

DEPARTMENT OF DEFENSE

OFFICE OF INSPECTOR GENERAL

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The Office of the Inspector General promotes integrity, accountability, and improvement of Department of Defense personnel, programs and operations to support the Department's mission and to serve the public interest.

Safety and Occupational Health Accountability In DoD Individual Performance Evaluation Reports

September 28, 2007





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MISSION

The Directorate of
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management and program
inspections addressing
areas of interest to
Congress and the
Department of Defense,
and provides timely
findings and
recommendations leading
to positive changes in
programs.

Who Should Read This Report and Why?

This report should be read by military and civilian supervisors throughout the Department of Defense. The report documents observations and recommendations to improve compliance with the DoD requirement to include safety and occupational health accountability on individual evaluation reports.

What Was Identified?

The Under Secretary of Defense for Personnel and Readiness requested this assessment. As prescribed in DoD Instruction 6055.1, "Safety and Occupational Health (SOH) Program," August 19, 1998, "all military (officer and enlisted) and civilian employees shall be appropriately evaluated on their SOH duties and responsibilities, and their personnel evaluation systems shall allow SOH performance to be so evaluated." To examine compliance with this provision, the assessment team reviewed applicable policy and surveyed the Department's military and civilian senior leaders.

DoD policy incorporates the requirements of the Code of Federal Regulations, Title 29, Part 1960.11. Military and civilian personnel management systems also reference the requirements. Performance management system policy is sufficient.

However, implementation is inadequate based on survey data. The overall response rate for the Web-based survey was 43 percent – 1,086 responses. The analysis of the responses resulted in one observation:

• Awareness and Interpretation. Out of 1,086 responses, 34 percent stated they were not familiar with the evaluation requirement. Of the 722 who stated they were aware of the policy, 39 percent answered they did not include safety goals in their job descriptions, and 27 percent said they did not reflect subordinate's safety performance in evaluations. However, 280 respondents (39 percent of those familiar with the policy) stated they had held someone accountable for poor safety and occupational health program performance in the past year.

How It Could Be Improved?

We recommended that the Deputy Under Secretary of Defense for Installations and Environment communicate and clarify the intent of DoD Instruction 6055.1 to senior military and civilians of the Department, and coordinate with the Service offices of primary responsibility, the office of the Deputy Under Secretary of Defense for Civilian Personnel Policy, and the Program Executive Officer, National Security Personnel System to formalize and institutionalize completion of safety and occupational health program management performance in supervisor performance rating systems.

GENERAL INFORMATION

Forward questions or comments concerning the evaluation of Safety and Occupational Health Accountability In DoD Individual Performance Evaluation Reports and other activities conducted by the Inspections & Evaluations Directorate to:

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Defense Hotline The Pentagon Washington, D.C. 20301-1900

