

**SECTION 85—ESTIMATING EMPLOYMENT LEVELS AND THE EMPLOYMENT  
SUMMARY (SCHEDULE Q)**

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**Summary of Changes**

Updates guidance on personnel estimates (section [85.3](#)).

Updates guidance on FTE estimates (section [85.5](#)).

**85.1 How should my agency's budget address workforce planning and restructuring?**

Your budget submission must identify the human capital management and development objectives, key activities, and associated resources that are needed to support agency accomplishment of programmatic goals.

**85.2 What terms do I need to know?**

*Employee*, as defined in [5 U.S.C. 2105](#), means an officer or an individual who is appointed under a delegated authority, is engaged in the performance of a Federal function, and is subject to the supervision of an officer or employee of the Federal Government.

*Full-time equivalent (FTE) employment* means the total number of regular straight-time hours worked (i.e., not including overtime or holiday hours worked) by employees divided by the number of compensable hours applicable to each fiscal year. Annual leave, sick leave, compensatory time off and other approved leave categories are considered "hours worked" for purposes of defining full-time equivalent employment that is reported in the employment summary (see section [85.6](#)). A list of compensable days (with associated hours) is provided in section [85.5\(c\)](#).

**85.3 What should be the basis for my personnel estimates?**

(a) *Staffing Requirements*. Base estimates for staffing requirements on expected workforce transformations that align with the Administration's efforts to streamline, eliminate or reduce programs. Personnel should be reassigned, to the maximum extent, to align with the agency's reorganization and reduction efforts. Agencies should account for reduced hiring as reflected in current administration guidance. These actions

should be part of your agency's overall human capital strategy. Where information technology systems are installed or enhanced, gains in productivity should result in lower personnel requirements after the first year. You should be prepared to explain the assumptions underlying staffing requirement adjustment upon request.

Where appropriate, use calculations converting workload to required personnel that include an estimate of available workhours per employee. You should exclude annual leave, sick leave, administrative leave, training, and other non-work time from these calculations. Base estimates of available time on current data, reflect steps taken to improve the ratio of available time to total time, and recognize differences in available time by organization, location, or activity. Base exclusions for annual and sick leave on current experience of actual leave taken rather than leave earned. Employment levels should reflect budget proposals and assumptions with regard to workload, efficiency, proposed legislation, interagency reimbursable arrangements, and other special staffing methods. Employment intended for proposed legislation, or for carrying out proposed supplemental appropriations, cannot begin until the additional funds become available by congressional action. Employment proposed for activation of new facilities or start-up of new programs cannot begin until the new activity begins. Employment under estimated reimbursable arrangements also cannot begin until such arrangements have been negotiated and justified.

(b) *Personnel resources.* Base estimates of personnel resources on the total number of regularly scheduled straight-time hours (worked or to be worked) in the fiscal year (see section [85.5\(c\)](#)). Note that, although budgetary resources must be sufficient to cover any extra compensable days in a fiscal year, some of the corresponding outlays may not occur until the following year.

(c) *Requirement for FTE data.* Wherever entries in schedules or materials required by this Circular pertain to personnel requirements or total employment levels, state such entries for all years in terms of FTEs, as defined in section [85.2](#), unless another measure is explicitly required. For military employment, see section [85.9](#).

#### **85.4 What is the requirement for reporting civilian FTE data in the Budget?**

With the exception of some national security functions, agencies will report prior fiscal year civilian FTE actuals in MAX A-11 DE schedule Q each fall, along with current and budget year estimates. Therefore, agencies should maintain a system of accounting for their FTE on a regular basis.

#### **85.5 What do I need to know about FTE budgeted levels?**

(a) Federal FTE requirements

Agencies have the flexibility to manage their FTE levels, within their budget constraints, and to determine how many FTEs are required to successfully accomplish their mission. In exercising this authority, agencies may put into place internal management controls with respect to FTEs that, among other things, help to ensure that the agency does not exceed its appropriated funding level. Within their own authorities, agencies generally may use appropriated funds available for such purposes across the total workforce to accomplish their missions in the most efficient manner. For the current and budget years, each agency's Federal workforce estimates should reflect FTE levels that are funded in their submission to OMB and should not include unfunded positions. Agency submissions should include supporting data to justify and validate those FTE estimates.

