

## Comment to NSPS Proposed Rule (70 FR 7552)

General: The proposal, as published was far too general with not enough procedural/process detail to accurately provide comments. An economic analysis comparing the cost of the proposed system should have been presented. Due to the magnitude of the changes, why did the Department not utilize a sixty-day comment period? Comparing the design to the personnel changes in the Department of Homeland Security is perplexing considering the lack of a track record in that Department that has considerable management problems. I believe that DoD civilians, although having a unique mission, are not as a group of civil servants, unique. They work with a “military organization” and are as dedicated to their common mission as the military component, but they have been doing this for a long time, so the rationale for the change is suspect.

Subpart D. NSPS purports to emphasize that employee performance goals must be aligned with mission objectives. This can be done without a personnel system change by careful strategic planning and aligning organizational goals with position descriptions and the appraisal system/documentation. Currently, too high a percentage of employees within OSD receive awards or bonuses, so perhaps the baseline should be readdressed. How will the rewards system change this under NSPS? I believe the potential for abuse would be present under NSPS. More functionality of the pay-pool manager should have been addressed. How are dollar values set aside equitably for each organizational element? Can the pay range be adjusted downward based on external economic indices (local market)? This would be a step back from the current system for those already vested and subject to budgetary gaming.

Subpart B. DoD’s experience with paybanding was based to a large extent with organizations with very defined groups of workers that were for the most part engineering and technical in nature. How will the Department organize the bands in a more diverse administrative/program management environment that may include unique professions, such as historians?

Subpart F. I believe the ability to recruit at a higher level within a band is subject to abuse and political favoritism or to an all too familiar “hire the ex-military” rather than recruit young college graduates.