



DEPARTMENTS OF THE ARMY AND THE AIR FORCE  
NATIONAL GUARD BUREAU  
1411 JEFFERSON DAVIS HIGHWAY  
ARLINGTON, VA 22202-3231

March 17, 2005

Manpower and Personnel Directorate

Mr. Bradley B. Bunn  
Program Executive Office  
National Security Personnel System  
1400 Key Boulevard, Suite B-200  
Arlington, Virginia 22209-5144

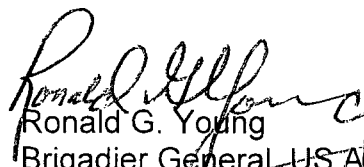
Dear Mr. Bunn:

Thank you for the opportunity to comment on the proposed DoD NSPS Enabling Regulations – RIN 3206-AK76/0790-AH82. Our comments are enclosed.

The National Guard has many unique aspects that require special consideration under the NSPS development phase. I believe this is best accomplished through the participation of a seasoned Title 32 National Guard Technician Program representative at the DoD NSPS level. I have such a representative on my staff, and we will be delighted to participate with the DoD NSPS team.

If you have any questions concerning our comments, please contact Ms. Paula Shipe, Special Assistant to the Director, Technician Personnel at 703-607-5491 or DSN: 327-5491.

Sincerely,

  
Ronald G. Young  
Brigadier General, US Army  
Director, Manpower and Personnel  
National Guard Bureau

Enclosure

P-0056

NATIONAL GUARD BUREAU COMMENTS ON  
PROPOSED DOD NSPS REGULATIONS  
RIN 3206-AK76/0790-AH82

**SUBPART A – GENERAL PROVISIONS**

**Subpart A, Section 9901.102(b):** National Guard concurs with this provision, with one exception. We recommend the language be modified further to permit exclusion of a category of employees from one or more provisions of a NSPS Subpart. We infer from the current language this option is not available.

The ability to apply the NSPS Human Resources Management System in total or by each subpart enables participation of National Guard Technicians under NSPS. Due to the different statutory basis of the National Guard Technician Program (Title 32 versus Title 5), we are unable to implement all aspects of NSPS. At the same time, there are many flexibilities and opportunities under NSPS that National Guard leadership welcomes the opportunity to apply and have the ability to apply within the current statutory framework of Title 32 (e.g., Subpart B, Classification; Subpart C, Pay and Pay Administration; Subpart D, Performance Management). At the same time, we find a single provision in one of the Subparts (Subpart B – Classification, see comments regarding qualification standards under that section) for which National Guard Technicians, due to their unique military nature, should be exempt from coverage. However, the enabling regulation does not permit DoD the option of coverage of a portion of the parts or provisions of a NSPS Subpart to a category of employees.

**Subpart A, Section 9901.103:** The definition of “Unacceptable Performance” states that failure of any performance expectation results in “Unacceptable Performance”.

*“Unacceptable performance means the failure to meet one or more performance expectations.”*

We are concerned this definition encourages the establishment of Performance Expectations that only define and differentiate “Acceptable” and “Unacceptable Performance”. In the parlance of our current system, it seems to only allow for rating of “Critical Performance Elements”. In order to make meaningful performance distinctions between satisfactory and outstanding levels of performance, the National Guard recommends the performance management system also incorporate the use of “non-critical” performance elements. This would allow for the measurement of performance expectations, the failure of which, may not result in an unacceptable rating of record, and the success of

which may help to facilitate meaningful distinctions between successful and outstanding (or higher) levels of performance.

**Subpart A, Section 9901.105(c)(2):** Recommend this paragraph be changed to read:

*“establishing alternative or additional qualification standards for a particular occupational series, career group, occupational pay schedule, and/or pay band for competitive service positions under Section 9901.212(d) or 9901.513 that significantly differ from Governmentwide series and/or standards;”*

