



October 2019

CIVILIAN PERSONNEL

Additional Guidance and Consistent Data Reporting Could Help Improve the Marine Corps' Budget Management

Accessible Version

GAO Highlights

Highlights of [GAO-20-148](#), a report to congressional committees

Why GAO Did This Study

The Marine Corps requested \$1.81 billion to pay for approximately 16,000 civilian employees in its fiscal year 2020 budget request. The Office of Management and Budget directs federal agencies to develop civilian personnel budgets by calculating workload requirements, the time needed to complete the work, and the number of FTEs needed. The Marine Corps uses a unique budget formulation process that relies on prior fiscal year budget data to calculate FTE estimates for future civilian personnel budget requests.

Senate Report 115-290, accompanying a bill for the DOD Appropriations Act, 2019, included a provision for GAO to review how the Marine Corps develops its civilian labor requirements for both FTEs and funding and examine the benefits and shortfalls of the Manage to Payroll process. This report (1) describes how the Marine Corps formulates its civilian personnel budget request and (2) assesses the Marine Corps' management of its civilian personnel budget and FTEs, including the benefits and weaknesses of the process.

GAO reviewed DOD civilian personnel budget policies, analyzed fiscal years 2013 through 2018 Marine Corps budget data that tracks spending and FTE allotment, and compared 2013 through 2018 budget execution data to budget request data.

What GAO Recommends

GAO recommends that the Marine Corps 1) updates its budget policies to include guidance for commands to manage civilian personnel to FTEs and 2) identifies and reconciles differences between its internal data and data OUSD(C) uses to formulate the Marine Corps' annual budget request. DOD concurred with both recommendations.

View [GAO-20-148](#). For more information, contact Brenda S. Farrell, 202-512-3604 or farrellb@gao.gov

CIVILIAN PERSONNEL

Additional Guidance and Consistent Data Reporting Could Help Improve the Marine Corps' Budget Management

What GAO Found

The Marine Corps develops its civilian personnel budget request using prior fiscal year budget execution data with adjustments based on input from sources such as the Office of the Undersecretary of Defense (Comptroller) [OUSD(C)] and the Department of the Navy. As part of the Department of the Navy, the Marine Corps' budget request is added to the Navy's overall budget request, which is incorporated into the Department of Defense's (DOD) overall budget request.

The Marine Corps manages its civilian personnel based on dollar amounts—not full-time equivalent (FTE) workload like the other military services—through an approach called Manage to Payroll. Specifically, while the Marine Corps requests a certain number of FTEs each year as required by policy, the Marine Corps distributes the funds it receives to its commands by dollar amount and not based on the FTEs requested. This approach has benefits, such as providing flexibility to employ civilians based on current mission requirements. However, under this approach, for fiscal year 2019, internal Marine Corps' data show that four of its commands are either exceeding or not reaching their requested dollar amounts. Marine Corps policy does not provide guidance to its commands to manage FTEs to requested amounts. Without such updated guidance the Marine Corps risks overspending or underspending on its personnel requirements. In addition, internal Marine Corps civilian FTE data for fiscal years 2013 through 2018 is not consistent with data that OUSD(C) used to formulate DOD's overall civilian personnel budget request, as shown in the figure below.

Internal Marine Corps' Civilian Full-Time Equivalent (FTE) Data Compared with Department of Defense (DOD) Data Provided in Its Civilian Personnel Budget Request for the Marine Corps, Fiscal Years 2013 through 2018

| Execution year | Internal Marine Corps FTE data | DOD FTE data provided in its budget request | Difference between Marine Corps data and DOD budget request data | Percent difference between Marine Corps data and DOD budget request data |
|----------------|--------------------------------|---------------------------------------------|------------------------------------------------------------------|--------------------------------------------------------------------------|
| 2018 | 15,348 | 15,527 | (179) | 1.15% |
| 2017 | 15,591 | 17,817 | (2,226) | 12.49% |
| 2016 | 15,237 | 15,471 | (234) | 1.51% |
| 2015 | 16,184 | 16,809 | (625) | 3.72% |
| 2014 | 16,912 | 17,290 | (378) | 2.18% |
| 2013 | 16,925 | 16,616 | 309 | 1.86% |

Source: GAO analysis of Marine Corps and DOD Budget Request data. | GAO-20-148

Note: Data is rounded to nearest whole FTE. Analysis uses Operations and Maintenance data and assumes Overseas Contingency Operations are not included in execution year data.

The Marine Corps has not identified or reconciled differences between its internal data compared to data submitted in the annual budget request. If information in the Marine Corps' budget request does not reflect internal Marine Corps data, then Congress and DOD leadership may not have sufficient and appropriate information to make informed planning decisions.

Contents

| | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|
| Letter | 1 |
| Background | 3 |
| The Marine Corps Develops Its Civilian Personnel Budget Request Using Prior Fiscal Year Data with Adjustments from Various Sources | 5 |
| Marine Corps Manages Its Civilian Personnel Budget Process Based on Dollar Amount, which Has Benefits and Weaknesses | 8 |
| Conclusions | 17 |
| Recommendations for Executive Action | 17 |
| Agency Comments | 18 |
| Appendix I: Scope and Methodology | 20 |
| Appendix II: Department of Defense Inspector General Reports on Military Departments' Civilian Pay Budgets | 22 |
| Appendix III: Comments from the Department of Defense | 25 |
| Agency Comment Letter | 27 |
| Appendix IV: GAO Contacts and Staff Acknowledgments | 30 |
| Related GAO Products | 31 |
| Tables | |
| Table 1: Difference Between Marine Corps Civilian Full Time Equivalents (FTE) Estimates and Previous Fiscal Year's Actuals, Fiscal Years 2013 through 2018 | 11 |
| Table 2: Marine Corps Major Subordinate Commands' Fiscal Year 2019 Civilian Personnel Requested Funding and Projected Spending | 13 |
| Table 3: Internal Marine Corps Civilian Full-time Equivalent (FTE) Data and Data Compared with Department of Defense (DOD) Data in DOD's Civilian Personnel Budget Request for the Marine Corps, Fiscal Years 2013 through 2018 | 15 |

Abbreviations

| | |
|---------|--------------------------------------------------------|
| DCHR | Director for Civilian Human Resources (DCHR). |
| DC P&R | Deputy Commandant for Programs and Resources |
| DOD | Department of Defense |
| FTE | Full-time equivalent |
| OMB | Office of Management and Budget |
| OUSD(C) | Office of the Under Secretary of Defense (Comptroller) |
| POM | Program Objective Memorandum |
| SABRS | Standard Accounting, Budgeting, and Reporting System |

This is a work of the U.S. government and is not subject to copyright protection in the United States. The published product may be reproduced and distributed in its entirety without further permission from GAO. However, because this work may contain copyrighted images or other material, permission from the copyright holder may be necessary if you wish to reproduce this material separately.



October 16, 2019

Congressional Committees

The Marine Corps requested \$1.81 billion to pay salaries and benefits for approximately 16,000 civilian employees in its fiscal year 2020 budget request, which is a \$64.9 million increase from its estimated actual fiscal year 2019 spending. The Marine Corps manages its civilian personnel budget process based on the dollar amount required to pay civilian personnel, instead of full-time equivalent (FTE) workload forecasts like the other military services, through an approach referred to as “Manage to Payroll”.¹ The Manage to Payroll approach was established by the Department of the Navy in October 1986 in response to congressional criticism of the Navy’s ability to manage its civilian personnel budget process.² The Marine Corps, as part of the Department of the Navy, also implemented Manage to Payroll in 1986.³ While the Marine Corps continues to use this approach, the Navy no longer uses Manage to Payroll to manage its civilian personnel budget process. Instead, the Navy formulates its civilian personnel budget based on civilian personnel full-time equivalent workload, as directed by the Office of Management and Budget (OMB) Circular A-11.⁴

¹A full-time equivalent is a standard measure of labor that reflects the total number of regular straight-time hours (i.e., not including overtime or holiday hours) worked by employees divided by the number of compensable hours applicable to each fiscal year.

