

I submit the following comments on NSPS:

The Case for Action, pg 7552

Not every function under DoD is involved with military support and/or national security. Why not experiment with those positions that do fall in those areas first since the need is allegedly so great? Why are intelligence jobs not under the National *Security* Personnel System?

Pg 7553

NSPS will increase the administrative burden on managers both initially and long-term as performance expectations must be constantly revised to match constantly changing goals and workloads, not to mention the number-juggling required to manage pay pools and performance payouts. The conversion to another system will consume a large amount of time which could be devoted to achieving mission goals. Managers already turn to their employees when vital tasks need doing.

Pg 7564

If the goal is to "re-shape" the workforce, why not just conduct a department-wide RIF and save the cost of implementing a whole new personnel system? Or must this new system be set up first to void the length of service protection under the current system so that large numbers of employees nearing retirement age can be re-shaped out of their jobs before they are eligible to collect benefits, as is not uncommon in the private sector?

Pg 7567

A 20-day time period is inadequate to gather information, consult with a counselor and file any claims of appeal.

Pg 7573

It won't help to be able to attract good employees if there's no money to pay them. There are numerous vacancies in my agency because there is no money in the budget to hire people to fill those jobs.

9901.103

“Performance means...including an employee’s behavior and professional demeanor (actions, attitude, and manner of performance)...”

Is this limited to behavior on the job or behavior in general? This needs to be better defined in light of recent private sector firing of smokers.

“Unacceptable performance....”

It’s difficult to comment on this without a concrete description of performance expectations, but it appears that there is no room for human error (WMDs excluded apparently).

9901.212

It seems to me that multiple pay schedules (each with 2 or more pay bands) within various career groups at numerous installations nationwide would increase the administrative burden, not ease it.

9901.313

If the NSPS is a better system, why is a formula necessary to fix it to ensure adequate payroll allocation? Will the formula ensure that all FTEs allocated will actually be funded or will the funds be meted out through a long chain of command? How will that work exactly?

9901.322(d)

Any increases in a pay band should be applied equally to all rates to minimize administrative burden.

9901.401(b)

A precise description of the fair, credible, and transparent appraisal system, along with a description of the checks and balances that would make it so, would be useful.

9901.405

How will 9901.405(b)(4) be accomplished? As with the rest of this proposed rule, there’s not enough useful information provided on which to base one’s comments.

9901.406(b) It's a shame that civility and respect for others should have to be codified. I am concerned with the use of the general term behavior and its inclusion as a performance expectation (see comments above relative to fired smokers).

9901.607(a) and 9901.608(b) List the retention factors in the same order in both places instead of trying to confuse the issue.

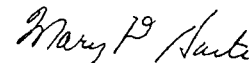
9901.607 (a)

If the "fair and transparent performance rating system" under NSPS is so fair and transparent, it should not be necessary to alter the existing retention structure.

In conclusion:

The civil service is supposed to be immune to favoritism and the vagaries of politics, but the NSPS could introduce such forces into DoD civilian service by its very nature. Conversion to a new system will waste untold hours in "training" and "communication" just to get NSPS off the ground. The administrative and fiscal burdens under NSPS will be far greater than continued use of the General Schedule system, and our country already has an unimaginable deficit.

I appreciate the opportunity to comment.

  
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