

Office of Audits, Inspections, and Evaluations



Inflation Reduction Act

FLASH REPORT: THE NATIONAL PARK SERVICE'S INFLATION REDUCTION ACT HIRING EFFORTS AND ACTIVITIES

The Inflation Reduction Act (IRA), Pub. L. No. 117-169, was signed into law on August 16, 2022. Section 50223 of the IRA appropriated \$500 million, available through fiscal year (FY) 2030, for the U.S. Department of the Interior's (DOI's) National Park Service (NPS) to hire employees to serve in units of the National Park System or national historic or national scenic trails. In a July 2023 congressional hearing, NPS reported that it faced challenges related to a declining number of staff over the years, coupled with a substantial increase in park visitation.

Particularly, NPS reported that between FY 2011 and FY 2022, the total number of full-time employees decreased by approximately 3,400 (or 15 percent); in FY 2022 alone, visitation rose 5 percent, from 297 million to 312 million visitors. In a guidance memorandum² for the IRA funding, NPS reported that it recognizes the funding is not a permanent base operating increase for the parks; however, the increase will represent a substantial opportunity to invest in the future of the parks by supporting additional employee capacity at eligible parks.³

We are issuing this flash report to provide information on how NPS plans to (1) use IRA funding to hire employees, (2) report on the status of implementation, and (3) oversee the funding expenditures and hiring. We also provide information on the challenges NPS stated it is facing in implementing the hiring authorized in the IRA.

Definitions

Permanent employees are typically first hired under a career or career-conditional appointment (employment other than temporary, term, or indefinite employment), which requires the appointee to complete a one-year probationary period and a total of three years continuous creditable service to attain a career appointment.

A career seasonal position is a permanent appointment with annually reoccurring and predictable employment periods of at least six months but less than 12 months each year.

A **seasonal** appointment is not expected to last more than 1,040 hours in a year.

A **term** appointment is for a period of more than one year but less than four years.

STEM-related term appointments for science, technology, engineering, and math (STEM) occupations are for a period of more than one year but less than 10 years.

Pathways/interns are hired under the Pathways programs framework, which consists of three separate programs for students and recent graduates: (1) the Internship Program, (2) the Recent Graduates Program, and (3) the Presidential Fellows Program.

A **temporary** appointment is used to fill positions when there is no permanent need for an employee's services.

Source: NPS.

¹ Examining Barriers to Access: Ongoing Visitor Experience Issues at America's Nat'l Parks: Hearing Before the Subcomm. on Oversight and Investigations of the H. Comm. on Nat. Res., 118th Cong. 54 (2023) (statement of Michael T. Reynolds, Deputy Dir. for Cong. and External Rel., Nat'l Park Serv.).

² NPS Memorandum, *REPLY DUE: March 31, 2023: Inflation Reduction Act Hiring Proposals*, dated January 13, 2023.

³According to NPS officials, the IRA stipulates funding is available for National Park System units or national historic or national scenic trails. However, some NPS entities receive funding through NPS' appropriation but are not classified under these categories and are therefore considered ineligible for IRA funding. In addition, in limited instances where parks are currently in the process of becoming National Park System units, those parks are also considered ineligible until they are officially designated as such. Please note that throughout this report, we use the term "eligible parks" to refer to any National Park System units or national historic or national scenic trails eligible to receive IRA funding.

PS' mission is to preserve the natural and cultural resources and values of the National Park System for the enjoyment, education, and inspiration of this and future generations. The NPS website states that these areas include some of the Nation's most treasured and irreplaceable resources. NPS has 7 legacy regions⁴ that manage 429 individual units—commonly referred to as "parks"—covering more than 85 million acres in all 50 States, the District of Columbia, and U.S. territories (see Figure 1). These units include national parks, national historic sites and trails, national monuments, and national scenic trails.