REPORT TRANSMITTAL

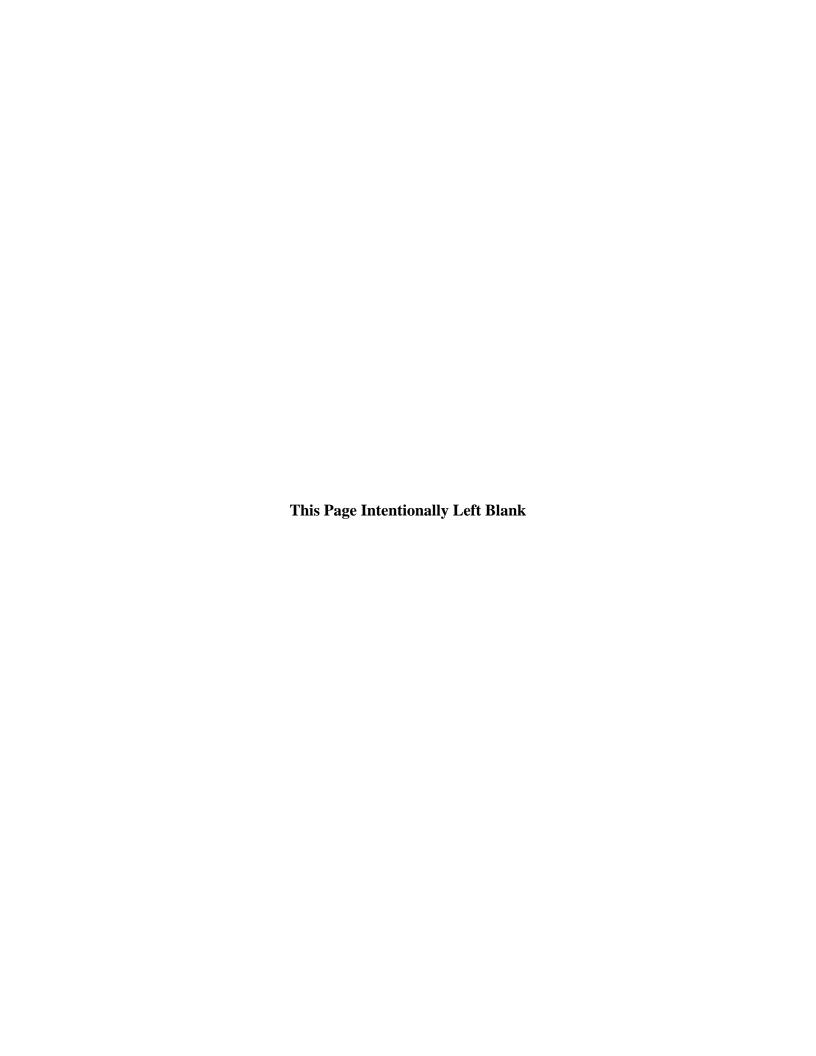
We are providing this report for information and use. We considered management comments to our findings in preparing this final report. Comments received conformed to the requirements of DoD Directive 7650.3, "Follow-up on General Accounting Office (GAO), DoD Inspector General (DoD IG), and Internal Audit Reports," June 3, 2004; therefore, additional comments are not required.

We also forwarded this report, as required by DoD Directive 7650.3, to the Office of the Inspector General Report Followup and GAO Liaison Directorate. We considered management actions acceptable and all recommendations closed. We did not request additional action.

Wm Brem Morrison, III
Assistant Inspector General
for Inspections and Evaluations

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Introduction

Objective. The purpose of this project was to examine compliance with the Department of Defense (DoD) requirement to include safety and occupational health accountability in individual performance evaluation reports. (See Appendix A)

Background. Accidents degrade DoD capabilities and readiness, costing the Department time and money. In 2006, more than 640 Service members and civilians died as a result of accidents. DoD spends more than \$100 million for safety programs each fiscal year, and the average cost of workers compensation claims exceeds \$600 million annually. In addition to these direct costs, estimates for annual indirect costs range between \$10 and \$21 billion.¹

On July 18, 2006, the Under Secretary of Defense for Personnel and Readiness requested the assistance of the DoD Inspector General to assess the Department's compliance with the requirement to include safety and occupational health performance on individual performance reports for all Department employees.

Program Roles and Responsibilities. Authority and responsibility for the DoD safety and occupational health (SOH) program is divided as follows within the Office of the Secretary of Defense:

- Under Secretary of Defense for Acquisition, Technology, and Logistics is "the Principal Staff Assistant and advisor to the Secretary of Defense for all matters relating to ... safety, and occupational health management." The Under Secretary delegated responsibility to the Deputy Under Secretary of Defense for Installations and Environment as the Designated Agency Safety and Health Official. The Under Secretary also delegated program management to the Assistant Deputy Under Secretary of Defense for Environment, Safety, and Occupational Health.
- Under Secretary of Defense for Personnel and Readiness, in his capacity as "the Principal Staff Assistant and advisor to the Secretary of Defense for Total Force management ... [will] establish safety and accident reduction activities to prevent accidents and injuries to military and civilian personnel ... in accordance with the guidelines of the Defense Safety Oversight Council." The Secretary of Defense designated the Under Secretary of Defense for Personnel and Readiness as the chair of the Defense Safety Oversight Council.

¹ Estimate from "Department of Defense: Executive Assessment of Safety and Occupational Health Management Systems," National Safety Council, December 6, 2001.

