of homeland security, however, that go beyond law enforcement (e.g., border control, catastrophic defense protection, etc.), and as such, Homeland Security has been called out as its own Line of Business.

**Comment: 5. Placing the "space operations" service for citizens under transportation seems curious. The definition refers to space operations as a means of transportation for military, commercial, and scientific applications. It seems to us that military and**

**commercial applications are not services to citizens apart from the defense and economic development categories.**

Response: The FEA-PMO received comments on both sides of this issue. We've opted to retain the category for Version 2.0, but we will revisit this issue in the next version of the model.

**Comment: 6. Part of the reason for the absence of subfunctions 251 and 552, and the placement of "space operations," is probably that version 2.0 of the service areas moved R&D/science to a "mode of delivery" rather than a service for citizens. It makes sense that, for example, research into an AIDS vaccine should be part of illness prevention in the health area. However, basic scientific research and space exploration seem to be services to citizens in their own right (admittedly diffuse ones) rather than means of delivering other services. We recommend that basic R&D/science be restored as a service area.**

Response: We have restored Basic R&D/science as a Service for Citizen. It is entitled "General Science and Innovation."

**Comment: 7. The definitions of the subcategories under law enforcement and litigation/judicial activities seem hard to separate. Isn't criminal apprehension part of citizen protection? How operationally would one separate activities of criminal apprehension from criminal surveillance?**

Response: The Law Enforcement categories may seem very similar from a budgetary perspective, but functions like criminal apprehension and criminal surveillance could require very different technology support. We believe that the BRM may need to operate at a lower level of granularity than the budget function codes in these areas. Certainly, we would ensure that the BRM Sub-Functions "roll-up" into the appropriate budget functions.

**Comment: 8. The definition of the "agricultural innovation and service" subcategory should be broadened to explicitly include dissemination of better methods of farming as well as creation of those methods. Most of the money here is probably for agriculture extension offices.**

Response: We will revise the definition to incorporate this into the definition.

**Comment: 9. Some of the language in the definitions is unnecessarily value-laden:  
a. Homeownership promotion assists "financially stable" citizens. Since Federal assistance is designed to help**

*the most marginal borrowers, this seems an odd thing to say.*

*b. Homeownership promotion says that housing for those "unable to provide for themselves" is in the housing assistance category. The implicit distinction between worthy would-be homeowners and shiftless deadbeats is objectionable. If homeownership promotion is for those who are able to provide for themselves, why do they need Federal subsidies?*

*c. Income security says that it provides support to "upstanding members of the U.S. public." What is the point of the word "upstanding"? The largest program in this area is Social Security benefits; its benefits are not limited to the virtuous.*

Response:

a. "financially stable" has been removed from the definition.

b. We will remove the term "unable to provide for themselves" from the definition.

c. We will remove the term "upstanding" from the definition.

**Comment:** *10. The definition for water resource management notes that "hydraulic" power is under the energy area. The usual term (as used in the definition for the energy area) is "hydroelectric."*

Response: We will change the term to "hydroelectric".

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## BRM and the Budget codes

**Comment:** *We are troubled by the change in direction regarding the structure and use of the BRM. Version 1, although needing modifications, was in fact a functionally-driven model of the business operations of the Federal Government. The modifications to Version 2 to more closely align with budget-driven initiatives plus the more active use of the model by OMB to manage agency budgets and performance creates a divide between "appropriated" and "non-appropriated" government service providers. We are, for instance, a very visible provider of government services, but are not subject to the same budgetary constraints or processes as other Federal departments and agencies. On the other hand, we hope to partner with many of these Federal agencies to streamline services for citizens. It would be unfortunate if the BRM became an inhibitor to rather than a facilitator of these and other joint activities. The BRM needs to be structured and used to meet the needs of a variety of organizational business models, not just one rigid financial model.*

Response: We believe that Version 2.0 is vastly improved as a government-wide reference model. Its alignment with other government-wide management initiatives is one of many improvements made to the model.

Since the model will be used by OMB to help inform budget analysis, we wanted to make sure it presented the agency's operations in a way that made sense from a budgetary perspective. The "appropriated" government service providers require a model that describes their operations accurately, or else OMB could make uninformed decisions that could directly affect their appropriations and indirectly affect their service capabilities. Non-appropriated agencies, on the other hand, can still use the FEA to improve service delivery and look for partnership opportunities. The revised model is intended to meet the needs of a variety of organizational business models from a variety of agencies, regardless of the type or amount of their appropriations. We should also note that the BRM is only one of five reference models, each of which will be used to identify the types of collaboration opportunities to which you refer.

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## ECONOMIC DEVELOPMENT

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**Intellectual Property Protection should include "discoveries"**

**Comment:** *We believe the BRM Intellectual Property Protection definition would be more complete if it included protection for discoveries. For example, 35 USC 161 allows a discoverer (or an inventor) of a new variety of plant to obtain a plant patent. Thus, a plant patent applicant may and typically does discover the new variety, but need not invent it. Hence, we offer the following definition modification for the FEA-PMO's consideration: Intellectual Property Protection involves all activities to protect and promote the ownership of ideas and control over the tangible or virtual representation of those ideas, including inventions and discoveries, literary and artistic works, and symbols, names, images, and designs used in commerce.*

Response: The definition for Intellectual Property Protection has been updated to reflect these comments.

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## EDUCATION

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**How does the BRM account for museums?**

**Comment:** *Museums have not been adequately accounted for in the BRM. I believe that the management of works of art as part of our national legacy is an element of the purpose of museums, not simply a mechanism we use to achieve an educational purpose. The 'Services to Citizens' layer does include a component under Education called*

**'Educational and Cultural Institutions,' but mapping museum IT systems to that LOB seems ambiguous. All mission activities of our museum are by virtue of its being an educational and cultural institution, but that does very little to assist in identifying opportunities for us to leverage capabilities of use in similar missions elsewhere in the Government.**

Response: Two new sub-functions have been added to the Education Line of Business: "Cultural and Historical Preservation" -- Cultural and Historical Preservation involves all activities performed by the federal government to collect and preserve information and artifacts important to the culture and history of the United States and its citizenry and the education of US citizens and the world"; and "Cultural and Historical Exhibition" -- Cultural and Historical Exhibition includes all activities undertaken by the US government promote education through the exhibition of cultural and historical information, archives, art, etc.

A Change was made at the Mode of Delivery layer as well. The Public Facilities and Infrastructure Line of Business was renamed and revised as follows: "Public Resources, Facilities, & Infrastructure Management-Public Resources, Facilities & Infrastructure Management involves the management and maintenance of Government-owned/controlled capital goods and resources (natural or otherwise) on behalf of the public, usually with benefits to the community at large as well as to the direct user. Examples of facilities and infrastructure include schools, roads, bridges, dams, harbors, and public buildings. Examples of resources include parks, cultural and historical artifacts and art, endangered species, oil reserves, etc."

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### Education Sub-functions need to be redefined for clarity

**Comment: We recommend that the definitions in the Education area be re-worked. The last sentence of the Education definition, for example, precludes distance learning and inappropriately mixes the definition of the service with where it is delivered. The Elementary, Secondary and Vocational Education definition is also seriously flawed: elementary education may be provided to adults as well as young students; reading, writing, and arithmetic are not the only subjects taught at the elementary level (e.g., science and language); etc. The label Educational and Cultural Institutions inappropriately mixes the activities that are performed with the organizations (i.e., Institutions) that may perform those activities.**

Response: The definition for the Education line of business has been changed to incorporate this comment. It now reads- Education refers to those activities that impart knowledge or understanding of a

particular subject to the public. Education can be delivered at a formal school, college, university, or through distance learning or other training programs. This Line of Business includes all government programs that promote the education of the public, including both earned and unearned benefit programs.

Additionally, Elementary, Secondary, and Vocational Education now reads- Elementary, secondary, and vocational education refers to the provision of education in elementary subjects (reading, writing, arithmetic, science, language, etc.); education provided by a high school or college preparatory school; and vocational and technical education and training.

Finally, the Educational and Cultural Institutions Sub-Function has been replaced with two Sub-Functions: "Cultural and Historical Preservation" and "Cultural and Historical Exhibition".

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## ENVIRONMENT AND NATURAL RESOURCES

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### Environmental Monitoring should include ice sheets ...

**Comment: We recommend adding to the definition of Environmental Monitoring and Forecasting under Environmental Management, the monitoring and forecasting of ice sheets to better illustrate the broad range of environmental areas included beyond just air and liquid water.**

Response: The definition has been updated to account for this recommendation.

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### Environmental Mitigation and Restoration

**Comment: Environmental Management Business Line. Mitigation should also be included here. It is different from protection, prevention, or remediation. Mitigation is often used in resource management activities of the Federal government. In addition, restoration should be considered. Often time standards of resource/asset repair or clean-up call for restoration.**

Response: The FEA-PMO has added restoration language to the Environmental Remediation definition and mitigation language to the Pollution Prevention and Control definition. Environmental Remediation - Environmental Remediation supports the immediate and long-term activities associated with the correcting and offsetting of environmental pollution, deficiencies or imbalances, including restoration activities. Pollution Prevention and Control - Pollution Prevention and

Control includes activities associated with identifying appropriate pollution standards and controlling levels of harmful substances emitted into the soil, water and atmosphere from man-made sources. Environmental mitigation projects are also included in this business line.

