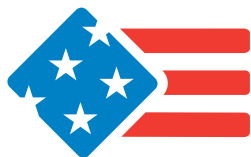


IPA Agency and Candidate Guidebook

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PARTNERSHIP
FOR PUBLIC SERVICE

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Introduction

From 2021-2023, the Partnership for Public Service created a program to help agencies temporarily hire private sector subject matter experts onto their team using a federal hiring authority known as an Intergovernmental Personnel Act, or IPA, agreement. Throughout the course of the program, the Partnership developed a body of knowledge regarding the hiring authority itself, mechanisms for using that hiring authority, and advice for candidates and agencies establishing an employment agreement through the hiring authority.

What follows is a summarization of the knowledge collected by the Partnership. Due to the nature of the Partnership's program, standard guidebook entries explain IPA agreements which place a candidate from a non-federal institution into a federal agency. For parties interested in placing federal employees into eligible private sector institutions, the guidebook will separately outline processes for 'reverse IPAs'.

The Partnership encourages parties establishing an IPA agreement to consult with their respective hiring teams while navigating the employment process, and to use this guidebook as a supplemental resource along the way.

The Basics of IPA Agreements

History

The Intergovernmental Personnel Act (IPA) of 1970 created a talent exchange designed to increase partnerships between federal and state/local governments. The exchange is authorized under 5 U.S.C. Sections 3371-3376, and is described in detail in the Code of Federal Regulations, part 5, Chapter 334¹.

By definition, “An IPA agreement is a temporary assignment of personnel between the Federal Government and State and local governments, institutions of higher education, Indian tribal governments, and other eligible organizations” (including nonprofits, federally funded Research and Development centers, hospitals, schools, research institutes, and scientific societies.”² The authority allows for federal employees to go to the designated sectors (reverse IPAs) as well as for the federal government to temporarily employ individuals from those sectors.

Though the program was designed in 1970 to facilitate talent exchange between federal and state/local governments, by 1975 most agencies were using the authority to bring in talent from the academic and non-profit sectors.

Benefits of Hiring IPAs

For Agencies:

- Temporarily expand capacity for mission critical projects and initiatives, especially those requiring timely implementation.
- Bring in top-level talent with specialty skills that can bolster existing efforts or initiate new projects.
- Improve deliverable quality by incorporating diverse perspectives from outside of government.

For Employees:

- Make a longstanding impact across the nation without leaving one’s current field or maneuvering a long-term career change.
- Understand existing research and career efforts through the lens of the federal government.
- Expand one’s professional network and develop career skills in a new context.

¹ Institute for Defense Analysis (IDA) Science & Technology Policy Institute, [Federal Personnel Exchange Mechanisms](#), 2013, p. 7

² Government Accountability Office (GAO) Report GGD-89-33, Intergovernmental Personnel Act of 1970: Intergovernmental Purpose No Longer Emphasized, 1989, p. 1

IPA Candidate Considerations

Finding Candidates

Traditionally, an agency seeking an IPA placement and an individual interested in serving as an IPA must leverage their personal networks to find each other, create an IPA agreement, and navigate the hiring and onboarding process. See Appendix C for information about conducting this process in collaboration with a philanthropic foundation.

1. Who is responsible for seeking, finding, recruiting, interviewing, and eventually hiring IPA candidates?
 - a. Each individual agency is responsible for completing these tasks.
 - i. Depending on the agency, certain offices may be responsible for different components of the hiring process. See the **Hiring Flowchart** for more details.
 - b. The Office of Personnel Management (OPM) does not manage the agency's IPA process, but it does maintain oversight of agencies' use of the IPA program.
2. How long can an IPA placement last?
 - a. An IPA placement can last from six months up to two years, with the option to extend the placement for an additional two years.
 - b. An individual cannot serve in the same IPA role for longer than 4 years.
3. Do hiring managers need to post this position on USAJobs?
 - a. No – since candidates are hired through a memorandum of understanding, agencies cannot and should not post IPA placement opportunities on USAJobs.
4. How can hiring managers recruit candidates?
 - a. Leverage existing networks – Outline a position description and share the role with subject matter experts in your field of expertise.
 - b. Conduct cold outreach – Identify individuals or organizations whose work would benefit your team. Once identified, contact these individuals or organizations directly by phone or email.
 - c. Use social media and job boards – With leadership's and HR's permission, publicize the IPA opening on LinkedIn, Twitter, Facebook, ProFellow, and other job boards.
 - d. *Note – before publicizing the IPA opening, ensure there is an application system or resume drop already in place for candidates.
5. What types of candidates are eligible to participate?
 - a. Candidates hired through an IPA agreement must be primarily employed by a certifiable home institution (see next section) for at least 90 days prior to the start date of their employment at a federal agency.
 - b. Candidates should expect to return to their employer at the conclusion of their IPA placement – any change in employer during the IPA agreement establishment and execution process will result in the need to create an entirely new IPA agreement.

Interacting with Home Institutions

IPA agreements are designed to facilitate the exchange of talent between the federal government and several specific, non-federal organizations, hereby referred to as 'home institutions.' Home institutions must be certified by an agency to send their employees to serve as IPA candidates.

1. With whom can an agency interact to create a personnel exchange? In other words, what types of non-federal organizations can be certified?

- a. State and local governments
 - b. Institutions of higher education
 - c. Indian tribal governments
 - d. Other eligible organizations: non-profits³, federally funded research and development centers, hospitals, schools, think tanks, research institutes, and scientific societies.
2. How does an agency confirm that the home institution is certified to participate in this talent exchange?
 - a. Every agency is responsible for certifying the eligibility of the home institution.
 - b. If an organization has already been certified by an agency, this certification is permanent and may apply throughout the federal government.⁴
 - c. Federal agencies are allowed to accept a home institution's certification by another federal agency. If this is done, no additional certification is necessary.
 3. How long are these certifications valid?
 - a. Home institution certifications are permanent and may apply throughout the Federal Government depending on the parameters established by other federal agencies.
 4. Is the Office of Personnel Management (OPM) involved in the certification process?
 - a. OPM does not manage an agency's institution certification process.
 5. Can I find existing lists of certified home institutions?
 - a. Some agencies publish their list of certified organizations publicly, such as:
 - i. [U.S. Department of Agriculture](#)
 - ii. [General Services Administration \(page 5\)](#)
 - b. Some agencies' HR offices may also maintain their own list of home institutions. Federal hiring managers can request that list.

Certifying a Home Institution

6. What criteria do organizations need to meet to be certified?
 - a. Requests for certification should include a copy of the organization's:
 - i. "Articles of incorporation,
 - ii. Bylaws,
 - iii. Internal Revenue Service (IRS) letter of nonprofit status, and
 - iv. Any other information describing the organization's activities as they relate to the public management concerns of governments or universities."⁵
 - b. Agencies are responsible for developing any additional agency-specific characteristics by which they measure the objectives of the home institutions and the degree to which the IPA is of sound public purpose.
7. To whom do candidates need to provide certification documentation?
 - a. Candidates must submit all documents to their federal hiring manager, who must then submit them to their Human Resources office for approval.
8. Can an organization be certified if they do not have a candidate being hired for an IPA?
 - a. No, organizations cannot be preemptively certified. They must have a candidate going through the IPA hiring process to be certified.

³ Must be a registered 501(c)3 organization.

