

Program Executive Office
National Security Personnel System
Attn: Bradley B. Bunn
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March 16, 2005

Mr. Bradley.

I'm sending this in hard copy because none of the "contact us", email (nspscomments@cpms.osd.mil) are functioning. I can't say I'm surprised. I'd also like to thank you for the 6 whole days of notice before the public comment period ends. (We received an email from the Army NSPS Program Manager on March 10 at 1:24 Pacific Std. Time).

I haven't had time to read all 54 pages of the new NSPS rule in the Federal Register but I've read enough to make some observations and comments.

Page 7553: "...the current personnel system is based on 20th century assumptions about the nature of public service.... cannot adequately address the 21st century national security environment." You make this sound like we haven't changed anything in the current personnel system for the last 50 or 60 years. We are only into the 21st century 5 years, not 50. I saw this statement as nothing more than an attempt to make the new system seem more necessary.

Same page: "...one-size-fits-all system...." "...and ultimately risky..." Based on the contents of the first two pages of this rule it looks to me like you are trying to pull the wool over the public eyes. As a Federal employee I can tell you unequivocally that the current system is pretty flexible. The reference to "risky" is just another attempt at making the public think we are on the verge of an all-out attack from someone and this new personnel system is somehow going to keep that from happening.

On September 3, 2004, employees received a copy of "Potential Options for the National Security Personnel System Human Resource Management System". On page 2 it mentions "Respect the individual:..." in the second bullet. If you were "respecting" the individual, why didn't Federal employees hear about this new system during the development stages? As far as anyone in my office can tell, the only people who were allowed to voice any suggestions or opinions were all in Washington D.C. Where is the "respect" in a few people deciding what will effect thousands of employees without getting any input? We are required to get public comments for nearly everything we do, why not include the employees in this decision?

On page 3 of the September 3 summary:
Key Concerns;

First bullet: “The current grade structure is rigid and inflexible...” and Second bullet: “ The fifteen-grade General Schedule requires detailed position descriptions....” This is baloney! The current job descriptions are VERY often quite generic in order to remain flexible for future needs or demands placed on a particular position/person. How else would an archeologist (from my office) be assigned on a TDY to Iraq to work as a contract inspector for sanitary and water systems?? And there are hundreds of other similar examples where a person from a given grade and discipline in my office are given assignments in different arenas.

The first bullet is not really true at all. Work assignments are given to the qualified people who have the skills and knowledge to successfully complete the task. In my 20-plus years with the Federal government I have never seen an example of the current pay plan preventing a work assignment from being completed or restricting an organizational structure.

Third bullet: “Complex and detailed job descriptions cause an undue paperwork burden....” Undue paperwork? Come on! The government has had computers for decades but we still require paper copies of just about everything ! As I mentioned above, the current job descriptions are more often generic and “cookie cutter” reproductions that will have certain elements included or taken out in order to fit the projected workload of the position. This “undue paperwork” is just another artificial justification for this whole process. The act of trying to change the pay/grade system in itself is generating VOLUMES of paperwork.

If I had the time, and thought it would do any good, I could send several pages of examples that would refute many of the claims that are being made about the need and virtues of the NSPS system. But before I close I would like to make some points that I’m pretty sure have been brought up by other employees and explained away with rhetoric and double talk.

1. The NSPS system claims to make pay increases based on performance. The problem with this basic premise is there are a lot of supervisors out there that don’t really know exactly what any of their employees are doing from one week to the next. And the supervisors will now have most or all of the control on whether a person receives a pay raise or not. This leaves a lot of room for personalities to become the deciding factor of whether or not someone deserves a raise.

Less than one-tenth of one percent of the Federal employees I have known throughout my career have been anything but diligent, dedicated, honest people who had nothing in mind other than doing the best job they could, 100 percent of the time. They stayed with the government because it was what they wanted to do. Which brings up another short fall of the new system. Loyalty, sticking with an agency for years and years, no longer

has anything to do with a pay raise. That alone is another reason to call “FOUL”!

2. Retirement. The new system will make it virtually impossible for a person under the Civil Service Retirement System to make any kind of intelligent decision about their retirement date. It will make planning very difficult and will probably result in some people retiring too early. They will discover that their annuity check isn't enough and will have to find another job (i.e. NOT retire), and possibly seek public assistance in order to make ends meet. So how will that look on the big picture? Former federal employees adding to the already strained Medicare, and other assistance programs in America.
3. Finally, what this new system is really doing is punishing the average employee. I would bet that “average” employees probably make up the majority of the Federal work force. I mean, it doesn't really make much sense to say the ANY workforce is made up entirely of poor or superior employees, does it?

So what this new system really does is “not reward” the poor performers, rewards the “superior” employees, and punishes the “average” employee because they are not “superior”.

It really has nothing to do with “security” or the “war on terror”. Those are just convenient buzz words currently being used to buffalo the American public into thinking that all of these new committees and subcommittees, and task groups, and human resource systems are necessary to “protect” us while justifying the spending of billions of American tax dollars.

Someone WAY above our level here came up with an idea of how they could cut government spending by not giving DoD employees an annual cost of living increase or step increases, and then funneling that money into some other hokey “security” program(s) that puts money into God only knows what other pet program is stewing in D.C.

I'll wait to see if you print this, like the website says you will, after all the comments are received.

I will also apologize if I have offended you personally with my comments. That was not the intent of my letter.

I also will apologize for not signing my letter. Regardless of the policies about reprimanding employees for exercising their rights (as a Federal employee and a citizen of the United States) I don't trust anyone to read this and not try to retaliate in some way against me. I HAVE seen that happen in my career, once to me and a few other times to fellow employees.

So, with that I will bid you good day.

Sincerely,

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