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## Marine Conservation and Sustainable Stewardship

**Comment:** *For the Natural Resources Business Line, the discussion is biased towards land resource management. You need to explicitly identify marine resources. Management of the marine environment of the US-EEZ covers an area larger than the continental US land area. Perhaps the Conservation sub-function could be revised to say conservation, marine and land management. There is also no identification of extractive uses of natural resources such as minerals mining, and renewable uses such as grazing and fishing on the common properties controlled by the Federal government. These are distinct from ranching and aquaculture.*

Response: The FEA-PMO will rename the LoB "Conservation, Marine, and Land Management". The FEA-PMO also understands the commenter's point about extractive uses of natural resources on federally controlled/owned lands. The Conservation, Marine, and Land Management Sub-Function definition now reads: "Conservation and Land Management involves the responsibilities of surveying, maintaining, and operating public lands and monuments, as well as activities devoted to ensuring the preservation of land, water, wildlife, and natural resources, both domestically and internationally. It also includes the sustainable stewardship of natural resources on federally owned/controlled lands for commercial use (mineral mining, grazing, forestry, fishing, etc.)"

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## COMMUNITY AND SOCIAL SERVICES

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### Community service in the BRM

**Comment:** *Where do we call out Community Service and the promotion of community service?*

Response: There is currently no Line of Business for the promotion of Community Service specifically, but community service programs should generally be mapped to the Community and Regional Development Sub-Function.

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## INCOME SECURITY

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### Additional Income Security programs

**Comment:** *In the document on Services to Citizens, there are a number of areas -- particularly under low-income assistance (Income Security) -- that seem overlooked, in particular, I'd list: -- refugee assistance (under Income Security) -- trade-impact worker adjustment assistance (also under Income Security, & possibly outside, too) -- other training assistance (job-training, also under Income Security, and possibly outside of this, too) -- low-income education assistance (overlaps with education) -- low-income housing assistance is included -- but housing assistance not related to low income is not listed separately outside of Income Security -- low-income energy assistance -- Not an expert on weatherization assistance, but some of this may be related to low-income, and some not -- not listed. As for Health, traditionally low-income health assistance (with health care/insurance coverage) is listed under Income Security, and other assistance outside that area, I believe.*

Response: There are apparent inconsistencies in the way that low-income benefit functions are handled in the BRM. The reason for the inconsistency is the following – the BRM attempts to define the functions of government independent of the stakeholder (or beneficiary in this case) that is involved in or affected by the function. The separation of services devoted to low-income individuals from those devoted to other types of stakeholders could violate this important principle. The addition of separate functions for veterans, refugees, and other beneficiary groups would also violate this principle. We have still modified the BRM slightly in response to your specific comments. We have separated Housing Assistance and Homeownership Promotion. We renamed Farm Income Stabilization "Industry Sector Income Stabilization" to make sure it wasn't beneficiary-specific and we moved it to the Economic Development Line of Business.

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### Enumeration (SSN) and Earnings Tracking

**Comment:** *Two of SSA's major lines of business are not reflected in the BRM: Enumeration; assigning Social Security Numbers (SSN), and Earnings; keeping track of taxpayers' wages and self-employment income. The purpose of the SSN has always been for SSA's internal use as a key for storing and retrieving earnings and beneficiary data. Many agencies and organizations, however, use it for other purposes, and SSA verifies citizens' SSNs for employers and other agencies. The wide-spread, routine use of the SSN has made SSA's maintenance of this data element a significant service to citizens, government and industry. It should,*

**therefore, be listed as a separate sub-function. It does not fit well, however, under any of the lines of business. OMB may want to consider enumeration as its own LOB.**

**Tracking earnings is another major service SSA provides to citizens. SSA processes W-2s for all workers, whether submitted electronically or via paper. SSA forwards W-2 data to the IRS, retaining some data for internal use. SSA also processes the reconciliation of 941 data from employers, submitted to the IRS, with the W-2/W-3 data submitted to SSA. Our annual Social Security statement, which includes a list of earnings, also allows all workers who pay into Social Security to double check postings.**

Response: The FEAPMO believes that Enumeration and Earnings Tracking are processes contained within the General Retirement and Disability subfunction of the Income Security line of business. As such, they should not be called out as additional lines of business/subfunctions, but should be addressed in the agency's own business architecture. The BRM is intended to capture at a high level the business purpose of government (Services for Citizen), and the way the Federal Government goes about accomplishing that purpose (Mode of Delivery). As a result of the expansive scope of the Federal government and the many tasks it performs in the Services for Citizen business area, a certain level of granularity is sacrificed to ensure a comprehensively exhaustive accounting of all lines of business. Thus, functions which are acknowledged to be of extreme importance in accomplishing a particular business line might not be specifically addressed in the Federal BRM, but should nevertheless be addressed in a particular agency's business architecture. This business architecture should, using the Federal BRM as reference, address that functionality and build out the rest of the architecture from it.

As far as "earnings tracking" is concerned, we have added a Taxation Management Sub-Function to the General Government Line of Business. SSA's role in tracking earnings would be considered a component process of this Sub-Function, but would not be called out as its own Line of Business or Sub-Function. SSA should also map this program to the General Retirement and Disability Sub-Function. We will determine in the future if this process needs to become its own Sub-Function.

The FEA-PMO understands the importance of these business lines to SSA and the government as a whole, and will revisit this issue in the future to see if these lines need to be called out specifically in the BRM.

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## Need-Based Assistance and Survivors' Benefits

**Comment 1: The Income Security LOB is missing two major sub-functions: Need-Based Assistance and Survivors' Benefits.**

**Comment 2: What about indemnification against loss (i.e., survivor's benefits). This is the purpose of some federal insurance programs, but it's not called out in the services for citizens layer. We suggest adding Loss Indemnification to Income Security as a Service to Citizens.**

Response: While many government benefit programs are need-based and therefore directed towards low-income individuals, the types of benefits being provided (e.g., health care services) and the reason for providing them (e.g., to improve the health of the United States) are the same. For this reason, the BRM does not differentiate need-based benefit programs from other types of benefit programs. Several commenters raised the issue of survivors' benefits. While survivors are a type of beneficiary (and therefore arguably not to be included in the BRM), the provision of survivor benefits also represents a purpose of government that is not called out elsewhere in the model -- the compensation of the survivors of individuals currently receiving or eligible to receive benefits from the Federal Government. Because of this reason, Survivors Benefits has been added as a Sub-Function to Income Security. "Survivor Compensation provides compensation to the survivors of individuals currently receiving or eligible to receive benefits from the Federal Government. This includes, but is not limited to, survivors such as spouses or children of veterans or wage earners eligible for social security payments."

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## Earned vs. Unearned Benefits

**Comment: There are benefits programs across government that fall into an earned benefits category such as Social Security and veterans' benefits. While both earned and unearned benefits can from one perspective, be aggregated under the category of services to citizens and several of its elements, there are important distinctions between them that should at least be acknowledged in the FEA BRM. We therefore recommend that earned benefits be distinguished from other social service benefits that are based on need. We specifically recommend adding text to Community and Social Services, Income Security, Education and Health Care Services for Citizens to make this distinction clear. An alternative might be to separate Services for Citizens that are based on earned benefits from those that are based on need.**

Response: The FEA-PMO understands the important distinction between the earned and unearned benefit programs of the federal government. Certainly, the service that Veterans provided for this country places their benefits programs into a category of their own, and because of this, the FEA-PMO has incorporated clear language into the definition of several Lines of Business and Sub-Functions to highlight this important distinction. However, given the "functional" nature of the business reference model, we do not think that earned and unearned benefits should be placed in separate Lines of Business in the model. To do so would prohibit the users of the BRM from identifying some of the cross-agency and cross-program collaboration opportunities that the model attempts to promote. As such, definitions for the following Lines of Business and Sub-Functions have been updated: LOB: Community and Social Services LOB: Income Security LOB: Education LOB: Health SF: Health Care Services LOB: Federal Financial Assistance SF: Direct Transfers to Individuals

## INTERNATIONAL AFFAIRS AND COMMERCE

### International Affairs should include commerce

**Comment:** *The "International Affairs" line of business should be renamed to "International Affairs and Commerce". The narrative should change correspondingly as follows: "International Affairs and Commerce involves the non-military..." This revision will better reflect the scope of this business line, which clearly includes international commerce as described under the Global Trade sub-function.*

Response: The Line of Business has been renamed to "International Affairs and Commerce".

### Global Trade vs. Diplomacy and Foreign Relations

**Comment:** *There is a question of where the negotiation and enforcement of Trade Agreements should be categorized in ... Trade LOB or in the Diplomacy and Foreign Relations LOB.*

Response: These two lines of business have been combined into a newly renamed International Affairs and Commerce line of business. The negotiation and enforcement of trade agreements would be mapped to this line of business and the Global Trade sub-function within it.