⁴ General Services Administration (GSA) Office of Evaluation Services, Internal Guide for IPAs, 2020, p. 2

⁵ Office of Personnel Management Hiring Information, [Revised Intergovernmental Personnel Act – Provisions](#)

Hiring Structure and Employment Rights

IPA candidates are classified by the agreement between the Federal and non-Federal organization. Federal employees, when employed at a non-federal institution through a ‘reverse IPA,’ always retain the rights and ethical regulations of traditional federal employees. Non-Federal employees who are appointed are considered federal employees, whereas non-Federal employees employed through a detail are not considered to be federal employees and are thus bound by different and more specific rights and ethical concerns. Most non-Federal IPA candidates are detailed to their placement.

1. Are IPA candidates employed by their sending institution or destination institution?
 - a. Federal employees that work for an external organization (aka ‘reverse IPAs’) as part of a detail are still considered full-time federal employees.
 - b. Federal employees that work for an external organization (aka ‘reverse IPAs’) as part of a sabbatical are considered on leave without pay and are thus employed full-time by their destination institution.
 - c. Non-Federal employees employed through *an appointment* are temporarily considered full-time federal employees.
 - d. Non-Federal employees employed through *a detail* remain full-time employees of their non-Federal institution.
2. What restrictions must Federal employees working for external organizations (aka ‘reverse IPAs’) respect?
 - a. Broadly, reverse IPAs retain federal health and compensation benefits but must also respect the federal ethics code. *See 5 U.S.C. Section 3373 for more details.*
3. What restrictions must *appointed* non-Federal employees respect?
 - a. Rights: Employee is subject to all restrictions and receives all the rights of a traditionally employed public servant.
 - b. Work Access: Since individuals on IPA appointment “... [have] no restrictions on the positions that they can fill. They can make financial decisions and have unfettered access to information.”⁶
4. What restrictions must *detailed* non-Federal employees respect?
 - a. Rights: Though individuals technically remain employees of their former organization, the employee is still subject to federal ethics codes. The individual may be recognized through letters of appreciation or commendation. They are not eligible for awards granted under the incentive awards programs governed by 5 U.S.C. Chapter 45.
 - b. Work Access: Detailees “cannot sign documents, administer line-management delegated authorities, or issue grants or policies.”⁷ They may not exercise supervision over federal employees.
5. Does hiring structure affect access to healthcare benefits?
 - a. Not necessarily – most home institutions and federal agencies elect for the candidate to maintain their existing healthcare coverage regardless of hiring structure. Candidates who are appointed may have access to more expansive federal benefits – hiring managers and candidates should discuss healthcare coverage during conversations about pay structure.

⁶ Institute for Defense Analysis (IDA) Science & Technology Policy Institute, [Federal Personnel Exchange Mechanisms](#), 2013, p. 7

⁷ Institute for Defense Analysis (IDA) Science & Technology Policy Institute, [Federal Personnel Exchange Mechanisms](#), 2013, p. 7

Pay Structure

IPA employees are paid through cost-sharing agreements between the non-Federal home institution and Federal agency. The Federal agency may pay all, some, or none of the costs of an IPA placement’s salary. Costs not covered by an agency are covered by the non-Federal organization, and vice versa. The structure of the agreement should be delineated during the negotiation of the IPA candidate’s placement. Payment structures are intended to mirror the traditional General Schedule (GS) pay grades, but most agreements are complicated by factors like IPA detail status, security clearance needs, location, etc.

The Basics

1. Who pays the salary of an IPA employee?
 - a. This depends on the cost-sharing agreement the agency and home institution have signed.
 - b. In theory, the cost distribution will be based on the extent to which the home institution benefits from the assignment, with the larger share of costs borne by the organization which benefits most from the assignment.
2. Who determines which party benefits the most from the assignment?
 - a. The initiating party, in most instances, is requesting an IPA exchange to benefit itself, and therefore it is assumed that the requesting party benefits the most, all other considerations being equal.
 - b. Some agencies have designated formulas to calculate the benefit of the assignment and associated cost-sharing responsibilities.
3. Are cost-sharing agreements reimbursable or non-reimbursable?
 - a. ‘Reimbursement’ refers to the process through which a federal agency contributes to, or reimburses, a home institution for the cost of the IPA candidate’s salary.
 - b. Reimbursement standards should be established in the IPA agreement. Agencies may choose to enter into either type of agreement.

Who pays (Pay Structure)	Reimbursable	Non-reimbursable
Federal agency covers all costs	X	
Home institution covers all costs		X
Federal agency and home institution split costs	X	
Philanthropic foundation covers some or all costs ⁸		X

- c. Non-reimbursable agreements are exceptionally rare. Consult with the budget office when establishing a reimbursable agreement to discuss reimbursement structures and payment timelines.
4. Are travel expenses covered within the bounds of the IPA agreement?
 - a. Travel expenses are entirely negotiable between the parties, along with relocation, pay and benefits arrangements.

⁸ See Appendix C for more details about philanthropic funding support for IPA placements.

Non-federal employee from a home institution to a temporary federal employee

EMPLOYED THROUGH APPOINTMENT

1. How are non-Federal IPA appointees paid?
 - Non-Federal IPA appointees are considered full-time federal employees and are compensated at a federal pay grade commensurate with their locality and duties of assignment.
 - Federal agencies are responsible for paying IPA appointees, either through a reimbursable or non-reimbursable agreement.
2. Are non-Federal IPA appointees able to enroll in federal health benefits?
 - Yes. Non-Federal IPA appointees can enroll in federal health benefits programs, group life insurance, and retirement plans.
 - Note that non-Federal IPA appointees are not required to enroll in federal health benefits and may still retain their non-federal insurance coverage.
3. Can non-Federal IPA appointees receive monetary awards?
 - Yes. Since non-Federal IPA appointees are temporarily considered full-time federal employees, they are eligible for awards granted under the incentive awards programs governed by 5 U.S.C. Chapter 45. .

EMPLOYED THROUGH A DETAIL

1. How are non-Federal IPA detailees paid?
 - Detailed IPA employees remain employees of their permanent organizations. Their pay is the responsibility of the home institution. Payment is complicated by the classified or unclassified nature of the IPA candidate's detail assignment (see question 2).
2. What are two options for determining correct salary of a non-Federal detailee?
 - Assigned by detail to a federally classified position: The Federal entity can reimburse the contributing organization for any Federal salary owed to the detailee, above the detailee's normal salary; it can also pay the difference to the detailee directly. This is determined by the agreement between the home organization and federal agency.⁹
 - Assigned by detail to a set of unclassified duties: These employees continue to be paid directly by the non-federal organization at a "rate of pay based on the assignee's non-federal job."¹⁰
 - The federal agency can agree to reimburse the home institution for all, some, or none of the costs of the IPA assignment.
3. Are non-Federal IPA detailees able to enroll in federal health benefits?
 - No. They are unable to enroll in federal health benefits programs, group life insurance, or retirement plans.
 - Non-Federal IPA detailees must work with their home institution to ensure that they remain enrolled in their current insurance plan.
4. How does private consulting impact the non-Federal IPA detailee's pay?
 - "Agencies may consider the income from certain private consulting work as part of the academic pay of university employees. Specifically, when the regular tour of duty for a university employee includes an allotment of time for consulting, or when the employee is performing any job-related consulting that cannot be continued during the assignment, the income received from the consulting may be regarded as part of the employee's academic pay."¹¹
 - Thus, the agency may choose to cover the lost consulting revenue under the presumption that otherwise, their salary from their university would be less than the 'appropriate rate of pay' warranted by Federal duties.

