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COMDTINST 12910.1A
JAN 6 2004

COMMANDANT INSTRUCTION 12910.1A

Subj: SCREENING OF CIVILIAN EMPLOYEES IN THE RESERVE COMPONENTS

- Ref:
- (a) Title 10, United States Code, Chapters 1003 and 1005
 - (b) Title 32, Code of Federal Regulations, Part 44
 - (c) Department of Defense Directive 1200.7, November 18, 1999
 - (d) Department of Defense Directive 8910.1 – M, June 30, 1998
 - (e) Executive Order 11190, “Providing for the Screening of the Ready Reserve of the Armed Forces,” December 29, 1964, as modified by Executive Order 13286, “Amendment of Executive Orders, and Other Actions, in Connection With the Transfer of Certain Functions to the Secretary of Homeland Security,” February 28, 2003
 - (f) Executive Order 12656, “Assignment of Emergency Preparedness Responsibilities,” November 18, 1988 as modified by Executive Order 13286
 - (g) Executive Order 12919, “National Defense Industrial Resources Preparedness,” June 3, 1994 as modified by Executive Order 13286

1. PURPOSE. This Instruction updates U.S. Coast Guard (USCG) policy and procedures for the annual screening of Coast Guard civilian employees who are members of the Ready Reserve components of the Armed Forces and for reporting the results of this screening process.
2. ACTION. Area and district commanders, commanders of maintenance and logistics commands, commanding officers of integrated support commands, commanding officers of headquarters units, assistant commandants for directorates, Chief Counsel and special staff elements at Headquarters shall ensure compliance with the provisions of this Instruction.
3. DIRECTIVES AFFECTED. Screening of Civilian Employees in the Reserve Components, COMDTINST 12910.1, is canceled.

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4. DEFINITIONS. Most commonly referred to definitions. See Enclosure (1).

5. BACKGROUND.

- a. References (a-e) require Federal agencies to conduct an annual survey of employees in the Ready Reserve, and to identify key positions and key employees under criteria established for the screening. After a mobilization is ordered, no deferment, delay, or exemption from mobilization will be granted to Ready Reservists because of their civilian employment. Accordingly, agencies must develop appropriate plans to provide for the continuation of essential operations in the event of mobilization of the Ready Reserve.
- b. The Coast Guard is required to report to the appropriate military service the name of any Ready Reservist who occupies a key position and is identified as a key employee. To avoid conflicting mobilization assignments, the military service concerned will determine whether the employee will be removed from the Ready Reserve or transferred from the Ready Reserve to the Standby Reserve. The decision of the military service is ordinarily final.

6. POLICY.

- a. Every civilian position shall be evaluated annually for designation as a key position. Every civilian employee who occupies a key position, shall verify on an annual basis, whether he or she is a member of the Ready Reserve; and
- b. Members of the Ready Reserve shall not occupy key civilian positions on a permanent basis. Civilian employees who occupy key positions may be members of the Standby Reserve (active status or inactive status) or Retired Reserve; and
- c. Mobilization plans must cover continuation of essential operations in the event civilian employees, who are members of the Ready reserve, are recalled to active duty for up to 2 years.

7. SCREENING PROCEDURES.

a. Screening for Key Positions.

- (1) Upon a schedule to be determined by Commandant (G-WPC), area and district commanders, commanders of maintenance and logistics commands, commanding officers of integrated support commands, commanding officers of headquarters units, assistant commandants for directorates, Chief Counsel and special staff elements at Headquarters shall annually survey all civilian positions to identify, using nomination procedures addressed in paragraph 7.b., those positions that are or should be designated as a “key position”.
- (2) In determining whether or not a position should be designated as a “key position,” the following questions should be considered:
 - (a) Can the position be filled in a reasonable time after mobilization?