Figure 1: Map of Legacy NPS Regions

According to NPS officials, the Washington Support Office (WASO) provides the central management for national programs, policy, and budget. NPS explained that WASO's leadership includes the NPS Director and three deputy directors: one for operations, one for congressional and external relations, and one for management and administration. These deputy directors are supported by a comptroller, associate directors, and assistant directors. Officials under the WASO Deputy Director for Management and Administration are responsible for allocating and overseeing IRA funding and hiring employees. NPS officials further stated that the seven regional directors responsible for managing the park units in their respective regions report to the Deputy Director for Operations; however, those regional directors are not considered part of WASO. Figure 2 on the next page shows NPS' organizational structure relevant to our report scope.

⁴ In 2018, DOI reorganized to 12 unified regions. According to an NPS official, NPS is using the legacy regional structure to track IRA funding expenditures and hiring. NPS' legacy regions are as follows: Alaska, Intermountain, Midwest, National Capital, Northeast, Pacific West, and Southeast.

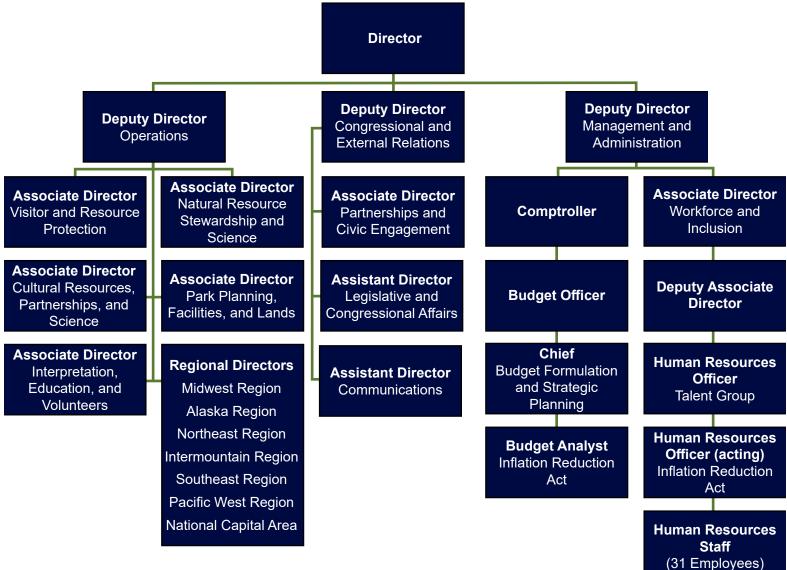


NPS' approximately 20,000 employees serve in a variety of roles—including budget and finance personnel, engineers, community assistance specialists, park rangers and guides, archaeologists, wildlife biologists, maintenance workers, and firefighters—to fulfill NPS' mission. NPS has five functional areas under which it manages its park areas:

- **Resource Stewardship** encompasses resource management operations that provide for the protection and conservation of the National Park System's unique natural, cultural, and historical features.
- Visitor Services includes educational and interpretive programs to enhance the

- visitor's experience. It also supports efficient management of commercial services to benefit visitors and protect resources.
- Park Protection includes law enforcement programs, the U.S. Park Police, and public health operations, which provide for the protection of park resources, visitors, and staff.
- **Facility Operations and Maintenance** encompasses the operations and maintenance of buildings, other facilities, and lands, and the protection of other Government investments.
- Park Support covers the management, supervision, and administrative operations for parks, servicewide programs, and partnerships.

Figure 2: NPS Organizational Structure





IRA Allocation and Hiring Approach

ccording to NPS, after the Office of Management and Budget approved NPS' initial spend plan and apportioned IRA funds in November 2022, NPS issued guidance for allocating the \$500 million enacted in the IRA to hire employees at eligible parks. That guidance described the approach for implementation and included guidance on eligible and ineligible expenses. NPS officials under the WASO Deputy Director for Management and Administration are responsible for allocating and overseeing IRA funding and hiring employees.