⁹ Office of Personnel Management (OPM) Hiring Information, [Revised Intergovernmental Personnel Act – Assignment](#)

¹⁰ Ibid

¹¹ OPM Hiring Information, [Revised Intergovernmental Personnel Act – Provisions](#)

- » By paying these consulting fees, the agency may end up effectively paying the IPA a level of pay equal or greater than level V of the Executive Schedule, making that IPA subject to the various post-service restrictions placed on federal senior executives.
- Any potential conflicts of interest brought about by continuing or recently concluded consulting work must be disclosed in accordance with the Federal entity's ethics policy.
- See Appendix for **FAQ on Candidates with Consulting Income** for more information.

Federal employee to home institution ('reverse IPA')

1. What payment options are available for federal employees working at a private sector home institution?
 - a. Those *employed on a detail* are still considered full time federal employees and are paid by their home agency.
 - b. Those *employed while on leave without pay* are paid by their home institution.
2. Can an IPA assignment be linked to federal employee performance?
 - a. Yes. An IPA engagement can be used as a professional development opportunity for a strong performer. Its successful completion (defined specifically at time of assignment) can also be used as a performance goal in order to earn a bonus, quality increase, career ladder promotion or other incentive.
 - b. An IPA assignment is not an opportunity to "remove" a poor performer from the federal workplace for a period of time, and in fact that approach to using the IPA program is antithetical to its purpose.

Creating an IPA Agreement

IPA agreements are drafted as a Memorandum of Understanding (MOU) between the federal agency and the candidate's home institution.

The Office of Personnel Management (OPM) maintains oversight over the Intergovernmental Personnel Act, its use, and the regulations around it. However, individual agencies are responsible for creating IPA agreements with desired candidates, managing the approvals process, and onboarding candidates.

1. What form does an agency typically use to record its IPA agreement?
 - a. Agencies may utilize OPM's Assignment Agreement ([OF-69](#)) form.
 - b. Alternatively, each agency may create their own form to record the agreement. Many agencies, especially those who hire IPAs regularly, have their own version of the OF-69.
 - i. Please check with HR to see if they have their own form on hand.
 - ii. For reference, please review [this example IPA agreement \(page 11\)](#) from the General Services Administration (GSA).
2. Must a federal agency keep the Office of Personnel Management (OPM) informed of the development and execution of an IPA agreement?
 - a. Partially. Though OPM does not manage each agency's IPA program, it does maintain oversight of the agency's use of the IPA. However, there is no requirement to submit finalized IPA agreements to OPM.
 - b. Agencies must maintain accurate records of all IPA assignments as well as eligibility certifications of home institutions.
 - c. "In addition, the Office of Personnel Management's Office of Merit Systems Oversight and Effectiveness may conduct, as appropriate, reviews of agencies' administration of the Intergovernmental Personnel Act program."¹²

¹² OPM Hiring Information, [Revised Intergovernmental Personnel Act – Provisions](#)

How to Get Started – Agencies

Agencies will need to gather some initial information and obtain approvals before beginning the IPA hiring process:

1. Obtain approval for the temporary placement of an IPA for a term of up to 24 months.
 - IPA roles do not require a billet.
2. Create a clearly defined IPA job description that includes:
 - Specific job responsibilities/duties
 - Term length
 - Type of work environment, i.e. in-person, hybrid, fully remote
 - Assign a GS level to the role (even if the federal agency is not providing funding)
 - Security clearance level (if applicable)¹³
 - Tentative start date
3. Determine the amount of funding your agency can provide for the participant’s salary and benefits.
 - Agencies can provide full, partial, or no funding for their IPA placement.
 - Consider base salary as well as travel funds and health insurance costs.

How to Get Started – Candidates

As soon as an agency approaches a candidate regarding an IPA opportunity, that candidate should alert their supervisor to their interest in taking a leave of absence.

Topics of discussion with home institutions can include the following:

- Approval to take part in an IPA placement for a specific term length.
- Whether the home institution can provide any funding towards the IPA.
 - » Note that most funding details will be determined in discussion with the agency. However, it is helpful to understand what funding, if any, may be available.
 - » Best practice is to wait to ask financing questions of the home institution until after the roles and responsibilities of the IPA have been established.
- The benefits of participating in an IPA:
 - » Impact on a national and/or international scale.
 - » First-hand knowledge about how government works to serve the American people.
 - » Career enhancement through a unique professional development experience.
 - » Expand professional networks and develop career skills in a new context.

¹³ Please note that most candidates eligible for IPAs will not have an active security clearance. In the initial approvals stage, agencies should ensure they can obtain a security clearance for their candidate.

Special Case: How to Get Started – Candidates from a College or University

- Collaborate with university office responsible for instructor sabbaticals or research opportunities.
- Assess potential coursework coverage for the duration of the IPA placement. Plan for several semesters of coverage both before and after the proposed timeline of placement.
 - » Inquire with one’s institution about workload or courseload coverage (or course buy outs) during the IPA term as a part of the salary compensation, as applicable.

If candidates have already received approval from their home institution, they should begin gathering the necessary documents needed to certify the institution as IPA eligible (see the Interacting with Home Institutions section on certification requirements).

If a home institution is already certified, candidates and agencies can proceed with the general approvals process detailed below.

Approvals Process

Home Institution Certification

- Begin with this step prior to collecting signatures and processing the OF-69 MOU.
- More information about certification can be found in the **Interacting with Home Institutions** section of this guidebook.
- If the candidate’s home institution is already certified by your agency or you are accepting another agency’s certification, proceed to the next steps below.

Drafting and Signing the OF-69 MOU (or agency-specific MOU)

- [OPM Form 69](#) will serve as the IPA agreement and MOU between the federal agency and the candidate’s home institution.
 - » Double check with HR if your agency has their own version of this form. If they do, use the agency’s version instead.
- As the hiring office drafts the MOU, send members of the HR, finance, and ethics teams a note ahead of time that they will need to process and sign an IPA agreement. Skip this step if your agency has experience processing IPAs.
- Complete all necessary parts of the MOU.
- Have the candidate sign Part 14 and then give the form to the home institution to sign Part 15 under “State/Local Government Agency” even though the organization is a non-profit.
- Once the home institution signs Part 15, the approving official in hiring office can sign the other half of Part 15.

IPA Processing and Approvals

Please note that every federal agency processes and approves IPA agreements differently. The steps outlined below encompass the standard approvals needed, but possibly in a different order than is seen in certain agencies. Some agencies may also require additional paperwork to be completed that is not detailed in this guidebook.

It may be helpful to follow up with Human Resources or any office that works on IPA agreements at your agency to understand the approvals process. For a visual representation of these steps, view the **IPA Can-**

Candidate Hiring Flowchart.

- For each stage of the approvals process, each office providing a signature needs to pass the paperwork to the next office for signature (each office cannot process the MOU simultaneously and sign separate versions of the document). There needs to be only one version being passed from office to office.
- Send the MOU to Human Resources first for approval.
- Have Human Resources pass the MOU to the Finance office next for approval.
 - » Finance may have to contact the candidate’s home institution to arrange the funding reimbursement.
 - » If leadership has any notes about pay frequency or other requirements, let finance know ahead of time or in the MOU itself.
- Have finance pass the MOU to the Ethics office for the final round of approvals.
 - » During the ethics review, it is possible that a candidate may be asked to complete an [OGE Form 450](#), but this will be at the discretion of the ethics team.

IPA Onboarding, Start Date, and Onwards

- Once the MOU is fully approved and finances are sorted, the candidate’s IPA start date can be set.
- Before their start date (either in-person or virtual), make sure the agency has arranged for any equipment, email accounts, and/or access to federal software that they will need to complete their work.

