



United States  
General Accounting Office  
Washington, D.C. 20548

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General Government Division

B-271982

August 1, 1996

The Honorable John L. Mica  
Chairman, Subcommittee on  
Civil Service  
Committee on Government Reform  
and Oversight  
House of Representatives

Dear Mr. Chairman:

This letter responds to your request that we supplement the information provided in our March 21, 1996, letter concerning the October 1995 reduction in force (RIF) that took place in the U.S. Geological Survey's (USGS) Geologic Division.<sup>1</sup> Specifically, you asked us to (1) describe the steps that USGS officials took to ensure that veterans' preference was adequately considered in preparing for and accomplishing the RIF, (2) outline any problems that would impair efforts to correlate the USGS position descriptions that were updated in advance of the RIF with the employees who were ultimately affected by the RIF, and (3) obtain estimates from USGS officials on the number and types of position description updates that had been done.

RESULTS IN BRIEF

According to USGS personnel officials, 415 Geologic Division employees serving in the permanent workforce were directly affected by the October 1995 RIF, either through involuntary separations, reductions in grade, or reassignments. Included among these 415 employees were 62 who were entitled to veterans' preference (14.9 percent).

As a group, division employees with veterans' preference consistently fared better in the RIF than did employees without such preference. While 2.6 percent of those with veterans' preference were separated in the RIF, a larger percentage of

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<sup>1</sup>USGS and OPM RIFs (GAO/GGD-96-83R, Mar. 21, 1996).

employees without such preference, 10.7 percent, lost their jobs. Additionally, USGS succeeded in placing a larger percentage of affected employees with veterans' preference into new positions than those without such preference. Among affected employees, 12.1 percent of the employees with veterans' preference—compared with 5.8 percent of employees without such preference—were offered positions at a lower-grade level. Also, 8.1 percent of the employees with veterans' preference were reassigned to other positions at the same grade level held before the RIF, while 5.9 percent of the employees without veterans' preference were similarly reassigned.

Judging from the information obtained from USGS personnel officials, USGS adopted two strategies to ensure that veterans' preference was adequately considered in preparing for and accomplishing the RIF. First, the officials sought to educate employees on the importance of veterans' preference in determining retention standing in a RIF. They did this to encourage employees entitled to such preference to ensure that they had, in fact, received it. Second, the officials updated and verified the accuracy and completeness of the database that would be used to determine relative retention standing in the RIF. They did this through a personnel records review and by soliciting information directly from the Geologic Division's employees. Our review of the retention listings prepared by USGS personnel to determine employees' relative standing for RIF retention purposes showed that, as required by federal law and OPM regulations, employees with veterans' preference were consistently given higher retention standing than competing employees without such preference.

As the Subcommittee requested, we also undertook efforts to correlate the pre-RIF position descriptions updated by USGS personnel with the employees who were ultimately affected by the RIF. However, we determined from discussions with USGS personnel officials that problems relating to the availability of relevant documents and records would significantly impair our ability to accomplish this work. These problems included (1) the absence of a listing of the position descriptions that had been updated or the changes that had been made, (2) the limited use of USGS' automated personnel management information system to document the position descriptions that had been updated, (3) the large number of Official Personnel Folders (OPF) containing position descriptions that would need to be manually reviewed, (4) the purging of position descriptions from the OPFs of former employees who had transferred to other federal agencies as well as certain other former employees who had retired, and (5) the absence of a complete reference archive of obsolete and superseded position descriptions.

As agreed with the Subcommittee, we obtained estimated data from USGS personnel officials on the number and types of position description updates that had been done, as an alternative to the correlation work. A personnel official estimated that among cases where USGS had updated position descriptions, about 5 to 7 percent involved changes to a position's pay schedule, title, occupational series, or pay grade. The official added that USGS could not knowledgeably estimate the number of position descriptions that had been so extensively changed that these changes had likely influenced the outcome of the competitive level determination process. However, she

expressed her view that few, if any, of the positions with updated position descriptions were placed in different competitive levels as the result of the updating work.