Allocation of IRA Funds to Eligible Parks

Of the \$500 million, NPS reserved approximately \$29 million for a Director's priority fund to address emerging priorities, such as providing staffing to newly eligible parks. NPS reserved \$19 million to hire U.S. Park Police officers, and according to NPS officials, these officers will serve the National Park System units in New York City, San Francisco, and Washington, DC. With the expected hiring surge, NPS also reserved \$11 million to establish a dedicated human resources team to support all IRA hiring and onboarding. Per NPS officials, the team consists of 32 positions that include human resources staff who perform hiring and onboarding; dedicated security specialists who perform background checks; and quality control specialists who review the work of the human resources staff. Additionally, NPS officials told us they hired recruiters who perform outreach and use recruiting and networking sites to engage diverse groups.

NPS made 376 allocations from the remaining \$441 million in IRA funding to all eligible parks. The allocation was largely based on each park's share of the FY 2022 appropriation to operate the National Park System. NPS' initial IRA allocations to eligible parks were as follows:

 Larger parks—such as Yellowstone, Grand Canyon, Denali, and Glacier Park—each received an allocation of approximately \$5 million.

- Smaller parks—such as White Sands, Arches, and the Great Sand Dunes—each received an allocation of less than \$1 million.
- Many of the national historic sites, national scenic trails, and national monuments received allocations of \$500,000.

Figure 3 details how NPS allocated the \$500 million in IRA funding.

Figure 3: NPS IRA Funding Allocation

Allocation Description	Allocation Amount		
Director's Priority Fund	\$29,000,0000		
U.S. Park Police	\$19,000,000		
IRA Human Resources Team	\$11,000,000		
Eligible Parks	\$441,000,000		
Total	\$500,000,000		

IRA Hiring Approach

In January 2023, NPS requested all eligible parks to submit by March 31, 2023, proposals for how they planned to spend their IRA funding allocations. NPS required the proposals to include a description, justification, and planned duration for the position, as well as a detailed summary of the eligible planned expenses, such as salaries, relocation costs, travel, training, supplies, and equipment. Generally, NPS provided guidance that IRA funds should be used for new positions. Shifting or extending an existing employee, lateral reassignments, temporary promotions, and increasing the grade of existing positions are not allowable uses of IRA funds. NPS provided no specific requirements for which positions must or may be hired; however, given the one-time nature of the funds, NPS directed that the proposals should support positions that will have a legacy impact beyond the timeframe of the IRA. For example, Denali National Park and Preserve submitted a proposal to hire a term position to transition its paper records to electronic records, which would improve, streamline, and modernize its records management and provide benefits beyond FY 2030.



IRA Allocation and Hiring Approach

NPS also required that the proposals for permanent positions include a post-IRA funding strategy for how the park planned to absorb the additional staffing and responsibilities within its existing budget once the IRA funding expires, such as through expected attrition within the park's existing organization, workforce restructuring, or other strategies. For example, the Santa Monica Mountains National Recreation Area proposed hiring two permanent park ranger positions to assist with general ranger duties that would allow time for senior staff to focus on implementing a leasing program for commercial filming and events. Specifically, the park's post-IRA plan was to absorb the positions into its permanent operation with the anticipation that the short-term leasing program would generate \$1 million within five years.

According to the NPS Comptroller, parks submitted proposals through NPS' existing internal Project Management Information System (PMIS).⁵ See Figure 4 for additional details on the proposal approval process.

Figure 4: NPS IRA Hiring Proposal Approval Process

Park submits proposal to regional office via PMIS

Regional office reviews submissions from its parks and sends to IRA Budget Analyst via PMIS

IRA Budget Analyst reviews all submissions and sends a list of projects to the associate or assistant directors

Associate/assistant directors review and send to deputy directors

Deputy directors review and provide final approval

Per NPS' data, between April 2023 and May 2024, NPS approved or was in the process⁶ of approving 1,243 proposals to hire 1,418 employees, accounting for almost all the \$500 million in IRA funding.