## DISASTER MANAGEMENT

### Mitigation in Disaster Management

**Comment:** *Disaster Management Business Line. The role of mitigation appears to be missing from the sub-function definitions. Since mitigation is the primary mechanism to save costs and protect people and property in the public and private sector, these definitions need to include it.*

Response: Disaster Mitigation most accurately maps to the "Disaster Preparedness and Planning" sub-function in the Disaster Management Line of Business. As described mitigation is a form of disaster preparedness and as such it will be added to the "Disaster Preparedness and Planning" definition. "Disaster Preparedness and Planning involves the development of response programs to be used in case of a disaster as well as pre-disaster mitigation efforts to minimize the potential for loss of life and property. This involves the development of emergency management programs and activities as well as staffing and equipping regional response centers, and mitigation-focused construction and preparation."

### Weather monitoring and forecasting

**Comment:** *Should weather monitoring be called out somewhere other than R&D and Disaster Management?*

Response: Yes, weather monitoring and forecasting will now be incorporated into the new Environmental Monitoring and Forecasting sub-function (formerly Environmental Monitoring) in the Environmental Management Line of Business.

## GENERAL SCIENCE AND INNOVATION

### Research Development vs. General Science and Innovation

**Comment:** *Research and Development in Knowledge Creation is repetitive because each subfunction in General Science and Innovation implies that R&D is being done. This is an example of where mapping will become redundant.*

Response: The FEA-PMO understands the comment and is attempting to create a business model with the smallest amount of duplication possible. There are

instances, however, where duplication cannot be avoided. The commenter is correct in their claim that more often than not, any agency that describes their purpose (or Service for Citizen) as "General Science and Innovation" will also be selecting "Research and Development" in the Mode of Delivery layer. There are instances, however, where an agency would promote General Science and Innovation through a financial vehicle, such as a grant to a State or Local Government. A general rule of thumb for this issue is as follows: If an R&D program is directed towards the improvement of a specific Service for Citizen (like "Illness Prevention", for example) the program should be mapped to Illness Prevention in the Services for Citizen layer and Research and Development in the Mode of Delivery layer. If the purpose of the program is not a specific Service for Citizen, but rather general innovation, the program should be mapped to General Science and Innovation in the Services for Citizens layer and the appropriate Sub-Function (usually Research and Development) in the Mode of Delivery layer.

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### Research Development vs. General Science and Innovation (cont)

**Comment: The different approaches to research cause confusion and disagreement. Where is the dividing line between research performed in support of a line of business (i.e., research that is a Mode of Delivery) and research under the "General Science and Innovation" Line of Business? The theoretical difference is understood, but in practice the lines become blurred. There is a likelihood of inconsistency in how this area will be addressed.**

Response: If an agency is performing research to support a specific service for citizen, then they should map to the Service for Citizens that applies. Research programs that cannot be linked to a specific line of business should be mapped to the General Science and Innovation Line of Business in Services for Citizens. There is no clear dividing line that describes when a program should be mapped to one area or another. The budget code mappings, which agencies have been using for years, should help guide the mapping process for agencies. The General Science and Innovation category should align closely with the "General science and basic research" category from the budget function codes. Agencies that have mapped their programs to this code in the past will continue to do so in the BRM.

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### Scientific vs. Technological R&D

**Comment: Is the distinction between scientific and technological innovation both clear and useful? In other data collections, we distinguish between basic research and applied research, for example, but not science and technology. Is it important to have subcategories in this instance? Especially since the "General Science and Innovation" category is defined in terms of diverse scientific goals that do not fit into any other function/subfunction, it would make the most sense to us to leave this as its own business line. Our consensus was that agencies would not be consistent in distinguishing between science and technology and a given agency might not be consistent in making the distinction from year to year. There are enough areas, especially in emerging fields, where the distinction is blurry -- such as nanotechnology. Despite the "technology" in its name, much of it is characterized by molecular biology, atomic physics, materials science, and other fields where it is difficult to say where the science ends and the technology begins.**

**Also, it is not clear why space flight innovation should be separated from other science and/or technology (except for the transportation aspects, which I would consider to be transportation and not innovation). Assuming there would also continue to be a Knowledge Creation Mode of Delivery, our other suggestion is to include a note in the General Science and Innovation to clarify that R&D supporting one of the other Services for Citizens missions should be included in the Knowledge Creation MoD.**

Response: General Science and Innovation has been modified to reflect the comments addressing the science/technology distinction. The separate science and technology categories have been combined into a Science and Technology Research and Innovation sub-function and the Space Flight Innovation sub-function remains unchanged, although it has been renamed Space Exploration and Innovation for clarity. Other R&D activities that address a specific line of business, for example environment or health, should be mapped to those lines of business as well as to the Research and Development mode of delivery.

The Space Flight Innovation (now Space Exploration and Innovation) LOB was retained to address agency comments and to better align with the budget codes. The FEA-PMO will revisit this issue in the future to determine if there is a better way to account for this function.

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### Data and statistics as a Mode of Delivery

**Comment: In the Mode of Delivery business area, under Knowledge Creation the "General Purpose Data and Statistics Development" subgroup is not**

**necessarily a mode of delivery. It can be a primary service for the citizen. For instance, a national data center may have as its main function the acquisition and storage of environmental data for public and private users. It is not just a way of delivering environmental management services, the closest match. The organization and its systems don't do environmental monitoring or forecasting, although others may use its products for that.**

Response: If an agency is generating data and statistics to support a specific service for citizen, then they should map to the service for citizen that applies, as well as to General Purpose Data and Statistics in the MoD layer. If a data and statistics initiative truly supports many Services for Citizens, then agencies should map it to multiple Services for Citizens, in addition to General Purpose Data and Statistics in the MoD layer. For research programs that cannot be linked to a specific line of business, agencies should map to the General Science and Innovation Line of Business in Services for Citizens.

It should be stressed, however, that the fact that an agency doesn't actually perform the specific service for the citizen (in this case Environmental Monitoring and Forecasting), doesn't mean that the agency shouldn't be mapped to it. Generally speaking, if an organization generates data and statistics that others use to improve the performance of a specific service for the citizen, that organization should map to that service for the citizen and General Purpose Data and Statistics.

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### Rename Scientific Innovation

**Comment: In the Services for Citizens Business Area, under General Science and Innovation, we recommend that Scientific Innovation be renamed Scientific Research and Innovation to better characterize the nature of this work, especially the basic long term scientific research work that does not immediately lead to technology product innovation. We agree that the definition does capture this kind of research, but people will generally work with the label, not the definition, and re-naming the label will increase understanding.**

Response: We will rename the Sub-Function. We have also combined scientific and technological research and innovation in the same Sub-Function.

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### Space Flight ...

**Comment: In the Services for Citizens Business Area, under General Science and Innovation, we recommend that Space Flight Innovation be renamed**

**Space Flight Exploration and Innovation. The current label does not at all capture the notion of human and robotic exploration of space. We also suggest re-defining Space Flight Innovation as follows: "Space Flight Exploration and Innovation includes all activities devoted to innovations directed at human and robotic space flight and the development and operation of space launch and transportation systems." This revised definition adds robotic missions that are important components of space flight, clarifies that launch services are included in space transportation systems, and removes the overlap with the Transportation/Space Operations definition resulting from the last sentence of the current definition.**

Response: The LoB has been changed to Space Exploration and Innovation and the definition updated to account for this comment.

## HEALTH

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### Clinical Trials

**Comment: Access to clinical trials may already fit into your provision of health care, but is also related to research, which may be treated outside the "Service to Citizens."**

Response: The FEA-PMO agrees with the commenter. Clinical trial programs would be mapped to the appropriate Sub-Function in the Health Line of Business, as well as to Research and Development as a Mode of Delivery.

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### Food and drug regulation; veterinary regulation

**Comment: We found it difficult to place business functions such as Food Safety Compliance, and regulation of veterinary medical products. In general, the model should be made explicit for the placement of regulation of food and drug products.**

Response: When mapping to the BRM and to the Lines of Business in the Services for Citizens Business Area agencies should also map to a corresponding Line of Business and Sub-Function in the Mode of Delivery Business Area to account for the "Method" in which the agency delivers the service to the citizen. In this case Food Safety is accounted for in the "Consumer Health and Safety" sub-function in the Health Line of Business. The compliance and regulation aspects of Food safety would be captured by one of the sub-functions in the Regulatory Compliance and Enforcement Line of

Business in the Mode of Delivery Business Area. The definition for "Consumer Health and Safety" has been updated to more accurately account for food and drug safety as well as veterinary drug safety.

## WORKFORCE MANAGEMENT

### Workforce Management (SFS) vs. Human Resource Management (MGR)

**Comment:** *In the lines of business Workforce Management and Human Resources there are redundancies in - Training (Training and Employment in Workforce Mgmt is the same as the Resource Training And Development subfunction in HR) - Labor Management (Labor Rights Management is a type of Training and Employment and the subfunction Labor Rights Management is also repetitive with Labor Management in HR).*

Response: While these lines of business do contain similarities, there is a fundamental distinction in that the lines of business within the Services for Citizens business area address government functions that provide a service for the citizen whereas those in the Management of Government Resources business area address functions that agencies perform internally. Thus, Training and Employment entails services provided to a citizen to help improve their job skills and obtain a job, and Resource Training and Development within HR Management addresses the internal development actions of agency employees. Likewise, Labor Rights Management under Workforce Management is intended to address those activities performed to ensure the labor rights of citizens, whereas Labor Management activities in HR address the interactions and functions pertaining the employment of Federal personnel. The commenter should note, however, that the Labor Management Sub-Function was subsumed into the new Personnel Management Sub-Function in the final BRM v2.0.

