

Comments on the National Security Personnel System (NSPS) Proposal

General:

I believe the proposed NSPS will undermine the Civil Service and hurt the mission of the DoD employees.

The National Security Personnel System (NSPS) Proposal does not represent the views of all concerned parties, as directed by Congress in 5 USC Section 9902(m)(3). I do not see where the employee representatives (i.e., the Unions) had any meaningful input. I also do not see where the checks and balances are to prevent human nature, either from management or from employees, from using the NSPS to the detriment of the federal government and the warfighter. Our current system may not be perfect, but at least it provides redress to management from employees and to employees from management.

The federal government requires stability in its support of the warfighter. It must avoid the appearance of unethical, immoral or other unwise behavior that would erode the confidence of the American people in our ability to provide them protection and other humanitarian support.

I have worked for the federal government for most of my career, both military and civilian. When I was a warfighter, I felt more confident knowing I could concentrate on my mission without having to worry about constant changes in my logistical support. Civilians provided that support. They were more likely to be around for more than a two or three year tour at a military installation. This consistency provides a multiplier in mission effectiveness as military personnel come and go. The new military personnel reporting in can rely on the civilians to provide corporate knowledge of their systems and what is required to support them.

I'm also concerned about the effectiveness of teams under this proposal. It seems to reward individuals for their efforts. Where is the incentive for individuals to work with others?

NSPS is very different from anything ever previously done or proposed in the civil service. The basic premise of NSPS could not even be considered without an act of Congress permitting temporary suspension of existing civil service laws and protections for DoD employees. The main thrust and intent of NSPS is to consolidate control of employment, deployment and compensation at DoD level. DoD would set my pay, not Congress. With the recently announced local budget cuts, it is obvious DoD is not anxious to increase my pay.

Local management would become less relevant in many respects since DoD would dictate what and where my job would be, much like military personnel. My excellent ratings from and relations with my supervisor and local management would make no difference if the Defense Secretary lowered the pay for my series and/or decided to deploy people in my series to another location on very short notice. The stated purpose of

NSPS proposals is to make the civilian workforce "flexible" and "responsive." NSPS as proposed would make it virtually impossible for my local management or union to alter the Secretary's plans for me. Administration promises of "no draft" need not encompass the existing DoD workforce.

I oppose the implementation of the NSPS as it currently is written. It requires input from all affected parties before it is implemented. Otherwise, it will not be effective in supporting the warfighter.

Subpart C Pay, Sections 9901.301 to 9901.373

The employees in DoD should continue to receive the same annual pay across-the-board adjustment that other GS/FWS workers receive.

The individual pay increases for performance should include guaranteed percentages in the regulations so that employees will understand the pay system and what their pay increase will be depending on their performance.

Subpart D Performance Management - 9901.401 to 9901.409

In order to insure fairness and accuracy, DoD employees should be able to appeal any performance rating to an independent grievance and arbitration process like they can do now.

Subpart F Workforce Shaping - 9901.6012 to 9901.611

DoD should not change the current layoff/RIF rules which give balanced credit to performance and the employees valuable years of committed service to DoD.

Subpart G Adverse Actions - 9901.701 to 9901.810

Due process and fairness demand that the independent body reviewing a major suspension as termination be allowed to alter the proposed penalty if they deem it to be unreasonable. The current standards approved by the courts to guide such bodies should continue to be used.

Subpart I Labor-Management Relations - 9901.901 to 9901.929

The labor management law that has governed the employees' right to organize and engage in collective bargaining has worked well since 1978. There is no compelling reason to take away most of the collective bargaining rights or grievance rights.

DoD should not create a "company dominated dispute board." Any dispute board must be "jointly selected" by management and the Union.