(b) Workforce conversions

Agencies should not convert the work of their employees to contractors unless they determine that the work is not inherently governmental (as defined in the Federal Activities Inventory Reform Act of 1998, P.L. 105-270), the agency has sufficient internal capability and capacity to maintain control of its mission and operations, and the agency undertakes cost comparisons that demonstrate that such a conversion is of financial advantage to the Government (see [OMB Circular A-76](#)). Pursuant to [41 U.S.C. 1710](#) and [10 U.S.C. 2461](#), agencies are precluded from converting, in whole or in part, functions performed by Federal employees to contract performance absent a public-private competition (a practice known as "direct conversion"). The conversion of work from in-house to private sector performance may only occur through public-private competition. Appropriations acts since 2009, however, have prohibited agencies from using funds to "begin or announce a study or public-private competition regarding the conversion to contractor performance of any function performed by Federal employees pursuant to Office of Management and Budget Circular A-76 or any other administrative regulation, directive, or policy." See, e.g., Section 737 in Division D of Omnibus Appropriations Act, 2009, Pub. L. No. 111-8.

(c) Determining FTE usage

You must prepare budget estimates relating to personnel requirements in terms of FTE employment as specified in this Circular.

Agencies may choose from two methods to determine current year and budget year FTE employment estimates:

**Regular Method**—Divide the estimated total number of regular hours by the number of compensable hours in each fiscal year. Divide the total regular hours worked during the actual fiscal year (October 1–September 30) by the number of compensable hours shown in the table below for the applicable fiscal year. The regular method derives compensable days by counting days in the standard Monday-through-Friday workweek in the given fiscal year. Compensable hours are derived by multiplying the number of compensable days by 8 hours (i.e., the standard workday).

**Pay Period Method**—Divide regular hours worked during a period of 26 biweekly pay periods (closely corresponding to the fiscal year) by 2080 hours. (The 26 biweekly pay periods cover 52 weeks with 40 hours in a standard workweek.  $52 \times 40 = 2080$ .) The 26 biweekly pay periods that closely correspond to a fiscal year are identified as the pay periods that end in the given fiscal year. If there are 27 pay periods that end in a fiscal year, agencies should drop the one implicating the fewest work days in that fiscal year, so that 26 pay periods are always used.

FTE employment levels apply to straight-time hours only. Include foreign national *direct* hire employees in your FTE employment totals. FTEs funded by allocations from other agencies will be included with the performing agency where the employees work and are paid (see section [85.7](#)).

Be sure to include in FTE employment estimates for all Federal employees, including persons appointed under the Worker Trainee Opportunity Program, Federal Cooperative Education Program, summer aids, Stay-in-School Program, and the Federal Junior Fellowship Program.

COMPENSABLE DAYS AND HOURS FOR CURRENT AND FUTURE FISCAL YEARS USING  
REGULAR METHOD

Fiscal Year	Days	Hours
2025	261	2,088
2026	261	2,088
2027	261	2,088

(d) Justification and estimates of FTE usage

The FTE estimates for each agency are determined at the time of the annual budget review, for the fiscal year in progress and for the succeeding fiscal year. In addition, you must ensure that the FTE estimates are consistent with all applicable laws. In particular, some statutes providing agencies with authority to use voluntary separation incentive proposals (or "buy-outs") stipulate that agency-wide FTE levels must be reduced one-for-one for each buy-out. Further, FTE estimates must represent an effective and efficient use of resources to meet program requirements.

Current year FTE estimates should be consistent with PY actuals, should be fully funded, and should be very close to the actual usage reported at the end of the fiscal year. For example, the estimates in the previous Budget should be very close to the actuals published in the current Budget.

(e) FTE transfers between agencies

Prior to entering into new or expanded agreements to perform work for other agencies on a reimbursable basis, you must prepare a cost justification. As part of this agreement, you may transfer FTEs on a one-for-one basis, provided that you notify OMB prior to making such a transfer. You may proceed with the FTE transfer fifteen days after notification to OMB, unless OMB objects.