### BACKGROUND

Under federal law,<sup>2</sup> executive agencies must take four factors into account when making retention decisions in RIF situations. These factors are (1) tenure of employment, (2) military preference, (3) length of service, and (4) efficiency or performance ratings.

With respect to military preference, the law provides that most federal civilian employees who performed active service in the armed forces of the United States during time of war (and in certain other circumstances) are entitled to retention rights over employees who did not perform such military service. These retention rights enhance the recipients' retention prospects in a RIF situation. In addition, all veterans (except certain retired military service members) are to receive credit for their periods of active, honorable military service in computing their total federal service.

### APPROACH

To obtain information on the steps that USGS personnel officials had taken to ensure that they had obtained and used accurate information on each employee's entitlement to veterans' preference, we interviewed the key personnel officials in USGS headquarters who were involved in planning and undertaking the October 1995 RIF. We also obtained and reviewed documentary materials relating to USGS' handling of veterans' preference matters.

To determine whether, and in what ways, USGS had applied veterans' preference during the retention ranking process, we obtained and reviewed copies of the retention registers<sup>3</sup> that USGS compiled and used for the RIF. We also obtained divisionwide workforce data from USGS personnel officials on the impact of the RIF on division employees with veterans' preference.

Data provided by USGS personnel officials showed that employees serving under permanent as well as nonpermanent (e.g., temporary) appointments were affected by the RIF. However, we were aware at the outset of our work that employees serving under nonpermanent appointments have no expectation of continuous or long-term employment and are almost always terminated in a RIF situation. Accordingly, we

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<sup>2</sup>5 U.S.C. section 3502.

<sup>3</sup>The Office of Personnel Management (OPM) describes a "retention register" as a list of competing employees, prepared by an employing agency for RIF purposes. Each employee is listed within a competitive level in a prescribed order on the basis of his/her tenure of employment, entitlement to veterans' preference, length of federal service, and record of performance. 5 C.F.R. sections 351.404 and 351.501.

excluded nonpermanent employees (and the positions they held) from our analyses in order to avoid unduly skewing the RIF impact data.

We also excluded data on permanent Geologic Division employees whom USGS personnel officials identified as having separated from USGS on or before the effective date of the RIF but not directly through a RIF action (e.g., through retirement, resignation, or interagency transfer). We did so because we could not readily determine whether these former employees would still have left USGS employment as they did absent the RIF.

As previously agreed with the Subcommittee, we did not independently verify the accuracy or completeness of the workforce data and other information that USGS personnel officials provided from OPFs or other systems of records.

To provide the Subcommittee with pertinent information about the procedural requirements that executive agencies must comply with in considering veterans' preference during a RIF, we reviewed the applicable provisions of federal law in title 5 of the U.S. Code and OPM's governmentwide RIF regulations in title 5 of the Code of Federal Regulations.

To determine the type and availability of information needed to identify and correlate pre-RIF changes to the Geologic Division position descriptions with employees who had subsequently been affected by the RIF, we discussed these issues with USGS personnel officials who had been involved in the RIF preparation work. We determined through these discussions that there were numerous impediments to doing the correlation work. As an alternative, and as requested by the Subcommittee, we summarized these impediments and obtained data estimates from the officials on the number and types of position description updates that had been done.

In July 1996, we provided a draft copy of this letter to USGS, through the Department of the Interior, for review and comment. In subsequent conversations, USGS officials said that our letter accurately stated the facts. Interior officials had no comments.

We did our principal work at USGS' (and the Geologic Division's) Eastern Regional Office in Reston, VA, from September 1995 to December 1995, and limited supplemental work from March 1996 to May 1996, in accordance with generally accepted government auditing standards.

#### THE USGS RIF'S EFFECT ON EMPLOYEES ELIGIBLE FOR VETERANS' PREFERENCE

On October 14, 1995, USGS conducted a nationwide RIF in its Geologic Division. According to workforce data obtained from USGS personnel officials, there were 1,850 permanent employees in the division when the RIF began. Of these 1,850 employees, 273 (14.8 percent) were entitled to veterans' preference.