- (b) Does the position require technical or managerial skills that are possessed uniquely by the incumbent?
 - (c) Is the position directly associated with defense mobilization?
 - (d) Does the position include a mobilization or relocation assignment in an Agency having emergency functions, as designated under reference (f)?
 - (e) Is the position directly associated with industrial or manpower mobilization, as designated under reference (g)?
 - (f) Are there other factors related to national defense, health, or safety that would make the incumbent unavailable for mobilization?
- (3) It is important to note that “key positions” need not necessarily be high-graded. As the work force becomes increasingly technologically sophisticated, it will be more difficult to effectively refill, during a mobilization, those positions, which require incumbents with highly technical skills. Technicians and specialists may therefore, occupy many key positions.
- b. Key Position Nomination Process. Requests to identify positions as key are to be initiated by the area or district commander, commander of maintenance and logistics command, commanding officer of a headquarters unit; or by a Headquarters Flag/SES-level official if the request covers a Headquarters position, then forwarded directly to the appropriate Headquarters program manager (i.e., Assistant Commandant or equivalent level for programs under their control), who will make the final determination of (i.e., approve) key positions. Positions directly supervised by the Headquarters program manager, and positions for which agreement cannot be reached will be referred to Commandant (G-CCS) for resolution. All final determinations will be submitted to G-WPC for processing and entry into the Civilian Personnel Management Information System (CIVPMIS), and for notifying Commandant (G-CPA-2).
 - c. Identifying Ready Reservists in Key Positions. Each year the Coast Guard is provided a list from the Defense Manpower Data Center of those Coast Guard civilian employees who are members of the Ready Reserve and therefore have a military mobilization obligation. Commandant (G-WPC) will distribute such listings to Command Staff Advisors for use in conjunction with appropriate information from the CIVPMIS as the basis for surveying and identifying Ready Reservists who occupy key positions. G-WPC shall review such lists; in consonance with specific instructions received at the time of the survey, to identify all affected employees, including those addressed in paragraph 7.d. To ensure a comprehensive identification process, G-WPC will query each new employee at the time of accession to determine the individual’s reserve status, and will advise the employee regarding the screening process and any potential personal impact. In addition, G-WPC will also query all employees on an annual basis regarding their reserve status.
 - d. Other Screening Requirements. The annual screening required in paragraph 7.c. shall include procedures to identify individuals in any of the following categories:

- (1) Mobilization Assignees. Civilian employees who are Ready Reservists may not hold a mobilization assignment to the same position they hold as civilian employees. These individuals shall be reassigned or transferred from the mobilization assignment, as appropriate.
- (2) Theological Students. Ready Reservists who are preparing for the ministry in an accredited theological or divinity school (other than those participating in a military Chaplain Candidate or Theological Student Program) cannot be involuntarily called to active duty per reference (b). Accordingly, such Ready Reservists shall be transferred to the Standby Reserve (active status) for the duration of their studies. Ready Reservists participating in a military Chaplain Candidate or Theological Student Program may continue their Ready Reserve affiliation and engage in active or inactive duty training.
- (3) Health Care Professionals. Ready Reservists may not be transferred from the Ready Reserve solely because they are students, interns, residents, or fellows in the health care professions. Upon mobilization, they shall either be deferred or mobilized in a student, intern, resident, or fellow status until qualified in the appropriate military specialty.

8. DOCUMENTATION.

a. Key Positions.

- (1) Position Descriptions. When a position has been approved as “key,” the position description will be modified to include the statement: “This position is designated as a key position. In the event of a crisis situation, war, or mobilization, the incumbent must continue to perform the duties to support mission requirements. A member of the Ready Reserve may not fill the position on a permanent basis. If filled by a member of the Ready Reserve, appropriate action must be undertaken to change the incumbent’s reserve status to a status other than that of Ready Reserve.”
- (2) CIVPMIS. All key positions will be documented as such in CIVPMIS by entering the value “Y” in the data element RSRV KEY within the position (POS) file.
- (3) Personnel Allowance Amendment (PAA) and Personnel Allowance Listing (PAL). All key positions will be documented as such by PAA’s and the PAL by Commandant (G-CPA-2).
- (4) Vacancy Announcements. If a key position is recruited under the Coast Guard Merit Promotion Program and National Merit Promotion Plan, the vacancy announcement will contain the following statement: “This position has been designated as a key position. If selected for this position, the incumbent will be screened for Ready Reserve status and appropriate action will be taken to remove the incumbent from the Ready Reserves, if a member.”

- b. Employee Reserve Status. Any employee identified as a reservist will be documented in CIVPMIS. There are three data elements of concern:

- (1) **RESERVE CATEGORY** – This data element represents the type of reserve category that applies to the employee. The values are:
- E – Reservists who are exempt from call-up.
 - I – Into key position.
 - O – Out of key position.
 - R – Ready Reserve.
 - S – Standby Reserve.
 - X – Retired Reserve.
 - Y – Retired Regular.
 - Z – Disabled veterans or veterans age 60 and above.
- (2) **RESERVE COMPONENT** – This data element represents the employee’s reserve military component. The values are:
- A – U.S. Army Reserve
 - F – U.S. Air Force Reserve
 - G – Army National Guard
 - K – Air National Guard
 - M – U.S. Marine Corps Reserve
 - N – U.S. Navy Reserve
 - P – U.S. Coast Guard Reserve
- (3) **RESERVE DATE** – This data element represents the date the employee moved into or out of a key position, in year-month-day (YYMMDD) order.

