U.S. General Services Administration

GSA Order: Internal Directives Management
OAS 1832.1C
Office of Administrative Services
directives@gsa.gov

Purpose:

This Order establishes policy, responsibilities, and procedures for GSA's internal directives program.

Background:

The Administrator of the General Services Administration (GSA) has the authority to issue policy and delegations for the

- effective operation of the agency;
- conduct of its employees;
- distribution and performance of its business; and
- custody, use, and preservation of its records, papers, and property (5 U.S.C. § 301).

The Administrator issues these regulations as internal directives or delegates authority to the Heads of Services and Staff Offices (HSSO) to issue as internal directives (5 U.S.C. § 302).

Applicability:

This Order applies to all GSA employees and contractors as they perform their duties. The following are exceptions:

a. The Office of Inspector General (OIG), given its independence under the Inspector General Reform Act of 2008 (5 U.S.C. §§ 401-424).

b. The Civilian Board of Contract Appeals, due to its independent authorities.

c. The Office of Government-wide Policy (OGP), Federal Acquisition Service (FAS), Public Buildings Service (PBS), and Office of Administrative Services (OAS) in those areas of acquisition policy that these units manage.

Cancellation:

This Order supersedes OAS 1832.1B, GSA Internal Directives Management.

Summary of Changes:

This Order updates:

1. The roles and responsibilities of the offices and officials involved in the internal directives management process;
2. The definitions of the types of internal directives;
3. The issuance process for all directives; and
4. The processes for maintaining and canceling directives.

Roles and Responsibilities:

a. The Administrator

    1. Delegates authority to Heads of Services and Staff Offices (HSSOs) (see Delegations of Authority Manual).

    2. Issues internal directives that cover areas not delegated to HSSOs.

b. HSSOs and Regional Commissioners

    1. Issue internal directives that govern their delegated areas of responsibilities.

c. Chiefs of Staff (or other designated officer)

    1. Serve as a point of contact between their Services or Staff Offices (SSO) and the Internal Directives Program.

d. Chief Administrative Services Officer

    1. Develops, administers, and maintains the GSA directives management system and provides advice and technical assistance to the SSOs on all aspects of the program.

e. Internal Directives Program

    1. Establishes standards and procedures for preparing, reviewing, and maintaining directives.

    2. Advises the HSSOs on creating and maintaining internal directives.

3. Manages the GSA internal directives library.

f. Office of Human Resources Management

1. Oversees the Delegations of Authorities.

2. Maintains the Delegations of Authority Manual.

Signature:

/S/_____ 10/10/2023_____

Bob Stafford
Chief Administrative Services Officer
Office of Administrative Services

Date

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1. Introduction

What is an internal directive?

An internal directive is a policy or guideline that is issued by a Federal agency for its employees to follow. GSA internal directives provide clear guidance on how to carry out specific tasks or procedures that apply to either more than one SSO or a significant number of GSA employees across more than one SSO.

Internal directives cover topics such as personnel policies, procurement procedures, information security protocols, and budgeting processes. They are often issued in response to changes in laws or regulations, or to address specific issues or challenges the agency faces.

Internal directives are an important tool for GSA to ensure that employees are following consistent and effective procedures and that they are complying with Federal laws and regulations. All internal directives must be issued through the GSA Internal Directives process. The current versions of all internal directives are stored in the GSA Directives Library.

Who can issue an internal directive?

The Administrator, HSSOs, or Regional Commissioners with delegated authority are responsible for issuing internal directives. The Delegations of Authority (DOA) Manual includes a complete list of authorities delegated to HSSOs.

When should an internal directive be issued?

The Administrator and HSSOs issue new and revised internal directives in response to or anticipation of:

1. Higher-level government authority such as laws, regulations, and executive orders.
2. New technology that affects policy or procedure.
3. Internal process improvements
4. Changes in operating conditions, or organizational changes.

If you are unsure whether you need to create an internal directive, contact the Internal Directives Program at directives@gsa.gov.

What should be considered when creating an internal directive?

To create an internal directive, several key considerations will ensure that the directive is effective and meets its intended purpose. Employees are encouraged to follow these guidelines:

1. **Purpose and Scope**: First, define the internal directive's purpose and scope. It must clearly outline what issue or matter it is intended to address, and which employees or departments within the organization it applies to.
2. **Legal and Regulatory Compliance**: The internal directive must ensure that the organization complies with any applicable laws, regulations, or industry standards. Conduct thorough research to ensure that the directive does not conflict with any existing laws or regulations.
3. **Consistency and Clarity**: Write the internal directive in clear and concise language, with specific and measurable guidelines. Make it consistent with the organization's overall goals, policies, and procedures.
4. **Implementation**: The internal directive must be practical and achievable, with clear steps for implementation. It must provide guidance on how the directive will be implemented and enforced, including any necessary training or resources required.
5. **Communication**: Consider how the directive will be shared with relevant stakeholders, including employees, managers, and other organizations within the agency.
6. **Review and Revision**: Review the internal directive periodically to ensure that it is still relevant and effective. Revise it as needed based on feedback and changes in the organization's operations or external environment.

