

November 2, 2011

Honorable John Berry
Director
Office of Personnel Management
1900 E St. NW
Washington, DC 20415

Re: NOAA Corps officers and PHS Corps officers in USAJOBS

Dear Director Berry:

I have taken office this week as the new Executive Director of the Reserve Officers Association (ROA). We are a professional organization for commissioned and warrant officers of our nation's seven uniformed services: the Marine Corps, Army, Navy, Air Force, and Coast Guard, as well as the commissioned corps of the Public Health Service (PHS) and the commissioned corps of the National Oceanic and Atmospheric Administration (NOAA). (NOAA and PHS do not have enlisted members.)

Our nation has five armed forces and seven uniformed services. *See* 10 U.S.C. 101(a)(4) and 101(a)(5). The uniformed services are the five armed forces (Marine Corps, Army, Navy, Air Force, and Coast Guard) plus the NOAA Corps and the PHS Corps. The current strength of the NOAA Corps is 312 and the strength of the PHS Corps is about 6,500.

One of our NOAA Corps members is Captain Michele G. Bullock, NOAA. She has served full-time in the NOAA Corps for the last 26 years. She has served honorably and effectively in NOAA positions of great responsibility. She recently commanded NOAA's Pacific fleet of research vessels, and she was responsible for relocating NOAA's marine operations center to a new facility.

Captain Bullock is nearing the end of her NOAA career and is looking for a federal civilian job for her follow-on career. She has used USAJOBS to apply for federal positions, and she has a complaint about how your system treats NOAA Corps and PHS Corps officers.

If Captain Bullock were a member of the Navy or Coast Guard, instead of the NOAA Corps, she could check a box in USAJOBS and would be eligible to be considered for merit promotion vacancies open to current federal employees. Under the current configuration of USAJOBS, NOAA Corps officers and PHS Corps officers get no credit whatsoever for their years (sometimes decades) of service to the United States Government.

In an e-mail to us, Captain Bullock complained:

“What the real issue is that my 26 years of [NOAA] service count for nothing in the application process! I might as well have not worked for the government at all. If the internal list is based on merit, the promotion process of the NOAA Corps should be considered merit based as well. It is an up or out system and even more merit based than civilians.

What OPM is telling me is that I am not a federal employee and cannot apply as a federal employee, because they have no other categories. That is not correct. My paycheck comes from the USCG payroll center. Doesn't get more federal than that. I am not necessarily comfortable arguing a NOAA Corps officer's veteran status, but I will argue that we are federal employees and should be treated as such in the application process and we are not.”

I respectfully submit that Captain Bullock makes a good point, not just for herself but for all NOAA Corps and PHS Corps personnel who are nearing the end of their uniformed careers and looking for federal civilian positions. I hope that you might find a way to accommodate federal employees in this category, so that their years of federal service in NOAA or PHS might be reflected when they apply for federal jobs and that they not be thrown into a category which includes United States citizens who have never worked for the Federal Government in any capacity.

I would welcome the opportunity to call upon you or an appropriate member of your staff to discuss this issue and other issues relating to the uniformed services and federal civilian employment. Please feel free to contact me at 202-646-7701 with any questions.

Very respectfully,

Andrew B. Davis
Major General, USMCR (Ret.)
Executive Director