Authority and responsibility for civilian rating systems in DoD lies with the Deputy Under Secretary of Defense for Civilian Personnel Policy. As of September 2007, the National Security Personnel System (NSPS) was unique among civilian rating systems used in DoD.

- The system was not fully implemented throughout the department.
- The Program Executive Officer reported to the Deputy Secretary of Defense.

Data Collection. To examine compliance, the assessment team reviewed DoD and Service policy, and administered two surveys: telephonic and Web-based. The target population for the surveys was DoD military and civilian leaders – approximately 2800 general/flag officers and members of the Senior Executive Service (SES). In addition to the military officer / civilian division, the population is drawn from six major sub-groups: four military services (Army, Navy, Marines, Air Force), the Joint Staff (JCS), and Others (primarily the Office of the Secretary of Defense and Defense agencies). Beginning on January 17, 2007, the team conducted 159 telephone interviews to validate the survey questions (see Appendix B). Subsequently, the team sent e-mail to the entire target population, requesting they take the Web-based version of the survey. The overall response rate for the Web-based survey was 43 percent, netting 1,086 responses and the basis for subsequent analysis.

Survey and Analysis Results

Policy Review

Compliant performance rating systems satisfy a multitude of laws, regulations, and policy. Specific to safety and occupational health performance evaluation, Title 29, part 1960.11 of the Code of Federal Regulations (29 CFR 1960.11) requires:

Each agency head shall ensure that any performance evaluation of any management official in charge of an establishment, any supervisory employee, or other appropriate management official, measures that employee's performance in meeting requirements of the agency occupational safety and health program, consistent with the employee's assigned responsibilities and authority, and taking into consideration any applicable regulations of the Office of Personnel Management or other appropriate authority. The recognition of superior performance in discharging safety and health responsibilities by an individual or group should be encouraged and noted.

DoD incorporates the requirement of 29 CFR 1960.11 to include safety and occupational health performance on individual performance reports in DoD Instruction 6055.1, "Safety and Occupational Health (SOH) Program," August 19, 1998:

All military (officer and enlisted) and civilian employees shall be appropriately evaluated on their SOH duties and responsibilities, and their personnel evaluation systems shall allow SOH performance to be so evaluated. Evaluations of individuals responsible for the management of SOH programs shall specifically include an evaluation of their SOH program management performance. Performance of SOH duties and responsibilities shall be appropriately considered in other personnel actions.

The Instruction identifies the two distinct employee populations, military and civilian.

Military. The military population referenced is the uniformed members of the Services. The Military Departments (Army, Navy, Air Force) develop, implement, and supervise their own systems for rating their service members. Relevant policy differs among the Departments, but all incorporate the 29 CFR 1960.11 requirement.

Army Regulation 623-3, "Evaluation Reporting System," August 10, 2007, paragraph 3-4c(5)(d)(3) states that "all officers and NCOs will have a safety-related objective/task developed as part of their support form/counseling requirements."

Navy Bureau of Personnel Instruction 1610.10a, "Navy Performance Evaluation System," September 20, 2005, lists Environmental Quality and Safety among Specific Contributions for mention for Officer Fitness Report Input (Exhibit 18-1, page 18-10). However, the list is not prescriptive, in that "the reporting senior is the sole judge of which items to use in the report."

Marine Corps Order P1610.7F, "Performance Evaluation System," May 11, 2006, includes the "extent of fulfillment of the execution and oversight of the command's safety

policy, when applicable, but especially when MRO [Marine Reviewed Officer] is filling an executive officer's or deputy commander's billet with their safety responsibilities" in officer fitness reports. But it is listed in paragraph 4012, the Section titled "Reporting Senior's Directed and Additional Comments," as one of 24 "other" comments available for mention.

Air Force Instruction 36.2406, "Officer and Enlisted Evaluation Systems," April 15, 2005, requires evaluators to "consider items listed below when assessing performance and potential and specifically mention them in evaluation reports when appropriate." How commanders, managers, and supervisors discharge Occupational Safety and Health program responsibilities is among the items listed for consideration in section 1.3.6.

Civilian. As of September 2007, DoD civilian supervisors were rated under a number of systems. Implementing instructions are outlined in DoD Directive 1400.25M, "Department of Defense Civilian Personnel Manual." Two subchapters of the directive addressed reporting of individual performance.