9. **RESOLUTION OF ASSIGNMENT CONFLICTS.** Whenever a civilian is assigned to a key position, G-WPC must ascertain the incumbent’s reserve status, and if necessary, initiate one of the actions described below, to resolve any conflict between reserve status and assignment to the position in question.
- a. **Transfer a Key Employee from the Ready Reserves.** Upon determination that a key employee is a Reservist, G-WPC should promptly report that determination to the cognizant military reserve personnel center (see enclosure (2)), requesting that the employee be removed from the Ready Reserve. The letter format shown in enclosure (3) should be used for making such requests. The responsible military reserve personnel center will determine whether the employee will be

transferred to the Standby or Retired Reserve, discharged or retained in the Ready Reserve, and will notify G-WPC of its decision. As members of the Standby Reserve, individuals may not be paid for their voluntary participation in weekend drills or annual training periods. They can, however, earn reserve retirement credit for participation in such training activities.

- b. Notify Military Reserve Center When Key Position is Occupied by a Member of the Standby Reserve or Retired Military. When members of the Standby Reserve and certain retired military members are designated key employees, a reserve notification letter (enclosure (3)) should be submitted to the appropriate military reserve personnel center (enclosure (2)). Such individuals, when identified as key employees, will not ordinarily be issued a military mobilization assignment, thus precluding the possibility of being called to active military service during a national emergency.
- c. Removal from Key Position. Normally, upon notification, military reserve personnel centers will remove key employees from their military mobilization obligation. However, there may be instances when the key employee is retained in a mobilization obligation status. When this occurs, the official designated in paragraph 7(3) b, who made the final determination must again review the position, and make a new determination of the essentiality of its designation as a “key position.” With respect to positions occupied by Coast Guard reservists, Coast Guard Personnel Command (CGPC-rpm) will have authority for making a final determination regarding retention of Coast Guard reservists in key positions. With respect to positions occupied by reservists from other military services, however, if the review confirms that the position should be designated as key, G-WPC will forward to the applicable military reserve personnel center, the justification for removing the employee from the military mobilization obligation. In the event the military reserve personnel center still determines that the key employee will be retained in the Ready Reserve, Commandant (G-CCS) will decide whether to further appeal the decision to the Deputy Secretary of Defense. In accordance with reference (c), the Deputy Secretary of Defense has the authority to adjudicate, before mobilization, conflicts between the mobilization needs of the civilian and military sectors that the reserve screening process has identified but has not resolved. In the event Commandant (G-CCS) decides not to appeal the decision, or if the Deputy Secretary confirms the decision of the responsible military reserve personnel center, G-WPC, in consultation with the cognizant Command, will take action to remove the employee from the key position.

10. REPORTING REQUIREMENTS. G-WPC will complete an annual Federal Employment Screening Questionnaire for submission to the Assistant Secretary of Defense for Reserve Affairs in accordance with reference (d).

11. RESPONSIBILITIES.

- a. Commandant (G-WPC) is responsible for:
 - (1) Developing and implementing policy on the screening of civilian employees.
 - (2) Submitting screening reports to the Assistant Secretary of Defense for Reserve Affairs.
 - (3) Conducting surveys annually to identify Ready Reservists who occupy key positions.

- (4) Properly documenting position descriptions and vacancy announcements in accordance with this instruction.
 - (5) Determining, upon accession, the reserve status of each new civilian employee.
 - (6) Advising and notifying affected Coast Guard civilian employees of annual Ready Reserve screening requirements.
 - (7) Taking appropriate action, in accordance with this instruction, when a key employee is found to be a member of the Ready Reserve.
 - (8) Receiving final determinations regarding nominations for “key positions” for input into CIVPMIS.
 - (9) Maintaining accurate and current data on key positions and reservists in CIVPMIS.
 - (10) Preparing and forwarding to the applicable military reserve personnel center, supportable justification for removing the employee from the military mobilization obligation.
- b. Area and district commanders, commanders of maintenance and logistics commands, commanding officers of headquarters units, assistant commandants for directorates, Chief Counsel, and chiefs of special staff offices in Headquarters are responsible for:
- (1) Reviewing, on at least an annual basis, positions under their purview to identify those, which may be “key positions.”
 - (2) Ensuring the continuation of the performance of the duties associated with identified key positions.
- c. Headquarters Program Managers (i.e., Assistant Commandant or equivalent for programs under their control) are responsible for:
- (1) Making final determinations regarding nominations for “key positions”.
 - (2) Referring to Commandant (G-CCS) for final resolution, any key position nominations for which agreement cannot otherwise be reached.
- d. Commandant (CGPC-rpm) is responsible for
- (1) Notifying G-WPC of action taken to either remove or retain a Coast Guard civilian employee in the Coast Guard Ready Reserve.
- e. Commandant (G-CCS) is responsible for:
- (1) Making final determinations regarding nominations for “key positions” in the absence of agreement at lower levels.