Approved positions included administrative assistants, arborists, biologists, cultural resource specialists, information technology specialists, maintenance workers, and park rangers. Term appointments represented about half of the 1,418 positions, with the other half representing permanent, career-seasonal, seasonal, and Pathways/interns (see Figure 5).

Figure 5: NPS Approved Positions by Appointment Type

Appointment Type*	No. of Positions
Term	707
Permanent	313
Career Seasonal	181
Seasonal	177
Pathways/Interns	23
TBD/Other [†]	7
Temporary	6
Term (STEM-Related)	4
Total	1,418

- * See "Definitions" section on p. 1 for appointment type details.
- † Undesignated appointments and a unique 10-year term appointment.

⁵ PMIS is a servicewide intranet application within NPS to manage information about requests for project funding. It enables parks and NPS offices to submit project proposals to be reviewed, approved, and prioritized at park units, regional directorates, and WASO.

⁶ As of May 31, 2024, there were 21 proposals in the review process.



Spending and Hiring Status

ccording to NPS data as of May 31, 2024, it spent approximately \$21 million of the \$500 million in IRA funding and has onboarded 447 of the 1,418 employees that it planned to hire (see Figure 6).

NPS' Comptroller and IRA Budget Analyst told us that NPS took more than six months to stand up a fully functioning IRA human resources team. According to the IRA Human Resources Officer, NPS began hiring for the team in March 2023 and hired the last team member in October 2023. Consequently, as the IRA Human Resources Officer explained, NPS did not have a fully staffed team until the beginning of FY 2024. NPS officials stated that approximately 78 percent of the employees on the team were new to NPS and needed training and time to develop an understanding of NPS' structure and organization.

The IRA Human Resources Officer noted that all human resources specialists and supervisory human resources specialists were required to obtain and maintain a Delegated Examining Certification⁷ from the U.S. Office of Personnel Management to be able to announce and fill delegated examining positions independently. The IRA Human Resources Officer added that the course and the test for the certification are "difficult" as there is a general 60-percent failure rate for test takers.

Now that the IRA human resources team is fully operational, NPS expects to increase IRA spending as positions are filled. Specifically, NPS reported that it had more than doubled its expenditures from the first quarter to the second quarter of FY 2024.

Figure 6: Status of IRA Spending and Hiring as of May 31, 2024

Legacy Region/Office	Allocated	Spent	No. Planned Hires	No. Onboard	Percent* Onboard (%)
Intermountain	\$92,735,000	\$2,939,050	267	89	33
Northeast	\$89,560,000	\$2,101,302	342	86	25
Pacific West	\$85,685,000	\$1,572,111	169	39	23
Southeast	\$70,125,000	\$1,457,685	234	48	21
WASO	\$58,845,000	\$10,757,082	79	79	100
Midwest	\$52,475,000	\$1,820,085	172	70	41
National Capital Area	\$33,145,000	\$377,793	111	18	16
Alaska	\$17,430,000	\$428,288	44	18	41
Totals	\$500,000,000	\$21,453,396	1,418	447	32%

^{*} Percent of planned positions hired.

⁷ Delegated examining authority is an authority that the U.S. Office of Personnel Management delegates to agencies to fill competitive service jobs through a competitive process open to all U.S. citizens. The Office of Personnel Management requires agencies to ensure that individuals responsible for conducting such activities have completed certification requirements.



Funding and Hiring Oversight

uring our review, we learned that an NPS IRA Budget Analyst oversees the IRA expenditures to ensure that the charges are appropriate. Specifically, according to the Budget Analyst, each pay period, this official:

- 1. Performs analytics on the payroll data to ensure only approved IRA position salaries are charged to IRA funds.
- 2. Performs analytics to ensure that salaries are not prematurely charged to IRA funds by comparing employees' salaries to their hire dates.
- 3. Verifies at a high level a sample of non-salary expenses—such as relocation costs, supplies, and equipment—to ensure the charges align with those approved in the proposals. For example, one employee's non-salary expenses totaled approximately \$33,000; in this instance, the official compared the expenses to the approved proposal and determined the charges were reasonable because the proposal included a budgeted cost of \$30,000 for leased housing.