We also obtained data from USGS personnel officials showing that, divisionwide, a total of 415 permanent employees were directly affected by the October 1995 RIF. Of these 415 employees, 176 were involuntarily separated, 124 were reduced in grade, and 115 were reassigned.

Table 1 shows the number and percentage of permanent division employees entitled to veterans' preference who were directly affected by the October RIF. Of the total 415 RIF actions taken divisionwide, 62 affected employees with veterans' preference. The 62 RIF actions included 7 of the division's 176 involuntary separations (4.0 percent), 33 of its 124 reductions in grade (26.6 percent), and 22 of its 115 reassignments (19.1 percent).

Table 1: Permanent Geologic Division Employees With Veterans' Preference Directly Affected by the October 1995 RIF

RIF action taken	Number of affected employees divisionwide	Affected employees with veterans' preference	Percentage of affected employees with veterans' preference
Separation	176	7	4.0%
Reduction in grade	124	33	26.6
Reassignment	115	22	19.1
Total	415	62	14.9%

Source: USGS Personnel Office.

In reviewing these data, we noted that the percentage of employees divisionwide with veterans' preference, 14.8 percent, and the percentage of employees divisionwide with veterans' preference who were directly affected by the RIF, 14.9 percent, were practically identical. These statistical similarities suggested that, as a whole, employees with veterans' preference fared no better in the RIF than did employees without such preference. However, as discussed in the next section, when the specific type and severity of the RIF actions taken were considered, it became evident that veterans' preference was an influencing factor in determining the outcome of the RIF.

Separation and Placement Rates Differed Among Preference and Nonpreference Recipients

Tables 2 and 3 show the relative impact of the RIF on the Geologic Division's employees with entitlement to veterans' preference and without veterans' preference, respectively. These data show that employees with veterans' preference were

separated much less frequently, relative to their representation in the divisionwide workforce, than were employees without such preference. The data also show that employees with veterans' preference fared better in instances where USGS was able to place employees affected by the RIF into other Geologic Division positions.

Table 2: Relative Impact of the RIF on the Geologic Division's Employees Who Received Veterans' Preference

Type of action	Number of employees affected	Percentage of employee group members affected
Separation	7	2.6%
Reduction in grade	33	12.1%
Reassignment	22	8.1%

Source: USGS Personnel Office.

Table 3: Relative Impact of the RIF on the Geologic Division's Employees Without Veterans' Preference

Type of action	Number of employees affected	Percentage of employee group members affected
Separation	169	10.7%
Reduction in grade	91	5.8%
Reassignment	93	5.9%

Source: USGS Personnel Office.

#### Separations From USGS Employment

According to workforce data obtained from USGS personnel officials, 176 of the Geologic Division's 1,850 permanent employees were involuntarily separated in the RIF. Of these 176 separations, 7 involved employees with veterans' preference and 169 involved employees without veterans' preference.

Expressed in terms of relative separation rates, 7 of the division's 273 employees with veterans' preference were separated, representing a separation rate of 2.6 percent. By comparison, 169 of the division's 1,577 employees without veterans' preference were separated, yielding a separation rate of 10.7 percent, some four times higher.

Placements in Positions  
at Lower Grade Levels

The data showed that USGS placed a total of 124 employees affected by the RIF in other division positions at grade levels lower than those held by the employees prior to the RIF. Of these 124 placements, 33 involved employees with veterans' preference and 91 involved employees without veterans' preference.

Expressed in terms of relative placement rates, 33 of the division's 273 employees with veterans' preference were placed in positions at lower grade levels, representing a placement rate of 12.1 percent. By comparison, 91 of the division's 1,577 employees without veterans' preference were similarly placed, yielding a placement rate of 5.8 percent. These data thus documented that the placement rate for employees with veterans' preference to positions at lower grade levels was more than twice that of employees without such preference.