- "Performance Appraisal System," SC 430, "prescribes procedures, delegates authority, and assigns responsibility for performance management within the Department of Defense; and establishes the DoD Performance Appraisal System."
- "Performance Management," SC 1940, "prescribes procedures, delegates authority and assigns responsibility for the NSPS [National Security Personnel System] performance management system."

Subchapter 430 of DoDD 1400.25M contains no explicit mention of safety. Paragraph SC430.2.9 states that performance management programs shall "ensure the incorporation in performance evaluations of matters required by other law, regulation, and DoD policy." This formulation was approved by the Office of Personnel Management on January 31, 1996.

In 2006 the Department began implementing NSPS, with the intent to replace the prior system for applicable DoD civilian employees. Paragraph SC1940.5.7.3 requires a mandatory supervisory job objective for supervisors, holding "supervisors accountable for carrying out the responsibilities outlined in the implementing issuances and subsequent Component policy and guidance." Safety and occupational health again are not mentioned explicitly concerning the development of the mandatory objective. Safety is mentioned directly in the definition of "Resource Management," an optional contributing factor for supervisors and employees job objectives.

All personnel systems in use in DoD passed legal review. In addition, the NSPS Program Executive Officer obtained concurrence from the Defense Safety Oversight Council on October 17, 2006, that the NSPS "includes safety elements for DoD managers."

Observation: Policy Awareness and Interpretation

Performance management system policy is sufficient; compliance is inadequate. Of the 1,086 senior leaders responding to the Web-based survey, Figure 1 shows that more than one third stated they were not aware of DoD's policy to evaluate supervisor performance of safety and occupational health program management (survey

Figure 1. Senior Leader Awareness

supervisor performance of safety and health program management?			
Organization	Count	Yes to Q1	Percent "YES"
Air Force	253	164	65%
Army	415	318	77%
JCS	13	6	46%
Marines	37	29	78%
Navy	178	108	61%
Other	190	97	51%
TOTAL	1086		
TOTAL "YES"		722	66%
TOTAL "NO"		364	34%

question 1). We believe that senior leaders remain unaware of the policy because the requirement is not provided sufficient importance in the Service and civilian personnel rating systems. It is reasonable to conclude that the lack of awareness impacts DoD's goal for full compliance.

More than 95 percent of the 1,086 senior leaders responded that "their subordinates place an emphasis on safety" (survey question 2). This result requires no additional comment.

Further analysis of the 722 senior leaders who stated they were aware of the policy is shown in Figure 2. Awareness did not translate to compliance. When asked if safety

Figure 2. Policy Interpretation

Calculations based responses to survey belo	Question # 1 (see	and objectives include	t 3: Are safety goals ded in the description duties?	Survey Question # 4: Do you reflect your subordinates' safety performance their evaluations?		
Organization	"Yes" to Q1	"No" to Q3	Percent "No"	"No" to Q4	Percent "No"	
Air Force	164	77	47%	44	27%	
Army	318	72	23%	55	17%	
JCS	6	5	83%	3	50%	
Marines	29	16	55%	11	38%	
Navy	108	44	41%	31	29%	
Other	97	64 66%		48	49%	
TOTAL "NO"		278	39%	192	27%	

goals and objectives were included in their job description (survey question 3), 39 percent responded they were not. Also, 27 percent responded that they were not reflecting safety performance in their subordinate's performance evaluations (survey question 4). Responses varied across major Components, with the Office of Secretary of Defense Staff and Defense agencies (Other) displaying the lowest rate.

On a positive note, as shown in Figure 3, almost 40 percent of the senior management respondents stated that they held people accountable for poor performance in safety and health program management over the past year (survey question 5). The assessment team did not sample individual performance rating reports to validate survey responses to question 5 (see Appendix B).