Currently, the proposed enabling regulation is constructed in such a manner that a given category of employees is either included entirely or excluded from a Subpart of NSPS. There is no provision for excluding a category of employees from one or two provisions of a subpart. As stated in Subpart B, Classification, we believe the National Guard Technician Program is appropriately covered by the Classification Subpart of the Enabling Regulation, with the exception of development of qualification standards (See Subpart B Comments). In the case of Title 32, excepted service, National Guard Technicians, qualification standards are currently established by the National Guard Bureau (i.e., within DoD) without OPM approval. We recommend NSPS not be used as a vehicle for establishing a new level of review of Excepted Service Qualification Standards. There are reasons to continue the practice of establishing National Guard unique, excepted service, qualification standards under NSPS in order to simplify and close the gap between military membership and Technician employment. While the decision to enable National Guard to continue development of organization unique qualification standards might be more appropriately considered in the development of Implementing Instructions, we recommend above modification of Section 9901.105(c)(2) in order to preserve the opportunity to continue to establish National Guard unique (*excepted service*) qualification standards without the additional requirement of OPM review. The alternative to this recommendation is to accept our recommended change to Section 9901.102(b).

## **SUBPART B – CLASSIFICATION**

**Overall:** The National Guard finds the framework for Classification under NSPS to successfully streamline the Classification process within DoD and the National Guard while incorporating sufficient flexibilities and tools to respond to labor market forces - a critical requirement for our mission and workforce. We agree the proposal for broader pay ranges and career groups will lend flexibility and agility to the management of organizations during mission changes resulting in reshaping and/or resizing of the workforce. Additionally, the incorporation of an OPM level review in the classification reconsideration process will help us to reassure employees of procedural justice and administration of the classification

system will be accomplished in a fair and equitable manner. Our concern at this point is about the next stage: "How to define and measure labor markets in an effective manner without absorbing resources required to accomplish the overall mission of DoD and the National Guard?"

**Subpart B, Section 9901.212(d):** Recommend either (1) exclusion of National Guard Dual Status Military Technicians from this provision, while providing coverage under the remaining portions of Subpart B; or (2) recommend adoption of National Guard recommended changes to Section 9901.105(c)(2) and Section 9901.514.

The National Guard Technician Program uses National Guard developed qualification standards for recruitment and placement of candidates/employees for dual status military technician positions. National Guard Dual Status Military Technicians are required to hold military membership in the National Guard of the jurisdiction in which employed and to hold a military position that is compatible in unit assignment, occupational specialty, grade and appointment (i.e., enlisted, warrant officer, officer) to the Technician position to which employed. Consequently, National Guard qualification standards are tailored to reflect the membership requirements of our recruitment pool - military members of the National Guard. For example, United States Army and Air Force do not require U.S. citizenship for enlistment of military members. Since the National Guard must hire only National Guard (Army and Air Force) military members into its dual status positions and since that results in a greatly reduced labor pool, U.S. citizenship is not required for National Guard Dual Status Technician positions. Rather, military membership becomes the overall requirement.

Additionally, the current and future direction of development of qualifications standards for dual status technicians is to use qualification requirements tied to the Department of Army Military Occupational Specialty (MOS) for the majority of Army National Guard dual status military technician positions and to military Occupational Specializations or Air Force Specialty Codes (AFSC's) for the majority of Air National Guard dual status military technician positions. Coverage of National Guard Technicians under a broad (one size fits all) DoD qualification standard system, will not enable critical linkage with the military characteristics of the Technician Program. These military characteristics support the concept of the Technician Program as specified by Congress: "...to serve *concurrently* in three different ways: (a) Perform full-time civilian work in their units; (b) perform military training and duty in their units; and (c) be available to enter active Federal service at any time their units are called." [Reference Senate Report 1446, dated July 22, 1968, accompanying The National Guard Technician Act of 1968, P.L. 90-486]

## **SUBPART C: PAY AND PAY ADMINISTRATION:**

**Subpart C, Section 9901.304:** See comments concerning definition of “Unacceptable performance” under comments for Section 9901.103.

**Subpart C, Section 9901.334(c):** It is unclear from this provision, whether or not employees who do not have a current rating of record due to leave of absence in the uniformed service, will be granted a presumptive rating of successful for purposes of eligibility for local market supplements. Ninety-six percent of National Guard Technicians are military members of the National Guard of their state/jurisdiction with dual membership in either the Army or Air Force Reserves of the United States. When their military units are mobilized and deployed, so are the technicians. Since September 2001, approximately 10-15% of National Guard Technicians are mobilized and/or deployed at any given time. Some National Guard jurisdictions have experienced mobilization of up to 40% of their National Guard Technician workforce. Typically, these deployments may last up to 24 months. Because these technicians can earn and use military leave during their absence, it is important their pay reflect local market supplement increases upon return from the performance of honorable military service. Recommend increases to basic pay under this section be based on a presumptive rating of Satisfactory.