Reassignments at the  
Same Grade Level

Similarly, of the division's 273 employees with veterans' preference, USGS reassigned 22 to positions at the same grade level as their previous positions. This represents a reassignment rate of 8.1 percent. By comparison, 93 of the division's 1,577 employees without veterans' preference, or 5.9 percent, were reassigned. Thus, employees with veterans' preference again benefited as a group from a higher placement rate than those without such preference.

USGS' RIF PREPARATIONS  
AND RELATED ACTIVITIES

According to information obtained from USGS personnel officials, USGS took specific steps in the months leading to the October 1995 RIF to ensure that (1) Geologic Division employees were made aware of the importance of veterans' preference to their retention prospects under a RIF and (2) the database that would be used to determine an employee's relative retention standing in the RIF was complete and accurate.

Employees Were Briefed  
on RIF Procedures

Documentation obtained from USGS personnel officials showed that, in March 1995, a team consisting of the Acting Chief Geologist and two personnel specialists presented briefings to Geologic Division employees in each of the three USGS regions on the

probable need for, and the mechanics of, a RIF in the division.<sup>4</sup> Additionally, copies of viewgraphs prepared by these officials for the briefing showed that included in the information provided was an outline of each specific factor—tenure, veterans' preference, length of service, and performance ratings—that federal agencies must consider in determining relative retention standing for RIF purposes. USGS personnel officials who presented these briefings said that veterans' preference was explicitly covered during the presentations and while answering questions posed by briefing attendees.

#### RIF Information "Reference Rooms" Were Established

USGS personnel officials related that reference materials and other information on the RIF process were made available to employees in specially designated reference rooms established in each of USGS' three regional offices. Documentation provided by a personnel official showed that included among the materials made available to employees was specific information on the eligibility requirements for veterans' preference. Other reference materials made available in these reference rooms discussed the role of veterans' preference in the RIF process.

The officials also said that the names of each member of the RIF preparation teams established in each region were listed in materials in the reference rooms. The officials related that this was done so that employees would know whom to contact if they had questions about their rights in a RIF.

#### Employees Were Directly Involved in Ensuring the Accuracy of Their Personnel Records

USGS personnel officials said they contacted each Geologic Division employee in writing, in advance of preparing the RIF retention registers, to request the recipient's assistance in ensuring that employment-related information on file in the personnel office's database was accurate and complete. This step was deemed important to the integrity of the process because personnel officials planned to use this database as the principal source of information for assembling the registers that would be used in the RIF.

Documents provided by these officials showed that in May 1995, USGS' Acting Personnel Officer sent an individually addressed memorandum to each Geologic Division employee entitled "Review of Personnel Data." In this memorandum, the Acting Personnel Officer abstracted information then on file in USGS' personnel office

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<sup>4</sup>The officials also said that the briefings were videotaped and that the tapes were distributed to USGS field locations for viewing by employees who could not attend the briefings in person.



on the recipient's duty station, work schedule, tenure group,<sup>5</sup> entitlement to veterans' preference, service computation date, and last four performance ratings. In addition, the Acting Personnel Officer set forth the following:

"Your duty station, work schedule, tenure group, veteran preference, service computation date, and annual performance ratings would be major determinants in the RIF process. Thus, in a RIF situation, the accuracy of that data becomes very important and ultimately the Personnel Office is responsible for the accuracy of that information. Efforts are currently underway to check and double check the data."

The memorandum asked each recipient to carefully review the employment data provided in the memorandum and to inform the personnel office of any necessary corrections. USGS' Acting Personnel Officer told us that every response received from an employee requesting a correction was reviewed, and every correction found to be warranted was made to the personnel office's database before the retention register preparation work was finalized.

Personnel Records Were Reviewed  
for Evidence of Veterans'  
Preference Entitlement

USGS personnel officials related that in advance of preparing and sending out the May 1995 memoranda, personnel assistants in each region reviewed the contents of the OPF of every Geologic Division employee in their respective locations. The officials said that this was done to verify the accuracy of the information in the personnel office's database—including employees' entitlement to veterans' preference—against records contained in the OPFs and to make corrections to the database wherever necessary.

