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DoD/OPM

Opposition to Aspects of the NSPS

Sir or Madam:

I am a current DoD employee in the Acquisition Corps and I am opposed to many aspects of the way DoD proposes to implement the NSPS. I am particularly opposed to the removal of seniority in RIF procedures. As proposed, the NSPS reliance on performance ratings to determination retention in RIFs will result in:

unfair removals; favoritism; excess subjectivity; and likely descrimination against older employees.

Background:

I am currently a DoD GS-13 Supervisory Auditor. I am a CPA with an MBA with an emphasis in Information Systems. My last performance rating was Outstanding (the highest rating) and I received a bonus award. I have over 25 years service with the agency for which I proudly work.

Comments:

In financial/acquisition field, it is often difficult to create realistic and objective performance standards. There is a great deal of subjectivity in any rating system used with professional-type employees. Because of this, the over reliance upon performance ratings to determine RIF retention will be rife with favoritism, distortion, errors, and out right cronyism.

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The subjectivity in the rating system reflects such things as poorly written performance standards, differences in the application of the performance rating systems by different managers, personality conflicts, and in some instances reprisal against persons whom may be trying to protect public interest but who may run afoul of a particular manager or straw-man metrics.

I believe that in RIF situations, the balance between performance ratings and seniority should be used. The use of seniority as the largest weighted factor would result in a more objective and fair RIF system.

Seniority is:

- Objective
- Readily determinable
- Not subject to management manipulation
- Historically accepted.

Bear in mind, that I believe performance should be considered in RIF situations, but the wholesale failure to consider seniority will result in poorer public service.

Note also, there are many other features of the NSPS that I do not like. Frankly, the system seems to be anti-employee while not really doing anything to enhance the ability of public servants to do their jobs. Other that some administrative changes that likely would remove some due process, there is no improvement in the actual measurement or performance of federal employees.

Regards,
Anthony McElroy

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