Extending an IPA Agreement

To extend an IPA term, agencies can use the existing MOU and check off the extension box in Part 1 and update the start/end dates. The paperwork will have to go through the approval process again, but it will be faster than the initial approvals.

Concluding an IPA Agreement

At the conclusion of an IPA’s appointment or detail, the non-Federal IPA employee must “return to the non-Federal position occupied prior to the assignment or to one of comparable pay, duties and seniority and that the employee’s rights and benefits will be fully protected.”¹⁴

If an IPA has served in their role for 4 consecutive years, they must return to their home institution for a minimum of 12 months before entering into another IPA agreement.¹⁵

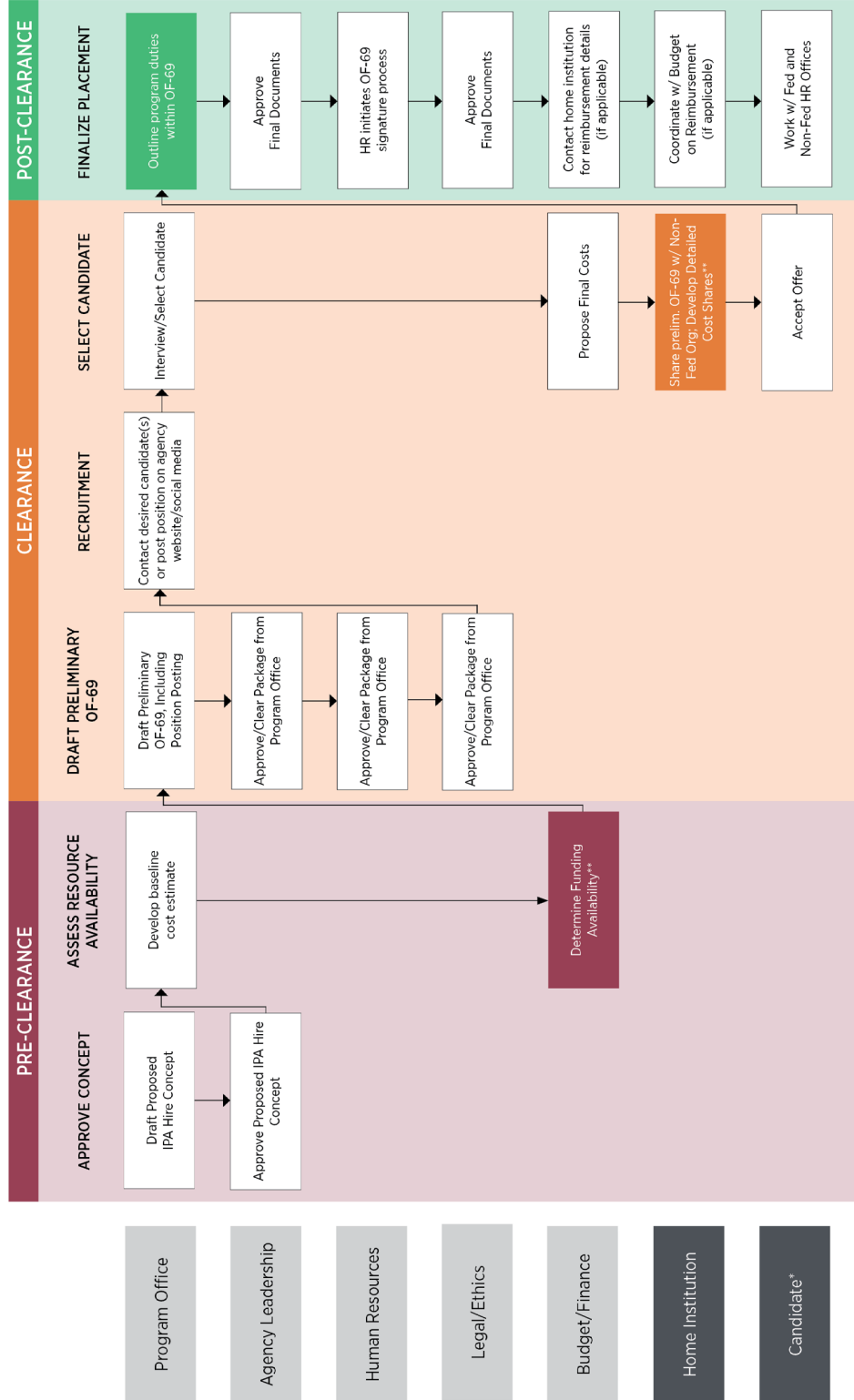
Federal employees serving as an IPA in the private sector (‘reverse IPA’) must return to federal service for a time equal to the length of the assignment. If the federal employee leaves federal service before that time, that person is liable for all expenses (exclusive of salary and benefits) associated with the assignment.

¹⁴ Office of Personnel Management (OPM) Hiring Information, Revised Intergovernmental Personnel Act – Provisions

¹⁵ 5 CFR 334.104(c)

Appendix A: Hiring Flowchart

INTERGOVERNMENTAL PERSONNEL ACT HIRING PROCESS



* These rows represent non-federal stakeholder organizations. They typically collaborate with the federal program or hiring manager to provide input into this process.
 ** For more information about these key decision points, please review the FAQ for Federal IPA Hiring Managers on our website.

Appendix B: FAQs: Ethical Concerns

Given the temporary nature of IPA placements, both IPA employees on assignment and on detail are subject to specific legal concerns regarding their work, their relationship with their home agency or home institution, and their post-IPA opportunities.

Conflict of Interest – Relevant legal guidelines²

Dilemma: I'm detailed to an agency whose work overlaps with my professional research from a funding perspective. Are there any federal regulations of which I should be mindful?

Response: Yes. IPA employees detailed to an agency are subject to the same regulations as federal employees regarding gift giving, misconduct and political activity; financial disclosure and outside earned income limitations; procurement integrity; conflict of interest statutes; political contribution and conversion of property; disclosure of confidential information; and vehicle and aircraft purchase and use. For more details about ethical regulations, see the [Financial Disclosure and Ethics](#) resource developed by the Partnership for incoming federal employees who must acquire a security clearance or fill out a public financial disclosure report.

Conflict of Interest – Academic faculty and research grants³

Dilemma: I'm a prospective IPA employee preparing for a leave of absence from an institution of higher education. I presently serve as the "principal investigator" for a federal grant awarded to my home institution. Can I still manage the grant once I begin work on an IPA detail?

Response: Yes, but IPA detailees are subject to regulations under U.S.C. Title 18 Section 205, which prohibits an employee from personally representing anyone in an agreement with a federal entity. Thus, an IPA employee can prepare the grant application and be listed as a principal investigator, but the grant must also be signed by a co-investigator who is not working for a Federal entity.

Conflict of Interest – Academic faculty and continuing work⁴

Dilemma: I am concluding my detail at a federal agency and recognize the need for additional research on my project. May I recommend my home academic institution for consideration as a recipient of a federal grant to continue the work?

Response: Typically, IPA placements work with their agency's General Counsel office to draft a waiver outlining the ways in which an IPA on detail can participate in matters that generally apply to the financial interests of their home academic institution. Without that waiver, an IPA on detail cannot take any action that will directly affect the financial interests of their home academic institution.

Post-employment restrictions – General⁵

Dilemma: Does my service as an IPA detailee limit the opportunities I can take on after I leave public service?

Response: Partially. IPA placements detailed to a Federal agency are subject to 18 U.S.C. § 207, which includes restrictions on representing or advising others (like one's home institution) in connection with the work completed during the IPA placement. Many of these restrictions expire after a cooling-off period of one to two years.