Figure 3. Policy Implementation

Tigure of Toney Imprementation				
Calculations based responses to survey belo	Question # 1 (see	Survey Question # 5: Did you hold anyone accountable for poor performance in safety & health program management in the past year?		
Organization	"Yes" to Q1	"Yes" to Q5	Percent "Yes"	
Air Force	164	67	41%	
Army	318	120	38%	
JCS	6	2	33%	
Marines	29	17	59%	
Navy	108	47	44%	
Other	97	27	28%	
TOTAL "YES"		280	39%	

Management should consider options to improve awareness. Short term ways to increase awareness include communication from the Office of the Secretary of Defense to DoD senior leaders either directly, through normal command channels, or through technical publications. This is likely to be effective immediately, but without lasting impact because of the constant rotation of personnel. Inclusion of the requirement in officer and civilian education classes (pre-command courses, executive development courses, etc.) will likely provide a long-term solution. Another option is explicit inclusion of support for safety and occupational health on supervisor rating forms.

We believe that the lack of specificity in DoD Instruction 6055.1 allows the Services and other agencies to interpret the requirement differently, further contributing to non-compliance. DoD Instruction 6055.1 states that employees shall be "appropriately" evaluated on their safety and occupational health duties, without further defining "appropriately." In addition, which military commanders and civilian supervisors are "responsible for the management of SOH [safety and occupational health] programs," is not adequately defined.

Settling differences in interpretation will require communication and coordination. The Defense Safety Oversight Council is one available forum to discuss differing interpretations and reach consensus. Council membership is sufficiently senior, including Office of the Secretary of Defense, Joint Staff, and Service representation at the level of Under Secretary.

Recommendation. The Deputy Under Secretary of Defense for Installations and Environment should:

- 1. Communicate and clarify the intent of the requirements of DoD Instruction 6055.1 to the Department, specifically targeting senior military and civilian officials.
- 2. Coordinate with the Service offices of primary responsibility, the Deputy Under Secretary of Defense for Civilian Personnel Policy, and the Program Executive Officer, National Security Personnel System to formalize and institutionalize completion of safety and occupational health program management performance in supervisor performance rating systems.

If implemented, the recommendations in this report should increase awareness of reporting requirements, highlight the importance of safety programs to all supervisors, and facilitate compliance with 29 CFR 1960.11 and DoDI 6055.1.

Appendix A – Announcement Memorandum



INSPECTOR GENERAL DEPARTMENT OF DEFENSE 400 ARMY NAVY DRIVE ARLINGTON, VIRGINIA 22202–4704

MEMORANDUM FOR UNDER SECRETARY OF DEFENSE (COMPTROLLER)/
CHIEF FINANCIAL OFFICER
UNDER SECRETARY OF DEFENSE FOR PERSONNEL
AND READINESS

DEPUTY UNDER SECRETARY OF DEFENSE FOR INSTALLATIONS AND ENVIRONMENT DIRECTOR, JOINT STAFF INSPECTOR GENERAL OF THE ARMY NAVAL INSPECTOR GENERAL INSPECTOR GENERAL OF THE AIR FORCE INSPECTOR GENERAL OF THE MARINE CORPS GENERAL ACCOUNTABILITY OFFICE DEFENSE SAFETY OVERSIGHT COUNCIL

SUBJECT: Review of Safety Accountability in DoD Individual Performance Reports (Project Number D2007-DIPOE2-0036.000)

In December 2006, we will begin the subject review at the request of Under Secretary of Defense for Personnel and Readiness. The purpose of the review is to determine compliance with DoD Instruction 6055.1, "Safety and Occupational Health (SOH) Program," August 19, 1998, and the following requirement:

All military (officer and enlisted) and civilian employees shall be appropriately evaluated on their SOH duties and responsibilities, and their personnel evaluation systems shall allow SOH performance to be so evaluated. Evaluations of individuals responsible for the management of SOH programs shall specifically include an evaluation of their SOH program management performance. Performance of SOH duties and responsibilities shall be appropriately considered in other personnel actions.

During the review, we will:

- conduct a survey to determine compliance with the OSD policy for including safety accountability on individual performance plans and ratings,
- · interview OSD and Military Department personnel,
- · visit DoD installations, as required, and
- review exceptional practices related to rating safety performance.

