



DEFENSE INFORMATION SYSTEMS AGENCY

P. O. BOX 4502  
ARLINGTON, VIRGINIA 22204-4502

16 MAR 2005

IN REPLY  
REFER TO:

Civilian Personnel Division (MPS1)

MEMORANDUM FOR PROGRAM EXECUTIVE OFFICE, NATIONAL SECURITY  
PERSONNEL SYSTEM, ATTN: MR. BRADLEY B. BUNN

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

1. The Defense Information Systems Agency (DISA) has reviewed the proposed rule concerning the National Security Personnel System, 5 CFR Chapter XCIX and Part 9901. The following comments to the proposed rule are as follows:

a. General Comments

1. The proposed rule is general in nature and provides for the Department of Defense (DoD) to develop and issue directives. The proposed rules lack sufficient detail on three of the subparts--those dealing with classification, pay, and performance management.

2. Some of the comments received by employees believe the proposed pay-for-performance system would lower employee morale, increase competition among employees, and undermine teamwork and cooperation.

3. Employees are concerned of DoD's ability to successfully implement the proposed system, or of managers and supervisors to establish and apply performance standards fairly and consistently to pay decisions.

b. Subpart B – Classification

1. The proposed rules are too vague because of the lack of detailed information on such features as how occupational clusters and bands will be established, which occupations will be assigned to each cluster, how GS grades will "cross-walk" to bands, and which positions will be assigned to each band.

2. Provide clarification on how positions will be converted into the system

c. Subpart C – Pay and Pay Administration

1. The proposed rules lack specificity on the pay structure and the pay administration rules governing the proposed DOD pay system

2. The proposed rules are too vague and difficult to understand because of the lack of detailed information concerning the following issues:

- a. How will band rate ranges be established and adjusted?
- b. How will locality and special pay supplements be established and adjusted?
- c. How will performance pay pools be funded and operated?
- d. How will pay and pay adjustments be determined under the new system?

3. Define the pay bands and the criteria DoD will use to assign positions to bands.

4. Provide the standards DoD will use to qualify and promote employees to higher bands (*e.g.*, time-in-service, formal education requirements).

5. Provide the criteria that DoD will use to promote employees to a pay band

6. Provide specifics on how manager and team leader positions will be assigned to clusters and bands.

7. Provide clarification concerning when eligible employees would be entitled to pay increases.

8. Provide clarification of how employees will progress through an Entry/Developmental pay band.

d. Subpart D – Performance Management

1. The proposed rule is vague and lack specificity.

2. Provide clarification regarding the coverage of members of the Senior Executive Service (SES).


3. The proposed rules require the use of at least three summary rating levels Performance Appraisal System. Will DoD implement a Performance Appraisal System that will be used DoD wide?

4. Employees have expressed concerns regarding fairness, subjectivity and consistency of the rater, rater favoritism, and rater bias.

5. Does the proposed system provide for accountability of supervisors at all levels of the organization to ensure that decisions are made based on principle, equality and fair-mindedness?

DISA Memo, MPS1, Comments on Proposed NSPS Regulations - RIN 3206 – AK76/0790-AH82, 16 MAR 2005

2. If you have additional questions, please contact Julie Brown, MPS1, at (703) 607-4740, DSN 327-4740, or by e-mail at brown8j@ncr.disa.mil.



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