Additionally, NPS maintains a spreadsheet containing each approved IRA position and its status as part of NPS' hiring progress oversight. Specifically, the spreadsheet contains a "status" column that allows management and human resources to determine the status of all 1,418 positions, including whether the position has been announced, if a tentative offer has been sent, if the selectee is waiting for a security clearance, or whether the new hire has been onboarded. According to NPS' IRA Human Resources Officer, the human resources specialists and assistants update this spreadsheet daily.





NPS Challenges and Risks

Ithough NPS officials stated that they expect to fully expend the IRA funding by FY 2030, NPS' IRA Budget Analyst told us that the biggest challenge NPS faces is hiring employees quickly without being provided the option to use hiring flexibilities. According to the IRA Budget Analyst, the IRA did not provide NPS those flexibilities; and without them, NPS has relied on its existing hiring authorities. The IRA Human Resources Officer estimated it will take several months to a year to onboard the bulk of the remaining vacancies approved to date using those authorities. The IRA Human Resources Officer further stated that the process takes longer if the employee is relocating.

NPS' IRA Human Resources Officer also detailed other challenges when filling positions. For example, even when announcements are open for as long as a month, NPS may receive only a few applications. If none of those applicants are qualified, NPS must reannounce the position and start the hiring process again. In some cases, parks have needed to reconsider and update the type of position or the grade level to get a qualified applicant pool to fill the position, which adds to the amount of time it takes to hire an employee.

In addition, in a May 2024 congressional hearing,⁹ NPS Associate Director of Planning, Facilities, and Lands stated that recruiting is a challenge, particularly in areas where NPS does not have the housing for new employees moving to the community. He also stated that "every [park] superintendent I talk to about housing reminds me that housing is an important part of recruitment." According to Yellowstone National Park officials, employee housing is an overarching challenge for NPS because a park's ability to attract and retain talent is strongly tied to the availability of affordable private and Government housing options.

Given the challenges NPS faces with hiring and filling a large number of positions, there is a potential risk that NPS may not fully execute its hiring plans on time before funds expire.

 ⁸ For example, NPS officials told us that the Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, 135 Stat. 429 (2021), allowed the U.S. Department of Energy to recruit and directly appoint highly qualified individuals into competitive service.

⁹ Hearing to Examine the President's Budget Request for the Nat'l Park Serv. for Fiscal Year 2025 and to Receive Testimony on Pending Legislation: Hearing Before the Subcomm. on Nat'l Parks of the S. Comm. on Energy and Nat. Res., 118th Cong. (2024).



Scope and Methodology

We conducted our inspection in accordance with the *Quality of Standards for Inspection and Evaluation* as put forth by the Council of the Inspectors General on Integrity and Efficiency. To accomplish our objectives, we obtained background information on NPS, gathered documentation related to IRA-funded hiring and spending, and discussed details with NPS officials to determine how NPS plans to spend funds and manage oversight. We gathered the information in this flash report directly from NPS or from publicly available sources.

LOOKING AHEAD

Our future oversight efforts of NPS hiring activities related to the IRA may include the following:

- Monitoring NPS' IRA spending and hiring progress.
- Reviewing proposals and related expenditures to ensure compliance with the IRA and NPS guidance.
- Reviewing NPS' IRA hiring practices to ensure compliance with applicable hiring laws, regulations, policies, and procedures.

Photo Sources

- p. 1: aheflin/stock.adobe.com, p. 2: NPS, p. 7: digidreamgrafix/stock.adobe.com,
- p. 8: sunsinger/stock.adobe.com, p. 9: Mindscape studio/shutterstock.com.



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