

DHS/OPM HR System Public Comments
PO Box 14474
Washington, DC 20044-4474

RE: Comments on Proposed NSPS Regulations--RIN 3206-AK76/0790-AH82

To Whom It May Concern:

I write to express my concerns about changes to work rules in the Department of Defense (DoD). The proposed regulations, known as the National Security Personnel System (NSPS), were printed in the Federal Register on February 14, 2005. This message will be sent to both DoD and my representatives in Congress.

I am a federal employee of 6 years. I am angry that these proposals seem to treat the employees who help defend our country as the enemy. Most DoD employees work hard and are committed. I believe that mistreating the employees will hurt the agency's mission. I am very upset by NSPS. This system will change the way workers are paid, evaluated, promoted, fired, scheduled, and treated. These rules would create a system in which federal managers are influenced by favoritism rather than serving the civil concerns of the American people.

Annual Pay Raises

Under the General Schedule and FWS, employee pay was clear. It was funded by Congress and could not be taken away. However, NSPS will take away this certainty. Salaries and bonuses are funded by DoD. In the past – as recently as just last year – DoD did not fund its awards program. Given the agency's miserable record on this issue, how can employees feel confident that our salaries and bonuses will be funded in the future?

“Friend of the Supervisor” Pay System

With the new patronage pay system, which DoD calls “pay for performance,” the amount of a worker's salary will depend almost completely on the personal judgment of his or her manager. This system will force workers to compete with one another for pay raises, which will destroy teamwork, increase conflict among employees, and reward short-term outcomes. There is no guarantee that even the best workers will receive a pay raise or that the pay offered will be fair or competitive. This system will create a situation in which workers are in conflict with one another and afraid to speak out about harassment, violations of the law, and workplace safety problems. Furthermore, there will be no impartial appeal system to assure that everyone is treated fairly.

Schedules and Overtime

NSPS will allow managers to schedule employees to work without sufficient advance notice of schedule changes. This will make it extremely difficult for working parents to care for their children and family. It will also mean that abusive managers could harass employees with bad schedules or short notice. Overtime rotations can be canceled, which means that employees may not be able to plan adequately for childcare and other important responsibilities.

Civilian Deployment

Federal employees could be assigned anywhere in the world, even into a war zone, with little or no notice. Public employees are proud to serve our country, but they are also responsible for caring for their families and personal obligations.

America is at war. We are fighting for democracy abroad. But these regulations are an attack on workers' basic rights. Furthermore, NSPS will divert the attention of defense workers from the soldiers' welfare to protecting themselves from abuse on the job. I urge you to force DoD to rethink this proposal. We need work rules that preserve fairness, serve the American people, and respect the rights of Defense Department workers.

Sincerely,

Jamee Berkley, SSA, Whiteville,NC