²GAO, *Federal Personnel: Observations on the Navy’s Managing to Payroll Program*, [GAO/IGD-90-47](#) (Washington D.C.: Mar. 27, 1990).

³See Marine Corps Order 12510.2C, *Civilian Workforce Management: Managing to Payroll* (Dec. 10, 1986) (cancelled by Marine Corps Order 12510.2D, *Manage to Payroll* (Mar. 30, 2018)). Manage to Payroll is the collective administration and accountability of establishing positions and determining and evaluating the responsibilities, authority, and duties performed to accomplish the mission with maximum efficiency and productivity balanced against the labor budget.

⁴Office of Management and Budget (OMB) Circular No. A-11, *Preparation, Submission, and Execution of the Budget* (June 28, 2019). Throughout the report, we will refer to this as OMB Circular A-11. GAO, *A Glossary of Terms Used in the Federal Budget Process*, [GAO-05-734SP](#) (Sept. 2005). Budget formulation is the administrative process by which agencies and individual organizational units review current operations, program objectives, and future plans to assemble an annual budget request. During the formulation process, OMB is charged with broad oversight, supervision, and responsibility for coordinating and formulating a consolidated, executive branch-wide, budget submission.

Senate Report 115-290, accompanying a bill for the Department of Defense (DOD) Appropriations Act, 2019, included a provision that we review how the Marine Corps develops its civilian personnel labor requirements for both FTEs and funding and examine the benefits and shortfalls of Manage to Payroll.⁵ This report (1) describes how the Marine Corps formulates its civilian personnel budget request, and (2) assesses the Marine Corps' management of its civilian personnel budget and FTEs, including the benefits and weaknesses of the process.

For objective one, we obtained and reviewed Marine Corps, DOD, Department of Navy, and OMB policies that guide the budget formulation process to determine what requirements exist across each level of oversight and how the Marine Corps' civilian budget request is developed. We also discussed the process and requirements with agency officials.

For objective two, we reviewed the Marine Corps process for managing its civilian personnel budget and FTEs and compared it to Marine Corps orders and administrative memorandums. We also obtained and analyzed fiscal years 2013 through 2018 budget execution data from the Marine Corps that tracks both spending and FTE amounts across the major subordinate commands to determine how funding for civilian personnel is distributed to the major subordinate commands within the Marine Corps.⁶ We compared the Marine Corps' civilian personnel budget execution data from fiscal years 2013 through 2018 to its budget request. The Marine Corps maintains its civilian personnel data in the Standard Accounting, Budgeting, and Reporting System (SABRS). To assess the reliability of the Marine Corps' data, we reviewed policies and procedures related to data collection and entry, evaluated Marine Corps internal data reliability checks, and interviewed cognizant officials. Based on this, we determined

⁵S. Rep. No. 115-290, at 44 (June 28, 2018).

⁶Major subordinate commands are accountable to the Marine Corps' Programs and Resources office for their budget formulation and budget execution. Budget execution refers generally to the period during which the budget authority made available by appropriations remains available for obligation. Appropriations are budget authority to incur obligations and to make payments from the United States Treasury for specified purposes. An obligation is a definite commitment that creates a legal liability of the government for the payment of goods and services ordered and received, or a legal duty on the part of the United States that could mature into a legal liability by virtue of actions on the part of the other party beyond the control of the United States. During the budget execution process, an agency or individual organizational unit's task is to spend the money Congress has given it to carry out the objectives of its program legislation in accordance with fiscal statutes and appropriations. [GAO-05-734SP](#).

that the data were sufficiently reliable for the purposes of our reporting objectives. We interviewed Marine Corps, Department of Navy, and Office of the Under Secretary of Defense (Comptroller) [OUSD(C)] officials about their perceptions of the benefits and weaknesses of the Marine Corps budget execution process. This included interviewing Headquarters Marine Corps officials and Marine Corps major subordinate command officials to determine if the Marine Corps budget execution process differed based on organizational structure within the Marine Corps and what procedures exist for each major subordinate command if its actual FTEs do not reach or exceed its requested amount. Appendix I provides additional details about our scope and methodology.

We conducted this performance audit from November 2018 to September 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Organizational Roles and Responsibilities

Numerous organizations have roles and responsibilities in formulating and executing the Marine Corps' budget. Specifically:

- **Office of Management and Budget.** OMB directs federal agencies, including DOD and the military services, to develop, among other things, civilian personnel budget requests by calculating workload requirements, the time needed to complete the workload and the number of FTEs needed to perform the work for the upcoming fiscal year.⁷ Every year, OMB releases an update to OMB Circular A-11, which provides guidance for budget formulation for the upcoming fiscal year. OMB Circular A-11 states that federal agencies should take steps to assess, and as appropriate, restructure, retain, and

⁷See OMB Circular A-11. OMB Circular A-11 provides an overview of budgeting, including annual guidance on budget formulation, for agencies in the executive branch. DOD implements OMB Circular A-11's guidance through its Financial Management Regulation, DOD 7000.14-R.

resize their FTE counts to achieve missions as effectively and efficiently as possible.

- **Office of the Under Secretary of Defense (Comptroller).** OUSD(C) issues the DOD's Financial Management Regulation for budget formulation and execution.⁸ The Financial Management Regulation directs statutory and regulatory financial management requirements, systems, and functions for all organizational entities within the DOD.
- **Department of the Navy.** According to Department of Navy budget officials, they provide annual budget formulation guidance to all of the budget submitting offices, including the Marine Corps, through the Program Budget Information System, the Navy's Financial Management & Budget web portal. According to these officials, the guidance contains detailed instructions and updates for budget formulation, worksheets for checking the accuracy of submitted data, and points of contact for budget formulation questions.
- **Marine Corps Deputy Commandant for Programs and Resources (DC P&R).** DC P&R is the lead for determining and allocating civilian labor budgets. The DC P&R delegates this responsibility to the Fiscal Director who monitors major subordinate command and Headquarters Marine Corps labor budget execution to ensure compliance with Manage to Payroll budget controls. DC P&R sub-allocates the portion of the budget that will be executed against civilian labor by each major subordinate command and Headquarters Marine Corps. In order to hold the major subordinate commands and Headquarters Marine Corps accountable for exercising prudent Manage to Payroll authority, DC P&R monitors civilian labor execution and issues Manage to Payroll reports on a monthly basis.⁹
- **Marine Corps Director for Civilian Human Resources (DCHR).** DCHR provides program direction, technical advice, guidance and assistance to major subordinate commands, Headquarters Marine Corps staff agencies, and servicing human capital resource offices in carrying out Manage to Payroll responsibilities, with regard to position classification. DCHR also holds individuals with delegated classification authority accountable for carrying out effective Manage to Payroll responsibilities, when it comes to classification of position descriptions.¹⁰

⁸DOD 7000.14-R, *Financial Management Regulation* (May 2019).

⁹See Marine Corps Order 12510.2D, *Manage to Payroll* (March 3, 2018).

¹⁰See Marine Corps Order 12510.2D.