By considering these factors when creating an internal directive, organizations can ensure that their directives are effective, practical, and meet their employees' and stakeholders' needs.

2. Types of Internal Directives

Internal directives are divided into two categories: temporary directives and permanent directives.

2.1 Temporary Directives

Temporary directives provide interim guidance to the agency during a time of change or emergency when there is not time to develop a permanent directive. They are intended to be implemented as short term solutions for temporary situations or to quickly respond to more permanent issues. GSA employees must follow the policies and procedures established in temporary directives until they are canceled or replaced by a permanent directive.

A temporary directive can be designed to last for the duration of a short-term issue, but must be reviewed or converted to a permanent directive after one year.

There are two types of temporary directives: instructional letters and executive memos.

2.1.1 Instructional Letters

Instructional letters are the most commonly used temporary directives. They establish temporary policies or procedures for GSA employees to follow. They should not exceed 10 pages.

2.1.2 Executive Memos

Executive Memos establish temporary policies or procedures for GSA employees to follow when an emergent issue requires immediate action. They are issued by the Administrator's office or HSSOs. For example, Executive Memos can temporarily waive a process due to a national emergency.

Executive memos are issued on an expedited timeline. Contact the Internal Directives Program at directives@gsa.gov to begin the expedited issuance. See section 3.5 for more information about issuing Executive Memos.

2.2 Permanent Directives

Permanent directives provide guidance and long-term policy in a subject matter area.

There are four types of permanent directives: operational orders, manuals, delegations of authority, and change in organization orders.

2.2.1 Operational Orders

Operational orders establish policies and procedures that GSA employees must follow. They should not exceed 60 pages. Operational Orders must be reviewed every three years.

2.2.2 Manuals (Also known as Handbooks or Guidebooks)

Manuals establish policies and procedures that GSA employees must follow. They are divided into chapters that contain information and/or procedures for a set of policies or operations. They are typically used in cases when a directive requires detailed information from multiple sources in GSA and are often longer than operational orders.

The purpose of the chapters in a manual are to allow for more detailed step-by-step procedural instructions or display technical information. Chapters can be revised independently from the rest of the manual.

Responsibility for the drafting and maintenance of individual chapters of a manual can be assigned to separate offices. Manuals must be reviewed every three years.

2.2.3 Delegations of Authority

The GSA Delegations of Authority Manual contains official, approved GSA internal delegations of authority from the Administrator to executives in the Office of the Administrator, to the HSSOs, and to the Regional Commissioners. See the manual for information on Delegations of Authority.

Delegations of Authority are processed through Office of Human Resources Management's (OHRM) Human Capital Strategic Planning Division. They do not have to be updated or revised every three years.

2.2.4 Change in Organization Orders

Change in Organization Orders update the structure and/or functions of a GSA organizational component. See the GSA Organization Manual for information on Changes in Organization.

Change in Organization Orders are processed through OHRM's Human Capital Strategic Planning Division. They do not have to be updated or revised every three years.

3. Issuance Process

The issuance process brings a draft document to a fully approved and published internal directive. Each directive has an Office of Primary Responsibility (OPR) responsible for issuing and maintaining it. The OPR coordinates among subject matter experts, leadership, and stakeholders throughout the directive's lifecycle.

Throughout the issuance process, contact the Internal Directives Program at directives@gsa.gov for support and resources.

There are four stages in the issuance process: Drafting, Review and Comment, Final Clearance, and Publication.

3.1 Drafting Stage

Subject Matter Experts (SME) from the OPR are responsible for researching and writing assigned directives during the Drafting Stage.

3.1.1 The Transmittal Section

Internal directives require a transmittal section. The transmittal section contains important information about a directive that is conveyed in a standard format.

The transmittal section of the directive must include all mandatory sections and follow formatting rules included in the directive template Appendix A.

3.1.2 The Body of the Directive

The body of the internal directive communicates the rules and procedures that the directive establishes. The formatting of the directive body is not as strict as in the transmittal section. The OPR has significant freedom to change the format to effectively communicate policy.

The final product must

- be 508 Compliant,
- follow Plain Language Guidelines, and
- use heading and subheading numbering conventions detailed in the directive template in Appendix A.

3.2 Review and Comment Stage

At this stage, stakeholders are given an opportunity to review and provide feedback on the draft directive. The OPR is responsible for distributing the draft, asking for feedback, and working with stakeholders to address any concerns.

The Review and Comment Stage follows the steps below:

1. The OPR identifies stakeholders to be consulted during the Review and Comment Stage. Possible stakeholders include:

a. SMEs throughout the agency that were not involved in the drafting process;

b. Offices or employees with roles and responsibilities assigned to them directly by the directive;

c. Leadership overseeing the subject area; and

d. The OGC division that provides legal counsel to the OPR.