Post-employment restrictions – Executive schedule-level payment⁶

Dilemma: My total compensation package for my IPA detail placement clears the threshold for the base rate of pay for Senior Executive Service employees (SES). Am I automatically covered by the post-employment restrictions on senior level employees?

Response: Traditionally, SES employees are subject to a one-year cooling off period that prohibits the employee from representing anyone before their former agency within one year after leaving the SES position. An IPA paid at a rate equivalent to an SES is subject to these restrictions.

Financial Disclosure⁷

Dilemma: As an IPA placement on a detail, am I required to submit a financial disclosure?

Response: IPA placements on a detail are subject to the 1978 Ethics in Government Act. This requires that any IPA who is detailed to a position already established as a ‘designated public filer position’ must file an SF 278 form. Those completing duties relevant only to a specific assignment project are not required to submit an SF 278 but may be required to fill out a Confidential Disclosure Report depending on their agency’s guidance.

Representing a Home Institution – Federal employees on IPA assignment⁸

Dilemma: I am a federal employee on assignment to a state/local government. As part of my work for the state/local government, I work directly with my home federal agency. Am I permitted to represent the interests of the state/local government in my role as an IPA?

Response: Yes, if the representational activity is clearly included within the scope of the IPA employee’s assignment as determined by the federal agency head.

- Source:** 3374(c) of Title 5 U.S.C.
Reference: “Letter to a DAEO dated June 18, 1979.” Opinion Letter 97x1, Office of Government Ethics. June 18, 1979.
- Sources:** 5 U.S.C. Chapter 73 (employment limitations, political activities, foreign gifts and decorations, gifts from prohibited sources, gifts between employees, certain kinds of misconduct, and drug and alcohol abuse); the Ethics in Government Act (financial disclosure and outside earned income limitations), section 27 of the Office of Federal Procurement Policy Act (procurement integrity), 18 U.S.C. §§ 203, 205, 207, 208, and 209 (the criminal conflict of interest statutes); 6 18 U.S.C. §§ 602, 603, 606, 607, 643, and 654 (political contributions, accounting for public money, and conversion of property); 18 U.S.C. §§ 1905 and 1913 (disclosure of confidential information and lobbying with appropriated monies); and 31 U.S.C. §§ 1343, 1344, and 1349(b) (passenger motor vehicle and aircraft purchase and use)
Reference: Memorandum... to Designated Agency Ethics Officials Regarding Intergovernmental Personnel Act Summary.” Memorandum 06x10, Office of Government Ethics. October 19, 2006. pg. 6
- Source:** 18 U.S.C. § 205(a)(2)
Reference: Memorandum... to Designated Agency Ethics Officials Regarding Intergovernmental Personnel Act Summary.” Memorandum 06x10, Office of Government Ethics. October 19, 2006. pg. 4
- Source:** 18 U.S.C. § 208, which prohibits an employee from participating personally and substantially in any particular matter that would have a direct and predictable effect on his own financial interests, or on the financial interests of, among others, any organization which he serves as officer, director, trustee, general partner or employee; or any person or organization with which he is negotiating for, or has any arrangement concerning, future employment.
Reference: Memorandum... to Designated Agency Ethics Officials Regarding Intergovernmental Personnel Act Summary.” Memorandum 06x10, Office of Government Ethics. October 19, 2006. Pg 6.
- Source:** The criminal postemployment statute, 18 U.S.C. § 207, imposes a number of different restric-

tions on the activities of former Federal Government employees. They include: (1) the lifetime prohibition on representing others in connection with the same particular matter involving specific parties in which the former employee participated personally and substantially, 18 U.S.C. § 207(a)(1); (2) the two-year prohibition on representing others in connection with the same particular matter involving specific parties that was pending under the employee's official responsibility during the last year of Government employment, 18 U.S.C. § 207(a)(2); (3) the one-year prohibition on representing, aiding, or advising others about certain ongoing trade or treaty negotiations on the basis of certain nonpublic information, 18 U.S.C. § 207(b); (4) the one year cooling off period that prohibits a former senior employees from representing anyone before his former agency or department in connection with any matter for one year after terminating his senior position, 18 U.S.C. § 207(c); and (5) the restriction on certain post-employment activities with foreign entities, 18 U.S.C. § 207(f). Generally, all of these provisions apply to IPA detailees.

Reference: Memorandum... to Designated Agency Ethics Officials Regarding Intergovernmental Personnel Act Summary.” Memorandum 06x10, Office of Government Ethics. October 19, 2006. Pg 8.

6. **Source:** According to 18 U.S.C. § 207(c), an IPA placement's pay is considered equivalent to a SES if it meets two thresholds. (1) Total pay is equal to or greater than 86.5% of level II of the Executive Schedule (2) and either (2a) the IPA placement was to a SES position, (2b) the IPA detailee's employer was reimbursed at this rate, or (2c) the combination of the IPA's Federal and non-Federal pay was above the threshold.

Reference: Memorandum... to Designated Agency Ethics Officials Regarding Intergovernmental Personnel Act Summary.” Memorandum 06x10, Office of Government Ethics. October 19, 2006. Pg 8.

7. **Source:** 5 U.S.C. app. § 101(f)(3)

Reference: Memorandum... to Designated Agency Ethics Officials Regarding Intergovernmental Personnel Act Summary.” Memorandum 06x10, Office of Government Ethics. October 19, 2006. Pg 10.

8. **Source:** 18 U.S.C. §205

Reference: “Memorandum of Opinion for the General Counsel of the Federal Bureau of Investigation, Application of 18 U.S.C. § 205...” Department of Justice Office of Legal Counsel. January 11, 1999. Pg. 1

Appendix C: Foundation Funding for IPA Agreements

During the Partnership’s management of the IPA Talent Exchange Program (2021-2023), a number of philanthropic foundations expressed interest in and provided funding for the placement of IPAs in the federal government. Foundations can choose to fund IPAs that will work on issues and causes directly related to that organization’s mission and goals (i.e., environmental protection, racial equity, etc.).

Securing foundation funding for an IPA, however, is not a straightforward process. Foundations often work with third-party organizations (also known as pass through organizations), such as a non-profit, to recruit IPA candidates, manage the IPA hiring process, and handle the financing. The “pass through” aspect refers to the third party receiving the funding, with the addition of an administrative/overhead fee, and dispersing it to the candidate’s home institution once they are placed. See section on **Pay Structure** for more information on cost sharing and reimbursement of IPA funding.

In most cases, foundations must approach a federal agency, home institution, candidate or pass through organization directly with the offer of funding. There is no centralized resource that catalogues foundations that may be interested in supporting an IPA. From the Partnership’s experience, foundations cannot be lobbied for funding individual IPAs by agencies or the private sector.

Foundations may also have connections to candidates that they would like to place in a federal IPA role. From the Partnership’s experience, the foundation would refer the candidate to the pass through organization and from there, the candidate would be shepherded through the recruitment and hiring process.

It is also possible that a foundation may choose to simply identify a candidate, guarantee their funding, and work with the home institution to transfer the funds. In this case, the candidate and the home institution would be responsible for managing the IPA hiring process without additional guidance or assistance.

Please note that foundation interest and funding for IPAs is never guaranteed. If an agency or candidate is interested in an IPA, both of these parties should discuss the availability of funding from the federal agency or the candidate’s home institution.

Appendix D: FAQs for Federal Hiring Managers

The Intergovernmental Personnel Act is a great way for the federal government to recruit talent from the academic and nonprofit sectors. But as a hiring manager, you may need to rally support among several internal players to formalize an IPA appointment. Below is a list of questions frequently asked by other hiring managers and suggested responses for addressing those questions.