DOD Inspector General Report on Marine Corps Civilian Personnel Budget Development

In June 2018, the DOD Inspector General reported that, among other things, the Marine Corps did not justify or fully provide supporting documentation for how it determined its civilian personnel pay requirements for the Marine Corps' fiscal year 2017 budget request.¹¹ The Department of the Navy concurred with a DOD Inspector General recommendation that the Department of Navy establish and implement controls for the civilian pay budget process. The Marine Corps stated in an unpublished written response that it is reviewing its current budget formulation and other metrics through the fiscal year 2020 budget formulation process, with a plan of implementing an updated budget documentation process for the fiscal year 2021 budget request. The DOD Inspector General also found that the Marine Corps did not determine civilian pay funding levels using FTEs calculated from projected hours to be worked, as required by OMB. As a result, the DOD Inspector General recommended that the Marine Corps determine its budgeted civilian pay funding levels using FTEs calculated based on projected hours to be worked, as required by OMB. In its unpublished written response to the DOD Inspector General report, the Marine Corps stated that it determines FTEs in accordance with OMB and is working to provide greater emphasis on FTEs in its budget documents. See appendix II for more details on the DOD Inspector General's report.

The Marine Corps Develops Its Civilian Personnel Budget Request Using Prior Fiscal Year Data with Adjustments from Various Sources

The Marine Corps formulates its annual civilian personnel budget request using prior fiscal year budget execution data as a baseline, then makes adjustments for the upcoming fiscal year based on inputs from various sources like the Department of the Navy and OUSD(C).

¹¹DOD, Office of the Inspector General, *Department of the Navy Civilian Pay Budget Process*, DODIG-2018-129 (Alexandria, VA: June 20, 2018).

First, according to Marine Corps officials, the Marine Corps gathers information from several sources to start the budget formulation process including previous fiscal year budget information, information from the Program Objective Memorandum (POM) process, feedback from Marine Corps commands, OUSD(C) guidance, Department of Navy guidance, and the National Security Strategy.¹² To develop its civilian personnel budget request for fiscal year 2020, the Marine Corps used fiscal year 2018 information as a starting point and incorporated changes made through the POM process and other inputs, according to Marine Corps Programs and Resources officials.¹³

Second, Marine Corps officials explained during the budget formulation process, the Department of the Navy publishes a Civilian Pricing Tool that financial management and budget officials use to evaluate civilian personnel pricing estimates. The Marine Corps has access to the Civilian Pricing Tool throughout the budget process. After all the inputs are included and the pricing calculations are completed, the Marine Corps officials explained, the Deputy Commandant, Programs and Resources presents the POM to the Commandant of the Marine Corps for approval and inclusion in the Department of the Navy's overall budget request.

Third, according to Department of Navy officials, they conduct a thorough analytic review of each line item's dollar amount and FTE request in the Marine Corps' budget request before submitting its total budget to OUSD(C). Once the Department of the Navy has reviewed and approved of the Marine Corps budget request, including its request for civilian personnel funding, the Department of the Navy sends the budget request to OUSD(C) for review.

Fourth, according to Department of the Navy officials, OUSD(C) reviews the Marine Corps' civilian personnel budget request as part of the Department of the Navy's overall budget request submission, including any change in year-to-year FTE growth, to determine if the Marine Corps

¹²The POM is the final product of the programming process within DOD and displays the resource allocation decisions of the military departments in response to and in accordance with planning and programming guidance.

¹³Because budget execution data for the current fiscal year is incomplete, the Marine Corps develops its budget request for the upcoming fiscal year using the budget execution data from the preceding fiscal year. For example, during fiscal year 2019, to develop its fiscal year 2020 budget request, the Marine Corps used budget execution data from fiscal year 2018.

properly justified these changes. Once OUSD(C)'s review of the Department of the Navy's budget submission is complete, the Navy's budget request is submitted with the other military department's budget requests to OMB for review. During this period, according to Department of the Navy officials, OMB has monthly conversations with the military departments, including the Department of the Navy, about its budget formulation process. OMB has the authority to raise concerns with a particular military department's budget request during a passback period.¹⁴ Once the passback period with OMB is complete and the budget request is approved by OUSD(C), the entire Department of Navy budget is submitted to the Office of the Secretary of Defense.

Finally, according to Department of the Navy officials, the Office of the Secretary of Defense makes adjustments to the Department of the Navy's budget request according to DOD and OMB priorities, and after OUSD(C) provides feedback to each military service, the military services' budget request, as modified, is incorporated into the President's budget request.¹⁵

¹⁴[GAO-05-734SP](#). Executive branch agencies must submit their budget requests and other initial materials to OMB in the early fall. During this review phase, OMB staff have informal discussions with the agencies about their budget proposals in light of presidential priorities, program performance, and any budget constraints. In late November, OMB passes back budget decisions to the agencies on their budget requests, in what is known as an OMB "passback." These decisions may involve, among other things, funding levels, program policy changes, and personnel ceilings. The agencies may appeal decisions with which they disagree and if OMB and the agency cannot reach agreement, the issue may be taken to the President.

¹⁵[GAO-05-734SP](#). The President's budget request is the document sent to Congress by the President in January or February of each year, as required by law (31 U.S.C. § 1105) for the fiscal year that starts the following October. The document requests new budget authority for federal programs and estimates federal revenues and outlays for the upcoming fiscal year and 4 subsequent outyears for the executive branch. Agencies later submit budget justifications to the appropriate Congressional appropriations committees, as prescribed by OMB, to explain changes between the current appropriation and the amounts requested for the next fiscal year.

Marine Corps Manages Its Civilian Personnel Budget Process Based on Dollar Amount, which Has Benefits and Weaknesses

Marine Corps Manages the Execution of Its Civilian Personnel Budget Execution Based on Dollar Amount, Not FTEs

The Marine Corps manages the execution of its civilian personnel budget based on the dollar amount, not FTE workload forecasts, through an approach referred to as “Manage to Payroll.” Specifically, the Manage to Payroll approach places an emphasis on spending the amount of dollars or funding available for civilian personnel and not on executing a calculated full-time equivalent civilian personnel workload. Further, Marine Corps Order 12510.2D requires officials delegated Manage to Payroll authority to be accountable for establishing positions to accomplish the mission with maximum efficiency and productivity balanced against the civilian labor budget. The Manage to Payroll approach is comprised of three separate functions: (1) position management, (2) position classification, and (3) compensation management.¹⁶

- **Position management.** The process of organizing and structuring organizations to accomplish their mission with maximum economy, efficiency, and productivity. Managers and supervisors determine the type of organizational structure needed to fulfill the functions assigned to a particular unit, how many positions are needed, how positions should be designed, and the most cost effective way of filling the requirement.
- **Position classification.** The function that assigns an individual position to the appropriate pay plan, occupational series, title, and grade.
- **Compensation management.** For positions where funding levels are prescribed by the Deputy Commandant for Programs and Resources, the major subordinate commands and Headquarters Marine Corps staffing agencies must ensure salary costs and other cost drivers (i.e.

¹⁶See Marine Corps Order 12510.2D.

overtime, awards, incentives, etc.) do not exceed the civilian labor funding levels.

To implement this approach, the Marine Corps' Director for Civilian Human Resources, among other things, provides program direction, technical advice, guidance and assistance to the major subordinate commands, Headquarters Marine Corps staff agencies, and servicing human resources offices for carrying out Manage to Payroll responsibilities. In order to hold individuals with delegated classification authority accountable for carrying out effective Manage to Payroll responsibilities, the Director for Civilian Human Resources also conducts consistency reviews in coordination with the human resources offices to validate proper classification of positions. These reviews involve verifying positions are classified in accordance with Office of Personnel Management classification standards and within sound position management principles.