(f) Adjustment requests

Send all requests for adjustments in employment levels, including agreements to transfer FTEs between agencies, to your OMB representative.

**85.6 What do I need to know about the employment summary (schedule Q)?**

This schedule shows the total full-time equivalent (FTE) civilian employment of straight-time compensable work years (i.e., not overtime) financed by an account for PY through BY. FTE employment excludes estimates for terminal leave and overtime hours. The method for calculating FTE employment is described in section [85.5](#). You must provide an employment summary when an account contains an entry for either direct or reimbursable personnel compensation in the object class schedule (i.e., object class entry 11.1 or 11.3 (see section [83.7](#))). You must also provide an employment summary when employees are compensated via an allocation account. For reimbursable and allocation FTE arrangements, see the discussion on their budget schedule treatment in section [85.7](#). This schedule also shows military average strength employment as discussed in section [85.9](#).

The definition of object class 11.1 stipulates that compensation must be included for all workdays in the fiscal year. You must ensure that FTE levels in the employment summary and funding for FTEs in the object class schedule are reported consistently.

You must also ensure that agency-wide FTE totals agree with the negotiated levels in the current and budget years. Prior year FTE in the employment summary must equal your agency's FTE execution level.

When entering FTE data in schedule Q, use the four-digit line numbering scheme described in the following table:

**EMPLOYMENT SUMMARY (SCHEDULE Q)**

Entry	Description
Xxxx	The first digit of the line number distinguishes between direct, reimbursable, and other categories, consistent with the reporting of data in the object classification schedule (see section <a href="#">83.5</a> ). Use the following codes: 1—direct 2—reimbursable 3—allocation account
xXxx	The second digit of the line number distinguishes between civilian and military employment. Use the following codes: 0—civilian employment 1—military employment
xx0x	The third digit is 0.
xxx1	The fourth digit is 1.

**85.7 Are allocation and reimbursable FTE presented differently in the Budget?**

Yes, FTE financed by allocation and reimbursements are presented differently as depicted in the diagram below. In an allocation arrangement, the "parent account" receives the initial budget authority and delegates its obligational authority to another organization or agency in the form of an "allocation account." See section [20.4 \(1\)](#).