A USGS personnel official provided us with a completed and initialed OPF verification checklist that she said had been used in the OPF review process. This checklist indicated that entitlement to veterans' preference for RIF purposes was determined from records in the OPFs during the course of the review process.

USGS personnel officials added that authoritative evidence of entitlement to veterans' preference, such as a copy of form DD 214 ("Certificate of Release or Discharge from Active Duty"), was required for an employee to receive such preference.

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<sup>5</sup>Under 5 C.F.R. section 351.501, each competing employee in a RIF is assigned to one of three tenure groups, governed by his or her type of appointment, and to one of three tenure subgroups, governed by his or her entitlement (or lack of entitlement) to veterans' preference.

RIF Training Was Provided for  
Staff Involved in Competitive  
Level Determinations

As we noted in our previous letter to you, USGS officials told us that USGS scientists and other agency staff members had assisted USGS personnel specialists in reaching (and validating) competitive level<sup>6</sup> determinations in preparation for the RIF. According to documentation obtained from USGS personnel officials, these scientists and staff members were provided, in June 1995, with day-long training on the mechanics of the RIF process that included discussions of various retention, placement, and qualifications issues.

A USGS personnel official explained that an objective of this training was to provide these scientists and staff members with technical information on the relevant requirements governing competitive level determinations and assignment rights in a RIF situation to help prepare them for their RIF-related work. The official added that the role of veterans' preference in the RIF process was one of the subjects covered during this training.

Employees Raised Few Concerns  
About Veterans' Preference

We asked USGS personnel officials about the kinds of questions that division employees had raised with them during the RIF briefings and in later contacts about the RIF process in general and veterans' preference in particular. The officials said their impression was that employees seemed to be less uncertain about entitlement to veterans' preference than about other parts of the RIF process, such as those dealing with employees' rights to displace other employees with less retention standing. The officials attributed this situation to the fact that veterans' preference is a relatively straightforward subject and that employees seemed to readily understand how veterans' preference was determined. They added that all questions raised by employees about veterans' preference were answered.

As an example of the kinds of RIF-related questions that USGS personnel received from USGS' employees, a personnel official provided us with a documentary compilation of E-mail messages and inquiries sent to USGS personnel officials in late April 1995. This material showed that employees had raised a variety of issues relating to benefits entitlements, RIF assignment rights, and post-RIF employment. However, veterans' preference issues were not raised in any of the questions posed at that time.

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<sup>6</sup>OPM defines a "competitive level" at 5 C.F.R. section 351.403(a) as a compilation of all positions in a competitive area that are in the same grade and classification series and that are similar enough in duties, qualification requirements, pay schedules, and working conditions so that an agency may reassign the incumbent of one position to any of the other positions in the level without undue interruption.

Veterans' Preference as  
an Issue in Employees'  
RIF Appeals

USGS personnel officials told us that 123 current and former employees filed RIF appeals with the Merit Systems Protection Board (MSPB).<sup>7</sup> A personnel official who said she had reviewed a number of the appeal filings told us that perhaps three or four of the appellants had raised issues relating to their placement rights as veterans. She added, however, that none of the appeals that she had reviewed raised an issue asserting the improper denial of veterans' preference or the granting of such preference to someone not entitled to receive it.

RETENTION REGISTERS DOCUMENT  
USGS' APPLICATION OF  
VETERANS' PREFERENCE

At our request, USGS personnel officials provided copies of the retention registers that they had compiled and used in accomplishing the October 1995 RIF. We reviewed these registers to determine (1) whether there was evidence that USGS had actually applied veterans' preference in establishing the order of employees' retention and (2) whether employees with veterans' preference were consistently ranked higher—and, thus, given higher retention standing—than employees occupying positions in the same competitive level without such preference.<sup>8</sup>

We found that USGS personnel officials did, in fact, differentiate between employees who were entitled to veterans' preference and those who were not, in constructing the retention registers. This is documented in the registers through the placement of some employees in retention categories (tenure subgroups) specifically reserved for employees entitled to such preference. Other employees were assigned to the remaining retention categories applicable to employees without veterans' preference.