## LAW ENFORCEMENT

### What about arresting, transporting, and detaining suspects?

**Comment:** *Services to Citizens. We were able to re-map our business functions to the new Services to Citizens business functions relatively easily. Mappings are complete, with just one discrepancy: We have three functions that aren't clearly accounted for in the OMB business functions. These are: Arrest Suspects,*

***Detain Suspects, and Transport Persons in Custody. These can easily be accounted for in the new scheme, if the Law Enforcement definition is modified as follows. Law Enforcement / Criminal Apprehension – Criminal apprehension involves activities associated with the tracking, arrest, detention, and transportation of groups or individuals believed to be responsible for committing Federal crimes.***

Response: The definition for the "Criminal Apprehension" Sub-Function has been updated to reflect these comments.

### Leadership Protection for foreign leaders

**Comment:** *Under Law Enforcement. The protection of foreign leaders, significant foreign dignitaries, and diplomatic missions is not addressed. Leadership Protection should include the protection of foreign leaders and significant foreign dignitaries, and Property Protection should include foreign diplomatic missions.*

Response: The definition of Leadership Protection has been changed to: Leadership Protection involves all activities performed to protect the health and well being of the president, vice-president, their families, foreign leaders and dignitaries, and other high-level government officials; and the definition of Property Protection has been modified as follows- Property Protection entails all activities performed to ensure the security of civilian and government property as well as foreign diplomatic missions.

## HOMELAND SECURITY

### A separate Line of Business for citizenship and naturalization?

**Comment:** *Under the Regulated Activity Approvals LOB, we suggest adding the subfunction "Regulate non-citizen entry, exit, residence, and naturalization". This new BRM subfunction would include business activities now performed by the Immigration Services Division of INS, and which will continue to be performed by the Bureau of Citizenship and Immigration Services in DHS. It could include visa adjudication and issuance by Department of State. We think that this function of managing legal non-citizen entry exit, residence, and naturalization is sufficiently different from other federal government permitting and licensing activities that it merits a separate subfunction in the FBRM.*

Response: Currently the model does not provide a Sub-function for the Naturalization of immigrants. These

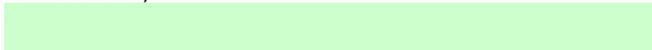
operations should be mapped to the Border Security Sub-Function in the Homeland Security Line of Business, and the Mode of Delivery through which the INS delivers this form of Border Security – in this case, Regulated Activity Management-Permits and Licensing. The FEAPMO will continue to research whether the further level of clarification recommended in this comment will be necessary.

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### **Sustainable Stewardship in Regulated Activity Management**

***Comment: For the Regulated Activity Management Business Line, there should be a sub-function for common property stewardship activities. It would include fishery management and spectrum management regulations, and possibly other areas such as grazing, endangered species management, marine mammal management, resource stewardship, and the use of Federally owned/controlled resources. I suspect one could include the items above under the Civilian Operations line as "not elsewhere classified"; however, I think that might undermine some of the value of the BRM, at least for natural resource stewardship activities.***

Response: The FEA-PMO has added clarifying language to the Conservation, Marine, and Land Management Sub-Function to stress the government's role in sustainable stewardship of natural resources on federally owned or controlled lands. We think that this should address the majority of the commenter's concerns. In the Mode of Delivery layer, the Public Resources, Facility and Infrastructure Management Sub-Function might be selected for these operations. If the government chooses to support the Conservation function using a "regulatory" mode of delivery, they would choose the appropriate method of regulated activity management (e.g., permits and licensing, inspections and auditing, etc.). The addition of a common property stewardship sub-function is therefore unnecessary.



## MODE OF DELIVERY COMMENTS

### GENERAL

#### Is the Mode of Delivery just for Services for Citizens?

**Comment:** In v1, the BRM contained business functions that could be grouped into three business areas. These weren't considered different levels – merely different groupings on the same level. The introduction of the Mode of Delivery in v2, and the concept of levels, confuses the intent of the model. It appears that the BRM is no longer about business functions alone, but also includes modes of delivery for a subset of the business functions – those that are grouped under Services to Citizens. It is not clear from the documentation provided whether or not every business function falling under Services to Citizens should be accounted for in the Mode of Delivery, both in terms of how it reaches the citizens and in the funding/resource allocation method. In addition, it is not clear why the other two business areas, Support Delivery of Services and Management of Government Resources, are subjugated to different BRM levels. Also, it is not clear if these two business areas will have a Mode of Delivery link. Our best understanding of the model is depicted below.

Response: All four of the BRM Business Areas (i.e., Services for Citizens, Mode of Delivery, Support Delivery of Services, and Management of Government Resources) contain distinct functions and can be thought of independently to facilitate analyses. The Mode of Delivery and the Services for Citizens layers, however, can also be thought of collectively – as the modes of delivery describe the various methods the government employs to delivery services for citizens. This is not the case with the other two areas of the model. These two areas of the model are performed directly by government employees and/or contractors. The Mode of Delivery idea is unnecessary in this instance, as the government directly performs these tasks. For example, the government doesn't use a variety of modes of delivery – such as R&D or Grants – to conduct Planning and Resource Allocation activities. The government (or a designated contractor) conducts the task directly. Lastly, The FEAPMO understands the confusion regarding the use of the term levels. We will remove the term.

#### Can Modes of Delivery map to more than one Service for Citizen?

**Comment1:** The relationship between each service to citizens and supporting mode of delivery is not specified beyond the graphic representation for each layer. It appears that a single supporting mode of delivery can map to more than one service for citizens. For example, Public Goods Creation and Management, Knowledge Creation, and Regulated Activity Management are all lower level processes that could be performed in support of any of the Services for Citizens functions. If this is so, then they should also be in the Support Delivery business area.

Response: The commenter seems to think that a mode of delivery can't support more than one Service for Citizen. This is not correct. The modes of delivery can and are meant to support a variety of services for citizens. The reverse is true as well -- a given service for citizen could be implemented through a variety of modes of delivery. This is the reason that the two layers have been separated in BRM Version 2.0.

#### Why isn't Mode of Delivery just an attribute of the Services for Citizens

**Comment:** In modeling business functions, it is important to keep the level of activities the same across the topic of discussion to prevent overlapping of activities at the lower levels of the model. The "Mode of Delivery is an attribute of the Services for Citizens functions. At best, many of these are more likely to be Support Delivery functions and may be performed in support of any of the "Services for Citizens". Rather than create a separate business area, expanding the definition of the Support Delivery of Services to include "activities performed to carry out Services for Citizens" might be less problematic going forward.

Response: The FEA-PMO separated out the Mode of Delivery layer for precisely the reasons cited by the commenter (consistent granularity across the model, minimization of functional overlap, etc.). The commenter is also correct in stating that the Mode of Delivery can be thought of as an attribute of the Services for Citizens. However, these "attributes", in the mind of the FEA-PMO, are best thought of as functions in and of themselves. If the modes of delivery were not called out specifically but assumed to be attributes of the Services for Citizens, the BRM would lose its ability to identify collaboration opportunities around specific modes of delivery. To clarify, by calling the modes of delivery out separately, the BRM can identify collaboration opportunities for organizations providing entirely different services for the citizen.

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### The Mode of Delivery area is unnecessary and redundant with the SRM ...

**Comment:** A second issue with the Mode of Delivery is the name and definition. The BRM should describe what the agency does; it is up to other areas of the overall architecture to describe how these activities are performed. The concept of the Mode of Delivery seems to be redundant or conflicting with the Service Component Reference Model, which defines the tasks (the "how") of the mission and goals of the business line and how they are implemented. In many instances, particularly in the Financial Vehicles section, these should be sub-categories of some of the Services for Citizens business lines instead of stand-alone components themselves, or as in the case of some of the Government Service Delivery components, should be in the Support Delivery of Services area, as they are extremely cross-cutting. By segmenting these components as they are, it will help to build in and maintain duplicative processes, not reduce or eliminate them.

Response: The modes of delivery were separated in the model to minimize the redundancy in the model and to better highlight opportunities for collaboration within modes of delivery, regardless of the specific service for citizen being provided. When mapping to the BRM and to the Lines of Business in the Services for Citizens Business Area agencies should also map to a corresponding Line of Business and Sub-Function in the Mode of Delivery Business Area to account for the "Method" in which the agency delivers the service to the citizen. These "Methods" are still functions in and of themselves, but they are not the final purpose of the Federal Agency. As an example an agency might provide Grants to a specific community for some given purpose, say housing. The overall purpose or Service for the Citizen is not the giving of grants; it is the promotion of community development through the use of grants. Since each of the Modes of Delivery can support each if not all of the Services for Citizens, the Modes of Delivery have been defined in a separate Business area to reduce redundancy in the model.

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### Technology as a Mode of Delivery

**Comment:** For my organization, Technology Management is both a service delivery function and a back office support activity.

