

5 CFR 9901 Comments –

Subparts B Classification and C - Pay and Pay Administration – These subparts lack specificity. It appears that grades will be the intent is to eliminate grades and steps in favor of pay bands for all positions including Prevailing Rate positions. However, “Grade” is defined in Subpart I Labor – Management Relations. (Section 9901.903) There is clear discussion of pay pool composition. My agency has sub-organizations that are geographically dispersed and diverse funding. Should pay pools require a minimum number of employees, the composition may have to be based on funding and with respect to “local market supplements” and or locality wage impacts on wage rates for prevailing rate employees, the regulation does not address these circumstances or how performance pay outs will be reflected in this geographic dispersion. Because of the lack of detail and the delay in implementation for prevailing rate (wage grade) employees, a further review and comment period should be provided for these subparts.

Subpart I Labor –Management Relations.

Section 9901.907 National Security Labor Relations Board. Since these positions are not political appointees, political affiliation should play no role in the appointment of Board Members.

Section 9901.908. Powers and Duties of the Board – Board hearings should be open to the public. The Board could order a hearing or any part of a hearing closed, however, when doing so would be in the best interests of the parties, a witness, the public, or any other person affected by the proceeding. Any order closing the hearing will set out the reasons for the Board's decision. Any objections to the order will be made a part of the record.