Budgeting for an IPA position

Q. When should I initiate discussions about a proposed IPA appointment with my budget office?

A: Start the conversation as soon as program office leaders have approved the proposed IPA idea. Ideally, initiate these conversations before identifying a candidate. The budget office needs a rough estimate of the costs of the IPA to make its decision. If funds are available within the program's budget, the budget office will direct the program office to proceed with the recruitment process. If sufficient funds are not available, the program manager can work with the budget office to identify offsets elsewhere. For example, the program manager may opt to reduce planned training or travel, delay replacing separated federal staff or use funds from contracts that come in under cost to cover the costs of the IPA.

Q. My budget is already set for this year and next. What if my office just now decides to create and fill an IPA position?

A: The budget office would treat this as it does any unexpected budget items that arise during the course of a fiscal year. If your office has funds programmed already that can accommodate the unexpected expense, great! If the budget is maxed or inadequate, your office may conditionally approve an IPA candidate if that candidate's home institution can cover all or some of the salary costs. It might expedite the reprogramming request if your office identifies planned expenses that it will forego in exchange for approving IPA funding. If the surprise candidate will remain with you into the next fiscal year(s), make sure the IPA line item is included for those years as well.

Q. What if a charitable foundation that is interested in an IPA appointee's work offers to contribute funds toward overall IPA costs?

A: Federal programs must have statutory "gift authority" to be able to receive and spend funds beyond their congressionally provided appropriation. In general, most federal programs do not have the requisite gift authority. Therefore, receiving such funds is not allowed under appropriations law.

However, non-federal organizations such as states and universities tend to have more flexible rules. A foundation is generally allowed to provide third-party funds to the non-federal home institution if allowed. If you believe that your agency has the authority to receive gifts, consult with your budget or finance office as well as legal counsel to determine the best way forward.

Additionally, please see **Appendix C** for more information on foundation funding for IPAs.

Q. What if a charitable foundation offers the non-federal home institution, and not my agency, a grant toward overall IPA costs—and that foundation has business planned or pending with my agency?

A: Donations or grants to the home institution must not present a conflict of interest, nor appear to present a conflict of interest. In other words, if such contributions would be suspect when directly made to your agency, the IPA agreement should not be used solely to keep such a transaction "off the books."

Q. My budget officer told me we can't afford to bring an IPA on board. Is this the end of my efforts to pursue an IPA appointee?

A: Not necessarily. Federal agencies may agree to pay all, some or none of the costs associated with the assignment. The same goes for a candidate's home organization. If you have a candidate in mind, it might be worth checking with the home organization to see if it is willing to cover the costs for a developmental assignment such as a term-limited detail.

If that doesn't work, feel free to work with your budget office to make funding available by identifying what services can be foregone to pay for the detail, such as reduced travel, training or contract costs. You can also offer to leave vacant positions unfilled and use the funds from those positions to pay for the costs of the IPA assignment. The budget office staff's default response might be, "No, you can't afford it," but they're generally open to identifying offsets to help meet program objectives.

If you still don't have the funding in the current fiscal year, tell the budget office that you want to work with it this year on including the costs of an IPA assignment into next year's operating budget.

Q. What will my budget office likely ask me about when I first discuss with them the feasibility of an IPA placement?

A: Is your program's budget currently on schedule, running a surplus or in deficit? If the latter, where would you propose offsets to make up the necessary funds? Are there vacant positions in your program that you would leave unfilled to cover the costs of the appointment? What other offsets can you provide to free up the necessary funding? Is this something that can wait until next year after we've had a chance to work with you on incorporating the costs into your operating budget?

Negotiating for an IPA position and candidate

Q. The home institution wants a position description and an explanation of the candidate's timeline for placement. When can I share that?

A: The federal program's human resources office will need a position description fairly early in the process to determine if the candidate's target grade and pay are commensurate with their duties. You can share this description with the home organization at any point during the process. In fact, something very similar to the position description will likely be posted on the federal program's website announcing the IPA opportunity.

The actual timeline for the candidate's placement is included in Section 5 of the [OF-69](#) and can be shared when that document is complete and ready for the home organization's signature. Of course, there's no problem sharing a notional timeline between the time a candidate is identified and the finalization of the OF-69.

Q. When is it OK to commit my agency to moving forward with a specific candidate under IPA authority?

A: Once agency leadership has approved the appointment and the following reviewers have preliminarily agreed that the terms of the arrangement are appropriate for the assignment, you can share a partially completed OF-69 form with the non-federal home institution for review. Reviewers who should consent to the agreement:

- Budget: to ensure that adequate funds are available.
- Human Resources: to ensure that the candidate's target grade is commensurate with the duties that person will perform.
- Ethics or Legal: to ensure that the source of funds to pay the costs is appropriate. Ethical concerns about a candidate's personal or business relations are assessed in the final stages of candidate placement.

To move forward before reviewers have approved the terms and conditions of the assignment risks having the assignment denied after the candidate and their home institution thought an appointment or detail was imminent.

As a best practice, you should provide reviewers with as much information about the IPA assignment as possible early on. While some specific information cannot be known until a candidate has been identified, the process will go more smoothly if a package for reviewers includes a partially completed OF-69 form and a draft position description. These documents will have to be finalized for approval by both the home and federal organization once a candidate has been selected and all the details of the assignment are known.

Q. We are going to bring our IPA candidate on board as a federal employee for the duration of the appointment. What if the candidate under consideration earns more at their school or home institution than what we will pay them?

A: The government is not obligated to match or exceed a candidate's most recent salary, so a candidate could earn less as an IPA placement than elsewhere. However, other measures may be considered to support the candidate's federal income and make the appointment more attractive. Cost-sharing arrangements could include supplemental pay, fringe benefits, a per diem allowance or relocation costs. Side income earned by a candidate such as consulting fees could also be allowed to continue during the appointment. In addition, the contributing employer could continue to pay the candidate some or all of the existing salary during the IPA period, such as in the case of a sabbatical.

Q. We are going to bring our IPA candidate on board as a federal employee for the duration of the appointment. What if the candidate under consideration earns less at their school or home institution than what we will pay them?

A: While serving in a federal agency, the candidate must be compensated for the base pay that agency would have provided to a similarly qualified individual seeking full-time federal employment. This is an acceptable combination of circumstances as long as everyone is aware that placements are term-limited, and an individual must return to their previous position (and previous salary) at the end of the appointment. The contributing employer can make whatever salary arrangements it wants with its employee at that time.

Q. Should I identify a potential candidate first and then explore IPA as an appointment authority?

A: The IPA is a noncompetitive appointment authority and not subject to the normal restrictions when it comes to selecting candidates. You can choose a candidate first and then pursue IPA as a method of appointment, or you can create and fund an IPA position first, and then pursue candidates to fill it. This process will depend on the nature of your agency's needs and circumstances.

Q. When do I start talking to the home institution about the potential salary requirements for the candidate they might contribute to my team?

A: If you've selected a potential candidate, already have preliminary approval from your agency leadership, ethics, human resources and budget offices, and the candidate has expressed interest in taking the appointment. You may begin negotiating with the candidate's home organization once you have preliminary approval from the offices and reviewers listed above.

Q. I don't have experience negotiating salary on behalf of an employer, but I seem to be expected to do just that as the home institution and I discuss a potential IPA appointment. How do I process this overwhelming responsibility?