Additionally, the Marine Corps Deputy Commandant for Programs and Resources is the lead for determining and allocating the Marine Corps' civilian personnel budget and sub-allocates the portion of the budget that will be spent against civilian labor by each major subordinate command and Headquarters Marine Corps.

Benefits and Weaknesses Exist with the Marine Corps' Management of Its Civilian Personnel Budget Execution

According to Marine Corps officials, there are benefits to using the Manage to Payroll approach for managing its civilian personnel budget execution. These benefits, according to Marine Corps officials, include:

- Flexibility in spending. This approach provides flexibility to the major subordinate commanders by allowing them the ability to prioritize their own current mission requirements and functions rather than spending their civilian personnel budget on workload requirements used to formulate a civilian personnel budget request during the previous fiscal year.
- Management of personnel requirements. The process allows commanders to manage their personnel requirements to fit with mission priority rather than adhering to the FTE-based workload requirements used to formulate their civilian personnel budget request.

- **Visibility.** This process enables officials at Marine Corps Programs and Resources and Headquarters Marine Corps to have direct control over and closely monitor the major subordinate commands' civilian personnel budget execution.

However, weaknesses exist with the Marine Corps' Manage to Payroll approach to managing its civilian personnel budget execution. Our analysis of the Department of the Navy's annual budget request, which includes Marine Corps civilian personnel FTE data, found that the number of civilian FTEs the Marine Corps reported does not match the number of civilian FTEs it requested. This discrepancy between the number of FTEs requested and the number of FTEs reported is a result of the Marine Corps managing civilian personnel to dollar amounts and not to FTEs. Specifically, funding provided by Congress annually for the Marine Corps to manage its civilian personnel is based on the number of FTEs the Marine Corps requested for a particular fiscal year. However, during the budget execution process, Headquarters Marine Corps distributes funding to the major subordinate commands by dollar amount and not by FTEs requested.

The President's budget request, which is the sole single document with budget information for the entire government, contains (1) a record of actual receipts and spending levels for the fiscal year just completed, (2) a record of current-year estimated receipts and spending, and (3) estimated receipts and spending for the upcoming fiscal year and 9 years beyond, as proposed by the President.¹⁷ Additionally, OMB Circular A-11 requires that current year FTE estimates should be consistent with previous year actuals, should be fully funded, and should be very close to the actual usage reported at the end of the fiscal year. For example, the estimates in the previous year's budget should be very close to the actuals published in the current budget.¹⁸ Table 1 shows the difference between the Marine Corps FTEs estimates in its annual civilian personnel budget request and its reported usage of actual FTEs for the previous year's budget execution contained in the budget requests from fiscal years 2013 through 2018.

¹⁷ See [GAO-05-734SP](#).

¹⁸ See OMB Circular A-11.

Table 1: Difference Between Marine Corps Civilian Full Time Equivalents (FTE) Estimates and Previous Fiscal Year’s Actuals, Fiscal Years 2013 through 2018

| Fiscal year budget request | FTEs estimated in budget request | Reported usage of prior fiscal year’s actual FTEs | Difference between FTE estimates and reported usage of FTEs | Percent difference between FTE estimates and reported usage of FTEs |
|----------------------------|----------------------------------|---------------------------------------------------|-------------------------------------------------------------|---------------------------------------------------------------------|
| 2018 | 15,668 | 15,527 | 141 | 0.90 |
| 2017 | 15,396 | 17,817 | (2,421) | -15.72 |
| 2016 | 16,209 | 15,471 | 738 | 4.55 |
| 2015 | 16,695 | 16,809 | (114) | -0.68 |
| 2014 | 16,303 | 17,290 | (987) | -6.05 |
| 2013 | 17,764 | 16,616 | 1,148 | 6.46 |

Source: GAO analysis of Marine Corps budget justification data presented in the Department of the Navy’s OP-8 exhibit in support of DOD’s annual budget request. | GAO-20-148.

Note: Only uses Operation and Maintenance data and assumes Overseas Contingency Operations funds are not included in execution year data.

When asked about the difference between estimates and reported usage of actual FTEs, a Headquarters Marine Corps official stated that they were generally unaware of the importance of the budget data in measuring the degree to which an agency was exceeding or not reaching its requested FTEs. However, the official also acknowledged that a possible consequence of not managing to estimated FTEs could be a reduction in future funding for civilian personnel because budget data provided to Congress for civilian personnel is based on FTE workload and not the amount of dollars spent on civilian personnel. Therefore, a result of the Marine Corps managing to dollar amounts and not to FTEs may result in Congressional decision-making based on incorrect data, which may result in the major subordinate commands having to eliminate civilian positions.

Department of the Navy officials confirmed this and told us that the Marine Corps’ use of Manage to Payroll puts Department of the Navy resources at risk of reduction. Additionally, according to Department of the Navy officials, the Navy’s financial management branch does not support the Marine Corps’ use of Manage to Payroll and recommends that the Marine Corps begin to manage its civilian personnel resources using the same process as the Navy’s other budget submitting offices, by formulating civilian personnel funding requests with estimated FTE requirements and then monitoring execution of the budget by actual FTEs. Additionally, by formulating and monitoring civilian personnel budgets by FTEs, there would be more transparency in how the Marine Corps is actually executing its civilian personnel budget.

Our review of the Marine Corps' policy for managing its civilian personnel budget execution found that it does not provide guidance for major subordinate commands to manage actual civilian FTEs to requested amounts. Specifically, Marine Corps Order 12510.2D provides budget execution requirements but does not include requirements on managing civilian FTEs.¹⁹ According to officials with Marine Corps Programs and Resources, Marine Corps Order 12510.2D is a Manpower and Reserve Affairs Department document that focuses on personnel actions rather than explicitly establishing cost controls. Specifically, the order states that individuals delegated Manage to Payroll authority are accountable for establishing positions to accomplish the mission with maximum efficiency and productivity balanced against the labor budget.

Federal internal control standards state that management should document the organization's internal control responsibilities in its policies at the appropriate level of detail to allow management to monitor the control activity effectively.²⁰ Without updated guidance for major subordinate commands to formulate and execute its civilian personnel budget to estimated FTEs, the Marine Corps risks overspending or underspending on its personnel requirements. Additionally, decision makers may not have sufficient information to effectively and efficiently provide funding for Marine Corps civilian personnel.

Internal Marine Corps Spending Data Does Not Align with Budget Request Data

Our analysis of Marine Corps internal spending data found that the dollar amount the Marine Corps is projecting to spend on civilian personnel for fiscal year 2019 is \$1,749,444,000, which is in line with the \$1,750,500,000 provided in its budget request for managing civilian personnel. However, our analysis of 15 major subordinate commands found that four of them are either exceeding or not reaching their requested dollar amounts by \$5 million dollars or more. For example, for fiscal year 2019, Marine Corps Systems Command is projected to overspend its requested civilian personnel dollar amount by \$24.7 million and Marine Corps Cyber Command is projected to fall short of its requested civilian personnel dollar amount by \$7.9 million dollars in fiscal

¹⁹Marine Corps Order 12510.2D.

²⁰See GAO, *Standards for Internal Control in the Federal Government*, [GAO-14-704G](#) (Washington, D.C. Sept. 2014).

year 2019.²¹ Table 2 shows the variation in projected dollar amount by major subordinate commands for fiscal year 2019.