Response: Technology can be used to automate aspects of all of the lines of business in the BRM. The

fact that technology is being used to automate a mode of delivery does not mean that technology should be called out as mode of delivery in and of itself. For example, if you're conducting loan transactions online, the mode of delivery is still direct loans.

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### Mode of Delivery Terminology

**Comment:** Are the categories in Mode of Delivery considered lines of business or is there new terminology for that?

Response: The categories in the Mode of Delivery area are considered Modes of Delivery and MoD Sub-Functions. Since they address the way in which the government provides service as opposed to the services that it provides, the FEAPMO felt that it was not appropriate to use the term lines of business.

## KNOWLEDGE CREATION AND MANAGEMENT

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### Knowledge "Creation" should be replaced with Knowledge "Management"

**The term "Creation" in draft BRM Version 2.0 is not necessary when it is understood that the full life cycle of operations will be addressed (creation through disposal). In this case, it is better to use the term "management" - the fact that it is "created" is a given.**

"Knowledge Creation" has a very different connotation than "Knowledge Management". The government promotes the improved performance of many services for citizens by creating new knowledge through R&D or widely used data and statistics. Knowledge Management, on the other hand, seems to imply management of information that has already been created, which is not the sole intent of this mode of delivery. The same holds true for Public Asset Creation, a similar mode of delivery. For the sake of consistency, the FEA-PMO would like to keep the term "creation" in both. Regardless, we will rename the Knowledge Creation Line of Business "Knowledge Creation and Management."

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### Socio-Economic Research & Development

**Comment:** The Socio-Economic Research & Development sub-function in Research and

**Development does not contain any different functions from the other two sub-functions.**

Response: We have removed the Socio-Economic Research & Development Sub-Function.

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## Map Creation?

**Comment: What about the creation of maps?**

Response: There is currently no specific Line of Business or Sub-Function for the creation of maps. Map creation should generally be mapped to the Service for Citizen the map supports (e.g., Conservation, Marine, and Land Management; Transportation; etc.) and to General Purpose Data and Statistics in the Mode of Delivery layer.

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## The Internet as a Mode of Delivery ...

**Comment: The "Official Information Dissemination" Sub-Function (in the Public Affairs line of business, Support Delivery of Services business area) is generally where agency Web sites are mapped. This LOB suggests, however, a Web site that broadcasts/distributes information assembled for other purposes. While information dissemination about the Museum and its activities are part of the Web site, our real goal is to build a Web site that functions as a correlate to the Museum itself. Most of our Web visitors will never visit the Museum building. For them, the Web site is the museum. So, to the extent possible, the Web site functions as both a broad and focused educational tool, expressing the core Museum messages through a variety of strategies. Most of the site contents are created specifically for the Web and for the active use of teachers, students, and citizens who want to engage these ideas.**

Response: The FEAPMO believes that the dissemination of information as a mode of delivery has not been addressed and as such has expanded the Knowledge Creation mode of delivery to be renamed as Knowledge Creation and Management and added a Knowledge Dissemination subfunction to it. This Knowledge Dissemination subfunction is intended to address those instances where the end method used in delivering a service is through the publishing or broadcasting of information, such as the Voice of America or web-based museums maintained by the Smithsonian. It is not intended to address circumstances where the publication of information is a by-product of the actual mode of delivery. For example, an agency might perform research (the mode of delivery) addressing a particular business issue

(for example the environment) and as a result publish a report on the findings. In this instance, research would be the mode of delivery and publishing the report would be a Support Delivery of Service.

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## PUBLIC GOODS CREATION AND MANAGEMENT

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### Include Resources with Public Facilities and Infrastructure Management

**Comment: When defining the Public Goods Creation and Management sub-function include resources in the management section -- Public Resources, Facilities & Infrastructure Management.**

Response: We have amended the definition accordingly -- "Public Resources, Facilities, & Infrastructure Management- Public Resources, Facilities & Infrastructure Management involves the management and maintenance of Government-owned capital goods and resources (natural or otherwise) on behalf of the public, usually with benefits to the community at large as well as to the direct user. Examples of facilities and infrastructure include schools, roads, bridges, dams, harbors, and public buildings. Examples of resources include parks, cultural artifacts and art, endangered species, oil reserves, etc."

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### Manufacturing

**Comment: Currently there is no Line of Business (LOB) in the Federal BRM for the Manufacturing function. This function would include the coins/currency that Treasury's Bureau of Engraving and Printing/MINT produce. Other Federal agencies manufacturing vaccines, weapons, etc. could also use this LOB. This LOB should be categorized under the Service to Citizens area.**

Response: The FEAPMO has created an additional layer to the BRM known as the Mode of Delivery. This layer is used to describe the manner in which the Federal Government accomplishes its business purposes, which are outlined in the Services for Citizens layer. One of the Modes of Delivery is Public Goods Creation and Management, which has the subfunction Manufacturing. Thus, in the case of producing the coins and currency, Treasury would map to the Economic Development line of business (the purpose), and to the (Public Goods Creation and Management, Manufacturing mode of delivery, the manner in which that purpose is accomplished.

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## Health Data Architecture and Information Infrastructure Management

**Comment:** *I might also want to be sure that "health data architecture" is included -- either in "Services to Citizens" in an expanding "Public Health Monitoring and Data Architecture" l.o.b., or somewhere else.*

Response: The FEA-PMO agrees with the commenter on the need to call out the government's role in taking stewardship for a type of information on behalf of the citizen to improve government service. The FEA-PMO believes this role of government should be called out in the Mode of Delivery layer of the BRM as it could be leveraged to improve performance for a variety of Services for Citizens. The commenter notes an example relating to the Health Line of Business. Another example that comes to mind is in Law Enforcement, where a federal program could create a single data architecture for criminal tracking information. The collection and standardization of all geo-spatial information stands as yet another example.

To address this need, we are adding an "Information Infrastructure Management" Sub-Function to the "Public Goods Creation and Management" Line of Business in the Mode of Delivery layer. This will complement the "Public Resources, Facility & Infrastructure Mgmt" Sub-Function. In the same way that government manages the public transportation infrastructure to ensure safe transportation, the government could manage the health information infrastructure to improve the quality of health care.

## REGULATORY COMPLIANCE AND ENFORCEMENT

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### Permits and Licensing as a Mode of Delivery

**Comment:** *Should there be a facility licensing sub-function under Public Health management? Should licensing be a support delivery of services? If you think about it, facility license and permitting is a support function to the promotion of certain Services to Citizens like Public Health, Worker Safety, Environmental Management, etc.*

Response: With the multi-level approach used in BRM v2.0, this issue has been addressed. Permits and Licensing is found in the new Mode of Delivery layer, highlighting that is a mechanism the government employs to achieve a variety of services for the citizen. In the commenter's example, health facility licensing and permitting would be linked to the appropriate "Health" function in the Services for Citizens layer, as well as the "Regulated Activity Approvals" Line of Business in the Mode of Delivery layer.

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### Licenses vs. Permits

**Comment:** *The difference between Licenses and Permitting is not well-established. These sub-functions need to be clarified/redefined.*

Response: The line of business Regulated Activity Approvals has been changed to Regulatory Compliance and Enforcement, with the following sub-functions: Inspections and Auditing, Standard Setting/Reporting Guideline Development, Permits and Licensing. The FEA-PMO combined the formerly separate Sub-Functions for permits and licenses found in Version 1.0 of the model.

## DIRECT SERVICES FOR CITIZENS

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### Why is the Direct Services for Citizens category necessary?

**Comment:** *The "Direct Services for Citizens" category appears to be unnecessary when you consider that all "Services for Citizens" functions are provided by either civilian or military operations and sometimes, a combination of the two. An additional category for these operations is redundant because it links back to everything in the model. And if that's true, then these are attributes of every function, rather than a function themselves.*

Response: The Direct Services for Citizens category is necessary to highlight those situations where the government employee is directly performing the operation designated in the Services for Citizen layer. For Example: The EPA may support Environmental Remediation by sending an EPA employee to a site to conduct cleanup activities (Direct Service for Citizen-Civilian Operations) or they may provide funds to a state or county (Federal Financial Assistance) to perform the cleanup. Although EPA employees would be involved in dispersing the funds to the state or county, those employees are not *directly* involved in the cleanup of the polluted site. This is the distinction provided by the "Direct Services for Citizen" Line of Business.

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### Peer-to-Peer Communication and Information Exchange

**Comment:** *We provide criminal justice information to other law enforcement organizations such as other*

**Feds, State, and Local. Would this be considered a sub-function under Civilian Operations, or is there a need to add another mode of delivery that considers peer-to-peer relationships on the part of the citizen.**

Response: As far as "peer-to-peer" relationships are concerned, the BRM does not have a line of business designated for such an activity. Due to its functional nature, the BRM identifies many lines of business where multiple agencies play a role. It follows that these agencies should be communicating and sharing technology, data, etc. where appropriate. The BRM does not have a separate Line of Business for collaboration. Oftentimes, however, this collaboration will become apparent through shared or cross-agency IT investments.