A: Think of it like you would any other purchase you might make. You believe the candidate will provide

value to your organization; you have a sense of how much that value is worth; and, based on discussions with your budget office, you assume that adequate funds are available. Ask the candidate's home organization what the candidate's current compensation package is and propose a reimbursement agreement that splits the costs based on the relative benefit of the assignment for the two organizations.

Let's say the candidate's current compensation package is \$200,000 per year. If you and the home organization agree the relative benefit to each organization is 50%/50% and you both have \$100,000 available, you're very close to an agreement. If, on the other hand, you only have \$75,000, you may want to ask the home organization if they can make up the shortfall for the sake of the candidate's development. Naturally, if you have \$125,000 available and can bring the candidate aboard for \$100,000, you still have \$25,000 available for your program's operation.

Consulting with stakeholders to finalize the IPA placement

Q. There are so many required approvals to make this happen. Where do I start?

A: The IPA agreement can't proceed until the preceding reviewer has approved the concept of the detail, so start with your agency leadership. If they do not approve, there is no point in discussing the appointment with your human resources, budget and ethics offices. If leadership approves, check with the budget team to make sure adequate funds are available. If given funding approval, then approach human resources and ethics.

Q. How do I integrate this information to build toward a signed agreement?

A: The IPA hiring process workflow chart (**Appendix A**) will give you a general idea of how to proceed. Start by getting approval from agency leadership and proceed through each of the approving offices (budget, human resources and ethics). Be prepared to work with each of them iteratively as new details emerge. For example, as you move through the process, you may discover that a particular candidate requires more funding than you initially had proposed to your budget office. Be prepared to go back to the office with the new requirements and hammer out the details.

Q. What will human resources likely ask me about when I first discuss with them the feasibility of an IPA placement?

A: The office will want to see a job description—or something similar—that describes the duties and responsibilities of the position to be filled so they can assign a grade level to the role. The office might want to know that the legal authority for assignments under the Intergovernmental Personnel Act is 5 USC sections 3371 through 3375, and the regulations are 5 CFR, part 5, chapter 334.

Q. What will legal or ethics likely ask me about when I first discuss with them the feasibility of an IPA placement?

A: Early in the process, before you have a specific candidate in mind, your ethics office will want assurances that the duties performed by the eventual candidate fall within the purview of the program's authorizing legislation. That is, funds appropriated to an agency for its authorized purposes may not be used for activities outside that authority.

For example, an individual brought on by the Mine Safety and Health Administration, whose authority is to inspect mines, may not be employed to inspect workplaces unrelated to mining. Those workplaces fall under the purview of the Occupational Safety and Health Administration. The ethics office will also be interested in knowing if any unappropriated funds will be used to pay the costs of the detail. For example, if you plan to use funds from a philanthropic organization, then you should consult your appropriations or ethics counsel, and your budget office.

Once you have a specific candidate in mind, your ethics office will be interested in any personal or business relations that may affect the candidate's ability to work impartially and in the public interest. For example, a candidate who has business dealings with the federal program for which they'll be working for may pose a conflict of interest.

Q. What will my own program leaders likely ask about when I first discuss with them the feasibility of an IPA placement?

A: They will likely ask you about the legality of an IPA assignment. Be prepared with some [general information](#) about the authority created by the Intergovernmental Personnel Act. They may want to know why you would like to fill this position with a detailee or appointee instead of filling it with a federal employee. They will certainly want to know if your program can afford it or if you are asking them to divert funds from another program to yours. This is usually a high bar and an indicator that you may not have exhausted the opportunities available to you. You may want to anticipate this question and do a quick consultation with your budget office if financing a detail is possible at this time.

Q. What will the candidate likely ask me about as the discussion progresses?

A: They will likely ask a lot of questions about logistics. The answers are provided elsewhere in our materials or by you, depending on varying circumstances. Some examples include:

- Where will I be working?
- When would I start?
- How will I get paid?
- Can I continue to make money from my outside consulting work?
- Will I be reimbursed for travel expenses?
- Will you cover relocation expenses for me and my family? How about per diem expenses?
- What happens after I finish this assignment?
- Can I use this appointment to become a career federal employee?

Q. What will the home institution likely ask me about as the discussion progresses?

A: If they've never heard of an IPA assignment, you may have to familiarize them with the [general outlines](#) of the program. They will ask how you envision costs being distributed between the two organizations. You could begin by discussing the relative benefits received by both organizations and make an offer based on your assessment of those benefits. You may want to discuss that this will involve a Memorandum of Understanding between the two organizations, typically established using the OF-69 form, that outlines the terms and conditions of assigning a staff member from one organization to another. It could also be helpful to share a sample OF-69 from another assignment, and they will certainly want to know the duration of the assignment. To give them a general idea of what you have in mind, you may want to share the IPA opportunity announcement posted on your website.

Q. How long should it take my human resources office to establish an IPA position and process an IPA candidate from start to finish?

A: This will vary by human resources office and depend on how familiar each office is with the IPA authority. IPA appointments are noncompetitive and should therefore track with the timelines of other noncompetitive appointments like Schedule A and Peace Corps candidates. In most instances, IPA appointments are not preceded by job opportunity announcements because those are associated with competitive processes. On average, the Partnership has seen processing times of 3-6 months for IPAs.

Appendix E: Mock Scenario for Consulting Income Questions

The Scenario

Pam is a tenured professor at Bean University in Boston, whose accrediting agency is recognized by the U.S. Department of Education. Pam’s area of expertise is financial analysis and her recent areas of research include small business success and management. She plans to take a sabbatical next year and has expressed interest in serving as an IPA appointee at the Department of Labor (DOL) during her time away from the classroom. Labor is interested in bringing on an IPA with Pam’s skill set. After some back-and-forth on the details of the opportunity, the agency asks Pam to provide her current salary so it can generate a tentative offer letter.

In addition to her role as a professor, Pam has regular speaking engagements with the local business incubator in her community, SmartStart. SmartStart pays Pam directly for her speaking engagements and Pam uses those funds to supplement the income she receives from Bean.

Below is a breakdown of Pam’s total annual compensation:

- \$81,800 for Pam’s university salary.
- \$17,350 for Pam’s independent speaking engagements.
- \$14,888 for Pam’s university health and retirement benefits.

Her total annual compensation is \$114,038. The job at DOL is in Washington, D.C.

Things for Pam to Consider

Q. Does Pam disclose all of her current employment and professional engagements to Labor?

A: Yes. Volunteer engagements, board memberships and private consulting can present conflicts of interest for a potential IPA engagement and must be disclosed.

Q. Q: Does Pam have to disclose all of her income in response to the request for her current salary?

A: No. After she passes her ethics check—which would identify work that she must discontinue before onboarding at Labor—Pam should only produce proof of income that she wants the government to “match” or “replace” in its tentative salary offer. If she plans to continue her side work with the agency’s approval, she should not include that part of her income in what she shares with Labor. If she plans to pause her consulting to accept the IPA appointment, she should disclose that amount in her response.

Q. Does Pam provide the total compensation number of \$114,038 to Labor?

A: This will vary by agency and circumstance but here are common answers:

- If Pam is either continuing her Bean University benefits or enrolling in federal ones, she would likely exclude the value of her benefits in the salary number she provides to Labor.
- If Pam is discontinuing her benefits entirely—for example by moving to a spouse’s plan when the IPA appointment begins—she would include the value of the “lost” benefit(s) in the salary number

she provides to Labor.