**Subpart C, Section 9901.342(d):** This section has yet to define the final proposal concerning how performance shares will be expressed under NSPS. At this time, the National Guard expresses a preference for a methodology that will allow it to distinguish pay not only based on level of performance, but also to have pay increases be commensurate with the level and value of contribution to mission. We believe the latter will be best reflected when shares are expressed as a percentage of salary, provided automation is available to help compute share values.

**Subpart C, Section 9901.342(d)(4):** The current language of this paragraph states a performance increase may not occur if it causes an employee's pay to exceed the applicable control point. Recommend the language be changed to reflect a performance increase can exceed the applicable control point if the control point criteria is met and the pay increase does not result in basic pay that exceeds the maximum rate of the employee's band rate range. One recommendation for modification is as follows:

*“However, an increase in basic pay may not cause the employee's rate of basic pay to exceed the maximum rate of the employee's band rate range or applicable control point for that range, if control point criteria has not been met.”*

**Subpart C, Section 9901.342(f):** The current language of this paragraph may be insufficient for addressing adjustments for Title 32 National Guard Technicians returning after performing honorable service in the uniformed services. Again, 96% of the approximately 50,000 National Guard Technicians are military members who will be called to active duty when their military units are mobilized. Because National Guard Dual Status Military Technicians must hold a military position in the unit they support full-time (i.e., in the Technician position), and because military doctrine is to mobilize troops with their military unit, it is possible that almost all of a pay pool in the National Guard could be mobilized at one time, rendering a modal rating for that performance cycle invalid. Since September 2001, we have had States or National Guard jurisdictions where 40 to 80% of the Army or Air National Guard members were mobilized at one time. When this happens, the full time National Guard Dual Status Technicians associated with the deployed units are mobilized with those troops. For purposes of determining performance payouts, we recommend that an alternative solution be provided to address situations where a valid statistical pool may not be available for determination of modal rating due to deployment of a significant number of Military Technicians. Perhaps a second option could be made available to allow use of a modal rating from a previous rating cycle when a current cycle will not provide a valid modal rating due to large deployments of full time staff. Recommend a face-to-face meeting between the National Guard Bureau Title 32 Technician experts and the NSPS working group that will produce the best language to accommodate and not penalize our National Guard Technicians who return to duty after heroically and honorably performing service in the uniformed service.

A second concern is how employees who are mobilized during the first pay out cycle will be treated for purposes of the performance pay out in the event there is an insufficient employee base or valid statistical sample in the current pay pool, due to mobilization. In this case, there would be no valid current or historical modal rating to rely upon.

**Subpart C, Section 9901.342(g):** Similar to our comments in Section 9901.342(f), based on the potential for pay pools to be mobilized in whole or almost whole, the National Guard may require an alternative solution to use of the modal rating for the current performance cycle in order to also address returning to duty after being in a workers compensation status. Perhaps another option could be made available to allow the use of a modal rating from a previous rating cycle during those instances where the majority of a pay pool is absent due to mobilization.

**Subpart C, Section 9901.352(b):** This section only subjects the reduction of an employee's rate of basic pay within a pay band for unacceptable performance and/or conduct to the Adverse Action procedures set forth in subpart G of Part 9901 (NSPS). National Guard Technicians are excluded from subpart G under

Section 9901.704(d)(1), yet they will have Adverse Action procedures. Recommend first sentence of this paragraph be modified as follows:

*“Subject to the adverse action procedures set forth in subpart G of this part and implementing issuances, DOD may reduce an employee's rate of basic pay within a band for unacceptable performance and/or conduct (in the case of a National Guard technician employed under 32 U.S.C. 709, subject to adverse action procedures means National Guard Technician Personnel Regulations governing adverse actions.)...”*

**Subpart C, Section 9901.354(b):** This section only subjects the involuntarily assignment of employees to a lower pay band to the Adverse Action procedures set forth in subpart G of Part 9901 (NSPS). National Guard Technicians are excluded from subpart G under Section 9901.704(d)(1), yet they will have Adverse Action procedures. Recommend first sentence of this paragraph be modified as follows:

*“Subject to adverse action procedures set forth in subpart G of this part, DOD may assign an employee involuntarily to a position in a lower pay band for unacceptable performance and/or conduct, and may simultaneously reduce the employee's basic rate of pay (in the case of a National Guard technician employed under 32 U.S.C. 709, subject to adverse action procedures means National Guard Technician Personnel Regulations governing adverse actions.)...”*

## **SUBPART D – PERFORMANCE MANAGEMENT**

Although NSPS Enabling Regulations do not specify the number of summary rating levels that will be used under NSPS, Federal Register page 7560 of the Summary to the Regulations indicates that at least three rating levels will be identified. We believe a minimum of three summary rating levels is insufficient to establish a high performance culture and provide meaningful performance distinctions and ultimately insufficient to meet the goals implied by the statutory requirement that NSPS incorporate a pay-for-performance evaluation system.

**Subpart D, Section 9901.404 – Definitions:** See comments concerning definition of “Unacceptable performance” under comments for Section 9901.103.

### **Subpart D, Section 9901.406 – Setting and communicating performance expectations:**

Based on definition of “unacceptable performance” under Section 9901.103, it appears the only performance expectations that will be considered in the performance management process are those that, if failed, result in “unacceptable performance” rating. Recommend the inclusion of performance expectations, the failure of which may not indicate unacceptable performance, but the level/quality of performance may help to distinguish high and low performers.

**Subpart D, Sections 9901.408(b)(1), 9901.408(c), and 9901.409(i):** These sections of Subpart D, all reference subparts of NSPS that are not applicable to National Guard Technicians, however, comparable National Guard processes exist that would be applicable to National Guard Technicians under this subpart. Recommend language be modified to recognize alternative Adverse Action, Appeals, and RIF processes for employees covered by subpart D of NSPS, but not covered by Subparts G, H, and F of proposed NSPS Enabling Regulations.

Under Subpart D, Section 9901.408(b)(1), we recommend the following language:

*“Consider the range of options available to address the performance deficiency, which include, but are not limited to remedial training, an improvement period, a reassignment, an oral warning, a letter of counseling, a written reprimand, or adverse action defined in Subpart G of this part, including a reduction in rate of basic pay or pay band (in the case of National Guard technicians employed under 32 U.S.C. 709, adverse action is defined in National Guard Technician Personnel Regulations--which will include reduction in basic pay or reduction in pay band).”*

Under Subpart D, Section 9901.408(c), we recommend the following language:

*“ As specified in subpart H of this part, employees may appeal adverse actions (e.g., suspensions of more than 14 days, reductions in pay and pay band, and removal) based on unacceptable performance (in the case of National Guard technicians employed under 32 U.S.C. 709, employees may appeal adverse actions in accordance with National Guard Technician Personnel Regulations).”*

Under Subpart D, Section 9901.409(i), we recommend the following language:

*“DoD implementing issuances will establish policies and procedures for crediting performance in a reduction in force in accordance with subpart F of this part (in the case of National Guard technicians employed under 32 U.S.C. 709, implementing instructions will be established in accordance with National Guard Technician Personnel Regulations).”*

## **SUBPART E – STAFFING AND EMPLOYMENT**

OVERALL: Recommend Title 32 National Guard (NG) Technicians be excluded from coverage under this subpart. Subpart E appears to offer substantial flexibilities over current Staffing and Employment regulations for the competitive service. However, the NG Technician Program is an excepted service program established under separate statute (Title 32) to recognize military and state program characteristics. Because 96% of the NG Technician population is



required to hold military membership in the National Guard as a condition of employment, veterans preference, a key feature of NSPS, does not apply to the Technician Program (this exemption is set forth in statute). Additionally, competitive examining procedures are also not required for our dual status excepted service National Guard technician appointments.

The current Staffing and Employment Program is developed at the National Guard Bureau level and tailored to the unique military requirements of the National Guard Technician Program. Qualification standards incorporate military qualification requirements and, in some cases, provide full time credit for part time reserve military duty which results in the military qualification of an individual to perform the same duties as required in the full time position. Additionally, noncompetitive processes are available for some higher-level placement and promotion actions that simply implement decisions made on the military side. Some of these variations would not fit into the context of limitations on exceptions to competitive procedures as stated in Section 9901.516.