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<sup>7</sup>Data provided by a USGS personnel official indicated that, as of late July 1996, USGS had received initial decisions from MSPB administrative judges (AJ) affirming USGS' actions in seven of the RIF appeal cases. USGS had not, to that point, received any decisions reversing or directing modifications to the agency's RIF actions. Of the remaining 116 appeal cases, the data indicated that 65 were then pending at MSPB; 29 had been dismissed, either because appellants withdrew their appeals or because USGS corrected the RIF actions; 20 had been settled; and 2 were awaiting refiling by the appellants. Additionally, one appellant had petitioned MSPB seeking a review of an AJ decision affirming USGS' RIF action.

<sup>8</sup>Because we did not review employees' OPFs for evidence of entitlement to veterans' preference, we cannot say whether USGS correctly granted veterans' preference in individual cases.

We also found cases where one or more employees with veterans' preference and one or more employees without veterans' preference occupied positions in the same competitive level. In such circumstances, OPM's RIF regulations<sup>9</sup> require that employees with veterans' preference be placed higher on the retention register than competing employees without such preference. In a RIF, employees are released (from their competitive level) beginning with the employee with the lowest retention standing and working upward from that point.<sup>10</sup> This regulatory requirement has the effect of providing employees who have veterans' preference with greater retention standing than employees competing without such preference.

Our review of the retention registers prepared by USGS showed that in each instance where employees sharing a common competitive level were documented in the registers as entitled to veterans' preference, they were consistently listed higher in the order of retention than were employees competing without such preference.

#### USGS' POSITION DESCRIPTION UPDATING WORK

As we reported in our March 21, 1996, letter, a USGS personnel official told us that USGS had updated about half of the Geologic Division's position descriptions as part of its preparations for the October 1995 RIF.<sup>11</sup> The official said that this was done to ensure that (1) the position descriptions accurately documented each position's (then-current) duties and responsibilities, and (2) each position was correctly classified as to title, occupational series, and pay grade. The official added that, with respect to research scientist positions specifically, revisions were also done as needed to update project assignments, provide greater specificity in describing the nature of the work performed, and expand on personal qualifications or contributions in the area of scientific expertise.<sup>12</sup>

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<sup>9</sup>5 C.F.R. section 351.501.

<sup>10</sup>5 C.F.R. section 351.601(a).

<sup>11</sup>Subsequently, the official revised that estimate to between 50 and 75 percent.

<sup>12</sup>As provided in OPM's Research Grade Evaluation Guide (RGEG), the grade levels of research positions are determined, in part, by position incumbents' personal qualifications and scientific contributions. Thus, personnel officials consider both the prescribed research duties of the position and the qualifications of an incumbent scientist in determining a research position's appropriate grade level.

The officials explained that position description accuracy was deemed vital in all cases because of the critically important role that position descriptions played in the competitive levels determination and validation processes.<sup>13</sup>

### Methods Used to Update Position Descriptions

A USGS position classification specialist who was extensively involved in the position description updating process said that necessary updates to the position descriptions were accomplished using three alternative methods.

First, a position description could be updated with a simple pen-and-ink change. The official explained that this procedure was used to accomplish only the most minor changes, such as an organizational title or project name, and that less than 5 percent of the position descriptions were updated by this method.

Second, a position description could be updated by appending a page with additional information to the existing document. The official said that this method was used to make a very specific change, such as to add a prescribed duty, and that about 5 percent of the position descriptions were updated in this way.

Third, a position description could be revised by rewriting the appropriate part(s) and preparing an entirely retyped document. The official said that, in practice, this method was commonly used to accomplish all types of changes, from very minor matters to substantial revisions. She related that more than 90 percent of the position descriptions that had been updated were done by rewriting and retyping the original document.

