

# SUPPLEMENT TO AGPMR ADVISORY 14-01

## Space Utilization Rate Exception Guidance

### 1. INTRODUCTION

The Department's 150 "all in" UR is always the standard to be met whenever possible. However, it is recognized that there may be occasions when meeting the UR is not practically feasible. Reasons may include the cost to reconfigure and fit out smaller space, compliance would hinder fulfillment of the Agency's mission/program, or it is not physically achievable (e.g. a load-bearing wall cannot be removed or the building has an inefficient shape).

The ASD Director (or equivalent) - or the Director, Office of Operations for NCR space - is responsible for evaluating and approving any Exception to the UR. An Exception may only be granted on a temporary basis and only after space reduction efforts – like occupying open concept space and teleworking - have been considered and implemented to the maximum extent possible.

**A copy of all signed Exception memoranda must be submitted to Paul Walden, Chief, Property Management Division (PMD), OPPM, within 30 calendar days after signature.** The scanned copy may be emailed to: [Paul.Walden@dm.usda.gov](mailto:Paul.Walden@dm.usda.gov). A copy of the Exception approval memorandum must also be included in the lease or project file.

### 2. EXCEPTION ELEMENTS

An Exception approval package should include the following elements:

**SITUATION:** Describe whether the space is a direct USDA lease, USDA owned property, or a GSA space assignment.

**ACTIVITY:** Describe the space-related action that is prompting the UR review for implementation. For example, a direct leasing action (specify type of action), owned building acquisition or a new GSA Occupancy Agreement (OA).

**IDENTIFICATION #:** Provide the applicable identification number for the Lease or OA, and Real Property Unique Identification (RPUID) number from USDA's Corporate Property Automated Information System (CPAIS).

**CURRENT UR:** Provide the office's current UR.

**PROPOSED UR:** Provide the office's proposed UR.

**JUSTIFICATION:** If the proposed UR is expected to exceed 150 “all in” Usable SF/person on average, explain why meeting the UR is not feasible for the proposed activity. Include details and supporting documentation like:

- Floor plan – existing and proposed conceptual space layouts, if available.
- Reasons UR target threshold cannot be met. Examples:
  - Cost-prohibitive to make physical changes (e.g. relocate walls and/or install new furniture);
  - Negative impact on ability to provide customer service (e.g. large counter space/reception area required due to high-traffic office);
  - Conflicts with other Departmental requirements (e.g. information technology space specifications or on-site file storage). Provide a copy of such requirements or reference;
  - Structural limitations of the building, such as shape or column spacing, that preclude downsizing. This includes leaving a portion of the building unmarketable to the owner or Lessor;
  - Other unique requirements, such as a mission requirement for a specific location.

**FUTURE IMPLEMENTATION PLAN:** Describe how the Agency plans to fully implement the 150 “all in” UR in the future, and approximately when this is expected to be achieved. Example: when a new lease is solicited and it is cost-effective for the office to relocate and downsize, or space becomes available that better accommodates a more efficient, open concept layout.

### 3. COLLOCATED OFFICES

**In collocated situations, each Agency’s ASD Director or equivalent must sign an Exception for their respective space.** This can be accomplished either by using a single Exception memorandum signed by all, or separate memoranda for each Agency that are consolidated and presented to PMD as a package. Shared space is prorated to each Agency based on the percentage of dedicated space occupied by each organization. The lead Agency is responsible for submitting the Exception memo(s) to PMD.

### 4. SAMPLE

The following is sample Exception memorandum language appropriate for a lease procurement that involves a single USDA agency. The Agency is lowering its UR, but still exceeds the Policy. The memorandum can be modified to fit other situations as needed. Reasons listed for requesting an Exception are not sanctioned or required, and are only provided as potential examples. Yellow background items are place holders for information that is to be provided on a case-by-case basis.

“An Exception is hereby granted to the 150 “all in” UR threshold prescribed by AGPMR Advisory 15-05, titled “Space Utilization Rate Policy.”

The present USDA lease (lease #) for the building located at (address) expires on (date). The RPUID for this location is (RPUID #). (Agency Name) is the sole USDA occupant. The current amount of office space is (#) Usable SF (USF). The number of personnel housed at this location is (provide # according to the Advisory definitions). Therefore, the UR is (#) USF/person. See attached floor plan for the distribution of space. This exceeds the 150 “all in” UR by (#) USF.

(#) USF of space is being sought under a new lease using full and open competition procurement methods. See attached draft conceptual floor plan. A slight space reduction is considered to be achievable because of an increase in open space (elimination of (#) private offices) and reduction in the amount of support space used for meetings, duplicating activities, mail sorting, and supply storage. However, these measures will only lower the UR to (#), which still exceeds the maximum threshold.

The decision to grant an Exception to the UR policy for this office is based on a determination that additional strategies to lower the UR are not feasible at the present time. Reasons include:

- Increasing the amount of open concept space is cost-prohibitive due to a lack of suitable furniture, and would not be conducive to office work patterns, which require closed quarters to work on projects involving confidential information;
- The office lacks the necessary technology and equipment for employees to telework at home, which reduces opportunities for desk sharing or hoteling;
- Reducing the SF occupied to meet the 150 “all in” UR would negatively impact the ability to provide critical services and programs to the public. It would not provide adequate room for a reception area with a counter, for confidential client meeting space, as well as for files that must be retained on site according to the Office of the General Counsel. A copy of the legal requirement is attached;
- Automated Data Processing room requirements specified in Departmental Regulation (DR) 3901-001 constitute additional non-discretionary space. A copy of the pertinent portion of the DR is attached.

Therefore, this office’s UR of (#) SF/person is approved. This decision will be reviewed again when the lease expires in approximately (X) years. Meanwhile, if conditions change and it becomes feasible, this office is instructed to take action to lower the UR at the earliest practical opportunity, and to notify me.

Questions related to this Exception may be directed to (contact name and information.)”

Signed by (ASD Director Name) on (Date)

Attachments

cc: Paul Walden, OPPM/PMD