The FEA-PMO does agree with the commenter on the need to call out the government's role in taking stewardship for a type of information on behalf of the citizen to improve government service. The FEA-PMO believes this role of government should be called out in the Mode of Delivery layer of the BRM as it could be leveraged to improve performance for a variety of Services for Citizens. To solve this problem, we are adding an "Information Infrastructure Management" Sub-Function to the "Public Goods Creation and Management" Line of Business in the Mode of Delivery layer. This will complement the "Public Facility & Infrastructure Mgmt" Sub-Function. In the same way that the government manages the public transportation infrastructure to ensure safe transportation, the government will manage elements of the law enforcement information infrastructure to improve law enforcement.

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### Civilian Operations in the Mode of Delivery layer

**Comment: The following should be added: Mode of Delivery Business Area; Government Service Delivery; Direct Services to Citizens Line of Business; Postal Operations and Retail Sub-Function (New) – Postal Operations and Retail involves the activities required to support the uniform and universal collection, sortation, transportation, and delivery of mail, messages, and parcels to all residents and businesses of the United States and between residents and businesses in other countries throughout the world. It also includes the nation-wide retail infrastructure required to make Postal Services easily accessible to customers.**

Response: The "Civilian Operations" Sub-Function in the Mode of Delivery layer is extremely flexible. If it is coupled with the "Postal Services" Sub-Function from the Services for Citizens area, the "Postal Operations and Retail" function would be understood. If "Postal Operations and Retail" were called out in the Mode of Delivery layer specifically, the layer would need to call out countless other services to citizens that are *directly*

delivered by the government. We will revise the current definition of Postal Services to incorporate language from the definition you have provided.

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## FEDERAL FINANCIAL ASSISTANCE

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### "Substantial Federal Participation" in the Federal Grants definition

**Comment: Mode of Delivery, Federal Grants (Non-State). Suggest the following edits to the current definition: "Federal Grants involve the disbursement of funds by the Federal Government to a non-Federal entity to help fund projects or activities (strikethrough: that do not involve substantial federal participation)." Justification: First, the amount of federal participation may vary depending on the grant. Second, the term "substantial" is subjective. Some grantees may deem ordinary activities like Federal data collection and monitoring-related site visits as "substantial participation." Third, the document does not provide the same qualifier for State grants and other types of financial transfers. This could be construed to mean state grants (and other transfers) are inherently different and thus could have substantial Federal participation. Or would inherently have more federal participation than non-state grants. Both conclusions of which, are of course, untrue.**

Response: The FEA-PMO agrees with the commenter on all points. We have revised the "Federal Grants (Non-State)" definition as follows -- "Federal Grants (Non-State) - Federal Grants involves the disbursement of funds by the Federal Government to a non-Federal entity to help fund projects or activities. This includes the processes associated with grant administration, including the determination of grantee eligibility, the transfer of funds, and the oversight as appropriate.

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### Financial Modes of Delivery

**Comment: Why are Federal Financial Assistance, Credit and Insurance, and Financial Transfers to States different lines of business? Functionally, they are very similar. They both have the end goal of G2C. The suggestion here is to make one line of business with these subfunctions: Federal/Formula Grants, Direct Transfers, Subsidiaries, Direct/State Loans, and Tax Credit.**

Response: The Financial Vehicles modes of delivery have distinct reasons for being kept separate. The FEAPMO believes that financial interactions with states can be different than those with individuals and has

thus called out the Financial Transfers to States mode of delivery. Furthermore, the FEA-PMO is attempting to improve the presentation of States involvement in the revised BRM. The Financial Transfers to States Line of Business begins to accomplish this.

In reference to Federal Financial Assistance and Credit and Insurance, the primary difference between those two is the obligation of repayment. Federal Financial Assistance modes of delivery such as grants and subsidies do not require repayment whereas direct loans or loan guarantees comprise financial vehicles that do require repayment. The FEAPMO believes the monitoring and tracking functions entailed in these delivery methods are distinct enough to require them to be called out separately.

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### **Incorporation of State Programs**

***Comment: As stated in our SRM/TRM comments, we believe that the FEA initiative has the potential for business process improvement. To that end, we believe the BRM should include more State programs. For example, programs such as Medicaid, Food Stamps, and Temporary Assistance for Needy Families (TANF) are very closely associated with federal income security programs such as our SSI program and VA's Compensation and Pension programs. The State's driver licensing operation is critical both to homeland security and to the integrity of SSA's enumeration process.***

Response: The BRM attempts to capture programs related to the states through the mode of delivery area. The Financial Transfers to States and Local Governments mode of delivery provides this linkage for state programs that are closely associated with federal programs. To clarify, the fact that a program is implemented by the states (e.g., Food Stamps, TANF, etc) doesn't mean it's not accounted for in the BRM. The Food Stamp program, for example, would be mapped to Food and Nutrition Assistance in the Services for Citizens layer and to Financial Transfers to States in the Mode of Delivery layer. It must also be noted however, that since the BRM is a Federal business model, the model will not address any program solely under the purview of a state.

## SUPPORT DELIVERY OF SERVICES COMMENTS

### “GENERAL GOVERNMENT” AND CROSS- AGENCY GOVERNMENT SERVICES

#### General Government vs. “Cross-Agency”

**Comment: Revenue Collection as a line of business should disappear. Inter-Financial Management (Government-Wide Financial Management) should also disappear. Government-Wide Financial Management is the same thing as General Government. Revenue Collection should become a subfunction under General Government to replace Tax Collection. This would eliminate a great deal of redundancies because if you map to Revenue Collection, you will automatically have to map to Government-wide Financial Management and maybe General Government (Tax Collection).**

Response: The FEA-PMO has decided to include Tax Collection as a specific Sub-Function under General Government while leaving other revenue collection functions in Support Delivery of Services. While this may seem inconsistent, it is appropriate considering the overall construct of the BRM. The General Government category is reserved for the central management operations of the government performed by certain organizations on behalf of other agencies. Tax Collection is one of these services. Many agencies collect revenues, but their actions would not be described as central management operations of the government as a whole. The FEA-PMO has also decided to retain the distinction between “Inter-agency” and “Intra-agency” operations, although the terms have been changed to “Agency-Specific” and “Cross-Agency”, and their scope has been broadened to include both the Management of Government Resources and Support Delivery of Services LOBs. The FEA-PMO recognizes that the addition of the new “General Government” LOB may make this distinction unnecessary in some instances, but we feel the additional level of granularity the distinction provides in other instances outweighs the potential redundancy. Furthermore, this distinction is of extreme importance when describing E-Gov and other cross-agency IT initiatives. For example, a cross-agency travel solution would be mapped to “Travel (cross-agency).” Without this distinction, this initiative would appear no different than an agency-specific travel system.

#### Services For Government ... Census

**Comment: The Census Bureau has no representation in Services for Citizen. Is it acceptable to have an organization at the Mode of Delivery level? In relation to this topic, GSA, IRS, OPM, EOP, parts of DOJ support the Services for Citizens. It seems counter productive to pull these organizations into the General Government area of Management of Government Resources. Doing so will mask the cross cutting support provided by these agencies, as well as leading to duplication across the government EA model. In all, the General Government area is superfluous.**

Response: It is possible to have an organization that does not provide a Service for the Citizen, but rather a service for government. In order to show the importance of these organizations, and to better align the BRM with the budget codes, the General Government category was added and now resides in the Support Delivery of Services layer. This category is different from other Support and Management functions in that it represents the purpose of the organizations that are mapped to it. Agencies that map to this Line of Business still have the ability to map to any of the other Modes of Delivery, Support Delivery of Services, or Management of Government Resources LoBs and SFs that apply. They can also select “Cross-Agency” for these areas, as they are providing these services for other agencies. This gives these organization the opportunity, as the commenter suggests, to highlight the cross cutting support they provide.

In order to account for government-wide statistics and data management such as that performed by the Bureau of the Census, the FEAPMO has taken the Central Property and Records Management subfunction within the General Government line of business and subdivided it into Central Property Management and Central Record and Statistics Management. The Central Records and Statistics Management subfunction is defined as: *Central Records and Statistics Management* involves the operations surrounding the management of official documents, statistics, and records for the entire Federal Government. This subfunction is intended to include the management of records and statistics for the Federal government as a whole, such as the records management performed by NARA or the statistics and data collection performed by the Bureau of the Census. Note: Many agencies perform data and statistics management for a particular business function and as such should be mapped to that line of business. The Central Records and Statistics Management is intended for functions performed on behalf of the entire Federal government.

#### Management of the Money Supply

**Comment: I think adding the mode of delivery helped, although I had problems figuring where some of our**

**functions would fit - for example, management of the money supply. I finally decided it would be under General Government, Central Fiscal Operations.**

Response: That is correct.

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### Child Care Services...

**Comment: The current model supports the perspective of government to citizen's services and does not totally reflect government-to-government services under the LOB Management of Government Resources. As a result, we feel that the BRM v2.0 has diminished our ability to identify and leverage cross agency initiatives. An example of this is childcare services. Childcare services do not appear to be represented and easily mapped to the BRM v2.0. We think it would go under Services for Citizens business area since this describes a service ("what") to a citizen, primarily a government employee (provided citizen includes a government employee). We feel that it is important to distinguish the types of government-to-government services that are provided so that we can easily and readily collaborate with those agencies that perform similar functions.**

Response: Services provided to government employees are not considered services for citizens. The Services for Citizens layer is reserved for the purpose of government. The government does not exist to provide services for its own employees. That being said, services for government employees are still extremely important, and they must be accounted for effectively in the BRM. A variety of changes have been made to better account for "services for government" organizations. Please see the BRM Version 2.0 release document for more on this issue. As far as childcare services are concerned, the FEA-PMO believes this is a component of the Benefits Management Sub-Function in the Human Resource Management Line of Business. The model does not describe all of the benefits that are bestowed upon Government employees; in this instance Childcare services would be considered one of these benefits. If an organization were providing childcare services for other agencies, they would map themselves to "cross-agency" Benefits Management.