### Classification Implications of the Position Description Updating Work

The position classification specialist we interviewed also told us that few of the changes made to position descriptions during the updating process resulted in changes to a position's pay schedule, title, series or grade. This official estimated that in less than 1 percent of the cases where pen-and-ink changes were made, and in less than 1 percent of the cases where appended pages were used, did any of these position elements change. She also estimated that where the position descriptions were

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<sup>13</sup>OPM regulations at 5 C.F.R. section 351.403 require agencies to consider grade (or occupational level), classification series, duties, qualification requirements, pay schedules, and working conditions when establishing competitive levels for RIF purposes. Accordingly, an agency would be expected to take appropriate measures to ensure that its position descriptions were, in fact, accurate and complete in advance of making competitive level determinations.

updated by rewriting and retyping, one or more of these position elements changed in just 3 to 5 percent of the cases.

The official said that USGS could not accurately estimate the number of position descriptions that had been so extensively changed during the updating process that the changes had likely influenced the outcome of the competitive-level determination process. However, the official's perception was that few, if any, of the positions whose descriptions had been updated were likely to have been placed in a competitive level other than the one that they would have been assigned to had the position description not been updated.

#### CORRELATING POSITION DESCRIPTION UPDATES WITH EMPLOYEES AFFECTED BY THE RIF

You initially expressed interest in having us determine the degree to which there might be a correlation between position descriptions that had been updated in preparation for the RIF and employees who were subsequently affected by the RIF. Accordingly, we discussed with USGS personnel officials the logistics of obtaining the data needed to do this correlation work. On the basis of those discussions, we concluded that multiple problems concerning the availability of relevant documents and records would significantly impair our ability to accomplish this work. After we advised you of our conclusion, you asked that we outline the problems that we identified.

#### IMPEDIMENTS TO THE CORRELATION WORK

We interviewed the USGS personnel official who served as USGS' Acting Personnel Officer during the planning and operational phases of the RIF as well as other USGS personnel specialists who were involved in preparations for the RIF. On the basis of the information provided by these officials, we identified several significant impediments to doing the correlation work.

#### Listings of Position Description Changes Were Not Compiled

USGS personnel officials said that they did not compile a listing of the position descriptions that were updated in the months preceding the RIF as the work was being done. They also said that they did not compile statistical or descriptive information on the types or extent of the changes made to the position descriptions. As a result, there is no comprehensive, readily available informational resource identifying either the specific position descriptions that were updated or the nature of the changes that were made.

### Formal Personnel Actions Were Not Always Processed

USGS personnel officials related that some, but not all, of the position description changes were documented in USGS' personnel management information system through the formal personnel action process. The officials said that this personnel action process essentially consisted of "reassigning" employees whose position descriptions had been updated from their then-current positions to the same positions with new position numbers. In effect, these personnel actions were no more than paperwork transactions, done for position management and accounting purposes. The officials pointed out that there was no administrative requirement that such personnel actions be processed but added that they felt it was orderly administrative practice to do so.

According to estimates provided by these officials, USGS processed about 400 such personnel actions in total. As noted earlier, about 50 to 75 percent of the position descriptions for the Geologic Division's 1,850 encumbered permanent positions—some 925 to 1,388 position descriptions in all—had been submitted for updating or revision. The officials said that almost all of the position descriptions submitted were changed to some degree during this process.

The officials related that between March 1995 and August 1995, USGS' Eastern Region processed approximately 280 formal personnel actions for this purpose. During the same period, USGS' Central Region processed approximately 40 such actions, and its Western Region processed approximately 80 such actions.

The officials advised us that in instances where formal personnel actions of this type had been processed, USGS could identify the affected positions through inquiries to its automated personnel management information system. However, the officials added that these personnel actions generally would not tell us what specific changes had been made to the position descriptions but only that the position descriptions had been updated in some way and renumbered.