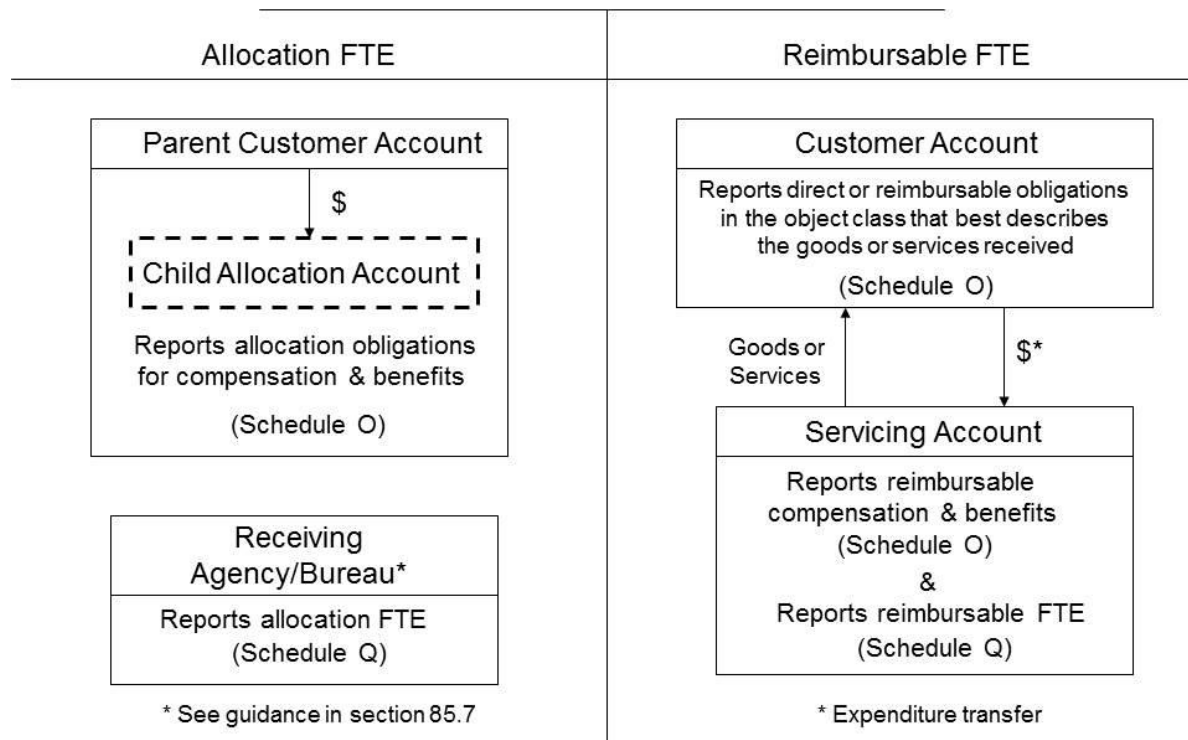
For Budget presentation, the parent and the receiving agency/bureau allocation account's obligations are all reported in the parent account while the allocation FTE are reported in the receiving agency/bureau. Allocation FTE are presented differently in order to be consistent with agency personnel reporting systems. The parent account does not show the receiving agency/bureau allocation FTE. The parent account only shows its own direct/reimbursable FTE. The allocation FTE are shown by the "receiving agency/bureau" in an account of its choice. When applicable, show the allocation FTE in an account that funds FTE performing a similar activity as the allocation arrangement. Allocation FTE are separately identified in schedule Q on lines 3XXX.

For example, if legislation mandates that OMB allocate funds to the Government Publishing Office (GPO) for printing requirements, then OMB will show allocation obligations in schedule O of the account that received the budget authority. The GPO will show the associated allocation FTE in schedule Q in an account that typically funds FTE involved in printing operations.

In a reimbursable arrangement, the customer account receives the services and reports direct or indirect obligations in the object class that best describes the services received (e.g., printing and reproduction). The transfer of funds to the servicing account is accomplished in the form of an expenditure transfer. The

servicing account reports reimbursable compensation and benefit obligations in schedule O. Likewise, the reimbursable FTE are reported in schedule Q of the servicing account.

## Allocation vs. Reimbursable FTE



### 85.8 How do agencies check FTE totals in the Budget?

OMB provides diagnostic reports on its website showing the status of FTE data in MAX A-11 DE by account. In addition, MAX A-11 DE has edits that check for missing FTE or inconsistencies between personnel compensation in schedule O and FTE levels in schedule Q.

### 85.9 How do I account for active duty military personnel in the Budget?

Your budget submission should also account for all active duty personnel in the seven Uniformed Services. These Services include the Army, Air Force, Navy, Marines, Coast Guard, plus the NOAA and PHS Commissioned Corps. Since active duty personnel are always full-time employees, attempting to compute full-time equivalents is not appropriate. Therefore, for active duty personnel, "average strength" data is used in place of FTEs for the prior fiscal year. Estimate average strengths for current and budget years as well. For the non-DoD Uniformed Services, record military average strengths in the MAX A-11 DE employment summaries using the line designated for military (see section [85.6](#) regarding schedule Q line numbers). The Department of Defense will continue to provide military employment data directly to their OMB representative.

**85.10 Are there other places in A–11 where I can find related guidance?**

- See the following table for additional guidance on Federal employment:

<b>Other Federal employment guidance and A–11 links</b>	<b>Section</b>
How should I estimate personnel compensation in my Budget request?	<a href="#">32.1</a>
What FTE-related information should I provide in my justification materials?	<a href="#">51.4</a>
Will OMB request FTE plans to support apportionment requests?	<a href="#">120.22</a>
Should I address workforce plans in the Strategic Plan or Annual Performance Plans?	<a href="#">230</a> & <a href="#">240</a>