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### Cross-Agency Acquisition support

**Comment: Under "public goods creation & management" we suggest another sub function: "provide best value acquisition channels between public and private sectors" to account for cross agency acquisition and procurement.**

Response: The FEAPMO agrees that central acquisition services should be called out and has added a subfunction to the General Government line of business as follows- Central Acquisition Management- Central Acquisition Management includes all central management services provided to create and manage acquisition channels between private industry and the Federal government as a whole.

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### Government Building Management

**Comment: Suggest that the Support Delivery of Services definitions of FUNCTION: Revenue Collection, SUB-FUNCTION: Federal Asset Sales and FUNCTION: General Government, SUB-FUNCTION: General Property and Records Management be revised to provide clarity on what distinguishes them from each other. Federal Asset Sales appears to represent the Property Disposal and Sales, however, it was noted in the Draft BRM v2.0 Agency Briefing and Comparison document that this sub-function was the consolidation of all the sub-functions of BRM v1.0 LOB "Marketable Asset Management" which includes Personal and Real Property Management. The definition, however, does not quite account for that and overlaps with what is noted under General Property and Records Management sub-function.**

Response: The General Property and Records Management Sub-Function has been divided into two subfunctions, one of which is General Property Management. This subfunction includes the central management and maintenance of Federal buildings (as opposed to agency-specific building/space management). The Federal Asset Sales subfunction is meant to include any function that involves the sale of property (both real and personal), possessed by the Federal government. The differentiation between the categories therefore surrounds what the organization does with the property (manage or sell).

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### Tax collection processes

**Comment: Where do the activities of appeals, compliance, refund amounts, granting extensions, and audits of tax collection go (IRS)?**

Response: The FEA-PMO has decided to make Tax Collection its own Sub-Function in the General Government Line of Business. The processes cited by the commenter (granting extensions, managing the appeals process, etc.) are component processes of the Tax Collection Sub-Function. The BRM does not include this level of granularity at this time. Many commenters have noted that in order for the BRM to be useful, it has to go to the process level. While we feel the BRM is still useful at its current level of

granularity, we acknowledge the need for process-level analysis in truly identifying cross-agency collaboration opportunities. For the time being, process analysis will be conducted on a LOB-by-LOB basis in focused areas. It is also important to note that the Service Component Reference Model (SRM) will describe the application capabilities that are needed to automate processes. Coupled with the BRM, it can be used to describe the type of process automation a given Sub-Function requires.

## PLANNING AND RESOURCE ALLOCATION

### Annual and Long-term Strategic Planning

**Comment: Support Delivery of Services, Planning and Resource Allocation. Suggest the following edits to the "Strategic Planning" bullet. "Strategic Planning entails the determination of annual and long-term goals and the identification of the best approach for achieving those goals." Justification: To be consistent with the Program Assessment Rating Tool's (PART's) emphasis that agencies develop a strategic planning framework where a limited number of annual goals demonstrate progress toward achieving long-term goals.**

Response: We will make the changes to the definition.

### Program Evaluation and Performance Monitoring

**Comment: Support Delivery of Services, Planning and Resource Allocation. None of the bullets in this section address program evaluation or the development of budget priorities. The current bullets for budget formulation and budget execution do not capture this critical piece of the budget process. As part of the budget and performance integration initiative, it is my understanding that we are encouraging agencies to build into their day-to-day business a systematic process for defining program goals, developing information collection strategies to inform on those goals, and then using performance information to assess the effectiveness of the program and develop budget priorities. If this activity is not clearly defined as an expected process in the BRM, we are concerned about sending agencies the wrong message about the key day-to-day business activities associated with budget and planning.**

Response: We have revised the Budget Formulation definition to highlight the importance of program evaluation and performance monitoring to this function. The definition now reads: "Budget Formulation - Budget Formulation involves all activities undertaken to determine priorities for future spending and to develop an itemized forecast of future funding and

expenditures during a targeted period of time. This includes the collection and use of performance information to assess the effectiveness of programs and develop budget priorities."

### Management Improvement

**Comment: Management of Government Resources. None of the areas or bullets capture the effort to gauge the ongoing efficiency of business processes and identify opportunities for reengineering or restructuring. In other words, management improvement. In light of the PMA, shouldn't we be seeking to encourage agencies to build a systematic process into their day-to-day management activities that is focused on management improvement? For example, the cost management bullet touches on the assessment of activity costs but ties that information to accurate reporting on financial statements. I cannot find a business process listed in the BRM that ties activity cost information to a management activity that would use those costs to identify inefficiencies or opportunities for improved processes.**

Response: The FEA-PMO understands the commenter's concern that the BRM does not adequately represent management improvement activities. We will add a management improvement Sub-Function to the Planning and Resource Allocation Line of Business: "Management Improvement includes all efforts to gauge the ongoing efficiency of business processes and identify opportunities for reengineering or restructuring."

### BRM alignment to PMA

**Comment: Modify the sub-functions under "Planning and Resource Allocation" to align with the PMA. Specifically, remove "Project Planning" and subsume "Budget Formulation" under "Budget Execution".**

Response: The Project Planning sub-function has been removed, as it seems to be at a lower level of granularity than the other sub-functions. However, due to the unique functions and the difference in timing of the two, Budget Formulation and Budget Execution will remain distinct subfunctions.

## CONTROLS AND OVERSIGHT

### Program Integrity

**Comment:** *Our Program Integrity subfunction does not map to any BRM Mode of Delivery. Several of our programs use the term Program Integrity to describe management controls and fraud detection. They appear to fall into the Mode of Delivery category of the FEA BRM but it does not address these modes. Therefore, we recommends that a Mode of Delivery be added to accommodate this sub function and the general area of management controls and fraud detection.*

Response: The Program Integrity subfunction cited by the commenter is accounted for in the "Controls and Oversight" Line of Business in the Support Delivery of Services business area. The Controls and Oversight definition reads "Controls and Oversight ensures that the operations and programs of the Federal Government and its external business partners comply with applicable laws and regulations and prevent waste, fraud, and abuse". The commenter should map to those sub-functions in this Line of Business that accurately detail their Program Integrity subfunction.

## LEGISLATIVE RELATIONS

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### Congressional Liaison Operations

**Comment:** *Under Legislative Management. Recommend adding an additional function of Congressional Liaison. We spend a tremendous amount of time answering Congressional inquiries.*

Response: A Sub-Function for "Congressional Liaison Operations" has been added to the Legislative Management Line of Business.

## PUBLIC AFFAIRS

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### Product Outreach vs. Product Marketing

**Comment:** *Public Affairs Business Line. Rather than Product Marketing, consider Product Outreach, or Information Outreach, or Product Outreach and Education.*

Response: Product Marketing has been renamed Product Outreach.

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### "External Stakeholders" for Official Information Dissemination

**Comment:** *In the Official Information Dissemination sub-function, what do you mean by "external stakeholder." Is it external to the Federal Government, external to the Executive Branch, external to ones agency?*

Response: In the Official Information Dissemination definition "external stakeholder" refers to entities external to the Federal government.

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### Public Relations vs. Customer Relations

**Comment 1:** *The Public Relations and Customer Relations subfunctions are basically the same functionality, at least by definition.*

**Comment 2:** *Need a sub-function for CRM*

Response: The Customer Relations Sub-Function has been renamed Customer Services and redefined to more accurately account for customer relationship management and to differentiate it from the Public Relations sub-function. See the BRM Version 2.0 Release document or feapmo.gov definitions.

## REVENUE COLLECTION

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### Marketable Asset Management sub-functions should be combined

**Comment:** *The sub-functions under Marketable Asset Management in Version 1.0 all seem to have the same processes under them. The suggestion here is to take a more functional approach.*

Response: Marketable Asset Management and its Sub-functions have now been moved and grouped under the "Federal Asset Sales" sub-function in the Revenue Collection Line of Business.

## MANAGEMENT OF GOVERNMENT RESOURCES COMMENTS

### INFORMATION AND TECHNOLOGY MANAGEMENT

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#### Consolidate all the technology Sub-Functions into a single Internal Function

**Comment:** *The Information Technology (IT) Management function needs to consolidate all the IT in the organization in one LOB. For example, the maintenance of IT systems should be in IT Management as opposed to Administration.*

Response: All of the Information Management functions will be consolidated into a new Line of Business (Information and Technology Management) that will be located in the Management of Government Resources Business Area.