### Individual Position Description Comparisons Would Be Needed to Identify Changes

USGS personnel officials said that the only way to determine what specific changes had been made to the position descriptions was to obtain and compare copies of the "old" and the "new" position descriptions in each case.

The officials explained that position descriptions are filed on the left, "temporary records" side of each employee's OPF. As noted previously, there is no currently existing listing of the position descriptions that had been updated in preparation for the RIF. Accordingly, it would be necessary to review documents in the OPFs of each of the Geologic Division's 1,850 permanent employees to determine (1) whether a particular employee's position description had been updated and (2) if so, what

specific changes had been made. The officials said that this would be a very labor-intensive and time-consuming process.<sup>14</sup>

Some Position Descriptions  
are No Longer Available

USGS personnel officials added that even if the above-referenced work were done, it would still not provide information on every position description that had been updated because the personnel office no longer had some of the position descriptions needed to make all of the comparisons.

An official said that in instances where employees have taken positions with other federal agencies in the months since their position descriptions were updated, the employees' OPFs would no longer be in USGS personnel's custodial possession. The official explained that when an employee transfers to another federal agency, USGS personnel is required by OPM recordkeeping rules to send the employee's OPF to the gaining agency. The official added that OPM also requires that documents filed on the temporary records side of the OPF be purged before the OPF is sent out.<sup>15</sup> As a result, the OPFs of employees who have made interagency transfers since about mid-1995 will no longer be in USGS' possession, nor will they contain USGS position descriptions.

USGS personnel officials advised us in June 1996 that OPM recordkeeping rules also require that the OPFs of former employees who separated from federal service be purged of their temporary records and sent to the National Personnel Records Center (NPRC) in St. Louis, Missouri, for storage. However, they added that the OPFs of most of the employees who separated from USGS (and the federal service) around the time of the RIF had not, to that point, been purged and sent to NPRC.<sup>16</sup> The officials explained that USGS officials had decided to hold these records for an additional period of time in case the records were needed for appeal-related activities or to answer former employees' benefits entitlement questions.

A USGS personnel official also related that the personnel office maintains reference files of position descriptions for all of the agency's current positions. However, the

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<sup>14</sup>We estimate that it would require approximately 925 staff hours—almost 6 months of full-time work—to review and compare position descriptions in the OPFs of 1,850 employees and to catalog the changes identified. In any event, the results of this work would be of very limited value because they would not indicate whether a particular change had any impact on the position's competitive level assignment.

<sup>15</sup>These instructions are contained in The Guide to Personnel Recordkeeping, an operating manual published for personnel offices by OPM.

<sup>16</sup>The officials noted, however, that in USGS' Eastern Region, the OPFs of employees who retired had been purged of their temporary records.



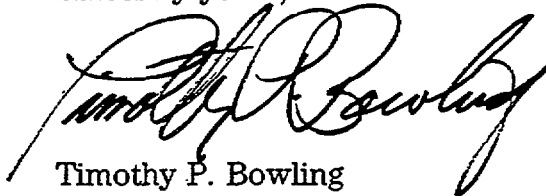
official added that these reference files do not include a complete backfile of obsolete position descriptions or superseded versions of current position descriptions. Accordingly, these reference files would not provide all of the documents needed to make comparisons between updated and earlier versions of position descriptions.

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Copies of this letter are being sent to the Chairman and Ranking Minority Member, House Committee on Government Reform and Oversight; the Chairman and Ranking Minority Member, Senate Governmental Affairs Committee; the Chairman and Ranking Minority Member, House Veterans' Affairs Committee; the Chairman and Ranking Minority Member, Senate Veterans' Affairs Committee; the Secretary of the Interior; the Director, OPM; the Director, OMB; the Director, USGS, and the Chief Geologist, USGS. Copies will also be made available to others who may have an interest in these matters.

Please call me on (202) 512-7680 if you have any questions.

Sincerely yours,



Timothy P. Bowling  
Associate Director, Federal Management  
and Workforce Issues

(410034)



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