- (2) Making final determinations regarding nominations for “key positions” that are directly supervised by the officials in paragraph 11.c.
 - (3) Appealing to the Deputy Secretary of Defense, a decision to retain a Department of Defense reservist in a position designated by the Coast Guard as a “key position.”
- f. Commandant (G-CPA) is responsible for documenting key position designations on PAA’s and on the PAL.
- g. Coast Guard civilian employees who are reservists are responsible for:
- (1) Notifying their servicing Command Staff Advisor of their reserve status.
 - (2) Notifying their servicing Command Staff Advisor when called into active duty service.
 - (3) Notifying the affected military reserve personnel center of any change of address, marital status, number of dependents, or civilian employment and any other change that would prevent the member from meeting mobilization standards prescribed by the military service in accordance with reference (a).

12. ENVIRONMENTAL ASPECT AND IMPACT CONSIDERATION. Environmental considerations were examined in the development of this directive and have been determined to be not applicable.

13. FORMS AVAILABILITY. None.

Thomas F. Fisher /s/
Acting Director of Personnel Management

- Encl:
- (1) Definitions
 - (2) List of Military Reserve Personnel Centers
 - (3) Sample Letter To Reserve Personnel Center Requesting Employee Removal from the Ready Reserve

DEFINITIONS

1. **Key Employee.** Any Federal employee occupying a key position.
2. **Key Position.** A Federal position that shall not be vacated during a national emergency or mobilization without SERIOUSLY impairing the capability of the parent Federal Agency or office to function effectively.
3. **Mobilization.** Involuntary call-up of reserve component members in accordance with reference (a). This includes full mobilization, partial mobilization, and selective mobilization (Presidential Reserve Call-Up Authority).
4. **Ready Reserve.** Reservists who are liable for immediate involuntary recall to active duty either by the President (with or without a declaration of a state of national emergency) or by the President and Congress (if Congress declares a state of war or national emergency).
5. **Standby Reserve.** Reservists, other than those in the Ready or Retired Reserves, who will be mobilized if it determined that there is a lack of qualified reservists to meet requirements. The Standby Reserve consists of personnel who are maintaining their military affiliation without being in the Ready Reserve.
6. **Retired Reserve.** Retired members of the Armed Forces Reserve Components who are liable for recall to active duty.
7. **Retired Regular.** Retired members of the Armed Forces Regular Components who are liable for recall to active duty.

**LIST OF RESERVE PERSONNEL CENTERS TO WHICH RESERVE SCREENING
DETERMINATIONS AND REMOVAL REQUESTS SHALL BE FORWARDED**

Army Reserve

Army Reserve Personnel Command
1 Reserve Way
ATTN: ARPC-PSP-T
St. Louis, MO 63132

Naval Reserve

Commander,
Naval Military Personnel Command (Pers 91)
5720 Integrity Drive
Millington, TN 38055-9100

Marine Corps Reserve

Commanding General
Marine Corps Reserve Support Command
ATTN: IRR Division
1503 Andrews Road
Kansas City, MO 64147-1207

Air Force Reserve

Commander
Air Reserve Personnel Center/DPAF
6760 E. Irvington Pl. #2600
Denver, CO 80280-2600

Coast Guard Reserve

Commander (CGPC-rpm)
U.S. Coast Guard Personnel Command
4200 Wilson Blvd. Suite 1100
Arlington, VA 22203-1804

Army and Air National Guard

Submit requests to the Adjutant General of the appropriate State,
Commonwealth, or Territory (including the District of Columbia)

**LETTER FORMAT TO COGNIZANT MILITARY PERSONNEL CENTER
REQUESTING THAT EMPLOYEE BE REMOVED FROM THE READY RESERVE**

From: Commandant (G-WPC)

To: (Appropriate Reserve Personnel Center)

SUBJECT: Request for Employee to Be Removed from the Ready Reserve

This is to certify that the employee identified below is vital to the nation's defense efforts in (his or her) civilian job and cannot be mobilized with the Military Services in an emergency for the following reasons:

Therefore, I request that the employee be removed from the Ready Reserve and that you advise me accordingly when this action has been completed.

The employee is:

1. Name of Employee (last, first, M.I.):
2. Military grade and Reserve component
3. Social security number:
4. Current home address (street, city, State, and ZIP code):
5. Military unit to which assigned (location and unit number):
6. Title of employee's civilian position:
7. Grade of salary level of civilian position:
8. Date (YYMMDD) hired or assigned to position:

Signature and Title of Coast Guard Official