Please provide points of contact for this review to Col Forrest Sprester at (703) 604-9120 or formal-english: 604-9120 or formal-english: 604-9120 or <a href="mailto:formal-engli

Wm. Brent Morrison, III
Assistant Inspector General
for Inspections and Evaluations

Appendix B – Project Process

Scope

Scope. We announced this project in January 2007 to review compliance with DoD Instruction 6055.1, "Safety and Occupational Health (SOH) Program," August 19, 1998, (see appendix A). Specifically, we assessed whether DoD supervisors complied with the DoD requirement to include safety and occupational health accountability in individual performance evaluation reports. The team examined statutory and policy guidance relating to the DoD requirement and conducted two surveys from January 2007 to August 2007. The team did not review evaluation reports.

Methodology

Methodology. The Defense Manpower Data Center provided a database listing all DoD general/flag officers and SES containing 2,810 entries. The team developed and administered the survey questionnaire using telephonic interviews and Web-based access. The team consulted with the Quantitative Methods Directorate of the Office of the Inspector General during all steps in the process.

Survey Questions. The telephonic interviews and Web-based survey contained the same five questions.

- 1. Are you aware of DoD's policy to evaluate supervisor performance of safety & health program management?
- 2. Do your subordinates place an emphasis on safety? If so, what methods do they use: briefings, policy letters, posters, stand-downs, or any other methods?
 - 3. Are safety goals and objectives included in the description of your duties?
 - 4. Do you reflect your subordinates' safety performance in their evaluations?
- 5. Did you hold anyone accountable for poor performance in safety & health program management in the past year?

Telephonic Interview Survey. We began the survey process on January 17, 2007, randomly selecting 267 individuals from the database with the intention of validating survey questions using a statistically valid sample. While we eventually conducted 159 successful interviews, the high error rate of the original database did not allow for projection of the sample to the entire population. However, it did allow us to validate the survey questions. See Appendix C for an example of the script used for interviews.

Web-Based Survey. We initiated the Web-based survey on February 12, 2007, sending e-mail to the entire target population. The e-mail explained how and why the OIG was conducting the survey, how the information would be used, why participation

was important, and directed participants to the survey Web page. We sent two e-mail reminders to encourage survey participation. Data collection stopped on March 5, 2007. See Appendix D for an example of the Web-based survey.

Based on our experience with the listing during the telephonic survey, we scrubbed the roster for obvious errors (see figure 4). Prior to dispatching the Web survey, we reduced the population by 286 to account for 137 respondents without e-mail addresses, 11 with duplicate names, 118 undeliverable e-mails, and 20 e-mails that were sent to

Figure 4. Web-based Survey Population

Original Population from database	2810
No email address	137
Duplicative names	11
Undeliverable emails	118
Other	20
Total identified database errors	286
Potential respondents	2524
Actual respondents	1086
Percentage	43.0%

individuals who had retired or otherwise departed from their position. This resulted in a population of 2,524 potential survey participants.

We received 1,086 valid responses from the 2,524 targeted population, for a response rate of 43 percent. Of the valid responses, we received 722 from general/flag officers for a 64 percent response rate. We received 364 valid responses from SES for a 34 percent response rate.

Team Members

Personnel assigned to the Office of the Inspector General, DoD, Inspections and Evaluations Assessment contributing to this report were:

Mr. William Morrison

Mr. George Marquardt

Mr. Kayode Bamgbade

Colonel Thomas Epperson, USAR

Dr. Sardar Hassan

Major Linda Moschelle, USAF

Ms. Beverly Cornish

Ms. Susann Stephenson

Ms. Carol Brink-Meissner

YN1 Willie Reid, USN

Appendix C – Telephone Interview Script

	tability in DoD Inc		ance Rep	orts Ques	tionnaire	D2007-DIP0E2-0036.000
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	de is (SES or O-´current title?			ii correct	. (
	the following fi			· Ves No	or I Do	on't Know
	based Question	•	YES	NO NO	Don't Know	COMMENTS
evaluate supe	ware of <i>DoD's po</i> ervisor performan am management?					
2. Do your s on safety?	ubordinates place	e an emphasis				Which of methods do they use: briefings \(\), policy letters \(\), posters \(\), safety stand-down day \(\), other \(\) (please explain)
	goals and object					
	flect your subord in their evaluatio					
poor perform	old anyone account ance in safety & agement in the party and the party and the party are account to the party and the party are account to the party and the party are account to the party are acco	health				

For Persistent Comments:

- 1. I'm sorry, I can't provide any additional information, I can only go through the questionnaire.
- 2. You will be receiving a Web-based survey soon and you'll be able to provide additional comments on that survey.
- 3. I can email a copy of the announcement memo to you. Can I verify your email address?