Table 2: Marine Corps Major Subordinate Commands' Fiscal Year 2019 Civilian Personnel Requested Funding and Projected Spending

| Major Subordinate Command | Civilian personnel funding requested for fiscal year 2019 (thousands) | Projected spending on civilian personnel for fiscal year 2019 (thousands) | Projected spending over/under requested amount (thousands) |
|------------------------------------------|-----------------------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------|
| Headquarters Marine Corps | \$230,815 | \$223,916 | \$6,899 |
| Marine Corps Recruiting Command | \$22,356 | \$23,969 | (\$1,613) |
| Marine Corps Logistics Command | \$80,021 | \$78,615 | \$1,406 |
| Marine Forces Europe and Africa | \$4,983 | \$3,271 | \$1,712 |
| Marine Forces South | \$1,032 | \$1,147 | (\$115) |
| Marine Forces Pacific | \$32,335 | \$30,040 | \$2,295 |
| Marine Forces Command | \$32,500 | \$32,710 | (\$210) |
| Marine Corps Combat Development Command | \$44,119 | \$40,854 | \$3,265 |
| Marine Corps Systems Command | \$257,815 | \$282,543 | (\$24,728) |
| Training and Education Command | \$135,314 | \$128,306 | \$7,008 |
| Marine Corps Installations Command | \$832,578 | \$835,329 | (\$2,751) |
| Marine Forces Central Command | \$2,589 | \$2,522 | \$67 |
| Marine Forces Northern Command | \$2,075 | \$2,049 | \$26 |
| Marine Forces Special Operations Command | \$5,953 | \$6,052 | (\$99) |

²¹ Marine Corps Systems Command officials told us that the command was projected to exceed its budget request by \$18 million, rather than by the \$24.7 million dollars shown in SABRS projections. The officials explained that in prior years the command has executed its civilian personnel budget within the 2 percent Manage to Payroll guidance issued by Headquarters Marine Corps. However, according to these officials, due to a shift in fiscal year 2018 POM assumptions that include \$6 billion in program growth from the 2017 budget request through the fiscal year 2020 POM and new requirements and business reform initiatives, Marine Corps Systems Command cannot achieve the fiscal year 2018 POM directed civilian personnel reductions. The Command expects to resume executing its civilian personnel budget within the 2 percent Manage to Payroll control going forward.

| Major Subordinate Command | Civilian personnel funding requested for fiscal year 2019 (thousands) | Projected spending on civilian personnel for fiscal year 2019 (thousands) | Projected spending over/under requested amount (thousands) |
|----------------------------------|-----------------------------------------------------------------------|---------------------------------------------------------------------------|------------------------------------------------------------|
| Marine Forces Cyberspace Command | \$66,015 | \$58,121 | \$7,894 |
| Total | \$1,750,500 | \$1,749,444 | \$1,056 |

Source: GAO analysis of Marine Corps internal budget data. | GAO-20-148

Notes: When spending projections exceed requested dollar amounts, it could result in exceeding the requested amount. When spending projections fall short of requested amounts, it could result in not reaching the requested amount. This table only uses civilian personnel data for the Marine Corps Operation and Maintenance account and assumes Overseas Contingency Operations funds are not included in projections.

Marine Corps Programs and Resources officials stated that when a major subordinate command exceeds its requested dollar amount, the major subordinate command is not compensated from larger Marine Corps accounts, but the command must find additional funding from within its other accounts, which may mean a funding cut to another program to make up the difference.

Our review of Marine Corps civilian personnel data also found that Marine Corps data on civilian FTEs is not consistent with data that OUSD(C) uses to formulate DOD’s request for civilian personnel FTEs in its annual budget submission. The Marine Corps uses a database called SABRS to maintain and track civilian personnel FTE data for fiscal years 2013 through 2019.²² To develop DOD’s defense-wide annual civilian personnel budget request, OUSD(C) uses data from the Program Resources Collection Process system.²³ Our review of Marine Corps data maintained in SABRS found that it does not match the data DOD provided in its annual budget request submissions, which comes from OUSD(C)’s Program Resources Collection Process system, for fiscal years 2013 through 2018. Table 3 shows the difference between the Marine Corps’ internal civilian FTE data in SABRS and the civilian FTE data provided in the annual budget request.

²²While SABRS tracks the Marine Corps’ budget execution data for 2019, we did not analyze 2019 data because it was not available at the time we collected the data.

²³Program Resources Collection Process is a DOD web-based application designed to prepare and manage direct program budget details.

Table 3: Internal Marine Corps Civilian Full-time Equivalent (FTE) Data and Data Compared with Department of Defense (DOD) Data in DOD’s Civilian Personnel Budget Request for the Marine Corps, Fiscal Years 2013 through 2018

| Execution year | Internal Marine Corps FTE data* | DOD data in its budget request | Difference between internal Marine Corps data and DOD data in its budget request | Percentage difference between internal Marine Corps data and Data in DOD’s budget request |
|----------------|---------------------------------|--------------------------------|----------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|
| 2018 | 15,348 | 15,527 | (179) | 1.15% |
| 2017 | 15,591 | 17,817 | (2,226) | 12.49% |
| 2016 | 15,237 | 15,471 | (234) | 1.51% |
| 2015 | 16,184 | 16,809 | (625) | 3.72% |
| 2014 | 16,912 | 17,290 | (378) | 2.18% |
| 2013 | 16,925 | 16,616 | 309 | 1.86% |

Source: GAO analysis of Marine Corps Standard Accounting, Budgeting, and Reporting System data and DOD data presented in the Department of the Navy’s OP-8 exhibit in support of DOD’s annual budget request. | GAO-20-148

*Rounded to Nearest Whole FTE.

An OUSD(C) official told us that the two sources should match because all data, including civilian personnel dollar amounts and FTEs, should be submitted and processed through the Program Resources Collection Process system. Marine Corps officials explained that they were aware of the variations between their internal FTE data and the DOD budget request data. The officials further explained that one instance of variation in the data occurs because the Department of the Navy uses another database, the Work Year Personnel Cost system, to prepare its annual budget request, which includes the Marine Corps’ request for civilian personnel FTEs, before submitting the request to OUSD(C).²⁴

According to the Marine Corps officials, the Work Year Personnel Cost system automatically deletes error transactions while SABRS does not, as error transactions in SABRS are manually edited. These types of error transactions occur because they did not pass one or more edits in SABRS, did not find the required matching transaction, or have some other issue that is keeping the transaction from processing.²⁵ The Marine Corps corrects error transactions manually while errors transactions in the

²⁴The Work Year Personnel Cost system is maintained by the Defense Finance and Accounting Service. The Department of the Navy uses the Work Year Personnel Cost System to track its civilian labor costs. Data from the system supports formulation of the yearly budget request submissions to the Office of Management and Budget and the Office of Personnel Management.

²⁵See Marine Corps Order 7300.21B, *Marine Corps Financial Management Standard Operating Procedure Manual* (May 18, 2015).

Work Year Personnel Cost System are deleted automatically without correction, which creates differences in the data between the two systems. Marine Corps officials stated that, as a result, the Work Year Personnel Cost database typically underestimates Marine Corps civilian FTEs, and that variations in actual FTE data between the SABRS and Work Year Personnel Cost databases explains why it appears the Marine Corps is not reaching its requested civilian personnel FTEs.

