

Bernie Bush, DISA HQs, 703-607-4410

BushM@DISA.MIL

3/15/05

1. Why do they think pay for performance will work now when it didn't under PMRS back in the early 1990s? Under PMRS it seemed that if you worked for a "rich" organization you could expect to receive an appropriate (pay for) performance award if you worked for a "poor" organization your reward for the same level of excellent performance was much less – if any. What safeguards are incorporated under the new NSPS system to ensure that the same thing doesn't happen?
2. "Classification Appeals – (pg 7559) what impact will having everyone on a "standard" generic PD have upon others on the same PD if someone appeals their "standard" PD?
3. Performance & Behavior Accountability (page 7562) only speaks to "employee's behavior. What if it is the supervisor's/manager's behavior which impairs task/job accomplishment? The rules need to address this issue.
4. Will there be a different pay system for Supervisors and NonSupervisors? Like in the FWS system? Why? Why not?
5. For consistency, strongly recommend all of DoD come under the same Pay Banding ranges. Additionally, for consistency and ease of movement, strongly recommend DoD wide standard PDs. Strongly recommend putting these approved/standard PDs into a DoD classification guide by series with classified (by OSD CPMS) benchmarks to be used by DoD agencies.
6. 9901.405 (2) / 9901.406 (a) / 9901.408
Without some kind of input (360 or what have you) the manager has much too much control over what an employee receives. NSPS needs to establish consistent DoD wide requirements as to how an employee's performance will be evaluated – e.g., 60% based upon supervisor's written justification, 20 % based upon employee's justification; 10 % based upon peer/co worker input; 10% based upon customer's input. Failure to do so will result in disparate treatment and a constant loss of employees moving to the agencies where it is easier to receive higher pay for performance increases.
7. NSPS seems to focus upon the employee there is little or no guidance on how the supervisor will be evaluated/compensated. Recommend the same (360) used for employees be used for their supervisors, i.e. subordinates, peers, & customers' input is weighted for an overall rating.
8. 9901.331 Does this mean people in the same locale will get different "locality" pay based upon what career group they are placed into. This doesn't make sense – everyone in the same locale should get the same "locality pay". It would be fairer to first start with everyone getting the same "locality pay increase" and cost of living adjustment. Any other increase (like a WIGI, or QSI) could be adjusted based upon the pay group. For example (to avoid the "rich" vs. poor" agency syndrome mentioned above) DoD could establish the maximum amt to be paid by pay group which would take into the impact of the private sector upon Federal jobs – e.g. lets say for example, that the maximum amount allocated is 3, 4, or 5% of someone's salary, then those in the Clerical group/pool

Bernie Bush, DISA HQs, 703-607-4410

BushM@DISA.MIL

3/15/05

maximum would be 40% of that; then the maximum for those in the Administrative group/pool would be 60 % of the maximum; Technical 80%; Professional 100%, etc. etc.

9. 9901.332. Strongly disagree see above. Everyone working in the same local market regardless of pay pool/career groups should get the same “locality pay”.

10. 9901.333. Strongly disagree that the pay will be based upon the availability of funds. If the government doesn't stay competitive with private industry there will be a mass exodus of federal employees to the private sector. All agencies should have the same amount available based upon some kind of systematic approach, e.g. historic data as to average per capita increase or maybe based upon a percentage of the Agency's average salary. Strongly recommend that this money be both fenced and guaranteed by law.