Employment requirements for military membership and compatible military assignment (e.g., military rank, occupation, unit, and Officer/Enlisted/Warrant Officer appointments) result in a significantly reduced labor market for the National Guard Technician Program. Consequently, requirements that make sense in the competitive service or other DoD labor markets do not make good management sense for the National Guard Technician Program. For instance, competitive service employment requires U.S. citizenship as a condition of employment for its positions. Even under NSPS, only limited opportunities exist for consideration of a non-citizen in the excepted service. Yet, because the National Guard Technician labor market is one of military membership, appointment of non-citizens reflects the military membership practices for the Departments of Army and Air Force. This results in approximately 1% of the National Guard Technician workforce not holding U.S. citizenship.

If it were possible to be covered under one provision of Subpart E, we would recommend coverage of National Guard Technicians under Section 9901.512, Probationary Periods. Like the rest of the civilian workforce, the nature of the National Guard Technician work has become more specialized and highly skilled over the years. Consequently, a longer probationary period is preferred to provide sufficient time to observe employees over the life cycle of projects assigned. The National Guard Technician Program does, however, have the flexibility to achieve this change within its current authorities.

**Subpart E, Section 9901.514 Non-citizen hiring.** If a decision to exclude National Guard Technicians from Subpart E of NSPS cannot be made as part of the Enabling Regulations, then we recommend Section 9901.514 be modified to add a paragraph (c) as follows:

*“(c) In the case of Dual Status National Guard Technicians employed subject to Title 32 USC 709, DoD may appoint non-citizens meeting the military membership requirements of that Program.”*

**Subpart E, Section 9901.516 Internal Placement.** If a decision to exclude National Guard Technicians from Subpart E of NSPS cannot be made as part of the Enabling Regulations, then we recommend that the last sentence of Section 9901.516 be modified to restrict its application to only competitive service positions as follows:

*“Those exceptions to competitive procedures set forth in 5 CFR Part 335 apply to competitive service positions under NSPS.”*

This change would be necessary to continue to incorporate National Guard unique hiring/placement procedures incorporated to reflect the military characteristics of the National Guard employment program. Again, our preferred recommendation is to exclude Dual Status National Guard Technicians from inclusion in Subpart E.

## **SUBPART F – WORKFORCE SHAPING:**

Overall Comment on Subpart F: Recommend Title 32 National Guard (NG) Technicians be excluded from coverage under this subpart. Veterans Preference, a key feature of the NSPS Workforce Reshaping strategy, by statute, does not apply to the National Guard Technician Program. Because of military membership requirements for the National Guard Technician Program and the statutory designation of The Adjutant General (who is a *state* employee) as the employer for National Guard Technicians, it is not functional to combine National Guard Technicians in the same competitive area as other DoD civilians for purposes of workforce reshaping. Additionally, by statute, the final level of appeal for reduction in force or workforce reshaping actions rests with The Adjutant General of the State or jurisdiction in which the Technician is employed. Consequently, appeal to Merit Systems Protection Board is also not possible (that is, it is not legal).

From an administrative or management perspective, the current regulations for conducting workforce reshaping in the National Guard Technician Program have for some years supported the performance management goals now being sought under NSPS. The National Guard process for Reorganizations, Realignments, and Reduction In Force, based on regulations published in 1993, currently retains Technicians on the basis of tenure and performance appraisal score. Service computation date or seniority is only used as a tiebreaker. Recommend exclusion of Title 32 National Guard Technicians under this subpart due to comments expressed in the preceding paragraph.

## **SUBPARTS G, H, and I – ADVERSE ACTIONS/APPEALS/LABOR-MANAGEMENT RELATIONS**

The National Guard Bureau was afforded the opportunity to participate on NSPS Working Groups for NSPS Subparts G, H, and I. Consequently, National Guard unique concerns were addressed early in the process and we have no further comments on these Subparts. We thank the NSPS Project Team for that involvement and request similar participation in the other NSPS functional areas.

### **SUMMARY COMMENTS:**

The National Guard Bureau is grateful for the opportunity to comment on the Proposed NSPS enabling regulations. We are very aware this is the first and perhaps only review and assessment of the NSPS Human Resource System Design as it pertains to the statutorily unique Military Technician Employment Program established for the National Guard. While we understand we are not the only organization that did not see these regulations until the February release, we recognize, however, the other organizations first viewing these regulations have the comfort of knowing that many experts in their employment programs (Title 5) considered and assessed impact of the NSPS changes on Title 5 civilian employees prior to their limited 30 day review. In contrast, a heavier weight lies with the National Guard Bureau in that it is the sole level of expertise reviewing NSPS with a focus towards the unique statutory and program aspects of the Title 32 Technician Program. From that standpoint, 30 days is a short time period to learn the regulation and assess impact of the NSPS changes to a markedly different workforce than that considered by the NSPS Project Team.