The Marine Corps has not identified or reconciled differences between internal Marine Corps civilian personnel FTE data compared to data submitted in the annual budget request. Additionally, federal internal control standards state that management should use quality information to achieve the entity's objectives; that reliable internal and external sources provide data that are reasonably free from errors and faithfully represent what they purport to represent; and that information is appropriate, current, complete, accurate, accessible, and provided on a timely basis.²⁶

Congress and DOD leadership rely on information presented in an agency's annual budget request to help determine policies and to make financial decisions. Our prior work has found that civilian FTEs, by themselves, may not be reliable measures of the cost of the civilian personnel workforce and changes in civilian FTEs may not achieve commensurate changes in monetary spending.²⁷ However, in that report we also noted that, according to OUSD(C) officials, FTEs are typically the primary measure OUSD(C) uses in managing and reporting on DOD's civilian workforce. Therefore, without reliable Marine Corps civilian personnel data, senior leaders in DOD and decision makers in Congress may not have sufficient and appropriate information to make informed planning and spending decisions and may risk funding not accurately tracking with actual needs.

²⁶GAO-14-704G.

²⁷GAO, *Civilian and Contractor Workforces Savings*, GAO-16-172 (Washington, D.C.: Dec. 23, 2015).

Conclusions

To develop its annual civilian personnel budget request, the Marine Corps uses a process that relies on prior fiscal year budget execution data instead of calculating civilian personnel workload requirements and the number of FTEs needed to perform the work. Without updated guidance for the major subordinate commands to manage their respective civilian personnel budget execution to requested FTEs, the Marine Corps risks overspending or underspending on its personnel requirements. Further, assessments of Marine Corps civilian personnel FTE and DOD budget data found that the Marine Corps' data does not match comparable data DOD reported in its annual budget request documentation. Congress and DOD leadership rely on FTE information presented in the Marine Corps' annual budget request to help determine policies and to make financial decisions. Without civilian personnel data that are free from errors and are consistent with how the Marine Corps is managing its civilian personnel, senior leaders in DOD and decision-makers in Congress will not be able to make informed planning and spending decisions and may risk funding not accurately tracking with actual needs. As a result, the Marine Corps risks having its annual civilian personnel funding reduced.

Recommendations for Executive Action

We are making the following two recommendations to the Secretary of the Navy:

The Secretary of the Navy should ensure that the Commandant of the Marine Corps updates the Marine Corps' civilian personnel budget formulation and execution policies to include guidance for the major subordinate commands to manage civilian personnel to FTEs. (Recommendation 1)

The Secretary of the Navy should ensure that the Commandant of the Marine Corps identifies and reconciles any differences between the Marine Corps' internal civilian personnel data and the civilian personnel data the Department of the Navy uses to support its annual budget request. (Recommendation 2)

Agency Comments

We provided a draft of this report to DOD for review and comment. In written comments, DOD concurred with both recommendations and noted actions that the Marine Corps plans to take. DOD's comments are reprinted in appendix III. DOD also provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Secretary of Defense, the Secretary of the Navy, and the Commandant of the Marine Corps. In addition, this report is available at no charge on the GAO website at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3604 or farrellb@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix IV.



Brenda S. Farrell
Director
Defense Capabilities and Management

List of Committees

The Honorable James M. Inhofe
Chairman

The Honorable Jack Reed
Ranking Member
Committee on Armed Services
United States Senate

The Honorable Richard Shelby
Chairman

The Honorable Dick Durbin
Ranking member
Subcommittee on Defense
Committee on Appropriations
United States Senate

The Honorable Adam Smith
Chairman

The Honorable Mac Thornberry
Ranking Member
Committee on Armed Services
House of Representatives

The Honorable Pete Visclosky
Chairman

The Honorable Ken Calvert
Ranking Member
Subcommittee on Defense
Committee on Appropriations
House of Representatives

Appendix I: Scope and Methodology

For our first objective, to determine how the Marine Corps develops its civilian personnel budget request, we obtained and reviewed Marine Corps, Department of Defense (DOD), Department of Navy, and Office of Management and Budget policies that guide the budget process in order to determine what requirements exist across each level of oversight and discussed these requirements with agency officials. To further analyze the Manage to Payroll process, we also obtained and reviewed Marine Corps Program Objective Memorandum requests, budget formulation and execution documents, budget analyses, financial spreadsheets, and budget presentations. We also interviewed responsible officials about these processes and requirements.

For our second objective, to assess the Marine Corps' management of its civilian personnel budget and FTEs, we reviewed the Marine Corps' process for managing its civilian personnel budget and FTEs and compared it against Marine Corps orders and administrative messages.¹ To examine Marine Corps policies for budget data entry, coordination, and management, we compared them to the Marine Corps Financial Management Standard Operating Procedure Manual.² To determine how the Marine Corps manages its civilian personnel funding, how the Marine Corps measures budget execution by major subordinate command, and how the Marine Corps monitors and collects data on budget execution, we interviewed officials from Marine Corps Programs and Resources.

To identify Manage to Payroll requirements and Marine Corps policies for managing its civilian personnel we interviewed officials from Marine Corps Manpower and Reserve Affairs. We also interviewed officials in the Marine Corps Programs and Resources office, Marine Corps Systems Command, Marine Corps Cyber Command, the Department of the Navy,

¹See MARADMIN 044/14, *Manage-to-Payroll Interim Guidance* (Jan. 4, 2014); MARADMIN 440/10, *Revised Civilian Manpower Requirement Process* (Aug. 6, 2010) (cancelled by MARADMIN 229/13, *Revised Civilian Manpower Requirement Process* (Apr. 30, 2013)); Marine Corps Order 12510.2D, *Manage to Payroll Guidance* (Mar. 3, 2018).

²See Marine Corps Order 7300.21B, *Marine Corps Financial Management Standard Operating Procedure Manual* (May 18, 2015).

and the Office of the Under Secretary of Defense (Comptroller) about their perceptions of the benefits and weaknesses of the Manage to Payroll process. To measure whether the Marine Corps exceeded or fell below its civilian personnel full-time equivalents (FTE) budget request, we compared the Marine Corps' civilian personnel budget execution data to its budget request data from the same fiscal year to determine if Marine Corps actual FTEs matched this data from year to year. To measure whether the Marine Corps was consistently exceeding or falling below its FTE budget request at each major subordinate command, we reviewed Marine Corps budget execution spreadsheets displaying end-of-year budget and FTE projections.

To provide a statistical measurement of the Marine Corps' efforts to manage its civilian personnel budget, we obtained and analyzed fiscal year 2013-18 budget execution data from the Marine Corps' Standard Accounting, Budgeting, and Reporting System (SABRS) that tracks both dollar amount and FTE allotment across the major subordinate commands. We also used SABRS data to determine how funds are allocated to the major subordinate commands within the Marine Corps. To determine if differences in reported FTE totals existed between the Marine Corps' internal data and publically available data, we compared SABRS' civilian personnel FTE actual data from fiscal year 2013-18 to its requested FTEs. To assess the reliability of the Marine Corps' data, we reviewed policies and procedures related to data collection and entry, evaluated Marine Corps internal data reliability checks, and interviewed cognizant officials. Based on this, we determined that the data were sufficiently reliable for the purposes of our reporting objectives.

We conducted this performance audit from November 2018 to August 2019 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix II: Department of Defense Inspector General Reports on Military Departments' Civilian Pay Budgets

In June 2018, the Department of Defense (DOD) Inspector General issued a report on the civilian personnel budget formulation process of the Department of the Navy, which included information on the Marine Corps.¹ In its report, the DOD Inspector General found that the Marine Corps could not justify or support how it determined its civilian personnel pay requirements for fiscal year 2017's Marine Corps budget request. Specifically, the report noted that Marine Corps budget officials could not fully explain the rationale for their civilian pay budget adjustments. According to the DOD Inspector General report, the Marine Corps did not maintain documentation to support these budget adjustments or material showing how it calculated average basic compensation amounts and benefit rates. The DOD Inspector General also reported that Marine Corps officials were unable to explain or provide support regarding the calculation of the civilian pay dollars and full-time equivalents (FTE) associated with these adjustments.