- It is unusual for a federal agency to assign a dollar value to its benefits package, but in theory it could use such a number to determine a fair “total compensation” offer for Pam, in either direction.
- If Bean University will continue to pay Pam’s salary during the IPA period, Labor can either skip the salary offer altogether or make up any difference in compensation between the agency’s number and the university’s number. This arrangement would be worked out between Labor and the university as part of their memorandum of understanding, or MOU.

Q. If Pam’s consulting work presents a conflict of interest, can she recuperate the income she’s losing?

A: The intent and structure of the IPA program is to ensure that the participant does not lose anything in accepting a federal opportunity. Labor should be able to match or beat Pam’s current salary, but agencies might differ in how that works, exactly. If Pam is very highly compensated at Bean University, Labor can make the best possible salary offer consistent with its own policies and authorities. Pam can choose to accept or decline this offer.

Q. If Pam needs to relocate to work at Labor, will she be reimbursed for moving expenses?

A: This is entirely dependent on the MOU signed by both employers and the federal agency’s policy on travel and relocation. Pam can certainly request that reimbursement be included in the agency’s tentative offer.

Q. What steps does Labor take once it receives Pam’s substantiated salary request?

A: This is one example of an order of operations. Steps can vary significantly. 1). Match the salary ask with an appropriate grade level—GS-13—in its Boston office that will accommodate the request. 2). Make an offer at the GS-13 level in Washington, D.C., in accordance with its own pay setting policies if it were moving a GS-13 employee from Boston to the Beltway. This move will sometimes result in a small salary bump to accommodate the difference in location.

Q. What if Pam’s university job included 25% of work time devoted to discretionary research activity?

A: Labor could include that same provision in its offer. It could also offer a reasonable salary supplement to offset the discontinuation of this research during the IPA period, if appropriate, or take no action at all. In addition, Bean could continue to pay 25% of Pam’s university salary during the IPA period. This matter, like others, is negotiable between Pam and both employers. Pam can also decide that her 25% research time is too precious to surrender and not pursue the IPA opportunity further.

Appendix F: IPA Case Study (HUD)

Leveraging innovative ideas for new place-based initiatives and approaches in the Obama administration

When Salin Geevarghese began serving under an Intergovernmental Personnel Act placement at the Department of Housing and Urban Development, he had already spent almost 15 years working to understand and implement the policy and program interventions that give vulnerable children and families—and the places they live—the capacity and resources needed to thrive.

At the time, Geevarghese was a senior associate at the Annie E. Casey Foundation, where he helped lead a new program unit focused on responsible neighborhood redevelopment and regional equity. Then, at the beginning of the economic recession in December 2008, he was asked to serve on a HUD-focused transition committee for the new Obama administration tasked with formulating innovative ideas to reimagine the agency. Soon thereafter, White House and HUD leaders asked Geevarghese to serve as an IPA at the department, believing that he possessed the skills and capacities to work both within HUD and across different federal agencies.

As an IPA, Geevarghese was part of the leadership team supporting a collaboration between HUD, the Department of Transportation and the Environmental Protection Agency called the Partnership for Sustainable Communities.

As part of this work, he helped launch and staff a new HUD office, the Office of Sustainable Housing and Communities, and worked with leaders within the agency and across the administration to create the Sustainable Communities Initiative, a six-year program that represented the largest federal investment in comprehensive, integrated planning across agencies in 40 years. The program awarded 143 grants and conducted planning efforts that impacted 40% of the U.S. population.¹⁶

These investments were designed to work in alignment with other grants and interventions across the federal system in a transformational attempt to foster an “all of government,” aspirational approach to local problem solving.

Throughout his tenure, Geevarghese worked directly with members of the White House, senior leaders in other agencies and in the HUD secretary’s office, state and local government leaders, domestic and international stakeholder leaders from nonprofits, private sector trade associations and industry groups, and philanthropic leaders interested in place-based policy solutions to social, community and economic challenges.

He acknowledged that the work could be “intense,” but emphasized that there was a sense of “urgency” to get things done and take advantage of “a window to make change.” “We had to match the scope and scale of solutions to the scope and scale of the challenges we were facing,” he said.

Geevarghese’s contributions were made possible by a reimbursable IPA agreement between HUD and the Annie E. Casey Foundation. Geevarghese ultimately converted from an IPA to a senior political appointee, serving over seven years in the Obama administration—first as senior advisor, then as acting director of the Office of Sustainable Housing and Communities, and ultimately as deputy assistant secretary in the Office of Policy Development and Research.

Geevarghese's application also helped certify the Annie E. Casey Foundation as an eligible organization to send IPAs, thus opening the doors for dozens of other Casey Foundation employees to serve as placements as well.

The perspectives he brought to the federal space as an expert and thought leader on the outside prompted HUD to innovate in other ways, including allowing foundation program officers to serve on review panels—a change that has made the agency's grant-making process more impactful and outcomes-driven.

For Geevarghese, the IPA exchange “was an unbelievable opportunity for the son of an immigrant to serve the country and to represent, both domestically and internationally, the U.S. government at the highest level.”

It was also a “transformational chance to understand how federal capacity, policy and investment can both erect barriers to change and be mobilized to solve problems with local leaders.”

“Most experts and advocates aspire for the federal government to perform at higher levels without knowing exactly how it functions,” he said. “The IPA exchange gave me an insider's take, and it's been enormously valuable in my work now—over 10 years later.”

Appendix G: IPA Case Study (NSF Rotator Program)

For almost 40 years, the National Science Foundation has brought career scientists and academic professionals temporarily into its ranks through the Intergovernmental Personnel Act—or IPA— Program. These individuals—along with staff hired through the Visiting Scientist, Engineer and Educator Program under the NSF Act of 1950—are known as NSF rotators.

Initial IPA assignments can be made for up to two years and may be extended for an additional two years if the extension benefits both organizations. Visiting Scientist, Engineer and Educator Program participants, or VSEEs, have a maximum two-year appointment at NSF. Rotators function as key connectors between NSF’s grant-making responsibilities and the needs of the scientific community the agency serves.

NSF was an early adopter of the IPA program because it recognized three benefits in participating.

First, IPA assignees bring a fresh perspective to the agency. Given the dynamic nature of scientific discovery, knowledge of ongoing research is imperative to the success of NSF’s mission.

Bill Malyszka, deputy chief human capital officer at NSF, noted that the IPA program enables the agency to be “more agile in looking at emerging sciences and bringing people in, evolving [its] grant programs as the science evolves.” Most importantly, NSF rotators with appropriate approval can continue to conduct their professional research, creating a direct link between NSF and the scientific community.

Second, IPA assignees gain a great deal from working as NSF rotators. As rotators, they get the opportunity to expand their network and grow professionally without leaving their primary career.

According to [NSF](#), rotators who join one of the agency’s directorates get the chance to “make recommendations about which proposals to fund, influence new directions in the fields of science, engineering and education, support cutting-edge interdisciplinary research, and mentor junior research members.” After IPAs return to their non-federal organizations, they use their newfound knowledge to inform future research.

These non-federal organizations benefit from the IPA Program as well. When IPA placements return home, they bring with them a wealth of first-hand knowledge about the federal research funding process.


In addition, NSF requires that institutions provide just a minimum 10% cost share for every full-time agreement—a small price to cover relative to the benefits received. Non-federal organizations also develop a relationship with NSF by coordinating with the agency to place IPA candidates, along the way gaining NSF recognition as a respected part of the scientific community.

“[The IPA program] is so important because it brings in perspectives, it brings in connections, it brings in relationships,” Malyszka said. “[When the IPAs] leave the building, those relationships with our folks go back out into the science community, and so I think the rotators serve really as a bridge between NSF and who we serve.”



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