Appendix D – Web-Based Questionnaire



OCCUPATIONAL SAFETY & HEALTH PROGRAM ASSESSMENT OF INDIVIDUAL SAFETY PERFORMANCE

About This Questionnaire

How much time is required to complete survey? This 5-question survey takes less than five minutes to complete.

Why complete this survey? As requested by the Defense Safety Oversight Council (DSOC), the DoD-IG is compiling feedback from active duty flag/general officers and SESs to assess DoD compliance on the requirement to include safety and occupational health performance on individual performance reports for all military and civilian employees. Your responses are important. Our analysis of the survey responses will be presented to the DSOC.

Will my questionnaire responses be kept anonymous? Yes. Do not use any personal names anywhere on this questionnaire.

Privacy Notice

Authority: This questionnaire is being administered by the Inspector General of the Department of Defense under the authority of Section 1566, chapter 80 of title 10, United States Code.

Principal Purpose: To determine compliance with the DoD policy requiring safety accountability on individual performance plans and ratings. Results will improve the effectiveness of the safety and health programs in DoD.

Routine Uses: None.

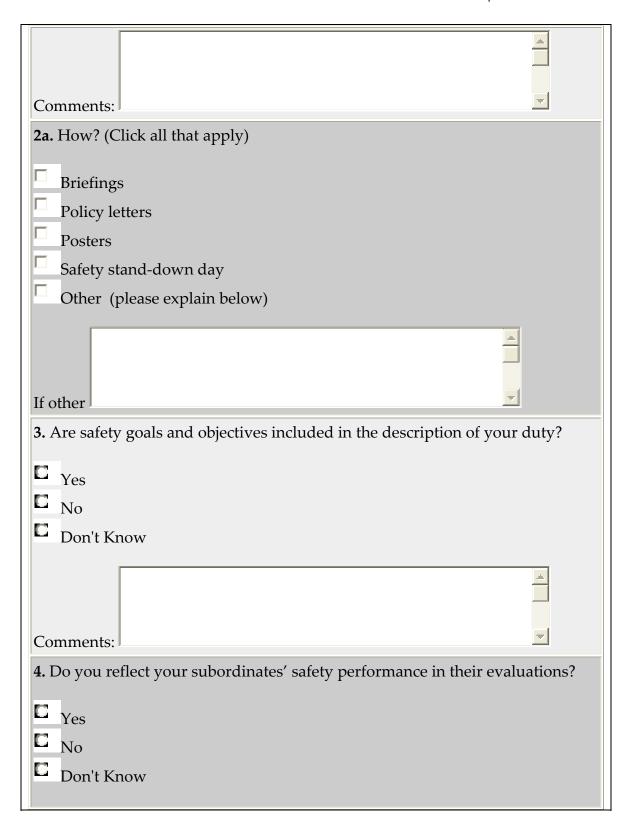
Disclosure: Providing information on this questionnaire is voluntary. There is no penalty if you choose not to respond. However, maximum participation is encouraged. No identifying information is being collected that could identify individuals. Only summary information will be reported.

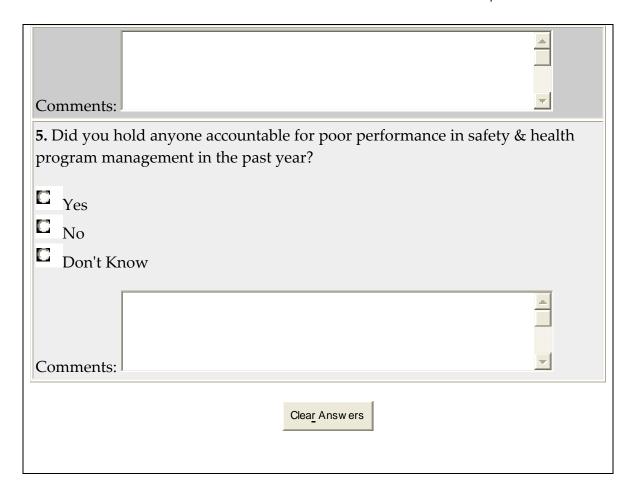
Web-based Survey Questionnaire for Safety Accountability in Individual Performance Reports (SAIPR), Project No D2007-DIPOE2-0036 Completing This Questionnaire:

- 1 This questionnaire will take no more than 5 minutes.
- 2. Select answers you believe are the most appropriate and true to the best of your knowledge.
- 3. Complete all questions before exiting this Web Site.

Introduction: Your responses will be used to determine compliance with DoD policy, regarding safety as an element in performance reports. Please be assured that your response will be kept anonymous. For the purpose of this questionnaire, we do not need your name, but we do need your Rank/Grade level for analyzing the result by groups.

Web-Based Questionnaire
Your Organization:
C Army
C Navy
C Marine
Air Force
C _{JCS}
Other (e.g., OSD, Defense Agency, Field Activity, etc)
Please Specify:
Respondent:
Rank/Grade Level:
Title:
1. Are you aware of DoD's policy to evaluate supervisor performance of safety & health program management?
C Yes
C No
C Don't Know
Comments:
2. Do your subordinates place emphasis on safety?
C Yes
C No
Don't Know





Appendix E – Acronym List

CFR Code of Federal Regulations

DoD Department of Defense

DoD OIG Department of Defense Office of the Inspector General

DSOC Defense Safety Oversight Council

JCS Joint Chiefs of Staff

NSPS National Security Personnel System

OSD Office of the Secretary of Defense

SES Senior Executive Service

SOH Safety and Occupational Health

Appendix F - Report Distribution

Office of the Secretary of Defense

Under Secretary of Defense for Acquisition, Technology, and Logistics*
Under Secretary of Defense (Comptroller)/Chief Financial Officer
Under Secretary of Defense for Personnel and Readiness*
Assistant Secretary of Defense (Legislative Affairs)
Assistant Secretary of Defense (Public Affairs)
Director, National Security Personnel System Program Executive Office*

Department of the Army

Assistant Secretary of the Army for Manpower and Reserve Affairs Inspector General, Department of the Army

Department of the Navy

Assistant Secretary of the Navy for Manpower and Reserve Affairs Naval Inspector General Deputy Naval Inspector General for Marine Corps Matters

Department of the Air Force

Assistant Secretary of the Air Force for Manpower and Reserve Affiars Inspector General, Department of the Air Force

Congressional Committees

Senate Committee on Armed Services Senate Committee on Homeland Security and Governmental Affairs Senate Subcommittee on Defense, Committee on Appropriations House Committee on Armed Services House Committee on Oversight and Government Reform House Subcommittee on Defense, Committee on Appropriations

^{*} Denotes recipient of the draft report.

Appendix G – Management Comments and Evaluation Response

In August 2007, the IG assessment team provided stakeholders with a draft report and requested management comments. Management provided formal and informal comments in September 2007.

Under Secretary of Defense for Personnel and Readiness. The USD (P&R) provided a formal response concurring with report recommendations.

Under Secretary of Defense for Acquisition, Technology, and Logistics. The Deputy Under Secretary of Defense for Installations and Environment provided informal comments including technical corrections and editorial changes to stated facts. The IG assessment team verified and accepted valid changes that improved concepts. USD(AT&L) was preparing formal comments, but they were not complete at the report publication date. Once received, formal comments will be included in project documentation.

Program Executive Officer, National Security Personnel System. In August, 2007 the IG assessment team met with the Program Executive Officer to discuss draft findings. As a result of information provided, the IG assessment team replaced a draft finding and recommendation addressing NSPS with an expanded discussion of department policy outlining compliance with 29 CFR 1960.11. Subsequently, the Program Executive Officer provided informal comments stating that the report should not distinguish NSPS from other civilian personnel rating systems. The IG assessment team disagreed, but modified the report to more clearly explain the uniqueness of NSPS.

Copies of management comments were not included in the final report, but are available on request.