In its unpublished written response to the DOD Inspector General's report, the Marine Corps concurred with the DOD Inspector General's recommendation that the Marine Corps determine budgeted civilian pay

¹From 2017 to 2019, the DOD Inspector General issued reports on the civilian personnel budget formulation process of the Army, the Air Force, the Department of the Navy—including the Marine Corps—and DOD. See DOD, Office of the Inspector General, *Requirements for the Air Force Civilian Pay Budget Still Need Improvement*, DODIG-2017-039 (Alexandria, VA: Jan. 5, 2017); DOD, Office of the Inspector General, *The U.S. Army Civilian Pay Budget Process*, DODIG-2018-055 (Alexandria, VA: March 8, 2018); DOD, Office of the Inspector General, *Department of the Navy Civilian Pay Budget Process*, DODIG-2018-129 (Alexandria, VA: June 20, 2018); DOD, Office of the Inspector General, *DoD Civilian Pay Budgeting Process*, DODIG-2019-041 (Alexandria, VA: Jan. 3, 2019).

funding levels using full-time equivalents calculated based on projected hours to be worked, as required by Office of Management and Budget Circular A-11. The Marine Corps' written response also acknowledged that having source data, assumptions, calculations, and better documentation related to budget formulation would provide for retention of institutional knowledge and would benefit budget officials formulating future budgets. The Marine Corps' unpublished written response also stated that it is reviewing other command metrics within the department, which will be performed throughout the remainder of the present budget cycle with a plan of implementation during the next budget cycle.

The DOD Inspector General's report stated that the Marine Corps did not determine civilian pay funding levels using FTEs calculated from projected hours to be worked, as directed in Office of Management and Budget (OMB) Circular A-11.² According to the DOD Inspector General's report, in its fiscal year 2017 budget formulation, Marine Corps officials stated that they considered FTEs to be the same as end strength for budget formulation purposes, assuming that one person would be on board for an entire year even though these officials acknowledged that this was not expected to be the reality during budget execution. As a result, the DOD Inspector General recommended that the Marine Corps determine its budgeted civilian pay funding levels using FTEs calculated as required by OMB Circular A-11 requirements.

In its unpublished written response to the DOD Inspector General's report, the Marine Corps stated that it determines FTEs in accordance with OMB Circular A-11. Marine Corps Programs & Resources officials told us that they use cumulative hours paid in a fiscal year divided by the number of work hours in that fiscal year to generate the number of FTEs executed. These officials told us that they then divide the cumulative amount paid by the number of FTEs to receive the average work year cost for that fiscal year. Marine Corps officials stated that Programs & Resources budget officials then adjust the civilian personnel budget request during the Department of Navy pricing tool time frame, typically reducing FTEs by the recommendation provided by the tool, which uses

²OMB Circular A-11 states that federal agencies should take steps to assess and as appropriate, restructure, retain, and resize its FTE count to achieve its missions as effectively and efficiently as possible. OMB Circular A-11 also requires agencies to determine their current year and upcoming budget year FTE employment estimates either by dividing the estimated total number of regular hours by the number of compensable hours in each fiscal year or by dividing regular hours worked during the biweekly pay periods by 2080 hours.

**Appendix II: Department of Defense Inspector
General Reports on Military Departments'
Civilian Pay Budgets**

18 months of execution data. Marine Corps officials told us that, as result of the DOD Inspector General's report, they are working to provide greater emphasis on FTEs in their budget formulation documents.

Appendix III: Comments from the Department of Defense



THE SECRETARY OF THE NAVY
WASHINGTON DC 20350-1000

October 4, 2019

Mrs. Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Mrs. Farrell:

This is the Department of Defense (DoD) response to the Government Accountability Office (GAO) Draft Report GAO-19-689, "Civilian Personnel: Additional Guidance and Consistent Data Reporting Could Help Improve the Marine Corps' Budget Management," dated September 4, 2019 (GAO Code 103082).

Enclosed are our comments to the GAO recommendations. We appreciate the opportunity to review and comment on the draft audit report.

My point of contact for this audit is Mr. Charles K. Dove, (703) 693-9724 or charles.dove@usmc.mil and HQMCAuditLiaisons@usmc.mil.

Sincerely,

A handwritten signature in blue ink that reads "R. Spencer".

Richard V. Spencer

Enclosure:
As stated

GAO DRAFT REPORT DATED SEPTEMBER 4, 2019
GAO-19-689 (GAO CODE 103082)

**“CIVILIAN PERSONNEL: ADDITIONAL GUIDANCE AND CONSISTENT DATA
REPORTING COULD HELP IMPROVE THE MARINE CORPS’ BUDGET
MANAGEMENT”**

DEPARTMENT OF DEFENSE COMMENTS TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1: The GAO recommends that the Secretary of Navy should ensure that the Commandant of the Marine Corps updates Marine Corps’ civilian personnel budget formulation and execution policies to include guidance for the major subordinate commands to manage civilian personnel to full-time equivalents (FTEs).

DOD RESPONSE: We concur with the recommendation. The Marine Corps has included more emphasis for major subordinate commands to manage civilian personnel by dollars and FTEs in FY20 Guidance. The Marine Corps is also implementing an improved Strategic Workforce Planning process and systematic platform to facilitate better civilian personnel planning, programming, formulation and execution. This will provide the Marine Corps with an improved methodology to analyze and validate civilian FTE requirements and to inform strategic decisions regarding civilian structure and resource posture across the enterprise. Furthermore, the FY20 Guidance emphasizes greater focus on compliance with the +/- 2% execution variance to include required compensation management plans to describe actions being taken to ensure execution falls within budgetary limits by the end of the fiscal year for those major subordinate commands that are executing outside of the prescribed range.

RECOMMENDATION 2: The GAO recommends that the Secretary of Navy should ensure that the Commandant of the Marine Corps identifies and reconciles any differences between the Marine Corps’ internal civilian personnel data and the civilian personnel data the Department of the Navy uses to support its annual budget request.

DOD RESPONSE: We concur with the recommendation. The Marine Corps currently requires major subordinate commands to conduct system reconciliation of civilian labor data in the Standard Accounting, Budget, and Reporting System (SABRS – the Marine Corps’ official accounting system for audit and reporting purposes) and the Work Year and Personnel Cost Reporting (WYPC) on a monthly basis to bring balances within a +/- 2% tolerance. Major subordinate commands are also required to provide an explanation of deltas that exist for more than two consecutive reporting periods. Headquarters Marine Corps (HQMC) will be concentrating more on compliance with existing fiscal guidance in FY20. Furthermore, the Marine Corps will also focus on strategic change utilizing the Financial Management Evaluation and Analysis (FMEA) process in which HQMC utilizes an evaluation checklist to review and evaluate financial performance and compliance of major subordinate commands. The civilian labor functional area assessment is currently being reviewed and updated to achieve greater compliance in all aspects of civilian labor planning, programming, formulation, and execution. Trend analysis will be conducted on FY20 FMEA results to identify and provide additional training and guidance to commands with the lowest compliance levels.

Enclosure

Agency Comment Letter

Text of Appendix III: Comments from the Department of Defense

Page 1

October 4, 2019

Mrs. Brenda S. Farrell
Director, Defense Capabilities and Management
U.S. Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Mrs. Farrell:

This is the Department of Defense (DoD) response to the Government Accountability Office (GAO) Draft Report GAO-19-689, "Civilian Personnel: Additional Guidance and Consistent Data Reporting Could Help Improve the Marine Corps' Budget Management," dated September 4, 2019 (GAO Code 103082).