Unique aspects of the National Guard Technician Program include the requirement for military membership for 96% of the workforce and all the consequences of that military membership that include: military mobilizations/deployments and their impact on the individual technician and organization; simultaneous management of dual civil service/military careers; requirements for compatibility between technician position and military assignment; dual military/technician qualification requirements. Additionally, the program is Congressionally mandated and designed to incorporate state characteristics whose roots stem from the U.S. Constitution. This combination of

State characteristics coupled with the military purpose of the National Guard Technician Program creates a unique Human Resource Management environment and needs for the Program. For this reason, we recommend Title 32 National Guard expertise be inserted earlier in the NSPS design process, particularly when it comes to the development of NSPS Implementing Instructions.

*Signed*

Ronald G. Young  
BG, USA  
Director, Manpower and Personnel  
National Guard Bureau

17 March 2005

TO WHOM IT MAY CONCERN:

Enclosed are the National Guard Bureau's comments concerning the proposed DoD NSPS Regulations. These comments were submitted through the NSPS Web Site on March 16, 2005 (see attached confirmation). They are being hand delivered today to provide the NSPS Program Executive Office with a point of contact for NGB on these comments.

As a side note, we found the NSPS Web Site submission process user friendly. We did note the absence of military rank options under the heading "Title" and recommend, in the future, that military ranks be added so that our military leadership can appropriately comment on matters affecting the employees they supervise and the organizations they manage.

15 February 2005

Program Executive Officer  
National Security Personnel System  
ATTN: Mr. Brad Bunn  
1400 Key Boulevard, Suite B-200  
Arlington, Virginia 22209-5144

Dear Mr. Bunn;

Please consider all that follows my thoughts, opinions and comments on the new National Security Personnel System, hereafter the NSPS.

While I can honestly say that I am extremely pleased that the need for a new system was both recognized and realized, I continue to have reservations. I completed the majority of my federal career while assigned to a facility notorious for using the personnel system to achieve the personal goals of management there in. I am sure that I speak for not only myself, but countless others who were the unwitting and unwilling recipients of the unfairness these actions bred. It is to that end that I must voice my concern with several parts of the proposed NSPS. Please consider:

1) Under Classification - "More flexibility to assign employees new or different work; Lengthy, detailed job descriptions no longer needed and Movement through pay band based primarily on performance, contribution." It has been difficult enough for some of us to receive fair performance evaluations based on merit as it is. I shudder to think how difficult it will be when the new system is implemented. Flexibility to assign duties will be just another way for a manager who does not personally approve of an employee to conduct business in a less than professional way once again.

2) "Performance pay increases based on performance/contribution... and Greater flexibility in setting employee pay upon promotion, reassignment, etc." Again, I can see this area being abused also based on past experience. This in my opinion is tantamount to giving a manager permission to reward those employees he/she likes and penalizing those he/she does not.

3) "Supervisors work with employees to establish performance goals and expectations, aligned with mission-related goals, Ongoing feedback and communication between supervisor and employees, Ratings reflect meaningful distinctions in employee performance." This particular section is laughable in that it is difficult to accept that anyone actually believes that individual performance will be judged and rated fairly. It is possible that it may happen in administrative organizations where top management has its finger on the pulse of the organization, but I can assure you it has never happened in the trenches and this change is not going cause it to now.

4) Adverse Actions and Appeals - Proposed changes are positive and welcomed.

5) Labor Relations - This area concerns me more than any other as it would seem the new tone is going to be one of an atmosphere that will be ruled with an iron fist. It is no secret to those of us who have been federal employees for a while and are completely honest, that the employee and not management would seem to have all the rights, protections and privileges under the present system. I simply do not agree that to remove them all from one area and bestow them to another would correct that inequality.

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In closing, I must again say that I am pleased with the development of the new system as it is certainly time for a change. I am not at all certain that the new system as proposed will provide what is best for the civilian workforce, however, I will support the system in whatever its final configuration may be. I thank you for the opportunity to verbalize my thoughts and opinions.

Respectfully Submitted,

A Senior Federal Employee