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#### Remove Information Lifecycle Management (formerly Business Management of Information)

**Comment:** *The suggestion is to remove Information Lifecycle Management as a line of business altogether for the following reasons -Any infrastructure that supports info sharing would be within a different line of business anyway. -Records Retention is the same as the Records Management Subfunction within General Government.*

Response: Information Lifecycle Management has been removed from the BRM. A new sub-function "Information Management" will replace the functionality of this Line of Business and is a part of the "Information and Technology Management" Line of Business.

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#### Public Records/Data Management in Version 1.0

**Comment:** *The Public Records/Data Management sub-function in the Federal BRM should be a part of the Business Management of Information as its own sub-function*

Response: The FEAPMO realizes that this was an issue of confusion and has made the following changes. The Information Life Cycle Management (formerly Business Management of Information) line of business and its accompanying subfunctions have been removed from the Support Delivery of Services business area and two new subfunctions have been added to the newly

renamed Information and Technology Management (formerly Technology Management) line of business: *Records Retention-* Records Retention involves the operations surrounding the management of the official documents and records for an agency, and *Information Management-* Information Management involves the coordination of information collection, storage, dissemination, and destruction, as well as managing the policies, guidelines, and standards regarding information management.

In order to account for government-wide records and statistics management such as that performed by the National Archives and the Bureau of the Census, the FEAPMO has created a Central Records Management Sub-Function within the General Government line of business.

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#### Revisions to the Technology Management Line of Business

**Comment:** *Information Technology- In developing our Enterprise Architecture v1.0 (and evolving it into future versions, we have taken a functional approach to describing and decomposing it's major business and enabling functions. In most cases the FEA BRM has taken a similar functional approach as well. One notable exception however in the FEA BRM is the Information Technology area, which has been decomposed not along functional lines but rather along a process oriented dimension aligned with the system development life cycle process. As a consequence, the mapping between our functionally oriented decomposition of our IT enabling function and the FEA BRM's process oriented decomposition is a many to many mapping. Elsewhere, the BRM consistently uses functional decomposition in other support and management functions. We recommend that the BRM Technology Management be decomposed functionally to be consistent with other BRM decompositions and enable a more direct mapping of our subfunctions.*

Response: The Technology Management line of business is currently decomposed along functional lines covering all aspects of IT related services, including, the development of systems, the maintenance of those systems, the maintenance of the infrastructure on which those systems are housed, and the implementation and retirement of those systems. Additions to the Line of Business in Version 2.0 will most likely remove the commenter's concern that this LOB was defined with lifecycle process steps.

It should also be noted that the Service Component Reference Model, once released, will provide a "functional" decomposition of the technology services offered by the applications present in an organization.

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### Can you add a Knowledge Management Line of Business

**Comment:** *While the Mode of Delivery area of the model appropriately calls out Knowledge Creation, we do not see anywhere in the model the notion of Knowledge Management. We believe Knowledge Management is a distinct, cross-cutting discipline important enough to be called out in the Management of Government Resources area at the same level as Supply Chain Management, Financial Management, etc., and is both Agency-Specific and Government-Wide.*

Response: The FEA-PMO agrees with the commenter's point on the importance of Knowledge Management. However, we are not willing, at this time, to make Knowledge Management its own Line of Business in the Management of Government Resources area. Much like "Enterprise Resource Planning", Knowledge Management is an extremely broad function that cuts across information, people, and processes. The Sub-Functions of a potential Knowledge Management LOB would overlap with HR, Admin, and Technology Management Sub-Functions.

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### Information Management

**Comment:** *Information Lifecycle Management Business Line. Do you want to identify information dissemination in addition to information sharing? Sharing, to me, can imply some sort of quid pro quo, which may or may not be present.*

Response: Official Information Dissemination is designed to capture the transfer of information from the Federal Government to an external stakeholder (i.e. citizen, corporation, etc.). The exchange of information within the Federal Government is accounted for in the "Information Management" sub-function in the Information and Technology Management Line of Business.

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### Should every IT initiative be mapped to Information Management?

**Should a core accounting system be mapped to Financial Management and Information Management?**

No. Only systems that are automating the Information Management function for an organization should be mapped to Information Management. A system that simply manages information (which is arguably every information system) would not be mapped to Information Management.

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### Should every IT initiative be mapped to System Development

**Comment:** *In the "Management of Government Resources" area, it is unclear how the "Technology Management" function is to be applied. Since it addresses system development and maintenance, it seems to be directed at more than general IT management at the agency level. So should every IT 300 identify this as the BRM link? Should it be the only link? To give a precise example, should a supercomputer used for weather forecasting be identified under Technology Management or under Environmental Management / Environmental Monitoring and Forecasting? More guidance on this key area is needed.*

Response: The mappings should capture the purpose of the investment. If the investment is being made to provide Environmental Monitoring and Forecasting then it should be mapped accordingly. The only information systems that should be mapped to the Systems Development Sub-Function are those that support the automation of that sub-function. A weather forecasting system does not support the Systems Development Sub-Function, so it should not be mapped there. It is recommended, however, that agencies map to as many Lines of Business and Sub-functions that they deem necessary to describe the purpose of the investment and the functionality of the system.

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### Information Validation

**Comment:** *The BRM's "Information Lifecycle Management" includes the following three major components: -Information Collection -Record Retention -Information Sharing. To improve program integrity, we recommend that OMB consider including another critical element; "Information Validation." Information Validation may be further divided into two subcategories: front-end validation and the back-end validation. Front-end validation is performed during the application intake process, while the back-end procedure is usually performed periodically after the intake process.*

Response: The Information Life Cycle Management line of business and its accompanying subfunctions has been removed from the Support Delivery of Services business area and two new subfunctions have been added to the newly renamed Information and Technology Management (formerly Technology Management) line of business: Records Retention and Information Management. The validation of information is captured in the Information Management Sub-function.

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## Why is Workplace Policy Development in Administrative Management?

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### IT Security

**Comment:** Include an "IT Security" sub-function under Technology Management.

Response: The FEA-PMO agrees that an IT Security Sub-Function should be added to Technology Management. It has been added with the following definition- IT Security involves all functions pertaining to the securing of Federal data and systems through the creation and definition of security policies, procedures and controls covering such services as identification, authentication, and non-repudiation.

**Comment:** Workplace Policy Development and Management in Administration should be HR and is repetitive with the Resource Training Development subfunction there anyway. Workplace policy is just a type of training in the HR Training subfunction.

Response: Workplace Policy Development and Management belongs in Administrative Management as a result of its scope. While many of the policies addressed in this function do refer to the human resource area, there are others such as security or travel that address non-HR related activities. Furthermore, while one aspect of Resource Training and Development might entail instructing employees on these policies, the development and management of them is not a training function and must be addressed as its own subfunction.

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## FINANCIAL MANAGEMENT

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### Asset and Liability Management

**Comment:** Provide separate sub-functions for Asset Management and Liability Management

Response: The Financial Management Sub-Functions were established through communication with OMB's Office of Federal Financial Management and the Joint Financial Management Improvement Program's (JFMIP) working group for the Framework for Financial Management Systems. It was determined that Asset and Liability Management could be grouped together when describing the core financial processes that federal agencies perform. This does not mean that all "asset" management activities performed by the government are described solely by the Financial Management LOB. The operational aspects of asset management can be found in the following LOBs and SFs:

Management of assets for the public are found in the Mode of Delivery layer: SF: Public Resources, Facility and Infrastructure Management;

Management of government assets can be found in: (for central government building management) ... LOB: General Government; SF: General Property and Records Management;

(for agency asset management) ... LOB: Administrative Management; SF: Facilities, Fleet, and Equipment Management.

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### Help Desk Services should be in Technology Management

**Comment:** Help desk Services should be moved to Technology Management. Also added to that line of business should be a disaster recovery subfunction (for server backup centers and data centers). After these changes, all of "seat management" will be included in one area.

Response: Most agencies have Help Desk services for IT, but Help Desk services may be established to provide support for other areas as well, therefore "Help Desk Services" has been placed in the Administrative Management Line of Business to allow for all types of help desk support. Disaster recovery is captured in the sub-functions under the "Internal Risk Management and Mitigation" Line of Business.

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## HUMAN RESOURCE MANAGEMENT

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### Staff Retention

**Comment:** Human Resources Business Line. Add retention to the Staff Recruitment and Employment sub-function.

Response: Staff retention has been added to the definition for the "Staff Recruitment and Employment" sub-function.

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## ADMINISTRATIVE MANAGEMENT

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## Federal Retirement

**Comment: Consider adding a Federal Retirement Line of Business with Collect Contributions, Make Payments, and Process Claims Sub-Functions.**

Response: A Benefits Management Sub-Function is found in the "Human Resources" function within the Management of Government Resources Business Area for both Cross-Agency and Agency-specific Operations. This Sub-Function includes federal retirement benefits.

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## Three Sub-Functions for internal security in the BRM

**Comment: Security (Admin) vs. Security Clearance Management (Human Resources) have similar functionality where security verification / facility protection occurs.**

Response: The FEA-PMO contemplated adding a separate Internal Function for Security Management, but decided to keep three security related sub-functions in other Internal Functions. The two sub-functions cited by the commenter are related in this situation in that Security Clearance Management would feed the process for Security Management, but Security Management involves the security of an agency and its physical assets, while security clearance management involves managing the clearance process for an agency's employees. A third security sub-function – IT Security – is included in Information and Technology Management.