Enclosed are our comments to the GAO recommendations. We appreciate the opportunity to review and comment on the draft audit report.

My point of contact for this audit is Mr. Charles K. Dove, (703) 693-9724 or charles.dove@usmc.mil and HQMCAuditLiaisons@usmc.mil.

Sincerely,

Richard V. Spencer

Enclosure:
As stated

Page 2

**"CIVILIAN PERSONNEL: ADDITIONAL GUIDANCE AND CONSISTENT DATA
REPORTING COULD HELP IMPROVE THE MARINE CORPS' BUDGET
MANAGEMENT"**

DEPARTMENT OF DEFENSE COMMENTS TO THE GAO RECOMMENDATIONS

RECOMMENDATION 1:

The GAO recommends that the Secretary of Navy should ensure that the Commandant of the Marine Corps updates Marine Corps' civilian personnel budget formulation and execution policies to include guidance for the major subordinate commands to manage civilian personnel to full-time equivalents (FTEs).

DOD RESPONSE:

We concur with the recommendation. The Marine Corps has included more emphasis for major subordinate commands to manage civilian personnel by dollars and FTEs in FY20 Guidance. The Marine Corps is also implementing an improved Strategic Workforce Planning process and systematic platform to facilitate better civilian personnel planning, programming, formulation and execution. This will provide the Marine Corps with an improved methodology to analyze and validate civilian FTE requirements and to inform strategic decisions regarding civilian structure and resource posture across the enterprise. Furthermore, the FY20 Guidance emphasizes greater focus on compliance with the +/- 2% execution variance to include required compensation management plans to describe actions being taken to ensure execution falls within budgetary limits by the end of the fiscal year for those major subordinate commands that are executing outside of the prescribed range.

RECOMMENDATION 2:

The GAO recommends that the Secretary of Navy should ensure that the Commandant of the Marine Corps identifies and reconciles any differences between the Marine Corps' internal civilian personnel data and the civilian personnel data the Department of the Navy uses to support its annual budget request.

DOD RESPONSE:

We concur with the recommendation. The Marine Corps currently requires major subordinate commands to conduct system reconciliation of civilian labor data in the Standard Accounting, Budget, and Reporting System (SABRS - the Marine Corps' official accounting system for audit and reporting purposes) and the Work Year and

Personnel Cost Reporting (WYPC) on a monthly basis to bring balances within a +/- 2% tolerance. Major subordinate commands are also required to provide an explanation of deltas that exist for more than two consecutive reporting periods. Headquarters Marine Corps (HQMC) will be concentrating more on compliance with existing fiscal guidance in FY20. Furthermore, the Marine Corps will also focus on strategic change utilizing the Financial Management Evaluation and Analysis (FMEA) process in which HQMC utilizes an evaluation checklist to review and evaluate financial performance and compliance of major subordinate commands. The civilian labor functional area assessment is currently being reviewed and updated to achieve greater compliance in all aspects of civilian labor planning, programming, formulation, and execution.

Trend analysis will be conducted on FY20 FMEA results to identify and provide additional training and guidance to commands with the lowest compliance levels.

Appendix IV: GAO Contacts and Staff Acknowledgments

GAO Contact

Brenda S. Farrell, (202) 512-3604 or farrellb@gao.gov.

Staff Acknowledgments

In addition to the contact named above, Vincent Balloon (Assistant Director), Timothy Carr, Brian Pegram, Clarice Ransom, Aaron Safer-Lichtenstein, Shari Nikoo, Michael Silver, Carter Stevens, John Van Schaik and Gregory Wong made key contributions to this report.

Related GAO Products

Defense Health Care: Additional Assessments Needed to Better Ensure an Efficient Total Workforce. [GAO-19-102](#). (Washington, D.C.: Nov. 27, 2018).

DOD Civilian and Contractor Workforces: Additional Cost Savings Data and Efficiencies Plan Are Needed. [GAO-17-128](#). (Washington, D.C.: Oct. 12, 2016).

Civilian and Contractor Workforces: Complete Information Needed to Assess DOD's Progress for Reductions and Associated Savings. [GAO-16-172](#). (Washington, D.C.: Dec. 23, 2015).

Defense Headquarters: DOD Needs to Reassess Personnel Requirements for the Office of Secretary of Defense, Joint Staff, and Military Service Secretariats. [GAO-15-10](#). (Washington, D.C.: Jan. 21, 2015).

Human Capital: DOD Should Fully Develop Its Civilian Strategic Workforce Plan to Aid Decision Makers. [GAO-14-565](#). (Washington, D.C.: July 9, 2014).

Human Capital: Opportunities Exist to Further Improve DOD's Methodology for Estimating the Costs of Its Workforces. [GAO-13-792](#). (Washington, D.C.: Sept. 25, 2013).

Human Capital: Additional Steps Needed to Help Determine the Right Size and Composition of DOD's Total Workforce. [GAO-13-470](#). (Washington, D.C.: May 29, 2013).

GAO's Mission

The Government Accountability Office, the audit, evaluation, and investigative arm of Congress, exists to support Congress in meeting its constitutional responsibilities and to help improve the performance and accountability of the federal government for the American people. GAO examines the use of public funds; evaluates federal programs and policies; and provides analyses, recommendations, and other assistance to help Congress make informed oversight, policy, and funding decisions. GAO's commitment to good government is reflected in its core values of accountability, integrity, and reliability.

Obtaining Copies of GAO Reports and Testimony

The fastest and easiest way to obtain copies of GAO documents at no cost is through GAO's website (<https://www.gao.gov>). Each weekday afternoon, GAO posts on its website newly released reports, testimony, and correspondence. To have GAO e-mail you a list of newly posted products, go to <https://www.gao.gov> and select "E-mail Updates."

Order by Phone

The price of each GAO publication reflects GAO's actual cost of production and distribution and depends on the number of pages in the publication and whether the publication is printed in color or black and white. Pricing and ordering information is posted on GAO's website, <https://www.gao.gov/ordering.htm>.

Place orders by calling (202) 512-6000, toll free (866) 801-7077, or TDD (202) 512-2537.

Orders may be paid for using American Express, Discover Card, MasterCard, Visa, check, or money order. Call for additional information.

Connect with GAO

Connect with GAO on [Facebook](#), [Flickr](#), [Twitter](#), and [YouTube](#).
Subscribe to our [RSS Feeds](#) or [E-mail Updates](#). Listen to our [Podcasts](#).
Visit GAO on the web at <https://www.gao.gov>.

To Report Fraud, Waste, and Abuse in Federal Programs

Contact FraudNet:

Website: <https://www.gao.gov/fraudnet/fraudnet.htm>

Automated answering system: (800) 424-5454 or (202) 512-7700

Congressional Relations

Orice Williams Brown, Managing Director, WilliamsO@gao.gov, (202) 512-4400,
U.S. Government Accountability Office, 441 G Street NW, Room 7125,
Washington, DC 20548

Public Affairs

Chuck Young, Managing Director, youngc1@gao.gov, (202) 512-4800
U.S. Government Accountability Office, 441 G Street NW, Room 7149
Washington, DC 20548

Strategic Planning and External Liaison

James-Christian Blockwood, Managing Director, spel@gao.gov, (202) 512-4707
U.S. Government Accountability Office, 441 G Street NW, Room 7814,
Washington, DC 20548



Please Print on Recycled Paper.