2. The OPR distributes the draft to the stakeholders and provides an opportunity for them to review, comment, and concur. The OPR should plan for this stage to take two weeks, though the timeline could change based on the policy's complexity and length.

3. If necessary, the OPR revises the draft based on stakeholder feedback.

4. The OPR obtains concurrence from their HSSO on the final draft.

3.3 Final Clearance Stage

At this stage, the directive will be cleared for legal sufficiency and then approved by the directive's final approving authority.

At this point, the directive is no longer a draft. A proposed directive that has been submitted for the Final Clearance Stage should only require further changes for legal sufficiency or if requested by the final approving authority.

The Final Clearance Stage follows the steps below:

1. The OPR submits the proposed directive to directives@gsa.gov. Submissions should include:

    - The proposed directive, as a Google Doc.
    - A decision paper only if the Administrator needs to approve the directive.
    - Confirmation that the proposed directive has passed through the Review and comment stage described in section 3.2.
    - A two to five sentence announcement of policy updates to communicate to affected employees. OAS will use the announcement to publicize the directive once it has been published. Appendix B is an example of a publication announcement.

2. The Internal Directives Program reviews the proposed directive and assigns the directive a number.
3. OAS routes the proposed directive to OGC to review for legal sufficiency. The OPR will be contacted if revisions are necessary.
4. The final approving authority reviews and approves the directive.

3.4 Publication Stage

Once the directive is approved, OAS publishes the document to the GSA Directives Library on InSite and, when appropriate, GSA.gov.

The Publication Stage of the Directive follows the steps below:

1. The Internal Directives Program publishes the directive to the Directives Library and informs the OPR.
2. OAS adds a short announcement (provided by the OPR) to InSite. Appendix B shows an example publication announcement.
3. The OPR is responsible for any further communications to employees or stakeholders.

3.5 Executive Memo Issuance

The purpose of Executive Memos is to allow the agency to respond to emergent issues in 48 hours or less. They follow an expedited issuance process. The drafting, review, and concurrence of Executive Memos is left to the discretion of HSSOs, the Administrator, and OGC. Once approved for publication to the Directives Library, send them to the directives program. Find a template for creating Executive Memos in Appendix C.

4. Internal Directives Maintenance

Directives must contain accurate information and represent current policy and procedures. OPRs are responsible for monitoring their directives to ensure they stay up to date with current laws, technology, and other circumstances.

The OPR can update or cancel a directive at any time. However, all permanent directives must be reviewed every three years.

The Internal Directives Program will contact the OPR to revise, cancel, or renew a directive before the end of its three year review period. OPRs are encouraged to consult Appendix D: Directive Renewal Checklist to ensure the directive is up to date.

4.1 Revision

To change a directive in a way that affects policy, processes, or responsibilities, the OPR must issue a revised version of the directive. The OPR must review all revised directives and the final approving authority must approve it.

The review process for a revised directive is the same as the processes listed in sections 3.2 and 3.3 of this order with two exceptions:

1. During the Comment and Approval Stage, only stakeholders directly affected by changes to the directive need to review the revised directive.
2. During the Final Review Stage, the OPR can provide a version of the directive that highlights or tracks any changes made to the directive. Review of the revised directive will be limited to the highlighted or tracked changes.

4.2 Administrative Edits

If a directive needs minor, non-substantive changes, the OPR can make administrative edits. Administrative edits do not initiate the revision process.

An administrative edit does not affect a directive's intent or effect. Examples of administrative edits include:

- correcting spelling or grammar;
- updating a URL, email address, or approved GSA organizational information; or
- fixing an error.

Administrative edits do not require a new directive number or date.

To initiate an administrative edit, email directives@gsa.gov.

4.3 Renewal

If after three years a directive is reviewed and does not require any updates, it can be renewed for three more years. To renew a directive that does not need revision, the OPR must initiate the renewal process:

1. The OPR provides documentation to the Internal Directives Program from the OPR's Chief of Staff or designated directives POC confirming that the directive does not need any changes.

2. The Internal Directives Program resets the review period for three years.

4.4 Cancellation

OPRs must cancel an internal directive that is expired, no longer required, or inconsistent with DOAs, agency policy, or Federal law.

To cancel a directive, the OPR contacts the Internal Directives Program at directives@gsa.gov and provides:

- The name and number of the directive to be canceled.
- A brief reason for the cancellation.
- The location where the information can be found instead of the directive (if applicable).
- Confirmation from the office of the final approving authority that the directive is ready for cancellation.

Canceled directives are preserved for historical purposes. Access them in the canceled section of the Directives Library on InSite.

Appendices

- Appendix A: Directive Template
- Appendix B: Publication Announcement
- Appendix C: Executive Memo Template
- Appendix D: Directive Renewal Checklist